

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

10/27/21

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

Vs.

Zachary Taylor Blood

CRIMINAL COMPLAINT

Case Number: 2:21-mj-1312

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about October 26, 2021 in Brooks County, in the Southern District of Texas, defendant, **Zachary Taylor Blood**

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law


in violation of Title 8 United States Code, Section(s) 1324.
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:
Official Title

See Attached Affidavit of U.S. Border Patrol Agent **Hector Villarreal**

Continued on the attached sheet and made a part of this complaint:

Yes No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:


Signature of Complainant
Hector Villarreal
Printed Name of Complainant

October 27, 2021
Date

at Corpus Christi, Texas
City and State

Mitchel Neurock U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

FACTS/DETAILS:

On October 26, 2021, at approximately 12:05 p.m., a grey Dodge Caravan approached the primary inspection lane of the United States Border Patrol Immigration Checkpoint near Encino, Texas. The primary agent greeted the driver, later identified as Zachary Taylor Blood, and questioned Blood as to what he was hauling in the cargo area. Blood replied to the agent, "Dead guy, Navy guy." The primary agent, who is a prior military veteran, proceeded to look towards the cargo area and immediately noticed a rusty and dented coffin. The primary agent observed an American flag that was crudely taped on the coffin with clear packaging tape and zip tied on one corner. The primary agent then asked the canine handler on duty if he could perform a free air sniff on the caravan. The canine handler, also a veteran, asked for consent to open the door of the vehicle while simultaneously his assigned canine alerted to the rear hatch of the vehicle. The canine handler then immediately observed the same discrepancies as the primary agent, due to his prior experience he knew this was not standard protocol for funeral processions of a military veteran. At this time the canine handler asked the primary agent to refer the vehicle to secondary inspection for a more thorough inspection of the vehicle.

In the secondary inspection area, Border Patrol Agents escorted Blood out of the vehicle, and he sat down in the designated area. The canine handler and his service canine conducted a more intrusive search and discovered two subjects inside of the coffin. Both subjects were questioned regarding their immigration status and admitted to being illegally present in the United States. Blood was then arrested and escorted inside the checkpoint for further investigation. The two illegal aliens were escorted into the checkpoint for processing.

All individuals were read their Miranda Rights in their preferred language and signed stating they understood their rights. Blood was not willing to provide a statement to agents without an attorney present. RAMIREZ-Aguilar and HERNANDEZ-Bueno were willing to provide a statement to agents without an attorney present.

MAT-WIT STATEMENT (HERNANDEZ-Bueno, Daniel):

HERNANDEZ-Bueno, Daniel stated he is from Guerrero, Mexico and illegally entered the United States on October 25, 2021. HERNANDEZ-Bueno stated he was going to pay \$6K USD total of which he'd paid \$2K USD to cross the river. HERNANDEZ-Bueno stated his intended destination was San Antonio, TX where he would have to work off the remaining debt. HERNANDEZ-Bueno stated, after illegally entering the United States, he and his cousin (Erick RAMIREZ-Aguilar) walked for approximately half an hour with a brush guide before being picked up by an unknown male subject. HERNANDEZ-Bueno stated he and his cousin boarded the two-door black car and the brush guide stayed behind. HERNANDEZ-Bueno stated they

traveled for approximately 20 minutes before arriving at a wood framed home (no further info) at an unknown location. HERNANDEZ-Bueno stated they stayed for one day.

HERNANDEZ-Bueno stated the next day (October 26, 2021) they were taken to a location which he describes as a parking lot/ area at an unknown location. HERNANDEZ-Bueno stated when they arrived at the parking area, they met up with vehicle occupied by a long-haired light complected male driver, he claimed, "se miro malo" (Spanish for "he looked mean) (RAMIREZ-Aguilar) were given instructions to get out and into the other car one by one. HERNANDEZ-Bueno stated his cousin got into the other vehicle (later determined to be a pseudo hearse) and claimed the long-haired male driver put him into a coffin situated within the vehicle. HERNANDEZ-Bueno stated once his cousin was inside the coffin, he did the same and the driver also put him inside the coffin then closed it. HERNANDEZ-Bueno stated he and his cousin were crammed inside of the coffin which they could only open slightly. HERNANDEZ-Bueno stated it was hot inside of it and he had difficulty breathing.

HERNANDEZ-Bueno stated he was able to get a good look of the driver of the pseudo hearse as they got into the vehicle then coffin. HERNANDEZ-Bueno was shown a photo array of six male subjects of which he immediately recognized subject number #3 of 6, Zachary Taylor Blood. HERNANDEZ-Bueno wrote in his own words, "Esta persona fue el que nos puso en una caja" (this is the person that put us inside of a box-referring to the coffin) along with, "el era el chofer que nos trajo" (he was the driver that brought us- referring to him and his cousin, Erick RAMIREZ-Aguilar).

MAT-WIT STATEMENT (RAMIREZ-Aguilar, Erick):

Erick RAMIREZ-Aguilar stated he crossed illegally into the United States and after crossing he was taken to two different stash houses. At the second stash house which he never entered he waited inside the vehicle that picked him up from first stash house until another vehicle arrived to transport him to a different location.

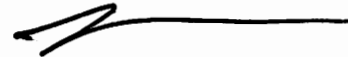
RAMIREZ-Aguilar then was taken to a parking lot where he was ordered to exit the vehicle, he was in. At that time a driver of a hearse exited the driver seat and open the side door of the hearse. RAMIREZ-Aguilar was instructed to enter the hearse and lay down in the coffin. After laying inside of the coffin RAMIREZ-Aguilar didn't feel any movement of the vehicle until approximately an hour later. The coffin's door was not shut completely after he laid inside. Inside the coffin was some sort of white plastic blanket that he used to cover himself as instructed to.

RAMIREZ-Aguilar was directed by the driver of the hearse with a hand signal to cover himself and close coffin completely prior to getting to the checkpoint for inspection. After leaving the parking lot the driver of the hearse never made any stops until arriving to the checkpoint where Border Patrol Agents found him.

RAMIREZ-Aguilar was shown a photo array and was able to positively identify Blood as the driver of hearse and the person who instructed them to get inside of the coffin.

DISPOSITION:

The facts of this case were presented to the Assistant United States Attorney Office who accepted Zachary Taylor Blood for prosecution of 8 USC 1324, Alien Smuggling. Martinez RAMIREZ-Aguilar, Erick and HERNANDEZ-Bueno, Daniel will be held as material witnesses.



Hector Villarreal
Border Patrol Agent

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on this day October 27, 2021.



Mitchel Neurock
United States Magistrate Judge