

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Sworn in on January 8, 2002

UNITED STATES OF AMERICA	:	CRIMINAL NO. :
	:	
v.	:	VIOLATION:
	:	
BERTA ROSA PARADA CAMPOS,	:	8 U.S.C. §§1324(a)(1)(A)(i), (a)(1)(A)(v)(1),
also known as Berta Campos,	:	and (a)(1)(B)(i)
also known as Maria Ester Benitez,	:	(Conspiracy to Commit Alien Smuggling)
ANA KARINA CRUZ RIVAS,	:	
JUAN ORLANDO SERVELLON	:	
DE LEON	:	
ANDREA GIRON,	:	

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

General Allegations

At all times relevant to this Indictment:

1. The defendants, **BERTA ROSA PARADA CAMPOS**, also known as **Berta Campos**, and also known as **Maria Ester Benitez**, **ANA KARINA CRUZ RIVAS**, **JUAN ORLANDO SERVELLON DE LEON** and **ANDREA GIRON**, were citizens and residents of San Salvador, El Salvador, with no known residences in the United States.

2. The defendants, **BERTA ROSA PARADA CAMPOS**, also known as **Berta Campos**, and also known as **Maria Ester Benitez**, **ANA KARINA CRUZ RIVAS**, **JUAN ORLANDO SERVELLON DE LEON** and **ANDREA GIRON**, were engaged in the business of smuggling aliens, including particularly citizens of El Salvador and its neighboring countries, into the United States for commercial advantage and private

financial gain.

3. As of April 4, 2002, G.L.A.M. was an 18 year-old alien migrant female intending to travel from San Salvador, El Salvador into the United States.

The Conspiracy

4. From on or about April 4, 2002 to on or about April 5, 2002, within the extraterritorial jurisdiction of the United States, and, pursuant to Title 18, United States Code, Section 3238, within the venue of the United States District Court for the District of Columbia, **BERTA ROSA PARADA CAMPOS, also known as Berta Campos, and also known as Maria Ester Benitez, ANA KARINA CRUZ RIVAS, JUAN ORLANDO SERVELLON DE LEON and ANDREA GIRON** knowingly and unlawfully did combine, conspire, confederate, and agree with other persons, both known and unknown to the Grand Jury, to attempt to bring to the United States aliens, including "G.L.A.M.," an alien, at a place other than a designated port of entry or place other than that designated by the Commissioner of the United States Immigration and Naturalization Service, regardless of whether such aliens had received prior official authorization to come to, enter, and reside in the United States, and regardless of any future official action which may be taken with respect to such aliens, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i), (a)(1)(A)(v)(I), and (a)(1)(B)(i).

Object of the Conspiracy

5. The object of the conspiracy was to make money by smuggling aliens, including G.L.A.M., into the United States.

Overt Acts

6. On or about April 4, 2002, in San Salvador, El Salvador, **BERTA ROSA**

PARADA CAMPOS, also known as **Berta Campos**, and also known as **María Ester Benitez**, met with G.L.A.M. and confirmed that she had already received \$2,560.00 from G.L.A.M.'s mother, which represented the first half of the \$5,000 smuggling fee, plus \$60 to be given to G.L.A.M. for traveling expenses during the trip to the United States.

7. On or about April 5, 2002, in San Salvador, El Salvador, **ANDREA GIRON** went to the home of **BERTA ROSA PARADA CAMPOS**, also known as **Berta Campos**, and also known as **María Ester Benitez**, and **BERTA ROSA PARADA CAMPOS**, also known as **Berta Campos**, and also known as **María Ester Benitez**, gave **ANDREA GIRON** the names of aliens **ANDREA GIRON** was to meet at the Hotel Pasadena in San Salvador, El Salvador, to smuggle into the United States, via Guatemala.

8. On or about April 5, 2002, in San Salvador, El Salvador, **ANA KARINA CRUZ RIVAS**, **JUAN ORLANDO SERVELLON DE LEÓN** and **ANDREA GIRON** went to the Hotel Pasadena to gather the aliens that **BERTA ROSA PARADA CAMPOS**, also known as **Berta Campos**, and also known as **María Ester Benitez**, had assigned to them to smuggle from El Salvador into Guatemala, which was the first leg of the journey to the United States.

10. On or about April 5, 2002 in San Salvador, El Salvador, **ANA KARINA CRUZ RIVAS** and **JUAN ORLANDO SERVELLÓN DE LEON** took a group of aliens, including "G.L.A.M.," from the Hotel Pasadena to the El Salvador/Guatemala border by bus, and then smuggled the aliens into Guatemala, en route to the United States, without proper documentation.

11. On or about April 5, 2002, in San Salvador, El Salvador, **ANDREA GIRON** took a group of aliens from the Hotel Pasadena to the El Salvador/Guatemala border by bus, and then smuggled the aliens into Guatemala, en route to the United States, without proper documentation.

(Conspiracy to Commit Alien Smuggling, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i), (a)(1)(A)(v)(I), and (a)(1)(B)(i))

A TRUE BILL.

FOREPERSON

Attorney of the United States in
and for the District of Columbia