

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Sworn in on {    }

UNITED STATES OF AMERICA	:	CRIMINAL NO. : 02-205
	:	
v.	:	VIOLATIONS:
	:	
GUILLERMO PANIAGUA,	:	8 U.S.C. §§1324(a)(1)(A)(i), (a)(1)(A)(v)(1),
	:	and (a)(1)(B)(i)
Defendant.	:	(Conspiracy to Commit Alien Smuggling)
	:	
	:	8 U.S.C. §1324(a)(1)(A)(v)(II)
	:	(Aiding and Abetting)
	:	
	:	
	:	

INDICTMENT

The Grand Jury charges that:

COUNT ONE

General Allegations

At all times relevant to this Indictment:

1. The defendant, **GUILLERMO PANIAGUA**, was a citizen and resident of San Salvador, El Salvador, with no known residence in the United States.
2. The defendant, **GUILLERMO PANIAGUA**, was 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. An associate of the defendant, **GUILLERMO PANIAGUA**, referred to herein as "B.C.", operated in El Salvador as the leader of the alien smuggling organization for which the defendant worked.
4. As of April 4, 2002, J.A.R. was a 15 year old male who intended to travel

illegally from San Salvador, El Salvador into the United States.

**The Conspiracy**

5. 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, **GUILLERMO ANTONIO PANIAGUA** knowingly and unlawfully did combine, conspire, confederate, and agree with other persons, both known and unknown to the Grand Jury, knowingly to attempt to bring to the United States "J.A.R.," 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 alien 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 alien, 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**

6. The object of the conspiracy was to make money by smuggling aliens, including J.A.R., into the United States.

**Overt Acts**

7. On or about April 4, 2002, **GUILLERMO ANTONIO PANIAGUA** met with J.A.R. at the Hotel Pasadena in San Salvador, El Salvador in order to make arrangements to smuggle J.A.R. into the United States.

8. **GUILLERMO ANTONIO PANIAGUA** accepted payment of \$2,500.00 from J.A.R., which was one-half of the fee for smuggling J.A.R. to the United States.

9. **GUILLERMO ANTONIO PANIAGUA** instructed J.A.R. not to bring any documentation with him on the trip, and told him that when he, J.A.R., was in Guatemala, he was to pretend to be Guatemalan, and when he was in Mexico, he was to pretend to be Mexican.

10. On April 5, 2002, **GUILLERMO ANTONIO PANIAGUA** drove B.C. and other alien smugglers to the Hotel Pasadena to pick up aliens who would be smuggled that day.

11. On April 5, 2002, **GUILLERMO ANTONIO PANIAGUA** took J.A.R. and other aliens on a bus trip from San Salvador, El Salvador to Guatemala, which was the first leg of J.A.R.'s illegal journey to the United States.

**(Conspiracy to Commit Alien Smuggling**, in violation of Title 8, United States Code, Section 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