

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 26-MJ-6042-JMS

UNITED STATES OF AMERICA

v.

SHERLINDA JOSEPH,  
A.K.A. CHALINDA JOSEPH,

Defendant.

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

JASON A. REDING QUIÑONES  
UNITED STATES ATTORNEY

By: /s/Felipe Plechac-Diaz  
Felipe Plechac-Diaz  
Assistant United States Attorney  
Florida Bar No. 0105483  
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Ft. Lauderdale, FL 33394  
Tel. (954) 660-5779  
Email: felipe.plechac-diaz@usdoj.gov

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

SHERLINDA JOSEPH,  
A.K.A. CHALINDA JOSEPH,

Case No. 26-MJ-6042-JMS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 26, 2026, in the county of Broward in the Southern District of Florida, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 U.S.C. § 1325(a)	Improper entry by alien

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Complainant's signature

James M. Head, Coast Guard Investigative Service

Printed name and title

Sworn to before me and signed in my presence.

Date: January 27, 2025

Judge's signature

City and state: Fort Lauderdale, Florida

JARED M. STRAUSS, U.S. MAGISTRATE JUDGE

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, James M. Head (the "Affiant"), being duly sworn, depose and state:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am employed as a Special Agent with the United States Coast Guard Investigative Service ("CGIS") and have been so employed since 2001. I am a graduate of the Special Agent Basic Training Program at the Federal Law Enforcement Training Center ("FLETC"). I currently serve as a Task Force Officer ("TFO") for the Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI") in Fort Lauderdale, Florida where I am assigned to the HSI Homeland Security Task Force ("HSTF") Maritime Smuggling Group and High Intensity Drug Trafficking Area ("HIDTA") of South Florida. HSTF and HIDTA are investigative entities that is comprised of law enforcement officers from various federal, state, and local law enforcement agencies who work together in a cooperative relationship. I am responsible for investigating matters within the jurisdiction of the United States Department of Homeland Security, to include violations of the immigration and customs laws of the United States. I have conducted several investigations involving maritime smuggling involving humans, narcotics, weapons, money, violent crimes, and organized criminal enterprises. I have received specialized training in narcotics investigations and identification as well as the laws to search and seizure. My law enforcement authority is derived from Title 14, United States Code, Section 525, which grants CGIS Special Agents law enforcement authority for any crime committed within the authority of the U.S. Coast Guard ("USCG").

2. This Affidavit is submitted in support of a criminal complaint charging Sherlinda JOSEPH, a.k.a. Chalinda JOSEPH ("JOSEPH"), Haitian citizen and alien who attempted to enter

the United States at any time or place other than as designated by immigration officers, in violation of Title 8, United States Code, Section 1325(a)(1).

3. The statements contained in this Affidavit are based on my personal knowledge, as well as information provided to me by other law enforcement officials and witnesses involved in this investigation. I have not included in this Affidavit each and every fact known to me. Rather, I have included only the facts that are sufficient to establish probable cause for the issuance of a criminal complaint against JOSEPH for the above-described criminal violations.

#### **PROBABLE CAUSE**

4. On or about January 23, 2026, at about 7:11 a.m., United States Coast Guard (“USCG”) Sector Miami Beach received a call from a good Samaritan (“GOODSAM”) boat captain that that reported a capsized vessel with five people in the water all wearing life jackets about 20 nautical miles (“NM”) off Fort Lauderdale, Florida. The capsized vessel had left Bimini, Bahamas on January 22, 2026, at approximately 7:00 p.m. Due to the sea conditions the GOODSAM was unable to recover rescue the people. USCG responded with a USCG rescue helicopter and USCG vessel recovering the five illegal aliens from the capsized vessel. The aliens advised the USCG that there was a sixth person reported to be the captain and smuggler operating the vessel that was a Bahamian adult male that was separated from the vessel when it capsized. The USCG conducted a Search and Rescue (“SAR”) for this missing person without locating him.

5. On or about January 24, 2026, the USCG landed JOSEPH in Broward County, Florida for medical evaluation and later released her to the U.S. Border Patrol (“USBP”) Dania Beach Station. At the USBP station, JOSEPH’s biographical and biometric information (her fingerprints and facial images) were entered into U.S. Department of Homeland Security (“DHS”) systems to include the USBP’s e3/NGI system and run through the automated biometric fingerprint

identification system (“IDENT”) and the Federal Bureau of Investigations integrated automated fingerprint identification system. These systems revealed that JOSPEH had not been previously admitted to the United States and did not have permission to be admitted into the United States of America. A records check confirmed JOSPEH did not have a valid U.S. visa or was ever issued one. Therefore, JOSPEH’s status is that of an alien as defined in 8 U.S.C. §1101(a)(3).

6. On or about January 25, 2026, 10:00 a.m., the USCG landed the remaining aliens at USCG Sector Miami Beach and transferred them to the USBP Dania Beach Station.

7. On January 25, 2026, at about 7:01 p.m., Special Agent’s (“SA”) David Franklin & Jose Arriaga, both Homeland Security Investigations interviewed JOSEPH. SA Franklin advised JOSEPH of her Miranda warning in the Haitian creole language. JOSPEH stated she understood her rights and voluntarily agreed to be interviewed. JOSEPH stated that she is from Haiti. She stated she had been in Bimini, Bahamas and that a friend told her of the smuggling vessel departing for Florida on the evening of Thursday, January 22, 2026. JOSEPH stated that she thought this would be a good idea on how to get to the United States of America. JOSEPH said that she was going to call her Haitian boyfriend that resides in the United States of America when she arrived but declined to provide his identity. JOSEPH stated that she believed the Bahamian captain of the vessel swam towards the United States of America after the vessel capsized. She admitted that she knew it was illegal for her to enter the United States of America this way and that she did not have permission to enter the United States of America.

8. On January 25, 2025, the other aliens on the capsized vessel were interviewed after being given and waiving their Miranda warning. One of the aliens was a Haitian male and he admitted that he paid \$6,000 U.S. dollars to go to the United States of America. In addition, the Haitian male stated that while on the vessel he saw lights and the shoreline, the captain of the

vessel stated that they were approaching the United States of America. Shortly thereafter, the captain of the vessel began directing the vessel in a zip zag pattern to avoid other boats that had lights. The Haitian male believed that the captain was making such maneuvers to avoid being detected. Another alien a Dominican Republic female, stated she had been in Bimini, Bahamas and paid \$8,000 U.S. dollars to be smuggled to the USA via a smuggling vessel that departed for Florida on the evening of Thursday, January 22, 2026.

9. Three of the five individuals rescued from the capsized vessel, were previously removed aliens from the United States of America who did not have permission from the Attorney General or the Director of the Department of Homeland Security to reenter the United States of America.

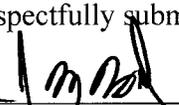
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**CONCLUSION**

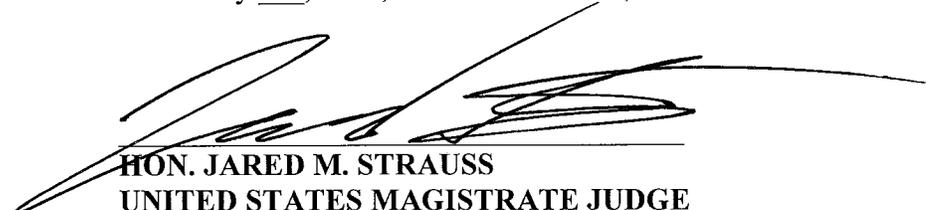
10. Based on the foregoing facts, your affiant respectfully submits that there is probable cause to believe that JOSEPH has violated Title 8, United States Code, Section 1325(a)(1), because she is an alien who was found entering or attempting to enter the United States at any time or place other than as designated by immigration officers. JOSEPH has demonstrated the capability and willingness to cross international boundaries in violation of the law endangering her life and others in the process.

**FURTHER YOUR AFFIANT SAYETH NAUGHT.**

Respectfully submitted,

  
\_\_\_\_\_  
James M. Head  
Special Agent  
Coast Guard Investigative Service  
& Homeland Security Investigations Task  
Force Officer

Subscribed and sworn to before me  
on January 27, 2026, in Fort Lauderdale, Florida

  
\_\_\_\_\_  
**HON. JARED M. STRAUSS**  
**UNITED STATES MAGISTRATE JUDGE**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

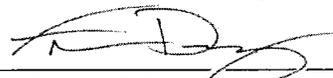
CASE NUMBER: 26-MJ-6042-JMS

BOND RECOMMENDATION

DEFENDANT: SHERLANDA JOSEPH, A.K.A. CHALINDA JOSEPH

Pre-Trial Detention

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By:   
AUSA: Felipe Plechac-Diaz

Last Known Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

What Facility: USBP Dania Beach Station  
1800 NE 7th Ave. Dania Beach

Agent(s): James M. Head, Coast Guard  
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)