

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Andres WILKINSON III

Defendant(s)

Case No. 5:26-mj-460

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 February 5, 2026 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section*Title 8 United States Code, Section
1324*Offense Description*

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A".

P Continued on the attached sheet.

/s/Juan Gonzalez*Complainant's signature*Juan Gonzalez, Special Agent*Printed name and title*

Submitted by reliable electronic means, sworn to, signature attester telephonically per Fed.R.Crim.P. 41:

Date: 02/07/2026Brian C. Bajew*Judge's signature*City and state: Laredo, TexasBrian C. Bajew, U.S. Magistrate Judge*Printed name and title*

Print

Save As...

Attach

Reset

IN RE: Andres WILKINSON III

I, Juan Gonzalez, declare and state as follows:

1. On April 23, 2025, the U.S. Customs and Border Protection (CBP) Office of Professional Responsibility (OPR) received information from Homeland Security Investigations (HSI) that Elva Edith Garcia-Vallejo, a nonimmigrant, was residing at [REDACTED], Laredo, TX, without legal authorization. Additionally, the information indicated that Garcia-Vallejo was living with her boyfriend, Supervisory CBP Officer (SCBPO) Andres Wilkinson, who was aware of her unlawful status in the United States.
2. SCBPO Wilkinson began his career as an Immigration Inspector on May 6, 2001, where his primary duties were enforcing immigration law. On April 15, 2007, he was promoted to CBP Enforcement Officer, where his duties included investigating and prosecuting immigration law violators. In February 2021, he was promoted to Supervisory CBPO, where his duties include overseeing the enforcement of customs and immigration laws.
3. CBP OPR determined that Garcia-Vallejo entered the United States on or about August 5, 2023, using her B1/B2 nonimmigrant visa number [REDACTED], and was issued an I-94 travel permit as a Temporary Visitor for Pleasure/Tourism to San Antonio, TX, with an expiration date of February 4, 2024 (I-94 admission number [REDACTED]).
4. Records show that Garcia-Vallejo had multiple entries into the United States up until December 24, 2023, at which time she began living in the U.S. with her husband, Juan Rodriguez, at an apartment [REDACTED] in Laredo, TX.
5. CBP OPR determined that Garcia-Vallejo last entered the U.S. on September 6, 2024, using her B1/B2 nonimmigrant visa number [REDACTED], and was issued an I-94 travel permit as a Temporary Visitor for Pleasure/Tourism to Eagle Pass, TX, with an expiration date of March 5, 2025 (I-94 admission number [REDACTED]).
6. On April 25, 2025, CBP OPR verified with U.S. Citizenship and Immigration Services (USCIS) that Garcia-Vallejo had been petitioned for on January 5, 2024, by her husband, Juan Rodriguez Jr. However, on April 8, 2025, USCIS closed the case after receiving a letter from Mr. Rodriguez canceling the petition.
7. On May 9, 2025, CBP OPR observed SCBPO Wilkinson meet with an adult female, later identified as Garcia-Vallejo, and her minor daughter at the Harmony School of Science parking lot in Laredo, TX.
8. On May 9, 2025, CBP OPR followed Garcia-Vallejo and her daughter, who drove away in a red 2024 Toyota Rav4 bearing Texas license plates [REDACTED] (registered to SCBPO Wilkinson), to [REDACTED] Laredo, TX. Garcia-Vallejo and her daughter exited the vehicle and entered the condominium.

9. On May 14, 2025, CBP OPR received law enforcement database research indicating that Garcia-Vallejo is SCBPO Wilkinson's niece. Garcia-Vallejo is the daughter of J. Santos Garcia-Moreno and Elva Vallejo-Arredondo. SCBPO Wilkinson listed J. Santos Garcia-Moreno as his brother in his 2023 background investigation.
10. On May 14, 2025, CBP OPR received information from USCIS that Garcia-Vallejo did not have any pending immigration applications.
11. From June 2025 to November 2025, CBP OPR conducted surveillance at [REDACTED] and observed a female, later identified as Garcia-Vallejo, entering and exiting the property.
12. On November 14, 2025, CBP OPR located a Toyota Tacoma bearing Texas license plate [REDACTED] (registered to SCBPO Wilkinson) at the Home Depot parking lot in Laredo, TX. CBP OPR then confirmed the driver was Garcia-Vallejo, accompanied by her daughters.
13. On February 5, 2026, CBP OPR approached and detained Garcia-Vallejo at [REDACTED], Laredo, TX. Garcia-Vallejo was then transported to the CBP OPR office [REDACTED] Laredo, TX, for an interview.
14. Under Miranda advisement, Garcia-Vallejo admitted that she had been living with her uncle, SCBPO Wilkinson, since on or about August 2024.
15. Garcia-Vallejo admitted that SCBPO Wilkinson had financially supported her by providing his credit cards, housing, and assistance with her financial obligations, including medical debt, and by adding her to his vehicle insurance.
16. Garcia-Vallejo admitted that SCBPO Wilkinson was aware that she was consulting with an immigration attorney to resolve her immigration status.
17. Garcia-Vallejo admitted that she knew the immigration petition filed by her husband for her to become a legal resident had been withdrawn.
18. CBP OPR conducted a consensual search of Garcia-Vallejo's phone, which displayed text conversations revealing that Garcia-Vallejo traveled to Eagle Pass, TX, on two occasions: once for the delivery of a swing set and a second time for SCBPO Wilkinson's daughter's birthday.
19. CBP OPR verified that SCBPO Wilkinson's daughter's birth date is [REDACTED]. Records revealed that a Toyota Tundra bearing Texas license plate [REDACTED], registered to SCBPO Wilkinson, crossed through the U.S. Border Patrol checkpoints between Laredo and Eagle Pass on September 8, 2024. Records also revealed additional crossings through the same checkpoints.
20. Garcia-Vallejo admitted to crossing the U.S. Border Patrol checkpoint in a vehicle driven by SCBPO Wilkinson. She stated this occurred on at least two occasions but did not recall the dates.

21. During the interview, Garcia-Vallejo was allowed the opportunity to search for immigration documents brought by SCBPO Wilkinson to CBP OPR. During the search, a document dated May 5, 2025, revealed that SCBPO Wilkinson confirmed to Border Region/Behavioral Health Center that Garcia-Vallejo and her daughters had been residing at his home as part of his household since December 7, 2024.
22. CBP OPR conducted a consensual search of Garcia-Vallejo's phone which revealed a photograph dated August 16, 2025, of SCBPO WILKINSON, Garcia-Vallejo, and Garcia-Vallejo's two daughters at the Ancira Chrysler Dodge dealership in San Antonio, TX posing with a red RAV4 and a gray Dodge Ram Truck.
23. CBP OPR database researched revealed that on August 16, 2025, SCBPO WILKINSON's red Toyota Rav 4 bearing Texas plates [REDACTED] traveled through the U.S. Border Patrol checkpoint on Highway 83, between Laredo and Carrizo Springs, TX.
24. IH35 highway cameras captured SCBPO WILKINSON's grey Dodge Ram truck bearing Texas plates [REDACTED] traveling south to Laredo, TX.
25. Based on the above facts and circumstances, there is probable cause to believe that SCBPO Wilkinson brought in, harbored, concealed, transported, and shielded an alien from detection, knowing or in reckless disregard of the fact that such entry, residence, or transportation would be in violation of Title 8, United States Code, Section 1324(a).

[END]