

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Michael Wayne VINES III

Case No.

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)

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 March 09, 2026 in the county of Webb in the Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324(a)(1)(A)(ii)

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:

Continued on Affidavit

[checked] Continued on the attached sheet.

/S/Anthony Guzman

Complainant's signature

Anthony Guzman

Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence,

Date: March 11, 2026

Judge's signature

City and state: Laredo, Texas

Christopher dos Santos, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT
In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Michael Wayne VINES III

Case Number:

On March 9, 2026, at approximately 3:30 p.m., a Border Patrol Agent (BPA) was performing roving patrol duties on the west access road of Interstate 35 (I 35) near mile marker (MM) 27, north of Laredo, Texas, in Webb County. The west access road runs parallel to I 35 and allows motorists to bypass the Laredo North Border Patrol Checkpoint (C 29), located on I 35 at MM 29. Based on the BPA's training and experience, Transnational Criminal Organizations frequently exploit this frontage road to transport undocumented non citizens further into the interior of the United States while attempting to evade detection. Normal traffic on this road typically consists of local ranchers and oil field workers operating work trucks and service vehicles.

While stationary near MM 27, the BPA observed a black Cadillac sedan bearing Texas license plate NRX5511 traveling northbound on the west access road. The vehicle immediately drew the BPA's attention because it did not match the usual traffic pattern for that roadway, which is generally limited to local ranch and oil field traffic rather than passenger sedans.

As the vehicle passed the BPA's location, the BPA observed the driver, later identified as Michael Wayne VINES III, gripping the steering wheel with both hands and his arms appearing stiff and locked straight. The driver avoided eye contact with the BPA and appeared nervous. The BPA also observed that the front passenger seat was unoccupied and that three male subjects were seated in the rear seat of the vehicle; sitting upright, not speaking to each other, and not interacting with the driver. Based on the BPA's training and experience, a non local sedan traveling on a checkpoint bypass route, combined with a single driver and all passengers clustered silently in the rear seat displaying rigid, non relaxed body language, is behavior commonly associated with human smuggling events.

The BPA then conducted a records check of Texas license plate through Laredo Sector Communications. The records check revealed that the vehicle was registered to an address in Scurry, Texas, near Dallas, Texas, and that the vehicle had no recorded prior crossings through the Laredo North Border Patrol Checkpoint (C 29). Based on the BPA's training and experience, smugglers frequently utilize vehicles registered far from the border region and choose routes that bypass established immigration checkpoints to avoid inspection.

The totality of the following factors formed reasonable suspicion that the vehicle was involved in an alien smuggling event:

1. The vehicle type and registration (a non local black Cadillac sedan registered near Dallas) were inconsistent with the typical local ranch and oil field traffic on the west access road.
2. The location of travel-on a known checkpoint bypass route paralleling I 35 near C 29.
3. The driver's nervous behavior, stiff posture, tight two handed grip on the steering wheel, and avoidance of eye contact with law enforcement.
4. The unusual seating arrangement, with the front passenger seat empty and all passengers seated in the rear, sitting rigidly and not interacting with each other or the driver.
5. The vehicle's lack of prior crossings through the Laredo North Border Patrol Checkpoint.

While both the BPA's service unit and the suspect vehicle continued northbound past MM 29 toward MM 32, the BPA observed the vehicle decrease speed after passing MM 29, further heightening suspicion that the driver was attempting to avoid detection near the checkpoint area. Based on the totality of the circumstances described above, the BPA suspected that the vehicle was being used to transport undocumented non citizens in furtherance of illegal entry into the United States and decided to conduct an immigration inspection.

The BPA advised Laredo Sector Communications that a roving patrol stop would be conducted and activated the marked service unit's emergency equipment. The black Cadillac sedan came to a complete stop near MM 30 on the west access road.

As the BPA exited the service unit and began approaching the vehicle, the BPA observed the rear doors of the vehicle open and

three subjects exit and flee on foot toward nearby ranchland. The BPA immediately notified additional agents via radio of a suspected alien smuggling event, advising that the driver was detained and that three subjects had bailed out of the vehicle. Multiple agents responded and began tracking the fleeing subjects on foot.

During the subsequent search, two subjects were located and apprehended in nearby ranchland. An immigration inspection revealed that the subjects were citizens of Mexico and were present in the United States illegally, with no lawful immigration documents permitting them to enter or remain in the United States. All subjects, including Michael Wayne VINES III, were placed under arrest and transported to the Laredo North Checkpoint (C 29) for further investigation.

At C 29, Michael Wayne VINES III was advised of his Miranda rights, which he acknowledged and waived by signing DHS Form I 214, agreeing to provide a statement without an attorney present. In a video recorded interview conducted in English, Michael Wayne VINES III stated that he resided in the Dallas, Texas, area and had recently been out of work. He explained that on or about March 7 or 8, 2026, he saw a video on TikTok soliciting drivers and contacted the poster.

According to Michael Wayne VINES III, the poster told him that he needed someone to drive people from Laredo, Texas, to San Antonio, Texas, and would provide payment per person. Michael Wayne VINES III agreed to these terms on the evening of March 8, 2026, and drove from the Dallas area toward Laredo on the morning of March 9, 2026.

Upon arriving near Laredo, Michael Wayne VINES III was directed to a parking lot as a meeting place. At approximately 3:00 p.m., a pickup parked next to his vehicle. Shortly thereafter, three subjects exited the pickup and entered the rear seat of Michael Wayne VINES III's black Cadillac sedan.

Michael Wayne VINES III admitted that at this point he realized and knew the subjects were undocumented non citizens and that he was being paid to transport them further into the United States. He stated that the poster then instructed him to drive northbound on I 35 toward San Antonio, Texas, exit I 35 at the 27 MM underpass to circumvent the Laredo North Border Patrol Checkpoint (C 29), and then reenter I 35 at MM 32. Michael Wayne VINES III followed these instructions and was traveling northbound on the west access road when he was encountered by the BPA.

In a separate, video recorded interview, material witness, Baudelio HERNANDEZ MORENO, an undocumented non citizen from Mexico who had been apprehended after fleeing from the vehicle, stated that he had traveled from San Luis Potosi to Monterrey, then to Nuevo Laredo, where he crossed the river into the United States with others and a guide. He reported walking for several hours before being picked up by a black vehicle and stated that his final destination was San Antonio, Texas, for which he had agreed to pay a smuggling fee of \$6,000 USD, of which \$1,000 had already been paid. HERNANDEZ MORENO described the driver of the black vehicle had been caught in as a young, Caucasian male, skinny, with a tattoo on his neck, who did not speak Spanish. When presented with a photo lineup, HERNANDEZ MORENO positively identified Michael Wayne VINES III as the driver.

Based on the totality of these facts—the reasonable suspicion leading to the roving patrol stop on a known checkpoint bypass route, the subsequent flight of passengers from the vehicle, the confirmation that the passengers were undocumented non citizens, the post Miranda admissions by Michael Wayne VINES III that he knowingly agreed to transport undocumented non citizens for payment and deliberately circumvent the checkpoint, and the positive identification of Michael Wayne VINES III by HERNANDEZ MORENO as the driver of the smuggling event—there is probable cause to believe that Michael Wayne VINES III knowingly transported undocumented non citizens in furtherance of their illegal presence in the United States, in violation of federal law.

SUBSCRIBED and SWORN to before me on

11th day of March, 2026

Signature of Judicial Officer

/S/ Guzman, Anthony Border Patrol Agent
Signature of Complainant