

FILED

July 13, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

BY: lad
DEPUTY

UNITED STATES OF AMERICA

Plaintiff

V.

CECILY ANN AGUILAR

Defendant

* CRIMINAL NO. W-20-CR-097
 *
 * SUPERSEDING INDICTMENT
 *
 * [VIO: COUNT ONE: 18 U.S.C.
 * 1512(c)(1) and (k) – Conspiracy to Tamper
 * with Documents or Proceedings; COUNT
 * TWO and COUNT THREE: 18 U.S.C.
 * 1512(c)(1) – Tampering with Documents or
 * Proceedings; COUNT FOUR, COUNT
 * FIVE and COUNT SIX: 18 U.S.C. 3 –
 * Accessory After the Fact; COUNT SEVEN:
 * 18 U.S.C. 1519 – Destruction, Alteration or
 * Falsification of Records in a Federal
 * Investigation; COUNT EIGHT, COUNT
 * NINE, COUNT TEN, and COUNT
 * ELEVEN: 18 U.S.C. 1001 – False
 * Statement or Representation]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. 1512(c)(1) and (k)]

Beginning on or about April 22, 2020 and continuing until on or about July 1, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

did unlawfully and knowingly combine, conspire, confederate, and agree with another person to corruptly alter, destroy, mutilate, and conceal any record, document and other object, to wit: the body of V.G., and did attempt to do so, with the intent to impair its integrity and availability for use in an official proceeding, to wit: a United States Army Court-Martial of A.R., a Federal grand jury investigation of A.R. and Defendant and a Federal criminal trial of A.R. and Defendant in a United States District Court, contrary to Title 18, United States Code, Section 1512(c)(1);

It was part of the conspiracy that Defendant and another person, A.R., would separate and tear apart the body of V.G., destroying some of it and concealing the remainder; would obtain, dispose of and destroy recorded information, instruments and objects used in the commission of these acts; and would make false statements concerning these acts; all in order to prevent A.R. and Defendant from being charged with and prosecuted for any crime in a United States Army Court-Martial of A.R., a Federal grand jury investigation of A.R. and Defendant and a Federal criminal trial of A.R. and Defendant in a United States District Court .

All in violation of Title 18, United States Code, Section 1512(k).

COUNT TWO
[18 U.S.C. 1512(c)(1)]

On or about April 23, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

did corruptly alter, destroy, mutilate, and conceal any record, document and other object, to wit: the body of V.G., and did attempt to do so, with the intent to impair its integrity and availability for use in an official proceeding, to wit: a United States Army Court-Martial of A.R., a Federal grand jury investigation of A.R. and Defendant and a Federal criminal trial of A.R. and Defendant in a United States District Court, in violation of Title 18, United States Code, Section 1512(c)(1).

COUNT THREE
[18 U.S.C. 1512(c)(1)]

On or about April 26, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

did corruptly alter, destroy, mutilate, and conceal any record, document and other object, to wit: the body of V.G., and did attempt to do so, with the intent to impair its integrity and availability

for use in an official proceeding, to wit: a United States Army Court-Martial of A.R., a Federal grand jury investigation of A.R. and Defendant and a Federal criminal trial of A.R. and Defendant in a United States District Court, in violation of Title 18, United States Code, Section 1512(c)(1).

COUNT FOUR
[18 U.S.C. 3]

On or about April 22, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

knowing that an offense against the United States has been committed, to wit, murder within the special maritime and territorial jurisdiction of the United States, did receive, relieve, comfort, and assist the offender, A.R., in order to hinder and prevent the offender's apprehension, trial, and punishment, by obtaining masonry cement for use in concealing the body of V.G., in violation of Title 18, United States Code, Section 3.

COUNT FIVE
[18 U.S.C. 3]

On or about April 23, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

knowing that an offense against the United States has been committed, to wit, murder within the special maritime and territorial jurisdiction of the United States, did receive, relieve, comfort, and assist the offender, A.R., in order to hinder and prevent the offender's apprehension, trial, and punishment, by separating, tearing apart, destroying and concealing the body of V.G., in violation of Title 18, United States Code, Section 3.

COUNT SIX
[18 U.S.C. 3]

On or about April 26, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

knowing that an offense against the United States has been committed, to wit, murder within the special maritime and territorial jurisdiction of the United States, did receive, relieve, comfort, and assist the offender, A.R., in order to hinder and prevent the offender's apprehension, trial, and punishment, by separating, tearing apart, destroying and concealing the body of V.G., in violation of Title 18, United States Code, Section 3.

COUNT SEVEN
[18 U.S.C. 1519]

Beginning on or about April 22, 2020 and continuing until on or about April 26, 2020, in the Western District of Texas, the exact date unknown to the grand jury, Defendant,

CECILY ANN AGUILAR,

did knowingly alter, destroy, mutilate, conceal, and cover up information contained in a Google account of A.R., a record, document and tangible object, with the intent to impede, obstruct, and influence the investigation and proper administration of the inquiry into the disappearance of V.G., a matter that the defendant knew and contemplated was within the jurisdiction of the United States Army Criminal Investigation Command (also known as CID), a department and agency of the United States, in violation of Title 18, United States Code, Section 1519.

COUNT EIGHT
[18 U.S.C. 1001]

On or about May 19, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: Defendant stated, in summary, that A.R. was with her at her apartment during the late evening of April 22nd through the early morning of April 23rd, 2020, said statement being made to an agent of the United States Army Criminal Investigation Command (also known as CID) and to a task force officer of the Bureau of Alcohol, Tobacco, Firearms and Explosives, at Sun Mart, Killeen, Bell County, Texas, in the Waco Division of the Western District of Texas. The statements and representations were materially false because, as Defendant then and there knew, during the time described, she and A.R. were at another location separating, tearing apart, destroying and concealing the body of V.G, in violation of Title 18, United States Code, Section 1001.

COUNT NINE
[18 U.S.C. 1001]

On or about June 19, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: Defendant stated, in summary, that A.R. was with her at her apartment during the late evening of April 22nd through the early morning of April 23rd, 2020, said statement being made to an agent of the United States Army Criminal Investigation Command (also known as CID) and to a task force officer of the Bureau of Alcohol, Tobacco, Firearms and Explosives, at Sun Mart, Killeen, Bell County, Texas, in the Waco Division of the Western District of Texas. The statements and representations were materially false because, as Defendant then and there knew,

during the time described, she and A.R. were at another location separating, tearing apart, destroying and concealing the body of V.G, in violation of Title 18, United States Code, Section 1001.

COUNT TEN
[18 U.S.C. 1001]

On or about June 20, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,

did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: Defendant stated, in summary, that she and A.R. went out for a drive and watched the stars during the late evening of April 22nd through the early morning of April 23rd, 2020, said statement being made to an agent of the United States Army Criminal Investigation Command (also known as CID), at Fort Hood, Texas, in the Waco Division of the Western District of Texas. The statements and representations were materially false because, as Defendant then and there knew, during the time described, she and A.R. were at another location separating, tearing apart, destroying and concealing the body of V.G, in violation of Title 18, United States Code, Section 1001.

COUNT ELEVEN
[18 U.S.C. 1001]

On or about June 30, 2020, in the Western District of Texas, Defendant,

CECILY ANN AGUILAR,


did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the

United States, to wit: Defendant stated, in summary, that she and A.R. went out for a drive and looked at the stars during the late evening of April 22nd through the early morning of April 23rd, 2020, said statement being made to an agent and to a task force officer of the United States Marshals Service, at Sun Mart, Killeen, Bell County, Texas, in the Waco Division of the Western District of Texas. The statements and representations were materially false because, as Defendant then and there knew, during the time described, she and A.R. were separating, tearing apart, destroying and concealing the body of V.G, in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:


FOREPERSON

ASHLEY C. HOEF
UNITED STATES ATTORNEY


By: MARK L. FRAZIER
Assistant United States Attorney