

AO 91 (Rev. 08/09) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT

for the

Western District of Texas

December 12, 2025

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

BY: Myrna Gallegos

DEPUTY

United States of America)
v.)
Francisco YEPSON Scobell)
)
)
)
)

Case No. **EP-25-MJ-6813-ATB**

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 December 11, 2025 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:

Code Section
Title 31 United States Code 5332

Offense Description
With the intent to evade a currency reporting requirement under Title 31 united States Code Section 5316, defendant(s) knowingly concealed approximately \$12.090.00 in United States currency or other monetary instruments on their person, in any conveyance, article of luggage, merchandise, or other container, and transports or transfers or attempts to transfer the currency from a place outside the United States to a place within the United States in violation of Title 31 united States Code, Section 5332.

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

David Marroquin, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/12/2025



Judge's signature

City and state: El Paso, TX

Anne T. Berton - U.S. Magistrate Judge

Printed name and title

Complaint sworn to telephonically on
December 12, 2025 at 01:13 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

AFFIDAVIT

On Thursday, December 11, 2025, at approximately 3:25 p.m., Customs and Border Protection Officers (CBPO) assigned to the Anti-Terrorism Contraband Enforcement Team (A-TCET) were conducting outbound operations at the Ysleta (YSL) Port of Entry (POE) in El Paso Texas when they encountered a blue in color 2010 Dodge Charger bearing Texas License Plate HJF0676. The vehicle was selected for an enforcement inspection by one of the A-TCET officers working the passenger lanes. The A-TCET Officer approached the vehicle on the driver's side and noticed it was occupied by two male subjects. The driver was later identified as Samuel YEPSON Scobell and the front seat passenger was later identified as Francisco YEPSON Scobell.

A-TCET Officer asked the driver where they were going, driver replied they were going to Ciudad Juarez. A-TCET Officer asked what his relationship was to the passenger and where they were coming from. Driver stated Francisco YEPSON Scobell was his brother and they were coming from El Paso. A-TCET Officer asked driver what was his occupation. Driver replied he was truck driver. A-TCET Officer then directed his attention at Francisco YEPSON Scobell and since he presented a Border Crossing Card to the officers, A-TCET Officer asked when was the last time he crossed into El Paso. Francisco Yepson Scobell stated yesterday (12/10/2025). When asked what he did for a living, he told the A-TCET Officer he was an engineer. A-TCET Officer then asked both occupants how much money were they traveling with. Driver of the vehicle responded he only had approximately \$300.00 Mexican Pesos and Francisco YEPSON Scobell stated he had no money on him. A-TCET Officer then advised both occupants that it was not illegal to travel into Mexico with \$10,000.00 or more in United States Dollars (USD), all they had to do was report it. Both driver and passenger of vehicle made no change to their previous currency declaration. A-TCET Officer asked both occupants of the vehicle if they had any weapons or ammunition. Both subjects replied no. A-TCET Officer referred the vehicle and occupants to outbound secondary for further inspection.

Once at secondary, both subjects were asked to exit the vehicle. A-TCET Officer at secondary then approached Francisco YEPSON Scobell and asked him if he had any money. Francisco YEPSON Scobell replied he had a few dollars. A-TCET Officer asked what he meant by a few dollars and if it was an excess of \$10,000.00 USD. He replied no. Francisco YEPSON Scobell was asked to show the A-TCET Officer all the money he had on him. Francisco YEPSON Scobell presented a few dollars he had in one of his front pockets and approximately 200 USD he retrieved from his wallet. A-TCET Officer asked if he had any other currency on him, Francisco YEPSON Scobell replied no.

At that point both occupants of the vehicle were told to stand side by side and the assistance of an assigned currency, firearms and ammunition canine was requested. After a sweep of both occupants, K9 "Ciri" alerted to Francisco's boot. A-TCET Officer asked if there was money in his boot. Francisco YEPSON Scobell stated yes and began removing his boot. When asked how much money he was hiding in his boot, Francisco YEPSON Scobell replied he had approximately \$2,000.00 USD. An immediate pat down

of the person was also conducted, resulting in the discovery of a large amount of USD found in the inner pocket of Francisco YEPSON Scobell's jacket. At that point A-TCET Officers handcuffed Francisco and escorted him to Passenger Control Secondary (PCS) for a pat down and further investigation. A total of \$12,090.00 USD was found and obtained by A-TCET Officers.

Homeland Security Investigations (HSI) Special Agents (SAs) were requested to the YSL POE. HSI Special Agent responded to the YSL POE to assist with the investigation.

HSI SA provided Francisco YEPSON Scobell with a Miranda Rights form in the Spanish language. Francisco YEPSON Scobell stated he understood his rights by signing and stated he was willing to talk to Agents without an attorney present.

During the interview of Francisco YEPSON Scobell, he stated he was living in Dalhart, Texas since his last crossing into the United States in 2024. Francisco YEPSON Scobell stated for approximately two years now he was working as a truck driver in order to financially provide for his wife and two daughters who currently reside in Chihuahua, Mexico. Francisco YEPSON Scobell stated on 12/10/2025, he traveled to El Paso, Texas to eventually meet up with his brother, driver of the vehicle. Francisco YEPSON Scobell stated he was traveling back to Mexico in order to be with his family over the holidays and he was going to travel back to Mexico with his brother. Francisco YEPSON Scobell stated on today's date, 12/11/2025, both he and his brother decided to do some Christmas shopping around El Paso before heading back to Mexico. Once they were finished with their shopping they decided to go to the Ysleta Port of Entry in order to make their way back south into Ciudad Juarez. Francisco YEPSON Scobell stated that is when CBP Officers approached them and asked them if they had anything to declare, specifically money. Francisco YEPSON Scobell admitted to lying about carrying any money at primary and failing to declare the total currency during secondary inspection. HSI Agent asked if the officers notified him that it was not illegal to carry more than 10 thousand dollars, that all he needed to do was report it. Francisco YEPSON Scobell replied yes and stated he still chose not to declare the money. HSI Agent asked if he knew about the reporting requirement prior to their stop at the Ysleta Port of Entry. Francisco YEPSON Scobell replied yes. HSI Agent then asked if he knew about the reporting requirements, why did he still lie and tried to hide the money. Francisco YEPSON Scobell could not really tell Agent why he did what he did, he just stated he felt as if it would be easier if he kept quiet about the money that way they would be released as fast as possible and eventually be allowed to continue with their travels back to Mexico. Francisco YEPSON Scobell added he and his brother are not criminals and are honest individuals, therefore he did not think it was a big issue when he decided not to declare the money. HSI Agent asked Francisco YEPSON Scobell who the money belonged to. Francisco YEPSON Scobell stated it was all his money and that it was money he was saving up from his earnings while working in Dalhart.

Case was presented to duty Assistant United States Attorney and eventually, Francisco YEPSON Scobell was arrested for 31 USC 5332, Bulk Cash Smuggling and booked into the El Paso County Detention Facility.

A total of \$12,090.00 USD was found and seized by Custom and Border Protection Officers.

Because this affidavit is being submitted for limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.