

**UNITED STATES DISTRICT COURT**

for the  
**Western District of Texas**  
Pecos Division

United States of America )  
v. )  
Jackie Nichole HALL (1) )  
John Christopher RAMIREZ (2) )  
\_\_\_\_\_)  
*Defendant(s)*

Case No. **PE: 24-MJ-325**

**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 07/07/2024 in the county of Presidio in the  
**WESTERN DISTRICT OF TEXAS**, the defendant(s) violated:

*Code Section*

*Offense Description*

8 U.S.C. 1324(a)(1)(A)(ii) & (B)  
(i) (1-2)

Defendants Jackie Nichole HALL & John Christopher RAMIREZ did knowingly transport  
Illegal Aliens within the United States for financial gain

18 U.S.C 111(a)(1)  
(1)

Defendant 1, Jackie Nichole HALL, did forcibly assault, resist, oppose, impede, intimidate  
or interfere, by making physical contact, with a person designated in section 1114 of this  
title while engaged in or on account of the performance of official duties.

This criminal complaint is based on these facts:

Continued on the attached sheet.

*Will Werner*

*Complainant's signature*

**Will Werner, Special Agent, HSI**

*Printed name and title*

**Complaint sworn to telephonically and  
electronically signed on this date.  
FED.R.CRIM.P. 4.1(b)(2)(A)**

Date: 07/09/2024

*David B. Fannin*

*Judge's signature*

City and state: Pecos, Texas

**Honorable Judge David B. Fannin**

*Printed name and title*



## AFFIDAVIT

On July 7, 2024, at approximately 2100 hours, United States Border Patrol Agents (BPA) from Presidio Station were notified via covert technology located near the Rio Grande River of possible illicit activity in a location slightly east of Presidio, TX. During this same time and near the same area, BPAs observed a red in color Kia sedan traveling eastbound along FM 170 E. A short time later, the same Kia was observed traveling westbound along FM 170 E. FM 170, commonly referred to as River Road, runs parallel to the Rio Grande River, the divide between the United States and Mexico. In certain areas along FM 170, the Rio Grande River is merely feet away. The proximity of FM 170 to Mexico has turned this road into one of the most notorious smuggling routes in the Big Bend area. BPAs conducted a registration check on the Kia revealing it was registered out of Odessa, TX. BPAs subsequently conducted a vehicle stop on the Kia to perform an immigration inspection on its occupants.

After pulling over onto the right shoulder, BPAs observed both rear doors of the Kia open and five (5) subjects abscond from the vehicle. BPAs approached the Kia and observed the driver, later identified as John Christopher RAMIREZ, and front seat passenger, Jackie Nichole HALL, both United States citizens, were still seated in the Kia. RAMIREZ and HALL were later transported to the Presidio Border Patrol Station for further investigation.

Homeland Security Investigations (HSI) responded to the Presidio Border Patrol Station to initiate their investigation.

HALL was read her Miranda Statement of Rights. HALL understood her rights and agreed to make a statement. HALL stated she and RAMIREZ traveled from Odessa to the Presidio area for some alone time together. HALL further stated she wanted to observe the sunset in "Big Bend." When asked where in the "Big Bend" she was going to watch the sunset, HALL didn't have an answer and later said "we were gonna drive in a little ways and fool around." Shortly after arriving in the Presidio area around 2000 hours, HALL stated she and RAMIREZ pulled over on the shoulder of the road, began watching the sunset and "were about to do some of that fooling around." When asked about partaking in sexual activity near the highway with limited privacy, HALL responded, "Sometimes people like a little danger." HALL then stated several people appeared from the nowhere, opened the doors to the Kia and entered the vehicle, and instructed RAMIREZ to "drive." HALL stated she and RAMIREZ were both in fear, so they adhered to the demands and drove the unknown subjects towards Presidio. HALL suspected the subjects were illegals because only one spoke English.

During the investigation, an HSI Special Agent (SA) requested HALL provide consent to examine her cellular phone. HALL consented and the HSI SA began reviewing the phone. In the recent call log, there was a contact saved as "Boss" who had been in contact with HALL. The phone number to boss was a Mexican number. HALL stated "Boss" was really her cousin and his nickname since they were children. When asked where her cousin lived, HALL stated it was the Mexican town nearby of Nuevo Laredo. Though HALL stated she hadn't seen her cousin in fifteen years, she stated they communicate frequently via phone.

At the end of the interview, while the HSI SA was holding HALL's phone in his right hand, HALL aggressively reached out and attempted to take her phone from the SA. While doing so, HALL grabbed the SA's hand, physically assaulting him. When HALL was taken back to her holding cell, she forcefully threw a partially full water bottle at the SA.

RAMIREZ was read his Miranda Statement of Rights. RAMIREZ understood his rights and agreed to make a statement. RAMIREZ stated he and HALL traveled from Odessa to Presidio to smuggle undocumented non-citizens (UNC's). According to RAMIREZ, this was going to be he and HALL's fourth time in the Big Bend area smuggling UNCs. On the three prior occasions, RAMIREZ stated he and HALL smuggled the UNCs through the United States Border Patrol checkpoint in Alpine, TX and to Odessa. On this occasion, RAMIREZ stated he and HALL were instructed to drop off the UNCs south of the Marfa checkpoint. The UNCs would then circumvent the checkpoint and be picked up by RAMIREZ and HALL upon arriving at the undetermined pickup location along the highway. RAMIREZ stated HALL was coordinating the human smuggling scheme with an unidentified subject in Mexico. On their prior trips, RAMIREZ stated HALL was being paid approximately \$2000.00 per smuggled UNC. RAMIREZ stated he personally was not being paid and was simply helping HALL by driving the smuggling vehicle.

I make this affidavit on the basis of my personal knowledge and information furnished to me by other law enforcement officers.

**WILLIAM S** Digitally signed by  
**WERNER JR** WILLIAM S WERNER JR  
Date: 2024.07.08  
14:13:05 -05'00'

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Will Werner  
HSI Special Agent