

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

ARGENTINA JUAREZ-LOPEZ,

Defendant

Case No. 5:25-MJ-270 (TWD)

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 September 4, 2025 in the county of Cayuga in the Northern District of New York the defendant violated:

Code Section

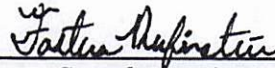
Title 8, United States Code, Section
1326(a)

Offense Description

Reentry of Removed Alien

This criminal complaint is based on these facts:
See Attachment

Continued on the attached sheet.



Complainant's signature

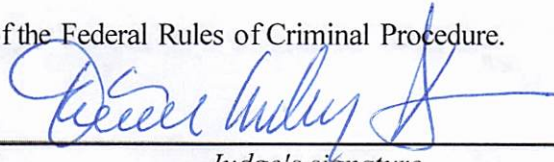
Foster Rubinstein, Border Patrol Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date:

Sept 8, 2025



Judge's signature

City and State: Syracuse, New York

Hon. Therese Wiley Dancks, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I am an agent with Customs and Border Protection, assigned to the United States Border Patrol. I have been working in this capacity for approximately 2 years. I make this affidavit in support of a criminal complaint for a violation of Title 8, United States Code, Section 1326(a) against Argentina JUAREZ-Lopez. This affidavit is based upon information I reviewed and/or received from law enforcement colleagues and immigration database checks. It sets forth probable cause regarding the alleged offense but does not set forth all information known to law enforcement regarding the Subject.
2. On September 4, 2025, Argentina JUAREZ-Lopez was encountered at the Nutrition Bar Confectioners (NBC) at 12351 State Route 34, Cato, New York (Cayuga County) during the execution of a federal search warrant as part of an HSI-led investigation. While on-scene, Agents detennined that JUAREZ-Lopez is a citizen of Guatemala and is present in the United States illegally. JUAREZ-Lopez was transported to the Oswego Border Patrol Station for further processing.
3. At the Oswego Border Patrol Station, record checks revealed that JUAREZ-Lopez was found to be in the United States illegally on or about 5/22/2024 near Sasabe, Arizona by immigration officials. JUAREZ-Lopez received a final order of removal on 5/31/2024. On or about 6/14/2024, JUAREZ-Lopez was removed from the United States on an ICE flight from Harlingen, Texas to Guatemala.
4. Records checks have confirmed that JUAREZ-Lopez has never applied for or received permission to reenter the United States from the Attorney General or the Secretary of the Department of Homeland Security, after being removed on 6/14/2024.
5. Based on the records of the Department of Homeland Security, as well as the defendant's presence in Cato, New York on September 4, 2025, there is probable cause to conclude that the defendant illegally reentered the United States subsequent to her removal on 6/14/2024, without the express permission of the Attorney General or Secretary of the Department of Homeland Security, in violation of Title 8, United States Code, Section 1326(a)