

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

Jennifer Gonzalez, Erica Daniels, Cherice Alejandro,
Amara Pugh, Jessica Tavares, and Jaylin Hill

Case No. 26-MJ-8433-PGL

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 Unknown Start Date to Present in the county of Bristol in the
District of Massachusetts, the defendant(s) violated:*Code Section**Offense Description*

8 U.S.C. § 1324(a)(1)(A)(iii)	Haboring Illegal Aliens
8 U.S.C. § 1324(a)(1)(A)(v)(I)	Conspriacy to Harbor Illegal Aliens
8 U.S.C. § 1325(c)	Marriage Fraud
18 U.S.C. § 371 and 8 U.S.C. § 1325(c)	Conspriacy to Commit Marriage Fraud

This criminal complaint is based on these facts:

See affidavit of Homeland Security Investigations (HSI) Special Agent Christopher Womersley.

☒ Continued on the attached sheet.*Complainant's signature*

Christopher Womersley, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: _____

*Judge's signature*City and state: Boston, MA

Hon. Paul G. Levenson

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Christopher Womersley, being sworn, depose and state as follows in support of my application for a complaint charging Jennifer GONZALEZ, Erica DANIELS, Cherice ALEJANDRO, Amara PUGH, Jessica TAVARES, and Jayln HILL with: (1) Harboring Illegal Aliens, in violation of 8 U.S.C. § 1324(a)(1)(A)(iii); (2) Conspiracy to Harbor Illegal Aliens, in violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I); (3) Marriage Fraud, in violation of 8 U.S.C. § 1325(c); and (4) Conspiracy to Commit Marriage Fraud, in violation of 18 U.S.C. § 371 and 8 U.S.C. § 1325(c).¹

INTRODUCTION

1. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I am a Special Agent with Homeland Security Investigations (“HSI”) and have been so employed since September 2025. I received training at the Federal Law Enforcement Training Center, Criminal Investigator Training Program, and Homeland Security Investigations Special Agent Training. I am presently assigned to the HSI office in Boston, Massachusetts. In 2007, prior to becoming a Special Agent, I completed six months of training at the Federal Law Enforcement Training Center (“FLETC”) for the United States Border Patrol (“USBP”) Academy

¹ I am aware that harboring, within the meaning of § 1324, encompasses conduct substantially facilitating an alien’s remaining in the United States illegally and preventing government authorities from detecting his unlawful presence. Illegal harboring may encompass a wide range of conduct, including sham wedding ceremonies. *See, e.g., United States v. Kim*, 193 F.3d 567, 572 and 574 (2d Cir. 1999) (citations omitted); *United State v. Ozcelik*, 527 F.2d 88, 99 (3rd Cir. 2008) (“Convictions under § 1324 generally involve defendants who provide illegal aliens with affirmative assistance, such as shelter, transportation, direction about how to obtain false documentation, or warnings about impending investigations” and including examples, such as, “arranging sham marriage for illegal aliens”). Under § 1325(c), any “individual who knowingly enters into a marriage for the purpose of evading any provision of the immigration laws” has committed a federal crime.

in Artesia, New Mexico. I have conducted hundreds of arrests, participated in dozens of criminal cases, conducted numerous surveillance operations, and drafted numerous warrants. I served various roles in USBP, including Field Training Officer, All-Terrain Vehicle Unit, Coastal Border Enforcement Team, and Prosecutions Officer, working on both the Southern and Northern Border. In 2019, I completed three months of FLETC training for the United States Citizen and Immigration Services (“USCIS”) and USCIS’s Fraud Detection and National Security (“FDNS”) in Charleston, South Carolina. As an Immigration Officer (“IO”) with USCIS, FDNS, I conducted hundreds of interviews and administrative investigations related to immigration fraud. I also worked at USCIS FDNS Head Quarters and assisted with numerous national investigations, serving as an immigration subject matter expert.

2. The information contained in this affidavit is based on my own investigation, oral and written reports by other law enforcement officers, physical surveillance, information from confidential informants and cooperating witnesses, public records, database checks, mobile phone location information, and other investigations. The word “agent” or “investigator” is used in this affidavit for all federal, state, and local law enforcement officers, as well as administrative officers involved in the enforcement of immigration laws. The dates and times in this affidavit are approximate. This affidavit is submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrants for Jennifer GONZALEZ, Erica DANIELS, Cherice ALEJANDRO, Amara PUGH, Jessica TAVARES, and Jayln HILL. Because this affidavit is submitted for the limited purpose of supporting the issuance of a criminal complaint and arrest warrants, I have not set forth every fact learned during the investigation or recounted every investigative technique employed. Rather, I am only setting forth information necessary to support probable cause for the issuance of the complaint.

BACKGROUND

3. In summer 2026, HSI learned of an ongoing conspiracy to harbor illegal aliens in the United States through marriage fraud. Investigators learned that an operation led by Jennifer GONZALEZ, a United States citizen, had been responsible for a multi-year conspiracy in which GONZALEZ arranged for American citizens to fraudulently marry illegal aliens for the purpose of illegally obtaining United States immigration benefits for the illegal aliens, including Permanent Resident cards (also known as “green cards”) and potential U.S. citizenship.

4. HSI, USCIS, the U.S. Department of Labor - Office of Inspector General, the United States Department of Agriculture, the U.S. Department of Housing and Urban Development, and the United States Postal Inspection Service have been involved in a joint investigation of GONZALEZ and her co-conspirators. Per the ongoing investigation, GONZALEZ is the leader of a large marriage fraud conspiracy involved in fraudulently obtaining United States immigration benefits for illegal aliens (both men and women) in Massachusetts. During the investigation, in a recorded meeting, GONZALEZ told a cooperating witness (“CW-1”) that she and her group had obtained hundreds of green cards (U.S. Permanent Resident cards) for illegal aliens in Massachusetts. GONZALEZ said that she charged between \$38,000 and \$40,000 per illegal alien to arrange for the sham marriages in Massachusetts, while also securing additional payments for her fellow conspirators who participated in the sham marriages. Based on the investigation, GONZALEZ’s conspiracy has been ongoing for approximately twelve years, and the operation averages approximately 18 to 20 illegal marriages per year. Based on her own admissions, and other financial evidence, GONZALEZ has been making hundreds of thousands of dollars a year over at least the last ten years. GONZALEZ, who lives in Fall River, Massachusetts, has said in recorded conversations that she has purchased property and other assets for herself and

her children in the Dominican Republic, which GONZALEZ has referred to in those recorded conversations as “my country.”

I. THE DEFENDANTS

5. GONZALEZ is 43 years old and resides at 529 Warren Street, Apt #2, Fall River, Massachusetts. GONZALEZ has a criminal history in Massachusetts that includes the following convictions: a 2016 conviction for Assault and Battery for which she was sentenced to one year of incarceration; a 2013 conviction for multiple counts of Identity Fraud and Fraud for which she was initially sentenced to probation, which she violated, and was then sentenced to eighteen months of incarceration; a 2011 conviction for Illegal Entry without Breaking In and Possession of Burglarious Tools, which ultimately resulted in her being sentenced to two years of incarceration; and a 2010 conviction for Knowingly Receiving Stolen Property for which she was sentenced to probation.

6. Erica DANIELS is 29 years old and resides at 299 Sunset Hill, Fall River, Massachusetts.

7. Cherice ALEJANDRO is 39 years old and resides at 529 Warren Street, Apt #1, Fall River, Massachusetts. Based on statements by GONZALEZ, ALEJANDRO is GONZALEZ’s sister-in-law.

8. Jessica TAVARES is 31 years old. Based upon a review of benefits records and police records, investigators believe that TAVARES presently resides at 16 Hebron Avenue, Apt #2R, Attleboro, Massachusetts; she previously resided in Fall River.

9. Amara PUGH is 31 years old. Investigators believe that she resides at 69 Mott Street, Fall River, Massachusetts.

10. Jayln HILL is 26 years old and is presently incarcerated in the Massachusetts state system. HILL has a criminal history that includes: (1) a 2026 firearms conviction for which he was sentenced to three and one half years to five years of incarceration; (2) a 2022 conviction for Assault and Battery with a Dangerous Weapon for which he was sentenced to six months of incarceration; and (3) a 2021 conviction for Assault and Battery/Pregnant Victim and Intimidation for which he was sentenced to eighteen months of incarceration after violating probation. Based on intelligence gathered during the course of the investigation, agents believe that HILL is a member of the Larry Boy Gangster Disciples.

PROBABLE CAUSE

11. As part of its investigation into the illegal activities of the defendants, federal investigators have utilized a cooperating witness (“CW-1”) and a source of information of information (“SOI-1”). SOI-1 is a Brazilian national with no criminal record who voluntarily reported to HSI that he had illegally sought to obtain United States immigration benefits by paying GONZALEZ and her co-conspirators to facilitate a fraudulent marriage with defendant Erica DANIELS.² CW-1 has cooperated with government agencies in the past for monetary considerations. The government anticipates that it may similarly provide CW-1 with monetary benefits in this case. CW-1 has provided accurate information in the past to federal investigators, including the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). CW-1 was introduced to GONZALEZ by SOI-1 as a Brazilian national without legal right to be in the United States. As detailed below, CW-1 has engaged in the process of arranging for a fraudulent marriage with defendant Cherice ALEJANDRO, whom agents believe is GONZALEZ’s sister-in-law.³

² Prior to her “marriage” with SOI-1, DANIELS married an illegal alien in Massachusetts and sought to obtain immigration benefits on behalf of that illegal alien as confirmed by filings with USCIS.

³ ALEJANDRO has been previously married twice to illegal aliens in and has sought to obtain immigration benefits

12. Based immigration records, on October 16, 2019, in Fall River, GONZALEZ married an individual whom I will refer to as “J.P.”⁴ J.P. is a Brazilian national who had no legal right to be in the United States at the time of the marriage to GONZALEZ. On or about February 10, 2009, J.P. had been ordered removed from the United States by an Immigration Judge—this order was upheld on appeal. J.P. continued to reside in the United States despite the order of removal. GONZALEZ filed a Form I-130 petition (or “Petition for Alien Relative”) seeking to change J.P.’s status to allow J.P. to remain in the United States. The basis for the Petition was GONZALEZ’s alleged marriage to J.P.⁵ Based on the investigation, agents have determined that GONZALEZ’s marriage to J.P. was fraudulent and entered into for the purpose of illegally obtaining immigration benefits for J.P.

13. GONZALEZ stated in a recorded meeting with CW-1 in 2026 that she had been in a long-term relationship with E.D., who had recently died (E.D. died at the end of 2025 per a Fall River Police Department report). GONZALEZ also stated in a recorded meeting with CW-1 that: “I was married to my husband for 23 [years]. So all of my little babies that belong to my ... big rooster.” GONZALEZ further stated: “I don’t want no man. I don’t wanna have to have a boyfriend. I was married for 20 plus years.”

for the two illegal aliens based on their alleged “marriages” as confirmed by filings with USCIS.

⁴ Throughout this affidavit, whenever I refer to either one of the five defendants, or any of the individuals identified herein only by their initials, I know that person’s actual name and identity based on multiple sources. This includes agents comparing their faces from surveillance and by reviewing video and photographs captured during the investigation to: (1) images maintained by the Massachusetts RMV; (2) images on other forms of identification, such as United States passports; (3) images contained in federal immigration filings; and (4) images and other identifying information maintained in public benefit applications. Agents also corroborated information about the defendants’ addresses through federal immigration records, local police reports, public benefit applications and other local public reports.

⁵ GONZALEZ and J.P. were scheduled for interviews with USCIS on August 27, 2026, in connection with GONZALEZ’s Form I-130 Petition for Alien Relative. Neither party showed up for the interviews. The petition was denied on September 15, 2026, per USCIS records.

14. Investigators have also interviewed several witnesses who confirmed that GONZALEZ lived with E.D., and not J.P., following the marriage between GONZALEZ and J.P. The fact that GONZALEZ and J.P. did not reside together, despite their alleged marriage, was also confirmed by home visits conducted by USCIS investigators.

15. From July 2019 through July 2026, GONZALEZ applied for benefits from the Massachusetts Department of Transitional Assistance (“MDTA”) to receive Supplemental Nutrition Assistance Program (“SNAP”) benefits. GONZALEZ filed several applications for SNAP benefits during this period. During this seven-year period of seeking SNAP benefits, GONZALEZ did not list J.P. as being in her household and claimed to have never been married.

I. THE FRAUDULENT MARRIAGE INVOLVING SOI-1 AND DANIELS

16. In July 2026, SOI-1 provided information to investigators regarding GONZALEZ, known to him as “Jenny.” SOI-1 stated that “Jenny” was operating in the Fall River area of Massachusetts and was arranging sham marriages for illegal aliens to obtain immigration benefits in the United States. SOI-1 provided an address for “Jenny” in Fall River, which is consistent with GONZALEZ’s present address where she has been observed by federal agents. SOI-1 also provided phone information for GONZALEZ which has been verified.

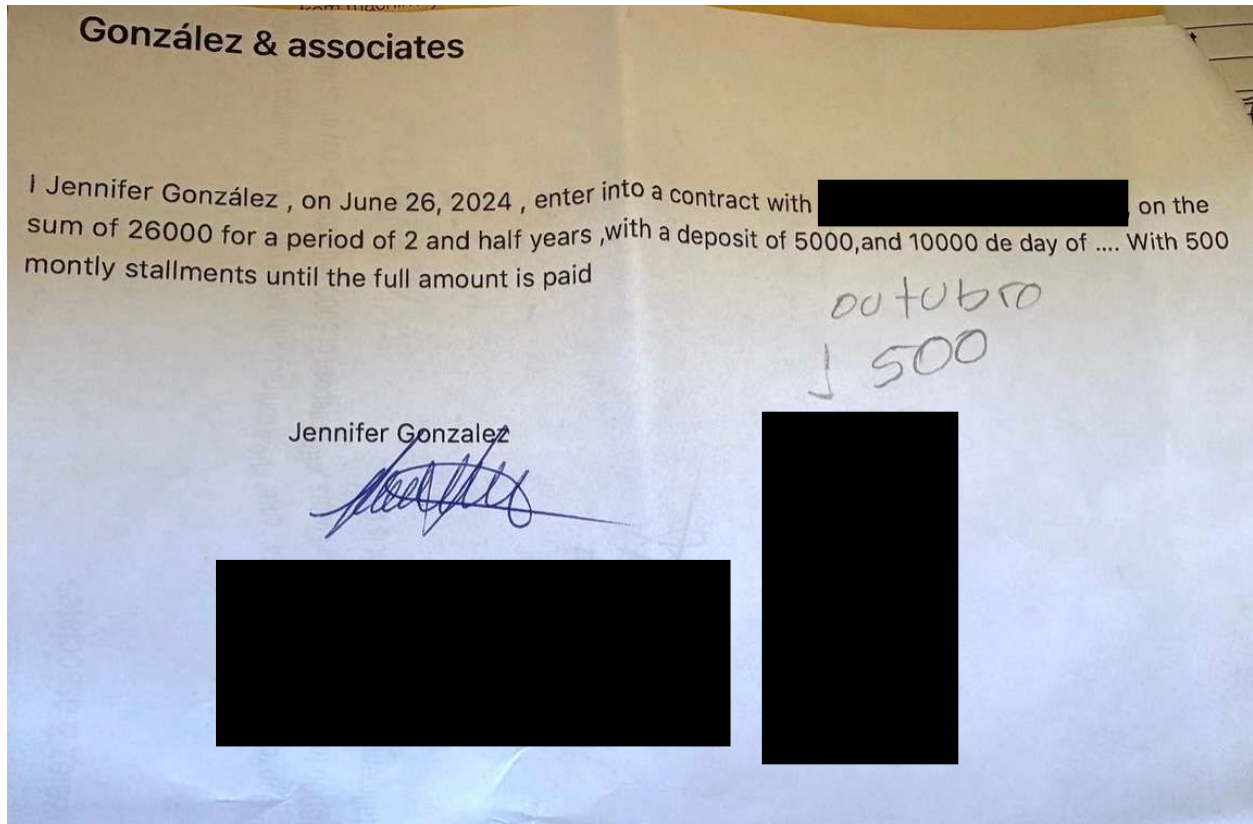
17. SOI-1 told investigators that, in or about 2019, he entered the United States on a temporary B1 visa to finish school but worked instead and overstayed his visa. SOI-1 said that, in or around 2024, an Uber driver told SOI-1 that a woman named “Jenny” could find him someone to marry for immigration benefits and gave SOI-1 Jenny’s phone number. SOI-1 said he texted Jenny explaining that he wanted to remain in the United States.

18. SOI-1 told agents that GONZALEZ arranged a video call with him and sent him pictures of four eligible women, with their W-2 pay and tax documentation, who would be used

to facilitate a sham marriage for immigration fraud purposes. SOI-1 said that GONZALEZ required \$5,000 in cash up front for this part of the service, which SOI-1 delivered to her residence at 529 Warren Street in Fall River, Massachusetts. SOI-1 informed investigators that he paid GONZALEZ in cash earned while working construction jobs.

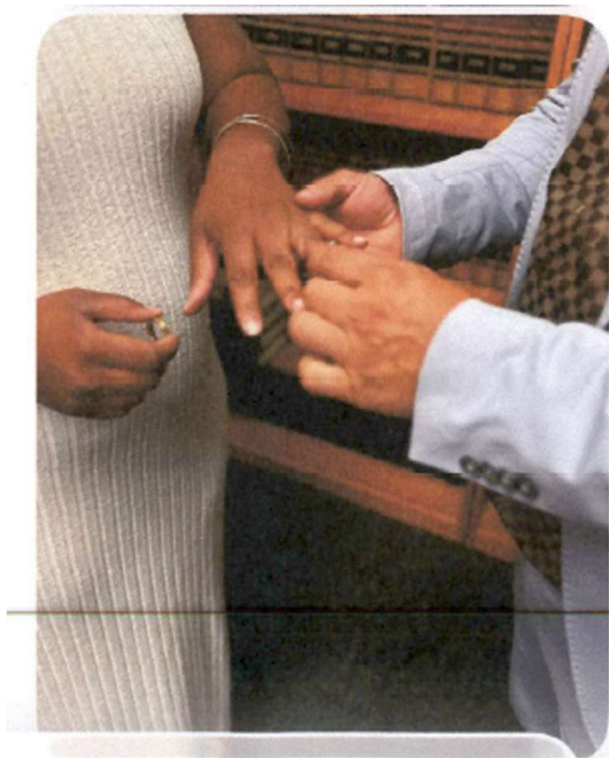
19. SOI-1 told agents that he ultimately chose defendant Erica DANIELS from the list of four candidates to participate in the fraud. SOI-1 said that DANIELS agreed to marry him to commit marriage fraud and told SOI-1 she would require \$500 monthly payments from SOI-1 while they remained married as part of the ongoing fraud.

20. SOI-1 and GONZALEZ entered into a “contract” memorializing their financial arrangement for the fraudulent marriage. As discussed below, CW-1 received a similar contract from GONZALEZ to facilitate his illegal marriage. SOI-1 provided investigators with the contract between GONZALEZ and SOI-1 and an image of the contract is set forth below. On the contract, in pencil, there is a reference to “Outubro 500” (“October 500” in Portuguese)—which is consistent with the electronic messages below between SOI-1 and DANIELS indicating that SOI-1 was required to pay DANIELS \$500 per month for the duration of their sham marriage.



21. On or about August 22, 2024, SOI-1 was “married” to DANIELS by the City Clerk of Fall River. This has been confirmed by marriage records. Below are images, recovered from SOI-1’s mobile phone, of the sham marriage which, according to SOI-1, were taken for the purpose of supporting immigration filings for the benefit of SOI-1.





22. Documents were filed with USCIS to start the process for SOI-1 to receive immigration benefits based on his fraudulent marriage to DANIELS. As part of the immigration proceedings, DANIELS and SOI-1 were interviewed by USCIS investigators on June 11, 2025. USCIS investigators determined that DANIELS' answers had various discrepancies. Following the interview, federal investigators reviewed the alleged marriage between DANIELS and SOI-1 and determined that DANIELS and SOI-1 never resided together despite being married. On December 4, 2025, during the investigation, DANIELS withdrew the Form I-130 she had filed seeking a permanent residency for SOI-1 in the United States.

23. SOI-1 provided investigators with electronic communications between SOI-1 and DANIELS demonstrating the fraudulent nature of their "marriage." In this regard, the communications make clear that DANIELS was not living with SOI-1 and was engaged in a purely financial arrangement with him rather than a valid marriage. For example, on September 24, 2024, the two had the following exchange:

Daniels: I'm not meeting up to do anything until I've been paid.

I told Jenny [GONAZALEZ] that and have been trying to work with her so we can figure it out without drama but now she been ignoring me for two days.

SIO-1: I don't know what the Treaty was that you did with her but I've already paid her \$12,000 and I still have more. Money to pay her. The monthly Treaty at the end of October starts at \$500 and I have more. \$2,300 to give her at the end of the month only.

I would really like to send the documentation to immigration before the end of the month, because politics will come into play and maybe the government will change the system. ... And I would really like to submit the documentation. That's why I would like to take a picture with you. Because last time I paid I gave \$7,000 dollars.

I'm not questioning anything. And I know you have nothing to do with it. But I told you I was going to throw a party last week. I spent \$1,000. I made decorations and bought meat, I invited friends with a couple to take pictures with us. I invited you and she, no one answered me. Both of them literally left me hanging. But ok, I'm doing my part and I'm going to do my part.

I can go there this weekend, we can go to a restaurant somewhere, talk, take a picture. And then things will happen, they will happen, you know, it will work out.

I understand you perfectly. I'm not just telling you things, I'm not fighting. And I'm not blaming you for anything, okay?

Daniels: I got \$4000

She's was supposed to give me \$1000 more and I agreed to wait until October to start the 500. I was sick the day of the party and told her that.

24. On or about September 16, 2024, the two had the following exchange:

Daniels: Jenny [GONZALEZ] called me she said you wanted to meet to give me the 1000 and add me to your bank at citizens

SOI-1: How can we do this today? What time are you available?

Because we set a time. To meet in front of the bank because you have to be the main account holder, since the house address is in your name. I don't have any address. In your location. So you open as the first holder and I as the secondary.

25. On or about September 18, 2024, SOI-1 and DANIELS discussed the payment schedule for her monthly payment to act as his sham wife:

Daniels: Also we didn't speak about this yesterday but starting October 1st can you make sure I get my payment on the 1st of the month

SOI-1: Good morning, how are you? I had spoken to Jenny that I can make all the payments at the end of the month, but the beginning of the month is very difficult for me.

26. On or about November 5, 2024, SOI-1 texted DANIELS asking for various documents for immigration filings. SOI-1 offered DANIELS another \$200 to send the documents: "I'll give 200 more besides the 500 [monthly payment of \$500] ok." DANIELS responded: "Ok." DANIELS then added: "And I want a perfume for my birthday ... In December." She further noted: "I'll pick it and let you know what I want." SOI-1 agreed to give DANIELS \$200 in December to buy herself a birthday gift.

27. Investigators have determined that, during her alleged marriage to SOI-1, DANIELS applied for benefits from the MDTA to receive SNAP benefits. From January 2025 through August 2026, DANIELS filed multiple applications for SNAP benefits. During this period of seeking SNAP benefits, DANIELS did not list SOI-1 as being in her household and claimed to have never been married.

A. Daniel's Prior Sham Marriage in 2021

28. In addition to the sham marriage to SOI-1, the investigation revealed that DANIELS had been involved in at least one prior sham marriage pursuant to GONZALEZ's ongoing fraudulent operation.

29. On or about August 16, 2021, DANIELS married E.M.B. in New Bedford, Massachusetts. At the time of the marriage, E.M.B. had no lawful immigration status in the United States. Per DHS records, E.M.B. was a Brazilian national who claimed to have entered the United States without inspection on February 12, 2020, from Mexico; DHS has no record of E.M.B. having lawful admission into the United States.

30. Based on their marriage, on September 6, 2022, DANIELS filed a Form I-130 (Petition for Alien Relative) with USCIS on behalf of E.M.B. seeking federal immigration benefits. Investigators determined that the alleged marriage upon which the immigration benefits were sought was fraudulent based on housing information provided by DANIELS in the petition. Per the petition, DANIELS falsely claimed to be living with E.M.B. in Hyannis, Massachusetts. Based on Fall River Police Department reports and information from the Fall River Housing Authority, at the time she claimed to be living with E.M.B. in Hyannis, DANIELS was living in a Fall River Housing Authority housing development.

31. Per public records, DANIELS and E.M.B were divorced on or about June 15, 2024 (*approximately one month before her marriage to SOI-1*). Investigators determined that from August 2021 through June of 2024, DANIELS filed multiple applications to the MDTA for SNAP benefits. During this three-year period of seeking SNAP benefits, DANIELS did not list E.M.B as being in her household and she claimed to have never been married.

32. On July 31, 2023, the Form 1-130 filed by DANIELS was approved USCIS, and E.M.B received a Permanent Residency in the United States based on his sham marriage with DANIELS.

33. Investigators determined that a TD Bank checking account, which had E.M.B. and DANIELS listed on it, had nine Zelle transactions with “Jennifer Gonzalez” from September 14, 2021, through April 23, 2023, which paid “Jennifer Gonzalez” a total of \$5,823.

II. CW-1’s PLANNED MARRIAGE FRAUD WITH ALEJANDRO

A. CW-1’s Introductory Calls with Gonzalez

34. Investigators had SOI-1 introduce CW-1 to GONZALEZ as a potential client. On June 16, 2026, SOI-1 called GONZALEZ to discuss her facilitating a sham marriage for CW-1 so that CW-1 could fraudulently obtain United States immigration benefits.

35. On July 16, 2026, CW-1, working with agents, made a consensually recorded call to GONZALEZ to discuss arranging for a fraudulent marriage. GONZALEZ told CW-1 that she preferred to meet in person to initiate a relationship but would proceed by phone. GONZALEZ said that she was “very good at this”—referring to marriage fraud for the purposes of illegally obtaining immigration benefits—and that she had been involved in arranging these sham marriages for more than ten years.

36. GONZALEZ inquired about CW-1's age and current immigration status.

GONZALEZ warned CW-1 that, under the new administration, immigration laws/proceedings were stricter: "I've been doing this for more than ten years ... I've had very ... I've had a very successful career, and that I don't have a problem. This is something that I'm very good at that that should not be a problem. Um, as long as you want as, as long as you're willing to do the work. It is, it's, it's manageable, it's doable. But you have to know that this is something that is not just gonna happen overnight. Like, we're in a new government, things are a little bit more difficult, things a little bit more straightforward, and it's something very delicate. So, it's something that if you're going to do it you have to take it serious. It's not, and I'm not saying this to you. I just say this in a general sense to everybody." GONZALEZ further stated: "In order for me to be safe, I gotta make sure that you're safe. So, we both gotta make sure that everything's done correctly."

37. GONZALEZ then asked CW-1 if he was working with any lawyers regarding immigration issues. GONZALEZ noted that she worked with a couple of lawyers that had assisted her in the past. GONZALEZ further stated: "They know what we're doing" and "the lawyer knows the deal."

38. GONZALEZ explained that CW-1 and his sham wife had to establish various accounts to give an appearance of a legitimate marriage, including a life insurance policy and joint bank accounts. When CW-1 raised concerns about the process and said he would need GONZALEZ's aid in doing it correctly, GONZALEZ replied: "That is my job. That is, that is my job, my darling. That is my job."

39. GONZALEZ told CW-1 that her usual charge for her illegal services was \$40,000, but she would agree to a reduced price for CW-1 of \$38,000. GONZALEZ also told

CW-1 that additional payments would need to be made to his “wife.” She said: “So, we do monthly, we do monthly payments. We do monthly payments. I can break them down to you for monthly payments. You’re, you’re going to be married with your partner for three years. Okay? Three to three and a half maximum time. Um, okay. But that’s something that I’d like to discuss in person.” CW-1 asked GONZALEZ jokingly: “What if she falls in love with me?” GONZALEZ said it was a business and CW-1 would have a contract with GONZALEZ. GONZALEZ added: “We’re not here for love.”

40. GONZALEZ explained that CW-1’s sham wife had to be around 35-40 years old to avoid suspicion. GONZALEZ noted that the woman with whom CW-1 was eventually paired would determine the additional payment amount owed to her by CW-1. GONZALEZ stated that she had three potential candidates in CW-1’s age range and that she would provide CW-1 with W-2s from the candidates because it was important that they had stable jobs.

41. GONZALEZ further stated:

You’re not gonna see anything for the first year. You’re gonna submit a lot of documents. You’re gonna submit ... before you submit documents ... we prepare ourself after you get married. That is the first step. If you don’t get married, we cannot do anything. You know what I mean? Because ... bank accounts, life insurance, all that, apartment lease, you know, probably getting a cell phone together, making sure they, you know, you guys, you make sure you get a passport for your wife, you know what I mean? And stuff like that. Then we put all of our case together and we make sure that it goes into immigration. Preparing for that. It can take up to three, four months because remember you have to open bank accounts, life insurance, you have to wait for all those paper works to come back.

GONZALEZ told CW-1 that she could guide him through obtaining life insurance and lawyers because she has experience. GONZALEZ explained: “That’s why you pay me the big bucks.” GONZALEZ advised that it would be better if CW-1 did not have sex with his sham wife to avoid circumstances becoming messy.

42. GONZALEZ warned CW-1: “I am pretty busy. I do have a lot of clients and I do not like to play. I like to come do my business. We get it done and out [of] the way. I don’t like to string things because there is people who makes me do that. And one month later, we still asking questions. We have, you know what I mean? Like, if you come in and meet me, okay? I need you to come prepare my darling. I need you to come with your little list. You know, put notepad, pull out your phone, make sure the questions you wanna ask, and I will gladly answer them to you.” GONZALEZ then reassured CW-1: “Understand, I’m here for you to get the American Dream and keep on moving and do what you wanna do in life.”

43. On June 22, 2026, CW-1 had a second consensually recorded call with GONZALEZ. CW-1 asked about his potential “wife” and whether she had been married in the past. GONZALEZ stated that she had been married once but “not for documents [immigration documents] as much as I know.” This was false. CW-1’s potential “wife,” defendant ALEJANDRO, had been in at least two prior fraudulent marriages as discussed below.

44. GONZALEZ reassured CW-1 that “[t]hese girls are very, very vetted” and that the proposed “wife” was CW-1’s “best option.” She said: “Everything qualifies. Because let me tell you something. If, if just for a couple, um, for their taxes, she needs around \$27 to \$29,000. She made \$42,000, 40, almost \$43,000. That puts you on more than this scale. More than the 125% that they ask.” GONZALEZ told CW-1: “Put a lot of money together. ’Cause your angel’s [referring to GONZALEZ] gonna cost you a lot of money.” GONZALEZ further stated: “... [T]rust me, just put a lot of dollars together. ’Cause you’re gonna need it, but in the end it’s going to be worth every single dollar.”

B. CW-1's Initial Meeting with GONZALEZ Regarding the Fraudulent Marriage

45. On or about August 6, 2026, CW-1 visited GONZALEZ at her residence at 529 Warren Street in Fall River to meet his proposed sham wife, to discuss the arrangements for the fraudulent marriage, and to make an initial cash payment to GONZALEZ for arranging the fraudulent marriage (the "August 6 Meeting"). The "wife" proposed by GONZALEZ was defendant ALEJANDRO. Investigators surveilled CW-1 to 529 Warren Street, GONZALEZ's residence in Fall River. Investigators observed GONZALEZ and ALEJANDRO at the residence and took photographs of both of them outside of the residence. CW-1 was equipped with audio/video recording equipment and consensually recorded his meetings with GONZALEZ and ALEJANDRO. CW-1's undercover vehicle was also equipped with audio/video recording equipment.

46. ALEJANDRO has two prior marriages in 2018 and 2023 involving Brazilian nationals who had no legal status in the United States at the time that they married ALEJANDRO. Immigration investigators have subsequently determined that both of these marriages were fraudulent. The first marriage was to G.G. and took place on May 1, 2018, per public records. They were divorced on May 23, 2023. The second marriage was to V.M. and took place on July 3, 2023. They were divorced on May 15, 2026, per public records.

47. Investigators determined that ALEJANDRO applied to the MDTA for SNAP benefits during both of these alleged marriages. ALEJANDRO filed several applications for SNAP benefits during the two marriages. Investigators have identified that ALEJANDRO did not list G.G. or V.M. as being in her household and claimed to have never been married.

48. GONZALEZ lives in a multi-family residence at 529 Warren Street in Fall River. GONZALEZ told CW-1 that ALEJANDRO would be moving into the apartment below

GONZALEZ's apartment in the near future. Based on the investigation, ALEJANDRO has lived with GONZALEZ and her family in the past, including during periods in which ALEJANDRO claimed to be married and living with her "husband" at a different location.

49. During the August 6 Meeting, GONZALEZ described the various things needed to support the sham marriage to file for United States immigration benefits. For example, GONZALEZ suggested taking pictures to make it appear that the two were in an actual relationship. She explained: "Just take a picture. Alright? Not people taking pictures of you guys. No ... selfies. Couples now just take selfies. They don't live by other people taking pictures ... You know what I mean? So, as more natural as we can do it, it's the be it's, it's the way that I like to do it, you know? Okay. I, I, I like to manage it that way because that way we know that we are creating a story. So, not only the story we have to say, now we have to, I have to come up with an idea of, okay, now how you guys met, you know."

50. GONZALEZ told CW-1 that the wedding could be done at City Hall: "[Y]ou will spend less getting married at the city, city hall, then doing something. Yeah. And it's the same thing. Now, if you decide to do like a dinner party one day, you can definitely do it that it's necessary. No, you dress nice. She dress nice. We bring some flowers and we take cute pictures. When you guys come out, we can go to a restaurant if you feel like it. We can sit in a restaurant and you know, she can bring a few friends. I can go, you can go. You can ask [SOI-1]."

51. GONZALEZ explained to CW-1: "So we go to the city hall and you can do it there [i.e., get legally married]. And then we can go to a restaurant [i.e., to take pictures for the immigration proceedings]. We're gonna call it a day ... Um, the most important of getting out of that day is the marriage certificate. That is the most important thing. Okay. You know, uh, and

they give you a piece of paper with a stamp and with the, you know, everything on it that is needed. And that is part of the doc. That is the first document we will need for immigration ... And after that, we start building all of our documents. Now, like I said, our contract is for the next three years. She [ALEJANDRO] knows that for the next three years, um, she's gonna be stuck to you. Anything that it needs to be done [i.e., for the immigration filings], it will be done. I know she's very good at communication because when I text her, it doesn't take her five minutes, 10 minutes."

52. GONZALEZ also explained:

Now I wanna ask, and I want you to be clear on something also, bro, I will make a contract, but in this contract, ***I never mention a wife also because I like to keep them as safe as I can when it comes to a contract*** ... If something would do to happen, I prefer me being the one involved because again, why would I involve them? Okay? ... I make a contract between you and I, how do we explain this contract as this is a loan. Right? ***Because I can't put in a contract that, you know, rep purchasing a wife for immigration purposes because it will be pretty bad. Okay. It'll be pre... that's calling incriminating.*** But let's say something happens, you know, oh, I loaned her money and you know, I want my money because that's usually what it ends at about the money. Okay. Okay. That's why when they ask me for a contract, I'll be like, I don't have a problem. Because if you're putting your trust on me with money, you know, I, and I'm providing my services. I don't want you to think that I'm just gonna walk out with your money. (emphasis added)

53. During the August 6 Meeting, GONZALEZ told CW-1 that her ongoing conspiracy had resulted in the issuance of "hundreds" of green cards to aliens. GONZALEZ also stated:

I'm not in a rush. Okay. That [the initial payment of \$3,000] is securing my girl. Okay. And I'm gonna tell you why I do that. I stopped doing weddings in 2025. I, no, 24, the end of 20, 24 ... My husband got sick. But also that's when Trump was becoming a president, you know, and submitted, there was a lot of immigration powers. So ... I ... what I did was my batch of people. I married them, I make sure they have their documents. And I didn't work 2025 because immigration was a little bit harsh. But, I had a lot of people that came sit with me in a restaurant, sit

with me in my old office ... 'cause I did have an office up the street. I did ... And they will come, I will present them the wife, they like, yes, I want them. Not a problem. I'll be back in, I don't know, three weeks and they will leave and hold, make me hold these girls for months and then they will lose money. ... 'cause why do you think they get married? Because they need the money. Yeah. You know what I mean? It's not to play.

54. GONZALEZ told CW-1 that they would enter into a fake contract as a means of memorializing their illegal scheme and that CW-1 would need to make an initial payment of \$3,000, which he did that day with money provided by the investigators. GONZALEZ explained:

Now, I hold the \$3,000 until the day that you get married. And then I put it together on the whole amount. Okay. You know, that guarantees me, you know, like you can say in a, in a, in a week you can say, Jenny, I don't want to get married. Can I please have my money back? Not a problem. I give you your money back because it's all about the word, you know? ... I like to keep my word and I like my client to keep their word. So, this is just more of a technicality ... And that's why I went between you and I. Okay. You and I are the ones in this contract, not nobody else ... *'cause we don't want [to] get your wife and yourself into a, put it in paper about a fake marriage.* You know what I mean? Does that make sense to you? Yep. 'cause if anything happened, *we don't want them to have any proof that this was fake.* You and I could have had any type of relationship and you could have known legal money. (emphasis added).

GONZALEZ clarified that she would take care of the initial payments to CW-1's "wife": "I take care of payment of your wife. Okay. Your wife. That's it. That the initial payment pays your wife."

55. GONZALEZ asked CW-1 to try and get a Massachusetts driver's license. GONZALEZ explained:

You have your Brazilian license, that is more than perfect. You can drive with an international license in here. You cannot just tell them that you've been here for more than three months. Because I believe if you move from another country, do you know that is it, it is a nine-month, it's a six months or three months. Think six months. I think it's six months. You can legally drive with your Brazilian license here for up to a certain amount of time without getting is okay. Alright. Alright. And also, you know that Massachusetts, it saves a safe haven for immigration ... immigrants, right?

You can get a license here. ... You could never tell that from the truth [a license involving a United States citizen], but yes. But this is a sanctuary ... Massachusetts.”

56. When CW-1 asked if he could get a Massachusetts driver’s license, GONZALEZ replied: “[L]et me find out for you. Alright. Because I believe that you, you can. Okay. Because this state is a sanctuary. Alright? Like, Trump doesn’t like this state because the government from here, the, the state defends us very much. Okay. So that, that is a good, I’m gonna find out about the, about the license. I’m gonna call my friend because I know that she knows about that.” CW-1 replied: “Massachusetts the best place.” GONZALEZ agreed: “Massachusetts is the best place for you to be. That is a fact.” GONZALEZ also told CW-1: “You get health insurance. Um, you get a lot of help as an immigrant here.”

57. During the August 6 Meeting, GONZALEZ told CW-1 that she had invested in property and businesses in the Dominican Republic: “I had a car rental situation going on. That was for like two years. But when my husband died, I sold all the cars and just didn’t want none to deal with that problem. Um, I have businesses in my country [i.e., the Dominican Republic], like I have like, um, like a supplier for small stores ... Like little corner stores and stuff like that. And every time I have a, a spare dollar, I just invest in a new property in my country. That’s what I really do. I like to buy land ... Like I have a lot of land in my country.” GONZALEZ further stated: “My kids love my country. My kids love to vacation down there. Alright. So, when they grow up, they’ll each have a land, they’ll have some.”

58. During the meeting, GONZALEZ and ALEJANDRO had a problem printing the contract between GONZALEZ and CW-1. GONZALEZ called “Amara” to get assistance printing the contract between GONZALEZ and CW-1. Investigators have identified “Amara” as defendant Amara PUGH based on immigration filings submitted by PUGH, which included

images of her on identity documents. GONZALEZ referred to PUGH as her “secretary” and stated that she was primarily responsible for generating contracts. GONZALEZ complained that PUGH had put a lock on the printer which was preventing them from printing the contract. GONZALEZ stated: “My, my, my secretary, there’s the one who do my document. She has a lock of a freaking thing. Why? She like a code. She’s on her way here real quick.” GONZALEZ also stated that PUGH “just had a baby, so she’s on maternity leave.” PUGH arrived at GONZALEZ’s residence and tried to get a contract printed. During the meeting in GONZALEZ’s residence, PUGH confirmed she was “the secretary” for GONZALEZ. Eventually, the group agreed that the contract would need to be printed at a nearby Staples store. CW-1, ALEJANDRO, and GONZALEZ traveled to the nearby Staples store. Federal investigators surveilled the three to the store.

59. The following are still shots from the video regarding the printing of the contract at GONZALEZ’s residence in Fall River, Massachusetts.

Image 1

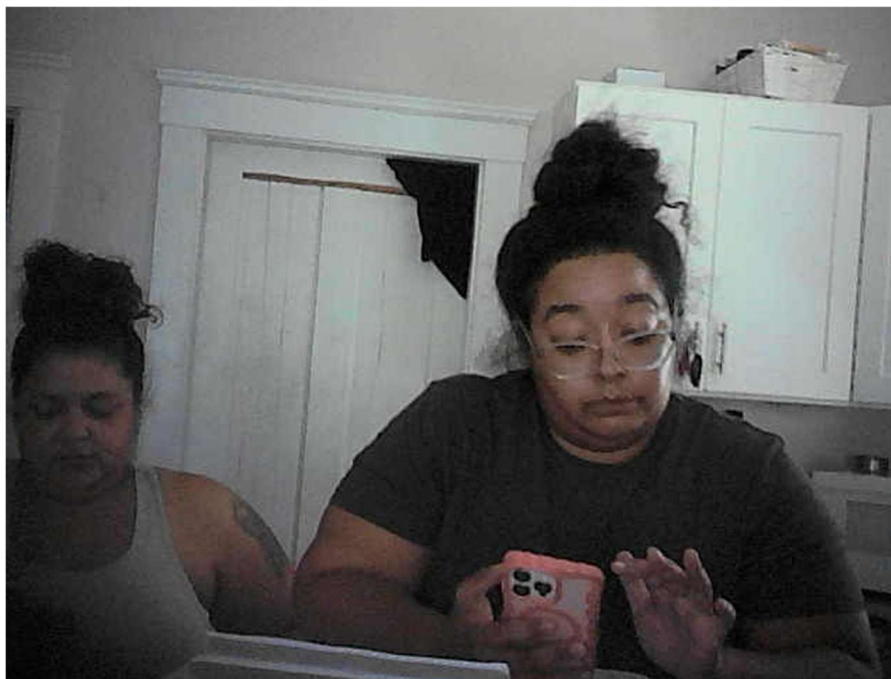




Image 2

The first image includes ALEJANDRO in grey and PUGH in a dark shirt. The second image includes both ALEJANDRO in grey and PUGH in a dark shirt with GONZALEZ on the far right.

60. Set forth below are additional still images from one of the video recordings of the August 6 Meeting. These still images involve the signing of the contract and initial payment of \$3,000 to GONZALEZ, which took place in CW-1's car outside the Staples store where they printed the contract. The first image shows GONZALEZ signing the contract in the backseat with ALEJANDRO in the passenger seat. The second image shows CW-1 signing the contract. The third image shows GONZALEZ keeping a copy of the contract with her mobile phone. Images four through nine show the initial payment of \$3,000 in cash being made by CW-1 to GONZALEZ.



Image 1



Image 2



Image 3

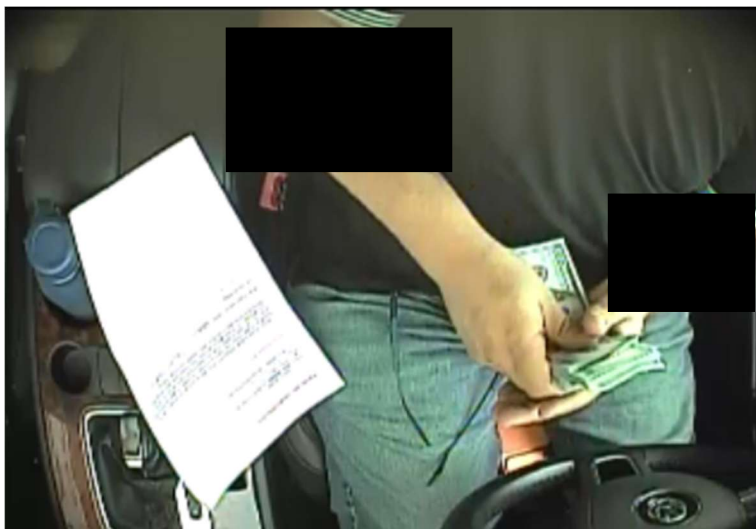


Image 4

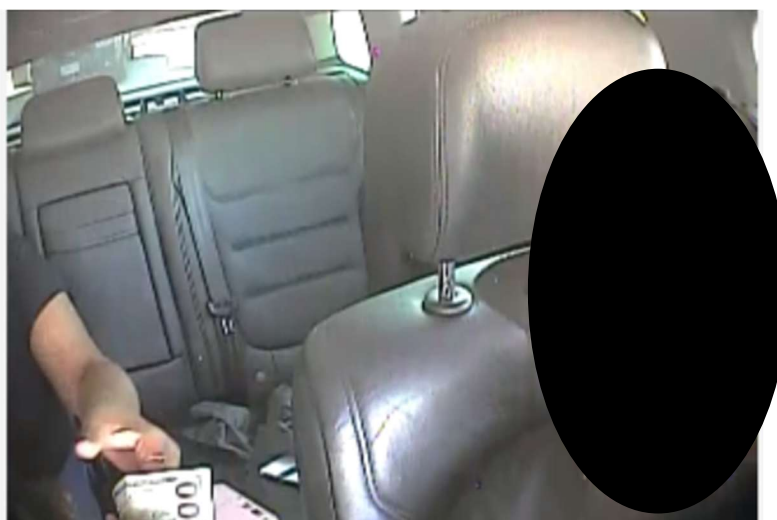


Image 5



Image 6



Image 7

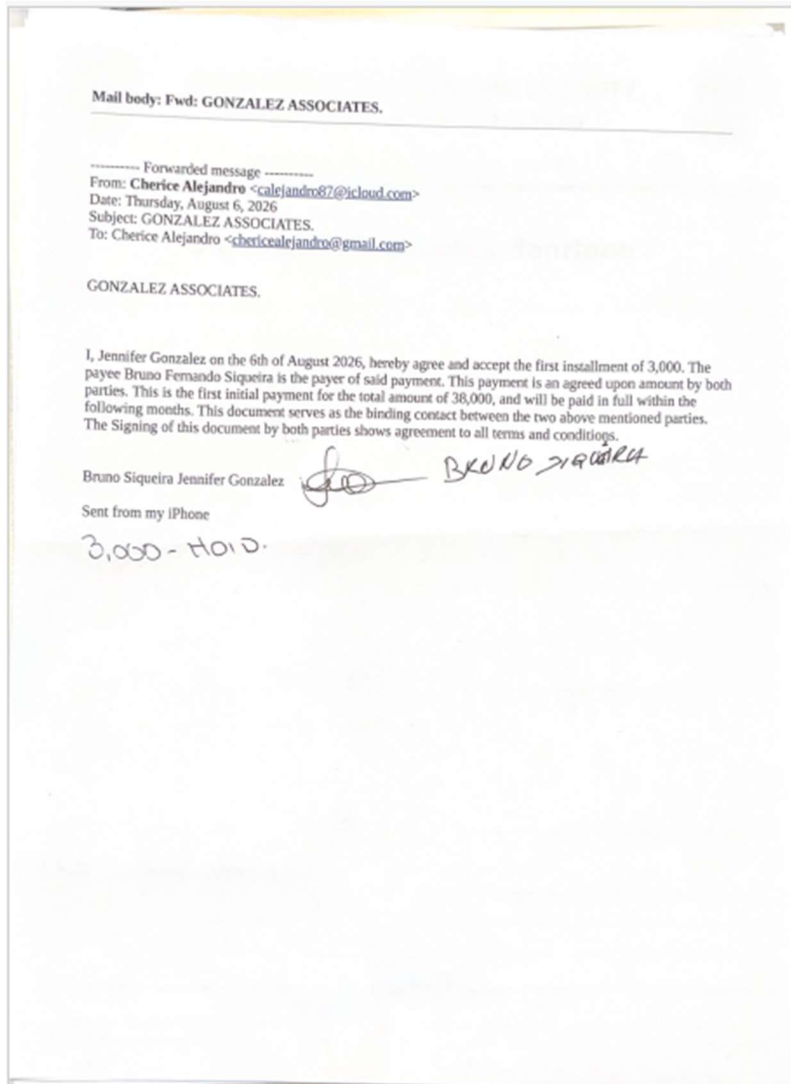


Image 8



Image 9

61. Below is a copy of the contract between GONZALEZ and CW-1 which was provided by CW-1 to investigators—the name used by CW-1 is a false name.

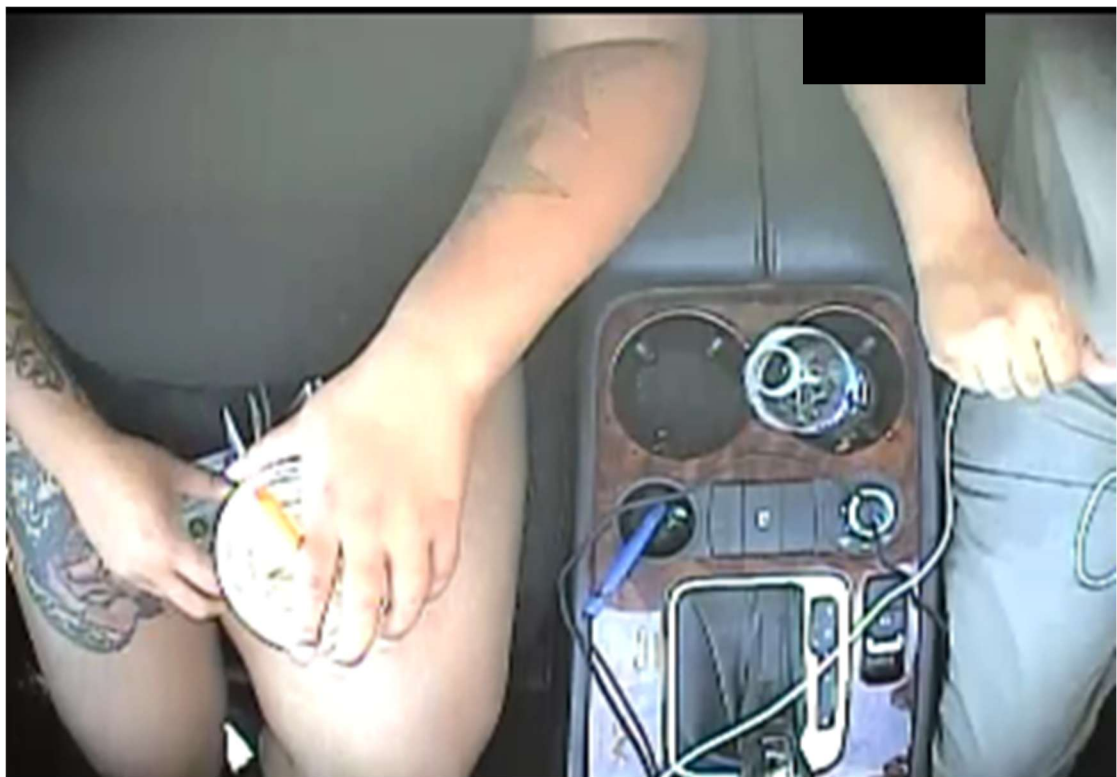
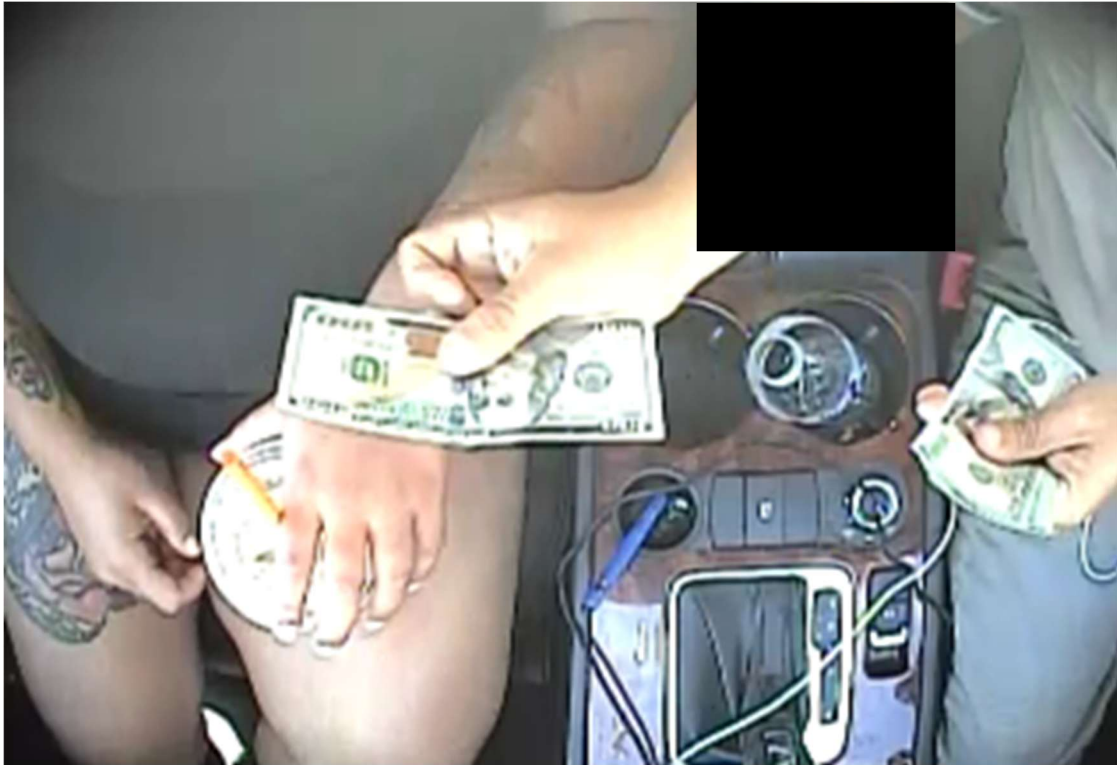


C. **CW-1's Meeting with ALEJANDRO and Payment of Money to Her for the Sham Marriage**

62. On or about September 3, 2026, CW-1 had a consensually recorded phone call with GONZALEZ about the fraudulent marriage with ALEJANDRO. GONZALEZ told CW-1 that ALEJANDRO wanted to get married in the next two weeks because she needed money to buy a new car. GONZALEZ told CW-1 that she would agree to a two-month period for the

wedding to take place. CW-1 agreed to make an installment payment. GONZALEZ asked if CW-1 could pay \$2,000 because that was the amount ALEJANDRO needed to pay for the new car. CW-1 told GONZALEZ that he could pay \$1,000. GONZALEZ said she would loan ALEJANDRO the other \$1,000 and then deduct that amount from ALEJANDRO's proceeds when the fraudulent marriage occurred. GONZALEZ and CW-1 agreed that CW-1 would meet with ALEJANDRO on September 4, 2026, in Revere, Massachusetts, to make the payment.

63. On September 4, 2026, at the direction of agents, CW-1 had a meeting, consensually recorded on audio/video, with ALEJANDRO and a second woman who identified herself as one of GONZALEZ's daughters at a Dunkin Donuts in Revere. The meeting was surveilled by investigators. ALEJANDRO got into the front seat of CW-1's car and GONZALEZ's daughter got into the backseat. CW-1 paid ALEJANDRO \$1,000 in United States currency, which was provided by the investigators. Included below are still images of CW-1 paying ALEJANDRO.



64. On September 5, 2026, CW-1 and GONZALEZ had a consensually recorded phone call. CW-1 confirmed that the installment money had been paid. GONZALEZ acknowledged that she had spoken to ALEJANDRO about receiving the money. GONZALEZ further stated: “I tell my people, as soon as they talk to you about money, you need to shut it down.” She added: “I handle the business part.” Based on my training and experience, I believe that GONZALEZ, as the leader of the operation, wants to maintain control over handling financial arrangements with clients.

III. DEFENDANT TAVARES’ PARTICIPATION IN THE CONSPIRACY

65. On or about May 1, 2018, ALEJANDRO married a Brazilian national, G.G., who had no legal right to be in the United States. ALEJANDRO was involved in multiple filings seeking to obtain United States immigration benefits for G.G. and to have G.G. legally admitted into the United States. Pursuant to these filings, ALEJANDRO claimed to be living with G.G. in Norwood, Massachusetts. In support of these filings, defendants GONZALEZ, TAVARES, and PUGH submitted three affidavits (each of which bore a copy of the respective woman’s identification and a notary stamp from the same notary public) attesting to the relationship between ALEJANDRO and G.G. In TAVARES’ affidavit, she attested:

I am writing to you in reference to my friend Cherice and her husband [redacted name]. I have never met a couple so fitting for each other. They fought so hard to be together it would be so unfortunate for them to ever be ripped apart. Cherice has been so happy since he has come into her life, she has had many misfortune and this love has built her up so high, I fear I’m not sure she recover from another blow losing [redacted name] will be her breaking point. The thought of losing him, I can see it in her face the possible effect it will have on her. [Redacted name] is a great man. He waits on her hand and foot and showers her with love and devotion. My friend needs her knight in shining armor.

66. Investigators have determined that, contrary to their claims, ALEJANDRO and G.G. were not living together. Instead, ALEJANDRO was living at GONZALEZ’s residence

with GONZALEZ and her husband E.D., who was identified as ALEJANDRO's brother. The separate living arrangements were confirmed not only through witness interviews but also through at least one USCIS investigator visit where ALEJANDRO was found living at the GONZALEZ residence in Fall River. TAVARES' affidavit was therefore a fraudulent document submitted in support of the ongoing GONZALEZ fraudulent marriages conspiracy. In this regard, DHS records show TAVARES traveling to the Dominican Republic with GONZALEZ on at least five occasions, and GONZALEZ is listed as the emergency contact on TAVARES' U.S. passport. Financial records obtained by investigators shows that, on March 12, 2025, TAVARES sent \$1,200 to a bank in the Dominican Republic to an account associated with GONZALEZ's sister.

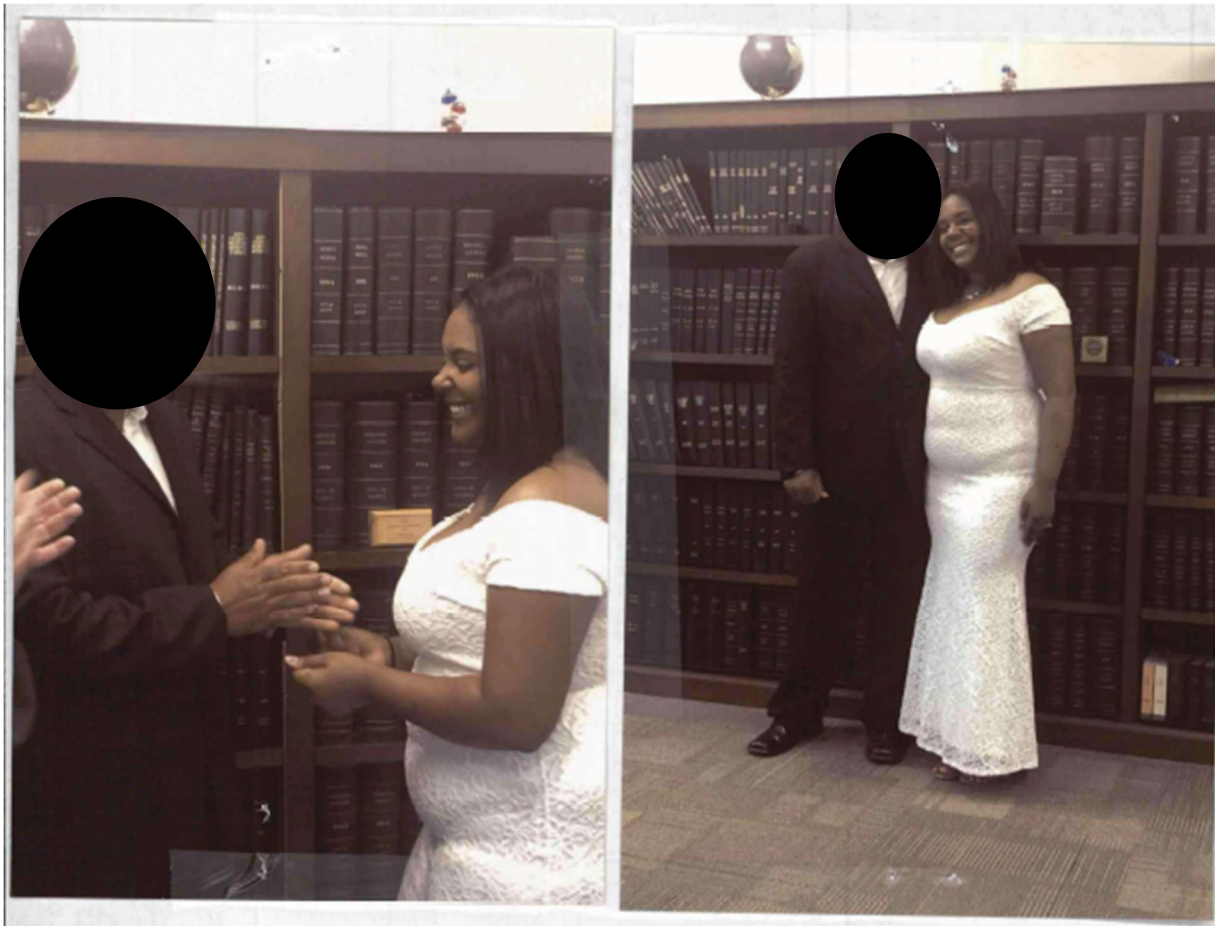
67. On or about May 25, 2018, based on public records, TAVARES married J.C. in Quincy, Massachusetts.⁶ They were divorced on August 22, 2022. DHS records show that, at the time of the marriage, J.C. was a Brazilian national with no legal authority to be in the United States. TAVARES made various filings to have J.C. admitted into the United States and to obtain immigration benefits for J.C. In these filings, TAVARES claimed that she was living with J.C. in Quincy. Multiple Fall River Police Department reports and other records demonstrate that TAVARES was not living with J.C. in Quincy and instead continued to reside in Fall River. For example, on October 17, 2018, Fall River police officers encountered TAVARES at an address associated with her based on a domestic disturbance complaint with her child's father (who was not J.C.). In a December 29, 2018, Fall River Police Department report the officer stated: "Based on my assignment to the housing unit, I am familiar with the female resident at 92 Sunset Hill [in Fall River], identified as Jessica Tavares. . . . She is the only adult

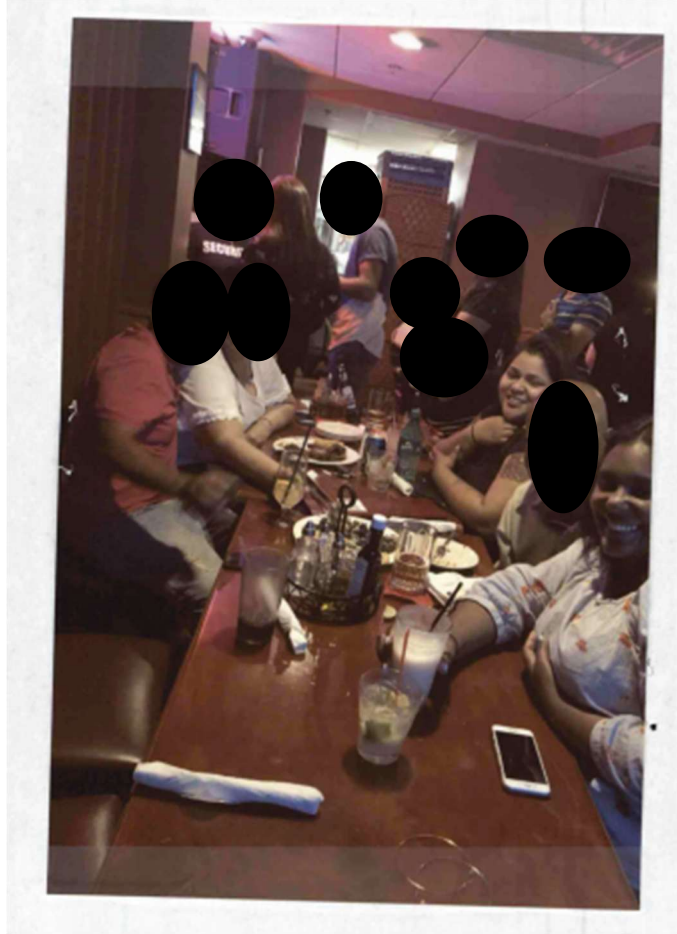
⁶ GONZALEZ admitted in her recorded communications with CW-1 that she had facilitated several sham marriages in Quincy, Massachusetts.

listed on her lease with the Fall River Housing Authority.”

68. TAVARES’ I-130 filed in support of her alleged marriage with J.C. included various photos of her and J.C. in an alleged social setting. They include photos of TAVARES and J.C. with ALEJANDRO and her “husband” G.G. (as noted above, this also was a fraudulent marriage) and photos with GONZALEZ. As discussed above, GONZALEZ told CW-2 during the August 6 Meeting that these types of fake “relationship” photos should be used in immigration filings to support the fraudulent marriage.

69. The first two images below, which TAVARES filed in her I-130 in support of immigration benefits for J.C., show the marriage between TAVARES and J.C. The second two images show GONZALEZ with TAVARES at the wedding and in an alleged social setting with J.C. The last image shows TAVARES with J.C. at a table in an alleged social setting. The couple sitting next to TAVARES and J.C. on the right side of the table are ALEJANDRO and G.G.





70. On May 4, 2020, TAVARES listed her address as 92 Sunset Hill, Fall River, in a public filing with the city of Fall River. On December 28, 2020, a Fall River Police Department report again listed her residence as Fall River and that her child was attending a school in Fall River. This evidence is contrary to TAVARES' claim that she was married to J.C. and living in Quincy.

71. Investigators determined that TAVARES applied to the MDTA to receive SNAP benefits. From May 2018 through August 2022, TAVARES filed several applications for SNAP benefits. During this period while seeking SNAP benefits, TAVARES did not list J.C. as being in her household and claimed to have never been married.

72. On or about March 2019, J.C. filed a I-601A petition seeking to overcome his unlawful presence in the United States while he sought a Permanent Resident card. As part of his application, J.C. confirmed that he intended to live in Quincy, not Fall River. TAVARES and J.C. divorced on April 18, 2022. In May 2026, J.C. filed an application with USCIS to become a naturalized United States citizen based on his alleged marriage to TAVARES. The application is pending.

73. On or about September 23, 2022, based on public records, TAVARES married D.L. in New Bedford, Massachusetts. *This marriage occurred approximately one month after TAVARES' divorce from J.C.* DHS record show that, at the time of the marriage, D.L. was a Brazilian national with no legal authority to be in the United States. On November 23, 2022, TAVARES filed a Form I-130 petition on behalf of D.L seeking to obtain United States immigration benefits for him. On October 29, 2024, a USCIS investigator interviewed TAVARES and D.L. The investigator identified that they provided contradictory answers regarding their marital history and day-to-day life. The investigator also noted that they claimed that they had been residing together since September 1, 2022, but records show that, on September 13, 2022, the Fall River Housing Authority began eviction proceedings against TAVARES to evict her from an apartment in a public housing development in Fall River. D.L. was not listed in any of the eviction documents. The August 23, 2023, Agreement for Judgment in the proceedings stated that: “[T]he defendant agrees she is the only adult occupant residing at the premises located at 92 Sunset Hill, Fall River, Massachusetts, 02724.”

74. Investigators determined that TAVARES applied to the MDTA to receive SNAP benefits during the period of the alleged marriage. From September 2022 through July 2026, TAVARES filed several applications for SNAP benefits. Investigators determined that, during

this period of seeking SNAP benefits, TAVARES did not list D.L. as being in her household and claimed to have never been married.

IV. DEFENDANT PUGH'S PARTICIPATION IN THE CONSPIRACY

76. As noted, GONZALEZ identified PUGH as her “secretary,” and PUGH was involved in producing the contract between GONZALEZ and CW-1 regarding his fraudulent marriage to ALEJANDRO. GONZALEZ also stated that PUGH had been responsible for generating prior contracts between GONZALEZ and her illegal alien clients.

77. As noted, PUGH also submitted an affidavit in support of immigration filings in ALEJANDRO's fraudulent marriage to G.G. PUGH wrote in the affidavit:

I would like to share that my friend Cherice Alejandro is madly in love with her husband, she needs him to push on. I have seen my friend struggle and cry, now it's nothing but smiles and joy they truly work as one. I would hate to see my friend lose out in life with a man that is truly and madly in love with her. I honestly don't know what she will do if she lost him. So I really need you to consider all parties and realize they need each other. Love truly conquers all so please help my friend.

Based on the investigation, ALEJANDRO was not living with her alleged husband, G.G., and the statements contained in PUGH's affidavit are about their relationship are blatantly false.

V. DEFENDANT HILL'S PARTICIPATION IN THE CONSPIRACY

78. Federal immigration records show that on September 16, 2018, M.S., a female Brazilian national, entered the United States as a B2 visa visitor. M.S. entered the United States with her husband, who was also a Brazilian national, and their son. Her period of authorized stay expired on or about March 5, 2019. M.S. did not depart the United States as required but rather stayed illegally within the United States. On August 4, 2023, M.S. and her husband filed for divorce in the Worcester County Probate Court. The divorce was finalized on January 10, 2024. On January 29, 2024, *nineteen days later*, M.S. married HILL. At the time M.S. married HILL, M.S. had no legal right to be in the United States.

79. On March 29, 2024, HILL filed a Form I-130 on behalf of M.S. to obtain immigration benefits in the United States. On November 2, 2024, the petition was denied when HILL failed to appear for an interview with federal immigration officials who were reviewing the petition.

80. A review of the housing information related to M.S. and HILL established that the I-130 petition had significant false statements in it and that the marriage between M.S. and HILL was a sham marriage for the purpose of illegally obtaining immigration benefits. For example, in the I-130, Hill and M.S. claimed that they were living together in Fall River. Public documents and police reports show that M.S. was living in Worcester, not Fall River.

81. Investigators also determined that the alleged joint bank account that M.S. and HILL claimed to have at Bank of America supported that their marriage was fraudulent. M.S. and HILL submitted alleged bank statements in support of the petition. The statements showed that nearly all withdrawal transactions, except for Zelle transactions, took place in Worcester, *not* Fall River, where they claimed to live, thus undercutting their claim of marriage. Moreover, investigators identified what appeared to be several altered sections of the bank records, which were altered to make the two appear to be living together. The altered sections had factual inconsistencies as well as font differences. For example, on March 6, 2024, there was claimed a \$9.44 charge at “Walmart #4387 Fall River”—Walmart Store #4387 is in Worcester, not Fall River, and the font for this transaction was different than other transactions. On March 8, 2024, there was a claimed charge at a Dollar Tree Store at 935 Grafton Street, Fall River. Investigators identified that there was no Grafton Street in Fall River. There is a Dollar Street Store at 935 Grafton Street in Worcester. The font for this transaction was different than other transactions. On March 25, 2024, there was an alleged charge for Al Anwar Market in Fall River. There is no

Al Anwar Market in Fall River. There is an Al Anwar Market in Worcester. Investigators determined, in addition, that Bank of America had no record of HILL having any account with the bank.

82. GONZALEZ's Capital One checking account shows that M.S. made payments to this account as follows: (1) M.S. sent GONZALEZ \$150 on July 23, 2023, and (2) M.S. sent GONZALEZ \$160 on August 12, 2023. These payments are consistent with GONZALEZ's marriage fraud operation. Moreover, on or about February 22, 2024, the Bank of America account discussed above (i.e., M.S.' account) had a transaction through Cash App showing \$500 being sent to a female herein identified as A.E. Fall River Police Department reports indicate that A.E. is the mother of HILL's children and were living together during the time that HILL claimed he was married to and living with M.S. In a recorded conversation, GONZALEZ told CW-1 that the GONZALEZ operation commonly had their clients make \$500 monthly payments to their "spouse" or someone close to the spouse (such as a relative or the mother of the spouse's child) as part of the fraudulent marriage scheme. In this regard, SOI-1 informed investigators that he made several payments to a male he believed was DANIELS cousin as part of their fraudulent marriage.

CONCLUSION

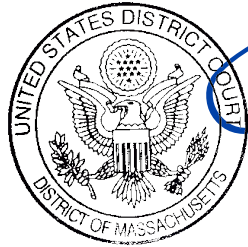
Based on the foregoing, there is probable cause to believe that Jennifer GONZALEZ, Erica DANIELS, Cherice ALEJANDRO, Amara PUGH, Jessica TAVARES, and Jayln HILL have violated federal law by the committing the crimes of: (1) Harboring Illegal Aliens, in violation of 8 U.S.C. § 1324(a)(1)(A)(iii); (2) Conspiracy to Harbor Illegal Aliens, in violation of 8 U.S.C. § 1324(a)(1)(A)(v)(I); and (3) Marriage Fraud, in violation of 8 U.S.C. § 1325(c).

Attested to under the pains and penalties of perjury by telephone in accordance with Fed.

R. Crim. P. 4.1 on October _____, 2025.

Special Agent
Christopher Womersley

Electronically sworn to and subscribed telephonically in accordance with Federal Rule of
Criminal Procedure 4.1 on October _____, 2025.





HONORABLE PAUL G. LEVENSON
CHIEF UNITED STATES MAGISTRATE JUDGE