

**CONTINUATION OF CRIMINAL COMPLAINT**

I, Brent J. Clark, being duly sworn, depose and state the following:

1. I am a Deportation Officer with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE). I am assigned to the Grand Rapids Sub-Office located on 517 Ottawa Ave. NW, Grand Rapids, MI. This is a sub-office within the Detroit Field Office. I have served with ICE Enforcement and Removal Operations (ERO) since August of 2007. Prior to that I served with U.S. Customs and Border Protection starting in December of 2003. I have successfully completed the Immigration Enforcement Agent Academy and Deportation Officer Transitional Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. My duties include the investigation and apprehension of foreign born nationals along with those who have been previously removed from the United States and who are present within the borders of the United States, in violation of Title 8 and Title 18 of the United States Code. During the course of my duties, I have participated in numerous criminal arrests and prosecutions.
2. This affidavit is submitted in support of the finding of probable cause and is, therefore, a summary of facts known to me.
3. On or about January 17, 2017, a person identified as **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** was arrested by the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) Subsequent checks of the subject's fingerprints through IAFIS, NCIC and other systems checks identified him as **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE**, Date of Birth XX/XX/1984, FBI#9XXXXXXWB5, MISID#22XXXXXP, A#XXXXXX7947. It should be noted that **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** was referred to ICE/ERO via an anonymous tip on December 29, 2016.
4. I conducted computerized Immigration record checks on **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** which revealed he is a citizen and national of Mexico and had been ordered deported on 11/9/2009 at Tucson, Arizona and was removed on 11/10/2009 to Mexico. **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** illegally reentered the United States on or about an unknown date and unknown place. **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** was also removed on or about 8/23/2016 at Laredo, Texas and 7/8/2016 at Hidalgo, Texas. In addition to his three formal removals, he was also allowed to voluntarily return to Mexico on February 10, 2009 through Laredo.
5. On January 17, 2017, ICE observed **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** leaving his residence and driving a Ford 150 Grey Truck bearing Michigan Plates DA12594. A traffic stop was conducted at the corner of Towner Avenue and Burton Street, Grand Rapids, MI. **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** was taken into custody and processed.

6. A computerized criminal history record search on **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** in the National Crime Information Center found along with a review of information contained in the alien file found that **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** was criminally prosecuted in the United States District Court, for the District of Arizona on November 10, 2009, for illegal entry in violation of 8 U.S.C. § 1325(a)(1), for which he was sentenced to 2 days' custody, and in the United States District Court, Southern District of Texas, Laredo Division on July 14, 2016, for illegal reentry in violation of 8 U.S.C. § 1325(a)(1), for which he was sentenced to 40 days' custody.
  
7. Based on my training and experience as a Deportation Officer for Immigration and Customs Enforcement (ICE) with the United States Department of Homeland Security (DHS), and the information contained in this affidavit, I believe that there exists probable cause to believe that **Jorge Abraham VARGAS-ALEGRE AKA: Jorge VARGAS-ALLEGRE** did reenter the U.S. after deportation, without the permission of the Attorney General or Secretary of Homeland Security in violation of 8 U.S.C. 1326(a).