

**FILED**

October 29, 2025

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: VJP  
Deputy

**DR:25-CR-02542-EG**

UNITED STATES OF AMERICA

§

Cause No.:

§

§

v.

§

**INDICTMENT**

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RAMON HERIBERTO CERDA, JR.,

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[Vio: COUNTS 1-4:18 U.S.C. § 1343 –  
Wire Fraud; COUNTS 5-8: Title 18  
U.S.C. § 1001(a)(2) - False Statement or  
Representation Made to an Agency or  
Department of the United States;  
COUNTS 9-11: 18 U.S.C. § 641 -  
Receiving Stolen Government Money or  
Property.]

THE GRAND JURY CHARGES:

**GENERAL ALLEGATIONS**

At all times relevant herein:

**A. PERSONS AND ENTITIES**

1. The United States Border Patrol maintains a station in Eagle Pass, Texas, which is located within the Western District of Texas, and is known as the Eagle Pass South Station.

2. DEFENDANT RAMON HERIBERTO CERDA, JR. (“CERDA”), is employed as a United States Border Patrol agent, assigned to the Eagle Pass South Station, and serves on the Transportation Detail.

3. CERDA owns a bank account with Bank of America, which has a branch in San Antonio, Texas, where CERDA receives his direct deposit payments from the United States Border Patrol for work performed.

4. CERDA's bi-weekly payments are wired to him from the National Finance Center, located in Indianapolis, Indiana, and are issued for his employment as a United States Border Patrol agent.

5. CERDA owns and operates a business known as El Eagle Mail, located in Eagle Pass, Texas, approximately a 15-to-20-minute drive from CERDA's residence

## **B. THE SCHEME**

6. From February 2025 through July 2025, CERDA was assigned to the Transportation Detail within the United States Border Patrol, where CERDA's shift is eight hours from 6:00 a.m. to 2:00 p.m., with the option to work an additional two hours each day for extra pay, totaling up to ten hours.

7. CERDA is required to be present in the field throughout the shift, positioned in an official government vehicle, and available to accept and perform transportation assignments as directed.

8. CERDA is required to complete and submit a biweekly timecard to his supervisors for approval, reflecting the hours worked during the preceding two-week period. CERDA is paid based on the hours submitted on the timecard.

9. From February 2025 through July 2025, CERDA submitted or brought about the submission of his biweekly timecard to his supervisors for approval, reflecting that he routinely worked ten-hour shifts. His regular eight-hour shift plus an additional two hours of overtime for extra pay.

10. CERDA was paid through direct deposit for the hours recorded on his timecard, with payments originating from the National Finance Center in Indianapolis, Indiana. The payments were wired across multiple states to his bank account in San Antonio, Texas.

11. During the hours reflected on CERDA's timecard that he represented as time worked, CERDA was in fact either at his residence or at his other business, El Eagle Mail.

12. On March 31, 2025, CERDA received a wire transfer for \$3,181.53 from the National Finance Center as payment for the hours reflected on his timecard as time worked as a Border Patrol agent.

13. On June 9, 2025, CERDA received a wire transfer for \$2,983.61 from the National Finance Center as payment for the hours reflected on his timecard as time worked as a Border Patrol agent.

14. On June 23, 2025, CERDA received a wire transfer for \$2,939.16 from the National Finance Center as payment for the hours reflected on his timecard as time worked as a Border Patrol agent.

15. On July 7, 2025, CERDA received a wire transfer for \$3,383.65 from the National Finance Center as payment for the hours reflected on his timecard as time worked as a Border Patrol agent.

COUNTS ONE THROUGH FOUR  
(Wire Fraud)  
[18 U.S.C. § 1343]

**THE SCHEME TO DEFRAUD**

16. Count One through Four incorporates paragraphs 1-14 above by reference as though fully alleged and restated herein.

17. From on or about February 11, 2025, to on or about July 7, 2025, Defendant RAMON HERIBERTO CERDA, JR., devised and intended to devise a scheme to defraud the United States Border Patrol agency, and to obtain money by means of materially false and fraudulent pretenses, representations and promises.

**EXECUTION OF THE SCHEME**

18. On or about the following dates, in the Western District of Texas, Defendant,

**RAMON HERIBERTO CERDA, JR.,**

having devised and intended to devise the aforesaid scheme, for the purpose of executing said scheme, and attempting to do so, did knowingly transmit and cause to be transmitted in interstate commerce by means of a wire communication, certain signs, signals and sounds to and from the Western District of Texas, as described below:

| COUNT | DATE           | ORIGINATING TRANSACTION                                                                                                 | DESTINATION                                                                           |
|-------|----------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| 1     | March 31, 2025 | Wire for \$3,181.53 from the United States Department of Agriculture transaction identification number xxxxxxxxxxxx4000 | Bank of America Account in the name of Ramon Cerda with account number xxxx xxxx 7345 |

|   |               |                                                                                                                         |                                                                                       |
|---|---------------|-------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| 2 | June 9, 2025  | Wire for \$2,983.61 from the United States Department of Agriculture transaction identification number xxxxxxxxxxxx4000 | Bank of America Account in the name of Ramon Cerda with account number xxxx xxxx 7345 |
| 3 | June 23, 2025 | Wire for \$2,939.16 from the United States Department of Agriculture transaction identification number xxxxxxxxxxxx4000 | Bank of America Account in the name of Ramon Cerda with account number xxxx xxxx 7345 |
| 4 | July 7, 2025  | Wire for \$3,383.65 from the United States Department of Agriculture transaction identification number xxxxxxxxxxxx4000 | Bank of America Account in the name of Ramon Cerda with account number xxxx xxxx 7345 |

All in violation of Title 18, United States Code, Section 1343.

**COUNTS FIVE THROUGH EIGHT**

**(False Statement or Representation Made to an Agency or Department of the United States)**

**[18 U.S.C. § 1001(a)(2)]**

19. On or about the following dates, in the Western District of Texas,

Defendant,

**RAMON HERIBERTO CERDA, JR.,**

did knowingly and willfully make, and cause to be made, materially false, fictitious, and fraudulent statements and representations to a United States Border Patrol agency, in a matter within the jurisdiction of an executive department and agency of the United States, that is, Defendant submitted or brought about the submission of Defendant's timecards representing that he had worked one hundred (100) hours or more during the relevant pay period, and such statements and representations were false because, as Defendant then and there knew, Defendant did not work one hundred (100) hours or more during the relevant pay period, as described below:

| COUNT | DATE           | DOCUMENT                              |
|-------|----------------|---------------------------------------|
| 5     | March 22, 2025 | A timecard for pay period five (5)    |
| 6     | May 31, 2025   | A timecard for pay period ten (10)    |
| 7     | June 14, 2025  | A timecard for pay period eleven (11) |
| 8     | June 28, 2025  | A timecard for pay period twelve (12) |

All in violation of Title 18, United States Code, Section 1001(a)(2).

**COUNTS NINE THROUGH ELEVEN**  
**(Receiving Stolen Government Money or Property)**  
**[18 U.S.C. § 641]**

20. Count Nine through Eleven incorporates paragraphs 1-16 above by reference as though fully alleged and restated herein.

21. Between on or about (first date) and on or about (end dates), in the Western District of Texas, Defendant,

**RAMON HERIBERTO CERDA, JR.,**

willfully and knowingly did receive, conceal and retain stolen property of the United States, that is, money, of a value exceeding \$1000.00, with intent to convert said property to his own use, Defendant then knowing said property to have been stolen, in violation of 18 U.S.C. § 641 to wit:

| COUNT | DATE          | AMOUNT               | SOURCE                                                                  |
|-------|---------------|----------------------|-------------------------------------------------------------------------|
| 9     | June 9, 2025  | in excess of \$1,000 | National Finance Center -<br>United States Department of<br>Agriculture |
| 10    | June 23, 2025 | in excess of \$1,000 | National Finance Center -<br>United States Department of<br>Agriculture |
| 11    | July 7, 2025  | in excess of \$1,000 | National Finance Center -<br>United States Department of<br>Agriculture |

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
**[See Fed. R. Crim. P. 32.2.]**

**I.**

**Theft of Government Funds and Wire Fraud Violations and Forfeiture Statutes**  
**[Title 18 U.S.C. §§ 641 and 1343, subject to forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the foregoing criminal violations set forth above, the United States gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 981(a)(1)(C), made applicable by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 981. Civil Forfeiture**

**(a)(1)** The following property is subject to forfeiture to the United States:

\* \* \*

**(C)** Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting "specified unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Theft of Government Funds and Wire Fraud are offenses constituting "specified unlawful activity" as defined in section 1956(c)(7) of this title.

**Title 28 U.S.C. § 2461.**

(c) If a person is charged in a criminal case with a violation of an Act of Congress for which the civil or criminal forfeiture of property is authorized, the Government may include notice of the forfeiture in the indictment or information pursuant to the Federal Rules of Criminal Procedure...

**IV.**  
**Money Judgment**

**Money Judgment:** A sum of money equal to the value of any property constituting, or derived from, any proceeds traceable to the above violations for which the Defendant is liable.

**V.**  
**Substitute Assets**

If any of the property described above as being subject to forfeiture for the violations set forth above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States of America to seek forfeiture of any other property of the Defendant, up to the value of the money judgment, as substitute property pursuant to Title 21 U.S.C. § 853(p) and Fed. R. Crim. P. 32.2(e)(1).

A TRUE BILL.

FOREPERSON

JUSTIN R. SIMMONS  
United States Attorney

By: Wagner Gady for

JOSEPH DUARTE II  
Assistant United States Attorney