IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	
v.	No. 4:26-MJ-
FRANCISCO FEDERICO REYES-BRAVO (01)	

CRIMINAL COMPLAINT

Alleged Offense:

I, Steven M. Kearns, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

> On or about October 28, 2026, in the Fort Worth Division of the Northern District of Texas, defendant **Francisco Reyes-Bravo**, falsely and willfully represented himself to be a citizen of the United States in violation of 18 U.S.C. § 911.

Probable Cause:

1. Affiant is employed as a Customs and Border Protection Enforcement Officer with the Department of Homeland Security and has been employed in this capacity for approximately 17 years. I was previously employed as a Customs and Border Protection Officer with this agency and as an Immigration Inspector with the predecessor agency, the former Immigration and Naturalization Service, for approximately 10 years. My responsibilities include enforcing the provisions of the Immigration and Nationality Act, processing inadmissible aliens that are encountered, and coordinating the prosecution of criminal aliens encountered or entering the United States.

2. The information contained in this affidavit is based on my personal knowledge, observations, and interviews conducted during the course of this investigation,

information conveyed to me by other agents and law enforcement officers, and my review of the records, documents, and other physical evidence.

3. On or about October 28, 2026, Francisco Federico REYES BRAVO, a citizen of Mexico, arrived in the Northern District of Texas at Dallas Fort Worth International Airport, Texas, port of entry, aboard American Airlines flight number 4245 from Veracruz, Mexico.

4. Mr. REYES BRAVO presented to the primary CBP Officer, United States passport number 586876243, bearing his photograph under the name Javier Torres Rodriguez, date of birth September 23, 1978, and place of birth was Puerto Rico, he applied for admission to enter the United States as a United States citizen. Mr. REYES BRAVO was determined to be a potential match with a National Crime Information Center (NCIC) warrant, the primary CBP officer referred the defendant to passport control secondary.

5. During the Passport Control Secondary inspection, system queries confirmed an active NCIC warrant issued by the Riverside County (CA) Sheriff's Department for Sell/Furnish Marijuana or Hashish. MR. REYES BRAVO verbally confirmed the biographical information associated with the NCIC record. Subsequent search of his fingerprints in an IDENT biometric query revealed information of the identity BRAVO, Francisco Federico matching fingerprint identification number 1405537863.

6. Mr. REYES BRAVO maintained he was of Puerto Rican descent and had applied for a U.S. passport. However, when unable to answer basic questions to substantiate his claim, an examination of his cellphone was conducted which led to the discovery that his

mother had a Mexican phone number. Miranda Rights were read to Mr. REYES BRAVO. When confronted by all the evidence and the fingerprint results, Mr. REYES BRAVO admitted that he was born in Ensenada, Baja California, Mexico.

7. A search of the travel records maintained by Customs and Border Protection revealed United States passport number 586876243 under the name Javier Torres Rodriguez was used to gain entry into the United States by air through George Bush Intercontinental Airport, Houston, Texas, Dallas Fort Worth International Airport, Dallas, Texas, and Charlotte Douglas International Airport, Charlotte, North Carolina, for a total of 10 times. Mr. REYES BRAVO further used United States passport number 586876243 to enter the United States along the Northern and Southern land ports of entry for a total of 42 times. All of the entries occurred between October 10, 2018, and October 28, 2026.

8. Mr. REYES BRAVO was processed on October 28, 2026, at the Dallas Fort Worth Airport, Texas for administrative removal for immigration violations as a false claim to United States citizenship, fraud and misrepresentation, and for being an intended immigrant.

9. Francisco Federico REYES BRAVO, purported to be Javier Torres Rodriguez, executed DS-11 Application number 340859794 for a U.S. passport number 586876243 at the U.S Post Office in Piedmont, South Carolina. To establish his identity, he submitted a South Carolina Driver License number 104098148 in the identity of be Javier Torres Rodriguez. To establish his US citizenship, Mr. REYES BRAVO, purported to be Torres Rodriguez, submitted a Puerto Rico Certificate of Birth, filed September 17, 2013,

originally filed September 25, 2013, in the identity of Javier Torres Rodriguez born September 29, 1978, in Puerto Rico.

10. On September 4, 2018, Mr. REYES BRAVO purported to be Torres Rodriguez, under the penalty of perjury, swore to the U. S. Passport Acceptance Clerk at Piedmont, South Carolina U.S. Post Office in Piedmont, South Carolina that all the information contained on the DS-11 Application for U.S. Passport number 586876243 was true and correct. Mr. REYES BRAVO used a false name, date of birth, and place of birth to secure the issuance of U.S. Passport number 586876243.

11. Based upon the forgoing, the affiant believes there is probable cause to believe Francisco Federico REYES BRAVO, a citizen of Mexico, also known as Javier Torres Rodriguez, falsely and willfully representing himself to be a citizen of the United States in violation of 18 U.S.C. § 911.

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Steven Kearns, Enforcement Officer, CBP
Department of Homeland Security
Dallas Fort Worth International Airport, Texas

Sworn to me at _____ a.m./p.m. in Fort Worth, Texas, on this _____ day of _____, 2026.

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JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE