

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO:</b> _____
v.	:	<b>DATE FILED:</b> _____
<b>MIGUEL MORALES</b>	:	<b>VIOLATIONS:</b>
a/k/a "Miguel Morales-Lopez"	:	<b>18 U.S.C. § 371 (conspiracy – 1</b>
<b>OSCAR CARRILLO-PEREZ</b>	:	<b>count)</b>
a/k/a "Oscar Carillo-Perez"	:	<b>8 U.S.C. § 1324(a)(1)(A)(ii)</b>
a/k/a "Oscar Morales"	:	<b>(transporting undocumented aliens –</b>
<b>SANTIAGO GARCIA-RAMIREZ</b>	:	<b>15 counts)</b>
a/k/a "Santiago Garcia"	:	<b>18 U.S.C. § 1001(a)(3) (false</b>
<b>JOSE LUIS MORALES,</b>	:	<b>statements – 4 counts)</b>
a/k/a "Conejo"	:	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

**The Defendants and Morales Contractor**

1. Defendant MIGUEL MORALES ("MORALES"), a/k/a "Miguel Morales-Lopez," operated Morales Contractor, a/k/a Morales Contractor Inc., a/k/a Morales Contractor LLC ("Morales Contractor"). Morales Contractor was a labor leasing company that provided temporary workers, primarily to mushroom farms in Chester County, Pennsylvania. Defendant MORALES was the sole owner of Morales Contractor.

2. Morales Contractor employed hundreds of workers. The farms paid Morales Contractor for the work performed, plus a commission, and then Morales Contractor paid the farm workers.

3. Defendant MIGUEL MORALES owned approximately 11 houses in Chester and Lancaster Counties, Pennsylvania. Defendant MORALES provided many of his workers with housing, either in houses that he owned, or in apartments or houses that he rented. Defendant MORALES's workers paid him rent for this housing.

4. Defendant MIGUEL MORALES owned numerous vehicles, many of which were vans. Defendant MORALES provided some of his workers with transportation to and from the farms where they worked. Defendant MORALES's workers paid him weekly for this transportation.

5. Defendant MIGUEL MORALES operated a large convenience store by the name of La Latina International Market in Oxford, Pennsylvania. Defendant MORALES's workers could cash their pay checks at La Latina International Market.

6. Defendant MIGUEL MORALES operated Morales Auto Sales in New Providence, Pennsylvania.

7. Defendant OSCAR CARRILLO-PEREZ, a/k/a "Oscar Carillo-Perez," a/k/a "Oscar Morales," was an employee of Morales Contractor.

8. Defendant SANTIAGO GARCIA-RAMIREZ, a/k/a "Santiago Garcia," was an employee of Morales Contractor.

9. Defendant JOSE MORALES, a/k/a "Conejo," was an employee of Morales Contractor.

**Immigration Laws and Regulations**

10. Generally, a citizen of a foreign country who wishes to enter the United States to work in the United States must first obtain a visa, either a non-immigrant visa for temporary stay, or an immigrant visa for permanent residence. Under United States laws and regulations, non-citizens of the United States (“aliens”) are not permitted to work in the United States unless they obtain employment authorization from the United States government.

11. Many of defendant MIGUEL MORALES’s employees were citizens of foreign countries who were not lawfully present in the United States because they did not have a visa or other government authorization to enter or remain in the United States (i.e., they were “undocumented aliens”), and therefore they could not legally work in the United States.

12. From at least as early as 2018, and continuing to the date of this indictment, in Quarryville, in the Eastern District of Pennsylvania and elsewhere, defendants

**MIGUEL MORALES,  
a/k/a “Miguel Morales-Lopez,”  
OSCAR CARRILLO-PEREZ,  
a/k/a “Oscar Carillo-Perez,”  
a/k/a “Oscar Morales,”  
SANTIAGO GARCIA-RAMIREZ,  
a/k/a “Santiago Garcia,” and  
JOSE MORALES,  
a/k/a “Conejo,”**

conspired and agreed with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly, and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of the law, transport and move, and attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of

commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A).

**MANNER AND MEANS**

13. Defendant MIGUEL MORALES did not ask prospective employees if they were in the United States legally or illegally; rather, he hired employees regardless of their immigration status or whether they were legally permitted to work in the United States.

14. Defendant MIGUEL MORALES hired undocumented aliens who were not lawfully present in the United States, and who therefore were not eligible to work in the United States.

15. Defendant MIGUEL MORALES did not file Form W-2 Wage and Tax Statements for his employees.

16. Defendant MIGUEL MORALES did not collect and pay over to the IRS any employment taxes (FICA taxes and federal income tax withholding) for Morales Contractor employees.

17. Defendant OSCAR CARRILLO-PEREZ drove a vehicle registered to defendant MIGUEL MORALES to transport undocumented aliens between their residences and the farms where they worked for Morales Contractor.

18. Defendant OSCAR CARRILLO-PEREZ purchased plane tickets for undocumented aliens to travel to locations where he or defendant MIGUEL MORALES would pick them up.



19. Defendant OSCAR CARRILLO-PEREZ also drove vehicles registered to defendant MIGUEL MORALES to other states, and brought undocumented aliens from those states to Chester County, Pennsylvania, to work for Morales Contractor.

20. Defendant SANTIAGO GARCIA-RAMIREZ drove a vehicle registered to defendant MIGUEL MORALES to transport undocumented aliens between their residences and the farms where they worked for Morales Contractor.

21. Defendant JOSE MORALES drove a vehicle registered to defendant MIGUEL MORALES to transport undocumented aliens between their residences and the farms where they worked for Morales Contractor.

22. Defendants MIGUEL MORALES, OSCAR CARRILLO-PEREZ, SANTIAGO GARCIA-RAMIREZ, and JOSE MORALES handed out Morales Contractor paychecks to employees of Morales Contractor.

23. Defendants OSCAR CARRILLO-PEREZ, SANTIAGO GARCIA-RAMIREZ, and JOSE MORALES drove employees of Morales Contractor to La Latina International Market where they could cash their paychecks and wire money to foreign countries.

#### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants MIGUEL MORALES, OSCAR CARRILLO-PEREZ, SANTIAGO GARCIA-RAMIREZ, and JOSE MORALES committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 7, 2018, defendant MIGUEL MORALES caused A.P.P., a person known to the grand jury, to drive a van registered to defendant MORALES with

approximately eight passengers, all or almost all of whom were aliens who were unlawfully present in the United States, and who worked for Morales Contractor. A.P.P. drove the undocumented aliens to work picking mushrooms for Morales Contractor.

2. On or about January 3, 2019, defendant MIGUEL MORALES told H.H., a person known to the grand jury, that defendant MORALES would send someone named “Santiago” to drive H.H. from Maryland to Chester County, so that H.H. could work for Morales Contractor at the mushroom farms.

3. On or about January 3, 2019, defendant MIGUEL MORALES caused defendant SANTIAGO GARCIA-RAMIREZ to drive to Maryland to bring H.H. to Pennsylvania to work for Morales Contractor.

4. On or about January 7, 2019, defendant SANTIAGO GARCIA-RAMIREZ drove H.H., an employee of Morales Contractor whom he believed to be an undocumented alien, to work at a mushroom farm.

5. On or about March 22, 2019, defendant MIGUEL MORALES drove to Baltimore-Washington International (“BWI”) Airport in a Chevrolet van registered to Morales Auto Sales. At BWI Airport, defendant MORALES picked up three males from Guatemala who were unlawfully present in the United States and brought them to Chester County, Pennsylvania.

6. On or about March 29, 2019, defendant OSCAR CARILLO-PEREZ drove to Alabama in a Yukon Denali, bearing License Plate K17586K, registered to Morales Auto Sales.

7. On or about March 30, 2019, defendant OSCAR CARRILLO-PEREZ

drove the Yukon Denali bearing License Plate K17586K from Alabama to Chester County, bringing with him approximately six men who spoke a Guatemalan dialect and were unlawfully present in the United States.

8. On or about May 3, 2019, defendant OSCAR CARRILLO-PEREZ drove to Alabama in the Yukon Denali, bearing License Plate K17586K.

9. On or about May 19, 2019, defendant OSCAR CARRILLO-PEREZ drove to Alabama in a Toyota RAV 4, bearing License Plate K17586K, the same License Plate that was previously affixed to the Yukon Denali on the prior trips to Alabama, to pick up and transport men back to Pennsylvania.

10. On or about February 11, 2021, defendant OSCAR CARRILLO-PEREZ drove a van, registered to defendant MIGUEL MORALES, with multiple passengers whom he drove to or from a mushroom farm daily, all or almost all of whom were undocumented aliens who worked for Morales Contractor.

11. On or about February 11, 2021, defendant SANTIAGO GARCIA-RAMIREZ drove a van, registered to Morales Contractor, from a mushroom farm with multiple passengers, all or almost all of whom were undocumented aliens.

12. On or about March 8, 2021, defendant JOSE MORALES drove a van, registered to defendant MIGUEL MORALES, with one passenger, an undocumented alien, whom he was transporting to work at a mushroom farm.

All in violation of Title 18, United States Code, Section 371.

**COUNTS TWO THROUGH FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1 through 11 and 13 through 23 of Count One are re-alleged here.
2. On or about March 22, 2019, in the Eastern District of Pennsylvania and elsewhere, defendants

**MIGUEL MORALES,  
a/k/a “Miguel Morales-Lopez,” and  
OSCAR CARRILLO-PEREZ,  
a/k/a “Oscar Carillo-Perez,”  
a/k/a “Oscar Morales,”**

knowingly and in reckless disregard of the fact that the aliens identified below came to, entered, and remained in the United States in violation of law, transported and moved these aliens, and aided and abetted their transportation and movement, within the United States, for the purpose of commercial advantage and private financial gain, each individual alien constituting a separate count of this indictment:

2	J.P.T.
3	L.P.A.Q.
4	H.D.P.Q.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(A)(v)(II).



**COUNTS FIVE THROUGH SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1 through 11 and 13 through 23 of Count One are re-alleged here.
2. On or about February 11, 2021, in the Eastern District of Pennsylvania and elsewhere, defendants

**MIGUEL MORALES,  
a/k/a “Miguel Morales-Lopez,” and  
OSCAR CARRILLO-PEREZ,  
a/k/a “Oscar Carillo-Perez,”  
a/k/a “Oscar Morales,”**

knowingly and in reckless disregard of the fact that the aliens identified below came to, entered, and remained in the United States in violation of law, transported and moved these aliens, and aided and abetted their transportation and movement, within the United States, for the purpose of commercial advantage and private financial gain, each individual alien constituting a separate count of this indictment:

5	M.R.
6	D.B.
7	S.S.R.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(A)(v)(II).

**COUNTS EIGHT THROUGH FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1 through 11 and 13 through 23 of Count One are re-alleged here.
2. On or about February 11, 2021, in the Eastern District of Pennsylvania and elsewhere, defendants

**MIGUEL MORALES,  
a/k/a “Miguel Morales-Lopez,” and  
SANTIAGO GARCIA-RAMIREZ  
a/k/a “Santiago Garcia,”**

knowingly and in reckless disregard of the fact that the aliens identified below came to, entered, and remained in the United States in violation of law, transported and moved these aliens, and aided and abetted their transportation and movement, within the United States, for the purpose of commercial advantage and private financial gain, each individual alien constituting a separate count of this indictment:

8	Z.P.G.
9	R.L.G.
10	R.P.M.
11	J.P.M.
12	F.P.S.
13	M.Q.C.
14	M.O.C.C.
15	V.H.M.S.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(A)(v)(II).

**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1 through 11 and 13 through 23 of Count One are re-alleged here.
2. On or about March 8, 2021, in the Eastern District of Pennsylvania and elsewhere, defendants

**MIGUEL MORALES,  
a/k/a “Miguel Morales-Lopez,” and  
JOSE MORALES,  
a/k/a “Conejo,”**

knowingly and in reckless disregard of the fact that H.T.C. came to, entered, and remained in the United States in violation of law, transported and moved H.T.C., and aided and abetted her transportation and movement, within the United States, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(A)(v)(II).

**COUNTS SEVENTEEN THROUGH TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates below, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MIGUEL MORALES,  
a/k/a “Miguel Morales-Lopez,”**

in a matter within the jurisdiction of the United States Department of Labor, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant MORALES falsely checked “No” on his Application for a Farm Labor Contractor Certificate of Registration [under the] Migrant and Seasonal Agricultural Worker Protection Act, in response to the question,, “Will you be directly transporting workers or engaging others to provide transportation?” when, as the defendant then knew, he transported workers and engaged others to provide transportation. with each false Application constituting a separate count:

Count	Date of Application
17	12/19/2017
18	1/2/2019
19	12/18/2019
20	12/29/2020



All in violation of Title 18, United States Code, Section 1001(a)(3).

**A TRUE BILL:**

  
\_\_\_\_\_  
**GRAND JURY FOREPERSON**

*Ronald Savach for*  
\_\_\_\_\_  
**JENNIFER ARBITTIER WILLIAMS  
ACTING UNITED STATES ATTORNEY**

No. \_\_\_\_\_

**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

v.

**MIGUEL MORALES**  
a/k/a "Miguel Morales-Lopez"  
**OSCAR CARRILLO-PEREZ**  
a/k/a "Oscar Carillo-Perez"  
a/k/a "Oscar Morales"  
**SANTIAGO GARCIA-RAMIREZ**  
a/k/a "Santiago Garcia"  
**JOSE LUIS MORALES,**  
a/k/a "Conejo"

INDICTMENT

Counts

**18 U.S.C. § 371 (conspiracy – 1 count)**  
**8 U.S.C. § 1324(a)(1)(A)(ii) (transporting undocumented aliens – 15 counts)**  
**18 U.S.C. § 1001(a)(3) (false statements – 4 counts)**



Filed in open court this \_\_\_\_\_ day,  
Of \_\_\_\_\_ A.D. 20\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: Quarryville, Pennsylvania

County: Lancaster

Register number: N/A

Place of accident, incident, or transaction:

Eastern District of Pennsylvania

Post Office: Oxford

County: Chester

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: **US v. Miguel Morales and Lawrence Urena**  
**(additional indictment to be filed today)**

Case Number: 21cr126

Judge: SAVAGE

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

1.  Antitrust
2.  Income Tax and other Tax Prosecutions
3.  Commercial Mail Fraud
4.  Controlled Substances
5.  Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
6.  General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

18 U.S.C. § 371 (conspiracy – 1 count); 8 U.S.C. § 1324(a)(1)(A)(ii) (transporting undocumented aliens – 15 counts); 18 U.S.C. § 1001(a)(3) (false statements – 4 counts)

DATE: April 1, 2021

s/ Karen L. Grigsby

Karen L. Grigsby

Assistant United States Attorney

File No. 2018R00671

U.S. v. Miguel Morales, a/k/a Miguel Morales-Lopez, et al. (additional defendants on next page)

**Oscar Carrillo-Perez, a/k/a Oscar Carillo-Perez, a/k/a Oscar Morales**

West Grove, PA 19390

Register No. N/A

**Santiago Garcia-Ramirez, a/k/a Santiago Garcia**

Landenburg, PA 19350

Register No. N/A

**Jose Luis Morales, a/k/a “Conejo”**

Quarryville, PA 17566

Register No. N/A