

United States Courts  
Southern District of Texas

AO 91 (Rev. 11/11) Criminal Complaint

FILED

## UNITED STATES DISTRICT COURT

July 23, 2024

for the

Nathan Ochsner, Clerk of Court

Southern District of Texas

United States of America

v.

Aurelio QUINTANILLA JR

Case No. **4:24-mj-327***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 July 22, 2024 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S. Code § 2251

"Sexual exploitation of children"

18 U.S. Code § 2252A(5)(B)

"Certain activities relating to child pornography"

This criminal complaint is based on these facts:

See Attached Affidavit.

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

Lydia Lane, Special Agent, HSI

*Printed name and title*

Sworn to before me and signed by telephone.

Date: 07/23/2024*Judge's signature*City and state: Houston, TX

United States Magistrate Judge Christina A Bryan

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN THE MATTER OF:

Aurelio QUINTANILLA JR

Case No. 4:24-mj-327

AFFADAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Lydia Lane, being duly sworn, depose and state:

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), assigned to the Office of the Special Agent in Charge, Houston, Texas. I have been employed by Immigration & Customs Enforcement (ICE), Homeland Security Investigations (HSI), as an HSI agent since July 2022. I am currently assigned to the Child Exploitation Group, and as part of my daily duties as an HSI agent assigned to this group, I investigate criminal violations relating to child exploitation and child pornography including violations of Chapter 109A, Chapter 110 and Chapter 117, all contained within Title 18 of the United States Code. I have received training in the area of child pornography and child exploitation. I have also participated in the execution of search warrants and arrest warrants; a number of which involved child exploitation and child pornography offenses.

2. This affidavit is based on reports your affiant has read and conversations your affiant has had with law enforcement officers and investigators involved in this investigation. This affidavit does not set forth all of my knowledge in this matter but is intended only to show that there is probable cause to believe that Aurelio QUINTANILLA JR is in violation of **Title 18 USC 2252A(5)(B)**, anyone who knowingly possesses, or knowingly accesses with intent to view, any book, magazine, periodical, film, videotape, computer disk, or any other material that contains an image of child pornography that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed, or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, and **Title 18 USC 2251** anyone who employs, uses, induces,

entices, or coerces, a minor to engage in any sexually explicit conduct with the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped or transported in or affecting interstate or foreign commerce.

3. On July 22, 2024, HSI Special Agent Jose Zapata (“SA Zapata”) received a request for assistance from Customs and Border Protection Officers (CBPOs) at George Bush Intercontinental Airport, Houston, Texas (“IAH”) regarding an arriving passenger named Aurelio QUINTANILLA JR.

4. On July 22, 2024, United States Citizen QUINTANILLA JR entered the United States at IAH on a flight originating from Mexico. CBPOs referred QUINTANILLA JR to a secondary inspection. During the secondary inspection, CBPOs viewed what they suspected to be child pornography during a border search of QUINTANILLA JR’s iPhone 14 Pro Max.

5. The CBPOs, as part of their secondary inspection, questioned QUINTANILLA JR about his recent travels abroad. QUINTANILLA JR claimed he was on vacation in Cancun, Mexico with approximately 40 family members.

6. SA Lydia Lane and SA Ricardo Garza responded to IAH and met with CBPOs who briefed the special agents concerning QUINTANILLA JR’s travel and the suspected child pornography on QUINTANILLA JR’s iPhone 14 Pro Max.

7. SA Lane and SA Garza observed multiple images and videos of child pornography on QUINTANILLA JR’s iPhone 14 Pro Max.

8. SA Lane, SA Garza and a CBPO conducted a recorded interview of QUINTANILLA JR. QUINTANILLA JR was advised of his Miranda Rights. QUINTANILLA JR was provided a written copy of the Miranda Warning and attested he understood his rights as were read to him and agreed to answer questions without the presence of an attorney.


9. QUINTANILLA JR admitted to producing a video of child pornography of an approximate 10-year-old minor male (Minor Victim 1 “MV1”). During the interview, SA Lane and SA Garza viewed the video on QUINTANILLA JR’s iPhone 14 Pro Max and confirmed the video met the federal definition of child pornography (“Video 1”). SA Lane reviewed Video 1

on the iPhone 14 Pro Max and the time stamp on the video is 5:22 AM on July 9, 2024. The video contains metadata that indicates Video 1 was taken with an iPhone 14 Pro Max in Spring, Texas. During the interview, QUINTANILLA JR told HSI SAs he took Video 1 in his mother's house in Spring, Texas.

The following is a description of Video 1 – This is an approximately 11 second video. The video depicts an adult hand pulling back the waistband of camouflage colored Calvin Klein underwear to reveal the penis of a prepubescent Caucasian male approximately 10 to 12 years of age.

10. During the interview, QUINTANILLA JR admitted to possessing, receiving, distributing, and producing child pornography. SA Lane observed several additional files that meet the federal definition of child pornography, to include but not limited to:

The following is a description of "Video 2" – This is an approximately 59 second video. The video depicts a fully nude prepubescent Caucasian male approximately 13 to 15 years of age laying on his stomach. During the video, an adult Caucasian male appears to be penetrating the anus of the prepubescent male. A second adult Caucasian male is inserting his penis into the prepubescent male's mouth.

The following is a description of "Image 1" – This image depicts a prepubescent Caucasian male approximately 8 to 10 years of age. The prepubescent male is laying back on what appears to be a brown-colored chair wearing a blue-colored Nike shirt. The prepubescent male's erect penis is visible in the image. At the top of the image are the words "DAD FUVCK SON .

The following is a description of "Image 2" – This image depicts a prepubescent male approximately 4 to 6 years of age. The prepubescent male is wearing clothing on the top half of his body, and fully nude from the waist down. The prepubescent male is placed on what appears to be a bed, lying on his chest, with his anus and penis visible. An adult Caucasian male's hand is touching the nude left buttocks and hip of the prepubescent male.

11. Based on the foregoing information, your affiant believes there is probable cause to

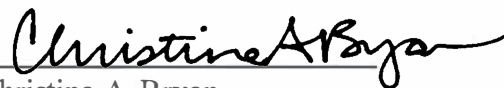
believe on or about July 9, 2024, QUINTANILLA JR was in violation of Title 18 USC 2251 “Sexual exploitation of children” and on or about July 22, 2024, QUINTANILLA JR was in violation of Title 18 USC 2252A(5)(B), “Certain activities relating to child pornography”.



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Lydia Lane  
Special Agent  
Homeland Security Investigations

SUBSCRIBED and SWORN to me, via telephone,  
this 23<sup>rd</sup> day of July 2024, and I find probable cause



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Christina A. Bryan  
United States Magistrate Judge