AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)
v.)
JOSHUA EVAN EDWARDS)
a/k/a Ian Heringa)
JOY ESTHER EDWARDS)
EVAN WILLIAM EDWARDS)
MARY JANE EDWARDS)
a/k/a Mary Jo Heringa)

Defendant(s)

Case No. 6:20- mj-1673

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 June 29, 2019 in the county of Orange in the Middle District of Florida, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1546	Fraud and misuse of visas, permits, and other documents

This criminal complaint is based on these facts:

See the attached affidavit.

☑ Continued on the attached sheet.

Complainant's signature

Javier A. Mondejar, Enforcement Officer, USCBP

Printed name and title

Sworn to before me and signed in my presence.

Date: 9/18/20

Judge's signature

City and state: Orlando, Florida

LESLIE R. HOFFMAN, U.S. Magistrate Judge

Printed name and title

STATE OF FLORIDA

CASE No. 6:20-mj-1673

COUNTY OF ORANGE

AFFIDAVIT

I, JAVIER A. MONDEJAR, Enforcement Officer at Orlando International Airport working for United States Customs and Border Protection ("USCBP") in Orlando, Florida, being duly sworn, state the following:

1. I am a Criminal Enforcement Officer at Orlando International Airport and have been so employed since 2008. Prior to assuming that position, I was a Customs and Border Protection Officer, and have been employed with the agency since 2006. I am responsible for conducting criminal investigations of the criminal statutes contained in the Immigration and Nationality Act, and related offenses contained in Titles 8 and 18 of the United States Code.

2. The statements contained in this affidavit are based upon my own personal knowledge, as well as information provided to me by other law enforcement officials and employees of USCBP. I have not included in this affidavit each and every fact and circumstance known to me, but only the facts and circumstances that I believe are sufficient to establish probable cause.

3. On August 1, 2018, JOSHUA EVAN EDWARDS ("JOSHUA") and JOY ESTHER EDWARDS ("JOY") each presented a Form I-129, L1A Visa Application, U.S. Citizenship Immigration Services (USCIS) and supporting documentation, to the USCBP Officer at Edmonton International Airport, Alberta, Canada and boarded a United Airlines Flight #2084 to George Bush International

Houston Airport in Texas. The USCIS Form I-129 was forged, and included false representations concerning their employment. Upon presentment of the Form I-129 to USCBP, USCBP issued L1A visas to both JOSHUA and JOY and they were admitted into the United States with L1A, nonimmigrant visas.

4. On August 5, 2018, EVAN WILLIAM EDWARDS ("EVAN"), MARY JANE EDWARDS ("MARY"), presented a Form I-129, along with supporting documentation, as support of an L1A Visa application for EVAN, and an L2 Visa application for MARY to the USCBP Officer at Edmonton International Airport, Alberta, Canada and boarded a United Airlines Flight #2084 to George Bush International Houston Airport in Texas. The USCIS Form I-129 was forged, and included false representations concerning their employment. Upon presentment of the Form I-129 to USCBP, USCBP issued an L1A visa to EVAN and an L2 visa to MARY, and they were admitted into the United States on their respective nonimmigrant visas.

5. On or about June 29, 2019, EVAN, MARY, JOSHUA and JOY flew from Edmonton International Airport to Orlando International Airport on board Swoop Airlines Flight #792 from Alberta, Canada. Upon arrival at Edmonton International Airport, EVAN, MARY, JOSHUA and JOY proceeded to the primary inspection station and requested admission into the United States. EVAN presented a Canadian Passport (#HP241064), MARY presented a Canadian Passport (#HL519476), JOSHUA presented a Canadian Passport (#HL518485)

and JOY presented a Canadian Passport (#HL519476) bearing their names and photographs as well as their respective stamps indicating their nonimmigrant visa status. The USCBP Officer reviewed the documents and admitted EVAN, JOSHUA, JOY as L1As and MARY as an L2, in to the United States until August 03, 2021.

6. CBP Criminal Enforcement Unit (CBP/CEU) discovered the violations on the Visa Applications during an investigation by the U.S. Secret Service Office in Orlando as CBP/CEU is part of the Task Force for the Orlando Office. The Form I-129s submitted by EVAN, MARY, JOSHUA, and JOY were all purportedly signed by an individual, W.G. These forms represented that EVAN, JOSHUA and JOY would be working in the United States on behalf of W.G., in the name of ASLAN International Ministry, Inc.

The L2 visa obtained by MARY was predicated on the L1A visa application of her husband, EVAN.

7. On September 11th and September 18th, 2020, Edmonton Police Department conducted interviews of W.G., and W.G.'s son. W.G.'s son indicated that his father has had dementia since 2017 and has not been able to sign any documents. W.G.'s son denied any knowledge that W.G.'s signature was on any documents related to visa applications or job offers for the Edwards family. W.G.'s son stated that W.G. resigned from the board of ASLAN International Ministry in 2007 and W.G.'s son has not signed anything related to ASLAN International

Ministry on his father's behalf.

8. Based upon the foregoing, your affiant submits that there is probable cause to believe that, on or about June 29, 2019, in the Middle District of Florida, EVAN WILLIAM EDWARDS, MARY JANE EDWARDS, JOSHUA EVAN EDWARDS and JOY ESTHER EDWARDS knowingly possessed and used a nonimmigrant visa, which they knew to be procured by means of a false claim and statement, otherwise procured by fraud, and unlawfully obtained, in violation of 18 U.S.C. § 1546(a).

FURTHER AFFIANT SAYETH NAUGHT.

Javier A Mondejar
Criminal Enforcement Officer
U.S. Customs and Border Protection

Sworn and subscribed to before me on this
18th day of September, 2020, in Orlando, Florida.

LESLIE R. HOFFMAN
United States Magistrate Judge