

FILED

AO (Rev. 5/85) Criminal Complaint

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION
CRIMINAL COMPLAINT

UNITED STATES OF AMERICA

vs.

CASE NUMBER: 2:07-MJ 1020 DNF

MARY BONN


I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about February 2, 2007, in Collier County, in the Middle District of Florida, the defendant, Mary Bonn, did

knowingly or in reckless disregard, conceal and harbor an alien of the United States, to wit: Karen Yulissa Olson, from detection, while knowing that Karen Yulissa Olson had unlawfully entered and remained in the United States, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

I further state that I am a Special Agent with Immigration and Customs Enforcement, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No



Signature of Complainant
Robert Lentz

Sworn to before me and subscribed in my presence,

February 5, 2007

at

Fort Myers, Florida

Douglas N. Frazier
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Robert L. Lentz, being first duly sworn, do hereby depose and state: I am a Special Agent (S/A) with the United States Department of Homeland Security, United States Immigration and Customs Enforcement, (DHS/ICE) assigned to the Office of Investigations, Resident Agent In Charge, Fort Myers, Florida (RAC/FM). I have been employed by DHS/ICE since the agency's creation in March 2003. I have received extensive training in the areas of law within the jurisdiction of the DHS/ICE. As a Special Agent, my duties include the enforcement of the immigration laws including offenses, which involve the smuggling and/or harboring of illegal aliens.

This affidavit is made in support of an arrest warrant for Mary Bridgett Bonn, for unlawfully concealing or harboring an alien of the United States, in violation of 8, United states Code, 1324(a)(1)(A)(iii).

In December of 2006, the RAC/FM initiated an investigation of Mary Bonn's role into the human smuggling and/or harboring of illegal aliens in the United States, more specifically as it relates to a young Guatemalan female child named Karen Yulissa Juarez, born May 29, 2005, in Amatitlan, Guatemala. Mary Bonn is an adoption facilitator, contracted by adoption agencies to oversee foreign adoptions. Mary Bonn was the facilitator for A Field of Dreams, which Steven and Roslyn Olson had contracted with for a healthy Guatemalan girl.

According to documents obtained by the United States Embassy in Guatemala, Rosa Claudia Juarez, the biological mother of Karen Yulissa Juarez,

was born on March 24, 1987. Additionally, information contained in a genetic test report, dated November 22, 2005, Associate Laboratory Director, David D. Einum, Ph.D., stated, "the alleged mother, Rosa Claudia Juarez, cannot be excluded as the biological mother of Karen Yulissa Juarez. Based on the genetic testing results, the probability of maternity is 99.98 percent when compared to an untested unrelated woman of the North American Hispanic population. At least 99.98 percent of the North American Hispanic population is excluded from the possibility of being the biological mother of the child."

On February 6, 2006, Steven Wayne Olson and Roslyn Louis Olson, of Washington State, finalized their adoption of Karen Yulissa Juarez (Karen Yulissa Olson); following the formal judicial process in Guatemala. Karen Yulissa Olson was to remain in Guatemala until the Olsons retained the proper documents from the U.S Embassy in Guatemala, to have Karen make legal entry into the United States. Karen Yulissa Olson was issued a Guatemalan passport on February 17, 2006, containing passport number 19712712K. According to ICE computer checks, there has not been an entry documented on this passport, in regards to a legal entry into the United States.

On March 8, 2006, Roslyn Olson arrived at the U.S Embassy in Guatemala to finalize the adoption and bring her adopted daughter to the United States. At the U.S. Embassy, Mrs. Olson was greeted by an interpreter, the foster mother of Karen Olson, and the Olson's baby Karen. However, upon her arrival at the U.S. Embassy in Guatemala, Mrs. Olson learned that her daughter was suffering from malnutrition and behind on developmental milestones, which

was diagnosed by the U.S Embassy Physician. This was the first instance that the Olsons had been informed that their baby was not healthy. Mrs. Olson decided not to finalize the adoption at that time because she wanted to return to the United States to obtain additional medical testing and advice regarding her daughter's medical condition.

In the months to follow March 8, 2006, Steven and Roslyn Olson were misled by Mary Bonn as to the status of their daughter. Mary Bonn told the Olson family that their baby was back with their birth mother and/or in a national orphanage. The Olsons insisted Mary Bonn produce evidence that their child was returned to the birth mother. According to the Olson family, they were very concerned about the status of their daughter, especially since they were legal guardians of Karen Olson. Mary Bonn was unable and unwilling to provide the evidence requested by the Olson family. The Olson family grew increasingly concerned as to the true motives of Mary Bonn. For the remainder of 2006, the Olson family made great strides to locate their daughter. They contacted Mary Bonn, A Field of Dreams, attorneys, Guatemalan adoption specialists, private investigative firms, local law enforcement, federal law enforcement, and even posted their daughter's photo online in hopes that someone would recognize their daughter. Prior to December of 2006, all their efforts were fruitless.

In December of 2006, the Olson's efforts to find their daughter led them to an investigative firm located in Southwest, Florida. Your affiant was contacted by the private investigative firm which led to a criminal investigation to determine the

location of a missing Guatemalan girl who may have been illegally residing in the Southwest, Florida area.

Your affiant received photographs of Karen Olson that were provided to the Olson family by Mary Bonn and A Field of Dreams. The Olsons stated that they were led to believe that the photographs were taken of their daughter, while she was in Guatemala. However, the Olsons were suspicious of the photos due to the appearance of the child, the clothes, jewelry, and the concrete brick paved area surrounding the child in the photograph.

On February 1, 2007, your affiant conducted surveillance of the residence located at 14525 Indigo Lakes Circle, Naples, Florida, 34119, where Mary Bonn is known to reside. During the surveillance, your affiant noticed a distinctive similarity between the brick paved driveway and the brick paved area depicted in several of the photographs provided of the child.

Additionally, on February 1, 2007, your affiant conducted an interview with a neighbor of Mary Bonn. The neighbor, Sergeant Scott Dean, stated that he was 100 percent certain that the young child in the photograph was the same child that lived across the street. On this same day, the Collier County Sheriff's Office assisted by providing a surveillance team to monitor the home of Mary Bonn. At approximately 1700 hours, several members of the surveillance team observed a young Hispanic female playing with other family members and neighborhood kids in the front yard of the residence. The officers confirmed that the young female child matched the child in the photograph.

On February 2, 2007, a federal search warrant was obtained in the Middle District of Florida, for the residence of Mary Bonn, located at 14525 Indigo Lakes Circle, Naples, Florida, 34119. On this date, at approximately 4:30 p.m., DHS/ICE, RAC/FM, assisted by the Collier County Sheriff's Office, executed the search warrant at the aforementioned location. Upon arriving at the location agents identified themselves to Dawn Bonn, who was sitting in a chair on the driveway and made entry into the residence with the assistance of Dawn Bonn, the mother of Mary Bonn. Mary Bonn was encountered while working at her desk. Agents identified themselves to Mary Bonn and explained that a federal search warrant had been issued and handed her a copy of the search warrant. The residence was secured to account for all of the children in the home, making sure none of the children were left unattended either inside the home or outside the home. Once verified, everyone except for Mary Bonn had relocated to the three-car garage, which was previously transformed from a garage to a living area. The Collier County Sheriff's Office, Victim's Advocacy Group, assisted with caring for the younger children in the home.

At approximately 4:30 p.m., your affiant read Mary Bonn her Miranda rights directly from Customs Form 4612. Ms. Bonn understood her rights and consented to an interview, which took place in her office within the residence. A signed waiver of rights, Customs Form 4612, is enclosed within the case file, which contains Ms. Bonn's signature and two witness signatures.

The initial questioning focused on the youngest child at the residence, Isabella Gonzalez Campo Menes, date of birth: 12/11/2005. Ms. Bonn provided

her immigration documents, which included a birth certificate, passport, Immigration Form 94, and the biographical information of the child's mother, Aurora Gonzalez-Campo Menes, date of birth: 01/17/1973. Your affiant asked Ms. Bonn if this was Isabella's true and correct name and information, and she replied, as far as she knew. The only information she had was contained within these documents and had no reason to question the documents. Your affiant asked Ms. Bonn if Isabella's mother's name was true and correct and was in fact, Isabella's biological mother. She replied, as far as she knew. Your affiant asked Ms. Bonn if Isabella was previously identified by another name, a possible previous adoption, and she replied not that she knew of. Ms. Bonn stated she only knew Isabella to have one name.

Your affiant advised Ms. Bonn that Isabella Gonzalez Campo Menes was not the child's true and correct name and had evidence to suggest she knew exactly what the child's true and correct name was. Your affiant asked Ms. Bonn if the child's name was Karen, and she replied yes. Your affiant asked Ms. Bonn if the child's last name was Olson, and she said yes. Your affiant asked Ms. Bonn if the child's biological mother's name was Rosa Juarez, and she said yes. At this time Ms. Bonn raised her tone of voice and said, "the Olsons didn't want that baby, arrest me." Ms. Bonn stated that she saved that baby from Guatemala. She commented that Roslyn Olson wanted the baby, but Steven Olson just wanted his money back.

Your affiant asked Ms. Bonn if she knew the legal guardians of Karen Olson were Steven and Roslyn Olson, and she replied yes. Ms. Bonn stated that

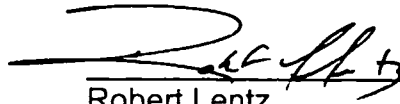
Roslyn Olson left the baby in Guatemala following the March 8, 2006 visit to the United State's Embassy in Guatemala. Ms. Bonn stated that she gave the Olsons a deadline to acquire the child, which she approximates between 4 to 6 weeks after March 8, 2006. Ms. Bonn stated that the child resided with the foster mother during this time, until the child's entry into the United States via Miami International Airport on April 29, 2006.

Ms. Bonn stated that she met Aurora Gonzalez Campo Menes at the Miami International Airport on April 29, 2006. Ms. Bonn stated that she knew Aurora was not the mother of Karen Olson and that all of the documents used to facilitate the entry of Karen Olson into the United States were generated with fraudulent biographical information. Ms. Bonn would not elaborate on the specific arrangements relating to the logistics of Karen's arrival, such as: who funded the travel, was money paid to Aurora Gonzalez, who created the fraudulent documents to obtain the Guatemalan passport, and visa. Based on the fraudulent visa, Isabella Gonzalez Campo Menes, a/k/a Karen Olson, made entry into the United States with Aurora Gonzalez on a B-2 (non-immigrant/pleasure trip) visa. The visa expired October 28, 2006, which indicates Isabella Gonzalez Campo Menes , a/k/a Karen Olson, is in the United States illegally while residing with Mary Bonn.

After April 29, 2006, while Karen Olson was in the custody of Mary Bonn in Naples, Florida, Ms. Bonn advised that she specifically told the Olsons she didn't know where Karen Olson was and suggested that she was either in a national orphanage or returned to the birth mother.

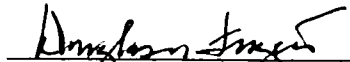
Based upon the foregoing, your affiant believes there is probable cause that Mary Bridgett Bonn knowingly or in reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, concealed, harbored, or shielded from detection, in violation of 8, United States Code, 1324(a)(1)(A)(iii).

FURTHER, YOUR AFFIANT SAYETH NOT



Robert Lentz
Special Agent
Immigration and Customs Enforcement

Sworn to and subscribed before
Me this 5th day of February, 2007.



U.S. Magistrate Judge