

## **APPENDIX B**

Excerpts from trial testimony of witnesses Manzo and Garcia

1 A Well, when we got to the area where the trailer was at,  
2 they just -- the cars stopped, and they told us to get down  
3 very quickly and they would take us down very quickly.

4 Q Now, the -- when you first saw the trailer, it was on  
5 -- it was just on a road, just had turned -- it was just  
6 turned off of a road; is that correct?

7 A I really don't know. I just felt that there were no  
8 rocks or stones where the trailer was at.

9 Q You -- it sounds like you really don't remember much  
10 about -- at all about where the trailer was; is that fair?

11 A I don't know because you couldn't really see it, you  
12 couldn't make it out. It was dark, it was at night.

13 Q And it sounds like you were told to get into the  
14 trailer as fast as possible without looking around; is that  
15 also fair?

16 A Yes. To get down.

17 (Pause)

18 Q Is it correct that you never saw anyone who was the  
19 driver of the truck or the tractor that was attached  
20 eventually to the trailer?

21 A No, because they got us into the truck through the  
22 back.

23 MR. HELMS: Could you repeat that?

24 THE INTERPRETER: No, because they got us into the  
25 truck through the back.

1 BY MR. HELMS:

2 Q Now, I believe that you said that the truck -- after  
3 you had started moving, that it stopped.

4 A Yes. The trailer did roll for about 15 minutes and  
5 then it stopped for a moment.

6 Q About how long did it stop?

7 A About four or five minutes at the most.

8 (Pause)

9 Q And when it stopped, do you have any idea were you in a  
10 road with cars passing or do you have any idea?

11 A No. Just that it stopped for about four or five  
12 minutes and then it continued its way to the Checkpoint.

13 Q Is there anything else that you can remember about when  
14 it stopped?

15 A No. It would just -- it was like the sound -- it was  
16 kind of like maybe like if they were tightening up the tarp.  
17 We, for a moment, thought that it was Immigration, but it  
18 wasn't.

19 Q Mr. Manzo-Jimenez, --

20 A Yes.

21 Q -- we've talked about how you were moved around, tired,  
22 hungry, stressed, scared, rushed. Is it fair to say the --  
23 and that it was dark. Is it fair to say that given all  
24 that, your ability to perceive things was not at the level  
25 of if you were in a regular, everyday situation?

1 A I don't understand what it is that you're trying to  
2 tell me with that.

3 Q Well, given the situation that you were in,  
4 disoriented, tired, stressed, being rushed around, is it  
5 fair to say that your ability to perceive things and  
6 remember things was probably not where it would normally be  
7 in everyday life?

8 MR. ISAAC: Objection, Your Honor, asked and  
9 answered.

10 A No.

11 THE COURT: Sustained. And he said he didn't  
12 understand the question. He's answered the question. He  
13 said, no. So we'll just move on from there.

14 MR. HELMS: Okay. I'll pass the witness, Your  
15 Honor?

16 MR. ISAAC: Nothing further at this time, Your  
17 Honor. Thank you.

18 THE COURT: Thank you. Mr. Manzo, --

19 THE WITNESS: Yes.

20 THE COURT: -- you are done with your testimony.  
21 So I'm going to ask that you go back down the stairs. Be  
22 careful when you go. You can leave your headset there on  
23 the little table in front of you.

24 THE WITNESS: Thank you very much.

25 THE COURT: Thank you, sir. And then you can put

1 your mask back on. Who's the next witness?

2 MR. HELMS: Thank you, Your Honor. The Government  
3 calls Jose Manuel Vega-Garza. Excuse me, Garcia.

4 (Pause from 9:26 a.m. to 9:27 a.m.)

5 THE CLERK: Please raise your right hand.

6 JOSE MANUEL VEGA-GARCIA, GOVERNMENT'S WITNESS, SWORN

7 THE COURT: Sir, you can remove the shield, and  
8 then just move your mask down so that we can hear you. You  
9 can remove the shield. There you go. That's good. No, no,  
10 no, that's perfect. And then just move up closer. You can  
11 roll the chair closer. Yeah, it's hard to move. There you  
12 go, perfect. Thank you. Go ahead.

13 MR. ISAAC: Thank you, Your Honor. Good morning,  
14 sir.

15 THE WITNESS: Good morning.

16 DIRECT EXAMINATION

17 (Testimony translated through interpreter)

18 BY MR. ISAAC:

19 Q Is your name Jose Manuel Vega-Garcia?

20 A Yes, correct.

21 Q Were you illegally present in the United States on  
22 March 19th, 2021?

23 A Yes.

24 Q Mr. Vega-Garcia, did you have documentation from the  
25 United States Government allowing you to be in this country?

1 A No.

2 Q Where are you a citizen of?

3 A Mexico.

4 Q Did you make arrangements to be smuggled into the  
5 United States illegally?

6 A Yes. I found a ride into Tamaulipas.

7 Q And how much were you going to pay to be smuggled into  
8 the United States?

9 A I was going to pay 10,000. I paid 5,000 upon arriving  
10 to Tamaulipas.

11 Q And who did you pay that money to?

12 A The thing is that I got to Tamaulipas and I asked. And  
13 when I asked, I was taken to a person. And I really didn't  
14 know that person.

15 Q And, Mr. Vega-Garcia, where were you going to pay the  
16 other 5,000?

17 A Well, when I arrived, what's the name of the, you know,  
18 like the center of Texas -- well, I forgot the name but it  
19 was in Texas.

20 Q So just to be clear, sir, you were going to pay the  
21 remaining \$5,000 once you got to the United States.

22 A Correct.

23 Q And who were you going to pay that to?

24 A Well, once I arrived to that place in Texas, you know,  
25 because after I arrived to that place in Texas, I was going

1 to be taken to my final destination which was Indianapolis.

2 Q Could you please tell us how your journey to the United  
3 States started? For example, did you start in a house  
4 first?

5 A I don't understand your question very well.

6 Q Let me answer -- let me give you a better question,  
7 sir. Tell us how you first made your way to the United  
8 States.

9 A Well, basically what I did was that I took a bus from  
10 Cuernavaca Morelos to Tamaulipas. And once I got to  
11 Tamaulipas, that's when I got to like the center of town,  
12 that's when I asked for that person. And, well, they took  
13 me to this person and then that person, you know, I crossed  
14 the river. And then after I crossed the river, I was taken  
15 to a trailer, sort of like a trailer home. And after that,  
16 like 15 days later, they came for us and they took us to the  
17 trailer. And they took us to the trailer, we got on the  
18 trailer, and that's when we were stopped at the Checkpoint.

19 Q And, sir, in your journey to the United States, were  
20 there people instructing you on where to go or what to do?

21 A No. Basically I was just guiding myself by instinct.

22 Q When you got to the United States, how did you know  
23 which mobile home to go to?

24 A I'm sorry, not -- about the question, the prior  
25 question, you were asking about when I got to the United

1 States.

2 Q Yes, sir.

3 A No, no, I'm sorry, I apologize. There I was being  
4 taken by someone. I wasn't on my own.

5 MR. ISAAC: Thank you for clarifying, sir. And  
6 please excuse me if my question was confusing.

7 THE WITNESS: I'm sorry.

8 BY MR. ISAAC:

9 Q So it sounds like you eventually did cross into the  
10 United States with guidance from someone else.

11 A Yes.

12 Q And just so I'm understanding you correctly, you stayed  
13 in the United States for some time before you were taken to  
14 a trailer.

15 A Yes, for about 15 days.

16 Q And just very briefly I'd like to ask you about that,  
17 if that's okay.

18 A I'm sorry?

19 Q I'd like to ask you about that, please.

20 A Oh, okay.

21 Q Who took you from the house to the trailer?

22 A From the house to the trailer, well, a truck showed up  
23 and that truck took us from the house to the trailer.

24 Q Did that truck know where to go?

25 A I wouldn't be able to tell you anything about that.



1 The truck just came for us.

2 Q Did that truck eventually drop you off at the trailer?

3 A Yes. The truck parked in front of the trailer, and  
4 then they told us to go along the side, sort of like past  
5 where the person drives. And then there was a person there.

6 Q Who was that person there?

7 A We were not able to see the person because they told us  
8 to just like keep our heads down, to like, you know, look  
9 down so that we wouldn't be able to see anything.

10 Q Were you able to tell if the tractor was attached to a  
11 trailer?

12 A What do you mean? Like if the back was connected to  
13 the trailer?

14 Q Yes, sir. If there was a vehicle or a car in the front  
15 and there was a trailer attachment behind it.

16 A Oh, no. We just got into the trailer, you know, like  
17 behind. It's connected to the cabin. But we got into that.

18 Q And what was the ground like on then -- when the  
19 trailer was sitting down on the ground, could you tell what  
20 the ground was like?

21 A The ground was like concrete.

22 Q And, sir, last question. Did you eventually get  
23 arrested at a United States Border Patrol Checkpoint?

24 A I didn't understand very well. What was that?

25 Q Did you eventually get arrested at a United States