

AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Original



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

GUADALUPE BLANCO,

Defendant.

Case No. 8:25-mj-00197-DUTY

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

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 January 10, 2025 in the county of Orange in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 641

Offense Description

Theft of government property

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

/s/ Mackenzie Lilly

Complainant's signature

Mackenzie Lilly, Special Agent (FBI)

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

3/14/25

Judge's signature

City and state: Santa Ana, California

Hon. Autumn D. Spaeth, U.S. Magistrate Judge

Printed name and title

AUSA: Mark Takla x-3591

AFFIDAVIT

I, Mackenzie Lilly, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), and have been so employed since January 2018. I am currently assigned to the Los Angeles Office, Orange County Resident Agency violent crime squad. I investigate, among other things, violent crimes to include child pornography, child sexual exploitation crimes, and sex trafficking of children, in the Central District of California. During my tenure with the FBI, I have participated in the execution of federal search and arrest warrants in a variety of criminal investigations. As part of my duties as an FBI agent, I have participated in investigations involving but not limited to child exploitation, mail fraud, wire fraud, fraud against the government, theft of trade secrets, drug trafficking organizations, and criminal enterprise investigations. Moreover, I am a federal law enforcement officer engaged in enforcing criminal laws, including 18 U.S.C. § 641 (theft of government property).

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of an arrest warrant and criminal complaint charging GUADALUPE BLANCO ("BLANCO") with theft of government property, in violation of 18 U.S.C. § 641.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and

information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

III. STATEMENT OF PROBABLE CAUSE

A. Property Stolen from U.S. Army Reserve Center

4. According to Tustin Police Department ("TPD") Crime Reports, I learned the following:

a. On January 10, 2025, TPD officers responded to a report of a burglary at the U.S. Army Reserve Center located at 15992 Red Hill Avenue, Tustin, California.

b. The Army Facility Manager for the Reserve Center in Tustin told a TPD officer that an unknown person entered an Army storage facility and forced entry into several storage cages by cutting padlocks.

c. Regarding the entry into the facility, the Army Facility Manager stated he discovered multiple denied entries to the "Storage Reader 2" door by someone attempting to access the facility on January 8, 2025 between 11:14 p.m. and 11:18 p.m.¹ At 11:18 p.m., someone entered the correct pin code and was granted access. The Army Facility Manager stated that the

¹ Storage Reader 2 requires that someone depress a numerical pin code in order to access the facility.

correct pin code used was assigned to him, and that he has provided the pin code to others in the past.

d. U.S. Army personnel told a TPD officer that the following property belonging to the United States was stolen: at least two High Mobility Multipurpose Wheeled Vehicles ("HMMWVs"), Army tactical gear, Army uniforms, machine gun mounts, medical gear, binoculars, and bayonets. The Army estimated the value of the stolen property to be in excess of \$200,000.

e. TPD notified local law enforcement and the public through a social media posting to "Be on the Lookout" ("BOLO") for the missing HMMWVs.

B. Recovery of Stolen Vehicles

5. According to TPD Crime Reports, I learned the following:

a. On January 10, 2025, a Fish and Game Warden contacted TPD after reviewing the BOLO and told TPD personnel that he saw the HMMWV parked in a parking lot next to First Southern Baptist Church in Orange, California. TPD recovered one HMMWV at that location.

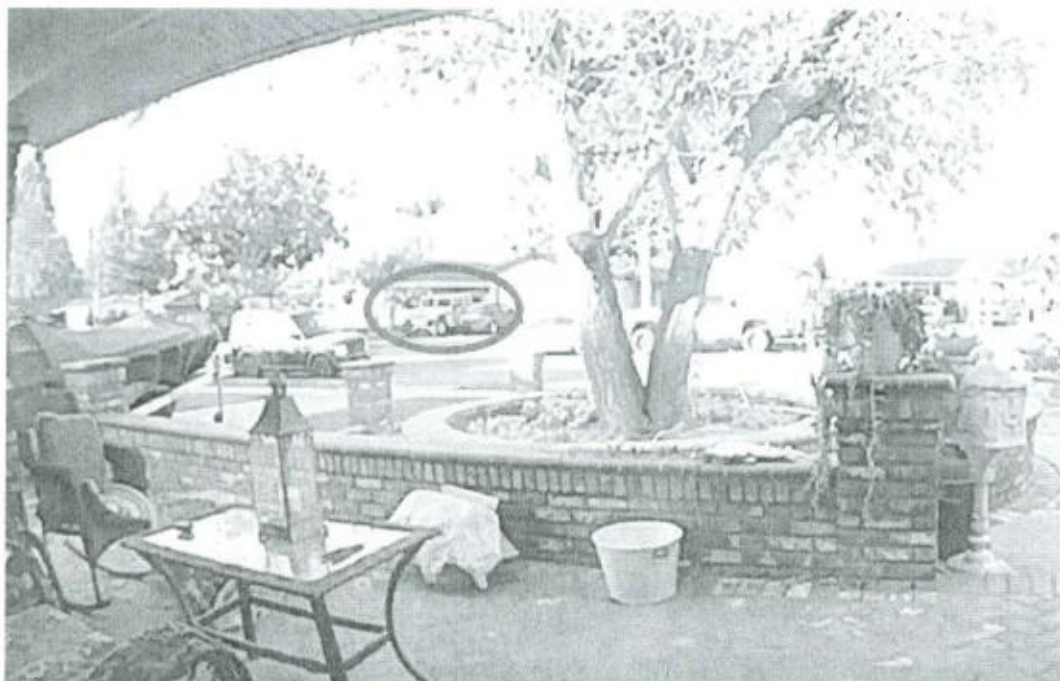
b. On January 11, 2025, a Santa Ana Police Officer found the second HMMWV near South Clara Street and Wilshire Avenue in Santa Ana, California. This HMMWV was located on the side of the street and appeared to have spray paint covering identifiable markings on the exterior of the HMMWV.

C. Identification of REYES and Other Participants

6. According to TPD Crime Reports, I learned the following:

a. A private citizen with the initials K.B. told TPD that on January 9, 2025 at 1:30 a.m. he was returning to his home and saw a military-style HMMWV backed in the driveway of a residence on N. Highland Street, Orange, California. K.B. saw four individuals loading or unloading the HMMWV. K.B. stated he was not sure whether the address was 660 N. Highland Street or 640 N. Highland Street, but stated he was "pretty sure," or words similar, that he saw the HMMWV at 640 N. Highland Street after he drove by the address accompanied by a TPD officer. K.B. noted that there was an American flag displayed at 640 N. Highland Street.

b. On January 15, 2025, TPD reviewed footage from a Ring doorbell camera at a residence across the street in the vicinity of 640 N. Highland Street, Orange, California. The footage showed a HMMWV parked in the driveway at 640 N. Highland Street, Orange, California on several occasions on January 9 and 10, 2025. Below is a screenshot from that footage:



D. REYES's Honda Civic Was at the Crime Scene

7. According to California Department of Motor Vehicles records, several cars are registered to ALFREDO REYES ("REYES") at 640 N. Highland Street, Orange, California, to include a white Honda Civic with California license plate 8ULF155 ("Honda Civic").

8. As reflected on Google maps and based on my personal knowledge, the Army Reserve Center is at the corner of Red Hill Avenue and Warner Avenue in Tustin.



9. According to TPD Crime Reports, I learned the following:

a. The National Vehicle License System ("NVLS") which reads and tracks license plates at various locations, showed that REYES's Honda Civic was at the intersection of Red Hill Avenue and Warner Avenue in Tustin on January 8, 2025 at approximately 10:58 p.m. (16 minutes prior to the first entry attempt).

b. The NVLS showed REYES's Honda Civic again at the intersection of Red Hill Avenue and Warner Avenue in Tustin on Tustin on January 9, 2025 at approximately 12:37 a.m. and at the intersection of Warner Avenue and Grand Avenue in Tustin on January 9, 2025 at 12:37 a.m.

c. According to close captioned television footage from a business located at Warner Avenue and Grand Avenue in

Tustin, a white Honda Civic² followed two HMMWV through the intersection on January 9, 2025 at approximately 12:38 a.m.

E. Department of Defense Database Records

10. According to records provided by the Department of Defense ("DoD"), I learned that REYES is a retired U.S. Army Reserve Staff Sergeant and worked as a civilian at Joint Training Base Los Alamitos.

F. Search of REYES's Residence and Arrest of REYES

11. According to the TPD Crime Reports, on January 16, 2025, TPD arrested REYES in Los Alamitos pursuant to an arrest warrant for violations of California Penal Code sections 459 (Burglary) and 487(D)(1) (Grand Theft Auto). On January 16, 2025, law enforcement executed a search of REYES's residence at 640 N. Highland Street, Orange, California. Among other items, law enforcement found:

- a. (1) 25mm Sabot;
- b. (1) M18 smoke grenade;
- c. (1) M159 Star cluster;
- d. (1) M195 Star cluster;
- e. (1) M72 LAW Rocket tube;
- f. (1) AT4 Tube;
- g. (1) Javelin Tube;
- h. (1) 155mm artillery round;
- i. (1) M18 Smoke Grenade;
- j. (1) M83 Smoke Grenade; and

² From the footage, the white Honda Civic could not be positively identified as REYES's Honda Civic, but only that the vehicle was a white Honda Civic.

k. (1) .50 Caliber tracer round.

12. According to TPD, REYES was released on bond later that day. According to the Department of Defense, the above items are military property.

G. Text Messaging

13. I reviewed data extracted from REYES's cellular phone pursuant to a state and subsequent federal search warrant and found text messages that appeared related to the theft of military property. From the review, I learned the following:

a. Telephone number (714) 737-0996 ("Telephone 2") was saved in REYES's phone under the name "Pillo."³

b. On or about November 29, 2024, REYES and Telephone 2 exchanged the following messages:

REYES: So I might come up one one
Shhhhhh [sends finger over mouth emoji]

Telephone 2: [sends emoji of smiling face with glasses]

REYES: Aaaand
Hmww. This time for reals

Telephone 2: [sends emoji of face showing teeth]

REYES: If you have space we can do it.
But...This is gonna be a stolen
military vehicle
Can you hide it

Telephone 2: [sends emoji with one eyebrow
raised and hand on chin]
what was the other
[sends two emojis of face laughing
with tears]

REYES: Stolen lol
wanna pick one up tomorrow??

³ "Pillo" is Spanish for rascal.

or wait

Telephone 2: [sends a Meme of Bart Simpson with the text "oh okay" in front of a bush]

REYES: lol Let's wait. I kinda want another one too

Telephone 2: [sends emoji of face laughing with tears]

REYES: I would say let's get one of these [sends a photo of what appears to be a dark green military style Humvee]

Telephone 2: wth...is there already

REYES: [sends emoji of person with hands out and shoulders shrugging]

Telephone 2: Fk it

REYES: That was earlier in the year. But no...they suck

Telephone 2: [sends emoji of face with eyes looking up and no smile]

REYES: Like completely. 100 blind spots and they suck to drive

Telephone 2: Four door?

REYES: I'll cruise by your pad with one. Next week. You can try it yourself Yeah 4 door

[BREAK]

REYES: So.....when do you want the hummwv so I can plan it

Telephone 2: thought u said tomorrow [sends emoji of face with glasses and smiling] u tell me [sends emoji with hands out and shoulders shrugging]

REYES: we can lol

c. On January 8, 2025 between approximately 8:38 p.m. and 9:58 p.m., REYES and Telephone 2 exchanged the following messages:

REYES: Wake up
I'm going to your pad
you have bolt cutters??

Telephone 2: I'm going to your pad [sends emoji
of face with glasses and smiling]
???

REYES: Sup
Hey
You have the bolt cutters???

Telephone 2: Yo...
No bolt cutters..
Got a grinder

REYES: Yep
I your en

Telephone 2: Orange [sends emoji of face with
glasses and smiling]

REYES: Meet me at the pad
Really???
Answer!!!

d. On January 9, 2025 between approximately 3:27 a.m. and 3:28 a.m., REYES and Telephone 2 exchanged the following messages:

Telephone 2: U there yet?

REYES Yes

Telephone 2: Aight..

e. On January 10, 2025 at approximately 6:55 p.m., REYES and Telephone 2 exchanged the following messages:

REYES: Wanna take it now?
I'm here at my suegras⁴

⁴ "Suegras" is Spanish for mother-in-law.

f. On January 10, 2025 at approximately 10:03 p.m., REYES and Telephone 2 exchanged the following messages:

REYES: Just saw a hmwv driving past me on the street [sends emoji of laughing face with tears]

Telephone 2: Wtf

REYES: Yep. So one recovered

H. Subscriber Records for Telephone 2

14. I have reviewed records from AT&T and learned that Telephone 2 was registered to "L B" at 1217 S. King Street, Santa Ana, CA 92704 ("King Street residence").

15. According to a Tustin Police Report, a law enforcement database shows that Telephone 2 is associated with an individual named "Guadalupe Blanco."

I. Surveillance of the BLANCO's Residence

16. On March 5, 2025, I conducted surveillance at the King Street residence and observed the following:

a. At approximately 8:08 a.m., a Hispanic male left the residence and got into a white Chevrolet Express Van and moved it from the street to the driveway of the King Street residence. Based on his California Department of Motor Vehicles ("DMV") photo, I identified the male as BLANCO.

J. Search of BLANCO's Residence

17. On March 14, 2025, law enforcement searched the King Street residence pursuant to a search warrant. I learned the following from law enforcement officials executing the search. During the search, law enforcement observed a black/gray iPhone

in the residence. BLANCO identified the black/gray iPhone as his. Law enforcement called Telephone 2 and the black/gray iPhone rang in the residence. BLANCO later provided the passcode to the black/gray iPhone.

K. Cell Site Analysis of Telephone 2 (BLANCO's Phone)

18. According to records from AT&T and my discussions with agents who specialize in cellular location data who have reviewed that data, Telephone 2 (BLANCO's Phone) was active on cell towers that provided coverage to the U.S. Army Reserve Center on January 8, 2025 at the approximate time when the crime occurred.⁵

IV. CONCLUSION

19. For all the reasons described above, there is probable cause to believe that BLANCO knowingly engaged in the theft of government property with a value of more than \$1,000, in violation of 18 U.S.C. § 641.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 14 day of March, 2025.



HONORABLE AUTUMN D. SPAETH
UNITED STATES MAGISTRATE JUDGE

⁵ Based on my training and experience and my discussions with other agents who specialize in cellular location data, I know that mobile locator data often cannot pinpoint the exact location of a cellular telephone but can provide an approximate area radius.