

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**

9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,

11  
12 Plaintiff,

13 v.

14 SHAWN ERROL FARRAR

15  
16 Defendant.

Case No.: '24 MJ1372 DEB

COMPLAINT FOR VIOLATION OF

Title 18 U.S.C. Sec 641  
Theft of United States' Property  
(Felony)

17  
18 The undersigned complainant being duly sworn states:

19 On or about March 29, 2024, within the Southern District of California, Shawn Errol  
20 FARRAR, did knowingly steal and purloin property belonging to the United States Border  
21 Patrol, a department or agency of the United States, namely government issued firearms,  
22 government issued law enforcement gear, law enforcement canine, and a law enforcement  
23 vehicle, from the Imperial Beach Border Patrol Facility, of a value exceeding \$1,000.00, in  
24 violation of Title 18, United States Code, Section 641, a felony.

25 //

26 //

27 //


28 //

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

VALERIE F HOFER Digitally signed by VALERIE F HOFER  
Date: 2024.04.09 14:58:33 -07'00'  
\_\_\_\_\_  
Valerie Hofer, Special Agent  
Homeland Security Investigations

Sworn and attested to under oath by telephone, in accordance with Federal Rule of Criminal Procedure 4.1, this 9 day of April 2024.

  
\_\_\_\_\_  
HON. D. THOMAS FERRARO  
U.S. MAGISTRATE JUDGE

**STATEMENT OF FACTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**A. INTRODUCTION**

1. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause. Date and times are approximate.

**B. PROBABLE CAUSE**

2. On March 29, 2023, between 3:30 p.m. and 4:20 p.m., Shawn Errol FARRAR (“FARRAR”), without permission, entered a secure parking lot at the Imperial Beach Border Patrol Station (“IB-BP Station”), located at 1802 Saturn Boulevard, San Diego, California 92154. An unmarked Border Patrol vehicle (“BP Vehicle”) was parked in the secured lot, with the keys in the ignition and the engine on to provide air-conditioning for the canine secured in a kennel in the BP Vehicle. The BP Vehicle contained three firearms, miscellaneous law enforcement equipment, and a law enforcement trained canine. According to Border Patrol officials, the preliminary estimated fair-market value of the aforementioned equipment, and canine amounted to approximately \$105,277.41. FARRAR drove the BP Vehicle out of the secured lot without permission.

Thereafter, at approximately 7:30 p.m., San Diego Police Department officers located the BP Vehicle and conducted a traffic stop. FARRAR was driving the BP Vehicle and initially failed to yield to law enforcement. FARRAR was wearing a Border Patrol uniform at the time law enforcement conducted the traffic stop. The Border Patrol uniform was left in the BP Vehicle by a Border Patrol Agent, it did not belong to FARRAR. FARRAR is not a Border Patrol Agent. When asked how he was in possession of the BP Vehicle, he stated “I went there, and they gave me this car.” He also spontaneously stated that he climbed the fence to gain access inside the facility.

FARRAR was, thereafter, taken into state custody.

//  
//

1 During a post-*Miranda* interview, FARRAR stated he walked to the IB-BP Station  
2 and a Border Patrol Agent let him into the IB-BP Station through the front gate. This  
3 assertion was contrary to Farrar’s earlier statement where he informed officers that he  
4 climbed the fence. FARRAR also said that he was told everything he needed to complete  
5 his assignment was inside the BP Vehicle. He said he drove the BP Vehicle out of the front  
6 gate of the Border Patrol station, to Camp Pendleton, and then to Mission Valley where he  
7 was stopped by law enforcement. FARRAR stated the BP Vehicle said “USM” on it, which  
8 he believed to mean “US Military.” FARRAR stated he used to work for the military and  
9 that’s how he got the uniform he was wearing and that’s why he needed that car. FARRAR  
10 stated he is a private contractor for Farrar Investigative Security Services.

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28