

AO 91 (Rev. 1-1-13) Criminal Complaint

**FILED****10/5/2025****THOMAS G. BRUTON**  
**CLERK, U.S. DISTRICT COURT**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MARIMAR MARTINEZ and  
ANTHONY IAN SANTOS RUIZ

CASE NUMBER: 25 CR 636

**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 October 4, 2025, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants violated:

*Code Section*Title 18, United States Code, Section  
111(a) and (b)*Offense Description*

forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in Title 18, United States Code, Section 1114, namely an officer and employee of the United States, while he was engaged in the performance of his official duties, and in the commission of such acts used a deadly and dangerous weapon

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

*Caitlin Malone /by HKM*

CAITLIN MALONE

Special Agent, Federal Bureau of Investigation  
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: October 5, 2025 at 8:03 a.m.*Heather K. McShain**Judge's signature*City and state: Chicago, IllinoisHEATHER K. MCSHAIN, U.S. Magistrate Judge  
*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

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**AFFIDAVIT**

I, CAITLIN MALONE, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigations (“FBI”), and I have been so employed since April 2023. I am currently assigned to FBI Chicago’s Counterterrorism Branch – International Terrorism squad. In my duties as a Special Agent, I handle initial threat information, material support to foreign terrorist organizations, and acts of terrorism. I also routinely assist with other criminal investigations. I have completed 18 weeks of extensive training at Quantico, Virginia. Through my employment with the FBI, I have gained knowledge in the use of various investigative techniques including the utilization of physical surveillance, investigative interviews, financial investigations, the service of administrative and grand jury subpoenas, and the execution of search and arrest warrants, including the execution of search warrants involving electronic evidence. As a Special Agent, I am authorized by law or by a government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of federal criminal laws.

2. This affidavit is submitted in support of a criminal complaint alleging that Marimar MARTINEZ and Anthony Ian Santos RUIZ have violated Title 18, United States Code, Section 111(a) and (b). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a

criminal complaint charging MARTINEZ and RUIZ with assault on a federal officer using a deadly or dangerous weapon, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, as well as information I have received from other law enforcement personnel and from people with knowledge regarding relevant facts, photographs received from various law enforcement personnel, body worn camera footage, and my training and experience.

**A. Summary of Probable Cause**

4. On or about October 4, 2025, Border Patrol Agents (“BPAs”) 1, 2, and 3 with United States Customs and Border Protection (“CBP”) conducted an operation during which the BPAs acted as security detail while driving a silver Chevrolet Tahoe (the “CBP Vehicle”). While operating the CBP Vehicle and in the course of their official duties, the BPAs were followed by a convoy of civilian vehicles, including a silver Nissan Rogue (the “Martinez Vehicle”) driven by MARTINEZ and a black GMC Envoy (the “Ruiz Vehicle”) driven by RUIZ. The convoy of civilian vehicles followed the BPAs closely and pursued the BPAs aggressively, culminating in MARTINEZ, in the Martinez Vehicle, and RUIZ, in the Ruiz Vehicle, driving into and striking the CBP Vehicle on both the driver’s and passenger’s side, respectively, leading to a temporary loss of control of the CBP Vehicle. In addition, once the CBP

Vehicle had stopped and the BPAs exited the CBP Vehicle, MARTINEZ drove the Martinez Vehicle at BPA 1.

**B. Facts Supporting Probable Cause**

**1. The Martinez and Ruiz Vehicles Strike the CBP Vehicle**

5. According to the BPAs, on or about October 4, 2025, the BPAs were tasked with operating as a mobile security detail for other CBP agents in other CBP vehicles. The BPAs were assigned the CBP Vehicle for purposes of the operation.

6. According to the BPAs, BPA 1 was the driver of the CBP Vehicle. BPA 2 sat in the rear seat on the driver's side of the CBP Vehicle, while BPA 3 sat in the rear seat on the passenger's side of the CBP Vehicle.

7. According to the BPAs, their assigned area of operation on or about October 4, 2025, was Oak Lawn, Illinois. According to BPA 3, while operating the CBP Vehicle in or around Oak Lawn, multiple civilian vehicles began to follow the CBP Vehicle and vehicles driven by other CBP agents. According to BPA 3, many of the civilian vehicles drove aggressively and erratically towards the CBP Vehicle, including by driving within inches of the CBP Vehicle, pulling up alongside both the passenger's and driver's side of the CBP Vehicle, and disobeying traffic laws, including running red lights and stop signs, driving in the wrong lane, and driving the wrong way down one-way streets in order to pursue the CBP Vehicles.

8. According to the BPAs, BPA 1 drove the CBP Vehicle away from vehicles driven by other CBP agents in an effort to draw the pursuing civilian

vehicles away from the other CBP agents, which ultimately resulted in the BPAs driving the CBP Vehicle northbound on Kedzie Avenue, in Chicago.

9. According to the BPAs, while driving northbound on Kedzie Avenue, the civilian vehicles continued to pursue the CBP Vehicle aggressively. According to BPAs 2 and 3, while operating the CBP Vehicle in approximately the area of 42nd Street and Kedzie Avenue to approximately 39th Street and Kedzie, multiple civilian vehicles attempted to box-in the CBP Vehicle. Specifically, according to BPAs 2 and 3, a dark pickup truck cut in front of the CBP Vehicle, the Martinez Vehicle drove up along the driver's side of the CBP Vehicle, the Ruiz Vehicle drove up along the passenger's side of the CBP Vehicle, and another vehicle drove near the rear of the CBP Vehicle. According to BPAs 2 and 3, the CBP Vehicle regularly used its lights and sirens while driving. In addition, according to BPAs 2 and 3, the driver of the Martinez Vehicle regularly and loudly referred to the BPAs as "la migra."<sup>1</sup>

10. According to the BPAs, at approximately the intersection of 39th and Kedzie, the Martinez Vehicle drove into and side-swiped the driver's side of the CBP Vehicle. A moment thereafter, the Ruiz Vehicle drove into and struck the rear right quadrant of the CBP Vehicle. According to body-worn camera footage collected by

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<sup>1</sup> Based on my training and experience, I know that "la migra" is a common slang term used to refer to immigration enforcement personnel.

BPA 3, the strikes by the Martinez Vehicle and the Ruiz Vehicle happened at approximately 10:29 a.m.<sup>2</sup>

11. According to photos taken of the CBP Vehicle and the Martinez Vehicle, the vehicles both sustained damage consistent with a collision:

**Damage to the Driver's Side of the CBP Vehicle**



**Damage to the Front Passenger Side of the Martinez Vehicle**



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<sup>2</sup> The BPAs were each equipped with body-worn cameras on or about October 4, 2025, but only BPA 3's camera was activated at the time of the incident.



12. According to photos taken of the CBP Vehicle and the Ruiz Vehicle, the vehicles both sustained damage consistent with a collision:

**Damage to the Rear Passenger Side of the CBP Vehicle**



**Damage to the Front Driver's Side of the Ruiz Vehicle**



13. According to the BPAs, after being struck by the Martinez and Ruiz Vehicles, the Martinez and Ruiz Vehicles remained southbound of the CBP Vehicle.

14. According to the BPAs, after being struck and boxed in by the Martinez and Ruiz Vehicles, BPA 1 stopped the CBP Vehicle and the BPAs exited the CBP Vehicle.

15. According to BPA 1 and BPA 2, moments after exiting the CBP Vehicle, the Martinez Vehicle drove northbound at BPA 1. According to BPA 1 and corroborated by the audio of BPA 3's body-worn camera, BPA 1 proceeded to fire approximately five shots from his service weapon at the driver of the Martinez Vehicle. According to BPAs 2 and 3, the Martinez Vehicle proceeded to flee northbound on Kedzie Avenue.

**2. MARTINEZ and RUIZ Were the Drivers of the Martinez and Ruiz Vehicles**

16. According to BPAs 2 and 3 and corroborated by BPA 3's body-worn camera footage, after the collisions, the Ruiz Vehicle backed up on Kedzie Avenue into a parked car, did a U-turn, and proceeded to park at a gas station approximately half a block southbound from the location of the collisions.

17. According to BPAs 2 and 3, the Ruiz Vehicle, and its driver, later identified as RUIZ, stayed at the gas station until RUIZ was arrested by CBP agents.

18. According to a responding paramedic, the Martinez Vehicle was discovered by paramedics at a repair shop near 35th Street and California Avenue,



approximately one mile northeast from the location of the collisions. The driver of the Martinez Vehicle, later identified as MARTINEZ, was taken by ambulance to a hospital where, according to a hospital nurse, MARTINEZ was treated for gunshot wounds.

**C. Conclusion**

19. Based on the foregoing, I respectfully submit that there is probable cause to believe that on or about October 4, 2025, at Chicago, in the Northern District of Illinois, Eastern Division, Marimar MARTINEZ and Anthony Ian Santos RUIZ forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with an officer of the United States, as designated in Title 18, United States Code, Section 1114, more specifically three CBP BPAs, each of whom was engaged in the performance of his official duties and, in doing so, MARTINEZ and RUIZ used a deadly and dangerous weapon, all in violation of Title 18, United States Code, Section 111(a) and (b).

FURTHER AFFIANT SAYETH NOT.

Caitlin Malone /by HKM  
CAITLIN MALONE  
Special Agent, Federal Bureau of  
Investigation

SWORN TO AND AFFIRMED by telephone October 5, 2025.

Heather K. McShain  
Honorable HEATHER K. MCSHAIN  
United States Magistrate Judge