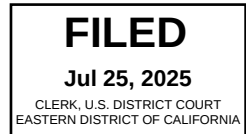


UNITED STATES DISTRICT COURT

for the
Eastern District of California



United States of America
v.

JOSE MANUEL CASTILLO JR.

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Case No. 2:25-mj-0109 CSK

Defendant(s)

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 the date(s) of July 17, 2025 in the county of Sacramento in the
Eastern District of California, the defendant(s) violated:

Code Section
18 U.S.C. § 1361

Offense Description
Willful injury and depredation against any property of the United States

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/

Complainant's signature

HSI Special Agent Tyler R. Breeding

Printed name and title

Sworn to me and signed via telephone.

Date: July 25, 2025

Judge's signature

City and state: Sacramento, California

Chi Soo Kim, U.S. Magistrate Judge
Printed name and title

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I, Tyler Breeding, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND PURPOSE OF AFFIDAVIT

1. On July 17, 2025, agents with the U.S. Customs and Border Protection (CBP) were conducting an operation in a Home Depot parking lot in Sacramento. While agents conducted the operation, Jose Manuel CASTILLO Jr. began shouting in the faces of CBP agents and yelling “fuck you guys.” Agents then saw CASTILLO approach the rear passenger side of a CBP vehicle, and two agents—while standing approximately five feet away from the vehicle—heard a pop and a loud hissing noise coming from the vehicle. Agents looked at the vehicle and noticed that the rear passenger-side tire had been punctured and was quickly losing air. Agents saw CASTILLO walking away from the vehicle and yelled at him to stop. CASTILLO took off running, and agents chased him and detained him. In CASTILLO’s pocket, agents found a short knife with black residue on the blade. The knife was approximately the same width as the hole that had been made in the tire.

2. Based on these facts, as set forth in further detail below, I believe there is probable cause to believe that Jose Manuel CASTILLO Jr. punctured the tire of the CBP vehicle with a knife. I make this affidavit in support of a criminal complaint and summons charging CASTILLO with willful injury and depredation against any property of the United States in violation of 18 U.S.C. § 1361,¹ a Class A Misdemeanor.

II. AGENT BACKGROUND

3. I am a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI") and have been since May 2019. I am currently assigned to the Gang Suppression Unit of the Sacramento Field Office of Investigations, as well as the Sacramento County Sheriff's Department Gang Suppression Unit Task Force. I have investigated criminal violations of Titles 8, 18, 19, and 21 of the United States Code. I have been cross designated by the United States Department of Justice with Title 21 Federal narcotics enforcement authority. As an

¹ 18 U.S.C. § 1361 makes it a crime for any individual to “willfully injure[] or commit[] any depredation against any property of the United States, or of any department or agency thereof.” If the damage to the property does not exceed \$1,000, this crime is a Class A misdemeanor, punishable by a term of imprisonment of no more than one year. 18 U.S.C. § 1361.

1 HSI special agent, I have participated in numerous investigations and search warrants related to
2 violations of various federal laws. I am a graduate of the Criminal Investigator Training Program and the
3 Homeland Security Investigations Special Agent Training course at the Federal Law Enforcement
4 Training Center, where I received extensive training in the investigation and criminal prosecution of
5 Titles 8, 18, 19, and 21 cases. During this period, I received training in Title 18 investigative matters
6 including, but not limited to, assaulting or impeding or a federal officer, and depredation of government
7 property.

8 4. The facts in this affidavit come from my personal observations, training and experience,
9 and information obtained from other agents and witnesses involved in this case. This affidavit is meant
10 to show that there is probable cause for the requested complaint and summons. It does not set forth all
11 my knowledge about this case.

12 **III. PROBABLE CAUSE**

13 5. On the morning of July 17, 2025, agents with the U.S. Customs and Border Protection
14 were conducting an immigration enforcement operation at the Home Depot located at 4641 Florin Rd. in
15 Sacramento, State and Eastern District of California. During the operation, agents saw an individual in
16 the crowd, later identified as Jose Manuel CASTILLO, Jr., filming agents with his cell phone. Agents
17 told CASTILLO several times to move back from where CBP agents were positioned, but CASTILLO
18 did not comply. CASTILLO began shouting in the faces of multiple CBP agents, challenging agents
19 and shouting “fuck you guys” repeatedly as the agents were transferring aliens they had arrested to a van
20 to transport them to immigration custody.

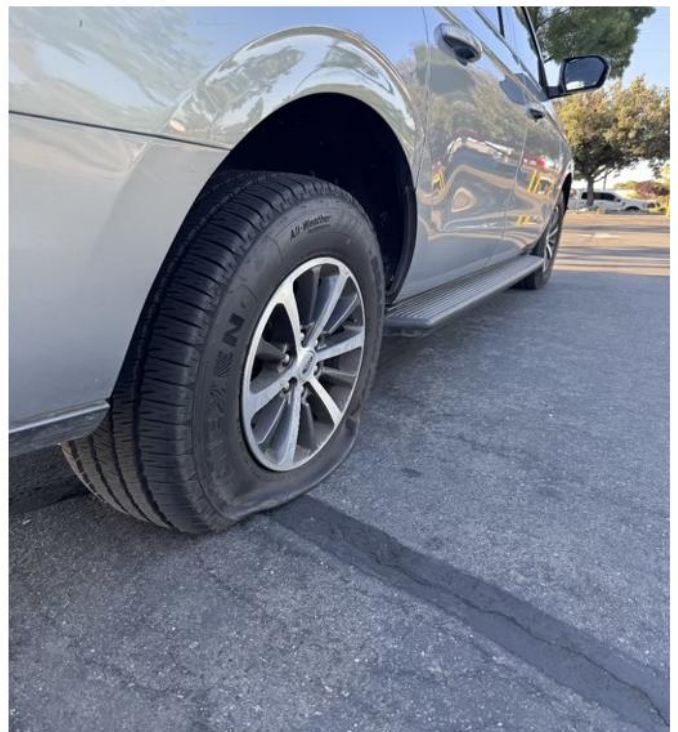
21 6. Near the transport van, agents parked a government-owned gray Ford Expedition to serve
22 as a barrier between the spectators and agents, who were escorting arrested aliens to the van. The
23 Expedition was unmarked, meaning that it did not have any logos indicating that it was a CBP vehicle.
24 But, according to agents at the scene, agents wearing CBP logos exited the Expedition and made
25 multiple trips to the Expedition to retrieve equipment, all within CASTILLO’s view. CBP agents also
26 told CASTILLO multiple times that they were CBP agents.

27 7. At some point, agents saw CASTILLO walk towards the Expedition from the rear
28 passenger side. CASTILLO was the only person near the Expedition. CBP Agents Morales and

1 Mansilla were approximately five feet away from the Expedition's driver's side when they heard a pop
2 and a loud hissing noise coming from the vehicle.

3 8. As CASTILLO was near the Expedition, CBP Agent Escobedo alerted other agents to
4 CASTILLO's presence near the vehicle and then shouted "hey" at CASTILLO. CASTILLO looked at
5 Agent Escobedo and slowly walked away from the Expedition.

6 9. CBP Agent Tuthill approached the Expedition and saw that the rear passenger side tire
7 had a slash in it, and the tire had gone flat, as pictured below:



21 10. Agent Tuthill told his fellow CBP agents that the tire had been slashed.

22 11. By this time, CBP Agent Duenas saw that CASTILLO was standing approximately 15 to
23 20 feet away and constantly looking back over his shoulder at the Expedition. Agents Duenas and
24 Escobedo ordered CASTILLO to stop, but CASTILLO turned and ran away. Agents chased after
25 CASTILLO, caught him, and detained him.

26 12. Agents transported CASTILLO in-custody to a facility in Stockton, California. Once
27 there, they searched CASTILLO and found a knife in the pocket of his pants. The blade of
28 CASTILLO's knife appeared to be approximately the same as the width of the hole of the Expedition

1 tire. The blade of the knife had a black mark on it that appeared to match the color of the Expedition tire
2 that had been slashed, as pictured below:



17
18 Agents booked the knife into evidence.

19 13. According to the America's Tire website, the replacement cost of the Expedition tire that
20 was slashed is less than \$1,000.

21 IV. CONCLUSION

22 10. I believe that there is probable cause to issue the requested criminal complaint and
23 summons for CASTILLO charging him with willful injury and depredation against any property of the
24 United States, in violation of 18 U.S.C. § 1361, a Class A Misdemeanor.

25
26 /s/

27 Tyler R. Breeding
28 Special Agent
Homeland Security Investigations

1
2 Telephonically sworn and subscribed before me this 25 day of July 2025

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4 

5 _____
6 Chi Soo Kim
7 United States Magistrate Judge
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9 Approved as to form:

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11 /s/ Heiko P. Coppola _____
12 HEIKO P. COPPOLA
13 Assistant US Attorney
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