

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Margaret A. Steindorf (312) 353-3540

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EDDIE ARGUELLES

CASE NUMBER: 25 CR 437

FILED
7/30/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

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 May 14, 2025, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 922(o)(1)	possessed a machinegun

This criminal complaint is based upon these facts:

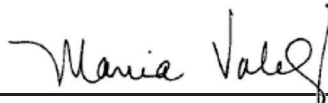
X Continued on the attached sheet.

MATTHEW HOYAS (Affiliate)
Digitally signed by MATTHEW HOYAS (Affiliate)
Date: 2025.07.30 12:23:20 -05'00'

MATTHEW HOYAS
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms & Explosives

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: July 30, 2025



Judge's signature

City and state: Chicago, Illinois

MARIA VALDEZ, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Matthew Hoyas, being duly sworn, state as follows:

I. AFFIANT'S BACKGROUND AND PURPOSE OF AFFIDAVIT

1. I am a Detective with the Chicago Police Department and a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have been employed as a CPD Detective for approximately 23 years and as an ATF Task Force Officer since approximately March 2024.

2. I am currently detailed to ATF's Crime Gun Intelligence Center (CGIC). The CGIC is a joint-force collaboration that brings together necessary resources and expertise to combat gun violence in the city of Chicago. The CGIC is the city of Chicago's central hub for Crime Gun Intelligence collection, analysis, and investigation. Using comprehensive and timely intelligence derived from the National Integrated Ballistic Identification Network, e-Trace, and ATF Analytics, the CGIC brings together partner agencies to identify, investigate, and prosecute prolific firearms offenders and their sources for crime guns.

3. As part of my duties, I investigate criminal violations relating to firearms, including, among others, possession of firearms by felons and possession of machineguns. As a CPD Detective, I have received extensive training pertaining to the investigation of various crimes including weapons offenses, aggravated batteries, murders, and other serious crimes against persons.

4. This affidavit is submitted in support of a criminal complaint alleging that EDDIE ARGUELLES possessed a machine gun, in violation of Title 18, United States Code, Section 922(o)(1) (the “**Subject Offense**”). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ARGUELLES with the **Subject Offense**, 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 ARGUELLES committed the **Subject Offense**.

5. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other law enforcement members and witnesses, my review of audio and video recordings, as well as open source and law enforcement databases.

II. **FACTS SUPPORTING PROBABLE CAUSE**

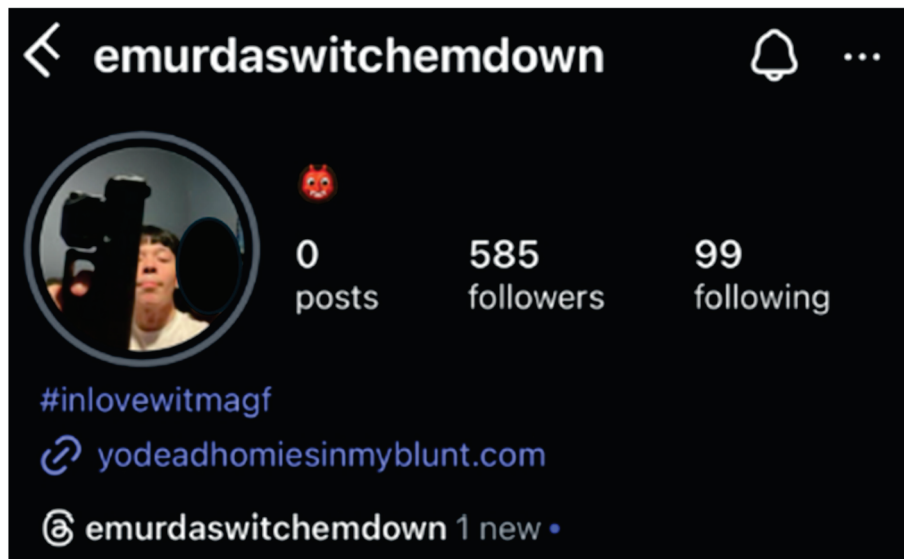
6. In summary and set forth more fully below, on May 14, 2025, EDDIE ARGUELLES was arrested by the Chicago Police Department in possession of a loaded black Glock 23 .40 caliber pistol equipped with an extended magazine, laser attachment, and a switch. A switch is a device that modifies a semi-automatic firearm to, with one pull of the trigger, a fully automatic machinegun.

7. According to Chicago Police Department reports, on May 14, 2025, officers responded to multiple reports of both shots fired and person with a gun at Riis Park, which is located on the west side of Chicago. One caller reported that a Hispanic male wearing all black and a ski mask on a scooter just fired a gun on the football field. When CPD officers responded to Riis Park, they saw an individual who

matched the description of the shooter, wearing all black with a ski mask standing next to a scooter, who was later identified as ARGUELLES. As CPD officers approached ARGUELLES in their car, ARGUELLES got on the scooter and began to flee from officers. ARGUELLES drove the scooter onto the football field, at which point he lost control of the scooter and fell on the ground. CPD officers got out of their car as ARGUELLES attempted to get back on the scooter and flee again. Officer Jadou tackled ARGUELLES and was able to secure ARGUELLES, but ARGUELLES continued to resist Officer Jadou by pulling away and stiffening his arms. ARGUELLES then tried to reach for his own leg. Officer Bone saw a large bulge in the same pantleg where ARGUELLES was reaching. Officers Jadou and Bone continued to struggle with ARGUELLES to attempt to place him in custody. Officers were eventually successful in doing so.

8. According to Chicago Police Department reports, Officer Bone recovered a firearm from ARGUELLES's pantleg, namely, a black Glock 23 .40 caliber pistol equipped with extended magazine, laser attachment, and a switch. The firearm was loaded with approximately 22 bullets and had an additional bullet in the chamber. Based on my training and experience, as well as the training and experience of other law enforcement agents with whom I have consulted, a switch is a device that modifies a semi-automatic firearm to, with one pull of the trigger, a fully automatic firearm. Law enforcement also located an expended shell casing on the ground near the location where several witnesses reported ARGUELLES had fired the gun.

9. According to an interview of Witness A, Witness A identified ARGUELLES's Instagram account name as "emurdaswitchemdown." A screenshot of the Instagram account profile is depicted below. Based on my review of ARGUELLES's booking photograph from May 14, 2025 and the emurdaswitchemdown Instagram account profile, the profile picture appears to show ARGUELLES holding a firearm with a switch alongside an unknown female (redacted in screenshot):



10. On or about July 2, 2025, Chief United States Magistrate Judge M. David Weisman authorized a warrant to search the Instagram Account "emurdaswitchemdown" for evidence of the **Subject Offense** for the period from on or about April 14, 2025, to on or about May 14, 2025.

11. Based on my review of the records that Meta provided pursuant to the search warrant, the Instagram account is registered to "EDDIE ARGUELLES." The Instagram account contains several photographs and videos of the user of the

account. I compared those photographs and videos with ARGUELLES's booking photograph from his May 14, 2025 arrest; based on that comparison, I believe that ARGUELLES is the individual depicted in the photographs and videos. One of the videos depicts an individual manipulating a firearm and stating something to the effect of, "This little piece right here is what's blocking the switch. Like they knew a mother fucker was trying to put that bitch in here. That mother fucker is supposed [to] slide all the way in." As the video appears to be shot from the perspective of the individual manipulating the firearm (screenshot below), the individual's face is not depicted in the video.



Based on my training and experience, as well as the training and experience of other law enforcement agents with whom I have consulted, the individual appears to be demonstrating how to install a switch onto the slide of the firearm as he makes the above-quoted observation.

12. On or about May 19, 2025, the CPD Crime Laboratory Division performed a function test of the Glock firearm with the switch. According to the CPD Crime Laboratory, the factory slide plate on the Glock firearm had been replaced with a switch, which can be converted to fire both as a semi-automatic (switch protruding to the right)—meaning one pull of the trigger expels one bullet—and as a fully automatic (switch protruding to the left) —meaning one pull of the trigger expels bullets continuously. When it was test fired, CPD determined that the firearm fired full-automatic only.

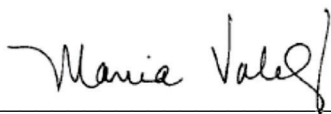
III. CONCLUSION

13. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on May 14, 2025, ARGUELLES possessed a machinegun, in violation of Title 18, United States Code, Section 922(o)(1).

MATTHEW
HOYAS (Affiliate)
Digitally signed by MATTHEW
HOYAS (Affiliate)
Date: 2025.07.30 12:22:55
-05'00'

MATTHEW HOYAS
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

SWORN TO AND AFFIRMED by telephone July 30, 2025.



Honorable Maria Valdez
United States Magistrate Judge