

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JUAN ESPINOZA MARTINEZ

CASE NUMBER:
UNDER SEAL

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 3, 2025, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

Code Section

Title 18, United States Code, Section
1958(a)

Offense Description

murder for hire

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Christopher Perugini

CHRISTOPHER PERUGINI

Special Agent, Homeland Security Investigations
(HSI)

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 1:09 p.m.

Heather K. McShain

Judge's signature

City and state: Chicago, Illinois

HEATHER K. MCSHAIN, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CHRISTOPHER PERUGINI, being duly sworn, state as follows:

1. I am a Special Agent with the Homeland Security Investigations (HSI) and have been so employed for approximately 5 years. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that Juan ESPINOZA MARTINEZ has violated Title 18, United States Code, Section 1958(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ESPINOZA MARTINEZ with murder for hire, 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 my review of reports and documents related to this investigation, conversations with others who have knowledge of the events and circumstances described in this affidavit, my review of law enforcement databases, my own training and experience and the training and experience of other

agents with whom I work, information provided to me by other law enforcement officers, and from persons with knowledge regarding relevant facts.

I. FACTS ESTABLISHING PROBABLE CAUSE

4. In summary and as detailed further below, by no later than October 3, 2025, ESPINOZA MARTINEZ, has offered, on behalf of the street gang known as the Latin Kings in Chicago, Illinois, to other members of the Latin Kings and others, a \$2,000 reward for information related to Victim A and a \$10,000 reward for the murder of Victim A.

5. Based on law enforcement records, Victim A is currently a senior law enforcement member of the Border Patrol Operation “Midway Blitz” in Chicago Illinois.

6. Based on my training and experience, the Latin Kings is a Chicago based street gang whose criminal activity includes, narcotics trafficking, extortion, murder, assault, firearms trafficking, armed robbery, kidnapping, burglary, money laundering, racketeering, and intimidation.

7. Based on my training and experience, the Latin Kings gang has historically been known to order “hits” (*i.e.*, murders) of law enforcement, rival gang members, and members who fail to follow orders.

8. According to a Source of Information (SOI-1)¹, ESPINOZA MARTINEZ is a ranking member of the Latin Kings. For example, according to SOI-1, after a

¹ SOI-1 currently has legal status in the United States. There are no pending charges or investigations related to SOI-1. SOI-1 has a prior felony conviction for a violent offense. Certain information provided by SOI-1 has been corroborated through law enforcement’s

police-involved shooting on October 4, 2025 involving the United States Border Patrol in the Brighton Park neighborhood of Chicago, Illinois, ESPINOZA MARTINEZ informed SOI-1 that he had dispatched members of the Latin Kings to the area of the 39th and Kedzie in Chicago, Illinois in response to the shooting. SOI-1 further stated that ESPINOZA MARTINEZ informed SOI-1 that ESPINOZA MARTINEZ had instructed Latin Kings members to acquire firearms and hang out in the area of 26th Street and South Drake Avenue in Chicago, Illinois, to protect Latin Kings territory in this vicinity. Based on my training and experience and knowledge of this investigation, I believe that ESPINOZA MARTINEZ is a high-ranking member of the Latin Kings and has authority to order other members to carry out violent acts, including murder.

9. As part of SOI-1 reporting about ESPINOZA MARTINEZ, on or about October 4, 2025, SOI-1 further provided a photograph of a screenshot to law enforcement that SOI-1 reported ESPINOZA MARTINEZ had sent to SOI-1, which reflected the name “Juan” in the top left corner and contained a conversation between ESPINOZA MARTINEZ and another unknown individual wherein ESPINOZA MARTINEZ tells the other unknown individual “bro we need some ppl pu gw out here,” and “lets get some guys here bro,” and the other unknown individual responds, in part, “Let one of us be infront with the [green gun emoji].” Based on my training and experience and information provided by SOI-1, I believe ESPINOZA

investigation and review of other materials, such as telephone records and social media posts. To date, SOI-1 has not been paid for any information provided to law enforcement. SOI-1 may be assisting law enforcement in the hopes of future payment.

MARTINEZ's conversation with this unknown individual, in particular where ESPINOZA MARTINEZ states, "we need some ppl pu gw out here," indicates ESPINOZA MARTINEZ was instructing the other unknown individual to pick up and bring guns. And further, based on my training and experience and information provided by SOI-1, I believe the other unknown individual's response that, "Let one of us be infront with the [green gun emoji]," indicates that this other unknown individual was a member or associate of the Latin Kings and was suggesting that a member or associate of the Latin Kings be in front.

10. SOI-1 further reported that ESPINOZA MARTINEZ goes by the street name "Monkey" and uses the phone number (312) ***-7040.

11. According to subscriber records, telephone number (312) ***-7040 is registered to Individual A on the 2600 block of South Drake Avenue, in Chicago, Illinois. Based on law enforcement databases and immigration records, ESPINOZA MARTINEZ and Individual A are associates who have shared prior addresses. According to publicly available information, phone number (312) ***-7040 is associated with the CashApp account username "\$Monkey2***."

12. Based on law enforcement surveillance, on or about October 4, 2025, a person matching ESPINOZA MARTINEZ's appearance (matching ESPINOZA MARTINEZ's appearance from a photograph obtained from an immigration database, the same photograph of ESPINOZA MARTINEZ referred to below in para. 13) and at times driving a red 2014 Ford pickup truck registered to ESPINOZA MARTINEZ (according to vehicle registration records), was observed in the area of the 2400 block of South Drake Avenue in Chicago, Illinois and in the area of the 2600

block of South Drake Avenue in Chicago, Illinois, all of which, based on my training and experience, is known to be Latin Kings territory in Chicago, Illinois.

13. On or about October 5, 2025, law enforcement showed a photograph of ESPINOZA MARTINEZ obtained from an immigration database without any identifying marks to SOI-1, who confirmed the person pictured was the individual SOI-1 knows as Juan ESPINOZA MARTINEZ.

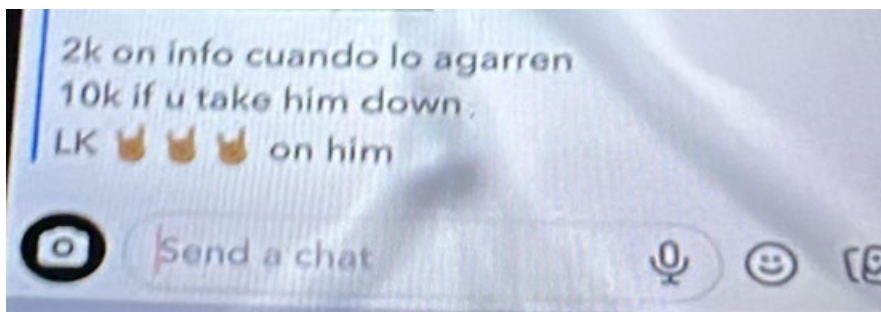
14. On or about October 4, 2025, SOI-1 provided a screenshot of ESPINOZA MARTINEZ's Snapchat username and profile, which reflected the name "Juan" and further identifying name "monkey****," pictured below:



15. Based on my training and experience and knowledge of this investigation, I believe information provided by SOI-1 regarding ESPINOZA MARTINEZ's Latin Kings association, phone number, and street name are true and correct.

16. On October 3, 2025, prior to the aforementioned reports by SOI-1 to law enforcement on October 4, 2025, SOI-1 reported to law enforcement that that ESPINOZA MARTINEZ, on behalf of the Latin Kings, had solicited members of the Latin Kings and others to harm or murder Victim A. Specifically, according to SOI-

1, ESPINOZA MARTINEZ sent a picture of a senior law enforcement member of the Border Patrol Operation “Midway Blitz,” followed by the below message, to SOI-1 via Snapchat:



17. Based on my review of the above screenshot provided by SOI-1, the full screenshot showed the named “Juan,” in the top left corner, indicating it was a Snapchat message SOI-1 received from ESPINOZA MARTINEZ.

18. Based on publicly available information, my knowledge of this investigation, information provided by SOI-1, and my training and experience, I believe that the photograph included in the Snapchat messages sent by ESPINOZA MARTINEZ to SOI-1 depicts Victim A.

19. Further, based on translations provided by other law enforcement, the Spanish-written sentence “2k on info cuando lo agarren,” translates to “\$2,000 on information when you get him.” Based on my knowledge of this investigation, information provided by SOI-1, and my training and experience, ESPINOZA MARTINEZ’s communications to SOI-1 via Snapchat essentially related that had offered, on behalf of the Latin Kings in Chicago, Illinois, to other members of the

Latin Kings and others, a \$2,000 reward for information related to Victim A and a \$10,000 reward for the murder of Victim A.

20. Further, based on my training and experience and knowledge of this investigation, the sentence ESPINOZA MARTINEZ sent SOI-1 via Snapchat that read, “LK [with emojis] on him,” meant that the Latin Kings were involved in the request for the murder of Victim A.

21. Based on my training and experience and knowledge of this investigation, I believe that ESPINOZA MARTINEZ, has offered, on behalf of the Latin Kings in Chicago, Illinois, to other members of the Latin Kings and others, a \$2,000 reward for information related to Victim A and a \$10,000 reward for the murder of Victim A.

22. Based on my training and experience and knowledge of this investigation, Snapchat, when used in or around Chicago, Illinois, is a facility of interstate of interstate commerce, because Snapchat’s servers are located outside of Illinois.

FURTHER AFFIANT SAYETH NOT.

Christopher Perugini

CHRISTOPHER PERUGINI

Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone October 5, 2025.

Heather K. McShain

Honorable HEATHER K. MCSHAIN
United States Magistrate Judge