

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOSE MEDINA-MEDINA,
also known as "Jose Gregorio Medina,"
Jose Gregorio Medina-Medina,
and "Jose Medina"

CASE NUMBER: 26 CR 145

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 March 20, 2026, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section
922(g)(5)

Offense Description

knowing that he was an alien, illegally or unlawfully in the United States, knowingly possessed a firearm, namely, a Smith & Wesson, Model SW40VE, 40 caliber pistol, bearing serial number RBE4705, which firearm had traveled in interstate commerce prior to the defendant's possession of the firearm.

This criminal complaint is based upon these facts:

Continued on the attached sheet.

Brendan Mulvey

BRENDAN MULVEY

Special Agent

Bureau of Alcohol, Tobacco, Firearms &
Explosives (ATF)

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: April 2, 2026

Young B. Kim

Judge's signature

City and state: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, BRENDAN MULVEY, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives and have been employed since June 2018.
2. I am currently assigned to the Crime Gun Intelligence Center of Chicago (CGIC). The CGIC is a multi-agency, joint-force collaboration to identify, investigate and prosecute prolific firearms offenders and their sources of crime guns. As part of my duties as a Special Agent at the CGIC, I investigate violent crimes, criminal violations relating to firearms, and firearms trafficking. My current responsibilities also include the investigation of violent gun crimes and the apprehension of violent fugitives.
3. I have participated in numerous investigations that involve the illegal purchase, trafficking, possession, and use of firearms and ammunition during, and in relation to, crimes of violence. I have received training in the area of firearms investigations, and I have participated in multiple investigations involving violations of federal firearms laws. I have recovered and examined different types of firearms and ammunition and am familiar with the appearance and characteristics of the make and model of multiple types of firearms. I have participated in the execution of multiple federal search warrants.

4. This affidavit is submitted in support of a criminal complaint alleging that defendant Jose MEDINA-MEDINA, also known as “Jose Gregorio Medina,” “Jose Gregorio Medina-Medina,” and “Jose Medina,” has violated Title 18, United States Code, Section 922(g)(5). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging defendant with unlawful possession of a firearm by an alien illegally or unlawfully in the United States, 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.

5. This affidavit is based on my personal knowledge and involvement in this investigation; information provided to me by other law enforcement agents involved in this investigation; my review of law enforcement records, my training and experience, and the training and experience of other law enforcement agents with whom I have consulted.

6. According to Circuit Court of Cook County, Illinois records, defendant is currently charged with murder, attempted murder, three counts of aggravated discharge of a firearm and aggravated unlawful possession of a weapon in the Circuit Court of Cook County, Illinois, in *People v. Jose G Medina*, case number 26-110549801. Because I have been assigned to only investigate defendant’s unlawful possession of a firearm by an alien illegally or unlawfully in the United States, I have not reviewed, at this juncture, all of the reports and evidence obtained, and continuing to be obtained, in relation to the state prosecution of defendant in Cook

County case number 26-110549801, as such materials are outside the scope of this limited investigation.

I. POSSESSION OF FIREARM

7. According to Chicago Police Department Reports and publicly available information, defendant was arrested by the Chicago Police Department on or about March 20, 2026, in connection with the homicide of Victim A, that occurred on or about March 19, 2026, at or about the location of 1054 West Pratt Boulevard, Chicago, Illinois.

8. According to the incident narrative in a Chicago Police Arrest Report regarding the investigation of the above-described incident:

a. “Witnesses related that a male in black clothing, wearing a black mask, pointed a handgun at the victim and fired one round at her, fatally striking her in the back as she attempted to flee. The witnesses then observed the offender walking westbound with a very distinct and slow gait. Audio recordings recovered from the scene captured a single gunshot at approximately 01:06 hours. At approximately 01:12 hours, video recordings captured a male in black clothing, wearing a black mask, walking with a distinct limp and slow gait from the location of occurrence to Pratt Blvd, westbound. A few minutes later, this subject is captured on video walking northbound through the east alley of Sheridan Rd. and entering the rear of [XXX]5 N. Sheridan Rd. He is then captured on the building's interior lobby video unmasked, waiting for the elevator and holding a mask in his hand.”

b. “The [witness], who was assisting with video recovery, related that he knew the subject to be a male Hispanic who lived in apartment [XXX] and who had a very distinct limp and gait. Two other witnesses later viewed still photos of the subject walking away from the beach and identified him as the offender who shot and killed [Victim A]. Images of the offender were sent to CPIC for facial recognition and U.S. Customs & Border Protection returned matching candidate Jose Gregorio Medina Medina (FBI# [___], IR#[___].) The [witness] subsequently viewed Medina's CB# [_____] photograph,

obtained through Data Warehouse and identified him as the subject who lives in apartment [XXX] and was captured on the lobby video.”

c. “A residential Search Warrant was drafted for [XXX]5 N. Sheridan Rd, apt. [XXX]. The [XXXX] team assisted with the execution of this warrant, 26SW[XXXXXX], at which time Medina was located within the apartment and placed under arrest.”

9. According to a Chicago Police Search Warrant Data report that references Chicago Police Inventory Reports from the execution of the residential search warrant described above, the Chicago Police Department located a Smith and Wesson, SW40VE, .40 caliber semi-automatic pistol, serial number RBE4705 (“recovered firearm”), inside in the above described apartment during the search. The report also indicates that mail bearing defendant’s name was also located in the residence.

10. According to an ATF National Integrated Ballistics Information Network (“NIBIN”)¹ Enforcement Support System (NESS) report, an expended .40 caliber casing was located at 1054 West Pratt Boulevard, Chicago, Illinois on March 19, 2026. Both the cartridge casing recovered at the scene of the March 19, 2026 homicide and a cartridge casing from a test fire of the firearm recovered from [XXX]5 N. Sheridan Road, Apartment #[XXX], Chicago, Illinois, were entered into the NIBIN. A trained NIBIN technician then reviewed the digital images which were peer reviewed to determine whether there are potential leads or associations from the same firearm. In this case, the NESS and NIBIN lead reports show a presumptive

¹ NIBIN, in summary, is a national ATF network that allows for the capture and comparison of ballistic evidence to aid in solving violent crimes.

lead that the cartridge casing from the test fire and the cartridge casing recovered from the scene of the crime were both fired from the recovered firearm.

II. INTERSTATE NEXUS

11. Based on my training and experience, I have become familiar the ATF eTrace system which is, in summary, an ATF-administered system that enables law enforcement agencies to retrieve detailed tracing information associated to firearms identified during law enforcement investigations.

12. As part of this investigation, a trace of the recovered firearm was performed utilizing the ATF eTrace system in an effort to identify original purchaser information. Tracing data indicated the firearm to have been originally purchased on or about February 6, 2008, from a Federal Firearms Licensee located in Montgomery, Alabama.

13. As part of this investigation, an ATF Special Agent and certified Interstate Nexus Expert reviewed photographs of the recovered firearm and conducted research regarding its origin and made a preliminary determination that the firearm was manufactured/assembled outside the state of Illinois.

14. Accordingly, the ATF Special Agent and certified Interstate Nexus Expert preliminarily determined that the recovered firearm had traveled in interstate commerce prior to the defendant's possession of the firearm on or about March 20, 2026.

III. ALIEN ILLEGALLY OR UNLAWFULLY IN THE UNITED STATES

15. The undersigned obtained and reviewed certain immigration related records for defendant maintained by the Department of Homeland Security, U.S.

Citizenship and Immigration Services (“CIS”) and the National Archives and Records Administration, including the Alien File (“A-File”)² for defendant and additional information contained in CIS databases.

16. The records and databases reviewed by the undersigned at this time reflect that defendant was born in Venezuela and is a citizen of that country by virtue of birth with no lawful status in the United States.

17. A Form I-213 (Record of Deportable/Inadmissible Alien) contained within the A-File reflects, in summary, that, on or about May 9, 2023, a Border Patrol Agent encountered defendant in the El Paso Border Sector area and determined that defendant had unlawfully entered the United States from Mexico and was an undocumented migrant. The form also reflects defendant was unable to provide a valid United States address or verifiable point of contact, but stated that he intended to reside in New Rochelle, New York.

18. The A-File also contained a Notice of Custody Determination. The notice reflects, in summary, that defendant was released from custody on his own recognizance on or about May 24, 2024 at 18:14 (6:14 p.m.) and that the contents of the notice were read to defendant in Spanish.


19. A Notice to Appear contained with the A-File, dated May 23, 2023, provides that defendant was an alien present in the United States without being

² According to the CIS website <https://www.uscis.gov/records/genealogy/historical-record-series/a-files-numbered-below-8-million>: “Alien Files, or ‘A-Files,’ are individual files identified by subject's Alien Registration Number (‘A-Number’). An A-Number is a unique personal identifier assigned to an alien. A-Files became the official file for all immigration and naturalization records created or consolidated since April 1, 1944.”


admitted or paroled into the United States. The notice, in summary, also required defendant to appear for a hearing before an immigration judge in New York on October 13, 2023 at 9:00 a.m. A certification of service attached to the notice reflects that defendant was provided oral notice in Spanish of the time and place of his [] [] hearing and of the consequences of failure to appear. The certification of service also contains what appears to be a handwritten signature or initial over the inscription “signature of respondent if Personally Serviced.” At this time, there is no indication of any record of any further immigration related proceedings or adjustment in status following the issuance of that notice.

20. In connection with his entry without permission into the United States, the A-File contained a photograph of defendant from on or about May 2023. I have reviewed this May 2023 photograph of defendant and compared this to a recent publicly available March 2026 photo of defendant from the Cook County Department of Corrections and determined that these photos are of the same person, namely, defendant.

FURTHER AFFIANT SAYETH NOT.


BREN DAN MULVEY
Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

SWORN TO AND AFFIRMED by telephone April 2, 2026.


Honorable YOUNG B. KIM
United States Magistrate Judge