

FILED

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Jonathan L. Shih (312) 353-5361

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ALEXANDER MARTINEZ-QUIROZ

CASE NUMBER: 26 CR 161

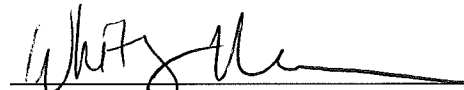
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. From on or about December 14, 2025 to on or about April 9, 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)(1)*Offense Description*

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, firearms, namely, a Great Lakes Firearms & Ammo LLC GL-15 multi caliber rifle with serial number 4.2550, and a Glock Model 19 firearm bearing serial number BFKF135, which firearms had traveled in interstate and foreign commerce prior to defendant's possession of the firearms

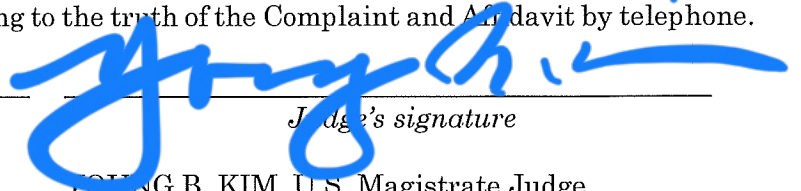
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

WHITLEY NORRIS

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: April 9, 2026City and state: Chicago, Illinois

Judge's signature

YOUNG B. KIM, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, WHITLEY NORRIS, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately June 2022.

2. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to narcotics and firearms. I have received training in the area of narcotics investigations and firearms investigations, and I have participated in the execution of multiple federal search warrants.

3. This affidavit is submitted in support of a criminal complaint alleging that Alexander Martinez-Quiroz has violated Title 18, United States Code, Section 922(g)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging MARTINEZ-QUIROZ with felon in possession of a firearm, 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.

4. The statements in this affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not

included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to establish probable cause to believe that Alexander MARTINEZ-QUIROS (“MARTINEZ”) has violated Title 18, United States Code, Section 922(g)(1) (the “Subject Offenses”).

Background

5. FBI is currently conducting an investigation of MARTINEZ. As described in more detail below, the investigation has revealed that MARTINEZ is a member of the street gang based in Chicago.

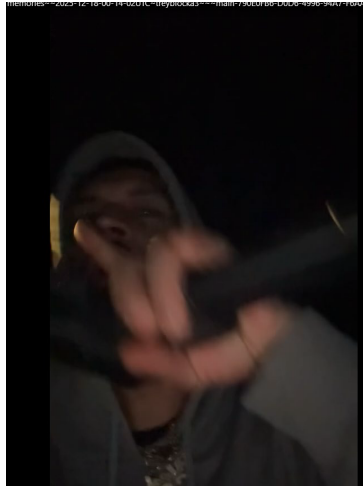
6. I have reviewed MARTINEZ’s criminal history and learned that on November 30, 2009, he was convicted of aggravated unlawful use of a weapon, in the Circuit Court of Cook County, which is punishable by more than 1 year of imprisonment under Illinois state law. On October 21, 2010, MARTINEZ was convicted of burglary, in the Circuit Court of Cook County, which is punishable by more than 1 year of imprisonment. Additionally, on October 22, 2013, MARTINEZ was convicted of possession of a controlled substance, in the Circuit Court of Cook county, which is punishable by more than 1 year of imprisonment under Illinois state law. Therefore, I believe that MARTINEZ is prohibited from possessing firearms.

Account 1

7. On March 17, 2026, the Hon. Keri L. Holleb Hotaling, United States Magistrate Judge, signed search warrant 26 M 160, which authorized a search of a particular Snapchat account (“Account 1”) for evidence of the Subject Offenses, including evidence related to firearms and the Two Six street gang.

8. I have reviewed records from Account 1, provided by Snap, Inc. Those records reveal that Account 1 is registered to “Alexander Martinez,” with a date of birth that is consistent with MARTINEZ’s date of birth as listed with the Illinois Secretary of State. Additionally, the data associated with Account 1 included multiple videos stored as “memories,” or videos sent to other Snapchat users. Multiple of those videos were selfie-style videos, which included the face of the person who was recording the video. I have compared those videos with a booking photograph of MARTINEZ provided by the Chicago Police Department, and I identified the individual in the videos as MARTINEZ.

9. I have also reviewed multiple videos that show MARTINEZ in possession of firearms. For instance, in a video dated December 18, 2025, MARTINEZ was shown in possession of a firearm while driving, and the interior of the vehicle is consistent with a Ford F-150. During the video, MARTINEZ made multiple statements, including, ““I don’t give a fuck n****, I’ll die today, I don’t give a fuck, n****. Somebody’s dying today though, n****. I promise you that n****. Rest in peace my n****, Lechuga. Saint killer, n****. If I don’t drop a Saint, I’ll drop a donut for real, n****, I promise you that n****. Fuck everybody, n****. Crash out gang, for real.” At one point in the video he turned the camera to show he was at an intersection on 46th Street in Chicago. A screenshot from the video showing MARTINEZ’s face as well as the firearm is below.



10. Based on my training and experience, I know area of 46th Street in Chicago is within the territory of the Latin Saint street gang. I believe that in the video, when MARTINEZ mentioned a “Saint,” he was referencing this gang. Additionally, when MARTINEZ referenced a “donut”, I believe he was referencing a member of the Satan Disciples street gang. “Donut” is a street term rival gang members use to refer to Satan Disciples. In this recording, I believe that MARTINEZ was looking for Saint members to shoot in retaliation of the killing of “Lechuga,” and if MARTINEZ was unable to locate a Saint, that he would shoot a member of the Satan Disciples.

11. In another video, also dated December 18, 2025, and which was time stamped minutes after the previously-described video, MARTINEZ appeared to be in the parking lot of a Taco Bell restaurant. MARTINEZ then got out the driver’s seat of a vehicle holding a firearm to his chest. In the video, MARTINEZ made several statements, including “Lechuga,” before saying, “47th street. I’m gonna pack you n***** up.” According to my training and experience, I believe MARTINEZ was continuing to threaten violence to Latin Saint gang members whose territory includes

47th street in retaliation for actions taken against MARTINEZ's associate, "Lechuga."

12. Based on my review of landmarks surrounding the Taco Bell visible in the video, I believe that the video was taken in the parking lot of the Taco Bell restaurant at 4614 S. Damen Street, Chicago, Illinois, which is inside Latin Saint territory. Additionally, the vehicle depicted in the video is consistent with a blue Ford F-150. Records from the Illinois Secretary of State show that MARTINEZ has registered a particular Ford F-150 with the Illinois Secretary of State ("MARTINEZ's Vehicle").

13. Additionally, I believe that the reference in this and the prior video to "Lechuga" referred to the murder of Lewis Lechuga on January 30, 2023. Based on information provided to me by the Chicago Police Department, I know that Lechuga was shot and killed in this same Taco Bell parking lot, and that Lechuga was a suspected Two Six gang member.

14. In another video, dated December 18, 2025, approximately 10 minutes after the video taken at the Taco Bell, MARTINEZ was depicted walking down a street holding a firearm in one hand and taking the video with his other hand. During the video, MARTINEZ stated, "Where the Saints today, though?" as he looked around. Additionally, MARTINEZ panned the camera around to show a residential intersection. A screenshot from the video is below.



15. I believe, based on my training and experience, that MARTINEZ was again threatening to commit violence toward members of the Latin Saints.

16. In a video dated December 18, 2025, approximately 30 minutes after the previous video, MARTINEZ appeared to be recording inside a vehicle. He said to the camera, “Hold on, this shit is gonna be funny.” He then exited out of the vehicle and was standing in front of a brick building. He then said, “What am I, n****? Yeah, I’m a gangster Two-Six, n****. What’s up?” He then raised his left hand into the air and fired a handgun three times. MARTINEZ then said, “Exactly, n****. Y’all n****s ain’t on shit!” According to my training and experience, I believe “I’m a gangster Two-Six” refers to MARTINEZ claiming membership in the Two-Six street gang. A screenshot of the video showing MARTINEZ firing the gun is below.

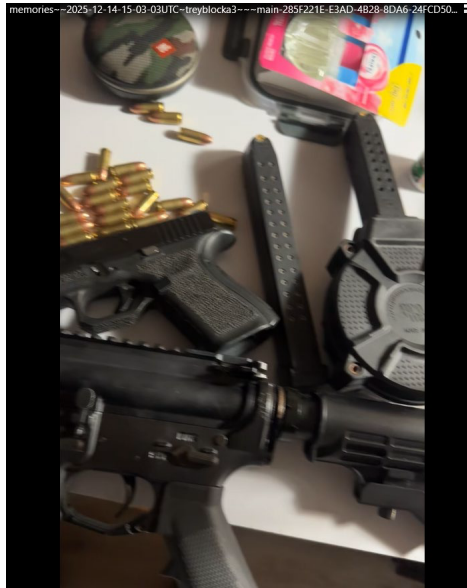


17. A video dated December 14, 2025, depicted a table with a rifle, Glock-style handgun, a rifle magazine, a handgun with an extended magazine, and a handgun drum-style extended magazine, with various ammunition laying on the table. The person recording is depicted handling the weapons, while saying “gotta reload these bitches, fuck.” In the video, the rifle’s serial number is visible and appears to be 4.2550.¹ A search of records at the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) showed that the rifle was a Great Lakes Firearms & Ammo, LLC GL-15 multi caliber rifle with serial number 4.2550. Further, records from the ATF showed that this firearm was stolen from a shipment originating from Great Lakes Firearms & Ammunition LLC in Michigan to a company in Iowa.

18. Further, geolocation information provided by Snapchat during the approximate time of the video showed that the user of Account 1 was located in the

¹ The image is somewhat blurry, and the serial number could have potentially been 4.2660. However, as described below, the firearm was seized on April 9, 2026, and therefore, I believe that the firearm in the video has the serial number 4.2550.

vicinity of a particular residence in Chicago, Illinois (“MARTINEZ’s Residence”). Therefore, I believe that the video was taken inside MARTINEZ’s Residence. A screenshot of the video is below.



MARTINEZ’s Residence and April 9, 2026 Search Warrants

19. I have reviewed geolocation data provided by Snapchat associated with Account 1, which showed that Account 1 was regularly located in the vicinity of the MARTINEZ’s Residence, including as recently as March 2026.

20. Additionally, information provided by the Illinois Secretary of State showed that MARTINEZ resides at MARTINEZ’s Residence.

21. On April 3, 2026, member of the FBI conducted surveillance in the vicinity of the MARTINEZ’s Residence. On that day, FBI observed MARTINEZ park MARTINEZ’s Vehicle in the vicinity of the MARTINEZ’s Residence, walk toward the building, and use a key to access the building of the MARTINEZ’s Residence.

Additionally, agents have observed MARTINEZ's Vehicle parked near the MARTINEZ's Residence while conducting surveillance in that area.

22. On April 8, 2026, the Hon. Young B. Kim, United States Magistrate Judge, signed search warrants 26 M 234, 235 and 236, which authorized searches of MARTINEZ's Residence, the person of MARTINEZ and MARTINEZ's Vehicle.

23. On April 9, 2026, members of law enforcement conducted surveillance at MARTINEZ's Residence. Law enforcement observed MARTINEZ driving away from the area of MARTINEZ's Residence in MARTINEZ's Vehicle and conducted a vehicle stop. Subsequently, agents obtained keys for MARTINEZ's Residence from MARTINEZ.

24. Utilizing the keys, agents entered MARTINEZ's Residence pursuant to the above-described search warrants. During the search, agents recovered, among other things, one Great Lakes Firearms & Ammo LLC GL-15 multi caliber rifle bearing serial number 4.2550, which was loaded; one Glock Model 19 firearm bearing serial number BFKF135, which had a drum-style magazine and was loaded; multiple rounds of ammunition; a firearms case for a Springfield XD firearm, which contained a loaded handgun magazine; and one extended magazine with an unknown number of rounds.

25. Agents also located evidence of occupancy of MARTINEZ's Residence, including identification cards bearing MARTINEZ's name and information. Additionally, agents located the camouflage item that appears in the video posted on December 14, 2025.

26. The rifle and Glock-style firearm are consistent in appearance with firearms that appeared in videos in Account 1. I know, based on my training and experience, that neither Great Lakes Firearms & Ammo LLC and Glock manufacture firearms in the State of Illinois, and therefore, that the firearms had traveled in interstate or foreign commerce prior to April 9, 2026.

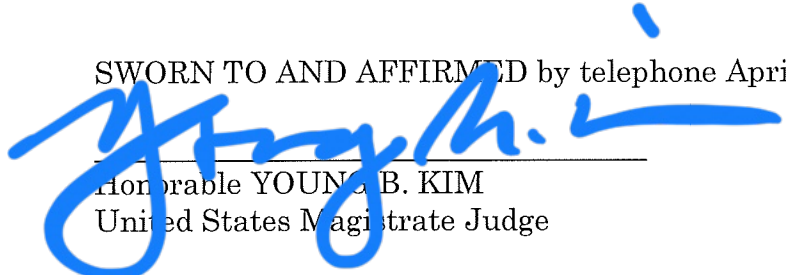
FURTHER AFFIANT SAYETH NOT.



WHITLEY NORRIS

Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone April 9, 2026.



Honorable YOUNG B. KIM

United States Magistrate Judge