

SEALED

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

October 11, 2025

KAREN MITCHELL

CLERK, U.S. DISTRICT
COURT

United States of America

v.

Eduardo Aguilar

Case No.

3:25-MJ-1020-BT

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 October 9 to October 11, 2025 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. 875(c)

Offense Description

Transmitting a Threat in Interstate Commerce

This criminal complaint is based on these facts:

See attached Affidavit SA [REDACTED]

☒ Continued on the attached sheet.

[REDACTED]
Complainant's signature

[REDACTED] Special Agent, FBI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: 10/11/2025

City and state: Dallas, Texas

[REDACTED]
Judge's signature

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

EDUARDO AGUILAR

3:25-MJ-1020-BT

Filed Under Seal

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I [REDACTED] being first duly sworn, hereby depose and state as follows:

Introduction

1. I make this affidavit in support of a criminal complaint charging Eduardo Aguilar with Transmitting a Threatening Communication in Interstate Commerce in violation of 18 U.S.C. § 875(c).

Agent Background

2. I am a Special Agent with the Federal Bureau of Investigation and have been since [REDACTED]. I am currently assigned to the Dallas Division, where I serve on the North Texas Joint Terrorism Task Force ("NTJTTF"). In this capacity, I am responsible for investigating domestic terrorism cases, including, but not limited to, weapons of mass destruction violations, racially motivated acts of violence, and militia/anti-government extremists. I have received training in, among other areas, domestic and international terrorism, to include extremist tactics, techniques, and procedures. I have experience in the review of evidence obtained during the execution of these search warrants.

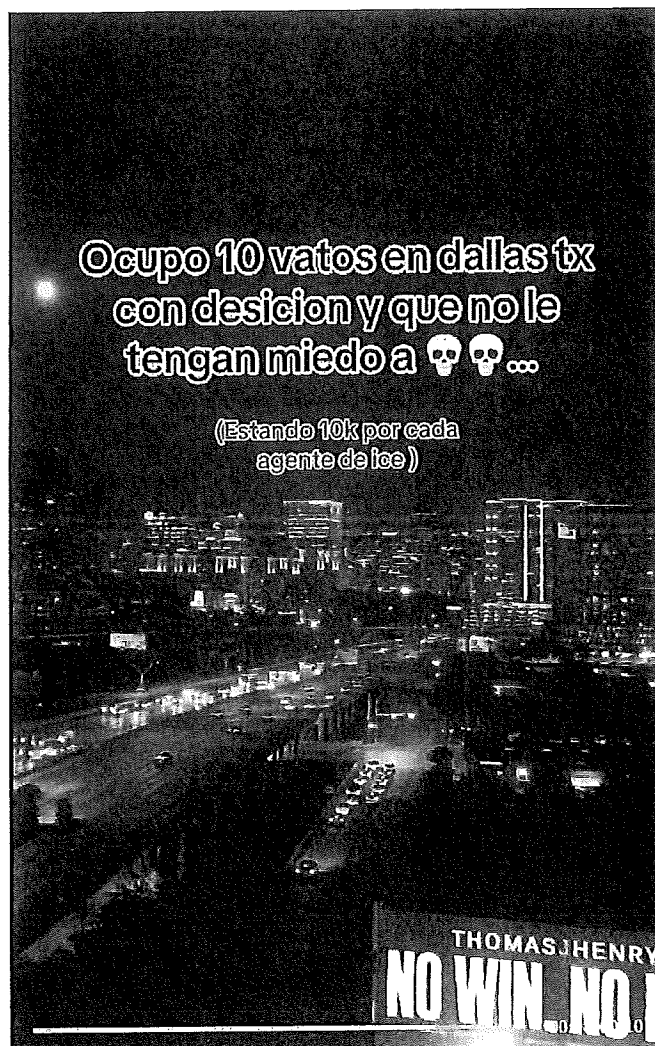
3. The information contained in this affidavit is based on, among other things, my personal knowledge and observations during the course of this investigation, my training and experience, information provided to me by other law enforcement agencies, and my review of information obtained during the investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Applicable Law

4. Pursuant to 18 U.S.C. § 875(c), “[w]hoever transmits in interstate or foreign commerce any communication containing any threat ... any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.”

Probable Cause

5. On October 10, 2025, the FBI received information from the Dallas Police Department regarding a TikTok post soliciting individuals to murder ICE agents. The post, which is in Spanish and was made on October 9, 2025, is pictured below:



6.

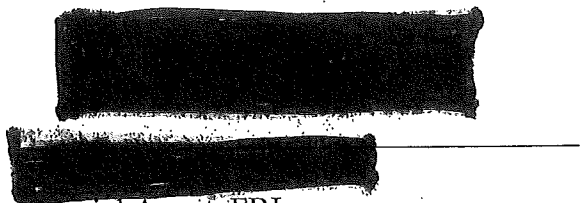
7. The post was reviewed by an FBI certified Spanish Speaker, who translated the text. The first phrase, in black and white text, states: "I need 10 dudes in Dallas with determination (guts) who aren't afraid to [two skull emojis]. My understanding of the two skull emojis is that they are meant to represent the word "die." The second phrase, in red and white text, states: "10K for each ICE agent." I recognize the photograph in the background to be a photograph of Dallas, Texas. I understand this post to be one that is offering cash to kill Immigration and Customs Enforcement Agents.

8. This post was made from the TikTok account assigned to username "Eduardo.Aguilar004." Emergency process was issued to TikTok for information regarding the account. In response, TikTok provided a Dallas based phone number and a Google email account associated with the account. Additional emergency process was issued to Verizon Wireless, initially believed to be the carrier supporting the Dallas-based phone number. That process returned a third-party provider, Charter Communications. Emergency process issued to Charter Communications associated the account with the name and address of Eduardo Aguilar, date of birth [REDACTED]

9. I know, based on my training and experience, that the TikTok application transmits posts throughout the country via the Internet, in and affecting interstate commerce. I also know, based on the investigation, that this threat was transmitted, as it was publicly available and viewable from Eduardo Aguilar's profile.

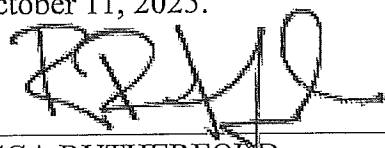
10. Based on the foregoing, I submit there is probable cause to believe that, from on or about October 9, 2025 through on or about October 11, 2025, Eduardo Aguilar knowingly transmitted in interstate and foreign commerce a threatening statement containing a threat to injure the person of another, namely, ICE agents, for the purpose of issuing a threat, with knowledge that the communication would be viewed as a threat, and with conscious disregard of a substantial risk that the communication would be viewed as a threat, in violation of 18 U.S.C. § 875(c).

Respectfully submitted,



Special Agent, FBI

Agent sworn and signature confirmed via reliable electronic means, pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure on October 11, 2025.



REBECCA RUTHERFORD
UNITED STATES MAGISTRATE JUDGE