

FILED

June 23, 2025

UNITED STATES DISTRICT COURT

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

for the

Western District of Texas

BY: AB

DEPUTY

United States of America

v.

Jaime Albert QUINTANILLA-Chavez

Case No. **SA:25-MJ-947**

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 June 20, 2025 in the county of Bexar in the Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

18/111(a)(1)(b)

Assaulting, Resisting, or Impeding Certain Officers or Employees

PENALTIES:

20 years imprisonment, \$250,000 fine, 3 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

Continued on the attached sheet.

STEVEN FUENTES Digitally signed by STEVEN FUENTES
Date: 2025.06.20 15:10:14 -05'00'

Complainant's signature

Steven Fuentes, HSI, SA

Printed name and title

- Sworn to before me and signed in my presence.
- Sworn to telephonically and signed electronically.

Date: June 23, 2025

City and state: San Antonio, Texas



Judge's signature

Richard B. Farrer, US Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Steven Fuentes, a Special Agent with Homeland Security Investigations, being duly sworn, depose and state as follows:

1. I am a Special Agent (SA) employed by the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), and I have been so employed since November 2008. Prior to becoming a Special Agent with HSI, I was employed by ICE Enforcement and Removal Operations (ERO) as an Immigration Enforcement Agent in Los Fresnos, Texas, and had been so employed since September 2007. Prior to ICE ERO, I was employed by the United States Border Patrol (USBP) as a Border Patrol Agent (BPA) beginning in July of 2005. To date I have over 19 years of law enforcement experience.

2. On June 20, 2025, Homeland Security Investigations (HSI), ICE Enforcement and Removal Operations (ICE-ERO), and Texas Department of Public Safety (TxDPS) were conducting surveillance at a residence on Benrus, in San Antonio, Texas, in the Western District of Texas. Database checks indicated that **Jaime Albert QUINTANILLA-Chavez**, with a Final Order of Removal from an Immigration Judge, was residing at the above address. At approximately 0715 a.m., **QUINTANILLA** exited the residence and entered a white Dodge Ram. The Dodge Ram was towing a trailer containing construction equipment. Both license plates for the truck and trailer were expired.

3. An HSI Special Agent (SA) assisting ICE-ERO followed the Dodge Ram in his assigned government vehicle. After **QUINTANILLA** turned left on Culebra Rd, the HSI SA engaged his emergency lights and siren to initiate a vehicle stop. **QUINTANILLA** then made a right turn on Consuelo Rd and came to a stop on the right side of the street. An ICE-ERO Officer stopped behind the HSI SA's vehicle with his emergency lights engaged, and both approached the vehicle. TxDPS Criminal Investigations Division (CID) Special Agents (SA) were parked further down the street. ICE-ERO approached the driver's side, and the HSI SA approached the passenger side of **QUINTANILLA's** vehicle. HSI SA observed **QUINTANILLA** not answering or responding to ICE-ERO's questions. **QUINTANILLA** refused to lower the window, open the door, answer questions, cooperate with agents or officers, or follow any commands.

4. After multiple attempts to get **QUINTANILLA** to lower the window or answer any questions, the HSI SA walked around to the driver's side of **QUINTANILLA's** vehicle. HSI SA told the suspect to lower the window. **QUINTANILLA** ignored him. HSI SA tried to open the driver's side door, but it was locked. As the HSI SA attempted to break the driver's side glass with a glass-breaching tool in his right hand, **QUINTANILLA** put his vehicle in drive and started to flee the scene in his vehicle. The sudden movement caused the shards of glass to catch and cut the HSI SA's arm. TxDPS CID SA's blocked **QUINTANILLA's** vehicle by pulling in

front of him. HSI SA returned to his vehicle and pulled up approximately a car length behind **QUINTANILLA**'s vehicle to block him from reversing to flee the area. HSI SA put his vehicle in park. At that moment, **QUINTANILLA** put his car in reverse, ramming the HSI SA's vehicle. The HSI SA was forced to quickly move out of the way so he would not be injured by **QUINTANILLA**'s reversing vehicle, being used as a deadly weapon. The trailer attached to **QUINTANILLA**'s vehicle collided with the front of HSI SA's vehicle. HSI SA approached the driver's side of **QUINTANILLA**'s vehicle, removed broken glass from with window, and opened the door from the inside to remove **QUINTANILLA**. ICE-ERO gave **QUINTANILLA** multiple verbal commands to exit the vehicle and attempted to pull **QUINTANILLA** from the vehicle. **QUINTANILLA** refused to exit the vehicle and resisted ICE-ERO's attempts to extract him from the vehicle. TxDPS CID SA's quickly approached the vehicle and assisted in removing **QUINTANILLA** from the vehicle and restrained him in handcuffs. **QUINTANILLA** fought the law enforcement officers and forcibly, resisted, opposed, impeded, and interfered with official law enforcement duties.

5. The HSI SA's vehicle obtained damage to the front bumper and grill from the impact of the trailer connected to **QUINTANILLA**'s vehicle. HSI SA also obtained cuts on his right arm from when he smashed the glass when **QUINTANILLA** attempted to flee the scene. HSI SA was taken to the Texas Med Clinic for treatment of the wounds on his right arm.


6. **QUINTANILLA** used his truck and trailer as a deadly weapon, and his fleeing in the vehicle caused bodily injury to an HSI SA, requiring medical care. Based on the facts as stated in this document, there is probable cause to **Jaime Albert QUINTANILLA-Chavez** has committed federal offenses in violation of Title 18 U.S.C. § 111(a)(1)/(b), Assaulting, Resisting, or Impeding Certain Officers or Employees.

STEVEN
FUENTES

Digitally signed by
STEVEN FUENTES
Date: 2025.06.20
15:10:46 -05'00'

Steven Fuentes, Special Agent
Homeland Security Investigations

SWORN TELEPHONICALLY ON THIS 23rd DAY OF June, 2025.


HONORABLE JUDGE RICHARD B. FARRER
UNITED STATES MAGISTRATE JUDGE