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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

VIRGINIA REYES, and
ISAI CARRILLO,

Defendants.

CR 2:25-cr-00945-MEMF

I N D I C T M E N T

[18 U.S.C. § 372: Conspiracy to Impede a Federal Officer; 18 U.S.C. § 111(a)(1), (b): Assault on Federal Officer Using a Deadly or Dangerous Weapon and Inflicting Bodily Injury; 18 U.S.C. § 1361: Depredation of Government Property]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this indictment

1. VC Defensa was a volunteer organization that divided Ventura County into four geographic areas with a manager for each specific area. The organization operated a web presence at "www.vcdefensa.org" and various social media platforms which posted protest-related information and information about their Rapid Response Network ("RRN") activities, which information also included the identification of "ICE" vehicles believed to be associated with

1 federal immigration enforcement activities by U.S. Immigration and
2 Customs Enforcement.

3 2. VIRGINIA REYES joined VC Defensa in or about June 2025.

4 3. ISAI CARRILLO joined VC Defensa in or about June 2025.

5 4. On or about July 10, 2025, federal law enforcement agencies
6 executed multiple federal search warrants at work-site locations in
7 Camarillo and Oxnard, California, including one located on Laguna
8 Road in Camarillo, California (the "Glass House Farms").

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COUNT ONE

[18 U.S.C. § 372]

[ALL DEFENDANTS]

Paragraphs 1 through 3 of the Introductory Allegations of this Indictment are re-alleged and incorporated here.

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than on or about June 10, 2025, and continuing to at least on or about October 29, 2025, in Ventura County, within the Central District of California, and elsewhere, defendants VIRGINIA REYES ("REYES") and ISAI CARRILLO ("CARRILLO") did knowingly and willfully conspire and agree with persons known and unknown to the Grand Jury to prevent by force, intimidation, and threats, officers and employees of the United States Department of Homeland Security ("DHS"), which includes the United States Border Patrol ("USBP") and Immigration and Customs Enforcement ("ICE"), from discharging the duties of their offices, in violation of Title 18, United States Code, Section 372.

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. VC Defensa's RRN activities included mobile vehicle anti-ICE patrols to pursue DHS agents for the purpose of disrupting their law enforcement operations.

2. To facilitate this, VC Defensa operated a telephone hotline where members could call to report ICE sightings and other law enforcement activities. This hotline was advertised in organization

1 documents and was posted on the VC Defensa website and its various
2 social media pages.

3 3. VC Defensa members, including defendants REYES and
4 CARRILLO, utilized at least one encrypted third-party application to
5 communicate internally during their anti-ICE patrols and counter-
6 surveillance activities to update other members about the location of
7 DHS agents, take photographs of vehicles, collect information on DHS
8 agents and operations.

9 4. VC Defensa also communicated with its members and others
10 via social media posts.

11 5. VC Defensa coordinated their anti-ICE patrols with at least
12 one other RRN organization.

13 6. VC Defensa members, including defendants, traveled to
14 locations where DHS agents were present to disrupt law enforcement
15 operations.

16 C. OVERT ACTS

17 On or about the following dates, in furtherance of the
18 conspiracy and to affect the illegal objects thereof, defendants
19 REYES and CARRILLO, and others known and unknown to the Grand Jury,
20 committed various overt acts, within the Central District of
21 California, and elsewhere, including, but not limited to, the
22 following:

23 Overt Act No. 1: On June 10, 2025, defendant REYES sent a
24 photograph text to defendant CARRILLO of a large square white plastic
25 piece that was made into a shield with spray painted red lettering
26 that stated, "ICE OUT!!". Defendant REYES then stated, "Made em
27 myself", and defendant CARRILLO replied, "Dope Buy some laser
28 pointers green ones".

1 Overt Act No. 2: On July 10, 2025, VC Defensa communicated
2 with its members and the public to go to a business known as the
3 Glass House Farms in Camarillo, California where DHS agents were
4 performing their official duties. Defendants went to the location.

5 Overt Act No. 3: On July 10, 2025, at the Glass House Farms,
6 defendant REYES and others built a roadblock to prevent U.S.
7 Government vehicles from departing via the main exit of the Glass
8 House Farms.

9 Overt Act No. 4: On July 10, 2025, at the Glass House Farms,
10 REYES used her vehicle to block federal officers in U.S. Government
11 vehicles from leaving the location via an alternate exit, while other
12 individuals blocked the U.S. Government vehicles with their bodies, a
13 vehicle, and a bicycle.

14 Overt Act No. 5: On July 10, 2025, at the Glass House Farms,
15 while REYES and others blocked the U.S. Government vehicles, CARRILLO
16 and others threw large rocks at the U.S. Government vehicles,
17 damaging at least five vehicles and injuring at least one federal
18 contractor assisting officers and employees of the Department of
19 Homeland Security.

20 Overt Act No. 6: On July 10, 2025, at the Glass House Farms,
21 at or around the time that defendant REYES blocked U.S. Government
22 vehicles and defendant CARRILLO threw rocks at US Government
23 vehicles, defendant REYES made telephone calls to the VC Defensa
24 hotline telephone number.

25 Overt Act No. 7: On July 30, 2025, defendants REYES and
26 CARRILLO exchanged messages regarding pursuing U.S. Government
27 vehicles. Defendant CARRILLO stated, "Tail gate closer so they won't
28 get between you any the other vehicles". Defendant REYES stated,

1 "They tend to reverse and break check". Defendant CARRILLO stated,
2 "Nah don't let them get the chance . . . What you need is someone
3 with a bike . . . Don't give them the opportunity to get between you
4 them . . ." Defendant REYES stated, "So they can get hit and go
5 flying". Defendant CARRILLO stated, "It's a strategic counter
6 defense".

7 Overt Act No. 8: On August 6, 2025, REYES and others known
8 and unknown to the Grand Jury, damaged the tire of a U.S. Government
9 vehicle that was engaged in operations and left signs on the vehicle
10 identifying the vehicle as an ICE vehicle.

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COUNT TWO

[18 U.S.C. §§ 111(a)(1), (b); 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, intentionally and forcibly assaulted, resisted, impeded, intimidated, and interfered with victim C.M., a federal contractor employed by GS4 and assisting officers and employees of the Department of Homeland Security, a federal agency, while he was engaged in, and on account of, the performance of his official duties, and in doing so, used a deadly and dangerous weapon, namely, large rocks.

COUNT THREE

[18 U.S.C. §§ 1361; 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, willfully injured and committed a depredation against property of the United States, namely, a 2020 Ford Transit Van with a vehicle identification number ending in 2802 used by the Department of Homeland Security, causing damage in excess of \$1,000.00.

COUNT FOUR

[18 U.S.C. §§ 111(a)(1), (b); 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, intentionally and forcibly assaulted, resisted, impeded, intimidated, and interfered with victim A.A., a federal contractor employed by GS4 and assisting officers and employees of the Department of Homeland Security, a federal agency, while she was engaged in, and on account of, the performance of her official duties, and in doing so, used a deadly and dangerous weapon, namely, large rocks, and in doing so inflicted bodily injury on victim A.A.

COUNT FIVE

[18 U.S.C. §§ 1361; 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, willfully injured and committed a depredation against property of the United States, namely, a 2021 Ford Transit Van with a vehicle identification number ending in 2793 used by the Department of Homeland Security, causing damage in excess of \$1,000.00.

COUNT SIX

[18 U.S.C. §§ 111(a)(1), (b); 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, intentionally and forcibly assaulted, resisted, impeded, intimidated, and interfered with victim P.W., an employee with the Department of Homeland Security, while he was engaged in, and on account of, the performance of his official duties, and in doing so, used a deadly and dangerous weapon, namely, large rocks.

COUNT SEVEN

[18 U.S.C. §§ 1361; 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, willfully injured and committed a depredation against property of the United States, namely, a 2020 Ford Fusion with a vehicle identification number ending in 2015 used by the Department of Homeland Security, causing damage in excess of \$1,000.00.

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COUNT EIGHT

[18 U.S.C. §§ 111(a)(1), (b); 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, intentionally and forcibly assaulted, resisted, impeded, intimidated, and interfered with victim D.J., an employee with the Department of Homeland Security, while he was engaged in, and on account of, the performance of his official duties, and in doing so, used a deadly and dangerous weapon, namely, large rocks.

COUNT NINE

[18 U.S.C. §§ 1361; 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, willfully injured and committed a depredation against property of the United States, namely, a 2019 Chevrolet Tahoe with a vehicle identification number ending in 9247 used by the Department of Homeland Security, causing damage less than \$1,000.00.

COUNT TEN

[18 U.S.C. §§ 111(a)(1), (b); 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, intentionally and forcibly assaulted, resisted, impeded, intimidated, and interfered with victim O.S., an employee with the Department of Homeland Security, while he was engaged in, and on account of, the performance of his official duties, and in doing so, used a deadly and dangerous weapon, namely, large rocks.

COUNT ELEVEN

[18 U.S.C. §§ 1361; 2(a)]

[ALL DEFENDANTS]

On or about July 10, 2025, in Ventura County, within the Central District of California, defendants VIRGINIA REYES, ISAI CARRILLO, and others known and unknown to the Grand Jury, each aiding and abetting the other, willfully injured and committed a depredation against property of the United States, namely, a 2020 Ford Expedition with a vehicle identification number ending in 2070 used by the Department of Homeland Security, causing damage in excess of \$1,000.00.

COUNT TWELVE

[18 U.S.C. §§ 1361; 2(a)]

[VIRGINIA REYES]

On or about August 6, 2025, in Ventura County, within the Central District of California, defendant VIRGINIA REYES, and others known and unknown to the Grand Jury, each aiding and abetting the other, willfully injured and committed a depredation against property of the United States, namely, a 2020 Hyundai Sonata with a vehicle identification number ending in 4106 used by the Department of Homeland Security, causing damage less than \$1,000.00.

A TRUE BILL

/s/

Foreperson

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First Assistant United States
Attorney

ALEXANDER B. SCHWAB
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