

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**  
**UNDER SEAL**

I, Anthony Hourihan, being duly sworn on oath, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since February 2008. I have been employed as a SA with the FBI in the Charlotte Division for the past seventeen years. I have been the case agent, co-case agent, or participating agent on numerous types of investigations to include, but not limited to, financial-based and domestic terrorism investigations involving extremists associated with the "Sovereign Citizen Movement." Since October 2013, I have been assigned to the Safe Streets Task Force of the Charlotte Division of the FBI, and have participated in the investigations of Eurasian Organized Crime, Mexican Drug Trafficking Organizations, United Blood Nation (UBN), Nine Trey Gangsters, and drug trafficking organizations operating in and around the Charlotte, NC areas, more specifically the neighborhood communities of Hidden Valley, Lakewood, and Grier Heights; and other related crimes, including but not limited to, narcotics trafficking, murder, weapons possession, interstate transportation of stolen property; and the investigation of organized criminal activities, the laundering of monetary instruments associated with these crimes, and Racketeer Influenced and Corrupt Organization (RICO). In September of 2020, I participated in the OCDETF investigation into the members of the Pressure Gang, which included the use of four Title III intercepts, one of which I was the author and Affiant. In February of 2021, I initiated an investigation into a group calling themselves the Almighty Arms Gangster Bloods, which included the use of eight Title III intercepts, several of which I was the author and Affiant. I have participated in many aspects of criminal investigations including being the Affiant on numerous search warrants, the issuance of subpoenas, reviewing evidence, conducting physical and electronic surveillance, working with informants, and the

execution of search and arrest warrants. Additionally, I have interviewed and/or debriefed informants, and other witnesses who had personal knowledge regarding the investigations in which I have been involved. I have participated in previously obtained wire communication interceptions related to drug trafficking organizations (“DTO”).

2. I have participated in investigations involving the use of electronic surveillance techniques to include, but not limited to, court-authorized wire intercepts; video surveillance; global positioning satellite (“GPS”) trackers; and body-worn monitoring devices. These investigations have included violations of statutes listed under Titles 18 and 21 of the United States Code as well as violations under state law. As a result of these investigations, I have reviewed the conversations of dozens of individuals involved in drug related offenses.

3. I have participated in investigations which identified subjects and co-conspirators through telephone records, police reporting, financial documents, drug ledgers, photographs, and other documents. Furthermore, I have led and participated in investigations concerning the identification of co-conspirators through electronic devices and services: such as, social media platforms, cellphones, and computers. I have also participated in and conducted debriefs of individuals who were arrested and later cooperated with law enforcement. I have participated in investigations in which the court-authorized interception of communications or other electronic surveillance tools were utilized to further the investigation. I have received extensive training in investigations as a New Agent Trainee at the FBI Academy in Quantico, Virginia as well as follow on training as it relates to my current assignment.

4. This affidavit is being made for the purpose of securing a criminal complaint charging **Miguel Angel Garcia MARTINEZ** — described as being a Hispanic male, born on May

22, 2001, — with the offense of assaulting, resisting, impeding certain federal officers or employees, a violation of Title 18, United States Code, Section 111(a)(1) & (b).

5. All the information contained in this affidavit is the result of my own investigation, or it has been provided to me by other law enforcement authorities whom I believe to be reliable.

#### **FACTS IN SUPPORT OF PROBABLE CAUSE**

6. On the afternoon of November 16, 2025, at approximately 12:15PM, **Miguel Angel Garcia MARTINEZ** did use a white Dodge Sprinter Van 2500 bearing North Carolina license plate ZYX-5327 with Vehicle Identification Number (VIN) WD0PD644565965989<sup>1</sup> to conduct a Felony Assault, Resist, and Impede a Federal Officer, in violation of Title 18, U.S.C. Sections 111(a)(1) & (b), by physically striking a Ford Expedition bearing North Carolina license plate KJL-2894 being used by Special Agents of Immigration Custom Enforcement's ("ICE") Special Response Team to conduct operations in the area of Charlotte, North Carolina, falling within the Western District of North Carolina.

7. On November 16, 2025, Federal Officers of ICE and Federal Officers of the United States Border Patrol were meeting in a public parking lot near the Pull-A-Part located at 6024 North Tryon Street, Charlotte, North Carolina, beginning an operation. While arriving, a Supervisory Border Patrol Agent ("SBPA") observed a white sprinter van that the SBPA recognized as the same van that followed him earlier as the SBPA traveled to meet and conduct an operation. After observing the white van, the SBPA communicated a description of the van to the Border Patrol Operations Center who reported back that the same vehicle had previously been observed by a Border Patrol Agent at a separate location where Border Patrol personnel were conducting an operation.

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<sup>1</sup> According to North Carolina Department of Motor Vehicles (NCDMV), the vehicle is registered to Miguel Angel Garcia MARTINEZ of 1829 Finchley Dr., Charlotte, NC 28215.

8. Based on that information, Federal Law Enforcement Officers attempted to make voluntary contact with the driver of the white sprinter van, later identified as **Miguel Angel Garcia MARTINEZ**, to warn **MARTINEZ** to stop following and impeding Border Patrol operations. Federal Law Enforcement Officers exited their vehicles, with clear markings as Law Enforcement Officers, and approached the sprinter van. **MARTINEZ** fled, driving aggressively and at a high rate of speed. **MARTINEZ** attempted to evade Federal Officers by swerving in and out of traffic, crossing medians and sidewalks, as well as driving into oncoming traffic down North Tryon Street, in a concerted effort to avoid being stopped or contacted by Border Patrol.

9. During his flight, Law Enforcement Officers, using lights and sirens, attempted to stop **MARTINEZ** from fleeing. As **MARTINEZ** swerved from the oncoming traffic lane to resume proper lane of travel, **MARTINEZ** drove the sprinter van into the front right side of a government issued vehicle, a Ford Expedition, which at the time of the collision was operating lights and sirens, and contained four Federal Officers of ICE. The Federal Officer sitting in a passenger seat of the struck Expedition captured video and audio of **MARTINEZ**'s flight and the collision using his cellphone. The video depicts **MARTINEZ** turning his sprinter van into the Expedition's direction of travel as it crossed back over to the other side of the street. The Federal Officer driving the Expedition appeared to apply the brakes to some degree. **MARTINEZ**'s sprinter van struck the Expedition's right front fender. Both **MARTINEZ**'s van and the Expedition remained operable following the collision.

10. **MARTINEZ** continued to flee until ultimately being boxed in by vehicles being driven by other Federal Law Enforcement Officers. After officers successfully stopped **MARTINEZ**'s vehicle, a Customs Border Patrol Officer was injured breaking the glass of the window to the sprinter van to remove and detain **MARTINEZ**. **MARTINEZ** was then placed

under arrest. As **MARTINEZ** was being removed from his vehicle, he told Federal Officers he had a firearm in a black bag in his vehicle. Federal law enforcement transported **MARTINEZ** to the hospital where he was treated and released.

11. That same day, at approximately 5:40PM, FBI Special Agents read **MARTINEZ** his *Miranda* Rights, which he waived by signing the warnings. Those same Special Agents interviewed **MARTINEZ** about the incident at FBI Charlotte headquarters.

12. **MARTINEZ** told the agents that he was attempting to locate Border Patrol to confirm their locations and upload pictures into an invitation only Instagram group chat. These locations and photographs were later uploaded by members of the Instagram group chat to a public Instagram account of which **MARTINEZ** could not recall the name.

13. **MARTINEZ** located Border Patrol Officers at a United States Postal office located at 6700 N. Tryon St. **MARTINEZ** pulled into the parking lot, got out of his sprinter van, and took pictures of the Border Patrol Officers, one of which was holding a long gun. While out of his sprinter van, **MARTINEZ** observed a Border Patrol Officer exit his vehicle and make a gesture with his hands which **MARTINEZ** interpreted as asking what are you doing here. **MARTINEZ** then entered his sprinter van and uploaded the pictures he took of Border Patrol and departed the parking lot.

14. While driving to his mother and father's house down N. Tryon St., **MARTINEZ** said he observed a Tahoe, a Denali, and a KIA van driving on N. Tryon St. **MARTINEZ** observed one of the vehicles bore a government plate, though he could not recall which vehicle. The vehicles pulled into a bowling alley off N. Tryon St., and **MARTINEZ** followed. **MARTINEZ** conducted a drive-by of the vehicles to confirm they were Border Patrol, and after confirming, **MARTINEZ** parked his sprinter van, took pictures of the Border Patrol Officers, and uploaded

his pictures to the private Instagram group chat. Several of the Border Patrol vehicles exited the parking lot, and turned onto N. Tryon St. **MARTINEZ** left the parking lot, turned onto N. Tryon St., and ended up behind the Border Patrol vehicle convoy. **MARTINEZ** saw several of the vehicles making up the Border Patrol convoy pull into the Pull-A-Part parking lot, and **MARTINEZ** followed, circling the parked Border Patrol vehicles twice; the second time **MARTINEZ** came within eight or ten feet of the Border Patrol vehicles while taking pictures. Two Border Patrol Officers exited their vehicles and began giving **MARTINEZ** commands to exit his vehicle. One Border Patrol Officer grabbed the handle of **MARTINEZ**'s van and attempted to open the door. **MARTINEZ** accelerated the van away while the Border Patrol Officer pounded on the sprinter van.

15. **MARTINEZ** made a right onto N. Tryon St. and noticed the Border Patrol vehicles following him. Federal agents asked **MARTINEZ** questions about the chase and the collision as it was depicted in the video capturing the incident. **MARTINEZ** refused to answer whether he drove recklessly, over medians and toward oncoming traffic. He also refused to answer whether he struck a federal law enforcement vehicle. **MARTINEZ** recalled the Border Patrol vehicles trying to box him in. At first Border Patrol was unsuccessful, but after what **MARTINEZ** estimated was ten to thirty minutes, Border Patrol was finally able to box **MARTINEZ** in and he stopped his vehicle.<sup>2</sup>

### CONCLUSION

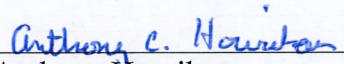
16. Based upon training, experience, and the facts of this investigation, I submit that there is probable cause for a criminal complaint against, and arrest warrant for, **Miguel Angel Garcia MARTINEZ** for felony assault, resist, and impede a federal officer, while engaged in the

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<sup>2</sup> The video of the incident supports that the chase lasted less than five minutes.

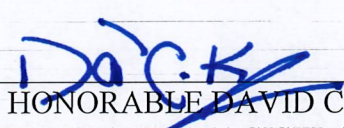
performance of his official duties, and in committing the acts did use a deadly or dangerous weapon, that is a sprinter van, in violation of Title 18, United States Code, Section 111(a)(1) & (b); therefore, I request that the Court issue a criminal complaint and arrest warrant for the same.

Respectfully submitted,

  
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Anthony Hourihan  
Special Agent  
Federal Bureau of Investigation

*Affidavit Reviewed by Assistant United States Attorneys Erik Lindahl and Caryn Finley in the Western District of North Carolina*

Subscribed and sworn to before me on this 17th day of November 2025.

  
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THE HONORABLE DAVID C. KEESLER  
UNITED STATES MAGISTRATE JUDGE  
WESTERN DISTRICT OF NORTH CAROLINA