

UNITED STATES DISTRICT COURT
for the
District of New Mexico

United States of America
v.

26-2291 MJ

Caleb Lee Brown

Case No.

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 dates of May 14, 2026 in the county of Dona Ana in the District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 111(a)(1):

Assault, resistance, and opposition of an officer of the United States resulting in physical contact.

This criminal complaint is based on these facts:

See attached Affidavit in Support of an Application for an Arrest Warrant, attached hereto and incorporated herein.

[X] Continued on the attached sheet.

[Handwritten signature]
Complainant's signature

Rodney Roberts, FBI Special Agent
Printed name and title

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1

by

submitted electronically and sworn (specify reliable electronic means).

Date:

Judge's signature

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

IN THE MATTER OF THE ARREST OF:
Caleb Lee Brown

Case No.

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT

I, Rodney Roberts, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for an arrest warrant for Caleb Lee Brown (Hereinafter, BROWN) for violations of 18 U.S.C. § 111(a)(1) (Assault, resistance, and opposition of an officer of the United States resulting in physical contact).

2. I have been employed as a Special Agent of the FBI since August 2023. I am classified, trained, and employed as a federal law enforcement officer with statutory arrest authority charged with conducting criminal investigations of alleged violations of federal criminal statutes, including Title 18 of the United States Code. I am currently assigned as a criminal investigator for the Albuquerque Field Office, Las Cruces Resident Agency, located in southern New Mexico (NM).

3. During my tenure with the FBI, I have received formal and informal training in conducting a variety of criminal investigations. I have executed or participated in the execution of search and arrest warrants. My investigative training and experience include, but is not limited to, conducting surveillance, interviewing subjects, witnesses, and victims, managing cooperating sources, issuing subpoenas, and analyzing records.

4. As a Special Agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. § 111(a)(1), and I am authorized by the Attorney General to arrest a person.

5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter. The information contained in this affidavit is personally known to me based on my training and experience, was gathered or revealed to me personally during the course of this investigation or was gathered or revealed to other sworn law enforcement officers during the course of this investigation and subsequently communicated to me.

6. I make this affidavit in support of a criminal complaint that there is probable cause to find that on or about May 14, 2026, BROWN, assaulted, resisted, and opposed an officer of the United States, United States Border Patrol (USBP) Agent, resulting in violation of 18 U.S.C. § 111(a)(1).

7. Title 18 U.S.C. § 111(a)(1), makes it a crime for someone to "forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in section 1114 of this title while engaged in or on account of the performance of official duties." A Border Patrol Agent constitutes an officer of the United States pursuant to 18. U.S.C §1114.

PROBABLE CAUSE

Background

8. On May 14, 2026, agents of the FBI Las Cruces Resident Agency learned of two United States Border Patrol (USBP) agents who had been assaulted, resisted, and opposed while engaged in the performance of official duties near Santa Teresa, NM.

9. On May 13, 2026, at roughly 11:45 P.M., BROWN was observed heading southbound at the Santa Teresa Port of Entry (POE), appearing to try to enter Mexico. This POE closed at 11:00P.M., so BROWN was observed performing a "U-turn" and started traveling northbound in the southbound lane. USBP Agents attempted to perform a vehicle stop to prevent him from going into oncoming traffic on a highway, but BROWN continued driving. A short vehicle pursuit was initiated, until BROWN's vehicle was immobilized with spike strips. The vehicle BROWN was driving had no license plate, the VIN number was scratched off, and it was registered to BROWN's father. BROWN was taken into custody and transported to the Santa Teresa Border Patrol Station (STN) for questioning.

10. Once at the station BROWN was combative and refused to cooperate with standard booking procedures. Records checks were performed and it was found BROWN was a United States Citizen with no active warrants. Upon checking records, it was found that BROWN's father, who owned the vehicle, had a protective order against BROWN. BROWN also had a large amount of US currency in his wallet.

11. On May 14, 2026, the two USBP Agents (hereinafter "BPA1" and "BPA2") who were assaulted, were working the processing floor at STN. These two agents were interviewed by FBI SA Rodney Roberts and FBI SA Ryan Jackson and they provided the following information:

12. On May 14, 2026, BPA1 and BPA2 were working in the processing center of the STN. They were instructed by their supervisor to give BROWN his property and release him from custody.

13. BPA1 and BPA2 told BROWN they were releasing him and would take him to the Love's Travel Stop located at 2401 Airport Rd, Santa Teresa, NM 88008. BROWN was given his property back, unhandcuffed, and transported in the back seat of a marked USBP F-150 truck. During this time, BPA1 was in the front passenger seat, BPA2 was driving, and BROWN was in the rear passenger seat.

14. At around 05:45A.M., at the Love's Travel Stop, BROWN refused to get out of the vehicle. BPA1 exited the vehicle and opened the rear passenger door where BROWN was seated. BROWN then hopped out of the truck and using two hands, pushed BPA1 backwards. After this push, BROWN swung his right fist and made a direct strike to BPA1's left side of his face. BPA1 got his baton out and struck BROWN in the left leg and then he dropped his baton.

15. BPA2 saw this happen, quickly got out of the vehicle, and went around the rear of the vehicle to get to the passenger side. Once on this side, BROWN shifted focus to BPA2 and "squared up with him". BROWN attempted to strike BPA2 multiple times and landed one punch on the bridge of BPA2's nose.

16. BPA2 got his baton out and struck BROWN twice in the leg. BROWN grabbed BPA2's baton and BPA2 took BROWN to the ground. BPA2 and BROWN were on the ground fighting for control of the baton when BPA1 got onto BROWN's legs. BPA1 and BPA2 continued to fight with BROWN over control of the baton.

17. BPA1 radioed they were being assaulted and asked for backup from STN. Eventually, BROWN became tired and started to submit to BPA1 and BPA2. He was placed in handcuffs and placed back into the USBP vehicle.

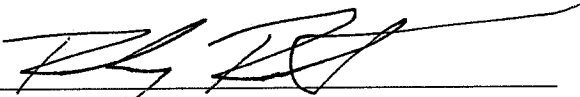
18. A witness watched the fight and was later interviewed by a USBP agent on body camera. On this video, the witness described the incident as above, where BROWN attacked BPA1 and BPA2.

19. BPA1 and BPA2 were both taken to a local hospital for medical exams. BPA1's injuries included the strike to the left side of his face and scrapes from fighting on the ground. BPA1's upper lip was visibly swollen and had bruising on the inside. His gums were also bruised and swollen. BPA1 also had scrapes on his knees from fighting on the ground on a concrete surface. BPA2's injuries included a bruise/cut on the bridge of his nose from the strike and scrapes on his arms and legs from fighting on the ground on a concrete surface.

CONCLUSION

20. Based on the aforementioned information and investigation, I submit that probable cause exists that Caleb Lee Brown has committed assault, resistance, and opposition of an officer of the United States resulting in physical contact in violation of 18 U.S.C. § 111(a)(1). AUSA Richard Williams was apprised of the foregoing facts and accepted this case for federal prosecution.

Respectfully submitted,



Rodney Roberts
Special Agent
Federal Bureau of Investigation

submitted electronically and sworn telephonically to before me on _____, 2026.

U.S. Magistrate Judge