# AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Omar Lawton, Supervisory Detention and Deportation Officer with the Department of Homeland Security, United States Immigration and Customs Enforcement (ICE), being duly sworn, depose and state under penalty of perjury that the following is true to the best of my information, knowledge and belief.

1. I am a Supervisory Detention and Deportation Officer with ICE and have held the position since December 2024. I previously held the title of Deportation Officer from September 2015 until December 2024 and Immigration Enforcement Agent from July 2007 until September 2015. I am currently stationed in Centennial, Colorado, at the Denver Field Office, assigned to the Prosecutions Unit. I have completed training at the Federal Law Enforcement Training Center, Brunswick, Georgia, from July 2007 to November 2007.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses and surveillance footage from the Denver County Jail and the Denver Contract Detention Facility. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. This affidavit is submitted in support of an arrest warrant and criminal complaint charging Abraham Gonzalez-Romero a violation of Title 18 United States Code § 18 U.S.C. 111(a)(1). I submit the facts below outline probable cause to believe that, on February 28, 2025, in the State and District of Colorado, the defendant, Abraham Gonzalez-Romero forcibly assaulted, resisted, and opposed federal officers in performance of their official duties, with physical contact, in violation of Title 18, United States Code, § 111(a)(1).

4. Abraham Gonzalez-Romero ("Gonzalez") is a 23-year-old male, native and citizen of Venezuela by birth in Venezuela in 2001. He last entered the United States unlawfully at or near Eagle Pass, Texas, on or about September 20, 2023. On September 21, 2023, Gonzalez was served a Notice to Appear (NTA) for immigration removal proceedings and released on an Order of Release on Recognizance. Gonzalez subsequently violated the conditions of his release.

5. Gonzalez was next encountered by Denver Immigration and Customs Enforcement (ICE) on March 12, 2024. Gonzalez was arrested by the Castle Rock Police Department in Douglas County, Colorado, for an arrest warrant from Denver for charges related to Attempted Murder, Kidnapping, Assault and Discharge of a Firearm. These charges subsequently were dismissed. Biometric records obtained at time of arrest were forwarded to the Law Enforcement Support Center (LESC) and positively matched those of "Abraham Gonzalez-Romero," with the immigration history and status detailed above. Based on this information, an ICE detainer request was submitted to Douglas County Jail, in Castle Rock, Colorado, on March 12, 2024. On March 20, 2024, Gonzalez was transferred to the Denver Justice Center, Denver County, for the pending charges and a new ICE detainer was lodged with the jail.

6. On February 28, 2025, ICE Denver Fugitive Operations Unit and Homeland Security Investigations (HSI) Denver encountered Gonzalez upon his release from the Denver County jail, located at 10500 East Smith Road, in Denver, Colorado. At approximately 1602 hours Mountain Standard Time, ICE Officers positively identified Gonzalez while walking out of the Denver County Jail towards the exit gate. The officers present had ICE badges and placards clearly visible as they approached Gonzalez. As he exited the gate, Gonzalez recognized that officers were approaching and started walking in an opposite direction. As Deportation Officer (DO) Blevins

attempted to contact Gonzalez, Gonzalez jumped over a nearby handrail and began to run east and away from the officers. The officers chased Gonzalez on foot through the lot while yelling "Police" and "Stop." Gonzalez had no exit and turned west towards Supervisory Detention and Deportation Officer (SDDO) Cruz. SDDO Cruz ran to position himself at a choke point between an architectural structure and the building, a space about ten feet wide. SDDO Cruz stopped in the middle of the gap, directly in front of Gonzalez. Gonzalez continued running at a high rate of speed, and instead of swerving to avoid SDDO Cruz to either side, he attempted to run straight through SDDO Cruz and knock him out of the way with his body. In the moment before impact, SDDO Cruz saw that Gonzalez did not slow down or hesitate, but instead continued at a constant rate of speed, which was a sprint, until the two collided. SDDO Cruz was standing with his feet planted at the moment of collision. SDDO Cruz was able to secure a hold on Gonzalez, but was knocked backwards from the impact, and both fell to the ground. Gonzalez's body impacted SDDO Cruz in the upper left torso with significant force. SDDO Cruz was able to climb on top of Gonzalez and began attempting to subdue him and place him under arrest. While on the ground, Gonzalez resisted arrest by locking his arms to the centerline of his body. The officers attempted to restrain and handcuff him, giving orders to stop resisting. Gonzalez managed to get back to his feet while the officers were attempting to get his arms behind his back. DO Blevins then drew his TASER and said, "Stop resisting or I am going to tase you." Gonzalez failed to comply, aggressively writhing to escape SDDO Cruz and DO Velazquez, at which time DO Blevins verbally warned his fellow officers he was going to use his TASER, and deployed two probes, one in the upper right portion of the back and the other in the lower right hamstring. Gonzalez did not experience neuromuscular incapacitation (NMI) and DO Blevins deployed a third probe to the lower right portion of Gonzalez' back, successfully achieving NMI. Officers were then able to

lower Gonzalez to the ground on his stomach and secure him in handcuffs. While handcuffed, officers conducted an immediate pat down for contraband and removed all three TASER probes before raising Gonzalez to his feet. Gonzalez immediately complained of foot pain and became limp while being escorted to a nearby vehicle. Officers then lowered Gonzalez to the ground, repositioned, and lifted him up entirely off the ground to move him into the waiting vehicle. After being placed in the backseat, SDDO Cruz performed a visual check for any injuries to Gonzalez Officers then asked Gonzalez multiple times in Spanish if he wanted any medical attention to which he declined. DO Armstrong, assisted by DO Blevins and Black, then transported Gonzalez 1.5 miles to the ERO Denver Contract Detention Facility (DCDF) for screening by medical the officers and processing. Upon arriving at the DCDF, Gonzalez began violently kicking the inside of the caged vehicle attempting to escape. Once inside the secure lot at DCDF, officers removed Gonzalez from the vehicle and began walking him into the facility. While escorting him inside the DCDF doors, Gonzalez started to pull away and officers had to pin his body against the door to control his resistance. Gonzalez then started banging his head against the door. DO Armstrong tried to prevent this by holding his head and while trying to gain control of Gonzalez' head, Gonzalez attempted to bite DO Armstrong. Gonzalez then pushed off the wall using his feet, knocking all officers off balance. DO Blevins then drew his Oleoresin Capsicum spray and ordered Gonzalez to stop being combative. Gonzalez refused to stop and DO Blevins sprayed Gonzalez, effectively ceasing his resistance. Officers were then able to get him inside the detention center, at which point they handed him over to DCDF officers and medical personnel for decontamination. Upon decontamination and provision of new clothing by DCDF staff, Gonzalez was placed into a holding cell. As DO Blevins, Armstrong, and Black passed through the holding area before exiting the DCDF, Gonzalez began punching the glass, saying he wanted to fight the officers.

7. I submit the facts set forth above provide probable cause to believe that on February 28, 2025, in the State and District of Colorado, the defendant, Abraham Gonzalez-Romero, violated Title 18, United States Code, Section 111(a)(1) which prohibits any person from forcibly assaulting, resisting, or opposing, with physical contact, a federal officer engaged in performance of official duties.

I, Omar Lawton, being duly sworn according to law, depose and say that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information and belief.

*s/Omar Lawton*
Omar Lawton,
Supervisory Detention Deportation Officer
DHS/ICE

Sworn to before me this 14th day of March , 2025

Hon. Scott T. Varholak
Chief United States Magistrate Judge

**Affidavit reviewed and submitted by E. Garreth Winstead, Assistant United States Attorney.**