

**FILED**  
1/30/2026

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

AUSA Vincenza Tomlinson (312) 353-5496

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOSE ALBERTO RAMIREZ

Case No.: 1:26-cr-00046  
BETH W. JANTZ  
Magistrate Judge

**AFFIDAVIT IN REMOVAL PROCEEDING**

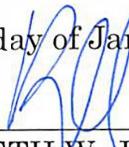
I, LUKE MANLOVE, personally appearing before United States Magistrate Judge BETH W. JANTZ and being duly sworn on oath, state that as a federal law enforcement officer I have been informed that JOSE ALBERTO RAMIREZ has been charged by Complaint in the District of Minnesota with the following criminal offense: transmitting a threat in interstate and foreign commerce to injure the person of another in violation of Title 18, United States Code, Section 875(c).

A copy of the Complaint is attached. A copy of the arrest warrant also is attached.



LUKE MANLOVE  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO before me this 30th day of January, 2026.



BETH W. JANTZ  
United States Magistrate Judge

UNITED STATES DISTRICT COURT  
for the  
District of Minnesota

UNITED STATES OF AMERICA

Investigative – Filed Under Seal

v.

Case No. 26-mj-95 (DJF)

JOSE ALBERTO RAMIREZ

**CRIMINAL COMPLAINT**

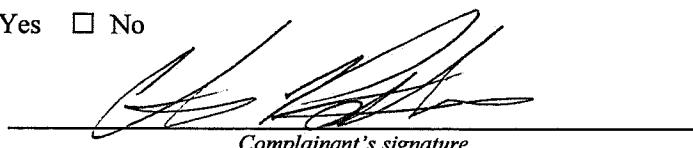
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

**Count 1:** On or about January 15, 2026, in the State and District of Minnesota, defendant JOSE ALBERTO RAMIREZ did knowingly transmit, in interstate and foreign commerce, communications via a cellphone consisting of text messages and a voicemail containing threats to injure the person of another, namely Victim A, a Federal law enforcement officer, with the purpose of issuing a threat, and with knowledge that the communication would be viewed as a threat, and consciously disregarding a substantial and unjustifiable risk that the communication would be viewed as a threat, all in violation of Title 18, United States Code, Section 875(c).

I further state that I am a Special Agent with the FBI, and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT**

Continued on the attached sheet and made a part hereof:  Yes  No

  
Complainant's signature

Christopher Potts, Special Agent, FBI

Printed name and title

Sworn to and signed before me, by reliable electronic means (FaceTime and box on USAfx), pursuant to Fed. R. Crim. P. 41(d)(3),

Date: January 28, 2026

City and State: Minneapolis, MN

  
Judge's Signature  
Dulce J. Foster  
United States Magistrate Judge  
Printed Name and Title

**UNITED STATES DISTRICT COURT**  
 for the  
 District of Minnesota

UNITED STATES OF AMERICA

**Investigative – Filed Under Seal**

v.

Case No. 26-mj-95 (DJF)

JOSE ALBERTO RAMIREZ

**ARREST WARRANT**

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay  
 (name of person to be arrested) JOSE ALBERTO RAMIREZ,

who is accused of an offense or violation based on the following document filed with the court:

Indictment  Superseding Indictment  Information  Superseding Information  Complaint

**Count 1:** On or about January 15, 2026, in the State and District of Minnesota, defendant JOSE ALBERTO RAMIREZ did knowingly transmit, in interstate and foreign commerce, communications via a cellphone consisting of text messages and a voicemail containing threats to injure the person of another, namely Victim A, a Federal law enforcement officer, with the purpose of issuing a threat, and with knowledge that the communication would be viewed as a threat, and consciously disregarding a substantial and unjustifiable risk that the communication would be viewed as a threat, all in violation of Title 18, United States Code, Section 875(c).

Date: January 28, 2026
  
 Issuing officer's signature
City and State: Minneapolis, MNDulce J. Foster, United States Magistrate Judge

Printed Name and Title

**Return**

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: JOSE ALBERTO RAMIREZ

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: 1997

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_

Weight: \_\_\_\_\_

Sex: \_\_\_\_\_

Race: \_\_\_\_\_

Hair: \_\_\_\_\_

Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (name, relation, address, phone number): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (if applicable): \_\_\_\_\_

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
26-mj-95 (DJF)

UNITED STATES OF AMERICA

FILED UNDER SEAL

v.

JOSE ALBERTO RAMIREZ

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Christopher Potts, being first duly sworn, hereby depose and state as follows:

Introduction And Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since September 2018. I am currently assigned to a squad that investigates violent crime, narcotics distribution, and crimes against children in Indian Country. Before working crimes in Indian Country, I spent approximately two years investigating gang-related crime in Chicago, IL. I have experience in investigating counterterrorism matters, including threats of violence against federal officers.

2. This Affidavit is submitted in support of a criminal Complaint alleging that, on or about January 15, 2026, Jose Alberto RAMIREZ (YOB 1997) transmitted online threats to injure another person, namely a Federal law enforcement officer, in violation of 18 U.S.C. § 875(c) ("the Subject Offense").

3. The facts set forth in this Affidavit are based on my own personal knowledge of the investigation, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, my

review of documents and records related to this investigation, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. This Affidavit, however, is intended to show only that there is sufficient probable cause to support the charges alleged in the Complaint and does not set forth all of my or the government's knowledge about this matter.

4. Based on my training and experience and the totality of the facts and circumstances set forth in this Affidavit, and the reasonable inferences therefrom, Your Affiant has probable cause to believe that RAMIREZ committed the Subject Offense.

**FACTS SUPPORTING PROBABLE CAUSE**

**Background**

5. On January 14, 2026, a Homeland Security Investigations (HSI) federal agent with Immigration Customs Enforcement (ICE) Enforcement Removal Operations (ERO) was involved in a shooting that occurred in the area of the 600-block of 24th Avenue North, in Hennepin County, Minneapolis, MN, while conducting an immigration enforcement action. Agents from the FBI Minneapolis Violent Crime Squad and personnel from the FBI Evidence Response Team (ERT) responded to the scene to investigate the incident and to gather evidence.

6. After collecting evidence from the scene and during the course of their investigation, a large group of protestors became violent and made the scene unsafe. Due to the number of protesters and the increasing tension and violence, law

enforcement personnel in the area were unable to maintain a perimeter, and FBI agents and ERT personnel were forced to evacuate the area on foot for their personal safety with the help of other law enforcement officers and agents who responded to the scene. FBI agents were forced to leave two government-owned vehicles parked near the scene.

7. Several protestors attacked, vandalized, damaged, and broke into the two government-owned vehicles left at the scene, causing over an estimated \$20,000 worth of damage to each vehicle, including broken windows and mirrors, spray painting of the exterior, punctured tires, damage to the engine and components, and ransacking and destruction of the interior of the vehicles. FBI-issued equipment and materials, including a rifle, rifle suppressor, a handgun, tactical vests, FBI IDs and building access badges, and various personal and FBI documents were stolen from the vehicles. Some of the documents stolen were rosters with employees' phone numbers, email addresses, and home addresses, as well as driver's licenses.

8. After the employees' personal information and documentation was compromised, several of the documents, including residential addresses, phone numbers, and emails, were posted publicly online on social media. Shortly thereafter, approximately 10 to 15 FBI Agents and employees, including Victim A, a Minneapolis FBI Special Agent, began receiving multiple harassing and threatening phone calls and emails and suspicious drive-bys to their residences, where vehicles would slow down as they passed the employees' residences before driving away.

January 22, 2026 Interview With Victim A

9. Your Affiant reviewed an interview report drafted by FBI SA Christine Case that documented her interview with Victim A on January 22, 2026. Victim A stated that Victim A began receiving threatening and harassing communication on January 14, 2026, shortly after the FBI vehicles were vandalized and damaged in North Minneapolis. Victim A stated that the majority of the communications were harassing in nature and several were perceived as actual threats to harm Victim A.

10. SA Case reviewed some of the harassing and threatening text messages, emails, and voicemails that Victim A received on Victim A's work cellphone. One email sent to Victim A contained the following text:

*"We'll see how tough you are when I firebomb [physical address], Cincinnati, OH 45242."<sup>1</sup>*

11. Victim A also showed SA Case a social media message on Facebook that was sent to Victim A's child that read:

*"How does it feel to be the [child] of you're your dad's info leaked online and I find it incredibly embarrassing that he's FBI, but so much is available about him and his family [squirm emoji]."*

12. Victim A told SA Case that this message was extremely upsetting, because Victim A's child was away for school. Victim A noted that if this individual was in the same area as Victim A's child, Victim A would strongly consider relocating that family member out of that area to another state.

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<sup>1</sup> Victim A was unfamiliar with this physical address but told SA Case that he received three messages from the same sender.

13. The threatening communications have had a significant impact on Victim A's personal and professional life. Victim A is afraid for Victim A's immediate family's safety and has had to take significant security precautions at work and at home to ensure the safety of Victim A and Victim A's immediate family.

January 25, 2026 Victim A Cellphone Review

14. On January 25, 2026, Your Affiant reviewed text messages, emails, and voicemails sent by approximately 23 different senders to Victim A's work cellphone. Your Affiant observed multiple text messages and emails that contained harassing and threatening communications. Some of the communications directed at Victim A included multiple email addresses of Victim A that contained accurate variations of Victim A's name in them. Other messages accused Victim A of being a pedophile and a "nazi." Victim A received one text message that read "Gotcha Bitch!!!187."<sup>2</sup>

15. I reviewed a thread of text messages that were sent on January 15, 2026, at approximately 6:02 A.M. and 6:03 A.M. from cellular telephone number **224-490-7574**. The text messages were sent in succession and respectively stated the following, "[Victim A's Full Name], "Yahahahahahaha bitch ass nigga, I know where your mom lives bro. And your dad. And your kids buddy." "Get home safe and fast."<sup>3</sup> From the context of the messages, Your Affiant has probable cause to believe that the sender was threatening to cause harm to both Victim A and/or Victim A's immediate family members.

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<sup>2</sup> Your Affiant conducted an online search and learned that "187" is California police code and Penal Code section 187 for murder.

<sup>3</sup> The sender used Victim A's full name.

16. Your Affiant also reviewed a voicemail that was sent from the same phone number **224-490-7574** on January 15, 2026, at approximately 6:01 A.M., approximately one minute before the above-described text messages were sent from the same number. The voicemail, which was approximately seven-seconds long, stated the following:

*“What up [Victim A’s First Name]? You bitch ass nigga. Your day will come nigga. Bitch ass nigga.”<sup>4</sup>*

Identification of Jose Alberto RAMIREZ as the User of 224-490-7574

17. After reviewing the threatening text messages and voicemail received by Victim A on Victim A’s government-issued device from phone number 224-490-7574, FBI personnel conducted a search for that phone number through a law enforcement database. The search revealed that the subscriber for phone number 224-490-7574 was Jose Alberto RAMIREZ (YOB 1997).

18. During the review of the law enforcement records, Your Affiant discovered an “Incident Detail Report” that was generated by officers with the Village of Schaumberg Police Department in Schaumberg, Illinois. The incident report detailed an October 10, 2024, harassment complaint that was provided by a manager at the Woodfield Mall in Schaumberg, IL. The manager reported an employee named Jose RAMIREZ to police and provided telephone number 224-490-7574, the same number associated with the threatening texts and voicemail described above. The report noted that RAMIREZ was terminated for threatening to shoot another

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<sup>4</sup> The caller used a command and accurate variation of Victim A’s first name.

employee. The report also noted that RAMIREZ was sending threatening messages that he would be returning to the workplace despite being fired.<sup>5</sup>

19. On January 25, 2026, Your Affiant requested Illinois driving records and found RAMIREZ's driver's license with YOB 1997, listing his address and apartment number as 1310 Valley Lake Drive, Apt 624, Schaumburg, IL.

20. On January 25, 2026, Your Affiant learned that the carrier for the device was AT&T. Your Affiant requested an Emergency Disclosure of Records (EDR) to determine the location of the subject device and its subscriber information. AT&T complied with the EDR and sent location data to Your Affiant and FBI SA Nicole Lopez. SA Lopez, a member of the Cellular Analysis and Survey Team (CAST), determined that the apartment listed on RAMIREZ's Illinois Driver's License was within the 122-meter area of the location data that AT&T provided.

21. The subscriber information provided by the AT&T indicates that phone number 224-490-7574 is an active number and is subscribed to a "Leflie Colin."<sup>6</sup> In Your Affiant's training and experience, Your Affiant knows that individuals will sometimes use false names to conceal their real name on cellphone subscriber information. The subscriber's address, 1310 Valley Lake Dr, Schaumburg, IL 60195, however, is the same address that RAMIREZ has listed on his Illinois Driver's License as discussed above.<sup>7</sup> Additionally, the returned subscriber information lists

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<sup>5</sup> The incident report noted that no charges were filed at the time of the incident.

<sup>6</sup> FBI personnel conducted an NCIC check and did not find an individual with that matching name.

<sup>7</sup> No apartment number is listed in the subscriber information provided by AT&T.

a contact home email address as “officialjayare@yahoo.com.” Your Affiant believes that the email address is read “official jay are.” Your Affiant notes that the letters “J.A.R.” are also RAMIREZ’s initials. Additionally, the subscriber records show that the phone has had the same subscriber since March 2024, which predates the October 2024 incident reported by RAMIREZ’s employer as discussed above.

22. I reviewed criminal history information for RAMIREZ, which shows. RAMIREZ has several felonies and misdemeanors in Illinois including: Misdemeanor Domestic Battery/Physical Contact (2017), Felony Burglary (2017), Felony Mob Action (2020), Felony Burglary (2023).

## CONCLUSION

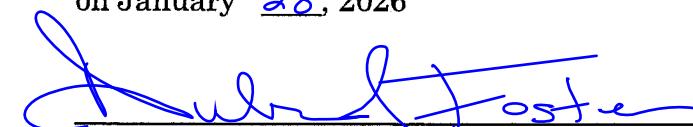
23. Based on the totality of the facts and circumstances within this Affidavit, the reasonable inferences therefrom, and Your Affiant's training, experience, and knowledge of the investigation, Your Affiant has probable cause to believe that on or about January 15, 2026, RAMIREZ committed the Subject Offenses.

Respectfully submitted,



Christopher Potts  
Special Agent, FBI

SUBSCRIBED and SWORN before me,  
by reliable electronic means (via FaceTime and  
box on USAfx) pursuant to Fed. R. Crim. P. 41(d)(3),  
on January 28, 2026

  
DULCE J. FOSTER  
United States Magistrate Judge  
District of Minnesota

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 26-mj-95 (DJF)

UNITED STATES OF AMERICA, ) Sealed Under LR 49.1(d)  
)  
Plaintiff, ) GOVERNMENT'S PETITION TO  
) SEAL DOCUMENTS  
v. )  
JOSE ALBERTO RAMIREZ, )  
)  
Defendant. )

The United States, pursuant to LR 49.1(d), hereby respectfully petitions this Court for an Order authorizing the sealing of certain documents in the above-entitled matter. The United States respectfully requests that the Court authorize the sealing of the Complaint, Arrest Warrants, the Affidavit of Christopher Potts in support thereof, and this Petition to Seal, for a period of six months from the date of the Court's Order, based on the reasons stated herein.

1. This matter involves an ongoing investigation into alleged violations of 18 U.S.C. § 875(c) (transmitting threats to injure another person) arising from alleged threats to injure a federal law enforcement officer and his family members.

2. The Affidavit of FBI Special Agent Christopher Potts, submitted in support of the Complaint, sets forth facts regarding the ongoing criminal investigation and alleged acts and offenses of a specific perpetrator who is wanted for probable cause to believe the perpetrator committed the offenses alleged.

3. The warrant documents presented to this Court for *in camera* review include detailed investigative information of the alleged offenses and witness(es),

victim(s), and potential evidence. Premature disclosure of the information could jeopardize the ongoing investigation into the alleged criminal offenses and potentially the privacy of individuals who may ultimately not be indicted.

4. Nondisclosure of the documents is necessary to prevent the ongoing investigation from being compromised and for the safety of officers conducting the investigation and who will be effecting the arrest of the defendant. Immediate public filing of the warrant documents would, among other things, compromise details about the nature, extent, and scope of the investigation; hinder post-execution investigation into the criminal acts described in the supporting Affidavit, including the pursuit of leads developed as a result of executing the warrant itself; and alert targets known and unknown about the nature, extent, and scope of the investigation. Compromising the pursuit of alleged criminal activity during the active investigative stage would also provide witnesses, subjects, and targets, known and unknown, an opportunity to conceal or destroy evidence or otherwise obstruct the investigation, change patterns of behavior, notify potential co-conspirators, flee the jurisdiction, ascertain other likely targeted places to be searched, and/or seek to intimidate or retaliate against individuals whom they believe, erroneously or not, are cooperating with law enforcement.

5. The documents also contain identifying information of, and circumstances relating to, an individual or individuals allegedly involved in criminal activity in some way who may not be indicted in this case. Nondisclosure of the documents at this stage is also necessary to protect their identity and/or to minimize

the substantial risk that revelation of details set forth in the documents could cause to their reputation.

6. The Court's supervisory power to prevent disclosure of its files, especially for a limited period of time, is well established, and has been recognized by the United States Supreme Court and the Eighth Circuit. *See Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978); *In re Search Warrant for Secretarial Area Outside Office of Gunn*, 855 F.2d 569, 574 (8th Cir. 1988).

For all the foregoing reasons, the United States respectfully requests that the Court grant its Petition to Seal Documents and order that the Complaint, Arrest Warrants, the Affidavit of Christopher Potts in support thereof, and this Petition to Seal, be sealed for a period of six months from the date of this Court's Order, or until July 28, 2026, whichever is later.

Dated: January 28, 2026

Respectfully submitted,

DANIEL N. ROSEN  
United States Attorney

BY: /s/ Benjamin Bejar  
BENJAMIN BEJAR  
Assistant United States Attorney  
District of Minnesota  
Attorney ID No. 351131

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 26-mj-95 (DJF)

UNITED STATES OF AMERICA, )  
Plaintiff, ) ORDER GRANTING  
v. ) GOVERNMENT'S PETITION TO  
JOSE ALBERTO RAMIREZ, ) SEAL DOCUMENTS  
Defendant. )

This matter is before the Court on the Government's Petition to Seal Documents in the above-captioned matter. Based on all the records, files, and proceedings before the Court, the Court being otherwise fully informed of the premises, and good cause having been shown, **IT IS HEREBY ORDERED THAT:**

1. The Government's petition to seal documents is **GRANTED**;
2. All documents filed in the above-captioned matter, including the Complaint, Arrest Warrant, the Affidavit of Christopher Potts in support thereof, and the Government's Petition to Seal, shall remain sealed until July 28, 2026, or a later date if so granted by a further Order of this Court.

Dated: January 28, 2026



DULCE J. FOSTER  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MINNESOTA