

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kyle Wagner

Case No. 26-30053

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 date(s) of January 29, 2026, in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2261A(2)

Cyberstalking.

18 U.S.C. § 875(c)

Interstate Communications.

This criminal complaint is based on these facts:

See attached affidavit.

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 3, 2026City and state: Detroit, MI*Complainant's signature*Rudy S. Lara, Special Agent*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Rudy S. Lara, being duly sworn, hereby declare and state as follows:

TRAINING AND EXPERIENCE

1. I am a Special Agent with Immigration and Customs Enforcement (“ICE”) – Homeland Security Investigations (“HSI”) and have been so employed since September 2008. I am currently assigned as a Special Agent (“SA”) to the Special Agent in Charge in Dallas, Texas, and have personally investigated numerous cases involving narcotics (cocaine, methamphetamine, and heroin), bulk currency, and firearms. While assigned to the HSI Dallas Gang Unit, I conducted Title III and Racketeer Influenced and Corrupt Organizations Act (RICO) / Violent Crimes in Aid of Racketeering Activity (VICAR) investigations. I am currently on temporary assignment to the Special Agent in Charge, St. Paul, Minnesota. I am authorized and assigned to investigate violations of federal laws, including 18 U.S.C. § 2261A(2) (Cyberstalking) and 18 U.S.C. § 875(c) (Interstate Communications).
2. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7) and I am

authorized by law to conduct investigations and to make arrests for felony offenses.

PURPOSE OF AFFIDAVIT

3. This affidavit is submitted for the purpose of establishing probable cause in support of the attached criminal complaint and issuance of arrest warrant against KYLE WAGNER for a violations of 18 U.S.C. § 2261A(2) (Cyberstalking) and 18 U.S.C. § 875(c) (Interstate Communications). This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review of reports, written materials, and multiple recordings. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

PROBABLE CAUSE

4. Kyle WAGNER is a Minneapolis resident and a self-identified Antifa member who has demonstrated a persistent and

escalating opposition to ICE operations, including conspiring and threatening to assault federal law enforcement officers with the intent to impede, intimidate, or interfere with ICE operations in Minneapolis. Over the last few months, through social media, WAGNER has publicly denounced ICE agents, repeatedly referring to them as “aggressors,” the “gestapo,” and “murderers.” His social media posts actively encourage his followers to impede, intimidate, and interfere with ICE operations through direct action—urging others to forcibly confront, assault, impede, oppose, and resist federal officers.

5. In January 2026, HSI began reviewing WAGNER’s historical social media posts, including content from his Facebook account (Kyle Wagner) and his Instagram accounts (@kaos.follows) and (@antifa.kaos). During this review, HSI identified multiple posts that show escalating threats directed against federal law enforcement, including ICE agents, and WAGNER’s involvement in a conspiracy to assault, impede, resist, or injure federal law enforcement officers and injure their property to molest, interrupt, hinder, or impede their ability to discharge their official duties.

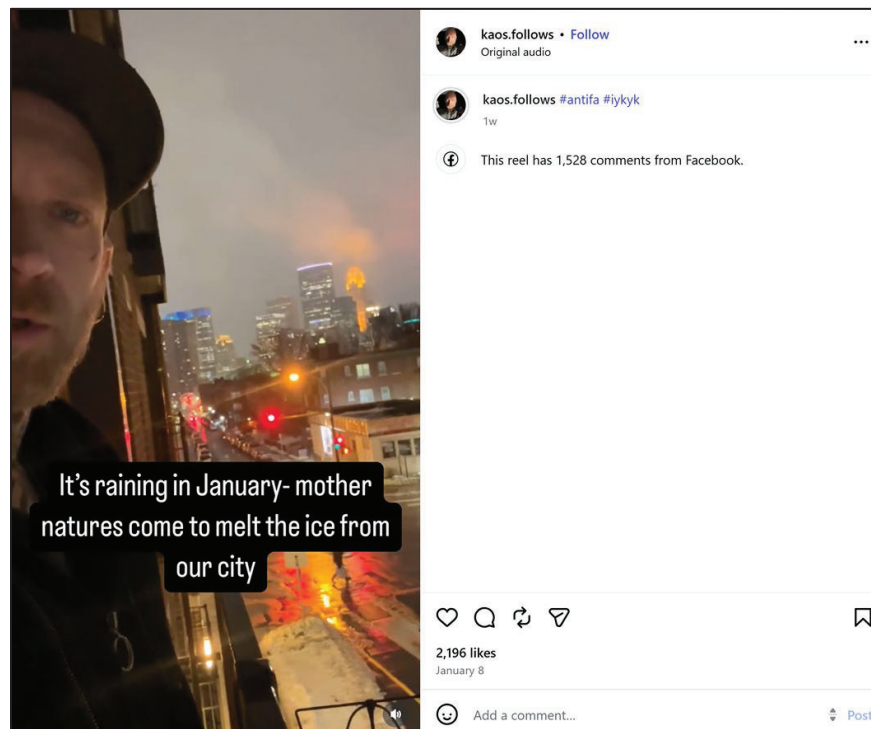
6. Additionally, on January 29, 2026, on WAGNER’s Instagram

account (@antifa.kaos), WAGNER doxxed a pro-ICE individual, J.S., by publishing a phone number, birth month and year, and address in Oak Park, Michigan. In the same post, WAGNER threatened J.S. WAGNER later admitted that he doxxed J.S.'s parents' house.

7. The following posts from January 2026 demonstrate WAGNER's intent to impede, intimidate, or interfere with ICE operations and federal officers in the performance of their official duties in Minneapolis and the surrounding area. WAGNER used social media to engage with conspirators to impede or injure federal officers. WAGNER also used social media to solicit others to engage in a crime of violence, namely, to assault a federal officer with a deadly or dangerous weapon. The review of WAGNER's social media activity revealed a series of posts that show his efforts to mobilize others to take direct action against federal officers. The following examples illustrate WAGNER's intent to forcibly impede, intimidate, injure, or interfere with ICE agents while engaged in their official duties:

- **January 8, 2026 – Instagram (@kaos.follows):**

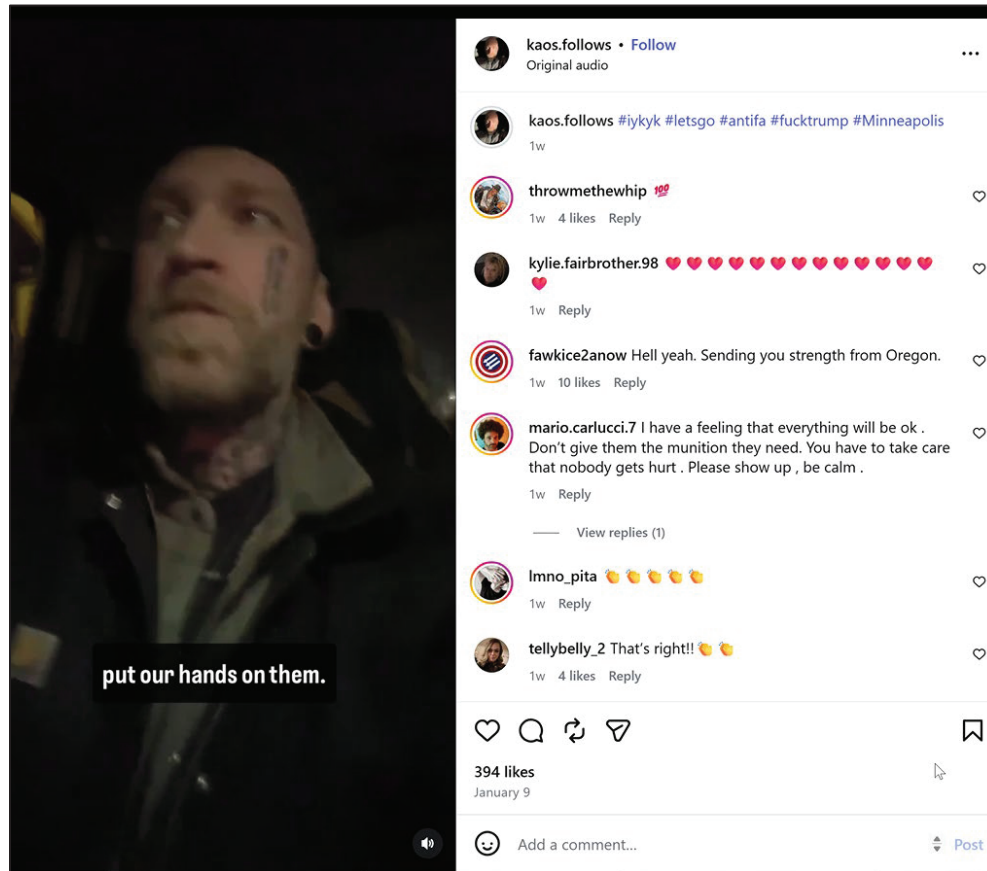
WAGNER posted a video directly threatening ICE agents by stating, *“I’ve already bled for this city, I’ve already fought for this city, this is nothing new, we’re ready this time, ICE we’re fucking coming for you.”*



- **January 9, 2026 – Instagram (@kaos.follows):**

WAGNER encouraged his followers to take direct action against ICE, posting, *“The ICE bunk houses in West End and around the Twin Cities are constant harassment of ICE and we need to continue that, but we also need to cripple them.”* WAGNER then advocated for physical confrontation, stating, *“Anywhere we have*

an opportunity to get our hands on them, we need to put our hands on them.”



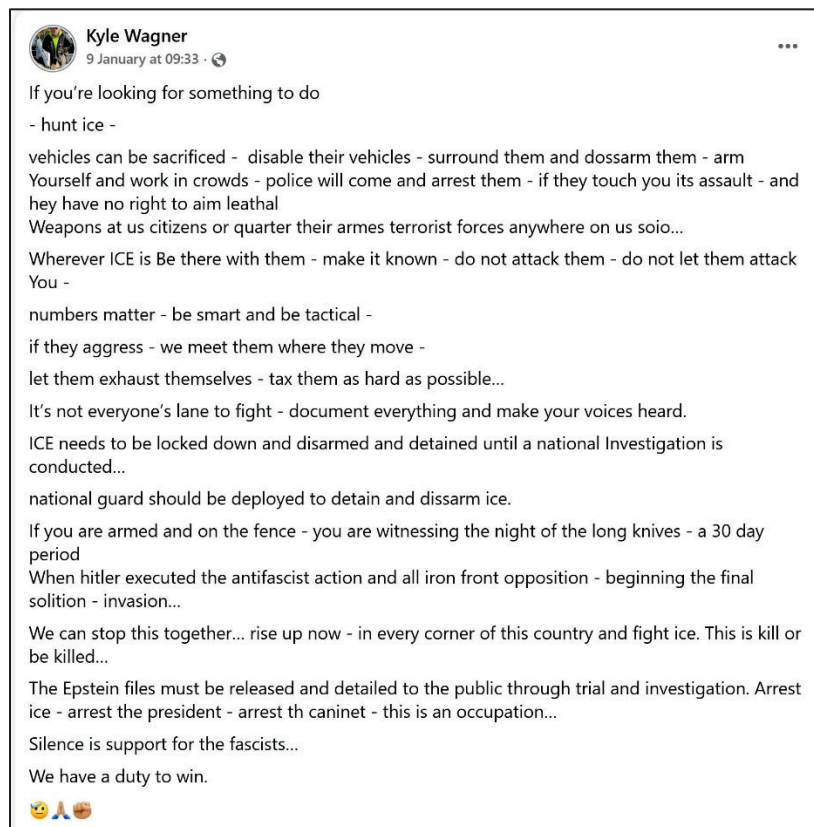
WAGNER explained that Minneapolis is going to be the first state to *“stand its f----- ground. We’re not about to be overrun by a bunch of want-to-be Nazis cosplaying like they’re f----- military.”*

In another video that day, WAGNER explained that things were at an *“inflection point, and it is very much up in the air how this all plays out.”* WAGNER described what the *“next 30 days are going to look like.”* He also provided instructions in the caption for

targeting ICE and their property: “If you’re looking for something to do - hunt ice - vehicles can be sacrificed - disable their vehicles- surround them and disarm them - arm yourself and work in crowds - police will come and arrest them-if they touch you its assault- and he have no right to aim lethal weapons at us citizens or quarter their armes terrorist forces anywhere on us soio... (sic) Wherever ICE is Be there with them - make it known - do not attack them - do not let them attack You - numbers matter - be smart and be tactical - if they aggress - we meet them where they move - let them exhaust themselves - tax them as hard as possible... It’s not everyone’s lane to fight - document everything and make your voices heard. ICE needs to be locked down and disarmed and detained until a national Investigation is conducted... national guard should be deployed to detain and dissarm (sic) ice. If you are armed and on the fence - you are witnessing the night of the long knives – a 30 day period when hitler executed the antifascist action and all iron front opposition - beginning the final solition (sic) - invasion... We can stop this together... rise up now - in every corner of this country and fight

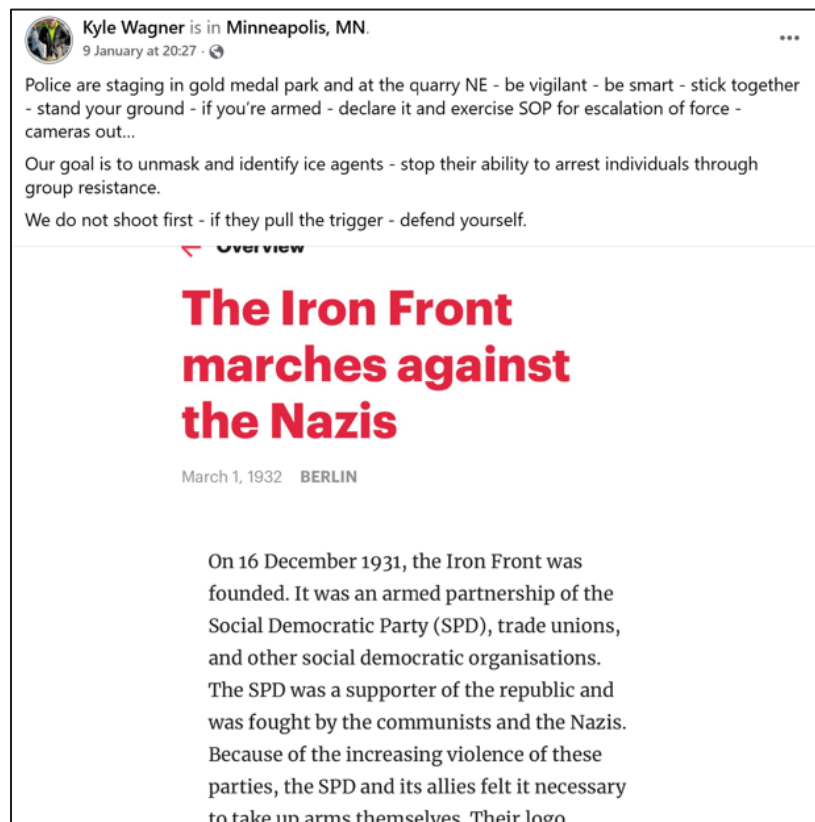
ice. This is kill or be killed... The Epstein files must be released and detailed to the public through trial and investigation. Arrest ice - arrest the president - arrest th caninet (sic) - this is an occupation... Silence is support for the fascists... We have a duty to win.”

WAGNER posted the same message on his Facebook account (Kyle Wagner):



In another video, WAGNER posted a screenshot about the Iron Front march against the Nazis, and added the caption, “Police are

staging in gold medal park and at the quarry NE - be vigilant - be smart
- stick together - stand your ground - if you're armed - declare it and
exercise SOP for escalation of force - cameras out... Our goal is to
unmask and identify ice agents - stop their ability to arrest individuals
through group resistance. We do not shoot first - if they pull the trigger
- defend yourself.”



- **January 10, 2026 – Instagram (@kaos.follows) and Facebook (Kyle Wagner)**

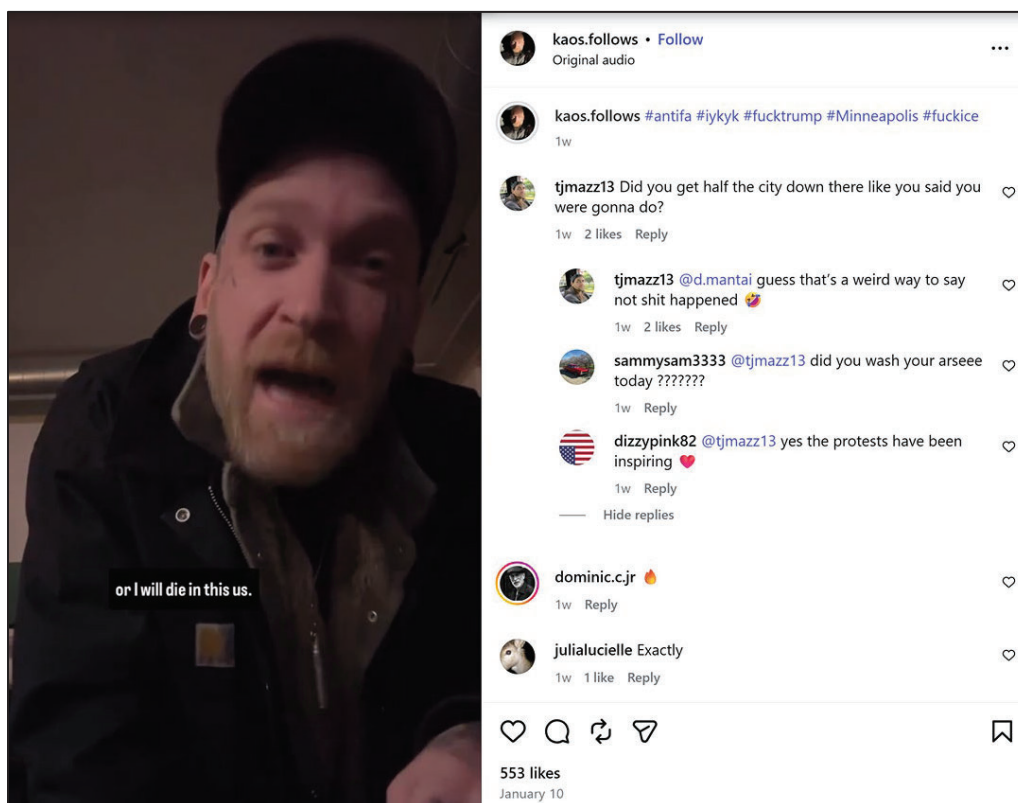
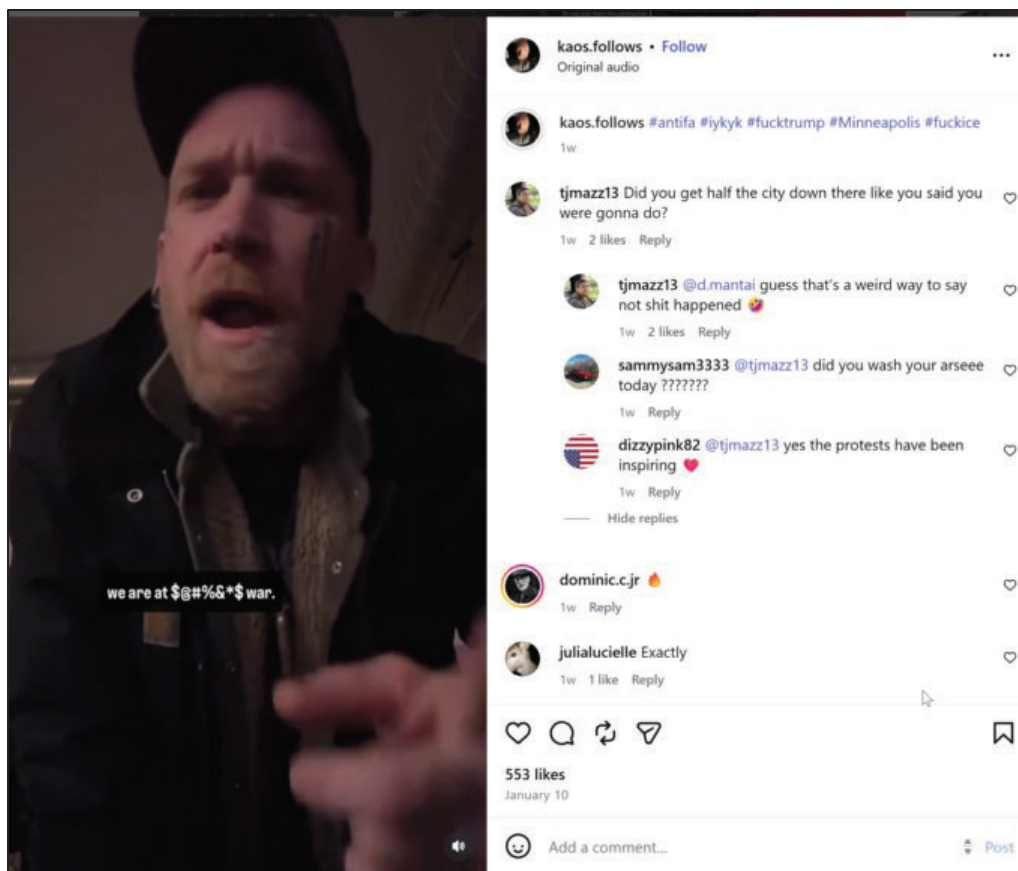
WAGNER posted a video, explaining that people are trying to

“portray it like this is just chaos. It’s not. It’s a lot of fun. It’s

actually really well organized.” WAGNER then directed his followers to different areas of Minneapolis, explaining, “anywhere there’s ICE, you can go have some fun. And it’s actually working quite well because now they’re sending us more troops[.]”

WAGNER urged, “Get out on the streets. Have some f----- fun. Keep your heads. We’re not the violent ones. Go take their f----- masks off and take their f----- guns.”

That same day, WAGNER posted another video, explaining that his earlier video was about “*survival*.” He continued, “*I posted that video because we are at f----- war. This is a war for our f----- souls right now.*” He explained, “*I am going to stay in this fight to the bitter end. So, either we’re going to win, or I will die in this process.*”



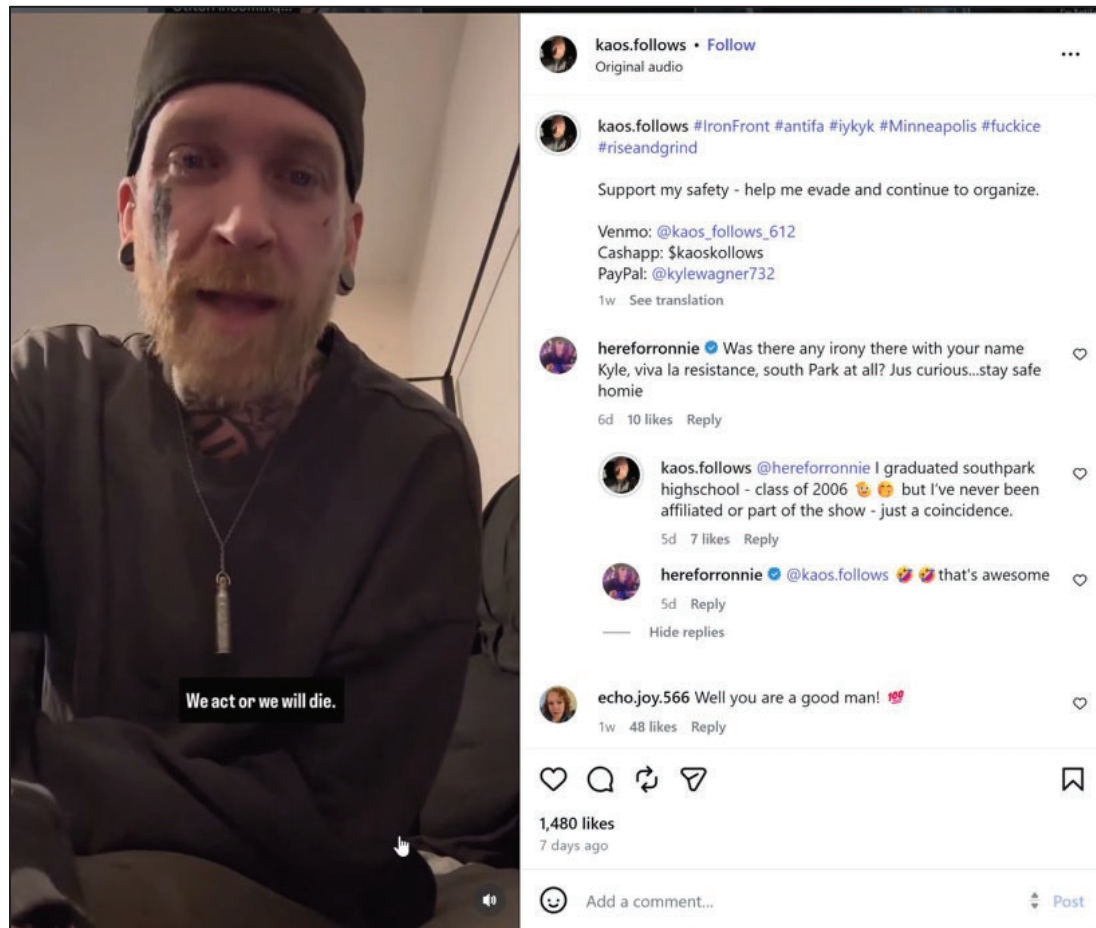
That same day, on Facebook, WAGNER shared a video of the officer-involved shooting of Renee Good with the caption, “Watch it as many times as you need. If you side with the gunman. We’re coming for you too.”



- **January 12, 2026 – Instagram (@kaos.follows):**

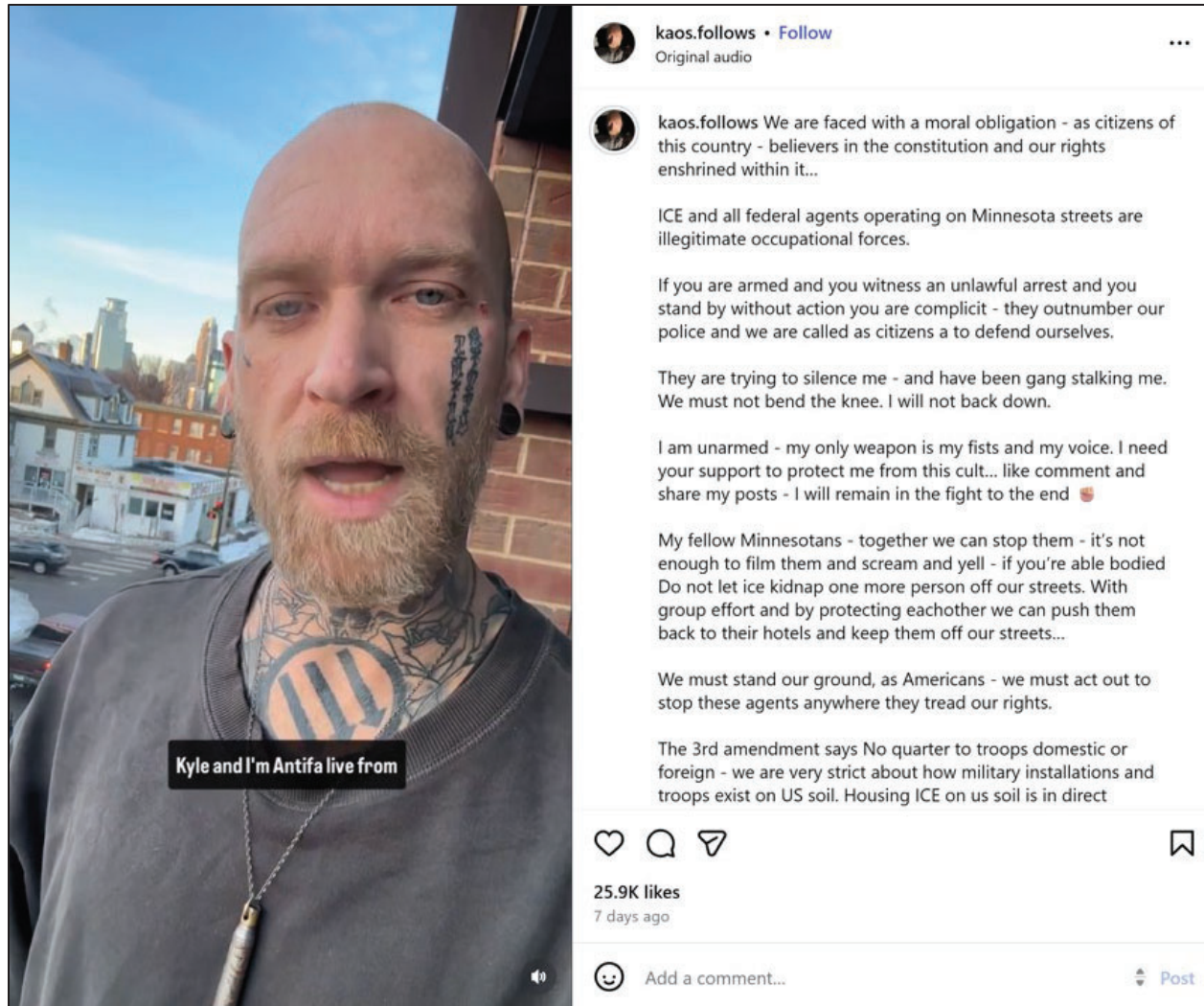
WAGNER posted a video update. In the caption, he asked for his followers to “[s]upport my safety – help me evade and continue to organize.” WAGNER listed his Venmo, Cashapp, and Paypal accounts. He urged fellow “patriots” to “protect [our country] from fascism.” He compared the situation in Minneapolis to the Iron Front, who opposed the Nazi regime in Germany and was

executed. He urged, “*We act or we will die.*”



WAGNER posted another video, with a caption that explained, “We are faced with a moral obligation” and described “ICE and all federal agents operating on Minnesota streets [as] illegitimate occupational forces.” WAGNER continued, “If you are armed and you witness an unlawful arrest and you stand by without action you are complicit - they outnumber our police and we are called as citizens a (sic) to defend ourselves. I am unarmed - my only

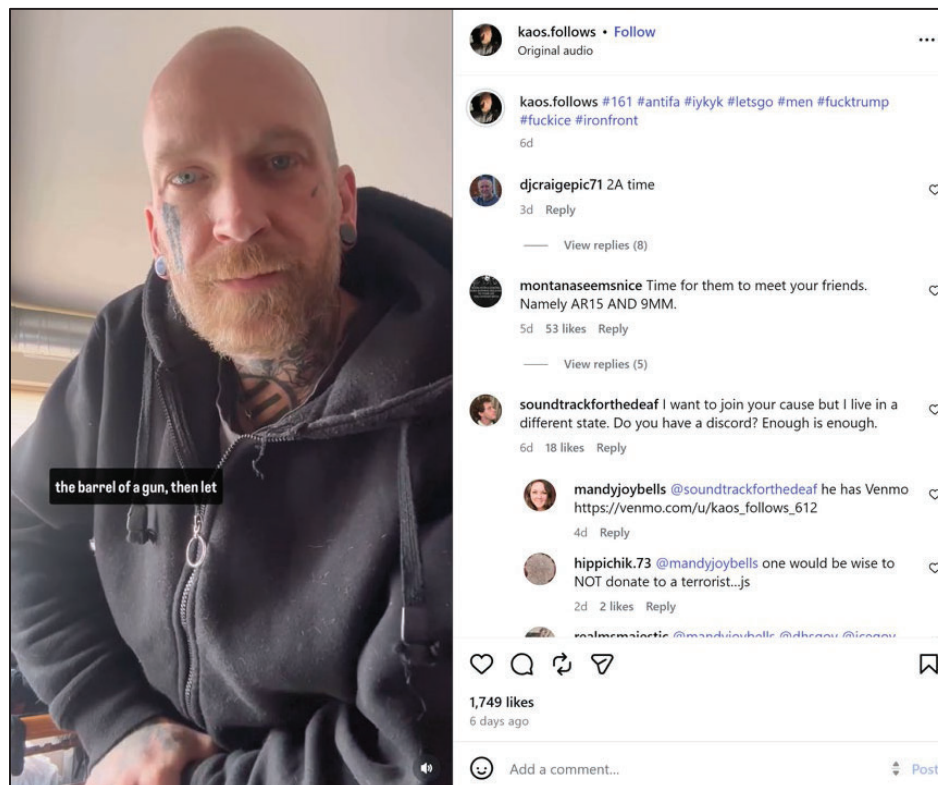
weapon is my fists and my voice. I need your support to protect me from this cult... like comment and share my posts – I will remain in the fight to the end 🇺🇸 My fellow Minnesotans - together we can stop them - it's not enough to film them and scream and yell - if you're able bodied Do not let ice kidnap one more person off our streets. With group effort and by protecting eachother (sic) we can push them back to their hotels and keep them off our streets... We must stand our ground, as Americans - we must act out to stop these agents anywhere they tread our rights." During the video, WAGNER explained, "*We are at an inflection point here. This week is important.*" He described 1,500 more ICE agents coming to Minneapolis; "*we found them checking into hotels all over the city.*" He explained the "*castle doctrine,*" encouraging "*every armed citizen, you have a choice to make whether you allow this to stand in our community or not. We are the Iron Front. It is an ideology.*"

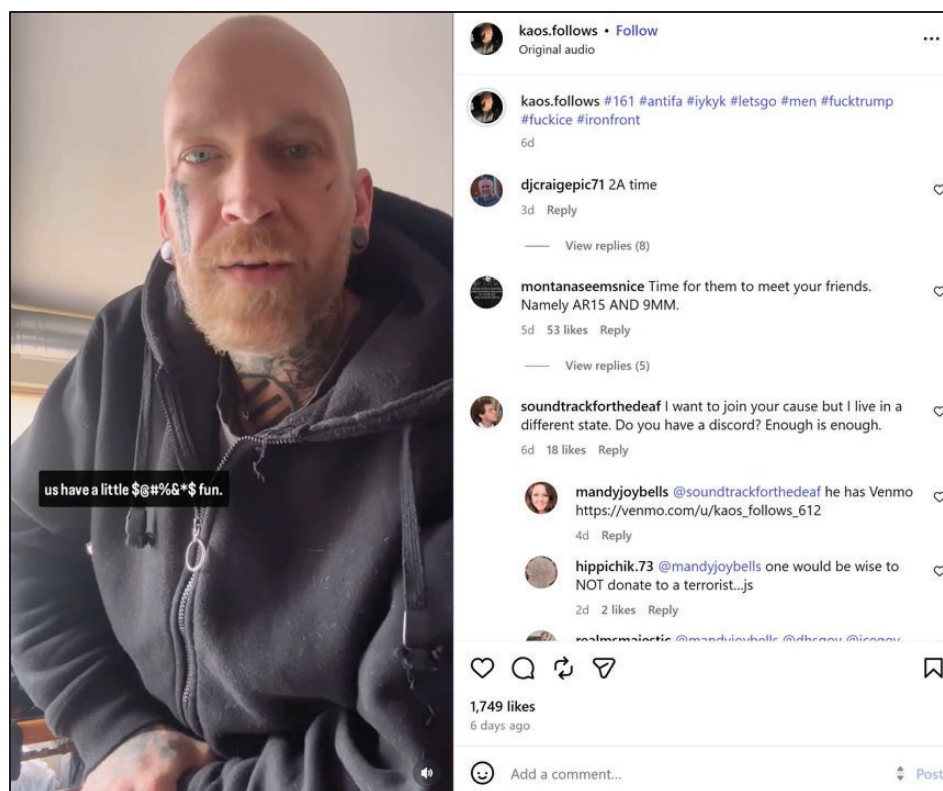


- **January 13, 2026 – Instagram (kaos.follows):**

WAGNER posted a video, explaining, “*We are under occupation, and we are fighting back with every tool we have at our disposal. That has been extremely effective, and we have pushed ICE so hard that they have doubled their size and they have increased the severity of their tactics in an attempt to scare us into submission.*” He stated, “*This is where ICE has come to die.*” WAGNER then

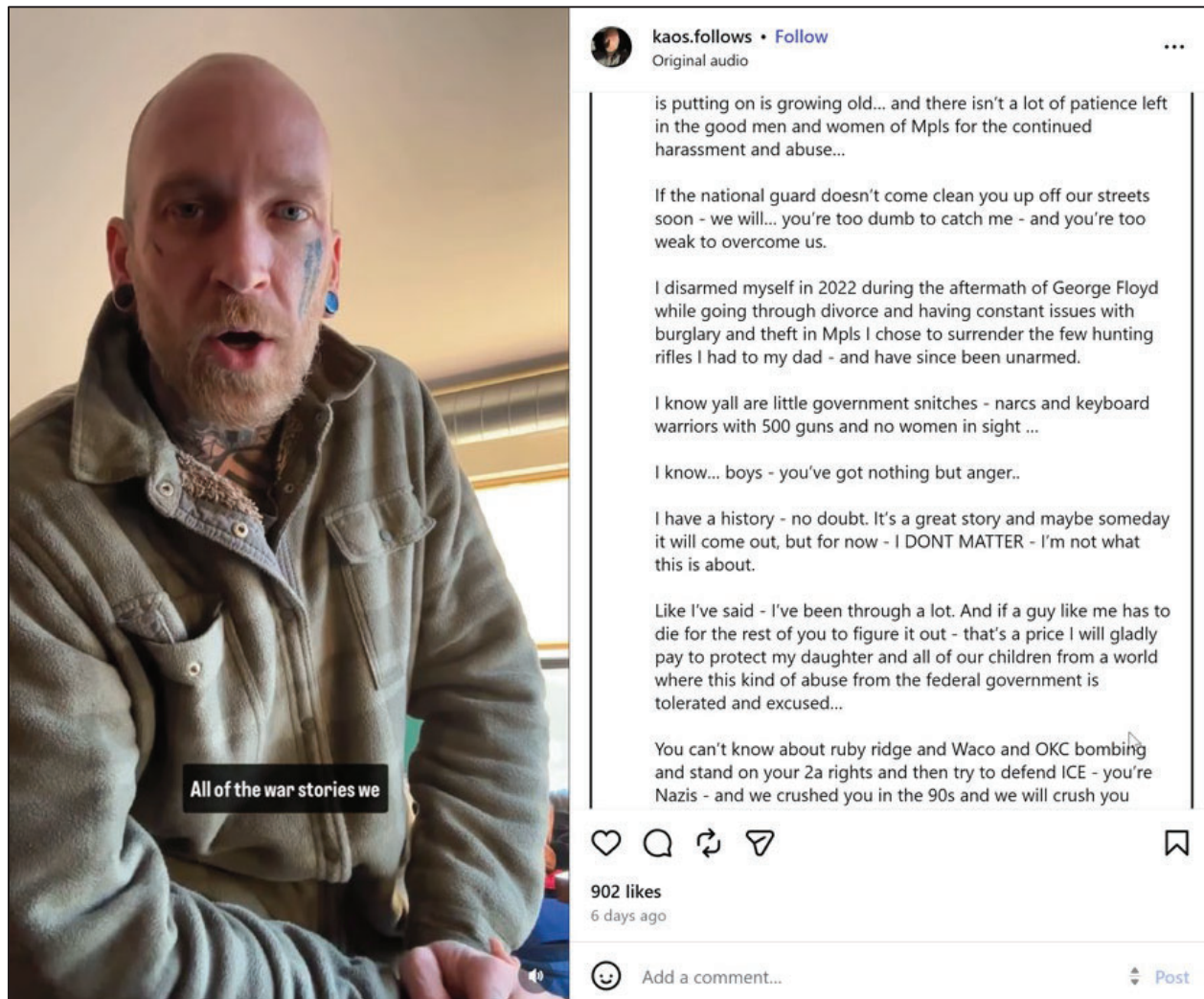
threatened ICE agents, *“We want to know who they are. We will identify every single one of them and we will prosecute them to the fullest extent of the law. If that has to be done at the barrel of a gun, then let us have a little f----- fun.”* An Instagram user commented on the video, explaining that the user wanted to join WAGNER’s “cause[,]” and another Instagram user responded with WAGNER’s Venmo account. A different Instagram user commented, “Time for them to meet your friends. Namely AR15 and 9MM.”





In another video, WAGNER referenced the “*doxxing that’s going on[,]*” and explained that he is “*keeping the peace out of respect for my community. Not out of respect for you. I have been asked politely not to escalate this situation. Lord knows I want to. And if you keep f----- around, I’m going to. But right now, I am politely holding the line as I have been asked to.*” In the caption, he wrote, “If the national guard doesn’t come clean you up off our streets soon - we will...” He later wrote, “Like I’ve said - I’ve been through a lot. And if a guy like me has to die for the rest of you to figure it out - that’s a price I will gladly pay[.]” He ended the caption, “You can’t know about ruby ridge and

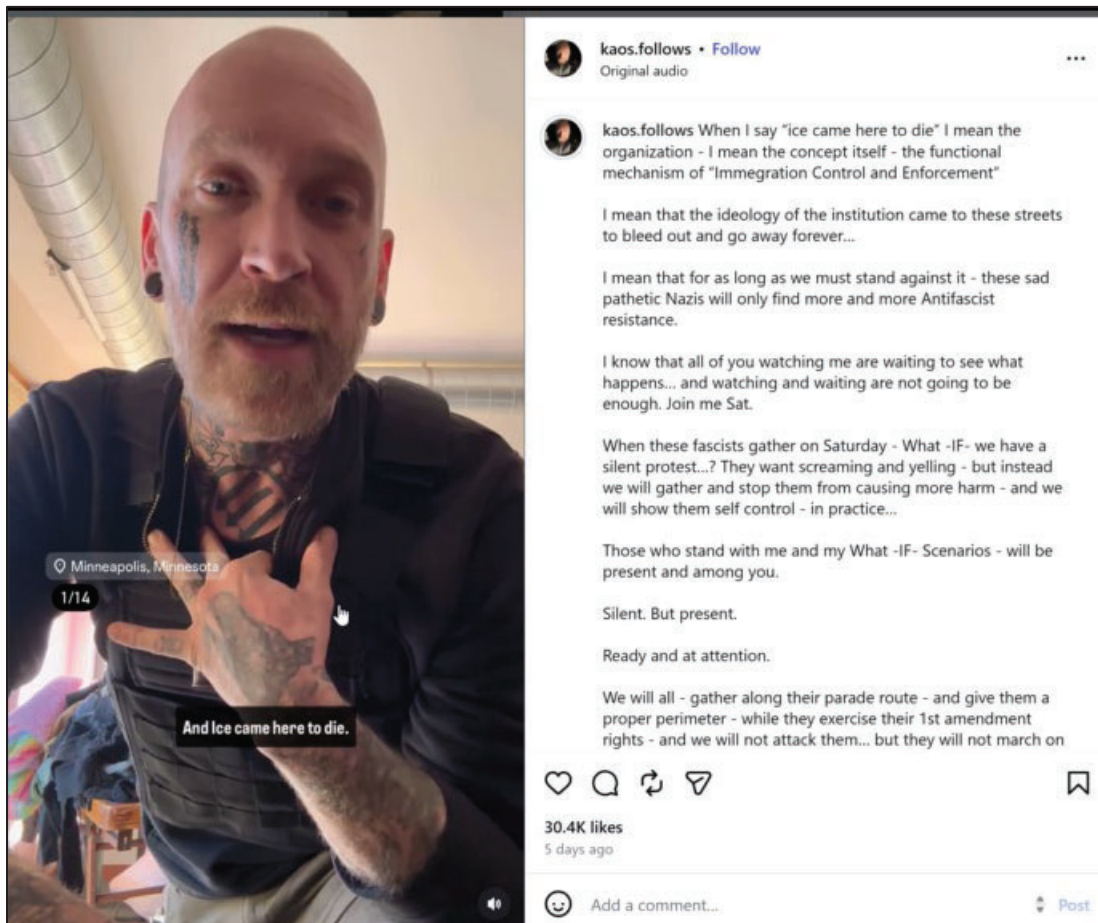
Waco and OKC bombing and stand on your 2a rights and then try to defend ICE - you're Nazis - and we crushed you in the 90s and we will crush you[.]”



- **January 14, 2026 – Instagram (@kaos.follows):**

In a video, WAGNER, wearing a bullet-proof vest, encouraged his followers to join him on Saturday to oppose a pro-ICE rally, explaining that “*every armed Minnesotan is going to be there.*”

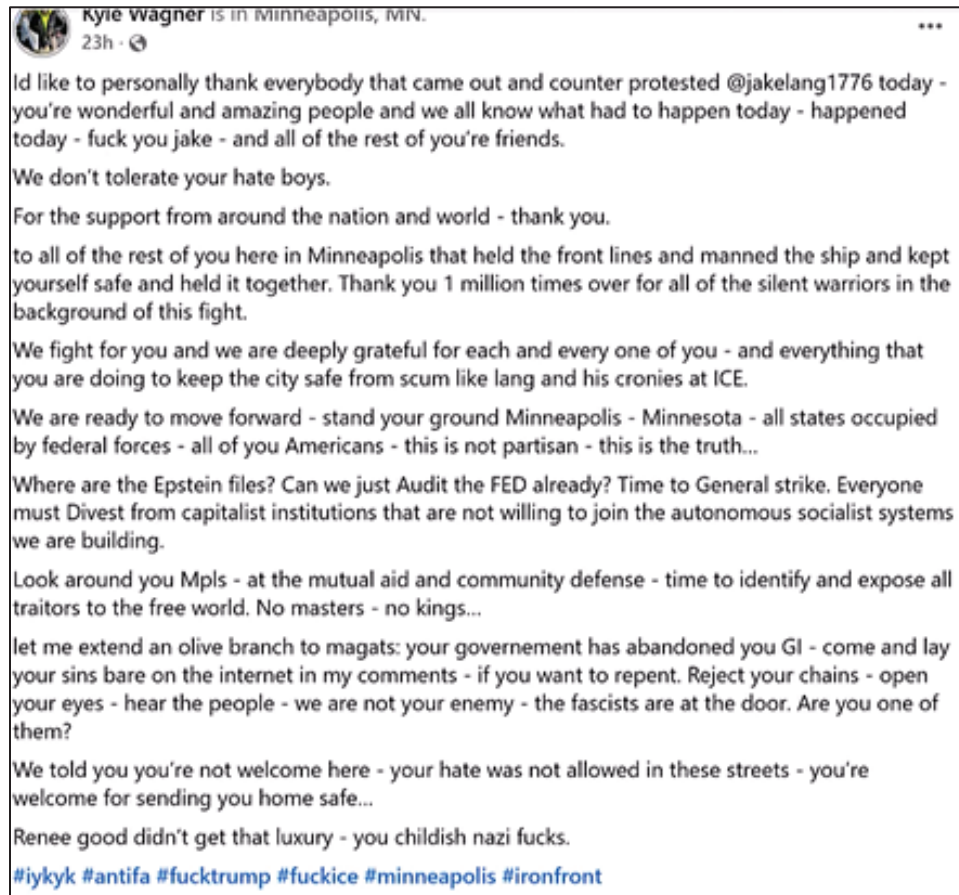
WAGNER explained that his followers who stand with what he is “preaching” and “stand with armed defense of this city. Saturday the 17th you need to be on the streets.” He continued, “this fascism will not be allowed on our streets.” He finished the video stating, “ICE came here to die.”



- **January 17, 2026 – Facebook (Kyle Wagner)**

After a pro-ICE rally in Minneapolis, WAGNER posted a Facebook video where he explained, “I want to make one thing very clear and

this is going to be directly to all of the rest of the Nazis that were around for this, okay? You'll see in this video I was right there, and I let Jake Lang go." WAGNER also posted this caption:



- **January 18, 2026 – Instagram (@kaos.follows):**

WAGNER posted an Instagram story, describing a pro-ICE individual's fundraising, and wrote, "I'm fundraising for others mutual Aid networks and spending my resources fighting back and organizing the direct action that's getting us results... If you can't be here and want to see us take the fight to them - give me

your support and help us Stop Ice now. My link is in my bio - fund community protection and anti-ICE direct action.

#vivalaresistance.”



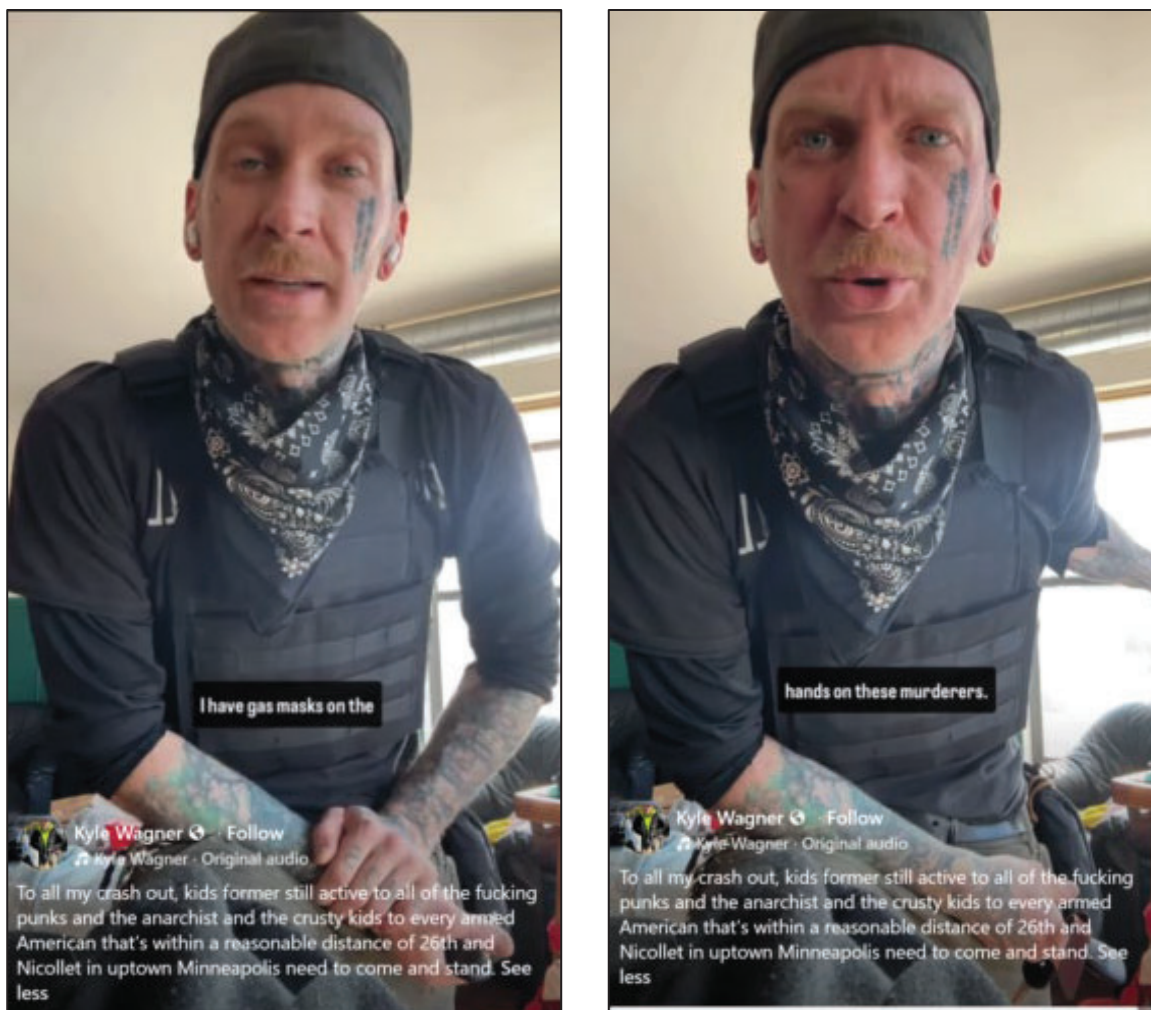
- **January 24, 2026 – Facebook (Kyle Wagner) and Instagram (@kaos.follows):**

After an officer-involved shooting on January 24, 2026, WAGNER posted several videos on social media. WAGNER shared an Instagram story showing the January 24, 2026 officer-

involved shooting. In the video, WAGNER advocated for violent resistance against ICE. WAGNER stated, *“I am Kyle. I am Antifa. And they just shot another f----- peaceful observer literally five f--- blocks away from here. In my neighborhood, just like they shot Renee fourteen blocks away over there. And I’ve been saying this. And it’s not okay.”* WAGNER continued, screaming, *“But it needs to be said. You can’t march and bang drums and sing songs when they’re shooting people in the f----- head. Go and f----- fight them. Or shut the f--- up and die for them.”*



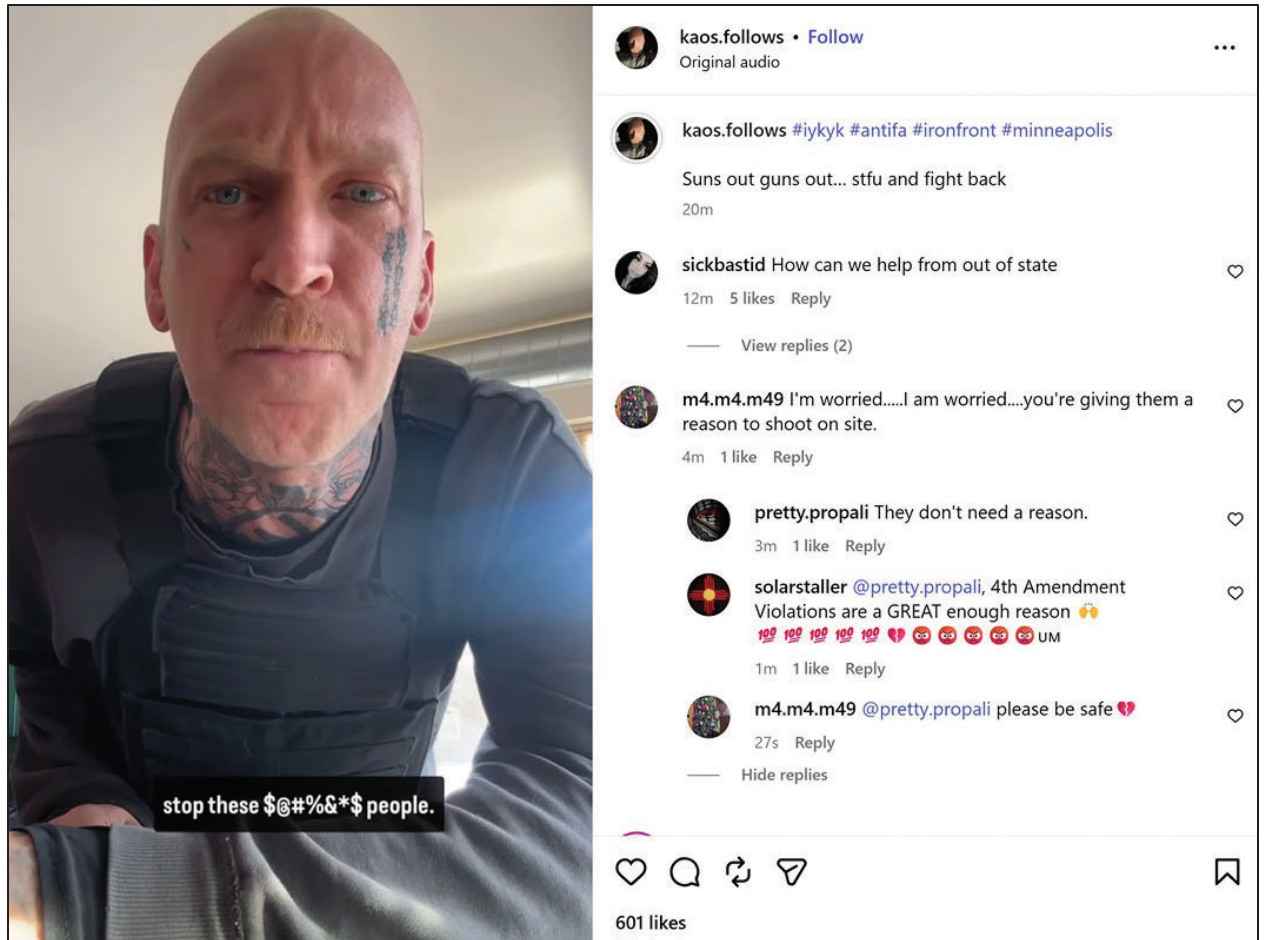
Later that day, WAGNER posted a video to Facebook while wearing a bullet-proof vest. WAGNER included the caption, “To all my crash out, kids former still active to all of the f----- punks and the anarchist and the crusty kids to every armed American that’s within a reasonable distance of 26th and Nicollet in uptown Minneapolis need to come and stand.” During the video, WAGNER explained that the *“messages started flooding in to say that I was needed front lines right away.”* WAGNER stated, *“I have my truck on standby. I have gas masks on the ground there, as much as I could deliver. I have people en route. If you’re seeing this video, we’re done with peaceful protests now. The gloves come off and ICE needs to get out. Run for the hills, boys.”* WAGNER stated, *“I have repeated myself ad nauseum to a (sic) deaf ears of cowards and b----made little f--- boys that want to f----- talk about their f----- feelings instead of putting hands on these murderers.”*



The same day, WAGNER posted another video to Instagram showing WAGNER wearing a bullet-proof vest and directing his followers to bring guns to the location of the officer-involved shooting. WAGNER explained that he was “*Antifa*,” and “*there was so much rage in me that I’ve had to record this like fifteen times trying to get the message out. They f----- up, okay? Go watch my other videos. It doesn’t matter if you’re not here and you’re not caught up. You missed the f-----*”

fight. But if you are, it's time to suit up. Boots on the ground. Nicolette and f----- 26th. My house is four blocks away. Anywhere between Franklin and Nicolette, and 26th and Nicolette, show up ready to go. Okay, no, not talking about peaceful protests anymore. We're not talking about having polite conversations anymore. I am talking specifically to my f----- followers, this is everything I have f----- talked about. This is exactly what I said was going to happen. This is exactly what I said was going to f----- come when we didn't f----- go and march on f----- Whipple with guns. Sorry but welcome to America 2026 where the Second Amendment is the only thing that's going to keep you f----- protected from literal f----- Nazi gun men that are killing innocent people in the street with impunity. This is not a f----- joke. There's nothing fun to chant about it. Get your f----- guns and stop these f----- people."

WAGNER captioned the video, "Suns out guns out... stfu [shut the fuck up] and fight back[.]" Several Instagram users commented on the video. One Instagram user commented, "How can we help from out of state[?]" Another user commented, "Collab? I'm about to try and head your way. Working on child care now. Coming from Madison wisco[.]"



- **January 26, 2026 - Instagram (@antifa.kaos):**

WAGNER posted from a new Instagram account, explaining, “*My name’s Kyle. I’m Antifa. And I’m back. They pulled everything I’ve ever f----- put on the Internet off the Internet today like I never f----- existed... The fight is well and alive. We have pushed ICE to leave this city in droves. We have made our voices heard. Viva la resistance.*”

The same day, WAGNER reposted a video that showed a pick-

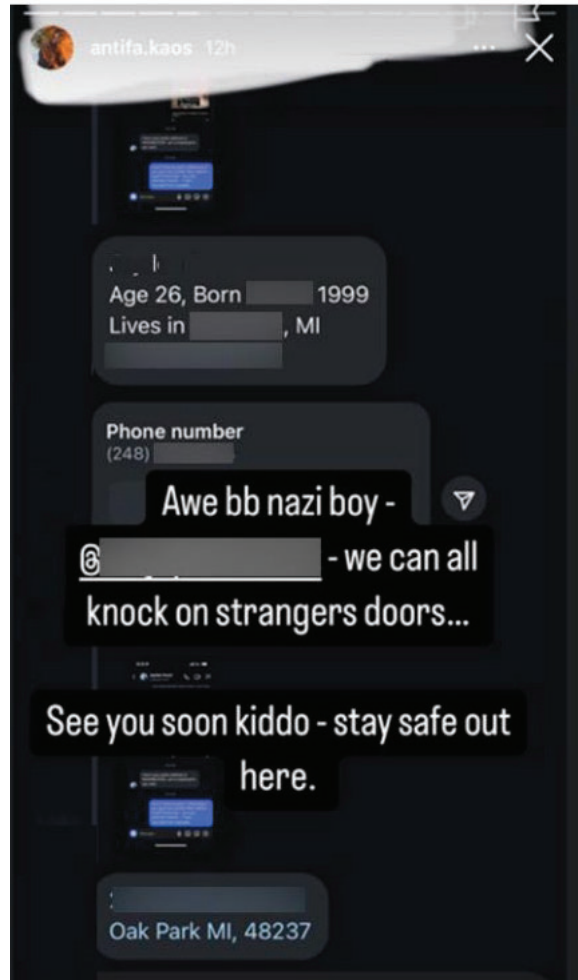
up truck pulling up to a crowd. WAGNER got out of the truck and asked, “*Who needs a gas mask?*” WAGNER then pulled out a box of gas masks and began to pass them out, explaining that he has “*like 30 of them.*” He also passed out shields, stating, “*the shields and shit in the truck is free to grab.*” The video is captioned, “Power to the people” with hashtags #minneapolis #antifa #iykyk #fuckice #fucktrump #ironfront.



- **January 27, 2026 – Instagram (@antifa.kaos)**

WAGNER posted a video applauding the success of the agitators' impeding of ICE and federal agents in Minneapolis. WAGNER stated, *"I'm Kyle. I'm Antifa. Welcome to Minneapolis. Got rid of Bovino yesterday. Also sent a lot of ICE agents packing. It's working people. The pressure is getting results."*

8. Additionally, WAGNER used his Instagram account (antifa.kaos), which is an electronic communication system of interstate commerce, to place J.S. in reasonable fear of death or serious bodily injury, or to cause, attempt to cause, or would reasonably expect to cause, J.S. substantial emotional distress. In the January 29, 2026 post, WAGNER listed J.S.'s full name, birth month and year, phone number, and address—doxxing J.S. while calling him a "bb nazi boy[.]" WAGNER also threatened, "we can all knock on strangers doors... See you soon kiddo – stay safe out here."



9. In another video from January 29, 2026, WAGNER explained that he doxxed J.S.'s parents' address and J.S.'s phone number. WAGNER then discussed fighting J.S. in a cage fight.

10. Based on my training and experience, these posts, authored and controlled by WAGNER, show that WAGNER used Instagram with the intent to kill, injure, harass, intimidate, or place under surveillance with the intent to kill, injure, harass, or intimidate J.S., which caused, attempted to cause, or would reasonably be expected to cause,

substantial emotional distress to J.S. WAGNER also transmitted in interstate commerce a communication containing a threat to injure J.S.

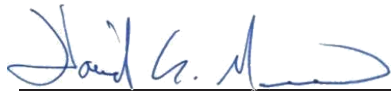
CONCLUSION

11. Based on the foregoing, I have probable cause to believe, and I do believe, that WAGNER has committed the following crimes: 18 U.S.C. § 2261A(2) (Cyberstalking) and 18 U.S.C. § 875(c) (Interstate Communications).



Rudy S. Lara
Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence and/or by reliable electronic means.



HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

DATED: February 3, 2026