

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
26-mj-23 (DLM)

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF TIMOTHY G. SCHANZ
COUNTY OF RAMSEY)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Timothy G. Schanz, being duly sworn, do hereby state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the United States Department of Justice, Federal Bureau of Investigation (FBI), and have been assigned to the Minneapolis Field Office Violent Crime Squad for the specific purpose of assisting in criminal investigations pertaining to violations of 18 U.S.C. § 111, Assaults, Impeding or Interfering with Federal Law Enforcement Officers, in the state of Minnesota. I have completed the FBI Academy and been employed with the FBI as a Special Agent since 2016. Prior to the FBI, I was employed as a Police Officer since 2007. In my time as a law enforcement officer, I have investigated numerous assaults to include interfering, assaulting or intimidating a law enforcement officer during the official performance of their duties.

2. This Affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant for Alfredo Alejandro ALJORNA (YOB 1999) (ALJORNA) and Julio Cesar SOSA-CELIS (YOB 2001) (SOSA-CELIS) for aiding and abetting forcibly assaulting, resisting, opposing, impeding, intimidating, and interfering with a federal law enforcement officer and

involving physical contact with the officer, in violation of Title 18, United States Code, Sections 2, and 111 (a)(1).

3. This Affidavit is based on my personal knowledge, information I have learned from other law enforcement officers, and my review of written material or other evidence obtained by the FBI and other law enforcement agencies during the ongoing investigation of this matter. Because this Affidavit only includes information believed to be sufficient to establish probable cause for the sought after criminal complaint and arrest warrants, this Affidavit does not include all the details and information known to me and the government regarding this investigation.

FACTS SUPPORTING PROBABLE CAUSE

4. At approximately 6:00 pm on January 14, 2026, Deportation Officers with the Immigration and Custom's Enforcement (ICE) Enforcement and Removal Operations (ERO) were conducting ERO enforcement operations in or around Minneapolis, Minnesota. Two ERO Agents, hereafter referred to as ERO #1 and ERO #2 were part of a larger out-of-state ERO team temporarily assigned to the enforcement detail in Minneapolis. As a result, neither ERO Agent was familiar with the Minnesota area. The two ERO Agents were riding together in an unmarked ERO vehicle equipped with emergency lights and a siren. ERO #1 was driving the unmarked vehicle, and ERO #2 was riding as the front-seat passenger. ERO #1 was wearing a tactical belt with his badge, firearm and equipment, and ERO #2 was wearing overt body armor with law enforcement markings, to include "POLICE," placed across his chest.

5. While running publicly visible license plates through ICE databases, the ERO Agents ran a silver/grey Ford Focus with Minnesota license plate RXB619, hereafter SUBJECT VEHICLE. Based on the information returned from the ICE databases, the ERO Agents learned that the registered owner of SUBJECT VEHICLE was Joffre Stalin Paucar BARRERA (YOB 1991), and they believed the subject they observed driving SUBJECT VEHICLE was BARRERA, the registered owner. The physical description of BARRERA is approximately 35 years old, 5'2, 128 pounds with short brown hair. ICE database checks indicated that BARRERA, the registered owner, was illegally in the United States because BARRERA was not a citizen of the United States and had no record of crossing a legal port of entry.

6. As part of the ERO enforcement operations, ERO #1 initiated a traffic stop on SUBJECT VEHICLE by activating the unmarked vehicle's emergency lights and siren and attempting to pull the vehicle over. At that point, SUBJECT VEHICLE fled from ERO at a high-rate of speed, and a vehicle pursuit ensued. The unmarked ERO vehicle pursued the SUBJECT VEHICLE with lights and sirens for what ERO estimated was 15 to 20 minutes. The SUBJECT VEHICLE recklessly zig-zagged through traffic and tried to lose the ERO vehicle. The ERO Agents, who were not familiar with the area, lost track of the exact location of SUBJECT VEHICLE during the pursuit, until the SUBJECT VEHICLE hit a light pole near the 600-block of North 24th Avenue in Minneapolis, MN. The ERO Agents then observed the driver and lone occupant, a male subject later identified as ALJORNA, get out of the SUBJECT VEHICLE and run to the vicinity of what was later identified as an

apartment building located at 6xx North 24th Avenue, Minneapolis, MN 55411, hereafter SUBJECT RESIDENCE. ALJORNA's physical description per his driver's license is 5'7, 172 pounds with short brown hair and is approximately 26 years old.

7. Your Affiant reviewed driver's license photographs of BARRERA, the SUBJECT VEHICLE's registered owner, and of ALJORNA, and both individuals' license photographs appear similar in nature and physical appearance.

8. ERO #1 exited the unmarked ERO vehicle and chased ALJORNA on foot, while ERO #2 stayed with the unmarked vehicle. ERO #1 told FBI Agents investigating the matter that ERO #1 gave ALJORNA commands in both English and Spanish to stop running, and identified himself as an ICE Agent, as he chased ALJORNA toward the SUBJECT RESIDENCE. ERO #1 saw a separate Hispanic male standing on the porch at the front of the SUBJECT RESIDENCE. (During a post-Miranda custodial interview with SOSA-CELIS, it was determined he was the individual standing on the porch.) SOSA-CELIS yelled to ALJORNA in Spanish to run faster. As ALJORNA ran, he slipped and fell on the ground, and ERO #1 caught up to and grabbed ALJORNA, attempted to detain him, and began tussling with him on the ground. ERO #1 and ALJORNA were approximately six feet from the front door steps, which are approximately ten feet from the front door of the SUBJECT RESIDENCE. ERO #1 then saw SOSA-CELIS (the Hispanic male on the porch) grab a red-handled broom, and SOSA-CELIS began hitting ERO #1 with the red-handled broom stick, while yelling at ERO #1 something to the effect of, "Let him go." ERO #1 stated that he felt the broom stick hitting him in his face. ERO #1 did not have any

protection such as a helmet, and he stated that he felt pain as he was being struck with the broom stick by SOSA-CELIS. ERO #1 then saw who he believed was a third Hispanic male approach with a snow shovel, and this male also began striking ERO #1 with the snow shovel. The area near the SUBJECT RESIDENCE had poor or sporadic lighting, and ERO #1 had difficulty seeing the assailants.

9. As ERO #1 continued to tussle with ALJORNA to try to detain ALJORNA, ALJORNA wiggled out of his shirt or sweater and freed himself of ERO #1's grasp. As ERO #1 lost his grip and hold of ALJORNA, ERO #1 called out for ERO #2 to assist ERO #1, but ERO #1 then realized that ERO #2 was not with ERO #1, and that ERO #1 was in fact alone, in the dark, facing the males. ERO #1 estimated that at this point he had been fighting/tussling with ALJORNA for about three minutes, was exhausted, alone, on the ground, and in fear of his safety.

10. As ALJORNA broke free from ERO #1, he stood up and looked back at ERO #1 with an angry scowl on his face. SOSA-CELIS then passed the broom to ALJORNA, and ALJORNA then attempted to hit ERO #1 in the face or head with the broom stick. ERO #1 was still laying on his back on the ground and used his left hand to shield his head from the blows of the broom strikes from ALJORNA. ERO #1 told FBI Agents that he was struck repeatedly by the broom, and he used his left hand to block a strike that caused a cut or gash to the palm of his hand. Your Affiant reviewed a photograph of ERO #1's hand showing a bloody gash that is consistent with this injury. While blocking the strikes with his left hand, ERO #1 struggled to draw his service pistol with his right hand and pointed it in the direction of his assailants. As