

STATE OF MINNESOTA )

) ss.

COUNTY OF ~~HENNEPIN~~ →

Ramsey

1. I am employed by the Department of Homeland Security (DHS) Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) and have been so employed since March 2020. I graduated from the Criminal Investigator Training Program (CITP) on November 18, 2020, and Homeland Security Investigations Special Agent Training (HSISAT) on February 27, 2021. Both were located at the Federal Law Enforcement Training Center (FLETC), located at Glynco, Georgia. During that time, I completed training in surveillance, search and arrest warrants, federal laws enforced by HSI, and federal criminal procedures. Prior to my tenure as a Special Agent, I was a United States Border Patrol agent for nine (9) years where I attended and graduated the Border Patrol Academy at (FLETC) in Artesia, NM. In my professional experience, I have conducted multiple criminal investigations for federal violations including, but not limited to, narcotics smuggling, sex trafficking, possession and production of child sexual abuse material, and assaults of federal officers.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Alice VALENTINE for assaulting, resisting, or impeding certain officers in violation

of Title 18, United States Code, Section 111(a).

3. 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 recordings. This affidavit does not include all of the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

### **PROBABLE CAUSE**

4. At approximately 11:00 a.m. on January 12, 2026, Enforcement Removal Operations (ERO) conducted a targeted immigration operation at 3429 3<sup>rd</sup> St. N. in St. Cloud, MN. ERO Executive Associate Director (EAD) Marcos Charles and Deputy EAD Thomas Brophy were riding together in a government vehicle and assisted the targeted immigration enforcement operation. EAD Marcos and Deputy EAD Brophy were dressed in their ERO uniforms with clearly marked law enforcement markings.

5. EAD Marcos and Deputy EAD Brophy parked their government vehicle in an attempt to prevent anyone else from entering the parking lot that could impede or interfere with the targeted immigration enforcement operation. In the parking lot of the targeted enforcement operation there were approximately 60-80 protestors, approximately 20 of whom were within 20 feet of EAD Marcos and Deputy EAD Brophy.

6. EAD Marcos and Deputy EAD Brophy exited their vehicle to assist

with crowd control and were immediately confronted by Alice VALENTINE. VALENTINE yelled something to the effect of “Get the Fuck Out” and blocked Deputy EAD Brophy’s path. Deputy EAD Brophy pushed VALENTINE out of his path. VALENTINE kicked Deputy EAD Brophy in the left leg which resulted in a cut on Deputy EAD Brophy’s left shin with minimal bleeding. VALENTINE was placed in handcuffs and arrested for violation of Title 18, United States Code, Section 111. After officers placed VALENTINE in a transport van, VALENTINE attempted to get out. Deportation Officer (DO) Alvarez put her hand out, at which point VALENTINE said something to effect of “fuck you stupid bitch” and spat in DO Alvarez’s face.

### CONCLUSION

7. Based on the information set forth above, there is probable cause to believe that the Defendant, Alice VALENTINE, violated Title 18, United States Code, Section 111(a), assaulting, resisting, or impeding certain officers.

Further your Affiant sayeth not.

  
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Bronson D. Day  
Special Agent, HSI

SUBSCRIBED and SWORN before me  
by reliable electronic means via FaceTime  
and email pursuant to Fed. R. Crim. P. 41(d)(3) on  
January 20, 2026



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DOUGLAS L. MICKO  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MINNESOTA