

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Timothy Gerber, being duly sworn, hereby declare and state as follows:

TRAINING AND EXPERIENCE

1. I am a Special Agent (SA) with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI), and have been so employed since March of 2025. In my capacity as a Special Agent, I am responsible for conducting investigations into the federal laws enforced by HSI. Since March of 2025, I have investigated various criminal violations relating to child exploitation, assaults on federal officers, human rights violations, and immigration violations.

2. I am a graduate of the Federal Law Enforcement Training Center (FLETC), HSI Special Agent Training Program, having completed training in surveillance, search and arrest warrants, federal laws enforced by HSI, and federal criminal procedures. Prior to my tenure as a HSI Special Agent, I was employed as a Special Agent with the Internal Revenue Service, Criminal Investigation (IRS-CI), where I investigated various criminal violations relating to the Internal Revenue Code, money laundering, digital currency, and elder exploitation.

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 warrants against NEKIMA VALDEZ LEVY-ARMSTRONG a/k/a “Nekima Valdez Levy-Pounds,” CHAUNTYLL LOUISA ALLEN, WILLIAM SCOTT KELLY a/k/a

“DaWokeFarmer,” [REDACTED], [REDACTED]
 [REDACTED], [REDACTED], [REDACTED], and
 [REDACTED] (“collectively, “Defendants”), and other currently
 unknown persons, for a violation of 18 U.S.C. §§ 241 (Conspiracy Against Rights
 Secured by Federal Law, namely, the free exercise of religion at a place of religious
 worship secured by the FACE Act, 18 U.S.C. § 248(a)(2)), and 248(a)(2) (FACE Act).

4. 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.

FACTS ESTABLISHING PROBABLE CAUSE

A. Summary

5. On the morning of Sunday, January 18, 2026, at approximately 10:30
 a.m., a group of approximately 30-40 agitators, working together in a coordinated
 manner, entered the Cities Church, located at 1524 Summit Avenue, St. Paul, MN
 55105, during a religious service and engaged in conduct that, *as detailed below*,
 disrupted the religious service and intimidated, harassed, oppressed, and terrorized
 the parishioners, including young children, and caused the service to be cut short

and forced parishioners to flee the church out of a side door, which resulted in one female victim falling and suffering an injury. Statements made by agitators at the church indicated that they targeted the church based on their belief that one of the church's pastors is a federal immigration officer (Victim #1). Prior to their assault on the church, the agitators met together in the parking lot of a nearby shopping center and made plans for their actions inside the church. Some of the protestors also physically obstructed some parishioners as they attempted to leave the church and the adjacent parking areas. Some of the agitators, including [REDACTED] [REDACTED] [REDACTED] livestreamed the agitators at the pre-assault meeting and the conduct of the agitators inside the church and after disrupting the church service.

6. Special Agents with DHS-HSI and the Federal Bureau of Investigation ("FBI") commenced an investigation. The following facts set forth information learned during the investigation.

B. January 18, 2026: Livestreamed Video of Incident at Cities Church

7. On Sunday morning, January 18, 2026, at approximately 10:00 a.m., [REDACTED] began livestreaming [REDACTED] [REDACTED] in the parking lot of a shopping center located at 1440 University Avenue W, St Paul, MN 55104. I have reviewed pertinent portions of the livestream video. I used the YouTube closed-captioning option to assist with transcriptions.

1. Pre-Operation Meeting

8. At the start of the livestream, ██████ said he just got into Minneapolis, Minnesota and was there to speak with an organization that was gearing up for resistance and protest. Based on my training and experience, I am informed that persons identifying themselves as resistance protesters have recently sought to disrupt ICE operations in Minnesota. Due to the presence of an American flag, ██████ noted, apparently in jest, that he initially thought the protesters looked “MAGA-coded,” but he explained to his audience that the organization was, in fact, a group of resistance protesters.

9. ██████ explained that the resistance protesters were planning an operation that ██████ intended to follow them on. ██████ identified their operation as “Operation Pullup” and identified the apparent organizer as NEKIMA VALDEZ LEVY-ARMSTRONG (“ARMSTRONG”), a/k/a “Nekima Valdez Levy-Pounds.” When speaking with ARMSTRONG, ██████ assured her that, “We’re not saying what it is, what’s going on, but thank you. Tell us why you’re doing this.”

10. ARMSTRONG identified herself as a civil rights attorney and longtime activist in the community. ARMSTRONG said she does activism and protests in various ways. ARMSTRONG identified this as “Operation Pullup,” which she characterized as a “clandestine” operation. ARMSTRONG explained that she and other agitators “show up somewhere that is a key location, [where the targets] don’t expect us to come there, and we disrupt business as usual. That’s what we’re about to go do right now. We’ve had a lot of success with the times we’ve done “Operation

Pullup.” ARMSTRONG detailed prior protests and stated “this is our next action to call for justice for Renee Good and ICE out of Minnesota. [REDACTED] asked, “How long do you think before this operation would [inaudible] before it takes place?” ARMSTRONG replied, “We got to go now and get there.” [REDACTED] replied, “we’ll see you there.” [REDACTED] advised his audience that “we’re going to head to the operation. Again, we’re not going to give any, any of the information away.”

11. [REDACTED] introduced [REDACTED], who said he was out there to support the community activists. [REDACTED] identified himself as a current candidate for Minnesota State Senate, District 65. [REDACTED] felt it’s important if you’re servicing people in office, you have to be with the people as well. (Based on my review of other video evidence of the agitators’ activities inside the church, [REDACTED] later entered the church as part of the group’s action.)

12. [REDACTED] walked away from [REDACTED] to focus his attention on the other agitators and a chant that CHAUNTYLL LOUISA ALLEN (“ALLEN”) was leading. ALLEN’s initial chants were, “This is what community looks like” and “ICE out.” ALLEN then directed the agitators to respond with “of Minnesota” when she said, “ICE out.” ALLEN requested the favorite chants of the local agitators, one suggested “justice for Renee Good (Good).” (Good was recently involved in an illegal protest to disrupt immigration enforcement activities, which led to an officer-involved shooting as a result of her assault on an immigration officer.) ALLEN proceeded to lead the group in that chant, as well as “say her name,” which the agitators responded with “Renee Good.”

13. ALLEN described their reasoning for being out at the staging location, stating they have a “duty to fight for our freedom,” “we have a duty to win,” “we must love and support one another,” “we have nothing to lose but our chains.” ALLEN then stated to the agitators “you guys are sounding like Sunday morning.” ALLEN continued to address the crowd in a motivational manner. ALLEN instructed the agitators to “stay bumper-to-bumper, make sure everybody gets through the light, and we all have the address, right?”

14. ARMSTRONG addressed the agitators and encouraged everyone to make sure they had the address. ARMSTRONG also provided the following instruction: Remember if you have anything that is activist identifying, do not wear it in if you’re just going in to sit down and be a part of the situation. In response to a question from an unidentified agitator, who asked if they should spread out once at the church, ARMSTRONG instructed that the agitators should not sit together. ARMSTRONG further instructed the agitators that, if you have anything activism identifying, do not go in with the first wave, you wait until you come in with us people of color.

15. [REDACTED] proceeded to move the camera away from the agitators and organizers because, as he explained, he did not want to divulge critical information about the operation that was being discussed at that time. [REDACTED] went to the crowd of agitators and organizers and proceeded to thank them for allowing him to be there.

16. Based on my review of [REDACTED] livestream, I know that defendant WILLIAM SCOTT KELLY (“KELLY”) a/k/a “DaWokeFarmer” was present in the crowd of agitators at the pre-operation briefing led by ARMSTRONG and ALLEN.

17. Based on my review of the livestream video, ARMSTRONG and ALLEN appear to be the leaders of Operation Pullup and the meeting of agitators that was described in paragraphs above. I believe this because ARMSTRONG and ALLEN provided instructions to the group, led chants, and conducted interviews as apparent leaders of the organization.

2. Travel to Cities Church

18. [REDACTED] and [REDACTED]
[REDACTED], along with a rear passenger, Michael LNU (Last Name Unknown), entered a vehicle to depart towards the location of the operation. [REDACTED] asked [REDACTED], the driver, “You know where we’re going, right?” [REDACTED] replied, “yep.”

19. An individual who identified himself as “Mark” approached [REDACTED], thanked [REDACTED], and introduced himself. [REDACTED] advised Mark, “You’re on right now, just so you know. So don’t give anything away.” A short time later, [REDACTED] said, “alright, we’re behind operation, we gotta catch up.” [REDACTED] replied, “Let’s go catch up” and later, advised [REDACTED] and Michael, “Don’t give anything away.”

20. On the drive to the operation location, [REDACTED] advised his audience they are doing a clandestine secret operation. [REDACTED] asked [REDACTED],

“They found out some inside information, right?” [REDACTED] responded, “yeah.” [REDACTED] identified who [REDACTED] is, that he is a producer, and that they met at Essencefest a “couple years ago.” [REDACTED] identified himself as an activist and social entrepreneur.

21. While still on the drive, [REDACTED] stated, “This is just the beginning of this uh clandestine operation that they’re doing here because of some um inside information that they got. So, this is going to be very interesting. I don’t think we can go ahead. I don’t think we can go inside, right? No.” Michael replied, “we can stand outside.” [REDACTED] later stated, “We can’t say too much. We don’t want to give it up.” The occupants of the vehicle discussed going into a church service that is underway with parishioners. [REDACTED] later stated “I’m just trying to figure out what’s the best thing cuz we just found out about this this morning. I’m just trying to figure out if it’s, um, if it’s for me to go inside so I can tell what happened. That’s what I’m gonna do.” Michael responded, “I know I’m also not supposed to really like go in, right?” [REDACTED] responded, “but you can go in,” Michael added, “because they’re going to buy that.”

22. [REDACTED] asked, “Will they let you in with a camera?” [REDACTED] replied, “Put it in your backpack.” [REDACTED] answered, “No, you can’t do that. We can’t do that. We can’t do that.” [REDACTED] asked, “Oh, we can’t?” [REDACTED] replied, “no,” and later stated “let me produce this live as we’re doing this.” [REDACTED] then instructed [REDACTED] “and if there’s a place to turn, I want you to go where and park right where we can see the entrance.” [REDACTED] replied,

“I don’t think that’s the main entrance going on.” [REDACTED] replied, “yeah, it’s right there.” [REDACTED] replied, “Oh, where people are walking down those stairs.”

3. Conduct at Cities Church

23. As [REDACTED] approached Cities Church, [REDACTED] advised Michael to “stay on the sidewalk, you can probably come where the van is.” Based on the video, it appears [REDACTED] was referring to a red vehicle parked in front of Cities Church. During [REDACTED] livestream, the camera focused on the outside of Cities Church, and [REDACTED] entered only with audio equipment. The audio captures what appears to be the church’s pastor in the midst of addressing his congregation during a religious service.

24. Approximately one minute and forty-seven seconds after [REDACTED] entered Cities Church, an unknown female voice, interrupted the pastor sermon and shouted, “Excuse me, pastor...” [REDACTED] is then heard saying, “Hey, Meta record.” Based on my training and experience, Meta refers to smart glasses that integrate augmented reality features, allowing users to interact with digital content seamlessly. While the cameraman remained outside, the audio recording captures the voices of agitators yelling in the church.

25. At one point, an unknown female refers to the Director of ICE. Agitators can also be heard yelling, “Justice for... Renee Good.” Approximately thirty-five seconds later, [REDACTED] is observed on video entering Cities Church. Immediately after [REDACTED] enters Cities Church, the video shows multiple parishioners exiting Cities Church through multiple doors. Three

unknown parishioners are observed falling to the ground while exiting Cities Church through the north side door. Approximately twenty seconds later, Michael is observed entering Cities Church.

26. [REDACTED] entered Cities Church with his camera recording [REDACTED] live broadcast. Based on my review of the video, it appears that the parishioners are confused and shocked by the agitators' conduct. Again, based on the video, agitators can be heard yelling "ICE out" and blowing whistles. Based on my training and experience, anti-ICE agitators use whistles to disrupt ICE operations and notify others of their presence.

27. During the [REDACTED] broadcast, ARMSTRONG and ALLEN are observed yelling "ICE out." KELLY can also be heard yelling, "This ain't God's house. This is the house of the devil." Based on my review of KELLY's numerous social media posts, I recognize that is KELLY's voice on the video saying those words. [REDACTED] can be observed walking with a winter-style jacket and hood over his head, in what appears to be an attempt to conceal his identity. Several other agitators or parishioners are wearing winter-style jackets with their hoods down.

28. During his livestream, [REDACTED] explained that Operation Pullup learned that one of the pastors for Cities Church is a member of ICE. During his broadcast, [REDACTED] tells his viewers that's he's there "chronicling and reporting. We're not a part of the activists, but we're here just reporting on them."

[REDACTED] is observed engaged in agitator chants, yelling and raising his hands. [REDACTED] stated, "I'm looking at a young man who's in the corner. He's

frightened, he's scared, he's crying. People are leaving church. An unknown male parishioner was observed yelling to the agitators telling them to "get out." [REDACTED] acknowledged that the unknown male parishioner is yelling this. [REDACTED] stated, "I don't think they know what to do. I'm sure they probably called the local authorities right now. People are just really angry and upset and members of the church are trying to get them to calm down." [REDACTED] followed with, "But this is the beginning of what's going to happen here. When you violate people's due process, when you pull people off the street and start dragging them and hurting them and, um, and not abiding by the constitution, when you start doing all of that, people get upset and angry." [REDACTED] goes on to suggest that according to the Constitution, there are no limitations to protesters on where and when they can exercise their Constitutional rights. That's the whole point of it is to disrupt, and that's what they're doing and that's what I believe."

29. While at the church, [REDACTED] interviewed ARMSTRONG, who stated, "I told [inaudible] that Victim 1 is a pastor here and he also serves as a Director of the Field Office for ICE in St. Paul. [REDACTED] asked, "Are you sure that he's...?" ARMSTRONG answered, "Yes, Cities Church, and that's why we're here. We're demanding justice for Renee Good and letting them know that this will not stand. They cannot pretend to be a house of God while harboring someone who is directing ICE agents to wreak havoc upon our community and who killed Renee Good, who almost killed a six-month-old baby. Enough is enough. I am a reverend, on top of being a lawyer and an activist."

30. [REDACTED] asked ARMSTRONG, “Who is the person that we should talk to? Is our pastor or something? ARMSTRONG replied, “He might have ran away.” [REDACTED] replied, “All right, we’ll see if we can find him.” [REDACTED] informed his audience, “I’m going to talk to the pastor. Let’s see if I can talk to him.”

4. [REDACTED] and Other Agitators Corner Pastor in Church

31. [REDACTED] then approached the pastor and began asking him questions. In response to a question from [REDACTED], the pastor (Victim #7) said, “We were interrupted by this group of protesters. We asked them to leave and they, um, obviously have not left. This is unacceptable. This is shameful. It’s shameful to interrupt a public gathering of Christians in worship. [REDACTED] advised the pastor that, “We live in a, there’s a constitution and the First Amendment to freedom of speech and freedom to assemble and protest.” The pastor replied, “We’re here to worship Jesus because that’s the hope of these cities. That’s the hope of the world is Jesus Christ.” [REDACTED] interrupted and then told the pastor, “I want to be very respectful, please don’t push me, though.”

32. In the video, [REDACTED] is standing very close to the pastor. In the livestream, the pastor appears to be worried and distraught about his parishioners, whom he keeps looking at. [REDACTED] continues to distract the pastor with questions. The pastor then stated, “I have to take care of my church and my family. So, I ask that you actually also leave this building. [REDACTED] asked, “You don’t want us to worship?” The pastor replied, “unless you’re here to worship.” [REDACTED] replied,

“I’m always worship[ing]; I’m a Christian.” Approximately thirteen minutes later, [REDACTED] exited the Cities Church.

33. Other video footage shows that, at this point during the incident, the pastor appears to be cornered by [REDACTED], [REDACTED], [REDACTED] [REDACTED] and other unidentified agitators.

C. Facts Obtained From Other Video Footage of Incident

34. I observed other livestream footage taken by another agitator who was inside the Cities Church, when the agitators began their protest. In that video, I observed the pastor standing at the podium with both hands on each side of the lectern in what appears to be an observing stance. During the recording, I am able to hear, “Hands up, don’t shoot.” KELLY is shown standing in front of the lectern with his phone camera pointed at the pastor. The pastor is then shown pointing towards the exit of the church, in what appears to be a gesture to dismiss KELLY.

35. In the video, I also observed a female parishioner in the corner of the church holding two toddlers in a protective way, with what appears to be a look of anxiety and fear on her face. KELLY is also shown in the video engaging with a parishioner in an aggressive, confrontational manner within the parishioner’s personal space. KELLY was yelling at the parishioner, asking multiple questions along the lines of, Why aren’t you involved in the protests? ALLEN is observed leading the agitators in various chants.

D. Review of Cities Church Broadcast Footage & Related Videos

36. Broadcast video obtained from Cities Church shows [REDACTED] chanting with the agitators and punching his fist in the air. He is standing next to ALLEN

at that point in the video. Based on the video footage, it appears that the conduct of [REDACTED], ALLEN, and other agitators is intimidating and physically obstructing some of the parishioners' freedom of movement. I also observed [REDACTED] give ARMSTRONG what appears to be a hug, then engaging in a brief conversation with her while they were both inside to the church.

37. Cities Church broadcast video also showed [REDACTED] present at the protest. A review of open-source social media videos showed [REDACTED] live-streaming the protest, in addition to interviewing ARMSTRONG and the pastor. [REDACTED], [REDACTED], [REDACTED], and other agitators were later seen intimidating and obstructing the pastor's freedom of movement, as noted above.

38. Cities Church broadcast also showed [REDACTED] [REDACTED] present at the protest, recording with his phone, chanting with the agitators, and obstructing parishioners' freedom of movement.

E. Complaints to and Related Information from St. Paul Police Department

39. I have reviewed an Incident Report from the St. Paul Police Department (SPPD) regarding the incident at Cities Church. I learned the following information:

40. According to Officer Jonathan Schroeder, on January 18, 2026, at approximately 10:40 a.m., St. Paul Police Department (SPPD) received multiple calls from parishioners at Cities Church reporting approximately 20-40 individuals disrupting their worship service by chanting and protesting. Shortly after arriving on scene, SPPD Officers observed protesters leaving the building and moving to the

driveway on the west side of the church. The protesters continued to chant for approximately 30 minutes, then left the area. Officers Schroeder learned this protest was happening because one of their pastors is allegedly a Director for ICE. Members of the church's staff requested SPPD to document what happened and said they wanted to press charges if it's possible to identify anyone in the protest.

41. According to SPPD Sergeant Ilya Tereshko, on January 18, 2026, at approximately 10:40 a.m., Officers were dispatched to Cities Church on a call of disorderly conduct where protesters were disrupting church services. Church clergy advised Sergeant Tereshko that their parishioners were shaken up during the incident and many left early due to the protesters. There was also concern that there would be more disruptions in the future as well as vandalism to the building, because of the potential national attention that this incident could get due to the presence of [REDACTED], [REDACTED].

42. According to Sergeant Matthew St. Sauver, he was made aware of a possible protest in the parking lot of a shopping center at Cub Foods, 1440 W University, beginning at approximately 10:00 a.m. At approximately 10:15 am., Sergeant St. Sauver directed a police unit to go to the area and see if the group was there and if they were protesting. A police unit responded and observed the group getting into their vehicles and leaving in a caravan formation, heading southbound on Hamline Street in St. Paul, Minnesota. Sergeant St. Sauver monitored Black Lives Matter MN live stream remotely at <https://www.facebook.com/share/v/17mmiBpk1Y/> and identified the following

individuals on livestream at the protest: [REDACTED] ALLEN, (Member of St Paul School Board), ARMSTRONG, and [REDACTED].

43. According to SPPD Computer Aided Dispatch (CAD) form, Victim 2 broke her arm exiting through the Cities Church office door when proceeding towards Saratoga Street. When Victim 2 came out the door and was running, she slipped and broke her arm. I believe this is documented in [REDACTED] broadcast as described above. Per the report, Victim 2 advised the SPPD that “they were terrorized, our children were weeping, college students and young women were sobbing, it was impactful and it will take time to work through.” (It should be noted the CAD report for this incident states it occurred January 19, 2026, I know the incident occurred on January 18, 2026.)

F. Further Investigation

44. During the course of the investigation, agents discovered a flyer posted on Instagram by “racialjusticemn” and “nekimal,” advertising Operation Pullup, Sunday January 18, 10:00 a.m. sharp, at Cub Foods Parking Lot (Midway Area, St. Paul). Nekimal is ARMSTRONG’s personal Instagram account. Instagram is a social media platform where users are able to post photos and videos. The following photo is a screenshot of the Instagram post posted by “racialjusticemn” regarding Operation Pullup.



G. Interviews of Victim-Witnesses

45. On January 19, 2026, the Federal Bureau of Investigation (FBI) identified and interviewed Victims 4 and 5, both of whom have been members of Cities Church for at least four years and present during the January 18, 2026 protest. I have learned the following from a report of the interview. Victim 5 noticed Cities Church was unusually full and noticed a group of unfamiliar individuals seated together towards the rear of the church. Victim 4 noted after the protest began, approximately fifty members of the congregation were stuck towards the front of the church. Victim 4 informed agents the aisles are already narrow to begin with, and the agitators who occupied the center of the sanctuary made it nearly impossible for parishioners to get out and leave. Victim 5 later expressed

fear that the agitators may have guns underneath their jackets. Additionally, when the agitators began shouting, all the parishioner could hear was “shoot.”

46. Victim 4 informed agents that members of their parish attempted to retrieve their children from the childcare area located downstairs, but the agitators were blocking the stairs, and the parents were unable to get to their children. Victim 4 recalled one agitator was threatening, aggressive, and intimidating towards parishioners. Additionally, this agitator was screaming and getting in people’s faces, to include women and young children. This agitator continued to scream in the faces of young children while they were crying.

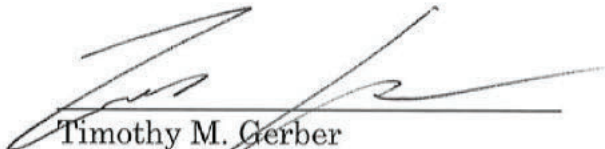
47. On January 19, 2026, Homeland Security Investigations (HSI) and Federal Bureau of Investigations Special Agents interviewed Victim 6 regarding the incident that took place at Cities Church on January 18, 2026. I’ve learned the following from a report of the interview. Victim 6 was joined by his wife, Victim 2, and their children. Victim 6 recalled an African-American woman yelling “EXCUSE ME PASTOR, EXCUSE ME PASTOR, do you know you're harboring ICE Agent [victim 1]?” Victim 6 recalls protesters everywhere in the aisles chanting “[victim 1 out!]” Victim 6 thought to himself that this is what it would feel like to be in a mass shooting. Victim 6 described the events as surreal and could not believe what was happening. Victim 6 recalled people shouting and running, children crying, as well as people singing and praying. Victim 6 recalled KELLY screaming “Nazi” in

people's faces, in addition to confronting children saying, "do you know your parents are nazis, they're going to burn in hell."

48. Victim 6 was scared the agitators were not going to let people leave and that they were going to harm victim 1's family for harboring victim 1. Victim 6 later stated protesters followed and surrounded them in their car and would not let them leave. Victim 6 informed agents that their face is on the Cities Church website, and they are afraid people will try and come to their house at night. Victim 6 recalled his child stating to him "Daddy, I thought you were going to die." Victim 6 ended the interview and acknowledged that his children are traumatized.

CONCLUSION

49. Based on all of the foregoing facts, I submit that there is probable cause to believe that defendants ARMSTRONG, ALLEN, KELLY, [REDACTED] [REDACTED] have committed a violation of 18 U.S.C. §§ 241 and 248(a)(2).


Timothy M. Gerber
Special Agent
Homeland Security Investigations

Subscribed and sworn via reliable electronic means (FaceTime and email) pursuant to Fed. R. Crim. P. 41(d)(3) on this date, January 20, 2026.


DOUGLAS L. MICKO
UNITED STATES MAGISTRATE JUDGE