

## UNITED STATES DISTRICT COURT

for the

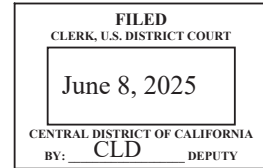
Central District of California

United States of America

v.

DAVID JOSE HUERTA,

Defendant.



Case No. 2:25-MJ-03504-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

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 of June 6, 2025, in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section*  
18 U.S.C. § 372

*Offense Description*  
Conspiracy to Impede an Officer

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/s/

Complainant's signature

Ryan Ribner, HSI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: June 8, 2025 at 11:42 a.m.

City and state: Los Angeles, California

A handwritten signature in cursive script, appearing to read "Jacqueline Chooljian".

Judge's signature

Hon. Jacqueline Chooljian, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Ryan Ribner, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint and arrest warrant against David Jose Huerta ("HUERTA") for a violation of 18 U.S.C. § 372 (Conspiracy to Impede an Officer).

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. 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 of 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.

**II. BACKGROUND OF RYAN RIBNER**

3. I am a Supervisory Special Agent ("SSA") with the Department of Homeland Security ("DHS") United States Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"). I currently supervise the Cyber Financial investigations group at the HSI Los Angeles office. I have been employed with HSI since 2009, and I have also been assigned to HSI Arizona, HSI Attaché Montreal, Canada, and HSI Chicago, Illinois. Prior to my employment with HSI I was

employed for approximately seven years as a full-time Illinois certified police officer for two police departments located in the Chicagoland area. In connection with my official duties I have personally conducted, managed, and participated in investigations which have resulted in the arrest, prosecution, and dismantlement of trans-national and domestic criminal organizations for various offenses to include identity theft, money laundering, human smuggling, narcotics trafficking and various frauds. I hold a certification as an anti-money laundering specialist ("CAMS") from the Association of Anti-Money Laundering Specialists ("ACAMS"), a graduate certificate in Law Enforcement Intelligence Operations from the Michigan State University, a Master of Arts degree from Webster University, and a Bachelor of Arts degree from the University of Michigan.

### **III. STATEMENT OF PROBABLE CAUSE**

4. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

#### **A. HUERTA and Others Arrive at a Location Where Federal Agents Are Executing a Criminal Search Warrant**

5. On June 5, 2025, the Honorable Margo A. Rocconi, United States Magistrate Judge, authorized four search warrants for four business premises suspected of unlawfully employing illegal aliens and falsifying employment records related to the status of its employees, among other federal crimes, in

violation of 8 U.S.C. §§ 1324(a), 1324a, 1326, 18 U.S.C. §§ 1001, 1015(e), 1546, and 42 U.S.C. §§ 408(a)(7)(B).

6. On June 6, 2025, I and other law enforcement officers assisted with the execution of the four federal criminal search warrants, including one for the premises at 2415 East 15th Street in Los Angeles, California. We were dressed in clothing that clearly identified ourselves as a law enforcement.

7. I am aware from my review of various social media posts that word quickly spread about "ICE raids" taking place throughout Los Angeles.

8. I am also aware from speaking with an undercover officer in plain clothes that at some point after the operation began, at approximately 11:10 a.m., a woman arrived outside a vehicular gate separating the premises from the street. This woman started expressing her views against immigration enforcement and began using her phone to film law enforcement officers on the other side of the gate. The undercover officer recalled hearing the woman make reference on her phone to the existence of "DEA" and "FBI," and also heard her describe where various officers were standing. She appeared to be narrating to someone else on the other line, possibly by using a video conferencing feature.

9. According to the undercover officer, approximately 15-30 minutes after the woman completed her call, multiple additional protestors arrived at the site of the search warrant. Based on my review of the video captured by the undercover officer, a person later identified as HUERTA arrived on scene no

later than approximately 11:49 a.m. The protestors, including HUERTA, appeared to be communicating with each other in a concerted effort to disrupt the law enforcement operations.

10. As I approached the vehicular gate from inside the premises, I saw HUERTA, who was wearing a red and white checkered shirt, on the other side of the gate walking back and forth and yelling. The undercover officer also captured videos showing HUERTA apparently typing text into his digital device while present at the protest.

11. HUERTA's registered address with the Department of Motor Vehicles is in Highland Park, California, which is approximately nine miles from the location. His employer has offices in multiple locations, and while I do not yet know exactly where HUERTA works, I do not believe his employer has an office within walking distance of the site of this protest. I therefore believe that HUERTA received communications from others coordinating a protest at this location on his digital device.

**B. HUERTA and Others Block the Path of a Law Enforcement Vehicle as It Was Attempting to Assist with the Execution of a Federal Criminal Search Warrant**

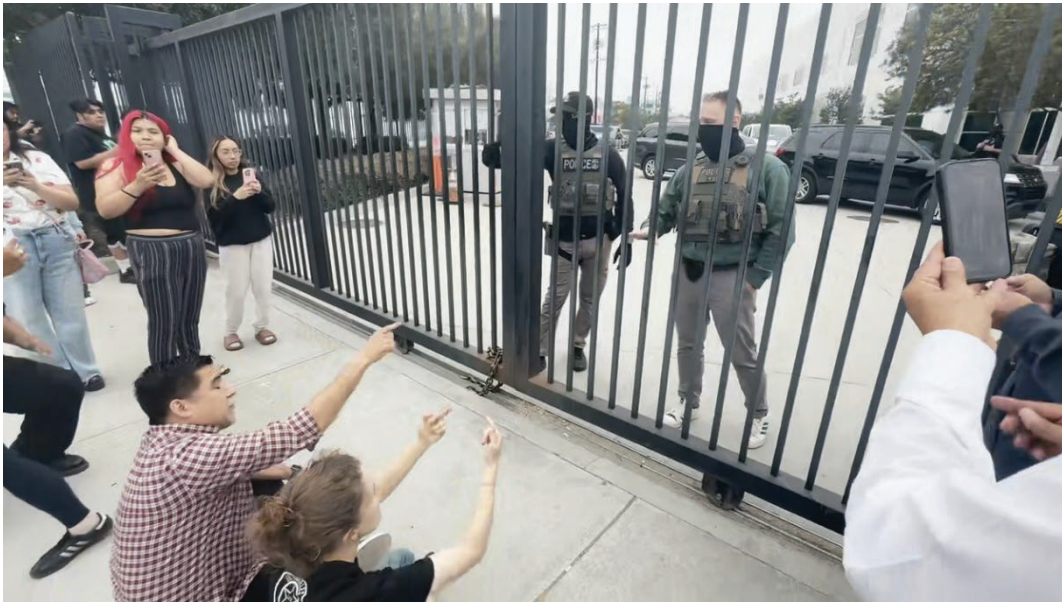
12. As a crowd gathered outside of the vehicular gate, individuals in the crowd began screaming expletives at law enforcement officers through the gate in an attempt to intimidate them. For example, one individual yelled "I want you to kill yourself! Go home and drink a lot of vodka and shoot yourself with your own god damn revolver!"

13. HUERTA was also yelling at me and other officers, at one point screaming "explain to me, you want to go fucking speak with your fucking face" and reaching through the gate to gesture with his arm. HUERTA followed up by taunting us, saying "what are you going to do" several times, with another in the crowd responding "nothing!"



14. Sometime later, HUERTA and another person sat cross-legged in front of the vehicular gate. HUERTA waved at those around him and yelled "everybody sit down, sit down!" According to the undercover officer, who was in the crowd, HUERTA also yelled to the protestors "stop the vehicles" and "it's a public sidewalk, they can't stop us." The undercover officer also heard HUERTA yell "walk in circles and picket," "they are trying

to get vehicles in," and "it's a public sidewalk, what are they going to do!"



15. At some point, someone in the crowd attempted to padlock the gate to prevent law enforcement vehicles from coming in or out.



16. In addition to sitting in front of the gate, HUERTA at various times stood up and paced in front of the gate, effectively preventing law enforcement vehicles from entering or exiting the premises through the gate to execute the search warrant. As far as I was aware, this gate was the only location through which vehicles could enter or exit the premises.

17. I asked HUERTA to move away from the gate because he was impeding law enforcement access into and out of the premises. HUERTA responded "what are you going to do, you can't arrest all of us." This indicated to me that he and the others had planned in advance of arrival to disrupt the operation.

18. I told HUERTA that if he continued to block the gate, he would be arrested. HUERTA replied "I can't hear you through your fucking mask." Others in the crowd repeatedly asked me and other law enforcement officers to take our masks off and attempted to film our faces and badges in an apparent attempt to intimidate us. Based on my training and experience, I know that protestors often do this so that they can publish identifying information about law enforcement officers online.<sup>1</sup> That way, others can harass or threaten the law enforcement officers in the future.

19. Someone else in the crowd began to instruct the crowd to "start a picket line, walk back and forth" in order to prevent vehicles from entering through the gate. Another

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<sup>1</sup> Many in the crowd appeared to be live-streaming their interactions with myself and the other officers.

exhorted the crowd to "just keep making a circle, keep making a circle" in front of the gate.

20. HUERTA also instructed the crowd in Spanish, saying "Debemos de piquitar. Hacer un circulo. Seguir caminando, seguir caminando. Tenemos derechos. Sigue caminado, caminando, caminando. Hacer un circulo, acer un circulo companero. Caminar, piquitiar." According to a Border Patrol Agent who speaks Spanish, this roughly translates to: "We must form a group. Make a circle. Keep walking, keep walking. We have rights. Keep walking, walking, walking. Make a circle, make a circle comrade. Walking, in a group."

21. HUERTA and the crowd remained in front of the gate for some time. At one point HUERTA reached through the gate and made an offensive gesture to law enforcement officers.



22. HUERTA and another man also repeatedly banged on the gate in another attempt to intimidate us.



23. As the crowd continued to grow, a white law enforcement van that was audibly using its sirens, which were flashing blue and red, attempted to enter the premises through the gate. As officers issued instructions to clear the way, HUERTA refused to move away from the path of the vehicle and instead stood in front of the vehicle with his hands on his hips.



24. A law enforcement officer approached HUERTA. Because HUERTA was being uncooperative, the officer put his hands on HUERTA in an attempt to move him out of the path of the vehicle. I saw HUERTA push back, and in response, the officer pushed HUERTA to the ground. The officer and I then handcuffed HUERTA and arrested him.

25. Other protestors continued to block the van and had to be physically removed from the van's path. The van was eventually able to enter the premises through the gate.



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**IV. CONCLUSION**

26. For all of the reasons described above, there is probable cause to believe that David Jose Huerta has committed a violation of 18 U.S.C. § 372 (Conspiracy to Impede an Officer).

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 8th day of  
June, 2025 at 11:42 a.m.

  
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HONORABLE JACQUELINE CHOOLJIAN  
UNITED STATES MAGISTRATE JUDGE