

UNITED STATES DISTRICT COURT

for the

Northern District of Alabama

United States of America
v.

Cesar ACOSTA

)
)
) Case No.
)
)
)
)
)
)

26-49

Defendant(s)

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 February 16, 2026 in the county of Blount in the
Northern District of Alabama, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 111	Assaulting, Resisitng, or Impeding certain Officers or Employees

This criminal complaint is based on these facts:

See Attached Affidavit from HSI ICE Deporation Officer William P. Stone which is attached hereto and fully incorporated herein.

Continued on the attached sheet.

Complainant's signature

ICE Deportation Officer William P. Stone

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/16/2026



Judge's signature

City and state: Birmingham, Alabama

Hon. John H. England, III, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, William P Stone, being duly first sworn, depose and say:

1. I am a Deportation Officer with United States Immigration and Customs Enforcement (“ICE”) within the United States Department of Homeland Security (“DHS”). I have served as a Deportation Officer with ICE since July 4, 2021. Before that time, I was employed as a United States Border Patrol Agent (USBP) with U. S. Customs and Border Protection (CBP), Department of Homeland Security, for twelve years. As part of my duties as a Deportation Officer, I am charged with conducting investigations related to violations of the Immigration and Nationality Act, specifically foreign-born nationals that have been deported from the United States and subsequently re-entered the United States illegally. I am currently assigned to the ICE Enforcement and Removal Operations – Gadsden, Alabama, sub office in the New Orleans, Louisiana, area of responsibility, and part of my duties include investigating violations of Title 8 of the United States Code (“U.S.C.”), including illegal reentry and related offenses.

2. This affidavit is made in support of a criminal complaint against Cesar ACOSTA and Jimmy GOMEZ and sets forth the probable cause that Cesar ACOSTA and Jimmy GOMEZ, are native and citizen of United States, and did actively oppose, impede, intimidate, or interfered with a federal officer

engaged in the performance of their duties did impede while conducting and arrest in violation of Title 18, United States Code, Section 111.

3. This affidavit is based upon my personal knowledge, experience, and investigation, as well as information relayed to me by other federal and state law enforcement officers in the course of their official duties. Because this affidavit is submitted for the limited purpose of supporting a criminal complaint and arrest warrant, I have not included all the information known by me or other investigators. I have set forth only those facts I believe are essential to establish the necessary foundation for the complaint and warrant.

4. On or about February 16, 2026, Cesar ACOSTA and Jimmy Gomez were arrested by the Immigration and Customs Enforcement (ICE) near Walnut Grove, AL within the Northern District of Alabama.

5. Your affiant and Supervisor Detention and Deportation Officer Jared Holland were working in the Snead, Alabama area during the afternoon of February 16, 2026. Your affiant and SDDO Holland were attempting to make an administrative arrest on an illegal immigrant (hereinafter referred to as “the Target”)¹, who was identified by ICE. The Target, a construction worker / roofer was seen on top of the City of Snead Townhall building, which is

¹ The name and the identity of the Target is known to ICE and your affiant. However, for the purposes of this affidavit, the Target’s name is being withheld to protect his identity and to not impede future ICE operations.

currently being re-roofed. Attempts were made by local police officers, as well as ICE Officers to talk the Target into climbing down off the roof, but the Target refused. ICE officers made the decision not to attempt an arrest for officers' safety and for the safety of the Target. Your affiant and ICE officers then left the area.

6. Approximately two hours later, your affiant and ICE SDDO Holland returned to the downtown Snead area. Your affiant and SDDO Holland saw two vehicles parked near the townhall building, the Target's white van and a white GMC Sierra pickup truck. Another white van then arrived to the area. The Target eventually came down off the roof and got into the white van that had recently arrived.

7. The two white vans and GMC pickup truck all left the area together. SDDO Holland got behind the white van that contained the Target. After about ten miles, SDDO Holland activated the blue-lights on his vehicle to attempt a traffic stop. During the ten-mile drive, the white GMC pickup swerved numerous times, driving erratically, attempting to impede your affiant as your affiant kept up with the vehicle pursuit.

8. All three vehicles came to a stop after SDDO Holland activated his blue lights, near Holly Street and US Highway 278 in the Town of Walnut Grove, Alabama. The Target, as well as ACOSTA and Gomez then fled on foot,

running together towards a wooded area. Your affiant and SDDO Holland pursued on foot.

9. ACOSTA and Gomez actively opposed, impeded, intimidated, or interfered with SDDO Holland and your affiant, federal officers engaged in the performance of their duties while conducting a traffic stop on the Target. While the foot pursuit was on going, ACOSTA made contact with SDDO Holland, in a basketball style “pick” move to slow the officer’s pursuit of the target subject, causing SDDO Holland to trip and fall to the ground.

10. Your affiant then stopped pursuing the Target to assist SDDO Holland, and to make an arrest of ACOSTA and Gomez for interfering with SDDO Holland and your affiant. Your affiant and SDDO Holland were performing our official duties, *i.e.*, making a lawful arrest of an illegal immigrant, on February 16, 2026. Due to the actions of ACOSTA and Gomez, your affiant and SDDO Holland were obstructed and impeded in the course of our official duties. As a result, the Target successfully evaded arrest and was not taken into custody.

11. Based on the above facts, your affiant believes that there is probable cause to establish that Cesar ACOSTA has violated 18 U.S.C. § 111.

William P. Stone
U.S. Department of Homeland Security

Sworn to telephonically and subscribed electronically this the 16th day of February, 2026.



The Honorable John H. England, III
United States Magistrate Judge
Northern District of Alabama