

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

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 numerous 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. 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 a commissioned officer in the United States Army from 2014 to 2024 where I served as a Logistics Officer and Special Forces Officer.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Maxwell Louis COLLYARD for assault of a federal officer 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. On December 15, 2025, a team of federal law enforcement officers lead by a senior detention and deportation officer of Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) (hereinafter "Victim Officer") effected an arrest at approximately 1:00 p.m. on a target vehicle near Pilsbury Avenue and West 29th Street in Minneapolis, Minnesota. The federal officers were wearing marked vests identifying them as law enforcement officers.

5. While confirming the identity of the target and passenger of the target vehicle, an unidentified woman spray painted one of the ERO police vehicles with "ICE" while its police lights were flashing. Officers pursued the unidentified woman and attempted to arrest and handcuff her. The unidentified woman refused to comply and resisted arrest. Throughout this encounter, approximately 60 to 70 people amassed around the officers who were attempting to arrest the unidentified woman. Members of the mob threw ice, snow, rocks, and water bottles at the officers.

6. COLLYARD was one of the mob of people who approached the arrest. COLLYARD, as well as others, were threatening officers, yelling among other things "We'll kill you." The Victim Officer directed COLLYARD to back up. COLLYARD instead assumed an aggressive posture, clenched his fists, and continued to threaten officers.

7. Based on COLLYARD's threats and aggressive posture, the Victim Officer sprayed COLLYARD with oleoresin capsicum spray, commonly referred to as OC spray. COLLYARD continued to advance toward the Victim Officer and ignore the officer's commands to back up.

8. The Victim Officer turned to assist another officer with arresting the unidentified woman. As he did so, COLLYARD and other people in the mob tackled the Victim Officer to the ground. The Victim Officer was able to get free of COLLYARD and other people in the mob and resumed giving them verbal commands to stay back.

9. In the chaos, the unidentified woman was able to run away from the scene.

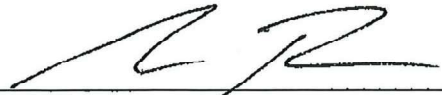
10. When the Victim Officer and his team were departing the intersection, the Victim Officer noticed a blue pickup truck behind him, driven by COLLYARD. The Victim Officer recognized COLLYARD by the jacket he was wearing. The Victim Officer also saw that COLLYARD still had OC spray residue on his face. Officers arrested COLLYARD.

11. I (along with other agents) reviewed publicly posted videos of the incident. I identified COLLYARD grabbing the unidentified woman's leg and pulling her away from officers as the officers were attempting to move the woman away from the mob. The Victim Officer can be seen spraying COLLYARD while COLLYARD approached the unidentified woman. In another video, COLLYARD is seen and heard yelling at Officers when another protestor was being arrested. COLLYARD then moves to a Minneapolis police officer along with other people in the mob. Approximately two minutes later in the video, the Victim Officer can be seen driving away with the identifiable blue pickup truck following behind.

CONCLUSION

12. Based on the information set forth above, there is probable cause to believe that the Defendant, Maxwell Louis COLLYARD, violated Title 18, United States Code, Section 111, and that the act involved contact with the victim and the intent to commit another felony.

Further your Affiant sayeth not.



Michael T. Raiff
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
December 16, 2025



DAVID T. SCHULTZ
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA