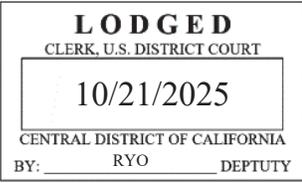


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

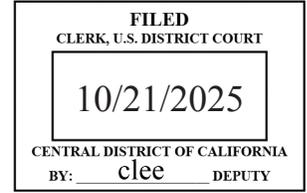
Original Duplicate Original



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

CARLITOS RICARDO PARIAS,

Defendant.

Case No. 2:25-mj-06539-DUTY

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, Norman Early, 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 October 21, 2025, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 111

Offense Description

Assault on a Federal Officer

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

/s/

Complainant's signature

Norman Early, 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: October 21, 2025

Judge's signature

City and state: Los Angeles, California

Hon. Steve Kim, U.S. Magistrate Judge

Printed name and title



AFFIDAVIT

I, Norman Early, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the United States Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI") in Los Angeles, California, and I have been so employed since November 2023. I am currently assigned to the HSI Integrated Operations Group Task Force ("Task Force"). As part of this Task Force, I investigate various immigration crimes with DHS agents and analysts, including HSI and ICE. As a result of my collaboration with these DHS employees on this Task Force, I am familiar with DHS databases that are used to identify individuals who are subject to prosecution for immigration crimes. I previously served as a Deportation Officer with ICE, Enforcement and Removal Operations ("ERO") in Los Angeles, California from September 2020 until November 2023.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, Carlitos Ricardo Parias ("PARIAS") for a violation of 18 U.S.C. § 111, Assault on a Federal Officer.

3. 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 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 in part only and all dates and times are on or about those indicated.

III. STATEMENT OF PROBABLE CAUSE

4. Based on my discussions with witnesses, conversations with other law enforcement agents, review of video footage and my own involvement in the investigation, I am aware of the following:

5. On October 21, 2025, federal law enforcement agents from HSI, ERO, and the United States Marshals Service ("USMS") set up surveillance in the neighborhood around the home located on the 400 block of 20th Street in Los Angeles (the "20th Street Residence"), within the Central District of California. The agents set up surveillance near the 20th Street Residence because PARIAS was the subject of an administrative arrest warrant issued in conjunction with a federal immigration proceeding, and the agents believed PARIAS could be found at that location. Previously, federal agents had tried to arrest PARIAS on the same immigration warrant but he avoided capture.

6. At approximately 8:45 a.m. on October 21, 2025, one of the federal agents conducting surveillance on the 20th Street Residence saw PARIAS exit the home, enter a grey Toyota Camry (the "Camry"), and drive away from the home eastbound on 20th Street. As PARIAS drove the Camry eastbound, an ERO agent

driving a Dodge Durango (the "Durango") westbound on 20th Street positioned the Durango in front of the Camry to prevent PARIAS from driving further east.

7. As the Durango approached the Camry, however, it appeared that PARIAS recognized that the Durango was a law enforcement vehicle because the Camry began quickly reversing away from the Durango (the Durango had its emergency lights activated, indicating that it was a law enforcement vehicle). But as the Camry reversed, two other law enforcement vehicles approached the Camry and prevented its further travel. First, a Ford Escape (the "Escape") operated by an HSI agent approached from the east and parked on the north side of the Camry. Almost simultaneously, a Dodge Ram (the "Ram") operated by a Deputy from USMS approached from the east and parked behind the Camry. As such, the Durango, Escape, and Ram boxed in the Camry (cars parked in the street flanked the south side of the Camry) and left PARIAS with no reasonable means of escape.

8. Once the Camry was boxed in, agents from ERO, HSI, and USMS approached the Camry and began giving PARIAS verbal commands to exit the car and submit to arrest. Instead of heading those commands, PARIAS drove the Camry both forward and back, with the Camry making contact with both the Durango and the Ram. Given PARIAS's continued refusal to comply with agents' orders, one of the federal agents on scene attempted to break the driver's side window of the Camry. PARIAS still refused to submit to arrest, and proceeded to drive the Camry more aggressively, forwards toward the Durango. PARIAS's

aggressive driving escalated to the point that large plumes of smoke formed around the Camry, apparently caused by the spinning of the car's tires:



9. As PARIAS accelerated the Camry toward the Durango, federal agents were positioned on either side of the car, including on the south side of the Camry near where other cars were parked on 20th Street. According to those agents, not only was the Camry accelerating aggressively forward, but the rear of the car began to fishtail, which caused the agents to fear that PARIAS may lose control of the Camry and hit them.

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10. In addition, PARIAS's aggressive acceleration of the Camry caused debris (likely rubber being shed from the tires themselves) to fly into the air, which struck some of the agents:



11. All of these factors, in conjunction with the large amount of smoke produced by the spinning of the Camry's tires, caused the agents on scene to fear that PARIAS would successfully dislodge the Camry from between the Durango and Ram and injure them.

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IV. CONCLUSION

12. For all the reasons described above, there is probable cause to believe that PARIAS violated 18 U.S.C. §§ 111 (Assault on a Federal Officer).

/s/

Norman Early, Special Agent
HSI

Subscribed and sworn to me on this
21st day of October 2025.



HONORABLE STEVE KIM
UNITED STATES MAGISTRATE JUDGE