

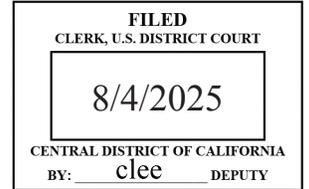
AO 91 (Rev. 11/11) Criminal Complaint



UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America)
v.)
ASHLEIGH BROWN and)
JONATHON REDONDO-ROSALES,)
)
)
)
)
)
)

Case No. 2:25-mj-04835-DUTY

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 August 2, 2025 in the county of Los Angeles in the Central District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 111(a)(1)	Assault on a Federal Officer

This criminal complaint is based on these facts:

See Affidavit

Continued on the attached sheet.

/s/
Complainant's signature

Thomas J. Smith, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: August 4, 2025

City and state: Los Angeles, CA

Judge's signature

Hon. Steve Kim
Printed name and title



AFFIDAVIT

I, THOMAS J. SMITH, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the Department of Homeland Security, Federal Protective Service ("FPS"). I have been an FPS Special Agent for the past seven years and am currently assigned as a Criminal Investigator for FPS in the Los Angeles Field Office. Prior to becoming a Special Agent, I was assigned as a Uniformed Inspector for the FPS for four years. As a Uniformed Inspector, I performed security duties for federal facilities in Washington, D.C., and Albuquerque, New Mexico. In 2008, I received over 440 hours of training in investigations at the Federal Law Enforcement Training Center in Glynco, Georgia. I have also received over 168 hours of Threat Assessment and Management and Physical Security Training. As a federal law enforcement officer, I have investigated over 100 cases involving criminal threats.

II. PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, ASHLEIGH BROWN ("BROWN") and JONATHON REDONDO-ROSALES ("REDONDO-ROSALES") for violations of 18 U.S.C. § 111(a)(1) (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 arrest warrants 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.

III. STATEMENT OF PROBABLE CAUSE

4. Based on my review of video footage captured by surveillance cameras posted near the entrance to the Roybal Federal Building located on the 500 block of North Alameda Street in Los Angeles (the "Alameda Street Entrance"), video footage publicly available on TikTok and apparently captured by civilian bystanders positioned outside the Alameda Street Entrance at the time of the below-described events, and my conversations with other federal officers and agents, I know the following:

a. On August 2, 2025, a small group of protesters gathered near the Alameda Street Entrance. It appears that the group of bystanders congregated near the Alameda Street Entrance to protest recent federal immigration enforcement actions in the Los Angeles area.

b. At approximately 6:13 p.m., FPS officers witnessed a protestor who was later identified as REDONDO-ROSALES, jump on the hood of a stopped government car departing the Alameda Street Entrance.

c. Approximately three FPS Officers, including FPS Officer Z.C., walked out to remove REDONDO-ROSALES from the path of the government car. As the group of FPS officers approached REDONDO-ROSALES, he moved backwards away from the FPS officers in an apparent attempt to avoid being apprehended. Then, FPS Officer Z.C. approached REDONDO-ROSALES in an effort to detain him, and REDONDO-ROSALES intentionally struck Officer Z.C. in the face with his left hand (at the time, REDONDO-ROSALES had a tan, wide-brimmed hat in his left hand).

d. After FPS officers were able to detain REDONDO-ROSALES, Officer Z.C. and approximately four other FPS officers began to escort REDONDO-ROSALES towards the Alameda Street Entrance.

e. As Officer Z.C. walked a few feet in front of the two FPS officers who were escorting REDONDO-ROSALES toward the Alameda Street Entrance, BROWN approached Officer Z.C. and stepped into Officer Z.C.'s path. Officer Z.C. continued past BROWN toward the Alameda Street Entrance, but as he did so, BROWN intentionally hit Officer Z.C. in his left side with her right arm.

IV. CONCLUSION

5. For all the reasons described above, there is probable cause to believe that REDONDO-ROSALES and BROWN have committed violations of 18 U.S.C. § 111(a)(1) (Assault of a Federal Officer).

