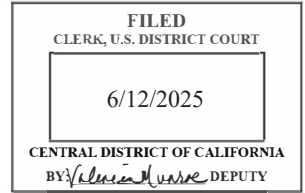


AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original**UNITED STATES DISTRICT COURT**

for the

Central District of California



United States of America,

Plaintiff,

v.

ALEJANDRO THEODORO ORELLANA,

Defendant.

Case No. 2:25-MJ-03615-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 9, 2025 in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 371

18 U.S.C. §§ 231(a)(3), 2

Offense Description

Conspiracy to Commit Civil Disorders

Aiding and Abetting Civil Disorders

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet./s/ Rene Persaud

Complainant's signature

RENE PERSAUD, 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: 6/12/25

Judge's signature

City and state: Los Angeles, CaliforniaHon. Charles F. Eick, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Rene Persaud, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), and have been so employed since September 2018. Prior to becoming a SA, I worked for the FBI's Special Surveillance Group for approximately four years. Prior to joining the FBI, I was a Deputy Sheriff for the Hillsborough County (Florida) Sheriff's Office for approximately three years.

2. I have participated in various aspects of criminal enterprise investigations, including but not limited to, conducting surveillance and arrests, issuing subpoenas, seizing and impounding drug evidence, social media analysis, and the analysis of telephone tolls and other data. Additionally, I have interviewed and/or debriefed confidential informants and other witnesses who have had knowledge regarding the investigations in which I have been involved. I have also authored, sworn out, and executed multiple search warrants for various entities, including but not limited to, Internet service providers, social media companies, GPS tracking units, and physical residences/businesses.

II. PURPOSE OF AFFIDAVIT

a. This affidavit is in support of a criminal complaint against ALEJANDRO THEODORO ORELLANA ("ORELLANA") for violations of 18 U.S.C. § 371 (Conspiracy to Commit Civil Disorders) and 18 U.S.C. §§ 238(a)(3), 2 (Aiding and Abetting Civil Disorders) (the "Subject Offenses").

3. The facts set forth in this affidavit are based upon my participation in this investigation, my personal observations, my training and experience, my review of evidence, including investigative reports, 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 criminal complaint 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, all amounts or sums are approximate, and all dates and times are on or about those indicated.

III. SUMMARY OF PROBABLE CAUSE

4. On June 6, 2025, federal law enforcement officials conducted immigration enforcement operations throughout the Los Angeles area. Following those operations, protests occurred in and around downtown Los Angeles, California. While many of the protestors peacefully exercised their First Amendment rights to protest, individuals within the crowd directly engaged in violent actions to obstruct, impede, or interfere with law enforcement officers lawful performance of their official duties incident to and during the commission of a civil disorder, which obstructed, delayed, and adversely obstructed commerce, the movement of articles and commodities in commerce, and conduct and performance of federally protected functions. In addition to those directly engaged in violence, other individuals

directly aided and abetted their actions to engage in civil disorders.

5. On June 9, 2025, ORELLANA drove his truck to downtown Los Angeles with an unidentified woman ("UW") to disseminate face shields to individuals dressed similarly to those engaged in violence and/or vandalism that were later encountered by local law enforcement. ORELLANA's actions were captured on video posted to social media and observed by Los Angeles County Sheriff's Deputies. According to various websites that market the shields, the face shields possessed by ORELLANA are specifically designed to protect from "chemical splashes and flying debris," which would help protect violent agitators from less-than lethal weapons deployed by local police departments in an effort to quell violence during the civil disorder.

6. On June 12, 2025, federal law enforcement agents executed a federal warrant at ORELLANA's residence, where they found evidence consistent with his participation in the Subject Offenses. ORELLANA was arrested and is currently in federal custody.

IV. STATEMENT OF PROBABLE CAUSE

A. Protests Took Place in Downtown Los Angeles and an Unlawful Assembly was Declared by the Los Angeles Police Department

7. On June 6, 2025, federal law enforcement officials from Immigrations and Customs Enforcement ("ICE") and Homeland Security Investigations ("HSI") conducted immigration enforcement actions supported by the Drug Enforcement Administration ("DEA"), the United States Marshals Service

("USMS"), the Federal Bureau of Investigation ("FBI") and other federal law enforcement agencies in and around Los Angeles, California. Following this enforcement activity, protests sprung up in various locations in and around the city of Los Angeles. Many of these protests were in the vicinity of federal government facilities in downtown Los Angeles, including the Federal Building located at 300 North Los Angeles Street, Los Angeles, California ("Federal Building"), near the intersection of North Los Angeles Street and East Temple Street. This location is within the Central District of California.

8. While many of the protests were peaceful, agitators within the crowd continuously engaged in violent activity -- constituting a civil disorder -- directed at private property, government buildings, and both federal and local law enforcement officers. Multiple officers and agents from the Los Angeles Police Department ("LAPD"), Los Angeles Sheriff's Department ("LASD"), USMS, and the FBI were assaulted, at times requiring medical attention. Multiple federal buildings were also vandalized with graffiti and law enforcement vehicles were damaged by blunt objects swung by violent protestors.

9. On June 9, 2025, protests continued to devolve from peaceful during the day to progressively more violent in the afternoon into the evening. At approximately 2:10 p.m. that day, the LAPD declared an unlawful assembly and all protestors were asked to vacate the area. Based on my conversations with other law enforcement officers, when an unlawful assembly is declared, it is common for non-violent and peaceful protestors

to adhere to lawful orders, not only to avoid arrest but to avoid being caught between violent agitators and law enforcement's response to their actions. Thus, in the hours after 2:10 p.m. on June 9, 2025, it became less and less likely for non-violent, peaceful protestors to be in or around the area of downtown Los Angeles.

10. According to my conversations with LAPD officers, at approximately 4:48 p.m., the unlawful assembly order was also specifically transmitted via loudspeaker in English and Spanish to protestors at the intersection of North Los Angeles Street and East Temple Street, near the Federal Building.

11. In addition to operations of the United States government whose critical functions were impacted by the protests, there are multiple businesses located in this area. Following the declaration of the unlawful assembly order, the continuous presence of protestors, particularly violent protestors, affected commerce or the movement of any article or commodity in commerce from these businesses.

B. ORELLANA Arrived and Disseminated Face Shields

12. According to my conversations with officers from the California Highway Patrol ("CHP") and reports I reviewed, on June 9, 2025 at approximately 4:20 p.m., a Black Ford F-150 Pickup ("the F-150 Pickup") arrived at a location just outside downtown Los Angeles and met with multiple subjects on 1st Street near the intersection with Boyle Avenue. I reviewed surveillance photographs of the F-150 Pickup from this incident and was able to identify ORELLANA as the driver. Multiple

unknown men and women then loaded white boxes into the bed of the F-150 Pickup. Some of these boxes were discarded in the street, and CHP Officers walked by to get a closer look and took photographs of the boxes. Based on their photographs, which I reviewed, the boxes were clearly marked as "The Uvex Bionic Shield" brand face shields.

13. According to my conversations with LASD deputies and a report I reviewed, on or about June 9, 2025, at approximately 4:53 p.m., ORELLANA drove a Black Ford F-150 Pickup ("the F-150 Pickup") into downtown Los Angeles near the intersection of North Los Angeles Street and East Temple Street, near the Federal Building. While ORELLANA remained in the driver's seat, the UW exited the truck to help distribute white boxes containing "The Uvex Bionic Shield" brand face shields to individuals around the F-150 Pickup.



14. I reviewed videos and photographs posted on the social media site X (formerly known as Twitter) as well as videos posted on YouTube. In those videos, I was able to corroborate LASD's observations. I could clearly see a man and a woman arrive in the F-150 Pickup, the woman exited the vehicle, moved to the bed of the truck, and assisted individuals with disseminating the white boxes clearly marked as "The Uvex Bionic Shield" brand face shields that were stored in the bed of the F-150 Pickup.

15. The individuals receiving and/or disseminating the face shields were dressed in a variety of clothing to include, but not limited to, black colored clothes, face masks, hooded sweatshirts covering faces, and various other clothing that made it difficult to identify them. I did not see any of these individuals carrying signs typically associated with peaceful protestors, such as signs containing anti-ICE or pro-immigrant messages. Additionally, I did not see any signs showing support for individuals who were arrested or detained, such as those seen carried by legitimate peaceful demonstrators throughout the weekend.

16. I conducted research to determine how the "The Uvex Bionic Shield" brand face shields were marketed. On various websites, these face shields were marketed to protect "head and neck from chemical splashes and flying debris" as well as provide "anti-fog" and "excellent visibility." Based on this description, these face shields provide the necessary protection to weaken the effects of less-than-lethal law enforcement

devices commonly deployed during unlawful violent assemblies, such as pepper spray and other aerosolized gases. In other words, these face shields would be effective in aiding the obstruction, impediment, and interference with law enforcement officers' execution of their lawful duties.

17. Based on my training and experience and discussion with other law enforcement officers, wearing a face shield of this type is not common amongst non-violent, peaceful protestors. Rather, this is the kind of item used by violent agitators to enable them to resist law enforcement and to engage in violence and/or vandalism during a civil disorder.

18. I was able to positively identify ORELLANA as the driver of the F-150 Pickup based on my review of social media photos of ORELLANA driving the F-150 Pickup where his face was clearly visible and comparing them to his California Driver's License photo. The photos were a clear match, and I was able to confirm ORELLANA as the driver and registered owner of the F-150 Pickup.

C. Identification of ORELLANA's Residence and Execution of Search Warrants

19. On June 10, 2025, I reviewed California Department of Motor Vehicles and other database records that identified an address in Los Angeles as ORELLANA's residence since at least 2023. On June 10 and 11, 2025, FBI and IRS Special Agents conducted surveillance at the residence and observed the F-150 Pickup parked inside an enclosed and gated parking lot at the residence. Agents were able to clearly view the F-150 Pickup

from the publicly accessible street. At approximately 5:10 p.m. on June 11, 2025, HSI agents observed ORELLANA departing the location in a different vehicle. He was observed traveling to the location of a protest.

20. On June 11, 2025, United States Magistrate Charles F. Eick authorized search warrants for ORELLANA, the F-150 Pickup, and the residence. On the morning of June 12, 2025, agents executed the search warrants at the residence, where ORELLANA was located at the time. Among the items found and seized during the execution of the search were:

a. A notebook containing various notes, including violent language towards law enforcement such as "1312 blue lives murder 187."

i. I know from my training and experience that 1312 is a common code for the phrase "all cops are bastards," a common anti-police political slogan. 187 is a common slang term for murder, based on California Penal Code 187.

b. A powerful wrist-rocket style slingshot and ammunition for the slingshot, including a small bag of rocks and Slingshot with a small bag of rocks and containers of metal bee bees.

i. I know from discussions with other law enforcement officers that historically during other periods of civil unrest in the city of Los Angeles that high powered slingshots like this have been used to assault law enforcement officers. During the recent violence during protests in June

2025, there has been one reported incident of a slingshot being used to attack law enforcement officers.

- c. A can of spray paint.
- d. Plastic goggles.
- e. Multiple fabric and N95 face masks.

Those items are pictured below:



21. Based on the results of the search and the probable cause discussed above, ORELLANA was arrested.

V. CONCLUSION

22. For the reasons described above, there is probable cause to believe that ORELLANA committed criminal violations of 18 U.S.C. § 371 (Conspiracy to Commit Civil Disorders) and 18 U.S.C. §§ 231(a)(3), 2 (Aiding and Abetting Civil Disorders) (the Subject Offenses).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 12th day of June, 2025.

A handwritten signature in black ink, appearing to read 'C. F. Eick', is written above a horizontal line.

THE HONORABLE CHARLES F. EICK
UNITED STATES MAGISTRATE JUDGE