

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOEL GONZALEZ

CASE NUMBER:

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 October 2, 2025, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section
111(a)(1)

Offense Description

forcibly impeding and interfering with a federal officer

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

ANDREW B. RYAN

Special Agent, Homeland Security Investigations
(HSI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: October 3, 2025

Judge's signature

City and state: Chicago, Illinois

HEATHER K. MCSHAIN, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, ANDREW B. RYAN, being duly sworn, state as follows:

1. I am a Special Agent with the Homeland Security Investigations (HSI) and have been so employed for two-and-a-half years. I was previously an Agent with Border Patrol from 2019 to 2023. My current responsibilities include the investigation of child pornography violations, fraud, and immigration-related violations.

2. This affidavit is submitted in support of a criminal complaint alleging that Joel Gonzalez has violated Title 18, United States Code, Section 111(a)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging GONZALEZ with forcibly impeding and interfering with a federal officer, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and my review of video evidence.

I. Facts Supporting Probable Cause

4. On October 2, 2025, at approximately 2:00 p.m., Border Patrol Agents were traveling in a convoy of vehicles northbound on or about the 5700 block of South Kedzie Avenue, a single-track road with spaces off lane for parking in certain areas.

Based on review of cellphone video taken by a Border Patrol Agent in a Toyota RAV4 in the convoy, Joel GONZALEZ (identified later, as described below), driving a red Chevrolet Tahoe bearing Illinois license plate "ER5****", accelerated aggressively, and passed the Toyota RAV4 on the right-hand side at a time when both cars were driving through an intersection.

5. As further depicted in the cellphone video, once GONZALEZ passed the Toyota RAV4, he then began to follow Border Patrol Agents driving an unmarked white Ford F150. The white Ford F150 came to a complete stop at the red light on Kedzie Avenue at 57th Street. When the traffic light turned green, the white Ford F150 began to move forward, followed by GONZALEZ, and then stopped suddenly. As depicted in the cellphone video, around the time the Ford F150 began to move forward, GONZALEZ moved his Chevrolet Tahoe to the left and to the right behind the Ford F150. After the Ford F150 passed through the intersection, GONZALEZ followed it at about a car-length distance or less. The Ford F150 stopped suddenly again, and GONZALEZ swerved left and right while stopping behind the Ford F150. The Ford F150 stayed stationary for a few seconds, and GONZALEZ, put the car in reverse briefly, then forward as the Ford F150 began to drive forward. GONZALEZ moved to the left into the oncoming traffic lane, and the Ford F150 moved to the left into the oncoming traffic as well ahead of GONZALEZ, and then GONZALEZ and the Ford F150 moved back to the right lane.

6. As seen in the video, the white Ford F150 then braked and GONZALEZ's vehicle struck the Ford F150 from behind. Images of the damage to the respective vehicles are below.



GONZALEZ then put his vehicle into reverse, drove around the Ford F150 on the right side, onto the sidewalk, and fled west onto 56th Street.

7. Law enforcement identified an address on 61st Street in Chicago as associated with the red Chevrolet Tahoe bearing Illinois license plate “ER5****” and as GONZALEZ's residence. Border Patrol Agents responded to the residence and located GONZALEZ's vehicle parked on the street. GONZALEZ exited the residence and was taken into custody by Border Patrol Agents.

8. GONZALEZ was Mirandized and acknowledged his rights and waived his rights. GONZALEZ stated that he was taking grocery bags out of his vehicle at

his residence when he noticed three vehicles that he thought were ICE vehicles, gray Toyota 4Runner,¹ white Ford F-150 and a black Ford Explorer. GONZALEZ stated that he noticed the body armor and decided to follow the vehicles to get pictures of the license plates and of the vehicles and was trying to be a good Samaritan.

9. GONZALEZ stated that he was behind the 4Runner and saw lasers and lights being pointed at him. He passed the 4Runner and got behind the Ford F150. GONZALEZ said the vehicles were driving aggressively and something to the effect of he “matched their aggression”. GONZALEZ said the Ford F150 accelerated quickly and then braked quickly. GONZALEZ also accelerated quickly and crashed into the rear of the Ford F150 when he was unable to brake in time. GONZALEZ then said he reversed his vehicle and fled the scene down an alleyway and returned home.

10. The events occurred while the Border Patrol Agent driving the white Ford F150 were engaged in the performance of his official duties. At the time of the events, the Border Patrol Agents in the RAV4 and the Ford F150 were employed as Federal Agents for United States Border Patrol, officers of the United States, and were working in an official capacity as designated in Title 18, United States Code, Section 1114.

II. Conclusion

11. For the forgoing reasons, I respectfully submit there exists probable cause that JOEL GONZALEZ forcibly impeded and interfered with an officer of the

¹ I believe that Gonzalez was referring to the Toyota RAV4 that the Border Patrol Agents were driving as part of the caravan.

United States, as designated in Title 18, United States Code, Section 1114, namely, a Federal Agent of the United States Border Patrol while that Federal Agent was engaged in the performance of official duties, all in violation of Title 18, United States Code, Section 111(a)(1).

FURTHER AFFIANT SAYETH NOT.

ANDREW B. RYAN
Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone October 3, 2025.

Honorable HEATHER K. MCSHAIN
United States Magistrate Judge