

FILED**10/2/2025**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MIGUEL ESCARENO DE LOERA

CASE NUMBER: 1:25-cr-00629

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) & (b)*Offense Description*

forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in Title 18, United States Code, Section 1114, namely an officer and employee of the United States, while he was engaged in the performance of his official duties, and in the commission of such acts used a deadly and dangerous weapon

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

**MATTHEW E
DAOUD**Digitally signed by MATTHEW
E DAOUD
Date: 2025.10.02 16:07:52
-05'00'**MATTHEW E. DAOUD**
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 2, 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, MATTHEW DAOUD, being duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (HSI) and have been so employed since January of 2007. My current responsibilities include the investigation of federal criminal violations, including those relating to immigration and assault and the use of technology to support these investigations.

2. This affidavit is submitted in support of a criminal complaint alleging that MIGUEL ESCARENO DE LOERA (ESCARENO) has violated Title 18, United States Code, Section 111(a) & (b). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ESCARENO with assault on a federal officer using a deadly or dangerous weapon, 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 training and experience.

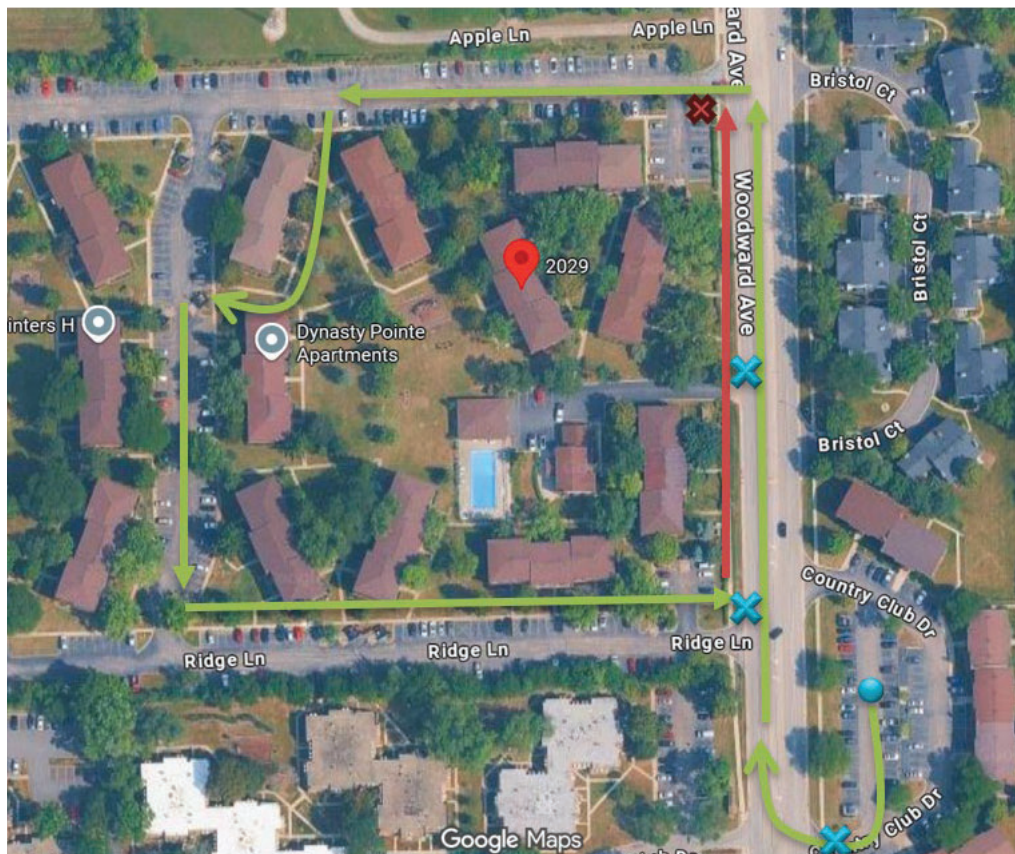
4. On October 1, 2025, Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) Deportation Officers (DO) assembled in the area of the 2000 block of Apple Lane and the 7700 block of Woodward Avenue in

Woodridge, Illinois, to locate and arrest ESCARENO pursuant to an administrative immigration warrant.

5. At approximately 10:45 a.m., ICE ERO DOs observed an individual matching ESCARENO's description approaching a Ford F-250 pickup truck ("pickup truck") in the vicinity of the 7700 block of Woodward Avenue. Two DOs, wearing body armor displaying full police markings, approached the pickup truck on foot near the driver's side and passenger's side.

6. Upon their approach, ESCARENO fled in the pickup truck, driving between the DOs' vehicles, which had been parked in front and to the side of the pickup truck. A third ICE ERO DO (Victim 1) attempted to use his government vehicle to block the pickup truck from leaving the apartment complex in the area; however, ESCARENO struck Victim 1's vehicle's passenger side bumper with his pickup truck, turned right onto Woodward Avenue, and continued driving northbound on Woodward Avenue. Law enforcement pursued ESCARENO in the pickup truck northbound on Woodward Avenue with Victim 1 driving alongside the pickup truck. The pickup truck then suddenly turned left onto Apple Lane (during this period of time, ESCARENO in his pickup truck struck Victim 1's government vehicle for a second time). Victim 1 abandoned pursuit to relocate his vehicle to the intersection of Woodward Avenue and Ridge Lane in another attempt to block a potential exit for ESCARENO in the pickup truck. Meanwhile, other law enforcement officers continued pursuit of the pickup truck as it fled westbound on Apple Lane. The pickup truck then turned left (south) onto a pedestrian walkway and grassy area

in between apartment buildings until returning to a paved road and turning left (east) on Ridge Lane (effectively driving in a loop). As the pickup truck approached Woodward Avenue, it struck the rear of Victim 1's government vehicle (for a third time), which had relocated there as described above, despite there being sufficient room to avoid Victim 1's vehicle. ESCARENO continued north on Woodward Avenue. Below is a map depicting ESCARENO's approximate path of travel, with the approximate starting point represented by a blue circle, green representing ESCARENO's approximate first loop, red representing the approximate second turn onto Woodward Avenue, and the three blue Xs representing the three approximate locations of vehicle strikes.



7. While traveling north on Woodward Avenue, the pickup truck eventually jumped a curb into bushes near Apple Lane where it came to a stop, as represented by the red X in the map above. ESCARENO exited the vehicle and was arrested.

8. Below is a photograph depicting the pickup truck jumped on the curb upon the end of ESCARENO's flight:



9. Below are photographs depicting some of the damage to Victim 1's government vehicle:



10. After his arrest and upon his arrival at HSI, ESCARENO was read his *Miranda* rights, which he waived. ESCARENO provided a recorded statement, for which a full translation has not yet been completed; however, a law enforcement officer fluent in Spanish heard ESCARENO acknowledge during that statement that ESCARENO was trying to flee and that he swerved in his efforts to flee from police/immigration authorities.


11. During these events, Victim 1 was engaged in the performance of his official duties. Victim 1 was employed as a Federal Agent for Immigration and Customs Enforcement, an officer of the United States, and was working in an official capacity as designated in Title 18, United States Code, Section 1114.

12. Based on the foregoing, I respectfully submit that there is probable cause to believe that on or about October 1, 2025, at Woodridge, Illinois, in the Northern District of Illinois, Eastern Division, MIGUEL ESCARENO DE LOERA, forcibly assaulted, resisted, opposed, impeded, and interfered with an officer of the United States, as designated in Title 18, United States Code, Section 1114, more

specifically an ICE ERO Deportation Officer, who was engaged in the performance of his official duties, and, in doing so, ESCARENO used a deadly and dangerous weapon, all in violation of Title 18, United States, Code Section 111(a) & (b).

FURTHER AFFIANT SAYETH NOT.

MATTHEW E
DAOUD

 Digitally signed by MATTHEW E
DAOUD
Date: 2025.10.02 16:09:39 -05'00'

MATTHEW E. DAOUD
Special Agent, Homeland Security
Investigations

SWORN TO AND AFFIRMED by telephone October 2, 2025.



Honorable HEATHER K. MCSHAIN
United States Magistrate Judge