

UNITED STATES DISTRICT COURT
for the
Northern District of Iowa

United States of America)
v.)
) Case No.
) 26-CR-04006
RAUL TORRES-OLIVAREZ)
a/k/a Raul Torres-Olivares)
)

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 February 4, 2026 in the county of Woodbury County in the
Northern District of Iowa, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1326(a) and (b)(1)	illegal re-entry as a felon

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



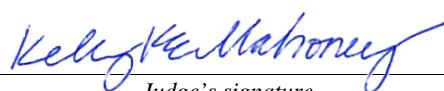
Complainant's signature

ICE/DO Jack E. Brannaker

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/06/2026



Judge's signature

City and state: Sioux City, Iowa

Kelly K.E. Mahoney, Chief U.S. Magistrate Judge

Printed name and title

AFFIDAVIT OF DEPORTATION OFFICER JACK E. BRANNAKER

I, Jack E. Brannaker (affiant), after being duly sworn, depose and state as follows:

AGENT BACKGROUND

1. I am a duly appointed Deportation Officer (DO) with the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), I have been employed with this agency since January 2023. On April 27, 2023, I graduated from the Enforcement and Removal Operations Deportation Officer Training Program. I was trained on immigration laws, policies, and procedures located at the Federal Law Enforcement Training Center in Glynco, GA. Before I was employed with ICE, I was employed with the United States Border Patrol from 2018 to 2023. I am responsible for conducting criminal and civil investigations of violations of the Immigration and Nationality Act (INA), which relate to an alien's right to presence and employment in the United States.
2. All the statements and information contained in this affidavit are based upon my review of investigative reports prepared by law enforcement officers with knowledge of the facts recited, upon my conversations with law enforcement officers having personal knowledge of the pertinent facts, and upon my review of official documents and records maintained by the United States. Based thereon, all of the statements and information contained herein are true and correct to the best of my knowledge, information, and belief.

3. The information contained in this affidavit does not include all of the facts I know about this investigation. Rather, it contains only the facts necessary to establish probable cause to believe that Raul TORRES-Olivarez aka Raul TORRES-Olivares (hereafter “defendant”) has violated Title 8 U.S.C. §§ 1326(a), 1326(b)(1).

FACTS ESTABLISHING PROBABLE CAUSE

4. On January 01, 2026, Sioux City ICE ERO received information regarding defendant’s unlaw status to be present in the United States from a Department of Homeland Security database ELITE (Enhanced Leads Identification & Targeting for Enforcement), which included photographs, demographics, and possible addresses of residency.

5. On February 04, 2026, defendant was found in Sioux City, Iowa, which is in the Northern District of Iowa. ICE ERO officers were conducting surveillance at [REDACTED] Sioux City, IA 51106, a known address of defendant. Officers observed defendant walking out of the address and enter the driver’s seat of a 2012 Nissan Altima, Iowa plate No. [REDACTED]. Officers observed defendant leaving the address in the vehicle and officers proceeded to activate emergency lights to conduct a vehicle stop. Defendant failed to yield to the emergency lights and officers continued to follow at a safe distance. Officers then activated emergency sirens along with the emergency lights, and an officer attempted to pass defendant on the left side after he appeared to slow down to get in front of the vehicle to attempt a box in maneuver. While passing, defendant appeared to intentionally veer the

vehicle he was driving into the right side of the officer's vehicle, which deployed airbags and caused significant damage to both vehicles. Due to the accident, all vehicles involved came to a stop and defendant exited the vehicle he was driving and fled on foot. ICE officers exited their vehicles while wearing body armor with clear visible police markings and commanded defendant to stop. After a short foot pursuit, defendant fell to the ground and officers attempted to conduct the arrest. Defendant physically resisted arrest and would not comply with commands. While resisting arrest, handcuffs were placed on defendant despite physically resisting. Defendant was placed under arrest in Sioux City, Iowa, which is in the Northern District of Iowa. Once officers were back to the scene of the accident, an interview was conducted where defendant admitted his full name was Raul TORRES-Olivarez, or spelled Raul TORRES-Olivares.

6. As a result of the arrest, defendant was brought to the Sioux City ICE ERO office, where his fingerprints were scanned and electronically submitted into the Department of Homeland Security's Automated Biometric Identification System (IDENT) and the Federal Bureau of Investigations Integrated Automated Fingerprint Identification System (IAFIS). A positive match of fingerprints identified defendant as Raul TORRES-Olivarez aka Raul TORRES-Olivares. I was able to verify, identify, and locate a unique DHS alien registration file. Defendant's alien registration file contains photographs, fingerprints, and immigration documents identifying defendant as a citizen and national of Mexico. Alien

registration file records, databases, and indices revealed that defendant was removed from the United States prior to being found in the Northern District of Iowa on or about February 04, 2026. The records also confirmed that defendant is an alien who has been removed from the United States to Mexico on four (4) previous occasions; May 11, 2011, November 17, 2022, July 08, 2023, and December 01, 2023. A search of DHS indices failed to produce any record of an application for lawful entry or lawful admission into the United States by or on the behalf of defendant.

7. After review of defendant's criminal history, it was discovered that on April 14, 2006, in Case No. CR03-38, defendant was convicted of manslaughter in the District Court of Dakota County, Nebraska, and sentenced to 20 years prison. This is a felony offense.

CONCLUSION

8. Based on the foregoing facts, and my experience and training, probable cause exists that defendant violated Title 8, United States Code, Sections 1326(a) and 1326(b)(1), in that defendant, an alien previously convicted of a felony offense, who was found in Sioux City, Iowa, after having been last removed from the United States on December 01, 2023, and returned to the United States without having first obtained the consent of the Secretary of Homeland Security prior to his return.

DATED this 6th day of February 2026.



Jack E. Brannaker
Deportation Officer
Immigration and Customs Enforcement

SUBSCRIBED and SWORN to before me this 6th day of February 2026.



Kelly K.E. Mahoney
Chief United States Magistrate Judge
Northern District of Iowa