



UNITED STATES DISTRICT COURT

for the

Central District of California

UNITED STATES OF AMERICA,

v.

DARWIN JONATHAN RIVERA-FLORES,

Defendant

Case No. 2:26-mj-05043-DUTY

**AMENDED 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(s) of November 4, 2025, in the county of Los Angeles in the Central District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 1015(e)
52 U.S.C. § 20511(2)(A)

Offense Description

False Claim to U.S. Citizenship
Fraudulent Voter Registration

This criminal complaint is based on these facts:

Please see attached affidavit.

🖱️ ⚙️ Continued on the attached sheet.

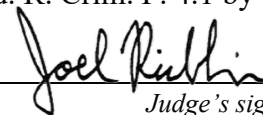
Complainant's signature

Christopher Kuzma, 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: 08/26/2026



Judge's signature

City and state: Los Angeles, CA

The Hon. A. Joel Richlin, U.S. Magistrate Judge

Printed name and title

AUSA: Michael G. Wheat

AFFIDAVIT

I, Christopher Kuzma, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant for DARWIN JONATHAN RIVERA-FLORES ("RIVERA-FLORES") for a violation of 18 U.S.C. § 1015(e) (False Claim to U.S. Citizenship) and for a violation of 52 U.S.C. § 20511(2) (A) (Fraudulent Voter Registration).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement and public databases. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not purport to set forth all 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 part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent ("SA") with the United States Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"), and have been so employed since August 2025, following my reemployment after retirement in August 2023. Prior to my reemployment, I served as a federal Special Agent in Los Angeles, California, from 1997 to 2023 with HSI and the United States Department of State, Diplomatic Security Service.

Throughout my career, I investigated federal criminal violations including narcotics trafficking, bulk cash smuggling, alien smuggling, child exploitation, identity theft, false statements, passport fraud, and regularly participated in the execution of arrest and search warrants.

III. STATEMENT OF PROBABLE CAUSE

4. DHS records reveal that RIVERA-FLORES was born on September 2X, 1995, in Choloma, Cortes, Honduras, and is a native and citizen of the Republic of Honduras, who entered the United States in 2002 and is present in the United States as a Lawful Permanent Resident ("LPR"). LPRs are not United States citizens.

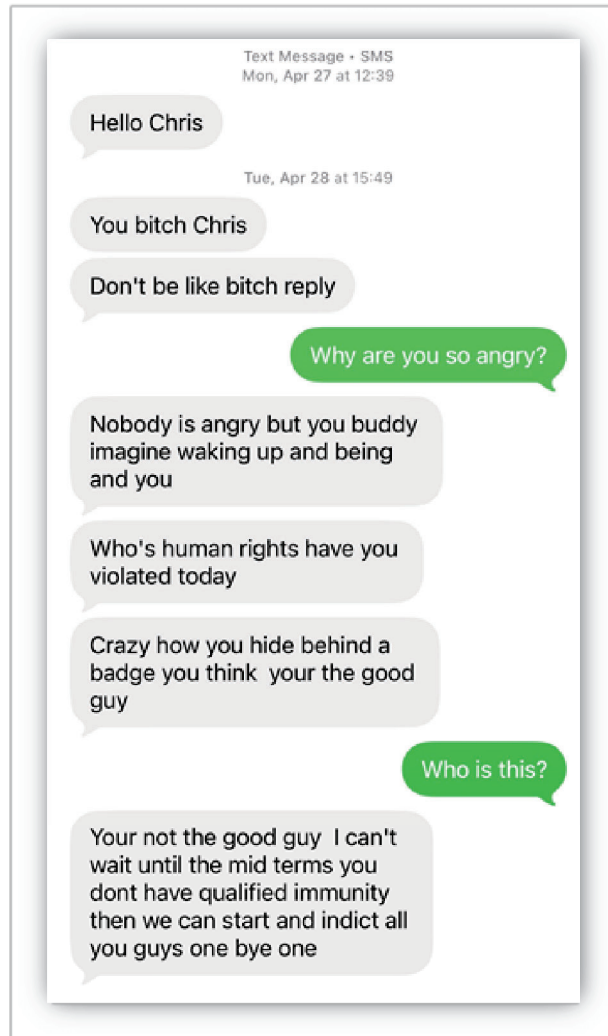
5. In February 2026, DHS Enforcement and Removal Operations ("ERO") personnel in Camarillo, California (CA) notified HSI agents of RIVERA-FLORES physically disrupting DHS personnel and operations at the federal building located in Camarillo, CA. ERO Mission Support Specialist L.M. was blocked from gaining access to the federal facility. HSI investigated the disruption reports. As a result of this investigation, on February 18, 2026, HSI agents issued a Central Violations Bureau ("CVB") citation to RIVERA-FLORES for violation of Title 6, C.F.R., § 139.35(d) (obstruction of access to a federal building), a Class C misdemeanor. In a post-Miranda interview, I informed RIVERA-FLORES that he was being issued a citation to "correct [his] bad behavior." RIVERA-FLORES ultimately pled guilty to the offense and was placed on one year unsupervised probation under U.S. Probation.

6. On March 27, 2026, the ERO employee, L.M., reported

to me that RIVERA-FLORES confronted him/her near the federal building in Camarillo, CA. L.M. said that RIVERA-FLORES "threatened to find my neighborhood, find my house and not to worry...find me." L.M. called the local police and reported the incident. It should be noted RIVERA-FLORES approached this L.M. after CVB citation issuance but before a mandatory CVB court date scheduled on May 2, 2026.

7. On April 8, 2026, I attempted to call RIVERA-FLORES, but his phone didn't accept calls from blocked numbers. So, I unblocked my caller identification feature on my government issued phone and again called RIVERA-FLORES' cellular telephone ending in x3547 in an attempt to schedule an interview with RIVERA-FLORES. The purpose of the interview was to gain a better understanding of the March 27, 2026, encounter between RIVERA-FLORES and L.M., the ERO employee. I spoke to RIVERA-FLORES and explained there has been another incident at the federal building in Camarillo and requested to interview RIVERA-FLORES regarding the incident. RIVERA-FLORES declined to be interviewed.

8. Beginning on April 27, 2026, I began to receive text messages from unfamiliar telephone numbers to my government issued telephone. The text messages generally centered on anti-immigration enforcement. One text message from an unknown voice over internet protocol ("VOIP") phone number referenced qualified immunity and the upcoming midterm elections:



Based upon my education, training and experience, and the reference to the upcoming elections, I believe this message demonstrates RIVERA-FLORES has both an interest in the voting process and an intent to participate in the election process.

9. On July 22, 2026, I received another text message on my government phone with the words, "What was the word you use correct their behavior." Based on my prior post CVB issuance interview of RIVERA-FLORES in February 2026, I believe this text message was from RIVERA-FLORES because it refers back to the exact terms I used in the post-arrest interview of RIVERA-FLORES following the CVB issuance (emphases added):

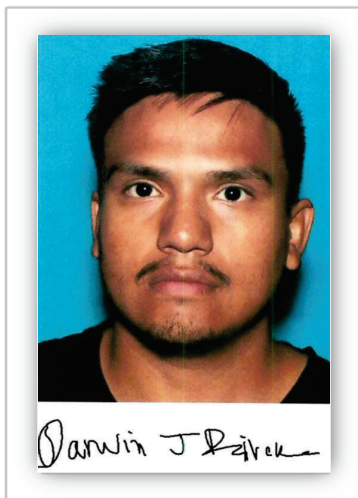


10. Based upon the initial CVB citation and RIVERA-FLORES confronting L.M., I conducted additional investigation. I performed a number of record checks through law enforcement databases. A DHS database revealed a record under Alien Registration number A094-298-XXX in the name "Darwin Jonathan Rivera" also known as "Darwin Rivera" with a date of birth of September 2X, 1995, country of birth and citizenship as Honduras. This record includes a photograph of the person I recognize to be RIVERA-FLORES. This recognition is based on my comparison to other law enforcement photographs of RIVERA-FLORES

and my personal interactions with RIVERA-FLORES. This record also lists additional identifying information for RIVERA-FLORES to include a physical address (Hatillo Ave, Winnetka CA 91306), a telephone number ending in x3547, an email of milodarwinrivera1995@XXX.com, and date of birth of September 2X, 1995.

11. Federal Bureau of Investigation records for RIVERA-FLORES also list his birth country, and citizenship, as Honduras, contains a Social Security number ending in xX930, and a driver's license number B819XXXX.

12. I also conducted record checks through the California Department of Motor Vehicles and confirmed that driver's license number B819XXXX is associated with the name "Darwin Johathan Rivera Flores" and is associated with the same address on Hatillo Avenue, Winnetka, CA 91306. The latest issue date of this record is September 10, 2025, and it contained a photograph which I believe depicts RIVERA-FLORES based on my comparison to videos, pictures, and my personal interactions with RIVERA-FLORES. This record also shows a date of birth as September 2X, 1995, and contains an image of RIVERA-FLORES' signature.



13. I also conducted several record checks through other public databases, including the California Secretary of State website. This record check disclosed an online voter registration record in the name of "Darwin Rivera" associated with the same address on Hatillo Ave, Winnetka, CA 91306.

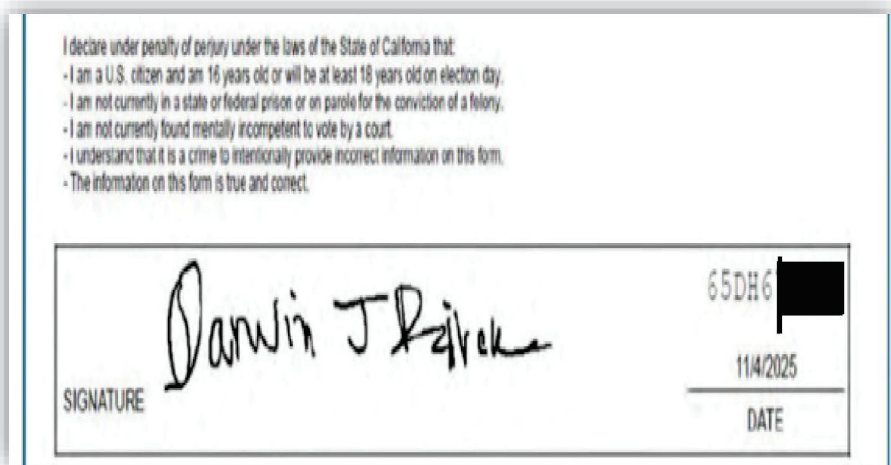
14. In July 2026, I received a certified voter registration application/affidavit number 65DH67XXX, a voter registration receipt and a signature image from the California Secretary of State, Elections Division. The voter registration name is listed as "Darwin J Rivera" and lists the same address on Hatillo Ave., Winnetka, CA 91306. Under the application question of "Did someone help you fill out this form" the answer "no" is checked. A check mark is provided next to the application wording "I am a U.S. citizen."

15. Following a declaration under penalty of perjury warning, the voter registration application is dated November 4, 2025.

16. The voter application also provided the following for Darwin J Rivera:

- a. California ID number B819XXXX
- b. Date of birth as "September 2X, 1995"
- c. Place of birth as "United State of America"
- d. "SSN4"¹ as "X930"
- e. Phone number as "XXX-XXX-3547"
- f. Email as "milodarwinrivera1995@XXXX.com"

17. The signature supplied by the voter and attached to voter application number 65DH67XXXX is in the name of Darwin J



Rivera and appears to match RIVERA-FLORES' signature on his California driver's license dated September 2025.

18. In August 2026, I received certified voter registration records from County of Los Angeles, Office of the

¹ I understand this to be a reference to the last four numbers of an individual's social security number.

County Counsel, under voter ID number 53153XXXX in the name of "Darwin J Rivera" and executed on November 4, 2025, through an online portal. These records list the following:

- a. Residence as "XXXX Hatillo Ave Winnetka 91306"
- b. Birth date as "09/2X/1995"
- c. Birthplace as "United States of America"
- d. Email as "milodarwinrivera1995@XXXX.com"
- e. Phone number "(XXX)XXX-3547"

19. This voter registration form also shows a checkmark next to the phrase "I am a U.S. Citizen."

Voter Registration Form

CALIFORNIA VOTER REGISTRATION FORM		
	☒ I am a U.S. citizen.	
	☒ I am at least 15 years old.	
	☒ I am not in prison or on parole for the conviction of a felony.	
	☒ I am not currently judged by a court to be mentally incompetent.	
Legal Name Darwin J Rivera	Birth Date 09/21/1995	Birth Place UNITED STATES OF AMERICA
Home Address HATILLO AVE WINNETKA CA 91306	California ID B819	SSN4 1930
Mailing Address	Phone Number ()547	Fax Number
	Email Address Milodarwinrivera1995@.com	
I would like my voter materials in the following language		

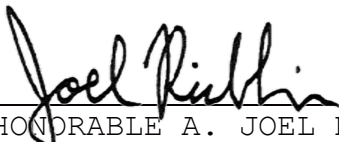
20. Additionally, I have reviewed DHS records to determine whether RIVERA-FLORES has ever sought or obtained U.S. citizenship. To become a naturalized U.S. citizen an applicant must file a Form N-400 and pay a \$710 filing fee or seek a fee waiver. DHS records do not show any application or fee payment/waiver from RIVERA-FLORES seeking naturalization.

Moreover, the records do not reflect the issuance of a Form N-550, a Certificate of Naturalization, which is an official document issued by U.S. Citizenship and Immigration Services to prove that a foreign national has officially become a U.S. citizen after completing the naturalization process and taking the Oath of Allegiance. Based on my background, training and experience, I know that if an individual became a naturalized citizen, DHS records associated with that individual would reflect the issuance of a Form N-550 (Certificate of Naturalization).

IV. CONCLUSION

21. Based on the forgoing, I believe there is probable cause to believe that RIVERA-FLORES knowingly and willfully falsely stated under oath that he was a United States Citizen in his voter registration application in order to register to vote and secure the issuance of an election ballot permitting him to vote in a California and federal election in violation of 18 U.S.C. § 1015(e) and 52 U.S.C. § 20511(2)(A).

Attested to by the applicant in
accordance with the
requirements of Fed. R. Crim.
P. 4.1 by telephone on this
26th day of August 2026.



THE HONORABLE A. JOEL RICHLIN
United States Magistrate Judge