

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Chloe Renae Freeman

Case: 2:26-mj-30525  
Assigned To : Unassigned  
Assign. Date : 8/28/2026  
Description: CMP USA V. SEALED  
(DJ)

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 May 28, 2026 in the county of Washtenaw in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. 752(a)

*Offense Description*  
Instigating or Assisting Escape, a misdemeanor offense

This criminal complaint is based on these facts:  
See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: August 28, 2026

City and state: Detroit, MI



*Complainant's signature*

Michael Wagner, Special Agent, FBI

*Printed name and title*



*Judge's signature*

Honorable Kimberly Altman, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Michael Wagner, being first duly sworn, hereby states as follows:

1. I am a Special Agent with the FBI and have been since December 2022. I received training in investigative techniques and procedures at the FBI Academy in Quantico, Virginia, and have employed these techniques and experiences to investigate a wide array of crimes. As a federal agent, I am authorized to investigate violations of laws of the United States, and as a law enforcement officer, I am authorized to execute arrest warrants issued under the authority of the United States.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of a criminal complaint and arrest warrant for Chloe Renae FREEMAN, for a violation of 18 U.S.C. §752(a), Instigating or Assisting Escape of Person Under Arrest, a misdemeanor offense. This affidavit is based on: (a) my personal knowledge, training, and experience; and (b) information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. I have not included every fact known to law enforcement related to this investigation.

3. Chloe Renae FREEMAN is a 33-year-old U.S. citizen who resides in Whitmore Lake, Michigan. In January 2023, Freeman began working for Trinity

Health Ann Arbor Hospital as a registered nurse and she was so employed on May 28, 2026.

4. As more fully described below, on May 28, 2026, at approximately 11:32 p.m. EST, FREEMAN knowingly and willfully assisted in the escape of an individual with the initials OBP (full name known to law enforcement), an illegal alien subject to removal or deportation from the United States, from the Trinity Health Ann Arbor Hospital. OBP had been administratively arrested pursuant to process and authority issued under the laws of the United States and was in custody of United States Border Patrol Agents at that time.

#### **PROBABLE CAUSE**

5. On May 28, 2026, United States Border Patrol Agents conducted a targeted immigration enforcement operation in Ann Arbor, Michigan for OBP. OBP was identified as a native and citizen of Mexico who had previously been removed from the United States on or about December 12, 2022, from Nogales, Arizona, and had not obtained the permission from the Attorney General of the Secretary of Homeland Security to re-apply for admission to the United States following his removal on December 12, 2022.

6. At approximately 9:00 p.m., agents identified and approached OBP near the intersection of Washtenaw Ave. and Pittsfield Blvd in Ann Arbor,

Michigan. After the agents identified themselves and approached OBP, he fled from the agents, tripped over a curb, fell down and hit his face on the pavement. After agents placed OBP into custody, they observed blood coming from his head. Agents rendered first aid to OBP for lacerations on the bridge of his nose and a small contusion on his forehead. Agents also contacted Emergency Medical Services (EMS) for further evaluation. Shortly thereafter, EMS arrived and rendered first aid to OBP. EMS determined that OBP required additional medical evaluation and transported him to Trinity Health Hospital Ann Arbor.

7. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to process and authority issued under the laws of the United States, specifically the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, U.S. Code, to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.

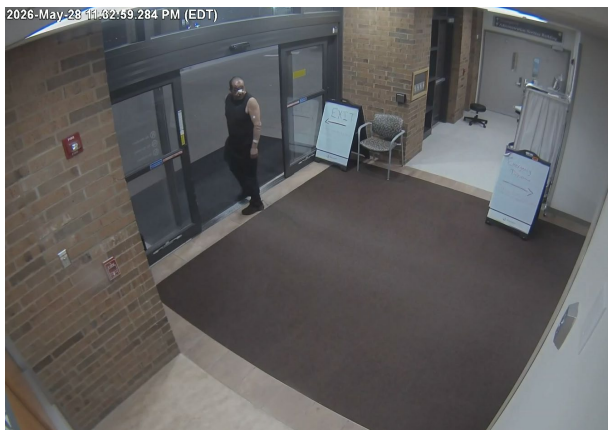
8. Registered Nurse H.C., who was working at Trinity Health Ann Arbor Hospital on May 28, 2026, indicated that she received OBP from EMS and read the EMS patient form that indicated OBP was brought in by Immigration and Customs Enforcement (ICE). Nurse H.C. checked OBP into the emergency

department and observed ICE Agents accompanying him into the hospital. After evaluation by medical staff, a computed topography (CT) scan was ordered and Nurse H.C. transported OBP to the CT scan room. Nurse H.C. stated that the CT scan room was located next to the ambulance bay. After transporting OBP to the CT scan room, she departed to another area of the hospital.

9. Interviews of CT technical operators confirmed that OBP completed a CT scan. Under normal protocols, upon completion of the CT scan, a CT technical operator transports the patient back to their room. However, the CT technical operator recalled that on May 28, 2026, two nurses, one being Chloe FREEMAN, came to the CT scan room and told the operator to hold OBP and not return him to his room. Shortly thereafter, FREEMAN returned to the CT scan room and retrieved OBP.

10. Badge swipe data from Trinity Heath Hospital showed that on May 28, 2026, at 11:31:51 p.m., FREEMAN swiped the 2<sup>nd</sup> Floor CT Room 2738 door to gain access to the CT room where OBP was located.

11. Security video footage then showed OBP exiting the hospital through the ambulance bay doors on May 28, 2026, at 11:32:59.484 p.m. EDT. Law enforcement have been unable to locate OBP since his escape from Trinity Health Ann Arbor Hospital.



*[OBP Exiting Trinity Health Hospital]*

12. On or about June 18, 2026, Trinity Health Ann Arbor Hospital investigators interviewed Chloe FREEMAN. During the interview, FREEMAN admitted to letting OBP leave the hospital. She said she knew OBP was an ICE custody patient, but she claimed she did not believe OBP was in custody at the time because the ICE agents were not physically with him in the CT room. FREEMAN stated she removed OBP's IV and escorted him out the ambulance bay doors. FREEMAN told the interviewers that she did not agree with ICE separating people from their families and that she knew she "was going to set him free". She acknowledged that due to his injuries, he could have died.

13. When FREEMAN escorted OBP out the ambulance bay doors, she did so prior to completion of his hospital care and prior to the time he was properly discharged from the hospital. Accordingly, probable cause exists that FREEMAN'S actions were knowingly and willfully taken to assist custodial

patient OBP in escaping the hospital without permission or authority.

### **CONCLUSION**

14. Based on the above information, there is probable cause to believe that, within the Eastern District of Michigan, Southern Division, Chloe FREEMAN knowingly and willfully instigated, aided, or assisted the escape or attempt to escape from Trinity Health-Ann Arbor Hospital, of OBP, who had been arrested and detained by Border Patrol Agents, pursuant to the process and authority issued in sections 1357, 1225, 1226, and/or 1231 of Title 8, U.S. Code, to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens, in violation of Title 18, United States Code, Section 752(a), which is a misdemeanor offense.



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Michael Wagner, Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me in my  
presence and/or by reliable electronic means.



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Honorable Kimberly Altman  
United States Magistrate Judge

August 28, 2026