

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 26-mj-79 (DJF)

STATE OF MINNESOTA)
)
COUNTY OF HENNEPIN) UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Richard Berger, being duly sworn, do hereby state as follows:

INTRODUCTION & AGENT BACKGROUND

1. I am Special Agent with the U.S. Homeland Security Investigations, Department of Homeland Security (HSI) and have been so employed since September 2009. I am a graduate of the Federal Law Enforcement Training Center, which consisted of the Criminal Investigator Training Program, and U.S. Immigration and Customs Enforcement Special Agent Training.

2. Prior to working with HSI, I was employed as a U.S. Customs and Border Protection Officer for approximately four years. During my career, I have conducted and participated in multiple investigations involving the unlawful importation and the distribution of controlled substances, the assault and hinderance of federal officers while engaged in the performance of their official duties, fraud and identity theft violations, export violations, financial crimes, illegal alien smuggling and human trafficking violations, child pornography, and various immigration violations. During these investigations,

I have conducted physical surveillance, executed arrest and search warrants, reviewed tape-recorded conversations, and personally interviewed numerous sources of information as well as confidential sources.

3. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Dominique BOUDREAUX for forcibly assaulting, resisting, opposing, impeding, intimidating, or interfering with federal officers in performance of their official duties, in violation of Title 18, United States Code, Section 111(a).

4. This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review of reports, written materials, and recordings at the writing of this affidavit. This affidavit does not include all of the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

PROBABLE CAUSE

5. On January 17, 2026, Federal Protective Services ("FPS") Officers and U.S. Customs and Protection ("CBP") Officers were assigned to provide security for the Bishop Henry Whipple Federal Building at 1 Federal Drive, Fort Snelling, MN. Approximately 200 individuals were observed entering the street in front of the federal building. This area was also in front the entrance to the parking lot of the building, where federal government employees and

federal government vehicles entered during and in the course of official duties. FPS issued commands for the crowd to move out of the street.

6. CBP Officers, wearing the standard issue navy uniform with police and agency markings, began moving forward towards the crowd to remove the crowd from the street and to secure the federal building and its entrance. As they approached the crowd, a female wearing a spiderman costume and gas mask, later identified as Dominique BOUDREAUX, was standing in the street and was yelling aggressively at the approaching officers.

7. As CBP Officers approached BOUDREAUX to remove the crowd from the street, BOUDREAUX made physical contact CBP officers and forcibly shoved the officers. CBP officers gave verbal commands to BOUDREAUX to back up. BOUDREAUX again forcibly shoved another CBP Officer.

8. BOUDREAUX was placed under arrest for violation of Title 18, United States Code, Section 111(a).

CONCLUSION

9. Based on the information set forth above, there is probable cause to believe that the Defendant Dominique BOUDREAUX forcibly assaulted, resisted, opposed, impeded, intimidated, or interfered with federal officers in performance of their official duties, in violation of Title 18, United States Code, Section 111(a).

Further your Affiant sayeth not.

A handwritten signature in blue ink, appearing to read 'Richard Berger', is written over a horizontal line.

Richard Berger
Special Agent, HSI

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime
and email pursuant to Fed. R. Crim. P. 41(d)(3) on
January 26, 2026

A handwritten signature in blue ink, appearing to read 'Dulce J. Foster', is written over a horizontal line.

DULCE J. FOSTER
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA