

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

Investigative – Filed Under Seal

v.

Case No. 26-mj-085 (DJF)

MOUSTAPHE YOUSOUF

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Count 1: On or about January 21, 2026, in the State and District of Minnesota, the defendant **Moustaphe Yousseuf** (YOB 1997), did forcibly assault, resist, oppose, impede, intimidate, or interfere with a person designated in 18 U.S.C. § 1114, namely, special agents of the United States Immigration and Customs Enforcement Homeland Security Investigations, who were engaged in, and on account of, the performance of official duties, all in violation of Title 18, Section 111(a).

I further state that I am a special agent with the HSI, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature

Richard Berger, Special Agent, HSI

Printed name and title

Sworn to and signed before me, by reliable electronic means (Zoom and box on USAfx), pursuant to Fed. R. Crim. P. 41(d)(3),

Date:

1-26-26

City and State: Minneapolis, MN



Judge's Signature

Dulce J. Foster

United States Magistrate Judge

Printed Name and Title