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NO. 4:25-MJ-00078

I, Adam Rosboschil, a Deportation Officer (DO) with the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), being duly sworn, depose and state as follows:

I am a DO with DHS, ICE, Enforcement and Removal Operations (ERO) assigned to the Philadelphia Field Office. I have been a DO since June 2023 and have accumulated 2 years of training and experience in the enforcement of the immigration and naturalization laws of the United States. My responsibilities in this role include identifying, locating, apprehending, and removing migrants who are in violation of the Immigration and Nationality Act (INA).

This affidavit is submitted in support of an application for a criminal complaint and arrest warrant charging Dominique HARRIS with violations of Title 18, United States Code, Section 111 (a), Assaulting, Resisting and Impeding Federal Officers.

STATEMENT OF FACTS

On November 30, 2025, while conducting an ICE enforcement operation in Williamsport, PA, HARRIS arrived at the TJ MAXX parking lot in Williamsport, PA and began to converse with the target of the ICE operation. Both HARRIS and the target began to drive in the direction of the target's known residence. HARRIS followed behind the target in her car. A traffic stop was initiated at the intersection of Walnut St and Memorial Ave, Williamsport, PA 17701 to apprehend the target. HARRIS parked her car next to our traffic stop in the opposing lane blocking traffic going the other way. HARRIS then exited the vehicle and began to scream obscenities and act irate.

Once the target was detained and secured, HARRIS drove away in her car, opening up the opposing lane. Minutes later, ICE officers vacated the scene. HARRIS returned to the scene as ICE was driving away and she began to drive erratically and attempted to tailgate SDDO Campbell's government vehicle within inches of her bumper in what looked like an attempt to strike the ICE vehicle. HARRIS followed ICE officers, riding SDDO Campbell's bumper, back to the ICE Williamsport Sub-Office where she attempted to gain access to the secure parking lot. SDDO Campbell blocked her from entering by parking her ICE vehicle where the gate opens. HARRIS began blowing her horn excessively and then HARRIS exited her vehicle at the main gate of secure parking. SDDO Campbell then told her it was a secure lot and she would not be permitted to enter. HARRIS then approached the SDDO Campbell while screaming obscenities and aggressively closing the gap between them and then proceeded to spit on SDDO Campbell, hitting her shirt and upper thigh. ICE Officers then attempted to restrain HARRIS who was combative and physically resistant. All the while she was screaming obscenities and racial slurs. While I was attempting to assist with handcuffing, HARRIS turned her head and spit on me at close range, hitting my chest.

Once HARRIS was cuffed, ICE officers began to escort her to a holding cell on site until local law enforcement could respond. While escorting HARRIS, she was screaming obscenities and refusing to walk. Upon placing HARRIS in a holding cell, she began kicking the door and continuing to scream and be irate. I was wearing my agency issued body camera to corroborate these statements.