

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

NEKIMA VALDEZ LEVY-
 ARMSTRONG a/k/a "Nekima Valdez
 Levy-Pounds," CHAUNTYLL LOUISA
 ALLEN, WILLIAM SCOTT KELLY a/k/a
 "DaWokeFarmer," [REDACTED]

Case No. 26-mj-40-DLM

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about **January 18, 2026**, in **Hennepin County**, in the State and District of Minnesota, the above-named defendants conspired to injure, oppress, threaten, and intimidate the rights of other persons secured by Federal Law, namely, the free exercise of religion at a place of religious worship secured by the FACE Act, 18 U.S.C. § 248(a)(2), all in violation of Title 18, United States Code, Sections 241 and 248(a)(2).

I further state that I am a Special Agent of the Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE) Homeland Security Investigations (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

SUBSCRIBED and SWORN before me
 by reliable electronic means (FaceTime
 and email) pursuant to Fed. R. Crim. P.
 41(d)(3)


 Complainant's signature

Timothy Gerber, DHS-ICE Special Agent
 Printed name and title

Date: January 20, 2026City and State: St. Paul, MN


 Judge's Signature
 Douglas L. Micko
 United States Magistrate Judge
 Printed Name and Title