

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No: 26-mj-54 SGE

STATE OF MINNESOTA)
)
) ss.
COUNTY OF RAMSEY)

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 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 Madeline TSCHIDA (XX/XX/2001) for assault of a federal officer 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 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 16, 2026, at approximately 1030 hrs Officers with the United States Immigration and Customs Enforcement (ERO) were conducting surveillance operations in the vicinity of Monticello, MN.

6. While performing surveillance, a group of eight to 10 vehicles began to park around the officers making it difficult for them to leave the area. The drivers of the cars got out and approached the officers yelling and blowing

whistles. The officers warned the vehicles' drivers not to impede their operations.

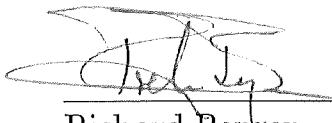
7. One of these people was Madeline TSCHIDA. TSCHIDA got out of her car and approached the officers refusing to heed their commands to step back from them. Officers arrested TSCHIDA for impeding operations.

8. Officers then placed TSCHIDA in the back of a transport vehicle in handcuffs. While in the transport vehicle, TSCHIDA kicked open the rear door of the car striking an Immigration and Customs Enforcement Officer in the side of his leg. TSCHIDA fled the vehicle. Officers pursued TSCHIDA, detained, and arrested her for forcibly assaulting, resisting, opposing, impeding, intimidating, or interfering with a federal officer in violation of Title 18, United States Code, Section 111(a)

CONCLUSION

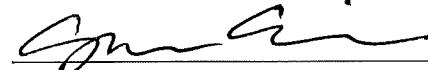
9. Based on the information set forth above, there is probable cause to believe that Madelin TSCHIDA forcibly assaulted, resisted, opposed, impeded, intimidated, or interfered with officers in performance of their official duties, in violation of Title 18, United States Code, Section 111(a).

Further your Affiant sayeth not.



Richard Berger
Special Agent, HS

SUBSCRIBED and SWORN before me
by reliable electronic means via FaceTime
and email pursuant to Fed. R. Crim. P. 41(d)(3) on
January 23, 2026



SHANNON G. ELKINS
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA