

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
26-mj-56 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 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 Christina RANK for forcibly opposing, impeding, 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 time of 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 12, 2026, Immigration and Customs Enforcement (“ICE”) Enforcement and Removal Operations Deportation Officers (“DOs”) were conducting immigration operations on or about the Inver Grove Heights area of Minneapolis. The DOs were parked in a vehicle in the parking lot of 9015 Broderick Blvd, Inver Grove Heights. Both DOs were wearing their issued vest carriers which identified them as law enforcement.

6. A woman, later identified as Christina RANK, approached them in a separate car and asked them if they were ICE. The DOs left the parking lot in their vehicle and RANK tailed immediately behind them in her vehicle.

7. After a short drive on the public roadways and with RANK following immediately behind, the officers attempted to re-enter the parking lot they were previously in. RANK then drove into oncoming lane and across the parking lot entrance at the same time the DOs were turning their vehicle into the parking lot entrance. As a result, RANK's vehicle blocked the entrance. By driving into the opposite lane and in front of the DOs' car while the DOs were simultaneously entering the parking lot, RANK caused a collision with the DOs' car.

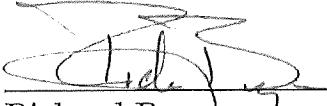
8. RANK was arrested and transported to the Whipple Federal Building for processing.

9. During a post-*Miranda* interview, RANK admitted that she had followed the DOs out of the parking lot, drove from behind the DOs to the front as the DOs attempted to re-enter the parking lot, and sought to block the DOs from re-entering the parking lot.

CONCLUSION

10. Based on the information set forth above, there is probable cause to believe that the Defendant, Christina RANK forcibly opposed, impeded, 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.



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 23, 2026



SHANNON G. ELKINS
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA