

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
26-mj-70 (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. 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 Quentin Carter WILLIAMS 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, my training and experience and that of my fellow law enforcement officers, 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 sufficient information to establish probable cause.

PROBABLE CAUSE

5. On January 7, 2026, at approximately 3:00 PM, federal law enforcement conducted operations in and around Minneapolis and Saint Paul, Minnesota, within the District of Minnesota.

6. During these lawful operations, federal law enforcement officials executed a probable cause arrest on a person who had used a vehicle to ram a U.S. Border Patrol vehicle near Roosevelt High School in Minneapolis.

7. During that probable cause arrest, a crowd began to form around federal law enforcement officers who were engaged in the probable cause arrest related to the above vehicle incident. The crowd then began to obstruct law enforcement and impede their ability to perform their duties in effectuating that probable cause arrest.

8. In doing so, one crowd member, Quentin Carter WILLIAMS, a suspected employee at Roosevelt High School, began to push and shove members of federal law enforcement who were engaged in performing their lawful duties.

9. WILLIAMS knew himself to be pushing and shoving federal law enforcement officers because these officers wore uniforms and drove marked vehicles.

10. Then Border Patrol Agent 1 observed WILLIAMS grab and attempt to pick up Border Patrol Agent 2 while Border Patrol Agent 2 worked to restrain another disruptive member of the crowd. Border Patrol Agent 1 then placed WILLIAMS under arrest for assaulting Border Patrol Agent 2.

CONCLUSION

Accordingly, there is probable cause to believe that Defendant Quentin Carter WILLIAMS, violated Title 18, United States Code, Section 111(a)(1), and that the act involved physical contact with the victim or the intent to commit another felony.

Affiant states nothing further.



Richard Berger
Special Agent, HIS

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