

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
26-mj-71 (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 William VERMIE (DOB: XX/XX/1986) 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.

#### **FACTS SUPPORTING PROBABLE CAUSE**

5. On January 13, 2026, Immigration and Customs Enforcement (ICE) conducted targeted enforcement operations near XXX5 Park Ave.,

Minneapolis, MN. While Deportation Officers (DO) were escorting an arrested subject to a vehicle, a crowd formed.

6. Law enforcement officers created a barrier in a "V" formation while the subject was moved to the vehicle. The crowd was screaming, yelling and blowing whistles while pushing up against the line of officers. The DO issued commands to the crowd to get back. William VERMIE aggressively ran toward the line of law enforcement officers. The DO, with his arms outstretched, commanded VERMIE to get back. Instead, VERMIE struck the DO's hand in a forcible downward motion. The DO repeated the command for VERMIE to retreat and outstretched his arms again. VERMIE again struck the DO.

7. The DO then attempted to arrest VERMIE who struggled, resisted, and pushed against multiple DOs until his arrest could be effectuated.

## CONCLUSION

8. Based on the information set forth above, there is probable cause to believe that the defendant, William VERMIE, violated Title 18, United States Code, Section 111(a)(1) by forcibly assaulting, resisting, opposing, impeding, intimidating, and interfering with a person

designated in section 1114, while engaged in the performance of their official duties.

Respectfully submitted,

  
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