

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 26-mj-59 (JFD)

STATE OF MINNESOTA)
) UNDER SEAL
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 Matrim James CHARLEBOIS for assault of a federal officer in violation of Title 18, United States Code, Section 111(a) and for the damaging of government property in violation of Title 18, United States Code, Section 1361.

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 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 13, 2026, at approximately 1:00 p.m., CHARLEBOIS stepped in front of an approaching federal law enforcement sport utility vehicle (LE SUV) at the main entrance of the Whipple Federal Building, located at 1

Federal Drive, St. Paul, Minnesota, 55111. The LE SUV was property of the United States.

6. CHARLEBOIS, accompanied by her brother, obstructed the vehicle's path, causing agents to stop the LE SUV approximately 50 feet from the entrance.

7. Upon stopping, officers activated the vehicle's law enforcement lights and sirens for approximately 30 seconds before exiting to initiate contact with CHARLEBOIS, who was using a metal cane for mobility assistance. Officers issued repeated verbal commands for CHARLEBOIS to move, which were disregarded. CHARLEBOIS actively resisted officers by use of forcible physical contact. She was subsequently moved aside and taken to the ground to allow the LE SUV to enter federal property.

8. After the vehicle passed, officers began returning to the LE SUV. At this time, CHARLEBOIS began to stand up behind the vehicle and with two hands, swung the metal cane toward an officer, narrowly missing the back of the officer's head. CHARLEBOIS then rapidly approached the rear passenger side of the LE SUV. With a two-hand grip on her cane, CHARLEBOIS swung and struck the LE SUV multiple times, until Federal Protective Service (FPS) and officers from the LE SUV responded and detained her.

CHARLEBOIS repeatedly hit the body of the vehicle owed by the United States with her forceful swinging.

CONCLUSION

9. Based on the information set forth above, there is probable cause to believe that the Defendant, Matrim James CHARLEBOIS 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). In addition, Defendant Matrim James CHARLEBOIS willfully damaged property of the United States in violation of Title 18, United States Code, Section 1361.

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



JOHN F. DOCHERTY
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA