

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
26-mj-80 DJF

STATE OF MINNESOTA )  
                         ) ss. Richard Berger  
COUNTY OF HENNEPIN )

**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 Joshua DOYLE for 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 21, 2026, at approximately 10:45 a.m., Agents assigned to Homeland Security Investigations (HSI) were conducting immigration enforcement operations on an identified target near DuPont Avenue N and Colfax Avenue N, in Minneapolis, MN. Agents, including Victim 1, an HSI Special Agent, were conducting surveillance to locate the identified target.

6. Agents were parked on the street in an unmarked government vehicle when DOYLE approached agents and began taking photos of the vehicle. DOYLE walked in front of Victim 1's vehicle and crouched down.

DOYLE then put his hands on Victim 1's vehicle which caused agents concern, believing that DOYLE may have planted a tracking device. Victim 1 gave DOYLE a verbal warning to not touch the government vehicle. A crowd began to form, and agents decided to leave the area. As agents were attempting to leave the area, DOYLE stood in front of the vehicle preventing agents from leaving. Victim 1 activated the lights and sirens on the government vehicle and attempted to drive away but DOYLE stood in front of the vehicle.

7. Victim 1 then exited the vehicle wearing body armor with Police/Law Enforcement markings on the front and back. As Victim 1 exited the vehicle he dropped his cell phone. DOYLE then stated, "you dropped your cell phone." When Victim 1 attempted to pick up his cell phone from the ground DOYLE forcibly kicked Victim 1, striking Victim 1's hand.

8. Victim 1 then attempted to place DOYLE under arrest for a violation of 18 U.S.C. § 111(a). DOYLE disobeyed Victim 1's commands, tensed his body up, pulled his hands away and resisted arrest by engaging in a "tug of war" with federal agents who were attempting to take him into custody. When other officers attempted to secure DOYLE in the officer's car, DOYLE continued to actively resist arrest, including flailing his legs and using his knees to impede officers from placing him in the vehicle. Agents eventually placed DOYLE under arrest.

## CONCLUSION

9. Based on the information set forth above, there is probable cause to believe that the Defendant, Joshua DOYLE forcibly assaulted, resisted, opposed, impeded, intimidated, or interfered with a federal officer in performance of official duties, and the act(s) involved physical contact with Victim 1, in violation of Title 18, United States Code, Section 111(a).



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 26, 2026



DULCE J. FOSTER  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MINNESOTA