

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
26-mj-062 (ECW)

STATE OF MINNESOTA)
) ss.
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 a Special Agent (SA) 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 received training on and 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, 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 Abgikadir NOOR for assault of a federal officer using a deadly or dangerous weapon in violation of Title 18, United States Code, Section 111(a) and (b).

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 12, 2026, federal officers with United States Immigration & Customs Enforcement, along with other law enforcement partners, conducted a targeted enforcement operation in Saint Cloud, within the District of Minnesota.

6. While officers were clearing a path through the parking lot so their vehicles could pass, a crowd of several hundred people rushed the

officers. This crowd then began to assault and berate the federal officers.

7. While attempting to (a) defend themselves and (b) manage the crowd, officers saw a black male wearing all black clothing, later identified as Abgikadir NOOR, throw a brick at a federal officer.

8. The officers then worked to apprehend NOOR who resisted them by running and, once caught, by grappling with officers in an attempt to avoid being handcuffed. But the officers ultimately secured NOOR's arrest.

9. Based on my training and experience and that of my fellow agents involved in this investigation, a brick thrown at a person is necessarily converted from a building material to a deadly or dangerous weapon.

[Intentionally left blank.]

CONCLUSION

Based on the above facts, there is probable cause to believe that Defendant Abgikadir NOOR, violated Title 18, United States Code, Sections 111(a)(1) and (b) by forcibly assaulting, resisting, opposing, impeding, intimidating, and interfering with federal officers designated in 18 United States Code, Section 1114 while engaged in, or on account of, the performance of their official duties, and that such acts involved the use of a deadly or dangerous weapon.

Affiant states nothing further.



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



ELIZABETH COWAN WRIGHT
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF MINNESOTA