# UNITED STATES DISTRICT COURT

for the

District of Oregon

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United States of America v.  GINOVANNI JOSEPH BRUMBELOW		)	Case No.	3:25-mj-0016	3		
Defen	idant(s)	,					
507 St. • 480	CRIMINAL	L CON	<b>IPLAINT</b>				
BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS							
I, the complainant	in this case, state that the fol	lowing is	true to the be	est of my knowle	dge and belief.		
181 U.S.	June 14, 2025	100		y of Mu	1000	in the	
	of Oregon			lated:			
Code Section				Description			
18 U.S.C. Section 111(a)	J.S.C. Section 111(a) Assault on a Federal Officer						
	plaint is based on these facts: of Federal Bureau of Investig		pecial Agent	, i			
<b>♂</b> Continued on the	he attached sheet.		/o/ by	nhana nurayant	to Ead B Crim	D 44	
			/S/ Dy	phone pursuant	TANCET WEST CONTRACTOR TO THE	P. 4.1	
				)A	s signature		
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City and state: Portland, OR U.S. Magistrate J						man	
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DISTRICT OF OREGON, ss:

AFFIDAVIT OF

## Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, being duly sworn, do hereby depose and state as follows:

#### **Introduction and Agent Background**

- I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have 1. 2022. As a Special Agent of the FBI, I am authorized to investigate and been since enforce violations of the laws of the United States, collect evidence in cases in which the United States is or may be a party in interest, and perform other duties imposed by law. My current assignment is with the FBI Portland Field Office,
- 2. I submit this affidavit in support of a criminal complaint and arrest warrant for GINOVANNI JOSEPH BRUMBELOW, for Assaulting a Federal Officer in violation of 18 U.S.C. § 111(a)(1). As set forth below, there is probable cause to believe, that GINOVANNI JOSEPH BRUMBELOW committed Assaulting a Federal Officer (Felony), in violation of 18 U.S.C. § 111(a)(1).
- 3. The facts set forth in this affidavit are based on the following: my own personal knowledge; information obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of

Affidavit of Page 1 records related to this investigation; communication with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, it does not set forth each fact that I or others have learned during this investigation.

### **Applicable Law**

4. 18 U.S.C. § 111(a)(1) makes it an offense to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in 18 U.S.C. § 1114 while engaged in or on account of the performance of official duties. Persons designated in § 1114 include any officer or employee of the United States or of any agency in any branch of the United States government while such officer or employee is engaged in or on account of the performance of official duties, and any person assisting such an officer or employee in the performance of official duties. Under § 111(a), simple assault is a misdemeanor, but where the assaultive acts involve physical contact with the victim, the offense is a felony punishable by imprisonment up to 8 years.

## **Statement of Probable Cause**

5. Since June 4, 2025, protests have occurred at the U.S. Immigration and Customs Enforcement (ICE) field office located at 4310 S Macadam Ave in Portland, Oregon. During daylight hours, some of the attendees at the demonstration have harassed both ICE clients and employees by following them with cameras making disparaging remarks and threatening statements, including stating that they know where the target lives or that they will find the target of harassment. Many of these individuals dress in all black clothing, commonly referred to as

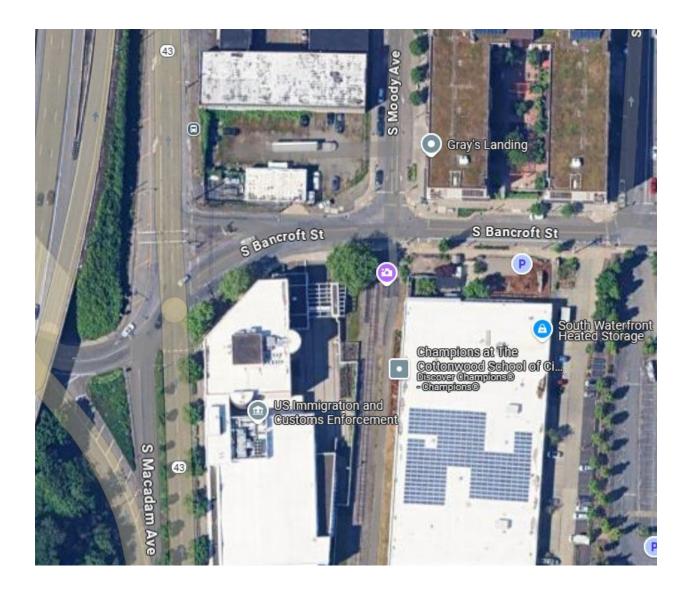
Affidavit of Page 2 "black bloc." Black bloc can prevent identification of individual actors by authorities. After nightfall, the attendees generally become more aggressive, damaging personal and government property, throwing items toward federal law enforcement officers, and at times physically assaulting officers. The violence towards officers has included discharging pepper spray at officers as well as throwing rocks, trash, and bricks pulled from the ICE facility's driveway. Photos of the front of the ICE facility are below:



6. On June 14, 2025, thousands of people engaged in peaceful protests in Portland, Oregon. At approximately 1 p.m., individuals began gathering around the ICE building. Many were dressed in black bloc and some were wearing masks. Some targeted the building with mortar fireworks, rocks, bricks, and glass bottles. Fires were also started in multiple locations in close proximity to the building. At approximately 5:50 p.m., individuals breached the exterior door to the ICE building and entered the lobby before being pushed back by federal officers. Additional federal officers, including Customs and Border Protection Tactical Unit (BORTAC) agents, were dispatched to the location. At approximately 6:30 p.m., the Portland Police Bureau (PPB) announced a riot declaration was in effect via sound truck to an assembled crowd of

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protesters, an estimated 300-400 individuals, for the areas near S Moody Avenue and S Bancroft Avenue. A map of the affected area is pictured below.



7. At or around 8:00 p.m., Adult Victim (AV), a BORTAC Agent, was assisting with arresting a protest participant who had been throwing rocks at officers. He felt a sharp pain in the back of his head. AV let go of the individual he was arresting and observed an unidentified male protest participant holding a wooden stake with a sign attached with a pointed

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end directed at him. AV described the male as white, slim build, with long hair, wearing both a green and black sweatshirt, black jeans, black shoes, and a painter's mask. This individual was later identified as GINOVANNI JOSEPH BRUMBELOW. Still frames of the surveillance footage that captured the incident are below, with blue arrows indicating the position of BRUMBELOW and red arrows indicating the position of AV:



8. AV then grabbed BRUMBELOW and was assisted by another officer in taking BRUMBELOW into custody. BRUMBELOW was subsequently booked into the Multnomah County Detention Center and charged with one count of 18 U.S.C. § 111(a)(1).

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9. AV sustained a wound on the back of his head, as shown below.



## Conclusion

- 10. Based on the foregoing, I have probable cause to believe, that GINOVANNI JOSEPH BRUMBELOW committed Assaulting a Federal Officer (Felony), in violation of 18 U.S.C. § 111(a)(1). I therefore request that the Court issue a criminal complaint and arrest warrant for GINOVANNI JOSEPH BRUMBELOW.
- 11. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by an Assistant United States Attorney (AUSA), and the AUSA advised me that in their opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

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### Request for Sealing

#. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may cause destruction of or tampering with evidence, cause intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

> By phone pursuant to Fed. R. Crim. P. 4.1 Special Agent, FBI

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at

a.m./p.m. on June 16 , 20 25 9:02

United States Magistrate Judge

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