AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

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United States of America v.)	Case No. 3:25-mj	-171		
JUNIPER PERRY WEED)				
Defendant(
	CRIMINAI					
BY TELEPHO	ONE OR OTHER	RELIA	ABLE ELECTI	RONIC M	EANS	
I, the complainant in the	nis case, state that the following	lowing is	true to the best of n	ny knowledge	e and belief.	
On or about the date(s) of	June 18, 2025		in the county of _	Multn	omah	in the
District of	Oregon	, the def	endant(s) violated:			
Code Section			Offense Descrip	ption		
18 U.S.C. § 111(a)(1) 41 CFR § 102-74.385		Assaulting a Federal Officer, Class A Misdemeanor Failure to Comply with Official Signs and Directions				
					Certified to be a true copy of original filed Dated: 06/20/2025 MELISSA AUBIN U.S. District Court By: s/Eric Oss	in this District
This criminal complaint is based on these facts:					Pages_1_Through	7
See Affidavit of FBI SA	attached hereto and	l incorpor	rated by reference			
♂ Continued on the at	tached sheet.					
				Via teleph	one	
				Complainant's s	ignature	
				, S Printed name a	pecial Agent, F	BI
Attested to by the applicant in telephone at <u>5:25</u> a.m./p.i Date: June 19, 2025	1	nirements	of Fed. R. Crim. 19.	A.1 by Judge's signa	CKLVML ature	7
City and state:	Portland, OR		Hon. Stacie F.			Judge
			·	Printed name a	nd title	

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

1.	I am a Special Agent with the Federal Bureau of Investigation (FBI) and have
been since	April 2023. My current assignment is

These include the investigation of violent crimes and major offenses such as threats to human life, threats to national infrastructure, efforts to use violence in support of, or to counter a particular ideology, acts of violence impacting interstate commerce, crimes against children, and other violent criminal matters. My training and experience include a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting criminal complaints, and probable cause.

- 2. I submit this affidavit in support of a criminal complaint and arrest warrant for JUNIPER PERRY WEED for Assaulting a Federal Officer, in violation of 18 U.S.C. § 111(a)(1), and Failure to Comply with Official Signs and Directions, in violation of 41 CFR § 102-74.385 ("Target Offenses"). As set forth below, there is probable cause to believe, and I do believe, that WEED committed Assaulting a Federal Officer, in violation of 18 U.S.C. § 111(a)(1) and Failure to Comply with Official Signs and Directions, in violation of 41 CFR § 102-74.385.
- 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

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.

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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 18 U.S.C. § 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 18 U.S.C. § 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.
- 5. 41 CFR § 102-74.385 provides individuals must conform with official signs and directions. Persons in and on property must at all times comply with official signs of a prohibitory, regulatory or directory nature and with the lawful direction of Federal police officers and other authorized individuals.

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Statement of Probable Cause

June 2025: Protests at the Portland ICE Building

6. For over two weeks in June 2025, protesters have assembled in front of and around the Immigration and Customs Enforcement (ICE) building located at 4310 SW Macadam Avenue, 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 that they know where the target lives or that they will find the target of the harassment. Many of these individuals dress in all black clothing, commonly referred to as "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, and throwing items toward federal law enforcement officers working at the building. The violence toward officers has included discharging pepper spray at officers as well as throwing rocks, trash, and bricks pulled from the ICE facility's driveway.

June 18, 2025: Protesters Erect Barricade on Federal Property

7. On June 18, 2025, at approximately 6:38 PM (all times hereinafter are Pacific Standard Time), Federal Protective Service (FPS), Immigration and Customs Enforcement (ICE), and Border Patrol officers were informed that approximately six official vehicles were in route to 4310 SW Macadam Avenue, which required the facility's gate to be opened for vehicles to enter. A crowd of people with masks, goggles, and ad-hoc shields lined up in the driveway of the ICE facility on federal property facing the facility vehicle gate. Using a Long-Range Acoustic Device, FPS announced the following message to the crowd, "This is the Federal

Protective Service. The facility is closed and not open to the public. Stay out of the area of the driveway to allow for vehicular traffic. Remain on the sidewalk or across the street. Anyone, to include the press, trespassing on federal property is subject to arrest." Officers opened the gate and advanced on the protestors at a slow rate to allow for compliance.

Federal Officers move to clear trespassers

8. The gate was opened and a line of officers including members of FPS and Customs and Border Protection Tactical Unit (BORTAC) advanced on the crowd to clear the driveway for entering law enforcement vehicles. The crowd had organized themselves in a line with shields facing the officers. When the two lines met in the driveway some of the trespassers dispersed, but a portion of the trespassers pushed against the officers or held firm in place.

Weed assaults federal officers and resists arrest

9. FPS Inspectors and Border Patrol Agents made up a line and advanced to clear the driveway. A confrontation ensued between protesters and Federal law enforcement officers and another protestor and law enforcement attempted to take that protestor into custody. An individual, later identified as JUNIPER PERRY WEED, pushed officers in an attempt to free the other protestor from lawful custody. Law enforcement told WEED that she was under arrest and attempted to take WEED into custody as WEED resisted. WEED flailed her arms violently in an attempt to break free, causing one of the officers (Adult Victim 1) to fall to the ground and incur minor knee injuries. The officers regained control over WEED and continued toward the ICE facility.

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10. While being escorted down the driveway to the holding area, WEED again became combative and flailed violently against restraint, causing the officers to fall to the ground again before being brought back under control and taken to the holding area.

Document 7

11. The officer who suffered minor knee injuries provided photographs of the injury site and described the injuries as swollen and painful 24 hours after the assault. The photographs are below.



Conclusion

- 12. Based on the foregoing, I have probable cause to believe, and I do believe, that JUNIPER PERRY WEED committed Assaulting a Federal Officer, in violation of 18 U.S.C. § 111(a)(1), and Failure to Comply with Official Signs and Directions, in violation of 41 CFR § 102-74.385. I therefore request that the Court issue a criminal complaint and arrest warrant for JUNIPER PERRY WEED.
- 13. 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, 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.

Request for Sealing

14. 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.

> /s/ Signed by Telephone Special Agent, FBI

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

a.m./p.m. on

United States Magistrate Judge