

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

25 MAG 2272

UNITED STATES OF AMERICA

v.

BASS NDIAYE,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 111(a)(1) and
(b)

COUNTY OF OFFENSE:
NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

Jose Nieves, being duly sworn, deposes and says that he is a Special Agent with Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE
(Assaulting an Employee of the United States)

1. On or about July 18, 2025, in the Southern District of New York and elsewhere, BASS NDIAYE, the defendant, knowingly and forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with a person designated in Title 18, United States Code, Section 114, while engaged in and on account of the performance of official duties, and in doing so, had the intent to commit another felony and used a deadly and dangerous weapon, to wit, at 26 Federal Plaza in New York, New York, NDIAYE forcibly assaulted ICE officers, among others, while the officers were engaged in the performance of their official duties, by attacking the officers with a pair of scissors.

(Title 18, United States Code, Sections 111(a)(1) and (b).)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

2. I am a Special Agent with HSI and have been personally involved in the investigation of this matter. I based this complaint on my participation in the investigation, as well as on my conversations with other law enforcement agents and other individuals, my examination of various reports, photographs, and records, and my training and experience. Because this complaint is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my training and experience, I am aware that ICE employs Supervisory Detention and Deportation Officers (SDDOs), Deportation Officers (DOs), Special Agents, and security guards whose official duties include providing security services at federal government

facilities. The security guards are security officers employed by a private company awarded a security contract by ICE who act under the direction of ICE.

4. Based on my participation in this investigation, my review of law enforcement reports and records, and my conversations with law enforcement officers, I have learned among other things, the following:

a. On or about July 18, 2025, at approximately 6:00 p.m., several ICE security guards were preparing heated meals for detainees being processed and held at 26 Federal Plaza in New York, New York (the “Processing and Holding Room”). The security guards used scissors to open the meal packaging.

b. On or about that same time, two security guards arrived to transport more than a dozen people being detained in the Processing and Holding Room to an immigration detention center. BASS NDIAYE, the defendant, was removed from a cell for transport.

c. Shortly thereafter, one of the security guards observed NDIAYE jabbing himself with a pair of scissors that had been left unattended near the meal packaging.

d. NDIAYE began slashing the scissors in the air and wielding them as a weapon, moving aggressively toward one of the SDDOs and the approximately dozen other detainees in the room, among others.

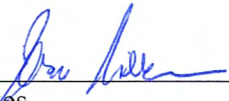
e. An ICE Assistant Field Office Director in the room immediately called for assistance in disarming NDIAYE. Two SDDOS and three DOs ran into the room to provide assistance, and they ushered some detainees to safety.

f. NDIAYE continued moving aggressively toward the individuals who remained in the room with him, including several detainees, the security guards, the SDDOs, and the DOs, and repeatedly attempted to stab them.

g. NDIAYE then ran aggressively at an HSI Special Agent in the room. The Special Agent—who was unarmed—attempted to defend himself with a milk crate.

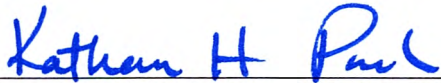
h. NDIAYE changed course and tried to escape out of a window. Unable to break through the window, NDIAYE was cornered by several ICE officers, including a SDDO and a DO, who were able to secure the scissors and restrain NDIAYE.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of BASS NDIAYE, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



Jose Nieves
Special Agent
Homeland Security Investigations

Sworn to before me this 21 day of July, 2025



THE HONORABLE KATHARINE H. PARKER
United States Magistrate Judge
Southern District of New York