

## **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Matthew Henderson, Task Force Officer, United States Department of Justice, Federal Bureau of Investigation (FBI), being duly sworn, state:

### **I. INTRODUCTION**

1. I am a Border Patrol Agent-Intelligence with the United States Border Patrol (USBP) Havre Sector Intelligence Unit and assigned to the FBI Beartooth Safe Streets Task Force for the Billings, Montana Resident Agency. I have been a Border Patrol Agent since 2010. During this time, I worked in Yuma, Arizona for six years, where I conducted routine uniformed patrol responsibilities and investigated drug and human smugglers. From March 2015 through September of 2016, I was assigned to the Yuma County Narcotics Task Force as a drug investigator. During that time, I conducted dozens of drug trafficking investigations. In that capacity, I have taken part in cooperating witness interviews, cooperating defendant interviews, and debriefs with confidential human sources. From November 2016 to October 2018, I was assigned to the FBI Joint Terrorism Task Force in Billings, where I assisted FBI Special Agents with a variety of complex federal investigations, including drug trafficking, alleged terrorism, human trafficking, and financial crimes. In October 2018, I began

working with the FBI Big Sky West Transnational Organized Crime Task Force ( BSTOCWTF) focusing on investigating complex Drug Trafficking Organizations (DTOs). In 2023 the BSTOCWTF changed its designation to the Beartooth Safe Streets Task Force, which is a FBI initiative designed to investigate criminal street organizations, DTOs, violent gangs and weapon offenses. The information contained in this affidavit is based on my own observations, training and experience and information provided to me by other task force members or other law enforcement officers.

2. Throughout my career, I have discussed with numerous law enforcement officers, cooperating defendants and informants, the methods and practices used by gang members and narcotics distributors, and I am familiar with their typical methods of operation, including, the manufacturing, distribution, storage and transportation of narcotics and the collection of money which represents the proceeds of narcotics trafficking and money laundering.

## **II. DESCRIPTION**

3. This Affidavit is submitted in support of a Criminal Complaint issued for LANE MATTHEW DEMARAIS alleging Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841(a)(1). The statements in this Affidavit pertain to the investigation described below and are based in part on information provided by my own observations and

experience as an FBI Task Force Officer, and the observation and experiences of other fellow law enforcement officers participating in the investigation. This Affidavit does not purport to contain all facts related to this investigation, but only those facts necessary to establish probable cause with respect to the aforementioned offense.

### **III. PROBABLE CAUSE**

4. In May 2025, agents from Eastern Montana High Intensity Drug Trafficking Area Task Force (EMHIDTA) conducted a proffer interview with two individuals that admitted to obtaining methamphetamine from Lane DEMARAIS. One of the individuals described DEMARAIS having a primary address and a second location where he would store drugs and firearms. At the second location he had placed a safe to secure the drugs and firearms.

5. In the fall of 2025, the EMHIDTA investigated an individual who was found to be in possession of approximately four ounces of methamphetamine. This individual agreed to submit to questioning and stated that the methamphetamine had been supplied to them by Lane DEMARAIS. Agents obtained a search warrant for this individual's cell phone. Agents reviewed text messages in the Fall of 2025 between a phone number identified as being utilized by DEMARAIS and this individual. DEMARAIS and the individual reference drug amounts, money owed and where they should meet. Additional messages of

interest from DEMARAIS include: "Can you drive out to my mom's real fast if you want to...I'm just saying if you still need help", "please go the speed limit remember if you go the speed limit they don't have any reason to pull you over if you're not speeding you're fine...", "I'm leaving my mom's in about 10 minutes okay?", "I'm happy laying on my mom's couch and stacking money right now" and "I'm leaving my mom's heading to Samantha's." Agents identified his mother's residence in Laurel, MT. Agents identified DEMARAIS' current girlfriend as Samantha B. This individual stated that DEMARAIS was extremely paranoid of law enforcement. In the following months, EMHIDTA began investigating DEMARAIS and gathered significant additional information that he was dealing large quantities of methamphetamine that he obtained from California state.

6. In January 2026, agents obtained a Montana District Court Search warrant to affix a tracking device on two vehicles registered DEMARAIS. Agents observed DEMARAIS driving both vehicles. While monitoring the GPS tracking location, agents observed numerous trips at all times of the day and night to his mother's residence in Laurel, MT. On nearly every trip to his mother's home in Laurel, MT the vehicle would take obscure routes that took significantly longer and would traverse rural and remote roads. Your Affiant knows from training and experience that DEMARAIS was conducting "heat runs," which are used by

people involved in criminal activity to detect the presence of law enforcement and to prevent the detection of key locations.

7. On February 3, 2026, agents from EMHIDTA obtained Montana District Court State search warrants for two residences and a storage unit associated to DEMARAIS in Billings, MT and Laurel, MT.

8. During the execution of the search warrants, agents encountered DEMARAIS at his residence on Ave D in Billings, MT where small amounts of methamphetamine and two firearms were seized. Both firearms were located inside a silver Dodge Ram 1500 that is registered to DEMARAIS.

9. A search warrant was then executed at DEMARAIS' mother's residence located on 6<sup>th</sup> Ave in Laurel, MT. DEMARAIS' mother was present. She is approximately 78-years-old and appeared in ill health. The search revealed a small room in the basement with a safe. Agents hired a local locksmith to open the safe which was successfully accomplished. A search of the safe revealed 45 individual packaged bundles of meth weighing approximately 45 pounds in total and several firearms including handguns, shotguns and rifles. Also, inside the safe were mobile devices, large digital scales, drug use paraphernalia and \$31,541 USD. The meth had been pre-packaged in one pound vacuum sealed bags. Under the bags of meth in the safe was a vehicle title form addressed to Lane DEMARAIS. Also, inside the small room, agents located a vacuum sealer and

rolls of vacuum bags that were unused. When asked about the safe, DEMARAIS' mother stated she had no knowledge of the safe and had not been in her basement for some time. She also acknowledged DEMARAIS visited the house and had a key to the residence. She further stated DEMARAIS was allowed to come and go as he wanted.

10. The evidence was seized and transported back to the EMHIDTA office for processing. Your Affiant chose two random bags containing suspected meth for presumptive testing and weight. Both randomly selected bags weighed approximately 450 grams. The white crystal substance in the bags presumptively tested positive for methamphetamine.

### **CONCLUSION**

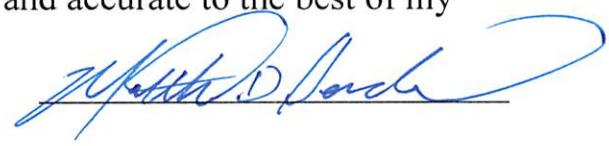
11. Based upon my training, experience, and the totality of the evidence noted herein, Your Affiant believes probable cause exists that LANE DEMARAIS possessed with the intent to distribute methamphetamine – a Schedule II controlled substance – in violation of Title 21, United States Code, Section 841(a)(1), in the State and District of Montana on February 5, 2026.

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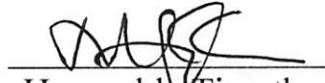
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I swear that the facts presented herein are true and accurate to the best of my knowledge.



Matthew Henderson  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn to before me on the 6th day of February, 2026



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Honorable Timothy J. Cavan  
United States Magistrate Judge  
District of Montana