

An ACLU RESEARCH REPORT

Agents of Chaos and Cruelty:

**How the Trump Administration's National
Deportation Policing Force Has Attacked
American Communities**

ACKNOWLEDGEMENTS

This report is dedicated to the memory of those who have lost their lives following federal immigration enforcement operations — including the more than 50 individuals who have died in Immigration and Customs Enforcement (ICE) detention during the second Trump administration; and at least six individuals who were have been shot and killed by ICE and Customs and Border Protection (CBP) agents: Ruben Ray Martinez, Silverio Villegas González, Isaias Sanchez Barboza, Keith Porter, Jr., Renee Good, and Alex Pretti. We are grateful to the thousands of community members and activists who witnessed, documented, reported, and denounced the civil rights abuses experienced across our country.

The report is a product of the American Civil Liberties Union (ACLU). Principal report authors are Denise C. Bell, consultant to the ACLU, and Naureen Shah, Director of Policy and Government Affairs for Immigration at the ACLU.

Research and review of data was conducted by Denise C. Bell, Mary Sadallah, ACLU Legislative Assistant, and Kate Voigt, ACLU Senior Policy Counsel. Data analysis was conducted by Lizzy Schick, Lead Analyst at ACLU Technology, and Mary Sadallah. Data review was also conducted by Sarah Gardiner and Tobin Williamson, consultants to the ACLU, and Amber Colquhoun, ACLU intern. Jacob Beeders and the Bridging Divides Initiative at Princeton University provided data and analysis and assisted with review. We also thank for their external peer review Caroline Conroy, Brian Haupt, Sarah Krause, Justin Mazzola, David McCraw, Kylie Milliman, Kit O'Connor, Simone Peloquin, Karen Phillippi, Jacob Price, Elizabeth M. Ramey, Sophia Sabeh, Gloria Twesigye, and Rachel Ward.

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EXECUTIVE SUMMARY

By fall 2025, a year since the re-election of President Trump on a promise of mass deportations, life had already changed on Florida's eastern Treasure Coast. Still, what happened to Floridalma Sanchez-Gomez, her family, and her community was remarkable: a young woman tased twice in her own driveway, a residential street flooded with heavily armed law enforcement, a helicopter suddenly overhead, an American teenage neighbor arrested for standing too close to the scene, a child who came home from school to find a broken front door and her family missing.

Floridalma's case exemplifies the growth and operation of a national deportation policing force made up of federal agencies, including Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP), as well as thousands of state and local police, all of which pivoted between purported missions related to law enforcement and immigration — often acting with little public notice. In Florida, beginning in mid-October 2025, Florida Highway Patrol (FHP) coordinated with ICE, CBP, and state agencies on operations on Florida's eastern Treasure Coast.¹

Floridalma, driving home with her two brothers, was caught up in this national deportation policing force. An FHP trooper in an unmarked car began following Floridalma and her brothers, roughly seven blocks from their house in Golden Gate, a largely Hispanic neighborhood in the city of Stuart on Florida's eastern Treasure Coast. The trooper reported following Floridalma because her windows were tinted too dark and she had made a right turn at a red light without coming to a complete stop. He turned on his lights and siren after she started driving 40 mph in a 25 mph zone close to her house. Floridalma drove several blocks before pulling into her own driveway.²

The trooper pulled Floridalma — who is five feet tall — by her shirt as she opened her vehicle door, his Taser already drawn and pointed at her. Grabbing her shoulder, he pressed her against the vehicle. He ordered her in English, a language she does not speak, to put her hands behind her back. Still, Floridalma tried to follow what the trooper was saying, putting an arm behind her back before he pushed her to walk and then pulled her by her shirt collar to move her to another location. Frightened and confused, she turned to run to the house.³

The trooper fired his Taser twice at Floridalma: once into her back and again after she fell to the ground. Her brothers had run into the house. Officers forced their way inside with a crowbar and a sledgehammer to arrest them.⁴

By then, the street no longer looked like a traffic stop. More than a dozen FHP troopers, joined by agents from the Florida Fish and Wildlife Conservation Commission (FWCC), CBP, and ICE, had filled the street within minutes. Some were armed with assault-style weapons. An FHP helicopter monitored the scene. Around nine vehicles surrounded the house and blocked off the street while neighbors gathered and passing drivers slowed to watch. A car kept honking. “Why is the highway patrol pulling someone over in a neighborhood?” a resident asked. “They're supposed to be on the highways. It's total racial profiling.”⁵

A 19-year-old U.S.-citizen neighbor, who was “being very loud and causing a scene” according to FHP, was arrested under Florida's so-called Halo Law for standing too close to the scene. The law requires a 25-

foot buffer around first responders; a trooper reported he paced out how many feet she was from the scene, noting he wore a size 12 shoe. When the neighbor's mother shouted at troopers to let her daughter go, two of them grabbed her arms briefly. "They were trying to manhandle me, but I knew my rights," she said. "We were just out there practicing our First Amendment rights, and they didn't like what we had to say." The daughter was later released on bail.⁶

Floralma's 13-year-old niece came home from school to find no one home, a broken front door, and federal agents standing on the lawn. A neighbor reported, "There was no adult left for her. She was wide-eyed and shaking." Floralma, an asylum seeker with employment authorization, was charged with failure to stop and resisting an officer. She was released on bond. One of her brothers was deported soon after his arrest.⁷

This incident did not get national headlines, just as thousands of others did not in 2025. Even as the killings of U.S. citizens Alex Pretti and Renee Good in Minneapolis inspired tens of thousands of people to peacefully protest, call their members of Congress, and express outrage, communities across the country reeled from the national deportation policing force's abusive actions on their own streets, in their neighborhoods, and against their family members and neighbors — much of which went unnoticed by national media and policymakers.

These lesser-known stories show that the horrific abuses our nation witnessed in Minneapolis were not an aberration — in fact, they are the tip of the iceberg. What happened in Minnesota did not start in Minnesota, and it continues in communities across the United States as ICE and CBP's funding and footprint continues to expand to a degree never before seen.

Report Purposes and Methods

Building on documentation in our litigation and prior reports by the ACLU as well as journalists, members of Congress, and accountability bodies,⁸ the ACLU set out to review federal, state, and local law enforcement conduct in American communities in 2025. We focused on eight states representing a cross-section of the country, and reflecting varying degrees of federal law enforcement presence and personnel surges. These states include Arizona, California, Colorado, Florida, Illinois, Louisiana, Maryland, and New Mexico. We reviewed more than 1,200 reported incidents of federal, state, and local law enforcement officers engaged in potential civil rights violations in these states.

This report is the first in-depth civil rights review of immigration enforcement actions throughout 2025 in these eight states. It builds on prior ACLU litigation, research, and advocacy, as well as congressional investigations, human rights documentation, and investigative reporting that found similar patterns during the same period.

We reviewed a range of law enforcement activity with a nexus to immigration enforcement from January through December 2025, beginning when President Trump took office again. While most of the incidents we reviewed involve apparent attempts to enforce federal immigration law by federal, state, and local

officers, this report also reviews law enforcement actions taken in response to protests outside of immigration detention sites and individuals recording or observing their activities. Most incidents we reviewed occurred on American streets, but we also reviewed arrests at courthouses and ICE field offices. We refer to this law enforcement conduct, for the sake of simplicity, as “immigration enforcement.” Our research focused on who was subject to enforcement, where the enforcement occurred, and how it was carried out, drawn from publicly available information. Our research was not filtered for alleged civil rights violations or unlawful behavior. The Methods section contains further notes on methodology.

Our research was limited in time and resources, and the reviewed incidents represent a small fraction of total reported enforcement activity in 2025, which ICE data shows exploded to unprecedented levels.⁹ The category counts in this report thus represent a conservative threshold.

Even at that floor, the pattern across eight states is unmistakable: What happened in Minneapolis, where federal agents killed U.S. citizens Alex Pretti and Renee Good, was not confined to that location or surge. Understood as part of the thousands of street arrests and law enforcement interactions in the interior of the United States that happened in 2025, these killings were not the excesses of a few rogue officers. They were part of a pattern of civil rights violations arising from immigration enforcement — at a scale and severity without precedent in our nation’s recent history.

Key Findings

Through our review of more than 1,200 incidents of immigration enforcement in 2025 across eight states, we found patterns of misconduct in state after state, in both cities with massive enforcement surges and in communities that never saw significant federal law enforcement deployment. We identified **432** incidents involving misconduct by agents. We define misconduct as the use of force or threatened force, the use of intimidation tactics, and retaliatory actions taken against those observing or documenting enforcement.

Reckless Enforcement in American Communities

As the Trump administration sought to ramp up immigration arrests, it changed the nature of American life — turning sites of daily life into danger zones. We documented **624** instances of enforcement in everyday locations such as neighborhood sidewalks and streets, bus stops, gas stations, grocery stores, malls, wildlife reserves, and roads and highways that people take to go about daily life.

We documented **252** instances of enforcement at places of work such as car washes, restaurants and food stands, landscaping and construction sites, sites where ride-share drivers wait for calls, outside of home improvement stores where daylaborers seek work, and even at a barbershop; **20** of these incidents were identified as worksite enforcement.

Normalizing the Use of Force and Intimidation

The incidents we reviewed indicate agents used force and the threat of force as default tactics and tools to coerce immediate compliance rather than to respond to a threat. Agents also turned to intimidation tactics — bullying, harassing, humiliating, and deceiving people — as they conducted enforcement, creating greater fear in communities and further undermining trust in law enforcement.

We identified **375** incidents involving use of force or threatened force by agents. Of these:

- **241** incidents involved physical force
- **128** incidents involved threatened force, including the brandishing of weapons or verbal threats of weapons or force
- **105** incidents involved weapons, such as batons, Tasers, and flashbang grenades
- **86** incidents involved chemical irritants
- **82** incidents involved agents using their cars, such as by boxing in or hitting other people's cars

We identified situations in which agents:

- Pushed, shoved, tackled, or pinned people **418** times
- Deployed chemical irritants **361** times (including **132** times they were aimed directly at individuals), kinetic impact projectiles such as rubber bullets **75** times (including **50** times they were aimed directly at individuals), flash-bang grenades **59** times, and Tasers **33** times
- Pulled drivers and passengers from their cars **76** times, smashed vehicle windows **47** times, rammed vehicles into people's cars **14** times, and hit people with cars **six** times
- Pressed knees and hands on people's backs and necks **52** times, grabbed people by the neck to pin or drag them **19** times, and used chokeholds **10** times — totalling **81** times that agents used tactics so dangerous that many law enforcement agencies sharply restrict or prohibit them because they can cut off breathing and bloodflow, and become deadly

We identified **119** confirmed or reported injuries to individuals following agents' use of force. Of these injuries, **69** were confirmed by medical visits or legal documentation and the other **50** were self-reported.

The approach was deadly: We reviewed **16** incidents where agents used lethal force. Additionally, we identified **130** instances in which agents brandished weapons and **69** instances in which they verbally threatened the use of weapons or force.

The use of intimidation marked another intentional shift toward tactics that dehumanize targets and bystanders, sowing distrust between communities and law enforcement. We identified **91** incidents involving intimidation. We found that agents:

- Bullied, harassed, or insulted people **87** times
- Used ruses (impersonated others or used other deceptive tactics to trick people) **26** times

Agents at Schools, Shelters, Hospitals, and Other Sensitive Locations

The administration removed long-standing guardrails protecting sensitive locations from enforcement, and turned courthouses back into enforcement sites. Agents operated at or near schools, hospitals, places of worship, and shelters — the locations where agents should have shown the greatest restraint and which, under prior administrations, were termed “protected areas” or “sensitive locations.”¹⁰ They conducted enforcement at courthouses and immigration check-ins, where people were already complying with orders the government had given them. We found **86** total incidents at sensitive locations, including **49** incidents at or near schools and **40** instances when schools went on full or soft lockdowns due to enforcement. We documented **11** incidents at child gathering spaces, such as playgrounds and school bus stops. We also found **91** incidents at immigration and state and county courts, and **80** incidents at immigration check-ins.

BREAKOUT BOX: A reverend in California who confronted an agent making an arrest in his church parking lot was told, “The whole country is our property.”¹¹

Targeting Children and Families

Instead of protecting children, the administration turned their enforcement tools against them, targeting children either individually or as part of families. Agents arrested children, conducted enforcement in front of children, and detained children alongside adults. They chose to conduct enforcement in places children were present — at school pick-ups and drop-offs, during traffic stops, in courthouses — even when they did not need to. This disrupted schools and instilled terror. We found:

- **157** incidents where children were present or targeted. This includes incidents where agents stopped or detained children themselves or where children were present during enforcement actions against others, such as at or near schools, traffic stops, raids of homes, and court appearances and check-ins. This also includes incidents in which children were harmed as a result of agents’ use of force or tear gas, sometimes when they were merely bystanders.
 - Of these, **54** incidents involved agents directly interrogating or detaining children.
 - We identified **214** children who were detained, were targeted for enforcement, or experienced law enforcement misconduct. This includes **32** U.S. citizen children.

No One Was Off Limits

No one was safe from agents in the pursuit of one more detention. Agents targeted people seeking humanitarian protection, and swept up people with healthcare needs and other vulnerabilities. Those whom the government should protect were targeted. As with children, any number is one too many. Agents also targeted individuals with U.S. citizenship, legal status, and humanitarian and related protections permitting them to remain in the United States, as well as individuals who have lived, worked, and built families here for years.

We found more than 200 incidents where such individuals were detained, were targeted for enforcement, or experienced law enforcement misconduct (the use of force or threat of force, the use of intimidation tactics, or retaliatory action). Individuals affected include the below, some of whom belong to one or more of these groups:

- **155** U.S. citizens (including **18** Indigenous people), **30** legal permanent residents or green card applicants, and **10** Deferred Action for Childhood Arrivals (DACA) recipients
- **84** members of mixed-status families, and **81** longtime residents who have lived, worked, and built families in the United States for 15+ years
- **117** asylees or people seeking asylum, **nine** survivors of abuse, crime, or trafficking seeking humanitarian protections, **seven** Temporary Protected Status (TPS) holders or applicants, **six** people who held humanitarian parole, and **two** people with Special Immigrant Juvenile Status (SIJS)
- **39** people with disabilities or medical needs, **24** elderly people, **19** pregnant or nursing people, and **19** people who serve as caretakers for individuals with disabilities or other medical needs

Targeting Community Observers, Protesters, Journalists, and Bystanders as Threats

Agents targeted, used force and intimidation against, and arrested protestors, journalists, clergy, elected officials and their staff, community or legal observers, and other witnesses who posed no threat and were engaged in activities protected by the First Amendment. Of the **150** such incidents we identified:

- **80** incidents involved community or legal observers or other witnesses
- **71** incidents involved protestors, who experienced misconduct individually or as part of groups
- **24** incidents involved journalists
- **23** incidents involved elected officials or their staff
- **7** incidents involved clergy

In retaliation for observing or documenting law enforcement activity, agents often used force against or arrested individuals, or threatened them with force or arrest. Additionally, we identified **31** times that agents photographed or filmed people because they were observing or documenting agents.

Across these incidents, we identified at least 782 total people who were detained, were targeted for enforcement, or experienced law enforcement misconduct, including:

- **568** protestors, individually or as part of groups (when the size of groups was reported)
 - **51 additional groups** of protestors also experienced misconduct, such as use of tear gas or rubber bullets for crowd dispersal (the size of these groups was not reported)
- **118** community or legal observers or other witnesses
- **53** journalists
- **31** elected officials or their staff
- **12** clergy

Racial Profiling As An Operating Practice

ICE and CBP, and state and local officers working with them, relied heavily on racial profiling. People were stopped and detained because of perceived race, ethnicity, spoken language, accent, work, or presence in a particular place. This was not incidental bias at the margins. It was core to how dragnet enforcement functioned in 2025. We found: **437** incidents involving likely racial profiling. This includes **156** incidents in Illinois, **104** incidents in California, **65** incidents in Florida, **34** incidents in Colorado, **26** incidents in Arizona, and **24** incidents in Louisiana, **18** incidents in Maryland, and **10** incidents in New Mexico.

A Culture of Abuse and Broken Accountability

The severity of conduct we have described suggests a systemic breakdown in professional norms and standards, and exposes major gaps in our system of accountability. This was not the result of “a few bad apples” but a culture of abuse, practices designed to evade accountability, and direct orders and encouragement of abuse by senior administration officials.

Agents masked their faces, drove unmarked vehicles, and wore clothing that did not quickly indicate an agency affiliation. With multiple agencies outside ICE redirected to conduct enforcement, these tactics sometimes made it difficult for people to know whether they were being criminally abducted, and made it impossible for victims and bystanders to know who to hold responsible for abuse. They also undermined community trust in local police, since people could not know whether it was local police or federal law

enforcement at a location. We found:

- **372** incidents involved masked agents
- **310** incidents involved agents driving unmarked vehicles
- **255** incidents involved agents who wore vests most prominently labeled POLICE potentially leading the public to misidentify them as local law enforcement. In some cases, these vests did not identify the federal agency, and in others, the federal agency was identified only in small print below the prominent POLICE marking

A broken system of accountability — including a lack of internal mechanisms at the Department of Homeland Security (DHS) as well paths to accountability through the courts — made abuse more likely to recur.

A Blueprint for Authoritarianism

The abuses detailed in this report are about more than immigration. They reveal a blueprint for expanding authoritarian rule in the United States, with profound consequences for everyone in America.

The tactics and rhetoric of the Trump administration reviewed in this report are straight from the authoritarian playbook. They include suppressing protest through the use of force, intimidation, and retaliation, as well as deploying ICE and other federal law enforcement as an internal security force into cities run by the administration's political opponents. The Trump administration's vilification of protestors, elected officials, and even judges as "domestic terrorists" is a calculated move both to suppress opposition and delegitimize checks on its power.

The administration uses racialized, anti-immigrant scapegoating to build power, justify lawless behavior of federal agents, and obscure the wide-reaching harm it is inflicting on Americans across many communities. Viewed from a broader lens, its project of mass deportations is not just a direct instrument of power; it is about defining who belongs in the United States.

Resisting authoritarianism, emerging from our democratic backslide, and future-proofing our democracy all require transformative reform of our immigration system to make it less vulnerable to exploitation.

Our Affirmative Vision and Major Recommendation to Policymakers

The departure of DHS Secretary Kristi Noem and Border Patrol Commander Greg Bovino following widespread protests against immigration agents' abuses has correlated with a slightly slower pace of immigration arrests — a daily average of 1,000 immigration arrests in March 2026, compared to a peak volume of 1,300 daily arrests in 2025 and a norm of around 350 daily arrests in prior administrations.¹²

However, the fundamental nature of the Trump administration's deportation campaign remains in many ways unchanged: ICE and CBP enjoy unprecedented funding and resources, and agents operate without critical policies and mechanisms that previously provided oversight and accountability. Every day brings new accounts of families torn apart, children detained, and community members taken. At the same time,

the Trump administration has accelerated new policies designed to strip thousands of people of legal status — rendering them vulnerable to enforcement and detention in deadly facilities.

Even if tactics built on public spectacle have shifted to less visible operations, they nevertheless exact profound harms on people every day. The reckless, indiscriminate nature of enforcement continues. We should not mistake a quieter performance for a more humane, lawful approach. Trump administration officials have also repeatedly suggested that major enforcement surges will occur in the coming months, with senior official Tom Homan warning, “You ain’t seen shit yet. This year will be a good year. Mass deportations are coming.”¹³

Policymakers looking to future reform should recognize that our immigration enforcement system is broken and dangerous to human life, and corrosive to our democracy. The recurring abuses described in this report show a system in which agents are systematically violating our laws as well as our nation’s most cherished values and ideals. The cruelty and abuse by law enforcement agents in our communities could recur and worsen as DHS’s budget balloons with more unrestrained funding.

Now is the time for policymakers to call for transformative change. Nearly 25 years since DHS was created, it is time for a restart. This is the first in a series of papers and reports through which the ACLU will share our affirmative vision and build the case for this transformative change.

To reduce abuses and reform our nation’s immigration system, we urge policymakers to join us in calling for transformative change:

- Remove the immigration agencies from DHS, which has proven too vast to allow for effective congressional oversight or effective internal agency accountability.
- Build a new system: a cabinet-level Immigration Management Agency oriented toward service, with a mission to keep families together, support American communities, and meet the needs of the American workforce. Reorient the domestic immigration system to effective management — with clear rules to qualify for termination of removal proceedings and lawful status, including a pathway to citizenship for millions of our neighbors and loved ones who are American in every way but on paper. Our democracy cannot survive with an unequal society that deprives millions of Americans of the full rights and protections of citizenship, and leaves them vulnerable to the violence and cruelty of deportation.
- Dismantle the national deportation policing force, which consists of tens of thousands of law enforcement officers who have been diverted from their primary public safety missions to an indiscriminate and unnecessary mass deportation campaign. The extensive record of serious constitutional violations described in this report underscores the dangers that a massive internal security force poses to our communities and our democratic system. Congress should repeal provisions of law that the Trump administration has used to divert federal, state, and local law enforcement from their primary missions to serving ICE, including 8 U.S.C. § 287(g), to effectively prohibit the executive branch from concentrating federal law enforcement personnel, equipment, and resources in a single federal force.
- Ensure that people who are victimized can sue and hold federal law enforcement officers and agencies accountable for abuse, including by enacting the Bivens Act and Constitutional Accountability Act. Ending impunity is critical to preventing future abuse and building a culture of

professional, rights-respecting law enforcement.

Detailed recommendations addressing specific abusive practices are provided in the Recommendations section of the report.

State and local policymakers should act now to protect their communities:

- Limit the participation of state and local agencies in immigration enforcement and take measures to avoid federal commandeering of state resources by designating state-, county-, or city-owned or -operated property as off-limits to immigration enforcement authorities. More generally, enact limits and robust oversight measures for collaboration and deputization between state and federal law enforcement.
- Revise state laws to minimize law enforcement discretion that enables racial, ethnic, and other forms of profiling; explicitly prohibit racial, ethnic, religious, and other forms of profiling; and prohibit employees from requesting information about citizenship or immigration status unless otherwise required by law.
- Break the cycle of impunity for abuses by the national deportation policing force by passing state legislation to authorize civil lawsuits against federal, state, and local officials who commit federal constitutional violations in your state. Increase documentation and monitoring of abuse by passing legislation or issuing executive orders to direct state agencies to establish mechanisms to document, collect, and make an annual report on harms and financial costs to residents of the state arising from immigration enforcement.
- Assist impacted community members, for example by establishing a helpline and providing legal assistance funding to residents who are wrongly prosecuted by the federal government or who are detained on immigration grounds.

THE GROWTH OF A NATIONAL DEPORTATION POLICING FORCE

The abuses we describe in this report arise from changes in the scale and scope of immigration enforcement operations under President Trump. Stephen Miller, White House deputy chief of staff and architect of the Trump administration's mass deportation agenda, has attempted to pressure ICE into meeting a quota of 3,000 immigration arrests a day.¹⁴ DHS has said it wants to achieve 100 million deportations — approaching a third of our nation's population.¹⁵ Its brutal and swift pursuit of this ambition has fundamentally reshaped American life. The Trump administration's pressure to deport millions, coupled with the removal of guardrails and dangerous messages about immunity from prosecution, created the conditions for abuse to flourish.¹⁶

Surging Street Arrests — Beyond Minneapolis

Previously, most immigration arrests took place through custodial transfers from jails and prisons rather than on the street.¹⁷ That changed in 2025.¹⁸ The Trump administration rescinded enforcement priorities that delineated categories of people to be targeted for deportation, and moved away from street operations built around targeting specific individuals.¹⁹ The administration surged thousands of federal agents and officers into communities, and enlisted thousands of state and local police to act as immigration agents during the course of routine police operations.²⁰

Even in areas where major law enforcement personnel surges did not occur, agents were increasingly involved in street operations and arrests of people who were not on a pre-determined target list. The administration claimed to be going after the “worst of the worst” — but its reach has extended to millions of people for whom there is no credible link to a public safety threat.²¹ When a field office director told Miller that agents were working through their list of targets, Miller responded: “There is no list. Everyone is fair game.”²² According to the Deportation Data Project at UCLA and UC Berkeley, street arrests increased elevenfold in the first nine months of 2025.²³ During that same period, more than one in three of the roughly 220,000 people ICE arrested had no criminal record.²⁴ According to ICE's own data, just 5 percent of people taken into custody over the past year had a violent criminal conviction, while the number of people arrested with no criminal conviction at all increased nearly eightfold.²⁵

The Trump administration rescinded agency policies in a successful attempt to drive enforcement at a scale and with an approach unlike anything before. It rescinded the protected areas (previously known as “sensitive locations”) policy that limited immigration enforcement operations at or near schools, hospitals, disaster assistance sites, and other areas where community members need reliable, safe access to services. It removed limited restrictions on courthouse arrests, revoked CBP standards requiring the agency to balance public safety against immigration enforcement when conducting vehicle pursuits, and cut the training designed to prevent the abuses now occurring.²⁶ A secret memo purported to authorize ICE to enter homes without a judicial warrant, in violation of the Fourth Amendment and federal law.²⁷ As described further in this report, DHS gutted its internal oversight bodies because the Trump administration viewed them as “internal adversaries that slow down operations.”²⁸

Billions To Build the National Force

The chaos and cruelty this report describes was also enabled by unprecedented funding from Congress. The One Big Beautiful Bill Act (OBBBA), which Congress passed in July 2025 through an extraordinary, partisan process known as reconciliation, pumped \$170 billion into immigration enforcement over four years.²⁹ ICE's share alone — \$75 billion — nearly triples its annual budget.³⁰ In June 2026, Congress passed another reconciliation bill, the Secure America Act, providing an additional \$70 billion in immigration enforcement funding for ICE, CBP, and the Secretary of DHS.³¹

Chart 1. Reconciliation in Context: Historical ICE and CBP Funding (in billions)³²

[updated chart of reconciliation spending compared to normal, from [pg. 7](#) of *Deputized for Disaster*]

[Caption] The funding Congress provided to immigration agencies in the 2025 and 2026 reconciliation bills is without parallel in our nation's history. In comparison, in the aftermath of the September 11, 2001 attacks that led to the formation of the Department of Homeland Security in 2003, Congress appropriated approximately \$7.68 billion to ICE and CBP³³ — at the time, that amount was considered astronomical, and made them the largest law enforcement agencies in the country.

[Note beneath chart] Fiscal year amounts for FY2003-2025 are total annual discretionary appropriations. This does not include rescissions, offsetting collections, fees, mandatory spending, or trust funds. In FY26, ICE and CBP were funded primarily via continuing resolutions rather than the regular appropriations process, with CBP also receiving funding via P.L. 119-86. Funds provided through OBBBA in July 2025, and through the Secure America Act in June 2026, are available until Sept. 30, 2029. In addition to funds specifically appropriated for CBP and ICE, these reconciliation bills made \$22B and \$5B in funding available, respectively, to the Office of the DHS Secretary for various immigration enforcement purposes. Sources: CRS reports for FY2004 - FY2026, P.L. 119-37, P.L. 119-75, P.L. 119-86, P.L. 119-98, DHS ICE Budget Overview FY2027, DHS CBP Budget Overview FY 2027.

[end chart]

ICE is using this funding to aggressively build out a national deportation policing force — concentrating an unprecedented number of personnel and resources into a single internal security force. ICE hired 12,000 new agents in record time in 2025, based on diminished hiring standards.³⁴ It slashed training standards — from five months to 47 days — and reportedly began placing new recruits into training before they completed the vetting process.³⁵ ICE used recruitment campaigns that employed white supremacist slogans and images, prompting a congressional inquiry.³⁶

The Trump administration diverted more than 25,000 federal law enforcement officers outside of ICE to immigration enforcement.³⁷ An estimated 9,161 FBI personnel were diverted, including at least one in five FBI special agents.³⁸

ICE also used more than \$250 million in reconciliation funding to enlist thousands of state and local police into its deportation force, offering startup funds of \$100,000 — more than the annual budget of some of the

local agencies that have enlisted.³⁹ In a recent report, FWD.us found that local agencies received over \$40,000 per police officer they provided to ICE, and the group estimates that ICE has promised as much as \$2 billion to local agencies.⁴⁰ The administration is enlisting state and local police by leveraging ICE's 287(g) program, named for the section of the Immigration and Nationality Act that authorizes it, in a manner and at a scale Congress never intended, as the ACLU previously documented.⁴¹

Chart 2. Unprecedented Growth in the National Deportation Policing Force

[pie chart of FBI, 287g, ATF, etc. officers]

[Caption]: The Trump administration is cannibalizing resources at every level of government, amassing a national deportation policing force of more than **50,000 agents** — and this force is only growing.

[end chart]

The result is a national deportation policing force of more than 50,000 agents, which is likely to grow even further thanks to unprecedented congressional funding.⁴² In our nation's history, we have never had a single internal security force of this size operating in American communities. Congress has authorized immigration agents to act with expansive legal authorities to interrogate, detain, and arrest people — but no prior administration has attempted to exercise these authorities at the scale we are now witnessing on American streets. The Trump administration has deployed this force in American neighborhoods with no enforcement priorities, no constraints on its operations in or near schools and other sensitive locations, no functioning oversight inside DHS, and a mandate to arrest as many people as possible, wherever possible. Congress has funded this force at a level with no parallel in American history, and failed to fix a broken system of legal accountability that has for years enabled federal agents to violate our constitutional rights with impunity, as further described in this report.

The consequences are already counted in lives: people shot and killed by federal agents in American neighborhoods, U.S. citizens and non-citizens beaten and illegally detained, children tear-gassed and zip-tied, entire communities where people are afraid to leave their homes because they could be stopped and interrogated on the basis of how they look.

FINDINGS

In 2025, communities in the states we reviewed experienced frequent indiscriminate stops and racial profiling often involving use of force.

Reckless Enforcement in American Communities

The Immigration and Nationality Act (INA) constrains immigration officers' ability to engage in generalized, dragnet operations.⁴³ If an agent does not already have a warrant but encounters an individual, the agent must have probable cause to believe that the specific individual is both in the country unlawfully and poses a flight risk to make a warrantless civil arrest.⁴⁴ Under the Trump administration, ICE and CBP have conducted indiscriminate raids by appearing to target locations, rather than particular people.

Agents carried out immigration enforcement actions against people engaged in daily life — turning everyday sites of life into danger zones. In the more than 1,200 incidents we reviewed, agents set up at Home Depots, car washes, taco trucks, and highway corridors — in circumstances that suggest they were looking to see who they could catch, rather than to stake out particular individuals.⁴⁵

We identified **624** instances of enforcement in everyday locations such as but not limited to neighborhood sidewalks and streets, bus stops, gas stations, grocery stores, malls, wildlife reserves, and roads and highways that people take to go about daily life.

Agents carried out enforcement everywhere, including places of employment. Agents targeted these sites because, in their words, undocumented people often worked there.⁴⁶ In addition, agents conducted worksite enforcement, executing warrants to verify employees' work authorization documents or investigate businesses' practices.⁴⁷ Even in these cases, incidents we reviewed included problematic conduct such as excessive use of force and likely racial profiling and collateral arrests.

We documented **252** instances of enforcement at places of work such as car washes, restaurants and food stands, landscaping and construction sites, sites where ride-share drivers wait for calls, outside of home improvement stores where daylaborers seek work, and even at a barbershop; **20** of these incidents we identified as worksite enforcement. For example:

- In New Orleans and nearby communities in Louisiana including LaPlace, Gretna, and Metairie, federal agents targeted day laborers at Home Depot and Lowe's stores.⁴⁸ In one incident, an agent pointed a gun at day laborers as they stood next to their cars in a Home Depot parking lot.⁴⁹
- In Baltimore, agents jumped out of a pickup truck in a Home Dept parking lot and detained five day laborers, tackling and pinning them to the ground.⁵⁰
- In Easton, Maryland, Daniel Fuentes Espinal, a longtime volunteer pastor, was driving to a construction job after buying supplies at Lowe's and picking up breakfast at McDonald's when he was stopped and detained.⁵¹
- At Chicago O'Hare International Airport, ride-share drivers — including, in one sweep, a nursing mother — were blocked in and questioned about their status.⁵²
- In Hampshire, Illinois, truck drivers at a roadside stop had agents knock on their cab doors and ask if they were U.S. citizens; an Uzbek man and a Russian asylum seeker were arrested.⁵³

- In Florida, a man fishing for perch in the Everglades was detained along with his wife, who was nursing their baby in the car.⁵⁴

This trend extended to state and local police who took part in deportation operations through the 287(g) program, through which ICE delegates federal immigration authority to designated state and local police officers. In Florida, we reviewed dozens of instances where traffic stops became deportation traps.⁵⁵ On Interstate 95, police stopped drivers for “good violations” in an area believed to be “saturated with possible illegals.”⁵⁶ Operating under extremely broad discretion created by state laws, state and local police could stop nearly any person for any reason using minor infractions to initiate deportations; in one case, for example, a man working in construction was jaywalking in a town outside Orlando, Florida, leading to his immigration detention.⁵⁷ States can minimize racial profiling under the guise of law enforcement by revising their criminal and traffic codes to remove non-safety offenses commonly used to justify such generalized policing.⁵⁸

In Louisiana, the Department of Wildlife and Fisheries (LDWF) became a feeder for immigration enforcement. LDWF signed an agreement with ICE in May 2025, becoming one of only three state wildlife agencies in the country to do so.⁵⁹ LDWF officers conducted joint patrols with CBP and the U.S. Coast Guard; wildlife officers checked fishing permits while federal agents checked immigration status. One joint operation in November resulted in 10 individuals taken into immigration custody.⁶⁰ In an August patrol at Lake Borgne, officers reported no witnessed crimes or civil violations, yet federal agents detained three people for immigration issues. In another case, after citing a man for littering construction materials near a lake, LDWF forwarded his case to ICE because he had “unverified citizenship.”⁶¹ In yet another case, a 23-year-old Honduran man in the United States under protections from the Ms. L family separation settlement was detained after LDWF officers responded to target shooting in the Maurepas Swamp.⁶²

Against this backdrop of generalized fear of immigration enforcement from any state agency, Walter Francisco Cerrato Cabrera tragically drowned a week before Christmas. When four U.S. Coast Guard agents boarded the oyster vessel he was working on, he jumped into Bayou La Loutre. Another deckhand survived after jumping into the bayou by grabbing onto a tree limb floating by.⁶³

Normalizing the Use of Force and Intimidation

We reviewed **375** incidents in which law enforcement agents used or threatened force, including in immigration arrests or in response to protests across eight states. Law enforcement must use objectively reasonable force in any situation.⁶⁴ Across incidents in which agents used force, they often appeared to use excessive force.⁶⁵ Agents also used intimidation tactics that dehumanized targets and bystanders, further sowing distrust between communities and law enforcement.

We identified situations in which agents pushed, shoved, tackled, and pinned people **418** times. In many cases we reviewed, agents endangered people through excessive use of physical force that could have turned deadly. They pressed their knees and hands on people's backs and necks **52** times, grabbed people by the neck to pin or drag them **19** times, and used chokeholds **10** times — totalling **81** times that agents used tactics so dangerous that many law enforcement agencies sharply restrict or prohibit them because they can cut off breathing and become deadly.⁶⁶ Similarly, ProPublica identified more than 40 instances across the

country in which agents used chokeholds and other tactics that inhibited breathing and blood flow, indicating an alarming trend toward normalizing use of force that can become lethal.⁶⁷

We identified **119** confirmed or reported injuries to individuals following agents' use of force. Of these, **69** were confirmed by medical visits or legal documentation and the other **50** injuries were self-reported.

Ricardo Aguayo Rodriguez, 54, a construction worker and father of two deaf teenagers, was riding his bicycle home from a grocery store in Melrose Park, Illinois, when Border Patrol agents grabbed him in a stranger's driveway, pepper sprayed him, locked an arm around his neck, and struck his head. Video captures him gasping, "Por favor, amigo." While he was hospitalized with head wounds, masked agents barred his U.S. citizen sister from seeing him at the hospital.⁶⁸

We found that agents pulled drivers and passengers from their cars **76** times and smashed vehicle windows **47** times. ProPublica likewise documented nearly 50 cases nationally where agents smashed vehicle windows in 2025.⁶⁹

In Colorado, a father driving away from a courthouse with his partner and 1-month-old was detained after agents boxed in their car. One agent pointed a gun at them as he approached the vehicle, and another smashed the driver's side window while his U.S. citizen partner screamed there was a baby in the car. Glass cut her as she shielded their 1-month-old infant.⁷⁰

Agents used chemical irritants and kinetic impact projectiles to target journalists, protestors, witnesses, observers, elected officials and their staff, clergy, children, and U.S. citizens. We identified situations in which agents deployed chemical irritants such as tear gas and pepper spray **361** times (including **132** times they were aimed directly at individuals), kinetic impact projectiles such as rubber bullets, pepper balls, and other forms of munitions **75** times (including **50** times they were aimed directly at individuals), flash-bang grenades **59** times, and Tasers **33** times.

A cache of Enforcement Action Statistical Analysis and Reporting System (E-STAR) Use of Force Incident Reports for U.S. Customs and Border Protection (CBP), released as part of the *Chicago Headline Club v. Noem* lawsuit shows a disturbing pattern of using this type of force, sometimes euphemistically described as "less-lethal," in Illinois alone.⁷¹ For example:

- In a Home Depot parking lot in Niles, agents used a window-breaking tool to shatter the driver's side window after the driver refused to exit. Agents then directed pepper spray at least three times toward the driver's face, including two bursts from approximately one foot away within about 12 seconds, before pulling him from the vehicle, overpowering him on the ground, and handcuffing him.⁷²
- In Elmhurst, agents attempted to detain a worker entering a trailer containing a lawnmower and tools. After he refused to produce immigration documents or leave the trailer, agents pulled him out, causing him to fall; as multiple agents tried to pin him to the ground and handcuff him, an agent pepper sprayed him in the face from approximately six inches away.⁷³
- Agents questioned a ride-share driver in a lot by Chicago O'Hare International Airport about his immigration status while he sat in a parked car. After he produced an Illinois ID and work

authorization, agents boxed in his car, broke the driver's window, fired a Taser twice (after the first attempt failed) after he allegedly rammed their car, pulled him out, and tased him again after he was out of the car.⁷⁴

- In Cicero, after approaching a man near a gas station, agents chased him for several hundred feet, around a fence, and into an automotive repair business before one agent tased him from about three feet away. He fell to the ground during the five-second cycle and was arrested.⁷⁵

But the casual use of this type of force was reported in other sources, too. In California, a U.S. citizen recording his father's arrest at their workplace was pepper-sprayed, beaten, and arrested.⁷⁶

Agents used their vehicles recklessly to conduct enforcement. Car chases and crashes were a feature, and agents appeared to use their cars as weapons. Agents boxed in individuals' cars **53** times, drove in a way that endangered people or initiated car chases **15** times, rammed vehicles into people's cars **14** times, and hit people with cars **six** times.

For example, in California, a car was rammed on the passenger side by an unmarked vehicle and pinned on the driver's side by a second. A baby in the backseat where the agent's car hit was astonishingly uninjured. Agents emerged with guns drawn, tossed what appeared to be tear gas canisters toward the damaged car, and took away a U.S. citizen reportedly on a warrant related to his participation in recent protests, leaving his traumatized partner and two young children behind.⁷⁷

In Illinois, two men in a pickup truck were pursued for nearly 10 minutes from one town to the next, colliding with at least three other vehicles and losing a tire, before ending up in a high school parking lot where special education students were arriving for class.⁷⁸ Agents chased a man inside, pushing a student aside, before arresting him in a classroom. A Lutheran pastor greeting arriving students was threatened twice with pepper spray for trying to record the event.⁷⁹

Deadly Force

Agents made the threat of deadly force part of ordinary enforcement. We found that agents brandished weapons **130** times and verbally threatened the use of weapons or force **69** times — threatening people in cars, on streets, in homes, at worksites, and in parking lots. For example:

- They tased a U.S. citizen at a gas station in Illinois, a green card holder twice in her front yard in Florida, and a man in a store aisle in New Mexico.⁸⁰
- In Evanston, Illinois, an agent pulling a passenger out of a vehicle barked at protesters and bystanders, "Keep back or I'm going to shoot you," and then pointed a gun at the crowd.⁸¹
- In Hyattsville, Maryland, agents pinned a man in a busy intersection, pressing against his neck, when one dropped his gun. After scrambling to retrieve it, he turned it toward the crowd. A second agent later drew his weapon and moved toward bystanders.⁸²

In Naperville, Illinois, five roofers working on a home were detained by armed, masked agents. "My neighbors witnessed two agents chasing one guy down the street in a residential area, guns drawn," the homeowner, Bobby Fischer, said. "A roofer running for his life."⁸³ **[PULL QUOTE]**

In Bowie, Maryland, agents arrested a father after he had just left home to drive his children to school in the family minivan. His three children — ages 6, 7, and 8 — were in the backseat as masked agents smashed his window, pulled him from the car, pinned him to the ground, pressed a hand on his neck, and pointed a Taser at him while he was pinned. The children later told their mother they saw agents point a gun at their father; video shows an agent pointing the Taser. He was detained one day after his wife said he had checked in for immigration supervision.⁸⁴

Agents lost control of their vehicles during enforcement operations. In the Westlake neighborhood of Los Angeles, agents returned to the Home Depot where they had detained dozens of day laborers earlier that month. Community observers recorded as agents detained two people; a masked agent aimed a handgun at close range; another sprayed a chemical irritant; and an agent jumped into an unmarked SUV as it began rolling forward after agents apparently had forgotten to put it in park.⁸⁵ In Simi Valley, California, agents detained Rodrigo Almendarez, a U.S. citizen born in Canoga Park, outside his job at a roofing and building supply company. Agents left their SUV in drive when they grabbed him; the SUV rolled forward while one agent chased after it, striking a tree and shattering a side mirror.⁸⁶

We reviewed 16 incidents where agents used lethal force. Some of the incidents included:

- In San Bernardino, California, masked agents in unmarked vehicles boxed in Francisco Longoria's truck with his U.S.-citizen 18-year-old son and 23-year-old son-in-law inside. The agents did not identify themselves when asked, shattered the driver's and passenger-side windows, and fired three shots as Longoria drove away, striking the truck. Days later, more than a dozen armed agents came to his home before dawn with an armored personnel carrier, broke the front-door locks, ordered everyone out with their hands up, and pointed rifle lasers at people inside, including a pregnant woman, before arresting Longoria on charges that a judge dismissed the same day.⁸⁷
- In north Phoenix, agents shot at a driver during a 4 a.m. vehicle stop after he began to drive away. DHS said an officer fired twice because he was in the vehicle's path, but the Phoenix New Times reported that photos showed damage to the driver's side window, not the windshield.⁸⁸
- In Ontario, California, Carlos Jimenez, a U.S. citizen and father of three, pulled over near an immigration traffic stop to warn agents that children would soon be gathering for a school bus. An agent pointed a gun at him and pulled out pepper spray before Jimenez tried to leave. As he drove away, an ICE agent fired through the rear passenger window, hitting him in the shoulder.⁸⁹ He was later charged with assault on a federal officer and released on bond; his case remains pending, with his attorneys seeking communications and other discovery they say the government has delayed producing.⁹⁰

On Christmas Eve in Glen Burnie, Maryland, federal agents shot Tiago Alexandre Sousa-Martins after seeing his work van in a Lowe's parking lot, following him to a residential court, boxing him in, smashing his driver's side window, and trying to pull him out. According to an FBI affidavit, Sousa-Martins tried to drive away after agents broke the window; three agents fired their weapons before the van crashed into a tree. He suffered a collapsed lung after being shot in the left thigh and upper right back. DHS initially described the shooting as a defensive response to Sousa-Martins driving at officers and said a second injured man had been a passenger in the van. DHS's account changed after Anne Arundel County police confirmed

reporting that the second man had been arrested earlier in the day, was handcuffed in an ICE vehicle, and was injured separately while in ICE custody.⁹¹

This reckless approach was deadly.

In addition to the well-known cases of Renee Good and Alex Pretti, who were killed by federal immigration agents in Minneapolis in January 2026,⁹² there were at least two other people killed by agents in the eight states covered in 2025.

Silverio Villegas González had just dropped his son at school in Franklin Park, Illinois, when agents cut off his car and shot him at close range. DHS said he tried to drive into them, dragging and seriously injuring an agent. The agent's body camera shows him telling police his injuries were "nothing major." A witness said Villegas reversed when agents blocked him, and did not drive at them.

Three weeks later, also in the Chicago area, a Border Patrol agent shot U.S. citizen Marimar Martinez shortly after sideswiping her car. The administration vilified Martinez, a preschool teacher, as a "domestic terrorist" and prosecuted her. A federal court dismissed the charges against her with prejudice.

In April 2026, Martinez testified before Congress, showing the bullet hole wounds that scar her body. She said:

[BLOCK QUOTE] "I struggle every day with the physical pain and suffering. I cannot close my hand yet to hold a pen. I try to play with the children at times at school and I am in significant pain as I attempt to do things I was so easily able to do before ... The physical scars will always be there ... And perhaps even worse, the mental scars will always be there as a reminder of the time my own government attempted to execute me and when they failed at that to vilify me."⁹³

Flouting Legal Constraints on Use of Force

These incidents suggest ICE and other federal agents flouted constraints on use of force. In 2025, the Supreme Court affirmed the long-standing legal principle that the use of force must be objectively reasonable, which includes not using more force than necessary.⁹⁴ Force must be cautiously and carefully used, and law enforcement must consider the full situation at hand to determine whether or what force might be appropriate.

Federal regulations specify that immigration officers "shall always use the minimum non-deadly force necessary to accomplish the officer's mission and shall escalate to a higher level of non-deadly force only when such higher level of force is warranted by the actions, apparent intentions, and apparent capabilities of the suspect, prisoner, or assailant."⁹⁵ Deadly force is reserved for situations where the officer "has reasonable grounds to believe that such force is necessary to protect the designated immigration officer or other persons from the imminent danger of death or serious physical injury."⁹⁶

Law enforcement should be trained to understand how their movements and actions might escalate a situation and to avoid behavior that puts themselves or others at risk, as DHS' own use of force policy emphasizes.⁹⁷ Because law enforcement carry and can use deadly weapons, it is their responsibility to

develop skills to avoid escalation for the safety of the community.

The use of force should be an absolute last resort when dealing with genuine and imminent threats to safety, and only after all other means have been exhausted. Kinetic impact projectiles should be expressly prohibited for the sole purpose of crowd dispersal; they cannot be used effectively and safely in groups of people. Kinetic impact projectiles should never be fired at close range and should never be targeted at the head or other vital areas of the body, where impact typically causes serious injury and, in some instances, death.

Chemical irritants, when deployed using canisters or grenades, are inherently indiscriminate by nature, cause severe pain and injuries, and frequently escalate tensions. Chemical irritants should not be deployed against protests and peaceful assemblies. When chemical irritants are deployed, extreme caution should be used, including considerations of the presence of bystanders and the existence of areas of egress and airflow to minimize any risk of overexposure due to serious risk of injury.

Intimidation and Ruses

Agents also used intimidation tactics — bullying, harassing, humiliating, and deceiving people — another intentional shift toward tactics that dehumanize targets and bystanders, increasing fear and sowing distrust between law enforcement and communities. We identified **91** incidents involving intimidation. We found that agents bullied, harassed, or insulted people **87** times, and used ruses (impersonated others or used other deceptive tactics to trick people) **26** times.⁹⁸

In effect, law enforcement operated as a national deportation policing force seeking to shape who lives and belongs in the United States.

- Customers at a gas station in Maryland witnessed armed, masked agents in vests marked only “POLICE” emerge from an unmarked black Kia, chase a man named Samuel, and swiftly handcuff him. One agent repeatedly asked him in Spanish, “Why were you running?” then demanded to know whether he was “legal or illegal” and asked for his papers. One witness said, “I felt like I was watching someone being kidnapped.”⁹⁹
- In Arizona, a woman watering her flowers spoke with two men who said they were from Tucson Electric Power and were looking for a resident who wanted a “free estimate.” She watched as they entered her neighbor’s yard. Noticing one had a badge under his shirt and, suspecting they were immigration agents, she ran to warn the neighbor, a Honduran man who had lived in the community for more than a decade, before he let them into his home.¹⁰⁰
- In one incident in Arizona, agents even shut off a water line in an attempt to force a family out of their home.¹⁰¹

In North Palm Beach in Florida, an 18-year-old U.S. citizen pulled over in a traffic stop was told by an officer: “You don’t have any rights here. You are a ‘Migo,’ brother.”¹⁰² He was taken into custody despite his mother, who was also a passenger, reportedly telling officers that he was a U.S. citizen and showing them a picture of his Social Security card.¹⁰³ Florida High Way Patrol and Border Patrol agents had stopped a van with him, his mother, and two other workers, one of whom was tased and each put in a chokehold.¹⁰⁴

Agents at Schools, Shelters, Hospitals, and Other Sensitive Locations

In January 2025, the Trump administration rescinded agency guidance that had limited immigration enforcement at or near schools, hospitals, places of worship, and other “sensitive locations,” as well as the Biden administration's guidance limiting arrests at or near courthouses. ICE then issued an interim guidance on courthouse arrests widely permitting ICE to conduct them. Since then, there have been numerous reports of sightings of federal agents at and in the vicinity of schools, hospitals, places of worship, and shelters, and courts.

We identified **86** incidents that occurred at or in the vicinity of what prior administrations described as protected areas or sensitive locations. **Forty-nine** incidents occurred on, adjacent to, or in the vicinity of school grounds, such as pre-schools, K-12 schools, and postsecondary institutions. Some incidents occurred adjacent to or in the vicinity of multiple schools, affecting **54** total schools. Additionally, we documented **40** times that schools went on full or soft lockdowns due to enforcement. These include instances where there were no active threats on or near school grounds, but schools acted out of an abundance of caution due to enforcement in nearby areas. We also identified **11** incidents that occurred at child gathering spaces, such as playgrounds and school bus stops.

In Colorado, federal raids forced five buses to reroute and prompted the Denver Public Schools superintendent to stop at the scene himself.¹⁰⁵ An armored vehicle was deployed just north of Hinkley High School in Aurora, and a high school classroom looked out onto a staging area in a parking lot.¹⁰⁶ Attendance dipped in Aurora and Denver Public Schools when immigration officials were rumored to begin raids.¹⁰⁷

Superintendent Alex Marrero said that when he visited schools in a suit and tie, he heard students whisper in Spanish, “Is he one of them?” He understood why: “The way I’m dressed is enough to scare them.”¹⁰⁸

[PULL QUOTE]

Within a period of two weeks in the San Diego area, federal agents made three arrests near elementary schools:

- A father was pulled from his pickup truck and arrested by masked federal agents at an intersection, on his way to Park Dale Lane Elementary School in Encinitas, as his young daughter looked on.¹⁰⁹
- After federal agents arrested a father a block away from Linda Vista Elementary School minutes before dismissal, a school board member said attendance was down the next day.¹¹⁰
- A mother was arrested outside an elementary school as students arrived, her two children in the car with her. The school district confirmed the children were students.¹¹¹

In south Phoenix, ICE detained two people just outside Southwest School’s fence line as children from kindergarten through eighth grade were arriving for the day. After detaining the student’s guardian, an agent escorted the child to the school entrance while ICE vehicles were parked just off school grounds.¹¹²

We identified **nine** incidents that occurred at medical facilities, and **eight** incidents that occurred at or in

the vicinity of homeless or domestic violence shelters, social service centers, or an assisted living facility. These include:

- On the first day of Domestic Violence Awareness Month, federal agents in New Mexico waited in the parking lot of a domestic violence shelter and arrested a mother who was handing off her daughter to her abusive ex-partner.¹¹³ Lawmakers in California and New Mexico also described receiving reports of enforcement actions at domestic violence shelters.¹¹⁴
- Six people were detained outside two homeless shelters in the Chicago area.¹¹⁵
- A woman was detained at the county's flagship National Institutes of Health Clinical Center in Bethesda, Maryland, after the hospital's own security called immigration authorities.¹¹⁶
- A visibly pregnant U.S. citizen and her undocumented mother were arrested outside a health clinic in Los Angeles.¹¹⁷
- An undocumented immigrant was detained outside St. Joseph's Hospital in Tucson, Arizona. CBP detained him after he had gone there to care for a family member.¹¹⁸

In California, the presence of frequently masked, armed agents in hospitals and policies surrounding their presence created fear and confusion among patients, family, and staff.¹¹⁹ After immigration agents grabbed Julio César Peña from his front yard in Glendale, he suffered a mini stroke and was hospitalized. He was shackled to the hospital bed by his hand and foot, and agents in the room listened to his calls. When his wife asked what hospital he was at, he said he could not tell her. His attorney could not get an answer either.¹²⁰

Some hospitals began registering detained patients under pseudonyms and prohibiting staff from contacting family members.¹²¹ At White Memorial, doctors reported seeing two to three detained patients per shift.¹²² Milagro Solis Portillo was taken from Glendale Memorial Hospital by plainclothes agents despite advocates' reporting that her medical team said she was not fit for discharge.¹²³ Bayron Rovidio Marin spent 37 days at Harbor-UCLA Medical Center with armed guards posted outside his room around the clock. Agents questioned him while he was in pain and medicated; they would not let his family visit; they took his phone and denied him phone access; and they never processed him or gave him a case number. A federal judge had to order him released, finding that the government had not shown why agents arrested him or kept him there.¹²⁴

We identified **eight** incidents in which agents conducted enforcement operations at or in the vicinity of places of worship, and **five** incidents that occurred at sites and ceremonies for celebration, such as parades and vigils.

- In Maryland, an agent sitting outside a church, waiting for the target of his operation to leave his house, acknowledged that they could never have conducted such an operation before.¹²⁵
- When the pastors of Downey Memorial Christian Church in California approached masked agents arresting a man in their parking lot, the agents refused to identify themselves. When Reverend Tanya Lopez shouted instructions in Spanish to the man being detained, an agent pointed a rifle at her and told her to get back.

We documented **171** incidents of immigration enforcement at immigration courts, state and local courthouses, and immigration check-ins, with some incidents involving arrests of multiple people. Our count is a small fraction of the thousands of noncitizens who were dutifully attending their once-routine

check-ins with ICE or their proceedings in immigration court, when ICE moved to seek their immediate removal.¹²⁶ The ACLU, NYCLU, and partners sued over the administration's unprecedented practice of targeting noncitizens at their immigration court proceedings.¹²⁷

A father leaving a Denver immigration courtroom was grabbed by masked agents and slammed into a counter.¹²⁸ His partner, pleading with agents to let him go, was grabbed by the hair and pushed to the ground, while their crying son watched and a legal observer was pushed against a wall and arrested.¹²⁹ An evangelical pastor and construction business owner, and father of five U.S.-citizen children, was detained at a routine ICE check-in in Florida despite a stay of removal and years of regular reporting. He was deported to Guatemala weeks later.¹³⁰

Targeting Children and Families

Agents arrested children, conducted enforcement in front of children, and detained children alongside adults. They chose to conduct enforcement in places children were present — at school pick-ups and drop-offs, during traffic stops, in courthouses — even when they did not need to. This disrupted schools and instilled terror in children, leading many children to fear leaving their homes or going to school — even in the company of their parents — and to fear any adults they suspected might be disguised law enforcement agents.¹³¹

Enforcement against children, and unnecessary enforcement in places where children are present, is a re-norming of what is acceptable — just like the casual use of force is re-norming the use of force in encounters with immigration agents.

In early October in Chicago, children were playing during recess at Funston Elementary when a few blocks away, masked agents threw tear gas into the street from an unmarked SUV. As parents rushed to the school to make sure their children were okay, nannies moved children at nearby Luna y Cielo Play Cafe into the back of the café. One nanny, afraid she might be taken by federal agents, asked that the children under her care be returned safely to their parents. [PULL QUOTE] A parent later overheard her six-year-old whispering to her dolls, “We have to be good or ICE will get us.” Her mother summed up the harm: “These kids are traumatized. Even if ICE stops doing what they're doing right now, people are going to be traumatized. The damage is already done.”¹³²

We identified **157** incidents where children were present or targeted. This includes incidents where agents stopped or detained children themselves or where children were present during enforcement actions against others, such as at or near schools, traffic stops, raids of homes, and court appearances and check-ins. This also includes incidents in which children were harmed as a result of agents' use of force or tear gas, sometimes when they were merely bystanders. Of these, **54** incidents involved agents directly interrogating or detaining children. We identified **214** children who were detained, were targeted for enforcement, or experienced law enforcement misconduct. This includes **32** U.S. citizen children. We also identified **11** incidents that occurred at child gathering spaces, such as playgrounds and school bus stops.

In Denham Springs, Louisiana, more than a dozen schoolchildren were lined up waiting for the school bus at Plantation Oaks Trailer Park when masked Border Patrol agents in multiple cars sped along the highway

in front of their neighborhood with sirens blaring. Agents were pursuing an air-conditioning work truck. Terrified and crying, children ran when they saw a man pulled from his truck and slammed face-first into the ground. A witness reported that around eight of the schoolchildren actually made it onto the school bus.¹³³

U.S. citizen children were targeted alongside noncitizen children. Diego Rosales, a 15-year-old U.S. citizen waiting, backpack in hand, for his school bus in Illinois was chased for three blocks before agents tackled him to the pavement and asked where he was born.¹³⁴ A 17-year-old U.S. citizen driving a friend home in California was ordered out of his car at gunpoint by an off-duty agent and interrogated before his mother arrived with his U.S. passport.¹³⁵

Students were subject to enforcement and lived with its effects. In New Mexico, 10 Las Cruces high school students on their way to a swim meet were confronted by a Border Patrol agent who, after the Spanish-speaking driver could not answer the agent's questions in English, boarded the bus and demanded students' papers in Spanish, over their coaches' objections.¹³⁶ Although the incident occurred at a permanent interior Border Patrol checkpoint where agents may briefly board buses to ask limited questions, the agent's aggressive use of that limited authority left students visibly shaken.¹³⁷

[PULL QUOTE] "Without hesitation he jumped on the bus and didn't ask the adults any more questions. He just started walking in the bus and started yelling in Spanish, demanding documentation from all the passengers," Las Cruces High Swim coach Pamela Quiñones.¹³⁸

In Florida, a high school senior who had lived in Key West since childhood and recently graduated from the local fire academy was detained on his way to school by CBP agents and deported to Honduras within days. He and his mother reportedly were TPS holders until Honduras's TPS designation was terminated on Sept. 8, 2025.¹³⁹

Children were caught up in operations targeting their parents. In New Mexico, a father was en route to a school event when his vehicle was surrounded by agents in a supermarket parking lot, who smashed his window with a sledgehammer. His partner and two young girls slipped out the passenger side as an armed agent hovered beside the car. ICE, which was assisted by the San Juan County Sheriff's Office, claimed that when officers first tried to stop Jorge Martín Ortiz-Rosalez's vehicle earlier that day, he fled at high speed.¹⁴⁰

In Colorado, a father driving his 12-year-old daughter and 15-year-old son to school was pulled over and all three were detained, even after agents realized he was not the person they wanted. After several weeks in a Texas detention center, the father and two children accepted voluntary departure to Colombia, despite their active asylum case. They were removed roughly six weeks after their traffic stop. Before their removal, the mother told the Durango City Council that her 12-year-old daughter reported being inappropriately touched by an agent.¹⁴¹

Federal agents raided homes, terrifying families. For example:

- In Coral Springs, Florida, an armed agent was recorded at a neighborhood playground while heavily

armed agents, some carrying shields, raided a home down the street.¹⁴²

- In Huntington Park, California, federal agents set off an explosive device outside Jenny Ramirez’s home, blowing off the front door and shattering a window while she and her 1-year-old and 6-year-old children were inside. Ramirez said agents gave no warning, that everyone who lived in the home was a U.S. citizen, and that she told them: “You guys didn’t have to do this, you scared my son, my baby.”¹⁴³
- In Oceanside, California, the Robles Ortega family was woken up by armed agents breaking their windows, deploying flashbangs, and sending a drone inside. Both parents were detained and the 17-year-old U.S. citizen son and 14-year-old daughter were taken out in handcuffs and only released after neighbors intervened in the driveway to remind agents they were minors and verify their citizenship.¹⁴⁴

No One Was Off Limits

In the pursuit of meeting arrest quotas, agents arrested and detained people with serious vulnerabilities and protection needs, as well as people who were citizens or had legal status.

We identified that the following people were detained, were targeted for enforcement, or experienced law enforcement misconduct: **39** people with disabilities or medical needs, **24** elderly people, **19** pregnant or nursing people, **19** people who serve as caretakers for individuals with disabilities or other medical needs, **15** unhoused people, and **three** veterans.

A green card holder who has schizophrenia was stopped on the street in Chicago, zip-tied, and bundled into a red minivan on his way to the grocery store.¹⁴⁵ His family only learned he had been detained from a Facebook video. They searched for him for 10 days — worried because he did not have his medication — but no agency could tell them where he was.¹⁴⁶

A man who was fluent only in Mam, and for whom no court interpretation was available that day, was arrested outside a San Francisco immigration courtroom only moments after the judge said he appeared to have mental competency issues beyond a language barrier. The judge had continued the man’s case to allow him time to find a lawyer and other necessary supports.¹⁴⁷

In Oakland, California, agents arrested Hector, a 21-year-old Indigenous Guatemalan man who is hard of hearing and has Down syndrome. He does not understand English, knows limited Spanish, and struggles to speak K’iche’ after surgeries for a cleft palate and cleft lip. Agents raided the apartment where he lived and collaterally arrested him, even though he was not connected to the people they were targeting. Hector had come to the United States as an unaccompanied child and worked at a local restaurant. “My heart hurts,” he told an attorney after his arrest.¹⁴⁸

We also reviewed cases of federal agents detaining new parents caring for infants. For example:

- An asylum seeker and U-Visa applicant was arrested as she and her family loaded into their car in Cicero, Illinois, for the daily drive to see her days-old premature newborn in the NICU.¹⁴⁹
- In Louisiana, ICE detained two mothers during routine check-ins and deported them within days to

Honduras with their children. Three of the children — ages 2, 4, and 7 — were U.S. citizens. One mother was pregnant, and one child had a rare form of cancer; ICE deported the child without medication or a chance for doctors to advise on care.¹⁵⁰

- In Florida, a mother was deported to Cuba two days after ICE detained her during a check-in appointment that had been moved up, separating her from her 1-year-old U.S.-citizen daughter, who was with her at the check-in and still nursing. Her husband reported that the separation was so sudden and traumatic that the baby was taken to the hospital.¹⁵¹
- At a Baltimore immigration check-in, the mother of a 7-year-old son and a 2-year-old U.S.-citizen daughter was ordered to leave the country within 60 days and told that if she did not self-deport, she would be forcibly deported without her children.¹⁵²

After a Guatemalan woman gave birth at Tucson Medical Center in Arizona while in Border Patrol custody, she was told she faced immediate deportation and would have to decide whether to take her U.S.-citizen newborn daughter with her. Agents stationed at the hospital refused to let her attorney access her so that she could sign a G-28 form, which would indicate he was representing her. After public pressure and intervention from local officials and counsel, the mother and baby were released into the care of a nonprofit in Phoenix.¹⁵³

Immigrants with humanitarian protection needs were not spared from enforcement. We identified that the following people were detained, were targeted for enforcement, or experienced law enforcement misconduct: **117** asylees or people seeking asylum, **nine** survivors of abuse, crime, or trafficking seeking humanitarian protections, **seven** Temporary Protected Status holders or applicants, **six** people who held humanitarian parole, and **two** people with Special Immigrant Juvenile Status. For example:

- In Louisiana, federal agents detained a 22-year-old with Special Immigrant Juvenile Status, which is granted to certain young people who suffered abuse, neglect, or abandonment. This individual, who also had a grant of deferred action, was arrested when he arrived at work. They dismissed his work authorization and deferred action as proof of lawful status. He was stripped of deferred action and denied a bond hearing.¹⁵⁴
- A Venezuelan asylum seeker in Arizona, who had arrived through CBP One and held humanitarian parole, was detained while waiting in a Walmart parking lot for a delivery order after federal agents knocked on his car window. He showed agents a valid work permit and driver's license, but they detained him anyway.¹⁵⁵

US Citizens and Long-standing Residents

Agents also targeted individuals with U.S. citizenship and legal status, as well as individuals who have lived, worked, and built families in the United States for 15+ years. We identified that the following people were detained, were targeted for enforcement, or experienced law enforcement misconduct: **155** U.S. citizens (including **18** Indigenous people), **30** legal permanent residents or green card applicants, **10** DACA recipients, **84** members of mixed-status families, and **81** longtime residents. For example:

- In Louisiana, Paola Clouatre, the mother of a 4-year-old boy and 3-month-old daughter and wife of a service-disabled U.S. Marine Corps veteran, Adrian, was detained at a USCIS interview to start her green card process after an officer told the couple the interview went well. After 20

minutes, three ICE agents showed up and arrested Paola, who gave Adrian her wedding ring to hold. She was detained for two months, during which Adrian drove four hours twice a week to visit her, bringing his daughter as often as he could so that she could continue nursing. Paola's mother had brought her to the U.S. as a teen and sought asylum, but Paolo grew up living in homeless shelters after the two became estranged.¹⁵⁶

- In west Phoenix, Flor Ivet Vargas-Loya, a DACA recipient and mother of two U.S.-citizen children, was detained on Christmas Eve while shopping for her family. She had been released on bond earlier that year, was wearing an ankle monitor, and was waiting on a delayed DACA renewal.¹⁵⁷

In Yuma, Arizona, Border Patrol agents detained Jose Valdovinos, a 27-year-old DACA recipient and longtime resident, after he and his wife left a Circle K gas station near downtown. When his wife asked why they had been stopped, an agent told them, "We don't have to give it to you." Valdovinos had a work permit and, according to his family, no criminal record. DHS later said DACA "does not confer any form of legal status." Weeks later, he was released from the Florence Service Processing Center with an ankle monitor.¹⁵⁸

Trans Immigrants

Though transgender people make up a small number of those detained by immigration enforcement agents, they are among the most vulnerable, as they are at high risk of physical and sexual abuse once in ICE's custody and are denied lifesaving gender-affirming care.¹⁵⁹ We identified **two** transgender immigrants who were targeted for enforcement. In Maryland, ICE agents arrested April Amaya-Luis, a transgender woman married to a U.S. citizen, after she appeared for a routine probation check-in, then transferred her to an all-male detention facility in Miami even though her lawyers said they had provided a passport listing her name as April Amaya-Luis and her gender as female.¹⁶⁰ In New Orleans, ICE called Arely Westley, a trans-Latina immigrant advocate, into the field office after telling her they wanted to offer her less restrictive monitoring in recognition of her community leadership. She was detained when she arrived at her check-in.¹⁶¹ She had received the Robert & Ethel Kennedy Human Rights Center annual human rights award in 2024 and was in the process of obtaining a visa for trafficking survivors.¹⁶²

[SIDE	BAR]
Eleven days before Christmas, 22-year-old Dulce Consuelo Díaz Morales was doing laundry with her father, Manuel Madrigal, and her 17-year-old sister, Shirley Elvirita, when she and her sister decided to get some Taco Bell. She and her sister had just left Taco Bell and gotten back on the road when agents in unmarked vehicles pulled them over. Agents detained Díaz Morales even as her Elvirita shouted, "She was born here! She was born here." ¹⁶³ Her sister said she offered their identification. No explanation was given for why Díaz Morales, who was born in Laurel, Maryland, was taken away but not Elvirita. ¹⁶⁴	
In the days that followed, her legal team did what should never be necessary for a U.S. citizen: they submitted government-created records proving Díaz Morales's U.S. birth to the very government that had arrested her. They even submitted an expert report from Johns Hopkins University authenticating documents. ¹⁶⁵ A federal judge barred ICE from deporting her while the court considered a habeas petition seeking her release from detention. ¹⁶⁶	

Yet, DHS continued to insist she was a Mexican citizen who had entered the country unlawfully in Arizona in 2023.¹⁶⁷ Her family had moved to Mexico years earlier, and she had returned to the United States quickly, fearing for her life because of cartel violence and lacking documentation of her U.S. citizenship when she re-entered. She was processed as a noncitizen and placed into removal proceedings.¹⁶⁸

Díaz Morales's 5-year-old son spent Christmas without his mother. Her father said his grandson stopped eating when she was first detained and cried every day after.¹⁶⁹ During 25 days in ICE custody, ICE transferred Díaz Morales five times between facilities in Maryland, Louisiana, Texas, and New Jersey, and was able to speak to counsel only twice.¹⁷⁰

She was finally released in early January 2026 under ICE "supervision," with an ankle monitor and an active deportation case — even though ICE has no lawful authority over a U.S. citizen.¹⁷¹ ICE closed her case in May 2026, only after Díaz Morales had obtained a U.S. passport.¹⁷² Even then, it did so "without prejudice," preserving the power to reopen removal proceedings against her at any time despite evidence of her citizenship.¹⁷³ **PULL QUOTE** As her attorneys warned, Díaz Morales's case sends a chilling signal: "You are only legal until the government says otherwise."¹⁷⁴

Targeting Community Observers, Protesters, Journalists, and Bystanders as Threats

Across the country, in the course of escalating immigration enforcement actions and in response to protests, federal agents flouted the First Amendment and targeted people who were watching, documenting, protesting, or otherwise bearing witness.¹⁷⁵ This suppression of free speech and dissent is a key part of the authoritarian playbook. Targeting people's speech, political expression, and other activities protected under the First Amendment has a chilling effect, silencing critics and deterring people from exercising their rights. The ACLU and our partners documented numerous accounts of these abusive federal law enforcement actions in litigation.¹⁷⁶ Bystanders who were simply nearby were also swept up in enforcement activity.

We found **150** incidents involving populations who were engaging in activities protected by the First Amendment, such as protesting, filming, photographing, following, or observing the activities of law enforcement. Of these:

- **80** incidents involved community or legal observers or other witnesses
- **71** incidents involved protestors, who experienced misconduct individually or as part of groups
- **24** incidents involved journalists
- **23** incidents involved elected officials or their staff
- **7** incidents involved clergy

Members of these groups are often U.S. citizens. In retaliation for observing or documenting law enforcement activity, agents often used force against or arrested individuals, or threatened them with force or arrest. Additionally, we identified **31** times that agents filmed people or took their photographs because they were observing or documenting agents.

We identified **782** total people who were detained, were targeted for enforcement, or experienced law enforcement misconduct: **568** protestors (individually or as part of groups, when the size of groups was reported), **118** community or legal observers or other witnesses, **53** journalists, **31** elected officials or their staff, and **12** clergy. **51 additional groups** of protestors also experienced misconduct, such as use of tear

gas or rubber bullets for crowd dispersal, but the size of these groups was not reported.

In Hawthorne, California, Cary Lopez Alvarado, a U.S. citizen who was nine months pregnant, was waiting to deliver lunch to her husband and cousin at work when masked agents surrounded their truck. She recorded the agents and told them they were on private property. When she called 911, one agent asked her, “Do you want to get killed?” An agent shoved her into the side of the truck before other agents handcuffed her, pressed her stomach against the vehicle, and later kept her in chains while repeatedly questioning where she was born even though she provided her Social Security number and ID. [PULL QUOTE] One agent asked, “You’re pregnant and you’re doing all this shit?” Another said, “You shouldn’t be doing all that when you’re pregnant. Are you stupid or something?” She spent the night after her release in the hospital with sharp abdominal pain and loss of feeling in her extremities. She gave birth four days before her due date, without her husband, who remained detained. She recalled at that time, “I wasn’t resisting at all. I can’t fight back; I’m pregnant.”¹⁷⁷

Examples included:

- In Louisiana, agents took photos of a woman observing them from her car and threatened to arrest her next time, and other agents threatened an observer at gunpoint for recording them.¹⁷⁸
- In California, a plainclothes agent jumped out of an unmarked car at an intersection and pointed his gun at a witness taking a photo of his license plate.¹⁷⁹

The witness recalled, “I thought it was going to be my last day on Earth. I really thought that was going to be my last moments.”¹⁸⁰ [PULL QUOTE]

- At another intersection in California, a plainclothes agent pulled his weapon on a woman following and recording him — until a local police officer driving by intervened, explaining to the federal agent that there was no crime being committed.¹⁸¹
- In Rolling Meadows, Illinois, an agent driving by pointed a pepper-ball gun at a person filming him.¹⁸²
- In Berwyn, Illinois, an agent walked toward a pregnant driver with his gun raised after she honked to warn others that immigration agents were nearby. The woman said agents had been chasing two people when she began honking; DHS later called her conduct “threatening and aggressive” and said she had been “impeding” agents’ pursuit.

She asked them, “You’re really gonna shoot a pregnant woman?”¹⁸³ [PULL QUOTE]

Elected officials were subject to the same intimidation. In Colorado, after Routt County Commissioner Angelica Salinas recorded agents from her vehicle stopping people and patrolling mobile home parks, she reported that she was followed and boxed in at a nearby post office. Agents left when they saw her husband.¹⁸⁴ In Maryland, Montgomery County Councilmember Kristin Mink filmed federal agents detaining a person behind a Prince George’s County store; as she recorded, an agent grabbed her arm and ordered her to leave.¹⁸⁵

In California, agents beat, pepper-sprayed, and arrested a U.S. citizen recording his father’s arrest at their workplace.¹⁸⁶ In Chicago, agents grabbed a protester on a public sidewalk by the throat and body-slammed him to the ground. The agent’s weapon dangled behind his back, creating a new public safety danger.¹⁸⁷

The Colorado Bureau of Investigation opened a criminal investigation into a CBP officer after he grabbed a protester by the hair, put her in a chokehold, and threw her down a grassy embankment outside an ICE facility.¹⁸⁸ In April 2026, state prosecutors filed third-degree assault and criminal mischief charges against the officer.¹⁸⁹ At the Broadview detention center in Illinois, a masked agent put a protester in a chokehold and had to be pulled off by another agent.¹⁹⁰ The woman was sprayed in the face with a chemical irritant, shot with projectiles, and violently pushed and shoved to the ground before the chokehold.¹⁹¹

In Broadview, Illinois, federal officers allegedly used force against photojournalists who were documenting protest activity from public streets. Dave Decker, a photojournalist visibly wearing press credentials, described agents about 20 feet away on the other side of a fence aiming weapons toward him and a photographer, Leigh Kunkel, as they were partially shielded by a van; he heard popping noises and was struck in the arm and back. Kunkel was also injured. He also photographed an agent pointing a long gun at his camera. The next day, as he recorded officers pushing people to the ground and laughing, an agent fired a pepper ball toward his face from about 30 feet away and hit his camera. He was later shot in the legs at close range after an agent said, “Get him.” Decker, who had covered hundreds of protests, said he had never seen law enforcement hostility like what he witnessed at Broadview. Although he planned to continue covering protests, he feared for his safety.¹⁹²

Agents used their vehicles as weapons against people in the street who were watching or recording their actions. In Oxnard, California, agents rammed the pickup truck of a community observer, Leonardo Espartaco Martinez, who was monitoring immigration activity; he was handcuffed, taken to a hospital with headache and neck pain, and released from detention later that day.¹⁹³ In Chicago, an agent drove his unmarked vehicle into a protester, yelling, “I’m gonna slam you on the f***** ground.”¹⁹⁴ In San Francisco, agents drove through protestors with one protestor still holding on to the car, flinging that protestor into the street and nearly running them over.¹⁹⁵

Taking photographs and video of things that are plainly visible in public spaces is a constitutional right — and that includes police and other government officials carrying out their duties.¹⁹⁶ Specifically, the First Amendment protects the right to photograph and video police conduct occurring in public both because it protects the right to gather information about what public officials do on public property, and because it protects the right to record such matters.¹⁹⁷ This includes the right to livestream such content.¹⁹⁸ Courts have also held that the First Amendment specifically protects identifying officers. For example, the Eleventh Circuit has held that the First Amendment protects recording police officers, their name badges, and license plates on their vehicles, and saying an officer’s name out loud on video.¹⁹⁹

Racial Profiling As An Operating Practice

We identified **437** incidents that likely involved racial profiling, a number that corroborates patterns documented in ACLU and partner litigation, as well as documentation by agents themselves.

Racial profiling occurs when law enforcement uses a person's actual or perceived race, ethnicity, or national origin to decide whom to stop, search, or investigate. Indiscriminate enforcement relies heavily on racial profiling, in violation of the Constitution, federal, and sometimes state law. Such enforcement is also enabled by expansive state criminal and traffic codes that grant law enforcement the power to stop nearly

any person for any reason.

Racial profiling did not occur on an incidental basis at the margins, but it was core to how dragnet immigration enforcement functioned. In practice, community members were approached or pulled aside by federal agents and made to answer questions about who they were and where they were from, with agents apparently having no prior information or a warrant. They made arrests without making any determination of whether a person poses a risk of flight before a warrant can be obtained, as numerous cases documented in ACLU and partner litigation show.

Agents used racialized occupation profiles — identifying work such as day labor, cash-paid construction, landscaping, painting, and other low-wage manual labor as occupations where immigrants would work — to target locations and individuals for immigration enforcement. U.S. citizens, including Indigenous people, were among those stopped based on appearance, language, or location alone.

Agents' own use-of-force reports confirmed the pattern. In Cicero, Illinois, agents described being “assigned to conduct roving patrols” and to “engage the employees / day laborers in conversation to determine their citizenship.”²⁰⁰ Another report explained how agents targeted occupations to identify immigrants for enforcement:

“I know from my experience as a Border Patrol Agent and current intelligence briefings during Operation Midway Blitz that it is common for people illegally present in the United States to work cash paying day labor jobs. These jobs include examples of rideshare/taxi service drivers, basic construction, landscape work, gardening, painting, general haulers and junk haulers, and many other jobs like those occupations. These people seek these cash paying jobs to avoid paying taxes and work under the table because they are not legally permitted to work and this helps them avoid the law.”²⁰¹

In Glenview, Illinois, a Border Patrol agent reported that a man exited his vehicle in a Home Depot parking lot at 7:30 am and “looked around in a paranoid and alert manner,” which he described as “common for illegal aliens who are unlawfully present.” On that basis, agents ran the vehicle’s plate, approached him by name, chased him when he fled yelling for help, and pepper sprayed him twice toward his face, including once from about a foot away, for allegedly resisting by keeping his hands under his body as he lay face down after being taken to the ground.²⁰²

In Skokie, Illinois, a homeowner who voted for President Trump watched agents target two workers on his property. “I mean, two workers, American citizens, working on my lawn, for them to stop and profile them and ask them for papers, there's no constitutional right for them to do that,” he said.²⁰³

A 23-year-old woman was chased by masked agents through her neighborhood outside New Orleans as she walked home from a corner store, even after shouting at them she was a U.S. citizen.²⁰⁴ A Chicagoan walking to the subway, earbuds in and listening to Coldplay, was stopped by half-a-dozen masked agents, handcuffed and pushed against their vehicle, and threatened with a Taser pointed at his ribs if he moved while they asked if he was a U.S. citizen.²⁰⁵ Ernesto Diaz recounts his experience: “I’m Hispanic and I’m dark (skinned), so that’s why they picked me up. It feels scary because I’m wearing a target — you know,

pick me up because I'm this color. It shouldn't be like that."²⁰⁶ Black and brown people bear the brunt of federal immigration agents' increased street presence and racial profiling. Black migrants are being deported at disproportionate rates.²⁰⁷

In Arizona, agents detained a member of the Pascua Yaqui Tribe while walking at night near the San Xavier District of the Tohono O'odham Nation. After an unmarked van followed them for several minutes, they started to run; the van sped up and cut them off. Agents tackled them, said they were under arrest for "suspicious activity," and took them to a facility where they were held for hours without food or water. When they said they were a U.S. citizen and showed a Tribal ID, driver's license, and state ID, agents dismissed the Tribal ID as invalid, said the other IDs "seemed fake," and called them "an illegal." After nearly a day in custody, agents released them. [PULL QUOTE]: The Tribal Nation member chose to be anonymous out of fear for their family's safety: "They told me not to 'get smart' with them, told me I was 'an illegal,' and said they could do anything they wanted to me as long as I was there."²⁰⁸

A CULTURE OF ABUSE AND BROKEN ACCOUNTABILITY

The agents we described in this report were not a few "bad apples" operating in a rogue manner. Their abusive actions directly trace back to orders and demands by senior administration officials to engage in reckless, abusive tactics. The system of accountability — courts, Congress, and public pressure — failed to stop agents who routinely threatened public safety in communities across the country. The severity of conduct we have described suggests a systemic breakdown in professional norms and standards, and exposes major gaps in our accountability structures.

Law enforcement agencies cannot operate above the law or apart from it if we are to have a functioning, democratic system. At a basic level, a professional law enforcement agency should be organized and operated in accordance with clear agency rules and regular processes for evaluating the legality of potential operations, before officers are asked to carry them out. Law enforcement officers should be trained to comply with the law and obligated to report violations of laws and agency policies. An agency's policies and practices should reflect both the law and the reality that breaking the law will carry a consequence — for the officer, and the agency as a whole. When an officer violates a person's rights, an agency should not only risk a loss of public trust — it should face consequences through a system of formal accountability, including the courts, legislatures and other accountability structures.

In contrast, ICE and Border Patrol are operating as though they are not subject to rules and legal constraints. As one former senior DHS official writes:

Operations today increasingly proceed without written policy, careful planning, or substantive legal review. Leadership communicates desired headlines, and officers are expected to lead the news instead of delivering public safety results.²⁰⁹

Former ICE chief of staff Jason Houser warns that ICE's escalation of street arrests was "driven by optics, speed, daily arrest quotas and political pressure rather than judgment," and put agents "in situations that stretch beyond their training, authority and resources." "That is how we arrive at moments like Minnesota

– not as anomalies, but as symptoms,” he argues.²¹⁰

The Trump administration ordered agents to meet unprecedented arrest quotas and removed or reassigned officials over failure to meet them.²¹¹ In the aftermath of the deadly shooting of Renee Good, senior administration officials admonished ICE personnel to view themselves as having “absolute immunity” from legal proceedings.²¹² Senior White House officials repeatedly demonized Good, Alex Pretti and protestors and observers more generally as “domestic terrorists.”²¹³ Border Patrol Chief Greg Bovino urged agents, “arrest as many people that touch you as you want to. Those are the general orders all the way to the top.”

Law Enforcement Masking and Concealing Identity

A culture of evading accountability was reflected in agent masking and related practices to shield identity that made it difficult for people to know whether they were being criminally abducted, and made it impossible for victims and bystanders to know who to hold responsible for abuse. These tactics also undermined community trust in local police, since people could not know whether it was local police or federal law enforcement at a location. We found:

- **372** incidents involved masked agents
- **310** incidents involved agents driving unmarked vehicles
- **255** incidents involved agents wearing vests most prominently labeled POLICE, without other lettering identifying the federal agency, potentially leading the public to misidentify them as local law enforcement. In some cases, these vests did not identify the federal agency, and in others, the federal agency was identified only in small print below the prominent POLICE marking

Broken Accountability Within DHS

In earlier times, the DHS Office for Civil Rights and Civil Liberties (CRCL) — an internal oversight agency within DHS with the authority to investigate ICE and CBP violations — would likely have investigated many of the types of abuses discussed in this report. However, the Trump administration effectively dismantled CRCL in the first few months of the administration, calling the employees “internal adversaries that slowed down operations.”²¹⁴

Congress created CRCL in 2002 through the same bill that created DHS itself.²¹⁵ Congress passed subsequent laws describing the department’s “primary mission” to ensure that “civil rights and civil liberties of persons are not diminished by efforts, activities, and programs aimed at securing the homeland.”²¹⁶ The office processed an estimated 3,000 complaints of abuse every year,²¹⁷ and sometimes took steps to stop problems informally before they worsened. It issued recommendations to ICE and other DHS components to prevent abuses from recurring, identifying needed policy changes and resource improvements. It participated in DHS working groups and boards to develop, revise and influence ICE standards and protocols. While the office’s effectiveness was constrained by limited resources and a lack of authority to enforce recommendations, it “made a difference, especially in urgent individual cases or during crises requiring guidance for reforms.”²¹⁸

In March 2025, without the approval of Congress, the Trump administration put the office’s staff on

administrative leave and ordered staff to immediately stop performing job functions — leaving 550 open complaints that were under investigation.²¹⁹ All but three staff were laid off in May 2025. DHS asserted at the time that it shut down the office, as well as other oversight entities, because by conducting statutorily mandated oversight, they acted as “roadblocks to enforcement,” according to the DHS public affairs assistant secretary.²²⁰

With the dismantling of the Office for Civil Rights and Civil Liberties, there is no longer a mechanism within DHS to systematically review and analyze potential violations of civil rights and civil liberties, including identifying whether there are systemic problems related to the use of force and compliance with applicable laws and policies and recommendations for addressing such systemic problems. Both ICE and CBP have Offices of Professional Responsibility (OPR), but those offices are internal agency offices, not independent oversight agencies.²²¹ The DHS Office of Inspector General (DHS OIG) generally only investigates claims of serious misconduct and criminal behavior,²²² declining to investigate the vast majority of the complaints it receives.

DHS’s handling of the abuses like those described in this report illustrate the general lack of oversight, accountability, transparency, or even concern about potential civil rights and civil liberties violations. DHS repeatedly responded to reports of abuse by vilifying the individuals harmed, rather than committing to an agency investigation. When DHS accounts were contradicted by video, the department doubled down on its statements. While the agency ultimately identified personnel involved in high-profile killings and other shootings, in many cases the agency failed to provide basic information to Congress and the public.

Additionally, there are serious concerns about both the adequacy and independence of the investigations into even these high-profile killings, much less lesser-known uses of force. Months after the fatal killings of Alex Pretti and Renee Good, the status of the federal investigations into the shootings remain unclear.²²³

On June 3, 2026, DHS Secretary Markwayne Mullin stated in a congressional hearing that the FBI was charged with investigating the federal officers.²²⁴ However, state and county officials sued the Trump administration in late March, accusing federal authorities of refusing to cooperate and share information and denying Minnesota investigators access to key information.²²⁵

Secretary Mullin also stated that he was not sure whether the agents who shot the U.S. citizens were still working for DHS.²²⁶ Reports indicate that the ICE agent who shot and killed Renee Good was only placed on three days of administrative leave and subsequently transferred to a different state to continue working with the agency.²²⁷

Broken Accountability in the Courts

Under current law, the people harmed and the families of those killed by federal agents face major barriers to suing and holding those agents accountable for violations of their constitutional rights. A federal law, 42 U.S.C. § 1983, provides a way for individuals whose constitutional rights are violated by state and local agents to sue, but there is no comparable federal law for such violations by federal agents.²²⁸ In 1971, the Supreme Court in *Bivens v. Six Unknown Named Agents of the Federal Bureau of Narcotics* held that the Constitution itself created a right to sue federal government officials for constitutional violations.²²⁹ But over the next few decades, the Supreme Court issued decisions severely limiting *Bivens*. In practice, many

victims of federal misconduct are now unable to sue and hold federal agents accountable for violations of their constitutional rights. Even when plaintiffs can bring claims, qualified immunity frequently prevents them from succeeding. Courts have ruled against plaintiffs and resolved cases in favor of defendants unless there was a prior decision with nearly identical facts, or the case involved a very rare “obvious” violation. In practice, the Supreme Court’s current version of qualified immunity defense is often an insurmountable barrier to victims’ access to justice.

The result is a broken accountability system, enabling some of our nation’s largest law enforcement agencies to disregard constitutional rights and avoid liability and accountability. Victims’ limited ability to sue for damages is compounded by the lack of functioning accountability structures within DHS.

When individuals get away with abuse, it fuels more violations — abusers remain at agencies and are able to continue perpetrating abuse, and may even be emboldened to commit even more serious abuses. Agents who would report abuses they witness have diminished incentives to do so.

Broken Accountability to Congress

Under the second Trump administration, agency personnel outside of ICE and Border Patrol, including the Coast Guard, FBI, U.S. Marshals, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), were seconded to immigration enforcement in unprecedented numbers.²³⁰ These agencies are accountable to different congressional committees and subject to different appropriations laws requirements. The administration’s blurring of multiple agencies into a single, national deportation policing force — particularly with widespread individual masking and use of unmarked cars to conceal law enforcement identity and agency affiliation — undermined Congress’ ability to conduct oversight and may have ramifications for its ability to use appropriations laws to impose constraints on agency actions. When people do not know who stopped them, who arrested them, or who should be held responsible — and the agency refuses to disclose or does not investigate or track that information — it weakens Congress’ ability to respond with legislation to stop further abuse.

The second Trump administration and its allies in Congress have also used the congressional reconciliation process to frustrate standard processes of congressional oversight and accountability. They have secured \$240 billion in funding through the reconciliation process, and they claim it leaves them unfettered by traditional constraints as well as the specific requirements enumerated in annual appropriations bills.²³¹ In 2026, ICE and Border Patrol will be funded singularly by reconciliation funds, due to Congress’ failure to negotiate constraints that would have led to passage of an annual appropriations bill. This could result in ICE and Border Patrol operating in an even more lawless, brazen manner.

A BLUEPRINT FOR AUTHORITARIANISM

The abuses detailed in this report are about more than immigration. They reveal a blueprint for expanding authoritarian rule in the United States, with profound consequences for everyone in America.

The tactics and rhetoric of the Trump administration are straight from the authoritarian playbook, aimed at both suppressing opposition and delegitimizing checks on its power. Modern authoritarians use “salami

tactics,’ slicing away at democracy a sliver at a time,” as Protect Democracy notes.²³² In the mass deportation drive of 2025 and continuing escalations, we have seen numerous examples including:

- Suppressing protest through the use of force, intimidation and retaliation that we document in this report, as well as more than 500 arrests and prosecutions of protestors
- Retaliation, threats and intimidation of those who record their actions or act as observers of immigration proceedings, including issuing fines and citations against observers and using facial scanning and photography against them²³³
- Deploying ICE and other federal law enforcement as an internal security force, in retaliation against cities and states run by officials of the opposing party and even to escalate his pressure on Congress during a funding standoff²³⁴
- Repeated vilification of protestors and people recording ICE’s actions as domestic terrorists²³⁵
- Attacks on officials in the opposition party and others considered political enemies — including arrests, prosecutions, and vilification²³⁶
- Emerging attacks on lawyers and organizations providing legal support to immigrants and protestors — in the form of a directive to investigate “rampant fraud” by immigration lawyers, investigations into particular organizations by federal agencies and Congress, as well as reported threats to target law firms if they take on cases²³⁷
- Questioning the legitimacy of the judiciary when it acts to check abusive practices — with President Trump echoing calls to impeach a federal judge in a major immigration case involving the ACLU,²³⁸ and senior official Stephen Miller going as far as decrying a judge’s decision in another case involving the ACLU as “another act of insurrection against the United States and its sovereign people.”²³⁹

The scale of these attacks is growing, but paradoxically, it is getting harder to track them. Erosion of our basic freedoms that would have made headlines only a few years ago are now so commonplace that it is hard to fully take stock of each event or action. Federal law enforcement presence in our communities has not disappeared in the aftermath of Minneapolis. Horrifying cases of families separated, American children harmed, and people senselessly torn from their communities not only continue — they have become a new normal. This is part of what makes the mass deportation campaign a blueprint for authoritarian rule. In countries experiencing authoritarianism, the loss of basic freedoms grows so widespread that it grows less poignant. It is a fact of life, obscured or ignored, rather than protested.

The administration uses racialized anti-immigrant scapegoating to build power, justify lawless behavior of federal agents and obscure the wide-reaching harm it is inflicting on Americans across many communities. Viewed from a broader lens, its project of mass deportations is not just a direct instrument of power; it is about defining who belongs in the United States. That is underscored by DHS’ explicit aim to deport “100 million” people and its thinly veiled white supremacist rhetoric and imagery.²⁴⁰ The mass deportation push is also among the most visible and visceral parts of the administration’s attempt to roll back progress from the Civil Rights era, which we see from voting rights to reproductive justice, to the dismantling of the civil rights enforcement infrastructure of the federal government.

Resisting authoritarianism, emerging from our democratic backslide, and future-proofing our democracy all require transformative reform of our immigration system to make it less vulnerable to exploitation — that includes dismantling the national deportation policing force, removing legal authorities the government

is using to go after dissent, and creating new, stronger accountability mechanisms.

Above all, our nation must prioritize a path to citizenship for the millions of people in this country who lack legal status or who face de-legalization. Without a path to citizenship for millions, our democracy is just a thin veneer for an unequal system where rights exist only for those who are currently deemed to “belong.” We must avoid a future where a permanent underclass provides the labor upon which the country depends, but is at the perpetual mercy of an internal security force and an authoritarian ruler’s whims. Citizenship is critical to having an equal, free and functioning democracy — where everyone can express their opinions without fear, and those who live, work, and contribute to our nation have an equal voice in how it is governed.

DETAILED RECOMMENDATIONS

The abuses documented in this report, which occurred in 2025, have not stopped in the aftermath of Operation Metro Surge in Minneapolis. Despite increased scrutiny from elected officials and increased public disapproval, agents have continued and even escalated abusive and illegal actions like the ones described in this report. In addition to killing Renee Good and Alex Pretti in Minnesota in January 2026, DHS agents have regularly and frequently engaged in racial profiling,²⁴¹ surveilled and targeted critics,²⁴² and subjected people to violent uses of force,²⁴³ even as they more often operate without the same visibility and staged theatrics as in 2025. The cruelty and abuse by law enforcement agents in our communities could worsen as DHS’ budget balloons with more unrestrained funding.

There are specific measures that policy makers can take to protect the civil rights of their residents and fix gaps in accountability that have allowed abuse to flourish.

Recommendations to State and Local Governments

- To break the cycle of impunity for abuses by the national deportation policing force:
 - Pass legislation to authorize civil lawsuits against federal, state, and local officials who commit federal constitutional violations in your state. Lawmakers enacted such “converse 1983” statutes in Connecticut, Maryland, New York, and Vermont in 2026. Lawmakers also considered legislation in Colorado, Georgia, Massachusetts, Minnesota, Rhode Island, Washington, and Wisconsin.
 - Increase documentation and monitoring of abuse by passing legislation or issuing executive orders to direct state agencies, such as an Attorney General office, state civil or human rights office or Offices of Immigrant Affairs, to establish mechanisms to investigate, document, collect, and make an annual report on harms to residents of the state arising from immigration enforcement.
- To assist impacted community members:
 - Establish a helpline to report civil rights violations and provide information to support impacted individuals. Provide information on social services, counseling and other resources provided by state and local governments to assist victims.
 - Establish or expand funding for legal assistance to residents facing wrongful charges arising from federal law enforcement escalations and immigration enforcement, especially

those in immigration detention. Collaborate with officials across state lines to ensure that their residents get access to counsel if they are transported and held in immigrant detention in another state.

- Expand certification of T and U visas to expedite protections for undocumented people.
- To limit participation in immigration enforcement and civil rights violations, pass legislation, issue Attorney General guidance, and take other measures to:
 - Prohibit state and local law enforcement from making agreements with federal agencies to participate in immigration enforcement, including immigration detention.
 - Prohibit agencies from volunteering resources to federal agents for operations that involve immigration enforcement or would violate First Amendment rights and other civil rights — including volunteering personnel, logistical assistance, data, collaboration in checkpoints, and access to jails.
 - Push ICE and CBP to seek to obtain judicial warrants if they wish to enter sensitive locations — such as public schools, hospitals, libraries, homeless and domestic violence shelters — by directing those entities not to consent to federal law enforcement agencies entering nonpublic areas of these facilities for the purpose of civil immigration enforcement.
 - Prohibit racial profiling and other forms for profiling, and prohibit employees from requesting information about citizenship or immigration status unless otherwise required by law. Take measures to limit collection of data regarding citizenship or immigration status, and establish data retention policies that safeguard privacy.
 - Revise criminal and traffic laws to remove non-safety offenses commonly used to justify racial profiling and pretextual policing.²⁴⁴
 - Revise state laws that delegate generalized state law enforcement authority to federal law enforcement officers.

Recommendations to Congress

- **To reduce abuses and reform our nation's immigration system:**
 - Remove the immigration agencies from the Department of Homeland Security, which is too vast to allow for effective congressional oversight or internal agency accountability.
 - Establish a new cabinet-level Immigration Management Agency oriented toward service — with a mission to keep families together, support American communities and meet the needs of the American workforce.
 - Enact legislation that provides a pathway to citizenship for millions of long-standing residents, who are American in every way but on paper. Replace the threat of violent “enforcement” with fair, dignified, and efficient processing and clear rules to qualify for termination of removal proceedings and legal status, including citizenship.
 - Dismantle the national deportation policing force in light of the extensive record of serious constitutional violations described in this report and ongoing litigation.
 - Repeal provisions of law that the Trump administration has used to divert federal, state, and local law enforcement from their primary missions to serving ICE, including 8 U.S.C. § 1357(g).
 - In light of the danger that a massive internal security force poses to our democracy

and American communities, use appropriations law to prohibit future diversions and concentration of federal law enforcement personnel, equipment, and resources without explicit, advance, and periodic congressional approval. Enact measures such as H.R. 4476/S. 2386 the Preventing Authoritarian Policing Tactics on America's Streets Act, which limits the deployment of federal law enforcement officers unless requested by both the mayor and governor. Repeal authority for programs that divert local law enforcement from local matters to federal immigration enforcement, such as through H.R. 6890 the PROTECT Immigration Act of 2025.

- Dismantle the system of mass immigrant detention, including by repealing authority for mandatory detention and detention of families and children, such as through H.R. 6397/S. 3702 the Dignity for Detained Immigrants Act.
- Short of these transformative measures, take steps to prohibit abuses by federal law enforcement documented in this report, such as:
 - Enact the End Racial and Religious Profiling Act, which would prohibit the use of race, ethnicity, spoken language, and national origin as the basis for stops and arrests across the country as a basis for federal law enforcement action, and require training, data collection, and oversight to ensure compliance.
 - Enact the Right to Record Act, which would allow people to sue federal agents who violate our First Amendment right to record their actions in public.
 - Enact H.R. 7363/S.3779 the ICE Out of Our Faces Act to stop federal agents from using facial recognition technology and other biometric surveillance technologies to track people and chill speech.
 - Enact legislation to codify a strong federal standard for the use of force by federal officers, such as H.R. 6297/S.4278 the PEACE Act.
 - Enact measures such as H.R. 1061 the Protecting Sensitive Locations Act to broadly prohibit civil immigration enforcement arrest operations in community spaces in light of the chaos, fear, and harm to public safety they inspire.
 - Repeal statutory authority for civil immigration arrests that are not based on administrative warrants, and place specific procedural constraints on such arrests going forward, in light of the susceptibility of such authority to abuse and racial profiling.
 - Enact legislation providing special protections for children in light of agents' pattern of arresting children, conducting enforcement in front of them, deploying chemical irritants near schools, and detaining minors alongside adults. Such legislation should prohibit civil immigration enforcement operations at or near schools, prohibit the detention of children in adult facilities, and require that agents assess and document the presence of children before initiating any enforcement action.
 - Codify an improved version of the ICE parental interests directive to ensure that primary caretakers who are arrested or detained by federal immigration agents or their state partners can make arrangements for the care of each of their dependent children and participate in child welfare proceedings.
- **To improve accountability:**

- Rescind reconciliation funding and use subsequent annual appropriations bills to impose limits on agencies, require transparency and reporting, and hold them accountable.
- Pass the Bivens Act to empower individuals to sue federal officers who violate their constitutional rights, and pass the Constitutional Accountability Act to enable victims to hold the employing agency directly accountable, including when agents operate with masks and refuse to identify themselves. Together, these measures would ensure that constitutional rights can be enforced in practice, not just in theory.
- Short of the transformative measures noted above, use appropriations and authorizing laws to rebuild the Department of Homeland Security's Office for Civil Rights and Civil Liberties, providing it greater authority and independence.
- Enact bills to prohibit federal law enforcement from disguising their identity including H.R. 4843 the Combating Law Enforcement Anonymity by Requiring Identification Disclosure (CLEAR ID) Act and S. 2212/H.R. 4667 the Visible Identification Standards for Immigration-Based Law Enforcement (VISIBLE) Act of 2025.

EMBARGOED

DETAILED METHODS

This report examines federal immigration enforcement actions across Arizona, California, Colorado, Florida, Illinois, Louisiana, Maryland, and New Mexico from January through December 2025, with specific attention to civil rights and civil liberties harms. These states represent a cross-section of the country, reflecting varying degrees of federal law enforcement presence and personnel surges. It builds on prior ACLU research and advocacy by reviewing publicly documented enforcement actions and patterns of conduct during the first year of the second Trump administration.

The report draws on desk research across a wide range of sources, including news reports, legal filings, investigative reporting, community organization alerts, public statements, visual evidence, congressional investigations, human rights documentation, and prior ACLU and ACLU affiliate work. DHS press releases and agency statements were used as corroborating evidence, not as the sole basis for characterizing incidents.

Research Review

We conducted desk research from November 2025 through January 2026, searching for documented incidents of enforcement and identifying who was subject to enforcement, where enforcement occurred, and how it was carried out. Our review covered a range of publicly identified federal immigration enforcement activity during the period and was not limited to incidents already alleged to involve civil rights violations or unlawful conduct.

Sources included:

- news coverage from national, regional, and local outlets
- investigative reporting and long-form journalism
- court filings, complaints, declarations, and other legal records
- reports, alerts, and public statements from immigrant rights organizations, rapid response networks, mutual-aid groups, and service providers
- congressional investigations, hearing materials, and other government oversight records
- public statements, press releases, and other materials issued by institutions such as school districts and schools, hospitals, faith institutions, and other similar bodies
- public statements, press releases, and other materials issued by DHS, ICE, CBP, other federal agencies, and state and local law enforcement agencies
- visual evidence, including video and photographs

Incidents were corroborated by one or more additional sources, including formal news coverage, legal filings, official statements, institutional statements, or visual evidence with verifiable details. Incidents documented through rapid response and immigrant organizations, which relied on witness observation and, when available, other types of verification such as speaking with family members or looking up people whose names were known on the ICE detainer system, were treated as reliable; wherever possible, these types of incidents were also corroborated with one or more additional sources. Incidents identified by a single uncorroborated social media source were excluded. This process resulted in a final sample of 1213 incidents.

Incident Coding and Analysis

We reviewed and coded incidents by categories and sub-categories for sorting and analysis (see below). Our coding could capture only as much as was identified by the desk research.

Code List:

Agency Type: ICE/HSI/ERO, CBP/Border Patrol, TSA, FBI, U.S. Marshals, DEA, ATF, IRS, National Guard, Coast Guard, U.S. Postal Service, Florida Highway Patrol, Florida Fish & Wildlife Conservation Commission, Florida Gaming Control Commission, Florida Department of Agriculture, Louisiana Department of Wildlife & Fisheries, state and local police and fire departments, local sheriff's offices

Agency Identification: Masked, Vests marked POLICE, unmarked vehicles, plainclothes

Courthouse: Yes, No

Immigration check-in: Yes, No

Enforcement interaction with children: Yes, No

Incident involves children (Interaction with children OR children present/targeted): Yes, No

Location:

- Everyday locations
 - Outside of home, in driveway, or in neighborhood
 - Street stop or sidewalk
 - Traffic stop
 - Traffic or street stop (arrest occurs in the street, but reporting/documentation leaves it unclear whether individuals were walking or pulled over)
 - Bus stop
 - Grocery store or supermarket
 - Mall or shopping center
 - Gas station
 - Businesses (customers targeted)
 - Beach, lake, or wildlife reserves
- Places of work
 - Car wash
 - Big box hardware store
 - Construction site
 - Worksite
 - Restaurant, food truck or stand (workers targeted)

Sensitive Location:

- Medical facility
- Disaster relief site
- Social service center
- Shelter (homeless, domestic violence)
- School
- Place of worship

- Child gathering space (e.g., playground, school bus stop)
- Site for ceremony or celebration (e.g., vigil, parade)
- Assisted living facility

Populations affected:

- **USC-A** – U.S. citizen adult
- **USC-C** – U.S. citizen child
- **C** – Child (under 21 years old, non-U.S. citizen)
- **I** – Indigenous person
- **CL** – Member of clergy
- **J** – Journalist or citizen-journalist
- **E** – Elected official or staff
- **P** – Protestor
- **L** – Legal or community observer
- **W** – Witness or ordinary person observing
- **PR** – Pregnant or nursing person
- **MED** – Person with disability or medical needs
- **ELD** – Elderly (60+ years old)
- **MIX** – Member of mixed-status family (parent to USC or LPR child/children, or has USC/LPR spouse)
- **CAR** – Caretaker for someone with disability or medical needs
- **SURV** – Survivor of abuse or trafficking
- **TR** – Transgender person
- **LPR** – Legal Permanent Resident (LPR) or applicant for LPR status
- **TPS** – Temporary Protected Status (TPS) holder or applicant
- **ASY** – Asylee or asylum seeker
- **DACA** – Deferred Action for Childhood Arrivals (DACA) recipient
- **PAR** – Humanitarian parolee
- **SIJS** – Special Immigrant Juvenile Status (SIJS) holder
- **LT** – Longtime resident (in U.S. for 15+ years)
- **UH** – Unhoused person

Type of enforcement action:

- **1** In the street
- **2** Enforce civil immigration law
- **3** Criminal enforcement related to drugs, trafficking, employment
- **4** Crowd control that takes place in the vicinity of facility used for immigration detention, processing, or deportation
- **5** Other

Misconduct:

- **P** – Physical force
 - **P-F** – Pushed, shoved, tackled, pinned, beat, punched, grabbed, or kicked person; threw person to ground; pushed person from bike; pulled person's hair; restrained person (by pushing them against surface or grabbing their hands); forced person's legs apart
 - **P-N** – Grabbed person by neck to drag or pin them
 - **P-C** – Used chokehold

- **P-K** – Applied knee or other pressure to person’s neck or back
 - **P-E** – Extracted person from car
- **T** - Threatened force
 - **T-W** – Brandished weapon at person (not carrying a weapon alone); pointed, waved or drew weapon; walked toward person, group, or vehicle with weapon drawn
 - **T-V** – Verbally threatened the use of force or weapons
- **C** – Involving cars
 - **C-B** – Boxed in car
 - **C-C** – Crashed into car
 - **C-BC** – Brake-checked car
 - **C-H** – Hit person with car
 - **C-RD** – Drove recklessly or engaged in car chase
- **W** – Use of non-lethal weapons
 - **W-B** – Used weapons to beat person (e.g., batons)
 - **W-PP** – Using weapons to damage person’s personal property (not including cars)
 - **W-R** – Used kinetic impact projectiles (e.g., rubber bullets)
 - **W-RD** – Aimed kinetic impact projectiles directly at a person
 - **W-SW** – Smashed windows using batons or other instruments
 - **W-T** – Used Taser
 - **W-G** – Used flashbang grenades
- **CI** – Use of chemical irritants
 - **CI** – Used chemical irritants (e.g., pepper spray, pepper balls, tear gas, smoke grenades, or mace)
 - **CI-D** – Chemical irritants shot or sprayed directly at someone
- **IN** – Intimidation
 - **IN-I** – Bullied, harassed, or insulted person
 - **IN-R** – Used ruses, impersonated others, tricked person or lied
- **S** – Surveillance
 - **IN-P** – Knocked phone or camera out of person’s hands
 - **IN-S** – Photographed or filmed person in car or street, or photographed license plates
 - **IN-RE** – Action taken in retaliation against person observing or documenting
- **M-DCA** – Denied a person medical care during arrest

Lethal Force:

- **LF** - Lethal force
 - **LF-N** – Discharge of deadly weapon, no injury or fatality
 - **LF-P** – Discharge of deadly weapon, caused damage to property
 - **LF-IN** – Discharge of deadly weapon, caused injury
 - **LF-F** – Discharge of deadly weapon, caused fatality
 - **LF-C** – Hit person with car

Racial profiling: Likely, Unknown, No

Descriptive analysis was used to identify patterns across states, locations, affected populations, and enforcement tactics. This included analysis of non-custodial arrests, sensitive-location enforcement, use of force, likely racial profiling, and recurring patterns involving children, people seeking protection, U.S. citizens, Indigenous people, people with medical needs or other vulnerabilities, and other populations such as journalists, protesters, observers, witnesses, bystanders, and elected officials.

Research Limitations

According to media reporting, 230,000 deportations took place from the interior of the United States in 2025, while DHS reports 600,000 deportations.²⁴⁵ For this report, given limitations of time and capacity, we could only review a small fraction of the enforcement interactions that underlie this large, disputed number, as well as interactions between federal law enforcement and protestors, observers, and journalists. Thus, our report is not a complete account of all immigration enforcement actions during the period. Media coverage was thinner in non-metro areas, and people affected by enforcement may have been reluctant to come forward because of fear, sense of futility, limited English proficiency, weak access to legal representation, or concern about retaliation. People who were vulnerable and afraid were likely not to report what happened to them.²⁴⁶ Even in incidents that were included, we may not have been able to capture all civil rights issues or other information about the incident given limited or incomplete details available. Just as the sheer volume of enforcement was intended to overwhelm communities and courts, it also obscured the full human harm.

For those reasons, the incidents documented here likely undercount the true scale of use of force, racial profiling, enforcement affecting vulnerable populations, and other civil rights harms. The absence of documentation should not be understood as evidence that such conduct did not occur. Even at this documented floor, however, the same pattern of conduct appeared across states and enforcement contexts.

EMBARGOED

APPENDIX

Table 1.

Table 2.

Table 3.

Table 4.

Table 5.

Table 6.

Table 7.

Table 8.

Table 9.

Table 10.

Table 11.

Table 12.

¹ Jack Lemnus, “Increased immigration enforcement along Treasure Coast this week, Florida data shows,” Treasure Coast Newspapers, Oct. 21, 2025 (updated), <https://www.tcpalm.com/story/news/local/florida/2025/10/21/florida-immigration-ice-arrests-increase-treasure-coast-border-patrol-immigrant-stuart-fort-pierce/86817287007/>; Jack Lemnus, “Why 4 legal residents arrested during ICE, FHP immigration raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007/>.

² Jack Lemnus, “Why 4 legal residents arrested during ICE, FHP immigration raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007/>; Florida Highway Patrol, Arrest Report No. BCI99ARR002597, Oct. 23, 2025 (on file with author); conversation with Jake Lemnus, June 5, 2026.

³ Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007/>; Florida Highway Patrol, Arrest Report No. BCI99ARR002597, Oct. 23, 2025 (on file with authors); video of F.S.G. arrest, Oct. 23, 2025, recorded by Latinos en Stuart provided by journalist (on file with authors); video of F.S.G. arrest, Oct. 23, 2025, recorded by witness and provided by journalist (on file with author); conversation with Jake Lemnus, June 5, 2026.

⁴ Jack Lemnus, “Why 4 legal residents arrested during ICE, FHP immigration raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007>; Florida Highway Patrol, Arrest Report No. BCI99ARR002597, Oct. 23, 2025 (on file with authors); video of F.S.G. arrest, Oct. 23, 2025, recorded by Latinos en Stuart provided by journalist (on file with authors); video of F.S.G. arrest, Oct. 23, 2025, recorded by witness and provided by journalist (on file with authors); conversation with Jake Lemnus, June 5, 2026.

⁵ Jack Lemnus, “Why 4 legal residents arrested during ICE, FHP immigration raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007>; Florida Highway Patrol, Arrest Report No. BCI99ARR002597, Oct. 23, 2025 (on file with authors); conversation with Jake Lemnus, June 5, 2026.

⁶ Jack Lemnus, “Why 4 legal residents arrested during ICE, FHP immigration raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007>; Florida Highway Patrol, Arrest Report No. FHP99ARR819874, Oct. 23, 2025 (on file with authors); conversation with Jake Lemnus, June 5, 2026.

⁷ Jack Lemnus, “Why 4 legal residents arrested during ICE, FHP immigration raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007>; Florida Highway Patrol, Arrest Report No. BCI99ARR002597, Oct. 23, 2025 (on file with authors); conversation with Jake Lemnus, June 5, 2026.

⁸ Our findings build on those of other independent investigations. The U.S. Senate Permanent Subcommittee on Investigations has shone a consistent spotlight on the administration's unlawful and unconstitutional immigration enforcement in public forums and reports documenting extrajudicial detentions of U.S. citizens and excessive and deadly force. Investigative reporting by outlets such as ProPublica, Bellingcat, The Marshall Project, The Intercept, and The Trace, national and state media, and human rights organizations such as Human Rights Watch, also found similar patterns and conduct documented here.

⁹ See Graeme Blair and David Hausman, “One Year of Immigration Enforcement Under the Second Trump Administration,” Deportation Data Project, April 7, 2026, <https://deportationdata.org/analysis/immigration-enforcement-first-year.html>.

¹⁰ Historically, such areas were deemed “sensitive locations.” President Biden’s administration replaced the term “sensitive locations” with “protected areas” to convey that certain places require special consideration because of the essential functions they serve and the people who rely on them. U.S. Customs and Border Protection, “DHS Protected Areas FAQs,” <https://www.cbp.gov/border-security/dhs-protected-areas-faqs>.

¹¹ Erin Stone, “Downey Church Community on Edge After Masked, Armed Officers Detain Man on Church Property,” LAist, June 11, 2025, <https://laist.com/news/politics/downey-church-community-on-edge-after-masked-armed-police-detain-man-on-church-property>; Jesus Jiménez and Emily Baumgaertner Nunn, “Church Leaders Shaken After a Man Was Detained in Their Parking Lot,” <https://www.nytimes.com/2025/06/11/us/la-protests-ice-raids-church-arrest.html>, June 11, 2025.

¹² Ted Hesson, “What Do the Numbers Show About Trump’s Immigration Enforcement Record?,” Reuters, April 22, 2026, <https://www.reuters.com/world/us/trumps-early-immigration-enforcement-record-by-numbers-2026-04-22/>.

¹³ Michael Williams, “Defiant border czar brushes away MAGA critics, says ‘mass deportations are coming,’” CNN, May 5, 2026 (updated), <https://www.cnn.com/2026/05/05/politics/tom-homan-border-security-deportations>.

¹⁴ Rachel Poser, Emily Bazelon, and Matthew Purdy, “The View From Inside Trump’s DHS,” The New York Times, April 18, 2026, <https://www.nytimes.com/interactive/2026/04/14/magazine/trump-dhs-ice-officers-immigration-deportations.html>.

¹⁵ DHS (@DHSgov), X (Dec. 31, 2025), <https://perma.cc/9E62-AFSX>; Ali Breland, “The Trump Administration Is Publishing a Stream of Nazi Propaganda,” The Atlantic, Jan. 21, 2026, <https://www.theatlantic.com/national-security/2026/01/social-media-trump-administration-dhs/685659/>.

¹⁶ Jason Houser, “I Worked for ICE and CBP. Our Current System Makes Everyone Less Safe.,” USA TODAY, Jan. 14, 2026, <https://www.usatoday.com/story/opinion/voices/2026/01/13/ice-minnesota-immigration-enforcement-political-signaling/88146795007/>.

¹⁷ U.S. Immigration and Customs Enforcement, *Annual Report Fiscal Year 2024*, Dec. 19, 2024, <https://www.ice.gov/doclib/eoy/iceAnnualReportFY2024.pdf>.

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- ¹⁸ Graeme Blair and David Hausman, “One Year of Immigration Enforcement Under the Second Trump Administration,” Deportation Data Project, Apr. 7, 2026, <https://deportationdata.org/analysis/immigration-enforcement-first-year.html>; Marianne LeVine, Emmanuel Martinez, and Alvaro Valiño, “ICE Shift in Tactics Leads to Soaring Number of At-Large Arrests, Data Shows,” Washington Post, Dec. 28, 2025, <https://www.washingtonpost.com/immigration/2025/12/28/ice-deportations-data-trump-arrests/>.
- ¹⁹ Exec. Order No. 14159, “Protecting the American People Against Invasion,” 90 Fed. Reg. 8443, Jan. 29, 2025, <https://www.federalregister.gov/documents/2025/01/29/2025-02006/protecting-the-american-people-against-invasion>.
- ²⁰ Christina Carrega, “A City-by-City Breakdown of Trump’s Immigration Raids and Troop Deployments,” Capital B News, Jan. 26, 2026, <https://capitalbnews.org/trump-national-guard-city-updates/>; Naureen Shah, *Deputized for Disaster: How President Trump’s 287(g) Deportation Force is A Powder Keg for our Communities*, American Civil Liberties Union, Feb. 26, 2026, <https://www.aclu.org/publications/deputized-for-disaster>.
- ²¹ Rachel Poser, Emily Bazelon, and Matthew Purdy, “The View From Inside Trump’s DHS,” The New York Times Magazine, Apr. 14, 2026, <https://www.nytimes.com/interactive/2026/04/14/magazine/trump-dhs-ice-officers-immigration-deportations.html>.
- ²² *Id.*
- ²³ Graeme Blair and David Hausman, “One Year of Immigration Enforcement Under the Second Trump Administration,” Deportation Data Project, Apr. 7, 2026, <https://deportationdata.org/analysis/immigration-enforcement-first-year.html> (referring to street arrests as “These arrests outside jails and prisons took place in places like neighborhoods, immigration courts, and check-in appointments at ICE offices.”)
- ²⁴ Laura Strickler, “ICE Has Arrested Nearly 75,000 People With No Criminal Records, Data Shows,” NBC News, Dec. 7, 2025, <https://www.nbcnews.com/politics/immigration/ice-arrested-nearly-75000-people-no-criminal-records-data-shows-rcna247377>.
- ²⁵ David J. Bier, “5% of People Detained By ICE Have Violent Convictions, 73% No Convictions,” Cato Institute (blog), Nov. 24, 2025, <https://www.cato.org/blog/5-ice-detainees-have-violent-convictions-73-no-convictions>; Deportation Data Project, “One Year of Immigration Enforcement Under the Second Trump Administration,” Apr. 7, 2026, <https://deportationdata.org/analysis/immigration-enforcement-first-year.html>.
- ²⁶ U.S. Department of Homeland Security, “Enforcement Actions in or Near Protected Areas,” Jan. 20, 2025, https://www.dhs.gov/sites/default/files/2025-03/25_0120_S1_enforcement-actions-in-near-protected-areas.pdf; U.S. Customs and Border Protection, “CBP Directive No. 4510-026B,” Dec. 2, 2025, https://www.cbp.gov/sites/default/files/2025-12/intc-44545_-_cbp_directive_no._4510-026b_usbp_redacted.pdf; Angelica Sedgwick Oun, “Stricter Rules Needed Around DHS Vehicle Pursuits,” Human Rights Watch, Mar. 5, 2026, <https://www.hrw.org/news/2026/03/05/stricter-rules-needed-around-dhs-vehicle-pursuits>; Sarah Blaskey, “ICE Training Was Slashed, Records Show, Corroborating Whistleblower Claims,” Washington Post, Mar. 3, 2026, <https://www.washingtonpost.com/investigations/2026/03/03/ice-training-cuts-graduation-rate/>.
- ²⁷ Whistleblower Aid, “—Anonymous Whistleblower Disclosure—,” Jan. 7, 2026, reproduced in AILA Doc. No. 26012200, <https://assets.aila.org/files/1d09fa66-a555-41dd-95df-49e96cdcb63d/26012200.pdf>; Senator Richard Blumenthal, letter to Kristi Noem, Secretary of Homeland Security, and Todd Lyons, Acting Director of U.S. Immigration and Customs Enforcement, Jan. 21, 2026, <https://www.hsgac.senate.gov/wp-content/uploads/2026-01-21-Letter-from-Blumenthal-to-DHS-ICE.pdf>.
- ²⁸ Rebecca Santana, “Homeland Security Makes Cuts to Offices Overseeing Civil Rights Protections,” The Associated Press, Mar. 21, 2025, <https://apnews.com/article/civil-rights-homeland-security-trump-immigration-0902c38dc7daf0a7960eb0d433c67f2f>.
- ²⁹ One Big Beautiful Bill Act, Public Law No. 119-21, July 4, 2025; American Immigration Council, “Immigration Challenges and Concerns in Implementing the One Big Beautiful Bill,” July 15, 2025, <https://www.americanimmigrationcouncil.org/blog/immigration-challenges-implementing-the-one-big-beautiful-bill>.
- ³⁰ Michael Waldman and Lauren-Brooke Eisen, “Big Budget Act Creates a ‘Deportation-Industrial Complex,’” Brennan Center for Justice, Aug. 13, 2025, <https://www.brennancenter.org/our-work/analysis-opinion/big-budget-act-creates-deportation-industrial-complex>.
- ³¹ Secure America Act, Public Law No. 119-98, June 10, 2026.
- ³² See: “Appropriations for FY2004: Department of Homeland Security,” Congressional Research Service, Jan. 12, 2004, https://www.congress.gov/crs_external_products/RA/PDF/RL31802/RL31802.4.pdf; Appropriations for FY2005: Department of Homeland Security,” CRS, Nov. 8, 2004, <https://www.congress.gov/crs-product/RL32302>; “Homeland Security Department: FY2006 Appropriations,” CRS, Jan. 24, 2006, https://www.everycrsreport.com/files/20060124_RL32863_16a74b94ea85e66411c848c8415dd66f797225a1.pdf; “Homeland Security Department: FY2007 Appropriations,” CRS, Nov. 17, 2006,

https://www.everycrsreport.com/files/20061117_RL33428_628a1c235a8886c899f33345691bcc1333a80ad1.pdf; “Homeland Security Department: FY2008 Appropriations,” CRS, Feb. 15, 2008, https://www.everycrsreport.com/files/20080215_RL34004_7f4e650ae7735696e586fe622393cbac00ffc9b9.pdf; “Homeland Security Department: FY2009 Appropriations,” CRS, Mar. 4, 2009, https://www.everycrsreport.com/files/20090304_RL34482_d15d6cd97629e899323b183bac51d24ebc25308b.pdf; “Homeland Security Department: FY2010 Appropriations,” CRS, Dec. 14, 2009, https://www.everycrsreport.com/files/20091214_R40642_945eeb240f18f3abc70df9ecc5f5ad972d805fb8.pdf; “Homeland Security Department: FY2012 Appropriations,” CRS, Feb. 21, 2012, https://www.congress.gov/crs_external_products/R/PDF/R41982/R41982.15.pdf; “Department of Homeland Security: FY2013 Appropriations,” CRS, June 21, 2013, https://www.everycrsreport.com/files/20130621_R42644_d718923a93627b8dbbf7fa6259dd30df3fd0fefe.pdf; “Department of Homeland Security: FY2014 Appropriations,” CRS, Apr. 18, 2014, https://www.everycrsreport.com/files/20140418_R43147_32b087019971531a0321a7a7770c9fe2af2da063.pdf; “Department of Homeland Security: FY2015 Appropriations,” CRS, June 2, 2015, https://www.everycrsreport.com/files/20150602_R43796_f0c6c670374a193c01acc1f53794fe5eea2e3bf8.pdf; “Department of Homeland Security Appropriations: FY2016,” CRS, Jan. 14, 2016, https://www.everycrsreport.com/files/20160114_R44053_cdb596e8b697d958d041716ec2ffede17fea9c97.pdf; “Department of Homeland Security Appropriations: FY2017,” CRS, Oct. 4, 2017, <https://www.congress.gov/crs-product/R44621>; “Department of Homeland Security Appropriations: FY2018,” CRS, May 22, 2018, https://www.everycrsreport.com/files/20180522_R44927_7cfa49444c52295dae85c80d02fcb9bf077f1da.pdf; “Department of Homeland Security Appropriations: FY2019,” CRS, Aug. 17, 2019, https://www.everycrsreport.com/files/20190807_R45268_77e08468601f74544be95cca07b59631e1843020.pdf; “Department of Homeland Security Appropriations: FY2020,” CRS, Jan. 21, 2020, https://www.everycrsreport.com/files/20200121_R46113_ccb1a2a7f7235ee1410cc6d52da1c6d8b0e202ea.pdf; “Department of Homeland Security Appropriations: FY2021,” CRS, May 24, 2021, https://www.everycrsreport.com/files/2021-05-24_R46802_3ce246cf90c1b59520e4ff8ccd0d961754fcl1a03.pdf; “Department of Homeland Security Appropriations: FY2022,” CRS, Mar. 24, 2022, https://www.everycrsreport.com/files/2022-03-24_R47005_d494059ccb0bacce6ec19db4d02dee7f43922fe5.pdf; “Comparing DHS Component Funding, FY2023: In Brief,” CRS, Jan. 10, 2023, <https://www.congress.gov/crs-product/R47220>; “Comparing DHS Component Funding, FY2024: In Brief,” CRS, May 3, 2024, <https://www.congress.gov/crs-product/R47678>; “Comparing DHS Component Funding, FY2025: In Brief,” CRS, May 12, 2025, <https://www.congress.gov/crs-product/R48115>; “Understanding the FY2026 DHS Budget Request,” CRS, Sept. 5, 2025, <https://www.congress.gov/crs-product/R48704>; Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extensions Act, 2026, Public Law 119–37, 119th Cong., 1st sess. (Nov. 12, 2025); Consolidated Appropriations Act, 2026, Public Law 119–75, 119th Cong., 2nd sess. (Feb. 3, 2026); Homeland Security and Further Additional Continuing Appropriations Act, 2026, Public Law 119–86, 119th Cong., 2nd sess. (Apr. 30, 2026); Secure America Act, Public Law 119–98, 119th Cong., 2nd sess. (Jun. 10, 2026); Department of Homeland Security, “U.S. Immigration and Customs Enforcement Budget Overview Fiscal Year 2027,” Apr. 30, 2026, https://www.dhs.gov/sites/default/files/2026-04/26_0403_ocfo_fy27-budget-immigration-and-customs-enforcement.pdf; Department of Homeland Security, “U.S. Customs and Border Protection Budget Overview Fiscal Year 2027,” Apr. 30, 2026, https://www.dhs.gov/sites/default/files/2026-04/26_0403_ocfo_fy27-budget-customs-and-border-protection.pdf.

³³ “Appropriations for FY2004: Department of Homeland Security,” Congressional Research Service, Jan. 12, 2004, https://www.congress.gov/crs_external_products/RA/PDF/RL31802/RL31802.4.pdf.

³⁴ Ryan J. Foley, “ICE Went on a Hiring Spree. Sterling Credentials Not Required,” The Associated Press, April 18, 2026 (updated), <https://apnews.com/article/ice-background-checks-vetting-immigration-8ae6b7b850f7c0265b3cb8b5060ef8fd>.

³⁵ Associated Press, “ICE’s Hiring Spree Led to Influx of Recruits With Questionable Qualifications, Investigation Shows,” The Guardian, April 17, 2026, <https://www.theguardian.com/us-news/2026/apr/17/ice-immigration-agents-backgrounds>.

³⁶ Senator Sheldon Whitehouse, “Whitehouse Demands DHS Produce Information on Disturbing Recruitment Tactics and Diluted Hiring Standards for ICE Agents - Senator Sheldon Whitehouse,” Feb. 26, 2026, <https://www.whitehouse.senate.gov/news/release/whitehouse-demands-dhs-produce-information-on-disturbing-recruitment-tactics-and-diluted-hiring-standards-for-ice-agents/>.

³⁷ David J. Bier, “ICE Has Diverted Over 25,000 Officers From Their Jobs,” Cato Institute (blog), Sept. 8, 2025,

<https://www.cato.org/blog/ice-has-diverted-over-25000-officers-their-jobs>.

³⁸ Aklea Lacy, “FBI Redirected a Quarter of Staff to Target Immigrants Under Trump’s Deportation Push,” The Intercept, <https://theintercept.com/2026/05/01/fbi-ice-immigration-enforcement/>.

³⁹ FWD.us, “New Data Reveals ICE Has Set Aside \$257 Million to Pay Local and State Law Enforcement,” April 9, 2026, <https://www.fwd.us/news/ice-payouts>; José Olivares, “Ex-watchdogs Warn Rush to Give Power to Local Police in Immigration Crackdown Risks ‘Threat to Civil Rights,’” The Guardian, Feb. 15, 2026, <https://www.theguardian.com/us-news/2026/feb/15/local-police-immigration-partnership-287g-civil-rights>.

⁴⁰ FWD.us, “New Data Reveals ICE Has Set Aside \$257 Million to Pay Local and State Law Enforcement,” Apr. 9, 2026, <https://www.fwd.us/news/ice-payouts/>; Meg Anderson, “ICE Is Giving Local Police Big Money to Help With Immigration Enforcement,” NPR, May 7, 2026, <https://www.npr.org/2026/05/07/nx-s1-5794322/ice-is-giving-local-police-big-money-to-help-with-immigration-enforcement>.

⁴¹ Naureen Shah, *Deputized for Disaster: How President Trump’s 287(g) Deportation Force is A Powder Keg for our Communities*, American Civil Liberties Union, Feb. 26, 2026, <https://www.aclu.org/publications/deputized-for-disaster>.

⁴² *Id.* 4-5.

⁴³ See 8 U.S.C. § 1357(a).

⁴⁴ See 8 U.S.C. § 1357(a)(2); see Congressional Research Service, “Immigration Arrests in the Interior of the United States: A Primer,” updated June 13, 2025, https://www.congress.gov/crs_external_products/LSB/PDF/LSB10362/LSB10362.7.pdf.

⁴⁵ Paul Murphy, “Border Patrol agents detain laborers across New Orleans metro area,” WWL-TV, Dec. 3, 2025 (updated), <https://www.wwltv.com/article/news/politics/immigration-news/immigration-enforcement/border-patrol-agents-detain-groups-of-immigrant-workers-in-new-orleans-area-as-swamp-sweep-intensifies/289-0af09e8b-e658-477d-afc9-62670474f2b3>.

⁴⁶ U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, Case: 1:25-cv-12173 Document #: 338-46 (7th Circuit), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.46.pdf>.

⁴⁷ U.S. Immigration and Customs Enforcement, Worksite Enforcement Investigations, Feb. 20, 2026 (updated), <https://www.ice.gov/hsi/investigate/worksite-enforcement-investigations>.

⁴⁸ Lucy Campbell, “Federal agents launch immigration crackdown in New Orleans,” The Guardian, Dec. 3, 2025, <https://www.theguardian.com/us-news/2025/dec/03/new-orleans-ice-crackdown>; Paul Murphy, “Border Patrol Agents Detain Laborers Across New Orleans Metro Area,” WWL Louisiana, Dec. 3, 2025 (updated), <https://www.wwltv.com/article/news/politics/immigration-news/immigration-enforcement/border-patrol-agents-detain-groups-of-immigrant-workers-in-new-orleans-area-as-swamp-sweep-intensifies/289-0af09e8b-e658-477d-afc9-62670474f2b3>.

⁴⁹ Andrés Fuentes, “ICE, Kenner police arrest 4 undocumented immigrants outside Home Depot,” WAFB, Sept. 11, 2025, <https://www.wafb.com/2025/09/12/ice-kenner-police-arrest-4-undocumented-immigrants-outside-home-depot/>.

⁵⁰ Tara Lynch, “ICE shares video of immigration arrests in Baltimore,” CBS News Baltimore, May 29, 2025, <https://www.cbsnews.com/baltimore/news/video-ice-immigration-abrego-garcia-casa-home-depot-maryland/>; U.S. Immigration and Customs Enforcement (@ICEgov), May 27, 2025, <https://x.com/ICEgov/status/1927515179958329390>.

⁵¹ Anugrah Kumar, “‘Beloved pillar of our community’: ICE arrests Maryland pastor who overstayed his visa 24 years ago,” Christian Post, July 26, 2025, <https://www.christianpost.com/news/beloved-pillar-of-our-community-ice-arrests-maryland-pastor.html>; Alaa Elassar, “Pastor and father of 3 arrested for overstaying visa a quarter-century ago,” CNN, July 25, 2025, <https://edition.cnn.com/2025/07/25/us/ice-maryland-pastor-fuentes-espinal>.

⁵² Randy Gyllenhaal and Izzy Stroobandt, “11 Detained During Immigration Raid at O’Hare Rideshare Parking Lot,” NBC Chicago, Oct. 18, 2025 (updated), <https://www.nbcchicago.com/news/local/11-detained-during-immigration-raid-at-ohare-rideshare-parking-lot/3840456/>; Quintana Garcilazo v. Olson, No. 25 CV 13321, Order Granting Petition for Writ of Habeas Corpus (N.D. Ill. Oct. 31, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.489016/gov.uscourts.ilnd.489016.7.0.pdf>.

⁵³ Sophia Tareen, “Border Patrol Official Behind Chicago Immigration Crackdown Defends Tactics as Trump Cheers Him On,” The Associated Press, Nov. 4, 2025 (updated), <https://apnews.com/article/immigration-chicago-arrests-police-federal-5c21bcb2cd890fcb086480469c1a3a96>.

⁵⁴ Jasmine Garsd, “A family’s fishing trip ends with the dad at ‘Alligator Alcatraz.’ Here’s their story,” NPR, Aug. 9, 2025, <https://www.npr.org/2025/08/09/nx-s1-5479213/this-is-a-death-camp-advocates-and-detainees-warn-about-conditions-at-alligator-alcatraz>; B A Parker and Jasmine Garsd, “How undocumented families are navigating the

looming threat of ICE,” NPR transcript, Nov. 19, 2025, <https://www.npr.org/transcripts/nx-s1-5553426>.

⁵⁵ Naureen Shah, *Deputized for Disaster: How President Trump’s Supersized 287(g) Deportation Force is a Powder Keg for Law Enforcement, Our Communities, and Our Democracy*, American Civil Liberties Union, Feb. 26, 2026, <https://www.aclu.org/publications/deputized-for-disaster>.

⁵⁶ “The Florida Cops Who Act as ICE Agents,” The Wall Street Journal (transcript), Sept. 22, 2025, <https://www.wsj.com/podcasts/the-journal/the-florida-cops-who-act-as-ice-agents/1b8d4470-7f9d-46d6-bb99-e44df4e939fc>.

⁵⁷ Claire Healy, Ana Claudia Chacin, Shirsho Dasgupta, and Churchill Ndonwie, “Caught in the Crackdown: Florida’s deportation campaign sweeps up 20,000, including those with clean records,” Miami Herald, Mar. 3, 2026 (updated), <https://www.miamiherald.com/news/local/immigration/article313214962.html>.

⁵⁸ Gabrielle Bayness, Quincy Blair, Emily Reina Dindial, Kelly McConney Moore, and Scarlet Neath, *Safe Roads for All: Evidence-Based Strategies for Keeping Our Roadways Safe*, American Civil Liberties Union, April 13, 2026, <https://www.aclu.org/documents/safe-roads-for-all>.

⁵⁹ Caroline Haskins, “The Louisiana Department of Wildlife and Fisheries Is Detaining People for ICE,” WIRED, Dec. 4, 2025, <https://www.wired.com/story/story/the-louisiana-department-of-wildlife-and-fisheries-is-detaining-people-for-ice/>; NBC6, “Nearly 800 Florida Fish and Wildlife officers have ICE credentials: FWC,” NBC 6 South Florida, Aug. 5, 2025, <https://www.nbcmiami.com/news/local/nearly-800-florida-wildlife-officers-have-agreements-with-ice-fhp/3673012/>; “Unmasking ICE’s Collusion with Law Enforcement in Virginia,” Legal Aid Justice Center, <https://www.justice4all.org/what-we-do/immigration/icecontracts/>.

⁶⁰ Caroline Haskins, “The Louisiana Department of Wildlife and Fisheries Is Detaining People for ICE,” WIRED, Dec. 4, 2025, <https://www.wired.com/story/story/the-louisiana-department-of-wildlife-and-fisheries-is-detaining-people-for-ice/>.

⁶¹ *Id.*

⁶² Ms. L v ICE, No 3:18-cv-00428-DMS-AHG, Doc. 943 (S.D. Cal, Oct. 16, 2023), <https://storage.courtlistener.com/recap/gov.uscourts.casd.564097/gov.uscourts.casd.564097.943.0.pdf>; Cary Aspinwall, “They Endured Child Separation and Received Legal Status. Now ICE Is Trying to Deport Them,” The Marshall Project, Apr. 1, 2026, <https://www.themarshallproject.org/2026/04/01/ice-arrests-child-separation-settlement>.

⁶³ John Simerman and Sophie Kasakove, “Oystermen grieve Honduran deckhand who drowned fleeing feds during Louisiana immigration sweeps,” Jan. 15, 2026, https://www.nola.com/news/crime_police/louisiana-seafood-worker-dies-immigration-crackdown/article_75201a16-5e2e-4d29-95f2-83c0c36789d9.html.

⁶⁴ *Graham v. Connor*, 490 U.S. 386 (1989), <https://supreme.justia.com/cases/federal/us/490/386/>.

⁶⁵ Federal agents operate under less restrictive rules. For example, Border Patrol policy permits the use of oleoresin capicum spray – commonly known as pepper spray – against people offering “at a minimum, active resistance.” U.S. Customs and Border Protection, Use of Force Policy, Jan. 2021, https://www.cbp.gov/sites/default/files/2024-09/exhibit_09_-_cbp_use_of_force_policy_final_jan_2021.pdf.

⁶⁶ U.S. Department of Justice, “1-16.000 - Department of Justice Policy On Use Of Force,” updated Jan. 2025, <https://www.justice.gov/jm/1-16000-department-justice-policy-use-force>; “National Consensus Policy and Discussion Paper on Use of Force,” revised July 2020, <https://fop.net/wp-content/uploads/2021/04/national-consensus-policy-on-use-of-force-20200710v3.pdf>; U.S. Department of Justice Civil Rights Division, Investigation of the City of Phoenix and the Phoenix Police Department, June 13, 2024, <https://www.justice.gov/d9/2024-06/Phoenix%20Findings%20Report%20Final%20-%20Final%20508.pdf>.

⁶⁷ Nicole Foy and McKenzie Funk, “We Found More Than 40 Cases of Immigration Agents Using Banned Chokeholds and Other Moves That Can Cut Off Breathing,” ProPublica, Jan. 13, 2026, <https://www.propublica.org/article/videos-ice-dhs-immigration-agents-using-chokeholds-citizens>.

⁶⁸ Illinois Accountability Commission, “Arrest and Beating in Melrose Park Investigation Brief,” Apr. 2026, <https://ilac.illinois.gov/content/dam/soi/en/web/ilac/documents/final-report/inv-briefs/IAC-Melrose-Park-Investigation-Brief-r.pdf>; Chip Mitchell, Tom Schuba, Sophie Sherry, Alden Loury, and Frank Main, “Tear Gas, Car Crashes, Chokeholds: Risky Tactics Have Driven Trump’s Chicago Deportation ‘Blitz,’” Chicago Sun-Times, Nov. 14, 2025, <https://chicago.suntimes.com/the-watchdogs/2025/11/14/ice-bovino-border-patrol-homeland-security-chicago-police-department>; Mary Norkol, “Suburban Man Hospitalized After Arrest by ICE Agents,” Chicago Sun-Times, Nov. 2, 2025, <https://chicago.suntimes.com/immigration/2025/11/02/suburban-man-arrest-ice-hospitalized>.

⁶⁹ Nicole Foy and McKenzie Funk, “‘We’ll Smash The Fucking Window Out And Drag Him Out,’” ProPublica, July 31, 2025, <https://projects.propublica.org/trump-ice-smashed-windows-deportation-arrests/>.

⁷⁰ Taylor Dolven, “‘There’s a Baby!’ ICE Agents Stop Alamosa Family at Gunpoint, Smash Car Window,” The Colorado Sun, Oct. 1, 2025, <https://coloradosun.com/2025/10/01/ice-alamosa-arrest-gunpoint-infant/>; Priscilla A.

Waggoner, “ICE Agents Draw Weapon, Break Car Window While Arresting Alamosa Man,” Alamosa News, Oct. 1, 2025, <https://www.alamosanews.com/stories/ice-agents-draw-weapon-break-car-window-while-arresting-alamosa-man.103677>.

⁷¹ The last publicly posted E-STAR reports date from FY2022. “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Use of Force,” U.S. Customs and Border Protection, <https://www.cbp.gov/document/foia-record/enforcement-action-statistical-analysis-and-reporting-system-e-star-use-force>.

⁷² U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, No. 25-3023 (7th Cir.), No 1:25-cv-12173 Document #: 338-47 (7th Cir.), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.47.pdf>. The report refers to the deployment of Oleoresin Capsicum (OC) spray, which is commonly known as “pepper spray.”

⁷³ U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, No. 25-3023 (7th Cir.), No 1:25-cv-12173 Document #: 338-46 (7th Cir.), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.46.pdf>.

⁷⁴ U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, No 1:25-cv-12173 Document #: 338-41 (7th Cir.), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.41.pdf>.

⁷⁵ U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, Case: 1:25-cv-12173 Document #: 338-12 (7th Circuit), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.12.pdf>.

⁷⁶ Tracy Lehr, “Oxnard Man Released After Being Detained by ICE Agents While Filming Father’s Arrest,” News Channel 3-12, June 17, 2025, <https://keyt.com/news/ventura-county/2025/06/17/u-s-citizen-held-by-ice-released/>.

⁷⁷ Leo Stallworth and Leanne Suter, “ICE Agents Ram Car to Take Man Into Custody in Boyle Heights,” ABC7 Los Angeles, June 11, 2025, <https://abc7.com/post/federal-agents-involved-boyle-heights-crash-accused-hit-run-lapd-investigating/16724558/>; Alex Rozier, Jonathan Lloyd, and Lauren Coronado, “Video Shows Federal Agents Pin Car in Boyle Heights and Detain Man Wanted in Paramount ICE Raid Protest,” NBC Los Angeles, June 11, 2025, <https://www.nbclosangeles.com/news/local/video-boyle-heights-crash/3721526/>; Christopher Buchanan and Richard Winton, “Federal Agents Use Vehicles to Trap and Arrest Driver in Boyle Heights, Leaving Child and Passenger Behind,” Los Angeles Times, June 11, 2025, <https://www.latimes.com/california/story/2025-06-11/boyle-heights-feds-crash-detain-driver>; FOX 11 Digital Team, “Boyle Heights Arrest Sparks Outcry After Tear Gas Used on Car With Family Inside,” June 11, 2025, <https://www.foxla.com/news/la-ice-federal-agents-in-hit-and-run>.

⁷⁸ Chip Mitchell, Dan Mihalopoulos, Tom Schuba, Sophie Sherry, Alden Loury, and Frank Main, “Tear Gas, Car Crashes, Chokeholds: Risky Tactics Have Driven Trump’s Chicago Deportation ‘Blitz,’” WBEZ Chicago, Nov. 17, 2025, <https://www.wbez.org/immigration/2025/11/14/ice-bovino-border-patrol-homeland-security-chicago-police-department>.

⁷⁹ Declaration of Pastor Benjamin Squires, ECF No. 190-9, Castañon Nava v. Department of Homeland Security, No. 1:25-cv-12173 (N.D. Ill. Nov. 3, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.190.9.pdf>; Lissette Nuñez, “Chase involving feds results in crashes, ends in arrests at Gurnee high school campus: police,” ABC7 Chicago, Oct. 30, 2025, <https://abc7chicago.com/post/chase-involving-federal-agents-results-crashes-ends-arrests-warren-township-high-schools-oplaine-campus-gurnee-police/18090932/>.

⁸⁰ Jermont Terry, “U.S. Citizen Tased and Detained During ICE Operation in Des Plaines, Illinois,” CBS News Chicago, Sept. 16, 2025, <https://www.cbsnews.com/chicago/news/u-s-citizen-tased-detained-during-ice-operation-des-plaines/>; Vi Nguyen, “Video: 3 Men, Including U.S. Citizen, Detained by ICE at Des Plaines Gas Station,” NBC Chicago, Sept. 17, 2025, <https://www.nbcchicago.com/news/local/video-3-men-including-u-s-citizen-detained-by-ice-at-des-plaines-gas-station/3825885/>; Jack Lemnus, “Why 4 Legal Residents Arrested During ICE, FHP Immigration Raids on Florida Treasure Coast,” Treasure Coast Newspapers, Nov. 3, 2025, <https://www.tcpalm.com/story/news/local/florida/2025/11/03/ice-boarder-patrol-stuart-arrests-legal-treasure-coast-immigration-raid-fort-pierce-florida/86971450007/>; Morgan Stephens, “Protesters Swarm Albuquerque Walmart Where Man Was Arrested by ICE,” KOB, July 21, 2025, <https://www.kob.com/news/protesters-swarm-albuquerque-walmart-where-man-was-arrested-by-ice/>.

⁸¹ Chicago Headline Club v. Noem (7th Cir.), Attachment to Exh. 138, <https://spaces.hightail.com/space/ERC1kyY4Cj/files/fi-ee68b78b-2ba0-4355-b2a1-49e1d5243c7c/fv-946d3e13-2b8d-4317-bb54-fbe69fd3ef09/2025.10.31.MP4>.

⁸² Marisa Kabas, “ICE agents point guns at bystanders during violent arrest in Maryland,” The Handbasket, Sept. 26,

- 2025, <https://www.thehandbasket.co/p/ice-agents-guns-arrest-hyattsville-witnesses>; Darcy Spencer, “Video shows officer drop gun then appear to point it during apparent ICE arrest,” NBC4 Washington, Sept. 25, 2025, <https://www.nbcwashington.com/news/local/prince-georges-county/video-officer-gun-ice-arrest/3993797/>; Tara Lynch, “Community outrage after ICE arrest in Maryland turns chaotic,” CBS News Baltimore, Sept. 29, 2025, <https://www.cbsnews.com/baltimore/news/prince-georges-county-ice-arrest-caught-on-camera-hyattsville/>.
- ⁸³ Cate Cauguiran, “Group of workers reportedly detained while working on roof in Naperville, homeowner says,” ABC7 Chicago, Sept. 18, 2025, <https://abc7chicago.com/post/naperville-news-group-workers-reportedly-detained-agents-believed-ice-working-roof-homeowner-says/17838441/>.
- ⁸⁴ Alexis Wainwright, “Bowie father denied bond after ICE arrest,” WUSA9, Oct. 17, 2025, <https://www.wusa9.com/article/news/politics/immigration-news/bowie-father-denied-bond-ice-arrest/65-87d03a78-5301-45b5-9efd-2d6467f721ff>; WJZ, “Bowie father arrested by ICE in front of children, family says he has a valid work permit,” Oct. 16, 2025, <https://www.youtube.com/watch?v=41A7VYt9zWI>.
- ⁸⁵ Jonah Valdez, “A Pattern of Violence: Documenting ICE Agents’ Brutal Use of Force in LA Immigration Raids,” The Intercept, July 7, 2025, <https://theintercept.com/2025/07/07/ice-raids-la-violence-video-bystanders/>; “Migra Migra sábado 21 de junio Calle Unión, entre Wilshire y Calle 6 Los Ángeles CA a lado de Home Depot,” TikTok video, @dianalu213, June 21, 2025, <https://www.tiktok.com/@dianalu213/video/7518555194074909982> (linked in The Intercept).
- ⁸⁶ Gina Silva, “US citizen says he was racially profiled as federal agents detained him outside his job,” FOX 11 Los Angeles, Aug. 22, 2025, <https://www.foxla.com/news/us-citizen-detained-by-ice-simi-valley-rodrigo-almendarez>; FOX 11 Los Angeles, “ICE agents detain US Citizen outside job in Southern California,” Aug. 22, 2025, <https://www.youtube.com/watch?v=oQCYszFQYmY>.
- ⁸⁷ Martin Daniel Rascon, “Statement for February 3, 2026, Congressional Hearing,” Office of Senator Richard Blumenthal, Feb. 3, 2026, https://www.blumenthal.senate.gov/download/2026-2-3_daniel_rascon_statement; Anabel Munoz, “Federal agent fires shots at man during operation in San Bernardino, DHS says,” ABC7 Los Angeles, Aug. 17, 2025, <https://abc7.com/post/federal-agents-fire-shots-man-during-operation-san-bernardino-police-say/17562097/>; Amber Frias and Helen Jeong, “Federal agents open fire at family truck in San Bernardino. But 2 different accounts describe what caused shooting,” NBC4 Los Angeles, Aug. 16, 2025, <https://www.nbclosangeles.com/news/local/san-bernardino-family-claims-federal-agents-shot-at-truck-shattered-windows/3765321/>; Melissa Gomez, “Immigration officer fires shots at vehicle with people inside in San Bernardino operation,” Los Angeles Times, Aug. 16, 2025, <https://www.latimes.com/california/story/2025-08-16/federal-agents-fire-shots-during-operation-san-bernardino>; Jaimie Ding, “Federal agent fires weapon during immigration stop in Southern California, officials say,” The Associated Press, Aug. 18, 2025, <https://apnews.com/article/773d493f24050314dfff622b3b04bcd6>; Andrea Castillo, “San Bernardino man arrested after he protested immigration officer shooting at his truck,” Los Angeles Times, Aug. 29, 2025, <https://www.latimes.com/california/story/2025-08-29/san-bernardino-man-arrested-immigration-officers-shot-at-his-truck>.
- ⁸⁸ Morgan Fischer, “An ICE agent shot at a man during a traffic stop on Interstate 17,” Phoenix New Times, Oct. 29, 2025, <https://www.phoenixnewtimes.com/news/an-ice-agent-shot-at-a-man-during-a-traffic-stop-on-interstate-17-40616710/>; TJ L’Heureux, “‘ICE is violence’: Activists hold vigil for man shot at by federal agent,” Phoenix New Times, Oct. 30, 2025, <https://www.phoenixnewtimes.com/news/phoenix-activists-hold-vigil-for-injured-man-shot-at-by-ice-agent-40616738/>; Jennifer Mascia, “How Many People Have Been Shot in ICE Raids?,” The Trace, Dec. 8, 2025, updated May 4, 2026, <https://www.thetrace.org/2025/12/immigration-ice-shootings-guns-tracker/>; Brent Corrado, “Man hurt in shooting involving ICE officer on I-17,” FOX 10 Phoenix, Oct. 29, 2025, <https://www.fox10phoenix.com/news/ice-incident-blocks-traffic-i-17-north-phoenix>.
- ⁸⁹ Soumya Karlamangla, “Man Shot by ICE Was Not Trying to Run Over Agent, Lawyers Say,” New York Times, Nov. 3, 2025, <https://www.nytimes.com/2025/11/03/us/ontario-ice-agent-shooting.html>; Rachel Uranga, “U.S. citizen shot from behind as he warned ICE agents about children gathering at bus stop, lawyers say,” Los Angeles Times, Nov. 2, 2025, <https://www.latimes.com/california/story/2025-11-02/lawyers-say-ice-shot-us-citizen-from-behind-as-he-stopped-to-warn-them-of-children>; Laura Romero, “Lawyers for US citizen shot by ICE agent say shooting was not self-defense,” ABC News, Nov. 4, 2025, <https://abcnews.com/US/lawyers-us-citizen-shot-ice-agent-shooting-defense/story?id=127180596>; Rob McMillan, “Attorney for Ontario man shot by ICE agent disputes claim that his client tried to assault officers,” ABC7 Los Angeles, Nov. 12, 2025, <https://abc7.com/post/attorney-ontario-man-shot-ice-agent-disputes-claim-client-tried-assault-officers/18144328/>.
- ⁹⁰ Rachel Uranga, “Man shot in back by ICE pleads not guilty to assault charges,” Los Angeles Times, Nov. 25, 2025, <https://www.latimes.com/california/story/2025-11-25/man-shot-in-back-by-ice-pleads-not-guilt->

[to-assault-charges](#); United States v. Jimenez, No. 5:25-cr-00366 (C.D. Cal.), <https://www.nacdl.org/brief/United-States-v-Jimenez>.

⁹¹ Alex Mann, “Feds charge man shot by ICE agents in Glen Burnie with resisting arrest,” The Baltimore Banner, Jan. 21, 2026, <https://www.thebanner.com/community/criminal-justice/ice-glen-burnie-shooting-arrest-tiago-alexandre-sousa-martins-EJFF3DUODBBGTM5HJ6KTK4SU4/>; Dakin Andone and Michelle Watson, “Department of Homeland Security changes story of Maryland ICE shooting after local police release contradicting details,” CNN, Jan. 13, 2026, <https://www.cnn.com/2026/01/13/us/ice-shooting-maryland-immigration-hnk>.

⁹² U.S. House Committee on Oversight and Government Reform, Democratic Staff, *Operation Metro Surge: How Federal Enforcement Led to the Killings of Renée Good and Alex Pretti*, Feb. 3, 2026, https://oversightdemocrats.house.gov/imo/media/doc/mn_oversight_report.pdf.

⁹³ Written Statement of Marimar Martinez, House Homeland Security Committee, “Funding Lapse and Security Gaps: Assessing the Harmful Impacts of the DHS Shutdown on Americans, Part II,” Apr. 22, 2026, <https://homeland.house.gov/wp-content/uploads/2026/04/2026-04-22-HRG-Testimony.pdf>.

⁹⁴ Barnes v. Felix, 605 U.S. ___ (2025), <https://supreme.justia.com/cases/federal/us/605/23-1239/>.

⁹⁵ 8 CFR § 287.8 Standards for enforcement activities, <https://www.law.cornell.edu/cfr/text/8/287.8/>.

⁹⁶ 8 CFR § 287.8 Standards for enforcement activities, <https://www.law.cornell.edu/cfr/text/8/287.8>.

⁹⁷ See Department of Homeland Security, Update to the Department Policy on Use of Force, Policy Statement 044-05 (Revision 01), Feb. 6, 2023, https://www.dhs.gov/sites/default/files/2023-02/23_0206_s1_use-of-force-policy-update.pdf.

⁹⁸ Leila Rafei, “This Deceptive ICE Tactic Violates the Fourth Amendment,” *American Civil Liberties Union*, April 12, 2023, <https://www.aclu.org/news/immigrants-rights/this-deceptive-ice-tactic-violates-the-fourth-amendment>.

⁹⁹ Chelsea Bailey, “Reporter’s Notebook: I stopped for gas and witnessed an ICE arrest. Then, I spent days looking for the man who was detained,” CNN, Aug. 25, 2025 (updated), <https://edition.cnn.com/2025/08/23/us/ice-detention-arrest-maryland>.

¹⁰⁰ Reyna Preciado, “Southside neighbors confront TEP impersonators, suspected immigration enforcement officers,” KGUN 9, May 29, 2025 (updated), <https://www.kgun9.com/news/community-inspired-journalism/southside-news/southside-neighbors-confront-tep-impersonators-suspected-immigration-enforcement-officers>; Emily Bregel, “Immigration agents pretend to be utility workers, Tucson neighbors claim,” *Arizona Daily Star*, May 31, 2025, https://tucson.com/news/local/border/article_e949f7c5-d339-4546-804c-cbb3c970af38.html.

¹⁰¹ Gloria Rebecca Gomez, “ICE says an immigrant rammed agent’s car, witnesses say otherwise,” *Arizona Mirror*, Oct. 24, 2025, <https://azmirror.com/2025/10/24/ice-says-an-immigrant-rammed-agents-car-witnesses-say-otherwise/>.

¹⁰² Valentina Palm, “He Lived an Immigrant’s Nightmare. One Problem: He’s a Citizen, Got His Arrest on Video,” *USA Today*, July 26, 2025, <https://www.usatoday.com/story/news/nation/2025/07/26/ice-raids-florida-citizen-immigrant-nightmare-arrested/85328304007/>.

¹⁰³ Naureen Shah, *Deputized for Disaster: How President Trump’s Supersized 287(g) Deportation Force is a Powder Keg for Law Enforcement, Our Communities, and Our Democracy*, American Civil Liberties Union, Feb. 26, 2026, <https://www.aclu.org/publications/deputized-for-disaster>.

¹⁰⁴ Valentina Palm, “He Lived an Immigrant’s Nightmare. One Problem: He’s a Citizen, Got His Arrest on Video,” *USA Today*, July 26, 2025, <https://www.usatoday.com/story/news/nation/2025/07/26/ice-raids-florida-citizen-immigrant-nightmare-arrested/85328304007/>; Claire Considine, “Immigration agents told a teenage US citizen: ‘You’ve got no rights.’ He secretly recorded his brutal arrest,” *The Guardian*, July 25, 2025, <https://www.theguardian.com/us-news/2025/jul/25/florida-teen-immigration-arrest>; Wilkine Brutus, Sergio R. Bustos, “Prosecutors won’t pursue criminal charges against U.S. citizen in aggressive Border Patrol arrest video,” *WLRN*, July 30, 2025, <https://www.wlrn.org/immigration/2025-07-30/immigration-arrest-video-undocumented-palm-beach-county>.

¹⁰⁵ Melanie Asmar, “Denver Public Schools Sues Feds to Stop Immigration Enforcement at Schools, ‘Sensitive Locations,’” *Chalkbeat Colorado*, Feb. 12, 2025, <https://www.chalkbeat.org/colorado/2025/02/13/denver-district-sues-ice-to-stop-immigration-enforcement-at-schools/>; Jenny Brundin, “An Anxious Week for Some School Districts in Colorado Comes to a Close,” *Colorado Public Radio*, Feb. 8, 2025, <https://www.cpr.org/2025/02/08/an-anxious-week-for-some-school-districts-in-colorado-comes-to-a-close/>.

¹⁰⁶ Chase Woodruff, “ICE agents conduct operations in multiple Denver, Aurora locations,” *Colorado Newline*, Feb. 5, 2025, <https://coloradonewline.com/2025/02/05/ice-operations-denver-aurora/>; Jennifer Brown, “ICE Hasn’t Revealed How Many People Were Detained During Raids of Denver, Aurora Apartment Complexes,” *Colorado Sun*, Feb. 7, 2025, Feb. 10, 2025 (updated), <https://coloradosun.com/2025/02/07/immigration-raid-detainees/>.

- ¹⁰⁷ Jenny Brundin and Andrew Villegas, “An Anxious Week for Some School Districts in Colorado Comes to a Close,” CPR News, Feb. 8, 2025, <https://www.cpr.org/2025/02/08/an-anxious-week-for-some-school-districts-in-colorado-comes-to-a-close/>.
- ¹⁰⁸ Melanie Asmar, “Denver Public Schools Sues Feds to Stop Immigration Enforcement at Schools, ‘Sensitive Locations,’” Chalkbeat Colorado, Feb. 12, 2025, <https://www.chalkbeat.org/colorado/2025/02/13/denver-district-sues-ice-to-stop-immigration-enforcement-at-schools/>.
- ¹⁰⁹ Lillian Perlmutter, “ICE arrest outside Encinitas elementary school sparks new round of public outcry,” Times of San Diego, Aug. 20, 2025, <https://timesofsandiego.com/politics/2025/08/20/encinitas-elementary-school-ice-arrest/>; Landon Block, “Opinion: ICE arrest of parent near my Encinitas school is just cruelty,” Times of San Diego, Aug. 22, 2025, <https://timesofsandiego.com/opinion/2025/08/22/ice-arrest-parent-near-encinitas-school-just-cruel/>.
- ¹¹⁰ Danielle Smith and Brenda Gregorio-Nieto, “ICE arrests parent waiting to pick up child block from Linda Vista Elementary: SDUSD,” NBC 7 San Diego, Aug. 14, 2025, <https://www.nbcsandiego.com/news/local/parent-detained-by-ice-near-linda-vista-elementary-school/3886880/>; Brenden Tuccinardi and Tammy Murga, “San Diego Unified responds to ICE arrest outside Linda Vista Elementary,” KPBS, Aug. 15, 2025, <https://www.kpbs.org/news/border-immigration/2025/08/15/san-diego-unified-responds-to-ice-arrest-outside-linda-vista-elementary>.
- ¹¹¹ Perla Shaheen, “ICE agents detain parent near elementary school during morning drop-off,” ABC 10News San Diego, Aug. 7, 2025, <https://www.10news.com/news/ice-agents-detain-parent-near-elementary-school-during-morning-drop-off>.
- ¹¹² Rachel Louise Just, “ICE activity growing around Valley schools, watchdog says,” ABC15 Arizona, Aug. 11, 2025 (updated), <https://www.abc15.com/news/local-news/ice-activity-growing-around-valley-schools-watchdog-says>; Rhonda Cagle, “ICE detained 2 as kids walked to a Phoenix school. This is not OK | Opinion,” AZ Central, Aug. 7, 2025, <https://www.azcentral.com/story/opinion/op-ed/2025/08/07/ice-detention-roosevelt-school-phoenix-immigration/85553722007/>; Kylie Wener, “Hobbs condemns ICE activity near schools, says Arizona not in federal detention business,” KTAR News, Aug. 13, 2025 (updated), <https://ktar.com/arizona-news/katie-hobbs-ice-schools-federal/5738340/>.
- ¹¹³ NMILC Communications, “He Reported Me to ICE”: ICE Is Detaining Domestic Violence Survivors,” NMILC, Oct. 30, 2025, <https://www.nmilc.org/our-blog/ice-is-detaining-domestic-violence-survivors>.
- ¹¹⁴ Gabe Vasquez, “OPINION: On New Mexico’s Border, ICE’s Raids Are Making Us Less Safe,” Albuquerque Journal, Nov. 1, 2025, <https://www.abqjournal.com/opinion/opinion-on-new-mexicos-border-ices-raids-are-making-us-less-safe/2905374/>; Julianne McShane, “LA’s ICE Raids Are Impacting Domestic Violence Shelters,” Mother Jones, June 12, 2025, <https://www.motherjones.com/politics/2025/06/la-ice-raids-domestic-violence-shelters/>.
- ¹¹⁵ Atavia Reed, “Bronzeville Homeless Shelter Residents ‘Traumatized’ After Feds Chase, Arrest 4 People,” Block Club Chicago, Oct. 1, 2025, <https://blockclubchicago.org/2025/10/01/bronzeville-homeless-shelter-residents-traumatized-after-feds-chase-arrest-4-people/>; Molly DeVore, “ICE Detains 2 People Outside NW Side Homeless Shelter, Angering Elected Officials,” Block Club Chicago, Sept. 25, 2025, <https://blockclubchicago.org/2025/09/25/ice-detains-2-people-outside-nw-side-homeless-shelter-angering-elected-officials/>.
- ¹¹⁶ Carolyn Y. Johnson, David Ovalle, and Sabrina Malhi, “Patient Seeking Care at NIH Hospital Detained by ICE,” The Washington Post, Aug. 8, 2025 (updated), <https://www.washingtonpost.com/health/2025/08/08/nih-clinical-center-ice-arrest/>.
- ¹¹⁷ Mekahlo Medina and Missael Soto, “Pregnant US Citizen Speaks Out After Being Detained by ICE Agents Searching for Her Husband,” NBC Los Angeles, Aug. 7, 2025, <https://www.nbclosangeles.com/news/local/pregnant-us-citizen-speaks-out-ice-immigration/3761282/>; NBC News, Aug. 2025, <https://www.instagram.com/reel/DND2pNRpiE2/>.
- ¹¹⁸ Sean Mahoney, “Protestors gather after man detained at St. Joseph’s Hospital in Tucson,” KOLD, May 13, 2025, <https://www.kold.com/2025/05/13/protestors-gather-after-man-detained-st-josephs-hospital-tucson/>; Andrew Christiansen, “Party for Socialism and Liberation protests undocumented migrant detained at Tucson hospital,” KGUN 9, May 13, 2025, <https://www.kgun9.com/news/community-inspired-journalism/eastside-news/party-for-socialism-and-liberation-protests-undocumented-migrant-detained-at-tucson-hospital>.
- ¹¹⁹ Claudia Boyd-Barrett, “‘I Can’t Tell You’: Attorneys and Relatives Struggle to Find Hospitalized ICE Detainees,” Los Angeles Times, Jan. 30, 2026, <https://www.latimes.com/science/story/2026-01-30/attorneys-relatives-struggle-to-find-hospitalized-ice-detainees>; Ana B. Ibarra and Kristen Hwang, “ICE is suddenly showing up in California hospitals. Workers want more guidance on what to do,” CalMatters, Aug. 26, 2025, <https://calmatters.org/health/2025/08/immigration-hospitals-workers-fear/>. In May 2026, the Los Angeles County Board of Supervisors created an oversight committee and expanded staff training at county medical facilities to

implement the Department of Health Services' March 2026 civil law enforcement policy covering interactions with federal immigration agents. Pasadena Now, "L.A. County Moves to Shield Hospital Workers and Patients From Immigration Enforcement," May 13, 2026, <https://pasadenanow.com/main/l-a-county-moves-to-shield-hospital-workers-and-patients-from-immigration-enforcement>.

¹²⁰ Claudia Boyd-Barrett, "I Can't Tell You": Attorneys and Relatives Struggle to Find Hospitalized ICE Detainees," Los Angeles Times, Jan. 30, 2026, <https://www.latimes.com/science/story/2026-01-30/attorneys-relatives-struggle-to-find-hospitalized-ice-detainees>.

¹²¹ Claudia Boyd-Barrett, "I Can't Tell You": Attorneys and Relatives Struggle to Find Hospitalized ICE Detainees," Los Angeles Times, Jan. 30, 2026, <https://www.latimes.com/science/story/2026-01-30/attorneys-relatives-struggle-to-find-hospitalized-ice-detainees>.

¹²² Jill Replogle, "At a Boyle Heights Hospital, ICE Agents Call the Shots, Doctors Say," LAist, Oct. 9, 2025, <https://laist.com/news/politics/boyle-heights-hospital-ice-agents-patient-care-privacy-rights>.

¹²³ Larry Buhl, "Woman ICE Stalked at Two SoCal Hospitals Is Now in Federal Custody," LA Public Press, July 21, 2025, <https://lapublicpress.org/2025/07/woman-ice-stalked-at-two-socal-hospitals-is-now-in-federal-custody/>; "Advocates Say Woman in ICE Custody Was Taken From Hospital Where She Was Receiving Care After Arrest," ABC7 Los Angeles, July 19, 2025, <https://abc7.com/post/advocates-say-woman-ice-custody-was-taken-hospital-where-she-receiving-care-arrest/17190888/>.

¹²⁴ *Marin v. Noem*, No. 2:25-cv-09343-CV-SSC, Order Granting Ex Parte Application for Temporary Restraining Order (C.D. Cal. Oct. 4, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.cacd.989081/gov.uscourts.cacd.989081.9.0.pdf>; Lexis-Olivier Ray and Aisha Wallace-Palomares, "Judge Orders ICE To 'Release' Injured Man Held In Hospital For 37 Days Without Charges," L.A. TACO, Oct. 7, 2025, <https://lataco.com/bayron-rovidio-marin-ice>; Alys Martinez, "LA County Man Restrained to Hospital Bed for a Month After Immigration Operation," CBS Los Angeles, Oct. 7, 2025, <https://www.cbsnews.com/losangeles/news/man-restrained-to-hospital-bed-immigration-operation-carson/>.

¹²⁵ Tracee Wilkins, "Inside ICE Enforcement in Maryland," NBC4 Washington, Mar. 19, 2025, <https://www.youtube.com/watch?v=7W89h0G5ccA>.

¹²⁶ Liz Landers and Kyle Midura, "'Deportation Trap': Immigration Agents Arresting Migrants at Mandatory Court Check-ins," PBS News, Nov. 25, 2025, <https://www.pbs.org/newshour/show/deportation-trap-immigration-agents-arresting-migrants-at-mandatory-court-check-ins>; Valerie Gonzalez, Cedar Attanasio, and Sophia Tareen, "Once-routine Immigration Check-ins Become High-stakes Calculation as Some Are Detained," The Associated Press, March 14, 2025, <https://apnews.com/article/immigration-fears-appointments-detained-deported-a6d465c177eb4880699e9c40210508fb>; Jasmine Garsd, "Lawyers Warn Clients of Increased Arrest Risk at Immigration Check-ins," NPR, April 24, 2025, <https://www.npr.org/2025/04/24/nx-s1-5372694/immigration-lawyers-warn-detention-risk>.

¹²⁷ ACLU, "After ICE Admitted Having No Justification for Arrests at Immigration Courthouses, District Court Grants Stay Prohibiting ICE From Conducting Courthouse Arrests," American Civil Liberties Union, May 19, 2026, <https://www.aclu.org/press-releases/after-ice-admitted-having-no-justification-for-arrests-at-immigration-courthouses-district-court-grants-stay-prohibiting-ice-from-conducting-courthouse-arrests>.

¹²⁸ Sam Tabachnik, "Man 'violently' arrested by ICE in Denver courthouse bathroom as young child watched, witness says," The Denver Post, June 20, 2025, <https://www.denverpost.com/2025/06/20/ice-arrest-federal-courthouse-denver-aclu/>.

¹²⁹ Angeline McCall, "Witnesses Watch as Father Detained, Separated from Partner and Son," 9NEWS, June 19, 2025 (updated), <https://www.9news.com/article/news/politics/father-detained-denver-immigration-court/73-60540231-0dd3-4d2f-91c2-c170d71f793b>; "Charges Dropped for Legal Observer Detained at Denver Immigration Court," ACLU of Colorado, Nov. 25, 2025, <https://www.aclu-co.org/press-releases/charges-dropped-for-legal-observer-detained-at-denver-immigration-court/>.

¹³⁰ Michael Gryboski, "Evangelical pastor detained by ICE despite stay of removal, no criminal record," Christian Post, May 27, 2025, <https://www.christianpost.com/news/evangelical-pastor-detained-by-ice-despite-stay-of-removal.html>; Billal Rahman, "Florida Pastor In US For 26 Years Detained By ICE at Immigration Appointment," Newsweek, June 4, 2025, <https://www.newsweek.com/florida-pastor-detained-ice-immigration-appointment-2080717>; Romy Ellenbogen, "Hillsborough pastor deported to Guatemala after weeks in detention," Tampa Bay Times, July 3, 2025, <https://www.tampabay.com/news/2025/07/03/hillsborough-pastor-deported-guatemala-after-weeks-detention/>.

¹³¹ *Hussen v. Noem*, No. 26-CV-00324 (D. Minn. Jan. 15, 2026), <https://www.aclu.org/cases/hussen-v-noem>.

¹³² Claire Galofaro, "Chicago's Children Are Getting Caught in the Chaos of Immigration Crackdowns," ABC7 Chicago, Oct. 28, 2025, <https://abc7chicago.com/post/chicagos-children-are-getting-caught-chaos-immigration->

[crackdowns-tear-gas-thrown-logan-square-funston/18080141/](https://www.nbcchicago.com/news/local/tear-gas-deployed-by-federal-agent-in-chicagos-logan-square-neighborhood/3833507/); Randy Gyllenhaal and NBC Chicago Staff, “Tear gas deployed by federal agent in Chicago’s Logan Square neighborhood,” NBC Chicago, Oct. 3, 2025, <https://www.nbcchicago.com/news/local/tear-gas-deployed-by-federal-agent-in-chicagos-logan-square-neighborhood/3833507/>.

¹³³ Claire Grunewald, “Border Patrol Sweeps Begin in Louisiana’s Capital Region Amid ‘Catahoula Crunch’ Operation,” The Advocate, Dec. 9, 2025, https://www.theadvocate.com/baton_rouge/news/crime_police/border-patrol-detains-people-in-capital-region/article_18d4a3ef-e3d4-4280-b5c5-e8560b752764.html; Louisiana PSL, Instagram reel, Dec. 9, 2025, <https://www.instagram.com/reel/DSDKI59DibE/>; WBRZ Staff, “Video Shows Border Patrol, ICE Beginning Enforcement in the Capital Area,” WBRZ, Dec. 9, 2025, <https://www.wbrz.com/news/video-shows-border-patrol-ice-beginning-enforcement-in-the-capital-area/>.

¹³⁴ Robert Klemko, “The U.S. Citizens Getting Caught in Trump’s Immigration Crackdown,” Washington Post, Dec. 7, 2025, <https://www.washingtonpost.com/immigration/2025/12/07/trump-immigration-citizens-ice-arrests/>.

¹³⁵ Robert Kovacik and Karla Rendon, “Off-Duty Federal Agent Arrested After Pointing Gun at Teen in Temecula,” NBC Los Angeles, Nov. 18, 2025, <https://www.nbclosangeles.com/news/local/off-duty-federal-agent-arrest-temecula/3805911/>; Josh DuBose, “Federal Agent Arrested for Pulling Gun on Southern California Teen, Lawyer Says,” KTLA, Nov. 16, 2025 (updated Jan 15, 2026), <https://ktla.com/news/local-news/ice-agent-arrested-for-pulling-gun-on-southern-california-teen-lawyer-says/>.

¹³⁶ Danielle Prokop, “U.S. Rep Vasquez demands answers over Las Cruces border patrol incident with students,” Source New Mexico, Feb. 24, 2025, <https://sourcenm.com/2025/02/24/u-s-rep-vasquez-demands-answers-over-las-cruces-border-patrol-incident-with-students/>.

¹³⁷ Danielle Prokop, “U.S. Rep Vasquez demands answers over Las Cruces border patrol incident with students,” Source New Mexico, Feb. 24, 2025, <https://sourcenm.com/2025/02/24/u-s-rep-vasquez-demands-answers-over-las-cruces-border-patrol-incident-with-students/>; U.S. Representative Gabe Vasquez, *Letter to Kristi Noem, Secretary of the U.S. Department of Homeland Security*, Feb. 24, 2025, <https://vasquez.house.gov/sites/evo-subsites/vasquez.house.gov/files/evo-media-document/20250224-DHS-LCPS-Bus-Incident.pdf>; United States v. Martinez-Fuerte, 428 U.S. 543 (1976), <https://supreme.justia.com/cases/federal/us/428/543/>; see American Civil Liberties Union of Arizona, *U.S. Border Patrol Interior Checkpoints (FAQ)*, Nov. 19, 2014, https://www.acluaz.org/app/uploads/2016/07/faq_border_patrol_checkpoint.pdf; American Civil Liberties Union of Arizona, *Know Your Rights with Border Patrol*, 2016, https://www.acluaz.org/app/uploads/2016/07/aclu_border_rights.pdf.

¹³⁸ Danielle Prokop, “U.S. Rep Vasquez demands answers over Las Cruces border patrol incident with students,” Source New Mexico, Feb. 24, 2025, <https://sourcenm.com/2025/02/24/u-s-rep-vasquez-demands-answers-over-las-cruces-border-patrol-incident-with-students/>.

¹³⁹ Ashley Rodriguez, “Key West High School student detained, deported,” Keys Citizen, Dec. 11, 2025, https://www.keysnews.com/news/local/key-west-high-school-student-detained-deported/article_2abfddfb-63e6-4fa6-9763-f83625b0a39e.html; Temporary Protected Status Designated Country: Honduras,” U.S. Citizenship and Immigration Services, Feb. 11, 2026, <https://www.uscis.gov/humanitarian/temporary-protected-status/temporary-protected-status-designated-country-honduras>.

¹⁴⁰ Jessie Bowman, “ICE Ramps Up Enforcement in Four Corners,” The Durango Herald, Aug. 19, 2025, <https://www.durangoherald.com/articles/ice-ramps-up-enforcement-in-four-corners/>; Jacqlin Aragon, “Attorney Weighs in on Video of ICE Arrest in Aztec,” KOB, Aug. 21, 2025, <https://www.kob.com/new-mexico/four-corners/new-mexico-attorney-weighs-in-on-shocking-arrest-video>; Colorado Rapid Response Network - Immigration, Aug. 18, 2025, <https://www.facebook.com/CORapidResponseNetwork/posts/pfbid02zdJDfmWHjvzXWeq7us6MdGKXoQ6StfYzeSF2TzPxtmTzLq1UHm4a92f682FVVfyJl?rddid=vT8qVSfEGAiuEKtM#>.

¹⁴¹ Clark Adomaitis, “Durango family detained by ICE asks to return to Colombia,” Four Corners Public Radio, Nov. 21, 2025, <https://www.ksut.org/news/2025-11-21/durango-family-detained-by-ice-asks-to-return-to-colombia>; Christian Burney, “Family seeking asylum in Durango reunites in Colombia,” Durango Herald, Jan. 16, 2026, <https://www.durangoherald.com/articles/family-seeking-asylum-in-durango-reunites-in-colombia/>.

¹⁴² Christian De La Rosa, “A Month After Coral Springs Man’s Arrest by ICE, Family Members Await Answers,” Local 10 News, Mar. 11, 2025, <https://www.local10.com/news/local/2025/03/11/a-month-after-coral-springs-mans-arrest-by-ice-family-members-await-answers/>; Christian De La Rosa, “UPDATE: Heavily Armed ICE Agents Take Coral Springs Man Into Custody,” Feb. 6, 2025, https://www.instagram.com/reel/DFv8B_oyPqn/.

¹⁴³ Dara Kerr, “Federal Agents Blast Way Into California Home of Woman and Small Children,” The Guardian, June 27, 2025, <https://www.theguardian.com/us-news/2025/jun/27/california-home-raid-huntington-park>; Alex Rozier and Jonathan Lloyd, “Charges Dismissed Against Man Arrested After Federal Agents Blew Door Off

Huntington Park Home,” NBC Los Angeles, July 24, 2025, <https://www.nbclosangeles.com/news/local/huntington-park-raid-immigration-explosion/3752904/>.

¹⁴⁴ Shelby Bremer, “Federal Agents Broke Windows, Handcuffed Teens in Oceanside Immigration Operation,” NBC 7 San Diego, June 24, 2025, <https://www.nbcsandiego.com/news/local/federal-agents-broke-windows-handcuffed-teens-in-oceanside-immigration-operation/3855483/>; Tania Thorne, “Oceanside Neighborhood on High Alert After Family Detained by Armed ICE Agents,” KPBS, June 27, 2025, <https://www.kpbs.org/news/racial-justice-social-equity/2025/06/27/oceanside-neighborhood-on-high-alert-after-family-detained-by-armed-ice-agents>.

¹⁴⁵ Laura Rodríguez Presa, Rebecca Johnson, and Gregory Royal Pratt, “Latino US Citizens Racially Profiled by Federal Immigration Agents in Chicago: ‘I Felt Like a Piece of Trash,’” Chicago Tribune, Nov. 15, 2025, <https://www.chicagotribune.com/2025/11/15/latino-us-citizens-racially-profiled-immigration-chicago/>.

¹⁴⁶ *Id.*

¹⁴⁷ Joe Rivano Barros, “ICE Arrests Man S.F. Judge Says Might Be Mentally Impaired,” Mission Local, July 24, 2025, <https://missionlocal.org/2025/07/ice-arrests-s-f-courthouse-mentally-impaired/>.

¹⁴⁸ Nina Shapiro, “Man with physical, developmental disabilities in WA ICE detention,” Seattle Times, Aug. 25, 2025, <https://www.seattletimes.com/seattle-news/law-justice/man-with-physical-developmental-disabilities-in-wa-ice-detention/>; Katie DeBenedetti, “Teen Arrested in ICE Raid at an Oakland Home Detained Out of State, Attorney Says,” KQED, Aug. 15, 2025 (updated), <https://www.kqed.org/news/12052198/teen-arrested-in-ice-raid-at-an-oakland-home-detained-out-of-state-attorney-says>.

¹⁴⁹ G.Z.T. v. Smith, No. 25 C 12802 (N.D. Ill. Oct. 21, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.488367/gov.uscourts.ilnd.488367.14.0.pdf>; Mel Leonor Barclay and Shefali Luthra, “Her Baby was in the NICU. She was in ICE Detention,” The 19th, Dec. 2, 2025, <https://19thnews.org/2025/12/postpartum-immigrant-detention-ice/>.

¹⁵⁰ “ICE Deports 3 U.S. Citizen Children Held Incommunicado Prior to the Deportation,” American Civil Liberties Union, Apr. 25, 2025, <https://www.aclu.org/press-releases/ice-deports-3-u-s-citizen-children-held-incommunicado-prior-to-the-deportation>; V.V. v. Acuna, No. 3:25-cv-00669 (E.D. La.), <https://www.courtlistener.com/docket/70980715/v-v-acuna/>; V.M.L. v. Harper, No. 2:25-cv-00836 (E.D. La.), <https://www.courtlistener.com/docket/69940863/v-m-l-v-harper/>; Gisela Salomon, “ICE deports immigrant mother of an infant and 3 children who are US citizens, lawyers say,” The Associated Press, Apr. 26, 2025, <https://apnews.com/article/d8c5c0353c18e9ee0c228ea15e02d759>.

¹⁵¹ Mario Fuentes and Dave Sherwood, “Cuban mother’s case fuels concerns over children caught in Trump deportation push,” Reuters, Apr. 29, 2025 (updated), <https://www.reuters.com/world/americas/deported-cuban-mother-separated-breastfeeding-1-year-old-daughter-2025-04-29/>; Nancy Guan, “She was deported to Cuba, and wonders when she’ll see her 1-year-old daughter and husband again,” WUSF, Apr. 28, 2025, <https://www.wlrn.org/immigration/2025-04-28/cuba-deportation-1-year-old-daughter-and-husband-again>; “Tampa Mother Torn from Family; Rep. Kathy Castor Urges Swift Action to Reunite,” Rep. Kathy Castor, Apr. 28, 2025, <https://castor.house.gov/news/documentsingle.aspx?DocumentID=404899>.

Andrea Rodríguez and Milexsy Durán, “Cuban mother deported from US pleads with Trump to reunite with her family,” The Associated Press, May 7, 2025, <https://apnews.com/article/cuba-us-deportee-trump-6024249bffb1fdacafc63c4577977298>.

¹⁵² Kori Skillman, “Indiscriminate ICE arrests have left Baltimore’s immigrant communities in a constant state of fear and anxiety,” Baltimore Beat, Oct. 7, 2025, Nov. 17, 2025 (updated), <https://baltimorebeat.com/indiscriminate-ice-arrests-have-left-baltimores-immigrant-communities-in-a-constant-state-of-fear-and-anxiety/>.

¹⁵³ Raya Torres, “UPDATE: Guatemalan woman reunited with newborn after being detained by Border Patrol,” KOLD, May 3, 2025 (updated), <https://www.kold.com/2025/05/03/guatemalan-woman-gives-birth-tucson-hospital-after-being-detained-by-border-patrol/>; Emily Bregel, “Border Agents Posted at Tucson Maternity Ward to Quickly Deport Migrant Mom,”

May 22, 2025 (updated), https://tucson.com/news/local/border/article_b024b264-ab3a-4ab9-b39b-cb2a2ff5e7a7.html; Paul Ingram, “Migrant woman who gave birth at Tucson hospital released by CBP Saturday,” Tucson Sentinel, May 3, 2025,

https://www.tucsonsentinel.com/local/report/050325_migrant_mother_released/migrant-woman-who-gave-birth-tucson-hospital-released-by-cbp-saturday/; “Guatemalan mother heads for asylum hearing in Tennessee after reprieve from deportation in Arizona,” 12News, May 5, 2025, <https://www.12news.com/article/news/regional/the-border/guatemalan-mother-heads-for-asylum-hearing-in-tennessee-after-reprieve-from-deportation-in-arizona/75-9f360011-2c91-46f7-8c0d-902f5644c6ba>.

¹⁵⁴ Bobbi-Jeanne Misick, “After killings in Minneapolis, Rep. Carter calls for end of ICE ‘as we know it,’” Verite News New Orleans, Jan. 26, 2026, <https://veritenews.org/2026/01/26/troy-carter-abolish-ice-catahoula-crunch/>.

¹⁵⁵ Ben Brown, “ICE arrests Arizona man with legal work permit and active parole status,” ABC15 Arizona, Feb. 28, 2025, <https://www.abc15.com/news/state/ice-arrests-arizona-man-with-legal-work-permit-and-active-parole-status>.

¹⁵⁶ Sol Amaya, “‘Mom is home again with you’: Marine veteran’s wife reunites with children after months in ICE detention,” CNN, Aug. 5, 2025, <https://edition.cnn.com/2025/08/05/americas/mother-released-ice-detention-marine-veteran-intl-latam>;

Sol Amaya, “ICE detained a mother who was still breastfeeding. Her Marine veteran husband fights for her freedom,” CNN, July 5, 2025,

<https://edition.cnn.com/2025/07/05/us/mother-detained-marine-veteran-husband>; CBS News, “ICE detained a Marine veteran’s wife. He doesn’t know how to tell their children where she went,” June 25, 2025 (updated), <https://www.cbsnews.com/news/ice-detains-marine-corps-veteran-wife/>; Jillian Frankel, “Arrested While Still Breastfeeding, Marine Veteran’s Wife Is Now Free amid Immigration Case,” People, July 29, 2025, <https://people.com/wife-of-marine-veteran-released-recognizance-after-2-months-of-ice-detention-11778841>.

¹⁵⁷ Alexis Dominguez, “ICE Detains Phoenix Mom with DACA Status while Shopping on Christmas Eve,” Arizona’s Family, Dec. 30, 2025, <https://www.azfamily.com/2025/12/31/ice-detains-phoenix-mom-with-daca-status-while-shopping-christmas-eve/>; Joe Dana, “Arizona Congresswoman: DACA Recipient Unlawfully Arrested Christmas Eve,” 12News, Dec. 31, 2025 (updated), <https://www.12news.com/article/news/local/valley/az-congresswoman-daca-recipient-unlawfully-arrested-christmas-eve-arizona-immigration/75-4a6a2979-5189-4c2b-a06c-5ed16e33cab2>.

¹⁵⁸ Alexandra Rangel, “DACA recipient detained by Yuma border patrol raising questions about protections,” Arizona’s Family, Aug. 11, 2025, <https://www.azfamily.com/2025/08/12/daca-recipient-detained-by-yuma-border-patrol-raising-questions-about-protections/>; Alexandra Rangel, “Does DACA protect recipients from deportation? The feds weigh in,” Arizona’s Family, Aug. 15, 2025, <https://www.azfamily.com/2025/08/16/does-daca-protect-recipients-deportation-feds-weigh/>; Victor Calderón, “Yuma DACA recipient detained by U.S. Customs and Border Protection,” KAWC, Aug. 12, 2025, <https://www.kawc.org/news/2025-08-12/yuma-daca-recipient-detained-by-u-s-customs-and-border-protection>.

¹⁵⁹ Rachel Tuchman, “LGBT Detainees Remain in Harm’s Way Despite Government Guidance,” *American Civil Liberties Union*, July 15, 2015, <https://www.aclu.org/news/immigrants-rights/lgbt-detainees-remain-harms-way-despite>; Guadalupe Marquez-Velarde et al., “Transgender in Detention: Victimization Experiences in Immigration Facilities,” *Transgender Health* 9, no. 6 (2024): 591–600. <https://doi.org/10.1089/trgh.2022.0083>.

¹⁶⁰ Blair Sabol, “Lawyers working to release undocumented Maryland transgender woman being held in all-male ICE facility,” WMAR-2 News, Feb. 20, 2025, <https://www.wmar2news.com/local/lawyers-working-to-release-undocumented-maryland-transgender-woman-being-held-in-all-male-ice-facility>; John-John Williams IV, “Why the White House posted about an undocumented trans woman from Maryland,” The Baltimore Banner, Feb. 20, 2025, <https://www.thebanner.com/national/undocumented-trans-woman-white-house-tweet-M5ILP6VCENGFB36AW37CMAVZI/>; Jeremy Browning, “Testimony on behalf of the Maryland Commission on LGBTQIA+ Affairs,” Maryland Commission on LGBTQIA+ Affairs, Feb. 25, 2025, https://mgaleg.maryland.gov/cmte_testimony/2025/jud/27499_02262025_85748-736.pdf.

¹⁶¹ Kat Stromquist, “ICE officer used ‘ruse’ tactics during arrest of Louisiana immigrant, ACLU says,” WWNO, Feb. 18, 2025, <https://www.wwno.org/wwno/2025-02-18/ice-officer-used-ruse-tactics-during-arrest-of-louisiana-immigrant-aclu-says>; Levi Kalish, “ICE Is Treating Trans Immigrants With A New Level Of Cruelty,” HuffPost, Feb. 7, 2026 (updated), https://www.huffpost.com/entry/trump-ice-trans-immigrants-medical-neglect_n_69851c88e4b06f7f7bb7cdbc; Westley v. Harper, No. 2:25-cv-00324 (E.D. La. Feb. 1, 2025), <https://www.courtlistener.com/docket/69603204/westley-v-harper/>.

¹⁶² Levi Kalish, “ICE Is Treating Trans Immigrants With A New Level Of Cruelty,” HuffPost, Feb. 7, 2026 (updated), https://www.huffpost.com/entry/trump-ice-trans-immigrants-medical-neglect_n_69851c88e4b06f7f7bb7cdbc.

¹⁶³ Mike Hellgren, “Maryland mother released from ICE detention, still faces battle to prove U.S. citizenship,” CBS News, Jan. 9, 2026, <https://www.cbsnews.com/baltimore/news/maryland-ice-detention-dulce-diaz-morales-released-citizenship/>; Matt Shuham and Dirce Toca, “ICE Says U.S. Citizen’s Birth Certificate Is Fake After Arresting Her: Attorneys,” HuffPost, Dec. 18, 2025 (updated), https://www.huffpost.com/entry/us-citizen-arrested-by-ice_n_693c9355e4b018dc36f254c0.

¹⁶⁴ Mike Hellgren, “Maryland mother released from ICE detention, still faces battle to prove U.S. citizenship,” CBS News, Jan. 9, 2026,

<https://www.cbsnews.com/baltimore/news/maryland-ice-detention-dulce-diaz-morales-released-citizenship/>; Breana Ross, “DHS says a Maryland mother in ICE custody isn’t a US citizen. Her lawyers say that’s false,” WBAL TV, Dec. 23, 2025 (updated), <https://www.wbal.com/article/dhs-maryland-mother-ice-custody-not-citizen-lawyers-false/69853502>; Matt Shuham and Dirce Toca, “ICE Says U.S. Citizen’s Birth Certificate Is Fake After Arresting Her: Attorneys,” HuffPost, Dec. 18, 2025 (updated), https://www.huffpost.com/entry/us-citizen-arrested-by-ice_n_693c9355e4b018dc36f254c0.

¹⁶⁵ Joe Heim, “After 25 days, ICE releases Maryland woman who says she is a U.S. citizen,” Washington Post, Jan. 7, 2026, <https://www.washingtonpost.com/dc-md-va/2026/01/07/diaz-morales-maryland-woman-released-ice/>.

¹⁶⁶ Diaz Morales v. Baker, No.1:25-cv-04151(D. Maryland Dec. 16, 2025), <https://www.courtlistener.com/docket/72046028/diaz-morales-v-baker/>.

¹⁶⁷ Mike Hellgren, “Maryland mom now wearing ankle monitor, fighting to prove U.S. citizenship after ICE deportation threat,” CBS News, Jan. 18, 2026 (updated), <https://www.cbsnews.com/baltimore/news/maryland-mom-ice-deportation-dulce-consuelo-diaz-morales-u-s-citizenship/>; Matt Shuham and Dirce Toca, “ICE Says U.S. Citizen’s Birth Certificate Is Fake After Arresting Her: Attorneys,” HuffPost, Dec. 18, 2025 (updated), https://www.huffpost.com/entry/us-citizen-arrested-by-ice_n_693c9355e4b018dc36f254c0.

¹⁶⁸ Mike Hellgren, “Maryland mom now wearing ankle monitor, fighting to prove U.S. citizenship after ICE deportation threat,” CBS News, Jan. 18, 2026 (updated), <https://www.cbsnews.com/baltimore/news/maryland-mom-ice-deportation-dulce-consuelo-diaz-morales-u-s-citizenship/>.

¹⁶⁹ Mike Hellgren, “Maryland mom now wearing ankle monitor, fighting to prove U.S. citizenship after ICE deportation threat,” CBS News, Jan. 18, 2026 (updated), <https://www.cbsnews.com/baltimore/news/maryland-mom-ice-deportation-dulce-consuelo-diaz-morales-u-s-citizenship/>.

¹⁷⁰ Joe Heim, “After 25 days, ICE releases Maryland woman who says she is a U.S. citizen,” Washington Post, Jan. 7, 2026, <https://www.washingtonpost.com/dc-md-va/2026/01/07/diaz-morales-maryland-woman-released-ice/>.

¹⁷¹ Joe Heim, “After 25 days, ICE releases Maryland woman who says she is a U.S. citizen,” Washington Post, Jan. 7, 2026, <https://www.washingtonpost.com/dc-md-va/2026/01/07/diaz-morales-maryland-woman-released-ice/>.

¹⁷² Joe Heim, “Woman held by ICE for 25 days, despite evidence of citizenship, gets a U.S. passport,” Washington Post, June 2, 2026, <https://www.washingtonpost.com/dc-md-va/2026/06/02/woman-held-by-ice-25-days-despite-us-citizenship-claim-gets-passport/>; see Mike Hellgren, “Maryland mom now wearing ankle monitor, fighting to prove U.S. citizenship after ICE deportation threat,” CBS News, Jan. 18, 2026 (updated), <https://www.cbsnews.com/baltimore/news/maryland-mom-ice-deportation-dulce-consuelo-diaz-morales-u-s-citizenship/>.

¹⁷³ Joe Heim, “Woman held by ICE for 25 days, despite evidence of citizenship, gets a U.S. passport,” Washington Post, June 2, 2026, <https://www.washingtonpost.com/dc-md-va/2026/06/02/woman-held-by-ice-25-days-despite-us-citizenship-claim-gets-passport/>.

¹⁷⁴ Joe Heim, “After 25 days, ICE releases Maryland woman who says she is a U.S. citizen,” Washington Post, Jan. 7, 2026, <https://www.washingtonpost.com/dc-md-va/2026/01/07/diaz-morales-maryland-woman-released-ice/>.

¹⁷⁵ Ellessandra Taormino and Sam LaFrance, “Recording Law Enforcement Is a First Amendment Right,” American Civil Liberties Union, May 18, 2026, <https://www.aclu.org/news/free-speech/recording-law-enforcement-is-a-first-amendment-right>; Fox News, “Law Enforcement Needs to Be ‘Proactive’ and Work Together, CBP Commissioner Says,” Jan. 26, 2026, <https://www.foxnews.com/video/6388302271112>.

¹⁷⁶ See Los Angeles Press Club v. Noem, No. 2:25-cv-05563 (C.D. Cal.); Chicago Headline Club v. Noem, No. 25-3023 (7th Cir.); Tinch v. Noem, No. 0:25-cv-04669 (D. Minn.); Demster v. Blanche, No. 2:26-cv-02546 (W.D. Tenn.) (documenting violent force by federal law enforcement against peaceful protestors, people recording law enforcement actions, people engaged in prayer, journalists gathering the news, and other community members).

¹⁷⁷ Ranking Member Richard Blumenthal, Permanent Subcommittee on Investigations, Minority Staff Report, “Unchecked Authority: Examining the Trump Administration’s Extrajudicial Immigration Detentions of U.S. Citizens,” United States Senate, Dec. 9, 2025, https://www.hsgac.senate.gov/wp-content/uploads/2025.12.8_ICE-Report-revised-FINAL.pdf; Julia Marnin, “Pregnant US Citizen Arrested by ICE Went Into Labor Prematurely in CA, Claim Says,” The Sacramento Bee, Aug. 26, 2025, <https://www.sacbee.com/news/california/article311854422.html>.

¹⁷⁸ David J. Bier, “The Government Unconstitutionally Labels ICE Observers as Domestic Terrorists,” Cato Institute (blog), Dec. 15, 2025, <https://www.cato.org/blog/dhs-policy-threatening-arresting-ice-observers-violates-their-rights>; Unión Migrante, “Nuestros vecinos nos aman! No hay ningún lado donde puedan ir los vampiros que nuestros vecinos no saldrán a vigilar y exponerlo al sol de la vista pública!,” Dec. 10, 2025, <https://www.facebook.com/reel/2246448949173486>; WWLTV, “ICE Detains 4 People at Gretna Home Depot,” Nov. 26, 2025, <https://www.youtube.com/watch?v=msiqOoUbcsc>.

¹⁷⁹ Morgan Music, “Federal Officer Jumps Out of Vehicle to Point a Gun at Man Taking Picture of His License Plate,” *Latin Times*, June 20, 2025, <https://www.latintimes.com/federal-officer-jumps-out-vehicle-point-gun-man-taking-picture-his-license-plate-585360>; Leslie Berestein Rojas, “California Bill Would Require Law Enforcement and Federal Agents to Show ID,” *LAist*, June 23, 2025, <https://laist.com/news/politics/california-bill-would-require-law-enforcement-and-federal-agents-to-show-id>.

¹⁸⁰ Leslie Berestein Rojas, “California Bill Would Require Law Enforcement and Federal Agents to Show ID,” *LAist*, June 23, 2025, <https://laist.com/news/politics/california-bill-would-require-law-enforcement-and-federal-agents-to-show-id>.

¹⁸¹ Sam Levin, “California Police Intervene as ICE Agent in Plain Clothes Points Gun at Woman,” *The Guardian*, Nov. 11, 2025, <https://www.theguardian.com/us-news/2025/nov/11/california-police-intervene-ice-agent>; Austin Turner, “Fullerton Police Says ICE Agent Pointed Gun at Woman Although ‘No Crime Had Occurred,’” *CBS News Los Angeles*, Nov. 10, 2025, <https://www.cbsnews.com/losangeles/news/fullerton-police-ice-agent-pointed-gun/>.

¹⁸² Bellingcat, “‘Pattern of Extreme Brutality’: Tear Gas, Pepper Balls Among Weapons Deployed Against Protesters in Illinois,” Oct. 31, 2025, <https://www.bellingcat.com/news/2025/10/31/illinois-immigration-protests/>.

¹⁸³ Bellingcat, “‘Pattern of Extreme Brutality’: Tear Gas, Pepper Balls Among Weapons Deployed Against Protesters in Illinois,” Oct. 31, 2025, <https://www.bellingcat.com/news/2025/10/31/illinois-immigration-protests/>; Dan Gooding, “ICE Agent Points Gun at Pregnant Woman During Arrest,” *Newsweek*, Oct. 23, 2025, <https://www.newsweek.com/ice-agent-pregnant-woman-firearm-illinois-10922067>; Jennifer Mascia, “How Many People Have Been Shot in ICE Raids?,” *The Trace*, Dec. 8, 2025, May 4, 2026 (updated), <https://www.thetrace.org/2025/12/immigration-ice-shootings-guns-tracker/>.

¹⁸⁴ Emma Pilger, “County Commissioner Confronted by Federal Agents Amid Increased ICE Activity in Steamboat Springs, Oak Creek,” *Denver Post*, Sept. 25, 2025, <https://www.denverpost.com/2025/09/25/ice-enforcement-steamboat-springs-routt-county-commissioner/>; Bennito L. Kely, “Latina County Commissioner Reports Aggressive [sic] ICE Activity Near Steamboat Springs,” *Westword*, Sept. 30, 2025, <https://www.westword.com/news/latina-county-commissioner-reports-aggressive-ice-activity-near-steamboat-springs-40787427/>; Angelica Salinas, <https://www.facebook.com/reel/803941298663762>.

¹⁸⁵ Darcy Spencer, “Montgomery County Council Member Captures ICE Detainment in Prince George’s,” *NBC Washington*, Nov. 12, 2025, <https://www.nbcwashington.com/news/local/montgomery-county-council-member-captures-ice-detainment-in-prince-georges/4015393/>.

¹⁸⁶ Tracy Lehr, “Oxnard Man Released After Being Detained by ICE Agents While Filming Father’s Arrest,” *News Channel 3-12*, June 17, 2025, <https://keyt.com/news/ventura-county/2025/06/17/u-s-citizen-held-by-ice-released/>.

¹⁸⁷ Nicole Foy and McKenzie Funk, “We Found More Than 40 Cases of Immigration Agents Using Banned Chokeholds and Other Moves That Can Cut Off Breathing,” *ProPublica*, Jan. 13, 2026, <https://www.propublica.org/article/videos-ice-dhs-immigration-agents-using-chokeholds-citizens>; Tulsi Kamath and Jeff Arnold, “Feds Deploy Apparent Tear Gas in Chicago Chase after Activists Block Agents,” *NewsNation*, Oct. 6, 2025 (updated), <https://www.newsnationnow.com/us-news/immigration/feds-tear-gas-chicago-chase>; *NewsNation*, “Watch: Federal Agents Slam Man to Ground, Tell Woman ‘You’re Next,’” Oct. 5, 2025, <https://www.youtube.com/shorts/51miOmd1qUM>.

¹⁸⁸ Olivia Prentzel, “Hundreds Protest Outside ICE Building in Durango After 2 Children, Father Detained,” *The Colorado Sun*, Oct. 28, 2025, <https://coloradosun.com/2025/10/28/protest-ice-detain-two-children-father-durango/>; Bennito L. Kely, “Masked Officer Throws Protester Down Hill Outside of Colorado ICE Facility,” *Westword*, Oct. 28, 2025, <https://www.westword.com/news/masked-officer-throws-hurts-woman-colorado-ice-facility-40798245/>; Colorado Bureau of Investigation, “CBI to Investigate ICE Demonstration Incident in Durango,” Oct. 31, 2025, <https://cbi.colorado.gov/news-article/cbi-to-investigate-ice-demonstration-incident-in-durango>.

¹⁸⁹ Jasper Ward, “Colorado prosecutor charges border officer with assault,” April 22, 2026, *Reuters*, <https://www.reuters.com/legal/government/colorado-prosecutor-charges-border-officer-with-assault-2026-04-22/>; Jack Healy, “Immigration Agent Is Charged With Assaulting a Protester,” April 21, 2026, *The New York Times*, <https://www.nytimes.com/2026/04/21/us/durango-colorado-immigration-officer-charged-assault.html>.

¹⁹⁰ Ford Fischer, X post, Sept. 19, 2025, <https://x.com/fordfischer/status/1969150886422155594>; Nicole Sganga, Madeleine May, Layla Ferris, and Maddie Kornfeld, “We Asked a Former Federal Agent to Review Videos Showing Use of Force Against Protesters. Here’s What He Found,” *CBS News*, Nov. 11, 2025, <https://www.cbsnews.com/news/former-federal-agent-ice-use-of-force-against-protesters/>.

¹⁹¹ *Id.*

¹⁹² Dave Decker Declaration, *Chicago Headline Club v. Noem*, No. 1:25-cv-12173, Doc. 22-23 (N.D. Ill. Oct. 6, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.22.23.pdf>.

¹⁹³ Aisha Wallace-Palomares and Izzy Ramirez, “EXCLUSIVE: Dash Cam Footage Shows ICE Vehicle Rear-

- Ending Community Observer In Oxnard,” L.A. TACO, Oct. 20, 2025, <https://lataco.com/oxnard-dash-cam-ice-crash/>; Sid Garcia and Amy Powell, “Immigration rights activist says federal agent rammed his truck in Oxnard,” ABC7 Los Angeles, Oct. 17, 2025, <https://abc7.com/post/dhs-vehicle-reportedly-rams-truck-takes-us-citizen-custody-sparking-protest-oxnard/18021400/>; Rachel Uranga and Andrea Castillo, “Activist says video shows ICE rammed his truck. ICE says the opposite,” Los Angeles Times, Oct. 16, 2025, <https://www.latimes.com/california/story/2025-10-16/agents-accuse-activists-of-slamming-into-their-vehicle>.
- Federal authorities have escalated a criminal investigation of community observer Leonardo Espartaco Martinez, the associated organization VC Defensa, and other individuals connected to the group. Ryan P. Cruz, “Central Coast Immigrant Rights Orgs Respond to Federal Raids,” Santa Barbara Independent, May 19, 2026, <https://www.independent.com/2026/05/19/central-coast-immigrant-rights-orgs-respond-to-federal-raids/>; Aisha Wallace-Palomares and Izzy Ramirez, “Legal Coalition Prepares Restraining Orders Against Feds Who Targeted VC Defensa,” L.A. Taco, May 16, 2026, <https://lataco.com/vc-defensa-legal-coalition-restraining-order>.
- ¹⁹⁴ Nicole Sganga, Madeleine May, Layla Ferris, and Maddie Kornfeld, “We Asked a Former Federal Agent to Review Videos Showing Use of Force Against Protesters. Here’s What He Found,” CBS News, Nov. 11, 2025, <https://www.cbsnews.com/news/former-federal-agent-ice-use-of-force-against-protesters/>.
- ¹⁹⁵ Joe Rivano Barros, “Video: ICE Agents Drive SUV Through Protesters at S.F. Immigration Court,” Mission Local, July 10, 2025 (updated), <https://missionlocal.org/2025/07/video-ice-agents-brandish-rifles-drive-through-protesters-at-s-f-immigration-court/>.
- ¹⁹⁶ ACLU of Illinois, “ACLU of Illinois Responds to DHS Claims That it Will Prosecute People for Recording ICE Officers on Our Streets,” Sept. 9, 2025, <https://www.aclu-il.org/en/press-releases/aclu-illinois-responds-dhs-claims-it-will-prosecute-people-recording-ice-officers-our>.
- ¹⁹⁷ Smith v. City of Cumming, 212 F.3d 1332, 1333 (11th Cir. 2000); see also Fields v. City of Philadelphia, 862 F.3d 353, 358–59 (3d Cir. 2017); Turner v. Lieutenant Driver, 848 F.3d 678, 688 (5th Cir. 2017); Glik v. Cunniffe, 655 F.3d 78, 82 (1st Cir. 2011); ACLU of Ill. v. Alvarez, 679 F.3d 583, 600 (7th Cir. 2012); Fordyce v. City of Seattle, 55 F.3d 436, 438–39 (9th Cir. 1995).
- ¹⁹⁸ See Sharpe v. Winterville Police Dep’t, 59 F.4th 674, 681 (4th Cir. 2023); Fields v. City of Phila., 862 F.3d 353, 358–59 (3d Cir. 2017); Glik v. Cunniffe, 655 F.3d 78, 82 (1st Cir. 2011).
- ¹⁹⁹ Khoury v. Miami-Dade Cnty. Sch. Bd., 4 F.4th 1118, 1122, 1129 (11th Cir. 2021); Toole v. City of Atlanta, 798 F. App’x 381, 383, 388 (11th Cir. 2019).
- ²⁰⁰ U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, Case: 1:25-cv-12173 Document #: 338-12 (7th Circuit), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.12.pdf>.
- ²⁰¹ U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, Case: 1:25-cv-12173 Document #: 338-46 (7th Circuit), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.46.pdf>.
- ²⁰² U.S. Customs and Border Protection, “Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Report,” Chicago Headline Club v. Noem, Case: 1:25-cv-12173 Document #: 338-8 (7th Circuit), <https://storage.courtlistener.com/recap/gov.uscourts.ilnd.487571/gov.uscourts.ilnd.487571.338.8.pdf>. The report refers to the deployment of Oleoresin Capsicum (OC) spray, which is commonly known as “pepper spray.”
- ²⁰³ Evelyn Holmes, Maher Kawash, and ABC7 Chicago Digital Team, “Federal Agents Arrest 3 U.S. Citizens After Crash During Immigration Operation in Evanston,” ABC7 Chicago, Nov. 1, 2025, <https://abc7chicago.com/post/ice-evanston-today-news-cook-county-officials-speak-federal-immigration-agents-reportedly-area-halloween/18095995/>.
- ²⁰⁴ Ramon Antonio Vargas, “US Citizen Chased by Federal Agents in New Orleans Says She Was Targeted Because ‘I’m Brown,’” The Guardian, Dec. 5, 2025, <https://www.theguardian.com/us-news/2025/dec/05/us-citizen-chased-ice-agents-new-orleans>;
- ²⁰⁵ Laura Rodríguez Presa, Rebecca Johnson, Gregory Royal Pratt, “Latino US Citizens Racially Profiled by Federal Immigration Agents in Chicago: ‘I Felt Like a Piece of Trash,’” Chicago Tribune, Nov. 15, 2025, <https://www.chicagotribune.com/2025/11/15/latino-us-citizens-racially-profiled-immigration-chicago/>.
- ²⁰⁶ *Id.*
- ²⁰⁷ Bobby Pen, “The target is shifting: New data reveals Black immigrants bear the brunt of aggressive new ‘street arrest’ tactics,” The Grio, April 11, 2026, <https://thegrio.com/2026/04/11/black-immigrants-deportation-disparities/>.
- ²⁰⁸ Brenda Norrell, “ICE Terrorizing Navajo, Yaqui, and Shawnee in Arizona and Oklahoma,” Censored News, Jan. 16, 2026, <https://bsnorrell.blogspot.com/2026/01/ice-terrorizing-navajo-yaqui-and.html>; Indigenous Alliance Without Borders, Facebook reel, <https://www.facebook.com/reel/918040133985667>.
- ²⁰⁹ Testimony of Deborah Fleischaker, Illinois Accountability Commission Second Hearing, Jan. 30, 2026 (on file

with ACLU).

²¹⁰ Jason Houser, “I Worked for ICE and CBP. Our Current System Makes Everyone Less Safe,” USA TODAY, Jan. 14, 2026, <https://www.usatoday.com/story/opinion/voices/2026/01/13/ice-minnesota-immigration-enforcement-political-signaling/88146795007/>.

²¹¹ Sam Levin, “ICE Agents Reveal Daily Arrest Quotas and Surveillance App in Rare Court Testimony,” The Guardian, March 13, 2026, <https://www.theguardian.com/us-news/2026/mar/13/ice-agent-court-testimony-oregon>; Hamed Aleaziz and Todd Heisler, “Under Pressure From the White House, ICE Seeks New Ways to Ramp up Arrests,” The New York Times, June 14, 2025, <https://www.nytimes.com/2025/06/11/us/politics/ice-la-protest-arrests.html>; Gloria Oladipo, “Two Senior Ice Officials Reassigned Over Slow Rate of Deportations and Arrests,” The Guardian, Sept. 25, 2025, <https://www.theguardian.com/us-news/2025/sep/25/ice-officials-reassigned-deportation>; Immigration Policy Tracking Project, “Reported: Trump administration officials direct ICE to increase arrests to meet daily quotas,” <https://immpolicytracking.org/policies/report-ice-directed-to-increase-arrests-to-meet-daily-quotas>.

²¹² Hamed Aleaziz and Nicholas Nehamas, “Under Trump, a Shift Toward ‘Absolute Immunity’ for ICE,” The New York Times, January 15, 2026, <https://www.nytimes.com/2026/01/15/us/politics/trump-ice-immunity.html>.

²¹³ Jonah E. Bromwich, “Trump Officials’ Use of ‘Domestic Terrorist’ in Minnesota Shootings Doesn’t Match Legal Reality,” The New York Times, January 28, 2026, <https://www.nytimes.com/2026/01/28/us/trump-minnesota-protesters-domestic-terrorists.html>.

²¹⁴ Written Statement to the Record by Government Accountability Project for March 3, 2026 Senate Committee on the Judiciary Hearing on Oversight of the Department of Homeland Security, March 10, 2026, [03.10.26-GAP-CRCL-Written-Statement-for-the-Record-SJC-DHS-Oversight-Hearing.pdf](https://www.gap-inc.org/wp-content/uploads/2026/03/10-26-GAP-CRCL-Written-Statement-for-the-Record-SJC-DHS-Oversight-Hearing.pdf).

²¹⁵ See Homeland Security Act of 2002, Public Law 107–296, 107th Cong., 2nd sess. (Nov. 25, 2002), <https://www.dhs.gov/homeland-security-act-2002>.

²¹⁶ See Homeland Security Civil Rights and Civil Liberties Protection Act of 2004, Public Law 108–458, 108th Cong., 2nd sess. (December 17, 2004); codified as 6 U.S.C. § 111(b)(1)(G).

²¹⁷ Juan Cuéllar Torres, Sr. Tracey Horan, and Adam Isacson, *Denouncing Into the Void: The Dismantling of Internal Oversight and Accountability at DHS*, Kino Border Initiative and Washington Office on Latin America, March 2026, https://www.wola.org/wp-content/uploads/2026/03/denouncing_into_the_void-3.pdf.

²¹⁸ *Id.*

²¹⁹ “Two Protected Whistleblower Disclosures Concerning the Dissolution of DHS’s Office for Civil Rights and Civil Liberties,” Government Accountability Project, May 15, 2025, <https://whistleblower.org/wpcontent/uploads/2025/05/05-15-2025-GovAcctProj-Whistleblower-Disclosures-to-Congress-re-CRCL.pdf>.

²²⁰ Zolan Kanno-Youngs et al., “Trump Shuts Down 3 Watchdog Agencies Overseeing Immigration Crackdown,” U.S., The New York Times, March 21, 2025, <https://www.nytimes.com/2025/03/21/us/politics/trump-civilrights-homeland-security-deportations.html>.

²²¹ Juan Cuéllar Torres, Sr. Tracey Horan, and Adam Isacson, *Denouncing Into the Void: The Dismantling of Internal Oversight and Accountability at DHS*, Kino Border Initiative and Washington Office on Latin America, March 2026, https://www.wola.org/wp-content/uploads/2026/03/denouncing_into_the_void-3.pdf.

²²² Congressional Research Service, “Oversight of the Use of Force by Department of Homeland Security (DHS) Law Enforcement Officers,” Feb. 2, 2026, https://www.everycrsreport.com/files/2026-02-02_IN12646_824b7d01db331e01ae6896486df81977b5a80b20.pdf.

²²³ Meg Anderson, “Months after the ICE shootings in Minnesota, a federal probe remains elusive,” NPR, April 10, 2026, <https://www.npr.org/2026/04/10/nx-s1-5775847/alex-pretti-renee-good-ice-shootings-federal-investigations>.

²²⁴ U.S. Congress, A Review of the Fiscal Year 2027 Budget Request for DHS: House Committee on Homeland Security, June 3, 2026 at 10:00am ET, <https://homeland.house.gov/hearing/a-review-of-the-fiscal-year-2027-budget-request-for-dhs/>.

²²⁵ *State of Minnesota v. U.S. Department of Justice*, 1:26-cv-01007, (D.D.C.), <https://www.courtlistener.com/docket/72590076/state-of-minnesota-v-us-department-of-justice/>; see also Meg Anderson, “Months after the ICE shootings in Minnesota, a federal probe remains elusive,” NPR, April 10, 2026, <https://www.npr.org/2026/04/10/nx-s1-5775847/alex-pretti-renee-good-ice-shootings-federal-investigations>.

²²⁶ U.S. Congress, A Review of the Fiscal Year 2027 Budget Request for DHS: House Committee on Homeland Security, June 3, 2026 at 10:00am ET, <https://homeland.house.gov/hearing/a-review-of-the-fiscal-year-2027-budget-request-for-dhs/>.

²²⁷ Malcolm Ferguson, “ICE Agent Who Killed Renee Good in Minneapolis Gets Cushy New Job,” The New Republic, April 28, 2026, <https://newrepublic.com/post/209615/ice-agent-killed-renee-good-minneapolis-new-job>.

²²⁸ 42 U.S.C. § 1983, <https://www.law.cornell.edu/uscode/text/42/1983>.

²²⁹ *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), <https://supreme.justia.com/cases/federal/us/403/388/#tab-opinion-1949369>; *Egbert v. Boule*, 596 U.S. 482 (2022), https://www.supremecourt.gov/opinions/21pdf/21-147_g31h.pdf.

²³⁰ See *supra* Background.

²³¹ One Big Beautiful Bill Act, Public Law No. 119-21, July 4, 2025; Secure America Act, Public Law No: 119-98, June 10, 2026.

²³² Ben Raderstorf, “The Authoritarian Playbook,” Protect Democracy, Sept. 30, 2024, <https://protectdemocracy.org/work/the-authoritarian-playbook/>.

²³³ Immigration Policy Tracking Project, “Trump Administration Uses 18 USC § 111 to Arrest Protestors | Immigration Policy Tracking Project,” n.d., <https://impolicytracking.org/policies/trump-administration-uses-18-usc-111-to-arrest-protestors/>; “How ICE Agents Are Using Facial Recognition to Bring Surveillance to the Streets,” Feb. 11, 2026, <https://www.nbcnews.com/tech/security/ice-agent-facial-recognition-video-protest-movile-fortify-photo-rcna257331>.

²³⁴ Cheyanne M. Daniels and Finya Swai, “‘The Pressure Is Untenable’: Trump’s Deployment of ICE Agents to Airports Ramps up Shutdown Fight,” POLITICO, March 23, 2026, <https://www.politico.com/news/2026/03/23/trump-ice-agents-airports-tsa-shutdown-00840105>.

²³⁵ David J. Bier, “The Government Unconstitutionally Labels ICE Observers as Domestic Terrorists,” Cato Institute (blog), Dec. 15, 2025, <https://www.cato.org/blog/dhs-policy-threatening-arresting-ice-observers-violates-their-rights>.

²³⁶ Joe Allen, “Tracking Retaliatory Use of Arrests, Prosecutions, and Investigations by the Trump Administration,” Protect Democracy, May 21, 2026, <https://protectdemocracy.org/work/retaliatory-action-tracker/>.

²³⁷ See, e.g., American Immigration Lawyers Association, “AILA Rejects Administration’s Dangerous Threats on Immigration Attorneys,” AILA, May 28, 2025, <https://www.aila.org/library/aila-rejects-administration-s-dangerous-restrictions-on-immigration-attorneys>; Darika Verdugo, “Trump Administration Deploys Federal Agents to Intimidate Legal Services Nonprofits Representing Unaccompanied Immigrant Children - Amica Center,” Amica Center, June 12, 2026, <https://amicacenter.org/press-releases/trump-administration-deploys-federal-agents-to-intimidate-legal-services-nonprofits-representing-unaccompanied-immigrant-children>.

²³⁸ Kelsey Walsh et al., “Trump Continues to Call for Judge’s Impeachment After Chief Justice’s Rebuke,” ABC News, March 18, 2025, <https://abcnews.com/Politics/trump-insults-federal-judge-amid-legal-battle-deportation/story?id=119909983>.

²³⁹ Stephen Miller (@StephenM), X (July 12, 2025) <https://perma.cc/9KTP-25NR>.

²⁴⁰ DHS (@DHSgov), X (Dec. 31, 2025), <https://perma.cc/9E62-AFSX>; “Some Trump Administration Social Media Posts Mirror Extremist Rhetoric,” NBC News, Jan. 17, 2026, <https://www.nbcnews.com/tech/internet/trump-administration-social-media-posts-extremist-rhetoric-rcna254372>; Southern Poverty Law Center, “DHS Deploys White Nationalist, Anti-immigrant Graphics to Recruit,” Aug. 28, 2025, <https://www.splcenter.org/resources/hatewatch/dhs-white-nationalist-anti-immigrant-social-media/>.

²⁴¹ *Hussen v. Noem*, No. 26-CV-00324 (D. Minn. Jan. 15, 2026), <https://www.aclu.org/cases/hussen-v-noem>; ACLU of Florida, *Discrimination in Overdrive: Florida’s Immigration Crackdown Fuels Racial Profiling in Traffic Stops*, April 23, 2026, <https://www.aclufl.org/publications/discrimination-in-overdrive-floridas-immigration-crackdown-fuels-racial-profiling-in-traffic-stops/>; New York Times Editorial Board, *White Drivers Got a Warning. Latino Drivers Got Detained*, The New York Times, April 29, 2026, <https://www.nytimes.com/2026/04/29/opinion/ice-racial-profiling-supreme-court.html>.

²⁴² ACLU, ACLU of Pennsylvania, ACLU of Northern California, “ACLU Moves to Quash Abusive Subpoena Aimed at Tracking Down Man Who Criticized Department of Homeland Security,” Feb. 3, 2026, <https://www.aclu.org/press-releases/aclu-moves-to-quash-abusive-subpoena-aimed-at-tracking-down-man-who-criticized-department-of-homeland-security>; Protect Democracy, “Defending Maine communities from federal surveillance and intimidation,” Feb. 23, 2026, <https://protectdemocracy.org/work/defending-maine-communities-from-federal-surveillance-and-intimidation/>; Ashley Belanger, “DHS can’t create vast DNA database to track ICE critics, lawsuit says,” Ars Technica, May 7, 2026, <https://arstechnica.com/tech-policy/2026/05/ice-protesters-sue-to-stop-dhs-from-seizing-dna-samples/>.

²⁴³ Summer Lin, “Teen who went to photograph L.A. ‘No Kings’ rally shot, blinded by Homeland Security agent, attorney says,” Los Angeles Times, April 7, 2026, <https://www.latimes.com/california/story/2026-04-07/teen-who-attended-la-no-kings-rally-shot-blinded-by-dhs-agent-attorney-says>; *Hussen v. Noem*, No. 26-CV-00324 (D. Minn. Jan. 15, 2026), <https://www.aclu.org/cases/hussen-v-noem>; Douglas MacMillan, Andrew Ba Tran, Drea Cornejo,

and Luis Melgar, Internal ICE records reveal widespread use of force in detention centers, Washington Post, May 4, 2026, <https://www.washingtonpost.com/business/2026/05/04/ice-detention-centers-force/>.

²⁴⁴ Gabrielle Bayness, Quincy Blair, Emily Reina Dindial, Kelly McConney Moore, and Scarlet Neath, *Safe Roads for All: Evidence-Based Strategies for Keeping Our Roadways Safe*, American Civil Liberties Union, April 13, 2026, <https://www.aclu.org/documents/safe-roads-for-all>.

²⁴⁵ Letter from Rep. Chip Roy to DHS Secretary Markwayne Mullin, June 10, 2026, <https://perma.cc/94UU-8SY3>.

²⁴⁶ See, e.g., Algernon D’Amassa, “Survivor Advocates Concerned ICE Fears Deter Reporting,” Albuquerque Journal, Feb. 6, 2026, <https://www.abqjournal.com/news/survivor-advocates-concerned-ice-fears-deter-reporting/2976275>.

EMBARGOED