



October 29, 2026

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Via Electronic Mail

RE: Tailing, Boxing In, and Vandalizing Vehicle of U.S. Citizens in Hillsboro, Oregon in Retaliation for First Amendment Protected Activity

Dear Inspector General Cuffari, Ms. Fenton, and Ms. Wamsley,

We write on behalf of [REDACTED] and [REDACTED], a married couple. Mrs. and Mr. [REDACTED] are U.S. citizens and residents of Hillsboro, Oregon. This letter documents an incident where U.S. Immigration and Customs Enforcement (“ICE”) agents harassed, intimidated, and retaliated against the [REDACTED] for engaging in First Amendment protected activities. On October 7, 2026, ICE agents tailed the [REDACTED] while they were driving in their vehicle, boxed them in, and then vandalized their vehicle by repeatedly slashing one of their tires before driving away. This sequence of events occurred after the [REDACTED] observed, gathered information about, and recorded ICE agents in a nearby parking lot.

As detailed below, the [REDACTED] experienced retaliatory actions similar to those experienced by many other individuals across the country engaged in these same First Amendment protected activities. See *L.A. Press Club v. Mullin*, No. 25-cv-5563 (C.D. Cal. filed June 18, 2025); *Chi. Headline Club v. Noem*, No. 25-cv-12173 (N.D. Ill. filed Oct. 6, 2025); *Tincher v. Mullin*,

No. 25-cv-4669 (D. Minn. filed Dec. 17, 2025); *Hilton v. Mullin*, No. 26-cv-92 (D. Me. filed Feb. 23, 2026); *Demster v. Blanche*, No. 26-cv-2546 (W.D. Tenn. filed May 13, 2026); and *Moorman v. Doe No. 1*, No. 26-cv-327 (S.D. Ohio filed Sep. 1, 2026).¹ In particular, individuals around the country have reported being similarly tailed, boxed in, and threatened with or subjected to violence after observing, gathering information about, and recording ICE agents performing their duties in public.

We request that your offices promptly investigate this incident as well as undertake a comprehensive investigation of a disturbing pattern of ICE agents retaliating against individuals who observe, gather information about, and record ICE activity. We believe that significant changes in ICE training, oversight, and accountability are needed. We urge you to discipline the agents responsible for this incident and to make recommendations to ensure appropriate ICE training, oversight, and accountability to prevent further abuses.

A. October 7, 2026 Incident

On October 7, 2026, at approximately 6:15 AM, Mrs. and Mr. [REDACTED] were driving around their neighborhood. Mrs. [REDACTED] was driving and Mr. [REDACTED] was riding in the front passenger seat. At approximately 6:45 AM, they saw a car that they knew to be an ICE vehicle on the corner of Tualatin Valley Highway and Cornelius Pass Road. The car was a blue Ford Fusion with tinted windows and license plate BIS0022.

The [REDACTED] have four video cameras integrated into their vehicle—one on the front, one on the rear, and one on each side. They also have an additional front-facing dash camera, which is visible from outside their car. All five cameras were recording during the incident.

The [REDACTED] proceeded to drive behind the Ford Fusion from a safe distance for approximately five to 10 minutes. The Ford Fusion eventually drove into a Safeway parking lot, located in the Tanasbourne Village, a shopping mall.

The [REDACTED] also drove into the Safeway parking lot. They observed the Ford Fusion drive up to two other cars—a blue Nissan Altima and a black Ford F-150. The [REDACTED] pulled into a parking spot a few spots away from the three cars and remained in their car.

The [REDACTED] observed an ICE agent exit the Nissan Altima and get into the front passenger's seat of the Ford Fusion. They observed another ICE agent exit the Nissan Altima. Altogether, they saw at least five ICE agents in the parking lot. The ICE agents were wearing tactical gear that appeared to be marked "Police" and "ICE." All but one were wearing masks. They also observed an ICE agent exit the Safeway and a bystander in the Safeway parking lot.

The [REDACTED] lowered their windows. They began yelling "This is ICE! This is ICE!" and blowing whistles and honking the car's horn. The car's horn is damaged, so it is quieter than it would typically be. Mr. [REDACTED], who was sitting in the front passenger seat, also placed his phone

¹ See also David J. Bier, *The Government Unconstitutionally Labels ICE Observers as Domestic Terrorists*, Cato Inst. (Dec. 15, 2025), <https://perma.cc/FMS6-4XHH>.

outside his window and took photographs of the Nissan Altima and the Ford F-150.

The second ICE agent to exit the Nissan Altima grabbed a shopping cart from the parking lot and started approaching the [REDACTED] car with the cart. The [REDACTED] heard him say something to the effect of "let's block them in with the cart." The [REDACTED] were alarmed, but they wanted to continue to observe and record the agents from a safe distance, so they drove around the parking lot to avoid the ICE agent striking their car with the shopping cart. As the [REDACTED] drove around the parking lot, the ICE agent continued to follow them with the shopping cart.

While the [REDACTED] were driving around the parking lot, the ICE agent driving the Ford Fusion exited the vehicle and began quickly approaching and then running towards the [REDACTED] car. Another ICE agent behind him did the same. The [REDACTED] did not hear the ICE agents issue any instructions or say anything else. The [REDACTED] were frightened and decided to leave.²

As they attempted to exit the Safeway parking lot, the Ford Fusion, Nissan Altima, and Ford F-150 followed them out of the lot, driving aggressively and nearly colliding into the [REDACTED] car.³ None of the ICE vehicles had their flashing lights or sirens on. Fearing for their safety, the [REDACTED] exited the parking lot, turning south onto 185th Avenue. As they exited the parking lot, all three ICE vehicles followed them.

As the [REDACTED] drove down 185th Avenue, the Ford Fusion drove past the [REDACTED] car, pulled in front of it, and then began zigzagging in front of the [REDACTED] car. The Ford Fusion then made a sharp turn so that it was perpendicular to the front of the [REDACTED] car and attempted to box the [REDACTED] in between it and the Nissan Altima and Ford F-150, which were behind the [REDACTED] car. The ICE agent driving the Ford Fusion exited his car and aggressively approached the [REDACTED] car but did not say anything. This attempted boxing in occurred near the intersection of 185th Avenue and Walker Road. None of the ICE vehicles had their flashing lights and sirens on during this entire sequence of events.⁴

Continuing to fear for their safety, the [REDACTED] turned into another parking lot, drove through the lot, which was empty, and then exited by turning west onto Walker Road. Two of the ICE vehicles followed the [REDACTED] through the parking lot and onto Walker Road, while the third continued south on 185th Avenue and then also turned onto Walker Road. The [REDACTED] then turned north onto Stucki Avenue and all three ICE vehicles did the same. Just before the ICE

² A video recorded by one of the vehicle's cameras and capturing the ICE agent with the shopping cart and the two ICE agents running towards the [REDACTED] car is available here: <https://www.youtube.com/watch?v=zW9ezyveI8s&list=PLFZF1bn2QoUM&index=2>.

³ A video recorded by one of the vehicle's cameras and capturing the ICE vehicles driving aggressively after the [REDACTED] car is available here: <https://www.youtube.com/watch?v=2yVLZY836rw&list=PLFZF1bn2QoUM&index=2&pp=iAQB>.

⁴ A video recorded by one of the vehicle's cameras and capturing the Ford Fusion pulling in front of the [REDACTED] car, zigzagging in front of it, and cutting it off and the ICE agent exiting his car and approaching the [REDACTED] is available here: https://www.youtube.com/watch?v=XL_F20ClgPA&list=PLFZF1bn2QoUM&index=3.

vehicles turned from Walker Road onto Stucki Avenue, they turned on their flashing lights and sirens.

The [REDACTED] continued driving down Stucki Avenue for about a minute. The street was not well-populated and due to the erratic behavior of the officers, they were worried about their safety if they were to pull over on a road with no bystanders. They planned to turn onto Cornell Road, which is a larger road.

The [REDACTED] stopped at a traffic light on Stucki Avenue and Cornell Road. While stopped at the traffic light, two ICE agents in the Ford Fusion—the driver and the agent on the passenger's side—exited the vehicle and approached the [REDACTED] car from behind and to the right. Mrs. [REDACTED] gently tapped the accelerator and the car inched forward slightly and slowly. The masked ICE agent who was driving the Ford Fusion pulled a black knife out of his vest and stabbed it towards the [REDACTED] right rear tire. Mrs. [REDACTED] gently tapped the accelerator again and the car moved forward slightly and into the left turn lane. Mrs. [REDACTED] rolled down her window and waved to the ICE agents to indicate she and Mr. [REDACTED] were not a threat.

The ICE agents returned to the Ford Fusion. The same masked ICE agent who was driving the Ford Fusion exited his car a second time, ran up to the [REDACTED] right rear tire, and stabbed the tire again with his knife. This time the [REDACTED] heard a loud pop. The [REDACTED] heard no instruction or anything else from the ICE agent who slashed their tire or the other ICE agents during this sequence of events.⁵

The masked ICE agent who punctured the [REDACTED] tire returned to the Ford Fusion without further approaching the [REDACTED] or attempting to speak with them, including to cite or arrest them for any purported wrongdoing. All three ICE vehicles turned off their flashing lights and sirens and drove off, turning right onto Cornell Road.

The [REDACTED] turned left onto Cornell Road. Terrified, they pulled over to call 911. On the call, the [REDACTED] explained that a masked ICE agent had slashed their tire and that they needed a police officer to come and take a report. The [REDACTED] then did a U-turn to return to the scene where the masked ICE agent had punctured their tire.

At around 7:15 AM, Seth Honl, an officer from the Hillsboro Police Department arrived. Officer Honl took their statements and left. Officer Honl then returned about 20 minutes later. He informed the [REDACTED] that he had not taken photographs of the damage to their vehicle and that his supervisor had instructed him to do so. He then proceeded to take photographs of their vehicle and its punctured tire.

The [REDACTED] called AAA for assistance with their vehicle.

⁵ A video recorded by one of the vehicle's cameras and capturing the masked ICE agent slashing the [REDACTED] tire is available here: <https://www.youtube.com/watch?v=ZjeFPfVRuE&list=PLFZF1bn2QoUM&index=4>.

B. Conclusion

We request that your offices immediately undertake an investigation of the incident outlined above. This investigation should include identifying the ICE agents involved, preserving all relevant evidence, and disciplining the responsible ICE agents.

In addition, we request that your offices undertake a comprehensive investigation of the pervasive pattern of ICE agents unlawfully retaliating against individuals who observe, gather information about, and record ICE agents performing their duties in public. We urge you to make recommendations for institutional changes to ICE training, oversight, and accountability consistent with your findings in order to prevent further abuses by ICE personnel. More specifically, we strongly urge ICE to adopt policies and implement training and instruction consistent with the First Amendment right to observe, gather information about, and record law enforcement officers performing their duties in public, *see Askins v. U.S. Dep't of Homeland Sec.*, 899 F.3d 1035, 1044 (9th Cir. 2018); *Fordyce v. City of Seattle*, 55 F.3d 436, 439 (9th Cir. 1995), as well as Oregon's new statute prohibiting law enforcement officers from wearing masks while performing their professional duties, *see* Law Enforcement Accountability & Visibility Act, H.B. 4138, 2026 Reg. Sess. (Or. 2026) (effective Mar. 31, 2026).

Please do not hesitate to contact Scarlet Kim at scarletk@aclu.org, Ken Sexauer at ksexauer@aclu.org, Byul Yoon at byoon@aclu.org, Kelly Simon at ksimon@aclu-or.org, and Annie Kurtz at akurtz@aclu-or.org with any questions about this complaint.

Sincerely,

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