

May 1, 2026

Attorney General Charity Clark
Office of the Vermont Attorney General
109 State Street
Montpelier, VT 05609

State's Attorney Sarah George
Chittenden County State's Attorney Office
32 Cherry Street Suite 305
Burlington, VT 05401

Dear Attorney General Clark and State's Attorney George,

We respectfully urge your offices to open investigations into the activities of federal agents in Vermont. On March 11, 2026, federal agents made a series of escalatory, unlawful decisions that culminated in the use of excessive force against several peaceful protesters and the unlawful arrest of three Vermont residents who were not even the target of the operation. Federal agents have no immunity under the Constitution or federal law for many of their actions.

Background

On the morning of March 11, 2026, Colton Riley and other federal agents engaged in reckless, dangerous maneuvers in traffic, near a school, in an attempt to arrest Cristian Humberto Jerez Andrade—whom they misidentified as a different individual (Devyi Daniel Corona-Sanchez) with a warrant out for his arrest.¹ That

¹ Compass Vermont, *Vermont's Attorneys Found the One Door ICE Can't Close*, (March 31, 2026), <https://www.compassvermont.com/p/vermonts-attorneys-found-the-one> (accessed April 7, 2026); Derek Brouwer, *ICE chased wrong man on morning of Dorset Street raid, agency admits*, Vermont Public (March 24, 2026), <https://www.vermontpublic.org/local-news/2026-03-24/ice-chased-wrong-man-dorset-street-raid> (accessed April 7, 2026); Derek Brouwer et al, *ICE enforcement action leads to protest, violent clashes outside South Burlington house*, Vermont Public (March 11, 2026), <https://www.vermontpublic.org/local-news/2026-03-11/ice-enforcement-action-multi-car-crash-standoff-south-burlington> (accessed April 7, 2026); Pat Bradley, *ICE enforcement effort in South Burlington criticized*, WAMC (March 11, 2026), <https://www.wamc.org/news/2026-03-11/ice-enforcement-effort-leads-to-multi-car-accident-in-south-burlington> (accessed April 7, 2026).

individual had no violent criminal history and there is no reason to think he posed a threat to public safety.²

Jerez Andrade fled to a nearby house, where a group of protesters gathered with the consent of the owner.³ This began a ten-hour standoff. Federal agents ultimately obtained a warrant for the house—which was not Andrade’s home or the home of the man they still believed Andrade to be—entered, and used unnecessary and violent force against the occupants. Jerez Andrade’s nephew, a U.S. citizen,⁴ describes federal agents “picking him up off of the floor, slamming him and his uncle against the wall, throwing him back to the floor, handcuffing him while on the floor, taking his identification, [and] pointing a gun at him.”⁵ It has also been reported that an agent tripped and accidentally discharged their service weapon during the arrest.⁶ Federal agents arrested and detained Jerez Andrade and two women who were also in the home, none of whom were on the warrant.⁷ There is also evidence that federal agents used excessive force against protesters and observers while they were exiting the home and neighborhood, and again when they returned to the scene to retrieve a vehicle.⁸ One Vermont state trooper reports

² Derek Brouwer et al, *ICE enforcement action leads to protest, violent clashes outside South Burlington house*, Vermont Public (March 11, 2026), <https://www.vermontpublic.org/local-news/2026-03-11/ice-enforcement-action-multi-car-crash-standoff-south-burlington> (accessed April 7, 2026).

³ Sasha Goldstein & Lucy Tompkins, *Chaos Breaks Out at Scene of ICE Arrests in South Burlington*, Seven Days (March 11, 2026), <https://www.sevendaysvt.com/news/dozens-protest-at-scene-of-ice-action-in-south-burlington/> (accessed April 7, 2026); Derek Brouwer et al, *ICE enforcement action leads to protest, violent clashes outside South Burlington house*, Vermont Public (March 11, 2026), <https://www.vermontpublic.org/local-news/2026-03-11/ice-enforcement-action-multi-car-crash-standoff-south-burlington> (accessed April 7, 2026).

⁴ Paul Heintz, *Vermont Police Told ICE to Stand Down. The Federal Agents Didn’t Listen*, Boston Globe (Apr. 21, 2026), https://www.bostonglobe.com/2026/04/21/metro/vermont-ice-protest-videos-report/?s_campaign=8315:varf (accessed April 27, 2026).

⁵ *Jerez Andrade v. Trump*, Order on Petition for Habeas Corpus, 26-cv-00069, at *4–*5 (D. Vt. March 17, 2026).

⁶ Paul Heintz, *Officials condemn ICE’s actions at violent Vermont protest, while advocates question state’s role*, Boston Globe (March 12, 2026), <https://www.bostonglobe.com/2026/03/12/metro/vermont-ice-protest/> (accessed April 7, 2026).

⁷ Derek Brouwer & Peter Hirschfeld, *ICE, Vermont police face scrutiny following Dorset Street standoff*, Vermont Public (March 12, 2026), <https://www.vermontpublic.org/local-news/2026-03-12/ice-vermont-police-face-scrutiny-following-dorset-street-standoff> (accessed April 7, 2026); Derek Brouwer et al, *ICE enforcement action leads to protest, violent clashes outside South Burlington house*, Vermont Public (March 11, 2026), <https://www.vermontpublic.org/local-news/2026-03-11/ice-enforcement-action-multi-car-crash-standoff-south-burlington> (accessed April 7, 2026).

⁷ Sasha Goldstein & Lucy Tompkins, *Chaos Breaks Out at Scene of ICE Arrests in South Burlington*, Seven Days (March 11, 2026), <https://www.sevendaysvt.com/news/dozens-protest-at-scene-of-ice-action-in-south-burlington/> (accessed April 7, 2026).

⁸ Sasha Goldstein & Lucy Tompkins, *Chaos Breaks Out at Scene of ICE Arrests in South Burlington*, Seven Days (March 11, 2026) (for example, video appears to show a Vermont State Trooper banging on the windshield of a federal agent’s car to prevent him from running over a protester, and federal agents releasing “flash-bang” explosives after their path out of the premises have been cleared) <https://www.sevendaysvt.com/news/dozens-protest-at-scene-of-ice-action-in-south-burlington/> (accessed April 7, 2026); Paul Heintz, *Vermont Police Told ICE to Stand Down. The Federal Agents*

being sprayed with pepper spray and hit with non-lethal pepper ball impact projectiles.⁹

Although Riley expressed confidence that the man in the house was Corona-Sanchez when he signed an affidavit seeking a warrant, bodycam footage shows that he in fact was not certain, dismissively telling local law enforcement: “assuming that’s him. Doesn’t matter at this point.”¹⁰ Furthermore, ICE insisted on moving forward with its plan to raid the house, despite the fact that Vermont agencies “immediately determined that this plan presented an unacceptable public safety risk,” and local leaders of the FBI and Homeland Security Investigations expressed concerns about the plan and proposed alternatives.¹¹

We urge your office to carefully review these incidents to determine whether federal agents violated Vermont criminal law in carrying out this raid. Even if the federal agents obtained a warrant or otherwise had legal bases for making certain arrests, neither fact would permit them to commit violent assaults on the people being raided or arrested. And the versions of events being shared by the agents bear troubling resemblance to the other self-serving accounts that President Trump, Department of Homeland Security officials, and federal agents across the country have used to cover up or justify violence, and which later have been proven unreliable and inaccurate.¹² For example, officers have repeatedly claimed that they were justified in assaulting vehicle occupants because the driver purported “weaponized” the vehicle against the officers,¹³ including in the murder of Renee

Didn't Listen, Boston Globe (Apr. 21, 2026), https://www.bostonglobe.com/2026/04/21/metro/vermont-ice-protest-videos-report/?s_campaign=8315:varf (accessed April 27, 2026).

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² George Chidi, *Trump officials continue to push lies after fatal shooting of Alex Pretti*, The Guardian (Jan. 26, 2026), <https://www.theguardian.com/us-news/2026/jan/26/trump-administration-alex-pretti-shooting-statements> (accessed April 8, 2026); Robert Mackey, *Video contradicts Trump’s claim man killed in Minneapolis was a ‘gunman’*, The Guardian (Jan. 24, 2026), <https://www.theguardian.com/us-news/2026/jan/24/minneapolis-shooting-ice> (accessed April 8, 2026); Richard Luscombe, *Trump administration unleashes torrent of untruths after woman shot dead by ICE*, The Guardian (Jan. 9, 2026), <https://www.theguardian.com/us-news/2026/jan/09/white-house-minneapolis-ice-killing> (accessed April 8, 2026).

¹³ Sophia Tareen, *Lawyers of Chicago woman shot by federal agents say documents show how DHS lies about investigations*, PBS (Feb. 12, 2026), <https://www.pbs.org/newshour/politics/lawyers-of-chicago-woman-shot-by-federal-agents-say-documents-show-how-dhs-lies-about-investigations> (accessed April 8, 2026); Ryan Goodman, *Initially-Secret Report: Customs & Border Patrol Agents Got in Way of Vehicles, Then Used Deadly Force*, YouTube (Jan. 11, 2026), <https://www.youtube.com/watch?v=izontr5Tp4> (accessed April 8, 2026); Brenna T. Smith et al, *Videos Show How ICE Vehicle Stops Can Escalate to Shootings*, The Wall Street J. (Jan. 10, 2026), <https://www.wsj.com/us-news/videos-show-how-ice-vehicle-stops-can-escalate-to-shootings-caf17601> (accessed April 8, 2026); Andrew Schwartz, *Documents Allege a Federal Agent at Portland ICE Threatened to Shoot an Ambulance Driver*, Willamette Week (Oct. 12, 2025), <https://www.wweek.com/news/2025/10/12/documents-allege-a-federal-agent-at-portland-ice-threatened-to-shoot-an-ambulance-driver/> (accessed April 8, 2026);

Nicole Good,¹⁴ only for video footage and eye witness accounts to disprove these claims.

We applaud Attorney General Clark for actively engaging in civil suits against Trump,¹⁵ and State's Attorney George for publicly condemning the ICE raid in South Burlington.¹⁶ We also strongly urge your office to be prepared to investigate and prosecute federal officials who violate Vermont criminal laws. Given that the US Department of Justice under the Trump administration will not investigate federal agents' use of unlawful force, it falls on Vermont officials to protect Vermont residents and ensure accountability.

The Supremacy Clause Does Not Preclude Prosecution

The Supremacy Clause “is designed to ensure that states do not ‘retard, impede, burden, or in any manner control’ the execution of federal law.” *New York v. Tanella*, 374 F.3d 141, 147 (2d Cir. 2004) (quoting *McCulloch v. Maryland*, 17 U.S. (4 Wheat.) 316, 436 (1819)). It does not, however, “gran[t] a license to federal officials to flout state laws with impunity.” *Whitehead v. Senkowski*, 943 F.2d 230, 234 (2d Cir. 1991); see also *Idaho v. Horiuchi*, 253 F.3d 359, 362 (9th Cir.), *vacated as moot*, 266 F.3d 979 (9th Cir. 2001) (“When federal officers violate the Constitution, either through malice or excessive zeal, they can be held accountable for violating the state's criminal laws.”).

Under the test set forth by the Supreme Court in *Cunningham v. Neagle*, a federal officer is entitled to immunity from state criminal prosecutions if “he was authorized to [act] by the law of the United States,” and that “in doing that act, he did no more than what was necessary and proper for him to do.” 135 U.S. 1, 75 (1890); see also *Tanella*, 374 F.3d at 147; *Clifton v. Cox*, 549 F.2d 722, 726, 728 (9th Cir. 1977). To satisfy the “necessary and proper” part of the test, (1) the officer must

Renee Hickman, *Bodycam footage conflicts with DHS account of Chicago woman's shooting by Border Patrol, lawyer says*, Reuters (Oct. 9, 2025), <https://www.reuters.com/world/us/bodycam-footage-conflicts-with-dhs-account-chicago-womans-shooting-by-border-2025-10-08/> (accessed April 8, 2026); Renee Hickman & Brad Brooks, *Footage of deadly ICE shooting in Chicago suburb challenges official narrative*, Reuters (Sep. 25, 2025), <https://www.reuters.com/world/us/police-records-witness-accounts-complicate-dhs-narrative-fatal-chicago-area-ice-2025-09-24/> (accessed April 8, 2026); Molly DeVore, *ICE Agent Who Killed Man In Alleged Self-Defense Said Injuries Were ‘Nothing Major,’ Video Shows*, Block Club Chicago (Sep. 23, 2025), <https://blockclubchicago.org/2025/09/23/ice-agent-in-franklin-park-fatal-shooting-said-his-injuries-were-nothing-major-report-says/> (accessed April 8, 2026).

¹⁴ Amanda Musa, *Mother of 3 who loved to sing and write poetry shot and killed by ICE in Minneapolis*, CNN (Jan. 9, 2026), <https://www.cnn.com/2026/01/08/us/renee-nicole-good-minneapolis-ice-shooting-hnk> (accessed Jan. 30, 2026).

¹⁵ *Attorney General Clark Sues Trump Administration Over Mail-In Voting Executive Order*, Office of the Vermont Attorney General (April 3, 2026), <https://ago.vermont.gov/blog/2026/04/03/attorney-general-clark-sues-trump-administration-over-mail-voting-executive-order> (accessed April 8, 2026).

¹⁶ Sarah George (@sarahfairgeorgesa), Instagram (March 12, 2026), <https://www.instagram.com/p/DVyhoaUDlOx/> (accessed April 8, 2026).

subjectively believe his acts to be reasonable; and (2) his conduct must be objectively “reasonable under the existing circumstances.” *Id.* at 728. Where any one of these qualifications are not met, federal officers may be held criminally liable for violating state laws. *Morgan v. People of State of California*, 743 F.2d 728, 733–34 (9th Cir. 1984) (federal agents who may have instigated an altercation with civilians while intoxicated were not immune to state prosecution); *Pales v. Paoli*, 5 F.2d 280, 280–82 (1st Cir. 1925) (federal agent who fired on a car after attempting to stop it without reasonable suspicion acted in a “wholly illegal and unauthorized” manner and could be prosecuted).

Insofar as federal agents were using excessive force in response to the protests against their arrest, there is simply no lawful authority that empowers agents to punish his political adversaries with assault. *NRA v. Vullo*, 602 U.S. 175, 188 (2024) (the government may not “use the power of the State to punish or suppress disfavored expression”).

Nor are federal agents authorized to unlawfully detain, harass, or abuse civilians. Federal agents may not detain individuals, including noncitizens, without warrant or probable cause, and they may not preemptively detain people and then require proof of citizenship as the price of freedom. *Almeida-Sanchez v. United States*, 413 U.S. 266, 273–75 (1973); *see also id.* at 275 (“Among deprivations of rights, none is so effective in cowering a population, crushing the spirit of the individual and putting terror into every heart. Uncontrolled search and seizure is one of the first and most effective weapons in the arsenal of every arbitrary government.”) (quoting *Brinegar v. United States*, 338 U.S. 160, 180 (1949) (Jackson, J., dissenting)). And they may not harass or abuse protesters engaged in protected speech, which includes recording public officials in public spaces and even verbally criticizing the officers. *See Reyes v. City of New York*, No. 23-CV-6369 (JGLC), 2024 WL 4354877, at *5 (S.D.N.Y. 2024) (appellate courts “have uniformly recognized” that “the First Amendment protects the right to record police in public performing their official duties”); *Houston v. Hill*, 482 U.S. 451, 461 (1987).

Nor can the perpetrators evade culpability by claiming that they were following orders when the acts otherwise fail the *Neagle* test. *Cf. Pales v. Paoli*, 5 F.2d 280, 280–82 (1st Cir. 1925) (an agent who followed orders to carry out unlawful searches did not have immunity for crimes committed in the course of those searches); *Drury*, 200 U.S. at 8 (fatally shooting a surrendered suspect on a superiors’ orders “could not reasonably be claimed [to have been done] in the performance of a duty imposed by the Federal law.”). Instead, senior officials who give these orders or orchestrate unlawful raids should themselves be subject to investigation.

The available evidence does not support a claim of immunity, but even if there were a dispute of fact over immunity, potential immunity would not prevent

state criminal investigations. *Drury*, 200 U.S. at 7–8; *Whitehead*, 943 F.2d at 235–36 (fact disputes precluded federal immunity); *Morgan*, 743 F.2d at 733–34 (same).

Investigating Federal Abuses

Federal agents have committed a wave of assaults,¹⁷ kidnappings,¹⁸ and even theft¹⁹ across the country as they engage in unlawful immigration operations intended to terrorize communities of color and stifle political dissent. Accordingly, we urge all Vermont prosecutors, law enforcement, and officers to make what should be an uncontroversial statement: when Vermont residents are illegally assaulted, kidnapped, abused, subject to theft, or otherwise harmed by federal agents who are violating Vermont’s criminal laws, the perpetrators of those crimes will be prosecuted.

We recognize that the federal government has adopted a policy of noncooperation with local and state authorities in investigating incidents involving its federal officers.²⁰ Therefore, we urge you to take steps to ensure that neither the administration’s targeting of vulnerable communities nor its attempts to cover up the abuses of its agents disrupt the enforcement of the rule of law in Vermont.

First, we urge you to ensure that residents have a safe way to report violations of state criminal law by federal agents. Victims and witnesses must be able to report instances of abuse without fear of retribution or retaliation from the Trump administration.

Second, we encourage the Attorney General and the various State’s Attorneys to release guidance to Vermont law enforcement in line with that released by

¹⁷ Nicole Foy & 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> (accessed April 13, 2026)

¹⁸ Nicole Foy, *We Found That More Than 170 U.S. Citizens Have Been Held by Immigration Agents. They’ve Been Kicked, Dragged and Detained for Days.*, ProPublica (Oct. 16, 2025), <https://www.propublica.org/article/immigration-dhs-american-citizens-arrested-detained-against-will> (accessed April 13, 2026).

¹⁹ Nicole Foy & 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> (accessed April 13, 2026); Kyle McClenagan, *Before a man was deported to Mexico, his son says they were assaulted by unidentified officers in Houston*, Houston Public Media (Oct. 28, 2025), <https://www.houstonpublicmedia.org/articles/news/politics/immigration/2025/10/28/534487/ice-houston-immigration-fiel-deportation/> (accessed April 13, 2026).

²⁰ Ernesto Londoño, *Once Again, Federal Officials Exclude Minnesota From Investigation of a Fatal Shooting*, N.Y. Times (Jan. 25, 2026), <https://www.nytimes.com/2026/01/25/us/federal-exclude-minnesota-shooting-investigations.html> (accessed March 20, 2026).

Ramsey County Attorney John Choi in Minnesota²¹ and Mayor Mike Johnston in Denver, Colorado.²² Finally, if you have a basis to request or subpoena information from a federal official or agency about incidents in Vermont, we urge you to do so.²³

By taking these steps and by committing to investigating potential state crimes, you will be joining other proactive investigatory and prosecutorial agencies in the country. Investigations of federal agents are underway in Illinois, Colorado, Minnesota, and Oregon.²⁴ Prosecutors in Arizona, California, Illinois, Pennsylvania, Texas, and Virginia have made public statements that federal officers do not have absolute immunity from state criminal prosecution.²⁵ Officials in Denver, Colorado have ordered local law enforcement officers to intervene if federal agents use

²¹ Mohamed Ibrahim, *Ramsey County prosecutor opens investigations into federal officers, calls for public reports*, Sahan Journal (Jan. 27, 2026), <https://sahanjournal.com/public-safety/ramsey-county-attorney-john-choi-investigates-federal-officers/> (accessed March 20, 2026).

²² *Report Misconduct by Federal Agents to the California Attorney General*, California Department of Justice, <https://oag.ca.gov/ReportMisconduct>, (accessed March 20, 2026).

²³ Such requests can be enforced in federal court, if not in state court. For example, Minnesota officials successfully moved for a TRO to preserve evidence of Alex Pretti's murder. Caroline Cummings, *Federal judge orders feds to preserve evidence in Border Patrol shooting of Alex Pretti*, CBS (Jan. 26, 2026), <https://www.cbsnews.com/minnesota/news/preserve-evidence-alex-pretti-shooting-minneapolis-federal-judge-ruling/> (accessed March 20, 2026).

²⁴ Ernesto Londoño, *Once Again, Federal Officials Exclude Minnesota From Investigation of a Fatal Shooting*, N.Y. Times (Jan. 25, 2026), <https://www.nytimes.com/2026/01/25/us/federal-exclude-minnesota-shooting-investigations.html> (accessed March 20, 2026); Jack Morphet & Kris Maher, *Police Who Once Backed ICE's Mission Are Losing Faith in Its Tactics*, Wall Street Journal (Jan. 24, 2026), <https://www.wsj.com/us-news/police-who-once-backed-ices-mission-are-losing-faith-in-its-tactics-e123c348> (accessed March 20, 2026); Press Release, Hennepin County Attorney's Office (Jan. 9, 2026), <https://www.hennepinattorney.org/news/news/2026/January/HCAO-Evidence-Submission-Portal> (accessed March 20, 2026); Yesenia Amaro, *Can Oregon prosecute federal agents? State officials say they'll try*, The Oregonian (Dec. 1, 2025), <https://www.oregonlive.com/politics/2025/11/can-oregon-prosecute-federal-agents-state-officials-say-theyll-try.html> (accessed March 20, 2026); Jack Healy, *An Altercation With ICE Prompts a Police Chief to Push Back*, N.Y. Times (Nov. 3, 2025), <https://www.nytimes.com/2025/11/03/us/politics/durango-colorado-ice-protester.html> (accessed March 20, 2026); Dave Savini & Samah Assad, *Broadview police chief accuses ICE agents of making false 911 calls*, CBS News (Oct. 2, 2025), <https://www.cbsnews.com/chicago/news/broadview-police-chief-thomas-mills-ice-agents-false-911-calls/> (accessed March 20, 2026).

²⁵ Shaila Dewan, *Local Prosecutors Join Forces to Bring Charges Against Federal Agents*, N.Y. Times (Jan. 27, 2026), <https://www.nytimes.com/2026/01/27/us/prosecutors-charges-against-federal-agents.html> (accessed March 20, 2026); *Law Enforcement Guidance Statement*, Rob Bonta, Attorney General (Jan. 27, 2026), <https://oag.ca.gov/system/files/media/2026-dle-07.pdf> (accessed March 20, 2026); Public Statement, Lake County State's Attorney's Office, (Jan. 25, 2026), <https://lcsao.org/DocumentCenter/View/372/Statement-Minneapolis?bidId=> (accessed March 20, 2026); Heather Knight & Kellen Browning, *Pelosi Says Police May Arrest Federal Agents Who Violate California Law*, N.Y. Times (Oct. 22, 2025), <https://www.nytimes.com/2025/10/22/us/politics/nancy-pelosi-ice-agent-arrest.html?smid=nytcore-ios-share&referringSource=articleShare> (accessed March 20, 2026).

excessive force against residents.²⁶ And officials in California,²⁷ Colorado,²⁸ Illinois,²⁹ Massachusetts,³⁰ Maine,³¹ Minnesota,³² New York,³³ New Jersey,³⁴ and Oregon³⁵ have created tools for residents to report abuses by federal officials. And in Minnesota, prosecutors in Hennepin County recently charged a federal immigration with assault after an incident in February 2026, in which drove his unmarked SUV alongside another car and pointed his gun at the occupants.³⁶

State governments have a critically important role in this nation's system of laws that must prevent, not enable, the rise of a lawless regime. As New York previously demonstrated in its prosecution of Donald Trump for falsifying business records to cover up his hush money payments to an adult film star during his 2016 campaign, *see New York v. Trump*, Verdict Sheet, Indictment No. 71543-23 (Sup. Ct. N.Y. Part 59, May 29, 2024), states have the authority and responsibility to protect

²⁶ Lindsey Toomer, *Denver policies seek to protect city residents from federal immigration enforcement*, Colorado Newline (Feb. 28, 2026), <https://coloradonewline.com/briefs/denver-protect-residents-immigration-enforcement/> (accessed March 20, 2026).

²⁷ *Report Misconduct by Federal Agents to the California Attorney General*, California Department of Justice, <https://oag.ca.gov/ReportMisconduct>, (accessed March 20, 2026).

²⁸ *Misconduct by Federal Agents*, Colorado Attorney General, <https://complaints.coag.gov/s/?varCFT=7> (accessed March 20, 2026).

²⁹ Illinois Accountability Commission, <https://ilac.illinois.gov/> (accessed April 8, 2026).

³⁰ *Governor Healey and Attorney General Campbell Launch State Portal to Report ICE Misconduct*, Office of the Governor (March 13, 2026), <https://www.mass.gov/news/governor-healey-and-attorney-general-campbell-launch-state-portal-to-report-ice-misconduct> (accessed March 20, 2026).

³¹ *Attorney General's Office Establishes Dedicated Email Address to Report Federal Government Action in Maine*, Office of the Maine Attorney General (Jan. 26, 2026), <https://www.maine.gov/ag/news/article.shtml?id=13341312> (accessed April 8, 2026).

³² *Hennepin County (MN) Attorney's Office Evidence Submission Portal*, Hennepin County Attorney's Office, <https://hennepinprosecutor.evidence.com/axon/community-request/public/communityevidencerequest1-7-26> (accessed March 20, 2026).

³³ *Attorney General James Launches Portal to Collect Photos and Videos of ICE Activity in New York*, Office of the New York State Attorney General (Oct. 22, 2025), <https://ag.ny.gov/press-release/2025/attorney-general-james-launches-portal-collect-photos-and-videos-ice-activity> (accessed April 8, 2026).

³⁴ *Report Misconduct by Federal Agents Conducting Immigration Enforcement to the New Jersey Attorney General*, State of New Jersey Department of Law and Safety, <https://www.njoag.gov/portal/> (accessed March 20, 2026).

³⁵ *Report Concerns Related to Federal Actions*, Oregon Department of Justice, <https://www.doj.state.or.us/oregon-department-of-justice/federal-oversight/report-concerns-related-to-federal-actions/> (accessed March 20, 2026).

³⁶ Sheila M. Eldred, Ernesto Londoño, & Julie Bosman, *ICE Agent Charged With Assault After Motorists Say He Brandished Gun*, N.Y. Times (Apr. 16, 2026), <https://www.nytimes.com/2026/04/16/us/minnesota-prosecution-ice-agent.html> (accessed April 27, 2026); Associated Press, *County Prosecutor Charges ICE Agent With Assault For Pointing Gun at People on Minneapolis Highway*, Politico (Apr. 16, 2026), <https://www.politico.com/news/2026/04/16/county-prosecutor-charges-ice-agent-with-assault-for-pointing-gun-at-people-on-minneapolis-highway-00877884> (accessed April 27, 2026).

their residents and enforce their laws, regardless of defendants' wealth, power, or prestige.

Vermont need not and should not wait for its residents to institute civil actions or for the criminal and removal proceedings to reveal the scope of the Trump Administration's abuses, particularly given the lengths to which the Trump Administration has gone to evade oversight and hide the identities and criminal behavior of individual agents.³⁷ Vermont has the power and duty to enforce its criminal laws, including against federal actors when they commit crimes in the state.

Conclusion

We urge your offices to immediately begin a thorough investigation to determine whether charges should be brought against those responsible for the unlawful conduct cited in this letter. Furthermore, we remain seriously concerned that federal officers will continue to violate your state's criminal laws in their raids and assaults on immigrant communities, protesters, and other residents in your city and state. We encourage you to respond to, investigate, and as appropriate prosecute any crimes committed by federal agents and officials.

Sincerely,

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³⁷ J. David McSwane & Hannah Allam, *Unfettered and Unaccountable: How Trump is Building a Violent, Shadowy Federal Police Force*, ProPublica (Oct. 18, 2025), <https://www.propublica.org/article/trump-dhs-ice-secret-police-civil-rights-unaccountable> (accessed April 13, 2026); The Associated Press, *Trump Administration Sues California Over Law Banning Masked Federal Agents*, NBC News (Nov. 18, 2025), <https://www.nbcnews.com/news/us-news/trump-administration-sues-california-law-banning-masked-federal-agents-rcna244679> (accessed April 13, 2026).