



DEPARTMENT OF JUSTICE

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November 24, 2025

The Honorable Pam Bondi
Attorney General, U.S. Department of Justice
950 Pennsylvania Ave NW
Washington, DC 20530

The Honorable Kristi Noem
Secretary, U.S. Department of Homeland Security
MS0525
2707 Martin Luther King Jr Ave SE
Washington, DC 20528-0525

RE: Notice of Investigation and Demand to Cease and Desist Unlawful Actions

Attorney General Bondi and Secretary Noem:

Americans are expected to follow the laws of the United States in addition to those of any state they are in. This includes federal officers acting within the state of Oregon and under the authority of the U.S. Department of Homeland Security (DHS).

During the past six months, Oregonians have repeatedly reported the use of excessive force by DHS employees throughout Oregon. The frequency and nature of these incidents suggest a pattern of behavior on behalf of your agencies and may be violations of Oregon law.

This letter serves as notice that the Oregon Department of Justice and signatory county district attorneys are actively monitoring past and current conduct of federal officers in our jurisdictions. The Oregon Attorney General intends to investigate any case where it appears a federal officer is engaging in conduct beyond the reasonable scope of their duties in executing and enforcing federal law. Any such investigations revealing criminal conduct by individual federal officers will be referred to the district attorney to evaluate for prosecution. The Supremacy Clause only affords immunity to federal officers from State criminal prosecution in the reasonable discharge of their duties, and not beyond.

We also request that you comply with the following actions to improve public safety:

1. Cease and desist all unlawful and unconstitutional actions within Oregon and upon its citizens;
2. Provide and require appropriate training for all persons that will have, or could reasonably be expected to have, direct contact with residents of Oregon;
3. Maintain communication and coordination with local law enforcement to ensure the safety of all Oregonians who are peacefully exercising their constitutional rights at the Immigration and Customs Enforcement facility at 4310 S. Macadam Avenue in Portland;
4. Investigate all credible accusations of excessive force by federal employees for potential misconduct; and
5. Cooperate with all state investigations into potential violations of Oregon law.

These demands have been carefully targeted to improve the safety of residents of Oregon, prevent future violations, and ensure accountability when state and federal laws are not followed. These demands are not made lightly. Under normal circumstances, state officials would defer to the investigatory processes of the federal government for actions by its agents and employees. But the excessive actions DHS agents are taking against residents of Oregon, including local law enforcement officials, indicate these are not normal circumstances.

Evidence introduced recently at trial in *State of Oregon v. Donald Trump* documented the frequent disproportionate use of force by DHS in response to protests near the Immigration and Customs Enforcement facility in Portland. Senior leaders from both DHS and the Portland Police Bureau (PPB) testified under oath that federal law enforcement used excessive force against nonviolent protesters.

Additionally, we have seen multiple reports of immigration enforcement actions conducted throughout Oregon that appear to involve excessive amounts of force, creating safety concerns in the community. In October, an unmarked van with federal agents stopped a group of teenagers at gunpoint at a Dutch Bros Coffee drive thru in Hillsboro, creating a volatile situation as community members called 911. Last week, federal agents reportedly arrested a 17-year-old high school student and US citizen in McMinnville after stopping his car and breaking through his window while he was on a lunch break from school. These examples, among others, are highly concerning.

Citizens exercising their constitutional rights have been accosted with tear gas and pepper balls, shot with nonlethal munitions, and subjected to takedowns that were disproportionate to any evident threat. DHS personnel have repeatedly teargassed each other, law enforcement officers from the PPB, and on at least one occasion officers from the Oregon State Police. In at least one incident, a DHS law enforcement officer hit a Portland Police officer with a munition. Many of these incidents were captured on DHS's own video.

Your role in maintaining public safety, effectuating the laws of the United States, and protecting federal property are important responsibilities. Nothing in this letter is meant to detract from that responsibility. Those objectives, however, must not come at the expense of the

collaborative relationship between federal, state, and local officials that is essential for a functioning public safety system, or at the expense of the civil liberties of the residents of Oregon.

Each time law enforcement acts unlawfully, in violation of our Constitution, or with unwarranted force, it undermines public trust and confidence in our government and weakens the very principles our nation stands for. Keeping communities safe and holding those who commit violent crimes accountable can only happen when the public has trust in all our law enforcement institutions. The public does not often differentiate between abuses by one agency or another—they just view it as abuse by “law enforcement.”

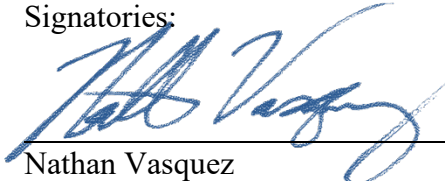
Please know that our door will always be open to ways we can better collaborate to improve public safety and find solutions aimed at ensuring the safety and security of Oregonians and all Americans.

Sincerely,



Dan Rayfield
Attorney General of Oregon

Signatories:



Nathan Vasquez
Multnomah County District Attorney



Kevin Barton
Washington County District Attorney



John Wentworth
Clackamas County District Attorney