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12 *Counsel for Plaintiff*

13 **UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 **The Center for Investigative Reporting,**

Case No. 3:26-cv-1145

16 Plaintiff,

**Complaint for Injunctive Relief**

17 v.

18 **United States Immigration and Customs  
Enforcement; United States Customs and  
Border Protection,**

20 Defendants.

22 The Center for Investigative Reporting (“CIR”) brings this suit against the United  
23 States Immigration and Customs Enforcement (“ICE”) and United States Customs and Bor-  
24 der Protection (“CBP), stating in support:  
25

26 **INTRODUCTION**

27 1. This is an action under the Freedom of Information Act (“FOIA”), 5 U.S.C.  
28 § 552, for declaratory, injunctive, and other appropriate relief.

2. Through the FOIA, CIR seeks disclosure of public records, including video footage possessed by ICE and CBP relating to immigrant deportation actions conducted in Chicago and Los Angeles in fall and winter of 2025.

3. According to reports, ICE and CBP have actively used video footage of immigration raids to promote their operations and to try to improve their public image.

4. Many of the requested records are nearly identical in nature to records that the agency has previously released to the public. *See Immigrant Legal Defense v. U.S. Dep’t of Homeland Security, et al.*, 3:23-cv-06348 (N.D. Cal); *see also* Immigrant’s Rights Clinic, *Ice, Camera, Action: Exposing ICE’s Filming Operation*, Stanford Law School, <https://law.stanford.edu/immigrants-rights-clinic/ice-camera-action-exposing-ices-filming-operations/>.

5. To date, neither agency has complied with FOIA's statutory deadlines. Both have improperly and unlawfully withheld public records responsive to CIR's FOIA requests.

6. ICE and CBP have therefore violated the FOIA and have contravened the FOIA's purpose, because the withheld information will greatly inform the public about "what their government is up to." *Dep't of Justice v. Reporters Comm. for Freedom of Press*, 489 U.S. 749, 773 (1989).

7. CIR now asks the Court for an injunction requiring the agencies to promptly release the withheld records.

## JURISDICTION

8. The Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

## VENUE AND INTRADISTRICT ASSIGNMENT

9. CIR has its principal place of business in this district. Venue is thus proper under 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. §§ 1391(e) and 1402.

10. Assignment to the San Francisco Division or the Oakland Division is proper pursuant to Local Rules 3-2(c) and (d) because a substantial portion of the events giving rise to this action occurred in San Francisco County, where CIR's principal place of business is located and most actions in this case occurred.

## PARTIES

11. Founded in 1976 as the first national investigative news organization, CIR has received multiple awards for its reporting. CIR is a non-profit established under the laws of the State of California, with its primary office in San Francisco, California. CIR publishes *Reveal*, an online news site at [revealnews.org](http://revealnews.org), a weekly public radio show (also called *Reveal*) with approximately 1 million listeners a week, and *Mother Jones* magazine.

12. ICE is a federal agency within the meaning of 5 U.S.C. § 552(f). CIR is informed and believes that ICE has possession and control of the records sought by the FOIA requests.

13. CBP is a federal agency within the meaning of 5 U.S.C. § 552(f). CIR is informed and believes that ICE has possession and control of the records sought by the FOIA requests.

## BACKGROUND

**A. ICE and CBP conduct deportation operations in major U.S. cities.**

14. In the summer and fall of 2025, as part of the Trump Administration's promised campaign of mass deportations of undocumented immigrants from the United States, ICE and CBP agents were deployed in large numbers in cities throughout the country, including major operations in Chicago and Los Angeles.

15. Where these immigration operations have occurred, criticism of them has followed. So, too, have lawsuits alleging that ICE agents and other federal officers carrying out these missions have “employ[ed] disproportionate levels of force and escalation tactics” against raid targets and protestors that are allegedly “unwarranted by the threat levels presented.”<sup>1</sup>

16. ICE and DHS have actively used edited video footage of these immigration raids to promote their operations and try to improve their public image.<sup>2</sup>

<sup>1</sup> See Compl., *Vasquez Perdomo v. Noem*, No. 2:25-cv-05605 (C.D. Cal. July 11, 2025).

<sup>2</sup> See Joyce Sohyun Lee and Drew Harwell, *It's A War, Inside ICE's media machine*, Washington Post (Dec. 23, 2025), <https://www.washingtonpost.com/technology/interactive/2025/ice-social-media-blitz/>.

1       17. Through this action, CIR seeks video recordings the agency has collected,  
 2 used and published, as well as other public records, to advance the public's understanding of  
 3 deportation operations, as well as to verify the government's statements about these opera-  
 4 tions, carried out in Los Angeles and Chicago in 2025.

5                   **1. Agents execute several operations in Los Angeles in mid-2025.**

6       18. On or about June 12, 2025, ICE agents were carrying out enforcement actions  
 7 in Los Angeles' Huntington Park neighborhood. During one of the actions in the area, Home-  
 8 land Security Secretary Kristi Noem joined agents on what the agency characterized as a tar-  
 9 geted mission to detain an undocumented man. In the early morning raid, Noem and a "half-  
 10 dozen vehicles carrying heavily armed, masked" ICE agents appeared at the home of a preg-  
 11 nant woman, claimed to be seeking her husband, demanded she and her children leave their  
 12 house, and eventually left without taking anyone into custody.<sup>3</sup>

13       19. Approximately three weeks later, on July 7, 2025, federal agents, several on  
 14 horseback, stormed a mostly empty MacArthur Park as "[m]ilitary-style vehicles blocked the  
 15 street and a federal helicopter flew overhead" and "[c]amera crews followed alongside  
 16 them."<sup>4</sup> The operation ended without any arrests or detentions, prompting local leaders to  
 17 characterize their spectacle as an attempt to intimidate the community.<sup>5</sup>

18       20. The next month, on August 14, 2025, ICE and CBP agents appeared in force  
 19 near the city's Japanese American National Museum as Gov. Gavin Newsom held a press  
 20 conference there.<sup>6</sup> The operation resulted in a single arrest—of a man who was delivering

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21                   <sup>3</sup> See, e.g., Josh DuBose, *DHS Secretary Kristi Noem attends ICE raid at Los Angeles County*  
 22 *home*, KTLA (June 12, 2025), <https://ktla.com/news/local-news/dhs-secretary-kristi-noem-attends-ice-raid-at-home-of-pregnant-l-a-county-mother/> ("Cameras inside the home cap-  
 23 tured the heavily armed ICE agents going through the residence room by room, all while  
 24 Noem, wearing a bulletproof vest and ballcap, watched from the street.").

25                   <sup>4</sup> See Jill Cowan & Mimi Dwyer, *Federal Agents March Through L.A. Park, Spurring Local*  
 26 *Outrage*, N.Y. Times (July 7, 2025), <https://www.nytimes.com/2025/07/07/us/la-macarthur-park-immigration.html>.

27                   <sup>5</sup> *Id.*

28                   <sup>6</sup> See Leo Stallworth, *Federal agents conduct operation in Little Tokyo as Newsom announced redistricting plans*, KABC (August 14, 2025), <https://abc7.com/post/federal-agents-conduct-redistricting-plans>.

1 strawberries nearby. CBP Sector Chief Gregory Bovino, who was personally on the scene, re-  
 2 jected any suggestion that he and other agents had engaged in “a provocative act” to counter  
 3 Newsom’s press conference (about a ballot measure to redraw the state’s congressional dis-  
 4 tricts).<sup>7</sup>

5 **2. In September 2025, agents raid an apartment building on the South  
 6 Side of Chicago.**

7 21. In early September 2025, ICE began a large-scale deportation operation in the  
 8 Chicago area that it calls “Operation Midway Blitz.”<sup>8</sup> The raid has resulted in thousands of  
 9 arrests and extensive public scrutiny.

10 22. As part of that campaign, on or about September 30, 2025, ICE and other fed-  
 11 eral agents raided an entire apartment building on the South Side of Chicago.

12 23. The agency claimed to be targeting alleged gang members, but after storming  
 13 the building—from a street-level assault and by rappelling down to it from helicopters—they  
 14 allegedly detained residents and removed them from their homes without regard for alleged  
 15 gang affiliations or, for that matter, their citizenship status.<sup>9</sup>

16 \_\_\_\_\_  
 17 [operation-little-tokyo-los-angeles-outside-venue-where-newsom-announced-redistricting-plans/17537756/](https://www.latimes.com/california/story/2025-08-14/border-patrol-conducts-immigration-operation-outside-gov-newsom-event); Connor Sheets, *et al.*, *Border Patrol agents stage show of force at Newsom’s ‘big beautiful press conference,’* L.A. Times (Aug. 14, 2025); <https://www.latimes.com/california/story/2025-08-14/border-patrol-conducts-immigration-operation-outside-gov-newsom-event>.

20 <sup>7</sup> *Id.* (“Bovino told reporters in Little Tokyo that agents were out conducting ‘roving pa-  
 21 trol duties.’ He acknowledged that agents had detained one person and said, ‘we will patrol  
 22 anywhere in Los Angeles.’ Asked if their presence just happened to coincide with Newsom’s  
 23 press conference, Bovino said, “breaking the law is not coincidental.””).

24 <sup>8</sup> *ICE Launches Operation Midway Blitz in Honor of Katie Abraham to Target Criminal Ille-  
 25 gal Aliens Terrorizing Americans in Sanctuary Illinois*, U.S. Dep’t of Homeland Sec. (Sept. 8,  
 26 2025), <https://www.dhs.gov/news/2025/09/08/ice-launches-operation-midway-blitz-honor-katie-abraham-target-criminal-illegal>.

27 <sup>9</sup> See, e.g., Cindy Hernandez, *Massive immigration raid on Chicago apartment building leaves*  
 28 *residents reeling: ‘I feel defeated’*, Chicago Sun-Times (Oct. 1, 2025), <https://chicago.suntimes.com/immigration/2025/10/01/massive-immigration-raid-on-chicago-apartment-building-leaves-residents-reeling-i-feel-defeated> (“Watson said she saw agents dragging residents, including kids, out of the building without any clothes on and into U-Haul vans.”); Rebekah Riess Bill Kirkos, *37 people arrested and American kids separated from parents after ICE raid at*

1           24. As with other enforcement actions, the federal agents had cameras rolling to  
 2 capture their assault on the apartment building at 7500 S. South Shore Drive. Within two  
 3 days, the Department of Homeland Security posted a promotional video of the raid to its offi-  
 4 cial X account. In the approximately one-minute video, dramatic background music and heli-  
 5 copter sound effects play over footage of, among other things, federal agents climbing ladders  
 6 over a short fence and marching various shirtless, handcuffed, and non-white men around the  
 7 building grounds.

8           25. As they have in other cities, the administration’s Chicago deportation opera-  
 9 tions have led to legal claims against multiple ICE and CBP officials, among other Trump Ad-  
 10 ministration officials and agencies, accusing them of a raft of unlawful conduct as agents  
 11 “conducted military-style raids on civilian apartment complexes, terrorizing residents, in-  
 12 cluding children, and demolishing personal property.”<sup>10</sup>

13           26. In one case, U.S. District Judge Sara L. Ellis issued an order finding that the  
 14 administration’s descriptions of ICE enforcement actions were frequently disproved by the  
 15 government’s own video footage, concluding that the footage showed “the opposite” of the  
 16 government’s contention “that agents acted in line with the Constitution, federal laws, and  
 17 the agencies’ own policies on use of force when engaging with protesters, the press, and reli-  
 18 gious practitioners.”<sup>11</sup>

19           **B. The agencies frequently record their deportation activity to post promo-**  
 20 **tional footage and to promote transparency into agency operations.**

21           27. Much of the footage discussed in Judge Ellis’ order and submitted by the gov-  
 22 ernment in that case derived from federal agents’ body-worn cameras (“BWC”).

23  
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 25           *Chicago apartments*, CNN (Oct. 3, 2025), [https://www.cnn.com/2025/10/03/us/chicago-](https://www.cnn.com/2025/10/03/us/chicago-apartment-ice-raid)  
 26 [apartment-ice-raid](https://www.cnn.com/2025/10/03/us/chicago-apartment-ice-raid) (“Adults and children alike were pulled from their Chicago apartments,  
 27 crying and screaming, during a large overnight raid that has left tenants and neighbors  
 28 shaken.”).

29           <sup>10</sup> See Compl., *Chicago Headline Club, et al. v. Noem, et al.*, No. 25-cv-12173 (N.D. Ill. Oct.  
 30 6, 2025).

31           <sup>11</sup> See *Chicago Headline Club v. Noem*, No. 25 C 12173, 2025 WL 3240782, at \*3 (N.D. Ill.  
 32 Nov. 20, 2025).

1           28. As a matter of ICE policy, agents who wear such cameras should generally activate them to record operations “as soon as practicable at the beginning of an Enforcement Activity” and deactivated “when the activity is concluded.”<sup>12</sup>

4           29. A substantial reason ICE has asserted for its BWC policy is that video footage of agency actions may “promote public trust; enhance service to the community by accurately documenting events, actions, conditions, and statements made by encountered individuals; and increase officer and public safety, accountability, and transparency.”<sup>13</sup>

8           30. Given the extent of ICE activity in campaigns like “Operation Midway Blitz,” the amount of BWC footage agents capture can be substantial. For example, in *Chicago Headline Club*, Judge Ellis noted that the government had submitted “hours and hours of” such footage, which recorded agent activity from at least September 19, 2025, through mid-October 2025.<sup>14</sup>

13           31. In addition to capturing footage through BWC, ICE often engages special production crews to accompany its agents on certain missions. For at least 15 years the agency has operated a program to record certain operations in way that “feature[s the] gripping, action-packed work that ICE does to protect the public and national security.”<sup>15</sup>

17           32. Under that program, videographers employed or contracted by ICE (or other components of the U.S. Department of Homeland Security) regularly accompany agents dur-

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22           <sup>12</sup> See ICE Directive 19010.3: Body Worn Camera (BWC) (Feb. 19, 2025),  
23           <https://www.ice.gov/doclib/foia/policy/19010.3.pdf>.

24           <sup>13</sup> *Id.*

25           <sup>14</sup> See *Chicago Headline Club*, 2025 WL 3240782, at \*3; see also Defs’ Notice of Witnesses and Exhibits, *Chicago Headline Club, et al. v. Noem, et al.*, No. 25-cv-12173 (N.D. Ill. Nov. 4, 2025). The footage filed in that case included some BWC footage captured from earlier ICE and CBP operations in Los Angeles. See, e.g., Jesus Jimenez, ‘It’s All About Us Now’: Video Shows Bovino’s Orders to Agents in L.A. Raids, N.Y. Times (Jan. 29, 2026), <https://www.nytimes.com/2026/01/29/us/bovino-orders-video.html>.

26           <sup>15</sup> See ICE, ICE, CAMERA, ACTION!, ICE.gov, <https://www.ice.gov/topics/ice-camera-action>.

1       ing ICE Enforcement and Removal Operations (“ERO”) operations. These ride-along practices result in the creation of extensive multimedia records capturing encounters between  
2       ICE agents and others.

4           33.      ICE has thus created hundreds of videos documenting ERO actions.<sup>16</sup>

5           **C.      CIR requests public records from ICE and CBP relating to the Los Angeles and Chicago operations.**

7           **1.      CIR requests records relating to the Chicago raid.**

8           34.     On October 3, 2025, CIR submitted separate FOIA requests to ICE and to  
9       CBP seeking disclosure of certain public records “concerning immigration enforcement ac-  
10      tions in Chicago, Illinois between September 30-October 2.” *See* Exs. 1-2. In particular, CIR  
11      asked the agencies to disclose (1) unedited video and audio recordings of the operations, (2)  
12      judicial and administrative warrants relating to the raids, (3) affidavits or sworn declarations  
13      to obtain any warrants, (4) all incident reports, arrest reports, and use of force reports, (5)  
14      rosters of people detained from each enforcement action, including the charge or immigration  
15      status, (6) records identifying certain details of a particular raid undertaken at 7500 S. South  
16      Shore Drive in Chicago, and (7) ICE policies, general orders, or list of protocols that direct  
17      how agents conduct such operations. *Id.*

18           35.     CBP acknowledged receipt of CIR’s FOIA request on October 6, 2025.

19           36.     As of the filing of this Complaint, and despite the requirements of 5 U.S.C. §  
20      552(a)(6)(A)(i), CBP has not notified CIR of the scope of documents that it will produce or  
21      the scope of documents that it plans to withhold in response to CIR’s FOIA request.

22           37.     ICE acknowledged receipt of CIR’s FOIA request on December 1, 2025, and  
23      claimed that the requested material “is under the purview of” CBP on December 8, 2025.

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26           <sup>16</sup> “ICE, Camera, Action?” *Exposing ICE’s Filming Operations*, Stanford Law School Im-  
27      migrants’ Rights Clinic (last updated Jul. 8, 2025), [https://law.stanford.edu/immigrants-  
28      rights-clinic/ice-camera-action-exposing-ices-filming-operations/](https://law.stanford.edu/immigrants-rights-clinic/ice-camera-action-exposing-ices-filming-operations/) (“Takeaway #1: A review  
of the records produced by the agency reveals that ICE treats enforcement operations as op-  
portunities to capture footage for public consumption.”).

1           38. As of the filing of this Complaint, and despite the requirements of 5 U.S.C. §  
 2 552(a)(6)(A)(i), ICE has not notified CIR of whether—notwithstanding its assertion that  
 3 CBP has “purview of” the records—ICE possesses public records responsive to CIR’s re-  
 4 quest or the scope of material that ICE will produce or withhold in response to the FOIA re-  
 5 quest.

6           **2. CIR requests records relating to the Los Angeles operations.**

7           39. On December 3, 2025, CIR submitted separate FOIA requests to ICE and to  
 8 CBP seeking disclosure of “unedited video and audio recordings,” created by the agencies  
 9 themselves or by contractors or other entities receiving agency funds, that relate to three op-  
 10 erations carried out in Los Angeles. *See* Exs. 3–4. In particular, CIR asked for disclosure of  
 11 such recordings that relate to agency operations (1) carried out on June 12, 2025, in or near  
 12 Huntington Park, (2) carried out on July 7, 2025, in or near MacArthur Park, and (3) carried  
 13 out on August 14, 2024, near the Japanese American History Museum. *Id.*

14           40. ICE acknowledged receipt of CIR’s FOIA request on December 29, 2025.  
 15 CBP has not acknowledged the request, but on information and belief received it on or about  
 16 December 3, 2025.

17           41. As of the filing of this Complaint, and despite the requirements of 5 U.S.C. §  
 18 552(a)(6)(A)(i), neither agency has notified CIR of the scope of documents that it will pro-  
 19 duce or the scope of documents that it plans to withhold in response to CIR’s FOIA request.

20           **CAUSE OF ACTION**

21           **Count I—Declaratory and Injunctive Relief**

22           **(Violation of FOIA, 5 U.S.C. § 552)**

23           42. CIR re-alleges and incorporates by reference the previous paragraphs as if fully  
 24 set forth in this paragraph.

25           43. CIR’s FOIA requests to Defendants were properly made and submitted and  
 26 seek disclosure of agency records within Defendants’ control.

27

28

44. Defendants are agencies subject to the FOIA, and they have failed to provide CIR the required “determination” within the meaning of the FOIA in the timeframe required by law.

45. Defendants have also failed to disclose any public records responsive to CIR's FOIA request.

46. There is no lawful basis for Defendants to withhold, in whole or in part, the records CIR has requested.

## PRAYER FOR RELIEF

CIR accordingly asks that the Court:

A. Provide for expeditious proceedings in this action;

B. Declare that the documents sought by their FOIA request, as described in the following paragraphs, are public under 5 U.S.C. § 552 and must be disclosed;

C. Declare that Defendants violated the FOIA by failing to provide the determination required by law within the timeframe specified by the FOIA;

D. Declare that Defendants violated the FOIA by failing to provide the public records responsive to CIR's FOIA requests;

E. Enter an injunction, pursuant to 5 U.S.C. § 552(a)(4)(B), directing Defendants to make the requested public records available to CIR, unredacted, and without further delay, and setting a deadline for compliance;

F. Award CIR its costs and reasonable attorneys' fees incurred in this action pursuant to 5 U.S.C. § 552(a)(4)(E); and

G. Grant CIR such other and further relief as this Court may deem just and proper.

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2  
3 Dated: February 5, 2026

*/s/ Matthew S.L. Cate*

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