

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

ELINOR HILTON, COLLEEN FAGAN,
POLYXENIA PANTOS, and CARLYN WILLIAMS,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

MARKWAYNE MULLIN, Secretary of the U.S.
Department of Homeland Security; TODD LYONS,
Acting Director, U.S. Immigration and Customs
Enforcement; JOHN A. CONDON, Acting Executive
Director, Homeland Security Investigations;
RODNEY SCOTT, Commissioner, U.S. Customs and
Border Protection; MICHAEL BANKS, Chief, U.S.
Border Patrol; THE U.S. DEPARTMENT OF
HOMELAND SECURITY; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT; HOMELAND
SECURITY INVESTIGATIONS; U.S. CUSTOMS
AND BORDER PROTECTION; U.S. BORDER
PATROL; UNIDENTIFIED FEDERAL AGENCIES;
and UNIDENTIFIED FEDERAL AGENTS,

Defendants.

Case No. 26-cv-00092-JAW

DECLARATION OF CORINNE JAGGER

I, Corinne Jagger, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Corinne Jagger. I am over 18 years of age and a resident of Saco,
Maine.

2. On March 22, 2026, my husband called me to let me know that he and our teenage daughter were driving in our minivan when they encountered a vehicle in Biddeford, a neighborhood near ours that has a large immigrant population that appeared to be driven by an ICE agent. My husband called me during this interaction to let me know what was happening, which included that he was observing the ICE vehicle from Biddeford into Saco, a distance of about 2 miles, before they pulled into a parking lot. He said the ICE agent then followed our minivan for several miles until they pulled into a restaurant to let it pass but that it blocked them in the parking lot. He and my daughter were describing how unnerving it was to be followed and intimidated by ICE in this way.

3. On June 28, 2026, my husband and I were driving in the same vehicle that my daughter and husband had been driving on March 22, 2026. We were in Biddeford when we observed a white Ford SUV with front windows tinted extremely dark that appeared to be an ICE vehicle. The vehicle was idling on the side of Mason Street. We passed the ICE vehicle, crossed a thoroughfare, pulled over on the opposite side of the street, and took pictures of the vehicle with my cellular phone.

4. The reason we took pictures of the vehicle is because we wanted to notify the ICE hotline that ICE was in the neighborhood. We believe it is important to document ICE activity in an attempt to keep our neighbors safe.

5. The ICE agent driving the vehicle pulled away. We followed the vehicle at a safe distance, obeying all the traffic laws. We think it is important to follow ICE vehicles in order to observe and record any interactions law enforcement has with the public, to report their locations so that someone would be able to observe their activities, and to hold them accountable for any

abuses. I think it is important to make sure that there is someone present to bear witness, document activity, and help our impacted neighbors.

6. After a mile or so, the ICE agent jumped out of his vehicle at a stop sign and used his cell phone to photograph or record the front of our vehicle, which includes our vehicle's license plate. He was not in a uniform. He then got back into his vehicle and drove directly to our home.

7. The ICE agent parked his vehicle in front of our home. At the time, we did not know how he knew where we lived, but assumed he used our license plate information to gain access to our home address which he then used to drive us to our home and park outside. This further confirmed that he was a federal agent or law enforcement.

8. We pulled up behind the ICE vehicle, but were terrified to get out of our car. Our teenage children were in the home. I did not know what trauma my kids might see given the violence and aggression that ICE agents have been recorded engaging in. We didn't know if we were going to be confronted, assaulted, arrested, or how things could escalate. There was no reason for the ICE agent to be at our home and just stay parked in front of our house since we had not committed any crime or caused any danger. We were aware of everything that happened in Minnesota, with unarmed protestors getting shot and assaulted. The last thing we want is for our kids to witness any violence or be left without a parent if we got arrested for some reason.

9. We contacted our children and told them to deadbolt the doors and to set a recording device in the window.

10. After approximately 35 minutes, we drove around the ICE agent in hopes that he would leave our home if we left. He did not. We slowly circled the block and when we came back to our address, the ICE agent was still parked in front of our home. This really scared me.

We decided to call the ICE Watch hotline and tell them what was happening. They suggested we call the Saco Police Department and ask for an escort into our home.

11. After the agent remained parked in front of our home for approximately an hour, we reluctantly called the Saco Police Department for an escort into our home. We did this because: 1) someone had jumped out of their vehicle and taken a picture of us then drove us to our home; 2) we didn't feel safe getting out of our car and walking to our home when we didn't know with absolute certainty that this was law enforcement, and 3) if it was a federal agent, we were even more concerned given that there was no reason for him to be parked outside our house if not to escalate the situation into something dangerous for us.

12. This situation was even more frightening because I had heard ICE was taking retaliatory action against other observers, like leading them to their homes and threatening to put them on domestic terrorist watchlists. With ICE inexplicably parked outside of our home, all of this added up to a very intimidating and frightening situation.

13. When the Saco police officer arrived, the agent was still parked in front of our house. The officer spoke with the agent for a few minutes and the agent drove away. The officer approached our vehicle and said, "didn't we have one of these a couple of months ago with federal agents over in Biddeford that came over to Saco on a Sunday?" We didn't know it at the time, but it seems that the officer was referencing the encounter that occurred on March 22, 2026 with my husband and child because: 1) it had occurred on a Sunday, 2) a few months ago, and 3) involved federal agents that drove, with our car following, from Biddeford into Saco.

14. The officer asked how he could help and we explained that we did not feel safe going into our home because an unknown person had taken a picture of our license plate and then drove to our home and parked in front of our house to intimidate us and our family. We

explained that our children were in the house and we wanted to make sure we could safely get into our house. The officer asked if we had followed “the agents in Biddeford or Saco” and said that “you can follow them, that’s your right.”

15. Based on the officer referencing “one of these [incidents] with federal agents” and asking if we were “following the agents,” telling us that we were within our rights to follow federal agents, and asking if we “had stumbled upon an [ICE] operation,” the police officer confirmed our suspicion that the driver was an ICE agent who had led us to our home and parked in front of it for over an hour.

16. Later, we looked at police dispatch logs available on the Saco Police Department website and they seemed to confirm that ICE had, indeed, contacted our local police department on March 22, 2026 when my husband and daughter had followed them for a short distance. The log showed that 6 minutes after my husband and daughter encountered the ICE agent in Biddeford, there was a call to “Assist Other Agency” on Elm Street, right where my husband said our vehicle would have been when observing the ICE agent.

17. The fact that we were on our local police’s radar as a result of legally driving behind a suspected ICE vehicle for a few miles is very concerning. We rely on our local police and now ICE is putting us on their radar when we have not done anything illegal. We don’t trust what federal agents have relayed to our local police and I feel less safe now.

18. I believe that the ICE agent was sending us a message by driving us home, and that message was that ICE knows where we live. Together with the message ICE has sent to other community members observing their public activities that they have a database and that they consider observers to be Domestic Terrorists. These combined messages add up to our

feeling like we've been identified as an "enemy" of our government. That messaging is effective at deterring people, including me, from exercising their rights.

19. The agents' actions were clearly intended to intimidate us, and it worked. I am less likely to record or observe federal agents and more anxious to protest out of fear of being put on a watch list. It makes my husband and I think twice before we observe or protest together, because if we both get arrested or attacked by ICE our kids would not have a parent. We would like to protest or observe together because we feel safer together. But, we've had to have conversations about the risks based on the message sent by ICE to us in leading us home, and the additional messages that ICE sent to the community by doing the same thing to others and putting them on watchlists. As a result, we have talked to friends, a relative, and our children about what to do if something were to happen to us based on observing ICE, and usually observe separately.

20. I stopped observing ICE activities after this happened. However, after the murder by ICE of an unarmed immigrant in Biddeford in July, 2026, I have cautiously started observing again and now do so less than I would have.

21. Although I am nervous and anxious to observe and record ICE as a result of their intimidation, I believe it is vitally important to do so because of the gravity of what is happening to people, including my neighbors. Like my husband, I feel it is important to make sure someone is there to document ICE activities to counterbalance any false narrative that ICE puts out, and to notify ICE Watch and other organizations so that they can help support families impacted, and to hold ICE accountable for abuses.

22. The agent's actions in driving to our home was clearly intended to intimidate us, and it worked. He sent the message that he knows where we live, what car we drive, and I fear

what will happen if we are seen as a ‘repeat’ observer. As a result, I am less likely to observe ICE vehicles. I fear that my husband and I are, or will, end up in a federal database or “watchlist” and that we are, or will be, listed as “domestic terrorists” or other label that can be used against us at some time in the future.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 9, 2026.

/s Corinne Jagger