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 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. 2:26-cv-00092-JAW

DECLARATION OF SHELBY CARVER

I, Shelby Carver, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a current resident of Lewiston, Maine.

2. I am deeply opposed to the administration's immigration enforcement tactics, and

I have watched in horror as ICE activity has torn families apart in my country and community.

Because of these beliefs, I feel passionately about bearing witness to immigration enforcement activity in my community.

3. I live in downtown Lewiston, in a very diverse neighborhood. In January of 2026, we were starting to notice a lot of ICE activity. The downtown area was starting to get locked down because people were afraid to go to work and come out of their homes. In response, the community started organizing and identifying various ways to help neighbors. I decided to help by getting involved in observing and recording ICE activity, which includes safely driving behind ICE vehicles in order to ensure that detentions and abuses are observed and recorded. Doing so hopefully creates accountability, helps identify those who are taken by ICE, helps families of detained individuals know what happened to their loved ones, and might deter abuse.

4. On Thursday, January 22, 2026, I heard that ICE was in my neighborhood. Around 12:20 p.m, I observed a black SUV with dark tint that had a cage in the back. This vehicle was clearly an ICE vehicle.

5. I drove behind the ICE vehicle at a safe distance and speed for approximately 2-5 minutes before the vehicle pulled over on the side of the road on Pine Street. The reason I drove behind ICE was to observe and record any law enforcement actions taken by ICE agents when they stopped moving. I looked inside when I passed the vehicle and saw an agent wearing tactical gear. The agent had his phone up and appeared to be filming me and my vehicle with a cell phone as I passed.

6. I pulled over and waited for the vehicle to start moving again. Once it did, I resumed driving behind the vehicle at a safe distance, obeying all traffic laws. The agent driving this ICE vehicle drove directly to my home, which is on a corner. He turned at that corner and kept driving, which – at first – was a relief because I thought the agent knew where I lived and

was leading me home which would have been scary. However, the ICE agent circled past my home three times to let me know, in fact, he had driven me home.

7. I live on a very small, triangular block. From my house to the end of the block, where a car would have to turn right or left, is only about 50 feet. A right turn and an immediate right brings you right back to my house, which is a total of only about 550 feet. When the ICE agent passed my house the first time, I continued driving behind. The agent followed this tiny 550-foot grid and drove back to my home again, which increased my anxiety and fear. When the ICE agent followed this tiny 550-foot grid again to drive past my home for the third time, it confirmed for me that the agent had, in fact, led me to my home and was sending me a message. The message this sent to me was that the ICE agent knew I was observing him, had the power to find out where I lived, and that I better stop observing ICE activities or else.

8. I believe the ICE agent driving the vehicle learned my home address by running my license plate and led me to my home in order to intimidate me. This was incredibly scary and intimidating. It was also successful. I immediately discontinued my efforts to observe the ICE agent's actions. I called my partner, shaken up by the fact that agents knew where I lived.

9. Although I was unnerved by the interaction, I still wanted to help my community. The next day, January 23, 2026, when I heard about ICE activity in my neighborhood, I decided to park my car in front of a mosque on Bartlett Street in Lewiston to send a message of solidarity to my immigrant neighbors and hopefully help protect the community. I hoped my presence – as a white woman with a camera – would deter any immigration enforcement and allow my neighbors to worship. If I witnessed any enforcement activities, I could observe and record it. Around 1:40 p.m., I saw a Dodge Ram with very dark tinted windows and Maryland license plates drive past the mosque. Because this vehicle seemed to be an ICE vehicle, I cautiously

decided to drive behind it and did so safely, at or below the speed limit, and from a reasonable distance.

10. I drove behind the vehicle for about 3-5 minutes before we passed two Lewiston Police Department (LPD) cars that were parked in a parking lot. As we drove past, one of the police cars pulled out of the parking lot and started driving behind me. It did not activate its lights, but this scared the daylights out of me. I feared the local police were working with ICE and decided I would stop observing the ICE vehicle and just drive home to avoid any trouble or hassle.

11. With the ICE vehicle in front of me and the local police car behind me, I drove the half a mile toward my home. We drove all the way up Pine Street, going less than 20 MPH, and when we got to the street I live on, the ICE vehicle in front of me turned onto my street and stopped in front of my house. When I turned onto my street, the LPD officer turned on his lights. I pulled over and stopped in front of my house behind the ICE agent. It was apparent that these law enforcement were working together and had driven me to my home. Three other vehicles immediately showed up—two more ICE vehicles, at least one with their red and blue lights activated, and one more LPD vehicle.

12. Several agents and officers approached my vehicle. My dog started barking from inside the house, and my partner came outside and began to film the encounter. I was too panicked to film myself.

13. The police officer approached my car first and asked for my license and registration. The ICE agents then appeared at my window, including an agent wearing a vest that said POLICE HSI. I said something along the lines of, ‘I was just driving home,’ and the agent responded along the lines of, ‘We brought you home.’

14. The agent's statement confirmed that ICE had looked up my address and intentionally led me to my house. I had not provided the ICE agents with my name, address, or identification at any point.

15. The HSI agent also said to me and my partner, "So you both know you're being videorecorded as well." This statement seemed to be a threat of some kind. There was no reason for a federal agent to participate in, let alone record and keep a video recording, of a traffic stop by a local police officer.

16. The HSI agent then said, "He's going to take care of your local problem here. But if you continue to follow my agents, I will contact a magistrate and we will issue an arrest warrant." When I asked what law I had broken, he said "18 U.S.C. 111." He repeated the statute and said "you can look it up."

17. After that, the federal agents asked the police officers if they were good to go, and left the scene. When the police officer came back to my car window, he told me that there was some kind of administrative problem with my car registration. I showed him proof that I had, in fact, registered this car and received a new license plate for it. He issued me a warning and told me to work it out with the DMV. I asked what I had done wrong to get pulled over. He said that I had not done anything wrong, that he was eating lunch and just decided to run my plate when I passed. I doubted the truthfulness of this answer and strongly suspected that he had been contacted by ICE to follow behind me as they led me to my home because: 1) if he had identified a reason to pull me over, he would have done so as soon as he pulled behind me – not half a mile later and in front of my home in coordination with ICE vehicles; and 2) I highly doubt three ICE vehicles filled with federal agents and two local police cars would show up for a clerical error that the DMV made.

18. I was terrified after these two ICE-related incidents. For months after the agents led me home and clearly demonstrated they know who I am and where I live, I had intrusive thoughts and nightmares about ICE busting into our home in retaliation. For several weeks, I felt uncomfortable when I was home by myself. I feared they would create a false narrative that I had done something illegal, even though I had not. Because I am a mental health professional, I was worried that I would miss appointments with mental health clients who depend on me and need me to be there for them if I was detained or arrested for observing ICE activities. I stopped following ICE for many months.

19. Although I have since resumed trying to help my community by observing ICE activities, I only observe stationary ICE vehicles and do not follow them even though this allows them to engage in activities without transparency or accountability. I would like to follow them to observe but I am afraid to do so based on their intimidating actions in driving me to my home to send a message.

20. It is quite a statement to say that I am afraid of my government, but it's now true – especially federal agents. I am afraid to express opposition and share messages by blowing a whistle or honking to alert others that ICE is present, I am afraid to follow them, and I am nervous to record them. It makes me angry and sad that federal agents are able to intimidate me, and others, out of fear of retaliation. It makes me feel powerless.

21. Since these encounters, ICE activity has continued in Lewiston. The overall level of activity has decreased as compared to January, but agents continue to be visible and engage in enforcement actions in which people are snatched off the street or elsewhere and families are left to wonder and worry about their whereabouts and safety. The last time I engaged in observing

was on September 9, 2026. On that date, I observed four or five ICE vehicles staking out or otherwise looking for suspected immigrants in my community.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 15, 2026.

/s/ Shelby Carver
Shelby Carver