

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Ernest McGeachy, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) with the United States Department of Homeland Security, Immigration and Customs Enforcement/Homeland Security Investigations (HSI), in Portland, Oregon. HSI is responsible for enforcing the customs laws, immigration laws, and federal criminal statutes of the United States. I am a law enforcement officer of the United States, and I am authorized by law to conduct investigations and to make arrests for felony offenses. I have been a federal law enforcement officer for over 20 years.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for Summer SHEPHERD, for Assault on a Federal Officer in violation of 18 U.S.C. § 111(a)(1). As set forth below, there is probable cause to believe, and I do believe, that SHEPHERD committed Assault on a Federal Officer in violation of 18 U.S.C. § 111(a)(1).

3. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, my review of records related to this investigation, communication with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a complaint and an arrest warrant, it does not set forth each fact that I or others have learned during this investigation

Applicable Law

4. Title 18 U.S.C. § 111(a)(1) makes it an offense to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in 18 U.S.C. § 1114 while engaged in or on account of the performance of official duties. Persons designated in § 1114 include any officer or employee of the United States or of any agency in any branch of the United States government while such officer or employee is engaged in or on account of the performance of official duties, and any person assisting such an officer or employee in the performance of official duties. Under § 111(a), simple assault is a misdemeanor, but where the assaultive acts involve physical contact with the victim, the offense is a felony punishable by imprisonment up to 8 years. 18 U.S.C. § 111(b) provides an enhanced penalty of up to 20 years' imprisonment when, in the commission of any acts described in subsection (a), a dangerous or deadly weapon is used, or bodily injury is inflicted. The statute does not define "bodily injury" however 18 U.S.C. § 1365(h)(4) has been interpreted to define bodily injury to mean: (A) a cut, abrasion, or bruise, (B) physical pain, or (C) any other injury to the body, no matter how temporary.

Statement of Probable Cause

5. On the morning of November 23, 2025, Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) teams had arrested an individual illegally present in the United States in a parking lot in Tigard, Oregon. Adult Victim 1 (AV1) provided a statement and reported that:

6. AV1 was in full tactical gear with "POLICE" patches on the front and back of their vest and AV1's badge was visible. Summer SHEPHERD drove up to AV1's location in a Chevy Tahoe. SHEPHERD stepped out of the vehicle and rushed over to AV1 while screaming

and yelling, “What the fuck are you doing here?! Fuck you ICE! Get the fuck out of my city!”

AV1 put out their left arm out prevent SHEPHERD from getting too close while verbally telling SHEPHERD to “Stay back, away from us.” SHEPHERD used both hands and pushed AV1’s chest, causing AV1 to stumble back in order to not fall down onto the ground. AV1 drew pepper spray and gave verbal command for SHEPHERD to “step back,” to which SHEPHERD complied, while continuing to scream and yell at the agents.

7. AV1 to walked back to his government vehicle, got into the passenger side, and closed the door. SHEPHERD then proceeded to ram the passenger side of the government vehicle with their hands, where AV1 was sitting, causing a dent to the upper portion of the door (photo below).



8. SHEPHERD then yanked open the passenger door where AV1 was sitting, causing AV1 to put out their left arm out to prevent SHEPHERD from coming further into the front passenger side. While AV1's left arm was out, SHEPHERD slammed the car door back striking AV1's left arm. At that point AV1 opened the door and deployed department issued pepper spray (Saber Red) to SHEPHERD's upper forehead and eyes. SHEPHERD then slammed the passenger car door again. With the help of additional officers, SHEPHERD was pulled down to the ground to where SHEPHERD continued to resist until handcuffed.

9. AV1 suffered a bruise on the left forearm, scuff marks on their left knuckles, and redness on the knuckles. AV1 also reported numbing pain going down the left arm after the incident.

10. Adult Witness 1 (AW1), a federal law enforcement officer at the incident, reported seeing SHEPHERD rush AV1 and strike AV1 in the chest. AW1 drew their taser at SHEPHERD who then took several steps back. AW1 reported that SHEPHERD then rushed the vehicle and struck the passenger a door.

Conclusion

11. Based on the foregoing, I have probable cause to believe, and I do believe, that SUMMER SHEPHERD committed Assault on a Federal Officer in violation of 18 U.S.C. § 111(a)(1). I therefore request that the Court issue a criminal complaint and arrest warrant for SUMMER SHEPHERD.

12. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Pamela Paaso, and AUSA Paaso advised me that in her opinion the affidavit and complaint are legally

and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

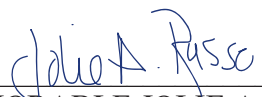
Request for Sealing

13. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may cause destruction of or tampering with evidence or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

By phone pursuant to Fed. R. Crim. P. 4.1
ERNEST MCGEACHY
SA, Homeland Security Investigations

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at

5:05 ~~a.m.~~/p.m. on November 23, 2025.



HONORABLE JOLIE A. RUSSO
United States Magistrate Judge