

3:25-mj-00292

DISTRICT OF OREGON, ss: AFFIDAVIT OF GRANT BRILL

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, GRANT BRILL, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am employed as a Special Agent with the Federal Protective Service (FPS), assigned to the Region 8 Investigations Branch in Denver, Colorado. I have been an Agent with the FPS since December 2023. As part of my daily duties as an FPS Special Agent, I investigate general crimes. I graduated from the Federal Law Enforcement Training Center's Criminal Investigator Training Program and have worked in federal law enforcement since 2012. I have experience investigating crimes against federal employees and federal property, including threats and assaults on federal government employees.

2. I submit this affidavit in support of a criminal complaint and arrest warrant for SAMUEL A. WESTCOTT assault on a Federal Officer, in violation of 18 U.S.C. § 111(a)(1). As set forth below, I have probable cause to believe that SAMUEL A. WESTCOTT committed the crime of 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

Affidavit of Grant Brill

that I or others have learned during this investigation.

Applicable Laws

4. 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. Assaulting a federal officer which results in bodily injury is punishable by up to 20 years' imprisonment. 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. Since June 4, 2025, protests have occurred at the United States. Immigration and Customs Enforcement (ICE) Portland Field Office located at 4310 South Macadam Avenue in Portland, Oregon. During daylight hours, some of the attendees at the demonstration have harassed both ICE clients and employees by following them with cameras making disparaging remarks and threatening statements, including stating that that they know where the target lives or that they will find the target of the harassment. Many of these individuals dress in all black clothing, commonly referred to as "black bloc." Black bloc can prevent identification of

individual actors by authorities. After nightfall, the attendees generally become more aggressive, damaging personal and government property, and throwing items toward federal law enforcement officers working at the building. The violence toward officers has included discharging pepper spray at officers as well as throwing rocks, trash, and bricks pulled from the ICE facility's driveway.

6. On October 12, 2025, I reviewed Video Surveillance System (VSS) footage of the incident. ICE facility Camera C1-E15 - North Building and body camera footage from officers, as well as officer statements, and learned the following: At approximately 5:00 PM, a crowd of over 200 individuals were gathered to protest on the north side of the ICE facility along South Bancroft Street. Due to the presence of individuals blocking the vehicle entrance, a decision was made to clear the area to ensure the safe passage of vehicle traffic to and from the facility. Department of Homeland Security law enforcement personnel were deployed outside the facility gates to address the obstruction. Before taking action, the Federal Protective Service (FPS) issued warnings using a long-range acoustic device (LRAD), instructing individuals to vacate Federal property and clear the vehicle entrance. The warnings were issued close in time to the agents' efforts to clear the path of travel for the vehicles departing the facility.

7. The adult victim (AV)¹, an FPS Inspector, began physically removing individuals from in front of the driveway and intended path of travel of vehicles, toward South Bancroft Street. While AV was holding the perimeter to allow vehicle traffic to pass, SAMUEL A. WESTCOTT (WESTCOTT) was observed standing alongside other individuals blocking the

¹ The identities of the adult victim and other anonymized law enforcement officers are documented, known to this affiant and will be made available to the U.S. Attorney's Office.

street, in line with the driveway for the ICE facility. AV saw an FPS inspector trying to get WESTCOTT to move back. AV observed WESTCOTT lunging toward another FPS officer (FPSO 1) and making physical contact with FPSO1 with her forearm. AV moved in to assist FPSO1 and a Border Patrol Officer (BPO1) with detaining WESTCOTT for WESTCOTT'S interference with FPSO1.

8. FPSO1 attempted to restrain WESTCOTT, and they both fell to the ground as they struggled. During the struggle, BPO1 pulled WESTCOTT away from AV and, while doing so, WESTCOTT kicked AV in the groin and thigh multiple times (approximately four to five times). WESTCOTT was subsequently taken into custody by AV and BPO1. WESTCOTT was easily identifiable by her camouflage jacket and blue jeans.

9. Video footage shows WESTCOTT resisting officers and kicking AV multiple times. Officers can be heard in the body camera footage ordering WESTCOTT to stop kicking. Below are screenshots of the surveillance.



Image 1. VSS still shot of WESTCOTT in front of ICE vehicle entrance kicking AV.



Image 2. BPO1 body cam still shot of WESTCOTT kicking AV.



Image 3. BPO1 body cam still shot of WESTCOTT kicking AV.



Image 4. BPO1 body cam still shot of WESTCOTT kicking AV.

10. On October 12, 2025, at approximately 5:30 PM, I interviewed AV. AV stated that he and his team deployed from the Portland ICE facility, located at 4310 South Macadam Avenue, at around 5:00 PM to clear the vehicle entrance in front of the facility.

11. AV reported that he intervened to prevent WESTCOTT from interfering with another officer. AV observed WESTCOTT on the ground and resisting attempts by FPSO1 and BPO1 to restrain her. AV moved to assist with restraining arrest WESTCOTT and was kicked four to five times in the thigh and groin by WESTCOTT.

12. BPO1 was interviewed and told this affiant that he assisted in detaining WESTCOTT and confirmed during his interview that he observed WESTCOTT grabbing AV and kicking him repeatedly while being placed under arrest.

12. A review of SAMUEL WESTCOTT's criminal history revealed no arrests or convictions.

Conclusion

13. Based on the foregoing, I have probable cause to believe that SAMUEL WESTCOTT willfully committed Assault on a Federal Officer, in violation of 18 U.S.C § 111. I therefore request that the Court issue a criminal complaint and an arrest warrant for SAMUEL WESTCOTT.

14. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney Parakram Singh, and AUSA Singh advised me that 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.

By phone pursuant to Fed. R. Crim. P. 4.1
Grant Brill
Special Agent, FPS

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 10:13 pm
a.m./p.m. on October 13, 2025 .



HONORABLE Youlee Y. You
United States Magistrate Judge