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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:25-cr-00507-JA

v.

**GOVERNMENT’S SENTENCING
MEMORANDUM**

SUMMER SHEPHERD,
Defendant.

I. Introduction

On November 23, 2025, Defendant Summer Shepherd, a bystander, angrily approached ICE agents while they were finishing an arrest operation. As she approached, she yelled profanities at the agents such as “what the fuck are you doing here!? Fuck you ICE! Get the fuck out of my city! The agents gave verbal commands to Ms. Shepherd to step back and she complied so they could depart. After agents successfully deescalated the situation, they began to depart the scene in their vehicles. Nonetheless, Ms. Shepherd re-approached the departing officers and struck the door of one of the vehicles with a closed fist, causing approximately \$800

of damage to the vehicle, depicted below. For this conduct, the Government requests the Court sentence Ms. Shepherd to 2 years of probation, a special assessment of \$25, and order her to pay restitution for the damage to the vehicle.



II. The Plea Agreement & Guideline Computations

The base offense level for 18 USC §1361 – Depredation of Government Property is 6 pursuant to U.S.S.G. § 2B1.1(a)(2). No specific offense characteristics apply. Pursuant to the plea letter and U.S.S.G. § 3E1.1, the Government will recommend -2 for acceptance of responsibility. This defendant has no prior criminal history and is therefore a criminal history category of I. This results in a guideline range of 0-6 months. Accordingly, the Government is not requesting a custodial sentence in this case.

III. Government's Recommended Sentence

The Government requests the Court impose a sentence of 2 years of probation, subject to the standard special conditions, a \$25 special assessment, and order restitution. The Defendant served in the U.S. Marines and has performed well during pre-trial supervision, with no violations. She has no prior criminal history. Nevertheless, Ms. Shepherd escalated the situation

with officers when they were simply attempting to perform their duties, unrelated to her. After they deescalated the situation, she then reengaged with officers and struck a government vehicle out of anger as they were leaving the scene. A 2-year term of probation will hold Ms. Shepherd responsible for her conduct, while providing accountability and support from the U.S. Probation Office.

IV. Restitution

The Government has not received a victim impact statement (VIS) from the officer who was in the vehicle on the side that Ms. Shepherd struck. If the Government receives any VIS prior to sentencing, copies will be provided to the Court and defense upon receipt to fulfill its statutory obligations under the Crime Victims' Rights Act. *See* 18 U.S.C. § 3771(a)(4) (providing that victims shall have the "right to be reasonably heard at any public proceeding in the district court involving release, plea, [or] sentencing"); 18 U.S.C. § 3771(c)(1) ("Officers and employees of the Department of Justice . . . shall make their best efforts to see that crime victims are notified of, and accorded, the rights described in [18 U.S.C. § 3771(a)]"). Any VIS will be presented on behalf of the victim.

Regarding restitution, the victim is requesting the Court order \$804.50 in restitution based on an estimate obtained from a collision center. *See* Government Ex. 1. The estimate included repairs to other damage to the vehicle sustained independent of the charged incident. The estimate broke down repairs by vehicle part, with time estimates for labor and paint. Defendant admitted to striking the passenger door with her hands. The collision center estimated the repairs to the damage to the right front door shell would require 6 hours of labor as well as 3.1 hours of paint time (including clear coat). The estimate references hourly rates of \$85 per hour for part labor and \$95 per hour for paint. Using these estimates, the government is

requesting \$510 for labor and \$294.50 for paint, totaling \$804.50 for restitution to repair the damage to the vehicle door. Defendant was provided with a copy of the estimate in Volume 1 of discovery.

V. Conclusion

The Government requests this Court impose a sentence of 2 years of probation, a \$25 special assessment, and order Ms. Shepherd to pay restitution for the damage to the government vehicle.

Dated: September 15, 2026

Respectfully submitted,

SCOTT E. BRADFORD
United States Attorney

/s/ Arin C. Heinz
ARIN C. HEINZ, MIB# P80252
Assistant United States Attorney

COLLISION CENTER

Workfile ID:

204dc0f7

Federal ID:

922173502

Elevate Your Ride

Preliminary Estimate**Customer:**

Written By: Collision

Insured:

Policy #:

Claim #:

Type of Loss:

Date of Loss:

Days to Repair: 0

Point of Impact:

Owner:**Inspection Location:****Insurance Company:**

COLLISION CENTER

GOV PAY AND GOV VEHICLE

Repair Facility

Business

VEHICLE

2022 FORD Escape SEL AWD 4D UTV 3-1.5L Turbocharged Gasoline Port/Direct Injection

VIN:

Interior Color:

Mileage In:

Vehicle Out:

License:

Exterior Color:

Mileage Out:

State: WA

Production Date:

Condition:

Job #:

TRANSMISSION

Automatic Transmission

4 Wheel Drive

POWER

Power Steering

Power Brakes

Power Windows

Power Locks

Power Mirrors

Heated Mirrors

Power Driver Seat

DECOR

Dual Mirrors

Privacy Glass

Console/Storage

Overhead Console

CONVENIENCE

Air Conditioning

Intermittent Wipers

Tilt Wheel

Cruise Control

Rear Defogger

Keyless Entry

Message Center

Steering Wheel Touch Controls

Rear Window Wiper

Telescopic Wheel

Heated Steering Wheel

Climate Control

Backup Camera

Parking Sensors

Remote Starter

RADIO

AM Radio

FM Radio

Stereo

Search/Seek

Auxiliary Audio Connection

Satellite Radio

SAFETY

Drivers Side Air Bag

Passenger Air Bag

Anti-Lock Brakes (4)

4 Wheel Disc Brakes

Traction Control

Stability Control

Front Side Impact Air Bags

Head/Curtain Air Bags

Communications System

Hands Free Device

Blind Spot Detection

Lane Departure Warning

SEATS

Bucket Seats

Reclining/Lounge Seats

Leather Seats

Heated Seats

WHEELS

Aluminum/Alloy Wheels

PAINT

Clear Coat Paint

OTHER

Fog Lamps

Rear Spoiler

California Emissions

TRUCK

Power Trunk/Liftgate

11/29/2025 3:23:47 PM

477204

**GOVERNMENT
EXHIBIT****1**

3:25-cr-00507-JA

Page 1

Customer: [REDACTED]

2022 FORD Escape SEL AWD 4D UTV 3-1.5L Turbocharged Gasoline Port/Direct Injection

Line	Oper	Description	Part Number	Qty	Extended Price \$	Labor	Paint
1		FRONT BUMPER & GRILLE					
2	R&I	R&I bumper cover				1.6	
3		FRONT LAMPS					
4	R&I	RT R&I headlamp assy				0.2	
5		FENDER					
6	*	Blnd RT Fender					1.1
7	R&I	RT Fender liner				0.3	
8	R&I	RT Wheel opng mldg black				0.3	
9	R&I	Mud guard				0.4	
10		PILLARS, ROCKER & FLOOR					
11	R&I	RT Rocker molding				0.5	
12		FRONT DOOR					
13	*	Rpr RT Door shell (HSS)				6.0	2.2
14		Add for Clear Coat					0.9
15	*	R&I RT Side molding				0.3	
16	R&I	RT Belt molding black				0.3	
17	R&I	RT Applique w/o keyless pad				0.2	
18	R&I	RT R&I mirror				0.3	
19	R&I	RT Handle, outside primed				0.4	
20		REAR DOOR					
21	*	Rpr RT Door shell (HSS)				2.0	2.2
22		Overlap Major Adj. Panel					-0.4
23		Add for Clear Coat					0.4
24	R&I	RT Side molding				0.3	
25	R&I	RT Applique rear				0.2	
26	R&I	RT Belt molding black				0.3	
27	R&I	RT Handle, outside black				0.4	
28		QUARTER PANEL					
29	*	Blnd RT Quarter pnl assy					1.4
30	R&I	RT Wheel opng mldg				0.3	
31	R&I	RT Qtr glass FORD, chrome frame gray tint				1.6	
32		REAR LAMPS					
33	R&I	RT Tail lamp assy				0.3	
34		REAR BUMPER					
35	R&I	R&I bumper cover				1.5	
36	#	Subl Hazardous waste removal		1	5.00 T		
37	#	Repl Cover Car		1	10.00 X	0.2	
38	#	Repl PreScan		1		0.5 M	
39	#	Repl PostScan		1		0.5 M	
SUBTOTALS					15.00	18.9	7.8

Customer: [REDACTED]

2022 FORD Escape SEL AWD 4D UTV 3-1.5L Turbocharged Gasoline Port/Direct Injection

ESTIMATE TOTALS

Category	Basis		Rate	Cost \$
Parts				0.00
Body Labor	17.9 hrs	@	\$ 85.00 /hr	1,521.50
Paint Labor	7.8 hrs	@	\$ 95.00 /hr	741.00
Mechanical Labor	1.0 hrs	@	\$ 185.00 /hr	185.00
Paint Supplies	7.8 hrs	@	\$ 60.00 /hr	468.00
Miscellaneous				15.00
Subtotal				2,930.50
Sales Tax	\$ 473.00	@	8.7000 %	41.15
Grand Total				2,971.65

FOR YOUR PROTECTION CALIFORNIA LAW REQUIRES THE FOLLOWING TO APPEAR ON THIS FORM. ANY PERSON WHO KNOWINGLY PRESENTS FALSE OR FRAUDULENT INFORMATION TO OBTAIN OR AMEND INSURANCE COVERAGE OR TO MAKE A CLAIM FOR THE PAYMENT OF A LOSS IS GUILTY OF A CRIME AND MAY BE SUBJECT TO FINES AND CONFINEMENT IN STATE PRISON.

THIS ESTIMATE IS FOR REPAIRS TO MEET VEHICLE MANUFACTURER AND INDUSTRY STANDARDS. AS THE CUSTOMER, IT IS YOUR RESPONSIBILITY TO CONTACT THE THIRD-PARTY PAYOR FOR PAYMENT OF THE REPAIRS YOU HAVE AUTHORIZED.

THE FOLLOWING IS A LIST OF ABBREVIATIONS OR SYMBOLS THAT MAY BE USED TO DESCRIBE WORK TO BE DONE OR PARTS TO BE REPAIRED OR REPLACED:

MOTOR ABBREVIATIONS/SYMBOLS: D=DISCONTINUED PART, A=APPROXIMATE PRICE. LABOR TYPES: B=BODY LABOR, D=DIAGNOSTIC, E=ELECTRICAL, F=FRAME, G=GLASS, M=MECHANICAL, P=PAINT LABOR, S=STRUCTURAL, T=TAXED MISCELLANEOUS, X=NON TAXED MISCELLANEOUS. CCC ONE: ADJ=ADJACENT, ALGN=ALIGN, A/M=AFTERMARKET, BLND=BLEND, CAPA=CERTIFIED AUTOMOTIVE PARTS ASSOCIATION, D&R=DISCONNECT AND RECONNECT, EST=ESTIMATE, EXT. PRICE=UNIT PRICE MULTIPLIED BY THE QUANTITY, INCL=INCLUDED, MISC=MISCELLANEOUS, NAGS=NATIONAL AUTO GLASS SPECIFICATIONS, NON-ADJ=NON ADJACENT, O/H=OVERHAUL, OP=OPERATION, NO=LINE NUMBER, QTY=QUANTITY, RECOND=RECONDITION, REFN=REFINISH, REPL=REPLACE, R&I=REMOVE AND INSTALL, R&R=REMOVE AND REPLACE, RPR=REPAIR, RT=RIGHT, SECT=SECTION, SUBL=SUBLET, LT=LEFT, W/O=WITHOUT, W/_=WITH/_ SYMBOLS: #=MANUAL LINE ENTRY, *=OTHER [IE..MOTORS DATABASE INFORMATION WAS CHANGED], **=DATABASE LINE WITH AFTERMARKET, N=NOTES ATTACHED TO LINE. OPT OEM=ORIGINAL EQUIPMENT MANUFACTURER PARTS EITHER OPTIONALLY SOURCED OR OTHERWISE PROVIDED WITH SOME UNIQUE PRICING OR DISCOUNT.

""CURE TIME"" MEANS THE LENGTH OF TIME THAT, PER THE ADHESIVE

Customer: [REDACTED]

2022 FORD Escape SEL AWD 4D UTV 3-1.5L Turbocharged Gasoline Port/Direct Injection

MANUFACTURER, THE WINDSHIELD ADHESIVE NEEDS TO CURE UNTIL THE WINDSHIELD CAN PROPERLY FUNCTION AS A SAFETY DEVICE PURSUANT TO THE FEDERAL MOTOR VEHICLE SAFETY STANDARDS AND THE VEHICLE MANUFACTURER'S SPECIFICATIONS.

Estimate based on MOTOR CRASH ESTIMATING GUIDE and potentially other third party sources of data. Unless otherwise noted, (a) all items are derived from the Guide DR2MK20, CCC Data Date 11/14/2025, and potentially other third party sources of data; and (b) the parts presented are OEM-parts. OEM parts are manufactured by or for the vehicle's Original Equipment Manufacturer (OEM) according to OEM's specifications for U.S. distribution. OEM parts are available at OE/Vehicle dealerships or the specified supplier. OPT OEM (Optional OEM) or ALT OEM (Alternative OEM) parts are OEM parts that may be provided by or through alternate sources other than the OEM vehicle dealerships with discounted pricing. Asterisk (*) or Double Asterisk (**) indicates that the parts and/or labor data provided by third party sources of data may have been modified or may have come from an alternate data source. Tilde sign (~) items indicate MOTOR Not-Included Labor operations. The symbol (<>) indicates the refinish operation WILL NOT be performed as a separate procedure from the other panels in the estimate. Non-Original Equipment Manufacturer aftermarket parts are described as Non OEM, A/M or NAGS. Used parts are described as LKQ, RCY, or USED. Reconditioned parts are described as Recond. Recored parts are described as Recore. NAGS Part Numbers and Benchmark Prices are provided by National Auto Glass Specifications. Labor operation times listed on the line with the NAGS information are MOTOR suggested labor operation times. NAGS labor operation times are not included. Pound sign (#) items indicate manual entries.

Some 2024 vehicles contain minor changes from the previous year. For those vehicles, prior to receiving updated data from the vehicle manufacturer, labor and parts data from the previous year may be used. The CCC ONE estimator has a list of applicable vehicles. Parts numbers and prices should be confirmed with the local dealership.

The following is a list of additional abbreviations or symbols that may be used to describe work to be done or parts to be repaired or replaced:

SYMBOLS FOLLOWING PART PRICE:

m=MOTOR Mechanical component. s=MOTOR Structural component. T=Miscellaneous Taxed charge category. X=Miscellaneous Non-Taxed charge category.

SYMBOLS FOLLOWING LABOR:

D=Diagnostic labor category. E=Electrical labor category. F=Frame labor category. G=Glass labor category. M=Mechanical labor category. S=Structural labor category. (numbers) 1 through 4=User Defined Labor Categories.

OTHER SYMBOLS AND ABBREVIATIONS:

Adj.=Adjacent. Algn.=Align. ALU=Aluminum. A/M=Aftermarket part. Blnd=Blend. BOR=Boron steel. CAPA=Certified Automotive Parts Association. CFC=Carbon Fiber. D&R=Disconnect and Reconnect. HSS=High Strength Steel. HYD=Hydroformed Steel. Incl.=Included. LKQ=Like Kind and Quality. LT=Left. MAG=Magnesium. Non-Adj.=Non Adjacent. NSF=NSF International Certified Part. O/H=Overhaul. Qty=Quantity. Refn=Refinish. Repl=Replace. R&I=Remove and Install. R&R=Remove and Replace. Rpr=Repair. RT=Right. SAS=Sandwiched Steel. Sect=Section. STS=Stainless Steel. Subl=Sublet. UHS=Ultra High Strength Steel. N=Note(s) associated with the estimate line.

Customer:

2022 FORD Escape SEL AWD 4D UTV 3-1.5L Turbocharged Gasoline Port/Direct Injection

CCC ONE Estimating - A product of CCC Intelligent Solutions Inc.

The following is a list of abbreviations that may be used in CCC ONE Estimating that are not part of the MOTOR CRASH ESTIMATING GUIDE:

BAR=Bureau of Automotive Repair. EPA=Environmental Protection Agency. NHTSA= National Highway Transportation and Safety Administration. PDR=Paintless Dent Repair. VIN=Vehicle Identification Number.