

FORMAL CIVIL-RIGHTS GRIEVANCE
REGARDING CBP OPERATIONS AT ROOSEVELT HIGH SCHOOL
Use of Chemical Agents Against Students, Unlawful Detentions, Failure
to Follow Crowd-Control SOP, and Creation of an Unsafe School
Environment

Recipients:

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This grievance concerns the actions of U.S. Customs and Border Protection (CBP) at Roosevelt High School, located approximately three miles from the execution site of Mrs. Renee Nicole Good, occurring only hours after her killing. The proximity in time and location amplifies the foreseeability of harm and community trauma.

CBP officers deployed chemical agents—including tear gas canisters and pepper spray—approximately 20 to 30 feet from the entrance of an active high school while students were present. Teachers were forced to move students back inside, initiating shelter-in-place procedures in the school library. Windows were broken during the operation.

Two to three school officials were reportedly forcibly detained. Officers remained on-site throughout dismissal, rendering the school environment unsafe and prompting the district to cancel all schools for the remainder of the week while immigration enforcement activities continued.

CBP has claimed justification based on an allegation that someone attempted to strike a vehicle. Even if true, such an allegation does not justify deployment of chemical agents against minors or near a school entrance. These actions violated constitutional standards and agency policy.

The conduct described implicates the Fourth Amendment, the Fourteenth Amendment, and established Supreme Court precedent including *Graham v. Connor*, *County of Sacramento v. Lewis*, and *Tinker v. Des Moines*.

This grievance requests an immediate federal investigation, preservation and release of all records, and accountability for violations of constitutional rights and DHS/CBP policy.

APPENDIX A – DHS / CBP USE-OF-FORCE POLICY SUMMARY

The Department of Homeland Security (DHS) and U.S. Customs and Border Protection (CBP) Use-of-Force (UOF) policy establishes that force must be objectively reasonable, necessary, and proportionate to the threat encountered.

Key policy principles include:

1. ****Necessity and Proportionality**** Force may be used only when no reasonable alternatives exist. Chemical agents are considered intermediate force options and are subject to heightened scrutiny.
2. ****Special Care Around Vulnerable Populations**** DHS policy explicitly recognizes children, schools, hospitals, and confined spaces as environments requiring extreme caution. Use of chemical agents in such settings is strongly discouraged due to predictable risk of serious injury or death.
3. ****Crowd-Control Restrictions**** Chemical agents should not be deployed in close proximity to non-involved persons, especially minors, nor in a manner likely to cause panic, trampling, or secondary injury.
4. ****De-escalation Requirement**** Officers are required to use de-escalation tactics whenever feasible and to disengage when enforcement actions create disproportionate risk to the public.
5. ****Medical Aid Obligation**** After any use of force, officers must ensure prompt medical evaluation and treatment for affected individuals.

The deployment of tear gas and pepper spray within 20–30 feet of an active high school entrance, during school hours and dismissal, is inconsistent with these principles and represents a clear deviation from DHS and CBP UOF policy.

This appendix is provided to demonstrate that the actions described were not only unconstitutional but also contrary to the agency's own governing standards.