



MALDEF

The Latino Legal Voice for Civil Rights in America.

National Headquarters

MALDEF Nonprofit Center
634 S. Spring Street, 12th Fl.
Los Angeles, CA 90014
TEL: 213.629.2512
Fax: 213.629.0266

Atlanta

Program Office

34 Peachtree Street, NW
Suite 2500
Atlanta, GA 30303
Tel: 678.559.1071
Fax: 678.559.1079

Chicago

Regional Office

11 East Adams Street
Suite 700
Chicago, IL 60603
TEL: 312.427.0701
Fax: 312.427.0691

Los Angeles

Regional Office

634 S. Spring Street,
11th Fl.
Los Angeles, CA 90014
TEL: 213.629.2512
Fax: 213.629.0266

Sacramento

Program Office

1512 4th Street
Sacramento, CA 95814
Tel: 916.444.3031
Fax: 916.444.7207

San Antonio

Regional Office

110 Broadway
Suite 300
San Antonio, TX 78205
TEL: 210.224.5476
Fax: 210.224.5382

Washington, D.C.

Regional Office

1016 16th Street, NW
Suite 100
Washington, DC 20036
Tel: 202.293.2828

VIA FEDEX AND EMAIL

April 24, 2026

Office of the General Counsel
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave. SE, Mail Stop 0485
Washington, DC 20528
ogc@hq.dhs.gov

Office of the Principal Legal Advisor
Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street, SW, Mail Stop 5900
Washington, DC 20536
OPLAServiceIntake@ice.dhs.gov
OPLA-DCLD-TortClaims@ice.dhs.gov

U.S. Customs and Border Protection
Office of the Chief Counsel
1300 Pennsylvania Avenue, NW, Ste. 4.4-B
Washington, DC 20229
CBPServiceIntake@cbp.dhs.gov

**Re: Claims for Damages under the Federal Tort Claims Act —
Sorayda Noyola**

Dear Sir or Madam:

The Mexican American Legal Defense and Educational Fund, Inc., represents Sorayda Noyola (“Ms. Noyola”) in this claim against the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection and any other federal law enforcement agencies or subagencies (collectively, the “Government Agencies”) involved in the arrest and detention of Ms. Noyola.

Enclosed please find the administrative claim we are filing on her behalf under the Federal Tort Claims Act (the “FTCA”). The claim consists of: (1) a Claim Authorization Form (Exhibit A); (2) a Standard Form 95 for Ms. Noyola

(Exhibit B); and (3) an Attachment to the Standard Form 95 detailing the basis of Ms. Noyola's claim (Exhibit C).

The conduct of agents or officers of the Government Agencies on or about July 23, 2025 meets the elements of several torts enumerated by the FTCA and set forth by Texas tort law. Agents of the Government Agencies unlawfully arrested and detained Ms. Noyola and substantially interfered with her use of property without any grounds for interfering with her liberty, freedom of movement, or property, and the agents did so on legally prohibited grounds. As a direct and proximate result, Ms. Noyola has suffered economic losses, personal injury and emotional distress.

Under 28 U.S.C. § 2675(a) and 28 C.F.R. § 14.2, we provide this notification and claim for damages for injuries caused to Ms. Noyola by agents or officers of the Government Agencies under the FTCA and demand monetary damages in the amount of \$2,502,000 resulting from the tortious conduct of agents of the Government Agencies.

We submit this claim without the benefit of formal discovery. Ms. Noyola reserves the right to amend or supplement her claim.

If any additional information is required to expedite this request, please contact Nina Perales, MALDEF Vice President of Litigation, at nperales@maldef.org.

Sincerely,



Nina Perales
Vice President of Litigation

Encl: Claim Authorization Form, FTCA Standard Form 95, Claim Attachment

FTCA Standard Form 95 – Attachment

Claimant: Sorayda Noyola

We present the information required in Standard Form 95 below, organized by the categories listed on the form, unless otherwise completed in the form submitted with these materials as Exhibit B.

1. Submitted to (“Submit to Appropriate Federal Agency”):

We submit this claim to the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, U.S. Customs and Border Protection, and any other federal law enforcement agencies or subagencies (collectively, the “Government Agencies”) involved in the unlawful arrest, detention, assault, battery, trespass to chattel, and other tortious conduct that agents or officers of the Government Agencies committed against Sorayda Noyola (“Ms. Noyola”).

8. Basis of Claim:

On July 23, 2025, agents employed by the Government Agencies unlawfully restrained and detained Ms. Noyola and her siblings, Claudia Noyola and K.N., all U.S. citizens, in connection with an incident that began near S. Dakota Ave. & Dockberry Rd. in Brownsville, TX 78520.

On July 23, 2025, at approximately 11:00am, Ms. Noyola and her siblings were driving in a car near S. Dakota Ave. & Dockberry Rd. in Brownsville, TX, near their mother’s neighborhood, and noticed unmarked cars and masked individuals who appeared to be law enforcement surrounding a construction site and detaining individuals. Some of the apparent law enforcement agents were wearing masks and some were wearing “HSI” jackets or vests. Ms. Noyola understood these individuals to be federal agents.

Ms. Noyola and her siblings parked their vehicle along a nearby public street and, as they approached on foot along the sidewalk, Ms. Noyola began recording video on her cell phone. While Ms. Noyola and her siblings were at least 15 feet from the agents’ vehicles, an agent immediately approached Ms. Noyola and her siblings, asked what their business was there, and made a comment about Ms. Noyola recording with her cell phone. The agent was wearing a baseball hat, sunglasses and a mask that covered his face. The agent also wore denim pants and a jacket with “HSI” printed on it. He wore a badge on the left side of his jacket that appeared to read “Homeland Security Investigations.” The agent told Ms. Noyola that she was not allowed to record with her cell phone and Ms. Noyola responded that she could record. The agent then told Ms. Noyola that he was going to take her phone because it was part of the investigation. The agent approached Ms. Noyola quickly and Ms. Noyola walked backwards away from the agent. The agent grabbed Ms. Noyola’s arm, which was holding her phone, and held Ms. Noyola’s arm long enough to bruise her arm before releasing her. Ms. Noyola stepped back again and asked the agent not to touch her because he had no reason to do so. Other agents began to surround Ms. Noyola and her siblings. Ms. Noyola asked for the identification of the agent who grabbed her arm but agents did not identify him.

An agent wearing a blue t-shirt displaying the message “I’m surrounded by snowflakes” exited a vehicle and walked up to Ms. Noyola and her siblings. The agent wore a firearm in a holster and had a badge on his hip that appeared to read “Homeland Security Investigations.” Ms. Noyola stated to the “snowflakes” agent that she had been assaulted by an agent who grabbed her arm and that she wanted to file a report with the police.

The “snowflakes” agent immediately told Ms. Noyola and her siblings: “What I’m telling you is that I need to take that phone” and pointed to Ms. Noyola’s phone on which she had recorded video. The “snowflakes” agent continued, “We can put you down on the floor, we can handcuff you, and I’m going to take it either way.” The “snowflakes” agent pointed to Ms. Noyola’s siblings and said “I’m taking that phone and I’m taking that phone.” In the next moment, and without giving Ms. Noyola an opportunity to respond, the “snowflakes” agent yanked Ms. Noyola’s phone from her grasp. Another agent put Ms. Noyola’s hands behind her back. An agent threw Ms. Noyola to the ground. While Ms. Noyola screamed “no” repeatedly, other agents threw Ms. Noyola’s sister and brother to the ground and handcuffed them. Ms. Noyola cried out that they were U.S. citizens and that her brother was a minor. After handcuffing Ms. Noyola’s sister, Claudia, who was 19 years old and petite, agents lifted her and tried to take a picture of her face against her will while mocking her. After throwing down Ms. Noyola’s brother K.N., [REDACTED], agents stepped on K.N.’s knees and legs while he was on the ground.

Agents placed Ms. Noyola and her siblings into separate unmarked vehicles. The agents drove Ms. Noyola to her mother’s house but did not release Ms. Noyola. Instead they continued to detain Ms. Noyola in their car. The agents eventually took Ms. Noyola to the ICE Field Office at 1717 Zoy St., Harlingen, TX. Upon arriving at the ICE Field Office, Ms. Noyola learned from the agents that her sister Claudia was already there. Agents placed Ms. Noyola and her sister into separate cells. Agents did not give Ms. Noyola the opportunity to make a phone call. The agents ultimately held Ms. Noyola and her sister for hours, interrogated them both, and then released them without criminal charges. Agents did not return the cell phones of Ms. Noyola or her sister Claudia.

After arresting him at the construction site, agents placed K.N. into a separate car and interrogated him about whether his mother possessed a social security number and whether she was “illegal.” Agents drove K.N. to his mother’s house and then positioned K.N. outside the fenced yard of the home. Agents stood behind and around K.N. so that he could not walk away from them or go into his house. When K.N.’s mother emerged from the house, agents used K.N. as “bait” and continued to hold him outside the fence, demanding that his mother show her identification. K.N.’s mother, who is a lawful permanent resident of the U.S., asked the agents to identify themselves but they did not. Eventually, the agents released K.N. to his mother.

Based on the foregoing, the agents involved in Ms. Noyola’s violent arrest and detention have engaged in tortious conduct including, but not limited to, false arrest, false imprisonment, assault, and battery, trespass to chattel and conversion, and agents violated Ms. Noyola’s constitutional rights. The agents committed these torts at least in part to intimidate and discourage individuals such as Ms. Noyola from exercising their First Amendment right to document public immigration enforcement operations.

1) False Arrest

The agents involved in Ms. Noyola's detention on July 23, 2025, willfully detained her without authority of law and without her consent. The agents who detained Ms. Noyola lacked reasonable suspicion of an immigration violation or any other offense, and intentionally arrested her and her siblings without a warrant or facts, that if proved, would establish probable cause to believe that she posed a risk of flight before a warrant could be obtained.

Ms. Noyola has a First Amendment right to record the public operations of law enforcement agents, particularly if agents were indiscriminately targeting Latino individuals such as Ms. Noyola and her siblings for arrest and detention. The agents had no evidence to charge Ms. Noyola with a crime because she was not interfering with law enforcement activities. Ms. Noyola did not impede the activities of the law enforcement agents.

The agents were the only individuals presently believed to have been involved in tackling and arresting Ms. Noyola near the construction site and causing her physical injury, severe emotional distress, and economic losses.

The agents are therefore liable for the false arrest of Ms. Noyola.

2) False Imprisonment

Following Ms. Noyola's violent arrest, agents detained her for hours without charging her with any crime. Agents detained Ms. Noyola without cause while she and her siblings were engaged in constitutionally-protected conduct.

The agents initiated all physical contact without cause. The agents deprived Ms. Noyola and her siblings of their freedom of movement; agents restricted them from leaving after their arrest at the construction site and kept them handcuffed in closed vehicles as agents transported them. Agents transported Ms. Noyola to her mother's house and then the Harlingen ICE Field Office. Ms. Noyola did not consent to be detained. The agents had no legal authority to detain Ms. Noyola or her siblings.

The agents' detention of Ms. Noyola was willful, without her consent, and without authority of law. Therefore, the agents are liable for the false imprisonment of Ms. Noyola.

3) Assault and Battery

The agents who tackled, arrested and detained Ms. Noyola did so intentionally, knowingly, or recklessly, and caused Ms. Noyola bodily injury. The agents further caused physical contact with Ms. Noyola when the agents knew or should have reasonably believed that Ms. Noyola would regard the contact as offensive or provocative.

The agents who tackled, arrested and detained Ms. Noyola and her siblings are liable for assault and battery. As a result of assault and battery without her consent, Ms. Noyola suffered physical

injury and severe emotional distress. Ms. Noyola's injuries are the proximate result of the agents' assault and battery.

4) Trespass to Chattel and Conversion

As part of the agents' unlawful arrest and detention of Ms. Noyola and her siblings, agents took Ms. Noyola's cell phone from her. Agents took Ms. Noyola's cell phone to a private residence several miles north of Brownsville, then eventually took the cell phone back to the Harlingen ICE Field Office. To date, agents have not returned her cell phone, despite having no lawful justification to hold it in their possession.

Agents have wrongfully interfered with Ms. Noyola's cell phone and deprived Ms. Noyola of the use of her cell phone for a substantial period of time. The agents' taking of the cell phone has diminished the value of the property and damaged Ms. Noyola's interest in the use of her cell phone. The agents are therefore liable for trespass to chattel and conversion.

10. Personal Injury:

Damages are owed to Ms. Noyola for her unlawful assault and battery, restraint, arrest, and detention. Ms. Noyola now suffers from significant emotional, physical and economic injuries that disrupt her relationships and overall well-being.

Ms. Noyola has endured significant harm as a direct result of the actions of government agents. The emotional, psychological, economic and physical injuries she suffers continues to affect her relationships and overall well-being. These injuries are directly attributable to the severe trauma agents inflicted on her, for which she is owed compensation.

11. Witnesses:

Possible witnesses include the following: Multiple employees of the Government Agencies, and each entity's contractors, who had contact with or reviewed records related to Ms. Noyola from the time of her initial arrest and detention; employees of the Government Agencies involved in developing and carrying out the raid on July 23, 2025; other individuals whom employees of the Government Agencies arrested and detained during the raid on July 23, 2025; any local law enforcement agents or officials who participated in the raid in any capacity; supervisors, construction workers, and other employees and contractors who were engaged in work at the construction site that was the subject of the raid on July 23, 2025; individuals who witnessed the incident as bystanders, and Ms. Noyola's mother [REDACTED].

Ms. Noyola's siblings, Claudia Noyola and K.N., were present during the incident and are filing administrative claims similar to this one. They are represented by undersigned Counsel and may be contacted through Counsel.

12. Amount of Claim:

Sorayda Noyola is owed damages in the amount of \$2,500,000 for personal injury, and \$2,000 for the loss of her cell phone.

13b. Phone Number of Person Signing Form:

If any additional information is required to expedite this request, please contact Nina Perales, MALDEF Vice President of Litigation, at nperales@maldef.org and (210) 224-5476.