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CEASE AND DESIST

July 30, 2018

Mayor Ted Wheeler
1221 SW 4th Ave, Room 340
Portland, OR 97204

Sent via USPS and email to michael.b.cox@portlandoregon.gov

Dear Sir,

I represent the National Immigration and Customs Enforcement Council ("Council"). The Council and I assert that your current policy forbidding Portland law enforcement agencies from assisting employees of the Immigration and Customs Enforcement Agency ("ICE") who request law enforcement assistance while at or away from work is a violation of the United States Constitution's Equal Protection Clause. As you are aware, the 14th Amendment forbids the government from denying any person or persons equal protection of the laws. Your policy of not providing police services to employees of ICE creates a class of people based upon their source of income. You have failed to articulate why these people deserve to be the target of your ire and, you have failed to articulate the legitimate government interest protected or supported by your targeting of hardworking citizens. We understand that you have a difference of opinion with the current President of the United States, and some of his policies, but we fail to see why targeting the employees of ICE and leaving them vulnerable to violence, harassment and even death furthers a legitimate government interest. Your policy has created a zone of terror and lawlessness. We ask that you end your policy of not responding to calls for police services from ICE employees immediately. Our membership has been the subjected to threats of physical violence and harassment since you announced your policy.

We are requesting a meeting with you to discuss how you can provide law enforcement services to ICE employees. Please feel free to contact me if you would like to schedule a meeting between yourself and my clients. We would like to avoid federal litigation, but we are prepared to protect our membership and their families.

Respectfully,

/s/ Sean J. Riddell
Sean J. Riddell

