



New Jersey

VIA CERTIFIED AND ELECTRONIC MAIL

July 27, 2026

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

Office of the Principal Legal Advisor
Immigration and Customs Enforcement
500 12th St. SW, Mail Stop 5900
Washington, DC 20536-5900
OPLAServiceIntake@ice.dhs.gov

RE: Claim for Damages under the Federal Tort Claims Act
Claimant: Norma Bowe

Dear Counsel:

The undersigned attorney and the American Civil Liberties Union of New Jersey represent Dr. Norma Bowe. Enclosed is an administrative claim for damages under the Federal Tort Claims Act, 28 U.S.C. §§ 1346, 2671-2860, for injuries inflicted on Dr. Bowe by the tortious and unlawful conduct of federal agents who appeared to be Immigration and Customs Enforcement agents on May 25, 2026, in Newark, New Jersey.

On May 25, 2026, Dr. Bowe was outside of Delaney Hall in Newark, New Jersey, where she has volunteered over the past year as a nurse clinician, serving families there to visit loved ones detained inside. As Dr. Bowe stood outside of the detention center, federal agents assaulted her. The agents grabbed Dr. Bowe from behind and the side and forcefully pushed her to the ground. As a direct and proximate result of the attack, Dr. Bowe suffered significant physical and mental harm.

Enclosed with this letter is Norma Bowe's administrative claim as required by the Federal Tort Claims Act, consisting of: (1) a claim authorization form signed by Dr. Bowe; (2) Standard Form 95; and (3) an attachment to Standard Form 95 detailing the facts supporting Dr. Bowe's claim.

We are submitting this claim without the benefit of formal discovery. We are still gathering evidence and Dr. Bowe reserves the right to amend or supplement this claim.

Please provide confirmation of receipt of this filing and contact information of the attorney who will be handling this matter as soon as possible.

Sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

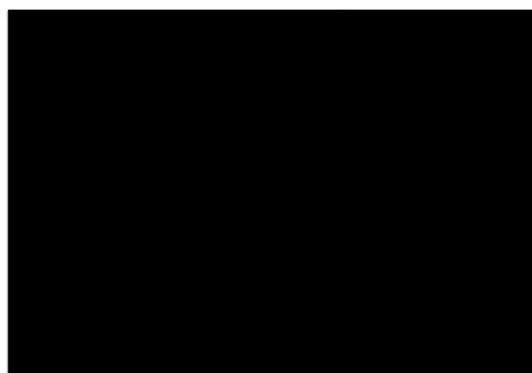
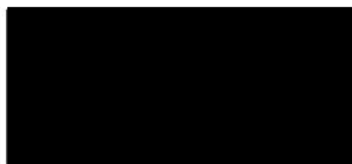
Dillon Reisman
ACLU of New Jersey

A black rectangular redaction box covering a line of contact information.A black rectangular redaction box covering a line of contact information.A black rectangular redaction box covering a line of contact information.

Enclosures

Claim Authorization

I, Norma Bowe, authorize Dillon Reisman and the American Civil Liberties Union of New Jersey to submit a claim under the Federal Tort Claims Act on my behalf to the Department of Homeland Security, including U.S. Immigration and Customs Enforcement and any other appropriate government agency, requesting compensation for the unlawful actions of their agents or employees against me on May 25, 2026 in Newark, New Jersey.



CLAIM FOR DAMAGE, INJURY, OR DEATH		INSTRUCTIONS: Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.		FORM APPROVED OMB NO. 1105-0008	
1. Submit to Appropriate Federal Agency: Office of the Principal Legal Advisor Immigration and Customs Enforcement 500 12th St. SW, Mail Stop 5900 Washington, DC 20536-5900 OPLAServiceIntake@ice.dhs.gov			2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code. Claimant: [REDACTED] Counsel: Dillon Reisman, ACLU-NJ [REDACTED]		
3. TYPE OF EMPLOYMENT ☐ MILITARY ☒ CIVILIAN	4. DATE OF BIRTH [REDACTED]	5. MARITAL STATUS [REDACTED]	6. DATE AND DAY OF ACCIDENT Monday, May 25, 2026	7. TIME (A.M. OR P.M.) Approx. 1:00 P.M.	
8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary). [See attached]					
9. PROPERTY DAMAGE					
NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code). N/A					
BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side). N/A					
10. PERSONAL INJURY/WRONGFUL DEATH					
STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT. [See attached]					
11. WITNESSES					
NAME		ADDRESS (Number, Street, City, State, and Zip Code)			
[REDACTED]		[REDACTED]			
12. (See instructions on reverse). AMOUNT OF CLAIM (in dollars)					
12a. PROPERTY DAMAGE N/A	12b. PERSONAL INJURY \$500,000	12c. WRONGFUL DEATH N/A	12d. TOTAL (Failure to specify may cause forfeiture of your rights). \$500,000		
I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.					
13a. SIGNATURE OF CLAIMANT (See instructions on reverse side). [REDACTED]			13b. PHONE NUMBER OF PERSON SIGNING FORM [REDACTED]		14. DATE OF SIGNATURE 7/27/2026
CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM			CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS		
The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).			Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)		

INSURANCE COVERAGE

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident Insurance? ☐ Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. ☒ No

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? ☐ Yes ☐ No

N/A

17. If deductible, state amount.

N/A

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

N/A

19. Do you carry public liability and property damage insurance? ☐ Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). ☐ No

N/A

INSTRUCTIONS

Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.

Complete all items - Insert the word NONE where applicable.

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filled by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A **SUM CERTAIN** FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN **TWO YEARS** AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.

(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.

(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.

(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.

PRIVACY ACT NOTICE

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

A. **Authority:** The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

B. **Principal Purpose:** The information requested is to be used in evaluating claims.

C. **Routine Use:** See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.

D. **Effect of Failure to Respond:** Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

PAPERWORK REDUCTION ACT NOTICE

This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.

We present the narrative information required in the Standard Form 95 (SF-95) (Questions 8, 9, and 10) below. The remaining information is in the enclosed SF-95 form.

Response to Question 8, Basis of Personal Injury

This claim arises from the violent and unprovoked assault of Dr. Norma Bowe by federal agents, including Immigration and Customs Enforcement (“ICE”) agents, in front of Delaney Hall, an immigration detention center in Newark, New Jersey on May 25, 2026. Dr. Bowe submits this claim without the benefit of discovery and reserves the right to amend or supplement this claim.

Background on Dr. Bowe

Dr. Bowe is [REDACTED]. She is a grandmother, a U.S. citizen, a New Jersey resident, and an academic with a Ph.D. in community health policy who works as an associate professor of public health at Kean University in Union, New Jersey. Dr. Bowe is also a nurse clinician who operates a mobile health clinic out of a recreational vehicle (“RV”) that provides free health screenings, diagnostic testing, and first aid services to underserved communities throughout northern New Jersey. Since approximately May 2025, Dr. Bowe has regularly visited Delaney Hall to provide clinical services to families visiting detained loved ones. Those services include mental health, medical care, and first aid, as well as providing food, baby formula, water, and blankets to family members outside of Delaney Hall.

Day of the Incident

On May 25, 2026, Dr. Bowe arrived at Delaney Hall at approximately 10:00 a.m. and parked her RV on Doremus Avenue, near the facility. During the first two hours of her day at Delaney Hall, Dr. Bowe delivered water and supplies and provided care to family members, including two children who were having trouble breathing while waiting to visit their detained father.

At approximately 1:00 p.m., Dr. Bowe was in her mobile clinic when someone asked her to help an injured person and indicated that the person was near the facility’s south gate.

Dr. Bowe walked towards Delaney Hall’s south gate, wearing a bright red stethoscope around her neck. As she walked, she saw a large group of ICE agents and other law enforcement officers, as well as demonstrators. Accompanied by a large, armored personnel carrier, the agents wore paramilitary-style garb, covered the lower part of their faces with masks, and carried pepper spray, batons, tasers, and firearms. Many wore “ICE” or “ERO” insignia on their clothing or tactical gear.

When she reached the area near the south gate, Dr. Bowe stood to the side, wearing her stethoscope, looking for the injured person she was there to assist. As she stood, she saw agents dragging a young woman on the ground, pulling off her pink and black shirt as they did so and discarding it on the ground. The woman yelled “help me, help me” as agents dragged her body along the asphalt. Dr. Bowe, thinking of her own daughters, began to move toward the woman to offer aid.

As Dr. Bowe moved to help the young woman on the ground, two ICE agents¹ assaulted her. The first agent wore a black vest with a “POLICE” patch on the front, a gaiter covering the bottom half of his face, and a black baseball cap. The second agent wore tactical gear emblazoned with the words “POLICE” and “ICE,” and a green ballistic helmet, as pictured below, seconds after the attack:



The first masked agent walked up behind Dr. Bowe and shoved her forward. A second masked agent appeared on Dr. Bowe’s right side. Together, the agents threw Dr. Bowe forward so violently that she flew through the air and crashed to the ground, bouncing once before landing with her head on the concrete sidewalk and her lower body on the asphalt of the parking lot, next to the young woman’s pink and black shirt the officers had discarded on the ground moments earlier. Dr. Bowe landed hard on her face and knee and hit her hand as she attempted to break her fall.

Members of the public rushed to help Dr. Bowe. Neither the agents who attacked her nor any other federal officer offered any aid.

¹ The involved individuals were, to the best of the claimant’s knowledge and based on the information currently available, ICE agents. Presentment to the Department of Homeland Security therefore satisfies the presentment requirements set forth in the FTCA and federal regulations, including 28 C.F.R. § 14.2. To the extent individuals from other federal agencies were involved in the incident at issue in this claim, we request that the Department of Homeland Security identify those individuals and agencies and adhere to the process set forth in 28 C.F.R. § 14.2(b).

As Dr. Bowe flew through the air and crashed to the ground, she thought of Alex Pretti, the ICU nurse shot and killed by ICE agents in Minneapolis in January 2026. Dr. Bowe was deeply impacted and personally shaken when she heard the story of Alex Pretti. Now, just like Alex Pretti, a fellow nurse, Dr. Bowe was grabbed from behind and violently assaulted by ICE agents all while responding to a call for assistance.

Although her knee and head were in tremendous pain, Dr. Bowe attempted to sit up as quickly as she could out of fear that the agents were not done assaulting her and would resume their attack.

Dr. Bowe eventually returned to the mobile clinic, still parked nearby. Her knee was swollen and her face badly bruised from slamming into the pavement. Her hands had abrasions from her attempt to stop her fall. She was then driven to the emergency room.

These facts support multiple legal claims including, but not limited to assault, battery, and intentional infliction of emotional distress.

Response to Question 9, Property Damages

Our investigation is ongoing but we are unaware of property damage at this time. We reserve the right to amend or supplement this response.

Response to Question 10, Personal Injury

As a result of the conduct described in response to Question 8, Dr. Bowe suffered physical injuries, including injuries to her face, head, right knee, right arm, and right hand. Dr. Bowe went to the emergency room on May 25, 2026, and has received ongoing medical care since that time. A subsequent MRI showed a fracture to her kneecap and a torn meniscus in her knee. She is receiving ongoing medical care, which may identify additional injuries. She experiences ongoing physical pain from her injuries.

The tortious conduct described in response to Question 8 has also caused Dr. Bowe severe mental and emotional distress. Two months after her head hit the pavement outside Delaney Hall, Dr. Bowe still experiences constant headaches, difficulty sleeping, and mental distraction. She experiences ongoing pain and suffering.

Her injuries have also had a significant impact on her ability to do activities she enjoys, including babysitting her infant grandchild.

All of these injuries are the direct and proximate cause of the tortious conduct of federal agents, including ICE agents, on May 25, 2026.