

ROADSIDE ASSIST

WASHINGTON STATE'S CONTINUED SHARING OF DRIVERS' INFORMATION WITH FEDERAL IMMIGRATION ENFORCEMENT



**Roadside Assist:
Washington State's Continued Sharing of Drivers' Information with Federal
Immigration Enforcement**

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The University of Washington Center for Human Rights is committed to interdisciplinary excellence in the education of undergraduate and graduate students in the field of human rights; promoting human rights as a core area of faculty and graduate research; and engaging productively with local, regional, national, and international organizations and policymakers to advance respect for human rights.

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EXECUTIVE SUMMARY

Today, immigrant Washingtonians are increasingly afraid to drive, as our streets, highways, and public thoroughfares have become frequent sites for immigration enforcement. These incidents, in which drivers are typically apprehended by masked, unidentified agents driving unmarked vehicles, raise multiple human rights concerns: many arrests appear to have been warrantless,¹ some have been violent,² and some apprehensions have involved U.S. citizens.³ Unfortunately, this research shows that this pattern of abuse is happening with the assistance of Washington state institutions, despite laws and policies prohibiting such practices.

Since August, the University of Washington Center for Human Rights has verified nine cases where Washington drivers were subjected to immigration enforcement while driving, following a search of their license plate number in the Washington Department of Licensing (DOL)'s database by federal agents using a national data-sharing platform called Nlets, made possible through the Washington State Patrol (WSP)'s ACCESS platform. In at least seven of these cases, UWCHR researchers were able to confirm that the arrests were acts of civil immigration enforcement. While state authorities now claim to have curtailed access by one of ICE's sub-agencies to DOL data via ACCESS, in eight of the nine confirmed cases discussed in this report, it was CBP, not ICE, who conducted the query. There is therefore no reason to believe that this process does not continue to date.

It is impossible to calculate how many Washingtonians may have been affected by this widespread practice. Indeed, between January 1, 2025 and November 30, 2025, federal agencies used ACCESS/Nlets to query WADOL data a total of 2,671,776 times, according to data provided by DOL to UWCHR.⁴ Not all of these queries represent the use of Washington resources to conduct civil immigration enforcement; the figure includes the verification of documents at U.S.-Canadian border crossings and many other lawful purposes. But the cases verified by UWCHR researchers likely form part of a much broader pattern of federal agents tapping into WA DOL data to target Washingtonians for arrest for civil immigration violations, a practice the state has repeatedly promised to stop.

1 Reports of civil immigration enforcement arrests where the arrested person was not presented with a warrant are very common. See for example Mirna Alsharif, "ICE detains father in Washington state; pregnant wife pleads, 'I just want him home'", NBC News, 15 July 2025: <https://www.nbcnews.com/news/us-news/ice-detains-soon-father-washington-state-pregnant-wife-pleads-just-wan-rcna218855>; Sharon Yoo, "What to know about the ICE arrest video out of Spokane", King 5, 12 March 2025: <https://www.king5.com/article/news/community/facing-race/ice-arrest-video-out-spokane-legality/281-a096c138-cfd9-446a-aa35-cd61da26b863>; Aaron Hedge, "Local immigrant arrested without warrant. His wife doesn't know where he's been taken.", Range Media, 2 May 2025: <https://rangemediaco.com/arrested-without-warrant-migrant-wife/>. Recent court cases in Oregon have also revealed details of a systematic practice of warrantless civil immigration arrests, see Alma McCarty, "Arrest first, ask questions later: Judge orders on-the-spot release of Beaverton man that CPB detained without a warrant", KGW News 8, 26 December 2025: <https://www.kgw.com/article/news/politics/immigration-news/federal-judge-orders-beaverton-man-freed-arrested-without-warrant/283-fc9207a5-a387-49c6-8d50-3bad1524abee>; and Maxine Bernstein, "ICE officers reveal arrest quotas, facial recognition use in Oregon dragnet", The Oregonian/OregonLive, 4 December 2025: <https://www.oregonlive.com/crime/2025/12/ice-officers-reveal-arrest-quotas-facial-recognition-use-in-oregon-drag-net.html>.

2 See, for example, Adam Gabbat, "Senator says ICE 'attack dog' caused 'horrific' injuries to unresisting man as he was detained", The Guardian, 6 December 2025: <https://www.theguardian.com/us-news/2025/dec/06/us-senator-ice-attack-dog-horrific-injuries>; Tyler Brown, "Witnesses, video: ICE vehicle ran over legs of man detained in Vancouver", The Columbian, 5 December 2025: <https://www.columbian.com/news/2025/dec/05/witnesses-video-ice-vehicle-ran-over-legs-of-man-detained-in-vancouver/>

3 See, for example, Daniel Beekman, "ICE fears sweep WA's Yakima Valley after Trump takes office", The Seattle Times, 9 February 2025: <https://www.seattletimes.com/seattle-news/northwest/ice-fears-sweep-was-yakima-valley-after-trump-takes-office/>

4 DOL public records request 25-24279.

This has occurred through the collaboration of two state agencies—the Washington Department of Licensing and the Washington State Patrol—and despite policies and state laws prohibiting it. It has occurred despite multiple previous revelations that the Department of Licensing was sharing driver data with federal immigration authorities, and multiple pledges that this would stop.

It is time for accountability.

INTRODUCTION

Today, many immigrant Washingtonians express a fear of driving, in ways that impede their ability to work, attend school, access food and healthcare, and participate in the life of their communities.⁵ This stems not only from increased immigration enforcement by federal officers in our state, but also from the inconsistent and incomplete actions taken by Washington state to ensure the privacy of driver and vehicle data entrusted to them by Washingtonians who believed the commitment, articulated since 2017,⁶ that our state was a “welcoming jurisdiction” where state officials

5 See for example Gustavo Sagrero Álvarez, “Immigrant families in Seattle seek sanctuary and safety as ICE threat looms”, KUOW, January 30, 2025: <https://www.kuow.org/stories/immigrant-families-in-seattle-seek-sanctuary-and-safety-as-ice-threat-looms>; and Sharon Yoo, “Fear is the daily reality of being undocumented in America”, King 5, 11 June 2025: <https://www.king5.com/article/news/community/facing-race/washington-immigration/undocumented-immigrants-fear-deportation-america-washington-yakima/281-931a11c0-f1f8-4c3d-a866-56bea029c0c>; national polling also reflects heightened fear among immigrant communities leading to decreased time away from home: KFF, “Amid Increased Immigration Enforcement, a Majority of Lawfully Present Immigrants Are Worried They or a Family Member Could Be Detained or Deported”, 20 May 2025: <https://www.kff.org/immigrant-health/amid-increased-immigration-enforcement-a-majority-of-lawfully-present-immigrants-are-worried-they-or-a-family-member-could-be-detained-or-deported/>

6 See Executive Order 17-01, “Reaffirming Washington’s Commitment to Tolerance, Diversity, and Inclusiveness”, State of Washington, Office of the Governor, 23 February 2017: https://governor.wa.gov/sites/default/files/exe_order/eo_17-01.pdf; aspects of this commitment later became state law in the form of the 2019 Keep Washington Working Act.

would not collaborate with federal agents seeking to enforce civil immigration laws against them.

Washington has long recognized freedom from discrimination due to immigration status as a civil right, guaranteeing immigrants rights to full participation in commerce, enjoyment of public spaces, facilities, and accommodations under state law.⁷ Indeed, Washington was the first state in the nation to provide access to drivers licenses for all those in compliance with safety and residence requirements, regardless of citizenship;⁸ since 2019, our state has codified into law the prohibition on motor vehicle information being used for surveillance of “Washington residents solely on the basis of race, religion, immigration, or citizenship status, or national or ethnic origin.”⁹

Over the years, however, faith in these commitments has been shaken multiple times when investigations revealed that state authorities were, despite their promises, sharing Washingtonians’ driver license and/

7 See Revised Code of Washington, RCW 49.60.030 Freedom from discrimination—Declaration of civil rights, <https://app.leg.wa.gov/rcw/default.aspx?cite=49.60.030>

8 Recognizing the benefits of such practices for public safety, trust, and inclusion, multiple states have followed Washington’s lead in recent years, including Massachusetts, Minnesota, and others. “Registry of Motor Vehicles Announces Standard Driver’s Licenses Regardless of Immigration Status Available Soon Under Work and Family Mobility Act”, Massachusetts Department of Transportation, 14 June 2023, <https://www.mass.gov/news/registry-of-motor-vehicles-announces-standard-drivers-licenses-regardless-of-immigration-status-available-soon-under-work-and-family-mobility-act>; “DVS getting Minnesotans ready for Driver’s License for All”, Minnesota Department of Public Safety, 3 August 2023: https://www.google.com/url?q=https://dps.mn.gov/news/dvs-getting-minnesotans-ready-drivers-license-all&sa=D&source=docs&ust=1766096849317701&usg=AOvVaw17_kAvAiARNiMIN5yhI9SI

9 See RCW 46.12.630, Section 2(b), which reads “The department of licensing may furnish lists of registered and legal owners of motor vehicles or vessels, only to the entities and only for the purposes specified in this section, to...Any governmental agency, including any court or law enforcement agency, or any private person or entity acting on behalf of a federal, state, or local agency, or Canada in carrying out its functions: PROVIDED, HOWEVER, That nothing in this section is construed to allow actions prohibited under RCW 43.17.425.”

or vehicle registration information with federal immigration authorities. Each time, state leaders took steps to restrict federal immigration authorities' access to Washington driver data; but each time, the steps taken were partial and insufficient.

Between January 1, 2025 and November 30, 2025, federal agencies queried Washington DOL data using a nationwide data-sharing platform called Nlets a total of 2,671,776 times.¹⁰ While this figure includes border crossings and other lawful uses of this platform, UWCHR has identified nine cases where in locations far from the border, Washingtonians were apprehended for immigration violations as a result of DOL data-sharing through Nlets; at least seven of these cases involve civil immigration enforcement actions. It is likely that these cases represent a mere fraction of the total.

These practices imperil *all* Washingtonians. We all want to live in a state where parents are able to drop their children off at school, where workers can reach their places of employment, where transportation and our public roadways are safe, including for those from out of state who visit to access healthcare or other rights.¹¹

10 This figure includes searches by nine federal agencies: DHS, CBP, USCIS, ICE, HSI, DEA, ATF and INS; it was released to UWCHR researchers by the DOL pursuant to public records request # 25-24279. This contrasts dramatically with data released to UWCHR researchers pursuant to an identical request made of the WSP, which stated that federal agencies had queried DOL data 20,798,467 times (request R016616-110925). According to state officials with DOL and WSP in correspondence with UWCHR on January 7, 2026, the figure cited by WSP erroneously included queries by all federal agencies and other out of state local and state law enforcement agencies.

11 While the cases documented in this report involve immigrant Washingtonians, the patterns of surveillance and criminalization they reveal have far broader implications. At a time when some U.S. states are taking active steps to criminalize the provision of reproductive and gender-affirming care, Washington enacted a "shield law" in 2023 which "prohibits Washington state and local agencies and law enforcement from providing information to or cooperating with" states that have banned such care. Yet just as federal agencies have mined WA DOL database for information about immigrants in ways that circumvent the protections afforded under our state's "sanctuary" law, law enforcement agencies from states that ban abortion have already made

The practice of handing Washington drivers' data to those who do not share Washington's commitments has turned our public roadways into hunting grounds. This represents a threat to the immediate well-being of immigrant Washingtonians, an affront to the values our state has pledged to uphold, and a betrayal of the public trust.



UNFORTUNATELY, THIS RESEARCH SHOWS THAT THIS PATTERN OF ABUSE IS HAPPENING WITH THE ASSISTANCE OF WASHINGTON STATE INSTITUTIONS, DESPITE LAWS AND POLICIES PROHIBITING SUCH PRACTICES.

HOW DID WE GET HERE? DRIVERS' LICENSES FOR ALL IN WASHINGTON

In 1993, Washington became the first state in the nation to offer drivers' licenses to all those who passed road safety and residence requirements, regardless of citizenship.¹² Since that time, our state has been joined by 18 others, as well as

use of other surveillance tools, such as automated license plate readers, to circumvent our state's "shield" law. See Washington State Office of the Attorney General, "Reproductive and Gender-Affirming Care: Shielding Providers, Seekers, and Helpers From Out-of-State Legal Actions", updated 16 December 2025, <https://www.atg.wa.gov/reproductive-and-gender-affirming-care-shielding-providers-seekers-and-helpers-out-state-legal>

12 HB 1444, passed in 1993, specified that residence in the state, but not proof of authorized immigration presence, was required to obtain a driver's license in Washington. Requiring identification for driver's licenses and identicards, HB 1444, Washington State Legislature, 1993-94: <https://app.leg.wa.gov/billsummary?BillNumber=1444&Year=1993>. This made Washington the first state to extend this opportunity to undocumented residents.

the District of Columbia and Puerto Rico.¹³ Many organizations¹⁴ and state Departments of Motor Vehicles¹⁵ have applauded these laws as promoting safety and accountability for all drivers while extending opportunities for inclusion to immigrant families. What's more, these state practices are perfectly legal under federal law; the REAL ID Act of 2005 explicitly allows states to issue drivers' licenses to all regardless of migration status.¹⁶

Washington law did not initially incorporate explicit protections for immigrant drivers' data, but as federal enforcement increased in recent years, the need for such protections became evident. In 2017, then-Governor Jay Inslee issued [Executive Order 17-01](#) ordering that "No executive or small cabinet agency may use agency or department monies, facilities, property, equipment, or personnel for the purpose of targeting or apprehending persons for violation of federal civil immigration laws, except as required by federal or state law or otherwise authorized by the Governor."¹⁷ This

Executive Order served as a precursor to the statewide "sanctuary" law, Keep Washington Working, passed two years later.

However, in 2018, an investigation by the *Seattle Times* revealed that despite the Executive Order, DOL employees were assisting federal immigration authorities in enforcing civil immigration law.¹⁸ At that time, employees of Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) would email the DOL's License Integrity Unit to request copies of driver license applications or drivers' photos, and DOL employees would respond with the requested documentation. When this news broke, DOL leadership tried to downplay the breach, claiming that such requests had happened 20 to 30 times per month; upon further investigation, however, it was revealed that the practice was far more widespread, leading to the release of data of as many as 900 people over email between May 2018 and January 2019, some of whom were subsequently subjected to civil immigration enforcement.¹⁹ UWCHR researchers found that in fact, a significant proportion of those whose data was requested were Washington-born U.S. citizens with Latino surnames. Moreover, the DOL acknowledged that ICE and CBP were also able to freely search records in the DOL's [Driver and Plate Search](#) (DAPS) database, which contains information about drivers and vehicles registered in our state; audit logs revealed that from 2016-2018 ICE Enforcement and Removal Operations (ERO) had searched the DOL's DAPS database more than 100,000 times.²⁰

13 "State Laws Providing Access to Driver's Licenses or Cards, Regardless of Immigration Status", National Immigration Law Center, updated August 2025: <https://www.nilc.org/wp-content/uploads/2024/06/drivers-license-access-table-2025-08.pdf>

14 See "Why States Should Grant Driver's License to All Residents", CLINIC, 9 October 2019: <https://www.cliniclegal.org/resources/state-and-local/why-states-should-grant-drivers-license-all-residents>; "The Benefits of Allowing All Immigrants Access to Driver's Licenses", Colorado Fiscal Institute, January 2018: https://www.coloradofiscal.org/wp-content/uploads/2018/02/drivers-licenses-for-unauthorized-immigrants_2018-FINAL.pdf; and "Protecting State Driver's License Information", National Immigration Law Center, August 2025: <https://www.nilc.org/wp-content/uploads/2025/08/protecting-drivers-license-information-2025-08.pdf>

15 "Driver's License for All", Minnesota Department of Public Safety, accessed 18 December 2025: <https://dps.mn.gov/divisions/dvs/license-and-id/dl-all>; "AB 60 Driver's Licenses", California Department of Motor Vehicles, accessed 18 December 2025: <https://www.dmv.ca.gov/portal/driver-licenses-identification-cards/assembly-bill-ab-60-driver-licenses>; "Standard Licenses and IDs", Colorado Department of Revenue, Division of Motor Vehicles, accessed 18 December 2025: <https://dmv.colorado.gov/drivers/standard-license-and-id-cards>

16 See "Deciding Who Drives: State choices surrounding unauthorized immigrants and driver's licenses", The Pew Charitable Trusts, August 2015: <https://www.pew.org/en/research-and-analysis/reports/2015/08/deciding-who-drives>

17 State of Washington, Office of the Governor, Executive

Order 17-01: https://governor.wa.gov/sites/default/files/exe_order/eo_17-01.pdf

18 Nina Shapiro, "Washington state regularly gives drivers' info to immigration authorities; Inslee orders temporary halt", *The Seattle Times*, 11 January 2018: <https://www.seattletimes.com/seattle-news/times-watchdog/washington-state-regularly-gives-drivers-info-to-immigration-authorities-inslee-orders-temporary-halt/>

19 Nina Shapiro, "Washington Department of Licensing details how often it gave residents' info to immigration officials", 17 April 2018: <https://www.seattletimes.com/seattle-news/times-watchdog/washington-state-discloses-how-often-it-shared-information-with-immigration-authorities/>

20 See "American Dragnet: Data-Driven Deportation in the

In response, protests erupted across the state, and the DOL's Deputy Director resigned; eventually the Director did as well, citing personal reasons.²¹ Governor Inslee personally apologized, stating, "The recent revelations about our state Department of Licensing's failure to safeguard certain information ... angered me. I issued an executive order nearly one year ago saying we would do all we could to protect Washington's immigrants and refugees from blatantly discriminatory enforcement and deportation efforts. DOL fell short in meeting those expectations, and for that I apologize."²² He told the press, "We really want to make clear that we're not going to allow the federal government to commandeer the use of our state resources as part of their immigration effort."²³

DOL leadership then put an end to the practice of sharing driver data by email, except in cases where authorized by a judicial warrant. It also terminated DAPS contracts with four federal offices, including two from ICE, one CBP unit and one U.S. Citizenship and Immigration Services (USCIS) unit.²⁴ Additionally the agency updated

the permissible use clauses included in all DAPS contracts, now expressly prohibiting the use of the database "for purposes of investigating, locating, or apprehending individuals for immigration related violations."²⁵

The ire unleashed by this scandal eventually contributed to the 2019 passage of the Keep Washington Working Act, a law prohibiting the use of state or local government "funds, facilities, property, equipment, or personnel to investigate, enforce, cooperate with, or assist in the investigation or enforcement of any federal registration or surveillance programs or any other laws, rules, or policies that target Washington residents solely on the basis of race, religion, immigration, or citizenship status, or national or ethnic origin."²⁶ This law applies to the DOL as well as most other state and local agencies.²⁷

Yet in July 2025, despite promises now enshrined in law, an investigation by King 5 showed that federal agents were once again using DAPS to obtain driver information from Washington's DOL for purposes of civil immigration enforcement.²⁸ Searches of the DAPS database by ICE had soared in 2025, and had led to multiple arrests of Washingtonians in civil immigration cases.²⁹ In response, DOL officials initially told King 5 and community organizations that the information reported was incorrect, insisting that the database had not, in fact, been used for immigration

21st Century", Georgetown Law Center on Privacy & Technology, 10 May 2022, footnote no. 113: https://americandrag-net.org/finding2#footnoteref113_tpf35b0

21 Paige Browning, "Immigrant advocates pressure Washington's licensing chief to step down", 15 February 2018: <https://www.kuow.org/stories/immigrant-advocates-pressure-washingtons-licensing-chief-step-down/>; "Protesters demand resignation of DOL director", Northwest Asian Weekly, 20 April 2018: <https://nwasianweekly.com/2018/04/protesters-demand-resignation-of-dol-director/>; "DOL director resigns after months of criticism and protest", Yakima Herald-Republic, 10 May 2018: https://www.yakimaherald.com/news/northwest/dol-director-resigns-after-months-of-criticism-and-protest/article_6ec9c2f8-54aa-11e8-8aca-0389840bd0c7.html.

22 Ibid.

23 Frank Bajak, "Washington DOL denies giving ICE access to facial recognition searches", King 5, 8 July 2019: <https://www.king5.com/article/news/ice-used-facial-recognition-to-search-state-drivers-license-databases/507-3f905179-519d-4acc-bb92-a5ae6aaea275>.

24 Washington State Department of Licensing, "DOL takes immediate steps to stop disclosure of information to federal immigration authorities", Licensing Express, 15 January 2018: <https://licensingexpress.wordpress.com/2018/01/15/dol-takes-immediate-steps-to-stop-disclosure-of-information-to-federal-immigration-authorities/>; see also Washington State Department of Licensing, "Presentation by the DOL

to the Joint Transportation Committee", 17 May 2018, p. 18: <https://jsis.washington.edu/humanrights/wp-content/uploads/sites/22/2026/01/DOL-data-sharing-May-2018.pdf>

25 Ibid.

26 See RCW 43.17.425, Immigration and citizenship status—State agency restrictions: <https://app.leg.wa.gov/RCW/default.aspx?cite=43.17.425>

27 The Department of Corrections is a notable exception.
28 Kristin Goodwillie, "Exclusive: A Washington state agency is sharing drivers' private data with ICE", King 5, 11 July 2025: <https://www.king5.com/article/news/investigations/investigators/exclusive-washington-state-agency-department-licensing-shares-private-driver-data-with-ice/281-910b35d8-e1fd-4b30-9ceb-00e6708f3b24>

29 Ibid.

enforcement.³⁰ But the next day, they recanted, saying that in fact, ICE had lied about its use of the database, thus violating the permissible use standards implemented in 2018.³¹

A month later, on August 27, 2025, DOL terminated the DAPS accounts of ICE ERO and ICE HSI.³² According to DOL, those accounts remain terminated to this day.³³

At that time, DOL issued a statement affirming that “The Department of Licensing takes our responsibility to protect Washingtonians’ information very seriously. It is important to understand that this system does not contain information about individuals’ immigration status. DOL has been a national leader on protecting our residents’ information and has taken meaningful steps to limit the data in the system that could indicate someone’s immigration status.”³⁴

30 Kristin Goodwillie, “This should have been prevented: Leaders respond to state slashing ICE database access after KING 5 investigation”, King 5, 27 August 2025: <https://www.king5.com/article/news/investigations/investigators/king-5-investigation-washington-state-slashing-agreement-with-ice/281-4d3c69d9-56fe-49ed-8e2d-98a34615160d>

31 Nina Shapiro, “WA cuts off ICE access to data system used for immigration enforcement”, The Seattle Times, 28 August 2025: <https://www.seattletimes.com/seattle-news/wa-cuts-off-ice-access-to-data-system-used-for-immigration-enforcement/>

32 Ibid.

33 Conversation between Alejandro Sánchez, DOL Deputy Director, and UWCHR Director Angelina Godoy, November 10, 2025. Since then, DOL officials have met repeatedly with community organizations to share information, but to UWCHR’s knowledge there has been no public accounting of which federal agencies retain active DAPS accounts nor any public commitment as to what it will take for suspended or cancelled accounts to be brought back online.

34 The statement further emphasized that in fact, *some* sharing of driver data with federal authorities was important to many Washingtonians: “For example, if the Department of Licensing did not share any licensing information with federal agencies, it would likely compromise Washingtonians’ ability to use their Enhanced Drivers Licenses for travel. Washingtonians trying to cross the Canadian border might not be able to do so without their passport. People who had used their Enhanced Driver Licenses to cross the border could find themselves stuck in Canada if this system suddenly shut down.” See Kristin Goodwillie, “Washington state agency under fire for sharing drivers’ data with ICE”, King 5, 21 July 2025: <https://www.king5.com/article/news/investigations/>

Yet what DOL failed to acknowledge was that curtailing access to DAPS would not prevent ICE and other federal agencies from continuing to mine Washington driver and vehicle data for purposes of immigration enforcement—it would just require them to use a different route.³⁵

In fact, the most common pathway through which Department of Homeland Security (DHS) accesses driver and vehicle information nationwide is via a data switchboard known as Nlets,³⁶ described in detail below. This pathway remained open until yet *another* set of public revelations in November 2025 prompted Governor Ferguson’s office to claim it had now taken action to limit access by ICE ERO to DOL data via Nlets.

This time, members of Congress under the leadership of Senator Wyden (D-OR) reached out to Democratic governors across the country to encourage them to curtail access to their state drivers’ data via Nlets by federal agencies engaged in immigration enforcement. In response, Governor Ferguson’s office moved swiftly to block ICE ERO’s access to Nlets before Sen. Wyden and his colleagues went public with their recommendations. As a result, the Congressional letter published on

[investigators/washington-state-license-agency-under-fire-for-sharing-drivers-data-with-ice/281-c38e5569-b500-4f19-9a2c-660af77a4fc9](https://www.king5.com/article/news/investigations/washington-state-license-agency-under-fire-for-sharing-drivers-data-with-ice/281-c38e5569-b500-4f19-9a2c-660af77a4fc9)

35 DOL was aware, as far back as 2018, that federal immigration agencies were making thousands of requests for Washington drivers’ data using Nlets; at the time, DOL divulged that information to stakeholders in a presentation obtained via public records request by Georgetown Law Center for Technology & Privacy: Washington Department of Licensing, WADMV_002876-wADMV_002883.pdf, https://jsis.washington.edu/humanrights/wp-content/uploads/sites/22/2026/01/WADMV_002876-WADMV_002883.pdf; cited in Georgetown Law Center for Technology & Privacy, “American Dragnet”, footnote no. 120: https://americandrag.net/finding2#footnote120_cwh1zol

36 “Generally, DHS Components are able to access DMV information through the National Law Enforcement Telecommunication System (Nlets).” See Document 43-1, filed Apr. 24, 2020, in Lewis-McCoy, et al. v. Wolf, et al., Case 1:20-cv-01142-JMF, S.D.N.Y., p. 31: <https://jsis.washington.edu/humanrights/wp-content/uploads/sites/22/2026/01/Court-docs-re-NY-GreenLight-law.pdf>

November 12, 2025 notes that “after engaging with Congressional Democrats, Washington indicated that it too has now blocked ICE’s access to DMV data.”³⁷ In a subsequent communications sent to UWCHR Director Angelina Godoy, DOL and WSP clarified that this took effect on November 19.³⁸

In written correspondence on December 12, 2025, a representative of the Washington State Patrol told UWCHR that while Washington had blocked ICE ERO’s access to Department of Licensing data in ACCESS/Nlets, access for Homeland Security Investigations (which is an ICE subagency) and CBP remained open.³⁹

WHAT IS NLETS?

Nlets⁴⁰ describes itself as a “not-for-profit computer-based message switching system that links together and supports every state, local, and federal law enforcement, justice, and public safety agency for the purposes of sharing and exchanging critical information.”⁴¹

Nlets explains its work in plain language: “Imagine that you are a California driver on your way to Arizona. Since the drive is long and boring, you start to speed and are then pulled over by a state trooper. Because you are from California, you present your California driver license to the trooper. However, the trooper

and dispatch in Arizona do not have direct access to the DMV information that California has about you, so they run a Nlets check to securely access that information. To accomplish this, the request is sent to dispatch by way of a Nlets query. Nlets first receives the query from the agency and checks to make sure it is a valid request. This is done by validating the Originating Agency Identifier... to make sure the agency that is requesting the information is authorized to receive it. Once the validation is complete, the request is forwarded to California. California receives the request and pulls the information that is needed by the out-of-state trooper and sends an automated response back to Nlets. Nlets receives the response from California and then forwards the information back to the dispatcher in Arizona that made the initial request and ultimately the information gets back to the trooper that pulled you over. While this might sound like a lot of steps, the process is extremely quick, averaging about 1.5 seconds in total. What’s more, this happens all day, every day.”⁴²



AN NLETS USER COULD INPUT THE NAME, DRIVER LICENSE NUMBER, OR LICENSE PLATE OF A PERSON OF INTEREST AND OBTAIN COPIOUS AMOUNTS OF INFORMATION ABOUT THAT INDIVIDUAL.

Of course, it makes intuitive sense that law enforcement officers in one state might need to access information held by their counterparts in another state about a suspect whose activities have crossed state lines. But as the National

37 Senator Ron Wyden (D-OR) et. al, Congressional letter to Democratic Governors regarding ICE access to DMV databases, 12 November 2025: <https://www.wyden.senate.gov/imo/media/doc/congressional-dmv-ice-letter-to-dem-governor-spdf.pdf>

38 Email from DOL Deputy Director Alejandro Sanchez to Angelina Godoy, 7 January 2025.

39 Email from Washington State Patrol Director of Public Affairs Chris Loftis to UWCHR Director Prof. Angelina Godoy, December 12, 2025.

40 Originally created in the 1960s as the National Law Enforcement Telecommunications System, Nlets’ official name subsequently changed to the International Justice and Public Safety Network, but it is still widely referred to by its original acronym.

41 Nlets, “About: What We Do”, accessed 18 December 2025: <https://nlets.org/about/what-we-do>

42 Nlets, “Nlets 101”, accessed 7 January 2025: <https://nlets.org/resources/blog/nlets-101>

Immigration Law Center explains, “Nlets’ publicly available resources describe a system for sharing criminal justice and ‘public safety’ information. But its uses extend far beyond that, enabling the sharing of driver’s license, vehicle registration, and biometric, biographical and other information in the service of civil immigration enforcement. And it is closely linked with commercial businesses that gather and share personal information in unregulated ways.”⁴³

While this report focuses on Nlets’ role in sharing WA DOL data for purposes of immigration enforcement, the fact that the network itself is so shrouded in secrecy—despite serving a function in the apparent interests of public safety—is itself grounds for concern. Indeed, the fact that UWCHR has received such disparate numbers from WSP and DOL in requests for information about ACCESS and Nlets’ role in sharing Department of Licensing data from our state suggest an urgent need for transparency about the obscure, and yet apparently far-reaching, role of these networks.⁴⁴ Below, we describe what we have learned to date about these agencies’ role in sharing driver and vehicle data and its role in immigration enforcement in our state.

In each state, a specific law enforcement entity is designated to provide access to Nlets through a “switch”; in Washington, this service is provided by the Washington State Patrol through an interface known as ACCESS.⁴⁵ Nlets—and ACCESS—are not themselves databases, but switchboard-like systems through which users

43 National Immigration Law Center, “Nlets: Questions and Answers”, November 2020: <https://www.nilc.org/resources/nlets-questions-and-answers/>

44 For example, the sharing of WA DOL data with federal agencies via Nlets involves two state agencies: WA DOL—whose databases are queried by Nlets users—and the WSP, who provides the ACCESS interface through which such queries are conducted. It is surprising, therefore, that WSP’s figures regarding the numbers of such queries outpace DOL’s tenfold, and that both agencies’ written policies prohibit the very practices their own records show are occurring regularly, as we illustrate in this report.

45 ACCESS is an acronym which stands for A Central Computerized Enforcement Service System.

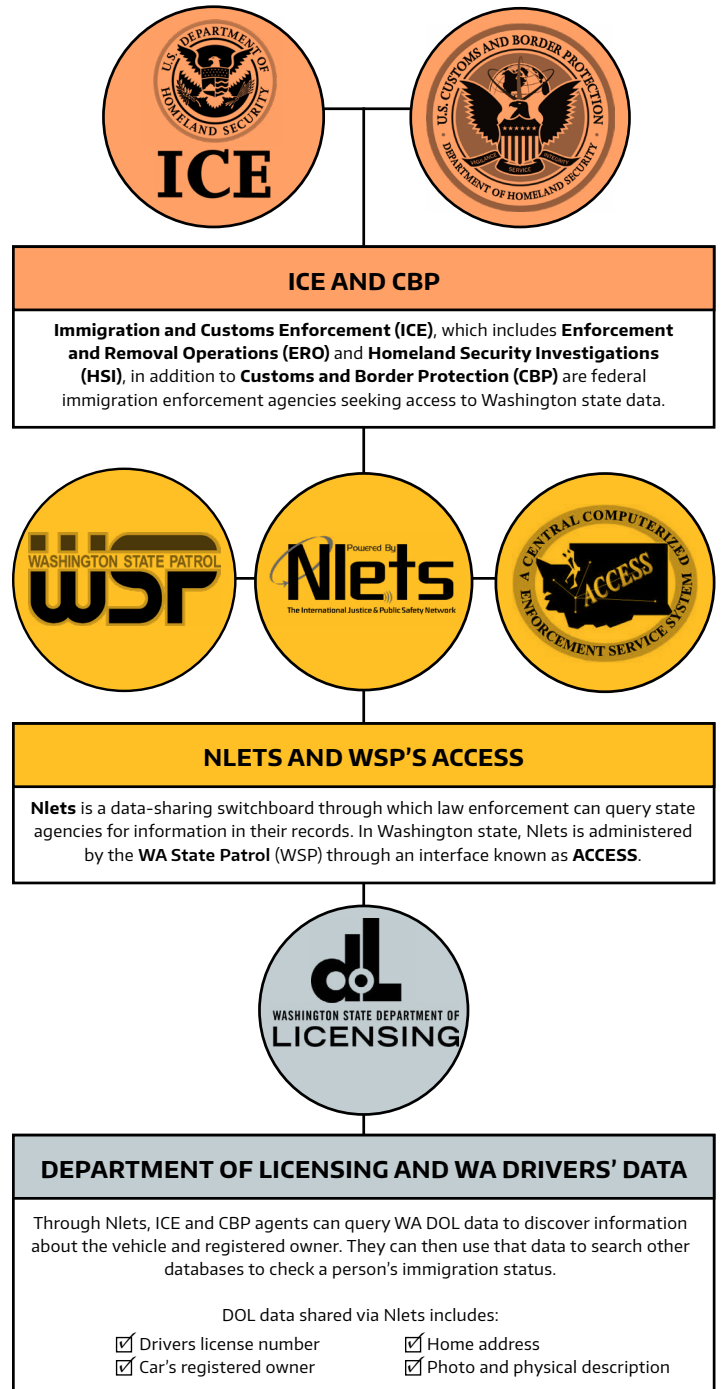


Figure 1: Chart showing how federal immigration enforcement agencies including ICE (and its sub-agencies ERO and HSI) and CBP access Washington Department of Licensing data through Nlets. Locally, Nlets queries are routed through a platform called ACCESS, administered by the Washington State Patrol.

can query information held in other institutions' systems of records, including federal databases such as the FBI's National Crime Information Center (NCIC), state departments of motor vehicles like Washington's DOL, and the records of an as-yet-undisclosed list of private companies.^{46, 47, 48} Responses to such queries are almost immediate: in 2020, Nlets boasted a message response time of 1.79 seconds.⁴⁹

Each agency which uses ACCESS does so through an Originating Agency Identifier (ORI) which is issued by the FBI.⁵⁰ Each ORI is a unique, nine-character alphanumeric code that identifies the specific law enforcement agency submitting the query; the first two digits identify the state in which the agency originates, and the third, fourth, and fifth digit indicate either the county in which the agency is located, or the initials of the federal agency of which they are a part.⁵¹

46 Per the Washington State Patrol's website, "ACCESS provides ...a means for agencies to query multiple state and national databases to include information systems provided by the Department of Corrections, Department of Licensing, Parks, the Washington Crime Information Center (WACIC), and the Washington State Identification Section (WASIS). The system also allows both national and international queries through the International Justice and Public Safety Information Sharing Network (NLETS) switch to include Interstate Identification Index (IJI) and the National Crime Information Center (NCIC) provided by the Federal Bureau of Investigation (FBI)." Washington State Patrol, "ACCESS", accessed 18 December 2025: <https://wsp.wa.gov/access/>

47 Nlets, "General Nlets Fact Sheet", October 2024: <https://nlets.org/sites/nlets/files/2024-10/General%20Nlets%20Fact%20Sheet%20Oct%202024.pdf>

48 As regards private companies, the extent of Nlets' partnerships is not publicly known. On its website, the organization says its "strategic partners" include a list of companies that "support law enforcement and first responders" (see Nlets, "Strategic Partners", accessed 7 January 2025: <https://nlets.org/communities/strategic-partners>); it also names some other organizations as "alliance partners" (see Nlets, "Alliance Partners", accessed 7 January 2025: <https://nlets.org/communities/alliance-partners>). But it is not clear what distinguishes these various levels of partnership, nor what actual activities partners engage in, and the statement that Nlets' partners "include" suggests that other partners may not be identified in public-facing communications. UWCHR researchers did not receive a response to their request for an interview with Nlets personnel.

49 Matt Butler, "Nlets Statistics 101", Nlets Blog, 27 May 2021: <https://nlets.org/resources/blog/nlets-statistics-101>

50 See ACCESS Operations Manual, "Issuance of ORIs," p. 10: <https://wsp.wa.gov/wp-content/uploads/2025/08/Chapter-1-Introduction.pdf>

51 This was explained to UWCHR researchers by DOL Deputy Director Alejandro Sánchez and is further elaborated in the NCIC Operating Manual, Originating Agency Identifier (ORI) File, p. 8: <https://site.utah.gov/dps-tac/wp-content/up->

Users of Nlets obtain information by querying member agencies' data repositories through "message keys."⁵² The network permits dozens of types of queries using these message keys, of thousands of databases maintained by local, state, and federal agencies across the nation. An Nlets user could input the name, driver license number, or license plate of a person of interest and obtain copious amounts of information about that individual, ranging from their criminal history; to what mobile devices are registered to their name; to whether they have hunting or fishing permits; are believed to be affiliated with a gang; are listed as an "Immigration Violator" in a set of records exclusively maintained by ICE at the FBI's National Crime Information Center⁵³; and more.⁵⁴

[loads/sites/38/2017/10/ORI.pdf](https://nlets.org/sites/38/2017/10/ORI.pdf)

52 The types of queries possible for Nlets users in the State of Washington can be viewed by filtering the "Nlets Message Key Map" available on the Nlets website: <https://nlets.org/resources/maps/message-keys/location>; a print version of the list for Washington state can be accessed at the following link: <https://nlets.org/resources/maps/bylocationagency/print-view/message-keys/B8F5ED1B-0B99-4F2C-974C-F3F487A8B721>

53 For more on the Immigration Violator Files maintained by the FBI's National Crime Information Center (NCIC), see this 2022 description by the Department of Justice: "The Immigration Violator File contains records of criminal aliens whom U.S. immigration authorities deported for drug or firearms trafficking, serious violent crimes, or both; information on aliens who have outstanding administrative warrants for removal from the United States and who have unlawfully remained in the United States; and records of aliens who have outstanding administrative warrants for failure to comply with national security registration requirements. Only the Department of Homeland Security's Bureau of Immigration and Customs Enforcement can enter records into the Immigration Violator File." Federal Bureau of Investigation, "Privacy Impact Assessment for the National Crime Information Center", 7 November 2022, p. 5: <https://www.fbi.gov/file-repository/pias/pia-ncic-020723.pdf/view>. While the Immigration Violator file chapter of the WSP ACCESS User Manual appears to have been uploaded to the agency's website in 2024, and notes it was last updated in 2021, its description of the Immigration Violator file only mentions information about criminal cases in the file, see Washington State Patrol, "ACCESS User Manual, Chapter 15: Immigration Violator File", Marc 2021: <https://wsp.wa.gov/wp-content/uploads/2024/02/Chapter-15-Immigration-Violator-File.pdf>. However, WSP's representative to Nlets indicated in a February 26, 2025 announcement that over 700,000 *civil* warrants were uploaded to this file in February alone. Email from Wes Vradenburg, "Subject: Administrative Immigration Warrants", 26 February, 2025: <https://wsp.wa.gov/wp-content/uploads/2025/02/02-26-2025-Administrative-Immigration-Warrants-1.pdf>

54 Significantly, Nlets does not permit bulk downloads of data; it would not be possible, for example, for federal authorities to use the system to obtain a dataset of all Washingtonians who drive a certain type of vehicle or match a given

How Nlets Works



Figure 2: Depiction of Nlets functioning from a 2023 training slideshow.⁵⁵

While Nlets (and its Washington switchboard operator, the WSP's ACCESS) therefore serve as entry-points to a vast array of data, they are particularly useful to federal immigration agencies as ways to obtain information about drivers and vehicles. We know this because federal authorities have said so, multiple times, in documents and court proceedings.⁵⁶ For example, in a 2020 letter, Acting DHS Secretary Chad Wolf wrote, "DMV records have long been used by ICE law enforcement personnel to verify or corroborate an investigatory targets' Personally Identifiable Information (PII), which can include their residential address, date of birth, height, weight, eye color, hair color, facial photograph, license plate, and vehicle registration information. Moreover, ICE's expeditious retrieval of vehicle and driver 's license and identification information has helped identify targets, witnesses, victims, and assets."⁵⁷

Documents submitted in court proceedings in New York state include a 2019 statement by ICE that "DMV photograph information is used to compile photograph line ups to be used in the field or during interviews, and while conducting facial recognition searches to identify individuals or targets. Furthermore, license plate number identification is used in tracking with both automated license readers and physical surveillance. The ability to retrieve vehicle and driver's license/ identification information in near real-time assists in identifying possible targets, witnesses,

physical description, because the system is set up to respond only to individual queries (although the same query can be sent simultaneously to multiple states, and a series of individual queries could lead to the download of data to be then stored in a mass database to search later).

55 Michelle Kiefer, "What is Nlets and What Information Do We Provide?" Nlets, 2023. <https://isp.illinois.gov/StaticFiles/docs/LawEnforcementResources/2023%20Illinois%20NLETS%20Conference.pdf>

56 Document 43-1, filed Apr. 24, 2020, in Lewis-McCoy, et al. v. Wolf, et al., Case 1:20-cv-01142-JMF, S.D.N.Y., p. 31: <https://jstis.washington.edu/humanrights/wp-content/uploads/sites/22/2026/01/Court-docs-re-NY-GreenLight-law.pdf>

57 See Department of Homeland Security, "Letter from Acting Secretary Chad Wolf to New York State Department of Motor Vehicles", 5 February 2020: https://www.dhs.gov/sites/default/files/publications/20_0206_as1-letter-to-ny-dmv-signed.pdf; while Wolf's letter was referring to the importance of DMV records held by New York State, there is no reason to believe ICE/ CBP are any less interested in this same information about Washingtonians.

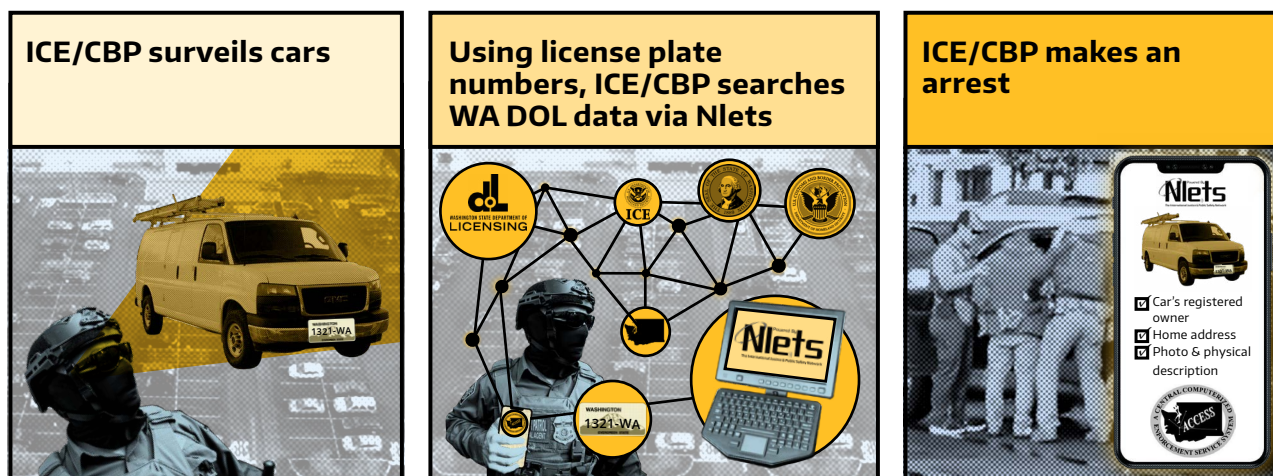


Figure 3: Depiction of how ICE and CBP use Nlets as a tool for surveillance, querying license plates and cross referencing drivers' information with other databases to determine whether to subject someone to immigration enforcement.

victims, and assets...The ICE Enforcement and Removal Operations (ERO) Targeting Operations Division (TOD) uses driver's license/DMV searches in varying ways to establish targetability, confirm identity and residence, and determine other relevant information, such as a subject's last known location."⁵⁸

In recent months, federal immigration enforcement agencies have made use of ACCESS/Nlets to query Washington DOL data about vehicles, primarily by conducting searches for information using license plate numbers. There are multiple "message keys" enabled for such queries, from RQ (Registration Query), RNQ (Vehicle Registration Query by Name), to QV and QW, which allow a user to input a license plate number or Vehicle Identification Number and receive all "person files" relating to the vehicle's registered owner, including civil warrants issued by ICE.⁵⁹

58 Document 43-1, filed Apr. 24, 2020, in Lewis-McCoy, et al. v. Wolf, et al., Case 1:20-cv-01142-JMF, S.D.N.Y., p. 31: <https://jsis.washington.edu/humanrights/wp-content/uploads/sites/22/2026/01/Court-docs-re-NY-GreenLight-law.pdf>

59 See p. 15 of Chapter 15 of the [ACCESS Operator Manual](#): "A QV or QW inquiry by license plate number or vehicle identification number will retrieve all person files as well as the Immigration Violator File in which the vehicle and/or license has been entered. Additionally, such an inquiry will retrieve data from the Vehicle, Boat, Vehicle/Boat Part, and License Plate Files. It is not necessary to include name in this type of inquiry." For more on ICE's issuance of civil immigration warrants and their accessibility using ACCESS/Nlets, see this February 2025 email by Wes Vradenburg of the WSP: <https://wsp.wa.gov/wp-content/up->

Recently, federal immigration officers gave sworn testimony in federal district court in Portland, Oregon, that they were conducting enforcement by travelling to areas they believed to be "target rich" and randomly running license plates of vehicles they came across to find out their owners' names, which they then checked against DHS databases. If the information returned suggested the vehicle's owner lacked documentation, they conducted an arrest right away, typically with no prior warrant.⁶⁰ Records reviewed by UWCHR researchers, including ICE documents and records of Nlets queries using ACCESS, show that similar tactics appear to be being deployed by immigration agents in Washington. (See "Confirmed cases," below.)

What all of this means is that ICE, CBP, and other agencies involved in immigration enforcement in our state, can stake out a given location—perhaps a Latino business or a Home Depot—and, using ACCESS/Nlets, run the license plates of all vehicles they see at that location to find out the name of their registered owner. They can also drive through our communities, noticing vehicles that appear to be involved

[loads/2025/02/02-26-2025-Administrative-Immigration-Warrants-1.pdf](https://wsp.wa.gov/wp-content/uploads/2025/02/02-26-2025-Administrative-Immigration-Warrants-1.pdf)

60 Maxine Bernstein, "ICE officers reveal arrest quotas, facial recognition use in Oregon dragnet", The Oregonian/OregonLive, 4 December 2025: <https://www.oregonlive.com/crime/2025/12/ice-officers-reveal-arrest-quotas-facial-recognition-use-in-oregon-dragnet.html>

in construction, or which have drivers whose appearance captures their attention, and run the license plate numbers for those vehicles through ACCESS/Nlets to find out their owners' names. Once they have a name, they can look up that person's immigration status,⁶¹ and proceed to arrest the driver while in traffic, or travel to their registered address to arrest them on a subsequent day.

It would be equally possible for agents to use automated license plate readers to virtually stake out a given location, obtain the license plate numbers of passing vehicles, and run those numbers against databases without being physically present on site. However, this does not appear to have been the tactic used in the cases reviewed to date by UWCHR.

CONFIRMED CASES

To date, UWCHR has confirmed the following nine cases in which immigration arrests followed queries by Originating Agency Identifiers (ORIs) associated with ICE or CBP of Washington drivers' data via Nlets and the Washington State Patrol's ACCESS system:

- On August 22, ICE records show that ICE ERO, ICE HSI, and USBP officers went to a residential address in Edmonds to look for an individual they believed to be undocumented. WSP records show that a registration query was performed on his vehicle's license plate by an ORI associated with CBP at 7:55 am that morning, generating a response from the WA DOL. ICE records note that he was apprehended around 8:30, after the agents parked outside the house saw him arrive, noted his license plate, and then followed him when he pulled out

into the road again after briefly retrieving something from the house. He was taken to the Northwest Detention Center. It is not known why this person was targeted for civil immigration enforcement; he has a pending I-130 application to adjust his status on the basis of a family member with US citizenship or residency, and no criminal record.

- On September 20, ICE records show that ICE ERO, ICE HSI, and CBP agents observed a truck and, according to the documents, "Seattle ERO conducted a registration query on a 2103 Ford F-150 with Washington license plate number XXXXXXXX". WSP records show that at around 9:55 am that morning, a registration query was indeed performed on the listed license plate, but by an ORI associated with CBP, rather than ERO. According to the ICE record of his arrest, "DHS database queries on the registered owner of the vehicle yielded positive results for immigration violations." When the agents saw a man enter the vehicle who matched the physical description "based on a photo obtained through database checks," they began following the vehicle, eventually pulling it over in Puyallup. The man was taken to the Northwest Detention Center.
- On September 22, ICE records show that a team of ICE ERO and CBP agents spotted a construction van; Washington State Patrol records released to UWCHR show that an ORI associated with CBP looked up its license plate number via Nlets and obtained information on its registered owner from the WA DOL. Upon learning his name, the agents ran it through their own databases, determining his presence in the United States was unauthorized. ICE agents then carried out a traffic stop in Burien, WA, and took him into custody, eventually sending him to the ICE detention center in Tacoma. He had no criminal record and had had no previous contact with immigration authorities.

⁶¹ Because Nlets allows queries of NCIC data, which includes immigration violations, this is possible without leaving the Nlets system, although ICE records reviewed by UWCHR suggest that ICE agents often use names of registered vehicle owners to query other databases, described as "DHS databases" in their records.

- On October 4, ICE records state that an arrest team of ICE ERO, ICE HSI, and CBP located a vehicle and agents conducted a registration query using the car's license plate, obtaining the registered owner's name. The records state that they then searched that name in "DHS databases," finding "derogatory immigration history." However, WSP records released to UWCHR show that these queries originated from an ORI linked to CBP, not ICE; they also show subsequent queries about the individual within WSP's system. According to ICE records, the arrest team followed the vehicle in traffic, eventually conducting a traffic stop in Tacoma, where they took the driver into custody.
- On October 7, ICE records show that a team "consisting of ERO Seattle officers, Homeland Security Investigations Special Agents, Customs and Border Protection Officers, and Border Patrol Agents" came across a Ford truck in Seattle, WA, and conducted a registration query using its license plate number. WSP records released to UWCHR show that this query was conducted at 7:09 am by an ORI associated with CBP. According to the ICE documentation of his arrest, at around 7:45 am the agents witnessed a man "matched the description of the registered owner of the vehicle," get into the car. DHS database queries of the owner's name "yielded positive results for previous immigration encounters," so they followed the vehicle and eventually conducted a traffic stop, taking its driver into custody near the Southcenter mall. He was later sent to the Northwest Detention Center in Tacoma.
- Washington State Patrol records released to UWCHR show that on October 30, 2025, an ORI associated with CBP conducted a vehicle registration query, inputting a Washington license plate number and obtaining information about its owner from the WA DOL. On November 4, shortly after leaving his home in Renton, the car's owner reported that he was pulled over and arrested in an act of civil immigration enforcement. The agents had their faces covered and drove unmarked vehicles; without asking for his identification or asking any questions, they already knew his name. The agents handcuffed him and drove him to a darkened parking lot, where they handed him over to another team of unknown agents who applied a different set of handcuffs, this time cuffing his wrists in front of his body rather than behind. These agents then took the man to a third parking lot of a Ross store, and from there to the ICE offices in Tukwila. Throughout this time he asked repeatedly to see a warrant for his arrest, but was shown nothing. He was eventually taken to the Northwest Detention Center.
- On November 10, 2025, Washington State Patrol records show that an ORI associated with CBP conducted a vehicle registration query, inputting the license plate number of a white work van to obtain the name of its owner from the WA DOL. Hours later, the vehicle was spotted abandoned near the Auburn airport; journalist Jaime Mendez posted a photograph on social media in hopes of alerting family members to their loved one's arrest.
- On November 13, 2025, in Renton, a CBP ORI conducted a query using the license plate number of a brown work van to obtain the name of its owner from the WA DOL. The vehicle was found abandoned hours later on the side of the road in Renton.
- On November 16, 2025, a Washington resident was in Gresham, Oregon, for work, and had just left a Latino grocery store when ICE officers spotted him. ICE records state that they were in the area "performing systems checks on vehicles moving near the location of a targeted subject." Washington State Patrol records show that an ORI associated with ICE then ran the license

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*****
*
** Message Record Number: 40596032085903
** Code 10(b)
** Date: 11/16/2025 9:48:56 AM
** UTCDate: 11/16/2025 5:48:56 PM
** MKE: RQ
** Event: Input Message
** Code 10(b)
** ORI: CAICE08T0
--MESSAGE--

```

Nlets users query data through "message keys" that target a specific type of information from a specific state agency. The message key RQ refers to a Vehicle Registration Query.

The ORI, or originating requester identifier code, shows which user is performing the Nlets query. According to Nlets ORI descriptions, the querying user here is ICE.

Under state law certain information may be redacted when responding to a record request. The redaction code 10(b) refers to personal information not including criminal history.

Code 10(b)

```

*****
*
** Message Record Number: 40596032085906
** Code 10(b)
** Date: 11/16/2025 9:48:56 AM
** UTCDate: 11/16/2025 5:48:56 PM
** MKE: RQ
** Event: Output Message
** Code 10(b)
** ORI: WADOL0000
--MESSAGE--

```

Washington state DOL responds to ICE's query.

The redaction code 10(b) refers to personal information not including criminal history, code 15 refers to motor vehicle registration information.

Code 10(b)

Code 15

Figures 4-5: Records obtained from the Washington State Patrol show a Vehicle Registration Query ("RQ") was performed via Nlets/ACCESS on November 16, 2025 by an ICE ORI on the license plate of a Washington state resident; Washington's DOL responds with the driver's personal information. The driver was subsequently arrested by ICE.

plates of his vehicle, obtaining his personal information from the WA DOL (see Figures 4-5). Once they had his name, ICE records shared with UWCHR show they ran it through ICE's own databases, determining that he lacked authorization to be in the United States. They pulled over his vehicle and arrested him on the spot. He told UWCHR researchers that in the course of

his arrest, he was pistol-whipped, tased him, and sprayed pepper spray in his eyes at close range. When a UWCHR researcher later visited him in the ICE detention center in Tacoma, his injuries, including the marks left by four taser blasts, were still visible on his body, and his eyesight had yet to return to normal.

VIOLATIONS OF STATE LAW AND AGENCY POLICY

These practices run afoul of both DOL and WSP policy. The DOL explicitly bars the use of information from its databases for civil immigration enforcement. WSP's ACCESS—the means through which Nlets users obtain data from DOL—is only authorized for criminal justice purposes,⁶² yet in the majority⁶³ of the cases documented here, private information from DOL records was tapped via ACCESS for purposes of civil immigration enforcement.

Multiple state laws prohibit this practice. As noted above, the Keep Washington Working Act of 2019 prohibits the use of state government “funds, facilities, property, equipment, or personnel to investigate, enforce, cooperate with, or assist in the investigation or enforcement” of federal immigration law.⁶⁴ This law applies both to the WA DOL and WSP.⁶⁵

62 The ACCESS Operations Manual states, “Information obtained via ACCESS can only be used by criminal justice agencies for criminal justice purposes.” Washington State Patrol, “ACCESS Operations Manual”, accessed 7 January 2025, p. 7: <https://wsp.wa.gov/wp-content/uploads/2025/08/Chapter-1-Introduction.pdf>; further, “If an agency suspects an employee of obtaining information from any of the systems available through ACCESS for non-criminal justice purposes, the ACCESS Section must be immediately notified.”

63 In two of the cases mentioned above, UWCHR was able to confirm that a search of DOL records preceded the person's arrest, but lack access to ICE records or other sources that would allow us to draw conclusions about whether the arrest was civil or criminal in nature.

64 See RCW 43.17.425, “Immigration and citizenship status—State agency restrictions.” <http://app.leg.wa.gov/RCW/default.aspx?cite=43.17.425>

65 Indeed, WSP's apparent violation of this law is not limited to the provision of access to WA DOL data. The WSP's ACCESS platform also supports queries of the NCIC's “Immigration Violator File,” which federal and out-of-state law enforcement agencies queried some 13,349 times from January 1 to November 30, 2025, according to data released by WSP pursuant to public record request R016616-110925.

In addition to Keep Washington Working, other state laws impose restrictions on the release of driver and vehicle data from DOL records. [RCW 46.12.630](#), prohibits the use of motor vehicle information for surveillance of “Washington residents solely on the basis of race, religion, immigration, or citizenship status, or national or ethnic origin.”⁶⁶ Further, [RCW 46.12.630](#) (7) reads, “If a list of registered and legal owners of motor vehicles or vessels is used for any purpose other than that authorized in this section, the recipient ...will be denied further access to such information by the department of licensing.” Underscoring the gravity of unauthorized disclosure, the law even raises the possibility of criminal sanctions against those engaging in the dissemination or use of motor vehicle data for unauthorized purposes.⁶⁷

66 See [RCW 46.12.630](#), Section 2(b), which reads “The department of licensing may furnish lists of registered and legal owners of motor vehicles or vessels, only to the entities and only for the purposes specified in this section, to...Any governmental agency, including any court or law enforcement agency, or any private person or entity acting on behalf of a federal, state, or local agency, or Canada in carrying out its functions: PROVIDED, HOWEVER, That nothing in this section is construed to allow actions prohibited under [RCW 43.17.425](#).”

67 [RCW 46.12.640](#), states that, in addition to revoking the privilege of accessing such data in the future, “The unauthorized disclosure of personal or identity information...is a gross misdemeanor punishable by a fine not to exceed ten thousand dollars, or by imprisonment in a county jail for up to three hundred sixty-four days, or by both such fine and imprisonment for each violation.” However, the statute appears aimed at punishing disclosure based on false pretenses, so criminal sanctions would be unlikely to apply in the cases documented here.

WASHINGTON DESERVES BETTER

WASHINGTON HAS CHOSEN NOT TO FOLLOW THE LEAD OF OTHER STATES IN PROTECTING DATA PRIVACY

Washington state has responded to past concerns about federal agencies' access to DOL data by saying it would limit the information searchable via Nlets, deciding to make social security numbers or birthplace information inaccessible via that platform.⁶⁸ But even here, Washington has done less than other states. According to Nlets, four states and the District of Columbia have limited drivers' license photo sharing via Nlets;⁶⁹ Washington still allows it.⁷⁰ And based on ICE's own statements about how it uses DMV data, it's clear that drivers' photos are of much more use to them than birthplace or the presence or absence of a social security number.

68 In a June 17, 2025 meeting with community advocates, WA DOL Deputy Director Alejandro Sánchez explained that because there are legitimate law enforcement purposes for Nlets, Washington's DOL has chosen to address threats to immigrants' data privacy by limiting access by all Nlets users to information that could flag documentation status, such as a person's social security number or country of birth. This point is further echoed in the DOL's public statement on July 21: "It is important to understand that this system does not contain information about individuals' immigration status." While it makes sense to recognize the potential uses of this information in particular, it does nothing to block the primary way federal immigration agents are known to be using Nlets: according to sworn testimony in federal court, ICE records, and the cases documented in this report, the primary utility of the Nlets switchboard is for conducting queries of driver and vehicle data, not birthplace information.

69 WA DOL's Deputy Director has said that the information on the Nlets website may be inaccurate about photo-sharing; he emphasized that of the states identified as not sharing photos, he was only certain that California had actually stopped the practice. However, the [letter from Sen. Wyden and colleagues](#) says that nine states are not sharing photos. Clearly more transparency is needed on this point.

70 See state-by-state NISP-DL sharing status via the Nlets Initiatives & Projects Map here: <https://nlets.org/resources/maps/initiatives/key>

Furthermore, at least one state has taken action to block both ICE and CBP from accessing any of their state's DMV data. Washington has not. New York's "[Green Light](#)" law, passed in 2019, prevents the state's Department of Motor Vehicles from disclosing drivers' data to "any agency that primarily enforces immigration law or to any employee or agent of such agency" absent a lawful court order or judicial warrant.⁷¹ As a result, the state took action to terminate both ICE and CBP's access to DMV data via Nlets by blocking their ORI codes, and further warned all other law enforcement agencies that their sharing of data with those agencies would result in a loss of access as well.⁷² In response, the federal government briefly suspended the Trusted Traveler program for applicants from New York, but it later admitted in court to having made false statements about the impact of New York's law and reinstated the program.⁷³ In 2025, the federal government sued New York over the "Green Light" law, but lost in court.⁷⁴

New York's law also goes further by requiring the state's DMV to inform undocumented New Yorkers if a federal immigration agency requests their information,⁷⁵ and made it possible for

71 The New York State Senate, "Bill S1747B", 2019-2020 Legislative Session, <https://www.nysenate.gov/legislation/bills/2019/S1747>

72 "U.S. Immigration and Customs Enforcement Response to Operational Assessment of State Laws Restricting the Sharing of Department of Motor Vehicle Information with DHS" (U.S. Immigration and Customs Enforcement, Jan. 14, 2019), pp. 18-25 of Document 43-1, filed 24 April 2020, in *Lewis-McCoy, et al. v. Wolf, et al.* (1:20-cv-01142-JMF) (S.D.N.Y.), p. 18. See also U.S. Department of Homeland Security, "Myths vs. Facts Green Light Law," accessed 29 December, 2025: https://www.dhs.gov/sites/default/files/publications/20_0221_green-light-law-myths-facts.pdf

73 Scott Neuman, "DHS Restores New York To Trusted Traveler Program, Admits False Statements In Lawsuit", Georgia Public Broadcasting, 24 July 2020: <https://www.gpb.org/news/2020/07/24/dhs-restores-new-york-trusted-traveler-program-admits-false-statements-in-lawsuit>

74 Document 32, filed 23 December 2025 in *United States of America v. State of New York et al.* (1:25-cv-00205-AMN-MJK) (N.D.N.Y.) https://fingfx.thomsonreuters.com/gfx/legal-docs/movabdolnpa/newyork_lawsuit.pdf

75 Associated Press, "Judge green lights NY driver's license law, rejecting a Trump administration challenge", Politico, 24

felony charges to be brought against any law enforcement officer who shares DMV data with ICE or CBP.⁷⁶ No such provision exists in Washington.

Other states have also suspended ICE's, but not CBP's, access to drivers' data through Nlets. In Minnesota, since the passage of its 2023 law granting access to drivers' licenses to all qualified Minnesotans, the state's DPS⁷⁷ is not allowed to share information about individuals who have applied for or received a Class D driver's license with ICE unless DPS is ordered by a court to do so.⁷⁸ And in Massachusetts, the Attorney General promulgated the [regulation of the state's Work and Family Mobility Act of 2023](#) barring access to RMV⁷⁹ records by ICE except where ICE presents a judicial warrant.⁸⁰

December 2025: <https://www.politico.com/news/2025/12/24/judge-green-lights-ny-drivers-license-law-rejecting-a-trump-administration-challenge-00705736>

76 Hannah Buehler, "Green Light Law amendment: Officers can be charged with felony", WKBW, 22 May 2020: <https://www.wkbw.com/news/local-news/green-light-law-amendment-officers-can-be-charged-with-felony>

77 In MN, Driver and Vehicle Services (their "DMV") is part of the Division of Public Safety. See <https://dps.mn.gov/news/dvs-getting-minnesotans-ready-drivers-license-all>

78 See Immigrant Law Center of Minnesota, "Fact Sheet: Driver's Licenses for All—March 2023", 15 March 2023: <https://www.ilcm.org/latest-news/fact-sheet-drivers-licenses-for-all-march-2023/>; and Andrew Hazzard, "Could Trump use Driver's License for All data for deportations? Minnesota officials say protections are in place as applications roll in", Sahar Journal, 15 November 2024: <https://sahanjournal.com/immigration/drivers-license-for-all-minnesota-undocumented-trump-deportation/>

79 In MA, the Registry of Motor Vehicles (RMV) is part of the Department of Transportation (or MassDOT).

80 The language of the regulation reads, "Any information or record disclosed pursuant to Section 7 of Chapter 81 of the Acts of 2022 may be disclosed only insofar as it is not to be used for the purpose of enforcing federal immigration law or provided to an agency that primarily enforces immigration law, unless the Registrar is provided with a lawful court order or judicial warrant signed by a judge appointed pursuant to Article III of the United States Constitution. Any information or record disclosed pursuant to Section 7 of Chapter 81 of the Acts of 2022 may be disclosed only insofar as it is not to be used for the purpose of enforcing federal immigration law or provided to an agency that primarily enforces immigration law, unless the Registrar is provided with a lawful court order or judicial warrant signed by a judge appointed pursuant to Article III of the United States Constitution." Code of Massachusetts Regulations, "REGULATIONS AUTHORIZING DISCLOSURE OF MASSACHUSETTS LICENSE OR LEARNER'S PERMIT APPLICANT OR HOLDER INFORMATION", 940 C.M.R. 37.00, accessed 7 January 2025: <https://www.mass.gov/>

According to WA DOL, one of the reasons that Washington has declined to block CBP's access to WA DOL data was because CBP uses Nlets to verify the Enhanced Drivers' Licenses of Washingtonians seeking to cross the Canadian border without a passport. As the DOL wrote in July 2025, "For example, if the Department of Licensing did not share any licensing information with federal agencies, it would likely compromise Washingtonians' ability to use their Enhanced Drivers Licenses for travel. Washingtonians trying to cross the Canadian border might not be able to do so without their passport. People who had used their Enhanced Driver Licenses to cross the border could find themselves stuck in Canada if this system suddenly shut down."⁸¹

Yet New York's Enhanced Drivers' License program⁸² has continued despite the state's recent implementation of data privacy protections. Preserving the program in Washington should not come at the expense of Washingtonians' lives and liberties.

[doc/regulations-authorizing-disclosure-of-massachusetts-license-or-learners-permit-application-or-holder-information/download](#)

81 Kristin Goodwillie, "Washington state agency under fire for sharing drivers' data with ICE", King 5, 21 July 2025: <https://www.king5.com/article/news/investigations/investigators-washington-state-license-agency-under-fire-for-sharing-drivers-data-with-ice/281-c38e5569-b500-4f19-9a2c-660af-77a4fc9>

82 U.S. Department of Homeland Security, "Enhanced Drivers Licenses: What Are They?", 27 April 2023: <https://www.dhs.gov/enhanced-drivers-licenses-what-are-they>

OTHER OPTIONS LEFT UNEXPLORED

There may be other possible solutions to this problem. Nlets is configured in such a way that users query data through 68 different “message keys,” or data requests, each of which targets a specific type of information from a specific state agency.⁸³ Some of these queries are only available in some states; for example, Amber alerts, according to Nlets, are only in use in fourteen states, and only sixteen states enable the checking of vehicles’ VIN numbers via Nlets.⁸⁴ Some message keys are for broad purposes like accessing an individual’s criminal history, and others for less frequently necessary tasks, such as verifying snowmobile ownership or determining the location of railroad crossings.

There is, therefore, a wide range of existing query possibilities, and no reason—other than cost and convenience⁸⁵—that a new message

83 See Nlets, “Nlets Message Keys”, accessed 19 December 2025: <https://nlets.org/resources/maps/message-keys/key>

84 Roy Chancellor, “Nlets News: Mobile Device Lookup Service Now Available”, Nlets Blog, 24 May 2022: <https://nlets.org/resources/blog/nlets-news-mobile-device-lookup-service-now-available>

85 A representative of Washington State Patrol confirmed that this would be possible, but emphasized that it would be costly and complicated in terms of the programming changes it would require across the Nlets network: “The Nlets governing body (all states and territories) would have to approve the creation of the key and the associated costs to Nlets. While the number is slowly growing, there are currently only a handful of states restricting access to their DOL data in the manner that we are. Getting them all to agree to the cost may prove difficult. Every state and territory would have to have programming changes to their message switches to pass this traffic. Every state’s equivalent to our Department of Licensing would have to make programming changes to their systems for the new key. Every agency in the country who wants to be able to utilize the new message key would need to make changes to their Computer Aided Dispatch and/or Records Management Systems...Every federal agency that we want to restrict to this level of access would require programming changes to their systems to utilize this new message key and ingest the returns.” (Communication between Chris Loftis and Angelina Godoy, December 12, 2025). Yet given that presumably only CBP and the WA DOL would have a need to exchange information about WA Enhanced Licenses due to the need to verify licenses at border crossings, it is unclear why all law enforcement jurisdictions across the nation would need to reprogram their systems. Further, Nlets introduced its mobile device key in 2022 (see prior footnote); the network’s website says it is only in use in 9 states (<https://nlets.org/resources/maps/message-keys/key>), suggesting that the introduction of new keys without universal adoption is already happening.



IT APPEARS THAT WHAT IS LACKING IS NOT THE TECHNICAL CAPACITY, BUT THE POLITICAL WILL TO ENSURE THE PRINCIPLES OF EQUALITY, DATA PRIVACY, AND PERSONAL LIBERTY THAT WASHINGTON HAS LONG CLAIMED TO VALUE ARE ACTUALLY UPHELD IN PRACTICE.

key could not be introduced that would enable users to query only the data pertaining to Enhanced Drivers’ Licenses, which are REAL ID compliant. Since by definition, undocumented Washingtonians are not eligible for Enhanced Drivers’ Licenses, there would be no danger that data from a query bounded in this way could be used for civil immigration enforcement.

It appears that what is lacking is not the technical capacity, but the political will to ensure the principles of equality, data privacy, and personal liberty that Washington has long claimed to value are actually upheld in practice.

RESTORING PUBLIC TRUST

Despite concerted research by UWCHR and other parties, the actual operations of Nlets—and other mechanisms for data-sharing between Washington state and the federal government—remain opaque in many regards. After years of expressions of community concern, years of efforts by independent researchers to understand our state’s data-sharing practices—and years of defensive declarations in response to piecemeal revelations—the time has come for a full accounting of how, and to and for whom, our state’s data is shared with federal agencies.

Nlets keeps a log of all message traffic. As the organization itself explains, “There is a treasure trove of archived data for any query on the network that can be used for investigations, with

appropriate authorization. It's called RAND—Retrieval of Archived Nlets Data. Nlets manages a log of message traffic that travels through our network."⁸⁶ Similarly, the Washington State Patrol's Operation Manual notes that ACCESS preserves a log of all transactions—sent and received—for the past 6 years. This is referred to as a journal log.⁸⁷ If Washington is serious about restoring trust in our state authorities' management of private data, it should make this archive of historical Nlets usage available for analysis by trustworthy independent researchers, and commit to making the changes necessary to ensure the abuses documented in this report—as well as any others uncovered in such an audit—do not continue.



HOW LONG WILL WASHINGTONIANS TOLERATE THE REPEATED EXCUSES AND PARTIAL REMEDIES OFFERED BY OUR STATE'S DEPARTMENT OF LICENSING, WHEN THE PATTERN OF ABUSE IT PERMITS IS LAID BARE?

RECOMMENDATIONS

All Washingtonians benefit from the ability to navigate public roadways alongside licensed and insured fellow drivers. We all benefit from living in a state where parents feel free to drop their children off at school, where workers can arrive at their places of employment, and neighbors

gather to share meals, worship, or participate in other activities in their communities. While Washington's commitment to supporting immigrants has never promised to forestall the enforcement of federal immigration priorities within our state, it has enabled our state to prioritize safe access to public services and spaces, including our roads and highways, for all people.

The types of enforcement we have seen in recent months—warrantless arrests by unidentified masked men driving unmarked vehicles, sometimes accompanied by acts of shocking violence—threaten the civil liberties of all Washingtonians. But they also suggest racially-motivated acts targeting Washingtonians of color, especially members of the Latine community and those with apparent connections to the construction industry. State law prohibits such acts of rank discrimination. How long will Washingtonians tolerate the repeated excuses and partial remedies offered by our state's Department of Licensing, when the pattern of abuse it permits is laid bare?

To address the abuses documented here, Washington should:

- Immediately block all Nlets searches of DOL data from ORIs associated with ICE (including both HSI and ERO) and CBP.
- Commit to a process of accountability, involving affected families, for the harms caused by the data-sharing documented in this report.
- Commit to real transparency about data-sharing by state agencies. This should begin with the provision of a journal log of all ACCESS transactions for the past 6 years to independent researchers—with appropriate agreements in place to protect Washingtonians' privacy—to permit fuller understanding of the complete range of data sharing between state and federal authorities.

⁸⁶ Nlets, "10 Things You May Not Know About Nlets", Nlets Blog, 30 September 2021: <https://nlets.org/resources/blog/10-things-you-may-not-know-about-nlets>
⁸⁷ See https://www.wsp.wa.gov/_secured/access/docs/operations_manual/01_intro.pdf p. 19

APPENDIX: PUBLIC RECORDS REQUESTS

Because Nlets is accessed via Washington State Patrol's ACCESS system in Washington State, searches constitute public records. Figures and cases described in this report were obtained via the following public records requests to Washington State Patrol. Because Nlets access is typically controlled by state agencies, similar information should be obtainable in other states depending on local public records laws.

For data on total number of responses to Nlets queries:

- I request the number of responses to requests/queries of Nlets data via WSP ACCESS, by each ORI corresponding to a federal agency, in the following categories from [date] to [date]: Driver License Queries (DQ), Driver License Query by Name (DNQ), Immigration Alien LESC query (IAQ), License Plate Reader Query (LPQ), Vehicle Registration Query (RQ), Vehicle Registration Query by Name (RNQ).

For data on searches by name and/or license plate:

- I request all DNQ, IAQ, or RNQ queries for the name [#####] and all LPQ, RQ, or photo queries for the WA license plate [#####] in the Nlets system using WSP's ACCESS from [date] to [date].



Roadside Assist: Washington State's Continued Sharing of Drivers' Information with Federal Immigration Enforcement

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