UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

JUAN SEBASTIÁN CARVAJAL-MUÑOZ, Plaintiff, v. JACK CORY RAVENCAMP, *et al.*, Defendants.	Civil No. 2:26-cv-00190-JCN

NOTICE OF SUBSTITUTION

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 2679(d), the United States is hereby substituted for defendants Daisy I. Angulo, James Peters, Jack Cory Ravencamp, John Stalnik, and Javaka Y. Thompson with respect to Plaintiff's state-law claims. The grounds for the substitution are:

1. Plaintiff alleges that Officers Angulo, Peters, Ravencamp, Stalnik, and Thompson ("Defendants") violated Maine law while they were employed by the U.S. Department of Homeland Security ("DHS") and U.S. Immigration and Customs Enforcement ("ICE") and acting as part of an immigration enforcement operation initiated and managed by those agencies. ECF No. 33, First Amended Complaint ("FAC"), ¶¶ 3, 11-15, 19, 127-65. Counts I-V assert that Officers Angulo, Ravencamp, and Thompson unlawfully stopped Plaintiff's vehicle without reasonable suspicion, arrested him without probable cause, targeted him for arrest based on his race, removed him from his car using unreasonable force, and unreasonably prolonged his detention in violation of the Maine Civil Rights Act, 5 Maine Revised Statutes ("M.R.S.") § 4682. FAC ¶¶ 127-65. Count V also asserts that Officers Peters and Stalnik transported Plaintiff

in a van and unreasonably prolonged Plaintiff's detention in violation of the Maine Civil Rights Act. FAC ¶¶ 158-65. The claims against Defendants in Counts I-V arise under Maine law.

2. The Federal Tort Claims Act, 28 U.S.C. §§ 1346(b); 2671-2680 (2012) ("FTCA"), as amended by the Federal Employees Liability Reform and Tort Compensation Act of 1988 § 5, Pub. L. No. 100-694, 102 Stat. 4563 (1988), provides that a suit against the United States shall be the exclusive remedy for persons with claims for damages resulting from the negligent or wrongful acts or omissions of federal employees taken within the scope of their office or employment. *See* 28 U.S.C. § 2679(b)(1).

3. The FTCA also provides that upon certification by the Attorney General that a federal employee was acting within the scope of his office or employment at the time of the incident out of which the plaintiff's claim arose, any civil action or proceeding commenced upon such a claim and arising under state law shall be deemed an action against the United States, and the United States shall be substituted as the defendant with respect to those claims. 28 U.S.C. § 2679(d)(1), (2). Certification authority has been delegated to the United States Attorneys and the Directors of the Civil Division's Torts Branch. 28 C.F.R. § 15.4.

4. Jonathan D. Guynn, Acting Director, Torts Branch, Civil Division, United States Department of Justice, has certified that Officers Angulo, Peters, Ravencamp, Stalnik, and Thompson were employees of the government acting in the scope of office or employment at the time of the incident out of which the Plaintiffs' claims arose.

For the foregoing reasons, the United States has been substituted as the sole defendant with respect to the state-law claims for relief alleged against Officers Angulo, Peters, Ravencamp, Stalnik, and Thompson in the First Amended Complaint. The Court is respectfully referred to the attached Certification of Scope of Employment. An order amending the caption of

this case to reflect the substitution of the United States has been tendered for the Court's convenience.

Dated: September 25, 2026

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

JONATHAN D. GUYNN
Deputy Assistant Attorney General
Torts Branch

PAUL E. WERNER
Assistant Director, Torts Branch

/s/ John B. F. Martin
JOHN B. F. MARTIN
Senior Trial Attorney
United States Department of Justice
Torts Branch, Civil Division
P.O. Box 7146, Ben Franklin Station
Washington, D.C. 20044-7146
Tel: (202) 616-4492
Email: john.b.martin@usdoj.gov

/s/ Anna-Drake Stephens
ANNA-DRAKE STEPHENS
Trial Attorney
United States Department of Justice
Torts Branch, Civil Division
P.O. Box 7146, Ben Franklin Station
Washington, D.C. 20044-7146
Tel: (202) 255-7805
Email: anna-drake.stephens@usdoj.gov

Counsel for Defendant United States

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2026, the foregoing **Notice of Substitution** was filed electronically and served upon all counsel of record through ECF/CM.

/s/ John B. F. Martin
JOHN B. F. MARTIN
Senior Trial Attorney

United States Department of Justice
Torts Branch, Civil Division
P.O. Box 7146, Ben Franklin Station
Washington, D.C. 20044-7146
Tel: (202) 616-4492
Email: john.b.martin@usdoj.gov

Counsel for Defendant United States