



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
MARK D. LEVINE

October 9, 2026

George S. Barrett
Chair, Governance & Sustainability Committee
Board of Directors
Target Corporation
c/o Corporate Secretary
1000 Nicollet Mall, TPS-2670
Minneapolis, MN 55403

Dear Mr. Barrett,

I am writing to express grave concern regarding Target's management and oversight following the deeply disturbing shooting by immigration and enforcement agents in the Marble Hill neighborhood of New York City on Thursday, October 8, 2026. The parking lot at your Marble Hill facility has reportedly been used by U.S. Immigration and Customs Enforcement (ICE) for staging activities. The shooting of an unarmed man through his vehicle window while a five-year-old child sat in the back seat should horrify everyone, and underscores the urgency of my concerns regarding your company's relationship with ICE.¹

As Comptroller of the City of New York, I serve as investment adviser to, and custodian and a trustee of, the five New York City retirement systems ("the Systems"). The Systems are substantial long-term Target shareholders. I write to request that the Governance & Sustainability Committee immediately commission and oversee an independent, third-party human rights risk assessment focused on Target's interactions with federal law-enforcement agencies, including how the company manages risks associated with the use of its property, facilities, and security practices.

The Marble Hill incident demands a swift and clear accounting of any and all coordination between Target and ICE through a robust independent review to assure shareholders and the public that the company is closely monitoring the use of its property and resources.

¹ AP News, "Immigration agent shoots a man during arrest in New York City," Oct. 8–9, 2026.
<https://apnews.com/article/new-york-shooting-federal-agents-c0fd349ab75c176f15fc410df1d59814>

Target, as a large national retailer, maintains comprehensive security and asset-protection practices that at times involve interactions with public authorities. Target's published privacy statements indicate that the company may assist law enforcement and respond to legal or regulatory inquiries and may disclose information when necessary to comply with law or to protect the rights and property of guests, the company, or others.²

While these practices serve legitimate purposes, the Marble Hill incident illustrates how corporate property may become entangled in high-risk enforcement activity, with potential implications for human and civil rights. These concerns underscore the need for explicit governance mechanisms and Board oversight to ensure that Target's policies and practices align with its stated commitments.

Target's 2024 Form 10-K describes increasing stakeholder scrutiny of data privacy, cybersecurity, human capital, and sustainability, and outlines Board and committee oversight of information security and data-privacy risks.³ When law enforcement operations occur in proximity to Target stores, the intersection of physical security, community impact, and human rights considerations place added responsibility on the committee's oversight.

I am encouraged that Target's human rights commitments align with leading international frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs).⁴⁵ These principles emphasize assessing both actual and potential human rights impacts arising from business operations and relationships, including foreseeable downstream uses of corporate property or data. This includes situations in which retail property becomes involved, intentionally or unintentionally, in aggressive enforcement actions.

² Target Connected Privacy Policy, <https://tgtfiles.target.com/connected/ConnectedPrv.html>; <https://corporate.target.com/hr-privacy>; Target Wireless Terms of Use, <https://www.target.com/c/target-wireless-terms-of-use/-/N-4sr7o>; Target Legal & Privacy, <https://www.target.com/guest-privacy/legal-privacy>

³ Target 2024 Annual Report, Item 1A: Risk Factors. <https://corporate.target.com/investors/annual/2024-annual-report/10-k-report/10-k-part-i/item-1a-risk-factors>; SEC index: <https://www.sec.gov/Archives/edgar/data/27419/000002741924000032/0000027419-24-000032-index.htm>

⁴ Target Human Rights Statement. <https://corporate.target.com/sustainability-governance/people-thriving-team-communities/responsible-supply-chains/human-rights>

⁵ Target Supply-Chain Human Rights Policy. <https://corporate.target.com/sustainability-governance/people-thriving-team-communities/responsible-supply-chains/human-rights/policies>

Given the specialized nature of these risks and the heightened public attention following the Marble Hill shooting I believe the Board, as well as all long-term investors, would benefit from an independent, third-party assessment providing clarity on:

- How Target evaluates and manages risks associated with law enforcement presence or operations on or near company property;
- Target's protocols for engaging with law enforcement agencies, including limits, safeguards, and escalation procedures;
- The categories of information or security-related support that may be provided to authorities, and the governance structures overseeing such interactions;
- How the Board exercises oversight of potential civil rights and human rights impacts arising from enforcement activity near Target stores; and
- Any gaps between stated commitments and practice that may expose the Company to legal, operational or reputational risks.

An independent assessment—along with disclosure of its non-proprietary findings—would reinforce Target's governance, support alignment with its stated commitments, and mitigate long-term risk for shareholders.

As Chair of the Governance & Sustainability Committee, you are responsible for oversight of the Company's ESG, sustainability, and human rights-related commitments. I respectfully urge you to ensure that the Committee exercises that oversight by commissioning and supervising this assessment.

Thank you for the Board's consideration. I look forward to your response and welcome the opportunity for further discussion. Please contact Michael Garland, Assistant Comptroller for Corporate Governance and Responsible Investment, at mgarlan@comptroller.nyc.gov to arrange a meeting.

Sincerely,



Mark D. Levine
New York City Comptroller

cc: Board of Directors