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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

Los Angeles Press Club, NewsGuild -
 Communications Workers of America,
 Sean Beckner-Carmitchel, Ryanne
 Mena, Lexis-Olivier Ray, Charles Xu,
 Benjamin Adam Climer, and Abigail
 Olmeda,

Plaintiffs,

v.

Kristi Noem, in her official capacity as
 Secretary of Homeland Security; U.S.
 Department of Homeland Security,

Defendants.

Case No. 2:25-CV-05563-HDV-E

**DECLARATION OF RYAN
 SHAPIRO IN SUPPORT OF
 PLAINTIFFS' PRELIMINARY
 INJUNCTION**

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Declaration of Ryan Shapiro

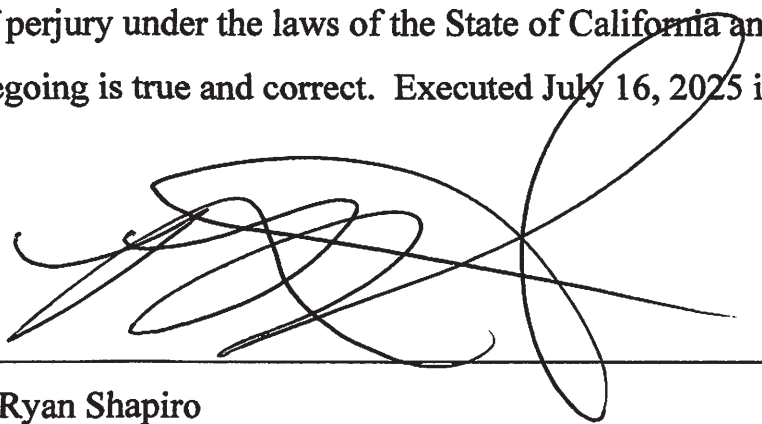
I, Ryan Shapiro, hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows.

2. I am the Executive Director of Property of the People, a Washington, D.C.-based nonprofit specialist organization dedicated to the pursuit of governmental transparency in the service of democracy. Supreme Court Justice William O. Douglas declared, “a democracy cannot function unless the people are permitted to know what their government is up to.” Through public records requests, other research methodologies, and expert analysis, Property of the People works to provide precisely this knowledge.

3. On June 23, 2025, I submitted a public records request for certain law enforcement documents on behalf of Property of the People. On June 24, 2025, Property of the People received documents responsive to that request. Included with the documents produced was the DHS bulletin attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed July 16, 2025 in Santa Cruz, California.



A handwritten signature in black ink, appearing to read 'Ryan Shapiro', is written over a horizontal line. The signature is highly stylized and cursive.

Ryan Shapiro

EXHIBIT A

OFFICER AWARENESS

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(U) RECENT ANTI-LAW ENFORCEMENT TACTICS USED IN UNLAWFUL CIVIL UNREST

(U) OVERVIEW

(U//FOUO) This assessment addresses law enforcement safety issues from identified tactics used during recent 1st Amendment protected demonstrations, and unlawful civil unrest, targeting Law Enforcement. U.S. Immigration and Customs Enforcement (ICE) immigration enforcement operations have become a highly sensitive and prevalent issue throughout the nation, while garnering much media attention. Therefore, it is highly likely that anti-ICE and other Federal Law Enforcement Officers (LEOs) events will continue to occur throughout the nation.

(U) BACKGROUND

(U//FOUO) On June 6, 2025, ICE carried out a series of immigration enforcement raids in the Fashion District of Los Angeles, California. While these enforcement actions were in progress, information began to circulate in the local community and individuals flocked to the area to impede ICE operations. Shortly after, individuals and groups assembled and held demonstrations outside of the Edward R. Roybal Federal Building and U.S. Courthouse, in downtown Los Angeles. Since this day, numerous demonstrations and civil unrest activities have occurred nationwide, leading to the arrests of numerous violent offenders (VO), and resulting in multiple LEOs sustaining injuries.

(U) TACTICS

(U//FOUO) Below are common tactics used by demonstrators and VOs. Many of these tactics have been used during recent demonstrations and civil unrest activities in multiple locations across the nation. We anticipate that any success displayed in one city will be adopted by VOs in another city.

(U) Weapons

(U//LES) Everyday objects and easily attainable items - e.g., bricks, rocks, bottles, lasers, skateboards, strobe lights, and other bright lights are used as weapons or become improvised weapons during unlawful civil unrest. Other items such as paint-filled fire extinguishers, tear gas, smoke grenades, commercial grade fireworks and firearms, have or may also be used by VOs. Easy to make items may include Molotov cocktails and VOs may utilize innocuous support vehicles containing weapons and supplies.

- (U//FOUO) The use of green lasers has been used for numerous demonstrations leading to injuries to the eyes of LEOs. Specifically, in Portland, Oregon it was reported that there were 113 eye injuries from lasers.ⁱ
- (U//FOUO) The carrying of a cinder block by VOs allows them to break off pieces and throw them at officers. Some VOs may have cinder blocks placed in specific areas, or along marching routes, to have a readymade improvised weapon close at hand.^{ii,iii}
- (U//FOUO) Reporting indicates a there is circulating video, being viewed by VOs, which provides instruction on how to empty fire extinguishers and refill them with paint. These paint-filled extinguishers

(U//FOUO) All information contained within this product was obtained through open source, law enforcement and intelligence community channels and is unclassified; however, this report is to be handled as LAW ENFORCEMENT SENSITIVE. It may be disseminated to those within the law enforcement, security and intelligence community who have a need-to-know. At no time is any of this information to be provided to the general public or any individual or organization associated with a media affiliate.

For immediate reporting of incidents or suspicious activities, contact the 24-hour number for FPS call (877) 437-7411

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can then be used to vandalize buildings or to spray LEOs, ultimately blinding them and/or impeding their movements.^{iv}

- (U//FOUO) On Saturday, June 7, 2025, an individual was arrested, and charged with possessing of an unregistered destructive device, because he threw a Molotov cocktail at LEOs. In another incident, an individual was identified carrying a Molotov cocktail and a lighter; and while trying to flee the scene, the individual allegedly threw the device at the LEOs.^v

(U) Assaults

(U//LES) Assault on LEOs can occur in a variety of ways, including the utilization of standardized and/or improvised weapons. Black Bloc tactics (wearing all black attire), to conceal the offender's identity is commonly used when conducting assaults and vandalism.

- (U//FOUO) News media reports from Los Angeles on June 10, 2025, an anti-ICE demonstrator was distributing boxes of "Bionic [Face] Shields" to other individuals. During an event on this same day in New York City, New York, many demonstrators were observed wearing Black Bloc attire.^{vi}

(U) Vandalism and Property Damage

(U//LES) Vandalism and property damage such as arson, graffiti, slashed vehicle tires, looting and damage to businesses and law enforcement resources, destruction of security equipment, and broken windows and doors, are common crimes associated with civil unrest.

- (U//FOUO) On June 10, 2025, the Senator Paul Simon Federal Building in Carbondale, Illinois was vandalized by demonstrators who were gathered outside of the facility.^{vii,viii}
- (U//FOUO) On June 12, 2025, in Tucson, Arizona outside an ICE office, VOs threw balloons filled with paint at security officers and spray-painted anti-ICE graffiti on gates and walls.^{ix}
- (U//FOUO) On Saturday, June 8, 2025, reports state that VOs lit numerous vehicles on fire and looted numerous businesses overnight.^x

(U) Barricades

(U//LES) Barricades present a problem for LEOs, impeding their ability to easily apprehend criminals and VOs. These barricades can lead to the kettling of LEOs, which restricts and confines their movements, thus leaving them more susceptible to being assaulted. Various objects can be used as a barricade, such as benches, shopping carts, trash bins, cinder blocks, and much more.

- (U//FOUO) Since the beginning of the demonstrations in Los Angeles, there have been reports of individuals using motorcycles, dumpsters, park benches, and zip tied bikes as barricades to impede LE movements.^{xi}

(U) Surveillance

(U//LES) A wide variety of surveillance methods can be used to identify LEOs and their positions or assets. Surveillance allows demonstrators to develop and strategize methods to interact with or intercept LEOs. Additionally, surveillance allows for the identification of alternate routes for evading LEOs, identifying targets for acts vandalism or damage, and accessing easily attainable items to be used as weapons.

- (U//FOUO) Methods include drones, bicyclists, skateboarders, or scouts on foot.
- (U//FOUO) On June 10, 2025, near a Walmart in Phoenix, Arizona, a drone operator posted video footage of ICE agents conducting enforcement operations.
- (U) Social media is also being utilized as a format for individuals to share videos to get more people involved in their ideological movements, or for surveillance sharing.^{xii}

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(U) Threats to LEOs

(U//LES) One of the most common methods of threatening LEOs comes from online doxing (doxxing), releasing private identification of an individual online for nefarious purposes. Other tactics include, hoax bomb threats, livestreaming LEO interactions, following LEOs to their vehicles, offices, and hotels.

- (U//FOUO) Various sources report that demonstrators are actively identifying hotels being utilized by LEOs and then subsequently harassing them, while also trying to interrupt their sleep by using bullhorns and playing loud music.^{xiii,xiv} Additionally, there have been reports of bomb threats against ICE field offices across the nation.^{xv}
- (U//FOUO) Saturday, June 8, 2025, VOs threw rocks, blocks of cement, electric scooters, and shot commercial grade fireworks from an overpass at LEOs assembled below the roadway.^{xvi}

(U) ANALYSIS

(U//FOUO) Because of the large amount of media attention, the sensitive topic of immigration enforcement, and controversy surrounding the deployment of US military personnel, we assess with a high likelihood that demonstrations and civil unrest will continue to occur at federal facilities in the near term. It is expected that additional demonstrations will continue and grow across the nation. We also assess with high likelihood that currently planned demonstrations addressing different topics and issues may shift to demonstrations concerning immigration enforcement actions and an embracement of anti-ICE messaging.

(U//FOUO) We assess demonstrators and VOs may try to generate media attention by utilizing various tactics and/or attempting to engage LEOs to provoke a response. Individuals, or groups, who desire to implement an attack on LEOs may not distinguish between different law enforcement agencies and may conduct an attack if such an opportunity exists. Further, individuals most likely will use social networking sites and apps to quickly mobilize and coordinate activities, making it difficult for law enforcement to intercept and prepare a response in advance.

(U) SUSPICIOUS ACTIVITY & PROTECTIVE MEASURES

(U//FOUO) Federal facilities are symbols of the American federal government and are often viewed as desirable targets. An attack on a federal facility can occur in a variety of ways and is only limited to the imagination of the individual(s) who are planning, coordinating, and executing the attack. Law enforcement officers and security personnel must remain vigilant for any threats and properly report any suspicious activity occurring in, and around, federal buildings and assets.

(U//FOUO) Activities by LEOs considered as a best practices are:

- (U) Remain observant for indicators of suspicious behavior that may reasonably indicate criminal activity;
- Explore procurement and use of laser-defeating goggles or glasses to protect the eyes of LEOs when attacked with lasers
- (U) Observe and report on individuals showing prolonged interest in security apparatus, discreet use of cameras, note taking, testing security;
- (U) Be cognizant of unusual attempts to gain sensitive information about countermeasures, HVAC systems, and security measures;
- (U) Use variably-timed interior and exterior patrols to deter perceived vulnerabilities, thwart the ability to time an attack, detect suspicious activity and prevent unauthorized entry;
- (U) Evaluate the effectiveness of countermeasures from the point of view of an adversary;
- (U) Actively enforce parking regulations and investigate illegally parked vehicles - particularly in buffer zones;
- (U) Employ Operation Shields and targeted patrols using a risk-based deployment model.

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For further queries regarding this bulletin or questions regarding the dissemination process, please contact:
Federal Protective Service, Intelligence Operations Division
FPSINTEL@fps.dhs.gov

ⁱ (U) Nelson, S. (August 4, 2020). Federal officers in Portland suffered 113 eye injuries from lasers, DHS official says. New York Post. Unclassified. Accessed on June 12, 2025, regional news organization. <https://nypost.com/2020/08/04/federal-officers-in-portland-suffered-113-eye-injuries-from-lasers-dhs/>.

ⁱⁱ (U) DuBose, J. (June 9, 2025). FBI identifies protester accused of throwing rocks at federal agents. KTLA5. Unclassified. Accessed on June 12, 2025. <https://ktla.com/news/local-news/1-a-protester-40-wanted-by-fbi-for-assault-on-federal-officer-identified/>.

ⁱⁱⁱ (U) Crane, E. (June 10, 2025) 'Worrying' footage shows anti-ICE protester doling out tactical gear in Los Angeles as violence escalates. New York Post. Unclassified. Accessed on June 12, 2025. <https://nypost.com/2025/06/10/us-news/footage-shows-anti-ice-protestor-doling-out-tactical-gear-in-los-angeles/>.

^{iv} (U//FOUO//LES) NYPD SENTRY (June 12, 2025). "SENTRY - Los Angeles, CA - Protests turned violent - civil unrest." (e-mail).

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^{viii} (U) Barry, L. (June 11, 2025) U.S. Attorney, FBI vow strong action after federal building defaced in Carbondale. U.S. Attorney's Office, Southern District of Illinois. Accessed on June 12, 2025, US Federal Agency. <https://www.justice.gov/usao-sdil/pr/us-attorney-fbi-vow-strong-action-after-federal-building-defaced-carbondale>.

^{ix} (U) Billeaud, J. (June 12, 2025). Protesters clash with security outside Tucson, Arizona, ICE office. Associated Press. Unclassified. Accessed on June 12, 2025, national news organization. <https://apnews.com/live/donald-trump-news-updates-6-12-2025#00000197-6561-d663-a5f7-7df11b540000>.

^x Putman, J. (9 Jun 2025). Officers hit with fireworks, cruisers pelted with rocks as L.A. protests escalate. Police1. <https://www.police1.com/federal-law-enforcement/officers-hit-with-fireworks-cruisers-pelted-with-rocks-as-l-a-protests-escalate>. Unclassified. Accessed on 13 June 2025, regional news organization.

^{xi} (U//FOUO//LES) NYPD SENTRY (June 12, 2025). "SENTRY - Los Angeles, CA - Protests turned violent - civil unrest." (e-mail).

^{xii} (U//FOUO) ICE Protesters Using Drones (June 12, 2025). (e-mail).

^{xiii} (U) Kurzweil, T. (June 12, 2025). Protesters attempt to disturb ICE agents at Los Angeles-area hotels. KTLA5. Unclassified. Accessed on June 12, 2025, regional news organization. <https://ktla.com/news/local-news/protesters-attempt-to-disturb-ice-agents-at-los-angeles-area-hotels/>.

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^{xv} (U//FOUO//LES) DHS HSI, "Officer Safety: Allegations of Improvised Explosive Devices Placed at ICE Field Offices", Tip Line Report (June 11, 2025): 1-4.

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