

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHICAGO HEADLINE CLUB,
et al.,
Plaintiffs,

v.

KRISTI NOEM, et al.,
Defendants.

)
)
)
)
)
)
)
)
)
)

No. 25-cv-12173

Hon. Sara L. Ellis,
District Judge

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF
PLAINTIFFS' NOTICES OF VIOLATIONS OF THE COURT'S
TEMPORARY RESTRAINING ORDER**

Plaintiffs, by and through their attorneys, respectfully supplement their Notice of Violations at Dkt. 94 (pertaining to the Little Village neighborhood on October 23, 2025) and Dkt. 188 (pertaining to Evanston, Illinois on October 31, 2025), and request that the Court take notice of the below additional facts regarding apparent violations of the Court's Modified Temporary Restraining Order, Dkt. 66.

1. First, Plaintiffs wish to bring to the Court’s attention another comment by Defendant Bovino regarding his deployment of tear gas in Little Village on October 23, 2025. This time Defendant Bovino stated that he uses “the least amount of force necessary,” and that “If I had more CS gas, I would have deployed it.”¹

2. The Court should also be aware of additional evidence regarding the profligate violence deployed by federal agents in Evanston, Illinois on October 31, 2025.

¹ CBS News, *Border Patrol commander Bovino defends tactics in Chicago immigration crackdown as Trump cheers* (Nov. 4, 2025) available at: <https://www.cbsnews.com/chicago/news/border-patrol-commander-gregory-bovino-defends-migration-crackdown-tactics/> (last accessed Nov. 4, 2025).

3. A video depicts a federal agent pointing his firearm at Plaintiff's declarant David Brooks and other non-violent onlookers not once, but twice, as he slams shoves a woman into his vehicle.² *See also* Dkt. 188 at ¶ 8. Then, once the woman is secure in the car, the agent comes around to the other side of the vehicle and participates in the brutalization of the young man that Plaintiffs' declarant Kerry Little describes. *See* Exhibit 136 (Littel Decl.) at ¶¶ 14–15. The same agent who pointed his gun at Mr. Brooks slams his knee into the back of a young man who is laying on the ground with his hands behind his back. Then this same agent opens the car door on this side of the vehicle and appears to kick at a detainee in the car.

4. The agent who did all this then reportedly drove around Evanston and Rogers Park for hours with the three U.S. Citizens who had been violently arrested, intermittently brake-checking other motorists and threatening to pepper spray the three arrestees.³ The three arrestees were ultimately dropped off at the Chicago FBI field office and released without charges.

5. The official Department of Homeland Security X.com account released a statement regarding Kerry Little's video (previously produced as Exhibit B to Little's Declaration⁴) depicting a federal agent repeatedly punching the young male arrestee. This statement claims that these "several defensive strikes" were "justifie[d] . . . responses" as they were necessary to free the agent's "genitals from the agitator's vise."⁵ Defendant Bovino has also adopted this explanation for the violence.⁶ However, Ms. Little's video clearly displays the

² @TheJFreakinC, X.com post (Oct. 31, 2025 at 6:43 pm), available at: <https://x.com/TheJFreakinC/status/1984405793001640085> (last accessed Nov. 4, 2025).

³ Hope Perry, Margo Milanowski and Alex Harrison, *Community members describe confrontation with federal agents*, Evanston RoundTable (Nov. 3, 2025) available at: <https://evanstonroundtable.com/2025/11/01/evanston-immigration-clash-car-crash/> (last accessed Nov. 4, 2025).

⁴ Available here: <https://spaces.hightail.com/space/hHtrXkj6em/files/fi-763e3f21-b5f1-48be-84ab-0c381fc703a6/fv-f5fcace9-950b-4846-8f29-ce0196554ec6/Exhibit%20B.mp4>

⁵ @DHS.gov, X.com Post, (Nov. 2, 2025 at 9:01 am) available at: <https://x.com/DHSgov/status/1984999303656436070> (last accessed Nov. 4, 2025).

⁶ @CMDROpAtLargeCA, X.com Post (Nov. 1, 2025 at 2:18 pm) available at: <https://x.com/CMDROpAtLargeCA/status/1984701685898625522> (last accessed Nov. 4, 2025) ("You leave out the

Kevin M. Fee, Jr.
Rebecca Glenberg
Hirsh Joshi
Priyanka Menon
**ROGER BALDWIN FOUNDATION
OF ACLU, INC.**
150 N. Michigan, Suite 600
Chicago, IL 60601
(312) 201-9740
kfee@aclu-il.org
rglenberg@aclu-il.org