

EXHIBIT 1

DECLARATION OF BRIA SCUDDER

I, Bria Scudder, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Deputy Governor for public safety, infrastructure, environment, and energy in the office of JB Pritzker, Governor of the State of Illinois. I make this declaration in support of Plaintiffs' motion for a temporary restraining order.

2. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

The Governor and the Illinois National Guard

3. As Deputy Governor, I speak frequently with the Governor regarding public safety planning for the State of Illinois. Additionally, in my role as Deputy Governor for public safety, I routinely speak with leaders of the Illinois National Guard. Specifically, I regularly communicate with Major General Rodney Boyd, the 41st Adjutant General of the State of Illinois and the Director of the Illinois Department of Military Affairs.

4. Illinois National Guard (ILNG) servicemembers and resources are integral to our State's disaster response strategy. For example, in 2019 and 2020, the Governor called members of the Illinois National Guard into active duty to respond to flooding. In 2020 and 2021, the Governor called members of the ILNG into active duty to respond to the COVID-19 pandemic. In 2022, the Governor called members of the Illinois National Guard into active duty to respond to winter storms. The Governor's ability to call up the Illinois National Guard ensures our State has the personnel, infrastructure, and equipment needed to protect the people of Illinois in those emergencies.

5. Illinois National Guard resources are limited. The deployment of members of the National Guard to Chicago or its surrounding suburbs for law enforcement purposes will seriously

impair the Governor's ability to respond to similar natural disasters, pandemics, and other emergencies that may occur.

6. On rare occasions, Governor Pritzker has activated the Illinois National Guard to assist local law enforcement in handling large-scale protest activity. For example, in 2020, Governor Pritzker activated 375 members of the Illinois National Guard after protests related to the killing of George Floyd resulted in significant property destruction in Chicago. On those occasions, the local municipality has specifically requested that Governor Pritzker deploy the Illinois National Guard to assist local law enforcement. Governor Pritzker has not received a request from any municipality to deploy the National Guard in response to the recent protest activity, including, but not limited to, the protest activity at the federal Immigration and Customs Enforcement (ICE) facility in Broadview, Illinois. Additionally, on the rare occasion that ILNG has been used in this way, the Illinois National Guard's role has been to support local law enforcement at a remove, not to replace or supplant them.

Interactions with the Trump Administration on the Deployment of the Guard

7. I understand that the President has made numerous statements in the media that he would like Governor Pritzker to request National Guard deployment to the City of Chicago for the ostensible purpose of fighting crime, including as recently as a September 2, 2025 press conference, where he stated, “. . . I would love to have Governor Pritzker call me . . . and say, we do have a problem, and we'd love you to send in the troops”^[1]

8. However, Governor Pritzker has made no request to the federal government for the activation of federalized National Guard troops to Illinois. Governor Pritzker has consistently

^[1] See <https://youtu.be/I8DnGstg2-k?t=1417>.

stated in public remarks that the deployment of the National Guard in Illinois is not needed and would be counterproductive.

9. On Saturday, September 27, 2025, I spoke with Major General Boyd by phone. Major General Boyd informed me that, earlier that day, he received a phone call from a representative of U.S. Northern Command (“NorCom”) and was asked whether the State would agree to voluntarily send Illinois National Guard troops to protect federal personnel and property at the ICE facility in Broadview, Illinois. Major General Boyd was asked to provide a response within twenty-four hours.

10. On the afternoon of Sunday, September 28, 2025, I spoke with Major General Boyd by phone. In that call, I informed Major General Boyd that Governor Pritzker would not agree to voluntarily send Illinois National Guard troops to protect the ICE facility in Broadview, because there were no past or current circumstances necessitating it. While there have been protests in the Village of Broadview outside the ICE facility there, the protests have been small. Broadview Police has coordinated with other state and local law enforcement resources to ensure that the protests have been appropriately managed. I requested that Major General Boyd convey this message to NorCom.

11. On the evening of September 28, 2025, I spoke with Major General Boyd by phone. He informed me that he had conveyed the substance of the message discussed above to NorCom.

12. At 2:58 p.m. on Monday, September 29, 2025, Major General Boyd forwarded me an email chain that he had received. A true and correct copy of the email chain forwarded to me by Major General Boyd on September 29 is attached hereto as Exhibit 1-A.

13. In the first email of the chain, sent at 1:07 p.m. on the same day by Colonel Javier Rosales of the National Guard Bureau to two members of the Illinois National Guard, Colonel

Rosales attached a memorandum from the U.S. Department of Homeland Security (the “DHS Memorandum”). A true correct copy of the DHS Memorandum is attached hereto as Exhibit 1-B.

14. The DHS Memorandum, dated September 26, 2025, was sent by Andrew Whitaker, Executive Secretary of the U.S. Department of Homeland Security, to Colonel Anthony Fuscellaro, Executive Secretary of the U.S. Department of Defense. The subject of the DHS Memorandum was, “Request for Assistance from the Department of War for Federal Facility Protection Support to the Department of Homeland Security (State of Illinois).” In the memorandum, Mr. Whitaker states that “DHS seeks DoW support to ensure the continued protection of federal facilities in Illinois,” and that “DHS requests deployment element of approximately 100 DoW personnel”

15. On the morning of Saturday, October 4, 2025, I spoke to Major General Boyd by phone. In that call, Major General Boyd stated that he had spoken to General Steven S. Nordhaus, Chief of the National Guard Bureau, at or around 10:19 a.m. on Saturday morning. In that call, General Nordhaus informed Major General Boyd that the Department of Defense was seeking 300 Illinois National Guard troops to be deployed in Title 32 status. General Nordhaus told Major General Boyd that if the State of Illinois would not provide the troops in Title 32 status, the troops would be federalized. General Nordhaus stated that Major General Boyd would receive an email with further details and asked that Major General Boyd acknowledge the email.

16. At 10:27 a.m. on Saturday, October 4, 2025, Major General Boyd forwarded to me an email that he had received from General Nordhaus at 10:23 a.m. A true and correct copy of the email forwarded to me by Major General Boyd on October 4 is attached hereto as Exhibit 1-C. To that email, General Nordhaus had attached a memorandum (“Title 32 Memorandum”). A true and correct copy of the Title 32 Memorandum is attached hereto as Exhibit 1-D.

17. The memorandum was from General Nordhaus to the Adjutant General of the Illinois National Guard. The subject of the Title 32 Memorandum was, "Request for Illinois National Guard Federal Protection Mission." The Title 32 Memorandum indicated that the President had directed the mobilization of at least 300 members of the ILNG to protect federal personnel, functions, and property in Illinois. The Title 32 Memorandum requested that the members serve in a non-federalized status under the command and control of Major General Boyd, pursuant to Title 32 United States Code, Section 502(f). However, the Title 32 Memorandum indicated that if ILNG forces were not mobilized under Title 32 within the next two hours, the Secretary of War would direct the mobilization of members of the ILNG under Title 10 of the United States Code.

18. Major General Boyd responded to General Nordhaus's email at 12:28 p.m. Central Time on October 4, informing him that Governor Pritzker would not call ILNG troops into Title 32 status, as there was no public safety need or other emergency necessitating it. A true and correct copy of that email is attached hereto as Exhibit 1-E. Major General Boyd's email also indicated that Governor Pritzker objected to the federalization of the National Guard. Major General Boyd forwarded a copy of the email that he had sent to General Nordhaus at 12:54 p.m. to me on Saturday, October 4.

19. On Saturday, October 4, at 6:15 p.m., Colonel Tony Fuscellaro, Executive Secretary of the Department of War, sent an email to Anne Caprara, Chief of Staff to Governor Pritzker. A true and correct copy of that email is attached hereto as Exhibit 1-F. To that email, Colonel Fuscellaro had attached a memorandum from the Secretary of War ("Title 10 Memorandum"). A true and correct copy of the Title 10 Memorandum is attached hereto as Exhibit 1-G.

20. The Title 10 Memorandum indicated that it was for the Adjutant General of the Illinois National Guard “through the Governor of Illinois.” The subject of the Title 10 Memorandum is, “Calling Members of the Illinois National Guard into Federal Service.” The Title 10 Memorandum stated that, on October 4, “the President of the United States called forth at least 300 National Guard personnel into Federal service pursuant to section 12406 of title 10, U.S. Code, to protect U.S. Immigration and Customs Enforcement, Federal Protective Service, and other U.S. Government personnel who are performing Federal functions, including the enforcement of Federal law, and to protect Federal property, at locations where violent demonstrations against these functions are occurring or are likely to occur based on current threat assessments and planned operations.” The Title 10 Memorandum indicated that the ILNG members will be called into federal service effective immediately for a period of 60 days.

21. On the evening of Sunday, October 5, Major General Boyd sent me an email attaching a Secretary of War Memorandum with the subject: “Calling Members of the Texas National Guard into Federal Service.” A true and correct copy of the email is attached hereto as Exhibit 1-H, and a true and correct copy of the Memorandum is attached as 1-I. The Memorandum was addressed to the Adjutant General of the Texas National Guard, through the Governor of Texas, and it explained that “[t]he President has authorized me to coordinate with you on the mobilization of up to 400 members of the Texas National Guard” under Title 10, specifically mentioning missions in the cities of Portland and Chicago.

22. Shortly after receiving this memorandum, at around 7:30 p.m., I spoke with Major General Boyd by phone. He explained that he was told by NorCom officials in a call at around 5:00 p.m. on October 5 that 200 Texas National Guard members would arrive in Illinois the next day, October 6. Major General Boyd was told that federal officials intend to deploy up to 500

National Guard members in Illinois, and his understanding was that this meant 200 Texas National Guard members plus 300 Illinois National Guard members. Major General Boyd explained that these 200 Texas National Guard members were being pulled off of border guard duty under Title 8. Based on his prior experience, Major General Boyd believed that because these National Guard members already were in active service, the timeline for having them in an active mission posture would be expedited, as compared to National Guard members who would need to be called into active duty.

* * *

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of October, 2025.

A handwritten signature in cursive script, reading "Bria Scudder", written in black ink. The signature is positioned above a horizontal line.

Bria Scudder
Deputy Governor
State of Illinois

SCUDDER DECLARATION
EXHIBIT 1-A

[External] FW: DHS RFA RECEIVED: DHS FPM SECURITY STATE OF ILLINOIS AND OREGON - [UNCLASSIFIED]

From EXT Boyd, Rodney [REDACTED]

Date Mon 9/29/2025 2:57 PM

To Scudder, Bria [REDACTED]

 1 attachment (1 MB)

OSD010654-25 GENERAL INCOMING.pdf;

UNCLASSIFIED

Good afternoon,

Per our conversation, please see the e-mail chain below from NGB.

v/r,
MG Boyd

From: Garrison, Matthew D COL USARMY NG ILARNG (USA)
[REDACTED]

Sent: Monday, September 29, 2025 2:50 PM

To: Boyd, Rodney C MG USARMY NG ILARNG (USA) [REDACTED]

Subject: FW: DHS RFA RECEIVED: DHS FPM SECURITY STATE OF ILLINOIS AND OREGON -
[UNCLASSIFIED]

Importance: High

UNCLASSIFIED

Sir –

See traffic in line from NGB. Rachael asked me to forward to you for review by the deputy governor.

COL Garrison

Office: [REDACTED]

UNCLASSIFIED

From: Bryant, Aaron M CPT USARMY NG ILARNG (USA) [REDACTED]

Sent: Monday, September 29, 2025 1:56 PM

To: Garrison, Matthew D COL USARMY NG ILARNG (USA)
[REDACTED]

Cc: Myers, Aaron N SMSgt USAF NG ILANG (USA) [REDACTED]

Subject: FW: DHS RFA RECEIVED: DHS FPM SECURITY STATE OF ILLINOIS AND OREGON -
[UNCLASSIFIED]

Importance: High

UNCLASSIFIED

Sir,

Noticed you were left off this email and just wanted to make sure you had this information if you haven't received already.

V/R

AARON M. BRYANT

CPT, FA, ILARNG

J35 Branch Chief

Office: [REDACTED]
[REDACTED]

UNCLASSIFIED

From: Myers, Aaron N SMSgt USAF NG ILANG (USA) [REDACTED]
Sent: Monday, September 29, 2025 1:47 PM
To: Bryant, Aaron M CPT USARMY NG ILARNG (USA) [REDACTED]
Subject: FW: DHS RFA RECEIVED: DHS FPM SECURITY STATE OF ILLINOIS AND OREGON - [CUI]
Importance: High

From: Rosales, Javier Jr COL USARMY NG NG J3-4-7 (USA) [REDACTED]
Sent: Monday, September 29, 2025 1:07 PM
To: Carter, Jason W COL USARMY NG ILARNG (USA) [REDACTED]; Kline, Casey J LTC USARMY NG ILARNG (USA) [REDACTED]
Cc: Myers, Aaron N SMSgt USAF NG ILANG (USA) [REDACTED]; Ruble, Derek T 1st Lt USAF NG ILANG (USA) [REDACTED]; Waldock, Jakin J COL USARMY NG NGB (USA) [REDACTED]; Chigi, Camille A Col USAF 1 AF (USA) [REDACTED]; Meredith, Heather J CIV USAF NGB A2/3/6 (USA) [REDACTED]
Subject: FW: DHS RFA RECEIVED: DHS FPM SECURITY STATE OF ILLINOIS AND OREGON - [CUI]
Importance: High

Good afternoon, Jason / Casey

Hope both of you are doing well. I just received the following attachment. Please review, we will have to begin the coordination process as soon as possible. I'll bring in both ARNG/ANG into the discussion if both services will be employed. Please send us any RFIs or give me a call when you get a chance. Our best POC for ARNG MOB is COL Jakin Waldock and ANG POCs Col. Chigi / Ms. Meredith. Thanks!

Javier

COL Javier Rosales
Chief, J-33 Current Operations Division
NGB J-3/4 Operations Directorate

National Guard Bureau
111 South George Mason Drive
Arlington, VA 22204

(O): [REDACTED] (C): [REDACTED]
(U): [REDACTED]
(S): [REDACTED]

UNCLASSIFIED

SCUDDER DECLARATION
EXHIBIT 1-B

Executive Secretary
U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

September 26, 2025

MEMORANDUM FOR: COL Anthony Fuscellaro
Executive Secretary
U.S. Department of Defense

FROM: Andrew J. Whitaker *AW*
Executive Secretary
U.S. Department of Homeland Security

SUBJECT: **Request for Assistance from the Department of War for
Federal Facility Protection Support to the Department of
Homeland Security (State of Illinois)**

Overview

The Department of Homeland Security (DHS) requests immediate and sustained assistance from the Department of War (DoW) in order to safeguard federal personnel, facilities, and operations in the State of Illinois. Federal facilities, including those directly supporting Immigration and Customs Enforcement (ICE) and the Federal Protective Service (FPS), have come under coordinated assault by violent groups intent on obstructing lawful federal enforcement actions. These groups are actively aligned with designated domestic terrorist organizations and have sought to impede the deportation and removal of criminal noncitizens through violent protest, intimidation, and sabotage of federal operations.

At the President's direction, DHS is seeking to put an end to the migrant invasion and these lawless riots. This further executes and follows the intent of past Executive Orders: (1) Executive Order Clarifying the Military's Role in Protecting the Territorial Integrity of the U.S. (20 Jan 2025), section 2; (2) Executive Order Declaring a National Emergency at the Southern Border of the U.S. (20 Jan 2025); (3) Executive Order Guaranteeing the States Protection Against Invasion (20 Jan 2025). Additional requests may follow as the situation develops.

DHS Overarching Goal

DHS seeks DoW support to ensure the continued protection of federal facilities in Illinois that are experiencing sustained unrest, thereby reinforcing the safety of federal personnel, safeguarding public property, and enabling uninterrupted execution of federal law enforcement missions.



Subject: Request for Assistance from the Department of War for Federal Facility Protection Support to the Department of Homeland Security (State of Illinois)

Page 2

Specific Topics for Request

DHS requests deployment element of approximately 100 DoW personnel, trained and equipped for mission security in complex urban environments. These personnel would integrate with federal law enforcement operations, serving in direct support of federal facility protection, access control, and crowd control measures.

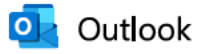
End of Mission

DHS requests that DoW-authorized support capabilities remain in place through the cessation of unrest and unlawful protests in Illinois.

Funding

DHS requests DoW provide support on a reimbursable basis.

SCUDDER DECLARATION
EXHIBIT 1-C




[External] FW: Request for Assistance of ILNG in T32 - [UNCLASSIFIED]

From EXT Boyd, Rodney [REDACTED]

Date Sat 10/4/2025 10:27 AM

To Scudder, Bria [REDACTED]

 2 attachments (112 KB)

CNGB Memo_IL TAG Re 502(f) for Federal Protection final.pdf; smime.p7s;

UNCLASSIFIED

Regards,

Rodney C. Boyd

Major General

Director, Department of Military Affairs

The Adjutant General/Commander, Illinois National Guard

Office: [REDACTED]

Cell: [REDACTED]

Email: [REDACTED]

UNCLASSIFIED

From: Nordhaus, Steven S Gen USAF NG OCNGB (USA) [REDACTED]

Sent: Saturday, October 4, 2025 10:23 AM

To: Boyd, Rodney C MG USARMY NG ILARNG (USA) [REDACTED]

Cc: Rieger, Timothy L MG USARMY NG OCNGB (USA) [REDACTED]

Subject: RE: Request for Assistance of ILNG in T32

Rod,

Here is the request for assistance of the ILNG in T32 to protect federal personnel, functions, and property in Illinois with a 2 hour suspense. Please acknowledge this email once received. I will follow up with a call as well in a few minutes.

VR,

Steve

Gen Steve Nordhaus

30th Chief, National Guard Bureau

Office: [REDACTED]

DSN: [REDACTED]

SCUDDER DECLARATION
EXHIBIT 1-D



NATIONAL GUARD BUREAU

1636 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-1636

MEMORANDUM FOR THE ADJUTANT GENERAL, ILLINOIS NATIONAL GUARD

SUBJECT: Request for Illinois National Guard Federal Protection Mission

1. I am writing to inform you that the President has directed the mobilization of at least 300 members of the Illinois National Guard (ILNG) to protect federal personnel, functions, and property in Illinois. However, the Secretary of War has been authorized to first provide additional federal funding for 300 members of the ILNG under Title 32 United States Code, Section 502(f), and request that they perform this mission in a non-federalized status under your command and control.
2. Due to the circumstances and immediate nature of this requirement, if ILNG forces are not mobilized under Title 32 in the next 2 hours, the Secretary of War will direct the mobilization of as many members of the ILNG as he may deem necessary under Title 10 United States Code.
3. The Department of War greatly appreciates your collaboration on this emergent situation. If your Governor agrees to a Title 32 mobilization of the ILNG, we will work with the Department of Homeland Security and other federal officials to coordinate mission details with you. To be clear, we believe time is of the essence and failure to mobilize sufficient forces quickly to address the situation may risk lives and property damage. I respectfully request that you inform me immediately if your Governor is unable or unwilling to mobilize the ILNG under Title 32 to perform the necessary protective functions.

STEVEN S. NORDHAUS
General, USAF
Chief, National Guard Bureau

SCUDDER DECLARATION
EXHIBIT 1-E

[External] FW: Request for Assistance of ILNG in T32 - [UNCLASSIFIED]

From EXT Boyd, Rodney [REDACTED]

Date Sat 10/4/2025 12:53 PM

To Scudder, Bria [REDACTED]

 1 attachment (6 KB)

smime.p7s;

UNCLASSIFIED

Per your request.

Regards,

Rodney C. Boyd

Major General

Director, Department of Military Affairs

The Adjutant General/Commander, Illinois National Guard

Office: [REDACTED]

Cell: [REDACTED]

Email: [REDACTED]

UNCLASSIFIED

From: Nordhaus, Steven S Gen USAF NG OCNGB (USA) [REDACTED]

Sent: Saturday, October 4, 2025 12:29 PM

To: Boyd, Rodney C MG USARMY NG ILARNG (USA) [REDACTED]

Cc: Rieger, Timothy L MG USARMY NG OCNGB (USA) [REDACTED]

Subject: RE: Request for Assistance of ILNG in T32 - [UNCLASSIFIED]

UNCLASSIFIED

Rod,

Acknowledge.

VR,

Steve

Gen Steve Nordhaus

30th Chief, National Guard Bureau

Office: [REDACTED]

DSN: [REDACTED]

UNCLASSIFIED

From: Boyd, Rodney C MG USARMY NG ILARNG (USA) [REDACTED]

Sent: Saturday, October 4, 2025 1:28 PM

To: Nordhaus, Steven S Gen USAF NG OCNGB (USA) [REDACTED]

Cc: Rieger, Timothy L MG USARMY NG OCNGB (USA) [REDACTED]

Subject: RE: Request for Assistance of ILNG in T32 - [UNCLASSIFIED]

UNCLASSIFIED

Sir,

The Governor will not call National Guard troops into Title 32 status. There is no public safety need or other emergency requiring the National Guard and, therefore, the

Governor objects to the federalization of the National Guard.

Regards,

Rodney C. Boyd

Major General

Director, Department of Military Affairs

The Adjutant General/Commander, Illinois National Guard

Office: [REDACTED]

Cell: [REDACTED]

Email: [REDACTED]

UNCLASSIFIED

From: Nordhaus, Steven S Gen USAF NG OCNGB (USA) [REDACTED]

Sent: Saturday, October 4, 2025 10:23 AM

To: Boyd, Rodney C MG USARMY NG ILARNG (USA) [REDACTED]

Cc: Rieger, Timothy L MG USARMY NG OCNGB (USA) [REDACTED]

Subject: RE: Request for Assistance of ILNG in T32

Rod,

Here is the request for assistance of the ILNG in T32 to protect federal personnel, functions, and property in Illinois with a 2 hour suspense. Please acknowledge this email once received. I will follow up with a call as well in a few minutes.

VR,

Steve

Gen Steve Nordhaus

30th Chief, National Guard Bureau


Office: [REDACTED]

DSN: [REDACTED]

SCUDDER DECLARATION
EXHIBIT 1-F

Fw: Secretary of War Memorandum through Governor of Illinois

From Caprara, Anne [REDACTED]
Date Sun 10/5/2025 12:17 PM
To Scudder, Bria [REDACTED]

 1 attachment (124 KB)
SecWar Memo to IL_04Oct25.pdf;

Get [Outlook for iOS](#)

From: Fucellaro, Anthony COL SD [REDACTED]
Sent: Saturday, October 4, 2025 5:15 PM
To: Pritzker, JB [REDACTED] [REDACTED] Caprara, Anne
[REDACTED]
Cc: EXT Boyd, Rodney [REDACTED]
Subject: [External] Secretary of War Memorandum through Governor of Illinois

Governor Pritzker,
Please see the attached memorandum from Secretary of War, Pete Hegseth.

Please also confirm receipt. Thank you.

v/r,
COL Tony Fucellaro, USA
Executive Secretary
Department of War
Rm. 3E877
Main Line: [REDACTED]
NIPR Group Distro: [REDACTED]
SIPR Group Distro: [REDACTED]
JWICS Group Distro: [REDACTED]

State of Illinois - CONFIDENTIALITY NOTICE: The information contained in this communication is confidential, may be attorney-client privileged or attorney work product, may constitute inside information or internal deliberative staff communication, and is intended only for the use of the addressee. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify the sender immediately by return e-mail and destroy this communication and all copies thereof, including all attachments. Receipt by an unintended recipient does not waive attorney-client privilege, attorney work product privilege, or any other exemption from disclosure.

SCUDDER DECLARATION
EXHIBIT 1-G



**SECRETARY OF WAR
1000 DEFENSE PENTAGON
WASHINGTON, DC 20301-1000**

OCT - 4 2025

**MEMORANDUM FOR THE ADJUTANT GENERAL, ILLINOIS NATIONAL GUARD
THROUGH: THE GOVERNOR OF ILLINOIS**

SUBJECT: Calling Members of the Illinois National Guard into Federal Service

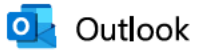
On October 4, 2025, the President of the United States called forth at least 300 National Guard personnel into Federal service pursuant to section 12406 of title 10, U.S. Code, to protect U.S. Immigration and Customs Enforcement, Federal Protective Service, and other U.S. Government personnel who are performing Federal functions, including the enforcement of Federal law, and to protect Federal property, at locations where violent demonstrations against these functions are occurring or are likely to occur based on current threat assessments and planned operations.

This memorandum further implements the President's direction. Up to 300 members of the Illinois National Guard will be called into Federal service effective immediately for a period of 60 days. The Chief of the National Guard Bureau will immediately coordinate the details of the mobilization with you, in coordination with the Chairman of the Joint Chiefs of Staff and Commander, U.S. Northern Command. The mobilized Service members will be under the command and control of the Commander, U.S. Northern Command.

A large, handwritten signature in black ink, appearing to be "P. B. G.", is located on the right side of the page. The signature is stylized and includes a long horizontal line extending to the right.

cc:
Chairman of the Joint Chiefs of Staff
Chief, National Guard Bureau
Commander, U.S. Northern Command
Under Secretary of Defense for Policy
Under Secretary of Defense for Personnel and Readiness

SCUDDER DECLARATION
EXHIBIT 1-H



[External] SecWar Memo to TXNG - [UNCLASSIFIED]

From EXT Boyd, Rodney [REDACTED]

Date Sun 10/5/2025 7:25 PM

To Scudder, Bria [REDACTED]

 1 attachment (819 KB)

SecWar Memo to TX_05OCT25_Signed.pdf;

UNCLASSIFIED

Memo attached.

Regards,

Rodney C. Boyd

Major General

Director, Department of Military Affairs

The Adjutant General/Commander, Illinois National Guard

Office: [REDACTED]

Cell: [REDACTED]

Email: [REDACTED]

UNCLASSIFIED

SCUDDER DECLARATION
EXHIBIT 1-I



SECRETARY OF WAR
1000 DEFENSE PENTAGON
WASHINGTON, DC 20301-1000

MEMORANDUM FOR THE ADJUTANT GENERAL, TEXAS NATIONAL GUARD
THROUGH: THE GOVERNOR OF TEXAS

SUBJECT: Calling Members of the Texas National Guard into Federal Service

On June 7, 2025, the President of the United States called forth at least 2,000 National Guard personnel into Federal service pursuant to section 12406 of title 10, U.S. Code, to protect U.S. Immigration and Customs Enforcement and other U.S. Government personnel who are performing Federal functions, including the enforcement of Federal law, and to protect Federal property, at locations where violent demonstrations against these functions are occurring or are likely to occur based on current threat assessments and planned operations. On October 4, 2025, the President determined that violent incidents, as well as the credible threat of continued violence, are impeding the execution of the laws of the United States in Illinois, Oregon, and other locations throughout the United States.

The President has authorized me to coordinate with you on the mobilization of up to 400 members of the Texas National Guard under section 12406 of title 10, U.S. Code. The orders will be effective immediately for an initial period of 60 days, and be subject to extension, to perform federal protection missions where needed, including in the cities of Portland and Chicago. The Chief of the National Guard Bureau will immediately coordinate the details of the mobilization with you, in coordination with the Chairman of the Joint Chiefs of Staff and Commander, U.S. Northern Command. The mobilized Service members will be under the command and control of the Commander, U.S. Northern Command.

A large, handwritten signature in black ink, appearing to be "P. B. M.", is located on the right side of the page.

cc:
Chairman of the Joint Chiefs of Staff
Chief, National Guard Bureau
Commander, U.S. Northern Command
Under Secretary of Defense for Policy
Under Secretary of Defense for Personnel and Readiness