

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
10/23/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

MICHAEL RABBITT,
KATHERINE MARIE ABUGHAZALEH,
ANDRE MARTIN,
CATHERINE SHARP,
BRIAN STRAW, and
JOSELYN WALSH

1:25-cr-00693
Judge April M. Perry
Magistrate Judge Heather K. McShain
RANDOM / Cat. 3

Case No. Violations: Title 18, United States
Code, Sections 111(a)(1), 372 and 2

UNDER SEAL

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

1. At times material to this indictment:

a. Agent A was a United States law enforcement officer assigned to an administrative role with the Department of Homeland Security, Immigration and Custom Enforcement (“ICE”). On or about September 23, 2025, Agent A was detailed to serve an assignment for ICE in the Northern District of Illinois.

b. The Broadview Service Staging Area (“BSSA”) was an ICE facility located in Broadview, Illinois, which was used to process individuals apprehended for being unlawfully present in the United States.

c. Defendant MICHAEL RABBITT was an individual residing in the Northern District of Illinois.

d. Defendant KATHERINE MARIE ABUGHEZALEH was an individual residing in the Northern District of Illinois.

e. Defendant ANDRE MARTIN was an individual found in the Northern District of Illinois and worked for or with ABUGHEZALEH.

f. Defendant CATHERINE SHARP was an individual residing in the Northern District of Illinois.

g. Defendant BRIAN STRAW was an individual residing in the Northern District of Illinois.

h. JOSELYN WALSH was an individual residing in the Northern District of Illinois.

2. On or about September 26, 2025, at approximately 7:45 a.m., Agent A was wearing civilian clothes driving a government-owned vehicle (the “Government Vehicle”) to the BSSA to report for his official duties. Agent A’s official duties at the BSSA included supervising logistics such as intake, processing, bedspace and transportation coordination for those temporarily detained in Broadview, communicating with upper management and federal partners to manage operations and ensure necessary supplies and proper staffing levels, and responding to requests for information, both internally and from the public.

3. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

MICHAEL RABBITT,
KATHERINE MARIE ABUGHAZALEH,
ANDRE MARTIN,
CATHERINE SHARP,
BRIAN STRAW, and
JOSELYN WALSH,

defendants herein, conspired with one another and others, known and unknown, to prevent by force, intimidation, and threat, Agent A, a United States law enforcement officer, from discharging the duties of his office, and to injure him in his person or property on account of his lawful discharge of the duties of his office, and while engaged in the lawful discharge thereof, and to injure his property so as to interrupt, hinder, and impede him in the discharge of his official duties.

4. It was part of the conspiracy that, as Agent A drove the Government Vehicle and reached the vicinity of the BSSA on or about September 26, 2025, and turned west onto Harvard Street in Broadview, a group of individuals, including RABBITT, ABUGHAZALEH, MARTIN, SHARP, STRAW and WALSH, surrounded the Government Vehicle, with the intent to hinder and impede Agent A from proceeding to the BSSA and discharging the duties of his office.

5. It was further part of the conspiracy that, while surrounding the Government Vehicle, RABBITT, ABUGHAZALEH, MARTIN, SHARP, STRAW, WALSH, and others, among other things, banged aggressively on the Government Vehicle's side and back windows, hood, and other vehicle body parts; crowded together in the front and side of the Government Vehicle and pushed against the

vehicle to hinder and impede its movement; scratched the body of the Government Vehicle, including etching a message into the body of the vehicle, specifically the word "PIG;" broke one of the Government Vehicle's side mirrors; and broke a rear windshield wiper off the Government Vehicle.

6. It was further part of the conspiracy that the co-conspirators, including RABBITT, ABUGHAZALEH, MARTIN, SHARP, STRAW and WALSH, physically hindered and impeded Agent A and the Government Vehicle such that Agent A was forced to drive at an extremely slow rate of speed to avoid injuring any of the conspirators and in doing so slowly progressed towards the BSSA to discharge the duties of his office.

7. It was further part of the conspiracy that RABBITT surrounded the Government Vehicle with the group from the side of the Government Vehicle, bracing his hands and body against the vehicle and hitting the windows of the vehicle, hindering and impeding Agent A and the vehicle from proceeding to the BSSA.

8. It was further part of the conspiracy that ABUGHEZALEH joined the crowd at the front of the Government Vehicle, and with her hands on the hood braced her body and hands against the vehicle while remaining directly in the path of the vehicle, hindering and impeding Agent A and the vehicle from proceeding to the BSSA.

9. It was further part of the conspiracy that MARTIN joined the crowd at the front of the driver's side of the Government Vehicle, and pressed his shoulder

against the vehicle while remaining in the path of the vehicle, hindering and impeding Agent A and the vehicle from proceeding to the BSSA.

10. It was further part of the conspiracy that SHARP joined the crowd at the front of the Government Vehicle, and with her hands on the hood braced her body and hands against the vehicle while remaining directly in the path of the vehicle, hindering and impeding Agent A and the vehicle from proceeding to the BSSA.

11. It was further part of the conspiracy that STRAW joined the crowd at the front of the Government Vehicle, and with his hands on the hood braced his body and hands against the vehicle while remaining directly in the path of the vehicle, hindering and impeding Agent A and the vehicle from proceeding to the BSSA.

12. It was further part of the conspiracy that WALSH joined the crowd near the driver's side window of the Government Vehicle, and wrapped her arms around the driver's side mirror as she pushed against the vehicle, hindering and impeding Agent A and the vehicle from proceeding to the BSSA.

All in violation of Title 18, United States Code, Section 372.

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One of the indictment are incorporated here.

2. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

MICHAEL RABBITT,

defendant herein, forcibly impeded, intimidated, and interfered with an officer of the United States, namely, Agent A, while engaged in or on account of the performance of his official duties;

In violation of Title 18, United States Code, Sections 111(a)(1) and 2.

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One of the indictment are incorporated here.

2. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

KATHERINE MARIE ABUGHAZALEH,

defendant herein, forcibly impeded, intimidated, and interfered with an officer of the United States, namely, Agent A, while engaged in or on account of the performance of his official duties;

In violation of Title 18, United States Code, Sections 111(a)(1) and 2.

COUNT FOUR

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One of the indictment are incorporated here.

2. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

ANDRE MARTIN,

defendant herein, forcibly impeded, intimidated, and interfered with an officer of the United States, namely, Agent A, while engaged in or on account of the performance of his official duties;

In violation of Title 18, United States Code, Sections 111(a)(1) and 2.

COUNT FIVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One of the indictment are incorporated here.

2. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

CATHERINE SHARP,

defendant herein, forcibly impeded, intimidated, and interfered with an officer of the United States, namely, Agent A, while engaged in or on account of the performance of his official duties;

In violation of Title 18, United States Code, Sections 111(a)(1) and 2.

COUNT SIX

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One of the indictment are incorporated here.

2. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

BRIAN STRAW,

defendant herein, forcibly impeded, intimidated, and interfered with an officer of the United States, namely, Agent A, while engaged in or on account of the performance of his official duties;

In violation of Title 18, United States Code, Sections 111(a)(1) and 2.

COUNT SEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. The allegations in Paragraph 1 of Count One of the indictment are incorporated here.

2. On or about September 26, 2025, at Broadview, in the Northern District of Illinois, Eastern Division,

JOSELYN WALSH,

defendant herein, forcibly impeded, intimidated, and interfered with an officer of the United States, namely, Agent A, while engaged in or on account of the performance of his official duties;

In violation of Title 18, United States Code, Sections 111(a)(1) and 2.

A TRUE BILL:

FOREPERSON