

**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 Violations of the Court's Temporary Restraining Order

Plaintiffs, by and through their attorneys, respectfully request that the Court take notice of the below violations of the Court's Temporary Restraining Order. Dkt. 66; October 16, 2020, Hearing T. 4.

VIOLATIONS OF THE TEMPORARY RESTRAINING ORDER

I. Excessive Force and First Amendment Retaliation in Little Village

Residents gathered to observe Gregory Bovino and several CBP agents in a parking lot in the Little Village neighborhood on Wednesday, October 22. Several agents failed to wear prominently displayed, visible identification during the interaction. Then, a masked officer wearing no unique identifier told the residents, without explanation to "clear the area," although they were not obstructing any person or vehicle. Suddenly, four or five officers, including Bovino, confronted a woman who was standing and recording. As officers start to surround her, Bovino asked, "What'd you say? Did you make a threat?" After she denied making a threat, Bovino instructed the officers to take her phone. They approached and grabbed at her shoulders

and chest and tried to grab the phone from her hands as Bovino looked on. The agents pulled the unarmed woman to the ground and put a knee on her back to hold her on the ground.

https://www.facebook.com/watch/?v=834647139017054&surface_type=vod&referral_source=vod_newsfeed_unit.





During this violent interaction, the agents also were not wearing identification.





Alderman Byron Sigcho-Lopez avers that he observed federal agents near 26th Ave. and Ogden on October 22, 2025. Ex. 81, at ¶ 4. Nonviolent protesters were also present. *Id.* The agents did not have any prominently displayed identification. *Id.* at ¶ 5. Alderman Sigcho-Lopez told Defendant Bovino that this was a violation of the TRO and Bovino ignored him. *Id.* at ¶ 7.

Alderman Sigcho-Lopez also observed an agent use some sort of chemical spray on two individuals. *Id.* at 9. The agent was sitting inside his car and deployed the spray while sitting in the passenger seat towards men outside the window. *Id.* Sigcho-Lopez did not see any imminent threat which would justify the use of force. *Id.*

Defendants' agents violated several provisions of the Court's Temporary Restraining Order during these interactions:

1(d) – agents used pepper spray or tear gas on protesters who did not pose an immediate safety threat;

1(e) – agents used pepper spray or tear gas when it was reasonably foreseeable doing so would injure protesters, and doing so was not necessary to stop an immediate and serious threat of physical harm to a person;

1(h) – agents used force, including shoving a person to the ground, tackling, or body slamming an individual who posed no immediate threat of physical harm to others, and the force was not necessary or proportionate to effectuate an apprehension and arrest;

1(j) – agents seized or arrested a non-violent protester who was not resisting a lawful crowd dispersal order in the absence of probable cause; and

2 – agents failed to wear visible identification prominently displayed.

II. Good Faith Attempts to Meet and Confer

Pursuant to the Court’s order that Plaintiffs should confer at least 24 hours before filing a request for relief, Plaintiffs emailed Defendants about this incident on October 22, 2025 and conferred by phone with counsel for Defendants on October 23, 2025.

Respectfully submitted,

/s/ Theresa Kleinhaus

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