

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

CHICAGO HEADLINE CLUB, et al.,

Plaintiffs,

v.

KRISTI NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity, et
al.

Defendants

**No. 25-cv-12173
Hon. Sara L. Ellis**

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 violations of the Court's Temporary Restraining Order (Dkt 66) that took place in the Lakeview neighborhood of Chicago, stating:

VIOLATIONS OF THE TEMPORARY RESTRAINING ORDER

1. On Friday, October 24, 2025, DHS agents (1) used tear gas in a residential neighborhood multiple times and without warning, (2) subjecting many people to significant risk and harm, and (3) did so while failing to wear identifiable alphanumeric numbers or badges, in violation of this court's TRO. These events are described in the declaration of Dallas Knapp, Exhibit 89, social media,¹ video footage, attached as Exhibits 90, 91, 92, 93, the declaration of Tara Goodarzi, Exhibit 94, photograph, Exhibit 95, and further video footage, Exhibit 96.²

¹ See <https://x.com/thejfreakinc/status/1981800378971664489?s=46>

² Exhibits 90, 92, 93, 95, 96 are available online at <https://spaces.hightail.com/space/Xjig9u14vw>

2. As Plaintiffs understand the situation, federal agents apparently made an arrest of a person in the front yard of a residence in Lakeview, which was met with prompt protest.
3. The submitted sources show that, on Friday October 24, 2025, residents gathered to protest and observe several DHS agents near Lakewood and Henderson in the Lakeview neighborhood. Federal agents drove two SUVs, one driving the correct direction on a one-way street and the other driving backwards down the one-way street. Agents were present inside the vehicles, while others stood on the exterior of the cars, and still others were positioned on the ground. *See generally supra* n.1, Exhibits 90, 91, & 92.
4. Most of the protestors were slowly walking in pace with the SUVs as they moved through the neighborhood. *See, e.g.*, Exhibit 90. The protestors were non-violent and, though strongly opposed to the presence of the agents, were filming, blowing whistles, and expressing their desire that the agents leave their neighborhood. *Id.*; *see also* Exhibit 93 at 0:00-38.
5. Without any verbal warning, and without any threat to the officers, an agent in the SUV going backwards threw a tear gas canister out of the window of the car directly at a group of people. *See* Exhibit 93 at 0:39-41. Almost immediately after, what appears to be the same agent threw a second tear gas canister out of the vehicle window at the same group of residents in the street. *Id.* at 0:41-1:00. As before, no warning was given before the second canister was deployed. *Id.*





6. Several canisters were left at the scene. Exhibit 93; Exhibit 95.
7. Video indicates that at the time agents used tear gas, no protester or observer was obstructing the SUV's path, and the DHS agents were not under any threat justifying the use of tear gas. Exhibit 92 at 0:42-1:08.

8. The tear gas employed by Defendants billowed into the homes of residents in the neighborhood, regardless of whether they participated in the protest or not. *See, e.g.*, Ex. 95, Ex. 94 (Goodarzi Decl.) at ¶¶13-15; Ex. 96.
9. Overwhelmingly, the footage also shows that Agents failed to wear prominently displayed, visible identification during the incident. For example:





10. Dallas Knapp adds that he was present at the incident, where he observed people protesting; that agents deployed tear gas without any warning; and that, after being confronted about these tactics, a federal agent indicated they were “just doing [their] jobs.” Ex. 89 (Knapp Decl.) at ¶10. Knapp was himself tear-gassed, and desires to

continue recording agents, but is now afraid to continue filming these incidents. *Id.* at ¶ 12, 14

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

- 1(d) – agents used tear gas on protesters who did not pose an immediate safety threat;
- 1(e) – agents used 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(i) – agents used CS gas without giving two separate and audible warnings; and
- 2 – agents failed to wear visible identification prominently displayed.

II. Good Faith Attempts to Meet and Confer

Pursuant to the Court's order requiring conferral, Plaintiffs emailed Defendants about this incident on October 24, 2025 and conferred by phone with counsel for Defendants on October 26, 2025.

Respectfully submitted,

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