



State of Illinois
Illinois Department of Human Rights



ILLINOIS
ACCOUNTABILITY
COMMISSION

BRIGHTON PARK
INVESTIGATION BRIEF
April 2026



INVESTIGATION BRIEF

BRIGHTON PARK SHOOTING AND CHEMICAL WEAPON VIOLENCE

Date: October 4, 2025

Location: Brighton Park, Chicago, IL

Estimated Number of Agents Involved: Multiple CBP/BORTAC units

Categorization: Roving Patrol, Shooting of Unarmed Civilian, Indiscriminate Chemical Weapons Deployment, Evidence Tampering, Surveillance of Protected Speech, Militarized Occupation of Residential Neighborhood, Materially Inaccurate Official Reports

SUMMARY OF EVENTS

On the morning of October 4, 2025, Marimar Martinez was driving through the Brighton Park neighborhood on the southwest side of Chicago. She was on her way to donate clothes to her church when she spotted an SUV with an Uber placard in the windshield, no front license plate, an out-of-state rear plate, and a uniformed CBP agent visible inside.ⁱ As a community member who had previously alerted neighbors to ICE presence, she suspected federal agents were conducting roving patrols and decided to follow the vehicle.

Martinez had been honking and shouting, “La Migra!”, for about 15 to 20 minutes when events dramatically escalated.ⁱⁱ Body worn camera footage of Agents Adam J. Perkins and Lorenzo Cordero, both seated in the rear, captured what happened inside the federal vehicle.ⁱⁱⁱ At approximately 10:28 a.m., the voice of a federal agents is heard on BWC saying, “Do something, b****.” About 20 seconds later, another voice can be heard: “All right, it’s time to get aggressive and get the f*** out ... they’re trying to box us in.” A voice then foreshadows, “We’re gonna make contact and we’re boxed in.”^{iv}

All three agents claimed that Martinez was the cause of the crash. Agent Charles Exum, the driver of the vehicle, maintained in a statement to the FBI that Martinez came within “inches” of his bumper and that he felt hemmed in by Martinez and another nearby black SUV.^v Agent Exum maintained that “multiple vehicles” were constraining him and in an unrelated filing challenging the deployment of the National Guard to Illinois, the U.S. Solicitor General described the scene to the U.S. Supreme Court as a “carefully orchestrated ambush” involving 10 civilian vehicles.^{vi}

Surveillance video from the 4000 block of South Kedzie moments before the crash does not show a convoy of 10 civilian videos. It does, however, depict, at 10:28 AM, Agent Exum’s SUV (yellow arrow in image below) and Martinez’s Nissan (blue arrow) driving next to each other, with one or two car lengths of space in front of Agent Exum.

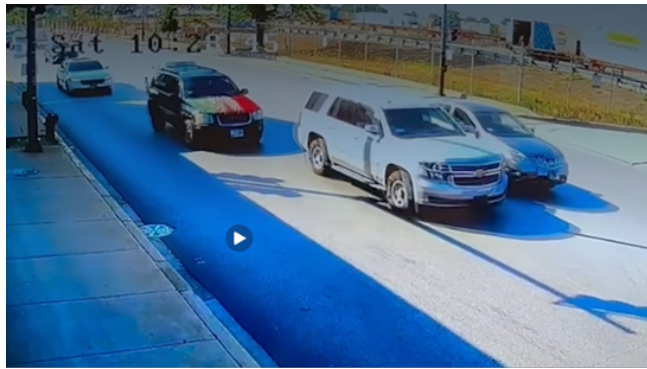


Image 1 Flat Tires Surveillance Video/Chicago Sun-Times^{vii}



Image 2 Flat Tires Surveillance Video/Chicago Sun-Times^{viii}

Martinez described freezing and slamming her brakes after being hit.^{ix} Seeing Agent Exum raise his gun, and aware that federal agents had killed Silverio Villegas González three weeks earlier, she then accelerated and moved to the far-left lane.^x After the collision, one agent can be heard saying “Alright its on now f*****.”^{xi} One agent says “All right, out of the car” and another says “Be advised, we’ve been struck.”^{xii} As soon as he exits the vehicle, Agent Exum is heard on BWC yelling, “Get Down,”^{xiii} before firing five shots at Martinez’s vehicle. Martinez was struck in the arm, chest, and three times in the legs.^{xiv}

No video of the actual crash or shooting has been publicly identified. Agent Exum’s body camera was not activated during the shooting.^{xv} However, an IAC witness driving behind Martinez and the agents provides clarity about this critical moment. This witness told Commission staff that the CBP agent crashed his SUV into Martinez’s car, with no apparent threat to agents’ safety preceding the crash.^{xvi} That Agent Exum caused the crash is corroborated by BWC that shows him turning the steering wheel to the left immediately before the crash, as reflected in the image below.



Image 3 CBP Body Worn Camera^{xvii}

After watching Agent Exum exit the SUV, this witness observed Agent Exum shoot into Martinez's car. Contrary to Agent Exum's account to the FBI that he shot in self-defense because Martinez drove in his direction, this witness did not see Martinez drive her car in the agent's direction, anyone exit Martinez's car, or any other safety threat posed to the agents preceding the shooting. In text messages to a fellow agent, Agent Exum claimed to shoot through Martinez's front windshield.^{xviii}

DHS policy prohibits firing into a moving vehicle unless necessary to defend oneself or others since a neutralized driver would create an uncontrolled safety risk.^{xix}

Photos of Martinez's car reveal three shots through the passenger side of the windshield, another that shattered the rear passenger window, and a fifth shot that traveled from the back to the front of the car. This evidence would suggest that Martinez was driving away and not toward Agent Exum.^{xx}

Moreover, surveillance evidence obtained by Martinez's attorney appears to contradict various aspects of Agent Exum's account,^{xxi} including that there was a caravan of cars following; that he had no ability to drive forward and was "boxed in"^{xxii}; and that Martinez was driving toward him when he fired five shots at her car.^{xxiii} On this critical point, the video from the time of the shooting shows Martinez driving in the left lane as it passed Agent Exum's SUV that is parked in the middle lane.

After the shooting, bodycam footage shows agents jumping out of the vehicle with guns drawn.^{xxiv} Agents pointed their weapons at the drivers of two of the cars behind them, one of whom had rear-ended the agents' vehicle. Both were ordered to exit their vehicles.

Martinez drove approximately one mile to a mechanic shop and called 911 before losing consciousness.^{xxv} While she was in the hospital, a Border Patrol agent photographed her with a cell phone despite insistence to stop. After less than three hours—while still bleeding through bandages—she was discharged from the hospital into FBI custody and taken to an FBI office. Blood dripped on the floor of the FBI office. Martinez heard agents say that the jail initially refused to accept her due to her condition.^{xxvi} She was eventually taken to another hospital for treatment before being released back into federal custody the next day.

The person who had rear-ended the agents' vehicle was questioned by CPD officers on the scene of the accident and told he could leave. Minutes later, a group of federal immigration agents grabbed him without explanation and placed him in handcuffs. His mother arrived screaming and crying as agents kept him in a car with windows up and no air conditioning despite the heat.^{xxvii}

Text messages reveal Agent Exum's reaction to the shooting. He texted fellow CBP agents:

- "s*** happens"^{xxviii}
- "I have a MOF amendment to add to my story. I fired 5 rounds and she had 7 holes. Put that in your book boys." In explaining the text, Exum said 'MOF' meant 'miserable old f***er,' and refers to someone trying to one-up others.^{xxix} A colleague responded: "good shootin, lol." Exum replied: "gracias senor."^{xxx}
- "I'm up for another round of 'f*** around find out'"^{xxxi}
- "Sweet. My fifteen mins of fame. Lmao."^{xxxii}

Bodycam footage also recorded Agent Exum confirming that no shots had been fired by anyone but the CBP agents: "We did not get shot at. We did the shooting."^{xxxiii}

Meanwhile, CBP Commander Gregory Bovino sent Agent Exum a congratulatory email while Martinez remained hospitalized, offering to extend his retirement beyond age 57 due to his "excellent service in Chicago."^{xxxiv} A text message from Exum to another agent boasted that leadership was supportive: "Big time. Everyone has been including Chief Bovino, Chief Banks, Sec Noem and El Jefe himself ... according to Bovino."



CHEMICAL WEAPONS DEPLOYMENT

As news of the shooting spread, community members gathered near 39th and Kedzie, the intersection where Martinez was shot. Federal agents also arrived in force, including BORTAC tactical units from El Paso.^{xxxv} An armored vehicle drove down Kedzie Avenue with an agent on top pointing a weapon down at civilians, including children sitting on the sidewalk with their parents.^{xxxvi}



A nine-newsroom collaborative investigation documented at least 15 separate deployments of tear gas and pepper spray in Brighton Park on October 4 alone—more than CPD used in all of 2025.^{xxxvii} In reviewing one incident from that day at the Commission's Dec. 18, 2025, hearing, Dr. Rohini Haar concluded that agents had shot a projectile at the feet of individuals who were neither advancing nor approaching the agents: “..there’s no imminent threat to public safety and there’s no one being violent here except the [federal immigration] officers.”^{xxxviii}

Two witnesses who experienced repeated tear gas deployments shared their accounts with

the Commission. At no point did either of them hear warnings from federal agents before tear gas was deployed. Nor did they personally observe any justification for the agents to use the chemical weapons. One witness described a repeating cycle: deployment, panic and dispersal, air clears, crowd returns, then another deployment. The second witness described that “it kind of felt like they were like, well, we did it, let’s just keep doing it.”^{xxxix}

One of the deployments occurred as five or six federal vehicles sped away from the scene. As they drove through the crowd, agents lowered their windows and continued to throw tear gas canisters at people while speeding by, nearly hitting a person on a bicycle.^{xl} A woman fell to the ground crying and begging for help, saying she was going to die. An elderly man was caught in a deployment, could not breathe, and slowly slid down a building wall. Community volunteers administered eye wash to at least 10 people; others were choking, unable to vomit, and described a burning sensation.^{xli}

At around 3:00 PM, agents “were informed over service radio to use all means necessary to ensure their safe exit, to include the use of deadly force.”^{xlii}



Image 6 Submitted to Commission by Paul Goyette

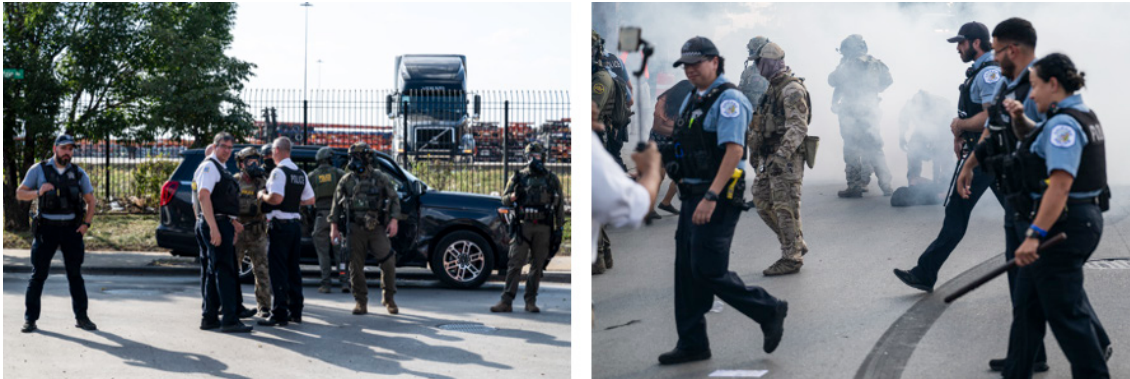


Image 7 South Side Weekly^{xliii}



Image 8 Submitted to Commission by Paul Goyette

Twenty-seven CPD officers were injured by the deployment of chemical weapons.^{xliv} Most lacked proper protective gear. Community volunteers passed out masks to CPD officers. One young CPD officer, after receiving eye wash from a witness who spoke to the Commission told them: “Thank you so much. I just want to let you know, please be very careful. We have no idea what they’re capable of, and we have to be here.”^{xlv}



Images 9 and 10 Submitted to Commission by Paul Goyette

Federal agents used the parking lot of Davis Elementary School—one block from the confrontation—to stage and regroup. The school principal called Chicago Public School District to have them removed. Brighton Park schools have since closed their parking lots.^{xlvi} Kedzie Avenue was blocked for approximately six to seven hours across a two-to-three-block radius. Two IAC witnesses independently characterized the scene as a “war zone.”^{xlvii}

Evidence of Tampering and Materially Inaccurate Reports

According to court filings and Martinez’s congressional testimony, within days of the shooting the Border Patrol vehicle driven by Agent Exum was driven approximately 1,100 miles from the FBI evidence garage in Chicago to Maine, where Agent Exum is based. Martinez testified that a Border Patrol mechanic in Maine was told to “buff out” the damage before defense attorneys could examine it.^{xlviii} Upon discovery, a federal judge ordered the vehicle’s immediate return to Chicago.^{xlix}

The initial government account stated that Border Patrol agents had been “ambushed by domestic terrorists that rammed federal agents with their vehicles.”^l As explained, this is contradicted by the available evidence, including surveillance video in the minute before the shooting, BWC footage showing Agent Exum steer into Martinez’s car, and eyewitness accounts.

DHS also claimed that Martinez was armed with a semi-automatic weapon. Martinez was the registered owner of a firearm that was in her vehicle. There is no evidence indicating that she

ever brandished the weapon at any point during the incident.

In her November 2025 opinion, U.S. District Judge Sara L. Ellis found that agents' written reports "systematically contradicted their own body camera footage" and constituted "widespread misrepresentations."^{li} For example, in an official incident report, Agent Hugo Sanchez reported that he deployed several rounds of PepperBall Pava projectiles as the agents' vehicles were attempting to leave the scene as crowds "continued to assault the officers/agents and attempt to throw and kick back the chemical munitions canisters" and after seeing "a female dressed in black clothing throwing objects such as eggs and glass bottles at the convoy."^{lii} Judge Ellis found, however, the Agent Sanchez's body worn camera footage does not show any violent protesters or protesters blocking agents vehicles.^{liii}

LEGAL PROCEEDINGS AND PUBLIC ACCOUNTABILITY

On October 5, the Department of Justice charged Martinez with assaulting federal officers.^{liv} That evening, she was called a "domestic terrorist" who "ambushed" agents on the news, including by FBI Director Kash Patel, who circulated a video purporting to show Martinez ramming the agents' vehicle.^{lv} The government sought pretrial detention; over 50 letters from parents at the Montessori school where Martinez worked were submitted in her support. The judge denied detention. Federal prosecutors ultimately dropped the charges, and on November 20, 2025, Judge Alexakis dismissed all charges with prejudice.^{lvi}

On February 3, 2026, Martinez testified at a Senate forum organized by Sen. Richard Blumenthal, telling lawmakers: "My own government attempted to execute me."^{lvii} Three days later, a federal judge ordered the release of bodycam footage over government objection, stating the material would "counter the government's public narrative."^{lviii} On February 11, Martinez's attorney Christopher Parente held a press conference announcing that Martinez had filed a Federal Tort Claims Act complaint.^{lix} In a rare acknowledgment of wrongdoing by DHS, the three agents inside of the vehicle have been placed on administrative leave.^{lx}

Surveillance of Marimar Martinez

According to an official report, CBP's Open Source Intelligence Team (OSIT) had tagged Martinez as a threat based on a reshared social media post.^{lxi} According to the OSIT report, Martinez had reshared a post that claimed to identify an ICE agent with the comment "they found him lol."^{lxii} Although it is unknown if Agent Exum or other agents in the vehicle were

aware of Martinez's identity during their encounter, CBP had disseminated her photo and information to Operation Midway Blitz agents five days before she was shot.^{lxiii}

Commission Determinations of Misconduct

Based on the information it has gathered, the Commission has determined that there is reasonable cause to believe that federal agents should be formally investigated for possible violations of agency policy, state and federal criminal laws, and individuals' constitutional rights. In particular, the following instances of misconduct should be investigated further:

- Agent Charles Exum shot an unarmed civilian without apparent justification. Available video evidence, witness testimony, Martinez's congressional statement, visual analysis of available video, eyewitness accounts, and other evidence indicate that Exum steered into Martinez's vehicle and then fired at her as she was either stationary or driving away. While Martinez was following the agents, this alone cannot justify a shooting.^{lxiv} And while Martinez had a firearm, she never took it out of her purse. Evidence was deliberately tampered with and destroyed. According to court filings and congressional testimony, the Border Patrol vehicle was driven 1,100 miles to Maine, where a mechanic was ordered to "buff out" damage. Exum's body camera was not activated during the shooting.
- Federal agents produced materially inaccurate official reports. The E-STAR Incident Report of the use of tear gas listed zero injuries and zero witnesses despite hundreds present and 27 CPD officers injured. At least one agent used ChatGPT to draft a use-of-force report. This is consistent with what Judge Ellis in her opinion described, generally across Operation Midway Blitz, as "widespread misrepresentations" that "systematically contradicted" bodycam footage.
- Chemical agents were deployed indiscriminately against a residential neighborhood without warning. News reports have documented at least 15 deployments on October 4 alone. No warnings were given and many, if not most, of the deployments appear to have occurred absent provocation. As a result, an elderly man collapsed, a woman fell to the ground in distress, and children were present throughout. Hours after the shooting, at 3:03 PM, agents were informed over service radio to "use all means necessary to ensure their safe exit, to include the use of deadly force."^{lxv} All told, 27 officers were injured from the various deployments.
- CBP's OSINT Team monitored a civilian's social media activity and disseminated

her personal information to field agents five days before the shooting, based on a reshared Facebook post. Martinez's photograph and identifying details were provided to Operation Midway Blitz agents.^{lxvi} While it is unclear what if any role this played in her shooting on October 4, 2025, the scope and nature of this monitoring—targeting activity that may constitute protected First Amendment expression—raises significant policy and constitutional concerns.

- DHS leadership, from the operational commander to the Secretary, failed to ensure accountability. Bovino sought to reward Agent Exum's use of force before any investigation had concluded. Secretary Noem claimed ignorance of the case before the Senate Judiciary Committee. The institutional response at every level was to defend and conceal rather than investigate and correct.
- The scale and nature of federal operations in Brighton Park raised concerns about the impact on civic life. IAC witness testimony indicates that some community members—including U.S. citizens—expressed concern about the presence of federal agents near public spaces. The deployment of an armored vehicle, the use of an elementary school parking lot for staging, and a six-hour blockade of a residential neighborhood far exceeded what would be expected of a routine law enforcement operation. Three witnesses expressed concern to the Commission that future paramilitary surges into their communities in and around the time of elections may suppress the vote.

Endnotes

- i Statement of Marimar Martinez, United States' Senate Forum on Immigration Agents' Use of Force, at 1 (Feb. 3, 2026), https://www.blumenthal.senate.gov/imo/media/doc/2026-2-3_marimar_martinez_statement.pdf#:~:text=is%20Marimar%20Martinez.-,%20am%20here%20not%20only%20as%20a%20survivor%20of%20this,for%20meaningful%20change%20and%20accountability.
- ii Ruby Cramer, *Shot by Border Patrol, Then Called a 'Domestic Terrorist'*, The New Yorker (March 12, 2026), https://www.newyorker.com/news/annals-of-immigration/shot-by-border-patrol-then-called-a-domestic-terrorist?_sp=5c5ac04c-2925-4d20-ad3d-d785be8f8129.1776024297367.
- iii CBP Body Worn Camera, Axon 2025-10-04_1128_D01E06894; see Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- iv Chris Looft *et. al.*, *Video Suggests DHS Exaggerated Claims About The Shooting Of Marimar Martinez: Visual Analysis*, ABC News (Feb. 12, 2026), <https://abcnews.com/US/video-suggests-dhs-exaggerated-claims-shooting-marimar-martinez/story?id=130077502>.
- v Ruby Cramer, *Shot by Border Patrol, Then Called a 'Domestic Terrorist'*, The New Yorker (March 12, 2026), https://www.newyorker.com/news/annals-of-immigration/shot-by-border-patrol-then-called-a-domestic-terrorist?_sp=5c5ac04c-2925-4d20-ad3d-d785be8f8129.1776024297367.
- vi Application for Stay at 9, *Trump v. Illinois*, No. 25-2798 (U.S. Oct. 17, 2025), https://www.supremecourt.gov/DocketPDF/25/25A443/379964/20251017155210488_Trump%20v.%20Illinois%20No.%2025A__%20-%20Stay%20Application%20-%20Final.pdf.
- vii Chicago Sun-Times, *Footage Allegedly Shows Vehicles Involved in Brighton Park Border Patrol Shooting* (YouTube, Oct. 6, 2025), <https://youtu.be/b4qBLgk9hWw>.
- viii Chicago Sun-Times, *Footage Allegedly Shows Vehicles Involved in Brighton Park Border Patrol Shooting* (YouTube, Oct. 6, 2025), <https://youtu.be/b4qBLgk9hWw>.
- ix Martinez Statement, *supra* note 1, at 2.
- x Martinez Statement, *supra* note 1, at 2.
- xi CBP Body Worn Camera, Axon 2025-10-04_1128_D01E06894; see Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xii CBP Body Worn Camera, Axon 2025-10-04_1128_D01E06894; see Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xiii CBP Body Worn Camera, Axon 2025-10-04_1128_D01E06894; see Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xiv Martinez Statement, *supra* note 1, at 2.
- xv Sabrina Franza & Asal Rezaei, *New Marimar Martinez Shooting Evidence Shows Border Patrol Agent Joked In Aftermath, Was Praised By Bovino*, CBS Chicago (Feb. 11, 2026), <https://www.cbsnews.com/chicago/news/marimar-martinez-shooting-chicago-video-texts-border-patrol/>.
- xvi IAC Anonymous Witness #2 (Feb. 2026).
- xvii Chicago Sun-Times, *Footage Allegedly Shows Vehicles Involved in Brighton Park Border Patrol Shooting* (YouTube, Oct. 6, 2025), <https://youtu.be/b4qBLgk9hWw>.
- xviii Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xix Alejandro N. Mayorkas, Secretary of Homeland Security, *Update to the Department Policy on the Use of Force*, at 3 (Feb. 6, 2023); *see also* testimony of Dr. Marc Brown at Jan. 30, 2026, Commission hearing.
- xx Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xxi 60 Minutes, *U.S. Citizen Shot by Border Patrol: "I Feared For My Life"*, [YouTube], Jan. 29, 2026, https://www.youtube.com/watch?v=qjc-ai_JbjQ.

- xxii U.S. Border Patrol, Intentional/Unintentional Firearm Discharge / Use of Force /Shots Fired / Shooting Report, *Chicago Headline Club v. Noem*, 25-cv-12173, Dkt. 284-36 (Nov. 24, 2025).
- xxiii Firearm Discharge Report drafted by Agent Exum (Martienz “accelerated forward in an attempt to run over agents on foot. To defend himself and fellow agents, an agent drew his service issued Glock 47 and fired a total of five rounds through the windshield, striking the driver of the Nissan Rogue.”)
- xxiv CBP Body Worn Camera, Axon 2025-10-04_1128_D01E06894; see Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xxv Martinez Statement, supra note 1, at 2.
- xxvi Martinez Statement, supra note 1, at 2–3.
- xxvii IAC Anonymous Witness #2 (Feb. 2026).
- xxviii Dalia Faheid and Omar Jimenez, *Text Messages and A Moved SUV: How the Government’s Case Against a Chicago Woman*, CNN (Nov. 21, 2025), <https://www.cnn.com/2025/11/21/us/marimar-martinez-shooting-case-what-we-know>.
- xxix Julianne McShane, *A Border Patrol Agent Bragged About Shooting Someone, Texts Show*, Mother Jones (Nov. 6, 2025), <https://www.motherjones.com/politics/2025/11/a-border-patrol-agent-bragged-about-shooting-someone-texts-show/>.
- xxx Sabrina Franza & Asal Rezaei, *New Marimar Martinez Shooting Evidence Shows Border Patrol Agent Joked In Aftermath, Was Praised By Bovino*, CBS Chicago (Feb. 11, 2026), <https://www.cbsnews.com/chicago/news/marimar-martinez-shooting-chicago-video-texts-border-patrol/>; Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xxxi Julianne McShane, *A Border Patrol Agent Bragged About Shooting Someone, Texts Show*, Mother Jones (Nov. 6, 2025), <https://www.motherjones.com/politics/2025/11/a-border-patrol-agent-bragged-about-shooting-someone-texts-show/>.
- xxxii Julianne McShane, *A Border Patrol Agent Bragged About Shooting Someone, Texts Show*, Mother Jones (Nov. 6, 2025), <https://www.motherjones.com/politics/2025/11/a-border-patrol-agent-bragged-about-shooting-someone-texts-show/>.
- xxxiii Sabrina Franza & Asal Rezaei, *New Marimar Martinez Shooting Evidence Shows Border Patrol Agent Joked In Aftermath, Was Praised By Bovino*, CBS Chicago (Feb. 11, 2026), <https://www.cbsnews.com/chicago/news/marimar-martinez-shooting-chicago-video-texts-border-patrol/>.
- xxxiv Sabrina Franza & Asal Rezaei, *New Marimar Martinez Shooting Evidence Shows Border Patrol Agent Joked In Aftermath, Was Praised By Bovino*, CBS News (Feb. 11, 2026), <https://www.cbsnews.com/chicago/news/marimar-martinez-shooting-chicago-video-texts-border-patrol/>; Melody Mercado, *Evidence Shows Feds Lied to Justify Shooting Marimar Martinez, Lawyer Says*, Block Club Chicago (Feb. 11, 2026), <https://blockclubchicago.org/2026/02/11/evidence-shows-feds-lied-to-justify-shooting-marimar-martinez-lawyer-says/>.
- xxxv Bellingcat, “Agents of Chaos: Unpacking the Actions of Border Patrol Agents Across US,” (Mar. 17, 2026). <https://www.bellingcat.com/news/2026/03/17/border-patrol-agents-of-chaos/>
- xxxvi IAC Anonymous Witness #2 (Feb. 2026).
- xxxvii José Abonce et. al., *Feds Used Chemical Agents Dozens of Times in Chicago—Even After Judge Said to Stop*, South Side Weekly, (Nov. 19, 2025), <https://southsideweekly.com/feds-tear-gas-pepper-spray-midway-blitz-investigation-ice-chicago/>.
- xxxviii Testimony of Dr. Rohini Haar at Dec. 18, 2025, Commission hearing.
- xxxix IAC Anonymous Witnesses #1 and #2.
- xl IAC Anonymous Witness #1.
- xli IAC Anonymous Witnesses #1 and #2.
- xliv *Chicago Headline Club v. Noem*, 25-cv-12173, Dkt. 284-23 (Nov. 24, 2025).
- xlvi José Abonce et. al., *Feds Used Chemical Agents Dozens of Times in Chicago—Even After Judge Said to Stop*, South Side Weekly, (Nov. 19, 2025), <https://southsideweekly.com/feds-tear-gas-pepper-spray-midway-blitz-investigation-ice-chicago/>.
- xlvii Madison Savedra, *27 Police Officers Among Those Injured By Tear Gas During Weekend Protest, Chicago’s Top Cop Says*, Block Club Chicago (Oct. 6, 2025), <https://blockclubchicago.org/2025/10/06/27-police-officers-among-those-injured-by-tear-gas-during-weekend-protest-chicagos-top-cop-says/>.
- xlviii IAC Anonymous Witness #1.

- xlvi IAC Anonymous Witness #1.
- xlvii IAC Anonymous Witnesses #1 and #2.
- xlviii Martinez Statement, *supra* note 1, at 4.
- xlix Jon Seidel, *Federal Agent Took Car from Brighton Park Shooting 'Back to Maine,' Defense Attorney Tells Judge*, Chicago Sun-Times (Oct. 16, 2025), <https://chicago.suntimes.com/immigration/2025/10/16/federal-agent-took-car-from-brighton-park-shooting-back-to-maine-defense-attorney-tells-judge>.
- I DHS Press Release, "UPDATE: DHS Deploys Special Operations After Multiple Violent Attacks on Federal Law Enforcement by Domestic Terrorists in Chicago," (Oct. 4, 2025), <https://www.dhs.gov/news/2025/10/04/update-dhs-deploys-special-operations-after-multiple-violent-attacks-federal-law>.
- li In her November 2025 opinion, U.S. District Judge Sara L. Ellis found that agents' written reports "systematically contradicted their own body camera footage" and constituted "widespread misrepresentations." ABC7 Chicago, "ICE in Chicago: Federal agents engaged in widespread misrepresentations to justify use of force: Judge," (Nov. 29, 2025) (reporting on Ellis opinion), <https://abc7chicago.com/post/ice-chicago-federal-agents-engaged-widespread-misrepresentations-justify-use-force-judge-ellis-says/18224047/>.
- lii CBP E-STAR Incident Report #25706, *Chicago Headline Club v. Noem*, 25-cv-12173, Doc. 284-23 (N.D. Ill. Nov. 24, 2025), <https://www.courtlistener.com/docket/71559589/284/23/chicago-headline-club-v-noem/>.
- liii Mem. Op. & Order, *Chicago Headline Club v. Noem*, 25-cv-12173, Doc. 281 (N.D. Ill. Nov. 20, 2025).
- liv Kaitlin Washburn, *Woman Shot By Border Patrol Is Charged; Brighton Park Residents Say Feds Antagonized The Community*, WBEZ (Oct. 6, 2025), <https://www.wbez.org/immigration/2025/10/06/border-patrol-shooting-brighton-park-marimar-martinez>.
- lv FBI Director Kash Patel (@FBI DirectorKash), X (Oct. 5, 2025, 7:55 PM), <https://x.com/FBIDirectorKash/status/1975001981828931752>; see also Jeff Arnold, *DHS claims about 'domestic terrorists' don't always line up with evidence in court*, NewsNation (Feb. 6, 2026), <https://www.newsnationnow.com/us-news/immigration/dhs-domestic-terrorists-evidence-in-court/#:~:text=Within%20hours%20of%20the%20criminal%20complaint%20being,purporting%20to%20show%20Martinez%20ramming%20the%20federal>.
- lvi Madison Savedra, *Feds Drop Charges Against Woman Shot By Border Patrol In Brighton Park*, Block Club Chicago (Nov. 20, 2025), <https://blockclubchicago.org/2025/11/20/feds-drop-charges-against-woman-shot-by-border-patrol-in-brighton-park/>.
- lvii Jenna Schweikert and UIIS Public Affairs Reporting (PAR), *'My Own Government Attempted To Execute Me,' Chicago Woman Shot By Border Patrol Testifies*, Capitol News Illinois (Feb. 3, 2026), <https://capitolnewsillinois.com/news/my-own-government-attempted-to-execute-me/>.
- lviii Matt Masterson, *Judge OKs Release of Video, Other Evidence After Chicago Woman Shot Five Times by Border Patrol*, WTTW (Feb. 6, 2026), <https://news.wttw.com/2026/02/06/judge-oks-release-video-other-evidence-after-chicago-woman-shot-five-times-border-patrol>.
- lix Maggie Dougherty, *Marimar Martinez, Chicago Woman Shot And Briefly Charged By Border Patrol, Moves To Sue*, Capitol News Illinois (Feb. 11, 2026), <https://capitolnewsillinois.com/news/marimar-martinez-chicago-woman-shot-and-briefly-charged-by-border-patrol-moves-to-sue/>.
- lx Ruby Cramer, *Shot by Border Patrol, Then Called a 'Domestic Terrorist,'* The New Yorker (March. 12, 2026), https://www.newyorker.com/news/annals-of-immigration/shot-by-border-patrol-then-called-a-domestic-terrorist?_sp=5c5ac04c-2925-4d20-ad3d-d785be8f8129.1776024297367.
- lxi Mark Rivera et. al, *Immigration Authorities Had Surveilled Chicago Woman Shot 5 times During 'Midway Blitz'*: CBP Report, ABC7 Chicago (Feb. 12, 2026), <https://abc7chicago.com/post/immigration-authorities-had-surveilled-marimar-martinez-chicago-woman-shot-5-times-during-operation-midway-blitz-cbp-report/18593132/>.
- lxii Mark Rivera et. al, *Immigration Authorities Had Surveilled Chicago Woman Shot 5 times During 'Midway Blitz'*: CBP Report, ABC7 Chicago (Feb. 12, 2026), <https://abc7chicago.com/post/immigration-authorities-had-surveilled-marimar-martinez-chicago-woman-shot-5-times-during-operation-midway-blitz-cbp-report/18593132/>.
- lxiii Mark Rivera et. al, *Immigration Authorities Had Surveilled Chicago Woman Shot 5 times During 'Midway Blitz'*: CBP Report, ABC7 Chicago (Feb. 12, 2026), <https://abc7chicago.com/post/immigration-authorities-had-surveilled-marimar-martinez-chicago-woman-shot-5-times-during-operation-midway-blitz-cbp-report/18593132/>.

Ixiv Regarding the ramming of vehicles that are following officers to document and protest, Seth Stoughton told the Commission: "There are even situations such as when a vehicle presents an imminent danger of serious bodily harm or death to officers or bystanders where aggressive contact can be appropriate, like ramming the vehicle, but these are all very serious and they're typically reserved for serious situations like preventing the flight of a violent felon or protecting officers or bystanders from imminent attack. I don't see how any of that would be justified against a vehicle that is just following officers. Especially because people and other vehicles are constitutionally allowed to follow officers." *See also*, ACLU, "Recording and Documenting Federal Agents," (March 10, 2026), <https://www.aclu.org/know-your-rights/recording-and-documenting-police-and-federal-agents>.

Ixv Regarding the authorization to use deadly force, Seth Stoughton explained to the Commission: " Those circumstances where it would be appropriate are limited to those situations that we're talking about an imminent threat of death or great bodily harm, and that means it would never be appropriate to give a prior authorization of deadly force in the absence of an imminent threat of death or great bodily harm. So I want to be very clear about this because there should never be a blanket used deadly force to exit a situation or a used deadly force to create an exit directive against a crowd. That's not a tactical decision, that's an escalation order and it's neither professionally appropriate nor legal."

Ixvi Mark Rivera et. al., *Immigration Authorities Had Surveilled Chicago Woman Shot 5 Times During 'Midway Blitz,'* ABC7 Chicago (Feb. 12, 2026), <https://abc7chicago.com/post/immigration-authorities-had-surveilled-marimar-martinez-chicago-woman-shot-5-times-during-operation-midway-blitz-cbp-report/18593132/>.

