



State of Illinois
Illinois Department of Human Rights



ILLINOIS ACCOUNTABILITY COMMISSION

**EVANSTON
HALLOWEEN VIOLENCE
INVESTIGATION BRIEF**
April 2026



INVESTIGATION BRIEF

Evanston Halloween Violence

Date: October 31, 2025

Location: Evanston, Illinois

Estimated Number of Agents Involved: At least 3

Categorization: Roving Patrol, Excessive Force, Unlawful Detention of U.S. Citizens, Firearm Brandishing, Chemical Agents, Reckless Driving, Sensitive Locations, Denial of Medical Care, Failure to Display ID, Materially Inaccurate Official Reports

INTRODUCTION

Governor Pritzker requested DHS suspend enforcement operations during Halloween weekend. Secretary Noem rejected the request.ⁱⁱ On Halloween morning, a group of CBP agents—including Commander Bovino—conducted roving operations across Evanston and Skokie, events that would culminate in a flashpoint of excessive force by federal agents.ⁱⁱ

Oakton and Sherman

Around 9:30 AM, several CBP agents detained three landscapers near Oakton and Sherman.ⁱⁱⁱ One of them, after being handcuffed, was released after insisting he was an American citizen.^{iv} Around 11:00 AM, a community alert went out that federal immigration agents had a “large presence” in Skokie.^v Helicopters could be heard overhead.^{vi}

Lincolnwood Elementary Incident

Around that same time, Evanston resident Kelly Mack was riding her bike near the intersection of Colfax & Bennett where Lincolnwood Elementary School, a kindergarten-fifth grade school, is located.^{vii} Mack saw a neighbor talking to two federal agents in military fatigues and face masks and began recording.^{viii} Mack then saw the agents shove her neighbor multiple times without warning. Three agents stood in the intersection, seeming to direct traffic, including other federal vehicles. Three additional vehicles of federal agents then appeared and went through the intersection. One vehicle stopped, and an agent in military fatigues exited one of the vehicles holding a PepperBall launcher. The agent walks around the vehicle towards the neighbor who had been shoved by agents. A fifth vehicle then arrived at the intersection. Mack stated in a sworn declaration: “I was scared because I knew the agent was holding a weapon just feet away from a kindergarten classroom”^{ix} at Lincolnwood Elementary School. A video of the interaction recorded by Mack, which was submitted as evidence in *Chicago Headline Club v. Noem*, is available here.^x

Shortly thereafter, Evanston-Skokie School District 65 ordered all schools to conduct indoor recess and Evanston Township High School closed its campus.^{xi} The presence of roving federal agents was heavily felt within a four-block radius containing four schools, a community center, and a retirement home.^{xii} Evanston’s community activated.

Following the events of the morning, District 65 school board member Andrew Wymer and others began to follow agents as they patrolled Evanston and Skokie, honking and blowing whistles to warn neighbors.^{xiii} Approximately five cars began following and documenting the activities of the federal agents. Multiple witnesses described the federal agents driving erratically, running red lights and stop signs near schools during school hours.^{xiv}

Agent Donahue Causes Motorist Crash

Around 12:15 PM, CBP Agent Timothy Donahue, on detail to Operation Midway Blitz from the El Centro Sector, was driving a federal SUV vehicle when he slammed on his brakes at the intersection of Oakton Street and Asbury Avenue, causing a civilian driver to rear-end him. A DHS statement claimed that agents “were being aggressively tailgated by a red vehicle” and crashed into their car when the agents attempted to make a U-turn.^{xv} In his incident report describing the vehicle collision, Agent Donahue reported that he had “proceeded left of stopped traffic and continued through the red light at approximately 20 mph” and the driver “followed me through the red light.”^{xvi} He also claimed that he came to a complete stop after he cleared the intersection in order “address the driver for her illegal and unsafe actions” and that she “rammed” him after failing to stop in time.^{xvii}

Witnesses tell a different story. Dan Abu-Absi was across the intersection from the collision stopped at the stop light and heard the roaring of an engine then an SUV come through the intersection at a “high speed,” creating distance with the car behind him, then stop “for no reason.”^{xviii} “It was a classic brake check move, but more extreme than I’ve ever seen,” he recalled. Sarah Hines, who was stopped at the adjacent red light, saw the federal vehicle “fly through the intersection” and heard the “slamming of brakes and then a collision.”^{xix}

Agents Forcefully Detain Motorist and Bystander

After the collision, the scene at Oakton and Asbury quickly grew chaotic. What transpired was swift and violent. Video captures agents immediately walking up to the vehicle and forcibly extracting the driver.^{xx} After some struggle, they placed the motorist in their SUV. To Abu-Absi, “it just seemed like a moment of just pure injustice because they caused the accident in the first place.”^{xxi} Jennifer Moriarty, an Evanston resident and attorney, approached with her phone out to record what was happening to the driver after watching agents “rip[] her out of her car and put her on the ground.”^{xxii} Before she could start the recording, an agent grabbed Moriarty by the neck and threw her to the pavement, knocking a shoe off her foot.^{xxiii} She was handcuffed

by an agent sitting on top of her. When she asked to put her shoe on, the agent picked it up and threw it.^{xxiv} Moriarty was taken into custody and placed with the motorist in the back of the SUV.^{xxv}

It was such an incredibly disturbing demonstration of utter violence. It never felt like there was an operation being conducted. It felt like mayhem and chaos. There was no chain of command. They were yelling at each other. Guns were pulled.” - Sarah Hines^{xxvi}

Agents Severely Beat Good Samaritan

Marcello Africano, a 27-year-old U.S. citizen who had been helping his brother move nearby, ran to the scene to help.^{xxvii} [Video](#) shows Agent Donahue punching Africano in the head, landing him on the pavement.^{xxviii} According to an incident report, Officer Jose Martinez was attempting to restrain Africano when Agent Thomas Parsons came to assist him.^{xxix} Agent Parsons grabbed Africano’s head and punched him twice in the head with a closed fist while his head was against the ground, then pressed his face into the pavement while kneeling on his back.^{xxx} At one point while on the ground, Agent Parsons appears to put Africano in a “guillotine chokehold” by constricting his arm around Africano’s neck. Agent Parsons claimed in his incident report that Africano had assaulted him by grabbing his genitals; this is not observed in any available video reviewed by Commission staff.^{xxxi}

Witnesses described a brutal scene. Hines watched agents striking Africano’s head while he was prone, arms behind his back, as he strained his neck yelling “I can’t breathe, help me.”^{xxxii} Moriarty also heard Africano say this and saw an agent twist Africano’s leg as if attempting a spiral fracture.^{xxxiii} Another witness, Kerry Littel, described Africano as looking “dazed” and “in need of medical attention.”^{xxxiv} Africano repeated throughout the ordeal: “I was just helping my brother move and we saw an accident.”^{xxxv} He ended up in the federal vehicle instead.^{xxxvi}

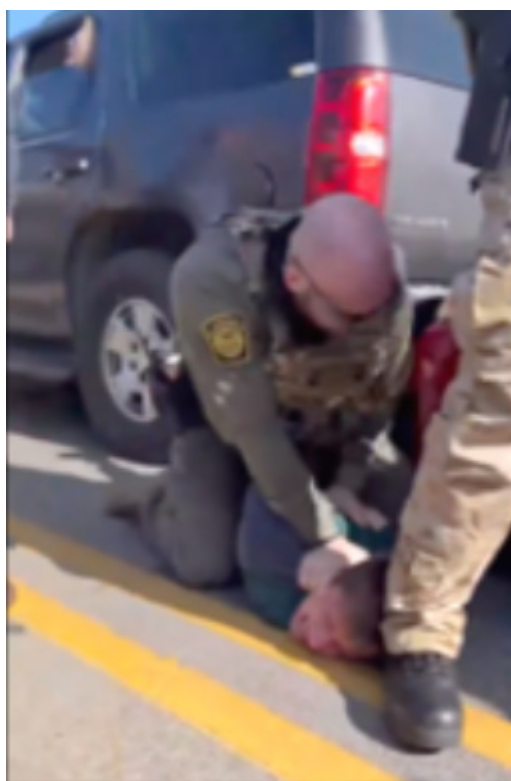


Image 1 Bystander video of Agent Parsons beating Africano^{xxxvii}

Agent Donahue Threatens and Points His Firearm Twice at Protesters

Another Evanston resident, David Brooks, was among the growing crowd watching the violence unfold.^{xxxviii} As he filmed Agent Donahue shove one of the civilians into the car, Agent Donahue yelled: "Step back or I'll f***ing shoot you."^{xxxix} Donahue drew his pistol and aimed it at Brooks and others standing nearby at least twice within 45 seconds. IAC Witness Hines said she was "absolutely sure that someone was gonna get shot."^{xl} Multiple witnesses independently described the agents as operating without any chain of command: "They were all yelling at each other. Nobody seemed to know what was going on."^{xli}



Image 2 Bystander video of gun pointed at Brooks and other bystanders^{xlii}

Agent Maxa Pepper Sprays Protester

As Agent Donahue drove away, Evanston resident Frederick Goodwill was shouting at Agent Donahue's passing SUV and saw Agent Donahue point at him.^{xliii} Another agent, Edward Maxa, immediately turned and shot Goodwill directly in the face with pepper spray from close range, without warning.^{xliiv} Available video shows Goodwill shouting at the passing SUV while leaning toward it, and apparent spittle leave his mouth that appears to fall far short of the departing vehicle.^{xliv} Agent Maxa is then seen spraying Goodwill from close range while Goodwill is stepping away from him. When reviewing this incident at the December 18, 2025, hearing, Dr. Rohini Haar testified that it was a misuse of a chemical irritant: "One, they sprayed without any real threat present. This person is not obstructing anything or causing any harm. But two, he's also spraying this poor gentleman in the face, which... can cause significant eye trauma and is completely unnecessary here."^{xlvi}

Agent Maxa wrote in his report that Goodwill had approached Agent Donahue's vehicle and spat at him.^{xlvii} Once Goodwill had already "moved away from the window," Agent Maxa "immediately" sprayed Goodwill in the face.^{xlviii} No other reason is otherwise given for the spray. Goodwill acknowledged that spit may have left his mouth when he was yelling "no pardons," but denied trying to spit at anyone.^{xlix} On Agent Donahue's BWC, a voice is heard yelling "no pardons!" before Agent Donahue states, "that mother f***er spit on me!"^l Goodwill's vision was impaired for days; a bystander took him into a nearby retirement home to flush his eyes before paramedics arrived.^{li}



Image 3: Source – Bystander video of Goodwill seconds after being sprayedⁱⁱⁱ

The scene finally began to settle down when approximately 10 agents and 20 members of the public were present in the aftermath of the crash.^{liii}

Detention and Denial of Medical Care

All three detainees—the driver, Moriarty, and Africano—were U.S. citizens. After they were arrested, Agent Donahue drove them through Evanston and Rogers Park for over an hour, stopping in an alley behind a Popeyes on Howard Street before eventually reaching the Northshore Sculpture Park on McCormick Street in Skokie.^{liv} Donahue threatened to use pepper spray against all three detainees during the transport, creating an environment of sustained intimidation and threat.^{lv} Moriarty reported that Donahue brake-checked other vehicles on three separate occasions—on Clark Street, Howard Street, and Damon Street—leaping out each time to menace drivers with pepper spray.^{lvi} On the third attempt, another agent told him: “Hey man, maybe not get out of the car this time.”^{lvii}

Available bystander video from that afternoon corroborates Moriarty’s account. A video taken in Rogers Park from that afternoon—with the detainees from Evanston still in the SUV—captures a bicyclist yelling, “ICE! ICE! ICE!” at the SUV being driven by Agent Donahue, who is then seen shaking his pepper spray at the bicyclist.^{lviii} The bicyclist told Unraveled Press, “He had the energy of someone that was about to snap and spray us or get out of the car and grab us.”^{lix} Several blocks later, the video shows Agent Donahue confronting a motorist in the middle of the street with a chemical agent before getting back to his vehicle and driving away.^{lx}

Agents eventually encountered Evanston Police Department Sgt. Daniel Keeler.^{lxi} Africano is captured on body worn camera stating: "I feel like I need medical attention."^{lxii} Donahue cut him off: "I'm a paramedic. He's fine."^{lxiii} No public record confirms Donahue holds any medical certification. Moriarty heard Africano repeatedly ask Donahue and Parsons for medical attention while being transported to no avail.^{lxiv} All three were released after approximately five and a half hours. None were told the reason for their arrest, formally processed, or given any law enforcement paperwork. The driver and Moriarty were released without charges. Africano was charged with one count of assaulting federal officers; his case was later dismissed.

As described further in the Final Report, Agent Donahue has been documented using excessive force in other incidents during Operation Midway Blitz demonstrating a lack of accountability by DHS for misconduct of federal immigration agents.

TRO Violation

On November 3, 2025, plaintiffs in Chicago Headline Club et al. v. Kristi Noem et al., No. 25-cv-12173 (N.D. Ill.), filed a Notice of Violations citing three provisions of a previously issued Temporary Restraining Order that had been breached: excessive force against a person posing no threat (1(h)); seizure of a non-violent protester without probable cause (1(j)); and failure to wear visible identification (2).^{lxv} By the time agents bashed Africano's head on the pavement and aimed a gun at unarmed bystanders, a federal court had already ordered them to stop. They did it anyway.

AFTERMATH

Mayor Daniel Biss stated that federal agents "beat people up" and "abducted" residents: "Get the hell out of Evanston."^{lxvi} According to the City, the FBI is investigating, though it is unclear whom.^{lxvii} Roughly 200 community members gathered outside Chute Middle School in Evanston, near the sight of the crash.^{lxviii} The 8-year-old daughter of Sarah Hines, the driver who observed the crash, had nightmares for months; she "still tells me that she's afraid that Donald Trump is going to come to Evanston and kill people."^{lxix} Despite the confrontation, trick-or-treating in Evanston and Skokie went forward.

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:

- The forcible extraction of a motorist who rear-ended the SUV driven by Agent Donahue does not appear to comport with standard law enforcement practice. Agent Donahue described the motorist following them for some time and repeatedly blowing a whistle at them.^{lxx} He described the crash as occurring after stopping his vehicle to address the motorist and the motorist failing to stop in time and rear-ending his vehicle.
- The brutal attack of Africano by multiple agents without apparent justification. Agent Donahue punched Africano in the head. While on the ground, Agent Parsons punched Africano's head multiple times while it was against the concrete,^{lxxi} dragged his face against the concrete while kneeling on his back, and placed him in a deadly chokehold—^{lxxii} after Africano was already restrained. This is corroborated by sworn declarations, bystander video, and IAC interviews with Moriarty and Hines. DHS's justification that Africano grabbed Agent Parsons's genitals is unsupported by any video and would nevertheless not justify force that is unrelated to ceasing Africano's alleged conduct.
- The assault of Moriarty when taken and restrained on the ground, as declared in Moriarty's declaration and shown in bystander video. The agents' conduct also violates agency policy requiring agents to use objectively reasonable force when conducting a stop or arrest.
- Agent Donahue drew and aimed his service pistol at unarmed protesters twice within 45 seconds. At one point, he threatened to shoot them. The threatening acts were confirmed by several witnesses and were recorded by bystanders, including in the Brooks declaration, Moriarty interview, and Hines interview.^{lxxiii}
- Agents detained three U.S. citizens for approximately 5.5 hours without probable cause, a reason for arrest, or paperwork. Agents transported the individuals secretly through multiple neighborhoods.
- Agent Donahue dismissed an injured detainee's repeated pleas for medical care by twice claiming to be a paramedic—a credential not verified by any public information. Even if Agent Donahue was credentialed or trained as a paramedic, he was directly involved in the use of force against the detainee and should have obtained appropriate medical assistance, as required by agency policy.^{lxxiv} This implicates policy directives and is a possible violation of the detainee's Fifth Amendment rights to due process.

- Agent Maxa sprayed Goodwill in the face from inches away without issuing a warning to gain compliance. Even if accepted as true, the alleged reason—Goodwill spitting—does not appear to present a justification for the subsequent force when Goodwill had already retreated from the vehicle and from Agent Maxa before being sprayed.
- Agent Donahue drove recklessly and in Evanston and Rogers Park when he ran red lights near schools; brake-checked three times while transporting detainees; and exited his vehicle to menace other drivers without weighing the risks to public safety in violation of agency policy on emergency driving and vehicle pursuits.
- Before conducting an objective and thorough investigation to ensure that public statements are accurate, DHS accepted the account of self-interested agents, including Agent Donahue, who is known to use ChatGPT to draft a report. This resulted in the apparent false attribution of the crash to a civilian and assertion that the beating of Africano was justified because he grabbed an agent's genitals—an account that is not substantiated by any available video or bystander account. This indicates that agents may have made material inaccuracies in officially submitted reports.

Endnotes

- i Natasha Korecki, Noem rejects Illinois Gov. Pritzker's request to pause immigration actions over Halloween weekend, NBC News, (Oct. 30, 2025), <https://www.nbcnews.com/politics/trump-administration/noem-rejects-illinois-gov-pritzkers-request-pause-immigration-enforcem-rcna240774>.
- ii Margo Milanowski et al., Federal immigration agents active in Evanston on Friday; multiple arrests made, Evanston RoundTable, (Oct. 31, 2025), <https://evanstonroundtable.com/2025/10/31/ice-detains-one-person-near-oakton-and-sherman-friday-morning/>.
- iii ICIRR text alert, approx. 11:00 a.m., Oct. 31, 2025; confirmed by EPD Cmdr. Ryan Glew. Daily Northwestern (Oct. 31, 2025). Bovino spotted near Pioneer Road and Payne Street. ABC7 Chicago, Federal Agents Arrest 3 US Citizens After Crash During Immigration Operation in Evanston, (Oct. 31, 2025), <https://abc7chicago.com/post/ice-evanston-today-news-cook-county-officials-speak-federal-immigration-agents-reportedly-area-halloween/18095995/>.
- iv Jonathan Bullington, On Halloween, 'State-Sponsored Terror' In Chicago And The North Suburbs, Chicago Tribune, (Oct. 31, 2025). <https://www.chicagotribune.com/2025/10/31/chicag-halloween-immigration-raids-evanston/>.
- v Hannah Webster et al., Evanston Community Mobilizes Amid Increased ICE And Border Patrol Enforcement On Halloween, Daily Northwestern, (Oct. 31, 2025), <https://dailynorthwestern.com/2025/10/31/top-stories/evanston-community-mobilizes-amid-increased-ice-and-border-patrol-enforcement-on-halloween/>.
- vi Id.
- vii Decl. of Kelly Mack (Exhibit 137), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-2 (N.D. Ill. Nov. 3, 2025).
- viii Id.
- ix Decl. of Kelly Mack (Exhibit 137), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188 (N.D. Ill. Nov. 3, 2025).
- x Decl. of Kelly Mack (Exhibit 137), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-2 (N.D. Ill. Nov. 3, 2025).
- xi District 65 Superintendent Angel Turner communication to families, 11:55 a.m.; ETHS Superintendent Marcus Campbell communication, 11:45 a.m., Oct. 31, 2025; Hannah Webster et al., Evanston Community Mobilizes Amid Increased ICE And Border Patrol Enforcement On Halloween, Daily Northwestern, (Oct. 31, 2025), <https://dailynorthwestern.com/2025/10/31/top-stories/evanston-community-mobilizes-amid-increased-ice-and-border-patrol-enforcement-on-halloween/>.
- xii IAC Interview with Frederick Goodwill (Jan. 29, 2026) (identifying Oakton Elementary, Chute Middle School, Pope John preschool, and an additional elementary school, plus the Jorge and Luz Maria Prieto Community Center and a retirement home, all within a four-block radius of the incident).
- xiii Hope Perry et al., Community Members Describe Confrontation With Federal Agents, Evanston RoundTable, (Nov. 1, 2025), <https://evanstonroundtable.com/2025/11/01/evanston-immigration-clash-car-crash/>.
- xiv IAC Interview with Dan Abu-Absi (Jan. 29, 2026); IAC Interview of Sarah Hines (Feb. 2, 2026); The Associated Press, Video shows immigration agent punching restrained man after car collision turns into confrontation, WHSV3, (Nov. 2, 2025), <https://www.wHSV.com/2025/11/02/video-shows-immigration-agent-punching-restrained-man-after-car-collision-turns-into-confrontation/>. See also IAC Interview with Frederick Goodwill (Jan. 29, 2026) (reporting vehicles "going through the intersection, over red lights, past through stop signs, weaving through traffic right by all these schools" in the days preceding Halloween).
- xv Department of Homeland Security (@DHSgov), X (Nov. 2, 2025 9:01am): <https://x.com/DHSgov/status/1984999303656436070>; Jemront Terry et al., Video shows CBP agent hitting man in the head while pinned down during arrest in Evanston, Illinois, CBS Chicago (Oct. 31, 2025), <https://www.cbsnews.com/chicago/news/evanston-skokie-immigration-operations/>.
- xvi CBP E-STAR Incident Report #25884, Chicago Headline Club v. Noem, No. 25-cv-12173 Dkt.. 337-16 (Jan. 29, 2026).
- xvii Agent Donahue is observed in an October 3, 2025 body worn camera video apparently drafting an incident report using ChatGPT. Bellingcat Investigation Team, Agents of Chaos: Unpacking the Actions of Border Patrol Agents Across the US, (Mar. 17, 2026), <https://www.bellingcat.com/news/2026/03/17/border-patrol-agents-of-chaos/>. Federal Judge Sarah Ellis generally addressed the use of ChatGPT by CBP agents during Operation Midway Blitz, noting that it "undermines their credibility and may explain the inaccuracy of some reports filed by CBP officers." Chicago Headline Club et al. v. Kristi Noem et al., No. 25-cv-12173 (N.D. Ill.). Agent Donahue's report neglects to mention several uses of force that are observed on video, including the punch of Africano and pointing his firearm twice at protesters, among other conduct.
- xviii IAC Interview with Dan Abu-Absi (Jan. 29, 2026).
- xix EPD Crash Report, Oct. 31, 2025 (identifying driver as Timothy Richard Donahue); see also, Alex Harrison, City has referred Halloween incident with feds to Illinois attorney general, Biss says, Evanston RoundTable (Nov. 18, 2025), <https://evanstonroundtable.com/2025/11/18/city-has-referred-halloween-incident-with-feds-to-illinois-attorney-general-biss-says/>; see also IAC Interview with Sarah Hines (Jan. 29, 2026)
- xx Kim "Katie" USA (@KimKatieUSA), X (Oct. 31, 2025): <https://x.com/KimKatieUSA/status/1984372479692001545>.
- xxi IAC Interview with Dan Abu-Absi (Jan. 29, 2026).
- xxii IAC Interview with Jennifer Moriarty (Jan. 26, 2026).

- xxiii IAC Interview with Jennifer Moriarty (Jan. 26, 2026).
- xxiv IAC Interview with Jennifer Moriarty (Jan. 29, 2026) (“I had my phone out. I didn’t say anything. I was about to hit record. I didn’t even get a chance, and I was on the ground.”)
- xxv Richard Cahan and Bob Chiarito, After beating by federal agent, man denied medical help, bodyworn camera footage shows, Evanston RoundTable, (Nov. 25, 2025). <https://evanstonroundtable.com/2025/11/25/after-beating-by-federal-agent-man-denied-medical-help-bodycam-footage-shows/>.
- xxvi IAC Interview of Sarah Hines (Feb. 2, 2026).
- xxvii Richard Cahan and Bob Chiarito, After beating by federal agent, man denied medical help, bodyworn camera footage shows, Evanston RoundTable, (Nov. 25, 2025). <https://evanstonroundtable.com/2025/11/25/after-beating-by-federal-agent-man-denied-medical-help-bodycam-footage-shows/>.
- xxviii Isthisabot321 (@Isthisabot321), Reddit (Oct. 2025): https://www.reddit.com/r/evanston/comments/1ol3pzh/oakton_and_asbury_video/.
- xxix CBP E-STAR Incident Report #25884, Chicago Headline Club v. Noem, No. 25-cv-12173 Dkt.. 337-16 (Jan. 29, 2026).
- xxx CBP E-STAR Incident Report #25884, Chicago Headline Club v. Noem, No. 25-cv-12173 Dkt.. 337-16 (Jan. 29, 2026).
- xxxi CBP E-STAR Incident Report #25884, Chicago Headline Club v. Noem, No. 25-cv-12173 Dkt.. 337-16 (Jan. 29, 2026).
- xxxii IAC Interview with Sarah Hines (Jan. 29, 2026) (agents “striking him in the head” while prone; “I can’t breathe, help me”).
- xxxiii IAC Interview with Jennifer Moriarty (Jan. 29, 2026) (agent twisting Africano’s leg “like they were trying to spiral fracture his leg”; Declaration of Kerry Littel (Exhibit 136), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188 (N.D. Ill. Nov. 3, 2025).
- xxxiv Declaration of Kerry Littel (Exhibit 136), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-1 (N.D. Ill. Nov. 3, 2025).
- xxxv IAC Interview with Jennifer Moriarty (Jan. 29, 2026) (Africano repeated in the vehicle: “I was just helping my brother move and we saw an accident and people on the ground.”).
- xxxvi Richard Cahan and Bob Chiarito, After beating by federal agent, man denied medical help, bodyworn camera footage shows, Evanston RoundTable, (Nov. 25, 2025). <https://evanstonroundtable.com/2025/11/25/after-beating-by-federal-agent-man-denied-medical-help-bodycam-footage-shows/>.
- xxxvii Declaration of Kerry Littel (Exhibit 136), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-1 (N.D. Ill. Nov. 3, 2025). (Video available [here](#)).
- xxxviii Decl. of David Brooks (Exhibit 138), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-3 ¶¶ 5-7 (N.D. Ill. Nov. 3, 2025) (video available [here](#)).
- xxxix Decl. of David Brooks (Exhibit 138), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-3 ¶¶ 5-7 (N.D. Ill. Nov. 3, 2025) (video available [here](#)).
- xl IAC Interview with Sarah Hines (Jan. 29, 2026) (saw “red-bearded federal agent” pull gun and “point it directly in people’s faces” at least twice; “I was absolutely sure that someone was gonna get shot”). IAC Interview with Jennifer Moriarty (Jan. 29, 2026) (saw Donahue point gun at “Blake” through front passenger window, “right in his face”).
- xli IAC Interview with Sarah Hines (Jan. 29, 2026) (“There was no chain of command. They were all yelling at each other. Nobody seemed to know what was going on.”). IAC Interview with Jennifer Moriarty (Jan. 29, 2026) (“It didn’t appear to me that there was any chain of command or that anybody was a check on each other”; agents “could do what they wanted”).
- xlii Provided by eye-witness David Broos. Available at: Richard Cahan and Bob Chiarito, After beating by federal agent, man denied medical help, bodyworn camera footage shows, Evanston RoundTable, (Nov. 25, 2025). <https://evanstonroundtable.com/2025/11/25/after-beating-by-federal-agent-man-denied-medical-help-bodycam-footage-shows/>.
- xliii IAC Interview with Frederick Goodwill (Jan. 29, 2026).
- xliv Video provided by witness. Available at: https://drive.google.com/file/d/19KMCaViW_YoNbhg_aUdjIhPuTk6KJlgi/view
- xliv Chicago Headline Club v. Noem, 1:15-cv-12173, Attachment to Ex. 138 (N.D. Ill. Nov. 20, 2025). Available at: <https://spaces.hightail.com/space/ERClkyY4Cj/files/fi-ee68b78b-2ba0-4355-b2a1-49e1d5243c7c/fv-946d3e13-2b8d-4317-bb54-fbe69fd3ef09/2025.10.31.MP4>
- xlvi Testimony of Dr. Rohini Haar at Dec. 18, 2025, Commission hearing.
- xlvii CBP E-STAR Incident Report #25884, Chicago Headline Club v. Noem, No. 25-cv-12173 Dkt.. 337-16.
- xlviii IAC Interview with Frederick Goodwill (Jan. 29, 2026).
- xliv IAC Interview with Frederick Goodwill (Jan. 29, 2026).
- I CBP Body Worn Camera, Axon 2025-10-31_1316_D01A2556T.

- li IAC Interview with Frederick Goodwill (Jan. 29, 2026). Decl. of Kerry Littel (Exhibit 136), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-1 ¶ 19 (N.D. Ill. Nov. 3, 2025); Decl. of David Brooks (Exhibit 138), Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188-3 ¶ 13 (N.D. Ill. Nov. 3, 2025)
- lii Posted to r/Illinois, Reddit (Oct. 31, 2025): <https://www.reddit.com/r/illinois/comments/1otmb9v/>.
- liii Hannah Webster et al., Evanston community mobilizes amid increased ICE and Border Patrol enforcement on Halloween, Daily Northwestern (Oct. 31, 2025), <https://dailynorthwestern.com/2025/10/31/top-stories/evanston-community-mobilizes-amid-increased-ice-and-border-patrol-enforcement-on-halloween/>.
- liv IAC Interview with Jennifer Moriarty (Jan. 29, 2026); EPD Sgt. Keeler BWC footage, released pursuant to FOIA.
- lv IAC Interview with Jennifer Moriarty (Jan. 29, 2026).
- lvi IAC Interview with Jennifer Moriarty (Jan. 29, 2026).
- lvii IAC Interview with Jennifer Moriarty (Jan. 29, 2026).
- lviii Unraveled (@unraveledpress.com), Bluesky (Nov. 2, 2025 12:16pm): https://bsky.app/profile/did:plc:s4t4ce7wbksdau5aqb5aqa4u/post/3m4o4fzio222p?ref_src=embed&ref_url=https%253A%252F%252Funraveledpress.com%252Fidentified-federal-agents-who-pointed-gun-punched-detainee-in-evanston%252F.
- lix Raven Geary, Identified: federal agents who pointed gun, punched detainee in Evanston, Unraveled Press (Nov. 20, 2025), <https://unraveledpress.com/identified-federal-agents-who-pointed-gun-punched-detainee-in-evanston/>.
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- lxi Richard Cahan & Bob Chiarito, After beating by federal agent, man denied medical help, bodycam footage shows, Evanston RoundTable, (Nov. 25, 2025), <https://evanstonroundtable.com/2025/11/25/after-beating-by-federal-agent-man-denied-medical-help-bodycam-footage-shows/>.
- lxii Evanston Police Department Body Worn Camera, Axon_2025-10-31_13:18_X60A60920, available at <https://evanstonroundtable.com/2025/11/25/after-beating-by-federal-agent-man-denied-medical-help-bodycam-footage-shows/>.
- lxiii Id.
- lxiv IAC Interview with Jennifer Moriarty (Jan. 29, 2026) (Donahue said "I'm a paramedic" in the alley behind Popeyes and repeated it at Sculpture Park; "he never did anything. He never looked at him"). Arizona Dept. of Health Services database; National Registry of EMTs. Evanston RoundTable (Nov. 25, 2025).
- lxv Chicago Headline Club v. Noem, No. 25-cv-12173, Dkt. 188 at 9 (N.D. Ill. Nov. 3, 2025) (citing TRO provisions 1(h), 1(j), and 2). See also Dkt. 188 at 6–8 (photographs showing agents without visible identification). The 7th Circuit Court of Appeals issued a stay of Judge Ellis' Preliminary Injunction on November 19, 2025, and the case was dismissed in early 2026.
- lxvi Rebecca Boone, Video shows immigration agent punching restrained man after car collision turns into confrontation, Associated Press (Nov. 2, 2025), <https://apnews.com/article/e723bf7878da1d99a5c7ee2a3780a79e>.
- lxvii Alex Harrison, FBI investigating recent incident involving feds in Evanston, tries to block city from releasing records, Evanston Roundtable (Nov. 6, 2025), <https://evanstonroundtable.com/2025/11/06/ready-to-edit-fbi-investigating-recent-incident-involving-feds-in-evanston-blocks-city-from-releasing-records/>.
- lxviii Hannah Webster et al., Evanston community mobilizes amid increased ICE and Border Patrol enforcement on Halloween, Daily Northwestern (Oct. 31, 2025), <https://dailynorthwestern.com/2025/10/31/top-stories/evanston-community-mobilizes-amid-increased-ice-and-border-patrol-enforcement-on-halloween/>.
- lxix IAC Interview with Sarah Hines (Jan. 29, 2026) ("My 8-year-old had nightmares for months about ICE. She still tells me that she's afraid that Donald Trump is going to come to Evanston and kill people.").
- lxx Regarding the following of officers to document and protest, Seth Stoughton told the Commission: "[P]eople and other vehicles are constitutionally allowed to follow officers" so long as it is not threatening to the 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>.
- lxxi Regarding the striking of someone's head against the concrete, Seth Stoughton told the Commission: "Striking a subject's head while the subject is on the ground is a pretty serious use of force. So it's limited to when the subject presents a correspondingly serious threat to officers. When you punch or strike someone's head while it's on the ground, their head is literally caught between a rock and a hard place. Their head can't move with the strike, so it has to absorb all of the force of that strike, and depending on the circumstances like the force of that blow and the nature of the."
- lxxii Regarding the use of chokeholds and vascular restraints, Seth Stoughton told the Commission: "[B]oth choke holds and vascular restraints are high level uses of force. They have the potential to damage

the structures of the neck including the trachea itself. And for that reason, most agencies prohibit both chokeholds and vascular restraints except in situations where deadly force is appropriate.”

Ixxiii Regarding how law enforcement should handle protest crowds, Seth Stoughton told the Commission: “Officers are taught a number of crowd controlled techniques, but maybe the most important one involves setting clear visual boundaries to delineate where people can be from where people cannot be.” They should keep in mind, “that crowds are constitutionally permitted to express anger and disagreement. Protests are protected by the 1st amendment. And that means that officers are trained to focus on actions that actually interfere with police operations, not just on the presence.”

Ixxiv Regarding the obligation that agents have to detainees during transport, Seth Stoughton told the Commission: “The standards in policing that governed detainee transport recognize a fairly simple principle. When someone is in your custody, they are in your care. And that means their safety is your responsibility. We don’t expect officers to diagnose medical issues. They aren’t doctors or paramedics. What that means is when it appears.”

Ixxv Corli Jay and Tonia Hill, Video Shows Feds ‘Choking’ A Black Man In East Garfield Park, The TRiiBE, (Oct. 1, 2025), <https://thetriibe.com/2025/10/video-shows-feds-choking-a-black-man-in-east-garfield-park/>.

Ixxvi *Id.*

Ixxvii *Id.*

Ixxviii Tonia Hill, Security Guard Describes Federal Agents Chasing Black Man In East Garfield Park, The TRiiBE (Oct. 3, 2025), <https://thetriibe.com/2025/10/security-guard-describes-federal-agents-chasing-black-man-in-east-garfield-park/>.

