

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

CHICAGO HEADLINE CLUB <i>et al.</i>	)	
	)	
Plaintiffs,	)	No. 25-cv-12173
	)	
v.	)	Hon. Sara L. Ellis,
	)	District Judge
KRISTI NOEM, Secretary of U.S.	)	
Department of Homeland Security, in her	)	
official capacity, <i>et al.</i> ,	)	
	)	
Defendants.	)	

PLAINTIFFS' NOTICE OF ALLEGED VIOLATION

Plaintiffs CHC, et al., by their attorneys, respectfully submit this notice of an alleged violation of the Court's Modified Temporary Restraining Order (TRO) in this matter, Dkt. 66, stating as follows:

1. Plaintiffs are filing this notice without completing a conferral with the government because of their significant concerns that Defendants are simply ignoring the Court's TRO.
2. This afternoon, Plaintiffs were made aware that this morning Defendant Bovino was personally present in the Little Village neighborhood of Chicago, apparently throwing tear gas into a crowd without justification.
3. A video of this incident can be accessed at the following URL:
<https://fb.watch/CWgVjEhREv/>.

4. Here is a still frame of the video:



5. In the video, Defendant Bovino appears to throw either one or two tear gas canisters over the heads of armed federal agents in front of him and in the direction of a crowd of individuals protesting, including an individual filming the encounter.

6. This action violates multiple paragraphs of this Court's TRO.

7. Plaintiffs are currently working on providing the Court with declarations and additional evidence regarding this incident, and they will confer with the government, but they wanted to bring it to the Court's attention as soon as possible given the flagrancy of the apparent violation.

8. Plaintiffs ask the Court to conduct an inquiry into this incident and order relief that the Court deems proper.

DATED: October 22, 2025

Respectfully submitted,

/s/ Steve Art

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