

Declaration of Stephen Griswold

I, Stephen Griswold, hereby declare:

1. I am the President of NABET-CWA Local 54041, which is a plaintiff in the above-captioned action. I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so competently as follows.

2. NABET-CWA Local 54041 is the Chicago chapter of the National Association of Broadcast Employees & Technicians nationwide membership union for news media. Local 54041 represents WLS (ABC affiliate), WFLD (Fox affiliate), WMAQ (NBC Universal affiliate), WSNS (Telemundo affiliate), and WGBO (Univision affiliate) as well as members at WITI (Fox affiliate) in Milwaukee, WI and WEHT (ABC affiliate) in Henderson, KY/Evansville, IN.

3. The objectives and principles of NABET-CWA Local 54041 shall be to aid workers employed in the broadcasting, distribution, telecasting, recording, filming and allied industries; to secure improved wages, hours and working conditions; to promote the organization of the unorganized in these industries.

4. I am an individual, dues-paying, member of NABET-CWA Local 54041 in good standing and have been a member since 2015. I have spent about 34 years in the media, including with KTVO-Kirksville, MO, KSHB-Kansas City, MO and multiple companies covering live sporting events across the country. My current job is serving as full-time President of NABET-CWA Local 54041 in Chicago, IL.

NABET-CWA Local 54041 Response to Protests

5. It is NABET-CWA Local 54041 policy to investigate all allegations of violence against our members in the course of their job duties, and we are dedicating advocacy for our members who have experienced harm.

6. Around Sunday, September 28, 2025, NABET-CWA Local 54041 became aware of a series of press violations by federal law enforcement officers in the City of Broadview, IL and began tracking these incidents.

7. To my knowledge and experience, the frequency of law enforcement assaults on press and other First Amendment violations have occurred at a frequency higher than any other period of protest.

8. Since October 1, 2025, I have had to divert significant time and resources from other organizational activities to address press rights violations by law enforcement personnel against our members. From the period of September 28th to October 3rd, I estimate that I spent at least seven hours personally responding to these incidents, including the need to call a special meeting of Executive Board members as well as speaking with individual companies about our members and the current company policies. Several members of our union have expressed interest in additional training opportunities to be better prepared for situations like this.

9. I have received at least two reports of incidents in which photographers have been struck by items while covering the Broadview protests.

10. In one concerning event that was reported to our organization, two of our members covering the activities at the Broadview facility were harassed and attacked by agents while in their company vehicles roughly 350 feet away from the entrance of the facility. One member ordered by agents to exit his highly marked vehicle exposing him to the deployed cloud of tear gas. He was not allowed an opportunity to put on his protective gear until after being exposed to the cloud of gas. A second member was in his marked news vehicle, roughly 25 feet away from the first member, and attempted to come assist his co-worker with his protective gear. While approaching, he clearly notified the agents that he was just trying to assist his co-worker. While clearly retreating from the situation, the second member was struck multiple times in the chest by agents with pepper balls. This was an undeniable overuse of force and a purposeful attack on the media and our members.

11. Our response efforts include but are not limited to checking on victim wellbeing, speaking with management on additional incidents, gathering information on reported cases of injury, and tips on safety and access on protests.

Continuing Press Coverage of ICE Raids

12. The raids by ICE and other DHS agencies, along with related protests, are extraordinarily important to the public and therefore important for the press to cover. I am extremely concerned that our members from all stations can and will be targets of these agents as they continue to escalate the amount of force used to purposefully intimate the protesters as well as the media. We have the right to cover such high-profile events in the market. They should be able to cover such events without fear or injury.

I declare under penalty of perjury of the laws of the State of Illinois and the United States that the foregoing is true and correct. Executed on October 3, 2025 in Chicago, Illinois.

Stephen Griswold

Stephen Griswold (Oct 3, 2025 20:18:15 CDT)

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