

Declaration of Jeff Arnold

I, Jeff Arnold, hereby declare:

1. I am the President of the Chicago Headline Club, 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.

Background on the Chicago Headline Club

2. Chicago Headline Club is one of the nation's largest chapters of the Society of Professional Journalists, which is a non-profit organization with no stock incorporated in the State of Illinois. The Chicago Headline Club is an independent nonprofit dedicated to supporting journalists and promoting the values of a free press across the region, with members from all levels and walks of journalism.

3. Chicago Headline Club is a membership organization. Any journalist working in the Chicagoland area is eligible to become a member of the Chicago Headline Club by paying our \$20 annual dues. We have had as many as 500 member-journalists and still remain of the nation's most active and recognized SPJ chapters despite having lower membership numbers than we once did.

4. Chicago Headline Club offers a variety of programming to benefit members and non-members alike, from local workshops to regional and national conferences. The organization supports journalists by offering training, networking opportunities, legislative advocacy, and scholarships for young journalists. Chicago Headline Club also maintains a Legal Defense Fund to support journalists' First Amendment rights.

5. I am an individual dues-paying member of the Chicago Headline Club in good standing and have been for 11 years. I have spent about 33 years in media, including as a

contributing writer for the New York Times, the Washington Post, and a staff writer for the Los Angeles Times. I am currently a national digital reporter at NewsNation.

6. For the Chicago Headline Club, I serve as the President meaning I oversee all club operations and am the top executive on our board of directors, for which I receive no compensation.

Chicago Headline Club Response to Protests

7. Around Sept. 18, 2025, the Chicago Headline Club became aware of a series of press violations by federal law enforcement officers in the City of Chicago and began tracking these incidents.

8. To my knowledge and experience, the frequency of law enforcement assaults on and arrests of the press have occurred at a frequency higher than any other period of protest in the Chicagoland area.

9. Since September, 2025, we have had to divert significant time and resources from other organizational activities to address press rights violations by law enforcement personnel. From the period of Sept. 27 and Oct. 4 I estimate that I spent at least 10 hours personally responding to these incidents, a significant portion of which involved DHS agents.

10. In response to the reports of federal law enforcement targeting our member journalists, CHC set up an incident tracking database where we document and confirm situations where journalists have been targeted by federal agents.

11. As of October 3, 2025, we have six confirmed incidents and another four reported incidents of assaults on journalists by federal agents.

12. Among those confirmed incidents is what happened to a CBS news reporter who was driving near the Broadview facility in a clearly marked press van on a public street when

federal law enforcement officers shot pepperballs into her vehicle through the open driver side front window.

13. Another local independent journalist was taken into federal custody while reporting on the protests at Broadview on Sept. 27, 2025. We were told that he was released after six hours and was not charged. We received information that he had been reporting on a deadly shooting involving a migrant in Franklin Park, Ill., and was personally known by ICE officers. We learned that at a previous protest, ICE officers forcibly removed the reporter's media credentials from around his neck.

Personal Experience Reporting at Broadview

14. Among my many reporting assignments in my career, I have covered political protests, and in my role for NewsNation I have been assigned coverage of the recent protests at Broadview. The law enforcement actions I have witnessed in video accounts captured by our cameras and described by my television colleagues at Broadview are the most aggressive response to protesters I have seen. I did not see any protesters engage in or threaten physical violence towards any federal officers. Nevertheless, the federal officers' indiscriminately deployed various chemical and kinetic weapons on the crowd gathered on Harvard Street and the adjoining sidewalk, protesters, legal observers, and journalists alike.

15. As part of my fact-finding mission for the Headline Club, I spoke with one of my television reporter colleagues who was hit with pepper spray by federal agents while covering the protests at Broadview on Sept. 27. She informed me she was visibly identifiable as a reporter, holding a microphone that said NewsNation on it. When she was hit she was following instructions, in the process of backing up into the sidewalk on Harvard Street, at least 75 feet from the gate between Harvard and Beach Streets.

Continuing Press Coverage of Broadview

16. The protests at Broadview, along with the immigration enforcement actions there, are extraordinarily important to the public and therefore important for the press to cover. In addition, the protests themselves, and the response of federal law enforcement, have become a major national and international news story as protesters are met with escalating amounts of force than any other protests since at least 2020.

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on October 3, 2025 in Chicago, Illinois.



Jeffrey Arnold (Oct 3, 2025 18:13:05 CDT)

Jeff Arnold