

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

KASSANDRA ROSADO and KREISAU GROUP
LLC,

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as
Attorney General, and

KRISTI NOEM, in her official capacity as Secretary
of Homeland Security,

Defendants.

Civil Action No.: 1:26-cv-01532

Hon. Jorge L. Alonso

**DECLARATION OF COLIN MCDONELL IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

I, Colin McDonell, declare as follows:

1. I am a Senior Attorney at the Foundation for Individual Rights and Expression (FIRE). I am a licensed attorney in good standing in California and Pennsylvania, and I represent the plaintiffs in the present case.

2. Attached as Exhibit A to this declaration is a true and accurate copy of a video titled "Video shows masked federal agents handcuffing Turkish student at Tufts University" posted on YouTube by the Associated Press on March 26, 2025. The video is also available at <https://www.youtube.com/watch?v=7-fSpi7ZHoQ>.

3. Attached as Exhibit B to this declaration is a true and accurate copy of a video titled "Video shows father being detained by ICE while dropping child off at preschool" posted on

YouTube by CBS News on July 22, 2025. The video is also available at <https://www.youtube.com/watch?v=HWJwYtMJ4Rg>.

4. Attached as Exhibit C to this declaration is a true and accurate copy of a video titled “Federal agents pepper spray 1-year-old girl in Cicero after Little Village clashes, dad says: VIDEO” posted on YouTube by ABC 7 Chicago on November 9, 2025. The video is also available at https://www.youtube.com/watch?v=_GA15qWaa-8.

5. Attached as Exhibit D to this declaration is a true and accurate copy of an article titled “Minneapolis Family, Including 6 Children, Tear-Gassed After They Were Caught in Clash Between ICE and Protesters” published by People on January 18, 2026. The article is also available at <https://people.com/minneapolis-family-including-6-children-tear-gassed-by-ice-agents-11887948> [<https://perma.cc/6FTR-S32Y>].

6. Attached as Exhibit E to this declaration is a true and accurate copy of an article titled “‘Madness’: two US citizens violently detained by ICE in Minnesota, officials say” published by The Guardian on January 13, 2026. The article is also available at <https://www.theguardian.com/us-news/2026/jan/13/ice-immigration-target-minnesota> [<https://perma.cc/L24P-AYUS>].

7. Attached as Exhibit F to this declaration is a true and accurate copy of an article titled “Timeline: A Moment-by-Moment Look at the Shooting of Alex Pretti” published by The New York Times on January 25, 2026. The article is also available at <https://www.nytimes.com/interactive/2026/01/24/us/minneapolis-shooting-alex-pretti-timeline.html> [<https://perma.cc/ZW5D-M5L4>].

8. Attached as Exhibit G to this declaration is a true and accurate copy of an excerpt of video of a speech by Donald Trump in Concord, North Carolina on October 21, 2024. The full

video is available at <http://rollcall.com/factbase/trump/transcript/donald-trump-speech-campaign-rally-concord-north-carolina-october-21-2024/#108> [transcript also available at <https://perma.cc/Z777-K39K>].

9. Attached as Exhibit H to this declaration is a true and accurate copy of an article titled “Tom Homan, President-elect Trump’s border czar, says deportation plan will start in Chicago” published by CBS News on December 11, 2024. It is also available at <https://www.cbsnews.com/chicago/news/tom-homan-trump-border-czar-chicago/> [<https://perma.cc/L2WD-3SZ3>].

10. Attached as Exhibit I to this declaration is a true and accurate copy of Executive Order No. 14,159 issued on January 20, 2025. It is also available at <https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-02006.pdf> [<https://perma.cc/4974-6GAB>].

11. Attached as Exhibit J to this declaration is a true and accurate copy of a statement from the Department of Homeland Security on January 21, 2025. It is also available at <https://www.dhs.gov/news/2025/01/21/statement-dhs-spokesperson-directives-expanding-law-enforcement-and-ending-abuse> [<https://perma.cc/W55K-JTH5>].

12. Attached as Exhibit K to this declaration is a true and accurate copy of a video titled “Trump’s ICE teams already on the ground in cities like Chicago” posted to YouTube by FOX 32 Chicago on January 21, 2025. It is also available at <https://www.youtube.com/watch?v=N8nGICXS8IQ>.

13. Attached as Exhibit L to this declaration is a true and accurate copy of an article titled “Immigration Raids Detained 100 People in Chicago Area, Top Cop Says, But He Doesn’t Know How Many Have Criminal Records” published by WTTW News on January 28, 2025. It is

also available at <https://news.wttw.com/2025/01/28/immigration-raids-detained-100-people-chicago-area-top-cop-says-he-doesn-t-know-how-many> [<https://perma.cc/SZ5X-URT5>].

14. Attached as Exhibit M to this declaration is a true and accurate copy of an article titled “Immigrant Communities in Hiding: ‘People Think ICE Is Everywhere’” published by The New York Times on January 30, 2025. It is also available at <https://www.nytimes.com/2025/01/30/us/immigrant-communities-hiding-ice.html> [<https://perma.cc/VYY3-9BZE>].

15. Attached as Exhibit N to this declaration is a true and accurate copy of a video titled “Fear of ICE raids impacting Chicago neighborhood” posted to YouTube by FOX 32 Chicago on January 21, 2025. It is also available at <https://www.youtube.com/watch?v=LE4HqaCmNEU>.

16. Attached as Exhibit O to this declaration is a true and accurate copy of an article titled “In Trump's first week as president, angst over deportation threats rises” published by the Chicago Sun-Times on January 25, 2025. It is also available at <https://chicago.suntimes.com/immigration/2025/01/25/donald-trump-immigration-deportation-threats-ice-community-schools-churches-sanctuary-chicago> [<https://perma.cc/W9EG-2JEB>].

17. Attached as Exhibit P to this declaration is a true and accurate copy of an article titled “Trump officials issue quotas to ICE officers to ramp up arrests” published by The Washington Post on January 26, 2025. It is also available at <https://www.washingtonpost.com/immigration/2025/01/26/ice-arrests-raids-trump-quota/> [<https://perma.cc/4U4B-XM5N>].

18. Attached as Exhibit Q to this declaration is a true and accurate copy of a statement by U.S. Immigration and Customs Enforcement on January 26, 2025. It is also available at

<https://www.ice.gov/news/releases/statement-us-immigration-and-customs-enforcement>

[<https://perma.cc/YKP8-SKHC>].

19. Attached as Exhibit R to this declaration is a true and accurate copy of a press release titled “ICE Launches Operation Midway Blitz in Honor of Katie Abraham to Target Criminal Illegal Aliens Terrorizing Americans in Sanctuary Illinois” published by the Department of Homeland Security on September 8, 2025. It is also available at <https://www.dhs.gov/news/2025/09/08/ice-launches-operation-midway-blitz-honor-katie-abraham-target-criminal-illegal> [<https://perma.cc/H3PU-WHN2>].

20. Attached as Exhibit S to this declaration is a true and accurate copy of an article titled “ICE officer said his injuries were ‘nothing major’ after deadly shooting near Chicago, video shows” published by the Chicago Sun-Times on September 22, 2025. It is also available at <https://chicago.suntimes.com/the-watchdogs/2025/09/22/ice-officer-injuries-nothing-major-deadly-franklin-park-shooting-mexican-immigrant-chicago-video> [<https://perma.cc/69EM-54HD>].

21. Attached as Exhibit T to this declaration is a true and accurate copy of an article titled “Judge dismisses charges against 2 people accused of ramming vehicle of federal agents conducting Chicago immigration sweeps” published by ABC News on November 20, 2025. It is also available at <https://abcnews.go.com/US/doj-drops-charges-2-people-accused-ramming-vehicles/story?id=127714651> [<https://perma.cc/2SB8-6QS4>].

22. Attached as Exhibit U to this declaration is a true and accurate copy of an article titled “‘I wanted to do something to fight back’: This iPhone app alerts users to nearby ICE sightings” published by CNN on June 30, 2025. It is also available at

<https://www.cnn.com/2025/06/30/tech/iceblock-app-trump-immigration-crackdown>

[<https://perma.cc/UD8S-BLZZ>].

23. Attached as Exhibit V to this declaration is a true and accurate copy of an excerpt of a video of a White House press briefing on June 30, 2025. The full video is available at <https://www.whitehouse.gov/videos/press-secretary-karoline-leavitt-briefs-members-of-the-media-june-30-2025/>.

24. Attached as Exhibit W to this declaration is a true and accurate copy of a statement by ICE acting Director Todd M. Lyons on June 30, 2025. It is also available at <https://www.ice.gov/news/releases/statement-ice-acting-director-todd-m-lyons-news-coverage-ice-spotting-app> [<https://perma.cc/QTW8-92N8>].

25. Attached as Exhibit X to this declaration is a true and accurate copy of a video of an interview of Tom Homan published by Benny Johnson to X on June 30, 2025. It is also available at <https://x.com/bennyjohnson/status/1939722973373497632> [<https://perma.cc/77VE-9SZK>].

26. Attached as Exhibit Y to this declaration is a true and accurate copy of a video titled “Kristi Noem wants to prosecute CNN over report on ICEBlock app that tracks ICE agents” posted on YouTube by The National Desk on July 2, 2025. It is also available at https://www.youtube.com/shorts/x-3RJ03_Yo.

27. Attached as Exhibit Z to this declaration is a true and accurate copy of an excerpt of a video titled “Pam Bondi scolds CNN for allegedly promoting ICE tracker app: ‘Shame on them!’” published by Fox News on June 30, 2025. The full video is available at <https://www.foxnews.com/video/6375072267112>.

28. Attached as Exhibit AA to this declaration is a true and accurate copy of an article titled “Apple removes ICE tracking apps after Trump administration says they threaten officers”

published by CNN on October 3, 2025. It is also available at <https://www.cnn.com/2025/10/03/tech/iceblock-apple-removed-trump> [https://perma.cc/SM4H-RQE4].

29. Attached as Exhibit BB to this declaration is a true and accurate copy of an article titled “Apple takes down ICE tracking apps after pressure from Bondi DOJ” published by Fox Business on October 2, 2025. It is also available at <https://www.foxbusiness.com/politics/apple-takes-down-ice-tracking-app-after-pressure-from-ag-bondi> [https://perma.cc/7KWC-YQSQ].

30. Attached as Exhibit CC to this declaration is a true and accurate copy of an excerpt of a video of a roundtable discussion at the White House on October 8, 2025. The full video is available at <https://rollcall.com/factbase/trump/transcript/donald-trump-remarks-antifa-roundtable-october-8-2025/> [transcript also available at https://perma.cc/ZQ63-LUVP].

31. Attached as Exhibit DD to this declaration is a true and accurate copy of an X post published by Laura Loomer on October 12, 2025. It is also available at <https://x.com/LauraLoomer/status/1977345952718438707> [https://perma.cc/P9H6-F7MP].

32. Attached as Exhibit EE to this declaration is a true and accurate copy of an X post published by Laura Loomer on October 13, 2025. It is also available at <https://x.com/LauraLoomer/status/1977812771799461893> [https://perma.cc/84VD-494M].

33. Attached as Exhibit FF to this declaration is a true and accurate copy of Apple’s App Store Review Guideline 1.1.1, last updated in March 2020. It is also available at <https://developer.apple.com/app-store/review/guidelines/> [https://perma.cc/VE3M-X43H].

34. Attached as Exhibit GG to this declaration is a true and accurate image of a portion of Apple’s report of apps removed from the App Store due to Guideline or Developer Program License Agreement (DPLA) Violations in 2022, showing removals under Guideline 1.1.1.

35. Attached as Exhibit HH to this declaration is a true and accurate image of a portion of Apple's report of apps removed from the App Store due to Guideline or Developer Program License Agreement (DPLA) Violations in 2023, showing removals under Guideline 1.1.1.

36. Attached as Exhibit II to this declaration is a true and accurate copy of Apple's report of apps removed from the App Store due to Guideline or Developer Program License Agreement (DPLA) Violations in 2024.

37. Attached as Exhibit JJ to this declaration is a true and accurate copy of page 74 of the book *Save America* by President Donald J. Trump, published by Winning Team Publishing on September 3, 2024.

38. Attached as Exhibit KK to this declaration is an X post by Attorney General Pamela Bondi on October 14, 2025. It is also available at <https://x.com/AGPamBondi/status/1978104370186137616> [https://perma.cc/URN8-C6WJ].

39. Attached as Exhibit LL to this declaration is an X post by Department of Homeland Security Secretary Kristi Noem on October 14, 2025. It is also available at https://x.com/Sec_Noem/status/1978182132414448008 [https://perma.cc/Y299-C5UV].

40. Attached as Exhibit MM to this declaration is a true and accurate copy of the Meta webpage "Removing Pages and groups," last updated on November 12, 2024. It is also available at <https://transparency.meta.com/enforcement/taking-action/removing-pages-groups/> [https://perma.cc/3T3K-HLGA].

41. Attached as Exhibit NN to this declaration is a true and accurate copy of the Meta webpage "Coordinating Harm and Promoting Crime," last updated on June 26, 2025. It is also available at <https://transparency.meta.com/policies/community-standards/coordinating-harm-promoting-crime/> [https://perma.cc/8JLQ-77SF].

42. Attached as Exhibit OO to this declaration is a true and accurate copy of an article titled "Facebook suspends popular Chicago ICE-sightings group at Trump administration's request" published by the Chicago Sun-Times on October 14, 2025. It is also available at <https://chicago.suntimes.com/immigration/2025/10/14/facebook-suspends-popular-ice-sightings-group-at-trump-administrations-request> [https://perma.cc/N3R5-DSMZ].

43. Attached as Exhibit PP to this declaration is a true and accurate copy of an X post by U.S. Immigration and Customs Enforcement on January 22, 2026. It is also available at <https://x.com/ICEgov/status/2014368770630808051> [https://perma.cc/S48C-FK6K].

44. Attached as Exhibit QQ to this declaration is a true and accurate copy of an X post by U.S. Immigration and Customs Enforcement on June 10, 2025. It is also available at <https://x.com/ICEgov/status/1932543795507106216> [https://perma.cc/RJ6A-47CR].

45. Attached as Exhibit RR to this declaration is a true and accurate copy of an X post by U.S. Immigration and Customs Enforcement on June 11, 2025. It is also available at <https://x.com/ICEgov/status/1933010171363578356> [https://perma.cc/JE2Y-RAAJ].

46. Attached as Exhibit SS to this declaration is a true and accurate copy of an excerpt of a video of a press conference held by Donald Trump in Palm Beach, Florida, on January 7, 2025. The full video is available at <https://www.c-span.org/program/news-conference/president-elect-trump-delivers-remarks-to-the-press/654093>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 25, 2026.



Colin McDonell

EXHIBIT A

**Video shows masked federal agents
handcuffing Turkish student at Tufts University
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT B

**Video shows father being detained by ICE
while dropping child off at preschool
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT C

**Federal agents pepper spray 1-year-old girl in Cicero after Little Village
clashes, dad says: VIDEO
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT D



SUBSCRIBE



Minneapolis Family, Including 6 Children, Tear-Gassed After They Were Caught in Clash Between ICE and Protesters

Destiny Jackson, 26, said the tear gas caused her 6-month-old baby to stop breathing

By [Torja Sheffield](#) | Published on January 18, 2026 05:38PM EST

41 COMMENTS



Destiny Jackson, whose family was tear-gassed by ICE agents.

Credit : KARE 11/Youtube

NEED TO KNOW

- A Minnesota woman says she and her family were tear-gassed by ICE agents while attempting to get home from her son's basketball game

SKIP TO CONTENT

- The woman said she had to give her 6-month-old boy CPR as he stopped breathing after being exposed to the gas

A woman says her family was [tear-gassed](#) after getting caught between protesters and federal ICE agents — and she had to give her baby CPR during the terrifying incident.

Destiny Jackson, 26, told [CNN](#) that she, her husband and their six children were attempting to drive home from her son's basketball game when they encountered an ICE protest in Minneapolis on the evening of Wednesday, Jan. 14.



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She said she and her husband had not been aware that a protest would be taking place on their route home, and their car soon became stuck amid protesters and parked vehicles.

Jackson told CNN that she heard someone outside the car yell, "It's about to go down!" at which point she saw federal agents arrive on the scene.

She said her husband attempted to back up, but soon realized there were [ICE agents](#) on either side of the vehicle, and so he opted to keep the car in place so that they didn't accidentally hit anyone.

"We've seen what happened to Renee [Good]," Jackson said of the decision, referring to the mother of three who was shot and killed by an ICE agent in Minneapolis on Jan. 7.

Want to keep up with the latest crime coverage? Sign up for [PEOPLE's free True Crime newsletter](#) for breaking crime news, ongoing trial coverage and details of intriguing unsolved cases.

"An ICE agent, one of them, yells in my window, like, 'Get the F out of here.' And my husband's like 'We're trying,' " Jackson added.

detentions in Minneapolis, Minnesota, on January 16, 2026



Anti-ICE demonstrators in Minneapolis on Jan. 16, 2026.

Credit: Octavio JONES / AFP via Getty

Jackson told CNN that the next few moments happened quickly. She recalled that she saw and heard tear gas canisters being hurled in her family's direction, noting that one of them rolled under their vehicle.

She said she then felt the explosion of the can under their car, which caused the [airbags to deploy](#) and the safety locks to automatically activate — locking her, her husband and her children — ages 11 to 6 months — inside the car.

She said the car began to fill with black smoke, effectively blinding them and obstructing their breathing.

"I was feeling around, like I was hitting my son's window, and I worked my way to his lock, and then I reached over my other two younger kids and I unlocked that lock," she recalled to CNN.



People gather for a vigil in Minneapolis following the shooting of Renee Good by an ICE agent Jan. 7, 2026.

Credit: David Berding/Getty

She said her husband was ultimately able to get out of the driver's side door, at which point they worked on getting their children out of the tear-gas-filled vehicle with the help of a bystander.

"I couldn't breathe. And I'm pointing at the car and I'm saying, 'I have more kids, I have more kids,' " Jackson told CNN.

She said that once all of the children were out of the car, a kind neighborhood resident led her family to safety inside their home — but it was then that she realized her 6-month-old baby son was not breathing.

Jackson said she began giving the infant mouth-to-mouth while her other children used milk to try to wash the tear gas out of their eyes.

"In the midst of like doing mouth-to-mouth, I stopped and I looked at my baby and I was just like 'Wake up, you have to,' " she said. "I just felt like I'm gonna give you every breath I have."

She said her baby [began breathing](#), and she ultimately accompanied all of her children to the hospital, where they received care.

SUBSCRIBE

Venezuelan Man Shot by ICE Agent in Minneapolis, Causing 'Unlawful' Protests

ICE agents stand at the scene where

Minneapolis Pastor Says He Was Detained by ICE After Joining Protest, Told 'You're White' and 'Wouldn't Be Any Fun Anyway' on Release

Kenny Callaghan

In a statement to CNN, the City of Minneapolis confirmed that tear gas used on the crowd that evening caused a 6-month-old child inside a vehicle "to experience breathing difficulties."

They added that police and emergency responders reached the affected family and found "the infant was breathing and stable, but [in] serious condition."

The City of Minneapolis and the Minneapolis Police Department did not immediately respond to PEOPLE's request for comment.

In a statement to PEOPLE, Department of Homeland Security Assistant Secretary Tricia McLaughlin said the federal agents present during the Jan. 14 protest "followed their training and reasonably deployed crowd control measures."

She added that the agents were [not targeting](#) the family.

LEAVE A COMMENT ↓

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EXHIBIT E

'Madness': two US citizens violently detained by ICE in Minnesota, officials say

Two Target employees forced to the ground, then into SUV, then dumped in different parking lot



📷 US border patrol commander Gregory Bovino walks through a Target store in St Paul, Minnesota, on 11 January. Photograph: Adam Gray/AP

Richard Luscombe

Tue 13 Jan 2026 15.55 EST

Two US citizens who are employees of a [Minnesota](#) Target store were detained by federal immigration agents, before at least one was dumped in a different parking lot, community leaders and a Democratic politician have alleged.

The Richfield incident is one in a growing number of violent encounters between civilians and federal agents captured on video since the [killing of Renee Nicole Good](#) by the ICE officer Jonathan E Ross on 7 January.

According to the Minnesota state representative Michael Howard, who represents Richfield, and [video](#) footage taken by witnesses, a team of [ICE](#)

agents that had assembled at the Target on 8 January forced two employees to the ground at the entrance to the store, then bundled them into a dark SUV.

Gregory Bovino, the senior US border patrol official who has become the public face of the Trump administration's immigration enforcement action in Minnesota and elsewhere, was present during the incident.

A later clip [posted on X](#) purports to show one of the two in a distressed state at a different parking lot. In the clip, he is crying, and a bystander is heard saying that he is bleeding, although blood is not visible in the video. "They threw me on the fucking ground," he says between sobs.

The Guardian has not been able to verify the authenticity of the video clips, the first of which was shared by the Department of Homeland Security. In a [post on X](#) on Monday, the agency said: "This individual was arrested for assaulting federal law enforcement officers." The post cited the federal law [prohibiting](#) "assaulting, resisting, or impeding federal officers".

The post did not identify which of the two detained employees it was referring to and gave no details of an alleged assault on any officer. The post also had no explanation of how or why the person was set free soon after his arrest.

Howard, however, said he had spoken to both of the people who were detained and criticized what he called an ICE "rampage across Minnesota" in the wake of Good's killing.

"In Richfield, federal agents, including Greg Bovino, senior commander of US Border Patrol, entered Target without a warrant, physically assaulted, and arrested two Target employees, both US citizens," he said in an [update to his webpage](#).

"They have now been released, but sustained injuries and untold trauma while their rights were trampled for no reason whatsoever."

In a subsequent interview [with the Minnesota Star Tribune](#), he added: "I can't believe in the year 2026, in our country, we have two workers, they're US citizens, violently arrested and hauled away. It's madness."

Neither ICE nor the Department of Homeland Security (DHS) responded to questions.

Another video from the scene from TikTok user lokatorres17 appearing to capture the moments before the detentions shows one of the two people [walking backwards into the store](#) and away from a lone officer who is pursuing him. The officer then lunges at the person and brings him to the ground as other agents rush in.

“If this doesn’t make your blood boil, I don’t know what will,” Howard said in his statement. Case: 1:26-cv-01532 Document #: 10-3 Filed: 02/26/26 Page 14 of 83 PageID #:96

“We are actively working to provide support to our community members. We are also communicating with Target about their responsibility to better protect their workers and customers. And we continue to call on ICE to GET OUT of Minnesota.”

The Target press office did not respond to a request for comment.

In [a statement and interviews with the Guardian](#), Good’s family on Monday called on people outraged by ICE’s actions to root their conversations in “humanity, empathy, and care for the family most affected”.

Family members – most of them relatives of Good’s late husband, Timmy Macklin Jr – said they hoped the “unimaginable loss” the family had suffered would lead to meaningful change.

“There’s been so much hateful rhetoric back and forth, and what’s been missed is painting a picture of who Renee was,” Good’s sister-in-law Jessica Fletcher said, in a statement that made no specific mention of ICE.

The attorney general of Minnesota, Keith Ellison, said Monday night that he was [filing a lawsuit](#) against the Trump administration.

“DHS’s use of excessive and lethal force, their warrantless, racist arrests, their targeting of our courts, our churches, houses of worship and schools are a violation of the Administrative [Procedure] Act on arbitrary and capricious federal actions,” Ellison said at a news conference. “And we ask that the courts will end the surge of thousands of DHS agents in Minnesota.”

EXHIBIT F



Stills from witness videos

Timeline: A Moment-by-Moment Look at the Shooting of Alex Pretti

By Bora Erden, Devon Lum, Helmuth Rosales, Elena Shao, Haley Willis and Ashley Wu Updated Jan. 25, 2026, 5:50 p.m. E.T.

Federal agents shot and killed a 37-year-old Minneapolis resident, Alex Jeffrey Pretti, at about 9 a.m. Central time on Saturday morning. A video shared with The New York Times by a witness and her lawyer, as well as other video footage posted on social media, documents the violent scene, where agents appear to fire at least 10 shots in a span of five seconds.

The footage seems to contradict the Department of Homeland Security's account of the encounter, which the agency said began after an individual armed with a handgun approached the federal agents with the intent to "massacre" them.

48 seconds before shooting



Still from video shared with The Times. The New York Times

Videos show a small group of civilians standing in the middle of a street where a person was detained on the ground; the civilians are speaking to federal agents. Mr. Pretti appears to be filming the scene, and he walks closer to the federal agents while holding his phone.

Then an agent shoves two civilians from one side of the street to the other, pushing them toward a white S.U.V.

28 seconds before



Still from video shared with The Times. The New York Times

For a second time, the agent pushes the civilian with the orange backpack. The civilian falls to the ground near the white S.U.V.

25 seconds before



Mr. Pretti tries to put himself between the D.H.S. agent and the two civilians. Footage shows the same agent squirting pepper spray in the direction of Mr. Pretti's face. (This agent will later fire shots at Mr. Pretti.)

Mr. Pretti is holding his phone in one hand, and he holds his other hand up to shield himself from the spray.

23 seconds before



Still from video shared with The Times. The New York Times

Mr. Pretti appears to be trying to help the civilian with the orange backpack stand back up as the agent continues to pepper-spray the group.

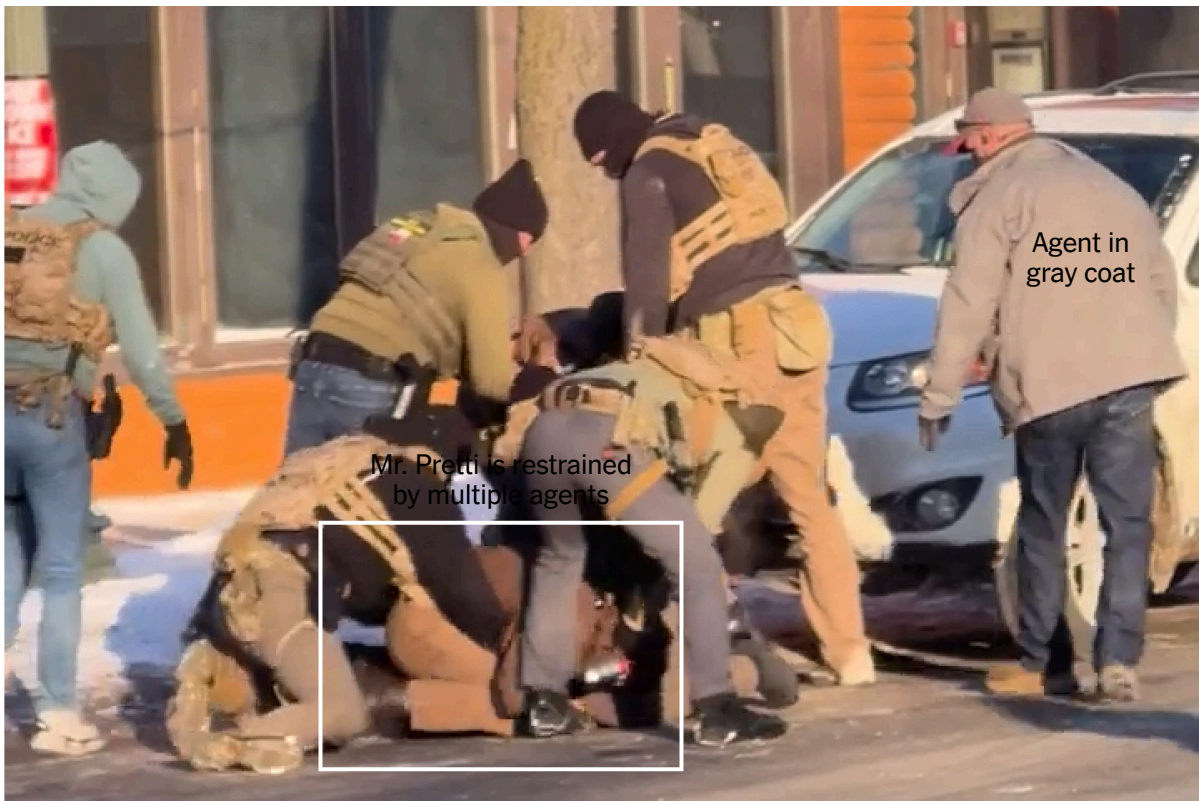
17 seconds before



Still from video by witness shared with The Times. The New York Times

Several agents grab Mr. Petti, who is still holding his phone. Additional agents approach and try to pin Mr. Petti to the ground.

11 seconds before



Mr. Pretti is surrounded by a group of seven agents, some of whom have wrestled him to the ground. One of the agents, who wears a gray coat, gets closer to Mr. Pretti. The agent's hands are empty as he reaches for Mr. Pretti, while the other agents hold Mr. Pretti down on his knees. At the same time, another agent strikes Mr. Pretti repeatedly with a pepper spray canister.

1 second before



Still from video shared with The Times. The New York Times

An eighth agent joins the group. The agent in the gray coat appears to pull a gun from near Mr. Pretti's right hip. The agent then begins to move away from the skirmish with the weapon.

At the same time, another agent unholsters his firearm and points it at Mr. Pretti's back.

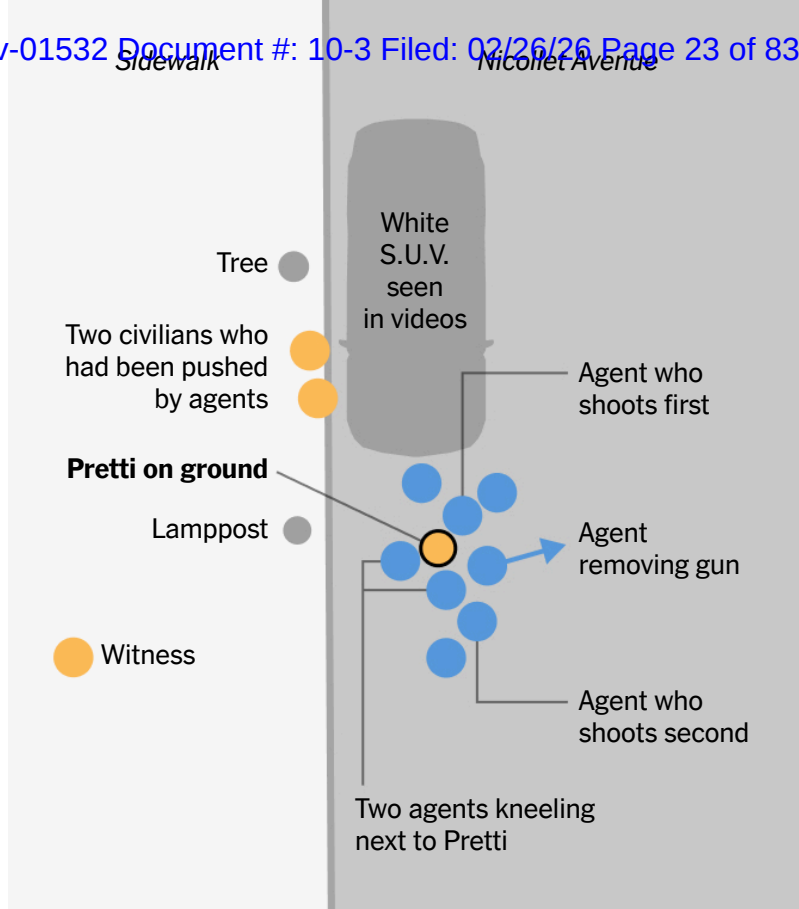
First shot fired



Still from witness video via Associated Press. The New York Times

The agent in the gray coat removes the weapon from the scene. It matches the profile of a gun that D.H.S. says belonged to Mr. Pretti. Then, while Mr. Pretti is on his knees and restrained, the agent standing directly above him appears to fire one shot at Mr. Pretti at close range. He immediately fires three additional shots.

The diagram below shows the position of the agents, Mr. Pretti and other civilians at this moment.



The New York Times

Additional shots fired



Still from video shared with The Times. The New York Times

Several agents have moved away from Mr. Pretti, who has collapsed. Another agent — the same one who shoved the civilians into the street and pepper-sprayed Mr. Pretti — unholsters his gun and fires at Mr. Pretti. The first agent also fires additional shots. Together, they fire six more shots at Mr. Pretti while he lies motionless on the ground.

At least 10 shots appear to have been fired within five seconds. By the moment of the 10th shot, the agent who moved away with the weapon has crossed the street.

Mr. Pretti is the second person to be shot and killed by a federal agent in Minnesota in recent weeks. Footage of Mr. Pretti's death in Minneapolis was posted on social media almost immediately after the shooting.

The Homeland Security Department said that the episode began after a man approached Border Patrol agents with a handgun, and that an agent fired "defensive shots." Another encounter in Minneapolis this month, in which a Venezuelan man was shot in the leg by a federal agent, was also characterized as "defensive" by the department.

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Gov. Tim Walz, Democrat of Minnesota, disputed the claims by federal officials that Mr. Pretti had posed a threat. He accused "the most powerful people in the federal government" of "spinning stories and putting up pictures."

Chief Brian O'Hara of the Minneapolis Police Department said that Mr. Pretti was an American citizen with no criminal record and that he had a valid firearms permit. Under Minnesota law, citizens can legally carry a handgun in public, either openly or concealed, if they have a permit.

authorities in Minnesota say that they have been impeded by D.H.S. from investigating the killing of Mr. Pretti, and that they have been cut off from access to crucial evidence and facts.

Large crowds of protesters gathered throughout Saturday at the site of Mr. Pretti's shooting. On Sunday afternoon, around 1,000 people packed Government Plaza in downtown Minneapolis to protest the presence of federal agents in the city and to call for justice for Ms. Good and Mr. Pretti.

Thomas Gibbons-Neff and Jazmine Ulloa contributed reporting.

EXHIBIT G

**Donald Trump in Concord, North Carolina on October 21, 2024
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT H



Watch CBS News

[Politics](#)

Tom Homan, President-elect Trump's border czar, says deportation plan will start in Chicago

By [Elyssa Kaufman](#), Noel Brennan, [Dana Kozlov](#), Steffanie Dupree

Updated on: December 11, 2024 / 7:15 AM CST / CBS Chicago

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CHICAGO (CBS) – The man President-elect Donald Trump picked as the new border czar appeared in Chicago Monday night—and made a bold promise.

[Tom Homan](#) was a guest at a holiday party hosted by the Law and Order PAC and the Northwest Side GOP Club.

"Chicago's in trouble because your mayor sucks and your governor sucks," said Homan.

Homan said President-elect Trump tapped him to run the biggest deportation operation the country has ever seen—and he said that operation will begin in Chicago right after President-elect Trump is inaugurated for his new term on Jan. 20.

Homan's opening line did not seem to open the door to collaboration. But minutes later, Homan Asked both Mayor Brandon Johnson and Gov. JB Pritzker to come to the table to help with the biggest deportation operation in U.S. history.

"We're going to start right here in Chicago, Illinois. If your Chicago mayor doesn't want to help, he can step aside," Homan told the crowd. "But if he impedes us—if he knowingly harbors or conceals an illegal alien—I will prosecute him."

Homan vowed agents from Immigration and Customs Enforcement will be in Chicago when President-elect Trump takes office.

"January 21st, you're going to look for a lot of ICE agents in your city looking for criminals and gang members," Homan said. "Count on it. It will happen."

Homan made the comments at the event Monday night at Biagio Events and Catering, 4242 N. Central Ave. Mayor Johnson has not issued a comment.

President-elect Trump's plans for mass deportations

U.S. Rep. Delia Ramirez (D-Illinois) addressed the proposed plans for mass deportations during an interview with CBS News Chicago's Dana Kozlov.

"What he's saying is invoking the same kind of fear that I have been seeing in (committee of) homeland security for the last two years," Ramirez said. "Of course, they are going to try to target communities that understand, like Chicago, that immigrants have contributed to our economy."

When asked about Trump's plans to end birthright citizenship, Ramirez said, "I would argue to say it's un-American ... it's absolutely unconstitutional."

Ramirez said she is prepared to fight, along with the mayor and governor, to protect communities on the city and state levels.

Ramirez said that with sanctuary city status in place, officials like herself are working to ensure the maintenance of constitutional practices.

"In the state of Illinois, we protect our immigrant communities," she said.

Claudia Marchan, executive director of Northern Illinois Justice for Our Neighbors, heard a message of fear and divisiveness from Homan.

"It's disheartening," she said.

Marchan wants to remind immigrants in Illinois of their constitutional rights—and of local laws that restrict how police can collaborate with ICE.

"Know your rights in your home, know your rights in the car, at work, in public spaces, right?" Marchan said. "We have to go through all of these steps to ensure that folks know, 'Hey, you are protected.'"

But some Chicago aldermen showed support for Homan's plan. Ald. Nicholas Sposato (38th) was in attendance for Homan's speech.

"Made it perfectly clear—they're going after the criminal element first," said Sposato. "They're not after dreamers. They're after the criminal element first."

Sposato even captured part of the speech on camera.

"And they're not too happy with our governor and our mayor about protecting these criminals, and they're going to work it from there," he said.

Ald. Ray Lopez (15th) said he met with Homan before the event—and shared a post about the meeting on X, formerly Twitter.

"He wants to work with the City of Chicago with law enforcement to identify just those specific individuals who are choosing to commit violent, dangerous crimes in our neighborhoods," Lopez said.

Homan said ICE enforcement will be targeted, and will begin on President-elect Trump's first full day back in office.

"If you're in the country illegally, you're not off the table," Homan said.

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Republicans condemn Trump's racist video portraying the Obamas as apes



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CBS MINNESOTA

Reports of ICE ruses add to fears in Minnesota



Less than 14% of those arrested by ICE in Trump's 1st year back in office had violent criminal records, documents show

The official DHS statistics, which had not been previously reported, provide the most detailed look yet into who ICE has arrested during the Trump administration's crackdown.

FACE THE NATION

Full transcript of "Face the Nation With Margaret Brennan," Feb. 8, 2026



In: [Tom Homan](#) [U.S.-Mexico Border](#) [Northwest Side](#)

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EXHIBIT I

Presidential Documents

Executive Order 14159 of January 20, 2025

Protecting the American People Against Invasion

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the Immigration and Nationality Act (INA) (8 U.S.C. 1101 *et seq.*) and section 301 of title 3, United States Code, it is hereby ordered:

Section 1. Purpose. Over the last 4 years, the prior administration invited, administered, and oversaw an unprecedented flood of illegal immigration into the United States. Millions of illegal aliens crossed our borders or were permitted to fly directly into the United States on commercial flights and allowed to settle in American communities, in violation of longstanding Federal laws.

Many of these aliens unlawfully within the United States present significant threats to national security and public safety, committing vile and heinous acts against innocent Americans. Others are engaged in hostile activities, including espionage, economic espionage, and preparations for terror-related activities. Many have abused the generosity of the American people, and their presence in the United States has cost taxpayers billions of dollars at the Federal, State, and local levels.

Enforcing our Nation's immigration laws is critically important to the national security and public safety of the United States. The American people deserve a Federal Government that puts their interests first and a Government that understands its sacred obligation to prioritize the safety, security, and financial and economic well-being of Americans.

This order ensures that the Federal Government protects the American people by faithfully executing the immigration laws of the United States.

Sec. 2. Policy. It is the policy of the United States to faithfully execute the immigration laws against all inadmissible and removable aliens, particularly those aliens who threaten the safety or security of the American people. Further, it is the policy of the United States to achieve the total and efficient enforcement of those laws, including through lawful incentives and detention capabilities.

Sec. 3. Faithful Execution of the Immigration Laws. In furtherance of the policies described in section 2 of this order:

(a) Executive Order 13993 of January 20, 2021 (Revision of Civil Immigration Enforcement Policies and Priorities), Executive Order 14010 of February 2, 2021 (Creating a Comprehensive Regional Framework To Address the Causes of Migration, To Manage Migration Throughout North and Central America, and To Provide Safe and Orderly Processing of Asylum Seekers at the United States Border), Executive Order 14011 of February 2, 2021 (Establishment of Interagency Task Force on the Reunification of Families), and Executive Order 14012 of February 2, 2021 (Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans) are hereby revoked; and

(b) Executive departments and agencies (agencies) shall take all appropriate action to promptly revoke all memoranda, guidance, or other policies based on the Executive Orders revoked in section 3(a) of this order and shall employ all lawful means to ensure the faithful execution of the immigration laws of the United States against all inadmissible and removable aliens.

Sec. 4. *Civil Enforcement Priorities.* The Secretary of Homeland Security shall take all appropriate action to enable the Director of U.S. Immigration and Customs Enforcement, the Commissioner of U.S. Customs and Border Protection, and the Director of U.S. Citizenship and Immigration Services to set priorities for their agencies that protect the public safety and national security interests of the American people, including by ensuring the successful enforcement of final orders of removal. Further, the Secretary of Homeland Security shall ensure that the primary mission of U.S. Immigration and Customs Enforcement's Homeland Security Investigations division is the enforcement of the provisions of the INA and other Federal laws related to the illegal entry and unlawful presence of aliens in the United States and the enforcement of the purposes of this order.

Sec. 5. *Criminal Enforcement Priorities.* The Attorney General, in coordination with the Secretary of State and the Secretary of Homeland Security, shall take all appropriate action to prioritize the prosecution of criminal offenses related to the unauthorized entry or continued unauthorized presence of aliens in the United States.

Sec. 6. *Federal Homeland Security Task Forces.* (a) The Attorney General and the Secretary of Homeland Security shall take all appropriate action to jointly establish Homeland Security Task Forces (HSTFs) in all States nationwide.

(b) The composition of each HSTF shall be subject to the direction of the Attorney General and the Secretary of Homeland Security, but shall include representation from any other Federal agencies with law enforcement officers, or agencies with the ability to provide logistics, intelligence, and operational support to the HSTFs, and shall also include representation from relevant State and local law enforcement agencies. The heads of all Federal agencies shall take all appropriate action to provide support to the Attorney General and the Secretary of Homeland Security to ensure that the HSTFs fulfill the objectives in subsection (c) of this section, and any other lawful purpose that fulfills the policy objectives of this order.

(c) The objective of each HSTF is to end the presence of criminal cartels, foreign gangs, and transnational criminal organizations throughout the United States, dismantle cross-border human smuggling and trafficking networks, end the scourge of human smuggling and trafficking, with a particular focus on such offenses involving children, and ensure the use of all available law enforcement tools to faithfully execute the immigration laws of the United States.

(d) The Attorney General and the Secretary of Homeland Security shall take all appropriate action to provide an operational command center to coordinate the activities of the HSTFs and provide such support as they may require, and shall also take all appropriate action to provide supervisory direction to their activities as may be required.

Sec. 7. *Identification of Unregistered Illegal Aliens.* The Secretary of Homeland Security, in coordination with the Secretary of State and the Attorney General, shall take all appropriate action to:

(a) Immediately announce and publicize information about the legal obligation of all previously unregistered aliens in the United States to comply with the requirements of part VII of subchapter II of chapter 12 of title 8, United States Code;

(b) Ensure that all previously unregistered aliens in the United States comply with the requirements of part VII of subchapter II of chapter 12 of title 8, United States Code; and

(c) Ensure that failure to comply with the legal obligations of part VII of subchapter II of chapter 12 of title 8, United States Code, is treated as a civil and criminal enforcement priority.

Sec. 8. *Civil Fines and Penalties.* (a) The Secretary of Homeland Security, in coordination with the Secretary of Treasury, shall take all appropriate action to ensure the assessment and collection of all fines and penalties

that the Secretary of Homeland Security is authorized by law to assess and collect from aliens unlawfully present in the United States, including aliens who unlawfully entered or unlawfully attempted to enter the United States, and from those who facilitate such aliens' presence in the United States.

(b) Within 90 days of the date of this order, the Secretary of the Treasury and the Secretary of Homeland Security shall submit a report to the President regarding their progress implementing the requirements of this section and recommending any additional actions that may need to be taken to achieve its objectives.

Sec. 9. *Efficient Removals of Recent Entrants and Other Aliens.* The Secretary of Homeland Security shall take all appropriate action, pursuant to section 235(b)(1)(A)(iii)(I) of the INA (8 U.S.C. 1225(b)(1)(A)(iii)(I)), to apply, in her sole and unreviewable discretion, the provisions of section 235(b)(1)(A)(i) and (ii) of the INA to the aliens designated under section 235(b)(1)(A)(iii)(II). Further, the Secretary of Homeland Security shall promptly take appropriate action to use all other provisions of the immigration laws or any other Federal law, including, but not limited to sections 238 and 240(d) of the INA (8 U.S.C. 1228 and 1229a(d)), to ensure the efficient and expedited removal of aliens from the United States.

Sec. 10. *Detention Facilities.* The Secretary of Homeland Security shall promptly take all appropriate action and allocate all legally available resources or establish contracts to construct, operate, control, or use facilities to detain removable aliens. The Secretary of Homeland Security, further, shall take all appropriate actions to ensure the detention of aliens apprehended for violations of immigration law pending the outcome of their removal proceedings or their removal from the country, to the extent permitted by law.

Sec. 11. *Federal-State Agreements.* To ensure State and local law enforcement agencies across the United States can assist with the protection of the American people, the Secretary of Homeland Security shall, to the maximum extent permitted by law, and with the consent of State or local officials as appropriate, take appropriate action, through agreements under section 287(g) of the INA (8 U.S.C. 1357(g)) or otherwise, to authorize State and local law enforcement officials, as the Secretary of Homeland Security determines are qualified and appropriate, to perform the functions of immigration officers in relation to the investigation, apprehension, or detention of aliens in the United States under the direction and the supervision of the Secretary of Homeland Security. Such authorization shall be in addition to, rather than in place of, Federal performance of these duties. To the extent permitted by law, the Secretary of Homeland Security may structure each agreement under section 287(g) of the INA (8 U.S.C. 1357(g)) in the manner that provides the most effective model for enforcing Federal immigration laws in that jurisdiction.

Sec. 12. *Encouraging Voluntary Compliance with the Law.* The Secretary of Homeland Security shall take all appropriate action, in coordination with the Secretary of State and the Attorney General, and subject to adequate safeguards, assurances, bonds, and any other lawful measure, to adopt policies and procedures to encourage aliens unlawfully in the United States to voluntarily depart as soon as possible, including through enhanced usage of the provisions of section 240B of the INA (8 U.S.C. 1229c), international agreements or assistance, or any other measures that encourage aliens unlawfully in the United States to depart as promptly as possible, including through removals of aliens as provided by section 250 of the INA (8 U.S.C. 1260).

Sec. 13. *Recalcitrant Countries.* The Secretary of State and the Secretary of Homeland Security shall take all appropriate action to:

(a) Cooperate and effectively implement, as appropriate, the sanctions provided by section 243(d) of the INA (8 U.S.C. 1253(d)), with the Secretary of State, to the maximum extent permitted by law, ensuring that diplomatic

efforts and negotiations with foreign states include the foreign states' acceptance of their nationals who are subject to removal from the United States; and

(b) Eliminate all documentary barriers, dilatory tactics, or other restrictions that prevent the prompt repatriation of aliens to any foreign state. Any failure or delay by a foreign state to verify the identity of a national of that state shall be considered in carrying out subsection (a) this section, and shall also be considered regarding the issuance of any other sanctions that may be available to the United States.

Sec. 14. *Visa Bonds.* The Secretary of Treasury shall take all appropriate action, in coordination with the Secretary of State and the Secretary of Homeland Security, to establish a system to facilitate the administration of all bonds that the Secretary of State or the Secretary of Homeland Security may lawfully require to administer the provisions of the INA.

Sec. 15. *Reestablishment of the VOICE Office and Addressing Victims of Crimes Committed by Removable Aliens.* The Secretary of Homeland Security shall direct the Director of U.S. Immigration and Customs Enforcement (ICE) to take all appropriate and lawful action to reestablish within ICE an office to provide proactive, timely, adequate, and professional services to victims of crimes committed by removable aliens, and those victims' family members. The Attorney General shall also ensure that the provisions of 18 U.S.C. 3771 are followed in all Federal prosecutions involving crimes committed by removable aliens.

Sec. 16. *Addressing Actions by the Previous Administration.* The Secretary of State, the Attorney General, and the Secretary of Homeland Security shall promptly take all appropriate action, consistent with law, to rescind the policy decisions of the previous administration that led to the increased or continued presence of illegal aliens in the United States, and align any and all departmental activities with the policies set out by this order and the immigration laws. Such action should include, but is not limited to:

(a) ensuring that the parole authority under section 212(d)(5) of the INA (8 U.S.C. 1182(d)(5)) is exercised on only a case-by-case basis in accordance with the plain language of the statute, and in all circumstances only when an individual alien demonstrates urgent humanitarian reasons or a significant public benefit derived from their particular continued presence in the United States arising from such parole;

(b) ensuring that designations of Temporary Protected Status are consistent with the provisions of section 244 of the INA (8 U.S.C. 1254a), and that such designations are appropriately limited in scope and made for only so long as may be necessary to fulfill the textual requirements of that statute; and

(c) ensuring that employment authorization is provided in a manner consistent with section 274A of the INA (8 U.S.C. 1324a), and that employment authorization is not provided to any unauthorized alien in the United States.

Sec. 17. *Sanctuary Jurisdictions.* The Attorney General and the Secretary of Homeland Security shall, to the maximum extent possible under law, evaluate and undertake any lawful actions to ensure that so-called "sanctuary" jurisdictions, which seek to interfere with the lawful exercise of Federal law enforcement operations, do not receive access to Federal funds. Further, the Attorney General and the Secretary of Homeland Security shall evaluate and undertake any other lawful actions, criminal or civil, that they deem warranted based on any such jurisdiction's practices that interfere with the enforcement of Federal law.

Sec. 18. *Information Sharing.* (a) The Secretary of Homeland Security shall promptly issue guidance to ensure maximum compliance by Department of Homeland Security personnel with the provisions of 8 U.S.C. 1373 and 8 U.S.C. 1644 and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law; and

(b) The Attorney General, the Secretary of Health and Human Services, and the Secretary of Homeland Security shall take all appropriate action to stop the trafficking and smuggling of alien children into the United States, including through the sharing of any information necessary to assist in the achievement of that objective.

Sec. 19. *Funding Review.* The Attorney General and the Secretary of Homeland Security shall:

(a) Immediately review and, if appropriate, audit all contracts, grants, or other agreements providing Federal funding to non-governmental organizations supporting or providing services, either directly or indirectly, to removable or illegal aliens, to ensure that such agreements conform to applicable law and are free of waste, fraud, and abuse, and that they do not promote or facilitate violations of our immigration laws;

(b) Pause distribution of all further funds pursuant to such agreements pending the results of the review in subsection (a) of this section;

(c) Terminate all such agreements determined to be in violation of law or to be sources of waste, fraud, or abuse and prohibit any such future agreements;

(d) Coordinate with the Director of the Office of Management and Budget to ensure that no funding for agreements described in subsection (c) of this section is included in any appropriations request for the Department of Justice or the Department of Homeland Security; and

(e) Initiate clawback or recoupment procedures, if appropriate, for any agreements described in subsection (c) of this section.

Sec. 20. *Denial of Public Benefits to Illegal Aliens.* The Director of the Office of Management and Budget shall take all appropriate action to ensure that all agencies identify and stop the provision of any public benefits to any illegal alien not authorized to receive them under the provisions of the INA or other relevant statutory provisions.

Sec. 21. *Hiring More Agents and Officers.* Subject to available appropriations, the Secretary of Homeland Security, through the Commissioner of U.S. Customs and Border Protection and the Director of U.S. Immigration and Customs Enforcement, shall take all appropriate action to significantly increase the number of agents and officers available to perform the duties of immigration officers.

Sec. 22. *Severability.* It is the policy of the United States to enforce this order to the maximum extent possible to advance the interests of the United States. Accordingly:

(a) If any provision of this order, or the application of any provision to any person or circumstance, is held to be invalid, the remainder of this order and the application of its other provisions to any other persons or circumstances shall not be affected thereby; and

(b) If any provision of this order, or the application of any provision to any person or circumstance, is held to be invalid because of the failure to follow certain procedures, the relevant executive branch officials shall implement those procedural requirements to conform with existing law and with any applicable court orders.

Sec. 23. *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect:

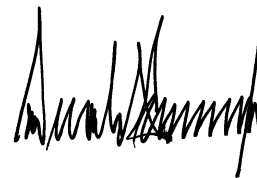
(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party

against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A handwritten signature in black ink, appearing to be a stylized name, possibly "Donald Trump", written in a cursive style.

THE WHITE HOUSE,
January 20, 2025.

[FR Doc. 2025-02006
Filed 1-28-25; 11:15 am]
Billing code 3395-F4-P

EXHIBIT J

U.S. Department of Homeland Security

Statement from a DHS Spokesperson on Directives Expanding Law Enforcement and Ending the Abuse of Humanitarian Parole

Release Date: January 21, 2025

WASHINGTON – Yesterday, Acting Department of Homeland Security Secretary Benjamine Huffman issued two directives essential to ending the invasion of the US southern border and empower law enforcement to protect Americans.

The first directive rescinds the Biden Administration’s guidelines for Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP) enforcement actions that thwart law enforcement in or near so-called “sensitive” areas. The second directive ends the broad abuse of humanitarian parole and returns the program to a case-by-case basis. ICE and CBP will phase out any parole programs that are not in accordance with the law. The following statement is attributable to a DHS Spokesperson:

“This action empowers the brave men and women in CBP and ICE to enforce our immigration laws and catch criminal aliens—including murders and rapists—who have illegally come into our country. Criminals will no longer be able to hide in America’s schools and churches to avoid arrest. The Trump Administration will not tie the hands of our brave law enforcement, and instead trusts them to use common sense.

“The Biden-Harris Administration abused the humanitarian parole program to indiscriminately allow 1.5 million migrants to enter our country. This was all stopped on day one of the Trump Administration. This action will return the humanitarian parole program to its original purpose of looking at migrants on a case-by-case basis.”

Topics

[BORDER SECURITY \(/TOPICS/BORDER-SECURITY\)](#) [IMMIGRATION AND CUSTOMS ENFORCEMENT \(/TOPICS/IMMIGRATION-AND-CUSTOMS-ENFORCEMENT\)](#)

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[IMMIGRATION AND CUSTOMS ENFORCEMENT \(ICE\) \(/KEYWORDS/IMMIGRATION-AND-CUSTOMS-ENFORCEMENT-ICE\)](#)

Last Updated: 03/21/2025

EXHIBIT K

**Trump's ICE teams already on the ground in cities like Chicago
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT L

(<https://www.wttw.com/>)

(/)

CRIME & LAW (/CRIME-LAW)

Immigration Raids Detained 100 People in Chicago Area, Top Cop Says, But He Doesn't Know How Many Have Criminal Records

[Heather Cherone \(/stories-by-author/heather-cherone\)](/stories-by-author/heather-cherone) | January 28, 2025, 2:31 pm



Chicago Police Supt. Larry Snelling addresses the news media on Tuesday, Jan. 28, 2025. (WTTW News)

Approximately 100 people have been detained by federal officials in the Chicago area as part of ramped-up immigration enforcement efforts ordered by President Donald Trump, but it is unclear how many of them had criminal records, Chicago Police Supt. Larry Snelling said Tuesday.

Snelling used his appearance alongside Mayor Brandon Johnson at City Hall to attempt to tamp down fears that undocumented immigrants will have their lives upended as Trump makes good on his promise to conduct the “largest domestic deportation operation in American history.”

“There is a level of fear out there that we have to bring down,” Snelling said, acknowledging that Trump’s return to office has prompted many Chicagoans to stop going to school and work because they fear being detained by federal agents.

Chicago’s Welcoming City ordinance and self-proclaimed status as a sanctuary city are designed to encourage undocumented immigrants to seek help from city officials for health care or protection from the Chicago Police Department without fear of exposing themselves or their families to deportation.

Despite Snelling’s attempt to reassure the tens of thousands of undocumented immigrants and their relatives who live in Chicago, Trump administration officials have repeatedly vowed to deport everyone who is in the United States without authorization, calling the act of crossing the United States’ border without permission a crime.

Federal officials on Jan. 21 lifted restrictions on two key federal immigration agencies — Immigration and Customs Enforcement and Customs and Border Protection — that prevented agents from carrying out deportation efforts at sensitive locations, including churches, schools, hospitals, shelters and community centers.

Tom Homan, the former acting director of U.S. Immigration and Customs Enforcement and Trump’s pick to serve as his “border czar,” has vowed to initially focus efforts to deport undocumented immigrants who have been convicted of serious crimes, but said undocumented immigrants who agents encounter will also be detained.

Bloomberg News reported (<https://www.bloomberg.com/news/features/2025-01-27/arrest-warrants-luck-inside-a-trump-deportation-raid-at-dawn>) that 260 people were targeted in the Chicago area on Sunday, although only seven had criminal arrest warrants. Snelling said he could not confirm that report.

The Chicago Sun-Times reported that one man apprehended by federal immigration agents had a 2005 felony conviction for drug possession, but had not been in trouble since, according to his daughter (<https://chicago.suntimes.com/immigration/2025/01/27/chicago-immigration-ice-raid-monday>).

Snelling said federal agents had told CPD leaders that they were targeting those with criminal records, and he said he had no reason to think they were targeting otherwise law-abiding undocumented immigrants attempting to work and raise their families in Chicago.

“What we have not seen is federal agents running through Chicago, looking for children, going to work locations and grabbing people,” Snelling said, decrying “misinformation” being spread by people he did not name.

U.S. Immigration and Customs Enforcement officials have released few details about who they were seeking and why those people had been targeted.

Homan told CNN on Monday that his agents would pursue “national security” or “public safety” threats into schools, hospitals and churches.

“We’ll go where we’ve got to go,” Homan said, after expressing frustration that efforts led by Chicago officials and immigration advocates to educate undocumented immigrants had made deportation efforts “very difficult.”

“For instance, Chicago (is) very well educated,” Homan said. “They call it ‘know your rights.’ I call it how to escape arrest, ... how to hide from ICE.”

Homan said he was willing to play a “cat and mouse game” until “every one of them gone.”

Johnson said repeatedly Tuesday that Trump was actively working to instill fear throughout Chicago, actions that Johnson called "unconscionable and abhorrent."

That effort will fail, Johnson said.

"Chicago is built different," Johnson said. "We are not going to be afraid."

Contact Heather Cherone: @HeatherCherone (https://twitter.com/heathercherone) / (773) 569-1863 | hcherone@wttw.com (mailto:hcherone@wttw.com)

TAGS

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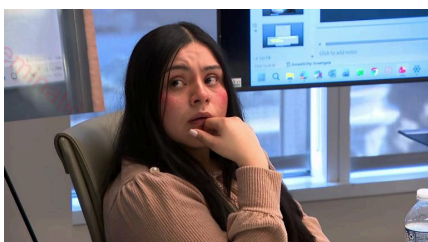
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Deadline to Vote in Chicago's Snowplow Naming Contest is Saturday; Will 'Abolish ICE' Win After Leading Nominations? (/2026/02/12/deadline-vote-chicago-s-annual-snowplow-naming-contest-saturday-will-abolish-ice-win)



(/2026/02/11/members-congress-odds-over-homeland-security-reform-funding-deadline-looms)

Members of Congress at Odds Over Homeland Security Reform as Funding Deadline Looms (/2026/02/11/members-congress-odds-over-homeland-security-reform-funding-deadline-looms)



(/2026/02/11/they-picked-



(/2026/02/08/cook-county-




(/2026/02/04/teen-brothers-

EXHIBIT M

Immigrant Communities in Hiding: ‘People Think ICE Is Everywhere’

Schools, churches and shops are feeling the chilling effect of the fear of deportation. One minister said fewer congregants were showing up for services.

 Listen to this article · 9:14 min [Learn more](#)



By Miriam Jordan, Hamed Aleaziz and Heather Knight

Miriam Jordan reported from Los Angeles, Hamed Aleaziz from Washington and Heather Knight from San Francisco.

Jan. 30, 2025

At a barbershop in Los Angeles, only one of the 10 chairs was occupied on what would ordinarily be a busy evening. In San Francisco, a middle school student’s erroneous information about seeing an immigration officer on a city bus prompted the school district to send parents a warning.

In Chicago, a mistaken report that immigration agents showed up at a school set off panic that rippled across the country. At a church in Charlotte, N.C., more than a third of the usual congregants were absent from a recent evening service.

Hotlines set up by advocates for immigrants to report enforcement activity have experienced a spike in calls.

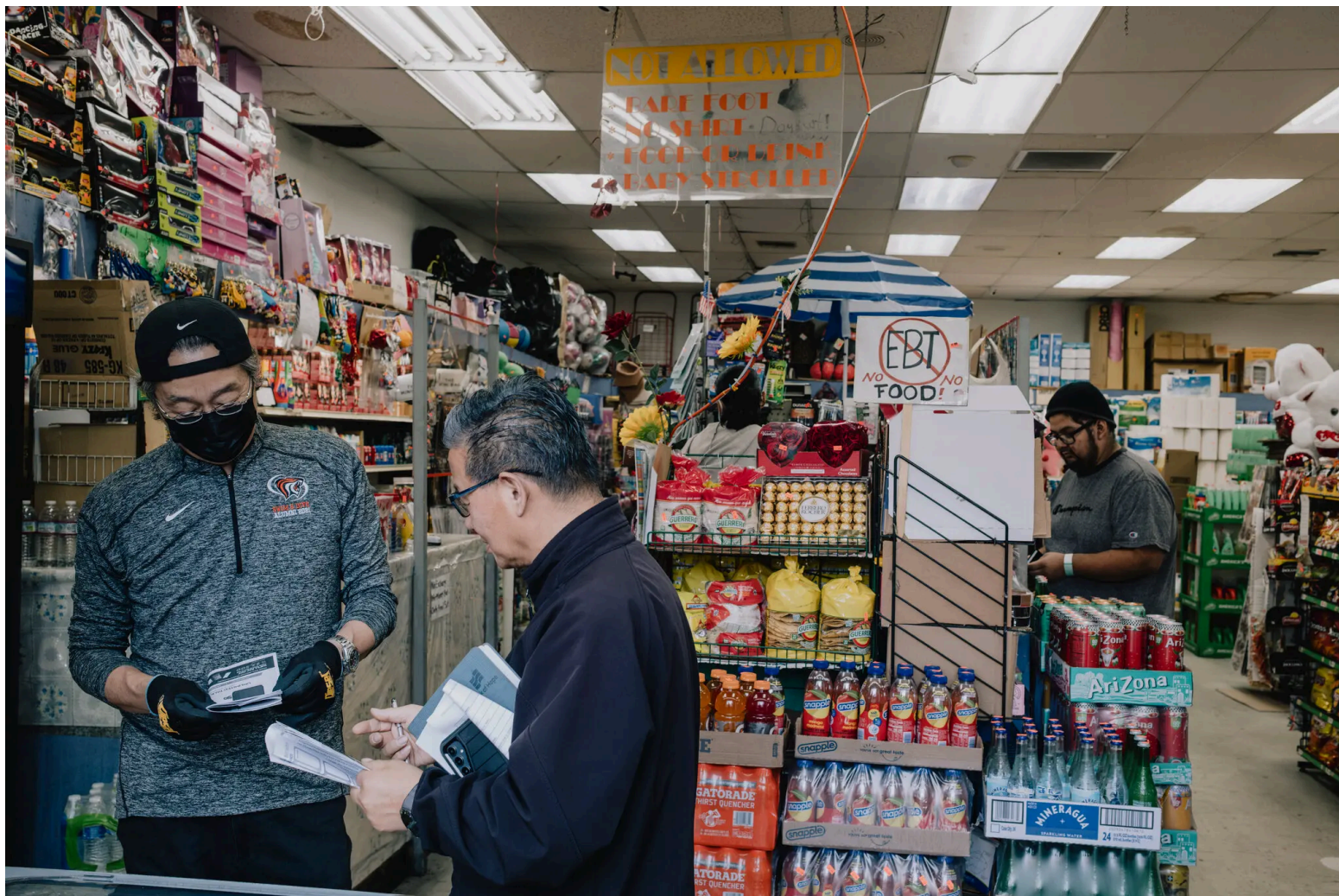
“The hysteria is out of control,” said Patrick Garcia, executive director of Embrace All Latino Voices, a group in Charlotte, N.C.

After taking office last week, the Trump administration began highlighting what it has characterized as a new and more aggressive effort to target illegal immigration and deliver on a key campaign pledge to carry out mass deportations. So far, the

enforcement efforts have been primarily individual arrests, rather than sweeps of factories, farms or other large-scale sites. Immigration and Customs Enforcement has reported on social media more than 5,000 arrests in around a week's time.

An estimated 14 million undocumented immigrants live in the United States, according to demographers and other experts. The number includes people with no legal status as well as people who have some form of temporary status that is being contested in court or has been threatened with termination by the Trump administration.

Arresting and deporting even a small share of the population with no status or contested status is all but impossible. But stirring anxiety and uncertainty among those millions of people appears to be far easier, stoked by sharp rhetoric from Mr. Trump and his top aides and fed by news footage of federal agents massing in communities from Seattle to New York.



“It hasn’t been as bad as this since Covid-19,” said James Kang, left, the owner of First Bargain, a grocery store in Los Angeles. “My customers are staying home.” Mark Abramson for The New York Times

Even schools, churches and hospitals, places long considered insulated from immigration enforcement, have become fair game after the Department of Homeland Security's recent announcement that such locations were not off limits to agents.

Denver Public Schools recorded a decline in attendance of 10 percent or more over the last week at some schools that have a large number of students from migrant families. An undocumented woman named Martha, 60, said she had stopped volunteering as a crossing guard and cafeteria worker at the school in her neighborhood in nearby Aurora, Colo., as raid rumors swirled. "My kids are grown up now, but they still need their mother by their side, and my biggest fear is that I will be picked up and taken away from them," she said.

Thomas D. Homan, Mr. Trump's border czar, said that allowing immigration agents to have access to sensitive sites gave them the ability to pursue targets wherever they want, in line with other law enforcement agencies.

"It's not like we're walking in and arresting everybody in the building, so the institution shouldn't be afraid. The criminal alien should be afraid," Mr. Homan said in an interview.

In San Francisco, Karen Rodriguez rushed to pick up her 7-year-old son from school after parents were notified by a worker there that ICE agents had been spotted in the area. "Fear is definitely a feeling we all have," said Ms. Rodriguez, a 30-year-old Colombian. She said that she, her husband and their son had crossed the border and were planning to apply for asylum.

Most undocumented immigrants have been in the country at least a decade. They work in large numbers in construction, agriculture and other sectors, and they often have children who were born in the United States. Many have felt that if they stayed out of trouble with the police, they would be relatively safe here.

No more.

Even in Los Angeles and San Francisco, cities that have passed laws to protect their immigrant communities, people are altering their routines.

At the Park Plaza Barber Shop in Los Angeles, there was only one customer at 5:15 p.m. on Tuesday. Ordinarily, most or all 10 chairs would be occupied, with more patrons waiting, said the owner, José Anguino. But in a neighborhood flush with immigrants, many were lying low, he said.



“Everyone is terrified, and they don’t want to spend money because they don’t know what could be coming,” said José Anguino, who owns Park Plaza Barber Shop in Los Angeles. Mark Abramson for The New York Times

“Everyone is terrified, and they don’t want to spend money because they don’t know what could be coming,” said Mr. Anguino, who has owned the business for three decades.

Next door, at First Bargain, which sells an array of Mexican foods, just a handful of customers roamed the aisles. Sales have dropped about 30 percent since last week, said James Kang, the owner of the supermarket.

“It hasn’t been as bad as this since Covid-19,” he said. “My customers are staying home.”

Across the country, in Charlotte, N.C., Apolo Santos, the pastor of an Assembly of God Church, which ministers to the area’s fast-growing Brazilian community, said that his congregants were scared when President Trump was last in office, “but not with this intensity.”

“People think ICE is everywhere,” he said, which is hurting church attendance.

“Stay alert if you’re heading toward Gastonia,” said a message in Portuguese in a WhatsApp group on Wednesday, relaying a supposed sighting on a road to that North Carolina town.

And Mr. Garcia, of Embrace All Latino Voices, the advocacy group, said that some people were starting to talk about returning to their home countries.

Self-deportation, or the idea that undocumented people will just leave, has been promoted by proponents of highly restrictive immigration policies to achieve attrition through enforcement.

Indeed, Mr. Homan, the border czar, said he hoped people would decide to abandon the country.

“It’d be wiser for people that are in the country illegally to simply go home and come back the right way. Absolutely,” he said.

John Sandweg, a senior Homeland Security official in the Obama administration, said the strategy was clear. “The administration is creating a climate of fear as part of a self-deportation plan,” he said.

Details about the arrests have been extremely limited, making it difficult to assess the extent to which the recent operations have been more expansive than the day-to-day enforcement efforts by ICE.

To calm nerves and debunk misinformation on TikTok, other social media platforms and in tabloids, the consulate of Mexico in Los Angeles, home to the largest Mexican population in the United States, released a video this week.

“We see no evidence of massive raids, of people arrested randomly in the streets or of operations in churches or schools,” Carlos González Gutiérrez, the consul general, said in the two-minute video posted on Facebook, Instagram and X.



Agents detaining two immigrants at a Home Depot parking lot in Tucson, Ariz., earlier this week. Rebecca Noble/Reuters

He explained that 17 Mexican men who had “prior history with law enforcement” had been detained last weekend, a number that is not atypical.

“For now, there is no reason for you to refrain from your usual activities,” Mr. Gutiérrez said.

Yet the specter of federal agents and the spigot of rumors on social media have created anxiety that can be hard to allay. The erroneous report by a middle school student in San Francisco of seeing an ICE agent on a public bus took on a life of its own.

A screen shot of a text message sent by a social worker at the school to colleagues said ICE agents “were in a black car, had dogs and entered the 29 bus. They introduced themselves as ICE. Then, they questioned passengers and detained several adults and school-age children.”

An Instagram post by a popular local photographer included a similar account that was shared more than 9,000 times. The school district sent an email to families warning them that agents might be in the vicinity of the bus route.

But there was no ICE action on any bus that day, according to the city’s police chief, William Scott, who said he had confirmed that with Homeland Security. He said the student most likely saw police officers board the same bus to look for a lost child and mistook them for ICE agents.

The next day, a rumor spread that ICE agents had entered five downtown office buildings searching for janitors to deport. That, too, was shared widely on social media. Hundreds of janitors failed to report for their shifts that night, according to Olga Miranda, president of the local janitors’ union.

It turned out that the agents were in two of those buildings with an arrest warrant and were not targeting janitors, she said.

Lorena Melgarejo, who takes calls on a hotline for Faith in Action Bay Area, a social justice group in Northern California, said that there have been “ghost sightings” of ICE agents everywhere.

“There are so many that it’s almost impossible to follow them,” she said.

She has been telling people to call immediately if they witness a raid firsthand, but otherwise to double-check first. Her advice is that people remain vigilant while keeping up their routines — attending doctor’s appointments, sending children to school and

showing up for work.

“We cannot be frozen by fear already,” she said. “It’s only been days!”

Tim Arango contributed reporting from Denver.

Miriam Jordan reports from a grass roots perspective on immigrants and their impact on the demographics, society and economy of the United States.

Hamed Aleaziz covers the Department of Homeland Security and immigration policy.

Heather Knight is a reporter in San Francisco, leading The Times’s coverage of the Bay Area and Northern California.

A version of this article appears in print on , Section A, Page 14 of the New York edition with the headline: Frantic Rumors of ICE Raids Send Immigrant Communities Into Hiding

EXHIBIT N

**Fear of ICE raids impacting Chicago neighborhood
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT O

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IMMIGRATION CHICAGO ILLINOIS

In Trump's first week as president, angst over deportation threats rises

Chicago-area residents remain vigilant as false sightings of ICE were rumored from the Loop to suburban workplaces.

By Adriana Cardona-Maguigad | WBEZ and Elvia Malagón | Jan 25, 2025, 6:30am EST



Hundreds march to Trump Tower in the Loop to protest President Donald Trump's position on issues including immigration, the Israel-Hamas war, women's

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In the days since Donald Trump was sworn in for his second presidential term, Riccy, an immigrant from Honduras who has lived in Chicago seven years, has found herself checking her surroundings for the possibility of immigration officials.

The mother of four says she worries about what could happen to her family. She has written a document in case she's separated from her children, and she wants to get it notarized.

Despite her worries, Riccy has been among those who have spoken out even as Trump issued executive orders this week to further curtail immigration. She joined a group of labor advocates days after the inauguration in the basement of Centro de Trabajadores Unidos' building on the East Side to rally support for immigrant workers.

"I get strength from my community to raise my voice," Riccy says, "so that everyone knows about the rights that we do have and to know we aren't alone."

Threats of mass deportations did not materialize in the Chicago area, but people have remained vigilant as false sightings of U.S. Immigration and Customs Enforcement agents were rumored from the Loop to suburban workplaces.

ICE did not comment Friday on whether anyone had been detained.

Aside from the ongoing threats, a blitz of immigration policies about where ICE can detain people and about ending humanitarian parole programs is keeping many immigrants on edge wondering how those policies will affect them.

Marchers head to Trump Tower on Monday to protest Donald Trump's policies on immigration and other issues. | Ashlee Rezin/Sun-Times

Threats in 'safe' spaces

The uncertainty and anxiety about where and when Trump's deportations could take place keeps growing. As Trump [clears the way](#) for allowing immigration arrests in sensitive locations including schools, Chicago Public Schools teachers and religious leaders are preparing to protect students and parishioners.

CPS issued a letter to parents reminding them of a district policy that forbids federal agents from [entering schools or accessing student records](#) without a judicial warrant.

"Our District is fully committed to protecting the right all students have to a free public education, regardless of their immigration status or the immigration status of their family," CPS CEO Pedro Martinez said. The letter said CPS doesn't allow immigration agents inside schools unless they have a warrant signed by a federal judge. Martinez also assured that the district won't share student records with immigration officials unless there is a court order or consent from the parent or guardian.

The letter reminds parents and teachers about two local laws that prohibit collaboration between police and federal immigration officials — the Illinois Trust Act at the state level and

But experts — like Fred Tsao, senior policy counsel with the Illinois Coalition for Immigrants and Refugee Rights — warn that suburban schools aren't protected by Illinois law and are urging school district leaders to enact policies similar to those of CPS.

“All that the Trust Act does is say that local police cannot assist with such operations or provide information to facilitate such operations unless ICE agents have a warrant sworn out by a judge.” Tsao says. “There's no formal block restraining immigration enforcement activities at these specific locations. If ICE agents see fit to try to apprehend somebody at a school, they can do so.”

But Tsao also said Illinois doesn't have laws preventing school districts or individual schools from creating such policies, and it's up to each individual school or school district to adopt policies similar to CPS or go the opposite direction — “and collaborate with ICE [agents] if they show up,” Tsao says.

The Illinois State Board of Education recently [released guidelines](#) and reminded the public that schools do not collect citizenship status information of students and parents.

State Education Superintendent Tony Sanders says the state board believes schools should “be a safe haven for all students, where students should be able to learn without fear.”

Churches, which historically have been at the center of sanctuary movements in Chicago and across the country, also face the threat of ICE officials entering the religious spaces to detain immigrants.

The Rev. Beth Brown, of the Lincoln Park Presbyterian Church, says she has spent the first days of Trump's presidency ensuring that other leaders know there are still protections for places of worship.

“The law is that ICE cannot enter our buildings when our doors are locked, unless they have a signed judicial warrant,” Brown says.

The church becomes a public space when it opens its doors to the public for worship services, but religious leaders believe rooms with signs stating “do not enter,” “private” or “employees only” may be places that ICE couldn't access, Brown says.

Churches around Chicago are also putting up signs stating that they do not consent to ICE agents entering the religious spaces.

Protesters march in downtown Chicago on Inauguration Day. | Ashlee Rezin/Sun-Times

Trump expands who ICE targets

Trump and his border czar, Tom Homan, have vowed to start the mass deportations by going after immigrants with a criminal record. Some advocates say these threats have created confusion and uncertainty about how the new administration might target immigrants without legal status who also have low-level offenses on their record.

“I have a DUI from 13 years ago, which has criminalized me,” says Antonio Gutierrez, part of Organized Communities Against Deportations, adding that he just got a driver’s license after paying more than \$3,000 in fines and classes.

Gutierrez says he made a mistake, he learned from it and he is now a law-abiding resident. But he still has fears. “I’m actually a big threat or a big target because of [my] that criminal record.”

He knows the Welcoming City ordinance prohibits the sharing of information about an individual’s status and any record involving nonviolent crimes between police and ICE agents, but he and other advocates fear a new bill in Congress known as the [Laken Riley Act](#) could further criminalize immigrants with low-level offenses often associated with living in poverty.

Case: 1:26-cv-01532 Document # 10-3 Filed 02/26/26 Page 63 of 88 Page ID #:145
This measure, which allows federal immigration officials to detain and deport people without legal status who are charged with minor theft or shoplifting, passed the Senate and the House with the support of Democrats.

“If the person is deportable already for not having lawful status, that person would be vulnerable,” says Hena Mansori, attorney supervisor with the Immigration Division at the Cook County Public Defender. “Even one shoplifting arrest, even if the state doesn’t think it’s serious enough to charge you, [it] would require ICE to detain you and place you in removal proceedings.”

Private vs. public spaces

As stories spread about potential sightings of immigration officials, advocates distinguish between the spaces ICE agents could enter and those they could be prohibited from entering without a warrant signed by a judge.

Esmeralda Limón, an attorney with Raise the Floor, said during a news conference that they are making sure workers know that there are limits to areas ICE can access even in workplaces.

She says there is a difference between being in a public and a private space.

Limón used the example of a restaurant, explaining that immigration officials could go into areas where customers are eating because that would be considered a public space, but agents wouldn’t be allowed to enter private areas such as kitchens or employee backrooms unless they have a warrant signed by a judge.

If ICE agents want to go inside a private space like a home, Limón says it’s important to ask if they have a judicial warrant and to read it closely. “It’s important to pay attention to the details of the warrant. Sometimes it doesn’t have the correct date, or it can list a couple of names, and you may not even be the name on that warrant.”

Ana Guajardo, the executive director of Centro de Trabajadores Unidos, says ICE agents must have the specific names of workers they are there to detain if they enter a workplace. The Chicago-based labor organization has been doing “know your rights” training for schools and employers.

“Centro de Trabajadores Unidos is going to be a safe space for our community; we are not going to cooperate with any ICE activities,” Guajardo says.

Legal defense

Case: 1:26-cv-01532 Document # 10-3 Filed 02/26/26 Page 64 of 83 PageID #: 146
Local attorneys have been discussing how immigration policy under Trump could affect residents without legal status. They are preparing advocates with the legal tools necessary to defend immigrants at risk of deportation.

Mansori says Illinois county jails and prisons aren't allowed to hold immigrants for ICE. But it doesn't mean ICE won't arrest people by waiting outside these facilities or by conducting random raids in public areas. She also says ICE still can access people's private information through other federal databases including the Federal Bureau of Investigations and the Department of Homeland Security.

And in many cases, ICE agents will try different ways to get into private property.

"They will often try to get people to open the door and say, 'Hey, we're the police...or, hey, I'm your parole officer. Need to talk to you,'" Mansori says. "They will basically say whatever they can to get that person to open up and let them in."

Though the detention process could change under Trump, typically, Mansori says, once detained, immigrants are taken to a processing center in Broadview. Immigrants without pending criminal records are released under bond. Those already with a deportation order or a violent criminal record aren't allowed to see a judge and are transferred to ICE custody in surrounding states including Indiana or Wisconsin.

Mansori said she has been working with other public defenders who don't understand immigration law so that they can understand what risks their clients face, even when they still have pending charges. But she says it's important for people to know that while immigrants are protected under sanctuary laws in Chicago and Illinois, they are not immune to immigration enforcement.

"Particularly any involvement with the criminal justice system, even for something minor, may certainly increase that person's chance of ICE enforcement," she says.

Contributing: Sophie Sherry, Anna Savchenko



Adriana Cardona-Maguigad | WBEZ

WBEZ • Immigration reporter

EXHIBIT P

Democracy Dies in Darkness

Immigration

Trump officials issue quotas to ICE officers to ramp up arrests

The administration wants to increase the number of arrests from a few hundred per day to at least 1,200 to 1,500, increasing the chances that non-criminals will be detained.

Updated January 26, 2025 More than **1 year ago**

By [Nick Miroff](#) and [Maria Sacchetti](#)

U.S. Immigration and Customs Enforcement officials have been directed by Trump officials to aggressively ramp up the number of people they arrest, from a few hundred per day to at least 1,200 to 1,500, because the president has been disappointed with the results of his mass deportation campaign so far, according to four people with knowledge of the briefings.

The quotas were outlined Saturday in a call with senior ICE officials, who were told that each of the agency's field offices should make 75 arrests per day and managers would be held accountable for missing those targets. The four people spoke on the condition of anonymity to disclose internal briefings.

The orders significantly increase the chance that officers will engage in more indiscriminate enforcement tactics or face accusations of civil rights violations as they strain to meet quotas, according to current and former ICE officials.



Podcast episode

Trump's deportation campaign has begun

The Trump administration's plan to rapidly ramp up deportations.

said for weeks that ICE would not conduct mass roundups and its officers would prioritize immigrants with criminal records and who are gang members. But the quotas issued this weekend would place ICE officers under more pressure to seize a wider range of potential deportees to avoid reprimand, including immigrants who have not committed crimes.

Neither ICE nor Homan responded to requests for comment. After an earlier version of this article was published, White House press secretary Karoline Leavitt said in an email that, “your story is false,” but did not reply when asked for specifics.

Homan told ABC News in an [interview broadcast Sunday](#) that the administration is “in the beginning stages” of its [mass deportation plan](#), and while public safety threats and national security threats are a priority, “as that aperture opens, there’ll be more arrests nationwide.”

ICE announced in a statement Sunday that agents “began conducting enhanced targeted operations today in Chicago,” with help from other federal agencies, including the FBI. Acting Homeland Security secretary Benjamine C. Huffman last week [revoked](#) a directive that had essentially barred ICE from arresting immigrants in or around sensitive areas such as [schools](#), hospitals and churches.

Later Sunday, Homan appeared on a streaming service with Phil McGraw, the [television doctor known as Dr. Phil](#), to emphasize that ICE is searching for specific immigrants who have committed crimes.

“Sweeps don’t occur anywhere,” Homan told McGraw, whose [MeritTV](#) said they were inside the ICE Command Center in Chicago.

ICE increasingly targets undocumented migrants with no criminal record

The Trump administration is [increasingly targeting unauthorized immigrants with no criminal record](#) as it ramps up arrests, a Washington Post analysis of U.S. Immigration and Customs Enforcement data shows.

An ICE official who was not authorized to discuss the quota said the agency’s list of criminal suspects was sufficiently long, so officers would be able to continue prioritizing public safety and national security threats to meet quotas.

Last year, ICE told lawmakers there were about 670,000 immigrants on its caseload who had criminal convictions or faced criminal charges. Some are serving sentences in jails and prisons.

“Quotas will incentivize ICE officers to arrest the easiest people to arrest, rather than the people that are dangerous noncitizens,” said Hunker, who, as the agency’s chief counsel in Dallas, oversaw offices in North Texas and Oklahoma from 2003 through January 2024.

“I’ve just never heard of that,” he said, referring to the quotas.

The agency manages a docket of about 7.8 million people who potentially face deportation, but many of them have pending claims in the U.S. immigration system or a form of provisional residency status. ICE’s caseload more than doubled during Joe Biden’s presidency amid record numbers of illegal border crossings.

ICE officers deployed aggressively during President Donald Trump’s first week in office, boosting the number of immigrants taken into custody from fewer than 400 on Tuesday to nearly 600 on Friday. The number declined to 286 on Saturday, according to ICE.

Trump’s supporters and others have pointed out that those totals will not yield the “millions” of deportations the president has promised.

Trump made a similar promise during his first term and came up far short, reaching a peak of about 267,000 during the 2019 fiscal year. The Biden administration deported 271,000 in fiscal year 2024, the highest annual total in a decade. Trump has long had little patience for explanations of why his goals are not realistic.

ICE officers have been told for years that indiscriminate roundups are unsafe and counterproductive, because they spread panic throughout immigrant communities and produce significant public backlash. ICE and the White House did not immediately respond to requests for comment.

Trump officials have told ICE the president expects arrest operations to proceed around-the-clock and that officers should cancel personal leave, according to the four people briefed on the directives.

ICE has about 5,500 officers nationwide working on immigration enforcement, a staffing level that has remained roughly flat for the past decade. The Trump administration took steps to supplement those numbers by deputizing officers and agents at the Justice Department to investigate immigration violations and make arrests, enlisting personnel from the FBI, U.S. Marshals, the Drug Enforcement Administration, the Bureau of Alcohol, Tobacco, Firearms and Explosives and the Federal Bureau of Prisons.

Trump presidency

legal challenges to his executive orders and actions.

Trump also ordered ICE's Homeland Security Investigations division to shift its focus to immigration enforcement. The agency is DHS's investigative division for counterterrorism, drug smuggling, human trafficking cases, child exploitation and other crimes.

"Mobilizing these law enforcement officials will help fulfill President Trump's promise to the American people to carry out mass deportations," Huffman said in a statement. "For decades, efforts to find and apprehend illegal aliens have not been given proper resources. This is a major step in fixing that problem."

Former ICE officials, speaking on the condition of anonymity to describe the work of Homeland Security Investigations, said reassigning special agents to carry out civil immigration enforcement will mean they devote less time to probing serious crimes.

EXHIBIT Q




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ICE NEWSROOM

JANUARY 26, 2025 • WASHINGTON, DC • STATEMENT

Statement by US Immigration and Customs Enforcement

U.S. Immigration and Customs Enforcement, along with federal partners, including the FBI, ATF, DEA, CBP and the U.S. Marshals Service, began conducting enhanced targeted operations today in Chicago to enforce U.S. immigration law and preserve public safety and national security by keeping potentially dangerous criminal aliens out of our communities.

Updated: 01/27/2025

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For media inquiries about ICE activities, operations, or policies, contact the ICE Office of Public Affairs at ICEMedia@ice.dhs.gov.

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EXHIBIT R

U.S. Department of Homeland Security

ICE Launches Operation Midway Blitz in Honor of Katie Abraham to Target Criminal Illegal Aliens Terrorizing Americans in Sanctuary Illinois

Release Date: September 8, 2025

Thanks to Governor Pritzker's sanctuary policies, TdA gang members, rapists, kidnappers, and drug traffickers are being released onto Chicago's streets

CHICAGO – Today, the Department of Homeland Security announced Operation Midway Blitz in honor of [Katie Abraham](https://www.youtube.com/watch?v=xqwTezzPDx0) (<https://www.youtube.com/watch?v=xqwTezzPDx0>), who was killed in a drunk driving hit-and-run car wreck caused by criminal illegal alien Julio Cucul-Bol in Illinois. This ICE operation will target the criminal illegal aliens who flocked to Chicago and Illinois because they knew Governor Pritzker and his sanctuary policies would protect them and allow them to roam free on American streets.



*"DHS is launching Operation Midway Blitz in honor of Katie Abraham who was killed in Illinois by a criminal illegal alien who should have never been in our country. This operation will target the worst of the worst criminal illegal aliens in Chicago," said **Assistant Secretary Tricia McLaughlin**. "For years, Governor Pritzker and his fellow sanctuary politicians released Tren de Aragua gang members, rapists, kidnappers, and drug traffickers on Chicago's streets—putting American lives at risk and making Chicago a magnet for criminals. President Trump and Secretary Noem have a clear message: no city is a safe haven for criminal illegal aliens. If you come to our country illegally and break our laws, we will hunt you down, arrest you, deport you, and you will never return."*

Below are just a handful of the worst of the worst criminal illegal aliens—including gang members, drug traffickers, kidnappers, and rapists—who were **RELEASED** back on to Illinois streets because of Governor Pritzker's sanctuary policies. These criminal illegal aliens remain at large.



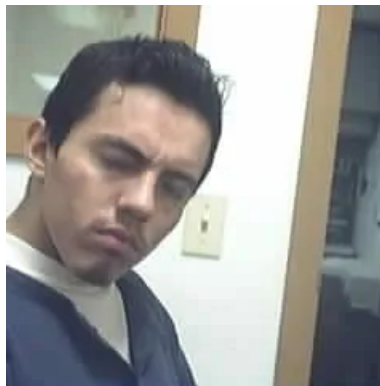
Gabriel J Valle Galvez, a 47-year-old criminal illegal alien from Mexico, with convictions for **battery, aggravated assault, DUI, trespassing, criminal damage to property, public indecency, violation of order of protection, and multiple assaults**. Valle Galvez has been identified as a **Latin King gang member**. ICE lodged arrest detainers twelve separate times. Each time Cook County Jail did not honor the detainer and released him.



Javier Carmelo Casillas Gomez, a 46-year-old criminal illegal alien from Mexico, with convictions for **procuring prostitution, domestic violence/assault, drug possession, and an active warrant for drug manufacturing**. ICE lodged an arrest detainer, with Cook County Jail.



Victor Manuel Gomez-Atilano, a 45-year-old criminal illegal alien from Mexico, with prior deportations and convictions for **aggravated unlawful use of a weapon**. ICE lodged an arrest detainer with the Illinois Department of Corrections. He was released despite the ICE arrest detainer.



Ricardo Salas Muro, a 41-year-old criminal illegal alien from Mexico with convictions for **burglary and drug possession**. He was released multiple times despite ICE detainers lodged by ICE Chicago.



Dany Daniel Hernandez Colina, a 27-year-old criminal illegal alien from Venezuela and **Tren de Aragua gang member** with repeat arrests **for burglary and shoplifting**. An immigration judge issued an order of removal for Colina in 2024, but he was released after Cook County Jail failed to honor the ICE detainer.



Carlos Johendy Gonzales Montero, a 36-year-old criminal illegal alien from Venezuela and **Tren de Aragua gang member** with charges for **reckless conduct, aggravated assault with a weapon, and armed violence**. This gang member was released after Cook County Jail ignored ICE detainers.



Oscar Ramirez Vences, a 30-year-old criminal illegal alien from Mexico and **member of the Two Six gang** with convictions for **aggravated unlawful use of a weapon and domestic battery**. Cook County Jail did not honor the ICE detainer and released him.





Rutilo Uriostegui Mojica, a 28-year-old criminal illegal alien from Mexico, with convictions for **illegal reentry, drug possession, and multiple DUIs** was released despite an ICE detainer.



Pedro Enrique Colmenares Gonzalez, a 34-year-old criminal illegal alien from Venezuela and **Tren De Aragua gangmember** with a past criminal history of **aggravated unlawful use of a weapon, sexual assault, domestic battery, and kidnapping**. He was released multiple times despite ICE lodging a detainer.



Abdul Raza Al Kaby, a 60-year-old criminal illegal alien from Iraq, with convictions for **felonious assault, assault with a deadly weapon, and murder/intent to kill**. Al Kaby had an order for removal by an immigration judge in 1997 but was repeatedly released from Illinois jails despite ICE detainers.

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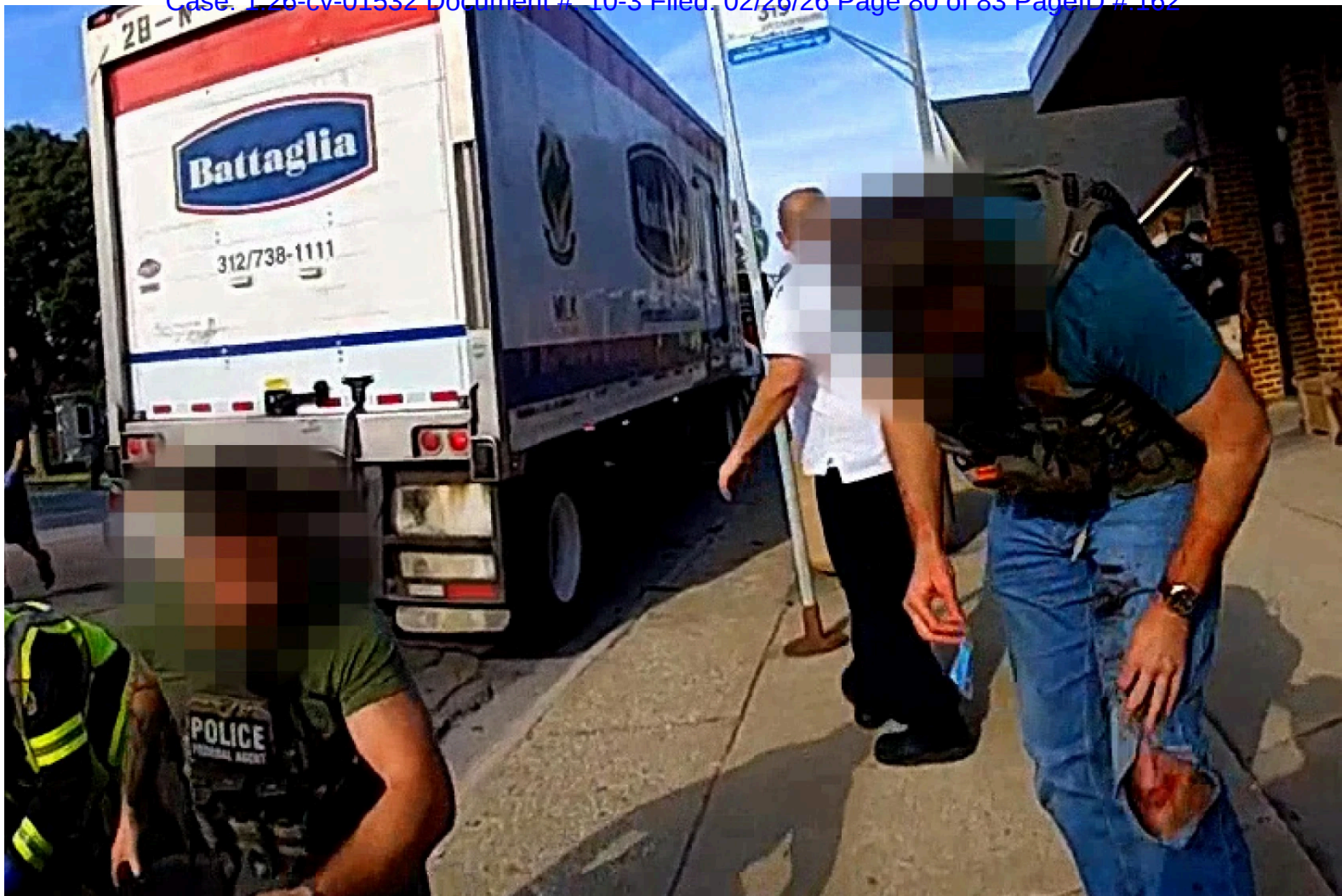


THE WATCHDOGS ILLINOIS IMMIGRATION

ICE officer said his injuries were 'nothing major' after deadly shooting near Chicago, video shows

The immigration agent's partner said he suffered a "knee injury" and "some lacerations to his hands," according to police body camera footage obtained by the Chicago Sun-Times. But the feds reported he was "seriously injured" before he fatally shot Silverio Villegas González.

By Tom Schuba and Nader Issa | Sept 22, 2025, 11:51pm EST



A screenshot from a Franklin Park police bodycam shows the aftermath after Silverio Villegas González was killed by ICE agents during an immigration arrest Sept. 12. The faces of the agents, whose names haven't been released, have been blurred. | Village of Franklin Park

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As two federal agents tried to revive a Mexican immigrant who was dying from gunshot wounds, one of them sought to explain the shooting.

“He tried to run us over,” the U.S. Immigration and Customs Enforcement officer said in body camera footage captured by a Franklin Park cop arriving at the northwest suburban shooting scene Sept. 12.

Video obtained by the Chicago Sun-Times shows the blue jeans of the other federal agent were left bloodied and torn, and he told local police that he was “dragged a little bit.”

ICE officer said his injuries were 'nothing major' after deadly shooting near Chicag...



A short time later, [Silverio Villegas González's body](#) was moved from the street and into an ambulance by a group of firefighters and paramedics. He was later pronounced dead at Loyola University Medical Center in Maywood, records show.

Speaking over a radio, the federal agent who told police that Villegas González tried to use his car as a weapon said his partner had suffered “a left knee injury and some lacerations to his hands.”

“Nothing major,” the injured agent said.

“Nothing major,” his partner echoed.

Shortly after the shooting, the U.S. Department of Homeland Security reported the agent “sustained multiple injuries” and was “seriously injured” when he was “dragged a significant distance” by Villegas González’s car as he fled a traffic stop. DHS officials said the agent had opened fire, fearing for his life.

The injured agent was eventually taken to a second ambulance, and his partner said he was going to follow behind, video shows. DHS said his condition was soon stabilized.

“I think we’re good, man,” the second agent said as he began to drive off. “Just shaken up a little.”

As streets were blocked off and nearby schools were placed on lockdown after the shooting, news crews and protesters gathered behind police tape nearby.

Demonstrators banged drums and chanted, while a member of the media asked Franklin Park Police Director Michael Witz if police would be fielding questions.

At one point, Witz explained to his officers that local cops wouldn't be investigating the shooting. "It's a federal shooting, you're not going to investigate a federal officer," Witz says.

DHS spokesperson Tricia McLaughlin said protocol calls for the "appropriate investigative agency" to initially review ICE shootings. But she didn't answer questions about the body camera videos or say which agency is investigating the Franklin Park shooting, apparently the first by an on-duty ICE official since President Donald Trump returned to the White House in January.

After another agency's probe, ICE will follow up and review "every use of force incident and any discharge of an ICE firearm," she said.

Dawn Catanzaro, a Franklin Park spokesperson, previously said "the FBI Chicago field office is in charge of the investigation," referring questions to that agency. An FBI spokesperson previously said the agency responded to the shooting and assisted law enforcement on the scene, but wouldn't comment on involvement in an ongoing investigation.

The body camera videos, obtained from Franklin Park police through a public records request, offer the most revelatory look yet at the aftermath of the shooting, which has drawn national attention and continued scrutiny.

The videos raise new questions about the narrative put forth by DHS, which is leading an ongoing deportation campaign in the Chicago area that has stoked fears and sparked protests.

This is a developing story. The agents involved have not been publicly identified, and no official action or complaint against the officers involved has been made public. Based on currently available information, the Chicago Sun-Times is blurring the faces of the ICE agents in the video and images. The Sun-Times is continuing to report on this incident. *Updated Sept. 23, 2025.*

The driver of the truck that was struck by Villegas González's car told police that Villegas González reversed when the federal agents cut him off and tried to take him into custody, video shows. The truck driver said he assumed that Villegas González was shot before the collision, and he recalled hearing at least one gunshot.

“I don’t know if they shot him before and that’s why he crashed into me,” the driver told Franklin Park officers. “Because there should have been no reason for him to crash into me, he could’ve just gone to the left.”

Doubts have been cast on ICE’s narrative of the traffic stop that started the encounter. A witness said he was driving past as Villegas González’s sedan swerved into the semitractor-trailer and two agents approached the crash, but the witness said he didn’t see Villegas González dragging one of the agents behind his car.

Meanwhile, the feds have largely been silent on the incident since it happened, [drawing criticism from Gov. JB Pritzker](#) for a lack of transparency.

The two federal agents involved in Villegas González’s arrest [weren’t wearing body cameras](#) during the deadly shooting. A program requiring them was scrapped by the Trump administration, the Chicago Sun-Times has reported.

Mourners at a vigil for Villegas González said days after his death that the 38-year-old father and cook from Michoacán, Mexico, was a “devoted father” of two and “kind soul.” He was his two children’s caretaker and had dropped off one of his kids at school minutes before he was shot, according to U.S. Rep. Delia Ramirez, D-III.

Pritzker has called for a “full, factual accounting of what’s happened.” Mexican President Claudia Sheinbaum [condemned the killing](#). And Reyna Torres Mendivil, the consul general of Mexico in Chicago, said the Mexican government has requested a “thorough investigation.”

“For everybody to be clear and to have peace of mind, I think it’s important to do that,” Torres Mendivil said.



Tom Schuba

Chicago Sun-Times • Watchdogs reporter/assistant editor

Nader Issa

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EXHIBIT T

Judge dismisses charges against 2 people accused of ramming vehicle of federal agents conducting Chicago immigration

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Chicago case dismissed for 2 accused of ramming federal agents' vehicle Prosecutors have dropped all charges against two motorists accused of intentionally ramming federal immigration agents in Chicago last month during "Operation Midway Blitz."

Jim Vondruska/Reuters

A federal judge on Thursday dismissed the indictment against [two people accused](#) last month of "ambushing" federal agents conducting an immigration sweep in Chicago, including a woman who was shot five times in the incident.

U.S. District Judge Georgia Alexakis dismissed the charges against Marimar Martinez and Anthony Ruiz after the Department of Justice abruptly requested her to do so.

Alexakis dismissed the charges with prejudice, meaning the case cannot be brought back.

The government filed a motion earlier Thursday asking the judge to "dismiss the indictment" against Martinez and Ruiz, who were involved in a collision with U.S. Customs and Border Protection (CBP) agents in Chicago on Oct. 4.



Law enforcement officers during a standoff with U.S. Immigration and Customs Enforcement (ICE) and federal officers in the Little Village neighborhood of Chicago, Oct. 4, 2025.

Jim Vondruska/Reuters

The incident set off street protests on Chicago's Southwest Side.

Martinez's attorney, Christopher Parente, told ABC News on Thursday that he and his client are relieved by the government's decision.

"We appreciate the U.S. attorney being thoughtful in agreeing to dismiss this," Parente said.

Martinez thanked the judge and "everybody that supported me."

"I'm just grateful for everything," Martinez told reporters after the hearing. "I'm just happy. I'm excited."

Parente told reporters that Martinez didn't deserve to be shot and that they are "going to work on getting her justice," but for now are thankful that the prosecutors "did the right thing."

Martinez, 30, and Ruiz, 21, were accused by the Department of Homeland Security (DHS) of being part of a convoy of protesters in vehicles that converged on CPB agents and rammed their vehicle during what the DHS called an "ambush."

An [October DHS statement](#) said CBP agents opened fire on Martinez in self-defense, alleging she was "armed with a semi-automatic weapon" and was driving one of three vehicles that "cornered" and rammed the CBP agents' vehicle.

'5 shots, 7 holes': Border patrol supervisor appeared to brag about shooting woman, defense attorney says →



A woman walks next to what appears to be smoke as U.S. federal agents (not pictured) detain people in the Old Irving Park neighborhood of Chicago, October 25, 2025.

James Hotchkiss/Reuters

Martinez was later found to have a handgun in her purse, for which she had a license and a concealed carry permit, according to Parente.

Martinez was never charged with any weapons offense in connection with the vehicular incident.

Martinez and Ruiz were both charged with assault with a deadly weapon in the alleged ramming attack.

DHS officials initially described Martinez, Ruiz and the other protesters involved in the incident as "domestic terrorists."

During Thursday's hearing, Assistant U.S. Attorney Ronald DeWald consented to dismissing the case with prejudice.

"We are not seeking any technical advantage here," DeWald said. "We do not intend to refile these charges."

The decision by the DOJ to dismiss the charges against Martinez and Ruiz came a day after a federal judge in Chicago ordered the government to turn over to the defense additional text messages by the CBP agents involved in the incident.

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agents in Chicago

During a Nov. 5 court hearing, CBP Agent Charles Exum, identified as the agent who shot Martinez, was questioned by Parente about text messages he sent to friends and family after the incident in which he [appeared to boast](#) about his shooting skills.

"I fired 5 rounds and she had 7 holes. Put that in your book, boys," one of those messages said.

When pressed by Parente about the text messages during his testimony, Exum said, "I am a firearms instructor and I take pride in my shooting skills."

Parente then asked, "So you're bragging that you shot her five times and gets seven holes, five shots? Are you literally bragging about this?"

Exum responded, "I'm just saying five shots, seven holes."

Federal prosecutors initially claimed that Exum fired rounds at Martinez in self-defense, saying that Martinez drove toward him when he exited his vehicle after the collision.

During an Oct. 6 hearing, Parente claimed in court that he viewed a body-camera video from one of the agents involved in the incident that he said appeared to show the federal vehicle swerve into Martinez's car.

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immigration crackdown**

"When I watched the video after this agent says, 'Do something, b----,' I see the driver of this vehicle turn the wheel to the left. Which would be consistent with him running into Ms. Martinez's vehicle, okay," Parente said. "And then seconds later, he jumps out and just starts shooting."

Parente also said Martinez is licensed to carry a concealed weapon and that the gun federal officials claimed she had during the confrontation with CBP agents was never removed from her purse.

In response to an ABC News request for comment about the motion to dismiss and Exum's text messages, DHS Assistant Secretary Tricia McLaughlin reiterated the agency's previous statements, again calling Martinez and Ruiz "domestic terrorists." McLaughlin did not address Exum's text messages and referred ABC News to the Justice Department for information about the charges against Martinez and Ruiz.

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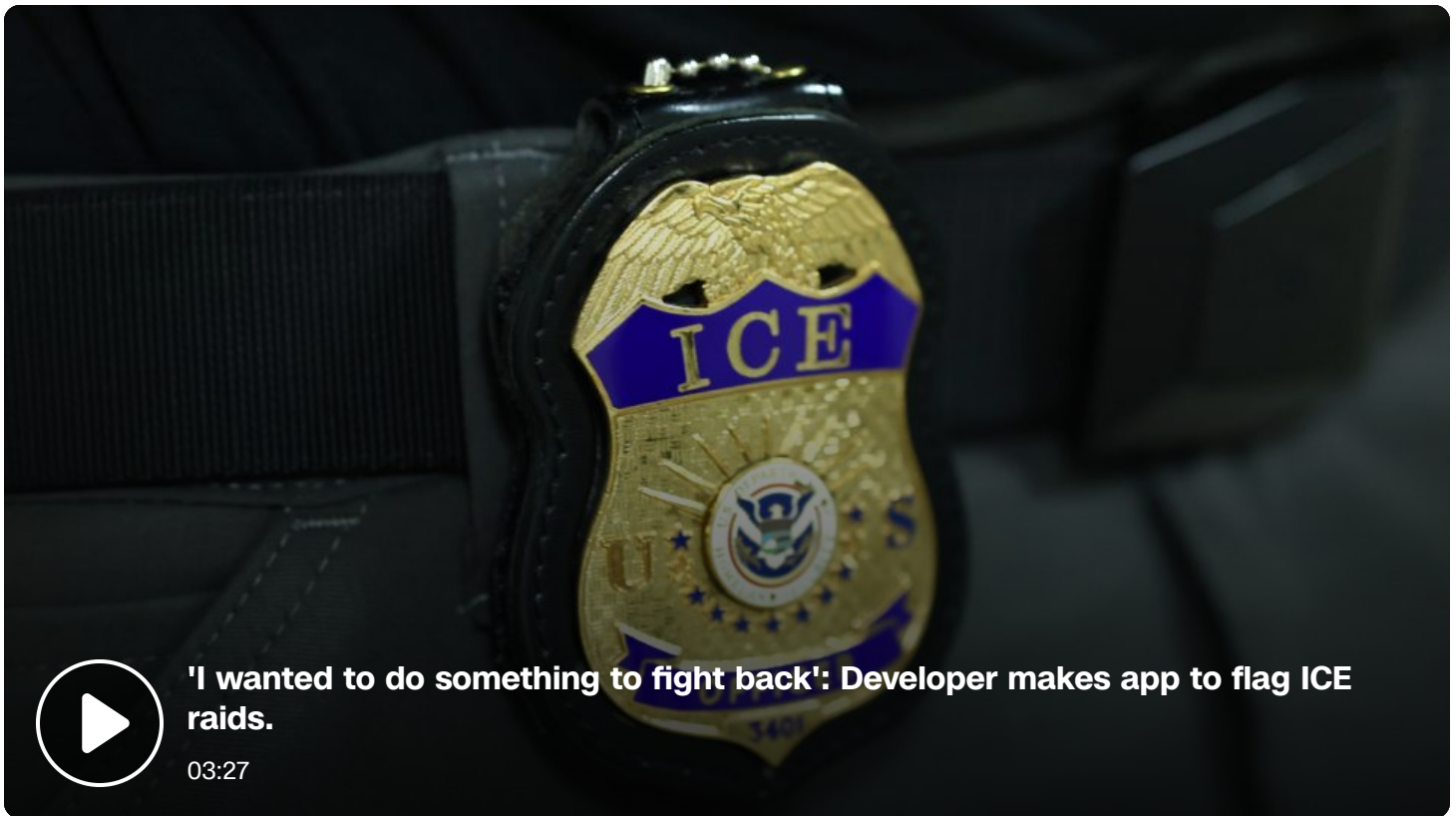
EXHIBIT U

'I wanted to do something to fight back': This iPhone app alerts users to nearby ICE sightings

By [Clare Duffy](#), CNN

🕒 3 min read · Updated 10:14 AM EDT, Mon June 30, 2025

     361 comments



New York (CNN) — Joshua Aaron has worked in and around the tech industry for around two decades. He built his first app — a blackjack game — at computer camp when he was 13.

His newest app is designed for a very different purpose: to let users alert people nearby to sightings of Immigration and Customs Enforcement agents in their area.

Aaron launched the platform, called ICEBlock, in early April after watching President Donald Trump's administration begin its [immigration crackdown](#). The White House's immigration policies have sparked mass protests across the United States; a [CNN poll](#) in April showed 52% of Americans polled said Trump has gone too far in deporting undocumented immigrants.

“When I saw what was happening in this country, I wanted to do something to fight back,” Aaron told CNN, adding that the deportation efforts feel, to him, reminiscent of Nazi Germany. “We’re literally watching history repeat itself.”

ICEBlock is designed to be an “early warning system” for users when ICE is operating nearby, Aaron said. Users can add a pin on a map showing where they spotted agents — along with optional notes, like what officers were wearing or what kind of car they were driving. Other users within a five-mile radius will then receive a push alert notifying them of the sighting.



RELATED ARTICLE

Exclusive: New Trump administration plan could end asylum claims and speed deportations for hundreds of thousands of migrants

Aaron said he hopes those notifications will help people avoid interactions with ICE, noting that he does not want users to interfere with the agency’s operations. The app provides a similar warning when users log a sighting: “Please note that the use of this app is for information and notification purposes only. It is not to be used for the purposes of inciting violence or interfering with law enforcement.”

What do you think?

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ICE did not respond to CNN’s request for comment regarding the app or Aaron’s characterization of the agency’s activity prior to this story’s publication. On Monday, ICE Acting Director Todd Lyons released a statement criticizing CNN’s report and saying that ICEBlock “basically paints a target on federal law enforcement officers’ backs” and that “officers and agents are already facing a 500% increase in assaults.”

ICEBlock doesn’t collect personal data, and users are completely anonymous, according to Aaron. It’s only available on iOS because Aaron says the app would have to collect information that could ultimately put users at risk to provide the same experience on Android.

Reassuring users of those privacy protections will likely be key to growing ICEBlock’s user base, given how the government is building a database to aid in its deportation efforts.

“We don’t want anybody’s device ID, IP address, location,” Aaron said. “We don’t want anything being discoverable. And so, this is 100% anonymous and free for anybody who wants to use it.”

he's built safeguards to prevent users from spamming the platform with fake sightings. Users can only report a sighting within five miles of their location, and they can only report once every five minutes. Reports are automatically deleted after four hours.

Aaron says he has no plans to monetize the free app but rather wants it to be a service to the community.

Aaron's work on ICEBlock stands in contrast to the support that some leaders in Silicon Valley have shown to Trump, including by donating to and attending his inauguration. Some companies have also announced investments in expanding their US presence following the president's push for domestic tech manufacturing.

"I think I would say grow a backbone. You can't just be about the money," Aaron said when asked what he would say to those tech leaders.

"I understand that you have shareholders to report to. I understand that you have employees that need their paychecks," he added. "But at what point do you say, 'Enough is enough'?"

This story has been updated with additional content.

361 comments

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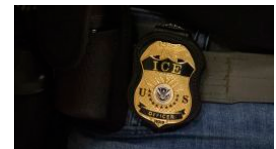
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White House Press Briefing on June 30, 2025
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ICE NEWSROOM

JUNE 30, 2025 • WASHINGTON, DC • STATEMENT

Statement from ICE acting Director Todd M. Lyons on news coverage of 'ICE spotting' app



“CNN’s promotion of an ‘ICE spotting’ app is reckless and irresponsible,” said ICE acting Director Todd M. Lyons. “Advertising an app that basically paints a target on federal law enforcement officers’ backs is sickening. My officers and agents are already facing a 500% increase in assaults, and going on live television to announce an app that lets anyone zero in on their locations is like inviting violence against them with a national megaphone. CNN is willfully endangering the lives of officers who put their lives on the line every day and enabling dangerous criminal aliens to evade U.S. law. Is this simply reckless 'journalism' or overt activism?”

Updated: 06/30/2025

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EXHIBIT X

**Interview of Tom Homan Published
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EXHIBIT Y

**Kristi Noem wants to prosecute CNN
over report on ICEBlock app that tracks ICE agents
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EXHIBIT Z

**Pam Bondi scolds CNN for allegedly promoting
ICE tracker app: 'Shame on them!'**

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EXHIBIT AA

BUSINESS > TECH • 4 MIN READ

Apple removes ICE tracking apps after Trump administration says they threaten officers

UPDATED OCT 3, 2025

By  Clare Duffy



Law enforcement personnel respond at the scene of a shooting at an Immigration and Customs Enforcement (ICE) field office in Dallas. (Jeffrey McWhorter/Reuters)

New York — Following a request from the US Department of Justice, Apple has removed ICEBlock and similar apps that allow people to alert others nearby about sightings of

Immigration and Customs Enforcement agents in their area. President Donald Trump and his administration have railed against the apps for months, arguing that they pose a threat to ICE agents.

In an email to ICEBlock creator Joshua Aaron, Apple wrote that “upon re-evaluation,” the app does not comply with its app store guidelines around “objectionable” and “defamatory, discriminatory, or mean-spirited content,” according to a copy of the message viewed by CNN.

“Information provided to Apple by law enforcement shows that your app violates” the app store guidelines because “it’s purpose is to provide location information about law enforcement officers that can be used to harm such officers individually or as a group,” the email states.

Aaron **has said** the ICEBlock app was intended to help people avoid contact with ICE agents. FBI Director Kash Patel **said** last month that a man **who shot at a Dallas ICE field office** planned the attack for weeks and “searched apps that tracked the presence of ICE agents.” Todd Lyons, acting director of ICE, said in June, “An app that lets anyone zero in on their locations is like inviting violence against them.”

ICE and the Department of Homeland Security did not immediately respond Friday to requests for comment. The Justice Department pointed to a statement from US Attorney General Pam Bondi saying that ICEBlock and similar apps crossed a line. The statement and removal of the apps was first reported by **Fox News Digital**.

“ICEBlock is designed to put ICE agents at risk just for doing their jobs, and violence against law enforcement is an intolerable red line that cannot be crossed,” Bondi said in the statement.

ICEBlock and similar apps have been available on Apple’s app store since the spring. Apple, in a statement, said the company removed the apps Thursday after communication with law enforcement. The company didn’t specifically cite ICE or DHS, but Bondi told Fox that the Justice Department reached out to Apple, “demanding” the company remove the apps.

“We created the App Store to be a safe and trusted place to discover apps,” Apple said in a statement. “Based on information we’ve received from law enforcement about the safety risks

Apple and its CEO Tim Cook have in recent months sought to strengthen the company’s relationship with the White House, amid policy changes from Trump that could threaten its business.

Aaron, the ICEBlock creator, has **denied that the app was intended** to incite violence against law enforcement. In a statement to CNN Friday, Aaron said he is “incredibly disappointed by Apple’s actions today” and called the claim that ICEBlock was designed to harm law enforcement officers “patently false.” The app had more than 1 million users prior to its removal, according to Aaron. The app was only available on Apple’s iOS, because Aaron previously said he would not be able to guarantee anonymity for users on Android.

“ICEBlock is no different from crowdsourcing speed traps, which every notable mapping application, including Apple’s own Maps app, implements as part of its core services,” he said. “This is protected speech under the First Amendment of the United States Constitution. We are determined to fight this with everything we have.”

Aaron told CNN in June that he hoped the crowdsourced notifications would help people avoid interactions with ICE. When users log a sighting in the ICEBlock app, it warns: “Please note that the use of this app is for information and notification purposes only. It is not to be used for the purposes of inciting violence or interfering with law enforcement.”

“Our mission has always been to protect our neighbors from the terror this administration continues to (rain) down on the people of this nation,” he said in his Friday statement.

But the White House has repeatedly admonished the apps and the media coverage about them. After CNN reported about ICEBlock in June, White House Press Secretary Karoline Leavitt sharply criticized CNN, saying at a news briefing that it was “unacceptable that a major network would promote such an app that is encouraging violence against law enforcement officers who are trying to keep our country safe.”

In a statement at the time, CNN denied it was promoting the app.

“This is an app that is publicly available to any iPhone user who wants to download it,” a CNN spokesperson said. “There is nothing illegal about reporting the existence of this or any other app, nor does such reporting constitute promotion or other endorsement of the app by CNN.”

Trump had threatened Apple, specifically, with steep tariffs for making its iPhone overseas, but Cook has gained favor with Trump in recent months after the company announced hundreds of billions of dollars in manufacturing investment in the United States. Trump has since limited the potential damage to Apple after exempting certain electronic products from tariffs following pledges from Cook. Nevertheless, Apple’s tariff bill has been around **\$1 billion per** quarter.

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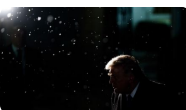
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EXHIBIT BB

APPLE Published October 2, 2025 8:12pm EDT | Updated October 2, 2025 8:21pm EDT

Apple takes down ICE tracking apps after pressure from Bondi DOJ

Bondi confirmed the department reached out to Apple Thursday to demand it remove ICEBlock



By **Ashley Oliver** | **FOXBusiness** |

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Attorney warns having ICE tracker app out there is 'problematic' for law enforcement

Acting U.S. Attorney for the Northern District of Texas Nancy Larson discusses dangers posed by ICE tracking apps.

FIRST ON FOX: [Apple](#) dropped ICEBlock, a widely used tracking tool, from its App Store Thursday after the Department of Justice raised concerns with the big tech giant that the app put law enforcement officers at risk.

DOJ officials, at the direction of Attorney General Pam Bondi, asked Apple to take down ICEBlock, a move that comes as Trump administration officials have claimed the tool, which allows users to anonymously report ICE agents' presence, puts agents in danger and helps shield illegal immigrants.

"We reached out to Apple today demanding they remove the ICEBlock app from their App Store — and Apple did so," Bondi said in a statement to Fox News Digital.

"ICEBlock is designed to put ICE agents at risk just for doing their jobs, and violence against law enforcement is an intolerable red line that cannot be crossed," Bondi added.



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DEPLOY TO ICE FACILITIES NATIONWIDE

Attorney General Pam Bondi speaks during a news conference at DEA headquarters July 15, 2025, in Arlington, Va. (Alex Wong/Getty Images / Getty Images)

Controversy surrounding ICE tracking apps intensified after last month's deadly shooting at an ICE field office in Dallas, Texas, the latest in a series of attacks that appeared to be targeting immigration enforcement officers.

Authorities said the suspect, Joshua Jahn, searched his phone for tracking apps, including ICEBlock, before opening fire on the facility from a rooftop. Authorities said Jahn killed one detainee and left two critically injured but that the personnel were his intended targets, not the immigrants. One of the injured, a 32-year-old husband and father of four, [died this week](#).

Marcos Charles, an acting director for ICE's removal operations, said during a press conference that Jahn had intended to murder ICE employees and that attacks on them have skyrocketed.

"The evidence is clear that this was intended as an assault on ICE personnel who come to work everyday to do their job," Charles said. "Violent rhetoric has led to an over 1000% increase in assaults on ICE officers, and it has to stop."

Joshua Jahn allegedly shot at an ICE facility in Dallas, Texas, on Sept. 24, 2025, and the FBI said a bullet with "ANTI-ICE" on it was found at the scene. (FBI; Contributed to Fox News)

Fox News Digital reached out to Apple and ICEBlock for comment.



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"We created the App Store to be a safe and trusted place to discover apps. Based on information we've received from law enforcement about the safety risks associated with ICEBlock, we have removed it and similar apps from the App Store," Apple said.

Joshua Aaron, ICEBlock's creator, said he was "incredibly disappointed by Apple's actions today."

"Capitulating to an authoritarian regime is never the right move," Aaron said. "Apple has claimed they received information from law enforcement that ICEBlock served to harm law enforcement officers. This is patently false."

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Aaron said ICEBlock, which has more than 1.1 million users, functions like other mapping applications that use crowd sourcing for speed traps, citing Apple's own map service as an example.

"We are determined to fight this with everything we have," Aaron said. "Our mission has always been to protect our neighbors from the terror this administration continues to reign down on the people of this nation."

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EXHIBIT CC

**Roundtable Discussion at the White House on October 8, 2025
[.mov to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT DD



Post

 **Laura Loomer** 
@LauraLoomer

NEW:

It appears that Facebook is still allowing people to have ICE tracking pages despite the fact that ICE tracking apps and ICE tracking accounts are getting people killed.

Cc: @KristiNoem @TriciaOhio @PamBondi

There is a page on Facebook called "ICE Sighting-Chicagoland" that is providing location updates on ICE raids and ICE agent locations in the Chicago area.

Following my expose of the ICE tracking app Red Dot, the DOJ ordered Apple to delete the App from the App Store.

You'd think other Big Tech executives would use this as an opportunity to be in compliance and to support President Trump's immigration policies, but they aren't.

Mark Zuckerberg was at the White House last month, sitting next to President Trump and having dinner. To this day, he has faced zero punishment from the admin for silencing President Trump and his supporters, helping to steal an election and censoring millions of Americans during COVID.

How come there is never any accountability for Zuckerberg and his crimes? He's just trying to cover his own ass while he continues to work against the Trump admin every single day.

Here is more evidence of Zuckerberg's leftist subversion of Trump and his policies.

Perhaps Zuck needs to be contacted by the DOJ as well since he has no regard for the life of @ICEgov agents.



ICE Sighting- Chicagoland >

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EXHIBIT EE





← Post

 **Laura Loomer** 
@LauraLoomer

Fantastic news. DOJ source tells me they have seen my report and they have contacted Facebook and their executives at META to tell them they need to remove these ICE tracking pages from the platform.


We will see if they comply. There are DOZENS of pages like the one below that endanger the lives of @ICEgov agents.

It's further evidence Big Tech is continuing to subvert and undermine President Trump and his agenda.

 **Laura Loomer**  @LauraLoomer · Oct 12, 2025

NEW:

It appears that Facebook is still allowing people to have ICE tracking pages despite the fact that ICE tracking apps and ICE tracking accounts are getting people killed....
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EXHIBIT FF

1. Safety

Introduction

Before You Submit

1. Safety

1.1 Objectionable Content

1.2 User-Generated Content

1.3 Kids Category

1.4 Physical Harm

1.5 Developer Information

1.6 Data Security

1.7 Reporting Criminal Activity

2. Performance

3. Business

4. Design

5. Legal

When people install an app from the App Store, they want to feel confident that it's safe to do so—that the app doesn't contain upsetting or offensive content, won't damage their device, and isn't likely to cause physical harm from its use. We've outlined the major pitfalls below, but if you're looking to shock and offend people, the App Store isn't the right place for your app. Some of these rules are also included in Notarization for iOS and iPadOS apps.

1.1 Objectionable Content

Apps should not include content that is offensive, insensitive, upsetting, intended to disgust, in exceptionally poor taste, or just plain creepy. Examples of such content include:

1.1.1 Defamatory, discriminatory, or mean-spirited content, including references or commentary about religion, race, sexual orientation, gender, national/ethnic origin, or other targeted groups, particularly if the app is likely to humiliate, intimidate, or harm a targeted individual or group. Professional political satirists and humorists are generally exempt from this requirement.

EXHIBIT GG

Guideline 1.1.1 - Defamatory or Mean-Spirited Content	Total	9
Guideline 1.1.1 - Defamatory or Mean-Spirited Content	Russia	5
Guideline 1.1.1 - Defamatory or Mean-Spirited Content	United States	3
Guideline 1.1.1 - Defamatory or Mean-Spirited Content	China mainland	1

EXHIBIT HH

Guideline 1.1.1 - Defamatory or Mean-Spirited Content	Total	6	
Guideline 1.1.1 - Defamatory or Mean-Spirited Content	United States	4	
Guideline 1.1.1 - Defamatory or Mean-Spirited Content	Türkiye	2	

EXHIBIT II

Apps Removed from the App Store Due to Guideline or DPLA Violation 2024

Apps Removed from the App Store Due to Guideline or Developer Program License Agreement (DPLA) Violation: Breakout by Country/Region			Note: Country/Region denotes the origin of the developer of the removed app.
Guideline/DPLA Violation	Country/Region	Apps Removed	
Guideline 4.0 - Design	Total	42252	
Guideline 4.0 - Design	United States	7964	
Guideline 4.0 - Design	China mainland	5509	
Guideline 4.0 - Design	India	2453	
Guideline 4.0 - Design	United Kingdom	1960	
Guideline 4.0 - Design	Brazil	1821	
Guideline 4.0 - Design	Japan	1516	
Guideline 4.0 - Design	Türkiye	1276	
Guideline 4.0 - Design	Germany	1235	
Guideline 4.0 - Design	Italy	1151	
Guideline 4.0 - Design	Canada	1031	
Guideline 4.0 - Design	France	980	
Guideline 4.0 - Design	South Korea	955	
Guideline 4.0 - Design	Russia	921	
Guideline 4.0 - Design	Spain	846	
Guideline 4.0 - Design	Vietnam	816	
Guideline 4.0 - Design	Australia	760	
Guideline 4.0 - Design	Netherlands	555	
Guideline 4.0 - Design	Mexico	548	
Guideline 4.0 - Design	Taiwan	495	
Guideline 4.0 - Design	Hong Kong	449	
Guideline 4.0 - Design	Thailand	414	
Guideline 4.0 - Design	Ukraine	351	
Guideline 4.0 - Design	United Arab Emirates	344	
Guideline 4.0 - Design	Malaysia	339	
Guideline 4.0 - Design	Israel	321	
Guideline 4.0 - Design	Poland	317	
Guideline 4.0 - Design	Switzerland	299	
Guideline 4.0 - Design	Singapore	292	
Guideline 4.0 - Design	Egypt	275	
Guideline 4.0 - Design	Saudi Arabia	267	
Guideline 4.0 - Design	Ireland	244	
Guideline 4.0 - Design	Pakistan	240	
Guideline 4.0 - Design	Sweden	234	
Guideline 4.0 - Design	Argentina	212	
Guideline 4.0 - Design	South Africa	210	
Guideline 4.0 - Design	Indonesia	207	
Guideline 4.0 - Design	Belgium	190	
Guideline 4.0 - Design	Denmark	187	
Guideline 4.0 - Design	Portugal	166	
Guideline 4.0 - Design	New Zealand	159	
Guideline 4.0 - Design	Romania	155	
Guideline 4.0 - Design	Colombia	155	
Guideline 4.0 - Design	Chile	145	
Guideline 4.0 - Design	Finland	131	
Guideline 4.0 - Design	Czechia	130	
Guideline 4.0 - Design	Austria	129	
Guideline 4.0 - Design	Norway	123	

Guideline 4.0 - Design	Hungary	116
Guideline 4.0 - Design	Greece	114
Guideline 4.0 - Design	Philippines	108
Guideline 4.0 - Design	Jordan	101
Guideline 4.0 - Design	Morocco	100
Guideline 4.0 - Design	Belarus	96
Guideline 4.0 - Design	Kuwait	95
Guideline 4.0 - Design	Nigeria	83
Guideline 4.0 - Design	Lebanon	80
Guideline 4.0 - Design	Peru	79
Guideline 4.0 - Design	Estonia	72
Guideline 4.0 - Design	Slovakia	70
Guideline 4.0 - Design	Bulgaria	70
Guideline 4.0 - Design	Costa Rica	68
Guideline 4.0 - Design	Sri Lanka	67
Guideline 4.0 - Design	Qatar	64
Guideline 4.0 - Design	Ecuador	61
Guideline 4.0 - Design	Kazakhstan	59
Guideline 4.0 - Design	Armenia	48
Guideline 4.0 - Design	Cyprus	46
Guideline 4.0 - Design	Croatia	42
Guideline 4.0 - Design	Serbia	42
Guideline 4.0 - Design	Cambodia	41
Guideline 4.0 - Design	Bangladesh	41
Guideline 4.0 - Design	Lithuania	40
Guideline 4.0 - Design	Iraq	37
Guideline 4.0 - Design	Bolivia	35
Guideline 4.0 - Design	Moldova	35
Guideline 4.0 - Design	Nepal	34
Guideline 4.0 - Design	Mongolia	33
Guideline 4.0 - Design	Guatemala	32
Guideline 4.0 - Design	Ghana	31
Guideline 4.0 - Design	Panama	28
Guideline 4.0 - Design	Slovenia	27
Guideline 4.0 - Design	Kenya	27
Guideline 4.0 - Design	Georgia	26
Guideline 4.0 - Design	Puerto Rico	26
Guideline 4.0 - Design	Oman	24
Guideline 4.0 - Design	Tunisia	24
Guideline 4.0 - Design	Latvia	22
Guideline 4.0 - Design	Uruguay	22
Guideline 4.0 - Design	Dominican Republic	21
Guideline 4.0 - Design	Macao	21
Guideline 4.0 - Design	Luxembourg	19
Guideline 4.0 - Design	Bahrain	17
Guideline 4.0 - Design	Venezuela	17
Guideline 4.0 - Design	North Macedonia	17
Guideline 4.0 - Design	Albania	17
Guideline 4.0 - Design	San Marino	16
Guideline 4.0 - Design	Uzbekistan	14
Guideline 4.0 - Design	Palestinian Territories	14
Guideline 4.0 - Design	El Salvador	14
Guideline 4.0 - Design	British Virgin Islands	14

Guideline 4.0 - Design	Seychelles	14
Guideline 4.0 - Design	Uganda	14
Guideline 4.0 - Design	Azerbaijan	14
Guideline 4.0 - Design	Iceland	12
Guideline 4.0 - Design	Malta	12
Guideline 4.0 - Design	Algeria	12
Guideline 4.0 - Design	Cote D'Ivoire	12
Guideline 4.0 - Design	Myanmar	11
Guideline 4.0 - Design	Honduras	11
Guideline 4.0 - Design	Paraguay	11
Guideline 4.0 - Design	Trinidad and Tobago	9
Guideline 4.0 - Design	Senegal	8
Guideline 4.0 - Design	Tanzania	8
Guideline 4.0 - Design	Bosnia and Herzegovina	8
Guideline 4.0 - Design	Namibia	7
Guideline 4.0 - Design	Belize	7
Guideline 4.0 - Design	Maldives	7
Guideline 4.0 - Design	Nicaragua	7
Guideline 4.0 - Design	Jamaica	6
Guideline 4.0 - Design	Zambia	6
Guideline 4.0 - Design	Haiti	5
Guideline 4.0 - Design	Barbados	5
Guideline 4.0 - Design	Somalia	5
Guideline 4.0 - Design	Reunion	5
Guideline 4.0 - Design	Cayman Islands	5
Guideline 4.0 - Design	Montenegro	5
Guideline 4.0 - Design	Bermuda	4
Guideline 4.0 - Design	Gibraltar	4
Guideline 4.0 - Design	Laos	4
Guideline 4.0 - Design	Bahamas	4
Guideline 4.0 - Design	Angola	4
Guideline 4.0 - Design	Mauritania	3
Guideline 4.0 - Design	Kyrgyzstan	3
Guideline 4.0 - Design	Yemen	3
Guideline 4.0 - Design	Cameroon	3
Guideline 4.0 - Design	Afghanistan	3
Guideline 4.0 - Design	Brunei	3
Guideline 4.0 - Design	Mozambique	2
Guideline 4.0 - Design	Curaçao	2
Guideline 4.0 - Design	Ethiopia	2
Guideline 4.0 - Design	Guadeloupe	2
Guideline 4.0 - Design	Andorra	2
Guideline 4.0 - Design	Rwanda	2
Guideline 4.0 - Design	Tajikistan	2
Guideline 4.0 - Design	United States Minor O	2
Guideline 4.0 - Design	Monaco	2
Guideline 4.0 - Design	Mauritius	2
Guideline 4.0 - Design	Marshall Islands	2
Guideline 4.0 - Design	Bhutan	2
Guideline 4.0 - Design	Madagascar	2
Guideline 4.0 - Design	Malawi	2
Guideline 4.0 - Design	Guam	1
Guideline 4.0 - Design	Cape Verde	1

Guideline 4.0 - Design	Burkina Faso	1
Guideline 4.0 - Design	Benin	1
Guideline 4.0 - Design	Antigua and Barbuda	1
Guideline 4.0 - Design	Mali	1
Guideline 4.0 - Design	Liberia	1
Guideline 4.0 - Design	Kosovo	1
Guideline 4.0 - Design	Guyana	1
Guideline 4.0 - Design	Zimbabwe	1
Guideline 4.0 - Design	Turks and Caicos	1
Guideline 4.0 - Design	Togo	1
Guideline 4.0 - Design	Suriname	1
Guideline 4.0 - Design	Sierra Leone	1
Guideline 4.0 - Design	Guinea	1
Guideline 4.0 - Design	Samoa	1
DPLA 3.2(f) - Fraud	Total	38315
DPLA 3.2(f) - Fraud	Vietnam	8747
DPLA 3.2(f) - Fraud	China mainland	7003
DPLA 3.2(f) - Fraud	Pakistan	4270
DPLA 3.2(f) - Fraud	United States	3353
DPLA 3.2(f) - Fraud	India	2214
DPLA 3.2(f) - Fraud	Türkiye	1517
DPLA 3.2(f) - Fraud	United Kingdom	974
DPLA 3.2(f) - Fraud	Ukraine	905
DPLA 3.2(f) - Fraud	Hong Kong	828
DPLA 3.2(f) - Fraud	Singapore	822
DPLA 3.2(f) - Fraud	Canada	502
DPLA 3.2(f) - Fraud	Georgia	452
DPLA 3.2(f) - Fraud	Israel	426
DPLA 3.2(f) - Fraud	Nigeria	327
DPLA 3.2(f) - Fraud	Australia	311
DPLA 3.2(f) - Fraud	Malaysia	301
DPLA 3.2(f) - Fraud	Morocco	293
DPLA 3.2(f) - Fraud	Philippines	273
DPLA 3.2(f) - Fraud	Indonesia	263
DPLA 3.2(f) - Fraud	Russia	262
DPLA 3.2(f) - Fraud	United Arab Emirates	247
DPLA 3.2(f) - Fraud	Jordan	244
DPLA 3.2(f) - Fraud	Thailand	209
DPLA 3.2(f) - Fraud	Germany	203
DPLA 3.2(f) - Fraud	Egypt	160
DPLA 3.2(f) - Fraud	Japan	154
DPLA 3.2(f) - Fraud	Azerbaijan	147
DPLA 3.2(f) - Fraud	Serbia	143
DPLA 3.2(f) - Fraud	Spain	130
DPLA 3.2(f) - Fraud	Mexico	124
DPLA 3.2(f) - Fraud	Moldova	103
DPLA 3.2(f) - Fraud	Argentina	103
DPLA 3.2(f) - Fraud	Taiwan	99
DPLA 3.2(f) - Fraud	France	95
DPLA 3.2(f) - Fraud	Kazakhstan	95
DPLA 3.2(f) - Fraud	Macao	90
DPLA 3.2(f) - Fraud	Kuwait	88
DPLA 3.2(f) - Fraud	Ecuador	80

DPLA 3.2(f) - Fraud	Poland	74
DPLA 3.2(f) - Fraud	Sri Lanka	73
DPLA 3.2(f) - Fraud	New Zealand	72
DPLA 3.2(f) - Fraud	Belarus	66
DPLA 3.2(f) - Fraud	Kenya	65
DPLA 3.2(f) - Fraud	Trinidad and Tobago	60
DPLA 3.2(f) - Fraud	Paraguay	56
DPLA 3.2(f) - Fraud	Portugal	55
DPLA 3.2(f) - Fraud	Netherlands	55
DPLA 3.2(f) - Fraud	Estonia	48
DPLA 3.2(f) - Fraud	Sweden	47
DPLA 3.2(f) - Fraud	Italy	47
DPLA 3.2(f) - Fraud	Peru	47
DPLA 3.2(f) - Fraud	Brazil	47
DPLA 3.2(f) - Fraud	Armenia	45
DPLA 3.2(f) - Fraud	Oman	42
DPLA 3.2(f) - Fraud	Ireland	38
DPLA 3.2(f) - Fraud	Chile	36
DPLA 3.2(f) - Fraud	Bangladesh	36
DPLA 3.2(f) - Fraud	Uganda	35
DPLA 3.2(f) - Fraud	South Korea	34
DPLA 3.2(f) - Fraud	Lebanon	33
DPLA 3.2(f) - Fraud	Uzbekistan	31
DPLA 3.2(f) - Fraud	Finland	31
DPLA 3.2(f) - Fraud	Austria	30
DPLA 3.2(f) - Fraud	Mauritius	29
DPLA 3.2(f) - Fraud	Saudi Arabia	28
DPLA 3.2(f) - Fraud	Cyprus	26
DPLA 3.2(f) - Fraud	South Africa	25
DPLA 3.2(f) - Fraud	Latvia	25
DPLA 3.2(f) - Fraud	Ghana	23
DPLA 3.2(f) - Fraud	Namibia	22
DPLA 3.2(f) - Fraud	Denmark	19
DPLA 3.2(f) - Fraud	Czechia	19
DPLA 3.2(f) - Fraud	Nepal	18
DPLA 3.2(f) - Fraud	Tanzania	17
DPLA 3.2(f) - Fraud	Qatar	17
DPLA 3.2(f) - Fraud	Lithuania	16
DPLA 3.2(f) - Fraud	Hungary	16
DPLA 3.2(f) - Fraud	Bulgaria	16
DPLA 3.2(f) - Fraud	Rwanda	12
DPLA 3.2(f) - Fraud	British Virgin Islands	12
DPLA 3.2(f) - Fraud	Romania	11
DPLA 3.2(f) - Fraud	Cambodia	11
DPLA 3.2(f) - Fraud	Dominican Republic	10
DPLA 3.2(f) - Fraud	Mozambique	10
DPLA 3.2(f) - Fraud	Iraq	10
DPLA 3.2(f) - Fraud	Uruguay	9
DPLA 3.2(f) - Fraud	Algeria	8
DPLA 3.2(f) - Fraud	Colombia	8
DPLA 3.2(f) - Fraud	Switzerland	8
DPLA 3.2(f) - Fraud	Slovenia	8
DPLA 3.2(f) - Fraud	Slovakia	8

DPLA 3.2(f) - Fraud	Botswana	7
DPLA 3.2(f) - Fraud	Zambia	6
DPLA 3.2(f) - Fraud	Honduras	6
DPLA 3.2(f) - Fraud	Croatia	6
DPLA 3.2(f) - Fraud	Costa Rica	6
DPLA 3.2(f) - Fraud	Angola	5
DPLA 3.2(f) - Fraud	Bosnia and Herzegovina	5
DPLA 3.2(f) - Fraud	Panama	5
DPLA 3.2(f) - Fraud	Kyrgyzstan	5
DPLA 3.2(f) - Fraud	Guatemala	5
DPLA 3.2(f) - Fraud	Yemen	4
DPLA 3.2(f) - Fraud	Belize	4
DPLA 3.2(f) - Fraud	Tunisia	4
DPLA 3.2(f) - Fraud	Laos	4
DPLA 3.2(f) - Fraud	Malta	4
DPLA 3.2(f) - Fraud	Greece	4
DPLA 3.2(f) - Fraud	Albania	3
DPLA 3.2(f) - Fraud	El Salvador	3
DPLA 3.2(f) - Fraud	Venezuela	3
DPLA 3.2(f) - Fraud	Norway	3
DPLA 3.2(f) - Fraud	Malawi	3
DPLA 3.2(f) - Fraud	Zimbabwe	2
DPLA 3.2(f) - Fraud	Cayman Islands	2
DPLA 3.2(f) - Fraud	Luxembourg	1
DPLA 3.2(f) - Fraud	Tajikistan	1
DPLA 3.2(f) - Fraud	Brunei	1
DPLA 3.2(f) - Fraud	Gambia	1
DPLA 3.2(f) - Fraud	Jamaica	1
DPLA 3.2(f) - Fraud	Liberia	1
DPLA 3.2(f) - Fraud	Madagascar	1
DPLA 3.2(f) - Fraud	Maldives	1
DPLA 3.2(f) - Fraud	Mongolia	1
DPLA 3.2(f) - Fraud	Montenegro	1
DPLA 3.2(f) - Fraud	Myanmar	1
DPLA 3.2(f) - Fraud	Nicaragua	1
DPLA 3.2(f) - Fraud	Seychelles	1
DPLA 3.2(f) - Fraud	Sierra Leone	1
DPLA 3.2(f) - Fraud	Belgium	1
DPLA 6.3 - Intellectual Property Infringement	Total	425
DPLA 6.3 - Intellectual Property Infringement	China mainland	109
DPLA 6.3 - Intellectual Property Infringement	Vietnam	40
DPLA 6.3 - Intellectual Property Infringement	United States	32
DPLA 6.3 - Intellectual Property Infringement	India	26
DPLA 6.3 - Intellectual Property Infringement	Türkiye	23
DPLA 6.3 - Intellectual Property Infringement	Hong Kong	19
DPLA 6.3 - Intellectual Property Infringement	Pakistan	16
DPLA 6.3 - Intellectual Property Infringement	Russia	11
DPLA 6.3 - Intellectual Property Infringement	Ukraine	9
DPLA 6.3 - Intellectual Property Infringement	Morocco	9
DPLA 6.3 - Intellectual Property Infringement	Israel	9
DPLA 6.3 - Intellectual Property Infringement	United Kingdom	8
DPLA 6.3 - Intellectual Property Infringement	Germany	7
DPLA 6.3 - Intellectual Property Infringement	Georgia	6

DPLA 6.3 - Intellectual Property Infringement	Brazil	6
DPLA 6.3 - Intellectual Property Infringement	Canada	5
DPLA 6.3 - Intellectual Property Infringement	United Arab Emirates	5
DPLA 6.3 - Intellectual Property Infringement	Indonesia	5
DPLA 6.3 - Intellectual Property Infringement	Mexico	4
DPLA 6.3 - Intellectual Property Infringement	Australia	4
DPLA 6.3 - Intellectual Property Infringement	Singapore	4
DPLA 6.3 - Intellectual Property Infringement	Cyprus	3
DPLA 6.3 - Intellectual Property Infringement	Nigeria	3
DPLA 6.3 - Intellectual Property Infringement	Kazakhstan	3
DPLA 6.3 - Intellectual Property Infringement	South Korea	3
DPLA 6.3 - Intellectual Property Infringement	Egypt	3
DPLA 6.3 - Intellectual Property Infringement	Saudi Arabia	3
DPLA 6.3 - Intellectual Property Infringement	Zambia	2
DPLA 6.3 - Intellectual Property Infringement	South Africa	2
DPLA 6.3 - Intellectual Property Infringement	Netherlands	2
DPLA 6.3 - Intellectual Property Infringement	Myanmar	2
DPLA 6.3 - Intellectual Property Infringement	Colombia	2
DPLA 6.3 - Intellectual Property Infringement	Moldova	2
DPLA 6.3 - Intellectual Property Infringement	Malaysia	2
DPLA 6.3 - Intellectual Property Infringement	Spain	2
DPLA 6.3 - Intellectual Property Infringement	Tanzania	2
DPLA 6.3 - Intellectual Property Infringement	France	2
DPLA 6.3 - Intellectual Property Infringement	Switzerland	2
DPLA 6.3 - Intellectual Property Infringement	Hungary	2
DPLA 6.3 - Intellectual Property Infringement	Taiwan	1
DPLA 6.3 - Intellectual Property Infringement	Uzbekistan	1
DPLA 6.3 - Intellectual Property Infringement	Algeria	1
DPLA 6.3 - Intellectual Property Infringement	Armenia	1
DPLA 6.3 - Intellectual Property Infringement	Bangladesh	1
DPLA 6.3 - Intellectual Property Infringement	British Virgin Islands	1
DPLA 6.3 - Intellectual Property Infringement	Burkina Faso	1
DPLA 6.3 - Intellectual Property Infringement	Chile	1
DPLA 6.3 - Intellectual Property Infringement	Denmark	1
DPLA 6.3 - Intellectual Property Infringement	Dominican Republic	1
DPLA 6.3 - Intellectual Property Infringement	Finland	1
DPLA 6.3 - Intellectual Property Infringement	Ghana	1
DPLA 6.3 - Intellectual Property Infringement	Italy	1
DPLA 6.3 - Intellectual Property Infringement	Japan	1
DPLA 6.3 - Intellectual Property Infringement	Jordan	1
DPLA 6.3 - Intellectual Property Infringement	Kenya	1
DPLA 6.3 - Intellectual Property Infringement	Kuwait	1
DPLA 6.3 - Intellectual Property Infringement	Lebanon	1
DPLA 6.3 - Intellectual Property Infringement	Mongolia	1
DPLA 6.3 - Intellectual Property Infringement	Norway	1
DPLA 6.3 - Intellectual Property Infringement	Portugal	1
DPLA 6.3 - Intellectual Property Infringement	Qatar	1
DPLA 6.3 - Intellectual Property Infringement	Romania	1
DPLA 6.3 - Intellectual Property Infringement	Serbia	1
DPLA 6.3 - Intellectual Property Infringement	Seychelles	1
DPLA 6.3 - Intellectual Property Infringement	Sweden	1
Guideline 4.3.0 - Spam	Total	294
Guideline 4.3.0 - Spam	India	103

Guideline 4.3.0 - Spam	China mainland	94
Guideline 4.3.0 - Spam	Vietnam	18
Guideline 4.3.0 - Spam	Hong Kong	15
Guideline 4.3.0 - Spam	Türkiye	11
Guideline 4.3.0 - Spam	United States	10
Guideline 4.3.0 - Spam	Pakistan	6
Guideline 4.3.0 - Spam	United Kingdom	5
Guideline 4.3.0 - Spam	Morocco	5
Guideline 4.3.0 - Spam	Singapore	4
Guideline 4.3.0 - Spam	Russia	3
Guideline 4.3.0 - Spam	Italy	2
Guideline 4.3.0 - Spam	Ukraine	2
Guideline 4.3.0 - Spam	Georgia	2
Guideline 4.3.0 - Spam	Kenya	2
Guideline 4.3.0 - Spam	France	1
Guideline 4.3.0 - Spam	Cyprus	1
Guideline 4.3.0 - Spam	Belarus	1
Guideline 4.3.0 - Spam	Armenia	1
Guideline 4.3.0 - Spam	Argentina	1
Guideline 4.3.0 - Spam	Netherlands	1
Guideline 4.3.0 - Spam	Thailand	1
Guideline 4.3.0 - Spam	United Arab Emirates	1
Guideline 4.3.0 - Spam	Latvia	1
Guideline 4.3.0 - Spam	Japan	1
Guideline 4.3.0 - Spam	Israel	1
Guideline 4.3.0 - Spam	Germany	1
DPLA 4.8 - Export Control	Total	285
DPLA 4.8 - Export Control	Russia	227
DPLA 4.8 - Export Control	Belarus	36
DPLA 4.8 - Export Control	Kazakhstan	13
DPLA 4.8 - Export Control	Myanmar	3
DPLA 4.8 - Export Control	China mainland	3
DPLA 4.8 - Export Control	Venezuela	1
DPLA 4.8 - Export Control	United Arab Emirates	1
DPLA 4.8 - Export Control	Belize	1
Guideline 4.1.0 - Copycats	Total	128
Guideline 4.1.0 - Copycats	Morocco	18
Guideline 4.1.0 - Copycats	Vietnam	14
Guideline 4.1.0 - Copycats	Pakistan	13
Guideline 4.1.0 - Copycats	China mainland	12
Guideline 4.1.0 - Copycats	United Kingdom	10
Guideline 4.1.0 - Copycats	United States	9
Guideline 4.1.0 - Copycats	Russia	8
Guideline 4.1.0 - Copycats	Türkiye	4
Guideline 4.1.0 - Copycats	Hong Kong	3
Guideline 4.1.0 - Copycats	Ukraine	3
Guideline 4.1.0 - Copycats	France	3
Guideline 4.1.0 - Copycats	Finland	2
Guideline 4.1.0 - Copycats	Denmark	2
Guideline 4.1.0 - Copycats	India	2
Guideline 4.1.0 - Copycats	Kazakhstan	2
Guideline 4.1.0 - Copycats	Singapore	2
Guideline 4.1.0 - Copycats	Canada	2

Guideline 4.1.0 - Copycats	Australia	1
Guideline 4.1.0 - Copycats	Brazil	1
Guideline 4.1.0 - Copycats	British Virgin Islands	1
Guideline 4.1.0 - Copycats	Georgia	1
Guideline 4.1.0 - Copycats	Germany	1
Guideline 4.1.0 - Copycats	Hungary	1
Guideline 4.1.0 - Copycats	Indonesia	1
Guideline 4.1.0 - Copycats	Israel	1
Guideline 4.1.0 - Copycats	Italy	1
Guideline 4.1.0 - Copycats	Japan	1
Guideline 4.1.0 - Copycats	Jordan	1
Guideline 4.1.0 - Copycats	Libya	1
Guideline 4.1.0 - Copycats	New Zealand	1
Guideline 4.1.0 - Copycats	Norway	1
Guideline 4.1.0 - Copycats	Poland	1
Guideline 4.1.0 - Copycats	South Korea	1
Guideline 4.1.0 - Copycats	Tajikistan	1
Guideline 4.1.0 - Copycats	United Arab Emirates	1
Guideline 4.1.0 - Copycats	United States Minor O	1
Guideline 5.6.0 - Developer Code of Conduct	Total	99
Guideline 5.6.0 - Developer Code of Conduct	United States	26
Guideline 5.6.0 - Developer Code of Conduct	China mainland	13
Guideline 5.6.0 - Developer Code of Conduct	India	9
Guideline 5.6.0 - Developer Code of Conduct	Nigeria	6
Guideline 5.6.0 - Developer Code of Conduct	Cyprus	5
Guideline 5.6.0 - Developer Code of Conduct	United Kingdom	4
Guideline 5.6.0 - Developer Code of Conduct	Pakistan	3
Guideline 5.6.0 - Developer Code of Conduct	Canada	3
Guideline 5.6.0 - Developer Code of Conduct	Hong Kong	3
Guideline 5.6.0 - Developer Code of Conduct	Japan	3
Guideline 5.6.0 - Developer Code of Conduct	France	3
Guideline 5.6.0 - Developer Code of Conduct	Israel	2
Guideline 5.6.0 - Developer Code of Conduct	Türkiye	2
Guideline 5.6.0 - Developer Code of Conduct	Singapore	2
Guideline 5.6.0 - Developer Code of Conduct	United Arab Emirates	1
Guideline 5.6.0 - Developer Code of Conduct	Tanzania	1
Guideline 5.6.0 - Developer Code of Conduct	Switzerland	1
Guideline 5.6.0 - Developer Code of Conduct	Sweden	1
Guideline 5.6.0 - Developer Code of Conduct	Seychelles	1
Guideline 5.6.0 - Developer Code of Conduct	Serbia	1
Guideline 5.6.0 - Developer Code of Conduct	Moldova	1
Guideline 5.6.0 - Developer Code of Conduct	Malaysia	1
Guideline 5.6.0 - Developer Code of Conduct	Lithuania	1
Guideline 5.6.0 - Developer Code of Conduct	Lebanon	1
Guideline 5.6.0 - Developer Code of Conduct	Germany	1
Guideline 5.6.0 - Developer Code of Conduct	Georgia	1
Guideline 5.6.0 - Developer Code of Conduct	British Virgin Islands	1
Guideline 5.6.0 - Developer Code of Conduct	Belgium	1
Guideline 5.6.0 - Developer Code of Conduct	Brazil	1
Guideline 5.0.0 - General	Total	89
Guideline 5.0.0 - General	United States	24
Guideline 5.0.0 - General	China mainland	22
Guideline 5.0.0 - General	Russia	8

Guideline 5.0.0 - General	Pakistan	4
Guideline 5.0.0 - General	Vietnam	4
Guideline 5.0.0 - General	United Kingdom	3
Guideline 5.0.0 - General	India	2
Guideline 5.0.0 - General	South Korea	2
Guideline 5.0.0 - General	Germany	2
Guideline 5.0.0 - General	United Arab Emirates	2
Guideline 5.0.0 - General	Saudi Arabia	1
Guideline 5.0.0 - General	Seychelles	1
Guideline 5.0.0 - General	Türkiye	1
Guideline 5.0.0 - General	Ukraine	1
Guideline 5.0.0 - General	Georgia	1
Guideline 5.0.0 - General	Canada	1
Guideline 5.0.0 - General	Belarus	1
Guideline 5.0.0 - General	Belgium	1
Guideline 5.0.0 - General	British Virgin Islands	1
Guideline 5.0.0 - General	Poland	1
Guideline 5.0.0 - General	Oman	1
Guideline 5.0.0 - General	Malta	1
Guideline 5.0.0 - General	Japan	1
Guideline 5.0.0 - General	Ireland	1
Guideline 5.0.0 - General	Hong Kong	1
Guideline 5.0.0 - General	Hungary	1
Guideline 5.2.1 - Intellectual Property - General	Total	77
Guideline 5.2.1 - Intellectual Property - General	Brazil	70
Guideline 5.2.1 - Intellectual Property - General	China mainland	4
Guideline 5.2.1 - Intellectual Property - General	United States	1
Guideline 5.2.1 - Intellectual Property - General	United Kingdom	1
Guideline 5.2.1 - Intellectual Property - General	Hong Kong	1
Guideline 3.1.2 - Subscriptions	Total	69
Guideline 3.1.2 - Subscriptions	China mainland	54
Guideline 3.1.2 - Subscriptions	Vietnam	3
Guideline 3.1.2 - Subscriptions	Pakistan	2
Guideline 3.1.2 - Subscriptions	Ukraine	2
Guideline 3.1.2 - Subscriptions	United Kingdom	1
Guideline 3.1.2 - Subscriptions	United States	1
Guideline 3.1.2 - Subscriptions	Thailand	1
Guideline 3.1.2 - Subscriptions	South Korea	1
Guideline 3.1.2 - Subscriptions	Serbia	1
Guideline 3.1.2 - Subscriptions	Denmark	1
Guideline 3.1.2 - Subscriptions	Cyprus	1
Guideline 3.1.2 - Subscriptions	Türkiye	1
Guideline 1.1.0 - General	Total	56
Guideline 1.1.0 - General	China mainland	10
Guideline 1.1.0 - General	Türkiye	8
Guideline 1.1.0 - General	United States	6
Guideline 1.1.0 - General	United Kingdom	6
Guideline 1.1.0 - General	Hong Kong	5
Guideline 1.1.0 - General	Singapore	4
Guideline 1.1.0 - General	Cyprus	2
Guideline 1.1.0 - General	India	2
Guideline 1.1.0 - General	Thailand	1
Guideline 1.1.0 - General	United Arab Emirates	1

Guideline 1.1.0 - General	Vietnam	1
Guideline 1.1.0 - General	Pakistan	1
Guideline 1.1.0 - General	Netherlands	1
Guideline 1.1.0 - General	Mexico	1
Guideline 1.1.0 - General	Japan	1
Guideline 1.1.0 - General	Italy	1
Guideline 1.1.0 - General	Israel	1
Guideline 1.1.0 - General	Egypt	1
Guideline 1.1.0 - General	Croatia	1
Guideline 1.1.0 - General	Belarus	1
Guideline 1.1.0 - General	Latvia	1
Guideline 2.1.0 - App Completeness	Total	48
Guideline 2.1.0 - App Completeness	China mainland	17
Guideline 2.1.0 - App Completeness	United States	6
Guideline 2.1.0 - App Completeness	Türkiye	5
Guideline 2.1.0 - App Completeness	Vietnam	4
Guideline 2.1.0 - App Completeness	Russia	2
Guideline 2.1.0 - App Completeness	Cyprus	2
Guideline 2.1.0 - App Completeness	United Arab Emirates	2
Guideline 2.1.0 - App Completeness	Germany	2
Guideline 2.1.0 - App Completeness	South Korea	1
Guideline 2.1.0 - App Completeness	Saudi Arabia	1
Guideline 2.1.0 - App Completeness	Nigeria	1
Guideline 2.1.0 - App Completeness	Malaysia	1
Guideline 2.1.0 - App Completeness	Canada	1
Guideline 2.1.0 - App Completeness	Belarus	1
Guideline 2.1.0 - App Completeness	Anguilla	1
Guideline 2.1.0 - App Completeness	Armenia	1
Guideline 2.3.1 - Hidden or undocumented features	Total	41
Guideline 2.3.1 - Hidden or undocumented features	China mainland	6
Guideline 2.3.1 - Hidden or undocumented features	Vietnam	4
Guideline 2.3.1 - Hidden or undocumented features	Hong Kong	4
Guideline 2.3.1 - Hidden or undocumented features	India	3
Guideline 2.3.1 - Hidden or undocumented features	United Kingdom	3
Guideline 2.3.1 - Hidden or undocumented features	Ukraine	3
Guideline 2.3.1 - Hidden or undocumented features	Russia	2
Guideline 2.3.1 - Hidden or undocumented features	Germany	2
Guideline 2.3.1 - Hidden or undocumented features	Türkiye	2
Guideline 2.3.1 - Hidden or undocumented features	Spain	2
Guideline 2.3.1 - Hidden or undocumented features	Uzbekistan	1
Guideline 2.3.1 - Hidden or undocumented features	Georgia	1
Guideline 2.3.1 - Hidden or undocumented features	United States	1
Guideline 2.3.1 - Hidden or undocumented features	Pakistan	1
Guideline 2.3.1 - Hidden or undocumented features	Montenegro	1
Guideline 2.3.1 - Hidden or undocumented features	Luxembourg	1
Guideline 2.3.1 - Hidden or undocumented features	Italy	1
Guideline 2.3.1 - Hidden or undocumented features	Indonesia	1
Guideline 2.3.1 - Hidden or undocumented features	Ecuador	1
Guideline 2.3.1 - Hidden or undocumented features	Australia	1
Guideline 2.5.18 - Advertisements	Total	32
Guideline 2.5.18 - Advertisements	Vietnam	8
Guideline 2.5.18 - Advertisements	China mainland	5
Guideline 2.5.18 - Advertisements	Germany	2

Guideline 2.5.18 - Advertisements	United States	2
Guideline 2.5.18 - Advertisements	Türkiye	2
Guideline 2.5.18 - Advertisements	Spain	2
Guideline 2.5.18 - Advertisements	Singapore	2
Guideline 2.5.18 - Advertisements	India	2
Guideline 2.5.18 - Advertisements	Belarus	1
Guideline 2.5.18 - Advertisements	Cyprus	1
Guideline 2.5.18 - Advertisements	Latvia	1
Guideline 2.5.18 - Advertisements	Japan	1
Guideline 2.5.18 - Advertisements	Israel	1
Guideline 2.5.18 - Advertisements	Hong Kong	1
Guideline 2.5.18 - Advertisements	Pakistan	1
Guideline 3.1.1 - In-App Purchase	Total	29
Guideline 3.1.1 - In-App Purchase	China mainland	15
Guideline 3.1.1 - In-App Purchase	India	3
Guideline 3.1.1 - In-App Purchase	United States	2
Guideline 3.1.1 - In-App Purchase	Hong Kong	2
Guideline 3.1.1 - In-App Purchase	Singapore	2
Guideline 3.1.1 - In-App Purchase	Türkiye	1
Guideline 3.1.1 - In-App Purchase	Spain	1
Guideline 3.1.1 - In-App Purchase	Canada	1
Guideline 3.1.1 - In-App Purchase	British Virgin Islands	1
Guideline 3.1.1 - In-App Purchase	Indonesia	1
Guideline 1.1.6 - False information and features	Total	23
Guideline 1.1.6 - False information and features	China mainland	8
Guideline 1.1.6 - False information and features	Morocco	2
Guideline 1.1.6 - False information and features	United Arab Emirates	2
Guideline 1.1.6 - False information and features	Ukraine	2
Guideline 1.1.6 - False information and features	Pakistan	2
Guideline 1.1.6 - False information and features	Estonia	1
Guideline 1.1.6 - False information and features	Vietnam	1
Guideline 1.1.6 - False information and features	Türkiye	1
Guideline 1.1.6 - False information and features	Japan	1
Guideline 1.1.6 - False information and features	Italy	1
Guideline 1.1.6 - False information and features	Israel	1
Guideline 1.1.6 - False information and features	Georgia	1
Guideline 2.3.7 - App name and keywords	Total	22
Guideline 2.3.7 - App name and keywords	China mainland	14
Guideline 2.3.7 - App name and keywords	United Kingdom	2
Guideline 2.3.7 - App name and keywords	Singapore	2
Guideline 2.3.7 - App name and keywords	Vietnam	1
Guideline 2.3.7 - App name and keywords	Germany	1
Guideline 2.3.7 - App name and keywords	Georgia	1
Guideline 2.3.7 - App name and keywords	Romania	1
Guideline 1.1.4 - Sexual and pornographic content	Total	16
Guideline 1.1.4 - Sexual and pornographic content	China mainland	6
Guideline 1.1.4 - Sexual and pornographic content	United States	2
Guideline 1.1.4 - Sexual and pornographic content	Japan	2
Guideline 1.1.4 - Sexual and pornographic content	Türkiye	1
Guideline 1.1.4 - Sexual and pornographic content	Cyprus	1
Guideline 1.1.4 - Sexual and pornographic content	Hong Kong	1
Guideline 1.1.4 - Sexual and pornographic content	India	1
Guideline 1.1.4 - Sexual and pornographic content	Kazakhstan	1

Guideline 1.1.4 - Sexual and pornographic content	Pakistan	1
Guideline 3.1.5 - Cryptocurrencies	Total	16
Guideline 3.1.5 - Cryptocurrencies	United States	3
Guideline 3.1.5 - Cryptocurrencies	Pakistan	2
Guideline 3.1.5 - Cryptocurrencies	United Kingdom	2
Guideline 3.1.5 - Cryptocurrencies	Tanzania	1
Guideline 3.1.5 - Cryptocurrencies	Poland	1
Guideline 3.1.5 - Cryptocurrencies	Nigeria	1
Guideline 3.1.5 - Cryptocurrencies	Iraq	1
Guideline 3.1.5 - Cryptocurrencies	Hong Kong	1
Guideline 3.1.5 - Cryptocurrencies	Bulgaria	1
Guideline 3.1.5 - Cryptocurrencies	Singapore	1
Guideline 3.1.5 - Cryptocurrencies	Russia	1
Guideline 3.1.5 - Cryptocurrencies	Türkiye	1
Guideline 5.0.0 - Legal	Total	14
Guideline 5.0.0 - Legal	China mainland	7
Guideline 5.0.0 - Legal	United States	2
Guideline 5.0.0 - Legal	Argentina	2
Guideline 5.0.0 - Legal	South Korea	1
Guideline 5.0.0 - Legal	Hong Kong	1
Guideline 5.0.0 - Legal	Canada	1
Guideline 1.2.0 - User-generated content	Total	14
Guideline 1.2.0 - User-generated content	United States	3
Guideline 1.2.0 - User-generated content	Singapore	2
Guideline 1.2.0 - User-generated content	South Korea	2
Guideline 1.2.0 - User-generated content	Russia	1
Guideline 1.2.0 - User-generated content	Ukraine	1
Guideline 1.2.0 - User-generated content	United Arab Emirates	1
Guideline 1.2.0 - User-generated content	Netherlands	1
Guideline 1.2.0 - User-generated content	India	1
Guideline 1.2.0 - User-generated content	Germany	1
Guideline 1.2.0 - User-generated content	China mainland	1
Guideline 5.2.3 - Audio/video downloading	Total	14
Guideline 5.2.3 - Audio/video downloading	India	3
Guideline 5.2.3 - Audio/video downloading	China mainland	3
Guideline 5.2.3 - Audio/video downloading	Türkiye	2
Guideline 5.2.3 - Audio/video downloading	Poland	1
Guideline 5.2.3 - Audio/video downloading	Morocco	1
Guideline 5.2.3 - Audio/video downloading	Lebanon	1
Guideline 5.2.3 - Audio/video downloading	Japan	1
Guideline 5.2.3 - Audio/video downloading	Italy	1
Guideline 5.2.3 - Audio/video downloading	Germany	1
Guideline 5.1.2 - Data use & sharing	Total	13
Guideline 5.1.2 - Data use & sharing	India	1
Guideline 5.1.2 - Data use & sharing	Nigeria	1
Guideline 5.1.2 - Data use & sharing	Philippines	1
Guideline 5.1.2 - Data use & sharing	Türkiye	1
Guideline 5.1.2 - Data use & sharing	United States	1
Guideline 5.1.2 - Data use & sharing	Dominican Republic	1
Guideline 5.1.2 - Data use & sharing	China mainland	4
Guideline 5.1.2 - Data use & sharing	Cyprus	1
Guideline 5.1.2 - Data use & sharing	Japan	1
Guideline 5.1.2 - Data use & sharing	Mexico	1

Guideline 2.3.6 - App rating	Total	13
Guideline 2.3.6 - App rating	United States	4
Guideline 2.3.6 - App rating	Cyprus	2
Guideline 2.3.6 - App rating	Armenia	1
Guideline 2.3.6 - App rating	China mainland	1
Guideline 2.3.6 - App rating	Germany	1
Guideline 2.3.6 - App rating	Hong Kong	1
Guideline 2.3.6 - App rating	Oman	1
Guideline 2.3.6 - App rating	Singapore	1
Guideline 2.3.6 - App rating	Ukraine	1
Guideline 5.1.1 - Data collection & storage	Total	12
Guideline 5.1.1 - Data collection & storage	United States	2
Guideline 5.1.1 - Data collection & storage	Brazil	2
Guideline 5.1.1 - Data collection & storage	Israel	1
Guideline 5.1.1 - Data collection & storage	Singapore	1
Guideline 5.1.1 - Data collection & storage	Spain	1
Guideline 5.1.1 - Data collection & storage	Sweden	1
Guideline 5.1.1 - Data collection & storage	France	1
Guideline 5.1.1 - Data collection & storage	Denmark	1
Guideline 5.1.1 - Data collection & storage	China mainland	1
Guideline 5.1.1 - Data collection & storage	Russia	1
Guideline 2.5.1 - API Usage	Total	11
Guideline 2.5.1 - API Usage	India	4
Guideline 2.5.1 - API Usage	China mainland	3
Guideline 2.5.1 - API Usage	Bangladesh	1
Guideline 2.5.1 - API Usage	Brazil	1
Guideline 2.5.1 - API Usage	Hong Kong	1
Guideline 2.5.1 - API Usage	Moldova	1
Guideline 3.2.2 - Unacceptable	Total	11
Guideline 3.2.2 - Unacceptable	China mainland	2
Guideline 3.2.2 - Unacceptable	United Arab Emirates	1
Guideline 3.2.2 - Unacceptable	United Kingdom	1
Guideline 3.2.2 - Unacceptable	Vanuatu	1
Guideline 3.2.2 - Unacceptable	Ukraine	1
Guideline 3.2.2 - Unacceptable	Taiwan	1
Guideline 3.2.2 - Unacceptable	Seychelles	1
Guideline 3.2.2 - Unacceptable	Saint Vincent and the Grenadines	1
Guideline 3.2.2 - Unacceptable	India	1
Guideline 3.2.2 - Unacceptable	Hong Kong	1
Guideline 3.2.1 - Acceptable	Total	11
Guideline 3.2.1 - Acceptable	United States	4
Guideline 3.2.1 - Acceptable	India	4
Guideline 3.2.1 - Acceptable	United Kingdom	1
Guideline 3.2.1 - Acceptable	China mainland	1
Guideline 3.2.1 - Acceptable	Hong Kong	1
Guideline 4.2.0 - Minimum Functionality	Total	10
Guideline 4.2.0 - Minimum Functionality	Ukraine	3
Guideline 4.2.0 - Minimum Functionality	Türkiye	1
Guideline 4.2.0 - Minimum Functionality	United Kingdom	1
Guideline 4.2.0 - Minimum Functionality	Pakistan	1
Guideline 4.2.0 - Minimum Functionality	Cyprus	1
Guideline 4.2.0 - Minimum Functionality	China mainland	1
Guideline 4.2.0 - Minimum Functionality	Brazil	1

Guideline 4.2.0 - Minimum Functionality	Australia	1
Guideline 5.4 - VPN Apps	Total	10
Guideline 5.4 - VPN Apps	China mainland	4
Guideline 5.4 - VPN Apps	United Kingdom	2
Guideline 5.4 - VPN Apps	United States	2
Guideline 5.4 - VPN Apps	Vietnam	1
Guideline 5.4 - VPN Apps	Finland	1
Guideline 5.2.2 - 3rd party TMs	Total	8
Guideline 5.2.2 - 3rd party TMs	China mainland	2
Guideline 5.2.2 - 3rd party TMs	United Arab Emirates	1
Guideline 5.2.2 - 3rd party TMs	Vietnam	1
Guideline 5.2.2 - 3rd party TMs	India	1
Guideline 5.2.2 - 3rd party TMs	Pakistan	1
Guideline 5.2.2 - 3rd party TMs	Singapore	1
Guideline 5.2.2 - 3rd party TMs	Sweden	1
Guideline 5.3.4 - Real money gaming requirements	Total	7
Guideline 5.3.4 - Real money gaming requirements	United States	2
Guideline 5.3.4 - Real money gaming requirements	Laos	1
Guideline 5.3.4 - Real money gaming requirements	Ukraine	1
Guideline 5.3.4 - Real money gaming requirements	Hong Kong	1
Guideline 5.3.4 - Real money gaming requirements	British Virgin Islands	1
Guideline 5.3.4 - Real money gaming requirements	Spain	1
Guideline 2.5.2 - Apps should be self-contained	Total	5
Guideline 2.5.2 - Apps should be self-contained	United Kingdom	1
Guideline 2.5.2 - Apps should be self-contained	Vietnam	1
Guideline 2.5.2 - Apps should be self-contained	China mainland	1
Guideline 2.5.2 - Apps should be self-contained	Russia	1
Guideline 2.5.2 - Apps should be self-contained	Singapore	1
Guideline 1.5.0 - Developer Information	Total	5
Guideline 1.5.0 - Developer Information	Japan	2
Guideline 1.5.0 - Developer Information	United States	1
Guideline 1.5.0 - Developer Information	Sweden	1
Guideline 1.5.0 - Developer Information	India	1
Guideline 5.6.2 - Developer Identity	Total	4
Guideline 5.6.2 - Developer Identity	United States	4
Guideline 2.3.3 - Relevant screenshots	Total	3
Guideline 2.3.3 - Relevant screenshots	Canada	1
Guideline 2.3.3 - Relevant screenshots	China mainland	1
Guideline 2.3.3 - Relevant screenshots	Sweden	1
Guideline 1.4.3 - Promotes excessive consumption of alcohol	Total	3
Guideline 1.4.3 - Promotes excessive consumption of alcohol	United States	1
Guideline 1.4.3 - Promotes excessive consumption of alcohol	Germany	1
Guideline 1.4.3 - Promotes excessive consumption of alcohol	Georgia	1
Guideline 3.0.0 - General	Total	3
Guideline 3.0.0 - General	China mainland	2
Guideline 3.0.0 - General	Israel	1
Guideline 2.3.10 - Other mobile platforms/development process	Total	3
Guideline 2.3.10 - Other mobile platforms/development process	Spain	1
Guideline 2.3.10 - Other mobile platforms/development process	Jordan	1
Guideline 2.3.10 - Other mobile platforms/development process	Hong Kong	1
Guideline 4.2.2 - Marketing materials and content aggregation	Total	2
Guideline 4.2.2 - Marketing materials and content aggregation	Türkiye	1
Guideline 4.2.2 - Marketing materials and content aggregation	Brazil	1

Guideline 4.8 Design: Login Services	Total	2
Guideline 4.8 Design: Login Services	China mainland	1
Guideline 4.8 Design: Login Services	Japan	1
Guideline 1.4.0 - BAC calculators	Total	2
Guideline 1.4.0 - BAC calculators	Germany	1
Guideline 1.4.0 - BAC calculators	United States	1
Guideline 5.2.5 - Apple products	Total	2
Guideline 5.2.5 - Apple products	Pakistan	1
Guideline 5.2.5 - Apple products	China mainland	1
Guideline 5.6.1 - App Store Reviews	Total	1
Guideline 5.6.1 - App Store Reviews	Russia	1
Guideline 1.4.2 - Drug dosage	Total	1
Guideline 1.4.2 - Drug dosage	Egypt	1
Guideline 4.10 - Monetizing Built-In Capabilities	Total	1
Guideline 4.10 - Monetizing Built-In Capabilities	China mainland	1
Guideline 4.5.4 - Push notification requirements	Total	1
Guideline 4.5.4 - Push notification requirements	United States	1
Guideline 2.3.8 - Age-appropriate metadata and metadata s	Total	1
Guideline 2.3.8 - Age-appropriate metadata and metadata s	China mainland	1
Guideline 1.6.0 - Data Security	Total	1
Guideline 1.6.0 - Data Security	Lithuania	1
Guideline 1.7.0 - Reporting Criminal Activity	Total	1
Guideline 1.7.0 - Reporting Criminal Activity	Italy	1
Guideline 2.2.0 - Beta Testing	Total	1
Guideline 2.2.0 - Beta Testing	Netherlands	1
Guideline 2.3.0 - Accurate Metadata	Total	1
Guideline 2.3.0 - Accurate Metadata	United Kingdom	1
Guideline 2.3.2 - Supplemental content and promoted IAP m	Total	1
Guideline 2.3.2 - Supplemental content and promoted IAP m	Ukraine	1
Guideline 1.1.2 - Violence	Total	1
Guideline 1.1.2 - Violence	France	1

EXHIBIT JJ



Mark Zuckerberg would come to the Oval Office to see me. He would bring his very nice wife to dinners, be as nice as anyone could be, while always plotting to install shameful Lock Boxes in a true PLOT AGAINST THE PRESIDENT.

He told me that there was nobody like Trump on Facebook. But at the same time, and for whatever reason, steered it against me.

We are watching him closely, and if he does anything illegal this time he will spend the rest of his life in prison - as will others who cheat in the 2024 Presidential Election.

EXHIBIT KK



Attorney General Pamela Bondi  

@AGPamBondi



Today following outreach from [@thejusticedept](#), Facebook removed a large group page that was being used to dox and target [@ICEgov](#) agents in Chicago.

The wave of violence against ICE has been driven by online apps and social media campaigns designed to put ICE officers at risk just for doing their jobs. The Department of Justice will continue engaging tech companies to eliminate platforms where radicals can incite imminent violence against federal law enforcement.

Last edited 10:23 AM · Oct 14, 2025 · **2M** Views

EXHIBIT LL



Secretary Kristi Noem  

@Sec_Noem



Anti-ICE radicals are using social media apps to dox, threaten, and terrorize the brave men and women of ICE and their families.

Today, thanks to @POTUS Trump's @TheJusticeDept under the leadership of @AGPamBondi, Facebook removed a large page being used to dox and threaten our ICE agents in Chicago.

These officers risk their lives every day arresting murderers, rapists, and gang members to protect our homeland. Platforms like Facebook must be PROACTIVE in stopping the doxxing of our @ICEgov law enforcement.

We will prosecute those who dox our agents to the fullest extent of the law.

3:32 PM · Oct 14, 2025 · **190K** Views

EXHIBIT MM

[Home](#) > [Enforcement](#) > [Taking Action](#) > [Removing Pages Groups](#)

Removing Pages and groups

UPDATED NOV 12, 2024

Meta will remove Pages and groups that repeatedly violate the [Community Standards](#). This includes:

- If the name, description or cover photo of a Page or group violates our Community Standards.
- If an admin of a Page or group creates content, such as posts, comments or rooms, that violates our Community Standards.
- If a group moderator creates content that violates our Community Standards.
- If a group admin or moderator approves violating content from a group member.

With [Page Quality](#) and [Group Quality](#), you can see exactly when we removed a piece of content from your Page or group, along with what policy it violated.

We'll notify you when we disable a Page or group you manage. We'll also let you know whether you can request another review if you believe we made a mistake.



Policies

[Community Standards](#)

[Meta Advertising Standards](#)

[Other policies](#)

[How Meta improves](#)

Enforcement

[Detecting violations](#)

[Taking action](#)

Governance

Features

Our approach to dangerous organizations and individuals

Our approach to the opioid epidemic

Our approach to elections

Our approach to misinformation

Our approach to newsworthy content

Our approach to Facebook Feed ranking

Our approach to explaining ranking

Accessibility at Meta

AI at Meta: Transparency about our training data

How to appeal to the Oversight Board

Oversight Board cases

Oversight Board recommendations

Creating the Oversight Board

Oversight Board: Further asked questions

Meta's Bi-Annual Updates on the Oversight Board

Tracking the Oversight Board's Impact

Research tools

Content Library and Content Library API

Ad Library Tools

Other research tools and data catalogue

Security

Threat disruptions

Security threats

Threat reporting

Reports

Community Standards Enforcement Report

Intellectual Property

Government Requests for User Data

Content Restrictions Based on Local Law

Internet Disruptions

Widely Viewed Content Report

Regulatory and Other Transparency Reports

[English \(US\)](#)

[Privacy Policy](#)

[Terms of Service](#)

[Cookies](#)

EXHIBIT NN

Home > Policies > Community Standards > Coordinating Harm Promoting Crime

Coordinating Harm and Promoting Crime

[Policy Details](#) [User Experiences](#)

Policy details

CHANGE LOG

Today

Jun 26, 2025

Feb 27, 2025

Dec 5, 2023

Policy Rationale

In an effort to prevent and disrupt offline harm and copycat behavior, we prohibit people from facilitating, organizing, promoting or admitting to certain criminal or harmful activities targeted at people, businesses, property or animals. We allow people to debate and advocate for the legality of criminal and harmful activities, as well as draw attention to harmful or criminal activity that they may witness or experience as long as they do not advocate for or coordinate harm.



We Remove:

Harm against people

- Outing: exposing the identity or locations affiliated with anyone who is alleged to:
 - Be a member of an outing-risk group; and/or
 - Share familial and/or romantic relationships with a member(s) of an outing-risk group; and/or
 - Have performed professional activities in support of an outing-risk group (except for political figures)
- Outing the undercover status of law enforcement, military, or security personnel if the content contains the agent's name, their face or badge and any of the following:
 - The agent's law enforcement organization
 - The agent's law enforcement operation
 - Explicit mentions of their undercover status
- Coordinating, threatening, supporting, or admitting to swatting except in the context of awareness raising or condemnation, fictional or staged settings or redemption.
- Depicting, promoting, advocating for or encouraging participation in a high-risk viral challenge except in the context of awareness raising or condemnation. Where imagery is depicted in these contexts, we include a label so that people are aware that the content may be sensitive.

Harm against animals

- Coordinating, threatening, supporting or admitting to acts of physical harm against animals (in written, visual or verbal form) except in cases of:
 - Awareness-raising or condemnation
 - Redemption
 - Survival or defense of self, another human or another animal
 - Fictional or staged settings EXCEPT where it depicts staged animal fights or fake animal rescues
 - Hunting or fishing
 - Religious sacrifice
 - Food preparation or processing
 - Pests or vermin

- Mercy killing
- Bullfighting
- Coordinating, threatening, supporting, depicting or admitting to staged animal fights or depicting video imagery of fake animal rescues except in the context of awareness raising or condemnation or redemption.

Harm against property

- Coordinating, threatening, supporting or admitting to vandalism, or theft or malicious hacking (in written, visual or verbal form) , except in the context of
 - Awareness raising or condemnation,
 - Redemption,
 - Fictional or staged settings,
 - Admitting in the context of defense of self, or another human
 - depicting vandalism in protest context,
 - depicting graffiti, or
 - speaking positively about vandalism and theft committed by others.

Voter and/or census fraud

- Offers to buy or sell votes with cash, gifts, services or other material goods, except if shared in condemning, awareness raising, news reporting, or humorous or satirical contexts.
- Advocating, providing instructions for, or demonstrating explicit intent to illegally participate in a voting (for example, voting twice or fabricating your voting eligibility) or census process (for example, misrepresenting demographic information or how many people are in your household), except if shared in condemning, awareness raising, news reporting, or humorous or satirical contexts.



For the following content, we include a label so that people are aware the content may be sensitive:

- Imagery depicting a high-risk viral challenge if shared condemning or raising awareness of the associated risks.



For the following Community Standards, we require additional information and/or context to enforce:

We Remove:

- Outing: exposing the identity of a person and putting them at risk of harm:
 - LGBTQIA+ members
 - Unveiled women
 - Non-convicted individuals as predators in the context of a sexual predator Sting Operation
 - Individuals involved in legal cases, when their involvement is restricted from public disclosure
 - Witnesses, informants, , activists, detained persons or hostages
 - Defectors, when reported by credible government channel
 - Prisoners of war, in the context of an armed conflict
- Imagery that is likely to deceive the public as to its origin if:
 - The entity depicted or an authorized representative objects to the imagery, and
 - The imagery has the potential to cause harm to members of the public.
- Statement of intent, call to action, or encouragement to either:
 - Block access to essential services when there is confirmation or publicly available confirmation that emergency vehicles are blocked, OR
 - Target an individual or specific group of people by blocking their access to essential services or unobstructed passage in a way that may threaten their safety
- Voter or census interference, including:
 - Calls for coordinated interference that would affect an individual's ability to participate in an official election or census.
 - Claims that voting or census participation may or will result in law enforcement consequences (for example, arrest, deportation or imprisonment).
 - Threats to go to an election site to monitor or watch voters or election officials' activities if combined with a reference to intimidation (e.g., "Let's show them who's boss!", "They want a war? We'll give them a war.").

- Threats to go to a post-election activity site if combined with a reference to intimidation (e.g., “Let’s show them who's boss!”, “They want a war? We’ll give them a war.”).

This policy has been updated to remove all references to the coordination of malicious hacking and consolidate relevant policies under the Cybersecurity policy.

User experiences

See some examples of what enforcement looks like for people on Facebook, such as: what it looks like to report something you don’t think should be on Facebook, to be told you’ve violated our Community Standards and to see a warning screen over certain content.

Note: We’re always improving, so what you see here may be slightly outdated compared to what we currently use.

USER EXPERIENCE

Reporting



USER EXPERIENCE

Post-report communication



USER EXPERIENCE

Takedown experience

USER EXPERIENCE

Warning screens

EXHIBIT OO

Everyone deserves trustworthy local reporting. You help make that happen.

Log In



Donate



IMMIGRATION NEWS CHICAGO

Facebook suspends popular Chicago ICE-sightings group at Trump administration's request

The group ICE Sighting-Chicago has been increasingly used in the last five weeks of President Donald Trump's intense deportation campaign to warn neighbors that federal agents are nearby.

By Nader Issa | Oct 14, 2025, 1:53pm EST



U.S. Attorney General Pam Bondi said Tuesday that Facebook had suspended a group "that was being used to dox and target ICE agents in Chicago." AP

At the request of the U.S. Department of Justice, a Facebook group used by nearly 80,000 people to report sightings of federal immigration agents in the Chicago area has been taken down by the social media giant Meta, Facebook's parent company.

The group, called ICE Sighting-Chicagoland, has been increasingly used over the last five weeks of "Operation Midway Blitz," President Donald Trump's intense deportation campaign, to warn neighbors that federal agents are near schools, grocery stores and other community locations so they can take steps to protect themselves.

But the Trump administration has claimed that its agents — nearly all of whom wear face coverings, don't wear badges and at times **drive vehicles without license plates** — are "under attack." "Today, following outreach from the DOJ, Facebook removed a large group page that was

being

used to dox and target ICE agents in Chicago," U.S. Attorney General Pam Bondi said in a statement Tuesday. "The wave of violence against ICE has been driven by online apps and social

media campaigns

designed to put ICE officers at risk just for doing their jobs," Bondi said. "The Department of Justice will continue engaging tech companies to eliminate platforms where radicals can incite violence against federal law enforcement."

The suspension came two days after far-right political activist and Trump ally Laura Loomer **posted on X** about the group, claiming "ICE tracking apps and ICE tracking accounts are getting people killed." "You'd think other Big Tech executives would use this as an opportunity to be in

compliance and

to support President Trump's immigration policies, but they aren't," Loomer posted. She accused Meta CEO Mark Zuckerberg of "leftist subversion of Trump and his policies" and suggested he should be "contacted by the DOJ."

The Facebook group had about 76,000 members. Its administrator posted screenshots of messages from Meta that said the group was suspended "because it didn't follow our Community Standards." The account had not previously been restricted or flagged, the administrator said.

Meta spokesperson Francis Brennan said, "This Group was removed for violating our policies against coordinated harm."

Brennan pointed to the social media platform's "Coordinating Harm and Promoting Crime" policy, which bans "outing the undercover status of law enforcement, military, or security personnel if the content contains the agent's name, their face or badge and any of the following: The agent's law enforcement organization, the agent's law enforcement operation [or] explicit mentions of their undercover status."

Meta updated that policy in December 2023 as the presidential campaign got underway. It previously only banned information about undercover law enforcement operations that contained an agent's full name or other explicit identification, or photos that showed agents' faces and explicitly mentioned that they were undercover.

Asked to confirm that the Justice Department requested the page be taken down, Brennan declined to comment and directed the Chicago Sun-Times to Bondi's statement. He also wouldn't say if Meta planned to go after several other Facebook groups with similar content.

Brennan was a **2020 Trump campaign adviser** whom Meta hired in January **after Trump's election** to a second term.

The feds have cited a "1,000% increase" in attacks against U.S. Immigration and Customs Enforcement officers, but there have been few examples provided of federal immigration agents being seriously hurt in the Chicago area.

The Department of Homeland Security reported that one ICE officer was "seriously injured" during a traffic stop in suburban Franklin Park that ended with the officer **fatally shooting 38-year-old father Silverio Villegas González**. But the Sun-Times later obtained body-camera footage from local police that showed the officer said his injuries were "**nothing major**."

Another immigration agent hurt his leg chasing a protester outside the west suburban Broadview immigration facility.

Loomer, the far-right activist, has also taken credit for prompting Apple and Google to remove two popular ICE-sighting apps — ICEBlock and Red Dot — from their app stores.

"We are incredibly disappointed by Apple's actions," ICEBlock said in a statement after the removal. "Capitulating to an authoritarian regime is never the right move. Apple has claimed they received information from law enforcement that ICEBlock served to harm law enforcement officers. This is patently false.

"ICEBlock is no different from crowd-sourcing speed traps, which every notable mapping application, including Apple's own Maps app, implements as part of its core services. This is protected speech under the First Amendment of the United States Constitution."

Ed Yohnka, spokesman for ACLU of Illinois, said it’s “troubling to see high-ranking government officials boast of blocking social media pages that seek to instill a modicum of accountability for the actions of federal agents.

“Whether attacking late-night talk show hosts or people who oppose their brutal immigration policies, this administration revels in squelching speech with which they disagree or which informs people about how to protect their rights,” he said.

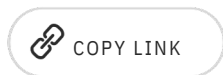
Facebook and other platforms have come under attack by Trump and right-wing circles in the last decade with accusations that their policies favor Democrats and left-leaning politics by moderating hate speech and misinformation.

Twitter, now known as X, was bought in 2022 by billionaire Elon Musk, who poured \$288 million into Trump’s 2024 campaign. Musk has since reshaped the platform and its content policies. Zuckerberg, meanwhile, has tried repairing Meta’s relationship with Trump and conservatives.

He wrote in a letter to the U.S. House Judiciary Committee last year that former President Joe Biden’s administration “repeatedly pressured our teams for months to censor certain COVID-19 content.”

“I believe the government pressure was wrong, and I regret that we were not more outspoken about it,” Zuckerberg wrote in August 2024. “I feel strongly that we should not compromise our content standards due to pressure from any administration in either direction — and we’re ready to push back if something like this happens again.”

Contributing: Kade Heather



Nader Issa

Chicago Sun-Times•Assistant editor/reporter, race, class and communities

EXHIBIT PP



DOMESTIC ABUSER ARRESTED IN MINNESOTA

Jesus Alberto Najera Buenosaires was arrested during a targeted operation near 160th Ave. in Milaca, MN, Jan. 19.

He was convicted of domestic violence, but his 90-day sentence was suspended.

He has a current protective order against him due to his violence against a woman.



EXHIBIT QQ



U.S. Immigration and Customs Enforcement

@ICEgov



Your voice matters. If Florida can partner with us, so can your state. Ask your local police to partner with ICE.

Learn more: [ICE.gov/287g](https://ice.gov/287g)



FLHSMV @FLHSMV · Jun 6, 2025

Your Florida Highway Patrol in the Tampa region pulled over a van with 11 illegal immigrants. Thanks to the near 1,800 Troopers certified under the 287(g) program, we're making sure Florida is not a sanctuary for criminals.



5:02 PM · Jun 10, 2025 · **328.5K** Views

EXHIBIT RR



U.S. Immigration and Customs Enforcement

@ICEgov



Members of the California National guard stand watch at the Edward R. Roybal federal building in Los Angeles.



11:55 PM · Jun 11, 2025 · **29.3K** Views

EXHIBIT SS

**Press Conference Held by Donald Trump
in Palm Beach, Florida, on January 7, 2025**

[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]

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

KASSANDRA ROSADO and KREISAU GROUP
LLC,

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as
Attorney General, and

KRISTI NOEM, in her official capacity as Secretary
of Homeland Security,

Defendants.

Civil Action No.: 1:26-cv-01532

Hon. Jorge L. Alonso

**DECLARATION OF KASSANDRA ROSADO IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

I, Kassandra Rosado, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration.
2. Attached as Exhibit A to this declaration is a true and accurate image of the description of the “ICE Sighting – Chicagoland” Facebook group as it existed when the group was suspended.
3. Attached as Exhibit B to this declaration is a true and accurate image of the rules of the “ICE Sighting – Chicagoland” Facebook group as they existed when the group was suspended.
4. Attached as Exhibits C1–C6 to this declaration are true and accurate images of the five notifications I received from Facebook informing me that Facebook’s moderators had

removed a post or comment from my group along with Facebook's message that these were “participant violations” that would not hurt my group.

5. Attached as Exhibit D to this declaration is a true and accurate image of a post by moderator Suz Nagy in the “ICE Sighting – Chicagoland” Facebook group on October 13, 2025, reminding members to not “post or encourage any kind of violence, threats, or illegal activity.”

6. Attached as Exhibit E to this declaration is a true and accurate image of an example of a post by an “ICE Sighting – Chicagoland” Facebook group member, sharing information about an ICE sighting on February 13, 2025.

7. Attached as Exhibit F to this declaration is a true and accurate image of an example of a post by an “ICE Sighting – Chicagoland” Facebook group member, sharing information about an ICE sighting with pictures, on September 9, 2025.

8. Attached as Exhibit G to this declaration is a true and accurate image of a post I made in the “ICE Sighting – Chicagoland” Facebook group, sharing information about a violent ICE arrest and urging better training for ICE officers, on October 8, 2025.

9. Attached as Exhibits H1–H3 to this declaration are true and accurate images of a post by an “ICE Sighting – Chicagoland” Facebook group member on October 9, 2025, commenting on and sharing a video of an ICE arrest, and comments on that post by other group members discussing the video.

10. Attached as Exhibit I to this declaration is a true and accurate image of a post by an “ICE Sighting – Chicagoland” Facebook group member sharing information about an ICE sighting on October 12, 2025.

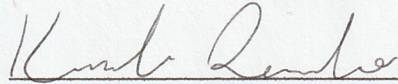
11. Attached as Exhibit J to this declaration is a true and accurate image of a post by an “ICE Sighting – Chicagoland” Facebook group member organizing a peaceful protest of ICE for veterans on October 12, 2025.

12. Attached as Exhibit K to this declaration is a true and accurate image of a post by an “ICE Sighting – Chicagoland” Facebook group member—asking for advice for her grandmother, a naturalized citizen, who was afraid to go out in public because of her ethnicity and accent—on October 13, 2025.

13. Attached as Exhibits L1 and L2 to this declaration are true and accurate images of the rationale Facebook provided me after disabling my group.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 25, 2026.



Kassandra Rosado

EXHIBIT A



ICE Sighting- Chicagoland

+ Invite

Share

About this group

Share any ICE sighting in the Chicagoland area! Let this be the centralized group everyone can be informed

U.S. CITIZENS ARE NOT COLLATORAL DAMAGE.

-Brutality and Excessive Force is not necessary to ask someone about their citizenship status.

-Local Police don't wear masks to successfully apprehend their targets, ICE agents shouldn't either.

Justice System Reform - No More Repeat Offenders - Immigration Law Reform - Path to Citizenship Improved

Investigate The Misuse of U.S. Tax Money - Transparency Requested - Invest In Emotional Healthcare for ALL - Create Self Empowerment Within our Communities

Exercising our Freedom of Speech as protected by the First Amendment of the United States Constitution.

Letter from Admin 10/11/25: "I love you guys and those that love me. Those that are on the right side of history. Those that are fighting for human rights. Who arent scared of a blended future of races. Who love the diversity of eachother and who are open minded to learning from others. THATS WHAT MAKES AMERICA GREAT. We Forgive, We Learn and We Do Better. This mission is bigger than myself." - K Rosado

Powered by U.S Citizens with Peace & LOVE. God Bless All. **See less**



Public

Anyone can see who's in the group and what they post.



Visible

Anyone can find this group.



History

Group created on January 26, 2025 **See more**



Chicago, Illinois

EXHIBIT B

Group rules from the admins

1 **No hate speech or bullying**

Make sure everyone feels safe. Bullying of any kind isn't allowed, and degrading comments about things like race, religion, culture, sexual orientation, gender or identity will not be tolerated.

2 **Respect everyone's privacy**

Being part of this group requires mutual trust. Authentic, expressive discussions make groups great, but may also be sensitive and private. What's shared in the group should stay in the group.

3 **No promotions or spam**

Give more than you take in this group. Self-promotion, spam and irrelevant links aren't allowed.

4 **Be kind and courteous**

We're all in this together. Treat everyone with respect. Healthy debates are natural, but mutual respect is required.

5 **INVITE AT LEAST 1 OTHER MEMBER**

Lets keep growing and keeping our friends informed! Invite someone to join the group.

EXHIBIT C1



Details

Oct 16, 2025

We removed a comment from your group

Why this happened

The comment may contain something that could encourage violence and lead to risk of physical harm, or a direct threat to public safety.



Ma Phil

Oct 11, 2025



We can't show this comment

Shared in ICE Sighting- Chicagoland

This goes against our Community Standards on violence and incitement.



See rule



What you need to know



How to prevent further restrictions



What this means for you



How we made this decision



Take action

EXHIBIT C2



A group participant shared a piece of content that goes against our Community Standards on violence and incitement

No one else can see this piece of content. We have these standards because we want discussions on Facebook to be respectful.

[Learn about these guidelines](#)

Notice visible until April 11

Details

The following goes against our Community Standards on violence and incitement:

Content unavailable

This content expired. To help admins moderate their group, most violating content is visible to admins for up to 90 days.

Content visible until January 11

Timeline



Quinn Fantroy shared a piece of content in the group that went against our rules on violence and incitement

Shared in ICE Sighting- Chicagoland



Facebook took it down • 3w

[Take action](#)

EXHIBIT C3



A group participant shared a piece of content that goes against our Community Standards on harassment and bullying

No one else can see this piece of content. We have these standards because we want discussions on Facebook to be respectful.

[Learn about these guidelines](#)

Notice visible until April 11

Details

The following goes against our Community Standards on harassment and bullying:

Content unavailable

This content expired. To help admins moderate their group, most violating content is visible to admins for up to 90 days.

Content visible until January 11

Timeline



Cisco J Rodriguez shared a piece of content in the group that went against our rules on harassment and bullying

Shared in ICE Sighting- Chicagoland



Facebook took it down • 3w

[Take action](#)

EXHIBIT C4



A group participant shared a comment that goes against our Community Standards on privacy violations and image privacy rights

No one else can see this comment. We have these standards because we want discussions on Facebook to be respectful.

[Learn about these guidelines](#)

Notice visible until April 9

Details

The following goes against our Community Standards on privacy violations and image privacy rights:

Comment unavailable

We are unable to show content that goes against our Community Standards on privacy violations and image privacy rights.

To protect others' privacy and keep everyone safe from harmful content, we do not show content that violates Community Standards on privacy violations and image privacy rights.

Comment visible until January 9

Timeline



A Facebook user posted a comment in the group that went against our rules on privacy violations and image privacy rights

3w • Shared in ICE Sighting- Chicagoland



Facebook took it down • 3w

[Take action](#)

EXHIBIT C5



Details

Sep 28, 2025

We removed a comment from your group

Why this happened

The comment may use language that attacks a person or group of people based on who they are.



Alex Fabricio

Sep 28, 2025

When all the spick go home
Shared in ICE Sighting- Chicagoland

This goes against our Community Standards on hateful conduct.



See rule



What you need to know



How to prevent further restrictions



What this means for you



How we made this decision



Take action

EXHIBIT C6

Other updates



These issues don't hurt your group, but you should still know about them.

Participant violations

Groups aren't penalized when members or visitors break the rules without admin approval. Still, you might want to deal with participants who could cause trouble for your group later on.
















-  **Ma Phil posted a comment in the group that went against our rules on violence and incitement** 
1w • Shared in ICE Sighting- Chicagoland
 Facebook took it down • 3d
-  **Quinn Fantroy shared a piece of content in the group that went against our rules on violence and incitement** 
Shared in ICE Sighting- Chicagoland
 Facebook took it down • 6d
-  **Cisco J Rodriguez shared a piece of content in the group that went against our rules on harassment and bullying** 
Shared in ICE Sighting- Chicagoland
 Facebook took it down • 6d
-  **A Facebook user posted a comment in the group that went against our rules on privacy violations and image privacy rights** 
2w • Shared in ICE Sighting- Chicagoland
 Facebook took it down • 1w
-  **Alex Fabricio posted a comment in the group that went against our rules on hate speech** 
3w • Shared in ICE Sighting- Chicagoland
 Facebook took it down • 3w

EXHIBIT D



Suz Nagy

October 13, 2025 · 🌐



Reminder: This page is for sharing information and sightings only. Please remember that many people, including community members and officials, follow this page. Do not post or encourage any kind of violence, threats, or illegal activity.

Let's keep this space safe, factual, and respectful for everyone.

When posting a sighting please be specific. There are people all over the city and suburbs. Give as much detailed information. Cross streets, Area of the City or if it's in a suburb. This will help a lot.

[View insights](#)

2.5K post reach >

  63

2 comments

 Like

 Share

EXHIBIT E



ICE Sighting- Chicagoland



Anonymous participant · February 13, 2025 · 🌐

ICE/homeland security at MOD pizza in kildeer checking IDs and certificates. In regular cars, no special plates and no special uniforms.

[View insights](#)

436 post reach >

2

Like

Share

EXHIBIT F



ICE Sighting- Chicagoland

Anonymous participant · September 9, 2025 · 🌐



Ice spotted in glenview around 10 trucks

2085 Tower Dr, Glenview, IL 60026

This exact location

Also spotted at Costco in glenview no pictures

2900 Patriot Blvd, Glenview, IL 60026



EXHIBIT G



Kae Rosado

Admin

Group expert



All-star contributor



+ Add topic

October 8, 2025 · 🌐



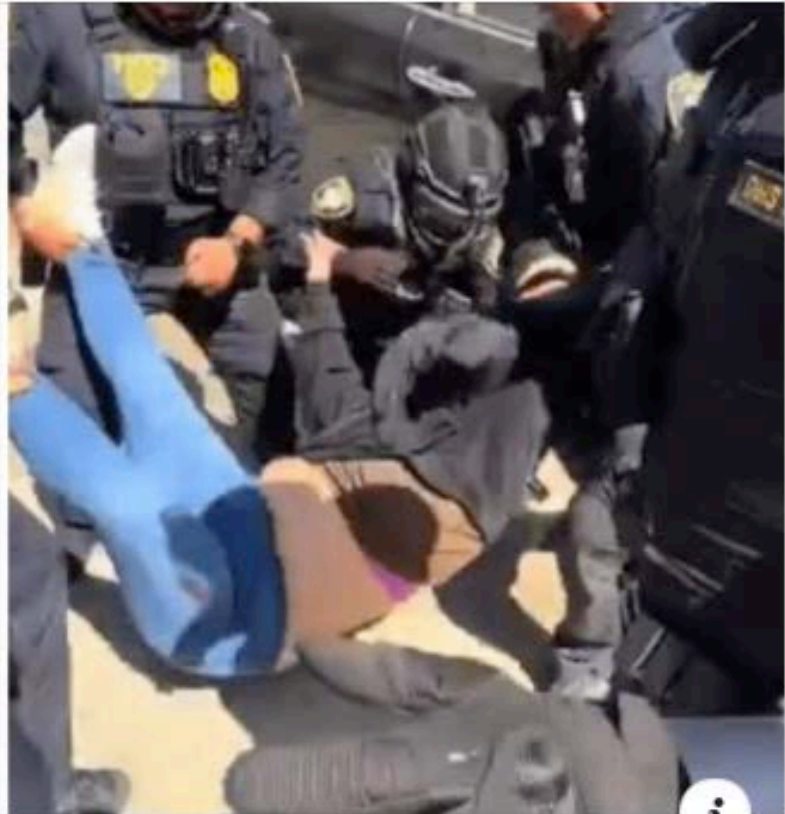
To those saying "she shouldve just complied" If you get pulled over for speeding and officers drag you out the car and do this to you, you'll see its not about laws or complicity its about having people with human decency in law enforcement. TRAIN BETTER.



Close the Camps

October 8, 2025 · 🌐

ICE agents gang up on woman violently attacking her and tearing her clothes off.



NEWSWEEK.COM

ICE Agents Rip Clothes Off Woman During Arrest, Video Shows

EXHIBIT H1



Diana Arevalo

★ Rising contributor

+ Add topic

October 9, 2025 · 🌐



Sharing this video I was sent today. This happened yesterday during school dismissal near the UIC campus. I volunteer to pick up kids from school in the Pilsen/Humboldt park areas. You can send me a private message.

These acts of violence are inhumane and heart breaking 💔 🇺🇸



EXHIBIT H2



Fabian Fukuy

So sad and heartbreaking to see this happening, we used to see scenes like this just in movies or in war zones... more than 10 agents to capture a mother/sister/girlfriend/neighbor, we need to speak out, this won't stop here!

17w Like Share Edited



Daniel Alvarado

They are harrasing our city. They should go after real criminals. They are only getting easy target working hispanics

16w Like Share



Maura Bowen

Horrible!!! I was in tears this morning seeing this.

17w Like Share



EXHIBIT H3



Lupe Castillon

Oh my gosh, what are they doing to that poor student this is horrible. They're supposed to be seeking criminals not students that are trying to make life better and become somebody in the society. 😱 my Heart Family.

17w Like Share 4 

EXHIBIT I



Yocelin Benitez · [Follow](#)



+ Add topic · October 12, 2025 ·

Today in the morning around 11:30 ICE was seen on 65th and Mozart!! Please be safe and don't go out

[View insights](#)

2K post reach >

9

2 shares

Like

Share

EXHIBIT J



ICE Sighting- Chicagoland

Micah Hans Holden · Top contributor · October 12, 2025 · 🌐



SKIP CHURCH! (Or whatever you usually do on Sunday mornings). Veterans, NOW IS THE TIME FOR ACTION! Join us this Sunday, October 12 from 9 am - 12pm at the ICE Detention Center in Broadview, IL (near Chicago) as we PEACEFULLY and NONVIOLENTLY protest against ICE. Come at your own risk and wear your medals and/ or military uniform. Friends and family members are also encouraged to come and protest. I look forward to seeing you there as we fight for the future of democracy.

<https://www.facebook.com/share/1A5WK8havf/?mibextid=wwXlfr>



EXHIBIT K



Anonymous participant



+ Add topic · October 13, 2025 · 🌐

So I have a question. My 80+ year old grandmother was born in South America, but an American citizen for 30 years. She lives in Hoffman Estates/HanoverPark, IL. I am so worried about her going into public. Even if she's harassed and scared, she has heart problems with high blood pressure. I'm worried she'll be scared into a heart attack or other health conditions. Other than staying at home, what can she bring with her? I'm first generation, born in the US. She looks Hispanic with a strong accent. She's actually afraid to go out, other than going to church.

[View insights](#)

2K post reach >

🤔 🗨️ 👍 70

42 comments

👍 Like

➦ Share

Commenting has been turned off for this post.

[View more answers](#)



A.D. Stetson

Copies of any identifying papers, leaving originals at home. Your number (or another nearby loved one) & a lawyer's number written somewhere. If she's not opposed to it, maybe even one of those Life-Alert style buttons that will notify you if there are issues? I'm so sorry your family even has to worry about these things.

16w Like Share

17 👍 🗨️

[View 1 reply](#)

EXHIBIT L1

ICE Sighting- Chicagoland

Public group · 94.4K members



+ Invite Share



We removed your group

Your profile went against the Community Standards multiple times, so it's no longer visible to people on Facebook.

See why

EXHIBIT L2



Details

Oct 13, 2025

We suspended your group



ICE Sighting- Chicagoland

Group has been suspended

Why this happened

We suspended your group because some of the activity on it may not follow our rules.



ICE Sighting- Chicagoland

This goes against our Community Standards on coordinating harm and promoting crime.



See rule



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

KASSANDRA ROSADO and KREISAU GROUP
LLC,

Plaintiffs,

v.

PAMELA BONDI, in her official capacity as
Attorney General, and

KRISTI NOEM, in her official capacity as Secretary
of Homeland Security,

Defendants.

Civil Action No.: 1:26-cv-01532

Hon. Jorge L. Alonso

**DECLARATION OF MARK HODGES IN SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Mark Hodges, declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration.
2. Attached as Exhibits A1 and A2 to this declaration are true and accurate images of communications I received from Apple during the approval process for Eyes Up, flagging the issues that needed to be (and were) resolved before Apple approved Eyes Up for inclusion on the Apple app store.
3. Attached as Exhibit B to this declaration is a true and accurate image of the communication I received from Apple on October 3, 2025, notifying me of the removal of Eyes Up from the Apple app store.

4. Attached as Exhibits C1 and C2 to this declaration are true and accurate images of the first appeal of the removal of Eyes Up I submitted to Apple on October 3, 2025, and Apple's response to that appeal on October 6, 2025.

5. Attached as Exhibit D to this declaration is a true and accurate copy of the text of the second appeal I submitted to Apple on October 8, 2025.

6. Attached as Exhibit E to this declaration is a true and accurate image of communications between me and Apple, consisting of Apple's request for more information following my second appeal on October 21, 2025, my response on October 28, 2025, and Apple's subsequent denial of my second appeal on November 8, 2025.

7. Attached as Exhibit F to this declaration is a true and accurate image of the Eyes Up map interface, which shows the locations of videos users have uploaded after Kreisau Group LLC moderators have reviewed and approve them.

8. Attached as Exhibit G to this declaration is a true and accurate copy of a video submitted to and stored on Eyes Up, titled "Full video of US citizen being thrown to the ground by agents in Charlotte." The video is also available at <https://eyesupapp.com/video/651ef8f1-48a0-4c6f-ad55-34c22167dcd4>.

9. Attached as Exhibit H to this declaration is a true and accurate copy of a video submitted to and stored on Eyes Up, titled "ICE breaks glass and endangers a 1 month old baby." The video is also available at <https://eyesupapp.com/video/5d809966-38b7-4ff4-ac6d-63047f1a0dd3>.

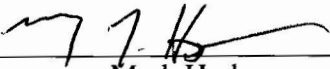
10. Attached as Exhibit I to this declaration is a true and accurate copy of a video submitted to and stored on Eyes Up, titled "Chicago's Broadview ICE Targets Pastor in Prayer:

Opens Fire from Rooftop, Shooting Him and Causing Him to Collapse.” The video is also available at <https://eyesupapp.com/video/3a5af4c3-f989-4e94-a192-5f7a986644da>.

11. Attached as Exhibit J to this declaration is a true and accurate copy of the rules that any user of Eyes Up must read and accept before submitting a video.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 25, 2026.



Mark Hodges

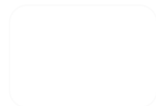




EXHIBIT A1

< App Review

iOS Submission

Removed

Items Submitted (1)

ITEM	TYPE	REVIEW STATUS
	<p>iOS App 1.0 1.0.0 (6)</p>	<p>App Version</p>
		<p>Removed</p> <p>1.2.0 Safety: User Generated Content</p> <p>5.1.1 Legal: Privacy - Data Collection and Storage</p> <p> Screenshot-0821-120156.png Download</p> <p> Screenshot-0821-120202.png Download</p> <p> Screenshot-0821-120244.png Download</p> <p> Screenshot-0821-120253.png Download</p>

Apple 2025-08-21 12:05 AM

Review Environment

Submission ID: 3da28f01-195b-44c8-a544-b09125011854
 Review date: August 21, 2025
 Version reviewed: 1.0

Guideline 5.1.1 - Legal - Privacy - Data Collection and Storage

Issue Description

One or more purpose strings in the app do not sufficiently explain the use of protected resources. Purpose strings must clearly and completely describe the app's use of data and, in most cases, provide an example of how the data will be used.

Next Steps

Update the camera, photo library, and microphone purpose string to explain how the app will use the requested information and provide a specific example of how the data will be used. See the attached screenshot.

Update the camera, photo library, and microphone purpose string to explain how the app will use the requested information. See the attached screenshot.

Resources

Purpose strings must clearly describe how an app uses the ability, data, or resource. The following are hypothetical examples of unclear purpose strings that would not pass review:

- "App would like to access your Contacts"
- "App needs microphone access"

See examples of [helpful, informative purpose strings](#).

Eyes Up App [Distribution](#) [TestFlight](#) [Xcode Cloud](#)

Guideline 1.2 - Safety - User-Generated Content

We found in our review that your app includes user-generated content but does not have all the required precautions. Apps with user-generated content must take specific steps to moderate content and prevent abusive behavior.

Next Steps

To resolve this issue, please revise your app to implement the following precautions:

- Require that users agree to terms (EULA) and these terms must make it clear that there is no tolerance for objectionable content or abusive users
- A method for filtering objectionable content
- A mechanism for users to flag objectionable content
- A mechanism for users to block abusive users
- The developer must act on objectionable content reports within 24 hours by removing the content and ejecting the user who provided the offending content

Resources

Learn more about our policies for user-generated content in [App Review Guideline 1.2](#).

Support

- Reply to this message in your preferred language if you need assistance. If you need additional support, use the [Contact Us module](#).
- Consult with fellow developers and Apple engineers on the [Apple Developer Forums](#).
- Provide feedback on this message and your review experience by [completing a short survey](#).

Date Submitted

Aug 11, 2025 at 11:17 PM

Submission ID

3da28f01-195b-44c8-a544-b09125011854

Submitted By

Mark Hodges

Last Updated By

Mark Hodges

App Store Connect

EXHIBIT A2

Trends

Reports

Business

Mark Hodges 
Users and Accounts
Kreisau Group LLC

Eyes Up App

Distribution

TestFlight



Xcode Cloud

[< App Review](#)


iOS Submission

 Review Completed

Items Submitted (1)

ITEM	TYPE	REVIEW STATUS
 iOS App 1.0 1.0.0 (6)	App Version	 Approved

Messages (1)

 **Apple** 2025-08-26 5:06 AM

Hello,

Thank you for your efforts to follow our guidelines. There are still some issues that need your attention.

If you have any questions, we are here to help. Reply to this message in App Store Connect and let us know.

Review Environment

Submission ID: 93a7dff4-1a4d-4b3c-8999-7cca05663854
Review date: August 26, 2025
Version reviewed: 1.0

Guideline 2.1 - Performance - App Completeness

Issue Description

The app exhibited one or more bugs that would negatively impact users.

Bug description:

-When we clicked on "Download," an error message appeared, indicating that we couldn't download the video.

Review device details:

- Device type: iPad Air (5th generation)

- OS version: iPadOS 18.6.2

Next Steps

Test the app on supported devices to identify and resolve bugs and stability issues before submitting for review.

If the bug cannot be reproduced, try the following:

- For new apps, uninstall all previous versions of the app from a device, then install and follow the steps to reproduce.
- For app updates, install the new version as an update to the previous version, then follow the steps to reproduce.

Resources

- For information about testing apps and preparing them for review, see [Testing a Release Build](#).
- To learn about troubleshooting networking issues, see [Networking Overview](#).

Guideline 1.2 - Safety - User-Generated Content

We found in our review that your app includes user-generated content but does not have all the required precautions. Apps with user-generated content must take specific steps to moderate content and prevent abusive behavior.

Next Steps

To resolve this issue, please revise your app to implement the following precautions:

- Require that users agree to terms (EULA) and these terms must make it clear that there is no tolerance for objectionable content or abusive users
- A method for filtering objectionable content
- A mechanism for users to flag objectionable content
- A mechanism for users to block abusive users
- The developer must act on objectionable content reports within 24 hours by removing the content and ejecting the user who provided the offending content

Resources

Learn more about our policies for user-generated content in [App Review Guideline 1.2](#).

Guideline 5.1.1 - Legal - Privacy - Data Collection and Storage

Issue Description

One or more purpose strings in the app do not sufficiently explain the use of protected resources. Purpose strings must clearly and completely describe the app's use of data and, in most cases, provide an example of how the data will be used.

Next Steps

Update the camera purpose string to explain how the app will use the requested information and provide a specific

example of how the data will be used. See the attached screenshot.

Update the camera purpose string to explain how the app will use the requested information. See the attached screenshot.

Resources

Purpose strings must clearly describe how an app uses the ability, data, or resource. The following are hypothetical examples of unclear purpose strings that would not pass review:

- "App would like to access your Contacts"
- "App needs microphone access"

See examples of [helpful, informative purpose strings](#).

Support

- Reply to this message in your preferred language if you need assistance. If you need additional support, use the [Contact Us module](#).
- Consult with fellow developers and Apple engineers on the [Apple Developer Forums](#).
- Request an [App Review Appointment at Meet with Apple](#) to discuss your app's review. Appointments subject to availability during your local business hours on Tuesdays and Thursdays.
- Provide feedback on this message and your review experience by [completing a short survey](#).

Date Submitted

Aug 26, 2025 at 6:32 PM

Submission ID

93a7dff4-1a4d-4b3c-8999-7cca05663854

Submitted By

Mark Hodges

Last Updated By

Apple

App Store Connect

EXHIBIT B

Hello,

We are writing to let you know about new information regarding the latest approved version of your app, Eyes Up App, by Kreisau Group LLC, which could impact its availability on the App Store.

Upon re-evaluation, we found that your app is not in compliance with the App Review Guidelines. Specifically, we found your app is in violation of the following:

1.1 Objectionable Content

Apps should not include content that is offensive, insensitive, upsetting, intended to disgust, in exceptionally poor taste, or just plain creepy. Examples of such content include:

1.1.1 Defamatory, discriminatory, or mean-spirited content, including references or commentary about religion, race, sexual orientation, gender, national/ethnic origin, or other targeted groups, particularly if the app is likely to humiliate, intimidate, or harm a targeted individual or group. Professional political satirists and humorists are generally exempt from this requirement.

Information provided to Apple by law enforcement shows that your app, Eyes Up App, by Kreisau Group LLC, violates Guideline 1.1.1 because its purpose is to provide location information about law enforcement officers that can be used to harm such officers individually or as a group.

For this reason, your app <> will be removed from the App Store. Customers who have previously downloaded this app will continue to have access to it on their devices, but they will be unable to re-download this app from the App Store or restore this app from a backup if they delete it from their device. Additionally, customers will be unable to purchase in-app purchase products and any auto-renewable subscriptions will be canceled. The TestFlight version of this app will also be unavailable for external and internal testing and all public TestFlight links will no longer be functional.

Best regards,

App Review

EXHIBIT C1

2.1 - App Completeness

5 - Legal

1.2 - User-Generated Content

Other issue

Select the topic that fits your appeal request:

App Removal



Reason for appeal

Hello App Store Review,

Thank you for your thoughtful message. I am happy to inform you that our app does not violate Guideline 1.1.1 because the posts on this app are significantly delayed and subject to manual review, meaning the officers will be long gone from the location by the time the content is posted to be viewed by the public.

This would make it impossible for our app to be used to harm such officers individually or as a group.

The sole purpose of Eyes Up is to document and preserve evidence of abuses of power by law enforcement, which is an important function of a free society and constitutionally protected. I appreciate the prompt reinstatement.

Thank you,

Mark

Provide specific reasons why you believe your app complies with the App Review Guidelines.

2000 characters or less.

EXHIBIT C2

Hello Mark,

Appeal Ticket: APL253092

The App Review Board has determined that the decision to reject your app, Eyes Up App, was based entirely on App Review Guideline violations present in the app and that the rejection feedback remains valid.

As we previously communicated, information provided to Apple by law enforcement shows that your app violates Guideline 1.1.1 because its purpose is to provide location information about law enforcement officers that can be used to harm such officers individually or as a group.

For the sake of clarity, we have included relevant excerpts from the App Review Guidelines below for reference:

1.1 Objectionable Content

Apps should not include content that is offensive, insensitive, upsetting, intended to disgust, in exceptionally poor taste, or just plain creepy. Examples of such content include:

1.1.1 Defamatory, discriminatory, or mean-spirited content, including references or commentary about religion, race, sexual orientation, gender, national/ethnic origin, or other targeted groups, particularly if the app is likely to humiliate, intimidate, or harm a targeted individual or group. Professional political satirists and humorists are generally exempt from this requirement.

Best regards,

App Review Board

EXHIBIT D

Appeal #2: (10/8)

Hello App Review Team,

Thank you for reviewing our previous appeal. I'm writing to provide clear technical details about how Eyes Up App works and to address the concern that its purpose is "to provide location information about law enforcement officers that can be used to harm such officers."

1. Purpose and Design Eyes Up is a public transparency and safety platform intended for ordinary people to document immigration enforcement actions and other law enforcement activity that may impact communities. Its design goal is to promote accountability and protect civil rights, not to track or harm officers.

2. What Users Can and Cannot Post

Users can upload videos and images of events after they occur — there is no real-time officer tracking.

No database of officer names, identities, or live locations is included.

Uploads are moderated before appearing publicly; submissions violating safety or doxxing rules are removed.

3. Safeguards to Prevent Harm

Delayed publishing: Posts are not live streams of officer movement; there is inherent time lag from record to appearance.

Location obfuscation: Users may share only approximate event locations (e.g., city block, neighborhood) and cannot pin officer movements in real time.

Reporting & moderation tools: Any content that could endanger individuals (including law enforcement) can be reported and is subject to review/removal.

Educational content: The app shows safety guidance and discourages confrontation or attempts to interfere with officers.

4. Difference from Harmful Use Because there's no way to use Eyes Up to follow or ambush officers in real time — and because individual identities are not exposed — the app does not present the risk described in Guideline 1.1.1.

Request

We respectfully ask that you reconsider the classification under Guideline 1.1.1. If there are specific changes you believe would strengthen safety (e.g., additional disclaimers, location granularity limits), we're committed to implementing them.

EXHIBIT E

Trends

Reports

Business

Mark Hodges 
Users and Ac
Kreisau Group LLC[< App Review](#)

Communication Message

 Unresolved issues

Messages (5)

[> Apple](#) 2025-10-03 5:27 PM[> Apple](#) 2025-10-06 5:31 PM[v Apple](#) 2025-10-21 7:41 PM 

Hello,

Appeal Ticket: APL253092

We received your appeal submission for your Eyes Up App. However, we need additional information from you before we can proceed:

Question 1

In your appeal, you stated that "Location obfuscation: Users may share only approximate event locations (e.g., city block, neighborhood) and cannot pin officer movements in real time."

However, your app allows users to manually enter detailed location information and select precise map points to mark an activity. Additionally, content shared or viewed in your app reveals exact location details, including pinpoint map locations or detailed location descriptions provided in video posts.

Please clarify how this aligns with your claim that users may only share approximate activity locations.

Question 2

You also noted that uploads are moderated before appearing publicly. This aligns with the statement in your app description: "Metadata Control – Strips identifying data before publishing." However, numerous publicly visible posts include specific geographic identifiers, especially when paired with video posts.

If there is active moderation and identifying data is removed before publishing, can you confirm that all publicly available content and videos within your app are fully consistent with your stated policies and Terms of Use?

Please clarify if the example screenshots shared are consistent with your moderation standards and the intended use of the app.

Question 3

In your appeal, you mentioned that "Delayed publishing: Posts are not live streams of officer movement; there is inherent time lag from record to appearance." At the same time, your app screenshots reference live streaming functionality. Can you clarify if live streaming is currently available to users? If so, how does the feature work? Does it share content publicly in real time, or is it only released after moderation?

Question 4

While your app allows users to post content anonymously, what mechanism is in place to detect and prevent abusive users from the service, especially in relation to the App Review Guideline 1.2, the third bullet point of its requirement:


The ability to block abusive users from the service


Please reply to this message with the requested information so we can continue our investigation. Once the App Review Board has completed its evaluation, we will contact you directly via App Store Connect.


Best regards,

App Review Board


Message Attachments:


 Question+1(4).png [Download](#)


 Question+2(2).png [Download](#)


 Question+1(2).png [Download](#)


 Question+3.png [Download](#)

 Question+1(1).png [Download](#)

 Question+2(3).png [Download](#)

 Question+2(4).png [Download](#)

 Question+1(3).png [Download](#)

 Question+2(1).png [Download](#)

✓ **Mark Hodges** 2025-10-28 11:35 AM

Re: Appeal Ticket APL253092 — Requested Clarifications for Eyes Up App

Hello App Review Board,

Thank you for the opportunity to clarify. Below are responses to each question.

Question 1 — Exact vs. Approximate Locations

Users are permitted to manually select a point on the map, but the app never publishes the exact geolocation stored in a video file. Before any content becomes public, two protections are enforced:

1. GPS metadata stripping

— All EXIF / embedded geolocation data is permanently removed on upload.

2. Manual map selection only

— The only location displayed is whichever map point a user chooses, which may be a neighborhood, block, nearby landmark, or building.

— Users cannot follow live officer movement because the map pin does not update dynamically and no GPS tracking

occurs, plus there is a delay before these videos appear on the map.

Additionally, the UI reinforces approximation:

- The tooltip instructs users to “Search for a location or tap the map...” rather than use GPS coordinates.
- The interface never displays precise GPS coordinates.

We are happy to further constrain this behavior if preferred, such as limiting zoom levels, limiting granularity, or shifting pins to a random offset.

Question 2 — Moderation and Identifier Removal

We confirm that:

1. All content undergoes human moderation prior to being visible publicly
2. Moderators ensure no content that violates our terms & conditions is allowed on the platform
3. Video metadata (including time, GPS, device info) is stripped before publishing

To clarify the specific screenshots you referenced:

- Some users include voluntary contextual descriptions (e.g., a street name)
- This text is user-authored, not metadata-derived
- These posts were approved only after confirming no personally targetable details remained

We welcome App Review guidance if further tightening of the content rules is desired (e.g., removing street-level naming).

Question 3 — Live Streaming Feature

This capability currently works only as a backup recording tool:

1. A user may choose the “Quick” mode to stream encrypted footage privately
2. It does not publish or broadcast in real time
3. A moderator must review and approve the content before it appears in the app’s public feed
4. We are prepared to rename UI elements to reduce confusion (e.g., “Failsafe Backup Recording”)

There is no real-time public streaming, and no ability for other users to track officer locations live at any time.

Question 4 — Abuse Prevention & User Removal

Although uploads are anonymous to other users, we maintain internal controls permitting moderation and removal:

1. A consent ID (local identifier) is securely associated with each device
2. Repeat abusive behavior results in permanent device-level revocation
3. All uploads are manually reviewed, and abusive content never becomes visible
4. In-app reporting enables immediate moderator review and takedown

If needed, we can implement:

- Captcha at upload
- Rate limiting
- Additional automated abuse detection

We fully comply with Guideline 1.2 and can further strengthen anti-harassment enforcement per Apple’s recommendations.

In Summary

We are committed to ensuring Eyes Up remains:

- Non-targeting
- Delay-based (not real-time tracking)
- Privacy-protective
- Moderated for safety before publication

If there are specific modifications you would like to see (e.g., further zoom restrictions, UI language changes), we will implement them immediately.

We appreciate your continued review and are standing by to assist with any additional questions.

Best regards,
Mark Hodges
Developer — Eyes Up App
Kreisau Group LLC

✓ **Apple** 2025-11-08 6:12 PM

Hello Mark,

Thank you for your response. The App Review Board determined that the original rejection and removal feedback was valid.

We understand that in your appeal and recent response, you mentioned potential improvements to your app. However, we don't pre-approve or pre-reject apps based on proposed changes or suggestions provided by developers. Each app submission is reviewed against the App Review Guidelines, and the review results are provided after the app has been submitted for review.

Best regards,

App Review Board

[↩ Reply to App Review](#)

Guideline (1)

5.0.0 Legal: Preamble

Version Applicable (1)

iOS 1.0

App Store Connect

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Eyes Up App  [Distribution](#) [TestFlight](#) [Xcode Cloud](#)

EXHIBIT F



EXHIBIT G

**Full video of US citizen being thrown to the ground by agents in Charlotte
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT H

**ICE breaks glass and endangers a 1 month old baby
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT I

**Chicago's Broadview ICE Targets Pastor in Prayer:
Opens Fire from Rooftop, Shooting Him and Causing Him to Collapse
[.mp4 to be uploaded to Digital Media Exhibit Submission Portal]**

EXHIBIT J

Community Guidelines & EULA

Please agree before you upload.

Eyes Up is a community for documenting public events. **No harassment, hate, threats, illegal content, sexual content, or doxxing.** We remove violations and may restrict accounts. By agreeing, you confirm you'll follow these rules and our Terms/EULA.

[View Terms/EULA](#)

[Privacy Policy](#)

I have read the Terms/EULA and agree not to post objectionable or abusive content.

[Agree & Continue](#)

[Decline](#)

Terms version 1.0.1 • Stored locally