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IN RE: GRAND JURY ) GRAND JURY NO.  
INVESTIGATION ) 25 GJ 994

BEFORE THE FEDERAL GRAND JURY  
(Special June 2024 Grand Jury)

October 9, 2025

2:28 o'clock p.m.

PRESENT: THE HONORABLE ANDREW S. BOUTROS  
Interim United States Attorney, by  
MS. SHERI MECKLENBURG  
MR. MATTHEW SKIBA  
Assistant United States Attorney  
Chicago, Illinois 60604

(The Grand Jury having convened  
at 2:28 o'clock p.m. on the 9th  
day of October 2025, pursuant to  
adjournment, met in closed session  
and the following proceedings were  
had herein.)

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1 EVAN HYLTON

2 having entered the Grand Jury room, was sworn by  
3 the Foreperson as follows:

4 MS. MECKLENBURG: I'm happy to be  
5 back. Sheri Mecklenburg. We're here -- I'll  
6 introduce my co-counsel in a minute. We're here  
7 on 25 GJ 994.

8 With me today is Matthew Skiba.  
9 Matt is my partner on this case, and he hasn't  
10 been in the office very long. He has been a great  
11 partner. I'm very lucky to have him. So this is  
12 an interesting case.

13 THE COURT REPORTER: Can you go to  
14 the mic?

15 MS. MECKLENBURG: Yes. This is a  
16 very interesting case. It's a little different.  
17 I purposely asked if I could wait for the Thursday  
18 grand jury. I did.

19 Matt will vouch for me. I said I  
20 want to go in front of the Thursday grand jury  
21 because I know you and I trust you and you know me  
22 and you trust me, and I would never ask you to  
23 charge somebody if I didn't think there was  
24 probable cause and you know you've asked me before  
25 "Well, what about this person?" And I said "I

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1 don't charge people unless I'm absolutely sure."

2 So this case I want you to do what  
3 we have done and that is put aside any personal  
4 feelings. It arises out of the protests at the  
5 ICE facility. I want you to put aside your  
6 personal feelings. Your politics have nothing to  
7 do with that.

8 I ask that you follow the facts and  
9 the law and if there is probable cause to charge,  
10 then that's what I ask you to do. And it's not  
11 about any particular policy or anything else.  
12 It's just whether people can do certain things  
13 that break the law or not. So let me make sure I  
14 covered all of those warnings with you.

15 I don't think I need to go into all  
16 of them because you guys have been doing this a  
17 long time, but I want to just remind you that this  
18 is not -- this is a probable cause standard. It's  
19 not the guilt-finding phase that the -- you're not  
20 asked to consider the wisdom of Congress for  
21 making something a crime.

22 The punishment does not matter to  
23 you because, that, we try to work out as we go  
24 along very often as you know. You're just being  
25 asked to decide the facts from the evidence

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1 presented and the only other thing I want to  
2 remind you that you have -- you have sworn to  
3 uphold your duties fairly and impartially. You  
4 should not let sympathy, prejudice, fear or public  
5 opinion influence you.

6 Finally, if you have questions  
7 during your deliberations, I ask that you come out  
8 and let me know so that we can address your  
9 questions rather than you just decide on your own  
10 that there's a problem.

11 So I'm going to give you a few  
12 seconds of what this case is and then we're going  
13 to call in a witness and we're going to show you  
14 some videos and photos.

15 This case arises at the Broadview  
16 ICE facility. Have you had anything arising out  
17 of the Broadview ICE facility?

18 GRAND JURY: No.

19 MS. MECKLENBURG: We're the first.  
20 It is being used as a detention facility by ICE  
21 right now and what you're going to see -- and,  
22 remember, my summary is not evidence. It's not  
23 testimony. It's not evidence. I'm just giving  
24 you a summary. The testimony and the documents  
25 and the exhibits will be the evidence.

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1                   An agent pulled into -- pulled his  
2 car into the street that leads up to Broadview  
3 where he was going. He was not from Illinois. He  
4 was from another state. He was told that's where  
5 he is to report.

6                   He is a supervisor of the facilities  
7 and he is there. He is the person who makes sure  
8 that all the supplies are there and there's  
9 staffing and everything.

10                  As he pulls in past the gate and as  
11 he gets there, there are a crowd of protesters and  
12 they see him and they surround his car and you'll  
13 see the video. There is video of it. They all  
14 posted the video.

15                  They surround his car and they are  
16 banging on the hood and they are banging on the  
17 windows and they are pushing up against -- they're  
18 standing in front of the car. They're pushing up  
19 against the front of the car so that he -- trying  
20 to prevent him from moving, I guess, and they're  
21 chanting, they're scratching into the car.

22                  His driver -- you'll see evidence  
23 that his driver's side mirror was broken off.  
24 You'll see evidence that his back windshield was  
25 broken off. You'll see evidence that his car was

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1 scratched and dented, and you will see evidence  
2 that somebody scratched the word "Pig" into the  
3 car.

4                   And I will just tell you this. This  
5 is definitely not testimony, but you will see it  
6 for yourself. It's common sense. Just by that  
7 agent keeping his cool and inching, inching  
8 forward, nobody got hurt.

9                   The first time I watched it I  
10 thought, oh, my God. What happens here? Nobody  
11 got hurt. If he had lost his cool in any way and  
12 done something, it would have been a tragedy. So  
13 fortunately we are not here for that.

14                   But I'm going to present to you an  
15 agent who is going to walk us through the videos  
16 and then we're going to show you how we identified  
17 -- we have an interview of Agent A we're going to  
18 tell you about who is the driver and then we're  
19 going to talk about how we identified people in  
20 the video and it's kind of an interesting thing  
21 because what you do is you find a social media  
22 account -- you'll hear this evidence.

23                   And then you see that they posted a  
24 video of the incident and then you see that  
25 somebody -- they liked someone else's post of the

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1 video so you go to their post of the video and you  
2 see that they tagged someone else and you go to  
3 theirs and if you pull all of their faces, you  
4 recognize them in the video.

5 And, of course, some people were  
6 posting "I was there, and I was one of the  
7 people." So that was helpful. And then in the  
8 end, I will tell you about the law, and we'll ask  
9 you for an indictment. We're asking you for an  
10 indictment on a conspiracy that they all together  
11 did this and on a 110 -- it's -- the second count  
12 is a misdemeanor assault on an officer.

13 First is the felony. The second we  
14 have a misdemeanor. So I'm going to make sure my  
15 computer is up, you know I don't usually bring my  
16 computer, and get it going. You want to get -- do  
17 you want to get him?

18 MADAM FOREPERSON: Are we having the  
19 indictments today?

20 MS. MECKLENBURG: Yes, I have an  
21 indictment today. I have an indictment with a  
22 conspiracy count and then a one -- each person --  
23 there's six defendants. Each person will have a  
24 separate 110 misdemeanor count.

25 Okay. Let's see what I got. You

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1 know this makes me very concerned. This is what I  
2 was worried about. Nothing is coming -- my  
3 documents won't come up. I might have to do it  
4 from the agent or -- I can't get anything.  
5 Unbelievable. Let's see if this will work. I  
6 have it on a disk, which doesn't play as well, but  
7 we'll all have to get through it, and I will get  
8 right to you, agent. Okay.

9 THE COURT REPORTER: I will just  
10 activate your computer. Set it up real quick.  
11 There is a USB behind the monitor.

12 MS. MECKLENBURG: I think this is  
13 going to work. We'll find out. Okay.

14 MADAM FOREPERSON: Can you please  
15 raise your right hand?

16 State and spell your name for the  
17 record.

18 THE WITNESS: Evan Hylton, E-v-a-n  
19 H-y-l-t-o-n.

20 MADAM FOREPERSON: Do you solemnly  
21 swear or affirm that the testimony you're about to  
22 give before this grand jury to tell the truth, the  
23 whole truth and nothing but the truth, so help you  
24 God?

25 THE WITNESS: I do.

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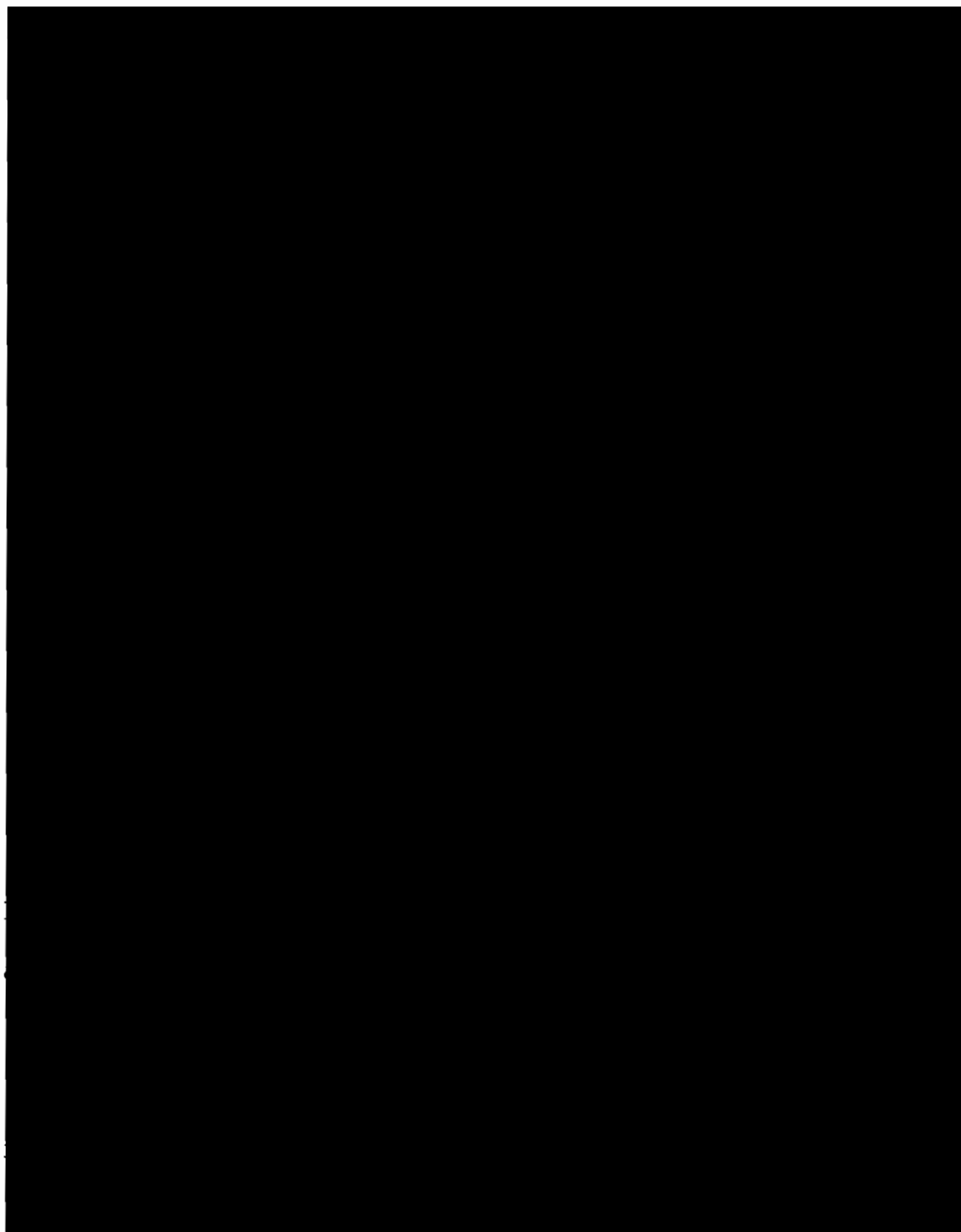
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MADAM FOREPERSON: Thanks.

(Whereupon, the witness  
was sworn.)

D I R E C T                    E X A M I N A T I O N



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20                   At this time, I would like to  
21 present the law to you. Does anybody have any  
22 questions for our agent before he -- before I  
23 allow -- ask him to step out while we talk about  
24 the law? Yes.

25                   GRAND JURY: When that agent was in

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1 the vehicle by himself in the middle of the mob,  
2 was he asked -- did he indicate why he didn't call  
3 for backup or for any help?

4 THE WITNESS: Yes. In the  
5 interview, he indicated that he was more concerned  
6 that there were so many people in front of his  
7 car, that he didn't really have the wherewithal or  
8 the ability to call for help because he was afraid  
9 that someone was going to get stuck under the car.  
10 So he was more concerned with making sure he was  
11 going slow and not running anybody over.

12 GRAND JURY: Thank you.

13 MS. MECKLENBURG: Yes?

14 MADAM FOREPERSON: Obviously there's  
15 more than six people here at the scene.

16 Are those six people in this because  
17 you're able to identify them and the others --

18 MS. MECKLENBURG: I will answer that  
19 for you. I will tell you the investigation  
20 continues.

21 MADAM FOREPERSON: Okay.

22 MS. MECKLENBURG: I might be back.

23 MADAM FOREPERSON: Okay.

24 MS. MECKLENBURG: I might not. But  
25 for right now, these are six people who we are

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1 comfortable have been identified. Identifications  
2 continue. I'm not bringing you anyone who we  
3 think we might have identified, but not sure.

4 MADAM FOREPERSON: Okay.

5 GRAND JURY: How about the stop --

6 THE COURT REPORTER: I can't hear  
7 this.

8 GRAND JURY: Following up on the  
9 other question.

10 MS. MECKLENBURG: Following up on  
11 the other question, he said.

12 GRAND JURY: Couldn't he have  
13 stopped?

14 MS. MECKLENBURG: Couldn't he have  
15 stopped?

16 GRAND JURY: If he is afraid of  
17 running over people, isn't the right thing to do  
18 to stop?

19 MS. MECKLENBURG: Well, didn't you  
20 hear the testimony that he said he was afraid to  
21 stop because he was afraid they were going to  
22 break the windows and pull him out and he would be  
23 injured?

24 So he said -- the testimony was that  
25 he said he was concerned about stopping for his

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1 own safety and he was concerned about the safety  
2 in the front. So he had to balance it. And this  
3 is not testimony now, but I would argue he did a  
4 pretty good job of balancing it because nobody got  
5 hurt.

6 GRAND JURY: I know.

7 MS. MECKLENBURG: So you want to  
8 talk about the right thing. What if he had  
9 stopped?

10 GRAND JURY: But it's the flip of  
11 the thing is can't you say he was trying to run  
12 over the people?

13 MS. MECKLENBURG: Did you really  
14 think when you saw that video --

15 GRAND JURY: No. It's a bad  
16 question --

17 MS. MECKLENBURG: I understand  
18 what --

19 THE COURT REPORTER: What? Wait.

20 MS. MECKLENBURG: Do you have  
21 questions for the agent because I'll stay and go  
22 through the law. I'm going to argue anything you  
23 want.

24 GRAND JURY: Okay.

25 GRAND JURY: Could you -- one of the

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1 videos it looked like there was another vehicle  
2 behind the agent's --

3 Could you show the video?

4 MS. MECKLENBURG: Another vehicle  
5 behind what?

6 GRAND JURY: It looked like there  
7 was another vehicle behind the truck.

8 THE WITNESS: I can answer that.

9 MS. MECKLENBURG: Okay.

10 THE WITNESS: That is a public  
11 street and there's private businesses there to  
12 include, I believe, a trucking company. I think  
13 that was an 18-wheeler with a tractor and trailer  
14 behind that vehicle.

15 GRAND JURY: Could you show one  
16 second? I just want to see that for my own --

17 MS. MECKLENBURG: Is that at the end  
18 of the passenger side?

19 GRAND JURY: That would be yes.

20 THE WITNESS: Yes, it's at the end.

21 MS. MECKLENBURG: There's going to  
22 be another one.

23 GRAND JURY: Can we see it again?

24 MS. MECKLENBURG: Of course. Do you  
25 want another one?

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1 GRAND JURY: Maybe it was the other  
2 video.

3 THE WITNESS: It's this video. It's  
4 just further along.

5 GRAND JURY: Okay. Did you -- did  
6 anybody try to identify the truck and talk to the  
7 truck driver of the vehicle who was behind him?

8 MS. MECKLENBURG: I will just tell  
9 you this. That's not evidence that we're  
10 presenting today.

11 GRAND JURY: Okay.

12 MS. MECKLENBURG: The evidence that  
13 we're presenting today we believe establishes  
14 probable cause. There may be -- as the  
15 investigation continues, we may interview  
16 additional witnesses, but once we have the video  
17 and we have identified the people in the video,  
18 that is -- that is what we believe is our probable  
19 cause.

20 So we're not -- we're asking you to  
21 indict on probable cause based on the evidence  
22 that we have. It doesn't mean that we won't go  
23 talk to people, but this is very fast happening  
24 and this happened, like, less than two weeks ago.  
25 I have one there.

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1 GRAND JURY: The scratches on the  
2 vehicle, do you have anything showing the vehicle  
3 prior to this incident to prove that those  
4 scratches happened during this incident? And it  
5 also sat there for five days after the incident.  
6 So what -- I guess I'm asking what proof do you  
7 have those scratches happened during that  
8 incident?

9 THE WITNESS: So as far as the  
10 facility, that's a secure, gated facility under  
11 24/7 surveillance. So I can speak to it sitting  
12 there until I took photos of it. The testimony of  
13 the agent is what I'm going on based on he should  
14 know the condition of the vehicle.

15 I'm not going to speak for him, but  
16 I know for government vehicles you are supposed to  
17 essentially let your automotive unit know if there  
18 is any damage to your vehicle and that is  
19 something that is very closely tracked. So right  
20 now it's the testimony of the agent.

21 GRAND JURY: Were those records  
22 checked, the condition of the auto before?

23 THE WITNESS: So she mentioned, it's  
24 still ongoing. So these are all things that will,  
25 again, be pulled.

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1 MS. MECKLENBURG: Let me just point  
2 out to you. This is argument. This is not his  
3 testimony. This is my argument.

4 I don't think in your common sense  
5 and experience you would believe that the agent  
6 was driving around with the word pig etched into  
7 his car and his mirror broken and his rear  
8 windshield broken before this incident.

9 That would be hard -- that would be  
10 a stretch of your common sense to believe that and  
11 you can use your common sense, which is why I came  
12 to the Thursday grand jury. Go ahead.

13 MADAM FOREPERSON: Was the vehicle  
14 fingerprinted?

15 THE WITNESS: Yes, it was.

16 MS. MECKLENBURG: And those  
17 fingerprints are also pending. We will be able to  
18 get those, but based on this, any other questions  
19 for the agent before I let him go?

20 MADAM FOREPERSON: I'm sorry.

21 MS. MECKLENBURG: No.

22 MADAM FOREPERSON: I don't know if  
23 this is a legal question or a question for the  
24 agent. I'm pretty sure it's legal.

25 Is it against the law to touch --

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1 MS. MECKLENBURG: Stop right there.

2 MADAM FOREPERSON: Okay.

3 MS. MECKLENBURG: When you say "is  
4 it against the law," that goes to me, not the  
5 agent.

6 MADAM FOREPERSON: Sorry.

7 MS. MECKLENBURG: Okay. If you  
8 don't have any more questions, I'm going to then  
9 excuse the agent and then I'm going to go into the  
10 law and the indictment.

11 Thank you, agent. If you can wait  
12 outside just in case.

13 (Whereupon, the agent left the  
14 room.)

15 MS. MECKLENBURG: I want to go to  
16 the Elmo now. So this screen so we can do -- I'm  
17 going back to the old-fashioned way.

18 So let me start with the first  
19 statute that I'm asking you for charges under.  
20 It's conspiracy to impede or injure an officer.

21 If two or more persons in any state,  
22 territory, possession conspire to prevent by  
23 force, intimidation or threat any person -- whoa,  
24 what is going on with this? What do I have to hit  
25 to make it not --

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1                   MADAM FOREPERSON: Oh, yeah. It's  
2 an auto focus thing. It goes in and out.

3                   MS. MECKLENBURG: Yeah, I forgot  
4 about that. Doesn't it drive you nuts?

5                   Any person from accepting or holding  
6 any office, trust or place of confidence under the  
7 United States or from discharging any duties  
8 thereof or in -- the next clause doesn't apply --  
9 where his duties as an officer are required to be  
10 performed or to injure him -- or to injure him in  
11 his person or property on account of his lawful  
12 discharge of his duties of his office or while  
13 engaged in the lawful discharge thereof or to  
14 injure his property so as to molest, interrupt,  
15 hinder or impede him in the discharge of his  
16 official duties, each such person shall be fined  
17 under this title or imprisoned or both.

18                   Now, you'll see in the indictment  
19 the words "hinder" and "impede." Those are the  
20 words that I used for the charges. And you heard  
21 testimony that he was on his way. He was at the  
22 facility to report for his official duties.  
23 Question.

24                   GRAND JURY: I understand the  
25 hindering and impeding --

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1 MS. MECKLENBURG: Yes.

2 GRAND JURY: -- but the conspiring?

3 MS. MECKLENBURG: Conspiring -- you  
4 can move from circumstances -- I should have  
5 addressed this right out.

6 A conspiracy is just an agreement.  
7 It doesn't have to be where we sit down and  
8 discuss let's do this together. It's that these  
9 people all did this together which shows they all  
10 agreed to get in front and on the sides and hinder  
11 and impede this officer.

12 Did you see the part in the video  
13 where they all saw he was making some progress and  
14 they all started yelling "Get up front. Get up  
15 front," and then they all start running to the  
16 front. That's in the video that I showed you.

17 So they all run to the front of the  
18 car together to hinder and impede the car. That  
19 is a conspiracy under the law, and I should tell  
20 you under the law for a conspiracy, this is --  
21 remember when your parents told you when you were  
22 young "Be careful who you hang with"? A  
23 conspiracy means that you are -- anyone in the  
24 conspiracy is responsible for anything anyone else  
25 does.

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1                   So, for instance, if Matt and I go  
2 into a bank to rob it and I think nobody is going  
3 to get hurt and he shoots someone, I also am  
4 accountable. We had an agreement to go do this.  
5 Whatever happens is also my fault. Whatever  
6 happened out there, you don't -- we don't have to  
7 find the person who scratched "Pig" into the car.

8                   We just have to show that they were  
9 all doing this and they were all making this  
10 happen and what we showed you for each of the  
11 people named in the indictment every single one of  
12 those people who we showed you had their hands on  
13 the car, bracing against the car, doing -- pushing  
14 their bodies against the car trying to impede or  
15 hinder the car, trying to break the mirror, trying  
16 to -- and banging on the car. We showed you that  
17 they were all doing something in that group.

18                   GRAND JURY: Does the term  
19 "conspiracy" in any way imply that there is prior  
20 thought to this action?

21                   MS. MECKLENBURG: No, not  
22 necessarily. You and I could decide together  
23 right now to go -- do something right on the spot  
24 and that's a conspiracy. It's not -- it's not an  
25 element of conspiracy to prove prior planning,

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1 prior thought. And you can see it in the  
2 conspiracy statute that that's not an element of  
3 it.

4 Question down there.

5 GRAND JURY: Yes. Can your actions  
6 be a conspiracy as well because you know what the  
7 other person is doing?

8 MS. MECKLENBURG: Thank you. You  
9 can agree by action. Yes?

10 GRAND JURY: Okay.

11 MS. MECKLENBURG: So you had a  
12 question.

13 MADAM FOREPERSON: I'm just -- like  
14 how far does this go? If I'm there and I find it  
15 interesting and I take my cell phone out, and I'm  
16 just recording it, am I part of it now?

17 MS. MECKLENBURG: That's a great  
18 question, and I will tell you that for at least  
19 now, we have identified people who were there and  
20 walking alongside and recording or watching or  
21 doing other things there and we did not charge  
22 them. We only -- we identified them. We know who  
23 they are.

24 But we only charged people who are  
25 actually with their hands on the car attempting to

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1 hinder and impede the car. I could -- I don't  
2 want to go back through the video again. You'd  
3 kill me if I did. You'll see people walking along  
4 and their -- some are filming it. Some are just  
5 walking along with it. None of these people are  
6 charged.

7 MADAM FOREPERSON: Is it against the  
8 law to touch a law enforcement vehicle whether  
9 it's --

10 MS. MECKLENBURG: If you're  
11 walking -- okay. If you're walking in a parking  
12 lot and there's a law enforcement vehicle and you  
13 go (indicating), that's not against the law, but  
14 if you're touching it in a way that is to hinder  
15 and impede it, like standing in front of the car  
16 and holding the car and bracing yourself and  
17 pushing against the car and you are right in front  
18 of it, that is hindering and impeding the car.

19 If you are banging on the car, if  
20 you are grabbing the mirror so the driver can't  
21 really go, if you're doing all that, that is not  
22 just like touching the car. That's hindering and  
23 impeding under the law.

24 GRAND JURY: Okay.

25 MS. MECKLENBURG: So for 372 -- any

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1 other questions before I get you to Section 111,  
2 which is the misdemeanor? So this is that whoever  
3 forcefully assaults, resists, opposes, impedes,  
4 intimidates or interferes with any person  
5 designated in Section 114 of this title -- and let  
6 me tell you what 114 is. I added that.

7 It's an officer, employee of the  
8 United States who is engaged in the performance of  
9 the official duties. So that would be our Agent  
10 A. And then I'm going to take you down from that,  
11 from this, to show where the acts constitute only  
12 simple assault and that's all I'm asking for here,  
13 just simple misdemeanor.

14 It's not the felony. It goes on to  
15 talk about a felony, but I don't ask for a felony  
16 here. So this is just the assault -- whoever  
17 assaults, resists, opposes, impedes, intimidates  
18 or interferes with any officer while he is engaged  
19 with his duties has violated Section 111. Yes?

20 GRAND JURY: He was on his way?

21 MS. MECKLENBURG: He was reporting  
22 for his duties. He was about --

23 GRAND JURY: He didn't actually show  
24 up, right?

25 MS. MECKLENBURG: He is two minutes

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1 from getting there, but they impeded him from  
2 getting there.

3 GRAND JURY: He wasn't actually  
4 there yet, correct?

5 MS. MECKLENBURG: I don't know why  
6 that would matter. I'm asking you. You tell me.

7 GRAND JURY: Because the way I'm  
8 reading this is you're interfering with him  
9 getting to his duty, not actually doing his duty.  
10 Not getting to his job.

11 MS. MECKLENBURG: He can't do his  
12 duty if you are impeding him from getting there  
13 and doing it. Did they, along the way, impede and  
14 hinder him in getting there in doing his duty,  
15 getting there to perform his duties?

16 MR. SKIBA: So he was on-site. He  
17 was just about -- he had flashed his badge. He  
18 was on the way to the facility that he manages,  
19 and that's when he was stopped.

20 MS. MECKLENBURG: He's on the  
21 grounds of the facility that he manages.

22 GRAND JURY: He is the manager?

23 MS. MECKLENBURG: He is one of the  
24 people that manages the facility. He is the  
25 [REDACTED]. So he is there to go and

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1 make sure they have staffing, bedding, to answer  
2 public inquiries about things. He is one of the  
3 manager people. He's not in uniform or anything  
4 like that.

5 GRAND JURY: Okay.

6 MS. MECKLENBURG: He's not -- yeah,  
7 he's not in uniform. He's not out there to arrest  
8 people. He is there to just manage the facility  
9 and that was the testimony that he was not in  
10 uniform and that he was there just for the  
11 facility.

12 GRAND JURY: Thank you for that  
13 clarification.

14 MS. MECKLENBURG: Yeah, I'm sorry.  
15 I didn't realize --

16 GRAND JURY: I have another question  
17 about the video.

18 At the start of it, he said he had  
19 to go through a checkpoint with local police?

20 MS. MECKLENBURG: Yes.

21 GRAND JURY: Okay. And at some  
22 point, are we going to hear about their  
23 perspective on this?

24 MS. MECKLENBURG: There are a lot of  
25 different factors that come into this as to

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1 whether local police -- whether their  
2 jurisdictions allow them to get involved in ICE  
3 matters.

4 GRAND JURY: Okay.

5 MS. MECKLENBURG: And I do not want  
6 to touch politics with a ten-foot pole.

7 GRAND JURY: I don't blame you.

8 MS. MECKLENBURG: I can tell you  
9 that Matt and I are both making sure in  
10 approaching this case that we're putting blinders  
11 on to politics. So I'm not --

12 GRAND JURY: I just want to --

13 MS. MECKLENBURG: I'm not telling  
14 you if we go to trial that there won't be  
15 additional witnesses, but keep in mind you're not  
16 here -- we're not here to put on the whole trial,  
17 just the probable cause.

18 GRAND JURY: Oh, I know.

19 MS. MECKLENBURG: And at this point  
20 we might see if those officers are able -- I'll  
21 get to you in one second. Sorry. Able to  
22 testify, but right now calling them, I don't  
23 want -- we don't want to start with their  
24 jurisdiction and have them say "We are not coming  
25 there to help you."

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1 GRAND JURY: Yes. Two parts. Is  
2 the simple assault part of the resisting,  
3 opposing, impeding?

4 MS. MECKLENBURG: Yes. If you do  
5 that, then it's simple assault. You have to have  
6 additional factors for it to be a felony and Matt  
7 and I decided that we are not going to ask you to  
8 find those additional factors for a felony.

9 GRAND JURY: But the conspiracy is a  
10 felony?

11 MS. MECKLENBURG: The conspiracy is  
12 a felony.

13 GRAND JURY: This person wasn't  
14 harmed, but by extension impeding and assaulting  
15 his vehicle, that constitutes simple assault?

16 MS. MECKLENBURG: Yes. You don't  
17 have to touch the person for it. The law does not  
18 require that you actually touch him.

19 And, in fact, let's just say that  
20 you're going to pick up your children at school  
21 and I come along and I stand in front of your  
22 vehicle and I am not moving, I'm not going to let  
23 you go through. Maybe I put my hand on your car  
24 and I push back. I'm hindering you and impeding  
25 you from going to pick up your children. There's

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1 no question.

2 So that's the kind of analogy that I  
3 would use to show that. You don't have to be  
4 personally touched. I don't have to go in the car  
5 and get you. I'm not letting you proceed to where  
6 you're going.

7 GRAND JURY: That's considered  
8 simple assault?

9 MS. MECKLENBURG: Yes, that would be  
10 simple, which is why we're asking for simple, not  
11 felony.

12 GRAND JURY: That's why I go back to  
13 my question and use your analogy.

14 MS. MECKLENBURG: Okay.

15 GRAND JURY: So if the person comes  
16 and stands in front of my car, do I have the right  
17 to drive against him?

18 MS. MECKLENBURG: We are not  
19 going -- we don't need to address that today  
20 because it didn't happen.

21 GRAND JURY: It happened. He moved.

22 MS. MECKLENBURG: It did not happen  
23 that he drove into any of them such that any of  
24 them were actually knocked over, hit.

25 GRAND JURY: It's just luck.

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1 MS. MECKLENBURG: No, it wasn't  
2 luck. Oh, no, it wasn't -- sir, it was not luck.  
3 It was his calmness and his judgment to drive as  
4 slowly as possible as he could and not hit  
5 anybody. It wasn't just luck.

6 GRAND JURY: Let me go back to my  
7 question.

8 MS. MECKLENBURG: Yes.

9 GRAND JURY: So can I drive slowly  
10 without intent of harm to that person who is  
11 standing in front of the vehicle?

12 MS. MECKLENBURG: It would depend on  
13 the circumstances. I don't want to give you  
14 people advice if you go do it and say, oh, no,  
15 Sheri said. I don't want to be the one to tell  
16 you. It would depend on the circumstance.

17 GRAND JURY: The argument is they  
18 are pushing back so they won't get hurt. He was  
19 driving toward them.

20 MS. MECKLENBURG: And my argument to  
21 that would be you saw in the video space all  
22 around where they could have walked away. They  
23 didn't actually have to stay there.

24 Am I losing people?

25 THE COURT REPORTER: We're way over.

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1 MS. MECKLENBURG: I don't want to  
2 lose you. So we could debate all of these  
3 hypotheticals all afternoon, but my next person is  
4 probably screaming about me. So I don't want --  
5 you know, we could debate it.

6 We believe that we have shown you  
7 probable cause for what we are asking for today.  
8 I'm going to tell you that the indictment has  
9 Count 1 under 372, conspiracy for all of these  
10 people, and it says what they were each doing and  
11 then Counts 2 through 7 -- through 6 -- I'm  
12 sorry -- through 7 is a count for each of these  
13 people for the misdemeanor 110 -- 111, and I see  
14 that this printed a little bit off, but if you  
15 sign it, I will get the right one to the court.

16 GRAND JURY: I'm sorry. I have one  
17 last question.

18 MS. MECKLENBURG: Yeah.

19 GRAND JURY: The felony for the  
20 conspiracy --

21 MS. MECKLENBURG: Yes.

22 GRAND JURY: -- I understand we have  
23 to indict, but I didn't think the misdemeanors  
24 were indicted -- because we had something similar  
25 and he charged felony --

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1 MS. MECKLENBURG: Yes, I put it all  
2 in one indictment.

3 Can I bring the misdemeanors without  
4 you? I believe I could.

5 GRAND JURY: I thought you didn't  
6 even need to bring a misdemeanor.

7 MS. MECKLENBURG: I think that's  
8 right. I don't need to.

9 GRAND JURY: Okay. Then I guess  
10 I'm -- why are we --

11 MS. MECKLENBURG: It's all in one  
12 indictment. That's why. Do you want me to go  
13 back and just bring you the conspiracy in an  
14 indictment?

15 Is that what you guys want?

16 MADAM FOREPERSON: No.

17 GRAND JURY: I personally feel the  
18 complete opposite way.

19 MS. MECKLENBURG: Pardon?

20 GRAND JURY: I said I personally  
21 feel the complete opposite way.

22 MS. MECKLENBURG: Okay. You have a  
23 right to feel that way. I told you what I've told  
24 you and it's up to you to decide what you want to  
25 do as a group. You have to deliberate and decide.

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1 If you're going to -- if you have questions, I  
2 will be out there. Okay. Thank you.

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C E R T I F I C A T E

I, STEVEN J. BRICKEY, CSR, RMR, CRR do hereby certify that I reported the proceedings had in the above matter before the Federal Grand Jury in the Grand Jury Room in the United States Court House at Chicago, Illinois, on the 9th day of October, 2025, and that the foregoing is a true and accurate transcript of said proceedings.

 \_\_\_\_\_

Steven J. Brickey, CSR, RMR, CRR  
084-004675

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RE: GRAND JURY ) GRAND JURY  
INVESTIGATION ) NO. 25 GJ 994

BEFORE THE FEDERAL GRAND JURY  
(SPECIAL JUNE, 2024 - GRAND JURY)

COLLOQUY

OCTOBER 16, 2025 - THURSDAY

PRESENT:

THE HONORABLE ANDREW J. BOUTROS,  
Acting United States Attorney

219 South Dearborn Street

Chicago, Illinois 60604

BY SHERI H. MECKLENBURG and

MATTHEW SKIBA

Assistant United States Attorneys.

1 (The Grand Jury, having  
2 reconvened on October 16,  
3 2025, pursuant to adjournment,  
4 met in closed session and  
5 the following proceedings  
6 were had herein. This transcription  
7 does not contain the testimony given at  
8 this proceeding.)

9 (Background discussion and laughing.)

10 MS. MECKLENBURG: So again, Sheri  
11 Mecklenburg and Matthew Skiba. We're here again on  
12 25 GJ 994. It's the same case we were here last  
13 week on.

14 I am back because if you did not --  
15 between the questions and not getting an indictment, 09:21:38  
16 I did not do my job. I did not explain it to you  
17 well enough. I didn't explain the law to you. I  
18 know we were running out of time, and I knew it at  
19 the time, but I realize it's on me. I did not do my  
20 job last week well enough for you. 09:21:52

21 So I'm coming back today with two things.  
22 We're going to learn about the law. I'm going to  
23 explain to you the law again. Actually, Matt's  
24 going to do that part. He's going to do -- we're

1 going to do like a little mini class on the law.

2 GRAND JURY FOREPERSON: Let me make  
3 sure the transcript recorders are on. Yeah. Let me  
4 check.

5 MS. MECKLENBURG: This one here.  
6 What's your last name?

7 MS. MECKLENBURG: Skiba. S-k-i-b-a.

8 MR. SKIBA: Yeah.

9 MS. MECKLENBURG: Yeah. The orange light  
10 is on which means that it's working, right? 09:22:21

11 GRAND JURY FOREPERSON: Does it say RAZ on  
12 it?

13 MS. MECKLENBURG: It sure does. Okay.

14 And the second part -- I'm going to have  
15 three parts. The first one is Matt is going to do a 09:22:28  
16 little class. I won't promise that I won't jump in  
17 a little because I can't help myself, but I will try  
18 not to.

19 The second part will be I am bringing you  
20 testimony today of Agent A. You're going to hear 09:22:40  
21 right from the agent who was driving the car. Let's  
22 see what you think.

23 And the reason that we're doing the law  
24 before we bring you Agent A is so that you know,

1 one, what to listen for; and two, what are relevant  
2 questions.

3 And we'll go over some of your questions  
4 from last week that are not relevant so that you  
5 don't spend your time on irrelevant questions. 09:23:09

6 And then third part will be that we will  
7 discuss the indictment, and we'll talk it through  
8 and see if you think we're missing anything, and  
9 we'll fill it in. And then we'll present the  
10 indictment to you again. 09:23:27

11 Okay. So we're going to start -- and  
12 remember -- well, I'll do that at the end. Okay.  
13 So let's start with Professor Skiba and our class.

14 MR. SKIBA: Good afternoon, everyone.  
15 I'm going to try to make this as not boring as 09:23:45  
16 possible. Will be like going back to school again.

17 So as Sheri alluded to, you know, the  
18 question here is whether there is going to be  
19 probable cause, so the facts that we presented to  
20 you and will present to you match up to what the 09:24:00  
21 elements are and what the law is.

22 So we're going to go through the two  
23 statutes that we are presenting to you in this  
24 indictment, and we're going to kind of walk through

1 some of the language to kind of break it down piece  
2 by piece to tell you what's relevant for probable  
3 cause determination and what's not relevant.

4 So we're going to start with 372, and I  
5 want to make sure this is -- okay. Auto focus. 09:24:33

6 This is -- can everybody see this okay?

7 GRAND JUROR: Yes.

8 MR. SKIBA: Okay. So this is 372, which  
9 the title of the statute is Conspiracy to Impede or  
10 Injure an Officer. 09:24:57

11 And so you have the statutory language  
12 here. I won't read it to you verbatim unless you  
13 want me to, but I've outlined some of the key  
14 language that we're going to be talking about.

15 And so for purposes of this indictment, 09:25:10  
16 here are the elements at the bottom:

17 So you need two or more people to conspire.  
18 And then one of the following. And this is what I  
19 outlined above. So one is to prevent by force,  
20 intimidation, or threat, the discharging of the 09:25:27  
21 duties, to injure an officer of the United States or  
22 its property on account of his lawful discharge of  
23 the duties of his office or while engaged in the  
24 lawful discharge of his duties.

1 I'm going to stop a minute on this one. So  
2 that there was some question about last time, is it  
3 relevant that he's on his way to work.

4 We're going to tell you later on that he  
5 was engaged in his official duties while he was on 09:25:55  
6 his way to work, but regardless, for this statute,  
7 there is "or" here, he's either on account of or  
8 because of the discharge of his duties, or while  
9 engaged in those duties. And then finally, the  
10 other alternative -- 09:26:18

11 MS. MECKLENBURG: Let me stop you.

12 MR. SKIBA: Yeah.

13 MS. MECKLENBURG: So that means that it  
14 doesn't have to be while he's actually doing his  
15 duties. It also means that they are taking their 09:26:25  
16 action -- the conspirators are taking their actions  
17 because of his lawful discharge of his duties.  
18 Because of who he is or what he does.

19 MR. SKIBA: Yeah.

20 MS. MECKLENBURG: So I just wanted to -- 09:26:41

21 MR. SKIBA: Absolutely right.

22 And then finally, and again the only -- for  
23 this second requirement, the one of the following,  
24 you only need to find one of these three are met.

1           But the last one is to injure the property  
2 of an officer of the United States so as to molest,  
3 interrupt, hinder, or impede him.

4           Does anybody have any questions just about  
5 the elements before I drill down into some of the       09:27:05  
6 specific language?

7           GRAND JUROR: What's the count?

8           MR. SKIBA: This is Count 1 of the  
9 indictment.

10           GRAND JUROR: I wasn't here last week.       09:27:18  
11 What is the count?

12           MS. MECKLENBURG: Okay. So you know that  
13 the indictment consists of a single count of 372,  
14 Count 1 for all six people charged. And then we  
15 have six counts of 111. Each person is charged in a   09:27:34  
16 separate count for 111.

17           GRAND JUROR: Okay. Both --

18           MS. MECKLENBURG: 372 and 111. Does that  
19 answer your question?

20           GRAND JUROR: Six people, one count?       09:27:48

21           MS. MECKLENBURG: No. Six people. One  
22 count. First count is for all six.

23           GRAND JUROR: Got you.

24           MS. MECKLENBURG: 372, the conspiracy, and

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1 then a single count for each of them on 111.

2 So each person is charged in two counts.

3 The first, and then their -- whatever their 111 is.

4 GRAND JUROR: Okay.

5 GRAND JUROR: She didn't watch the video. 09:28:08

6 The person that wasn't here last week, that was on a

7 video so maybe that will help you as well.

8 MS. MECKLENBURG: We will play the video  
9 again. Thank you. That's a great point. Somebody

10 here have a question? 09:28:21

11 GRAND JUROR: I wasn't here last week.

12 MS. MECKLENBURG: We'll play the video  
13 again for you. Thanks. That's a great point.

14 GRAND JUROR: Do you have unlimited tries?

15 MS. MECKLENBURG: Do we have -- what did 09:28:31  
16 you ask?

17 GRAND JUROR: Unlimited tries. Like you  
18 keep coming back as many times as you want?

19 MS. MECKLENBURG: Well, I don't think we  
20 have to worry about that. I think we're going to be 09:28:41  
21 just fine.

22 MR. SKIBA: I think the saying is the  
23 second time is the charm.

24 MS. MECKLENBURG: I hope you don't have

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1 your mind made up already that I'm going to need  
2 more tries.

3 MR. SKIBA: Yeah, I think that --

4 MS. MECKLENBURG: Wait, wait, wait. You  
5 just responded like, well, maybe I do. Do you? 09:28:54

6 GRAND JUROR: I mean I'll listen.

7 MS. MECKLENBURG: Do you have an open mind  
8 for deliberation and returning a verdict if the  
9 facts meet the law?

10 GRAND JUROR: Yes. 09:29:06

11 MS. MECKLENBURG: Okay. Is there anybody  
12 here who feels differently? Because if you do, then  
13 you shouldn't deliberate with the -- so you -- you  
14 took a -- you know, you have a duty to -- to have an  
15 open mind and see if the facts fit the law and you 09:29:18  
16 don't get to decide if you like the law or you  
17 don't.

18 I certainly don't get to decide if I like  
19 the law or I don't.

20 And then deliberate and then decide if 09:29:28  
21 those facts fit the law. But if you're telling me  
22 now -- and you have a right to say to me, this is  
23 the case I just don't like and I just can't do it.  
24 If that's true, then tell us now.

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1 MR. SKIBA: Yes, sir.

2 GRAND JUROR: Are you actually presenting  
3 any new actual facts or just a different viewpoint  
4 on your side?

5 MS. MECKLENBURG: Okay. I'm feeling the 09:29:52  
6 skepticism already. Are you going to be able to  
7 listen with an open mind? Tell me the truth.

8 GRAND JUROR: I -- no.

9 MS. MECKLENBURG: Okay. Then you have to  
10 go -- 09:30:04

11 GRAND JUROR: I heard this case like last  
12 week and I thought it was a crock of shit then and I  
13 still think it is.

14 MS. MECKLENBURG: Okay. Thank you for your  
15 opinion for everybody. 09:30:12

16 GRAND JUROR: Uh-huh.

17 MS. MECKLENBURG: I kind of had that  
18 impression from last week, but thank you.

19 GRAND JUROR: Do you have any evidence  
20 other than the (inaudible) -- 09:30:17

21 MS. MECKLENBURG: Have a good evening.  
22 Pardon me?

23 GRAND JUROR: I'm (inaudible) -- no new  
24 evidence?

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1 MS. MECKLENBURG: I didn't say there is no  
2 new evidence.

3 (Inaudible.)

4 If you feel that you can't be -- then  
5 excuse yourself. That's fine. There is still 16? 09:30:36

6 GRAND JURY FOREPERSON: Let's see what we  
7 have now.

8 MS. MECKLENBURG: One, two, three --

9 GRAND JUROR: 17.

10 MS. MECKLENBURG: Okay. That's fine. 09:30:44

11 MR. SKIBA: I'll just wait until --

12 GRAND JUROR: That's fine.

13 MS. MECKLENBURG: Now we'll all be doing

14 (Inaudible.)

15 GRAND JURY FOREPERSON: We have to remember 09:31:11

16 we're recording as well, so that when the court  
17 reporter does this transcript we're not talking over  
18 each other.

19 MS. MECKLENBURG: Yes. Okay. I'm sorry.

20 I'll ask Matt to continue. 09:31:26

21 And thank you to those of you who are  
22 staying with an open mind.

23 MR. SKIBA: So we're going to -- we're  
24 going to just break down some of the more specific

1 language in each of these statutes. So, we're going  
2 to start with the felony count, and that's 372  
3 again.

4 So I went through the elements. I'm going  
5 to break it down a little bit more specifically. So 09:31:52  
6 this is what one court said about what Section 372  
7 means.

8 This court said: 327 is straightforward.  
9 It prohibits individuals from conspiring to keep  
10 government employees from doing their jobs. 09:32:07

11 And I think what you -- what we were going  
12 to -- what the evidence will show and what you will  
13 hear from Agent A is that there was a group of  
14 individuals. They conspired to keep him from doing  
15 his jobs. His job. Excuse me. 09:32:22

16 And so the question, one of the questions  
17 last week is: What is a conspiracy? And so a  
18 conspiracy is an express or implied agreement  
19 between two or more persons to commit a crime.

20 So breaking that down further. An 09:32:42  
21 implied agreement. So you don't need to have people  
22 come together and say, I am -- let's form a  
23 conspiracy to commit this crime. It could be  
24 implied by their conduct.



1 some actions.

2           They were -- you know, there was a  
3 concerted effort to block this, Agent A, from doing  
4 his job.

5           Any other questions about what I have           09:34:22  
6 up here? I'm going to go now into the force,  
7 intimidation, and threat language as well as part of  
8 the statute.

9           Okay. So next I'm going to put up here the  
10 next question: What is force, intimidation, or           09:34:40  
11 threat?

12           So this, this case that I have referenced  
13 here out of the Western District of Texas is for a  
14 comparable statute. This is a criminal statute that  
15 we are charging here, but there is a civil statute           09:34:57  
16 that is more or less the identical language that  
17 also has this force, intimidation, or threat  
18 language.

19           Now, this was a case -- and you can see  
20 it here -- surrounding a bus with about a hundred           09:35:14  
21 cars in the interstate and attempting to control its  
22 movements by physically blocking with their vehicles  
23 and driving dangerously, could reasonably constitute  
24 force.

1           Now, we are not saying that you need to  
2 find that it rose to this level of seriousness, but  
3 the point is, in this case out of the Western  
4 District of Texas, what the court says, the vehicles  
5 surrounded another vehicle and physically blocked it 09:35:43  
6 and stopped it from going forward.

7           That, in that case, constituted force,  
8 intimidation, or threat.

9           What this case also says is, and this a  
10 direct quote above: The most commonly understood 09:35:58  
11 dictionary definition of intimidate is to place a  
12 person in fear.

13           Now, as you're going to hear from  
14 Agent A in a little bit, you're going to find out  
15 that he was in fear for his own life and safety 09:36:12  
16 because of the actions of the co-conspirators.

17           Does anybody have any questions about  
18 this portion of the statute? Okay.

19           And this is just a preview of what's to  
20 come and a recap from last week. 09:36:31

21           So here is what we expect Agent A to  
22 further testify to, and here is what we think the  
23 facts show:

24           That there was a conspiracy implied by the

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1 conduct of the co-conspirators. They surrounded the  
2 car. They banged on his car windows. Some of them  
3 were scratching the car. There was chants related  
4 to his, Agent A's duties as an ICE Officer.

5           And as -- as the evidence shows as well,           09:37:07  
6 each of these individuals named in the indictment  
7 performed actions that constitute force,  
8 intimidation, or threat. And I understand some of  
9 this is going to be new for some folks, but this is  
10 going to be reviewed for others. We're going to           09:37:28  
11 show the --

12           GRAND JUROR: I have a question. I'm  
13 sorry. Will you go over the names real quick?

14           MS. MECKLENBURG: Yeah. These are the six  
15 people in the indictment. And, Matt, you can go           09:37:39  
16 over that with them. And then what we are going to  
17 do right after this is show the video again for  
18 those who haven't seen it and to remind those who  
19 have, and we'll point out each of the people and  
20 what they were doing.           09:37:51

21           Go ahead, Matt.

22           MR. SKIBA: Okay. So does anybody, any  
23 folks who are new, do they -- do we know the names  
24 Michael Rabbitt, Kat Abagazala (phonetic spelling),

1 Kat Sharp, Brian Straw, Andre Martin, or Joslyn  
2 Walsh?

3 Does anybody know these individuals?

4 Okay. Seeing none.

5 So as I was referencing before, the 09:38:15  
6 evidence of -- that we discussed last week, the  
7 video, the testimony that from last week and today  
8 is going to show that each of these individuals  
9 conspired, formed a conspiracy and used force,  
10 intimidation, or threats that directly hindered and 09:38:34  
11 impeded Agent A from doing his job.

12 So as the video shows, Michael Rabbitt hung  
13 on to the passenger side door -- excuse me -- the  
14 passenger side of the car. He pushed and banged on  
15 the side of the car. 09:38:54

16 Kat Abagazala placed herself in the front  
17 of the vehicle. She pushed on the front of the  
18 vehicle with her hands and body to prevent the car  
19 from continuing. And Kat Sharp did the same.

20 And Brian Straw similarly moved through 09:39:11  
21 the crowd to the front of the vehicle and, like Kat  
22 Abagazala and Kat Sharp, he pushed up against it  
23 with his hands and leveraged his body to prevent it  
24 from continuing.

1 MS. MECKLENBURG: Just to remind you,  
2 he was the big guy with the orange hat. And when  
3 you see the video, I want you to notice he is not at  
4 the front of the vehicle at the beginning. He  
5 pushes his way through the crowd to get there so 09:39:34  
6 that he can continue with the rest of the people to  
7 impede him.

8 Go ahead.

9 MR. SKIBA: Okay. Yeah. And similarly  
10 with Andre Martin, like Kat Abagazala and Kat Sharp, 09:39:48  
11 he placed himself in the front of the vehicle. He  
12 placed on -- he pushed on the front of the vehicle  
13 with his hands and body to prevent the vehicle from  
14 continuing.

15 And finally, Jocelyn Walsh. She was the 09:40:00  
16 individual with the guitar. She wrapped her arm  
17 around the driver's side mirror and again prevented  
18 the vehicle from continuing.

19 And it's important to note, and as we  
20 expect you to hear from Agent A, it's not that 09:40:19  
21 these -- like these individuals had no choice but to  
22 be in the front of vehicle as his car was going.

23 Now, each one of them had the  
24 opportunity to move out of the way and to let

1 Agent A move forward; but no, this was like a  
2 concerted effort by these individuals to prevent  
3 Agent A from doing his job which, again, we're  
4 talking about what this statute is about.

5 Here is, again, what the court said. It's 09:41:00  
6 a straightforward statute. It prohibits individuals  
7 from conspiring to keep employees from doing their  
8 jobs.

9 Does anybody have any questions?  
10 And we'll talk about the statute more, but does 09:41:15  
11 anybody have any initial questions about this  
12 statute so far?

13 GRAND JUROR: That's very helpful. Yeah.

14 MR. SKIBA: Okay. Seeing no questions  
15 about that, I'm going to next turn to the 09:41:30  
16 misdemeanor count, which is 18 United States Code  
17 at 111. And this statute is called Assaulting,  
18 Resisting or Impeding Certain Officers or Employees.

19 And again, I won't read this statute  
20 verbatim. We have it here. But here is the 09:41:49  
21 elements for this charge:

22 Well, the first element is that it needs to  
23 be forcible, and the actions, assault, resist,  
24 opposes, impedes, intimidates or interferes.

1           There needs to be a federal officer, and  
2 the actions that were -- the forcible assault,  
3 resist, oppose, etcetera, those actions were while  
4 the officer was engaged in or was on account of the  
5 performance of his official duties.

09:42:25

6           So, one question from last week is, well,  
7 this individual was on the way to, on the way to  
8 work. Does that matter?

9           And the answer is no. The first  
10 reason that it doesn't matter is the statute  
11 required that he be engaged in his official duties,  
12 or the incident must be on account of his official  
13 duties or because of his official duties.

09:42:43

14           And as the evidence shows, at a  
15 minimum, these conspirators targeted Agent A  
16 on account of or because of his official duties  
17 related to ICE.

09:43:02

18           But regardless, as the law shows or the  
19 case law shows, if an individual is commuting to  
20 work in a government issued automobile, and that  
21 automobile is for work-related purposes only, and  
22 that individual is duty bound to ensure that nothing  
23 bad happens to that automobile, that can qualify as  
24 being engaged in his official duties.

09:43:22

1           And as you're going to hear in a little  
2 bit from Agent A, this is precisely what was the  
3 case here.

4           This was a government issued SUV. He  
5 was not allowed to use it for personal use. And it     09:43:52  
6 was his duty to ensure that nothing bad happened to  
7 his car.

8           MS. MECKLENBURG: And that, is it fair to  
9 say that was the definition that would include that  
10 he was engaged in duties --                             09:44:09

11           MR. SKIBA: Correct.

12           MS. MECKLENBURG: -- and on account of  
13 duties if they were attacking him because he was a  
14 ICE agent, that would be because of his duties.

15           MR. SKIBA: That's right.                     09:44:18

16           MS. MECKLENBURG: So there is two different  
17 ways that you can go.

18           MR. SKIBA: The next question, I believe  
19 this was also a question raised last week:

20           Did Agent A need to be assaulted? And the     09:44:30  
21 answer to that is also no.

22           Section 111 applies to those who act  
23 forcibly and resist, oppose, impede, and intimidate  
24 an officer, again while engaged in or on account of

1 his official duties.

2 And then finally, on this particular  
3 statute, what does forcible mean?

4 Well, here is what the Seventh Circuit --  
5 we are in the Seventh Circuit. Here is what the 09:45:02  
6 pattern jury instructions define "forcibly" to mean.

7 And this is a quote: Forcibly means by  
8 use of force. Physical force is sufficient, but  
9 actual physical contact is not required.

10 A person also acts forcibly if he 09:45:20  
11 threatens, attempts to inflict bodily harm upon  
12 another with a present ability to inflict bodily  
13 harm, but also here, direct contact is not required  
14 so long as the conduct places the officer in fear  
15 for his life or safety. 09:45:37

16 And again, as you're going to hear in a  
17 little bit, Agent A, we expect him to testify that  
18 he was in fear for his life and safety.

19 If nobody has any questions about  
20 Section 111, we just identified a few handful of 09:45:52  
21 additional questions that came up last week, and  
22 we are -- we had some answers for you here.

23 So the first is: What is the -- what  
24 should Agent A have done? Shouldn't he have stopped

1 his car?

2 And the answer to that is -- there is a  
3 couple of different questions to that of no.

4 So neither statute we are presenting today,  
5 that's Section 372 or 111, requires that he had 09:46:25  
6 stopped his vehicle, so that's irrelevant.

7 It's not a personal injury case where the  
8 question is who is at fault. The question is are --  
9 is there probable cause to believe that the elements  
10 of 111 and 372 are met. 09:46:42

11 But here is the more fundamental point.  
12 Even if he had stopped his, his car, if he had  
13 stopped it completely before reaching the gate,  
14 there was still hindering, impeding him from getting  
15 to the gate and further doing his job. 09:47:00

16 And he did not have a duty to retreat. And  
17 as you're going to hear, again, you're going to hear  
18 from Agent A that what he was concerned about, he  
19 had a concern that if he had stopped his car, he  
20 would have been a sitting duck. If he had feared 09:47:18  
21 that these individuals that were surrounding his car  
22 and stopping him from moving forward were going  
23 to pull him -- were going to break his window and  
24 were going to pull him out of the car.

1           The next question is: What about some of  
2 the other witnesses?

3           There was a truck driver in the area.  
4 There was police.

5           We believe that the video and the testimony 09:47:41  
6 is plain as day. We only need to establish probable  
7 cause, which does not require us and the Grand Jury  
8 to present every conceivable witness to this event.

9           Next question: What about the other  
10 individuals who were surrounding the car? 09:48:01

11           At this stage it's irrelevant. We have  
12 named six individuals responsible in the indictment  
13 and that's all -- the only question is, is there  
14 probable cause to believe that they committed these  
15 offenses. 09:48:19

16           And the final question that came up is,  
17 well, this is a -- the 111 charge is a misdemeanor.  
18 Can the government charge the misdemeanor to another  
19 Grand Jury?

20           Well, the important point is we are in 09:48:37  
21 this case charging both a felony and a misdemeanor,  
22 and because we are seeking a felony, cannot -- it's  
23 called bifurcate. We can't pick and choose what we  
24 are presenting to the Grand Jury today.

1           And so we're going to ask you to return a  
2 true bill on each count including Section 111,  
3 misdemeanors.

4           Again, the question on that is probable  
5 cause, that the facts that we presented and will       09:49:02  
6 present marry up to the law that we presented.

7           MS. MECKLENBURG: Show them the video now.

8           MR. SKIBA: Certainly.

9           MS. MECKLENBURG: -- (Inaudible)

10          MR. SKIBA: Certainly. Yes. Thank you.       09:49:22

11          Folks, just bear with me as I'm working  
12 through the technology here.

13          The video that we're going to present,  
14 they are going to be reviewed for the folks who were  
15 here last week. But for others it's going to be       09:49:41  
16 brand new. So --

17          MS. MECKLENBURG: And we'll stop it so  
18 you can see each defendant. And if you need us to  
19 go through the identification at the end again of  
20 how we identified each defendant, if we have to do       09:49:58  
21 that we will. I don't know that we'll have time,  
22 but we'll do whatever we can, but I definitely want  
23 to get Agent A in today.

24          And I know this is your last week because

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1 of the shutdown so --

2 GRAND JUROR: We're not sure yet.

3 MS. MECKLENBURG: You have a question?

4 GRAND JUROR: No. I don't think I can

5 vote. 09:50:17

6 MS. MECKLENBURG: Okay.

7 Do we still have 16?

8 GRAND JURY FOREPERSON: Yes. We have 16.

9 MS. MECKLENBURG: Okay.

10 MR. SKIBA: I'm just working on -- on the 09:50:30

11 videos.

12 MS. MECKLENBURG: I'm sorry. Pardon me?

13 What's that?

14 GRAND JUROR: We do have new evidence? We

15 do have new evidence -- 09:50:44

16 MS. MECKLENBURG: Yes, we do. We have new

17 evidence.

18 And when you took your --

19 GRAND JUROR: Oath.

20 MS. MECKLENBURG: -- oath, that oath didn't 09:50:54

21 say, do you like the law, do you like the facts?

22 It's can you be fair? And that's all we're asking.

23 MR. SKIBA: Sheri, a question.

24 GRAND JUROR: I noticed -- it is the

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1 individuals -- (inaudible) if we decide what five of  
2 the six you're like a hundred percent, but not the  
3 sixth, can we --

4 MS. MECKLENBURG: If that's what you  
5 decide, yes, you can. 09:51:24

6 GRAND JUROR: Okay. So it's not all of  
7 them together?

8 GRAND JUROR: We can do each count  
9 individually.

10 MS. MECKLENBURG: We can do each count 09:51:27  
11 individually.

12 (Inaudible.)

13 You were not here last week. Okay.

14 MR. SKIBA: Sheri, of course I'm having  
15 technical difficulties. 09:51:40

16 MS. MECKLENBURG: Are you plugged in?

17 MR. SKIBA: I assume I'm plugged in to  
18 the -- the mike --

19 MS. MECKLENBURG: The drive. Whatever you  
20 have -- (inaudible) 09:52:06

21 MR. SKIBA: I just had it on.

22 Folks, just bear with me one moment while I  
23 get the technology down.

24 GRAND JUROR: Don't worry.

1 MS. MECKLENBURG: I will say I'm a little  
2 disappointed that there are people who didn't want  
3 to hear the agent. Disappointed.

4 GRAND JURY FOREPERSON: You know, I would  
5 say one thing. When the USA (inaudible) -- was here 09:52:50  
6 last week, the one thing he said that made so much  
7 sense -- can I say it?

8 MS. MECKLENBURG: Yes.

9 GRAND JURY FOREPERSON: This is the  
10 accusatory phase, not the guilt-finding phase. 09:52:58

11 MS. MECKLENBURG: Right.

12 GRAND JURY FOREPERSON: So those are very  
13 different things, and our burden of proof is much  
14 lower than if we have a trial we have to prove that  
15 these people did something.

16 GRAND JUROR: To be fair, we only hear one  
17 half of the story. We don't hear the other half.

18 MS. MECKLENBURG: That's true. We can't --  
19 say like when you only hear one half, of course  
20 whatever you say is going to sound good because 09:53:19  
21 we're only hearing from you. But -- I mean,  
22 absolutely. Yes. But I think that's a great point,  
23 and I'm glad that you told me, and I'll remember to  
24 say --

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1 GRAND JURY FOREPERSON: Yes.

2 MS. MECKLENBURG: Okay.

3 MR. SKIBA: All right. So this is the  
4 first video.

5 MS. MECKLENBURG: Driver's side. 09:53:40

6 MR. SKIBA: Yeah. This is the driver's  
7 side.

8 GRAND JUROR: Okay.

9 MR. SKIBA: And so I'll play this video.  
10 I'm happy to stop or go back at any point. Just let 09:53:46  
11 me know.

12 MS. MECKLENBURG: Stop at each of the  
13 defendants.

14 MR. SKIBA: Yeah. Uh-huh. And I may be --  
15 some of these are quick, so I may be rewinding a 09:53:56  
16 little bit.

17 Okay. So, right up off the bat we have  
18 three of our defendants right here. So, this  
19 individual right here is Andre Martin. This  
20 individual here is Kat Abagazala. And this 09:54:13  
21 individual here is Kat Sharp, the redhead. And I'm  
22 going to play this now.

23 (Footage played.)

24 MR. SKIBA: And we have a fourth. I'm just

1 going to rewind a little bit. The girl who's about  
2 to get hit with a stuffed animal which is thrown by  
3 not the ICE agent, by one of the other individuals,  
4 that is Jocelyn Walsh.

5 MS. MECKLENBURG: And you can see her 09:54:52  
6 guitar in the window. Joslyn Walsh is the guitar  
7 lady.

8 MR. SKIBA: Yeah.

9 (Footage played.)

10 MR. SKIBA: Okay. I think -- 09:55:09  
11 (Footage played.)

12 MS. MECKLENBURG: You can see there  
13 is a truck behind that they are not bothering at all  
14 because he's not a ICE agent. That would be --

15 MR. SKIBA: Yeah. And as you can hear, 09:55:51  
16 what they are saying is, quit your job. So they --  
17 they know that this is an individual associated with  
18 the Broadview facility.

19 (Footage played.)

20 So I'm going to go to the next video here. 09:56:10

21 (Footage played.)

22 That's a different angle. And here again,  
23 you have Kat Abagazala. You have Andre Martin right  
24 here.

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1 MS. MECKLENBURG: Right behind Kat is --

2 MR. SKIBA: Yes. Yes. Sticking out right  
3 here is Kat Sharp.

4 (Footage played.)

5 MS. MECKLENBURG: You can see Brian Sharp 09:56:52  
6 just moved in. Sorry, Matthew.

7 MR. SKIBA: Brian Rabbit.

8 MS. MECKLENBURG: Right.

9 MR. SKIBA: This individual here, if you  
10 follow his arm he is placing -- 09:56:59

11 MS. MECKLENBURG: Michael Rabbit.

12 MR. SKIBA: I'm sorry?

13 MS. MECKLENBURG: Michael Rabbit.

14 MR. SKIBA: Yes. Michael Rabbit.

15 MS. MECKLENBURG: Mr. Rabbit. 09:57:07

16 MR. SKIBA: Yes. We'll call him  
17 Mr. Rabbit. Thank you.

18 So he is right here. He's on the side of  
19 the vehicle. He has his hand placed -- I believe  
20 what the agent said last week is the A-frame. I'm 09:57:19  
21 not a car guy. I'm just going to call that the car.  
22 The side of the car.

23 (Footage played.)

24 MR. SKIBA: And -- I'm going to go back.

1 This individual right here is Mr. Straw.

2 MS. MECKLENBURG: Watch his --

3 (Footage played.)

4 MS. MECKLENBURG: (Inaudible) If they

5 wanted to -- 09:58:10

6 MR. SKIBA: And here he is right here

7 again.

8 MS. MECKLENBURG: Watch.

9 MR. SKIBA: And here is actually Mr. Rabbit

10 as well. 09:58:16

11 (Footage played.)

12 MS. MECKLENBURG: Ran up to the car.

13 MR. SKIBA: Yeah. And you could see,

14 I mean look at how much room there is for

15 Mr. Straw to maneuver if he wanted to. But he 09:58:48

16 intentionally went to the front of the vehicle.

17 (Footage played.)

18 MR. SKIBA: So I think -- does anybody need

19 to see any parts of the video again?

20 GRAND JUROR: Do you bring up later for the 09:59:33

21 testimony exactly what they're saying? I can't

22 always understand what they are shouting

23 (inaudible).

24 MS. MECKLENBURG: I think that we can tell

1 you because -- the agent, they are hearing lots of  
2 things, so we can tell you because if you hear it,  
3 you decide if you can hear what we hear. So you  
4 listen to it.

5           They are screaming -- excuse my language.           09:59:56  
6 I'm just repeating what they are saying. And I'm  
7 not supposed to swear in the Grand Jury. Fuck this  
8 pig. Over and over. Fuck this pig. Fuck this pig.  
9 They are screaming --

10           MR. SKIBA: Get a real job.                           10:00:08

11           MS. MECKLENBURG: Yes.

12           MR. SKIBA: Shame.

13           MS. MECKLENBURG: Shame. And they are  
14 screaming something like, down with deportation.

15           MR. SKIBA: Up with liberation.                       10:00:17

16           MS. MECKLENBURG: Up with liberation.

17           MR. SKIBA: Yes, ma'am.

18           GRAND JUROR: They were also clearly  
19 saying, I believe that we will win.

20           MS. MECKLENBURG: Yes. That's right.               10:00:26

21           MR. SKIBA: Yeah. And through the agent --  
22 I'm sorry.

23           MS. MECKLENBURG: There is another  
24 question.

1 GRAND JUROR: Is there a part of the video  
2 where someone hanging on to the passenger side  
3 mirror?

4 MS. MECKLENBURG: Yes.

5 GRAND JUROR: Is that the same guy you 10:00:36  
6 already identified or is that --

7 MS. MECKLENBURG: Yes. That was  
8 Mr. Rabbit. Michael Rabbit.

9 GRAND JUROR: No, different --

10 MR. SKIBA: It might be a different 10:00:45  
11 individual.

12 GRAND JUROR: I don't know if it was one of  
13 the eight or not.

14 MS. MECKLENBURG: It --

15 GRAND JUROR: It was on the list. It said 10:00:55  
16 she wrapped her arm --

17 GRAND JUROR: Driver's side.

18 MR. SKIBA: Do you want me to rewind?

19 GRAND JUROR: Yes.

20 MS. MECKLENBURG: I want to make sure 10:01:06  
21 everybody -- (inaudible)

22 Last time and today we showed you pictures  
23 of the damage to the car and the mirror was broken  
24 off. Yes. I just want to make sure --

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1 MR. SKIBA: Yes.

2 MS. MECKLENBURG: I know it's hard.

3 MR. SKIBA: I'll play it from here, and if  
4 you want me to pause it at any point let me know.

5 (Footage played.) 10:01:30

6 MR. SKIBA: Yeah. So this is from -- my  
7 cursor is on Mr. Rabbit right here.

8 (Footage played.)

9 MS. MECKLENBURG: There. The guy with the  
10 hood up. 10:02:16

11 MR. SKIBA: Okay. So --

12 MS. MECKLENBURG: That's the one who was  
13 grabbing the mirror where the other guy was just  
14 holding the car. When you just say just holding --

15 MR. SKIBA: Yes. 10:02:25

16 MS. MECKLENBURG: The difference, grabbing  
17 the mirror --

18 MR. SKIBA: Yes.

19 MS. MECKLENBURG: It doesn't mean we don't  
20 come back if we can identify someone, but we're 10:02:32  
21 being very careful that we have people identified  
22 clearly.

23 And since you weren't here last time, I  
24 just want to tell the people who weren't. We went

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1 through the identities. We went through that the  
2 agent took still shots from the video and they found  
3 pictures of people, and many of these people posted  
4 this on their own social media. So it wasn't -- it  
5 was clear that they put it up. And they compared 10:02:55  
6 the known photos of these six with the stills from  
7 the video.

8 MR. SKIBA: Any other questions either  
9 about the videos or the law?

10 GRAND JUROR: Who took the videos? What's 10:03:12  
11 the source of these videos?

12 MS. MECKLENBURG: This video is from  
13 Ms. Abagazala's social media.

14 MR. SKIBA: Yeah. So some were like a  
15 Twitter, an Instagram. Some were, I believe, You 10:03:25  
16 Tube. This was all civilians taking photos.

17 MS. MECKLENBURG: Yeah. No law enforcement  
18 was out there, so they didn't take any video.

19 Any questions before I go get who we now  
20 know as Agent A and in a minute you're going to know 10:03:49  
21 him as who he is.

22 GRAND JUROR: Would you be able to show,  
23 you know, after Agent A or before, the damage to the  
24 car?

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1 MS. MECKLENBURG: We're going to go  
2 through it with Agent A, and then if you need it  
3 again, we will. We'll pull up the pictures. That's  
4 what I'll need for that. (Inaudible). Okay.

5 (Inaudible.)

6 I'll tell you [REDACTED]. [REDACTED] is  
7 the first name. [REDACTED] is [REDACTED].

8 GRAND JUROR: Okay.

9 MS. MECKLENBURG: That's his name.

10 GRAND JUROR: Okay.

10:04:25

11 (Whereupon the witness came in the jury  
12 room, and the testimony is not included in  
13 this transcript.)

14 (End of excerpt of

15 25 GJ 994 [REDACTED].)

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24

1 C E R T I F I C A T E

2

3 JEANINE WATKINS, being first duly sworn, on  
4 oath says that she is a Certified Shorthand Reporter  
5 doing business in the City of Elgin, County of Kane,  
6 and the State of Illinois;

7 That she reported in shorthand the  
8 foregoing audio recording of the proceedings of the  
9 Federal Grand Jury in the Grand Jury Room in the  
10 United States Courthouse in Chicago, Illinois;

11 That all speakers have been identified  
12 within the transcription based on the content of the  
13 said audio recording;

14 And that the foregoing is a true and  
15 correct transcript of her shorthand notes so taken  
16 as aforesaid and contains the full content of the  
17 said audio recording which was audible and  
18 discernible.

19

20

*Jeanine Watkins*

21

JEANINE WATKINS, C.S.R.

22

C.S.R. License No. 084-001629

23

24

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Page 1

RE: GRAND JURY ) GRAND JURY

INVESTIGATION ) NO. 25GJ994

BEFORE THE FEDERAL GRAND JURY  
(SPECIAL JUNE, 2024 - GRAND JURY)

OCTOBER 16, 2025 - THURSDAY

PRESENT:

THE HONORABLE ANDREW J. BOUTROS,  
Acting United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604

BY MS. SHERI H. MECKLENBURG and  
MR. MATTHEW SKIBA  
Assistant United States Attorneys.

2025 10 16 25GJ994 [REDACTED]

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I N D E X

WITNESS: DENNIS [REDACTED]	PAGES
Direct Examination by Ms. Mecklenburg	3 - 17

EXHIBITS:

(No exhibits identified.)

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Page 3

1 (The Grand Jury, having  
2 reconvened at 2:43 p.m.  
3 on the 16th day of October,  
4 2025, pursuant to adjournment,  
5 met in closed session and  
6 the following proceedings  
7 were had herein.)

8 GRAND JURY FOREPERSON: Good afternoon.  
9 You could just stand over there by the chair. And  
10 please raise your right hand.

11 State and spell your name for the record.

12 THE WITNESS: [REDACTED]. [REDACTED],  
13 [REDACTED].

14 GRAND JURY FOREPERSON: Do you solemnly  
15 swear or affirm that in the testimony you are about  
16 to give before this Grand Jury, to tell the truth,  
17 the whole truth, and nothing but the truth, so help  
18 you God?

19 THE WITNESS: Yes.

20 GRAND JURY FOREPERSON: Thank you.

21 (The witness was duly sworn.)

22 WHEREUPON:

23 [REDACTED]

24 having been first duly sworn, was examined and

2025 10 16 25GJ994 [REDACTED]

Page 4

1 testified as follows:

2 DIRECT EXAMINATION

3 BY MS. MECKLENBURG:

4 Q. Good afternoon, Agent [REDACTED].

5 You already said your name and spelled it 15:10:44

6 for us, correct?

7 A. Yes, ma'am.

8 Q. Okay. Tell us, what is your current job?

9 A. Currently I'm the [REDACTED]

10 [REDACTED] with Immigration 15:10:53

11 and Customs Enforcement.

12 Q. And that's traditionally known as ICE,

13 right?

14 A. Yes, ma'am.

15 Q. And you said you were -- tell me your 15:11:39

16 position again so that I can have it right.

17 A. [REDACTED]

18 Q. Okay. How long have you been with ICE?

19 A. I've been with ICE since 2001. So 24

20 years. 15:12:04

21 Q. And how long have you been the Assistant

22 Field Office Director?

23 A. I have been [REDACTED]

24 for eight years, but just six months in [REDACTED]

2025 10 16 25GJ994 [REDACTED]

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1 Q. So you're based in [REDACTED]?

2 A. Yes, ma'am.

3 Q. Can you describe in general your duties?

4 A. So, as the [REDACTED]

5 [REDACTED] I serve as a second-line supervisor for 15:12:44

6 office. I oversee two offices, in [REDACTED]

7 [REDACTED]

8 So I have supervisors that work under me,

9 and then agents that work under, under them. So, I

10 oversee really all the levels of the operation 15:13:15

11 there.

12 Q. Okay. Do you oversee intake processing,

13 processing, event space, and transportation

14 coordination to those who are temporarily detained

15 in Broadview? 15:13:57

16 A. Yes. Currently I'm detailed up here for

17 that role. Yes.

18 Q. And I'll ask you about that in a minute.

19 Do you also communicate with upper

20 management and federal partners to manage operations 15:14:12

21 and ensure that you have the necessary supplies and

22 manpower and proper staffing levels for what's

23 needed?

24 A. Yes, ma'am.

2025 10 16 25GJ994 [REDACTED]

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1 Q. And do you also respond to requests for  
2 information both internally and from the public?

3 A. Yes, ma'am.

4 Q. Now, you said you're based in [REDACTED].

5 What was your assignment there on September 26, 15:14:51  
6 2025?

7 A. I was assigned to assist the permanent  
8 AFOD. They are at Broadview. And to report to work  
9 there and help him oversee operations there.

10 Q. Where was the location that you were 15:15:20  
11 directed to report for carrying out the duties that  
12 day?

13 A. The address is 1930 Beach Street in  
14 Broadview, Illinois.

15 Q. That's the Broadview facility that we've 15:15:43  
16 been talking about, right?

17 A. Yes, ma'am.

18 Q. What was your first day reporting, well --  
19 so let's turn to September 26 at approximately 7:45  
20 in the morning. 15:16:10

21 Why were you going to the -- were you going  
22 to the Broadview facility at that time?

23 A. Yes, ma'am.

24 Q. And why?

2025 10 16 25GJ994 I [REDACTED]

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1 A. That's the -- my duty assignment, at least  
2 for this detail, and I was reporting to work as part  
3 as my normal course of duties.

4 Q. Did you go -- what were you wearing that  
5 day?

15:16:54

6 A. I -- I was wearing a polo shirt, similar to  
7 this. Slacks. And I was wearing a jacket over --  
8 over top of everything.

9 Q. Were you wearing any kind of mask, helmet,  
10 anything?

15:17:25

11 A. No, ma'am.

12 Q. Did you go directly from where you were  
13 staying? Did they put you up in a hotel or  
14 something for you to be in Chicago?

15 A. Yes, ma'am.

15:17:44

16 Q. Okay. Did you go directly from -- were you  
17 going from the hotel to the Broadview facility?

18 A. Yes, ma'am.

19 Q. And can you describe the car that you were  
20 driving?

15:18:04

21 A. So I was driving a black Ford Expedition.

22 Q. Was it -- oh. I'm sorry.

23 A. It's a 2022 Ford Expedition.

24 Q. Was it government-owned vehicle?

2025 10 16 25GJ994 [REDACTED]

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1 A. Yes, ma'am. It's a government-owned  
2 vehicle.

3 Q. Was it marked as a law enforcement vehicle  
4 in any way?

5 A. No. It -- it's -- it's designed to be -- 15:18:39  
6 to blend in, I suppose.

7 Q. When were you first assigned that car?

8 A. In April of 2025.

9 Q. Are you permitted to use that car for  
10 non-work purposes? 15:19:13

11 A. No.

12 Q. So if you want to go out to dinner with  
13 your family on a Sunday night, are you allowed to  
14 use that car?

15 A. No. 15:19:27

16 Q. What are your duties with regard to that  
17 car?

18 A. Well, any time that I need to carry out  
19 a -- any duties I will -- I will be in my -- my  
20 government-furnished vehicle, and including home to 15:19:51  
21 work. You know, trans --

22 Q. I'm sorry. Let me stop you for a minute.

23 UNKNOWN SPEAKER: The battery is died.

24 THE WITNESS: Sorry, the --

2025 10 16 25GJ994 I [REDACTED]

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1 MS. MECKLENBURG: That was just the  
2 computer. We'll get it back up when I want to show  
3 pictures.

4 UNKNOWN SPEAKER: Okay. We're have a  
5 battery --

15:20:26

6 BY MS. MECKLENBURG:

7 Q. Thank you for keeping me honest.

8 But I think you misunderstood my question.

9 Do you have any duties with regard to keeping the  
10 safety and condition of that car?

15:20:43

11 A. Yes. I mean that's part of being assigned  
12 a government vehicle is to care and maintain that  
13 vehicle.

14 Q. What was the condition of the car prior to  
15 September 26, 2025?

15:21:11

16 A. It was -- I mean it was in great condition.

17 Q. Did it have any broken parts?

18 A. No.

19 Q. Did it have any scratches?

20 A. No.

15:21:37

21 Q. How did you -- how do you know that it  
22 didn't?

23 A. Well, because, like I said, part of my job  
24 is to care for and maintain that vehicle, and also

2025 10 16 25GJ994 I [REDACTED]

Page 10

1 to report any time there is damage, you know, to the  
2 vehicle.

3 So, pretty much daily I walk around it and  
4 make sure that it's as it's supposed to be so that I  
5 don't have -- so I know if I have anything to 15:22:15  
6 report.

7 Q. Does the car have tinted windows?

8 A. I mean it has factory-tinted windows, so  
9 the -- the front is slightly tinted and the sides  
10 are tinted darker. 15:22:38

11 Q. And does it have any law enforcement  
12 lights?

13 A. It has -- it has law enforcement lights,  
14 but they are subdued. There is a few that maybe are  
15 visible on the front grille. 15:23:02

16 Q. And does it have a siren?

17 A. It does.

18 Q. Did you approach the intersection of 25th  
19 and Harvard in Broadview going southbound on 25th  
20 Street at about 7:45 that morning? 15:23:32

21 A. Yes, ma'am.

22 Q. And when you reached that intersection did  
23 you encounter a checkpoint at that intersection?

24 A. I did.

2025 10 16 25GJ994 [REDACTED]

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1 Q. What did you do at that checkpoint?

2 A. So, I pulled out my credentials, and then I  
3 rolled down my window, and I showed the officer that  
4 was standing in the middle of 25th that -- my  
5 credentials and said I was with ICE and then I was 15:24:16  
6 headed into Broadview.

7 Q. And what did he do?

8 A. He -- he stepped out of the way and kind of  
9 motioned for me to go ahead.

10 At that point I saw another officer 15:24:34  
11 standing in the intersection or in the center of  
12 what would be Harvard Street.

13 Q. And after you passed through the checkpoint  
14 did you go westbound on Harvard then?

15 A. I took a right turn, yes. 15:25:01

16 Q. Okay. Once you took the right turn, could  
17 you see the Broadway (sic) facility?

18 A. Off -- off if in the distance. I know it's  
19 there but I wouldn't say that I see it.

20 Q. Okay. About how far away was it at that 15:25:21  
21 point?

22 A. It's about 200 yards.

23 Q. And at that point -- well, let's go piece  
24 by piece.

2025 10 16 25GJ994 [REDACTED]

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1           Tell us what happened next. And I might  
2 interrupt you to ask you some questions, but tell us  
3 what happened after you started to proceed down  
4 Harvard Street.

5           A. Well, while I was turning onto Harper, I           15:26:05  
6 was still in -- in 25th Street. Like I said, there  
7 was another officer at -- right at the entrance of  
8 Harvard.

9           He, you know, slowly stepped out of the way  
10 as if to motion for me to go in. But, of course,           15:26:32  
11 there was a -- a crowd of angry protesters, you  
12 know, there in the vicinity and blocking the street.

13           Q. And then what happened next?

14           A. Well, I slowly proceeded, you know, into  
15 Harvard and I -- I expected, you know, the crowd to           15:27:10  
16 move out of the way. Especially with the presence  
17 of, you know Broadview Police Department there. But  
18 unfortunately, you know, they -- they didn't.  
19 Several of them stepped in front of my car. And  
20 pounding on the hood, you know, called me, you know,           15:27:43  
21 all kinds of names and -- and, you know, were  
22 ultimately preventing me from moving forward. So I  
23 started --

24           Q. Let me back you up.

2025 10 16 25GJ994 [REDACTED]

Page 13

1 A. Okay.

2 Q. Could you feel them pushing against your  
3 car? What were you -- what did you feel?

4 A. Yeah. I could -- I could feel the car  
5 rocking back and forth slightly, maybe a little bit 15:28:22  
6 less right at the beginning, but definitely as they  
7 -- more and more people began to surround my car and  
8 bang on it.

9 I could hear the impacts of their fists. I  
10 could hear, you know, like deep tones of, you know, 15:28:48  
11 fists hitting the window, hitting the sides of  
12 the -- of the car. And then I could hear higher  
13 pitched tones that felt like, you know, something  
14 was in their hand or possibly a large ring or  
15 something, you know, banging on the windows of the 15:29:23  
16 car.

17 Q. And at some point did the crowd in front of  
18 your car grow?

19 A. Yes.

20 Q. Did it get bigger? 15:29:40

21 A. Oh, yes. Definitely.

22 Q. So more people moved to the front of your  
23 car and that point?

24 A. Yeah. Coming -- they -- they were -- they

2025 10 16 25GJ994 [REDACTED]

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1 were calling for more people to come and pile in  
2 front of the car to keep pushing on it to try and  
3 stop me.

4 Q. You could hear that?

5 A. Yes. 15:30:14

6 Q. Thanks. Did you hear them chanting?

7 A. Yes. I -- I heard them chanting.

8 Q. And I won't ask you specifically what you  
9 heard.

10 Were you concerned that the windows would 15:30:35  
11 break?

12 A. Yes. Definitely. I -- I was concerned  
13 and -- and surprised that they didn't as hard as  
14 they were being struck, and I was concerned that if,  
15 you know, one of the windows was breaking I was 15:31:02  
16 probably going to be in a real -- a real dangerous  
17 situation.

18 Q. And why did you think that? What did you  
19 think could happen?

20 A. Well, I mean I -- I thought I was going to 15:31:21  
21 get drug out of the vehicle and, you know, assaulted  
22 or beat down.

23 I mean, you know, just from my experience  
24 that I've seen that in the past, you know. In large

2025 10 16 25GJ994 [REDACTED]

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1 crowds when people stop, they've got taken out of  
2 their vehicle and assaulted.

3 Q. So is it fair to say that you were in fear  
4 for your safety during this incident?

5 A. Yes. Definitely. 15:32:10

6 Q. What were you looking at this whole time?  
7 What was your focus?

8 A. So, as soon as, you know, I saw that they  
9 weren't moving out of the way, that they were --  
10 they were trying to stop me, the first thing I 15:32:33  
11 thought was, well, I can't stop or I'm going to  
12 be -- you know, this is going to go from bad to  
13 worse.

14 So I -- I focused on the people that were  
15 right in front of the car. Just, you know, to try 15:32:54  
16 and see if any of them were stumbling or anything.  
17 And then I was focusing on -- I was glancing back  
18 and forth it at my speedometer, which is a digital  
19 speedometer, to, you know, to see how fast I was  
20 going. 15:33:18

21 Q. And how fast did you go during that time?

22 A. It was going back and forth between zero  
23 miles per hour and one mile per hour. And then, you  
24 know, as I progressed down the street, eventually I

2025 10 16 25GJ994 [REDACTED]

Page 16

1 was able to get up to two miles per hour.

2 Q. And why were you going so slowly?

3 A. Well, because I wanted to continue forward  
4 motion, but I was concerned that, you know if  
5 someone were to fall in front of my car, that I  
6 would be in danger of harming them.

7 Q. Did you use your flashing law enforcement  
8 lights?

9 A. I did not, although I -- I thought that I  
10 could.

10:11:18

11 Q. Let me stop you.

12 A. Okay.

13 MS. MECKLENBURG: I need the batteries on  
14 the recorder.

15 (Discussion held  
16 off the record.)

17 (Whereupon the testimony  
18 was abruptly stopped.)

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2025 10 16 25GJ994 [REDACTED]

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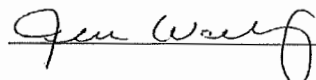
C E R T I F I C A T E

JEANINE WATKINS, being first duly sworn, on oath says that she is a Certified Shorthand Reporter doing business in the City of Elgin, County of Kane, and the State of Illinois;

That she reported in shorthand the foregoing audio recording of the proceedings of the Federal Grand Jury in the Grand Jury Room in the United States Courthouse in Chicago, Illinois;

That all speakers have been identified within the transcription based on the content of the said audio recording;

And that the foregoing is a true and correct transcript of her shorthand notes so taken as aforesaid and contains the full content of the said audio recording which was audible and discernible.



JEANINE WATKINS, C.S.R.

C.S.R. License No. 084-001629

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IN RE: GRAND JURY ) GRAND JURY  
INVESTIGATION ) NO. 25 GJ 994  
  
BEFORE THE FEDERAL GRAND JURY  
(SPECIAL JUNE 2024 - GRAND JURY)  
  
October 23rd, 2025 - Thursday  
2:29 P.M.

PRESENT:

THE HONORABLE ANDREW S. BOUTROS,  
United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604

BY: MS. SHERI MECKLENBURG (i)  
(Under Seal)

MR. MATTHEW SKIBA  
Assistant United States Attorneys.

1 (The Grand Jury, having  
2 reconvened at 2:29 p.m.  
3 on the 23rd day of September  
4 2025, pursuant to adjournment,  
5 met in closed session and  
6 the following is an excerpt of  
7 the proceedings had herein.)

8 MS. MECKLENBURG: Good afternoon.  
9 Sheri Mecklenburg and Matthew Skiba.

10 We are back on 25 GJ 994.

11 THE COURT REPORTER: Is it possible  
12 for you to speak in the microphone?

13 MS. MECKLENBURG: Can I use your --

14 MADAM FOREPERSON: You sure can.

15 MS. MECKLENBURG: Okay. And I will  
16 sit down in a minute, but I have some things  
17 that I want to say first.

18 25 GJ 994, we are back on that.

19 A couple of things: I want to remind you that  
20 we're at the accusatory stage. People will have  
21 defense- -- may have defenses to charges, in  
22 which case it all comes out at the -- in the  
23 district court, not in the Grand Jury.

24 I'm not going to ask you today  
25 if you can keep an open mind and deliberate

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1 fairly and apply the law to these facts.  
2 Instead, I'd like you all to stay and hear our  
3 evidence and our -- our law and our testimony.  
4 I'm bringing back Professor Skiba, who last time  
5 did a great job. But we're going to start over,  
6 because some people weren't here, and I think it  
7 was valuable to learn the law.

8 So I'm not going to ask you  
9 whether you can or can't. What I am going to  
10 ask is that you're all here. You all stay. You  
11 all listen, and then when your -- it is your  
12 time to deliberate, that you be honest with your  
13 fellow Grand Jurors. If you still feel like you  
14 are operating from feelings that prevent you  
15 from deliberating fairly with your fellow  
16 Grand Jurors and from applying the facts -- the  
17 law to the facts here, then tell your fellow  
18 Grand Jurors that you can't deliberate.

19 So I'm going to leave that to  
20 you. Before we start, I have to do a *mia culpa*,

21 because I'm the one who knows the rules, and I  
22 did something today that I'm not supposed to do.  
23 I had conversations with two Grand Jurors  
24 outside of the Grand Jury room. So I need to  
25 put it on the record.

4

1 And for those Grand Jurors, I'm  
2 not naming you. You can either confirm, deny,  
3 or speak up. I don't care. But I'm just going  
4 to tell you, you didn't do anything wrong. I'm  
5 the one who knows the rules. But it's very hard  
6 when someone talks to you, who you know, to not  
7 talk back to them.

8 So the first one was one of the  
9 Grand Jurors and I ran into each other in the  
10 elevator. This Grand Juror -- I am going to  
11 summarize to the best that I can. The  
12 Grand Juror apologized to me from last week, and  
13 I told the Grand Juror that I accepted his  
14 apology. I wasn't mad. I understand people  
15 have feelings. The Grand Juror said at that  
16 time that he did have feelings, and he's sure  
17 that he's right, but he shouldn't have walked

18 out the way he did. So that was one  
19 conversation.

20 And then I had another very  
21 brief conversation. I was up here and  
22 somebody -- one of the Grand Jurors said to me  
23 something about last week. And he said, "I'm  
24 sorry. I under- -- I can apply the facts to the  
25 law. I understand that people have feelings,

5

1 but we have to apply the facts to the law."

2 And I said, "That's true.  
3 That's exactly what we're asking you to do,"  
4 something like that, to the best of my  
5 recollection.

6 So I am -- it's on the record.  
7 I won't do that again. If I see you and I  
8 don't -- and I just say, "Hello, how's the  
9 weather," you will understand it's nothing  
10 personal.

11 And other than that, I'm going  
12 to -- we're going to do two things today. We're  
13 going to start over with the law with Professor  
14 Skiba and then we're going to call in [REDACTED]

15 [REDACTED] and we're going to start over with his  
16 testimony so that you can all hear him, see him,  
17 assess him. Thank you.

18 MR. SKIBA: All right. Good  
19 afternoon, everybody. For -- for some of you,  
20 this is going to be a review from last week.  
21 For others, this may be a little new. So part  
22 of what we wanted to do after the first session  
23 is to spend a little bit more time with the law.

24 These are complex statutes  
25 written by Congress. So one of the things that

6

1 we wanted to do -- to do is to break down the --  
2 the two statutes that we are presenting to you  
3 today to talk about what are our -- what are  
4 elements and what are irrelevant considerations.  
5 We also -- based on some of the questioning in  
6 the first ses- -- session, we actually wrote  
7 down some answers to your questions from the  
8 first session, which, again, gets to what is and  
9 what is not at issue with the elements that we  
10 are talking about.

11 So I am first going to present

12 the felony charge, and that is 18 United States  
13 Code, Section 372. And this statute is called  
14 "conspiracy to impede or injure an officer."  
15 And so we have the entire statutory text here.  
16 It is pretty lengthy, but I wanted to go through  
17 the elements that I have written down here to --  
18 to kind of break it down piece by piece.

19 So the first element is that --  
20 that two or more people need to conspire. And  
21 then to establish probable cause we need to  
22 establish one of the following: The first is to  
23 prevent by force, intimidation, or threat the  
24 officer from discharging his duties. I am going  
25 to talk in a little bit about what force,

7

1 intimidation, or threat means.

2 The second alternative is to  
3 injure an officer of the United States or his  
4 property on account of his lawful discharge of  
5 the duties of his office or while engaged in the  
6 lawful discharge of his duties.

7 So I know in the first session  
8 there was some question of "Well, Agent A was on

9 his way to work. Does that matter under these  
10 statutes?" So for the 3- -- this 372 charge,  
11 the answer is clearly no, because under the  
12 second alternative requirement, the injury to  
13 the officer or his property must either be on  
14 account of or because of the lawful discharge of  
15 his duties or while engaged in the lawful  
16 discharge of his duties.

17 So for this -- this alternative  
18 here, it's irrelevant whether he was actively  
19 working at the time or was -- he was on his way  
20 to work. And we'll talk a little bit more about  
21 what the Section 111 question, whether it's  
22 relevant that he was on his way to work in a  
23 little bit. And the last alternative here is --  
24 and again, this is an "or" -- to injure the  
25 property of an officer of the United States, so

8

1 as to molest, interrupt, hinder, or impede him  
2 in the discharge of his official duties.

3 So as I mentioned, I'm going to  
4 break down some of these requirements in further  
5 depth, but does anybody have any questions about

6 these elements under Section 372?

7 (No response.)

8 MR. SKIBA: Okay.

9 Oh, yes, ma'am.

10 GRAND JUROR: Can you talk a little  
11 bit about what it means to conspire?

12 MR. SKIBA: Absolutely. You read my  
13 mind.

14 Under this -- the next sheet  
15 that I have for you is "What is a conspiracy?"  
16 And so it -- and this is coming from the Seventh  
17 Circuit's instructions.

18 A conspiracy is an express --

19 MS. MECKLENBURG: And just so you  
20 know, we are in the Seventh Circuit.

21 MR. SKIBA: Yep.

22 MS. MECKLENBURG: That's who g- --  
23 governs our law.

24 MR. SKIBA: So a conspiracy -- and  
25 this is a direct quote. "A conspiracy is an

9

1 express or implied agreement between two or more  
2 persons to commit a crime."



1 potential defendants do know each other, but  
2 that's not the issue, that they met ahead of  
3 time and were all introduced and knew each other  
4 and went out and said, "Let's do this."

5 MR. SKIBA: Does anybody have any  
6 other questions about the elements?

7 (No response.)

8 MR. SKIBA: Okay. Seeing --

9 MS. MECKLENBURG: Did that help?

10 GRAND JUROR: Yes.

11 MS. MECKLENBURG: Okay.

12 MR. SKIBA: Seeing none.

13 And so we went over this last  
14 week. But this -- I think this quote from this  
15 case in New Jersey, I think, really hits -- it  
16 makes a very straightforward point. And this is  
17 a -- a direct quote from the case. "Section 372  
18 is straightforward. It prohibits individuals  
19 from conspiring to keep government employees  
20 from doing their job."

21 And that's precisely what  
22 happened here. As you-all will hear in a little  
23 bit from Agent A, Agent A is a government  
24 employee. And based on the video footage that  
25 we've reviewed a couple of times, it's clear

1 that the -- the co-conspirators here  
2 prohibited -- excuse me. They -- it -- the --  
3 these individuals conspired to keep Agent A from  
4 doing his job.

5 And so un- -- under this case  
6 from -- excuse me -- the District of Nevada --  
7 again, it's a straightforward statute --  
8 prohibits individuals from conspiring to keep  
9 government employees from doing their jobs.

10 Another question on the -- the  
11 elements is, what is force, intimidation, or  
12 threat? Well, you only need to prove one, but  
13 we think all three are satisfied here. Now,  
14 I -- I pulled a couple of quotes from a case out  
15 of the Western District of Texas. This is a  
16 civil statute, but it is a civil statute that is  
17 mirrored exactly in relevant part like the 372  
18 statute that we're presenting here.

19 And so a really great quote  
20 from this case is -- and, again, quote -- "the  
21 most commonly understood dictionary definition  
22 of 'intimidate' is to place a person in fear."  
23 And as you-all will hear in a little bit, Agent  
24 A was placed in fear by the actions of the

25 co-conspirators here based on the actions of

12

1 surrounding his car and preventing him from  
2 going forward.

3 Another quote from this case  
4 that I think is pretty telling here is  
5 surrounding a bus with about 100 cars in the  
6 interstate and attempting to block and control  
7 its movements by physically blocking it with  
8 their vehicles and driving dangerously could  
9 reasonably constitute force.

10 Now, I want to stop here and  
11 tell you that that is not what happened here.  
12 We are not saying that 100 cars surrounded  
13 Agent A. But the point is -- and the reason why  
14 we have this quote up -- is that the  
15 co-conspirators here, both the individuals named  
16 in the indictment and the other individuals in  
17 the video, surrounded and physically blocked  
18 Agent A's vehicle and tried to prevent it from  
19 going forward and going -- to prevent it from  
20 going into the Broadview facility.

21 Does anybody have any questions

22 about this sheet of paper?

23 (No response.)

24 MR. SKIBA: Okay. Seeing none.

25 And here is just a summary

13

1 of -- again, the question is, is there probable  
2 cause that the facts meet the law here? And  
3 we'll walk through this, but I think the answer  
4 we posit is yes.

5 So here there was a conspiracy  
6 implied by the conduct. The individuals you saw  
7 in the video surrounded the car of Agent A.  
8 They were banging on his car and windows. Some  
9 were scratching his car. Several of them moved  
10 to the front of their -- Agent A's car together  
11 to try to block it.

12 And each person we included in  
13 the indictment engaged in conduct that they used  
14 force and intimidation and threats that directly  
15 hindered or impeded Agent A and prevented him  
16 from moving his government-issued vehicle  
17 towards the Broadview facility.

18 So Michael Rabbit -- you saw

19 from the video -- hung onto the passenger's  
20 side. He pushed and banged on the side of the  
21 vehicle. Again, I'm not a car expert, but I  
22 believe -- I believe you heard the testifying  
23 agent a couple weeks ago. The thing that he was  
24 hanging on was the A-frame of the vehicle. Kat  
25 Abughazaleh placed herself in the front of the

14

1 vehicle. She pushed on the front of the vehicle  
2 with her hands and her body to prevent it from  
3 continuing.

4                   Cat Sharp was more or less  
5 right next to her. Also placed herself on the  
6 front of the vehicle, also pushed on the front  
7 of the vehicle with her hands on the body to  
8 prevent the -- the car from going forward.

9                   Brian Straw, he moved through  
10 the crowd to the front of the vehicle, and he  
11 pushed up against the vehicle with his hands and  
12 leveraged his body, like the others, to prevent  
13 the car from continuing forward.

14                   MS. MECKLENBURG: And just to remind  
15 you, Brian Straw is the one who had the orange

16 hat, and you saw him making his way to the car.

17 You have a question.

18 GRAND JUROR: Yeah, just a quick  
19 question.

20 MS. MECKLENBURG: Yeah.

21 GRAND JUROR: Are you going to show  
22 the video again? Because --

23 MS. MECKLENBURG: Yeah. We will do  
24 that, yeah.

25 GRAND JUROR: Okay. Because the

15

1 notes I have written down don't 100 percent  
2 match up with that. That's why I just wanted --

3 MS. MECKLENBURG: Okay. Yeah. No.  
4 We will show it to you.

5 GRAND JUROR: -- an opportunity to  
6 view it again --

7 MS. MECKLENBURG: Absolutely.

8 MR. SKIBA: Certainly.

9 GRAND JUROR: -- to make sure I  
10 didn't make a mistake.

11 MR. SKIBA: And then -- so Andre  
12 Martin was close to -- close in proximity to Kat

13 Abughazaleh and Cat Sharp. He had placed  
14 himself in the front of the vehicle. He pushed  
15 on it with his hands and -- hands and his body  
16 to prevent the vehicle from continuing.

17                   And, finally, Joselyn Walsh --  
18 excuse me -- Joselyn Walsh wrapped her arm  
19 around the driver's side mirror to prevent the  
20 vehicle from continuing. This was the -- the  
21 individual who had the guitar in the video.

22                   And then each person -- again  
23 named here -- they were pushing on the vehicle  
24 to hin- -- hinder and impede it, not to protect  
25 themselves from being hit. And as you will

16

1 recall from the video, there were chants  
2 surrounding Agent A's duties.

3                   Some were yelling, "Get a real  
4 job." I believe some were yelling, "Fuck this  
5 pig." Pardon my language. So it's clear that  
6 they -- they knew that he was related to ICE,  
7 and they had surrounded his vehicle because of  
8 his -- his role related to the Broadview  
9 facility.

10 Does anybody have any questions  
11 here before I turn to the other statute? And  
12 then at the end, there's some other  
13 miscellaneous Q & A for both of these statutes  
14 that we will go over in just a second.

15 MS. MECKLENBURG: And then we'll  
16 watch the video. Then, we'll have the  
17 testimony.

18 MR. SKIBA: Yeah.

19 (No response.)

20 MR. SKIBA: Okay. Seeing none.

21 About 372, I am going to turn  
22 to Section -- this is the misdemeanor count.  
23 This is 18 United States Code, Section 111. And  
24 this statute is called "assaulting, resisting,  
25 or impeding certain officers or employees."

17

1 This is a shorter statute. In relevant parts,  
2 I'll just read it to you.

3 This applies to whomever  
4 forcibly assaults, resists, opposes, impedes,  
5 intimidates, or interferes with any personnel  
6 designated in Section 111- -- excuse me --

7 1114 [sic] -- that's a law enforcement  
8 officer -- of this title while engaged in or on  
9 account of the performance of the official  
10 duties.

11 So breaking that -- this down  
12 further, first, you need to find that there was  
13 a forcible -- so the -- the term "forcible"  
14 applies to each of these verbs that follow. So  
15 forcibly assaults, resists, opposes, impedes,  
16 intimidates, or interferes. And there needs to  
17 be a federal officer.

18 And, finally, again, in  
19 relevant part, the actions were done while the  
20 officer was engaged in or was on account of the  
21 performance of his official duties. So the --  
22 again, the question under this statute -- one of  
23 the questions is, does it matter that he was on  
24 his way to work?

25 And the answer to -- under this

18

1 statute is no for two reasons. The first reason  
2 is just as a legal question, the statute  
3 requires that he be either engaged in his

4 official duties or that the incident be on  
5 account of his official duties.

6                   So, again, what that means is  
7 he doesn't actually need to be engaged in his  
8 official duties so long as the incident was on  
9 account of or because of his official duties.  
10 But the more fundamental point here is just as a  
11 factual matter. As you will hear from Agent A,  
12 Agent A was duty-bound to protect his vehicle.  
13 It was a government-issued vehicle. He is only  
14 able to use it for work-related purposes.

15                   So he can't go to the movies  
16 using his government-issued car. He can't go  
17 out to dinner with his wife in his  
18 government-issued car. No. He is only able to  
19 do government -- government-sanctioned  
20 activities while in that government-issued  
21 vehicle. And as you will also hear is -- he was  
22 duty-bound to ensure that nothing bad happened  
23 to that vehicle.

24                   Another question that was posed  
25 the last few times is, did Agent A need to be

1 assaulted? And the answer to that question is  
2 also no, because Section 111 also applies --  
3 applies to those who forcibly resist, oppose,  
4 impede, or intimidate an officer, again, while  
5 engaged in or on account of the performance of  
6 his official duties. And as the video shows,  
7 you know, these -- not only were these verbs  
8 met, but Agent A was both engaged in his  
9 official duties, and this incident was on  
10 account of the performance of his official  
11 duties.

12 And, finally, the last question  
13 under this statute that we have down -- and,  
14 again, we will have a few other questions and  
15 answers for you in just a minute -- what does  
16 the term "forcible" mean? And, again, this is  
17 also from the Seventh Circuit's pattern jury  
18 instructions. We are in the Seventh Circuit.

19 "Forcible" means by use of  
20 force. Physical force is sufficient, but actual  
21 physical contact is not required. So a person  
22 also acts forcibly if he threatens, attempts to  
23 inflict bodily harm upon another with a present  
24 ability to inflict bodily harm.

25 And, again, this is a -- a

1 quote from the comments. "Direct contact is not  
2 required so long as the conduct places the  
3 officer in fear for his life or safety." And as  
4 you will hear in a little bit, Agent A was in  
5 fear for his life or -- excuse me -- his life or  
6 safety.

7 Does anybody have any questions  
8 about Section 111?

9 (No response.)

10 MR. SKIBA: Okay. Seeing none.

11 And, finally, just on the law  
12 piece, we will -- we'll conclude with some just  
13 -- these are just miscellaneous questions  
14 that -- that a few of you asked related to both  
15 statutes.

16 So the first question is, what  
17 is Agent A's duty? Shouldn't he have stopped  
18 his vehicle?

19 And so the answer to that is --  
20 there is several-fold answers to that. So  
21 neither statute we are presenting today requires  
22 that he have stopped his vehicle. So it's an  
23 irrelevant question. This is not a personal  
24 injury case where the question is who is more at  
25 fault.

1                               But the -- the more fundamental  
2 point is even if he had stopped his vehicle  
3 entirely, they still -- the co-conspirators  
4 still would have been hindering and impeding him  
5 from driving forward. He also did not -- and  
6 this is true for both statutes. He didn't have  
7 a duty to retreat once these individuals  
8 surrounded his car and were preventing him from  
9 going forward.

10                              You will also hear from -- from  
11 Agent A -- and he had mentioned this last week.  
12 I am sure he will mention it today. The thing  
13 that was going through his head is he was scared  
14 to be a sitting duck at that point. He was  
15 worried that if he had stopped his -- his car  
16 entirely, he was going to be pulled out of his  
17 vehicle. The glass would have been broken, and  
18 he would have been subject to more harm if he  
19 had just stopped entirely.

20                              And so that's why -- again, in  
21 the interest of not hitting anybody -- to try to  
22 inch forward as slowly as he could -- as slowly

23 but as surely as he could so that he can get to  
24 safety at the Broadview -- Broadview facility.

25 Another question is, what about

22

1 the other witnesses? There is a -- a truck  
2 driver. There was local police in the area.  
3 Why aren't we hearing from them?

4 The -- the answer to that is  
5 this is a probable cause determination. The  
6 video itself is as plain as day on whether  
7 the -- there is probable cause to establish that  
8 the evidence marries up to the law here. So we  
9 don't need to in the Grand Jury present every  
10 conceivable witness that may have been there  
11 that day.

12 Another question was, what  
13 about the other individuals surrounding the car?  
14 Again, that's also irrelevant to the task today,  
15 which is just to determine whether there is  
16 probable cause to charge the six individuals  
17 that we had named in the indictment.

18 And then, finally -- and then I  
19 will get to the video in just a moment -- can

20 the government charge the misdemeanors without  
21 the Grand Jury?

22 And the answer to that is we  
23 are seeking a felony and so we cannot charge the  
24 Section 111 misdemeanor -- if we are seeking a  
25 felony on the 372 charge, we can't bifurcate

23

1 that. So we ask that you return a true bill on  
2 each count, including the Section 111  
3 misdemeanor count.

4 And so you have to consider the  
5 evidence and whether there is probable cause,  
6 considering the elements for each charge.

7 Yes, sir.

8 GRAND JUROR: That -- I am confused a  
9 little bit by that. I was under the impression  
10 or my understanding that you don't need to seek  
11 an indictment for a misdemeanor.

12 And am I completely mistaken on  
13 that?

14 MS. MECKLENBURG: If you are only  
15 charging that misdemeanor. But you can't have  
16 two cases against people. You can't seek a

17 felony charge and then separately bring -- you  
18 can't bring misdemeanors and seek a felony  
19 charge. So you can't have two cases.

20 GRAND JUROR: Right. But then --

21 MS. MECKLENBURG: Given that the  
22 government has chosen to seek a felony, they  
23 also have to ask you for the misdemeanor. We  
24 also have to ask you for the misdemeanor, so --

25 GRAND JUROR: But in this case, the

24

1 felony is conspiracy.

2 And then the misdemeanor, isn't  
3 that a different charge?

4 MS. MECKLENBURG: Always. Yeah.  
5 They are different charges.

6 GRAND JUROR: Yeah.

7 MS. MECKLENBURG: But you can't bring  
8 them separately. You can't have two cases  
9 against somebody. That wouldn't be fair to  
10 them, to defend themselves in two courtrooms.

11 Am I not answering your  
12 question?

13 GRAND JUROR: Yeah. I guess I'm --

14 MS. MECKLENBURG: Okay.

15 GRAND JUROR: -- I'm still a little  
16 bit -- understanding if he -- for the moment, if  
17 you were to not charge a felony conspiracy  
18 charge, could you -- couldn't you still charge  
19 that with a misdemeanor charge?

20 MS. MECKLENBURG: Could we charge the  
21 conspiracy with the misdemeanor?

22 GRAND JUROR: No, not the --

23 MS. MECKLENBURG: Could we charge the  
24 111 misdemeanors --

25 GRAND JUROR: Yeah.

25

1 MS. MECKLENBURG: -- if we decided  
2 strategically that we were not going to bring  
3 any felony?

4 We have the authority under the  
5 law to bring misdemeanors without a Grand Jury,  
6 but that should not affect your decision as to  
7 whether we have proven probable cause for each  
8 of these.

9 GRAND JUROR: Yeah.

10 MS. MECKLENBURG: You still have to

11 consider each. We have chosen to present this  
12 to you with a felony, and so you still have to  
13 consider each of these. You can't say, "You can  
14 do it without."

15 GRAND JUROR: Okay.

16 MS. MECKLENBURG: Does that answer  
17 your question a little better? You still look  
18 like you are not so sure.

19 Matt, do you want to give it a  
20 shot? Maybe you --

21 MR. SKIBA: Yeah. I was going to  
22 say, so, again, the question for these charges  
23 is probable cause.

24 GRAND JUROR: Yeah.

25 MR. SKIBA: So the question of, you

26

1 know, which charges we -- you know, again to  
2 Sheri's point -- we are strategically  
3 considering bringing, that's sort of outside the  
4 purview or outside the scope of the question of  
5 probable cause.

6 Because we are presenting both  
7 a felony and a misdemeanor, we have to present

8 both to you today. So I think what you are  
9 asking about is if you were only bringing a  
10 misdemeanor, can't you just do that on your own?  
11 I think that the point is, that's not what we  
12 are doing. We are presenting both a felony and  
13 a misdemeanor. And we can't, like, pick and  
14 choose what we are going to do. We can't only  
15 present the felony to you and then try to charge  
16 it as a misdemeanor ourselves.

17 We are presenting both to you.

18 And, again, the question is --

19 GRAND JUROR: Yeah. I think I get  
20 that, that you -- the fact that you intend to do  
21 it all, but --

22 MS. MECKLENBURG: Whether we can do  
23 it on our -- we can do misdemeanors on our own  
24 should not affect your decision as to whether  
25 there is probable cause for each of these

27

1 counts.

2 Does that make any sense to  
3 you?

4 GRAND JUROR: Yeah, I think so.

5 Well, it's just the one conspiracy count. I  
6 mean, the misdemeanor --

7 MS. MECKLENBURG: We want you to also  
8 consider each of the misdemeanors with it.

9 GRAND JUROR: Right. Okay.

10 MS. MECKLENBURG: Yeah. We're  
11 presenting it all to you.

12 GRAND JUROR: Yeah. I get that, but  
13 the --

14 MS. MECKLENBURG: Yes.

15 GRAND JUROR: Okay.

16 MS. MECKLENBURG: Your consideration  
17 should not be in assessing a -- an indictment,  
18 "Well, they could bring this charge without us.  
19 So we don't need to consider probable cause on  
20 that." That shouldn't be one of your  
21 considerations.

22 GRAND JUROR: Yeah, I understand  
23 that.

24 MR. SKIBA: Just said differently, if  
25 you as a Grand Jury were to find probable cause

2 misdemeanor, it's not -- it's no answer to say  
3 like, "Well, we don't need to" -- we could just  
4 let them do the misdemeanor. If there is  
5 probable cause, there is probable cause no  
6 matter how the case is charged.

7 Any other questions about the  
8 law before we turn back to the video?

9 (No response.)

10 MR. SKIBA: Okay. Seeing none.

11 Just bear with me on the  
12 technology.

13 MS. MECKLENBURG: Matt, do you feel  
14 comfortable doing the video?

15 MR. SKIBA: Yeah, I do.

16 MS. MECKLENBURG: Okay. I'm just  
17 here to help you.

18 MR. SKIBA: No worries.

19 MS. MECKLENBURG: You're the boss.

20 MR. SKIBA: Unless you want to do it.

21 MS. MECKLENBURG: No, no. You do it.

22 MR. SKIBA: All right. So --

23 MS. MECKLENBURG: But stop it, if you  
24 can, for --

25 MR. SKIBA: Yeah.

1 MS. MECKLENBURG: -- each one of them  
2 so that they can get an idea.

3 MR. SKIBA: So just as a reminder --  
4 so there is two videos here. I am happy to play  
5 it. I am happy to pause, and I will -- I will  
6 try to point out each of these individuals. It  
7 may require that I rewind a little bit. So bear  
8 with me there.

9 So here is the first video.

10 MS. MECKLENBURG: Is this the  
11 driver's side?

12 MR. SKIBA: This is driver's side  
13 front, yep.

14 MS. MECKLENBURG: Okay.

15 MR. SKIBA: Okay. So there is going  
16 to be a few people right off the bat. So I am  
17 probably just going to pause it right off the  
18 bat, but they we'll -- I am just going to play  
19 the whole video in its entirety just to remind  
20 folks what happened here. Okay.

21 (Whereupon, a video was played  
22 on the screen for the Grand  
23 Jurors.)

24 MR. SKIBA: So we have three  
25 individuals already here. This woman in

1 front -- she is blonde in pigtails -- is Kat  
2 Abughazaleh. Standing right next to her right  
3 to her right is Andre Martin. And the  
4 red-headed woman who is just behind Kat  
5 Abughazaleh -- this is on her -- to her left is  
6 Catherine Sharp.

7 (Whereupon, a video was played  
8 on the screen for the Grand  
9 Jurors.)

10 MR. SKIBA: And right here who just  
11 got hit with what looks like Scooby Doo is  
12 Jocelyn Walsh. She is the woman who is wearing  
13 a leather jacket. She's got a guitar, and it  
14 looks like she's hanging off the -- the driver's  
15 side mirror here. And I'm going to -- just  
16 going to play this.

17 (Whereupon, a video was played  
18 on the screen for the Grand  
19 Jurors.)

20 MR. SKIBA: And just to pause one --  
21 one second here.

22 As you could hear in the video,  
23 what they're saying is "Down, down with

24 deportation." So it's clear that these  
25 individuals know that Agent A is affiliated with

31

1 ICE.

2 (Whereupon, a video was played  
3 on the screen for the Grand  
4 Jurors.)

5 MR. SKIBA: They are also saying --  
6 you could hear a -- "Quit your job."

7 (Whereupon, a video was played  
8 on the screen for the Grand  
9 Jurors.)

10 MR. SKIBA: Okay. Does anybody need  
11 to see this video? Do you want me to rewind?

12 MADAM FOREPERSON: Can you just play  
13 it one time without --

14 MR. SKIBA: Sure.

15 MS. MECKLENBURG: Without stopping?

16 MR. SKIBA: Yep.

17 MADAM FOREPERSON: Thank you.

18 GRAND JUROR: Yeah. Could you let it  
19 go --

20 MR. SKIBA: I'm sorry?

21 GRAND JUROR: Could you led it go all  
22 the way to the end?  
23 MR. SKIBA: Yeah, absolutely.  
24 GRAND JUROR: Thank you.  
25 MR. SKIBA: Okay.

32

1 (Whereupon, a video was played  
2 on the screen for the Grand  
3 Jurors.)  
4 MR. SKIBA: Okay.  
5 MS. MECKLENBURG: And one thing I  
6 hope you were able to notice was that they  
7 weren't trapped there where they couldn't get  
8 away. There was plenty of room to move off to  
9 the sides and get out of the way.  
10 MR. SKIBA: We will play the other  
11 video in a second, but does anybody have any  
12 initial questions before I play it?  
13 Do you have a --  
14 GRAND JUROR: No.  
15 MR. SKIBA: Oh, sorry.  
16 Okay. I am going to pull up  
17 the second video. Just bear with me one moment.

18 MS. MECKLENBURG: Let'S do it with  
19 stopping, and then we'll play it all the way  
20 through.

21 MR. SKIBA: Yeah. I will do that.

22 MS. MECKLENBURG: Thank you.

23 MR. SKIBA: Okay. In fact, right  
24 here let me just point out, again, you can see  
25 Kat Abughazaleh before I even play the video.

33

1 And this is Andre Martin, again, right next to  
2 her.

3 (Whereupon, a video was played  
4 on the screen for the Grand  
5 Jurors.)

6 MS. MECKLENBURG: And Cat Sharp  
7 also --

8 MR. SKIBA: Yeah.

9 MS. MECKLENBURG: -- right back  
10 there.

11 MR. SKIBA: The red-headed woman  
12 right behind Kat Abughazaleh.

13 (Whereupon, a video was played  
14 on the screen for the Grand

15 Jurors.)

16 MS. MECKLENBURG: There is -- yeah.

17 MR. SKIBA: Yeah.

18 And here -- I am going to make  
19 sure I get his first name correct. But I am  
20 just going to call him Mr. Rabbitt. He is the  
21 individual -- he has got these sunglasses on his  
22 head. They're -- it looks like they are blue  
23 tinted. He has got this -- it looks like a  
24 black sleeve, and he is hanging onto what the  
25 agent a few weeks ago called the A-frame.

34

1 (Whereupon, a video was played  
2 on the screen for the Grand  
3 Jurors.)

4 MS. MECKLENBURG: And he moved up to  
5 the car in this video. You can see that he  
6 moved through and up.

7 THE COURT REPORTER: Sorry? I didn't  
8 hear what you said. I'm sorry.

9 MS. MECKLENBURG: He moved up to the  
10 car.

11 (Whereupon, a video was played

12 on the screen for the Grand  
13 Jurors.)

14 MR. SKIBA: And here's another  
15 individual. This is -- and, again, I'm just  
16 going to call him by his last name, Mr. Straw.  
17 He is -- it looks like an orange hat, black  
18 sunglasses, and with a beard here. And there is  
19 going to be a better shot of him in a moment.

20 (Whereupon, a video was played  
21 on the screen for the Grand  
22 Jurors.)

23 MR. SKIBA: And, again, here is  
24 Mr. Rabbitt. He has got like a -- again, black  
25 sleeves but a gray shirt here and sunglasses.

35

1 (Whereupon, a video was played  
2 on the screen for the Grand  
3 Jurors.)

4 MR. SKIBA: Yes, sir.

5 GRAND JUROR: I'm just trying to sort  
6 of like -- I can see Straw in the red hat.

7 MS. MECKLENBURG: Keep your eyes on  
8 him for a few seconds --

9 GRAND JUROR: Yeah. But --

10 MS. MECKLENBURG: -- and then we'll  
11 stop it when he gets to the car.

12 GRAND JUROR: -- Michael Rabbitt no  
13 longer appears in the frame. And neither Kat --  
14 or either Kat appears to be anywhere near the  
15 front of the truck again. I'm just wondering  
16 about that. So I don't -- I'm struggling to  
17 locate them.

18 MS. MECKLENBURG: You -- they don't  
19 have -- they can step away. You can do it that  
20 -- you can impede for some time, and then you  
21 can decide that you're going to stop. That  
22 doesn't change the fact that you have impeded  
23 for some time. And they could be going -- and  
24 we don't know where they are here. They could  
25 be going and doing something else to the car or

36

1 something else. We just don't know.

2 GRAND JUROR: Okay.

3 MS. MECKLENBURG: So I -- what's --  
4 the probable cause comes from when you do see  
5 them on the video, not from when you don't.

6 GRAND JUROR: Uh-huh.

7 MS. MECKLENBURG: But keep your eye  
8 on Mr. Straw now with the orange cap and see  
9 what he does.

10 (Whereupon, a video was played  
11 on the screen for the Grand  
12 Jurors.)

13 MR. SKIBA: As you can see on  
14 Mr. Straw, there is a pretty wide berth that he  
15 has, that he could step through this way. He  
16 could step through this way. So he is not  
17 trapped, by any means.

18 MS. MECKLENBURG: And you can see he  
19 pushed his way up and to the car.

20 (Whereupon, a video was played  
21 on the screen for the Grand  
22 Jurors.)

23 MS. MECKLENBURG: Because he wasn't  
24 on the car.

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1 (Whereupon, a video was played  
2 on the screen for the Grand

3 Jurors.)

4 MS. MECKLENBURG: Just for the  
5 record --

6 MR. SKIBA: Yeah. Just for the  
7 record, they are saying, "Get to the front. Get  
8 to the front."

9 (Whereupon, a video was played  
10 on the screen for the Grand  
11 Jurors.)

12 MS. MECKLENBURG: And here again is  
13 Kat Abughazaleh right here walking back.

14 (Whereupon, a video was played  
15 on the screen for the Grand  
16 Jurors.)

17 MR. SKIBA: Okay. So I'm happy to  
18 start from the top and just -- I will just play  
19 this without interrupting.

20 But does anybody -- does  
21 anybody have any questions before I do that?

22 MADAM FOREPERSON: So this video is  
23 right after the first video you showed us?

24 So that -- which one took  
25 place -- the first one that you showed us took

1 place --

2 MS. MECKLENBURG: Same time.

3 MR. SKIBA: Yeah. So this is just a  
4 different angle.

5 MADAM FOREPERSON: Okay.

6 MR. SKIBA: Yeah.

7 MS. MECKLENBURG: The first side is  
8 the driver's side, and the second side is the  
9 passenger's side.

10 MADAM FOREPERSON: Passenger's side.

11 MS. MECKLENBURG: So it's happening  
12 at the same time. But keep in mind, people are  
13 moving in and out --

14 MADAM FOREPERSON: Yeah.

15 MS. MECKLENBURG: -- which is part of  
16 the conspiracy.

17 MADAM FOREPERSON: Right.

18 MR. SKIBA: Okay. Seeing no other  
19 questions --

20 I'm sorry, ma'am. Did you have  
21 a -- Okay.

22 I'm just going to rewind to the  
23 start. I won't interrupt it unless you-all want  
24 me to.

25

1                   (Whereupon, a video was played  
2                   on the screen for the Grand  
3                   Jurors.)

4                   MR. SKIBA: Okay. Does anybody have  
5 any questions about this video?

6                   MS. MECKLENBURG: Can we bring in  
7 Agent A? And those of you who were here last  
8 week know his real name, and those of you who  
9 weren't will hear his real name.

10                   (Whereupon, was had the  
11                   testimony of ██████████  
12                   which is included under  
13                   separate cover.)

14                   GRAND JUROR: I have a real quick  
15 question.

16                   MS. MECKLENBURG: Yes.

17                   GRAND JUROR: You showed two pictures  
18 of the side mirror?

19                   MS. MECKLENBURG: Yes.

20                   GRAND JUROR: From looking at those  
21 right here, are there any pictures other than  
22 from their direction?

23                   MS. MECKLENBURG: I don't -- I did  
24 not see any.

25

GRAND JUROR: Okay.

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1 MS. MECKLENBURG: Yeah. I didn't see  
2 any. But I think they took those pictures to  
3 show where it was actually broken.

4 GRAND JUROR: Yeah, I know.

5 MS. MECKLENBURG: Yeah.

6 GRAND JUROR: My concern is that --  
7 the paint balls that they -- the pepper balls  
8 that --

9 THE COURT REPORTER: Sorry. "My  
10 concern was that" -- I didn't hear you.

11 GRAND JUROR: The pepper --

12 GRAND JUROR: That's why I was just  
13 wondering if there was any in this particular  
14 side of --

15 THE COURT REPORTER: Sorry. It's --  
16 sorry. I can't hear you.

17 MS. MECKLENBURG: I think that --

18 GRAND JUROR: I'm sorry. I was -- I  
19 was asking if there are any images -- any  
20 pictures of the side mirror from the other side,  
21 not just the side that shows the -- the window

22 gone, but the other that shows whether it could  
23 possibly have impacted --

24 THE COURT REPORTER: I'm sorry. I  
25 still can't hear you. I'm sorry.

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1 GRAND JUROR: I was simply asking if  
2 there are any pictures of the side mirror from  
3 the other viewpoint, not just showing the same  
4 window but -- or the missing mirror but if there  
5 are any from the other side potentially showing  
6 if there is any impact on it. That was all.

7 MS. MECKLENBURG: Okay. So I am not  
8 going to do the IDs again, because most of you  
9 were here when we did the IDs and there didn't  
10 seem to be a lot of questions. And, frankly, if  
11 I do that, you might be here for a while longer.

12 So these were the six people  
13 who we identified: Michael Rabbitt, Katherine  
14 Marie Abughazaleh, Andre Martin, Catherine  
15 Sharp, Brian Straw, Joselyn Walsh. And the  
16 indictment says that Agent A was a law  
17 enforcement officer, which is required by the  
18 statute, and that on or about he was de- -- and

19 that on or about September 23rd, he was detailed  
20 to serve on assignment for ICE, that he was  
21 in -- that Broadview was an ICE facility, and  
22 that each of these six people are people in --  
23 who were residing or found in the Northern  
24 District of Illinois.

25 And I have that Andre Martin

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1 was an individual found in the Northern District  
2 of Illinois because that's where he was that  
3 day. On or about September 26th at  
4 approximately 7:45 a.m., Agent A was wearing  
5 civilian clothes. He was in a government-owned  
6 vehicle, and he was reporting for official  
7 duties -- in his official duties. And then he  
8 told you that these were -- this included his  
9 official duties. I will leave you a copy of  
10 this if you want to look at that. I won't read  
11 it to you.

12 And that on that date,  
13 September 26th, they conspired with one  
14 another -- and that's under the meaning of  
15 "conspiracy" as we explained it, because that's

16 the law -- to prevent by force, intimidation,  
17 and threat Agent A -- the United States law  
18 enforcement officer -- from discharging the  
19 duties of his office, and to injure him in his  
20 person or property on account of his lawful  
21 discharge of the duties of his office and while  
22 engaged in the lawful duties and to injure his  
23 property so as to interrupt, hinder, and impede  
24 him in the discharge of his official duties.

25 So that's the crux of this, is

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1 a conspiracy with the interruption, hindering,  
2 and impeding. It was part of the conspiracy  
3 that as he drove there, these six people were  
4 among the people -- a group of individuals,  
5 including these six people surrounded his car  
6 with the intent to hinder and impede the car --  
7 to hinder and impede Agent A from dis- -- from  
8 proceeding and discharging the duties of his  
9 office.

10 It was part of the conspiracy  
11 that while surrounding the car, these six people  
12 with others, among other things, banged

13 aggressively on the car and the back windows,  
14 the hood, and other vehicle body parts, crowded  
15 together in front of -- in the front and side of  
16 the government vehicle and pushed against the  
17 vehicle to hinder and impede its movement,  
18 scratch the body of the vehicle, including  
19 etch -- etching a message into the body of the  
20 vehicle -- specifically the word "pig" -- broke  
21 one of the government vehicle's side mirrors,  
22 and broke a rear windshield wiper off the  
23 government vehicle.

24                                   And it was part of this  
25 conspiracy that each of these six people

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1 physically hindered and impeded Agent A in the  
2 government vehicle such that he was forced to  
3 drive at an extremely slow rate of speed to  
4 avoid injuring any of these people, and in doing  
5 so slowly progressed toward the building so that  
6 he could discharge his duties.

7                                   Then for each of these people  
8 we say what -- something that they did. So we  
9 picked out -- and I told you this both of the

10 last two times. We didn't pick out people who  
11 were just walking alongside. We identified  
12 people who were actually doing something.  
13 Mr. Rabbitt was the one with the orange hat. He  
14 was one of the people surrounding the vehicle,  
15 bracing his --

16 GRAND JUROR: That's not right.

17 MS. MECKLENBURG: Oh. Mr. -- I keep  
18 getting those two mixed up. Mr. Rabbitt was the  
19 one on the side of the vehicle.

20 GRAND JUROR: That's right.

21 MS. MECKLENBURG: And he was the one  
22 with the gray shirt and the black sleeves.

23 So I apologize again.

24 He was -- surrounded the  
25 vehicle from the side, bracing his hands and

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1 body against the vehicle, and hitting the  
2 windows.

3 Then came Ms. Abughazaleh. She  
4 joined the crowd at the front of the car with  
5 her hands on the hood, bracing her body and  
6 hands against the vehicle, while remaining

7 directly in the path of the vehicle.

8 Mr. Martin did the same thing.

9 He pressed -- also pressed his shoulder against  
10 the vehicle while remaining in the path of the  
11 vehicle.

12 Ms. Sharp joined the crowd at  
13 the front with her hands on the hood and braced  
14 her body and hands against the vehicle while  
15 remaining in the path of the vehicle.

16 And Mr. Straw joined the crowd  
17 at the front of the vehicle. He is the one in  
18 the orange hat and with his hands on the hood  
19 and braced his body and hands against the  
20 vehicle while remaining directly in the path of  
21 the vehicle.

22 And Mr. Walsh joined the --  
23 Ms. Walsh, she was the one with the guitar. She  
24 joined the crowd near the front driver's side  
25 window of the government vehicle and wrapped her

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1 arms around the driver's side mirror as she  
2 pushed against the vehicle. All of these were  
3 hinder- -- movements were hindering and impeding

4 Agent A and the vehicle from proceeding to the  
5 Broadview building, and all in violation of  
6 Title 18, United States Code, Section 372.

7                   Then we have count -- one count  
8 for each of the defendants under 111 -- Section  
9 111(a)(1) and (2). (2) just says that they  
10 either -- they also assisted -- or basically  
11 aided and assisted. So very often we'll include  
12 (2) in there along with that.

13                   So, for instance, on that date,  
14 Michael Rabbitt forcibly impeded, intimidated,  
15 and interfered with an officer of the United  
16 States, namely Agent A, while engaged in or on  
17 account of the performance of his official  
18 duties in violation of these sections. And for  
19 each person, that is the language that we used.  
20 They're all the same, just the different names:  
21 Andre Martin, Catherine Sharp, Brian Straw,  
22 Jocelyn Walsh.

23                   Do you have any questions for  
24 us?

25                   GRAND JUROR: So all of the -- the

1 second -- I mean, the counts, those are the  
2 misdemeanors?

3 MS. MECKLENBURG: Yes.

4 GRAND JUROR: And so the  
5 misdemeanors -- you are charging the same  
6 actions as a felony and -- and as a misdemeanor?

7 MS. MECKLENBURG: Yes. And you --

8 GRAND JUROR: Is that right?

9 MS. MECKLENBURG: Yes. And that is  
10 permissible charging. You can do that. You can  
11 charge the same actions under different  
12 statutes. Well, it's actually a little bit  
13 different, because one is a conspiracy.

14 GRAND JUROR: Okay.

15 MS. MECKLENBURG: And the  
16 misdemeanors are what they did individually,  
17 which is why they each have a separate count.  
18 So they're not the exact same thing.

19 For instance, if just Mr. Straw  
20 had been out there, we would -- could charge him  
21 with the 111, but we wouldn't charge him with  
22 the conspiracy.

23 GRAND JUROR: Okay. And then the  
24 list of -- I think of one to seven -- I'm not  
25 sure how many there were -- does there have to

1 be agreeance on all seven of those?

2 MS. MECKLENBURG: You mean the  
3 counts?

4 GRAND JUROR: Not the count.

5 MR. SKIBA: The individuals?

6 GRAND JUROR: No. The -- in the  
7 first count, there were several things that you  
8 described.

9 MS. MECKLENBURG: You have to -- you  
10 have to pick one of the things that they did,  
11 and you have to say it threatened, intimidated,  
12 hindered, or impeded.

13 GRAND JUROR: Okay.

14 THE COURT REPORTER: Sorry. I have  
15 to --

16 MS. MECKLENBURG: You can go ahead.  
17 Let's turn on the recorder at this point.

18 (Whereupon, a short break was  
19 taken and the testimony was  
20 recorded via audio recorder and  
21 transcribed.)

22 MS. MECKLENBURG: I think what you  
23 are asking -- is it in paragraph 5?

24 GRAND JUROR: Yes.

25 MS. MECKLENBURG: Whether each of

1 these people had to do each of these things.

2 Is that what you are asking?

3 GRAND JUROR: Or if we have to agree  
4 that each of those four or five, six, whatever  
5 are true.

6 MS. MECKLENBURG: Here is what it  
7 says, though, that they each and others among  
8 other things. So remember you learned the law,  
9 in a conspiracy, that you are responsible for  
10 other things that people do. So they don't --  
11 they don't have to actually scratch the car.  
12 You don't have to know that they're the ones who  
13 scratched the car.

14 The people who surrounded  
15 scratched the car, and they are part of that  
16 bigger conspiracy. That was the law that we  
17 were talking about.

18 GRAND JUROR: Okay.

19 MS. MECKLENBURG: I know. It's a --  
20 it's a hard one. I agree. I have been doing  
21 this for a long time, and even when I look at  
22 it, I have to think about it a lot. So I

23 appreciate your questions. I think they're  
24 insightful.  
25 GRAND JUROR: I kind of have a

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1 hypothetical -- hypothetical, but kind of not.  
2 MS. MECKLENBURG: Okay. We'll try.  
3 GRAND JUROR: So are -- is it  
4 basically arguing that pretty much anybody who  
5 walked in front of that car could be charged  
6 with a conspiracy even if they weren't actually  
7 touching the car and somehow impeding it, even  
8 if they were just walking along with it?

9 MS. MECKLENBURG: That is not what we  
10 charged. And I don't want to answer  
11 hypotheticals. We charged only people who were  
12 actually doing things.

13 GRAND JUROR: I --

14 MS. MECKLENBURG: So if you are going  
15 to talk about could we charge this person or  
16 that person, it's not relevant to the probable  
17 cause against these people.

18 GRAND JUROR: Right. Except that  
19 what I'm getting to is I watched that video

20 again. And specifically with regards to Cat

21 Sharp --

22 MS. MECKLENBURG: Mm-hmm.

23 GRAND JUROR: -- maybe I completely

24 missed it, but at no point did I ever see her

25 touching the car. Or she looked in that video

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1 to me to be more walking behind two people in

2 close proximity but not actually touching it.

3 And so I -- that's where I'm kind of -- that's

4 how I feel. If somebody is there walking in --

5 in front but not actually engaging the car, are

6 they somehow still part of this conspiracy?

7 Because --

8 MS. MECKLENBURG: Well, okay. I'm

9 not going to -- I'm going to let you figure out

10 your facts as to what you saw on the video, and

11 in deliberation you can talk about that.

12 Whether you saw her reaching forward as well or

13 pushing on other people to hold off the car, you

14 decide what you saw. I -- I showed you the

15 video, gave you the testimony, and you draw your

16 conclusions.

17 I will tell you that if  
18 somebody is also in front of the vehicle in the  
19 crowd preventing the car from -- standing in  
20 front of the car from it going, then they can be  
21 part of the conspiracy.

22 GRAND JUROR: There is a question  
23 over here.

24 MS. MECKLENBURG: Yes.

25 GRAND JUROR: Can you leave the

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1 videos for us to look at if we -- while we  
2 deliberate or not?

3 MS. MECKLENBURG: Yeah. There is a  
4 password on the --

5 GRAND JUROR: Or can you at least  
6 play the first one again?

7 GRAND JUROR: Yeah.

8 MS. MECKLENBURG: Sure.

9 GRAND JUROR: Or at least the first  
10 one, unless you want to see the second one.

11 MS. MECKLENBURG: Yeah, yeah. No --

12 GRAND JUROR: You don't even have to  
13 play it all the way to the end. Just --

14 MS. MECKLENBURG: Sure, sure. Let's  
15 do that.  
16 GRAND JUROR: Yeah. The first one is  
17 the one I think --  
18 GRAND JUROR: Huh?  
19 GRAND JUROR: I know my question --  
20 the first one.  
21 GRAND JUROR: The first one, yeah.  
22 GRAND JUROR: I mean, the second one,  
23 I don't even see her.  
24 GRAND JUROR: Yeah.  
25 MS. MECKLENBURG: You can see from

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1 across the car, but -- and we can play the first  
2 one.  
3 MR. SKIBA: Oh, wait. That's just --  
4 that's why I couldn't find it. There we go.  
5 Just one moment.  
6 (Whereupon, a video was played  
7 on the screen.)  
8 GRAND JUROR: Yeah, yeah.  
9 MS. MECKLENBURG: It's a fast one, I  
10 know.

11 GRAND JUROR: Yeah.  
12 GRAND JUROR: You can see her hand.  
13 GRAND JUROR: Yeah.  
14 GRAND JUROR: You can see her hand.  
15 GRAND JUROR: And then she pulls it  
16 away, yeah.  
17 GRAND JUROR: The redhead?  
18 GRAND JUROR: Yeah.  
19 (Whereupon, a video was played  
20 on the screen.)  
21 GRAND JUROR: Okay. Play it again.  
22 GRAND JUROR: I am not seeing what  
23 you guys are seeing.  
24 GRAND JUROR: Play it again.  
25 MS. MECKLENBURG: Hold on.

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1 (Whereupon, a video was played  
2 on the screen.)  
3 GRAND JUROR: Her hand is right  
4 there.  
5 GRAND JUROR: That?  
6 GRAND JUROR: This is it, and then  
7 you will see her go in and then a little bit

8 out, but she is right in front of this guy's  
9 arm. So this is her. Yeah. She is, like,  
10 under his arm.

11 GRAND JUROR: Yeah.

12 MS. MECKLENBURG: She is reaching.

13 GRAND JUROR: Yeah. Watch. Just  
14 watch.

15 GRAND JUROR: Can you go slower? Can  
16 you slow it down?

17 MR. SKIBA: I don't believe I am able  
18 to go slow with this. Let me see if there is a  
19 mechanism for that. I don't think there is,  
20 unfortunately.

21 GRAND JUROR: It's okay.

22 GRAND JUROR: Yeah. She is, like,  
23 behind him, but her arm is under his.

24 GRAND JUROR: Yeah. I guess this is  
25 why I don't hunt.

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1 GRAND JUROR: I am going to --

2 GRAND JUROR: Yeah. Sorry if I'm --

3 MR. SKIBA: No, you are fine.

4 GRAND JUROR: -- in your space.

5 MR. SKIBA: You are good.

6 GRAND JUROR: No. You -- you're  
7 fine.

8 GRAND JUROR: Could you hit "play"?

9 MR. SKIBA: Yeah. From the -- from  
10 the start or from here?

11 GRAND JUROR: Right here.

12 GRAND JUROR: Back up just a hair.

13 MR. SKIBA: Okay.

14 (Whereupon, a video was played  
15 on the screen.)

16 MS. MECKLENBURG: So here is what I  
17 am going to --

18 GRAND JUROR: I did not see that  
19 before. That is --

20 MS. MECKLENBURG: I'm glad you asked  
21 that. I really am. I'm going to just ask  
22 you -- remind you to --

23 GRAND JUROR: Do you need to see  
24 anything else on there?

25 MS. MECKLENBURG: Oh, I'm sorry.

1 GRAND JUROR: No.

2 GRAND JUROR: Did you want to see the  
3 second one, [REDACTED]?

4 GRAND JUROR: No. That's okay.

5 MR. SKIBA: We can play it more if  
6 you want.

7 MS. MECKLENBURG: Do you want more?

8 GRAND JUROR: No.

9 MS. MECKLENBURG: Okay.

10 GRAND JUROR: For me it was the --

11 MS. MECKLENBURG: It's getting late,  
12 I know.

13 I ask that you deliberate with  
14 each other in good faith. If anybody still  
15 feels that you can't, then you have to be honest  
16 with your fellow Grand Jurors and tell them that  
17 your feelings about this are too strong, that  
18 they will not allow you to apply the fact -- the  
19 law to these facts.

20 That's your duty. That's the  
21 oath you took. So if that's how you feel, then  
22 you have to tell your fellow Grand Jurors that  
23 you can't deliberate with them. I'm not going  
24 to ask you if you can or can't.

25 We will be outside if you have

1 questions like that, the -- like the good  
2 question we were just asked. Come out and ask  
3 us so that we can help you get to yes or no.  
4 Don't just decide without -- if you have  
5 questions that prevent you from finding what  
6 happened.

7 Thank you, everyone, for your  
8 attention and for being here today. We really  
9 appreciate it.

10 GRAND JUROR: Thank you.

11 (Whereupon, there being no  
12 questions by the Grand Jurors,  
13 the Grand Jurors were left to  
14 deliberate.)

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C E R T I F I C A T E

Kari Wiedenhaupt, being first duly sworn, on oath says that she is a Certified Shorthand Reporter doing business in the City of Chicago, County of Cook, and the State of Illinois;

That she reported in shorthand the foregoing audio recording of the proceedings of the Federal Grand Jury in the Grand Jury Room in the United States Courthouse in Chicago, Illinois;

That all speakers have been identified within the transcription based on the content of the said audio recording;

And that the foregoing is a true and correct transcript of her shorthand notes so taken as aforesaid and contains the full content of the said audio recording which was audible and discernible.

---

Kari Wiedenhaupt, CSR.

24

C.S.R. NO. 084-004725

25

2025 10 23 25 GJ 994 [REDACTED]

Page 1

IN RE: GRAND JURY ) GRAND JURY  
INVESTIGATION ) NO. 25 GJ 994

BEFORE THE FEDERAL GRAND JURY  
(SPECIAL JUNE 2024 - GRAND JURY)

October 23rd, 2025 - Thursday  
3:15 P.M.

PRESENT:

THE HONORABLE ANDREW S. BOUTROS,  
United States Attorney  
219 South Dearborn Street  
Chicago, Illinois 60604

BY: MS. SHERI MECKLENBURG (i)  
(Under Seal)

MR. MATTHEW SKIBA  
Assistant United States Attorneys.

2025 10 23 25 GJ 994 [REDACTED]

1 I N D E X

2 WITNESS: [REDACTED] PAGES

3 Direct Examination by Ms. Mecklenburg.....4 - 35

4 Examination by the Grand Jurors.....35 - 41

5 E X H I B I T S

Presented for  
6 Identification

7

8 Grand Jury Exhibit 1, Photo 13..... 25

9 Grand Jury Exhibit 1, Photo 15..... 25

10 Grand Jury Exhibit 1, Photo 16..... 26

11 Grand Jury Exhibit 1, Photo 17..... 28

12 Grand Jury Exhibit 1, Photo 18..... 28

13 Grand Jury Exhibit 1, Photo 36..... 29

14 Grand Jury Exhibit 1, Photo 41..... 30

15 Grand Jury Exhibit 1, Photo 42..... 30

16 Grand Jury Exhibit 1, Photo 48..... 31

17 Grand Jury Exhibit 1, Photo 49..... 32

18 Grand Jury Exhibit 1, Photo 38..... 32

19 Grand Jury Exhibit 1, Photo 39..... 33

20 Grand Jury Exhibit 1, Photo 44..... 34

21 (\*\*Marked exhibits retained by the attorney.)

22  
23  
24  
25

2025 10 23 25 GJ 994 [REDACTED]

Page 3

1 (The Grand Jury, having  
2 reconvened at 3:16 p.m.  
3 on the 23rd day of September  
4 2025, pursuant to adjournment,  
5 met in closed session and  
6 the following proceedings  
7 were had herein.)

8 MADAM FOREPERSON: Good afternoon.  
9 Please raise your right hand.  
10 (Witness complied.)

11 MADAM FOREPERSON: State and spell  
12 your name for the record.

13 THE WITNESS: [REDACTED];  
14 [REDACTED].

15 MADAM FOREPERSON: Do you solemnly  
16 swear or affirm that in the testimony you're  
17 about to give before this Grand Jury to tell the  
18 truth, the whole truth, and nothing but the  
19 truth, so help you God?

20 THE WITNESS: I do.

21 MADAM FOREPERSON: Thank you.  
22  
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24  
25

2025 10 23 25 GJ 994 [REDACTED]

Page 4

1 WHEREUPON:

2 [REDACTED]

3 called as a witness herein, having been first  
4 duly sworn, deposeth and saith as follows:

5 DIRECT EXAMINATION

6 by Ms. Mecklenburg

7 Q. Good afternoon, Mr. [REDACTED].

8 Can you hear me?

9 A. Yes.

10 Q. Okay. And we're going to ask  
11 you some -- I'm going to start with some of the  
12 same questions you've answered, but there's new  
13 people -- not new people, but there's different  
14 people today in the Grand Jury. So we are going  
15 to tell -- we are going to start from the very  
16 beginning again.

17 A. Okay.

18 Q. Can you tell us, what is your current  
19 job?

20 A. I'm the [REDACTED]  
21 for Immigration and Customs Enforcement in

22 [REDACTED].

23 Q. And is that -- Immigration and Customs  
24 Enforcement what a lot of people know as ICE?

25 A. Yes, ma'am.

2025 10 23 25 GJ 994 [REDACTED]

Page 5

1 Q. And how long have you been with ICE?

2 A. Twenty-four years.

3 Q. How long have you been the [REDACTED]  
4 [REDACTED]?

5 A. Since June of this year in [REDACTED]  
6 and since 2017.

7 Q. Somewhere else?

8 A. Yes.

9 Q. Okay. And when you say in [REDACTED] --  
10 and we'll ask you about your duties in a minute.  
11 Why do you say [REDACTED]?

12 Is that where you are actually  
13 based and where you perform your duties usually?

14 A. Yes, ma'am. That's my -- that's my  
15 permanent duty station.

16 Q. What -- what were you doing -- were you  
17 at some point reassigned to Chicago?

18 A. Yes, ma'am. I am assigned here on  
19 temporary duty.

20 Q. Can you describe in general your duties  
21 as [REDACTED]?

22 A. I --

23 Q. And do they differ -- I should ask you,  
24 do they differ from -- your duties in [REDACTED]  
25 versus what you were supposed to do in Chicago?

2025 10 23 25 GJ 994 [REDACTED]

Page 6

1 A. No, ma'am.

2 Q. Okay. Then go ahead. Go ahead and  
3 describe them, please.

4 A. So as the [REDACTED]  
5 [REDACTED], I am the second line manager for the  
6 office in [REDACTED] and then I also oversee an  
7 office in [REDACTED]

8 So I oversee all of the  
9 operations of my supervisors that report  
10 directly to me and then their subordinates that  
11 report to them for both offices. So I pretty  
12 much oversee all of the operations within those  
13 two offices, and then I report to my leadership,  
14 which is here in Chicago.

15 Q. So for -- you -- at some point, you  
16 said you were assigned to Chicago temporarily.

17 And when was that?

18 A. On the 22nd of September was my first  
19 day.

20 Q. Let me ask you about some of your  
21 specific duties in Chicago.

22 Did you have the duties of  
23 overseeing or supervising logistics, such as  
24 intake, processing, bed space, and  
25 transportation coordination for those

2025 10 23 25 GJ 994 [REDACTED]

Page 7

1 temporarily detained in Broad- -- in the  
2 Broadview facility?

3 A. Yes, ma'am. I was there to assist  
4 the -- AFOD that -- that is permanently there.

5 THE COURT REPORTER: Sorry? The --  
6 BY THE WITNESS:

7 A. AFOD, the assistant field office  
8 director. That's the acronym that we use.  
9 Sorry.

10 BY MS. MECKLENBURG:

11 Q. The government is full of acronyms. We  
12 all know that.

13 We -- and what about -- was it  
14 part of your duties to communicate with upper  
15 management and federal partners to manage  
16 operations and ensure necessary supplies and  
17 proper staffing levels?

18 A. Yes, ma'am.

19 Q. Did you also have the duties of  
20 responding to requests for information both  
21 internally and from the public?

22 A. Yes, ma'am.

23 Q. So when you were temporarily assigned  
24 to Chicago, were you given a place to report for  
25 carrying out your duties?

2025 10 23 25 GJ 994 [REDACTED]

Page 8

1 A. Yes, ma'am.

2 Q. Where was that?

3 A. The Broadview Service Staging Area,  
4 which is 1930 Beach Street in Broadview,  
5 Illinois.

6 Q. And you said that that -- Your first  
7 day at Broadview was September 22nd?

8 A. Yeah. I -- I may have misspoke. My  
9 travel day here was the 22nd. My first day was  
10 the 23rd.

11 Q. So you had been to Broadview starting  
12 on the 23rd?

13 A. Yes, ma'am.

14 Q. Were you staying -- Where were you  
15 staying while -- at that time when you first  
16 started this temporary assignment?

17 Were you staying in a hotel  
18 or --

19 A. Yes, ma'am. I was staying in a hotel  
20 in Westchester.

21 Q. Okay. Let's go -- turn to  
22 September 26th, 2025, at approximately 7:45 a.m.

23 Where were you -- Were you  
24 going somewhere at that time?

25 A. Yes, ma'am. I was -- left my hotel and

2025 10 23 25 GJ 994 [REDACTED]

Page 9

1 was on my way to work there in Broadview.

2 Q. And why were you going there?

3 A. That's where I report daily -- or  
4 reported daily to -- to conduct my duties.

5 Q. What were you wearing that day?

6 A. Well, I was probably dressed very  
7 similar to this. Since I live out of a  
8 suitcase, I just -- I have a polo and, you know,  
9 my normal work pants. I had this jacket on  
10 probably. Anytime that I -- I go out in public,  
11 I -- I cover up with a jacket.

12 Q. And did you have on a mask or -- did  
13 you have a mask on?

14 A. No, ma'am.

15 Q. Can you describe the car that you were  
16 driving?

17 A. So my government-owned vehicle that is  
18 furnished to me is a 2022 Ford Expedition. It's  
19 black in color. It has four doors. Yeah,  
20 black.

21 Q. Is it marked as a law enforcement car  
22 in any way?

23 A. No, ma'am. It's -- it's an unmarked  
24 vehicle, but it has, you know, some subtle  
25 lights on the front that, you know, may --

2025 10 23 25 GJ 994 [REDACTED]

Page 10

1 may -- you know, if you know what you're looking  
2 for, you might know it as a vehicle for law  
3 enforcement.

4 Q. When were you first assigned that car?

5 A. In about April of 2025.

6 Q. Are you permitted to use that car for  
7 non-work purposes?

8 A. No.

9 Q. So can you use that car, for instance,  
10 to go to dinner with your wife or go to the  
11 movies with your family?

12 A. Absolutely not.

13 Q. What is your duty with regard to your  
14 government-issued car?

15 A. Well, my duty with -- with regard to  
16 that is basically to care and maintain for it --  
17 maintain it, to file reports of mileage usage,  
18 you know, fuel usage, and any damage that occurs  
19 to it.

20 Q. What was the general condition of the  
21 car prior to September 26, 2025?

22 A. It was in -- it was in great condition.

23 Q. And how do you know that?

24 A. Well, as part of my duties, I -- every  
25 day I get in and I -- I do a walkaround. I

2025 10 23 25 GJ 994 [REDACTED]

Page 11

1 observe, you know, any new damage. You know,  
2 I'm aware of any new damage because I -- I would  
3 have to report that, and it would be my job to  
4 maintain a professional looking vehicle.

5 Q. And as of the morning of September 26th  
6 before the incident we're going to talk about,  
7 had you reported any damage to that car?

8 A. I had a rock chip in the windshield  
9 that Safelite repaired once.

10 Q. And you reported that?

11 A. Yes.

12 Q. On September 26th, was anyone else in  
13 the car with you when you were driving to work?

14 A. No, ma'am.

15 Q. Did the car have tinted windows?

16 A. My particular car does not have -- It  
17 has factory tints on the back windows and, you  
18 know, regular windows on the -- on the passenger  
19 and driver window.

20 Q. You said that it has lights that could  
21 be recognized as law enforcement.

22 Does it have a siren?

23 A. It does.

24 Q. What about a horn?

25 A. Yes.

2025 10 23 25 GJ 994 [REDACTED]

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1 Q. Did you approach -- that morning at  
2 around 7:45, did you approach the intersection  
3 of 25th and Harvard in Broadview going  
4 southbound on 25th Street?

5 A. Yes, ma'am.

6 Q. And when you reached that intersection,  
7 did you encounter a checkpoint at that point --  
8 at that time?

9 A. Yes, ma'am. There was a -- an officer  
10 standing in the middle of the street, in the  
11 middle of 25th Street and then, you know,  
12 another officer right at the intersection of  
13 Harvard and 25th.

14 Q. But tell us what happened when you  
15 reached that checkpoint.

16 A. Well, I could see there was a  
17 commotion. You know, obviously, I knew that  
18 there was going to be protesting in the area,  
19 and I approached the officer in -- in the middle  
20 of 25th, rolled down my window, and showed him  
21 my credentials. And I told him I was with ICE,  
22 and he moved out of the way and just motioned  
23 for me to -- to go into Harvard Street there  
24 from 25th.

25 When I -- when I did that, the

2025 10 23 25 GJ 994 [REDACTED]

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1 officer that was standing there at -- in the  
2 center of 25th and -- or in the center of  
3 Harvard on the edge of 25th, he -- he moved out  
4 of the way so I could proceed.

5 Q. When you turned onto Harvard, about how  
6 far away were you from the Broadview facility?

7 A. About -- probably about 200 yards.

8 Q. So if nobody had impeded you on your  
9 way there, about how long -- from your  
10 experience on the prior days when you went to  
11 Broadview, about how long would it have taken  
12 you to get to the Broadview facility from where  
13 you turned?

14 A. Probably 20 seconds, maybe 30 seconds.

15 Q. When you turned, what did you see?

16 A. So as I turned, obviously, I had  
17 already noticed that there was a crowd, you  
18 know, blocking 25th. I had already caught their  
19 attention, obviously, because the officers had  
20 let me through.

21 So, you know, they were yelling  
22 and, you know, screaming at me. And I saw that  
23 they were, you know, really just in the middle  
24 of the street, on the side of the street, you  
25 know, all over there. And so I just approached

2025 10 23 25 GJ 994 [REDACTED]

Page 14

1 as the officer kind of motioned me. And, you  
2 know, I expected them to kind of, you know,  
3 separate so I could make a passage through  
4 there.

5 Q. And what happened next?

6 A. Well, there were a couple of people  
7 that initially, you know, got in front of my  
8 vehicle, put their hands on -- on -- on the  
9 front of my vehicle and basically, you know, was  
10 screaming, telling me to stop, you know, calling  
11 me all kinds of vulgar names and -- and things  
12 of that nature.

13 And, you know, I felt like I --  
14 I couldn't stop because of -- of the press. And  
15 so as I began to enter, you know, everyone  
16 surrounded my vehicle. They were banging on the  
17 windows, banging on the hood, you know --

18 Q. Let me stop you for a minute. You  
19 started with saying a couple of people, and then  
20 you said everyone.

21 So did the crowd around --  
22 surrounding your car increase at --

23 A. Oh.

24 Q. -- at some point?

25 A. Yes, definitely.

2025 10 23 25 GJ 994 [REDACTED]

Page 15

1 Q. So once they surrounded your car, what  
2 did you actually -- tell us what you heard and  
3 what you saw.

4 A. Okay. Well, like I said, I could -- I  
5 could hear them, you know, calling me names, you  
6 know, talking about, you know, the size of my  
7 penis, you know, calling me a Nazi, you know,  
8 telling me to quit my job, you know, and things  
9 of that -- and -- you know, but I also could  
10 hear them banging on -- on the windows  
11 particularly.

12 You know, I could hear, you  
13 know, deep sounds like a fist banging on the  
14 window. I could hear, you know, high-pitched  
15 sounds of, you know, like, something was in  
16 their hand or on their hand like a ring or a  
17 piece of wood or something.

18 You know, I could feel the car  
19 shaking. And, you know, I was -- at that point,  
20 you know, I just -- I had it in my mind to just  
21 stay focused on the people that were right in  
22 front of the vehicle, you know, to make sure  
23 that I, you know, could see if someone stumbled  
24 or something in front of my vehicle.

25 And I kept glancing down to

2025 10 23 25 GJ 994 [REDACTED]

Page 16

1 see, you know, how fast, you know, I was going.

2 Q. Let me stop you for a minute.

3 A. Okay.

4 Q. Could you feel the car rocking? Could  
5 you feel the people pushing up against the car?

6 Could you feel rocking at all,  
7 or did you --

8 A. Yes, definitely. It was -- it was --  
9 it was rocking side to side. Probably not so  
10 much back and forth, but, you know, I -- I could  
11 see them, you know, applying pressure and  
12 pushing on the front of the car, but I could  
13 feel it, you know, side to side.

14 Q. And were you concerned at all at that  
15 point that the windows would break?

16 A. Oh, yeah. Definitely. I -- I thought  
17 for sure that I was going to have a broken  
18 window.

19 Q. And did you fear at the -- did you fear  
20 for your safety at that point?

21 A. Yeah. I mean, I definitely felt like  
22 if I stopped and if my windows, in fact, broke  
23 out, that I would probably be drug out of the  
24 car based on everything that they were saying  
25 and just the -- the sheer anger of the crowd,

2025 10 23 25 GJ 994 [REDACTED]

Page 17

1 and it was all focused on me.

2 Q. And were you -- were you -- did you  
3 feel -- did you fear for your safety if you were  
4 taken out of the car, that you would be hurt?

5 A. Yes.

6 Q. When you say -- and I'll go back to now  
7 when you were talking about what you were  
8 focused on, what you were looking at.

9 Can you pick up from there?

10 Why were you -- you said you were focused on the  
11 people at the front.

12 Can you tell us why?

13 A. Yes. So I -- I immediately -- you  
14 know, out of my peripheral, I could see some  
15 people, but I was focused on the people in front  
16 of my car because, you know, I -- I was stuck  
17 between I -- I don't want to hurt anyone, but I  
18 also, you know, feel like if I stop, then I --  
19 I'm going to be hurt.

20 So I just kept focused on those  
21 people, and I just kept creeping forward slowly.  
22 I would glance down at my -- my speedometer,  
23 which is a -- a digital speedometer. So I was  
24 able to see that I was going, you know, between  
25 0 and 1 mile per hour as -- as the crowd was

2025 10 23 25 GJ 994 [REDACTED]

Page 18

1 pressing up against me.

2 I saw, you know, debris being  
3 thrown up on the hood. I saw -- I don't know --  
4 it looked like a -- like a Starbucks coffee  
5 splattered all over my windshield and, you know,  
6 I could just hear the chanting that they were  
7 doing and the -- you know, just the screaming  
8 and yelling that they were doing.

9 Q. Why didn't you call for help?

10 A. Well, again, I -- you know, I was -- I  
11 was focused on, you know, the -- the front of my  
12 vehicle to make sure that I didn't, you know,  
13 run over anyone or anyone stepped -- but I knew  
14 that, you know, the -- the security forces that  
15 were on the -- at the gate there in Broadview  
16 would eventually help if I could get close to  
17 there.

18 But I really didn't -- I really  
19 didn't think about calling out -- honestly, what  
20 went through my mind was, "Wow. You know, this  
21 is what my colleagues have been -- you know,  
22 been experiencing this whole time, and" --

23 Q. Well, let me --

24 A. And the --

25 Q. I don't want to talk about other

2025 10 23 25 GJ 994 [REDACTED]

Page 19

1 incidents with your colleagues today.

2 A. Okay.

3 Q. But -- well, actually, it would be  
4 fair.

5 Did that add to your fear?

6 A. Oh, yeah.

7 Q. Okay.

8 A. Yeah. I mean, you know, just two days  
9 earlier, you know, there was a shooting in  
10 Dallas at an ICE facility. All of that stuff  
11 was, you know, going through my mind when --  
12 when this was happening, so --

13 Q. Did you -- yeah. Did you -- go ahead.  
14 I didn't mean to interrupt you.

15 A. Yeah. So, ultimately, that's -- that's  
16 what I was -- was hyperfocused on was making  
17 sure that, you know, I -- I kept eyes on the  
18 people in front of me for their safety and to  
19 keep -- keep progressing forward just to -- to  
20 keep from stopping in the middle of the crowd.

21 Q. And did you believe that once you got  
22 to the gate of the facility, you would be safe  
23 then?

24 A. Yes.

25 Q. And why was that?

2025 10 23 25 GJ 994 [REDACTED]

Page 20

1           A.     Well, I mean, number one, just from the  
2 distance, you know, I thought that, you know,  
3 they would eventually let me go through. I  
4 mean -- I mean, the police waved me in. So I --  
5 you know, I didn't have any reason to believe  
6 that -- that they wouldn't eventually let me  
7 through, but -- you know, they didn't, but I  
8 knew that there were security forces, you know,  
9 there on -- on the other side of -- of the gate  
10 and -- and that ultimately they would come out  
11 and -- and try and make sure that I had a safe  
12 passage.

13           Q.     Did you use your siren at all?

14           A.     No, I did not.

15           Q.     Why not?

16           A.     Well, it was obvious to me that they  
17 knew that I was law enforcement because of the  
18 things that they were screaming at me, right?  
19 And they were obviously angry. So I just -- I  
20 felt like that could agitate the si- -- the  
21 situation worse. And then the other thing was,  
22 you know, I -- I would have to reach down, you  
23 know, find the -- you know, find the controller  
24 and then activate them.

25                                   And so I just -- really just

2025 10 23 25 GJ 994 I [REDACTED]

Page 21

1 kept my hand on the wheel and my -- my eyes to  
2 the -- to the -- to the front.

3 Q. Did you honk the horn?

4 A. No, I did not.

5 Q. Why not?

6 A. Well, again, I -- I -- I guess in my  
7 mind I -- I knew that they knew I was there,  
8 right? So I didn't need to alert them to my  
9 presence by honking the horn. I -- I felt like  
10 at that point, it just probably would have made  
11 things worse.

12 Q. Did you eventually make it to the gate  
13 of the Broadview facility?

14 A. I did. As I -- as I -- again, slowly  
15 move forward. I kept moving forward closer and  
16 closer to the gate. By that time, I could see  
17 there were a few people that had, you know,  
18 separated from the front of the vehicle. Well,  
19 actually, there -- there was a point where they  
20 called everyone to the front of the vehicle to  
21 try and, you know, get more people in front.

22 But at that point, the security  
23 folks had started engaging them with -- with  
24 pepper balls, and the crowd started to -- to  
25 kind of separate out, which I'd expected long

2025 10 23 25 GJ 994 [REDACTED]

Page 22

1 before that. And then I was able to proceed --  
2 proceed forward.

3 Q. What did you do -- once you got to the  
4 building -- once you got past the gate, what did  
5 you do first -- what did you do?

6 A. Well, the gate is automated, so I had  
7 to wait for the gate to open. And then a few of  
8 the SRT members came out. And, you know, one of  
9 them was wrestling with something underneath my  
10 car. And it turned out it was a skateboard that  
11 had been lodged in the front fender wheel of the  
12 driver's wheel.

13 I -- I -- I gathered it in an  
14 effort to stop the vehicle and -- and get me to  
15 stop there. You know, once he cleared that out,  
16 someone else grabbed, you know, the -- I think  
17 it was a stuffed animal that was up on the --  
18 the hood of the car and threw that off to the  
19 side, and then I proceeded through the gate and  
20 went over and found a parking spot.

21 Q. Do you know what happened to the  
22 skateboard?

23 A. I mean, I believe, he -- you know,  
24 after he got it free, he just tossed it over to  
25 the side. I don't know what ultimately ended up

2025 10 23 25 GJ 994 [REDACTED]

Page 23

1 happening with it.

2 Q. Okay. Once you got into the building,  
3 what did you do?

4 A. Well, once I got parked, I -- I went  
5 into the building. You know, I -- I set down  
6 my -- my computer equipment and all of that  
7 stuff and took a couple deep breaths and, you  
8 know, kind of realized that I was out of -- out  
9 of harm's way at that point and then went back  
10 out to see if, you know, there was anything else  
11 I could do as far as, you know, helping secure  
12 the area, and then I went to my vehicle and --  
13 and, you know, kind of did a walkaround to  
14 assess the damage.

15 Q. Okay. And we'll go into that in a  
16 minute, too.

17 Were you -- were you rattled at  
18 that time?

19 A. Oh, yeah, yeah. I mean, I -- I'm  
20 surprised how rattled I was. You know, I mean,  
21 I kept -- I -- over and over I kept hearing, you  
22 know, the chants and the yelling. You know,  
23 it's just like it was kind of burned into my  
24 mind. Particularly the chant. You know how you  
25 can remember a song from, you know, 1972? You

2025 10 23 25 GJ 994 [REDACTED]

Page 24

1 know, the song still kind of sticks in my mind.

2 Q. Did you -- did you change your hotel  
3 after that?

4 A. I did. I did. There were --

5 Q. Why did you change your hotel?

6 A. Well, there were reports of officers  
7 being doxed and, you know, protesters showing up  
8 at hotels, and because, you know, my vehicle had  
9 appeared, you know, on social media and all of  
10 that, you know, my leadership thought it would  
11 be a -- a good idea for me to park that vehicle  
12 and then also to change hotels.

13 Q. So you changed cars and hotels?

14 A. Yes, ma'am.

15 Q. Now, when -- how soon after you  
16 got in -- through the gate did you actually  
17 examine your car?

18 You started to tell us that.

19 A. I mean, I would say it was probably  
20 within 10 minutes.

21 Q. Okay.

22 A. I mean, after I walked inside, came  
23 back, and walked around the vehicle.

24 Q. I'm just pulling up some pictures.

25 A. Yes, ma'am.

2025 10 23 25 GJ 994 [REDACTED]

Page 25

1 MS. MECKLENBURG: Thanks, Matt.

2 BY MS. MECKLENBURG:

3 Q. When you first examined your car after  
4 this incident, did you see dents in the hood?

5 A. Yes.

6 Q. I'm showing you what has been marked as  
7 Photo 15, and then I'm going to show you  
8 Photo 13, and ask you -- First of all, 13, is  
9 that your car that we're looking at?

10 (Grand Jury Exhibit 1, Photo 13,  
11 displayed on the monitor screen  
12 for the Grand Jurors.)

13 BY THE WITNESS:

14 A. Yes, ma'am.

15 BY MS. MECKLENBURG:

16 Q. And then does that photo accurately  
17 depict what your car looked like after this  
18 incident you just described?

19 A. Yes.

20 Q. And Photo 15, does that photo  
21 accurately depict a dent in your car after this  
22 incident?

23 (Grand Jury Exhibit 1, Photo 15  
24 displayed on the monitor screen  
25 for the Grand Jurors.)

2025 10 23 25 GJ 994 [REDACTED]

Page 26

1 BY THE WITNESS:

2 A. Yes, ma'am.

3 BY MS. MECKLENBURG:

4 Q. And that -- was that dent there before  
5 you drove to work that day?

6 A. No, ma'am.

7 Q. When you examined the car after the  
8 incident, did you see scratches on the car?

9 A. I did.

10 Q. I'm going to show you some photos.

11 And is that -- does that Photo  
12 No. 6 -- I'm showing you Photo 16 -- what's been  
13 marked as photo 16.

14 And these photos are part of  
15 Grand Jury Exhibit 1, which is the disk -- the  
16 stick that I showed you two weeks ago.

17 Are these photo -- does this  
18 Photo 16 accurately depict the scratches that  
19 you saw in your car after the incident?

20 (Grand Jury Exhibit 1, Photo 16,  
21 displayed on the monitor screen  
22 for the Grand Jurors.)

23 BY THE WITNESS:

24 A. Yes, ma'am. This is about where the  
25 skateboard was jammed into the -- the front

2025 10 23 25 GJ 994 [REDACTED]

Page 27

1 there.

2 BY MS. MECKLENBURG:

3 Q. So we see some scratches right in front  
4 of the wheel?

5 A. Yes.

6 Q. That's where I'm looking. Okay.

7 A. Yeah. Right in front of the wheel and  
8 also the edge there on the -- on the bumper  
9 cover is scratched there from the -- the  
10 skateboard, I believe.

11 Q. Got it.

12 A. And there's also an example of the  
13 lights -- they're subtle -- there in the grill  
14 that you were asking about earlier.

15 Q. Okay. And these are the lights you're  
16 talking about, right?

17 A. No, ma'am. Just -- just -- just below  
18 the Ford symbol there's two little lights that,  
19 you know, might be a subtle indicator that it's  
20 a law enforcement vehicle.

21 Q. Around this Ford symbol?

22 A. Yep, below it.

23 Q. Below it.

24 Oh, these two?

25 A. Yes, ma'am.

2025 10 23 25 GJ 994 [REDACTED]

Page 28

1 Q. Okay. Thank you. They are subtle.

2 Do you -- let me show you Photo  
3 Exhibit 17.

4 And do you see the scratches on  
5 the car there?

6 (Grand Jury Exhibit 1, Photo 17,  
7 displayed on the monitor screen  
8 for the Grand Jurors.)

9 BY THE WITNESS:

10 A. Yes, ma'am.

11 BY MS. MECKLENBURG:

12 Q. Does this photo actual -- accurately  
13 depict what your car looked like after the  
14 incident?

15 A. Yes, ma'am.

16 Q. I will show you 18.

17 Do you -- the -- see scratches  
18 in Photo 18?

19 (Grand Jury Exhibit 1, Photo 18,  
20 displayed on the monitor screen  
21 for the Grand Jurors.)

22 BY THE WITNESS:

23 A. Yes, ma'am.

24 BY MS. MECKLENBURG:

25 Q. And does that Photo 18 accurately

2025 10 23 25 GJ 994 [REDACTED]

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1 depict what your car looked like before the  
2 incident?

3 A. Yes, ma'am.

4 GRAND JUROR: Before the incident?

5 BY MS. MECKLENBURG:

6 Q. I'm sorry. After the incident..

7 A. Yes. Yes, ma'am. Sorry. It --

8 Q. Both of us.

9 And I will ask you at the end  
10 of all these scratches if they were there before  
11 the incident, but let me get through a few more.

12 This is Photo 36.

13 Do you see scratches in that  
14 photo?

15 (Grand Jury Exhibit 1, Photo 36,  
16 displayed on the monitor screen  
17 for the Grand Jurors.)

18 BY THE WITNESS:

19 A. Yes, ma'am.

20 BY MS. MECKLENBURG:

21 Q. Does that photo accurately depict what  
22 your car looked like after the incident?

23 A. Yes, ma'am.

24 MS. MECKLENBURG: By the way, it's  
25 nice to know you're paying attention.

2025 10 23 25 GJ 994 [REDACTED]

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1 BY MS. MECKLENBURG:

2 Q. Again, I'm showing you Photo 41.

3 Do you see a scratch there?

4 (Grand Jury Exhibit 1, Photo 41,

5 displayed on the monitor screen

6 for the Grand Jurors.)

7 BY THE WITNESS:

8 A. Yes, ma'am.

9 BY MS. MECKLENBURG:

10 Q. And does that accurately depict -- does

11 that photo accurately depict a scratch that was

12 on your car after the incident?

13 A. Yes, ma'am.

14 Q. And, finally, I'm going to show you

15 Photo 42 and ask you if you see a scratch there.

16 (Grand Jury Exhibit 1, Photo 42,

17 displayed on the monitor screen

18 for the Grand Jurors.)

19 BY THE WITNESS:

20 A. I do.

21 BY MS. MECKLENBURG:

22 Q. And does that photo accurately depict

23 the scratch that was on your car after the

24 incident?

25 A. Yes, ma'am.

2025 10 23 25 GJ 994 [REDACTED]

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1 Q. Were -- any of the scratches that I  
2 just showed you in all of those photos: 16, 17,  
3 18, 36, 41, 42, were any of those scratches on  
4 the car before the incident when the crowd  
5 surrounded your car?

6 A. No, ma'am.

7 Q. When you examined the car after the  
8 incident, did you see that the passenger side  
9 mirror was broken?

10 A. Yes, ma'am.

11 Q. I'm showing you what has been marked as  
12 Exhibit -- as Photo 48, and then I am going to  
13 show you 49.

14 So I will give you a minute to  
15 take a look at 48.

16 (Grand Jury Exhibit 1, Photo 48,  
17 displayed on the monitor screen  
18 for the Grand Jurors.)

19 BY THE WITNESS:

20 A. Okay.

21 BY MS. MECKLENBURG:

22 Q. And 49.

23 Do you see that this -- do  
24 these photos accurately depict the passenger  
25 side mirror after the incident?

2025 10 23 25 GJ 994 [REDACTED]

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1 (Grand Jury Exhibit 1, Photo 49,  
2 displayed on the monitor screen  
3 for the Grand Jurors.)

4 BY THE WITNESS:

5 A. Yes, ma'am.

6 BY MS. MECKLENBURG:

7 Q. And was that mirror broken, in that  
8 condition, before the incident?

9 A. No.

10 Q. When you examined the car after the  
11 incident, did you see that the rear windshield  
12 wiper was broken off?

13 A. I did.

14 Q. I'm going to show you two photos. Let  
15 me get these.

16 And does that -- is that photo  
17 an accurate depiction of your car from the rear  
18 after the incident?

19 (Grand Jury Exhibit 1, Photo 38,  
20 displayed on the monitor screen  
21 for the Grand Jurors.)

22 BY THE WITNESS:

23 A. Yes, ma'am.

24 BY MS. MECKLENBURG:

25 Q. And do you see -- was -- does that show

2025 10 23 25 GJ 994 [REDACTED]

Page 33

1 the broken rear wipe- -- windshield wiper?

2 BY THE WITNESS:

3 A. Yes, ma'am.

4 BY MS. MECKLENBURG:

5 Q. I am going to show you 39.

6 Is -- does 39 -- does the photo  
7 marked 39 also accurately depict what the back  
8 of your car looked like after the incident?

9 (Grand Jury Exhibit 1, Photo 39,  
10 displayed on the monitor screen  
11 for the Grand Jurors.)

12 BY THE WITNESS:

13 A. Yes, ma'am.

14 BY MS. MECKLENBURG:

15 Q. Was the rear windshield wiper broken  
16 before the incident when the crowd surrounded  
17 your car?

18 A. No.

19 Q. Did you see the word "pig" etched into  
20 the side of your car?

21 A. I did.

22 Q. And was that on the passenger side?

23 A. Yes, ma'am, on the passenger side rear  
24 door.

25 Q. Okay. I am going to show you three

2025 10 23 25 GJ 994 [REDACTED]

Page 34

1 photos. So let's look at each one first.  
2 That's it. That's one. I'm showing you 45 --  
3 44, 45, and 46. I'm going to show you 46 next.  
4 For the record, it's 44, 45, and 46.

5 Do those photos accurately  
6 depict where you saw the word "pig" etched into  
7 your car after the incident?

8 (Grand Jury Exhibit 1, Photo 44,  
9 45, 46, displayed on the  
10 monitor screen for the Grand  
11 Jurors.)

12 BY THE WITNESS:

13 A. Yes, ma'am.

14 BY MS. MECKLENBURG:

15 Q. And was the word "pig" etched into the  
16 side of your car before the incident when the  
17 crowd surrounded your car?

18 A. No.

19 Q. Did any of the damage that you observed  
20 after the incident exist before the incident?

21 A. No, ma'am.

22 Q. When the crowd surrounded your car and  
23 the people were banging on the car and banging  
24 on the windows and pushing against the car and  
25 chanting, did you feel intimidated?

2025 10 23 25 GJ 994 [REDACTED]

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1           A.     Yes, ma'am. I felt like they were  
2 trying to keep me from getting to work to do my  
3 job.

4           Q.     And did you feel -- when that was  
5 happening, did you feel threatened?

6           A.     I did.

7                   MS. MECKLENBURG: I have no further  
8 questions.

9                                 If you would like to ask  
10 Mr. [REDACTED] any questions.

11                   GRAND JUROR: I --

12                   MS. MECKLENBURG: Let's go there, and  
13 then I'll come to you, sir.

14                   GRAND JUROR: Were -- were you armed  
15 in your car?

16                   THE WITNESS: Yes, ma'am. I'm -- I'm  
17 authorized to carry off duty and on duty.

18                   GRAND JUROR: Okay.

19                   MS. MECKLENBURG: Did you use your  
20 firearm at all during the incident?

21                   THE WITNESS: No.

22                   GRAND JUROR: When the -- when you  
23 first rolled down your window and talked to the  
24 officer, did either he mention or did you notice  
25 at any time the -- all of -- because in the

2025 10 23 25 GJ 994 [REDACTED]

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1 video, there's -- you see a bunch of what --  
2 news -- what appeared to be news cameras.

3 Did you notice any of those, or  
4 did he mention to you that there is news people  
5 out there filming or anything like that?

6 THE WITNESS: I -- I don't know that  
7 I recognized any news outlets. But, you know, I  
8 did notice that a lot of people were videoing,  
9 you know, which is kind of a normal tactic.  
10 They try and capture a picture of our face, and  
11 we were -- we were alerted to that kind of thing  
12 when we first got here. But I -- I didn't  
13 notice any, you know, specific news outlets, no.

14 MS. MECKLENBURG: And the police  
15 officer didn't say anything to you about that?  
16 That was the first part of the question.

17 THE WITNESS: No, no.

18 MS. MECKLENBURG: Okay.

19 THE WITNESS: He -- he didn't say  
20 anything about -- he didn't say anything to me  
21 other than just kind of gesture for me to, you  
22 know, proceed.

23 GRAND JUROR: Thank you.

24 THE WITNESS: Yeah. I'm curious.  
25 Did -- do you have any idea why the local

2025 10 23 25 GJ 994 [REDACTED]

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1 Bridgeview police didn't try to disperse that  
2 crowd from enclosing in on you like that?

3 MS. MECKLENBURG: If you don't know,  
4 you can say you don't know.

5 GRAND JUROR: Yeah. I mean --

6 THE WITNESS: I mean, I -- I would  
7 say I don't want to --

8 MS. MECKLENBURG: Don't speculate.

9 THE WITNESS: I don't want to -- I  
10 don't want to put thoughts into those officers'  
11 minds, but I know politically, you know,  
12 we've -- we've struggled with getting them to  
13 help.

14 MS. MECKLENBURG: Am I missing --

15 GRAND JUROR: You mentioned -- this  
16 happened on September 26th, right?

17 THE WITNESS: Yes, ma'am. It was --

18 GRAND JUROR: And then you mentioned  
19 an incident --

20 THE WITNESS: Right.

21 GRAND JUROR: On September 24th.

22 Were you referring to the  
23 incident in Dallas where a gunman opened fire on  
24 an ICE facility, and three people were killed?

25 THE WITNESS: Yes, ma'am. We -- we

2025 10 23 25 GJ 994 [REDACTED]

Page 38

1 received, you know, alerts about that stuff  
2 through our normal communication, and that --  
3 that was -- that was what I was referring to.

4 MS. MECKLENBURG: And I ask that you  
5 consider that testimony only for whether this  
6 officer was in fear or felt threatened or  
7 intimidated, but not for that incident itself.

8 MS. MECKLENBURG: Yes.

9 THE WITNESS: Yes, ma'am.

10 GRAND JUROR: Have you been in any  
11 situations similar to this prior to this event?

12 THE WITNESS: No. I would say this  
13 is -- this is the first time that I ever had  
14 a -- you know, an event like this occur.

15 MS. MECKLENBURG: Any other  
16 questions?

17 GRAND JUROR: Yeah.

18 MS. MECKLENBURG: Oh, one more. Oh,  
19 over here.

20 GRAND JUROR: Go ahead.

21 MS. MECKLENBURG: We will go down  
22 there.

23 GRAND JUROR: You were away from your  
24 car like ten minutes before you did a  
25 walkaround?

2025 10 23 25 GJ 994 [REDACTED]

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1 THE WITNESS: Yes. I went inside to  
2 put in -- put my gear at my desk and then came  
3 back outside.

4 MS. MECKLENBURG: You don't think  
5 anybody else caused that damage to make it look  
6 more --

7 THE WITNESS: I don't -- I don't  
8 believe so.

9 MS. MECKLENBURG: Let me ask you,  
10 during that time, was your car in a secure area?

11 THE WITNESS: Yes, ma'am, behind the  
12 gate at 1930 Beach. We call it the G4 gate.  
13 You know, it is secured parking for our  
14 vehicles.

15 MS. MECKLENBURG: And are there  
16 cameras there?

17 THE WITNESS: Yes.

18 MS. MECKLENBURG: Do you have any  
19 evidence at all that other agents came along and  
20 did all that so that we could do all this today?

21 THE WITNESS: No. I -- I -- I don't  
22 have any evidence of that.

23 MS. MECKLENBURG: Okay. Thank you.

24 I saw another question, I  
25 think.

2025 10 23 25 GJ 994 [REDACTED]

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1 GRAND JUROR: Yeah. I have to think  
2 about how I want to phrase it.

3 In your ICE training, did they  
4 train you for this sort of scenario? Have you  
5 had any special training for something like  
6 this?

7 THE WITNESS: No. I -- I would say  
8 for this specific instance, they don't, you  
9 know, give you training on how to, you know,  
10 handle a situation of, you know, a crowd that's,  
11 you know, angry and, you know, surrounding you.  
12 So, no, I -- I would say no.

13 MS. MECKLENBURG: In the end, though,  
14 nobody was hurt, right?

15 THE WITNESS: Correct.

16 MS. MECKLENBURG: Any other  
17 questions?

18 (No response.)

19 MS. MECKLENBURG: Thank you,  
20 Mr. [REDACTED]

21 If you will wait outside, we'll  
22 come out.

23 MADAM FOREPERSON: Thank you.

24 GRAND JUROR: Thank you.

25 THE WITNESS: Thank you, everyone.

2025 10 23 25 GJ 994 [REDACTED]

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1 (Whereupon, there being no  
2 questions by the Grand Jurors,  
3 the witness was excused.)  
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2025 10 23 25 GJ 994 I [REDACTED]

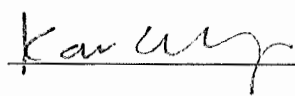
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C E R T I F I C A T E

I, KARI WIEDENHAUPT, a Shorthand Reporter, do hereby certify that I reported the proceedings before the Federal Grand Jury in the Grand Jury Room in the United States Courthouse in Chicago, Illinois and that the foregoing is a true and accurate transcription of my stenographic notes and is a true record of the testimony given by the foregoing witness.

I further certify that I am not employed by or related to any party to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

  
\_\_\_\_\_

Kari Wiedenhaupt, CSR.

C.S.R. NO. 084-004725