

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

STATE OF ILLINOIS, et al.	)	
	)	
<i>Plaintiffs,</i>	)	
	)	No. 25-cv-12174
v.	)	Hon. April M. Perry
	)	
DONALD TRUMP, et al.	)	
	)	
<i>Defendant</i>	)	

DECLARATION OF MAJOR GENERAL NIAVE F. KNELL

I, Niave Knell, hereby state and declare as follows:

1. I am currently the Deputy Commanding General for Operations for the United States Army North Command (ARNORTH), which is the Army Service Component Command of the United States Northern Command (USNORTHCOM). I have held this position since August 24, 2024. I have served as a commissioned Army Officer for more than 33 years. My current responsibilities include overseeing the daily operations of ARNORTH as well as ensuring the training, discipline, and readiness of the units under ARNORTH's command. I have reviewed the Complaint in the matter of *State of Illinois, et al. v. Donald Trump, et al.*, Case No. 1:25-CV-12174 (N.D. Ill.). This declaration is based on my personal knowledge, as well as information made available to me during the routine execution of my official duties.
2. USNORTHCOM is one of Department of War's (DoW's) eleven unified combatant commands. Its mission is to provide command and control of the DoW homeland defense efforts and to coordinate defense support of civil authorities. ARNORTH supports USNORTHCOM in its mission as the Army Service Component Command (ASCC) and Joint Forces Land Component Command for USNORTHCOM.

3. When federalized, members of the State National Guard serve pursuant to Title 10 of the United States Code under the command of the President and the Secretary of War. In this case, ARNORTH has been delegated operational control of members of the California, Illinois, and Texas National Guards who are in a Title 10 status.

4. This declaration is submitted in response to ECF No. 30, wherein the Court directed the Defendants to answer three questions: “(1) when National Guard troops will arrive in Illinois; (2) what municipalities within Illinois troops will be sent to; and (3) what the scope of the troops’ activities will be once [there].”

5. As of 1500 Central Daylight Time (CDT) October 8, 2025, there are approximately 200 federalized National Guardsmen in the State of Illinois. The Illinois Army National Guard has been authorized to mobilize 300 members of the Army National Guard, who are currently mustering to ensure readiness for Title 10 mobilization. It is anticipated the Illinois Army National Guard will begin the protection mission after they are appropriately mobilized and trained. Currently, all the federalized National Guardsmen are based out of Joliet, Illinois. Fourteen members of the federalized California Army National Guard arrived in Illinois on 7 October 2025 to provide mobilization training to the other federalized National Guard forces, and share any relevant lessons learned from the federal protection mission in California. ARNORTH does not anticipate the federalized California Army National Guardsmen will perform missions beyond providing training and subject matter expertise.

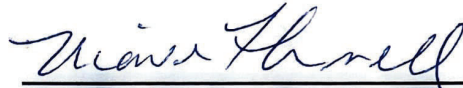
6. On 7 October 2025, the federalized Texas National Guardsmen arrived in Illinois and conducted a site visit to the Broadview, Illinois Immigrations and Customs Enforcement Facility in preparation for their 200 members to begin federal protection operations on 8 October 2025.

7. The current area of operations for all federalized National Guard deployed to Illinois is primarily within Cook County, Illinois. The area of operations denotes where members of the federalized National Guard are performing federal protection functions, namely, to protect federal property, personnel, and ensure federal personnel can perform federal functions. It is possible that the area of operations could change as situations develop on the ground.

8. Federalized National Guardsmen will perform duties in accordance with the federal protection mission as authorized by the President in his October 4, 2025 Memorandum and the Secretary of War Memoranda, filed contemporaneously. By DoW policy, the scope of the National Guard activities will be in response to requests for assistance from Federal Government agents and agencies only when they are related to protection of federal personnel performing official functions, as well as requests for protection duties such as protection of federal buildings. The federalized National Guard will not be engaged in law enforcement activities. ARNORTH will review the requests for compliance with the current mission authorities, route the requests to the appropriate ARNORTH approval authority, and once approved, assign federalized National Guard personnel accordingly.

9. As of 1430 CDT on October 8, 2025, ARNORTH has received two requests for protection support. First, the Department of Homeland Security (DHS) requested federalized National Guard personnel to support protection of federal property and personnel at the Immigration and Customs Enforcement facility in Broadview, Illinois. Second, the Federal Protective Service (FPS) requested federalized National Guard personnel to support protection of the Federal District Court on Friday, October 10, 2025 due to two high profile cases involving DHS activities and personnel in the Chicago, Illinois metropolitan area.

10. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in dark ink, appearing to read "Niave F. Knell", written over a horizontal line.

MAJOR GENERAL NIAVE F. KNELL
DEPUTY COMMANDING GENERAL
U.S. Army North, U.S. Army Northern Command