

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

STATE OF ILLINOIS, et al.

Plaintiffs,

v.

DONALD TRUMP, et al.

Defendant

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No. 25-cv-12174
Hon. April M. Perry

DECLARATION OF MAJOR GENERAL NIAVE F. KNELL

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

1. In a declaration signed on October 8, 2025, I stated, “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.”
2. The court has ordered additional explanation about this statement, specifically regarding the second request for assistance. Additional information regarding that request follows.
3. Various federal partner agencies in Chicago have created an inter-agency task force to allow for joint communication and planning of operations. After a joint meeting on October 8, 2025, the Deputy Regional Director of the FPS, Region 5, verbally requested personnel to protect Federal buildings in the Federal Plaza area on Friday, October 10, 2025, due to cases

involving DHS activities and personnel in the Chicago, Illinois metropolitan area. FPS was directed to submit a formal request in writing using the designated form for all requests for assistance. To date, I have not received a written request. Currently without FPS reconfirming the need through a written request or otherwise, ARNORTH does not intend to support this request.

4. All requests for assistance are evaluated on a case-by-case basis based on the legality of the request, necessity of the request, the danger posed, the number of troops requested, and other operational considerations.

5. At the time, I was not aware the request to protect the Federal Plaza did not include the Federal District Court. Accordingly, to clarify the facts I declared in ECF 73 in this case, the request was for the protection of the Federal Plaza and the Federal buildings in the immediate area, not for the Federal District Court building itself. To date, there are no requests from the U.S. Marshals Service, and there are no plans for the National Guard to be at the courthouse.

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



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