

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

COLE SHERIDAN

UNDER SEAL

No. 25 CR 634

Chief Judge Virginia M. Kendall

The government respectfully submits that the following factors support its request for a 5-day extension of time from November 3, 2025 to and including November 7, 2025, in which to seek an indictment in this matter.

1. On October 3, 2025, the government arrested defendant Cole Sheridan for forcibly assaulting, resisting, opposing, impeding, and interfering with a federal officer while engaged in the performance of his official duties, in violation of Title 18, United States Code, Section 111(a)(1), and on October 4, 2025 charged him by complaint with that offense.

2. The incident occurred at approximately 9.30 AM on October 3, 2025, immediately outside the Department of Homeland Security (DHS) facility in Bridgeview, Illinois. Sheridan was one of a large crowd of protesters that were being moved by federal law enforcement officers and agents, and Illinois State Police Troopers, out of the roadway in front of the DHS facility to enable government vehicles to enter and leave the facility unimpeded and safely.

3. On October 6, 2025, the defendant had his initial appearance and a detention hearing before Magistrate Judge Heather McShain and was released on his own recognizance. Dkt. 8. On October 9, 2025, Magistrate Judge McShain conducted

a preliminary hearing in this matter, and on October 10, 2025 found that with the exception of "assault" there was probable cause to believe the offense alleged in the complaint was committed by Sheridan, and ordered him bound over to the District Court for further proceedings. Dkt. 14.

4. Sheridan was arrested for forcibly interfering with Chief Border Patrol Agent Gregory Bovino when Sheridan pushed back against and grappled with Chief Bovino after Chief Bovino had lawfully ordered Sheridan to move back to a safe area just off the roadway entrance to the DHS facility. Sheridan's resistance caused him, Chief Bovino, and another unidentified Border Patrol Agent (BPA) to go to the ground in a tangle, resulting in Chief Bovino suffering a strained groin muscle that required medical treatment about two hours after Sheridan's arrest, including an MRI examination and medication, and an order by the treating physician that Chief Bovino not engage in any physical activity for several weeks, and return for a second MRI in that time period to ensure he did not require surgery on his groin muscle.

5. Between October 4 and October 30, 2025, the government investigated the incident resulting in Sheridan's arrest, including interviewing the personnel involved in the incident and arrest. The investigation also involved reviewing video from Body Worn Cameras (BWCs) by several Border Patrol Agents, including BPA [REDACTED], who was next to Chief Bovino during the Sheridan arrest and captured the initial stages of the confrontation between Sheridan and Bovino on his video, but did not capture the actions that led Chief Bovino and Sheridan to fall to the ground. Deputy Chief Border Patrol Agent [REDACTED] was also a witness to the confrontation

between Chief Bovino and Sheridan, including witnessing Sheridan push back against and grapple with Chief Bovino and fall to the ground.

6. On Thursday, October 30, 2025, the evidence in this matter was presented to the Special June 2024 Grand Jury for approximately 75 minutes. The government presented the evidence through the testimony of a Department of Homeland Security – Homeland Security Investigations (DHS-HIS) case agent and Deputy Chief [REDACTED]. It also had BPA [REDACTED] available to testify; Chief Bovino was in a 5-hour deposition ordered by Judge Sara Ellis in *Chicago Headline Club et al v. Noem et al*, 25 CV 12173, a matter involving use-of-force procedures during CBP and ICE law enforcement operations in Chicago recently, among other issues, and was unavailable to appear before the grand jury. At approximately 4.55 PM, 25 minutes after the scheduled end of the grand jury session, the grand jurors requested to hear from Chief Bovino. However, at that time the grand jury had already stayed 25 minutes beyond their scheduled time and determined to recess for the week. They therefore requested that Chief Bovino and BPA [REDACTED] return to testify on their next date, Thursday, November 6, so they could properly consider all the relevant evidence in this matter before voting on whether to return the proposed indictment against Sheridan for a violation of 18 U.S.C. § 111.

7. The government respectfully submits that these circumstances justify the requested 5-day extension of time to allow the grand jury to appropriately consider whether to return an indictment in this matter, pursuant to 18 U.S.C. §§ 3161(h)(7)(B)(i) and (iv).