

# EXHIBIT A

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

2

3

4

5

BEFORE THE FEDERAL GRAND JURY

6

(Special June 2024 Grand Jury)

7

8

9

October 9, 2025

10

2:28 o'clock p.m.

11

12

13

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

16

17

18

19

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

22

23

24

25



2

1

I N D E X

2

3

PAGES

4

Direct Examination by Ms. Mecklenburg.... 3 - 76

5

6

7

E X H I B I T S

8

PAGES

9

Grand Jury Exhibit 1

14

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25



3

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

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

13

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

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 --

↑

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 --



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.

↑

64

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,

↑

65

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

↑

66

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

↑

67

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

↑

68

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 director of facilities. So he is there to go and

↑

69

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

↑

70

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."

↑

71

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

↑

72

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.

↑

73

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.

↑

74

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 --

↑

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.



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

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25



77

1

C E R T I F I C A T E

2

3

4

5

I, STEVEN J. BRICKEY, CSR, RMR, CRR do

6

hereby certify that I reported the proceedings had

7

in the above matter before the Federal Grand Jury

8

in the Grand Jury Room in the United States Court

9

House at Chicago, Illinois, on the 9th day of

10

October, 2025, and that the foregoing is a true

11

and accurate transcript of said proceedings.

12

13

\_\_\_\_\_

14

Steven J. Brickey, CSR, RMR, CRR

15

084-004675

16

17

18

19

20

21

22

23

24

25