



Chicago Council OF LAWYERS

Chicago's public interest bar association

October 24, 2025

The Honorable J.B. Pritzker
Governor of the State of Illinois
Office of the Governor
Springfield, Illinois

Dear Governor Pritzker:

The Chicago Council of Lawyers writes to express its appreciation for your steady leadership at a time when public confidence in law enforcement and the rule of law is under considerable strain. We recognize and applaud your recent statements rejecting attempts by President Trump to justify the deployment of National Guard troops to Chicago under the pretext of restoring order.

Recent demonstrations outside the Immigration and Customs Enforcement Processing Center in Broadview have drawn renewed attention to the tension between lawful assembly and public order. Following the federal court's order for the removal of barriers around the facility, hundreds of Illinois residents have resumed peaceful protest. Illinois State Police, operating in coordination with the Cook County Sheriff's Department and Broadview Police, have managed large, often emotional gatherings. The federal government's prior use of tear gas, rubber bullets, pepper balls, and chemical agents against peaceful demonstrators at Broadview was unconstitutional, dangerous and deeply disturbing. Your clear opposition to such practices demonstrated principled leadership.

At the same time, we believe that legitimate public safety objectives must remain harmonized with the foundational First Amendment principles that guarantee the freedom of expression and assembly. Recent developments in Broadview—including a municipal executive order restricting protest hours to between 9 a.m. and 6 p.m. and establishing protest areas enclosed by concrete barriers—risk upsetting that careful balance. Supreme Court precedent establishes that any time, place, or manner restriction must be narrowly tailored to real and demonstrable safety needs. Blanket curfews and spatial barriers, especially where peaceful gatherings have been the norm, impose burdens inconsistent with established constitutional and professional standards.

We respectfully urge review of the Village of Broadview's protest restrictions, and the discretion afforded to law enforcement in their enforcement. State Police officers should, wherever possible, interpret the Mayor's executive orders with flexibility consistent with the overarching duty to *facilitate*—not merely to control—peaceful protest. The modest expansion of protest zones to accommodate increased crowd sizes would align Illinois' approach with national best practices endorsed by the U.S. Department of Justice's Office of Community Oriented Policing Services and the Police Executive Research Forum. Similarly, allowing reasonable discretion beyond the literal hours of the municipal

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curfew, where no public safety risk is apparent, would model the principle of proportional restraint articulated in the Department of Justice's 2022 "Recommendations for Law Enforcement Response to Mass Demonstrations."

In our view, these measures would not compromise order or officer safety. Rather, they would underscore Illinois' independence from federal attempts to perpetuate a false narrative of disorder—a narrative designed to rationalize a federal military intervention in our communities. Responsible, transparent, and constitutionally grounded state-level policing is the most powerful refutation of that false premise.

To that end, we respectfully suggest that the Illinois State Police consider the following limited reforms:

Establish a civil liberties liaison to facilitate communication among commanding officers, community organizations, and protest participants at the Broadview site, recognizing that the demonstrations there are genuinely grassroots in nature.

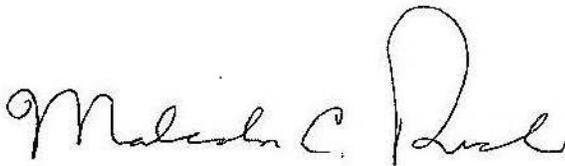
Issue public guidance clarifying that the State Police will evaluate time and area restrictions for reasonableness, with a presumption toward allowing the fullest possible exercise of free expression and assembly.

Work with municipalities to implement proven dialogue policing measures—such as deploying trained liaison officers and prioritizing communication and de-escalation in protest settings—rather than relying on coercive enforcement.

Our request is grounded in humility. The Council does not presume expertise in policing. Rather, we offer the perspective of lawyers and officers of the court who believe that respect for constitutional rights is at the heart of any fair and trustworthy approach to public safety. The Council looks forward to continuing its work with your administration and law enforcement leaders to strengthen Illinois' approach to managing protests in a way that upholds respect, accountability, and the rights of peaceful expression.

We would welcome the opportunity for dialogue or consultation with your staff, as well as with Illinois State Police leadership, to further refine these recommendations.

With respect and appreciation,

A handwritten signature in black ink, appearing to read "Malcolm C. Rich". The signature is written in a cursive, flowing style with a large, prominent initial "M".

Malcolm C. Rich, signing on behalf of:

David Melton and Carl Royal, co-chairs of the Civil Liberties Committee of the Chicago Council of Lawyers

For more information, please contact Chicago Council of Lawyers Board Member, Robert Held at robertsheld@gmail.com.

cc: Honorable Mayor Katrina Thompson