

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

STATE OF ILLINOIS, et al.,  Plaintiff(s),  v.  DONALD J. TRUMP, et al.,  Defendants,	Case No.: 25-cv-12174  Judge April M. Perry
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**BRIEF OF *AMICI CURIAE* FORMER U.S. ARMY AND NAVY SECRETARIES AND  
RETIRED FOUR-STAR ADMIRALS AND GENERALS  
IN SUPPORT OF NEITHER PARTY**

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## TABLE OF CONTENTS

	<b>Page</b>
TABLE OF AUTHORITIES .....	2
INTEREST OF <i>AMICI CURIAE</i> .....	1
INTRODUCTION .....	2
FACTUAL BACKGROUND.....	4
ARGUMENT .....	7
I.    The Posse Comitatus Act Prohibits the Military from Acting as Domestic Law Enforcement Absent Express Congressional Authorization.....	7
II.   The Posse Comitatus Act Permits Non-Law-Enforcement Uses of Military Personnel for National Security and Civil Support; Violations Divert Them from Their Primary Mission .....	9
III.  National Guard Personnel Are Not Sufficiently Trained to Operate in the Context of Domestic Law Enforcement .....	13
IV.  To Avoid Politicization of the Military, Deploying Military Personnel to Assist with Law Enforcement Should Be a Last Resort.....	16
CONCLUSION.....	23
APPENDIX.....	24

## TABLE OF AUTHORITIES

	Page
<b>Cases</b>	
<i>Bissonette v. Haig</i> , 776 F.2d 1384 (8th Cir. 1985) .....	14
<i>Greer v. Spock</i> , 424 U.S. 828 (1976).....	17, 20
<i>Ill. v. Trump</i> , No. 1:25-cv-12174 (N.D. Ill. Oct. 6, 2025) .....	13
<i>Laird v. Tatum</i> , 408 U.S. 1 (1972).....	7
<i>Newsom v. Trump</i> , 786 F. Supp. 3d 1235 (N.D. Cal. 2025) .....	4, 19, 21
<i>United States v. Allred</i> , 867 F.2d 856 (5th Cir. 1989) .....	17
<i>United States v. Casper</i> , 541 F.2d 1275 (8th Cir. 1976) .....	15
<i>United States v. McArthur</i> , 419 F. Supp. 186 (D.N.D. 1975).....	14
<i>United States v. Red Feather</i> , 392 F. Supp. 916 (D.S.D. 1975) .....	15
<b>Statutes</b>	
10 U.S.C. § 12406.....	4, 6
10 U.S.C. § 253.....	8
10 U.S.C. § 275.....	3
18 U.S.C. § 1385.....	2, 8, 9
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<i>About the Guard: How We Began</i> , NATIONAL GUARD, <a href="https://www.nationalguard.mil/About-the-Guard/How-We-Began">https://www.nationalguard.mil/About-the-Guard/How-We-Began</a> .....	2
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<i>Bragg Soldiers Who Cheered Trump's Political Attacks While in Uniform Were Checked for Allegiance, Appearance</i> , MILITARY.COM (June 11, 2025), <a href="https://www.military.com/daily-news/2025/06/11/bragg-soldiers-who-cheered-trumps-political-attacks-while-uniform-were-checked-allegiance-appearance.html">https://www.military.com/daily-news/2025/06/11/bragg-soldiers-who-cheered-trumps-political-attacks-while-uniform-were-checked-allegiance-appearance.html</a> .....	22
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<i>Gov. Henry McMaster Authorizes Deployment of National Guard to Washington, D.C.</i> , S.C. OFFICE OF THE GOVERNOR (Aug. 16, 2025), .....	12

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<i>Hegseth Authorizes National Guard Troops in D.C. to Carry Weapons</i> , NBC NEWS (Aug. 22, 2025), <a href="https://www.nbcnews.com/news/us-news/hegseth-authorizes-national-guard-troops-dc-carry-weapons-rcna226536">https://www.nbcnews.com/news/us-news/hegseth-authorizes-national-guard-troops-dc-carry-weapons-rcna226536</a> .....	15
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## Rules

Fed. R. App. P. 29 .....	1
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### INTEREST OF *AMICI CURIAE*<sup>1</sup>

*Amici* are former secretaries of the Army and Navy and retired four-star admirals and generals. Collectively, they served under each president from John F. Kennedy to Barack Obama.

*Amici* are acutely interested in this case because presidential deployment of the National Guard to perform local law enforcement should be a rare and carefully considered occurrence that strictly complies with the Posse Comitatus Act. Domestic deployments that fail to adhere to these long-established guardrails threaten the Guard's core national security and disaster relief missions; place deployed personnel in fraught situations for which they lack specific training, thus posing safety concerns for servicemembers and the public alike; and risk inappropriately politicizing the military, creating additional risks to recruitment, retention, morale, and cohesion of the force.

This submission is based on *amici*'s collective experience serving in and leading our military, their direct experience commanding active-duty service personnel, and their interest in preserving our military's apolitical role in safeguarding national security.

*Amici* are **Admiral Steve Abbot, United States Navy (Retired); Admiral Thad Allen, United States Coast Guard (Retired); Former Secretary of the Army Louis Caldera; General George Casey, United States Army (Retired); General Michael Hayden, United States Air Force (Retired); Admiral Samuel Jones Locklear, III, United States Navy (Retired); General Craig McKinley, United States Air Force (Retired); Former Secretary of the Navy Sean O'Keefe; Admiral Bill Owens, United States Navy (Retired).** *Amici*'s short biographies, which are included in the accompanying Appendix, capture a measure of their distinguished service to

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<sup>1</sup> Pursuant to Federal Rule of Appellate Procedure 29(a)(2), all parties have consented to the filing of this brief. Pursuant to Rule 29(a)(4)(E), counsel for *amici curiae* certify that no counsel for a party authored this brief in whole or in part, and no person other than *amici* or their counsel made a monetary contribution to the brief's preparation or submission.



our country, as well as their expertise on matters encompassing the mission of the National Guard and armed services and the well-being of all those who serve in uniform.

## INTRODUCTION

The National Guard, founded in 1636 as a citizen-soldier force, has a dual mission: (1) to serve as a reserve component of the active-duty military, and (2) to protect life and property within communities at home.<sup>2</sup> In the Guard's long and proud history, its members have fought in nearly every U.S. conflict since the Revolutionary War and saved countless lives in major domestic disaster responses – indeed, thousands of members of the Guard are deployed abroad on any given day.<sup>3</sup>

Another tradition older than the United States itself is the strong aversion to military personnel under control of the national government engaging in local law enforcement. This prohibition was codified by Congress in 1878 in the Posse Comitatus Act,<sup>4</sup> 18 U.S.C. § 1385, and has continued as a bedrock of American federalism and civil-military relations ever since. While there are important exceptions for extraordinary circumstances, the Act reflects the straightforward and heretofore noncontroversial expectation that the President will not use the American military to police America. One of the extraordinary circumstances supporting an exception to this prohibition is an internal rebellion justifying invocation of the Insurrection Act. Federal law also recognizes that states and territories may authorize National Guard under their control to support

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<sup>2</sup> See *About the Guard: How We Began*, NATIONAL GUARD, <https://www.nationalguard.mil/About-the-Guard/How-We-Began> (last visited Sept. 26, 2025) ; *Our History*, ARMY NATIONAL GUARD (2025), <https://nationalguard.com/guard-history>.

<sup>3</sup> See generally Michael D. Doubler, *I Am The Guard: A History of The Army National Guard, 1636-2000* (2001), <https://www.nationalguard.mil/portals/31/Documents/About/Publications/Documents/I%20am%20the%20Guard.pdf>.

<sup>4</sup> Specifically, the Posse Comitatus Act prohibits federal military personnel from acting as a domestic police force unless doing so is “expressly authorized by the Constitution or Act of Congress.” 18 U.S.C. § 1385.

local law enforcement within their own communities. Notwithstanding these limited exceptions, strict adherence to this principle – that military personnel operating at the direction of the President and his subordinates may not engage in domestic law enforcement – has been a touchstone of Republican and Democratic administrations alike.

Our experience as military leaders has taught us that this commitment keeps our military stronger and our communities safer. Any domestic deployment that fails to comply with the foundational principles of the Posse Comitatus Act and similar authorities<sup>5</sup> poses multiple risks to the core mission of the Guard, the well-being of the troops, and the safety of the communities they are committed to protect. *First*, deploying military personnel in the context of domestic law enforcement diverts them from their primary mission, which is to train and to be ready to fight and win the nation’s wars and protect communities after disasters. Accordingly, such assignments come at the expense of local, state, and national safety, as well as troop morale. *Second*, active-duty National Guard personnel are neither intended nor specifically trained to conduct domestic law enforcement operations. This poses a danger to the safety of both the troops and the public. *Third*, use of federal military personnel in the context of law enforcement operations should be a last resort to avoid the politicization of the military, which inevitably erodes public trust, hurts recruitment, and undermines troop morale. Peaceful protests of government actions are constitutionally protected political speech deserving of the highest protection, not intimidation by the military.

*Amici* submit this brief to more fully explain these risks and assist the Court in its disposition of the pending motion.

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<sup>5</sup> For example, 10 U.S.C. § 275, which restricts the direct participation of military personnel in activities like searches, seizures, and arrests, with exceptions requiring authorization by law or regulation.

## FACTUAL BACKGROUND

The summer and early fall of 2025 have witnessed stark deviations from the traditional roles of the National Guard. Beginning on June 7, 2025, following protests at ICE facilities in Los Angeles, President Trump issued orders federalizing and deploying the California National Guard in southern California over the objections of California's governor. Underscoring the aberrational nature of that deployment, a federal court has since found that the actions the troops were ordered to undertake in California violated the Posse Comitatus Act.<sup>6</sup> Notably, that deployment was pursuant to a Memorandum that President Trump issued that broadly authorized the federalization of National Guard service members under 10 U.S.C. § 12406 that did not refer to any specific location, instead issuing a blanket geographic authorization of Guard troops at locations "where protests against [Federal] functions [were] occurring or are likely to occur."<sup>7</sup>

Continuing this recent – and concerning – nationwide trend, on August 11, 2025, President Trump declared a crime emergency in Washington, D.C., and began to deploy to the District the D.C. National Guard as well as Guard troops from eight cooperating states. As in California, the local authorities – in D.C., the Mayor – neither requested nor agreed to these deployments. Unlike in the California litigation, in D.C. the Administration did not dispute that law enforcement was a central purpose of the Guard's deployment there. Rather, the President and other federal officials expressly described the mission as designed in part to address crime.<sup>8</sup>

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<sup>6</sup> See *Newsom v. Trump*, 786 F. Supp. 3d 1235, 1242–43 (N.D. Cal. 2025), *stayed pending appeal*, 141 F.4th 1032 (9th Cir. 2025).

<sup>7</sup> Memorandum from President Donald J. Trump to Attorney General Pam Bondi and Secretary of Homeland Security Kristi Noem, *Department of Defense Security for the Protection of Department of Homeland Security Functions*, WHITE HOUSE (June 7, 2025), [www.whitehouse.gov/presidential-actions/2025/06/department-of-defense-security-for-the-protection-of-department-of-homeland-security-functions/](https://www.whitehouse.gov/presidential-actions/2025/06/department-of-defense-security-for-the-protection-of-department-of-homeland-security-functions/).

<sup>8</sup> Exec. Order No. 14339, 90 Fed. Reg. 42121 (Aug. 28, 2025).

The next city to receive a deployment of National Guard troops was Memphis, Tennessee, as President Trump announced on Friday, September 12 that he would begin sending National Guard troops into Tennessee's second largest city for the stated purpose of addressing crime in the city, "just like we did" in Washington, D.C.<sup>9</sup> Indeed, similar to the circumstances in Washington, D.C., Memphis's mayor did not agree to the deployment of troops.<sup>10</sup> The trend continued on September 27, 2025, when President Trump posted on social media that he would send troops to "War ravaged Portland," authorizing "Full Force, if necessary."<sup>11</sup> On September 28, 2025, Secretary Hegseth issued a memo authorizing the federalization and deployment of 2000 members of the Oregon National Guard.<sup>12</sup> Again, this deployment was over the objection of the governor of Oregon.<sup>13</sup>

Against this backdrop, on September 5, 2025, President Trump signed an order renaming the Department of Defense the Department of War. The order purports to "sharpen[] the

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<sup>9</sup> Jonathan Mattise, *Trump says he'll send National Guard to Memphis, escalating his use of troops in US cities*, ASSOCIATED PRESS (Sept. 12, 2025), <https://apnews.com/article/trump-memphis-national-guard-federal-intervention-73a7747f02bdf111574cbe9cc59201dd>.

<sup>10</sup> The mayor of Memphis commented that, while federal support to reduce crime would be welcome, such support "shouldn't come in the form of military personnel, people carrying semi-automatic weapons and driving around in armored vehicles." Kayla Solomon, *Mayor Harris, Mayor Young comment on possible National Guard deployment*, FOX13 (Sept. 11, 2025), [https://www.fox13memphis.com/news/mayor-harris-mayor-young-comment-on-possible-national-guard-deployment/article\\_bbba041f-c016-441f-99bc-314a0dca02c0.html](https://www.fox13memphis.com/news/mayor-harris-mayor-young-comment-on-possible-national-guard-deployment/article_bbba041f-c016-441f-99bc-314a0dca02c0.html).

<sup>11</sup> Michelle Wiley, *From passing mention to authorized deployment: A timeline of the president's pressure on Portland*, OPB (Sept. 29, 2025), <https://www.opb.org/article/2025/09/29/timeline-donald-trump-pressure-portland/>.

<sup>12</sup> Memorandum from Secretary of War Pete Hegseth to the Adjutant General, Oregon National Guard through: The Governor of Oregon, *Calling Members of the Oregon National Guard into Federal Service*, DEPARTMENT OF WAR (Sept. 28, 2025), <https://www.documentcloud.org/documents/26159492-hegsethmemosept282025/>.

<sup>13</sup> Opinion at 14, *Oregon v. Trump*, No. 3:25-cv-1756, (D. Or. Oct. 4, 2025), ECF No. 56, [https://storage.courtlistener.com/recap/gov.uscourts.ord.189270/gov.uscourts.ord.189270.56.0\\_1.pdf](https://storage.courtlistener.com/recap/gov.uscourts.ord.189270/gov.uscourts.ord.189270.56.0_1.pdf).

Department's focus on [] our adversaries' focus on our willingness and availability to wage war to secure what is ours.”<sup>14</sup> Aligning with a transformation in American civil-military relations toward widespread domestic peacetime deployment of the military, the President has also ordered the Department to “ensure the availability of a standing National Guard quick reaction force that shall be resourced, trained, and available for rapid nationwide deployment.”<sup>15</sup>

Consistent with an increasingly aggressive posture, President Trump has promised to deploy the National Guard to police more American cities: “We’re going to take care of all of them step by step, just like we did in D.C.”<sup>16</sup> These public pronouncements sometimes name specific cities as future targets for military deployment, including Chicago, Baltimore, New Orleans, and St. Louis.<sup>17</sup> On September 6, 2025, President Trump posted on social media that Chicago was “about to find out why it’s called the Department of WAR.”<sup>18</sup>

On October 4, 2025 the Administration followed through on that threat. Secretary Hegseth invoked 10 U.S.C. § 12406 to federalize up to 300 members of the Illinois National Guard, over the objection of the governor of Illinois. The following day, on October 5, Secretary Hegseth invoked the same statute to federalize up to 400 additional National Guard troops – this time from Texas – to deploy into Chicago.

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<sup>14</sup> Exec. Order No. 14347, 90 Fed. Reg. 43893 (Sept. 5, 2025).

<sup>15</sup> Exec. Order No. 14339, *supra* note 8.

<sup>16</sup> Luke Broadwater & Emily Cochrane, *Trump Signs Off on Sending the National Guard to Memphis*, N.Y. TIMES (Sept. 15, 2025), <https://www.nytimes.com/2025/09/15/us/politics/trump-memphis-national-guard-crime.html>.

<sup>17</sup> Rachel Treisman, *How Chicago, Baltimore and New Orleans are reacting to Trump's National Guard threats*, NPR (Sept. 5, 2025), <https://www.npr.org/2025/09/05/nx-s1-5530051/trump-national-guard-chicago-baltimore-new-orleans>; Broadwater & Cochrane, *supra* note 16.

<sup>18</sup> Joe Hernandez & Kat Lonsdorf, *Trump walks back Chicago 'war' threat, but vows to 'clean up' cities*, NPR (Sept. 7, 2025), <https://www.npr.org/2025/09/07/nx-s1-5533191/trump-chicago-threat-baltimore-new-orleans>.

Over the short period of only the past several months, the Administration has abandoned the American tradition against domestic deployment of the military, embracing instead what the District Court of Oregon described as “martial law.”<sup>19</sup> The Administration has suggested it plans to use United States cities as “training grounds” for the military, turning our troops on the “enemy within”<sup>20</sup> – the very people they have proudly sworn to protect, with their own lives if necessary. Thousands of troops have been deployed in at least five such communities over the objection of local leaders, with the promise of more.

## ARGUMENT

### **I. The Posse Comitatus Act Prohibits the Military from Acting as Domestic Law Enforcement Absent Express Congressional Authorization**

The general expectation that the military will not engage in domestic civilian law enforcement is foundational to American civil-military relations. Long before Congress enacted the Posse Comitatus Act in 1878, the U.S. Constitution and American tradition aimed to avoid repeating the British military’s police state-like presence in pre-Revolutionary War society. “Over the centuries, American political and military leaders ingrained in the U.S. military a nonpartisan commitment to support and defend not any person or party but the Constitution itself. This nonpartisan commitment ... mitigates against the most extreme threats to the republic, from insurrection to civil war.”<sup>21</sup> *See also, e.g.,* U.S. Const. amend. III, IV; *Laird v. Tatum*, 408 U.S. 1, 15 (1972) (discussing the “traditional and strong resistance of Americans to any military intrusion

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<sup>19</sup> Opinion at 30, *supra* note 13.

<sup>20</sup> NPR Washington Desk, *Trump defends use of the U.S. military against the 'enemy within'*, NPR (Sept. 30, 2025), <https://www.npr.org/2025/09/30/nx-s1-5557232/hegseth-generals-trump>.

<sup>21</sup> Joseph F. Dunford Jr., et al., *Guardians of the Republic: Only a Nonpartisan Military Can Protect American Democracy*, FOREIGN AFFAIRS (Jan. 5, 2023), [https://www.foreignaffairs.com/united-states/guardians-republic?check\\_logged\\_in=1&utm\\_medium=promo\\_email&utm\\_source=lo\\_flows&utm\\_campaign=article\\_link&utm\\_term=article\\_email&utm\\_content=20250916](https://www.foreignaffairs.com/united-states/guardians-republic?check_logged_in=1&utm_medium=promo_email&utm_source=lo_flows&utm_campaign=article_link&utm_term=article_email&utm_content=20250916).

into civilian affairs,” a “tradition [that] has deep roots in our history....”). This tradition was later codified in the Posse Comitatus Act, which now reads: “Whoever, except in cases and under circumstances expressly authorized by the Constitution or Act of Congress, willfully uses any part of the Army, the Navy, the Marine Corps, the Air Force, or the Space Force as a posse comitatus or otherwise to execute the laws shall be fined under this title or imprisoned not more than two years, or both.”<sup>22</sup>

Notably, the Posse Comitatus Act permits U.S. military engagement in domestic law enforcement activities when expressly authorized by an Act of Congress. This, too, is consistent with experience and tradition, as the country has at times relied on the military to lawfully intercede during periods of internal crisis or insurrection. For example, President Eisenhower federalized National Guard troops to enforce the Supreme Court’s order in *Brown v. Board of Education* to desegregate schools, wherein the Guard played a rare but critical role in upholding the Constitution. Consistent with this need, a significant exception to the Posse Comitatus Act is the Insurrection Act. When invoked, the Insurrection Act gives limited authority to the President to deploy federal troops to quell “any insurrection, domestic violence, unlawful combination, or conspiracy against the United States government and to execute federal civil rights laws when they are obstructed.”<sup>23</sup> That authority has been used sparingly throughout this country’s history, and rightfully so in a democracy governed by civilians elected by the American people.

Significantly, federalized National Guard troops under the president’s command and control are legally equivalent to active-duty military forces and therefore are subject to the Posse

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<sup>22</sup> Posse Comitatus Act, 18 U.S.C. § 1385.

<sup>23</sup> 10 U.S.C. § 253. For background on the Insurrection Act, *see generally* Elizabeth Goitein, “*The Insurrection Act*” by *Any Other Name: Unpacking Trump’s Memorandum Authorizing Domestic Deployment of the Military*, JUST SECURITY (June 10, 2025), <https://www.justsecurity.org/114282/memorandum-national-guard-los-angeles/>.

Comitatus Act. In the rare cases where a president lawfully invoked the Insurrection Act to address civil unrest, the condition of the Posse Comitatus Act that activities be “expressly authorized by ...[an] Act of Congress” was satisfied.<sup>24</sup> This was the case, for instance, when President George H.W. Bush invoked the Insurrection Act and federalized Guard troops—upon California Governor Pete Wilson’s request—to quell the widespread Los Angeles riots in 1992.

Significantly, however, President Trump has not invoked the Insurrection Act or other comparable statutory authority in relation to the events that underlie this lawsuit. As such, the conduct of any federalized National Guard troops deployed in Illinois should conform to the prohibitions on civilian law enforcement activities set forth in the Posse Comitatus Act. Indeed, “the military has a long-standing practice of avoiding involvement in civilian affairs which it believes are contrary to the [Posse Comitatus] act.”<sup>25</sup> As discussed further *infra*, several important civil-military values reinforce the guardrails imposed by the Posse Comitatus Act and should inform any federal domestic military deployment.

## **II. The Posse Comitatus Act Permits Non-Law-Enforcement Uses of Military Personnel for National Security and Civil Support; Violations Divert Them from Their Primary Mission**

The National Guard is unique within the U.S. military as a dual-status force with state *and* federal responsibilities, allowing it to be activated under the authority of either state or federal leadership, pursuant to strict legal limitations. The Guard plays a critical role in protecting national security as the primary combat reserve of the U.S. Army and U.S. Air Force. Within the United States, the Guard primarily provides domestic civil support, natural disaster relief, border security,

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<sup>24</sup> 18 U.S.C. § 1385.

<sup>25</sup> Jennifer K. Elsea, CONG. RSCH. SERV., R42659, *The Posse Comitatus Act and Related Matters: The Use of the Military to Execute Civilian Law* (2018) (citations omitted), <https://www.congress.gov/crs-product/R42659>.



election support, and other support as requested by governors and/or the President. In rare times of civil unrest, the Guard has been called to provide law enforcement support, but almost always under the direction of the relevant governor—not the President. With limited exceptions, the Posse Comitatus Act prohibits the National Guard from engaging in domestic law enforcement while in federalized status.

According to the National Guard Association of the United States, “[t]he National Guard are a critical component of disaster response across the nation, with members trained to use military expertise and equipment [to] provide fast and effective emergency support in severe weather events such as hurricanes and wildfires, and to conduct search and rescue operations.”<sup>26</sup> Each state’s national guard is vital to its disaster preparedness and emergency response needs. To do this work effectively, the Guard relies on the trust of the local communities they serve. In each state, the Guard is called upon for innumerable tasks requiring the cooperation and trust of the community, including rescuing stranded families from floodwaters, airlifting individuals from remote locations, providing medical services to communities in dire situations, and training local first responders.<sup>27</sup> This work is put at risk when the Guard is called into politically charged situations that those in the local community may perceive as partisan.<sup>28</sup> For example, in Illinois, the mayor of Broadview (the location of Illinois’ sole ICE processing facility, where the Guard

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<sup>26</sup> Zita Fletcher, *Texas Guardsmen Rescue Over 520 Flood Victims*, THE NATIONAL GUARD ASSOCIATION OF THE UNITED STATES (July 8, 2025), <https://www.ngaus.org/newsroom/texas-guardsmen-rescue-over-520-flood-victims>.

<sup>27</sup> *The National Guard: Strengthening Local Communities Through Service and Support*, AFBA (Apr. 8, 2024), <https://www.afba.com/uniformed-services-news/national-guard/the-national-guard-strengthening-local-communities-through-service-and-support/>.

<sup>28</sup> Christopher Purdy, *Opinion: What we lose by distorting the mission of the National Guard*, ANCHORAGE DAILY NEWS (Sept. 5, 2025), <https://www.adn.com/opinions/national-opinions/2025/09/05/opinion-what-we-lose-by-distorting-the-mission-of-the-national-guard/#:~:text=The%20National%20Guard%20has%20become,and%20letters%20to%20the%20editor.>

may be ordered pursuant to the orders challenged in this case) has accused federal agents of “making war on [her] community.”<sup>29</sup> According to the mayor, federal agents have been “endangering Broadview neighbors, police officers and firefighters with their ‘relentless’ use of tear gas, pepper spray and rubber bullets against protesters[.]”<sup>30</sup> Even the perception that the National Guard is being deployed into an environment in which it is associated with endangerment of the local communities it is designed to protect risks the Guard’s ability to effectively deploy in these same neighborhoods in future events of natural disaster, pandemic, or other crises requiring their aid.

Another risk is that the deployment of National Guard troops for these efforts diverts them from their primary mission. As noted above, active troops who are not protecting our national security overseas are providing critical support to local communities. For instance, when the Administration federalized members of the California National Guard for federal deployment in the Los Angeles area, they were diverted from wildfire protection, leaving the specialized fire protection unit at just 40% of its normal strength during peak wildfire season.<sup>31</sup> Similarly, as part of the D.C. Guard deployment, South Carolina sent Guardsmen to D.C. during hurricane season in South Carolina. Discussing this decision, South Carolina’s governor stated that “should a hurricane or natural disaster threaten our state, these men and women can and will be immediately

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<sup>29</sup> Kelly Bauer & Colin Boyle, *ICE Is ‘Making War’ On Broadview — And It Must Stop*, *Suburban Mayor Says*, BLOCK CLUB CHICAGO (Sept. 26, 2025), <https://blockclubchicago.org/2025/09/26/ice-is-making-war-on-broadview-and-it-must-stop-suburban-mayor-says/>.

<sup>30</sup> *Id.*

<sup>31</sup> Andre de Channes, *National Guard Diversion to Los Angeles Weakens California's Wildfire Defenses*, MENDOCINO COUNTY PUBLIC BROADCASTING (July 7, 2025), <https://www.kzyx.org/2025-07-07/national-guard-diversion-to-los-angeles-weakens-californias-wildfire-defenses>.

recalled home to respond.”<sup>32</sup> But the governor’s statement elides the likely operational difficulties of recalling hundreds of deployed troops and diverting them to a disaster zone, not to mention the risk of burnout among service members immediately recalled from one mission to another. Ultimately, in any state, the diversion of Guard personnel during critical times risks degrading capacity and preparedness to protect local populations during emergencies.

Finally, the proliferation of domestic deployments of the National Guard for missions outside of their core duties threatens the health of the military itself in several respects. First, it threatens the long-term readiness of the Guard and the U.S. military. Non-emergency deployments – especially lengthy or back-to-back deployments – reduce combat preparedness by cutting into training time and contributing to fatigue and burnout. As Iraq War veteran and former Army National Guard member Christopher Purdy put it, “For three decades, Guardsmen have rotated through seemingly never-ending deployments to Kosovo, Iraq, Afghanistan, Syria, Ukraine, and the Horn of Africa. Adding domestic-policing duties to the list of responsibilities degrades the Guard’s readiness for missions that only the armed forces can perform.”<sup>33</sup>

Second, excessive or inappropriate deployments can seriously degrade morale and exacerbate retention and recruitment challenges within the National Guard. For example, a National Guard recruiter from a state that deployed troops to D.C. has reportedly stated that the D.C. mission “has deterred potential recruits and pushed already disillusioned soldiers to their breaking points.”<sup>34</sup> Regarding the Guard deployment in Washington, D.C., a National Guard

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<sup>32</sup> Gov. Henry McMaster Authorizes Deployment of National Guard to Washington, D.C., S.C. OFFICE OF THE GOVERNOR (Aug. 16, 2025), <https://governor.sc.gov/news/2025-08/gov-henry-mcmaster-authorizes-deployment-national-guard-washington-dc>.

<sup>33</sup> Purdy, *supra* note 28.

<sup>34</sup> Schuyler Mitchell, *The National Guard Soldier Pissed About Trump’s DC Takeover*, MOTHER JONES (Sept. 3, 2025), <https://www.motherjones.com/politics/2025/09/national-guard-morale-dc-takeover-interview-soldiers-pissed-angry/>.

Public Affairs document highlighted “[m]entions of [f]atigue, confusion, and demoralization” among the troops deployed there, citing concerns that they are “just gardening,” have an “unclear mission,” and are driving a “wedge between citizens and the military.”<sup>35</sup> Across the Guard, members have civilian lives – many have families, civilian jobs – that they put on hold when deployed. While all Guard members expect this sacrifice for their service, the toll this takes can be exacerbated by frequent, months-long absences on politically controversial missions, especially those for which the very need for their service may be in question. For instance, in Illinois, the Adjutant General of the Illinois National Guard, General Rodney C. Boyd, has expressly stated “There is no public safety need or other emergency requiring the National Guard....”<sup>36</sup> Morale is further at risk as the members of the Guard now being deployed “are not being paid during the government shutdown, creating financial hardships for their families.”<sup>37</sup>

Especially as the Administration has publicized its intention to deploy the National Guard in cities throughout the country and to model future deployments after the D.C. deployments,<sup>38</sup> *amici* are concerned that one effect may be the erosion of the Guard’s readiness for the primary purposes for which it was built: as combat reserve forces to protect national security, and within each state, ready to respond to the needs of local communities.

### **III. National Guard Personnel Are Not Sufficiently Trained to Operate in the Context of Domestic Law Enforcement**

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<sup>35</sup> Alex Horton, *National Guard documents show public ‘fear,’ veterans’ ‘shame’ over D.C. presence*, WASHINGTON POST (Sept. 10, 2025), <https://www.washingtonpost.com/national-security/2025/09/10/national-guard-trump-dc/>.

<sup>36</sup> Complaint ¶ 129, *Ill. v. Trump*, No. 1:25-cv-12174 (N.D. Ill. Oct. 6, 2025), ECF No. 1.

<sup>37</sup> Mark Richardson, *National Guard members supporting ICE operations working without pay during government shutdown*, LIVENOW FOX (Oct. 3, 2025), <https://www.livenowfox.com/news/national-guard-members-work-without-pay-government-shutdown>.

<sup>38</sup> Broadwater & Cochrane, *supra* note 16.

Military missions and law enforcement missions are distinct undertakings requiring different skill sets, training, and rules. As a general matter, “[w]hile an LEO [law enforcement officer] is obliged to begin with an attempt at a constitutional arrest and escalate to force as necessary, a combatant may strike an enemy first and resort to lesser measures, like arrest, as the situation requires.”<sup>39</sup> Consistent with these distinct roles, National Guard personnel typically receive limited instruction and training on how to handle civil disturbances. The minimal training they receive pales in comparison to the in-depth and ongoing education provided to civilian law enforcement officers. Domestic law enforcement—particularly in emotionally charged situations and instances of civil unrest—requires a specific skill set for which law enforcement officers train extensively and continually, including training in de-escalation and in respecting civilians’ constitutional rights on U.S. soil. As described in the recent Opinion and Order in the District Court of Oregon, military personnel lack that training. Opinion at 5, *supra* note 13 (“Members of the National Guard generally do not receive training to perform local law enforcement tasks, such as learning de-escalation techniques, the use of non-lethal force, or how to properly conduct criminal investigations.”). *See also Bissonette v. Haig*, 776 F.2d 1384, 1387 (8th Cir. 1985) (“[M]ilitary enforcement of the civil law leaves the protection of vital Fourth and Fifth Amendment rights in the hands of persons who are not trained to uphold these rights.”), *aff’d on reh’g en banc*, 800 F.2d 812 (8th Cir. 1986), *aff’d*, 485 U.S. 264 (1988); *United States v. McArthur*, 419 F. Supp. 186, 193–94 (D.N.D. 1975) (“It is the nature of their primary mission that military personnel must be trained to operate under circumstances where the protection of constitutional freedoms cannot receive the consideration needed in order to assure their preservation. The posse

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<sup>39</sup> Joseph Hope, *GOOD TOOL, WRONG TASK: ARMED FORCES IN LAW ENFORCEMENT OPERATIONS*, WAR ROOM (July 17, 2018), <https://warroom.armywarcollege.edu/articles/armed-forces-in-law-enforcement/>.

comitatus statute is intended to meet that danger.”), *aff’d sub nom. United States v. Casper*, 541 F.2d 1275 (8th Cir. 1976). Our longstanding tradition of entrusting domestic law enforcement to local, state, and federal police has allowed the U.S. military to remain focused on its core mission.

*Amici* are concerned that any troops in this deployment tasked with activities relating to law enforcement are not set up for success, with potentially grave risks of escalation or confusion given their lack of experience with domestic law enforcement. *See, e.g., United States v. Red Feather*, 392 F. Supp. 916, 925 (D.S.D. 1975) (“Activities which constitute an active role in direct law enforcement are: arrest; seizure of evidence; search of a person; search of a building; investigation of crime; interviewing witnesses; pursuit of an escaped civilian prisoner; search of an area for a suspect and other like activities.”). Indeed, few Guard members have had more than cursory law enforcement training, inviting confusion and disagreement over what constitutes appropriate conduct in contentious civilian situations and risking miscalculations in the heat of the moment.<sup>40</sup> Nonetheless, Secretary Hegseth signed an order authorizing the Guard members deployed to Washington, D.C. to carry weapons as part of their mission.<sup>41</sup> As the President has pledged to model future deployments using D.C. as an example, *amici* are concerned that these same actions repeated elsewhere, including in Illinois, could put both the troops and the public they are sworn to protect at risk, as the weapons training received by the Guard is not applicable to patrolling American streets in peacetime.

These differences could lead to deadly consequences. For example, in a joint operation between the Los Angeles Police Department and the Marines during the 1992 Los Angeles riots,

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<sup>40</sup> *See, e.g.,* Greg Jaffe, *Hegseth Authorizes Troops in D.C. to Carry Weapons*, N.Y. TIMES (Aug. 22, 2025), <https://www.nytimes.com/2025/08/22/us/politics/national-guard-weapons.html#:~:text=Mr.,Pentagon%20and%20the%20U.S.%20military>.

<sup>41</sup> Mosheh Gains & Daniel Arkin, *Hegseth Authorizes National Guard Troops in D.C. to Carry Weapons*, NBC NEWS (Aug. 22, 2025), <https://www.nbcnews.com/news/us-news/hegseth-authorizes-national-guard-troops-dc-carry-weapons-rcna226536>.

a police officer asked fellow Marines to “cover me,” intending for the Marines to be prepared to fire to protect him *only if necessary*. The Marines, however, understood the request in military parlance and fired over one hundred rounds into a civilian’s house.<sup>42</sup> These seemingly small details can be the difference between life and death for soldiers, law enforcement officers, and the people they are sworn to protect, and underscore the importance of maintaining a separation between military operations and domestic law enforcement. More recently, on August 20, 2025, a sixteen-ton National Guard Mine-Resistant Ambush Protected All-Terrain Vehicle (MATV) driving through downtown Washington D.C. in a five-vehicle convoy reportedly crashed into a car, injuring the civilian driver and causing him to be hospitalized.<sup>43</sup> Public reporting from Illinois suggests that federal agents are already employing Black Hawk helicopters, tear gas, and flash bang grenades in their law enforcement operations in Illinois.<sup>44</sup> *Amici* are concerned that the addition of the military to such an environment would risk increasing tensions and the potential for the use of deadly force. At bottom, these examples underscore the importance of adhering to the foundational principle that the military should be kept out of civilian law enforcement whenever possible.

#### **IV. To Avoid Politicization of the Military, Deploying Military Personnel to Assist with Law Enforcement Should Be a Last Resort**

A bedrock principle of American democracy is that our military is apolitical. That is, the military should be used to accomplish military objectives and not to advance any administration’s

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<sup>42</sup> Susan Rosegrant, *The Flawed Emergency Response to the 1992 Los Angeles Riots (A)*, KENNEDY SCH. OF GOV’T CASE PROGRAM (Sept. 1, 2000), <https://case.hks.harvard.edu/the-flawed-emergency-response-to-the-1992-los-angeles-riots-a/>.

<sup>43</sup> Luke Garrett, *One Civilian injured in crash with D.C. National Guard military vehicle*, NPR (Aug. 20, 2025), <https://www.npr.org/2025/08/20/g-s1-83950/national-guard-dc-crash>.

<sup>44</sup> *Helicopters, tear gas, blown doors: A look at recent scenes in Chicago*, NBC CHICAGO (Oct. 6, 2025), <https://www.nbcchicago.com/news/local/helicopters-tear-gas-blown-doors-a-look-at-recent-scenes-in-chicago/3834233/>.

domestic political agenda. This principle is enshrined throughout U.S. law and policy, and in the legislative and judicial history of the Posse Comitatus Act, which Congress passed in 1878 to restore the traditional separation between the federal military and civilian authorities in domestic affairs that had come undone during the Civil War and politically turbulent Reconstruction era. *See United States v. Allred*, 867 F.2d 856, 870 (5th Cir. 1989) (explaining that the “legislative and judicial history of the Act . . . indicates that its purpose springs from an attempt to end the use of federal troops to police state elections in ex-Confederate states”). Efforts to establish new governments in ex-Confederate states were particularly contentious during the decade following the Civil War, with presidents receiving more requests for military aid from state governors in those years than all previous decades combined, and sometimes even receiving simultaneous requests from two rival governors from different political parties claiming legitimacy in the same state after an election. Courts and military scholars alike have recognized the American tradition and practical need to keep the military apolitical. *See, e.g., Greer v. Spock*, 424 U.S. 828, 839 (1976) (upholding military regulation prohibiting partisan political activity and recognizing the need for the military to be “insulated from both the reality and the appearance of acting as a handmaiden for partisan political causes or candidates”). As the Supreme Court has observed, a “politically neutral military” is an “American constitutional tradition” and has been “reflected in numerous laws and military regulations throughout our history.” *Id.*

Accordingly, U.S. military personnel are not permitted to engage in political conduct while on duty or to use their military status to endorse political candidates or political causes.<sup>45</sup> Irrespective as to whether any particular conduct is judged lawful or unlawful, any attempts to circumvent these laws and the underlying principles for political purposes detracts from the

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<sup>45</sup> *Directive 1344.10, Political Activities By Members of the Armed Forces*, U.S. DEP’T OF DEF., at 3 (Feb. 19, 2008), <https://www.fvap.gov/uploads/FVAP/Policies/doddirective134410.pdf>.



military's focus on real external threats and jeopardizes the standing of the military in the eyes of the American people. For instance, while a president may lawfully fire multiple senior ranking military officials without cause or explanation to replace them with loyalists—including the Chairman of the Joint Chiefs of Staff, three of five service chiefs, the heads of the National Security Agency and Defense Intelligence Agency, and all three service Staff Judge Advocates—this form of politicization of the military does not enhance national security.<sup>46</sup> The country relies on informed, experienced leadership committed first and foremost to providing professional military advice, rather than maintaining the favor of a president. Military leaders are duty-bound to provide nonpartisan counsel “and, if required, include advice contrary to what politicians want to hear or that goes against current policy. The information should include an explanation of what the military operations will entail, the military objectives, the number of personnel and equipment required for mission success, and the limitations of such actions.”<sup>47</sup>

One of the “core principles and best practices” of “healthy American civil-military relations” is that “[m]ilitary officers swear an oath to support and defend the Constitution, not an oath of fealty to an individual or to an office.”<sup>48</sup> If an officer is afraid to speak the truth out for fear of the consequences for not wholeheartedly embracing a president's preferred course of action—or has been installed because he or she is known to be predisposed to defer to the president—then military and national security decisions will not be based on a full understanding of the facts

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<sup>46</sup> Dave Barno & Nora Bensahel, *Rough Seas Ahead: Steering the Military Profession*, WAR ON THE ROCKS (Mar. 4, 2025), <https://warontherocks.com/2025/03/rough-seas-ahead-steering-the-military-profession/>.

<sup>47</sup> Patrick Paterson, *Civil-Military Relations: Guidelines in Politically Charged Societies*, in 52 PARAMETERS 5, 7-8 (Mar. 3, 2022), <https://press.armywarcollege.edu/cgi/viewcontent.cgi?article=3126&context=parameters>.

<sup>48</sup> *To Support and Defend: Principles of Civilian Control and Best Practices of Civil-Military Relations*, WAR ON THE ROCKS (Sept. 6, 2022) <https://warontherocks.com/2022/09/to-support-and-defend-principles-of-civilian-control-and-best-practices-of-civil-military-relations/>.

needed to keep America safe. For instance, “if senior military leaders whose first loyalty was to the person who appointed them were put to tests such as the 2020 election, the republic could indeed be at risk.”<sup>49</sup> *Amici* fear such a risk may already be materializing. For example, during the recent deployments in California, when Major General Sherman (commander of the troops deployed to California) expressed concern about a risky plan for an operation because of the likelihood of escalation, Border Patrol Chief Bovino accused him of being insufficiently loyal to the country.<sup>50</sup>

Also critical to the military’s ability to carry out its core functions is retaining the public’s respect and maintaining cohesion and unity within its ranks—regardless of the political leanings of individual citizens or soldiers. Since Reconstruction, an apolitical military has served administrations of both political parties, maintaining continuity of service and security even as the White House changed parties back and forth. Even the perception that the military welcomes only one political point of view can be damaging to recruitment, as it automatically shrinks the pool of potential recruits by over half; this is of special concern to a military that relies on an all-volunteer force.

Caution is therefore necessary if the U.S. military is to be deployed domestically in the context of a politically charged situation. It is essential that such deployments be a *last* resort, especially in the context of constitutionally protected activities or activities likely to be perceived as partisan intimidation tactics. For example, members of the military were ordered to accompany federal agents on an operation in MacArthur Park in Los Angeles, for the apparent purpose of demonstrating “a show of presence.”<sup>51</sup> According to the troops’ own planning documents, they

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<sup>49</sup> Dunford, Jr., et al., *supra* note 21.

<sup>50</sup> *Newsom v. Trump*, No. 25-CV-04870-CRB, 2025 WL 2501619, at \*7 n.4 (N.D. Cal. Sept. 2, 2025).

<sup>51</sup> *Id.* at \*7.

judged the risk of *not* conducting the operation as low and hypothetical, and the risks of conducting the operation as high.<sup>52</sup> Notwithstanding this risk assessment, the troops were ordered to proceed with the operation to achieve the mission of displaying federal capacity to the civilian population. The administration’s violations of the Posse Comitatus Act were found to be “part of a top-down, systemic effort,” establishing a playbook for similar efforts in the future. Indeed, reporting indicates that similar missions may be taking place already in Chicago that, if service members are deployed alongside federal agents on these missions, could also be perceived as entanglement with a partisan undertaking.<sup>53</sup> *Amici* are concerned that service members deployed on these and similar missions – for instance, Border Patrol Chief Bovino’s fleet of boats on the downtown Chicago River, with officers armed with semi-automatic rifles<sup>54</sup>, or the use of tear gas on unarmed reporters and protesters<sup>55</sup> – could embroil the military in a politically charged situation and risk the trust of all Americans in the neutrality of the Guard and the military writ large.

In line with the need to avoid politicizing the military, federal deployments on U.S. soil have historically been rare—reserved for the most serious situations and only with clear legal justification.<sup>56</sup> Prior to the recent deployment in Southern California that a federal district court

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<sup>52</sup> *Id.*

<sup>53</sup> *Id.* at \*24.

<sup>54</sup> Mohammad Samra, et al., *Border Patrol spotted with guns on Chicago River in Trump's latest deportation push*, CHICAGO SUN-TIMES (Sept. 26, 2025), <https://chicago.suntimes.com/immigration/2025/09/25/border-patrol-chicago-river-immigration-enforcement-greg-bovino-deportation>.

<sup>55</sup> Siri Chilukuri, *Body slamming, teargas and pepper balls: viral videos show Ice using extreme force in Chicago*, THE GUARDIAN (Oct. 4, 2025), <https://www.theguardian.com/us-news/2025/oct/04/ice-chicago-extreme-force-protesters-journalists#:~:text=Local%20journalists%20have%20been%20detained,Chicago%20for%20over%2015%20years>.

<sup>56</sup> *Cf. Greer*, 424 U.S. at 845 (Powell, J., concurring) (citation omitted) (“The overriding reason for preserving this neutrality is ... ‘the lesson of ancient and modern history that the major socially destabilizing influence in many European and South American countries has been a highly politicized military.’”).

found to have violated the Posse Comitatus Act, *Newsom*, 2025 WL 2501619, at \*1, the last major domestic deployment of federal troops occurred during the 1992 Los Angeles riots. In stark contrast to the present deployment in Illinois, the 1992 deployment occurred at the request of California Governor Pete Wilson pursuant to the Insurrection Act. Further, that deployment followed dozens of civilian fatalities, the burning of entire blocks of homes and businesses, and widespread violence and looting. Notwithstanding routine crime that is troubling wherever it occurs, the situation in the Chicago area appears to be markedly different from Los Angeles in 1992. As of the filing of this brief, there have been no credible reports of widespread unrest of any kind.

Deployments over the objections of state and local officials have been even rarer, involving situations where state and local officials openly defied court orders or refused to protect citizens exercising their constitutional rights, such as when the Alabama National Guard was federalized in 1965 to protect those marching from Selma to Montgomery for civil rights. These conditions have been absent in each of the President’s Guard deployments beginning in June of 2025. Across the board, local officials in Los Angeles, Washington D.C., Memphis, Portland, and now Chicago have *not* requested National Guard assistance.<sup>57</sup> To the contrary, state and local officials in most of the affected communities – including Illinois – have suggested that the deployment of military troops would be more likely to escalate, rather than lessen, the public safety risk.<sup>58</sup> Moreover,

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<sup>57</sup> Holly Bailey & Molly Hennessy-Fiske, *Trump’s use of Guard may have lasting impact on cities and troops*, WASHINGTON POST (Oct. 6, 2025), <https://www.washingtonpost.com/nation/2025/10/06/national-guard-deployment-chicago-portland-trump/>. At a town hall, reflecting his constituents’ fears, Memphis Mayor Paul Young remarked that right now in Memphis, “[t]he National Guard ... seems to be the entity that brings the most fear and concern.” *Id.*

<sup>58</sup> Rebecca Shabad, *Mayor Muriel Bowser Says Trump’s Surge of Federal Law Enforcement Has Lowered Crime in D.C.*, NBC NEWS (Aug. 27, 2025), <https://www.nbcnews.com/politics/politics-news/bowser-trump-police-takeover-lower-dc-crime-national-guard-ice-rcna227582>; Christine Fernando, *Chicago and Illinois sue to stop Trump’s*

reports of the troops' low morale have surfaced, including discomfort with being drawn into domestic policing and concerns that much of the public view the deployments as political, unnecessarily pitting the Guard against the people they have sworn to protect.<sup>59</sup> *Amici* are concerned that the morale of troops has been and will be undermined if their sacrifices are perceived to be part of a political exercise rather than in response to a true crime emergency or operational need.<sup>60</sup>

The risks of politicization under these circumstances are profound and not speculative, especially where the President has, in his official capacity, overtly pitted the military against his professed political opponents. In a recent speech before U.S. Army personnel at Fort Bragg, President Trump repeatedly referred to the Los Angeles protests and denounced the Governor of California, while encouraging service personnel to cheer as if at a political rally.<sup>61</sup> Speaking in advance of a military parade held in observance of the Army's 250th birthday, President Trump said, "For those people that want to protest, they're going to be met with very big force."<sup>62</sup> While

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*Guard deployment plan after Portland ruling*, ASSOCIATED PRESS (Oct. 6, 2025),

<https://apnews.com/article/national-guard-portland-chicago-trump-a35549dc8d198b0270eaa95e5230ba94> ("Officials in Illinois and Oregon say military intervention isn't needed and that federal involvement is inflaming the situation.").

<sup>59</sup> "'Go home,' a crowd of people chanted two weeks ago to some troops standing outside the Columbia Heights metro." Isabelle Khurshudyan, et al., *With no end in sight, National Guard troops deployed to DC grow weary*, CNN POLITICS (Sept. 4, 2025),

<https://www.cnn.com/2025/09/04/politics/national-guardsmen-deployed-to-dc-balance>.

<sup>60</sup> Ken Klippenstein (@kenklipp), THREADS (Sept. 2, 2025),

<https://www.threads.com/@kenklipp/post/DOGuxh0igjL/video-amid-morale-problems-dc-national-guard-commander-issued-a-message-of-gratitude-t>.

<sup>61</sup> Konstantin Toropin & Steve Beynon, *Bragg Soldiers Who Cheered Trump's Political Attacks While in Uniform Were Checked for Allegiance, Appearance*, MILITARY.COM (June 11, 2025), <https://www.military.com/daily-news/2025/06/11/bragg-soldiers-who-cheered-trumps-political-attacks-while-uniform-were-checked-allegiance-appearance.html> (reporting on the event and the aftermath, and noting "no fat soldiers" were allowed to attend and soldiers who disagree with the current administration were instructed not to attend).

<sup>62</sup> *Trump Warns Protests at Military Parade Will Be Met With Force*, REUTERS (June 11, 2025), <https://www.reuters.com/world/us/trump-warns-protests-army-parade-will-be-met-with-very-big-force-2025-06-10>.

the President is entitled to criticize his political opponents, involving the military in domestic political skirmishes risks harming the military's ability to recruit and retain servicemembers and garner broad public support for its budgets and programs, therefore undermining its ability to achieve its core mission of protecting the nation. It is precisely for this reason that the military should be kept out of domestic law enforcement whenever possible.

### CONCLUSION

The National Guard serves a critical role in U.S. national security. Domestic deployments that fail to adhere to exacting legal requirements and long-established guardrails threaten their core national security and disaster relief missions, put the military at risk of politicization, and pose serious risks to both servicemembers and civilians. We appreciate the Court's due consideration of these critical factors in adjudicating the issues presented in the pending motion.

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Respectfully Submitted,

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## **APPENDIX – BIOGRAPHIES OF AMICI**

**Admiral Steve Abbot, U.S. Navy (Ret.)**, graduated from the U.S. Naval Academy in 1966, after which he was deployed to Vietnam and began a 34-year career with the U.S. Navy. His final active-duty tour was as Deputy Commander-in-Chief, U.S. European Command from 1998 to 2000. Following his retirement, Admiral Abbot served as Deputy Homeland Security Advisor to President George W. Bush from 2001 to 2003.

**Admiral Thad Allen, U.S. Coast Guard (Ret.)**, retired in 2010 as the 23rd Commandant of the U.S. Coast Guard. Admiral Allen led the federal responses to Hurricanes Katrina and Rita and the Deepwater Horizon oil spill. He led Atlantic Coast Guard forces in response to the 9/11 attacks and coordinated the Coast Guard response to the Haitian earthquake of 2010.

**Former Secretary of the Army Louis Caldera** graduated from the U.S. Military Academy at West Point and served in the Army on active duty from 1978 to 1983. He served in two Senate-confirmed positions in the Clinton Administration, including Secretary of the Army, and as an Assistant to the President and Director of the White House Military Office in the Obama Administration.

**General George Casey, U.S. Army (Ret.)**, enjoyed a 41-year career in the U.S. Army. He is an accomplished soldier and an authority on strategic leadership. During his tenure as the Army Chief of Staff, he is widely credited with restoring balance to a war-weary Army and leading the transformation to keep it relevant in the 21st century. Prior to this, General Casey commanded the Multi-National Force – Iraq, a coalition of more than 30 countries.

**General Michael Hayden, U.S. Air Force (Ret.)**, entered active military service in 1969. During his career, he rose to the rank of four-star general and served as Director of the Central Intelligence Agency and the National Security Agency. General Hayden also served as Commander of the Air Intelligence Agency and held senior staff positions at the Pentagon,

Headquarters U.S. European Command, and the National Security Council.

**Admiral Samuel Jones Locklear, III, U.S. Navy (Ret.)**, graduated from the U.S. Naval Academy in 1977. He served for 39 years and retired as commander of U.S. Pacific Command. His prior commands include Commander, U.S. Naval Forces Europe, U.S. Naval Forces Africa, and Allied Joint Force Command Naples; Commander, U.S. 3rd Fleet; and Commander, Nimitz Strike Group.

**General Craig McKinley, U.S. Air Force (Ret.)**, retired as a four-star general in November 2012 after 38 years of service. His last assignment was as the Chief of the National Guard Bureau, where he also served as a member of the Joint Chiefs of Staff. In this capacity, he was a military adviser to the President, the Secretary of Defense, and the National Security Council, and he was the Department of Defense's official channel of communication to the Governors and to State Adjutants General on all matters pertaining to the National Guard.

**Former Secretary of the Navy Sean O'Keefe** began his public service career in 1978 at the Department of Defense and as U.S. Senate staff until appointed the Department of Defense Comptroller and Chief Finance Officer in 1989. President George H.W. Bush later named him the 69th Secretary of the Navy. Secretary O'Keefe also served in President George W. Bush's Administration as Deputy Director of the Office of Management and Budget and the 10th Administrator of NASA.

**Admiral Bill Owens, U.S. Navy (Ret.)**, retired in 1996 as the Vice Chairman of the Joint Chiefs of Staff. He began his career as a nuclear submariner, spending a total of 4,000 days—or more than ten years—aboard submarines, including duty in Vietnam. Admiral Owens was a senior military assistant to two Secretaries of Defense and served as commander of the U.S. 6th Fleet during Operation Desert Storm.