

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>REBEKAH KATHERINE BREWIS,</b>	)	
	)	
Plaintiff, Pro Se,	)	<b>Case No. 1:25-cv-03513</b>
	)	
v.	)	Judge Sara L. Ellis
	)	
<b>PETERSON FARMS FRESH, LLC;</b>	)	Magistrate Judge
<b>AARON LEROY PETERSON,</b>	)	Daniel P. McLaughlin
<b>a/k/a R.J. ELLIOT, et al.,</b>	)	
	)	
Defendants.	)	

**PLAINTIFF'S SUPPLEMENTAL EMERGENCY MOTION FOR TEMPORARY  
RESTRAINING ORDER REGARDING DHS BLUE CAMPAIGN SURVEILLANCE OF  
PLAINTIFF**

*[Filed Ex Parte Pursuant to FRCP 65(b)(1)(B)]*

**I. INTRODUCTION**

1. Plaintiff Rebekah Katherine Brewis, proceeding *pro se*, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 65(b), the All Writs Act (28 U.S.C. § 1651), and this Court's inherent authority to protect the integrity of its proceedings, for a Supplemental Temporary Restraining Order addressing the warrantless surveillance of Plaintiff by a federal employee of the United States Department of Homeland Security assigned to the DHS Blue Campaign.

2. This Supplemental TRO is filed in conjunction with Plaintiff's primary TRO Motion and Rule 60(b) motion filed contemporaneously herewith. While the primary TRO addresses evidence preservation and the illegal destruction clause, this supplemental motion addresses a distinct threat: the surveillance of a human trafficking victim by a federal anti-trafficking official connected to named Defendants through a documented institutional chain.

3. Plaintiff acknowledges that DHS Secretary Kristi Noem and the Department of Homeland Security are not presently named defendants in this action. Plaintiff intends to name Secretary Noem in her official capacity in the Second Amended Complaint upon reinstatement. This motion is therefore structured to seek relief through three legally independent channels that do not require DHS party status: (a) orders directed at named Defendants regarding their coordination with DHS personnel under FRCP 65(d)(2); (b) non-party preservation notices under this Court's inherent authority; and (c) referral to the DHS Office of Inspector General.

## **II. FACTUAL BACKGROUND**

### ***A. Mark Pini --- DHS Blue Campaign Employee***

4. On May 17, 2025, Plaintiff discovered that Mark Pini, a federal employee of the United States Department of Homeland Security, had been viewing Plaintiff's Facebook profile with sufficient frequency or recency to trigger Facebook's algorithmic suggestion of Pini in Plaintiff's "People You May Know" feed.

5. According to Pini's publicly available Facebook profile, documented by Plaintiff via contemporaneous screenshots on May 17, 2025, Pini's employment includes: (a) U.S. Department of Homeland Security, September 6, 2023 to present; (b) U.S. Department of Homeland Security Blue Campaign, September 6, 2023 to present; and (c) Thin Blue Line USA, September 5, 2023

to present. Pini's current city is Miami, Florida. Pini is a nationally known public figure who appeared on the A&E television series "Live PD" and the series "COPS" as a K9 handler, maintaining over 43,000 Instagram followers and over 17,400 TikTok followers.

6. The DHS Blue Campaign is the Department of Homeland Security's national public awareness campaign against human trafficking. According to the official DHS website, the Blue Campaign is "located within the DHS Center for Countering Human Trafficking" and its "educational awareness objectives consist of two foundational elements: prevention of human trafficking and protection of exploited persons."

***B. The Peterson — Miami — DHS Connection***

7. In December 2020, Peterson Farms Inc. acquired Lakewood Organics, LLC (also known as Florida Bottling), a juice company headquartered in Miami, Florida (**Exhibit II**). This acquisition was announced by Defendant Aaron Peterson, CEO of Peterson Farms Inc. Mark Pini, a DHS Blue Campaign employee, resides in Miami, Florida---the same city where the Peterson family operates Lakewood Organics, LLC.

8. As established in the First Amended Complaint (Dkt. #39) and in Plaintiff's contemporaneously filed Rule 60(b) motion, Defendant Mark V. Peterson maintains a documented four-prong relationship with DHS Secretary Kristi Noem: (a) personal friendship; (b) financial sponsorship via NRA event hosting; (c) business/client relationship through Peterson Farms' federal regulatory profile; and (d) ongoing marketing partnership. Secretary Noem oversees all DHS operations, including the Blue Campaign and the Center for Countering Human Trafficking where Pini is employed.

9. The documented chain connecting named Defendants to the surveillance is: Defendant Aaron Peterson (CEO, Peterson Farms Inc.; Owner, Lakewood Organics, Miami FL) → Mark V. Peterson (Aaron's brother; documented four-prong relationship with Secretary Noem) → DHS Secretary Kristi Noem (oversees Blue Campaign, Center for Countering Human Trafficking) → Mark Pini (DHS Blue Campaign employee; resides in Miami, FL; surveilled Plaintiff's Facebook). This chain establishes that Pini is a person acting "in active concert or participation" with named Defendants within the meaning of FRCP 65(d)(2)(C).

### ***C. The Documented Surveillance Event***

10. On May 17, 2025, Plaintiff captured contemporaneous screenshot evidence at the following times: (a) 1:53 PM---Pini's Facebook profile main page showing DHS employment, Miami residence, LivePD affiliation, and K9 handler status; (b) 1:54 PM---Pini's Facebook "About" page showing DHS employment since September 6, 2023, Blue Campaign employment since September 6, 2023, current city Miami, FL, and DHS Seattle check-in December 16, 2023; and (c) 1:56 PM---confirmation that Plaintiff blocked Mark Pini.

11. The discovery that a federal anti-trafficking official was surveilling her social media caused Plaintiff to experience a severe panic attack. Plaintiff disclosed to her Aetna Better Health case manager (**Exhibit G**) that she was being trafficked and stalked. As a direct result, the Naperville Police Department conducted a welfare check on Plaintiff, creating an independent law enforcement record corroborating the event and its psychological impact.

### ***D. Pattern of Coordinated Surveillance***

12. The Pini surveillance is part of a documented pattern of surveillance by individuals connected to DHS and the Peterson family network, including: (a) Mark V. Peterson's documented

surveillance of Plaintiff's Instagram account (June 28, 2025); (b) Mark V. Peterson's documented surveillance of Plaintiff's Facebook account (late 2024--early 2025); (c) anomalous Google Trends search activity from Washington, D.C. following Plaintiff's federal filing (August 24-30, 2025); and (d) Defendant Aaron Peterson's creation of the "R.J. Elliot" Facebook alias, discovered by Plaintiff in the "People You May Know" algorithmic feed on February 17, 2024, constituting identity-based evasion consistent with surveillance awareness. Plaintiff's fear of this surveillance network was so severe that she attempted to self-deport to Canada on April 15, 2025 (**Exhibit GG**).

### **III. LEGAL FRAMEWORK**

#### ***A. Jurisdiction to Issue Relief Regarding Non-Party Federal Actors***

**13.** This Court possesses three independent bases of authority to grant the relief requested, none of which requires DHS or Secretary Noem to be a named party:

**14.** *First—FRCP 65(d)(2)(C): Persons in Active Concert with Parties.* An injunction binds not only named parties but also "other persons who are in active concert or participation with anyone described in" the parties or their agents. Fed. R. Civ. P. 65(d)(2)(C). The documented Peterson-Noem-DHS chain (§9) establishes that DHS personnel conducting surveillance of Plaintiff are acting in concert with named Defendants. Orders directed at named Defendants to cease coordinating surveillance through DHS channels, and to preserve evidence of such coordination, fall squarely within FRCP 65(d)(2).

**15.** *Second---Inherent Authority and the All Writs Act.* Federal courts possess inherent authority to "manage [their] proceedings, vindicate [their] authority, and effectuate [their] decrees." *Kokkonen v. Guardian Life Ins. Co.*, 511 U.S. 375, 380 (1994). The All Writs Act, 28

U.S.C. § 1651(a), authorizes federal courts to "issue all writs necessary or appropriate in aid of their respective jurisdictions." Courts routinely issue preservation notices to non-parties under this authority when evidence relevant to pending proceedings is at risk of destruction. *See Silvestri v. Gen. Motors Corp.*, 271 F.3d 583, 591 (4th Cir. 2001).

**16. *Third---Referral Power.*** This Court's authority to refer matters to the DHS Office of Inspector General for investigation is inherent and requires no party status. Courts routinely refer apparent misconduct by federal employees to appropriate oversight bodies. *See* 5 U.S.C. App. § 4(d) (Inspector General Act).

### ***B. Substantive Constitutional Claims***

**17. *Fourth Amendment.*** The warrantless surveillance of Plaintiff's social media by a federal employee acting under color of federal authority implicates the Fourth Amendment. *Carpenter v. United States*, 585 U.S. 296 (2018). Where a federal employee uses government authority or resources to monitor a private citizen's social media without a warrant, such surveillance is subject to constitutional scrutiny.

**18. *First Amendment Retaliation.*** The surveillance occurred after Plaintiff filed her federal complaint (April 1, 2025), creating a temporal inference of retaliatory intent. Government surveillance of a citizen in retaliation for exercising the right to petition constitutes First Amendment retaliation. *Hartman v. Moore*, 547 U.S. 250 (2006).

**19. *TVPA Anti-Retaliation.*** Surveillance of a trafficking victim by a federal anti-trafficking official— connected to the trafficking principals through the documented Peterson-Noem-DHS chain— constitutes retaliation and intimidation that the TVPA was designed to prevent. 18 U.S.C. § 1593A (retaliation against witnesses in trafficking cases).

### ***C. TRO Standard***

**20.** The standard for a temporary restraining order under FRCP 65(b) requires: (1) likelihood of success on the merits; (2) likely irreparable harm absent relief; (3) balance of equities favoring movant; and (4) public interest. *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008). The Seventh Circuit applies a sliding scale. *Ty, Inc. v. Jones Grp., Inc.*, 237 F.3d 891, 895-96 (7th Cir. 2001).

## **IV. ARGUMENT**

### ***A. Likelihood of Success on the Merits***

**21.** Plaintiff demonstrates a likelihood of success on the merits of her claims that federal personnel acted in concert with named Defendants to surveil her. The documentary evidence establishes: (a) a DHS Blue Campaign employee surveilled Plaintiff's Facebook profile; (b) the same employee resides in the city where Defendants operate a subsidiary; (c) the chain connecting named Defendants to DHS leadership is documented through the Peterson-Noem four-prong relationship; and (d) the surveillance occurred after Plaintiff filed this federal action, supporting retaliatory intent. The pattern of surveillance by multiple individuals connected to the Peterson-DHS network (§12) further supports the inference of coordination rather than coincidence.

### ***B. Irreparable Harm***

**22.** Absent injunctive relief, Plaintiff faces: (a) a continuing chilling effect on her First Amendment rights to communicate about her trafficking experience and pursue this litigation; (b) jeopardy to her physical safety through location and activity tracking; (c) ongoing psychological harm to a trafficking victim with documented PTSD, ADHD, anxiety, and autism spectrum disorder— harm that has already required police welfare intervention (§11); and (d) potential

coordination between DHS personnel and Defendants' legal team compromising litigation integrity.

***C. Balance of Equities and Public Interest***

23. The balance of equities overwhelmingly favors Plaintiff. Cessation of warrantless surveillance and preservation of surveillance records impose no legitimate burden on anyone. The public has a compelling interest in ensuring federal anti-trafficking resources protect trafficking victims rather than surveil them for the benefit of their traffickers. The Blue Campaign's stated mission is the "protection of exploited persons." Using Blue Campaign personnel to surveil a trafficking victim plaintiff undermines public confidence in federal anti-trafficking efforts.

**V. RELIEF REQUESTED**

24. Plaintiff respectfully requests that this Court enter a Supplemental Temporary Restraining Order as follows:

***A. Orders Directed at Named Defendants Under FRCP 65(d)(2)***

(a) Enjoining named Defendants, their officers, agents, attorneys, employees, and all persons acting in active concert or participation with them— including but not limited to any DHS employee, contractor, or agent coordinating with Defendants— from conducting, directing, facilitating, or requesting any surveillance of Plaintiff's social media accounts, online activities, physical location, or communications; (b) Ordering named Defendants to preserve and produce all communications between any Peterson family member, Peterson-affiliated entity, or their counsel and any DHS employee, official, or contractor regarding Plaintiff, including but not limited to communications with Mark Pini, Mark V. Peterson's communications with

Secretary Noem or DHS officials, and any communications through which surveillance of Plaintiff was requested, coordinated, or discussed;

***B. Non-Party Preservation Notices Under Inherent Authority and All Writs Act***

(c) Issuing a preservation notice to the United States Department of Homeland Security directing preservation of all records relating to any monitoring, surveillance, investigation, or inquiry regarding Plaintiff by DHS employees, including but not limited to: database queries, social media monitoring logs, communications between DHS personnel and any Peterson family member or Peterson-affiliated entity, and communications between DHS personnel and counsel for Defendants; (d) Issuing a preservation notice to DHS directing preservation of all records documenting whether Mark Pini or any other DHS employee accessed any federal database or information system to search for, query, or obtain information about Plaintiff;

***C. OIG Referral***

(e) Referring this matter to the DHS Office of Inspector General for investigation of whether Blue Campaign personnel conducted surveillance of a trafficking victim in coordination with, or for the benefit of, individuals alleged to be trafficking principals in this action;

***D. Conditional Relief Upon SAC Filing***

(f) Ordering that, upon the filing and acceptance of a Second Amended Complaint naming DHS Secretary Kristi Noem as a defendant in her official capacity, the preservation notices and surveillance injunction set forth herein shall automatically

convert to binding injunctive relief against Secretary Noem and DHS under FRCP 65(d)(2)(A), without the need for a separate motion; (g) Granting such other and further relief as this Court deems just and proper.

**VI. EX PARTE CERTIFICATION**

25. This motion is filed ex parte for the reasons set forth in Plaintiff's Ex Parte Certification filed contemporaneously herewith. Advance notice to Defendants would: (a) enable the destruction of DHS surveillance records; (b) alert DHS personnel to sanitize communications and database access logs; and (c) enable coordination between DHS and Defendants' counsel to fabricate alternative explanations for the surveillance. The risk of evidence spoliation is particularly acute given that Defendants have already demonstrated willingness to require evidence destruction through the Settlement Agreement's illegal destruction clause (**Exhibit A**).

Respectfully submitted,



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Rebekah Katherine Brewis

*Plaintiff, Pro Se*

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Dated: February 26, 2026

**CERTIFICATE OF SERVICE**

I, Rebekah Katherine Brewis, hereby certify that on February 26, 2026, I caused a true and correct copy of the foregoing to be served upon all counsel of record via the Court's CM/ECF electronic filing system, which will send notification of such filing to the following:



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Rebekah Katherine Brewis

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