

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

SALEM MEDIA OF ILLINOIS, LLC, <i>et al.</i> ,  Plaintiffs,  v.  J.B. PRITZKER, <i>et al.</i> ,  Defendants.	No.  <b>Declaration of Amy Jacobson</b>
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Pursuant to 28 U.S.C. § 1746, I declare that the following facts are true, to the best of my knowledge, information, and belief:

1. I am a resident of Cook County, Illinois.
2. I graduated from the University of Iowa, Phi Beta Kappa, with a degree in broadcasting in 1991.
3. After graduating, I worked as a television reporter for stations in Alexandra (MN), Tucson, El Paso, and Detroit.
4. I returned to my home state of Illinois in 1996 to work as an on-air news reporter for NBC-5 WMAQ (Chicago).
5. While on television, I won a regional Emmy Award and was nominated for an additional six regional Emmy's.
6. I transitioned from television to radio upon joining WLS in 2008.
7. I moved from WLS to WIND AM 560 in 2010. There, I am cohost of "Chicago's Morning Answer." I spend four hours every morning on air delivering the news along with insight, opinion, and analysis.

8. I also routinely contribute to the station's other shows and news updates as a field reporter.
9. I have covered numerous major media events for AM 560, including election night coverage in 2012, 2014, 2016, and 2018; former Governor Rod Blagojevich's final press conference before entering prison, and his first press conference upon his return from prison; and the 2016 presidential debate in St. Louis.
10. I also make and break news on my social media channels.
11. I began attending the Governor's daily COVID-19 press conference on Friday, April 17, 2020.
12. On May 14, I asked the Governor at the press conference about his furlough of over 1,000 prisoners during the pandemic, including 64 convicted murderers.
13. On May 13, I asked about the disconnect between the Governor's legal position in various COVID-related cases and a 2001 Attorney General opinion given the opposite interpretation of his powers under the emergency management.
14. On April 18, I asked the Governor about the difference between his plan for reopening the state and the President's plan. I asked two follow-up questions about Chicago lakefront access for bikers and joggers, after which the governor's press secretary cut off in-person questioning.
15. After asking those three questions on April 18, I watched the governor's press secretary Jordan Abudayyeh appear to become agitated with my line of questioning. I heard her say at the end of the press conference that "things in these briefings are going to change." I approached her for clarification, and she did not elaborate.

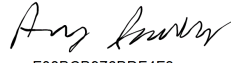
16. On April 19, I received an email sent to all reporters from Abudayyeh notifying us that the press conference that afternoon was moving to a pooled coverage system “to further ensure we’re appropriately following social distancing guidelines.” A copy of the email is attached to this affidavit as Exhibit 1.
17. Abudayyeh put this system in place after a month of in-person briefings where reporters were spaced out in the room. Under the pool system, the press room was re-configured to end the physical presence of all reporters except two pool reporters, one for print and one for broadcast. Radio did not receive separate pool representation. Under the new system, non-pool reporters were required to submit questions to the pool reporters, who would then relay the questions to the Governor and his staff during the briefings
18. Under this new system, I was invited to participate live in the press conferences via videoconference technology (WebX) and submitted my question to be read by the pool reporters to the Governor.
19. The new system made it much harder to ask follow-up questions.
20. On April 23, 2020, I asked the Governor about the State of Illinois being forced to declare bankruptcy and he responded that “Amy clearly doesn’t understand what happens when an organization goes through a bankruptcy and out the other side.”
21. On April 29, 2020, the Governor corrected a previous statement he had made in a press conference in response to a question I asked about President Trump’s phases.
22. On May 15, 2020, I reported that the First Family was remaining overnight at their horse farm in Wisconsin. A copy of the tweet is attached as Exhibit 2.

23. On May 16, 2020, I was one of several speakers at a “Reopen Illinois” rally outside the Thompson Center in downtown Chicago sponsored by Freedom Movement USA, a nonprofit grassroots civic organization.
24. I sometimes speak at public events and on news/talk programs other than my own to share my reporting and editorial views.
25. I undertake these speaking engagements within my employer’s policies governing employee conduct.
26. While at the rally, I gave remarks that repeated views I had given on my radio show many times previously.
27. While at the rally, I observed two people holding signs making Nazi references. On My Twitter that day I called those signs “offensive,” saying “There is NO need for this.” A copy of the tweet is attached as Exhibit 3.
28. On Monday, May 18, 2020, I attempted to participate in the Governor’s videoconference press conference, but the question I submitted to the pool reporters was not read.
29. I reported that day that I was “BLOCKED from @Gov Pritzker’s daily briefings.” A copy of the tweet is attached as Exhibit 4.
30. Later that same day, I received an email from the Governor’s press secretary, Jordan Abudayyeh, a copy of which is attached as Exhibit 5.
31. Since Abudayyeh’s email, I have been blocked from participating in the WebX videoconference like other journalists.
32. My inability to participate and ask questions of the Governor during his press conferences on the same basis as other journalists significantly hampers my ability to do my job as AM

560's reporter covering the most important story happening in Illinois right now, namely the Governor's ongoing response to COVID-19.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 31, 2020

DocuSigned by:  
  
F08BCB976BDF4F3...

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Amy Jacobson, declarant

# EXHIBIT 1

**From:** Abudayyeh, Jordan <Jordan.Abudayyeh@Illinois.gov>  
**Sent:** Sunday, April 19, 2020 3:35:37 PM  
**To:** Abudayyeh, Jordan <Jordan.Abudayyeh@Illinois.gov>  
**Cc:** SanchezMolina, Jose <Jose.SanchezMolina@Illinois.gov>; Hanns, Alex <Alex.Hanns@Illinois.gov>  
**Subject:** UPDATED PROCEDURE: Governor's 2:30pm briefing

Reporters—

I appreciate your patience as we navigate a new normal due to COVID-19.

**STARTING MONDAY:** To further ensure we're appropriately following social distancing guidelines we will now only allow one print pool reporter and one broadcast pool reporter in the room for the governor's daily press briefings. We will continue to accept questions from our portal that most of you have already been using.

The broadcasters have organized themselves into a pool without my involvement and will continue doing so. Broadcasters, only the reporter from the pool team that day will be allowed in the room. Print reporters, I trust you can talk amongst yourselves to work out a similar system, but let me know if I can be helpful. Pool reporters gather questions from their colleagues and ask them in the room. I will continue working to ensure reporters working from home and from across the state are also equally represented by asking questions from our portal.

The only thing I ask is that you let me know who will be the pool reporters that day so I can let the security desk know who to expect.

Please let me know if you have any questions. I look forward to the day when we can return to a normal press conference set up where we can stand too close together and shout over each other once again.

Thanks!  
 Jordan

--  
**Jordan Abudayyeh**  
 Press Secretary  
 Office of Governor JB Pritzker  
 312.533.5950

# EXHIBIT 2


twitter.com/AmyJacobson/status/1261476605978951683

WI Talk Radio Sho... Regional Account... Calendar Fillers Bookmarks Google Calendar -... University of Stat... N



- Home
- Explore
- Notifications
- Messages
- Bookmarks
- Lists

← **Tweet**



**Amy Jacobson**  
 @AmyJacobson









Now I'm hearing that @GovPritzker has a 1,000 acre ranch in Kenosha, WI. That's where the family is tending to the animals tonight. You know #essential workers while most of us have been deemed "non essential. "  
[@MorningAnswer](#) [@DanProft](#)

9:00 PM · May 15, 2020 · [Twitter for iPhone](#)

106 Retweets 300 Likes

# EXHIBIT 3



-  **Home**
-  **Explore**
-  **Notifications**
-  **Messages**
-  **Bookmarks**
-  **Lists**
-  **Profile**
-  **More**

**Tweet**









 **Tweet**



**Amy Jacobson**  
@AmyJacobson

Here in Chicago I found 2 signs to be offensive. There is NO need for this. @GovPritzker @MorningAnswer @DanProft



-  **Home**
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-  **More**

**Tweet**



**Mark Maxwell**  @MarkMaxwellTV · May 16

Several protesters carried signs that read "death to tyrants." Others carried signs with racist, anti-Semitic imagery. They're standing near the statue of an American president who was assassinated by a racist who considered him a tyrant.

[Show this thread](#)



3:32 PM · May 16, 2020 · [Twitter for iPhone](#)



# EXHIBIT 4

twitter.com/AmyJacobson/status/1262486394506747906

WI Talk Radio Sho... Regional Account... Calendar Fillers Bookmarks Google Calendar -... University of Stat... Nat

**Tweet**

**Amy Jacobson**  
@AmyJacobson

I've been BLOCKED from @GovPritzker's daily briefings. "Some" fellow reporters, egged on by Rick Pearson, have convinced @JordanAbudayyeh not to take my ?'s ever again. I WANT it in writing from their office! @MorningAnswer This was a ? I wanted answered. Got link from a friend

1:30  
Messages

All Q&A (4) My Q&A (2)

Ask a Question

**Q: Amy Jacobson (me)** 1:30 PM  
Did you receive my ?

**Q: Amy Jacobson (me)** 1:29 PM  
Amy Jacobson WIND radio: You mentioned Friday that a GOP Super Pac was threatening your family. What group and what are the nature of their threats? Have you contacted IL State Police?

**Q: Jerry Nowicki** 12:47 PM  
Please let me know that this was received, if you will.

**A: Jake Strother** 12:50 PM  
Jerry - got it

**Q: Ryan Denham** 1:04 PM  
Jake, can you please confirm receipt of my question?

**A: Jake Strother** 1:05 PM  
Ryan - got it

3:53 PM · May 18, 2020 · Twitter for iPhone

134 Retweets 317 Likes



## EXHIBIT 5

**From:** "Abudayyeh, Jordan" [REDACTED]@Illinois.gov>  
**Date:** May 18, 2020 at 5:04:49 PM MDT  
**To:** Amy Jacobson [REDACTED]  
**Subject:** RE: FRIDAY - GOV'S DAILY BRIEFING

Amy—

This weekend you attended and spoke at a political rally to fire up the crowd opposing the Governor's policies to combat COVID-19. That rally was attended by people holding hateful Nazi imagery. An impartial journalist would not have attended that rally in that capacity and therefore you will no longer be invited to participate as an impartial journalist.

As a former journalist myself, I have the utmost respect for journalists who do the tough work to hold public officials accountable while preserving the unbiased coverage we all rely on.

Thank you,  
Jordan

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Jordan Abudayyeh  
Press Secretary  
Office of Governor JB Pritzker  
[REDACTED]  
[REDACTED]@Illinois.gov