

DECLARATION OF TARA GOODARZI

I, Tara Goodarzi, declare as follows:

1. My name is Tara Goodarzi. I am above 18 years of age and am competent to make this declaration. I reside in the City of Chicago.
2. On Friday, October 10, 2025, around 10 a.m. I heard there was federal activity in the area near where I live. In line with Governor Pritzker's request that Chicagoans document ICE activity, I drove to an area near the Wilson Red Line stop in Chicago to see if I could observe the activity.
3. I saw federal officers and parked near them in an alley parking lot off Wilson Avenue. The federal officers and I left the alley parking lot after a few minutes.
4. One of the federal officers angled their vehicle in front of my car so I could not pass, and the second vehicle came behind me tightly so that I was boxed me in on Buena Avenue.
5. Three agents came out and approached my car. They were all wearing full body gear and masked up. One agent was holding what appeared to be a semiautomatic weapon. Although it wasn't pointed directly at me, it wasn't pointed towards the ground either. One agent asked, "why are you following us?" When I responded that I was just driving, the officers then demanded my identification.
6. I asked if the officer could ask the other officer to stop pointing the gun at me. He responded that it wasn't in my face. I told them I am allowed to drive in the city. They said they just wanted my ID. Once I gave it to them, an officer took a picture of it and appeared to receive a message on his phone before handing it back to me.
7. I asked for their ID and they refused to disclose it or provide any identification number. I told them that this violated a federal judge's TRO but they said they did not have to identify themselves.
8. One of the agents had yellow duct tape on the label of his vest but it did not have anything written on it.

9. Another woman then came upon the scene and was filming the incident and told them that they were a disgrace. They responded by telling her to be careful on the street because that's how a person gets run over.
10. Attached as Exhibit A to this declaration is a video I recorded with my cellphone of the interaction I had when the federal agents came up to my car.
11. On Friday October 24, 2025, I was volunteering at my child's school library as I often do on Fridays, when I heard that federal agents had deployed tear gas nearby, at Henderson and Lakewood, which is near where I live.
12. I got into my car and drove to that intersection in order to provide aid and speak to my neighbors about what they observed. As I arrived I saw a group of residents. I parked and got out of my car. There were no federal officers in the area at the time.
13. I spoke to multiple neighbors who had observed tear gas being used. Several neighbors described tear gas coming into their homes.
14. I reviewed a video filmed by a neighbor I met at the scene, which shows federal agents deploying tear gas on civilians who were protesting their presence. The group of civilians can be heard in the video yelling for the agents to leave. Tear gas can be seen billowing into the homes on the side of the street. I have attached this video as exhibit B to this declaration.
15. I reviewed a video of a neighbor filming a federal officer and being shoved away by the officer without any apparent justification as tear gas fills the street. I have attached this video as exhibit C to this declaration.
16. Below I have pasted a photo of a cannister I saw at the scene.



17. The next day, Saturday October 25, 2025 I was getting ready to take my son to soccer practice in Avondale when I learned that federal agents were in the Avondale area and had deployed gas. I decided that it wasn't safe to take my son to practice, so I instead traveled in the direction of 3700 N Kildare to observe as I did the day prior.

18. On my way to 3700 N Kildare, I learned that federal officers were at Windy City Produce on Pulaski, and I drove there instead. Shortly after I arrived, I heard whistles being blown on Roscoe and Harding. I parked and ran over there where I saw a Chrysler van driving slowly down the street towards Harding surrounded by federal agents. A number of community members had gathered and were peacefully protesting the presence of heavily armed federal officers in their neighborhood.
19. I could not see visible unique identification on any of the federal officers who I saw on Roscoe.
20. I saw a woman, who I learned lives nearby, standing in front of the van as it was advancing. A federal agent pushed her to the side and she fell down in the street behind the van, which continued proceeding down Roscoe toward Harding, now unimpeded.
21. As the van got to Harding street, federal agents threw a CS gas cannister back towards those of us standing on Roscoe and the sidewalk and then got into the van and drove away.
22. At the time the CS gas was deployed none of the residents present had done anything violent towards the federal officers. As far as I could tell the federal officers did not need to use the tear gas in order to continue driving west down Roscoe.
23. I quickly became affected by the tear gas and had difficulty breathing. Many other people present became very ill from the gas, coughing and even fainting.

24. Below I have pasted a photo I took of the CS gas cannister.



25. My encounters with masked, armed agents refusing to identify themselves and deploying dangerous chemical agents, have caused me tremendous fear, anxiety, and stress. Since I was detained on October 10, I have begun suffering from frequent heart palpitations and skipped beats, insomnia, and panic attacks. I have an upcoming doctor's appointment to discuss heart medication to help me regulate this stress. I am a healthy, able-bodied 37-year-old who has never suffered cardiac symptoms like this before in my life. Because the agent took a photo of my drivers' license on his phone, I fear retaliation at my home, where I live with two young children. Every knock on a door or sound at night causes me to panic. I am scared to drive my kids in my car because they have my license plates. I was on the highway the other day and had to pull over in a panic because I thought I may have been

completely inadvertently following them, and I was scared they would arrest or assault me.

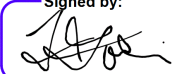
26. While these emotional and physical symptoms are extremely difficult to bear, until a doctor tells me otherwise, I will not be deterred from standing in solidarity with my community to teach folks their rights and collecting evidence that demonstrates violations of federal law.

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on:

10/26/2025

Date

Signed by:

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Tara Goodarzi

Exhibits

The above-listed exhibits are available at the following Hightail link:

<https://spaces.hightail.com/space/eVIUNWmZh1>