

DECLARATION OF BRUCE TURNER

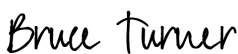
I, Bruce Turner, being over 18 years of age and competent to make this declaration, declare as follows:

1. I live in the Lakeview neighborhood of Chicago, Illinois.
2. On October 24, 2025, at around 12pm, I was at home with my wife when I heard whistling and shouting outside.
3. I went outside to see what was happening and observed two unmarked SUVs with federal agents inside and standing on the running boards at the intersection of Henderson Street and Lakewood Avenue. The vehicles were traveling south down Lakewood toward School Street.
4. Lakewood is a one-way street running north to south. The unmarked black SUV in the front was facing the correct way on Lakewood and was driving south toward School.
5. The unmarked white SUV was facing the wrong direction and was reversing south down Lakewood toward School behind the black SUV.
6. I started recording the agents when they were at the intersection of Henderson and Lakewood and continued recording as they drove down Lakewood. The video I recorded is attached to this declaration as Exhibit A.
7. Other residents were already outside on the sidewalks and curbs. Some were chanting and shouting statements at the agents like “go home” and “cowards don’t show their faces.” Some were also filming the events.
8. At no point did I see anyone touch an agent, throw anything, or act violently toward the agents in any manner.
9. I did not see any visible identification or badges on the agents. They were all wearing gaiter masks covering their faces and most were wearing sunglasses.
10. The SUVs continued south on Lakewood unimpeded. Protestors on foot and on bicycles moved slowly along the sides of the streets with the vehicles, but I did not see anyone block their path or stand directly in front of the SUVs.
11. The black SUV began to move faster than the white SUV toward School and then appeared to stop to allow the white SUV to catch up. No one was standing between the two SUVs.
12. I then heard a loud popping sound and saw tear gas begin to emanate from a canister that an agent in the white SUV had thrown north—opposite the direction it was moving—toward the intersection of Henderson and Lakewood.

13. I did not hear any verbal warning or command from the agents prior to the deployment of tear gas.
14. The white SUV then continued reversing south on Lakewood toward School before deploying at least two additional tear gas canisters behind it toward the intersection of Henderson and Lakewood. These subsequent canisters were thrown about 15 seconds after the first canister, and no warning was given by the agents between the uses of tear gas. These subsequent canisters appeared to be thrown toward the sidewalks where protestors had been standing.
15. The wind carried the tear gas throughout Lakewood, and I inhaled some of it.
16. My eyes and throat immediately began to burn. I started coughing heavily and had difficulty breathing. I could also feel the burning on my skin.
17. I ensured that my wife went back inside, and then I followed her to try and escape the gas.
18. The location where the agents deployed the tear gas is one block from a playground that frequently has young children playing there.
19. My neighbors, who were walking their dog when the tear gas was deployed, also had to run inside to get away from the gas.
20. This incident has made me fearful about observing or protesting the actions of federal officers in my neighborhood. Nevertheless, I intend to continue doing so if they return.

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.

Date: 11/3/2025

Signed by:

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Bruce Turner

Exhibits

Exhibit A is available at the following hightail link:

<https://spaces.hightail.com/space/35dl5EoEsD>