

DECLARATION OF TERRENCE ROCHE

I, Terrence Roche, declare as follows:

1. My name is Terrence Roche. I am above 18 years of age and am competent to make this declaration. I reside in Oak Park, Illinois.
2. I am a veteran and former officer of the United States Marine Corps, and currently work as a full-time lecturer.
3. On Friday, September 26, I attended a protest at the ICE detention facility in Broadview, Illinois. I went to protest because I am concerned that the federal government is violating Fourth Amendment rights of individuals in our country by detaining them with little oversight and deporting them without due process. I was disturbed by reporting about masked, unmarked federal agents conducting arrests. I am unaware of any other federal agency that allows its employees to conduct their activities while hiding their identities.
4. I arrived around 7 am and joined a group of protesters near a cross-walk at 25th Avenue and Harvard Street. I was standing in the grass on the side of a public street near the cross-walk. The protesters who were present were singing protest songs and holding signs.
5. I walked west on Harvard Street. I noticed agents standing behind a gate at the end of the street. The agents were wearing olive green uniforms, helmets, and masks. The agents fired pepper balls towards me and other protesters. We were located approximately 25 yards away from the gate. I did not hear or observe any warnings or dispersal orders before the agents used pepper balls and tear gas. I was not hit directly by the pepper balls, but I got some pepper ball residue on my backpack and I ingested some CS gas. The gas caused me to cough and irritated my eyes. I had been exposed to CS gas during Marine Corps training exercises about 25 years ago and was able to recognize the gas used as CS gas. I did not hear an order or instruction to disperse at any time during this interaction or at any time while I attended the protest.
6. I stayed in the area with other protesters on the street and on a grassy area adjacent to the street. The protesters sang songs and played guitar. A few protesters had megaphones. One protester next to me told the agents that God was going to judge them.

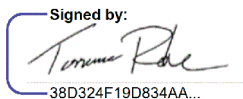
7. Over the next couple of hours, I noticed protesters getting hit with pepper balls and rubber bullets, even though they were doing nothing aggressive against the agents. I noticed one person attending the protest being assisted away by two others from the area of the gate. It looked like he had been doused in pepperballs and fumes and had to be assisted while slowly walking away. I noticed other people who were, by my estimate, 15 to 25 yards away from the gate who were nonviolently chanting, holding up signs, and playing music getting shot with pepperballs and rubber bullets by the agents. There were agents shooting from behind the gate and behind a fence on Harvard Street adjoining the gate. The protesters who were hit reacted by coughing and retreating. Again, I never heard any warnings or dispersal orders.
8. Around 9:30 am, a group of agents emerged from the gate. I was about 50 yards away from the gate standing in the street with a group of protesters. The protesters were chanting and holding signs. Suddenly, I was hit in the head with a forceful projectile. The impact released a large payload of CS powder over my head. Neither I nor anyone near me was doing anything to threaten or impede anybody when I was hit.
9. The force of the projectile caused me to stumble and lose my footing. I could not breathe, and CS powder got into my eyes. I was gagging and felt like I would throw up. I felt shocked and disoriented. I slowly made my way down Harvard Street towards 25th Avenue and then left the protest.
10. I did not hear or observe any warning, order to disperse, or other indication that the agents would use gas or other weapons against protesters before I was hit with the projectile.
11. After being hit in the head, I had a lump on my forehead from the impact of the projectile. Later that day, I felt foggy-headed and had a headache and ringing in my ears. I went to the emergency room that day, where I was told I had experienced a concussion and underwent a CT scan. I continue to experience concussion symptoms.
12. What I witnessed at Broadview on September 26 unnerved and upset me. The agents at the ICE facility used violent tactics and chemical weapons against people who were protesting through nonviolence. I intend to return to continue to protest at the ICE facility in Broadview, but I am afraid of being seriously injured if I 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.

Executed on:

10/3/2025

Date

Signed by:

38D324F19D834AA...

Terrence Roche