

Declaration of Michelle Narvaez

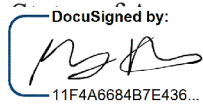
1. I am over the age of eighteen and have personal knowledge of all matters contained in this Declaration.
2. If called to testify as to the contents of this Declaration, I would be competent to do so.
3. I am a resident of Cook County, Illinois. Since Friday, September 19, 2025, I have been regularly attending protests and demonstrations at the Immigration and Customs Enforcement (“ICE”) detention facility located on Beach Street.
4. I began coming to the Broadview site because I want to help people who are expressing their First Amendment rights stay safe. I spend nearly all of my time that I am not working with protestors outside of the ICE facility.
5. I have witnessed repeated, unprovoked violence by ICE agents, and Customs and Border Patrol (“CBP”) agents, against people peacefully assembling outside the facility.
6. The force I have witnessed includes the use of pepper balls, tear gas canisters, and flash bangs, often at moments where there is no visible law enforcement or immigration activity and when protestors are offering no resistance to federal agents. Protestors are on the street or sidewalk while this occurs.
7. For example, on September 22, 2025, I witnessed a troubling interaction between agents and a sixteen-year-old boy who was present at the facility to drop off possessions for his father.
8. After the child got the attention of an ICE agent at the door of the facility and was told to approach the door, a separate agent on the roof shot at him with pepper balls.
9. He posed no threat to any officer, and this act of violence was without warning.
10. On another occasion, on the evening of September 24, 2025, there were approximately 10 demonstrators hundreds of feet from the facility who were peaceably assembling by an aid tent on the sidewalk. An ICE agent appeared on the roof of the facility, and, out of the blue, began shooting pepper balls at us. Several of the pepper balls hit my car.
11. I have noticed negative effects on nearby businesses from the use of chemical weapons. The air quality is noticeably poor near the facility because of the repeated uses of tear gas and pepper balls, and I know that fumes from these weapons has entered storefronts, at times forcing businesses to close their doors.

12. On Friday, September 26, I witnessed federal law enforcement shooting a projectile at a local business , breaking its window.

13. I intend to continue coming to the Broadview site, and have, but the actions of federal law enforcement have made it more difficult for me to do so.

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury under the laws of the United

States that the foregoing is true and correct. Executed on October 2, 2025.

DocuSigned by:

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Michelle Narvaez