

### **Declaration of Scott Sakiyama**

I, Scott Sakiyama, declare as follows:

1. My name is Scott Sakiyama. I am over 18-years-old and competent to testify. I am a United States citizen who resides in Oak Park, Illinois.
2. I started going to the United States Immigration and Customs Enforcement (ICE) detention facility in January, 2025, shortly after President Trump's inauguration because there were rumors that extensive ICE operations would occur there. I wanted to see if those rumors would prove to be true so that I could bear witness and get word about any unconstitutional and frightening activity. If this happened, I wanted to be able to document, share, and amplify my concern.
3. It is very important for me to be able to assemble in solidarity with concerned people at the facility, to help out, and to tell people what I observe.
4. Part of the reason this issue is so important to me is that my family is Japanese American and my family members were sent to internment camps during World War II. The idea that people are being detained without due process based on their heritage, appearance, and immigration status is alarming and devastating to me.
5. I drove to the ICE facility a few times in January and February.
6. At one point an ICE vehicle followed me for a few block while I was in my car.

#### **September 12, 2025**

7. My friends had visited the facility, and I was deeply concerned about what they were telling me, namely that there were snipers on the roof of the facility and that federal agents in tactical gear were grabbing people, depriving them of due process and liberty, and bringing them to the facility. I went there to see for myself.
8. In the early afternoon, I arrived at Beach Street between Lexington Street and Harvard Street. There was no fence there.
9. Not a lot was going on, just a few peaceful protestors standing around. I wanted to be there, but not be confrontational in any way.
10. Suddenly, a garage opened and out came 20 agents in tactical gear and camouflage fatigues with "SRT" on the sleeves. There was a van coming down Harvard Street. We had not realized that vehicles could or would come to the facility from that direction. My friend moved to see the van and get out of its way and an agent suddenly pushed her. She

was shaken and let out a loud cry. I helped her walk away. She has not returned to express her First Amendment rights since that day.

### **September 19, 2025**

11. I returned to the ICE detention facility early on the morning of September 19, 2025, to observe and record any ICE activity in public areas. I especially wanted to record activity so that I could communicate about it to my elected officials and to raise awareness among community members.
12. Gregory Bovino was present that morning and cars started coming into the facility.
13. When cars would come in and out, agents on the roof would shoot pepperballs at people.
14. At around 6:34 a.m., I observed journalist and candidate for U.S. House of Representative, Kat Abughazaleh, get pulled away from the facility by agents wearing tactical gear that said "ERO." I recorded video of an ICE agent throwing her to the ground at Beach Street and Harvard Street. It is available here:  
<https://x.com/KatAbughazaleh/status/1969013628398411810/video/1>
15. This video and others I have taken have helped me to reach out to elected officials in order to educate them about what their constituents are experiencing and marshal their support.
16. It looked like ICE Agents were taking pictures of demonstrators who were there.

### **September 26, 2025**

17. I returned to the detention facility on the morning of the following Friday, September 26, 2025.
18. Again, I stood back and peacefully observed, trying to document any inappropriate response by federal agents to civilian speech. Federal agents pushed protestors back on Harvard Street to 25th Avenue and grabbed and shoved protestors on the grass, sidewalk, and street. I and other protestors were heavily tear gassed.
19. My friend came with me based on what I had shared about the ICE agents' actions on September 19, 2025. He was standing and observing in the back. He was hit in the head with rubber bullets by an ICE agent with no provocation. I helped him get medical attention. He was diagnosed with a concussion.
20. I was gassed multiple times while on Harvard Street as I was trying to back away and observe. There was one peaceful protester who was not moving. He was in medical distress because of the ICE Agents' use of force against him. I was trying to observe and

document what was happening to him. I became overwhelmed by the tear gas the ICE agents were deploying. I required assistance to get out of the gas and flush my eyes. I was nauseous and thought I would vomit.

### **September 27, 2025**

21. I returned to the demonstration on the evening of September 27, 2025, but I stayed far away from the facility because I did not think I could handle more tear gas.
22. I stood at Beach Street and Lexington. No protestors stood at Beach Street and Harvard Street and any ICE vehicle could have easily moved in and out of that entrance.
23. Despite my best efforts to stay far away from federal agents, federal agents approached that area very quickly and subjected me and other demonstrators to tear gas again with no provocation or warning.
24. I was able to help people who were overwhelmed by the tear gas get up off the ground and wash their eyes. I was coughing and my eyes were affected.

### **September 30, 2025**

25. A friend asked me to meet her at the Broadview detention facility to support a U.S. Citizen who had been scooped up earlier the day in an immigration enforcement raid. When I arrived, I was intimidated because of the presence of snipers on the roof and the fence on Beach Street creating an area in which civilians could be easily trapped. I was also aware that ICE was photographing people who appeared at the facility.

### **October 2, 2025**

26. I heard that the ISP was putting up a “free speech area.” I returned to observe, but it was disconcerting to be there without other civilians. I was afraid I could be grabbed by a federal agent without anyone else noticing.

### **October 3, 2025**

27. At least a dozen officials attended the protest on October 3, 2025, several at my invitation or because they watched videos I had recorded. This had been part of my goal in exercising my right to free speech and assembly.
28. I was assembled with these officials on Harvard Street. ICE came to clear people out and Illinois State Police officers appeared to be helping them. It was utterly terrifying. Gregory Bovino pushed me. He told me, “Get your ass back.”
29. I watched ICE agents grab and arrest my friend for absolutely no reason. This friend attended the demonstration because of what I had shared about my observations. He

wanted to exercise his First Amendment rights to voice his disagreement with the federal government's actions in detaining people based on both their ethnic appearance and their use of free speech. After he was arrested, I spoke to his wife who was terrified that he had been arrested especially because he is of Latino heritage (even though he is a U.S. citizen and elected official). I started to question whether I was endangering my friends by having them exercise their right to assemble and speak alongside me.

### Overall Impressions

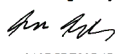
30. Each week the ICE Agents have been increasingly and unnecessarily violent in different ways. The protesters, including myself, have remained peaceful. I want to continue to reach out to other concerned citizens and to engage them with my words and images from the peaceful protests.
31. It is crucial that people understand what the federal government is doing.
32. However, being at the facility is absolutely terrifying. I have young children. I really have to evaluate when I can go back to exercise my First Amendment rights, if I can continue to do this, and what precautions I can take.
33. I repeatedly ask myself: By continuing to speak close to the Broadview detention facility, what level of danger will I be in? Will I get grabbed off the street because federal agents don't like what I'm saying?

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:

10/4/2025

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DocuSigned by:  
  
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Scott Sakiyama