

DECLARATION OF CHARLES THRUSH

I, Charles Thrush, declare as follows:

1. My name is Charles Thrush. I am 22 years old and am competent to make this declaration. I reside in Chicago, Illinois.
2. I am submitting this declaration to describe how federal officers shot pepperballs and tear gas at me and other journalists as well as at protesters who seemed to pose no threat at the ICE facility in Broadview, Illinois.
3. I am a freelance reporter and I work mostly for Block Club Chicago. I am in my fourth year of journalism school at DePaul University.
4. I have gone to the protests at Broadview as a contract reporter for Block Club Chicago to report on the protests occurring there on two occasions: September 26, 2025 and September 19, 2025. On both occasions I was at the protests from approximately 6am CT to a little after 12pm CT.
5. On both September 19th and September 26th, when I attended the protests, I wore a visible press credential around my neck.
6. When protesters are face-to-face with law enforcement, I try to stand away from the protesters but near enough that I can observe and video or photograph. Sometimes, however, I am forced to go into a crowd of protesters to conduct interviews or to get a better perspective on what is happening so that I can accurately report on it.
7. On both September 19th and September 26th, I observed mostly peaceful protesters. I observed protesters engaging in acts that appeared to be obviously non-threatening like linking arms and blocking a road or throwing plushies and stuffed animals at cars driven by federal agents. I have also seen protesters heckling federal officers.
8. I have published four stories for Block Club Chicago over the past two weeks regarding the protests at the Broadview ICE facility and ICE's response to them.
9. I have reported on protests 27 times before. I have never seen law enforcement act so violently and aggressively towards protesters and journalists the way I saw federal agents acting on Friday September 26, 2025. I have never seen local or state

police in Illinois use chemical irritant weapons or less-lethal firearms since I began writing for Block Club. The federal officers attacked protesters over and over again without any clear justification for doing so.

10. In the past when I have attended protests I have seen agents give dispersal warnings using very loud speaker systems before using physical force to move protesters. There were automated dispersal warnings blasted from livespeakers on September 19, 2025.
11. No similar device or system was used on Friday September 26, 2025. Instead, repeatedly and often without warning, federal agents fired pepper balls, tear gas cannisters, and baton rounds into the crowd, either indiscriminately or without aiming at anyone who was posing any sort of imminent threat or disobeying any audible order.
12. I observed a couple of instances on September 26th where federal officers would yell for protesters to move away from the gate between Harvard St., where protesters were gathered, and Beach St., where the facility is located, and then would fire pepper balls or tear gas at protesters as they were moving away.
13. Sometimes it was hard to hear what the federal officers were telling protesters to do because their faces were covered by masks.
14. Around 10:20am on September 26th, I was directly fired upon by a federal officer with a pepper ball. I was standing away from any protesters on what I believe to be a public street, with my press pass clearly visible. I was filming as officers fired upon two protesters who were holding an umbrella as a shield. The protesters were at least 30 feet away from the gate between Beach and Harvard St. and I was at least another 30 feet away from them and the gate. Below I pasted a screenshot of a somewhat zoomed-in video showing my vantage point.



15. As I was filming, I saw an officer come out from behind the fence and shoot directly towards me. I was holding my camera up near my face and I was hit in the center of my left hand, which was holding my camera.
16. I was not threatening anyone in any way when I was shot. I had not been given any instructions to move.

17. Later in the day on September 26th the federal officers began escalating their violence against protesters and journalists alike. Officers indiscriminately tear gassed crowds. On several occasions I was tear gassed at fairly close range, despite my press pass being visible and not agitating or disobeying any orders.
18. Around 10:30am, I observed federal officers using baton rounds, large rubber bullets, on protesters. One woman protester had a baton round fired into her guitar by a sniper on the roof of the Broadview facility. The projectile went through her guitar and hit her upper thigh. Prior to this, I had observed her playing folk music on her guitar far from the Broadview facility. I have pasted below a picture of her broken guitar and the projectile that hit it:



19. I also observed that these baton rounds shattered two windows of the adjacent warehouse, 133 Harvard St.
20. At around 11:30am, federal officers formed a line and began firing pepper balls and throwing stinger grenades and firing tear gas canisters towards the protesters. They pushed the protesters all the way back to 26th Street.
21. Several times during the height of the officers' violence, I was forced to run or move away to protect myself or get to cleaner air and I was unable to capture what was happening on video.
22. During this escalation, I observed officers detain someone who was attempting to render medical aid to another person who had fallen down.
23. I estimate that of the approximately 50 journalists who were present at Broadview on the morning of September 26th, the majority were hit with pepper balls. All were subjected to tear gas.
24. In addition to being hit with a pepper ball myself, I personally observed the photographer I was there working with, Colin Boyle, hit with at least one pepper ball in the leg while wearing press identification.
25. I also personally observed another photographer, who had multiple camera lenses and press identification materials, clearly identifying him as a journalist, have a full tear gas canister thrown directly at him from fifteen feet away by federal officers. He was unable to walk for several minutes after this occurred.
26. I also observed another journalist, Raven Geary, be repeatedly fired upon by federal officers. She was repeatedly shot at and hit in the face with a pepperball.
27. By noon on Friday September 26, the federal officers' uses of force had caused most of the people to leave the area.
28. When I got home I took a cold shower to try to stop the burning on my skin where the pepper ball had struck me and where tear gas had touched me. I was unable to stop the chemical burning for approximately twelve hours.

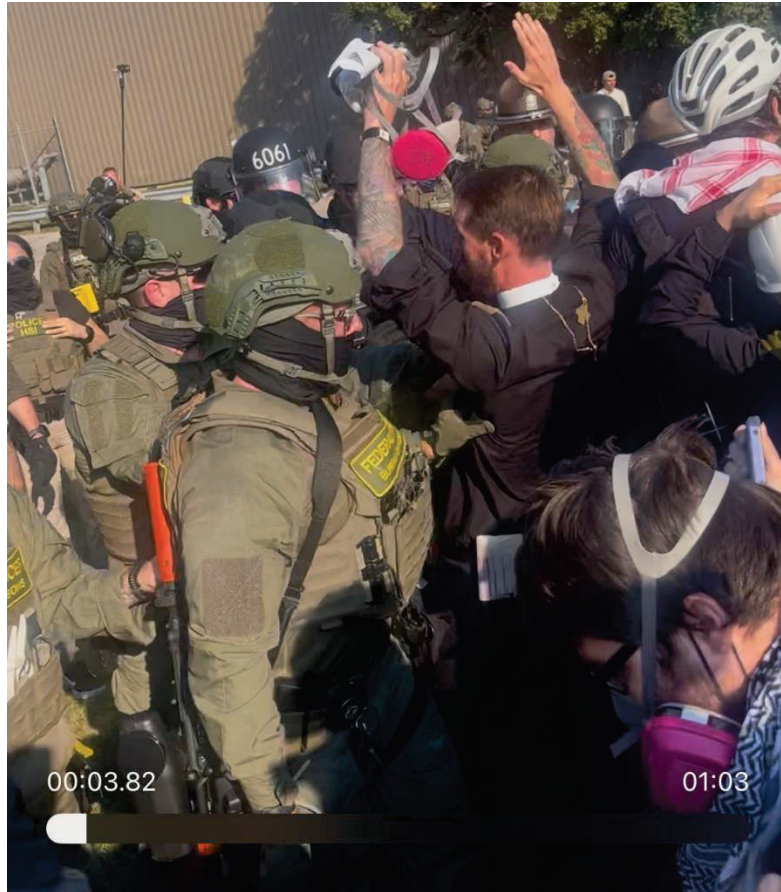
29. I had intended to return to Broadview to continue reporting on the protest on Saturday September 27th. However, because I was frightened after what I saw and what happened the previous day, I only wanted to attend if I could find a photojournalist who I trusted to go with me, and I was unable to do so. Accordingly, in order to keep myself safe, I did not attend the protest the following night, as I had been asked to do by my editors.
30. I returned to Broadview on Friday October, 3rd. I arrived around 7:20 am. I encountered between 100 and 150 protesters, fewer than last Friday.
31. The protest was at Harvard Street and 25th Street when I arrived. I arrived as the Illinois State Police was pushing protesters back to the green space on 25th Street. At this point it was fairly peaceful on both sides.
32. Then around 8:45am several ICE vehicles turned on Harvard Street from 25th Street. Some protesters tried to get in the way of the ICE vehicles and state police detained protesters after giving several verbal warnings not to step into Harvard Street.
33. I was briefly pushed by an Illinois State Police officer, who stopped pushing me as soon as he realized I was a member of the press.
34. Around this time a Federal Bureau of Prisons officer named “Joe” told me he thought that protesters who were trying to get closer to the Broadview facility to protest were clearly acting peacefully.
35. Then at 9:00am, 50-75 federal officers from ATF, Border Patrol, ICE, HSI, and the Federal Bureau of Prison, led by Border Patrol Chief Bovino came out. Bovino said, “this is your first and only warning” and apparently told the crowd to disperse, though I could not hear him clearly. The protesters were acting completely peacefully at this time and were entirely out of the street and at least 250 to 300 feet from the gate between Harvard Street and Beach Street (and perhaps 500 feet from the actual Broadview facility). It was not clear where the federal officers wanted people to go or what protesters could have done that would have satisfied them.
36. The state police moved back at this point and the federal officers started violently and forcibly pushing protesters even further back on the green space on 25th Street. The federal officers used their hands to grab people, punched out with their fists,

and detained several protesters who were simply protesting on the greenspace. They did not use pepperballs or shoot other things into the crowd this time.

37. Below are screenshots of a video I took in which two Bureau of Prisons officers violently arrested a protester and stepped on her sign that said “Immigrants in, Racists Out.”



38. I witnessed an identifiable member of the clergy, Michael Woolf of Evanston Illinois, have his nipples grabbed and twisted and his neck grabbed by a Federal Bureau of Prisons officer. He confirmed that his nipples had been twisted. I have pasted a screenshot of this below.



39. The bureau of prisons officer who did this was behaving erratically, going out into the crowd and grabbing at people. He attempted to grab at me and I backed away and show him my press pass and he moved on to grabbing at someone else.
40. Overall, the presence of the state police appeared to have a somewhat mollifying effect on the federal officers. As the day progressed, however, the federal officers became increasingly violent and took over crowd control from the state police, who had been allowing protesters to speak and demonstrate mostly without interference.
41. By the time I left around noon, the protest had largely broken up and there were only about 20 protesters left.
42. I still plan to regularly return to the Broadview facility to continue reporting but will only do so if I am able to keep myself safe, which I am not currently certain is possible given the actions I saw from the federal officers on September 26th and what I have heard about their actions at Broadview since. I may also have to stand

further back, which will make it harder to do my job of accurately reporting the events.

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:

October 3, 2025

A handwritten signature in black ink, appearing to read 'Charles Thrush', written over a horizontal line.

Charles Thrush