

### **Declaration of Stephen Held**

I, Stephen Held, declare as follows:

1. My name is Stephen Held. I am 53 years old and am competent to make this declaration. I reside in Chicago, Illinois.
2. I am a co-founder and reporter with Unraveled Press.
3. I have gone to Broadview over a dozen times since late August to observe and report on immigrant detainee movements in and out of the facility, to inform the public of situational changes at the facility, to observe and report on protests happening outside the facility, and to report on the federal government's response to those protests.
4. Whenever I am at Broadview, I ensure that I am not in any way obstructing the movement of ICE vehicles or federal agents. I obey any orders I am given to the greatest extent possible (though sometimes orders I have received, like "move back" and "do not go into the street" conflict). The extent of my interactions with federal officers are attempts to ask them questions, which I always do from a reasonable distance and in a non-threatening way.
5. For each day that I attended the protests over the last few weeks, I wore a helmet that said "PRESS" on the front and back and displayed my Chicago-Police-Department-issued press credentials visibly on my person.
6. When I attended the protest on Saturday, September 27, 2025, I wore a backpack that had a "PRESS" patch, in addition to my helmet marked "PRESS", and press credentials.
7. I have experienced verbal threats and intimidation from ICE agents on several occasions dating back to June when I reported on ICE activity in Chicago's immigration court
8. On several occasions, as I have reported outside of the Broadview facility, ICE agents have shouted my name from behind their fence in a clear attempt to threaten and intimidate.
9. I have witnessed a significant escalation of violence from federal agents directed at peaceful protesters and press over the last few weeks. In my time covering other protests and police violence, I have never before witnessed this degree or scale of undisciplined and unprovoked state violence.
10. Initially agents used physical force, such as violently shoving protesters or firing pepper balls towards those people attempting to block a vehicle entering or leaving the facility, and those people who stood on or near the facility's driveway. Then they escalated to agents

firing at anyone who set foot over the line between the sidewalk and what they said was federal property.

11. Agents later escalated to firing pepper balls, seemingly arbitrarily, at protesters who were not on federal property or in any way interfering with operations at the facility.

12. I witnessed multiple assaults on peaceful protesters simply standing outside the facility, in the street in front of it, or in the adjacent parking lot, doing nothing but talking at the federal officers. None of these protesters had weapons and none threw anything at the officers or their vehicles in these instances.

13. I saw several photojournalists walking around with telltale pepper ball marks on the front and backs of their shirt or vest.

14. I have reviewed witness video which shows ICE agents firing pepper balls at a protester with a mobility aid, while they were on the ground.

15. On one occasion, I witnessed agents shoot a pastor, David Black, in the head with pepper balls while he tried to talk to agents on the roof. Within five minutes of this attack, I witnessed another federal agent douse Black directly in the face with OC spray.

16. I saw agents firing pepper balls into the adjacent business lot at protesters or journalists who were observing through the fence on that side, even though they were not on federal property or interfering in any way.

17. I observed and experienced a significant escalation on September 19<sup>th</sup> with the added use of tear gas and flash bangs. On this day I was shot by an ICE SRT officer with a pepper ball in the groin from close range while another ICE agent yanked me around by the hood of my sweatshirt. Below I have pasted a photo of my pants after this attack showing the impact of the pepperball.



18. On this same day, I was also shot in the hip, presumably by a pepper ball, which resulted in a welt and bruise.

19. On Friday September 26<sup>th</sup> and Saturday 27<sup>th</sup>, there was even more escalation by federal agents including my arrest on September 27<sup>th</sup>.

20. On September 26<sup>th</sup>, I witnessed agents firing pepper balls, tear gas, and foam bullets into the crowd, seemingly indiscriminately and without apparent cause. I witnessed my colleague Raven Geary and several other photojournalists, including myself, crouched near a van to protect against pepperball fire. Agents directly targeted the group identified as press. Raven was shot in the face during this attack.

21. On September 27<sup>th</sup>, as protesters played music and chanted, in what I would describe as a peaceful, carnival-like atmosphere, agents emerged from behind their fence and quickly escalated by shoving protesters, confiscating possessions, and making arrests including my arrest without cause.

22. That day I arrived at Broadview at approximately 5:30pm.

23. At 5:56pm, U.S. Customs Border Patrol Chief Agent Greg Bovino and other agents opened the gates and announced “This is your only warning. If you don’t clear the road, you will be arrested.”

24. I immediately moved off of Beach Street and onto the grassy area.

25. Shortly after, at around 7pm, I noticed agents brought out a truck and were loading stacks of plywood and shoving around protesters.

26. I moved around a food and water tent that was blocking most of the grassy area to get past it and get a better view of what was happening with the truck and plywood.

27. I recorded an ICE agent I previously had seen violently perform a chokehold on a woman. He was exchanging insults with a protestor next to me.

28. Then, at 7:15pm, I recorded agents arresting a man.

29. A couple minutes later agents looked in my general direction and began marching toward me but then passed me. They grabbed someone at the fence, telling me to back up. I could not back-up since I was just a step or two off the street, which Chief Bovino had declared to be an “automatic arrest” zone. Since the action was moving to my right, I took a step to the left, away from the person agents were arresting.

30. I was then immediately tackled by one or more CBP agents. The agents handcuffed me, lifted me off the ground, and marched me down the street toward their facility. I was wearing a helmet that said PRESS on the front and back, my press credential on a lanyard around my neck, and a backpack with a press pass on it. As I was being handcuffed and marched away, I was trying to shout that I was a journalist. I saw my colleague Raven Geary and tried to yell for her. The arresting agent, whose name I believe to be Timothy Donahue (uncertain about the spelling) just laughed and mocked my cries for help and said something that I can best recall as: “No one can hear you. I’m not gonna help you. “

31. Neither the arresting agent, nor the Homeland Security Investigations and Federal Bureau of Investigations agents I interacted with inside the facility ever articulated a clear legal basis for my arrest.


32. I was released later that night without any charges.

33. I intend to return to Broadview and continue my work there as a journalist. Although I have legitimate fear for my life and safety, I believe it is important that the public be aware of what is happening there and how federal agents are responding to peaceful protesters with unreasonable force and gratuitous deployment of chemical munitions.

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  
Date

  
Stephen Held (Oct 3, 2025 15:30:57 CDT)  
Stephen Held