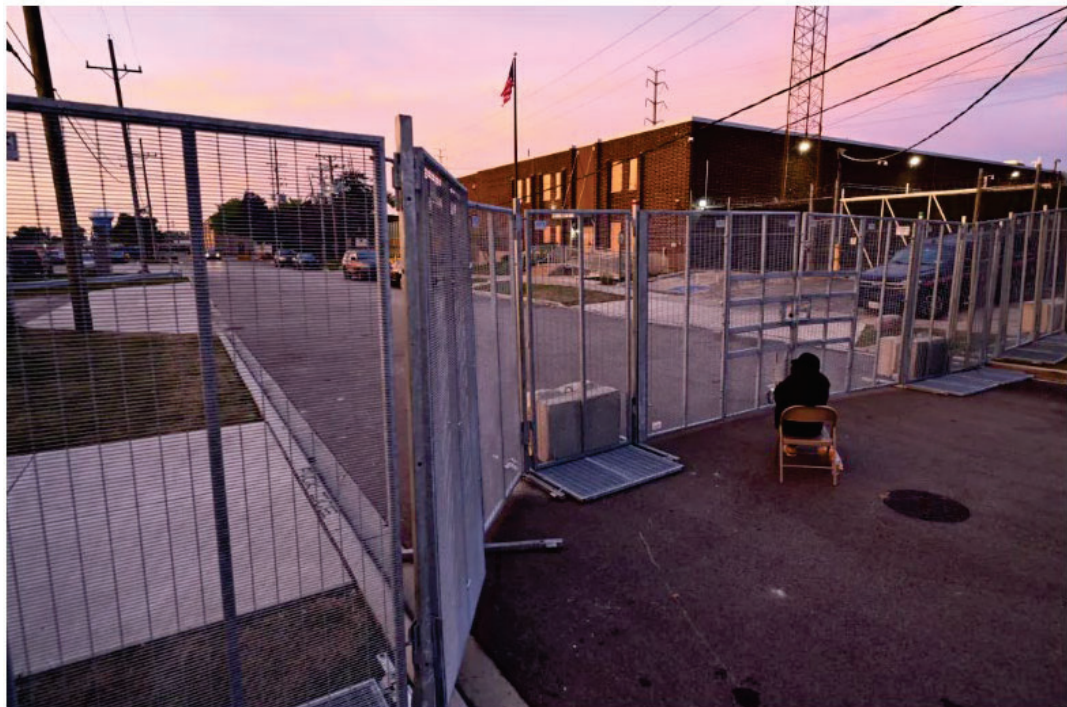


Docusign Envelope ID: 9BA7E4FE-2D8D-43CB-9E4B-0F95C9D1C28D

### **DECLARATION OF COLIN BOYLE**

I, Colin Boyle, declare as follows:

1. My name is Colin Boyle. I am competent to make this declaration. I reside in Chicago, Illinois.
2. I am the Director of Photography at Block Club Chicago. I receive daily assignments and assign freelance journalists to stories across the city.
3. I am submitting this declaration to describe how federal officers shot pepper balls and tear gas at me and other journalists who were not posing any apparent threat to the officers or federal property and were not disobeying any audible orders.
4. I attended protests at the Broadview detention facility on Wednesday, September 10 when myself and four other journalists documented federal agents entering and exiting the facility.
5. I returned to the protests on Tuesday, September 23 when there were 10-15 peaceful protesters present and a fence was erected in front of the facility.



High fencing went up around the Immigration and Customs Enforcement facility at 1930 Beach St. in Broadview, Ill. on Sept. 23, 2025. Credit: Colin Boyle/Block Club Chicago

6. On Friday, September 26, I witnessed a violent escalation from federal agents unlike any protest I had attended prior. I first stood by the smaller protest on Beach Street by the erected gate and Harvard Street near 25<sup>th</sup> Avenue for the rest of the protest coverage. I photographed protesters and the actions of federal agents from approximately 6:30 am CST to 12 pm CST.
7. When I attended the protest, I wore a visible black backpack that said PRESS and a green hat with a Velcro patch that said PRESS. I was also carrying two cameras and my Chicago Police PRESS identification card.
8. During the protest, I observed a majority of peaceful protesters who played music, chanted, marched, and occasionally filmed. There were about a dozen of these protesters when I arrived, about 100 around 9 am, and about two dozen left around noon after agents had fired chemical agents throughout the morning. I have pasted a picture of the protesters assembled on September 26<sup>th</sup>, which I took and which was published by Block Club.



Protesters demonstrated Friday morning outside the Broadview ICE facility. Credit: Colin Boyle/Block Club Chicago

9. Journalists with visible PRESS identifications and large cameras and legal observers in green hats were also present at the protest.
10. While a few agents at Broadview were identifiable by their names and agency badges (ICE), or agencies written across their chest (POLICE), most agents' uniforms did not have identification. DHS agents had numbers. I saw two agents who appeared to be with ICE SRT wearing camo with name tags that said COCHISE and ALVA, but I couldn't see their full names.
11. The agents appeared to be from various agencies: U.S. Department of Homeland Security (DHS), Immigration Custom Enforcement (ICE), U.S. Customs and Border Protections (CBP), Enforcement and Removal Operations (ERO), and local Special Response Team (SRT).
12. DHS agents wore full tactical gear. Other agents wore camo, black outfits, face coverings, neck gaiters, bullet proof vests, and tactical helmets. Some carried handguns on their waists, flash and stinger grenades, tear gas cannons, and collapsible batons.







**blockclubchi and 2 others**  
Broadview, Illinois

**Follow**



Liked by **chicagobabyyyyy** and **others**

**colinbphoto** Scenes from today's protest at the Broadview ICE facility as federal agents fired tear gas, rubber bullets, flash bangs and chemical agents at people during the hours-long demonstration. Protests outside the facility have been frequent in the face of the Trump administration's immigration Operation Midway Blitz.

13. DHS flew a helicopter over the protest for most of the time I was documenting.

14. Throughout the morning, I witnessed agents—including one who stood on the rooftop of the Broadview facility many feet away—fire chemicals and pepper balls indiscriminately and brazenly into the crowd of protesters and press, without warning.





**blockclubchi and 2 others**  
Broadview, Illinois

**Follow**



Colin Boyle/Block Club Chicago



Liked by **chicagobabyyyyy and others**  
**colinbphoto** Scenes from today's protest at the Broadview ICE facility as federal agents fired tear gas, rubber bullets, flash bangs and chemical agents at people during the hours-long demonstration. Protests outside the facility have been frequent in the face of the Trump administration's immigration Operation Midway Blitz.





**blockclubchi and 2 others**  
Broadview, Illinois

Follow ...

Colin Boyle Black Club Chicago

Liked by **chicagobabyyyyy** and **others**

**colinbphoto** Scenes from today's protest at the Broadview ICE facility as federal agents fired tear gas, rubber bullets, flash bangs and chemical agents at people during the hours-long demonstration. Protests outside the facility have been frequent in the face of the Trump administration's immigration Operation Midway Blitz.

15. The agent on the roof broke the windows of the office across the street, twice.



16. When standing on Harvard Street, I stayed near press primarily. I made sure the best I could that my press patches and identification were visible. We were standing near the wall of the office building south of the passageway. When federal agents told us to go back on the sidewalk, others and I complied.
17. I watched as my press colleague, Charles Thrush, was shot in the hand as he was filming.
18. I saw my colleague from Unravel Press, Raven Geary, after she was shot in the face while documenting the protesters and the federal officers' response to them.



19. As I was photographing protesters and federal agents, I was shot in my left leg by pepper ball rounds. Tear gas seeped into my respirator and visor. My eyes watered and I coughed a lot, making it difficult to do my job.
20. When I drove home later in the day, I had to drive with my windows down so as not to be engulfed by the chemicals that were still on my clothes.
21. I am perturbed by the brazen actions of federal agents and their indiscriminate attacks on journalists, as well as protesters. I will not stop practicing the First Amendment and partaking in my job as a photojournalist.
22. Block Club Chicago has adopted a policy requiring that we only attend the protest in teams of two or more in order to keep ourselves safe. This limits my ability to report on the protests as frequently as I otherwise would.

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.

10/2/2025

Date

Signed by:  
  
C83DE85F6B48492...  
Colin Boyle