

### **Declaration of Stephanie Lulay**

I, Stephanie Lulay, hereby declare:

1. I am the Executive Editor and Co-Founder of Block Club Chicago, which is a plaintiff in the above-captioned action. I make this declaration based on my own personal knowledge, and if called to testify, I could and would do so competently as follows.

#### **Background on Block Club Chicago**

2. Block Club Chicago is a 501(c)(3) nonprofit news organization, with no parent corporation and no stock, registered in the State of Illinois. The organization delivers daily, nonpartisan, and essential coverage of Chicago's diverse neighborhoods through its newsletter, news website, and social media pages. Block Club's website is read by 1.5 million unique readers each month, and our newsletters reach 135,000 Chicagoans weekly.

3. Block Club's mission is to build community through quality, accurate reporting grounded in readers' information needs. We aim to serve as a platform for community experiences, providing breaking news, investigative reporting and feature stories that highlight the people, places and events that make Chicago unique.

4. Block Club is known for its dedication to finding stories that resonate with the residents of Chicago. We publish thousands of stories annually. In 2024, Block Club Chicago earned the prestigious Business of the Year award from LION Publishers, recognizing it as the top local news organization in the country.

#### **Block Club Chicago Coverage of DHS Protests**

5. Block Club Chicago has covered numerous protests, including protests in response to federal immigration raids and enforcement in Chicago.

6. On June 4, 2025, Block Club Chicago reported on the detention of at least 10 people by ICE at a DHS office building at 2245 S. Michigan Avenue. Reports of the arrest on social media prompted activists and alderpeople to arrive at the scene. Ald. Anthony Quezada (35<sup>th</sup>) told us that an advocate informed him that people received text messages instructing them to come to

the building for “surprise check-ins” as part of the federal Intensive Supervision Appearance Program. We spoke a woman whose mother had an upcoming immigration check-in appointment the following month but received a text message informing her to check in on June 4<sup>th</sup> instead. Immigration authorities detained her upon arrival, according to her daughter. The federal agents wore facial coverings, carried long guns, and were seen pushing back a group of people who had assembled to protest. Quezada told us that he was aggressively pushed to the ground by agents.

7. On June 11, 2025, we covered an anti-ICE protest in downtown Chicago that led to the arrest of seventeen people, four of which were charged with federal crimes. Thousands of demonstrators attended the protest, which was peaceful and orderly until a car drove through the crowd, breaking a 66-year old woman’s arm. Shortly after, police and protesters clashed where officers attempted to part the crowd to allow a police wagon to leave the scene.

8. On June 14, 2025, we reported on the ‘No Kings’ march, which was attended by an estimated 75,000 in protest of various controversial policy changes from the Trump Administration. Eleven people were charged or given citations in connection with the march, and only one person was arrested.

9. On June 18, 2025, we reported accounts of federal agents detaining at least three protesters at a small demonstration two days prior. About a dozen advocates gathered outside of the Chicago Immigration Court building at 55 E. Monroe St. to protest the detention of immigrants during their scheduled court hearings. After giving a verbal warning to stand away from a loading dock, federal agents pushed protesters and shoved people to the ground.

10. On September 6, 2025, about 3,000 people marched in protest against the Trump Administration’s plans for a large-scale enforcement operation, and hundreds gathered for a subsequent protest on September 10, 2025.

11. On September 16, 2025, we covered the gathering of protesters in Montrose Park to demand justice for the fatal shooting of a man that immigration officers sought to arrest after he dropped his children off at school.

12. On September 19, 2025, our reporters witnessed DHS agents tear gas and shoot pepper spray bullets and flash bang grenades at demonstrators outside of an immigration processing center at 1930 Beach St. in Broadview. Around 8:30am, ICE and CBP agents drove into a crowd of protesters who were blocking the exit to the facility's secure lot. Tensions swelled and the crowd grew to about 150 demonstrators by the evening, with agents again firing pepper balls at the crowd. Multiple demonstrators required medical attention. Congressional candidate Kat Abughazaleh was thrown to the ground by federal agents. At least nine protesters were arrested, including one woman who was pushed to the ground by federal agents. Our reporters and photographers on the scene witnessed agents toss cans of tear gas while an officer on the roof of the building fired pepper spray bullets at people, including members of the media holding only cameras and notebooks. In the evening, about 20 officers approached the protesters and threw a flash bang grenade at the crowd while agents on the roof fired pepper balls.

13. On September 22, 2025, we reported that community organizers planned to protest daily at the Broadview facility until it shuts down, and legal resources and medics would be accessible for at least two upcoming protests. The following day, high fencing was put up overnight around the facility. The fencing extends across the street, keeping demonstrators far from the facility's driveway. Broadview's acting fire chief wrote to DHS informing the agency that the fences were built on a public street and blocked local firefighters from emergency access. The fence remains standing as of the date of this filing.

14. On September 26, 2025, federal agents tear gassed and shot rubber bullets at demonstrators outside the Broadview facility again. For an hour and a half following the initial tear gas deployment, officers fired pepper spray balls and tear gas canisters at protesters, organizers, journalists, and photographers alike. Congressional candidate Bushra Amiwala was struck by pepper bullets. That same day, Broadview Mayor Katrina Thompson wrote to DHS asking the agency to stop "deploying chemical arms, such as tear gas, pepper spray, etc. against American citizens, our residents, and our first responders" at the Broadview facility.

15. On September 27, 2025, federal agents arrested at least one journalist and used chemical weapons against protesters and members of the press. A second journalist was shot in the face with a pepper ball by federal officers and required medical attention, our reporters witnessed. The National Lawyer's Guild stated that federal agents "appeared to directly target legal observers who were actively documenting arrests and law enforcement actions" using chemical agents, kinetic grenades, rubber bullets, amce, and pepper balls. One legal observer was shot directly in the face with a projectile. . We reported on a joint statement issued by Evanston Mayor Daniel Biss, State Sen. Robert Peters and 40<sup>th</sup> ward Ald. Andre Vasquez urging civilians to stay away from further protests near the Broadview facility, fearing that ICE will be willing to use lethal force on peaceful protesters.

16. On September 28, 2025, we reported an account of a news reporter who was shot with a pepper ball while inside her truck, causing the chemical agents to engulf the inside. The reporter was physically ill for two hours afterwards.

17. On September 29, 2025, we covered Governor Pritzker's press conference where he stated that military troops had apparently been requested "for the protection of ICE personnel and facilities." The memo, issued by DHS Secretary Andrew Whitaker, requests the deployment of Department of War "personnel, trained and equipped for mission security in complex urban environments," adding that the troops would serve "in direct support of federal facility protection, access control, and crowd control measures."

#### **Continuing Press Coverage of ICE Raids**

18. Block Club Chicago has reallocated a significant portion of its resources to focus on covering DHS actions at protests.

19. Block Club Chicago has sent at least seven reporters and photo-journalists to Broadview to cover the protests since September 19, 2025.

20. During that time, at least four of our employees or freelancers have told me that they were been hit with pepper balls and subjected to tear gas by federal agents at the Broadview

facility while reporting including Charles Thrush, Leigh Giangreco, Audrey Richardson, and Colin Boyle.

21. I cannot recall any prior instance where so many of my journalists encountered such tactics reporting on a single protest or event.

22. It is our policy at Block Club Chicago that all reporters and photo-journalists who we send into the field wear visible press credentials while reporting and I believe that the journalists I dispatched to Broadview complied with this policy.

23. Our policy regarding journalists is that they should always prioritize their safety when reporting and that if they feel unsafe in any way they should leave.

24. Our journalists attend protests as observers and never engage in acts of disobedience or rendering aid to protesters and never trespass on private property. Their role is to document and report on what is happening so that the citizens of Chicagoland can be informed.

25. To my knowledge and experience, the frequency of law enforcement assaults on press and other First Amendment violations is higher than any other period of protest in recent memory, aside from 2020.

26. The raids by ICE and other DHS, along with related protests, are highly newsworthy and therefore important for the press to cover. In addition, the protests themselves, and the response of federal law enforcement, have become a major national and international news story as protesters are met with exceedingly greater force than any other protests since at least 2020.

27. The violence against and arrests of journalists at Broadview especially since Friday September 26, 2025, have impacted our ability to report on what is happening there.

28. For example, I pulled a journalist from the Broadview protests this week because their photographer partner had left and I (along with our other editors) was unwilling to allow them to remain in the area by themselves. This meant that we were not able to report on the events that continued that evening because of our fear for our journalists' safety.

29. We have instituted a policy that every journalist be accompanied by a partner to report at Broadview or anywhere else where they are likely to encounter federal law enforcement and protestors. We only institute this policy when we perceive there to be a significant danger of violence against journalists (either by law enforcement or agitators at protests). In this case, we have not found any reason to fear that the protestors at Broadview—as opposed to the federal law enforcement—pose any danger to our journalists’ safety.

30. We intend to continue to report on the protests at Broadview, but our ability to do so to the standards that we hold ourselves continues to be impacted by our fears of violence and arrests of our employees and contractors.

Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed on October 2, 2025 in Chicago, Illinois.



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Stephanie Lulay