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### **DECLARATION OF PAUL GOYETTE**

I, Paul Goyette, declare as follows:

1. My name is Paul Goyette. I am competent to make this declaration. I reside In Oak Park, Illinois.
2. I am a freelance photographer. My photographs have been published by the South Side Weekly (a local Chicago newspaper) and other publications.
3. Around 5:45 am on Friday, September 26, I traveled to the Immigration and Customs Enforcement (“ICE”) facility on Beach Street in Broadview, Illinois. I planned to photograph the protest activities there.
4. That day, I was carrying multiple Nikon Z-8 cameras with professional lenses approximately 6-8 inches long and approximately 4 inches in diameter.
5. I noticed a group of approximately 20 people peacefully gathered at 25th and Harvard, which I photographed. This group grew and was engaged in a Jericho walk on the cross walk at 25th and Harvard, silently praying.
6. Later Friday morning, I witnessed a flash bang grenade explode about 15 feet away from me.
7. At approximately 10:40am, I witnessed federal agents use OC spray against protestor who appeared to be doing nothing to agitate or impede federal activity, and then arrest him.
8. Around that time, I witnessed federal law enforcement targeting members of the press who attempted to record the arrest, one of whom had a press badge and the other had a large professional camera with a telephoto lens. The agents shot tear gas to the area where these members of the media were reporting, forcing them to move away to avoid further effects of the gas.
9. At this same time, federal agents shot a tear gas cannister through the window of a private building. I witnessed tear gas streaming out of the building’s window.

10. Agents were indiscriminately using tear gas at this point. While I photographed, I was surrounded by the gas and felt like I was going to suffocate and could not breathe.

11. I could not continue reporting and left the protest approximately 30 minutes later.

12. I returned to the ICE facility in Broadview the next day, Saturday, September 27, around 5:45 pm. This time, I came to the Beach Street/Lexington side of the building. There was a tall fence and gate in the middle of the street blocking access to the facility. Behind the fence and gate, near the ICE facility, I saw agents with uniforms marked ATF, who weren't wearing masks; agents with Customs and Border Patrol insignia, who were masked and did not wear any badge numbers or name identifiers; and an unmasked man I recognized as Customs and Border Patrol commander Greg Bovino.

13. Around 6 pm, the gate was unlocked and I saw agents exit through the gate. At that time, a number of protesters were standing in the street in front of the gate. The protesters complied by moving to the sides of the street. The Customs and Border Patrol agents were able to proceed down the street marching alongside vehicles. The agents later returned behind the fence.

14. I saw agents come out and make arrests, including a journalist with whom I am familiar, Steve Held. When I crossed the street and started taking Steve's picture, an ICE agent put his hand on my shoulder and said to me "you're okay for now, but be careful." I have been active documenting protests for some time both at immigration court in Chicago and at Broadview, and I interpreted this statement to mean that I had been surveilled by federal law enforcement and was known to them.

15. Around 8 pm, agents massed behind the fence. They opened the gate and shot tear gas and pepper balls at the crowd. Although I could tell the agents were saying something, it was not possible to make out what they said, despite the fact that the crowd attempted to go silent at the time to hear what the agents were saying. I did not hear any amplified orders of any kind, despite the fact that I have heard amplified sound on other occasions. No warning was given before the agents shot tear gas into the crowd. I heard protestors saying at the time "we can't hear you;" the protestors were simply standing and verbally engaging with law enforcement. At the time, there was an armored bearcat federal law enforcement vehicle behind the officers that had a law enforcement officer in it, sticking out of the hatch.

16. At that time, I was standing approximately 10-20 feet behind the crowd, in large part because I was anxious because of the prior force the I had experienced. My moving back due to prior law enforcement violence impeded my ability to carry out my responsibilities as a member of the media.

17. I have since returned to report at the Broadview facility, and intend to continue reporting at the Broadview facility, but my ability to do so is harder because of the violence directed at me and my colleagues. I have also been forced to purchase expensive personal protective equipment and am terrified to go back.

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:

10/2/2025

Date

DocuSigned by:

Paul Goyette

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Paul Goyette