

**Declaration of Shawn Mulcahy**

1. I am over the age of eighteen and have personal knowledge of all matters contained in this Declaration.
2. If called to testify as to the contents of this Declaration, I would be competent to do so.
3. I am submitting this declaration to describe how federal officers shot crowd-control projectiles at me and targeted other journalists who seemed to pose no threat at the ICE facility in Broadview, Illinois.
4. I am the News Editor at the Chicago Reader, an independently weekly newspaper based in Chicago.
5. I am a member of the Chicago News Guild.
6. Since September 5, 2025, I have been regularly attending protests and demonstrations at the Immigration and Customs Enforcement (“ICE”) detention facility located on Beach Street in Broadview.
7. I come to the detention facility in my capacity as a member of the news media, and when there, am clearly identified as press, including by wearing press credentials around my neck, carrying a notepad or filming activity, and wearing a helmet marked “PRESS.”
8. I have witnessed repeated targeting of members of the media by federal law enforcement, including ICE and Customs and Border Patrol (“CBP”) agents.
9. On the morning of Friday, September 26, 2025, I was shot with what I believe was a rubber bullet or foam ball while standing on Harvard Street, filming an arrest. I was clearly engaged in news-gathering activity and was targeted for this action.
10. The targeting of news media is not limited to me. That same Friday morning, I was part of a large group of press standing apart from the protestors on what I believe is a public street. We were clearly identifiable as journalists. Federal law enforcement threw tear gas directly at us, and another agent began shooting pepper balls directly at us.
11. At the times federal agents used force against me, I was not agitating or impeding law enforcement activity in any way.
12. I have witnessed multiple other members of the press being targeted with violence. This violence has escalated since September 5, 2025, my first day there. Each time I return,

**EXHIBIT 22**

there are more law enforcement who appear more agitated and more heavily armed.

13. I 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. While I have not been breaking any laws or disobeying any orders from federal officers, I am afraid that I will be targeted, injured, or arrested for continuing to report at Broadview.

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 2, 2025.

Signed by:

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Shawn Mulcahy