

DECLARATION OF BRAD THOMSON

I, Brad Thomson, do swear or affirm under penalty of perjury:

1. I am an attorney licensed in the state of Illinois and admitted in the Northern District of Illinois. On September 26, 2025, I went to the Broadview ICE detention facility in an attempt to visit clients detained there. Another attorney, Amanda Yarusso, was with me.
2. I was not in the area to protest.
3. First, I went to the Beach St. side of the facility. I loudly announced that I was an attorney and was told to step aside and wait for “management.” I was denied the ability to visit with my clients in person, but was told I may be able to speak with them on the phone.
4. Eventually I proceeded to the Harvard side of the facility to speak with agents there.
5. On the Harvard side, I saw about 12-15 agents, some in green and beige camouflage and some in all black.
6. There were approximately 20-30 people chanting. The general message of the chanting was to protest ICE deportations and the current ICE actions in the Chicago area.
7. Some of the 20-30 people were holding signs. The signs were critical of ICE and some equated ICE to Nazis or fascists.
8. There was a chain link fence separating the group of people demonstrating and the agents.
9. I handed an agent my business card through the fence and Amanda did the same. We requested that these cards be provided to the clients and we were waiting to see whether and how we could speak with our clients.
10. There was a person on a megaphone talking about all the violence in our society and how violence perpetuates more violence. She was talking about the violence of ICE against detainees and protesters and connecting it to the violence of men against women. She was saying that there is no accountability in our society for violence and talked about her own experiences of violence from men.
11. Suddenly, with no warning whatsoever after those statements on the megaphone, ICE agents deployed 5-10 rounds of pepper balls. I looked at the time and it was about 10:20 p.m.
12. Immediately following the rounds of pepper balls an agent shouted, “I’m sick of this,” and something to the effect of “Enough is enough.”
13. There was no physical provocation before the pepper balls were deployed. The only “provocation” I could discern were the statements on the megaphone deploring violence.
14. As the pepper balls were deployed, the crowd retreated and some people were knocked to the ground.
15. I went back to the Beach side of the facility to try to inquire about my clients again.
16. I was coughing a lot and my throat continued to have a burning sensation for several hours afterwards.
17. At no point was I allowed to visit with my clients at the Broadview facility.

18. My clients were driven away from the facility and released at other locations. No agents notified me that my clients were removed from the facility or provided me any information about where they could be found.

19. I learned that one of my clients was released at a gas station half a mile away from the facility.

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:

10/5/2025

Date

Signed by:



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Brad Thomson