

FIRST SUPPLEMENTAL DECLARATION OF PAUL GOYETTE

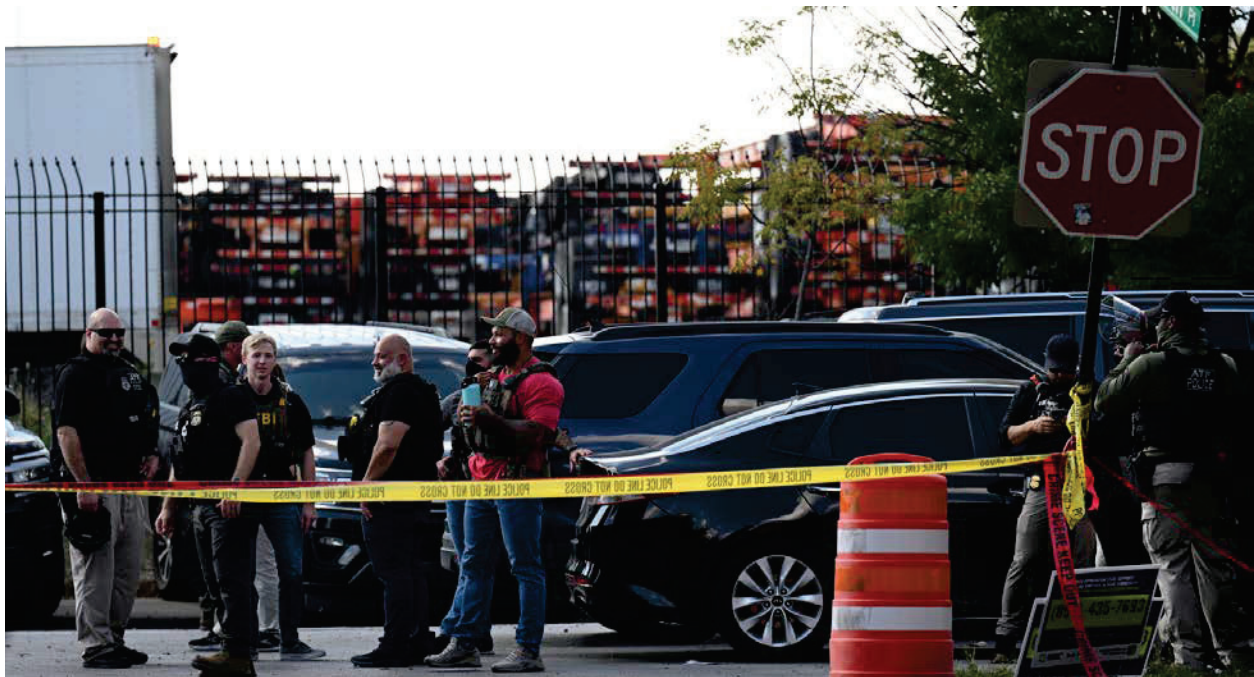
I, Paul Goyette, declare as follows:

1. My name is Paul Goyette. I am competent to make this declaration.
2. On October 4, 2025, I heard that federal agents including Immigration and Customs Enforcement (“ICE”) and Customs and Border Protection (“CPB”) were active in the Brighton Park community of Chicago, Illinois
3. I did not go to the scene at first to document anything because the reports were quite gruesome.
4. Eventually, many concerned citizens were calling for people to show up to the community so I thought I better go. As a photographer. I feel like I can add a layer of protection to my friends and neighbors who are assembling and voicing their first amendment rights.
5. I drove to 40th Street and Kedzie and Kedzie was blocked off by federal agents.
6. From what I observed, federal agents were occupying the area on Kedzie from Pershing to 40th avenue, including 39th.
7. When I walked up to Pershing Street and Kedzie, civilians were running away saying that tear gas had been deployed.
8. At Pershing and Kedzie I saw many federal agents, most of whom appeared to be from CPB including many BORTAC (“Border Patrol Tactical Unit”) agents. They were carrying assault rifles as pictured below:



I've learned what the different weapons are because I take photographs of the weapons and then I research what they are.

9. I walked over to Pershing and Kedzie I did not see any Chicago Police Department Officers there, just CPB agents and agents who may have been with ICE.
10. The federal agents faced off against civilians at Pershing in a line. I found the federal agents' appearance and demeanor to be menacing and intimidating.
11. I walked through the alley to the east of Kedzie down past 39th (in the middle of Pershing and 40th). 39th was blocked off as well.
12. There were lots of federal agents on 39th including those in clothing marked FBI and ATF. (Photo 2.)



13. I walked down to 40th and there was a line of Chicago Police Department ("CPD") Officers standing between the federal agents and protesters. I saw National Lawyers Guild observers there. There were about 75 to 100 civilians there. CPD officers did not have any gear to deploy or withstand tear gas. Federal agents had tactical gear, tear gas canisters, and assault rifles.



The scene became very tense.

14. Someone was holding a sign that talked about the “works of mercy” and the “works of war” and “treat others like you’d like to be treated.”



15. A bunch of tear gas was launched, multiple canisters. This is a residential area. Both the civilians and CPD dispersed quickly because they did not have any gear to withstand tear gas.



16. I walked north on Kedzie with civilians and CPD officers. I lost my goggles in the commotion so I could no longer take photographs because I was incapacitated by the tear gas. I tried to take photographs as I always do but they were not great.
17. When the smoke cleared, I walked to Kedzie and 40th. The crowd had dispersed. I saw the ICE Bearcat vehicle there that I had also seen at the Broadview facility which is very close to the entrance to the 290 expressway. Other protesters told me they had seen it speeding east down 290 earlier that day.



18. I kept walking to Kedzie and 39th and a federal agent in a vehicle (as shown below) dropped a flash-bang grenade 18 inches from my leg.



19. A masked federal agent, seen below, said, "You will be arrested if you stay here."



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:

05/10/2025

Date

Paul Goyette
Paul Goyette (Oct 5, 2025 15:35:08 CDT)

Paul Goyette