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**DECLARATION OF AMANDA YARUSSO**

I, Amanda Yarusso, do swear or affirm under penalty of perjury:

1. I am an attorney. On September 26, 2025 I went to the Broadview ICE detention facility in order to try to visit clients detained there. Another attorney, Brad Thomson, met me there.
2. I was not in the area to protest.
3. I arrived around 7:30 p.m. I was waiting on the Harvard side when ICE deployed a canister of some kind and pepper balls.
4. After Brad arrived, we went to the Beach St. side of the facility. Brad loudly announced that he was an attorney there to visit clients in custody. We were met by agents at the gate, and we were told to wait while agents checked with "management."
5. The agents told us there was nowhere in the facility for us to meet with clients and the conditions would not allow for us to come in. We begged them to let us in.
6. Eventually the agents seemed to be ignoring us entirely.
7. We proceeded back to the Harvard side of the facility to speak with agents there.
8. On the Harvard side, people were protesting ICE and saying things like "shame on you."
9. ICE agents then deployed pepper balls into the crowd. None of the protesters had done anything violent or threatening. They were just speaking their minds.
10. I heard an agent say something like "That's enough!" in response to the protesters as agents were using pepper balls on the crowd.
11. We went back to the Beach side of the facility to try to inquire about clients again.
12. Each time we approached the ICE facility to inquire about our clients, the use of chemical weapons made us nervous. We were trying to choose safe times to approach but it was nearly impossible to do so because ICE agents were using pepper balls and other chemical weapons completely unpredictably and without warning.
13. Although we were there for several hours, we never got into the facility to see our clients.

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

DocuSigned by:



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Amanda Yarusso