

### DECLARATION OF WILLIAM PAULSON

I, William Paulson, declare as follows:

1. My name is William Paulson. I am 67 years old, and am competent to make this declaration. I reside in Chicago, Illinois.
2. I am a retired union painter. In my retirement, I am pursuing higher education. I expect to graduate from the City Colleges of Chicago with an associate degree in December. I plan to begin studies at a four-year university in the spring.
3. I have attended protests and picket lines for many years. When protesters are face-to-face with law enforcement, I try to stand away from the front lines and to take an observing position.
4. In September 2025, I learned about the continuing protests at the ICE detention facility in Broadview, Illinois. I decided to travel there to protest. I wanted the people who were being taken and held at the ICE facility to know that people cared about them. I wanted to let it be known that the country didn't agree with the way that ICE had pulled people off the streets, thrown them into cars, and harmed them. I believe that ICE agents are not following the rule of law and am afraid that everyone will be in danger if no one speaks up. I wanted to express those beliefs and bear witness to the actions of federal agents at the Broadview facility. I wanted to appeal to the humanity of the federal agents at the facility and express that what they were doing was wrong on a moral basis.
5. I first traveled to the ICE detention facility in Broadview on Friday September 26, 2025. I arrived around 6 pm and approached a tall gate near the Lexington Street side of the facility. Nothing was happening there, so I eventually joined two other protesters who were going to the other side of the facility on Harvard Street and Beach Street, where I arrived around 7 pm. We stood on the streets, sidewalks, and grass. There was a gate there that appeared to serve the businesses on the other side as well as the ICE detention facility.
6. During the next hour, I noticed vehicles driving through the area fast and recklessly. I could see that there were officers inside the cars who were wearing uniforms I had seen on ICE officers. The cars passed through the gate. Other protesters and I chanted at the cars as they entered.

7. Around 8 pm, I noticed a Black man with a speaker approaching the Harvard Street side of the facility. He was followed by a group of protesters chanting “Whose streets? Our streets!” The protesters occupied the street. Suddenly, I heard the sound of whistles blowing. I noticed law enforcement agents in military fatigues approaching the protesters. I believe they were ICE agents.
8. I saw the agents in military fatigues tackle a man to the ground, very hard. Those agents formed a circle around the man they had tackled and then backed up in the direction of the ICE facility. The protesters followed the agents, but generally kept a distance of around 8-10 feet.
9. The agents retreated behind a tall fence. Minutes later, I noticed the agents in military fatigues behind the fence lobbing tear gas cannisters at the protesters from behind the fence. The first canister landed directly in front of the fence. The second canister landed right next to me. I was standing about 25 feet away from the fence and was trying to maintain a distance away from the other protesters.
10. The agents did not give a dispersal order or any other warnings or orders before throwing tear gas at me and other protesters.
11. I observed no sign of violence or other provocation by the protesters when the agents lobbed tear gas cannisters at the protesters.
12. I returned to the ICE detention facility in Broadview on the Lexington Street side of the building around 6 pm on September 27, 2025. When I arrived, I saw nearly four or five times as many agents as I had the previous day. They were mostly dressed in green uniforms with Customs and Border Patrol insignia. Some of the agents were dressed in camouflage fatigues like I had seen the day before, and some had ICE markings on their uniforms.
13. Between 6 pm and 8 pm, I saw agents emerge from the gate on at least two occasions. Each time, the agents easily cleared the streets and were able to proceed. During one incident, I saw agents violently tackle a man and arrest him. I heard other protesters screaming “what are you doing that for?” During another incident, I saw the agents confiscate what looked like signs, pieces of boards, and umbrellas, and load them into a vehicle.

14. Throughout the protest, protesters chanted things like “this is what democracy looks like” and yelled questions at the agents.
15. Around 8 pm, agents again approached the fence. As usual, I was standing away from the front. I was moving in between the street and the sidewalk, trying to see what was going on at the gate from a distance. Other protesters were in the street and on the sidewalks. I assumed I would be safe where I was because I was a good distance away from the gate where agents were massing. Before the agents approached, the protesters had been chanting “we love you” in support of a family member or friend of a detained person. A Black man with a speaker had been leading the protesters in chants.
16. I then saw the gate open and agents started to come out. I thought that, like on the prior occasions, the agents would proceed down the street and clear the street. I could hear that the agents were saying something, but it wasn’t loud enough for me to hear. I heard other protesters yelling “we can’t hear you!” Then, all of a sudden, I saw gas canisters shooting over my head.
17. Because of how the street had been blocked off, there was only one way to exit when the gas canisters were shot—by moving backwards towards Lexington Street. But the gas canisters had been shot in front of and behind me. I started to inhale the gas, and I couldn’t see or breathe. Around me, I could hear people being tackled to the ground.
18. Then, flash bang grenades started to go off near me. I was disoriented. I couldn’t see what way was up or what way I was going. Someone grabbed me to try to pull me out of the gas. My eyes and nose were burning.
19. I was eventually able to cross the street at Lexington. I fell to all fours and threw up. My eyes and nose were in extreme pain. My skin was burning. I have emphysema and COPD, so the gas affected me very strongly.
20. The gas drifted to the intersection where I was recovering, and I had to retreat further. I got to a grassy area further down the street and lay down. Some strangers helped me by flushing my eyes with water.
21. I never heard or observed any orders to disperse on Saturday, September 27.

22. On both September 26 and September 27, nearly all of the federal agents I saw were masked. On September 27, I recognized an unmasked agent who I have come to identify as Greg Bovino. None of the agents I saw displayed names or badge numbers on their uniforms.

23. On Sunday, September 28, I returned to the Broadview facility because I wanted to prove to myself that I could return despite the harm I had suffered. I stayed only for a few minutes, and I felt afraid the entire time I was there.

24. I intend to return to the Broadview facility to continue protesting, but after being tear-gassed multiple times, I am unsure whether I can safely do so. I have seen a doctor and been prescribed medication for the injuries I suffered during the weekend of September 26 and 27.

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

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Date

Signed by:

*William Paulson*

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William Paulson