

DECLARATION OF MADELINE SULLIVAN

I, Madeline Sullivan, declare as follows:

1. My name is Madeline Sullivan. I am over 18 years old and am competent to make this declaration. I reside in Chicago, Illinois.
2. On Friday September 19, 2025, I came to the ICE facility on Beach Street in Broadview, Illinois around 6 pm to protest. I wanted to express that detaining people and kidnapping people off the streets is wrong and that people should be able to come to the United States for a better life.
3. I noticed a group of protesters in front of the ICE building. I observed four or five agents in army fatigues with gas masks on the roof of the building. There were more agents in army fatigues with gas masks on in the building's parking lot behind a fence and closed gate.
4. When I arrived, protesters were standing on the street and sidewalks in front of the facility, holding signs and chanting. The protesters chanted things like "immigrants are welcome here." I saw signs saying things like "no one is illegal on stolen land" and "free our neighbors." The protesters were peaceful, and the agents on the ground were separated from the protesters by a fence and gate.
5. I observed multiple journalists covering the protest, including a reporter from ABC 7 and someone who was streaming in Spanish. I also saw clergy kneeling and praying, and multiple legal observers wearing green hats.
6. During the first two hours or so when I was at the protest, agents intermittently opened the gate to the parking lot and came out to chase people in the crowd. The agents were wearing camouflage uniforms, dark army fatigues, long sleeves, pants, and black boots. The agents were wearing helmets and gas masks. None of the agents had badges, badge numbers, or names on their uniforms, and their faces were covered.
7. During one instance, I heard the sound of shooting, and noticed that agents on the roof were shooting pepperballs. I saw that some protesters were hurt by the pepperballs.

8. During another instance, agents shot pepperballs from the roof, and then other agents emerged from the parking lot. It seemed like the agents were just swarming and confronting the protesters. I saw a female-bodied person holding a sign and chanting before she was grabbed and shoved to the ground by multiple agents. I didn't see her do anything aggressive or that would provoke an arrest.
9. Next, there was a lull where I didn't notice much activity. Then around 8 pm or 8:30 pm, out of nowhere, I noticed canisters coming from the directions of the agents that exploded with a flash of light. There were colorful sparks and loud noises. Suddenly, there were clouds of tear gas. The flash bangs and tear gas were totally unexpected. I was never told to leave or disperse, and I never heard anyone being told they had to leave. The federal agents' response escalated seemingly out of nowhere.
10. Because of the tear gas and flash bangs, I was really disoriented. I inhaled a lot of tear gas and had trouble breathing. I was helped to a grassy area and was able to get my inhaler. I started throwing up. My inhaler didn't help me.
11. At the time, I didn't notice any injuries. I was feeling a lot of adrenaline from the sudden attack on me and other protesters. Since that day, I have experienced recurring pain in my back and neck.
12. I left the protest. The next day, when my pain didn't get better, I went to the emergency room. I later visited my primary care doctor. I was prescribed a steroid and painkillers, and have suffered from consistent pain since I attended the protest.
13. I would like to continue protesting at the Broadview facility. I am concerned about getting hurt if I return, but I also don't want to stop protesting. I am afraid that I will be attacked by federal agents without warning again if I return.

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

Date

Signed by:

Madeline Sullivan
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 Madeline Sullivan