


DECLARATION OF MONICA BRESLIN

1. I am over the age of eighteen and have personal knowledge of all matters contained in this Declaration.
2. If called to testify as to the contents of this Declaration, I would be competent to do so.
3. I am a resident of Lake County, Indiana and work in Cook County, Illinois. Since approximately September 20, 2025, I have been regularly attending protests and demonstrations at the Immigration and Customs Enforcement (“ICE”) detention facility located on Beach Street in Broadview, IL.
4. I first came to the ICE detention facility in Broadview because I saw female protesters being violently attacked outside the facility on TikTok and wanted to support protesters’ First Amendment rights.
5. I have seen first-hand the violence against peaceful protesters and members of the press over the past week and a half, including the use of tear gas, pepper balls, and what appeared to be flash bangs.
6. On or about Friday, September 26th, I witnessed agents pointing tasers at the news media.
7. On Saturday, September 27th, I arrived at the ICE facility on Beach Street at approximately 6:00 PM.
8. There were approximately 150-200 protesters standing on the street peacefully chanting common protest chants like, “whose streets, our streets.”
9. Around 7:00 PM, I saw agents charge at least two people and tackled and arrested them. Agents then retreated back behind the fence.
10. I saw five agents stationed on the roof and a large camera pointing towards the protesters.
11. Approximately one hour later, protesters were chanting to “free Isaac,” someone held inside the facility, and people present who knew someone inside the facility were invited to the microphone to speak.
12. Shortly thereafter, approximately 30-35 agents lined up in front of the fence in full military uniform with gas masks on. I was in the first row of people on the street in front of the fence. I could see a large Department of Homeland Security armored vehicle behind. They were calling out orders, but no one could hear them. I yelled loudly that we couldn’t hear them, to repeat the order.
13. Moments later, agents opened the gates and I saw them push a woman to the left of me. Then they began gassing people on the street indiscriminately. I ran away to my car, which was parked on Beach Street, to try to escape the gas. While I was running, I was hit in the back of my left calf with what I think was a pepper ball.
14. I got into my car to escape the gas, but an agent opened my car door and forced me to get out. I told the agent that I couldn’t breathe, but they forced me to leave my vehicle.
15. I left my vehicle and walked away from the gas so that I could breathe.
16. When I tried to return to my vehicle around 9:30 PM so that I could drive home I saw that the intersection of Lexington and Beach Streets was entirely blocked by agents, and I could not access my vehicle.

17. Agents told me that in order to get to my car I had to consent to a search. A female agent did a full pat down and two agents walked me to my vehicle. I was told that if I did not consent to a search of my vehicle, it would be towed. I did not feel like I had a choice not to have my vehicle searched since I did not want to get towed. I started to panic and asked for there to be a witness for the search. Agents did not allow me to have a non-agent witness the search.
18. After my vehicle was searched I tried to find another place to park but was having difficulty. I decided to drive home
19. I have had flu-like symptoms since I was exposed to the chemical agents on Saturday night, September 27th. I have been sleeping a lot, vomiting, experiencing chest tightness. The back of my throat and my tongue are burning, and my mouth is irritated every time I try to eat or drink. I've also been feeling very anxious since this happened.

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 October 1, 2025.

Signed by: 
8B5DC434B5E543A...

Monica Breslin