

DECLARATION OF MATTHEW KAPLAN

I, Matthew Kaplan, declare as follows:

1. My name is Matthew Kaplan. I am 70-years-old and competent to testify. I reside in Chicago, Illinois.
2. I grew up in Whiting, Indiana which is across the state border from the East Side neighborhood of Chicago, Illinois in the far southeast corner of the city. I am very familiar with East Side and have gone there often throughout my lifetime. I have been very involved in documenting environmental and social justice groups in the East Side. Also, my elderly mother still lives in Whiting and I go there frequently to care for her.
3. I am a professional photojournalist and documentary photographer, and I have also worked for 40 years as a corporate meetings and events photographer.
4. I have documented the Calumet Region, including the East Side, for decades. In the last ten years, I have been very active in that region through documenting environmental justice activities. A lot of the same people who have been fighting for clean air and water are now concerned about their neighbors being targeted by federal agents for their race or immigration status.
5. For the last five weeks, I have been to the Broadview Ice Detention Center almost every Friday as a documentary photographer. On one occasion a federal agent shot me with pepper ball bullets at the Broadview facility. I have been tear gassed there as well.
6. On Tuesday, October 14, 2025, I was outside Gallistel Language Academy and someone driving by yelled that things are “going nuts” by 105th Street and Avenue N. So I ran there. I seemed to be the first photographer there. I started taking photographs just after 11 a.m.
7. I could see that I arrived after a crash between a white Customs & Border Patrol SUV and a red car. I saw the red car and white SUV were very badly damaged. The below photo is what the scene looked like when I arrived: IMG6021

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8. I climbed up on a porch and looked down to count about 50 federal officers on the street and there were more in cars around the fringes of the crowd. There were also about 50 civilians. A lot of the agents had patches that said U.S. Border Patrol or BORTAC. They wore fatigues, face masks, and hats and were heavily armed.
9. The residents were upset as a car crash and chase had just occurred in their community, causing a lot of stress right outside their homes.
10. The federal agents were heavily armed and civilians were expressing frustration and fear. Even though I had been at Broadview several times, I had never experienced anything like the scene in the East Side neighborhood. It was jarring to see this scene unfold right in the middle of a neighborhood, especially one that I have come to care for so much. I've never been in a situation like that.
11. For about an hour, people were standing around and watching the agents from the street, porches, and windows. Some were verbally criticizing the agents. This photo shows an example of how people were standing around. IMG 6247:

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12. Some people came out with flags from Mexico and other flags I didn't recognize, like in this photo. IMG6256.



13. After about an hour, the CPB agents launched tear gas. I heard no warning or dispersal order.
14. I watched as a CPB agent pointed a gun at an older man with a phone. The picture below captures that moment. I am very proud of this picture. I think it captures the dynamic of the day - community residents with only phones standing before heavily armed federal agents. Img 6322



15. There was no communication towards the crowd from anyone who seemed to be in authority with the federal agents. I never heard them say, "back off," "watch out," "stop this or this will happen," or anything like that. For the most part they were silent.
16. Chicago Police Department Officers were dealing with the accident on city streets and the paperwork. Eventually, tow trucks came in to tow out the cars without any trouble except that streets were by now clogged with cars and people.
17. A lot of federal agents were gone by then, but a line of them stayed and faced down 105th from Avenue N. Civilians continued to express their pride with flags and their anger through swear words and middle fingers as shown in this photo. IMG 6416:



18. More and more agents began to put on gas masks. Three people were arrested by federal agents including one who had held the Mexican flag above. I'm not sure what provoked the arrests.
19. A group of CPD officers filed in and stood in a line between the protesters and the federal agents.
20. All of the sudden, the federal agents launched many canisters of tear gas into the crowd. It seemed like the federal agents were using the tear gas like a smoke screen all along 105th Street to cover the withdrawal of their last agents and cars. The federal agents also pointed weapons into the smoke which was jarring because it didn't seem they would be able to aim properly in that cloud of tear gas.



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21. Again the federal agents did not issue any warnings or instructions to leave or back off. CPD officers were caught in the tear gas too.
22. As shown in this photo, an agent threw a tear gas canister towards me and another obvious photographer. No agent warned us or told us to get back or leave. IMG6659.



23. I got caught up in the tear gas and could no longer take photos. I was blinded and coughing badly. I stumbled away, falling to the ground. People came with water and washed my eyes out for about ten minutes. There had never been any kind of a warning. When the tear gas had cleared the federal agents were gone and everything was quiet.

24. The violence and tear gas from federal agents will not stop me from recording these events. I am older and a U.S. Citizen. I feel I can and should risk my own safety in the effort to document these incidents. But I worry a lot about younger observers and protesters. I've told some of the young people I know that, from what I've observed, the federal agents could hurt them badly. I tell them these federal folks are not like the CPD, they don't seem to care about you or your rights. I've told younger people to be very careful.

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.

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Executed on:

10/20/2025

Signed by:

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Matthew Kaplan