

Declaration of Arely Barrera

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 Chicago, Illinois, on the Northwest side of the city.
4. I am concerned about the impact ICE and other federal law enforcement is having on my community.
5. On September 18, 2025, I learned that federal immigration agents were present and active on Kostner Avenue in Chicago, nearby the intersection of Grand, North, and Kostner.
6. I drove there in my vehicle and parked approximately 50-100 feet away from the agents, in a parking lot across the street. When I arrived, I took photographs of the ICE officers.
7. My purpose in taking these photos was to create greater accountability for ICE actions in the city, and to convey that they were being watched and would be held responsible for any constitutional or other legal violations.
8. I never impeded officers and I was 50 to 100 feet away from them.
9. After seeing me taking photos, some of the federal agents drove across the street to the parking lot where I was parked. They drove and parked their vehicle behind mine. I was blocked in because I was in a parking space.
10. Federal agents aggressively approached my car from their Ford Explorer that had no license plates at all, on the front or back. They had flashlights and cell phones, and they appeared to be using their phones to photograph and film me.
11. I began filming their actions. Eventually, the agents left.
12. The interaction scared me. I am afraid to record ICE and other federal immigration law enforcement agents based on how I was treated. I was not following the agents and had done nothing to interfere with them when the agents blocked me in and started filming me.
13. I intend to continue to respond to the actions of ICE agents to record and document information about their actions, but I am afraid to do so.

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 10/20/2025.

DocuSigned by:
Arely Barrera
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