

DECLARATION OF REVEREND ABBY HOLCOMBE

I, Reverend Abby Holcombe, make the following declaration based on my personal knowledge:

1. My name is Abby Holcombe, I am competent to make this declaration.
2. I am an adult resident of River Forest, Illinois.
3. I am a pastor at River Forest United Methodist Church (UMC) and Urban Village Church—West, in River Forest, Illinois.
4. I have been a commissioned Provisional Elder since June of 2024. I have been affiliated with the UMC since 2018.
5. Two Bible verses command me to care for immigrants. The first is Exodus 23:9 (“You shall not oppress a sojourner. You know the heart of a sojourner, for you were sojourners in the land of Egypt.”). The second is Matthew 25:35 (“I was hungry and you gave me food, I was thirsty and you gave me drink, I was a stranger and you welcomed me.”).
6. As a United Methodist, I believe communion should be brought to those unable to physically receive it, including to anyone in physical detention, like those incarcerated at the Broadview, Illinois Immigration and Customs Enforcement (ICE) detention facility.
7. I first attended a protest outside the Broadview ICE facility on September 5, 2025. My faith called me to show up for migrants being detained at that facility and to speak out against the inhumane conditions. My faith and particularly the United Methodist Church condemn inhumane conditions and calls us to treat foreigners as our own.
8. While unsure at first, one Scripture catalyzed me to go, Isaiah 61:1 (“The spirit of the Lord GOD is upon me, because the LORD has anointed me to bring good news to the poor;

he has sent me to bind up the brokenhearted, to proclaim liberty to the captives, and the opening of the prison to those who are bound....”).

9. I attended this protest wearing my clerical collar, which I typically wear to preach, and which I wore to all protests I attended at Broadview. I was fulfilling my role as a minister and bearing spiritual witness to those detained at the Broadview ICE facility alongside a multi-faith coalition of ministers. We sang songs, chanted, and engaged in several religious actions.

10. The crowd’s morale was very high. It felt like a celebration more than a protest.

11. At one point, a minister initiated a Jericho Walk. This is a form of worship taking after a pivotal moment from the Book of Joshua. *See* Joshua 5:13-6:27 (New International Version). Jericho Walks symbolize God’s promise to God’s people, that all obstacles will be removed through prayer and faith.

12. During this particular Jericho Walk, members of the clergy were praying and instructed protestors to shout, as they did in the Book of Joshua.

13. I attended another protest at the Broadview ICE facility on September 19, 2025. That morning, I heard that there were arrests, tear gas deployed, and people shot with rubber bullets. As my faith calls me to do, I attended the protest to provide spiritual comfort and healing for those protestors who had been affected. I was wearing my clerical collar.

14. Morale was markedly lower on this day as people were tired from being tear-gassed. I witnessed protestors catching their breath further back from the facility because they were hit with tear gas. The excitement that I experienced from the first protest was gone.

15. I joined a group of clergy who sang explicitly religious hymns.

16. On this day, it was difficult to pray with or near protestors because of the tear gas that had been deployed and the projectiles that agents had been firing at protestors. Had some

people asked me to bless them, I would not have been able to lay hands on them because they were covered and soaked in chemical agents.

17. I offered a spiritual presence to the protestors. Many expressed they were grateful for that. I prayed for the souls of the protestors. One person was surprised to see clergy standing for justice, and I was able to discuss how my faith requires me to stand for immigrants. I wanted God to see that their protests were devotion and consistent with the Bible's message.

18. I also began praying for the souls of the ICE agents, whose acts went against the Bible and God's command to treat migrants well. I prayed for their redemption. I audibly preached, "love your neighbor, love your God, save your soul, and quit your job." This was my way of leading ICE agents to redemption. I was near the Broadview facility's gate.

19. One ICE agent—perched on the Broadview facility's roof—began shooting projectiles at me out of some type of gun as I prayed for him. No other person was shot at. I was on the road, not interfering with their duties. Nor was I obstructing their ability to use the facility. I was near some other protestors but was alone in being shot at.

20. In the chaos, I was not sure if I had been hit. But I was sure that multiple shots had been fired in my direction and that there was a shower of projectiles that hit the ground immediately around me. I remember looking down and seeing multiple projectiles on the ground near where I was standing, and the shooting forced me to do a little dance to avoid being hit by the projectiles. I was shocked that I was singled out for mistreatment while I was obviously ministering. I discontinued praying over the ICE agents. I left shortly after because I felt traumatized and unsafe.

21. I've been to numerous other protests, including some while in my clerical collar. I joined Black Lives Matter protests in Birmingham, Alabama. None were like this. This protest had the worst violence that I've been subjected to.

22. On October 10, 2025, I was again outside Broadview. On that day, roughly 17 faith leaders across denominations gathered to preside over communion, facing the facility. We stepped over the "free speech" barrier at Harvard Avenue and 25th street as clergy bearing communion. At that point, Illinois State Police troopers stopped us from processing. I was again, wearing my clergy collar.

23. I spoke to the troopers, I told them we were clergy and that we wanted to bring communion to congregants inside the Broadview ICE facility.

24. A trooper with the Illinois State Police (ISP) pulled our communion group aside and said he would call a person inside the ICE facility to clear our entry. After five to seven minutes, that ISP trooper returned and informed our group that a federal agent Hernandez told him that "no one is allowed to approach the gate." We were turned away. This exchange was caught on video.

25. The violence from the agents has impacted my congregation. Multiple congregants, and fellow clergy, have told me that they would not travel or return to Broadview to protest because of the fear of violence. Their fear is understandable, and it is unfortunate that people of faith have been deterred from making their voices heard by agents' violence at these protests.

26. The use of tear gas on and the firing of projectiles at the protestors, including clergy, combined with an ICE agent targeting me for mistreatment, has traumatized me personally as well. Because of the risk of physical violence complicates planning for attending protests, I have had to scale back the ministering I would have otherwise done. I had to make

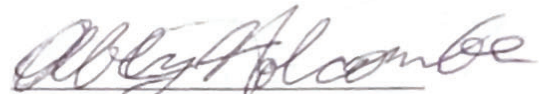
arrangements in advance for friends and family members to be ready to help me in case I was injured, which makes it harder to attend protests. These events have therefore deterred me from visiting the Broadview ICE facility and worshipping with my peers as much as I would have wanted to. Because of that, I am unable to care for all of God's children who seek spiritual guidance outside of Broadview. I am also unable to deliver communion to detainees.

27. Nevertheless, I serve God. I plan to continue my religious exercise at the Broadview ICE facility as much as I'm able. I plan on comforting the injured, praying for ICE agents' redemption, and joining other spiritual leaders and their congregations to protest inhumane conditions inside at the Broadview ICE facility, all of which my faith commands me to do.

28. I understand that this is a class action, and I understand my responsibility as a class representative. I am interested, willing, and able to represent the interests of other clergy whose faith called them to protest the inhumane conditions at Broadview, but whose religious exercise has been substantially burdened.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 10/20/2025


Reverend Abby Holcombe