

DECLARATION OF JOSELYN WALSH

I Joselyn Walsh, declare as follows.

1. I am an adult resident of Chicago, Illinois. I have personal knowledge of the facts set forth herein and could competently testify thereto.

2. On Friday, September 26, 2025 at around 7:00 a.m., I arrived at the Immigration and Customs Enforcement (ICE) facility in Broadview, Illinois to protest against ICE's enforcement actions in Illinois. I joined about 60 other people at 25th Avenue and Harvard Street, a number that grew throughout the morning.

3. Between 25th Avenue and Beach Street, Harvard Street turns into something like an alley parking spaces on either side. A large gate blocks access to Beach Street from Harvard Street. I was standing at the side of the road on Harvard a near 25th Avenue, playing my guitar and singing. I could see the closed gate and what I assumed to be ICE agents on the other side. People were gathered in the street.

4. At some point, an ICE vehicle entered Harvard from 25th. A bunch of protesters tried to stand in a line across Harvard to block the vehicle. The vehicle kept driving slowly forward and pushed some protesters closer to the gate. When the vehicle and the protesters were about halfway down the block, ICE suddenly started spraying pepper balls into the crowd. There was a lot of gas in the air; I could feel it up at 25th Avenue. I felt burning in my throat and eyes, and I had to take a break from singing because it was too hard to take a breath. The vehicle made its way to the end of Harvard.

5. For about an hour, people were sitting and milling around the grass at 25th and Harvard. Then some people decided to sit in a line about halfway or two thirds of the way down

Harvard, about 30 yards from the fence. My group was singing on the right side of the road, near the people who were in the line. We sang for quite a while.

6. Around 9:00 a.m., a group of cars from local businesses started driving out through Harvard to 25th Avenue, and the crowd allowed them to pass. Then ICE started firing pepper balls at us in a random fashion even though we were in the same spot where we had been for the past hour or hour and a half, just singing. I saw canisters thrown towards us. A flash-bang grenade went off right near me. Seconds later, a projectile that I believe to be a baton round went through my guitar, breaking it and striking my leg.

7. The photograph below shows my broken guitar and the projectile that went through it.



8. The photograph below shows the mark the projectile made on my leg after it had gone through two layers of my guitar.




9. Agents continued to shoot randomly into the crowd, even though there were no vehicles going in or out of Harvard Street.

10. I walked up to 25th Avenue, where there were water bottles and snacks, and calmed down a bit with some friends. I left around 10:00 a.m.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 10/06/2025



Joselyn Walsh