

Declaration of Stephen Held

I, Stephen Held, declare as follows:

1. My name is Stephen Held. I am 53 years old and am competent to make this declaration. I reside in Chicago, Illinois.

2. I am a co-founder and reporter with Unraveled Press.

3. In addition to my reporting efforts at Broadview described in my prior declaration, I have been reporting on the actions of federal law enforcement agents conducting immigration enforcement and their interactions with the public throughout the greater Chicagoland Area.

4. Since May 2025, I have regularly reported from the primary immigration courthouse in Chicago, located at 55 E. Monroe St., and the satellite courthouse at 536 S Clark St. The primary courthouse sits in leased space on the 15th floor in a mixed commercial and residential building. The satellite courthouse is in a federal building, which is also referenced by the street address 101 W. Ida B. Wells and shares space with the Chicago ICE field office.

5. From immigration court, I reported on ICE's pattern of dismissing pending removal proceedings, moving for expedited removal, and arresting people inside the courthouse immediately after dismissal of their case. The first day I observed this tactic was May 23, 2025, and I returned to the immigration courthouse to report on protests and courthouse arrests throughout the summer.

6. On one occasion, on June 4, 2025, ICE agents waited outside of a courtroom. A tall Black man walked out of the room. At least two agents approached him from either side and told him to come with them, but they stopped when the man told the agents that he was a courtroom interpreter. The ICE agents retreated and waited for another tall Black man to leave the room, who was then arrested and detained. I witnessed his wife, in tears, trying to explain that they were making a mistake. On June 30, 2025, I learned from a Chicago Tribune story titled "A mistake by ICE put her husband in jail. She got him back 3 weeks later," that the man was in fact taken by mistake and wrongfully spent three weeks in a Louisiana jail.

7. Most people attending court did not have legal counsel. However, on several occasions, as ICE agents detained people at the courthouse who had retained counsel, I observed immigration attorneys asking ICE agents questions about removal orders and administrative warrants. The attorneys were told by the agents that they did not have to show any paperwork,

that the attorneys were “interfering with law enforcement,” and if they continued asking questions they risked arrest.

8. After a couple weeks of reporting on detentions at the immigration courthouse, on June 4, 2025, protesters began gathering outside of the building.

9. After this, protesters regularly gathered outside of the immigration courthouse building almost daily. I was there almost every day, along with my colleague, Raven Geary, and other independent journalists, to report on the protests and actions in the courthouse. The protests largely gathered outside of a delivery garage entrance where officers parked their vehicles and drove detainees out of the premises.

10. On at least two occasions, the judge in charge of immigration court chose to close court early in response to protests outside.

11. On one occasion, on June 12, 2025, a protester was nearly hit by an ICE vehicle as she sat in front of the garage exit. I was not present at court this day, but it was photographed and reported by other journalists.

12. On June 16, 2025, as protesters gathered again in front of the garage entrance, masked ICE agents arrived in plain clothes, with some wearing tactical vests. The tactical vests were a notable difference from their attire up to that point. Agents shoved and struck the protesters, many of whom were young women. I watched agents tackle some to the ground. I witnessed at least one agent kneeling on the back of a protester while handcuffing them.

13. Passersby on the sidewalk yelled at the agents. One man repeatedly asked them to identify themselves or to show a badge, which the agents ignored. The agents then put three handcuffed protesters into one of their vans, which they drove into the building’s secure delivery garage. They were eventually then transferred to the ICE Field Office at 101 W. Ida B Wells. None of the protesters were charged with any crimes.

14. Not long after the arrests, on foot, I entered the delivery garage after the door opened for a delivery vehicle. My intention was to see if the arrested protesters were still being held in the garage. Immediately upon entering the garage, at least two federal agents told me that I was trespassing on private property and that if I didn’t leave, I would be subject to arrest. I complied and left the building’s private garage.

15. Not long after, I went upstairs to the courthouse, and an ICE agent who I now know to be badge number #7880 saw me walking down the hallway. He came out of a small

office ICE sometimes used, got within inches of my face with my back pressed against the wall, and told me something I can best remember as: “Someday you and I are going to run into each other outside of here, and I’m going to remind you of this.”

16. That same day, my colleague Raven Geary told me that she was similarly threatened at the courthouse, when officer #7880 told her, “If anything happens to my guys, I’m holding you responsible.” He also encroached on her personal space.

17. Throughout my time reporting in immigration court, I frequently saw badge number 7880 in court, giving directions to the other agents. Later while reporting at ICE’s processing facility in Broadview, I saw the same agent giving orders. One of the days he was giving orders outside Broadview was the same day Geary was shot in the face with a pepper ball.

18. This agent frequently referred to me by name in immigration court, as did his fellow agents, security officers, and officers with Federal Protective Services. On several occasions, before the additional security perimeter was setup outside the Broadview facility, agent 7880 shouted my name from behind their security fence.

19. After the arrests on June 16, I continued returning with other reporters to report on protests, and to monitor ICE activity at court. Since that day, I have not witnessed ICE conducting any further arrests at the primary immigration courthouse located at 55 E. Monroe.

20. In addition to reporting on ICE activity and protests at the primary immigration courthouse, I frequently reported on protests and ICE activity from the satellite immigration court and Chicago ICE field office at 101 Ida B. Wells. On one day in early June, I also reported on ICE activity at 2245 S. Michigan. On that day, a large protest formed outside the building after ICE agents arrested around ten people who were instructed to check-in as part of their participation in the Intensive Supervision Appearance Program.

21. Since August, I have frequently reported on ICE activity and protests in Broadview, Illinois. Since September, I have reported on ICE and Border Patrol activity throughout the city and suburbs. On some occasions I have been able to get to the location of reported ICE/CBP activity during or immediately after a reported arrest or incident.

22. On October 4, 2025, I went to Brighton Park after seeing a social media post indicating that federal agents had possibly shot someone and that a crowd of protesters was gathering on Kedzie between 39th and 40th streets. I arrived shortly before 1:00pm and observed about 50 to 100 community members on the south end of the block gathered in front of at least

40 CBP agents lined up in tactical gear in front of a tactical armored vehicle. A red tape had been strung across Kedzie, creating a perimeter.

23. There were several feet of space between the officers and protesters, who were speaking, chanting, and shouting at the officers in a non-threatening manner. While I will refer to community members here as “protesters” for expediency, it should be clear that many of the people I spoke with lived nearby and were responding to the fact CBP shot an unarmed woman in their community. These were not people who had planned to attend a protest that day, and who generally did not have protective equipment.

24. Within thirty minutes of my arrival, several CBP agents put on gas masks and approached the front of their line with what appeared to be tear gas launchers. Based on my experience being gassed several times over the previous two months at Broadview, I put my gas mask and helmet on in preparation for the deployment of tear gas and other chemical munitions. The protesters saw the gas launchers and deescalated the situation by backing away from the officers, leaving at least 20 feet between the two groups.

25. Within 30 minutes, Chicago Police (CPD) showed up and replaced CBP agents along the police line on the south side of the block. The CBP agents fell back behind the police line towards their vehicles in the middle of the block. Protesters continued shouting and chanting at the agents and officers behind the police line. I did not observe any protesters throwing objects or otherwise inciting violence. The crowd grew to about 100-150 protesters on the south side of the block.

26. Around 2:30pm, I moved with some other reporters to the north side of the block to see what was going on. Approximately 20 to 30 CBP agents lined the north side of the block, and protesters gathered a few feet in front of them. The north side had no taped perimeter line. About 15 minutes later, CBP agents advanced forward to allow at least two of their vehicles to pull out. This was successfully accomplished without any physical conflict with protesters or deployment of chemical munitions.

27. Around 2:50pm, a couple dozen Chicago police officers created a line along the north perimeter, replacing the CBP agents who then withdrew. Approximately two minutes later, with no visible or audible warning whatsoever, CBP agents deployed a significant amount of CS gas, flooding the street. As I have observed on multiple occasions at Broadview, the officers threw and shot canisters of gas indiscriminately into the crowd without any apparent

provocation. None of the Chicago police officers, and few of the protesters, had gas masks or eye protection.

28. As people ran from the gas, several CBP vehicles sped eastward out of an alley in the middle of the secured block. I saw a bunch of people running east, so I and other reporters followed in that direction. I spoke with bystanders who told me that they witnessed CBP vehicles deploy tear gas out of the vehicles as they sped down the alley.

29. One person who was unable to open his eyes due to getting a large dose of one of their chemical munitions told me that the CBP officers threw gas canisters out of their car windows for at least a couple blocks in the neighborhood. I saw several kids playing outside in their yards nearby shortly before the gas was deployed and asked them and their parents if they were ok.

30. I walked back towards the north side of the blockade on Kedzie. By that point, CPD sent more officers to reestablish their north line. A large number of CBP agents and vehicles remained in the middle of the block. A half hour after their initial deployment of chemical gas, CBP again indiscriminately and without visual or audible warning deployed even more gas in the middle of Kedzie Ave. People scattered, as over a dozen CBP vehicles sped through the gas cloud north on Kedzie, nearly hitting people in the street with debris littering the road.

31. After both gas deployments, I observed several CPD officers gagging and coughing from the gas. Most of the protesters and other bystanders did not have any personal protective equipment. Though I was wearing a gas mask, I still experienced the now familiar sensation of tear gas getting onto my skin, and I was forced to retreat from the scene.

32. Roughly twenty-four hours after this incident, I began to experience nausea and dizziness. I went to an urgent care on Monday morning since I had never experienced this after previous gas exposure. Doctors ruled out any other obvious cause and symptoms diminished over the next day. Upon further research, I have learned that this is not an uncommon experience after exposure to tear gas and other chemical munitions.

33. I intend to continue my work in the Chicago area as a journalist including responding to scenes when I receive information that ICE or CBP agents are conducting arrests, acting aggressively toward neighbors or protesters, or deploying chemical munitions. I believe it is important that people see what is really happening to communities in the city and suburbs. A

lot of focus has been on Broadview, but the behavior of these federal agents more closely mirrors that of an occupying paramilitary force than a law enforcement operation, creating chaos and terror in our streets.

34. I am willing and capable of representing the proposed class of other journalists in this lawsuit who are all also covering the interactions of federal agents and the public and are facing similar suppressive tactics in the course of doing so. I have been and will continue diligently supervising the work of the attorneys I have hired to represent me.

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 20, 2025

Date



Stephen Held (Oct 20, 2025 18:01:58 CDT)

Stephen Held