

DECLARATION OF ASHLEY VAUGHAN

Ashley Vaughan declares as follows:

1. I have personal knowledge of the facts set forth herein and could competently testify thereto.
2. My name is Ashley Vaughan. I am an adult resident of Berwyn, Illinois.
3. I have a long history of participating in protests and I have received training in peaceful protest and de-escalation.
4. I have a neurological condition that limits my mobility and I use a mobility cane to assist with walking, sitting, standing, and leaning.
5. I wanted to voice my experience of unlawful and unjust activity occurring in Broadview, Illinois at the ICE detention facility, where a group of ICE agents, falsely presenting themselves as members of the military or police by wearing partial army and police uniforms, unlawfully and without warning targeted and assaulted me—a disabled individual—with pepper balls, pepperball projectives, and pepper spray during a peaceful, non-violent protest against the inhumane, illegal detention of individuals in my community in a condemned, shuttered, and abandoned structure that has been challenged by local fire and police.
6. On September 12, 2025, around 3:50 p.m., I arrived at a protest in front of the Immigration and Customs Enforcement (ICE) facility. I noticed white spatters all over the ground that I could not identify. Approximately 20 protesters were present. No one was vocally protesting, and I did not see any ICE agents. Everyone was sitting down with their blankets and signs. Snacks were available. The ambience was like a friendly gathering for a picnic.

7. The ICF building has a door in the center of the building. On the right side of the building (from the perspective of someone facing it from the street), is a gate that leads to a parking lot, and on the left side is a garage door.

8. At some point, I sat down on public property near where the sidewalk met the road directly in front of the garage. Others sat in a similar position in front of the gated parking lot.

9. At around 4:30 or 5:00pm, some officers came out of the gate to the parking lot. The vehicle made a hard left turn over some rocks and the sidewalk to get around the protesters in the street.

10. I continued to sit on the sidewalk or street in front of the garage with a few other people for some time. Some federal agents wearing camouflage and gear that looked like armor came out from the garage area. Some had pieces of what looked like costumes of police uniforms, mixed with street clothes and army gear. They all had their faces covered. Some had something on their hip that resembled a badge but had no words. Nothing on their uniforms identified them as being from any particular agency. I saw some of them carrying weapons that looked like paintball guns.

11. More people joined the protest. There were around 50. We were all just sitting and standing around. Some people were singing, drumming, and chanting. It was a peaceful scene. There were two or three officers standing on the roof directly above the garage. They were talking and looking down and pointing at us.

12. I was sitting on the sidewalk in front of the garage, next to some dumpsters that were lined up just to the left of the drive to the garage. At around 5:45pm, I was looking up at the agents on the roof, when I saw a red ball come toward my face from that direction. There was no warning. The red ball hit me between the eyes. I could not open my eyes. I tried to scramble

away, grasping for my cane, but I could not get up. People approached me to help me get up. The agents continued to shoot. Then they sprayed something on me, and I felt like my face was on fire. I still could not open my eyes. I could tell that I had a big hit on my head. Everything was burning. I could not see anything or open my mouth. People were calling for a medic but no one was coming. The ICE agents were only a few feet in front of us, and they kept pushing us back with pepper spray and pepper projectiles, until they could clear us out of the public street to bring in their illegally operating vans.

13. Then there were people trying to clean me off. I couldn't breathe; the people were helping me get the substance out of my mouth. Some of the pepper spray projectiles exploded upon impact, causing my wounds to get pepper spray inside of them, causing a deep burning pain that went on for days. Some of the ICE agents sprayed us with what looked like paint guns full of stronger pepper spray, and this also got into my eyes, mouth, lungs, and open wounds.

14. The photograph below depicts me being tended to by other protesters. The swelling on my forehead is visible as is a welt on my right upper arm.



15. Someone asked if I wanted an ambulance. The ambulance arrived, but it could not drive down Beach street. Some Broadview police officers had to escort me to the paramedics. My eyes were still closed. The paramedics got me in the ambulance, but they could not drive right away, because they were themselves overcome with the chemicals in the air and could not see. I was in horrible pain.

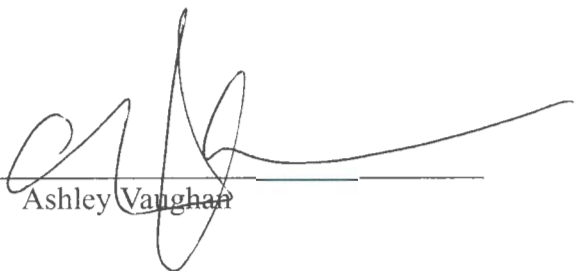
16. Finally, we arrived at the ER at Loyola Medicine in Maywood, and the nurses started cleaning me off, all of them coughing, some having to leave the room because they were being affected by the pepper spray. They did a CT scan on my head and chest x-rays. There is a possibility I blacked out/passed out when I was initially hit in the head. I was discharged with a head injury that they were treating as a mild concussion. They wanted me to check back in two days to make sure I was not having seizures or anything. In addition to the head injury. I had four large bulges and welts and many more bruises on my body where pepper balls hit me.

17. Three days later, I was still in a lot of pain, having some confusion and horrible headaches. I couldn't see well and there was swelling over my right eye. I had pain in both arms and could barely use my right arm. My ears were ringing. I still have the lump on my head that has not gone down.

18. This incident will not keep me from protesting. At the intersection of being a disabled protestor, it is critical to understand that these ICE agents were aware I was disabled and using a mobility cane. I was on site most of the afternoon and they already engaged with me. They knew I was disabled, shot me between the eyes, and when I couldn't get up fast enough due to my disability, they shot me down even more. Being assaulted by ICE as a disabled individual, and continuing to be shot while trying to get up with my mobility cane, is a cruelty in itself. However, it is nothing compared to the cruelty my community, neighbors, and friends are experiencing that are being detained and separated. Everyone deserves safety and respect, and I continue to protest for those being detained illegally by ICE. I have since returned to Broadview where attacks, weapons used, and threats by ICE on protestors have only escalated.

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

Dated: 10/5/25



Ashley Vaughan