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DECLARATION OF IAN SAMPSON

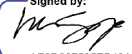
I, Ian Sampson, declare as follows:

1. My name is Ian Sampson. I am over 18 years old and competent to make this declaration.
2. On September 27, 2025, I went to the protests at Broadview Detention Facility.
3. I arrived there around 7:30pm.
4. I brought my camera with me. I am not a journalist, but I wanted to take pictures of the event.
5. A number of protesters and journalists had congregated in front of a large fence on Beach Street. I got close to the fence in order to take some pictures.
6. I observed a large number of officers behind the fence. Shortly after I arrived, the officers said something in the direction of the protesters and journalists, but I couldn't hear what they said.
7. Then the fence opened up and the officers started coming out.
8. It seemed like the officers wanted us to get out of the street so I stepped out of the street and onto the grass.
9. An officer pushed me further back. He said something to me, but I couldn't hear what he said.
10. It seemed like the officers wanted us to move further back, so I turned around and started walking further back.
11. Suddenly, I was violently pulled down by my backpack. I was dragged on the ground a couple feet.
12. Officers flipped me onto my front, and my arm was pinned under my torso. The officers yelled "stop resisting," but I wasn't resisting. I couldn't move my arm but was trying to cooperate. Eventually, they got my arm behind my back and handcuffed me.
13. An officer put his knee into my back. At one point, the officer's knee went into the back of my head, causing my head to be smashed into the ground. This caused a small chip in my tooth. My head was also bruised.
14. I noticed tear gas all around me, and I felt like I couldn't breathe. I felt the tear gas in my sinuses throughout the rest of the evening.
15. The officers then picked me up and walked me into the facility. I sat on a bench while they processed me. I had my fingerprints taken, a DNA swab taken, and I was asked if I wanted to waive my *Miranda* rights.
16. I was held in a jail cell for about five hours. I was eventually released around 1:30 am.
17. No criminal charges were filed against me.
18. I intend to continue going to protests, but I am fearful that I might have a similar experience in the future.

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

Date

Signed by:


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Ian Sampson