

**DECLARATION OF JAYMI RAAD**

Jaymi Raad makes the following declaration:

1. I am a resident of River Forest, Illinois over the age of 18. I have personal knowledge of the facts set forth herein and could competently testify to them if called upon to do so.

2. On September 12, 2025, I went to a protest at the Immigration and Customs Enforcement ("ICE") facility at 1930 Beach Street, Broadview Illinois.

3. The boarded-up building has a garage door on the left (south) end of the building, and a heavily gated parking lot on the right (north) end of the building. This is in an industrial area near the end of a dead-end street (going south), but ICE agents used a large, gated lot at the south end of the street that their vehicles could cut through to come and go from 25th Avenue.

4. When I arrived at about 4:15pm, approximately 20 people were there. Most of them were sitting on the curb in front of the building. Some people had lawn chairs or picnic blankets, and a few were standing. Many were praying, reading, or talking quietly. There were some tables set up in front of the building, on the grass between the sidewalk and the road, with things like snacks, sunscreen, and bottles of water. The atmosphere was calm and friendly.

5. Some of the people there told me about incidents at that protest earlier in the day that included agents pushing protesters and at one point shooting pepper balls into the crowd. As they said this, the people pointed at two or three white spatters on the road.

6. Once or twice I saw several federal agents appear on the roof, followed by about a dozen agents who came out through the garage door. The agents were masked and dressed in camouflage clothing, although the styles of camouflage were different, as were the markings on their clothing and tactical gear. At least some of them were armed. They were terrifying. I could

not tell from their uniforms what agency they were with, but I assumed they were ICE agents. The agents formed a line across the street, blocking protesters from the garage and the large parking lot at the end of the street as vehicles drove to or from the garage. A drone flew overhead.

7. A little before 5:00 p.m., a Latina woman went to the door of the building with two garbage bags of things to give to loved ones inside the facility. Over the course of about half an hour, she was talking through the door with agents. Eventually they took the bags from her and returned a little later with a small bag of possessions that the detainees had asked them to give her. The entire interaction occurred with the doors closed or only very slightly ajar, and with armed agents on the roof.

8. By the time the woman with the bags left, the crowd had grown to perhaps 75 people. The vast majority of them were spread out on the street or across the street from the building. Some were sitting, most were standing, and all were peaceful. Among them were a clergy member with a collar, two legal observers, and a man who referred to himself as “Rabbi” who was setting up on the sidewalk for a gathering that was to occur at 6pm.

9. There were a handful of people standing in the short driveway to the garage door, shouting up at the agents who were on the roof directly above the garage door.

10. I approached a woman standing directly across the street from the garage door and offered to help her hold her “COEXIST” sign. I began leading chants that I had heard at other protests. Others followed my lead, and the Rabbi used his bullhorn to start leading similar chants when I took breaks for my voice.

11. At some point, the garage door opened, and a group of ICE agents walked out, at least some of them wearing gas masks. Almost immediately—within two or three

seconds—without any dispersal order or warning they began shooting what I assumed were pepper balls point blank at the people in the driveway, including a woman I later learned was named Ashley Vaughn. Ashley, who uses a crutch to walk, was sitting on the sidewalk.

12. Most of the protesters ran away, but Ashley could only crawl as the agents continued shooting at her. One man turned back to help Ashley as she was trying to stumble away on her knees. He and another woman helped her to her feet and across the street to the area where I was standing. The agents followed them, surrounding them from behind and on both sides. They continued to shoot at Ashley and her helpers as they retreated, and one of them raised a spray can over her head and pointed it downward, spraying something all around them.

13. When Ashley and the two other protesters got across the street to us, people helped Ashley to the ground. As agents began walking from the driveway out into the street I walked over to the table with the snacks and drinks and grabbed some water bottles. When I turned back the agents had created a line across the street north of the garage, between me and the small group with Ashley. The agents began to go back into the facility, and I was able to bring the water back to Ashley.

14. Ashley had her eyes closed. She said that they hurt badly and she was afraid to open them. She had a bump on her forehead with slight bleeding, and another on each arm, also bleeding. She was covered in white powder. We used the water bottles to clean as much of it off her as we could. It got all over me as well. My face felt like a sunburn, and I had some difficulty breathing. I asked Ashley if she would like us to call an ambulance for her, and she said yes. Someone called the ambulance while others of us continued to clean her up.

15. I could hear several people clearing people off the street so the ambulance could get through, but in the end, only the police drove up to us. The ambulance stayed parked at the



end of the block and the paramedics walked to us. As I stepped away so they could help Ashley, I realized that the federal agents were no longer blocking the street. The paramedics took Ashley to the ambulance on a stretcher.

16. I decided to go to the hospital so Ashley wouldn't be there alone. As I was gathering some of her belongings that she had left behind, an automated message blared that this was federal property and we needed to leave or they might use force, potentially including chemical weapons. This was the first and only time I had heard such an announcement since I had been there.

17. As I walked to the North end of the street where my car was parked, I encountered a group on the grass surrounding the man who had helped Ashley off the sidewalk. That man had also been shot repeatedly and completely covered in white powder but opted not to go to the hospital. The group had helped him clean up, and he was able to open his eyes. As I approached, he was standing up and saying he felt okay.

18. At about 6:30 p.m., as I was walking away from that group and approaching my car, I saw federal agents on the roof of the building, shooting down into the crowd on the street, which had dwindled to about half what it had been previously. I got in my car and drove to the hospital.

19. At the hospital, I found Ashley. She had been cleaned up and her eyes were open, but the mark on her forehead had grown significantly. Almost immediately the nurses said there were more people arriving from the protest, and they started asking me questions so they could be prepared. Around 7:00 p.m., the ambulance came, and two other people were brought in, covered in white powder and unable to open their eyes. They told me that the shooting I saw from the roof was followed by agents coming from the gated lot and shooting at people exactly

as they had shot Ashley. Once they were cleaned up and able to open their eyes, they were released fairly quickly after a doctor looked them over. Ashley was kept for several hours because of the growing bulge on her forehead. She was released around midnight with a diagnosis of a concussion.

20. I am afraid to protest at Broadview or against ICE again. I have had the opportunity to go to more protests since this occurrence and I have chosen to stay home. As a single mom, I am hesitant to put myself at risk of ending up in the hospital myself.

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

Dated: 10-6-25

  
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Jaymi Raad