

DECLARATION OF ROBERT HELD

Robert Held declares as follows:

1. My name is Robert Held. I am an adult resident of Flossmoor Illinois. I have personal knowledge of the facts set forth herein and can competently testify thereto.
2. On Saturday, September 27, a little after noon, I went to a protest at the Immigration and Customs Enforcement (ICE) facility in Broadview, Illinois, to protest ICE's enforcement tactics in Illinois, to protest statements made by Trump administration leaders about immigration enforcement, and to observe ICE's treatment of protestors, which I have seen covered in news reports and online videos.
3. I stood near the fence on Beach Street that blocked access to the facility. A few times I saw Greg Bovino, the Commander at Large of the U.S. Border Patrol, whom I recognized from news reports, escorting detainees from a car into the ICE facility. People were shouting, and I shouted a number of insults at him. At one time, I pretended to "moon" him by turning my back to him, pulling my pants down about an inch, and bending over.
4. At one point, around 3:00 p.m., agents yelled at us to move away from a portion of the fence that extends into a parking lot. I moved to the left to see around a car parked in the facility. Although I was wearing a gas mask, I suddenly felt a spray hit my face and mask with such force that it either moved the mask or got under it.
5. I felt a sharp and painful burning sensation on my face. It was terrifying because I did not know what spray had hit me or how to treat the exposure.
6. I went to a white tent that had been set up by protesters and asked for help. By then, I shut my eyes which were burning and could not open them for more than 30 minutes. There were no medical personnel, and no one else knew how to how to help. I asked someone to

take my phone and call a friend who lives with a nurse; the nurse helped me by giving instructions to the person using my phone.

7. People poured water over my face; one person forced my left eye open and poured water on it. Eventually I could open my eyes, and after dousing water on my upper body, I rejoined the protest about an hour later.

8. I became even more animated at shouting loud insults at Mr. Bovino whenever I saw him behind the fence.

9. At one point I saw 40-50 agents (most in military style uniforms) lined up behind the gate with Mr. Bovino. The gate was opened and Mr. Bovino said, "All pedestrians will move outside the road now or you will be arrested for impeding. Let's move em out!" I tried to clarify but I was cut off and drowned out by shouting agents. The agents began walking down Beach Street and shouting to clear the street. I kept backing up on Beach Street toward Lexington Street, trying to comply. There was shouting by the personnel to "get off the roadway." Someone said, "Buddy, get off the road." Someone else said, "Sir, your last time I will tell you, get off the road." I tried to run away to get out of the street and away from them. I got across Lexington Street, but the agents ran after me.

10. When the agents caught up with me, I said, "Let me go; let me go, there's a fence; I'm 68." They told me that "they gave me an order," and "to get on the god-damn ground" and to "put my hands behind my back." They cuffed my wrists behind my back while I was face down. They told me to get up, but I could not. They helped me up, led me to a car, and put me in the back with a man who was groaning in pain. They drove us back down Beach Street toward the fence. I believe it was just after 5:30 p.m.

11. At one point, they stopped the car, someone opened the back door, and Greg Bovino was there with what appeared to be journalists behind him. He looked directly at me and loudly said, "Now what do you want to say to me?" I looked back at him without speaking. The car door was shut, and the car was driven into the ICE facility, where the other man and I were taken out of the car and directed to go inside the facility. Agents walked in front of and behind us.

12. I was kept in a holding room with other protesters who had been arrested. Although I was questioned, fingerprinted, and photographed, I was never charged with anything. I was released at around 1:30 a.m.

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

Dated: October 9, 2025



Robert Held

