

**DECLARATION OF JOANA KLONSKY**

Joanna Klonsky declares as follows:

1. My name is Joanna Klonsky. I am an adult resident of Chicago, Illinois. I have personal knowledge of the facts set forth herein and could competently testify thereto.
2. I am a communications consultant. I was acting in that capacity when I went to Immigration and Customs Enforcement's (ICE) Broadview facility at 1930 Beach Street, Broadview, Illinois, on the morning of September 26, 2025. I was there to facilitate access to the press for clients who were protesting there.
3. I arrived at Broadview around 7:00 a.m. There was a small group of less than 30 people near a steel fence that had been erected across Beach Street at the north edge of the driveway at the north end of the building. We were on the opposite side of the fence from the building. I stood around chatting with people.
4. All of a sudden, I saw a man in military fatigues and a mask over his face run across the roof to the edge closest to us. Without warning, the man began firing pepper balls into the crowd. I was not hit directly by any pepper bullets, but immediately my eyes were irritated, and my breathing was constricted. I put on an N-95 face mask and moved away as quickly as possible.
5. There was no indication of what provoked this attack. The protesters were simply standing around. I did not see any vehicles attempting to go in or out of the facility.
6. This happened again at least once while I was standing outside the fence on Beach Street—without warning or provocation, one or more officers on the roof fired pepper balls in into the crowd when there were no vehicles entering or exiting the Broadview facility.

7. At some point, I moved from Beach street to 25th Avenue and Harvard, where more protesters were gathered. Broadview police were directing traffic on I stood with other protesters in the Harvard Street alley. Things were quiet; we all were just standing around. Some people were singing.

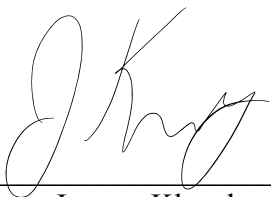
8. Suddenly and without warning, I heard the sound of the pepper rifle. Someone said “we’re being gassed.” One or more tear gas canisters were deployed. People all around and I myself were gasping for air and coughing. We were all running away, coughing strenuously. I do not believe any vehicles were trying to exit through Harvard street at that time, but since I was running away, I do not know for sure. When I got back to 25th Avenue, I could still feel the gas. The Broadview police officers also appeared affected by the tear gas.

9. More than 24 hours later, I was still feeling the effects of the tear gas. I had coughing, shortness of breath, and irritation in the sinuses and eyes.

10. Although the events of September 26, 2025, were extremely scary, I have been back to protest at Broadview since then and intend to do so again.

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

Dated: 10/07/2025

A handwritten signature in black ink, appearing to read 'J Klonsky', is written over a horizontal line.

Joanna Klonsky