

**DECLARATION OF ALEXANDRIA ONION**

Alexandria Onion declares as follows:

1. I have personal knowledge of the facts set forth herein and could competently testify thereto.
2. My name is Alexandria Onion. I am an adult resident of Chicago, Illinois.
3. On September 19, 2025, around 7 a.m., I arrived at a protest in front of the Broadview Immigration and Customs Enforcement (ICE) facility. When I arrived, there were around fifty people present.
4. I attended the protest with an elderly member of my community who is 78 years old.
5. The Broadview ICE facility 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.
6. I stood in the street, to the right of the gate. The gate was closed when I arrived.
7. When I first arrived, I did not see any federal agents in or around the Broadview ICE facility. Shortly after I arrived, I saw federal agents on the roof of the Broadview ICE facility. The agents were masked and were pointing their phones at the protesters, as if they were taking photos or videos of the crowd.
8. Additionally, shortly after I arrived, an automated message was playing on a loudspeaker. I am not sure the exact wording of the message, but the message stated that the protesters were obstructing justice and infringing on federal processes. The message also warned protesters that they could be arrested and that ICE could use chemical agents. The message

played so often it felt like it was on a loop. The message was also played so loudly through the loudspeakers that it interfered with protesters using bullhorns.

9. Around 8:30 a.m., federal agents lined up behind the Broadview ICE facility's gate and put on their gas masks. I saw around 10 federal agents. The agents were dressed in camouflage and military gear. They were wearing bullet-proof vests and helmets. I did not see "ICE" printed on any of the agents' uniforms, nor could I see any badges on the agents.

10. There were about five people lying in the driveway in front of the gate. Most people who were demonstrating were standing in the street. I continued to stand in the street to the right of the Broadview ICE facility's gate, not in the driveway.

11. The federal agents opened the gate of the Broadview ICE facility, and began to drive two cars out of the parking lot and towards the street. Instantly, there was a cloud of smoke coming from the parking lot where the federal agents stood, and agents on the roof shot what appeared to be pepper balls or rubber bullets towards protesters.

12. People started retreating away from the gates. I moved the elderly person I was with away from the smoke.

13. I helped two members of the press who had been affected by the chemical agents used. Their eyes were red. They were wheezing, coughing and crying.

14. At this point, I had also inhaled some of the smoke. I too was coughing and wheezing.

15. I then moved the elderly person I was with away from the Broadview ICE facility because we felt it was no longer safe for her to be there. We walked back to her car, and she left.

16. I went to a nearby gas station to buy more water for the people protesting.

17. I returned to the right side of the Broadview ICE facility, and stayed in the street for the remainder of the time I was there.

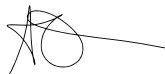
18. When I returned with the water, people were still recovering from the chemical agents used. I saw people with red eyes who were crying and struggling to breathe.

19. I left the protest shortly thereafter, around 10 A.M., because I felt unwell. I continued to cough and wheeze for about an hour after I left the protest. I had a headache and felt nauseated the entire day.

20. The elderly woman I was with wore an N-95 mask while we were at the protest. Still, she told me that she had a headache for the rest of the day.

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

Dated: 10/5/2025



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Alexandria Onion