

DECLARATION OF JULIE SAMPSON

Julie Sampson declares as follows:

1. I have personal knowledge of the facts set forth herein and could competently testify thereto.
2. My name is Julie Sampson. I am an adult resident of Chicago, Illinois.
3. On September 26, 2025, around 7:50 a.m., I arrived at a protest at the Broadview Immigration and Customs Enforcement (ICE) facility. I was initially standing near the intersection of 25th Avenue and Harvard Street. I could not see any federal officers from where I was standing.
4. Within ten to fifteen minutes of my arrival, I saw smoke in the air.
5. The smoke made me cough and cough. It felt hard to breathe at times because I was coughing so much. My eyelids itched and my head hurt. I also had a repugnant, chemical taste in my throat and mouth.
6. At first, I did not know why I was coughing so much. Someone told me that the smoke was chemical agents released by federal officers. Before September 26, I had never been subjected to chemical agents.
7. A friend of mine lent me an N-95 mask to wear. I did not bring a mask because I had no idea that I would need one. My friend told me that the mask would help with the effects of what was in the air.
8. Ten minutes later, federal agents released another wave of chemical agents on the crowd.
9. I walked down Harvard Street. As I walked down the street, I saw yellow casings on the ground. I also saw a volunteer clean a white powdery substance from the street with soapy water. All around me, people were coughing.

10. There are residential homes on 25th Avenue. At some of these homes, I could see kids getting ready to go to school, holding lunch boxes. I saw the kids cover their faces with their shirts because of what was in the air.

11. I waited with other protesters for the smoke to subside and the air to clear.

12. After a while, protest activity resumed on Harvard Street. There were people chanting; others were singing. Someone was playing an acoustic guitar.

13. I left a little after 9 a.m. I had been at the Broadview facility for just over an hour, but I had already experienced more than I had bargained for.

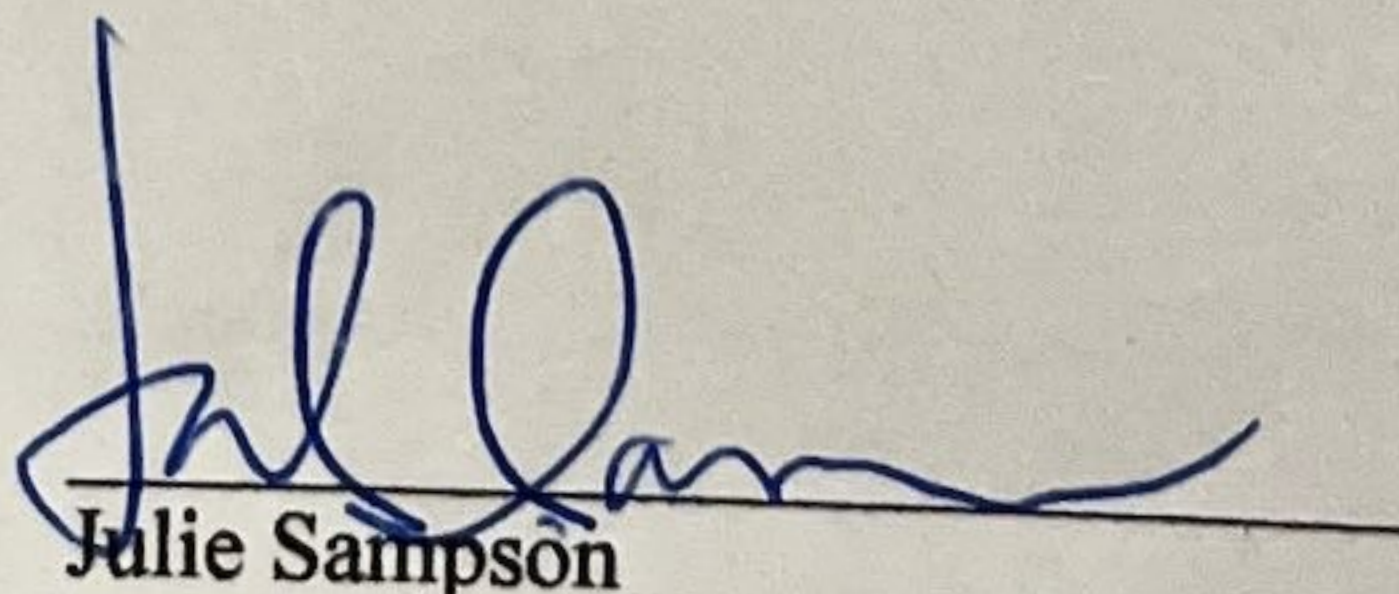
14. I kept coughing while I was in my car driving away from the protest. For several hours after I left, I was coughing, felt sick, had a headache, and could taste the lingering chemicals in my mouth and throat.

15. For as many protests as I have been to, I have never seen anything like what happened on September 26.

16. I am not certain if I will return to protest at the Broadview ICE facility. I still believe that it is important to speak up about how our federal government is treating people. But, given the way federal agents have treated activists protesting at the facility, I am scared about how I might be treated and what I would encounter if I were to demonstrate there again.

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

Dated: 10/7/25


Julie Sampson