

Declaration of Daniel Toerpe

I, Daniel Toerpe, declare as follows:

1. My name is Daniel Toerpe. I am above 18 years of age and am competent to make this declaration. I reside in the Chicagoland area.
2. On October 3, 2025, I went to the ICE facility in Broadview to protest against the ongoing federal immigration actions in the Chicago area. I came to protest because I grew up near Broadview and I was concerned for my Hispanic and immigrant neighbors being kidnapped by ICE.
3. I arrived early in the morning. There was a large group of protesters and journalists. I also observed a number of people engaged in Jewish religious practice who were singing and chanting. The group was located near the corner of 25th Street and Harvard Avenue.
4. There were many Illinois State Police officers in the area. I saw them arrest at least two individuals. The Illinois State Police officers were stopping the protesters and journalists from coming close to the Broadview facility. They also cleared a path for vehicles in the street. We were located hundreds of feet away from the gate at the end of Harvard Street that led to the facility.
5. At one point, a large group of agents dressed mainly in dark green uniforms, who appeared to me like Customs and Border Patrol agents, began to mass near the fence at the end of Harvard Street. I was among a group of protesters.
6. I watched as the group of agents approached us. They were led by a man I recognized as Gregory Bovino, who wore a helmet and, unlike most of the agents, did not wear a mask to hide his face.
7. There were Illinois State Police officers in the street who were keeping the protesters to the sides. There was no warning or instruction given before Bovino and dozens of agents started to march towards us.
8. I was near the front of the protesters, but I did not hear Bovino or anyone give any instructions, orders to disperse, or other notice to me or anyone else.
9. I did notice a number of Illinois State Police officers putting on gas masks as the agents approached, which was concerning to me and the other protesters.
10. Gregory Bovino walked directly up to me and told me, "you're under arrest." That was the first thing I heard him say. Then, he and other agents pulled me to the ground.
11. I was not resisting or doing anything to provoke an arrest. After the agents tackled me, I put my arms behind my back and was handcuffed. Agents stood me up and then walked me towards a guardrail on Harvard Street.

12. Agents with a tag reading “DHS PAO” took pictures of me and others who had been arrested. I asked an agent what my charges were, but he told me to “shut the fuck up.”
13. Agents with Homeland Security Investigations questioned me and other arrested protesters. Eventually, we were led into the Broadview facility.
14. The cells in the Broadview facility smelled terrible and looked like they hadn’t been cleaned in months.
15. I noticed a number of men who appeared to be detained for immigration arrests, one of whom was shirtless. They complained about the heat in the holding cell, but the federal officers scolded them to stop talking so much.
16. My holding cell was mostly filled with demonstrators who had been arrested. Later, agents brought in a young man with bruises and cuts on his face who was limping and who said he had suffered injuries from ICE agents.
17. I was questioned by FBI agents. I told them I would not answer their questions. They continued to ask me questions even after I told them I would not talk.
18. Eventually, I was taken to a van and released in a QuikTrip parking lot. I still do not know why I was tackled, arrested, and detained that day.

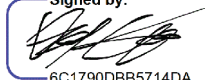
Pursuant to 28 U.S.C § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on:

10/20/2025

Date

Signed by:



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Daniel Iorpe