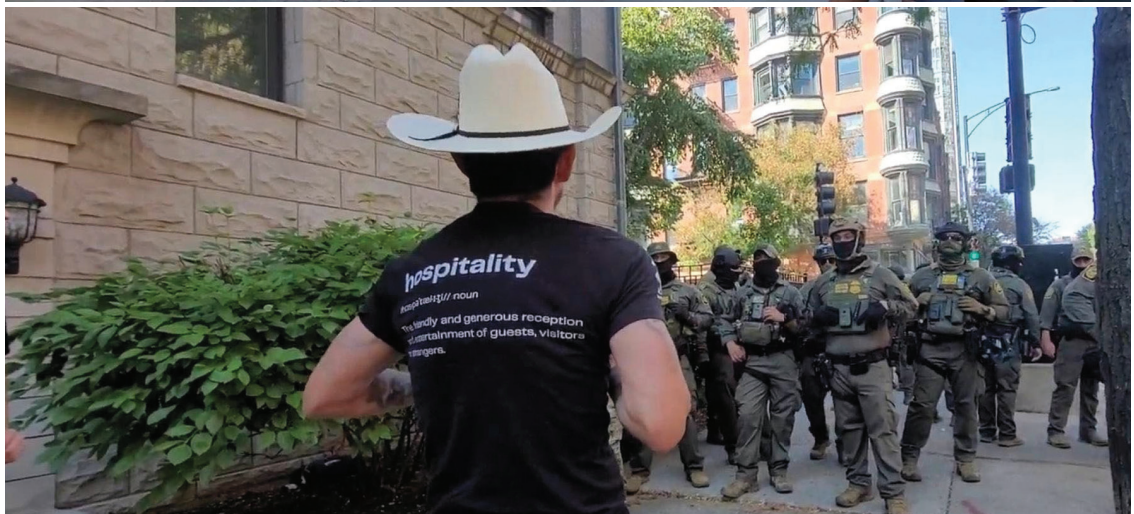
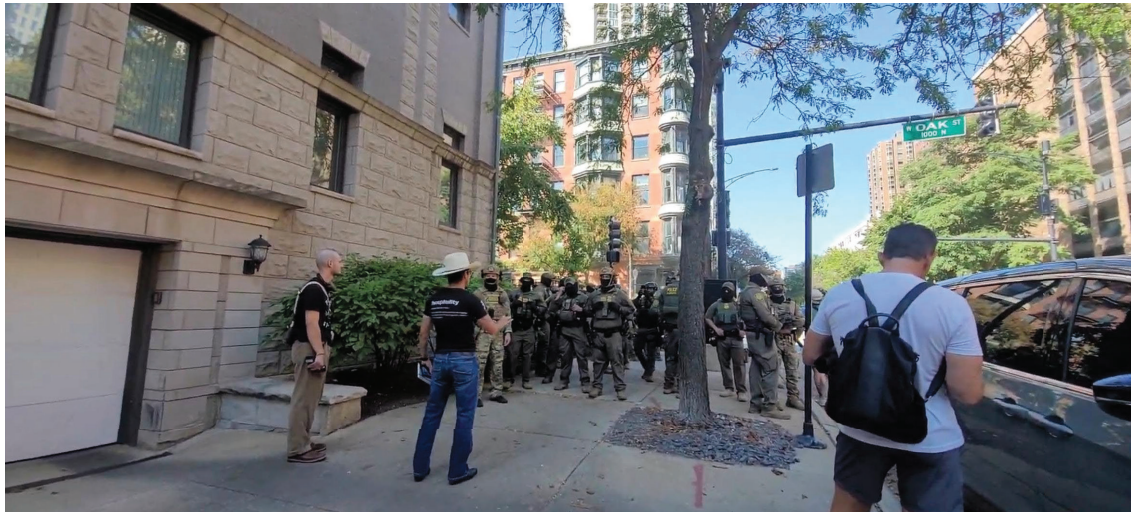


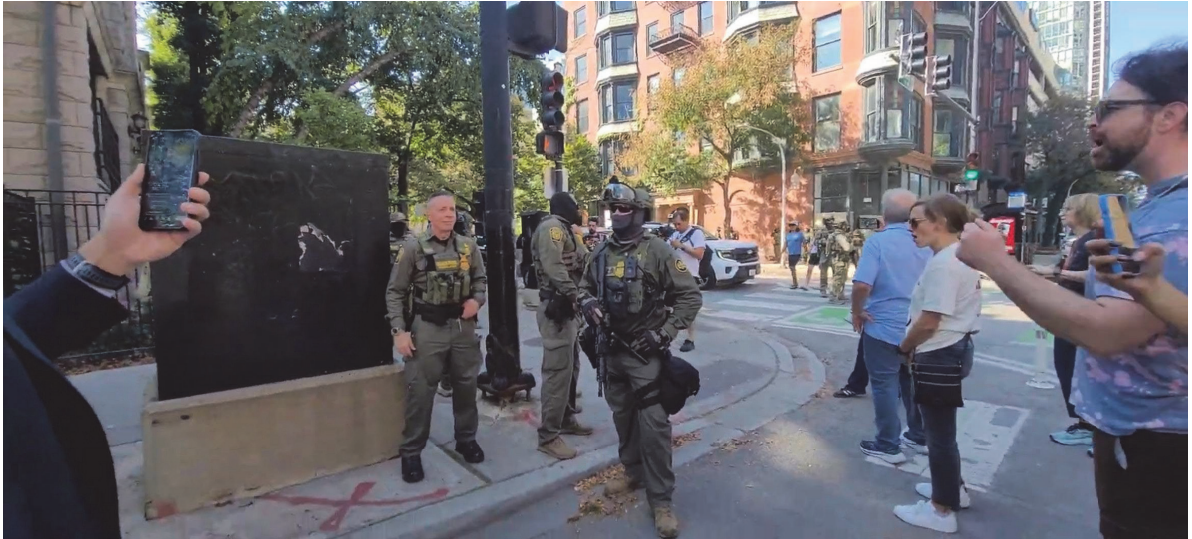
### DECLARATION OF JENNIFER LYDIA CRESPO

I, Jennifer Lydia Crespo, declare as follows:

1. I am a 38-year-old United States Citizen of Puerto Rican, Filipino, and Polish Jewish descent born in Chicago, Illinois.
2. I am a licensed attorney in Illinois.
3. I live in downtown Chicago and was in downtown Chicago on Sunday September 28, 2025 when Chief Agent Bovino was there with a large group of federal officers dressed in military-style uniforms and carrying weapons.
4. I saw from my apartment window a large group of federal officers dressed in military-style uniforms carrying what appeared to be guns near the Michigan Avenue bridge.
5. I walked to the location where I had seen the federal officers to observe what they were doing and soon observed the officers roaming the area on foot and occasionally speaking with civilians.



6. I witnessed Chief Bovino a few feet away from me at the intersection of Clark and Oak. I recognized Chief Bovino from media coverage I have seen on federal immigration enforcement.



7. Armed federal officers stood in place around Chief Bovino at this intersection located in the midst of multi-unit residences in mixed use buildings that also house small businesses. A crowd of civilians began to gather and ask questions about the reason for the show of force.
8. The following week on Saturday, October 4, 2025, I learned federal law enforcement was in Brighton Park, a neighborhood in Chicago, and that federal officers were using force against civilians protesting the shooting of a motorist there by a federal officer earlier that day. I went to Brighton Park to observe what was occurring and attempt to protect community members from being harmed.
9. When I arrived in Brighton Park I walked to the south corner of the intersection at 40th and Kedzie and observed a vehicle unlike anything I had ever seen before in Chicago. It resembled a tank and an officer stationed inside the top of the vehicle pointed a weapon resembling a rifle down at the crowds of civilians gathering in front of the tank, which was accompanied by several unmarked vehicles parked behind a line of federal officers who appeared heavily armed.



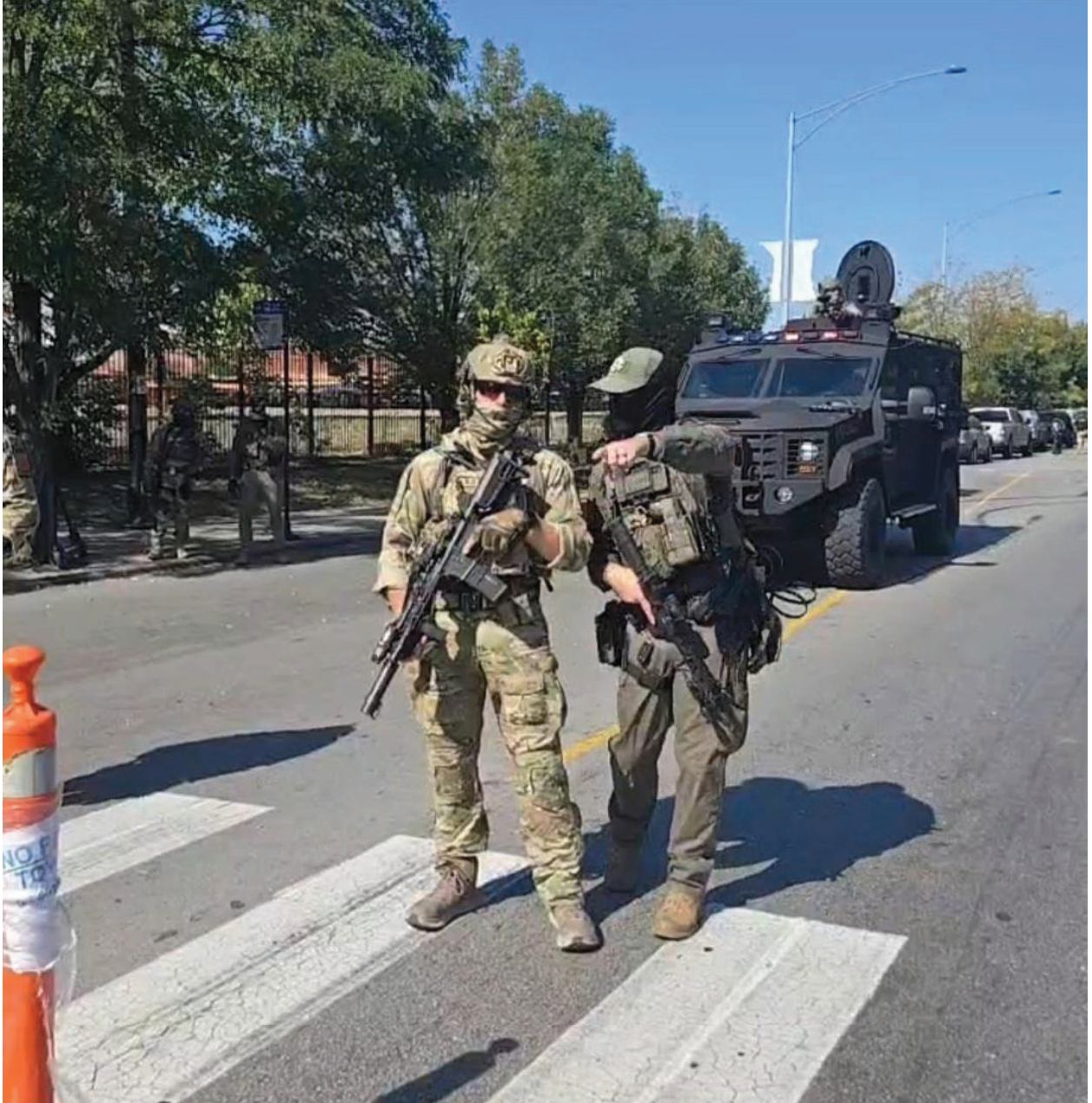












10. I observed what appeared to be press photographers moving around the crowd with cameras and taking pictures. I also observed what appeared to be news reporters near the edge of the crowd who were speaking into video cameras and microphones bearing network logos.
11. I occasionally heard a kind of popping sound and observed smoke billow and rise on the other side of the federal officers further behind the vehicle that resembled a tank.
12. I found other attorneys present, including one speaking with a megaphone encouraging everyone to be peaceful.
13. I began to comfort protesters, some of whom identified themselves to me as civilians living in the homes across the street. I helped clear protesters from the street.



14. I asked a federal officer there if he could please let me or another attorney know how we could help peacefully keep the crowd out of their way. I received no response.
15. At some point the Chicago Police began to arrive in groups at the south corner of the intersection at 40th and Kedzie and steadily began taking over and conducting crowd control. The other attorneys there and I spoke briefly with someone who appeared to be a higher ranking CPD officer. She stated CPD was there to make sure people could protest peacefully. The CPD officers I observed did not become confrontational and did not draw any weapons.



16. I continued to observe smoke rising from the other side of the federal presence at the intersection of 40th and Kedzie.
17. I walked around the intersection to the other side. At that time, I saw some smoke and several federal officers surrounding a man on the ground appearing to arrest him. I observed people coughing, yelling, and stumbling.
18. I observed photographers using cameras. I also identified other attorneys and observers and we began helping get protesters onto the sidewalk peacefully so that they would not be in the path of federal officers driving quickly through them in unmarked SUVs and vans.
19. At some point, CPD officers began to arrive in groups on that side of the intersection and steadily began taking over and conducting crowd control. The CPD officers did not become confrontational and did not draw any weapons.
20. CPD officers formed a line between the heavily armed federal officers and the protesters. I observed the federal officers move away from the crowd and further behind the line of CPD officers. I moved to the sidewalk and interfaced briefly with CPD officers. I helped encourage protesters to remain on the sidewalks away from any moving vehicles.
21. I was standing on the sidewalk near CPD officers when, without any warning, smoke began to quickly form in the area. A teargas canister landed a few feet away from where I stood and I was exposed to tear gas before I could even turn around.
22. Federal agents deployed tear gas and flashbang grenades to disperse not only protesters but also Chicago police. I overheard a protester ask a Chicago police officer if he needed help from the teargas.



23. I experienced difficulty seeing and breathing. I heard what sounded like tire screeching and speeding vehicles and could observe unmarked vehicles driving through the smoke



away from where the federal presence had gathered.





24. Before the tear gas was deployed, I did not observe any danger to the federal officers. Chicago police officers and attorneys had asked protesters to move off the street, and only a sparse crowd remained near the barrier Chicago police officers had formed with their bodies between the protesters and the federal officers.
25. I did not hear any audible warnings or dispersal orders before federal agents deployed tear gas and I observed absolutely no threat to federal law enforcement.

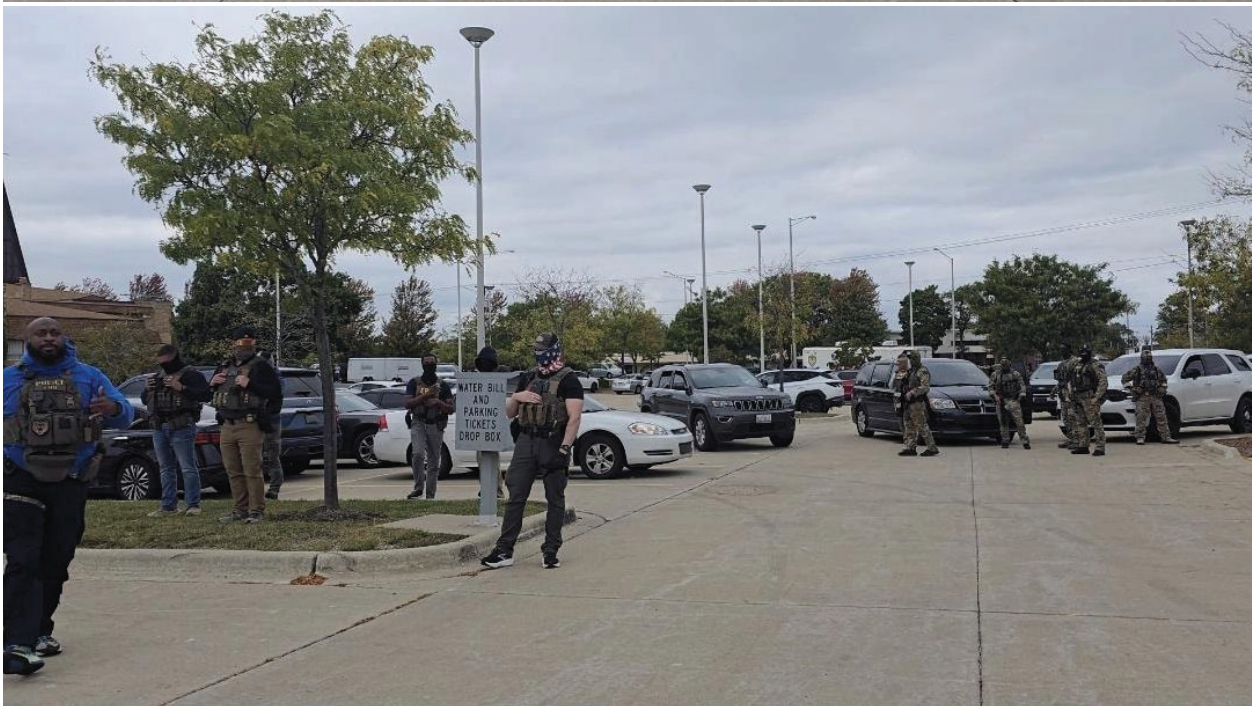


26. On Friday, October 10, 2025, I was taking the day off and visiting my parents in Hoffman Estates in Cook County near Schaumburg, Illinois.
27. My father is a state representative and that day received a call about a large federal presence at the Hoffman Estates Police Department building. We drove to the police station and confirmed the federal presence and drove back home.



28. I began to walk back to the police station to be a legal observer of what was happening there. My father and I walked together to the police station parking lot where I observed dozens of federal agents standing in front of many unmarked vehicles that were parked at the police station. Many of the federal officers wore face coverings. Several of the federal officers were carrying what appeared to be semi-automatic rifles. Some of the officers wore vests that had the letters "ERO" on them. Mostly I could not see any badge numbers or names displayed by the federal officers.





29. A small group of civilians was gathered outside the police station when I arrived. I briefly spoke with a woman who appeared visibly upset and she conveyed to me that her United States citizen daughter was being held by ICE in one of the vehicles parked at the police station. The woman directed me to a man she identified as the father of the girl being held.
30. I spoke with the man who identified himself as the father of a girl who had been taken by federal agents. I asked him what led to her arrest and he showed me a video on his phone



of a large male federal officer wearing a blue long sleeve shirt beneath a tactical vest pulling a young woman out of a car, throwing her to the ground, and violently arresting her. In the video the girl was screaming “I am not resisting” as she was being arrested. The video appeared to be taken from inside a house in front of which the arrest happened. The video immediately caused me to develop concern for the wellbeing of the young woman who was taken down by the federal officer.

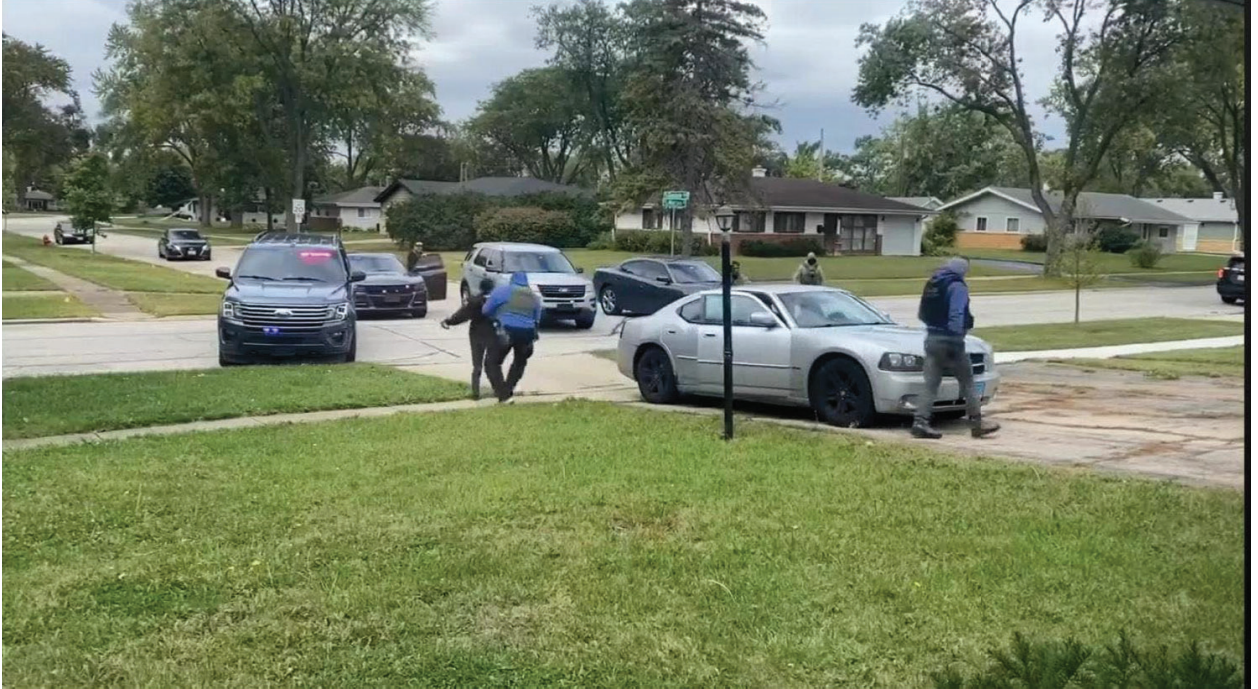
31. The man who identified himself as the father pointed to a vehicle behind the federal agents with one of its rear windows open a crack. Through the crack in the window, I saw the eyes and forehead of what appeared to be a young woman. The people who identified themselves as that young woman's parents were trying to shout to the young woman in the vehicle and I could hear sounds coming from the open window of the vehicle, which was in the midst of federal officers. The man who identified himself as the father told me federal officers were holding his daughter in that vehicle.
32. The below screenshot is from a video I saw that depicts the young woman that I later saw exiting the federal law enforcement officers’ vehicle and the federal agent in a blue sweatshirt that I spoke to inside the police station.















33. I later learned from the father of the young woman that she is named Evelyn, is 18 years old, is a United States citizen, and was arrested because she was “letting people know that federal law enforcement was in the area.”
34. I approached a federal agent and asked if the young woman had been given medical attention and was told to talk to the person in charge. I asked where I could find the person in charge and was told that he was inside the police station.



35. I walked into the police station where I found the police chief with two federal law enforcement agents. I immediately noticed that one of the federal officers was wearing a blue sweatshirt beneath a vest and appeared to be the officer who had conducted the violent arrest of the young woman in the video I had just watched.
36. I asked the two federal agents if they were in charge and they indicated they were. I introduced myself and my father before asking that the young woman be given medical attention. The federal agent who had arrested her stated that medical attention was not necessary.
37. My father, the state representative for the district that includes Hoffman Estates, asked the police chief whether she was cooperating with the federal agents and whether she would call a medic. The federal agents then indicated they would speak to the parents of the young woman. I led the federal officers outside the police station to the man who had introduced himself to me earlier as the father of the girl from the video who was being held by federal agents in the police station parking lot. He also requested medical attention for his daughter at that time.
38. Finally the police chief called the paramedics and informed my father and me that the paramedics were on the way. Soon thereafter, a Hoffman Estates Fire Department firetruck and ambulance arrived at the parking lot. I observed the federal agents open the door of the vehicle where the young woman was being held. I observed a girl emerge from the backseat of that vehicle who appeared to be the same woman violently arrested by a federal agent in the video I had just watched. The young woman was led to the paramedics and brought inside the ambulance without any federal officers following her inside.



39. The federal agents then left the scene when the young woman was in the ambulance with the paramedics.



40. I was shocked when I saw that DHS Assistant Secretary Tricia McLaughlin put out a statement falsely claiming that the video of Evelyn’s arrest was “not even ICE” and was “from a burglary arrest Chicago police made over a year ago.”
41. I want to continue to go to the locations where federal law enforcement officers are aggressively confronting the public to act as an observer, document my observations, and deescalate dangerous confrontations when observing the peaceful exercise of constitutional rights. I intend to continue if I can do so safely, but I am afraid that I will be targeted and fear I may be harmed when I am in these situations because of the way federal agents are using force against civilian bystanders, community observers, lawyers, reporters, and peaceful protesters.
42. I am able and willing to serve as a class representative in this lawsuit.



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:

10/20/25

Date

Signed by:

*Jennifer Crespo*

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Jennifer Lydia Crespo