

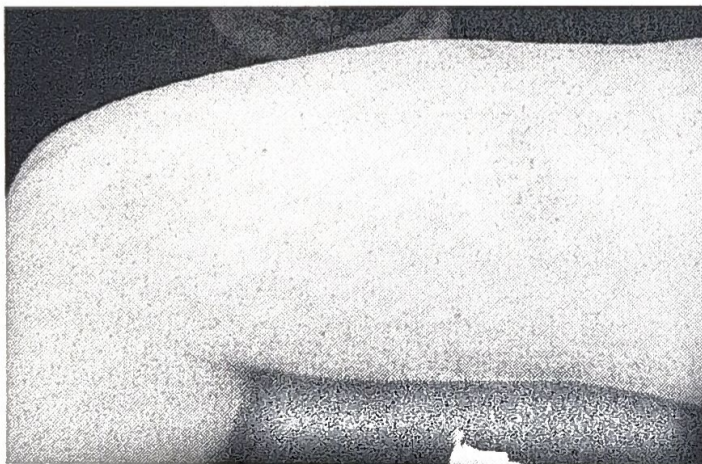
### Declaration of Manuel Garcia

I, Manuel Garcia, declare as follows:

1. My name is Manuel Garcia. I am above 18 years of age and am competent to make this declaration. I reside in the City of Chicago near the intersection of E. 105 St. and S. Ave. M.
2. On Tuesday, October 14, around 10:30 a.m., I was at my house when I heard the screeching of tires outside. I thought it sounded like a car chase, so I got up and looked out my window. I saw trucks driving very fast through my neighborhood. I was concerned that they would hit my car, someone else's car, or someone crossing the street. I went outside and saw that a car crash had happened at the intersection of E. 105 St. and Ave. N.
3. I was concerned about ICE activity in my neighborhood. I had seen videos of ICE cars driving recklessly and dangerously. I wanted to observe the ICE agents for myself.
4. Several vehicles pulled up at the site of the car crash. I saw individuals who looked like military officers. I believed they were ICE officers or other federal agents. They were carrying weapons that looked like guns and carried canisters.
5. I went back to my home but stayed on the porch, where I could hear and see protesters gathering near the intersection.
6. Protesters started to gather at the intersection. I heard them chanting things like "fuck ICE" and "go home" at agents. Some protesters held flags. I also saw journalists with large cameras, carts for carrying their camera equipment, and notepads. Some of them were interviewing people who had come to protest ICE. At some point, I noticed the agents putting on gas masks. At the time agents put on gas masks, I had not heard any warnings to leave.
7. I filmed the agents with my phone and took photos. Many people in the crowd, in addition to chanting, also took photos and videos.
8. Below is a photograph I took of the agents. I did not observe any badge numbers or other identifiers on their uniforms:



9. At one point, I saw agents arresting a girl on the street. I thought they were being too rough with the girl, and it looked to me like they were choking her. I hadn't seen the girl do anything violent against the agents. I told the agents to leave the girl alone because she hadn't done anything.
10. A crowd of people were upset about how the agents were treating the girl they had arrested. Suddenly, I noticed that there was tear gas near me. I didn't hear any warnings that the agents were planning to use tear gas or any instructions to leave. I started to look for my four-year-old daughter and girlfriend, who were near the intersection. I went to them because they needed my help to get home. Then more tear gas canisters went off and I was shot by what felt like rubber bullets coming from the direction of the agents. The photograph I took below shows the bruises from where I was shot:



11. I was not engaging with the agents when I was gassed and shot. I was just trying to make sure my daughter was safe. She was scared and crying. She has asthma, and I was trying to protect her. The gas burned my eyes and throat.
12. I did not hear the agents give any warning before they gassed the crowd and shot me.
13. I made sure my daughter was safely at home. Eventually, I moved back in the direction of the intersection. I noticed tear gas start to go off in the street. I didn't hear any warning before the tear gas was used. I saw and heard a woman calling for help with her baby. The agents continued to throw tear gas as I helped her bring her baby back to my porch.
14. The below video still shows me helping the mother and her baby escape from the tear gas:



15. I think it wasn't right for ICE to chase residents in unmarked vehicles. I want to continue to observe ICE if they are in my neighborhood. But I am worried I will be hurt or shot if I come close enough to observe them.

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:

10-16-2025

*Manuel Garcia*  
Manuel Garcia

**ATTACHMENT – COLOR VERSIONS OF PHOTOS IN MANUEL GARCIA’S  
DECLARATION**



