

DECLARATION OF DAVID BLACK

David Black, being under oath and on penalty of perjury, states:

1. I am an ordained minister in The Presbyterian Church (PCUSA). I graduated from Princeton Theological Seminary in 2018 with a Master of Divinity degree combined with a Master of Arts degree in Christian Education and Formation. For the past nine years, I have worked as a minister in various parish and chaplaincy settings. I am currently the Senior Pastor and Head of Staff at The First Presbyterian Church of Chicago, located in the Woodlawn neighborhood of South Side Chicago.

2. With the arrival in the Chicago area of many additional officers employed by Immigration and Customs Enforcement (“ICE”), I felt called and compelled by my Christian faith to come to the area around the Broadview ICE facility in Broadview, Illinois to minister to the ICE officers there and to urge them to repent and turn away from unnecessary and brutal enforcement of the immigration laws. In all, I have protested and ministered at the Broadview ICE facility on three days: August 29, 2025, September 5, and September 19. Each time at Broadview, I was visibly attired in clerical garb: a black shirt with a white clerical collar and black slacks. My consistent and explicit orientation has been as a Christian minister, offering prayers, blessings and imprecations from scripture, calling ICE officers to repent and believe the Good News, leading the gathering in singing traditional hymns and Christian spirituals, and offering spiritual support and consolation to those gathered in protest.

3. On September 5, I went to the Broadview facility in the company of a large group of clergy. We and others sang, marched, and prayed on the street in front of the facility. On that day, ICE officers remained behind the facility fence.

4. I returned to the Broadview ICE facility on September 19 at about 7 p.m. I was with a group of about 50 to 100 protesters, including other clergy, on the street in front of the ICE facility. I stood on the sidewalk in front of the facility fence. A group of ICE officers were stationed on the roof of the facility above me. Those officers were all masked and were dressed in military-style fatigues. They carried guns. I extended my arms, palms outstretched toward the ICE officers, in a traditional Christian posture of prayer and blessing. I do not remember the words that I used, but in substance I urged the ICE officers to repent and to believe the Good News that the Kingdom of God is near as I remained in a posture of prayer.

5. Without any warning, and without any order or request that I and others disperse, I was suddenly fired upon by ICE officers. In rapid fire, I was hit seven times on my arms, face and torso with exploding pellets that contained some kind of chemical agent. It was clear to me that the officers were aiming for my head, which they struck twice. One of the pellets that hit me on the head caused me to collapse to my knees. Others who were there gathered around me formed a human shield to protect me as the ICE officers continued to fire on our huddle. There is video of these events, which is available at this link (<https://spaces.hightail.com/space/6ZVrTLYnLr>).

6. After I was hit, a friend began to help me wash out my eyes. But almost immediately, a group of ICE agents stormed out of the ICE facility toward me and the other protesters. On the street in front of the facility, they targeted the people who were down, including me, pushing and shoving us toward a driveway across from the facility and trapping about a dozen of us in a kettling maneuver. They were armed and brandishing their weapons, and I feared for my life and the lives of other protesters in the kettle. The ICE officers deployed canisters of chemical weapons indiscriminately. One officer shoved me and sprayed chemicals

directly on me, aiming for my head and dousing my face. While I was attempting to escape the kettle, officers kept shoving me and spraying the back of my head. By the time I had gotten away, the agents had soaked me in liquid chemicals from my head to my toes. I was wearing a heavy denim jacket, shirt and undershirt, heavy denim jeans, and long underwear. The amount of chemical spray deployed was such that it penetrated through all these layers and covered every part of my body. The photographs below show this occurring:





7. I had trouble breathing and experienced a burning sensation on my entire body. A friend took my arm and led me away from the area, where in great agony I was offered eyewashes and contact lenses were removed from my eyes. At home, after showering and following decontamination protocols, I continued to experience the burning sensation throughout the night.

8. I fear that, should I protest, pray, and minister at Broadview, I will be met with violent retaliation. Given the unprovoked escalations of ICE agents against me and other

peaceful protesters, I also fear that their supervising officers will not deter them from using deadly force against protesters. The memory of what happened to me sometimes provokes a physical reaction. Nonetheless, my faith strongly calls me to return, even in the face of my fear. 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:

03/10/2025

Date


Rev. Black (Oct 3, 2025 19:04:45 CDT)

The Rev. David Black