

Declaration of Father Brendan Curran, OP

I, Brendan Curran, declare and state as follows:

1. I am a Catholic priest with the with Dominican Friars with the Province of St. Albert the Great, USA. I am the North American Dominican promoter for justice and peace. I am also a member of the Dominican International Commission for Justice and Peace.
2. I was one of the original Catholic priests that started the Friday prayer vigils at Broadview Detention Center almost 19 years ago. I have been regularly attending the Friday prayer vigil since it began.
3. At the vigils, I, along with other Catholic priests, sisters and brothers, other religious clergy and lay people, gather to pray the rosary and pray for the people who are detained in that facility, their families and the people that work there, including agents employed by the Immigration Customs Enforcement Agency, known as ICE.
4. I have attended the Friday prayer vigils at Broadview Detention Center as an expression of my Christian faith and its tenet that I am called to welcome my brother and sisters who are immigrants.
5. That tenet of my faith is rooted in the teachings of Jesus, who was also a refugee when he fled to Egypt. For example, the Book of Matthew, Chapter 25, which states, in part: “For I was hungry and you gave me something to eat; I was thirsty and you gave me something to drink; I was a stranger and you welcomed me.”
6. In the past, after the vigil, two of the vigil participants, were permitted to board the bus and pray with immigrants who were being transported to O’Hare Airport and/or across the boarder to offer prayer, support and communicate resources they could use once they were deported.

7. For the past 19 years until September of this year, our prayer vigil was located in front of the main entrance of Broadview Detention Center on Beach Street. We were located often near the access ramp to the facility or on the grass in front of the sidewalk in front of the front entrance of the facility.

8. Prior to September of this year, a group has gathered to meet and pray at the Broadview Detention Center every Friday for 19 years without any threat of violence from ICE agents or other federal agents. We have peacefully gathered to pray and bear witness without experiencing violence or the threat of violence.

September 12, 2025

9. On September 12, 2025, I attended the Friday prayer vigil.

10. On that day, I observed camouflage fatigues and masked agents on the roof of the Broadview Detention Center. The agents were armed with guns and the agents pointed the guns in our direction as we met to pray.

11. On this day, we were still able to hold our prayer vigil in the same location we usually did, however, I felt intimidated by the agents who were dressed in military fatigues, masked and pointing guns from the roof down towards us.

12. I took the photograph attached as Exhibit A to my declaration and it is a true and accurate depiction of where we held our prayer vigil on September 12th, in front of the facility on the sidewalk on Beach Street in front of the accessibility ramp.

13. I also observed protesters at Broadview Detention Center on September 12 when I was there for the vigil.

14. I took the six pictures attached to my declaration as Exhibit B photographing some of the peaceful protestors at the facility on September 12.

15. While on Beach Street for the vigil, I also observed protesters peacefully and verbally protest ICE agents and other agents that were dressed in military camouflaged fatigues, masked and armed with guns as they exited the facility and walked towards where the agents' vehicles were parked.

16. I observed some of the camouflaged and armed agents physically push some of the protesters. Before observing the ICE agents push protesters, I did not observe the protesters taking any actions to physically threaten the agents to provoke being physically pushed by them.

September 26, 2025

17. On Friday, September 26, 2025, I again attended the prayer vigil at the Broadview Detention Center.

18. I arrived at approximately 7:15a.m. just before the vigil began.

19. At this time, a fence had been erected around the facility and I observed barricades on Beach Street and on the sidewalks along Beach Street, as well.

20. When I arrived, there were a handful of protesters at the facility peacefully protesting on Beach Street in front of the gate that was erected around the facility.

21. A few protesters were chanting or yelling, expressing their views that they opposed ICE verbally.

22. The prayer vigil started shortly after 7:15 a.m.

23. On this day, we were not able to pray in the location where we have been praying for the past 19 years, which is standing on Beach Street in front of the front entrance.

24. Instead, we had to move, and gather our vigil was held away from the facility further down Beach Street near the intersection of Beach and Lexington Streets.

25. We decided that we had to move the location of our prayer vigil because of the ICE agents, positioned on the roof of the Broadview Detention Center, who were masked and

armed with guns, and our fear that the ICE agents may use tear gas, gas or smoke bombs or shoot rubber bullets at the protesters as they had done in the days prior to September 26, 2025.

26. The pictures attached as Exhibit C truthfully and accurately depict where we held our vigil on September 26th down the street from the Broadview Detention Center in front of a Reynolds Advanced Materials, located at 2600 Lexington Street.

27. I knew about the potential use of chemical agents hearing from other religious leaders and due to reading the local newspaper and through other news sources about the events that had occurred in the days prior to September 26th.

28. Our prayer vigil lasted for approximately 30 minutes from 7:15 a.m. to 7:45 a.m., which is the typical duration.

29. After our vigil concluded, I walked towards Harvard Street. I saw protesters walking and other religious leaders walking towards our prayer group. They were coming down Lexington Street.

30. As they approached, I observed that the protesters were coughing and appeared to have been sprayed with something. I observed them being treated with water.

31. Then, I followed the path that the protesters had come from towards Harvard Street. I observed a large crowd of protesters and religious leaders along the street.

32. As I was walking on Harvard Street, I began to cough and my eyes began to tear from exposure to the tear gas that the ICE agents had used on the protesters that was permeating the air on Harvard Street.

Impact of the Violence and Threat of Violence

33. I plan to return to Broadview Detention Center for the Friday prayer vigil on October 10th and beyond because of my religious beliefs and practices described above that have called me to this vigil for the past 19 years, and continue to call me now despite the ways in

which our prayer vigil has been impacted and forced to move locations, limited who can safely participate, and the fear of violence I know face in attending.

34. As a result of the violence I personally witnessed ICE agents inflict on protesters on September 26th, I am fearful that practicing my faith by attending the Broadview prayer vigil, now exposes me to the significant risk of violence and harm. Specifically, I fear ICE agents will deploy some form of tear gas, chemical spray, flash bang grenade, and/or rubber bullets on me while attending the vigil.

35. I also fear that by attending the vigil I might be subject to arrest and detention.

36. I am now faced with a difficult choice of faithfully expressing my religious beliefs in the manner I have done so for nearly two decades and expose myself to violence and possible arrest, or stay away, which would stop me from participating in a regular prayer vigil that is an expression of my faith and beliefs and that I have participated in regularly for nearly two decades.

37. The recent events also have caused me deep sadness as an American to witness the government turn against its people in this manner.

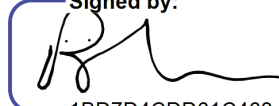
38. In addition, for years, I have invited and lead Catholic students from local Catholic High Schools and Colleges to participate in the prayer vigil as an opportunity to engage in service learning and religious education.

39. Since the recent events, I am only inviting priests and other religious clergy or leaders to attend the vigil. I no longer feel it is safe for students to be at the facility to pray due to the threat that they will be subjected to tear gas, rubber bullets or other forms of violence directed at them from ICE agents.

40. This has already chilled our ability to provide religious education to Catholic students. On September 26th, students from St. Martin's Catholic High School were scheduled to attend the vigil for a service learning experience at Broadview Detention Center to attend the prayer vigil, learn and guide them in a reflection. The school's administration cancelled the students' participation in light of the risk of violence they would likely encounter.

41. For decades in my role as a Catholic priest, I have participated in peaceful protests for a number of social justice issues, including Black Lives Matter protests, and international protests such as in Chiapas during the civil war between Zapatistas and the Mexican government. In all those experiences, I have never felt under such direct threat of violence, arrest and surveillance to silence my voice or vigil as I did on September 26th.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of October, 2025.

Signed by:


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Father Brendan Curran, OP

EXHIBIT A

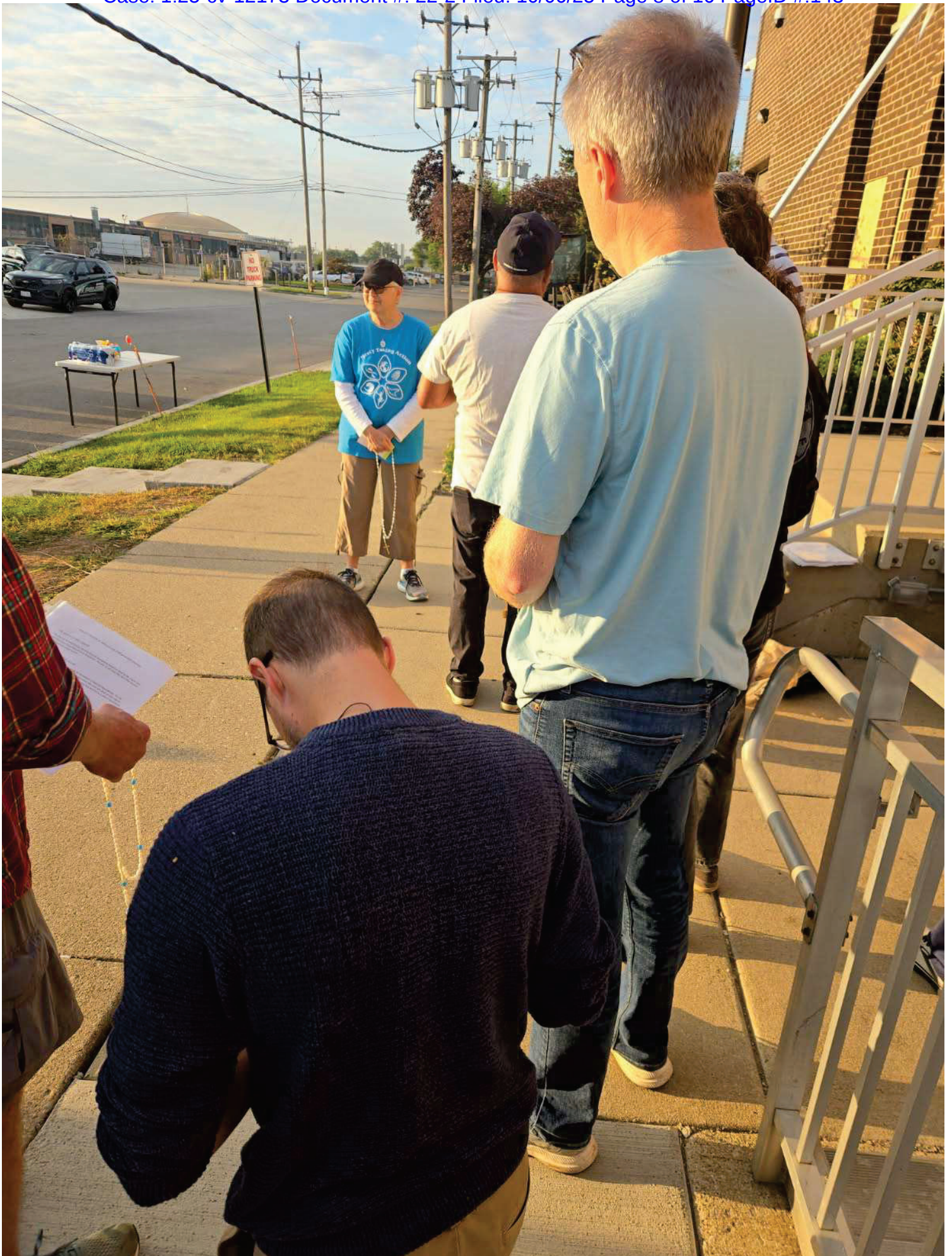
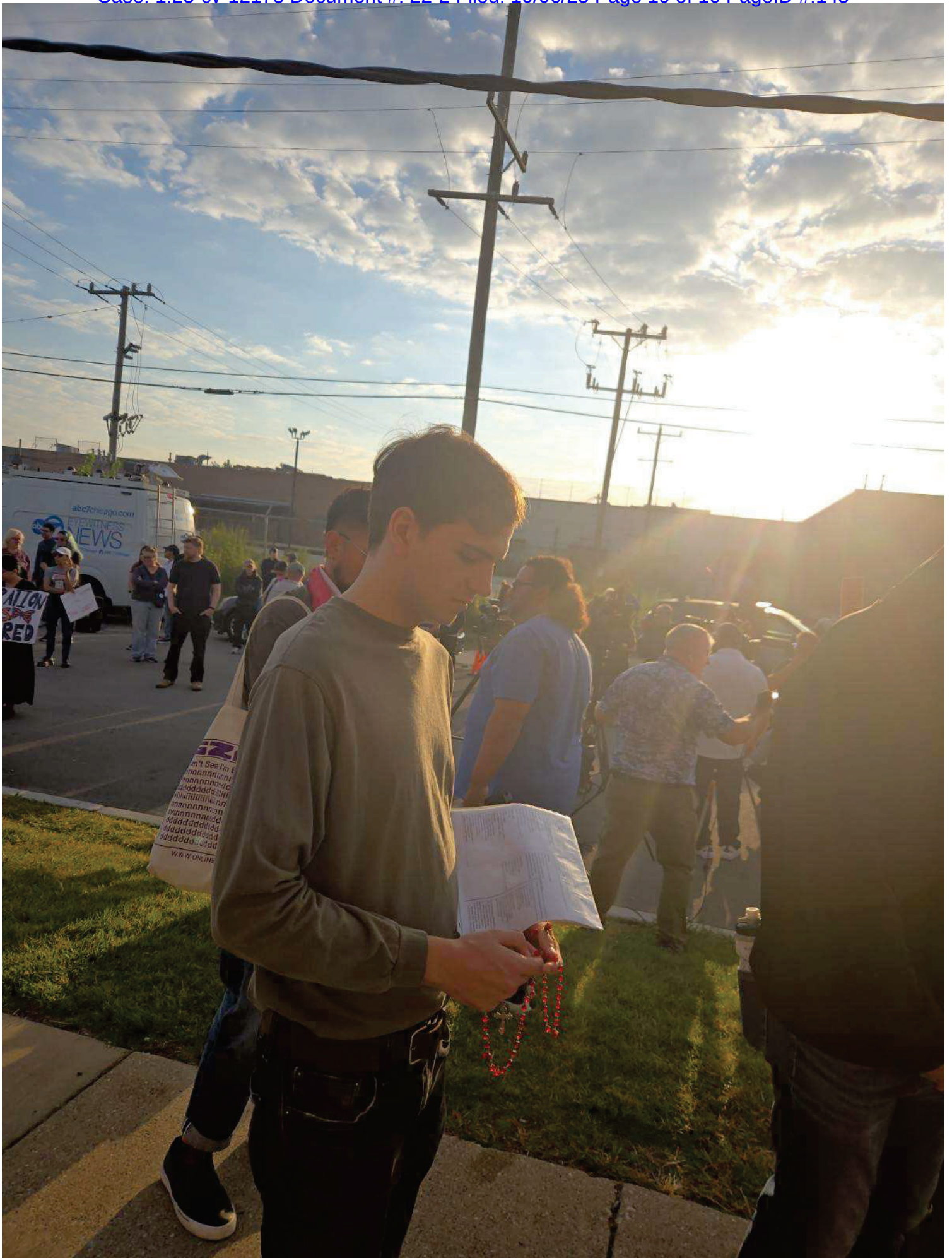
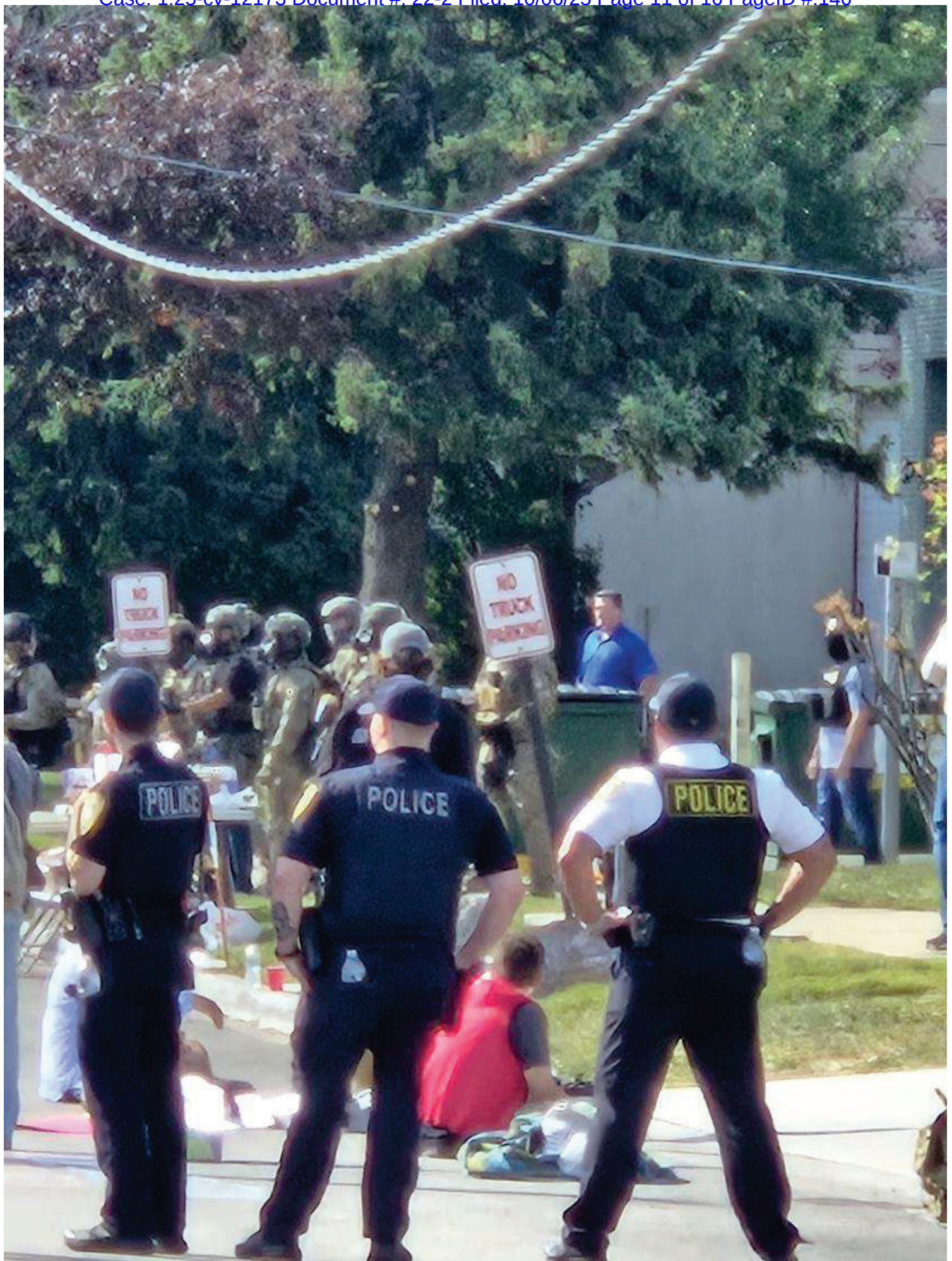


EXHIBIT B





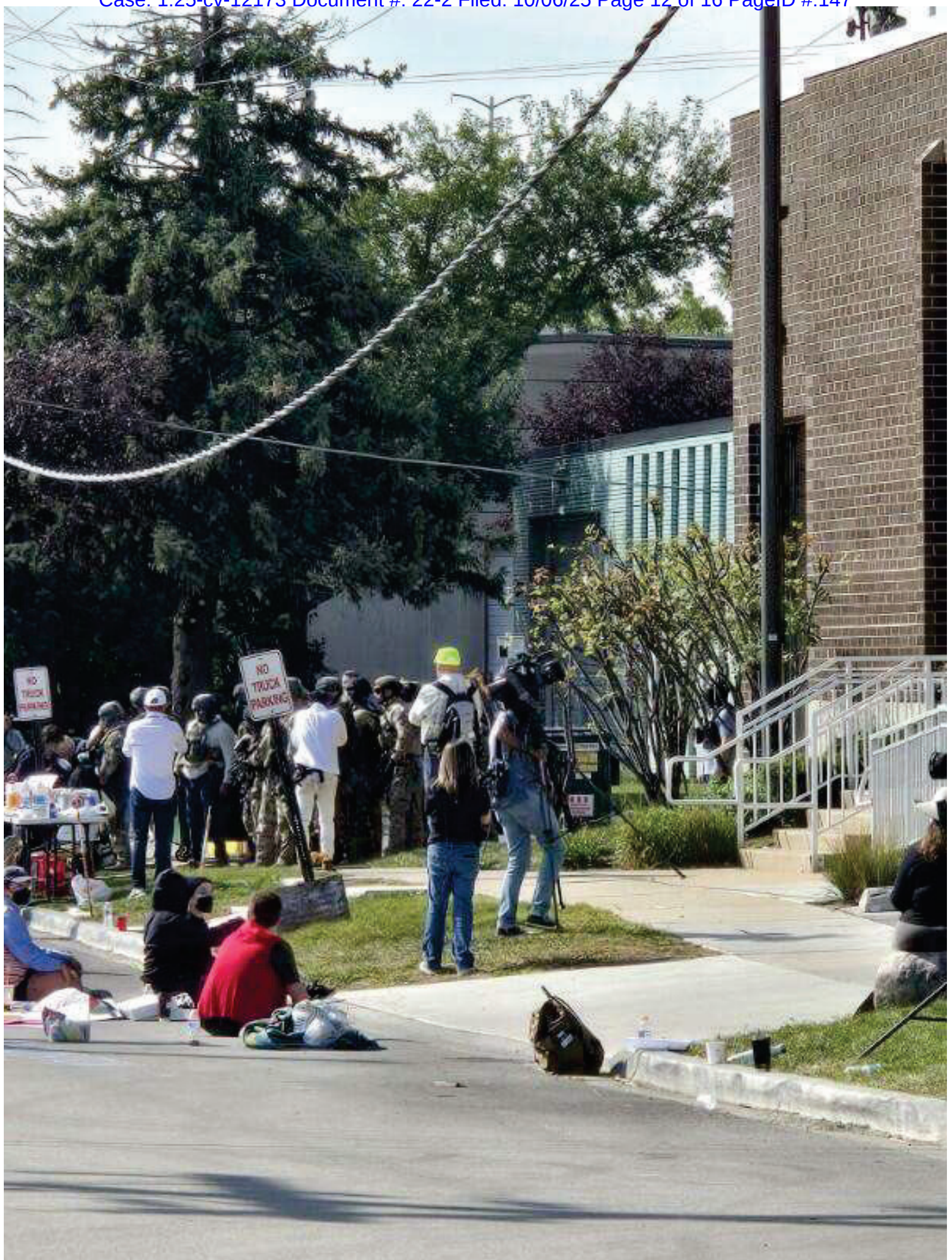






EXHIBIT C

