

EXHIBIT 20

DECLARATION OF CHAO ZHOU

I, CHAO ZHOU, make the following declaration based on my personal knowledge and declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a resident of Chicago, Illinois, where I have lived since January 2022. I have lived in the United States since December 2020. I have filed a petition for asylum based on my fear of persecution by the Chinese government due to my participation in the Hong Kong democracy protests. The petition is currently pending.
2. On June 12, 2025, at 10:30 a.m., I went to my scheduled asylum interview at the United States Citizenship and Immigration Services (“USCIS”) office at 181 W. Madison St. I felt optimistic about the interview because I knew I had a well-founded claim.
3. A USCIS officer checked me in and asked me to sit in the waiting room. Around 11:30 a.m., I was informed that the interview was being canceled due to unspecified “security concerns” and that it would be rescheduled. After thanking the officer, I left the building.
4. As I stepped outside, I was immediately pinned against a wall by ICE officers and handcuffed. I was then transported to ICE’s facility at 1930 Beach St., Broadview, Illinois, where I was processed. I stayed at Broadview until nearly midnight on June 13, 2025, when I was transferred to Bourbon County Jail in Kentucky. I was later transferred to Kenton County Jail in Kentucky. An immigration judge in Chicago approved my bond on July 2, 2025, and I was released on July 4, 2025.
5. At Broadview, I was first held in a small room with about ten people. The temperature was very cold, although the temperature was normal in the ICE offices. There was one stainless steel toilet, visible to everyone in the room, and a window through which we could see the ICE offices and a women’s holding room. There were two phones on the wall that no one could figure out how to use. Requests for phone cards were denied. I was able to reach my attorney only by placing a collect call.
6. At night, we were moved to a larger room with around 50 seats and 15 people. There were two toilets available that were exposed to the room and afforded no privacy. There was no opportunity to bathe or shower. There was a shower fixture in the room, but a sign on it read “out of order.” The room stank of body odor.
7. At night, it was impossible to sleep. The room was freezing cold. There were no beds or mats to sleep on. Instead, we each lay across three seats. We had no bedding, but two metallic foil blankets. The blankets made a loud rustling noise that continued all night. The bright lights in the room were kept on all night.
8. The following day, we remained in the larger room, but many more men were added. Some had to sit on the floor.

Executed on the 12th of October, 2025 in Chicago, Illinois.


Chao Zhou

10/17/2025

Date