

**Attachment to the Standard Form 95 detailing the basis of Mr. ██████'s claim**

Claimant: ██████ (“Mr. ██████”)

We present the information required in Standard Form 95 below, organized by the categories listed on the form, unless otherwise completed in form submitted with these materials as Exhibit B.

We are submitting these claims without the benefit of formal discovery. Mr. ██████ reserves the right to amend or supplement his claim.

**1. Submitted to (“Submit to Appropriate Federal Agency”):**

We submit this claim to the U.S. Department of Homeland Security, U.S. Customs and Border Protection, U.S. Border Patrol, U.S. Immigration and Customs Enforcement, the Bureau of Alcohol, Tobacco, and Firearms, and the Federal Bureau of Investigation (collectively the “Government Agencies”) involved in the arrest, detention, and other tortious conduct that agents or officers of the Government Agencies committed against Mr. ██████. To the extent other federal employees or agents were involved in the arrest and detention of Mr. ██████, we submit this claim to those employees’ agencies.

**6. Date and Day of Accident**

On or about September 30, 2025, the days that followed, and throughout Mr. ██████’s detention, which originated from the agents’ conduct on or about September 30, 2025. Agents of the Government Agencies arrested and detained Mr. ██████ on or around September 30, 2025, and continued to detain Mr. ██████ until in or around March of 2026.

**7. Time (A.M. or P.M.)**

Agents of the Government Agencies arrested and detained Mr. ██████ in the A.M. on or about September 30, 2025, and continued to detain Mr. ██████ until in or around March of 2026.

**8. Basis of Claim**

Mr. ██████ was a victim of an unprecedented, militarized raid on an apartment building on a quiet residential block in the South Shore neighborhood of Chicago. In the dead of night, hundreds of heavily armed federal agents descended on the building with military equipment including Blackhawk helicopters, military assault rifles, battering rams and canines—as well as government camera crews who filmed the operation to produce video reels quickly posted to the internet. The raid resulted in emotional trauma, physical injuries, and brutal detention, as well as property damage and loss. It impacted scores of people, U.S. citizen and non-citizen like, for no lawful purpose.

**A. September 30, 2025: The Raid**

Shortly after midnight on or about September 30, 2025, approximately 300 federal law enforcement officers from DHS, ATF, and the FBI (collectively “agents”), executed a military-style raid on a 130-unit, five-story apartment complex (“the complex”) located at 7500 S. South

Shore Drive, Chicago, IL, 60649.<sup>1</sup> The DHS agents included members of two tactical units: the Border Patrol Tactical Unit—the agency’s elite SWAT division—and a special response team of Customs and Border Protection officers who usually work at ports of entry.<sup>2</sup> The agents were masked and wearing tactical gear.<sup>3</sup> Equipped with guns and flashbang grenades, agents surrounded the building in armored trucks and unmarked vans and rappelled onto the roof from an airborne Black Hawk military helicopter.<sup>4</sup> Agents were followed by a government camera crew and drones as they carried out the operation.<sup>5</sup> DHS posted video footage of the raid on social media, showing agents breaching doors and angling weapons into apartments in the complex.<sup>6</sup>

Agents went door to door, forcing their way into apartments, battering down doors and cutting out deadbolts.<sup>7</sup> Panicked residents hid under beds, climbed into elevator shafts, and jumped out of

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<sup>1</sup> Melissa Sanchez, Jodi S. Cohen, T. Christian Miller, Sebastian Rotella, and Mariam Elba, “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>; Tim Sullivan, *In Chicago, An Immense Show of Force Signals a Sharp Escalation in White House Immigration Crackdown*, Associated Press (Oct. 21, 2025), <https://www.ap.org/news-highlights/spotlights/2025/in-chicago-an-immense-show-of-force-signals-a-sharp-escalation-in-white-house-immigration-crackdown/>.

<sup>2</sup> Melissa Sanchez, Jodi S. Cohen, T. Christian Miller, Sebastian Rotella, and Mariam Elba, “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>

<sup>3</sup> Chicago Tribune, *They were already living in one of Chicago’s worst apartment buildings. Then came the ICE raid* (Oct. 19, 2025) <https://www.chicagotribune.com/2025/10/19/ice-chicago-apartment-raid/>; Maira Khwaja, et al., *Federal Agents Storm South Shore Building, Detaining Families and Children*, South Side Weekly (Oct. 6, 2025), <https://southsideweekly.com/federal-agents-storm-south-shore-building-detaining-families-and-children/>.

<sup>4</sup> Tim Sullivan, *In Chicago, An Immense Show of Force Signals a Sharp Escalation in White House Immigration Crackdown*, Associated Press (Oct. 21, 2025), <https://www.ap.org/news-highlights/spotlights/2025/in-chicago-an-immense-show-of-force-signals-a-sharp-escalation-in-white-house-immigration-crackdown/>; Sophia Tareen, *Using helicopters and chemical agents, immigration agents become increasingly aggressive in Chicago*, Associated Press (Oct. 6, 2025) <https://apnews.com/article/chicago-immigration-federal-arrests-helicopter-trump-ice-8dbf688f78f3b6d1b8fdb989557b28c4>; Maira Khwaja, et al., *Federal Agents Storm South Shore Building, Detaining Families and Children*, South Side Weekly (Oct. 6, 2025), <https://southsideweekly.com/federal-agents-storm-south-shore-building-detaining-families-and-children/>; Mack Liederman, *Armed Agents Raid South Shore Apartment Building Overnight Tuesday*, Block Club Chicago (Sep. 30, 2025), <https://blockclubchicago.org/2025/09/30/armed-agents-in-unmarked-vans-target-south-shore-apartment-building/>; Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

<sup>5</sup> Nicholas Bogel-Burroughs et al., *A Squalid Building, A Tip to the Feds, and Then ‘Straight-Up Chaos,’* New York Times (Oct. 19, 2025), <https://www.nytimes.com/2025/10/19/us/chicago-south-shores-border-patrol-raid.html>.

<sup>6</sup> Department of Homeland Security (@DHSgov), X (Oct. 02, 2025, 12:06PM), <https://x.com/DHSgov/status/1973796727615598738> ; Department of Homeland Security (@DHSgov), X (Oct. 10, 2025, 01:14PM), <https://x.com/DHSgov/status/1976713056202772899>

<sup>7</sup> Andrew Carter, *They Were Already Living in One of Chicago’s Worst Apartment Buildings. Then Came the ICE Raid*, Chicago Tribune (Oct. 22, 2025), republished in Arizona Daily Sun (Oct. 27, 2025), [https://azdailysun.com/they-were-already-living-in-one-of-chicago-s-worst-apartment-buildings-then-came-the/article\\_e1ecf736-6947-474a-a0e9-fd6fda0f355e.html](https://azdailysun.com/they-were-already-living-in-one-of-chicago-s-worst-apartment-buildings-then-came-the/article_e1ecf736-6947-474a-a0e9-fd6fda0f355e.html); Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>; Tim Sullivan, *In Chicago, An Immense Show of Force Signals a Sharp Escalation in White House Immigration Crackdown*, Associated Press (Oct. 21, 2025), <https://www.ap.org/news-highlights/spotlights/2025/in-chicago-an-immense-show-of-force-signals-a-sharp-escalation-in-white-house-immigration-crackdown/>.

windows.<sup>8</sup> Agents reportedly pointed their guns at residents, pulled them from their beds, restrained them with zip ties, and marched them out of the building.<sup>9</sup> At least six residents reported that agents physically struck or kicked them.<sup>10</sup> A law enforcement dog bit a resident, leaving blood on the floor of an apartment.<sup>11</sup> In at least one apartment, agents forced a resident to his knees while his 6-year-old nephew clung to him, sobbing.<sup>12</sup>

Residents reported not having enough time to clothe themselves or their children before being dragged from their apartments.<sup>13</sup> Agents scrawled apartment numbers in black marker on the arms, bare chests, and foreheads of complex residents, all while a NewsNation camera invited by the government filmed the scene.<sup>14</sup> Masked agents required residents to line up, asked residents for their name and country of origin, and lifted their shirts to inspect them for tattoos, asking whether they were members of Tren de Aragua.<sup>15</sup> Residents appeared to be separated by race and ethnicity.<sup>16</sup> Children were zip-tied to one another and separated from their parents, who were loaded into separate trucks and vans.<sup>17</sup> Detainees were not told why they were being held and were

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<sup>8</sup> Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

<sup>9</sup> Sergio Martínez-Beltrán, *Chicago South Shore Building Residents Recount Humiliating Ice Raid*, NPR (Oct. 24, 2025), <https://www.npr.org/2025/10/24/nx-s1-5570113/chicago-south-shore-building-residents-recount-humiliating-ice-raid>; Nicholas Bogel-Burroughs, et al., *A Squalid Building, A Tip to the Feds, and Then ‘Straight-Up Chaos,’* New York Times (Oct. 19, 2025) <https://www.nytimes.com/2025/10/19/us/chicago-south-shores-border-patrol-raid.html>; Rebecca Schneid, *‘Military-Style’ ICE Raid on Chicago Apartment Building Shows Escalation in Trump’s Crackdown*, Time (Oct. 4, 2025), <https://time.com/7323334/ice-raid-chicago-pritzker-trump/>; Cindy Hernandez, *Massive immigration raid on Chicago apartment building leaves residents reeling: ‘I feel defeated.’* Chicago Sun-Times (Oct. 1 2025), <https://chicago.suntimes.com/immigration/2025/10/01/massive-immigration-raid-on-chicago-apartment-building-leaves-residents-reeling-i-feel-defeated>.

<sup>10</sup> Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*; Nicholas Bogel-Burroughs, et al., *A Squalid Building, A Tip to the Feds, and Then ‘Straight-Up Chaos,’* New York Times (Oct. 19, 2025) <https://www.nytimes.com/2025/10/19/us/chicago-south-shores-border-patrol-raid.html>; Cindy Hernandez, *Massive immigration raid on Chicago apartment building leaves residents reeling: ‘I feel defeated.’* Chicago Sun-Times (Oct. 1 2025), <https://chicago.suntimes.com/immigration/2025/10/01/massive-immigration-raid-on-chicago-apartment-building-leaves-residents-reeling-i-feel-defeated>; Cate Cauguiran, et al., *ICE agents raid South Shore Apartments; Trump says Chicago could become military training ground* ABC7, (Oct. 1, 2025), <https://abc7chicago.com/post/ice-chicago-federal-agents-surround-south-shore-apartment-building-dhs-requests-military-deployment-illinois/17908911/>.

<sup>14</sup> Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

<sup>15</sup> *Id.*; Maira Khwaja, et al., *Federal Agents Storm South Shore Building, Detaining Families and Children*, South Side Weekly (Oct. 6, 2025), <https://southsideweekly.com/federal-agents-storm-south-shore-building-detaining-families-and-children/>.

<sup>16</sup> Cate Cauguiran, et al., *ICE agents raid South Shore Apartments; Trump says Chicago could become military training ground* ABC7, (Oct. 1, 2025), <https://abc7chicago.com/post/ice-chicago-federal-agents-surround-south-shore-apartment-building-dhs-requests-military-deployment-illinois/17908911/>.

<sup>17</sup> Mack Liederman, et al., *Feds Detained 4 Children Who Are US Citizens During Controversial ICE Raid*, Block Club Chicago (Oct. 3, 2025), <https://blockclubchicago.org/2025/10/03/feds-detained-4-children-who-are-us-citizens-during-controversial-ice-raid/>; Rebekah Rless, et al., *37 people arrested and American kids separated from parents*

not permitted to contact attorneys.<sup>18</sup> Over two dozen residents reported that agents entered their apartments without judicial warrants.<sup>19</sup> To date, DHS has not publicly released any judicial warrants authorizing the raid.<sup>20</sup>

U.S. citizens were also caught up in the raid. Federal agents zip-tied and removed U.S. citizens from their apartments, placed them in unmarked vans, and questioned them before ultimately releasing them without charges after several hours of detention.<sup>21</sup> According to complex residents, agents asked U.S. citizens to verify their immigration status and asked whether they “had [arrest] warrants” before agreeing to release them.<sup>22</sup> U.S. citizen residents with outstanding warrants were turned over to Chicago police.<sup>23</sup>

Those residents allowed to return to their apartments after the raid reported overturned mattresses, emptied bookshelves, and paperwork thrown out.<sup>24</sup> Hallways were filled with debris, toys, and personal belongings lay scattered in the aftermath.<sup>25</sup> Residents reported valuable items being stolen from their apartments after agents broke down their doors.<sup>26</sup> Residents have subsequently been ordered to vacate the complex following a separate state foreclosure proceeding.<sup>27</sup>

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*after ICE raid at Chicago apartments*, CNN (Oct. 3, 2025), <https://www.cnn.com/2025/10/03/us/chicago-apartment-ice-raid>.

<sup>18</sup> House Committees on the Judiciary and Homeland Security, Investigation Letter to Secretary Noem and Attorney General Bondi (Oct. 7, 2025), <https://democrats-judiciary.house.gov/media-center/press-releases/judiciary-and-homeland-security-committees-launch-investigation-into-violent-chicago-immigration-raid>

<sup>19</sup> Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

<sup>20</sup> *Id.*

<sup>21</sup> Cindy Hernandez, *Massive immigration raid on Chicago apartment building leaves residents reeling: ‘I feel defeated.’*, Chicago Sun-Times (Oct. 1 2025), <https://chicago.suntimes.com/immigration/2025/10/01/massive-immigration-raid-on-chicago-apartment-building-leaves-residents-reeling-i-feel-defeated>; Mack Liederman, *South Shore Residents Return To Ransacked Apartments After ICE Raid: ‘It Looks Like Hell.’*, Block Club Chicago (Oct. 2, 2025), <https://blockclubchicago.org/2025/10/02/south-shore-residents-return-to-ransacked-apartments-try-to-move-out-after-ice-raid-it-looks-like-hell/>; Sergio Martínez-Beltrán, *Chicago South Shore Building Residents Recount Humiliating Ice Raid*, NPR (Oct. 24, 2025) <https://www.npr.org/2025/10/24/nx-s1-5570113/chicago-south-shore-building-residents-recount-humiliating-ice-raid>; Rebekah Rless, et al., *37 people arrested and American kids separated from parents after ICE raid at Chicago apartments*, CNN (Oct. 3, 2025) <https://www.cnn.com/2025/10/03/us/chicago-apartment-ice-raid>.

<sup>22</sup> Rebekah Rless, et al., *37 people arrested and American kids separated from parents after ICE raid at Chicago apartments*, CNN (Oct. 3, 2025), <https://www.cnn.com/2025/10/03/us/chicago-apartment-ice-raid>.

<sup>23</sup> Melissa Sanchez, et al., “*I Lost Everything*”: *Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

<sup>24</sup> Nicholas Bogel-Burroughs, et al., *A Squalid Building, A Tip to the Feds, and Then ‘Straight-Up Chaos.’* New York Times (Oct. 19, 2025), <https://www.nytimes.com/2025/10/19/us/chicago-south-shores-border-patrol-raid.html>.

<sup>25</sup> Cindy Hernandez, *Massive immigration raid on Chicago apartment building leaves residents reeling: ‘I feel defeated.’*, Chicago Sun-Times (Oct. 1 2025), <https://chicago.suntimes.com/immigration/2025/10/01/massive-immigration-raid-on-chicago-apartment-building-leaves-residents-reeling-i-feel-defeated>.

<sup>26</sup> Mack Liederman, *South Shore Residents Return To Ransacked Apartments After ICE Raid: ‘It Looks Like Hell.’*, Block Club Chicago (Oct. 2, 2025), <https://blockclubchicago.org/2025/10/02/south-shore-residents-return-to-ransacked-apartments-try-to-move-out-after-ice-raid-it-looks-like-hell/>.

<sup>27</sup> Maxwell Evans, *Residents Move Out Of Raided South Shore Building As Court-Ordered Deadline Arrived Friday*, Block Club Chicago, (Dec. 12, 2025), <https://blockclubchicago.org/2025/12/12/residents-move-out-of-raided-south-shore-building-as-court-ordered-deadline-arrives-friday/>.

On January 21, 2026, the Illinois Department of Human Rights (“IDHR”) filed a charge against the complex owner (7500 Shore A LLC),<sup>28</sup> the complex registered manager (Trinity Flood), and the believed complex property management (Strength in Management LLC) for violations of the Illinois Human Rights Act. IDHR later amended the charge and added additional respondents.<sup>29</sup> The charge alleges that the complex management sought to intimidate and coerce Black and Latino individuals residing at the complex to leave their apartments.<sup>30</sup> After refusing to maintain the property or make needed repairs, the complex management contacted federal authorities alleging there were unauthorized, Venezuelan occupants at the complex, who had threatened other tenants. Upon information and belief, this unlawful communication is what led to the complex raid on or about September 30, 2025. The charge further alleges that the complex management aided and abetted the federal government in executing the raid.<sup>31</sup>

The raid was reportedly carried out as part of “Operation Midway Blitz,” a federal immigration enforcement effort launched in September 2025 in the Chicago metropolitan area—itsself part of a series of immigration crackdowns in cities nationwide.<sup>32</sup> The raid was perhaps the largest and most dramatic raid in Chicago, but just one of many aggressive and heavy-handed tactics deployed as part of the Midway Blitz immigration crackdown and similar operations elsewhere.<sup>33</sup> The raid came at the tail end of the first month of Midway Blitz, during which more than 1,000 immigrants were reportedly arrested.<sup>34</sup>

According to DHS, the September 30th raid was a “targeted operation” that resulted in the arrest of 37 purportedly undocumented immigrants from Venezuela, Mexico, Colombia and Nigeria, including alleged “Tren de Aragua<sup>35</sup> gang members and violent criminals.”<sup>36</sup> Senior administration officials, including White House homeland security adviser Stephen Miller, declared that the building was “filled with [Tren de Aragua] terrorists” and called the operation one of “the most successful law enforcement operations” in the country's history.<sup>37</sup> Those claims, however, were

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<sup>28</sup> *Ill. Dept. of Human Rights v. Trinity Flood, et al.*, IDHR Charge No. 2026CH0843 (filed Sep. 30, 2025), available at <https://dhr.illinois.gov/content/dam/soi/en/web/dhr/documents/IDHR%20Department%20Initiated%20Charge%2026CH0843%20ShareVersion-Redacted.pdf>.

<sup>29</sup> *Ill. Dept. of Human Rights v. Trinity Flood, et al.*, IDHR Charge No. 2026CH0843 (filed Mar. 25, 2026), available at <https://dhr.illinois.gov/content/dam/soi/en/web/dhr/documents/2026CH0843-IDHR-Initiated-Charge-Amendment-1-Redacted.pdf>.

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> Cindy Hernandez, *Massive immigration raid on Chicago apartment building leaves residents reeling: ‘I feel defeated.’*, Chicago Sun-Times (Oct. 1 2025), <https://chicago.suntimes.com/immigration/2025/10/01/massive-immigration-raid-on-chicago-apartment-building-leaves-residents-reeling-i-feel-defeated>.

<sup>33</sup> *Id.*

<sup>34</sup> Sophia Tareen, *Using helicopters and chemical agents, immigration agents become increasingly aggressive in Chicago*, AP (Oct. 6, 2025) <https://apnews.com/article/chicago-immigration-federal-arrests-helicopter-trump-ice-8dbf688f78f3b6d1b8fdb989557b28c4>.

<sup>35</sup> Lisa Lambert, *What is Tren De Aragua, the Venezuelan gang targeted by Trump?*, BBC (Mar. 17, 2025), <https://www.bbc.com/news/articles/cr421q5zl69o>.

<sup>36</sup> Department of Homeland Security, *DHS Debunks Governor Pritzker’s Harmful Lies about Operation Midway Blitz in Chicago, Federal Law Enforcement*, DHS.gov/news (Oct. 6, 2025), <https://www.dhs.gov/news/2025/10/06/dhs-debunks-governor-pritzkers-harmful-lies-about-operation-midway-blitz-chicago>

<sup>37</sup> Melissa Sanchez, et al., *“I Lost Everything”: Venezuelans Were Rounded Up in a Dramatic Midnight Raid but Never Charged With a Crime*, ProPublica (Nov. 13, 2025), <https://www.propublica.org/article/chicago-venezuela-immigration-ice-fbi-raids-no-criminal-charges>.

unsubstantiated. There is no evidence that anyone in the building was a “terrorist” or a member of Tren de Aragua. There has been no information released by the federal government—and none reported by the media or independent investigations—that anyone living in the building had significant criminal history or confirmed gang membership. To date, there is no record of federal criminal charges being filed against anyone arrested in the raid.<sup>38</sup> DHS arrest records for two individuals arrested in the raid, and which describe the basis for the operation, make no mention of Tren de Aragua.<sup>39</sup> On information and belief, none of the immigrants arrested in the raid have been deported based on supposed Tren de Aragua affiliation or activities.

On information and belief, all the non-U.S. citizens arrested during the raid were taken to the ICE holding facility in Broadview, Illinois (“Broadview”) and initially detained there in deplorable conditions. Broadview is a small low-slung brick building that contains only four hold rooms and two isolation cells. The conditions inside Broadview at the time were horrendous.<sup>40</sup> The hold rooms were overcrowded. It is a holding facility and so not intended for overnight detention.<sup>41</sup> But at the time of the raid, people were being held for days at a time. There was no bedding and not enough seating, so people were forced to sleep on the floor, one against the other, sometimes next to the open toilets in each hold room.<sup>42</sup> Detained people were not provided adequate food or water.<sup>43</sup> They were not provided hygiene products and could not shower or otherwise clean themselves.<sup>44</sup> There were no proper facilities for babies or children. Hold rooms were often filthy and were not properly cleaned. There was no medical staff at all on site and people were regularly denied access to medical care and their prescriptions. Broadview was subject to a federal conditions lawsuit soon after the raid and is currently being operated under a judicial temporary restraining order.<sup>45</sup>

After Broadview, many of the immigrants who were detained in the raid were transferred to ICE detention facilities around the country with equally horrible detention conditions.

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<sup>38</sup> Melissa Sanchez and Jodi S. Cohen, *The Real Story Behind the Midnight Immigration Raid on a Chicago Apartment Building*, ProPublica (Feb. 4, 2026) <https://www.propublica.org/article/chicago-venezuela-immigration-ice-raid-landlord-tren-de-aragua>.

<sup>39</sup> *Id.*

<sup>40</sup> Christine Fernando, *Judge Orders Improvements at Broadview ICE Facility After Claims of Inhumane Conditions*, PBS News (Nov. 5, 2025), <https://www.pbs.org/newshour/politics/judge-orders-improvements-at-broadview-ice-facility-after-claims-of-inhumane-conditions>.

<sup>41</sup> Olivia Olander, “Dehumanizing”: *Inside the Broadview ICE Facility Where Immigrants Sleep on Cold Concrete*, Chi. Trib. (Aug. 3, 2025), <https://www.chicagotribune.com/2025/08/03/dehumanizing-inside-the-broadview-ice-facility-where-immigrants-sleep-on-cold-concrete/>.

<sup>42</sup> *Id.*

<sup>43</sup> *Id.*

<sup>44</sup> *Id.*

<sup>45</sup> Christine Fernando, *Judge Orders Improvements at Broadview ICE Facility After Claims of Inhumane Conditions*, PBS News (Nov. 5, 2025), <https://www.pbs.org/newshour/politics/judge-orders-improvements-at-broadview-ice-facility-after-claims-of-inhumane-conditions>.

B. ██████████ ██████████: Background & Personal Experiences on September 30, 2025

a. Background

██████████ (“Mr. ██████████”) moved to apartment 215 at 7500 S. South Shore Dr., Chicago, IL 60649, in or around May 2025. He lived there until on or about September 30, 2025, when he was arrested during the raid.

b. The Raid on September 30, 2025

On or about September 30, 2025, Mr. ██████████ was fast asleep when a loud sound woke him up. Mr. ██████████ stood up from his bed after he heard the noise. Before Mr. ██████████ had time to react, a large black dog entered his bedroom and attacked his right leg. The dog bit down forcibly on Mr. ██████████’s leg and refused to release him. Mr. ██████████ fell to the ground shortly after the dog bit his leg. The dog also bit Mr. ██████████’s hips and left hand. Mr. ██████████ was paralyzed by pain and fear.

While the dog bit down on Mr. ██████████’s leg, approximately four or five agents armed with long rifles entered his bedroom. The agents were wearing black clothes and tactical vests. One agent wore a vest that had “K9” printed on it. Mr. ██████████ had no idea why there were armed agents inside his apartment. The agents did not show Mr. ██████████ a judicial warrant or any other warrant, and Mr. ██████████ did not give the agents permission to enter his apartment.

The dog eventually released Mr. ██████████’s leg and retreated away. Mr. ██████████’s leg was bleeding profusely, and he was shocked by the pain he was experiencing. The agents then approached Mr. ██████████ and forcibly rolled him over onto his side and placed zip ties on his wrists. Then, several agents grabbed him, forced him to stand up, and took him outside of his apartment and into the hallway. At gunpoint, the agents walked Mr. ██████████ to another apartment on the same floor. Mr. ██████████’s leg was in extreme pain and he limped the entire way. Mr. ██████████’s leg was still bleeding profusely when he got to the other apartment.

In the other apartment, there were several other building residents detained inside. Mr. ██████████ laid on the apartment floor because he was in agonizing pain from the dog bite. About two agents knelt on the floor next to Mr. ██████████ and placed pressure on his wound with their hands. Mr. ██████████ was screaming due to the amount of pain he felt. After Mr. ██████████ laid on the floor for some time, the agents instructed all male detainees to form a single file line. The agents lifted Mr. ██████████ up onto his left leg and prepared to take him out of the apartment. Once all the male detainees lined up, the agents walked the men out of the apartment at gunpoint. Agents forced Mr. ██████████ into a stairwell, and then out of the complex into a parking lot area.

Once outside, Mr. ██████████ noticed that there was a camera crew recording. The camera crew pointed their cameras directly at Mr. ██████████. The camera crew was masked, so Mr. ██████████ could not identify them. Mr. ██████████ also saw a drone hovering outside the property.

Two agents separated Mr. ██████████ from the other male detainees. The agents placed Mr. ██████████ on the ground in the parking lot and continued to apply pressure on his wound. Mr. ██████████’s leg was gravely injured and did not stop bleeding. Mr. ██████████ was crying due to the

pain. While the agents pressed on his leg, Mr. ██████ asked the agents if he was allowed to return to his apartment to retrieve his belongings, but they denied his request. Two agents then loaded Mr. ██████ into an SUV.

When Mr. ██████ got into the SUV, there were two agents sitting inside. The agents took Mr. ██████ to Loyola University Hospital to treat his leg wound. At the hospital, Mr. ██████ received several stitches to seal his leg wound. Mr. ██████ was only in the hospital for a few hours. Agents guarded Mr. ██████ the entire time at the hospital. Mr. ██████ received a prescription for antibiotics and pain medication from his treating doctors prior to his discharge from the hospital. Afterwards, the agents guarding Mr. ██████ loaded him back into an SUV and drove him to a processing center, outside of Chicago. Mr. ██████ did not have the chance to fill his prescription because the agents transported him directly to a processing center. Upon information and belief, he was taken to Broadview Processing Center.

### c. Detention Following the Raid

At Broadview, Mr. ██████ was exposed to harsh conditions. Agents placed Mr. ██████ in a crowded holding cell with dozens of other male detainees. There was limited room to sit inside the holding cell, much less to lay down. The lights were on inside the holding cell at all times, including at night time, and Mr. ██████ felt very cold while in the holding cell. There was only one toilet for the dozens of detainees to share, and the detainees had no privacy while using the toilet. While Mr. ██████ was at Broadview, his leg was still in excruciating pain.

Mr. ██████ slept at Broadview for one night. The next day, on or around October 01, 2025, agents transported Mr. ██████ to Clay County Jail in Indiana, where Mr. ██████ was exposed to even harsher conditions. At Clay County Jail, Mr. ██████'s leg was still in great pain. Mr. ██████ had some access to pain medications and antibiotics, but the medications were not alleviating his pain. He was in excruciating pain for days, and at one point during his detention at Clay County, Mr. ██████'s leg wound became infected. Mr. ██████ requested other medicine to manage his symptoms, but his access to medical care at Clay County jail was very limited. Several days passed before Mr. ██████ was able to receive new antibiotics and pain medication to manage his pain and inflammation. It took several weeks for his leg to heal.

Aside from the debilitating leg pain, Mr. ██████ became sick while at Clay County jail. The cells were very cold, as well as the water in the showers. Mr. ██████ felt himself shivering at all hours of the day. He found it incredibly difficult to fall asleep in those conditions.

After approximately three months in detention at Clay County Jail, agents transferred Mr. ██████ to Kenton County Jail in Kentucky. Mr. ██████ sought psychiatric assistance at Kenton County Jail because the conditions were overwhelming him. Mr. ██████ was detained at Kenton County Jail for approximately nine weeks until he was released in or around March of 2026.

## 9. Property Damages

Following and as a result of the raid, the breach of his apartment, and arrest, Mr. [REDACTED] suffered significant loss of personal property. Mr. [REDACTED]'s personal possessions, including furniture, clothes, and other personal effects, were damaged, disposed of, or stolen from his apartment. Among other property, Mr. [REDACTED] lost his immigration documents, a backpack with approximately \$1,300 in cash, five pairs of shoes, his wallet, an identification card and other important documents.

## 10. Personal Injury

Damages are owed to Mr. [REDACTED]. Agents of the Government Agencies unlawfully entered his apartment without a warrant, pointed their weapons at him, unlawfully detained him, grabbed him, shoved him, and arrested him.

The agents' actions caused Mr. [REDACTED] severe emotional distress and physical injuries. From the moment agents unlawfully entered his apartment he has suffered from severe emotional distress. He was traumatized by the agents' actions during the raid on or about September 30, 2025. As a result of the trauma, Mr. [REDACTED] continues to experience stress, anxiety, and difficulty sleeping.

Mr. [REDACTED] also suffered physical injury. During the raid, Mr. [REDACTED] was bit by a dog that led to an injury that required medical attention. Upon information and belief, the dog is a law enforcement dog. As a result of the injury, Mr. [REDACTED] suffered from excruciating pain. Mr. [REDACTED] required stitches and medication to treat his wound.

## 11. Witnesses

Possible witnesses include the following: Multiple employees of the Government Agencies, and each entity's contractors, who had contact with or reviewed records related to Mr. [REDACTED] from the time of his initial arrest and detention; employees of the Government Agencies involved in developing and carrying out the raid on or approximately on September 30, 2025; other individuals whom employees of the Government Agencies arrested and detained during the raid on September 30, 2025; any local law enforcement agents or officials who participated in the raid in any capacity; the individuals who were filming the raid; the owners of the complex; the management company of the complex; individuals who witnessed the raid as bystanders; and any residents or other individuals who were at or near the property during the raid; the many individuals with whom Mr. [REDACTED] was detained with in Illinois and other states.

Other residents at the property during the raid, who are filing administrative claims similar to this one, are represented by undersigned Counsel and may be contacted through Counsel. They are:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**12. Amount of Claim**

Mr. [REDACTED] is owed damages in the amount of \$5,002,000.

**13b. Phone Number of Person Signing Form**

If any additional information is required to expedite this request, please contact Susana Sandoval Vargas, MALDEF at [ssandovalvargas@maldef.org](mailto:ssandovalvargas@maldef.org).