

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

Claimant: ██████ (“Ms. ██████”)

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. Ms. ██████ reserves the right to amend or supplement her 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 Ms. ██████. To the extent other federal employees or agents were involved in the arrest and detention of Ms. ██████, 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 Ms. ██████’s detention, which originated from the agents’ conduct on or about September 30, 2025. Agents of the Government Agencies arrested and detained Ms. ██████ on or around September 30, 2025, and continued to detain Ms. ██████ until on or about October 21, 2025.

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

Agents of the Government Agencies arrested and detained Ms. ██████ in the A.M. on or about September 30, 2025, and continued to detain Ms. ██████ until on or about October 21, 2025.

8. Basis of Claim

Ms. ██████ 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, 60649.¹ 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.² The agents were masked and wearing tactical gear.³ 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.⁴ Agents were followed by a government camera crew and drones as they carried out the operation.⁵ DHS posted video footage of the raid on social media, showing agents breaching doors and angling weapons into apartments in the complex.⁶

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

¹ 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/>.

² 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>

³ 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/>.

⁴ 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>.

⁵ 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>.

⁶ 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>

⁷ 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; 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.⁸ Agents reportedly pointed their guns at residents, pulled them from their beds, restrained them with zip ties, and marched them out of the building.⁹ At least six residents reported that agents physically struck or kicked them.¹⁰ A law enforcement dog bit a resident, leaving blood on the floor of an apartment.¹¹ In at least one apartment, agents forced a resident to his knees while his 6-year-old nephew clung to him, sobbing.¹²

Residents reported not having enough time to clothe themselves or their children before being dragged from their apartments.¹³ 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.¹⁴ 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.¹⁵ Residents appeared to be separated by race and ethnicity.¹⁶ Children were zip-tied to one another and separated from their parents, who were loaded into separate trucks and vans.¹⁷ Detainees were not told why they were being held and were

⁸ 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>.

⁹ 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>.

¹⁰ 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>.

¹¹ *Id.*

¹² *Id.*

¹³ *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/>.

¹⁴ 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>.

¹⁵ *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/>.

¹⁶ 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/>.

¹⁷ 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.¹⁸ Over two dozen residents reported that agents entered their apartments without judicial warrants.¹⁹ To date, DHS has not publicly released any judicial warrants authorizing the raid.²⁰

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.²¹ 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.²² U.S. citizen residents with outstanding warrants were turned over to Chicago police.²³

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

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

¹⁸ 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>

¹⁹ 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>.

²⁰ *Id.*

²¹ 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>.

²² 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>.

²³ 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>.

²⁴ 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>.

²⁵ 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>.

²⁶ 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/>.

²⁷ 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),²⁸ 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.²⁹ The charge alleges that the complex management sought to intimidate and coerce Black and Latino individuals residing at the complex to leave their apartments.³⁰ 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.³¹

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.³² 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.³³ The raid came at the tail end of the first month of Midway Blitz, during which more than 1,000 immigrants were reportedly arrested.³⁴

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 Aragua³⁵ gang members and violent criminals.”³⁶ 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.³⁷ Those claims, however, were

²⁸ *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>.

²⁹ *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>.

³⁰ *Id.*

³¹ *Id.*

³² 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>.

³³ *Id.*

³⁴ 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>.

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

³⁶ 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>

³⁷ 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.³⁸ 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.³⁹ 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.⁴⁰ The hold rooms were overcrowded. It is a holding facility and so not intended for overnight detention.⁴¹ 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.⁴² Detained people were not provided adequate food or water.⁴³ They were not provided hygiene products and could not shower or otherwise clean themselves.⁴⁴ 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.⁴⁵

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.

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

a. Background

In or around April 2025, ██████████ (“Ms. ██████”) moved into an apartment at 7500 S. South Shore Drive, Chicago, IL 60649, with her two sons Y.P., who was sixteen years old and ██████████, who was twenty years old at the time of the raid. The apartment had

³⁸ 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>.

³⁹ *Id.*

⁴⁰ 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>.

⁴¹ 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/>.

⁴² *Id.*

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ 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>.

a bedroom, a living room, a bathroom, and a kitchen area. Ms. [REDACTED] found out about the apartment complex through one of her acquaintances, who also lived in the complex. Ms. [REDACTED] lived in the complex until she was arrested by federal agents in the raid on or about September 30, 2025.

Approximately three days before the raid, Ms. [REDACTED] saw four men wearing plain clothes enter the complex. She watched the men go from door to door and noticed that the men were writing things down on clipboards. Ms. [REDACTED] approached one of the men, and she asked him what they were doing in the building. The man told Ms. [REDACTED] in Spanish, that they were there to fix the light fixtures in the hallway. Ms. [REDACTED] however, believes the men she saw that day were federal agents.

b. The Raid on September 30, 2025

On or about September 30, 2025, federal agents raided the apartment complex. At that time, Ms. [REDACTED] was asleep in her bed in her apartment. Her son Y.P. was also home, but her oldest son was not because he slept at a friend's apartment.

Loud noises woke Ms. [REDACTED] from her sleep. In the dead of night, she heard loud, pulsing helicopter sounds and the sounds of drones buzzing outside the complex. The sudden noise startled Ms. [REDACTED], so she got out of bed and looked outside her bedroom window. From her bedroom window, she was able to see large crowds of men in green uniforms and she saw a helicopter flying past the complex. Ms. [REDACTED] immediately felt frightened, but she tried to remain calm for Y.P.'s sake. Ms. [REDACTED] walked out of her bedroom and into her living room area. Once she was inside her living room, Ms. [REDACTED] saw bright spot lights beam through her windows. One of the windows in Ms. [REDACTED]'s living room was open, so she could hear a lot of yelling coming from outside the building.

Ms. [REDACTED] looked outside her living room window and saw a rope drop from the roof and land directly outside the open window of her living room. After the rope dropped, Ms. [REDACTED] watched one agent lower himself down the rope outside her window. When the agent appeared right outside her living room window, Ms. [REDACTED] shut the window immediately.

Ms. [REDACTED] feared the agents would enter her apartment. In response, Ms. [REDACTED] told Y.P. to get dressed. Ms. [REDACTED] heard screams coming from outside her apartment. Y.P. ran into his bedroom and quickly changed out of his pajamas into whatever clothes he could find. Ms. [REDACTED] also quickly changed out of her nightclothes. After they both changed their clothes, Ms. [REDACTED] heard what she believed were chains breaking in the hallway outside her apartment. Several apartments on Ms. [REDACTED] floor were locked with security gates and secured by chains, so when she heard chains break, Ms. [REDACTED] believed agents were forcing their way into other units. Ms. [REDACTED] became even more afraid that the agents would enter her apartment at any moment. Ms. [REDACTED] was very afraid that something bad could happen to her or Y.P. and her first priority was protecting Y.P.

Within moments, Ms. [REDACTED] heard agents gathering outside of her door. Ms. [REDACTED] was afraid the agents would force their way into her apartment, so she got close to her door and asked them not to break in. Ms. [REDACTED] tried to tell the agents that she would open the door for them. Ms. [REDACTED] told the agents it would not be necessary to break her door and asked them repeatedly not to break her door down. Despite Ms. [REDACTED]'s pleas, agents broke her door down and one agent immediately entered the apartment. The agent did not produce a judicial warrant or an administrative warrant prior to entering the apartment. Ms. [REDACTED] and Y.P. were standing in the living room when the

agent forced his way into their apartment. At no point did Ms. [REDACTED] give any agent her consent to enter her apartment. The agent told Ms. [REDACTED] and Y.P. not to move, in Spanish. The agent did not identify himself or provide a reason for why he was inside the apartment. Ms. [REDACTED] had a view of her hallway after the first agent entered. She could see approximately five or six other agents in the hallway through the doorway. The agents in the hallway had rifles drawn. All of the agents were wearing green uniforms, vests, and face coverings. The agents were also equipped with long rifles and grenades hanging from their vests. The agents outside pointed their weapons at Ms. [REDACTED] and Y.P. from the hallway.

Additional agents entered Ms. [REDACTED]'s apartment after the first agent told Ms. [REDACTED] and Y.P. not to move. The agents ordered Ms. [REDACTED] and Y.P. to remain in place. The agents inside the living room yelled at Ms. [REDACTED] demanding to know if there were other people inside the apartment. One or two of the agents spoke Spanish, but the rest of the agents yelled at Ms. [REDACTED] in English. Ms. [REDACTED] could only communicate with the Spanish speaking agents. Ms. [REDACTED] told the agents that there were no other people in the apartment, but the agents continued searching the rest of her apartment. Some of the English speaking agents yelled additional commands at Ms. [REDACTED] but Ms. [REDACTED] could not understand them because she did not understand English. None of the agents identified themselves to Ms. [REDACTED] or to Y.P. None of the agents showed Ms. [REDACTED] a signed judicial warrant or any other warrant. None of the agents told Ms. [REDACTED] why they were inside her apartment. And none of the agents called her or Y.P. by their names. Ms. [REDACTED] was confused and afraid, and she had no idea what the agents were looking for inside her apartment or why the agents were there.

The agents did not allow Ms. [REDACTED] or Y.P. to leave the apartment during the search. The Spanish speaking agents continued to tell Ms. [REDACTED] and Y.P. not to move. Some agents remained next to Ms. [REDACTED] and Y.P., with their weapons drawn, while the others searched the apartment. Ms. [REDACTED] watched agents break her personal possessions as they rummaged through her apartment. Ms. [REDACTED] was deeply afraid because the agents were pointing their guns at her and her son. The agents did not ask Ms. [REDACTED] or Y.P. to identify themselves, nor did the agents ask Ms. [REDACTED] or Y.P. about their current immigration status. Y.P. was in visible distress and told Ms. [REDACTED] that he felt like he was going to faint. Ms. [REDACTED] saw that Y.P.'s lips were turning white, his face was pale, and his body was shaking in fear. Ms. [REDACTED] believed that Y.P. was having an anxiety attack, so she tried to help him stay calm. In reality, Ms. [REDACTED] was equally terrified. Ms. [REDACTED] and Y.P. remained in place as instructed.

After several minutes, two agents grabbed Ms. [REDACTED] and Y.P. and forced them out of their apartment and into the hallway. Agents did not allow Ms. [REDACTED] to retrieve any belongings or personal documents before they forcibly removed her from the apartment. The agents escorted Ms. [REDACTED] and Y.P. at gunpoint to another apartment on the second floor. Once they entered the second apartment, Ms. [REDACTED] and Y.P. saw men, women and children detained in this apartment. Ms. [REDACTED] saw about ten or fifteen people detained inside the apartment.

While in this second apartment, Ms. [REDACTED] and Y.P. saw agents beat several detainees in the living room. For example, Ms. [REDACTED] and Y.P. saw agents hit one man with what appeared to be the butt of a rifle. They also saw agents circle one man, who was laying on the ground, and kick him while he was on the ground. Another detainee was also on the living room floor, bloodied, and Ms. [REDACTED]

noticed a lot of blood on the floor next to him. Some of the other detainees told Ms. [REDACTED] that the bloodied man had been wounded by a dog.

As he watched the beatings and saw all the blood on the ground, Y.P. shook even more and was hyperventilating. An agent escorted Y.P. and Ms. [REDACTED] into a bedroom and closed the door. Adults and children were also detained in this separate bedroom. The remainder of the detainees remained in the living room area. Ms. [REDACTED] held Y.P.'s hand as he laid on one of the beds to calm him down. While inside the bedroom, Ms. [REDACTED] and Y.P. could hear horrible screams and pounding sounds coming from the living room. Ms. [REDACTED] believed the agents were still beating some of the detainees on the other side of the door and causing them terrible pain. Ms. [REDACTED] and Y.P. waited in the bedroom until agents escorted Ms. [REDACTED], Y.P., and the other detainees that were in the bedroom back into the living room.

Once Ms. [REDACTED] and Y.P. returned to the living room with the other detainees, the agents instructed the men to line up in a single file line. The agents shoved Ms. [REDACTED] and tried to grab Y.P. to put him in line with the other men, but Ms. [REDACTED] held tightly onto her son and told the agents that he was a minor. Y.P. was able to remain with his mother as the agents escorted all of the men out of the apartment. After the men were escorted away, the agents ordered all the women and children, including Y.P. and Ms. [REDACTED] to form a single-file line. Then, the agents escorted them into the hallway, down a stairwell, and out of the building into a parking lot. The agents held Ms. [REDACTED], Y.P. and the other detainees at gunpoint while escorting them out.

In the parking lot, agents placed zip ties on Ms. [REDACTED], Y.P., and some the other detainees. Ms. [REDACTED] noticed that there were men recording the detainees with cameras. Ms. [REDACTED] and Y.P. also saw drones flying overhead. After a brief time in the parking lot, agents placed Ms. [REDACTED] and her son into a white van with other women and children. Agents did not speak to Ms. [REDACTED] or Y.P. inside the van, and did not ask for any documentation or for Ms. [REDACTED] or Y.P.'s immigration status.

c. Detention Following the Raid

Upon information and belief, agents transported Ms. [REDACTED] and Y.P. to the Broadview ICE processing facility outside of Chicago. While at Broadview, agents placed Ms. [REDACTED] and her son in a crowded holding cell with several other families. Ms. [REDACTED] and Y.P. had to share a single toilet with dozens of other detainees in the holding cell. The detainees routinely had to step in front of the toilet and physically cover one another to create a semblance of privacy while they used the toilet. There was limited space to lay down in the crowded holding cell and the lights were on at all times—including at night. After about one day at Broadview, agents transported Ms. [REDACTED] and her son to a hotel, where they stayed for one night before being flown to the Dilley Immigration Processing Center in Texas. Ms. [REDACTED] and her son were detained at the Dilley Center from on or about October 01, 2025, to on or about October 21, 2025. On or about October 21, 2025, Ms. [REDACTED] was released on electronic monitoring and Y.P. was released into Ms. [REDACTED]'s care.

9. Property Damages

As a result of the raid on or about September 30, 2025, Ms. [REDACTED]'s apartment was left unsecured. The agents forcibly opened her apartment and did not lock the door after exiting the unit. Ms.

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

12. Amount of Claim

Ms. [REDACTED] is owed damages in the amount of \$5,003,000.

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.