B. Johandry José Andrades Jiménez: Background & Personal Experiences on September 30, 2025

a. Background

Johandry José Andrades Jiménez ("Mr. Andrades Jiménez") lived at an apartment at 7500 S. South Shore Drive, Chicago, Illinois 60649, with his wife, Yelianni Nicole Primera Herreras, and their three daughters who were, at the time of the raid, approximately 3 years old, 1.5 years old, and 6 months old.

b. The Raid on September 30, 2025

Mr. Andrades Jiménez was asleep at home when his wife woke him in the early hours of September 30, 2025, after she heard helicopters and loud activity in and around the building. Mr. Andrades Jiménez got up and saw that there were agents and men dressed in military uniforms outside the building. Mr. Andrades Jimenéz could hear agents breaking down other doors in the building. Within a few minutes, agents approached Mr. Andrades Jiménez's door. Agents were yelling aggressively, "Open the door! Get out! Get Out!" Agents hit the door forcefully twice and breached the door. Four large men armed with guns then entered the apartment.

Upon entering, the four agents, heavily armed, pointed their weapons at Mr. Andrades Jiménez. The agents, who spoke in both English and Spanish, ordered Mr. Andrades Jiménez to get on the floor "or I'll kill you." Agents struck Mr. Andrades Jiménez in the head with a rifle and threw him to the floor. They did this in front of his wife and children, who were crying. Agents restrained Mr. Andrades Jiménez with plastic zip ties. After Mr. Andrades Jiménez was on the floor and zip-tied, agents asked him if he was Tren de Aragua. Mr. Andrades Jiménez responded that he was not. Agents continued to restrain him and forcibly took him out of his apartment. The armed agents also took his wife, infant, and other two young daughters.

At no time did federal agents knock or ask permission to enter Mr. Andrades Jiménez's family home. Agents did not present a judicial warrant or any other warrant to Mr. Andrades Jiménez or his family. Agents did not explain the basis for entering the apartment or seizing any member of the family. At no point did Mr. Andrades Jiménez see or hear about any document authorizing entry into his apartment, his arrest, or the arrest of his wife and children, and no agent explained the basis for doing so.

At the time agents entered his apartment, Mr. Andrades Jiménez was not fully clothed. After being awoken by his wife, he had only put on shorts and was not wearing a shirt. His wife and children were also not fully dressed. Agents did not give Mr. Andrades Jiménez, his wife, baby, and small daughters any opportunity to dress or find clothes. Agents took Mr. Andrades Jiménez out of his apartment half-clothed and shirtless. His wife and children were also taken out of the apartment not properly clothed.

After agents removed Mr. Andrades Jiménez from his apartment they held him, his wife, and his daughters temporarily in another apartment on the same floor with approximately 5 other residents. He noticed that one of the other residents appeared to have been struck. After approximately 10 minutes, agents forced Mr. Andrades Jiménez out of that apartment and walked him and his family downstairs and outside. During this process agents pointed their firearms at him and others.

c. Detention Following the Raid

Agents separated Mr. Andrades Jiménez from his wife and daughters. They placed him into a van with approximately 15 other men who had been arrested. Upon information and belief, agents then drove him to the ICE holding facility in Broadview, Illinois ("Broadview"), where he was held in terribly crowded conditions in a single room with approximately 40 other people. At Broadview, Mr. Andrades Jiménez was deprived of adequate basic necessities, including water. The only food provided was bread with a piece of ham. There was not enough space to sleep. Mr. Andrades Jimenéz remained shirtless, only wearing shorts, until he was eventually given a shirt.

Then, agents transferred Mr. Andrades Jiménez through multiple detention facilities while in federal custody, including facilities in several different states. In all, Mr. Andrades Jiménez spent more than two months in detention.

Throughout his detention, Mr. Andrades Jiménez suffered deprivation of basic necessities and denial of essential medical care, including prescribed medications he required. Mr. Andrades Jiménez had had a significant cardiovascular surgery while living in Chicago and he took multiple prescription medications to manage his condition. He never received any of those prescription medications at Broadview or at any other facility while he was in custody.