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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

BLACK LIVES MATTER LOS
ANGELES, CANGRESS (DBA LA
CAN), STEVEN ROE, NELSON
LOPEZ, TINA CRNKO, JONATHAN
MAYORCA, ABIGAIL RODAS,
KRYSTLE HARTFIELD, NADIA
KHAN, CLARA ARANOVICH,
ALEXANDER STAMM, MAIA
KAZIM, ALICIA BARRERA-
TRUJILLO, SHANNON LEE MOORE,
DEVON YOUNG, LINUS SHENTU,
individually and on behalf of a class of
similarly situated persons,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a
municipal entity, CHIEF MICHEL
MOORE, and DOES 1-10 inclusive,

DEFENDANTS.

Case No.: 2:20-cv-05027 CBM-AS

**APPENDIX OF EVIDENCE
VOLUME I OF II IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR A TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

APPENDIX OF EVIDENCE VOLUME I OF II IN SUPPORT OF PLAINTIFFS'
APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION

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Plaintiffs submit the following evidence in support of their Application for Temporary Restraining Order and Preliminary Injunction.

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4.	Declaration of Tina Črnko
5.	Declaration of Eva Grenier
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7.	Declaration of Maia Kazin
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14.	Declaration of Steven Christian Roe
15.	Declaration of Linus Shentu
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17.	Declaration of Jefferey Trotter
18.	Declaration of Pete White
19.	Declaration of Devon Young
20.	Declaration of Orlando Hinkston

1 DATED: June 24, 2020

**SCHONBRUN SELOW HARRIS
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KAYE, MCLANE,
BEDNARSKI & LITT**

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8 Michael Seplow
9 Aidan McGlaze
10 John Washington
11 *Attorneys for Plaintiffs.*
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EXHIBIT 1

DECLARATION OF MELINA ABDULLAH

I, MELINA ABDULLAH, declare:

1. I am providing this declaration as a representative of the organizational plaintiff, BLACK LIVES MATTER LOS ANGELES (“BLMLA”). I have personal knowledge of the facts contained within this declaration and, if I were called to testify to those facts, I could and would do so competently.
2. BLMLA is an official chapter of the Black Lives Matter Global Network with chapters in major cities in the United States and worldwide, including Los Angeles.
3. BLMLA is one of the largest and most active chapters of the organization, with nearly 500 active members and organized ally groups, including White People for Black Lives. In response to the death of George Floyd, BLMLA sponsored scores of protests in Los Angeles and participated in demonstrations organized by other groups.
4. The demonstrations organized by BLMLA to protest police violence are ongoing and will continue for as long as it takes to make real and lasting change in policing. On average, BLMLA sponsors four demonstrations a week and organizes a weekly demonstration in front of the Hall of Justice in downtown Los Angeles to protest the failure of the Los Angeles District Attorney to prosecute law enforcement for police killings.
5. Defendants’ actions have interfered with BLMLA’s right to assembly and free speech. Defendants’ actions during these protests have impeded the ability of BLMLA to organize future events by instilling fear in its members. Our members who protested police violence during these demonstrations were themselves subjected to unlawful conduct and police violence by the LAPD. The LAPD’s illegal conduct harmed our organization because BLMLA put money and resources into organizing the demonstrations which

1 were then disrupted and illegally shut down during the mass arrests of
2 protesters.

- 3 6. BLMLA plans to assist, plan, participate in, and hold similar events in the
4 future, on its own or in conjunction with others, and is fearful that the police
5 actions in response to these and similar protests will be repeated absent
6 injunctive relief to prohibit the practices, policies, and customs of the
7 LAPD's unlawful conduct.
8

9 I declare under penalty of perjury that the foregoing is true and correct.

0 Executed this 22nd day of June 2020.

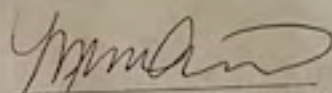
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EXHIBIT 2

DECLARATION OF CLARA ARANOVICH

I, CLARA ARANOVICH, declare:

1. I am a filmmaker living in Los Angeles, California. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On May 30, 2020, I participated in a peaceful demonstration in the Fairfax district to protest racism, police brutality, and, specifically, the killings of George Floyd, Breonna Taylor, and Ahmaud Arbery.
3. It is my understanding that the demonstration continued after a rally organized by Black Lives Matter Los Angeles at Pan Pacific Park. When I arrived at about 5:00 pm, I got in line with a group of protestors who were marching east on 3rd Street toward The Grove Farmer's Market, culminating in a gathered line of demonstrators at the intersection of 3rd and Fairfax Avenue.
4. I observed that police officers formed a line across the street in front of the group of protestors. I joined the protestors who were at the front, closest to the police officers.
5. Just before 6:00 pm, Los Angeles Police Chief Moore addressed the protestors. Initially, he was speaking to the protestors without any amplification, so it was nearly impossible to hear what he was saying at times. He then began using a megaphone that someone handed to him, but it was still difficult to hear amid the noise of the crowd. I did not hear him or anyone else announce that the assembly had been declared unlawful or that we were required to disperse. Chief Moore addressed the crowd in English and I did not hear an announcement being made in any other language.
6. Approximately 30 minutes after Chief Moore spoke, the line of police officers began to move back the frontline of protestors by using aggressive, physical force.
7. As the police officers advanced, they used the ends of their batons to jab people with force in their chest and abdomen area.
8. A police officer hit me using the end of their baton in my chest and abdomen multiple times. I had a painful bruise on my breast in one of the places where I was hit.
9. I also saw police officers striking protestors with their batons in an overhand motion.

1 10. As I was leaving the protest, I was hit with a rubber bullet on my calf. This resulted in a
2 painful welt and the bruise is still visible on my leg as of the date of this declaration.

3 11. I also witnessed the police using some kind of smoke cannisters in their attempts to dispel
4 the crowd.

5 12. While I want to continue to participate in lawful protest activity in public spaces, I know
6 that doing so comes with the risk of being injured again or arrested. I fear that all
7 protestors, particularly Black people and people of color, will continue to be subjected to
8 aggressive and violent behavior from the Los Angeles Police Department when they take
9 to the streets to exercise their rights. I fear that Los Angeles Police Department will not
10 be held accountable for these violations against our bodies and rights.

11
12 I declare under penalty of perjury that the foregoing is true and correct. Executed this
13 day of June 19, 2020.

14 

15 _____
16 CLARA ARANOVICH

EXHIBIT 3

DECLARATION OF ALICIA BARRERA-TRUJILLO

I, Alicia Barrera-Trujillo, declare:

1. I am a plaintiff in this action. I am 21 years old and I am a student at Mt. San Antonio. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On June 1, 2020, I participated in a peaceful demonstration near the Los Angeles Central Library on Fifth Street and Grand Avenue in downtown Los Angeles to protest the killing of George Floyd and other victims of police brutality and racism.
3. I arrived at the Fifth and Grand location at around 2:00 pm with my younger sister and friend. I stood with some protesters who were holding signs. The crowd was very peaceful, I didn't see any property destruction or similar acts taking place on that day. People of all ages appeared to be at the protest. I even saw some families with children holding signs. The protests remained peaceful, safe for families, and friendly from 2:00 p.m. until around 5:00 p.m.
4. At around 4:00 p.m. I started making plans with my friends to leave the area. At the about the same time we got a text saying that the curfew for Los Angeles was 5:00 p.m. I was confused because I also got a text that said that the curfew was at 6:00 p.m. I also recall that I may have gotten another notification saying the curfew was at 8:00 p.m.
5. Between 4:45 p.m. and 5:00 p.m. I was attempting to exit the area when police started to block off streets. Police blocked us in from all sides unable to exit the area. At 5:00 p.m. I received another text about the curfew but by that time I was starting to panic. The entire crowd also appeared to panic as

1 officers encircled the crowd and people tried to leave the area. We were
2 never given a dispersal order and there was no opportunity to leave. A
3 helicopter flew over the crowd and it was very hard to hear. I did not hear a
4 dispersal order or any other announcement coming from the helicopter.

5 6. Around that time I remember feeling really scared as police started firing
6 rubber bullets into the crowd. I started to panic once I saw a police officer
7 use pepper spray on a woman and what appeared to be her daughter. I think
8 the child could not have been much older than eight years old. I remember
9 that the child was crying loudly and both of them seemed to be physically in
10 pain from the pepper spray.

11 7. The police quickly surrounded the crowd and said, "don't move, don't run
12 you are under arrest" People in the crowd kept asking the police "why are
13 we being arrested."

14 8. I was arrested in a was arrested in a large group, around 500 people. The
15 police split up the large group into two smaller groups to conduct arrests. I
16 was arrested by a female officer and separated from my younger sister.

17 9. After being arrested I was searched, handcuffed, booked, and received my
18 citation on the spot before being put on large bus. The police searched my
19 bag and took my ID from my wallet. They then put my belongings under
20 my seat on the bus. We waited on the bus for about an hour before it started
21 moving. The bus took us to Santa Monica area where we waited several
22 hours before being released by LA National Cemetery.

23 10. While we were on the bus, there were no officers supervising us. I recall
24 seeing several people needed medical assistance. We were not allowed
25 bathroom access. One person managed to free herself from her handcuffs so
26 that she could use her phone to call an ambulance for various individuals
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1 who needed help on the bus. The cops only checked in on us when the
2 ambulances arrived.

3 11. In my area on the bus I was with a woman who kept saying that she needed
4 to use the bathroom and was denied access. When we were released by the
5 police, I could see an officer pulled her off the bus in a way that appeared
6 pretty hard and the woman's facial expressions lead me to conclude she was
7 in a great deal of pain. I watched as she started to urinate herself as the
8 officer took her off the bus.

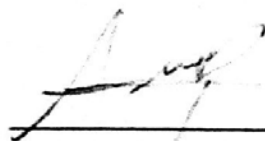
9 12. When we were released my phone was dead so I could not reach out to my
10 friends to pick me up. There were police officers who said they would wait
11 with me and Kim until we were picked up to go home but they did not wait
12 with us at all and yelled at us to go home as they drove away. We saw some
13 NLG volunteers who waited with us until we were able to safely get a ride
14 home.

15 13. At that point I had been in handcuffs from 6:50 p.m. until 4:00 a.m. My
16 wrist area was skinned off from the handcuffs. I was bleeding. It was not
17 until after my release, that another protestor with a medical kit helped me
18 patch up my arm.

19 14. Since that day I have had regular nightmares about the event and have not
20 slept as well as I usually do.

21
22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed this 21 day of June 2020.

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26 ALICIA BARRERA-TRUJILLO
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EXHIBIT 4

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Black Lives Matter Los Angeles, et al.

vs.

City of Los Angeles, et al.

Case No. 2:20-cv-05027-CBM-AS

Hon. Consuelo B. Marshall

DECLARATION OF TINA ČRNKO

I, Tina Črnko, declare and state as follows:

1. I am a recent university graduate residing in Los Angeles, California and have been present at various protests occurring between May 30, 2020 and the current date. The information contained in this declaration is true and accurate to the best of my knowledge. I am of majority age and competent to personally testify to the matters set forth herein.

2. On Saturday May 30, 2020, I was personally subjected to police violence in the form of being hit by rubber bullets and other “non-lethal” projectiles while peacefully protesting within the Fairfax district of Los Angeles.

3. On that day of May 30, my friends and I arrived at a protest organized by Black Lives Matter Los Angeles and other grassroots/activist organizations, scheduled to commence at Pan-Pacific Park in west Los Angeles. By the time I arrived at or around 12:30 pm in the afternoon, the rally had been ongoing for approximately thirty (30) minutes. I participated in a large crowd of protesters that started peacefully marching towards the Beverly Center at approximately 1:00 pm.

4. By 3:00 pm, the crowd of those marching had separated into some three smaller groups. I was part of a group of protesters that were kettled by police officers from the Los Angeles Police Department (LAPD) at the intersection of 3rd St./Edinburgh Avenue. The crowd of which I was part continued to peacefully protest – at times taking a knee – at the intersection for approximately one (1) hour. I did not witness any aggression against police officers at the hands of protesters throughout the entire day of protesting.

DECLARATION OF TINA ČRNKO

1 5. Over time, I witnessed the line of LAPD officers blocking the south end of the
2 intersection becoming increasingly heavily armed such that by approximately 4.30 pm there appeared
3 to be several hundred officers surrounding our group on all sides, armed with riot gear and other forms
4 of crowd-control equipment. We faced the line of officers to the south and kneeled.

5 6. Between approximately 5:15 and 5:30 pm, Chief Michel Moore of the LAPD appeared
6 amongst the line of officers facing our group from the south. We informed Chief Moore that we would
7 not leave and intended to continue peacefully protesting. Chief Moore withdrew the line of officers
8 blocking the south end of the intersection and allowed us to pass through, at which point we marched
9 south on Edinburgh Avenue, proceeded east on Blackburn Avenue and made our way to the
10 intersection of 3rd St/Fairfax Avenue, where I took up position in front of the Starbucks located at
11 north-east end of the intersection.

12 7. By approximately 5:45 pm, large groups of LAPD officers had formed lines blocking
13 west and north points of the 3rd St/Fairfax Avenue intersection. Over the course of time, I observed
14 what appeared to be hundreds of LAPD officers arriving at the 3rd St./Fairfax Avenue intersection,
15 attired in full riot gear and armed with an array of different firearms. Officers formed an impenetrable
16 wall that appeared to be at least ten (10) officers deep, stretching from as far south as Whole Foods to
17 Trade Joes on Fairfax Avenue. A group of some 50-60 protesters formed a line facing west at the
18 intersection, still peacefully protesting, and expressing frustration at the ever-growing number of police
19 officers in riot gear on both ends of Fairfax Avenue. Around this time, I again witnessed Chief Moore
20 appearing from amongst the throng of officers. Chief Moore, attired in full riot gear, made a series of
21 announcements addressed – presumably – at those protesting. However, I was unable to decipher any
22 of Chief Moore's announcements due to the weak volume of the bullhorn he was using.

23 8. At approximately 6:00 pm, I witnessed a panicked group of protesters emerging from
24 behind Citibank on the south end of the 3rd St./Fairfax Avenue intersection, fleeing east on 3rd St.
25 (presumably because officers were advancing towards them) as, contemporaneously, a large group of
26 LAPD officers swarmed into the 3rd St./Fairfax Avenue intersection from the north on Fairfax. I, along
27 with others, started retreating east on 3rd St., but soon realized that this was a false start and quickly
28 resumed position on the northeast corner of 3rd St./Fairfax Avenue. At this juncture, I noticed that a

1 line of LAPD officers was advancing towards us from the west on 3rd St. A gentleman who was
2 positioned further in front of me – facing the line of officers – was aggressively pushed down on the
3 ground by officers and appeared to be arrested. I and others expressed vocal outrage at this
4 unnecessary show of force against a peaceful demonstrator.

5 9. At approximately 6:25 pm, I heard the first rounds of non-lethal ammunition being fired
6 by the advancing officers, and I was struck in the left bicep and ribcage by what appeared to be a round
7 of foam projectiles. As I and others continued to retreat east, rubber bullets were suddenly – and
8 without warning – fired at us by the advancing officers, and I was struck by a rubber bullet on the
9 forehead above my right eye. I immediately lost all sense of hearing except for a loud, continual
10 ringing in both ears and pain reverberating throughout my skull. My forehead was bleeding profusely
11 as a friend pulled me to the side of the road to apply gauze to the wound, and I was informed by a
12 medic present on the scene to immediately seek medical treatment. However, officers were still
13 advancing and firing, forcing us to continue retreating and not allowing for the opportunity to assess
14 and address my wound.

15 10. I was able to shelter at a friend's residence in the Fairfax district, close to the site of the
16 protests and police violence, and immediately sought medical attention at a nearby facility where I
17 received seven individual stitches for the laceration on my forehead. The rubber bullet had torn open
18 the skin on my forehead to the bone. Over the following days, a large swelling appeared above my
19 right eye, resulting in poor eyesight and a yellowish tinge covering the right side of my face. The
20 ringing in my ears – caused by the impact of the rubber bullet – subsided some 48 hours following the
21 injury. However, the excruciating pain persisted. I have likely sustained permanent nerve damage on
22 the top of my skull, and I still experience considerable pain in an area stretching some four inches from
23 the scar on my forehead to the back of my scalp. I have no sensation in the area on my forehead where
24 the skin was torn.

25 11. The experience of police violence – merely for exercising my constitutional rights of
26 free speech and assembly – has been extremely traumatic. I suffer from post-traumatic stress disorder
27 (“PTSD”) associated with the firing of projectiles by officers and feel panic and great distress
28 whenever I hear sudden loud noises (such as fireworks in my neighborhood), and am concerned about

1 the LAPD is present. However, I am also aware that ongoing protests are key to holding police
2 officers and elected officials accountable for the systematic oppression of Black, Brown, and
3 Indigenous Lives in this country, and I intend to continue attending public demonstrations, but fear for
4 my safety in doing so.

5 I declare under penalty of perjury under the laws of the United States and the State of
6 California that the foregoing is true and accurate.

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8 Executed on this 17th of June, 2020 at Los Angeles, California.

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By: Tina Črnko (June 17, 2020 20:53 PDT)

11 Tina Črnko
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1. A class representative represents the interests of all litigation class members in a lawsuit filed to recover money damages for the class.
2. A class representative has claims which are typical of the members of the class. This is known as common issues of law or of fact. For example, as a class representative, your claims against the defendants are typical of the claims of the members of the class against them because each class member incurred damages or injuries as a result of a common event. In this case, the "common event" was the George Floyd protests between May 26, 2020 and June 5, 2020 in Los Angeles. The "common" injuries may include arrest, force by baton or projectiles. For the arrest, the common injuries are tight handcuffs, prolonged detention on a bus, denial of bathroom access, food and water.
3. A class representative always considers the interests of the class as a whole just as his or her own personal interests would be considered.
4. A class representative participates actively in the lawsuit by such things as testifying at deposition and trial, answering written interrogatories, providing information to Attorneys that is felt necessary for the case, and by keeping Attorneys advised of their current whereabouts at all times. It is essential that Attorneys have a means to contact a class representative on very short notice as needs may arise.
5. A class representative recognizes and accepts that any resolution of the lawsuit, such as by settlement or dismissal, is subject to court approval and must be in the best interests of the class as a whole.
6. A class representative accepts the possibility that, in the event the case is lost, the court may assess certain of defendants' costs of litigation against the class representatives. You will not be required to pay any of defendants' costs unless they result from your actions in this litigation – failure to appear for a deposition, failure to provide truthful testimony, failure to maintain contact and cooperation with your attorneys.
7. A class representative is not required to be knowledgeable about the subject of the lawsuit other than what the class representative experienced or observed him/her/their self. However, the class representative should be interested, on a continuous basis, in the progress of the lawsuit, and must make every effort to provide class counsel with all relevant facts.
8. A class representative volunteers to represent many other people with similar claims and damages. The class representative believes that it is important that all benefit from the lawsuit equally because a class lawsuit will save time, money, and effort. Thus, a class action will benefit all parties, and the court. Such an action is an important tool to assure compliance with the law, and to ensure just compensation to all those similarly situated.

I have reviewed the responsibilities of a class representative and acknowledge my duties as such in the proceedings against all defendants named in this lawsuit.

Dated: 17 June 2020

(Signature) 
Tina Grillo (Jun 17, 2020 10:51 PDT)

EXHIBIT 5

;DECLARATION OF EVA GRENIER

I, Eva Grenier, declare:

1. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On May 30th, 2020, I arrived to 3rd and Fairfax Ave around 2:40pm to observe the peaceful march of protestors who had gathered earlier at Pan Pacific Park. This group was protesting the killing of George Floyd and other victims of police brutality and racism. I observed some protesters who were holding signs. The crowd was peaceful. People of all ages appeared to be at the protest. I was wearing my bright green NLG hat at the time and identified myself as a legal observer to anyone who inquired.
3. When I arrived at the protest, officers had formed a scrimmage line on 3rd street at 7930 3rd Ave. As the crowds continued to grow, the officer line retreated back several buildings from the 7930 address on 3rd street. I observed the line as police began using force to push the protestors back. Prior to this, I did not see any provocation by the protestors. During the time that I was present at this area before the police started pushing the protestors back, I did not hear an unlawful assembly declared at this point.
4. At around 3:00 pm, Officer Arrias, who had an identifying helmet number 38654, began shooting rubber bullet projectiles in 2 to 3 second succession at the crowd. Arrias appeared to be aiming into the crowd directly. Many protestors were shot in the legs, including the friend I was with. None of them were engaged in any aggressive or hostile conduct towards the officers.
5. At approximately 3:02 pm, one officer, who did not have an identifying number on the front of his helmet, shoved a protestor about five feet from me. I observed another officer, whose name I believe was Peters but who did not have an identifying number on the front of his helmet, join in and both started shoving and hitting protestors with their batons in the protestors' torso and ribs. A few minutes later, the unidentified officer and Peters were joined by a third officer, Watson, who did not have an identifying number on the front of his helmet. All three were shoving protestors and hitting them directly with batons in their torsos and ribs. I observed all three officers also began swinging and hitting protestors' legs. Officer Watson hit me in the stomach with his baton. Officers

1 paused for a minute or two and then began marching toward the protestors and swinging
2 batons again around 3:06pm. I observed one woman who appeared to me was visibly in
3 pain as officers continued to hit her. Officer Watson hit me again multiple times,
4 specifically in the stomach and arm. I screamed in pain multiple times. The hits to my
5 arm caused bruising. I had not done anything to provoke this assault.

6 6. At this point, I could also see officers shoot some type of concussion flash projectiles into
7 the crowd. The projectiles emitted smoke, a loud bang noise, and some type of
8 combustion. I believe that Officer Martin shot these from a weapon he had.

9 7. At around 3:11pm, officers began to swing batons and march against the crowd again. I
10 saw specifically Officer Rodriguez, helmet number 38654, advance upon the crowd
11 swinging his baton wildly. He made one particularly hard right swipe towards the heads
12 of some of the protestors, holding his baton like it was a baseball bat. At about the same
13 time, I observed Officer Salazar, helmet number 36860, begin running towards protestors
14 holding his baton like a battering ram. An officer whose helmet number was 40558 also
15 made three-foot lunges towards the crowd jabbing his baton into the rib region of
16 protestors. I observed multiple protestors fell to the ground as officers lunged and swung
17 batons against the group. At this point no audible or recognizable dispersal order had
18 been made while I was present.

19 8. Officer Watson again advanced toward me. He hit me with his baton at least two more
20 times. Again, I had not engaged in any aggressive, violent or provocative conduct, nor
21 had I seen anyone around me do so. Protestors were yelling at the police to stop pushing
22 them but were not attacking the police. I also observed multiple officers continue to
23 swing their batons indiscriminately and strike protestors.

24 9. Starting at about 3:17pm, Officer Watson, Officer Peters, the third unidentified Officer
25 and Officer Martin again began advancing on the protestors closest to me and I observed
26 Officer Martin shoot projectiles into the crowd from approximately 2-3 feet in front of
27 the protestors. These projectiles caused smoke, a loud bang, and some type of combustion
28 as all three officers continued to push, shove, and hit protestors with their batons.

10. As the officers continued to attack the protestors with batons and to throw some type of
flash explosives in the crowd, I heard officers near me say they were going to push
protestors back 15 feet.

1 11. I saw multiple protestors with injuries caused by the police use of force. One protestor
2 suffered an injury to his eye and received medical support from a volunteer medic. One
3 protestor could not walk on her own and required physical support from two volunteers to
4 walk and get to safety.

5 12. I left about 3:40 p.m. I experienced bruising and contusions on both legs and my right
6 arm. I experienced pain from these injuries for at least five days after the protest. For the
7 next few days, I also had trouble sleeping and experienced recurring flashbacks. I had and
8 continue to have nightmares since that day.

9 13. The photographs attached to my declaration illustrate several of the bruises resulting from
10 the baton strikes by officers.

11 I declare under penalty of perjury that the foregoing is true and correct. Executed this 23 day
12 of June 2020.

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15 EVA GRENIER
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EXHIBIT 6

DECLARATION OF KRYSTLE HARTSFIELD

I, KRYSTLE HARTSFIELD, hereby declare and say as follows:

1. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On May 30, 2020, I participated in a peaceful demonstration in the Fairfax area of Los Angeles to protest the death of George Floyd by police officers from the Minneapolis Police Department.
3. I am employed as an Artist Manager for a Music Entertainment company in Los Angeles. While I was participating in the demonstration near the Trader Joe's on Third Street and Fairfax Avenue, officers began to physically direct the movement of the group of protesters I was in. A short time thereafter, at around 3:30 p.m., a dispersal order was given.
4. At the point the dispersal order was given, we were directed to leave via the alleyway next to the Trader Joe's. So, following the order, I began to leave the area and was walking away, when I heard an officer say "don't let them leave. Several officers surrounded me and blocked me off. As they did this, one of the other female protesters grabbed my hand and repeatedly said, "don't round her up – don't round her up" but the officers pulled her away from me and pushed me into the parking lot near the alley. At that point I was handcuffed.

5. My friend and Artist, Chika, with whom I attended the demonstration, was walking in front of me and turned around just in time to see an officer give the order to get me specifically. The officer said “get her with the phone”. Chika was subsequently pushed into the parking lot with me. I heard Chika ask the officers why they were detaining me. Then, an officer said, “get her too” – referring to Chika. After I was suppressed back into the parking lot, an officer I understand to be Officer Terrence, pulled my cell phone out of my hand and put it in my purse. I had been using my cellphone to record video of what was happening.

6. After handcuffing us behind our backs, the officers then walked us across the street and put us up against a wall on Third Street near a store called “Wow LA.” The officers required us to stand there against the wall for two hours. I observed that Chika appeared to be in great discomfort from her handcuffs. I also saw the lack of circulation in another protesters’ wrists. So, I asked an officer for some help with Chika’s handcuffs. The officer told me, “we don’t have supplies to take them off.” I then asked if the officers had been trained as to how to take them off. An officer said, “no.” Some time later, an officer came and added an additional set of handcuffs to Chika’s and the one other protester’s to relieve that pain and pressure. However, other protesters that I saw who were also in pain from tight handcuffs were not given an adjustment. An officer said, “we do not have additional handcuffs to do this for the other protesters.”

7. While we were handcuffed standing up against the wall, one of the officers came up to me and said, "I saw you guys, you were walking away." So, I asked why he did not help us. He responded that they have to follow "once the arresting officer gives the order."

8. We were then put on a van and told we would be taken to downtown Los Angeles for booking. However, instead, we were taken to Van Nuys. The bus we were transported on had 12 to 15 individual cages and each protester was put in one, including me, with the handcuffs on and hands behind our backs. Even so, we were not six feet apart. The buses were extremely dirty and not sanitized according to the CDC regulations for COVID-19. While we were protesting we had on masks, on the bus we did not, many of the protesters masks were removed during detainment and could not be reapplied due to the handcuffs.

9. While I was on the bus, I observed multiple protesters complain about painfully tight handcuffs, that they needed water and that they needed to use the bathroom. Once we arrived at the station in Van Nuys, we were taken off the bus two at a time for processing. An 8:30p.m. curfew was issued that night while we were detained.

10. By the time I was taken off the bus, I was past the 8:30 curfew when I was unhandcuffed and processed for release. At that time, I asked, "How are people supposed to get home." An officer then told me that we can't stand outside the police station or we will be taken inside and booked. Fortunately for me, members

of my family followed the bus to the police station when we were first arrested, so I had a ride home.

11. I signed the citation and I was told to stand along the wall to wait for others to be released. They then had us line up in a single file line, and escorted us to the front of the police station at around 10:00 p.m. In all, I was kept in tight handcuffs for more than 6 hours.

12. At the time of our detention our group was acting peaceful, had not done anything of an assaultive nature against the police. They would order us to move as a group in a certain direction, and when we did there was another line of officers blocking our way. Although we fully followed police orders to disperse through the alleyway, their actions prevented us from walking away.

13. During the entire time we were in custody we were not provided with any water or given access to a bathroom. I personally observed multiple protesters ask for their hand restraints to be adjusted because of the pain but the officers refused.

14. I want to continue going to the demonstrations that are still happening because I want to express support for police reforms and better treatment of my community members, but I am afraid of being arrested again or injured. I still strongly believe in the motives of the demonstrators to complain, denounce, and call for the end of arbitrary and violent police actions against people of color, and in particular, African-Americans.

15. I am also a class representative in this action. I understand that, if the Court grants plaintiffs' class certification motion, I would represent a large number of people who are part of this lawsuit. I understand that the lawsuit is seeking damages, as well as changes in policy. I understand that I would represent the interests of those persons who were present at Third and Fairfax on May 30, 2020, and who were kettled, detained, and/or arrested despite being peaceful protesters that did not present any threat of harm to the police officers or others.

16. As a class representative:

- i. I understand that I and other plaintiffs are claiming that the conduct of the City employees and agents was unlawful and that I am acting on behalf of many people besides myself whose rights were violated as the result of the foregoing law enforcement activity.
- ii. I also understand that I and other plaintiffs are claiming that the conduct of the City employees and agents was unlawful and that I am acting on behalf of many people besides myself whose rights were violated as the result of the foregoing law enforcement activity.
- iii. I understand that, as a class representative, it is my responsibility to represent the interests of the class as a whole, and not just my personal interests.
- iv. I understand that a class representative has claims which are typical of the members of the class or sub-class being represented. I understand that

“typical” means that my claims against the defendants are like the claims of the other class and/or sub-class members because each of us was injured as a result of a common policy, practice, or law implemented by the defendants.

- v. I understand that my responsibilities as a class representative continue until the Court decides that this case is no longer a class action or the case ends.
- vi. I understand that, through my attorneys, I have a duty and responsibility to let class members know about important developments in the case. I understand that my attorneys and the Court will let me know what those events are.
- vii. I understand that, if and when the Court requires notification to class members about significant events in the case, my attorneys will prepare the notices to class members and send them out. I understand that this includes notices to let class members know their rights and how they can participate in the case.
- viii. I understand that any resolution of this lawsuit must be accepted by the class as a whole.
- ix. I understand that as a class representative, I have an ongoing obligation to make reasonable efforts to provide my attorneys with the information they need to prosecute this case. This includes providing any documents I have related to this case, if required; to testify a deposition, hearing or trial, if necessary; to maintain current contact information and any other contact

information necessary for my attorneys to be able to reach me on short notice.

- x. I understand that, as a class representative, I am volunteering to represent many people with similar claims and damages. I believe that it is important for all people whose rights were violated as mine were on to benefit from the lawsuit. Based on what I have been told, proceeding with this lawsuit as a class action will save time, money, and effort and allow individuals with relatively small monetary claims to vindicate their rights.
- xi. I am not aware of any conflicts with any other members of the class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of June, 2020, in the County of Los Angeles, State of California.

A handwritten signature in black ink, appearing to read 'KH' with a stylized flourish.

KRYSTLE HARTSFIELD

EXHIBIT 7

DECLARATION OF MAIA KAZIN

I, MAIA KAZIN, declare:

1. I am a high school tutor living in Los Angeles, California. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On June 1, 2020, I participated in a peaceful demonstration on Spring St. near the intersection of 5th Street in downtown Los Angeles to protest the killing of George Floyd and other victims of police brutality.
3. At 6:30 p.m. officers from the Los Angeles Police Department moved in and blocked about 300 people from moving north or south on Spring Street. The police formed a blockade at both ends of Spring Street. Some people tried to leave through a parking lot on Spring, but the police quickly blocked their exit.
4. I was at the front of the protest. Prior to the police blockade of the protesters, there was no dispersal order. Nor did I hear any warning or advisal that we were in violation of a curfew. There was no instruction to leave the area or that we would be arrested if we did not leave.
5. The police arrested us by blockading all 300 individuals from both ends on the section of Spring Street where we had gathered. Then the officers handcuffed us with zip-ties and removed us one by one from the group. I did not receive the citation for a curfew violation until 15 minutes after I was handcuffed.
6. After were zip-tied, we were loaded onto buses. There were about 5-6 buses to transport the people who were arrested and about 48 people were on my bus. We were not told where we were being taken. I learned that we had

1 been taken from downtown Los Angeles to a parking lot near UCLA only
2 after we had arrived in the UCLA parking lot.

3 7. We sat on the bus in the parking lot from 7:30 p.m. until about 1:00 a.m.
4 with no access to food, water, or bathrooms. No one was given a mask.

5 8. A woman on the bus was in physical distress from a dislocated shoulder.
6 Someone in our group called 911. She had been on the bus for four hours
7 until she was finally taken off by an officer. A woman next to me was
8 panicking because she needed to take her blood thinner medication. She was
9 in great distress so someone in our group with a cell phone called 911. The
10 woman was taken off the bus shortly after—around 11:00 p.m.

11 9. I was handcuffed behind my back with plastic zip-ties from 6:30 p.m. until
12 1:00 a.m. The handcuffs were painful and I had minor tenderness on both
13 wrists for about 2-3 days.

14 10. While we were detained on the bus for over 5 ½ hours, we were given little
15 or no information about how long we would be detained or when we would
16 be allowed to leave the bus.

17 11. I was released at approximately 1:00 a.m. I asked an officer whether my
18 boyfriend would be violating curfew if he picked me up. I was informed that
19 it would be a curfew violation, but he should be fine. I got a ride home from
20 the friend of someone I met on the bus.
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23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed this 20th day of June 2020.

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28 MAIA KAZIN

EXHIBIT 8

DECLARATION OF ERIK J. LESSAC-CHENEN

I, Erik J. Lessac-Chenen, declare:

1. I am a plaintiff in this action. I am employed as an aerospace engineer. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On May 30th, 2020, I observed a peaceful demonstration originating in Pan Pacific Park to protest the killing of George Floyd and other victims of police brutality and racism. I drove to the Fairfax area with my girlfriend and two friends.
3. I arrived at the location at around 2:00 pm. I observed some protesters who were holding signs. The crowd was peaceful. People of all ages appeared to be at the protest. The first thing I saw upon arriving to the location was a group of First Nation people performing what I assume was a culturally significant dance. I, with my companions, observed the dancing for about ten minutes.
4. After watching the dance for some time, we decided to advance forward to see what the front of the crowd looked like. By the time I caught up with the main group, I observed that police officers had formed a scrimmage line on 3rd street at the 7944 address. At this point, it was around 2:30 pm.
5. I stayed a little further back and watched as my friend Weston Rowland moved to the front of the crowd to speak to some of the National Lawyers Guild volunteers. Around that time, I also observed police using excessive force to push the protestors back. To my knowledge, no unlawful assembly had been declared at this point.
6. As I watched, the police held this position for over an hour, transitioning between using batons to push back the crowd and firing some type of projectiles into the crowd. At around 4:20, I saw a car that looked like a red Dodge Charger drive through the crowd. Officers allowed opened the scrimmage line to allow the vehicle through while still firing projectiles into the crowd.

DECLARATION OF ERIK J. LESSAC-CHENEN

- 1 7. I remember hearing officers say to the protestors to leave the area but I did not hear an
2 announcement that an unlawful assembly had been declared. Also, I did not hear any
3 announcement of which direction to leave by. At this point, I observed that the
4 demonstrators were very agitated because of the tactics of the police.
- 5 8. As the police continued to push and shoot the group, protestors started to leave the area,
6 marching up Fairfax instead of taking the previous route down 3rd street.
- 7 9. When the march reached Beverly and Fairfax at around 4:45 p.m., we saw another line of
8 officers blocking our passage around the Chase bank on the north east corner of the
9 intersection. As protestors started to fill the intersection, I heard police officers yell at us
10 to get back. At this point, I observed several officers start using their batons in overhand
11 swings into the crowd. At one point, I observed an office use his baton in an overhead
12 strike at a woman standing near me. It appeared to me that the baton would strike her
13 skull. head. I was able stop the baton with my hand before the officer made contact with
14 the woman's head.
- 15 10. However, the force of the baton strike was so strong that it broke the skin on my hand
16 and my whole palm and thumb immediately started swelling to twice the normal size. I
17 had bleeding in the lower thumb area, which took the majority of the impact of the baton.
18 I continued to have pain in the area for nearly three weeks after the event. For the first
19 week I could not pick up objects with the injured hand without experiencing a great deal
20 of pain.
- 21 11. At approximately 5:00 p.m., I observed that the police had formed another line, blocking
22 entry onto Beverly Blvd. The protestors maintained a wide distance from officers of
23 approximately 20 feet. The majority of protestors had their hands up, facing the officers.
24 At this point, I observed officers fire rubber bullets into the crowd. The rounds were
25 not shot at the ground but directly at protestors upper body as protestors were chanting
26 "don't shoot" with their hands up. I observed rubber projectiles hit multiple protestors
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DECLARATION OF ERIK J. LESSAC-CHENEN

1 directly and ricochet through the crowd. I was struck with some type of projectile at this
2 time.

3 12. At this point, having been hit with a baton and multiple projectiles, my friends and I
4 decided to leave the protest to inspect our injuries and wait until the police stopped
5 attacking the demonstrators..

6 13. We left the protest and sat in a nearby business park. We sat in that same spot for
7 approximately one hour. We tried to get an Uber to pick us up so we could go home, but
8 no Uber would pick us up. I did not observe that buses were running in the area. We
9 then walked several miles back to where I had parked my car.

10 14. By 7:00 p.m., we had made our way to Beverly and Edinburg on our way to reach my
11 car. At this point, we saw a group of protestors facing another police line blocking our
12 route. The police appeared to be armed with projectile weapons. I observed at this point
13 that there was approximately 30 feet between officers and protestors. As I watched, I
14 saw a male officer, make a hand motion as he laughed and shot at protestors with rubber
15 bullet rounds. At one point after firing rubber bullets he asked "who else wants one?" I
16 was close enough to hear what he said.

17 15. Several other protestors and I saw this interaction and asked both that officer and the
18 officers around him to identify the unmarked unnamed officer. No officer was willing to
19 give the officer's name.

20 16. At around 7:08, I saw a woman was struck multiple times with rubber bullets. She fell
21 to the ground. My friend and I approached the woman to aid her. My friend was then
22 shot directly in the upper body with a projectile. My friend immediately took off his
23 overshirt to reveal a bright red bleeding wound the size of a golf ball. A good amount of
24 skin was hanging off the wound and he appeared to be in a great deal of pain.

25 17. At this point my friends and I decided that it was too risky to be in this area because of
26 the police shooting protestors. We started heading south on Fairfax.

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DECLARATION OF ERIK J. LESSAC-CHENEN

1 18. By around 7:20 we were near Fairfax and Third. I observed that a line of officers
2 were blocking the street even though at that location there were no protestors. We
3 attempted to cross the street but the officers would not let us cross the street. The police
4 kept telling us to go home but had blocked multiple routes to get to my car. . Eventually
5 we were able to get past that scrimmage line and return to my car.
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7 I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd
8 day of June 2020.

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11 DECLARATION OF ERIK J. LESSAC-CHENEN
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DECLARATION OF ERIK J. LESSAC-CHENEN

EXHIBIT 9

DECLARATION OF NELSON LOPEZ

I, NELSON LOPEZ, declare:

1. I am a maintenance repairman living in Los Angeles, California. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On May 29, 2020, I participated in a peaceful demonstration in front of Los Angeles City Hall at First and Spring Street in downtown Los Angeles organized by Black Lives Matter Los Angeles to protest the killing of George Floyd and other victims of police brutality and racism.
3. On the day of the protest I parked my car at about 7:30 p.m. on 9th Street near the 9th Street exit off the 110 freeway in downtown Los Angeles. I stood with some protesters who were peacefully holding signs. Some people had gotten up on the freeway but I did not join the protesters there. The police then used flash bang grenades on the protesters so the group started marching east on 9th Street toward City Hall.
4. After about an hour, I arrived at Spring and First Street outside City Hall. The crowd was very peaceful. People were handing out snacks and water and I saw little kids holding signs. However, the police had formed a rectangle of officers around the group and we were blocked in from all sides unable to exit the area. We were never given a dispersal order and there was no opportunity to leave. A helicopter flew over the crowd and it was very hard to hear. I did not hear a dispersal order or any other announcement coming from the helicopter.
5. The police surrounding the crowd said, "You need to take a seat. Everyone is going to be peacefully arrested." People in the crowd kept asking the

1 police what they meant by “peacefully arrested.” We waited about 40
2 minutes for an answer and then we were told we would be given a ticket that
3 was like a traffic citation and nothing would go on our record.

4 6. I sat down. While I was detained at City Hall, I got in touch with my mother
5 who is a registered nurse at California Hospital. She got off her 12-hour shift
6 and came to look for me. She found me and said, “Lets go!” However, she
7 also got trapped. She was arrested and detained with the people who were
8 surrounded by police at City Hall, even though she was coming from work
9 and came to take me home with her.

10 7. It took about two to three hours for everyone in the group at City Hall to be
11 handcuffed. Some homeless people were also swept up in the arrests. Some
12 folks were screaming about the tight handcuffs. Others were upset because
13 the police lied to them. We were initially told we would just be cited but
14 now we were being handcuffed and told we would need to be fingerprinted,
15 placed on a bus, and taken to a police station.

16 8. People were stuffed like sardines into the bus and most people did not have
17 masks. The police garage was just a few minutes from City Hall. However,
18 we sat on the bus for about 45 minutes waiting to get into the police garage.
19 Once I was taken into the garage, it seemed as though there were already
20 1,000 people inside being processed. More and more busloads of people
21 arrived.

22 9. My tight handcuffs were extremely uncomfortable. Later, I discovered that
23 they caused bruising. My right shoulder rotator cuff was sore for about a
24 week from the prolonged handcuffing. Then the pain went away. I asked a
25 police officer to loosen the handcuffs and he said they did not have enough
26 handcuffs to do this. Another officer to loosen by cuffs and he said they did
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1 not have the right tool. Everyone complained that their handcuffs were too
2 tight.

3 10. It took 2-3 hours to get my citation while I was in the police garage. I was
4 never photographed and fingerprinted. I was cited for a violation of LAMC
5 80.02 - failure to obey a lawful order of a police officer.

6 My mother was one of the first to be put on a bus with other women and
7 taken to the same police garage where I was processed. After I signed my
8 citation and was released, I found my mom. She was released around 1:00
9 a.m. and waited for me until I was released at 3:30 a.m. It took us about 40
10 minutes to walk to her car which was still in the California Hospital parking
11 lot where she left it.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed this ____ day of June 2020.
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NELSON LOPEZ
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7. It took two to three hours for everyone in the group at City Hall to be handcuffed. Some homeless people were also swept up in the arrests. Some folks were screaming about the tight handcuffs. Others were upset because the police lied to them. We were initially told we would just be cited, but now we were being handcuffed and told we would need to be fingerprinted, placed on a bus, and taken to a police station.
8. People were stuffed like sardines into the bus and most people did not have masks. The police garage was just a few minutes from City Hall. However, we sat on the bus for about 45 minutes waiting to get into the police garage. Once I was taken into the garage, it seemed as though there were already 1,000 people inside being processed. More and more busloads of people arrived.
9. My tight handcuffs were extremely uncomfortable. I asked a police officer to loosen the handcuffs and he said they did not have enough handcuffs to do this. I asked another officer to loosen my cuffs and he said they did not have the right tool. Everyone complained that their handcuffs were too tight. Later, I discovered that they caused bruising on my wrists. My right shoulder rotator cuff was sore for about a week from the prolonged handcuffing. Then the pain went away.
10. It took two to three hours to get my citation while I was in the police garage. I was never photographed and fingerprinted. I was cited for a violation of LAMC 80.02 - failure to obey a lawful order of a police officer.
11. My mother was one of the first to be put on a bus with other women and taken to the same police garage where I was processed. After I signed my citation and was released, I found my mom. She was released around 1:00 a.m. and waited for me until I was released at 3:30 a.m. It took us about 40 minutes to walk to her car which was still in the California Hospital parking lot where she left it.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of June 2020.


NELSON LOPEZ

EXHIBIT 10

DECLARATION OF JONATHAN MAYORCA

I, JONATHAN MAYORCA, hereby declare and say as follows:

1. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.

2. On May 30, 2020, I participated in a peaceful demonstration in the Fairfax area of Los Angeles to protest the death of George Floyd by police officers from the Minneapolis Police Department.

3. I am a journalist for an independent media company, and was out filming with my crew, including my sister Fiorella Mayorca, and our cameraman Eva Crowder. We were filming demonstrators on Beverly Boulevard, when officers from the Los Angeles Police Department began to form a line on the street near the CVS and push us back. I was able to move my car, but then I realized we were trapped by the officers, and they were kettling us toward an alley. I showed them my press badge which was clearly visible. They ignored me and continued pushing us toward the alley. We were surrounded by police officers and unable to exit despite our protests.

4. We were then ordered to sit down and stop filming. I was arrested first. They forcefully put me on the ground, during which time they broke my camera. Then they handcuffed me with plastic zip ties that were very tight and caused a lot of pain and discomfort.

5. Then we were forced up against a wall and frisked (my sister felt violated). They looked at my wallet and forced us in to a van, sitting all together with no regard for social distancing. Others in the same group were protestors who were arrested and received the same treatment as did I.

6. After thirty minutes we were driven to the Los Angeles police station in Van Nuys, California, a considerable distance from where we were and where my car was parked. At the station a police officer wrote out a citation for failing to obey

1 lawful orders, LAMC 80.02. I have a court date of June 24, 2020, in the Van Nuys
2 courthouse.

3 7. At the time of our arrest the group was acting peaceful, and we had not done
4 anything of an assaultive nature against the police. I did not hear any dispersal
5 orders from the police. They would order us to move as a group in a certain
6 direction, and when we did there was another line of officers blocking our way.
7 Their actions prevented us from walking to my car. We were never given the
8 option of leaving before being arrested.

9 8. During the entire time we were in custody we were not provided with any
10 water or given access to a bathroom. I asked them to please remove the zip ties
11 because of the pain but they refused. I was the first person arrested, and the last
12 person released, after approximately 2 hours and 15 minutes in zip cuffs.

13 9. The zip cuffs were very tight and they had difficulty removing them, having
14 to insert a pair of scissors between my skin and the zip ties to break or cut them.

15 10. During the event my crew and I filmed the actions of both the protesters and
16 the Los Angeles police officers, including live streaming the events on the internet.

17 11. I continue going to the demonstrations that are still happening because that
18 is my profession , but I am afraid of being arrested again or injured. I still strongly
19 believe in the motives of the demonstrators to complain, denounce, and call for the
20 end of arbitrary and violent police actions against people of color, and in particular,
21 African-Americans.

22 12. I am also a class representative in this action. I understand that, if the Court
23 grants plaintiffs' class certification motion, I would represent a large number of
24 people who are part of this lawsuit. I understand that the lawsuit is seeking
25 damages, as well as changes in policy. I understand that I would represent the
26 interests of those persons who were present at Beverly and Fairfax/La Cienega on
27 May 30, 2020, and who were kettled, detained, and/or arrested despite being
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1 peaceful protesters that did not present any threat of harm to the police officers or
2 others.

3 13. As a class representative:

4 i. I understand that I and other plaintiffs are claiming that the conduct of the
5 City employees and agents was unlawful and that I am acting on behalf of
6 many people besides myself whose rights were violated as the result of the
7 foregoing law enforcement activity.

8 ii. I also understand that I and other plaintiffs are claiming that the conduct of
9 the City employees and agents was unlawful and that I am acting on behalf
10 of many people besides myself whose rights were violated as the result of
11 the foregoing law enforcement activity.

12 iii. I understand that, as a class representative, it is my responsibility to
13 represent the interests of the class as a whole, and not just my personal
14 interests.

15 iv. I understand that a class representative has claims which are typical of the
16 members of the class or sub-class being represented. I understand that
17 “typical” means that my claims against the defendants are like the claims
18 of the other class and/or sub-class members because each of us was injured
19 as a result of a common policy, practice, or law implemented by the
20 defendants.

21 v. I understand that my responsibilities as a class representative continue until
22 the Court decides that this case is no longer a class action or the case ends.

23 vi. I understand that, through my attorneys, I have a duty and responsibility to
24 let class members know about important developments in the case. I
25 understand that my attorneys and the Court will let me know what those
26 events are.

27 vii. I understand that, if and when the Court requires notification to class
28 members about significant events in the case, my attorneys will prepare the

1 notices to class members and send them out. I understand that this includes
2 notices to let class members know their rights and how they can participate
3 in the case.

4 viii. I understand that any resolution of this lawsuit must be accepted by the
5 class as a whole.

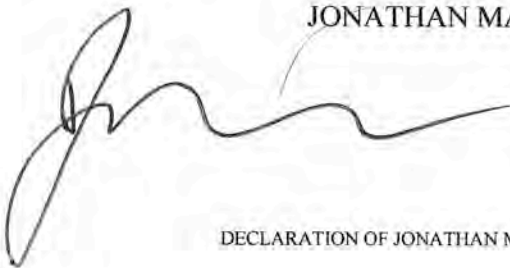
6 ix. I understand that as a class representative, I have an ongoing obligation to
7 make reasonable efforts to provide my attorneys with the information they
8 need to prosecute this case. This includes providing any documents I have
9 related to this case, if required; to testify a deposition, hearing or trial, if
10 necessary; to maintain current contact information and any other contact
11 information necessary for my attorneys to be able to reach me on short
12 notice.

13 x. I understand that, as a class representative, I am volunteering to represent
14 many people with similar claims and damages. I believe that it is important
15 for all people whose rights were violated as mine were on to benefit from
16 the lawsuit. Based on what I have been told, preceding with this lawsuit as
17 a class action will save time, money, and effort and allow individuals with
18 relatively small monetary claims to vindicate their rights.

19 xi. I am not aware of any conflicts with any other members of the class.
20

21
22 I declare under penalty of perjury that the foregoing is true and correct.
23 Executed this 19 day of June, 2020, in the County of Los Angeles, State of
24 California.
25

26 JONATHAN MAYORCA
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DECLARATION OF JONATHAN MAYORCA - 4

EXHIBIT 11

DECLARATION OF SHANNON LEE MOORE

I. SHANNON LEE MOORE, declare:

1. I am a plaintiff in the above-captioned action. I have personal knowledge of the facts set forth below and, if called to testify, could and would testify to these facts based on my personal knowledge.

2. On the evening of June 1, 2020, I participated in a peaceful demonstration in the Brentwood area of Los Angeles to protest the killing of George Floyd on May 25, 2020 by police officers in Minneapolis. The demonstration ended when LAPD officers on site announced that a curfew was then in effect that night.

3. The next day, June 2, 2020, I went to the Hollywood area, where I understood some protests were occurring. I went with a friend who was filming the demonstration. I arrived near the intersection of Hollywood and Vine at approximately 2:50 p.m. When I first arrived, I observed that there were groups of protestors assembled on the sidewalks around the intersection with about 20 or so on the northwest corner of Hollywood Boulevard and another smaller group of approximately 10 people across the intersection on the sidewalk on Vine where I was standing. There were also Los Angeles Police Department officers in segment of the intersection. I could see that they were using batons to push the small group where I was standing back. Some of the officers had rifles painted green, which I understand marks them as firing impact projectiles of some type.

4. I stood off to the side, away from where the police were jabbing protestors with batons. Within barely five minutes of my arrival, I observed a tall man in a red shirt come up and stand near me and throw a water bottle at the police. Almost immediately, I saw one of the officers with a less-lethal weapon point at me and aim directly at me. I was able to turn my head so that the munitions hit me in the back of my head, behind my left ear. Had I not turned my head, I would have been hit directly in the face and possibly in an eye.

EXHIBIT 12

DECLARATION OF NADIA KHAN

I, NADIA KHAN, declare:

1. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On Saturday, May 30, 2020, at about 11 a.m. I arrived at Pan Pacific Park in Los Angeles to attend a Black Lives Matter protest against police brutality and the killing of George Floyd.
3. About noon the protest left the park and began a march. I joined the march and when we got near the intersection of 3rd and Fairfax I saw police in riot gear. They shot projectiles at the march but I was not hit. I then continued marching north up Fairfax to Beverly Blvd., where there was a large group of young people. I marched with them to the Beverly Center and then marched back on Beverly Blvd. towards Fairfax.
4. When we got near Beverly and Fairfax the police started to tear gas us. The tear gas made my eyes burn and tear up and the gas got into my lungs, making me cough. The police were also shooting small pellets at us. I was hit in the legs. It hurt when the pellets hit me but the police were shooting from a distance and I was wearing jeans, so they did not seriously injure me.
5. I then marched north on Fairfax towards Melrose. The police kettled me there at about 7:45 p.m. with about 100 other people. The police handcuffed me behind my back with zip ties. They put the zip ties on too tightly and my wrists were in pain. I asked the officers to loosen the zip ties but they ignored me. They put us on two

1 They put us on two crowded buses. I was wearing both a mask and goggles to protect
2 myself and others from COVID but most of the officers were not wearing masks.

3 6. We were taken to an LAPD station on Venice Blvd. where I was given a ticket. The
4 ticket was for an infraction, 80.02 of the Los Angeles Municipal Code. I was finally
5 released about midnight. My wrists were sore and painful to move that night and
6 throughout the following day.

7
8 7. I want to continue engaging in protests against police misconduct but I'm concerned
9 that the police will injure and detain me if I protest again in the future.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed June 19, 2020, at Los Angeles, California.

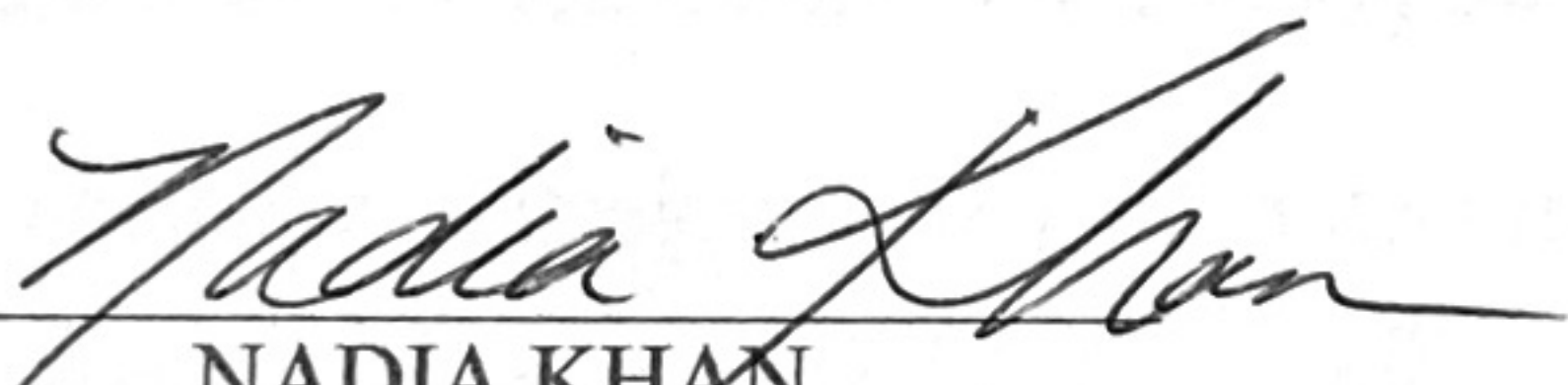
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13 
14 NADIA KHAN

EXHIBIT 13

DECLARATION OF ABIGAIL RODAS

I, ABIGAIL RODAS, hereby declare and say as follows:

1. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. I am a 22 year-old Latina student at National Holistic Institute. I have had to interrupt my studies because of injuries described herein.
3. On May 30, 2020, I participated in a peaceful demonstration in the Fairfax area of Los Angeles to protest the murder of George Floyd by police officers from the Minneapolis Police Department.
4. My friend Isaiah Salgado and I were walking on Beverly Boulevard near La Cienega Boulevard as part of a group that was protesting, when officers from the Los Angeles Police Department began to form a line and push us back. We decided to leave and began walking toward where I had parked my car when suddenly, an officer began shooting rubber bullets at us.
5. I was struck in the face by a rubber bullet, and momentarily lost consciousness. I fell to the ground, and when I came to, a girl was helping me by putting gauze in my mouth to stop the bleeding.
6. I was in a lot of pain, but the people around me helped me to my feet and we tried to go someplace safe. The police were still firing rubber bullets at us.
7. Somebody transported me to Cedar Sinai Hospital in a private car, which was nearby. When I got there, I was unable to talk. I was treated in the emergency room and admitted.
8. At the time of the shooting the group was acting peaceful, and we had not done anything of an assaultive nature against the police. I did not hear any dispersal order from the police. Their actions prevented us from walking to my car and leaving.

1 9. I suffered a severe fracture to my right mandible, which required surgery.
2 They admitted me to the hospital and conducted the surgery the next day in the
3 afternoon. They put stitches on both the inside and outside of my mouth to close
4 the lacerations, and they had to put a steel plate in my jaw to repair the fractured
5 jawbone. I was discharged from the hospital on Monday afternoon. I have been in
6 convalescence at home since my release. I was unable to talk for about ten (10)
7 days. For one week I was only able to drink liquids, and am still on a soft food
8 diet. I have screws in my gums and rubber bands that help immobilize my jaw and
9 prevent too much movement. I am still undergoing follow-up visits with the
10 doctors. I am waiting to hear if they will be removing some of the screws.

11 10. I want to continue going to the demonstrations that are still happening, but I
12 am afraid of being injured again. I still strongly believe in the motives of the
13 demonstrators to complain, denounce, and call for the end of arbitrary and violent
14 police actions against people of color, and in particular, African-Americans.

15 11. I am also one of the class representatives in this case. I understand that, if
16 the Court grants plaintiffs' class certification motion, I would represent a large
17 number of people who are part of this lawsuit. I understand that the lawsuit is
18 seeking damages, as well as changes in policy. I understand that I would represent
19 the interests of those persons who were present at Beverly and Fairfax/la Cienega
20 on May 30, 2020, and who were subjected to unnecessary and excessive force and
21 shot with impact projectiles or otherwise injured despite being peaceful protesters
22 that did not present any threat of harm to the police officers or others.

23 12. As a class representative:

- 24 i. I understand that I and other plaintiffs are claiming that the conduct of the
25 City employees and agents was unlawful and that I am acting on behalf of
26 many people besides myself whose rights were violated as the result of the
27 foregoing law enforcement activity.

28

- 1 ii. I also understand that I and other plaintiffs are claiming that the conduct of
2 the City employees and agents was unlawful and that I am acting on behalf
3 of many people besides myself whose rights were violated as the result of
4 the foregoing law enforcement activity.
- 5 iii. I understand that, as a class representative, it is my responsibility to
6 represent the interests of the class as a whole, and not just my personal
7 interests.
- 8 iv. I understand that a class representative has claims which are typical of the
9 members of the class or sub-class being represented. I understand that
10 “typical” means that my claims against the defendants are like the claims
11 of the other class and/or sub-class members because each of us was injured
12 as a result of a common policy, practice, or law implemented by the
13 defendants.
- 14 v. I understand that my responsibilities as a class representative continue until
15 the Court decides that this case is no longer a class action or the case ends.
- 16 vi. I understand that, through my attorneys, I have a duty and responsibility to
17 let class members know about important developments in the case. I
18 understand that my attorneys and the Court will let me know what those
19 events are.
- 20 vii. I understand that, if and when the Court requires notification to class
21 members about significant events in the case, my attorneys will prepare the
22 notices to class members and send them out. I understand that this includes
23 notices to let class members know their rights and how they can participate
24 in the case.
- 25 viii. I understand that any resolution of this lawsuit must be accepted by the
26 class as a whole.
- 27 ix. I understand that as a class representative, I have an ongoing obligation to
28 make reasonable efforts to provide my attorneys with the information they

1 need to prosecute this case. This includes providing any documents I have
2 related to this case, if required; to testify a deposition, hearing or trial, if
3 necessary; to maintain current contact information and any other contact
4 information necessary for my attorneys to be able to reach me on short
5 notice.

- 6 x. I understand that, as a class representative, I am volunteering to represent
7 many people with similar claims and damages. I believe that it is important
8 for all people whose rights were violated as mine were to benefit from the
9 lawsuit. Based on what I have been told, proceeding with this lawsuit as a
10 class action will save time, money, and effort and allow individuals with
11 relatively small monetary claims to vindicate their rights.
- 12 xi. I am not aware of any conflicts with any other members of the class.
- 13
14

15 I declare under penalty of perjury that the foregoing is true and correct.
16 Executed this 19 day of June, 2020, in the County of Los Angeles, State of
17 California.

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19 ABIGAIL RODAS

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EXHIBIT 14



DECLARATION OF STEVEN CHRISTIAN ROE

I, STEVEN CHRISTIAN ROE, hereby declare and say as follows:

1. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.

2. On May 29, 2020, I participated in a peaceful demonstration in downtown Los Angeles, at or about the intersection of Temple and Spring Streets, near City Hall, to protest the murder of George Floyd by police officers from the Minneapolis Police Department. I was there with my fiancé, Renee Schwartz, and roommate Alejandro Aguilar.

3. Around 9:00 that night the police formed a line and began pushing us toward City Hall. There were approximately 100-200 people. The crowd moved in compliance with the police orders, but each time we did we were met by other lines of police officers that impeded our progress. It was obvious they were herding us into a confined space as a group. Many of us began to complain, asking them to allow us to leave. They refused. We asked if we were under arrest or being detained. They wouldn't tell us. We were completely surrounded by police officers and unable to exit despite our protests. A few people ran trying to get away. Some were successful, others were not.

4. At one point as the crowd was being vocal, the police line came closer to us. I started pulling people back to avoid direct contact. I was aware that someone behind me threw a water bottle that went beyond the officers. The officers began to advance more aggressively and as I continued pulling people back, one of the officers took aim at me and shot me in the stomach with a rubber bullet. At the time I clearly did not present a threat to him because I was pulling people back and was walking backward facing the officers when struck. The rubber bullet hit me with such force that it broke the skin and caused a deep bruise. It was very painful. I still have a welt under the skin almost two weeks later.

1 5. Finally, about 9:45 p.m. they made an announcement over loudspeakers
2 ordering us to sit down to be peacefully arrested. Up until that point I never heard
3 an order to disperse, and all our requests to be permitted to leave were ignored.
4 We continually asked for explanations why we were being arrested and not be
5 allowed to leave. They refused to give us any answers. (I later learned that at
6 09:35 p.m. the LAPD put out a statement on Twitter declaring it an unlawful
7 assembly. I do not follow the LAPD on Twitter, and besides, was not checking the
8 internet while attending the demonstration on the street).

9 6. At first, they asked for volunteers to be arrested. A few brave people stood
10 up and submitted, only to be treated roughly. We recorded someone being pinned
11 to the ground despite they're being very cooperative. They handcuffed me with
12 plastic zip ties that were very tight and caused a lot of pain and discomfort.

13 7. We were then forced to wait for buses to be transported to a jail facility. We
14 were loaded onto buses; most people being held in confined spaces with no regard
15 for the coronavirus. Most of the officers were not wearing masks. We were driven
16 to a building nearby, only a few blocks away. We could've walked there faster
17 than it took to load us on the buses and drive us. During the entire time we were in
18 custody we were not provided with any water or given access to a bathroom. I
19 asked them to please remove the zip ties because of the pain but they refused. I
20 was the first person arrested, and the last person released, after approximately 2
21 hours and 15 minutes in zip cuffs.

22 8. The zip cuffs were very tight and were very painful. After a while, I
23 couldn't feel my fingers. No matter how many times I asked them to loosen them
24 or remove them, they ignored me and refused to do so. Many other people also
25 complained of how tight the zip ties were.

26 9. When we got to the jail facility one individual was screaming in pain and
27 continually asking for medical attention. Apparently, the zip ties had cut his
28

1 fingers. They ignored him for over half-an-hour and eventually released him
2 without providing him with any medical attention or treatment.

3 10. We were finally released about 2:15 p.m. I recorded on video many of the
4 events, and took pictures of my injuries.

5 11. I continue going to the demonstrations that are still happening although I am
6 afraid of being arrested again or injured. My friends and I have written signs on
7 Styrofoam boogie boards to which we attached handles, so we can hold them as
8 shields if shot at again. In fact, we made three of them so if necessary, we can put
9 them together and defend several people behind them. I still strongly believe in the
10 motives of the demonstrators to complain, denounce, and call for the end of
11 arbitrary and violent police actions against people of color, and in particular,
12 African-Americans.

13 12. I am also a class representative in this action. I understand that, if the Court
14 grants plaintiffs' class certification motion, I would represent a large number of
15 people who are part of this lawsuit. I understand that the lawsuit is seeking
16 damages, as well as changes in policy. I understand that I would represent the
17 interests of those persons who were present at Spring and Temple on May 29,
18 2020, and who were kettled, detained, and/or arrested despite being peaceful
19 protesters that did not present any threat of harm to the police officers or others.

20 13. As a class representative:

- 21 i. I understand that I and other plaintiffs are claiming that the conduct of the
22 City employees and agents was unlawful and that I am acting on behalf of
23 many people besides myself whose rights were violated as the result of the
24 foregoing law enforcement activity.
- 25 ii. I also understand that I and other plaintiffs are claiming that the conduct of
26 the City employees and agents was unlawful and that I am acting on behalf
27 of many people besides myself whose rights were violated as the result of
28 the foregoing law enforcement activity.

- 1 iii. I understand that, as a class representative, it is my responsibility to
2 represent the interests of the class as a whole, and not just my personal
3 interests.
- 4 iv. I understand that a class representative has claims which are typical of the
5 members of the class or sub-class being represented. I understand that
6 “typical” means that my claims against the defendants are like the claims
7 of the other class and/or sub-class members because each of us was injured
8 as a result of a common policy, practice, or law implemented by the
9 defendants.
- 10 v. I understand that my responsibilities as a class representative continue until
11 the Court decides that this case is no longer a class action or the case ends.
- 12 vi. I understand that, through my attorneys, I have a duty and responsibility to
13 let class members know about important developments in the case. I
14 understand that my attorneys and the Court will let me know what those
15 events are.
- 16 vii. I understand that, if and when the Court requires notification to class
17 members about significant events in the case, my attorneys will prepare the
18 notices to class members and send them out. I understand that this includes
19 notices to let class members know their rights and how they can participate
20 in the case.
- 21 viii. I understand that any resolution of this lawsuit must be accepted by the
22 class as a whole.
- 23 ix. I understand that as a class representative, I have an ongoing obligation to
24 make reasonable efforts to provide my attorneys with the information they
25 need to prosecute this case. This includes providing any documents I have
26 related to this case, if required; to testify a deposition, hearing or trial, if
27 necessary; to maintain current contact information and any other contact
28

1 information necessary for my attorneys to be able to reach me on short
2 notice.

- 3 x. I understand that, as a class representative, I am volunteering to represent
4 many people with similar claims and damages. I believe that it is important
5 for all people whose rights were violated as mine were on to benefit from
6 the lawsuit. Based on what I have been told, preceding with this lawsuit as
7 a class action will save time, money, and effort and allow individuals with
8 relatively small monetary claims to vindicate their rights.
- 9 xi. I am not aware of any conflicts with any other members of the class.
- 10
- 11

12 I declare under penalty of perjury that the foregoing is true and correct.
13 Executed this 19 day of June, 2020, in the County of Los Angeles, State of
14 California.

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16 STEVEN CHRISTIAN ROE

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EXHIBIT 15

DECLARATION OF LINUS SHENTU

I, LINUS SHENTU, declare:

1. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. I am a long-time member of CANGRESS (a.k.a. LA-CAN), a grassroots organization that organizes with unhoused people in Skid-Row.
3. On June 2, 2020, I participated in a peaceful demonstration in Hollywood. The demonstration began near Sunset Boulevard and Vine Street. We marched east on Sunset, then turned south. There was a car caravan moving slowly alongside the protestors on foot.
4. As we marched down North Van Ness Avenue, between Melrose Avenue and Santa Monica Boulevard, I saw police blocking side streets to surround the protestors. Then police began to tackle and arrest people. They also dragged people out of their cars. Protestors started running.
5. My partner and I looked for my partner's sister who was in her car. We found her and got into the backseat. We were trying to leave the area and go home, but because police had blocked off side streets, we were unable to leave. We followed other cars to a parking lot of a nearby apartment building at 429 Van Ness Avenue.
6. Police came into the parking lot and began pulling people out of their cars to arrest them. The officers ordered me, my partner, and her sister out of the car. One officer opened the rear passenger door, where my partner was seated, and yanked her out by her arm. I voluntarily exited the rear passenger door after her.
7. Police put everyone they had pulled out of the cars into zip-tie plastic handcuffs and lined us up along the side of the building. There were approximately 30-40 people arrested there at the apartment building. We were held for about an hour while police officers filled out paperwork.
8. After about an hour, buses with Sheriff Department written on them arrived. Police ordered everyone in handcuffs to get on the bus. We were driven to a makeshift processing center in Van Nuys at Roscoe and Woodman. We got off the bus one-by-one,

SHENTU DECLARATION 1

1 then police searched us and made us sign our citations. The process took about 3 or 4
2 hours, before we were finally released around midnight. My partner's sister called a
3 friend who was able to pick us up.

4 9. During the entire time we were detained, my hands were handcuffed behind my back. My
5 partner, her sister, and I each experienced numbness, bruising, and soreness from the
6 handcuffs. My partner's arm was sore from being pulled out of the car.

7 10. Based on my experience, I know that if I engage in lawful protest activity, there is a risk
8 of being arrested again or injured by the aggressive and violent behavior of the Los
9 Angeles Police Department.

10 11. I am also a class representative in this action. I understand that, if the Court grants
11 plaintiffs' class certification motion, I would represent a large number of people who are
12 part of this lawsuit. I understand that the lawsuit is seeking damages, as well as changes
13 in policy. I understand that I would represent the interests of those persons who were
14 present at Hollywood on June 2, 2020, and who were kettled, detained, and/or arrested
15 despite being peaceful protesters that did not present any threat of harm to the police
16 officers or others.

17 12. As a class representative:

18 i. I understand that I and other plaintiffs are claiming that the conduct of the City
19 employees and agents was unlawful and that I am acting on behalf of many people
20 besides myself whose rights were violated as the result of the foregoing law
21 enforcement activity.

22 ii. I understand that, as a class representative, it is my responsibility to represent the
23 interests of the class as a whole, and not just my personal interests.

24 iii. I understand that a class representative has claims which are typical of the members of
25 the class or sub-class being represented. I understand that "typical" means that my
26 claims against the defendants are like the claims of the other class and/or sub-class
27 members because each of us was injured as a result of a common policy, practice, or
28 law implemented by the defendants.

- 1 iv. I understand that my responsibilities as a class representative continue until the Court
2 decides that this case is no longer a class action or the case ends.
- 3 v. I understand that, through my attorneys, I have a duty and responsibility to let class
4 members know about important developments in the case. I understand that my
5 attorneys and the Court will let me know what those events are.
- 6 vi. I understand that, if and when the Court requires notification to class members about
7 significant events in the case, my attorneys will prepare the notices to class members
8 and send them out. I understand that this includes notices to let class members know
9 their rights and how they can participate in the case.
- 10 vii. I understand that any resolution of this lawsuit must be accepted by the class as a
11 whole.
- 12 viii. I understand that as a class representative, I have an ongoing obligation to make
13 reasonable efforts to provide my attorneys with the information they need to prosecute
14 this case. This includes providing any documents I have related to this case, if required;
15 to testify a deposition, hearing or trial, if necessary; to maintain current contact
16 information and any other contact information necessary for my attorneys to be able to
17 reach me on short notice.
- 18 ix. I understand that, as a class representative, I am volunteering to represent many people
19 with similar claims and damages. I believe that it is important for all people whose
20 rights were violated as mine were on to benefit from the lawsuit. Based on what I have
21 been told, proceeding with this lawsuit as a class action will save time, money, and effort
22 and allow individuals with relatively small monetary claims to vindicate their rights.
- 23 x. I am not aware of any conflicts with any other members of the class.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed this
25 19th day of June, 2020.

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LINUS SHENTU

EXHIBIT 16

DECLARATION OF ALEXANDER STAMM

I, ALEXANDER STAMM, declare:

1. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On June 1, 2020, I participated in a peaceful demonstration in Hollywood to protest the killing of George Floyd and other victims of police brutality and racism. I joined the demonstration at Vine Street and Sunset Boulevard at around 4:00 p.m. My husband joined me in the march about an hour and a half later.
3. While we were marching, we saw the police use barricades to divert groups of protestors away from the larger crowd and down side streets. Then, the police would block the exit and trap the protestors in order to arrest them as a group.
4. While I never saw the police throw tear gas cannisters, I smelled chemical irritants in the air that suggested they had recently been used nearby.
5. At around 7:30 p.m., we saw police shoot rubber bullets into the crowd of protestors even though the group was peaceful and not throwing anything at the police. When we saw this, we were terrified and ran away. I saw someone who had just been hit with a rubber bullet in the thigh and he showed me the bloody welt on his leg.
6. At around 8:00 p.m., my husband and I decided to go home as the march had begun to disperse. We wanted to walk down Wilcox Avenue towards our apartment, but police had blocked that route, so we took the next street, Schrader Boulevard, instead.
7. As we walked down Schrader, between Selma Avenue and Sunset Boulevard, I saw police block the streets at either end of the block and surround our group. We were only three blocks from my home, but my husband and I were unable to leave.
8. Police ordered the group of about 200 to 300 people to get on their knees. They told us to put our hands behind our backs and then handcuffed us using plastic zip-ties.
9. We saw a member of the press show the police their press credentials, but the police refused to let him leave and he was arrested along with the rest of the group.

10. I did not hear the police give a dispersal order before arresting us.
11. They loaded me and my husband onto a Sheriff's Department bus. We were driven around the area for about an hour and a half as the police brought more people in handcuffs onto the bus.
12. There were about 34 people packed onto the bus. We were seated two to a bench, without any ability to social distance. People who were handcuffed could not lift their face masks that had fallen off of their face. The majority of the police officers I saw were not wearing any face masks.
13. Once the bus was full, we drove for about 45 minutes before arriving at a stadium parking lot near UCLA. We sat on the bus for another 2 hours before the police processed our citations.
14. Police took us off the bus two at a time and lined us up to process our citations. None of the police officers processing us were wearing face masks. Finally, at around 1 a.m., police cut off my plastic cuffs told me I was free to leave.
15. In order to get home to our apartment in Hollywood, my husband and I had to take two buses, then walk for about 4 miles to our apartment. We finally got home at 2:30 a.m.
16. From the time of my arrest at 8:30 p.m. until they were cut off at around 1 a.m., I was kept in zip-tie handcuffs with my hands behind my back. They were painfully tight and caused bruising on my wrists.
17. Based on my experience, I know that if I engage in lawful protest activity in the future, there is a risk of being arrested again or injured by the Los Angeles Police Department. I know that protests are crucial if we are going to hold the police and elected officials accountable for the systemic oppression of Black people. For that reason, I intend to continue attending public demonstrations, even as I fear for the physical safety of myself and other protestors.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of June, 2020.

STAMM DECLARATION 2



ALEXANDER STAMM

EXHIBIT 17

DECLARATION OF JEFFREY TROTTER

I, JEFFREY TROTTER, declare:

1. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.

2. I am a 51-year old African American man and a resident of Skid Row. I live at the Rosslyn Hotel, located on the corner of 5th and Main streets in Downtown Los Angeles.

3. On Sunday, May 31, 2020, at about 5 p.m. I walked from the Rosslyn to Rite Aid, a store and pharmacy located a few blocks away at 5th and Broadway.

4. The Rite Aid was closed so I started walking back home. When I got to 5th and Spring streets I saw a line of LAPD officers in riot gear. A white male officer stepped out of the line and approached me and asked where I was going. I answered that I was walking home from the Rite Aid.

5. Without any further discussion, he took a few steps back and started shooting me with hard rubber or foam projectiles at close range. He was just a few feet from me when he shot me four times, once in the chest, twice in the stomach, and once on my left hand.

6. The projectile that hit my chest bore into me, tearing off skin in the shape of the projectile. The one that hit my hand tore off a chunk of skin about an inch long and half an inch across. In the photograph of my injuries, this injury shows up on my left hand as a lighter area of skin. The photograph of my injuries fairly and accurately represents my injuries from May 31, 2020.

7. When he shot me, the impact of the projectiles caused me to fall first to my knees and

1 then all the way onto the ground, landing on my side. As I laid on the ground, I saw the officer
2 that shot me go back and join the other officers who watched him shoot me. They left me lying
3 on the ground and no officer tried to help me.

4 8. When I was finally able to get up, I walked back to the Rosslyn. I sat down in the
5 lobby and a friend called 911 for me. About 45 minutes later an ambulance came and treated me
6 on-site. They examined me, put sticky things on my chest which I believe they used to check my
7 heart, and provided me with an ice pack.

9 9. I was in a lot of pain. My stomach, chest and hand were swollen and bruised. That
10 night I had problems sleeping. I felt scared and anxious. I was in disbelief about what had just
11 happened. I have had interactions with law enforcement before but I've never had such a
12 negative experience.

14 10. Over two weeks later my chest, stomach, and hand are still swollen and sore. My
15 hand is still so swollen that it is difficult to make a fist. I still have bruising on my stomach, the
16 skin torn off my chest and hand are still healing.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed June 17, 2020, at Los Angeles, California.

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22 JEFFREY TROTTER
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EXHIBIT 18

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DECLARATION OF PETE WHITE

I, PETE WHITE, declare:

1. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to such facts if called as a witness. I am providing this declaration as a representative of the organizational plaintiff CANGRESS, dba Los Angeles Community Action Network ("LA CAN").

2. LA CAN is a grassroots non-profit organization that has been active in the Skid Row neighborhood of Los Angeles for almost two decades. More than 800 low-income residents of Skid Row are involved with LA CAN, many of whom are unsheltered each night. The primary purpose of the organization is to organize and empower community residents to work collectively to address systemic poverty and oppression in the community. One issue in recent years involved the police killing of Brother Africa, a homeless man living in a tent on Skid Row. Since its founding in 1999, LA CAN has been the only member-driven organization in Skid Row whose goal is to protect the rights and prevent the further disenfranchisement of homeless and poor people in Los Angeles.

3. LA CAN's members and associates have been arrested and/or subjected to the use of less-lethal weapons and other tactics aimed at shutting down public spaces from about May 29 to June 3, 2020. Individuals such as Plaintiffs SHENTU, TROTTER, and HINKSTON are associated with the organization as members and/or supporters.

4. LA CAN has expended personnel resources in trying to protect at-risk individuals from the City's illegal practices as well as assisting Skid Row residents who were physically injured by police action. In responding to this police action, LA CAN has had to shift resources away from protecting its members from COVID-19 and its focus on ending homelessness.

5. I and members of LA CAN often engage in public expressive activity and protest issues of homelessness, police violence, and the City's utter failure to correct these injustices. I am concerned that recent police violence against demonstrators will deter our members from engaging in such protected activity in the future.

1 I declare under penalty of perjury that the foregoing is true and correct and was executed on
2 June 23, 2020, at Los Angeles, California.

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5 By: 

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EXHIBIT 19

DECLARATION OF DEVON YOUNG

I, DEVON YOUNG, declare:

1. I am a mental health therapist living in Los Angeles, California. I am a named plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.
2. On June 2, 2020, I participated in a peaceful demonstration outside Mayor Eric Garcetti's house on the corner of South Irving Blvd and 6th Street in Windsor Square. The protest was organized by Black Lives Matter Los Angeles to protest the killings of George Floyd, Breonna Taylor, Ahmaud Arbery, and the countless other victims of police brutality and racism.
3. I arrived at the protest at approximately 5:00 p.m. and remained in the area near the Mayor's house with the protesters until about 8:00 p.m. The group I was with then began marching away from the Mayor's home.
4. While we were marching, we were surrounded and kettled by LAPD officers. No one was able to exit the group of about 100 people. I heard some protesters shout, "We are unarmed. Please don't hurt us." The officers continued to push us aggressively and silently toward Crenshaw and 8th Street. Some of the protesters yelled, "We want to leave. Let us go home!" The officers ignored them.
5. Finally, at around 8:45 p.m., near the intersection of Crenshaw and 8th Street, the officers announced that we were all under arrest. There was no disbursal order. The officers did not inform us that they were going to arrest us for a curfew violation before the arrest took place.
6. A man who seemed mentally unstable and possibly unhoused was swept up into our group by the police during the kettling. He appeared to be having a panic

1 attack. I tried to explain to the police that he was not part of the protest and to
2 please let him leave. He was extremely distressed and one of the protesters
3 asked the police to get him medical attention. They refused and he was
4 handcuffed.

5 7. One by one we were handcuffed with our hands behind our backs using plastic
6 zip-ties. Because I was at the front of the march, I was one of the last to be
7 handcuffed at about 9:45 p.m. The officers separated our group into two lines –
8 one for men and one for women.

9 8. While we remained in the two lines, the officers performed pat down searches
10 that were intrusive and uncomfortable for many of the women. We were forced
11 to stand close to each other with no social distancing. This also occurred when
12 we were kettled by the police and unable to exit the march.

13 9. During the pat down searches, I heard a lot of commotion about a transgender
14 woman being ripped away from her female partner because she did not have
15 female sex organs. I asked an officer what was happening to her and he replied
16 that she was being placed in a holding area labeled “other” so she could be
17 searched separately for her own safety. She and her partner were very
18 frightened and upset because they were separated.

19 10. While I was handcuffed, my skirt was raised up such that my underwear was
20 exposed to the group and I had no ability to pull it down because I was
21 handcuffed. I asked the officers if I could please pull my skirt down. They
22 refused to let me do so. Finally, after I walked through the group with my
23 underwear completely exposed, I was allowed to adjust my clothing. I was very
24 uncomfortable and humiliated.

25 11. At approximately 10:45 p.m. we were loaded onto a bus. The officers would
26 not tell us where we were being taken. We were not offered food, water,
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1 bathroom breaks, or the ability to change tampons even though some of us
2 needed to do this. I was very thirsty and needed to use the restroom urgently.

3 The woman next to me was getting nauseated and sick because the police would
4 not allow her to change her tampon.

5 12. We were forced to sit closely together on the bus. Some people had masks
6 that had fallen down off their faces and the police would not allow them to
7 retrieve or readjust them. My handcuffs were very tight and uncomfortable. I
8 sustained bruises and marks on my left wrist from the tight handcuffs. Others
9 also complained of tight and extremely uncomfortable handcuffs.

10 13. Finally, at 1:00 a.m. we arrived at a parking lot in Van Nuys and were taken off
11 the bus. We had been held on the bus for over two hours and, at one point, the
12 bus stopped and held us at an unknown location for approximately 30 minutes
13 before driving on to Van Nuys.

14 14. We were booked and processed in a Van Nuys parking lot. Many people of
15 color were fingerprinted while my fingerprints and the fingerprints of some
16 other white protesters were not taken.

17 15. We were released in the middle of the night at 1:30 p.m. with no ability to call
18 for a ride or instruction on how to get home safely. A police officer told us,
19 "You better go home otherwise you are going to get re-arrested and you are
20 going to need to pee and shit and you won't be able to."

21 16. Thankfully, some arrestees shared their cell phones with others and there was a
22 volunteer group offering rides home.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed this 19 day of June 2020.

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DEVON YOUNG

DECLARATION 1

EXHIBIT 20

DECLARATION OF ORLANDO HINKSTON

I, ORLANDO HINKSTON, declare:

1. I am a plaintiff in this action. This declaration is based on facts of which I have personal knowledge. If called to testify to these facts, I could and would do so competently.

2. I am a 50-year old African American man and a resident of Skid Row. I am disabled and use a wheelchair for mobility. I am currently homeless. I usually sleep in my wheelchair on the sidewalk near the Rosslyn Hotel, located on the corner of 5th and Main streets in Downtown Los Angeles.

3. On Sunday, May 31, 2020, in the evening after dark I was in my wheelchair on 5th Street in front of the Rosslyn.

4. I saw a crowd of demonstrators coming up 5th Street from the direction of Los Angeles Street. They passed me but when they got up near Spring Street they turned and started running back in my direction. I could hear loud "booms" as the police were shooting at the crowd with hard foam or rubber projectiles. I turned and tried to get away in my wheelchair but could not move quickly enough. I was scared I would be trampled by the crowd. As I was trying to get out of the way I was shot in the back with a projectile by the police. It hit me near the middle of my left shoulder blade. It hit me so hard I almost fell out of my wheelchair. Had I not fallen against the glass windows in front of the Rosslyn I would have been knocked to the ground.

5. I was in a lot of pain that night. The next day I was still in pain and could not use my arm. Over two weeks later, I still have a bruise where I was shot. I still have pain in my arm and shoulder and limited mobility. I have not recovered full use of my arm. The photo of my injuries

1 fairly and accurately represents my injuries from May 31, 2020.

2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed June 7, 2020, at Los Angeles, California.

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6 ORLANDO HINKSTON
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Declaration of Orlando Hinkston