

Exhibit E

North Baton Rouge Matters; Black Youth Power 100 N.A.
Orleans; New Orleans Workers' Center for Racial Justice;
American Civil Liberties Union of Louisiana; Louisiana Chapter
of the National Lawyers' Guild.

Plaintiffs.

City of Baton Rouge; Baton Rouge Police Department; Carl
Dabadie, Jr., in his official capacity as Chief of the Baton Rouge
Police Department; Louisiana State Police; Louisiana
Department of Public Safety; Col. Michael Edmonson, in his
official capacity as Superintendent of the Louisiana State Police;
East Baton Rouge Sheriff's Department; Sid J. Gaudreault III, in
his official capacity as Sheriff of the East Baton Rouge Sheriff's
Department; Jeff Landry, in his official capacity as Attorney
General of the State of Louisiana; Kay Holden in his official
capacity as the Mayor-President of East Baton Rouge Parish;
Hillar C. Moore, III, in his official capacity as District Attorney
for East Baton Rouge Parish; Department of Public Safety
(Louisiana State Police)

Defendants.

CIVIL ACTION
NO.

Motion for
Temporary
Restraining Order
and Preliminary
Injunction

Oral Argument
Requested

DECLARATION OF NORTH BATON ROUGE MATTERS

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Crystal Williams. I was born December 25, 1987.
2. I am writing this statement on behalf of North Baton Rouge Matters (NBRM) in support of a temporary restraining order and preliminary injunction filed in federal court to enjoin the City of Baton Rouge, Baton Rouge Police Department, Louisiana State Police, Louisiana Department of Public Safety, East Baton Rouge Sheriff's Department, the State of Louisiana and East Baton Rouge District Attorney's Office from their ongoing violation of our members' constitutional rights and the ability of North Baton Rouge Matters to continue its work.
3. North Baton Rouge Matters is a grassroots community organization. The organization was created to stop the violence, including police violence, in the North Baton Rouge community. North Baton Rouge Matters provides local North Baton Rouge residents essential resources to cultivate a foundation of trust amongst one another. The organization strives to provide the community with access to tools to ensure their voices are heard and that success are truly attainable.

5. Since Alton Sterling's murder on June 5, 2016, North Baton Rouge Matters has organized around the issue of police violence in the community. North Baton Rouge Matters have attended public marches, vigils, and rallies to protest the systemic and racially indiscriminate brutality of the Baton Rouge Police Department. Members have a deep commitment to continued action, including protest.

6. North Baton Rouge Matters, as an organization, has a vested interest in this particular Motion for Temporary Restraining Order and Preliminary Injunction because the named Defendants have continuously violated members' constitutional rights since the murder of Alton Sterling. In addition, continued public action is viewed as an essential part of the organization's mission and work, despite the deep sacrifices members must make to be active in protest due to police reaction to protest in the community.

7. A summary of what members have experienced:

- On Sunday, July 10, members saw significant numbers of militarized police officers from different departments. Helicopters flew overhead.
- Members viewed protests where peaceful protesters watched and chanted against the police on the sidewalk. Despite this, members witnessed police arrest individuals for no apparent reason and actually drag individuals into the road to arrest them.
- Members were involved in a protest where they did not hear the police order people to disperse or threaten arrest if they did not disperse, and yet witnessed mass arrests of peaceful protesters. Members also witnessed the police use excessive force against peaceful people.
- Members heard police officers announce to peaceful protesters: "you cannot leave. If you try to step into the street, we will arrest you." Individuals then froze, but the police continued to arrest individuals. Members have stated that they were afraid to move or even walk away.
- Members experienced a terrifying loud noise from a large siren. Members stated that it sounded like a war zone with the police, siren, and helicopters. Members also reported that they felt terrorized because officers were acting extremely aggressively and were wearing gas masks. Members also witnessed police with AK-47s, assault rifles, and shotguns that were sometimes drawn at protesters.
- Members reported that individuals were arrested from the private property of a woman who gave permission for individuals to stand in her yard to protest peacefully and away from the police.

8. The named Defendants' behavior since the murder of Alton Sterling has caused significant fear and trauma to the members of North Baton Rouge Matters, who acted well within their First Amendment right to free speech.
9. Members reflected that the behavior of named Defendants appeared to be an attempt to shut down a non-violent protest in order to scare people from protesting again. Members protesting against police brutality feared this same brutality because of the behavior of the police since the time of Alton Sterling's murder.
10. Members felt unsafe and felt that they could not express themselves. Although engaging in peaceful protest, members engaging in protest felt like at any moment they could be met with police violence and other repressive tactics. Many members ran away from the protest and stopped engaging in protest due to police actions.
11. As also described, North Baton Rouge Matters witnessed ongoing violations by the named Defendants of the public's Fourth and Fourteenth Rights by the Defendants.
12. Members want to and are committed to continuing to attend and participating in future marches, vigils and rallies in Baton Rouge related to police brutality and the murder of Alton Sterling. This includes the scheduled funeral of Mr. Sterling on July 15, 2016 as well as an event planned on Saturday, July 16, 2016. However, this commitment is continuing being questioned by fear of police reaction to continued involvement in protest.
13. The named Defendants' ongoing, systematic, and violent conduct towards protesters, North Baton Rouge Matters' members, and also the general public, has resulted in a chilling effect on the plans of the organization and its members to continue exercising their First Amendment right to free speech in Baton Rouge.
14. The members in North Baton Rouge Matters fear that without a temporary restraining order and subsequent injunction against the named Defendants, that the named Defendants will continue to violate their Constitutional rights by wrongfully obstructing and dispersing us from public spaces, wrongfully detaining, searching and arresting us, and using illegal excessive force on us.
15. As such, North Baton Rouge Matters would like to see an injunction issued against the Defendants so that members can exercise their constitutional rights in Baton Rouge.
16. I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this 12th day of July, 2016.

Crystal Williams
CRYSTAL WILLIAMS
Founder of North Baton
Rouge Matters


SIGNATURE

Exhibit F

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

American Civil Liberties Union of Louisiana; Louisiana
Chapter of the National Lawyers' Guild; New Orleans Workers'
Center for Racial Justice; Black Youth Project 100,

Plaintiffs,

-vs-

City of Baton Rouge; Baton Rouge Police Department; Carl
Dabadie, Jr., in his official capacity as Chief of the Baton Rouge
Police Department; Louisiana State Police; Louisiana
Department of Public Safety; Col. Michael Edmonson, in his
official capacity as Superintendent of the Louisiana State Police;
East Baton Rouge Sheriff's Department; Sid J. Gautreaux III, in
his official capacity as Sheriff of the East Baton Rouge Sheriff's
Department; Jeff Landry, in his official capacity as Attorney
General of the State of Louisiana; Kip Holden in his official
capacity as the Mayor-President of East Baton Rouge Parish;
Hillar C. Moore, III, in his official capacity as District Attorney
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(Louisiana State Police)

Defendants.

CIVIL ACTION
NO.:

**Motion for Temporary
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*Oral Argument
Requested*

DECLARATION OF HANNAH ADAMS

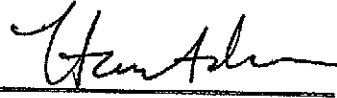
Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Hannah Adams. My date of birth is April 14, 1985.
2. I attended a protest in downtown Baton Rouge on Sunday July 10, 2016. I am a member of the National Lawyers Guild, and I was working as a legal observer.
3. At about 5:30 PM a group of peaceful protesters walked from the Wesley United Methodist Church down Government Street toward East Blvd. The protesters were chanting and holding signs. Shortly thereafter five or six police vehicles and fifteen to twenty police officers arrived and told the protesters that they could not be on Government Street. There were at least two officers in full riot gear with assault rifles. I saw one officer with flex cuffs.
4. The group of protesters turned down East Blvd. and gathered in front of a house. The protesters continued peacefully chanting and holding signs in front of the house.

5. A little after 6:00 my legal observer partner and I walked down East Blvd. We saw a group of police and police vehicles staging at the end of Europe Street.
6. Shortly thereafter we saw a group of probably 40 to 50 police officers begin advancing down France Street in military-type formation. They had a military-style vehicle with them. They were wearing gas masks and holding assault rifles and rubber bullet guns. They began advancing toward the crowd. The vehicle also began to advance. A police officer told the crowd to disperse. Then the officer turned on a painfully loud siren. Everyone began to scream and hold their ears because the siren was so loud. The siren was painful and disorienting.
7. The crowd remained tense but nonviolent. At some point the police began lunging and arresting people seemingly at random. The people arrested were violently pushed to the ground and restrained. I saw at least three people arrested at that time, at the corner of East Blvd. and France Street.
8. At about 6:30 PM the police removed their gas masks all at once. Police began taking shelter in a yard across the street with permission of the homeowner. There were some additional arrests. The police kept telling the protesters to disperse and saying that they could not be on the streets or sidewalks.
9. By 6:40 PM we noticed that police vehicles were blocking both sides of East Blvd. We stayed in this position and things were tense for about an hour.
10. At 7:30 PM there was a line of police officers several rows deep on either end of East Blvd, and in front of us. We were completely surrounded. The police kept telling the protesters to disperse, but we were trapped and had nowhere to go. The line of police, which appeared to be state police and officers from the sheriff's department, began advancing down East Blvd with assault rifles and batons. They closed in on the yard where we were all taking shelter. I was right at the corner of the yard. The officers crouched as if ready to lunge at us. Then without warning they began running into the yard with their guns. Everyone began screaming and running through the yard. We were able to exit out of the back of the yard onto France Street. It was extremely chaotic and frightening. While we ran I could see officers tackling and arresting people at random.
11. I was afraid I had lost my Legal Observing partner but I found her on France Street behind the house. She had scraped up her leg when she fell while running out of the yard.
12. On France Street, I saw a line of two or three dozen police officers plus the aforementioned police vehicle begin to advance down France Street toward us. We kept retreating toward the church. The police officers kept telling us to disperse.

13. I saw a white male officer chase a young black woman down the street when she tried to get to her cell phone, which she had dropped.
14. People were disoriented and frightened. When we got back to the church parking lot people began to disperse. The police stopped advancing.
15. Because of the actions of the police I was very afraid someone would get shot or that they would tear gas us. The police were arresting Legal Observers as well as civilians. It is frightening to think about Legal Observing in the aftermath of what I witnessed.
16. I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this 12th day of July 2016.



Hannah Adams

Exhibit G

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF LOUISIANA

American Civil Liberties Union of Louisiana; Louisiana
Chapter of the National Lawyers' Guild; New Orleans Workers'
Center for Racial Justice; Black Youth Project 100,

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DECLARATION OF ADINA MARX ARPADI

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Adina Marx Arpadi. My date of birth is September 15, 1990.
2. I legal observed a protest in downtown Baton Rouge on Sunday July 10, 2016. I was trained as a legal observer by the American Civil Liberties Union of Louisiana.
3. We were at Government and East Street. Around 5:30pm, protestors walked from the Wesley United Methodist Church down government Street. Police showed up in many different cars. Some were in full riot gear and carrying assault rifles. Others were in regular uniform. They had flex cuffs. They told us to clear the street.
4. Protestors were not sure what the police wanted them to do. It was clear to me that they wanted people to clear the street, but I think some people couldn't hear the instructions. Also, people were not sure where to go, and orders concerning how long people had to clear the street were conflicting.
5. The crowd turned right down East Blvd. The police were staging Europe Street and 10th street.

6. Protestors started gathering on the porch of a house on the corner of East and France. There were also protestors in the street on East Street, but they were not obstructing traffic.
7. Police started coming down France Street from 10th Street with ear-splitting LRAD military sirens, a police tank, assault rifles, and gas masks. There were about 40 or 50 of them, in a formation of four or five rows of about ten.
8. As the police were approaching, I saw the contents of a garbage can being thrown. The police then began lunging at the crowd.
9. As people scattered, the police were randomly tackling people and throwing them to the ground. I saw at least three people get arrested.
10. I also saw a man in a purple shirt standing on private property on the corner of France St and East St, standing in the yard. Police suddenly arrested him for unknown reasons. He was not provoking the police at all.
11. Protestors went back to the other side of East Street. One homeowner, Lisa Batiste, invited homeowners into her yard. Many people were on the sidewalk in front of her house and standing in her yard. Around 7:30pm, we suddenly realized that the police had surrounded us. There were lines of police on either side of East Street and on France St. There were both police at the scene, and they had full riot gear on, in line formation. Sheriff's seemed to be at the front of the line with the largest shields.
12. We were in front of the house, on the side farther from Government Street. As the police line drew closer to the house, they spread out on to the sidewalk in addition to the street, so the police were blocking the sidewalk with their bodies. We couldn't turn right to go down East, we couldn't go straight because another line of police were coming in, and we couldn't go left because of another line of police. The only place to go was into her yard. Once in the yard, they then charged towards and into the yard, chasing people farther back into the yard. Her back yard connects to the street, so people ran through the front yard, into the back yard, and then onto France Street.
13. I saw police chasing people and tackling protestors as they left her yard onto France Street. This occurred either on or immediately next to her property. I could not tell at the time.
14. The police began pushing the crowd up France Street, past Maximilian, past St. Joseph, and finally past the McDonald's right before Napoleon. They said several times "this is an unlawful assembly." We saw a light skinned black woman arguing with a white police officer in a white and blue polo shirt in the McDonald's parking lot. He started chasing her, and she ran away.

15. I plan to do more legal observing of upcoming protests. Out of fear for my own safety, I attended an additional training session for legal observers.

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

Executed on this 12th day of July 2016.


Adina Marx Arpadi

Exhibit H

I, Brachell Brown
declare under penalty of perjury
under the laws of the United
States that this statement
is true + correct.

I make the following
statement based on personal
knowledge.

I am 20 years old.

On Saturday July 9th
around 10pm, the protestors,
including me + my brother
were at Airline Dway
just before the interstate.
We were out there about
40 minutes before police
came when we got out
there we were holding
up our signs + chanting
in front of the police
department on the sidewalk
behind barricades.

The police were in the

parking lot. They were in normal police uniform. Then the officers with riot gear + plastic shields came outside. Then we went to the opposite side of the street to get away from them.

Once we went to the opposite side they came to the opposite side and faced us. They were tapping their shields with their batons. The police stopped traffic to confront us. We shouted move.

We stayed on the sidewalk + continued down Airline. The police were beginning to huddle. There were things flying in the sky with red beams and a helicopter.

We crossed the street to avoid traffic getting on the interstate. The SWAT team was there in tanks and they cut us off. They were face to face view with us and some had badges with black tape covering their name.

The police did not give us any orders. I saw them driving fast down airline to push us back toward the direction from where we came.

The police had pulled guns + were running toward us + we started to run. We started to slow down + tried to get back to the sidewalk across the street to get to our cars.

In my peripheral I saw a cop point at me.

Then I was tackled to the ground. I was not given any orders. I landed on top of my brother who was with me. We were both tackled by police, there were at least four.

I immediately put my ~~my~~ hands behind my back. An officer started to choke me. I heard a taser go off + an officer tased my brother. An officer put their knee in my back. They zip-tied me while I was down on the ground.

I stood up and asked for my phone. The officer took me + my brother's phone. I think there were 37 people on the bus, it was a prison transport bus + they called us the Airline 37.

We went to the police station on Airline. I asked them to loosen my zip tie me. Then they handcuffed me to another person.

Once they finished giving us our charges, they put us on a van. One officer called us hypocrites. Then they took us to prisoner transport downtown. The heat was on Full blast in the van.

I was in central booking in East Baton Rouge with about 40 other girls in a cell. I heard an officer threaten a man saying "somebody is going to get shot tonight".

When we were getting released + were in central booking. The male cell was shared + was shocking

4 coughing because it
came down the hall.

Rachel Rouz
July 11, 2016