

Exhibit I

Declaration

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

I ~~was~~ ^{am} making the following statement based on personal knowledge.

I am 22 years old.

On July 9 around 10 pm, I was on the side of the Circle K with my sister ^{Brackett Brown} and other protestors. I was holding up a sign. There were more than 100 protestors outside. We were behind a barricade.

I didn't see anyone throw anything at any officers.
I didn't see anyone being aggressive towards the police.

There were police officers in the parking lot of the police station. Out of nowhere, police officers in "riot gear" came out. They had head gear with helmets. The officers started hitting on their plastic shields with their batons.

We started to move down the street away from the police. The police started coming into the street and we yelled at the officers to "MOVE". We yelled three times for the officers to "MOVE". ~~The~~ The officers moved back to the side of the street where the

When we got to central booking ~~the~~ the male protestors were put in one cell with about 40 or 50 of us together. There were two empty cells available.

We were treated like animals. Anytime we made a request they ignored us. They were very rude and disrespectful. The part of the prison we were put in had not been used in over 30-40 years according to another inmate in the prison. The trustees were told to clean up that part of the prison so the protestors could be housed there. We were only fed once. We missed lunch because they made us watch a video about sexual assault in jail.

The wing of the prison we were in had no mats or blankets. The showers didn't work and the sinks were dirty. There were two of us to a cell.

There was a guy named Javier Dunn who came into the prison with lots of cuts on his face and ~~and a really~~ ^{a really} bad swollen eye.

I asked multiple times to be seen by the nurse to look at my laser wounds.

When I went into court in front of Judge Jackson, ^{Bonnie} told us she would set 5 bonds and then go to church to pray about the remaining bonds. ~~§~~ Judge Jackson left court and came back to set the other bonds.

When we were being processed out in Central Booking One of the guards told us to be quiet or he would pepperspray us. There ^{were} about 30 guys in the cell at the time. About 30 minutes after the first time the guard peppersprayed us, one of the other guards ~~sa~~ said ~~pepperspray~~ "Hit them again." The same guard peppersprayed us again. The guard who ~~peppersprayed~~ peppersprayed us was a heavy set white guy. We didn't receive any medical attention. I was released about 45 minutes later.

The entire time I was in the prison I was never called an inmate. I was referred to as a "Protester".

Christopher Brown 7/11/16

Exhibit J

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 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 JULIEN BURNS

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

1. My name is Julien Burns. I am 28 years old and live at 725 Congress Street in New Orleans.
2. I attended the protest over the death of Alton Sterling on Sunday, July 10. After the march, the protest became more organic and was at the intersection of France and East Boulevard.
3. The police directed us to be off public property, so I went onto the property of a woman who said that we could be on her lawn.

4. When the cops charged, they started grabbing people who were standing in the grass. I started to leave and then saw a cop stepping on a woman's head. I stepped forward again to take photos of the police treatment of her.
5. I then went to leave as the cops were moving on people even more. I rejoined the crowd, and one cop began chasing after me from behind and tackled me to the ground. He and another cop climbed on top of me and together zip tied my wrists together while I lay still. They yanked me around and tightened the zip ties to the point of me losing feeling in the fingers on my right hand and in my palm on the left hand. The second cop that helped to pin me to the ground tore my iPhone 6 from my hand and left with it. It was never returned to me.
6. I was then hauled up by the zip ties and walked to the police van. We spent the next hour and a half driving around the protest until eventually being put into another police van. Approximately ten people were in the van. No one was seat-belted. There was a lot of verbal abuse including the supervising officer repeatedly threatening to "knock our asses off" if we made noise. We were not told why we were being detained, read any Miranda rights, or told where we were being transported to despite multiple requests for that information. I noticed at this time that one other arrestee—Antonio—requested medical care because his ankle was swollen from being dragged but his request was ignored.
7. We were then brought to the police station. No statement or Miranda warning was read to me. We were then put in the van and transported to East Baton Rouge Parish Prison. By the time we reached the jail, four and half hours had passed since we were first arrested. There was no food, water, or medical care provided during this entire period of time.
8. I was put in a 12-by-12 male holding cell. There were 26 prisoners being held in the cell. One of the gender non-conforming defendants requested to be housed with women prisoners. Their request was ignored. Eventually we were taken in groups to change into orange jumpsuits. We were brought into a bathroom and strip searched as a group. My gender non-conforming co-defendant was mocked by the guards for their 'alternative lifestyle.' Another arrestee was mocked and abused when the supervising officer did not believe there was enough compliance with the spreading of his butt cheeks.
9. We spent the night with 26 of us in the one cell without any bedding. Because of the crowded space and the thin jumpsuits we were wearing, many stood throughout the night because it was too cold and cramped to lay on the floor. After several hours we were finally given one cooler of water that only provided a four ounce cone of water per person. We were not given any food for the first ten and a half hours of our detention. We were then fed "pancakes" and a black meat substance.

10. Throughout the whole time we were locked up, we were given wildly different information about what we were being charged with, what our bail was set at, and when we would be able to be bonded out or see a judge. We were not given any paper documentation of anything about our arrest until our release.
11. In the morning, we were transferred every half hour or so for the next three hours to different holding cells without any explanation. Guards continued to refuse to answer our questions. One cell we were taken into during this time showed us a video about how to not get raped in prison. It included segments for facilitated conversation that no jail staff members were present for.
12. We were given access to a bathroom with toilet paper for the first time at 9 or 10am. The only toilet in the cell did not have toilet paper or running water. We were finally assigned a cellblock around 11:30am.
13. Eventually we were brought for our first substantial meal at lunch. It consisted of black meat product and white beans and rice. We were given five minutes to eat lunch and if we had not finished by that time, we were required to throw the remainder away. There was no water provided in the cell block. ^{FOR MOST OF THE TIME} During our entire incarceration, we were only able to get four ounces of water three times.
14. Whenever we spoke above a whisper we were threatened with punishment ranging from losing access to phones to losing our court hearing date to being maced. At about 3pm we were taken back to the holding cells with no explanation given. We were then brought to a video conference with the judge.
15. At no point did the staff have an accurate list of the prisoners and where they should be at any given point in time. They frequently called out for prisoners that had been released or were unaware why people were locked up to begin with, including one prisoner who had been in the East Baton Rouge Parish Prison since Friday July 8th. The supervising officer in the video courtroom constantly berated and demeaned the prisoners and referred to another unit as a "slave plantation." ^{Q3} By the time we left there were 29 prisoners in the 12' by 12' holding cell. When I was finally about to be released, the staff forgot me for approximately 20 minutes because they were too involved in their own conversations. ^{Q3}

Executed on the 12th day of July 2016.



Julien Burns

Exhibit K

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; Louisinana
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 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 RANDOLPH CARR

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

1. My name is Randolph Carr and I live in New Orleans, Louisiana.
2. I was there in Baton Rouge, Louisiana on July 10, 2016, while protests were happening. As a member of the community-organizing group, BYP100, I decided to travel to Baton Rouge to support my friends protesting the treatment of the Black community by law enforcement. I also went to observe police tactics being used against protestors, since I had heard about the use of tear gas and AR15s by police. I wanted to make sure people were safe.
3. At about 10:00pm, as I was peacefully gathered on Airline Street alongside others, I saw two police lines forming in front of us. The police were carrying what looked like AR15s.
4. Suddenly, without making any order to disperse, police executed a maneuver in which they took a collective running step forward. People stepped back to the edge of the sidewalk, but the police again did the same sort of maneuver.
5. At that point, I saw the police form a circle around a man and arrest him, and I heard the sound of tasers and screaming all around. In the midst of this, I heard from people around me that someone else had been taken. I went to try to get

close to that guy to get his name. The police had formed a circle around him though, and I couldn't find out.

6. The police stayed in this area for another 15 minutes before walking back to police station. Then I saw them turn off the lights at the station.
7. The whole time the police were there, I was just trying to make sure that the folks who were with me were safe. I wasn't that surprised that they acted like that because the police usually do that.
8. The intended effect is for people to be afraid. And many people who get caught up in these situations are afraid. They are arresting people so arbitrarily that people are getting even more agitated. That fear is producing an energy where people are on edge. Who knows what will happen to that energy?
9. We were just hanging out on the corner until the police arrived. When the police arrive, suddenly it's a confrontation. That tactic is completely out of whack.
10. Protest needs to happen because people are just fed up. It's important for that to be recognized and for us to see other people who are fed up too.
11. I'm not under the illusion that I have a first amendment right. Many people that are out there understand that it's an illusion. We're literally just gathering on a corner, and this is what the police do. What assumptions do you have to make to react that way to people hanging out on a corner?

Executed on the 12th day of July 2016.



Handwritten signature of Randolph Carr, consisting of a stylized cursive script.

Randolph Carr

Exhibit L

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 for East Baton Rouge Parish;
Department of Public Safety (Louisiana State Police)

Defendants.

CIVIL ACTION
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**Motion for
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*Oral Argument
Requested*

DECLARATION OF SABRINA CARTER

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

1. My name is Sabrina Carter. I grew up in New Orleans, Louisiana and I still live in New Orleans.
2. I went to the protests against the shooting of Alton Sterling in Baton Rouge on July 10, 2016.
3. I came to the protests because I have seen the police target and harass people in the communities where I've lived, in Black communities. What happened in the shooting of Alton Sterling reflected back those experiences and so I went to the protests to speak out against this.
4. When I arrived in Baton Rouge, people were already marching toward the Capitol and I joined that march. It was very peaceful.
5. When the march left the Capitol area, we walked on the sidewalks of Government Street. I was following along as we were all just walking, and then I saw at one point that police cars had driven and blocked off the street. We couldn't go any further that way.
6. We turned onto another street because we couldn't continue on Government Street. But then up ahead was also blocked by the police. We were just standing because we had to figure out what to do. It was hard to move.

7. First the police told us that we had to get off of the streets, so we got off the streets. Then we were told that we had to get off the sidewalks and then we got off the sidewalks. But the police still came after us. I don't know why they had to go that far and respond to us like that. We were peaceful.
8. The car that I came in was parked on the original street where this was all taking place. So if I decided that I wanted to get away and go, there was nothing I could do. The police were all over and there was no way to get to the car I arrived in.
9. I was standing in the yard of a house where a woman told us that it was okay if we stayed on her lawn. But then an armored police car came out and was rolling toward us. A SWAT team with shields and everything started approaching us and we backed up. They used a sound cannon to make an annoying ringing in the direction of the protestors.
10. I went to a different house to get away from the police. I stood in the lawn of the house further away from the police. The police were proceeding toward us and toward the first house where I stood in the yard to be safe. The police were yelling at us to dismantle or disperse. And we didn't know why they had to go that far. There were people asking the police from a distance, "Why can't we protest? Why can't we do what we came out here to do, to make a statement?"
11. The police kept coming and were still yelling at us to disperse. I could see people were cluttering in the yard in the first house. But the police marched forward and were following everyone aggressively. The homeowner was on her porch, saying it's okay, it's okay for them to be in the yard. I heard someone say, "they came into her house."
12. Because the police were still coming forward, I crossed the block and went to a third house to stand in the yard to be safe. I was trying to see where the car I came in was at. I was afraid to do anything.
13. The police came further down the block toward where I was standing. They were rushing toward where I was, chasing everyone. The police came to about five feet away from me. They pointed big guns at us.
14. The protestors that were standing by me told us to put our hands up. I didn't want the police to think that I did anything wrong. I had a poster and a cardboard sign. But I dropped both of them and put both of my hands up.
15. Even as the police were coming closer, I still thought they wouldn't do it-- wouldn't rush all of us and chase and arrest so many people. I thought I would have time to get away. But the police came really quickly. I kept my hands out and started to walk back. I heard the police talking to each other saying grab him, grab her. I thought I was going to be grabbed. People around me got arrested. I saw someone be tackled to the ground. Fortunately, I wasn't grabbed. I ran away and the police didn't arrest me but I was terrified to be so close to police with their guns pointed at us.
16. The police were still following. But I went to McDonald's. There were about 20 people who had gone there for shelter. Then someone from McDonald's told us we have to leave.
17. I went out to protest because I've seen the police target people in my community. When I heard that Alton Sterling was shot by the police, it struck a chord with so many other stories of people in the Black community.

18. I used to get stopped all the time by the police when I was driving the car I used to own. I and my partner both had decent jobs and were trying to buy a house. But none of that mattered to the cops, I kept being stopped by the police in my neighborhood and they would ask me who the car belongs to. It was my car.
19. They stopped me while I was driving because they thought I was a young black man. The windows of the car were tinted just a little bit. So even though I am a black woman, the police thought there was a black man in the car and they would stop me. So I started riding with the windows down around town so the cops could see that it was a woman.
20. It used to be much better. In about 2011, police used to walk the beats, walk the neighborhood on foot. They knew a lot of us as a result, and it was much better. Now, police stop people just because they're black.

Executed on this 12th day of July 2016.

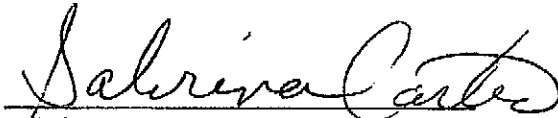

Sabrina Carter

Exhibit M

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 for East Baton Rouge Parish;
Department of Public Safety (Louisiana State Police)

Defendants.

CIVIL ACTION
NO.:

**Motion for
Temporary
Restraining Order
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Injunction**

*Oral Argument
Requested*

DECLARATION OF TAMMY LYNN CHENEY

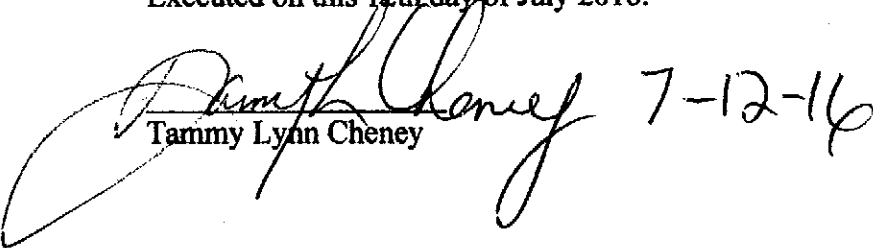
Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. My name is Tammy Lynn Cheney. I was born on December 5, 1974.
2. I attended the peaceful march in Baton Rouge on July 10, 2016.
3. I was traveling through Louisiana on my way home to North Carolina with my 17-year-old daughter and 5-year-old son, and after attending the march in New Orleans on July 8, I decided to stay in the area to attend the Baton Rouge march. I attended the march because I have witnessed many incidents of police misconduct and have been harassed myself in the past.

4. Two years ago, while I was at the grocery store, police with dogs came to my house, tore apart the house, dragged my kids out—my daughter was then 15, and my older son was 17—and had them on the ground with dogs and guns on them. Then they realized they had made a mistake and by the time I got home they were gone. But by then all of the neighbors had seen what happened, and we were evicted soon after. We left Florida because of that. So my heart went out to the victim's family. I knew I needed to stand with these people. It isn't just a black/white issue; police brutality affects everyone.
5. The New Orleans and Baton Rouge marches were the first protests that my daughter, son, and I had ever attended. We had never done it before. The protest was so peaceful on Friday in New Orleans, then so peaceful on Sunday when we went to the Capitol and back.
6. After the rally at the Capitol, we marched back to the church and then stood in line for food for about 45 minutes before getting in our car, which was parked by the church. We were planning to drive out of town to continue our trip.
7. We took the route our Google maps told us to take, but when we got to about East and Government, the police closed off the whole road in front of us and we couldn't continue. So we pulled into a parking lot to wait until the road re-opened and the traffic lessened so we could get out.
8. My 17-year-old daughter decided to go around the corner to videotape what was happening while we waited. I stayed at the car, standing on top of the car holding signs with my son and another woman whom I had just met. My sign had a Bernie Sanders quote on it.
9. After some amount of time, I all of a sudden saw cops with gas masks and shields. There were about 30 or 40 of them coming my direction toward whatever was going on down the road. Then they went around the block and came up the road directly behind us. I told my son to get into the car and lock the doors. I had the car running and the air-conditioning on for him. I was still standing silently on top of my car, holding my sign. At no point did I yell anything or say anything to the police.
10. In that time frame, my daughter had come back to the car. The other woman was still on top of the car, and I jumped down and said, "Alexis, get in the car and I'll be right back – I'm going to take a couple more pictures and then we'll leave." I walked a short distance away from the car to videotape, and the police immediately arrested my daughter. She told others my name, and I heard the crowd screaming "Tammy!" and then "Let her go! Let her go!" over and over.
11. As soon as I heard my name, I ran back toward the car, but the police blocked me and wouldn't let me pass. In the meantime, they had taken my daughter away, the other woman had left, and they were getting footage of my son alone in the car. After they got that video, they let me break through and get to the car.

12. Immediately afterward, however, a police officer grabbed my arm, said, "You're going away for a felony! You abandoned your son!" and arrested me. His name was Larouse.
13. I said to Officer Larouse, "This is exactly why we're here, we're standing for justice." He said, "do you want me to throw another felony charge at you?" I said to another officer nearby, "You're his brother, aren't you? You can't let him do this to me! He's not telling the truth!" He said quietly so that Officer Larouse couldn't hear, "Yes, he's my brother. Don't worry, this is not a felony; it's going to be a misdemeanor."
14. I was trying to look at my phone to see if the video was still going, and the arresting officer grabbed my phone but couldn't tell that it was filming. He gave my phone back, and I started calling people to tell them I was under arrest. He took my phone and tried to put it in the bushes. When I appealed to another officer – Officer Bell – about it, he said, "I can't do anything for you, he's my boss." Later, Officer Larouse put my phone on top of the squad car, and Officer Bell stuck it back in my bag.
15. We were in the holding cell for eight hours. Then they split my daughter and me up when they put us in with general population. They said explicitly to my daughter that we were being separated because we had asked to be together. So my daughter was in an adult male prison alone.
16. They gave us no toilet paper or blankets. Most people didn't even get a bottom sheet to cover the bunk. It felt like it was 40 degrees in there; in my cell we were all huddled together under a mattress because we were so cold and didn't have any blankets.
17. When I got back to my car, I found that police had gone through all of the belongings in my car, taken my protest sign, damaged my trunk, and broken off my side rearview mirror.
18. This experience scared the daylights out of me, and I will never go to a protest again.

Executed on this 12th day of July 2016.


Tammy Lynn Cheney 7-12-16