

Exhibit N

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 CARESSA CHESTER

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

1. My name is Caressa Chester. My date of birth is July 12th, 1990.
2. I attended the protest in Baton Rouge on Sunday, July 10th, 2016. I am not affiliated with any organization. I was in my capacity as an outraged and concerned citizen who wanted to take action against the many unjust killings of black citizens by the police.
3. I arrived in Baton Rouge at or around 4:30 PM on July 10th in a car with three other people. Two of the people are also black and unaffiliated with any organization. One of the people was a friend who was coming to act as a Legal Observer to the protest in her capacity as a staff member of the New Orleans Workers Center for Racial Justice.
4. We were driving to a church where the protest was supposed to begin, but by the time we arrived, the crowd had already moved into a mixed residential and commercial neighborhood. I later learned that the protesters had attempted to block the freeway but had been prevented from doing so by the police.
5. We parked the car when we found a spot and joined the crowd chanting, near a McDonald's. I don't know Baton Rouge very well.
6. From my point of view, the protest was, at this time, completely peaceful. Police occupied one side of the street, and protesters occupied the other. As protestors, we were chanting but there was a significant distance between us and the police,

and I did not witness a single protester confronting the police. No cars were passing between us and the police.

7. The protest was the largest I had ever been to in my life, and I have attended many protests in New Orleans where I currently live. There were so many protestors they were overflowing onto the street from the sidewalk.
8. Roughly 15 minutes after I arrived, police wearing full riot gear with large guns in hand marched towards us. Behind them was a tank, with at least one person perched atop it carrying a megaphone. The police were all wearing dark blue or black uniforms, marching in military style. There were at least 100 cops, from my perspective. The cop on top of the tank began ordering for protesters to get out of the street.
9. Immediately after the police began giving their orders, someone in the protest yelled for the white people to take front positions in the crowd. Immediately, at least 50 white people moved up. In my opinion, roughly 30-40% of the protestors were white; the remainder were black.
10. At this point, the white people who had taken positions at the front were standing on a median in the middle of the road. The crowd continued to chant while all of this was surpassing.
11. I then saw a young black male protester trying to cross the street get tackled and arrested by the police. I was shocked because from what I could see, he was nowhere near the police, and he was simply crossing the street, I assume to be with his friends. I cannot remember whether the police who tackled and arrested him were uniformed or undercover; because he was so far away from the lines of military style police I cannot be sure.
12. The police kept ordering us back out of the street, and after watching an innocent protester get thrown to the ground people began to comply. Eventually, everyone was off the median, onto the sidewalk and into a lady's private, partially fenced in yard. I had heard this lady - a middle-aged black woman - invite protesters onto her lawn earlier. I felt that she had done so knowing that it was her right as a landowner to have protesters on her lawn.
13. At some point, despite the fact that nothing had changed, and no protester had provoked the police, the megaphone announced: "THIS IS NO LONGER A PEACEFUL PROTEST." I was surprised because in my opinion, the protest was completely peaceful. I could not hear the remainder of what the police announced, because I could only hear the protestors dissatisfaction and disbelief with the police's arbitrary announcement.
14. Every so often, the police would march a few yard towards us in a line with the tank rolling up behind them. The police also kept reaching into their pockets and appeared to be threatening to tear gas the crowd. The police were also laughing at us. The majority were white.
15. The crowd stood their ground but over time it became clear that if you were sticking out of the crowd in any way, the police would tackle you to the ground, handcuff you and take you away.
16. A second group of police then became visible, marching forward and backing part of the crowd towards the church from which the protest had originated.

17. Then, the first group of military style police moved onto the lady's yard where there were many, many protesters, partially fenced in. I watched as the cops brutally tackled, shoved, and arrested protesters. I saw a cop grab someone and throw them on the ground; I saw a cop throw someone and let them go. The first thing I saw was a cop literally tackling someone to the ground and handcuffing them; they were being extremely aggressive. Their aggression and the arbitrary way they were arresting people who were fenced in and had nowhere to go was what scared me.
18. When I realized that they were really hurting people and with no respect for the landowner's property or the fact that there was no way to disperse, I began to run back with other protesters in fear. The worst part was that the police were breaking the law, or at least showing no respect for it, particularly when protesters thought what they were doing was law abiding and peaceful.
19. Then, the police would form a wall blocking our path, arresting more protesters.
20. We would then run in a different direction, until we were halfway back to the church. After a few times of having the cops move on us, what had once been a solid crowd was now dispersed everywhere - some to the church; some to the McDonald's parking lot, and some into the neighborhood.
21. I stayed with different groups in different parking lots for another 90 minutes, discussing the protest and bouncing ideas off of each other. After nightfall, a group went to triple E where Alton Sterling had been shot, but it was dark and I was scared that things would become even more out of hand and dangerous there.
22. Running from the police felt worse than political inaction, so eventually I left.
23. I don't know what happened to the landowning black lady who kindly let us onto her property.
24. Since the protest, I have not been able to shake a feeling of fear and sadness. To be immediately in front of a police force that wields so much power and to know that they do not respect the law, makes it feel impossible to protest. There has been criticism in the wake of the protest of the organizers and the lack of discipline among protesters - while there is room for us to strategize more, the real issue is that people are scared to be seriously injured and arrested by a police force that has no regard for our legal, peaceful activity.
25. I feel intensely demoralized. While I will in all likelihood return to the protests, I don't think I will be returning this week.

Executed on this 12th day of July 2016.



Caressa Chester

Exhibit O

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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)

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*Oral Argument
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DECLARATION OF MARQUITA D. CHRISTY

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

1. My name is Marquita D. Christy. I was born on May 22, 1987. I am from Donaldsonville, Louisiana and attend school in Baton Rouge.
2. On July 10, 2016, I attended the youth-led march in Baton Rouge, beginning at Wesley United Method Church on Government St.
3. At this protest, police officers from multiple departments and forces did their best to stifle our speech over the killing of Alton Sterling by police officers. I could not decipher where all the officers were from, but I did see Baton Rouge Police Department (BRPD) Officers and deputies from the Baton Rouge Sheriff's office. There were officers in other uniforms present that I was not familiar with. The majority of vehicles that I saw blocking off streets were from the Baton Rouge Police Department.
4. Upon first walking up to the crowd, I saw BRPD had Government St. going toward I-110 blocked off. There were protesters on both sides of the Government St. and East Blvd. intersection, with the majority on the side closer to France St.
5. My fellow protesters and I saw massive amounts of uniformed officers. The vast majority of them were dressed in military-like attire and equipped with gas masks.

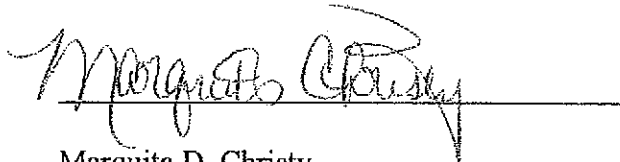
- Some carried clear plastic shields, billy clubs, automatic weapons, helmets with plastic face shields, zip ties on their waists, and bullet proof vests.
6. The protest was peaceful when I arrived and throughout the entire time I was there, until the police made an attempt to disperse the crowd.
 7. When I first arrived at the protest, the police played a loud siren. It was a very irritating sound that they played for a few minutes.
 8. The protesters were chanting and dialoguing amongst ourselves, expressing how unnecessary it was for the officers to be dressed in military attire when everything was so peaceful. Throughout the protest I was between the corner of Government St. and East Blvd. and East Blvd. and France St.
 9. The only people I saw on the neutral ground appeared to be media personnel—photographers, videographers, and newscasters.
 10. I was standing on the grass in between the sidewalk and East Blvd, majority of the time I was on the sidewalk on the corner of East Blvd. and France St., in front of the home of the Good Samaritan Baton Rouge resident that allowed protesters to remain in her yard to avoid spilling over into the street.
 11. I feel the police force presence alone provided a heightened awareness of potentially bad encounters with them and brought about fear in the people. The officers' actions escalated the situation.
 12. Throughout the protest whenever someone walked in the street making the officers look "antsy", we would immediately call out to them (the protester) and ask them to remove themselves from the street to abide by the "law." This "law" was ever-changing with each announcement they made on the PA.
 13. At times, throughout the protest the officers would make an "announcement" for everyone to get on the sidewalk, but the system they used was not loud at all. And absolutely everything they said was muffled. I believe the bullhorn I had in my possession was louder. The crowd was constantly confused whenever something came from their PA system, because it was difficult to actually decipher the message. I stayed on the sidewalk after another protester let me know the officers were giving different demands, randomly.
 14. There was no one throwing things at them from what I could see and I was in the front of the crowd the majority of the time and could see the officers pretty well right up until they completely closed in the yard. The situation climaxed when the officers went into the Good Samaritan's yard and started arresting people and arresting people on the sidewalk on the outside of her yard. At that time, I was across the street from the house.
 15. A few times there was an order from a PA the officers had, but the instruction was never clear. I would only be able to understand every other word and figured whenever I heard "sidewalk" or "street," that it was probably a good idea to be cognizant of my footing and that of those around me. I do not feel people were obstructing the sidewalk. All people I came across were very polite and considerate and navigating the sidewalk area was not a problem.
 16. The Good Samaritan lady who let protesters into her yard was trying to help. There was a large number of people already in her yard, long before the police charged. However, when they boxed the crowd in, those that were on the sidewalk

- in front of the lady's yard backed themselves into the yard. It looked like they were herding cattle.
17. Some of the police instructions were vague and confusing. We were told to get out of the street, then after complying we were told to back up on the sidewalk, after complying with that, when people were in the yard it was stated over the PA "that's not good enough."
 18. It was very difficult to understand what the police were instructing people to do. Absolutely everything they said was muffled.
 19. At one point, I did hear the officers state "this is no longer a peaceful protest, if you don't move you will be arrested."
 20. The situation escalated further when it was clear that law enforcement was going to attempt to box the crowd in. While the officers were blocking the following intersections: Government St. and East Blvd. (on the I-110 side), France St. and East Blvd (on the side closer to I-110), and East Blvd. and Europe St., it was apparent they were getting ready to clear out the crowd. When I noticed this, I walked over to Government St. to speak with people I knew who were observing the protest to see if there was a way for people to lawfully exit and avoid arrest.
 21. Based on the prior events of the weekend we came to the conclusion that it didn't really matter what was legal or not, that the law enforcement would do whatever they wanted. I obtained a bullhorn from someone and proceeded to walk back towards East Blvd. and France St. at that time, I started to announce to protesters that we should walk back to the church. A good bit of people started to move, and around the same time, the officers closed in on the crowd.
 22. Based on how the officers had the streets blocked off the only feasible way to leave the area was down France St. in the direction of Downtown Baton Rouge. I think people were afraid to leave because they would have had to walk past the police. I went in the opposite direction because the people I saw being arrested were just standing there.
 23. Without the police rushing the crowd and tackling people to the ground to arrest them, people could have simply walked away from the protest. Instead, the police caused a panic and people began running.
 24. As a result of police actions, I don't believe it was possible to leave the area in a safe manner, because some people were running, some standing still.
 25. I witnessed many people get arrested. They were on the sidewalk or in front of the lady's house in the grass or in her actual yard. Those that I witnessed getting arrested did not seem to be doing anything wrong, the police just tackled them.
 26. Some of the people being arrested would have four to five cops attacking that one person. Also some of the people arrested in the yard and on the outside of the fence were thrown to the ground very aggressively.
 27. There were plenty of officers with automatic weapons on them. I did not see the guns pointed directly at anyone but all the officers had their fingers on the trigger and appeared ready to use them when they were in the yard.
 28. I firmly believe that the officers were trying to shut down a peaceful protest because they were tired of being out there. By violently handling and arresting people, I would assume that was supposed to be a deterrent for those who luckily

did not get arrested to not return or attend any other events, to instill fear in them that arrest was not something so far-fetched.

29. I believe my right to express myself freely was hindered by the actions of the law enforcement officers present. It was terrifying to protest and continue to chant and lead chants with officers looking like they were itching to bring harm to these peaceful people, to watch those across the street (about 4), not dressed in full out riot garb, taking photos of us, then collectively laughing at us, dancing to chants; completely missing the importance and seriousness of the reason we were out there in the first place was even more troubling. I do feel I was in the right place at the right time, because the area where a majority of the protesters were arrested was the very same area I was planted for some time. A girl I stood next to pretty much the entire time was arrested.
30. Despite my being afraid, I do not feel it showed on my exterior. I led chants, learned new chants, partially lost my voice. Despite what the enforcement officers did or could have possible done, I voiced my opinion.
31. I will not stop either. I will be acting as a legal observer in the days leading up to the funeral service of Mr. Sterling, as well as attend a prayer vigil.

Executed on this 12th day of July 2016.



Marquita D. Christy

Exhibit P

DECLARATION OF RICKY COSTON

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

1. My name is Ricky Coston. I was born on October 28, 1993, and except for a short time right after Hurricane Katrina, I have lived in New Orleans, Louisiana my entire life.
2. I am a member of the group Stand with Dignity, and I went to the protests on July 10 with other Stand members and organizers. I wanted to support the protesters in Baton Rouge because I believe I should have equal rights. I believe that you shouldn't hate.
3. After the march to the Capitol that day, protesters kept walking together. Then, police stopped the group of protesters and boxed us in one area. This woman that lived in that area told protesters that they were welcome to stay ⁱⁿ her yard. *protest R.C.*
4. Despite this refuge, police were still intimidating us. They were standing across the street from the lady's house, and I could see some of them smirking. It seemed like they were just waiting to go back to their usual lives, like they knew we weren't going to be able to change the way that we were treated.
5. They kept charging us, pushing people to the ground, and arresting protesters. It seemed like they were just arresting everyone they could.
6. I was near the woman's yard, standing right by a silver car and watching police respond to protesters. The police gave everyone a ten-minute warning, but people started chanting that they couldn't tell us where to go. When they charged, I was thinking that I couldn't believe they were doing that.
7. At one point, I saw police throw this one girl to the ground, and then suddenly it looked like the SWAT team was filling the lady's yard. Everything happened so quickly. I was really scared, especially for the kids that were in the area, and ran away and got into a car with two of my friends. We drove away to safety.
8. While it was happening, I couldn't believe that the police were charging at us like that. It seems like they are not interested in hearing anything we're trying to say. I came to this protest because there is a problem with the police and their treatment of black people. But the police were just laughing at us, mocking us, and then attacking us.
9. If police keep responding with violence to peaceful protesters who just want to talk about the problems with racism, then I'm afraid protesters will respond with

violence. That's not good, because violence doesn't get anything done.

10. I'm so frustrated because what can we do when the police hate us because of the color of our skin?

11. I believe that communities need a restorative justice model, where police are not as punitive as they are now. We need to negotiate. If black people could sit down and talk with people who have power over the police, if we could share with them our stories and let them share with us what they are worried about, then we could start to solve this problem. But right now, the police don't want to listen to us. Neither does anyone else.

12. But until that happens, we are going to keep protesting. We're going to keep demanding more justice. We're going to keep calling for more peace.

Executed on this 12th day of July 2016.

I state the following is true to the best of my knowledge.
Ricky Colson
Ricky Colson

including the police R.C.

they also police themselves R.C.

demanding justice R.C.

when police abuse their Authority

they become tyrants to communities people etc.

2. I believe the police should take a restorative approach. Instead of the law enforcement being looked at as monsters and criminals, the police should be for the people. Not punitive. The Gov. should be for the people. Not prejudiced and racist. You All should be for the people. Not prejudiced and racist.

Its been stated some officers get sent to a certain area of the community. I believe these are communities that needs to stop.

Exhibit Q

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

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Defendants.

CIVIL ACTION
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*Oral Argument
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DECLARATION OF JENNA FINKLE

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

1. My name is Jenna Finkle. I was born August 6, 1991.
2. Police first told us that we couldn't be in the street.
3. Then, police announced on the loudspeaker that we couldn't even be on the sidewalk. There were so many people that it was hard to hear what they were saying.
4. A woman invited us into her yard, and I ended up with a group of over 100 people on a private property on the corner of East and France. Since we had been ordered to not be on the sidewalk and advised we would be arrested if we were on the sidewalk, there was nothing to do but stay in the yard.
5. After 30 minutes to an hour, so at 7:30 pm, we saw lines of police in riot gear, and other officers in green with what looked to me to be automatic assault rifles, closing in on the house. We were on private property with permission of the

property owner, so I did not expect police to come onto the property and make arrests.

6. I had been standing next to the side of the house near a water spigot. As police approached the house people began running. I still did not think the police would enter the private property. I was moving backwards, not running, when I was tackled from the side by a police officer. I did not see him coming. He tackled me with excessive force, ripped my backpack off and threw it on the ground. He then took everything out of my pockets, which included a small notebook and two cell phones, and threw it on the grass. There was a water spigot that at this point was leaking a stream of water, so I was especially worried about my property.
7. I asked the officer multiple times to get my property. He refused and he also refused to answer any of the questions I asked him, including what I was being arrested for and what his name and badge number were. However, I saw on his uniform that his name was B. Jones from the Baton Rouge Police Department. He was a middle aged white man and his uniform was a brighter blue than other BRPD officers that I saw.
8. I was not read my Miranda rights or informed of why I was being arrested. I asked at least 4 different officers and none would go back for my property. One officer told me this was my fault for protesting. Several others told me this was city police's problem, not theirs.
9. When I entered the jail, before being booked, officers confiscated my glasses. This was extremely scary and disorienting for me. I am nearsighted and can barely see without my glasses and cannot recognize faces without my glasses if people are more than a few feet away.
10. When I was being printed and booked into jail I specifically asked them to tell me what my charges were. This is how I found out I was being charged with obstruction of a highway and resisting arrest.
11. From approximately 9pm until 3am we were kept in a holding cell. There were always at least 17 women in the small holding cell, a maximum of around 24. The cell had enough space for approximately 8-10 people to sit. There was not enough space for anyone to lie on the ground, people were sitting or curled up. At one point, a holding cell of men was maced and the spray drifted over into our cell and many women began coughing and experiencing burning in their eyes.
12. At certain points we were able to make some calls. The system was very confusing and difficult to navigate. One woman was able to call NLG to report our names and some folks were able to call their emergency contacts.
13. At approximately 3am we were given jail uniforms and put in general population. The protesters were put in different cell blocks. I was in cell block 1 with

approximately 10 other protesters. We were in bunks in a room with approximately 45 beds. Over the course of the time I was arrested I was strip searched in a group of 10-15 women two different times. They did this each time they made us re-enter the general population from the holding cells.

14. No one was given a pin number, which you needed to use the phones. There was mixed information from the guards about when/if we would be released and if/when we would be able to use phones.
15. The rooms were freezing cold. Everyone was almost immobilized with the cold. We were not given sheets, pillows, or socks. We were each given a single blanket, seemingly all of which had massive rips and holes.
16. There was no soap in the bathroom or toilet paper. We were not given towels or toothbrushes.
17. We were not fed until 5:15am the following morning.
18. I was released at approximately 8:30pm the following day, despite the fact that we had our bond hearing via videoconference with a judge at approximately 1:30pm. I was made to sign all paperwork and attend the bond hearing without my glasses despite multiple requests to have my glasses returned.
19. When my clothing and glasses were returned to me when I was released, I asked about the property that the officer who arrested me threw on the ground and left at the site of my arrest. I was told that was the city police's problem and I should ask there.

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

Executed on this 12th day of July 2016.

Signature

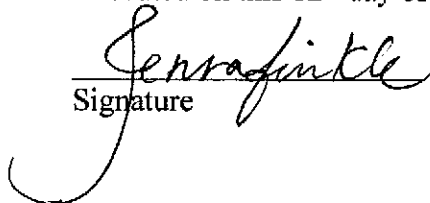
A handwritten signature in black ink, appearing to read "Jennifer", written over a horizontal line. The signature is cursive and extends below the line.

Exhibit R

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Plaintiffs,

-vs-

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Defendants.

CIVIL ACTION
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*Oral Argument
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DECLARATION OF COLLEEN HARRIGAN

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

1. My name is Colleen Harrigan. I was born on September 10, 1990. I am writing this declaration 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 my constitutional rights.
2. I am a resident of Orleans Parish.
3. I traveled to Baton Rouge, Louisiana on July 10, 2016 to participate in a peaceful march against police brutality and in protest of Alton Sterling's homicide. This march was youth-led. Participants included individuals of all ages and races. There were many families also at the event. It was beautiful to see so many parents with their children.
4. The youth-led march started around 4:30 pm. I participated in the march from 5:00 pm until its end. We

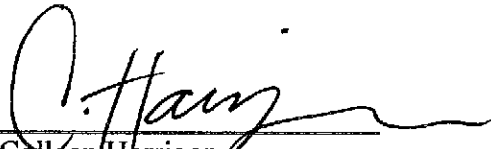
walked toward the Mississippi River on Government, turned right on St. Ferdinand Street, which then turned into Fourth Street. We took Fourth Street all the way to the Capitol Building.

5. When the march had returned back to its origin people began to disperse to go home , however there were so many police I could see them all the way to the horizon. The police had completely blocked the sidewalks road, and entrance to the highway.
6. I became scared with the amount of police and tried to leave the march even though I still wanted to exercise my First Amendment rights and speak out publicly and gather with others against police brutality and the wrongful killing of Mr. Alton Sterling.
7. The police officers did not let me get to my car. They corralled myself and others participating in the march. We were all walking on the sidewalk near the intersection of East Blvd. and Government when the police corralled us.
8. The police were completely blocking the sidewalk and the street. No one could come and go. No one could march and protest.
9. While people were gathered on the sidewalk, unable to leave or move freely on the sidewalk, I noticed a police officer put on a gas mask. There was no reason to put on a gas mask, because everyone was waiting patiently and peacefully for a way to leave. This occurred around 6:07 p.m.
10. More police came to the area where they had corralled and detained others and myself. The police totally blocked the sidewalk and street preventing us from continuing to march or leave if we wanted. I have attached a video documenting when more police came to the area where I was being detained by the police as Exhibit A.
11. The police surrounded us with rifles. I was terrified. I did not expect this type of behavior from the police toward citizens who were peacefully gathering and marching against violence.
12. The police then arrested a group of protesters who were all on the sidewalk. I have attached a photograph as Exhibit B that shows these arrested protestors. I took the photograph at about 6:50 p. on July 10, 2016.
13. I was able to get out of that area and back to my car. However, there were so many police officers blocking the street that I could not leave. I asked a police officer if he would let my car out and he told me that I needed to walk home. When I told him I lived in New Orleans, his response was that I would need to walk to New Orleans.
14. A pair of legal observers eventually was able to convince the police to let my car out so that I could return to New Orleans.
15. I have plans to return to future marches, vigils, protests and rallies in Baton Rouge against police brutality. But the behavior by the Defendants on July 10, 2016 has had a chilling effect on whether I will return. The police blocking the sidewalks and other public places, and their violence toward protesters in attempts to disperse them are deterring me from returning.
16. I do not believe in police violence and am upset by the homicide of Alton Sterling. I want to be able to lawfully express my concerns and opinions as guaranteed by the First Amendment of the United States Constitution. I also do not want to be illegally detained, searched and arrested like I was on July 10, 2016. Consequently, I am concerned that because of the political speech that I plan to express should I return, that I will be subject to such violations of my constitutional rights as described above by the named Defendants.

17. As such, I and the other plaintiffs would like to see this Court enjoin the Defendants from further activity that violates the public's right to free speech and lawful assembly.

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

Executed on this 12th day of July 2016.


Colleen Harrigan

CEH

