

Exhibit S

DECLARATION OF SANDRA HARRIS

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

1. My name is Sandra Harris. I was born on March 6, 1969, and I have lived in New Orleans, Louisiana my whole life. My son, Eric Harris, was shot and killed by police officers in Jefferson Parish, Louisiana, on February 8, 2016.
2. My family and I, including my children and my young grandchildren, went to the protests in Baton Rouge on July 10, 2016 to demand justice for the killing of my son.
3. We joined the march to the state Capitol. After that march ended, my family and I went to McDonald's near the protests for a bit. Then, we met up with people who had left the Capitol and continued to protest the police.
4. When we arrived, the protest was peaceful. There were police officers there, and they were letting the protesters gather and chant at them.
5. The police were wearing all black and face masks. They had a lot of armor on. I saw that the police had at least an armored truck, a regular truck, and a big vehicle for transporting people that they arrested.
6. Then, it seemed like all of a sudden, the police started yelling that we were going to jail, and people started running. I became really afraid for my little grandchildren.
7. I began to run away as fast as I could. I was crying and my nose was running. I was having trouble breathing, too. I have asthma and a heart condition, so it was very scary for me. It was so hard to run away when I couldn't breathe, but I was really afraid for my grandchildren. So I ran all the way back to McDonald's.
8. We went inside the McDonald's along with a lot of the crowd from the protest. When we were going through the door, I looked back, and the police had knocked down a white woman who was behind us trying to get into the McDonald's parking lot. They choked her and threw her into a police vehicle. It happened very quickly, and there was a group of police who snatched her. They were all wearing gas masks, but later on, I think I saw one of them take his gas mask off. He was a kind of short, white man. I think I got a good view of him.
9. We stayed at McDonald's for about two hours. It was about 8:30 when we left to go home. There were still so many police around the McDonald's, and we were really scared that they were going to arrest us. So we kept saying, "we just want to go to our car." We told them that we just wanted to go home, and, thankfully, they let us walk past them without being harassed.
10. It has been so hard for me since my son died. I cannot sleep because I see him in my dreams, and I am not eating well. It's not right that we cannot get justice for my son. That's why I protest. Every week, we hold a vigil in New Orleans for my son. Even though I am sick, and I feel weak and scared, I am still going to go out there every week.

S.H

11. But I am too afraid to return to Baton Rouge. I was so scared the entire time. We didn't come to get arrested. We didn't come to get killed. We just came to protest and to get justice for Eric. They treated us so badly.

12. It's not right that the police just started harassing us like that. I just want them to hurry up and arrest the officers that killed my son. We're just waiting for justice.

Executed on this 12th day of July 2016.

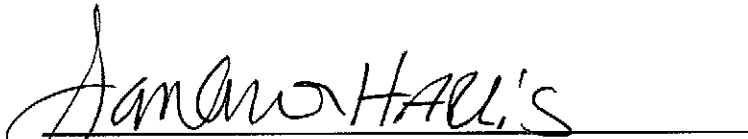

Sandra Harris

Exhibit T

I, Octavio Hingle-Webster
declare under penalty of perjury
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 21 years old.

The protestors were on the
side of the road. Most were
out of the road. Some were
in the street. The protestors
were on the woman's
property when police charged us.
I was linked up with
four women and police pulled
us apart.

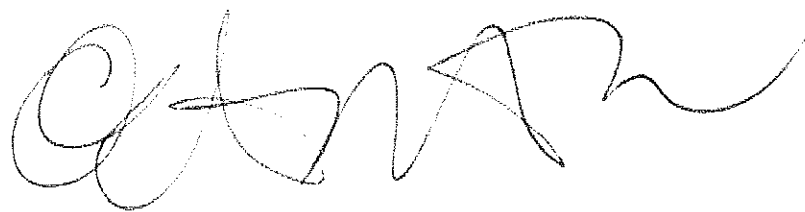
We were given a brief
warning to disperse but there
was nowhere to disperse.
We were taken ^{skinned} to the
ground. _(shw)

One man got a concussion.
Another got a twisted ankle.
The police had their batons out.
One police officer came into
the yard with a huge gun

There was a man in
a SWAT tank who gave
an obscene gesture.

They brought us to
a police station and gave
us our charges. My
charge was resisting arrest
but I was not resisting
because I was on the
ground.

The people whose property
we were on gave us
permission.



~~7/11/16~~ 7/11/16

Exhibit U

DECLARATION OF MAX GELLER

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

1. My name is Max Geller. My date of birth is January 2, 1984.
2. I went to Baton Rouge to protest the homicide of Alton Sterling and systemic police brutality experienced by people of color in the United States.
3. I was on the corner of France and Government Streets when the police and state troopers started marching down the street. We locked arms and a mass of police broke ranks and charged at us. I remember being overwhelmed by the cops who were swinging wildly at us. I then remember being dragged by the police, many of whom were on top of me and shouting, "stop resisting" to which I replied, "I'm not resisting. I'm just really scared."
4. It was really significant that pinning me to the ground in this way was exactly what happened to Alton Sterling, which is why we were protesting in the first place.
5. This pinning took place in front of the sound truck.
6. The police then dragged me behind the sound truck. Then, I remember a blow to my head with something hard and cold. I think it was the butt of a rifle, but I am not 100% sure. Then I blacked out.
7. The next thing I knew I was dragged around two corners to the main street. I was bleeding pretty badly and so the police called paramedics. The paramedic the police got seemed really invested in talking me out of going to the hospital. The paramedics would not give me advice or tell me if I had a concussion. Part of the paramedics trying to talk me out of going to the hospital was telling me that I did not need stitches, but I ended up needing two. It did not seem like they were neutral parties but part of the police apparatus.
8. I was transported to the hospital in an ambulance with a police car trailing behind us. Throughout my intake with doctors, two police officers were present and lingering. It made the process more stressful because I was trying to tell the doctors what happened so I could receive medical care, but the police kept interrupting me and saying that those things didn't happen. I was never told anything. I never even learned I was diagnosed with a concussion until I was released today because the doctors only communicated to the police and the police didn't communicate to me. I was handcuffed the whole time at the hospital including during my cat scan.
9. I was never told what I was arrested for. I never was mirandized. I didn't even find out my charges until I was released. I didn't even get finger printed or ID'd

until I was about to be released.

10. This made me fearful I was going to be lost in the system since that was such a different experience from that of the other people I was locked up with.
11. While in a holding cell, people were clapping for people getting released and the deputies responded by macing the entire holding cell. Never having an opportunity to know what I was charged with and not being made aware of what the booking process was or how long I would be held for but still strip searched and transferred into general population was terrifying.
12. I was scared that I wasn't in the system so I would not be able to get out. Three different times I asked to see a doctor because the overhead light in the cell was bothering me and making me more nauseous. I was denied every time. I didn't see a nurse until around noon of July 11, 2016.
13. There were also a number of gender queer people who were traumatized by the strip search, the gender of the people searching them, and which gender population they were put into. They had no say in any of this.
14. I have plans to return to future marches, vigils, protests and rallies in Baton Rouge against police brutality. But the behavior by the police on July 10, 2016 and my subsequent experience in the jail 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. I do not want to be beaten again, or subjected to the treatment I received while incarcerated after my arrest.
15. I am rightfully 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, beaten and arrested like I was on July 10, 2016.
16. 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 different law enforcement agencies in Baton Rouge.
17. As such, I would like to see this Court enjoin these agencies 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.



Max Geller

Exhibit V

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 TABITHA HUGHES

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

1. My name is Tabitha Hughes. I live in Baton Rouge. I marched in peaceful protests and saw police arrest people who were following orders and behaving peacefully. It looked like the police were trying to start everything; the protesters were the only ones working to stay peaceful.
2. On Friday, July 8, 2016, between 8 and 9 p.m., I went to the gas station near Goodwin Boulevard and Airline Highway. People were preparing to march. The police ordered us to stay on the grass or the sidewalk, but because of the large crowds it was easy for you to make a mistake and step into the street. Police were waiting for you to step into the street by accident and grabbed you when you did.

3. In front of the gas station, I saw one black woman in her late twenties or early thirties step just barely into the street to move around a crowd of people; police pulled this woman's arm around her back and arrested her.
4. I saw a white man get arrested while he was sitting on the grass by the gas station, doing nothing. Police just walked up to him, even though he was sitting on the grass, and arrested him.
5. I left before the march started, because I didn't want to get arrested.
6. On Saturday July 9, 2016, a little after 9 p.m., I came back to Airline Highway at Goodwood Boulevard to march. We walked on the pavement at first because we didn't know that we had to walk on the grass. We were very calm, but the police were very nasty and talked to us like robots.
7. The police started yelling "Get on the grass! Get on the grass!" We started moving towards the grass, but less than a minute after they told us to move on the grass, police grabbed a white man in front of me from behind, surprising him, and threw him to the ground. He didn't even have time to move over.
8. Around this time I heard that my daughter, Yakeista Hughes, had been arrested.
9. People started running and saying that they might teargas us. I didn't feel like I should have to run, so I walked. I got back into my car. A news reporter who was parked near me told me to roll up my windows because I had children in the car and they might teargas us. I was scared, so I left.

Executed on this 12th day of July 2016.


Tabatha Hughes

Exhibit W

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 YAKEISTA HUGHES

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

1. My name is Yakeista Hughes. I am sixteen years old.
2. At around 9 p.m. on Saturday, July 9, 2016, I went to the intersection of Goodwin Boulevard and Airline Highway to march in protest. I walked with three people who I did not know well, one of whom was named Coco.
3. We were walking on the grass towards I-12. As we walked, we heard police say "we should just grab them now."

4. Coco began speaking with three police officers: a short white male with a hat on, and two taller black men. The short white officer was extremely antagonistic, getting in our faces and yelling: "Go home, y'all don't know what you're protesting for, we should just grab them." Another officer who was older and in a different colored shirt told the short white officer to back off, saying, "Y'all shouldn't be talking to them."
5. Later, as we walked down the grass on Airline Highway, Coco and I became separated because I was looking for my cousin. Near the bowling alley on Airline, I heard police yell "1, 2, 3, let's get them!" The fifteen to twenty police who were standing in the middle of Airline charged the protestors standing on the grass, grabbing anybody they could, dragging them onto the highway, and arresting them. Repeatedly, I heard police yell: "Grab anybody you can get." All the protestors who I saw arrested had been standing on the grass.
6. I watched them arrest a young, light-skinned woman named Jordan. Jordan had stopped running to help up an old man who had fallen down. Two or three police officers grabbed Jordan by both arms and threw her onto the ground. Jordan still has bruises on her left arm.
7. I also saw police grab a Black man with a beard and drag him towards the pavement. As police did this, that man's wife, whose name is Irene Johnson, grabbed onto her husband. Police arrested both of them on the grass though they hadn't done anything.
8. I started running on the grass and then I ran back across the street. The short white police officer with the hat from earlier came up and said, "You're the one I've been looking for." He yelled, "Let's fight, let's go, this is what y'all wanted, lets fight," and raised his arms as though to fight. He didn't try to arrest or stop me, but seemed like he was trying to provoke me to fight him. I said, "I'm just out here looking for my cousin. He has autism, I don't want him out here by himself."
9. The short white officer grabbed my shirt and by my shirt slung me onto the ground. A tall black male officer approached and pinned me with his knee to my back. The short white officer grabbed me by my hair and began dragging me across the grass by my hair while the other officer still pinned me with his knee to my back. Still holding me by my hair, he began repeatedly picking my head up and pounding it into the ground. I still have grass in my hair. A third officer pinned my arms down.
10. At no point did I resist or try to resist. The second officer picked me to my feet. I asked the short white officer for his name and badge number. This man covered his badge with his forearm, and said "I'm not giving that bitch anything. I don't have to give you shit. Get her out of here." He then asked about Coco, "Where your friend at cause I want her too?" He kept calling me a bitch. The tall black officer then took me to the bus.

11. While on the way to the bus, we walked through a group of police officers. A tall, white police officer approached and asked me, "Do you see that guy over there?" He repeated the question several times; I ignored him. Finally, I asked "What guy?" He responded, "These nuts," pointing to his crotch. The crowd of police laughed. This is a popular sexual joke here.
12. On the bus, I joined 38 other arrestees (I heard police count them). We heard an order over the police radio: "I don't care what they're doing... grab as many as you can. I don't care if they're on the grass or not." We began talking about the order, but the guard realized that we had heard it and turned the radio off.
13. I waited on the bus for 1 ½ hours. In front of me sat a man whose hands were swelling up because the zip ties were too tight. He asked for them to be loosened, but was refused. A diabetic woman asked for water or a peppermint, but she was also told no.
14. We were brought to the police station that is located on Airline at a former women's hospital. While we were being processed, the diabetic woman, who was crying, requested immediate food, saying that she needed it fast. Finally, a police officer brought her a handful of cookie crumbs crumpled up in his hand.
15. I also saw police harass a white man in his late 20s or early 30s who had told me that he was a librarian at Tulane University. A tall, white police officer with dark blond hair in a Mohawk haircut told him: "I can tell what type of person you is; why are you out here with *them*?" I guess he was mad because the man was white and with us. The officer snatched papers from this librarian's hands very aggressively, lifted him, pushed him down, and moved him around very roughly.
16. At one point I asked, "How many people are going to be killed before we wake up?" In a low voice so that the other police officers couldn't hear, the officer in the Mohawk said to me, "As many as needed." He always made eye contact with me, looking very threatening. He kept eye contact with me as I was taken away, like he wanted to do something to me.
17. At no point during this evening was I read my rights, photographed, or fingerprinted. This process took 3-4 hours.
18. I was taken downtown and put in a cell. We -- I think that there were more than 30 -- were given no toilet paper or supplies, except for one blanket each. There were not enough beds. We were served food that was undercooked. The chicken bled, and the hotdog seemed close to raw. I didn't eat anything.
19. One officer was very nice to us, but the others were nasty and ignored our questions. Irene Johnson -- the woman who had been arrested with her husband -- complained to guards that she was having a gout attack in her arm and asked for the medication in her bag. The guards refused; they also assigned her to a top bunk that she couldn't get into.

20. The inmates who had been arrested before for other stuff said that since the protests had started, the air conditioning had been set to an uncomfortably cold temperature that made it uncomfortable and difficult to sleep, and they had been refused visitors, regular meals, or regular medication.
21. Sunday night, my fingerprints and picture were finally taken. The man taking my fingerprints and photograph told me that we could have all been released on Sunday, but the judge posting bonds on Saturday night only posted bond for five people before saying, "I'm not doing this shit right now" and leaving to go to church. The officer explained that they had all been waiting for this judge to post bond. At around 9 p.m. Sunday night, I was released.

Executed on this 12th day of July 2016.



Yakeista Hughes

Exhibit X

DECLARATION OF CHARLES JOYNER

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

1. My name is Charles Joyner. I was born on March 2, 1987.
2. I attended the marches and protests in Baton Rouge on July 10, 2016.
3. I am a member of Stand with Dignity, an organization that organizes structurally unemployed and criminalized black community in New Orleans, Louisiana. I attended the protests with Stand with Dignity and was wearing a t-shirt from this group. I also wore a green vest identifying me as a marshal. As a marshal, I was trying to coordinate between the protesters and police. At some point during the protest, my vest fell off.
4. The march to the Capitol was perfect. The police were in their regular uniforms, and even as we were leaving the Capitol, police were still very calm.
5. A group of people from the Capitol gathered by a church after the march. Then, after about a half an hour to an hour, we started marching again together. Some people tried to get into the street, but we told them to get on the sidewalk. And we all stayed on the sidewalk as the sheriff car tried to restart traffic.
6. We started moving further down the street, chanting, and we got back into the street. Then, we ran into some police in tactical gear.
7. I don't know Baton Rouge very well, but I guess we were near the freeway, and the police wanted to stop us from getting on there. They said that they didn't want us on the interstate, and that we couldn't block the streets.
8. At this point, people started getting more agitated. They weren't happy that the police were stopping our march. The police were also in riot gear, and that upset people too.
9. Then the police were on one side of the street and the protesters were on the other side. I was watching the police, and it looked like they were getting ready to do something. I wasn't with the protesters that were in the lady's yard. Instead, I was across the street from them.
10. As the protest continued and people were chanting, I kept noticing the police getting more and more tactical gear on. They added gas masks and shields. They also had more guarding their arms.

CJ

11. At one point my eyes started to water. And people started to disperse. That's when it started getting scary.
12. The police started saying that it was no longer a sanctioned protest and that we had to disperse. At the same time, they started closing in.
13. They had a truck with a large blowhorn that made a loud siren noise.
14. People that were trying to disperse and leave could only go one way. It didn't make sense because they told people to go home, but they made it really hard for people to go home. They pushed people into the street.
15. As this was happening, I looked over, and one police officer was laughing. That made me really angry. There were children out there, and the situation was not even close to funny. If it were his relatives out there, I don't think he would find the situation as funny.
16. When the police crossed the street after telling people to leave, they arrested a lot of people. They did it really fast. They just ran across the street, grabbed people, and arrested them. I didn't see the people who were arrested do anything wrong. They were just protesting.
17. I saw about three or four people get arrested. One was a black man. As I was looking at that, I saw police officers on top of a woman, arresting her too.
18. It was a great protest. It was peaceful, and there were lots of people out. The problems began when the police stopped us from marching.
19. I came out to protest because of the video of Alton Sterling's killing. He wasn't doing anything wrong. He was just asking why he was being arrested. Anyone being arrested wants to know why. It wasn't right for the officer to even take out his gun, and to kill him was just wrong.
20. This situation was scary. It is scary to know that the police can use such force and get away with it. We pay for their equipment, and they shouldn't be able to use it on us like they did.
21. I'm still going to protest. We have the right to march, and we have the right to speak out.

Executed on this 12th day of July 2016.


Charles Joyner