

# **Exhibit Y**

**DECLARATION  
STATE OF LOUISIANA  
PARISH OF ORLEANS**

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

1. My name is Sophie Kosofsky. I was born on Decemeber 26, 1983. I am writing this statement 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 Sunday 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 4:00 pm at a church on Government St. I participated in the entirety of the march. We walked toward the Mississippi River, turned right on St. Ferdinand Street, which then turned into Fourth Street. We took Fourth Street all the way to the Capitol Building. The demonstration was incredibly inspiring, peaceful, and moving. There was a police presence blocking the streets to and from the Capitol, allowing for us to march.
5. As we got back to the church, a decision was made by the group to continue marching. We understood that this was outside of our permitted march and that there may be a risk, but with the large presence of peaceful protestors and we felt safe.
6. We began marching on Government St. The police then blocked our path from Government, and corralled us to make a right on to France St.
7. Once we were on France St., demonstrators began to discuss what our next step would be and where to march to next. As we had these conversations, more and more police showed up. Police began to physically block people and streets, and made it impossible for us to continue on our route.
8. The police were completely blocking the sidewalk and the street. No one could come and go. No one could march and protest
9. I saw police begin to edge in on East St. Police with gas masks, armored vehicles, sound bombs, and a SWAT team began making their way towards us on this narrow street. As we saw the resistance from the police and the militarized gear of the authorities, we realized that we were in danger.
10. Police kept saying they would arrest people if they were in the streets. Demonstrators were quick to comply with those orders, and moved to sidewalks and lawns. Despite compliance, police kept inching closer and closer to us and threatening to arrest. The police kept saying that we weren't allowed to be in the street and we weren't allowed to block public passages, though they did not indicate what "public passage" meant.
11. Police kept pushing forward. It got scary, because we were in a place we were told we were allowed to be. Then, a police line comprised of an armored vehicle, SWAT, and riot police began marching towards us.

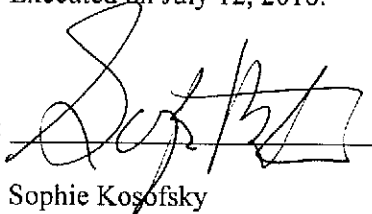
12. Once they started moving in, some other participants and I linked arms and stood in front of the armored vehicle and police line to protect more vulnerable protestors, as it was clear we were in danger. We formed a line and chanted, "We are unarmed. Put the guns down". We asked them to approach us peacefully. They kept pushing forward and saying "we will arrest you if you don't clear the street". They then started arresting people in that line.
13. My friend, Max Geller, and I were linked arms. They pulled Max out of the line, body slammed him to the streets. A very large officer slammed his whole body weight from his knee into Max's skull. I watched that happen. I thought that they crushed his skull. They started hitting him and beating him. I was standing shocked in the streets screaming, "let them go let them go". At this point my friend Bob Weisz grabbed me and pulled me up on to the grass. We were trying to find out other friends who were in line with us. We tried to locate them and saw them being carried away.
14. A woman who lived at a home on France St. invited us to stand on her lawn and seek refuge on her property. People in the yard began chanting and shouting to police, "No justice no peace", "Alton Sterling" and "Philando Castille". This felt like a standoff. The police were holding their ground across France St., where they had just arrested our comrades. We were holding our ground – in the grass, on the sidewalk, and in the parking lot in the building behind the house. This standoff went on for about 40-45 minutes.
15. I started to notice lines of riot police setting up on the edge of France St. I saw them setting up from various angles. It seemed as though we were getting blocked in by police. We didn't know where we were supposed to go. .
16. Then the police started saying we weren't allowed to be where we were (on the yard). They kept moving forward towards us until they got to the edge of the yard. They then came into the yard. People started trying to leave the yard. The police said "You're not allowed to be here. We will start arresting you". We were confused because this was private property that we had permission to be on. The Police started to block off all exits from the lawn. We had no idea where to go or what to do.
17. Then the riot police crossed into the yard and began arresting people. I started walking towards police who were targeting protestors I rode up with. I and a few others tried to make a protective line in front of more vulnerable protestors so they could attempt to funnel through the back. At that point they grabbed me. Two officers grabbed me and threw me on the ground.
18. They carried me out and handed me to an officer on Government St, who cuffed me with zipties. He put the cuffs on incredibly forcefully and tightened them to an extreme. I told officers my cuffs were too tight and they ignored what I said and told me they'd loosen up eventually.
19. The officers then began to line up arrested protestors on the side of the road as they began to fill out our paperwork. I asked multiple officers "why am I being arrested?" and they all refused answer. While we were sitting on the sidewalk and they were taking our information people kept asking "why am I being detained?", they all responded "I don't know, I wasn't there" "What am I being charged with?" The officers' answers were consistent: "I don't know, I wasn't there".
20. Officers refused to share names and badge numbers. I saw that their first initial and last name were embroidered on their shirt, but did not see any badges. Police would laugh and mock when we would ask for their names and badge numbers. They would refuse to give us information. They'd say "you're so stupid, that's not how this works".
21. There was a mother and daughter arrested and waiting on the side of the road with me. The mother wanted to take a photo of her 17 year old daughter protesting, as is her right. As her daughter stepped into the street to be photographed, the police arrested the 17 year old. The mother began running after

her. The police arrested the mother. The mom kept pleading with them to let her go, stating “my son is in the car. My dog is in the car!” They told her they were going to charge her with neglect. The mother was just pleading with the officer to drop the charges, to let her be with her son, etc. An officer eventually whispered in her ear “fine, I’ll reduce it to a misdemeanor”

22. The police refused to answer any questions. The force itself seemed very disorganized and overwhelmed. It did not seem as though all the officers understood or were able to follow protocol. A couple of people were read their Miranda rights as they were arrested, I was not. Many people weren’t read their rights.
23. Officers were handing out water to each other, refused to hand it to us. It took around two hours before we were able to drink any water.
24. After all this, I am now aware of the incredibly high risk of protesting. I was definitely afraid. In retrospect, I realize it could have gotten a lot worse. It could have escalated even more, as the police were armed and prepared for a riot.
25. 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. It’s appalling to me that we’re not allowed to do this [peacefully protest] in America. To see that amount of resistance to a group of peaceful people advocating for peace and the end of police brutality was unbelievable.
26. I feel extreme compassion for police. That’s a crazy job they have, and the chaos of their own organization was clear to me. I saw extreme comradery amongst them – they do crazy, dangerous work, all the time. I don’t hate police officers. I hate what happened, and I hate the directions they had to follow.
27. 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.
28. 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.
29. I declare under penalty of perjury, that the foregoing is true and correct.

Executed on July 12, 2016.

Signed:



Sophie Kosofsky

# **Exhibit Z**

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**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 TARANA LAWRENCE**

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

1. My name is Tarana Lawrence. My date of birth is March 15, 1975.
2. I am a member of the National Lawyers Guild. I am trained in legal observing and have conducted legal observing training.
3. I attended a protest in downtown Baton Rouge on Sunday July 10, 2016.
4. My legal observing partner was Andrew McDaniel of the Southern Poverty Law Center. He and I were standing near a parking lot on the corner of Government and East Street.
5. We were writing in our notebooks, and we saw Michael Martin, a redhead man in a tie dye shirt, standing on the sidewalk, getting handcuffed by police. He was not provoking officers at all, so we do not know why he was arrested. He was standing on the sidewalk, so he was not obstructing traffic. Up until the point, the protests had been completely peaceful.

6. There were Baton Rouge city police, state police, and sheriff's police present at the protest.
7. Andrew started recording Michael Martin's arrest. Another police officer came from behind Andrew and arrested him. Andrew was also standing on the sidewalk. The officer would not tell either of us why Andrew was being arrested.
8. We were still standing at the corner of Government and East Street. The police told the crowd "you cannot leave. If you try to step into the street, we will arrest you."
9. There were a couple of girls (black) who wanted to leave. Suddenly, one officer approached us individually and volunteered to escort them who wanted to leave. We asked whether they would announce that this was an option for other people who wanted to leave, but there was no response.
10. The officers were speaking to us through their gas masks, so it was very difficult to understand what they were saying.
11. There was another group of girls (white girls) who were in their car and were stuck. The police told them that they "could walk home to New Orleans." Only after about forty five minutes of negotiation did the police finally allow them to pass in their vehicle.
12. No one else was trying to leave after that.
13. We heard a high level officer saying that "there are rocks behind thrown," but we saw absolutely nothing being thrown.
14. I feel like they were targeting folks. We heard them saying "guy in the beanie cap" and "guy in the black shirt." They were picking and choosing who they wanted to arrest.
15. I plan to continue legal observing.
16. I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this 12th day of July 2016.

  
Tarana Lawrence

# **Exhibit AA**



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

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.

DECLARATION OF ALISSA LUIS

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

1. My name is Alissa Luis. My date of birth is 07/22/1984.
2. I attended a protest in downtown Baton Rouge on Sunday July 10, 2016. I attended as a trained Legal Observer for the National Lawyers Guild. To identify myself as a Legal Observer, I wore a bright green National Lawyers Guild hat.
3. I was stationed at the northeastern corner of East Blvd. and Government St. When I arrived at the scene I saw Sheriff's officers in full riot gear, including shields and night sticks. They had automatic weapons and were wearing armor. I saw them put on gas mask bags. I saw at least two rifles with non-lethal weapons and two crowd-control sirens. Many officers were wearing riot gear and had their names taped over, so I could not identify who they were. Officers from the Baton Rouge Police Department, East

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Baton Rouge Parish Sheriff's Office and the Louisiana State Police were present at the scene.

4. I also saw two armored vehicles with law enforcement posted out of the turret with automatic weapons. One was from the East Baton Rouge Sheriff's Office and one was from the Baton Rouge Police Department.
5. I observed the protesters acting in a peaceful and non-violent manner. I did not witness provocation of any law enforcement officer by any of the protesters.
6. I was standing on the sidewalk on the northeast corner of Government Street and East Blvd., and I was not obstructing traffic. Protesters were standing on the west side of East Blvd. south of Government St. Some protesters were standing on the median between the north and southbound lanes on East Blvd. When I arrived at my post, protesters were standing on the sidewalk and in the street. I observed the protesters clear the street and move to either side of East Blvd. once asked by law enforcement.
7. I observed protesters acting in a peaceful and nonviolent manner, though many expressed anger, frustration and agitation toward the police verbally and through hand gestures. I observed the protesters remain peaceful and confident while standing and chanting on the side of East Blvd. The mood of the crowd and law enforcement changed noticeably when East Baton Rouge Parish Sheriff's officers marched westward on Government toward the protesters.
8. The East Baton Rouge Sheriff's Officers were dressed in riot gear consisting of shields, helmets with visors, batons, armor and automatic weapons. Once these officers were in view of the protesters, I observed many protesters becoming fearful and attempting to disperse. I heard many screams and chaotic noises from the general direction of the protesters that sounded fearful. From my vantage point, it was clear that the protesters were acting in a peaceful manner until armored law enforcement officers began to approach.
9. I witnessed these events while standing on the sidewalk. Officers located on my side of Government St. asked onlookers to remain on the sidewalk and I complied.
10. I heard law enforcement officers tell bystanders that they would be arrested if they stepped into the road near where I was standing.
11. From my post, I observed protesters standing on the porch of the private residence located on the southwest corner of East Blvd. and France St. I was too far away to hear the owner of this property give permission for the protesters to be there, but I believe this

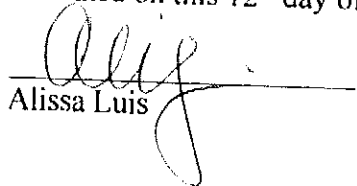
to be the case. However, I have video of the homeowner stating that she gave protesters permission to occupy her property. This video was collected after the protest had dispersed from East Blvd.

12. During the protest, law enforcement (I am unclear as to which agency) asked protesters to clear the roadway on East Blvd. I observed protesters move to the side of the road once this request was made. Protesters did not appear to be obstructing the roadway on East Blvd., though no cars were able to pass as law enforcement vehicles were parked in the intersection on East Blvd. and Government St.
13. I heard law enforcement officers tell protesters over a public address system that they would be arrested if they did not disperse from the area on East Blvd.
14. I saw law enforcement officers advance on the protesters from east, south and north sides on East Blvd. I heard from bystanders in the crowd near me that protesters were being arrested as they dispersed westbound on France St. I believe that many protesters did not disperse for fear that they would be arrested as they left the area westbound on France St. Protesters were unable to disperse to the north, east or south on East Blvd. due to advancing law enforcement lines.
15. I saw Sheriff's officers in riot gear advance at the choke point on East Blvd. and France St. They entered private property uninvited without a search warrant. I have video of the homeowner stating that she did not invite them in and that they did not have a warrant.
16. I heard law enforcement state "This is no longer a lawful assembly" over a public address system. I am unclear as to which law enforcement agency made this announcement.
17. I witnessed the arrests of many protesters. Too many, in fact, to have counted. I witnessed protesters being arrested in the yard of the private residence on the southwest corner of East Blvd. and France St., on the sidewalk on the west side of East St., and being dragged from the private property into the street. During these arrests, protesters were not blocking the roadway.
18. I also observed a group of 12 arrestees being held on the south side of Government St. between East St. and I-10. In this group, one of the arrestees was bleeding profusely from the left side of his head. I was able to discern the bleeding this from my post on the corner of Government St. and East Blvd. approximately 100 feet away. He was treated by a medic briefly, who appeared to clean his wound. I observed the protester talking to officers multiple times after the medic treated him, and I observed him turn his head toward the officers. It appeared as if he was continuing to show the officers the wound on his head.

19. I observed multiple officers tackle, hit and hold down one protester who ran from the crowd across East Blvd. I observed several officers tackle and hold down two protesters on the corner of Government St. and Maximillian St., approximately five officers per person. I observed hordes of officers tackle, grab, pull and throw down several protesters on East Blvd. I witnessed several officers sitting and kneeling on protesters backs, necks and heads during the arrests on East Blvd. after these protesters were seen to be complying with their arrests. I witnessed many with hands held in the air being thrown to the ground. I believe the actions of the majority of law enforcement officers during the arrests of July 10<sup>th</sup> were excessively forceful, intimidating, and escalating in nature.
20. I saw at least four law enforcement officers carrying automatic weapons. I am unfamiliar with what type of weapon they were carrying, though they were similar to the type used by the military.
21. Based on my first hand observations, I believe that law enforcement attempted to stop and disperse a peaceful protest through intimidation and direct use of force on non-violent individuals. I believe that the use of militarized weapons, displays of power (such as beating shields with batons), distributing gas masks to officers, and cornering protesters were methods by which law enforcement attempted to scare protesters and persuade them to leave an otherwise peaceful demonstration.
22. I became fearful of the police as they began marching in formation toward the protesters on East Blvd., though I did not leave my post. I did not participate in the protest per my duties as a legal observer, though I was afraid that I too may become a victim of police violence if I performed my duties from a post closer to where the arrests were occurring. I was too fearful to perform my duties at a location closer to where the arrests took place, as it appeared that arrests were occurring indiscriminately and without cause.
23. I had planned to protest in upcoming marches, though will likely not do so in the future. I have been dissuaded by the reports of arrested protesters whose statements I collected upon their release from East Baton Rouge Parish Prison as part of my duties as a legal observer.

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

Executed on this 12<sup>th</sup> day of July 2016.

  
Alissa Luis

# **Exhibit BB**

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

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

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 ALISON MCCRARY

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

1. My name is Alison Renee McCrary. My date of birth is February 20, 1982.
2. I was at the protests on July 10, 2016 in Baton Rouge, Louisiana.
3. I am the President of the Louisiana Chapter of the National Lawyers Guild, a Bar association that is the nation's oldest and most extensive network of public interest attorneys.
4. I am a Catholic nun with the Sisters for Christian Community.
5. I serve on the National Leadership Team of the Association for Conflict Resolution's Community Mediation Section. My area of professional expertise is in community and police relationships.
6. I am a licensed attorney in the state of Louisiana.

7. I am a certified mediator and community-police mediator trainer. I have assisted in setting up community-police mediation programs in New Orleans, Louisiana, St.Louis/Ferguson, Missouri, Baltimore, Maryland, and several other cities.
8. I have trained more than 300 attorneys, law students, and legal workers as Legal Observers with the National Lawyers Guild.
9. I have more twelve years of experience in human rights and civil rights work.
10. On Friday, July 8, 2016, approximately 31 protesters were arrested during peaceful non-violent demonstration.
11. On Saturday, July 9, 2016, approximately 106 protesters were arrested during peaceful non-violent demonstration.
12. On Sunday July 10, 2016, approximately 80 protesters were arrested during peaceful non-violent demonstration.
13. During this weekend of protests, I observed Louisiana State Police troopers, East Baton Rouge Sheriffs, and Baton Rouge Police Officers. I identified them by their badges, uniform color, names on their police uniforms, and their vehicles.
14. I have multiple individual names of law enforcement officers of various ranks who were engaged in police misconduct.
15. I have photographs and video that I took of what I saw during the protests.
16. I saw the officers pointing nearly one hundred military-grade assault rifles at protesters with their fingers on the trigger and aiming it directly at protesters within a very close proximity. I have pictures and videos of this.
17. I saw officers uniformed in full riot gear with gas masks, riot shields, tactical vests, assault rifles, and riot helmets.
18. I saw officers use tear gas, batons, and rubber bullets on demonstrators.
19. I saw officers tackle many peaceful protesters who were walking to their cars on the sidewalk. Many were women.
20. I saw a group of officers tackle a Muslim woman, pull off her hijab head scarf, and arrest her.
21. I saw the officers target people of color.
22. Upon arrival on Sunday July 10, 2016 around 2pm, the gathering of protesters was peaceful and protesters engaged in a permitted march from a church to the

capital building. The protesters were peaceful the entire day. I did not see one protester engage in an act of violence or throw anything. I was present from 2pm-9pm on the streets watching the police and demonstrators.

23. I was standing on the sidewalk the entire time unless police has the sidewalk blocked or had the street blocked so people could not be lawfully in the street.
24. Protesters were not obstructing traffic during all the times that I saw them. The police cars and police lines were obstructing traffic.
25. All of the law enforcement agencies present escalated the interactions when they marched in military style several deep in rows and in sync with assault rifles pointed at protesters.
26. I fully complied with any orders given to me by law enforcement about where I should stand even when it endangered my physical body.
27. One officer grabbed my arm and shoved me into a group of about 20 media representatives and journalists.
28. Upon request from demonstrators and professionals, during a more than one hour standoff between more than 100 police officers and hundreds of demonstrators who were standing on the sidewalk, I approached law enforcement to invite them into negotiations.
29. When I entered, the standoff had been at a standstill for at least 30 minutes. I walked down East Blvd. directly in between dozens of Louisiana State Patrol Officers and Baton Rouge Police Officers and hundreds of demonstrators.
30. Nearly all of the uniformed law enforcement were white men.
31. I first approached the group of demonstrators, introduced myself as a professional negotiator and attorney, and asked them what they want. All responded that they would like to continue to peacefully demonstrate and march on the sidewalk.
32. I then approached the supervisors of the law enforcement agencies, introduced myself as a professional negotiator and attorney, and asked what they wanted. They said they wanted protesters to leave.
33. There was no place for the protesters to disperse to.
34. Any demonstrator who moved during the more than 90 minute standoff was violently attacked and arrested. Some were dragged across the cement. Others had clothes ripped off of them.



35. During the standoff, I was standing in between media representatives and the police on the sidewalk out of fear for my own safety since law enforcement had guns pointing in every direction except their own. I complied with every request given to me by law enforcement about where I should stand and they asked me to move to different places multiple times. There was no safe place for me to go.
36. I asked Major Cain and Sergeant D. Coppola of the Baton Rouge Police Department five times each if they would be willing to negotiate a compromise. They repeatedly said no.
37. I also asked other ranking officers of the Louisiana State Police and Baton Rouge Police if they would be willing to negotiate a compromise. They repeatedly said no.
38. The police repeatedly told me that the police were being peaceful when in fact the police were being very violent throwing people on the ground, charging after demonstrators, and pointing dozens of assault weapons at protesters when their fingers on the triggers.
39. I asked Sergeant D. Coppola to help me understand the level of force being used against demonstrators. He told me that one demonstrators threw a rock at the police. When he told me that, people around me including journalists and Legal Observers loudly declared "no one has thrown any rock."
40. On Monday July 11, 2016, a Legal Observer who was trapped in the female resident's lawn with no place to exit shared a written statement with me stating that he saw a white man in street clothes who looked out of place walk into the crowd of African-American demonstrators and throw a piece of rock that landed near the foot of another white man in street clothes across the street. They both looked up at each other and when the Legal Observer turned around to look for the man who threw the rock, he had left immediately. The Legal Observer told me that he believed the man was a law enforcement officer in plain clothes.
41. During the Sunday standoff, the demonstrators were chanting "the world is watching" on the sidewalk. None of the demonstrators were in a street or blocking traffic.
42. Law enforcement had protesters surrounded in four directions with no place to disperse to.
43. A speaker seemingly placed on or near a hostage negotiation tank parked in a resident's driveway could faintly be heard but not understood from me about 30 feet away. Demonstrators were about three to four times my distance away from the speaker.
44. A man who tried to leave going down France Street was arrested.

45. East Blvd. was blocked off with multiple police vehicles and heavily armed officers.
46. Many protesters were cornered onto a female resident's lawn on the 600 block of East Blvd. I heard her say after the standoff that she gave them permission to be on her lawn.
47. Protesters were stuck on her lawn for a long period of time while assault rifles were pointed at them. Demonstrators were not able to leave without face physical violence from police and/or being arrested.
48. I felt trapped and like I could not leave without being shot at or violently arrested. I feared for my safety.
49. Fearing for my life and others' lives, I called 911 to report what I saw happening as an immediate threat to life and also asked for an ambulance to come to provide medical care to anyone who may be injured since it looked and felt like events were going to escalate as police were drawing their weapons and a line of several Sheriffs started marching down East Blvd. toward the demonstrators.
50. I saw the police walk up the resident's lawn and pull a white person, then a Black person, then three white females, one Black female, another white female, one Black male, two white females, and multiple others off the lawn and arrest them.
51. The East Baton Rouge SWAT team charged at demonstrators as they came down East Blvd. from Government Street toward France Street.
52. Multiple weapons were used on demonstrators and so many law enforcement were there that it blocked my and others' views including all the media.
53. Louisiana State Police and Baton Rouge Police charged at demonstrators pushing them onto the resident's porch and into her home.
54. There were clear injuries to demonstrators and I did not see anyone treated by a medic. Some people were limping and other had visible scratches.
55. I saw excessive use of force used as officers used their fists to beat people down, jump on top of demonstrators, and hit demonstrators with their weapons. I saw multiple police officers tackle individuals by simultaneously jumping on top of one person at a time. I saw multiple tackles.
56. Military-grade assault rifles or AK-47s were pointed at demonstrators heads as officers had their fingers on the trigger.

57. I think the police were trying to shut down the protest to deter people from protesting again. The police were clearly using excessive use of force on non-violent peaceful demonstrators.
58. I was afraid that I would be shot at and that a bloody massacre would happen. I felt trapped with nowhere to go and no choice except to be arrested or be physically tackled to the ground and violently harmed.
59. After the police charged at the woman's house on the 600 block of East Blvd., I walked up East Blvd. to Government Street. I was fearful for my life and scared with every next step that I took as guns were pointed at everyone including me.
60. On Government Street, the East Baton Rouge Sheriffs held us at gun point with them on one side of the street in a multiple-layer thick police line in full SWAT and riot gear and about 100 demonstrators stuck on the other side.
61. I watched demonstrators go to their cars to leave the sidewalk as ordered and be tackled to the ground and violently arrested. The use of force was unnecessary and extreme. No one resisted arrest or fought back.
62. I was scared to try to go to my car. We were at yet another standoff but with the Sheriff's SWAT team. After calling multiple times to the Department of Justice, parish attorney, and others, the Sheriff's SWAT team marched down Government Street and left. This was after dozens of people were arrested and injured by the police.
63. I am terrified to try to negotiate with the police again in Baton Rouge.
64. I am scared to serve as a Legal Observer in Baton Rouge.
65. I do not feel comfortable training Legal Observers and placing them in harm's way in Baton Rouge with the police misconduct, excessive use of force, and constitutional rights violations that I observed.
66. If the event on Sunday July 10, 2016 did not occur, I would no longer hesitate to continue training Legal Observers to protect peoples' First Amendment Rights.
67. On the day after the Sunday standoff, on July 11, 2016, no protests or demonstrations took place despite four days of previous consistent protests. I feel that my and other demonstrators' speech was chilled because of this event.

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

Executed on this 12 day of July 2016.

