

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BLACK LIVES MATTER SEATTLE-
KING COUNTY, ABIE EKENEZAR,
SHARON SAKAMOTO, MURACO
KYASHNA-TOCHA, ALEXANDER
WOLDEAB, NATHALIE GRAHAM,
AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE ,

Defendant.

No. 2:20-cv-00887-RAJ

DECLARATION OF ALEXANDER
WOLDEAB IN SUPPORT OF MOTION
FOR TEMPORARY RESTRAINING
ORDER

I, Alexander Woldeab, declare and state as follows:

1. I am a videographer and graphic designer residing in Seattle, Washington and I protested every day between May 30, 2020 and June 7, 2020. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a twenty-eight-year-old black man and between Saturday, May 30, 2020 and Sunday, June 7, 2020 I was personally exposed to police violence for the first time in the form of tear gas, pepper spray, and flash bangs while peacefully protesting.

1 3. On Saturday, May 30, I participated in protests in Seattle’s Westlake Park where
2 police used tear gas and flash bangs. My partner and I arrived at Westlake Park around 3:00
3 p.m. to attend the peaceful protest organized by Andre Taylor and his organization Not This
4 Time. Around 3:45 p.m. we began hearing loud explosive sounds which I believe were flash
5 bangs. A few minutes later we walked out towards the crowd gathering on Pine Street. As we
6 reached the intersection of Pine and 5th with our hands up chanting “hands up, don’t shoot” tear
7 gas was deployed near 3:54 p.m. on the north side of the intersection. We felt the effects
8 immediately, burning eyes and hard breathing. We immediately soon after around 4:30 p.m.

9 4. We were not being violent to anyone, and we were not destroying or threatening
10 any property. But SPD still launched chemical agents at us, which I believe was tear gas.

11 5. Two days later, on Monday, June 1, the day began peacefully for my partner and
12 me when we joined the protest at E Pine St and 11th Ave in Seattle’s Capitol Hill neighborhood.
13 We spent time walking around the demonstration, observing the different mutual aid stations that
14 had been established, resting in Cal Anderson Park, and of course at the front line of the western
15 facing barrier participating and voicing our demands.

16 6. Near 9:00 p.m. my partner and I were returning to the western barrier on E Pine St
17 and 11th Ave after grabbing snacks and water from a mutual aid station near E Pike St and 11th
18 Ave. As we reached the corner of E Pike St and 11th Ave we were almost immediately met with
19 flash bags and tear gas without any warning. I was stunned.

20 7. People all around us began running and screaming. As my partner and I snapped
21 back into the moment we began navigating through the cloud of tear gas that had quickly
22 engulfed us to escape. My partner began stumbling, choking on the fumes. The gas had
23 effectively temporarily blinded her. I was slowly losing my sight and suffocating, but was trying
24 to ensure that I could help my partner get far enough away from the tear gas. Five to ten minutes
25 later we reached E Union St and 11th Ave where a civilian medic applied water and milk to my
26 partner’s and my eyes. After receiving help from the civilian medic we rested at E Madison St

1 and 11th Ave at the entrance of Seattle University campus. We sat there and regained our
2 composure for about five to ten minutes before heading back down 10th Ave to receive other
3 protesters fleeing additional tear gas and flash bang deployments. We did not return to
4 protesting.

5 8. On Tuesday, June 2 we arrived at E Pine St and 11th Ave around 6:00 p.m. My
6 partner and I heard from people on the ground and later confirmed that police officers had
7 removed residents from the roof of the apartment building above E Pine and 11th Ave where a
8 video was taken of the previous night's tear gassing. We were nervous there would be another
9 incident and this time it wouldn't be as easily documented. We stayed at the East Precinct,
10 Western Barricade for about 3 hours before we split with the half of the protestors towards the
11 back and marched around Capitol Hill and First Hill. Along the way we lost our apartment key.

12 9. When we arrived back at Cal Anderson Park, there were less people at the
13 precinct, and we were tired so we decided to go home before realizing we were missing our
14 apartment key. We were looking for our key, on 13th Avenue and E Olive St when we heard
15 loud bangs. We ran to the intersection of Pine and 13th to see what was happening and there saw
16 and heard at least ten more flash bangs and saw a cloud of yellow teargas floating into the air by
17 the barricade and quickly left so as not to inhale any of the toxic smoke. As we left we heard
18 more flash bangs going off behind us.

19 10. Before this week of trying to protest, I only symbolically and systemically
20 understood what George Floyd and Eric Garner must have experienced when they were
21 screaming out "I can't breathe." When the tear gas engulfed me on multiple occasions this past
22 week, the words "I can't breathe" became more than symbolic. I personally and physically
23 experienced what it felt like to have police violence literally choke me to a point where I was
24 uncertain if I would remain conscious.

25 11. This experience has affected every part of my life. I can't sleep because every
26 night I'm not at the East Precinct I incessantly check Twitter and Facebook streams of friends

1 and allies to ensure that they are still safe. And when wake up in the morning and I can't work
2 because my brain has been on overdrive worrying all night. Headaches are a constant. Appetite
3 is at an all-time low. The pain and trauma of historical violence and oppression met with day to
4 day to violence perpetrated by the Seattle Police Department has coalesced into what I might
5 describe as one of the worst weeks of my life. I know that when I attend a protest where the
6 Seattle Police Department is present I will never be safe. But I also know that these protests are
7 important part of holding the City of Seattle and police department accountable. If I do not
8 continue to exercise my First amendment right nothing will change so I will continue to protest, I
9 will continue to protect my community knowing fully how this may adversely affect my health.
10 But every day I participate in demonstrations where the Seattle Police Department are present,
11 my anxiety undoubtedly increases. I begin to worry and prepare for the same suffocating feeling
12 I experienced because of their use of extreme force and violence against peaceful protestors.

13
14 Executed this 8th day of June 2020 at Seattle, WA.

15 I declare under penalty of perjury under the laws of the United States and the State of
16 Washington that the foregoing is true and correct.

17
18 By: 
19 ALEXANDER WOLDEAB