

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 CASS BUNTING IN
SUPPORT OF PLAINTIFFS' MOTION FOR
CONTEMPT

I, Cass Bunting, declare and state as follows:

1. 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 Seattle native. I've been out protesting in defense of Black Lives regularly since late June.

3. On Saturday, July 25, 2020, I arrived at the rally right before the group set off on the march. There was a large and diverse crowd of people there to stand in solidarity with Portland, stand up for Black lives and against police brutality both federally and locally.

4. I did not see anyone in the march engage in violence or property damage.

1 5. Just as the protest was passing through the intersection of 13th and Pine, about a
2 block away from the end point of our march when everyone would disperse and go home, SPD
3 bike police attacked us. A peloton of police on bikes came down 13th, splitting the crowd and
4 causing a lot of confusion. I was at the back third of the crowd, directly in the intersection. The
5 atmosphere was hectic and stressful.

6 6. I heard no warnings or audible orders or directives to disperse. It felt like an
7 ambush.

8 7. With no apparent provocation, the police began using munitions on the crowd—I
9 believe flash bangs.

10 8. I felt an explosion at my feet and lost feeling in my feet.

11 9. At that point, I fell back west down Pine and called for a medic.

12 **10. Whatever hit me injured a large area on each of my ankles, causing both**
13 **lacerations and chemical burns. Whatever chemical irritant I was hit with got in my open**
14 **wounds.**

15 11. I had to be carried out of the crowd.

16 12. A medic treated me at Cal Anderson park, quickly rinsing and bandaging my
17 wounds. Police were advancing towards us, and I was worried that police would assault me even
18 though I was unable to move and posed no threat.

19 **13. I couldn't walk at all for about an hour after I was injured, and I'm still**
20 **struggling to walk a day later.**

21 14. From what I've read, I understand that the chemical burns I sustained will likely
22 take several weeks to heal, and **will likely result in permanent scarring.**

23 15. I took photos of my injuries, true and correct copies of which are attached hereto
24 as **Exhibits A-E.**

Executed this 27th day of June 2020 at SEATTLE, WASHINGTON.

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

By: 
CASS BUNTING

EXHIBIT A



EXHIBIT B



EXHIBIT C



EXHIBIT D



EXHIBIT E

