

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 CHLOE MERINO IN  
SUPPORT OF PLAINTIFFS' MOTION TO  
SHOW CAUSE

I, Chloe Merino, 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. On July 25, 2020, I chose to take part in the march against police brutality and in solidarity with Portland.

3. After the march had arrived around the perimeter of the Seattle Police Department's East Precinct, our group had been split into two and there were too many officers to continue marching forwards on Pine St. The group then circled around the block to meet up

1 with the rest of our group from the march on 11<sup>th</sup> and Pine St. Officers were stationed in a line on  
2 every intersection around the East Precinct.

3 4. At the time we walked up, we heard explosives going off at the intersection of  
4 11<sup>th</sup> and Pine along with the others, even though there was no violence from protestors that we  
5 had seen directed at the police.

6 5. I was towards the front line of the protestors facing a line of officers with their  
7 bicycles. Those of us up front only had umbrellas to protect ourselves and the people behind us  
8 from the tear gas that we expected would be deployed.

9 6. After only one minute of standing there, and without any provocation, officers,  
10 without providing any warning, began indiscriminately throwing blast balls and flash bangs into  
11 tight groups of people. The smoke that came from the blast balls caused us all to cough because  
12 we did not have respirators.

13 7. The officers began to advance by pushing us forward with their bikes. They began  
14 violently grabbing people's umbrellas and pushing them and pepper spraying people directly in  
15 the face. Other officers continued to throw flash bang grenades and blast bombs.

16 8. I was complying with the officers and was backing up slowly. The group was  
17 tight, and many people were scared, so we had to be careful not to cause a stampede. At this  
18 point, I was directly in front of an officer. I was not making eye contact or speaking to an officer,  
19 but I was pepper sprayed directly in the face for no reason. I became disoriented and realized that  
20 I could not see. I knew my brother and roommate were somewhere near me, so I yelled out, "I  
21 can't see!" Even after I had been pepper sprayed in the face and though I was yelling, "I can't  
22 see," and was disoriented, the police threw a blast ball directly at me which exploded on my  
23 ankle. I felt immediate pain.

24 9. My brother and a woman next to me grabbed me and led me out of the crowd as  
25 we yelled for a medic. My brother kept the umbrella held up behind our heads, which is the only  
26 thing that saved us from being hit in the head by the other explosives they were throwing, as I

1 heard multiple objects hit the umbrella. Once we found a medic, he began washing out my eyes.  
2 However, even though I was injured, the officers continued to advance on us. I was still unable  
3 to see, but the people I was with told me we needed to move because more officers were coming.

4 10. I walked back to the area the protest began where everyone was regrouping, but  
5 quickly realized that my ankle was becoming more painful. I was forced to leave the protest  
6 because I could no longer walk well enough to be able to escape quickly to avoid future injury.  
7 The next day, the injury seems to be mostly internal, but the pain, swelling, and bruising  
8 continues to increase. Though the mark left by the blast ball may not appear in the appended  
9 pictures, to be severe, I now cannot walk without limping due to the pain and swelling in my  
10 ankle. But when I can safely walk again, I will return to the protests, continuing to assert my  
11 First Amendment rights.

12 11. The violence of the Seattle Police Department (SPD) has increasingly escalated to  
13 an extremely concerning level. I have been active in the “Seattle Protests” since the end of May  
14 as a peaceful protestor. Back in June, they let us protest outside the East Precinct during the day  
15 and usually began dispersing the crowd at night, but on July 25<sup>th</sup> they began dispersal  
16 immediately and without a dispersal order. The actions of SPD on July 25<sup>th</sup> were terrifying. SPD  
17 left no chance for a peaceful protest at the East Precinct; the officers escalated the protest with  
18 their chemical agents, brutality and projectiles that were immediate, constant, and without  
19 provocation.

20  
21 Executed this 26th day of July 2020 at Seattle, Washington.

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

24  
25 By: Chloe Merino

26 CHLOE MERINO