1 THE HONORABLE RICHARD A. JONES 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 BLACK LIVES MATTER SEATTLE-No. 2:20-cv-00887-RAJ KING COUNTY, ABIE EKENEZAR, 10 SHARON SAKAMOTO, MURACO DECLARATION OF ATHENA ADDAMS KYASHNA-TOCHA, ALEXANDER IN SUPPORT OF PLAINTIFFS' MOTION 11 WOLDEAB, NATHALIE GRAHAM, TO SHOW CAUSE AND ALEXANDRA CHEN, 12 Plaintiffs, 13 v. 14 CITY OF SEATTLE, 15 Defendant. 16 17 I, Athena Addams, declare and state as follows: 18 1. The information contained in this declaration is true and correct to the best of my 19 knowledge, and I am of majority age and competent to testify about the matters set forth herein. 20 2. I have been a resident of Seattle since 2016. I am a technical program manager 21 by trade. 22 3. On July 25, 2020, I joined a protest march against police brutality which began in 23 Capitol Hill. We were protesting in solidarity with demonstrations in Portland, Oregon that 24 resulted in a crackdown by federal agents. We began our march between 2:30 p.m. and 3:00 25 p.m., and things continued peacefully until we returned to Capitol Hill at approximately 4:30 26

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p.m. At that point, as we passed the East Precinct, the police descended upon the crowd. It seemed to me that they had been staging somewhere nearby and were waiting until we approached the precinct to make their presence visible.

- 4. The police formed a line and pushed our crowd of demonstrators back down Pine, past Cal Anderson Park. Due to our experiences in June, protesters with umbrellas, goggles, and other protective gear knew to move to the front of the group to shield other, more vulnerable individuals behind them. I had an umbrella, so I moved forward.
- 5. When I reached the front of the crowd, I witnessed law enforcement grabbing protesters' umbrellas aggressively, ripping them out of their hands with enough force to—in one instance—rip the umbrella in half.
- 6. The umbrellas are not weapons, and are purely defensive. They are meant to block the gas and projectiles that the police have been using against protesters. In that sense, they are like the masks we wear.
- 7. Without any warning, an officer seized my umbrella and tore at it, destroying it, and leaving me vulnerable against their chemical agents.
- 8. This made no sense to me. We were protesting, but we were not aggressive or violent. It was a sudden conflict provoked by the police for no reason.
- 9. Simultaneously, law enforcement began shooting cannisters full of some kind of chemical agent into the crowd, where they began emitting gas. These cannisters are shot with extreme force and at a close range. One of the cannisters struck me in the leg, causing serious pain and leaving a significant bruise. True and correct copies of two photos I took of this injury the following day are attached as **Exhibits A-B.**
- 10. The chemical agent wafted into the air and began burning my eyes. Thankfully, I was wearing an N95 mask as a COVID-19 precaution, so I didn't suffer respiratory irritation, although others around me did.

- 11. The abruptness and severity of law enforcement's assault against us was shocking to me. I heard no warning, and I saw no indication that protesters were being antagonistic or threatening; we were just marching. That said, I would have been even more appalled at this attack earlier in the summer, but I have come to expect unprovoked aggression from the Seattle Police Department—so, although deeply startling and upsetting, my experience was not altogether unexpected. I now expect the police to attack protesters, which is a sad commentary on the state of affairs.
- 12. With my eyes stinging, my umbrella crumpled, and my leg throbbing in increasing pain from my injury, I decided that it was no longer safe for me to stay and that I needed to get home to my children. I managed to limp out of the crowd and started to head back to my car. The crowd followed behind me at a distance as the police continued to force them to retreat. Along the way, I passed others heading towards the protest. I warned them that they needed to turn back if they were not prepared to be doused in pepper spray, shot with projectiles, and struck with flash grenades.
- 13. As I continued back towards my car, I passed the restaurant Rancho Bravo. The situation behind me seemed to be escalating. The protesters were screaming, and the explosions were getting louder. This increased my urgency to leave the area, and I hurried back to my car.
- 14. Altogether, I estimate that I left the protest only about ten or fifteen minutes after law enforcement began its assault on the crowd by Cal Anderson. The aggression with which we were forced back with chemical gasses and sprays, struck with projectiles, and physically pushed to retreat was so intense that I was injured almost instantly. It was not an environment where I could continue protesting without further risking my safety.
 - 15. I continue to experience pain and severe bruising from my injury.

1	Executed this 26th day of July 2020 at Seattle, Washington.
2	I declare under penalty of perjury under the laws of the United States and the State of
3	Washington that the foregoing is true and correct.
5	By: Others addams
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7	ATHENA ADDAMS
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EXHIBIT



EXHIBIT B

