

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 ALEXANDRA CHEN
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER

I, Alexandra Chen, 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 have been a resident of the Seattle metropolitan area nearly my entire life. I grew up in Redmond, Washington, and moved to Seattle in August 2019. I have protested in Seattle on several days since May 30, 2020.

3. On Saturday, May 30, 2020, I was marching with a friend in front of police department headquarters on 5th Avenue and Cherry Street. I saw some kind of glass bottle, 4 or 5 plastic water bottles, and one traffic flare thrown by a handful of agitators. The rest of the

1 crowd was peaceful and calm. At this point in time, I was about 30-40 feet back from the barrier
2 and was in the middle of the crowd.

3 4. I did not hear any dispersal order or warning, and I did not see any nonverbal
4 indication by the police that would show to me that the police were about to act. Without a
5 dispersal order and without a warning, the police first deployed flash bangs. People panicked and
6 started scattering. I also started to run and slipped a couple times on the wet ground.

7 5. About 20-30 seconds later, the gas hit. At first, I thought it was just smoke from
8 the flash bangs, but the burning sensation in my eyes and on my skin told me otherwise. I found
9 it hard to breathe. I found it hard to see. The gas got caught under my mask and irritated my skin
10 and got in my mouth. It had a very distinct taste and smell.

11 6. I lost my friend but wasn't going to leave her and so ran around in that area trying
12 to find her. Finally, I found my friend who had been hit by shrapnel and had a serious bruise. My
13 friend and I then left the area.

14 7. An off-duty medic helped me by flushing my eyes out with saline. Another
15 protester poured water over my face to try to get it off my skin. The worst effects lasted about 15
16 minutes, but the lingering symptoms went on for days. The best way I can describe it is that, in
17 the days after, it felt like a sunburn on my face.

18 8. On Monday, June 1, 2020, I participated in the protests in Capitol Hill,
19 approximately in the area near 11th Avenue and Pine Street. I stayed away from the front lines,
20 largely because I was afraid of being gassed again. I didn't have a clear view of what happened
21 in front, but I remember this as "the day of the pink umbrella." The police used flash bangs and
22 tear gas. Though the gas had a similar effect to what I experienced on May 30, I think it was less
23 severe because I was further away.

24 9. I participated in protests in Capitol Hill, again in the area near 11th and Pine, on
25 June 2, June 3, June 4, and June 5. On these days, the police did not use flash bangs, tear gas, or
26 pepper spray.

1 10. On Saturday, June 6, 2020, I was not present when I learned that law enforcement
2 had deployed chemical agents, tear gas or pepper spray, in Capital Hill, the area near 11th and
3 Pine. But when I heard that it had been used, I rushed to join the group. I was shocked and
4 infuriated because I thought the police had violated the mayor's 30-day ban. I wanted to show up
5 to support the other protesters and to show that I would not be intimidated by the use of force by
6 the police.

7 11. Though I showed up about 15 minutes after the chemical agent had first been
8 used, and at this point the chemical agent appeared to be dispersing, I still felt its after-effects. I
9 saw some people leaving as I arrived. I saw many coughing and they appeared to me to be very
10 uncomfortable. The chemical agent this time did not have the same distinctive smell and taste as
11 the gas I experienced the first day. I knew though that it was some kind of chemical agent.

12 12. I don't believe that I have any lingering symptoms from my exposure to tear gas
13 on May 30 or my exposure to other chemical agents on June 1 and June 6. I do feel anxious
14 though, especially about protesting because of police presence at the protests. I am fearful that
15 the police will gas me if I continue to protest. My family and friends have discouraged me from
16 protesting because they're worried about my safety. But the issue of police violence and the
17 danger African Americans face from the police is too important for me to stay home.

18 13. I will continue to protest, but I fear being gassed by my own police force.
19

20 Executed this 8th day of June 2020 at Seattle, Washington.

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

23 By: Alexandra Chen

24 Alexandra Chen
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