

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 SOPHIA BRUCE IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR CONTEMPT

I, Sophia Bruce, 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 student at Grand Canyon University; I currently live near Cal Anderson Park in the Capitol Hill area of Seattle.

3. I have been consistently protesting police violence against Black lives since the protests began in Seattle after the police killed George Floyd. On at least three previous occasions, I have been subjected to flash bangs, pepper spray, and tear gas. On those three

1 previous occasions, I remember intensely inhaling chemical irritants, tear gas and/or pepper  
2 spray from blast balls.

3 4. On July 25, 2020, I participated in a march in support of speaking up against  
4 police brutality. I joined the march around 2:40 p.m. The march started on Broadway and East  
5 Pine Street, in Capitol Hill. The path of the march took the group in a large loop past the youth  
6 jail and then toward the East Precinct in Capitol Hill.

7 5. When the group of people I was marching with got to 12th Avenue and Pine, we  
8 turned a corner and were met by law enforcement officers who used physical force to split the  
9 group. The group I was with moved to the Cal Anderson Field, from which were told to disperse.

10 6. I had previously been separated from my parents but met up with them again near  
11 12th Avenue and Olive. They said that they weren't near the edges of the group and had flash  
12 bangs and blast balls directed at them.

13 7. Then, as we were walking down a hilly street, without any warning, the police  
14 came quickly from behind us, rushed us and used flash bangs, blast balls, and pepper spray. All  
15 of us were peacefully marching.

16 8. At one point, I was one of the few people with an umbrella and I held it open,  
17 facing the police to try to shield myself and those around me from pepper spray. Flash bangs  
18 were rolled toward us, and one detonated approximately 12 inches from my foot. When I saw it  
19 by my foot, I reacted by trying to shield my eyes with my arms, but when it detonated, what I  
20 believe to be a piece of shrapnel blasted into the side of my head.


21 9. The shrapnel impact to my head left me disoriented, and I was unable to hear out  
22 of my left ear for a brief period.

23 10. Fellow protesters assisted me out of the street and towards volunteer medics who  
24 provided me aid. After I had recovered, I left the march and walked home.

25 11. True and correct copies of photos of my injuries are attached as **Exhibits A-C**.  
26

Executed this 26th day of July 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:   
SOPHIA BRUCE

# EXHIBIT A



# EXHIBIT B



# EXHIBIT C



