

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 PLAINTIFFS' MOTION
FOR CONTEMPT

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 my entire life. I grew up in Redmond, Washington, and moved to Seattle in August 2019. I have protested in Seattle beginning on May 30, 2020.

3. On July 25, 2020, I attended a march in Seattle with friends. At the conclusion of the march, the group that I was with reached Cal Anderson Park and was told to disperse; my friends and I left the area from the southwestern side of the park and ended up at the Shell gas

1 station on Broadway and East Pike Street. Within 10 minutes of our arrival, we heard chaos
2 unfolding outside the store. We rushed back outside to find injured people in the parking lots
3 being treated by street medics.

4 4. I went up the street and discovered a standoff between SPD and protesters on
5 Broadway and East Pine Street. There was a lot of gas in the air, and there were flash bangs
6 going off. I had goggles that protected my eyes, but it was impossible to avoid inhaling the gas.
7 It made my face burn. My throat and nose stung badly, triggering coughing fits. It felt similar to
8 what I experienced when I was tear gassed at previous protests. Police were holding a line across
9 Broadway, many of whom had their mace canisters in hand. The rest of the protesters were
10 pushed farther down East Pine Street; the sound of flash bangs and gas drifted back from this
11 area. I saw one man being arrested and held down by several officers. One officer appeared to
12 have a knee on his neck. Eventually the protesters were allowed to continue east on East Pine
13 Street.

14 5. After a significant amount of confrontation, SPD fell back and established a line
15 at 11th Avenue and East Pine Street. I was at the front of the protester group, directly in front of
16 SPD, and I did not see any projectiles thrown at the police. There was a gap of about 3 feet
17 between the protesters and the police. We were there for about 20 minutes without incident.
18 Then someone started a chant of "A-C-A-B all cops are bastards." This is a verbal taunt, not a
19 physical threat. In fact, I saw no projectiles or any threat whatsoever from the protesters. But
20 within moments, and without any notice to the protesters, the SPD mobilized and forcibly pushed
21 the group down East Pine Street. One man in front of me did not move quickly enough and was
22 assaulted with an officer's bicycle.

23 6. As we were pushed back, officers in riot gear and holding batons used copious
24 flash bangs to move the crowd. I was hit several times with small pieces of shrapnel; my friend
25 was hit badly enough to leave a bruise. Every time a flash bang went off near me, I had to fight
26 down the panic and the thought that people have been seriously injured after being hit by one.

1 7. As we moved down the street, there was a woman in front of me wearing a leg
2 brace. She struggled to keep pace with the officers, and they were not allowing her to slow down.
3 I moved to get between her and the police and told them that she was moving, and that she was
4 wearing a brace. An officer responded, “then maybe she shouldn’t be here.” The police did not
5 slow their pace. We were able to disengage and get her to safety at the southwest corner of Cal
6 Anderson Park.

7 8. I joined a group of protesters at the corner of Broadway and East Pine Street. We
8 witnessed two people being arrested. A group of officers in riot gear with their batons in hand
9 gathered just south of our group and began chasing us north on Broadway. They were physically
10 pushing any protester who was not fast enough to keep up with the group. Even though people
11 were complying and moving away from the SPD line, officers physically pushed and used flash
12 bangs and chemical irritants on anyone who was not moving as quickly as the officers wanted
13 them to move. These people were not threats; they just weren’t fast enough. But the police
14 indiscriminately targeted them with flash bangs.

15 9. The officers turned the group east on East Denny Way and drove us into the park.
16 I saw an officer step forward and reach out to shove a man who was walking in front of him with
17 his arms up. Another officer was kicking the back tire of a man with a bike who was walking in
18 front of him. Protesters scattered into the park and then reassembled at 11th Avenue and East
19 Pine Street.

20 10. In an attempt to locate my friends, I walked north on 11th Avenue. There, I
21 encountered an officer in a BearCat threatening a woman in a truck with arrest if she did not
22 move her vehicle. I stepped into the street to film. The woman eventually slowly withdrew, and
23 I held my ground. The officer in the BearCat was announcing that the street was closed to
24 vehicular traffic. I sat down about 15 feet in front of the vehicle. I was the only person in the
25 street. I remained there peacefully for about 5 minutes before a large group of officers
26

1 approached me from behind and told me that if I did not move immediately, I would be subject
2 to arrest. I moved because I did not want to get arrested.

3 11. Although I will continue to exercise my right to protest, I do so with the
4 knowledge that I may be gassed, maced, menaced with batons, shot at with flash bangs and foam
5 bullets, or arrested for doing so.

6 12. Since my involvement with the protests and interactions with SPD, I have had
7 frequent nightmares and jump at everyday loud sounds. I do not believe that any person who
8 wishes to peacefully protest should have to face these threats, although I will continue to protest
9 against the police brutality that is aimed at my Black friends and neighbors.

10 Executed this 27th day of July 2020 at Seattle, Washington.

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

13
14 By: Alexandra Chen
15
16 ALEXANDRA CHEN