

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 KATHERINE  
CONROY IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CONTEMPT

I, Katherine Conroy, 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'm a student in clinical psychology in a PhD program at the University of Washington, focusing on substance use and substance use treatment.

3. As a student of mental health, I have seen how our criminal legal system regularly harms people with mental illness—especially people of color—instead of caring for them. I have been protesting racism and oppression in the criminal legal system and standing up for Black lives since June.

CONROY DECL. (No. 2:20-cv-00887-RAJ)

-1



1           4.       I participated in the march on Saturday, July 25, 2020 until I was injured by a  
2 police explosive of some sort and had to go home.

3           5.       In the afternoon, a group of seven friends and I gathered with other protesters near  
4 Seattle Central before the march began. We participated in group education, listening to  
5 speakers.

6           6.       When the march began, my friends and I were in roughly the middle of the crowd.  
7 As we marched, we chanted, focusing mostly on the demands for police reform articulated by  
8 King County Equity Now, a coalition of Black-led, community-based organizations.

9           7.       **The march was peaceful.** I did not see any protesters throw anything at the  
10 police or do anything else to provoke a violent police response.

11          8.       When we rounded the corner of Pine near the East Precinct, I saw police officers  
12 moving quickly down the hill on Pine towards us. Some protesters began to run away from the  
13 rapidly approaching police force.

14          9.       **With no warning, police started firing a massive number of chemical**  
15 **weapons and projectiles at us. The amount of force they unleashed on us out of the blue**  
16 **was overwhelming.**

17          10.      At the time, my friend Jessica Bonafilia and I had our arms linked. We got hit  
18 with some kind of explosive that seems to have contained pepper spray.

19          11.      I felt pain in my left leg, but I could not see anything on my leg through my jeans.  
20 I looked around and saw other protesters with holes ripped in their clothing and blood seeping  
21 through.

22          12.      A canister dispersed a thick cloud of a chemical into the air that made us cough,  
23 made it hard to breathe, and made my eyes sting.

24          13.      I stepped off the march route into Cal Anderson park as police were pushing the  
25 protesters down Pine to try to wash out my eyes and regroup with my friends.

26          14.      Eventually I joined up with the other protesters again a block back on Pine.



1           15.     **Throughout the march, police were firing projectiles and explosives**  
2 **indiscriminately into the crowd with no warning or clear objective. Of my group of 8**  
3 **friends, half of us got injured by police weapons.**

4           16.     **None of us was violent, or posed any threat. We were there to protest, to**  
5 **assemble, to exercise our rights. We were there to demonstrate against police violence. And**  
6 **we were met with police violence.**

7           17.     Eventually, after a break in the onslaught of force from the police, our group  
8 rounded the corner of Pine and Broadway.

9           18.     **At this point, there were a few lines of protesters between me and the police.**  
10 **Police started to push us back again aggressively, but we could not move back fast enough**  
11 **because some people behind us were not moving, or not moving quickly enough. Some**  
12 **people tripped over traffic cones or other people who had fallen. I was extremely terrified,**  
13 **and believed that I was going to be caught in a stampede caused by the sudden police**  
14 **encroachment.**

15           19.     Although I had linked arms with my friends so we would not get separated, in the  
16 pushing and pulling of the crowd caused by the police, I began to lose my friends, so stepped out  
17 of the crowd when I saw an opportunity to do so without interacting with police.

18           20.     I was scared to stay at the protest without my friends, so I returned to my vehicle  
19 to go home. In the car, my sweat mixed with the pepper spray that was still on my skin making  
20 my eyes sting. It was very hard to see well enough to drive and made me very anxious I would  
21 not be able to get home safely.

22           21.     When I got home and undressed, I saw that the projectile that hit me had left a  
23 large welt on my thigh and a chemical burn through the first layer of my skin. Eventually the  
24 welt turned dark purple and spread across about six inches of my leg.

25           22.     Attached as Exhibit A is a true and correct copy of a photo of my leg, taken the  
26 night of July 25, 2020. Attached as Exhibits B-C are true and correct copies of photos of my leg,




1 taken the night of July 25, 2020 after I took a shower. Attached as Exhibits D-G are true and  
2 correct copies of photos of my leg, taken on July 26, 2020. Attached as Exhibit H is a true and  
3 correct copy of a photo of my leg, taken on July 27, 2020.

4 23. One week later, my injury is healing, but is still visible and painful. Attached as  
5 Exhibit I is a true and correct copy of a photo of my leg, taken on July 30, 2020. Attached as  
6 Exhibit J is a true and correct copy of a photo of my leg, taken on August 1, 2020.

7  
8 Executed this 2nd day of August 2020 at SEATTLE, WASHINGTON.

9  
10 I declare under penalty of perjury under the laws of the United States and the State of  
11 Washington that the foregoing is true and correct.

12  
13 By:   
14 KATHERINE CONROY



# EXHIBIT A







# EXHIBIT B







# EXHIBIT C







# EXHIBIT D







# EXHIBIT E







# EXHIBIT F







# EXHIBIT G







# EXHIBIT H







# EXHIBIT I







# EXHIBIT J



