

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 KRISTI KREIN IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
CONTEMPT

I, KRISTI KREIN, 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 Seattle resident and I have lived in the City of Seattle since 2006.

3. I work as a home healthcare aid and am licensed by the Washington State Department of Health. I primarily work with adults with developmental disabilities in a non-clinical setting. Much of my work involves administering non-traumatic first aid as well as emotional de-escalation. Given the nature of my profession, I am used to working in stressful

1 situations, aiding patients in regulating their emotional response to stressful settings, and  
2 navigating patient care in challenging environments.

3 4. Because of this expertise, I felt called upon to help administer medical aid during  
4 the Seattle protests. I have been involved in the Seattle protests since May 30, 2020. In June, I  
5 began working as a medic administering first aid to protesters. In July, I began taking specific  
6 shifts with a medic collective to provide first aid to protesters at designated places and times.

7 **A. July 25, 2020 Protests**

8 5. On July 25, I was working as a medic for a march from Capitol Hill to the Youth  
9 Jail, and back. As the march arrived at the East Precinct, SPD started to deploy gas on  
10 protesters. Most—if not all—of the protesters were operating peacefully, and still SPD used gas  
11 indiscriminately in the crowd. SPD continued to deploy gas and pepper spray on protesters even  
12 when they were trying to comply with orders and disperse.

13 6. In the afternoon of July 25, a police line formed on Pine Street near the East  
14 Precinct and moved between Tenth and Eleventh. At this time, I stayed back from the line so  
15 that I could administer medical treatment to protesters affected by gas or OC spray, or injured by  
16 shrapnel, blast balls, or other uses of force. Later in the afternoon, the group of medics I was  
17 with followed a large group of protesters to Volunteer Park to administer aid to protesters  
18 attempting to rest and recuperate away from the front lines. We were away from the primary  
19 police line for about an hour.

20 7. When we returned to the Cal Anderson Park area, the police tactics seemed  
21 noticeably different. The police quickly charged at the protesters and began marching them  
22 around the residential blocks near Harvard. We had remained to the back of the crowd, which  
23 meant we were immediately in front of the police line when police changed directions. In this  
24 position, I had a clear view of the protesters. I witnessed the crowd moving as quickly as  
25 possible—indeed many people were winded—and the police were physically pushing the line of  
26 protesters to get them to move faster. If anyone fell, they would fall directly into the police line.

1           8.       I was directly proximate to the police line with other members of the medic  
2 collective. Each of us had our hands up in a defensive position. Even after doing so, I was OC  
3 sprayed from behind. The spray ran down the back of my head and neck. Because I was being  
4 forced to move so quickly and was sweating, the spray spread more quickly and soaked into the  
5 pores of my arms and hands. I wasn't able to flush my skin with saline for some time, and my  
6 skin continued to burn until I went to sleep that night. It looked like I had a bad sunburn the next  
7 morning.

8           9.       I was also hit in the back by police batons as well as the wheels of police bicycles.  
9 I had a bruise on the back of my left calf from this that lasted for three weeks.

10          10.       My teammate on the medic collective also had a flashbang deployed at her face.  
11 It bounced off her safety goggles, and I saw it explode right in front of her.

12          11.       What struck me about these tactics was how egregious the use of force was and  
13 how fast the police forced protesters to march, as well as the duration. Protesters quickly became  
14 exhausted, and yet the police continued to use force in an indiscriminate way even though the  
15 protesters did not have the capacity in that situation to do anything unlawful. Everyone was just  
16 trying to move as fast as they could.

17          12.       After the crowd was driven back to Cal Anderson, my medic team members and I  
18 decided to leave the protests to regroup and administer medical care to our own team. At around  
19 8 or 9 p.m. that night, we returned to the streets to treat lingering injuries but the protesters had  
20 largely dispersed.

21          13.       The tactics of the police throughout the day made it extremely difficult for my  
22 team members and I to successfully administer medical aid to injured protesters. For example,  
23 on several occasions we would be in the middle of treating a patient and the police line would  
24 advance quickly. We would have to leave the patient mid-treatment, which kept us from  
25 providing much-needed first aid. Directly prior to the police line driving the protesters around  
26 near Harvard, I had started administering aid to a man who was slumped over on a bench in a bus

1 stop. He had a laceration on his neck which required immediate attention. As I was taking  
2 gauze out of my bag to treat his wound, the police line rapidly advanced and I had to leave the  
3 area. I don't know what happened to that man, and I still worry about him.

4 14. The medic collective follows the principle that if we are unable to continue to  
5 provide medical care due to the circumstances of the protest, we should leave and find an  
6 environment where we can continue to provide medical aid. Several times throughout the day, I  
7 was unable to administer aid to protesters who were injured by the police's use of force *because*  
8 *of the police's continued use of force*. I was unable to administer medical aid when I was a  
9 direct recipient of the police's use of force, and when I had to leave the field to attend to my own  
10 injuries.

11 15. Prior to July 25, I believed that the Court's restraining order would help keep me  
12 safe while operating as a medic. Now I'm not sure what will happen when I attend a protest as a  
13 medic. However, even though I am less comfortable attending protests after what I experienced  
14 on July 25, I've learned first-hand how critical it is to provide aid for others who continue to be  
15 hurt by the police, especially those at high risk of police violence. Because of this, I plan to keep  
16 attending the protests.

#### 17 **B. SPOG Labor Day Protests**

18 16. On September 7, 2020, I worked as a medic for a peaceful march to the Seattle  
19 Police Officer's Guild ("SPOG") headquarters. I deliberately identified myself as a medic on my  
20 arms, chest, and on my backpack.

21 17. I showed up to the light rail station with a group of other medics, around 10-15  
22 minutes before the march began. People were peacefully gathering in the plaza of the station and  
23 obeying all traffic signs while crossing the streets. There were all kinds of people gathered,  
24 including parents with small children and senior citizens wearing sandals.

25 18. Protesters moved peacefully towards the headquarters. I observed no property  
26 destruction and no violence.

1           19.     When we arrived at SPOG, the building was boarded up with a chain link fence  
2 around it. Soon after we arrived we heard a very loud country song blaring from what seemed to  
3 be the speakers of the headquarters. All of a sudden, a large number of officers on bikes came  
4 around one of the corners and confronted the front line of protesters. I had positioned myself off  
5 to one side to make clear that I was there as a medic, not a protester, and to be available to the  
6 protesters in case the police deployed force. They did.

7           20.     Immediately upon confronting the protesters, the police began pushing bikes into  
8 the crowd, deploying mace, and grabbing at people. My field partner and I moved back quickly  
9 and crossed the street to another parking lot. The police started to use gas to push the crowd to  
10 this parking lot. I was extremely concerned because the lot was blocked by buildings on all three  
11 sides. The risk of trampling was severe, as people who were pushed in were cornered with no  
12 way out.

13           21.     I also witnessed the police moving people extremely quickly. I heard people  
14 yelling “I’m on the sidewalk!” while being forced forward, and heard police yelling at them to  
15 move faster. These people were already moving at a very fast pace. It seemed like the officers  
16 were trying to get them to run.

17           22.     Shortly after I started attempting to treat people as best as I could. I stood on a  
18 rock behind a telephone pole so I had a better view. I saw many people pass by with very clear  
19 irritation on their faces and eyes from the chemicals deployed, and I performed a number of  
20 extremely brief eye washes. Everything had to happen on the fly because the police were pushing  
21 the protesters so rapidly, there was no time for thorough treatment.

22           23.     While heading north I encountered a woman who complained of an injury to the  
23 back of her thigh. She had been hit with something that left powder marks on her leg as if hit by  
24 munitions. She asked if she was bleeding. When we determined she was not, she declined any  
25 additional treatment. She felt it was more important—and safer—to get out of the area and away  
26 from the police line than the obtain treatment. We felt that way too.

1           24.     After this, I ran into a friend and colleague who was protesting at the event. She  
2 had been pepper sprayed so severely that her hair and clothes were completely drenched in spray.

3 **C.     September 23, 2020 Protests**

4           25.     On September 23, I worked as a medic at a march following the announcement in  
5 Breonna Taylor's case. That evening, protesters gathered in Cal Anderson park for a peaceful  
6 march.

7           26.     As we marched towards downtown, we were followed by a brigade of police  
8 SUVs with lights flashing and a patrol of bike cops.

9           27.     At one point, the crowd turned back up towards First Hill and within a block SPD  
10 began quickly advancing on the crowd. SPD pressed the protesters up against the buildings and  
11 there was little room for them to escape. I saw a handful of arrests made.

12           28.     The crowd began moving quickly back towards Capitol Hill to avoid further  
13 contact with the officers. Things were calm for a while, but around 11:30 p.m. SPD began  
14 advancing on the protesters gathered about half a block from the East Precinct. Bike cops began  
15 moving the protesters and detonating flash bangs, pepper balls, and a lot of pepper spray.

16           29.     I became busy treating protesters who were sprayed by SPD. It was clear that they  
17 had been sprayed directly in their face and eyes, and the eye washes took a long time because of  
18 the extensive amount of spray. Their hair was completely soaked and their faces covered in  
19 spray.

20           30.     The officers were pushing the crowd further down Broadway, and I joined a  
21 group of medics providing first aid to someone near Pine and Broadway. My field partner and I  
22 were standing near this group, attempting to provide a privacy shield for the patient being  
23 treated. SPD officers stood nearby, shining their flashlights on us. I saw at least one SWAT  
24 officer pointing a gun directly at us. We were clearly marked on our arms, backpacks, and fronts  
25 with medic symbols. But we were terrified and put our hands up. I wasn't sure what type of gun  
26 it was, but my field partner later told me it appeared to be an impact munitions weapon.

1           31. Later that evening I came upon a person who was lying on the ground. They had  
2 been drenched in pepper spray and were unable to move. We started to administer an eye wash,  
3 but the police line advanced rapidly and we had to leave the area. We had to run away from the  
4 officers, because they were advancing so quickly on bikes. SPD was deploying blast balls and  
5 spray at the retreating protesters and us.

6           32. It became clear to us that the crowd was being moved so fast by the officers that  
7 we would be unable to continue providing first aid, and we left the area.

8  
9           Executed this 29 day of September 2020 at Seattle, Washington.

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 KRISTI KREIN