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12 Attorneys for Plaintiffs

13 [Additional counsel cont. on next page]

14 **NITED STATES DISTRICT COURT**  
15 **FOR THE DISTRICT OF ARIZONA**

16 Puente, an Arizona nonprofit corporation;  
17 Poder in Action, an Arizona nonprofit  
18 corporation; Ira Yedlin; Janet Travis;  
19 Cynthia Guillen; Jacinta Gonzalez  
20 Goodman, individually and as class  
21 representatives,

20 Plaintiffs,

21 v.

22 City of Phoenix, a municipal corporation;  
23 Jeri L. Williams; Benjamin Moore; Douglas  
24 McBride; Robert Scott; Christopher  
25 Turiano; Glenn Neville; John Sticca; Lane  
26 White; Jeffrey Howell; George Herr,  
27 individually and in their official capacities;  
28 and Does 1-20.

26 Defendants.

Case No.: CV 18-2778-PHX-JJT

**DECLARATION OF CINDY  
PÁNUCO IN SUPPORT OF MOTION  
FOR TEMPORARY RESTRAINING  
ORDER**

1 [Additional counsel cont. from first page]

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Attorneys for Plaintiffs

**DECLARATION OF CINDY PÁNUCO**

I, Cindy Pánuco, declare and state:

1. I am a partner at Hadsell Stormer & Renick LLP and attorney of record for Plaintiffs. I am licensed to practice law in the State of California and before this court. I have personal knowledge of the information set forth herein or it is based upon my review of the records maintained by my firm on this case. If called upon to testify, I would testify to the truth of the following:

2. Attached hereto as Exhibit 1 is a true and correct copy of a Photograph showing the Phoenix Police line-up and Protesters at 7:19 p.m., dated August 22, 2017.

3. Attached hereto as Exhibit 3 is a true and correct copy of the City of Phoenix's Presidential Visit After Action Report, dated January 29, 2018.

4. Attached hereto as Exhibit 5 is a true and correct copy of a Screenshot of @azplea twitter response to the Puente lawsuit, dated September 5, 2018.

5. Attached hereto as Exhibit 6 is a true and correct copy of an Image of Google Map of the Protest area.

6. Attached hereto as Exhibit 7 is a true and correct copy of a Photograph of the Initial Pepper Bullets fired circled in yellow with a time stamp indicating it was 8:32 p.m., dated August 22, 2017.

7. Attached hereto as Exhibit 8 is a true and correct copy of the Agenda of Public Safety and Veterans Subcommittee, dated June 13, 2018.

8. Attached hereto as Exhibit 9 is a true and correct copy of the Police Report of Glenn Neville, dated August 22, 2017.

9. Attached hereto as Exhibit 10 is a true and correct copy of the Police Report of Douglas McBride, dated August 22, 2017.

10. Attached hereto as Exhibit 11 is a true and correct copy of the Police Report of Robert Scott, dated August 22, 2017.

11. Attached hereto as Exhibit 12 is a true and correct copy of the Police Report of Christopher Turiano, dated August 22, 2017.

1           12.       Attached hereto as Exhibit 13 is a true and correct copy of the Police  
2 Report of Brian Bachorski, dated August 22, 2017.

3           13.       Attached hereto as Exhibit 14 is a true and correct copy of the Police  
4 Report of Matthew Hamsa, dated August 22, 2017.

5           14.       Attached hereto as Exhibit 15 is a true and correct copy of the Police  
6 Report of James Ray, dated August 22, 2017.

7           15.       Attached hereto as Exhibit 16 is a true and correct copy of the Police  
8 Report of John Sticca, dated August 22, 2017.

9           16.       Attached hereto as Exhibit 17 is a true and correct copy of the Police  
10 Report of Lane White, dated August 22, 2017.

11          17.       Attached hereto as Exhibit 18 is a true and correct copy of the Police  
12 Report of William Gates, dated August 22, 2017.

13          18.       Attached hereto as Exhibit 19 is a true and correct copy of the Police  
14 Report of Brandy Thwing, dated August 22, 2017.

15          19.       Attached hereto as Exhibit 20 is a true and correct copy of the Police  
16 Report of Jeffrey Howell, dated August 22, 2017.

17          20.       Attached hereto as Exhibit 21 is a true and correct copy of the Police  
18 Report of George Herr, dated August 22, 2017.

19          21.       Attached hereto as Exhibit 22 is a true and correct copy of the Police  
20 Report of Rikki Woolgar, dated August 22, 2017.

21          22.       Attached hereto as Exhibit 23 is a true and correct copy of an Image of the  
22 Initial Gas with 8:35 p.m. timestamp, dated August 22, 2017.

23          23.       Attached hereto as Exhibit 24 is a true and correct copy of an Image of the  
24 Dispersed Crowd with an 8:34 p.m. timestamp, dated August 22, 2017.

25          24.       Attached hereto as Exhibit 25 is a true and correct copy of an Image of Man  
26 Being Shot in the Torso with an 8:43 p.m., dated August 22, 2017.

27          25.       Attached hereto as Exhibit 26 is a true and correct copy of an Image of Man  
28 Being Shot in the Torso with an 8:43 p.m., dated August 22, 2017.

1           26.       Attached hereto as Exhibit 27 is a true and correct copy of an Image of  
2 Officers Breaching gate with an 8:44 p.m. timestamp, dated August 22, 2017.

3           27.       Attached hereto as Exhibit 28 is a true and correct copy of an Image of  
4 Officers with their Shields with an 8:51 p.m. timestamp, dated August 22, 2017.

5           28.       Attached hereto as Exhibit 30 is a true and correct copy of an Image of  
6 Woman Being Pepper Sprayed in Face with an 8:51 p.m. timestamp, dated August 22,  
7 2017.

8           29.       Attached hereto as Exhibit 31 is a true and correct copy of an Image of  
9 Woman Being Pepper Sprayed in Face with an 8:51 p.m. timestamp, dated August 22,  
10 2017

11          30.       Attached hereto as Exhibit 32 is a true and correct copy of an Image of Man  
12 Being Pepper Sprayed at Close Range with an 8:51 p.m. timestamp, dated August 22,  
13 2017

14          31.       Attached hereto as Exhibit 33 is a true and correct copy of an Image of  
15 Officer Pepper Spraying Camera, dated August 22, 2017.

16          32.       Attached hereto as Exhibit 34 is a true and correct copy of an Image of  
17 Officer Pepper Spraying Camera, dated August 22, 2017.

18          33.       Attached hereto as Exhibit 35 is a true and correct copy of Officer Body  
19 Camera Footage while in car, dated August 22, 2017.

20          34.       Attached hereto as Exhibit 36 is a true and correct copy of Officer Body  
21 Camera Footage On-Scene, dated August 22, 2017.

22          35.       Attached hereto as Exhibit 37 is a true and correct copy of Phoenix City  
23 Manager Ed Zuercher's Memo re External Assessment of Police response on August 22,  
24 dated August 28, 2017.

25          36.       Attached hereto as Exhibit 38 is a true and correct copy of Aerial Image of  
26 Janet Travis Being Pepper Sprayed, dated August 22, 2017.

27          37.       Attached hereto as Exhibit 39 is a true and correct copy of Aerial Image of  
28 Janet Travis Being Shot with Projectile, dated August 22, 2017.

1           38.       Attached hereto as Exhibit 41 is a true and correct copy of Phoenix Police  
2 Department's Civil Disturbance Response Plan Operations Order.

3           39.       Attached hereto as Exhibit 42 is a true and correct copy of Phoenix Police  
4 Department's Use of Force Operations Order.

5           40.       Attached hereto as Exhibit 43 is a true and correct copy of Article from the  
6 Republic "Police Brutality protest ends with clash with Phoenix Police Department" by  
7 Yihyun Jeong, dated October 26, 2014.

8           41.       Attached hereto as Exhibit 44 is a true and correct copy of Officer Body  
9 Camera Footage On-Scene, dated August 22, 2017.

10          42.       One of the videos cited to in the brief as Exhibit 2 is that of Chief Jeri  
11 Williams at a news conference late that Tuesday night addressing the police response at  
12 the rally ([https://www.12news.com/article/news/crime/trump-rally-protest-ends-with-](https://www.12news.com/article/news/crime/trump-rally-protest-ends-with-police-firing-pepper-balls-arresting-4/466618995)  
13 [police-firing-pepper-balls-arresting-4/466618995](https://www.12news.com/article/news/crime/trump-rally-protest-ends-with-police-firing-pepper-balls-arresting-4/466618995)). I oversaw the downloading of the  
14 video on this website and it is a true and correct copy of the video. Plaintiffs have filed a  
15 Motion for Leave to File Non-Electronic Records and will submit a copy of the video  
16 upon approval of that Motion.

17          43.       Another video cited to in the brief as Exhibit 4 is of an interview Chief Jeri  
18 Williams gave on the Phoenix Police's report following the Trump rally  
19 (<http://azc.cc/2FrabGW>). I oversaw the downloading of the video on this website it is a  
20 true and correct copy of the video. Plaintiffs have filed a Motion for Leave to File Non-  
21 Electronic Records and will submit a copy of the video upon approval of that Motion.

22          44.       Another one of the videos cited to in the brief as Exhibit 29 was a YouTube  
23 Video of the CBS News broadcast of the Phoenix Police's tactics used to control the  
24 crowds ([https://www.youtube.com/watch?v=nX\\_f-Y9oNTM&feature=youtu.be](https://www.youtube.com/watch?v=nX_f-Y9oNTM&feature=youtu.be) ). I  
25 oversaw the downloading of the video on this website and it is a true and correct copy of  
26 the video. . Plaintiffs have filed a Motion for Leave to File Non-Electronic Records and  
27 will submit a copy of the video upon approval of that Motion.

28           The last video cited to in the brief as Exhibit 40 is an Instagram clip from user

1 @dbeishline from the Trump Rally Protest posted August 22, 2017  
2 ([https://www.instagram.com/p/BYH3XW\\_AWUx/?hl=en&taken-by=dbeishline](https://www.instagram.com/p/BYH3XW_AWUx/?hl=en&taken-by=dbeishline)). I  
3 oversaw the downloading of the video on this website and it is a true and correct copy of  
4 the video. Plaintiffs have filed a Motion for Leave to File Non-Electronic Records and  
5 will submit a copy of the video upon approval of that Motion.

6 I declare under penalty of perjury pursuant to the laws of the United States of  
7 America that the foregoing is true and correct.

8 Executed this 13th day of September 2018 in Pasadena, California.

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Cindy Pánuco

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