

I, **JACINTA GONZALEZ GOODMAN**, declare and state as follows:

1. I submit this declaration in support of Plaintiffs' Motion for a Temporary Restraining Order in *Puente v. City of Phoenix*, Case No. CV-18-02778-PHX-JJT.

2. The following information is within my own personal knowledge. If called as a witness, I would and could competently testify to the facts stated herein.

3. I am 33 years old and a resident of Phoenix, Arizona. I participated in, and helped organize, the August 22, 2017 Trump protest because I wanted to express my disagreement with Trump's vision for this country. I believe it is important to be an active and informed member of your community. I thought the protest was particularly important to show peaceful solidarity with my community after the violence in Charlottesville, Virginia, and to demonstrate to Trump, his supporters, and the public how many people are united against Trump's presidency.

4. I am a long-time activist and supporter of immigrant rights and justice for all communities. I am a senior campaign organizer with Mijente, a Latinx/Chicanx activist organization that believes in justice and self-determination for all people. I also frequently volunteer with Puente, a Phoenix-based community organization that seeks to protect the rights of immigrants and the Latinx community. In my role as an activist and community organizer, I frequently organize in the immigrant community and other vulnerable communities, protest anti-immigrant laws, and speak out against police violence and over-policing in communities of color in Arizona and elsewhere.

5. Puente asked me to help organize the August 22 Trump protest. On the day of the protest, my role was to observe the crowd to make sure the protest remained peaceful and positive, and act as a liaison between the Phoenix Police Department ("PPD") and protest organizers. I felt part of my responsibilities was to keep protesters safe. I was positioned on 3rd St. and Monroe and remained there for much of the day.

6. My police contact for the protest was PPD Officer Brockman. We exchanged text messages during the event, and when I saw her at the rally, I introduced myself to her in person. She was aware of my presence and knew she could notify me if she needed assistance or had to relay information to protest organizers.

7. The rally was attended by a large cross-section of people. I saw many people I recognized from the activist community, elderly people, students, children, disabled people, and persons of all races, genders, sexual orientations, and nationalities. The mood was excited but light. I did not witness any confrontations in the area where I was observing. After rally attendees entered the Phoenix Convention Center, the energy level lowered, and the mood was calm.

8. At around 7:59 P.M., I noticed there was increased PPD activity, and they were starting to line up in front of the protesters. The atmosphere was calm and non-confrontational, so I was surprised by PPD's actions.

9. At that point, I got in touch with Officer Brockman by text. We then spoke in person, and she told me that Trump supporters attending the rally were being asked to take a different exit and the police wanted to avoid confrontations between protesters and Trump supporters.

10. At 8:26 P.M., Officer Brockman texted me, "He's gone and no longer downtown," which I took to mean that President Trump had left the Convention Center. At 8:32 P.M., Officer Brockman informed me that fights were breaking out on 2nd Street and Adams and to keep people "out of that area." At 8:33 P.M., Officer Brockman texted me, "[t]hey [PPD] are deploying pepper balls keep everyone away."

11. At approximately 8:35 P.M., PPD officers began to deploy tear gas and other projectiles into the area where I and other protesters were standing on 3rd St. and Monroe. I inhaled gas that caused burning in my eyes and lungs. PPD's use of projectiles, particularly flash bang grenades, caused terror in the area where I was

observing. When I first heard the grenades, I was afraid because they sounded like gun shots. People were panicked and fleeing in every direction. At 8:45 P.M., I texted Officer Brockman, "Where are you?" She replied at 8:46 P.M., "[w]e were told to leave."

12. A true and correct copy of my text messages with Officer Brockman are attached as Exhibit 1.

13. Before deploying gas and other weapons against myself and other protesters, PPD did not request that I or other protesters leave the area or declare that we were engaged in an unlawful assembly. I heard no warning from PPD that they planned to use force on protesters. No one from PPD contacted me and told me to leave the area or to ask other protesters to leave the area.

14. I put on a construction mask to protect my lungs from the gas and began to seek out my friends and loved ones to make sure they were out of the area. After I made sure everyone I knew was safe, I sought out a Puente volunteer who was working on 2nd St. and Monroe to make sure she was also safe. Once I found her, we stayed together as she documented the protest and police response until PPD helicopters overhead instructed everyone to leave the area. I then proceeded to a pre-arranged meeting area to care for those injured and to assess what happened. PPD's use of force caused me to experience burning in my lungs for hours after the protest.

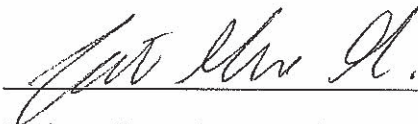
15. At all times during the protest, I was engaged in the peaceful expression of my First Amendment rights. At no point during the rally did I commit any act that was illegal or warranted police involvement. I did nothing to justify PPD's use of physical force against me.

16. PPD's use of force ended the protest before I and other protesters had the opportunity to fully convey our message to the public, Trump supporters, the media, and the President.

17. I have been to many protests throughout my life, and I have never seen a police department, without warning or provocation, use force so egregiously and indiscriminately, without any concern with regards to who may be hurt.

18. I am planning to attend future demonstrations in Phoenix to express my views, but am fearful of what PPD officers may do at future protests and greatly concerned by the lack of oversight and accountability. When police use violence against protesters, its makes it harder for me as an activist and organizer to get others to utilize their First Amendment rights.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on September 13, 2018, in Phoenix, Arizona.



Jacinta Gonzalez Goodman

EXHIBIT 1



iMessage
Tue, Aug 22, 7:59 PM

Hello Ms Brochman. This is Jacinta from Puente. María gave me your number. Just wanted to make sure you had my number in case you needed to communicate.

7:59 PM

Thank you Jacinta... I'm on Monroe close to 3rd Street if you need anything

8:00 PM

Is that you in the blue?

8:03 PM

The taller one in grey and black

8:03 PM

Right in front of you

8:03 PM

He's gone and no longer downtown

8:26 PM

Thanks

8:26 PM

Fights are breaking out on 3rd



iMessage





you need anything

Is that you in the blue?

8:03 PM

The taller one in grey and black

8:03 PM

Right in front of you

8:03 PM

He's gone and no longer downtown

8:26 PM

Thanks

8:26 PM

Fights are breaking out on 2nd street and Adams.... try and keep your guys out of that area

8:32 PM

They are deploying pepper balls keep everyone away

8:33 PM

Where are you?

8:45 PM

Read 8/22/17

We were told to leave

8:46 PM



iMessage

