

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Jared Goyette, Craig Lassig, Michael Shum, Katie Nelson, Tannen Maury, Stephen Maturen, and The Communications Workers of America, *on behalf of themselves and other similarly situated individuals,*

Plaintiffs,

v.

Court File No.:
0:20-cv-01302 (WMW/DTS)

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his individual and official capacity*; Minneapolis Police Lieutenant Robert Kroll, *in his individual and official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his individual and official capacity*, Minnesota State Patrol Colonel Matthew Langer, *in his individual and official capacity*; and John Does 1-10, *in their individual and official capacities,*

Defendants.

DECLARATION OF CHRIS TUIE

My name is Chris Tuite. I declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am an independent photographer, whose work has appeared in the Associated Press. I am from California, but have been in Minnesota documenting the

Derek Chauvin trial, and now the Daunte Wright protests in Brooklyn Center, Minnesota.

2. On Friday, April 16, 2021, I was out photographing the Daunte Wright protests, specifically at the Brooklyn Center Police Station. I was clearly identifiable as press because I had a conspicuous press badge around my neck and I was carrying multiple, professional-style cameras.

3. It was clear that the Minnesota State Patrol recognized me as press because they said directly to me, “Press, immediately leave the area!”

4. Upon telling the press to leave, the State Patrol rounded protesters up in a “kettle” and made mass arrests. While making these mass arrests, they forced me to leave the scene, directing me two blocks away from the “kettle” zone, and did not let me document this event. The badge number of the trooper who told us to leave the area is #2300.

5. As I was leaving the area as directed, a State Patrol trooper threatened me with arrest. He grabbed me by the hood of my jacket and pulled me, as if to take me down to the ground. He ripped my clothes when he grabbed me. That trooper screamed that I was under arrest.

6. Another trooper grabbed me by the arm, pulling me away from the first trooper. He told me to “walk north.” I tried to comply, when at least five more troopers verbally threatened me with arrest and one trooper raised a can of pepper spray to my face, though he did not fire. This trooper with the pepper spray said to me, “You had your free pass.”

7. When I got to the area two blocks away, near a gas station, the Pump n' Munch, I was put into a line and forced to take off my gas mask and helmet. The State troopers then took close up photos of my face, driver's license, and press badge before I was finally allowed to leave.

8. I documented in a video the Minnesota State Patrol troopers taking photographs of other members of the media, just as they did with me. This video is attached hereto as Exhibit A.

9. I intend to continue covering the protests, but I am fearful for my safety and for the safety of my colleagues given the actions of the Minnesota State Patrol tonight, despite the issuance of a temporary restraining order against them.

Dated: April 17, 2020

/s/Chris Tuite

Chris Tuite