

**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 CHRISTOPHER JUHN

My name is Christopher Juhn. 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 a freelance photojournalist, and shoot for a number of different outlets, including local, national, and international news. I have been documenting the Daunte

Wright protests in Brooklyn Center, Minnesota, for various outlets, including the Minnesota Spokesman Recorder.

2. On Friday, April 16, 2021, I was out documenting the Daunte Wright protests, specifically at the Brooklyn Center Police Station. I was clearly identifiable as press because I had a high-visibility vest with “PRESS” written on it, a bullet proof vest with “PRESS,” a press pass, and two cameras.

3. It was clear that the Minnesota State Patrol recognized me as press because they said directly to me, “Media, go north!”

4. About fifteen minutes after I arrived in Brooklyn Center, the State Patrol rounded protesters up in a “kettle” and made mass arrests. And that is when troopers told me to leave the area, to “go north.”

5. I tried to stay near the “kettle,” but the Minnesota State Patrol would not allow me to stay there.

6. The troopers pushed me back toward the Pump n’ Munch gas station. When there, the troopers put me into a line with other press members. They took photographs of my face, my driver’s license, and my press credentials.

7. I wanted to record this interaction, but one of the troopers pushed me backwards, and would not allow me to record it. I asked why they were doing this, and a trooper responded that it was so that they could confirm my identity as media, and not one of the protesters.

8. Despite the trooper’s command, I recognized it was important to document what law enforcement was doing to me, so I recorded the interaction on Facebook Live.

Dated: April 17, 2020

/s/Chris Juhn

Chris Juhn