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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**TUCK WOODSTOCK; DOUG BROWN;
SAM GEHRKE; MATHIEU LEWIS-
ROLLAND; KAT MAHONEY; JOHN
RUDOFF**; and those similarly situated,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal
corporation; and **JOHN DOES 1-60**,
individual and supervisory officers of Portland
Police Bureau and other agencies working in
concert,

Defendants.

Case No. 3:20-cv-1035-BR

**DECLARATION OF JOHN RUDOFF IN
SUPPORT OF PLAINTIFFS' MOTION
FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

I, John Rudoff, declare:

1. I am an Oregon resident who lives in the City of Portland. I am a photojournalist. My work has been published internationally, including my extensive reporting on the Syrian refugee crisis, the 'Unite the Right' Events in Charlottesville, Virginia, the Paris 'Yellow Vest' Protests, and the Rohingya Genocide. I have attended the protests in Portland over the last month for the purpose of documenting and reporting on them. If called as a witness, I could, and would, testify competently to the facts below.

2. I have been covering protests in Portland for at least the last four years. When I attend the protests, I carry and display press identification. The press identification is from the National Press Photographers Association, of which I have been a member for about ten years. I also wear a helmet, which is clearly marked "press." I am not a protester or activist. The reason I am attending is to document what the protesters are doing and how the police are responding.

3. Attached as **Exhibit 1** is a true and correct copy of a photo of me when I was covering one of the George Floyd protests. It shows how I typically dress at the protests. I am prominently displaying my press pass around my neck, I have large camera equipment, and my helmet says "press."

4. Since I began covering protests in Portland, I have been teargassed many times and occasionally shot with pepper balls as a result of the police's indiscriminate use of force. I was most recently shot with pepper balls on June 19, 2020. I was at the Justice Center taking photos. Someone from the crowd went onto the steps. Shortly afterward, the police stormed out and began firing without warning, and I was hit. I am also aware of several incidents in which journalists have been harmed by Portland police's indiscriminate use of force against crowds of protesters, journalists, observers, and medics.

5. I am also aware of incidents in which the police have used force against journalists in a targeted manner, such as when the police beat Donovan Farley with a baton and sprayed him with pepper spray, and similar incidents with Cory Elia.

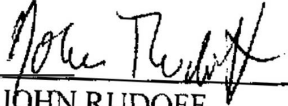
6. Since the George Floyd demonstrations began, the police have been clearing out press along with the crowds so that we cannot see how the police are treating protesters. For example, on June 19, 2020, when I was near the Justice Center, a line of police began pushing the crowd down the street. I showed them my press pass and camera equipment, and an officer responded "move, move, move, we don't care if you're media."

7. This was not the first time I was pushed by police. I am 72 years old. One time two years ago, when the police were clearing out press and protesters alike, I was apparently moving too slowly for an officer's liking, and he hit me with a truncheon. It took me several weeks to recover.

8. I have not attended any protests since June 19, 2020. I would like to continue reporting on the protests, but I am fearful that the police might injure me. I am deeply upset because I cannot do my work because of being forcibly removed from the area of events.

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

Dated: June 27, 2020



JOHN RUDOFF