



My name is Raymond Scott

I am 32 years old.

I have lived at the camp at the end of Bliver St for about six months.

I have a dog, ^{Champer} 3 tents, bikes, & bike parts.

I have clothing & personal belongings in the tent.

I make money by repairing & building bikes.

I have 3 bike projects in my possession currently with frames & parts that belong to my customers, worth \$145.00 upon completion of the work to reconstruct & repair them.

I use my personal bikes to travel to get food, to meet with my caseworker, who is helping me find housing.

My caseworker visits me at this location to help work on getting me housing because she knows she can find me here.

In the past, the City has taken tools & bike parts that were in my possession that belonged to customers.

These bikes & bike parts were repair & rebuild projects I was working on, valued at approximately \$575.00.

I now have an outstanding debt that I must repay to my customers.

This past Wednesday the city took & disposed of approximately \$1800.00 worth of tools that I used in my work to repair & reconstruct bikes.

My great-grandmother, who died 22 yrs ago ~~of~~ of cancer, gifted me an owl figurine that I considered of great sentimental value because owls were her favorite animal.

During a sleep in summer 2024, a city worker reached into my tent & took the owl figurine. I begged them not to take it & told them it was a gift from my great-grandmother.

They still took it and disposed of it.

The Louisiana State Police came to the encampment I'm currently at around 10:20 a.m. this morning.

I am effectively the head of the camp, so I spoke with them.

They said we had to leave within 25 min, that everything

left behind would be disposed of if the grounds bulldozed.

They said the only place it can be is the sanctioned state encampment, that the camp we are currently in is located on state property.

It is a bad idea to confine everyone to the state encampment under US-90 at Calhoun because some people live in different camps because they have problems with each other.

I feel much safer at the encampment I'm currently at because I know the people in this camp & we have worked to create a family environment here, and also because my caseworker & homeless outreach know they can find me here.

I would suffer irreparable harm if I were forced to leave this camp, removed from this community of people I trust, if my caseworker could not find me to help me if housing, & if my only ability to make money is taken away.

Attorney Hope Phelps handwritten my statement
I read it aloud to me.

I authorize her to copy it in a typewritten format
I to make any alterations, additions, or deletions as
needed for clarity.

Sign: ~~Raymond Scott~~ Date 10/29/2024
Print: Raymond Scott

Sworn to and subscribed before me on this
24th day of October, 2024.

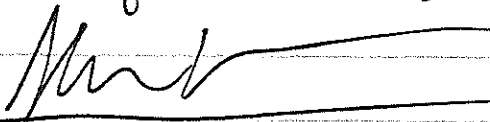

Notary Public

EXHIBIT
B

My name is Armande Hope Alfred

I am 47-years old.

I was living at the Claiborne's Canal Encampment.

LSP, Wildly, stand up this morning & made us move

Wildly had waked us around ~~7-9pm~~ 7-9pm last night & that LSP was going to be coming to make us move.

There were no postal written notices anywhere.

There were people who work away at work & their belongings were destroyed.

LSP said this location is permanent and it is illegal to go back to our previous location.

Even once Taylor Swift leaves, they say we can't go back & we must remain here.

I don't even know when I'm at it I'm from New Orleans.

I think this location is dangerous because I don't know who I am & there are too many people in one place.

I would like to go back to when I was at Claborn ²/₂
Camp.

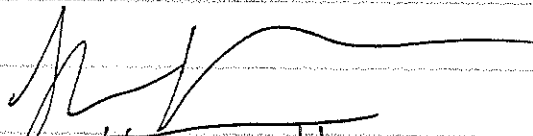
I was working with Unity to get housing, but by the time
LSP dropped me off today it was too late to check in with
Unity to get my name on the list for housing.

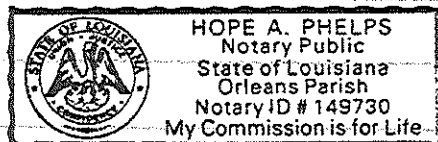
Attorney Hope Phelps handed me my statement in the
read & send to me.

I authorize her to copy it in a typewritten form
& to make alterations, additions, & deletions as needed for clarity

Signature: Amanda Alfred Date: 10-24-24
Print: Amanda ALFRED

Marion McKennie
#00-2802


Notary Public



2024 NOV 22 PM 11:59 AM
DISTRICT COURT
EXHIBIT
C

My name is Jacobson John Richard, Jr.

I am 46 years old.

I was living at the Grand & Clatsop Apartments.

The ~~landlord~~ LSP made me move yesterday.

They did not give any warning or reason.

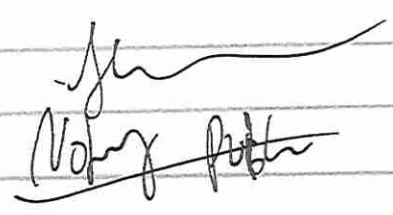
I would like to return to where I was at Grand & Clatsop, but LSP said we can't go back.

Attorney John Phelps ~~has~~ reviewed my statement & read it back to me.

I authorize her to copy it in typewritten format & make alterations, additions, & deletions as need for clarity.

Sign: John R. Jacobson
RJ

Date 10-24-2024


John R. Jacobson

FILED
2021 NOV 25 AM 9:45
DISTRICT COURT

EXHIBIT
D

My name is Eli Samuel Johnson.

I am 38 years old.

I have volunteered with Southern Solidarity for about one year.

I received legal observer training from the National Lawyers Guild, and have volunteered as a legal observer with NOHHARRM for about 3 months.

I have legal observed at 8-6 encampment sheeps

Yesterday, Weds. Oct. 23rd, I arrived at the encampment at 6:30 a.m. in Okla. & Oklahoma by the Greystone Station around 6:00 a.m.

The DOTD showed up first & began taking measures of the area, which I later realized was to install barricades.

LSP arrived 8:43 a.m., they circled the encampment, and parked at 8:45 a.m.

LSP troopers spoke to DOTD & coordinated using DOTD & wildlife troopers to pull into the camp.

The use of 6-7 DOTD trucks, 5 wildlife trucks, & 3 staff
cocks operated by LSP & ATC.

Residents reported to me that LSP had previously told
them they'd have until then to leave the premises.
LSP also told them that Unity would leave them, but
also that if they stayed they'd be arrested.
Their instructors were Conroy & Conroy.
Then we to within hopes possible.

LSP banged on people tents. I heard residents trying
to communicate that some people were away at work.
I saw LSP throw those unoccupied tents away.

I saw LSP rip tents apart with knives, such that
the tents were destroyed.

I heard LSP announce that everyone had to move.
The troops specifically state that the Geneva was
you to move for the Taylor Swift concert.

LSP corralled people from the camp & where speak
that they could only move to the camp off Front
& Majors.

I observed personal property being taken, including tents, & items of
religious & spiritual significance, and decorations people had placed

in $\frac{1}{2}$ on their feet & make it feel like home
until around 1:00pm
I observed at this location until ~~1:30pm~~

At 7:00am this morning, thus Oct 24 I arrived
at the Canal & Claiborne encampment to begin observation

I observed that there were no posted references. A resident
informed me that they were given similar instructions to
the camp I'd observed the day before - ~~that~~ that
the company is conflicting.

This camp is located near a driveway or highway, so it
is not state property

When LSP arrived to sweep the encampment, they told
everyone they had to leave to Frost & Mayfield.
The residents pointed out that they were on City property.
LSP then rephrased the order, if you'd like to remain
you can. The residents declined.

LSP then went across the street to the encampment near
US-90. They arrived at 8:00am in by 8am there was a
line of 3 wildlife trucks, 4 BSA coaches & 2 golf carts
operated by LSP's ATC.

I observed the LSP to interview people at this encampment

LSP bought on tents & told people they were being relocated

I saw LSP dump out a resident's jug of water.
Tents that couldn't be used were destroyed - LSP cut them up with knives

Residents were not allowed the freedom to decide what to do.
I observed that LSP did not interact with residents one on one,
F-8 armed officers would gang up on ~~any~~ interacting w/ residents.
They were not given the freedom to leave & they were told what to do.

I observed at this location until 12am.

I kept coming at the encampment by the airstrip, but LSP had made it the first.

I did not observe any possible photos at this location.
Residents reported to me that tents were destroyed,
~~and residents~~ LSP destroyed ~~another~~ a resident's food stamp card,
& broke an ice chest belonging to someone from the Green Camp

~~Results reported~~ Results reported that tents were
LSP pulled their cars from the camp & flipped their
lights & sirens at 4am, & told residents they had 20min
to pack their things.

The state sanctioned encampment ~~is~~ is the most dangerous because it is the area of that 3rd post block to flood. It is also left away from an active construction site.

~~Residents~~ Residents reported to me that LSP has told them not to leave in that they'll be covered w/ resources at this location but for the same reason they were already covered with at the encampment they can from.

The traffic for this encampment is also extremely dangerous. There is an intersection on ramp 1/2 of ramp 2 visibility for drivers to see pedestrians is poor. Residents must cross hundreds of streets to get to any location.

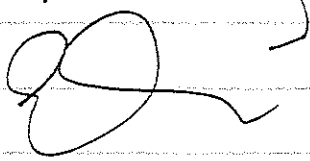
It is also located in the direct path of the overpass that is not even ~~clear~~ clear anymore.

Multiple encampments full of residents have had been consolidated into this state sanctioned 2-block area.

Attorney Anne Phelps handwrote my statement &
then read it aloud to me.

I authorized her to copy it in a typewritten format
& to make any alterations, additions, & deletions as
needed for clarity.

Sign:

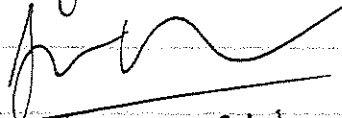


Date: 10/24/24

Print:

ELI JOHNSON

Shown to & subscribed before me on this
24th day of October, 2024



Notary Public

FILED
2024 OCT 25 10:23
CIVIL DISTRICT COURT
FILED
2024 NOV 25 11:09:45
CIVIL DISTRICT COURT

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

2024-09816 STATE OF LOUISIANA

CASE NO:

RAYMOND SCOTT and AMANDA ALFRED

DIVISION: N-8

VERSUS

LOUISIANA STATE POLICE, LOUISIANA DEPARTMENT OF WILDLIFE AND FISHERIES, and LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

AFFIDAVIT OF ALISON POORT

Before Me, the undersigned Notary Public, duly commissioned and qualified in this district and country, personally appeared Alison Poort, who after being by me duly sworn, did depose and say:

1. My name is ^{Alison} Alison Poort.
2. On Wednesday, October 23, 2024, I spent several hours at the encampment at Calliope and Loyola in my capacity as chief of staff for Councilmember Lesli Harris. This began around 9:30 a.m. until around 3:30 p.m.
3. I witnessed the following: When I arrived, a large number of LSP officers, Wildlife officers, and DOTD workers were within the encampment area under the interstate. They were in the process of dismantling tents where no one was there to claim them. I saw officers placing the tents in truck beds.
4. I also saw a front loader, typically used to collect items for disposal.
5. Officers were telling individuals that the encampment was being closed and that everyone would be moved two blocks up Calliope near Home Depot. Belongings were transported in truck beds. People were transported in golf carts because, as one agent said, we know they do not want to feel enclosed.
6. One unhoused gentleman rode his bike up to his tent area. The tent was still there but after looking inside he got on his bike yelling that his belongings were gone. He came back later and spoke with me and another worker, noting his shoes, clothing, and items from his grandmother had been taken. I had seen an LSP officer yelling inside of the tent at least two times and kicking items around.

Exhibit E

VERIFIED

7. I saw the same officer kicking on top of at least two other tents yelling "anyone in there?"

8. A second gentleman arrived after many of the items had already been cleared. I asked him if he had been staying at this site. He said yes and he went to eat at the Rebuild. All of his items were gone when he returned.

9. A third unhoused gentleman approached me and three other city workers crying later in the afternoon. By this point we had proceeded along Calliope toward Home Depot. The gentleman was quietly sobbing, saying he was told they had until Thursday so he went to take a shower. When he returned, all of his belongings were gone. These included clothing, personal memorabilia, ID cards, and his HIV medicine.

10. A fourth unhoused gentleman had an appointment at 1 p.m. to sign a lease. He needed to leave his meticulously arranged belongings, which he said were spiritually blessed, to sign the lease, then could return and move his things into his new home. An LSP officer told the gentleman, "then you have a tough choice to make," implying that leaving the belongings meant they would be thrown away. I stayed with the gentleman's things, along with three other city workers, until he returned with his case worker to pack them up. I had to ask DOTD more than once to please avoid placing barricades directly in between the gentleman and his case worker's car so that he would have a direct route to move his belongings.

11. An LSP officer said that consolidating the unhoused residents into one area would make it "easier for us to serve them." I asked about whether the state would be part of "serving them" and was told no. The officer also told me the move was to benefit residents' health and safety.

12. The same officer said that the plan was to move ("not sweep" he said) the encampment up two blocks. The only other area where the state would be removing ~~houses~~ ^{unhoused} people and bringing them into the new sanctioned encampment was in the French Quarter. Later I was told by DOTD that the cleaning would continue up to the edge of the storage units. LSP officers proceeded to move people past that point into the new encampment without prior notice.

13. A woman was waiting on her case manager to come back and assist her with transporting her final trip of belongings to her newly leased apartment. Wildlife agents said she

needed to move her belongings or they would be removed. I stayed with her, along with another city worker, to ensure her belongings could remain until her case worker returned.

14. LSP and Wildlife agents repeatedly said that the Calliope area and French Quarter were the only areas officers would be going. My city colleague said an LSP officer asked whether she and I would be staying out as late as they would, until 9:00 p.m. She said no.

15. I visited the new sanctioned encampment and noticed it lacked trash cans, portapotties, hand washing stations, or water. I left the site around 3:30 p.m.

16. At 7:11 p.m. I received a text stating "LSP is continuing the sweep now at Gravier and Claiborne and folks had no warning, we're not sure if the city is aware." I shared the information with two city workers. I joined them at the site around 8:30 p.m. and found an area full of left belongings and zero people. My city colleague went to the new encampment and said he spoke with the people formerly at the site. They told him that LSP had told them they needed to leave the site tonight. They had no prior warning nor did I. This area was outside the bounds of where LSP told me they would be removing encampments.

17. I saw people were similarly removed from the intersections of Claiborne and Poydras and Claiborne and Perdido.

18. I visited the new encampment shortly after. Four or five unhoused residents asked for bathrooms, trash cans, and waters. Three NOPD officers were on the scene. An unhoused resident said it was because another unhoused resident at the encampment burned down a third unhoused resident's belongings. I saw a DOTD worker in a fluorescent vest dragging items away. The first unhoused resident said that those were the items set on fire.

19. I drove to Canal and Calliope with two other city workers and saw that the encampment there remained. I went home around 11:00 p.m.

20. On Thursday October 24 I spent several more hours at the encampment at Lafayette and Poydras, as well as the new sanctioned encampment on Calliope, in my capacity as chief of staff for Councilmember Lesli Harris. This began around 10:15 a.m. until around 3:00 p.m. I witnessed the following:

21. At 10:16 a.m. I called a city worker to ask what she had witnessed so far that morning. She told me she was at Lafayette Street near the old city public safety warehouse. She

had the phone on speaker and asked one of the unhoused residents at the site to tell me what happened that morning. He said that state officers arrived at the site and told him and the other residents that they had 25 minutes to pack up their belongings and get out, then the site would be bulldozed.

22. I drove to the Lafayette encampment thereafter. I was already aware that the city had worked with the residents there to get access to housing. I knew that one unhoused gentleman worked at Burger King and that there was a second unhoused couple living there with dogs. I had been to the site numerous times over the prior year assisting with water deliveries.

23. There were at least 20 LSP and Wildlife officers at the site when I arrived. I asked one LSP officer what was happening. He told me, "As you know from yesterday, we are moving people to the one site near Home Depot." I asked how long the unhoused residents would be allowed to remain and pack up their things. He told me as long as they need. I asked whether the residents were given any set number of minutes and he said no. He then asked what I had ever done to help the unhoused individuals.

24. The unhoused gentleman who worked at Burger King was not present, nor did he have a cell phone. Another city worker told me that the state officers said they would be removing his belongings since he was not present to claim them. That city worker told me the gentleman did not have a cell phone to speak with the state agents and would be at work until 1:00 p.m. The city worker drove to the Burger King and picked up the gentleman, then drove him back so that he could claim his belongings. This was before his 1:00 p.m. shift was over.

25. I spoke with that gentleman who told me that it was "the most important day of the year" at work. I asked whether he would be punished for leaving early. He said, "I hope not." He told me had to leave the site by 4:00 a.m. that morning to get to work. He said he had only arrived home to the site at 2:00 a.m. and was told by the other residents that state officers came to the site earlier in the evening. He said he was told they would be back in the morning so he did his best to pile his belongings up in preparation. He said he would be paid within a week and had been working with a case manager on housing. He said he wanted his items placed into storage, not at the new sanctioned encampment site, until he got paid the following Friday. I asked whether the gentleman had any belongings he did not want in storage, such as work uniforms. He

told me he lost his other work uniform in his large pile of belongings in the haste of trying to collect them overnight. Another city worker and I offered to help him get a black polo, which he said would suffice. An LSP officer came over and I advised the gentleman to share what he just told me. The LSP officer said he understood the need for storage and that he would make sure the gentleman was taken care of. The gentleman said a 10x10 storage unit would be sufficient. The LSP officer left. I was on a text thread with public officials who said they'd spoken with the same officer and that he would be ensuring the gentleman was taken care of. Another LSP or Wildlife officer told me they did not want to have the gentleman's employment affected and they would be working with him.

26. About 30 minutes later, the LSP officer arrived with a large flatbed trailer. I received a phonecall so asked my city colleague to ensure with LSP that the items would be taken into storage, as required by law. She approached me after the phonecall and relayed that the LSP officer said that the city would have to provide the storage; he only intended to move the items to the other encampment.

27. At the site was another couple with a dog, and a fourth unhoused person involved with them. This couple included the gentleman I spoke with on the phone who told me the state gave him 25 minutes to pack up and leave. I helped him and the woman sort through their items and pack up the items they wanted to keep. The gentleman said his uncle would be coming to the site to pick up many of the belongings, rather than bring them to the new encampment. For the items he did want to bring to the encampment, he had begun placing them in the Wildlife pickup truck beds. I asked a Wildlife agent what the plan was for transporting them. He said that they wanted to ensure people stayed with their things, so they would not leave until everything was ready. He said "belongings go in the truck and people in the golf cart behind, because they don't like to be confined in the truck." He assured me that the two Wildlife trucks would not leave until the couple was ready.

28. The couple's dog had a visibly injured paw so the woman was sitting with him at all times, except for a period when she allowed a city worker, with whom she and the dog had an established relationship, to be with the dog. The woman had to leave the site with a Southern Solidarity worker to deliver some of her belongings elsewhere, so the fourth unhoused person

city colleague and I that every remaining tent and set of belongings had been identified by their owners (unhoused) as ok to throw away. At least two unhoused gentlemen came back after that point unaware that any activity had occurred. They attempted to collect and move their belongings without the assistance of the state vehicles. The items were not abandoned

agreed to stay with the dog until she returned. One Wildlife agent got in the truck of belongings and started the ignition. I returned to the first Wildlife agent and an LSP officer to advise them that the gentleman and fourth unhoused person could not yet leave, so the truck should not leave. The Wildlife agent kept the car on. The LSP officer went to the fourth unhoused person and asked them to come in the golf cart so they could deliver the belongings to the new encampment. The unhoused person again reiterated that they were staying with the dog until the woman returned. The truck proceeded to drive several hundred feet forward to the end of the unpaved road. I again told Wildlife and LSP agents not to leave and that the unhoused individuals were not ready. They told me they would not leave without the people. They then informed the fourth unhoused person it was time to go and had that person get in the golf cart. They proceeded to leave before the woman returned. She had not signed off that all of her belongings were indeed in the truck.

29. I visited the new encampment site that afternoon around 2:00 p.m. It was noticeably more crowded than the prior night. Several unhoused residents approached me asking again for bathrooms, trash cans, water, and food. One gentleman asked me where he could get a tent. He told me he had a tent at the other site but that the state officers had thrown it away. He told me he got bitten by rats the night before because he did not have a tent to go inside. No state officers were present.

alison pobrt
By Alison Pobrt

Date: October 25, 2024

Sworn to and Subscribed before me on this ²⁵24th day of October, 2024,

[Signature]
Notary Public

DAVID LANSER
Notary Public
State of Louisiana
Orleans Parish
Notary ID # 162391
My Commission is for Life

Affidavit

FILED
EXHIBIT
F
2024 NOV 13 PM 9:45
DISTRICT COURT

My name is Anthony Booth Jr.

I'm 50 years old

I use at the camp by the Simon Bolivar curve

when it becomes longer, near the Grayland station.

I'd been there since near the beginning of

this year.

The LSP car at the camp ^{Oct. 23, 2024} was there during the day.

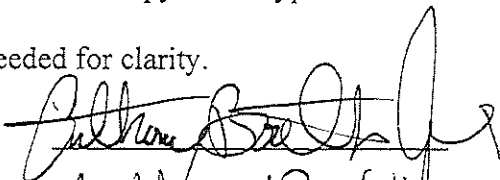
They said everybody gotta go down the street

My laptop, iPhone, & photos of my dead mother
were taken.

I didn't see up to the house but the Louisiana State
policemen were the only ones around with the other state
agents taking stuff & moving tents

Attorney Hope Phelps handwrote my statement and then read it aloud to me.

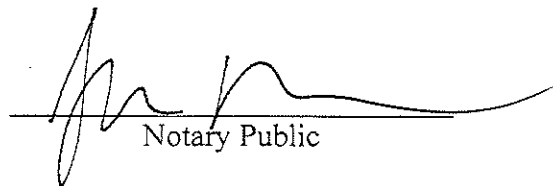
I authorize them to copy it in a typewritten format and to make any alterations, additions, and deletions as needed for clarity.

Signature: 

Date: Oct 29 2024

Print Name: Anthony Boedeker Jr.

Sworn to and Subscribed before me on this 29th day of October, 2024.


Notary Public

2024 NOV 15
DISTRICT COURT CIVIL
EXHIBIT
G

Affidavit

MY NAME is Anthony Andre Howard

I am 44 years old.

I had been living near the Grayhound Station by the Calhoun & Ector's overpass.

This is my first time homeless.

I've been working with my counselor to try to get housing.

I am disabled, and I am prescribed medications for my disability & other medical conditions.

uniform officers came out in both marked NOPD cars & also ~~unmarked~~ unmarked cars

Initially, the ~~Louisiana State Police~~ ^{verbally} came out & told us we would have until the first of November 2024 to move.

Then they came back out & said ^{verbally} we would need to get our stuff together & they'd be back Thurs morning to take us & clear the camp out.

We were never given written notice.

On Wednesday, Oct 23rd, 2024 I left camp at 8:00am to charge my phone at the library & to take a shower & eat

at Rebuild Center.

I returned to the camp around 1:18 pm.

When I got back, it was completely cleared off like nobody had ever been there & no one was around.

I saw empty LSP & State vehicles, but no one was in them.

The area where the camp ~~was~~^{had been} barricaded.

I saw a few belongings scattered on the ground & a pile of garbage & broken tents in the center.

I tried to find somebody around to see what happened, but there was no one.

The camp in the area across from here had been cleared as well.

My medications, including psychiatric medicine & medicine necessary to avoid death from Leishmaniasis, were all gone.

I ran the New Orleans mission to find someone to explain what happened.

A resident I met at the New Orleans mass grave
we all had to go to the state prison camp area.

I had to go there without a tent & did not get
a new one until Kula Blue Bus provided one on Sunday,
October 27, 2024

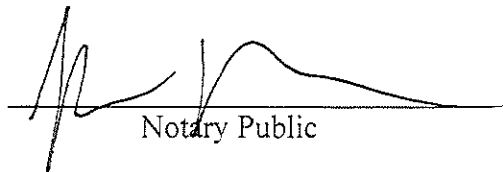
Attorney Hope Phelps handwrote my statement and then read it aloud to me.

I authorize them to copy it in a typewritten format and to make any alterations, additions, and deletions as needed for clarity.

Signature: Anthony Howard Date: 10-29-24

Print Name: Anthony Howard

Sworn to and Subscribed before me on this 29th day of October, 2024.



Notary Public

DISTRICT COURT
2024 NOV 22 AM 9:45
FILED
H

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

CASE NO:

RAYMOND SCOTT and AMANDA ALFRED

DIVISION:

VERSUS

LOUISIANA STATE POLICE, LOUISIANA DEPARTMENT OF WILDLIFE AND FISHERIES, and LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

AFFIDAVIT OF JAMES HOOKER

Before Me, the undersigned Notary Public, duly commissioned and qualified in this district and country, personally appeared JAMES HOOKER who after being by me duly sworn, did depose and say:

1. My name is James Hooker.
2. I am an adult of the full age of majority.
3. I was a resident of the camp at the end of Bolivar Street.
4. I had lived under this highway for 3-years and have not had problems with the police during that time.
5. Previously, we have received three notices from the City.
6. We received the first notice at the end of December 2023, and a City worker verbally told us that only items outside our tents would be taken.
7. But the City bulldozed the entire camp except for two tents - mine and Raymond Scott's - because Raymond and I were there to save our tents.
8. The City took many of our personal belongings and bulldozed other neighbors' tents. *The gas sweaters inside a tent were destroyed, about \$7,000 of damage*
9. ~~I have returned twice since then.~~

10. On the second occasion, my partner was inside the tent when City workers ripped the window off.

11. On the third occasion, which was recent in mid-October, the City took everything out our tents: three water barrels, containers for hauling supplies, a mattress, our clothes, and anything outside.

12. The City workers took my tools, including a vice grip, pliers, socket sets (valued at \$150 each), dent pullers, and bike wrenches.

13. On Wednesday, October 23, 2024, I was aware the Louisiana State Police were breaking down other camps.

14. I came home late after working a 14-hour swing shift.

15. On the way home, I saw lots of police busting up every encampment near ours, and I saw them ripping up people's stuff all along the way.

16. However, I did not see or receive any notice from the Louisiana State Police, the City, or anyone else regarding our camp at the end of Bolivar Street.

17. I have worked at a Burger King location in New Orleans for ~~two years~~ ^{over 3 years.} JH

18. I typically working the morning shift from 5 a.m. to 11 a.m., ~~6~~ ¹⁰ days per week. JH

19. I was working there on Wednesday, October 23rd.

20. On Thursday, October 24, 2024, I left the camp at 3:30 a.m. and worked my normal shift at Burger King from 4 a.m. to 11 a.m.

21. When I returned to the camp, my neighbors said the Louisiana State Police came by that morning and gave a same-day ~~25-minute~~ ^{about half hour} warning that we had to move. JH

22. My neighbors were confused because the Louisiana State Police did not return after ~~25-minutes~~ ^{that day}. JH

23. ~~It sounded like we have to go to the Louisiana State Police and they will take us~~

~~somewhere else.~~ We didn't know where to go because they didn't

24. I did not want to leave the camp at the end of Bolivar Street.

one boy told us that day.

On Friday, October 28th, I got off work at 11:00am & returned to camp.

When I got to the camp, everything & everyone was gone.

My tent, clothes, brand new drill set & drill bits, & birth certificate were gone.

Attorney Hope Phelps handwrote my statement and then read it aloud to me.

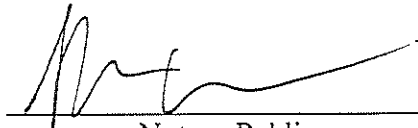
I authorize them to copy it in a typewritten format and to make any alterations, additions, and deletions as needed for clarity.

Signature: James Hooker

Date: 10-29-24

Print Name: JAMES HOOKER

Sworn to and Subscribed before me on this 29th day of October, 2024.



Notary Public

EXHIBIT
I

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

CASE NO: 2024-09816

DIVISION: N-8

RAYMOND SCOTT and AMANDA ALFRED

VERSUS

LOUISIANA STATE POLICE, LOUISIANA DEPARTMENT OF WILDLIFE AND FISHERIES, and LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

AFFIDAVIT OF ANGELA OWCZAREK, LMSW

Before Me, the undersigned Notary Public, duly commissioned and qualified in this district and country, personally appeared ANGELA OWCZAREK who after being by me duly sworn, did depose and say:

1. My name is Angela Owczarek, LMSW.
2. I am an adult of the full age of majority.
3. I have Bachelor of Arts degree from Fordham University, and a Master of Social Work from Southern University.
4. I am a Licensed Master's Social Worker. That means I have both a MSW degree and an active social work license with the Louisiana Board of Social Work Examiners.
5. I have worked in the areas of homelessness and housing for ten years.
6. Over the past week and a half I have been personally going to encampments of unhoused persons and witnessing Defendants' actions and the aftermath of those actions.
7. I was alerted to the recent sweeps planned by the State Police in advance of the Taylor Swift concert.
8. I have been in communication with city officials, nonprofit service providers, legal observers, and unhoused persons regarding Defendants' actions.
9. On Wednesday, October 23, 2024, I received word that state vehicles had arrived at Loyola and Calliope. I personally witnessed that evening that that encampment had been emptied out of people and property.
10. On the morning of Thursday, October 24, 2024, I witnessed state police vehicles surrounding the encampment at Canal and Claiborne at approximately 9:05 a.m.

11. I received a text saying “Ppl at Lafayette told by LSP their things will be thrown away after 25 mins then site bulldozed.”

12. Later that day, I went to the encampment at the end of Bolivar Street and encampment residents confirmed to me that they had been given 25 minutes warning to pack up their belongings.

13. On the morning of Friday, October 25, 2024, I witnessed that the Bolivar Street location had LSP cars and multiple front-loader-style construction/demolition vehicles. I witnessed the front-loader vehicles moving items from the encampment into a large dumpster truck.

14. Based on my personal observations, familiarity with the locations of encampments in New Orleans, and conversations with observers and residents, I am able to identify on a map the locations of various relevant places.

15. The primary difference between the encampments where people were cleared from, and where they were moved to, is the visibility from street level and highway on/off ramps.

16. The state-sanctioned location is not, to my knowledge, safer, cleaner, or having more amenities. (It is in fact further from services, like the New Orleans Mission where unhoused people shower and eat.)

17. It is however, less visible to visitors to New Orleans downtown who take the highway.

18. I went to the state-sanctioned location and saw that it was so crowded that tents were almost on top of each other. In speaking to residents there, I heard multiple stories that the overcrowding was resulting in conflict.

19. I do not recall seeing any trash cans, portapotties, or officials who could provide services or information.

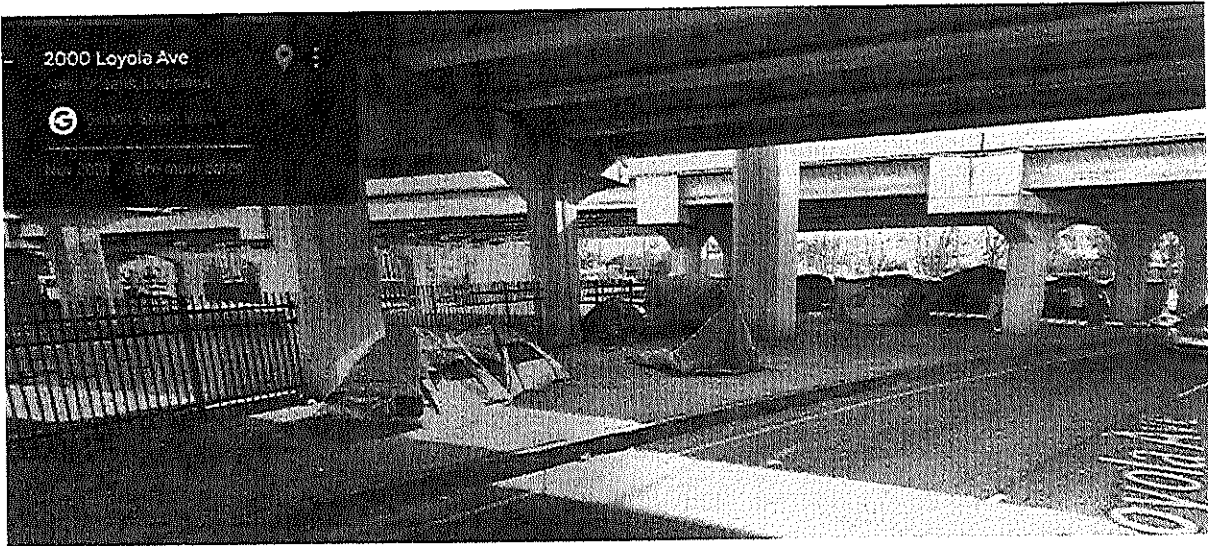
20. The following is a map showing each of the encampments where I am aware people were moved from (marked by yellow pins) and the state-sanctioned location (marked by the red box).



21. The white image overlaid at the bottom of the image is from the City of New Orleans/DOTD Joint Use Agreement # 180.

22. The Loyola/Calliope encampment appears to me to be encompassed by the area of the map of City of New Orleans/DOTD Joint Use Agreement # 180.

23. The following image is from Google Maps Street View, but it shows the location of the Loyola/Calliope encampment that was cleared.



Angela Owczarek
Angela Owczarek

Date: October 31, 2024

Sworn to and subscribed before me this 31st of October, 2024,

William Most
William Most, Notary Public



WILLIAM MOST
Notary Public
Notary ID No. 146425
Orleans Parish, Louisiana

2024 NOV 22 PM 9:15
FILED
DISTRICT COURT

EXHIBIT
J

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

CASE NO: 2024-09816

DIVISION: N-8

RAYMOND SCOTT and AMANDA ALFRED

VERSUS

LOUISIANA STATE POLICE, LOUISIANA DEPARTMENT OF WILDLIFE AND FISHERIES, and LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

AFFIDAVIT OF ELI JOHNSON

Before me, undersigned Notary Public, duly commissioned and qualified in and for the Parish of Orleans, State of Louisiana, personally came and appeared Eli Johnson who, after being duly sworn, did depose and state the following:

1. My name is Eli Johnson.
2. I am thirty-five years old.
3. I have volunteered with Southern Solidarity for about one year.
4. I received legal observer training from the National Lawyers Guild and have volunteered as a legal observer with NOHHARRM (New Orleans Homeless and Houseless Advocacy, Research, and Rights Monitoring) for about 3 months.

5. On the morning of November 24, 2024, I witnessed ~~the~~ Louisiana State Police Troopers ~~arrive~~ ^{were in} at the area around Latrobe Park in the French Quarter.

6. Two troopers ~~emerged from the LSP cruiser,~~ ^{LSP} wearing polo shirts that identified them as LSP Troopers. ^{were}

7. I witnessed these LSP Troopers approach various people on benches in and around Latrobe Park and hand them paper flyers.

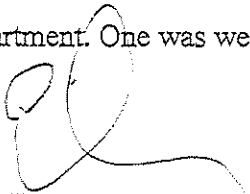
8. I recognized one of these Troopers as having been present at sweeps of homeless encampments on October 23 and October 24, 2024, in areas around the intersection of Canal St. and Claiborne Ave., and also on Poydras street.

9. I witnessed one of my fellow legal observers approach one of the Troopers and ask for one of the flyers that they were handing out.

10. Attached to this affidavit is a true and correct copy of the "NOTICE TO VACATE" provided to my fellow legal observer and subsequently given to me.


11. The LSP Troopers handed this "NOTICE TO VACATE" to individuals. I did not witness the LSP Troopers post the notice to a specific location.

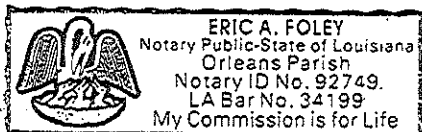
12. Two additional officers were present at Latrobe Park with the LSP Troopers discussed above. I am uncertain if they were affiliated with LSP or with a different agency or department. One was wearing a maroon polo shirt, while the other was wearing a tan polo shirt.



Eli Johnson

Sworn to and subscribed before me on November 24, 2024.



Eric Foley, Notary Public

NOTICE TO VACATE

Please be advised that you are hereby notified to vacate this location within 24 HRS, as your presence is considered a violation. Failure to comply with this notice may result in further legal action. Please see the below resources for assistance.

Resources

EMERGENCY SHELTERS

- Ozanam Inn
2239 Poydras St. 9am-4pm
Everyday

- Hotel Hope
3923 Martin Luther King Blvd. 504-821-7773

- New Orleans Mission
1130 OC Haley Blvd
Open 24 hours

- Low Barrier Shelter
1530 Gravier Street
M-F 7:30am-3pm

- New Orleans Women & Children Shelter
2020 S. Liberty St. 504-522-9340

- New Orleans Family Justice Center
701 Loyola Ave
M-F 8:30am-4pm

- Covenant House
611 N. Rampart St.
Open 24 hours

- Salvation Army
4500 S. Claiborne Ave. 504-899-4569

HEALTH CARE

- Central City Behavioral health
2221 Philip St.
M-F 8am-4:30pm

- Healthcare for the Homeless (Central City)
2222 Simon Bolivar Ave: 2nd floor
M-F 8am-4pm

- Healthcare for the Homeless (Downtown)
1530 Gravier St. (CRRC)
M-F 7:30-3:30pm

- Present Care
1631 Elysian Fields Ave.
M, F 8:30am-5pm W, Th 8:30am-6pm Tu 8:30am-3pm

- Healthcare for the Homeless (West Bank)
1111 Newton St.
M-F 8am-4pm

- Present City Pharmacy
2240 Simon Bolivar Ave.
M-F 8am-5:30pm

RESOURCE CENTERS

- Mission Rebirth
1615 Poydras St.
M-F 9am-4pm

- Rebuild Center
1803 Gravier St.
M-F 8:30am-12pm

- Unity of Greater New Orleans
2407 Baronne St.
M-F 9am-4:30pm

- Goodwill Industries of Southeast Louisiana
3400 Tulane Ave.
M, Tu, W, Th, Sa 9am-8pm Su 10am-6pm

- Travelers Aid
1530 Gravier St.
M-F 7:30am-3pm

- Southeast Louisiana Legal Services
1340 Poydras St
M-F 8:30am-5pm

- Ozanam Inn
2239 Poydras St.
9am-4pm Everyday

- Depaul Community Health Center
5630 Read Blvd
504-248-5357

- Broadmoor Improvement Association
3900 General Taylor St.
M, Tu, W, Th 9am-9pm F 12am-9pm Sa 9am-2pm

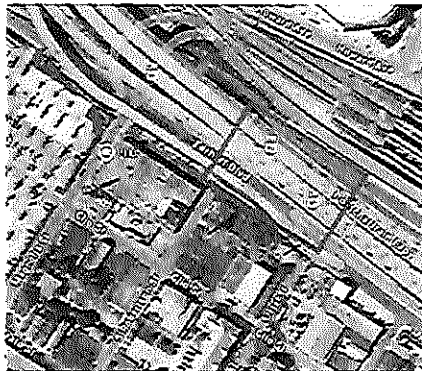
- Hagar's House
3401 Canal St.
504-210-5064

- Grace at the Greenlight
1526 OC Haley Blvd
6:30am-7:30am Everyday

FOOD

- | | |
|---|--|
| Rebuild Center
1803 Gravier St. | Snacks M-F
9am-9:30am Lunch M-F
1pm-1:30pm |
| Ozanam Inn
2239 Poydras St. | daily starting at 6:00am |
| Giving Hope Nola
13040 I-10 Service Road | Tu-F 11am-3pm |
| Grace at the Greenlight
1526 OC Haley Blvd | Breakfast daily
6:30am-7:30am |

ENCAMPMENT SITE



For those who do not comply with the notice to move, you may be assisted in relocating to an encampment at another site.

The encampment will be under US 90B between S Robertson St. and Freret St. with Reverend John Raphael Jr. Way as the overflow point and final demarcation line

**EXHIBIT
J-1**

FILED
2024 NOV 15 AM 9:45
DISTRICT COURT
CIVIL

Affidavit of Trevis G. Fisher

Before me, the undersigned Notary Public, duly commissioned and qualified in this district and county, personally appeared TREVIS G. FISHER who, after being sworn, did depose and say:

- 1) My name is Trevis G. Fisher.
- 2) I am 47 years old.
- 3) I have been living in New Orleans on the streets for about 7.5 years.
- 4) I currently stay in the French Quarter near Latrobe Park.
- 5) Beginning on October 23rd, 2024, LSP Troopers began walking through the area in and around Latrobe Park in the French Quarter, telling people that they needed to leave the area and move to the state-sanctioned camp. There were around 5 LSP officers. They did not post any signs.
- 6) LSP Troopers gave verbal warnings to leave the area prior to the Taylor Swift

concerts, starting on Tuesday, Oct. 22 through Thursday, Oct. 24, 2024. On Thursday night, LSP woke ~~me~~ ^{Tf} me up at around 1 am holding a flashlight to my face and threatened to arrest me if I did not leave the area.

7) During these three days, LSP Troopers told me that I could either have my things taken to the encampment or my things could be taken and thrown away. They also threatened to arrest me.

8) On Friday, Nov. 22, 2024 at approximately 11 am, LSP and two cruisers arrived at the area around Latrobe Park

9) I was standing around the corner on Ursalines and Decatur with a handmade drumset and a shopping cart. They handed me a flier and told me I needed to leave before Monday. They did not tell me when on Monday I needed to leave by.

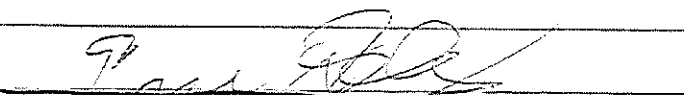
10) On Sunday, Nov 24, 2024, around 8:30 or 9:00 am, two LSP officers handed out fliers at Labadie Park. I recognized one of the officers as one of those present before the Taylor Swift concert telling people to leave the area.

11) I have not seen the flier or any notice posted in any area in The French Quarter.



Trevis G. Fisher

Sworn to and subscribed before me on ~~November~~, 24, 2024.


Eric Foley, Notary Public

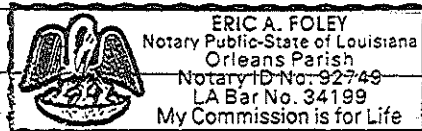


EXHIBIT
L
NOV 25 AM 9:45
DISTRICT COURT
FILED

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

CASE NO: 2024-09816

DIVISION: N-8

RAYMOND SCOTT and AMANDA ALFRED

VERSUS

LOUISIANA STATE POLICE, LOUISIANA DEPARTMENT OF WILDLIFE AND FISHERIES, and LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

AFFIDAVIT OF RAYMOND SCOTT

Before me, undersigned Notary Public, duly commissioned and qualified in and for the Parish of Orleans, State of Louisiana, personally came and appeared Raymond Scott who, after being duly sworn, did depose and state the following:

1. My name is Raymond Scott.
2. I am thirty-two years old.
3. On Friday, October 25, 2024, at around 12:30 p.m., I arrived at my camp at the end of Bolivar Street to find that multiple Department of Transportation and Development trucks and a front loader had cleared away my possessions. I had been in the process of moving those possessions to the new "sanctioned" camp site on Calliope St. / Earhardt Blvd. between Magnolia St. and Freret St.
4. Among my possessions that were seized and disposed of by DOTD were two tents, two of my personal bicycles, two bicycles that I was repairing for a customer, tools, a grill, clothing, shoes, my dogs' leashes and chains, and dog food.
5. I remain unhoused, but I am no longer staying at the sanctioned encampment. I did not feel safe there.


Raymond Scott

Sworn to and subscribed before me on November 24, 2024.


Eric Foley, Notary Public

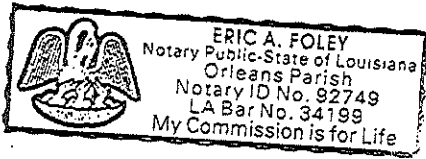


EXHIBIT
M

FILED
2024 NOV 25 AM 9:45
DISTRICT COURT
CIVIL COURT

Eric Foley

From: Jones, Carey <JonesCar@ag.louisiana.gov>
Sent: Friday, November 22, 2024 5:37 PM
To: William Most
Cc: Cheryl McKinney; Boudreaux, Olivia; LaGroue, Amanda; Hope Phelps; David Lanser; Eric Foley; Anjana Joshi; LaGroue, Amanda; Cheryl McKinney; Boudreaux, Olivia
Subject: RE: Scott v. LSP: Next Week's Planned Sweeps - Confidential

It is correct that the relocation involved in the Scott case was concluded prior to the initial preliminary injunction hearing even being set and was, in fact concluded when the preliminary injunction hearing was held.

Late yesterday, I heard that a new operation was being contemplated in other areas of the city that would potentially involve relocating people from those areas.

I was asked to and did help draft a notice that would address your concerns as expressed in Scott since that seemed to be the focus of your client's grievance. We discussed future notices in the Judge Julien's chambers and in an effort to ensure that notice was given in the future, I think we all agreed that written notice was a good idea. In fact, we talked about developing such a notice in the event future operations occurred.

We also discussed in chambers that there could well be future operations similar to those conducted in the Scott matter. There would have been no other reason for us to be talking about notice in the future if other operations were ruled out. We were completely candid about the possibility that future operations based on public health and safety and safeguarding state property might well occur. No one hid the ball on that.

However, the Scott operation was over and done before the first preliminary injunction hearing as Judge Julien recognized when we discussed the case in chambers on November 4, 2024 and again on November 12, 2024. That was correct then, it was correct at the time of the preliminary injunction hearing, and it is correct now. A Court cannot enjoin past conduct.

I assume that the plaintiffs in Scott are unlikely to have a grievance to pursue as a result of a second operation in another part of the City. However, if they do, their grievance will be addressed.

Otherwise, if you file a TRO on Monday or Tuesday, I will probably represent Troop Nola on the TRO and any attendant litigation, but I do not represent State Police as their general counsel.

Have a good weekend, and we can talk further on Monday.



Carey T. Jones
Director, Civil Division
Office of Attorney General Liz Murrill
Phone: (225) 326-6000 Fax: (225) 326-6098
www.ag.state.la.us



From: William Most <williammost@gmail.com>
Sent: Friday, November 22, 2024 4:36 PM
To: Jones, Carey <JonesCar@ag.louisiana.gov>
Cc: Cheryl McKinney <Cheryl.McKinney@la.gov>; Boudreaux, Olivia <BoudreauxO@ag.louisiana.gov>; LaGroue, Amanda <LaGroueA@ag.louisiana.gov>; Hope Phelps <hopeaphelps@outlook.com>; David Lanser <david.lanser@gmail.com>; Eric Foley <Eric.Foley@macarthurjustice.org>; Anjana Joshi <anjana.joshi@splcenter.org>
Subject: Scott v. LSP: Next Week's Planned Sweeps

CAUTION: This email originated outside of Louisiana Department of Justice. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Tom,

Thanks for speaking with me just now. We discussed the upcoming encampment sweeps by LSP. You said you knew that the State Police was planning an operation "very similar to the prior one," but you didn't know exactly what day it was going to occur. You also told me that you personally helped draft the flyer that is being distributed.

I explained that I was very taken aback by the fact that last week you stood in court and represented to the judge that "there is nothing to enjoin" and "the operation is over," but then you personally helped draft a flyer to facilitate future sweeps and personally had knowledge of a future sweep - and did not inform the Court or us.

I also pointed out that you represented to the Court that the need for the operation was to remove people from under state highways for safety purposes. But LSP's operation planned for next week is to move people from locations not under a highway to a location under a highway.

I asked if you would ask the State Police to hold off on their operation for a short period of time to avoid the need for emergency relief, and you said you would not do so because you do not represent the State Police for this upcoming operation, which you contend is unrelated to *Scott v. LSP*.

If any of the above does not match your recollection of our conversation, please let me know.

Anjana Joshi of the Southern Poverty Law Center and Eric Foley of the MacArthur Justice Center have enrolled as additional counsel on this case. Please copy them on any future correspondence.

Thank you,

William Most

--

William Most
Most & Associates
mostandassociates.com
(504) 509-5023

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