

## AFFIDAVIT OF JOAN STEFFEN

I, Joan Steffen, state that the following is a true and accurate statement to the best of my knowledge and belief:

1. I am a third-year law student at Harvard Law School and a member of the Harvard Law School and Massachusetts chapters of the National Lawyers Guild (NLG). The NLG's mission is to unite the legal community with organizers and activists in the service of the people, to the end that human rights shall be regarded as more sacred than property interests.
2. The National Lawyers Guild—Massachusetts Chapter conducts a variety of public interest legal programs, including a Legal Observers® Program.
3. The Legal Observers® Program is part of a comprehensive system of legal support by the NLG Mass Defense Committee designed to enable people to express their political views as fully as possible without unconstitutional disruption or interference by the police and with the fewest possible consequences from the criminal justice system.
4. Legal Observers® are trained and supervised by National Lawyers Guild—Massachusetts Chapter volunteer attorneys.
5. Legal Observers® are typically, but not exclusively, law students, legal workers and lawyers who volunteer for the role.
6. The Legal Observers® volunteer to be present to monitor political rallies, demonstrations, and marches. They are trained not to interfere with police activity during these events.
7. The Legal Observers® have been present at hundreds of political demonstrations and protests in Boston for at least the last 25 years.
8. This Affidavit is based on my personal observations and experiences.
9. I was trained as a legal observer by National Lawyers Guild—Massachusetts Chapter volunteer attorneys in June 2020.
10. On Wednesday, November 3, 2021, I went to Southampton Street in the area near the intersections with Atkinson Street and Topeka Street for the purpose of legal observing during the planned evictions of unhoused people living in tents on the South side of Southampton Street between Theodore Glynn Way and the Boston Fire Department building. I arrived at approximately 7:20am and departed the area at approximately 11:00am.

11. At 7:56am, a Boston Police Department (BPD) car with its flashing lights on pulled into a parking spot in front of the Boston Fire Department building. An officer exited the vehicle and asked another legal observer and I if we were there to help clear the tents from that section of Southamptton Street. We said no. They told us that they were there to “make sure everything goes smoothly while they clear the street.”
12. At 8:32am, another BPD car parked on the south side of Southamptton Street near the intersection with Theodore Glynn Way with its lights on.
13. At 8:38am, a group of representatives from the Boston Public Health Commission (BPHC) began approaching tents at the western end of the stretch of tents noticed for eviction near the Boston Fire Department building. At around that same time, the BPD car parked near the Theodore Glynn Way intersection departed and then returned, parking with flashing lights on in front of the driveway to the United Rentals building.
14. At 8:42am, another legal observer and I approached a small group of BPHC workers near the driveway to the United Rentals building. We asked them what sorts of options they were offering to the people living in tents. The workers said that they were connecting people with housing options, but that they could not tell us more than that. They directed us to another BPHC worker who was present. He stated that the BPHC workers on Southamptton Street were connecting people living in the tents noticed for eviction to other people working in BPHC’s housing department. We asked if he could give us more information about the housing options available to people who did speak to a BPHC housing department employee. He stated that he was not allowed to disclose any more information. We explained that we were legal observers and asked him to confirm that he was not permitted to share the housing options available to unhoused people noticed for eviction. The BPHC worker stated that he could not tell us any more information because he did not want to lose his job.
15. At 9:03am, an unmarked black SUV parked behind the BPD car near the Boston Fire Department building. A uniformed police officer exited the SUV and walked up Southamptton towards Topeka Street. This SUV departed at approximately 9:15am.
16. At approximately 9:57am, the BPD car parked near the driveway to the United Rentals building left. A black sedan with flashing lights was parked along Southamptton near the intersection with Atkinson Street and another BPD car with flashing lights was parked near the island at the intersection with Theodore Glynn Way. There was still a BPD car with flashing lights parked on Southamptton in front of the Boston Fire Department building.
17. At 9:59am, I walked to the intersection of Southamptton and Theodore Glynn Way and observed another BPD car parked on the west side of Theodore Glynn Way. At this time, there were four marked BPD cars and one unmarked car with flashing lights parked along the stretch of road from Theodore Glynn Way to the intersection of Southamptton and

Atkinson Streets. (This does not include the marked BPD car with flashing lights that departed from near the driveway to the United Rentals building at 9:57am.)

Signed under the pains and penalties of perjury on November 8, 2021.

A handwritten signature in blue ink, appearing to read 'Joan Steffen', written in a cursive style.

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Joan Steffen