

## 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 10, 2021, I went to Atkinson Street in the area from the intersection with Southampton Street to the South Bay Jail for the purpose of legal observing during the planned evictions of unhoused people living in tents on Atkinson Street. I arrived at approximately 11:15am and departed the area at approximately 3:00pm.
11. For the entire period when I was in the area, there were two electronic signs posted at either end of Atkinson Street (one in the driveway by the Boston Fire Department building on

Southampton Street and one in front of South Bay Jail at the corner of Atkinson Street and Bradston Street) displaying the words: "ENCAMPMENT REMOVAL TODAY NOV. 10<sup>TH</sup>."

12. When I arrived, there was one BPHC police car with flashing lights parked behind a truck in front of the Southampton Shelter on Atkinson Street and another BPHC car with flashing lights parked in the parking lot between the Southampton Shelter and Bradston Street. For the entire period when I was in the area, one or two BPHC police cars remained parked in the lot between the Southampton Shelter and Bradston Street.
13. At around 2pm, another legal observer and I spoke with a man and woman who were living on the sidewalk along Atkinson Street. They both were fearful of being arrested by the police officers in the area. Both stated that they wanted to enter a detox program, but that they could not find any program with space that worked for them. Both said that they had been waiting on the housing list for a very long time. Both expressed deep fear of going to jail and the severe disruption that would cause in their lives. The woman stated that people had come to where they were living earlier in the day and told them to leave or be arrested. The woman told us that the people said that she should pack up whatever she could carry, and the rest was going in the trash. The woman said that the people she spoke to did not help her find a detox program or offer any way to store her belongings.

Signed under the pains and penalties of perjury on November 11, 2021.



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Joan Steffen