

AFFIDAVIT

Paul E. Hustler, being duly sworn, deposes and says:

1. My name is Paul E. Hustler. I am a sworn member of the Metropolitan Police Department and I hold the rank of Detective Grade II. I have been a sworn member of the Metropolitan Police Department for twenty-two (22) years. I am assigned to the Special Operations Division (SOD).

2. While working as a Metropolitan Police Department, Special Operations Division police officer in September 2002, I was assigned to the Emergency Service Unit (ESU). The unit was to assist with the IMF World Bank protest that day. The unit was dispatched to the area of 15th Street and Pennsylvania Avenue NW to assist with a large crowd of protesters who were gathering in the area of Pershing Park. Pershing Park is located at 15th and Pennsylvania Avenue. As protesters were on the way to the area the concern was to get the protesters off the street. Several officials of the Metropolitan Police Department were standing around monitoring the demonstration as it was growing. Officials who were standing in the area were Chief Charles Ramsey, Assistant Chief Michael Fitzgerald, Assistant Chief Brian Jordan and Assistant Chief Peter Newsham. The official in charge of the ESU truck was Lt. John Alter, with Sgt. Duane Buethe, and Sgt Paul Riley present. Officers on the scene were Charles Patrick, Jim Crisman, and Bernard Richardson. As the number of protesters grew the order was given to push all the people into Pershing Park. CDU units started to funnel the people into the park by forming a police line using police officers and bike units to line the path the protesters were to take. As this was going on officers and officials were watching this take place and I was standing about 8 to 9 feet away from Chief Ramsey and Assistant Chief Fitzgerald, with Assistant Chief Jordan and Assistant Chief Newsham standing around. At this time no arrests of those protesters had been made. As I walked closer, about 5 to 6 feet away from them, I heard Chief Ramsey say we're going to lock them up and teach them a lesson. At this time I said to Sgt. Buethe, "The Chief said they are going to start to lock them up". Officers started to surround the park and push people back into the park. At this time I along with Sgt. Buethe started to walk away. A man from the press stopped me and said "Hey I'm from the press and I want to leave." I called Chief Jordan over and said "Hey Chief, this guy is from the press and he wants to leave". Chief Jordan came over and said "nobody leaves". At this time Sgt. Buethe told me, let's go this isn't right. And we went back to the truck and watched as the crowd was pushed back into the park. At this time, a U.S. Park

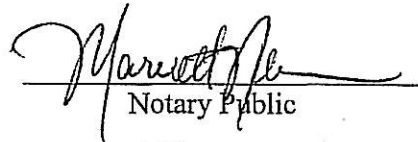
Police Lieutenant also stated that they were not going to participate in this, and that they were going to pull out. Metro buses pulled up and the people were placed on the buses and taken away. After all the arrests were completed, we were ordered By Lt. Alter to go into the park and gather up all the bikes, to cut the locks if they were locked, gather all the back packs and anything else that was the property of the people that were arrested. A police department truck arrived on the scene to pick up the property. The truck arrived on the 15th street side and we loaded the property and bikes onto the truck. While we were cutting the bike locks, Officer Crisman was seriously cut by a roto zip saw and required several stitches.

3. The events and the actions of the MPD officials on the scene would have been documented by police radio transmissions and a running resume' of the chain of events.

4. The foregoing statements are made based on my personal knowledge.


Paul E. Hustler

Subscribed and sworn to before me this 16th day of November, 2009.


Notary Public

My commission expires:

MARVETT C. NELSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires July 14, 2013