

A TALE OF TWO PROTESTS

How the City of Santa Cruz Violated the 14th Amendment's Equal Protection Clause

Category / Protest Name	Black Lives Matter Police Headquarters	Free Speech Street Mural
Date of Protest	June 3, 2020; June 4, 2020	11-Dec-20
Approx. Start Time of Protest	9:00pm	4:00pm
Location(s)	SCPD Headquarters (Center Street)	Church Street (next to library)
Purpose of Protest	George Floyd Death	Non-Decision of Encroachment Permit; Voicing of Silent Consituency Dissent to BLM Mural
Est. # of Protestors	100-200	8-12
Permit?	No	No
Probable Reason No Permit Requested	Planned Rioting	City's Disengagement from Organizer in Nov-2020; City's Referencing of Core Project as Illegitimate
Protest Pre-Notification (Addressee)	None	Santa Cruz Police Department
Date of Pre-Notification	N/A	2-Dec-20
Pre-Notification Topics	N/A	Date/Time of Protest; Washable Paint; Request for Police Traffic Control
Protestor Damage Control Measures	None	Washable paint; Garden hose in case forecasted rains did not arrive that evening
Traffic Control Requested? / Delivered?	No / Most Certainly	Yes / None
Public Officials on Scene	Mayor, Chief of Police(?)	None
Type of Damage	Permanent graffitti paint on police station window and public sidewalks; broken downtown windows	Temporary (washable) street paint
Est. Damage	* TBD	\$0
Proximity of Police During Violations	Held "at a distance"	Intervened into protest venue
# of Arrests	* None identified in media search	1
Names of Arrestees	* TBD (if any)	Organizer (name withheld)
# of Citations	* None identified in media search	1
Categories of Citations	* TBD (if any)	Vandalism
Cause of Protest Termination	Peetered Out	Organizer's arrest while engaging in protest

* TBD - this information will be subpoenaed from the Santa Cruz Police Department or other city records during Discovery phase; this information is expected to show that the SCPD allowed the illegal BLM protests to take place without SCPD interference or arrests; if any arrests and citings did take place, we will request full records of individual names, contact information, the individual citations, whether these individuals were detained and removed from the venue, whether charges ever reached the Office of the District Attorney and whether these individuals were prosecuted.