

Exhibit G

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERIC WILKINS, MAHARI BELL,	)	
ESSENCE JEFFERSON, JOSE	)	
MANUEL ALMANZA, JR., AND	)	
JACQUEZ BEASLEY,	)	
	)	
	)	
Plaintiffs,	)	Case No. 23-cv-4072
	)	
v.	)	Hon. Mary M. Rowland
	)	
CITY OF CHICAGO	)	
	)	
Defendant.	)	
	)	

DECLARATION OF PLAINTIFF JACQUEZ BEASLEY

I, Jacquez Beasley, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a named plaintiff in this lawsuit.
2. I am a 23-year old Black man who currently resides in the Humboldt Park neighborhood on the West Side of Chicago. I understand that approximately 34% of the residents of Humboldt Park are Black people and 50% are Latino people.
3. At the time this lawsuit was filed, I resided in the Austin neighborhood on the West Side of Chicago. I understand that approximately 73% of the residents of Austin are Black people and 19% are Latino people.
4. I work for the Chicago Park District as physical instructor at Humboldt Park. My job requires me to drive frequently throughout the West Side of Chicago, such as driving from one Chicago Park District park to another to pick up or drop off equipment or perform other work assignments.

5. I am also a Co-Leader of the Austin Safety Action Plan (ASAP), a youth-led public safety and violence prevention initiative in Austin. I also have done occasional gig work for food delivery services such as DoorDash, driving throughout Chicago.

August 25, 2020 Traffic Stop

6. On or around August 25, 2020, CPD officers pulled me over at or near 5640 West Lake Street in Austin.

7. CPD claimed that the officers allegedly pulled me over for not wearing a seatbelt. However, I believe this was a false or pretextual reason for the stop.

8. The officers released me without a citation for any alleged violation.

September 25, 2020 Traffic Stop

9. On or around September 25, 2020, CPD officers pulled me over at or near 1000 North Central Avenue in Austin. At that time, I was making food deliveries for DoorDash.

10. CPD claimed that the officers allegedly pulled me over for driving without headlights on. I believe this was a false or pretextual reason for the traffic stop.

11. The officers released me without a citation for any alleged violation.

October 2020 Traffic Stop

12. In or around October 2020, CPD officers pulled me over near West Madison Street between South Kilpatrick Avenue and South Kenton Avenue on the West Side.

13. I was driving with a group of friends in the car—all young Black men. An unmarked CPD squad car was driving on the opposite side of the road toward us. As the CPD vehicle approached my vehicle, the CPD officers turned their flood lights onto my car, allowing the officers to see that the driver was a young Black man with dreadlocks accompanied by a group of other young Black men in the car. The officers then immediately made a U-turn to pull me over.

14. The officers stated the basis for the stop was allegedly that I was not wearing a seatbelt. I believe this was a false or pretextual reason for the traffic stop.

15. The officers released me without a citation for any alleged violation.

May 17, 2021 Traffic Stop

16. On or around May 17, 2021, CPD officers pulled me over at or near 3965 West Ohio Street on the West Side of Chicago.

17. CPD claimed that CPD officers allegedly pulled me over because I did not have two license plates on the car. However, I believe this was a false or pretextual reason for the traffic stop.

18. The officers questioned me about guns, weapons, and/or drugs. I denied having any contraband in my car.

19. The officers released me without a citation for any alleged violation.

Spring/Summer 2021 Traffic Stop

20. Sometime between approximately April and July 2021, CPD officers pulled me over near North Laramie Avenue and West Madison Street on the West Side of Chicago.

21. The officers stated that they pulled me over allegedly for not having two license plates on my car. However, I believe this was a false or pretextual reason for the traffic stop.

22. My brother was a passenger in the car with me. The officers asked both of us for our names. I stated my correct name, but my brother provided a false name. Moments later, I told the officers my brother's real name.

23. Within minutes, a large group of additional plainclothes officers arrived at the scene. The officers ordered me and my brother out of the car. We complied. The officers put my brother in handcuffs.

24. The officers frisked both me and my brother.

25. The officers asked me for permission to search my car. I gave consent because I feared that refusing to give permission for the search would cause the officers to escalate the situation, including potentially using greater verbal or physical aggression and/or arresting me or my brother.

26. The officers asked if there was anything illegal in the car. I replied there was not. The officers then searched my vehicle.

27. The officers found no contraband and no evidence of any criminal activity in my car.

28. Neither my brother nor I were ever accused of or charged with any crime related to the stop. The officers released me without a citation for any alleged violation.

August 12, 2021 Traffic Stop

29. On or around August 12, 2021, CPD officers pulled me over while I was driving near 3805 West Washington Boulevard, across the street from Garfield Park on the West Side of Chicago. I was working for the Chicago Park District and driving from Genevieve Melody Elementary School to Garfield Park for a work assignment. I was wearing my Chicago Park District uniform.

30. The officers claimed that they pulled me over for allegedly not having two license plates on my car. I believe that this was a false or pretextual reason for the traffic stop.

31. The officers ordered me to get out of my car. One of the officers searched my car by peering into the back seat.

32. The officers released me without a citation for any alleged violation.

July 17, 2022 Traffic Stop

33. On or around July 17, 2022, CPD officers stopped me while I was driving near 206 North Parkside Avenue on the West Side of Chicago.

34. CPD claimed that the alleged reason for the stop was that I did not have a front license plate on my car. However, I believe this was a false or pretextual reason for the traffic stop.

35. The officers released me without a citation for any alleged violation.

August 18, 2022 Traffic Stop

36. On or around August 18, 2022, CPD officers stopped me while he was driving near 514 North Parkside Avenue on the West Side of Chicago.

37. An officer told me that he allegedly pulled me over because my tail light was burned out. However, I believe this was a false or pretextual reason for the traffic stop.

38. The officers released me without a citation for any alleged violation.

January 10, 2023 Traffic Stop

39. On or around January 10, 2023, CPD officers pulled me over at or near 3840 West Madison Street on the West Side of Chicago. I was driving with two friends, both young Black men with dreadlocks, who were in the front passenger seat and the back seat of the car, respectively, at the time of this stop. An unmarked CPD car was driving on the opposite side of the road toward my car. After the CPD car passed me, the officers made a U-turn to pull me over.

40. I believe it was because the officers saw my race and the race of my passengers that they decided to stop us.

41. The officers told me that the alleged reasons for the stop were that my license plate tag was expired and I had a burned-out headlight. However, I believe these were false or pretextual reasons for the traffic stop.

42. Before the officer even stated the alleged traffic violation, the officer asked me if I had a Concealed Carry License (“CCL”) and if I had a gun in my possession. I responded that I did not have a gun.

43. The officers released me without a citation for any alleged violation.

January 23, 2023 Traffic Stop

44. On or around January 23, 2023, CPD officers stopped me as I was pulling into the parking lot of my workplace, Columbus Park, at 408 South Central Avenue on the West Side. I was driving to work at the time of the stop.

45. A CPD squad car was driving on the opposite side of the road toward me as I approached the Columbus Park parking lot. I had just parked my car in the Columbus Park parking lot when the same CPD squad car pulled behind me. The officers appeared to have made a U-turn, after having driven past me, in order to pull behind me and conduct a traffic stop.

46. CPD claimed that the alleged reason for the stop was that I did not have a license plate on the front of my car. However, I believe this was a false or pretextual reason for the stop.

47. Before the officer even stated the alleged traffic violation, the officer asked me if I had a CCL “or anything like that.”

48. The officers released me without a citation for any alleged violation.

February 20, 2023

49. On or around February 20, 2023, CPD officers pulled me over near North Central Avenue and West Corcoran Place on the West Side of Chicago.

50. The officers claimed that I allegedly had made a right turn from an improper lane. However, I believe this was a false or pretextual reason for the traffic stop.

51. The officers released me without a citation for any alleged violation.

September 28, 2023 Traffic Stop

52. On the evening of September 28, 2023, CPD officers detained me while I was parked on West Erie Street and North La Salle Drive in the River North neighborhood of downtown Chicago. I was sitting in the driver's seat, with three of my friends seated in the passenger seats. All of us are young Black men. We had just left a nearby dinner event honoring us for community leadership and violence prevention work with the Austin Safety Action Plan.

53. One officer accused me of smoking cannabis in the car. Later, this officer stated that the reason for the stop was that allegedly I was parked illegally. However, I believe that both of these were false or pretextual reasons for the traffic stop.

54. The officers ordered all four of us to exit the car. The officers put my hands and my friend's hands on top of the car. The officers questioned me about guns or weapons. I responded that I had no guns or other weapons.

55. The officers frisked me and my friend.

56. The officers then searched my car without consent.

57. The officers did not seize any contraband from me, my friends, or my vehicle.

58. The officers released us without issuing a citation for any alleged violation.

March 7, 2024 Traffic Stop

59. On the night of March 7, 2024, CPD officers pulled me over at or near South Hamlin Boulevard and West Washington Boulevard on the West Side of Chicago. I was driving home after picking up food from McDonald's. A friend of mine, a young Black woman, was in the passenger seat.

60. An unmarked CPD car was driving on the opposite side of the road toward me. After the CPD car passed me, the officers made a U-turn to pull me over. I believe the officers decided to stop me after they saw my race and the race of my passenger.

61. The CPD officer did not provide any reason why I was stopped. The officer asked me what I was “tucking,” which I interpreted to mean that he believed I had tried to hide contraband. Then the officer asked me whether I had any weapons in the car. I responded that I did not.

62. The officer shined his flashlight through the windshield and the side windows of the car. He ordered me to move each of my legs, apparently to see if I had contraband hidden under my legs. I complied, even though I knew I had no contraband in my possession.

63. The officer released me without a citation for any alleged violation.

June 28, 2024 Traffic Stop

64. On June 28, 2024, in the early evening, CPD officers pulled me over at or near North State Street between Pearson Street and Chestnut Street in Chicago’s River North neighborhood. I was driving in River North for a youth conference and I had a friend, another young Black man, in the passenger seat of the car.

65. The officer claimed that he pulled me over allegedly for driving without my headlights turned on after dusk. However, I believe that this was a false or pretextual reason for the stop.

66. The officer asked me whether my passenger or I had a FOID card, and whether we had any weapons in the car. I stated that I had a FOID card but did not have any weapons in the car. While one officer had this conversation with me, another peered intently into my back seat as if searching for something.

67. The officers released me without a citation for any alleged violation.

April 16, 2025 Traffic Stop

68. On the evening of April 16, 2025, CPD officers pulled me over at or near the intersection of South Kostner Avenue and West Flournoy Street on the West Side of Chicago.

69. The officers stated that they stopped me allegedly because a rear brake light was out.

70. They ordered me to exit the car and they searched the car without my consent. They threatened to put me in handcuffs during the search.

71. The officers also frisked me.

72. The officers did not seize any weapons, drugs or other contraband.

73. The officers then released me without a citation for any alleged violations.

74. I drive regularly throughout the City of Chicago, including in the West Side neighborhoods of Austin, Humboldt Park, West Garfield Park, East Garfield Park, and West Town where a majority of the residents are Black and/or Latino.

75. I understand what it means to be a named plaintiff and to serve as a class representative in this lawsuit.

76. I want to serve as a class representative because my experiences with frequent pretextual CPD traffic stops have left me feeling violated, frustrated, harassed, humiliated, and racially stereotyped by CPD.

77. I want to serve as a class representative to end CPD's practices of conducting high volumes of pretextual stops in neighborhoods like mine where the majority of residents are not white, eliminate all unjustified racial and ethnic disparities in traffic stops throughout the City, and

take all the other necessary steps to eliminate CPD's mass traffic stop policy challenged in this lawsuit.

78. If certified by the Court, I am prepared to fulfill my responsibilities as a class representative.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 20th day of July 2025.

Jacquez Beasley
Jacquez Beasley