

Exhibit C

**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 ERIC WILKINS

I, Eric Wilkins, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a named plaintiff in this lawsuit.
2. I am a 54-year-old Black man and I reside in the Roseland neighborhood on the Far South Side of Chicago.
3. I am an organizer for Communities United, a racial and social justice organization, working to improve public safety and repair relations between the community and police in Roseland.
4. I am the father of two boys, ages thirteen and nine.
5. As a gun violence survivor, I have a physical disability for which I use a wheelchair and/or wear braces on my legs.
6. I am the founder of the Broken Winggz Foundation, an organization that provides support for people with physical disabilities from gun violence, along with their families.

7. CPD has subjected me to at least three traffic stops within the two years before the filing of this lawsuit, and another traffic stop after I filed this lawsuit. I have been subjected to approximately one to two traffic stops per year in prior years.

8. The majority of my traffic stops have occurred on the Far South Side of Chicago in Roseland where I live and where I understand more than 95 percent of residents are Black.

9. In none of these stops did CPD issue a citation for a moving violation or seize any contraband.

Early Summer 2022 Traffic Stop

10. In early Summer 2022, a CPD officer stopped me while I was driving near East 106th Street and South Indiana Avenue. This stop occurred in or around the Roseland neighborhood, where I live, in the 5th Police District (Calumet), on the South Side.

11. To the best of my recollection, the officer stated he was pulling me over for allegedly for failing to come to a complete stop at a stop sign. However, I believe this was a pretextual reason for the stop.

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

June 20, 2022 Traffic Stop

13. On the night of June 20, 2022, CPD officers pulled me over near East 110th Street and South Michigan Avenue. This stop occurred again in or around the Roseland neighborhood.

14. The officers told me that they pulled me over because my license plate was not adequately lit or for failing to use my turn signal. However, I believe these were pretextual reasons for the stop.

15. The officers searched my vehicle without my consent. The officers found nothing incriminating in my car.

16. The officers questioned me about guns and falsely stated that I had a FOID card.

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

November 2022 Traffic Stop

18. In or around November 2022, CPD officers stopped me while I was driving near South Wabash Avenue and East 104th Street. This stop again occurred in or around the Roseland neighborhood.

19. To the best of my recollection, the officer stated he was pulling me over allegedly for failing to come to a complete stop at a stop sign. I believe this was a pretextual reason for the stop.

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

April 18, 2024 Traffic Stop

21. On April 18, 2024, I was parked in my vehicle on East 108th Street between South Michigan and South Wabash Avenues in Chicago. This location is in or around the Roseland neighborhood.

22. I was sitting in my car while speaking on my phone. Suddenly a CPD squad car pulled up behind me and two officers exited and approached my car.

23. I rolled down my window to speak to the officers. The officers questioned me about my registration and license plates. I provided my registration and insurance, establishing that I owned the car.

24. Eventually, two more CPD squad cars and approximately four CPD officers, some uniformed and some in plain clothes, arrived and surrounded me and my vehicle.

25. The CPD officers ordered me to step out of my car, handcuffed me, patted me down, and instructed me to stand next to my car.

26. The CPD officers also asked to search my car. I consented to the search only because I wanted the encounter with CPD to be over quickly.

27. The CPD officers did not find any contraband in my car.

28. They issued me a citation for alleged registration violations and arrested and detained me for several hours at a police station. The charges were dismissed.

29. I continue to drive regularly in Chicago, most frequently in the South Side of Chicago neighborhoods of Roseland, Englewood, Pullman, Chatham, and South Shore.

30. To the best of my knowledge, in each of these neighborhoods, more than 80 percent of residents are Black.

31. My experiences with frequent pretextual CPD traffic stops have left me feeling embarrassed, harassed, deeply disrespected, targeted, and racially stereotyped by CPD. I believe that CPD officers assume that I and other Black drivers are guilty of a crime based on the color of our skin. CPD's pretextual traffic stop practices cause me to feel separated from society and have damaged my self-esteem. When I encounter a CPD officer, I immediately feel myself entering self-defense mode and I feel afraid to make eye contact with the officers.

32. As a community organizer working to improve relations between CPD and community members, I have observed that CPD's practice of routinely targeting Black drivers for pretextual traffic stops causes many Black Chicagoans to distrust and disdain CPD officers—causing officers to be viewed as overseers rather than public servants.

33. I feel like I am not free in my own neighborhood because I have experienced repeated pretextual traffic stops by CPD.

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

35. I know I am one of hundreds of thousands of Black drivers who have been pretextually pulled over, frisked, and subjected to a vehicle search by CPD in the last ten years.

36. I know that CPD also disproportionately targets Latino drivers for pretextual stops, frisks, and searches of their vehicles as compared to white drivers.

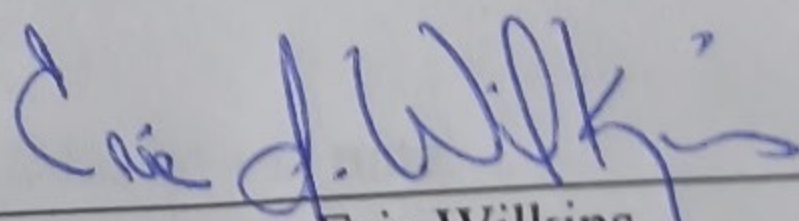
37. I want to serve as a class representative because my experiences of being pretextually pulled over, frisked, searched, and subjected to racial discrimination by CPD officers has caused me to fear for my safety and to feel humiliated, degraded, and demeaned. From my experience as a community organizer, I have learned that my feelings and experiences are typical for Black and Latino drivers in Chicago subjected to pretextual traffic stops by CPD.

38. 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.

39. 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 16 day of July 2025.


Eric Wilkins