

Exhibit D

**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 MAHARI BELL

I, Mahari Bell, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a named plaintiff in this lawsuit.
2. I am a 27-year-old Black man. Currently, I live in the Auburn Gresham neighborhood, where approximately 94 percent of residents are Black, on Chicago's Southwest side. At the time this lawsuit was filed, I lived in the South Shore neighborhood, where more than 90 percent of residents are Black, on Chicago's South Side; and I have also recently resided the North Austin neighborhood, where more than 75 percent of the residents are Black, on Chicago's West Side.
3. I am currently working as a security guard at a hospital. In the past I have worked part-time as a delivery driver for meal delivery companies, including UberEats and DoorDash, among other positions.
4. I served as a Combat Medic with the Illinois Army National Guard from 2016 to 2022, at which time I received an Honorable Discharge.

5. Since I got my driver's license, Chicago police have stopped me more than ten times, including sometimes multiple traffic stops in a single week. In some of these stops, as described further below, Chicago police handcuffed me and searched my car. I have never received a traffic ticket or been arrested during any of these traffic stops, and officers have never found any contraband.

November 18, 2017 Traffic Stop

6. On or around the afternoon of November 18, 2017, CPD stopped me while I was driving at or near 1059 East 76th Street. This stop occurred in or around the Greater Grand Crossing neighborhood on the South Side.

7. According to CPD's records, CPD stopped me for allegedly driving with an improperly displayed vehicle registration. However, I believe this was a false or pretextual reason for the traffic stop.

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

April 4, 2022 Traffic Stop

9. On the evening of April 4, 2022, two CPD officers pulled me over at or near 201 South Western Avenue on the Near West Side while I was picking up a delivery for DoorDash from a Wendy's restaurant.

10. A CPD officer told me that he stopped me for driving "right of center." I believe this was a false or pretextual reason for the traffic stop. The officer quickly told me that he would not give me a ticket. But then the officer asked me whether he had a Concealed Carry License ("CCL") for a gun, or any weapons in the vehicle. I stated that I did not have any weapons in the vehicle.

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

April 5, 2022 Traffic Stop

12. On the early morning of April 5, 2022—*less than six hours* after the previous stop—CPD officers pulled me over at or near 1535 South Pulaski Road. This stop occurred in or around the North Lawndale neighborhood on the West Side.

13. A CPD officer told me that he allegedly stopped me for failure to come to a complete stop at a red traffic light. I believe this was a false or pretextual reason for the traffic stop.

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

May 9, 2022 Traffic Stop

15. On the early morning of May 9, 2022, CPD officers stopped me at or near 20 East 35th Street on the Near South Side.

16. A CPD officer told me that he stopped me for allegedly driving without my lights on. I believe this was a false or pretextual reason for the traffic stop.

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

May 29, 2022 Traffic Stop

18. On the evening of May 29, 2022, CPD officers pulled me over near 233 West Jackson Boulevard in downtown. I was driving my girlfriend's vehicle with her permission to complete a delivery for UberEats.

19. A CPD officer stated that he pulled me over for allegedly "overtaking" a vehicle without using a turn signal. I believe this was a false or pretextual reason for the traffic stop.

20. The officers questioned me about whether there was cannabis in the vehicle, which I denied. The officers ordered me to shut off the car and step out of the vehicle. At that point, one of the officers handcuffed me with my hands behind my back. I was not resisting the officers'

orders and I questioned why they had handcuffed me. An officer told me, “This is what we do. The handcuffs go on as easily as they come off. . . . You know, everybody does it. It’s the way we do it.”

21. The officers searched the car that I was driving.

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

January 17, 2023 Traffic Stop

23. On January 17, 2023, CPD officers stopped me while I was driving at or near 23 East Jackson Boulevard in the Loop while I was completing deliveries for UberEats.

24. A CPD officer told me that he stopped me for allegedly turning right at an intersection where turning right is prohibited. I believe this was a false or pretextual reason for the traffic stop.

25. An officer asked whether there were any weapons in the vehicle. I stated that there were no weapons in the vehicle.

26. The officers released me without any citation for any alleged violation.

March 10, 2023 Traffic Stop

27. In a four-day period in March 2023, CPD officers subjected me to three traffic stops.

28. On or around the evening of March 10, 2023, CPD officers pulled me over at or near 211 East Ontario Street on the Near North Side while I was completing deliveries for UberEats.

29. According to CPD’s records, CPD allegedly stopped me for driving with a burned-out taillight. I believe this was a false or pretextual reason for the traffic stop.

30. The officers released me without any citation for any alleged violation.

March 11, 2023 Traffic Stop

31. On the morning of March 11, 2023—*i.e.*, the day after the previous stop—CPD officers pulled me over at or near 214 South Laramie Avenue in the Austin neighborhood on the West Side. At the time I was stopped, I was on my way to the Loop to complete deliveries for UberEats.

32. A CPD officer told me that the reason for the stop was allegedly for operating a vehicle without a properly displayed rear license plate. I believe this was a false or pretextual reason for the traffic stop.

33. The officers released me without any citation for any alleged violation.

March 13, 2023 Traffic Stop

34. On the late morning of March 13, 2023—two days after the previous stop—CPD officers pulled me over at or near 231 South State Street in the Loop while I was completing deliveries for UberEats.

35. A CPD officer stated that he pulled me over for allegedly driving a vehicle without a rear license plate. I believe this was a false or pretextual reason for the traffic stop.

36. The officer asked me whether I had any weapons in the vehicle. I denied that there were weapons in the vehicle.

37. The officers released me without any citation for any alleged violation.

June 11, 2023 Traffic Stop

38. On or about June 11, 2023, in the early evening, CPD officers pulled me over on East 18th Street near South Wabash Avenue in the South Loop area.

39. An officer told me that they allegedly pulled me over for an expired vehicle registration. I believe this was a false or pretextual reason for the stop.

40. The officers used flashlights and peered throughout the interior of my car.

41. The officers released me without any citation for any alleged violation.

May 15, 2025 Traffic Stop

42. On or about the afternoon of May 15, 2025, CPD officers pulled me over near the intersection between South Wabash Avenue and East 40th Street, in or around the Bronzeville neighborhood on Chicago's South Side.

43. A CPD officer told me that he stopped me allegedly for the tint on my car windows. I believe this was a false or pretextual reason for the stop.

44. A CPD officer also asked me about a Firearm Owner Identification ("FOID") card and whether I had any firearms in the car. I denied having any firearms in the car.

45. The officer released me without any citation for any alleged violation.

May 28, 2025 Traffic Stop

46. On or about the early evening of May 28, 2025, CPD officers pulled me over near the intersection between South Halsted Avenue and West 111th Street, in or around the Roseland neighborhood on Chicago's Far South Side.

47. A CPD officer told me that he stopped me allegedly for the tint on my car windows. I believe this was a false or pretextual reason for the stop.

48. A CPD officer also asked me whether I had any firearms in the car. I denied having any firearms in the car.

49. The officer released me without any citation for any alleged violation.

July 14, 2025 Traffic Stop

50. On or about the early evening of July 14, 2025, CPD officers pulled me over near the intersection of South Lake Park Avenue and East 35th Street, on the Near South Side.

51. A CPD officer told me that he stopped me allegedly for failing to signal a turn. I believe this was a false or pretextual reason for the stop. CPD officers also later alleged that an expired registration and/or equipment violations were reasons for the stop, which I also believe to be false or pretextual.

52. A CPD officer asked me about my CCL card and whether I had any firearms in the car. I denied having any firearms in the car.

53. The officers released me without any citation for any alleged violation.

54. I continue to drive regularly in the City of Chicago.

55. I want to serve as a class representative because CPD's repeated pretextual traffic stops have deeply affected me. They make me feel like I am just a statistic to CPD—just another data point and another young Black man to stop, investigate, and toss aside—rather than a human being who is trying to go about my life in peace. I feel officers approach me during traffic stops in an accusatory manner, with a predetermined idea that I am a criminal or suspect, or someone who is carrying weapons or drugs. Sometimes I feel like I should move out of Chicago to avoid CPD's harassing traffic stops. CPD's traffic stops have also impacted my trust and perception of CPD officers.

56. 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.

57. 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 **20~~th~~** day of July 2025

Mahari Bell

Mahari Bell