

Exhibit E

**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 ESSENCE JEFFERSON

I, Essence Jefferson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a named plaintiff in this lawsuit.
2. I am a 31-year old Black woman. I live in the Bronzeville neighborhood (Grand Boulevard Community Area) on the Near South Side of Chicago with my preschool-aged son. I understand that approximately 92% of the residents of the Grand Boulevard Community Area are Black.
3. Currently I am a full-time parent. I am a certified paralegal. Additionally, I have incorporated my own business in the field of self-care.
4. CPD has subjected me to numerous traffic stops since 2018. In one traffic stop in 2019, while I was driving a rental car for my then-employer Enterprise Rent-A-Car, officers violently assaulted me without cause and then arrested me, with the charge subsequently dismissed and expunged. On all other occasions, CPD did not issue any citation and did not seize any contraband from me or my vehicle during a traffic stop.

August 12, 2019 Traffic Stop

5. On August 12, 2019, CPD stopped me at 1224 South Western Avenue on the West Side. I was driving one of my employer's cars back to an Enterprise Rent-A-Car parking lot when CPD officers pulled me over.

6. Officers did not tell me at this time why they stopped me, and I believe this was a pretextual traffic stop. I do not believe that I committed any traffic or other infraction that justified the police pulling me over.

7. While I was stopped at a red light, an officer exited a police SUV (which did not have its lights illuminated) and suddenly approached my driver's-side door and tried to force open it open even though it was locked. I was in fear for my life and safety.

8. When the traffic light turned green, the officer returned to his SUV and I proceeded through the intersection. The police followed me without emergency lights illuminated. As I approached the Enterprise parking lot, the police SUV then illuminated its emergency lights. I promptly pulled over in the Enterprise lot and parked the car. Additional police officers arrived and grabbed me violently. They handcuffed me and caused significant pain.

9. I believe the officers had no basis to stop, handcuff, or arrest me. They charged me with misdemeanor/traffic violations that were later dismissed, expunged, and sealed.

February 3, 2022 Traffic Stop

10. On the afternoon of February 3, 2022, CPD officers pulled me over at or near 7358 South Lafayette Avenue on the South Side of Chicago. I had my baby in the back seat of my car.

11. CPD officers claimed they allegedly stopped me for driving a vehicle with an expired registration. However, I believe this was a false or pretextual reason for the traffic stop.

12. After asking for my license, registration and insurance information, the officers asked me whether she had a Firearm Owner Identification (“FOID”) card, a Concealed Carry License (“CCL”), or a gun in my car. I stated that I had a FOID card but I did not have a gun in the car.

13. CPD released me without a citation for any alleged violation.

June 8, 2022 Traffic Stop

14. On the evening of June 8, 2022, CPD officers pulled me over at or near 126 East 43rd Street on the South Side of Chicago.

15. CPD officers claimed that they allegedly stopped me for failure to properly display the vehicle’s registration. However, I believe this was a false or pretextual reason for the traffic stop.

16. After asking for my license, registration and insurance information, the officers asked me whether I had a FOID card, a CCL, or a gun in my car. I stated that I had a FOID card but I did not have a gun in the car.

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

November 22, 2022 Traffic Stop

18. On the afternoon of November 22, 2022, CPD officers pulled me over at or near 4160 South Halsted Street on the South Side of Chicago.

19. According to CPD’s records, CPD allegedly stopped me for failure to properly display a vehicle registration. However, I believe this was a false or pretextual reason for the traffic stop.

20. CPD released me without a citation for any alleged violation.

February 6, 2023 Traffic Stop

21. At or around the evening of February 6, 2023, CPD officers pulled me over at or near West 51st Street and South Wentworth Avenue on the South Side of Chicago. I was driving my then-partner's car, with my toddler son in the back seat.

22. The CPD officers did not explain to me why they stopped me.

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

June 16, 2023 Traffic Stop

24. On the afternoon of June 16, 2023, CPD officers pulled me over at or near the intersection of West 76th Street and South Vincennes Avenue on the South Side of Chicago. I was on the way to pick up my son from preschool.

25. A CPD officer told me that they stopped me because of an alleged problem with my car's registration. However, I believe this was a false or pretextual reason for the stop.

26. The officers released me without a citation for any alleged violation, but I was late picking up my son from preschool.

July 7, 2023 Traffic Stop

27. On the afternoon of July 7, 2023, CPD officers pulled me over on or near 69th Street on the South Side of Chicago. I had just picked up my son from daycare and we were driving to a local park.

28. A CPD officer told me that I was stopped allegedly for making an improper right turn. However, I believe this was a false or pretextual reason for the traffic stop. Next, the officer scolded me about an alleged issue with my car insurance, but I had valid auto insurance and, again, I believe this to be a false or pretextual reason for the traffic stop.

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

November 22, 2023 Traffic Stop

30. On or around the afternoon of November 22, 2023, CPD officers pulled me over at or near West 60th Street and South Halsted Street on the South Side of Chicago.

31. The CPD officers at first refused to inform me of the reason for the traffic stop when I asked. Later in the interaction, an officer claimed I was stopped for allegedly driving with expired license plates. However, I believe this was a false or pretextual reason for the traffic stop. Then an officer asserted that my windows were allegedly unlawfully tinted. I believe this, too, was a false or pretextual reason for the traffic stop.

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

Mid-January 2024 Traffic Stop

33. In mid-January 2024, CPD officers pulled me over at or near 74th Street and South Vincennes Avenue on the South Side of Chicago.

34. The officers told me that they stopped me because my license plate tags allegedly were expired. I believe this was a false or pretextual reason for the traffic stop.

35. While I was reaching into my wallet for my license, the officers observed that I had a FOID card in my wallet. They asked me whether I had a gun on me or in my car. I replied that I did not have a gun.

36. The officers then accused me of possessing a small personal amount of cannabis in my purse. The officers stated that, based on this observation, they planned to search my entire car.

37. One of the officers reached his hand through my open driver-side window and opened my driver-side door from the inside, ordering me to step out of the car.

38. The officers then placed me in handcuffs and began searching my car without consent. The officers searched throughout the interior of my car, including my glovebox, and also searched inside my purse.

39. After completing their search, the officers did not seize any contraband from my car or purse.

40. The officers removed the handcuffs and released me without issuing a citation for any alleged violation.

41. Due to the prolonged traffic stop and vehicle search, I was late to meet my grandmother and late to pick up my son from preschool.

42. I continue to drive regularly in the City of Chicago, most frequently in the neighborhoods of Bronzeville, Auburn Park, and Greater Grand Crossing on the South Side, where a majority of the residents are Black. Having experienced multiple frightening traffic stops in the past, I choose my routes carefully to avoid police encounters, and I sometimes alter my driving route if I see a police car ahead, in order to avoid being pulled over again.

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

44. I want to serve as a class representative because CPD's repeated pretextual traffic stops have deeply affected me. These repeated, disturbing traffic stops by CPD officers have made me feel discouraged and withdrawn, as well as distrustful of police. During and after the traffic stops described above, I was nervous, scared, upset and shaking. The fact that officers repeatedly have pulled me over for no valid reason has undermined my confidence and made me question myself. CPD's treatment has made me feel embarrassed and humiliated.

45. 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.

46. 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 day of July 2025.

Essence Jefferson
Essence Jefferson