

Exhibit F

**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 JOSÉ MANUEL ALMANZA, JR.

I, José Manuel Almanza, Jr., pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a named plaintiff in this lawsuit.
2. I am a 38-year-old Latino man. I live in the Little Village neighborhood, part of the South Lawndale community area on the West Side of Chicago. I understand that more than 80 percent of the population is Latino in the South Lawndale community area.
3. Currently I am the Director of Advocacy and Movement Building for a racial justice community organization based on the West Side. I am also a volunteer community organizer for the housing justice organization Únete La Villita.
4. I served as an active-duty Corporal in the United States Marine Corps from 2008 to 2012, at which time I received an Honorable Discharge.
5. CPD has subjected me to many traffic stops, including approximately 12 traffic stops since 2021. Most, if not all, of these stops have occurred in or around the North or South Lawndale neighborhoods on the West Side of Chicago, where I live. While CPD has pulled me

over many times, I have never been given a ticket or arrested, and CPD has never found any contraband on my person or in my car.

Five Traffic Stops in 2021

6. In or around summer and early fall, 2021 CPD officers stopped me approximately five times in a period of approximately five months. These stops occurred on the West Side of Chicago, near my residence. I believe each stop was a pretextual traffic stop.

7. During at least some traffic stops in 2021, officers asked me whether I had a Firearm Owner Identification (“FOID”) card and/or whether I had contraband or weapons in my car.

8. After each of these traffic stops, officers released me without a citation for any alleged violation.

Two Traffic Stops in Summer 2022

9. In or around the early- to mid-summer of 2022, CPD officers stopped me two more times while driving in or around the West Side of Chicago. I believe each stop was a pretextual traffic stop.

10. After each of these traffic stops, the officers released me without a citation for any alleged violation.

September 1, 2022 Traffic Stop

11. On or about the morning of September 1, 2022, CPD officers pulled me over at or near 2650 South Kedzie Avenue in the Little Village neighborhood.

12. CPD officers allegedly stopped me for driving a vehicle with improperly displayed registration. I believe this was a false or pretextual reason for the traffic stop.

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

Early 2023 Traffic Stop on South Kedzie Avenue

14. In approximately the first quarter of 2023, CPD officers stopped me at least four times while driving.

15. One stop occurred on or around South Kedzie Avenue, just south of West 26th Street, in the Little Village neighborhood.

16. CPD officers did not provide any reason for this traffic stop, and I believe it was a pretextual traffic stop.

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

Early 2023 Traffic Stop on South California Avenue

18. CPD officers pulled me over around South California Avenue near West 24th Boulevard, again in the Little Village neighborhood, in approximately the first quarter of 2023.

19. CPD officers did not provide any reason for this traffic stop, and I believe it was a pretextual traffic stop.

20. The officers asked me intrusive and irrelevant questions about where I was coming from and what I was doing. I objected to the officer's invasive line of questioning.

21. After I objected, the officers claimed to smell an odor of cannabis, which I believe they fabricated as a basis to search my vehicle and/or to pressure me to consent to a search.

22. The officers also questioned me about whether I had any weapons in the vehicle. I denied there were any weapons in the vehicle.

23. I stated that I did not consent to a search of my vehicle, but the officers stated that they were going to search my vehicle anyway.

24. The officers demanded that I step out of the vehicle. I complied and one officer made me place my hands on the hood of their police SUV. The officer frisked me and searched inside my fanny pack. Another officer, in the meantime, searched inside my car.

25. The officers did not find or seize any contraband from me or my vehicle.

26. The officers then returned my driver's license and said words to the effect of, "Stay out of trouble."

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

Early 2023 First Traffic Stop on South Pulaski Road

28. CPD officers pulled me over on or near South Pulaski Road, just north of the intersection with 31st Street, in the Little Village neighborhood, in approximately the first quarter of 2023.

29. A CPD officer told me that he pulled me over allegedly for a broken taillight. I believe this was a false or pretextual reason for the traffic stop.

30. The officer asked me whether there were any drugs or weapons in the car. The officer also asked me whether I had a FOID card. I replied that there were no weapons or drugs in the vehicle.

31. The officer stepped away and when he returned, he told me that he allegedly detected an odor of cannabis emanating from my car. I replied that there were no drugs in the car. The officer replied to the effect of: "Well then you don't mind if I search the car, 'cause I won't find anything?"

32. Nervous, anxious, and not wanting to prolong the interaction with the officer, I asked whether I was free to refuse consent. The officer responded that if I did not consent to a search, the officer would call his sergeant and search the car anyway.

33. Feeling like I had no real choice, I told the officer he could search my vehicle.

34. The officer ordered me to step out of the vehicle and led me away from the car. He questioned me about where I was coming from and where I was going.

35. While the first officer questioned me, a second CPD officer searched my vehicle. The officers did not find or seize any contraband from my vehicle

36. They released me without a citation for any alleged violation.

Early 2023 Second Traffic Stop on South Pulaski Road

37. CPD officers stopped me on South Pulaski Road a second time in early 2023. This stop occurred under a viaduct, just north of the intersection with 24th Street, in the Little Village neighborhood.

38. The CPD officers did not tell me why they pulled me over. I believe this was a pretextual traffic stop. The officers checked my ID and the IDs of my two passengers in CPD's database.

39. Then the officers released me and my passengers without a citation for any alleged violation.

40. I continue to drive regularly in the City of Chicago, particularly on the West and South Sides where a majority of the residents are Latino and Black people.

41. I want to serve as a class representative in this lawsuit because I have been deeply affected by the discriminatory pretextual traffic stops that CPD has subjected me to. I have felt humiliated when officers searched my car in front of passersby. I have felt terrorized when approached by officers with their hands on their gun holsters. Interacting with CPD officers places me in fear and causes me to start sweating, shaking and stuttering because I feel targeted and treated as if I am a criminal suspect, even when I know I have done nothing wrong.

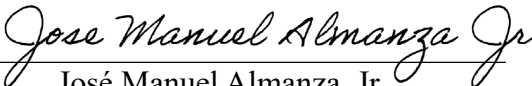
42. My family members and I have been victims of violence in our neighborhood. Nonetheless, we often feel we cannot rely on the police to investigate crimes against us or respond effectively to emergencies, because CPD's frequent discriminatory treatment of us indicates that the police do not care about us.

43. 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.

44. 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 18 day of July 2025.


José Manuel Almanza, Jr.