

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TAMMY KOHR, EUGENE STROMAN, and
JANELLE GIBBS, on behalf of themselves
and all others similarly situated, and
ROBERT COLTON,

Plaintiffs,

v.

CITY OF HOUSTON,

Defendant.

Civil Action No. 17-cv-1473

**DECLARATION OF EUGENE STROMAN IN SUPPORT OF PLAINTIFFS'
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

My name is Eugene Stroman, and I declare:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify to the facts in this declaration under oath if called upon to do so.

2. Houston Police Department officers arrived at the Wheeler encampment today, Tuesday, August 22, shortly after 9:00 AM and harassed encampment residents. There are still officers at both ends of the encampment as of 9:45 AM, and more are showing up.

3. The officers are telling encampment residents to take their tents down, and saying that residents have to move out of the Wheeler encampment. Officers are telling people that if they don't give officers their names and identification, they will be arrested. Officers are also going from tent to tent looking in each person's tent.

4. An officer threatened me directly. He told me that I'm not allowed to leave my tent up. He told me that I need to move out of the Wheeler encampment, and said that I had to be "nomadic."

5. In response to this threat, I told the officer that I had nowhere else to go. He said he understood that, but I still need to take my tent down. I asked the officer how long I had before I would receive a ticket. He told me that I could receive a ticket right now. The officer implied that I was fortunate because he was "trying to be nice." But, the officer warned me, "if you get the wrong officer out here, you'll get citations."

6. I am leaving my tent up.

7. Some encampment residents left without taking their tents down. Officers got in their cars to follow people who left. I also saw officers handcuff an encampment resident and put her in the back of a police car. I'm not sure why she was arrested, but I know that she refused to give officers her identification, because she told me that shortly before officers took her away.

I declare under penalty of perjury under the laws of the United States of America and laws of the State of Texas that the foregoing is true and correct to the best of my knowledge.

Executed this 22nd day of August, 2017, in Houston, Texas.

/s/ Eugene Stroman
Eugene Stroman