

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA**

ANNE WHITE HAT, RAMON MEJÍA,
and KAREN SAVAGE,

Plaintiffs,

v.

Civil Action No. 6:20-cv-00983

BECKET BREAUX, in his official
capacity as Sheriff of St. Martin Parish;
BO DUHÉ, in his official capacity as District
Attorney of the 16th Judicial District Attorney's
Office,

JUDGE ROBERT R. SUMMERHAYS

MAGISTRATE JUDGE
CAROL B. WHITEHURST

Defendants.

X

DECLARATION

I, ANNE ROLFES, declare and state as follows:

1. I am the Director of the Louisiana Bucket Brigade, a non-profit health and justice organization based in New Orleans that works with communities in Louisiana located near oil refineries and chemical plants, which are often predominantly Black communities.

2. The Bucket Brigade has members and partner organizations who frequently exercise their First Amendment rights to document, advocate, educate about, and protest against, environmental injustices, including pipeline projects.

3. Members, volunteers, and staff of the Bucket Brigade publicly opposed and peacefully demonstrated against the Bayou Bridge Pipeline, a controversial and high-profile pipeline project.

4. Bucket Brigade staff also reported live and frequently filmed activities, interviews with experts, community members, and activists, at or near pipeline construction sites and have been at times threatened by pipeline security personnel and law enforcement.

5. Part of the Bucket Brigade's work involves training and assisting communities in getting air quality samples, as well as monitoring projects like pipeline construction for adherence to regulatory and permit requirements.

6. The Bucket Brigade also does filming and interviews on location in neighborhoods and communities where there are pipelines that are part of the petrochemical infrastructure.

7. Our work necessarily brings us within the vicinity of pipelines. The vagueness and open-ended language of the law means that we and our members cannot be certain where we can be and when we can be there.

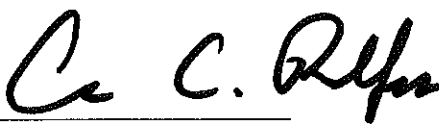
8. Our work and political advocacy have been directly impacted by the amendment to La. R.S. 14:61 as it severely increases the punishment for presence on or near pipelines and our members, especially those in the communities most affected in which we work, are concerned about the possibility of arrests and felony charges.

9. Our members and staff are concerned about the possibility of arrests and felony charges, not only for their protest and expressive conduct but also for their work monitoring and documenting violations.

10. As a result, we have had to explore with our staff, volunteers, members and community partners other ways to document corporate violations and failures by state agencies to oversee such projects and to give voice to those who stand to be most affected by them.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 15, 2022


ANNE ROLFES