

SECOND DECLARATION OF JOHN MANCINI

My name is John Mancini, and I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I declare the following:

1. Although I receive some veteran's compensation because I am a disabled veteran, I depend on panhandling as a necessary part of my income.
2. I am a named plaintiff in the lawsuit Mancini v. Cleveland. Since I need the income from panhandling, I have tried to keep doing it, even though the lawsuit is not resolved yet, and the police have continued to harass me and threaten me with jail.
3. However, the threats have suddenly reached a new level. The police have escalated by following me, detaining me, and intimidating me specifically because I filed my lawsuit.
4. Yesterday, in the early afternoon (Saturday, March 11, 2017), an extremely cold winter day, I went out panhandling on Euclid Avenue along the north side of the block between 14th and 17th. I started by sitting with my sign by the Starbucks on Euclid and 14th, because there was sun there and it was warmer to sit in the sunshine. As the afternoon went on, I moved eastward on the block a couple of times in order to stay in the sun. After a while the sun didn't reach any area to sit, so I moved to where there were more people, in front of Moko Coffee Restaurant at 1505 Euclid. Moko is closed on Saturdays, but people were walking by there.
5. At about 2:00 pm, the Cleveland police officer who usually harasses me, Officer Jordan, with a partner I didn't recognize, drove by in a police car. I could see that they saw me; Officer Jordan pointed at me. This made me afraid because Officer Jordan had threatened me with jail on four occasions previously.

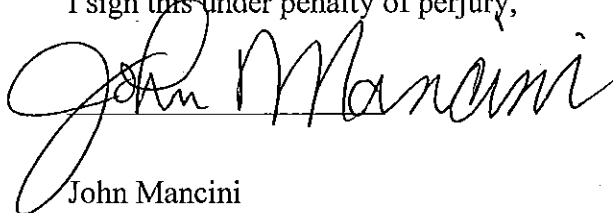
6. Out of fear of being arrested, I immediately got up to go home. I walked through the parking lot across the street, turned right on Brownell Court, and turned South on 14th Street towards the bus stop at 14th and Erie Court to catch the bus home.
7. Officer Jordan and his partner followed me in their car and then drove past me. I lost sight of them when I cut through the parking lot, but when I got to 14th and Prospect, I saw their car waiting for me on Bolivar one block west, right near the bus stop where I had been headed.
8. Officer Jordan (who was in the passenger seat) called me over to the car. I was very frightened, but felt I had no choice but to obey, so I walked over to the passenger door.
9. Officer Jordan said to me, "So, you filed a lawsuit claiming you're being harassed, huh?"
10. I didn't know how I should answer, so I said nothing.
11. He continued, "does the ACLU know you're sitting in front of the Playhouse?"
12. I didn't feel comfortable talking with him about my conversations with my lawyers, but since he had threatened to arrest me several times before, I felt I couldn't walk away, and that I had to answer. What I said was, "the ACLU knows I panhandle all along Euclid Avenue."
13. Officer Jordan persisted, "but do they know you were sitting right in front of the Playhouse?"
14. Again, I didn't feel right about talking with him about the lawsuit, or my conversations with my lawyers, but I felt I needed to answer him so I said, "I wasn't in front the Playhouse, I was in front of a closed business."
15. He stopped questioning me then but I was so shaken up and felt so intimidated, and I wanted to get away so quickly, that I actually got on wrong bus. I hurriedly jumped onto

the #90 rather than the #15, and I ended up three miles from home – in Garfield Heights.

So I had to walk an hour in the bitter cold to get home.

16. I am even more afraid of panhandling in Cleveland now, because the police are acting angry that I filed my lawsuit. They are stalking and harassing me to intimidate me. I feel they are retaliating against me.

I sign this under penalty of perjury,

A handwritten signature in cursive script that reads "John Mancini". The signature is written in black ink and is positioned above the printed name.

John Mancini