

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVID FLOYD, *et al.*,

08 Civ. 1034 (AT)

Plaintiffs,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

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KELTON DAVIS, *et al.*,

10 Civ. 699 (AT)

Plaintiffs,

-against-

CITY OF NEW YORK, *et al.*,

Defendants.

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**DECLARATION OF DARIUS CHARNEY IN SUPPORT OF
PLAINTIFFS' MOTION TO MODIFY THE *FLOYD* REMEDIAL ORDER**

DARIUS CHARNEY, an attorney duly authorized to practice in the courts of New York and in this Court, declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a senior staff attorney at the Center for Constitutional Rights and counsel for Plaintiffs in *Floyd v. City of New York*, 08 Civ. 1034 (AT). I submit this Declaration in support of *Floyd* and *Davis* Plaintiffs' Motion to Modify the *Floyd* Remedial Order, *Floyd* ECF No. 372, as modified by the Court's July 30, 2014 Order, *Floyd* ECF No. 466.

2. Attached hereto as Exhibit 1 is the Declaration of Carolyn Martinez-Class on behalf of Communities United for Police Reform.

3. Attached hereto as Exhibit 2 is the Declaration of Sala Cyril on behalf of the Malcom X Grassroots Movement.

4. Attached hereto as Exhibit 3 is the Declaration of Lloyda Colon on behalf of the Justice Committee

5. Attached hereto as Exhibit 4 is the Declaration of Kesi Foster on behalf of Make the Road New York.

6. Attached hereto as Exhibit 5 is the Declaration of New York City Public Advocate Jumaane Williams.

7. Attached hereto as Exhibit 6 is a true and correct copy of *Floyd and Davis* Plaintiffs' March 18, 2019 Letter to the Court-Appointed Monitor Peter Zimroth

8. Attached hereto as Exhibit 7 is a true and correct copy of *Floyd and Davis* Plaintiffs' July 22, 2019 Memorandum to the Court-Appointed Monitor Peter Zimroth.

9. Attached hereto as Exhibit 8 are true and correct copies of the final report and survey results tables from the New York Civil Liberties Union's (NYCLU) and City University of New York (CUNY) Public Science Project's 2016-2017 community survey of New York City residents regarding their experiences with NYPD investigative encounters.

Dated: New York, NY
July 29, 2021

\s\ Darius Charney