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8 Attorneys for Plaintiffs,
9 KEITH H. WASHINGTON,
10 SAN FRANCISCO BAY VIEW
11 NATIONAL BLACK NEWSPAPER

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 WASHINGTON, KEITH H. and SAN
15 FRANCISCO BAY VIEW NATIONAL
16 BLACK NEWSPAPER,

17 Plaintiffs,

18 vs.

19 FEDERAL BUREAU OF PRISONS, GEO
20 CALIFORNIA, INC., MONICA HOOK,
21 MARIA RICHARD and WILL GOMEZ,

22 Defendants.

Case No.:

**DECLARATION OF ALEXIS
TERRAZAS IN SUPPORT OF
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
PLAINTIFFS' APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER AND/OR ORDER TO SHOW
CAUSE AND FOR PRELIMINARY
INJUNCTION**

23 I, Alexis Terrazas, hereby declare:

24 1. I have personal knowledge of the matters stated in this Declaration, and
25 if called and sworn as a witness in this matter, I could and would competently testify
26 thereto.

27 2. I am the editor of a San Francisco-based community newspaper, El
28 Tecolote. El Tecolote began as a project in a La Raza studies class at San Francisco
State University on August 24, 1970, at a time when Latinos and other people of

1 color were virtually invisible in the major newsrooms. Today, El Tecolote is a
2 biweekly publication with a circulation of 10,000. It is the longest running
3 Spanish/English bilingual newspaper in California.

4 3. I first learnt of Keith “Malik” Washington through Mary Ratcliff, who for
5 years has been the editor and driving force behind the San Francisco Bay View, the
6 premier national Black newspaper.

7 4. As the editor of a fellow San Francisco-based community newspaper,
8 Mary reached out to me in anticipation of Malik’s release and transition to being the
9 Bay View’s new editor in September 2020.

10 5. El Tecolote purchased Malik a subscription to our newspaper, suggested
11 journalism reading material, and we began a correspondence with each other.

12 6. Malik and I collaborated closely on a fundraiser for the SF Bay View in
13 October 2020.

14 7. Over time, our collaboration developed to the point where we were in
15 contact over the phone at least once a week. We worked on story ideas, fundraising
16 and ideas for wider collaboration for journalists of color and outreach to the
17 community.

18 8. We began working on a project we dubbed “The Black and Brown Media
19 Consortium”. The Black and Brown Media Consortium is a partnership between our
20 two publications where the SF Bay View and El Tecolote will use our story-telling
21 capacities to explore the effects that COVID-19, systemic racism, police brutality and
22 other issues have on our collective communities in San Francisco and Oakland.

23 9. The Black and Brown Media Consortium collaborates to develop story
24 ideas, which are then assigned to journalists in the consortium. The stories can then
25 be edited and published in El Tecolote and the SF Bay View, subject to the editorial
26 decision-making of each individual paper.

27 10. The Black and Brown Media Consortium is also creating audio stories for
28 a podcast, Radio Teco, which we anticipate will go live in late February or March of

1 2021. At the time of the retaliation against Malik in January, the SF Bay View was
2 also considering creating a podcast through the Consortium.

3 11. Prior to the retaliation against Malik for exposing the COVID outbreak at
4 the Taylor Street Facility, the Black and Brown Media Consortium was meeting once
5 a week.

6 12. Since the retaliation against Malik and the imposition of the ban on
7 Malik for speaking with the press, we do not know whether Malik would be retaliated
8 against for communicating with me or the Black and Brown Media Consortium.

9 13. The retaliation against Malik was for communication with a journalist
10 such as myself. I do not know if communications with Malik would subject him to
11 similar retaliation from the Taylor Street Center.

12 14. The Black and Brown Media Consortium has not held any meetings since
13 the retaliation against Malik on January 10, 2021.

14 15. We do not know if we can hold any further meetings because of the ban
15 imposed on his press contacts.

16
17 I declare under penalty of perjury that the foregoing is true and correct, except
18 as to those matters stated on information and belief, and as to those matters I believe
19 them to be true. Executed on February 1, 2021 in San Francisco, California.

20
21 Signed: Alexis Terrazas*
22 Alexis Terrazas

23
24 * I, Richard Tan, am the ECF user whose identification and password are
25 being used to file the foregoing documents. Pursuant to Civil Local Rule 5.1(i), I
26 hereby attest that concurrence in the filing of these documents has been obtained
27 from each of its signatories.