

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ELIZABETH GOODWIN, Administrator of the Estate of Tanisha Anderson, Deceased	:	Case No. 1:15-cv-0027
	:	
	:	Judge Donald C. Nugent
	:	
Plaintiff,	:	Magistrate Kenneth S. McHargh
v.	:	
	:	
CITY OF CLEVELAND, et al.	:	
	:	
Defendants.	:	

I, Joell Anderson, pursuant to 28 U.S.C. §1746, declare under the penalty of perjury under the laws of the United States of America that the following is true and correct.

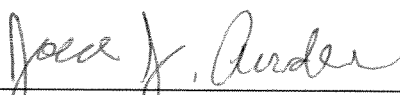
1. My name is Joell Anderson. I am the brother of Tanisha Anderson, deceased.
2. Our family has filed the above civil rights and wrongful death action.
3. On November 12, 2014 my sister was having a mental health crisis. She had recently been discharged from the mental hospital and needed to return there to be stabilized.
4. We called 911 for help. We asked for an ambulance but police responded.
5. One pair of officers responded and talked to Tanisha and she appeared to settle down. We called for help a second time after she started leaving the house and acting disoriented.
6. The second set of officers arrived and used force on her, attempting to push her into the zone car and eventually taking her to the sidewalk and leaving her there cold, face down and not breathing. They provided no treatment and delayed calling EMS for up to twenty minutes, falsely claiming my sister was breathing and safe.

7. I explained the facts in detail to the Cleveland Police investigating Tanisha's death. That was on November 13, 2014.
8. I explained the facts in detail again when I learned that the investigation was being redone by the Cuyahoga County Sheriff's office. That was on October 21, 2015.
9. Our attorneys secured notes of my first interview with the Cleveland Police during the course of this case.
10. We have now learned that the criminal investigation has been transferred to the Ohio Attorney General.
11. We have been told that the County investigation is "tainted" because it includes access to information learned from the officers.
12. This is very frustrating for our whole family. My mother – Tanisha's mother – is very upset with the delays and the errors. It looks like a big effort to protect the officers. It looks like what we saw in the Edward Henderson case and the Tamir Rice case. It feels like a cover-up.
13. We know that we will be asked again to tell investigators what we saw either in round three of the criminal investigation or in this case.
14. Our lawyers simply subpoenaed our own statements. That is the statements of Cassandra Johnson, Theresa Overton, Joell Anderson, Andrew Connard, Jacob Johnson and Mauvion Green. All of these eyewitnesses to Tanisha's death are family except for Andrew Connard who is a dear friend of the family and is treated like family.
15. This investigation has dragged on for 17 months and we are nowhere. Meanwhile every few months we are asked again to say what we saw and heard and the police get to say nothing, waiting to cross examine us and nitpick our statements.

16. It is only fair for us to see and hear the statements we have previously made just to stay fresh on details and avoid unfair cross examination in this civil rights and wrongful death case or in a future criminal case against the officers.

17. Blocking us from access to our own statements makes us feel like we are the criminals.

That's not right.


Joel Anderson

Dated: 4-6-2016