

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BARBARA HANDSCHU, RALPH DIGIA,  
ALEX McKEIVER, SHABA OM, CURTIS :  
M. POWELL, ABBIE HOFFMAN, MARK :  
A. SEGAL, MICHAEL ZUMOFF, :  
KENNETH THOMAS, ROBERT RUSCH, :  
ANETTE T. RUBENSTEIN, MICHEY :  
SHERIDAN, JOE SUCHER, STEVEN :  
FISCHLER, HOWARD BLATT and :  
ELLIE BENZONE, on behalf of themselves :  
and all others similarly situated, :

71 Civ. 2203 (CSH)

Plaintiffs, :

-against-

SPECIAL SERVICES DIVISION, a/k/a :  
BUREAU OF SPECIAL SERVICES, :  
WILLIAM H.T. SMITH, ARTHUR :  
GRUBERT, MICHAEL WILLIS, :  
WILLIAM KNAPP, PATRICK :  
MURPHY, POLICE DEPARTMENT :  
OF THE CITY OF NEW YORK, :  
JOHN V. LINDSAY and various unknown :  
employees of the Police Department acting :  
as under-cover operators and informers, :

Defendants. :

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LINDA SARSOOR, for her declaration pursuant to 28 U.S.C. sec. 1746, states as

follows:

1. I am the executive director of the Arab American Association of New York,  
located at 7111 Fifth Avenue in Brooklyn. The Arab American Association of New York  
is a non-profit social service and advocacy organization serving the Arab immigrant and  
Arab-American community in New York City. I make this statement to explain some of

the effects that the awareness of systematic police surveillance has had on me and on members of the Muslim community with whom my organization works.

2. I am constantly aware that my organization and Muslim institutions are subject to infiltration by informers. In January of 2011, a man came to my office who claimed to be a Palestinian; he was vague about his immigration status. He asked about the political orientation of the organization. He asked about our youth program, and in connection with that he asked if the program was a "deradicalization" program. I decided that he was probably a police informant and declined to discuss these things with him.

3. As a result of this and similar experiences, and reports of police infiltration in the community, I am suspicious of persons who volunteer to work for my organization. I feel that we cannot just accept persons who volunteer at face value, but we must investigate to be sure that they are in good faith. My organization has an associate director who speaks Arabic but is not Muslim. Two months ago he interviewed a man in his twenties who said he was Egyptian; he was well-dressed and spoke Arabic. He said that he was willing to work with us as a volunteer, and said he could work at any time and had plenty of time available. I had to caution the associate director that we needed to get a written application from this man and inquire into his background before we could accept his help. I am informed that other organizations that work with Muslims are similarly suspicious of volunteers.

4. People in the community experience a generalized suspicion of persons they do not know, that they might turn out to be informants. At a recent celebration of the end of Ramadan, held at the Dyker Beach Golf Course in Brooklyn, uniformed police were

present, representatives of the office of community affairs. A man from the community asked me why they were there, and I explained that relations with the local police are cooperative and friendly. The man said that when he is at the Mosque, he does not know who is praying there. He said, "I don't know whether the guy praying next to me is an informer or not." I told him I could not reassure him that people in the Mosque might not be informers.

5. Recently my organization held a community conversation, hosted jointly with the Council on American-Islamic Relations (CAIR), concerning problems of police surveillance and law enforcement. One question that was raised was "What do you think of when you think of the police?" One young woman drew a picture of a large eye and explained it by saying, "When I think of the New York police, I think of a person watching every move I make." A girl student said she was confused, because she no longer knew whether the police were there to protect her or not. There was discussion of Shamiur Rahman, who had just recently been revealed as a police informer.. One young man said that he had spent time hanging out with Rahman, and he felt betrayed by him.

6. There is suspicion in Muslim Student Associations (MSA's) as well. At Hunter College, outside the door to the office of the MSA, there is a sign that says, "Please refrain from political convos in the MSA. Read this to see why." The sign had arrows that pointed to an article about NYPD surveillance by Len Levitt.

7. In short, the awareness of police surveillance has produced suspicion as between people in the community, has produced caution and suspicion in organization, and a sense of being watched constantly by the authorities.

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

Executed on

January 18<sup>th</sup>

2013

A handwritten signature in black ink, appearing to read "Linda Sarsour". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Linda Sarsour