

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARVIN WASHINGTON, DEAN BORTELL,
as Parent of Infant ALEXIS BORTELL;
JOSE BELEN; SEBASTIEN COTTE,
as Parent of Infant JAGGER COTTE;
and CANNABIS CULTURAL ASSOCIATION, INC.,
Plaintiffs,

X

- Against -

AFFIDAVIT

JEFFERSON BEAUREGARD SESSIONS, III,
in his official capacity as United States Attorney General;
UNITED STATES DEPARTMENT OF JUSTICE;
CHARLES "CHUCK" ROSENBERG, in his
official capacity as the Acting Director of the Drug
Enforcement Administration;
UNITED STATES DRUG ENFORCEMENT
ADMINISTRATION; and the
UNITED STATES OF AMERICA,

Defendants.

X

State of New York)
 :ss:
County of New York)

THOMAS MOTLEY hereby declares under the penalties of perjury that the following facts are true:

1. I am a 43 year-old, African American male;
2. I was indicted in the Southern District of New York with a marijuana cultivation and distribution conspiracy involving in excess of 100 marijuana plants;
3. I pled guilty, pursuant to a plea agreement. Thereafter, I was sentenced below the Sentencing Guidelines to two concurrent six month terms of imprisonment, to be followed by a three-year term of supervised release;

4. For nearly thirty years, I have believed that the drug laws, including the marijuana laws, are enforced more stringently and unequally against people of color. This belief was reinforced by the numerous people whom I met while in federal custody, nearly all of whom were people of color and many of whom were serving five and ten year mandatory minimum sentences;

5. I am currently self-employed as a contractor. I also have a t-shirt company, "Thank God for Life," which for the past three years has organized toy and clothing drives in Harlem, donating those items to inner city youth.

6. I have never pursued any type of minority owned business loan or grant, because I believe that my conviction will render me ineligible for these programs. I also know that my ability to travel is limited because of my marijuana conviction.

7. I am a member of the Cannabis Cultural Association.

Dated: November 27, 2017
New York, New York


THOMAS MOTLEY

Sworn to before me
this 27th day of November 2017
Seyla Reich

SHERYLE E. REICH
NOTARY PUBLIC, State of New York
No. 31-4697834
Qualified in New York County
Commission Expires 6/30/2018