

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

INTERNATIONAL WOMEN'S DAY MARCH)	
PLANNING COMMITTEE , an unincorporated)	
association, and SAN ANTONIO FREE SPEECH)	
COALITION , an unincorporated association,)	
)	
Plaintiffs,)	Civil Action No. SA-07-CA-0971-XR
vs.)	
CITY OF SAN ANTONIO,)	
Defendant.)	

AFFIDAVIT OF GLORIA A. RAMÍREZ

1. My name is Gloria A. Ramírez. I am a member of the San Antonio Free Speech Coalition. My address is 214 Riddle, San Antonio, Texas, 78210. My date of birth is May 4, 1950.

2. I earned a Bachelor of Arts and Master of Arts degree at the University of Texas at Austin. I retired in 2004, after 31 years as a teacher, most of which I worked as a Bilingual Educator for the Edgewood Independent School District. In 1998, I received the Edgewood Teacher of the Year Award and was one of San Antonio's distinguished educators chosen to receive a teaching excellence award from Trinity University.

3. Over the past several days, I have reviewed the records of Parade Permit and Walk-Run Permits issued over the period from 2003 through 2007 produced in this litigation by the San Antonio Police Department through the City Attorney. These documents are organized in packets, with the first page of most being the Police Department's Application for Permit Form. The one-page form indicates the length of the march or parade, the number of anticipated participants, and other information. In a "Remarks" section, the form usually indicates whether traffic control will be provided by the San Antonio Police Department, the Bexar County Sheriff's Office or some other agency or individual. The Form also indicates whether Traffic Barricades will be required. The packets for those events with traffic control performed by the San Antonio Police Department generally contain further information about the approximate number of police officers that will be required for the event and the

estimated cost for these officers. The packets for other events do not include this information. None of the packets include information about the costs of traffic control devices or about clean-up costs.

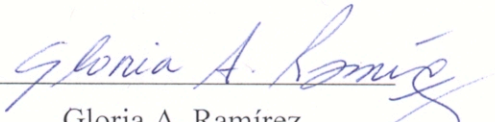
4. The number of officers assigned to marches and parades and the costs charged to the permit holders varies enormously, and this variation is only vaguely related to the length of the march, day of the week, or the time of the day. On a Saturday afternoon in March, 2005, the St. Patrick's Day Parade marches for one mile on downtown streets with an estimated 4,000 people: the San Antonio Police Department assigns 33 officers, 20 on-duty (costing \$2,828.18) and 13 off-duty (costing \$2,791.43) for a total police cost of \$5,619.61. The permit holder paid the full amount. On a Sunday afternoon in May 2005, the Eucharistic Adoration of San Antonio held a one mile procession, with an estimated 300 people, that used one lane of the streets from North St. Mary's to San Fernando Cathedral: 13 on-duty officers were scheduled and 1 off-duty officer, for a total police cost of \$954.83. On a Sunday afternoon in August 2005, the Eucharistic Adoration of San Antonio held a 2.5 mile procession, for an estimated 300 people, again ending at San Fernando Cathedral: 5 on-duty and no off-duty officers were assigned, for a total police cost of \$303.38. The permit-holder was not charged for any of these costs. In between, in June 2005, on a Sunday morning, the Government Finance Officers Association held a 3.1 mile event with 100 participants: the SAPD assigned 12 on-duty officers (\$1,027.18) and 1 off-duty officer (\$161.49). the permit-holder was charged only \$161.49.
5. In 2006, Cesar Chavez March, with an estimated 12,000 participants, covered 2.6 miles on a Saturday afternoon. The police cost (52 officers – 23 on-duty, 29 off-duty) was \$5,819.95. The permit-holder was charged nothing because of an existing Ordinance. In April 2006, for an Immigration March, with 5,000 participants, and a 1 mile route, the SAPD Traffic Lieutenant assigned 68 officers (33 on-duty, 35 off-duty) for a total police cost of \$7,829.63, of which the permit-holder was charged \$4,862.40 (the cost for off-duty officers only). Then on September 11, 2006, the 9-11 March is held on 1 mile of downtown streets in the middle of rush hour, from 7 to 9 am on a Monday: 28 on-duty officers are assigned to the March, costing \$2,655.40. The permit-holder is charged only \$864.38, which is described as the cost

for “overtime police officers.”

6. In October 2006, an interesting thing happened. One application was submitted for a 3 mile Immigration March on Thursday, October 12, from 4 to 8 pm: SAPD said that 54 officers would be needed (23 on-duty and 31 off-duty) for a total police cost of \$9,091.54. This application was rejected because the applicant had not paid for the amount charged to him for the April 2006 Immigration March. Eight days later another applicant submitted an identical application: SAPD said that only 24 officers would be needed, for a total cost of \$3,305.91. The paperwork includes a handwritten note saying: “Per Chief McManus conversation with Captain Ralonis on 10/12/06 assist this event with resources.”
7. The International Women’s Day March traveled the same approximately 1 mile route in March 2003 and March 2004. One year 16 on-duty and 13 off-duty officers were assigned and the next year 10 on-duty and 25 off-duty officers were assigned.
8. Throughout the five years, police services for Rodeo, Fiesta, Blue Santa, S.A. Marathon and Spurs events were apparently performed without charge to permit-holders. In addition numerous application packets indicated a waiver of police and other costs, including the San Fernando Good Friday Procession (apparently waived by City Staff), the ADA March (apparently waived by the Mayor); many indicated the provision of police services for free by off-duty police officers, constables, park police or others; many indicated that more (less expensive) on-duty officers were assigned to some events and not to others; and many included partial charges, such as charging only for over-time officers.
9. Finally, none of the permit applications that I have reviewed makes any mention of a distinction between police traffic control functions and police protection or security functions.
10. The Permit Application Packets relevant to the above-described examples are attached hereto.


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

Executed this 28th day of January, 2008


Gloria A. Ramirez

STATE OF TEXAS §
COUNTY OF BEXAR §

BEFORE ME, the undersigned authority, personally appeared Gloria A. Ramirez, who stated, upon oath, that the statements made in the foregoing affidavit are within her personal knowledge and are true and correct.


Notary Public, State of Texas

