

DECLARATION OF SANDRA HUDSON

I, Sandra Hudson, declare as follows:

1. Unless otherwise indicated, I have personal knowledge of the matters set forth in this declaration, and could and would competently testify to such matters if called upon to do so.

2. In or around September 2020, Black Lives Matter Grassroots (“BLMGR”) was publicly announced as a concept. Melina Abdullah (“Abdullah”) and I served as the co-directors of BLMGR. As such, when Defendant Black Lives Matter Global Network, Inc. (“BLM GNF”) was incorporated as a 501(c)(3) organization on or around October 16, 2017, BLMGR neither existed as an informal entity with co-directors nor as a formal 501(c)(3) organization. Plaintiff Black Lives Matter Grassroots, Inc. (“BLM Grassroots or Plaintiff”) also did not exist in 2017 as an informal entity with co-directors nor as a formal 501(c)(3) organization.

3. After it was announced as a concept in September 2020, BLMGR was initially led by a leadership team we called the “Steering Committee,” the members of which (including Abdullah) did not serve in their leadership roles for free. Instead, on January 3, 2021, the BLMGR Steering Committee approved receiving at least \$5,000 a month per person for serving on the Steering Committee. The following individuals served on the Steering Committee when it was first created: Abdullah (Co-Director), myself (Co-Director), Dawn Modkins (“Modkins”) (Director of Chapter Intake and Participation); Angela Waters Austin (“Austin”) (Director of Operations and Finance); Karlene Griffiths Sekou (“Sekou”) (Director of Healing, Justice, and International Partnership); Jordan Giger (“Giger”) (Director of Political Outreach); and Audrena Redmond (“Redmond”) (Director of Political Education). I was not personally selected by Melina Abdullah to be on the BLMGR Steering Committee, but rather I was selected by Patrisse Cullors to join the committee. During my tenure on the BLMGR Steering Committee from approximately September 2020 to approximately February 2022, BLMGR was not a formally registered entity or an organization with 501(c)(3) status. Plaintiff or BLM Grassroots also was not a formally registered entity or an organization with 501(c)(3) status during my tenure on the BLMGR Steering Committee from approximately September 2020 to approximately February 2022.

4. At all relevant times, BLMGR had its own Instagram social media account with the handle, “blmgrassroots.” At all relevant times, BLMGR had its own Twitter social media account with the handle

“@blmgrassroots.” It was always my understanding that BLM GNF had its own social media accounts, including (1) its own Instagram social media account with the handle “blklivesmatter,” which boasts over 4 million followers the last time I checked the account; (2) its own Twitter social media account with the handle “Blklivesmatter,” which has over 1 million Twitter followers the last time I checked the account; and (3) its own Facebook page, BLKLIVESMATTER, which has 788,000 Facebook followers the last time I checked the page.

5. Several members of the BLMGR Steering Committee, including Melina Abdullah, wanted BLMGR to utilize BLMGR’s own social media accounts instead of sharing content on BLMGNF’s social media accounts. I personally was against BLMGR using its own social media accounts, as I preferred instead that BLMGR share its content on the BLM GNF account by asking permission from BLM GNF to use its accounts.

6. On or around January 9, 2022, Abdullah and other BLMGR representatives held a meeting. In advance of this meeting, there was no notice given that the BLMGR Steering Committee was considering for approval at the meeting an approximate budget transfer of \$7 million from the Collective Action Fund, held by the Tides Foundation, to One Love Global on behalf of BLMGR. Melina Abdullah refused to even allow me to attend this meeting. The BLMGR budget included increased payments of \$100,000 annually specifically for Abdullah, Austin, Sekou, and Redmond.

7. On January 17, 2022, I prepared and sent a letter to BLM GNF leadership and the Tides Foundation expressing my concerns over any plan to potentially dissolve BLM GNF and turn over its assets to BLMGR. On or around February 12, 2022, after I sent my January 17, 2022 letter to BLM GNF and the Tides Foundation, I learned that I was officially removed from the BLMGR Steering Committee. Attached hereto as **Exhibit 1** is a true and correct copy of my January 17, 2022 letter.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 1st day of November 2022 at Los Angeles, California.

By: 
Sandra Hudson