

1 **Declaration of Alex Alonso**

2 I, Alex Alonso, hereby declare that I am an expert on the subject of street gangs in general and
3 regarding the Crips and the Bloods in South Central Los Angeles in particular. If called as a witness, I
4 would testify competently to the following of my own personal knowledge, or where stated, on my
5 information and belief as to those matters I believe them to be true.

6 1. My expertise is based on academic studies in the area of urban and human geography,
7 conducting ethnographic research, which includes interviews, doing participant observations and
8 comparing that data to pre-existing literature on the subject.

9 2. I am currently a doctoral student at the USC Department of Geography where I am
10 writing a dissertation on the history and geography of gang injunctions in Los Angeles. My master's
11 thesis research was completed in May 1999, and as requirement I completed a thesis entitled
12 Territoriality Among African American Street Gangs in Los Angeles where I examined the expansion
13 of Los Angeles gangs from 1972 - 1996. In researching and compiling the information for this thesis,
14 I have spent several hundred hours interviewing dozens of people who have historical knowledge of
15 gangs in Los Angeles County, have visited every black gang neighborhood in Los Angeles, and have
16 digitally mapped every black gang in the County, including the Bounty Hunter Bloods and The
17 Eleven-Eight East Coast Crips. I have also lived in South Los Angeles for nearly 10-years, have
18 attended Susan Miller Dorsey High school in South Los Angeles and have attended the University of
19 Southern California that has always kept me close to my studies on gangs.

20 3. I am familiar with most of Los Angeles street gangs presently active in the South Los
21 Angeles area, including gang vernacular, clothing styles, hand signs, graffiti, rivalries, tattoos,
22 structure, mannerisms, criminal activities, as well as the common means of violence employed by
23 gang members in the course of engaging in criminal activity.

1 4. I have testified as a gang expert and have consulted attorneys in nearly 100 cases in Los
2 Angeles County, Orange County, Ventura County, Kern County and San Bernardino County.

3 5. I have published articles in peer-reviewed journals and for magazines on the topic of
4 gangs in Los Angeles. Below are a list of some of those publications:

5 a. Rise of the Bloods in LA, 2006, *The Source Magazine*, Vol. 205: 82-87.

6
7 b. Spatial Segregation of the Poor in Southern California: A Multi Dimensional Analysis, 2005,
8 *Urban Geography*. Vol. 26: 587-609.

9
10 d. Racialized Identities and the Formation of Black Street Gangs in Los Angeles, 2004, *Urban*
11 *Geography*. Vol. 25: 658-674.

12
13 e. *An Analysis of the Southern California Region*, Working Paper, 2001, Department of
14 Geography, University of Southern California

15
16 f. Gang Graffiti, Boundaries of Territories, and Homicides in Los Angeles, 2001, In T. L.
17 McKnight, *Regional Geography of the United States and Canada: 3rd Edition*, Upper Saddle
18 River: NJ: Prentice Hall, 398-399.

19
20 I have also been cited in several newspapers and quoted by news agencies including the *Los*
21 *Angeles Times*, *Los Angeles Daily News*, *Washington Post*, *Associated Press* and *Reuters*.

22
23 6. In rendering my opinions below, I have relied upon my own education, training, and
24 experiences. I have also reviewed and relied upon the deposition testimony of Los Angeles Police
25 Detective Christopher Barling, a court certified gang expert and one of the officers assigned to
26 investigate the murder of Joseph Randall; the deposition testimony of KDAY radio personality Julio
27 Gonzalez; the deposition testimony of KDAY radio personality Damien Mijares; the deposition
28 testimony of Watts Labor Community Action Committee (hereinafter "WLCAC") security guards
29 Mart Biggers, Billy Titus and Larry Maxent; the deposition testimony of WLCAC President Timothy
30 Watkins; the deposition testimony of WSF, Inc., President Tommy Jacquette; excerpts of the
31 deposition testimony of KDAY radio personality Yolanda Whitaker; excerpts of the deposition
32 testimony of Pamela Garrett, President of the Board of Directors of the Watts Summer Festival

1 (hereinafter “WSF”); excerpts of the deposition testimony of Tina Watkins, WLCAC General
2 Manager of Development; the deposition testimony of Janine Watkins, the wife of Timothy Watkins;
3 as well as various internet sites pertaining to Young Dre and his music, including the My Space.Com
4 internet site of Young Dre and YouTube.com.

5 7. For the sake of brevity, my findings and opinions set forth in this declaration are
6 inclusive of the specific issues raised by Defendant Watts Summer Festival, Inc., Defendant Tommy
7 Jacquette, Spanish Broadcasting System Southwest, Inc. and Styles Media Group, LLC in their
8 motions for summary judgment.

9 **OVERALL OPINIONS**

10 8. In overall summary and based upon my education, training, experience, and my review
11 the records, internet research and documents mentioned above, it is my expert opinion within a clear
12 and convincing degree of certainty that:

- 13 A. The Nickerson Gardens public housing development (hereinafter “Nickerson Gardens”),
14 located approximately one block from the WLCAC headquarters at 10950 South Central
15 Avenue, in the City of Los Angeles is a high violent crime location and is commonly
16 known in the community to have recurrent problems relating to the sale and use of illegal
17 narcotics, shooting at police officers, assaults with deadly weapons, robberies and vehicle
18 thefts;
- 19 B. Nickerson Gardens and the adjacent WLCAC headquarters are located in an area known
20 as a “Bounty Hunter Blood” gang controlled territory;
- 21 C. Gang graffiti in the area surrounding Nickerson Gardens and the WLCAC headquarters
22 is consistent with Bounty Hunter Blood gang graffiti and is abundant and readily
23 apparent upon a casual visual inspection;
- 24 D. “Crip” gangs and “Blood” gangs are natural rivals;

- 1 E. Individual respect and respect for the gang with which they are affiliated are very
2 important and a significant part of the gang culture of which a gang member is involved
3 with;
- 4 F. While Crip and Blood gang members can co-exist at a location without necessarily
5 engaging in violence towards each other, some type of reaction, including acts of
6 retaliation involving serious injury and death can be expected if “Crip” and “Blood” gang
7 members were both present at a location and if one or more members of either gang made
8 verbal statements or visual gestures that are disrespectful of the other group. Those
9 visual gestures can include the “throwing” of gang signs and gang behaviors and
10 mannerisms which are often considered aggressive threats and constitutes acts of
11 disrespect and provocation;
- 12 G. Throughout the country, cities and counties have banned hip-hop concerts due to the
13 propensity for gang related violence, including serious injury and death to attendees. The
14 propensity for violence at hip-hop concerts is partially attributable to the well-known fact
15 that performers and attendees often include gang-affiliated individuals and rival gang
16 members. Occurrences of violence, injury and death at hip-hop concerts is so pervasive
17 that the hip-hop industry, including rap artists and producers have undertaken
18 considerable efforts to stem the likelihood of violence to enable them to earn a living
19 performing at concerts;
- 20 H. The previously unannounced presence of a hardcore gangster Crip-affiliated rapper-
21 Young Dre and the 30-40 members of his “crew” on stage dressed in blue and white
22 “Crip” gang colors in a “Blood” neighborhood, coupled with Young Dre’s use of violent,
23 obscene and incendiary hardcore gangster rap lyrics, created a situation in which serious
24 physical violence, including a shooting, was more likely than not and foreseeable;.

1 I. The failure of the defendants to investigate and discover that Young Dre is a Crip-
2 affiliated gangster rapper and then extending an invitation to perform at the 2004 Watts
3 Summer Festival along with 30-40 Crip crew backup performers all dressed in the
4 traditional “blue and white” associated with the Crip gang without extraordinary security
5 measures, monitoring or supervision; defendants failure to prevent the importation of
6 weapons into the WLCAC facility during the concert, the virtual non-existent of security
7 at the location; the failure of defendants to effectively monitor, supervise and control the
8 conduct, mannerisms, and language of Young Dre and crew during his performance, the
9 failure to limit the number of Crip-affiliated performers on stage to perform before an
10 expected audience of Blood gang members at a location well known to be considered
11 Blood Territory; the failure of the defendants to “cut the microphone” to stop Young
12 Dre’s incendiary performance, and lastly the failure of the defendants to separate and
13 escort Young Dre and his crew away from the agitated crowd members combined to form
14 a volatile and dangerous situation which was disrespectful of “Blood” gang members
15 present in the audience that led to the expected and foreseeable violent confrontation
16 between Young Dre’s “crew” and the crowd and further created a situation where serious
17 physical violence and/or a shooting was foreseeable and more likely than not.

18 **FACTUAL BASIS FOR OPINIONS**

19 9. In 2005, there were approximately three murders within an approximate quarter mile
20 area surrounding Nickerson Gardens and the WLCAC headquarters, as well as approximately 68
21 murders in the 10 square mile area surrounding the headquarters. (Exhibit 9, Deposition of Detective
22 Barling, page 19, lines 7-19).

23 10. KDAY personality Yolanda Whitaker has been involved in the Los Angeles “hip hop”
24 and “gangster rap” community for over sixteen years and, based upon the location of the 2005 WSF,

1 had fear for her safety during her appearance there. (Exhibit **13**, Deposition of Yolanda Whitaker,
2 page 8, lines 15-24, page 45, lines 21-25, and page 46, lines 1-3).

3 11. In August of 2003 District Attorney Steve Cooley and City Attorney Rocky Delgadillo
4 jointly requested a gang injunction against the Bounty Hunter Bloods from a Los Angeles Superior
5 Court judge, to prevent Bounty Hunter members from intimidating witnesses, possessing guns, doing
6 graffiti, and a variety of other criminal activities. According to City Attorney Rocky Delgadillo, "For
7 30 years, the Bounty Hunters have plagued this neighborhood with assaults, gunfire and robberies"
8 (*Los Angeles Times*, August 29, 2003).

9 12. WLCAC President Timothy Watkins is aware that the Nickerson Gardens "Bounty
10 Hunters" gang is a "Blood" gang that primarily controls the Nickerson Gardens housing project and
11 also that the Nickerson Gardens housing project is located approximately two blocks from the
12 WLCAC Headquarters. (Exhibit **3**, Deposition of Timothy Watkins, page 10, lines 13-22, and page
13 11, lines 9-11). More precisely the Bounty Hunter's territory is between 108th Street (north) to
14 Imperial Highway (south) extending west of Central Avenue to Avalon and extending east to
15 Willowbrook Avenue (See Map).

16 13. Detective Christopher Barling, a homicide investigator and court certified gang expert,
17 described Nickerson Gardens as having a "history of violence" and that the surrounding area is also
18 violent. (Exhibit **9**, Deposition of Christopher Barling, page 20, lines 4-25, and page 21, lines 1-9).

19 14. Photographs of the WLCAC property located at 10950 South Central Avenue, Los
20 Angeles, as well as the surrounding area, taken in January 2007 clearly show the presence of red
21 graffiti which is consistent with "Blood" affiliated criminal street gangs. (Exhibit **18**, photographs of
22 WLCAC property taken January 24, 2007).

23 15. "Crip" affiliated street gangs and "Blood" affiliated street gangs have a long standing
24 conflict towards each other that has resulted thousands of assaults and hundreds of murders, however,

1 individual members of the gangs may generally coexist at a location without violence as long as
2 respect is maintained. (Exhibit 9, Deposition of Christopher Barling, page 38, lines 21-22, page 40,
3 lines 20-25, page 41, lines 1-8, page 42, lines 7-12; Exhibit 4, Deposition of Julio Gonzalez, page 22,
4 lines 8-18, page 44, lines 11-25, and page 45, lines 1-5).

5 16. No apparent security guard was employed by the Watts Summer Festival on August 12,
6 2005, nor was any security or competent individual posted in the concert area to monitor and manage
7 the hip-hop KDAY Radio stage and attendees of the concert on the day of the shooting death of
8 Joseph Randall. (Exhibit 7, Biggers Depo. page 32 line 8 through page 33 line 4; Exhibit 14, Maxent
9 Depo. page 13 line 22- page 14 line 6; page 15 lines 7-13; and Exhibit 8, Titus Depo. page 15 lines
10 13-18).

11 17. KDAY personnel arranged for the performance of “Young Dre,” a member of the
12 “Kitchen Crip” street gang, at the 2005 WSF and introduced him to the crowd. (Exhibit 15 Docs.
13 Produced (Email from Monee Perry/KDAY to Michelle S. (rep. of Young Dre) dated 8/4/05; Exhibit
14 5 Perry Depo., page 156 lines 15-19; page 192 line 24- page 193 line 1)

15 18. Young Dre brought approximately 30-40 members of his “crew” onto the stage with
16 him during his performance. (Exhibit 3, Deposition of Timothy Watkins, page 111, lines 12-23, and
17 page 112, lines 13-16)

18 19. Both Young Dre and the 30-40 members of his “crew” were dressed in blue and white
19 outfits, a color commonly associated with “Crip” affiliated criminal street gangs. (Exhibit 7,
20 Deposition of Mart Biggers, page 34, lines 2-25, page 41, lines 16-25, page 49, lines 5-8; Exhibit 3,
21 Deposition of Timothy Watkins, page 78, lines 16-19, page 84, line 5, and page 70, lines 3-6).

22 20. Young Dre’s performance included obscene, incendiary and violent language directed
23 at members of the crowd which also involved Young Dre making “Crip call” sounds and using Crip
24 gang gestures which are commonly known as a means of summoning fellow “Crip” gang members to

1 a location, acts which, when viewed in totality, constituted an extreme demonstration of disrespect
2 towards the numerous “Blood” gang members present in the audience who were described by Yolanda
3 Whitaker as “young thugs...looking for trouble.” (Exhibit 13, Deposition of Yolanda Whittaker, page
4 25, lines 1-2, page 50, lines 4-25; Exhibit 3, Deposition of Timothy Watkins, page 108, lines 6-24,
5 page 110, lines 19-25, page 111, lines 12-25, page 112, lines 1-16; Exhibit 7, Deposition of Mart
6 Biggers, page 13, line 25, page 14 lines 1-4,page 15, lines 1-3; and Exhibit 4, Deposition of Julio
7 Gonzalez, page 96, lines 20-25, page 97, lines 1-15).

8 21. After leaving the stage, Young Dre and his “crew” were permitted to walk directly into
9 the audience to confront the agitated crowd, which included numerous “Blood” gang members,
10 leading to an altercation between the two rival gang members. (Exhibit 3, Deposition of Timothy
11 Watkins, page 67, lines 7-14, page 70, lines 3-6; and Exhibit 7, Deposition of Mart Biggers, page 41,
12 lines 16-25, page 49, lines 5-8).

13 22. While Crip and Blood rival gang members were forming into groups and squared-off in
14 the concert venue area consisting of approximately 30-40 gang members per side, Watts Labor
15 Community Action Committee (WLCAC) Director Timothy Watkins and WLCAC Secretary Janine
16 Watkins were called to the concert location to calm the escalating crowd agitation between gang rivals.

17 23. Upon arriving at the concert venue area in WLCAC Secretary Janine Watkins took
18 control of the microphone on stage and called for calm between the rival gang members while
19 WLCAC Director Timothy Watkins interjected himself into the fray between rival gang members to
20 separate and prevent the gang violence from occurring in the concert venue area. (Exhibit 3,
21 Deposition of Timothy Watkins, page 73, lines 13-18; and Exhibit 7, Deposition of Mart Biggers,
22 page 43, lines 2-17).

23 24. The length of time between the beginning of the disturbance caused by Young Dre’s
24 performance and the shooting of Joseph Randall was approximately ten minutes. (Exhibit 13,

1 Deposition of Yolanda Whitaker, page 28, lines 2-7, page 52, lines 17-24; and Exhibit 7, Deposition
2 of Mart Biggers, page 49, lines 12-19).

3 25. The length of time between WLCAC Director Timothy Watkins and Secretary arriving
4 at the WSF concert venue and the shooting incident resulting in the death of Joseph Randall was
5 “minutes”. (Exhibit 3, Watkins Depo. 78:3-7; 86:17-23).

6 26. Cities and counties throughout the country have banned hip-hop concerts due to the
7 propensity for gang related violence, including serious injury and death to attendees. Occurrences of
8 violence at hip-hop concerts have become so pervasive that the hip-hop industry, including rap artists
9 and producers have attempted to limit the likelihood of violence to enable them to earn a living
10 performing at concerts. (Exhibit 15, Mijares Depo. page 96 line 8 – page 97 line 4).

11 27. Despite the known and commonly appreciated high risks associated with hip-hop rap
12 concerts, including inviting a known Crip-affiliated rapper along with his 30-40 Crip-affiliated backup
13 members to perform at the 2005 Watts Summer Festival rap concert, without implementation of
14 extraordinary supervision, monitoring, control and security, particularly given the commonly held
15 knowledge that the venue location is at the epicenter of an area heavily populated rival gangs,
16 including Bounty Hunter Blood gang, Defendants negligently, recklessly and without regard to the
17 safety and wellbeing of the audience, created a dangerous and foreseeable condition ripe for an
18 outbreak of gang violence which subjected the attendees to serious injury and death, including Joseph
19 Randall.

20 28. Had Defendants exercised due diligence, including performing a simple background
21 check of the music and lyrics of Young Dre, they would have discovered that this performer and crew
22 were hardcore Crip affiliated gangster rappers that were wholly inappropriate to perform at a family
23 festival unless extraordinary security and monitoring were implemented for the safety and protection
24 of the attendees.

