

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Louise Brown, Thomas Dixon, & William J.
Hamilton, III,

Plaintiffs

vs.

City of Charleston, an incorporated
municipality and political subdivision of the
State of South Carolina & William S.
Cogswell, Jr., Mayor of the City of
Charleston, in his official capacity,

Defendants.

CASE NO.: 2:25-cv-02649-DCN-MHC

**AFFIDAVIT OF CAPTAIN MATTHEW
STANLEY**

1. That my name is Matthew Stanley and I am a Captain with the City of Charleston Police Department.
2. I have been a certified Law Enforcement Officer with the City of Charleston since 2004. I have experience in many areas of law enforcement including but not limited to: uniform patrol division, investigations including violent crimes, and special events.
3. I am a 2015 graduate of the Administrative Officers Management Program (AOMP), which provides graduate level management and leadership education for law enforcement professionals as part of the School of Public and International Affairs at North Carolina State University.
4. I have been involved for approximately 2 years reviewing requests for First Amendment protests consistent with the Ordinances of the City of Charleston.
5. I am the commander of operations for the department in relation to the 48th Annual Cooper River Bridge Run to be held on April 5, 2025.
6. I have reviewed and I am familiar with the First Amendment Demonstration Permit Application filed by "Lowcountry Up is Good, PAC, Inc." requesting permission to conduct an "Ace Mace" protest in the right of way adjacent to 900 Island Park Drive in the City of Charleston on Daniel Island on April 5, 2025, from 1 p.m. to 4 p.m. The requested protest area is a grassy area on Island Park Drive approximately 100 feet long and, at best, 20 feet wide. The permit application states that there may be up to 300 participants in two different shifts of 150 each.
7. I cannot in good faith approve on behalf of the Chief of Police said event at that location given the logistical considerations especially safety concerns.
8. The protest area is located next to a busy roadway which leads directly to the exit and entrance ramp to Interstate 526 Daniel Island exit. Cars coming from North

Charleston exit onto that road and go through one traffic light before encountering the requested protest area. Cars going north on Island Park drive are one traffic light away from the start of the entrance ramp onto Interstate 526 going to Mount Pleasant.

9. The area suggested for the protest does not have any curb or any other physical barriers if a vehicle were to unintentionally or intentionally leave this busy roadway. The protesters would be trapped between the road and the building with no easy means of escape.
10. The proposed protest is also on the same day as the Cooper River Bridge Run and the semi-final matches of the Credit One Charleston Tennis Tournament. The Cooper River Bridge Run is the 3rd largest 10k race in the country and has 34,000 people signed up to participate this year. That is already going to have police resources from multiple federal, state and local jurisdictions stretched thin that day limiting the department's ability to provide security for this event. Based on the permit application attendance of two shifts of 150 protesters, I would like to be able to assign 12-15 officers. We would also likely attempt to have two police vehicles parked strategically and a couple of barricades (not ones that would be sturdy enough to stop a vehicle). This would likely call for blocking a lane of travel which would reduce two lanes to one lane. This would be very bad on April 5th with the tennis tournament happening just a few blocks away and with the protest location on the primary exit off Daniel Island going towards Mount Pleasant and the primary entrance onto Daniel Island from North Charleston.
11. We have suggested that the protest take place the following weekend on Island Park Drive in between New Realm Brewing and Nancy Mace's office. The area is directly around the corner and approximately 100 yards from the suggested area of protest. There is a sidewalk area. There are sturdy and tall palmetto trees between the vehicular lanes of travel and the sidewalk. There is curbing between the sidewalk and travel lanes. There are also head-in angled parking spaces separated by curbed areas. The area affords much more protection from a car intentionally or unintentionally coming off the roadway, yet it is within very close proximity to the building that has Nancy Mace's office inside. Please see attached Exhibit A with a blue pen marking Nancy Mace's office. To be clear, this alternative location would still require 12-15 officers that I don't have available on April 5, 2025.


Captain Matthew Stanley
City of Charleston Police Department

Notary Public:

Sworn before me this 3rd day of April, 2025


My commission expires: June 20, 2026

