

Law Office of Valeria A. Gheorghiu

By: Valeria A. Gheorghiu, Esq.  
Attorney No.: 042912007  
113 Green Street, Suite 2  
Kingston, New York 12401  
Tel.: (914) 772-7194  
[valerialexiag@gmail.com](mailto:valerialexiag@gmail.com)

*Attorney for the Defendant, Chief Dwayne Perry*

<p>The State of New Jersey ,</p> <p>vs.</p> <p>Dwayne Perry,</p> <p>Defendant.</p>	<p>SUPERIOR COURT OF NEW JERSEY MUNCIPAL DIVISION BERGEN COUNTY SUMMONS # S-2017-000319-0233</p> <p>QUASI-CRIMINAL ACTION</p>
--	---

AFFIDAVIT OF TWO CLOUDS

STATE OF NEW JERSEY :

COUNTY OF BERGEN : S.S.:

Muriyd Williams, also known as Two Clouds, of full age, being duly sworn according to law, hereby deposes and says:

1. I am Muriyd Williams, also known as Two Clouds and I am a tribal member of the Ramapough Mountain Indians. I reside at 88 Kenwood Place, East Orange, New Jersey. I am currently a student at Ramapo College.
2. I was at the Ramapough ceremonial land at 95 Halifax Road regularly from the autumn of 2016 to the present. I was active in the ceremonies, community gardening and other activities of an environmental and cultural nature.

3. I witnessed many acts of racial bias and was the subject of such attacks on several occasions.
4. For example, on several occasions I saw people driving past the land on four wheelers, down Halifax Road, leaving the Polo Club Homeowner's Association and calling us "Mountain Niggers," yelling "Go back to your Mountain" and "Go back to where you came from."
5. On a regular basis, and I heard it over fifty times, drivers leaving the Polo Club Homeowners' Association would call out racial slurs like "fuck you, mountain niggers," and scream "Jackson White," during the summer of 2017 and the winter of 2016 – 2017. This also occurred during our ceremonies and prayers.
6. I also often found dog feces and green bags of dog feces on the property in the driveway on three different occasions, as if someone had intentionally thrown them there.
7. Another time, Charles Morgan, a tribal elder also known as Mud Turtle, and I saw the recently deceased Paul Beaupain, then an abutting neighbor, come down from his house to the Ramapough ceremonial land. We approached him and asked if we could help him. He claimed that some of our belongings were on his property. We replied that this was in fact our property, to which he responded with expletives such as calling me a "piece of shit."
8. I turned to my elder and asked him, "Elder, did you hear what he said to me?" and he responded "Yes," to which the Frenchman then turned to Charles Morgan and called him a "piece of shit" as well, and then also proceeded to call us "fucking gypsies" and "dirty stinking Indians."

9. I called for Chief Perry and a couple of other people to come back to Mr. Beaupain's house. A couple of minutes later a police officer came to Mr. Beaupain's property and spoke with him, and then asked me what happened. The officer asked Charles Morgan, Chief Perry, and I to show me the property line, and left after writing a report. We told the police officer what Mr. Beaupain said.
10. In October of 2016, Paul Scian, President of the Polo Club Homeowner's Association, gave us permission to use electricity on the front of the electric box by the ceremonial land, on Ramapough deeded property, I personally heard Mr. Scian give us permission, alongside Chief Perry, Charles Morgan and Harold Molt in October of 2016.
11. In November of 2016, several police cars came to the property because we were allegedly stealing electricity. On this day, an armed plain clothes officer told me that the President of the Polo Club Association, Paul Scian, called to complain about our stealing electricity.
12. I observed this plain clothes officer's partner in his SUV call for back, and then several other police officers arrived. He later told me he was an officer when asking for my information.
13. Before they left, I saw Kathy Murray, a member of the Polo Club Homeowner's Association, walking her dog nearby. She asked one of the officers if they saw us taking their electricity and the officer said yes. She then asked if they were going to arrest us. The Officer said no, we can't arrest them. Then they left and told us they are not allowed to use the electricity.

14. Ms. Kathy Murray also watched us through her binoculars and took photos of us on a regular basis for about three weeks towards the end of winter and the beginning of the Spring of 2017. We filed a police complaint.

*Muriyd Williams*

Muriyd Williams/Two Clouds

Sworn and subscribed to me

this 16<sup>th</sup> day of May, 2018.

*Marie Angela Ciampi*

**Marie Angela Ciampi  
Notary Public  
New Jersey  
My Commission Expires 11-30-22  
No. 2427518**