

DECLARATION OF KIMBERLY DICKERSON

I, being first duly sworn, depose and say that:

1. I am an Inspector and Director of the Internal Affairs Division (IAD) of the Metropolitan Police Department (MPD).
2. Amongst my duties as the Director is to oversee the investigations of allegations of misconduct of members of MPD.
3. It is my understanding that pursuant to the Freedom of Information Act (FOIA), a request has been made for the body-worn camera videos of officers who responded to the 5200 block of Sheriff Road N.E. on June 13, 2018 and June 25, 2018.
4. Eight-two videos have been identified as being responsive to the FOIA request.
5. MPD is currently administratively investigating the actions of all officers who responded to the 5200 block of Sheriff Road on the specified dates.
6. It is my belief based on twenty years of law enforcement experience that the release of the requested videos would interfere with the investigations of the involved officers' conduct. These investigations could result in disciplinary proceedings being commenced against those officers found to have acted improperly in violation of the law and/or department procedures. The police actions that were taken on the specified dates have garnered great public interest. Release of the videos would adversely affect the rights of involved officers to a just and fair adjudicative process should they be charged for engaging in misconduct.
9. Release of these videos would enable involved persons or witnesses to tailor their versions of what transpired to further their own interests, rather than accurately state the facts as they occurred at the time. Release of the videos would also make it possible for non-witnesses to interject themselves into the investigations simply by providing statements consistent with what

they saw in the videos. This would create a false narrative and result in inaccurate findings.

10. It is my assessment that no amount of redactions to the videos would make the videos appropriate for release. The redactions that would have to be made would essentially render the videos useless as faces and persons' bodies would have to be redacted in order to prevent anyone from being able to identify any person in the videos.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that the foregoing is true and correct.


Kimberly Dickerson

8-27-18
Date