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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA,

Case No. 3:12-cv-02265-SI

PLAINTIFF,

DECLARATION OF TRACY REEVE

v.

CITY OF PORTLAND,

DEFENDANT.

I, TRACY REEVE, being first duly sworn, do depose and say:

1. I am the City Attorney for the defendant City of Portland, Oregon in the above-entitled matter and I make this declaration in support of Defendant City of Portland's Post Status Conference Memorandum.

2. I was present for the entirety of the October 25, 2016, Status Conference.

3. David Kif Davis and Robert West both spoke at the status conference and Mr. Davis made racist and sexist comments during the hearing about two of the city attorneys who represented the City at the hearing.

4. Shortly after conclusion of the status conference, I walked back to City Hall with the city attorneys who appeared in Court, along with two Police Bureau representatives. We were verbally accosted immediately outside the courthouse by several individuals, two of whom, David Kif Davis and Robert West, were known to me.

5. Both Mr. Davis and Mr. West followed, filmed and verbally harassed us all the way back to City Hall, and had to be prevented from entering City Hall with us after hours.

6. I am aware that Mr. Davis has also posted disturbing video about one of these attorneys online resulting in extreme online harassment and misogyny directed toward that attorney.

7. Attached hereto as Exhibit A is a true and correct copy of a letter signed by Portland's six elected officials: Mayor Charlie Hales, Commissioner Nick Fish, Commissioner Amanda Fritz, Commissioner Steve Novick, Commissioner Dan Saltzman and Auditor May Hull Caballero.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury pursuant to 28 U.S.C. § 1746.

Dated: November 3, 2016.

Respectfully submitted,

/s/ Tracy Reeve

TRACY REEVE, OSB # 891123

City Attorney

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Of Attorneys for Defendant