

IN THE COURT OF COMMON PLEAS 2022 SEP 14 PM 2:58
WARREN COUNTY, OHIO

JAMES L. SPAETH
CLERK OF COURTS

Carol Donovan <i>et al</i> ,	:	
	:	Case No. 21CV94117
Plaintiffs,	:	
	:	Judge Tepe
v.	:	Magistrate Moll
	:	
City of Lebanon <i>et al</i> ,	:	AFFIDAVIT OF BROOKE
	:	HANDLEY IN SUPPORT OF
Defendants.	:	PLAINTIFFS' OPPOSITION TO
	:	DEFENDANTS' MOTION FOR
	:	SUMMARY JUDGMENT

I, BROOKE HANDLEY, having been first duly sworn upon oath, depose and say:

1. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.
2. I have lived in Lebanon, Clearcreek Township and Turtlecreek Township for most of my life.
3. As I testified in my deposition, I attended the first Lebanon Citizen's Academy in 2019. This was what inspired me to begin attending more City Council meetings. Once I started to learn what was going on at City Council meetings, I wanted to get more involved.
4. In 2020, my attendance at City Council meetings really started to increase around the time the Human Relations Commission and resolution was being discussed at meetings.
5. In 2021, I continued to attend City Council meetings, particularly once the sanctuary city ordinance was introduced. I didn't (and don't) feel very comfortable going to City Council meetings, but some issues are so important to me that they compel my attendance.
6. Even though I have gone to City Council meetings since the Ordinance passed, out of fear, I can't participate. As I testified during my deposition, I did not offer my opinion at the May 2021 meeting when the sanctuary city ordinance was passed. I did not speak out of fear of being the

target of someone carrying a concealed weapon. I knew that there were many such people at the meeting that disagreed with my opinion. It was terrifying.

7. Even after it passed, the sanctuary city ordinance continued to come up at City Council meetings in one way or another for about the next six months. The City knew this was contentious—there was a police officer present at the meetings, which never was the case previously.

8. I never offered my opinion on the sanctuary city ordinance at City Council meetings during this period of time. That was because of the Ordinance that allows people to conceal carry firearms at City Council meetings.

9. This year the Ohio Legislature repealed the law that required people to get a permit to conceal carry a firearm. This makes me feel even more uncomfortable at City Council meetings. The combination of the Ordinance and permitless carry makes me feel like it is not safe for me to offer my full opinions without risking my personal safety.

* * *

DATED this 12th day of September, 2022


BROOKE HANDLEY

SUBSCRIBED AND SWORN TO before me this 12th day of September, 2022


Notary Public for the State of Ohio



Cara Alan Covington
Notary Public, State of Ohio
My Commission Expires:
February 18, 2027