

IN THE CHANCERY COURT FOR THE TWENTIETH JUDICIAL DISTRICT
DAVIDSON COUNTY, TENNESSEE

CLARA RENEE BREWER,)	
Petitioner,)	
v.)	No. 23-0538-III
METROPOLITAN GOVERNMENT OF)	
NASHVILLE AND DAVIDSON COUNTY,)	CONSOLIDATED
Respondent.)	***controlling case***

JAMES HAMMOND AND TENNESSEE)	
FIREARMS ASSOCIATION, INC.,)	
Petitioners,)	
v.)	No. 23-0542-III
METROPOLITAN GOVERNMENT OF)	
NASHVILLE AND DAVIDSON COUNTY,)	
Respondent.)	

DECLARATION OF ASSISTANT CHIEF MIKE HAGAR

I, Mike Hagar, under the penalty of perjury, declare as true and correct the following:

1. I am over the age of 18 and competent to testify to the matters stated herein, which are based on my own personal knowledge.
2. I am an Assistant Chief with the Metropolitan Nashville Police Department ("MNPDP").
3. I joined MNPDP on April 1, 1990, and since then I have worked in the following assignments: Patrol, Traffic, Planning & Research, Training, Case Preparation, Identification/Crime Lab, Strategic Development, and Executive Leadership. Since 2017, I have been in the position of Deputy Chief or Assistant Chief.
4. Prior to joining MNPDP, I worked at the police department in Gallatin, Tennessee.
5. I have earned a Juris Doctor degree from Nashville School of Law.

6. MNPD officers have been investigating and gathering information relating to the shooting at The Covenant School since it occurred on March 27, 2023. The MNPD investigation into the matter is still an active, ongoing criminal investigation and an open matter.

7. Based on my 34 years of experience in law enforcement, I believe that harmful and irreversible consequences could result from disclosing investigative files prematurely, including in this case.

8. The MNPD's investigative file is the product of the education and investigative experience utilized by the law enforcement officers to gather relevant documents, items, and electronic files related to this crime.

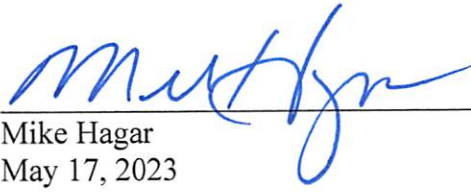
9. It is essential that police investigators be able to gather materials freely and broadly, using their judgment, without fear that materials they gather will prematurely be released to the public and cause prejudice to the effectiveness of the investigation.

10. I have a good faith belief that the Police Department's denial of Petitioners' public records requests were proper.

11. MNPD must continue and conclude its investigation in an unrushed, deliberate manner, before the records are released.

12. I have reviewed the writings submitted to the Court on May 12 for *in camera* review and the proposed redactions. Balancing the on-going investigation, with the pending litigation, I do not believe that releasing the redacted version of the writings will impede the investigation. Therefore, the MNPD does not object to the release of the redacted records, if after having heard from all interested parties and the Covenant parents, if this Court should so direct.

13. The remainder of the requested records related to the ongoing criminal investigation should remain confidential until the conclusion of the investigation or any resulting criminal case.



Mike Hagar
May 17, 2023