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

CLARA RENEE BREWER; JAMES HAMMOND AND THE TENNESSEE FIREARMS ASSOCIATION, INC.; MICHAEL P. LEAHY AND STAR NEWS DIGITAL MEDIA, INC.; THE TENNESSEAN; RACHEL WEGNER; and TODD GARDENHIRE in his individual capacity; Petitioners, v. METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY; Respondent,	)	Case No. 23-0538-III CONSOLIDATED **controlling case**
PARENTS OF MINOR COVENANT STUDENTS JANE DOE AND JOHN DOE; THE COVENANT SCHOOL; and COVENANT PRESBYTERIAN CHURCH; Intervenors.	)	

DECLARATION OF LIEUTENANT ALFREDO AREVALO

I, Alfredo Arevalo, 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 a Lieutenant with the Metropolitan Nashville Police Department ("MNPD").

3. I am assigned to the MNPD Professional Standards Division which incorporates the MNPD Office of Professional Accountability ("OPA") and have worked in that position since February of 2023. Prior to that, I was a sergeant with OPA since January 2018.

4. I have reviewed many postings on the *Tennessee Star* website that discuss records and documents contained in the Covenant School shooting criminal investigative case file. That criminal investigation is still open and pending with the MNPD Homicide Unit.

5. After a leak of three pages of the Covenant School shooter Audrey Hale's journal on November 6, 2023, OPA investigated the leak under my supervision. On that same date, as part of the investigation, OPA requested the complete criminal investigative case file in existence at that time.

6. A hard drive containing the complete criminal investigative case file was hand delivered to me November 7, 2023. Upon receipt of the file, I did not view it; I had no reason to do so based on the advancement of the leak investigation. Rather, I handed the external drive containing the criminal investigative case file to the OPA Lieutenant at that time, Garet Davidson, to store in the OPA safe located in his office. Mr. Davidson was the only person at the time who had the key and combination to the locked safe.

7. On November 20, 2023, I personally saw Mr. Davidson open the OPA safe and I retrieved the hard drive. I then personally delivered the hard drive containing the criminal investigative case file to the MNPD Homicide Unit and watched Lt. Brent Gibson store it back in their locked safe.

8. At the end of December of 2023, Mr. Davidson resigned from MNPD.

9. On June 4, 2024, Mr. Davidson appeared on the *Tennessee Star* radio show and was interviewed by Michael Patrick Leahy. In that interview, he discussed the content of a memo that the FBI sent to MNPD regarding the Covenant School shooting that had previously not been publicly released. One day later, on June 5, 2024, the *Tennessee Star* said it had obtained dozens of pages from the shooter's journal from a source. The *Tennessee Star* subsequently started publishing stories about the contents of the Covenant School criminal investigative case file. Mr. Davidson has continued to appear on Leahy's radio show for interviews about the Covenant School criminal investigative file, although at no time did he

have any active or passive role in the Covenant School criminal investigation or the subsequent administrative investigation into the leak.

10. I am aware of the following news stories related to the Covenant School investigative records:

a. On May 30, 2024, Garet Davidson appeared in a broadcast interview on 99.7FM with Brian Wilson to discuss a complaint that he had filed with the MNPD. During that interview, Davidson referenced the open Covenant School investigation and reported contents of the Covenant School criminal investigative case file and open investigation stating: "I know there has been a search warrant served. One of the practitioner's offices, I think home as well, regarding some documentation." This was also reported in the *Tennessee Star* on May 31, 2024. (https://tennesseestar.com/justice/retired-officer-garet-davidson-tells-wtns-brian-wilson-mnpd-served-warrant-on-medical-practitioner-as-part-of-covenant-investigation/mgiffin/2024/05/30/).

b. On June 4, 2024, Michael Patrick Leahy interviewed Garet Davidson, as *Tennessee Star* reported. The interview included Mr. Davidson acknowledging having access to and having seen the Covenant School criminal investigative case file, and Mr. Davidson discussed his perceptions regarding the contents. (https://tennesseestar.com/justice/retired-mnpd-lt-garet-davidson-claims-fbi-told-nashville-police-not-to-release-documents-from-covenant-school-killer-audrey-elizabeth-hale-investigation-pointed-to-precedent-for-document-destruction/tpappert/2024/06/04/.

c. On June 4, this appeared on the *Tennessee Star* website:

A retired Metro Nashville Police Department (MNPD) officer told ***The Michael Patrick Leahy Show*** *on Tuesday that the psychologist who treated Covenant School killer Audrey Elizabeth Hale referred her patient to Vanderbilt University Medical Center (VUMC) for treatment and involuntary commitment after Hale expressed violent fantasies. ...*

Davidson, who left MNPD in January and was not involved with the case, explained that he was given the opportunity to review documents from other sources and at various points in the investigation. He stressed that he does not have access to the documents himself.

One of the police documents Davidson said he reviewed was a subpoena from an MNPD detective to VUMC, issued in either August or September of last year, which sought records related to Hale's treatment.
Citing the documents he reviewed, Davidson said, "It appeared, at least detectives believed, that information from that therapist had been sent over to [Vanderbilt] Psych as part of a treatment and that over there they had specific notes within, in-house, regarding specific things she was thinking about."

Asked whether VUMC reported Hale's violent ideation, which Davidson previously claimed to 99.7 WTN radio host Brian Wilson included fantasies of committing a school shooting and killing her parents, Davidson explained he did not have knowledge of any reports by VUMC to law enforcement.

"As far as I know, they did not report out," said Davidson.

He confirmed, "As far as her ideations and stuff, I don't believe they reported out. From my knowledge they didn't."

(https://tennesseestar.com/news/psychologist-who-treated-covenant-school-killer-audrey-hale-referred-patient-to-vanderbilt-after-violent-fantasies-retired-mnpd-officer-claims/tpappert/2024/06/04/). Mr. Davidson discussed the contents of the Covenant School criminal investigative case file but then denied having access to the file. This was inaccurate, as Mr. Davidson did have access to the Covenant School criminal investigative case file during his time at OPA.

d. On June 5, 2024, during another interview with Mr. Leahy, Mr. Davidson acknowledged having access to the Covenant School criminal investigative case file and again discussed the content of the file. (https://tennesseestar.com/news/retired-mnpd-lieutenant-says-vanderbilt-psychiatric-hospital-did-not-report-covenant-killers-violent-fantasies-to-law-enforcement/khousler/2024/06/05/).

e. On June 5, 2024, documents, that I have learned were part of the Covenant School criminal investigative case file, began appearing on the *Tennessee Star* website. (https://tennesseestar.com/news/fbi-memo-on-protection-of-legacy-tokens-sent-to-nashville-police-in-may-2023-opposed-release-of-covenant-killer-documents-cited-destruction-precedent/tpappert/2024/06/05/).

f. Over the next few days, approximately 30 articles appeared on the *Tennessee Star* site discussing the Covenant School investigation, including quotations from the Covenant School criminal investigative case file, interview recordings and notes, and quotations from Mr. Davidson. (https://tennesseestar.com/covenant-school-shooting-investigation/).

g. On June 7, 2024, Brian Wilson, who had previously interviewed Garet Davidson about the Covenant School investigation, played recordings of interviews with Audrey Hale's parents. (https://www.youtube.com/watch?v=RoHymbKeCl4&feature=youtu.be).

h. On June 11, 2024, Fox17 published reported images of two pages of the shooter's journal and reported that these images were obtained from the *Tennessee Star*. (https://www.fox17.com/news/local/two-pages-of-covenant-shooters-audrey-hale-

writings-released-to-fox-17-by-tennessee-star-nashville-green-hills-middle-tennessee-crime-metro-nashville-police).

11. In attempting to identify the source of this leaked information, I have learned from Covenant school investigative supervisors assigned to the Criminal Investigation Division that the information in the *Tennessee Star* stories is the same information that was in the case file in November 2023 when I gave it to Mr. Davidson to store in his office at OPA.

12. I am appalled that this open investigative case file has been leaked to the media. I am saddened by the impact that this leak must have on the victims and families of the Covenant school shooting. I am aware that MNPD wants to know how the leak occurred and who was involved internally, and I have been told steps are being taken to ascertain how this information left MNPD's custody.

Executed this 13th day of June, 2024.

Alfredo Arevalo