

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
GREENEVILLE

KATERI LYNEE DAHL,]	
]	
Plaintiff,]	
]	
v.]	No. 2:22-cv-00072-KAC-CRW
]	JURY DEMAND
CHIEF KARL TURNER, AND CITY]	
OF JOHNSON CITY, TENNESSEE,]	
]	
Defendants.]	

DECLARATION OF JOE JAYNES

Comes Joe Jaynes and declares as follows:

1. My name is Joe Jaynes. I am over 18 years of age and I am competent to make this Declaration. I am a citizen and resident of Sullivan County, Tennessee. This Declaration is based upon my personal knowledge unless stated on information and belief. I have been a certified law enforcement officer in the State of Tennessee since December, 2004.

2. I am an Investigator in the Criminal Investigation Division ("CID") of the Johnson City Police Department ("JCPD"). In May and June of 2021, I was JCPD's liaison officer with the Federal Bureau of Investigation ("FBI"). As liaison officer, I work primarily on criminal investigations for crimes occurring in Johnson City, Tennessee. However, during May and June, 2021, I was only working one day per week in the FBI office. I started working full time as the FBI liaison officer in March or April, 2022.

3. I had no knowledge of Kateri Dahl ("Ms. Dahl") making any complaint to the FBI about the JCPD and/or Chief Turner while she was a Special Assistant United States Attorney ("SAUSA").

4. More specifically, I have been asked to assume, on information and belief, that Ms.

Dahl came to the FBI Office on May 11, 2021 and met with FBI Special Agent Bianca Pearson to make a complaint about JCPD and/or Chief Turner. I have no knowledge of any such meeting occurring. I never learned of any such meeting while Ms. Dahl was a SAUSA.

5. The first time I learned that Ms. Dahl had allegedly made a complaint to the FBI about the JCPD and/or Chief Turner was after Ms. Dahl filed this lawsuit.

6. Obviously, since I did not know that Ms. Dahl had complained to the FBI about the JCPD and/or Chief Turner until after the filing of her lawsuit, I did not communicate with anyone, including Chief Turner, that Ms. Dahl had complained to the FBI about the JCPD and/or Chief Turner.

Pursuant to 28 U.S.C. § 1746, I, Joe Jaynes, certify under penalty of perjury that the foregoing is true and correct. Executed February 9, 2024.

JOE JAYNES

