

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action
)	No. 2:97-CV-966
CITY OF STEUBENVILLE, <u>et al.</u> ,)	
)	
Defendants.)	
_____)	

DECLARATION OF CHARLES D. REYNOLDS

I, Charles D. Reynolds, state as follows, pursuant to the provisions of 28 U.S.C. § 1746:

1. I am the independent auditor in United States v. City of Steubenville (No. 2:97-CV-966 S.D. Ohio). I have been the auditor since January 1998. Prior to that time, I served as Chief of Police for Dover, New Hampshire from 1972 to 1991, and President of the International Association of Chiefs of Police from 1988 to 1989. As a result of my training and experience, I have expertise in the area of police practices.

2. In my position as auditor, I have continually monitored the City of Steubenville's ("City") compliance with the Consent Decree ("Decree") since 1998. Beginning in April 1998, I have issued quarterly reports detailing my findings regarding the City's compliance with each provision of the Decree.

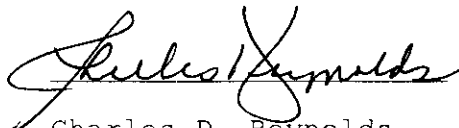
3. In April 2003, I found that the City had achieved substantial compliance with the Decree during the first quarter

of 2003, January 1, 2003 through March 31, 2003. During each of my seven subsequent quarterly reports, I have continued to find that the City is maintaining substantial compliance with the Decree. Most recently, I found that the City was still in substantial compliance with the Decree during the last quarter of 2004, October 1, 2004 through December 31, 2004. As a result, the City has maintained compliance with the Decree for two years.

4. In light of the City's fulfilling the requirements of Paragraph 96 of the Decree, I support the parties' joint request to terminate the Decree and dismiss the case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2/24/2005.



Charles D. Reynolds
Independent Auditor