AFFIDAVIT

STATE OF OKLAHOMA,   )

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COUNTY OF OKLAHOMA.   )

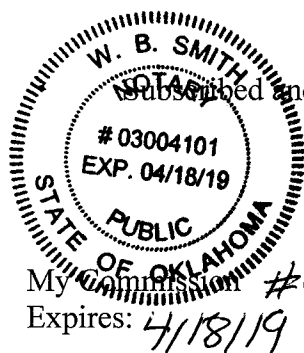Schad Meldrum, being of legal age, sound mind, and first duly sworn, deposes and states:

1.   I am currently the Director of Information Technology for the City of Oklahoma City ("City"). In this capacity, I ultimately oversee those responsible for maintaining the City's computer servers and central storage of electronic information. This includes the email system used by City employees. Currently, City email is maintained in server system "on premised" (local) using the Microsoft Exchange Server enterprise email system. To the best of my knowledge, and to which has been reported to me by expert managers and direct administrators of related systems discussed below, the following statements are accurate.

2.   I am familiar with the City's IT Department policy regarding the retention of City email, which is covered under a section of the *Information Systems Acceptable Use Policy,* a long-standing policy for the acceptable use of City computing systems. This policy concerns only email and any attachments to such email and does not apply to other official papers, documents, or records, generated by City employees. Emails are retained indefinitely on the email server system until deleted by the user. Once a user deletes an email message, calendar item, contact, task or note the items will be automatically retained and discoverable for a period of 60 days. After 60 days, the email is permanently deleted. Also, there is no offline backup of the email data from the server systems; redundancy is achieved through a multiple server/multi-location system. eDiscovery management is achieved through inherent administrative options of Microsoft Exchange Server.

3.   An approved "litigation hold" (Microsoft Exchange Server terminology), as set forth in the *Information Systems Acceptable Use Policy,* may be placed on a City employee's email account for up to one (1) year but those holds are reviewed monthly and extended as required. The "litigation hold" prevents email of a City employee from being deleted from the server. I am not part of the approval chain for litigation holds.

4.   Email of terminated City employees is treated similarly to that of current City employees, with one significant exception. After a City employee's service is discontinued, the regular user account for that now-former City employee is deleted after 60 days. At this point the users email account is "orphaned" or effectively deleted. Terminated employee email is retained and discoverable for a period of sixty (60) days from that point. However, if the terminated employee's email account has a litigation hold then the email account is maintained in an inactive state to preserve the email record.

5. The Microsoft Outlook Exchange client allows the creation and storage of email in an offline/local/non-server based file called a "Personal Storage Table" (.pst). These PST files are an old Microsoft mechanism for email management. Because of the challenges they create with discoverability, City IT worked to eliminate them by providing abundant email server system storage and implementing system policies for PST files. In March 2015, the ability for users to create or add to PST files was prohibited through a system configuration citywide except for a few rare approved exceptions based on business requirements. City IT worked with department-level IT contacts to move users' email in PST files up to the central server. In some cases, PST files were abandoned and left on local machines or in server file shares. For most PST files, we can determine the associated user. Most of these PST files are password protected but can be obtained and searched by system administrators.

6. It was reported to me that Elaine Taylor's Exchange email was handled consistent with policy.

7. It was reported to me that Police IT looked to other email on local drives.

8. I have no direct knowledge or oversight of the work that was done on Elaine Taylor's former primary machine. I understand that additional searches are being executed by City IT staff against the City email system of current Police Department employee email accounts for emails to and from Elaine Taylor which meet the criteria of date range May 1, 2014 and February 1, 2017 and keyword "Holtzclaw". I am not overseeing the detailed execution of these searches. I am aware of current litigation holds placed on the email accounts of approximately forty-six (46) City employees in the OCPD as specifically requested by the City Municipal Counselor's Office. These holds will prevent the permanent deletion of any email sent or received (including blind copies) in those email accounts, and preserve such email for the duration of the hold.

9. Since Police IT is semi-autonomous for City IT, I can only verify efforts against the City central Exchange email server system.
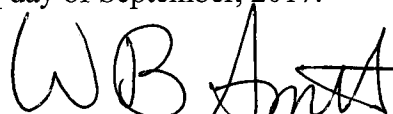
Further Affiant sayeth not.

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SCHAD MELDRUM

Subscribed and sworn to before me this 14 day of September, 2017.

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Notary Public

My Commission #03004101
Expires: 4/18/19