

EXHIBIT C

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

DIONNE YOUNCE and
KENNETH W. GREENE,

Plaintiffs,

v.

CASE NO.: 3:22-cv-931-TJC-PDB

CITY OF JACKSONVILLE, a
Florida municipal corporation,

Defendant.

DECLARATION OF LT. DEREK PORTER

1. My name is Lt. Derek Porter, and I submit this declaration pursuant to 28 U.S.C. §1746. I am over the age of 18 and fully competent to make this declaration.

2. I am a lieutenant with the Jacksonville Sheriff's Office (JSO). I have been with JSO for twenty-two years. I have served for six years as a lieutenant, and for approximately the past three and a half years, I have served in the Offender Tracking Unit. I supervise a team of 14 sworn detectives, 8 part-time employees, 2 sergeants, and 1 clerical support aide.

3. The Offender Tracking Unit is responsible for enforcing Jacksonville Ordinance 685.104 (Prohibited Activities for Sexual Offenders and Sexual Predators; Exceptions). The Offender Tracking Unit is responsible for ensuring

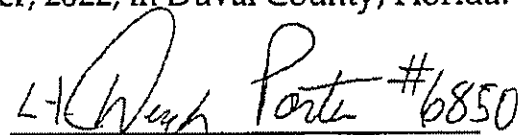
that the registered sexual predators, sexual offenders, and career offenders comply with the conditions of their probation and registration requirements within Duval County.

4. In light of this litigation, the pending motion for preliminary injunction, and the Eleventh Circuit's decision in *McClendon v. Long*, JSO will not enforce 685.104(a)(3)(ii) (the sign provision) this Halloween. JSO will continue to enforce the remaining provisions of 685.104.

5. In the past, JSO has encountered individuals who are bound by 685.104 and who have not complied with the sign provision. Typically, a JSO officer will remind the individual of the sign requirement. If the individual posts or replaces the sign, JSO takes no further action.

6. However, there have been several instances where a sexual offender or sexual predator not only failed to comply with the sign provision but was also dressed in costume, handing out candy, and/or using decorations to entice children. On those occasions, JSO has made arrests for failure to comply with 685.104.

I declare and state under penalty of perjury, that the foregoing is true and correct. Executed this 12th day of September, 2022, in Duval County, Florida.


Lt. Derek Porter