EXHIBIT B

(Declaration of Chandler Goodwin)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH – CENTRAL DIVISION

JANENE THORPE, an individual; CHRISTOPHER THORPE, Sr., an individual, CHRISTOPHER THORPE, Jr., an individual; CHARLIE THORPE, an individual,

Plaintiffs,

vs.

CEDAR HILLS CITY, a government entity; AMERICAN FORK CITY, a government entity; AMERICAN FORK CITY POLICE DEPARTMENT, a government entity; DARREN FALSLEV, in his official capacity as AMERICAN FORK CITY POLICE CHIEF; C. SLATE BLACKBURN, in his official and individual capacities; PHILLIP W.S. CRAIG, in his official and individual capacities; JENNIFER L. NAKAL in her official and individual capacities; KANDACE N. KONECHNY, in her official and individual capacities; SETH WIATE, in his official and individual capacity; and JOHN or JANE DOES 1-15, in their individual and/or official capacities;

Defendants.

DECLARATION OF CHANDLER GOODWIN

Case No. 2:23-cv-00242

Judge Ann Marie McIff Allen

Magistrate Daphne A. Oberg

I, Chandler Goodwin, am over the age of 18 and have personal knowledge of the following:

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1. I am the City Manager for Cedar Hills City ("***Cedar Hills***").

2. I have been the City Manager for Cedar Hills since January 1, 2017.

3. As City Manager, I oversee all departments, employees, and officials of Cedar Hills and am informed and apprised of any complaint, dispute, or issue involving Cedar Hills employees and officials.

4. As City Manager, I manage the Cedar Hills service agreements, including Cedar Hills public safety service agreement. I have reviewed Cedar Hills' records related to this incident.

5. Cedar Hills does not have its own police department.

6. Cedar Hills contracts with American Fork City ("***American Fork***") to provide public safety services to Cedar Hills. A true and correct copy of the Public Safety Service Agreement between Ceder Hills and American Fork is attached as Exhibit C to the Motion for Partial Summary Judgment (the "***Motion***").

7. Neither Cedar Hills nor any of its employees or officials were present during the police interaction in April 2021 that is the subject of the Second Amended Complaint filed by Plaintiffs (the "***Incident***").

8. Prior to the Incident, no Cedar Hills employee or official was notified that Plaintiff Janene Thorpe ("***Janene***") had been accused of throwing rocks at her neighbor or about the resulting investigation.

9. No Cedar Hills employee or official decided to issue the citation to Janene.

10. American Fork did not notify Cedar Hills or its employees or officials that its officers were issuing a citation related to the Incident.

11. American Fork did not notify Cedar Hills or its employees or officials that American Fork officers were going to Plaintiffs' home on the day of the Incident.

12. Cedar Hills and its employees and officials did not know about the Incident until after it happened.

13. Cedar Hills and its employees and officials do not direct American Fork or American Fork Police Department on how to perform their law enforcement services.

14. Cedar Hills did not direct American Fork or American Fork Police Department on how to interact with Plaintiffs leading up to or after the Incident.

15. Cedar Hills has never had any animosity towards Plaintiffs or intention to deprive Plaintiffs of their rights.

16. Neither Cedar Hills nor its employees or officials met with the American Fork Police Department or its officers to discuss Plaintiffs prior to the Incident.

17. Prior to Plaintiffs' allegations in this case, Cedar Hills did not receive any complaints or allegations of police misconduct by American Fork or American Fork Police Department.

18. Prior to Plaintiffs' allegations in this case, Cedar Hills did not receive any complaints or allegations of unlawful entry, violation of privacy rights, or excessive force by American Fork or American Fork Police Department.

I make the foregoing declaration under penalty of perjury of the State of Utah.

DATED this 29th day of June 2026.

*/s/ Chandler Goodwin**
Chandler Goodwin
*(*signed electronically by Kimberly A. Smith with permission from Chandler Goodwin)*