

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

NEW YORK CIVIL LIBERTIES UNION,

Petitioner,

Index No. \_\_\_\_\_

-against-

NEW YORK CITY POLICE DEPARTMENT, and  
KEECHANT L. SEWELL, in her official capacity as  
Commissioner of the New York City Police Department,

Respondents,

**AFFIRMATION OF BETH  
HAROULES IN SUPPORT  
OF VERIFIED PETITION**

For a Judgment Pursuant to Article 78  
of the Civil Practice Law and Rules.

BETH HAROULES, a member of the bar of New York, affirms the following to be true under the penalties of perjury.

1. I am a Senior Staff Attorney and the Director of Disability Justice Litigation at the New York Civil Liberties Union (“NYCLU”) Foundation and represent the petitioner in this action. I make this Affirmation upon personal knowledge and in support of the Verified Petition dated March 17, 2023 (the “Verified Petition”), in the above-captioned case.

2. **Exhibit A** is a true and correct copy of the NYCLU’s December 13, 2022 FOIL request to the NYPD.

3. **Exhibit B** is a true and correct copy of the NYPD’s FOIL acknowledgment email dated December 15, 2022.

4. **Exhibit C** is a true and correct copy of the NYCLU’s Administrative Appeal dated December 16, 2022.

5. **Exhibit D** is a true and correct copy of the NYPD's December 19, 2022 Response to the NYCLU's Administrative Appeal.

6. **Exhibit E** is a true and correct copy of the New York Mayoral Involuntary Removals Directive titled "Mental Health Involuntary Removals as of 11/28/2022," available at <https://www.nyc.gov/assets/home/downloads/pdf/press-releases/2022/Mental-Health-Involuntary-Removals.pdf>.

7. **Exhibit F** is a true and correct copy of the transcript of Mayor Adams November 29, 2022 press conference announcing the Involuntary Removal Directive, titled "Transcript: Mayor Eric Adams Delivers Address on Mental Health Crisis in New York City and Holds Q-and-A November 29, 2022, available at <https://www.nyc.gov/office-of-the-mayor/news/871-22/transcript-mayor-eric-adams-delivers-address-mental-health-crisis-new-york-city-holds>.

8. **Exhibit G** is a true and correct copy of the NYPD's "Finest Message" regarding the Involuntary Removals Directive dated 2022-12-06, 09:02:32.

9. **Exhibit H** is a true and correct copy of the Hearing Transcript of the Minutes of the Committee on Mental Health, Disabilities, and Addiction Jointly with the Committee on Hospitals Jointly with the Committee on Public Safety Jointly with the Committee on Fire and Emergency Management, New York City Council (February 6, 2023), available at <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=5993305&GUID=3A32BD99-6327-41A9-8789-5AE7D951D811>.

Dated: March 17, 2023  
New York, New York



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BETH HAROULES

**CERTIFICATE OF COMPLIANCE WITH 22 NYCRR §202.8-b**

I hereby certify that this Affirmation complies with the word count limitation of 22 NYCRR §202.8-b because the total word count, according to the word count function of Microsoft Word, the word processing program used to prepare this document, of all printed text in the body of the affirmation, excluding the parts exempted by §202.8-b is 310 words.

Dated: March 17, 2023  
New York, New York



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BETH HAROULES  
*Counsel for Petitioner*