GOVERNMENT OF THE DISTRICT OF COLUMBIA Police and Firefighters' Retirement and Relief Board

In the matter of:

ERIN SMITH Petitioner D.C. Metropolitan Police Department Case No. PD21-1045

Survivor Annuitant

DECLARATION OF DR. JONATHAN L. ARDEN

COMES NOW your Affiant, Jonathan L. Arden, and states upon his personal knowledge,

information and belief:

1. I am over the age of 18 and I am competent to testify on the matters contained

herein.

2. I am a licensed medical doctor and have practiced in the field of forensic pathology

for over 35 years. I am the former Chief Medical Examiner of the District of Columbia. A copy of my CV is attached hereto.

3. I was retained to render an expert opinion on the manner and cause of death of

Jeffrey L. Smith.

- 4. In connection with this matter, I have reviewed the following:
- a) The Report of Investigation, and the Report of Autopsy with diagrams (signed March 18, 2021) for Jeffrey Louis Smith, from the Virginia Office of the Chief Medical Examiner.
- b) Certificate of Analysis (i.e., Toxicology Report) for Jeffrey Smith from the Virginia Department of Forensic Sciences, dated 2/10 2021.

c) Autopsy photographs.

- d) Autopsy radiograph.
- e) Certificate of Death, dated 1/19/2021.
- e) The Forensic Medical Report of Dr. Patrick J. Sheehan, dated July 12, 2021.

- f) The US Park Police crash report.
 - 5. I hold the following opinions to a reasonable degree of medical certainty:
 - a) I agree with the Medical Examiner's opinion that the direct cause of Jeffrey Smith's death was a single tight contact gunshot wound to the head that resulted in a mortal brain injury.
 - b) I agree with Dr. Sheehan's opinion that trauma of January 6, 2021 led to depression which, in turn caused Jeffrey Smith's death. There is a direct cause and effect relationship between the line of duty work trauma on January 6, 2021 and Jeffrey Smith's death on January 15, 2021.
 - c) The social history reports from Erin Smith, together with the decedent's friends and family, strongly support Dr. Sheehan's finding that Jeffrey Smith's suicide was caused by the events of January 6, 2021. The report contains detailed information as to the traumatic events of January 6, 2021 (as Jeffrey Smith described them to others). Jeffrey Smith had no prior history of depression, mental health issues or mental health treatment. There is no evidence of any other intervening or superseding trauma (between January 6, 2021 and January 15, 2021) that could have led to the suicide. What is particularly compelling in this case is that there was a dramatic change in Jeffrey Smith's mood and behavior after the January 6, 2021 riots. In my experience as a forensic pathologist, it is not uncommon to see a suicide in an individual with no prior history of mental health issues which is brought on by an acute trigger (like a death, domestic issue or other physical trauma). As detailed by Dr. Sheehan, there is hard and reliable evidence that Jeffrey Smith changed after the physical and emotional trauma he experience on January 6, 2021 as he became withdrawn and

upset. These facts, together with the timing of the suicide (nine days after the trauma) strongly supports causality.

 d) The acute, precipitating event that caused the death of Officer Smith was his occupational exposure to the traumatic events he suffered on January 6, 2021, in connection with his duties as a Metropolitan Police Officer of the District of Columbia.

I DO SOLEMNLY SWEAR OR AFFIRM THAT THE FOREGOING IS TRUE THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.



JONATHAN L. ARDEN, M.D.

DATE: <u>7/29/2021</u>