

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

CHARLES MCKINLEY,

Plaintiff,

v.

**PETSMART, INC. and AL
WILLIAMS,**

Defendants.

**CIVIL ACTION NO.
2:05-CV-00562-F**

AFFIDAVIT OF KRISTI HILL

Pursuant to 28 U.S.C. § 1746, Kristi Hill states as follows:

1. My name is Kristi Hill. I am over eighteen (18) years of age, have a sound mind, and suffer from no disabilities that would prevent me from giving this Affidavit. I have personal knowledge of the facts and information contained in this Affidavit. I give this Affidavit for use in the above-styled legal proceeding.
2. During the relevant time period, I was Pet Care Manager for the PetSmart store in East Chase Plaza, Montgomery, Alabama. Kelly Watson was the Store Manager for this location. Charles McKinley was Presentation Manager at this location.

3. On the evening of August 10, 2004, I witnessed Mr. McKinley leaving the PetSmart store alone during non-business hours carrying a large bag of store merchandise.
4. I was concerned that Mr. McKinley was violating the Off-Hours Access Control Policy and Procedure and stealing store merchandise.
5. I notified Ms. Watson of the matter.
6. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18 day of April, 2006.


KRISTI HILL