

AFFIDAVIT OF JERSEY JACKSON

Jersey Jackson, here, coming to you live from Rowe, Oregon! Before we get into the meat of my story, let's start with some background. I'm 31 years old, and I was born right here in Rowe. I've lived here all my life. I went to college at Rowe State University, where I earned a B.A. in journalism in 2012. I've worked as a reporter for *The Rowegonian* for the last year and a half or so.

I've been obsessed with journalism for basically my whole adult life. During my freshman year of high school, I read *All the President's Men*, which totally mesmerized me. (The movie was almost as good, although I couldn't quite get past the terrible '70s fashion...) Isn't it incredible to think that a reporter can change the course of history with nothing more than a pen, paper, and a dogged commitment to uncovering the truth? Right then and there, I decided to follow Woodward and Bernstein's example. I would become a professional muckraker, exposing corruption and injustice wherever I found it.

My first few years in journalism were pretty lean; for a reporter, at least, journalism isn't exactly what I'd call a "lucrative" business. To me, though, that didn't matter. I loved what I did, and, most of the time, I felt like I was really making a difference. I started my career at *What's Up Rowe?* — a weekly publication that, in fairness, you might call a "rag" — writing about whatever scandals I happened to dig up. My biggest stories during that time included an exposé on how a group of students at Burrough High School drugged their rival school's star basketball player before a big tournament; an investigation into recurring thefts from the till at Buddie's Burgers, one of Rowe's most popular fast-food joints; and a three-part story about an environmental conflict between a sustainable fishing business and a community association out in rural Cascade County.

One of the most important lessons I learned during my time at *What's Up Rowe* was that good journalism requires a journalist to push boundaries — and that it's sometimes hard to tell where to draw the line between what's appropriate and what's not. When I began my investigation into the scandal at Burrough High School, I felt at first like I was getting nowhere. A source had assured me that I was onto something, though, and a stakeout, I thought, would give me the best chance of catching the culprits in the act. The scandal had to do with basketball, so I figured the best place to watch for trouble would be the Burrough High School gym. I wasn't authorized to be in the gym, but I didn't let that stop me. One night, I used a nail file to pick the gym's lock and let myself in. I didn't see any illicit activities, but, unfortunately for me, I crossed paths with a security guard, who called the police. The Rowe Police Department arrested me that night, and it was the scariest night of my life. I was handcuffed, jammed into the back of a squad car, and hauled off to Rowe PD's headquarters, where I spent the night alone in a jail cell. Suffice to say I *never* want to go through that sort of thing again.

1 It took until the morning for me to convince the detective that I had come to the gym in my capacity
2 as a journalist, and that I was only there to record video evidence of what I expected to be a major scandal.
3 As she pointed out, though, that didn't change the fact that what I had done was illegal. The detective also
4 noted that the nail file I had used to break the gym's lock was arguably a "burglary tool." I thought that
5 was a little ridiculous, but, eventually, I realized they had the goods on me. In exchange for a promise that
6 I wouldn't receive any jail time, I agreed in 2015 to plead guilty to a single count of burglary in the first
7 degree. I was glad to put the whole thing behind me. None of that is to say I won't continue to push the
8 journalistic envelope, but since then I've been a lot more careful when I do.

9 I was excited beyond words when *The Rowegonian* agreed to hire me in early 2019. Obviously,
10 *The Rowegonian* is Rowe's flagship newspaper. It's been around for about a century, and it's broken all
11 of Rowe's biggest stories during that time. I mean, what journalist wouldn't want to work there? I had
12 submitted three or four prior applications to *The Rowegonian* over the years, and, each time, they told me
13 to check back when I had more experience. Finally, in early 2019, they decided to "take a chance" on me,
14 to use my editor's exact words. I knew this was my opportunity to prove myself and I wasn't going to let
15 my editor down.

16 For the rest of 2019, things were pretty slow, and I was getting more and more worried. What
17 would Jessica Gallagher (my editor) think if I couldn't dig up something juicy by the end of the year?
18 Fortunately, in December 2019, I caught a break. My friend and fellow journalist Jett Jones gave me a
19 scoop about the fate of the Digby Theater, which just a few months earlier had been the scene of an
20 unspeakable tragedy. There had been an explosion, Jett reminded me, and a young music fan had been
21 trampled to death in the ensuing stampede. Following the explosion, the Digby's owner, Camden
22 Buchanan, had decided to demolish the theater and replace it with a newer, shinier building. There was
23 just one problem: the Digby had been listed in the National Register of Historic Places since 1991. For
24 that reason, Jett explained, Oregon law required Rowe's City Council to determine that the Digby was
25 structurally unsound before it could approve of Camden's plan. It had done so a few days ago, Jett told
26 me, based on a report presented by a building inspector named Ari Frankel. There was something fishy
27 about Ari's report, and Jett suggested I should follow up on it. (Jett didn't want to touch the story herself
28 — something about being "too close to the action," as she put it — so she gave me the lead instead.)

29 I dug in immediately. And, after what seemed like an endless review of old newspaper clippings,
30 public records, and court filings, I finally figured it out: Ari was a *de facto* employee of Camden, and had
31 been for some time. In other words, Ari stood to gain financially from a decision by the City Council in
32 Camden's favor. Moreover, neither Ari nor anyone else had revealed that fact to the City Council, to
33 whom Ari had testified in no uncertain terms that the inspection had been done "independently." *The*

1 *Rowegonian* published a short piece by me outlining those revelations on December 18, 2019, two days
2 before the Digby's demolition was scheduled to take place.

3 I'm proud to say that my story caused an uproar over Camden's tactics. Camden and Are hadn't
4 exactly lied to the City Council, but they hadn't been entirely truthful, either. On December 19th, dozens
5 of social media posts were tagging my story and calling for a protest the next day. People were really
6 worked up, it seemed! If I was going to continue my coverage, I would have to attend the protest in person.

7 I arrived at the Digby at about 9:30 a.m. (30 minutes or so before demolition was scheduled to
8 begin) on December 20th. When I got there, things were peaceful but tense. The Rowe Police Department
9 had apparently been tracking the social media firestorm over my story, and, like me, they seemed to be
10 anticipating trouble. A row of about a dozen police officers had positioned themselves just outside the
11 chain-link fence that surrounded the Digby. About the same number of protesters were milling around in
12 a group about 30 or 40 feet in front of the line of police; some were holding large signs that read "Save
13 the Digby!" A couple of bulldozers and some other heavy construction equipment were parked in an empty
14 lot across the street.

15 When 10:00 a.m. rolled around, several construction workers appeared in the lot and began
16 powering up the construction equipment. That seemed to set the protesters off. In what seemed like an
17 instant, they linked arms and formed a line between the Digby and the construction equipment. They
18 began chanting: "Don't Demolish the Digby!" This, I knew, was my chance to develop another story. I
19 approached the line of protesters, hoping for a quote. Most of them, unfortunately, seemed to ignore me.

20 As I got toward the end of the line, though, one protester beckoned for me to come nearer. That
21 protester was "Danger" Smith, whom I know as a barista at Rowe's "Freedom Cup" coffee shop (which I
22 visit regularly). Smith began speaking into my phone, but before I could make out what Smith was saying,
23 I felt a hand slam down on my shoulder. I heard a stern voice from behind me. "Don't make me arrest
24 you, Danger," the voice said. "Just clear out of the street right now and we won't have a problem." As
25 soon as I heard the voice, I spun around to find myself staring at a police officer whom I now recognize
26 as Marlowe Navarro. I was shocked! Neither Smith nor I were doing anything wrong, but Officer Navarro
27 was right in Danger's face. "Officer," I asked, "what in the world are you doing? That person isn't doing
28 anything illegal at all! You can't arrest this person!" In an attempt to try to cool things down, I tried to
29 position myself between Officer Navarro and Danger, but Officer Navarro spun around and started yelling
30 at me. "You're blocking traffic, you're blocking these bulldozers, and now you're interfering with my job
31 as a police officer," Officer Navarro yelled at me. "Clear out now before I arrest you!"

32 I backed away, startled. I definitely didn't want a repeat of my experience in the Burrough High
33 School gym. Fortunately, after a moment, the construction equipment powered down, in response to which

1 the crowd went totally wild. They seemed to think that their protest had singlehandedly turned away the
2 bulldozers. Later that day, though, I read in *The Rowegonian* that Rowe’s City Council had — in response
3 to my story — ordered another inspection of the Digby before its demolition. I was elated! Never before
4 had any of my journalism produced such an important and tangible impact.

5 My elation, it turned out, was short-lived. As I read later in *The Rowegonian*, the second inspection
6 heavily criticized Frankel’s work, but it came to the same conclusion: the Digby was structurally unsound.
7 The City reaffirmed its approval of Camden’s plan, this time in a way that seemed more unimpeachable.
8 The Digby’s demolition was rescheduled for January 15, 2020. As soon as the news broke of the City
9 Council’s decision, Digby’s fans on social media became just as agitated as they had been before. I knew
10 there would be another protest on the day of the demolition, and, again, I knew I had to be there.

11 I arrived at the Digby on January 15th at around 9:45 a.m., about fifteen minutes before the
12 bulldozers were scheduled to move in. Unlike the last protest, things were anything but calm. A group of
13 about 30 or 35 protesters — more than last time, but not many more — had already linked arms and were
14 leaning with their backs against the fence surrounding the Digby. This time, none were holding signs or
15 chanting. Instead, they were screaming, yelling, and (in some cases) cursing at a line of police officers
16 that had formed in front of them. It was hard to say how many police officers were there, but there were
17 definitely more of them than last time. Plus, unlike last time, the police officers were decked out in what
18 looked like riot gear.

19 At 10:00 a.m., the bulldozers powered up. At the same time, the police moved closer to the
20 protesters and began talking to them; I was far enough away at that point that I couldn’t hear exactly what
21 they were saying, but it didn’t look friendly. A moment later, I saw a police officer by the bulldozers say,
22 with a megaphone: “You are trespassing on private property. Disperse now or you will be subject to
23 arrest!” That prompted a yell from the protesters, only two or three of whom dispersed. The police then
24 moved closer and began arresting the protesters who remained on the fence.

25 At that point, I had to make a journalistic decision. On one hand, I knew that I’d risk getting caught
26 up in the bedlam if I moved toward the protesters. On the other hand, though, I believed that I had a right
27 to be there (*i.e.*, on the sidewalk near the Digby) and to report on what I saw, which, by that point, I was
28 sure would be a major story. It also should have been easy for the police to distinguish me from the
29 protesters themselves: I was wearing a bright blue t-shirt with the word “Press” emblazoned in yellow on
30 both the front and back. My story wouldn’t be complete without a comment from one of the protesters —
31 I needed to hear directly from them about why they were there — so I steeled myself and began walking
32 toward the fence.

1 As I approached the protesters, I saw a familiar face: Danger Smith. Danger seemed to be backing
2 away from the line of protesters, and it soon became clear why. I heard Danger yell through the crowd:
3 “Let’s barricade ourselves in! They can’t knock it down if we’re inside!” What I saw next horrified me.
4 Danger picked up a rock from the ground and turned toward the Digby’s immense front door, which is
5 made of vintage stained glass. It looked to me like Danger was going to throw the rock over the fence and
6 smash the window, so I ran over to Danger — I was yelling “Stop!” as I ran — and grabbed the rock out
7 of Danger’s hand. A true and correct image of that rock is shown in Exhibit 1. I was facing the Digby’s
8 front door, but I was turned very slightly to the left, such that the door was slightly to my right. I recall
9 that I had the rock in my right hand as I was talking to Danger.

10 I started saying something to Danger (I don’t remember what), but a second or two later, someone
11 grabbed me from behind and forced me to the ground. I heard a familiar voice: “You again, huh? And I
12 expect you’ll say you were doing nothing illegal either?” It was Officer Navarro, who arrested me and
13 hauled me off to Rowe Police’s headquarters. I was released within a couple of hours, and the Chinook
14 County District Attorney ultimately charged me with disorderly conduct. I couldn’t believe it: I had done
15 *nothing* wrong, nor was there any conceivable reason for Officer Navarro to suspect as much. The charges
16 were dropped a week or so afterward, which should tell you something about how absurd they were.

17 I hereby attest to having read the above statement and swear or affirm it to be my own. I also swear
18 or affirm to the truthfulness of its content. Before giving this statement, I was told it should contain all
19 relevant testimony, and I followed those instructions. I also understand that I can and must update this
20 affidavit if anything new occurs to me until the moment before I testify in this case.

21 s/Jersey Jackson
22 Jersey Jackson
23 Dated: October 9, 2020.
24

25 Subscribed and sworn before me on October 9, 2020:
26

27 s/Roberta Bost
28 Roberta Bost
29