

AFFIDAVIT OF CAMDEN BUCHANAN

Hi there! The name's Camden Buchanan. I'm 54 years old, and I'm the founder and chief executive officer of Buchanan Properties LLC. Our company's mission is simple: we buy decrepit buildings, renovate them while keeping their basic charms and style intact, and then either lease them out or sell them. Sure, it's business, and I do pretty well for myself, but I like to think I'm also making a difference, you know? We give new leases on life (so to speak) to structures that most people have long forgotten, and I like to think that Rowe's skyline is better for it.

The Digby Theater, which we acquired in 2012, is one of our finest properties, but it's also turned out to be one of the trickiest to manage. The theater has been around since the 1920s, and, in my opinion, it's the single most gorgeous building in Rowe. I've *never* seen stained glass as beautiful or as intricate as that in the windows on the theater's enormous front doors. It's basically right in the center of Rowe, so it gets a ton of foot traffic, and it's long been Rowe's go-to venue for concerts, speeches, political rallies — you name it, and it's probably happened at the Digby. The problem, though, is that the Digby has been listed in the National Register of Historic Places since 1991, and that's really limited what we've been able to do with it. For years, I've been trying to convince Rowe's City Council to let us redo the theater to make it safer, brighter, and more durable than the current structure, which, as anybody who's ever visited the theater can tell you, is on its last legs.

Tragically, the explosion and stampede at last year's "Can You Dig It?" festival proved my point; a young music fan was trampled to death in part because the building has so few exits. After that — and following a presentation by my friend Ari Frankel on the Digby's structural unsoundness — the City Council ended up seeing things my way. Ari has worked for Buchanan Properties for quite a while; whenever we're thinking about buying or selling a property, we have Ari inspect it, so we've paid Ari a good chunk of change of the years. Naturally, we paid Ari to deliver the presentation to the City Council, too. Ari showed me a draft of the presentation before she delivered it, and she had characterized her inspection as an "independent" analysis of the Digby's structural soundness. I thought that was a little misleading, but I told Ari to go ahead and deliver it anyway. I mean, the City was going to make its decision based on Ari's findings, not on the label she attached to her remarks. In the end, who cares, right?

Anyway, once the City Council issued its decision permitting our renovations, things went swimmingly — for a time, at least. Our plan was to keep the Digby's basic architectural skeleton, but to redo the interior layout and exterior completely. The renovations were set to begin in mid-December when, just a few days before we broke ground, a reporter at *The Rowegonian* named Jersey Jackson published a story claiming that Ari had lied to the City Council when giving her presentation. The whole thing was

1 balderdash, but, within a day, it became clear that the public was buying it. Both in the online comments
2 to Jersey's story and on social media, I started seeing calls for a protest at the Digby. I didn't think much
3 of it at the time, but, just to be safe, I called the Rowe Police Department and asked that they send a couple
4 of officers to the scene to make sure things proceeded in an orderly fashion. I didn't attend the renovation
5 myself, though. (I had an appointment that day out in Cascade County.)

6 The morning of when the renovations were supposed to begin — December 20, 2020, I recall —
7 I received a call from my office manager Erin Esparza, who told me that, in light of Jersey's article, the
8 City Council had decided to suspend its authorization of our project. I was flabbergasted! How could the
9 City pull the rug out from under our feet just because of one measly article? It was absolutely ridiculous.
10 Fortunately, we were able to smooth things over with the City; we hired a second inspector who,
11 unsurprisingly, confirmed Ari's findings. I then worked with our contractors to reschedule the renovations
12 for January 15, 2020, and this time, I made sure to be there in person. I wanted to be 100% certain that
13 everything went off without a hitch. Like I did the last time, I called the Rowe Police Department and
14 asked that they send some officers to make sure things didn't get out of hand with any protesters.

15 Right away, though, I knew we were going to have a problem. The protesters had lined up against
16 the chain-link fence surrounding the theater and had linked arms. At 10:00 a.m., the construction
17 equipment in the lot next to the theater powered up, and that really seemed to set the protesters off. I was
18 standing in the lot across the street, but I had a pretty good view of what was going on: the protesters were
19 yelling in my general direction, and some even appeared to be locking themselves to the fence. I got out
20 my phone and recorded some of the sounds I was hearing. (I wanted to send the recording to *The*
21 *Rowegonian*; the last story had been so one-sided!) A true and correct copy of that recording is in the file
22 labeled Exhibit 3.

23 A moment or two later, I heard a police officer on a bullhorn announce: "You are trespassing on
24 private property. Disperse now or you will be subject to arrest." That seemed to have the opposite of its
25 intended effect. I didn't see a single protester leave, and when the police officers surrounding me saw
26 what little their announcement had done, they moved toward the protesters. A few moments after that, I
27 heard one of the protesters yell something about barricading themselves inside. It took me a second to
28 figure out where the voice was coming from, but I then noticed someone in a blue t-shirt standing in front
29 of the fence by the Digby's front door with what looked like a brick in the person's hand. I started to yell:
30 "Hey! That person is about to break down the door!" There was a beat, and then, fortunately, a police
31 officer grabbed the person by the wrist and appeared to arrest the person.

32 The police officer, whom I now know and recognize as Marlowe Navarro, walked the person,
33 whom I now know and recognize as Jersey Jackson (I had never met or seen Jersey's face before), right

1 by the place where I was standing. I heard the two of them talking as they went. “It wasn’t me!”
2 complained Jersey, “I took that rock out of Danger’s hand!” “I’m sure you did,” said Officer Navarro,
3 politely but with a definite note of sarcasm, “but we told you all to clear out and you didn’t.” Officer
4 Navarro then pushed Jersey into a squad car and started walking back toward the remaining protesters. By
5 that point, only two or three of them were still there, and Officer Navarro’s colleagues seemed to be trying
6 to pry them away from the fence. Officer Navarro started walking back toward the fence, but by the time
7 Officer Navarro got there, all of the protesters had either left or had been arrested.

8 The whole episode was pretty stressful. Fortunately, our contractors were able to reach the Digby,
9 which is scheduled for its grand re-opening in mid-2021. I’m grateful to Officer Navarro for saving the
10 Digby’s front door, which we’ve retained in our remodel. Who knows what would’ve happened if Officer
11 Navarro hadn’t taken that rock out of Jersey’s hand?

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

16 s/Camden Buchanan

17 Camden Buchanan

18 Dated: October 9, 2020.

19
20 Subscribed and sworn before me on October 9, 2020:

21
22 s/Roberta Bost

23 Roberta Bost
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