

AFFIDAVIT OF EMORY SANDS

1 After being duly sworn upon oath, the Affiant hereby states as follows: I am over 18 and
2 competent to make this affidavit. I was subpoenaed to testify.

3 I'm Emory Sands, Director of Security at Miller Tower – or, I suppose, former Director
4 at this point. I'm here voluntarily (although I do miss court overtime pay – you can do pretty
5 well when somebody “forgets” to give you the message that a case had been adjourned). Miller
6 Tower was supposed to be my little gift in life, a quiet gig on top of my pension after 27 years on
7 the job with the Metropolitan Police Department in Midlands City, the last six of which were as
8 the lieutenant commanding the Homicide Squad. Santa Ivo City was the promised land – all the
9 urban amenities without all the crime and contentiousness of the big MC. Everybody knows
10 Mayor Leapheart runs a tight ship. And at some point in your life, you just decide you've spent
11 enough time alone in rooms with people who hack...well, no need for detail. Emory Sands had a
12 plan, alright – and we all know how that went, now.

13 Miller Tower is the premier commercial property in Santa Ivo City, a commercial high
14 rise with two special features. (Well, three if you ask me – no residential units, and thus no
15 needy tenants calling that somebody stole their package with 37 bottles of disinfectant spray.)
16 The first 39 stories of the building were just offices – very nice offices, of course. I'm not sure
17 who came up with the idea to put the MSIG event hall and vault on the 40th floor, but there they
18 were, and both were engineering marvels. The MSIG hall had a ballroom, a gourmet kitchen, a
19 dining room, and everything else you needed for a high society soiree. The vault was built and
20 installed by MSIG—you know, the tech giant owned by the eccentric mega-millionaire Berkley
21 F. De la Porta. I think De la Porta wants to go to space or something. Anyway, the vault was
22 executed perfectly. Inches upon inches of steel and concrete, wired for even vibration if
23 somebody tried to breach it, and a door that looked like it belonged in a missile silo somewhere,
24 controlled by the latest in electronic and biometric security systems. We had all kinds of people
25 storing their can't-lose stuff there – stock certificates and proprietary papers from the corporate
26 tenants, some computer back-up tapes from various clients across the city, even some people
27 from the “State Department” who wouldn't let me open the plain, brown wrapper on the stacks
28 of whatever they were bringing in. This was the highest value target on the property, maybe in
29 the City, but it was also hardly a worry for me. The security features baked into the construction
30 meant there was almost nothing for me to do except to hold on to one of the two keys that needed

31 to be turned simultaneously in the Command Center to start the unlocking process (which still
32 took several minutes). I was never without that key, which I kept right next to my lucky
33 Midlands Marauders keychain.

34 At the risk of boasting, I was pretty happy with the security operation we established at
35 Miller Tower. Our standard deployment was fairly small – a handful of guards during the day
36 running the lobby (and making sure nobody made it past our layered controls who shouldn't),
37 and a floater as needed. I spent most of my time in the Command Center on the 40th floor.
38 Things were a bit more involved when we had events, but we'd worked out several tactical plans
39 that covered every need. We had planned deployments for low attendance events with high-
40 profile attendees, one for large crowds of people that nobody cared about, another for large
41 events with people who had their own security details. These covered pretty much everything,
42 and we'd mix and match if we needed to, supplementing the regular day crew with folks
43 moonlighting from the local Santa Ivo police department or college kids from the criminal justice
44 degree program over at Santa Ivo Tech. We'd dress them up in security guard uniforms, and no
45 one would know the difference. One 'tac plan,' though, we reserved for one night a year and one
46 night only – the annual Halloween charity gala. In 2022, that charity event was a going to be half
47 silent auction and half costumed cocktail party—all to benefit the sick kids over at Sohi
48 Children's Hospital. I'm certain there is something to be said about the upper crust of society
49 needing to don masks and costumes to be separated from their money, but far be it from me to
50 connect those dots.

51 Anyway, the planning for the charity gala started not long after Labor Day, and I swear
52 those six weeks took about six years off my life. The job itself was complicated and it mattered.
53 Santa Ivo's annual charity gala was always a large event with a lot of profile, some legitimate
54 targets (especially political and cultural), and a bunch of art and artifacts for the silent auction
55 that were always worth millions – literally. I had real work to do to keep everyone and
56 everything safe. But I also had real pains to deal with, in the form of the gadflies and socialites
57 and whatever else they put on the planning committee. The worst part of the whole routine was
58 the walkthroughs, which were invariably repeated and lengthy, because the various calendars of
59 these "important" people were always so full and they could just NEVER get everyone together
60 at the same time. In order to make these people feel important during these walkthroughs, we
61 usually gave them individualized keycards that let them access special parts of the Miller Tower

62 – nothing super-secure, but they’re able to go up to the roof for an incredible view of the city.
63 The keycard codes usually expired after 48 hours, so there wasn’t a real long-term security risk.
64 These “planning” folks were never satisfied to sit back and let us security professionals do the
65 work. Oh no. They always had to be “in on” every detail.

66 Berkley De la Porta, who’s always co-chair of the planning committee, was the
67 ringleader of the walkthrough for the Halloween gala last year. De la Porta and I must have
68 walked the building a dozen times throughout the summer and early fall of 2022. Every time, De
69 la Porta asked about the same parts of the plan and the physical plant: How many guards are you
70 going to have at the door? How many guards are you going to have on the floor? How many
71 guards at each painting? De la Porta was really big about the paintings this last year. Apparently,
72 somebody had the bright idea to take three priceless works that weren’t even for sale and display
73 them during the auction for reasons surpassing my understanding. De la Porta said everything
74 had to be perfect for the paintings. I told De la Porta that I was thinking of trying to find some
75 kind of encasement for them that could roll from the vault to the floor without anybody having to
76 touch them and from which they couldn’t be removed without a bunch of work (the high society
77 version of those annoying plastic boxes the drug store keeps everything in these days). De la
78 Porta went through the roof – said, “I am not bringing my...” portrait of a penguin eating
79 blueberries or whatever De la Porta said, “...to sit in a big plastic case from which it couldn’t be
80 quickly removed if necessary.” I pointed out that the painting wasn’t going anywhere, and De la
81 Porta got flustered, and exclaimed, “Who said they were going anywhere? I just don’t want the,
82 uh, plastic to affect the lighting! There will be absolutely nothing attached to the paintings, and
83 you’re not going to have all those goons of yours standing around blocking people’s views.”

84 I told De la Porta that the security associates that De la Porta was referring to weren’t
85 “goons,” but rather most comprised of highly trained members of local police departments who
86 were professionals earning a little extra cash for the family vacation or their kids’ piano lessons.
87 De la Porta lost it again and said, “That was the next thing I was going to talk to you about –
88 those goons do not set the right tone. I want you to use some of those nice young people who
89 you normally have checking tickets downstairs, I want them to be the ones handling the art and
90 artifacts for the entire night. People are tired of being scared by armed guards at these events.”
91 This went on for a bit. I pointed out that nobody had ever reported being scared before, and that
92 we had used the same security plan without incident for years, yet De la Porta insisted that they

93 knew a goon when they saw one. We'd never had a problem in the past and wanted to keep that
94 streak alive. But to be candid, De la Porta's tantrum finally wore me down.

95 I figured that my guards would still be downstairs, so nobody could make it to the street
96 without real opposition. It just wasn't worth the constant fighting with the adult temper tantrums
97 De la Porta kept having. We were on the 40th floor outside the Command Center and the vault
98 when De la Porta announced De la Porta wanted to walk the whole event hall again to see *exactly*
99 where my guards were going to be at every minute, and how many guards would be in each
100 location at any given time. I couldn't take it anymore. I snapped at De la Porta, "You know, you
101 have such an eye for this. I'm really beginning to think maybe I've just lost my edge and that
102 you would have much better insight into security than I do. And because I have such...unique
103 feelings for you, I'm going to do something I never do." And I did – I gave De la Porta a copy
104 of my tac plan for the Halloween charity gala, which had our security timeline, guard
105 deployment, and the security contingency plans written out. De la Porta took the tac plan and
106 clutched it to De la Porta's chest. Then De la Porta leaned in as if about to hug me or something
107 – one of my hands went instinctively to my weapon, the other to block De la Porta's approach.
108 De la Porta shrank back as I said, "You must be joking!" perhaps a bit uncharitably.

109 I had been trying to telegraph for some time that the walkthrough was over, but I couldn't
110 seem to get De la Porta's attention away from the October 31, 2022 tac plan. Finally, I pushed
111 for the elevator. It came – De la Porta did nothing. I coughed. Finally, I reached in and
112 announced, "Express to the lobby for one!" De la Porta looked startled and actually said
113 something that sounded like "Thank you."

114 But it was too good to be true – De la Porta hadn't got but one foot in the elevator when
115 De la Porta stepped back out and whispered, "One last thing. There's one thing I've always
116 worried about..." I stepped back and said, "There's only one other person here on this floor
117 with you. I don't think you have to whisper." De la Porta straightened up and said, "Well, I've
118 always been concerned about the heliport. It seems like such a vulnerability. How can we be
119 sure nobody will land on the roof during the charity gala and rob us all blind?"

120 I had to chuckle. De la Porta actually seemed to think we were in some sort of fictional
121 universe. I told De la Porta that I had never liked the heliport myself but that there was nothing
122 to worry about. I said that when I came on board, I insisted that they reinforce the entrance from
123 the helipad to the building with two armored doors that could only be opened with an extra

124 special keycard or electronically from the control room. “It would take the crew from a local
125 firehouse, a couple of axes and a Halligan, and about twenty minutes to hack through those
126 doors,” I added, “so I think we’re safe.” De la Porta nodded and weirdly repeated what I said,
127 like De la Porta was trying to commit what I had said to memory. For a supposed “tech genius” it
128 all seemed a bit out of character, but De la Porta is nothing if not quirky.

129 Sarcastically, I said, “I’ll put a big post-it note that says “NO!” over that button in the
130 Command Center so nobody makes any mistakes if that will make you feel better.” De la Porta
131 punched the button for the elevator (which had left) and said, “Oh yes, that’s a very good idea.
132 Make sure that your replacement guards are very well instructed not to open the door for
133 anybody.” “You bet. See you later,” I said as the elevator doors finally closed.

134 I have spent a lot of time with a lot of different kinds of people but give me a serial killer
135 any day over that Berkley F. De la Porta and the yacht riding folks! I, of course, was pulling De
136 la Porta’s leg a bit. There had been talk about some kind of reinforced door at the helipad at
137 some point but the building manager never got around to implementing it. The helipad was
138 secured by one of the regular doors used everywhere else in the Miller Tower stairwells.
139 Anybody looking at it could tell that one good kick was all it was good for, and I imagine it
140 would stop an intruder for all of about thirty seconds.

141 De la Porta must have called me least three times during the week leading up to the Sohi
142 Children’s Hospital Halloween charity gala. Giving De la Porta that tac plan was the dumbest
143 thing I’d ever done. De la Porta kept wanting to go over it and make sure that our people were
144 going to be deployed just like in the plan. The night before the charity gala, I remember joking
145 with De la Porta. I said, “You know, De la Porta, if the security isn’t up to snuff you can just
146 shoot me, how does that sound?” There was an awkward pause – too long of a pause – before
147 De la Porta replied, “Oh don’t be silly! Of course, I hope you won’t be hurt in all this.” I said,
148 “Great, we’re all done. See you tomorrow.” De la Porta responded, “Oh no, I won’t be there
149 tomorrow. I have a sudden emergency.”

150 I actually felt bad for a second (silly me) and told De la Porta that I hoped everyone was
151 alright. De la Porta seemed very chipper and just said, “Yes, of course, everything will be just
152 fine. I just have to go to, uh, the place where my sister lives because she’s having a little
153 surgery. Minor really. But you just never know, right? Now, it’s just very important that you
154 follow the plan to the letter because I won’t be within several states during the entire time of the

155 event. Quite a distance away, you see?” At the time I thought, “What a relief! Finally, a night
156 without De la Porta up in my business!”

157 But to keep the boss happy I said, “I hope you’ll be very involved next year, you’re so
158 important to what happens here.” De la Porta replied, “I certainly am, aren’t I? You could
159 almost call me a mastermind.” I laughed to be polite and ended the conversation.

160 The big day arrived at last. On October 31, 2022, we had our tac briefing and everybody
161 got their assignments. Another one of the “efficiencies,” which we received from De la Porta’s
162 company MSIG, was quite possibly the worst handheld radio system in history. Our events were
163 always quiet – just like Santa Ivo City itself – so there’d never really been an issue, but
164 somewhere a troop of school-aged scouts or a sleepover was looking for their toy walkie-talkies.
165 I handed them out, along with those in-ear-earpieces. They didn’t actually connect to our radios,
166 of course, but I’d discovered the effect on the crowd was pretty good. They liked indulging
167 themselves that they had their own private Secret Service to protect them from who knows what.

168 To be honest, we didn’t have a lot to do until it was time to bring out the artwork,
169 jewelry, and other items for each individual auction. While the servers and kitchen staff were
170 busy prepping cocktail trays of food, I monitored the security cameras from the Command
171 Center. It was all quiet, as expected. According to the tac plan, the only actual tense portion of
172 the evening was when we were transporting the auction items. We had to open the vault to
173 retrieve the artwork and other auction pieces (it had all been delivered to Miller Tower in an
174 armored truck around dawn), transport them to the event hall for auction, and then bring the
175 pieces back to be stored in the vault for the remainder of the evening. I had decided that after all
176 the items were secured, that vault was not opening back up until the armored truck returned to
177 deliver the items to their new owners. De la Porta’s wishes notwithstanding, I had my best
178 “goons” monitoring the 40th floor and the transport of the auction items while I stayed in the
179 Command Center.

180 Nothing eventful happened during the silent auction’s cocktail hour from 6:30-7:30pm.
181 By 8pm, all the items were successfully transported to the vault and the vault door was locked. It
182 was supposed to be smooth sailing from there. I went to the kitchen and asked one of the
183 waitstaff (I later learned this person’s name is Parker Orlov) to have someone bring a tray with
184 some food down to the lobby for my crew, and I sat in the Command Center casually watching
185 the security camera footage while I had myself a quick bite to eat. As I was eating, I noticed that

186 the screen for the camera on the roof was cutting in and out. I figured at the time it was just more
187 glitchy tech from MSIG. Eventually, the security footage stopped cutting out and I couldn't
188 believe my eyes! There was a helicopter on the helipad! Our security policies require prior
189 authorization to land on the helipad, and no one had called or cleared a landing with me.

190 I radioed to my crew that we had a potential security breach, but I don't know if anyone
191 received my call. After nothing but silence from the radio for what seemed like hours, though I
192 know it was likely just a minute or two, I decided I would leave the Command Center and
193 investigate the roof myself. I checked the clock in the Command Center, it read 9:13pm.

194 As I opened the door to the Command Center, I saw three figures in dark clothes rushing
195 at me. They were all in the same dark pants, dark boots, and some sort of long-sleeved dark
196 shirts. I distinctly remember one was wearing a black ski mask (how cliché, right?). Another was
197 wearing a cheap Halloween mask that was probably some Hollywood horror flick villain. I
198 remember that person in the horror mask yelled, "You're going to have to get rid of that guard,
199 P! If you don't, you know what happens!" At least I think that's what the person in the horror
200 mask said, because the mask did muffle the words a bit and it happened so fast. Then the third
201 person, P (I assume), who was wearing the mask that the police later showed me (Exhibit 23),
202 screamed like some sort of animal and punched me in the side of the head with something hard.
203 It wasn't just knuckles. I've been in a plenty of fist fights; and this was something much harder
204 than human skin and bones. The lights went out immediately.

205 I don't know how long passed by. At some point I woke up. I was out so cold they
206 hadn't even bothered to restrain me or anything, just dragged me into the vault. I don't know
207 how they could have accessed the vault. Unless you know how the security system works, there
208 is no way you can get in, even with explosives. There is a very specific sequence that is required
209 to enter the vault. If you don't put in your security card, handprint, and retinal scan in that order
210 and within 10 seconds from start-to-finish the system will lock down and send an emergency
211 message to the Santa Ivo Police Department. If the system locks down, an alarm sounds in the
212 Command Center as well. Not even I, the director of security, could override the emergency alert
213 system once the alarm was activated. The vault security system was the one thing that MSIG got
214 right.

215 I noticed that the person wearing the horror mask had my gun tucked into their
216 waistband. I thought for a second about just playing dead until they left, but there was no way to

217 know what the robbers intended to do with me. I took a couple of deep breaths and shifted so I
218 could raise up off the floor and propel myself into Horror Mask at the same time, grabbing for
219 my gun. I clearly surprised Horror Mask. I tackled Horror Mask and we both went to the floor.
220 My gun went clattering across the floor. Horror Mask and I were wrestling on the floor
221 exchanging punches. Horror Mask's disguise was knocked to the side of their face and I was able
222 to clearly see the face underneath. Not surprisingly, by this point the other two robbers must have
223 heard the commotion and realized I was conscious because they ran in the vault. The robber in
224 the ski mask kicked me once or twice in the ribs. But the third one, the one wearing the mask the
225 police recovered (Exhibit 23) jumped on top of me and started pummeling the back of head and
226 face. Once again, something metal was in or on their hand because it was a lot harder than a
227 human fist. I remember my attacker screaming "Get off! If this gets screwed up then I am..." and
228 then last thing I remember is feeling someone grab my head and slam it into the cement floor of
229 the vault.

230 I woke up, albeit about two weeks later. It was another week before I was off the
231 ventilator, and then two more weeks before I went to an inpatient rehab for six months. I never
232 thought that the best day of my life would be the day they took me off the feeding tube and I got
233 to eat again for the first time in a month. The rehab people worked wonders, but there was only
234 so much they could do. The attackers left me to die on the floor of the vault with a ruptured
235 spleen, a fractured skull, and subdural hemorrhage. At first, I couldn't even move one side, and
236 speaking was hard, not that I had anything much to say since I couldn't remember anything at
237 first, especially short-term. But with months of work that's still ongoing, I'm walking on my
238 own again, and you can just barely notice my limp. My speech and vocabulary have come back
239 entirely, which is a relief – all those years doing the Times crossword working midnights with no
240 cases paid off, apparently.

241 Some of my memory of the details of that night might be fuzzy, but not much. I still
242 clearly remember Horror Mask's face. I remember when I was sitting in my hospital bed
243 watching Blitz News Network and my attacker's face appeared on the screen. The news anchor
244 said that face belonged to someone named Memphis Raynes and they were still at-large. The
245 story went on to say that the police only ever arrested one of my attackers. Someone named Poe
246 Cameron. I didn't recognize their face. But then I didn't see under the other two masks that
247 night. But I did later hear a recording of Cameron's interrogation played on Blitz News

248 Network's coverage of this case. And I am certain that Poe Cameron's voice is the voice I heard
249 on Halloween Night at Miller Tower from the person that jumped on top of me and was
250 punching me with the object in or on their hand. I never heard the robber in the ski mask talk.
251 But the one wearing the mask recovered by the Santa Ivo police department (Exhibit 23), is
252 definitely Poe Cameron. Even through the mask, I know the voice I heard was Cameron's voice.

253 I am familiar with following exhibits:

254 Exhibit 1 is one of the invitations for the October 31, 2022 Sohi Children's Hospital
255 charity gala at Miller Tower. I saw a whole stack of them sitting on the counter of the 40th floor
256 kitchen in Miller Tower in the week leading up to the charity gala. It has not been altered in any
257 way from when I saw them in the kitchen.

258 Exhibit 2 is the auction brochure for the Sohi Children's Hospital charity gala that was
259 held at Miller Tower on October 31, 2022. The brochure has not been altered in any way from
260 when I saw a copy. There was a stack of these brochures right next to the stack of invitations on
261 the 40th floor kitchen counter of the Miller Tower. It has not been altered in any way since when
262 I last saw them in the kitchen. All of the items listed as auction items and the three display only
263 Morisot paintings shown in the brochure were secured safely in the Miller Tower 40th floor vault
264 before I was attacked on October 31, 2022.

265 Exhibit 3 is a diagram of the 40th floor of the Miller Tower. It accurately depicts the 40th
266 floor as it existed on October 31, 2022 during the charity gala.

267 Exhibit 5 is a picture of a security keycard for Miller Tower. This keycard is required to
268 access the secure areas of Miller Tower's 40th floor and roof.

269 Exhibit 23 is the mask that I saw my attacker, the one that was referred to as "P," wearing
270 on October 31, 2022. The one that knocked me out in the vault.

271 Exhibit 26 is a photograph of person that was wearing the horror mask on October 31,
272 2022. According to the news that person's name is Memphis Raynes. But I had never seen
273 Raynes before October 31, 2022.

274 Exhibit 27 is an accurate copy of my medical records.

275 I swear or affirm the truthfulness of everything stated in this affidavit. Before giving this
276 statement, I was told I should include everything that I know may be relevant to my testimony,
277 and I followed those instructions. I know that I can and must update this affidavit if anything
278 new occurs to me until the moment before opening statements begin in this case.

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/s/EMORY SANDS

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Duly Subscribed and Sworn By Me:

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/s/ALEX JIMENEZ

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Notary Public