

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss,

LAND COURT DEPARTMENT
MISC CASE NO. 24 MISC 0000507

CROSSROAD PRESENTS, LLC

Plaintiff,

v.

HOLOCAUST LEGACY FOUNDATION, INC.

Defendant.

AFFIDAVIT OF EDWARD HOLSTON

I, Edward Holston, state the following on personal knowledge:

1. I am a Security Director for Crossroads Presents, LLC.
2. I have worked in the field of event security for approximately forty years.
3. I have provided security services for events at the Orpheum Theatre since approximately 1985.
4. Since at least the Boston Marathon bombing in 2013, around which time there was also a spate of vehicle ramming attacks where motorized vehicles mow down people in crowds, in addition to metal barricades, around three hours before doors open, Orpheum Theatre security personnel have placed a manned vehicle on Hamilton Place at the intersection of Tremont Street, perpendicular to Hamilton Place to prevent vehicular access to Hamilton Place, where many people are waiting in a confined space for access to Orpheum shows. Security personnel are available to move the vehicle to allow authorized access.

5. This is done to prevent any vehicle from accelerating down Hamilton Place and striking people in the alley. We have bag checks set up in Hamilton Place and walk through metal detection. The area is crowded with people before shows. It is a matter of best security practices to do this.

6. If a vehicle were placed further down Hamilton Place toward the Suffolk University Parking garage, not only would it limit the area available for bag checks and walk through security screening, it would allow such a vehicle to accelerate down Hamilton Place causing potential mayhem. That sort of speed is less likely for someone who is stopped by a vehicle at the corner.

7. It would put public safety at risk to not post a manned vehicle perpendicular to Hamilton Place at the intersection of Tremont Street on event days at the Orpheum Theatre.

SIGNED UNDER PENALTIES OF PERJURY THIS 25th day of September 2024.

/s/ Edward Holston
Edward Holston

Signed w/ approval

/s/ Alan E. Lipkind
Alan E. Lipkind (BBO #547838)

CERTIFICATE OF SERVICE

I, Alan E. Lipkind, hereby certify that on September 25, 2024, a true copy of the above document was served by email on counsel of record by email.

/s/ Alan E. Lipkind
Alan E. Lipkind (BBO #547838)

4876-8985-5209.1