

Exhibit G

IN THE UNITED STATES DISTRICT COURT
FOR THE STATE OF ARIZONA

Stephen Aiken and Deborah Aiken,
Plaintiffs,
v.
Town of Sahuarita, et al.,
Defendants.

Case No. 4:24-CV-00199-RCC

AFFIDAVIT OF JUAN ZAMORA

STATE OF ARIZONA)
) ss.
COUNTY OF PIMA)

I, former Lieutenant Juan Zamora, being first duly sworn upon oath, depose and state as follows:

1. I was previously employed as a Police Officer with the Sahuarita Police Department, badge number SP109.

2. I am a certified peace officer in the State of Arizona, having completed the Arizona Peace Officer Standards and Training (AZ POST) certification process.

3. I was employed in law enforcement for 22 years, and I am familiar with our departmental policies. I am currently retired.

4. I have personal knowledge of the facts contained in this affidavit based upon

1 my own observations, as well as the review of the supplemental narrative I prepared in this
2 matter, and Sgt. Heath's department-issued body-worn camera (BWC) footage taken on April
3 19, 2023 (Axon Body 3 X6030386B).

4 5. At the time of this incident, I was serving as a Lieutenant with the Sahuarita
5 Police Department, where I had been employed for 20 years prior to my retirement.

6 6. On April 19, 2023, during evening hours and while on duty in full uniform and
7 operating a marked patrol vehicle, I was partnered with Sergeant Eric Heath who was, at that
8 time, a sergeant-in-training. We responded together to 1124 W. Golden Meadow Path,
9 Sahuarita, Arizona to a 911 domestic violence call for service.

10 7. After arrival on-scene, we learned from officers more details regarding the
11 nature of this particular domestic violence call for service based on reporting party (the
12 original 911 caller) statements, the observations of officers who had arrived on scene before
13 myself and Sgt. Heath, as well as my own on-scene observations.

14 8. It was reported to me that a male voice had been heard yelling, "You don't
15 respect me," and a female voice yelling, "No, calm down...", followed by a crashing sound.
16 The 911 caller advised that the residence displayed a white notice on the front door indicating
17 oxygen use, which confirmed we were at the correct location as the residence at 1124 W.
18 Golden Meadow Path had such a placard.

19 9. Sergeant Fruge was speaking with a male, later identified as Steve Aiken,
20 through a closed window next to the front door. Fruge explained why police had responded
21 to the residence and why the officers wanted to check on the welfare of those in the residence.
22 Steve Aiken identified himself as a retired police officer and repeatedly refused entry into the
23 residence, would not open the front door, and also refused to summon his wife, who Aiken
24 claimed was asleep. At that time, it remained unknown who else was in the residence.

25 10. All of this caused me concern for Mrs. Aiken's welfare and safety. Mr. Aiken
26 was resistant to providing meaningful information about who all was in the residence, he
27 refused to allow us to confirm the welfare of his wife who we knew to be in the residence,
28 and he used verbal and physical actions to prevent us from properly verifying the safety of

1 all occupants inside the residence, and as former law enforcement, it was reasonable to
2 believe Mr. Aiken had weapons in the residence. The totality of the reporting party's
3 description of the domestic violence incident also concerned me that Mrs. Aiken and other
4 persons inside the residence might require emergency aid, and that it was now necessary to
5 discuss her welfare and safety face-to-face with her, and in a setting where she felt free to
6 share with us what had happened, or was happening, outside the presence of Mr. Aiken.

7 11. Based on my training and experience, it is common for victims of domestic
8 violence to initially deny they have been assaulted, especially when the suspected abuser
9 remains present or in close proximity, which was the case here. It is also common for a
10 potential victim in Deborah Aiken's situation to fear that complaining to police might
11 expose her to likely future harm at the hands of a hostile aggressor, in this case, Mr. Aiken,
12 who would be in a position to retaliate for the domestic violence report once police left the
13 scene.

14 12. Based on all of the above, I determined exigent circumstances existed to enter,
15 check welfare, and provide emergency aid as necessary.

16 13. While awaiting a breaching RAM, officers were finally able to contact Deborah
17 Aiken, who appeared at the door but refused to open it.

18 14. Upon the RAM's arrival, I observed both Steve Aiken and Deborah Aiken near
19 the front door, still refusing to open the door or allow for a separate interview of Deborah
20 Aiken outside the presence of Mr. Aiken. Their actions made it apparent to me that the Aikens
21 were not going to open the door for officers to conduct a proper interview to ensure that those
22 inside, including Mrs. Aiken, were not under duress, or injured. I directed immediate breach
23 to prevent barricading or arming by Mr. Aiken and to allow for Deborah Aiken's safe
24 extraction from the residence, so we could speak to her out of the presence, and sight, of Mr.
25 Aiken.

26 15. Sergeant Heath breached the door with one strike, and the door appeared to
27 make contact with Deborah Aiken's left arm. I yelled for Mr. Aiken to raise and show his
28 hands, which he did.

16. Officers entered, separated the Aikens, and conducted a sweep to locate other

occupants inside the residence. The sweep revealed only the Aikens were present.

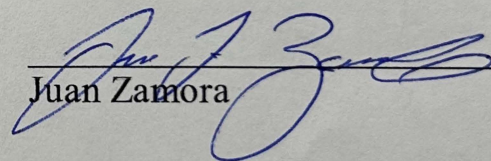
17. Officers noted the residence was in disarray with broken glass on the living room floor and in the master bedroom and bathroom, displaced furniture including couches at odd angles to each other, and a remote control on the floor with the battery cover off.

18. I explained to Mrs. Aiken the reasons for forced entry. This activity and exchange is contained on the Fruge body worn camera footage (DEF 128) at video time 23:36 to 27:27 (located at the bottom of the video), and clock time of 22:06:51 to 22:10:43 (at the upper left of the video).

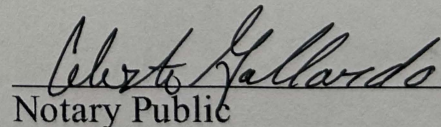
19. Sgt Heath spoke with Mrs. Aiken in an interview conducted outside the presence of Mr. Aiken, and she stated that she had not been a victim of domestic violence or assault. Based on Mrs. Aiken's information, Plaintiff Stephen Aiken was not arrested or charged, and neither of them were removed from the residence.

FURTHER AFFIANT SAYETH NAUGHT.

Executed this 21st day of August, 2025.


Juan Zamora

SUBSCRIBED AND SOWN TO before me this 21 day of August, 2025, by Juan Zamora.


Notary Public

My Commission Expires

March 10, 2029

