EXHIBIT 4

AFFIDAVIT OF LARRY OFFUTT

THE STATE OF TEXAS §

COUNTY OF DALLAS §

Before me, the undersigned notary personally appeared Larry Offutt, who being duly sworn did depose as follows:

- 1. My name is Larry Offutt. I am over the age of twenty-one (21), of sound mind and body, and competent to make this affidavit. The statements set forth in this affidavit are true and correct and based upon my personal knowledge.
- 2. I live at 6038 Bryan Parkway, Dallas Texas, 75206. I live approximately 0.26 miles from the Aldredge House.
- 3. I have lived in or very near the area that is now designated the Swiss Avenue Historic District ("SAHD") for over sixty years.
- 4. I am one of the founders of the Historic Preservation League, which is now two distinct organizations: the Swiss Avenue Historic District Association ("SAHDA") and Preservation Dallas. I have been and remain intimately involved with the development of the historic district.
- 5. In the 1950s, my parents and grandmother moved our family from a small cotton town north of Dallas (Richardson) to what was then considered a "safe" neighborhood in what is now part of SAHD. At the time, the neighborhood offered good schools, stores, and entertainment within walking distance, along with a reliable and safe public transit system.

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- 6. However, around the early 1960's the neighborhood began to experience a rapid physical and socio-economic decline. I had to give up my paper route (encompassed by parts of Live Oak, Gaston Avenue, Bryan Parkway, La Vista and Swiss Avenue) because it became too dangerous for pedestrians to be on the streets alone.
- 7. Over time, I rented my first home on my own in the area a two-hundred square foot garage apartment on Swiss Avenue, followed by a duplex at Live Oak and Ross (one block from the SAHD), and then an apartment at the corner of Glendale Street (part of SAHD) and Gaston Avenue.
- 8. In approximately 1968, I purchased my parents' family home at 6201 Bryan Parkway, Dallas Texas, 75214..
- 9. Because I have lived in or very near the SAHD for the last sixty years, I have personally experienced the decline of my neighborhood. I have observed real estate agents refusing to show properties in the SAHD, banks refusing to provide mortgages or improvement loans within SAHD, and insurance companies refusing to write coverage for homes within the SAHD.
- 10. Many of the City's leaders publicly stated that the "smart" investment was to own and rent in East Dallas and not reinvest in the property.
- 11. In the late sixties/early seventies, a very small group of determined homeowners came together to save "our neighborhood" (SAHD) and its important history. The group was made up of longtime residents providing political and monetary resources as well as younger "urban pioneers" all individuals with dreams of taking on the "established patterns of decay" and the ideology of "smart investment" in the area. The Aldredge

Family joined these efforts in its very early stages. Our group went door to door promoting revitalization in the area.

- 12. A revitalization slowly took place. I am proud to say that many of my friends have lived their lives in SAHD, where they raised their families and saw their dreams of revitalization occur.
- 13. The revitalization of our neighborhood, and the use of the Aldredge House for the community, was legitimized with the writing and development of the first historic ordinance in Dallas. At the time the Aldredge House ordinance was drafted, we did not have many of the refined tools and wording that we now have in our city codes and statutes. We worked with the definitions and zoning terms available at the time and strove to be fair to all property owners.
- 14. A <u>large and key part</u> of our SAHD effort, which was shared by many of my activist neighbors, specifically hinged on the preservation of the Aldredge House and its use by the Dallas County Medical Society Women's Auxiliary ("DCMSA"). The Aldredge House became a place to show case Swiss Avenue, to invite prospective buyers to the neighborhood, and to introduce outsiders to an "inner-city" neighborhood of Dallas.
- 15. The Aldredge House, and its operation as a public event venue, along with it being the "living room" of our neighborhood, was and still remains a vital part of our continued inner-city revitalization.
- 16. While revitalization has taken place throughout the SAHD, the neighborhood is under constant pressure to maintain, protect and further establish itself. An example of this threat is the fact that, as set forth in a Dallas Police Department and Dallas Morning

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News crime study, the number one center of crime in Dallas is less than one mile from Aldredge House, and just blocks from the boundaries of the SAHD. See Ex. __.

17. Furthermore, the Aldredge House is located just a few hundred feet from a public park in which homeless individuals sleep, urinate, litter, change clothing, and where sexual trysts occasionally occur — on weekends in particular. Furthermore, the cross streets are a thoroughfare from one high crime area with prostitution, drug sales, and drug usage to another area (Ross to Gaston to Columbia). Moreover, at times individuals consume alcohol in their jazzed up cars while parked on the street adjacent to the park and blare loud music.

18. This crime and sordid activity happens in the middle of SAHD in the immediate vicinity of the Aldredge House, and has transpired for years. This activity is a reality of part of living in a diverse, socio-economic, inner-city neighborhood.

19. I have read Barbara McDaniel's Application to the Board of Adjustment to Set a Compliance Date for the Nonconforming Use at 5500 Swiss Avenue ("Application"). Based on my personal knowledge of the area as a resident, who has lived here for over sixty years, the allegations that the DCMSA's use of the Aldredge House for social events is a major source of criminal activity in the area is inane at best.

20. Based on conversations I have had with the founders, neighbors, supporters, and planning and zoning staff at the time of the SAHD development and the writing of the historic ordinance, my intent, and their intent, was always to use the Aldredge House as a public and private event venue. The Aldredge House, as run by the DCMSA, was intended to be an historic venue that a) honored the wishes of the Aldredge family to preserve an exterior and interior jewel for future generations, b) supported the goals and Page 4 of 6

programs of the DCMSA with a "home" to provide services to the SAHD and community at large, c) provided a place where other "community" groups could have a "living room" from which they could grow and serve, and most importantly, and d) served as an AMBASSADOR to all of Dallas (and the world) as an example of what can be accomplished in the inner-city.

- 21. It was always understood, acknowledged and agreed during the time leading up to the Aldredge House receiving its special use ordinance, that the house would be used for income-producing events. These events (weddings, receptions, seminars, teas, luncheons, and parties) were intended to be activities permitted by the Ordinance and were relied upon in order to maintain and protect the historic property.
- 22. Swiss Avenue is also the go-to place for bicycle races, runs to support treatment for Alzheimer's, and the Dallas marathon.
- 23. The Aldredge House has been a great neighbor to me in general and to the community. The DCMSA has recruited people looking to buy homes in "our town". The DCMSA has also raised revenue for the SAHDA. The DCMSA makes the Aldredge House available to the SAHDA for its annual Mother's Day tour, a principal money raising event. The DCMSA also makes Aldredge House available for the monthly meeting place of the SAHDA. A similar meeting facility that SAHDA would use would likely cost several hundred dollars each month and thousands of dollars each year.

FURTHER AFFIANT SAYETH NOT.

Name:
Title: Propoley Queen & Rosident Swiss Are Historicalist

COUNTY OF Dallas

BEFORE ME, the undersigned authority, on this day personally appeared Larry Offutt known to me to be the person who executed the foregoing instrument and he acknowledged to me that he executed the same for the purposes and considerations therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 6 day of October 2015.



NOTARY PUBLIC IN AND FOR
THE STATE OF Texas

MY COMMISSION EXPIRES: 5