

THE STATE OF NEW HAMPSHIRE

GRAFTON, SS.

SUPERIOR COURT

Docket No. 08-E-0294

**B.V. BROOKS, KENNETH F. CLARK, JR., MARISA DEANGELIS KANE, JOHN H. PLUNKETT, DOUGLAS R. RAICHLER, ROBERT G. REED III, AND JOHN STEEL III,**

**Plaintiffs**

v.

**TRUSTEES OF DARTMOUTH COLLEGE,**

**Defendant**

**AFFIDAVIT OF PLAINTIFF JOHN STEEL III**

Now comes John Steel, upon oath, and states as follows:

1. I am a Plaintiff in the above-entitled matter.
2. Paragraph 30 of the Petition alleges as follows:

"For 117 years, the Association and its members (including, but not limited to, the Plaintiffs) have taken countless actions in reliance on the Defendant's agreements and promises that the alumni would have and preserve the right to elect one-half of the non-ex *officio* trustees, including: (a) amending the Association's constitution to provide for election of half the non-ex *officio* trustees, (b) conducting countless meetings, (c) expending substantial time and resources preparing for and participating in trustee elections, (d) recruiting potential trustee candidates, (e) evaluating their credentials, (f) conducting and voting in trustee elections, (g) nominating Alumni Trustees, (h) paying money to the College, (i) raising money for the College, (j) standing for election as candidates for Alumni Trustee, (k) serving the College as Alumni Trustees, and (l) taking a livelier interest in, and responsibility for, the College's management, curriculum, and finances."

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**BRUCE W. FELMY**

3. I personally have engaged in many of the foregoing activities in reliance upon the College's agreements and promises that alumni would have the right to elect one-half of the elected Board of Trustees, including but not limited to: making contributions over the course of the last 50+ years to the College and to Dartmouth – affiliated organizations, running and getting elected and serving as an Alumni Trustee on the Board, sending all five of my children to Dartmouth, putting Dartmouth in my estate plan, raising funds from others for Dartmouth and serving as an officer of my local Dartmouth Club.

  
John Steel III

On this 13<sup>th</sup> day of August, 2009, personally appeared John Steel III, who took oath before me that the foregoing answers were true to the best of his knowledge and belief.



  
Notary Public