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**THIRD JUDICIAL DISTRICT COURT  
SALT LAKE COUNTY, STATE OF UTAH**

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**OLIVER DEMILLE, an individual,  
SHANON BROOKS, an individual;**

**Plaintiffs,**

**vs.**

**GEORGE WYTHE FOUNDATION, a Utah  
Corporation, DANIEL EARLEY, an  
individual, JULIE EARLEY, an individual  
DIANN JEPPSON, an individual,**

**Defendants.**

**AFFIDAVIT OF ERIN REYNOLDS  
MWANJE**

Civil No. 150908687

Judge: James Gardner

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The undersigned, Erin Mwanje, being first duly sworn, deposes and says:

1. I am over the age of 18 years and am competent to testify in the above referenced matter.
2. I am a graduate of George Wythe University.
3. I received my degrees in 2004 (BA) and 2005 (MA).
4. After beginning my post-secondary education a state University, I transferred to George Wythe University because it offered an alternative educational model that focused more

upon mentorship and the individual and less upon rigid structures and rote learning. I knew I was choosing between an accredited degree, and something I valued more: what I considered to be a statesmanship education.

5. I understood fully and completely that George Wythe University was not an accredited institution; I also understood that its status could affect the marketability of my educational background.

6. Despite its less-than-mainstream status, I still chose to enroll in the school. In comparing my Ivy League Master's degree experience with the degree and experience I received at George Wythe, I can whole-heartedly state that my George Wythe education better prepared me to think, lead and impact the world than did my subsequent Harvard degree. Further, in no way have I found my George Wythe degree to be inferior to my Harvard degree, other than that some schools and jobs require an accredited degree, and I knew of that obstacle all along the way. But even with regards to that point, far more doors have been opened to me, than closed, due to my George Wythe degree and the education it represents.

7. I am completely satisfied with the education I received at George Wythe, and if the school still existed today with the same leadership, I would enthusiastically recommend it. My perspective is that the current George Wythe University reflects very little the experience and leadership I valued and loved as a former student.

8. The quality of education I received is due in great part to Oliver Demille. Oliver taught me how to think, and how to learn in a way that I will be forever indebted to him. I found no professor near his equal at any of the other universities I have attended (one state and two private universities).

9. I am completely bewildered and astonished by the attacks “my university” has levelled at a person I so deeply admire. Firstly because I went to school with those who have leveled these attacks and I find their attacks to be unfounded, duplicitous and absurd in the extreme. Secondly because those publishing the attacks claim to represent the interests of George Wythe graduates, but I have yet to speak to a single graduate (other than those leveling the attacks) who feels the way they do.

10. I have personally read my school’s October 16, 2015 article titled “GWU’s Final Chapter-The Cleansing of Valid Degrees” and it is my firm desire that the article be removed. I firmly believe the article represents the views of no one but its authors’, though it claims otherwise, and I believe its contents are vilifying and unjustified.

11. I believe this article greatly and falsely maligns Oliver Demille and Shanon Brooks.

12. Moreover, even if the authors’ efforts are genuine in trying to preserve the integrity of our degrees I believe the article does far more harm than good.

13. As a case in point, before the publication of the aforesaid article when I mentioned to friends and associates that I studied at George Wythe I only ever received one of the following responses: 1) “What’s George Wythe?” and 2) “I’ve heard great things about that school.” I never received any other response. Since the publication of that letter, a third response has surfaced, “So is your degree one of those that was legitimate, or not?” and other variations reflecting negative press the school has received as a result of what I believe to be unfounded allegations. The overall impact of the attention these people have drawn to the school has been

negative in the extreme, and I feel that rather than serve in behalf of my interests, those who claim to represent me have actually done me damage.

14. As a professional educator and founding director of an online middle school students and parents occasionally ask me about various university options, including George Wythe University. They ask about both my experience there, and whether or not I recommend George Wythe today for their students. Since the “Cleansing of Valid Degrees” email, I have heard only negative comments about the school, whereas before its publication I often heard positive sentiments from parents considering sending their students to George Wythe.

15. In my opinion, Oliver Demille and Shanon Brooks were the pillars of George Wythe University for over a decade. By attacking them I have found it casts a negative light on our entire educational experience.

16. It has come to my attention that George Wythe University is using the alumni as support to keep the articles on their site. In no uncertain terms it is my firm wish that the articles be removed immediately. I was never consulted, although I am quoted on the website and referred to by their faculty as a resource for their students applying to Ivy League schools, which I have found to be in very poor taste.

17. I believe the articles have false and misleading information about Mr. Demille and Brooks and I think they are far more harmful to the school’s reputation than helpful.

DATED THIS 12th day of February, 2016.

STATE OF UTAH

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Student’s Name

COUNTY OF SALT LAKE                    ):     ss  
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The undersigned, Erin Mwanje, being first duly sworn acknowledged and states that the information in this Affidavit of Erin Mwanje is true and correct.

DATED this \_\_\_\_ day of February, 2016.

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NOTARY PUBLIC