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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 STEVEN B. ADAMS,  
PH.D.**

Civil No. 150908687

Judge: James Gardner

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The undersigned, Steven B. Adams, Ph.D., 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 College.
3. I received my degree in 1999.

4. I enrolled in George Wythe College because it offered a classical, liberal arts approach and respected the agency of the individual while provided a high quality educational experience focused on developing the knowledge and skills of individual students.

5. I was informed by Oliver DeMille and others at the college that George Wythe College was not an accredited institution and understood its status could affect the marketability of my educational background for good or ill. My greater concern was to gain marketable skills and applicable knowledge, which I did. I worked in private education during and following my graduation. I then started both private and public schools in Idaho, and then consulted on the startup of schools in several states. I worked as the Director of Charter, Virtual, and Home Education for the Florida Department of Education, and as a contract worker for several other states and the U.S. Department of Education. I was then hired by Brigham Young University – Idaho to assist with the early efforts of the Online Initiative and now work in the Pathway program. I never experienced concern regarding my degree from George Wythe College until the publication of the article by George Wythe University described below.

I disclosed the non accredited status of the college that granted by undergraduate degree when applying to Florida State University and followed their processes to have my knowledge and abilities assessed prior to full acceptance into one of their graduate programs. I then completed a Masters of Science in History and Philosophy of Education, a graduate certification in Education Policy, and a Ph.D. in Foundations of Education.

6. To willingly participate in the unique educational program at George Wythe College, I gave up two full tuition scholarships at Idaho State University (one academic and one

leadership) as well as my G.I. Bill benefits to enroll in the school, and I was extremely happy with the education I received there.

7. I attribute a significant amount of the quality education to Oliver DeMille. He was and is a knowledgeable and skilled instructor and mentor. While he approached undergraduate education differently than professors I had at Idaho State University, he was similar in many ways to professors I had in both of my graduate programs at Florida State University. While there were differences between all of these institutions and the instructors in those institutions, they were differences I understood and willingly chose.

8. I am deeply disappointed by the attacks George Wythe University has published online regarding Oliver DeMille.

9. I have personally read George Wythe University'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. While I am not aware of all the details, my personal experience is not consistent with much of what was written in that article regarding Oliver DeMille.

10. I believe this article greatly and falsely maligns Oliver DeMille.

11. Moreover, even if the university's efforts have been genuine in trying to preserve the integrity of my degree I believe the article has done more harm than good.

