

Pete Lowe (13792)
Jonathan Peck (14747)
LOWE LAW GROUP
6028 S Ridgeline Dr. #203
Ogden Utah 84405
T: 801.917.8500
Attorneys for Plaintiff
pete@lowelawgroup.com

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

**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 TAYLOR SMITH

Civil No. 150908687

Judge: James Gardner

The undersigned, Taylor Smith, 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 BA degree in Statesmanship in 2008.
4. I enrolled in George Wythe College because it offered an alternative educational model that focused more upon the individual and less upon rigid structures.

5. I knew George Wythe College was not an accredited institution and 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 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 an amazing educator and an inspiring man.

8. I am shocked and saddened by the attacks “my university” has levelled at a person I so deeply admire.

9. 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.

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

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

12. In my opinion, Oliver Demille was the pillar of George Wythe University for over a decade. By attacking him I think it casts a negative light on our entire educational experience.

13. 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.

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

15. In my personal experience and to my knowledge, NONE of my fellow classmates

who attended George Wythe College during the time I attended (2005-2008) did so contingent upon the school gaining accreditation. We all understood from the outset that while the school was pursuing accreditation, there was no guarantee. We all still willingly and knowingly paid tuition, attended classes, completed the work assignments, and participated in many other school sponsored activities and events - considering the educational experience far more important than the degree.

16. I would not exchange my “unaccredited” degree from GWC and the experiences I had and the lessons I learned during my time there (especially with Oliver DeMille as a mentor) for an accredited degree from any other educational institution in the state of Utah. I consider it outrageous how the GWU board has presumed to misrepresent me and my fellow alumni, especially at the expense of Oliver’s personal reputation. The GWU board most certainly did NOT consult me or any other alumni (to my knowledge) before invoking our “interest” as the primary motive for their actions.

17. In my time since graduation, I have never felt handicapped in any way by my degree from George Wythe College. Rather, that experience has given me many advantages, including an edge in the competitive world of business. Over the last 10 years, I have been a top producing representative and regional sales director responsible for millions of dollars of revenue for various companies. I have hired and trained hundreds of other employees and representatives, and been an active member of the Executive Committee at my current company. I currently work as the Chief Customer Officer for Innoventrum LLC, my chief responsibilities relating to FindACode.com (the leading online medical coding software in the industry, serving nearly half a million unique visitors every month). I have also served as a Republican Party Utah State Delegate, Morgan County (Utah) Precinct Chairman, and currently reside in South Dakota serving my community as an active

member of Custer County Search and Rescue, Argyle Volunteer Fire Department, and Argyle First Responder's unit (operating under Custer County EMS). The education and training I received from Oliver DeMille and other mentors during my time at George Wythe College has been invaluable to me, and has helped me be a better citizen, leader, husband and father, and member of my church.

DATED THIS ____ day of February, 2016.

STATE OF SOUTH DAKOTA)
): ss
COUNTY OF CUSTER)

Taylor Smith

The undersigned, _____ being first duly sworn acknowledged and states that the information in this Affidavit of Taylor Smith is true and correct.

DATED this ____ day of February, 2016.

NOTARY PUBLIC