

<p>DISTRICT COURT, DENVER COUNTY, COLORADO</p> <p>Court Address: 1437 Bannock Street Denver, CO 80202 720-865-8301</p> <hr/> <p><b>Plaintiff(s):</b> WARD CHURCHILL</p> <p>v.</p> <p><b>Defendant(s):</b></p> <p>UNIVERSITY OF COLORADO and BOARD OF REGENTS OF THE UNIVERSITY OF COLORADO, a body corporate</p> <hr/> <p>Patrick T. O'Rourke #26195 Special Assistant Attorney General Office of University Counsel 1800 Grant Street, Suite 700 Denver, Colorado 80203 303-860-5691 303-860-5650 – fax Patrick.orourke@cu.edu</p>	<hr/> <p>Case Number: 06 CV 11473</p>
<p align="center"><b>AFFIDAVIT OF DAVID BRADLEY</b></p>	

The Affiant, David Bradley, deposes and states:

1. I am over 18 years of age and understand the obligations of oath when I provide a sworn affidavit.

2. I have personal knowledge of the matters I will describe in this affidavit. Patrick T. O'Rourke of the Office of University Counsel assisted me in preparing the form of the affidavit, but it expresses my opinions, not the University of Colorado's opinions. I have not been compensated in any way for providing my affidavit.

3. I am a professional artist and have lived in the Santa Fe, New Mexico, area for over 30 years. Before coming to Santa Fe in 1977, I served a two-year tour in the Peace Corps. From 1977 to 1979 I attended the Institute of American Indian Arts (IAIA) in Santa Fe, the only American Indian art college in the United States. While attending the Institute, I served as the student member on the IAIA Board of Regents. I graduated from IAIA in 1979, at the top of my class, with a special award in sculpture.

4. In 1991, I was formally invited to serve as Visiting Professor at the Institute of American Indian Arts (IAIA). I taught painting and sculpture from 1991 to 1993. While teaching at the Institute, I also served as chairperson of the IAIA Columbus Quincentenary Committee.

5. For over twenty years, I participated as a professional artist in the prestigious Santa Fe Indian Market, the largest Indian art show in the country. During this period I won numerous art awards, served as official poster artist for the Market in 1984, and served on the Market's board of directors.

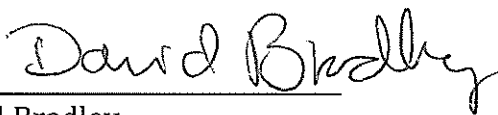
6. I have been prominently involved in an American Indian grass roots movement that resulted in state and federal Indian arts and crafts legislation, including the federal Indian Arts and Crafts Act of 1990, which protects the Indian community from fraud in the Indian Art world.

7. During the August, 1991 Indian Market show, where I had an artist booth, numerous copies of a deceptive and libelous essay written by Ward Churchill, professor at the University of Colorado at Boulder, were circulated at the Santa Fe Indian Market. The essay specifically targeted me and was circulated at my most important professional event of the year, thereby calculated to inflict maximum damage to my reputation and income. Churchill's defamatory essay was circulated during the same week of August 1991 when I began teaching at Institute of American Indian Arts.

8. Before seeing a copy of his essay falsely defaming me, I had never even heard of Ward Churchill. I later learned that Churchill had applied to teach at IAIA a few months earlier but had been rejected by a faculty panel.

9. During his tenure at the University of Colorado, Ward Churchill has irreparably damaged Indian Studies and the Indian community, by teaching and publishing numerous books that lie or distort the truth. His published lies and distortions are then taught as fact to unsuspecting students across the country. If Ward Churchill is reinstated to his position at CU, his reinstatement will further damage the scholarship of Indian Studies. Repairing the damage Churchill has inflicted on Indian Studies and the Indian community will require hard work by many Native scholars and professionals in the future; Churchill's continuing presence at CU as a professor who harms Indian studies and the Native Community would serve only to undermine that work. I believe that Churchill would not have been able to publish his slanderous books, if he had not had his position, and the illusion of scholarship, at CU. Churchill should not be allowed to use the power and prestige of CU to further damage the academic world and the Indian community

Dated this 12 day of May, 2009:

  
David Bradley

STATE OF New Mexico )

)

COUNTY OF Santa Fe )

I attest that David Bradley personally appeared before me on this 12<sup>TH</sup> day of May 2009 to execute this Affidavit. The Affiant executed the affidavit voluntarily and of his own free will.

Dated this 12<sup>TH</sup> day of May, 2009:

WITNESS MY HAND AND OFFICIAL SEAL

Anyta Marie Tapia  
Notary Public

My commission expires: 10/09/2011

