

AFFIDAVIT

Roger Gibson, first being duly sworn, and of lawful age, states the following:

My name is Roger Gibson and I reside at 192 Hastings Way, St. Charles, MO 63301. I have been the Chairman of the Philosophy Department at Washington University for the past seven years. I personally know Dr. Jeffrey Kurtzman; however, only knew him casually until he started teaching in the Philosophy Department in the Fall of 1996.

After the fall semester which started in September of 1996 began, Associate Professor _____ came to see me indicating that she had heard rumors that Jeffrey Kurtzman was involved in a sexual harassment case. Dr. _____ had discussed the matter with other faculty members including _____. _____ also had a document with her when she discussed with me the sexual harassment matter involving Dr. Jeffrey Kurtzman.

After my meeting with _____, I called _____, Chairman of the Music Department, who referred me to Dean Edward Macias. I indicated to Dean Edward Macias what _____ had advised me and asked for clarification. Dean Edward Macias assured me that there had not been a finding of sexual harassment.

After my conversation with Dean Edward Macias, I advised _____ of the conversation and Dr. Jeffrey Kurtzman continued teaching in the Philosophy Department.

Roger Gibson

ROGER GIBSON

Subscribed and sworn to before me this 21st day of April, 1997.

My commission expires:
6-21-1997

Betty J. Humphrey

Notary Public