

7. The training was not comprehensive as stated in the Second Amended Complaint. For example, attendees were not provided the College's entire sexual misconduct policy but, instead, only definitions of key terms. We also were not informed of the changes that were made to the policy in Fall 2014.
8. It is true that Ms. Bossong expressly taught the attendees to prioritize the College's reputation as the hearing panels' most important factor in making its decisions. The importance of the College's reputation was not only a suggestion but was stressed as the paramount concern.
9. The reputation of College seems foremost in any decision. Discussions about why a particular student was not expelled or suspended or a complaint forwarded to the county district attorney's office piggybacked on overloading Clery reports and the College's ability to continue receiving federal financial aid funds. In fact, I questioned how detrimental to the College's reputation would be if only a few of these cases were reported by media outlets.
10. Issues of students' 'pedigree' or a select few were targeted as 'development cases' came to light during our discussions. One example I mentioned took the group back to the 80s when then Zbigniew Brzezinski's child was a student at the College and the special attention and privileges he received when he found himself in troubled situations. Many times the Brzezinski child found himself in trouble but was treated like royalty because his father was national security to then President Jimmy Carter. Those from prominent families receive the utmost attention and protect from the College's administration and faculty.

Signed under the pains and penalties of perjury this 17 day of March 2017.

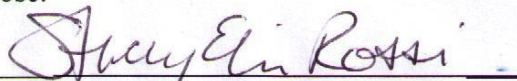
  
BRIAN MARQUIS

COMMONWEALTH OF MASSACHUSETTS

BERKSHIRE, ss.

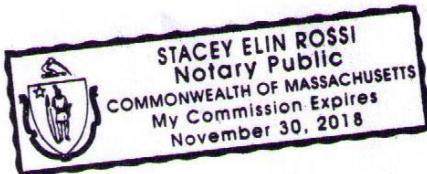
Executed in: Lanesborough, Massachusetts

On this 17<sup>th</sup> day of March 2017 before me, the undersigned notary public, personally appeared BRIAN MARQUIS, personally known to me or satisfactorily proven to be the person whose name is signed above, acknowledged to me that he signed the foregoing instrument voluntarily for its stated purpose.



Notary Public: Stacey Elin Rossi

My Commission Expires November 30, 2018



**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

|                   |   |                                    |
|-------------------|---|------------------------------------|
| JOHN DOE,         | ) |                                    |
|                   | ) |                                    |
| Plaintiff         | ) | CIVIL ACTION NO.: 3:16cv-30184-MAP |
|                   | ) |                                    |
| v.                | ) |                                    |
|                   | ) |                                    |
| WILLIAMS COLLEGE, | ) |                                    |
|                   | ) |                                    |
| Defendant.        | ) |                                    |

**AFFIDAVIT OF BRIAN MARQUIS SUPPORTING  
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

BRIAN MARQUIS deposes and states the following:

1. I have been employed by Williams College since April 14, 2014.
2. My employment with the College was never terminated. I am not a "former employee."
3. Williams College employed me in a dual capacity: In Dining Services on its wait staff and in the Office of Student Life as an Event Assistant. As an Event Assistant, I worked closely with the Campus Safety & Security ensuring all College rules and regulations were adhered to during special functions.
4. In January 2015, Meg Bossong, Director of Sexual Assault Prevention and Response at Williams College, sent out an intent to recruit hearing panelists via the College's Daily messaging service. Important departmental and student messages are distributed, via email, to the College community each morning. Upon receiving the invitation, I reached out to Ms. Bossong expressing my interest and willingness to serve on the College's student judicial board. Having earned a couple of law-related diplomas, I thought this would be a good match both for the College and myself.
5. I attended a Williams College training for sexual assault hearing panels on January 30, 2015. The training was led by Ms. Bossong.
6. All of the statements in the Second Amended Complaint attributed to me as "Bob Mann" are fair and accurate recitations of my statements and of the facts contained therein with one exception. I served on three "mock" hearing panels as part of my training.