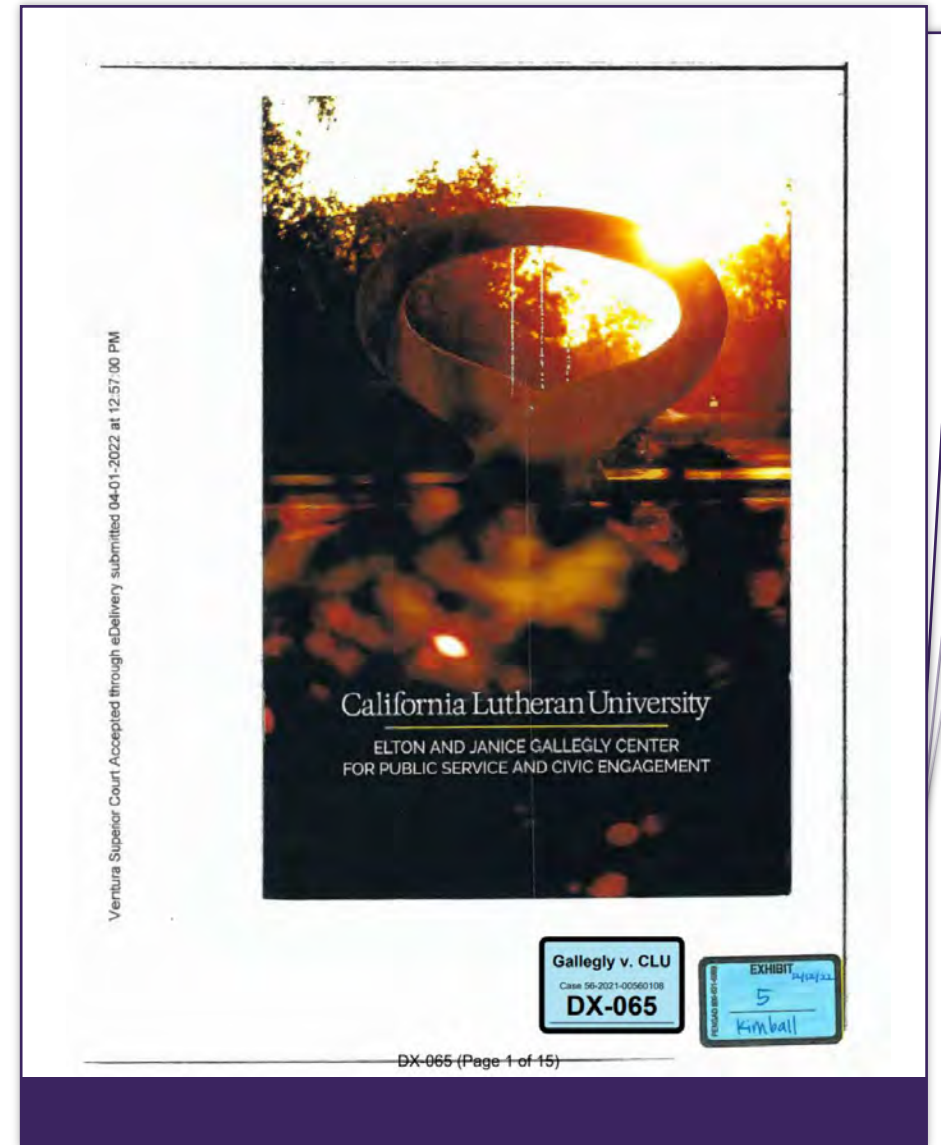
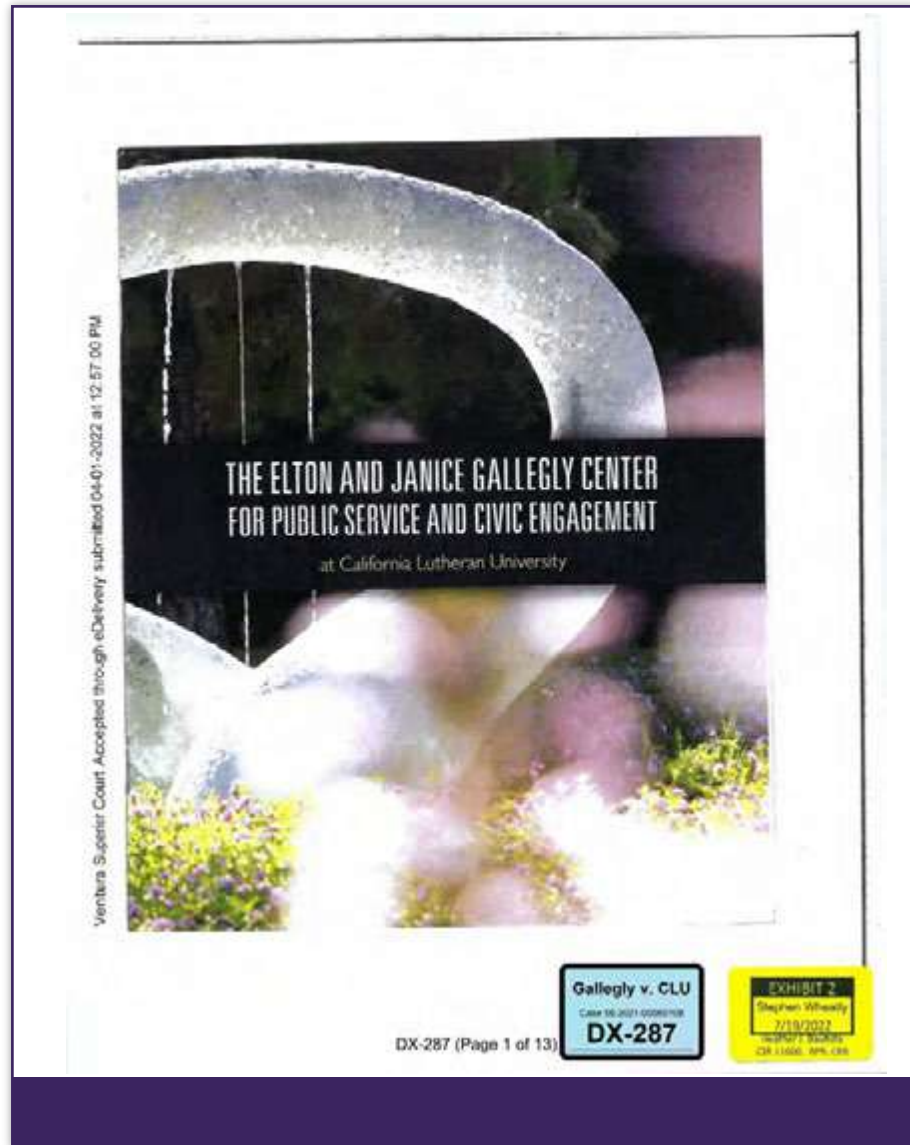


What About These Brochures?



The Brochures Were Sizzle Packages



Steve Wheatly

Q. Could you take a minute and look at Exhibit 2, please, and just generally just describe what it is.

In fundraising parlance, it's called the "sizzle package" or "case statement." This was the first of several

Trial Transcript Day 1 at 70:18-19, 70:24-25

The Brochures Were Inspirational And Aspirational



Lori Varlotta

Q. You would agree, would you not, that the brochures are used to basically provide information based upon which donors wish to donate funds to the university?

A. During my 39 years in higher education, I have always --

Q. My question is a yes-or-no question.

A. It's not that simple. There are inspirational and aspirational pieces. They are meant to inspire donors to give so that the institution can bring to fruition the goals or the program it aspires to create through donations.

Trial Transcript Day 4 at 489:27-490:7

The Second Brochure Was Printed By May Of 2018



Elton Gallegly

Q. Is it true that this brochure was created prior to the dedication so it could be handed out to the folks who attended the dedication?

A. Yes.

Trial Transcript Day 5 at 645:9-12