

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF DAKOTA

FIRST JUDICIAL DISTRICT

New School Communications, Inc. a
Minnesota Corporation,
Blois Olson

Court File No. 19-CX-06-6432

Plaintiffs,

v.

AFFIDAVIT OF
MICHAEL B. BRODKORB

Michael B. Brodkorb, and
www.minnesotademocratesexposed.com,

Defendants.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

Michael B. Brodkorb, being first duly sworn under oath, states as follows:

1. I am a resident of the City of Eagan, County of Dakota. I have firsthand knowledge of the matters asserted herein.

2. I am the author and creator of the internet blog www.minnesotademocratesexposed.com and have been since its inception in June 2004.

3. www.minnesotademocratesexposed.com is an internet based forum dedicated to free speech and open discussion about local, state and national politics, current issues and events, and promoting conservative ideologies. Additionally, www.minnesotademocratesexposed.com is dedicated to a truthful discussion on the activities, statements, and tactics of Minnesota Democrats so as to allow the electorate a full, fair and unbiased evaluation of democratic candidates for office.

4. www.minnesotademocratesexposed.com has been quoted and cited on multiple occasions as a credible source of information by the following news organizations:

- a. St. Paul Pioneer Press;
- b. Minneapolis Star Tribune;
- c. National Journal; and
- d. Associated Press.

5. From its inception until shortly after this lawsuit was served upon me www.minnesotademocratesexposed.com was authored anonymously so the content placed into circulation was not overshadowed, by the readers, with preconceived opinions based upon the background, employment history and reputation of its author.

6. As a result of Plaintiffs' lawsuit against me and www.minnesotademocratesexposed.com I was forced to discontinue reporting on the Humphrey/Rowley story.

7. On December 28, 2005, www.minnesotademocratesexposed.com reported that Hubert H. "Buck" Humphrey, III (hereinafter referred to as "Buck Humphrey") approached the Colleen Rowley campaign for United States Congress (hereinafter referred to as "the Rowley Campaign") with a proposal to do consulting work. It was further reported that Buck Humphrey's proposal was rejected by the Rowley Campaign. See, Exhibit A, attached to Plaintiffs Complaint.

8. At the time of the submission of the proposal to the Rowley Campaign, Buck Humphrey was employed as a "Senior Counselor" with New School Communications, Inc. and had been since March 2005. See, Exhibit A attached hereto.

9. It is my understanding that New School Communications, Inc. is owned by Blois Olson (hereinafter referred to as "Olson"), a Democratic strategist, political commentator and DFL co-editor of the political newsletter Politics in Minnesota.

10. In response to the Humphrey/Rowley story Olson contacted www.minnesotademocratesexposed.com via email as follows:

"I don't know who you are but your story is ABSOLUTELY FALSE. New School Communications does not do any political work, Buck Humphrey may have pursued (sic) a work with Rowley PRIOR to his employment at New School but we do not do any campaign work. I demand a retraction immediately."

Emphasis original. See, Exhibit B, attached hereto.


11. www.minnesotademocratesexposed.com posted Olson's email, in its entirety, within nineteen minutes of its receipt.

12. On December 29, 2005, Olson's attorney, Steven H. Siltan, commenced the current lawsuit against www.minnesotademocratesexposed.com and your Affiant, individually.

13. Upon information and belief, immediately upon service of the lawsuit upon your affiant Olson or his attorney released a copy of the Summons and Complaint to the Associated Press.

14. Olson then used his status as a radio and television celebrity to gain appearances on two radio talk show programs to discuss the lawsuit.

Further your Affiant sayeth not.


Michael B. Brodkorb

Subscribed and sworn to before
me this 30th day of March, 2006.


Notary Public

