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IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF KOOTENAI

DOMINIC SWAYNE, an individual,

Plaintiff,

v.

NORTH IDAHO COLLEGE, a community
college in the State of Idaho,

Defendant.

Case No.: CV28-22-7712

Hon. Cynthia K.C. Meyer

**DECLARATION OF DOCTOR
GREGORY SOUTH IN SUPPORT OF
DEFENDANT’S MOTION FOR
RECONSIDERATION**

I, GREGORY SOUTH, declare as follows:

1. I served as the interim President of North Idaho College (“NIC”) while Dr. Swayne was on administrative leave. I have 30+ years of progressive responsibility and 17+ years of executive/senior administrative experience, including extensive experience working with Governing Boards. I have personal knowledge of the information contained in the declaration and if called as a witness in this matter, I could and would testify thereto under oath.

2. I have reviewed the transcript of Dr. Swayne’s testimony from the hearing on February 24, 2023.

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3. There are some discrepancies between Dr. Swayne's testimony and my personal experiences, outlined below.

4. Dr. Swayne testified to the following:

A: Strategic planning and planning to address the shortcomings and improve what was going on at the college. Those are all the things that we're engaged with building community relations.

Q: And were you working on a strategic plan prior to being placed on leave?

A: Correct.

Q: Okay. And what was part of that strategic plan?

A: The big part of the strategic plan was repairing and improving the relationships with the community and -- and primarily focus on enrollment and retention and recruiting the students.

Hearing Transcript, p. 49:4-16.

5. However, during the time that I was serving as interim President, there was no strategic plan in the development stages that I was ever made aware of.

6. Dr. Swayne further testified to the following:

Q: Okay. And based on the communications with the individuals from NIC, had they done research in regards to the cost of changing conferences?

A: Yes.

Q: okay. And what is your understanding of what the cost to change conferences would be?

A: Yeah, likely to be, as I said, 1 to \$2 million.

Q: Okay. So 1 to 2 million additional dollars?

A: Per year, yeah.

Hearing Transcript, p.63:5-14.

7. However, during the time that I was serving as interim President, no such cost evaluation had ever been completed. In fact, during Cabinet meetings, it was clear to me that no final calculations had been completed or circulated.

8. The reports and information that I have reviewed regarding the potential costs associated with changing athletic conferences (in the event that the decision to do so was made at

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a later time) does not support a conclusion that the hypothetical costs would amount to between \$1-2 million dollars of added costs to NIC.

9. At all times during my time as interim President, I sought to ensure that Dr. Swayne's professional reputation would be maintained. For example, I sought to foster an environment at NIC that was focused on doing what was best for NIC in order to maintain accreditation.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this document on this 17th day of March, 2023, in March 17, 2023, Idaho.

DocuSigned by:

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GREGORY SOUTH

CERTIFICATE OF SERVICE

On March 17 2023, I caused the foregoing document to be filed via the Court's iCourt CM/ECF system which will send same to all counsel of record in this matter.

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