

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Golden Gate Yacht Club	Plaintiff,
v.	
Societe Nautique de Geneve	Defendant,
Club Nautico Espanol de Vela,	
	Intervenor-Defendant.

Index No. 602446/07

**AFFIDAVIT OF
THOMAS F. EHMAN, JR.**

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN DIEGO)

THOMAS F. EHMAN, JR., being duly sworn, deposes and says:

1. I am an American citizen over the age of 18 and Head of External Affairs for Golden Gate Yacht Club's racing representative, BMW ORACLE Racing. I have been involved with every America's Cup event since 1980, ten in total counting this latest edition, and I have served in many roles, including Team Manager, Organizing Committee Executive, Challenger of Record Manager, Challenger Commission Chairman, and Class Rule Commission Co-Chairman.

2. I was Executive Director (COO) of the United States Yacht Racing Union (the United States of America's national governing body for the sport of sailing) from 1979 to 1984. I served in various capacities with the International Sailing Federation ("ISAF"), including as head of the American delegation and a member of the ISAF Council, from 1980 through 1998. Over the past three decades, I have served as a judge for many international yacht racing events, including the 1992 and 1996 Olympics.


3. Following the April 7, 2009 Order and Judgment, GGYC repeatedly expressed its willingness (including in letters dated May 20, 2009, May 23, 2009, June 19, 2009 and July 28, 2009) to sit down with SNG to discuss an alternative venue for the next America's Cup match. SNG refused each invitation.

4. Ras al-Khaimah was selected unilaterally by SNG without any consultation with GGYC; the first time GGYC was informed that Ras al-Khaimah was even under consideration was when it received a letter from SNG on August 6, 2009 announcing it as the venue. Based on my experience with the America's Cup spanning almost thirty years, I believe that there is an agreement between SNG (and/or its Team Alinghi or team owner) and the government of Ras al-Khaimah (and/or one of its related persons or entities). The terms of any agreement have not been disclosed to GGYC.



Thomas F. Ehman, Jr.

Sworn to before me this 1 day of Oct., 2009


Notary Public

