

ORIGINAL

DEPT. OF LANDS

2019 APR 15 PM 4: 24

BOISE, IDAHO

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Attorneys for Intervenor/Respondents,
Payette Lakes Cottage Sites Owners Association, Inc.
and Wagon Wheel Bay Dock Association, Inc.

BEFORE THE STATE BOARD OF LAND COMMISSIONERS

SHARLIE-GROUSE)	
NEIGHBORHOOD ASSOCIATION,)	AFFIDAVIT OF ANDREW
INC.,)	CONNOLLY IN SUPPORT OF
)	MOTION FOR SUMMARY
Petitioners,)	JUDGMENT
)	
vs.)	(Intervenor-Respondents, Payette
)	Lakes Cottage Sites Owners
IDAHO STATE BOARD OF LAND)	Association, Inc. and Wagon Wheel
COMMISSIONERS,)	Bay Dock Association, Inc.)
)	
Respondent,)	
)	
and)	
)	
PAYETTE LAKES COTTAGE SITES)	
OWNERS ASSOCIATION, INC., an)	
Idaho non-profit corporation, and)	
WAGON WHEEL BAY DOCK)	
ASSOCIATION, INC., an Idaho non-)	
profit corporation,)	
)	
Intervenor/Respondents.)	
)	

STATE OF IDAHO)
 : ss.
County of Ada)

ANDREW CONNOLLY, being first duly sworn upon oath, deposes and says as follows to-wit:

1. I am the President of Payette Lakes Cottage Sites Owners Association, Inc. (“PLCSOA”), and a member of Wagon Wheel Bay Dock Association, Inc. (“WWBDA”), Intervenor-Respondents in this matter.

2. I am familiar with the facts at issue in this action, and I make this Affidavit based upon my own personal knowledge.

3. My wife, Gina, and I, along with two other couples, own a cottage site situated within the boundaries of PLCSOA. We placed the winning bid at auction for the cottage site, which was previously owned and leased by the State of Idaho, on or about January 31, 2015. This cottage site includes the right of access to the roads and several lakeside common areas located within the boundaries of PLCSOA. These roads and common areas are owned and managed by PLCSOA for the benefit of its members and prior deeded owners.

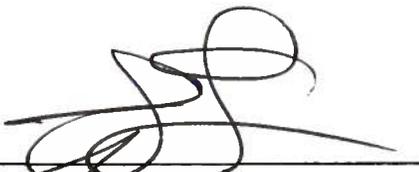
4. We purchased our cottage site in reliance of the fact that PLCSOA owned the roads and common areas, to which we would have access. We are one of dozens of purchasers of cottage sites previously owned by the State of Idaho and auctioned within the past few years.

5. As a second-tier cottage site owner (*i.e.* not lake front), this access to the lake is an incredibly valuable part of our property, and the primary reason that we purchased the property. A similar lot located elsewhere in McCall, without lake access, is much less valuable and we would not have been willing to pay as much for our cottage site without this access. On the other hand, we could not afford to buy a lakefront property with its own lake access.

6. As members of WWBDA, my wife and I have expended many thousands of dollars on the dock itself, as well as to pay attorney fees to defend against efforts by SGNA or its members to thwart WWBDA's efforts to install or maintain its dock.

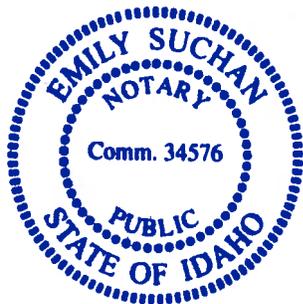
FURTHER, YOUR AFFIANT SAITH NAUGHT.

DATED this 15th day of April, 2019.



Andrew Connolly

SUBSCRIBED AND SWORN TO before me this 15 day of April, 2019.



Emily Suchan
Notary Public for Idaho
Residing at Boise, ID
Commission Expires: 08/25/2024

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2019, I caused to be served a true and correct copy of the foregoing, by the method indicated, and addressed to the following:

Angela Schaer Kaufmann [] U.S. Mail, postage prepaid
Joy M. Vega [] Hand Delivered
IDAHO DEPARTMENT OF LANDS [] Overnight Mail
P.O. Box 83720 [] Facsimile: (208) 854-8072
Boise, ID 83720 Email

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