

Affidavit of John Steele

JOHN STEELE, under penalty of perjury, says as follows:

1. I am over eighteen years of age and am competent to testify as to the matters set forth herein. I make this affidavit on the basis of my personal knowledge and if called to testify at trial I would testify as follows.
2. My legal residence is in Las Vegas, Nevada and I also spend 1-2 weeks a month in Miami, Florida.
3. I am a licensed attorney and member in good standing of the Illinois state bar.
4. I am currently assisting in an of counsel capacity in several Illinois cases for Prenda Law Inc. and have appeared *pro hac vice* in several cases across the country.
5. I have no ownership interest in Prenda Law Inc.
6. I have no involvement with case 8:12-cv-1685-T-35MAP. I have never appeared in a legal capacity in any Florida court and am not licensed as an attorney in Florida.
7. I have no fee splitting agreement or arrangement with Prenda Law regarding any cases in Florida, including 8:12-cv-1685-T-35MAP. I have received no fees from this case, and do not expect to receive any fees resulting from this case.
8. I opened a law firm devoted to Family Law matters named Steele Law in 2008. My wife assisted me from 2008-2011. Steele Law and its successor firm was and continues to be located at 161 N. Clark St., Chicago IL 60601. In 2011 I entered into an agreement to sell the firm to Mr. Peter Olson, with the sale closing on April 1, 2012. The name of the firm was changed at this time.
9. Neither I nor my wife has been involved in any substantive way with Steele Law since the sale of the law firm.
10. Some office space formerly used by Steele Law was rented out by the building's landlord to Prenda Law Inc. in 2011.
11. The computer my wife used at Steele Law, and other equipment that I no longer needed, was sold to Paul Duffy when he opened Prenda Law, Inc. in November 2011.
12. Paul Duffy is a good friend of mine that I have known since law school.
13. I have not been back to 161 N. Clark Street since 2011 except for 3 or 4 times to see Mr. Olson for lunch or to meet with Mr. Duffy about a case in Chicago we are working on together.
14. I know Graham Syfert mainly due to his filing two bar complaints with the Florida Bar regarding me. The complaints were downright bizarre, and the Florida Bar threw them out.
15. I am aware that Mr. Syfert has filed at least one bar complaint against at least three people associated with Prenda Law. All of Mr. Syfert's bar complaints have been immediately thrown out to the best of my knowledge.
16. To the best of my knowledge I have not spoken with Mr. Syfert. The reason for my lack of certainty is that I learned in Mr. Syfert's own filings that he has repeatedly used false names and email addresses to attempt communication with me and other attorneys associated with Prenda Law Inc.
17. Every allegation made by Mr. Syfert regarding me impersonating Mr. Duffy is false.
18. To the best of my recollection, I have not used any computers located at Prenda Law's office located at 161 N. Clark Street. Furthermore, I was not in Chicago during the week of November 18, 2012.
19. I am aware that a bar complaint was filed in 2012 against Mr. Syfert for harassing the employees of Prenda Law. The last document I read from the Florida Bar

stated that they had found probable cause to move forward against Mr. Syfert. I do not know if he was sanctioned for his behavior.

- 20. On November 27, 2012 I drove with Mark Lutz to Tampa to observe the hearing before this Court.
- 21. Upon arriving, I whispered to Mr. Lutz who was sitting in the courtroom, "Hey, I'm here", and proceeded to sit in the back of the courtroom to observe the proceeding.
- 22. To ensure complete candor with this Court, I have worked with Sunlust Pictures, and one of the managing members, on cases in states other than Florida. In any case I have represented Sunlust Pictures, I have filed my appearance, in accordance with the respective court's rules.

I declare under the penalty of perjury and upon personal knowledge that the foregoing is true and correct.

Dated: December 17, 2012
STATE OF NEVADA

COUNTY OF Clark
 This instrument was acknowledged before me on 12/17/12 (date) by
Steele, John (name(s) of person(s)).
Deborah Miner
 Notary Public Printed Name: D. Miner
 My Commission Expires: 2/19/16

