

AFFIDAVIT OF EUGENE J. DEAN, JR.

I, the undersigned Eugene J. Dean do hereby depose and state:

1. I am a principal of Dean & Flynn, Inc. ("D&F"), a company started by my father that is in the business of providing carnival-style amusement rides and concessions. D&F currently provides these services to the Topsfield Fair on an annual basis, which it has done every year since my father was awarded the Topsfield Fair contract in 1950.

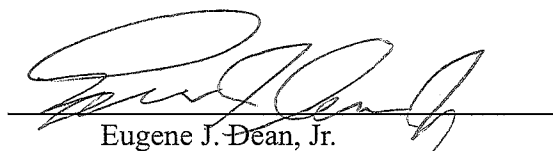
2. I was born in 1942. My earliest memory of the Topsfield Fair is camping on the fairgrounds in a tent with my father and a boyhood friend just before I entered the first grade, which was around Labor Day of 1947. At that time, my family lived in Salisbury, Massachusetts.

3. During a great many of the years since 1947 (although not every single year), I have camped at the Topsfield Fair for one or two nights. I continued to do this on a regular and frequent basis until approximately 20 years ago, at which point I stopped camping at the fairgrounds and would instead return to my Massachusetts residence in Newburyport/Salisbury each night after Fair festivities concluded. (I currently spend approximately seven winter/cold-weather months living in Florida, but I typically spend a good part of the summer and early fall in Newburyport, including the leadup to Columbus Day weekend when the Topsfield Fair runs.)

4. From 1947 until only recently, the Topsfield Fair was always crowded with people who were camping. Historically, many would camp in tents, and many would camp in RVs – even in the earliest days I can remember, RVs were quite popular.

5. Notably, the Topsfield Fairgrounds are equipped with water and electricity utilities that campers may use. I cannot pinpoint the exact date or year as to when those utilities were installed, but my memory is that they have been available for at least several decades, and quite possibly much longer than that. Regardless, camping has always been a central component of the Topsfield Fair for as long as I can remember, and as I understand it, for many years before I started camping on the fairgrounds with my father.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 15 DAY OF JUNE, 2023.


Eugene J. Dean, Jr.