

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

Application of The Japanese Educational Institute
of New York,

Petitioner.

For an order approving the sale of assets pursuant to
N-PCL §§ 510 and 511.

Index No. 06-103400

IAS Part 13
Hon. Sheila Abdus-Salaam

AFFIDAVIT

AFFIDAVIT OF HAMAKO KING

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

HAMAKO KING, being duly sworn, deposes and says:

1. I have been a member of the Japanese School of New York PTA (the “PTA”) since 2004. The Japanese Educational Institute of New York (“JEI”) is asking the Court to approve its sale of the campus in Greenwich, Connecticut which is the home for the JSNY. I am submitting this affidavit to support the PTA’s objections to the sale and to ask the Court to deny JEI’s Petition.

2. I am a witness to statements and events showing that the decision of the JEI Trustees to sell the campus to the Westchester Fairfield Hebrew Academy (WFHA) was not based on the educational or fiscal merits of the selling plan.

3. On October 25, 2005, I met for over three hours with Mr. Hiroshi Sato, Deputy Consul-General of Japan, New York Office. Mr. Sato is also a JEI Trustee. PTA parents wanted to meet with him to help us break through the communication barrier that

JEI officials had created between the parents and the Trustees. Four of us came to the meeting. Besides myself there was Mrs. Kajiwara, Mr. Jachmann and Mr. Adachi.

4. Of the 37 Trustees who were repeatedly asked to meet with JSNY parents, Mr. Sato was only the second Trustee to agree to meet with parents before the JEI Board of Trustees voted to sell the school. At the outset of our conversation Mr. Sato stated that he would abstain from the upcoming vote to sell the school.

5. During our conversation Mr. Sato said the following.

- He believed that there was no financial crisis at the school. He stated that the JEI had reserve funds that would last 6 to 8 years even at current levels of unusually low enrollment but because the Trustees were all businessmen who liked to make quick decisions and dispatch problems they wanted to dispose of the school quickly.
- He pointed out that the Trustees would soon vote to sell the school for two reasons: a) The Trustees were angry at the parents for questioning their authority; and b) the Trustees were afraid of a law suit from the buyer.
- Mr. Sato also said to us that JEI had done a bad job managing the school because in his opinion it was wrong for JEI to keep the decision to sell the school a secret from the parents.
- He said he thought that the JEI Board was not properly constituted and should include parents, teachers, and principals.

6. Finally, Mr. Sato also told us at the meeting that it was true that Sen. Joseph Lieberman had telephoned Mr. Sato's superior, Amb. Ando, Consul-General of Japan, regarding the sale of the Greenwich Campus to WFHA. Mr. Sato confirmed that after speaking to Sen. Lieberman on the telephone, Amb. Ando made a trip to Washington just to speak further with Sen. Lieberman in person about the Senator's concerns that the sale might be in jeopardy.

7. As a parent of two children at the JSNY I believe that JEI's Petition should be denied. The fiscal problems of the JSNY can be easily fixed by reducing the high JEI staffing levels and substituting parent volunteers and by renting parts of the campus - including some buildings to other schools who have repeatedly expressed interest in sharing the JSNY campus, including the British Schools of America, a local kindergarten, and a local extracurricular school. The campus chapel also has significant income potential for weddings – something that has been underutilized due to the lack of interest by JEI management.

HAMAKO KING

Sworn to before me this
27th day of March, 2006

Notary Public