

IN THE MONTGOMERY COUNTY, OHIO, COURT OF COMMON PLEAS
CIVIL DIVISION

LARRY C. JAMES, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Case No. 2017 CV 00839
	:	
v.	:	
	:	
DAVID HOFFMAN, <i>et al.</i> ,	:	Judge Timothy N. O'Connell
	:	
Defendants.	:	

**AFFIDAVIT OF
GREGORY J. MEYER**

and

Exhibit A

In Support Of

**PLAINTIFFS' CONSOLIDATED MEMORANDUM IN OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION
AND FORUM NON CONVENIENS**

IN THE MONTGOMERY COUNTY, OHIO, COURT OF COMMON PLEAS
CIVIL DIVISION

LARRY C. JAMES, et. al.,

Plaintiffs,

vs.

DAVID HOFFMAN, et. al.,

Defendants

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CASE NO: 2017 CV 00839

Judge Timothy N. O'Connell

AFFIDAVIT OF GREGORY J. MEYER

State of Ohio

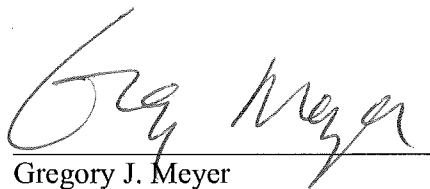
County of Lucas

)
) ss:
)

1. I, Gregory J. Meyer, having been first duly cautioned and sworn, state the following based upon personal knowledge:
2. I am a resident of and a licensed psychologist in Ohio, and a Professor in the Department of Psychology at the University of Toledo. I first read the Report titled "Independent Review Relating to APA Ethics Guidelines, National Security Interrogations and Torture" following receipt of a July 11, 2015 APA member email from Drs. Nadine Kaslow and Susan McDaniel notifying me that the Report was available at the APA website. I read the Report, in part, at my home and, in part, at my University office.
3. Two days later, on July 13, 2015, the Chair of the University of Toledo Department of Psychology circulated via mail a PDF version of the Report to all Department faculty and the elected representatives of the Department's graduate student body, encouraging them to read the Report, "as an important lesson in hubris." The Department Chair's email is attached. [Exhibit A]
4. The Report subsequently became the subject of discussions in the University's Department of Psychology. Among other things, faculty discussed how they should interact with students regarding the contents of the Report and how best to address any student concerns that might arise related to the Report.
5. I have worked professionally in the past with Dr. Stephen Behnke and was particularly aware that the Report cast Dr. Behnke in a highly negative light by characterizing his actions as

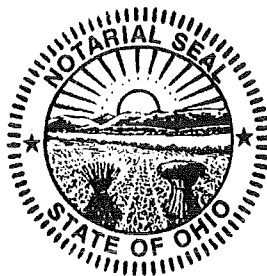
unethical. In fact, the Department Chair's email circulating the Report made it a point to say, "the head of the APA Ethics Office, Stephen Behnke, has been fired."

FURTHER AFFIANT SAYETH NOT.


Gregory J. Meyer

Sworn and subscribed to before a notary public in the State of Ohio, this 3rd day of

May 2017.



THERESA EDWARDS
NOTARY PUBLIC - OHIO
MY COMMISSION EXPIRES 08-22-2021

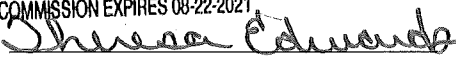

Notary Public

Exhibit A

Meyer, Gregory J

From: McSweeney, A. John
Sent: Monday, July 13, 2015 2:28 PM
To: Armus, Harvard; Brockmyer, Jeanne Helen; Bullock, Wesley A.; Caruso, Michael J.; Christman, Stephen D.; 'jonelhai@gmail.com'; Francis, Sarah; Geers, Andrew; Heffner, Henry E.; Heffner, Rickye S.; Jasper, John D.; Jones, Ann; Lee, Yueh-Ting; Levine, Jason C; London Newton, Kamala; McSweeney, A. John; Meyer, Gregory J; Mezo, Peter; Mihura, Joni Lynn; Rose, Jason P; Tiarniyu, Mojisola F.; 'sally7273@buckeye-express.com'
Cc: Voss, Raymond Paul - Student; Vogel, Erin A; Kiss, Andrea B - Student; Van Dusen, John Patrick - Student; Nabors, Sabrina; Reau, Marcia Jane
Subject: Siddley-Austin Report on the actions of APA with regard to psychologists involvement of APA
Attachments: Siddley-Austin report.pdf

Dear Colleagues,

If you have not yet read the report of the independent investigation of APA by the law firm of Siddley-Austin I encourage you to do so. It is an important lesson in hubris and the need to ask questions of our leaders, not only in the political arena but in our professional organizations as well. BTW, the head of the APA Ethics Office, Stephen Behnke, has been fired.

John

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Secretary (Ms. Reau): 419-530-2717
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