

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
JONI L. MIHURA
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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:
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CASE NO: 2017 CV 00839

Judge Timothy N. O'Connell

AFFIDAVIT OF JONI L. MIHURA

State of Ohio)
) ss:
County of Lucas)

1. I, Joni L. Mihura, having been first duly cautioned and sworn, state the following based upon personal knowledge:

2. I am a resident of and licensed psychologist in Ohio, and an Associate Professor of Psychology 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" after receiving a July 11, 2015, email from Drs. Nadine Kaslow and Susan McDaniel sent to the APA membership indicating the Report was available at the APA website. I accessed the Report from both my home and University office locations.

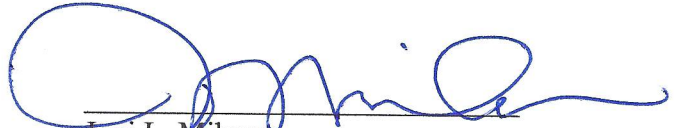
3. A couple of days after receiving the APA membership email with a link to the Report, I received an email (7/13/2015) from the Chair of my Department circulating a PDF version of the Report to all Department faculty and the students elected to represent the Department's graduate student body. The email encouraged us to read the Report and made specific mention of the Report being a "lesson in hubris" and the need to ask questions of our political and professional organization leaders. The Chair's email is attached. [Exhibit A]

4. After it was circulated to the Department, the Report was the subject of discussions by faculty and students in the Department. One of the things specifically discussed by faculty was how to interact with students regarding the contents of the Report. Also, we discussed how best to address any student concerns that might arise related to the Report.

5. Among other things, the Report casts Dr. Stephen Behnke, with whom I have consulted in the past, in a highly negative light by describing him as behaving unethically. This was further

called to my attention by my Department of Psychology Chair who, when circulating the Report, indicated that Dr. Behnke had been fired.

FURTHER AFFIANT SAYETH NOT.



Joni L. Mihura

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 08-28-2021

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; Tihamiyu, 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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