

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
WENDY PETERS**

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 WENDY PETERS

State of Ohio

)

) ss:

County of Montgomery)

1. I, Wendy Peters, having been first duly cautioned and sworn, state the following based upon personal knowledge:

2. I am a health and community psychology consultant and Post Doctoral Research Fellow at Wright State University Boonshoft School of Medicine in Dayton, Ohio. I am a resident of the State of Ohio. I first read the Report titled "Independent Review Relating to APA Ethics Guidelines, National Security Interrogations and Torture" on or about July 11, 2015. At the time the Report was made available, I was serving in American Psychological Association (APA) governance as a member of the Committee on Ethnic Minority Affairs. As a result, I received information on an APA governance listserv about the availability of the Report and accessed it on the APA website. I read the Report at my home and office in Dayton, Ohio.

3. The Report generated considerable discussion among my colleagues in the Ohio psychology community. Those discussions in which I participated noted in particular that the Report put Dr. Larry James, a Dayton psychologist, in a negative and unflattering light and noted the intense media coverage of the Report which was occurring. Discussions regarding how the Report characterized Dr. James extended beyond the psychology community to the professional and academic communities in light of Dr. James' position at the Wright State School of Professional Psychology.

FURTHER AFFIANT SAYETH NOT.



Wendy Peters

Sworn and subscribed to before a notary public in the State of Ohio, this 29th day
of April 2017.



JACKIE LATOUR
Notary Public, State of Ohio
My Comm. Expires June 29, 2021


Notary Public