

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
KATHERINE PLATONI**

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., : **CASE NO: 2017 CV 00839**
: **Plaintiffs,** : **Judge Timothy N. O’Connell**
: **vs.** :
: **DAVID HOFFMAN, et. al.,** :
: **Defendants** :
:

AFFIDAVIT OF KATHERINE PLATONI

State of Ohio)
) ss:
County of Greene)

1. I, Katherine T. Platoni, having been first duly cautioned and sworn, state the following based upon personal knowledge:

2. I am a retired Army clinical psychologist with 34 years of Active Duty Army and Army Reserve service, and a former Clinical Psychology Consultant for the U.S. Army Reserve. I am a resident of the state of Ohio; I am a licensed psychologist in Ohio and Virginia, and serve as a Colonel in the Ohio Military Reserve. I first read the Report titled “Independent Review Relating to APA Ethics Guidelines, National Security Interrogations and Torture” on or about 17 July 2015. I accessed the Report on the American Psychological Association (APA) website from my home in Beavercreek, Ohio.

3. I found the Report to be anything but an “independent” or objective review of the issues and events contained within it. The Executive Summary in particular was grossly inaccurate, sensationalized and with seemingly questionable motivation. As I was acquainted with Colonels (Retired) Larry James, Morgan Banks and Debra Dunivin due to their Army service, I took particular note of the damaging allegations made against them in the Report, allegations I believed to be false. Additionally, that the APA would readily accept such distorted findings and proceed to apologize for the actions of military psychologists that never occurred belied motivation that seemed more about face-saving than finding the truth.

4. As a result of the Report and the subsequent actions of the APA, I resigned my membership in the APA and did so publically by a “letter to the editor” in the

March/April 2016 issue of the *National Psychologist*, a psychology trade newspaper published here in Ohio.

FURTHER AFFIANT SAYETH NOT.


Katherine T. Platoni

Sworn and subscribed to before a notary public in the State of Ohio, this 27th day
of April 2017.


Notary Public



JOHN D. HUTCHINSON, Notary Public
In and for the State of Ohio
My Commission Expires March 2nd, 2018