

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division**

STEPHEN BEHNKE, <i>et. al.</i> ,	:	
	:	
Plaintiffs,	:	Case 2017 CA 005989 B
	:	
vs.	:	Judge Hiram E. Puig-Lugo
	:	
DAVID HOFFMAN, <i>et. al.</i> ,	:	
	:	
Defendants	:	
	:	

**DECLARATION OF WILLIAM STRICKLAND IN SUPPORT OF PLAINTIFFS’
MOTION FOR LIMITED DISCOVERY REQUESTS PURSUANT TO
DEFENDANTS’ ANTI-SLAPP AND ARBITRATION MOTIONS**

State of Virginia)
) ss:
County of Fairfax)

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

2. I was a member of the American Psychological Association Board of Directors (APA) from 2013-2015, during the time that Sidley Austin LLP was hired to conduct the Independent Review. I was a member of the Board during the time that the review was being conducted and the Report was published to the Board. The original purpose of the review was to carefully consider the allegations in James Risen's book, “Pay Any Price: Greed, Power and Endless War,” which alleges that APA colluded with the Bush administration, the CIA and the U.S. military to support torture during the war on terror and to ascertain the truth and factual accuracy of those allegations.

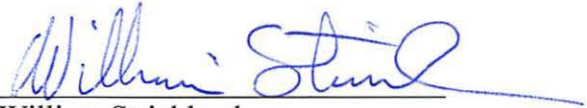
2. At the time of the Independent Review, there was no litigation pending or threatened or other legislative threats of action related to these allegations.

3. The Hoffman Report (HR) resulting from the Independent Review repeatedly indicates that staff members, including Ethics Office Director Dr. Stephen Behnke, behaved improperly in drafting documents, correspondence, and “talking points” for APA members serving on governance groups or elected to official APA positions. (See. e.g., HR pp.248-249). It is my understanding from my experience on the APA Board that not only is drafting documents and communications for governance members *not* improper, it is a routine and significant part of certain staff members’ job responsibilities, particularly

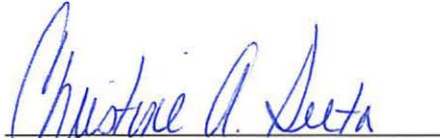
those staff members who serve as liaisons to boards, committee or task forces as did Dr. Behnke. In fact, during my time on the Board I personally witnessed numerous assignments be made by Board members or the Chief Executive Officer to staff to do just such drafting for governance members or groups.

4. Plaintiffs have not asked me to disclose any information I obtained which could be considered privileged or confidential. I was recused from much of the deliberations surrounding the Report, and all information contained in this affidavit is appropriately shared with the Court. I rotated off the Board of Directors at the end of 2015.

I declare under penalty of perjury that the foregoing is true and correct.


William Strickland

Sworn and subscribed to before a notary public in the State of Virginia, this 3
day of December 2018.


Notary Public

