

AFFIDAVIT

FROM: Barbara Lucks, P.O. Box 5719, Snowmass Village, CO 81615
RE: NAHA (National Association for Holistic Aromatherapy) 1999 Elections
DATE: January 12, 2004

My name is Barbara Lucks. During 1999 I was a member and Regional Director (Western Region) of the National Association of Holistic Aromatherapy (NAHA). This affidavit is a summary of my experience with that organization in the months preceding the election.

In the fall of 1998, I expressed concern about the financial sustainability of NAHA when published financial reports indicated a condition that was, in my opinion, leading the organization to bankruptcy. When I raised these issues at the Annual General Meeting in St. Louis in 1998, my concerns were discounted by the then-administration, headed by President Cheryl Hoard. Other directors and members expressed the same concerns both publicly and privately.

In the spring of 1999, I, along with many other NAHA directors, received a panicked call from Ms. Hoard indicating that the organization was in deep financial trouble and soliciting additional donations to keep the organization afloat. I requested a financial accounting from NAHA on a director's e-mail list, but none was forthcoming. Further, my requests were met with a hostile and defensive response from the administration. The requested accounting was never provided in spite of repeated requests for financial information. During this period, the Treasurer, Joan Goodman, resigned after expressing grave concerns about the Association's financial management.

When a solicitation went out for a new treasurer, I volunteered via an e-mail on the directors' list. The Directors' e-mail list and web site was maintained by Mary Martin, a member of the then-administration. My e-mail server indicated that my transmission was delayed by several days, and when my communication with the Association was restored, it was announced that Jade Shutes had been appointed treasurer. My continued requests for information continued to be met with hostile refusal by the Association.

The General Election was scheduled for the fall of 1999. I was nominated to run for President, and accepted the nomination. Jade Shutes was also nominated and accepted the nomination. During this period, the then-administration was openly promoting Jade Shutes as their preferred candidate to succeed Ms. Hoard. The atmosphere on the Directors' e-mail list was very confrontational with several members and directors repeatedly asking for accounting, and being answered by refusal and personal attacks from the administration.

In light of the hostile atmosphere, I contacted the Chair of the Ethics Committee, Dr. Christoph Streicher, requesting that the ballots for the election be sent to an independent accounting firm rather than the Association offices, which were located at the business address of Ms. Hoard. I believed independent receipt and verification of ballots was the only manner of assuring a fair election. Dr. Streicher indicated that he felt this was a reasonable request.

Several weeks later, I learned that Dr. Streicher had accepted a position on Jade Shutes slate of candidates as Treasurer of the Association. At no time during my communication

with Dr. Streicher did he disclose this conflict of interest. When the ballots arrived by mail to the membership, members were instructed to send them to Ms. Hoard's business address. Additionally, the Association allowed Jade Shutes to enclose a document marked "official ballot" in her campaign mailing to the membership at large. Mary Martin, NAHA's webmaster, developed and hosted a campaign website for Jade Shutes.

When I mailed my own ballot into the Association offices, I did so by certified mail. When I did not receive a return receipt, I called the Association office to ask if they had received my ballot. They indicated that it had been received, and also indicated that they believed I did not receive the return receipt because their local postal carrier (in their words) "did not bother with those things".

Upon my arrival in St. Louis in the fall of 1999 for the Annual General Meeting and Election, I discovered that all of the ballots had been opened prior to "certification" by the Association's elections judge. One election judge reported that when she entered the room to open and certify the ballots, they had already been opened and stacked. The official ballot count by NAHA declared Jade Shutes the winner of the 1999 NAHA election.

Barbara Lucks

State of Colorado)
) ss.
County of Pikin)

Subscribed and sworn before me this _____ day of January, 2004 by Barbara Lucks.

Notary Public

My commission expires: