

AFFIDAVIT

FROM: Mynou de Mey - 147 Little Neck Road, Centerport, New York

RE: NAHA (National Association for Holistic Aromatherapy)

DATE: January 25, 2004

My name is Mynou de Mey. I have been a member and volunteer for NAHA since 1994.

I have served as a volunteer in the following capacities:

Regional Director (1994-1999)

Member of the Education Committee (1994-2003)

Member of the Ethics Committee (1994-2003)

Co-Chair of the Education Committee (2003)

Conference Coordinator (2003)

Vice-President (2003)

I resigned from my position as Vice-President of Naha in June of 2003. During my work as Vice-President of Naha in 2003, and also prior to that date, I have witnessed the following breaches of NAHA bylaws, breaches of the State of Colorado Laws governing non-profit associations and other potentially illegal activity that gravely concerns me.

1. NAHA Staff Issues.

Supervision of the paid employee is solely conducted by Past President Jade Shutes (aka June Shutes). Shutes allows said employee (Teshan Laucerica) to chose her own hours, during which the phone for the association is rarely answered, if at all. The supervision of said employee is conducted at a bar or restaurant, according to Ms. Shutes, after business hours, and possibly at the cost of the membership. Said employee is also Shutes' best personal friend.

This paid employee also received monetary compensation that was not discussed with the Executive Board members, which is against the association's bylaws. When I requested information concerning these disbursements, there was no answer from Shutes. I have continued to request documentation pertaining to this monetary compensation since July 2003, without answer nor compliance to my valid requests.

During my tenure as Vice President, and upon my probing, I was also informed by Shutes that there was compensation to the paid employee in the form of several bonuses. I have requested documentation of these bonuses. To date, no explanation has been forthcoming. I am also

questioning whether this additional income has been reported to the IRS, and./or whether this Naha disbursement has been reported by Naha to the appropriate government agency.

Additional questionable spending occurred when Shutes invited paid employee on a trip to Japan. I have requested documentation pertaining to this expense, and believe these trips may have been paid by membership fees, as no answer about the origin of the trip funds has been forthcoming. My requests have been ignored to date.

2. Abuse of Power.

Jade Shutes abused her Presidential power on many separate occasions. One volunteer was dismissed for no other reason than that Shutes thought the volunteer had no right to speak with other Executive Board members when she was unable to contact President Shutes. When the Executive Board members (including myself) voiced our disagreement with the dismissal of the volunteer, President Shutes replied that she was exercising her Executive Power to dismiss this person from her volunteer duties, with threats of leaving the Board in a legal mess if we did not comply.

During the previous administration, Ms. Cheryl Hoard (the previous President) also illegally dismissed another volunteer, Ms. Marcia Elston, under similar circumstances, that have remained unexplained to date.

Ms. Shutes intensely disliked my probing into the membership welfare, and she took it upon herself to dismiss me from the Association, by falsely accusing me of violating bylaws. This dismissal - which was not submitted to the Board for discussion, nor approval, was rescinded less than 24 hours later.

She also dismissed me from my other duties, on the Ethics Committee and the Education Committee, releasing a libelous and public memo, concerning my dismissal, but not the fact that said dismissal was rescinded by her within 24 hours.

President Shutes resigned in August 2003, yet is still making key decisions on behalf of the association, with complete disregard for its bylaws. Additionally, Shutes admitted to using membership funds to promote herself and her business in the association's major publication. This represents thousands of dollars of membership and association funds.

Despite the fact that all positions at NAHA are filled by volunteers, President Shutes appropriated these funds without the knowledge or permission of the Executive Board members. This situation was hidden for a lengthy period of time.

President Shutes has forbidden any communication to be given to the Vice President of NAHA, Ms. Suzanne Catty. Vice President Catty is the only member of the current Executive Board who was elected by the membership, and not appointed by (the now resigned) President Shutes. To my knowledge there are several questions regarding Shutes' misappropriation of funds and receiving monetary compensations not formally authorized. None of the compensations, and/or bonuses matters were ever discussed with the Executive Board members.

Michelle Miller was appointed by Shutes to replace me in my position of Vice-President. Contrary to customary practice that candidates for positions on the Executive Board present their candidacy through a memorandum explaining their desire to serve, as well as providing proofs of past experience and expertise to lead the Association, this person was appointed without having to submit anything to the membership. It is interesting to note that Ms. Miller is/was also Ms. Shutes student. It is my belief that most positions on the Board are now occupied by personal friends, business acquaintances, and past and/or current students of Shutes, creating a conflict of interest.

3. Neglect of Fiduciary Duties.

President Shutes notoriously refused to attend meetings as set by the Executive Board, despite our attempts to accommodate her schedule. However, several times the Executive Board members became aware of President Shutes inability to attend meetings only when she did not show up.

During my short tenure as Vice-President, it was the Executive Board policy to discuss and agree to meeting times. Even though those meetings were confirmed, and reconfirmed, the Executive Board members (Suzanne Catty and myself) had to chase Ms. Shutes by telephoning the office, her cell phone, and her residence, in order to call her attention to the imminent meetings.... sometimes, she simply made herself unavailable, without notice.

Shutes did not appear to be knowledgeable in the protocol of meetings, and often the meeting unfolded in a disorganized way, without any knowledge of and total disregard for our bylaws, Robert Rules, and the State of Colorado laws governing the requirement of Minutes for a nonprofit organization.

As the Conference Coordinator, I requested the database for free advertisement in order to publicize our conference. I was told that this database was contained in a computer that belonged to the Association, but that had been gifted for parts to the boyfriend or ex-husband of the paid

employee, without retrieval of information, and without submitting this matter to the Board for approval. My requests to retrieve this gifted computer and/or the information it contained have remained to date unanswered, and ignored.

The State of Colorado regulating non-profit associations forbids loans of any kind.

One vendor at a Seattle conference (name withheld at the moment) was allowed to use a booth without paying any fee. This decision was made by Shutes because of her personal relationship with this vendor, and without the Board's knowledge. To my knowledge all other vendors at the conference were charged the full booth rental fee. Paid employee hid this fact from the Executive Board. To date, there has been no explanation and no indication that this loan has been repaid to the Association.

Other material belonging to Naha and the membership was loaned to individuals, without any effort to recuperate it, and leaving the task to others who had no knowledge of these dealings, i.e. the Advertising manuals containing important listings of potential advertisers, and representing a costly investment on the part of the membership.

I also asked what files were in the office, and was told that NO Naha files were kept at the office, but rather at Ms. Shutes residence, which is against our bylaws.

I was also informed that Ms. Shutes received all the Association's files from the previous administration, and that these files were kept in boxes that have not been opened to date. When I questioned how she was able to refer to past minutes and bylaws, she said she had consulted "old bylaws" that were obsolete.

When the membership requests Minutes of meetings, they are denied an answer, and/or compliance with their request, which is in breach of our bylaws and nonprofit protocol.

4. Filing of State and Federal Documentation.

Review of filed tax documents will illustrate that President Shutes always required an extension in order to file both state and federal documents. Membership publications, which are noted on Federal Tax Form 990s as a membership benefit, are not forthcoming, despite the fact that NAHA has access to all membership funds. Member requests for documentation is met with complete resistance.

5. The Association Publication

Upon paying a fee the membership receives quarterly journals. To date, after paying for a Professional membership, I have received only two (2) journals for 2003.

I have not received any refund for the portion unused, nor an explanation as to why. Others members have received only one journal for the year, and others none.

The journal published by our association is a vital part of the ongoing communication between the Association and its members. However, it is notoriously late in printing, or not printed at all, without explanation, nor reimbursement. Some people are sent the Journal, some others not. Ms. Shutes also resisted the advice by her Board to pass on the duties of the Journal editing to more qualified volunteers. Despite the fact that she admitted not being able to handle it, has refused to pass it on and has indicated that she wishes to remain in control of the journal and its contents. Thus, this lead to a vast self-serving advertising campaign on the part of Ms. Shutes.

Most Editors joining the volunteer group to work on the journal have always complained about the position, and have left the position, weary from the abuse inflicted by Ms. Shutes. The latest Editor-in-Chief, Emily Ray, was dismissed after making valuable and money-saving input, for the simple reason that Ms. Shutes disliked her personally, disregarding her efforts and the quality of her work. Shutes also refused to submit a budget for this journal to Emily Ray, upon her request, making her task rather impossible.

5. Changes of Bylaws

It came to my attention that some bylaws were changed illegally. Even though I do not possess many details regarding this matter, members have reported that those changes were done arbitrarily for self-serving reasons. I personally questioned one of the bylaws changed requiring that the Office remains permanently in Seattle, with the excuse that it would uproot the association if this was not done. However, when I requested minutes of this meeting to change this particular bylaw, I received no answer to date. During the prior administrations, the Naha Office was always in the same location as the serving President. I was also told that Ms. Shutes sought to keep the Naha office permanently in Seattle to insure that her friend, the Administrative employee would have a steady job and a steady income.

6. Conclusion

There has been extra-ordinary resistance to provide the membership with answers to their legitimate questions, and/or concerns. There has been gross neglect of fiduciary duties and there have been funds unaccounted for, questionable appropriation of funds, and other illegalities. All of it gravely concerns me, and the membership.

Respectfully submitted.

Mynou de Mey

State of New York)

) ss

County of _____)

Subscribed and sworn before me this _____ day of _____, 2004 by Mynou de Mey.

Notary Public

My commission expires _____