

AFFIDAVIT OF ARINA PITTMAN

I, Arina Pittman, swear or affirm that the following is true under penalty of perjury:

1. I am a resident of Santa Fe County.
2. I was the Managing Director of EcoVersity from September 2004 to about April of 2006, and its Executive Director until December 2006.
3. During my tenure at EcoVersity, the number of people served by its programs increased dramatically. In 2006, more than 100 people enrolled in EcoVersity's three ongoing certificate programs in Permaculture Design, Topbar Beekeeping, and Earth-Based Vocations. Approximately 600 people took at least one of EcoVersity's community classes, which were affordable, short-term, skill-oriented seminars, lecture series, and workshops. In fact, these numbers understate the extent of community involvement because many people, once introduced to our curriculum and offerings, decided to take additional courses. EcoVersity's public outreach programs included organizing and hosting Santa Fe Earth Day, which some 2,500 people attended in 2006, and the annual Green Build Tour, which drew 400 attendees. Children's Day at EcoVersity, which occurred every Thursday, served more than 300 children from across New Mexico, Arizona and Colorado in 2006. Lastly, I estimate that we gave personalized Sustainability Tours of the EcoVersity grounds to at least 600 members of the public annually. Lastly, EcoVersity regularly attracted a large number of volunteers from the community interested in maintaining its gardens, upgrading its grounds, and improving its ability to serve the community.
4. EcoVersity offered educational programs primarily during the warmer months of the year to take advantage of its outdoor campus and teaching setting.

5. Though most EcoVersity students were from New Mexico, many came from other parts of the United States, and even abroad. EcoVersity was fast becoming a prime New Mexico destination for people looking for ecological education and hands-on experience. In this sense, EcoVersity was supporting the City of Santa Fe's goal of becoming a nationwide leader in sustainability and it was contributing to the eco-friendly economic development of the region.

6 In October 2006, after a long time of trying to accommodate the misdirection, obstruction and interference of the principal board member of EcoVersity and its funder foundation Prajna, Thomas J. Harbour (also known as "R.P."), I asked EcoVersity's three board members to resign. Each EcoVersity board member had stated to me intent in resigning on numerous occasions, beginning with Mr. Harbour's statement to this effect as early as September 2004. I came to the conclusion that the board, led by Mr. Harbour, were standing as obstacles to the institution's growth and evolution and were impairing its mission of delivering educational programs to the broader community, and their continued service on the board posed an intractable problem.

7. After this conversation, in December 2006, EcoVersty's then-President George Clark asked me to resign. He asked me to sign a release of claims and a promise "not to disparage EcoVersity, its programs, or its board members." I refused. As a result, I did not receive any severance pay.

8. Upon my assuming my position at EcoVersity in 2004, I was told that George Clark, one of EcoVersity's three board members, would be paid the annual sum of \$10,000 to compensate him for professional services rendered to EcoVersity. I was told that Mr. Clark was being paid to be present on campus. He showed up at the EcoVersity offices at a time of his choosing on average once per week and spent

between one and one-half hours per visit on campus. He would spend this time meeting with me, and very seldom with other staff. Our meetings were casual and usually took place on a bench in the garden. Mr. Clark told EcoVersity staff that he would be establishing an office at EcoVersity with a computer, but this never happened. During Mr. Clark's visits to EcoVersity, he never did any office work at a computer or on the phone. He attended only one or two staff meetings, and only for part of these meetings, at that. His visits to me, though brief, were helpful because he served as a buffer between me and Mr. Harbour; however, they did not differ in content from what would be considered a normal board site visit for an organization of EcoVersity's scale. After six months or so of these visits, Mr. Clark's girlfriend gave birth to their baby and his visits quickly tapered off and then stopped altogether. I was shocked to learn later that he was paid \$48,000 from October 2004 to September 2005 for these visits, more than I or any staff member was paid.

98. Mr. Clark, a real estate developer, was interested in building a subdivision on EcoVersity's campus, with number of buildings varying from two dozen to over a hundred.

[REDACTED]

