

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

SARAH EDWARDS,)	
)	
PETITIONER,)	
)	
V.)	Case No. CV2012-903414
)	
GIRL SCOUTS OF NORTH-)	
CENTRAL ALABAMA, INC., an)	
Alabama non-profit corporation,)	
)	
RESPONDENT.)	

STATE OF ALABAMA)
COUNTY OF _____)

AFFIDAVIT OF PATRICIA COGHLAN

This affidavit is based on my personal knowledge.

1. My name is Patricia Coghlan, and I am over the age of 19, and I am the Chief Executive Officer of Girl Scouts of North Central Alabama, Inc. (“GSNCA”). The office of GSNCA is located at 105 Heatherbrooke Park Drive, Birmingham, Alabama, which is located in Shelby County, Alabama.

2. In 2007, a merger took place that combined all the Girl Scout Councils in North Central Alabama, resulting in the formation of the Girl Scouts of North Central Alabama, Inc.

3. GSNCA currently serves 36 counties in North Central Alabama.

4. The Mission and Vision of GSNCA is set forth in its Mission and Vision Statements attached hereto as Exhibit “1”.

5. In membership year 2011, GSNCA had 13,700 girl members, while in 2012, GSNCA had 15,081 girl members. See Exhibit “2”.

6. In membership year 2011, GSNCA had 5,003 adult members, and in 2012, GSNCA had 5,048 adult members. See Exhibit “2”.

7. GSNCA currently owns six (6) camping properties, Camp Cottaquilla, KPC, Camp Coleman, Camp Trico, Camp Anderel, and Camp Tombigbee.

8. GSNCA also owns the building that it is headquartered in, located at 105 Heatherbrooke Park Drive, Birmingham, Alabama, an office in Huntsville, Alabama, and a building in Anniston.

9. According to GSNCA records, in 2011, the total number of girl registrations for resident campers at the six (6) camps totaled 560. For membership year 2012, the total number was 472. In membership 2011, the total unduplicated number of girls attending camp was 462. In 2012, this number was 418.

10. In 2011, 3.4% of all GSNCA girls, based on unduplicated number of registrants for day camp, took advantage of our camping programs. In 2012, this number fell to 2.8%.

11. Based on my review of the GSNCA records, the six (6) camping properties lost a total of \$1,120,307.00 in 2010; \$925,113.00 in 2011; and \$868,779.00 in 2012.

12. At the time of the merger that resulted in GSNCA, the Board of Directors recognized that the six (6) camp locations were too many to serve the needs of GSNCA. The Board, as part of its long-term strategic plan, formed a Property Assessment Committee in the summer of 2011. In February 2012, the Property Assessment Committee made a presentation to the Property Committee. A copy of this report is attached hereto as Exhibit "3".

13. On March 27, 2012, the Property Committee reached its Assessment Conclusion, attached hereto as Exhibit "4".

14. The Property Committee formulated a Recommendation, which was presented to the Board of GSNCA on May 9, 2012. A copy of this Recommendation is reflected in the Board Minutes, which are attached hereto as Exhibit "5".

15. On May 9, 2012, the Board of Directors approved the implementation of the Property Plan. See Exhibit "5".

16. In reaching its conclusion, GSNCA received and reviewed information from its members, as well as non-members through a variety of forums. These included online questionnaires, town-hall meetings, email communications, virtual townhome meetings, and communications with a group that calls itself "Friends of Camp Coleman" (FOCC), of which Petitioner Edwards is the President. The Executive Committee met with the officers of Friends of Camp Coleman, including Petitioner, on August 13, 2012. When the Executive Committee requested a written proposal, it was refused because their lawyer instructed them not to put anything in writing. Copies of several pages of the FOCC website are attached hereto as Exhibit "6". Additionally, GSNCA regularly published Property Updates, all of which are similar to Exhibit "7" and "8". GSNCA, as part of its webpage, includes a "Property Update" section available for public viewing. A copy of the Property Update page is attached hereto as Exhibit "9".

17. At the present time, there are over 300 council sponsored program opportunities available for members. An example of these opportunities is set forth in the December 2012 – January 2013 Leader Connections, which is attached hereto as Exhibit "10".

18. Numerous documents have previously been provided to Petitioner and others working with her. A list of the date, individuals and documents provided is attached hereto as Exhibit "11". Many of these documents, such as the 990s, annual reports, audited financial statement and property updates are available to the public on the GSNCA website.

19. Attached hereto as Exhibit "12" is the draft 2012 Audit reflecting the assets of GSNCA.

20. The current Bylaws of GSNCA are attached hereto as Exhibit "13".

21. The appraised value of the six (6) camps and the Birmingham Office is set forth in Exhibit "14".

FURTHER, Affiant sayeth not.



PATRICIA COGHLAN

STATE OF ALABAMA)

COUNTY OF Shelby)

I, the undersigned, a Notary Public in and for said County and State, hereby certify that Patricia Coghlan, in her capacity as Chief Executive Officer of GSNCA, whose name is signed to the foregoing Affidavit and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, she voluntarily executed the same on the day the same bears date.

Given under my hand and seal this the 7 day of December, 2012.


NOTARY PUBLIC
My Commission Expires: March 15, 2014