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Petitioner in Propria Persona

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

ALISON MONAHAN,

Petitioner,

v.

PROFESSIONAL SKI INSTRUCTORS
OF AMERICA – WESTERN DIVISION,
a California nonprofit
mutual benefit corporation,

Respondent.

26CV012327
Case No. []

DECLARATION OF ALISON
MONAHAN
IN SUPPORT OF VERIFIED
PETITION
FOR ORDER COMPELLING
INSPECTION
OF CORPORATE RECORDS
(Cal. Corp. Code § 8336)

Related Case: Moore et al. v.
PSIA-AASI Western Division
et al., No. 26CV009976
(Hon. Julie G. Yap, Dept. 8D)

I, ALISON MONAHAN, declare:

I. IDENTIFICATION AND MEMBERSHIP

¶ 1. I am the Petitioner in this proceeding. I am over the age of 18. I reside in San Francisco, California. I make this declaration in support of my Verified Petition for Order Compelling Inspection of Corporate Records under California Corporations Code § 8336. The

facts stated in this declaration are within my personal knowledge. If called as a witness, I could and would competently testify to them.

¶ 2. I am an inactive member of the State Bar of California (Bar No. 261991; admitted January 9, 2009; inactive status effective February 3, 2014). I appear in propria persona in this proceeding. I do not represent any other member of Respondent in this proceeding and do not purport to assert any right on behalf of any other member.

¶ 3. I am, and at all times relevant to this Petition have been, a voting member in good standing of Respondent Professional Ski Instructors of America-Western Division (the "Corporation"). My PSIA-AASI Western Region member identification number is 424107. I have been a member of the Corporation since November 23, 2022. My current membership type is "Western Certified (Active)," and my current membership term is paid through June 30, 2027. At no time relevant to this Petition has my membership been suspended, terminated, placed on probation, or otherwise altered. A true and correct copy of my member-account page on the Corporation's member portal at members.thesnowpros.org/account/edit, captured by me on May 20, 2026, is attached as **Exhibit 17**.

¶ 4. During my membership, I have participated in PSIA-AASI member activities. I hold a Level 1 Alpine certification issued by the Corporation. I have exercised my voting rights as a member of the Corporation on matters submitted to its membership, including the bylaws-amendment vote held by the Corporation on December 19, 2023 and elections for the Corporation's Board of Directors. I have attended PSIA-sponsored events, including the 2026 Women's Summit sponsored by the PSIA-AASI Rocky Mountain Region. My interest in the matters described in this Declaration arises from my interests as a voting member of the Corporation.

II. EARLY 2026 — MEMBER DISCUSSION AND FY25 IMPACT REPORT REVIEW

¶ 5. By early 2026, based on my interactions with other members of the Corporation, questions about the magnitude of the Corporation's legal expenditures had become a recurring subject of discussion. The discussion arose in connection with the Corporation's disciplinary proceedings affecting current and former Board members and candidates for the 2026 Board election. In that context, in early April 2026, I reviewed the Corporation's FY25 Impact Report — a member-facing publication posted by the Corporation on its public website at psia-w.org/home/about/ under the "About" tab, opened by a signed letter from the Corporation's Chief

Executive Officer, Marisa Cooper, and closed by a signed letter from the Corporation's Board Chair. (A true and correct copy of the FY25 Impact Report is attached as **Exhibit 18** and authenticated in paragraph 28 below.) The FY25 Impact Report contains two related admissions about the Corporation's FY25 finances. The Financial Highlights section on page 03 states: "We did make the decision to draw funds from reserve this season to cover unplanned board expenses, ensuring we were able to cover the costs of operations and events." The Operational Finances notes section on page 04 states: "Given the harsh seasonal conditions, impact to resort business, state of the philanthropic sector, and cash flow impact of \$48,000 in unbudgeted board incurred expenses, we demonstrated a high degree of resilience." The same Operational Finances page contains a multi-year financial table showing that the Corporation's "Board of Directors Expenses" line increased from \$9,132.83 in FY24 to \$51,067.72 in FY25 — an increase of \$41,934.89 — while the "Legal" line increased only from \$450 in FY24 to \$3,795 in FY25. The apparent gap between the Corporation's own member-facing acknowledgment of approximately \$48,000 in unbudgeted board expenses funded by a draw from reserves and the \$3,795 outside legal fees figure reported on Part IX Line 11b of the Corporation's FY25 Form 990 (Exhibit 12, authenticated in paragraph 24 below) engaged my interest in the accuracy of the Corporation's sworn financial representations. My subsequent review of the Corporation's publicly posted Board and Finance Committee minutes from May 12 and August 11, 2025 (Exhibit 14, authenticated in paragraph 26 below) confirmed that outside legal services rendered by Holland & Hart were a substantial component of those board-incurred expenses: the May 12 Board minutes record approval of an "outstanding invoice for legal services rendered through Holland & Hart," and the August 11 Finance Committee minutes record that "[i]f not for H&H legal, we would not have had the overage."

III. APRIL 23, 2026 SPECIAL MEETING ROLE — DISCLOSED AND DISCLAIMED

¶ 6. I served as the Secretary of the April 23, 2026 special meeting of the members of the Corporation, a procedural role for that meeting under California Corporations Code § 7510(e). That role does not affect my standing as a member in this proceeding and does not bear on the records that are the subject of this Petition. I make this declaration solely in my capacity as a voting member of the Corporation.

IV. APRIL 24, 2026 TRO ORDER AND APRIL 25, 2026 BOD EMAIL

¶ 7. On April 24, 2026, I received a text message from a fellow Western Division member at approximately 3:53 PM Pacific Time advising me that the Sacramento Superior Court had denied the ex parte application for a temporary restraining order in *Moore et al. v. PSIA-AASI Western Division*, Sacramento Superior Court Case No. 26CV009976. I read the Court's minute order on April 24, 2026, the day it was issued. A true and correct copy of the minute order is attached as **Exhibit 8**.

¶ 8. On Saturday, April 25, 2026 at 2:16 PM Pacific Time, I received in my email inbox at alison.monahan@gmail.com — the email address on file with the Corporation as my member-of-record email — an email from memberservices@thesnowpros.org, with reply-to address memberservices@thesnowpros.org, signed "The PSIA-AASI Western Region Board of Directors." The subject line was "Sacramento Superior Court Denies TRO in Moore, et al. v. PSIA-AASI Western Division." The email was addressed "Dear PSIA-AASI Western Region Members," and I received it as part of the general member distribution. A true and correct copy of the email as received is attached as **Exhibit 9**.

¶ 9. After reading the April 25, 2026 email and comparing its representations to the text of the Court's minute order, I observed that the email contained characterizations of the Court's ruling and of the April 23 special meeting of members that did not appear in the Court's order. That observation prompted me to examine more closely the accuracy of other recent representations made by the Corporation to its members.

V. MAY 4, 2026 AUTOMATED OUT-OF-OFFICE REPLY

¶ 10. On Monday, May 4, 2026, at 8:00 AM Pacific Time, I sent an email from my email address (alison.monahan@gmail.com) to Marisa Cooper, the Corporation's Chief Executive Officer, at mcooper@thesnowpros.org, concerning a matter relating to the Corporation. Shortly after sending that email, I received an automated reply from mcooper@thesnowpros.org advising that Ms. Cooper was out of office and would return on Monday, May 11, 2026. A true and correct copy of the automated reply is attached as **Exhibit 7**. The automated reply confirms that the email address mcooper@thesnowpros.org was actively monitored and generated automated system responses to incoming messages as of May 4, 2026, and that Ms. Cooper was scheduled to return to office on May 11, 2026 — the business day before my May 12, 2026 email transmittal described below.

VI. APRIL 21 AND MAY 6, 2026 MEMBER INFORMATION SESSIONS

¶ 11. The Corporation hosted two member information sessions during the period relevant to this Petition: a session on April 21, 2026, and a session on May 6, 2026. The May 6, 2026 session was identified by the Corporation as a "Members Meeting: Special Session" in an email I received from Lynnea Anderson, the Corporation's Deputy Director, on May 1, 2026 at 7:00 PM, sent from landerson@thesnowpros.org with copy to westernBOD@psia-w.org and MemberServices@thesnowpros.org. I attended each session live via Zoom. At the start of each session, I observed a standard Zoom notice advising participants that the session was being recorded. I made my own audio recording of each session, having observed that notice, and prepared a contemporaneous transcript of each session from my recordings. To my knowledge, the Corporation has not publicly posted a recording of either session. A true and correct copy of my contemporaneous transcript of each session is attached collectively as **Exhibit 16**.

VII. SERVICE OF THE MAY 12, 2026 DEMAND

¶ 12. I personally prepared the May 12, 2026 written demand for inspection of corporate records under California Corporations Code § 8333 (the "May 12 Demand"). A true and correct copy of the May 12 Demand letter is attached as **Exhibit 1**.

¶ 13. On Tuesday, May 12, 2026 at 5:32 PM Pacific Time, I transmitted the May 12 Demand by electronic mail from my email address (alison.monahan@gmail.com) to the following recipients:

(a) **To: `westernBOD@psia-w.org`** (the Corporation's Western Board email distribution). This is the email address the Corporation itself directs its members to use for correspondence directed to the Board. By way of example, in the Corporation's May 1, 2026 email from Deputy Director Lynnea Anderson regarding the May 6, 2026 Members Meeting Special Session, the Corporation directed members: "If you have any questions you would like to submit, please send them to the Western Board of Directors westernBOD@psia-w.org, by noon Tuesday." The May 12 Demand was addressed in its body to Julie Brown, the Corporation's Secretary, c/o the Corporation.

(b) **Cc: `mcooper@thesnowpros.org`** (Marisa Cooper, Chief Executive Officer, at her official Corporation email address).

A true and correct copy of the email transmittal as sent, including the Gmail-generated header information, is attached as **Exhibit 2**.

¶ 14. I did not receive any bounce-back message, non-delivery notification, automated out-of-office reply, error report, or other system response with respect to the May 12, 2026 email transmittal to either westernBOD@psia-w.org or mcooper@thesnowpros.org.

¶ 15. On Wednesday, May 13, 2026, I deposited with the United States Postal Service a certified mail packet containing the May 12 Demand and supporting materials, addressed to the Corporation at its designated mailing address, P.O. Box 969, Truckee, California 96160. The packet was sent by Certified Mail, Return Receipt Requested, under USPS Tracking No. 7022 3330 0001 1346 4454. A true and correct copy of the USPS tracking record for the May 12 Demand, captured by me from tools.usps.com/tracking/70223330000113464454 on May 20, 2026 at approximately 5:48 PM Pacific Time, is attached as **Exhibit 3**. The tracking record reflects deposit, transit, and delivery of the certified mailing to the Corporation's mailing address; specifically, that USPS took possession of the item in Olympic Valley, California on May 13, 2026 at 10:46 AM; that the item arrived at the Truckee Post Office on May 15, 2026 at 9:35 AM and was at that time made "Available for Pickup" at 10050 Bridge Street, Truckee, California; and that USPS issued a "Reminder to Schedule Redelivery" on May 20, 2026 advising the addressee that the item would be returned to sender if not retrieved.

VIII. MAY 13, 2026 OFFICIAL BOARD UPDATE

¶ 16. On May 13, 2026, the Corporation published on its public website at psia-w.org a document titled "OFFICIAL BOARD UPDATE: FOCUSED ON STABILITY, PROFESSIONALISM, AND THE FUTURE," signed "The PSIA-AASI Western Region Board of Directors" (the "May 13 Board Update"), at the URL psia-w.org/official-board-update-focused-on-stability-professionalism-and-the-future/. I observed the May 13 Board Update on the Corporation's website on May 13, 2026, and captured a screenshot of the document as published at approximately 3:16 PM Pacific Time on that date. The Corporation did not transmit the May 13 Board Update to me by email. The Internet Archive Wayback Machine independently captured the May 13 Board Update at the Corporation's URL on May 13, 2026 at 22:52:29 UTC (3:52 PM Pacific Time), preserving the document as published, at web.archive.org/web/20260513225229/https://psia-w.org/official-board-update-focused-on-stability-professionalism-and-the-future/. Attached as **Exhibit 10** are true and correct copies of (a) the screenshot I captured of the May 13 Board Update as published on the Corporation's

website at approximately 3:16 PM Pacific Time on May 13, 2026; and (b) the Internet Archive Wayback Machine capture of the same document at the foregoing URL and timestamp.

IX. SERVICE OF THE MAY 13, 2026 SUPPLEMENTAL DEMAND

¶ 17. I personally prepared the May 13, 2026 supplemental written demand for inspection of corporate records under California Corporations Code § 8333 (the "May 13 Supplemental Demand"). The May 13 Supplemental Demand sought records bearing on specific factual representations made by the Corporation in the May 13, 2026 Official Board Update described in paragraph 16 above. A true and correct copy of the May 13 Supplemental Demand letter is attached as **Exhibit 4**.

¶ 18. On Wednesday, May 13, 2026 at 4:55 PM Pacific Time, I transmitted the May 13 Supplemental Demand by electronic mail from my email address (alison.monahan@gmail.com) to the same recipients identified in paragraph 13 above, in the same configuration:

(a) **To:** `westernBOD@psia-w.org`; and

(b) **Cc:** `mcooper@thesnowpros.org`.

The May 13 Supplemental Demand was addressed in its body to Julie Brown, Secretary. A true and correct copy of the email transmittal as sent, including the Gmail-generated header information, is attached as **Exhibit 5**.

¶ 19. I did not receive any bounce-back message, non-delivery notification, automated out-of-office reply, error report, or other system response with respect to the May 13, 2026 email transmittal to either westernBOD@psia-w.org or mcooper@thesnowpros.org.

¶ 20. On Thursday, May 14, 2026, I deposited with the United States Postal Service a certified mail packet containing the May 13 Supplemental Demand and supporting materials, addressed to the Corporation at P.O. Box 969, Truckee, California 96160. The packet was sent by Certified Mail, Return Receipt Requested, under USPS Tracking No. 9589 0710 5270 2362 6951 98. A true and correct copy of the USPS tracking record for the May 13 Supplemental Demand, captured by me from tools.usps.com/tracking/9589071052702362695198 on May 20, 2026 at approximately 5:47 PM Pacific Time, is attached as **Exhibit 6**. The tracking record reflects deposit, transit, and delivery of the certified mailing to the Corporation's mailing address; specifically, that USPS took possession of the item in Tahoe City, California on May 14, 2026 at 1:13 PM; and that the item was made "Available for Pickup" at the Truckee Post Office, 10050 Bridge Street, Truckee, California, on May 18, 2026 at 11:34 AM.

2 **X. USPS TRACKING REVIEW AS OF EXECUTION DATE**

3 ¶ 21. I last reviewed the USPS tracking records for both certified mailings at
4 tools.usps.com on May 21, 2026 at approximately 11:43 AM Pacific Time. As of that final
5 review:

6 (a) The May 12 Demand certified mailing (Tracking No. 7022 3330 0001 1346 4454) had
7 not been retrieved by the addressee, and the May 20, 2026 "Reminder to Schedule Redelivery"
8 notice remained the most recent tracking event.

9 (b) The May 13 Supplemental Demand certified mailing (Tracking No. 9589 0710 5270
10 2362 6951 98) had not been retrieved by the addressee, and remained in "Available for Pickup"
11 status at the Truckee Post Office.

12 **XI. CORPORATION'S NON-RESPONSE**

13 ¶ 22. As of the execution date of this declaration:

14 (a) I have not received any production of records from the Corporation in response to the
15 May 12 Demand or the May 13 Supplemental Demand;

16 (b) I have not received any acknowledgment of receipt of either demand from the
17 Corporation;

18 (c) I have not received any communication from the Corporation, in writing or otherwise,
19 articulating any objection to any category of records demanded;

20 (d) I have not received any request for clarification of either demand from the
21 Corporation; and

22 (e) I have not received any communication concerning either demand from any officer or
23 director of the Corporation, from any employee of the Corporation, from the Corporation's
24 outside legal counsel of record in *Moore et al. v. PSIA-AASI Western Division* (Hadsell Stormer
25 Renick & Dai LLP), or from any other person purporting to act on behalf of the Corporation.

26 **XII. AUTHENTICATION OF BACKGROUND DOCUMENTARY EXHIBITS**

27 ¶ 23. Attached as **Exhibit 11** are true and correct copies of the following documents, each
28 downloaded by me from the Corporation's public website at psia-w.org:

29 (a) the Corporation's Bylaws (PSIA-AASI Western Division Bylaws), including Article
30 XIV § 14.4 (member inspection rights) and § 14.1 (records location requirements), downloaded
31 on or about May 4, 2026; and

(b) the Corporation's Policy Governance Manual, including Policy 2.5 (Asset Protection), paragraph 13 (CEO authority to commit Corporation to expenditures), and Policy 3.5 (Board review and approval of Form 990), downloaded on or about April 28, 2026.

¶ 24. Attached as **Exhibit 12** is a true and correct copy of the Corporation's federal Form 990 information return for the fiscal year ending June 30, 2025 (the "FY25 Form 990"). I downloaded the FY25 Form 990 on May 20, 2026 from the Corporation's own public website at psia-w.org. The FY25 Form 990 is published by the Corporation on its "About" page at psia-w.org/home/about/ under the financial-information tab, where the Corporation makes its annual Form 990 filings available to its members and to the public via the Corporation's Google Drive at drive.google.com/drive/folders/18nGDTdmYWbQNPCelnEouQoB4Qt8Riu5I. The FY25 Form 990 bears the electronic signature of Marisa Cooper, the Corporation's Chief Executive Officer, dated November 12, 2025, and reports, among other items, on Schedule O Line 6 that the Corporation had 3,590 members in fiscal year 2025.

¶ 25. Attached as **Exhibit 13** is a true and correct copy of relevant excerpts from the 2024 Instructions for Form 990 (Catalog No. 11283J, dated January 8, 2025), including page 46 containing the instructions for Part IX (Statement of Functional Expenses) lines 11a through 11g, downloaded by me from the Internal Revenue Service website at irs.gov on May 20, 2026.

¶ 26. Attached as **Exhibit 14** are true and correct copies of the following corporate minutes, downloaded by me from the Corporation's publicly accessible meeting-minutes archive at psia-w.org on or about May 6, 2026: (a) Board of Directors meeting minutes for the meeting held May 12, 2025; and (b) Finance Committee meeting minutes for the meeting held August 11, 2025.

¶ 27. Attached as **Exhibit 15** is a true and correct copy of the Corporation's publicly posted document titled "Frequently Asked Questions: 2026 PSIA-AASI Western Region Board of Directors Election," authored by Marisa Cooper, Chief Executive Officer, originally posted on March 21, 2026 and last updated on May 14, 2026, downloaded by me from the Corporation's website at psia-w.org/frequently-asked-questions-2026-psia-aasi-western-region-board-of-directors-election/ on May 20, 2026.

¶ 28. Attached as **Exhibit 18** is a true and correct copy of the Corporation's FY25 PSIA-AASI Western Region Impact Report, downloaded by me from the Corporation's public website

2 at psia-w.org/home/about/ on May 16, 2026. The substantive content of the FY25 Impact Report
3 and Petitioner's review of it are described in paragraph 5 above.

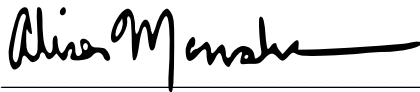
4 **XIII. DIRECT INTEREST AS A MEMBER**

5 ¶ 29. I have paid dues to the Corporation since November 2022 and am currently paid
6 through June 30, 2027. I have a direct interest, as a voting member of the Corporation, in the
7 Corporation's stewardship of the dues I have paid; in the accuracy of the representations the
8 Corporation makes to its members and to the Internal Revenue Service; and in the integrity of the
9 corporate processes that determine the composition of the Corporation's Board of Directors. I
10 rely on the Corporation's published representations — including those made in the Corporation's
11 published Frequently Asked Questions on the 2026 Board election, in the Corporation-hosted
12 member information sessions of April 21 and May 6, 2026, in the Corporation's email
13 communications to me as a member, and in the Corporation's Form 990 filings — in deciding
14 how to cast my vote on matters submitted to the membership.

15 **XIV. ATTESTATION**

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed on May 21, 2026, at San Francisco, California.

19 

20 _____
21 Alison Monahan, Petitioner