

EXHIBIT D

**IN THE MATTER
OF THE ARBITRATION OF**

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EIDO T. SHIMANO ROSHI and AIHO YASUKO SHIMANO,	:
Plaintiffs,	: 13-174-02595-13 01 SAIS-R
-against-	: <u>AFFIDAVIT OF VASKEN KALAYJIAN</u>
THE ZEN STUDIES SOCIETY, INC.	:
Defendant.	:
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I, VASKEN KALAYJIAN, hereby swear and depose the following under penalty of perjury:

1. I was a student at the Zen Studies Society (“ZSS”) from 1988 to 1993, and a member of the Board from 1992 to 1993.
2. On or about 1993 during my time as Board Member, two female students, from the ZSS’ temples—one of New York Zendo and one of Dai Bosatusu Monastery—reported to the Board that the abbot Eido Shimano had initiated unsolicited and unwanted sexual advances toward them. Eido Shimano confided to me that he had just ended an affair lasting 6 months with one of the female students. I asked him why does he have sex with his students and did he not know that in America it is not acceptable to have sex in cases of: Teacher-student, doctor-patient, and clergy-parishioner. He said he was aware of that, however it was a weakness he had.
3. One of the student’s reports was discussed at the Board level, including with her fiancé, who was then also a student of Eido Shimano at Dai Bosatsu Monastery.
4. The female student and her fiancé ended their studies at Dai Boastsu Monastery, and wrote a letter to the Board stating that he did not wish to bring a suit against Eido Shimano, but that he/they had incurred psychotherapy costs as a result of the sexual relations between Eido Shimano and the student.
5. Aiho Shimano—Eido Shimano’s wife, and then-Manager and bookkeeper of the New York Zendo—gave me a cashier’s check she obtained from the bank using the Society’s general funds for \$8,000 and instructed me to FedEx it to the female student and the fiancé which Eido Roshi had sex with. I was to include a note: “to pay for the psychotherapy.”
6. The ZSS’ then-lawyer Mr. Robert Greene instructed me on how to prepare a FedEx package that excluded the Society’s return address and not to have any mention of Eido Roshi,

and indicated he wanted the package prepared so as not to appear to come from the Society. He also instructed to Aiho Shimano to obtain the check from the bank as a cashier's check. Furthermore, Aiho Shimano, Eido Shimano and Wilkie Pretorius convinced the board that this money was to come from the ZSS' cash funds and a special account where Aiho Shimano deposited the cash donations received at door. I strongly objected to this and advised that Eido Shimano should pay for his own mistakes from his own pocket. However, I was ignored.

7. As ordered by Aiho Shimano and Robert Greene, I prepared the FedEx package and sent it to the attention of the student who Eido Shimano had sex with and her fiancé.

8. The fiancé cashed the check. Aiho Shimano retained a copy of the cashier's check. I retained photocopies of the check and the FedEx receipt for many years, until during a move in 2008 when I threw out all of the ZSS files including the Shimano documents.

Dated: New York, New York
February 3, 2011



Vasken Kalayjian