

COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT

CHURCH UNIVERSAL & TRIUMPHANT,)
INC., A MONTANA CORPORATION,)
)
 PLAINTIFF, CROSS-DEFENDANT)
 AND APPELLANT;)
)
 ELIZABETH CLARE PROPHET,)
)
 CROSS-DEFENDANT AND APPELLANT,)
)
 VS.)
)
 GREGORY MULL,)
)
 DEFENDANT, CROSS-COMPLAINANT)
 AND RESPONDENT.)
)

SUPERIOR COURT
NO. C 358191

APPEAL FROM THE SUPERIOR COURT OF LOS ANGELES COUNTY
HONORABLE ALFRED L. MARGOLIS, JUDGE PRESIDING
REPORTERS' TRANSCRIPT ON APPEAL

APPEARANCES:

FOR THE PLAINTIFF,
CROSS-DEFENDANTS AND
APPELLANTS:

RIORDAN & MC KINZIE
300 SOUTH GRAND AVENUE, SUITE 2900
LOS ANGELES, CALIFORNIA 90071
TELEPHONE: (213) 629-4824

FOR THE DEFENDANT,
CROSS-COMPLAINANT AND
RESPONDENT:

LAWRENCE LEVY, ESQ.
14724 VENTURA BOULEVARD, SUITE 704
SHERMAN OAKS, CALIFORNIA 91403
(818) 905-5971

-AND-

LYLE FRANCIS MIDDLETON, ESQ.
2500 WILSHIRE BOULEVARD, SUITE 810
LOS ANGELES, CALIFORNIA 90057
(213) 381-2277

COPY

VOLUME 11 OF 12 VOLUMES
PAGES 2293 TO 2597, INCL.

KATHLEEN H. ADAMS, CSR #2853
BRIDGET F. GEORGE, CSR #6148
CELESTE HALE, CSR #1310
ERMA DE MAR, CSR #2117
OFFICIAL REPORTERS

1 LOS ANGELES, CALIFORNIA; THURSDAY, MARCH 13, 1986 *

2 9:25 A.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 THE COURT: GOOD MORNING.

7 LET'S PROCEED.

8 MR. KLEIN: WE WOULD CALL DR. JOHN GORDON MELTON,
9 YOUR HONOR.

10
11 JOHN GORDON MELTON, +

12 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
13 TESTIFIES AS FOLLOWS:

14 THE CLERK: SIR, PLEASE STATE YOUR NAME FOR THE
15 RECORD AND PLEASE SPELL YOUR NAME.

16 THE WITNESS: JOHN GORDON MELTON. JOHN, J-O-H-N;
17 GORDON, G-O-R-D-O-N; MELTON, M-E-L-T-O-N.

18 THE CLERK: THANK YOU.

19
20 DIRECT EXAMINATION +

21 BY MR. KLEIN:

22 Q WOULD YOU PLEASE GIVE US YOUR EDUCATIONAL
23 BACKGROUND?

24 A I HAVE A BACHELOR'S DEGREE FROM BIRMINGHAM
25 SOUTHERN COLLEGE IN ALABAMA; A MASTER OF DIVINITY DEGREE
26 FROM GARRETT THEOLOGICAL SEMINARY, EVANSTON, ILLINOIS, WITH
27 A MAJOR IN CHURCH HISTORY AND MINOR IN METHODIST HISTORY;
28 AND I HAVE A PH.D. FROM NORTHWESTERN UNIVERSITY WITH A MAJOR

1 IN HISTORY AND LITERATURE OF RELIGIONS AND MINOR IN
2 INTELLECTUAL HISTORY.

3 Q COULD YOU TELL US YOUR PROFESSIONAL BACKGROUND,
4 PLEASE?

5 A I AM THE DIRECTOR OF THE INSTITUTE FOR THE
6 STUDY OF AMERICAN RELIGION, A POST I HAVE HELD FULL-TIME FOR
7 THE LAST FIVE YEARS. PRIOR TO THAT, I WAS PASTOR OF SEVERAL
8 METHODIST CHURCHES.

9 Q WHAT IS THE INSTITUTE FOR THE STUDY OF AMERICAN
10 RELIGION?

11 A THE INSTITUTE FOR THE STUDY OF AMERICAN
12 RELIGION IS AN INDEPENDENT RESEARCH FACILITY WHOSE PRIME
13 AREA OF RESEARCH ARE THE VARIOUS RELIGIOUS GROUPS OF
14 AMERICA, WHICH THERE ARE APPROXIMATELY 1,800 RIGHT NOW.

15 OUR PRIMARY TASK HAS BEEN TO BUILD A RESEARCH
16 LIBRARY THAT WOULD HOUSE MATERIAL FROM EACH OF THE VARIOUS
17 RELIGIOUS GROUPS OF AMERICA AS WELL AS A FILE ON THOSE AND
18 MAKE THEM AVAILABLE TO THE SCHOLARLY AND GENERAL PUBLIC.

19 Q DOES THE INSTITUTE FOR THE STUDY OF AMERICAN
20 RELIGION CURRENTLY RECEIVE FINANCIAL SUPPORT FROM ANY
21 INSTITUTION?

22 A YES. WE ARE CURRENTLY RECEIVING SUPPORT FROM
23 THE UNIVERSITY OF CALIFORNIA AT SANTA BARBARA. THE
24 FACILITIES OF THE INSTITUTE ARE CURRENTLY HOUSED ON CAMPUS
25 IN THE UNIVERSITY LIBRARY AND THEY ARE PROVIDING OFFICE
26 SPACE FOR MYSELF AS WELL.

27 Q AS DIRECTOR OF THE INSTITUTE, WHAT ARE YOUR
28 DUTIES, SIR?

1 A TO ADMINISTER THE AFFAIRS OF THE INSTITUTE, BUT
2 PRIMARILY MY TIME IS SPENT RESEARCH AND WRITING.

3 Q HAVE YOU PUBLISHED ANY BOOKS OR ARTICLES IN THE
4 AREA OF COMPARATIVE RELIGIONS?

5 A A NUMBER.

6 Q COULD YOU PLEASE TELL US SOME OF THE MORE
7 PROMINENT ONES?

8 A THE FIRST ONE WAS THE PUBLICATION MY
9 DISSERTATION, "THE SHAPE AND STRUCTURE OF THE AMERICAN
10 RELIGIOUS EXPERIENCE," WHICH WAS MY DOCTORAL RESEARCH ON
11 SURVEYING SOME 1,500 AMERICAN RELIGIONS.

12 OUT OF THAT GREW "THE ENCYCLOPEDIA OF AMERICAN
13 RELIGIONS," WHICH IS A TWO-VOLUME SURVEY OF ALL OF THE
14 RELIGIOUS GROUPS THAT WERE EXISTING IN THE LATE SEVENTIES IN
15 THE UNITED STATES WHICH HAS NOW BECOME A STANDARD REFERENCE
16 WORK IN THAT AREA.

17 I HAVE ALSO DONE TWO BOOKS ON WHAT ARE CALLED
18 CULTS, SOME NONCONVENTIONAL RELIGIONS. A BOOK CALLED "CULT
19 EXPERIENCE," WHICH IS WIDELY USED AS A TEXTBOOK IN COLLEGES,
20 AND A SECOND BOOK RECENTLY CAME OUT CALLED "WHY THE CULTS
21 SUCCEED WHERE THE CHURCH FAILS."

22 JUST THIS WEEK A VOLUME I HAVE BEEN WORKING ON
23 FOR THE LAST SEVERAL YEARS APPEARED CALLED "BIOGRAPHICAL
24 DICTIONARY OF CULTS AND SECTS." MOST OF THE BOOKS I WRITE
25 ARE REFERENCE VOLUMES. I HAVE ALSO DONE WRITING IN
26 METHODIST HISTORY AS WELL AND A NUMBER OF ARTICLES.

27 Q ARE YOU A MEMBER OF ANY ORGANIZATIONS INVOLVED
28 IN THE STUDY OF RELIGION?

1 A I AM A MEMBER OF THE AMERICAN ACADEMY -- THE
2 ACADEMY OF RELIGION AND FOR THE LAST TWO YEARS HAVE CHAIRED
3 SESSIONS ON NONCONVENTIONAL RELIGIONS THERE. I WILL ALSO
4 CHAIR A SESSION AT THE NEXT MEETING OF THE ACADEMY. I AM A
5 MEMBER OF THE SOCIETY FOR SCIENTIFIC STUDY OF RELIGION AND
6 AMERICAN SOCIETY OF CHURCH HISTORY.

7 Q ARE YOU AN ORDAINED MINISTER?

8 A I AM AN ORDAINED MINISTER IN THE UNITED
9 METHODIST CHURCH AND I AM CURRENTLY UNDER BISHOPS
10 APPOINTMENT. I AM CURRENTLY A MEMBER OF THE NORTHERN
11 ILLINOIS CONFERENCE.

12 Q HAVE YOU EVER BEEN CONSULTED BY THE UNITED
13 STATES ARMY IN THE AREA OF RELIGION?

14 A YES. I WAS HIRED BY THE ARMY TO HELP PREPARE A
15 CHAPLAIN'S MANUAL ON VARIOUS RELIGIOUS GROUPS THAT CHAPLAINS
16 ENCOUNTER WHEN THEY ARE IN THE ARMY, THAT THERE WERE TWO
17 EDITIONS OF THAT MANUAL THAT I PREPARED FOR THEM AND THAT IS
18 STILL BEING USED BY THE ARMY CHAPLAINS CORPS.

19 Q AND IN ADDITION TO YOUR EDUCATIONAL TRAINING
20 AND YOUR READING OF THE LITERATURE, HAVE YOU HAD OCCASION TO
21 GAIN KNOWLEDGE OF RELIGIOUS GROUPS BY YOUR OWN RESEARCH AND
22 OBSERVATION?

23 A YES. I CONSIDER THAT PART OF THE STRENGTH OF
24 MY WORK. FOR THE LAST 20 YEARS, I HAVE DEVOTED A GOOD DEAL,
25 ALMOST ALL OF MY RESEARCH TIME TO ACTUALLY GOING OUT AND
26 VISITING GROUPS, MEETING WITH THEIR LEADERS, PARTICIPATING
27 IN THEIR WORSHIP SERVICES, INTERVIEWING THEIR MEMBERS,
28 COLLECTING THEIR LITERATURE, COMPILING FILES ON THEM.

1 AND THESE FILES ARE NOW CURRENTLY HOUSED AT THE
2 UNIVERSITY OF CALIFORNIA.

3 Q WHAT IS THE PURPOSE OF DOING SUCH OBSERVATIONS?

4 A WELL, DURING THE LAST 20 YEARS PARTICULARLY,
5 BUT THROUGHOUT THIS CENTURY, IN AMERICA WE HAVE HAD A GREAT
6 PLURALIZATION OF RELIGION. WE NOW HAVE OVER 1,800 DIFFERENT
7 RELIGIOUS GROUPS FUNCTIONING IN AMERICA.

8 AND IT IS VERY HARD FOR ANY ONE PERSON TO GET
9 AHOLD OF THE DIFFERENT BELIEFS AND HOW THEY VARY. SOME OF
10 THEM USE QUITE DIFFERENT SYMBOLS, DIFFERENT LANGUAGES,
11 DIFFERENT WAYS OF UNDERSTANDING THE UNIVERSE.

12 AND TO HAVE A CLEARING HOUSE WHERE PEOPLE CAN
13 GO AND GET SOLID INFORMATION ABOUT DIFFERENT RELIGIOUS
14 GROUPS SEEMED VERY IMPORTANT IN GIVING THE NATURE OF THE
15 GROWTH OF DIFFERENT RELIGIONS IN THIS COUNTRY. IT'S BECOME
16 A VITAL PART OF OUR CULTURAL LIFE TO KNOW WHAT DIFFERENT
17 GROUPS, DIFFERENT COMMUNITIES BELIEVE.

18 Q IN WHAT GEOGRAPHICAL AREA HAVE YOU CONDUCTED
19 YOUR OBSERVATIONS?

20 A OVERWHELMINGLY MY RESEARCH HAS BEEN DONE WITHIN
21 THE CONTINENTAL UNITED STATES. BUT BECAUSE MANY OF THE
22 GROUPS THAT WE HAVE HERE COME FROM MANY OTHER COUNTRIES, I
23 HAVE HAD TO EXTEND. SO I HAVE HAD TO DO RESEARCH IN
24 ENGLAND, IN JAPAN, IN KOREA, BASICALLY VISITING THE
25 HEADQUARTERS OF GROUPS THAT HAVE MISSIONS IN THIS COUNTRY AS
26 WELL AS TOURING CANADA AND MEXICO AND JAMAICA.

27 Q DO YOU HAVE SOME CRITERIA TO DETERMINE WHETHER
28 A GROUP QUALIFIES AS A RELIGIOUS GROUP?

1 A THAT IS A BASIC QUESTION I HAD TO DEAL WITH IN
2 THE EARLY DAYS OF MY RESEARCH. YES, I DO.

3 Q WHAT IS YOUR CRITERIA?

4 A A RELIGIOUS GROUP WE DEFINE AS A GROUP THAT
5 DEALS WITH THE THREE BASIC RELIGIOUS QUESTIONS OF WHERE WE
6 AS HUMAN BEINGS COME FROM, HOW WE WERE CREATED, HOW WE
7 ORIGINATED, WHY ARE WE HERE, WHAT IS THE PURPOSE OF LIFE AND
8 WHAT IS OUR DESTINY. TO THAT -- THAT IS THE CONTENT OF
9 RELIGIOUS THOUGHT, THE BASIC CONTENT.

10 THEN TO BE A RELIGION, THERE MUST BE A GROUP
11 WHO IS SOLIDIFIED IF NOT AROUND AN AGREEMENT ON THE ANSWER
12 TO THOSE BASIC RELIGIOUS QUESTIONS, AT LEAST BY COMMON
13 SEARCH FOR THE ANSWERS AND A COMMON SET OF SYMBOLS THAT
14 REFLECT THAT SEARCH AND THEIR ANSWERS.

15 AND THEN WHO PROPOSE A LIFE STYLE BASED UPON
16 WHAT THEY HAVE FOUND OUT. THEY HAVE A WAY OF WORSHIPPING,
17 THEY HAVE A MORAL CODE, GENERALLY A WAY OF LIVING TOGETHER.

18 Q HOW MANY DIFFERENT RELIGIOUS GROUPS HAVE YOU
19 PERSONALLY OBSERVED DURING THE YEARS YOU'VE BEEN STUDYING
20 RELIGIONS?

21 A OF THE 1,800 GROUPS THAT I HAVE NOW LOCATED, I
22 HAVE PERSONALLY VISITED WELL OVER HALF OF THEM. I HAVE
23 CORRESPONDED WITH 95 PERCENT OF THEM. THERE ARE ABOUT 900
24 CHRISTIAN DENOMINATIONS, COMMON RUN-OF-THE-MILL CHURCH ON
25 THE CORNER TYPES OF GROUPS IN THIS COUNTRY. I VISITED A
26 WIDE VARIETY OF THOSE.

27 THERE ARE 3- OR 400 NEW AGE, OCCULT TYPE
28 GROUPS. I TRIED TO VISIT ALMOST ALL OF THOSE. THERE ARE

1 100 DIFFERENT HINDU GROUPS IN THE COUNTRY. I HAVE PROBABLY
2 VISITED A LITTLE OVER HALF OF THEM. MOST OF THEM ARE FAIRLY
3 SMALL AS YET AND STILL RATHER CONFINED TO ONE PART OF THE
4 COUNTRY SO I HAVEN'T VISITED QUITE THE NUMBER OF THEM.

5 AND THEN THERE ARE 70 OR 80 BUDDHIST GROUPS.
6 THERE ARE ABOUT 30 JEWISH GROUPS. I VISITED MOST OF THOSE.

7 Q DO YOU KNOW OF ANY OTHER PERSON IN THE UNITED
8 STATES CARRYING ON THE TYPE OF RESEARCH AND OBSERVATIONS
9 THAT YOU'VE DESCRIBED THAT YOU ARE DOING?

10 A YES AND NO. THERE ARE A FEW PEOPLE WHO HAVE
11 SOME VERY FOCUSED STUDIES IN ONE AREA. THEY ARE CARRYING ON
12 RESEARCH, SAY, ON ALL THE MORMON GROUPS.

13 BUT I AM THE ONLY PERSON CURRENTLY WHO IS
14 ATTEMPTING TO CARRY ON RESEARCH ACROSS THE BROAD AREA OF THE
15 WHOLE SCOPE OF AMERICAN RELIGION. THERE WERE THREE OTHER
16 PEOPLE WHO WERE DOING IT. BUT OF THOSE THREE, TWO ARE DEAD
17 AND ONE IS NOW RETIRED.

18 Q WHAT, IF ANY, KNOWLEDGE DO YOU HAVE ABOUT
19 CHURCH UNIVERSAL AND TRIUMPHANT?

20 A I HAVE DONE RESEARCH ON THEM SINCE I FIRST
21 ENCOUNTERED THEM IN THE EARLY SEVENTIES. MOST OF THAT
22 RESEARCH HAS BEEN RATHER INFORMAL AND AS THE OPPORTUNITY
23 AROSE. FOR EXAMPLE, WHEN I LIVED IN CHICAGO UP UNTIL A YEAR
24 AGO AND WHEN THEY WOULD PUT ON SPECIAL CONFERENCES IN
25 CHICAGO, I WOULD ATTEND.

26 I HAVE HAD THREE PERIODS OF VERY CONCENTRATED
27 RESEARCH ON THEM. THE FIRST WAS THE -- A PRIME TIME OF DATA
28 GATHERING IN THE MIDSEVENTIES WHEN I WAS PREPARING THE ITEM

1 ON THE SUMMIT LIGHTHOUSE, THE NAME BY WHICH THE CHURCH USED
2 TO BE KNOWN, FOR MY ENCYCLOPEDIA.

3 AT THAT POINT I GATHERED CONSIDERABLE AMOUNT OF
4 MATERIAL OF A LARGE PERCENTAGE OF THEIR PUBLICATIONS, AND I
5 READ THROUGH THEM AND I USED SOME MEMBERS OF THE CHURCH THAT
6 I INTERVIEWED TO HELP WRITE THAT ARTICLE.

7 THEN THE SECOND PERIOD OF CONCENTRATION CAME
8 WHEN I WAS INVOLVED IN A CASE IN MINNEAPOLIS IN A ZONING
9 CASE. ONE UNIT OF THE CHURCH IN MINNEAPOLIS WAS -- HAD TO
10 GO TO A ZONING HEARING, AND THEY ASKED ME TO COME IN AND TO
11 TALK ABOUT THAT CENTER BEFORE THE ZONING BOARD. AND IT WAS
12 ACTUALLY A COURT SITUATION. SO I WENT TO MINNEAPOLIS AND I
13 DID MUCH RESEARCH AND PREPARATION FOR THAT.

14 THE THIRD IS IN PREPARATION FOR THIS CASE, I
15 WAS AGAIN ASKED TO UPDATE MY KNOWLEDGE OF THE CHURCH. AS IT
16 HAPPENED, THAT CAME CONCURRENTLY WITH THE FACT THAT I HAVE
17 HAD TO WRITE TWO ARTICLES ABOUT THE CHURCH, BOTH OF WHICH
18 ARE IN PRESS.

19 Q DURING THE COURSE OF YOUR STUDIES OF CHURCH
20 UNIVERSAL AND TRIUMPHANT, HAVE YOU EVER ATTENDED ANY DECREE
21 SERVICES?

22 A QUITE A NUMBER.

23 Q HAVE YOU EVER INTERVIEWED MEMBERS OF THE GROUP?

24 A I HAVE INTERVIEWED OVER THE YEARS IN SOME DEPTH
25 15 OR 20 MEMBERS OF THE CHURCH, MORE LIGHTLY QUITE A NUMBER
26 OF MEMBERS.

27 Q HAVE YOU EVER INTERVIEWED ANY EX-MEMBERS OF THE
28 CHURCH?

1 A A HANDFUL. ACTUALLY MOST OF THE EX-MEMBERS I
2 ENCOUNTERED WERE THEN MEMBERS OF OTHER GROUPS AND I
3 ENCOUNTERED THEM IN THE PROCESS OF INTERVIEWING MEMBERS OF
4 OTHER GROUPS THAT I WAS SURVEYING.

5 Q WHAT, IF ANY, DOCUMENTS HAVE YOU READ
6 PERTAINING TO THIS PARTICULAR TRIAL HERE?

7 A I HAVE READ MR. MULL'S DEPOSITION, SEVERAL
8 DEPOSITIONS BY MR. KING, SOME OF THE TRIAL TESTIMONY, DR.
9 SINGER, RABBI ROBBINS, MR. MULL'S TESTIMONY, MR. KING'S
10 TESTIMONY. I HAVE READ A NUMBER OF THE EXHIBITS,
11 PARTICULARLY SET OF LETTERS WRITTEN BY MR. MULL.

12 AND IN THE COURSE OF THIS, OUR INSTITUTE HAS
13 NOW ATTAINED ALMOST A COMPLETE SET OF THE PUBLICATIONS OF
14 THE CHURCH, WHICH FILL UP TWO OR THREE SHELVES. AND I HAVE
15 A HALF A FILE DRAWER FULL OF CLIPPINGS, NEWSPAPER CLIPPINGS
16 ABOUT THE CHURCH.

17 Q NOW, YOU HAVE TESTIFIED YOU'VE BEEN TO DECREE
18 SERVICES. WE HAVE HEARD TESTIMONY IN THIS TRIAL THAT
19 DECREERING IS DONE IN A VERY FAST, VERY REPETITIVE MANNER.

20 IS THE NOTION OF PRAYING IN A VERY FAST, VERY
21 REPETITIVE MANNER UNIQUE TO CHURCH UNIVERSAL AND TRIUMPHANT?

22 A NO.

23 Q WOULD YOU EXPLAIN?

24 A THE FIRST TIME I ENCOUNTERED ANYTHING LIKE THIS
25 WAS ACTUALLY IN A SHIN BUDDHIST SERVICE. SHIN BUDDHISM IS
26 THE MOST POPULAR FORM OF BUDDHISM. IT WOULD BE TO JAPAN
27 WHAT METHODISM OR BAPTIST CHURCH IS TO AMERICA.

28 I CAN REMEMBER IN THE MIDSEVENTIES ATTENDING A

1 SERVICE AT A CHURCH IN CHICAGO IN WHICH VERY FAST TYPE OF
2 REPETITIVE MANTRA SAYING WAS BEING DONE.

3 Q WHAT KIND OF SERVICE WAS THAT?

4 A SHIN BUDDHIST.

5 THE NEXT PLACE I ENCOUNTERED IT WAS IN A SIKH
6 SERVICE. SIKHISM IS ONE OF THE VARIETIES OF INDIAN RELIGION
7 THAT IS VERY POPULAR IN THE PUNJAB AND THE KASHMIR.

8 IN THAT PARTICULAR SETTING, IT WAS COMBINED
9 WITH REGULATED BREATHING. THAT IS AS YOU WERE SAYING THE
10 MANTRAS, YOU WERE REGULATING YOUR BREATHING SO IT BECAME
11 MUCH MORE INTENSE THAN THE WAY IT IS DONE AT SUMMIT
12 UNIVERSITY OR THE WAY IT IS DONE AT CHURCH MEETINGS.

13 I HAVE ALSO ENCOUNTERED IT QUITE A BIT IN HINDU
14 SETTINGS.

15 Q WITH RESPECT TO THESE OTHER CHURCHES WHERE YOU
16 HAVE ENCOUNTERED SIMILAR REPETITIVE, VERY FAST TYPE OF A
17 PRAYING, ARE THE LENGTH OF THEIR SERVICES COMPARABLE TO THE
18 LENGTH OF THE DECREEING SERVICES YOU'VE BEEN TO?

19 A CHURCH SERVICES I HAVE ATTENDED HAVE LASTED UP
20 TO FOUR HOURS. AND BY CHURCH SERVICE, I MEAN DIFFERENT
21 CHURCHES, HOLINESS, PENTECOSTAL CHURCHES. THE SERVICES THAT
22 I ATTENDED WHERE THIS FAST REPETITION OF MANTRAS OCCURRED,
23 USUALLY THE SERVICES WERE A COUPLE OF HOURS LONG.

24 Q WE HAVE HEARD TESTIMONY THAT CHURCH UNIVERSAL
25 HAS RULES WITH RESPECT TO DIET, THAT PRIMARILY IT IS A
26 VEGETARIAN DIET.

27 IN YOUR STUDIES OF RELIGIOUS GROUPS, IS A
28 VEGETARIAN DIET IN ANY WAY UNUSUAL?

1 A VEGETARIANISM IS SOMETHING THAT HAS BEEN
2 POPULAR IN EVERY MAJOR RELIGIOUS TRADITION IN THE WORLD,
3 LESS SO IN WESTERN TRADITIONS THAN IN THE EASTERN
4 TRADITIONS.

5 IN THE EASTERN TRADITIONS IN BUDDHISM AND
6 HINDUISM, IT IS A MAJOR FEATURE OF VARIOUS GROUPS WHO WOULD
7 BE CALLED HINDU AND BUDDHIST. BUT IT IS -- AND IN THE
8 UNITED STATES DURING THE LAST 20 YEARS, IT HAS GROWN IN
9 POPULARITY BOTH AMONG CHURCH PEOPLE AND NONCHURCH PEOPLE.

10 WE KNOW OF SOME OF THE EASTERN GROUPS THAT ARE
11 RECRUITING IN THIS COUNTRY THAT HAVE PRIMARILY RECRUITED
12 AMONG PEOPLE WHO ARE ALREADY VEGETARIANS BECAUSE THEY ARE IN
13 FACT VEGETARIANS.

14 Q WE HAVE ALSO HEARD TESTIMONY THAT CHURCH
15 MEMBERS FAST.

16 THROUGH YOUR OBSERVATIONS OF CHURCH UNIVERSAL
17 AND TRIUMPHANT AND YOUR READINGS OF THEIR LITERATURE, HAVE
18 YOU ENCOUNTERED ANYTHING CONCERNING -- CONCERNING THE FACT
19 THAT THEY FAST?

20 A WELL, THE FACT THAT THE CHURCH FASTS JUST MAKES
21 THEM ONE OF A HUGE NUMBER OF RELIGIOUS GROUPS THAT ALSO
22 FAST, EVEN CONSERVATIVE PROTESTANT GROUPS.

23 AS A CHILD I WAS BROUGHT UP IN THE METHODIST
24 CHURCH IN ALABAMA AND FASTING WAS SOMETHING OUR PASTOR
25 TALKED ABOUT. IT IS QUITE A COMMON FEATURE OF CHURCH LIFE.
26 THE PECULIARITIES THAT YOU FIND IN THE CHURCH UNIVERSAL AND
27 TRIUMPHANT ABOUT FASTING ARE THE OPTIONS THAT THEY OFFER.

28 AMONG PEOPLE WHO ARE MOST LOOSELY AFFILIATED

1 WITH THE CHURCH, FASTING IS SORT OF RECOMMENDED, NICE THING
2 TO DO, THE MASTERS TALK ABOUT IT. WHEN YOU GET TO A CHURCH
3 CENTER OR IF YOU GO TO CAMELOT TO SPEND SOME TIME THERE, IT
4 IS A REGULATION THAT YOU HAVE THAT YOU DO SOME FASTING ONE
5 DAY A WEEK OR SOMETIMES THREE DAYS A WEEK, DEPENDING UPON
6 WHAT YOUR RELATIONSHIP IS TO THE CHURCH.

7 MOST PLACES YOU EITHER FAST OR YOU DON'T FAST.
8 YOU ARE EITHER IN OR YOU ARE OUT. WITH THE CHURCH, THEY
9 HAVE OPTIONS. YOU CAN DO A WATER FAST, YOU CAN DO A JUICE
10 FAST, YOU CAN DO A JUICE AND FRUIT FAST, OR IF FOR SOME
11 REASON YOU ARE UNABLE TO DO THAT, YOU CAN OPT OUT OF IT
12 ALTOGETHER.

13 Q WE HAVE HEARD TESTIMONY THAT THE CHURCH MEMBERS
14 BELIEVE IN REINCARNATION.

15 IS THAT UNUSUAL IN YOUR EXPERIENCE?

16 A IT WOULD HAVE BEEN 20 YEARS AGO. TODAY
17 REINCARNATION IS A VERY POPULAR THOUGHT. ACCORDING TO THE
18 GALLUP POLL TAKEN A FEW YEARS AGO, 20 PERCENT OF THE
19 AMERICAN PEOPLE NOW BELIEVE IN REINCARNATION AND KARMA. IN
20 CALIFORNIA 30 PERCENT OF THE PEOPLE IN CALIFORNIA BELIEVE IN
21 IT. IT IS A VERY STARTLING REVELATION WHEN THAT CAME ABOUT.

22 WE LEARNED THAT THE HIGHEST PERCENTAGE, THE
23 COMMUNITY THAT HAS THE HIGHEST BELIEF ARE SOUTHERN BLACKS,
24 BLACK PEOPLE IN CALIFORNIA OR BLACK PEOPLE IN THE SOUTH.
25 ALMOST 35 PERCENT OF THEM BELIEVE IN REINCARNATION.

26 Q WHAT ABOUT MAINSTREAM RELIGIONS? DO THEY, AS
27 FAR AS YOUR OBSERVATIONS AND KNOWLEDGE ARE CONCERNED, DO
28 THEY HAVE ANY BELIEFS IN REINCARNATION?

1 A CERTAINLY. AND THE GROWTH OF BELIEF IN
2 REINCARNATION IN THIS COUNTRY IS RELATED TO THE FACT THAT
3 HINDUISM AND BUDDHISM HAVE GROWN TREMENDOUSLY IN THIS
4 COUNTRY BECAUSE REINCARNATION IS A VITAL PART OF BOTH OF
5 THESE RELIGIONS.

6 AND AS EASTERN RELIGION BEGAN TO PROCEED IN THE
7 1890'S, ALONG CAME WITH IT A BELIEF IN REINCARNATION. AS
8 YOGA, HATHA YOGA, THE EXERCISE GROUP ALONG WITH HATHA YOGA,
9 A LOT OF THE TEACHERS PUT OUT A LITTLE INDIAN PHILOSOPHY.
10 AND SO THAT PARTICULAR -- ONE PARTICULAR BELIEF HAS GROWN
11 EVEN AMONG PEOPLE WHO ARE OTHERWISE NOT ATTUNED TO HINDUISM.

12 Q WE HAVE ALSO HAD TESTIMONY THAT CERTAIN CHURCH
13 MEMBERS KNOW WHO THEY WERE IN PAST HISTORY.

14 IS THAT UNUSUAL IN YOUR STUDY OF RELIGIONS?

15 A NOT REALLY. THAT'S BEEN ONE OF THE MAJOR
16 THINGS OVER THE CENTURIES THAT HAVE SOLD THE IDEA OF
17 REINCARNATION. AMONG HINDUS IT IS QUITE COMMON.

18 FELLOW NAMED IAN STEVENSON, WHO IS ON THE
19 FACULTY AT THE UNIVERSITY OF VIRGINIA, HAS DONE A RATHER
20 EXTENSIVE STUDY OF PAST LIFE MEMORIES, AS IT IS CALLED, AND
21 OVERWHELMINGLY THEY CAME FROM SOUTHERN ASIA WHERE HINDUS
22 PROFESSED TO KNOW WHO THEY WERE IN AN IMMEDIATE PAST LIFE.
23 OTHERS HAD SOME IDEA OF WHO THEY WERE IN MANY LIFETIMES AGO.

24 Q WE HAVE HEARD TESTIMONY THAT ELIZABETH CLARE
25 PROPHET IS BELIEVED TO BE THE MESSENGER.

26 IS IT UNUSUAL TO HAVE A PERSON CONSIDERED TO BE
27 THE MESSENGER IN ANY RELIGIOUS GROUPS?

28 A WELL OVER HALF OF THE RELIGIOUS GROUPS

1 CURRENTLY FUNCTIONING IN THIS COUNTRY WERE FOUNDED BY
2 SOMEONE WHO CLAIMS TO HAVE A SPECIAL RELATIONSHIP TO THE
3 DIVINE, TO GOD.

4 IT GOES BACK TO MOSES AND JUDAISM. MOSES
5 TALKED WITH GOD. JESUS WAS BELIEVED TO BE THE INCARNATION
6 OF GOD. MUHAMMAD TALKED TO ANGELS AND RECEIVED THE KORAN
7 FROM THEM. RIGHT ON DOWN TO CONTEMPORARY TIMES, PEOPLE LIKE
8 MARY BAKER EDDY AND JOSEPH SMITH.

9 THAT IS GENERALLY THE CHARACTERISTIC OF THE
10 FIRST GENERATION OF A GROUP. GROUPS TEND TO BE FOUNDED BY
11 SOMEONE WHO HAS SOME FORM OF CHARISMATIC LEADERSHIP WHO
12 EITHER CLAIMS DIRECT COMMUNION WITH GOD OR DIRECT COMMUNION
13 WITH SPIRITS. LATER GENERATIONS OF THE GROUP TEND TO DRAW
14 UPON THE MATERIAL THAT FIRST GENERATION MESSENGER PROPHET
15 BROUGHT.

16 Q WE HAVE HEARD TESTIMONY BY CHURCH MEMBERS THAT
17 THEY PRAY AGAINST A PERSON'S ENERGY, BUT NOT AGAINST THE
18 PERSON.

19 IS THAT CONCEPT CONSISTENT WITH INFORMATION
20 THAT YOU LEARNED WHEN YOU STUDIED THE GROUP?

21 A RIGHT. DECREERING IS FOR THE GROUP A FORM OF
22 PRAYER. AND WITHIN THE GROUP, EVERY PERSON IS CONCEIVED TO
23 BE A SPARK OF GOD. EVERY PERSON HAS WHAT IS CALLED AN I AM
24 PRESENCE. SO TO DIRECTLY PRAY AGAINST A PERSON WOULD BE
25 SELF-CONTRADICTION BECAUSE YOU WOULD BE PRAYING AGAINST GOD.

26 IN OTHER WORDS, I AM PARTIALLY, IN THEIR
27 CATEGORIZATION, I AM PARTIALLY DIVINE. SO YOU WOULD NOT
28 PRAY -- THEY WOULD NOT PRAY AGAINST ME BECAUSE THAT WOULD BE

1 PRAYING AGAINST THE DEITY.

2 BUT AROUND EVERY PERSON, THERE ARE ENERGY, EVIL
3 ENERGIES. ONE OF THEIR DAILY PRACTICES, IF I WERE A MEMBER
4 OF THE GROUP, EVERY DAY I WOULD DO DECREES THAT WOULD
5 DISSIPATE THE EVIL ENERGIES AROUND ME. AND IF THERE WAS --
6 THERE WERE CONDITIONS IN THE WORLD THAT BECAME A FOCUS OF
7 EVIL ENERGIES, I WOULD PRAY AND DECREE TO HAVE THOSE EVIL
8 ENERGIES DISSIPATED.

9 IT IS VERY MUCH LIKE -- AS A CHRISTIAN, WHAT IT
10 IS COMPARABLE TO, I BELIEVE AS A CHRISTIAN THAT I AM A
11 SINNER. SO EVERY DAY I WANT TO CONFESS MY SINS AND ASK
12 FORGIVENESS FOR THEM. AND IF THERE ARE PEOPLE THAT I KNOW
13 WHO ARE PARTICULARLY CAUGHT UP IN SOME SIN, I WOULD PRAY FOR
14 THEM, THAT THAT SIN WILL BE TAKEN CARE OF, THAT THEY WILL
15 ASK FORGIVENESS FOR IT AND RECEIVE FORGIVENESS FOR IT.

16 SO IN LIKE MEASURE, THE CHURCH UNIVERSAL WOULD
17 SAY IF THEY SEE SOMEONE WHO IS PARTICULARLY CAUGHT UP IN A
18 MORASS OF EVIL ENERGY, THEY WOULD PRAY TO HAVE THAT MORASS
19 OF EVIL ENERGY THAT SURROUNDS THEM DISSIPATED SO THAT THEIR
20 GOD SELF CAN SHOW THROUGH. SO IT IS VERY COMPARABLE.

21 Q WE HAVE HEARD TESTIMONY THAT STAFF MEMBERS WORK
22 FOR ROOM AND BOARD AND RECEIVE LITTLE, IF ANY, SALARY.

23 IS THAT UNIQUE TO THAT RELIGION?

24 A NO. ALMOST ANY KIND OF RELIGION WHO HAS SOME
25 KIND OF ORDERED GROUP AS A PART OF IT HAVE AS PART OF THAT
26 ORDERING OF THE GROUP A VOW OF EITHER POVERTY OR A VOW TO
27 LIVE A REDUCED LIFE. AMONG PROTESTANTS, THERE ARE GROUPS
28 WHO HAVE BECOME DEVOTED TO THE SIMPLE LIFE. THEY REFUSE TO

1 LIVE ON MORE THAN A FEW THOUSAND DOLLARS A YEAR.

2 I HAVE SOME VERY GOOD FRIENDS IN CHICAGO WHO
3 REPORTED TO ME JUST A COUPLE OF WEEKS AGO THAT THEY HAD
4 FINALLY GOTTEN THEIR FINANCES SIFTED DOWN AND THE MEMBERS OF
5 THE GROUP WERE LIVING ON \$2,500 A YEAR, THAT THAT WAS THEIR
6 COMMITMENT. SO THAT THE REST OF THE MONEY THAT THEY RAISED
7 WENT TO THEIR SOCIAL SERVICES AND THEIR RECRUITMENT FOR NEW
8 MEMBERS TO THE GROUP.

9 I HAVE A GOOD FRIEND WHO IS A JESUIT PRIEST.
10 HE IS IN THE JESUIT ORDER WITHIN THE ROMAN CATHOLIC CHURCH.
11 HE IS A FULL PROFESSOR AT DETROIT UNIVERSITY. HE WORKS FOR
12 HIS ROOM AND BOARD AND EXPENSES AS A FULL PROFESSOR. THAT
13 IS VERY, VERY COMMON WITH PROTESTANT GROUPS, CATHOLIC
14 GROUPS, HINDU, BUDDHIST.

15 ANY TIME THAT YOU HAVE -- THAT YOU ACCEPT AN
16 ORDERED CONDITION, THEN USUALLY AS PART AND PARCEL OF THAT
17 IS A REDUCED FINANCIAL LIFESTYLE.

18 Q ARE YOU FAMILIAR WITH CHURCH UNIVERSAL AND
19 TRIUMPHANT'S RECRUITMENT TECHNIQUES?

20 A YES, I AM. IT'S BEEN QUITE INTERESTING TO
21 FOLLOW THEM BECAUSE THEY ARE SOMEWHAT UNUSUAL FOR NEW AGE
22 GROUPS. MOST OF THEIR RECRUITMENT HAS ALWAYS BEEN DONE, AT
23 LEAST FROM THE EARLY VERY INFORMAL YEARS WHEN THEY WEREN'T
24 DOING MUCH OF ANYTHING, THROUGH ADVERTISEMENT IN MEDIA.
25 PARTICULARLY FATE MAGAZINE I AM FAMILIAR WITH, WHICH IS THE
26 LARGEST CIRCULATING PERIODICAL IN THE OCCULT NEW AGE
27 COMMUNITIES. THEY HAVE A FULL PAGE AD IN THERE EVERY MONTH.

28 WHAT MAKES THIS SO DIFFERENT IS THAT A PERSON,

1 TO BECOME AFFILIATED WITH THE CHURCH, HAS TO TAKE A VERY
2 ACTIVE ROLE. THAT IS THEY ARE NOT BUTTONHOLED AND BROUGHT
3 INTO A SEMINAR FOR A WEEKEND AND SORT OF PRESSURED INTO
4 BECOMING A PART OF THE GROUP. THEY HAVE TO TAKE AN ACTIVE
5 ROLE IN RESPONDING TO A VERY IMPERSONAL AD IN THE MEDIA.

6 ONCE THEY RESPOND TO THAT AD, THEN THEY ARE PUT
7 ON A MAILING LIST TO RECEIVE A MAGAZINE CALLED PEARLS OF
8 WISDOM. IT COMES OUT EVERY WEEK. AND THE PEARLS PROVIDE
9 CONTEMPORANEOUS MESSAGES FROM CHURCH HEADQUARTERS. USUALLY
10 IT CONTAINS DICTATIONS FROM THE MASTERS THROUGH MRS.
11 PROPHET.

12 AND THEN THEY ARE OFFERED THE OPTION OF
13 BECOMING WHAT'S CALLED KEEPER OF THE FLAME. IF THEY CHOOSE
14 TO BECOME A KEEPER OF THE FLAME, THEY AGAIN HAVE TO BECOME
15 VERY ACTIVE IN THE PROCESS AND RESPOND TO A MAILING TO DO
16 THAT.

17 IF THEY BECOME A KEEPER OF THE FLAME, THEN THEY
18 GO THROUGH A SERIES OF LESSONS THAT ARE MAILED TO THEM IN
19 THEIR HOME. THEY GO THROUGH SEVEN LESSONS THAT ARE SORT OF
20 THE FIRST LEVEL AND THEN THERE ARE A NUMBER OF OTHERS. I
21 THINK THERE ARE SOMEWHERE BETWEEN 24 AND 30, THE NUMBER HAS
22 GROWN A LITTLE BIT OVER RECENT YEARS. NUMBER OF LESSONS
23 WHICH EXPLAIN TO THEM THE BELIEFS AND PRACTICES OF THE
24 GROUP.

25 AFTER THEY BECOME A KEEPER OF THE FLAME, THEN
26 THEY HAVE THE OPTION OF GOING TO SUMMIT UNIVERSITY. MOST OF
27 THE MEMBERS NEVER DO, OR MOST OF THE PEOPLE AFFILIATED WITH
28 THE CHURCH. THERE IS A DIFFERENCE BETWEEN BEING AFFILIATED

1 WITH THE CHURCH AND BEING A MEMBER OF IT. MOST OF THE
2 PEOPLE NEVER GO TO SUMMIT UNIVERSITY. BUT SOME DO.

3 BUT IF THEY DO, THEY AGAIN HAVE TO RESPOND TO
4 SOME CORRESPONDENCE THAT OFFERS THEM THAT OPPORTUNITY. AND
5 THEY HAVE TO PAY A TUITION FEE AND GO TO THE SCHOOL. THIS
6 IS REALLY FOR MOST OF THEM THEIR FIRST REAL ENCOUNTER WITH
7 THE CHURCH AS A GROUP.

8 MOST OF THE PEOPLE THAT ARE AFFILIATED WITH THE
9 CHURCH HAVE NO ONGOING RELATIONSHIP TO OTHER MEMBERS OF THE
10 CHURCH. THEY ARE RELATED BY CORRESPONDENCE TO THE GROUP.

11 SEVERAL TIMES A YEAR THEY ALSO HAVE THE OPTION
12 OF COMING TO CONVOCATIONS THAT ARE HELD NOW USUALLY AT
13 CAMELOT. BUT THEY HAVE BEEN HELD AT VARIOUS PLACES FROM
14 COLORADO TO MOUNT SHASTA IN NORTHERN CALIFORNIA. THESE ARE
15 WEEK-LONG AFFAIRS, FOUR TO SIX, SEVEN DAYS THAT ARE HELD AT
16 VARIOUS TIMES OF THE YEAR.

17 WHAT IS UNUSUAL ABOUT THE GROUP IS KIND OF THE
18 LOOSENESS OF THE ORGANIZATION, ESPECIALLY DURING THE FIRST
19 COUPLE OF YEARS THAT PEOPLE ARE GENERALLY AFFILIATED WITH
20 THEM. ONCE THEY HAVE GO THROUGH THE TEACHINGS, ONCE THEY
21 UNDERSTAND WHAT'S HAPPENING, THEN THEY CAN GO FOR MORE
22 INTENSE EXPERIENCES.

23 A FEW MIGHT BECOME MEMBERS OF A CENTER, LIVE IN
24 RESIDENCES. BUT THERE ARE ONLY A HANDFUL OF CENTERS AND
25 EACH CENTER HAS A VERY LOW CAPACITY. SO FOR A LARGE NUMBER,
26 THAT IS NOT A BIG EXPERIENCE.

27 AND A VERY, VERY FEW MIGHT BE INVITED TO COME
28 TO CAMELOT AND EVEN FEWER STILL BECOME PART OF THE PERMANENT

1 STAFF AT CAMELOT. TO BECOME PART OF THE PERMANENT STAFF IS
2 REALLY TO ENTER INTO AN ORDERED EXISTENCE THAT IS SIMILAR TO
3 JOINING A MONASTIC ORDER.

4 Q BASED ON YOUR STUDIES OF OTHER NEW AGE AND MAIN
5 LINE RELIGIONS, HOW WOULD YOU CHARACTERIZE THESE RECRUITMENT
6 TECHNIQUES?

7 A THEY ARE VERY LOW-KEY. THEY, OF COURSE, ARE IN
8 STARK CONTRAST TO WHAT WE HAVE GENERALLY CALLED THE CULTS,
9 WHO DO HAVE HIGH PRESSURE KINDS OF EVANGELISM WHERE THEY
10 TAKE PEOPLE OFF THE STREET, AND RUN THEM IMMEDIATELY INTO AN
11 INTENSE EXPERIENCE, AND THEN MAKE THEM MEMBERS OF THE GROUP,
12 AND PUT THEM TO WORK AND THEY ARE KIND OF AT IT DAY AND
13 NIGHT.

14 WITH SUMMIT AND WITH THE CHURCH THAT FOLLOWS
15 IT, THE PERIOD OF TIME THAT YOU ARE INVOLVED IN BECOMING A
16 PART OF THE CHURCH, YOU HAVE A LOT OF TIME TO TEST OUT THE
17 PRACTICES OF THE GROUP, PARTICULARLY DECREEING, SEE IF YOU
18 LIKE IT OR NOT, TO GET TO KNOW WHAT THE CHURCH BELIEFS ARE
19 IN THE PRIVACY OF YOUR OWN HOME BEFORE YOU EVER HAVE ANY
20 GROUP EXPERIENCES OF IT.

21 AND OVERWHELMINGLY, THE PEOPLE WHO BECOME
22 AFFILIATED WITH THE CHURCH, EVEN AT THE BASIC LEVEL, HAVE
23 ALREADY HAD A GOOD DEAL OF ASSOCIATION WITH OTHER OCCULT
24 GROUPS OR THEY HAVE READ OTHER OCCULT BOOKS.

25 AND I AM QUITE SURE THAT IF WE TOOK -- WERE
26 ABLE TO TAKE A SURVEY OF THE GROUP, WE WOULD FIND THAT MOST
27 OF THEM HAD ENCOUNTERED ASCENDED MASTER TEACHINGS AND I AM
28 TEACHINGS PRIOR TO THEIR BECOMING A PART OF THIS GROUP. SO

1 THAT THEY WERE ALREADY ATTUNED TO THE TEACHINGS AT LEAST IN
2 SOME BASIC WAY BEFORE THEY BECAME A PART OF IT.

3 I KNOW THAT CERTAINLY IN TERMS OF MY OWN
4 CHURCH, THEIR RECRUITMENT METHODS ARE MUCH LOWER KEY THAN
5 METHODISM IS. AS A CHURCH, WE WENT OUT IN THE NEIGHBORHOOD
6 AND KNOCKED ON DOORS COLD TO LOCATE PEOPLE WHO WERE
7 UNAFFILIATED. WE WOULD INVITE THEM TO THE CHURCH, INVITE
8 THEM TO BECOME MEMBERS, WOULD TEACH THEM WHAT METHODISM WAS
9 ALL ABOUT LATER ON DOWN THE LINE. BUT IF THEY LIKED THE
10 FELLOWSHIP AND THE GROUP, THAT WAS FINE.

11 I KNOW I JUST HAD THE EXPERIENCE IN MY CHURCH
12 IN SANTA BARBARA THAT I HAVE JOINED OF TEACHING A SUNDAY
13 SCHOOL CLASS, AN ADULT SUNDAY SCHOOL CLASS ON BASIC
14 METHODISM.

15 AND I THOUGHT IT WAS PRETTY STANDARD MATERIAL
16 IN THE HISTORY AND BELIEFS OF THE CHURCH AND HERE I FOUND
17 MEMBERS WHO HAD BEEN AROUND FOR SEVERAL YEARS WHO REALLY
18 DIDN'T UNDERSTAND HOW THE CHURCH WAS ORGANIZED, WHERE THE
19 POWER FLOWED, WHAT THE DOCTRINAL STANDARDS OF THE CHURCH
20 WERE.

21 SO THAT THE MOVING INTO THE CHURCH UNIVERSAL
22 TRIUMPHANT IS A FAIRLY SLOW PROCESS AND IT ALLOWS A LOT OF
23 TIME FOR THOUGHT AND FOR THOUGHTFUL REFLECTION.

24 Q WE HAVE HEARD TESTIMONY THAT CHURCH MEMBERS ARE
25 DEDICATED TO THE SPIRITUAL LEADER, ELIZABETH CLARE PROPHET.

26 IS IT UNUSUAL FOR CHURCH MEMBERS TO BE
27 DEDICATED TO THEIR SPIRITUAL LEADER?

28 A NO. SPIRITUAL LEADERS, RELIGIOUS LEADERS IN

1 GENERAL, IF THEY SHOW ANY FLARE OF CHARISMA, GENERALLY PULL
2 DEVOTION OUT OF THEIR FOLLOWERS. MEMBERS OF GROUPS ARE
3 READY TO GIVE DEVOTION QUITE APART FROM THAT.

4 I AM NOT PARTICULARLY A CHARISMATIC PERSON, BUT
5 I FOUND AS A PASTOR I HAD MEMBERS WHO WERE WILLING TO DO
6 ANYTHING I WANTED THEM TO DO QUITE APART FROM MY ASKING
7 THEM.

8 LEADERS, WHETHER THEY BE CHARISMATIC
9 PENTECOSTAL LEADERS OR LEADERS WHO CLAIM MORE DIRECT
10 RELATIONSHIPS TO GOD OR WHAT HAVE YOU, DO CLAIM A LOT OF
11 DEVOTION. THAT IS USUALLY PRETTY MUCH A PERSONAL FACTOR,
12 HOWEVER. THAT IS THEY WANT LEADER WHO IS ATTRACTIVE, A
13 LEADER WHO SPEAKS WELL, A LEADER WHO GENERATES EXCITEMENT,
14 THERE IS MORE DEVOTION TENDS TO FLOW THEIR WAY.

15 ORAL ROBERTS IS SUCH A PERSON, FOR EXAMPLE. HE
16 CLAIMS A GREAT DEAL OF DEVOTION FROM HIS FOLLOWERS QUITE
17 APART FROM HIS ASKING FOR IT.

18 Q OVERALL TAKING ALL OF THE CHARACTERISTICS WITH
19 WHICH YOU ARE FAMILIAR OF CHURCH UNIVERSAL AND TRIUMPHANT,
20 IS IT IN ANY WAY UNIQUE AMONG THE RELIGIONS YOU'VE STUDIED?

21 A IT IS UNIQUE IN THE SENSE THAT EVERY RELIGIOUS
22 GROUP HAS ITS OWN PECULIARITIES. EVERY CHURCH HAS ITS
23 LITTLE WAY IT IS DIFFERENT. EVERY GROUP HAS ITS OWN
24 PARTICULAR JARGON. BUT I HAVE BEEN ABLE -- UNABLE TO FIND
25 ANYTHING ABOUT THE CHURCH THAT DOESN'T HAVE ITS DIRECT
26 COUNTERPART IN THE MAJOR RELIGIOUS TRADITIONS OF THE WORLD.

27 MR. KLEIN: THANK YOU.

28 NO FURTHER QUESTIONS, YOUR HONOR.

1 MR. LEVY: THANK YOU, YOUR HONOR.

2

3

CROSS-EXAMINATION +

4

BY MR. LEVY:

5

6

7

Q YOUR CURRICULUM VITAE LISTED YOU BOTH AS A DOCTOR AND A REVEREND. WHICH ARE YOU MORE COMFORTABLE WITH, SIR?

8

9

A I AM ACTUALLY MORE COMFORTABLE WITH GORDON, BUT DOCTOR WILL BE FINE.

10

11

12

Q I DON'T WANT TO BE PRESUMPTUOUS CALLING YOU GORDON BECAUSE THEN YOU MIGHT CALL ME LARRY AND THEN MR. KLEIN MIGHT GET UPSET.

13

14

15

16

YOU WERE SOMEWHAT MODEST WHEN YOU TOLD US ABOUT YOUR EDUCATIONAL BACKGROUND. I NOTE IN YOUR LIST OF YOUR ACCOMPLISHMENTS, YOU ALSO GOT A DEGREE -- AN UNDERGRADUATE DEGREE IN GEOLOGY.

17

18

19

20

A YES.
Q NOW, I DON'T CONSIDER MYSELF A RELIGIONIST. AND I ASSUME AS A MINISTER, SOMETIMES YOU BURY PEOPLE, DO YOU?

21

22

23

24

A OH, YES.
Q DO YOU REALLY HAVE TO GET A DEGREE IN GEOLOGY AND KNOW ABOUT THE GROUND? YOU DON'T REALLY DIG THE HOLES, DO YOU?

25

26

27

28

A FORTUNATELY, NOT.
Q THANK YOU FOR CLEARING THAT UP.
A SOMETIMES I HAVE TO THROW THE FIRST DIRT IN TO COVER THEM UP, BUT THAT IS ALL.

1 Q THE ONE THING I MISSED IN YOUR ACCOMPLISHMENTS
2 WAS I DIDN'T NOTICE ANY DEGREES IN PSYCHOLOGY OR PSYCHIATRY
3 OR HUMAN BEHAVIOR. DO YOU HAVE ANY ADVANCED DEGREES IN ANY
4 OF THOSE SUBJECTS?

5 A NO.

6 Q THERE WAS A TIME WHEN IN THE LIST OF YOUR
7 ACCOMPLISHMENTS THAT SAYS THAT YOU GAVE A SEMINAR AND IT WAS
8 FOR THE SOCIETY FOR THE SCIENTIFIC STUDY OF RELIGION. THAT
9 WAS AT CINCINNATI, OHIO, IN 1980, WAS IT?

10 A I SPOKE AT A SESSION OF THE SOCIETY AT THAT
11 TIME, YES.

12 Q DO YOU REMEMBER WHAT THE TOPIC WAS THAT YOU
13 SPOKE ABOUT?

14 A SEEMS LIKE IT WAS DEPROGRAMMING.

15 Q LET ME GIVE YOU THE FULL TITLE.
16 "DEPROGRAMMING, A RESPONSE TO THE RISE OF CULTS."

17 A YES.

18 Q DO YOU FEEL THAT DEPROGRAMMING MAY BE VALUABLE
19 ON OCCASION IN WORKING WITH A PERSON WHO HAS HAD WHAT THEY
20 CONSIDER A BAD EXPERIENCE WITH A CULT?

21 A NO.

22 Q WOULD YOU TELL ME WHY YOU DON'T THINK
23 DEPROGRAMMING MIGHT BE OF ASSISTANCE?

24 A BASICALLY BECAUSE IT IS DONE BY PEOPLE OVERALL
25 WHO DO NOT HAVE THE KIND OF PROFESSIONAL PSYCHOLOGICAL
26 TRAINING THAT IS NECESSARY TO DO WHAT DEPROGRAMMERS WANT TO
27 DO.

28 Q DO YOU HAVE THAT KIND OF PSYCHOLOGICAL AND

1 PROFESSIONAL TRAINING?

2 A NO.

3 Q ARE YOU AT THE PRESENT TIME A CONTRIBUTOR TO
4 ANY REGULAR MEDICAL OR PSYCHOLOGICAL JOURNALS?

5 A NO.

6 Q YOU USED TO CONTRIBUTE REGULARLY TO -- YOU
7 MENTIONED THAT MAGAZINE, FATE MAGAZINE. I JUST HAPPEN TO
8 HAVE A CURRENT COPY OF IT. YOU WERE FOR A REGULAR TIME --

9 A FOR SEVERAL YEARS I WAS THEIR BOOK REVIEW
10 EDITOR.

11 Q ASIDE FROM THIS MAGAZINE, WERE THERE ANY OTHER
12 MEDICAL OR PSYCHOLOGICAL PERIODICALS THAT YOU WERE A REGULAR
13 CONTRIBUTOR TO?

14 A NO.

15 Q THERE WAS AN ARTICLE IN THERE IN MARCH OF 1979
16 THAT WAS AN INTERVIEW WITH YOURSELF.

17 WITH REGARD TO THAT ARTICLE, I AM CURIOUS IF
18 YOUR OPINION IS WITH REGARD TO DEPENDENT PERSONALITIES?
19 WOULD IT BE A FAIR STATEMENT TO SAY THAT THE NEW WAVE
20 RELIGIONS SEEM TO ATTRACT PEOPLE WHO ARE DEPENDENT
21 PERSONALITIES?

22 A I WOULD NOT SO CHARACTERIZE THEM. THEY TEND,
23 AS FAR AS I CAN TELL, TO ATTRACT PEOPLE FROM THE GENERAL
24 PUBLIC AND AMONG THEM ARE PEOPLE WITH DEPENDENT
25 PERSONALITIES. BUT I WOULD ALSO HASTEN TO ADD THAT I DON'T
26 REALLY FEEL QUALIFIED TO SPEAK ON THAT, ESPECIALLY IN THIS
27 AUGUST ASSEMBLY.

28 Q WELL, I REMIND YOU IN YOUR ARTICLE YOU ARE

1 QUOTED AS SAYING: (READING.)

2 "I HAVE COME MORE AND MORE TO
3 FEEL THAT THERE ARE PEOPLE WHO HAVE
4 DEPENDENT PERSONALITIES. AND WHY THEY ARE
5 DEPENDENT, I DON'T KNOW. BUT THERE ARE
6 PEOPLE WHO ARE ALWAYS GOING TO NEED SOMEONE
7 TO TELL THEM WHAT TO DO. AND IT APPEARS
8 THAT THE AUTHORITARIAN GROUPS LIKE CULTS
9 SEEM TO ATTRACT THAT TYPE OF PERSON."

10 WOULD THAT BE AN ACCURATE STATEMENT OR AN
11 ACCURATE QUOTE BY YOURSELF AT THAT TIME SINCE IT IS --

12 A COULD HAVE BEEN, YES.

13 Q NOW, WE'VE HEARD AT THIS TRIAL AN AWFUL LOT
14 ABOUT BRAINWASHING. WE'VE MADE IT CLEAR TO THE JURY AND THE
15 PEOPLE HERE THAT WE ON MR. MULL'S SIDE HAVE NEVER APPROACHED
16 THE SUBJECT OF BRAINWASHING BECAUSE IT CONJURES UP THOUGHTS
17 OF PRISONS AND BARS AND GUNS AND THAT SORT OF THING.

18 IN THIS ARTICLE WHERE YOU WERE A CONTRIBUTOR,
19 YOU SOMEWHAT AGREE WITH THAT. IT SAYS: (READING.)

20 "I'M NOT SURE THAT BRAINWASHING
21 IS QUITE THE RIGHT WORD, AT LEAST NOT IN THE
22 SENSE THAT IT WAS USED AGAINST AMERICAN
23 PRISONERS IN NORTH KOREA AND CHINA. WHAT'S
24 INVOLVED HERE I THINK IS A THOROUGH-GOING
25 INDOCTRINATION SYSTEM REINFORCED THROUGH
26 ISOLATION. THE OUTSIDE INFLUENCES CAN BE
27 CONTROLLED AND THE MODERATING INFLUENCES OF
28 THE OUTSIDE WORLD DONE AWAY WITH. A GROUP

1 DYNAMIC TAKES OVER AND PEOPLE BECOME VERY
2 SUGGESTIBLE."

3 DO YOU STILL HAVE THAT OPINION?

4 A WITH SOME GROUPS, YES.

5 Q NOW, I NOTICE WHEN YOU WERE DISCUSSING YOUR
6 RESEARCH ON CHURCH UNIVERSAL AND TRIUMPHANT, YOU TOLD US
7 THAT YOU WENT TO SOME CONFERENCES THAT LASTED FROM FOUR TO
8 SEVEN DAYS?

9 A I DID NOT, NO. I WENT TO -- MOST OF THE
10 CONFERENCES I WENT TO WERE ONE-DAY AFFAIRS OR WEEKEND
11 AFFAIRS.

12 Q WAS THE GENERAL PUBLIC INVITED TO THOSE?

13 A YES.

14 Q NOW, IN YOUR WORK AS A MINISTER AND AS A DOCTOR
15 OF RELIGION, WOULD IT BE A FAIR STATEMENT TO SAY AND WOULD
16 YOU AGREE WITH THAT MOST PEOPLE AT A PUBLIC OCCASION PUT
17 THEIR BEST FOOT FORWARD?

18 A OH, YES.

19 Q SO IT WOULD BE A FAIR CONCLUSION TO REACH THAT
20 IF THE GENERAL PUBLIC CAME TO A ONE-DAY OR A WEEKEND AFFAIR,
21 THEY MIGHT ANTICIPATE A VERY NICE DISPLAY AND NOTHING
22 PERSONALLY OBJECTIONABLE?

23 A I THINK THE ATTEMPT WOULD BE MADE TO DO THAT,
24 YES.

25 Q DID YOU EVER ATTEND SUMMIT UNIVERSITY?

26 A I HAVE ATTENDED IT AS AN OBSERVER. I HAVE
27 NEVER ATTENDED IT FOR A PERIOD OF TIME.

28 Q WHEN YOU SAY YOU ATTENDED IT --

1 A MEANING I SAT IN ON SESSIONS THERE.

2 Q WHEN YOU SAT IN, WAS IT FOR A FULL DAY OR FOR A
3 FULL WEEK OR FOR A FULL MONTH OR FOR HOW LONG?

4 A IT WAS FOR PERIODS USUALLY PARTS OF DAYS. I
5 WOULD GO IN AND OBSERVE, I WOULD LEAVE, GO DO SOMETHING
6 ELSE, COME BACK, OBSERVE SOME MORE. I WOULD WATCH PEOPLE
7 DURING THE CLASSES WHEN THERE WERE DIFFERENT ACTIVITIES
8 GOING ON, I WOULD OBSERVE THEM AT BREAK TIME. I WOULD WATCH
9 THEM MOVE FROM ONE CLASS TO A BREAK PERIOD TO ANOTHER CLASS.

10 Q DID YOU EVER INTERVIEW ANYONE, SAY,
11 PERIODICALLY, AFTER A WEEK AT SUMMIT UNIVERSITY AND THEN
12 AFTER A MONTH AT SUMMIT UNIVERSITY AND THEN AT THE
13 CONCLUSION OF THREE MONTHS?

14 A NO.

15 Q DID YOU EVER JOIN THE STUDENTS IN FASTING?

16 A NO.

17 Q DID YOU EVER PARTAKE OF THE DIET FOR, SAY, A
18 WEEK-LONG PERIOD?

19 A NO. I HAVE PARTAKEN OF THE DIET FOR TWO OR
20 THREE DAYS. THAT IS THE LONGEST. I HAVE NEVER BEEN ABLE TO
21 GIVE A WEEK TO TAKE OFF FROM WORK THAT LONG.

22 Q IN THE COURSE OF YOUR INTERVIEWING SOME 900 OR
23 MORE GROUPS, I CAN APPRECIATE THAT YOU REALLY DON'T HAVE AN
24 AWFUL LOT OF TIME TO SPEND WITH ANY ONE OF THEM.

25 MR. KLEIN: I AM GOING TO OBJECT. IS THAT A QUESTION
26 OR STATEMENT BY COUNSEL?

27 THE COURT: OBJECTION IS SUSTAINED.

28 Q BY MR. LEVY: NOW, YOU DEFINED A NUMBER OF

1 CHARACTERISTICS OF RELIGIONS. AND YOU SAID A RELIGION, IF I
2 JOTTED DOWN CORRECTLY, HAS TO BE INTERESTED IN WHERE DO WE
3 COME FROM, WHY ARE WE HERE AND WHERE ARE WE GOING?

4 YOU COMPILED A LIST, YOU SAY IT IS NOW UP TO
5 1,800 RELIGIONS?

6 A RIGHT.

7 Q BACK IN THE 1980'S, IT WAS ONLY UP TO 1,200
8 RELIGIONS?

9 A IN THE MIDSEVENTIES, IT WAS AROUND 1,200. BY
10 THE END OF THE SEVENTIES, IT WAS UP TO ABOUT 1,500. AND NOW
11 IT IS UP TO ABOUT 1,800.

12 Q WHAT WOULD IT HAVE BEEN IN THE EARLY EIGHTIES?

13 A EARLY EIGHTIES, 1,600.

14 Q YOU ALSO PUBLISHED AN ARTICLE OR HAD PUBLISHED
15 FOR YOU AN ARTICLE -- WELL, BEFORE I GET TO THAT ARTICLE, WE
16 WERE TALKING ABOUT DEPENDENT PERSONALITIES AND THE ARTICLE
17 THAT WAS IN FATE MAGAZINE. YOU MADE THE STATEMENT IN FATE
18 MAGAZINE IN THAT INTERVIEW AT THAT TIME AND YOU ARE
19 SPECIFICALLY QUOTED AS SAYING THAT: (READING.)

20 "OUR KNOWLEDGE OF PSYCHOLOGY IS
21 NOT DEVELOPED TO THE POINT THAT WE KNOW WHAT
22 CAUSES DEPENDENT PERSONALITIES."

23 NOW, YOU ARE NOT TRAINED IN PSYCHOLOGY OR
24 PSYCHIATRY OR HUMAN BEHAVIOR. WAS THAT JUST YOUR GENERAL
25 OPINION OR WERE YOU REFLECTING THE OPINION OF THE MEDICAL
26 COMMUNITY?

27 A IT IS MY GENERAL OPINION BASED UPON WHAT SMALL
28 AMOUNT OF READING I HAVE BEEN ABLE TO DO IN THE AREA.

1 Q I AM CURIOUS, DO YOU THINK THAT CULTIC
2 INDOCTRINATION PLACE A SIGNIFICANT PART IN MAKING PEOPLE
3 VERY SUGGESTIBLE TO CULT LEADERS?

4 A I WOULD VENTURE ONLY WHAT IS MY PURELY PERSONAL
5 OPINION, AND WOULD EXIT FROM MY ROLE AS AN EXPERT AT THIS
6 TRIAL AND SAY NO. I THINK THAT THAT IS PROBABLY A PART OF
7 THE DEVELOPMENTAL PROCESS IN CHILDHOOD AND THAT PEOPLE MAY
8 EXPRESS THAT THROUGH A RELIGION.

9 BUT I HAVE MET PEOPLE THAT I WOULD CALL
10 DEPENDENT PERSONS IN EVERY RELIGIOUS GROUP I HAVE EVER DONE
11 ANY STUDY OF, BE THEY MAIN LINE CHURCHES OR CULTS. AND I
12 HAVE MET THEM AS CATHOLICS AND I HAVE MET THEM AS METHODISTS
13 AND I HAVE MET THEM AS MEMBERS OF CULT GROUPS, SO-CALLED.

14 AND I HAVE NEVER SEEN -- I DON'T KNOW HOW YOU
15 WOULD DEVELOP THAT OTHER THAN THROUGH THE DEVELOPMENTAL
16 PROCESS IN CHILDHOOD.

17 Q NOW, I APPRECIATE ALL THAT INFORMATION.
18 UNFORTUNATELY, IT HAS NOTHING TO DO WITH MY QUESTION.

19 WHAT MY QUESTION IS, SIR, IS DO YOU THINK THAT
20 CULTIC INDOCTRINATION HAS A SIGNIFICANT PART IN MAKING
21 PEOPLE SUGGESTIBLE TO CULT LEADERS?

22 A NO.

23 Q WELL, THEN YOUR OPINION IS CHANGED FROM WHAT'S
24 IN THE ARTICLE, SOME PARTS OF WHAT I JUST READ TO YOU A FEW
25 MOMENTS AGO. WHEN THE OUTSIDE INFLUENCES CAN BE CONTROLLED,
26 WHERE THERE IS A THOROUGH GOING INDOCTRINATION, PEOPLE
27 BECOME VERY SUGGESTIBLE TO THE GROUP LEADER.

28 IS YOUR OPINION TODAY DIFFERENT FROM WHAT IT

1 WAS WHEN YOU WROTE THE ARTICLE?

2 A NO. MY OPINION IS THAT IF YOU OVER A PERIOD OF
3 TIME DEVELOP A VERY CONTROLLED ENVIRONMENT WHERE OUTSIDE
4 INFLUENCE WAS CUT TO ALMOST NOTHING, YOU COULD MAKE A
5 COMMUNITY AS OPPOSED TO INDIVIDUALS SUSCEPTIBLE TO SOME
6 SUGGESTIONS BY A GROUP.

7 I HAVE SPECIFIC REFERENCE, IF I REMEMBER
8 CORRECTLY, IN THAT ARTICLE TO JONESTOWN WHERE THE GROUP WAS
9 LIVING IN ISOLATION IN A FOREIGN COUNTRY WITH NO MEDIA, NOT
10 EVEN NEWSPAPERS COMING IN.

11 IN THAT KIND OF CASE WHERE THE GROUP WAS BEING
12 TRAINED TO DO CERTAIN THINGS OVER A PERIOD OF TIME, THEY
13 THEN BECAME SUGGESTED -- IT WAS EASY -- EASIER TO MOVE TO
14 REPEATING THOSE THINGS AS TIME WENT ON.

15 Q NOW, I KNOW YOU ARE NOT A PSYCHOLOGIST OR A
16 HUMAN BEHAVIORIST OR A PSYCHIATRIST, BUT I WONDER IF AS A
17 REVEREND AND A DOCTOR IF YOU THINK THE EXPERIENCE AT THAT
18 PLACE THAT YOU MENTIONED, JONESTOWN, WAS A BENIGN AND
19 FAVORABLE EXPERIENCE FOR THE MEMBERS OF THE PEOPLE'S TEMPLE?

20 A THAT HAS BOTH A YES AND NO ANSWER TO IT IF I
21 MAY BE SO BOLD. NO, BECAUSE THE ULTIMATE OUTCOME OF IT WAS
22 NOT.

23 ONE OF THE REASONS THAT PEOPLE WHO LIVE THERE
24 WENT THERE IS BECAUSE THEIR INITIAL EXPERIENCE THAT THIS WAS
25 A GREATEST THING THAT THEY HAD EVER EXPERIENCED. MANY OF
26 THE MEMBERS OF THE GROUP WERE VERY POOR BLACKS WHO HAD
27 EXPERIENCED RATHER HARSH LIVING CONDITIONS HERE.

28 AND EVEN WHAT -- WHEN THE LIVING CONDITIONS AT

1 JONESTOWN WERE DESCRIBED TO ME, I SAID I WOULDN'T LIVE UNDER
2 THOSE CONDITIONS. BUT FOR MANY OF THE PEOPLE THERE, THAT
3 WAS THE BEST CONDITIONS THEY HAD EVER LIVED IN. THEY HAD A
4 FLOOR UNDER THEIR FEET FOR THE FIRST TIME FOR SOME OF THEM.

5 SO IT STARTED OUT AS FOR THEM A VERY BENIGN
6 EVEN VERY POSITIVE EXPERIENCE. AS IT DEVELOPED, IT OF
7 COURSE TURNED ON THEM VERY, VERY MUCH AND THAT ISOLATED
8 CONDITION THAT THEY LIVED IN FOR SEVERAL YEARS CONTRIBUTED
9 TO THAT.

10 Q YOU FIND ANY COROLLARIES BETWEEN WHAT HAPPENED
11 THERE AND SOME OF THE THINGS THAT PEOPLE WHO WERE NOT
12 NECESSARILY FAVORABLE TO CHURCH UNIVERSAL AND TRIUMPHANT
13 HAVE REPORTED THAT THEY EXPERIENCED AT CHURCH UNIVERSAL AND
14 TRIUMPHANT?

15 A NOT REALLY BECAUSE THE CONDITIONS -- WELL, OF
16 COURSE OVERALL THE CHURCH IS SO LOOSELY ORGANIZED THAT THE
17 COMPARISON BETWEEN IT AND JONESTOWN JUST GOES OUT THE WINDOW
18 ALMOST IMMEDIATELY.

19 BUT EVEN IF ONE CENTER IN -- SAY, ON A TEACHING
20 CENTER OR ON CAMELOT, AS THE EXAMPLE, OR ON SUMMIT
21 UNIVERSITY, WHAT YOU HAVE HERE IS A CONTROLLED ENVIRONMENT
22 FOR A PERIOD OF WEEKS WITH SUMMIT UNIVERSITY.

23 YOU ARE MAKING A TEN-WEEK COMMITMENT THEN YOU
24 HAVE GOT TO GO BACK TO THE REAL WORLD, SO TO SPEAK. IT IS
25 VERY MUCH LIKE RETREATS THAT ALMOST ALL CHURCHES HAVE. SO
26 THAT YOU ARE STILL IN CONTACT WITH THINGS. AND WHILE YOU
27 ARE THERE, OF COURSE YOUR MEDIA IS SOMEWHAT CONTROLLED.

28 BUT THE PEOPLE AT SUMMIT UNIVERSITY STILL HAVE

1 THEIR OUTSIDE INTERESTS, THEY STILL ARE CONCERNED ABOUT
2 THINGS THAT HAVE NOTHING TO DO WITH THE CHURCH. AND THEY,
3 AT THE END OF TEN WEEKS, GO BACK TO THE REAL WORLD.

4 THE PEOPLE WHO LIVE AT CAMELOT OF COURSE ARE
5 LIVING AN ORDERED EXISTENCE, VERY MUCH LIKE ANY MONASTIC
6 GROUP. AND AGAIN THEIR MEDIA ENVIRONMENT IS VERY MUCH
7 CONTROLLED. BUT IT IS NOT STIFLED IN THE SENSE THAT --
8 WELL, FOR EXAMPLE, THERE ARE NOT A LOT OF TELEVISIONS
9 AROUND.

10 THE TIME THAT I SPENT THERE IN THE EVENING, I
11 LIKE TO CLOSE THE EVENING WITH TELEVISION. AND THERE WASN'T
12 ONE TO DO IT. BUT NEWSPAPERS ARE READILY AVAILABLE SO THAT
13 THE FLOW OF INFORMATION IS THERE. THE PEOPLE WHO LIVE THERE
14 ARE INTERESTED IN SPORTS, AND THEY KNEW WHAT HAPPENED THE
15 DAY PREVIOUS TO THEIR BASEBALL TEAM AND THEY KEEP UP WITH
16 THINGS IN THE OUTSIDE WORLD.

17 SO, NO, THE PARALLELS ARE NOT THERE. THE
18 PARALLEL IS MUCH MORE LIKE A LARGE, LOOSE ORGANIZATION THAT
19 HAS A COUPLE OF CENTERS OF VERY DEDICATED FOLLOWERS VERY
20 MUCH LIKE THE ORDERS IN THE CATHOLIC CHURCH.

21 Q YOU KIND OF LIKEN SUMMIT UNIVERSITY TO A
22 RETREAT. IS MY UNDERSTANDING THAT A RETREAT IS A SOMEWHAT
23 CONTROLLED ISOLATED ENVIRONMENT WHERE YOU REALLY FOCUS ON
24 THE INTERESTS OF THE ORDER AT THE RETREAT?

25 A YOU FOCUS ON THE INTEREST OF THE ORDER AND ON
26 YOUR OWN INTERIOR SPIRITUAL LIFE.

27 Q BUT IT IS SOMEWHAT ISOLATED, IS IT NOT?

28 A OH, YES.

1 Q AND YOU CHARACTERIZE THE EXISTENCE AT CAMELOT
2 AS STRUCTURED LIKE IN AN ORDER, A CHURCH ORDER?

3 A VERY MUCH SO.

4 Q IN THOSE STRUCTURED CHURCH ORDERS, USUALLY THE
5 AUTHORITY IS AT THE TOP AND THE MEMBERS OF THE ORDER
6 PARTICIPATE, BUT ADHERE TO THE DICTATES OF THE ORDER?

7 A RIGHT. AND IN ROMAN CATHOLICISM FOR EXAMPLE,
8 IT IS THE TRADITIONAL VOWS ARE CHASTITY, POVERTY AND
9 OBEDIENCE. AND OBEDIENCE IS USUALLY OBEIENT TO THE ABBOT
10 OR MOTHER SUPERIOR OF THE ORDER.

11 Q IN THIS CASE, IF THERE IS A SPIRITUAL LEADER,
12 IT WOULD BE TO THE SPIRITUAL LEADER?

13 A WELL, ACTUALLY AT CAMELOT THE OBEDIENCE THERE
14 ARE NOT CLEARLY SPELLED OUT. THERE ARE SPIRITUAL DICTATES.
15 THEY ARE CERTAINLY EXPECTED TO FOLLOW A MORAL CODE. BUT
16 THERE IS NOT THE KIND OF ABSOLUTE OBEDIENCE AT LEAST SPELLED
17 OUT.

18 I AM SURE THAT IN PRACTICE IT WORKS THAT WAY,
19 BUT I FOUND NOTHING ABOUT TAKING A VOW OF OBEDIENCE WHERE
20 ONE IS EXPECTED TO FOLLOW AUTHORITY STRUCTURES AT LEAST IN
21 THE MAJOR DICTATES OF LIFE. THERE ARE CERTAIN FREE TIMES
22 LEFT.

23 Q AND IF THEY HAD AS PART OF THEIR ORGANIZATION
24 SOMETHING MAYBE CALLED SONS OR DAUGHTERS OF DOMINION WHERE
25 THE INDIVIDUAL MEMBERS OF THAT GROUP TAKE A VOW OF OBEDIENCE
26 AND DEDICATION, THEN YOU'D CONSIDER IT THAT THE PEOPLE WHO
27 ATTEND THERE ARE VERY MUCH DEDICATED AND UNDER AND SUBJECTED
28 TO THE RULE OF THE SPIRITUAL LEADER THERE, WOULD YOU NOT?

1 A YES.

2 Q DO YOU BELIEVE THAT RELIGIOUS LEADERS, AND I
3 DON'T WANT TO BE DEROGATORY TOWARD RELIGIOUS LEADERS, BUT DO
4 YOU BELIEVE THAT THEY KIND OF WANT TO MANIPULATE PEOPLE?

5 A YES.

6 Q PRETTY MUCH ACROSS THE BOARD?

7 A YES.

8 Q NOW, YOU WERE TALKING ABOUT 1,800 RELIGIONS AND
9 SAID THERE WAS UP TO ABOUT 1,600 OR SO IN THE EIGHTIES?

10 A YES. THAT WE KNEW ABOUT.

11 Q GOOD HOUSEKEEPING MAGAZINE, ANOTHER ONE OF
12 THOSE MEDICAL AND PHILOSOPHICAL JOURNALS, PUBLISHED AN
13 ARTICLE THAT YOU CONTRIBUTED TO. AND THEY LIST 1,200
14 RELIGIONS AND THEY EXCERPTED IT FROM YOUR RESEARCH.

15 THE CRITERIA I NOTICE IS A LITTLE BIT
16 DIFFERENT. WHEN YOU DESCRIBED THE CRITERIA FOR RELIGIONS,
17 YOU SAID WHERE DO WE COME FROM, WHY ARE WE HERE AND WHERE
18 ARE WE GOING?

19 IN THAT ARTICLE, YOUR CRITERIA WAS A CHURCH
20 MUST ACHIEVE RELIGIOUS LOYALTY OF ITS MEMBERS, IT MUST
21 PROMOTE ITS BELIEFS AND IT MUST BE BIG ENOUGH TO HAVE AT
22 LEAST TWO CONGREGATIONS OR ONE WITH OVER 2,000 PEOPLE.

23 DO YOU RECALL THE ARTICLE?

24 A IT'S BEEN AN EMBARRASSMENT TO ME EVER SINCE IT
25 APPEARED.

26 Q THAT IS THE ARTICLE. IT MIGHT CALL TO YOUR
27 ATTENTION SOME OF THE THINGS YOU SAID.

28 YOU LISTED A NUMBER OF DIFFERENT RELIGIONS.

1 YOU LISTED SUMMIT LIGHTHOUSE, WHICH IS THE FORERUNNER OF THE
2 CHURCH INVOLVED HERE NOW, CHURCH UNIVERSAL AND TRIUMPHANT.

3 BUT I NOTICE RIGHT IN THAT ARTICLE YOU LISTED
4 FLYING SAUCER GROUPS, MAIL ORDER CHURCHES, RITUAL MAGIC
5 CHURCHES, SATANISM AND WITCHCRAFT. AND YOU LISTED THEM
6 RIGHT ALONG WITH ALL THE MAIN LINE CHURCHES.

7 DO YOU REALLY EQUATE BLACK MAGIC CHURCHES AND
8 MAIL ORDER CHURCHES WITH THE METHODIST CHURCH?

9 A NO. AS I SAID, THIS ARTICLE HAS BEEN AN
10 EMBARRASSMENT TO ME EVER SINCE IT CAME OUT BECAUSE IT CAME
11 OUT UNDER MY NAME AND I DIDN'T WRITE IT.

12 THIS IS AN ARTICLE THAT WAS PLANTED BY THE
13 MARKETING PEOPLE WHO PUBLISHED MY ENCYCLOPEDIA. THEY CALLED
14 ME UP ONE DAY AND SAID THAT, "FOLKS AT GOOD HOUSEKEEPING
15 WANT TO EXCERPT SOME OF YOUR ENCYCLOPEDIA AND PRINT IT AS AN
16 ARTICLE. CAN WE DO THAT?"

17 I SAID, "FINE." WHEN IT CAME OUT, I WAS ONE OF
18 THE MOST SURPRISED PEOPLE IN THE WORLD. THE INTRODUCTORY
19 MATERIAL HERE WAS WRITTEN BY A P.R. PERSON EITHER AT THE
20 PUBLISHER OR WITH GOOD HOUSEKEEPING.

21 AND WHAT THEY EXCERPTED FROM THE ARTICLE WAS
22 THE TABLE OF CONTENTS OF MY ENCYCLOPEDIA. THEY DIDN'T
23 EXCERPT ANY OF THE CONTENT OF IT.

24 AND THE EMBARRASSING PART WAS THEY LEFT SOME
25 STUFF OUT AND I GOT ALL KINDS OF ANGRY LETTERS SAYING,
26 "WELL, THE REFORM CHURCH IN AMERICA IS ONE OF THE BIGGEST
27 CHURCHES IN THE COUNTRY. THEY ARE NOT LISTED. DON'T YOU
28 CONSIDER THEM A RELIGION? NO."

1 BUT IN FACT WHAT THIS IS IS THE ENCYCLOPEDIA.
2 AND WHAT WE TRY TO DO IN THE ENCYCLOPEDIA WAS TO BE VERY,
3 VERY COMPLETE OF ALL OF THE GROUPS WHO MET A BASIC CRITERIA.
4 WE HAD TWO QUESTIONS THAT WE HAD TO DEAL WITH.

5 ONE WAS IS IT A RELIGION OR NOT A RELIGION.
6 AND THAT WAS THE CRITERIA THAT I GAVE YOU EARLIER. IS IT A
7 RELIGION, DOES IT DEAL WITH THE RELIGIOUS QUESTIONS OF WHERE
8 DO WE COME FROM, WHERE ARE WE GOING, WHY ARE WE HERE?

9 SECONDLY, WAS IT A FULLY RELIGIOUS GROUP OR IS
10 IT A SPECIALIZED RELIGIOUS GROUP? FOR EXAMPLE, IF YOU LOOK
11 THROUGH HERE, THE BILLY GRAHAM EVANGELISTIC ASSOCIATION IS
12 NOT LISTED. WELL, THAT IS A RELIGIOUS GROUP.

13 Q EXCUSE ME, DOCTOR, I HATE TO INTERRUPT YOU. I
14 SEE YOU ARE ONLY PARTIALLY RESPONSIBLE FOR YOUR
15 CONTRIBUTION?

16 A RIGHT.

17 Q AND THEY JUST TOOK A PORTION OF THE TOTALITY OF
18 WHAT YOU WROTE?

19 A RIGHT.

20 Q THERE IS ONE GROUP IN THERE THAT I LIKE
21 ESPECIALLY AND THAT IS THE ONE THAT IS NAMED AFTER THE
22 COMEDIAN FLIP WILSON'S GROUP. WHAT IS THAT?

23 A CHURCH OF WHAT'S HAPPENING NOW. THAT IS A VERY
24 SERIOUS RELIGIOUS GROUP. THIS WAS FORMED BY A WOMAN IN
25 WASHINGTON, D.C., WHO IS A PENTECOSTAL MINISTER AND HAD NO
26 RELATION TO FLIP WILSON ACTUALLY. IT WAS FORMED PRIOR TO
27 HIS USING THAT NAME AND I SUSPECT HE DID IT IN IGNORANCE OF
28 IT.

1 BUT SHE WAS -- IT WAS A PENTECOSTAL SOCIAL
2 ACTION GROUP. AND SHE WANTED TO EMPHASIZE THE FACT THAT HER
3 CHURCH WAS INVOLVED IN SOCIAL ACTION IN WASHINGTON, D.C.,
4 AND THAT WAS THE NAME SHE HAPPENED TO CHOOSE FOR THE GROUP.
5 IT HAS FOUR OR FIVE CONGREGATIONS IN WASHINGTON. VERY
6 SERIOUS, VERY DEVOTED GROUP OF BLACK PENTECOSTALS.

7 Q SINCE THAT ARTICLE WAS SUCH AN EMBARRASSMENT TO
8 YOU AND SINCE THE GOOD HOUSEKEEPING MAGAZINE INCLUDED IT IN
9 THEIR PUBLICATION, WERE YOU OFFENDED ENOUGH TO SUE THEM OR
10 TO SEEK AN APOLOGY FROM THEM?

11 A NO.

12 Q DIDN'T DO ANYTHING ABOUT IT?

13 A NO. JUST LET IT DIE.

14 Q JUST LET IT DIE.

15 NOW, IN PREPARATION FOR YOUR TESTIMONY HERE,
16 YOU TOLD US YOU READ MR. MULL'S DEPOSITION, SOME OF THE
17 DEPOSITIONS OF MR. KING, DR. SINGER, RABBI ROBBINS, SOME OF
18 THE EXHIBITS, SOME OF THE EXCHANGE OF LETTERS AND A LOT OF
19 THE PUBLICATIONS OF THE CHURCH. I NOTE THAT YOU ONLY READ
20 ONE SIDE.

21 IS THERE ANY REASON THAT YOU DIDN'T MAKE AN
22 EXAMINATION AS TO THE DEPOSITION OF ELIZABETH CLARE PROPHET
23 OR THE TESTIMONY OF THE PEOPLE FROM THE CHURCH?

24 A NOT PARTICULARLY. I WAS ASKED TO READ CERTAIN
25 DEPOSITIONS BY MR. KLEIN WITH WHOM I WAS CONSULTING AND I
26 READ THOSE AT HIS REQUEST.

27 Q AS A PROFESSIONAL THOUGH, DON'T YOU THINK IT
28 MIGHT HAVE ENHANCED YOUR EXPERTISE IF YOU SAW BOTH SIDES OF

1 THE PICTURE?

2 A IT MIGHT HAVE. IN THE SENSE THAT I HAD ACCESS
3 TO LEADERS IN THE CHURCH, SO I WAS ABLE TO QUESTION THEM
4 DIRECTLY ABOUT QUESTIONS THAT HAD ARISEN IN THE -- MR. MULL
5 AND MR. KING'S DEPOSITION.

6 Q AS A CURIOUS RELIGIONIST, DID YOU THINK IT
7 MIGHT HAVE ENHANCED YOUR KNOWLEDGE HAD YOU REQUIRED A
8 MEETING WITH MR. MULL TO CHAT WITH HIM?

9 A AS A CURIOUS RELIGIONIST, YES. BUT OVERALL,
10 THE LENGTH OF HIS DEPOSITION AND HIS TESTIMONY SEEMED TO BE
11 QUITE SUFFICIENT. I DIDN'T HAVE ANY FURTHER QUESTIONS THAT
12 I WOULD HAVE PUT TO HIM.

13 Q YOU KNEW AT THE TIME OF HIS DEPOSITION, HE HAD
14 JUST BEEN RECOVERING FROM A STROKE-LIKE INCIDENT AND HE WAS
15 RECENTLY OUT OF THE HOSPITAL?

16 A YES.

17 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT
18 IS JUST A TESTIMONY BY COUNSEL.

19 THE COURT: HE CAN ANSWER.

20 THE WITNESS: YES.

21 THE COURT: THE ANSWER IS "YES"?

22 THE WITNESS: YES.

23 Q BY MR. LEVY: AND YOU COULD SEE BY THE DATES OF
24 THOSE DEPOSITIONS THAT THEY WERE NOT ALL ON ONE DAY, THEY
25 WERE OVER A PERIOD OF SEVERAL MONTHS?

26 A OH, YES.

27 Q DID YOU NOTE ANY IMPROVEMENT IN MR. MULL FROM
28 THE FIRST DEPOSITION TO THE SIXTH ONE?

1 A (NO AUDIBLE RESPONSE.)

2 Q LET ME WITHDRAW THAT SINCE YOU HAVE ALREADY
3 TOLD US YOU DON'T HAVE ANY MEDICAL DEGREES OR EXPERTISE IN
4 THAT AREA.

5 YOU TALKED ABOUT THE RECRUITMENT TECHNIQUES OF
6 THIS CHURCH AS BEING SLOW. LET ME GIVE YOU A LITTLE ANALOGY
7 AND SEE IF THAT MAYBE YOU MIGHT AGREE WITH ME.

8 WOULD IT BE FAIR TO SAY THAT RECRUITMENT
9 TECHNIQUES MIGHT BE OR MIGHT EQUATE WITH LIKE THE PLANTING
10 OF A SEED, AND A PERIOD OF TIME GOES BY WHERE YOU WATER THE
11 SEED AND YOU NURTURE THE SEED, AND EVENTUALLY THE SEED
12 SPRINGS INTO FULL BLOSSOM AND THEN PEOPLE HAVE THE
13 OPPORTUNITY FOR FULL PARTICIPATION?

14 MAYBE THAT IS A LITTLE MELODRAMATIC AND MAYBE A
15 LITTLE BIT FLOWERY, BUT WOULD THAT ANALOGY BE SOMEWHAT
16 CORRECT IN THE FACT THAT SLOWLY OVER A PERIOD OF TIME,
17 PEOPLE GET INVOLVED UNTIL THEY HAVE THE OPPORTUNITY TO MAKE
18 A FULL COMMITMENT, AND IT IS AFTER THE TIME THEY MAKE A FULL
19 COMMITMENT THAT THEY MIGHT GO ON PERMANENT STAFF AT CAMELOT?

20 MR. KLEIN: I AM GOING TO OBJECT. THAT IS A VERY
21 LONG AND COMPOUND QUESTION.

22 Q BY MR. LEVY: DO YOU UNDERSTAND IT, SIR?

23 A I SEEM TO. I AM THINKING ABOUT IT.

24 AS FAR AS IT GOES, IT DIDN'T PRESS THE ANALOGY
25 TOO MUCH FURTHER, AS FAR AS IT GOES, YES.

26 Q IN THE COURSE OF YOUR READING OF THE
27 DEPOSITIONS, DID YOU BECOME AWARE THAT MR. MULL WAS NOT
28 RECRUITED IN THAT FASHION?

1 A I REMEMBER THAT HE HAD BEEN A -- INVOLVED IN
2 OCCULT TEACHINGS OR IN METAPHYSICAL TEACHINGS FOR A GOOD
3 DEAL OF HIS LIFE. BUT RIGHT AT THIS POINT, I CAN'T REMEMBER
4 EXACTLY HOW HE WAS RECRUITED.

5 Q WOULD IT ALTER YOUR THEORY SOMEWHAT IF YOU
6 DISCOVERED THAT SPECIFIC PEOPLE CONTACTED HIM AND MADE HIM
7 AWARE OF THE TEACHINGS OF THIS CHURCH AS OPPOSED TO HIM
8 ANSWERING AN ADVERTISEMENT IN YOUR MAGAZINE?

9 A NO. I AM AWARE THAT SOME PEOPLE IN THE CHURCH
10 HAVE JOINED THROUGH PERSONAL CONTACT BEING THEIR FIRST --
11 FIRST CONTACT WITH THE CHURCH. BUT THAT IS -- THAT IS A
12 MINORITY SITUATION.

13 Q YOU HAVE TOLD US IN YOUR TESTIMONY THAT ALL
14 KIND OF PEOPLE SPEAK TO POWERS OUTSIDE AND BEYOND US MERE
15 MORTALS. I THINK MOST PEOPLE WILL RECOGNIZE THAT JESUS WAS
16 ONE OF THOSE VERY, VERY SPECIAL PEOPLE WHO MADE MENTION OF
17 CONTACTS THAT HE HAD WITH HIS FATHER WHO HE REFERRED TO AS
18 GOD.

19 WERE HE TO HAVE WRITTEN A LETTER WHICH
20 PURPORTED TO BE A COMMUNICATION FROM GOD, DO YOU THINK IT
21 WOULD HAVE BEEN SOMEWHAT PRESUMPTUOUS OF HIM TO HAVE SIGNED
22 THE LETTER WITH HIS FATHER'S NAME?

23 MR. KLEIN: I AM GOING TO OBJECT TO THAT QUESTION,
24 YOUR HONOR. IT IS VAGUE, AMBIGUOUS AND CALLS FOR
25 SPECULATION UNLESS COUNSEL HAPPENS TO HAVE THAT LETTER.

26 MR. LEVY: I JUST MIGHT.

27 THE COURT: SUSTAINED.

28 Q BY MR. LEVY: WELL, YOU HAVE BEEN SAVED FROM

1 ANSWERING THAT ONE SO LET ME ASK YOU ANOTHER ONE, SIR.

2 LET'S SAY THE SPIRITUAL LEADER OF THIS CHURCH,
3 THE ONE YOU'VE INVESTIGATED, CHURCH UNIVERSAL AND
4 TRIUMPHANT, WERE TO BE COMMUNICATING WITH SOMEONE IN HER
5 CHURCH AND A COMMUNICATION THAT SHE WAS GIVING TO THE OTHER
6 PERSON PURPORTED TO COME FROM ONE OF THOSE SPIRITUAL BEINGS
7 THAT SHE GETS MESSAGES FROM.

8 DO YOU THINK IT MIGHT HAVE BEEN PRESUMPTUOUS OF
9 HER IF SHE SIGNED THAT ASCENDED MASTER'S NAME INSTEAD OF HER
10 OWN?

11 A I -- I HAVE TWO ANSWERS FOR THAT.

12 Q I BET YOU DO.

13 A RIGHT. AS -- AND IF I MAY PUT ON MY METHODIST
14 MINISTER CAP FOR A MINUTE, THE ANSWER IS YES. IF I MAY --
15 AS A RELIGIOUS RESEARCHER, NOT PARTICULARLY -- I HAVE TONS
16 OF MATERIAL OF THAT KIND.

17 I HAD A VERY GOOD FRIEND IN BALTIMORE THAT I
18 KNEW, WHO, WHEN HER HUSBAND DIED, FROM THAT POINT UNTIL HER
19 OWN DEATH SEVERAL YEARS LATER, WOULD SIGN EVERY LETTER THAT
20 SHE WROTE WITH BOTH THE NAME OF HERSELF AND HER HUSBAND.
21 AND IT IS SOMETHING QUITE COMMON IN OCCULT RELIGIOUS
22 CIRCLES.

23 Q YOU KNOW, I HAVE READ THE OLD TESTAMENT, THE
24 NEW TESTAMENT, THE KORAN, THE BOOK OF MORMON. I HAVE READ
25 JUST ABOUT EVERY RELIGIOUS VOLUME THAT PURPORTS TO BE THE
26 TEACHINGS OF EVERY MAJOR RELIGION AND MOST OF THE MINOR
27 RELIGIONS.

28 AND TRY AS I MIGHT, I HAVE NEVER FOUND ANYWHERE

1 WHERE ANY OF THE SPOKESMEN FOR THE RELIGION HAD THE AUDACITY
2 TO SIGN THE NAME OF ALLAH, OR GOD, OR BUDDHA, OR JESUS OR
3 ANYONE ELSE.

4 A WELL, YOU MUST COME UP TO MY INSTITUTE SOME
5 TIME AND I WILL SHOW YOU A GOOD DEAL OF THAT KIND OF
6 LITERATURE.

7 Q LIKE WITH THE CHURCH OF WHAT'S HAPPENING NOW OR
8 THE FLYING SAUCERS OR THE BLACK MAGIC CHURCHES?

9 A SOME OF THE FLYING SAUCERS GROUPS, YES. THE
10 CHURCH OF WHAT'S HAPPENING NOW, NO.

11 MR. LEVY: ONE MINUTE IF I MAY, YOUR HONOR.

12 Q ONE FURTHER QUESTION.

13 A OKAY.

14 Q IF SOMEONE IN A POSITION OF APPARENT AUTHORITY,
15 LIKE A SPIRITUAL LEADER OF ONE OF THOSE GROUPS, WERE TO SEND
16 A LETTER OR GIVE A LETTER TO ONE OF THE FOLLOWERS AND SIGNED
17 THE NAME OF ONE OF THE ASCENDED MASTERS, DO YOU BELIEVE IT
18 IS POSSIBLE THAT THE DOING OF THAT MIGHT HAVE BEEN DONE FOR
19 MANIPULATIVE PURPOSES?

20 MR. KLEIN: I AM GOING TO OBJECT. THAT CALLS FOR
21 PURE SPECULATION, YOUR HONOR.

22 THE COURT: HE CAN ANSWER.

23 THE WITNESS: MIGHT HAVE, YES.

24 MR. LEVY: THANK YOU, DOCTOR.

25 I HAVE NOTHING FURTHER.

26 ///

27 ///

28 ///

1 REDIRECT EXAMINATION +

2 BY MR. KLEIN:

3 Q DOCTOR, THE LAST QUESTION THAT YOU WERE ASKED
4 ABOUT, DO YOU BELIEVE IT IS POSSIBLE THAT SIGNING THAT NAME
5 WOULD HAVE BEEN FOR MANIPULATIVE PURPOSES? IS IT JUST AS
6 POSSIBLE THAT IT WASN'T FOR MANIPULATIVE PURPOSES?

7 A I THINK OVERALL WHEN THAT HAPPENS, IT ISN'T FOR
8 MANIPULATIVE PURPOSES EXCEPT IN THE SENSE THAT ALL RELIGIOUS
9 TEACHERS ARE TRYING TO GET THEIR FOLLOWERS TO FOLLOW THE
10 TEACHINGS THAT THEY ARE HANDING OUT. SO IN A SENSE YOU ARE
11 ALWAYS TRYING TO MANIPULATE PEOPLE TO FOLLOW THE RELIGIOUS
12 TEACHINGS IN THAT VERY BROAD SENSE.

13 BUT I BELIEVE THE SENSE THAT WAS IMPLIED WAS IF
14 YOU SEND A PERSONAL LETTER AND YOU SIGN IT WITH THE NAME OF
15 AN ASCENDED MASTER, THAT YOU ARE TRYING TO GET A PERSON TO
16 DO SOMETHING VERY SPECIFIC. AS A WHOLE, WHEN I HAVE SEEN
17 THOSE KINDS OF COMMUNICATIONS, I DON'T BELIEVE THEY ARE
18 MANIPULATIVE.

19 Q DURING MR. LEVY'S CROSS-EXAMINATION, YOU SAID
20 THAT ALL RELIGIOUS LEADERS WANT TO MANIPULATE. DID YOU
21 INCLUDE IN THAT GROUP ONLY NEW AGE RELIGIONS OR DOES THAT
22 EXTEND TO WHAT WE CALL MAIN LINE RELIGIONS?

23 A NO. IT EXTENDS -- IT IS JUST A GENERAL ACROSS
24 THE BOARD THING. AS A PASTOR, I WAS PUT IN CHARGE OF A
25 CONGREGATION AND I HAD TO LEAD THAT CONGREGATION. SO I
26 PLANNED THE WORSHIP SERVICES AND I PLANNED THEM VERY
27 CAREFULLY TO PRODUCE CERTAIN EFFECTS. I ORDERED HOW THE
28 WORSHIP SERVICE WOULD TAKE PLACE, I SAW TO THE ATMOSPHERE OF

1 THE SANCTUARY.

2 THOSE ARE ALL -- IF ONE LOOKS AT THEM IN TERMS
3 OF A MECHANICAL TYPE OF UNIVERSE, THOSE ARE ALL MANIPULATING
4 THE ENVIRONMENT OF THE PEOPLE WHO WERE THERE. IT WAS VERY
5 LOW-GRADE MANIPULATION. IT IS NOT TWISTING ANYBODY'S ARM.
6 BUT IT HAS A HOPED FOR SUBTLE EFFECT OVER THE PEOPLE OVER A
7 PERIOD OF TIME.

8 Q ALSO IN RESPONSE TO A QUESTION BY MR. LEVY, YOU
9 SAID THAT THERE ARE SOME GROUPS DOING EITHER BRAINWASHING OR
10 TRYING TO GO THROUGH A -- TRYING TO THOROUGHLY INDOCTRINATE
11 THEIR MEMBERS.

12 IN YOUR OBSERVATIONS, IS CHURCH UNIVERSAL AND
13 TRIUMPHANT ONE OF THOSE GROUPS?

14 A IN THE UNITED STATES, MOST PEOPLE GROW UP IN --
15 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THE
16 QUESTION CALLS FOR A YES OR NO ANSWER.

17 THE COURT: SUSTAINED.

18 Q BY MR. KLEIN: CAN YOU ANSWER THAT YES OR NO
19 AND THEN I WILL ASK YOU ANOTHER QUESTION AFTER THAT.

20 A YES.

21 Q CAN YOU EXPLAIN?

22 A IN THE UNITED STATES, MOST PEOPLE ARE RAISED IN
23 A CHRISTIAN CHURCH. THEREFORE, IF THEY GO TO ANOTHER
24 CHRISTIAN CHURCH, THEY CAN CARRY A LOT OF MATERIAL WITH
25 THEM.

26 IF I AS A METHODIST DECIDE TO BECOME A
27 PRESBYTERIAN, 95 PERCENT OF WHAT I LEARNED AS A METHODIST
28 WOULD BE CARRIED OVER AND THERE WOULD NOT BE REQUIRED A LOT

1 OF NEW LEARNING. IN THE EXPERIENCE OF A LIFETIME, I HAVE
2 LEARNED PRETTY MUCH WHAT IT IS LIKE TO BE A PRESBYTERIAN BY
3 BEING A METHODIST.

4 IF I JOINED CHURCH UNIVERSAL AND TRIUMPHANT,
5 HOWEVER, I HAVE TO GO THROUGH A WHOLE REPROCESS OF LEARNING.
6 I HAVE TO UNLEARN EVERYTHING I HAVE LEARNED RELIGIOUS FROM
7 MY CHILDHOOD. I HAVE LEARNED A NEW SET OF HYMNS, A NEW SET
8 OF PRAYERS, A NEW WAY OF BEING RELIGIOUS.

9 AND IN ORDER TO DO THAT AND NOT TAKE ANOTHER 40
10 YEARS TO DO IT, I WOULD HAVE TO GO THROUGH A PRETTY STRONG
11 INDOCTRINATION PROCESS. BUT THAT IS VERY COMMON WHEN YOU
12 CONVERT.

13 IF A BUDDHIST CONVERTS TO CATHOLICISM, THEY GO
14 THROUGH THE SAME KIND OF STRONG INDOCTRINATION PROCESS TO
15 LEARN THAT NEW RELIGION. SO THAT IS BASICALLY WHAT WE ARE
16 TALKING ABOUT.

17 THE POINT BECOMES WITH A FEW GROUPS, AND THERE
18 ARE CERTAINLY A FEW GROUPS LIKE THIS, THE INDOCTRINATION
19 PROCESS GOES ALONG WITH A STRONG COMMITMENT TO THE GROUP
20 ITSELF. AN EXCLUSIVE COMMITMENT TO THE GROUP, NOT JUST A
21 PRIMARY COMMITMENT. AND THAT IS SOMEWHAT OBJECTIONABLE.

22 Q HAVE YOU FOUND THAT IN CHURCH UNIVERSAL AND
23 TRIUMPHANT?

24 A NO.

25 Q YOU SAID THAT YOU WENT TO CERTAIN CONFERENCES
26 OF CHURCH UNIVERSAL AND TRIUMPHANT AND MR. LEVY ASKED YOU
27 ABOUT PUTTING YOUR BEST FOOT FORWARD AT THE CONFERENCES.

28 MY QUESTION TO YOU IS IS WHAT YOU SAW AT THE

1 CONFERENCES THAT YOU WENT TO IN ANY WAY INCONSISTENT WITH
2 THE INFORMATION THAT YOU LEARNED THROUGH YOUR OWN
3 INTERVIEWS, YOUR LITERATURE THAT YOU READ AND WHATEVER OTHER
4 OBSERVATIONS YOU HAD CONCERNING CHURCH UNIVERSAL AND
5 TRIUMPHANT?

6 A NOT REALLY. THE -- I CAN REMEMBER ONE
7 CONFERENCE I WENT TO IN CHICAGO WHERE SOME OF THE BASIC
8 TEACHINGS WERE EXPLAINED. THE VISION OF WHAT WAS BEING
9 BUILT AT CAMELOT WAS DONE WITH A MULTIMEDIA PRESENTATION.
10 THERE WAS SOME DECREERING.

11 I REMEMBER THAT MY MAJOR OBSERVATION IN THE
12 EVENING IS THAT MOST OF THE PEOPLE IN THE AUDIENCE WERE
13 PEOPLE THAT I KNEW WHO WERE MEMBERS OF OTHER GROUPS. AND WE
14 GATHERED OUTSIDE AFTERWARDS TO DO A CRITIQUE OF THE EVENING
15 BASED UPON WHAT HAD HAPPENED WHEN OTHER SPIRITUAL TEACHERS
16 HAD PASSED THROUGH TOWN.

17 BECAUSE IN CHICAGO, WE WERE IN A UNIQUE
18 SITUATION IN THAT ALL THE SPIRITUAL TEACHERS WOULD COME TO
19 TOWN AND DO THIS. AND THERE WOULD BE THE SAME -- BASICALLY
20 THE SAME GROUP OF PEOPLE WOULD SHOW UP FOR EACH OF THESE
21 EVENTS. AND WE WOULD GET TOGETHER AFTERWARDS AND COMPARE
22 NOTES. AND IT WAS QUITE INTERESTING.

23 MR. KLEIN: YOUR HONOR, JUST ONE MOMENT, PLEASE.

24 Q IN YOUR STUDIES OF COMPARATIVE RELIGIONS, IS IT
25 UNUSUAL FOR A SPIRITUAL LEADER TO SAY THAT GOD IS TALKING
26 THROUGH THEM?

27 A WITH MOST OF THE SO-CALLED SPIRITUAL LEADERS IN
28 THE NEW AGE GROUPS, THEY WILL VARY. SOME WILL SAY THAT THEY

1 ARE PROPHET, THAT THEY SPEAK OUT OF INSPIRATION. OTHERS
2 WILL SAY THAT THEY ARE DIRECT MESSENGERS OF GOD. MORE THAN
3 ONE HALF OF THEM WILL SAY IN ONE FORM OR ANOTHER THEY
4 INCARNATE GOD, PARTICULARLY IF THEY ARE HINDU.

5 MR. KLEIN: THANK YOU.

6 I HAVE NOTHING FURTHER.

7 MR. LEVY: A FEW MORE, YOUR HONOR.

8
9 RECROSS-EXAMINATION +

10 BY MR. LEVY:

11 Q DOCTOR, YOUR SPECIALTY IS MORE RELIGION THAN
12 PSYCHOLOGY. LET ME ASK YOU A QUESTION THAT HAS A LITTLE BIT
13 TO DO WITH BOTH OF THEM.

14 SAY IN YOUR MINISTERIAL CAPACITY THERE IS SOME
15 LITTLE BIT OF DISAGREEMENT BETWEEN YOURSELF AND ONE OF YOUR
16 PARISHIONERS. I ASSUME SOMETIMES THAT YOU MIGHT EVEN QUOTE
17 FROM THE BIBLE WHEN YOU CHAT WITH THEM?

18 A OCCASIONALLY.

19 Q WHAT IF I WAS THE PARISHIONER, AND WE WERE
20 TALKING ABOUT DOLLARS, AND YOU IN THE MIDDLE OF THAT
21 DIALOGUE ABOUT A DISAGREEMENT OF DOLLARS WERE TO QUOTE TO ME
22 A NICE LITTLE STORY OF ANANIAS AND SAPPHIRA WHICH SAYS
23 ESSENTIALLY IF YOU LIE TO ME AND I DON'T GET ALL OF IT, YOU
24 ARE GOING TO DIE.

25 WOULD YOU CONSIDER THAT THAT MIGHT BE A
26 MANIPULATIVE TECHNIQUE ON YOUR PART IF YOU WERE TO SO USE
27 IT?

28 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO A

1 MISCHARACTERIZATION OF THE STORY THAT HE HAS GIVEN THEM AND
2 ALSO IMPROPER REDIRECT -- IMPROPER RECROSS.

3 THE COURT: OVERRULED. HE CAN ANSWER.

4 THE WITNESS: I MUST ADMIT I WOULD NEVER USE THAT
5 STORY IN THAT PARTICULAR SITUATION. THAT IS A STORY THAT
6 IF, YES, IF IT WERE USED IN THAT KIND OF SITUATION, I WOULD
7 CONSIDER IT MANIPULATIVE.

8 MR. LEVY: YOUR HONOR, THE DOCUMENT -- I WOULD ASK
9 THAT EXHIBIT NUMBER 3, WHICH IS THE ARTICLE IN GOOD
10 HOUSEKEEPING, BE ACCEPTED INTO EVIDENCE SINCE THE GOOD
11 DOCTOR TOLD US THAT MOST OF IT IS HIS WITH THE EXCEPTION --

12 THE COURT: WE HEARD WHAT HE SAID. IT IS NOT
13 NECESSARY FOR YOU TO --

14 MR. KLEIN: MAY I JUST HAVE A MOMENT TO LOOK AT THE
15 ARTICLE, YOUR HONOR? I HAVE NOT SEEN THAT.

16 THE COURT: IT'S RECEIVED.

17 (RECEIVED EVID: ^ EXHIBIT 3, GOOD
18 - - - - - ^ HOUSEKEEPING ARTICLE)

19 MR. LEVY: THANK YOU, YOUR HONOR.

20 THE COURT: ANYTHING ELSE WITH THIS WITNESS?

21 MR. KLEIN: JUST ONE MOMENT.

22 NO FURTHER QUESTIONS, YOUR HONOR.

23 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

24 THE COURT: OKAY. THANK YOU VERY MUCH. YOU ARE
25 EXCUSED.

26 THE WITNESS: YOUR HONOR, IF I MAY BE SO BOLD, MY
27 NEXT DOOR NEIGHBOR WAS AL MARGOLIS.

28 THE COURT: I AM FROM THE MIDWEST, BUT NOT CHICAGO.

1 JUST A COINCIDENCE?

2 THE WITNESS: I AM SURE.

3 THE COURT: OKAY. WE WILL TAKE OUR MORNING RECESS AT
4 THIS TIME.

5 (RECESS.)

6 THE COURT: PLEASE PROCEED.

7 MR. KLEIN: WE WOULD CALL ANTHONY NOTTOLI, YOUR
8 HONOR.

9
10 VICTOR ANTHONY NOTTOLI, +
11 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
12 TESTIFIES AS FOLLOWS:

13 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.
14 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL
15 YOUR FIRST AND LAST NAME.

16 THE WITNESS: VICTOR ANTHONY NOTTOLI. MY FIRST NAME
17 IS V-I-C-T-O-R.

18 THE CLERK: SLOWER.

19 THE WITNESS: SORRY. V-I-C-T-O-R. LAST NAME IS
20 NOTTOLI, N-O-T-T-O-L-I.

21 THE CLERK: MIDDLE NAME, ALSO.

22 THE WITNESS: ANTHONY, A-N-T-H-O-N-Y.

23 THE CLERK: THANK YOU.

24
25 DIRECT EXAMINATION +

26 BY MR. KLEIN:

27 Q ARE YOU CURRENTLY A CHURCH MEMBER?

28 A YES, I AM.

1 Q ARE YOU A STAFF MEMBER?

2 A NO, I AM NOT.

3 Q ARE YOU PRESENTLY EMPLOYED?

4 A YES, I AM.

5 Q WHAT DO YOU DO?

6 A MY WIFE AND I HAVE A BOARDING AND TRAINING
7 STABLE AT OUR HOUSE IN CHATSWORTH AND I HAVE A SHOP WHICH I
8 RUN.

9 Q WHAT KIND OF SHOP?

10 A IT IS A GARAGE. I AM A MECHANIC.

11 Q AN AUTOMOBILE MECHANIC?

12 A YEAH, AUTOMOBILE MECHANIC.

13 Q WE HAVE HEARD TESTIMONY FROM MRS. ANNE
14 COURTRIGHT. ARE YOU RELATED TO HER?

15 A YES. SHE IS MY MOTHER.

16 Q HOW OLD ARE YOU?

17 A I AM 23.

18 Q DO YOU KNOW MR. GREGORY MULL?

19 A YES, I DO.

20 Q DO YOU RECALL WHAT YEAR YOU FIRST MET HIM?

21 A IT WAS 1975 I BELIEVE.

22 Q SO YOU WOULD HAVE BEEN ABOUT 12 OR 13?

23 A I BELIEVE I MET HIM WHEN I WAS ABOUT -- YEAH,
24 ABOUT 12.

25 Q HOW DID IT COME ABOUT THAT YOU MET HIM?

26 A AT CHURCH.

27 Q CHURCH UNIVERSAL?

28 A CHURCH UNIVERSAL CAFETERIA.

1 Q WAS THAT AT SUMMIT UNIVERSITY?

2 A YES, IT WAS.

3 Q DID THERE COME A TIME WHEN YOU STAYED AT HIS
4 HOUSE IN SAN FRANCISCO, AT MR. MULL'S HOUSE FOR A PERIOD OF
5 TIME?

6 A YES, I DID.

7 Q WHEN WAS THAT? DO YOU RECALL APPROXIMATELY
8 WHAT YEAR?

9 A IT WAS -- IT WAS '76 I BELIEVE, 1976.

10 Q AND WHY WAS IT THAT YOU STAYED AT HIS HOUSE FOR
11 A PERIOD OF TIME?

12 A I HAD BEEN INVITED BY HIM TO LIVE UP THERE. I
13 WAS ATTENDING A CONFERENCE IN LOS ANGELES, CHURCH
14 CONFERENCE, AND HE INVITED ME TO LIVE UP THERE WITH HIM.

15 Q HAD YOU -- WHO HAD YOU BEEN LIVING WITH PRIOR
16 TO GOING UP THERE?

17 A WELL, I WAS LIVING WITH MY MOM AND MY ONE
18 BROTHER AND MY THREE SISTERS. WE WERE ALL LIVING IN OUR
19 HOUSE IN COLORADO SPRINGS AND I CAME OUT THERE TO A
20 CONFERENCE.

21 AND HE HAD CALLED MY MOM AND ASKED ME IF I, YOU
22 KNOW, SAID THAT HE WANTED ME TO COME UP THERE AND LIVE
23 THERE. AND MY MOM THOUGHT IT WAS A GOOD IDEA BECAUSE MY MOM
24 WAS DIVORCED AND SHE FELT THAT I NEEDED A FATHER FIGURE. SO
25 GREGORY CALLED HER AND SAID, "I WOULD LIKE TONY TO COME UP
26 AND LIVE WITH ME," AND ASKED ME --

27 MR. LEVY: EXCUSE ME, YOUR HONOR. AT THIS POINT I AM
28 GOING TO OBJECT. IT'S BECOMING A NARRATIVE.

1 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

2 Q BY MR. KLEIN: CALM DOWN AND JUST TRY TO ANSWER
3 THE QUESTION I ASK YOU.

4 A OKAY.

5 Q ALL RIGHT. WHEN YOU WERE IN SAN FRANCISCO
6 LIVING WITH MR. MULL, DID HE DO OR SAY ANYTHING THAT
7 INDICATED TO YOU WHAT HIS SEXUAL PREFERENCES WERE?

8 A YES, HE DID. WE HAD A CONVERSATION ABOUT IT
9 AND THERE WAS AN INCIDENT.

10 Q TELL US ABOUT THE CONVERSATION AS BEST AS YOU
11 CAN RECALL. WHERE DID IT OCCUR?

12 A WELL, IT OCCURRED IN HIS OFFICE BEDROOM. AND
13 WE WERE TALKING ABOUT HIS WIFE AND CHILDREN. AND HE SAID
14 THAT BEFORE HE HAD GOTTEN INTO THE TEACHINGS, SUMMIT
15 TEACHINGS, THAT HE HAD BEEN A HOMOSEXUAL. AND THAT SINCE HE
16 HAD BEEN IN THE TEACHINGS, THAT HE HAD BEEN CURED OF THAT.

17 Q WHEN HE USED THE WORD -- DID HE ACTUALLY USE
18 THE WORD "HOMOSEXUAL"?

19 A YES, HE DID.

20 Q DID YOU UNDERSTAND WHAT THAT MEANT?

21 A YES, I DID.

22 Q DID THERE COME A TIME WHEN YOU LEFT HIS HOUSE
23 IN SAN FRANCISCO?

24 A YEAH. YES. I LEFT THERE ABOUT THREE WEEKS
25 AFTERWARDS. I FELT A LITTLE UNCOMFORTABLE AFTER, YOU KNOW,
26 LEARNING -- LEARNING ABOUT THAT.

27 Q DURING THE YEARS THAT YOU'VE BEEN A CHURCH
28 MEMBER, HAVE YOU DECREED?

1 A YES, I HAVE.

2 Q DO YOU STILL DECREE?

3 A YES, I DO.

4 Q HAVE YOU EVER FELT THAT DECREERING LESSENERD YOUR
5 ABILITY TO CONTROL YOUR OWN THOUGHTS AND ACTIONS?

6 A NO.

7 Q WHAT EFFECT DOES DECREERING HAVE ON YOU?

8 A MAKES ME FEEL GOOD INSIDE, GOOD AS A PERSON.

9 IT IS A PRAYER TO ME. IT IS MY RELIGION.

10 MR. KLEIN: THANK YOU.

11 I HAVE NO FURTHER QUESTIONS.

12

13 CROSS-EXAMINATION +

14 BY MR. LEVY:

15 Q MR. NOTTOLI, YOU TOLD US YOU AND YOUR WIFE HAVE
16 SOME BOARDING AND TRAINING STABLES?

17 A YES.

18 Q HOW OLD ARE YOU NOW?

19 A TWENTY-THREE.

20 Q FAIRLY YOUNG MAN TO HAVE BOARDING STABLES AND
21 TRAINING STABLES. YOU HAVE HORSES, ALSO?

22 A YES, WE DO.

23 Q DID YOUR WIFE HAVE THOSE HORSES BEFORE YOU GOT
24 MARRIED?

25 A YES.

26 Q YOU ARE 23. HOW OLD IS YOUR WIFE?

27 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR, AS TO
28 RELEVANCE OF HOW OLD HIS WIFE IS.

1 THE COURT: HE CAN ANSWER.

2 THE WITNESS: PARDON ME?

3 THE COURT: YOU CAN ANSWER.

4 THE WITNESS: MY WIFE IS 42.

5 Q BY MR. LEVY: YOU ARE 23 AND SHE IS 42. IS
6 THIS THE LADY WHOSE HUSBAND DIVORCED HER WHEN HE CAUGHT YOU
7 WITH HER IN AN APARTMENT IN WOODLAND HILLS?

8 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
9 THE RELEVANCY OF THAT LINE OF QUESTIONING.

10 THE COURT: SUSTAINED.

11 Q BY MR. LEVY: DO YOU KNOW SEAN PROPHET?

12 A YES, I DO.

13 Q ARE YOU THE YOUNG MAN WHO USED TO SWIPE WINE
14 FROM THE CHURCH'S RESTAURANT, AND GO UP IN THE HILLS WITH
15 SEAN AND DRINK WINE WHILE YOU WERE AT CAMELOT?

16 A NO, I DON'T BELIEVE THAT SEAN AND I EVER SWIPED
17 WINE FROM ANY RESTAURANT AND GO UP IN THE HILLS AND DRINK
18 IT.

19 Q WHERE DID YOU DRINK IT?

20 A I DON'T RECALL SEAN AND I EVER DRINKING WINE
21 TOGETHER UP IN THE HILLS.

22 Q NOW, BACK IN 1976, YOU WERE MATURE FOR THE AGE
23 OF 13?

24 A I WAS 13. WHAT DO YOU MEAN BY "MATURE"?

25 Q A MAN OF THE WORLD, SOMEWHAT INTELLECTUAL, KNEW
26 PRETTY MUCH WHAT WAS GOING ON.

27 A NOT REALLY. I WAS JUST -- I WASN'T A MAN OF
28 THE WORLD.

1 Q NOW, HOW OLD WAS MR. MULL WHEN YOU STAYED AT
2 HIS HOME WHILE YOU ATTENDED A CONFERENCE?

3 A I DON'T RECALL NOW WHAT WAS MR. MULL'S AGE.

4 Q WAS HE OLDER THAN YOU WHEN YOU STAYED THERE?

5 A YES, HE WAS.

6 Q WAS HE AROUND 50 YEARS OF AGE?

7 A I -- I THINK ABOUT 50, YEAH. 45 OR 50 OR SO.

8 Q SOMETHING LIKE THAT. WHILE YOU WERE STAYING
9 THERE, WERE THERE ANY OTHER PEOPLE CONNECTED WITH THE CHURCH
10 THAT WERE STAYING THERE ALSO AND ATTENDING THE CONFERENCE?

11 A AT HIS -- WELL, AT HIS HOUSE, AT HIS HOUSE YOU
12 MEAN?

13 Q YES, SIR.

14 A NO. AT HIS HOUSE, IT WAS JUST ME AND GREGORY
15 AND HIS DAUGHTER LINDA.

16 Q NO ONE ELSE STAYED IN HIS HOME DURING THAT
17 PERIOD OF TIME WHEN YOU WERE ATTENDING THE CONFERENCE?

18 A WELL, SIR, WE DIDN'T ATTEND THE CONFERENCE IN
19 SAN FRANCISCO. THE CONFERENCE WAS IN LOS ANGELES. IT WAS
20 AFTER THE CONFERENCE I WENT TO LIVE WITH HIM.

21 Q AFTER THE CONFERENCE, YOU WENT TO STAY WITH HIM
22 AND HIS DAUGHTER?

23 A UH-HUH.

24 Q NOW, YOU HAVE TOLD US THAT THIS 45 TO 50 YEAR
25 OLD GENTLEMAN DECIDED TO CONFESS TO YOU HIS SEXUAL PAST?

26 A I WOULDN'T CALL IT A CONFESSION. IT WAS A
27 CONVERSATION THAT WE HAD HAD.

28 Q HE WAS 50, AND YOU WERE 13 AND HE WAS

1 DISCUSSING SEXUALITY WITH YOU?

2 A WELL, HE WAS DISCUSSING HIS SEXUALITY WITH ME,
3 YES.

4 Q AND OF COURSE YOUR AWARENESS OF SEXUALITY AND
5 MORALITY AND HUMAN BEHAVIOR WAS SUCH THAT YOU WERE A FULL
6 PARTICIPANT IN THAT CONVERSATION?

7 A WELL, I WAS HARDLY A PARTICIPANT. BUT I GUESS
8 HE CHOSE TO CONFIDE IN ME SOMETHING THAT MEANT SOMETHING TO
9 HIM.

10 Q DO YOU FOLLOW THE TEACHINGS OF THE CHURCH?

11 A YES, I DO.

12 Q ISN'T IT ONE OF THE DICTATES OF THE CHURCH THAT
13 AS A MEMBER OF THE CHURCH, YOU DO NOT DISCUSS OTHER PEOPLE'S
14 SEXUALITY OR YOUR OWN?

15 A I -- I DON'T BELIEVE THAT'S EVER BEEN A DICTATE
16 AS FAR AS I -- I HAVE NOT BEEN TOLD.

17 Q DID YOU EVER ATTEND SUMMIT UNIVERSITY?

18 A NO, I DIDN'T.

19 Q YOU JUST KIND OF GREW UP AT THE CHURCH MORE OR
20 LESS?

21 A I GREW UP IN THE CHURCH AND I WENT TO
22 MONTESSORI SCHOOL THERE.

23 Q I KNOW COLORS ARE IMPORTANT TO THE CHURCH. I
24 NOTICE YOU ARE WEARING A PINK SHIRT. YOU ARE NOT A
25 HOMOSEXUAL BY ANY CHANCE ARE YOU, MR. NOTTOLI?

26 A NO, I AM NOT. I HAVE ALWAYS PREFERRED THE
27 COLOR PINK.

28 Q AND PINK SHIRTS?

1 A AND PINK SHIRTS. I HAPPEN TO LIKE PINK SHIRTS.

2 Q DO ANY OTHER 50 YEAR OLD MEN CONFESS TO YOU
3 THEIR SEXUAL PROCLIVITIES?

4 A NO, I DON'T RECALL ANY OTHERS.

5 Q JUST GREGORY OUT OF THE BLUE ONE DAY DECIDED TO
6 TELL YOU ABOUT HIS SEXUAL PAST?

7 A WELL, IT WAS -- I WAS LIVING AT HIS HOUSE, AND
8 HE HAD, I GUESS, THOUGHT THAT, YOU KNOW, IT WAS HIS JOB TO
9 BE A FATHER FIGURE TO ME AND I GUESS PART OF WHAT HE THOUGHT
10 WAS BEING A FATHER FIGURE TO ME WOULD BE TO TELL ME WHAT HE
11 FELT ABOUT HIS PAST. I DON'T KNOW.

12 Q YOU DON'T KNOW? DID HE EVER TALK TO YOU ABOUT
13 BASEBALL?

14 A NO, HE NEVER TALKED TO ME ABOUT BASEBALL.

15 Q WHAT ABOUT ARCHITECTURE?

16 A YES, HE DID SHOW ME A LITTLE BIT ABOUT
17 ARCHITECTURE.

18 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

19 MR. KLEIN: NOTHING FURTHER, YOUR HONOR.

20 THE COURT: YOU ARE EXCUSED.

21 CALL YOUR NEXT WITNESS.

22 MR. KLEIN: SUSAN HARROW, YOUR HONOR.

23

24 SUSAN HARROW, +

25 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
26 TESTIFIES AS FOLLOWS:

27 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.

28 PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR

1 NAME.

2 THE WITNESS: SUSAN HARROW, H-A-R-R-O-W.

3 THE CLERK: AND YOUR FIRST NAME, ALSO.

4 THE WITNESS: SUSAN, S-U-S-A-N.

5 THE CLERK: THANK YOU.

6 THE COURT: PROCEED.

7 MR. KLEIN: THANK YOU, YOUR HONOR.

8

9 DIRECT EXAMINATION +

10 BY MR. KLEIN:

11 Q ARE YOU CURRENTLY A STAFF MEMBER AT CHURCH
12 UNIVERSAL AND TRIUMPHANT?

13 A YES, I AM.

14 Q HOW LONG HAVE YOU BEEN A MEMBER OF THE STAFF?

15 A SEVEN YEARS NOW.

16 Q WHEN DID YOU ACTUALLY JOIN? DO YOU RECALL WHAT
17 YEAR THAT WAS?

18 A IT WAS -- ACTUALLY IT WAS IN MARCH OF '79. SO
19 IT'S BEEN JUST SEVEN YEARS.

20 Q WHEN YOU JOINED THE STAFF IN MARCH OF 1979,
21 WHAT JOB DID YOU HAVE?

22 A MY FIRST ASSIGNMENT WAS TO BE THE SECRETARY IN
23 THE KITCHEN.

24 Q WHAT WERE YOUR DUTIES AS THE SECRETARY IN THE
25 KITCHEN?

26 A WELL, I DID QUITE A FEW THINGS. I ANSWERED THE
27 TELEPHONE, TOOK MESSAGES AND ASSISTED THE SUPERVISOR TO THE
28 KITCHEN. I ALSO STARTED A RECORD KEEPING SYSTEM AND

1 RECORDED, FOR INSTANCE, THE MEALS THAT WERE SERVED AND OUR
2 PROCEDURES FOR PREPARING THEM.

3 Q WITH RESPECT TO RECORDING THE MEALS THAT WERE
4 SERVED, DID YOU DO IT FOR BREAKFAST, LUNCH AND DINNER?

5 A ACTUALLY, I DID IT MAINLY FOR THE LUNCH AND
6 DINNER MEALS. THE BREAKFAST WAS A STANDARD MEAL.

7 Q WHAT WAS THE PROCEDURE THAT YOU USED TO RECORD
8 THE LUNCH AND DINNER MEALS?

9 A WELL, THERE WAS WHAT WE CALLED AN ASSIGNMENT
10 FORM THAT WAS PREPARED BY THE KITCHEN SUPERVISOR WHICH WOULD
11 LIST WHAT WE WERE SERVING THAT DAY AND THE PERSONNEL IN THE
12 KITCHEN THAT WOULD BE RESPONSIBLE FOR PREPARING EACH PART OF
13 IT.

14 SO I WOULD TAKE THAT FORM AT THE END OF THE DAY
15 AND RECORD -- I RECORDED IT LIKE IN A CALENDAR KIND OF BOOK
16 ON A DAILY BASIS, YOU KNOW, WHAT WE HAD FOR LUNCH, WHAT WE
17 HAD FOR DINNER.

18 Q NOW, LET'S SAY ON A PARTICULAR DAY THERE HAD
19 BEEN A LAST MINUTE CHANGE IN THE MENU. WOULD YOU BE ABLE TO
20 RECORD THAT IN THE RECORDS YOU WERE KEEPING?

21 A WELL, YES, BECAUSE THE ASSIGNMENTS WERE JUST
22 MADE ON A DAILY BASIS FOR EACH MEAL. IN OTHER WORDS, IN THE
23 MORNING, THE SUPERVISOR WOULD MAKE UP THE ASSIGNMENT SHEET
24 JUST FOR THAT LUNCH MEAL AND THE SAME FOR THE DINNER.

25 SO IF THERE WAS A CHANGE, IF SOMETHING HAD TO
26 BE ALTERED, IT WOULD BE NOTED AT THAT TIME BECAUSE THEY WERE
27 RESPONSIBLE TO SEE EXACTLY WHAT WENT ON THE LINE, ON THE
28 SERVING LINE FOR THAT MEAL.

1 Q WOULD THE ASSIGNMENT SHEET REFLECT WHO WAS
2 ASSIGNED TO PREPARE A PARTICULAR PART OF THE MEAL?

3 A RIGHT.

4 Q NOW, DURING THE TIME THAT YOU WERE KEEPING
5 THESE RECORDS OF WHAT WAS BEING SERVED AT LUNCH AND DINNER,
6 WERE YOU EATING LUNCH AND DINNER AT CAMELOT?

7 A YES, I WAS.

8 Q TO YOUR KNOWLEDGE, DID THOSE ASSIGNMENT SHEETS
9 ACCURATELY REFLECT WHAT WAS ACTUALLY BEING SERVED IN THE
10 CAFETERIA AT LUNCH AND DINNER?

11 A YES, THEY DID.

12 Q WAS THERE ANY OCCASION DURING 1979 AND 1980
13 WHEN THE ASSIGNMENT SHEET DID NOT ACCURATELY REFLECT WHAT
14 YOU HAD ACTUALLY EATEN OR SEEN BEING SERVED IN THE
15 CAFETERIA?

16 A NOT TO MY KNOWLEDGE.

17 Q WHEN WOULD YOU WRITE DOWN THE INFORMATION IN
18 THOSE CALENDAR LOGBOOKS AS FAR AS WHAT WAS BEING SERVED FOR
19 A PARTICULAR DAY?

20 A WELL, IT WOULD EITHER BE DONE THAT DAY OR THE
21 DAY AFTER.

22 Q FOR WHAT PERIOD OF TIME DID YOU PERSONALLY
23 WRITE THE INFORMATION IN THE LOGBOOKS?

24 A I -- I STARTED DOING IT ACTUALLY RIGHT WHEN I
25 STARTED MY SERVICE IN '79 AND I BELIEVE I STOPPED DOING IT
26 PERSONALLY MYSELF IN 1981.

27 Q NOW, YOU SAID YOU CAME IN MARCH OF 1979. DO
28 YOU KNOW IF THERE WAS A RECORDING OF WHAT WAS BEING SERVED

1 FOR LUNCH AND DINNER FOR THE MONTHS OF JANUARY AND FEBRUARY
2 OF '79?

3 A YES. THAT WAS RECORDED.

4 Q HOW DO YOU KNOW THAT?

5 A WELL, WHEN THE CALENDAR BOOK WAS PASSED ON TO
6 ME AS AN ASSIGNMENT, THOSE TWO MONTHS HAD ALREADY BEEN
7 FILLED IN.

8 Q DO YOU KNOW WHO IT WAS THAT RECORDED THE
9 INFORMATION FOR THE MONTHS OF JANUARY AND FEBRUARY?

10 A THERE WERE TWO DIFFERENT PEOPLE ACTUALLY. ONE
11 WAS THE KITCHEN SUPERVISOR HERSELF, WHOSE NAME WAS MARY
12 BRUCKNER. AND THEN THERE WAS ANOTHER KITCHEN ASSISTANT
13 NAMED CATHERINE NICHOLS WHO HAD ALSO WRITTEN IN THE BOOK.

14 Q HOW DO YOU KNOW THAT THOSE PEOPLE HAD BEEN THE
15 ONES THAT WROTE IN THE LOGBOOK FOR THE MONTHS OF JANUARY AND
16 FEBRUARY OF '79?

17 A WELL, MARY, AS MY SUPERVISOR, ACTUALLY TRAINED
18 ME IN HOW TO DO THE RECORDING, AND EXPLAINED TO ME WHAT SHE
19 HAD DONE AND WHAT CATHERINE HAD DONE IN THE MONTHS
20 PRECEEDING.

21 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK THAT
22 THE LOGBOOK FOR 1979 BE MARKED NUMBER 116 FOR IDENTIFICATION
23 AND THE LOGBOOK FOR 1980 BE MARKED NUMBER 117 FOR
24 IDENTIFICATION.

25 THE COURT: SO MARKED FOR IDENTIFICATION.

26 (MARKED FOR ID: ^ EXHIBIT 116, 1979 LOGBOOK

27 - - - - - ^ EXHIBIT 117, 1980 LOGBOOK)

28 Q BY MR. KLEIN: PLEASE TAKE A LOOK AT WHAT HAS

1 BEEN MARKED NUMBERS 116 AND 117 FOR IDENTIFICATION AND TELL
2 ME IF YOU RECOGNIZE THOSE BOOKLETS?

3 A YES, I DO. THESE ARE THE BOOKS I RECORDED IN.

4 Q WERE THESE RECORDS WHERE YOU RECORDED THE LUNCH
5 AND DINNER MEALS KEPT IN THE REGULAR COURSE OF RUNNING THE
6 KITCHEN?

7 A YES.

8 Q HOW MUCH TIME WOULD TYPICALLY ELAPSE FROM A
9 MEAL TO THE TIME THAT YOU WOULD WRITE THE ENTRY IN THE LOG?

10 A WELL, I WOULD SAY AT THE MOST TWO TO THREE
11 DAYS.

12 Q AND WHEN WOULD THE ASSIGNMENT SHEETS FROM WHICH
13 YOU COPIED THE INFORMATION, WHEN WERE THOSE PREPARED?

14 A THEY WERE PREPARED ON A DAILY BASIS, THEN I
15 WOULD COLLECT THEM AT THE END OF THE DAY.

16 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK THAT
17 NUMBERS 116 AND 117 FOR IDENTIFICATION BE RECEIVED IN
18 EVIDENCE.

19 MR. LEVY: MAY I INQUIRE, YOUR HONOR?

20 THE COURT: ALL RIGHT.

21 MR. LEVY: IS MR. KLEIN OFFERING IN THE ORIGINALS
22 INTO EVIDENCE?

23 THE COURT: HOW ABOUT IT?

24 MR. KLEIN: IT IS MY UNDERSTANDING. I WILL ASK THE
25 WITNESS.

26 Q ARE THOSE THE ORIGINAL LOGBOOKS WHERE YOU MADE
27 THE ENTRIES?

28 A YES, THEY ARE.

1 MR. LEVY: WE HAVE NO OBJECTION TO THE ENTRY OF THE
2 ORIGINALS INTO EVIDENCE, YOUR HONOR.

3 THE COURT: ALL RIGHT. 116 AND 117 ARE RECEIVED.

4 (RECEIVED EVID: ^ EXHIBITS 116 AND 117)

5 Q BY MR. KLEIN: IN THOSE LOGBOOKS, ARE THERE ANY
6 DAYS WHERE NOTHING IS RECORDED?

7 A THERE PROBABLY ARE A FEW DAYS.

8 Q AND WHY WOULD THERE BE A DAY OR TWO OR THREE
9 WHERE NOTHING IS RECORDED?

10 A WELL, THERE COULD BE A COUPLE OF REASONS.
11 THERE PROBABLY WOULD BE A TIME OR TWO WHERE I DIDN'T GET THE
12 ASSIGNMENT SHEETS COLLECTED OR THEY GOT TOSSED AWAY. I WAS
13 ILL AND NO ONE ELSE DID THE JOB.

14 THE OTHER THING WAS THAT WHEN WE HAD A SPECIAL
15 EVENT OR A BIG MEAL LIKE A THANKSGIVING MEAL OR SOMETHING
16 LIKE THAT, WE WOULD RECORD IT SEPARATELY BECAUSE WE WOULD
17 KEEP A FILE ON THE PREPARATIONS FOR THAT KIND OF A MEAL.

18 Q WERE THERE ANY DAYS DURING 1979 THROUGH 1980,
19 WHILE YOU WERE WORKING AS A SECRETARY IN THE KITCHEN, WHERE
20 THE KITCHEN DID NOT SERVE ANY FOOD?

21 A NO, THERE WEREN'T.

22 Q DO YOU KNOW WHY THESE RECORDS WERE KEPT?

23 A WELL, THEY WERE PRIMARILY KEPT FOR FUTURE
24 PLANNING. IN OTHER WORDS, THE SUPERVISOR AND THE FLOOR
25 MANAGER WOULD GO BACK TO THEM AND PLAN THEIR NEXT SET OF
26 MENUS BASED ON WHAT HAD BEEN DONE BEFORE, GET IDEAS, SEE
27 WHAT KIND OF THINGS WERE PLANNED. IT WAS JUST A ROUTINE
28 FUNCTION TO ASSIST THEM IN THE FUTURE.

1 Q I WOULD LIKE YOU TO DIRECT YOUR ATTENTION TO
2 THE WEEK OF SEPTEMBER 2ND, 1979. WHY DON'T YOU TAKE A LOOK
3 AT THOSE MENUS FOR A MOMENT ON THAT WEEK.

4 IS THAT A TYPICAL WEEK FOR THE YEARS 1979 TO
5 1980?

6 A YEAH. I THINK IT LOOKS PRETTY TYPICAL.

7 Q CAN YOU READ FOR US WHAT THE -- FOR THE -- FOR
8 THAT WEEK, THE ENTIRE WEEK, THE BREAKFAST MENU WAS AND WHAT
9 THE DINNER MENU WAS?

10 A BREAKFAST AND DINNER?

11 Q I AM SORRY. LUNCH MENU AND DINNER MENU.

12 A OKAY. ON SUNDAY, WHERE WE HAD BAKED FISH FOR
13 LUNCH WITH CHARRED OVEN ROASTED POTATOES, CAULIFLOWER WITH
14 CHEESE SAUCE, RICE AND SALAD. AND THEN DINNER THAT DAY WAS
15 PANCAKES WITH STRAWBERRY SYRUP.

16 Q DOES THAT SAY RICE PANCAKES?

17 A YES, ACTUALLY. THEY ARE MADE WITH A RICE
18 FLOUR.

19 MONDAY LUNCH WAS MINESTRONE SOUP, CAESAR SALAD,
20 BREAD STICKS, RICE AND CAMELOT CORN, WHICH WOULD HAVE MEANT
21 CORN FROM OUR GARDEN. DINNER WAS SWISS CHEESE SOUFFLE,
22 HERBED RICE AND BRUSSELS SPROUTS.

23 TUESDAY LUNCH MILLET BURGERS --

24 Q WHAT IS MILLET BURGERS?

25 A IT IS LIKE A VEGETARIAN BURGER. IT IS MADE
26 WITH COOKED MILLET, SAUTEED VEGETABLES, SEASONINGS AND THEN
27 IT IS PUT ON A -- LIKE A HAMBURGER BUN SERVED WITH BARBECUE
28 SAUCE, LETTUCE AND PICKLES. THAT WENT WITH CORN ON THE COB

1 AND A SPINACH OLIVE SALAD. DINNER WAS CABBAGE ROLLS WITH
2 RICE, GREEN BEANS AND SQUASH.

3 WEDNESDAY LUNCH WAS CHICKEN SOUP SERVED WITH
4 CREAMED ASPARAGUS ON TOAST, RICE AND CARROTS. AND DINNER
5 WAS TOFU FILLETS IN BROWN GRAVY WITH RICE AND BROCCOLI.

6 ON THURSDAY WE HAD A HARDY CURRIED SOUP, SAN
7 JUAN SALAD, RICE MUFFINS, RICE AND ZUCCHINI AND TOMATOES.
8 DINNER WAS MRS. M'S EGGPLANT CASSEROLE, MILLET AND CARROTS.

9 AND FRIDAY LUNCH WAS WE SERVED LEFTOVER SOUPS
10 FROM THE WEEK, BUDDHIST DELIGHT, WHICH IS A CHINESE
11 VEGETABLE DISH, CHINESE NOODLES, YELLOW SQUASH AND RICE.
12 DINNER WAS SOY LOAF, GRAVY, PEAS AND RICE.

13 AND ON SATURDAY LUNCH WAS A GARDEN VEGETABLE
14 SOUP WITH TOSTADAS, RICE AND SPINACH. SATURDAY NIGHT WE
15 NORMALLY SERVED LEFTOVERS, SO WE'D TAKE LEFTOVERS FROM THE
16 WEEK AND SERVE THEM AGAIN.

17 Q NOW, IS THE FOOD LISTED IN THE LOG WHICH YOU'VE
18 JUST READ AS TO THAT WEEK, FOR ANY PARTICULAR MEAL, WAS THAT
19 THE ONLY FOOD THAT WOULD BE AVAILABLE?

20 A WELL, NO. ACTUALLY THESE ARE JUST THE HOT FOOD
21 MEALS THAT WE WOULD PUT ON THE CAFETERIA LINE. WE ALWAYS
22 HAD A LARGE SALAD BAR AVAILABLE. YOU KNOW, WE HAVE THINGS
23 LIKE NUTS AND SEEDS, SEaweeds, AVOCADOS, SPROUTS, LETTUCE,
24 ALL KINDS OF VEGETABLES. THAT WOULD BE OUT.

25 LUNCH AND DINNER WE WOULD ALSO HAVE A FRUIT BAR
26 OUT WITH YOGURT. AND OF COURSE WE HAVE OUR BEVERAGES,
27 COFFEE, HERB TEAS, MILK. AND WE ALSO HAVE A CONDIMENT LINE
28 WHERE WE HAVE LIKE DIETARY SUPPLEMENTS, WHEAT GERM, BRAN,

1 CAROB POWDER, VEGETABLE BROTH, THINGS ALONG THAT LINE.

2 Q NOW, IF SOMEBODY HAD A PARTICULAR DIETARY NEED
3 AND IT WASN'T MET BY ALL THE THINGS THAT YOU'VE EITHER READ
4 FROM THE LOG OR JUST LISTED RIGHT NOW, WAS THERE ANY OTHER
5 FOOD AVAILABLE?

6 A WELL, ACTUALLY WE HAD WHAT WAS CALLED A SPECIAL
7 REQUEST DEPARTMENT. AND IF SOMEBODY NEEDED SOMETHING ASIDE
8 FROM WHAT WAS OUT, THEY COULD COME TO THE TABLE AND SOMEONE
9 WOULD TRY TO HELP THEM. WE'D PROVIDE THINGS LIKE SLICED
10 CHEESE, TUNA FISH, CHICKEN, ESPECIALLY FOR PEOPLE THAT WOULD
11 HAVE THAT KIND OF A NEED.

12 Q ONE THING I NOTICE, ON SOME OF THESE PAGES
13 THERE IS SOMETHING CALLED A TIDY JOSEPH. WHAT IS THAT?

14 A WELL, A TIDY JOSEPH IS A VEGETARIAN VERSION OF
15 A SLOPPY JOE. IT IS MADE WITH A VEGETABLE PROTEIN PRODUCT.
16 IT IS ACTUALLY MADE FROM SOY AND VEGETABLES, AND IT IS
17 SAUTEED JUST LIKE YOUR HAMBURGER, AND MIXED WITH THE TOMATO
18 AND RICE AND YOU PUT IT OVER A BUN WITH GRATED CHEESE.

19 Q DURING THE YEARS YOU'VE LIVED AT CAMELOT, WHAT
20 EFFECT, IF ANY, HAS LIVING THERE HAD ON YOUR LIFE?

21 A WELL, I -- I THINK IT'S HAD A VERY POSITIVE
22 EFFECT. THAT IS WHY I AM STILL THERE. IT'S -- IT IS THE
23 KIND OF COMMUNITY AND LIFESTYLE THAT I WAS LOOKING FOR.

24 Q DO YOU DECREE?

25 A YES, I DO.

26 Q WHAT EFFECT, IF ANY, DOES DECREEEING HAVE ON
27 YOU?

28 A WELL, ONCE AGAIN, I FEEL THAT IT HAS A POSITIVE

1 EFFECT. TO ME IT SEEMS TO MAKE A DIFFERENCE IN MY -- LIKE
2 MY POWERS OF CONCENTRATION AND BEING ABLE TO FOCUS ON MY
3 WORK, LEARN MORE ABOUT WHAT I AM DOING.

4 AND IT IS ALSO JUST FROM A SPIRITUAL ASPECT AN
5 OPPORTUNITY TO -- TO DO WHAT WE FEEL IS A FORM OF PRAYER IN
6 WHICH WE ARE ACTUALLY HELPING THE PLANET, SENDING OUT A GOOD
7 VIBRATION YOU COULD CALL IT.

8 Q DURING THE YEARS YOU HAVE BEEN A STAFF MEMBER,
9 HAVE YOU EVER BELIEVED THAT YOU WERE BEING MANIPULATED OR
10 CONTROLLED IN ANY WAY?

11 A NO, I HAVEN'T.

12 MR. KLEIN: THANK YOU.

13 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

14 MR. LEVY: THANK YOU, YOUR HONOR.

15
16 CROSS-EXAMINATION +

17 BY MR. LEVY:

18 Q MAY I TAKE A PEEK INTO THIS THING?

19 YOU STARTED ON THE 2ND OF -- THE 2ND OF
20 SEPTEMBER. IN LOOKING AT THAT LITTLE COLUMN ABOUT THE 2ND
21 OF SEPTEMBER, YOU READ OFF THAT LIST TO US AND YOU READ
22 EVERY SINGLE WORD IN THERE EXCEPT ONE.

23 WHEN YOU WERE DESCRIBING WHAT WAS ON THAT LIST,
24 MISS HARROW, YOU TALKED ABOUT BAKED FISH, AND CHARRED AND
25 OVEN ROASTED POTATOES, AND CAULIFLOWER, AND RICE WITH CHEESE
26 SAUCE, RICE PANCAKES AND STRAWBERRY SYRUP. THE ONLY WORD
27 YOU LEFT OUT WAS THE ONE THAT PRECEDED THE SALAD.

28 YOU WANT TO TELL US WHAT WORD YOU LEFT OUT?

1 A WELL, I DID LEAVE A WORD OUT ACTUALLY, YOU ARE
2 CORRECT. THE SALAD THAT DAY WAS CALLED MOTHER SALAD.

3 Q MOTHER SALAD. AND WHAT IS MOTHER SALAD?

4 A IT IS A SPECIFIC RECIPE WE HAVE FOR A TOSSED
5 GREEN SALAD WITH LOTS OF VEGETABLES AND AN OIL AND VINEGAR
6 DRESSING.

7 Q DID YOU ATTEND SUMMIT UNIVERSITY?

8 A YES, I DID.

9 Q WHEN DID YOU ATTEND SUMMIT UNIVERSITY?

10 A FROM JANUARY OF '79 UNTIL -- UNTIL MARCH.

11 Q DID YOU ATTEND SUMMIT UNIVERSITY IN 1975 ALONG
12 WITH MR. MULL?

13 A '75? NO, I DIDN'T.

14 Q DO YOU HAVE ANY IDEA WHAT WAS FED TO THE
15 STUDENTS THEN OR WHAT WAS NOT FED TO THE STUDENTS THEN?

16 A I REALLY DON'T.

17 Q YOU SAID ALL OF THESE BLANK PAGES THAT ARE IN
18 HERE ARE BECAUSE SOMEBODY NEGLECTED TO CONVEY TO YOU, OR YOU
19 OVERLOOKED, OR SOMETHING ELSE HAPPENED OR THEY JUST ENDED UP
20 BLANK?

21 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT. SHE
22 DIDN'T SAY ANYTHING ABOUT ALL OF THESE BLANK PAGES.

23 THE COURT: REPHRASE IT.

24 Q BY MR. LEVY: THE DAYS WHERE THERE IS NOTHING
25 WRITTEN IN HERE, WOULD YOU TELL US WHY ON THOSE DAYS THERE
26 IS NOTHING WRITTEN IN HERE AGAIN?

27 A WELL, THERE PROBABLY ARE A FEW DAYS WHEN
28 NOTHING IS WRITTEN. AS I SAID, EITHER IT WAS A SPECIAL

1 EVENT OR A CONFERENCE OR A SPECIAL MEAL WHERE WE WOULD HAVE
2 A SEPARATE FILE ON THAT. OR THERE PROBABLY ARE A FEW DAYS
3 WHERE THE JOB DIDN'T GET DONE AND NOTHING WAS WRITTEN DOWN.

4 Q WELL, I NOTICE A LOT OF THESE DAYS MIGHT BE
5 THREE IN A ROW LIKE I AM LOOKING AT --

6 A WELL, THAT IS PROBABLY A CONFERENCE. WE HAVE
7 CONFERENCES FOUR OR FIVE DAYS IN A ROW AND THAT WOULD HAVE
8 BEEN SOMETHING THAT WAS ON A SEPARATE FILE.

9 Q DO YOU EVER HAVE FAST DAYS AT CAMELOT?

10 A THERE ARE DAYS WHEN PEOPLE FAST. BUT THERE ARE
11 NOT SET DAYS THAT -- THAT, YOU KNOW, ONE EATS, FOR INSTANCE.

12 Q HOW OFTEN DO YOU HAVE CONFERENCES?

13 A THEY ARE HELD ON A QUARTERLY BASIS.

14 Q I NOTICE THERE IS A BLANK DATE IN SEPTEMBER AND
15 BLANK DATES IN OCTOBER AND BLANK DATES IN NOVEMBER. THEY
16 DIDN'T SNEAK ANY CONFERENCES IN ON YOU DURING THOSE MONTHS,
17 DID THEY?

18 A WELL, IF YOU ARE -- I DON'T SEE ANY BLANK DAYS
19 HERE IN SEPTEMBER. IF THIS IS '79 WE ARE LOOKING AT --

20 Q IT STARTS ON THE SECOND ON --

21 A RIGHT.

22 Q I AM LOOKING AT THE PAGE MR. KLEIN PHOTOCOPIED
23 FOR ME SO MAYBE IT IS DIFFERENT FROM THAT PAGE. SO THE
24 PAGES THAT HE PHOTOCOPIED FOR ME -- I SEE IT GOES HERE --
25 ALL THESE BLANK PAGES HERE ARE BECAUSE THE CALENDAR CHANGES?

26 A YES. THAT WOULD HAVE ACTUALLY BEEN FROM THE
27 MONTH BEFORE.

28 Q I NOTICE IN HERE THERE ARE SOME PREPRINTED

1 SCHEDULES OF WHAT WILL BE SERVED. ON THE PREPRINTED
2 SCHEDULES, ARE THOSE ALL SPECIAL DAYS?

3 A YES. THIS ONE, FOR INSTANCE, IS OUR OCTOBER
4 CONFERENCE. SO IT IS ONE, TWO, THREE, FOUR DAYS THAT WE
5 PRINT UP A SCHEDULE FOR A CONFERENCE. WE DO PLANNING A
6 LITTLE FURTHER AHEAD OF TIME SO FOOD CAN BE ORDERED AND WE
7 WOULDN'T BE MAKING CHANGES IN THE MENU THE WAY WE MIGHT ON A
8 DAILY BASIS.

9 Q WHILE -- YOU WERE THERE IN 1982, YOU ARE STILL
10 THERE, RIGHT?

11 A YES, THAT'S CORRECT.

12 Q WAS THERE SOMETHING ISSUED CALLED "MOTHER'S
13 TEACHING ON CLARE'S LUNCH."

14 A YES, I BELIEVE THERE WAS.

15 MR. LEVY: YOUR HONOR, I'D ASK THAT THIS BE MARKED
16 FOR IDENTIFICATION AS EXHIBIT NUMBER -- I BELIEVE WE ARE UP
17 TO 119.

18 THE COURT: NO. 118.

19 (MARKED FOR ID: ^ EXHIBIT 118, MOTHER'S

20 - - - - - ^ TEACHING ON CLARE'S LUNCH)

21 MR. LEVY: 118. THIS IS ONLY A PAGE AND JUST A
22 PARAGRAPH.

23 Q WAS THIS A TEACHING THAT CAME FROM MISS
24 PROPHET?

25 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT. THAT
26 DOCUMENT IS A 1982 DOCUMENT, WHICH IS BEYOND THE PERIOD THAT
27 WE ARE DEALING WITH HERE.

28 THE COURT: LET ME SEE IT.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

APPROACH THE BENCH, PLEASE.

(THE FOLLOWING PROCEEDINGS WERE HELD
AT THE BENCH:)

THE COURT: WHAT IS THE RELEVANCE OF THIS TO MR.
MULL'S CASE?

MR. LEVY: WELL, THIS WOMAN HAS TESTIFIED ABOUT WHAT
SHE WAS DOING THERE IN 1979 AND 1980 AND CERTAINLY MR. MULL
WAS NOT THERE FOR A PORTION OF TIME IN 1980. SHE'S
TESTIFIED THAT SHE HAS NO KNOWLEDGE OF WHAT HE WAS DOING IN
1975 OR WHAT HIS DIET WAS.

THIS DISPLAYS AN ATTITUDE OF THE CHURCH WITH
REGARD TO DIET. THEY HAVE TESTIFIED -- EVERY ONE OF THE
WITNESSES HAS TESTIFIED THAT WHILE THEY ARE THERE NOW,
EVERYTHING IS WONDERFUL, THE DIET IS WONDERFUL. I BELIEVE
THIS DISPLAYS SOME OF THE ATTITUDE ABOUT THE CHURCH IN THE
AREA OF CONTROL WITH REGARD TO THE DIET.

I BELIEVE IT IS EXTREMELY RELATIVE. IN LIGHT
OF MR. KLEIN'S WITNESSES TESTIFYING --

THE COURT: IT IS TRUE THAT MR. KLEIN'S PRODUCED
WITNESSES THAT TESTIFIED THAT AT VARIOUS TIMES THAT THEY
WERE AT CAMELOT, THAT AT VARIOUS TIMES AT SUMMIT U. AND
EVERYTHING WAS GLORIOUS AND TASTY.

MR. KLEIN: IF I MAY BE HEARD, YOUR HONOR. I HAVE
NEVER ASKED A WITNESS ANYTHING -- I HAVE NEVER EVER ASKED A
WITNESS A QUESTION ABOUT CAMELOT RELATING BEYOND 1981 WHEN
MR. MULL WAS THERE. TO START BRINGING IN ALL OF A SUDDEN
THINGS ABOUT 1982 AND OTHER YEARS IS SIMPLY IRRELEVANT TO
MR. MULL'S CASE.

1 THERE IS NOT ONE QUESTION THAT I HAVE EVER
2 ASKED WHERE I SAID, "TELL ME ABOUT 1982 OR '83." I ALWAYS
3 START OFF, "WERE YOU AT CAMELOT IN '79 AND '80 AND TELL ME
4 ABOUT THE FOOD." EVERY SINGLE WITNESS WAS IN CAMELOT FROM
5 '79 TO '80. I HAVE BEEN VERY CAREFUL TO DO THAT WHEN WE
6 TALK ABOUT FOOD.

7 FOR HIM TO BRING IN A DOCUMENT THAT LISTS 1982
8 IS TOTALLY IRRELEVANT. MR. MULL COULDN'T HAVE EATEN ANY OF
9 THAT FOOD, WHATEVER IT SAYS. I DON'T EVEN KNOW WHAT IT
10 SAYS.

11 THE COURT: JUST A MINUTE. THIS SEEMS TO BE OUT OF
12 TIME. YES, SIR.

13 MR. MIDDLETON: I HAVE ONE THING. WHETHER MR. KLEIN
14 BROUGHT IT UP OR NOT, CERTAINLY MR. LEVY HAS ASKED QUESTIONS
15 OF PEOPLE WHO HAVE BEEN AT CAMELOT FOR LONGER THAN THE
16 PERIOD OF TIME UP TO 1980. THEY HAVE BEEN THERE THROUGH
17 '82, '83, '84. MONROE SHEARER LEFT AS LATE AS WHO KNOWS
18 WHEN. THEY HAVE BEEN THERE FOR LONGER PERIODS OF TIME.

19 MR. LEVY HAS ASKED QUESTIONS FOR THAT WHOLE
20 PERIOD OF TIME THEY HAVE BEEN THERE, THE FOOD WAS WONDERFUL.
21 ALL THESE PEOPLE SAY YES. THERE IS NO RESTRICTION, THEY
22 ALWAYS CAN GET THAT.

23 IF THAT MATERIAL WAS OBJECTIONABLE, WHY WASN'T
24 IT OBJECTED AT THAT POINT IN TIME WHEN IT WAS ASKED? THIS
25 CAN BE USED AS A FORM OF IMPEACHMENT. I ADMIT IT GOES TO
26 '82. BUT WE HAVE GOT ANOTHER PROBLEM.

27 THIS IS A CHURCH THAT KEEPS ALL THE DOCUMENTS
28 THAT THEY WANT. IT IS VERY DIFFICULT FOR US TO FIND

1 DOCUMENTS LIKE THIS. WE HAVE TO HUNT AND SCRAPE FOR THESE
2 KINDS OF THINGS.

3 MR. LEVY: ONE OTHER THING, YOUR HONOR. MR. KLEIN
4 HAS PUT INTO EVIDENCE THEIR RECORDS THAT EXCEED THE PERIOD
5 OF TIME THAT MR. MULL WAS THERE. THEY HAVE PUT IN THE DIARY
6 FOR 1980. HE WAS NOT THERE ALL OF 1980.

7 MR. KLEIN HAS OPENED THE DOOR BY WHAT HE HAS
8 PUT INTO EVIDENCE ON HIS OWN. IF HE'S OPENED THE DOOR, I
9 DON'T BELIEVE HE HAS THE RIGHT TO CLOSE IT.

10 THE COURT: THE OBJECTION IS OVERRULED.

11 MR. KLEIN: MAY I BE HEARD?

12 THE COURT: I THINK WE SHOULD PROCEED.

13 MR. KLEIN: I UNDERSTAND, YOUR HONOR. I THINK TO SAY
14 THAT BECAUSE I PUT IN A LOG WHICH IS A 1980 LOG, IF I CUT IT
15 OFF, COUNSEL WOULD BE THE FIRST ONE TO SAY, "WHY DID YOU CUT
16 THE LOG UP?"

17 THERE IS NO TESTIMONY THAT MR. MULL HAS EVER
18 SEEN THAT DOCUMENT, THAT HE HAS EVER EATEN ANYTHING IN THAT
19 DOCUMENT. TO PUT IT IN IS SIMPLY A WAY TO PREJUDICE THIS
20 CASE. IT HASN'T ANY RELEVANCE IF MR. MULL HASN'T EATEN THAT
21 FOOD. IF HE HASN'T SEEN THE DOCUMENT, HOW COULD IT POSSIBLY
22 HAVE ANY RELEVANCE TO HIM AND HIS FOOD?

23 IF MR. LEVY HAS ASKED PEOPLE WHAT THEY ATE IN
24 1983 AND '84, AND I DON'T BELIEVE HE EVER HAS, THAT
25 CERTAINLY WOULDN'T MAKE IT NOW RELEVANT. I HAVE NEVER ASKED
26 A PERSON WHAT THEY ATE IN ANY TIME EXCEPT '79 AND '80. I
27 SAID, "WERE YOU IN CAMELOT IN" --

28 THE COURT: LET'S PROCEED. THE OBJECTION IS

1 OVERRULED.

2 (THE PROCEEDINGS WERE RESUMED IN OPEN
3 COURT IN THE PRESENCE OF THE JURY:)

4 Q BY MR. LEVY: I WONDER IF YOU'D BE KIND ENOUGH
5 TO READ THIS DOCUMENT TO THE COURT. IF YOU WOULD SPEAK
6 RIGHT INTO THE MICROPHONE SO WE CAN ALL HEAR ABOUT "MOTHER'S
7 TEACHING ON CLARE'S LUNCH."

8 MR. KLEIN: FOR THE RECORD, YOUR HONOR, I WOULD
9 OBJECT AS TO THE RELEVANCE OF THE '82 DOCUMENT.

10 THE COURT: THE OBJECTION IS OVERRULED.

11 THE WITNESS: THIS IS FROM THE JOHN THE BELOVED
12 SEMINAR, JULY, 1982. (READING.)

13 "TO GET TO BE A DISCIPLE OF
14 JESUS CHRIST, YOU MUST BE TESTED BY THE
15 DOCTRINE OF THE EATING OF THE FLESH AND THE
16 BLOOD, THE ALPHA AND THE OMEGA OF JESUS.

17 "NOW, I STARTED OUT" -- THAT IS A
18 QUOTE, BEGINNING OF A QUOTE.

19 "NOW, I STARTED OUT WITH A
20 CUSTOM, WHICH IS PURSUED HERE AT WEDNESDAY
21 LUNCH, OF SERVING THE COMMUNITY THE LUNCH
22 THAT I EAT ON A REGULAR BASIS, WHICH IS THE
23 RAW FOOD, THE NUMBER ONE DIET. AND I DID
24 THIS OUT OF THE GREAT LOVE OF MY HEART
25 BECAUSE IT'S A DIFFICULT MEAL TO PREPARE.
26 IT TAKES A LOT OF WORK. AND I WANTED PEOPLE
27 TO REMEMBER WHAT THE NUMBER ONE DIET IS AND
28 HOW GOOD IT IS FOR YOU. AND I CONCEIVED OF

1 THIS LUNCH AS A COMMUNION BETWEEN MYSELF AND
2 THE STAFF, MANY OF WHOM DO NOT FEEL, IN THE
3 WORK THAT THEY DO, THAT THEY CAN LIVE ON
4 THIS ON A DAILY BASIS.

5 "WELL, WHAT I SET FORTH IN LOVE
6 HAS BECOME A GREAT SOURCE OF TESTING OF
7 INDIVIDUALS. PEOPLE WERE ANGRY. THEY WERE
8 ANGRY THEY COULDN'T FEED THEIR CHILDREN WHAT
9 THEIR CHILDREN WANTED TO EAT. THEY DEMAND
10 OTHER FOOD THAT'S NOT BEING SERVED. AND ALL
11 KINDS OF ENERGY COMES UP. AND SO, THIS WAS
12 REHEARSED TO ME YESTERDAY BY OUR COOKS, WHO
13 HAVE STARTED TO OFFER ALTERNATIVE FOOD BY
14 THESE DEMANDS.

15 "AND I SAID, 'THERE IS NO
16 ALTERNATIVE FOOD.' THE ONLY ALTERNATIVE IS
17 THE ONE COOKED MEAL OF THE LUNCH WHICH IS A
18 VERY HEARTY SOUP. SO, IF YOU ABSOLUTELY
19 WON'T EAT THE RAW FOOD, YOU CAN JUST EAT
20 THREE OR FOUR BOWLS OF BARLEY SOUP AND HAVE
21 THE POWER TO GO ON.

22 "SO, I REALIZED YESTERDAY THAT
23 THIS IS THE INITIATION AND THAT BECAUSE I
24 HAVE MADE THIS SPREAD OF LOVELY FOOD ON
25 WEDNESDAY, THE PEOPLE WHO ARE REFUSING TO
26 EAT IT OR FUSSING ABOUT IT ARE REALLY HAVING
27 A PROBLEM WITH THIS DOCTRINE OF EATING MY
28 FLESH AND DRINKING MY BLOOD, BECAUSE IT IS

1 MY ALPHA/OMEGA GIFT EACH WEDNESDAY. IT IS
2 MY COMMUNION.

3 "ON THE FACE OF IT, IF YOU JUST
4 LOOK AT IT FROM THE HUMAN SENSE, I AM THE
5 HOSTESS OF MORYA THAT WELCOMES HIS CHELAS
6 HERE. I AM THE HOSTESS OF CAMELOT. AND I
7 AM INVITING MY FRIENDS TO LUNCH.

8 "WELL, WHEN YOU GO TO LUNCH
9 SOMEWHERE IN A FORMAL SENSE, YOU DON'T SAY,
10 'I DON'T LIKE YOUR FOOD. GIVE ME SOMETHING
11 ELSE.' YOU EAT WHAT IS SERVED. IF YOU WENT
12 TO THE LAST SUPPER AND ATE WITH JESUS, YOU'D
13 EAT WHAT WAS SERVED AND YOU WOULDN'T SAY, 'I
14 DON'T LIKE THAT KIND OF BREAD. GIVE ME
15 PUMPERNICKEL,' YOU KNOW.

16 "BUT PEOPLE ARE DOING IT HERE.
17 AND WHY? THEY ARE CRYING, 'MY RIGHT, MY
18 RIGHT, MY RIGHT. I HAVE A RIGHT TO EAT WHAT
19 I FEEL LIKE EATING.'.

20 "AND, OF COURSE, WHAT THEY ARE
21 REVEALING IS THAT THEY ARE SLAVES TO CERTAIN
22 KINDS OF FOOD. THEY ARE ADDICTED. AND IT
23 GOES TO SHOW THAT IN ALL OF US WE HAVE
24 CERTAIN ADDICTIONS. THE BODY HAS CRAVINGS
25 AND WE SPOIL THE BODY AND WE FILL ITS
26 CRAVINGS.

27 "I KNOW THAT OLDER PEOPLE WILL
28 PUT UP THE EXCUSE, I'VE HEARD IT FOR YEARS,

1 'I CAN'T EAT RAW FOOD. I CAN'T EAT RAW
2 FOOD.' WELL, THEN, YOU EAT A LITTLE BIT AND
3 YOU CHEW IT UNTIL IT IS PULVERIZED ALMOST TO
4 THE POINT OF BEING BABY FOOD AND YOU TRAIN
5 YOUR BODY TO START RECEIVING A CERTAIN
6 AMOUNT OF RAW FOOD. AND, THE SPROUTS ARE
7 VERY TENDER. AND YOU CAN PREPARE THE FOOD
8 WITH WHAT GOD GAVE YOU TO PREPARE IT WITH,
9 YOUR MOUTH AND YOUR SALIVA AND YOUR TEETH,
10 AND MAKE IT FIT FOR YOUR BODY.

11 "SO, I HAVE DECIDED TO BECOME
12 MORE INTENSE IN THIS FIERY DISCIPLINE ON
13 WEDNESDAY, AND I AM GIVING YOU ADVANCE
14 WARNING SO THAT YOU WON'T MAKE THE MISTAKE
15 OF GRIPING AND GRUMBLING WHEN YOU GET TO THE
16 CAFETERIA TODAY FOR THIS CLARE'S LUNCH."

17 END OF QUOTE.

18 Q BY MR. LEVY: DO YOU FOLLOW THE MOTHER'S
19 DICTATES?

20 A DO I FOLLOW THEM PERSONALLY?

21 Q YES, MA'AM.

22 A I EAT SOME RAW FOOD ON A REGULAR BASIS, NOT
23 NECESSARILY STRICTLY A RAW FOOD DIET.

24 MR. LEVY: NOTHING FURTHER, YOUR HONOR. WE'D ASK
25 THAT THAT EXHIBIT BE PLACED INTO EVIDENCE.

26 THE COURT: IT'S RECEIVED.

27 (RECEIVED EVID: ^ EXHIBIT 118)

28 MR. KLEIN: I WOULD OBJECT.

REDIRECT EXAMINATION +

1
2 BY MR. KLEIN:

3 Q WHEN MR. MULL WAS AT CAMELOT IN 1979 AND FIRST
4 PART -- FIRST HALF OF 1980, WAS THAT PARTICULAR CLARE'S
5 LUNCH SERVED?

6 A NOT AS A SPECIFIC LUNCH AS REFERRED TO IN THIS
7 CASE, NO. SOME OF THE ELEMENTS WERE ALWAYS OUT IN ADDITION
8 TO THE OTHER FOOD.

9 Q WHEN MR. MULL WAS AT CAMELOT, IF SOME OF THOSE
10 ELEMENTS WERE PRESENT, WOULD THERE STILL BE ALL THE OTHER
11 THINGS THAT YOU'VE LISTED, THE NORMAL THINGS THAT WOULD BE
12 SERVED?

13 A OH, YES.

14 MR. KLEIN: JUST ONE MOMENT, YOUR HONOR.

15 Q WHEN THAT CLARE'S LUNCH WAS SERVED IN 1982
16 AFTER MR. MULL HAD LEFT CAMELOT, WERE THERE OTHER THINGS
17 ALSO SERVED, SALAD BAR, FOR EXAMPLE?

18 A OH, YES. IT IS PART OF THE RAW MEAL ACTUALLY
19 IS THE COMPLETE SALAD BAR, AS I DESCRIBED BEFORE, IN
20 ADDITION TO THE RAW LUNCH ITEMS AND THE SOUP.

21 Q WHAT WERE THE ITEMS THAT WOULD BE IN THE RAW
22 LUNCH FROM CLARE'S LUNCH?

23 A WELL, IT IS QUITE A LONG LIST ACTUALLY. BUT IT
24 INCLUDES RAW VEGETABLES, IT INCLUDES NUMEROUS DIPS AND
25 SPREAD THAT YOU CAN USE WITH YOUR VEGETABLES THAT ARE MOST
26 OF THEM ARE HIGH PROTEIN ITEMS MADE FROM ALMONDS OR SPROUTED
27 FOOD SO THEY CAN BE SPREAD, YOU KNOW, USED AS A SPREAD ON
28 YOUR BREAD.

1 THERE IS A SPROUTED WHOLE GRAIN BREAD THAT IS
2 ALSO SERVED WITH THE MEAL. AND THEN OF COURSE THERE IS THE
3 SOUP AND A HOT RICE IS ALSO SERVED ALONG WITH THE MEAL ON A
4 REGULAR BASIS.

5 Q NOW, IN 1982 WHEN THAT CLARE'S LUNCH WAS
6 SERVED, WAS MEAT SERVED?

7 A IN --

8 MR. LEVY: I WOULD OBJECT, YOUR HONOR. I THINK THE
9 MENU SPEAKS FOR THEMSELVES. THEY ARE THE BEST EVIDENCE.

10 THE COURT: SHE CAN ANSWER.

11 THE WITNESS: IN 1982, WE WERE OFFERING MEAT IN THE
12 CAFETERIA.

13 THE COURT: WE WILL RESUME AT 1:30.

14 (AT 11:58 A.M., A RECESS WAS TAKEN UNTIL
15 1:30 P.M. OF THE SAME DAY.)

16
17
18
19
20
21
22
23
24
25
26
27
28

1 LOS ANGELES, CALIFORNIA; THURSDAY, MARCH 13, 1986 *

2 1:44 P.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 SUSAN HARROW, +

7 THE WITNESS ON THE STAND AT THE TIME OF THE RECESS, RESUMES
8 THE STAND AND TESTIFIES FURTHER AS FOLLOWS:

9 THE CLERK: MA'AM, YOU PREVIOUSLY HAVE BEEN SWORN AND
10 ARE STILL UNDER OATH. PLEASE STATE YOUR NAME AGAIN FOR THE
11 RECORD.

12 THE WITNESS: SUSAN HARROW.

13 THE CLERK: THANK YOU,

14 THE COURT: PLEASE PROCEED.

15 MR. KLEIN: THANK YOU, YOUR HONOR.

16
17 REDIRECT EXAMINATION + (RESUMED)

18 BY MR. KLEIN:

19 Q MISS HARROW, THIS CLARE'S LUNCH THAT WAS SERVED
20 IN 1982, HOW MANY MEALS A WEEK WAS IT SERVED?

21 A IT WAS JUST ONE MEAL A WEEK ON WEDNESDAYS,
22 WEDNESDAY LUNCH.

23 Q WHEN THEY SERVED THAT CLARE'S LUNCH, DID THEY
24 HAVE A SOUP SERVED, ALSO?

25 A YES. THERE WAS ALWAYS A HOT SOUP SERVED.

26 Q WOULD IT BE THE SAME SOUP?

27 A NO. IT WOULD VARY. IT WAS USUALLY A HARDY
28 VEGETABLE SOUP WITH A GRAIN LIKE BARLEY AND VEGETABLE OR

1 SOMETHING LIKE THAT.

2 Q AND IN 1982, WHEN THEY WERE SERVING THE CLARE'S
3 LUNCH, DID THEY SERVE MEAT -- NOT AT THE SAME MEAL, BUT AT
4 CAMELOT?

5 A YES. MEAT WAS SERVED.

6 Q CHICKEN?

7 A YES.

8 Q FISH?

9 A YES.

10 MR. KLEIN: THANK YOU.

11 NO FURTHER QUESTIONS, YOUR HONOR.

12 MR. LEVY: JUST MAYBE ONE.

13

14 RECROSS-EXAMINATION +

15 BY MR. LEVY:

16 Q MISS HARROW, JUST OUT OF CURIOSITY, DO YOU HAVE
17 ANY DEGREES IN NUTRITION OR DIETARY ANYTHING?

18 A NO, I DON'T, SIR.

19 Q WITH REGARD TO THIS TEACHING FROM MOTHER, I
20 KNOW YOU ARE NOT A PSYCHOLOGIST EITHER, BUT DO YOU THINK
21 WHEN ELIZABETH SAID THAT, "PEOPLE WHO ARE REFUSING TO EAT IT
22 OR FUSSING ABOUT IT ARE REALLY HAVING A PROBLEM WITH THIS
23 DOCTRINE OF EATING MY FLESH AND DRINKING MY BLOOD," SHE SAID
24 THAT BECAUSE THERE MIGHT HAVE BEEN A FEW PEOPLE COMPLAINING
25 ABOUT THE DIET?

26 MR. KLEIN: I AM GOING TO OBJECT. THAT IS
27 SPECULATION, YOUR HONOR.

28 THE COURT: SHE CAN ANSWER IF SHE KNOWS.

1 THE WITNESS: I THINK I'D HAVE TO HAVE YOU REPEAT THE
2 QUESTION IF I WAS GOING TO ANSWER IT.

3 Q BY MR. LEVY: OKAY. I STARTED OUT BY SAYING
4 SINCE YOU ARE NOT A PSYCHOLOGIST, THIS MIGHT TEST YOUR
5 INTELLECT A LITTLE BIT.

6 AND I ASKED YOU IF YOU THINK WHEN SHE WROTE,
7 "THE PEOPLE WHO ARE REFUSING TO EAT IT OR FUSSING ABOUT IT
8 ARE REALLY HAVING A PROBLEM WITH THIS DOCTRINE OF EATING MY
9 FLESH AND DRINKING MY BLOOD," THAT THIS DOCUMENT MIGHT HAVE
10 BEEN PRECIPITATED BY SOME COMPLAINTS FROM THE MEMBERS OF THE
11 COMMUNITY?

12 A WELL, I'D REALLY HAVE TO MAKE A GUESS. ONCE IN
13 A WHILE SOMEONE COMPLAINS ABOUT SOMETHING THAT IS SERVED.
14 IT IS KIND OF TRUE IN EVERY CAFETERIA.

15 Q NO, NO, NO. I AM NOT ASKING ABOUT EVERY
16 CAFETERIA. I AM ASKING ABOUT MOTHER AND THE PEOPLE AT THE
17 CHURCH.

18 A WELL, I -- I MEAN I WASN'T DIRECTLY INVOLVED IN
19 THE -- IN THE PRECIPITATION OF THAT DOCUMENT AT THE TIME,
20 YOU KNOW, I REALLY WASN'T ONE OF THE COOKS THEN. SO I DON'T
21 THINK I COULD REALLY SAY.

22 Q IN YOUR EXPERIENCE, DID MOTHER WRITE A DOCUMENT
23 LIKE THIS EVERY TIME SOMEBODY COMPLAINED ABOUT SOMETHING?

24 A NOT TO MY KNOWLEDGE.

25 MR. LEVY: SOMETIMES SHE DIDN'T WRITE DOCUMENTS WHEN
26 THEY COMPLAINED.

27 I HAVE NOTHING FURTHER, YOUR HONOR.

28 ///

1 FURTHER REDIRECT EXAMINATION +

2 BY MR. KLEIN:

3 Q MR. LEVY ASKED IF YOU WERE A DIETITIAN OR
4 NUTRITIONIST. TO YOUR KNOWLEDGE, HAS THAT CLARE'S LUNCH
5 EVER BEEN ANALYZED AS FAR AS BY ANY NUTRITIONIST?

6 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THIS
7 CALLS FOR -- I MAY BE PRECIPITOUS. IT WOULD CALL FOR
8 HEARSAY IF HE ASKED THE SECOND QUESTION.

9 Q BY MR. KLEIN: HAS IT EVER BEEN ANALYZED BY A
10 NUTRITIONIST, A PROFESSIONAL NUTRITIONIST?

11 A ACTUALLY, THE DIET HAS BEEN ANALYZED BY A
12 COMPUTER COMPANY. IT'S CALLED COMPUTRITION, WHICH HAS ALL
13 FOODS LISTED ON A COMPUTER WITH THEIR --

14 MR. LEVY: AT THIS POINT I WILL OBJECT.

15 THE COURT: YOU HAVE ANSWERED THE QUESTION.

16 ANYTHING ELSE?

17 MR. KLEIN: YES.

18 Q WITHOUT TELLING ME WHAT THE COMPANY SAID, AFTER
19 THEY ANALYZED IT, WAS CLARE'S LUNCH CHANGED IN ANY WAY?

20 A NO. IT WASN'T NECESSARY TO.

21 Q BY THE WAY, HOW OLD ARE YOU?

22 A I AM 39.

23 MR. KLEIN: THANK YOU.

24 I HAVE NO FURTHER QUESTIONS.

25 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

26 THE COURT: ALL RIGHT. YOU ARE EXCUSED.

27 THE WITNESS: THANK YOU.

28 MR. KLEIN: DOCTOR JAMES RICHARDSON, YOUR HONOR.

1 YOUR HONOR, MAY I STEP OUT --

2 THE COURT: SURE.

3 MR. KLEIN: THE WITNESS IS MOMENTARILY INDISPOSED,
4 BUT WILL BE HERE IN A MOMENT. I THINK HE HAD A CALL FROM A
5 HIGHER AUTHORITY.

6

7 JAMES T. RICHARDSON, +

8 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
9 TESTIFIES AS FOLLOWS:

10 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.

11 THE WITNESS: THANK YOU.

12 THE CLERK: SIR, PLEASE STATE YOUR NAME FOR THE
13 RECORD AND PLEASE SPELL IT.

14 THE WITNESS: MY NAME IS JAMES T. RICHARDSON.

15 J-A-M-E-S, T, R-I-C-H-A-R-D-S-O-N.

16 THE CLERK: SLOWER, SIR.

17 THE WITNESS: OH. PARDON ME. R-I-C-H-A-R-D-S-O-N.

18 THE CLERK: THANK YOU.

19 THE COURT: PROCEED.

20

21 DIRECT EXAMINATION +

22 BY MR. KLEIN:

23 Q COULD YOU PLEASE TELL US YOUR EDUCATIONAL
24 BACKGROUND IN THE FIELD OF SOCIOLOGY AND SOCIAL PSYCHOLOGY?

25 A YES. I HAVE A BACHELOR'S AND A MASTER'S IN
26 SOCIOLOGY FROM TEXAS TECH UNIVERSITY. I RECEIVED A PH.D. IN
27 SOCIOLOGY FROM WASHINGTON STATE UNIVERSITY WITH A SPECIAL
28 AREA OF EMPHASIS IN SOCIAL PSYCHOLOGY, THE AREA IN WHICH I

1 DID MY DISSERTATION. ALSO HAD A COMPUTER SCIENCE MINOR FOR
2 THE PH.D. AT WASHINGTON STATE.

3 Q WHAT IS SOCIOLOGY AND SOCIAL PSYCHOLOGY?

4 A SOCIOLOGY IS THE STUDY OF GROUPS AND HOW THEY
5 RELATE TO ONE ANOTHER, HOW THEY ARE ORGANIZED, HOW THEY
6 FUNCTION, HOW THEY CHANGE OVER TIME. SOCIAL PSYCHOLOGY
7 LOOKS AT THE INDIVIDUAL IN RELATIONSHIP TO THE GROUP, AND
8 TALKS ABOUT HOW THE GROUP INFLUENCES THE INDIVIDUAL AND VICE
9 VERSA.

10 Q COULD YOU PLEASE GIVE US YOUR PROFESSIONAL
11 BACKGROUND?

12 A I AM CURRENTLY PROFESSOR OF SOCIOLOGY AT THE
13 UNIVERSITY OF NEVADA IN RENO. I AM ALSO A FACULTY MEMBER IN
14 THE JOINT PROGRAM SPONSORED BY THE DEPARTMENT OF SOCIOLOGY
15 AND PSYCHOLOGY IN SOCIAL PSYCHOLOGY, WHICH IS A PH.D.
16 PROGRAM.

17 I HAVE ALSO BEEN INVOLVED IN TEACHING AT TWO
18 UNIVERSITIES OVERSEAS. LONDON SCHOOL OF ECONOMICS, WHERE I
19 SPENT A SABBATICAL OF A YEAR IN 1974 AND '75, AND CATHOLIC
20 SCHOOL IN NIJMEGEN, WHERE I SPENT SEMESTER AS A FULBRIGHT
21 FELLOW.

22 Q HAVE YOU RECEIVED ANY HONORS AND/OR AWARDS IN
23 THE FIELD OF SOCIOLOGY OR SOCIAL PSYCHOLOGY?

24 A YES, I HAVE. I JUST MENTIONED THE FACT THAT I
25 SPENT TWO YEARS OVERSEAS. THE LONDON SCHOOL OF ECONOMICS.
26 TIME THAT I SPENT THERE, I WAS A VISITOR IN SOCIOLOGY IN THE
27 DEPARTMENT OF SOCIOLOGY, HAD A SABBATICAL. THE FULBRIGHT
28 IS, OF COURSE, AN AWARD THAT IS COMPETITIVE.

1 I HAVE ALSO BEEN ELECTED THIS YEAR AS PRESIDENT
2 OF THE ASSOCIATION FOR THE SOCIOLOGY OF RELIGION, WHICH IS
3 AN INTERNATIONAL ORGANIZATION OF SOME 6- OR 700 SOCIOLOGISTS
4 AND SOCIAL PSYCHOLOGISTS OF RELIGION. THAT ORGANIZATION
5 SPONSORS A JOURNAL CALLED "SOCIOLOGICAL ANALYSIS." WE HAVE
6 MEETINGS. I WILL BE IN CHARGE OF THE ANNUAL MEETING THIS
7 YEAR.

8 I HAVE ALSO SERVED ON EDITORIAL BOARDS OF A
9 NUMBER OF JOURNALS IN THE FIELD OF SOCIOLOGY, SOCIAL
10 PSYCHOLOGY AND RELIGIOUS STUDIES.

11 I HAVE BEEN INVITED TO GIVE LECTURES IN EIGHT
12 OR NINE DIFFERENT COUNTRIES IN MY AREA OF STUDY, WHICH IS
13 THE STUDY OF NEW RELIGIONS. THAT INCLUDES INVITATIONS TWO
14 DIFFERENT TIMES TO GO TO OXFORD TO CONFERENCES, PRESENT
15 PAPERS, SCHOOL OF THEOLOGY AT UPPSALA UNIVERSITY, STOCKHOLM
16 UNIVERSITY AND HAGUE, CATHOLIC UNIVERSITY AT NIJMEGEN, AT
17 L.A.C., DURHAM UNIVERSITY, STERLING UNIVERSITY IN SCOTLAND
18 AND A NUMBER OF OTHER SUCH PLACES.

19 I ALSO HAVE RECEIVED GRANTS FROM THE NATIONAL
20 ENDOWMENT FOR THE HUMANITIES, NATIONAL SCIENCE FOUNDATION
21 AND THE AMERICAN COUNCIL OF LEARNED SOCIETIES.

22 I HAVE EDITED THREE SPECIAL ISSUES OF JOURNALS
23 THAT DEAL WITH THE AREA OF NEW RELIGIONS AND NEW RELIGIOUS
24 STUDIES.

25 AT ONE TIME I WAS INVITED AS THE AMERICAN
26 REPRESENTATIVE ON A COMMITTEE SPONSORED BY UNESCO TO STUDY
27 NEW RELIGIONS IN EUROPE AND WAS RESPONSIBLE FOR
28 PARTICIPATING IN SOME CONFERENCES THERE TRYING TO COMPARE

1 THE AMERICAN EXPERIENCE WITH THE EUROPEAN EXPERIENCE.

2 Q HAVE YOU RECEIVED ANY HONORS FROM PSYCHOLOGICAL
3 OR PSYCHIATRIC ORGANIZATIONS?

4 A YES, I HAVE. I HAVE BEEN INVITED TO BECOME A
5 PROFESSIONAL AFFILIATE WITH THE AMERICAN PSYCHOLOGICAL
6 DIVISION 36, WHICH IS THE DIVISION ENTITLED PSYCHOLOGISTS
7 INTERESTED IN RELIGIOUS ISSUES. HAS SEVERAL HUNDRED
8 MEMBERS, VERY FEW WHO ARE NOT MEMBERS OF THE A.P.A. AND
9 PRACTICING PSYCHOLOGISTS.

10 ALSO RECENTLY I WAS INVITED TO PARTICIPATE IN A
11 STUDY THAT IS BEING DONE BY THE AMERICAN PSYCHIATRIC
12 ASSOCIATION. DR. MARC GALANTER, A PSYCHIATRIST AT ALBERT
13 EINSTEIN SCHOOL OF MEDICINE IN NEW YORK, HAS BEEN ASKED TO
14 EDIT A VOLUME THAT DEALS WITH CULTS AND NEW RELIGIONS. AND
15 I AM ONE OF THREE SOCIOLOGISTS THAT HAVE BEEN ASKED TO
16 PRESENT PAPERS IN THAT VOLUME.

17 Q HAVE YOU WRITTEN ANY BOOKS OR ARTICLES IN THE
18 FIELD OF SOCIOLOGY AND SOCIAL PSYCHOLOGY DEALING WITH
19 RELIGION?

20 A YES, I HAVE. I HAVE DONE THREE BOOKS IN THIS
21 AREA. THE FIRST IS ENTITLED "ORGANIZED MIRACLES: A
22 SOCIOLOGICAL STUDY OF JESUS MOVEMENT ORGANIZATION." THAT IS
23 ABOUT A 350-PAGE VOLUME THAT FOCUSED ON A NATIONWIDE JESUS
24 MOVEMENT ORGANIZATION THAT WAS RATHER PROMINENT IN THE EARLY
25 SEVENTIES.

26 I HAVE ALSO DONE -- EDITED A VOLUME CALLED
27 "CONVERSION CAREERS: IN AND OUT OF THE NEW RELIGIONS."
28 THAT WAS ORIGINALLY PUBLISHED AS A SPECIAL ISSUE OF THE

1 AMERICAN BEHAVIORAL SCIENTIST THAT I WAS ASKED TO EDIT AND
2 SAGE PUBLICATIONS CHOSE TO PUT IT OUT AS A SEPARATE VOLUME
3 CALLED "CONVERSION CAREERS."

4 I HAVE ALSO RECENTLY EDITED AND CONTRIBUTED TO
5 A VOLUME ENTITLED "BRAINWASHING/DEPROGRAMMING CONTROVERSY:
6 SOCIOLOGICAL, PSYCHOLOGICAL, LEGAL AND HISTORICAL
7 PERSPECTIVES." AND THAT CAME OUT IN 1983.

8 I AM CURRENTLY WORKING ON A FOURTH BOOK CALLED
9 "MONEY AND POWER IN THE NEW RELIGIONS."

10 DO YOU WANT ME TO TALK ABOUT THE ARTICLES NOW
11 OR --

12 Q AS FAR AS ARTICLES, YOU MIGHT GIVE US AN IDEA
13 OF HOW MANY YOU HAVE WRITTEN AND THEN GIVE US SOME OF THE
14 MORE PROMINENT ONES THAT DEAL WITH THE MATTER THAT THE COURT
15 IS LOOKING AT IN THIS CASE.

16 A ALL RIGHT. I HAVE PUBLISHED OVER 50 ARTICLES
17 IN REFEREE PROFESSIONAL JOURNALS.

18 Q WHAT IS A REFEREE PROFESSIONAL JOURNAL?

19 A A REFEREE PROFESSIONAL JOURNAL IS A JOURNAL
20 THAT WILL ACCEPT SUBMISSIONS. THEN THEY SELECT REVIEWERS
21 WHO ARE KNOWLEDGEABLE IN THE FIELD AND ANONYMOUSLY HAVE THE
22 PAPERS REVIEWED. THE REVIEWERS REVIEW THEM ANONYMOUSLY IN
23 TERMS OF THE QUALITY OF THE ARTICLE AND MAKE A
24 RECOMMENDATION TO THE EDITOR WHETHER OR NOT TO PUBLISH THEM.

25 MOST OF THE REFEREE JOURNALS IN WHICH I HAVE
26 PUBLISHED HAVE REJECTION RATES OF AROUND 85 OR 90 PERCENT,
27 SO THE REFEREEING IS A PRETTY TOUGH PROCESS. I COULD NAME
28 SOME OF THESE JOURNALS FOR THE RECORD IF YOU WOULD LIKE.

1 Q WHY DON'T YOU JUST NAME JUST A FEW.

2 A WELL, JUST A FEW OF THE JOURNALS I HAVE
3 PUBLISHED IN THE AMERICAN JOURNAL OF SOCIOLOGY, AMERICAN
4 SOCIOLOGIST, SOCIAL FORCES, EUROPEAN JOURNAL OF SOCIAL
5 PSYCHOLOGY, REVIEW OF RELIGIOUS RESEARCH, SOCIOLOGICAL
6 ANALYSIS, MARRIAGE AND FAMILY REVIEW, AND NATIONAL JOURNAL
7 OF SOCIAL PSYCHOLOGY, JOURNAL OF COMMUNITY PSYCHOLOGY, THE
8 AMERICAN PSYCHOLOGIST, JOURNAL FOR THE SCIENTIFIC STUDY OF
9 RELIGION AND SOME OTHERS.

10 I MIGHT NOTE FOR THE RECORD THAT OVER 20 OF
11 THESE PAPERS HAVE ALSO BEEN REPRINTED IN OTHER VOLUMES.
12 WOULD YOU LIKE -- I COULD READ THE TITLES OF A FEW OF THEM
13 TO GIVE THE FLAVOR.

14 Q WITHOUT GIVING US ALL OF THE ARTICLES, WHY
15 DON'T YOU JUST TELL US THE TITLES OF A FEW OF THE ARTICLES
16 THAT WOULD DEAL WITH THE SUBJECTS THAT THIS COURT IS DEALING
17 WITH NOW.

18 A OKAY. ONE OF THE FIRST THINGS I DID WAS BACK
19 IN 1972. THIS ISN'T A REFEREE JOURNAL, BUT IT IS
20 WELL-KNOWN. IT IS PSYCHOLOGY TODAY. AND THEY INVITED A
21 PIECE FROM ME FOR THEIR CHRISTMAS ISSUE ON "THE JESUS
22 PEOPLE" I DID WITH TWO GRADUATE STUDENTS.

23 "CONVERSION PROCESS MODELS AND THE JESUS
24 MOVEMENT," PUBLISHED IN THE AMERICAN BEHAVIORAL SCIENTIST.
25 "CULT TO SECT: CREATIVE ECLECTICISM IN NEW RELIGIOUS
26 GROUPS," IN THE PACIFIC SOCIOLOGICAL REVIEW.

27 "CONVENTIONAL PSYCHOTHERAPIES AND
28 UNCONVENTIONAL NEW RELIGIONS IN A PLURALISTIC SOCIETY," DONE

1 WITH ONE OF MY STUDENTS, ROD KILBOURNE, PUBLISHED IN '84 IN
2 THE AMERICAN PSYCHOLOGIST.

3 "SOCIAL EXPERIMENTATION: SELF PROCESS OR NEW
4 SOCIAL ROLE," THAT WAS PUBLISHED LAST YEAR IN THE
5 INTERNATIONAL JOURNAL OF SOCIAL PSYCHIATRY.

6 AND ONE LAST ONE THAT I THINK I WILL BE TALKING
7 FROM A LITTLE TODAY, "THE ACTIVE VERSUS PASSIVE CONVERT:
8 PARADIGM CONFLICT IN CONVERSION/RECRUITMENT RESEARCH." THAT
9 WAS PUBLISHED LAST YEAR IN THE JOURNAL FOR THE SCIENTIFIC
10 STUDY OF RELIGION.

11 Q ARE YOU A MEMBER OF ANY ORGANIZATIONS INVOLVED
12 IN THE PRACTICE OF SOCIOLOGY OR SOCIAL PSYCHOLOGY?

13 A YES. I AM A MEMBER OF A NUMBER OF PROFESSIONAL
14 ORGANIZATIONS. THE AMERICAN SOCIOLOGICAL ASSOCIATION, WHICH
15 IS THE NATIONAL ORGANIZATION FOR SOCIOLOGISTS. THE PACIFIC
16 SOCIOLOGICAL ASSOCIATION, WHICH IS THE REGIONAL ORGANIZATION
17 I AM A MEMBER OF.

18 THE SOCIETY FOR THE SCIENTIFIC STUDY OF
19 RELIGION, WHICH IS THE LARGEST SUCH ORGANIZATION IN THE
20 WORLD THAT DOES SPONSOR SCIENTIFIC STUDIES OF VARIOUS TYPES
21 ON THE TOPIC OF RELIGION. THE ASSOCIATION FOR THE SOCIOLOGY
22 OF RELIGION, I MENTIONED THAT I AM PRESIDENT OF THAT THIS
23 YEAR. THE SOCIETY FOR THE SOCIOLOGICAL STUDY OF MORMON
24 LIFE.

25 THE INTERNATIONAL CONFERENCE FOR THE SOCIOLOGY
26 OF RELIGION, WHICH IS A EUROPEAN-BASED ORGANIZATION OF
27 MEMBERS FROM SOME 40 OR 50 DIFFERENT COUNTRIES. THE BRITISH
28 SOCIOLOGICAL SOCIOLOGY OF RELIGION STUDY GROUP. THE

1 RELIGIOUS RESEARCH ASSOCIATION.

2 I AM A MEMBER OF ALL THOSE ORGANIZATIONS AND
3 HAVE BEEN OFFICER IN SEVERAL OF THEM.

4 Q DURING YOUR CAREER, HAVE YOU HAD OCCASION TO
5 GAIN KNOWLEDGE AND EXPERIENCE DUE TO PERSONAL OBSERVATIONS
6 WITH RESPECT TO NEW AGE RELIGIONS?

7 A YES, I HAVE. OVER THE -- I STARTED RESEARCH
8 ON -- THEY WEREN'T CALLED NEW AGE RELIGIONS THEN. PEOPLE
9 WERE JUST BEGINNING TO GET CURIOUS. BUT BACK IN 1970, '71
10 IS WHEN I BEGAN MY RESEARCH. THAT IS THE TIME WHEN A LOT OF
11 MEDIA ATTENTION WAS FOCUSED ON THEM. I HAVE BEEN STUDYING
12 THEM EVER SINCE.

13 Q CAN YOU TELL US DURING YOUR RESEARCH, HAVE YOU
14 HAD AN OPPORTUNITY TO EITHER CONDUCT OR SUPERVISE INTERVIEWS
15 WITH MEMBERS OF WHAT WE ARE CALLING NOW NEW AGE RELIGIONS?

16 A YES, I HAVE. I HAVE SUPERVISED A NUMBER OF
17 DOCTORAL STUDENTS AND MASTER'S LEVEL STUDENTS WHO HAVE DONE
18 THEIR THESES OR DISSERTATIONS IN THIS AREA. I HAVE ALSO
19 PARTICIPATED IN VARIOUS RESEARCH PROJECTS FOCUSING ON
20 DIFFERENT ASPECTS OF NEW RELIGIONS.

21 IF YOU WANT ME TO ENUMERATE THE TYPES OR
22 SOMETHING OF THAT NATURE, I WOULD BE HAPPY TO DO THAT.

23 Q AS A PART OF YOUR OWN PERSONAL EXPERIENCE, DO
24 YOU EVER USE QUESTIONNAIRE TYPE DEVICES?

25 A YES. IN FACT, WE HAVE I THINK PROBABLY THE
26 LARGEST DATA SET AROUND ANYWHERE IN TERMS OF THAT KIND OF
27 INFORMATION ON A SPECIFIC NEW RELIGIOUS GROUP. WHEN WE
28 STARTED OUR RESEARCH, WE DEVELOPED VERY LENGTHY

1 QUESTIONNAIRES, SOME OF THEM 2- OR 300 ITEMS THAT WE
2 ADMINISTERED TO SEVERAL HUNDRED PEOPLE.

3 I ADMINISTERED A NUMBER OF THEM MYSELF AND
4 SUPERVISED OTHER STUDENTS THAT DID THAT. WE ALSO
5 ADMINISTERED PERSONALITY ASSESSMENT INSTRUMENTS TO SEE WHAT
6 KIND OF PEOPLE WERE IN THERE AND WHETHER OR NOT THEY HAD
7 CHANGED, THAT KIND OF THING.

8 I HAVE BEEN INVOLVED IN AS WELL IN WHAT WE
9 WOULD CALL MORE OPEN-ENDED INTERVIEW SITUATIONS WHERE I
10 WOULD VISIT COMMUNAL NEW RELIGIOUS GROUPS OR ORGANIZATIONAL
11 HEADQUARTERS EITHER HERE OR IN EUROPE, TALKED TO MEMBERS AND
12 LEADERS IN A MORE INFORMAL BASIS WITHOUT HAVING A STRUCTURED
13 QUESTIONNAIRE TO FOLLOW.

14 I HAVE ALSO BEEN INVOLVED IN CONTENT ANALYSIS
15 OF THE MATERIALS PUT OUT BY A NUMBER OF THESE KINDS OF
16 GROUPS. AND HAVE ALSO, AS YOU MIGHT EXPECT, VERY CAREFULLY
17 TRIED TO KEEP ABREAST OF ALL THE LITERATURE IN THE AREA OF
18 NEW RELIGION. SO I FEEL LIKE I KNOW SOMETHING ABOUT AT
19 LEAST A FEW OF THEM.

20 Q IN PREPARATION FOR YOUR TESTIMONY TODAY, WHAT,
21 IF ANY, MATERIALS HAVE YOU REVIEWED?

22 A WELL, I HAVE A LIST HERE IF I CAN FIND IT.
23 SHALL I JUST READ THE LIST?

24 Q WHY DON'T YOU DO THAT.

25 A ALL RIGHT. THIS IS A LIST OF THINGS THAT I
26 READ THAT SPECIFICALLY DEAL WITH THE CHURCH UNIVERSAL AND
27 TRIUMPHANT THAT WERE SENT TO ME BY YOURSELF OR OTHERS.

28 "A WAY OF LIFE, THE CODE OF CONDUCT FOR

1 STUDENTS AT SUMMIT UNIVERSITY." I ALSO READ THE ORIENTATION
2 RULES FOR SUMMIT UNIVERSITY.

3 I READ AN ARTICLE FROM PEOPLE MAGAZINE FROM 7-1
4 OF '85 AND I READ A REPLY TO THAT ARTICLE FROM MR. FRANCIS
5 DATED 6-25 OF '85.

6 I READ A HANDBOOK FOR PARENTS THAT IS
7 ASSOCIATED WITH THE MONTESSORI INTERNATIONAL LOWER SCHOOL.
8 PLEDGE FOR TRUSTEE OF SUMMIT LIGHTHOUSE STUDY GROUP.

9 I LISTENED TO A TAPE CASSETTES OF DECREES THAT
10 WERE SENT TO ME. I HAVE READ A NUMBER OF COPIES OF VARIOUS
11 INSERTS THAT INVOLVED DECREERING. COPIES OF A LARGE NUMBER
12 OF NEWSPAPER CLIPPINGS, WHICH I WAS HAPPY TO GET TO ADD TO
13 MY FILES.

14 I READ A TRANSCRIPT OF THE MEETING HELD JUNE
15 THE 6TH, 1980, BETWEEN ELIZABETH CLARE PROPHET, GREGORY
16 MULL, MONROE SHEARER AND EDWARD FRANCIS. I READ A NUMBER OF
17 LETTERS, SOME OF WHICH I HAVE WITH ME, BUT PROBABLY 2 DOZEN,
18 15 OR 20 -- I'D SAY 15 OR 20 LETTERS WRITTEN BY MR. MULL TO
19 ELIZABETH CLARE PROPHET OR OTHERS IN THE GROUP AND, IN FACT,
20 SOME TO, I THINK, HIS EX-WIFE.

21 I HAVE READ A VOW OF SERVICE BY MR. MULL ABOUT
22 COMPLIANCE OF MR. MULL. A DOCUMENT OF RESPONSIBILITY FOR
23 DAMAGE AND LOSS, ET CETERA, SIGNED BY MR. MULL.

24 I READ A VOLUME ENTITLED "MANTRAS OF THE
25 ASCENDED MASTERS," WHICH I THOUGHT WAS INTERESTING BECAUSE
26 IT HAD SOME OF MY OLD FAVORITE BAPTIST HYMNS IN IT.

27 I ALSO READ THE COMPLAINT AND CROSS-COMPLAINT
28 IN THIS CASE. I READ SOME TRANSCRIPTS OF EARLY PARTS OF

1 THIS TRIAL.

2 AND I HAVE LOOKED IN MY LIBRARY. I READ PARTS
3 OF SEVERAL BOOKS THAT TALKED A LITTLE BIT ABOUT THE CHURCH
4 UNIVERSAL AND TRIUMPHANT OR SOME OF ITS PREDECESSOR GROUPS
5 AND GROUPS THAT ARE RELATED TO IT.

6 THAT I THINK IS A FAIRLY EXHAUSTIVE LIST OF THE
7 KIND OF THINGS I READ SPECIFICALLY ABOUT THE CHURCH
8 UNIVERSAL AND TRIUMPHANT AND ITS PREDECESSOR GROUPS WITHIN
9 THAT TRADITION.

10 Q WHAT EXPERIENCE, IF ANY, DO YOU HAVE WITH
11 RESPECT TO CONVERSION AND RECRUITMENT TO NEW AGE RELIGIONS?

12 A WELL, THIS HAS ACTUALLY BEEN THE MAJOR FOCUS OF
13 MY WORK, AT LEAST INITIALLY. FOR THE FIRST SEVERAL YEARS I
14 AND SOME GRADUATE STUDENTS WERE FASCINATED BY THE FACT THAT
15 SOME OF THE BEST EDUCATED FOLKS IN AMERICA WERE CHOOSING NEW
16 RELIGIONS OVER GOING TO LAW SCHOOL OR MEDICAL SCHOOL OR
17 WHATEVER, AT LEAST TEMPORARILY, AND WE DECIDED TO EXAMINE
18 THE SOCIOLOGY LITERATURE, PSYCHOLOGY LITERATURE SEARCHING
19 FOR THEORIES OR MODELS, WE CALL THEM, TO EXPLAIN WHY THIS
20 WOULD HAPPEN, HOW IT WOULD WORK THAT HUNDREDS OF THOUSANDS
21 OF PEOPLE WOULD DECIDE TO EXPERIMENT ABOUT WITH NEW
22 RELIGIONS AND WHAT WE THOUGHT WAS A GROWING AGE OF
23 SECULARITY.

24 IT SEEMS A LONG TIME SINCE WE THOUGHT THAT, BUT
25 THERE IS REALLY ONLY ABOUT 10 OR 15 YEARS AGO THAT A LOT OF
26 PEOPLE WERE SURPRISED AT THE RISE OF INTEREST IN NEW
27 RELIGIONS.

28 Q HAVE YOU CONTINUED YOUR INVESTIGATIONS INTO

1 THAT AREA OVER THE LAST 10, 15 YEARS?

2 A YES, I HAVE. IN FACT, YOU MAY REMEMBER THAT
3 ONE OF THE PAPERS I READ IS I CONSIDER KIND OF A CULMINATING
4 THEORETICAL STATEMENT THAT WAS RECENTLY PUBLISHED CALLED
5 "THE ACTIVE VERSUS PASSIVE CONVERT." SO THAT AREA OF MY
6 STUDIES HAS CONTINUED OVER THE LAST 15 YEARS. IT'S BEEN THE
7 PRIMARY FOCUS, ALTHOUGH, AS I INDICATED, I HAVE STUDIED
8 OTHER THINGS AS WELL.

9 Q BASED ON YOUR RESEARCH AND STUDIES, WHAT
10 CONCLUSIONS, IF ANY, DID YOU REACH AS TO WHY PEOPLE JOINED
11 NEW AGE RELIGIOUS GROUPS?

12 A WELL, THE FIRST CONCLUSION THAT I AND MY
13 STUDENTS REACHED WAS ONE WE REACHED SOMEWHAT HESITANTLY. WE
14 DIDN'T NECESSARILY WANT TO. WE FOUND THESE THEORIES AND
15 THESE MODELS AND STARTED TRYING TO APPLY THEM TO THE NEW AGE
16 RELIGIONS AND WE FOUND THAT THEY DIDN'T WORK, THAT THEY
17 SIMPLY WOULDN'T FIT THE DATA.

18 AND THAT IS ALWAYS A DISQUIETING EXPERIENCE TO
19 A RESEARCHER WHEN THEY GO OUT AND DO RESEARCH WITH A THEORY
20 THEY HAVE FOUND AND IT DOESN'T WORK. BUT THAT WAS OUR
21 EXPERIENCE IN THIS CASE.

22 Q WHAT WERE THE THEORIES THAT WEREN'T WORKING?

23 A THE PROBLEM WITH THE THEORIES THAT WE
24 ENCOUNTERED IS THAT THEY MADE SOME ASSUMPTIONS ABOUT HUMAN
25 BEINGS, AND HOW THEY RELATE TO RELIGIOUS GROUPS AND HOW --
26 WHAT KIND OF PEOPLE THEY ARE.

27 THE BEST WAY TO SUM IT UP, IF I MIGHT, IS THAT
28 THE THEORIES MADE AN ASSUMPTION THAT THE PEOPLE BEING

1 CONVERTED TO RELIGIOUS ORGANIZATIONS WERE PASSIVE KIND OF
2 OBJECTS OR ENTITIES THAT WERE PUSHED AROUND BY SOCIAL FORCES
3 OVER WHICH THEY HAD NO CONTROL.

4 THOSE KINDS OF THEORIES WERE DEVELOPED OVER
5 PREVIOUS YEARS TYPICALLY BY PEOPLE WHO WERE STUDYING
6 RELIGIOUS ORGANIZATIONS THAT MAYBE DEALT WITH LOWER CLASS
7 GROUPS OR SOMETHING LIKE THAT AND THEY WERE TRYING TO
8 EXPLAIN WHAT THEY THOUGHT WAS STRANGE BEHAVIOR SO THOSE KIND
9 OF MODELS SEEMED TO HAVE SOME APPEAL, BUT THEY DID NOT FIT
10 THE CURRENT SITUATION.

11 BECAUSE WHAT WE KEPT ENCOUNTERING BECAUSE WE
12 WENT IN TO AND TALKED TO THEM AND INTERVIEWING THEM WAS
13 THESE PEOPLE WERE VERY MUCH IN CONTROL OF THEIR LIVES. THEY
14 WERE OUT LOOKING FOR NEW PURPOSE AND MEANING.

15 GRANTED MANY OF THEM HAD REJECTED THE STATUS
16 QUO OR THE PHILOSOPHY OF LIFE THAT THEIR PARENTS WOULD HAVE
17 LIKED FOR THEM TO HAVE OR SOMETHING OF THAT NATURE, BUT THEY
18 REJECTED -- BUT THEY WERE OUT LOOKING, THEY WERE OUT
19 SEARCHING, THEY WERE ACTIVE. THEY WERE NOT PASSIVE.

20 SOME OF THESE FOLKS WERE SOME OF THE BRIGHTEST
21 FOLKS I HAVE EVER ENCOUNTERED. AND I MUST SAY I WASN'T
22 NECESSARILY LOOKING FOR THAT OR EXPECTED IT, BUT THE DATA
23 JUST DIDN'T FIT.

24 Q DID YOU FIND A HIGH INCIDENCE OF THIS PERSON
25 WHO WAS SEARCHING AS OPPOSED TO PASSIVE PERSONALITY?

26 A YES. VIRTUALLY EVERY PERSON WE HAVE DONE
27 INTERVIEWS WITH OR HAD FILL OUT QUESTIONNAIRES OVER THE
28 YEARS OF MY STUDY, THE PEOPLE I HAVE ENCOUNTERED IN

1 ORGANIZATIONS HERE AND IN EUROPE, THEY FIT THIS PATTERN OF
2 AN ACTIVE KIND OF PERSON TRYING TO MAKE SENSE OUT OF THEIR
3 LIFE, AND DETERMINE WHERE THEY WANT TO GO IN THEIR LIFE AND
4 NOT BE PUSHED AROUND. QUITE THE REVERSE OF THE PASSIVE
5 PERSON.

6 Q WHAT IS THE — ANY SIGNIFICANCE DOES THE TERM
7 "NEGOTIATION" HAVE IN YOUR STUDY OF CONVERSION AND
8 RECRUITMENT?

9 A THAT IS WHAT YOU MIGHT CALL A SERENDIPIOUS
10 FINDING. YOU COME ON IT BY ACCIDENT. AND IT IS ALWAYS A
11 DELIGHT WHEN YOU ARE A RESEARCHER AND YOU FIND SOMETHING
12 THAT IS INTERESTING, POTENTIALLY VALUABLE AND YOU WEREN'T
13 LOOKING FOR IT.

14 WHAT WE ENCOUNTERED IN OUR STUDIES WERE A
15 NUMBER OF PEOPLE WHO WERE OPENLY INVOLVED IN NEGOTIATING
16 WITH GROUPS THAT THEY WERE THINKING OF PARTICIPATING IN.

17 ONE OF THE CONCEPTS THAT I HAVE DEVELOPED IN
18 PUTTING TO THE LITERATURE IS CALLED CONVERSION CAREERS. IT
19 IS MEANT TO REFER TO PEOPLE WHO GO FROM ONE GROUP TO
20 ANOTHER.

21 THEY GO TRY OUT ONE GROUP AND THEY DECIDE IT
22 DOESN'T QUITE FIT THEIR NEEDS SO THEY GO INTO ANOTHER AND
23 ANOTHER. AND WE HAVE GOT DATA ON PEOPLE THAT SOMETIMES WENT
24 THROUGH A HALF DOZEN DIFFERENT GROUPS OR SETS OF BELIEFS OR
25 PRACTICES.

26 AND IN THAT CONTEXT, WHAT WE QUITE OFTEN RAN
27 INTO WERE PEOPLE WHO WERE OVERTLY NEGOTIATING WITH GROUPS AS
28 TO WHAT DO I HAVE TO DO TO BE A MEMBER OF THIS GROUP? DO I

1 HAVE TO GIVE UP THIS, THAT OR THE OTHER? WHAT CAN I GET OUT
2 OF IT? THAT WAS A VERY COMMON KIND OF THING WE ENCOUNTERED.

3 Q IN THE MATERIALS YOU REVIEWED REFERRING TO THIS
4 CASE, DID YOU FIND ANY INDICATIONS THAT MR. MULL NEGOTIATED
5 WITH CHURCH UNIVERSAL AND TRIUMPHANT IN THE WAY YOU HAVE
6 DISCUSSED?

7 A YES, I DID. IN FACT, I WAS QUITE SURPRISED
8 WHEN SENT THIS SET OF LETTERS BECAUSE THEY SEEMED TO BE A
9 CLASSIC ILLUSTRATION OF THE KIND OF THING WE ENCOUNTERED ON
10 A REGULAR BASIS IN A NUMBER OF OTHER GROUPS.

11 I HAVE STUDIED SOME GROUPS IN VERY GREAT
12 DETAIL. I HAVE STUDIED PROBABLY AT LEAST A DOZEN DIFFERENT
13 GROUPS IN SOME DETAIL THAT INVOLVED SOME RESEARCH I HAVE
14 DONE.

15 THIS ACTUALLY REPRESENTS ONE OF THE MOST
16 COMPLETE DATA SETS I HAVE SEEN BECAUSE IN MOST INSTANCES
17 PEOPLE WERE NOT SO PRONE TO WRITE THINGS DOWN. THEY WERE
18 ORAL DISCUSSIONS. THEY WOULD HAVE CONVERSATIONS WITH
19 PEOPLE. SOMETIMES FORMAL, SOMETIMES INFORMAL. TYPICALLY
20 INFORMAL, AS A MATTER OF FACT, WITH NOBODY TAKING NOTES.
21 AND IF IT DIDN'T WORK OUT, THEN SOMEBODY WOULD MOVE ON.

22 MR. MULL HAS SHOWN A REAL TENDENCY TO WRITE
23 THINGS DOWN. AND THE LETTERS THAT I REVIEWED -- I HAVE GOT
24 THREE OR FOUR OF THEM HERE THAT IF YOU WANTED, I COULD QUOTE
25 FROM THEM TO ILLUSTRATE THE POINT I AM TRYING TO MAKE.

26 Q WHY DON'T YOU BRIEFLY DO THAT, PLEASE.

27 THE COURT: FIRST OF ALL, JUST FOR THE RECORD, WHY
28 DON'T YOU PLEASE GIVE US THE DATES OF THE THREE OR FOUR,

1 HOWEVER MANY LETTERS YOU HAVE.

2 THE WITNESS: I CERTAINLY WILL, YOUR HONOR. THESE
3 DON'T HAVE EXHIBIT NUMBERS, BUT I CAN GIVE THE DATES ON
4 THEM.

5 THE COURT: THAT WOULD BE APPRECIATED.

6 THE WITNESS: I BROUGHT FOUR OF THESE LETTERS UP HERE
7 NOT BECAUSE THEY WERE THE ONLY ONES THAT MADE THE POINT, BUT
8 BECAUSE THEY MADE THE POINT BETTER. I HAD A COUPLE OF DOZEN
9 THAT I HAD MARKS IN, BUT THEY GO OVER THE TIME PERIOD OF
10 THIS EPISODE.

11 THE FIRST ONE THAT I NOTED WAS OCTOBER 17TH,
12 1974, WHICH I THINK MAY HAVE BEEN ONE OF THE FIRST LETTERS
13 THAT MR. MULL WROTE TO ELIZABETH CLARE PROPHET. THE LETTER
14 DOES AN INTERESTING THING. IT STARTS OUT WITH PHRASES OF
15 ADULATION. SAYS: (READING.)

16 "YOU PREPARED A FOUR-DAY
17 BANQUET FOR ME AT THE CONFERENCE AND I COULD
18 NOT DO OTHER THAN SAY THANK YOU FROM MY
19 HEART FOR AN ABUNDANCE OF PRECIOUS
20 DISCOVERY."

21 THEN LATER IN THE LETTER, THERE IS AN
22 INTERESTING MENTION THAT UNLESS -- WELL, IT FIRST CAUGHT ME
23 UNAWARES. IT SAYS: (READING.)

24 "I AM AN ARCHITECT AND HAVE A
25 WISH TO HELP YOU WITH YOUR ARCHITECTURAL
26 NEEDS IN THE FUTURE. LET IT WORK OUT IN THE
27 INNER PLANES FOR NOW."

28 THAT WAS THE FIRST MENTION I AM AWARE OF IN THE

1 LETTERS I READ OF MR. MULL OFFERING TO BECOME THE DESIGNER
2 OR THE ARCHITECT FOR THE GROUP. AND THERE IS AN INTERESTING
3 JUXTAPOSITION OF THAT IN THE LETTER WITH SOME PHRASES OF
4 ADULATION AND WHATNOT.

5 THEN I NEXT PICKED OUT AS AN EXAMPLE THE
6 SEPTEMBER 22ND, 1975, LETTER TO, I THINK THE NAME IS,
7 RANDALL KING WHERE MR. MULL HAS GOTTEN VERY UPSET.

8 AND THIS IS A KIND OF LETTER, BY THE WAY, THAT
9 CERTAINLY DEMONSTRATES WHAT I AM TALKING ABOUT IN TERMS OF
10 AN ACTIVE KIND OF CONVERT. THIS IS A PERSON WHO IS ENGAGED
11 IN ARGUMENT HERE AND CERTAINLY TAKING A VERY POSITIVE ACTIVE
12 ROLE.

13 HE SAYS AND JUST -- I WON'T READ THE WHOLE
14 LETTER UNLESS YOU WANT ME TO, BUT I HAVE MARKED SOME
15 SENTENCES. I THINK IT PROBABLY HAS BEEN ENTERED INTO THE
16 RECORD.

17 THE COURT: THAT IS OKAY.

18 THE WITNESS: IT SAYS: (READING.)

19 "I AM NOT THAT MASOCHISTIC THAT
20 I WOULD LET YOU MAKE ME A SLAVE FOR YOUR
21 DOMINATION AND CONTROL," ON ONE PAGE.

22 THEN IT SAYS, "OF MANY YOU HAVE
23 FALLEN SHORT OF ASCENDED MASTER BEHAVIORS.
24 I READ THOSE WORKS. WHAT EMPIRE YOU ARE
25 BUILDING IS AN ATTITUDE FOR YOURSELF OR OF
26 GOD?"

27 ON THE NEXT PAGE, "AS OF THE
28 DAY YOU SO INDISCREETLY PLACED YOUR

1 HOSTILITY ON MY DICTAPHONE TAPE, I HAVE
2 WITHDRAWN FROM ALL LOCAL ACTIVITIES AND HAVE
3 SO STATED WHY."

4 THAT IS A CLASSIC STATEMENT OF SOMEONE
5 THREATENING WITHDRAWAL IF CONDITIONS AREN'T MET.

6 ON THE NEXT PAGE, "TILL THEN I
7 HAVE WITHDRAWN MY ENERGIES AND TIME FROM THE
8 ORGANIZATION, BUT NOT THE TECHNIQUES."

9 SO THERE IS A LITTLE BIT OF A QUALIFIER THERE.
10 AND THEN THE VERY LAST SENTENCE IN THE LETTER SAYS, "I DO
11 HOPE THIS CAN BE RESOLVED."

12 THAT IS ACTUALLY A VERY -- I THINK A VERY
13 BRILLIANTLY WRITTEN LETTER OF NEGOTIATION. I REFER TO IT AS
14 A GOOD ILLUSTRATION OF NEGOTIATION INSTRUMENT.

15 THE FEBRUARY -- THEN WE MOVE FORWARD IN TIME.
16 FEBRUARY 22ND, 1979, IS THE LETTER I AM REFERRING TO. IT IS
17 A LETTER TO BELOVED MOTHER AND BOARD OF DIRECTORS.

18 IS THERE A -- ANY WATER? I MAY GET A BIT
19 THIRSTY.

20 STARTS OUT: (READING.)

21 "I AM WRITING TO YOU TO LET YOU
22 KNOW I FEEL I AM IN MY RIGHT PLACE HERE
23 DOING THAT WHICH I LOVE TO DO MOST," I THINK
24 THIS IS A VERY REVEALING COMMENT, "THAT
25 WHICH I LOVE TO DO MOST, WHICH IS DOING
26 ARCHITECTURE. I HAVE A GOOD FEELING ABOUT
27 WHAT COULD BE IF I DESIGN FOR CAMELOT," AND
28 IT GOES ON.

1 THEN AT THE BOTTOM OF THAT FIRST PAGE, HE
2 STARTS TALKING ABOUT -- "THANK YOU VERY MUCH." SOME VERY
3 OVERT NEGOTIATING ASPECTS. HE SAYS: (READING.)

4 "I SAID I COULD ONLY COME AT
5 ONCE IF MY MONTHLY BILLS WERE MET, WHICH
6 RUNS ABOUT \$2,000 PER MONTH."

7 SO HE NAMES AN AMOUNT. THAT IS THE FIRST TIME
8 I AM AWARE HE NAMES AN AMOUNT IN THE LETTER. I NOTED IN
9 LATER LETTERS THAT THE AMOUNT JUMPS TO 4- OR \$5,000 PER
10 MONTH IT TURNS OUT WHAT HE NEEDS. BUT THE FIRST TIME HE
11 NAMES AN AMOUNT, IT IS A RELATIVELY LOW FIGURE, \$2,000.

12 AND HE ALSO SAYS IN THE SAME PARAGRAPH, AND I
13 KNOW THIS HAS BEEN AN IMPORTANT ISSUE OF CONTENTION HERE, HE
14 SAYS: (READING.)

15 "I HAVE DEFINITELY DECIDED TO
16 PUT MY HOME ON THE MARKET FOR SALE THIS
17 SUMMER."

18 AND THEN HE GOES ON, AS YOU RECALL -- I THINK
19 THIS LETTER HAS BEEN DISCUSSED HERE -- TALKING ABOUT:

20 "I WILL GIVE YOU TEN PERCENT OF
21 ALL PROFIT I MAKE FROM THE SALE OF MY
22 PROPERTY."

23 SO HE IS TRYING TO GET A COMMITMENT TO BILLS
24 THAT HE HAS TO PAY IN THE AMOUNT OF \$2,000 AND HE IS
25 OFFERING TO COME UP WITH SOME KIND OF REIMBURSEMENT. THIS
26 WHOLE PARAGRAPH -- I DON'T KNOW IF I NEED TO READ IT ALL,
27 BUT HE SAYS:

28 "FROM THAT POINT ON, I CAN

1 REDUCE THE SUM APPROXIMATELY 2,000 PER MONTH
2 TO 700 PER MONTH."

3 SO HE SAYS HE IS GOING TO BE ASKING FOR LESS IN
4 THE FUTURE. 700 PER MONTH. THEN DOWN AT THE BOTTOM OF THAT
5 PAGE, HE FINALLY SAYS:

6 "MY CURRENT EMERGENCY OF
7 NEEDING \$4,276.76 IS BECAUSE MY APPLICATION
8 TO INCREASE MY PRESENT MORTGAGE WAS DECLINED
9 AS I HAD INCREASED IT \$20,000 LAST YEAR."

10 SO THAT LETTER CLEARLY ILLUSTRATES AGAIN THAT
11 HE IS INVOLVED IN SOME PRETTY STRAIGHTFORWARD NEGOTIATION.
12 THIS IS A VERY RATIONAL LETTER.

13 THE LAST ONE I WOULD REFER TO, I THINK THE
14 COURT HAS ALSO TALKED ABOUT, IS THE APRIL 20TH LETTER, 1980,
15 TO BELOVED MOTHER. HE STARTS OUT WITH AGAIN WHAT I HAVE
16 REFERRED TO AS ADULATION OR ADORATION. (READING.)

17 "I THANK YOU FOR STOPPING ME ON
18 THE CAMPUS ON A FEW OCCASIONS AND ESPECIALLY
19 RECENTLY WHEN YOU ASKED ME IF YOU COULD MAKE
20 CALLS FOR ME AND IF EVERYTHING WAS ALL
21 RIGHT. I ALSO THANK YOU FOR YOUR LAST VISIT
22 WHEN YOU RECOMMENDED I TAKE BACK A LOAN ON
23 MY HOME IF I NEED TO SELL IT AND THAT YOU
24 WOULD MAKE CALLS FOR ME FOR IT TO BE SOLD."

25 HE STARTS OUT THAT WAY. AND THEN DOWN AT THE
26 BOTTOM OF THAT PAGE, HE STARTS TALKING ABOUT THE \$4,000 PER
27 MONTH PROBLEM THAT HE HAS WITH HIS CURRENT OBLIGATIONS.
28 THEN THIS -- SOME OF THE MOST TELLING PHRASEOLOGY IN THE

1 LETTER IS ON PAGE THREE WHERE HE SAYS: (READING.)

2 "THIS EXPERIENCE AT CAMELOT HAS
3 TAUGHT ME TO TURN TO THE MASTERS ALWAYS, BUT
4 ALSO TO BE PRACTICAL AND LOOK OUT FOR MY OWN
5 FUTURE AGE AND ALL CONSIDERED. ALSO, I AM
6 HOPING THAT IN EIGHT YEARS WE WILL GET THE
7 GOLDEN AGE STARTED AND I MIGHT SLOW DOWN
8 JUST A BIT."

9 BUT HE IS SAYING THERE HE IS LOOKING OUT FOR
10 HIS OWN FUTURE. IN THE NEXT PARAGRAPH HE SAYS: (READING.)

11 "I MUST EXERCISE MY FREE WILL
12 TO OWN PROPERTY TO SPONSOR MY DAUGHTER AND
13 PROVIDE FOR MY OLD AGE IN THE EVENTUALITY
14 YOU WOULD NOT NEED ME AT CAMELOT OR IF I
15 BECAME ILL AND COULD NOT WORK."

16 SO HE IS STRESSING THERE HIS USE OF HIS OWN
17 FREE WILL. THEN HE STARTS GOING INTO THE DISCUSSION OF HOW
18 MUCH HE IS GOING TO SELL HIS HOUSE FOR, AND THAT IT IS LESS
19 AND HE SAID HE MADE HIS EARLIER AGREEMENTS ON THE BASIS THAT
20 HE COULD PAY BACK ALL THE MONEY IF IT SOLD FOR \$240,000.

21 AND NOW HE IS STARTING TO BACK OFF OF THAT AND
22 I THINK THE RECORD SHOWS IN A PLACE OR TWO THAT MR. MULL MAY
23 NOT HAVE -- MAY HAVE SIGNED THOSE EARLIER DOCUMENTS WITHOUT
24 THE INTENTION.

25 THAT IS ANOTHER ILLUSTRATION OF THE KIND OF
26 NEGOTIATION THAT HE WOULD PERHAPS SIGN THE DOCUMENT WITHOUT
27 THE INTENTION OF ABIDING BY IT. THEN HE ON PAGE FOUR, AS
28 YOU RECALL, STARTS TALKING ABOUT HE WILL OFFER \$10,000 TO

1 SETTLE ALL CLAIMS AGAINST HIM AND HE OFFERS TO PAY 7,000
2 IMMEDIATELY, 3,000 IN JUNE. HE SAYS THIS: (READING.)

3 "I DO NOT FEEL, BUT I ASK FOR
4 YOU TO MAKE THAT FINANCIAL COMMITMENT NULL
5 AND VOID BY CALLING IT SALARY OR INDEPENDENT
6 CONTRACTOR PAYMENT OR A FORGIVENESS OF
7 DEBT."

8 SO HE IS OFFERING SEVERAL ALTERNATIVES THERE TO
9 ELIZABETH CLARE PROPHET IN TERMS OF HOW THEY MIGHT DECIDE
10 WHAT THE VOIDED DEBT WOULD BE CALLED OR REFERRED TO. SOME
11 OF THOSE, OF COURSE, HAVE VARIOUS IMPLICATIONS.

12 THEN HE GOES INTO THE LAST PAGE OF THIS LETTER
13 ON PAGE FIVE BY POINTING OUT SOME THINGS HE'S DONE FOR THE
14 GROUP IN TERMS OF CONTACTS WITH OTHER PEOPLE AND GETTING
15 THEM TO COME AND MAKE PLEDGES AND THINGS. HE CLOSSES THAT
16 PAGE BY SAYING BLUNTLY: (READING.)

17 "I AM PREPARED TO GIVE YOU
18 \$10,000 AS MY TOTAL PAYMENT TO YOU, BUT ALL
19 COMMITMENTS IN THE PAST WILL HAVE TO BE
20 WAIVED."

21 THAT AGAIN IS A VERY RATIONAL STATEMENT AND
22 ILLUSTRATES THE KIND OF THING I WAS TALKING ABOUT PERHAPS
23 BETTER THAN I HAVE EVER SEEN, AS A MATTER OF FACT, THE
24 NEGOTIATING THAT SOMETIMES GOES ON BETWEEN PEOPLE WHO ARE
25 CONSIDERING BEING IN A GROUP OR CONSIDERING DOING THINGS FOR
26 A GROUP.

27 I AM SORRY TO TAKE SO LONG BUT --

28 Q BY MR. KLEIN: DURING THE COURSE OF HER

1 TESTIMONY, MARGARET SINGER LISTED SIX CHARACTERISTICS OF A
2 THOUGHT REFORM PROGRAM. VERY BRIEFLY, I WILL GO OVER THOSE
3 CHARACTERISTICS.

4 FIRST IS YOU NEED TO GET CONTROL OVER THE
5 PERSON'S SOCIAL AND/OR PHYSICAL ENVIRONMENT, HAVE TO GET
6 CONTROL OVER THEIR TIME.

7 SECOND ONE IS YOU HAVE TO CREATE A SENSE OF
8 POWERLESSNESS IN THE PERSON.

9 THIRD ONE IS THAT THE MANAGEMENT HAS TO
10 MANIPULATE THE REWARDS, PUNISHMENTS IN ORDER TO INFLUENCE
11 THE PEOPLE TO SUPPRESS THEIR OLD BEHAVIOR.

12 THE NEXT ONE IS MANAGEMENT HAS TO MANIPULATE
13 REWARDS, EXPERIENCES AND PUNISHMENTS IN ORDER TO ELICIT NEW
14 BEHAVIOR.

15 THE FIFTH CHARACTERISTIC IS THAT THE PERSON
16 BEING REFORMED HAS TO BE UNAWARE THAT IT IS BEING DONE TO
17 THEM.

18 AND THE SIXTH CHARACTERISTIC IS IT HAS TO BE
19 DONE WITHIN A CLOSED SYSTEM OF LOGIC WHERE THERE IS NO
20 COMPLAINT UPWARD TO MANAGEMENT, NO MODIFICATION OF THE
21 SYSTEM.

22 MY QUESTION TO YOU IS WHAT EFFECT, IF ANY, IN
23 YOUR OPINION WOULD THESE CHARACTERISTICS HAVE ON AN ENTIRE
24 GROUP, EVEN ASSUMING THAT THE CHARACTERISTICS WERE PRESENT?

25 MR. LEVY: YOUR HONOR, I AM GOING TO OBJECT AT THIS
26 POINT. AT THIS POINT WE HAVE NOT ESTABLISHED THIS MAN'S
27 CREDENTIALS AS AN EXPERT IN THE FIELD OF THOUGHT REFORM. I
28 WOULD LIKE TO ASK A FEW QUESTIONS ON VOIR DIRE.

1 THE COURT: ALL RIGHT.

2

3 VOIR DIRE EXAMINATION +

4 BY MR. LEVY:

5 Q DR. RICHARDSON, ARE YOU RECOGNIZED BY ANY BOARD
6 OR ANY INTELLECTUAL GROUP IN THIS COUNTRY AS AN EXPERT ON
7 THOUGHT REFORM?

8 A I HAVE PUBLISHED ARTICLES THAT DEAL WITH THE
9 THOUGHT REFORM MODEL, WHICH MEANS THAT THEY HAVE PASSED THE
10 REFEREEING PROCESS THAT IS USED BY PROFESSIONAL JOURNALS
11 THAT I HAVE DESCRIBED EARLIER.

12 I ALSO -- I GUESS YOU WOULD HAVE TO SAY I AM
13 RECOGNIZED BY THE AMERICAN PSYCHIATRIC ASSOCIATION TO THE
14 EXTENT THAT THOSE IN CHARGE OF DEVELOPING THE PUBLICATION
15 THAT IS PLANNED THIS YEAR ON CULTS AND NEW RELIGIONS SAW FIT
16 TO INVITE ME TO CONTRIBUTE AN ARTICLE TO THAT IN WHICH I
17 WILL BE DISCUSSING SOME OF THOSE MODELS.

18 I ALSO HAVE WRITTEN A CHAPTER --

19 Q EXCUSE ME, DOCTOR.

20 A I AM SORRY.

21 Q I DON'T MEAN TO BE RUDE, BUT ALL THAT WAS VERY
22 NICE, BUT BACK TO THE QUESTION.

23 ARE YOU RECOGNIZED BY ANY MEDICAL OR
24 PSYCHOLOGICAL OR INTELLECTUAL GROUPS IN THIS COUNTRY AS AN
25 EXPERT IN THE FIELD OF THOUGHT REFORM?

26 MR. KLEIN: I WOULD OBJECT. I THINK HE'S ANSWERED
27 THAT QUESTION. COUNSEL IS SUGGESTING IT HASN'T BEEN
28 ANSWERED.

1 THE COURT: HE CAN ANSWER.

2 THE WITNESS: WELL, ONE RESPONSE I HAVE IS I AM NOT
3 AWARE THAT ANY GROUP LICENSES EXPERTS IN THOUGHT REFORM. IF
4 YOU ARE ASKING IF I AM A LICENSED PSYCHIATRIST, I AM NOT. I
5 INDICATED THAT I AM A PH.D. IN SOCIOLOGY WITH A EMPHASIS ON
6 SOCIAL PSYCHOLOGY.

7 MY AREA OF INTEREST IN CONVERSION MODELS AND
8 THE PROCESS WHEREBY PEOPLE JOIN OBVIOUSLY LED ME TO
9 PUBLISH -- TO DO RESEARCH IN THAT AREA.

10 AND, IN FACT, I THINK I DID PUBLISH THE FIRST
11 ARTICLES IN A REFEREE JOURNAL IN 1972 ENTITLED "THOUGHT
12 REFORM IN THE JESUS MOVEMENT." I THINK THAT IS THE FIRST
13 SUCH USE OF THE MODEL IN THE REFEREE JOURNAL IN THE FIELD OF
14 THE BEHAVIORAL SCIENCES.

15 Q BY MR. LEVY: THE REASON I ASK YOU THE
16 QUESTION, DOCTOR, IS A NUMBER OF WITNESSES WHO HAVE
17 TESTIFIED FOR THE CHURCH IN THIS CASE SEEM TO HAVE MADE
18 REFERENCE TO A TEXT BY A DR. LIFTON.

19 ARE YOU FAMILIAR WITH HIS TEXT?

20 A YES.

21 Q NOW, WOULD IT BE A FAIR STATEMENT TO SAY THAT
22 HE IS A RECOGNIZED EXPERT IN THE FIELD OF THOUGHT REFORM?

23 A WELL, HE IS THE ONE THAT PUT THE WORD IN THE
24 LITERATURE, YES.

25 Q NOW, ARE THERE ANY BODIES -- EDUCATIONAL,
26 SCIENTIFIC, MEDICAL, INTELLECTUAL OR OTHERWISE -- THAT
27 INCLUDE YOU IN THE SAME CAPACITY AS THEY DO DR. LIFTON?

28 MR. KLEIN: I AM GOING TO OBJECT TO THIS. IT IS NOT

1 ONLY VAGUE AND AMBIGUOUS, IT IS TOTALLY IRRELEVANT.

2 THE COURT: SUSTAINED ON THE FIRST GROUND.

3 Q BY MR. LEVY: DOCTOR, YOU HAVE TOLD US THAT YOU
4 INTEND TO PUBLISH A PAPER IN THE NEAR FUTURE.

5 IS THERE ANY DOCUMENT THAT YOU HAVE PUBLISHED
6 TO DATE THAT HAS BEEN ACCEPTED BY THE MEDICAL AND SCIENTIFIC
7 COMMUNITY THAT IS HELD OUT TO BE THE MODEL FOR THOUGHT
8 REFORM PROGRAMS?

9 A HELD OUT TO BE A MODEL FOR THOUGHT REFORM
10 PROGRAMS? I -- THE WAY THAT THE SCIENTIFIC COMMUNITY
11 OPERATES IS THAT PEOPLE DEVELOP THEORIES OR MODELS AND OTHER
12 PEOPLE TEST THEM.

13 IF THEY -- IF THEY TEST THEM AND WRITE UP THE
14 RESULTS IN A PAPER AND SUBMIT IT TO A JOURNAL, THEN THE WAY
15 THE COMMUNITY OPERATES, THE SCIENTIFIC COMMUNITY, IS THAT
16 THAT CONTRIBUTION IS REFEREED.

17 IF IT IS FOUND WANTING, THEN IT IS REJECTED.
18 IF IT IS NOT FOUND WANTING, THEN IT IS PUBLISHED. AND
19 INDEED I HAVE PUBLISHED SEVERAL ARTICLES WHERE I DISCUSS
20 THOUGHT REFORM MODELS.

21 SO I -- I THINK THAT THERE IS A COMMUNITY OF
22 PEOPLE OUT THERE GENERALLY KNOWN AS REFEREES OR PROFESSIONAL
23 JOURNALS IN THE AREA OF PSYCHOLOGY AND SOCIOLOGY THAT
24 ACCEPTS MY WORK.

25 Q IS MY UNDERSTANDING CORRECT THEN IF SOMEBODY
26 PUBLISHES SOMETHING ABOUT THOUGHT REFORM, THEY ARE
27 AUTOMATICALLY A THOUGHT REFORM EXPERT?

28 A NO. PEOPLE CAN PUBLISH THINGS IN ALL KINDS OF

1 AREAS AND CALL THEM ANYTHING THEY LIKE. IF THEY HAVE NOT
2 FOLLOWED THE VERY RIGOROUS REFEREEING PROCESS, THEY WOULD
3 HAVE NO PREROGATIVES TO CALL THEMSELVES AN EXPERT ABOUT
4 ANYTHING.

5 Q WELL, LET ME ASK YOU FOR YOUR EXPERT OPINION.
6 IN YOUR OWN OPINION, ARE YOU AN ACKNOWLEDGED
7 THOUGHT REFORM EXPERT?

8 A YES, I AM.

9 MR. LEVY: THANK YOU, DOCTOR.

10 THE COURT: PROCEED.

11 MR. KLEIN: THANK YOU.

12

13 DIRECT EXAMINATION + (RESUMED)

14 BY MR. KLEIN:

15 Q DOCTOR, MY QUESTION WAS -- AND I WON'T READ THE
16 SIX CHARACTERISTICS AGAIN THAT WE HAVE BEEN TOLD THOSE ARE
17 THE SIX CHARACTERISTICS OF A THOUGHT REFORM PROGRAM.

18 BASED ON YOUR EDUCATION, YOUR EXPERIENCE, WHAT
19 EFFECT, IF ANY, WOULD THOSE CHARACTERISTICS HAVE ON AN
20 ENTIRE GROUP EVEN ASSUMING FOR THE MOMENT THAT THOSE SIX
21 CHARACTERISTICS WERE PRESENT?

22 A WELL, GIVEN THE TESTIMONY, I MIGHT QUESTION
23 SOME OF THOSE. BUT GIVEN YOUR HYPOTHETICAL THAT THEY WOULD
24 EXIST, I WOULD SAY THAT TRYING TO FIND THE SITUATION IN
25 WHICH THEY WOULD OPERATE WOULD BE EXTREMELY DIFFICULT ON THE
26 GROUP LEVEL BECAUSE OF THE VERY FACT THAT YOU ARE TALKING
27 ABOUT A GROUP.

28 WHEN YOU COME INTO ONE OF THESE NEW AGE

1 RELIGIONS, FOR INSTANCE, AND YOU START GETTING DATA ON WHERE
2 THEY COME FROM, THEY COME FROM MANY DIFFERENT PLACES, THEY
3 WERE RAISED IN DIFFERENT PARTS OF THE COUNTRY, THEY HAD
4 DIFFERENT RELIGIOUS BACKGROUNDS, THERE ARE DIFFERENT RACIAL
5 GROUPS, THEY HAVE MANY DIFFERENT EXPERIENCES.

6 YOU BRING THAT KIND OF HETEROGENATE TOGETHER IN
7 ONE GROUP AND YOU JUST DON'T HAVE THE KIND OF SITUATION
8 THERE WHERE YOU WOULD SEE SOME KIND OF GROUP PHENOMENON THAT
9 YOU MIGHT REFER TO AS GROUP THOUGHT REFORM.

10 THE ONLY SITUATION IN WHICH I WOULD THINK THAT
11 WOULD BE POSSIBLE IN ITS ENTIRETY WOULD BE SOMETHING LIKE A
12 PRISON, FOR INSTANCE, WHERE YOU DID HAVE TOTAL CONTROL OVER
13 SOMEONE 24 HOURS A DAY, THEY COULDN'T LEAVE, THEY COULDN'T
14 CONTACT OUTSIDE WORLD AND WHATNOT.

15 WHAT HAPPENS IN THESE GROUPS, IF I CAN
16 ELABORATE JUST A LITTLE BIT MORE, IS THAT THE SOCIAL
17 PSYCHOLOGICAL LITERATURE ON CONFORMITY DEMONSTRATES THAT IF
18 YOU GET PEOPLE IN A GROUP THAT HAVE SOME DIFFERENCES OF
19 OPINION AND THOSE GET EXPRESSED, WHICH THEY WOULD BE WANT TO
20 DO, THAT ALL IT TAKES, FOR INSTANCE, IN A GROUP TO SHATTER
21 THE WHOLE KIND OF MILIEU OR ATMOSPHERE WOULD BE ONE PERSON
22 TAKING ONE ISSUE OR SAYING, "I DON'T REALLY ACCEPT THAT KIND
23 OF PERSPECTIVE."

24 AND WHAT I HAVE FOUND IN THE RESEARCH THAT I
25 HAVE DONE IS THAT EVERY GROUP HAS THOSE KINDS OF PEOPLE.
26 EVERY GROUP HAS FOLKS THAT ARE COMING IN, AND THEY ARE NOT
27 QUITE COMMITTED OR THEY ARE ON THEIR WAY OUT BECAUSE IT
28 REALLY WASN'T THE RIGHT THING FOR THEM.

1 ROB BALCH DID A VERY INTERESTING STUDY WITH
2 U.F.O. CULT WHERE HE FOUND SOME PEOPLE, WHO HE CALLED IT
3 ROLE PLAYING, ANOTHER SOCIO --

4 MR. LEVY: I AM GOING TO OBJECT AT THIS TIME, YOUR
5 HONOR. HEARSAY AS TO WHOEVER THIS PERSON IS WHO WAS
6 MENTIONED.

7 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

8 Q BY MR. KLEIN: OTHER THAN THAT ARTICLE, HAVE
9 YOU SAID EVERYTHING THAT YOU HAVE INTENDED TO SAY AS FAR AS
10 WHAT EFFECT, IF ANY, THE SIX CHARACTERISTICS WOULD HAVE ON A
11 GROUP?

12 A WELL, THE ONLY THING I CAN SAY IS I HAVE
13 VISITED COMMUNAL RELIGIOUS GROUPS FROM A NUMBER OF DIFFERENT
14 TRADITIONS, BOTH IN AMERICA AND IN EUROPE. I HAVE LIVED
15 WITH THEM FOR LENGTHS OF PERIOD. I HAVE HAD STUDENTS DO THE
16 SAME THING AND WE HAVE SIMPLY NEVER SEEN IT HAPPEN IN THE
17 WAY YOU DESCRIBED YOUR HYPOTHETICAL.

18 THEY ARE ALWAYS DIFFERENT KINDS OF PEOPLE
19 COMING FROM DIFFERENT LOCATIONS. THEY ARE JUST NOT THE
20 REQUIRED HOMOGENATE AND NOT THE REQUIRED CONTROL TO PULL IT
21 OFF.

22 Q WHAT DOES THE TERM "RECONSTRUCTION OF
23 BIOGRAPHY" MEAN?

24 A THAT IS A TERM THAT HAS A LOT OF CREDENCE IN
25 THE SOCIOLOGICAL DISCIPLINE. IT REFERS TO THE GENERAL
26 TENDENCY FOR PEOPLE TO RECONSTRUCT OR REINTERPRET WHAT HAS
27 HAPPENED TO THEM IN THE PAST IN TERMS OF THEIR PRESENT KIND
28 OF EXPERIENCE, THE CONTEXT THAT THEY ARE IN NOW.

1 Q ARE THERE DIFFERENT TYPES OF RECONSTRUCTION OF
2 BIOGRAPHY IN THE SOCIOLOGICAL LITERATURE?

3 A YES, THERE ARE. WHILE IT IS A GENERAL TENDENCY
4 THAT IS TALKED ABOUT IN WRITINGS LIKE PETER BERGER'S BOOKS
5 "SOCIOLOGY OF RELIGION," FOR INSTANCE, THERE IS SOME
6 ATTENTION PAID TO SPECIAL TYPES OF THAT THAT ARE REFERRED TO
7 AS ACCOUNTS IN THE LITERATURE.

8 IT BECOMES A TECHNICAL TERM IN THE SOCIOLOGY
9 LITERATURE THAT TWO PARTICULAR TYPES OF THOSE ACCOUNTS THAT
10 ARE WORTH TALKING ABOUT, I THINK IN THE CONTEXT OF WHAT THIS
11 TRIAL IS ABOUT, ONE IS AN EXCUSATORY ACCOUNT AND THE OTHER
12 IS CALLED A JUSTIFICATION KIND OF ACCOUNT WHERE PEOPLE
13 EXCUSE THEMSELVES FOR PAST BEHAVIOR ARE JUSTIFIED DOING
14 THINGS IN THE PAST THAT MAYBE THEY DIDN'T WANT TO DO OR
15 WHATEVER ON THE GROUNDS OF SOME NEW INTERPRETATION THAT THEY
16 HAVE ACCEPTED.

17 Q WITH RESPECT TO THE NEW AGE RELIGIONS THAT YOU
18 HAVE STUDIED, DID YOU ENCOUNTER THIS PHENOMENA OF
19 RECONSTRUCTION BIOGRAPHY?

20 A YES. VERY REGULARLY, AS A MATTER OF FACT. I
21 ENCOUNTERED IT TO THE EXTENT THAT WE HAVE EVEN -- I AND MY
22 GRADUATE STUDENTS HAVE EVEN WRITTEN ABOUT IT IN A PAPER TO
23 THE STRONG TENDENCY FOR PEOPLE TO JOIN IN THESE GROUPS TO
24 REINTERPRET THEIR BACKGROUND AS WORSE THAN IT WAS AND
25 THEREFORE THEY JUSTIFY MAKING GREATER CLAIMS IN THE PRESENT
26 KIND OF SITUATION LIKE I WAS SUCH A SINNER, I WAS SUCH A
27 DRUNKARD AND NOW I AM SAVED KIND -- WE FOUND THAT A LOT.

28 WE ALSO HAVE FOUND IT IN THE CONTEXT OF PEOPLE

1 LEAVING GROUPS AND WORKING OUT NEW VIEWS AND NEW
2 INTERPRETATIONS OF WHAT THEY ENCOUNTERED, WHAT THEY
3 EXPERIENCED IN THE PAST IN TERMS OF MOVING INTO SOME KIND OF
4 NEW EXPERIENCE.

5 MAYBE A NEW GROUP, MAYBE GOING BACK TO, QUOTE,
6 NORMAL LIFE OR MAYBE GETTING A JOB. BUT SOMEHOW THEY HAVE
7 GOT TO COME TO SOME KIND OF EXPLANATION TO THEMSELVES AND TO
8 OTHERS ABOUT WHY THEY DID THAT, WHY DID THEY JOIN THAT
9 GROUP, WHY DID THEY PARTICIPATE IN IT?

10 SO IN THAT SENSE, IT IS AN EXCUSE OR
11 JUSTIFICATION FOR PAST BEHAVIORS.

12 Q BASED ON WHAT YOU HAVE READ, THE MATERIALS YOU
13 HAVE READ IN THIS CASE, WAS THE BEHAVIOR OF MR. MULL
14 CONSISTENT WITH SOMEONE WHO IS RECONSTRUCTING HIS BIOGRAPHY?

15 A YES. AGAIN, I THOUGHT THE LETTERS THAT I READ
16 WERE VERY TELLING IN THIS REGARD BECAUSE THEY DO INITIALLY
17 TELL ONE STORY OF SOMEONE WHO HAS A VERY DEFINITE VIEW, A
18 POSITIVE VIEW OF WHAT THEY HAVE ENCOUNTERED. IT IS VERY
19 GOOD FOR THEM, IT'S GIVEN THEM A MEANING AND PURPOSE IN
20 LIFE. IT'S DONE A LOT OF POSITIVE THINGS FOR MR. MULL.

21 I EVEN READ, I THINK, TWO OR THREE LETTERS THAT
22 HE HAD TAKEN THE TIME TO WRITE TO NEWSPAPERS, DEFENDING THE
23 GROUP WHEN THEY WERE UNDER ATTACK, THAT SORT OF THING.

24 THEN LATER, AND WE HAVE LOOKED AT SOME OF
25 THOSE, THE SITUATION CHANGES AND TOTALLY CHANGES. I DIDN'T
26 BRING ONE OF THE LETTERS UP HERE WITH ME THAT REALLY
27 ILLUSTRATES THAT IN EARLY 1981. I DON'T REMEMBER THE EXACT
28 DATE.

1 BUT IT TALKS IN A VERY NEGATIVE SENSE ABOUT THE
2 EXPERIENCES. THEY ARE THE SAME EXPERIENCES, BUT THEY ARE
3 JUST A DIFFERENT VIEW OF THEM, A DIFFERENT INTERPRETATION
4 OFFERED THAT FITS THE PRESENT SITUATION BETTER.

5 Q IN YOUR EXPERIENCE WITH EITHER INDIVIDUALS WHO
6 HAVE RECONSTRUCTED THEIR BIOGRAPHIES, IS THE RECONSTRUCTION
7 GENERALLY ACCURATE AS TO THE FACTS?

8 A NO. THE RECONSTRUCTION CAN BEST BE UNDERSTOOD
9 IN TERMS OF THE CURRENT INTEREST OF THE PERSON, WHAT GROUP
10 ARE THEY TRYING -- MAYBE THEY ARE TRYING TO COME BACK TO
11 THEIR FAMILY, THEY ARE TRYING TO NEGOTIATE SOME KIND OF
12 ACCOUNT WITH THEIR FAMILY THAT THEIR FAMILY WILL ACCEPT,
13 MAYBE THEY ARE TRYING TO COME BACK INTO A GROUP OF FRIENDS
14 OR SOMETHING.

15 SO YOU NEED TO LOOK AT THE ACCOUNT IN TERMS OF
16 THE INTEREST AND THE VALUES AND THE PERSPECTIVES OF THAT NEW
17 REFERENCE GROUP BECAUSE THAT IS HOW YOU INTERPRET THE NEW
18 DATA IN TERMS OF THE NEW REFERENCE GROUP.

19 Q YOUR OBSERVATIONS OF NEW AGE RELIGIOUS GROUPS,
20 WHAT, IF ANY, SOCIOLOGICALLY SIGNIFICANT FUNCTIONS DO THEY
21 PLAY IN SOCIETY?

22 A WELL, AS YOU KNOW, THERE IS A LOT OF DEBATE
23 ABOUT THAT. AND I HAVE ATTENDED TO THAT QUESTION --

24 MR. LEVY: EXCUSE ME, SIR.

25 I AM GOING TO OBJECT, YOUR HONOR. RELEVANCE.

26 THE COURT: HE CAN ANSWER.

27 THE WITNESS: THANK YOU.

28 THE -- WHAT I AND OTHERS HAVE FOUND IN TERMS OF

1 STUDY OF NEW AGE RELIGIOUS GROUPS IS THAT THEY DO SERVE SOME
2 VERY INTERESTING AND I THINK IMPORTANT FUNCTIONS THAT ARE
3 SOMETIMES OVERLOOKED.

4 I USUALLY -- I WOULD LIKE TO KIND OF BREAK DOWN
5 MY RESPONSE INTO TALKING ABOUT SOCIAL LEVEL OR SOCIETAL
6 LEVEL CONSIDERATIONS AND THEN PERHAPS TALK ABOUT THE
7 INDIVIDUAL LEVEL A BIT.

8 AT THE LEVEL OF THE SOCIETY AS A WHOLE, THE NEW
9 AGE RELIGIOUS GROUPS HAVE SEEMED TO SERVE A VERY REMARKABLE
10 AND IMPORTANT FUNCTION THAT SOME PEOPLE REFER TO AS A
11 HALFWAY HOUSE FUNCTION.

12 IT IS ALSO TALKED ABOUT IN SOCIOLOGICAL
13 LITERATURE AS A REINTEGRATION FUNCTION WHERE INDIVIDUALS WHO
14 WERE OUT FLOATING IN SOCIETY WITHOUT REGULAR SOCIAL MOORINGS
15 WOULD BE BROUGHT BACK INTO SOCIETY VIA GETTING INVOLVED IN
16 SOME OF THESE GROUPS.

17 THIS WAS PARTICULARLY THE CASE IN THE LATE
18 SIXTIES AND EARLY SEVENTIES WHERE A LOT OF GROUPS WOULD FIND
19 MEMBERS WHO LITERALLY HAD VERY FEW, IF ANY, SOCIAL MOORINGS,
20 BRING THEM INTO THE GROUP AND TEACH THEM USEFUL SKILLS, GIVE
21 THEM SOME KIND OF MEANING AND PURPOSE.

22 IT MIGHT NOT BE ONE YOU AND I AGREE WITH IN
23 TERMS OF PHILOSOPHY, BUT THEY WOULD DO THAT AND THEY WOULD
24 SERVE A HALFWAY HOUSE OR REINTEGRATED FUNCTION.

25 WHAT HAPPENED TO A LOT OF THOSE PEOPLE AS THEY
26 CAME INTO THE GROUP AND LEARNED SOME SKILLS OR GOT SETTLED
27 DOWN, SOME OF THEM FORMED FAMILIES OR WHATNOT AND THEN THEY
28 WENT BACK INTO SOCIETY IN MORE NORMAL WAYS THAT WE ARE USED

1 TO.

2 THERE IS ALSO A SOCIETAL LEVEL FUNCTION THAT I
3 THINK IS OFTEN OVERLOOKED AND THAT IS THE ROLE THESE KINDS
4 OF GROUPS PLAY IN KIND OF EXPERIMENTING WITH DIFFERENT
5 CONDITIONS. THEY ARE ONE OF THE WAYS THAT OUR SOCIETY
6 CHANGES.

7 ONE OF THE MECHANISM OF SOCIAL CHANGE IN OUR
8 SOCIETY IS TO ALLOW RELIGIOUS GROUPS TO TRY OUT DIFFERENT
9 THINGS AND WHATNOT AND SEE IF SOME NEW WAY OF APPROACHING A
10 PROBLEM WILL WORK.

11 AND SO THERE HAS BEEN SOME VALUE, I THINK, IN
12 TERMS OF JUST TRYING OUT SOME THINGS LIKE COMMUNAL LIVING, I
13 THINK, WHICH HAPPENS TO BE A LOT MORE EFFICIENT AND
14 INEXPENSIVE WAY TO LIVE THAN A LOT OF FOLKS LIVE. SO WE SEE
15 SOME EXPERIMENTATION GOING ON.

16 ON THE INDIVIDUAL LEVEL, THE DATA HERE WERE
17 VERY DRAMATIC AND I MUST ADMIT BROUGHT ME UP SHORT A BIT
18 WHEN I FIRST STARTED GATHERING THE DATA BACK IN THE EARLY
19 SEVENTIES.

20 MOST OF THE PEOPLE, FOR INSTANCE, THAT
21 PARTICIPATED IN THE JESUS MOVEMENT OR IN OTHER NEW AGE
22 RELIGIOUS GROUPS HAVE PARTICIPATED PRETTY HEAVILY IN DRUGS.
23 SOMETIMES YOU SEE STATISTICS FROM RESEARCH 85, 90, 95
24 PERCENT OF THE MEMBERS HAD BEEN IN THE DRUG SUBCULTURE AND
25 BEEN REGULARLY USERS OF DRUGS.

26 THAT WAS A CASE, FOR INSTANCE, IN THE GROUP
27 THAT WE WROTE ORGANIZED MIRACLES ABOUT. WHEN YOU TALK ABOUT
28 THEIR BEHAVIOR, AFTER THEY COME INTO THE GROUP, THE DRUG USE

1 HAD DROPPED TO FIRST ZERO IN PERCENTAGE, IT STOPPED USING
2 ALCOHOL, THEY STOPPED SMOKING, SOME 75 PERCENT OF THEM HAD
3 SMOKED BEFORE THEN, THEY -- ONE OF THE PROBLEMS THAT HAD
4 BEEN DEALT WITH ALSO IS THE SEXUAL PROMISCUITY THAT A LOT OF
5 THESE PEOPLE ENGAGED IN AND HOMOSEXUAL BEHAVIOR.

6 THESE GROUPS SEEMED TO HAVE A REMARKABLE
7 ABILITY TO CURE, IN QUOTES, THAT KIND OF BEHAVIOR AND STOP
8 THE INVOLVEMENT IN THE KIND OF SEXUAL PROMISCUITY CULTURE OR
9 SUBCULTURE THAT WAS IN THE 1968, '70 ERA OF TIME.

10 ON THE INDIVIDUAL LEVEL, YOU CAN SEE A LOT OF
11 EFFECTS THAT MANY OBSERVERS HAVE HAD TO ADMIT ARE POSITIVE
12 EFFECTS IN TERMS OF HELPING PEOPLE STRAIGHTEN OUT THEIR
13 LIVES, GIVE THEM MEANING AND THAT KIND OF THING.

14 I AM NOT SAYING IT IS THE BEST THING FOR
15 EVERYONE NECESSARILY. I AM SAYING THAT IN GENERAL, I CAN
16 SAY THAT ABOUT THE MAJORITY OF THE PEOPLE THAT I HAVE
17 ENCOUNTERED IN TERMS OF THE RESEARCH THAT I HAVE DONE AND I
18 THINK THE OVERWHELMING WEIGHT OF THE LITERATURE DEMONSTRATES
19 THAT AS WELL.

20 Q BY MR. KLEIN: CAN YOU CITE FOR US OTHER
21 RESEARCHERS WHO SUPPORT THE GENERAL OPINIONS AND CONCLUSIONS
22 YOU HAVE GIVEN US TODAY?

23 A YES, I CAN. BOTH IN EUROPE AND IN NORTH
24 AMERICA. WOULD YOU LIKE ME TO LIST A FEW?

25 Q JUST LIST SOME OF THEM FOR US, SOME OF THE MORE
26 PROMINENT.

27 A OKAY. EILEEN BARKER, A PROFESSOR AT LONDON
28 SCHOOL OF ECONOMICS, HAS WRITTEN A TWO-VOLUME STUDY ON ONE

1 OF THE NEW AGE RELIGIOUS GROUPS. SHE SHARES THAT
2 PERSPECTIVE.

3 JIM BECKFORD, WHO IS A PROFESSOR AT DURHAM
4 UNIVERSITY IN ENGLAND, SHARES THIS KIND OF PERSPECTIVE.

5 JAN VAN DER LANS, WHO IS AT CATHOLIC UNIVERSITY
6 WHERE I DID MY FULBRIGHT, HAS DONE A LOT OF RESEARCH IN THIS
7 AREA AND CERTAINLY DEVELOPED INDEPENDENT OF ME THIS KIND OF
8 PERSPECTIVE.

9 WHEN YOU COME TO THIS COUNTRY, DR. MARC
10 GALANTER, A PSYCHIATRIST WHO'S AT ALBERT EINSTEIN SCHOOL OF
11 MEDICINE IN NEW YORK, WOULD BE SOMEONE THAT I WOULD CITE IN
12 THE PSYCHIATRIC FIELD.

13 WHEN YOU START TALKING ABOUT PSYCHOLOGY OF
14 RELIGION, THERE IS NEWTON MALONY AT FULLER THEOLOGICAL.

15 AND OTHERS IN THE SOCIOLOGY AREA, DAVE BROMLEY,
16 WHO IS CHAIRMAN OF THE SOCIOLOGY DEPARTMENT AT VIRGINIA
17 COMMONWEALTH IN RICHMOND, VIRGINIA; ANSON SHUPE; ROB BALCH,
18 WHO IS A PROFESSOR AT UNIVERSITY OF MONTANA IN MISSOULA.

19 STUART WRIGHT, RECENT STUDENT OUT OF UNIVERSITY
20 OF CONNECTICUT, HAS DONE A DISSERTATION ON PEOPLE WHO LEAVE
21 NEW RELIGIONS AND HAS EMPHASIZED VOLUNTEERISTIC NOTIONS
22 THERE.

23 BURKE ROCHFORD, PROFESSOR THERE AT TULSA
24 UNIVERSITY, RECENTLY COMPLETED A BOOK ON THE HARE KRISHNA
25 HAS COME TO THIS CONCLUSION BASED ON HIS RESEARCH. AND I
26 COULD LIST MORE IF YOU DESIRE.

27 MR. KLEIN: THANK YOU. THAT IS ENOUGH. THANK YOU.

28 I HAVE NO FURTHER QUESTIONS.

1 THE COURT: LET'S TAKE OUR RECESS AT THIS TIME AND
2 THEN WE WILL RESUME.

3 (RECESS.)

4 THE COURT: PROCEED.

5 MR. LEVY: THANK YOU, YOUR HONOR.

6
7 CROSS-EXAMINATION +

8 BY MR. LEVY:

9 Q DR. RICHARDSON, I HAVE LISTENED TO YOUR
10 RECITATION OF YOUR SCHOLARLY ACTIVITIES AND THEY APPEAR TO
11 ME TO BE A RATHER FULL SCHEDULE.

12 ALONG WITH YOUR FULL SCHEDULE OF TEACHING AND
13 WRITING, DO YOU ALSO DO ANY SOCIOPSYCHOLOGICAL PRIVATE
14 COUNSELING WITH PEOPLE?

15 A NO. I AM NOT A LICENSED COUNSELOR. I HAVE
16 OVER THE YEARS A NUMBER OF TIMES BEEN ASKED ON AN INDIVIDUAL
17 BASIS BY PARENTS OF PEOPLE WHO JOINED NEW RELIGIONS OR BY
18 PEOPLE WHO WERE IN THE NEW RELIGIONS FOR SOME ADVICE THAT I
19 MIGHT GIVE ON A PERSONAL LEVEL, BUT I AM NOT A COUNSELOR AND
20 NOT A LICENSED COUNSELOR.

21 Q DID YOU GIVE THAT ADVICE ON A PRIVATE BASIS?

22 A DID I GIVE ADVICE ON A PRIVATE BASIS?

23 Q YOU SAID YOU ARE NOT LICENSED, AND YOU HAD BEEN
24 ASKED BY SOME PARENTS AND PEOPLE FOR YOUR ADVICE AND COUNSEL
25 AND I AM CURIOUS IF YOU DID GIVE THAT ADVICE AND COUNSEL?

26 A WELL, WHAT I WOULD -- LIKE I REMEMBER ONE
27 EPISODE WHERE A MAN CALLED ME AND SAID, "MY SON HAS JOINED
28 THE CHILDREN OF GOD. WHAT SHOULD I DO?"

1 AND THE ADVICE AND COUNSEL I GAVE HIM WAS BE
2 PATIENT AND IT TURNS OUT THAT WAS GOOD ADVICE BECAUSE HE IS
3 NOW REUNITED WITH HIS SON. BUT THAT IS THE EXTENT OF THE
4 KIND OF ADVICE THAT I WOULD GIVE.

5 Q BUT YOU HAVE NEVER ACTUALLY COUNSELED ANYONE
6 WHO IS EITHER IN ONE OF THE NEW AGE RELIGIONS OR OUT OF ONE
7 OF THE NEW AGE RELIGIONS?

8 A WELL, I DO RESEARCH ON PEOPLE WHO JOIN THEM AND
9 PEOPLE WHO LEAVE THEM AND I DON'T CALL THAT COUNSELING.

10 Q I APPRECIATE THAT YOU DO RESEARCH AND YOU DO
11 COLLECT INFORMATION ON THEM.

12 MY SPECIFIC QUESTION WAS WHETHER OR NOT YOU
13 ACTUALLY DID ANY COUNSELING AND YOU HAVE ANSWERED ME NO; IS
14 THAT CORRECT?

15 A THAT'S CORRECT.

16 Q DID YOU EVER MEET, IN YOUR PREPARATION FOR THIS
17 TRIAL, WITH ANY OF THE CURRENT MEMBERS OF CHURCH UNIVERSAL
18 AND TRIUMPHANT?

19 A NOT UNTIL THE LAST DAY OR SO.

20 Q DID YOU EVER MEET WITH ANY EX-MEMBERS OF CHURCH
21 UNIVERSAL AND TRIUMPHANT?

22 A NO.

23 Q DID YOU EVER ATTEND OR INVESTIGATE SUMMIT
24 UNIVERSITY?

25 A WELL, IN THE LAST SEVERAL WEEKS I HAVE
26 INVESTIGATED SUMMIT UNIVERSITY TO THE EXTENT OF READING
27 THINGS LIKE THE RULES OF ORIENTATION, THE CODE OF CONDUCT, I
28 HAVE READ TRANSCRIPTS ABOUT WHAT HAPPENS THERE AND THINGS OF

1 THAT NATURE. I HAVE NOT VISITED THERE IF THAT IS WHAT YOU
2 ARE ASKING ME. I HAVE NOT VISITED THERE.

3 Q NOW, THIS IS INTENDED IN A VERY PROFESSIONAL
4 SPIRIT AND NOT TO OFFEND YOU, SIR.

5 A CERTAINLY.

6 Q BUT YOU CHARGE FEES FOR YOUR TIME WHEN YOU COME
7 TO COURT?

8 A WELL, YES. THIS IS THE SECOND TIME THAT I HAVE
9 TESTIFIED IN A CASE OF THIS NATURE IN MY ENTIRE LIFE AND I
10 AM TRYING TO FIGURE OUT WHAT I THINK IS A REASONABLE FEE
11 SCHEDULE. I WAS BOTH IMPRESSED AND ENCOURAGED WHEN I READ
12 THE FEES THAT SOME OF THE OTHER WITNESSES ARE GETTING.

13 BUT YES, I CHARGE FEES FOR BEING HERE. I AM A
14 BUSY PERSON. I HAVE TAKEN SEVERAL WEEKS OF EVERY SPARE
15 MINUTE I HAVE TO READ MATERIAL, SO I GET SOME REIMBURSEMENT
16 FOR THAT.

17 Q AND THAT IS NOT ABNORMAL. MOST PROFESSIONALS
18 WHEN THEY CHARGE FOR THEIR TIME, CERTAINLY NOT FOR THEIR
19 TESTIMONY. WOULD THAT BE ACCURATE?

20 A RIGHT.

21 Q YOU TOLD US ABOUT A NUMBER OF TRIPS THAT WERE
22 FOR STUDY PURPOSES. LIKE SAY YOU WENT TO EUROPE TO STUDY
23 SOME GROUP UP IN THE ALPS AT A NIGHT SKIING RESORT.

24 DID THAT GROUP ALSO PAY FOR YOUR TRIP TO GO
25 MAKE THAT STUDY?

26 A THE TRIPS TO EUROPE THAT I HAVE TAKEN -- THE
27 FIRST TRIP I MENTIONED IN '74, '75 WAS A SABBATICAL THAT I
28 HAD BEEN AWARDED FROM MY UNIVERSITY AND I WAS INVITED TO GO

1 TO LONDON SCHOOL OF ECONOMICS, SO IT WAS PAID FOR BY MY
2 UNIVERSITY.

3 THE FULBRIGHT I HAD IN 1981 WAS PAID BY THE
4 FULBRIGHT PROGRAM WITH SOME SUPPLEMENT FROM CATHOLIC
5 UNIVERSITY IN NIJMEGEN.

6 WHEN I HAVE TRAVELED TO PROFESSIONAL
7 CONFERENCES IN EUROPE TO GIVE PAPERS, THEN I HAVE ON ONE OR
8 TWO OCCASIONS I HAVE GOTTEN A N.S.F. GRANT OR AMERICAN
9 COUNSEL LEARNING SOCIETY GRANT.

10 BUT I HAVE ALSO PAID MY OWN WAY TO THOSE THINGS
11 IN THE SENSE THAT THAT IS WHAT A PROFESSIONAL HAS TO DO
12 SOMETIMES. IT IS AT LEAST TAX DEDUCTIBLE.

13 BUT I HAVE NOT MADE ANY TRIPS TO EUROPE AT THE
14 EXPENSE OF ANY GROUP, IF THAT IS WHAT YOU ARE SAYING, IN THE
15 NEW AGE RELIGIONS.

16 Q ALL I AM DOING IS INQUIRING, DOCTOR. I DON'T
17 KNOW, YOU HAVE TO ASK THE QUESTIONS.

18 A SURE.

19 Q SO WOULD IT BE FAIR TO SAY THAT YOUR OPINIONS
20 ARE OPEN, HONEST, AND UNBIASED AND HAVE NOT BEEN BOUGHT AND
21 PAID FOR?

22 A I CERTAINLY THINK SO.

23 Q THAT IS MY IMPRESSION. BUT I STILL NEEDED TO
24 ASK THE QUESTION.

25 A SURE.

26 Q YOU DO UNDERSTAND THAT, DON'T YOU?

27 A I CERTAINLY DO.

28 Q YOU TOLD US ABOUT A NUMBER OF LETTERS, FOUR OF

1 THEM VERY SPECIFIC LETTERS THAT YOU CONSIDERED NEGOTIATING
2 LETTERS?

3 A YES. GOOD EXAMPLES OF NEGOTIATING INSTRUMENTS.

4 Q I NOTICED YOU DIDN'T INCLUDE ANY LETTERS FROM
5 THE CHURCH ALONG WITH THOSE LETTERS.

6 IN THE COURSE OF YOUR RESEARCH, DID YOU COME
7 ACROSS ANY LETTERS TO MR. MULL FROM THE CHURCH?

8 A WELL, I'VE LISTENED TO THE TAPE OF THE MEETING
9 THAT WAS HELD, I THINK, ON JUNE 6, 1980 --

10 Q EXCUSE ME, SIR, I COULDN'T HEAR. DID YOU SAY
11 THE BEATING OR THE MEETING?

12 A THE MEETING.

13 Q THE MEETING. OKAY.

14 A AND THE CHURCH WAS CERTAINLY REPRESENTED IN ITS
15 POSITION THERE AND SO I THINK I AM AWARE OF THE CHURCH'S
16 POSITION. AND I THINK THEY WERE NEGOTIATING, TOO. THAT IS
17 PART OF THE PROBLEM OR PART OF THE SITUATION. ANY TIME YOU
18 HAVE GOT A NEGOTIATION TAKING PLACE, IT USUALLY INVOLVES TWO
19 PARTIES.

20 Q IN THE COURSE OF LISTENING TO THAT, YOU WERE
21 AWARE, OF COURSE, THAT MR. MULL AT THAT TIME HAD BEEN ASKED
22 TO LEAVE THE CHURCH; IS THAT CORRECT?

23 A YES.

24 Q NOW, ON ONE OF THE LETTERS YOU TALKED ABOUT,
25 YOU TALKED ABOUT, IF I REMEMBER, FEBRUARY 22ND, 1979, LETTER
26 FROM MR. MULL TO MOTHER AND THE BOARD OF DIRECTORS?

27 A YES.

28 Q YOU WERE READING ON THE SECOND PAGE WHERE MR.

1 MULL -- DO YOU HAVE THAT LETTER, SIR?

2 A YES, I HAVE IT RIGHT HERE.

3 MR. LEVY: I THINK THE COURT HAS A COPY AND THAT IS
4 EXHIBIT NUMBER 28, SIR.

5 THE COURT: THANK YOU.

6 Q BY MR. LEVY: ON THE SECOND PAGE, YOU WERE
7 READING WHERE MR. MULL OFFERED ". . .10 PERCENT OF ALL THE
8 PROFIT I MAKE FROM THE SALE OF MY PROPERTY." AND YOU QUOTED
9 TO US CERTAIN PORTIONS OF THAT LETTER. AND I NOTE, OH,
10 ABOUT TWO THIRDS OF THE WAY DOWN, THE SENTENCE THAT BEGINS
11 WITH, "THE \$700 PER MONTH SALARY," HAVE YOU GOT THAT IN YOUR
12 LETTER, SIR?

13 A YES.

14 Q IT SAYS: (READING.)

15 "THE \$700 PER MONTH SALARY PLUS
16 LIVING EXPENSES LIVING ON OR OFF CAMPUS MUST
17 BE AGREED UPON BY YOU BEFORE THE FOREGOING
18 OFFER CAN BE A COMMITMENT."

19 I NOTICE IN YOUR DISCUSSION, YOU LEFT THAT OUT
20 OF YOUR LETTER. DOES THAT SUGGEST THAT MR. MULL WAS NOT
21 NECESSARILY LOCKING HIMSELF INTO A POSITION OF DONATING
22 \$10,000 OR 10 PERCENT OR ANYTHING ELSE UNTIL THE CHURCH ALSO
23 COMMITTED ITSELF TO SOMETHING?

24 A WELL, I THINK ALL THE LETTERS INDICATE THAT MR.
25 MULL IS TRYING TO MAKE A CERTAIN -- TAKE A CERTAIN POSITION,
26 AND THEN KIND OF BACK OFF OF IT, AND OFFER SOME ALTERNATIVES
27 AND MAINTAIN CONTACT WITH THE GROUP. THAT IS PART OF
28 NEGOTIATION IT SEEMS TO ME.

1 THERE ARE SEVERAL OF THESE LETTERS WHERE THINGS
2 ARE SAID, THAT KIND OF ULTIMATUM STATEMENTS LIKE, "IF I
3 DON'T HEAR FROM YOU, I WILL ASSUME YOUR APPROVAL OF THIS
4 KIND OF THING," THAT KIND OF THING IS DONE.

5 SO THE REASON I DIDN'T READ THE SENTENCE IS --
6 THE WHOLE PARAGRAPH I HAVE MARKED, BUT I DIDN'T SKIP THAT
7 SENTENCE DELIBERATELY. IT IS ALL AN OFFER. IT IS A VARIOUS
8 MULTIFACETED OFFER OF WHAT KINDS OF THINGS MR. MULL MIGHT
9 DO. THAT IS THE POINT. IT IS A VERY RATIONAL PARAGRAPH.

10 Q THAT IS WHAT I AM TRYING TO UNDERSTAND BECAUSE
11 I AM NOT A SOCIAL PSYCHOLOGIST.

12 NOW YOU NOTED IN THAT TWO AND A HALF HOUR
13 MEETING AND YOU TALKED RATHER DEFINITELY ABOUT A \$10,000
14 OFFER FOR SETTLEMENT THAT MR. MULL HAD MADE AT ONE TIME.
15 THAT IS ALSO A NEGOTIATION?

16 A YES. I THINK IT IS. IN FACT I BELIEVE THE
17 RECORD DEMONSTRATES THAT IN THE JUNE 6TH MEETING, THAT HE
18 WITHDREW THE OFFER AT THAT POINT, THAT THAT IS ON THE TAPE
19 AND IN THE TRANSCRIPT.

20 SO THAT WOULD CERTAINLY INDICATE TO ME THAT
21 THAT WAS A MATTER THAT HE WAS PUTTING OUT THERE TO SEE IF
22 ANYONE WOULD TAKE IT, SEE WHAT RESPONSE IT EVOKED FROM THOSE
23 PEOPLE WHO WERE LISTENING OR READING THE LETTER. BUT THEN
24 HE APPARENTLY WITHDREW IT.

25 Q NOW, FROM YOUR POINT OF VIEW IN SOCIAL
26 PSYCHOLOGY, WHEN A PERSON MAKES AN OFFER, AND ANOTHER
27 ACCEPTS OR REJECTS IT, AND ANOTHER OFFER IS MADE AND THE
28 NEGOTIATIONS GO ON, DOES THAT SUGGEST TO YOU THAT NO

1 AGREEMENT HAS BEEN REACHED AND THAT ALL YOU HAVE IS
2 NEGOTIATIONS WITHOUT ANY HARD AND FAST AGREEMENT?

3 A WELL, WHAT IT SUGGESTS TO ME IN THE CONTEXT OF
4 THIS CASE IS THAT PEOPLE WERE TRYING -- MR. MULL WAS TRYING
5 TO MODIFY AN AGREEMENT. THE EARLIER LETTERS THAT HE HAD
6 WRITTEN TALK ABOUT LOANING MONEY TO COVER THINGS.

7 AND I THINK THE IMPRESSION I GET, OTHERWISE HE
8 WOULDN'T BE WRITING THE LETTERS, IS TRYING TO CHANGE THE
9 UNDERSTANDING, THAT MY UNDERSTANDING IS THAT THE CHURCH
10 TREATED IT THAT WAY.

11 AND SO MR. MULL IS ENGAGED IN TRYING TO
12 NEGOTIATE THAT FROM ONE CATEGORY TO ANOTHER. THAT IS THE
13 POINT I WAS TRYING TO MAKE.

14 Q DID YOU NOTICE IN THERE AT ALL MR. MULL SAYING
15 REPEATEDLY, "THIS IS NOT THE ARRANGEMENT WE HAD AT THE
16 OUTSET?" WHAT DO YOU THINK HE WAS REFERRING TO WITH REGARD
17 TO THAT?

18 A I THINK WHEN HE SAYS THAT -- I TREAT THESE
19 LETTERS AS GOOD STATEMENTS OF WHAT HIS FEELINGS WERE AT THE
20 TIME, KEEPING IN MIND WHAT WE SAID EARLIER ABOUT
21 RECONSTRUCTION OF BIOGRAPHY.

22 WHEN I READ THAT IN A LATER LETTER, I INTERPRET
23 THAT AS A SOCIOLOGIST IN TERMS OF RECONSTRUCTION OF
24 BIOGRAPHY. THERE IS SOME EVENTS THAT TOOK PLACE BACK THERE
25 THAT HE IS NO LONGER SATISFIED WITH. I HAVE THE IMPRESSION
26 THERE WERE SOME UNDERSTANDINGS THAT HE WAS BORROWING MONEY
27 FROM THE GROUP.

28 I WASN'T PRESENT. I WILL ADMIT I HAVE HAD TO

1 DEPEND ON LETTERS AND WHATNOT. BUT IT IS NOW UNPLEASANT, IT
2 IS NOT IN MR. MULL'S INTEREST TO ADMIT THAT THAT IS THE
3 CASE. SO HE IS MAKING COUNTER OFFERS. THIS IS KIND OF A
4 CLASSIC ILLUSTRATION OF OFFER, COUNTER OFFER, THAT KIND OF
5 THING.

6 Q DO YOU KNOW WHETHER OR NOT THERE WERE ANY ORAL
7 NEGOTIATIONS PRIOR TO THE SEQUENCE OF LETTERS THAT YOU
8 REFERRED TO?

9 A I WOULD ASSUME THAT THERE WERE A NUMBER OF
10 CONVERSATIONS. BUT I ALSO AM IMPRESSED WITH, AS I SAID, THE
11 VOLUME OF THESE LETTERS. SO THERE WAS SOME REASON THAT I
12 MAY NOT FULLY UNDERSTAND THAT MR. MULL SAW FIT TO WRITE ALL
13 THESE LETTERS DOWN, BUT I THINK THEY CLEARLY DEMONSTRATE
14 THAT SOMEONE WHO IS ENGAGED IN NEGOTIATING WITH THE GROUP.

15 HE WOULD -- TO TAKE THE TIME TO WRITE THESE
16 THINGS DOWN IN SUCH DETAIL AS IS DONE HERE, THE VERY PAGE WE
17 ARE LOOKING AT, ALL THAT DETAIL, SPECIFIC FIGURES AND ALL
18 THAT, IT IS THE KIND OF DISCUSSION OF COST AND THINGS THAT
19 YOU MIGHT SEE IN A LETTER FROM A REAL ESTATE AGENT OR
20 SOMETHING.

21 Q WELL NOW, I APPRECIATE THAT LONG DIALOGUE, BUT
22 YOU ARE NOT AWARE OF WHETHER OR NOT THERE WERE ANY ORAL
23 COMMUNICATIONS PRIOR TO THE EXCHANGE OF LETTERS BETWEEN MR.
24 MULL AND THE CHURCH, ARE YOU?

25 A WELL, I HAVE READ MR. MULL'S TESTIMONY IN THIS
26 COURTROOM, AND I HAVE READ THE SUMMARY OF HIS DEPOSITION AND
27 I HAVE READ THESE LETTERS.

28 ALL I CAN SAY -- I WASN'T PRESENT WHEN HE HAD

1 THESE DISCUSSIONS. IF YOU WANT ME TO ADMIT THAT, I WILL. I
2 DON'T HAVE THAT DATA ON WHICH TO DEPEND.

3 Q I DON'T WANT TO MAKE IT TOUGH FOR YOU AND I
4 DON'T WANT YOU TO HAVE TO FEEL YOU ARE UNDER SOME KIND OF
5 OBLIGATION.

6 BUT IF YOU DID NOT KNOW THAT THERE WERE ORAL
7 DISCUSSIONS AND YOU DON'T KNOW THE CONTENTS OF THEM, I DON'T
8 WANT TO PUT ANY PRESSURE ON YOU, BUT IF YOU DON'T KNOW THAT,
9 IT MIGHT BE EASIER TO JUST SAY YOU DON'T KNOW ABOUT IT.

10 A I DON'T KNOW THAT.

11 Q THANK YOU, SIR.

12 A I KNOW WHAT HE WROTE IN THE LETTERS.

13 Q IS IT POSSIBLE -- YOU CALLED IT RECONSTRUCTION
14 OF BIOGRAPHY, IS THAT WHAT YOU CALL IT?

15 A YES.

16 Q NOW, IF SOMEBODY HAS SOME KNOWLEDGE AND THEY
17 LEARN SOMETHING NEW, DOES THAT CONSTITUTE A PORTION OF THE
18 RECONSTRUCTION OF BIOGRAPHY?

19 A THEY LEARN SOMETHING NEW?

20 Q YES. SAY THEY LEARN SOMETHING, AND THEY RELY
21 ON IT, AND THEY BELIEVE IN IT AND THEY LEARN SOMETHING NEW.
22 AND WHEN THEY DISCUSS THAT SUBJECT, THEY SUPPORT THEIR NEW
23 THEORY, WOULD THAT BE PART OF THE THEORY?

24 A AS A SOCIAL PSYCHOLOGIST, I WOULD ASK TO SEE
25 WHAT IT WAS FIRST THEY LEARNED THAT WAS NEW KNOWLEDGE. IF
26 IT WAS TRULY A NEW FACT THAT COULD BE VERIFIED BY OTHER
27 METHODS, I WOULD AGREE THAT THAT COULD FIT INTO
28 RECONSTRUCTION OF BIOGRAPHY THAT MIGHT BE MORE FACTUAL.

1 HOWEVER, I WOULD PAY VERY CLOSE ATTENTION TO
2 WHAT THAT FACT WAS AND WHO WAS CLAIMING IT WAS AND WAS NOT A
3 FACT BECAUSE THAT IS EXACTLY THE POINT. VARIOUS FACTS END
4 UP BEING INTERPRETED DIFFERENT WAYS DEPENDING ON THE
5 PARTICULAR PLACE, THE SOCIAL CONTEXT, THE SELF-INTEREST OF
6 THE PERSON AT THE TIME.

7 Q I THINK I UNDERSTAND YOU. IS THAT A YES?

8 A WHAT IS THE QUESTION?

9 Q WELL, SINCE YOU ANSWERED IT AT LENGTH, I AM
10 SORRY, BUT I THOUGHT YOU UNDERSTOOD THE QUESTION.

11 MY QUESTION WAS IF SOMEBODY RELIED ON ONE STATE
12 OF FACTS, AND THEN THEY GET SOME NEW INFORMATION, AND THEN
13 THEY GO FORTH AND THEY ADVOCATE THE NEW POSITION ON THE NEW
14 INFORMATION, WOULD THAT BE LIKE A RECONSTRUCTION OF
15 BIOGRAPHY? WOULD THAT FIT INTO THE FORMAT YOU DESCRIBED TO
16 US?

17 A YES.

18 Q KIND OF LIKE WHEN I TRUSTED MY MOTHER AND
19 FATHER, AND THEY TOLD ME ABOUT THE TOOTH FAIRY, AND I WOKE
20 UP AND CAUGHT THEM PUTTING THE QUARTER UNDER MY PILLOW AND
21 FROM THAT TIME ON I NEVER BELIEVED IN THE FOOT FAIRY; THAT
22 WOULD BE A RECONSTRUCTION OF BIOGRAPHY, WOULD IT NOT?

23 A I DON'T THINK I WOULD USE THE TERM TO DESCRIBE
24 THAT PARTICULAR EPISODE. I THINK THAT IS JUST A CHILD
25 COMING TO BE A MORE MATURE PERSON.

26 Q I WAS 34 YEARS OLD THEN.

27 A YOU HAVE COLLECTED A LOT OF MONEY FROM THE
28 TOOTH FAIRY THEN.

1 Q WHAT ABOUT SANTA CLAUS? EVERYBODY LIES ABOUT
2 SANTA CLAUS. IS THERE REALLY A SANTA CLAUS, DOCTOR? OR
3 WHEN WE GO FORTH WHEN WE GET A LITTLE BIT OLDER AND WE GET
4 SOME NEW KNOWLEDGE, IS THAT ALSO A RECONSTRUCTION OF
5 BIOGRAPHY?

6 A WELL, I THINK YOU ARE OFFERING A TOO SIMPLISTIC
7 ANALOGY OF WHAT RECONSTRUCTION OF BIOGRAPHY IS. EVERYONE
8 ENGAGES IN RECONSTRUCTIONS OF THEIR BIOGRAPHY IN TERMS OF
9 THE CURRENT CONTEXT IN WHICH THEY FIND THEMSELVES. AND IT
10 IS NOT A SIMPLE OR INSIGNIFICANT KIND OF CONCEPT THAT DEALS
11 WITH TOOTH FAIRIES AND WITH SANTA CLAUS.

12 IT IS SOMETHING THAT PEOPLE DO AND IT
13 PARTICULARLY IS OF INTEREST TO THE SOCIOLOGIST AND SOCIAL
14 PSYCHOLOGIST WHERE YOU TALK ABOUT EPISODES WHERE PEOPLE HAVE
15 DRAMATICALLY CHANGED THEIR POSITION WITH RESPECT TO SOME
16 GROUP, OR WHERE THERE IS SOME CONTROVERSY PARTICULARLY WHEN
17 PEOPLE ARE LEAVING A GROUP, PULLING OUT OF A CHURCH GROUP,
18 OR PULLING OUT OF A POLITICAL ORGANIZATION OR SOMETHING OF
19 THAT NATURE. THEY HAVE GOT TO COME TO SOME KIND OF
20 EXPLANATIONS TO THEMSELVES ABOUT WHAT IT WAS THEY WERE
21 DOING, WHAT HAPPENED TO THEM.

22 AND THAT IS THE KIND OF THING THAT IS VERY
23 IMPORTANT IN THE CONTEXT OF THIS CASE AND IS
24 WELL-ILLUSTRATED BY THE RESEARCH THAT HAS BEEN DONE ON
25 PEOPLE WHO HAVE LEFT NEW RELIGIONS. I CAN ELABORATE SOME,
26 IF YOU WOULD LIKE, ON THAT.

27 Q OH, NO. YOU HAVE DONE FINE. LET ME ASK YOU
28 ANOTHER QUESTION.

1 LET'S SAY THAT HYPOTHETICAL QUESTION, LET'S SAY
2 THAT FOR WHATEVER REASON, YOU DECIDED I WAS YOUR SPIRITUAL
3 LEADER, AND I TOLD YOU I COULD FILL YOUR POCKETS AND MAKE
4 YOU LEVITATE. IF YOU FOUND OUT THAT I REALLY COULDN'T, AND
5 YOU LEFT MY GROUP AND THEN YOU TALKED ABOUT MY INABILITY TO
6 DO WHAT I SAID I COULD DO, WOULD THAT BE A RECONSTRUCTION OF
7 BIOGRAPHY?

8 A I AM NOT SURE WHICH ASPECT OF THAT QUESTION YOU
9 WANT ME TO FOCUS ON. IT IS A VERY LONG QUESTION.

10 Q BUT YOU ARE AN EXPERT. YOU CAN HANDLE IT.

11 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
12 AMBIGUOUS AND COMPOUND.

13 THE COURT: HE CAN ANSWER.

14 THE WITNESS: COULD YOU REPHRASE IT FOR ME?

15 MR. LEVY: I WONDER IF THE COURT WOULD BE KIND ENOUGH
16 TO HAVE THE REPORTER READ IT BACK.

17 THE COURT: ALL RIGHT. PLEASE.

18 (THE QUESTION WAS READ.)

19 THE WITNESS: THE RECONSTRUCTION OF BIOGRAPHY CONCEPT
20 WOULD BE APPLICABLE TO THAT KIND OF SITUATION. YOU WANT ME
21 TO ELABORATE OR DO YOU WANT TO ASK ANOTHER QUESTION?

22 Q BY MR. LEVY: I THINK I WILL TAKE A SHOT AT
23 ANOTHER QUESTION, DOCTOR.

24 NOW, SINCE YOU TOLD US THAT YOU ARE A THOUGHT
25 REFORM EXPERT, MR. KLEIN ASKED YOU WITH REGARD TO ROBERT
26 LIFTON'S -- PARDON ME, STRIKE THAT. THAT IS INCORRECT.

27 WITH REGARD TO THOSE SIX ITEMS THAT DR.
28 MARGARET THALER SINGER ENUMERATED AS PORTIONS OF A THOUGHT

1 REFORM PROGRAM, IF THOSE THINGS WERE ALL PRESENT, COULD A
2 THOUGHT REFORM PROGRAM BE EFFECTIVE? AND YOUR RESPONSE WAS
3 THAT YOU DIDN'T THINK SO, YOU DIDN'T THINK EVERYBODY IN A
4 GROUP COULD BE AFFECTED.

5 IS IT POSSIBLE THAT SOME OF THE PEOPLE IN THE
6 GROUP MIGHT BE AFFECTED?

7 MR. KLEIN: I AM GOING TO OBJECT. THAT CALLS FOR
8 SPECULATION WHEN WE TALK ABOUT SOME OF THE PEOPLE MIGHT BE
9 AFFECTED.

10 THE COURT: HE CAN ANSWER.

11 THE WITNESS: THE SITUATION WITH REFERENCE TO
12 INDIVIDUALS WOULD BE AFFECTED BY ONE'S ABILITY TO ACTUALLY
13 ESTABLISH THOSE CONDITIONS. AND THOSE CONDITIONS WOULD BE
14 VERY DIFFICULT TO ESTABLISH OUTSIDE THE CONTEXT OF SOMETHING
15 LIKE A PRISON WHERE YOU HAD PHYSICAL CONTROL OF PEOPLE.

16 IN A SITUATION WHERE ALL THE INDIVIDUALS CAN
17 GET UP AND LEAVE, CAN GO OUT AND CATCH A BUS OR CAN USE A
18 TELEPHONE, CALL OTHER PEOPLE, HAVE OUTSIDE CONTACTS, I DON'T
19 SEE THOUGHT REFORM OPERATING THERE. I SEE RESOCIALIZATION
20 OPERATING AND THAT IS A DIFFERENT TERM.

21 THOUGHT REFORM IS A TERM LIKE BRAINWASHING. IT
22 IS NEGATIVELY CONNOTED TERM. WE HAVE ALL KINDS OF
23 SITUATIONS IN OUR SOCIETY WHERE THERE IS RESOCIALIZATION
24 GOING ON. JUST HOW THOROUGH THAT IS, HOW SYSTEMATIC IT IS
25 DEPENDS ON THE CONTEXT.

26 AND I AM SIMPLY SAYING THAT I HAVE SOME SERIOUS
27 QUESTIONS ABOUT THE ABILITY OF ANY SUCH GROUP TO OPERATE IN
28 OUR SOCIETY BECAUSE WE ARE NOT TALKING ABOUT PRISON BARS,

1 AND WE ARE NOT TALKING ABOUT PHYSICAL COERCION AND KEEPING
2 PEOPLE INSIDE OF BUILDINGS AND GROUPS LIKE THAT.

3 Q BY MR. LEVY: LET ME SEE IF I UNDERSTAND YOU
4 CORRECTLY. ARE YOU SUGGESTING THAT NO NEW AGE RELIGIONS
5 SOMETIME HAVE A LESS THAN POSITIVE EFFECT ON SOME PEOPLE WHO
6 GET CAUGHT UP IN THEIR DOGMA DOCTRINE AND DICTATES?

7 A I DON'T FOLLOW THAT QUESTION. YOU HAD A COUPLE
8 OF NEGATIVES IN THERE THAT I GOT A LITTLE FOULED UP ON.

9 Q OKAY. AND SINCE I AM NOT A SOCIAL
10 PSYCHOLOGIST, I HAVE PROBLEMS SAYING IT THE RIGHT WAY.

11 LET'S SAY WE HAD A CULT, AND LET'S SAY THERE
12 WERE SOME PEOPLE, A WHOLE BUNCH OF THEM, THAT WERE EXPOSED
13 TO IT, AND LET'S SAY MOST OF THOSE PEOPLE LEFT AND WENT AWAY
14 BECAUSE THEY DIDN'T LIKE IT. AND LET'S SAY A FEW OF THEM
15 STAYED THERE.

16 IS IT POSSIBLE THAT THAT EXPERIENCE MIGHT NOT
17 BE BENEFICIAL TO THE FEW WHO STAYED THERE?

18 A I DON'T SEE WHY THEY WOULD STAY THERE IF IT
19 WASN'T BENEFICIAL. THE MODEL OF CONVERSION THAT I AND A LOT
20 OF OTHER PEOPLE HAVE ARRIVED AT THROUGH EMPIRICAL STUDY IS
21 ONE THAT HAS AN ACTIVE PERSON LOOKING FOR POSITIVE OPTIONS
22 FOR THEM. SO I DON'T SEE WHY THEY WOULD STAY THERE. THEY
23 ARE NOT TRAPPED, THEY ARE NOT IMPRISONED.

24 Q EXCUSE ME ONE SECOND.

25 DOCTOR, DID YOU EVER DO ANY SCHOLARLY RESEARCH
26 ON A GROUP CALLED THE CHILDREN OF GOD?

27 A YES, I HAVE.

28 Q IS THAT THE GROUP WHERE THE LITTLE GIRLS BECOME

1 HOOKERS FOR CHRIST?

2 A THAT IS A PRACTICE OF THE GROUP. IN FACT I
3 HAVE WRITTEN AN ARTICLE IN THE AMERICAN ACADEMY OF RELIGION,
4 THE JOURNAL OF AMERICAN ACADEMY OF RELIGION ABOUT THEIR
5 PRACTICES.

6 Q WHAT DO YOU THINK THE BENEFIT TO THOSE LITTLE
7 KIDS IS FOR BECOMING HOOKERS FOR CHRIST?

8 A WELL, I AM NOT SURE I AGREE WITH YOUR
9 PHRASEOLOGY OF "LITTLE KIDS."

10 Q BIG GIRLS THEN?

11 A OKAY, BIG GIRLS. DO YOU WANT ME TO DESCRIBE
12 FOR THE JURY WHAT --

13 Q NO. I JUST --

14 A -- WHAT THAT PROCESS IS?

15 Q NO. I JUST WANT YOU TO TELL ME WHAT BENEFIT
16 THERE IS TO THEM WHEN THEY JOIN -- WHEN IT IS SUPPOSED TO BE
17 A RELIGIOUS ORDER AND THEY BECOME PROSTITUTES?

18 A I AM NOT SURE THAT IS A BENEFIT. I DON'T THINK
19 IT IS A BENEFIT. I DID NOT SAY THAT IN THE LITERATURE THAT
20 I WROTE ABOUT THEM.

21 Q BUT YOU JUST TOLD ME A MOMENT AGO THAT IF
22 SOMEBODY JOINS A NEW AGE RELIGION, THEY STAY THERE FOR THE
23 BENEFITS. AND I AM CURIOUS TO KNOW WHAT THE PARTICULAR
24 BENEFIT WAS IN THAT INSTANCE?

25 A IN THOSE INSTANCES, THIS IS, GRANTED, A VERY
26 UNUSUAL ORGANIZATION WHERE A FEW OF THE MEMBERS WERE TALKED
27 INTO GETTING INVOLVED IN PROSTITUTION AS A WAY OF SOLICITING
28 NEW MEMBERS. I DON'T SUPPORT THAT. I DON'T THINK IT WAS A

1 GOOD IDEA.

2 IN FACT, I AM ONE OF THE PEOPLE THAT MADE THAT
3 KIND OF PROCEDURE KNOWN TO OTHER PEOPLE BY PUBLISHING AN
4 ARTICLE DESCRIBING IT. I DO NOT MAKE A CLAIM THAT EVERYONE
5 WHO JOINS A NEW RELIGION BENEFITS FROM IT IN SOME KIND OF
6 EXPLICIT WAY. I DON'T CONDONE PROSTITUTION. I DON'T THINK
7 ANYONE IN THIS ROOM WOULD.

8 Q I DIDN'T SUGGEST YOU DID, SIR. AND IF THAT IS
9 THE IMPLICATION THAT YOU PICKED UP FROM WHAT I WAS SAYING,
10 THEN I APOLOGIZE TO YOU.

11 YOU TALKED ABOUT RECONSTRUCTION OF BIOGRAPHY.
12 THE LETTER YOU LOOKED AT THERE IS FEBRUARY THE 22ND, 1979?

13 A YES.

14 Q WHILE MR. MULL IS STILL RIGHT IN THE HEART OF
15 THAT GROUP, HE HAS NOT LEFT, HE HAS NOT BEEN KICKED OUT AT
16 THAT POINT, HE IS RIGHT THERE FUNCTIONING, BELIEVING, DOING
17 WHAT THE GROUP NEEDS AND WANTS HIM TO DO, AND HE'S
18 NEGOTIATING DOLLARS, AT THAT POINT WAS HE DOING
19 RECONSTRUCTIVE BIOGRAPHY, OR WAS HE JUST SIMPLY TRYING TO
20 CLARIFY WHATEVER ARRANGEMENT HAD BEEN MADE BETWEEN HIMSELF
21 AND THE PEOPLE IN CHARGE OF CHURCH UNIVERSAL AND TRIUMPHANT
22 OR DO YOU KNOW?

23 A I THINK HE WAS INVOLVED IN RECONSTRUCTION OF
24 BIOGRAPHY. AS I SAID, THESE LETTERS REPRESENT AN UNUSUAL
25 DATA SET BECAUSE MOST OF THE NEGOTIATING THAT INDIVIDUALS
26 HAVE DONE IN NEW AGE RELIGIOUS GROUPS HAS BEEN ORAL, NOT
27 WRITTEN. SO THIS REPRESENTS A VERY UNUSUAL DATA SET IN THAT
28 REGARD.

1 Q CAN YOU DO RECONSTRUCTIVE BIOGRAPHY WHILE YOU
2 ARE STILL PART AND PARCEL OF SOMETHING?

3 A ANYONE -- WELL, THE ANSWER IS YES, YOU CAN.
4 MOST PEOPLE WHO JOIN ANY KIND OF GROUP DO SO WITH CERTAIN
5 KINDS OF RESERVATIONS. SOCIAL PSYCHOLOGISTS HAVE REFERRED
6 TO THAT OCCASIONALLY AS QUALIFIED JOINING WHERE YOU HAVE
7 SOME QUALIFICATIONS OR SOME QUESTIONS.

8 ONE SOCIAL PSYCHOLOGIST HAS REFERRED TO THIS AS
9 LATENT RESERVATIONS WHEN PEOPLE JOIN. WHEN THEY START
10 PARTICIPATING IN A GROUP, IF THINGS DON'T WORK OUT AS THEY
11 SAY, THEN THEY START LOOKING AT ALTERNATIVES AND DEVELOPING
12 ALTERNATIVES OUTSIDE THE GROUP, LOOKING AROUND.

13 THEY START NEGOTIATING TO SEE IF THEY CAN WORK
14 OUT AN ARRANGEMENT THAT IS A LITTLE MORE TO THEIR BENEFIT OR
15 THEY CAN LIVE WITH IT.

16 SO ONE OF THE PROBLEMS THAT THE EARLY
17 LITERATURE HAD OUT OF SOCIAL PSYCHOLOGY AND SOCIOLOGY IS
18 THERE WAS SOME KIND OF AN ASSUMPTION OF AN INSTANTANEOUS
19 CHANGE IN PEOPLE WHEN THEY JOINED GROUPS WHERE THEIR BELIEFS
20 WERE CHANGED LITERALLY OVERNIGHT OR IN AN INSTANT AND THEY
21 WERE DIFFERENT FROM THEN ON.

22 AND THE LITERATURE, THE EMPIRICAL RESEARCH THAT
23 HAS BEEN DONE ON NEW RELIGIONS BY SOCIOLOGIST, PSYCHOLOGIST
24 AND MOST PSYCHOLOGISTS AND PSYCHIATRISTS SIMPLY DOESN'T
25 SUPPORT THAT. IT IS PEOPLE MAKING SIDE BETS, AND CHECKING
26 OUT OTHER ALTERNATIVES AND LOOKING AT THEM. THAT IS THE
27 PROCESS.

28 SO I AM NOT AT ALL SURPRISED THAT WHILE SOMEONE

1 WAS STILL A PART OF A GROUP, THEY WOULD BE ENGAGED IN SOME
2 KIND OF RECONSTRUCTION, REINTERPRETATION OF THEIR BIOGRAPHY
3 TO FIT BETTER WITH THE FACTS. THEY ARE NOT GETTING QUITE
4 THE DEAL THEY THOUGHT THEY WERE GETTING, AND SO THEY END UP
5 COMING TO SOME NEW INTERPRETATION OF THAT.

6 Q DO YOU THINK MR. MULL, WHEN HE SAID, "I CAN'T
7 MAKE ANY COMMITMENT UNTIL YOU ACCEPT MY TERMS," HE WAS
8 SETTING FORTH EXACTLY WHAT HIS TERMS WERE?

9 A AT THE TIME, YES.

10 Q AND YOU DON'T KNOW WHETHER OR NOT THOSE WERE
11 THE TERMS OF ANY OFFER THAT BROUGHT HIM TO CAMELOT? YOU
12 HAVE NO IDEA WHETHER OR NOT -- WHAT HE IS SETTING FORTH ARE
13 THE TERMS OF WHAT BROUGHT HIM THERE IN THE FIRST PLACE, DO
14 YOU?

15 A WELL, I DIDN'T BRING THE REST OF THE LETTERS UP
16 HERE, BUT HE WROTE LETTERS THAT TALK ABOUT -- USE THE WORD
17 "LOAN" AND THINGS OF THAT NATURE.

18 SO I THINK WHEN THOSE LETTERS WERE WRITTEN
19 BEFORE THESE LETTERS, THAT THEY INDICATE -- THEY EITHER
20 INDICATE THAT HE WAS INVOLVED IN DISSIMULATION AND NOT
21 SAYING WHAT HE REALLY INTENDED OR THAT HE THOUGHT THEY WERE
22 LOANS.

23 HE MAY HAVE CHANGED HIS MIND LATER IN A
24 DIFFERENT SITUATION, BUT THE LETTERS REFLECT WHAT HE SAID.
25 I MEAN IT IS AS GOOD AS A TAPE RECORDING OF AN ORAL
26 CONVERSATION.

27 Q YOU MADE REFERENCE TO IT IS AS GOOD AS A TAPE
28 RECORDING OF AN ORAL CONVERSATION.

1 YOU REMEMBER THE TAPE RECORDING OF THE ORAL
2 CONVERSATION, THE TWO AND A HALF HOUR ORAL CONVERSATION, DO
3 YOU REMEMBER IN THERE WHERE MR. MULL REPEATEDLY SAYS, "WHAT
4 YOU ARE DOING NOW IS NOT ACCORDING TO THE TERMS UNDER WHICH
5 I CAME TO CAMELOT"?

6 A YES, I REMEMBER THAT.

7 Q DOES THAT NOT SUGGEST TO YOU THAT MAYBE ALL OF
8 THE NEGOTIATION, AS YOU REFER TO IT, IS PREDICATED ON HIS
9 BELIEF THAT HE WENT TO CAMELOT UNDER OTHER TERMS?

10 A THAT IS HIS VIEW OF WHAT -- THAT IS HIS VIEW AT
11 THE TIME, UNLESS AGAIN HE WAS DISSIMULATING DURING THE
12 MEETING.

13 Q ISN'T IT STRANGE IN THE COURSE OF ALL THESE
14 LETTERS, AND THE FOUR YOU CHOSE TO BRING US AND EVERYTHING
15 ELSE THAT ALL THE DISSIMULATION SO FAR THAT YOU HAVE FOUND
16 MUST BE FROM MR. MULL?

17 IS IT POSSIBLE, SIR, THAT SOME OF THE
18 DISSIMULATION, IF THERE BE ANY, MIGHT HAVE COME FROM A GROUP
19 OF PEOPLE WHO HAVE ADMITTEDLY NOT SET OUT SPECIFIC TERMS AND
20 WHO HAVE TESTIFIED HERE THAT ARRANGEMENTS WERE NOT
21 COMPLETED, ONLY PARTIALLY COMPLETED BEFORE MR. MULL WENT TO
22 CAMELOT?

23 DID YOU BOTHER TO READ ALL OF THOSE LETTERS?

24 A I HAVE READ A LENGTHY LIST OF THINGS. THE
25 ANSWER TO YOUR QUESTION IS THERE -- YES, THERE MAY HAVE BEEN
26 MISUNDERSTANDING ON BOTH SIDES. I HAVE -- THAT'S POSSIBLE.

27 Q DID YOU READ ANY OF THE TESTIMONY OF ANY OF THE
28 PEOPLE WHO HAVE TESTIFIED FOR THE CHURCH?

1 A NO.

2 Q DOESN'T IT SEEM LIKE IT MIGHT HAVE GIVEN YOU
3 BOTH SIDES OF THE COIN, A LITTLE BETTER PERSPECTIVE TO MAKE
4 ALL OF YOUR DECISIONS IF YOU HAD READ BOTH SIDES?

5 A WELL, I DID READ TWO DIFFERENT TIMES THE
6 TRANSCRIPT OF THE JUNE THE 6TH MEETING AND I HAVE ALSO READ
7 MR. MULL'S LETTERS, WHICH ARE OBVIOUSLY REACTING TO
8 DISCUSSIONS HE'S HAD WITH CHURCH MEMBERS AND OTHER THINGS.

9 I MUST ADMIT THERE'S ALSO BEEN A PROBLEM OF
10 TIME IN TERMS OF JUST MY ABILITY TO READ TRANSCRIPTS. BUT I
11 THINK I HAVE A FLAVOR FOR THE KINDS OF THINGS -- HE
12 SOMETIMES QUOTES CHURCH MEMBERS IN THE LETTERS AS SAYING
13 CERTAIN THINGS TO HIM AND HE WANTS CLARIFICATION ON THEM OR
14 THINGS OF THAT NATURE.

15 SO I MUST ADMIT I THINK I HAVE A FLAVOR FOR THE
16 CHURCH'S POSITION. I AM NOT AT ALL SAYING THAT THERE
17 COULDN'T BE A MISUNDERSTANDING THERE. THAT IS PART OF THE
18 NEGOTIATION.

19 Q I THINK I HAVE A FLAVOR, TOO.

20 TELL ME, DOCTOR, AS A SOCIAL PSYCHOLOGIST, IF
21 SOMEONE WHO PURPORTS TO BE THE SPIRITUAL HEAD OF AN
22 ORGANIZATION DELIVERS MATERIAL TO HER FOLLOWERS, MATERIAL
23 THAT YOU AND I WHO ARE PRAGMATISTS AND PRACTICAL PEOPLE AND
24 ACCEPT TRUISMS THAT WE SEE IN LIFE, IF SOMEONE WERE TO
25 DELIVER A MESSAGE TO HER FOLLOWERS, AND THE MESSAGE
26 PURPORTED TO BE FROM SOMEONE WHO US POOR MORTALS CONSIDER TO
27 BE DIED, PASSED ON AND GONE ON THEIR WAY, AND THIS
28 INDIVIDUAL DELIVERED IT TO HER FOLLOWERS AS SOME SPECIAL

1 COMMUNICATION TO HER, WOULD YOU CONSIDER THAT THAT KIND OF
2 COMMUNICATION MIGHT BE MANIPULATIVE?

3 A MANIPULATIVE?

4 MR. KLEIN: I AM GOING TO OBJECT AS VAGUE AND
5 AMBIGUOUS AND CALLING FOR SPECULATION FROM THE WITNESS.

6 THE COURT: HE CAN ANSWER.

7 THE WITNESS: COULD I ASK WHAT YOU MEAN BY
8 "MANIPULATIVE" BEFORE I PROCEED?

9 Q BY MR. LEVY: YOU REMEMBER I TOLD YOU ABOUT MY
10 PARENTS WHO KEPT PUTTING QUARTERS UNDER THERE LIKE THEY WERE
11 KIND OF MAYBE MANIPULATING ME? BUT LET'S SAY THIS
12 MANIPULATION IS A HELL OF A LOT BIGGER. LET'S SAY IT IS A
13 REAL MANIPULATION.

14 A WHAT IS A "REAL MANIPULATION"?

15 Q A MANIPULATION TO MAINTAIN CONTROL AND
16 DOMINANCE OVER FOLLOWERS. THAT IS WHAT I MEAN BY A BIG
17 MANIPULATION.

18 A WELL, ARE YOU ASSUMING THAT THAT IS WHAT TAKES
19 PLACE EVERY TIME SOMEONE WHO CLAIMS TO BE A SPIRITUAL LEADER
20 SPEAKS TO HIS OR HER FOLLOWERS?

21 Q NO, THAT IS NOT WHAT I SAID, DOCTOR.

22 WHAT I SAID WAS IF A SPIRITUAL LEADER PASSES ON
23 TO HER FOLLOWERS WHAT PURPORTS TO BE A MESSAGE THAT CAME
24 FROM SOMEBODY WHO IS ALREADY DECEASED DIRECTLY TO THAT
25 INDIVIDUAL AND THAT INDIVIDUAL PASSES IT ON TO THE FLOCK, IS
26 THE OBTAINING OF THAT KIND OF INFORMATION AND THAT KIND OF
27 PRESENTATION TO THE FLOCK GENERALLY DONE WITH THE INTENT TO
28 MANIPULATE OR SUPPORT THAT POSITION OF EMINENCE WITHIN THAT

1 QUASI-RELIGIOUS GROUP?

2 A I DON'T THINK SO. I SIMPLY THINK THAT MOST
3 SPIRITUAL LEADERS OF RELIGIONS ARE IN FACT MAKING A GENUINE
4 EFFORT TO LEAD THEIR FLOCKS IN THE WAY OF SPIRITUAL
5 DEVELOPMENT. I AM NOT ANTIRELIGIOUS --

6 Q I -- I BELIEVE YOU ARE NOT. I BELIEVE YOU ARE
7 VERY STRAIGHTFORWARD AND I BELIEVE YOU ARE HONEST. AND THAT
8 IS WHY I WANT TO SHOW YOU THIS.

9 I'D ASK THAT THEY MARK THIS FOR IDENTIFICATION
10 AS THE NEXT NUMBER IN ORDER, WHICH, UNFORTUNATELY, LYNN, I
11 HAVE FORGOTTEN.

12 THE COURT: 119.

13 (MARKED FOR ID: ^ EXHIBIT 119, LETTER)

14 MR. LEVY: THANK YOU, YOUR HONOR.

15 Q SIR, THIS PURPORTS TO BE A LETTER TO ELIZABETH
16 CLARE PROPHET FROM JOHN F. KENNEDY. IF YOU WILL LOOK AT THE
17 DATE OF THAT, YOU WILL NOTICE THAT THE COMMUNICATION CAME
18 SOME SEVEN DAYS AFTER MR. KENNEDY WAS ASSASSINATED. NOW
19 MY --

20 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. I THINK
21 COUNSEL -- THERE IS NOT A FOUNDATION FOR -- COUNSEL IN FACT
22 TESTIFIED AS TO WHO THAT LETTER WAS FROM. IT MENTIONS
23 ELIZABETH CLARE PROPHET AND THERE IS NOTHING IN THAT LETTER
24 THAT SAYS THAT.

25 THE COURT: LET'S SEE WHAT --

26 MR. KLEIN: HE HAS GIVEN THE WITNESS AN ASSUMPTION
27 THAT THERE IS NO FOUNDATION FOR. THAT IS MY OBJECTION.

28 THE COURT: WHY DON'T YOU START WITH A QUESTION.

1 MR. LEVY: LET ME POINT OUT TO YOU SEVERAL THINGS IN
2 THIS LETTER.

3 THE COURT: I HAVE NO OPINION ABOUT THE LETTER RIGHT
4 NOW. I HAVE NEVER SEEN IT BEFORE. IN FACT I HAVEN'T SEEN
5 IT YET. YOU HAVEN'T GIVEN ME A COPY.

6 MR. LEVY: I JUST GOT IT MYSELF, YOUR HONOR.

7 MR. KLEIN: COUNSEL NEVER SEEMS TO HAVE COPIES, SO WE
8 CAN NEVER READ THE LETTERS WHEN WE GET THEM.

9 MR. LEVY: IT WAS -- I WON'T HAVE A DIALOGUE. EXCUSE
10 ME, SIR.

11 THE WITNESS: YOUR HONOR, AM I SUPPOSED TO READ THIS?

12 THE COURT: I DON'T KNOW. BEATS ME.

13 Q BY MR. LEVY: WHY DON'T YOU READ THE INITIAL
14 PARAGRAPH, AND MAYBE THAT WILL CLARIFY WHAT THE LETTER IS
15 AND JUST EXACTLY WHERE IT CAME FROM.

16 THE WITNESS: WOULD YOU LIKE TO READ THE LETTER?

17 THE COURT: OH, LET ME LOOK AT IT FOR A SECOND. I AM
18 PROBABLY GOING TO HAVE TO.

19 MR. KLEIN: WITH THE COURT'S PERMISSION, MIGHT I ALSO
20 TAKE ONE QUICK LOOK AT THE LETTER? I SAW IT A MOMENT AGO,
21 BUT I'D LIKE TO LOOK AT IT.

22 THE COURT: SURE.

23 Q BY MR. LEVY: NOW FOR PURPOSES OF MY
24 HYPOTHETICAL, LET'S ASSUME THIS LETTER CAME, AS IT SAYS IT
25 DOES, DOWN FROM THE ASCENDED MASTERS. AND TO FURTHER INFORM
26 YOU, WE HAVE BEEN INFORMED IN THIS COURTROOM THAT THE
27 ASCENDED MASTERS IN THIS CHURCH SPEAKS ONLY THROUGH
28 ELIZABETH CLARE PROPHET.

1 THE LETTER ALSO BEARS A COPYRIGHT ON THE BOTTOM
2 AND YOU WILL NOTE THE COPYRIGHT IS IN THE NAME OF SUMMIT
3 LIGHTHOUSE, WHICH IS THE PREDECESSOR OF CHURCH UNIVERSAL AND
4 TRIUMPHANT.

5 A WHAT IS IT YOU WANT ME TO SAY ABOUT THE LETTER?

6 Q WELL, I WANT TO ASK YOU A QUESTION ABOUT THE
7 LETTER. IF THE SPIRIT -- AND THIS IS THE HYPOTHETICAL
8 QUESTION.

9 IF THE LETTER THAT PURPORTS TO COME FROM A
10 DECEASED INDIVIDUAL THROUGH ONE OF THE ASCENDED MASTERS TO
11 THIS GROUP IS DISSEMINATED TO THE GROUP UNDER THE AUSPICES
12 OF THE SPIRITUAL LEADER OF THE GROUP, DOES IT SEEM PROBABLE
13 TO YOU THAT THE SPIRITUAL LEADER OF THE GROUP MIGHT
14 MAINTAIN -- BOY, THAT IS GETTING HAIRY. LET ME SHORTEN IT
15 UP IF I CAN.

16 CAN YOU SEE ANY OTHER REASON OTHER THAN TO BE
17 ABLE TO MANIPULATE THE FOLLOWERS INTO BELIEVING THE EMINENCE
18 OF THE SPIRITUAL LEADER OF A COMMUNITY TO DISSEMINATE TO
19 THEM A LETTER DATED BY SOMEONE WHO DIED SEVEN DAYS BEFORE
20 THE DATE OF THE LETTER?

21 MR. KLEIN: YOUR HONOR, MY OBJECTION, YOUR HONOR, IS
22 THE LETTER IS DATED 1963.

23 THE COURT: JUST TELL US WHAT THE GROUNDS ARE.

24 MR. KLEIN: THE HYPOTHETICAL SAID THAT ELIZABETH
25 CLARE PROPHET IS TO BE ASSUMED TO BE THE SPIRITUAL LEADER.
26 IN 1963, SHE WASN'T THE SPIRITUAL LEADER, YOUR HONOR. WE
27 HAVE HAD TESTIMONY THAT SHE WAS NOT AT THAT TIME. MARK
28 PROPHET WAS STILL ALIVE AT THAT TIME, YOUR HONOR.

1 THAT IS MY OBJECTION. THE HYPOTHETICAL IS
2 INCORRECT WHEN IT MENTIONS THIS PARTICULAR PERSON AND I
3 WOULD SAY IT IS NOT RELEVANT TO THIS CASE.

4 THE COURT: SUSTAINED.

5 Q BY MR. LEVY: HYPOTHETICAL QUESTION, DOCTOR.
6 WE DO UNDERSTAND THAT SUMMIT LIGHTHOUSE BECAME CHURCH
7 UNIVERSAL AND TRIUMPHANT?

8 A YES.

9 Q NOW WITH THAT IN MIND, CAN YOU SEE, SINCE YOU
10 ARE AN EXPERT IN SOCIOLOGY AND SOCIOLOGICAL PSYCHOLOGY,
11 WOULD THAT TYPE OF COMMUNICATION TO FOLLOWERS GENERALLY BE
12 USED FOR ANYTHING OTHER THAN AN ATTEMPT TO MANIPULATE AND
13 CONTROL AND TO DOMINATE FOLLOWERS, ESPECIALLY SINCE IT
14 PURPORTS TO COME AND BE DATED SEVEN DAYS AFTER THE DEATH OF
15 THE INDIVIDUAL?

16 A I -- I HAVE NO WAY OF ATTESTING TO THE VERACITY
17 OF THIS DOCUMENT.

18 Q I DIDN'T ASK YOU TO.

19 A WELL, YOU ARE IMPLYING THAT THIS DOCUMENT IS
20 TOTALLY FALSE.

21 Q DOCTOR, EXCUSE ME, DOCTOR. THIS IS NOT A
22 DEBATE. I GAVE YOU A HYPOTHETICAL AND I --

23 THE COURT: LET HIM ANSWER, PLEASE.

24 THE WITNESS: YOU ARE IMPLYING THAT THIS DOCUMENT IS
25 TOTALLY FALSE. I HAVE NO WAY, PARTICULARLY AS A
26 SOCIOLOGIST, TO ATTEST TO THE VERACITY OF THIS -- I WOULD
27 CALL IT A REVELATION.

28 WHEN SOME SPIRITUAL LEADER GIVES A REVELATION

1 TO A CHURCH, THEY ARE DOING IT, I THINK, GENERALLY BECAUSE
2 THEY THINK THEY HAVE HAD A REVELATION THAT WOULD BE OF SOME
3 VALUE TO THEIR MEMBERS.

4 THE FACT THAT IT IS FROM PRESIDENT --
5 SUPPOSEDLY FROM PRESIDENT KENNEDY SHORTLY AFTER HIS DEATH, I
6 AM NOT WILLING TO SAY THAT SOMETHING OF THIS NATURE IS
7 MANIPULATIVE. IT WAS PROBABLY PRESENTED IN THE CONTEXT OF A
8 RELIGIOUS SERVICE OR EXPERIENCE.

9 AND EVEN AS A SOCIOLOGIST, I MUST SAY THAT
10 THERE IS SOME VALUE IN THOSE KINDS OF EXPERIENCES FOR
11 PEOPLE. SO NO, I DON'T CONSIDER IT MANIPULATIVE TO HAVE
12 THESE KINDS OF PRESENTATIONS.

13 I WOULD GO -- AT THE RISK OF OFFENDING SOME
14 CHURCH MEMBERS, I WOULD ALSO SAY THAT PROBABLY A LOT OF
15 PEOPLE WHO HEARD THIS, IF IT WAS PRESENTED, HAD SOME
16 QUESTION ABOUT WHERE IT CAME FROM AND ITS MEANING.

17 ONE OF THE THINGS I FOUND FROM SITTING IN LOTS
18 OF MEETINGS AND LOTS OF NEW RELIGIOUS ORGANIZATIONS IS LOTS
19 OF FOLKS HAVE RESERVATIONS ABOUT THINGS THAT SOME OF THEIR
20 LEADERS SAY SOMETIMES. SO THEY QUESTION, THEY RAISE ISSUES,
21 THEY TALK AMONG THEMSELVES.

22 SO I WOULD -- AS A SOCIAL PSYCHOLOGIST, I WOULD
23 HAVE BEEN FASCINATED TO BE THERE THE NIGHT THIS LETTER WAS
24 READ AND THEN AFTER THE SERVICE, LISTEN TO PEOPLE TALK.
25 THAT WOULD HAVE BEEN MY INTEREST.

26 BUT I WILL CLOSE AND JUST REITERATE THAT I
27 CAN'T ATTEST TO THE VERACITY THAT SOMETHING A SPIRITUAL
28 LEADER SAYS MAY BE A REVELATION FROM GOD OR FROM A DESCENDED

1 (SIC) MASTER. THAT IS NOT WITHIN THE PURVIEW OF SOCIOLOGY.

2 Q BY MR. LEVY: THEN LET ME JUST ASK YOU ONE LAST
3 PRACTICAL QUESTION.

4 HAVE YOU EVER KNOWN ANYBODY WHO DIED, AND GOT
5 RESURRECTED AND THEN WROTE YOU A LETTER SEVEN DAYS AFTER
6 THEY HAVE DIED?

7 A HAVE I EVER KNOWN ANYONE?

8 Q YOU DO A LOT OF RESEARCH. YES, YOU.

9 A YOU MEAN HAS SOMEONE I KNOW PERSONALLY DONE
10 THAT, OR DO I KNOW THAT IT HAS HAPPENED OR --

11 Q NO, NO, NO. LET ME TRY TO HELP YOU BECAUSE YOU
12 KEEP GETTING MIXED UP

13 HAVE YOU EVER KNOWN ANYONE WHO DIED, AND THEN
14 CAME BACK SEVEN DAYS LATER AND WROTE YOU A LETTER, YOU?

15 A NO.

16 MR. LEVY: NEITHER HAVE I, DOCTOR.

17 NOTHING FURTHER, YOUR HONOR.

18 THE WITNESS: DO YOU WANT THE LETTER?

19 MR. LEVY: OH, I WILL GET IT AFTER A BIT.

20 THE COURT: IT WILL BE PICKED UP.

21 THE WITNESS: OKAY. THANK YOU.

22

23 REDIRECT EXAMINATION +

24 BY MR. KLEIN:

25 Q I JUST HAVE ONE QUESTION, DOCTOR.

26 YOU TESTIFIED THAT THOSE FOUR LETTERS THAT YOU
27 ANALYZED FOR US FROM MR. MULL WERE EXAMPLES OF HIM
28 NEGOTIATING. WHAT IS THE SIGNIFICANCE OF THE FACT THAT MR.

1 MULL NEGOTIATED WITH CHURCH UNIVERSAL AND TRIUMPHANT IN
2 THOSE LETTERS AND IN OTHER LETTERS?

3 A WELL, THE SIGNIFICANCE OF IT IS THAT IT
4 INDICATES THAT HE WAS A PERSON WHO WAS TRYING TO TAKE
5 CONTROL OF HIS LIFE AND HE WAS ACTING AS AN ACTIVE AGENT. I
6 I WOULD NOT ACCEPT THE IDEA BASED ON WHAT I HAVE READ OF MR.
7 MULL THAT HE WAS A PASSIVE KIND OF OBJECT BEING PUSHED
8 AROUND.

9 THERE IS TOO MUCH RATIONAL THOUGHT IN THESE
10 LETTERS, THEY ARE TOO WELL-WRITTEN, THEY ARE BALANCED. I
11 POINTED OUT IN SOME OF THEM THEY START OUT WITH ADULATION
12 KINDS OF PHRASEOLOGY AND THEN MOVE TO WHAT IT IS THAT MR.
13 MULL WOULD LIKE TO ACCOMPLISH VIA THAT LETTER.

14 SOMETIMES THEY CLOSE WITH KIND OF AN ULTIMATUM
15 STATEMENT, "IF I DON'T HEAR FROM YOU, I WILL ASSUME THIS IS
16 ALL RIGHT." IT IS VERY ILLOGICAL FOR ME TO THINK THAT
17 LETTERS THAT CAREFULLY PUT TOGETHER COULD BE DONE BY SOMEONE
18 WHO WASN'T IN CONTROL OF THEIR -- THEMSELVES AND THEIR
19 SENSES.

20 MR. KLEIN: THANK YOU.

21 I HAVE NO FURTHER QUESTIONS.

22 MR. LEVY: JUST ONE, YOUR HONOR.

23

24 RE-CROSS-EXAMINATION +

25 BY MR. LEVY:

26 Q I AM LOOKING AT EXHIBIT NUMBER 30. DOCTOR, I'D
27 LIKE YOU TO -- BEFORE I SHOW YOU THIS, ONE QUESTION.

28 IN ALL THE READING THAT YOU HAVE DONE, IS THERE

1 ANY INDICATION THAT AT ANY TIME MR. MULL WAS MAYBE UPSET OR
2 FELT PRESSURED OR MIGHT HAVE BEEN EMOTIONALLY CONSTRAINED
3 WHEN HE WAS WRITING ANY OF THOSE LETTERS?

4 A WELL, I HAD NO INDICATION ON THE FACE OF THE
5 LETTERS. A LOT OF THEM WERE HANDWRITTEN, OBVIOUSLY WRITTEN
6 AT HOME BY HIMSELF, THAT KIND OF THING. MAYBE I AM NOT
7 CLEAR ON YOUR QUESTION.

8 Q I SEEM TO HAVE A PROBLEM MAKING MY QUESTIONS
9 CLEAR.

10 IN ALL THE LETTERS THAT YOU HAVE READ, DID ANY
11 OF THE LETTERS INDICATE TO YOU THAT MR. MULL MIGHT HAVE BEEN
12 UPSET OR UNDER SOME KIND OF EMOTIONAL CONSTRAINT WHEN HE
13 WROTE ANY OF HIS LETTERS?

14 A WELL, THAT -- THAT IS A COMPOUND QUESTION.

15 Q IT PROBABLY IS.

16 A HE CERTAINLY WAS UPSET, FOR INSTANCE, THE
17 LETTER TO RANDALL KING. HE WAS VERY UPSET THAT A MESSAGE
18 HAD BEEN LEFT ON HIS DICTAPHONE FROM MR. KING THAT WAS
19 APPARENTLY ABUSIVE OR SOMETHING AND HE WROTE, WHAT IS IT,
20 SIX-PAGE LETTER IN LONGHAND THAT IN ITSELF EXPRESSES A GREAT
21 DEAL OF UPSETNESS OR ANGER.

22 WHETHER HE WAS UNDER SOME KIND OF COERCION TO
23 WRITE THE LETTER, I -- THAT DOESN'T TO ME MAKE SENSE THAT
24 SOMEONE TALKED HIM INTO WRITING THIS LETTER.

25 Q I DON'T THINK I SUGGESTED THAT, SIR. YOU'VE
26 CHARACTERIZED THE LETTERS AS WRITTEN BY SOMEONE TOTALLY IN
27 CONTROL. NOW YOU TELL US THAT WHEN YOU LOOK AT SOME OF
28 THOSE LETTERS, YOU SEE THEY WERE WRITTEN BY SOMEONE WHO WAS

1 EMOTIONALLY DISTRAUGHT ON SOME OCCASIONS.

2 I HAVE A PROBLEM BECAUSE I CAN'T DECIDE WHETHER
3 MR. MULL WAS IN TOTAL CONTROL AND MAYBE MANIPULATING, OR HE
4 WAS EMOTIONALLY UPSET AND TRYING TO CLARIFY A SITUATION.

5 DO YOU HAVE ANY IDEA FROM HAVING READ THE
6 LETTERS?

7 A YES. THE FACT THAT HE IS EMOTIONALLY UPSET IN
8 THE LETTER TO RANDALL KING DOESN'T UNDERCUT THE ARGUMENT
9 THAT HE WAS IN CONTROL OF HIMSELF. IN FACT I THINK WHEN HE
10 IS UPSET AT SOMETHING OF THIS NATURE, IT IS VERY REVEALING
11 TO SEE THE KINDS OF THINGS HE DOES WRITE.

12 Q I WONDER IF YOU'D BE KIND ENOUGH TO -- THIS IS
13 ONE LETTER FROM MR. MULL THAT YOU HAVEN'T MENTIONED YET.
14 THAT IS EXHIBIT NUMBER 30.

15 MR. KLEIN: WHAT IS THE DATE OF THAT LETTER, PLEASE?

16 THE WITNESS: JUNE 5TH, 1979.

17 MAY I READ THE LETTER?

18 THE COURT: SURE.

19 THE WITNESS: SORRY IT TOOK SO LONG. I HAVE SKIMMED
20 THE LETTER. I HAVE READ IT BEFORE.

21 Q BY MR. LEVY: DOES THE FIRST PARAGRAPH GIVE YOU
22 ANY INDICATION THAT MR. MULL MIGHT BE IN SOME KIND OF
23 EMOTIONAL TURMOIL OR NOT TOTALLY IN CONTROL?

24 WE HAVE READ THE LETTER IN ITS ENTIRETY TO THE
25 COURT. I WONDER IF YOU'D DO US A FAVOR AND READ JUST THE
26 FIRST PARAGRAPH.

27 A ALL RIGHT. (READING.)

28 "DEAR MOTHER AND MONROE,

1 "AS A MATTER OF INFORMATION AND
2 NOT COMPLAINT." THAT IS A PRETTY RATIONAL
3 STATEMENT.

4 "MY LIFE SINCE BEING HERE THE LAST FIVE
5 MONTHS IS LIKE A YO-YO -- DIFFERENT THAN
6 WHAT I EXPERIENCED IN THE WORLD. SICK, THEN
7 WELL, FULL OF ENERGY, THEN DEPLETED. I CALL
8 IT GOD OPPORTUNITY, BALANCING KARMA."

9 IS THAT --

10 Q NOW WITH THAT DESCRIPTION, IS IT STILL YOUR
11 OPINION THAT MR. MULL WAS IN TOTAL CONTROL OF HIS SITUATION
12 WHEN HE WROTE SOME OF THOSE OTHER LETTERS THAT YOU'VE
13 POINTED OUT TO US?

14 A I THINK MR. MULL HAS SHOWN A REMARKABLE ABILITY
15 AT SELF-CONTROL AND AT BEING RATIONAL IN LETTERS HE WROTE
16 BEFORE AND AFTER THIS ONE. I AM NOT -- I DON'T THINK THIS
17 IS AN IRRATIONAL LETTER.

18 IS THAT YOUR IMPLICATION, THAT THOSE STATEMENTS
19 ARE NOT RATIONAL OR --

20 Q OKAY, DOCTOR. I SURRENDER. ALL I CAN DO IS
21 TRY TO ASK THE QUESTIONS.

22 YOU DON'T UNDERSTAND MY QUESTION WITH REGARD TO
23 THE FIRST PARAGRAPH? IS THAT WHAT YOU ARE SAYING?

24 A I AM WILLING TO LISTEN TO IT AGAIN.

25 Q OKAY. LET ME TRY ONE MORE TIME.

26 THE MAN IS COMPLAINING THAT HE'S BEEN SICK AND
27 HE'S BEEN WELL, HE'S BEEN UP AND HE'S BEEN DOWN. IS THAT
28 DESCRIPTIVE OF A MAN WHO IS IN A SITUATION THAT IS NOT

1 FRAUGHT WITH EMOTION AND CAPABLE OF KEEPING HIM FROM BEING
2 SO TOTALLY IRRATIONAL AS YOU DESCRIBE HIM IN ALL OF THE
3 LETTERS THAT PRECEDE THAT AND FOLLOW THAT?

4 A I AM NOT SAYING THAT MR. MULL DIDN'T HAVE
5 EMOTION WHEN HE WROTE A LOT OF THESE LETTERS. IN FACT QUITE
6 THE CONTRARY. HE -- HE IS SOMETIMES AN EMOTIONAL PERSON AND
7 THAT IT SHOWS IN THE LETTERS.

8 THE FACT THAT HE WAS SAYING THINGS WERE LIKE A
9 YO-YO HERE IN JUNE THE 5TH OF 1979, BY THAT TIME PERIOD, MR.
10 MULL HAD FOUND OUT THAT AGREEMENTS HE'D EITHER MADE OR
11 THOUGHT HE HAD MADE WERE NOT IN FACT THE CASE AND HE WAS
12 SUFFERING CONSIDERABLE DISQUIET ABOUT THAT WOULD BE HOW I
13 WOULD INTERPRET IT.

14 HE WAS INVOLVED IN REALIZING THAT SOME THINGS
15 WERE NOT LIKE HE THOUGHT AND HE WAS CONCERNED. SO I --
16 WE -- I THINK THE PARAGRAPH SUPPORTS THE KIND OF THEORY THAT
17 I HAVE LAID OUT HERE, AND YOU SEEM NOT TO AND I AM SORRY
18 THAT I CAN'T SEE YOUR POINT.

19 Q HAVE YOU EVER HEARD THE OLD SAYING, DOCTOR,
20 THOSE WHO CAN, DO; AND THOSE WHO CAN'T, TEACH?

21 NOTHING FURTHER, YOUR HONOR.

22 THE COURT: LET ME ASK A QUESTION.

23 THE WITNESS: CERTAINLY.

24 THE COURT: JUST TO BE SURE THAT I UNDERSTAND THIS
25 CLEARLY.

26 IS IT CORRECT THAT YOU YOURSELF HAVE NO OPINION
27 OR HAVE NO BASIS FOR AN OPINION AS TO WHETHER, BEFORE MR.
28 MULL WROTE THOSE NEGOTIATING INSTRUMENTS THAT YOU TALKED

1 ABOUT, HE AND THE CHURCH DID OR DID NOT HAVE A CLEAR
2 UNDERSTANDING OF THE CONDITIONS UNDER WHICH HE WOULD BE AT
3 CAMELOT?

4 THE WITNESS: I -- SOME OF THE LETTERS DATE BACK TO
5 1974. FIRST ONE I READ DATES BACK TO 1974. AND SOME OF
6 THOSE MADE VERY CLEAR STATEMENTS THAT HE HAS CERTAIN NEEDS
7 TO BE MET AND HE USES THE WORD "LOAN" IN THAT CONTEXT WITH
8 NO QUALIFICATION.

9 I TAKE THOSE TO MEAN THAT THAT IS WHAT HE
10 THOUGHT AT THE TIME UNLESS WE WANT TO MAKE A CASE, WHICH I
11 AM NOT PREPARED TO MAKE, THAT HE IS INVOLVED IN
12 DISSIMULATION. HE SAYS "LOAN" IN THOSE EARLY LETTERS. SO I
13 THINK HE HAD AN UNDERSTANDING THAT THEY WERE LOANING HIM
14 MONEY.

15 THE COURT: LET ME TRY ONE MORE TIME.

16 THE WITNESS: OKAY.

17 THE COURT: IS IT CORRECT THAT YOU ARE -- THAT YOU
18 HAVE NO BASIS FOR FORMING AN OPINION AS TO WHETHER MR. MULL
19 AND THE CHURCH UNIVERSAL AND TRIUMPHANT DID OR DID NOT HAVE
20 A FIRM UNDERSTANDING OF THE TERMS AND CONDITIONS UNDER WHICH
21 MR. MULL WOULD GO TO CAMELOT IN EARLY 1979 I BELIEVE --

22 MR. LEVY: JANUARY OF '79.

23 THE COURT: JANUARY OF '79. IS THAT A FAIR
24 STATEMENT?

25 THE WITNESS: THE ONLY BASIS I HAVE ARE THESE
26 LETTERS, AND THE SUMMARY OF THE DEPOSITIONS I READ, AND THE
27 TRANSCRIPT OF THAT MEETING AND HIS TESTIMONY. I DO NOT
28 CLAIM TO HAVE TALKED TO HIM OR CHURCH LEADERS, IN FACT I

1 JUST MET THEM TODAY, ABOUT ANY OF THIS.

2 THE COURT: OKAY. I AM NOT BEING CRITICAL.

3 THE WITNESS: OH, I DON'T THINK YOU ARE EITHER.

4 THE COURT: AND I DON'T WANT TO BE MISUNDERSTOOD. I
5 JUST WANT TO CLARIFY THE POINT THOUGH THAT I THOUGHT WAS THE
6 CASE, BUT I WANTED TO HEAR IT FROM YOU.

7 THE WITNESS: THE LAST PHRASING OF YOUR QUESTION WAS
8 VERY STRAIGHTFORWARD, AND I UNDERSTOOD IT AND THE ANSWER IS
9 I HAVE STATED MY OPINION ON IT.

10 THE COURT: AND THERE MAY OR MAY NOT BE OTHER
11 FACTORS?

12 THE WITNESS: THAT IS CERTAINLY POSSIBLE.

13 THE COURT: IMPACTING WHETHER OR NOT THEY HAD A CLEAR
14 AGREEMENT; AND IF THEY DID, WHAT THE TERMS OF THE AGREEMENT
15 ARE; AND IF THERE IS A PARTIAL UNDERSTANDING, WHAT THE TERMS
16 OF THAT PARTIAL UNDERSTANDING MIGHT HAVE BEEN?

17 THE WITNESS: THAT IS POSSIBLE. THE FACT THAT HE
18 WROTE SO MANY LETTERS TO ME IS VERY TELLING THAT HE WOULD
19 WRITE THINGS DOWN IN LETTERS. IT IS VERY UNUSUAL AND IT IS
20 QUITE AN INTERESTING DATA SET I AM SURE AS YOU ARE AWARE.

21 THE COURT: BUT YOU DID NOT SEEK TO GATHER TOGETHER
22 NECESSARILY EVERYTHING THAT MIGHT BEAR UPON WHETHER OR NOT
23 THERE WAS A CLEAR UNDERSTANDING AND AGREEMENT AMONG THEM?

24 THE WITNESS: NO. THAT -- THAT WOULD HAVE
25 INVOLVED --

26 THE COURT: YOUR EFFORTS WERE OTHERWISE.

27 THE WITNESS: RIGHT.

28 THE COURT: AND YOUR INTERESTS WERE OTHERWISE.

1 THE WITNESS: THAT'S RIGHT.

2 MR. LEVY: YOUR HONOR, IF I MAY AT THIS POINT. I AM
3 SOMEWHAT SOCIOLOGICALLY PSYCHOLOGIZED OUT AND MY THROAT IS
4 GIVING ME A PROBLEM. MR. MIDDLETON, MY ASSOCIATE, HAS ONE
5 OR TWO QUESTIONS WHICH MIGHT CLARIFY THE MATTER. I
6 WONDER --

7 THE COURT: ONE OR TWO?

8 MR. LEVY: SEVERAL.

9 MR. MIDDLETON: GIVE ME FIVE MINUTES, OKAY? IT IS
10 FOUR O'CLOCK.

11 THE COURT: LET'S GET IT DONE QUICKLY.

12 MR. MIDDLETON: THANK YOU, YOUR HONOR. I APPRECIATE
13 IT. I AM SORRY.

14

15 RE-CROSS-EXAMINATION +

16 BY MR. MIDDLETON:

17 Q YOU REFERRED -- JUST A MOMENT AGO YOU WERE
18 TALKING TO THE JUDGE, AND YOU TALKED ABOUT SEVERAL LETTERS
19 BETWEEN THAT PERIOD OF TIME JUNE AND GOING BACK TO 1974 THAT
20 REFERRED TO A LOAN.

21 NOW ARE YOU SURE THAT THERE WERE LETTERS GOING
22 BACK TO 1974, 1975, 1976, 1977, 1978 THAT REFERRED TO LOANS?

23 A WELL, MY RESPONSE TO THAT, IF I GIVE A TRUE
24 RESPONSE, IS THAT I NEED TO GO TO MY BRIEFCASE AND DIG OUT
25 THE TWO DOZEN LETTERS AND SHOW YOU -- I AM NOT PREPARED TO
26 SAY THAT IN EVERY ONE OF THOSE YEARS, THERE IS A LETTER THAT
27 USES THE WORD "LOAN."

28 I AM PREPARED TO SAY THAT IN SEVERAL LETTERS

1 DURING THAT INTERVENING TIME PERIOD, THAT KIND OF
2 PHRASEOLOGY APPEARS.

3 Q CAN I HELP YOU BY JUST TELLING YOU BEFORE YOU
4 GO TO YOUR BRIEFCASE BY TELLING YOU THAT THERE ARE NO
5 LETTERS IN THOSE PERIODS OF TIME UP TO 1979 THAT REFER TO
6 LOANS, NOT ONE TIME IS IT MENTIONED?

7 A WELL --

8 Q CAN I --

9 A YOU MAY SAY THAT IF YOU PLEASE.

10 Q OKAY. AND IF I SAY THAT ALL THE LETTERS ARE IN
11 EVIDENCE, AND WE HAVE ALL READ THEM AND I CAN PROBABLY GO SO
12 FAR AS TO GET A STIPULATION FROM COUNSEL HERE THAT THERE IS
13 NOT THE WORD "LOAN" MENTIONED IN ANY OF THOSE LETTERS, WOULD
14 YOU ACCEPT MY WORD AT THAT POINT?

15 A NO, BECAUSE I HAVE READ ABOUT 20 --

16 THE COURT: WHY DON'T YOU TAKE A MINUTE, GO TO YOUR
17 BRIEFCASE AND TRY TO DIG IT OUT.

18 Q BY MR. MIDDLETON: TRY AND DIG ME A LETTER
19 BEFORE FEBRUARY OF 1979 THAT REFERS TO "LOAN," JUST ONE
20 LETTER.

21 A WELL, MY BRIEFCASE IS OUT IN THE HALL.

22 THE COURT: GO AHEAD.

23 THE WITNESS: OKAY.

24 MR. LEVY: YOUR HONOR, I THINK MR. KLEIN AND I MAY
25 HAVE RESOLVED THE CONFUSION WITH RESPECT TO DATES.

26 THE COURT: OKAY.

27 MR. LEVY: MR. KLEIN, DO YOU WANT TO OFFER THE
28 STIPULATION?

1 MR. KLEIN: THE STIPULATION IS THAT THE FIRST LETTER
2 FROM MR. MULL THAT USES THE WORD "LOAN" IS DATED MARCH 18TH,
3 1979.

4 THE COURT: MARCH OF 1979?

5 MR. KLEIN: YES, MARCH 18TH OF 1979.

6 THE WITNESS: HERE IT IS, YOUR HONOR.

7 THE COURT: ALL RIGHT. IS THAT AGREEABLE?

8 MR. MIDDLETON: THAT IS AGREEABLE WITH ME, YOUR
9 HONOR.

10 MR. LEVY: YES, YOUR HONOR.

11 Q BY MR. MIDDLETON: THE FIRST TIME LOAN IS
12 MENTIONED IS MARCH 18TH OR 19TH, 1979. BACK TO THE LETTER
13 OF FEBRUARY 22ND, 1979.

14 IS IT YOUR POSITION THAT AT THAT PERIOD OF
15 TIME, MR. MULL IS RECONSTRUCTING?

16 A YES.

17 Q WHEN DOES IT TAKE PLACE WITH AN INDIVIDUAL?
18 WILL YOU TELL US THAT AGAIN, WHEN RECONSTRUCTION TAKES
19 PLACE? WHEN DOES HE START THAT RECONSTRUCTIVE BIOGRAPHY?

20 A WHEN -- ONE STATEMENT THAT I SHOULD START WITH
21 IS THAT RECONSTRUCTION OF BIOGRAPHY IS SOMETHING THAT IS IN
22 SOME SENSE A CONTINUAL PROCESS.

23 BUT WHEN YOU MAKE SOME KIND OF DRAMATIC CHANGE
24 IN OUR LIFE, WE ARE CONSIDERING MOVING OUT OF A GROUP OR
25 MOVING INTO A GROUP OR GETTING A DIVORCE OR GETTING MARRIED
26 OR SOMETHING OF THAT NATURE, PARTICULARLY WHERE THERE IS
27 SOME LEAVING OR SEVERING LIKE IN A DIVORCE SITUATION OR IN A
28 SITUATION WHERE SOMEONE IS LEAVING A POLITICAL GROUP OR

1 RELIGIOUS GROUP THAT THEY HAVE BEEN INVOLVED IN, THEN YOU
2 SEE DRAMATIC KINDS OF CHANGES TAKING PLACE IN ONE'S
3 PERSPECTIVE ABOUT THE KINDS OF THINGS THAT THEY WERE
4 INVOLVED IN BEFORE.

5 Q I UNDERSTAND WHAT YOU ARE SAYING.

6 AND AT THIS POINT IN FEBRUARY THEN OF 1979,
7 WOULD HE BE RECONSTRUCTING BECAUSE HE IS NOW COMING INTO THE
8 GROUP, OR WOULD HE BE RECONSTRUCTING BECAUSE HE IS LEAVING
9 HIS HOME IN SAN FRANCISCO OR IS HE RECONSTRUCTING BECAUSE HE
10 IS LEAVING THE GROUP?

11 A WELL, MR. MULL IS AN INTERESTING EXAMPLE OF
12 SOMEONE WHO HAS DONE A LOT OF LEAVING AND A LOT OF JOINING
13 OVER HIS LIFE AS I THINK YOU ARE AWARE.

14 AND IN THIS PARTICULAR TIME PERIOD, IT SEEMS TO
15 ME HE IS OBVIOUSLY MAKING SOME ARRANGEMENTS BOTH MENTALLY
16 AND PHYSICALLY TO CONSIDER GETTING OUT OF THE GROUP AS IS
17 DEMONSTRATED BY THIS LETTER. HE IS MAKING SOME -- WHAT ARE
18 SOMETIMES CALLED SIDE BETS.

19 Q THIS IS FEBRUARY 22ND OF 1979 HE IS MAKING
20 ARRANGEMENTS TO LEAVE THE GROUP; IS THAT WHAT YOU ARE
21 SAYING?

22 A IT SEEMS TO ME THAT HE IS DEMONSTRATING THAT HE
23 IS NOT NECESSARILY MAKING EXPLICIT ARRANGEMENTS TO LEAVE THE
24 GROUP AS MUCH AS HE IS PUTTING OUT SOME OFFERS HERE AND
25 DOING SOME NEGOTIATING WITH THE GROUP. AND WHAT HE DOES
26 NEXT WILL DEPEND UPON HOW THE GROUP AND ITS LEADERS RESPOND
27 TO THIS INSTRUMENT.

28 Q ARE YOU AWARE OF HOW LONG HE LIVED AT CAMELOT

1 AT THAT PERIOD OF TIME? ON FEBRUARY 22ND, DO YOU KNOW HOW
2 LONG HE HAD BEEN ON CAMPUS AT CAMELOT?

3 A HE SPENT SEVERAL MONTHS THERE. I THINK ABOUT
4 NINE MONTHS, DIDN'T HE?

5 Q WOULD YOU CARE TO KNOW THAT HE MOVED IN JANUARY
6 11TH OF 1979 AND WE ARE TALKING FIVE WEEKS LATER?

7 A FIVE WEEKS LATER?

8 Q FIVE WEEKS LATER.

9 A YES. IS THAT --

10 Q HE LIVED THERE UNTIL JUNE OF 1980.

11 A YES.

12 Q OKAY. SO FIVE WEEKS AFTER HE MOVES IN, HE IS
13 MAKING EFFORTS TO LEAVE THE GROUP; IS THAT WHAT YOU ARE
14 SAYING?

15 A HE IS MAKING OFFERS TO THE GROUP AND INVOLVED
16 IN NEGOTIATION. HE'S COME THERE, HE'S LIVED THERE FOR FOUR
17 OR FIVE WEEKS, SOME THINGS ARE OBVIOUSLY NOT WHAT HE HAD
18 EXPECTED AND HE'S PUTTING FORWARD A KIND OF NEGOTIATING
19 INSTRUMENT.

20 Q AND AT THIS POINT, ARE YOU CALLING THIS
21 RECONSTRUCTIVE BIOGRAPHY?

22 A THE RECONSTRUCTION OF BIOGRAPHY WOULD ACTUALLY
23 IN A SENSE REACH A PLACE WHERE YOU MIGHT SAY IT IS COMPLETED
24 AFTER SOMEONE HAS LEFT A GROUP. RIGHT NOW HE IS INVOLVED IN
25 NEGOTIATION PROCESS THAT WOULD PRECEDE THAT. IT IS NOT A --
26 THERE IS IN THE -- A TIME LINE THAT YOU CAN DRAW BETWEEN
27 THESE KIND OF THINGS.

28 THERE IS A PROCESS OF NEGOTIATION THAT GOES ON

1 AS A PERSON IS ENTERING A GROUP, LIVING WITHIN A GROUP.
2 PARTICULARLY IF SOME THINGS ARE HAPPENING THEY ARE NOT VERY
3 HAPPY WITH, THEN WHEN THEY LEAVE THE GROUP, PARTICULARLY
4 WHEN THEY MOVE INTO A NEW REFERENCE GROUP SITUATION LIKE
5 THEY MOVE BACK INTO FAMILY SITUATION, MOVE BACK WITH THEIR
6 PARENTS OR SOMETHING, THEN THEY HAVE TO COME UP WITH SOME
7 KIND OF AN ACCOUNT OF WHAT IT WAS THEY DID DURING THAT TIME
8 PERIOD.

9 Q THIS IS A PERIOD OF NEGOTIATION THEN?

10 A THAT'S RIGHT.

11 Q SO FEBRUARY 22ND IS NOT RECONSTRUCTIVE
12 BIOGRAPHY?

13 A IT IS LAYING THE GROUNDWORK FOR IT.

14 Q AND WHEN HE MOVED TO CAMELOT ON JANUARY 11TH,
15 YOU WILL READ THAT ON THE FIRST PAGE OF THAT PARAGRAPH, HE
16 SAYS "WHEN MONROE CALLED ME AND ASKED ME TO COME . . . TO
17 CAMELOT ON MY TERMS," WHICH IS JUST FIVE WEEKS PRIOR TO
18 THAT, WAS HE LAYING NEGOTIATIONS WHEN HE MOVED INTO CAMELOT
19 JUST FIVE WEEKS EARLIER?

20 A I THINK SO.

21 Q AND HE WAS LAYING NEGOTIATIONS TO DO WHAT WHEN
22 HE MOVED IN FIVE WEEKS EARLIER? TO LEAVE THE GROUP?

23 A I THINK THAT HE WAS VERY INTERESTED IN DOING A
24 LOT OF ARCHITECTURAL WORK THERE AND WOULD LIKE TO HAVE SEEN
25 HIS WORK USED THERE. AND HE IS OFFERING TO DO IT FOR -- HE
26 LISTS -- THIS IS A PARAGRAPH THAT LISTS THE \$2,000 PER MONTH
27 THAT IT WOULD TAKE FOR HIM TO DO THAT. (READING.)

28 "I SAID I COULD ONLY COME AT

1 ONCE IF MY MONTHLY BILLS WERE MET, WHICH
2 RUNS ABOUT \$2,000 PER MONTH."

3 Q I UNDERSTAND THAT.

4 A THEN HE OFFERS TO SELL HIS HOUSE LATER IN THE
5 PARAGRAPH.

6 Q THE POINT THAT YOU STATED EARLIER IS HE IS
7 PLANNING ON LEAVING THE GROUP, THIS IS NEGOTIATION PRIOR TO
8 RECONSTRUCTIVE BIOGRAPHY. IS THAT REALLY WHAT IS HAPPENING
9 HERE, OR IS HE NEGOTIATING TO BE WITHIN THIS GROUP AND TO
10 STAY THERE?

11 A THE NEGOTIATIONS CAN FAIL OR SUCCEED FROM HIS
12 POINT OF VIEW.

13 Q OKAY. BUT AT THIS POINT ON FEBRUARY 22ND,
14 BEFORE YOU USED THE TERM "RECONSTRUCTIVE BIOGRAPHY," ARE YOU
15 SAYING IT DOES NOT APPLY NOW AND IT IS ONLY NEGOTIATION AT
16 THIS POINT?

17 A NO, I AM NOT SAYING THAT.

18 Q ON JANUARY 11TH, WHEN HE MOVES IN, IS IT
19 RECONSTRUCTIVE BIOGRAPHY OR NEGOTIATION?

20 A YOU ARE TRYING TO CHARACTERIZE THE NEGOTIATION
21 PROCESS AND THE RECONSTRUCTION PROCESS AND TWO TOTALLY
22 DIFFERENT THINGS.

23 Q I WOULD LIKE TO GET SOME CLARITY AS TO WHAT IT
24 ALL IS. I AGREE WITH YOUR FIRST STATEMENT THAT
25 RECONSTRUCTIVE BIOGRAPHY GOES ON THROUGHOUT OUR LIFE AS WE
26 ATTAIN NEW KNOWLEDGE.

27 A THAT'S RIGHT. IN CERTAIN KINDS OF TRAUMATIC
28 SEVERANCES IN RELATIONSHIPS, WE HAVE TO COME TO A FULL AND

1 LOGICALLY AND CONSISTENT ACCOUNT AND THAT WOULD OCCUR
2 AFTERWARD. PEOPLE ARE BUILDING TOWARD THAT IF THESE
3 NEGOTIATIONS FAIL --

4 Q I DON'T MEAN TO CUT YOU OFF, BUT WE HAVE SAID
5 THAT.

6 ONE THING I WOULD LIKE TO GET CLEAR IS YOU SAY
7 IN CERTAIN TRAUMATIC SEVERANCES IS RECONSTRUCTIVE BIOGRAPHY.
8 IN CERTAIN TRAUMATIC COMING TOGETHER IN THE BEGINNING OF NEW
9 RELATIONSHIPS IN THE BEGINNING OF NEW IDEAS, WOULD
10 RECONSTRUCTIVE BIOGRAPHY TAKE PLACE THEN ALSO?

11 A THAT PROCESS WOULD WORK THERE BECAUSE YOU WOULD
12 BE LEAVING SOMETHING ELSE.

13 MR. MIDDLETON: I HAVE NO FURTHER QUESTIONS.

14 THANK YOU, YOUR HONOR.

15 THE COURT: WHAT DO YOU MAKE OF THE WORDS, "WHEN
16 MONROE . . . ASKED ME TO COME . . . ON MY TERMS," RELATIVE
17 TO WHAT YOU'VE JUST BEEN DISCUSSING?

18 THE WITNESS: I THINK THAT HE IS OFFERING THAT AS HIS
19 INTERPRETATION OF WHAT -- OF SOME CONVERSATION THAT HE AND
20 MONROE HAD HAD.

21 THE COURT: WHICH MAY OR MAY NOT BE REALISTIC OR
22 ACCURATE OR FACTUAL?

23 THE WITNESS: THAT'S RIGHT.

24 THE COURT: AS FAR AS YOU AND I KNOW.

25 THE WITNESS: HE IS TRYING IT OUT. HE IS WRITING IT
26 DOWN TO SEE IF IT FLIES. IF IT FLIES, FINE. BUT THAT --
27 THAT IS HIS INTERPRETATION.

28 IT IS A LITTLE LIKE ME GOING SOMEWHERE, AND

1 HAVING A BUSINESS CONFERENCE WITH SOMEONE, AND WRITING A
2 LETTER SAYING WHAT MY UNDERSTANDING OF THE CONFERENCE IS
3 AFTERWARD AND PUT IT INTO WRITING.

4 THE COURT: BUT WHEN YOU DO THAT, YOUR RECITATION MAY
5 BE COMPLETELY FAITHFUL AND ACCURATE.

6 THE WITNESS: THAT'S RIGHT. IT COULD BE.

7 THE COURT: OR PERHAPS IT MIGHT NOT BE.

8 THE WITNESS: OR PERHAPS IT MIGHT NOT BE.

9 MR. KLEIN: I JUST HAVE ONE OR TWO QUESTIONS, YOUR
10 HONOR.

11 THE COURT: ONE. THAT IS WHAT YOU ARE GOING TO GET
12 AND THEN WE ARE GOING TO RESUME ON MONDAY WITH OR WITHOUT
13 DR. RICHARDSON.

14 MR. KLEIN: TWO? CAN WE NEGOTIATE ON THAT?

15 THE COURT: HE HAS BEEN REVISING HIS BIOGRAPHY FOR A
16 MONTH NOW.

17 THE WITNESS: CERTAINLY HAS.

18 MR. KLEIN: CAN I NEGOTIATE FOR TWO?

19 THE COURT: TWO. LET'S GO.

20

21 FURTHER REDIRECT EXAMINATION +

22 BY MR. KLEIN:

23 Q DOES THE FACT THAT THE LOAN WAS FIRST MENTIONED
24 IN THE MARCH 18TH, 1979, LETTER IN ANY WAY CHANGE ANY OF THE
25 CONCLUSIONS YOU'VE TOLD US TODAY?

26 A NO.

27 Q AND SECONDLY AS FAR AS THE NEGOTIATION, DOES IT
28 MATTER WHETHER HE IS RIGHT OR WHETHER HE IS WRONG AS FAR AS

1 THE CONCLUSION YOU GAVE US AS TO WHAT NEGOTIATION TELLS YOU
2 AS A SOCIOLOGIST ABOUT MR. MULL AND HIS EITHER PASSIVITY OR
3 ACTIVITY IN THE GROUP?

4 A THE FACT THAT SUCH RATIONAL ARTICULATE
5 NEGOTIATING WAS GOING ON TO ME CLEARLY DEMONSTRATES THAT HE
6 WAS IN CONTROL OF HIMSELF AND TRYING TO AFFECT THE SITUATION
7 IN A VERY ACTIVE WAY.

8 MR. KLEIN: THANK YOU.

9 I HAVE NO FURTHER QUESTIONS.

10 MR. LEVY: I WOULDN'T DARE TO ASK ANOTHER QUESTION.

11 THE COURT: IF YOU DO, YOU ARE GOING TO DO IT ON YOUR
12 OWN TIME, NOT OURS.

13 9:15 MONDAY.

14 (AT 4:16 P.M., AN ADJOURNMENT WAS TAKEN
15 UNTIL MONDAY, MARCH 17, 1986, AT
16 9:15 A.M.)

17
18
19
20
21
22
23
24
25
26
27
28

1 LOS ANGELES CALIFORNIA; MONDAY MARCH 17 1986 *

2 9:50 A M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 THE COURT: GOOD MORNING.

7 I AM SORRY WE ARE STARTING A FEW MOMENTS LATER
8 THAN WE EXPECTED. COUNSEL AND I HAVE HAD A MEETING THE
9 RESULT OF WHICH MIGHT BE TO SHORTEN THE TRIAL JUST A BIT.
10 SO I THINK IT WAS WORTHWHILE OKAY.

11 PLEASE PROCEED.

12 MR. KLEIN: YOUR HONOR BEFORE I CALL MY NEXT
13 WITNESS, WE HAVE REACHED A STIPULATION WHICH I WOULD LIKE TO
14 TELL THE COURT AT THIS TIME.

15 THE COURT: ALL RIGHT.

16 MR. KLEIN: COUNSEL HAVE STIPULATED THAT THE
17 FOLLOWING DOCUMENTS WERE WRITTEN BY MR. MULL AND THAT THEY
18 SHOULD BE RECEIVED IN EVIDENCE AT THIS TIME. AND I WILL
19 GIVE THE NUMBER AND THE DATE OF THE LETTERS.

20 ONE IS A LETTER WRITTEN -- NUMBER 36 FOR
21 IDENTIFICATION AND IT IS A LETTER DATED OCTOBER 17TH, 1974.

22 SECOND, A NUMBER 61 FOR IDENTIFICATION, AND IT
23 IS A LETTER DATED OCTOBER 27TH, 1979.

24 THIRD IS A MEMO DATED -- NUMBER 66 FOR
25 IDENTIFICATION, DATED DECEMBER 11TH, 1979.

26 FOURTH IS NUMBER 74 FOR IDENTIFICATION. IT IS
27 A LETTER DATED APRIL 20TH, 1980

28 AND FIFTH IS NUMBER 75 FOR IDENTIFICATION. IT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IS A LETTER DATED APRIL 23RD, 1980.

THE COURT: THAT AGREEABLE?

MR. LEVY: YES, YOUR HONOR, THAT'S AGREEABLE.

THE COURT: ALL RIGHT. EXHIBITS 36, 61, 66, 74 AND
75 ARE RECEIVED.

(RECEIVED EVID: ^ EXHIBIT 36, LETTER

- - - - - ^ DATED 10-17-74)

(RECEIVED EVID: ^ EXHIBIT 61, LETTER

- - - - - ^ DATED 10-27-79)

(RECEIVED EVID: ^ EXHIBIT 66, MEMO

- - - - - ^ DATED 12-11-79)

(RECEIVED EVID: ^ EXHIBIT 74, LETTER

- - - - - ^ DATED 4-20-80)

(RECEIVED EVID: ^ EXHIBIT 75, LETTER

- - - - - ^ DATED 4-23-80)

MR. KLEIN: I WOULD CALL AT THIS TIME DR. KATZ YOUR
HONOR.

IRVING STANLEY KATZ +

A PLAINTIFF'S WITNESS HAVING BEEN FIRST DULY SWORN.

TESTIFIES AS FOLLOWS:

THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.

SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL
YOUR NAME.

THE WITNESS: IRVING STANLEY KATZ I-R-V-I-N-G;
STANLEY S-T-A-N-L-E-Y; KATZ, K-A-T-Z.

THE CLERK: THANK YOU.

///

DIRECT EXAMINATION +

1
2 BY MR. KLEIN:

3 Q WHAT IS A HYPNOTHERAPIST?

4 A WELL HYPNOTHERAPIST BASICALLY IS SOMEONE WHO
5 IS --

6 MR. LEVY: EXCUSE ME SIR.

7 I AM GOING TO OBJECT AT THIS TIME. YOUR HONOR.
8 THERE IS NO FOUNDATION THAT THIS WITNESS HAS ANY KNOWLEDGE
9 OR ANYTHING ELSE ABOUT HYPNOSIS AT THIS POINT.

10 THE COURT: SUSTAINED.

11 Q BY MR. KLEIN: WHAT IS YOUR EDUCATIONAL
12 BACKGROUND SIR?

13 A WELL I RECEIVED MY BACHELOR'S DEGREE FROM
14 MICHIGAN STATE UNIVERSITY, 1950. MY MASTER'S OF SCIENCE
15 DEGREE IN PSYCHOLOGY FROM PENNSYLVANIA STATE UNIVERSITY IN
16 1951 AND THEN I RECEIVED MY DOCTOR DEGREE IN CLINICAL
17 PSYCHOLOGY FROM MICHIGAN STATE UNIVERSITY IN 1956.

18 Q WHAT, IF ANY, EDUCATIONAL BACKGROUND DO YOU
19 HAVE AS A HYPNOTIST?

20 A WELL, BASICALLY MY TRAINING STARTED IN 1958
21 WHERE I WAS TRAINED BY SUCH INDIVIDUALS AS DR. DAVID CHEEK,
22 DR. STOLHEIZER, DR. LE CRON, AND THEN RECEIVED EXTENSIVE
23 EDUCATION -- CONTINUING EDUCATION PROGRAMS AT A.P.A.,
24 AMERICAN PSYCHOLOGICAL ASSOCIATION, CONTINUING EDUCATION
25 PROGRAMS.

26 I HAVE BEEN TRAINED BY DR. MILTON ERICKSON, WHO
27 IS PROBABLY THE FOREMOST OR GENERALLY RECOGNIZED AS THE
28 FOREMOST HYPNOTHERAPIST. AND EXTENSIVE TRAINING IN PROGRAMS

1 AT, OH, VARIOUS UNIVERSITIES AND, OF COURSE, I ALSO TEACH
2 HYPNOSIS AT VARIOUS UNIVERSITIES.

3 Q CAN YOU GIVE US YOUR PROFESSIONAL BACKGROUND?

4 A YES. PRESENTLY I AM INSTRUCTOR AT THE
5 PROFESSIONAL SCHOOL OF PSYCHOLOGICAL STUDIES. IN FACT,
6 COINCIDENTALLY, I TAUGHT THIS WEEKEND IN LOS ANGELES AT OUR
7 CAMPUS THERE. AND I ALSO TEACH AT THE UNIVERSITY OF
8 HUMANISTICS STUDIES. I TAUGHT HYPNOSIS AT THE UNIVERSITY OF
9 HOUSTON, MICHIGAN STATE UNIVERSITY. I AM A FORMER CHAIRMAN
10 OF THE DEPARTMENT OF PSYCHOLOGY AT UNIVERSITY OF NEVADA

11 I WAS A MEMBER OF THE STATE BOARD OF
12 PSYCHOLOGICAL EXAMINERS FOR TEN YEARS IN NEVADA, WHICH IS A
13 LICENSING BOARD FOR CLINICAL PSYCHOLOGISTS IN THAT STATE,
14 AND I AM A LICENSED CLINICAL PSYCHOLOGIST WITH THE STATE OF
15 NEVADA.

16 Q HOW MANY YEARS HAVE YOU BEEN TEACHING HYPNOSIS?

17 A BASICALLY I HAVE BEEN TEACHING HYPNOSIS FOR THE
18 PAST 25 YEARS.

19 Q AND HOW MANY YEARS HAVE YOU BEEN PRACTICING
20 HYPNOSIS?

21 A TWENTY-EIGHT YEARS.

22 Q WHAT IS A HYPNOTHERAPIST?

23 A WELL, HYPNOTHERAPIST IS BASICALLY SOMEONE WHO
24 SPECIALIZES IN HYPNOTHERAPY. IN THE STATE OF CALIFORNIA,
25 THAT CAN VARY EXTENSIVELY FROM SOMEONE WHO IS EITHER A
26 LICENSED CLINICAL PSYCHOLOGIST, OR LICENSED MARRIAGE AND
27 FAMILY COUNSELOR, OR LICENSED PHYSICIAN OR A LICENSED
28 DENTIST OR SOMEONE WHO OBTAINED TRAINING THROUGH A PROGRAM

1 APPROVED BY THE STATE BOARD OF EDUCATION TO BE CALLED A
2 HYPNOTHERAPIST.

3 Q ARE YOU PERSONALLY INVOLVED IN ANY TRAINING
4 PROGRAMS OF MARRIAGE/FAMILY CHILD COUNSELORS IN THE USE OF
5 HYPNOSIS?

6 A YES. ONE -- THE FUNCTIONS THAT I HAVE IS
7 TRAINING MARRIAGE AND FAMILY COUNSELORS IN BEING ABLE TO
8 UTILIZE HYPNOSIS WITHOUT SUPERVISION. CONSEQUENTLY, I DO
9 CERTIFY IS ONE OF THE REASONS I AM TEACHING THIS COURSE THIS
10 WEEKEND, MARRIAGE AND FAMILY COUNSELORS IN THE THEORY AND
11 THE APPLICATION OF HYPNOSIS. SO THAT IF THEY PASS THE
12 COURSE THAT I GIVE, THEY ARE ABLE TO PRACTICE HYPNOSIS AS
13 PART OF THEIR MARRIAGE AND FAMILY COUNSELING CERTIFICATION.

14 Q DO YOU TEACH ANY OTHER PROFESSIONALS,
15 PSYCHOLOGISTS, FOR EXAMPLE, IN THE USE OF HYPNOSIS IN THEIR
16 PRACTICE?

17 A YEAH. I THINK MY BASIC FUNCTION OR POSITION
18 RIGHT NOW IS WORKING WITH GRADUATE STUDENTS IN PSYCHOLOGY
19 AND TRAINING THEM IN THE USE OF HYPNOSIS IN THEIR FUTURE
20 PRACTICE.

21 Q HAVE YOU RECEIVED ANY HONORS OR AWARDS IN THE
22 FIELD OF PSYCHOLOGY?

23 A YES. I AM A MEMBER OF -- I GRADUATED MAGNA CUM
24 LAUDE FROM MICHIGAN STATE, A MEMBER OF PSI CHI HONORARY
25 SOCIETY.

26 I RECENTLY WAS ASKED TO GIVE A PRESENTATION ON
27 THE USE OF HYPNOTHERAPY AT THE LOCAL CHAPTER OF THE SOCIETY
28 OF CLINICAL HYPNOSIS, WHICH IS ONE OF THE TWO LEADING BODIES

1 WHERE LICENSED PSYCHOLOGISTS, PHYSICIANS AND DENTISTS BELONG
2 TO.

3 Q HAVE YOU EVER TESTIFIED AS A -- IN COURT AS AN
4 EXPERT WITNESS IN HYPNOSIS?

5 A YEAH. I WORKED AS AN EXPERT WITNESS IN THE
6 STATE OF CALIFORNIA ON OCCASIONS, PARTICULARLY IN SAN
7 FRANCISCO WHERE I WAS ASKED TO WORK WITH A PERSON REFERRED
8 TO AS A NOB HILL RAPIST TO ASSIST HIM IN RECOVERING SOME
9 AMNESIAC MEMORIES.

10 I ALSO WORKED WITH THE DISTRICT ATTORNEY IN
11 CLARK COUNTY, NEVADA, USING HYPNOSIS AS AN INVESTIGATIVE
12 TOOL.

13 Q WHAT IS HYPNOSIS?

14 A WELL, BASICALLY HYPNOSIS IS A TRANCE STATE AN
15 INDIVIDUAL GETS INTO AS A RESULT OF A HYPNOTIC INDUCTION.
16 THE TRANCE STATE INVOLVES WHAT WE CALL THE CONSCIOUS PART OF
17 THE INDIVIDUAL CORTICAL ACTIVITY BECOMING DEPRECIATED,
18 NAMELY, HAVING LESS POWER, AND THEREFORE THE UNCONSCIOUS
19 PART, SUBCORTICAL ACTIVITIES, BECOME MORE ATTENTIATED (SIC).

20 YOU HAVE THE AVAILABILITY OF BOTH THE RESOURCES
21 OF THE UNCONSCIOUS AS WELL AS THE FACT THAT THE OBSERVING
22 THE EGO CONSCIOUS STATE IS STILL THERE.

23 IN OTHER WORDS, THE PROCESS OF INDUCTION OF
24 BYPASSING THE CONSCIOUS SELF, THE CRITICAL FACULTIES WOULD
25 NOT BE THE ELIMINATION THEREOF. YOU HAVE MULTILEVEL STATES
26 OF CONSCIOUS LEVEL OCCURRING WHERE THE PERSON IS BOTH IN A
27 STATE OF UNCONSCIOUS ACTIVITY AS WELL AS THE STATE OF
28 CONSCIOUS ACTIVITY.

1 Q MAYBE YOU COULD JUST EXPLAIN WHAT YOU MEAN WHEN
2 YOU SAY THAT IT INVOLVES THE BYPASSING OF THE CRITICAL
3 FACULTY, BUT NOT THE ELIMINATION?

4 A IN OTHER WORDS, YOU ARE DEALING REALLY WITH A
5 PROCESS WE CALLED DISASSOCIATION, NAMELY, WHERE THE
6 CONSCIOUS PART THROUGH VARIOUS INDUCTION PROCEDURES WILL
7 WILL BECOME LESS PROMINENT IN THE INDIVIDUAL.

8 AND THE PURPOSE OF THAT IS TO ALLOW THE
9 UNCONSCIOUS PART, THE SUBCORTICAL PART, TO COME FORWARD, THE
10 PART THAT CONTROLS PAIN, OUR INTUITIVE ASPECT. THE PURPOSE
11 BASICALLY OF HYPNOSIS IS NOT TO CONTROL AN INDIVIDUAL AS
12 MUCH AS IT IS TO EMPOWER THEM TO COME FORWARD WITH CERTAIN
13 RESOURCES THAT ORDINARILY THEY DON'T HAVE AVAILABLE TO THEM.

14 THAT IS WHY I USE IT IN MY PRACTICE, THAT IS
15 WHY I TEACH PEOPLE TO USE IT. IT IS A VERY VALUABLE STATE
16 TO BE IN.

17 Q I WOULD ASSUME THAT MOST OF US HAVE NOT BEEN
18 UNDER HYPNOSIS.

19 CAN YOU GIVE US SOME SITUATIONS THAT WE MIGHT
20 BE MORE FAMILIAR WITH WHERE AN INDIVIDUAL IS IN A STATE
21 EITHER EQUAL TO OR VERY SIMILAR TO A HYPNOTIC STATE?

22 A I USUALLY TELL MY CLASS WHEN YOU HAVE DRIVEN
23 YOUR CAR FROM ONE PLACE TO ANOTHER, AND YOU FIND YOU HAVE
24 DONE THAT MANY, MANY TIMES, AND YOU ALL OF A SUDDEN REALIZE
25 THAT YOU DON'T KNOW HOW YOU GOT FROM ONE PLACE TO ANOTHER,
26 YOU HAVE BEEN ABSORBED IN YOUR THOUGHTS OR YOUR ACTIVITY,
27 YOU GENERALLY HAVE BEEN IN SOMETHING VERY SIMILAR TO A
28 TRANCE STATE.

1 OR WHEN YOU GET DEEPLY ABSORBED IN A BOOK OR
2 MOVIE OR TV PROGRAM, YOU ARE ACTUALLY IN A TRANCE STATE.

3 Q ARE INDIVIDUALS MORE GULLIBLE WHEN THEY ARE IN
4 A HYPNOTIC STATE?

5 A NOT NECESSARILY. I THINK THAT IS WHERE THE
6 CONFUSION LIE. IT IS ONE OF THE COMMON MISCONCEPTIONS AND
7 THAT IS THAT GULLIBILITY IS EQUATED WITH SUGGESTIBILITY. IT
8 IS TRUE YOU ARE IN A STATE OF HYPERSUGGESTIBILITY. IN OTHER
9 WORDS, SUGGESTIONS GIVEN TO YOU YOU CAN RECEIVE AND ACT ON
10 IF YOU WANT TO. BUT IT DOESN'T MEAN THAT YOU ARE GULLIBLE.
11 YOU ARE NOT NECESSARILY GOING TO BE A HELPLESS ROBOT BECAUSE
12 YOU ARE GOING TO BE IN A TRANCE STATE.

13 I WOULD BE MUCH MORE EFFECTIVE WORKING WITH MY
14 CLIENTS LOSING WEIGHT OR STOPPING SMOKING IF SOMEHOW THERE
15 WAS A LEVEL AT WHICH THEY WOULD JUST AUTOMATICALLY RESPOND
16 TO SUGGESTIONS I GIVE THEM OR ANY HYPNOTIST GIVES THEM.

17 Q ARE INDIVIDUALS WHO ARE HYPNOTIZED, CAN THEY BE
18 MADE TO DO THINGS AGAINST THEIR ETHICAL AND MORAL JUDGMENTS?

19 A AS A RULE, NOT SO. WHAT YOU FIND IS THAT THE
20 OBSERVING EGO STILL THERE, STILL THERE IN A PROTECTIVE
21 FUNCTION. CONSEQUENTLY, IF YOU ARE ASKED TO DO SOMETHING
22 THAT WOULD BE REPUGNANT TO YOU, SOMETHING THAT WOULD BE VERY
23 MUCH AGAINST YOUR MORAL JUDGMENT OR YOUR WILL, THE CHANCES
24 ARE YOU WOULD EITHER REFUSE TO DO IT OR WAKE UP FROM DOING
25 IT.

26 IT IS INTERESTING I WAS JUST READING A -- IF I
27 MAY QUOTE FROM A BOOK. THIS IS A BOOK BY -- I USE THIS IN
28 MY CLASSES, I CALL "A HANDBOOK OF HYPNOSIS FOR

1 PROFESSIONALS" BY ROY UDOLF, WHO IS BOTH A LAWYER AS WELL AS
2 A CLINICAL PSYCHOLOGIST.

3 AND HE TALKS ABOUT THE MISCONCEPTIONS THAT
4 INDIVIDUALS HAVE REGARDING HYPNOSIS. AND MISCONCEPTION
5 NUMBER 6, AND THIS IS ON PAGE 15: (READING.)

6 "THE SUBJECT IS UNDER THE
7 CONTROL OF THE HYPNOTIST AND CAN BE MADE TO
8 DO THINGS THAT HE ORDINARILY WOULDN'T DO OR
9 EVEN REVEAL SECRETS."

10 AND HE SAYS, "SUFFICE IT TO SAY
11 THAT THE WEIGHT OF THE EVIDENCE SEEMS TO
12 SUPPORT THE NOTION THAT IF A SUBJECT IS
13 DIRECTLY REQUESTED TO DO SOMETHING THAT IS
14 OBJECTIONABLE TO HIM, HE WILL SIMPLY REFUSE
15 TO DO IT OR IN SOME CASES AWAKEN FROM THE
16 TRANCE."

17 AND HE GOES ON, OF COURSE, TO GIVE QUITE A BIT
18 OF EVIDENCE FROM A LEGAL STANDPOINT SUPPORTING THAT
19 PARTICULAR POSITION.

20 Q HAVE YOU HAD AN OPPORTUNITY TO READ THE
21 TRANSCRIPT OF THE TESTIMONY OF MRS. KATHLEEN LEVY IN THIS
22 TRIAL?

23 A YES, I HAVE.

24 Q AND DO YOU RECALL SHE WAS GIVEN A RATHER
25 LENGTHY HYPOTHETICAL QUESTION DURING THE COURSE OF HER
26 DIRECT EXAMINATION?

27 A UH-HUH.

28 Q AND I AM GOING TO READ FOR YOU FROM PAGE 102 OF

1 THE TRANSCRIPT, LINE 24 TO LINE 27, HER RESPONSE OR OPINION
2 AFTER BEING GIVEN THAT LENGTHY HYPOTHETICAL. THERE WAS MORE
3 TO HER OPINION, BUT I WANT YOU TO JUST CONCENTRATE ON THIS
4 FIRST PART. SHE WAS ASKED BY MR. MIDDLETON: (READING.)

5 "WHAT IS THAT OPINION?"

6 THE ANSWER AFTER HER OPINION AS
7 TO WHAT THAT HYPOTHETICAL WOULD CAUSE,
8 THAT -- "THAT THAT WOULD INSTILL FEAR, THAT
9 A PERSON DOING THAT WOULD HAVE AUTHORITY AND
10 CONTROL OVER THAT INDIVIDUAL THROUGH FEAR
11 THAT THAT WOULD BE LIKE WHAT HYPNOTISTS CALL
12 A SHOCK INDUCTION."

13 NOW, YOU'VE READ THAT HYPOTHETICAL QUESTION?

14 A UH-HUH.

15 Q AND DO YOU AGREE WITH THE CONCLUSION REACHED BY
16 MRS. LEVY THAT IF ALL THOSE FACTORS IN THAT HYPOTHETICAL
17 WERE PRESENT, THAT IT WOULD INSTILL FEAR IN THE PERSON DOING
18 IT, BUT HAVE AUTHORITY AND CONTROL OVER THE INDIVIDUAL
19 THROUGH FEAR?

20 A WELL, I PERSONALLY WOULD NOT DRAW A CONCLUSION
21 LIKE THAT. THE WHOLE IDEA OF SHOCK INDUCTION -- WE DON'T
22 USE THE WORD "SHOCK INDUCTION." WE MAY USE INDUCTION
23 PROCEDURES THAT INVOLVE RAPID INDUCTION PROCEDURES OR USE
24 SURPRISE WHERE SHOCK COULD BE PART OF IT.

25 BUT IF THE INDIVIDUAL IS INDUCED INTO A STATE
26 OF HYPNOSIS WHATEVER THE MEANS, WHETHER IT BE SHOCK OR
27 WHETHER IT BE ANY OTHER PARTICULAR PROCEDURE, IT DOESN'T
28 AUTOMATICALLY RESULT IN THE INDIVIDUAL BEING IN A STATE

1 WHERE THEY ARE RENDERED HELPLESS OR RENDERED UNDER THE
2 CONTROL OF SOMEBODY ELSE.

3 IN OTHER WORDS, THEY STILL HAVE THEIR OBSERVING
4 EGO PRESENT, WHAT DR. ERNEST HILEGARD REFERS TO AS THE
5 HIDDEN OBSERVER, THAT CAN COME IN AT ANY PARTICULAR POINT TO
6 NEGATE WHATEVER SUGGESTIONS, WHATEVER INFLUENCE THE PERSON
7 MIGHT HAVE OVER YOU. IN OTHER WORDS, SHOCK INDUCTION DOES
8 NOT AUTOMATICALLY RESULT IN A PERSON GETTING INTO A STATE OF
9 FEAR.

10 I USE SHOCK INDUCTION, AS I DEMONSTRATED OVER
11 THIS WEEKEND, AND THE PURPOSE ACTUALLY OF THAT PARTICULAR
12 INDUCTION WAS TO DEMONSTRATE HOW YOU CAN GET INTO A TRANCE
13 STATE RATHER EASILY AND QUICKLY.

14 AND THE WAY I UTILIZE IT WAS NOT TO INDUCE
15 FEAR, BUT TO EMPOWER THE INDIVIDUAL TO DEMONSTRATE CERTAIN
16 PROCEDURES THEY COULD BYPASS THEIR RESISTANCE OR THAT THEY
17 COULD GO INTO A TRANCE STATE, WHICH AGAIN I WILL REPEAT
18 REALLY PUTS A PERSON IN MANY INSTANCES A MORE RESOURCEFUL
19 STATE RATHER THAN IN A SVENGALI-LIKE VICTIM STATE.

20 Q IN PREPARATION FOR YOUR TESTIMONY TODAY, HAVE
21 YOU HAD AN OPPORTUNITY TO HEAR A TAPE OF DECREEING?

22 A YES.

23 Q IN TERMS OF YOUR EXPERIENCE AS A HYPNOTIST,
24 HYPNOTHERAPIST, THE 28 YEARS YOU HAVE TOLD US, BY PUTTING A
25 PERSON IN A TRANCE STATE EITHER BY SHOCK INDUCTION OR ANY
26 OTHER HYPNOTIC TECHNIQUE, CAN YOU PUT THE INDIVIDUAL UNDER
27 YOUR CONTROL AND HAVE THEM AUTOMATICALLY DO WHAT YOU TELL
28 THEM TO DO?

1 A AS I INDICATED BEFORE, THERE IS ALWAYS A
2 POSSIBILITY IF THE INDIVIDUAL WANTS TO, BUT HYPNOSIS IS NOT
3 NECESSARY TO GET PEOPLE TO DO THINGS THAT YOU WANT THEM TO
4 DO.

5 IN OTHER WORDS, HYPNOTIC STATE IS NOT
6 NECESSARILY THE FALL GUY IN THIS REGARD. PUTTING PEOPLE IN
7 A TRANCE STATE DOES NOT MEAN THAT THEY WILL AUTOMATICALLY DO
8 WHAT YOU WANT THEM TO DO.

9 AGAIN, LET ME REPEAT IN TERMS OF A QUOTE FROM
10 THE TEXT WHERE THE AUTHOR GOES OVER ALL THE EVIDENCE:
11 (READING.)

12 " SINCE THE AUTHOR KNOWS OF NO
13 REPEATED INSTANCE IN THE LABORATORY OR IN
14 OCCASIONAL REAL LIFE REPORTS WHERE SUCH
15 BEHAVIOR ALSO" --

16 THE COURT: BEFORE YOU DO THAT, LET ME ASK YOU WHERE
17 IS THIS FROM?

18 THE WITNESS: THIS IS FROM THIS PARTICULAR BOOK RIGHT
19 HERE.

20 THE COURT: IT WOULD BE WELL IF YOU STATED FOR US
21 WHERE IT IS FROM.

22 Q BY MR. KLEIN: PERHAPS STATE THE NAME OF THE
23 BOOK AND --

24 A SURE. THIS IS CALLED "HANDBOOK OF HYPNOSIS FOR
25 PROFESSIONALS" BY ROY UDOLF, WHO HAS A J.D. DEGREE AS WELL
26 AS A PH.D. DEGREE.

27 Q IS THAT CONSIDERED AN AUTHORITATIVE?

28 A OH, YES. IT IS ONE OF THE TEXT THAT I UTILIZE

1 IN MY TEACHING AND --

2 THE COURT: WHAT PAGE?

3 THE WITNESS: PAGE 284, THIRD PARAGRAPH. (READING.)

4 "SINCE THE AUTHOR KNOWS OF NO
5 REPEATED INSTANCE IN THE LABORATORY OR IN
6 OCCASIONAL REAL LIFE REPORTS WHERE SUCH
7 BEHAVIOR," AND HE IS REFERRING TO NOW
8 ANTISOCIAL OR SELF-DESTRUCTIVE, "HAS CLEARLY
9 BEEN PRODUCED IN THE ABSENCE OF OTHER
10 FACTORS, AND SINCE IN STUDIES WHERE THESE
11 FACTORS SEEM MINIMIZED, COMPLIANCE RATES
12 TEND TO BE LOW," HE WOULD VOTE WITH THOSE
13 WHO DOUBT THAT HYPNOSIS PER SE IS LIKELY
14 EITHER TO DECEIVE OR COMPEL THE SUBJECT INTO
15 COMMITTING BEHAVIOR THAT IS CONSIDERED WRONG
16 TO THEM.

17 AND THEN HE QUOTES DR. MARTIN ORNE, A VERY
18 RESPECTED PSYCHIATRIST FROM UNIVERSITY OF PENNSYLVANIA ON
19 PAGE 284. (READING.)

20 "IT," HYPNOSIS, "HAS NOT BEEN
21 DEMONSTRATED TO DEPRIVE A SUBJECT OF HIS
22 WILL OR FREEDOM OF CHOICE, NOR DOES IT TURN
23 HIM INTO A MERE ROBOT."

24 SO I THINK THE EVIDENCE, AT LEAST RESEARCH
25 EVIDENCE AND REPORTS, AND THIS IS IN JUST ABOUT EVERY
26 TEXTBOOK. THAT I FEEL IS REPUTABLE WOULD AGREE.

27 Q BY MR. KLEIN: I TAKE IT YOU WOULD AGREE WITH
28 THE POINT OF VIEW?

1 A YES, I DO.

2 MR. KLEIN: THANK YOU.

3 I HAVE NO FURTHER QUESTIONS.

4

5

CROSS-EXAMINATION +

6

BY MR. LEVY:

7

Q EXCUSE ME. DO YOU MIND IF WE BORROW THIS FOR
8 RIGHT NOW?

9

A NO, I DON'T.

10

Q WE WILL RETURN IT.

11

A OKAY.

12

Q DR. KATZ, MR. KLEIN TALKED TO YOU ABOUT
13 ABSOLUTES VERSUS POSSIBILITIES. YOU READ TO US ABOUT NOT
14 TURNING SOMEONE INTO A ROBOT. LET ME ASK YOU THIS QUESTION.

15

IS THERE SUCH A THING AS MASS HYPNOSIS OR MASS
16 SUGGESTIBILITY?

17

A UH-HUH.

18

THE COURT: DOES THAT MEAN "YES"?

19

THE WITNESS: YES, THERE IS.

20

Q BY MR. LEVY: IT IS NOT VERY DIFFICULT TO USE
21 THE TECHNIQUES OF MASS SUGGESTIBILITY, IS IT?

22

A I THINK THERE ARE SOME DIFFERENCES. I THINK
23 YOU HAVE TO HAVE CERTAIN VARIABLES THAT HAVE TO BE PRESENT
24 WHEN YOU DEAL WITH EITHER MASS HYPNOSIS OR MASS
25 SUGGESTIBILITY.

26

Q WHAT VARIABLES WOULD HAVE TO BE PRESENT?

27

A WELL, I THINK YOU WOULD HAVE TO HAVE, ONE, A
28 RELATIONSHIP WITH A PERSON WHO IS INDUCING THAT MASS, THERE

1 HAS TO BE SOME KIND OF ADULATION, THERE HAS TO BE SOME KIND
2 OF TRANSFERENCE IS THE TECHNICAL TERM THAT WE UTILIZE. IN
3 OTHER WORDS, THERE HAS TO BE SOME KIND OF INTERPERSONAL
4 CONNECTION WITH THAT INDIVIDUAL. PROBABLY SEEN AS AN
5 AUTHORITY FIGURE OR SOME SOURCE OF POWER OR INFLUENCE.

6 AND, TWO, THERE HAS TO BE SOME MOTIVATION,
7 LET'S SAY, TO SUBJUGATE ONE'S INDIVIDUAL EGO TO THE
8 PARTICULAR GROUP.

9 Q NOW, LET'S SAY WE HAD A CHURCH SETTING AND WE
10 HAD A VERY CHARISMATIC LEADER, ONE OF THOSE KIND OF PEOPLE
11 WHO SOMETIMES PEOPLE WOULD SAY, "WELL, THEIR SERMON TODAY
12 ALMOST MESMERIZED ME. HE OR SHE WAS SO FORCEFUL TODAY THAT
13 I LISTENED AND I WAS JUST RAPT," R-A-P-T, NOT RAPPED, HIT
14 OVER THE HEAD.

15 IS THAT OR COULD THAT BE PART OF THE ADULATION
16 THAT WOULD BE NECESSARY FOR MASS HYPNOSIS TO WORK?

17 A THAT COULD BE ONE OF THE VARIABLES INVOLVED,
18 YES.

19 Q NOW, WE TALKED ABOUT MOTIVATION OR YOU TALKED
20 ABOUT MOTIVATION AND SUBJUGATION.

21 IF YOU WERE PART OF A RELIGIOUS GROUP, OR LET'S
22 SAY YOU WERE AN INDIVIDUAL WHO WAS SEEKING SPIRITUAL
23 SALVATION AND WHO FELT THAT IN ORDER TO ACCOMPLISH THIS
24 GOAL, THEY WOULD HAVE TO BELONG, THEY WOULD HAVE TO FOLLOW,
25 THEY WOULD HAVE TO BE PART OF SOMETHING, WOULD THAT BE
26 SUFFICIENT MOTIVATION SO THAT MASS HYPNOSIS MIGHT WORK?

27 A NOT NECESSARILY. I THINK I'D HAVE TO KNOW
28 SOMEWHAT MORE ABOUT THE INDIVIDUAL. THAT COULD BE WHAT I

1 CALL A CONTRIBUTING FACTOR. I WOULD HAVE TO KNOW SOMETHING
2 ABOUT THE EGO STRENGTH OF THE INDIVIDUAL, I WOULD HAVE TO
3 KNOW SOMETHING ABOUT THE FAMILY CONTEXT.

4 IN OTHER WORDS, IS THIS AN INDIVIDUAL WHO IS
5 WITHOUT FAMILY SUPPORT OR THE USUAL SUPPORT SYSTEM AND
6 THEREFORE IS LOOKING FOR ANOTHER FAMILY SITUATION OR ANOTHER
7 CONTEXT IN WHICH TO GAIN THAT PARTICULAR SUPPORT.

8 I'D HAVE TO KNOW SOMETHING ABOUT WHETHER --
9 WHAT THE INDIVIDUAL'S CONCEPTION OF HIMSELF IS, NAMELY IS --
10 DOES HE WANT TO AND WILLING TO SUBJUGATE HIMSELF TO SOMEONE
11 WHO IS CHARISMATIC OR TO THE GROUP PRESSURES THAT ARE THERE.

12 Q WHAT IF THIS INDIVIDUAL -- HYPOTHETICALLY, OF
13 COURSE -- WHAT IF THIS INDIVIDUAL HAD SHOWED HIMSELF TO BE A
14 MEDITATIVE SORT, A RELIGIOUS SORT, A SEEKER AFTER SALVATION,
15 SO MUCH SO THAT HE HAD HIS OWN MEDITATION GROUP AND HE
16 ALLIED HIMSELF WITH PEOPLE WHO WERE SEEKING THAT KIND OF
17 SPIRITUAL UNDERSTANDING.

18 IF THAT WERE HIS BACKGROUND, AND HE FOUND AN
19 INDIVIDUAL WHO APPEARED TO HOLD THE KEY TO THE SPIRITUAL
20 SALVATION, AND THAT PERSON WHO APPEARED TO HOLD THE KEY TO
21 THIS INDIVIDUAL'S SPIRITUAL SALVATION WAS AN AUTHORITY
22 FIGURE, ONE WHO A GROUP HAD ADULATION FOR, WOULD THE
23 LIKELIHOOD THEN BE THAT A MASS HYPNOSIS TECHNIQUE MIGHT BE
24 EFFECTIVE?

25 A WELL, I THINK THE WAY I WOULD PUT IT, I WOULD
26 SAY SOMETHING TO THE EFFECT THAT THOSE PARTICULAR CONDITIONS
27 THAT YOU JUST DESCRIBED COULD -- GIVEN, LET'S SAY, A LOT OF
28 OTHER CIRCUMSTANCES THAT WOULD PROBABLY HAVE TO BE

1 CONSIDERED -- COULD LEAD, LET'S SAY, TO THE PERSON BEING
2 VERY MUCH INFLUENCED.

3 I WOULDN'T NECESSARILY REFER TO IT AS HYPNOSIS
4 AS SUCH, BUT AS SAYING THE POWER OF ANY INDIVIDUAL THROUGH
5 WORD OR ACTION TO INFLUENCE SOMEBODY ELSE, CERTAINLY SOMEONE
6 WHO IS IN A SITUATION LIKE THAT COULD PUT HIMSELF IN A
7 POSITION OF SUBJUGATING, LET'S SAY, HIS EGO OR HIMSELF TO
8 THAT PARTICULAR PERSON.

9 Q WOULD YOU GO AS FAR AS TO SAY AS THAT
10 INDIVIDUAL MIGHT BECOME VERY SUGGESTIBLE TO THE AUTHORITY
11 FIGURE?

12 A YES. AGAIN RECOGNIZING THEIR BEING VERY
13 SUGGESTIBLE DOES NOT NECESSARILY MEAN IN A HYPNOTIC STATE,
14 BUT I WOULD SAY YES, THERE IS A POSSIBILITY THAT A PERSON IN
15 THAT SITUATION -- I HAVE MANY CLIENTS WHO HAVE BEEN IN THAT
16 SITUATION WHO FOUND THEMSELVES VERY SUGGESTIBLE TO PEOPLE IN
17 THAT KIND OF AN AUTHORITY SITUATION, THAT KIND OF GROUP
18 SITUATION.

19 Q NOW, YOU TOLD US ABOUT WRONG CONDUCT VERSUS
20 CONTROL. IF SOMEONE WERE IN THAT HYPOTHETICAL GROUP
21 SITUATION AND THEY WERE SEEKING A SPIRITUAL CONNECTION, FOR
22 THEM TO GIVE OF THEMSELVES EXTENSIVELY, THAT WOULDN'T BE
23 WRONG CONDUCT UNDER THAT SCENARIO, WOULD IT?

24 A IF THE PERSON PARTICULARLY INTERPRETED THAT
25 BEING WRONG -- IN OTHER WORDS, IF THAT PERSON WAS VERY
26 DEPENDENT, VERY INDIVIDUALISTIC -- I KNOW A LOT OF MY
27 FRIENDS, ASSOCIATES, INCLUDING MYSELF, WHO WOULD CONSIDER IT
28 TO BE NOT WITHIN MY BEST INTEREST TO SUBJUGATE MYSELF.

1 AND IF I FELT THAT, I WOULD PROBABLY NOT GET
2 INVOLVED IN THAT BEHAVIOR. BUT IF I FELT THAT BEHAVIOR WAS
3 CONDUCIVE TO MYSELF, MY WELL-BEING, MY DEVELOPMENT, I MIGHT
4 CONSIDER IT EXACTLY THE RIGHT THING TO DO.

5 Q IF I UNDERSTAND WHAT YOU ARE SAYING IS THAT
6 PERSON WHO SOUGHT SPIRITUAL SALVATION FOLLOWED -- MAYBE
7 DICTATES IS TOO STRONG A WORD -- LET'S SAY FOLLOWED THE
8 SUGGESTIONS OR, IN QUOTES, FOLLOWED THE CONTROL, THE
9 DIRECTION OF THE AUTHORITY FIGURE, AND THE AUTHORITY FIGURE
10 APPEARED TO BE DIRECTING THAT INDIVIDUAL ON THIS PATH
11 TOWARDS SPIRITUAL SALVATION, THAT PERSON THEN WOULD BE GOING
12 ALONG WITH CERTAINLY WHAT WAS PROPER FROM THEIR PERSPECTIVE,
13 WOULD THEY NOT?

14 A CORRECT.

15 Q YOU MADE REFERENCE TO ONE OF THE TEXT THAT YOU
16 CONSIDERED AND TWO OF THE PEOPLE WHO WERE YOUR INSTRUCTORS.
17 WAS THAT DAVID B. CHEEK, M.D.?

18 A CORRECT.

19 Q AND ALSO LESLIE LE CRON?

20 A CORRECT.

21 Q DOCTOR, I'D LIKE TO READ TO YOU FROM THEIR
22 TEXT. IT IS ON PAGE SEVEN OF THEIR TEXT. IT SAYS:
23 (READING.)

24 "MAN Y PEOPLE EXPECT TO BE UNDER
25 THE CONTROL OF THE HYPNOTIST IN HIS POWER.
26 THEY THINK ANY SUGGESTION GIVEN MUST THEN BE
27 CARRIED OUT. IN FACT THERE IS NO SURRENDER
28 OF WILL POWER. ANY SUGGESTION GIVEN IS

1 STRICTLY CENSORED BOTH CONSCIOUSLY AND
2 SUBCONSCIOUSLY."

3 WOULD YOU AGREE WITH THAT SO FAR?

4 A UH-HUH.

5 Q IN GENERAL --

6 THE COURT: IT WOULD BE HELPFUL IF INSTEAD OF --

7 THE WITNESS: YES, OKAY.

8 THE COURT: BECAUSE THIS LADY IS MAKING A RECORD AND
9 IT IS HARD TO --

10 THE WITNESS: OKAY. THANK YOU.

11 THE COURT: -- TO TAKE YOUR ANSWERS THAT WAY. THANK
12 YOU.

13 Q BY MR. LEVY: IT CONTINUES.

14 A OKAY.

15 Q (READING.)

16 "IN GENERAL, IT MAY BE SAID
17 THAT NO ONE WILL DO ANYTHING UNDER HYPNOSIS
18 THAT IS AGAINST HIS MORAL CODE OR THAT HE
19 MAY NOT WANT TO DO."

20 WOULD YOU AGREE WITH THAT?

21 A CORRECT.

22 Q (READING.)

23 "THIS MATTER WILL BE CONSIDERED
24 AT MORE LENGTH IN A LATER CHAPTER. IT
25 APPLIES TO HYPNOSIS AS ORDINARILY USED, BUT
26 NOT TO BRAINWASHING OR DICTATOR PERSUASION
27 LONG CONTINUED."

28 WOULD YOU FURTHER AGREE WITH THAT?

1 A CORRECT.

2 Q NOW, THE TESTIMONY THAT MR. KLEIN WAS KIND
3 ENOUGH TO READ TO YOU HAPPENED TO BE FROM MY WIFE, WHO IS
4 THE M.F.C.C. AND ALSO PERSON WHO IS LICENSED BY THE STATE OF
5 CALIFORNIA TO USE HYPNOSIS IN HER PRACTICE. WHAT SHE WAS
6 DESCRIBING IN THE PARAGRAPH PRECEDING WHAT MR. KLEIN READ
7 WAS A SHOCK INDUCTION. LET ME READ TO YOU FROM YOUR SOURCE
8 BOOK WITH REGARD TO SHOCK INDUCTIONS.

9 BUT BEFORE I DO THAT, WOULD YOU SUGGEST OR
10 WOULD YOU AGREE THAT IN STAGE HYPNOSIS, THERE IS SOMEWHAT OF
11 A SHOCK INDUCTION THAT TAKES PLACE IN THE SENSE THAT A
12 PERSON IN FRONT OF A LARGE GROUP OF PEOPLE IS EITHER
13 EMBARRASSED, MAYBE MADE UNCOMFORTABLE, MAYBE MADE SLIGHTLY
14 FRIGHTENED IN ORDER TO BECOME A PARTICIPANT BEFORE A LARGE
15 GROUP OF PEOPLE?

16 A I WOULDN'T REFER TO THAT -- THAT WOULD BE AN
17 INCORRECT USE OF THE WORD SHOCK INDUCTION. SHOCK INDUCTION
18 REALLY IS A RAPID INDUCTION PROCEDURE WHICH THE INDIVIDUAL
19 IS VERY QUICKLY DISASSOCIATED FROM THE CONSCIOUS PART OF
20 THEMSELVES BY SOME KIND OF RAPID PROCESS.

21 NOW, WHEN YOU ARE DEALING WITH STAGE HYPNOTIST,
22 YOU ARE DEALING, YES, WITH A SOCIAL PSYCHOLOGICAL ASPECTS
23 THAT ARE INVOLVED THAT GO BEYOND, LET'S SAY, WHAT WE
24 CONSIDER INDUCTION PROCEDURES.

25 IN FACT, ONE OF THE TEXT I UTILIZE, ONE OF MY
26 FORMER STUDENTS, MICHAEL YAPKO, REFERRED TO AS TRANCE WORK
27 MAKES A DEFINITE DISTINCTION BETWEEN STAGE HYPNOSIS AND
28 HYPNOSIS AS PRACTICED BY, SAY, A HYPNOTHERAPIST OR IN THE

1 USUAL WAY BECAUSE YOU ARE DEALING WITH MORE THAN JUST THE
2 HYPNOTIC PROCEDURE AS SUCH.

3 YOU ARE DEALING WITH RIGHT GROUP INFLUENCE, YOU
4 ARE DEALING WITH THE WHOLE QUESTION OF PERFORMING,
5 EXPECTATIONS OF PERFORMING BEFORE A GROUP AND THE
6 EMBARRASSMENT OF NOT FULFILLING THE EXPECTATIONS OF THAT
7 GROUP, WHICH BRINGS IN ANOTHER VARIABLE INTO THE SITUATION.

8 Q LET ME READ TO YOU FROM DR. CHEEK AND LESLIE
9 LECRON.

10 A SURE.

11 Q (READING.)

12 "MOST STAGE TECHNIQUES ARE
13 BASED ON THE STARTLE EFFECT. THE SUBJECT
14 LITERALLY IS FRIGHTENED SO THAT HE ENTERS
15 HYPNOSIS."

16 SINCE YOU HELD OUT DR. CHEEK AND DR. LE CRON,
17 WOULD YOU AGREE WITH THAT STATEMENT?

18 A ACTUALLY, I RESPECT, OKAY, DR. LE CRON AND
19 DOCTOR -- THAT BOOK, BY THE WAY, WAS WRITTEN QUITE AWHILE
20 AGO. WHETHER HE WOULD AGREE WITH SOME -- I HAPPEN TO KNOW
21 DR. CHEEK PERSONALLY. AND IF YOU LOOK AT THE COPYRIGHT DATE
22 OF THAT, IT IS AN OLD TEXT, IN MANY WAYS OBSOLETE TEXT,
23 ALTHOUGH A VALUABLE ONE.

24 I HAVE USED IT 10, 15 YEARS AGO AS PART OF MY
25 TEACHING. I NO LONGER USE IT BECAUSE IT IS OBSOLETE. I
26 FRANKLY WOULD NOT AGREE THAT ALL STAGE HYPNOSIS IS A RESULT
27 OF STARTLE EFFECT.

28 I HAVE HAD MY STUDENTS -- I GO TO MICHAEL DEAN,

1 WHO IS A STAGE HYPNOTIST, AND I HAVE GONE TO HIS SHOW OVER
2 12 TIMES. AND I HAVE HAD STUDENTS WHO HAVE GONE UP THERE
3 AND PARTICIPATED IN THE PROGRAM AS WELL AS I KNOW SOME
4 PEOPLE PERSONALLY WHO HAVE.

5 AND THEY WILL GO INTO A TRANCE STATE MAINLY
6 BECAUSE NOT SO MUCH THEY ARE STARTLED INTO IT AS MUCH AS
7 THEY ARE COOPERATIVE. THEY WANT TO. IT GIVES THEM A CHANCE
8 TO BE EXHIBITIONIST OR SHOW OFF THAT. I DO THINK THAT SOME
9 STAGE HYPNOTIST AND AGAIN WE HAVE TO -- I DON'T THINK PAT
10 COLLINS DOES THAT, USE STARTLE PROCESSES.

11 Q I APPRECIATE ALL THIS INFORMATION. AS THAT WAS
12 YOUR ORIGINAL TEXT THAT --

13 A THAT IS NOT MY ORIGINAL TEXT. THAT IS A TEXT I
14 HAVE USED. THE TEXT I WAS REFERRING TO WAS QUITE A
15 DIFFERENT ONE.

16 Q WE HAVE IT HERE?

17 A RIGHT.

18 Q LIKE MAYBE SINCE YOU MENTIONED YOU HAVE A
19 FAVORITE, THIS WAS MY TEXT WHEN I WENT TO U.S.C. MEDICAL
20 SCHOOL AND STUDIED HYPNOSIS THERE. I SHOULD TELL YOU THAT
21 DR. WEITZENHOFFER, WHO WAS THE STANDARD TEXT, IS FROM
22 STANFORD UNIVERSITY?

23 A I AM FAMILIAR WITH DR. WEITZENHOFFER.

24 Q HE AGREES WITH DR. LE CRON AND ALSO WITH DR.
25 CHEEK WITH REGARD TO THE FRIGHTENING EFFECT.

26 ARE YOU FAMILIAR WITH WILLIAM KROEGER?

27 A YES, I AM.

28 Q WOULD YOU SAY HE IS ALSO ONE OF THE RENOWNED

1 EXPERTS IN THE FIELD OF HYPNOSIS?

2 A DEFINITELY.

3 Q WOULD YOU AGREE WITH HIS CONCLUSIONS WITH
4 REGARD TO MASS HYPNOSIS?

5 A I MIGHT OR I MIGHT NOT. I'D HAVE TO LISTEN TO
6 IT.

7 Q LET ME JUST POINT OUT TO YOU SOME OF BRIEFLY
8 WHAT HE HAS TO SAY. ON PAGE 95 OF HIS TEXT: (READING.)

9 "MASS SUGGESTION OR MASS
10 HYPNOSIS IS RELATIVELY EASY TO ESTABLISH IN
11 A GROUP. THE REASONS FOR THIS ARE, ONE,
12 THERE IS AN EMOTIONAL CONTAGION THAT TAKES
13 PLACE WITH OTHER MEMBERS OF THE GROUP; TWO,
14 PERSONS IDENTIFY WITH WHAT THEY SEE; THREE,
15 THE INHERENT COMPETITIVENESS IS MOBILIZED;
16 AND, FOUR, THERE IS USUALLY AN INTENSE
17 DESIRE TO PLEASE THE LEADER, FATHER OR
18 MOTHER FIGURE OF THE GROUP."

19 WOULD YOU AGREE WITH DR. KROEGER?

20 A I WOULD AGREE THAT IT IS SOMETHING THAT CAN BE
21 INDUCED IF ALL THOSE FACTORS ARE THERE. WHETHER IT IS AS
22 EASILY INDUCED AS HE INDICATES, I HAVE SOME QUESTION ABOUT,
23 BUT BASICALLY I WOULD AGREE WITH THAT STATEMENT.

24 Q NOW, YOU DO AGREE THAT THERE IS SUCH A THING AS
25 A SHOCK INDUCTION?

26 A CORRECT.

27 Q AND YOU DO AGREE THAT THE STARTLE EFFECT OR THE
28 FRIGHTENING EFFECT GIVES TO THE PERSON WHO IS UTILIZING THE

1 TECHNIQUE AT LEAST A MODICUM OF CONTROL OVER THE INDIVIDUAL
2 WHO IS BEING SHOCKED INTO HYPNOSIS?

3 A I WOULDN'T -- FIRST OF ALL, I WOULD NOT AGREE
4 THAT THE STARTLE EFFECT IS NECESSARILY EQUATED WITH A
5 FEARFUL EFFECT. MANY TIMES PEOPLE ARE STARTLED AND THEY
6 DON'T GET INTO AN EMOTIONAL STATE SO QUICK THAT YOU BYPASS
7 THEIR EMOTIONS. A STARTLE EFFECT CAN RESULT IN A CHILDREN
8 GOING --

9 Q DIDN'T BOTHER YOU AT ALL, DID IT, DOCTOR?
10 THERE IS NO SUCH THING AS A STARTLE EFFECT AND
11 IT HAS NO EFFECT ON THE INDIVIDUAL? I AM WONDERING WHY YOUR
12 FACE --

13 A WAIT A MINUTE. I DIDN'T SAY IT DIDN'T HAVE AN
14 EFFECT. I WASN'T RENDERED FEARLESS OR FEARFUL AND I
15 CERTAINLY DON'T FEEL THAT I AM UNDER YOUR CONTROL.

16 Q WELL, I DIDN'T SUGGEST THAT YOU WERE. I DIDN'T
17 SUGGEST THAT YOU WERE, DOCTOR, AND I AM LOOKING AT YOU NOW
18 AND I SEE ALL THE RED AROUND YOUR FACE. WHAT I AM
19 SUGGESTING IS THIS: IF YOUR SEMANTIC INTERPRETATION OF
20 STARTLE VERSUS FRIGHTENED IS EXACTLY THAT, A SEMANTIC
21 ARGUMENT.

22 WOULD YOU AGREE THAT IF SOMEONE IS STARTLED, AT
23 LEAST TO SOME DEGREE, THEY ARE FRIGHTENED? THERE IS A FEAR
24 ELEMENT BUILT INTO THE WORD "STARTLING," IS THERE NOT?

25 A I DON'T WANT TO GET -- I WOULD SAY IN THE
26 STARTLE EFFECT, OKAY, THAT I AM IN A STATE WHERE THERE IS AN
27 EMOTIONAL REACTION. WHETHER I WOULD DEFINE IT AS FEAR, I AM
28 NOT NECESSARILY SO.

1 Q I THINK THAT HURT ME WORSE THAN YOU. MY HANDS
2 ARE ALL RED.

3 A I DIDN'T FEEL ANY FEAR WHEN YOU DID THAT. I
4 FELT STARTLED.

5 Q I FELT FEAR. I DIDN'T KNOW IF THE JUDGE WOULD
6 LOOK AT ME KIND OF ASIDE OR NOT.

7 THE COURT: I AM STILL THINKING IT OVER.

8 Q BY MR. LEVY: DOCTOR, LET ME ASK YOU THIS. IN
9 THE COURSE OF AN INDUCTION, IN THE NORMAL SETTING, WHAT
10 WOULD YOU SAY -- YOU TELL ME WHAT YOU WOULD DO WITH REGARD
11 TO THE NORMAL INDUCTION. DO YOU HAVE A PREHYPNOTIC
12 CONFERENCE WITH AN INDIVIDUAL THAT YOU ARE GOING TO PUT IN
13 HYPNOSIS?

14 A YES, SIR, I USUALLY DO. MANY PEOPLE USUALLY
15 HAVE MISCONCEPTIONS ABOUT HYPNOSIS, A LOT OF FEARS ABOUT IT,
16 A LOT OF CONCERNS ABOUT LOSING CONTROL AND I USUALLY HAVE A
17 PREINDUCTION DISCUSSION WITH AN INDIVIDUAL TO INDICATE THAT
18 THEY ARE NOT GOING TO LOSE CONTROL, THAT THEY ARE GOING TO
19 BE ABLE TO BE IN A STATE WHEREBY THEY ARE IN CONTROL.

20 Q WHEN YOU UTILIZE THE HYPNOTIC TECHNIQUE TO PUT
21 SOMEONE IN HYPNOSIS, DO YOU GENERALLY MAKE THEM COMFORTABLE
22 IN A CHAIR?

23 A CORRECT.

24 Q DO YOU GENERALLY TELL THEM TO PUT THEIR FEET ON
25 THE FLOOR AND UNCROSS THEIR LEGS AND THEIR ARMS?

26 A CORRECT.

27 Q DO YOU SOMETIMES USE AN EYE FASCINATION
28 TECHNIQUE?

1 A SOMETIMES I DO.

2 Q DO YOU TELL THEM TO BREATHE DEEPLY AND
3 REGULARLY?

4 A AS A RULE.

5 Q LET ME READ TO YOU FROM A BOOK THAT IS WRITTEN
6 BY ELIZABETH PROPHET, THE LEADER OF CHURCH UNIVERSAL AND
7 TRIUMPHANT. BUT FIRST THE NAME OF THE BOOK IS "THE SCIENCE
8 OF THE SPOKEN WORD" BY MARK AND ELIZABETH PROPHET.

9 FROM WHERE YOU ARE SITTING, CAN YOU SEE THIS
10 DIAGRAM?

11 A YES, I CAN.

12 Q WOULD THIS POSSIBLY SATISFY THE USE FOR AN EYE
13 FASCINATION OBJECT?

14 A IT COULD.

15 Q (READING.)

16 "NOW, BEFORE ACTUALLY SPEAKING
17 THE WORDS OF THE DECREE, SIT IN A
18 COMFORTABLE STRAIGHT CHAIR, VISUALIZE THE
19 VISUALIZATION OBJECT, HOLD YOUR SPINE AND
20 YOUR HEAD ERECT, YOUR LEGS AND HANDS
21 UNCROSSED AND YOUR FEET FLAT ON THE FLOOR.
22 HOLD THE BOOK AT EYE LEVEL," THAT WOULD PUT
23 IT OUT HERE, "SO YOU WOULD HAVE ANOTHER
24 MESSAGE UNIT TECHNIQUE, THE WEIGHT OF THE
25 ARM HOLDING THE BOOK, AND THEN BREATHE
26 DEEPLY AND REGULARLY."

27 ARE THOSE STANDARD PROCEDURES WHEN YOU ARE
28 DOING AN INDUCTION?

1 A YEAH, THOSE ARE PROCEDURES THAT COULD BE
2 UTILIZED FOR INDUCTION, YES.

3 MR. LEVY: AT THIS TIME, YOUR HONOR, WE WOULD LIKE TO
4 MARK THIS BOOK, WHICH IS THE WORK OF MARK AND ELIZABETH
5 PROPHET, FOR IDENTIFICATION AND OFFER THAT INTO EVIDENCE AT
6 THE SAME TIME, YOUR HONOR.

7 THE COURT: DID YOU GIVE IT A NUMBER?

8 MR. LEVY: SINCE I WASN'T SURE WHAT THE NUMBER WAS, I
9 WAS LOATHE TO GUESS.

10 THE COURT: 120.

11 MR. LEVY: 120. THANK YOU, YOUR HONOR.

12 THE COURT: IT'S RECEIVED.

13 (MARKED AND REC'D IN EVID: ^ EXHIBIT 120, BOOK)

14 MR. LEVY: THANK YOU, YOUR HONOR.

15 Q THERE ARE -- IN MOST OF THE TEXT THAT I HAVE
16 LOOKED THROUGH, THERE IS A THING CALLED DEEPENING
17 TECHNIQUES. WOULD YOU EXPLAIN TO US WHAT "DEEPENING
18 TECHNIQUES" ARE?

19 A A DEEPENING PROCESS IN ONE IN WHICH YOU ASSIST
20 THE INDIVIDUAL MOVING FROM ONE LEVEL OF TRANCE TO A DEEPER
21 LEVEL. CONSEQUENTLY, THE INDIVIDUAL'S ABLE TO FURTHER
22 DISASSOCIATE HIS CORTICAL ACTIVITIES FROM THE SUBCORTICAL OR
23 HIS CONSCIOUS MIND FROM HIS SUBCONSCIOUS MIND.

24 Q WOULD IT BE FAIR TO STATE THAT IF A PERSON WAS
25 EXPOSED TO REPETITIONS OF THE INDUCTION TECHNIQUE AND THE
26 MASS HYPNOSIS SUGGESTIONS, THAT OVER A PERIOD OF TIME HE OR
27 SHE WOULD BECOME MORE SUGGESTIBLE TO THEM?

28 A WELL, WE DO UTILIZE REPETITION AS A PROCESS.

1 AND IT IS POSSIBLE USING A REPETITION PROCESS THAT WE COULD
2 BE, IN THE CONTEXT OF INDUCTION, THAT THE PERSON COULD MOVE
3 TO A MORE DEEPER HYPNOTIC STATE. THAT IS THE BEST WAY I CAN
4 PUT IT.

5 Q NOW, IN HETEROHYPNOSIS, AS OPPOSED TO
6 SELF-HYPNOSIS, IF I UNDERSTAND CORRECTLY, HETEROHYPNOSIS IS
7 WHERE ONE PERSON WHO IS THE DOCTOR, OR THE
8 MARRIAGE/FAMILY/CHILD COUNSELOR OR THE ANCILLARY THERAPIST
9 IS ACTUALLY DIRECTING THE OTHER PERSON INTO GOING INTO A
10 HYPNOTIC STATE?

11 A CORRECT.

12 Q WOULD I BE CORRECT IN ASSUMING THAT THE PERSON
13 IN CONTROL GENERALLY HAS THE OPPORTUNITY TO DIRECT WHERE THE
14 SUBJECT GOES?

15 A HAS THE OPPORTUNITY, YES.

16 Q OKAY. I'D LIKE TO READ -- YOU TOLD US, AND AS
17 A MATTER OF FACT YOU POINTED OUT A PARTICULAR PLACE IN THIS
18 VOLUME, PLACES ON PAGE 15, AND IT IS THE HANDBOOK OF
19 HYPNOSIS BY ROY UDOLF?

20 A RIGHT.

21 Q WHAT YOU READ TO US WAS ABOUT A MISCONCEPTION.
22 YOU READ THAT: (READING.)

23 ". . . WEIGHT OF THE EVIDENCE
24 SEEMS TO SUPPORT THE NOTION THAT IF A
25 SUBJECT IS DIRECTLY REQUESTED TO DO
26 SOMETHING THAT IS OBJECTIONABLE TO HIM, HE
27 WILL SIMPLY REFUSE TO DO IT OR IN SOME CASES
28 AWAKEN FROM THE TRANCE."

1 A CORRECT.

2 Q LET ME READ THE NEXT LINE FOR YOU, DOCTOR.

3 (READING.)

4 "ON THE OTHER HAND, IT MAY BE
5 POSSIBLE TO GET A SUBJECT TO PERFORM AN ACT
6 HE WOULD NOT NORMALLY DO BY DECEIVING HIM
7 INTO BELIEVING A SITUATION WAS DIFFERENT
8 THAN IT ACTUALLY IS. FOR EXAMPLE, THE
9 PERSON THAT HE IS BEING ASKED TO ATTACK IS
10 SAID TO BE ABOUT TO HARM HIM."

11 DOCTOR --

12 A YES.

13 Q -- IF A PERSON WERE DECEIVED OVER A LONG PERIOD
14 OF TIME, IS IT POSSIBLE THAT THAT INDIVIDUAL MIGHT DO THINGS
15 TO HIS OWN DETRIMENT?

16 A IT'S POSSIBLE.

17 MR. LEVY: THANK YOU, DOCTOR.

18 NOTHING FURTHER.

19 MR. KLEIN: MAY I JUST HAVE ONE MOMENT PLEASE, YOUR
20 HONOR?

21 THE COURT: ALL RIGHT.

22

23 REDIRECT EXAMINATION +

24 BY MR. KLEIN:

25 Q DOCTOR, YOU WERE ASKED SOME QUESTIONS ABOUT
26 SITTING IN A COMFORTABLE CHAIR AND HAVING YOUR FEET NOT
27 CROSSED AND THINGS LIKE THAT. IS THAT ONLY A HYPNOTIC
28 TECHNIQUE OR IS THERE SOME OTHER REASON THAT -- LET ME

1 WITHDRAW THAT.

2 DO YOU KNOW WHY SITTING IN A COMFORTABLE CHAIR
3 AND KEEPING YOUR FEET CROSSED -- KEEPING YOUR FEET UNCROSSED
4 IS RECOMMENDED BEFORE YOU PUT SOMEBODY INTO HYPNOSIS?

5 A YES. IN OTHER WORDS, IF AN INDIVIDUAL IS
6 RESISTANT, WHETHER IT BE TO HYPNOSIS OR ANY KIND OF
7 COMMUNICATION FOR THAT MATTER, IF THE PERSON IS HOLDING
8 HIMSELF LIKE THIS WITH FEET CROSSED, IT IS WHAT WE CALL A
9 DEFENSIVE POSITION.

10 WHAT WE WANT TO DO, AND I SUGGEST TO MY
11 STUDENTS IN MY CLASS IF THEY WANT TO GET THE MAXIMUM EFFECTS
12 OF MY LECTURES OR TEACHINGS, IT WOULD BE BEST TO THEM TO
13 REALLY BE IN A SITUATION WHERE THEY ARE BREATHING AT A
14 CERTAIN LEVEL, WHERE THEIR FEET IS UNCROSSED AND WHERE THEY
15 ARE ATTENTIVE TO WHAT IS GOING ON.

16 Q IS THAT A RELAXATION TECHNIQUE?

17 A YOU CAN USE IT AS RELAXING. YOU CAN USE IT IN
18 ANY WAY IN WHICH YOU WANT THE PERSON TO BE MORE RECEPTIVE TO
19 WHAT IS GOING ON.

20 Q WITH RESPECT TO THE BOOK THAT COUNSEL QUOTED
21 FROM, ANDRE WEITZENHOFFER, W-E-I-T-Z-E-N-H-O-F-F-E-R, I
22 NOTICE, AS YOU ALLUDED, THAT IT WAS PUBLISHED IN 1957.

23 OVER THE LAST 30 YEARS, HAVE THERE BEEN
24 CHANGES, UPDATES IN THE FIELD OF HYPNOSIS THAT MIGHT MAKE
25 SOME OF THE THINGS IN THIS BOOK OUT-OF-DATE?

26 A YEAH. I THINK THE LAST 30 YEARS HAVE BEEN A
27 TREMENDOUS AREA OF KNOWLEDGE AND RESEARCH AND EVIDENCE THAT
28 HAS MADE SOME OF THE OLD TEXTBOOKS SOMEWHAT OBSOLETE. AND

1 THAT IS ONE OF THE REASONS WE USE THEM -- DON'T USE THEM
2 EXCEPT FOR HISTORICAL VALUE.

3 Q YOU ALSO ANSWERED TO SOME OF COUNSEL'S
4 QUESTIONS -- HE WAS TALKING ABOUT A SITUATION WHERE YOU
5 COULD HAVE MASS HYPNOSIS AND HE TALKED ABOUT ADULATION AND
6 MOTIVATION, THE TWO FACTORS YOU SAID WOULD HAVE TO BE
7 PRESENT.

8 IN YOUR EXPERIENCE, ARE THERE MANY SITUATIONS
9 IN OUR SOCIETY, RELIGIOUS ORGANIZATIONS, WHATEVER, WHERE
10 THOSE TWO BASIC CRITERIA, ADULATION FOR THE LEADER AND
11 MOTIVATION TO WANT TO GET SOMETHING FROM THE SPEAKER, WHERE
12 THOSE ARE PRESENT?

13 A REPEAT THE QUESTION AGAIN.

14 Q MY QUESTION IS IS IT UNUSUAL IN OUR SOCIETY TO
15 HAVE SITUATIONS WHERE YOU HAVE A SPEAKER AND INDIVIDUAL IS
16 LISTENING WHO HAVE ADULATION AND MOTIVATION SUCH AS YOU --

17 A OH, YES. I THINK WE LIVE IN A SOCIETY OF MANY
18 WAYS WHERE THERE IS A TENDENCY TO ADULATE AND TO EMPOWER
19 PEOPLE IN POSITIONS OF AUTHORITY WITH CHARISMATIC ASPECTS.

20 MR. KLEIN: THANK YOU.

21 I HAVE NO FURTHER QUESTIONS.

22 MR. LEVY: YOU ARE GOING TO RETURN ALL THE BOOKS,
23 AREN'T YOU?

24 THE COURT: ANYTHING MORE?

25 MR. LEVY: JUST ONE OR TWO QUESTIONS.

26 ///

27 ///

28 ///

1 RECCROSS-EXAMINATION +

2 BY MR. LEVY:

3 Q IN DEFENSE OF MY OLD TEACHER HERE, THE BASIC
4 TECHNIQUES, THE BASIC INDUCTIONS, THE BASIC EYE
5 FASCINATIONS, ISN'T IT A FACT THAT SINCE THE TIME OF ANTON
6 MESMER, WHEN HYPNOTISM WAS FIRST GETTING ITS START, THAT
7 THERE ARE SOME TRUISMS THAT EVEN FROM THE 1700'S WITH
8 REGARDS TO HYPNOTISM ARE STILL ACCURATE AND EFFECTIVE TODAY?

9 A YES. LOT OF ANCIENT WISDOM IS STILL TRUE,
10 RIGHT.

11 MR. LEVY: THANK YOU, DOCTOR.

12 NOTHING FURTHER.

13 THE WITNESS: I HAVE A -- CAN I QUOTE ONE MORE
14 ASPECT?

15 THE COURT: ONLY IF THERE IS A QUESTION THAT CALLS
16 FOR IT.

17 MR. LEVY: WE WILL SEE ABOUT COMING TO YOUR LECTURE
18 MAYBE.

19 THE WITNESS: OKAY.

20 THE COURT: ANYTHING ELSE?

21 MR. KLEIN: JUST ONE QUESTION.

22 FURTHER REDIRECT EXAMINATION +

23 BY MR. KLEIN:

24 Q IS THERE SOME QUOTE THAT YOU HAVE, DOCTOR, THAT
25 RELATES TO THE QUESTIONS THAT WE HAVE BEEN ASKING YOU WITH
26 RESPECT TO HYPNOTISM AND ITS EFFECT UPON PEOPLE?
27

28 A YEAH. I JUST WANT TO MAKE ONE MORE QUOTE

1 REFERENCE TO THE BOOK REFERRED TO BY ROY UDOLF. AND AGAIN
2 ON PAGE 288, HE CONSIDERS: (READING.)

3 "ALL SUBJECTS RETAIN A CERTAIN
4 AMOUNT OF OBSERVING EGO AND IS DIFFICULT, IF
5 NOT IMPOSSIBLE, TO TOTALLY DECEIVE A SUBJECT
6 AS TO THE EXISTENCE OF CIRCUMSTANCES WHICH
7 WOULD RENDER THE PROPOSED CRIMINAL ACTIONS
8 JUSTIFIABLE OR APPROPRIATE TO THEM."

9 SO I WOULD SAY THIS, JUST TO QUALIFY WHAT WAS
10 JUST SAID, IT IS POSSIBLE TO DECEIVE SOMEONE.

11 AND AT THE SAME TIME AS FAR AS THE HYPNOTIC
12 STATE IS CONCERNED, IT WOULD BE VERY DIFFICULT TO DECEIVE
13 SOMEONE WHILE IN A STATE OF HYPNOSIS IN REGARDS TO MAKING A
14 STATEMENT THAT THEY WOULD DO THAT WOULD RESULT IN EITHER
15 ANTISOCIAL BEHAVIOR OR REPUGNANT. AND I JUST WANT TO
16 CLARIFY THAT POINT.

17 MR. KLEIN: THANK YOU.

18 I HAVE NO FURTHER QUESTIONS.

19 MR. LEVY: JUST ONE MORE LITTLE --

20 MR. MIDDLETON: WAIT A MINUTE. YOU GOT THAT FROM
21 HERE?

22 THE WITNESS: YES. IT IS ON PAGE 288.

23
24 FURTHER RE-CROSS-EXAMINATION +
25 BY MR. LEVY:

26 Q DOCTOR, WHAT YOU ARE TALKING ABOUT IS THE
27 DIFFICULTY IN DECEIVING SOMEONE?

28 A CORRECT.

1 Q IF SOMEONE WERE ONE OF YOUR PATIENTS, AND YOU
2 HAD BEEN UTILIZING HYPNOSIS ON THEM AS AN ONGOING COURSE OF
3 THERAPY, JUST ONE OF THE MODALITIES THAT YOU MIGHT USE, SAY
4 FOR OVER A PERIOD OF THREE MONTHS, AND THEY HAD COME TO RELY
5 UPON YOU AS THE AUTHORITY FIGURE AND CERTAINLY THE ONE THAT
6 WOULD NEVER JEOPARDIZE THEM BECAUSE YOU WOULD ONLY POSE FOR
7 THEM POSITIVE ALTERNATIVES, IF ONE OF THE ALTERNATIVES THAT
8 YOU POSED WAS A COURSE OF CONDUCT THAT MIGHT BE BENEFICIAL
9 TO A THIRD PARTY, SAY LIKE A WIFE -- WE ALL KNOW
10 MARRIAGE/FAMILY COUNSELORS OFTTIMES SUGGEST IN MARITAL
11 RELATIONSHIPS THAT SOMEONE DO SOMETHING OR NOT DO SOMETHING
12 TO BENEFIT THE RELATIONSHIP -- IF YOU WERE TO RECOMMEND A
13 COURSE OF CONDUCT THAT MIGHT NOT BE TO THEIR INDIVIDUAL BEST
14 INTEREST BUT WOULD BE IN THE BEST INTEREST OF THE MARITAL
15 RELATIONSHIP, WOULD THE POSSIBILITY BE MORE SO THAN NOT THAT
16 THAT INDIVIDUAL WOULD TAKE YOUR ADVICE AND DO SOMETHING NOT
17 TOTALLY IN THEIR OWN BEST INTEREST?

18 MR. KLEIN: I AM GOING TO OBJECT. THAT IS COMPOUND
19 AND VAGUE AND AMBIGUOUS.

20 THE COURT: IT IS TOO LONG.

21 Q BY MR. LEVY: DID YOU UNDERSTAND?

22 A I THINK IT WOULD HELP ME IF YOU BROKE IT DOWN.

23 Q LET ME SEE IF I CAN BREAK IT DOWN.

24 CAN YOU THINK OF ANY CIRCUMSTANCE WHERE
25 SOMEBODY MIGHT DO SOMETHING THAT MIGHT NOT BE IN THEIR OWN
26 BEST INTEREST IF THEY WERE PRECONDITIONED FOR A THREE-MONTH
27 PERIOD?

28 A YEAH. I CAN THINK OF CIRCUMSTANCES -- I

1 WOULDNT BLAME IT, OF COURSE, ON HYPNOSIS NECESSARILY, BUT I
2 CAN THINK OF A SITUATION WHERE INDIVIDUALS MAY BE INFLUENCED
3 BY SOMEONE TO DO THINGS THAT WOULD NOT BE IN THEIR BEST
4 INTERESTS. YES, I THINK THAT IS POSSIBLE.

5 MR. LEVY: THANK YOU, DOCTOR.

6 I HAVE NOTHING FURTHER.

7 MR. KLEIN: NOTHING FURTHER.

8 THE COURT: ALL RIGHT. THANK YOU. YOU ARE EXCUSED.

9 THE WITNESS: ALL RIGHT.

10 THE COURT: WE WILL TAKE OUR RECESS NOW. WE WILL
11 TAKE OUR MORNING RECESS AT THIS TIME.

12 (RECESS.)

13 THE COURT: PLEASE PROCEED.

14 MR. KLEIN: YES, YOUR HONOR. WE WOULD CALL ELIZABETH
15 CLARE PROPHET, YOUR HONOR.

16
17 ELIZABETH CLARE PROPHET FRANCIS, +
18 A CROSS-DEFENDANT HEREIN, CALLED AS A WITNESS ON HER OWN
19 BEHALF, HAVING BEEN PREVIOUSLY SWORN, TESTIFIED AS FOLLOWS:

20 THE CLERK: MA'AM, YOU PREVIOUSLY HAVE BEEN SWORN AND
21 ARE STILL UNDER OATH. PLEASE STATE YOUR NAME AGAIN FOR THE
22 RECORD.

23 THE WITNESS: ELIZABETH CLARE PROPHET FRANCIS.

24 THE CLERK: THANK YOU.

25 THE COURT: GO AHEAD.

26 ///

27 ///

28 ///

DIRECT EXAMINATION +

1
2 BY MR. KLEIN:

3 Q MISS PROPHET, WE HAVE JUST HAD THIS BOOK
4 ENTITLED "THE SCIENCE OF THE SPOKEN WORD" ADMITTED INTO
5 EVIDENCE AS EXHIBIT NUMBER 120. MR. LEVY SHOWED A PICTURE
6 TO THE LAST WITNESS AND ASKED HIM SOME QUESTIONS ABOUT IT.
7 I AM GOING TO SHOW THAT PICTURE TO YOU.

8 IT SAYS "THE DIVINE SELF." IT IS OPPOSITE PAGE
9 17 OF THE BOOK. ARE YOU FAMILIAR WITH THAT PICTURE?

10 A YES, I AM.

11 Q WHAT DOES THAT PICTURE SIGNIFY?

12 A IT IS THE CHART OF YOUR DIVINE REALITY. THE
13 UPPER SPHERE SYMBOLIZES THE THE PRESENCE OF GOD, THE GOD
14 PRESENCE ON WHOM YOU MEDITATE WHEN YOU PRAY OR DECREE.

15 THE CENTRAL FIGURE REPRESENTS THE LORD CHRIST,
16 THE PRESENCE OF JESUS AS WELL AS THE HOLY CHRIST SELF. THE
17 LOWER FIGURE WHICH YOU SEE SURROUNDED BY VIOLET FLAME IS
18 YOURSELF HERE IN EMBODIMENT ON EARTH SURROUNDED BY THE
19 SACRED FIRE OF THE HOLY SPIRIT.

20 Q THERE IS ANOTHER PICTURE ON THE COVER. CAN YOU
21 SEE THAT FROM WHERE YOU ARE?

22 A YES.

23 Q WHAT DOES THAT SIGNIFY?

24 A WHAT THAT IS A DRAWING OF IS CHAKRA OR
25 SPIRITUAL CENTER. AS YOU CAN SEE, THE BOOK IS CALLED "THE
26 SCIENCE OF THE SPOKEN WORD." AND THAT CENTER SIGNIFIES THE
27 THROAT CENTER OR THE POWER OF SPEECH.

28 Q NOW, THE CHART, THE FIRST ONE THAT YOU WERE

1 TALKING ABOUT OPPOSITE PAGE 17, WHAT IS THE PURPOSE OF
2 PEOPLE LOOKING AT THIS PICTURE WHILE THEY DECREE?

3 A THE PURPOSE IS TO ADDRESS THE FATHER, THE SON
4 AND THE HOLY SPIRIT IN PRAYER SO THAT ONE WILL BE UNDER THE
5 RADIANCE OF THE LIGHT OF THE TRINITY AT ALL TIMES IN PRAYER
6 AND DECREES.

7 Q AND MR. LEVY READ SOME SUGGESTIONS AS TO WHAT
8 YOUR POSTURE SHOULD BE WHEN YOU ARE DECREERING, SITTING DOWN
9 AND HAVING YOUR FEET UNCROSSED.

10 WHAT IS THE PURPOSE OF TELLING PEOPLE TO USE
11 THAT POSTURE WHEN THEY DECREE?

12 A THAT POSTURE IS AN ALTERNATIVE TO THE EASTERN
13 FORM OF YOGA. FOR INSTANCE, THE LOTUS POSTURE THAT IS
14 COMMONLY USED IN MEDITATION WHERE THE SPINE IS ERECT, MOST
15 PEOPLE IN THE WEST ARE NOT ABLE TO DO THAT AND SO THEY SIT
16 IN A REGULAR CHAIR. AND THE POINT IS TO SEE THAT ONE IS IN
17 CONTROL OF ONESELF THROUGH CORRECT POSTURE.

18 AND THE NONCROSSING OF THE FEET IS FOR THE FLOW
19 OF THE LIGHT UNIMPEDED THROUGH THE BODY WHICH YOU ARE
20 INVOKING THROUGH YOUR DECREE FROM THE GOD PRESENCE.

21 Q HAVE YOU EVER HAD ANY TRAINING IN HYPNOSIS?

22 A NONE WHATSOEVER.

23 Q EVER HAD ANY TRAINING IN PSYCHOLOGY?

24 A NO.

25 Q DID THERE COME A TIME WHEN YOU LEARNED THAT
26 GREGORY MULL HAD BEEN A HOMOSEXUAL?

27 A YES, THERE DID.

28 Q WHEN WAS THAT?

1 A IN LATE 1974 I RECEIVED A PHONE CALL FROM A
2 STUDENT IN SAN FRANCISCO WHO SAID THEY WOULD LIKE TO BRING A
3 FRIEND DOWN TO A SERVICE.

4 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR, TO ANY
5 FURTHER COMMENT WITH REGARD TO THE CONVERSATION AS HEARSAY.

6 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

7 Q BY MR. KLEIN: DURING THE COURSE OF THAT
8 CONVERSATION, DID YOU LEARN THAT GREGORY MULL HAD BEEN A
9 HOMOSEXUAL?

10 MR. LEVY: I AM GOING TO OBJECT. HEARSAY.

11 THE COURT: SUSTAINED.

12 MR. KLEIN: YOUR HONOR, MAY I BE HEARD ON THAT?

13 THE COURT: NO. PROCEED.

14 MR. KLEIN: YOUR HONOR, I WOULD ASK TO MAKE A RECORD
15 ON THAT, YOUR HONOR. I THINK IT IS SOMETHING I HAVE ANOTHER
16 QUESTION ON AND I JUST ASK TO MAKE A RECORD.

17 THE COURT: THE RECORD IS MADE.

18 MR. KLEIN: I'D LIKE TO EXPLAIN WHAT MY POSITION IS
19 ON THAT RULING. IT WILL JUST TAKE A MOMENT.

20 THE COURT: DO YOU REALLY FEEL WE SHOULD TAKE TIME?

21 MR. KLEIN: JUST TAKE A MOMENT.

22 THE COURT: ALL RIGHT.

23 (THE FOLLOWING PROCEEDINGS WERE HELD

24 AT THE BENCH:)

25 MR. KLEIN: YOUR HONOR, I SIMPLY WANTED TO ESTABLISH
26 THAT THAT IS WHEN SHE FIRST LEARNED THAT HE WAS A
27 HOMOSEXUAL, NOT --

28 THE COURT: I SIMPLY WANT TO ESTABLISH THAT IT IS

1 HEARSAY .

2 MR. KLEIN: BUT IT IS NOT FOR THE TRUTH OF THE
3 MATTER, YOUR HONOR .

4 THE COURT: THEN WHAT IS THE RELEVANCE?

5 MR. KLEIN: THAT IS HOW SHE LEARNED IT, THAT IS HOW
6 SHE LEARNED THE FACT. IT HAS NOTHING TO DO WITH THE TRUTH
7 OF THE FACT.

8 MR. LEVY: ANYTHING SHE HEARD IN THAT CONVERSATION IS
9 HEARSAY AND, AS SUCH, IS NOT ADMISSIBLE.

10 THE COURT: IF IT IS NOT INTRODUCED AS EVIDENCE OF
11 THE TRUTH OF THE STATEMENT, THEN WHAT IS ITS RELEVANCY?

12 MR. KLEIN: THAT SHE KNEW FROM THAT POINT THAT HE WAS
13 HOMOSEXUAL AND IT IS NOT BEING PUT IN TO SAY WHETHER WHAT
14 THE PERSON SAID WAS TRUE OR NOT. SHE WAS TOLD THAT.
15 WHETHER IT WAS TRUE OR NOT --

16 THE COURT: IF IT IS NOT BEING INTRODUCED AS EVIDENCE
17 OF THE TRUTH OF THE STATEMENT, THEN HOW COULD SHE KNOW? AND
18 YOU USED THE WORD SHE KNEW.

19 MR. KLEIN: BECAUSE I AM NOT SAYING WHAT THE PERSON
20 SAID WAS TRUE.

21 THE COURT: PROCEED. WE ARE GOING TO PROCEED.

22 (THE PROCEEDINGS WERE RESUMED IN OPEN
23 COURT IN THE PRESENCE OF THE JURY:)

24 Q BY MR. KLEIN: DID THE CONVERSATION THAT YOU
25 JUST REFERRED TO OCCUR BEFORE OR AFTER YOU MET MR. MULL?

26 A BEFORE I MET HIM.

27 Q DID THAT CONVERSATION OCCUR BEFORE OR AFTER MR.
28 MULL WROTE HIS CLEARANCE LETTER?

1 A WELL BEFORE.

2 Q DO YOU RECALL WHAT MR. MULL WROTE IN HIS
3 CLEARANCE LETTER?

4 A NO.

5 Q HOW WAS IT THAT YOU DON'T RECALL THAT?

6 A BECAUSE I READ HUNDREDS AND THOUSANDS OF
7 LETTERS. AND MY PRACTICE IS WHEN I COMMIT THEIR CONTENT TO
8 PRAYER, THE PHYSICAL FIRE THAT BURNS THEM SYMBOLIZES THE
9 SACRED FIRE, AND I SURRENDER THE CONTENT TO THE SACRED FIRE
10 AND I ALSO ASK THAT I NOT RETAIN THE MEMORY.

11 Q DO YOU RECALL EVER HAVING A DISCUSSION WITH
12 ANYONE ELSE ABOUT MR. MULL BEING A HOMOSEXUAL PRIOR TO THE
13 TIME MR. MULL WROTE HIS CLEARANCE LETTER?

14 A WHAT DO YOU MEAN BY "ANYONE ELSE"?

15 Q DID YOU HAVE A CONVERSATION WITH ANYONE ABOUT
16 MR. MULL HAVING BEEN A HOMOSEXUAL BEFORE THE DATE MR. MULL
17 WROTE HIS CLEARANCE LETTER?

18 A YES, I HAD A CONVERSATION WITH SOMEONE ELSE.

19 Q WHO DID YOU HAVE IT WITH?

20 A MONROE SHEARER.

21 MR. LEVY: I AM GOING TO OBJECT.

22 THE COURT: JUST A SECOND.

23 MR. LEVY: I AM PREMATURE, YOUR HONOR. I WILL
24 WITHDRAW IT.

25 THE COURT: YES, YOU ARE.

26 WITH WHOM DID YOU HAVE THE CONVERSATION?

27 THE WITNESS: MONROE SHEARER.

28 Q BY MR. KLEIN: WHEN DID YOU HAVE IT?

1 A I HAD IT THE FIRST WEEK OF SUMMIT UNIVERSITY IN
2 1975, JANUARY.

3 Q WHEN MR. MULL WAS AT SUMMIT UNIVERSITY IN
4 JANUARY OF 1975, WAS HE ASSIGNED A ROOMMATE?

5 A YES, HE WAS.

6 Q DID MR. MULL GET ALONG WITH HIS ROOMMATE?

7 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THAT
8 DOES CALL FOR SPECULATION.

9 THE COURT: SUSTAINED.

10 Q BY MR. KLEIN: DO YOU HAVE ANY KNOWLEDGE AS TO
11 WHETHER MR. MULL GOT ALONG WITH HIS ROOMMATE?

12 MR. LEVY: I AM GOING TO OBJECT. CALLS FOR HEARSAY.

13 THE COURT: IT CALLS FOR A CONCLUSION, SPECULATION,
14 HEARSAY. MOVE ON. SUSTAINED.

15 Q BY MR. KLEIN: AS A RESULT OF YOUR CONVERSATION
16 WITH MR. SHEARER, DID YOU COUNSEL MR. MULL?

17 A YES, I DID.

18 Q AS A RESULT OF YOUR CONVERSATION WITH MR.
19 SHEARER, DID YOU COUNSEL MR. MULL'S ROOMMATE?

20 A YES, I COUNSELED BOTH OF THEM.

21 Q AND DID ALL THAT COUNSELING OCCUR PRIOR TO THE
22 TIME THAT MR. MULL WROTE HIS CLEARANCE LETTER?

23 A YES, IT DID.

24 Q HAVE YOU EVER REVEALED THE CONTENTS OF MR.
25 MULL'S CLEARANCE LETTER TO ANYONE?

26 A NO.

27 Q DID YOU EVER TELL ANYONE THAT MR. MULL WAS OR
28 HAD BEEN HOMOSEXUAL?

1 A NO.

2 Q AFTER MR. MULL WROTE HIS CLEARANCE LETTER, DID
3 ANYONE SPEAK TO YOU ABOUT THE FACT THAT MR. MULL HAD BEEN A
4 HOMOSEXUAL PRIOR TO THE FILING OF HIS LAWSUIT?

5 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. COUNSEL
6 IS LEADING HIS WITNESS.

7 THE COURT: SUSTAINED.

8 Q BY MR. KLEIN: DID YOU PRESSURE MR. MULL TO BE
9 A PERMANENT STAFF MEMBER?

10 A NO, I DIDN'T.

11 Q DID YOU EVER DISCUSS BEING A PERMANENT STAFF
12 MEMBER WITH MR. MULL?

13 A YES, I DID.

14 Q WHY DID YOU DISCUSS IT WITH HIM?

15 A I WAS UNDER THE ASSUMPTION THAT HE WANTED TO
16 BECOME A PERMANENT STAFF MEMBER.

17 Q WHAT DID YOU BASE THAT ASSUMPTION ON?

18 A ON HIS OWN DEVOTION AND COMMITMENT, HIS
19 STATEMENTS TO ME AND A WIFE -- A LETTER THAT HIS WIFE WROTE
20 TO ME STATING THAT HE DID WANT TO BECOME A PERMANENT STAFF
21 MEMBER.

22 Q AT THE CONVERSATION THAT YOU HAD WITH MR. MULL
23 BACK IN THE BEGINNING OF HIS QUARTER AT SUMMIT UNIVERSITY,
24 THE ONE WHERE YOU FIRST HAD A CONVERSATION WITH MONROE
25 SHEARER AND THEN YOU TALKED TO MR. MULL AND YOU TALKED TO
26 HIS ROOMMATE, TELL US WHAT THE CONVERSATION WAS BETWEEN
27 YOURSELF AND MR. MULL?

28 A IT WAS CONCERNING THE FACT THAT HE AND HIS

1 ROOMMATE WERE HAVING BITTER FIGHTS ON A DAILY BASIS. AND
2 THEY BOTH SOUGHT COUNSELING ON THE MATTER.

3 Q AND DID -- WAS THERE ANY DISCUSSION WITH HIM AS
4 TO WHAT THOSE FIGHTS WERE ABOUT?

5 MR. LEVY: OBJECTION, YOUR HONOR. VAGUE AS TO WHO
6 "HIM" IS.

7 Q BY MR. KLEIN: WAS THERE ANY DISCUSSION WITH
8 MR. MULL AS TO WHAT THE FIGHTS WERE ABOUT AND WHAT YOUR
9 OPINION OF WHY THEY WERE BEING CAUSED WAS?

10 MR. LEVY: OBJECTION, YOUR HONOR. THAT IS NOW A
11 COMPOUND QUESTION.

12 THE COURT: SUSTAINED.

13 Q BY MR. KLEIN: DID YOU TELL MR. MULL WHY YOU
14 BELIEVED THE FIGHTS WERE GOING ON BETWEEN HIM AND HIS
15 ROOMMATE DURING THAT CONVERSATION?

16 MR. LEVY: NOW I AM GOING TO HAVE TO OBJECT BECAUSE
17 HE IS LEADING HIS WITNESS AGAIN.

18 THE COURT: SHE CAN ANSWER YES OR NO.

19 THE WITNESS: WHAT WAS THE QUESTION?

20 Q BY MR. KLEIN: DID YOU TELL MR. MULL DURING THE
21 COURSE OF THAT COUNSELING SESSION WITH HIM WHY YOU BELIEVED
22 THE FIGHTS WERE GOING ON BETWEEN HIM AND THE ROOMMATE?

23 A YES.

24 Q WHAT DID YOU TELL HIM?

25 A I DISCOVERED THAT HIS ROOMMATE HAD BEEN
26 PREVIOUSLY A HOMOSEXUAL. THEIR FIGHTS WERE DOMESTIC IN
27 NATURE.

28 AND I EXPLAINED TO THEM THAT LOVE CASTS OUT ALL

1 FEAR AND ALL ARGUMENTATION, AND THAT THEY WERE HERE AT
2 SUMMIT UNIVERSITY TO MOVE FORWARD IN THE LIGHT OF GOD AND I
3 EXPECTED THEM TO CEASE THEIR ARGUMENTS AND BECOME DEVOTEES
4 OF CHRIST.

5 MR. KLEIN: THANK YOU.

6 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

7 THE COURT: ALL RIGHT.

8
9 CROSS-EXAMINATION +

10 BY MR. LEVY:

11 Q YOU TOLD US THAT WHEN SOMEONE WRITES A
12 CLEARANCE LETTER, AFTER YOU READ IT, YOU ASK SOMEONE TO
13 CLEAR YOUR MIND; IS THAT CORRECT?

14 A I PRAY TO THE HOLY SPIRIT FOR THE TAKING OF THE
15 CONTENT FROM ME AS IT IS BURNED.

16 Q AND JUST LIKE THAT, WHEN YOU ASK, EVERYTHING
17 THAT IS IN YOUR MIND IS JUST WIPED OUT?

18 A THAT IS MY BELIEF IN THE POWER OF THE HOLY
19 GHOST.

20 Q YOU HAVE NO TRAINING IN HYPNOSIS; IS THAT
21 CORRECT?

22 A NO, I DO NOT HAVE ANY, THAT IS CORRECT.

23 Q WHEN YOU GO TO YOUR DENTIST OR WHEN YOU WERE
24 GOING TO YOUR DENTIST, ISN'T IT A FACT THAT YOUR DENTIST
25 USED HYPNOSIS WITH YOU AS OPPOSED TO ANY OTHER FORM OF
26 ANESTHESIA?

27 A ON ONE OCCASION IN SANTA BARBARA FOR A ROOT
28 CANAL, A DENTIST GAVE ME SUGGESTIONS WHICH HE ASSURED ME

1 WERE NOT HYPNOSIS.

2 Q YOU DIDN'T TAKE ANY OTHER ANESTHESIA AT THAT
3 TIME WHEN THEY WERE GRINDING AND DRILLING AND GOING IN YOUR
4 TOOTH RIGHT DOWN THERE TO ALL THOSE NERVES, DID YOU?

5 A NO, I DID NOT.

6 Q SO THE SUGGESTIBILITY AND THE PROCESS THAT THE
7 DENTIST USED, SINCE YOU WEREN'T UNDER ANY OTHER FORM OF
8 ANESTHESIA, WOULD BE SOMETHING THAT WOULD BE IN YOUR
9 RECOLLECTION; IT WOULDN'T BE SOMETHING THAT WHEN YOU PRAYED
10 WAS WIPED OUT WITH THE CLEARANCE LETTERS, WAS IT?

11 MR. KLEIN: I AM GOING TO OBJECT. THAT IS A COMPOUND
12 QUESTION, YOUR HONOR.

13 THE COURT: SHE CAN ANSWER.

14 THE WITNESS: I HAD PRACTICED AS A TEENAGER CALLING
15 UPON JESUS CHRIST IN THE DENTIST CHAIR AND NOT USING
16 NOVOCAINE. I HAD DONE THAT MANY, MANY TIMES.

17 Q BY MR. LEVY: SELF-HYPNOSIS?

18 A NOT HYPNOSIS AT ALL. I CALLED UPON THE LORD TO
19 ENVELOPE ME IN THE LIGHT. MY MOTHER COULDN'T AFFORD THE
20 NOVOCAINE, AND I WAS VERY HAPPY TO DO IT IN THAT MANNER AND
21 I BELIEVED IN THE POWER OF CHRIST WITH ME.

22 AND WHEN THE DENTIST IN SANTA BARBARA SUGGESTED
23 I NOT TAKE THE ANESTHESIA, I SAID I WAS EXPERIENCED IN DOING
24 THIS. WHEN HE GAVE THE SUGGESTION, I IN MY HEART CALLED TO
25 JESUS BECAUSE I DID NOT WANT TO TIE INTO ANY TYPE OF
26 HYPNOSIS AND I HAD THE SAME EXPERIENCE THAT I HAD AS A
27 TEENAGER.

28 Q YOUR CHURCH ACTUALLY TEACHES THAT HYPNOSIS IS

1 NOT A GOOD THING, DON'T THEY?

2 A THAT'S RIGHT.

3 Q THAT WAY IF THE FOLLOWERS ARE NOT KNOWLEDGEABLE
4 IN HYPNOSIS, THEY WON'T HAVE ANY IDEA WHAT IS GOING ON WHEN
5 IT IS USED, WILL THEY?

6 A IT IS NOT USED IN MY CHURCH.

7 Q NO SUGGESTIBILITY IS USED IN YOUR CHURCH?

8 A THE POWER OF THE HOLY SPIRIT IS THE ONLY
9 SUGGESTION ANY MEMBER IN OUR CHURCH ACCEPTS.

10 Q DO THEY ACCEPT YOUR SUGGESTIONS, ELIZABETH?

11 A NO, THEY DO NOT ACCEPT MY SUGGESTIONS. THEY
12 LISTEN, THEY DELIBERATE AND THEY ACT ACCORDING TO THEIR FREE
13 WILL.

14 Q DOES YOUR CHURCH HAVE AN AVOWED VIEW ON
15 HOMOSEXUALITY?

16 A YES, WE HAVE A TEACHING ON HOMOSEXUALITY.

17 Q ISN'T IT A FACT THAT WHEN SOMEONE GOES THROUGH
18 THEIR QUARTER, THEY LEARN THAT YOUR CHURCH IS OPPOSED
19 VEHEMENTLY TO HOMOSEXUALITY; AND THEY ALSO LEARN THAT IF
20 THEY ARE GOING TO STAY IN YOUR CHURCH, THEY ARE NOT ONLY NOT
21 GOING TO PRACTICE IT, BUT THEY ARE NOT GOING TO TALK ABOUT
22 IT, THEY ARE NOT GOING TO HAVE ANYTHING TO DO WITH IT AND
23 THEY ARE NOT GOING TO HAVE ANYTHING TO DO WITH ANYONE WHO
24 DOES?

25 A I THINK YOU ARE MISCHARACTERIZING OUR TEACHING
26 GREATLY.

27 Q WHY DON'T YOU TELL ME WHAT YOUR TEACHING IS
28 WITH REGARD TO HOMOSEXUALITY?

1 A FIRST OF ALL, THERE IS A DIFFERENCE BETWEEN THE
2 INDIVIDUAL WHO IS A HOMOSEXUAL AND THE PRACTICE OF
3 HOMOSEXUALITY. WE DO NOT CONDEMN ANY INDIVIDUALS, INCLUDING
4 HOMOSEXUALS. THE TEACHING SPIRITUAL ON HOMOSEXUALITY COMES
5 FROM BOTH THE EASTERN AND WESTERN RELIGIOUS TRADITIONS.

6 WHAT I AM SPEAKING ABOUT AS FAR AS SEX IS
7 CONCERNED IS THAT WE HAVE SPIRITUAL CENTERS, SEVEN IN
8 NUMBER. THE BASE CHAKRA IS THE CHAKRA OF THE SACRED FIRE.

9 Q EXCUSE ME, MA'AM, I DON'T MEAN TO BE RUDE ABOUT
10 THE CHAKRAS AND THE SACRED FIRE. WE ARE TALKING ABOUT
11 SIMPLY ONE THING, THE POLICY OF THE CHURCH WITH REGARD TO
12 HOMOSEXUALITY.

13 A I CAN GET TO MY POINT IN TWO SENTENCES.

14 THE COURT: GO AHEAD.

15 THE WITNESS: THE BASE CHAKRA IS FOR PROCREATION AND
16 THE SEXUAL EXPERIENCE. IT IS INTENDED THAT THIS LIGHT OR
17 ENERGY BE RAISED. IT IS TAUGHT IN THE EASTERN/WESTERN
18 TRADITION THAT HOMOSEXUALITY IS A MISUSE OF THAT LIGHT AND
19 SACRED FIRE.

20 AND WE RECOMMEND AND TEACH THAT IT NOT BE
21 PRACTICED BECAUSE IT IS A HINDRANCE TO ONE'S SPIRITUAL
22 DEVELOPMENT, BUT WE CHAMPION THE RIGHT AND FREE WILL OF AN
23 INDIVIDUAL IF HE SO CHOOSE TO PRACTICE IT.

24 BUT WE SAY OUR PATH IS DEDICATED TO THE
25 SPIRITUAL LIFE AND THERE IS NO POINT YOUR BEING ON THIS PATH
26 IF YOU DECIDE TO BE A PRACTICING HOMOSEXUAL.

27 Q BY MR. LEVY: DOES THAT MEAN THE SAME THING AS
28 IF YOU ARE PRACTICING HOMOSEXUAL, YOU CANNOT BE IN OUR

1 CHURCH?

2 A IT DOES NOT SAY "CANNOT." I DON'T KNOW THE
3 SEXUAL PREFERENCES OF ALL PEOPLE THAT ARE AFFILIATED WITH
4 OUR MOVEMENT. BUT THE TEACHING IS THERE.

5 Q DO YOU HAVE ANY BOOKS IN YOUR PERSONAL LIBRARY
6 ON BLACK MAGIC AND THE OCCULT AND HYPNOSIS?

7 A YES -- NO, NOT ON HYPNOSIS, BUT ON THE OTHER
8 THINGS YOU MENTIONED.

9 Q DID YOU EVER HAVE ANY BOOKS IN YOUR LIBRARY ON
10 HYPNOSIS?

11 A I HAVE A VAST LIBRARY OF BOOKS TO WHICH MANY
12 PEOPLE HAVE CONTRIBUTED AND MY LIBRARY AND THE SUMMIT
13 UNIVERSITY LIBRARY MERGED. I CAN'T SAY THERE NEVER HAS BEEN
14 A BOOK ON THAT SUBJECT BECAUSE WE TRY TO HAVE A REFERENCE
15 LIBRARY TO WORLD THOUGHT, PHILOSOPHY AND SO FORTH.

16 Q AND YOU JUST DON'T HAVE ANY RECOLLECTION AS TO
17 WHETHER YOU'VE EVER HAD A BOOK ON HYPNOSIS OR NOT?

18 A I HAVEN'T HAD ONE IN MY HANDS AND STUDIED IT,
19 BUT THAT IS NOT SAYING IN THE ENCYCLOPEDIAS AND REFERENCE
20 MATERIALS THERE IS NOT MENTION OF IT.

21 Q WHAT ABOUT JUST A BOOK ABOUT HYPNOSIS? NOT ANY
22 ENCYCLOPEDIAS, NOT IN THE DICTIONARY BUT BOOKS ON HYPNOSIS?

23 A THE LIBRARY IS NOT CENSORED.

24 Q LET ME TRY TO HELP YOU REMEMBER. YOU REMEMBER
25 THE BOOKS THAT ARE COVERED WITH TIN FOIL?

26 A I HAVE BOOKS COVERED WITH TIN FOIL.

27 Q WHAT ABOUT THE BOOKS ABOUT HYPNOSIS THAT WERE
28 COVERED WITH TIN FOIL?

1 A I DON'T RECALL ANY SUCH BOOKS. I DON'T DO ALL
2 THE COVERING OF THEM WITH TINFOIL.

3 Q WHY WERE THEY COVERED WITH TIN FOIL?

4 A BOOKS CONSIDERED TO BE ON DESTRUCTIVE SUBJECTS,
5 LIKE BLACK MAGIC AND WITCHCRAFT, WERE SO CLASSIFIED AND SO
6 PLACED BECAUSE THEY ARE DESTRUCTIVE BOOKS.

7 Q AND WHATEVER IS IN THEM CAN JUST KIND OF LEAK
8 OUT UNLESS THEY HAVE TIN FOIL AROUND THEM?

9 A I WOULDN'T SAY SO.

10 Q ISN'T IT A FACT THAT THEY WERE COVERED WITH TIN
11 FOIL SO YOUR FOLLOWERS AND THE PEOPLE WHO WORK FOR YOU WHO
12 CLEAN UP WOULDN'T SEE THAT YOU HAD VOLUMES --

13 A NOT AT ALL.

14 Q NO?

15 A NO, THAT IS NOT A FACT. IT IS A COMMON
16 PRACTICE IN OUR ORGANIZATION IF YOU HAVE TO KEEP FILES AND
17 MATERIALS ON THE SUBJECTS OF SATANISM OR SO FORTH FOR YOUR
18 REFERENCE POINT, YOU WILL WRAP THEM IN TIN FOIL.

19 ANYONE WHO HAD ACCESS TO THE LIBRARY SIMPLY
20 NEEDED TO UNWRAP THEM AND LOOK AT THEM IF THEY WANTED TO
21 RESEARCH THAT SUBJECT FOR A PURPOSE SUCH AS AN EXPOSE ON
22 SATANISM AND THE CHURCH OF SATAN.

23 Q WHAT OTHER BOOKS IN YOUR LIBRARY ARE WRAPPED IN
24 TIN FOIL?

25 A I DON'T KNOW. I HAVEN'T -- I HAVEN'T LOOKED AT
26 SUCH BOOKS IN YEARS. ANYONE WHO IS A LIBRARIAN WORKING WITH
27 MATERIALS WOULD BE FREE TO DO THIS. MAYBE BOOKS ON THE
28 PSYCHIC, MAYBE BOOKS ON SPIRITUALISM, PRACTICES WHICH WE

1 CONSIDER DETRIMENTAL.

2 Q ON FEBRUARY THE 22ND, 1979, MR. MULL WROTE A
3 LETTER TO YOU AND THE CHURCH AND HE SAID IN THE LETTER:
4 (READING.)

5 "IF I WERE A PERMANENT STAFF
6 MEMBER, I WOULD CONSIDER GIVING YOU ALL MY
7 MONEY. BUT I HAVE NOT ARRIVED AT THE POINT
8 OF COMMITMENT AND HAVE A WIFE AND A DAUGHTER
9 TO BE PARTIALLY RESPONSIBLE FOR."

10 YOU WERE AWARE THAT MR. MULL WAS NOT
11 CONSIDERING BECOMING PERMANENT STAFF, WERE YOU NOT?

12 A I WAS AWARE OF THAT LETTER AND THAT HE SAID
13 THAT. AND I WAS ALSO AWARE THAT EVEN LATER THAN THAT, HE
14 FLAPPED BACK TO THE OPPOSITE VIEW. HE -- HE SAID MANY
15 THINGS CONCERNING PERMANENT STAFF. HE EVENTUALLY MADE
16 HIMSELF QUITE CLEAR THAT HIS DECISION WAS FIRM.

17 Q EVEN AS LATE AS THE TWO AND A HALF HOUR MEETING
18 BETWEEN THE TWO OF YOU, HE REMINDED YOU IN THAT MEETING THAT
19 HE HAD NO INTENTION OF BEING PERMANENT STAFF. HE TOLD YOU
20 THAT HE WAS IN THE VICINITY OF 60 YEARS OF AGE. AND IF
21 THINGS DIDN'T WORK OUT, HE WOULDN'T HAVE ANY MONEY, HE
22 WOULDN'T HAVE A HOME, HE WOULDN'T BE ABLE TO START HIS
23 BUSINESS AGAIN.

24 ISN'T THAT IN FACT WHAT HE TOLD YOU WITH REGARD
25 TO HIM BEING PERMANENT STAFF?

26 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THE
27 TRANSCRIPT IS IN EVIDENCE, SPEAKS FOR ITSELF.

28 THE COURT: SHE CAN ANSWER.

1 THE WITNESS: HE TOLD ME ABOUT HIS APPROACH TO
2 PERMANENT STAFF AND HE ALSO REMINDED ME THAT HE TOLD ME THAT
3 BEFORE. AND I SAID I KNEW THAT HE HAD SAID THAT BEFORE, AND
4 I HAD COME TO UNDERSTAND THAT, AND I FULLY ACCEPTED IT AND I
5 WAS NOT SEEKING HIS MONEY OR HIS CONDOMINIUM OR TO TAKE AWAY
6 FROM HIM THE RIGHT TO EDUCATE HIS DAUGHTER. I CONFIRMED HIS
7 FREE WILL TO NOT BE A PERMANENT STAFF MEMBER.

8 MR. LEVY: THAT WAS GOOD OF YOU.

9 THE WITNESS: IN THAT MEETING I DID.

10 MR. LEVY: YOUR HONOR, SINCE WE HAVE MADE A DECISION
11 THAT WE WOULD WAIT UNTIL MR. KLEIN CONCLUDED HIS CASE IN
12 CHIEF BEFORE WE STARTED OUR REBUTTAL, AT THIS POINT I WOULD
13 CONCLUDE WITH THIS WITNESS.

14 THE COURT: ALL RIGHT.

15 MR. LEVY: SUBJECT TO THE RIGHT TO RECALL HER AND MR.
16 FRANCIS ON REBUTTAL.

17 THE COURT: ALL RIGHT.

18 MR. KLEIN: JUST ONE MOMENT, PLEASE, YOUR HONOR.

19
20 REDIRECT EXAMINATION +

21 BY MR. KLEIN:

22 Q HAVE YOU EVER READ A BOOK ABOUT HYPNOSIS?

23 A NO.

24 Q THE SUMMIT UNIVERSITY LIBRARY THAT YOU REFERRED
25 TO, IS THAT OPEN TO EVERYBODY AT CAMELOT?

26 A YES.

27 MR. KLEIN: THANK YOU.

28 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

1 MR. LEVY: NOTHING FURTHER AT THIS TIME, YOUR HONOR.

2 THE COURT: YOU CAN STEP DOWN. THANK YOU.

3 THE WITNESS: THANK YOU, YOUR HONOR.

4 THE COURT: IS THAT IT FOR THE MOMENT?

5 MR. KLEIN: YES, YOUR HONOR. I HAVE ONE OTHER
6 WITNESS FOR THIS AFTERNOON.

7 THE COURT: WE ARE GOING TO STOP JUST A LITTLE BIT
8 EARLY. WE ARE GOING TO RESUME AT 1:30. REMEMBER THE
9 COURT'S ADMONITIONS. EVERYBODY BE BACK HERE READY TO
10 PROCEED AT 1:30.

11 (AT 11:34 A.M., A RECESS WAS TAKEN UNTIL
12 1:30 P.M. OF THE SAME DAY.)

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 LOS ANGELES, CALIFORNIA; MONDAY, MARCH 17, 1986 *

2 1:35 P.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 GREGORY MULL, +

7 THE DEFENDANT HEREIN, CALLED AS A WITNESS BY THE PLAINTIFF
8 UNDER THE PROVISIONS OF SECTION 776 OF THE EVIDENCE CODE,
9 HAVING BEEN PREVIOUSLY SWORN, TESTIFIED AS FOLLOWS:

10 THE CLERK: MR. MULL, YOU HAVE PREVIOUSLY BEEN SWORN
11 AND ARE STILL UNDER OATH. PLEASE STATE YOUR NAME AGAIN FOR
12 THE RECORD.

13 THE WITNESS: GREGORY MULL. G-R-E-G-O-R-Y,
14 M-U-DOUBLE L.

15 THE CLERK: THANK YOU.

16 THE COURT: PLEASE PROCEED.

17
18 DIRECT EXAMINATION +

19 BY MR. KLEIN:

20 Q GOOD AFTERNOON, MR. MULL.

21 A GOOD AFTERNOON.

22 Q MR. MULL, IN DECEMBER OF 1980, BEFORE THE
23 CHURCH FILED THEIR LAWSUIT AGAINST YOU, DID YOU WRITE A
24 LETTER ENTITLED "TO WHOM IT MAY CONCERN" IN WHICH YOU
25 DISCUSSED BUILDING CODE VIOLATIONS BY THE CHURCH?

26 A I PROBABLY DID.

27 Q AND DID YOU SEND THAT TO VARIOUS LOS ANGELES
28 COUNTY BUILDING OFFICIALS?

1 A I REMEMBER GOING TO THE CALABASAS BOARD ONLY.

2 Q AND DID YOU SEND IT TO A NUMBER OF NEWSPAPERS?

3 A NO, I DON'T RECALL THAT.

4 Q DO YOU RECALL SENDING IT TO THE NEWS CHRONICLE,
5 THAT LETTER?

6 A I WENT AND TALKED TO BOB POOL AND GAVE IT TO
7 HIM.

8 Q I AM NOT SURE IF I HEARD YOU. DID YOU --

9 A I SAID I WENT TO THE NEWS CHRONICLE AND GAVE IT
10 TO BOB POOL AND GAVE IT TO HIM PERSONALLY.

11 Q SO THE LETTER THAT YOU WROTE IN DECEMBER OF
12 1980 YOU PERSONALLY GAVE TO MR. POOL AT THE NEWS CHRONICLE?

13 A I DON'T RECALL DECEMBER OF 1980, BUT IT COULD
14 HAVE BEEN BECAUSE I WROTE THE CODE VIOLATION AND WENT TO THE
15 CALABASAS BUILDING DEPARTMENT AND THEY REFUSED TO DO
16 ANYTHING SINCE --

17 Q PLEASE TRY TO JUST CONFINE YOURSELF TO
18 ANSWERING MY QUESTIONS, OKAY?

19 A RIGHT.

20 Q THAT LETTER, THE ONE THAT TALKED ABOUT THE
21 BUILDING VIOLATIONS, DID YOU ALSO TAKE IT TO THE VALLEY
22 NEWS?

23 A I DON'T THINK -- I DON'T REMEMBER THAT.

24 Q DO YOU KNOW IF THE VALLEY NEWS WROTE A STORY
25 WHERE THEY MENTIONED YOU AND THE ALLEGATIONS YOU HAD MADE?

26 MR. LEVY: EXCUSE ME. I AM GOING TO OBJECT, YOUR
27 HONOR. CALLS FOR A CONCLUSION ON THE PART OF THIS WITNESS
28 AND SPECULATION AS TO WHAT THEY MAY OR MAY NOT HAVE DONE,

1 THE NEWSPAPER.

2 THE COURT: SUSTAINED.

3 Q BY MR. KLEIN: DID YOU SEND A COPY TO THE LAS
4 VIRGENES ENTERPRISE NEWSPAPER?

5 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THIS
6 HAS BEEN ASKED AND ANSWERED WITH REGARD DID HE SEND IT TO
7 NEWSPAPERS. MR. MULL TESTIFIED HE DOESN'T REMEMBER.

8 THE WITNESS: I STILL DON'T REMEMBER.

9 THE COURT: OVERRULED.

10 THE WITNESS: I STILL DON'T REMEMBER.

11 Q BY MR. KLEIN: DO YOU REMEMBER ANYONE ELSE
12 THAT YOU SENT THAT LETTER TO?

13 A ONLY THE NEWS CHRONICLE.

14 Q IN THE LETTER, DID YOU REQUEST THAT NO PERMIT
15 SHOULD BE ISSUED FOR THE CHURCH'S NEW YEAR'S CONFERENCE OR
16 FOR FUTURE CHURCH CONFERENCES?

17 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IF MR.
18 KLEIN HAS THE LETTER, THAT WOULD BE THE BEST EVIDENCE.

19 THE COURT: SUSTAINED.

20 MR. KLEIN: YOUR HONOR, I AM ASKING HIM WHAT HE
21 WROTE.

22 THE COURT: I HEARD THE QUESTION. PLEASE PROCEED.

23 MR. KLEIN: IS THE COURT'S POSITION I CAN'T ASK ANY
24 OTHER QUESTIONS ABOUT THE LETTER WITHOUT SHOWING IT TO HIM?
25 I AM NOT SURE WHAT THE RULE IS AT THIS POINT.

26 THE COURT: DID YOU HEAR THE BASIS FOR THE OBJECTION?

27 MR. KLEIN: YES, I DID.

28 THE COURT: THAT SHOULD BE HELPFUL. AND I INTEND

1 THAT CONSTRUCTIVELY.

2 MR. KLEIN: AT THIS TIME I WOULD ASK THAT THIS LETTER
3 DATED DECEMBER 29TH, 1980, "TO WHOM IT MAY CONCERN," BE
4 MARKED NUMBER 121 FOR IDENTIFICATION.

5 THE COURT: SO MARKED FOR IDENTIFICATION. PROCEED.
6 (MARKED FOR ID: ^ EXHIBIT 121, LETTER
7 - - - - - ^ DATED 12-29-80)

8 Q BY MR. KLEIN: MR. MULL, LOOKING AT WHAT'S BEEN
9 MARKED NUMBER 121 FOR IDENTIFICATION, IS THAT THE LETTER
10 THAT YOU WROTE TO THE -- AND GAVE TO THE BUILDING DEPARTMENT
11 AND ALSO TO THE NEWS CHRONICLE?

12 A IT COULD VERY WELL BE BECAUSE THIS IS MY
13 LETTER.

14 Q LOOK AT THE LAST PAGE, PAGE FOUR OF THAT
15 LETTER, PLEASE.

16 A YES.

17 Q AND YOU SEE ON PAGE FOUR WHERE IT SAYS "VERY
18 TRULY YOURS," AND THERE IS A SIGNATURE THERE?

19 A YES.

20 Q IS THAT YOUR SIGNATURE?

21 A I WOULD SAY SO.

22 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK THAT
23 EXHIBIT 121 FOR IDENTIFICATION BE RECEIVED IN EVIDENCE.

24 THE COURT: IT'S RECEIVED.

25 (RECEIVED EVID: ^ EXHIBIT 121)

26 MR. LEVY: NO OBJECTION, YOUR HONOR.

27 Q BY MR. KLEIN: NOW, MR. MULL, AFTER LOOKING AT
28 EXHIBIT 121, HAVE YOU HAD A CHANCE TO READ IT?

1 A NOT ALL OF IT, NO.

2 Q DO YOU WANT TO READ IT?

3 A WELL, GO AHEAD AND ASK A QUESTION. IF IT
4 BECOMES PERTINENT, I WILL READ IT.

5 Q OKAY. DO YOU RECALL REQUESTING IN DECEMBER OF
6 1980 THAT THE BUILDING DEPARTMENT SHOULD ISSUE -- NOT ISSUE
7 A PERMIT FOR THE CHURCH'S NEW YEAR'S CONFERENCE OR FOR ANY
8 NEW CHURCH CONFERENCES?

9 MR. LEVY: MR. KLEIN -- YOUR HONOR, MIGHT I SUGGEST
10 THAT MR. KLEIN MIGHT HELP MR. MULL, WHO HAS M.S., IF HE
11 WOULD POINT OUT IN THE LETTER WHERE IT SAYS THAT IF IT SAYS
12 THAT.

13 THE COURT: IT WOULD BE HELPFUL.

14 THE WITNESS: IT WOULD BE HELPFUL. THANK YOU.

15 Q BY MR. KLEIN: SURE. I WOULD BE HAPPY TO DO
16 THAT, MR. MULL.

17 I DIRECT YOUR ATTENTION --

18 A SOMETIMES THERE ARE WORDS IN THERE THAT ARE
19 DOUBLE. IT IS VERY CONFUSING.

20 MR. KLEIN: I WILL DIRECT YOUR ATTENTION TO A
21 PARTICULAR PARAGRAPH. JUST ONE MOMENT.

22 WITH THE COURT'S PERMISSION, I WILL POINT OUT
23 TO MR. MULL PRECISELY WHERE I AM TALKING ABOUT.

24 THE COURT: ALL RIGHT.

25 MR. LEVY: WHILE YOU ARE DOING THAT, WOULD YOU BE
26 KIND ENOUGH TO TELL ME ALSO?

27 MR. KLEIN: FIRST PARAGRAPH, FIRST PAGE.

28 MR. LEVY: GOOD.

1 Q BY MR. KLEIN: NOW, HAVING HAD AN OPPORTUNITY
2 TO READ THE FIRST PARAGRAPH OF THAT LETTER, DOES THAT
3 REFRESH YOUR RECOLLECTION THAT YOU REQUESTED OF THE BUILDING
4 DEPARTMENT THAT THEY DON'T ISSUE A PERMIT FOR THE CHURCH'S
5 NEW YEAR'S CONFERENCE OR FOR FUTURE CONFERENCES?

6 A I HAVE NOT READ IT, BUT IT COULD BE WHAT YOU
7 SAY.

8 MR. LEVY: YOUR HONOR, I WOULD SUGGEST THAT MAYBE MR.
9 KLEIN COULD READ THAT FIRST PARAGRAPH TO THE ENTIRE COURT SO
10 THEY COULD ALL HEAR WHAT MR. MULL HAD TO SAY.

11 THE COURT: PLEASE DO.

12 MR. KLEIN: OKAY. (READING.)

13 "THIS ORGANIZATION HAS HAD
14 CONFERENCES EVERY THREE MONTHS WITH
15 THOUSANDS OF PEOPLE IN ATTENDANCE, AND FOR
16 ALMOST THE LAST TWO YEARS HAS NOT HAD A
17 PERMIT FROM THE REGIONAL PLANNING DIRECTOR
18 TO ERECT A TENT. A PERMIT CAN BE GRANTED
19 FOR A SEVEN DAY PERIOD TWICE A YEAR, BUT NOT
20 FOUR TIMES A YEAR. BECAUSE OF PAST
21 VIOLATIONS, NO PERMIT SHOULD BE ISSUED AT
22 THIS TIME FOR THE NEW YEAR'S CONFERENCE OR
23 FOR FUTURE TIMES TO MAKE UP FOR THIS GROSS
24 ILLEGALITY. THEY TRIED TO HIDE THE TENTS
25 AMONG THE TREES AND HOPED THIS WOULD NOT BE
26 SEEN. A COUPLE OF YEARS AGO, WHEN I WAS ON
27 STAFF, THE FIRE MARSHALL (SIC) CAME BY AND
28 TOLD THEM TO TAKE OUT THE BLOWER HEATERS AS

1 THEY WERE A FIRE HAZARD. THEY TOOK THEM
2 OUT, THEN AFTER HIS INSPECTION THEY WERE PUT
3 RIGHT BACK IN. THIS ORGANIZATION HAS BECOME
4 A LAW UNTO ITSELF, DISREGARDING CODES AND
5 RULES OF PUBLIC SAFETY."

6 Q NOW, DOES THAT REFRESH YOUR RECOLLECTION?

7 A YES, IT DOES. THANK YOU FOR READING IT.

8 Q THANK YOU.

9 NOW THAT REFRESHES YOUR RECOLLECTION THAT YOU
10 ASKED THE BUILDING DEPARTMENT TO NOT PERMIT THE CHURCH TO
11 HAVE THEIR NEW YEAR'S CONFERENCE OR ANY FUTURE CONFERENCES;
12 IS THAT RIGHT?

13 A AT LEAST DO IT LEGALLY BECAUSE THEY SEEMED TO
14 DO EVERYTHING ILLEGALLY.

15 Q MY QUESTION IS DID YOU ASK THE BUILDING
16 DEPARTMENT TO NOT PERMIT THEM TO HAVE ANYMORE CONFERENCES?

17 MR. LEVY: WE WILL STIPULATE, YOUR HONOR, THAT IF IT
18 IS IN THE LETTER --

19 THE WITNESS: IT'S TRUE WHAT I WROTE.

20 Q BY MR. KLEIN: NOW, WHAT I WILL ALSO DO IS READ
21 TO YOU THE SECOND PARAGRAPH OF THE LETTER ON PAGE ONE.

22 A RIGHT.

23 THE COURT: IT IS IN EVIDENCE, COUNSEL.

24 MR. KLEIN: WELL, I JUST WANT TO --

25 THE WITNESS: I WOULD LIKE TO HEAR IT THOUGH BECAUSE
26 I CAN'T READ IT.

27 Q BY MR. KLEIN: I WON'T READ IT. I WILL JUST
28 ASK YOU A QUESTION.

1 DID YOU ALSO ASK THEM TO CLOSE DOWN SUMMIT
2 UNIVERSITY? DO YOU REMEMBER DOING THAT?

3 A I COULD HAVE VERY WELL BECAUSE THEY CHANGED ALL
4 THE RULES HENCEFORTH.

5 MR. LEVY: YOUR HONOR, THE LETTER IS IN EVIDENCE.
6 THAT IS A MISCHARACTERIZATION OF WHAT THE LETTER ACTUALLY
7 SAYS.

8 THE COURT: JUST A SECOND. GENTLEMEN, WE ARE NOT
9 GOING TO HAVE A SERIES OF SOLILOQUIES.

10 MR. KLEIN, THE LETTER IS IN EVIDENCE.

11 MR. KLEIN: YES, YOUR HONOR.

12 THE COURT: WHAT HE SAID AT THE TIME IN THE LETTER IS
13 IN EVIDENCE.

14 MR. KLEIN: I APPRECIATE THAT.

15 THE COURT: AND MERELY TO GO THROUGH IT UNDULY
16 CONSUMES TIME.

17 MR. KLEIN: I APPRECIATE THAT, YOUR HONOR.

18 Q MR. MULL, DID YOU RECEIVE A RESPONSE BACK FROM
19 THE DEPARTMENT OF REGIONAL PLANNING TO YOUR COMPLAINTS TO
20 THEM?

21 A I STARTED TO TELL YOU FORMERLY WHAT MR.
22 GRIFFITH TOLD ME. HE WAS A BUILDING INSPECTOR. DO YOU WANT
23 TO HEAR THAT?

24 Q NO. I WOULD LIKE -- WHAT I WOULD LIKE YOU TO
25 DO IS ANSWER MY QUESTION.

26 HAVE YOU RECEIVED A LETTER BACK --

27 A I DON'T RECALL.

28 Q -- FROM A NORMAN MURDOCH, PLANNING DIRECTOR OF

1 THE DEPARTMENT OF REGIONAL PLANNING, WHERE HE DISCUSSED YOUR
2 COMPLAINTS?

3 A I DON'T RECALL AT THIS POINT.

4 MR. KLEIN: AT THIS TIME I WOULD ASK THAT THIS
5 DOCUMENT BE MARKED NUMBER 122 FOR IDENTIFICATION.

6 THE COURT: SO MARKED.

7 (MARKED FOR ID: ^ EXHIBIT 122, LETTER

8 - - - - - ^ DATED 1-20-81)

9 Q BY MR. KLEIN: DID YOU RECEIVE THE LETTER THAT
10 WE HAVE MARKED NUMBER 122 FOR IDENTIFICATION?

11 A I COULD HAVE, YES.

12 Q IT IS ADDRESSED TO YOU, IS IT NOT?

13 A YES, IT IS.

14 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK THAT
15 NUMBER 122 FOR IDENTIFICATION BE RECEIVED IN EVIDENCE.

16 MR. LEVY: NO OBJECTION, YOUR HONOR.

17 THE COURT: IT'S RECEIVED,

18 (RECEIVED EVID: ^ EXHIBIT 122)

19 MR. LEVY: YOUR HONOR, MAY WE APPROACH THE BENCH
20 MOMENTARILY?

21 THE COURT: ALL RIGHT.

22 (THE FOLLOWING PROCEEDINGS WERE HELD

23 AT THE BENCH:)

24 MR. LEVY: THERE IS A YOUNG LADY WHO WITNESSED -- A
25 WITNESS THAT WE KNOW NOTHING ABOUT AT THE TIME. SHE IS A
26 FORMER CHURCH MEMBER. SHE SHOWED UP HERE IN COURT. WE JUST
27 FOUND OUT THAT SHE IS WILLING TO TESTIFY. SHE HAS TO GO
28 BACK TO NORTHERN CALIFORNIA.

1 IF IT WOULD -- BECAUSE OF THE SCHEDULING, IF WE
2 COULD STOP MR. MULL'S EXAMINATION NOW, PUT HER ON FOR SOME
3 BRIEF PERIOD OF TIME BECAUSE WE HAVE SOME TIME CONSTRAINTS
4 WITH HER.

5 THE COURT: WAS SHE UNDER SUBPOENA?

6 MR. LEVY: NO, SHE WAS NOT. WE DIDN'T EVEN KNOW
7 ABOUT HER. THE REASON WE GOT HER NAME IS SHE WAS CALLED BY
8 THE CHURCH. AFTER SHE WAS CALLED BY THE CHURCH TO COME IN
9 AND TESTIFY AND SHE DECLINED TO DO IT FOR THEM, SHE LET SOME
10 OF OUR PEOPLE KNOW ABOUT IT AND SHE'S JUST MADE THE OFFER
11 DURING THE LUNCH HOUR.

12 MR. -- MY ASSOCIATE, MR. MIDDLETON, JUST CAME
13 IN AND TOLD ME AFTER CONFERRING WITH HER FAMILY, SHE HAS
14 AGREED TO TESTIFY.

15 MR. KLEIN: MIGHT I BE HEARD FOR TWO THINGS? ONE IS
16 I WOULD OBJECT TO INTERRUPTING MY CASE TO PUT ON COUNSEL'S
17 CASE. WE ARE ON MY CASE RIGHT NOW. BUT SECONDLY, UP TO NOW
18 I HAVE ASKED MR. LEVY AS RECENTLY AS LUNCH WHO HIS REBUTTAL
19 WITNESSES WERE. THIS WITNESS WAS NOT MENTIONED.

20 THE COURT: APPARENTLY HE DIDN'T KNOW AT THE TIME.

21 MR. KLEIN: I AM NOT SUGGESTING HE DID. WHAT I AM
22 SUGGESTING I THINK IT WOULD BE UNFAIR TO HAVE THIS WITNESS
23 TESTIFY VERY QUICKLY AND LEAVE WITHOUT GIVING ME ANY
24 OPPORTUNITY TO PREPARE OR TO HAVE KNOWN SHE WAS --

25 THE COURT: HOW MUCH TIME DO YOU NEED WITH MULL?

26 MR. KLEIN: I WILL BE WITH MULL FOR --

27 THE COURT: REALISTICALLY.

28 MR. KLEIN: A HALF HOUR, 40 MINUTES.

1 MR. LEVY: YOU TOLD ME 20 MINUTES.

2 THE COURT: HOW LONG?

3 MR. KLEIN: A HALF HOUR, 40 MINUTES, DEPENDING ON HOW
4 LONG HE ANSWERS.

5 THE COURT: HOW LONG DO YOU NEED WITH THIS WITNESS
6 YOU WISH TO CALL?

7 MR. LEVY: HALF HOUR.

8 THE COURT: I TELL YOU WHAT I WILL DO. I WILL LET
9 YOU GO FOR 30 MINUTES. AT THAT POINT WE WILL PUT HER ON.

10 MR. KLEIN: WHAT ABOUT MY CONCERN THAT I HAVE NEVER
11 HEARD OF THIS WITNESS, I STILL DON'T EVEN KNOW WHO SHE IS,
12 AND I AM GOING TO GET FIVE MINUTES TO KNOW WHO SHE IS AND
13 THEN I AM SUPPOSED TO QUESTION HER?

14 MR. LEVY: I AM SURE --

15 MR. KLEIN: LET ME FINISH.

16 WHEN MR. LEVY COMPLAINED I MIGHT BE PUTTING
17 SOMEBODY ON THAT WASN'T ON MY LIST, HE GOT TWO DAYS TO
18 PREPARE FOR THE PERSON. TO TELL ME I HAVE TO --

19 THE COURT: YOU ALL DISCUSS IT AMONG YOURSELVES. I
20 AM GOING TO GIVE YOU -- THE 30 MINUTES IS STARTING TO RUN
21 NOW. YOU ARE USING PART OF YOUR TIME WITH RHETORIC.

22 NOW, SO THAT YOU UNDERSTAND, I AM GOING TO GIVE
23 YOU 28 MORE MINUTES WITH MR. MULL, AND THEN WE ARE GOING TO
24 TAKE A RECESS AND THEN WE ARE GOING TO PUT HER ON. DURING
25 THE RECESS, YOU CAN DISCUSS WHAT THE SUBSTANCE OF HER
26 TESTIMONY WILL BE.

27 MR. LEVY: OKAY. MR. MIDDLETON WILL DO THAT WITH
28 YOU.

1 MR. KLEIN: IT IS OVER MY OBJECTION, BUT THAT IS THE
2 RULING.

3 MR. LEVY: THANK YOU, YOUR HONOR.

4 THE COURT: I DOUBT THAT IT IS ANYTHING THAT IS
5 REALLY NEW OR DIFFERENT.

6 MR. KLEIN: I AM JUST BUILDING UP MR. MULL TO TELL
7 ME --

8 THE COURT: I DOUBT THAT IT IS REALLY NEW AND
9 DIFFERENT. TWENTY-SEVEN MINUTES.

10 (THE PROCEEDINGS WERE RESUMED IN OPEN
11 COURT IN THE PRESENCE OF THE JURY:)

12 MR. LEVY: THANK YOU, YOUR HONOR.

13 MR. KLEIN: COULD -- YOUR HONOR, COULD THE
14 STENOGRAPHER READ BACK TO ME THE LAST QUESTION AND ANSWER?
15 THE LAST QUESTION, I AM SORRY.

16 THE COURT: THE LAST THING THAT HAPPENED WAS THAT 122
17 WAS RECEIVED IN EVIDENCE.

18 MR. KLEIN: THANK YOU, YOUR HONOR.

19 THE COURT: YOU ARE WELCOME.

20 Q BY MR. KLEIN: MR. MULL, DID YOU MAKE
21 ALLEGATIONS TO THE NEWSPAPERS OR TO THE CITY BUILDING
22 DEPARTMENT PRIOR TO THE LAWSUIT THAT THE CHURCH FILED
23 AGAINST YOU THAT THERE WERE VARIOUS VIOLATIONS AT THE WILL
24 OF GOD FOCUS IN DOWNTOWN LOS ANGELES?

25 MR. LEVY: AGAIN, YOUR HONOR, WE WILL OBJECT. BEST
26 EVIDENCE, THE DOCUMENTS SPEAK FOR THEMSELVES.

27 THE COURT: SUSTAINED.

28 MR. KLEIN: YOUR HONOR, CAN I BE HEARD ON THE RECORD

1 ON THAT?

2 THE COURT: PLEASE PROCEED.

3 MR. KLEIN: YOUR HONOR, I DON'T UNDERSTAND THAT
4 OBJECTION OR THE RULING AT ALL. I -- I'D JUST LIKE --

5 THE COURT: ARE YOU ASKING REGARDING DOCUMENTS OR --
6 WHY DON'T YOU CLARIFY YOUR QUESTION.

7 MR. KLEIN: THERE IS NO DOCUMENT IN EVIDENCE ON THIS,
8 YOUR HONOR. I DON'T UNDERSTAND --

9 THE COURT: THERE ARE LOTS OF DOCUMENTS.

10 MR. KLEIN: NOT ON THIS SUBJECT, YOUR HONOR.

11 THE COURT: WHY DON'T YOU CLARIFY YOUR QUESTION.

12 MR. KLEIN: IT SEEMED CLEAR, YOUR HONOR.

13 Q I AM ASKING, MR. MULL, DID YOU EVER WRITE A
14 LETTER TO A NEWSPAPER OR A CITY BUILDING DEPARTMENT PRIOR TO
15 THE LAWSUIT FILED BY THE CHURCH AGAINST YOU WHERE YOU TOLD
16 THEM THERE WERE VARIOUS VIOLATIONS AT THE WILL OF GOD FOCUS?

17 A I CANNOT REMEMBER. I MAY HAVE PUT A PHONE CALL
18 TO THEM OR A VISIT TO THEM. I DON'T REMEMBER LETTERS AT
19 THIS POINT.

20 Q AND DID YOU RECALL A TIME WHEN THE CITY
21 BUILDING INSPECTOR INFORMED YOU THAT YOUR ALLEGATIONS HAD
22 BEEN CHECKED OUT AND THERE WERE NO VIOLATIONS? DID THEY
23 EVER TELL YOU THAT?

24 A I WAS TOLD THIS BY -- BY THE BUILDING
25 DEPARTMENT AT CAMELOT, THAT THAT WAS THE CASE. BUT NOT
26 BY -- DIRECTLY BY THE DEPARTMENT OF PUBLIC SAFETY.

27 Q DURING HER TESTIMONY, ELIZABETH CLARE PROPHET
28 TESTIFIED THAT DURING THE FIRST QUARTER AT SUMMIT

1 UNIVERSITY, WHEN YOU WERE IN YOUR FIRST QUARTER IN 1975,
2 THAT SHE HAD COUNSELED YOU BECAUSE OF ARGUMENTS YOU WERE
3 HAVING WITH YOUR ROOMMATE; IS THAT CORRECT?

4 A I DO NOT KNOW WHAT SHE WAS REFERRING TO.

5 Q DO YOU REMEMBER HAVING ARGUMENTS WITH YOUR
6 ROOMMATE DURING THAT FIRST SESSION AT SUMMIT UNIVERSITY?

7 A I THOUGHT ALEXANDER BENNETT WAS MY ROOMMATE.
8 WE NEVER HAD A SINGLE ARGUMENT.

9 Q ARE YOU CERTAIN DURING THE FIRST QUARTER AT
10 SUMMIT UNIVERSITY IN 1975, YOU DIDN'T HAVE ARGUMENTS WITH
11 YOUR ROOMMATE?

12 A IT WAS NOT MY ROOMMATE THAT I RECALL.

13 Q DURING THE FIRST QUARTER AT SUMMIT UNIVERSITY,
14 IN JANUARY, 1975, DID YOU GET ALONG VERY WELL WITH YOUR
15 ROOMMATE?

16 A I THOUGHT ALEXANDER BENNETT WAS MY ROOMMATE AND
17 WE GOT ALONG VERY WELL. IF I KNEW THE NAME THAT YOU WERE
18 REFERRING TO, IT MIGHT REFRESH MY MEMORY MORE.

19 Q DID YOU EVER WRITE A LETTER A COUPLE OF YEARS
20 LATER SAYING THAT WHEN YOU WOULD GO BACK TO SUMMIT
21 UNIVERSITY, YOU DON'T WANT TO HAVE A ROOMMATE AT ALL BECAUSE
22 OF ALL THE PROBLEMS YOU HAD DURING THE PREVIOUS QUARTERS
23 WITH YOUR ROOMMATES?

24 A I DON'T REMEMBER THAT.

25 MR. KLEIN: AT THIS TIME I WOULD ASK THAT THIS
26 DOCUMENT BE MARKED NUMBER 123 FOR IDENTIFICATION.

27 THE COURT: SO MARKED.

28 (MARKED FOR ID: ^ EXHIBIT 123, LETTER

1 - - - - - ^ DATED 3-4-78)

2 Q BY MR. KLEIN: LOOKING AT THE LETTER DATED
3 MARCH 4TH, 1978, NUMBER 123 FOR IDENTIFICATION, COULD YOU
4 LOOK AT THE SECOND PAGE?

5 A YES.

6 Q IS THAT YOUR SIGNATURE THERE?

7 A YES, IT IS.

8 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK THAT
9 THIS LETTER BE RECEIVED IN EVIDENCE.

10 MR. LEVY: NO OBJECTION, YOUR HONOR.

11 THE COURT: IT'S RECEIVED.

12 (RECEIVED EVID: ^ EXHIBIT 123)

13 Q BY MR. KLEIN: MR. MULL, TO MAKE IT EASIER FOR
14 YOU, IF YOU LIKE, I WILL READ THE WHOLE LETTER AND THEN I
15 WILL ASK YOU SOME QUESTIONS, OKAY?

16 A RIGHT.

17 Q (READING.)

18 " MARCH 4, 1978.

19 " BELOVED MONROE:

20 " I AM LOOKING FORWARD TO SEEING
21 YOU AT THE NEXT CONFERENCE, AT THE NATIONAL
22 ADVISORY COUNSEL MEETING.

23 " PETER MIDDENDORF (SIC)

24 RETURNED RECENTLY FROM BALTIMORE AND TOLD ME
25 THAT HE AUTHORIZED \$2,000 FOR THE THIRD TIME
26 FOR OUR MONTESSORI SCHOOL. I THANKED HIM ON
27 BEHALF OF THE CHILDREN OF THE MONTESSORI
28 SCHOOL AND HE SAID HE DID IT ONLY FOR ME,

1 THAT HE DOES NOT APPROVE OF ORGANIZED
2 RELIGION. I THEN THANKED HIM FOR DOING IT
3 FOR ME. HIS GAME IS NOT TO LOOK INTO OUR
4 RELIGION FOR FEAR OF A DESIRE FOR MAKING A
5 LARGER COMMITMENT. ANYWAY, YOUR TWO DINNERS
6 WITH HIM HELPED NET \$6,000 FOR THE SCHOOL,
7 AND, ALSO OUR SUPPLY DECREES. WOULD YOU
8 WRITE AND THANK HIM AS HE SAID IT IS
9 AUTOMATIC THAT YOU WOULD RECEIVE IT THIS
10 YEAR.

11 "I AM SORRY I DID NOT FIND TIME
12 TO WRITE BEFORE THIS AND TO MAIL THE PLAN ON
13 HOUSING FOR SINGLE STUDENTS AT SUMMIT
14 UNIVERSITY. WE JUST FINISHED COMPLETING
15 THIS AS ANOTHER GIFT FOR THE SCHOOL. I
16 DISCUSSED WITH MOTHER SINGLE ROOM HOUSING
17 VERSUS DOUBLE OCCUPANCY AND SHE SAID THAT
18 SHE WAS AWARE IN MONASTIC LIFE THEY LIVED
19 SINGLY. THE ROOMS ARE AS SMALL AS POSSIBLE
20 BUT FIT THE CODE OF 100 SQUARE FEET PER ROOM
21 CAPACITY. I WOULD LIKE TO DISCUSS WITH YOU
22 IN PERSON IF YOU WISH MY REASONING FOR
23 SINGLE OCCUPANCY. AT MY THIRD QUARTER I
24 WILL PAY EXTRA TO LIVE ALONE BECAUSE THE
25 CROSS I BORE WITH ROOM MATES (SIC) FIRST AND
26 SECOND QUARTERS.

27 "IT WAS A HINDERANCE TO MY
28 SPIRITUAL GROWTH MORE THAN A LEARNING

1 EXPERIENCE.

2 "ALL BEST WISHES AND THANK YOU
3 FOR ALL YOUR DEDICATION TO THE ASCENDED
4 MASTERS AND US STUDENTS.

5 "MOST SINCERELY," SIGNED
6 "GREGORY MULL."

7 MY QUESTION IS IN THE BOTTOM OF THAT FIRST PAGE
8 WHERE IT SAYS:

9 "AT MY THIRD QUARTER I WILL PAY
10 EXTRA TO LIVE ALONE BECAUSE THE CROSS I BORE
11 WITH ROOM MATES (SIC) FIRST AND SECOND
12 QUARTERS,"

13 DOES THAT REFRESH YOUR RECOLLECTION THAT YOU
14 HAD ARGUMENTS WITH YOUR ROOMMATES IN THE FIRST QUARTER?

15 A FIRST QUARTER, I DON'T KNOW WHAT YOU ARE
16 TALKING ABOUT. THE SECOND QUARTER, YES.

17 Q DO YOU KNOW WHY YOU WROTE THIS IN THE LETTER
18 ABOUT FIRST AND SECOND QUARTERS?

19 A NO, I DON'T. IT IS TOO FAR BACK.

20 Q I WANT TO READ YOU SOME TESTIMONY FROM A
21 TRANSCRIPT OF THIS TRIAL, TESTIMONY OF KATHLEEN LEVY. I AM
22 GOING TO READ FROM PAGE 647, LINE 19, THROUGH 648, LINE 4.

23 MR. LEVY: WHAT WAS THE PAGE AGAIN?

24 MR. KLEIN: 647, LINE 19 -- I AM SORRY. I WANT TO
25 READ FIRST 644, LINE 27, TO 645, LINE 18. 644 --

26 THE COURT: LET'S START OVER. WHERE DO YOU WANT TO
27 START?

28 MR. KLEIN: 644, LINE 27, YOUR HONOR, AND I AM GOING

1 TO GO TO 647, LINE 18.

2 MR. LEVY: YOU KEEP SAYING 644. MY PAGES ARE
3 NUMBERED 1 THROUGH 100.

4 MR. KLEIN: THE SECOND DAY OF KATHLEEN LEVY. THERE
5 IT IS.

6 MR. LEVY: LINE 18 TO WHERE?

7 MR. KLEIN: BEGINNING ON LINE 27 ON 644 TO 645, LINE
8 18.

9 THE COURT: WHY DON'T YOU LET THE REST OF US IN ON
10 WHAT YOU ARE DISCUSSING.

11 MR. KLEIN: I JUST SAID THE SAME THING. 644, LINE
12 27, THROUGH 645, LINE 18.

13 THE COURT: GO AHEAD.

14 MR. KLEIN: (READING.)

15 "Q ALL RIGHT. AND THEN FOR
16 THE LATTER PART OF '83, THIS CONDITION
17 IMPROVED AND HE SEEMED TO START TO COPE
18 BETTER?

19 "A THAT'S RIGHT.

20 "Q DID YOU CONTINUE TO SEE
21 HIM?

22 "A NO. THERE WAS ABOUT A
23 SIX- OR SEVEN-MONTH PERIOD OF TIME WHEN
24 GREGORY DIDN'T COME IN TO SEE ME. IT WAS
25 FROM SEPTEMBER OR OCTOBER OF '83 UNTIL APRIL
26 OF '84.

27 "WHEN HE CAME IN TO SEE
28 YOU AGAIN IN APRIL OF '84 --

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

"THAT'S RIGHT.

"-- WAS THERE A REASON HE
CAME TO SEE YOU IN APRIL OF '84?

"ANSWER" --

THE COURT: WAIT A MINUTE. WHY DON'T YOU IDENTIFY
QUESTION, ANSWER, QUESTION, ANSWER.

MR. KLEIN: YES. (READING.)

"Q WHEN HE CAME IN TO SEE
YOU AGAIN IN APRIL OF '84 --

"A THAT'S RIGHT.

"Q -- WAS THERE A REASON HE
CAME TO SEE YOU IN APRIL OF '84?

"A HE CALLED UP AND HE WAS
IN A PANIC. I SAID, 'GREGORY, COME ON OVER
RIGHT AWAY.'

"HE CAME IN. HE SAID, 'I
AM REALLY TERRIFIED. I AM FRIGHTENED TO
DEATH.'

"I SAID, 'WHAT'S THE
MATTER, GREGORY?'

"HE SAID, 'ELIZABETH HAS
IDENTIFIED ME TO HER MEMBERSHIP AS THE BEAST
OF BLASPHEMY.'"

Q NOW, KATHLEEN LEVY THEN WENT ON TO TESTIFY THAT
TWO MONTHS AFTER THAT, YOU HAD YOUR STROKE. YOU HAVE
THOSE --

A I THOUGHT IT WAS TWO DAYS AFTER THAT.

Q AND YOU HAD YOUR STROKE IN ABOUT JUNE OF 1984;

1 IS THAT RIGHT?

2 A YES.

3 Q AND YOU THOUGHT IT WAS TWO DAYS AFTER
4 ELIZABETH --

5 A AFTER SHE CALLED ME THE BEAST OF BLASPHEMY.
6 BUT I DON'T KNOW FOR SURE.

7 Q IT WAS A SHORT TIME AFTER ELIZABETH CLARE
8 PROPHET CALLED YOU THE BEAST OF BLASPHEMY --

9 A AND THE SERPENT.

10 Q LET ME FINISH MY QUESTION, PLEASE.

11 IT WAS A SHORT TIME -- TWO DAYS, TWO WEEKS, TWO
12 MONTHS -- AFTER ELIZABETH CLARE PROPHET CALLED YOU THE BEAST
13 OF BLASPHEMY THAT YOU HAD YOUR STROKE?

14 A YES.

15 Q YOU ARE SURE OF THAT?

16 A I THOUGHT IT WAS.

17 Q HAD SHE EVER CALLED YOU THE BEAST OF BLASPHEMY
18 BEFORE?

19 A NEVER. NOR ANYBODY.

20 Q YOU ARE POSITIVE OF THAT, RIGHT?

21 A SHE NEVER CALLED ME THE BEAST OF BLASPHEMY
22 BEFORE THAT I CAN RECALL.

23 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK THAT
24 THIS DOCUMENT BE MARKED NUMBER 124 FOR IDENTIFICATION.

25 THE COURT: SO MARKED.

26 (MARKED FOR ID: ^ EXHIBIT 124, LETTER

27 - - - - - ^ DATED 4-16-82)

28 Q BY MR. KLEIN: MR. MULL, PERHAPS YOU CAN LOOK

1 AT THE LAST PAGE OF THE LETTER?

2 A YES.

3 Q ON THE LAST PAGE, THERE IS A P.S. BEFORE THE
4 P.S., IT SAYS, "MOST SINCERELY, GREGORY." DO YOU SEE THAT?

5 A YES.

6 Q IS THAT YOUR SIGNATURE?

7 A YES.

8 Q DID YOU WRITE THIS LETTER?

9 A IT LOOKS VERY FAMILIAR, MY WRITING, YES.

10 Q IT IS DATED AUGUST 16TH, 1982?

11 A YES.

12 MR. KLEIN: YOUR HONOR, I WOULD ASK THAT THIS LETTER
13 BE RECEIVED IN EVIDENCE.

14 MR. LEVY: NO OBJECTION, YOUR HONOR.

15 THE COURT: RECEIVED.

16 (RECEIVED EVID: ^ EXHIBIT 124)

17 Q BY MR. KLEIN: MR. MULL, I'D LIKE TO DIRECT
18 YOUR ATTENTION TO THE VERY LAST PAGE OF THE LETTER. OKAY?
19 AND AT THE BOTTOM IT SAYS: (READING.)

20 "MOST SINCERELY, GREGORY."

21 AND THEN IT SAYS: "P.S. E.C.P. IS
22 NOT THE WITNESS MENTIONED IN REVELATION NOR
23 I THE BEAST OF BLASPHEMY."

24 IS THAT WHAT IT SAYS?

25 A CORRECT. YES, CORRECT.

26 Q NOW, IF SHE NEVER CALLED YOU THE BEAST OF
27 BLASPHEMY UNTIL 1984, WHY WERE YOU WRITING ABOUT IT IN THIS
28 LETTER DATED AUGUST 16TH, 1982?

1 A WELL, I DON'T KNOW WHEN IN REFERENCE TO THIS
2 LETTER THAT SHE CALLED ME THAT. BUT I MUST HAVE BEEN CALLED
3 THAT BY HER IN ORDER TO PUT THIS P.S. IN THERE.

4 MR. LEVY: EXCUSE ME, YOUR HONOR, I AM GOING TO
5 OBJECT TO THAT. WE ALL KNOW MR. MULL HAS M.S. THOSE WORDS
6 ARE USED IN HERE AS PART OF THE TEACHING OF THE CHURCH. SHE
7 MAY OR MAY NOT HAVE SAID IT. BUT TO TEST THIS WITNESS'
8 MEMORY WHEN WE KNOW HOW ILL HE IS IS A LITTLE BIT EXCESSIVE.

9 THE COURT: THAT IS UP TO THE JURY TO EVALUATE ALL OF
10 THE EVIDENCE AT TRIAL.

11 THE WITNESS: IT IS ALSO HARD FOR ME TO READ BECAUSE
12 AFTER MY FIRST M.S. ATTACK, I WAS BLINDED IN MY RIGHT EYE
13 FOR A FEW MONTHS.

14 Q BY MR. KLEIN: MR. MULL --

15 A AND NOW I SEE DOUBLE.

16 Q MR. MULL, IN PREPARATION FOR THIS TRIAL, DID
17 SOMEBODY SUGGEST TO YOU THAT IF YOU TESTIFIED THAT YOU WERE
18 FIRST CALLED THE BEAST OF BLASPHEMY SOMETIME IN 1984, CLOSE
19 TO WHEN YOU HAD YOUR STROKE, THEN YOU WOULD BE ABLE TO BLAME
20 THE WHOLE STROKE ON THE CHURCH? DID SOMEONE SUGGEST THAT TO
21 YOU, MR. MULL?

22 A NOT THAT I RECALL, NO. BUT I WAS IN TREMENDOUS
23 STRESS WHEN I HEARD THAT STATEMENT BECAUSE THE BEAST OF
24 BLASPHEMY AND THE FALSE PROPHET ARE TO BE THROWN IN THE LAKE
25 OF FIRE AT THE SAME TIME IN THE BOOK OF REVELATION.

26 MR. KLEIN: THANK YOU.

27 THE WITNESS: AND SO IT IS NOT GOOD TO BE CALLED
28 THIS.

1 MR. KLEIN: THANK YOU.

2 I HAVE NO FURTHER QUESTIONS.

3 MR. LEVY: JUST ONE QUESTION AT THIS TIME AND THEN WE
4 WILL TAKE THAT RECESS FOR THIS OTHER WITNESS.

5

6

CROSS-EXAMINATION +

7

BY MR. LEVY:

8

Q GREGORY, DID I EVER TELL YOU ANYTHING OTHER

9

THAN TO TELL THE TRUTH BEFORE THIS TRIAL?

10

A YOU HAVE CONSTANTLY TOLD ME TO TELL THE TRUTH

11

AND ONLY THE TRUTH AND NEVER TO FABRICATE. THIS HAS BEEN

12

LIKE A BROKEN RECORD, ALWAYS TELL THE TRUTH. YOU EVEN TOLD

13

ME BEFORE I WENT ON THE STAND NOW YOU SAID, "JUST TELL THE

14

TRUTH."

15

MR. LEVY: AT THIS TIME, YOUR HONOR, I WOULD RESERVE

16

THE RIGHT TO CALL MR. MULL BACK TO THE STAND ON OUR PART OF

17

REBUTTAL AND --

18

THE COURT: ALL RIGHT.

19

MR. LEVY: AND IF I MAY, I WILL HAVE A MOMENT TO GO

20

OUTSIDE AND GET THE OTHER WITNESS.

21

THE COURT: WHY DON'T YOU ALL HAVE JUST A SHORT TALK

22

AND MAYBE YOU WON'T HAVE TO TAKE A RECESS. LET'S STAND UP

23

AND STRETCH FOR A MOMENT.

24

YOU CAN STEP DOWN, MR. MULL. THANK YOU.

25

LET'S TAKE A SHORT RECESS.

26

(THE FOLLOWING PROCEEDINGS WERE HELD IN

27

CHAMBERS:)

28

MR. MIDDLETON: BASICALLY WHAT WE HAVE HERE --

1 MR. LEVY: THE JUDGE HAS ALREADY SUGGESTED HE IS
2 GOING TO ALLOW THIS WITNESS TO TESTIFY. MR. KLEIN IS THE
3 ONE WITH THE OBJECTIONS. WHY DON'T YOU LET HIM START.

4 MR. KLEIN: I HAVE TWO OBJECTIONS. FIRST OBJECTION
5 IS THAT THIS WITNESS SAT IN THIS COURTROOM THIS MORNING AND
6 SHE ALSO SAT IN HERE THE BEGINNING OF THIS AFTERNOON. AND
7 WE HAVE A DIRECT RULE AS -- ABOUT WITNESSES SITTING IN ON
8 THE OTHER SIDE'S CASE. AND THAT'S BEEN VIOLATED. SHE SAT
9 HERE.

10 SECONDLY, TO SUGGEST THAT SHE JUST CAME DOWN
11 HERE OUT OF THE BLUE AND COUNSEL DIDN'T KNOW ANYTHING ABOUT
12 IT, I HAVE TROUBLE BELIEVING SHE JUST WANDERED INTO THIS
13 COURTROOM.

14 WHAT'S HAPPENED HERE IS I HAVE ASKED THEM
15 NUMEROUS TIMES WHO HE IS GOING TO BE PUTTING ON ON HIS
16 REBUTTAL CASE. HE ALWAYS TOLD ME THE SAME WITNESSES --
17 ELIZABETH, RANDALL AND MR. MULL. NOW ALL OF A SUDDEN THIS
18 WOMAN WANDERS IN, AND I AM SUPPOSED TO BE READY TO
19 CROSS-EXAMINE HER AND I THINK THAT IS UNFAIR.

20 I HAVE GIVEN HIM PRIOR NOTICE. I GAVE HIM TWO
21 DAYS NOTICE --

22 THE COURT: I HAVE HEARD YOU SAY THAT BEFORE.

23 MR. LEVY: MAY I RESPOND?

24 THE COURT: ONE OF YOU.

25 MR. LEVY: THIS IS -- THIS IS A LIE THAT YOU SAID AND
26 I WANT THAT ON THE RECORD.

27 MR. KLEIN: WHY DON'T YOU LET HIM SAY IT IS A BLATANT
28 LIE.

1 THE COURT: I ASSUME YOU WERE PRESENT AT ALL
2 PERTINENT TIMES.

3 MR. MIDDLETON: BETWEEN THEM, I DON'T KNOW.

4 FIRST OF ALL, THE WITNESS IS A WITNESS THAT WAS
5 CONTACTED BY THEIR REPRESENTATIVE, TIMOTHY CONNOR, THAT
6 WORKS FOR THE CHURCH AND HE ASKED HER TO TESTIFY. THEY
7 SPENT AN HOUR AND A HALF PHONE CONVERSATION WHEREIN SHE TOLD
8 HIM WHAT IT WAS SHE WOULD TESTIFY TO AND THEN HE DECIDED HE
9 DID NOT WANT TO USE HER AT THAT POINT.

10 THERE WAS A PHONE CONVERSATION BETWEEN HER AND
11 RANDALL KING. RANDALL KING CONTACTED US AND SAID THAT THERE
12 IS THIS WITNESS THAT THEY HAVE CONTACTED. SHE DOES NOT KNOW
13 WHETHER SHE WILL TESTIFY FOR US OR NOT. SHE HAS NOT MADE
14 THAT DECISION.

15 SHE CAME DOWN HERE TODAY. I DID NOT KNOW SHE
16 WAS IN THE COURTROOM. I WENT OUT AFTER LUNCH, MET WITH HER
17 OUT THERE. SHE DID COME IN SLIGHTLY AT TWO O'CLOCK WHEN SHE
18 DECIDED SHE WAS GOING TO TESTIFY. SHE WAS IN NO MORE THAN
19 ONE MINUTE. I WALKED IN AND TOLD HER SHE HAD TO BE
20 EXCLUDED.

21 I TOOK THIS PERSON TO LUNCH. I HEARD WHAT SHE
22 HAD TO SAY. I ASKED HER TO CONSIDER HER DECISION AND SEE IF
23 SHE WOULD TESTIFY. AT THAT POINT SHE HAD NOT MADE UP HER
24 MIND. SHE SAID SHE WOULD LIKE TO CALL UP HER HUSBAND AND
25 TALK TO HIM. THIS IS AT 1:30 TODAY.

26 SHE CALLED HER HUSBAND, COULDN'T GET AHOLD OF
27 HIM BECAUSE HE IS OUT OF TOWN, CAME BACK AND RELAYED THE
28 MESSAGE TO ME THAT SHE HAD DECIDED SHE WOULD TESTIFY AT THAT

1 POINT.

2 BEFORE THAT TIME, I HAD NO KNOWLEDGE CONCERNING
3 WHAT IT IS THAT HER DECISION WAS. AT LUNCH TODAY I FOUND
4 OUT WHAT HER STORY WAS.

5 MR. KLEIN: BUT YOU KNEW SHE WAS COMING.

6 THE COURT: WAIT A MINUTE.

7 MR. MIDDLETON: I DID NOT KNOW.

8 THE COURT: I AM GOING TO TELL YOU SOMETHING. YOU
9 KEEP BARGING IN AND INTERRUPTING. LET SOMEBODY ELSE SAY
10 SOMETHING. THE MORE YOU DO THAT, THE MORE DIFFICULT YOU
11 MAKE IT FOR ME TO RULE IN YOUR FAVOR. FOR YOUR BENEFIT, LET
12 ME TELL YOU. THERE HAVE BEEN A NUMBER OF INSTANCES IN WHICH
13 BECAUSE OF YOUR BARGING IN LIKE THAT, YOU'VE MADE IT
14 DIFFICULT FOR ME TO RULE IN YOUR FAVOR.

15 MR. KLEIN: YES, YOUR HONOR. I AM SORRY.

16 THE COURT: NOW I AM CONCERNED ABOUT THIS. WHY DON'T
17 YOU LET ME ASK A QUESTION OR TWO THAT CONCERNS ME.

18 MR. KLEIN: I AM SORRY.

19 THE COURT: AND GIVE ME A CHANCE POSSIBLY TO RULE IN
20 YOUR FAVOR.

21 MR. KLEIN: YES, YOUR HONOR.

22 THE COURT: YOU'VE NEVER BEEN CUT OFF. YOU'VE ALWAYS
23 HAD A CHANCE, YOU'VE HAD MORE THAN FAIR OPPORTUNITY TO
24 SPEAK. DON'T ABUSE IT.

25 MR. KLEIN: I AM NOT COMPLAINING.

26 THE COURT: ALL RIGHT. NOW, MY QUESTIONS, I HAVE A
27 COUPLE, SO THAT I UNDERSTAND WHAT WE ARE TALKING ABOUT.

28 NUMBER ONE, HAVE YOU THOUGHT SERIOUSLY ABOUT

1 WHETHER HER TESTIMONY, IF SHE IS PERMITTED TO TESTIFY, WOULD
2 BE CUMULATIVE OR WOULD IT ACTUALLY ADD ANYTHING TO THE
3 TRIAL? BECAUSE WE HAVE HAD A LOT OF WITNESSES AND SOME OF
4 THEM HAVE TESTIFIED ABOUT THE SAME THINGS. AND
5 UNDERSTANDABLY SO BECAUSE THERE ARE FACTUAL ISSUES. SO SOME
6 REDUNDANCY IS NOT OUT OF LINE.

7 BUT THERE COMES A POINT BEYOND WHICH FURTHER
8 REDUNDANCY IS UNDESIRABLE AND INAPPROPRIATE. I DON'T KNOW
9 WHAT THIS PERSON PLANS TO TESTIFY ABOUT AND I AM NOT ASKING
10 YOU TO GO DOWN YOUR LAUNDRY LIST RIGHT NOW.

11 MR. MIDDLETON: THIS IS THE EXTENT OF THE LIST.

12 THE COURT: I WILL ASK YOU AS A PROFESSIONAL, WOULD
13 HER TESTIMONY ADD ANYTHING TO THE TRIAL IF SHE IS PERMITTED
14 TO TESTIFY?

15 MR. MIDDLETON: IN MY ESTIMATION, YES, BECAUSE SHE
16 WAS A TEACHER THERE AT SUMMIT UNIVERSITY FROM THE YEAR '73
17 TO '78, DURING THE TIME THAT GREGORY MULL WAS THERE. SHE IS
18 WELL-AWARE OF THE TEACHINGS.

19 THERE HAS BEEN TREMENDOUS AMOUNT OF TESTIMONY
20 FROM THE OTHER SIDE CONCERNING NO BLACKMAIL, SPIRITUAL
21 SUICIDE OR THAT TYPE OF THING EVER GOING ON WITHIN THE
22 CHURCH. SHE PERSONALLY HAD THAT DONE TO HER AND THE MAN
23 THAT SHE WAS WITH.

24 THE COURT: WAS SHE THERE WHEN GREGORY MULL WAS
25 THERE?

26 MR. MIDDLETON: SHE WAS THERE '73 TO '78. SHE WAS
27 THERE IN 1975 AND TAUGHT HIM AT SUMMIT UNIVERSITY.

28 THE COURT: OKAY.

1 MR. MIDDLETON: SHE HAS PERSONAL KNOWLEDGE OF CERTAIN
2 THINGS THAT WE HAVE HAD NO INDEPENDENT WITNESSES TO BE ABLE
3 TO CONTRADICT. THEIR WHOLE CHURCH -- SHE ALSO HAS THE
4 TEACHING CONCERNING THE FORCES OF LIGHT AND DARKNESS, THAT
5 THEY HAVE BEEN ADAMANT TO AVOID SAYING THEY WOULD NEVER COME
6 IN HERE AND LIE. SHE HAS THE UNDERSTANDING OF WHAT THEY ARE
7 TAUGHT EN MASSE THERE.

8 THE COURT: NOW LET ME ASK YOU THIS QUESTION.

9 MR. MIDDLETON: AND THERE IS ALSO CONTRADICTORY
10 EVIDENCE CONCERNING THE MOVIES, THE TV, THE NEWSPAPER. I
11 GRANT YOU SOME OF THAT MAY BE CUMULATIVE, BUT SHE WAS A
12 PERSON THERE AT THE TIME.

13 THEY BROUGHT SO MANY PEOPLE IN THAT WERE THERE
14 SUPPOSEDLY THAT NONE OF THIS EVER HAPPENED WITH. SHE IS
15 INDEPENDENT. SHE HAS SOME THINGS TO SAY FOR THEIR SIDE AND
16 SHE IS FRANK TO SAY THAT.

17 SHE IS NOT IN LOVE WITH GREGORY MULL. BUT SHE
18 HAS BEEN -- IT HAS BEEN MISREPRESENTED TO HER WHAT THIS CASE
19 IS ABOUT. SHE'S FOUND OUT ABOUT IT TODAY. SIMPLE
20 REPRESENTATION SUCH AS SHE NEVER KNEW ELIZABETH SUED
21 GREGORY. SHE'S ALWAYS BEEN TOLD THAT IT WAS GREGORY THAT
22 SUED THE CHURCH.

23 SHE HAS BEEN PRIMED BY THEM. AND THE MAN THAT
24 CALLED HER TOLD HER THAT THE CHURCH WAS IN TROUBLE AND COULD
25 POSSIBLY GO OUT OF EXISTENCE IF A \$30,000,000 JUDGMENT WAS
26 ENTERED AGAINST THEM AND THEY NEEDED HER TESTIMONY TO SAVE
27 THE CHURCH. THAT IS WHAT HE CALLED HER ON.

28 THE COURT: LET ME ASK YOU THIS QUESTION. SHE WAS IN

1 THE COURTROOM THIS AFTERNOON FOR ABOUT A FEW MINUTES.

2 MR. MIDDLETON: A MINUTE AT MOST. SHE WALKED IN. I
3 WALKED IN ALMOST IN BACK OF HER --

4 THE COURT: I SAW YOU DO THAT. I JUST HAPPENED TO
5 NOTICE THAT YOU DID.

6 MY NEXT QUESTION, HOW LONG WAS SHE INSIDE THE
7 COURTROOM THIS MORNING?

8 MR. MIDDLETON: I HAVE NO IDEA. I DIDN'T EVEN KNOW
9 SHE WAS THERE. I DON'T KNOW WHAT --

10 THE COURT: THIS MORNING SHE COULD HAVE HEARD AN
11 INTERESTING DISCUSSION ABOUT HYPNOSIS AND HYPNOTIC THERAPY.

12 MR. KLEIN: ELIZABETH CLARE PROPHET TESTIFIED THIS
13 MORNING. I AM TOLD SHE WAS THERE THE SECOND HALF OF THE
14 MORNING SESSION.

15 THE COURT: ELIZABETH CLARE PROPHET TESTIFIED --

16 MR. LEVY: TO HER LIBRARY.

17 THE COURT: -- BRIEFLY THIS MORNING.

18 MR. MIDDLETON: TO HER LIBRARY, TO GREGORY MULL'S
19 HOMOSEXUALITY. THIS WOMAN IS NOT HERE TO TESTIFY ABOUT
20 THAT.

21 THE COURT: SHE TALKED ABOUT THE LIBRARY, SHE TALKED
22 ABOUT THE BOOKS THAT WERE BOUND IN FOIL, SHE TALKED ABOUT
23 HOMOSEXUALITY.

24 MR. KLEIN: WITH ALL DUE RESPECT, THOUGH, WE DIDN'T
25 MAKE THE RULE AND SAY IT WILL ONLY BE IF THE TESTIMONY IS OF
26 A CERTAIN KIND. WE SAID NO ONE WAS GOING TO BE IN THERE
27 DURING THE OTHER PERSON'S CASE IF THEY WERE GOING TO
28 TESTIFY.

1 MR. LEVY: MAY I INTERJECT FOR JUST ONE THING? MR.
2 MIDDLETON AND I DID NOT KNOW WHO THE LADY --

3 THE COURT: I DIDN'T HEAR YOU.

4 MR. LEVY: I SAID MR. MIDDLETON AND I HAD NO IDEA WHO
5 THIS PERSON WAS THIS MORNING AND WHAT SHE DID HEAR IS NOT
6 WHAT SHE WILL TESTIFY WITH REGARD TO. THAT LITTLE BIT, IF
7 SHE WAS HERE THIS MORNING -- I -- TO THIS POINT I DON'T KNOW
8 WHO SHE IS. I HAVE NOT MET HER. I HAVE NOT SPOKEN TO HER.

9 IF SHE WAS HERE THIS MORNING, SHE HEARD, AS YOU
10 SAY, ABOUT HYPNOSIS, SHE HEARD A LITTLE BIT ABOUT BOOKS IN
11 THE LIBRARY AND THAT IS ALL SHE COULD HAVE HEARD. AND SHE
12 IS NOT GOING TO TESTIFY ABOUT HYPNOSIS OR BOOKS IN THE
13 LIBRARY.

14 THE COURT: CAN SHE BE HERE TOMORROW?

15 MR. LEVY: APPARENTLY NO.

16 MR. MIDDLETON: SHE HAS A PROBLEM WITH THAT. SHE
17 LIVES IN MOUNT SHASTA. THAT IS ONE OF HER QUESTIONS THAT
18 SHE ASKED ME IS, YOU KNOW, "IF I TESTIFY, AM I GOING TO HAVE
19 TO BE HERE TOMORROW?" SHE IS PLANNING ON DRIVING BACK.

20 THE COURT: WHERE IS THAT?

21 MR. MIDDLETON: TEN HOURS.

22 THE COURT: UP IN NORTHERN CALIFORNIA NEAR SHASTA?

23 MR. MIDDLETON: YES.

24 THE COURT: I KNOW WHERE THAT IS. THAT IS VERY FAR
25 FROM HERE. THAT SHASTA?

26 MR. MIDDLETON: THAT SHASTA, RIGHT. THE ONLY THING
27 THAT CONCERNS ME ABOUT THIS IS THEY CONTACTED HER FIRST.
28 THEY ARE OUT HUNTING FOR WITNESSES. AND IF THEY DON'T GET A

1 WITNESS WHO IS GOING TO SAY WHAT THEY WANT, THAT'S IT. AND
2 THEY HAVE GOT THIS THING CALLED A PHONE TREE. THEY CAN
3 CONTACT 100,000 PEOPLE IN 24 HOURS.

4 MR. KLEIN: I CAN STATE FOR THE RECORD --

5 THE COURT: WE HAVE HAD SOME EXPERIENCE WITH
6 TELEPHONE TREES.

7 MR. KLEIN: I CAN STATE FOR THE RECORD I HAVE NEVER
8 HEARD OF THIS WOMAN UNTIL TODAY. THERE IS NO WAY -- IT IS
9 NOT FAIR FOR ME TO BE PUT IN A SITUATION WHERE I HAVE GOT TO
10 CROSS-EXAMINE HER. I HAVE NEVER HEARD HER NAME UNTIL JUST
11 NOW.

12 THE COURT: SHE WAS CONTACTED BY THE CHURCH.

13 MR. MIDDLETON: TIMOTHY CONNOR. YOU HAVE HEARD OF
14 TIMOTHY CONNOR?

15 MR. KLEIN: OH, YES. WHEN DID HE CONTACT HER?

16 MR. MIDDLETON: BEATS ME. WE FOUND OUT ABOUT IT ON
17 SUNDAY.

18 THE COURT: SUNDAY MEANING YESTERDAY?

19 MR. MIDDLETON: THAT'S RIGHT.

20 MR. KLEIN: I HAVE NO IDEA WHEN HE CONTACTED HER.
21 THE POINT IS --

22 MR. MIDDLETON: IT'S BEEN SINCE THE TRIAL STARTED.

23 MR. KLEIN: I CAN'T SAY ONE WAY OR THE OTHER.

24 THE COURT: WAIT A MINUTE. ONE PERSON AT A TIME.
25 YOU WILL HAVE A CHANCE IN A SECOND, I PROMISE YOU THAT.

26 MR. MIDDLETON: I WILL ASK HER THE DATE IF THE COURT
27 SO CHOOSES. I DO HAVE THE IMPRESSION THAT HE CONTACTED HER
28 AFTER THE PERIOD OF TIME THAT SHE GOT DOWN HERE.

1 THE COURT: BY TELEPHONE?

2 MR. MIDDLETON: YES. IT IS A TELEPHONE CONVERSATION,
3 AN HOUR AND A HALF PHONE CONVERSATION.

4 THE COURT: WHAT DID YOU WANT TO SAY?

5 MR. KLEIN: MY POINT IS THIS: ONE OF THE WAYS THAT
6 WE PREPARE TO CROSS-EXAMINE PEOPLE, I GO BACK AND TALK TO
7 THE PEOPLE WHO KNEW THAT PERSON. I LOOK TO SEE IF THERE ARE
8 ANY DOCUMENTS OR LETTERS RELATING TO THAT PERSON. I AM
9 TOTALLY DEPRIVED OF DOING THAT IF THIS PERSON TESTIFIES
10 TODAY.

11 THE COURT: YOU KNOW SOMETHING --

12 MR. MIDDLETON: YOUR HONOR --

13 THE COURT: YEARS AGO, WE DIDN'T HAVE THE DISCOVERY
14 RULES. LIFE WAS SIMPLER THEN. AND IN SOME RESPECTS,
15 LITIGATION WAS MORE SATISFACTORY WITHOUT ALL OF THESE
16 ELABORATE DISCOVERY RULES, WHICH ARE OVERDONE ANYWAY IN MY
17 NOT VERY HUMBLE OPINION. BUT WE DO HAVE THEM.

18 MR. MIDDLETON: THERE IS AN ADDED FACTOR, IS THOSE
19 PEOPLE SITTING RIGHT AT THE COUNSEL TABLE HAVE KNOWN HER FOR
20 FIVE YEARS. I HAVE KNOWN HER EXACTLY ABOUT TWO HOURS AT
21 THIS POINT. I SPENT AN HOUR --

22 THE COURT: I AM READY TO RULE.

23 MR. KLEIN: CAN I MAKE ONE POINT?

24 THE COURT: YES, SIR.

25 MR. KLEIN: MY POINT IS SIMPLY THIS: THIS LADY DID
26 NOT JUST WALK INTO THIS COURTHOUSE. SOMEBODY HAD TO TELL
27 HER TO COME HERE. AT SOME POINT BEFORE TODAY, SOMEBODY
28 SAID, "COME DOWN HERE AND WE WILL TALK TO YOU."

1 MY ARGUMENT IS THAT AT THAT POINT, THEY SHOULD
2 HAVE SAID TO ME, "WE MIGHT BE PUTTING ON THIS WOMAN," SO
3 THAT I HAD AN OPPORTUNITY TO PREPARE. BUT NOBODY SAID IT
4 AND THAT IS WHAT MY PROBLEM IS. THEY COULD HAVE TOLD ME.
5 THEY HAD TO KNOW SHE WAS GOING TO BE HERE.

6 MR. LEVY: WHERE DOES IT SAY WE HAVE TO KNOW --

7 MR. KLEIN: AT SOME POINT, SOMEBODY HAD TO TELL HER,
8 "COME TO THE FIFTH FLOOR OF THIS BUILDING." IT HAD TO BE
9 BEFORE TODAY.

10 MR. MIDDLETON: THAT IS NOT TRUE.

11 THE COURT: THIS ISN'T A DIFFICULT PLACE TO FIND.

12 MR. MIDDLETON: THAT IS NOT TRUE AND NO ONE TOLD HER
13 TO COME. WE WERE TOLD THAT SHE MIGHT SHOW UP AND BE HERE OF
14 HER OWN VOLITION. AND THAT WAS YESTERDAY AFTERNOON.

15 WE DID NOT DID NOT -- AND I WAS SUPPOSED TO
16 MEET HER FOR LUNCH, AND I SAT HERE READING LETTERS AND
17 DIDN'T EVEN KNOW. I SAT HERE FOR A HALF HOUR WITH KATHLEEN
18 AND I SAT HERE READING LETTERS. WHEN I STEPPED OUT IN THE
19 HALL, I WAS INTRODUCED TO HER. I HAD COMPLETELY FORGOTTEN
20 ABOUT HER.

21 THE COURT: YOU REST AT THIS POINT?

22 MR. KLEIN: I AM GOING TO PUT IN ONE THING. I WANT
23 TO ASK THE COURT TO TAKE JUDICIAL --

24 THE COURT: WHY DON'T YOU DO IT NOW.

25 MR. KLEIN: I WOULD ASK THE COURT TO TAKE JUDICIAL
26 NOTICE AND RECEIVE AS EVIDENCE A COPY OF THE HOLY BIBLE.

27 THE COURT: WHICH VERSION?

28 MR. KLEIN: THE KING JAMES VERSION. I WILL BRING THE

1 COPY IN.

2 THE COURT: I UNDERSTAND THAT THERE ARE REVISED KING
3 JAMES VERSIONS, TOO.

4 MR. KLEIN: CAN I GET THE COPY THAT I WANT TO BRING
5 IN? I DON'T THINK THAT THERE IS ANYTHING UNUSUAL ABOUT IT,
6 BUT I WOULD LIKE IT TO BE RECEIVED IN EVIDENCE.

7 THE COURT: IF YOU WILL BE SPECIFIC ABOUT IT, I DON'T
8 THINK YOU WILL HAVE A PROBLEM.

9 MR. KLEIN: I WILL GET IT RIGHT NOW.

10 THE COURT: LISTEN, LET ME TELL YOU -- ALL RIGHT.
11 WHY DON'T YOU GO GET IT AND BRING IT IN. I REALLY WANT TO
12 PROCEED.

13 IS THIS THE VOLUME THAT YOU WANT? THERE ARE
14 VARIOUS -- HERE RED LETTER DICTIONARY, THERE IS DEUTERONOMY,
15 ALL RIGHT. MARK, LUKE, ALL RIGHT. WE ARE IN THE NEW
16 TESTAMENT. WE ARE IN THE NEW TESTAMENT. COPYRIGHT 1972.
17 DO YOU WANT TO HAVE THIS RECEIVED IN EVIDENCE?

18 MR. KLEIN: YES.

19 THE COURT: AS -- WHAT IS THE NEXT NUMBER? NUMBER
20 125.

21 MR. LEVY: NO OBJECTION, YOUR HONOR.

22 THE COURT: IT'S RECEIVED.

23 (MARKED AND REC'D IN EVID: ^ EXHIBIT 125, BIBLE)

24 THE COURT: YOU DO IT RIGHT, SEE HOW EASY IT IS?

25 MR. KLEIN: YES, YOUR HONOR.

26 THE COURT: IF YOU MAKE IT DIFFICULT, THEN YOU MAKE
27 IT DIFFICULT. IF YOU DO IT RIGHT, YOU ARE SELDOM
28 DISAPPOINTED.

1 MR. KLEIN: I APPRECIATE THAT.

2 MR. LEVY: OFF THE RECORD, KATHLEEN.

3 (DISCUSSION OFF THE RECORD.)

4 THE COURT: LET'S GO BACK ON THE RECORD.

5 I AM READY TO RULE.

6 I THINK UNDER ALL THE CIRCUMSTANCES, AND
7 PARTICULARLY GIVEN THE FACT THAT APPARENTLY THE PROPOSED
8 WITNESS WAS NOT IN THE COURTROOM WHEN THINGS WERE GOING ON
9 THAT WOULD PERTAIN TO HER TESTIMONY -- AND I ACCEPT
10 COUNSELS' REPRESENTATIONS THAT THEY DID NOT KNOW THAT SHE
11 WOULD BE HERE OR THAT SHE WOULD BE WILLING TO TESTIFY -- AND
12 FURTHER THAT MRS. FRANCIS AND OTHER MEMBERS OF THE
13 LEADERSHIP OF THE CHURCH HAVE KNOWN THIS PERSON FOR A LONG
14 TIME, I THINK IT WOULD BE -- IN ALL OF THESE CIRCUMSTANCES,
15 I THINK IT WOULD BE AN ABUSE OF DISCRETION TO PROHIBIT HER
16 FROM TESTIFYING.

17 SO I ASSUME NOW THAT YOU REST, MR. KLEIN, NOW
18 THAT YOUR BIBLE IS RECEIVED IN EVIDENCE?

19 MR. KLEIN: I REST, YOUR HONOR.

20 THE COURT: OKAY. ALL RIGHT. SO WE WILL RESUME IN A
21 FEW MOMENTS. TAKE A QUICK RECESS.

22 (RECESS.)

23 (THE PROCEEDINGS WERE RESUMED IN OPEN
24 COURT IN THE PRESENCE OF THE JURY:)

25 THE COURT: PLEASE PROCEED.

26 MR. MIDDLETON: YOUR HONOR, WE WOULD CALL TO THE
27 STAND LAURA-LEA CANNON AS OUR FIRST REBUTTAL WITNESS.

28 ///

1 Q AND WHEN DID YOU FIRST HAVE CONTACT WITH THE
2 CHURCH?

3 A I BELIEVE IT WAS IN 1973.

4 Q AND WOULD YOU TELL US BRIEFLY THAT CONTACT AND
5 WHAT HAPPENED?

6 A I WAS IN ATTENDANCE AT ONE OF THE CONFERENCES
7 IN COLORADO SPRINGS AND THE NATURE OF MY EXPERIENCE THERE
8 LED ME TO PURSUE FURTHER CONNECTION WITH THE CHURCH.

9 Q DID YOU PURSUE FURTHER CONNECTIONS WITH THE
10 CHURCH?

11 A YES, I DID. I GOT INVOLVED WITH THE UNIVERSITY
12 AND WENT ON TO BECOME STAFF MEMBER.

13 Q THE UNIVERSITY, IS THAT SUMMIT UNIVERSITY?

14 A CORRECT.

15 Q WHEN YOU BECAME A STAFF MEMBER, WHAT ROLE DID
16 YOU HAVE AS A STAFF MEMBER?

17 A SEVERAL. I STARTED OUT AS A TEACHING ASSISTANT
18 AT SUMMIT UNIVERSITY. I HAD SOME RESPONSIBILITIES WITH
19 ELIZABETH'S HOUSEHOLD AND CHILDREN. AND THEN WENT ON TO
20 BECOME AN INSTRUCTOR AT THE UNIVERSITY AND PRODUCED
21 MULTIMEDIA SHOWS.

22 Q YOU WERE AN INSTRUCTOR AT SUMMIT UNIVERSITY?

23 A CORRECT.

24 Q YOU ALSO PRODUCED WHAT YOU CALLED MULTIMEDIA
25 SHOWS?

26 A UH-HUH.

27 Q YOU ACTUALLY HAD TWO POSITIONS THAT YOU FILLED
28 THERE?

1 A RIGHT.

2 Q AS AN INSTRUCTOR, DID YOU BECOME FAMILIAR WITH
3 THE TEACHINGS OF THE CHURCH?

4 A YES.

5 Q ARE YOU FAMILIAR WITH THE TEACHINGS CONCERNING
6 THE GREAT WHORE?

7 A YES.

8 Q IS THAT A TEACHING WITHIN THE CHURCH?

9 A I -- I HAVE TO SAY I AM A LITTLE FOGGY ON MY
10 RECOLLECTION OF IT. MY RECOLLECTION OF THAT TEACHING IS
11 THAT IT WAS BASICALLY A PERVERSION OF THE ENERGY OF THE
12 DIVINE MOTHER.

13 Q OKAY. AND THEN THERE WAS A TEACHING CONCERNING
14 THE BEAST OF BLASPHEMY?

15 A AGAIN, A TERM THAT I DIDN'T HAVE THAT MUCH
16 DIRECT EXPERIENCE WITH.

17 Q THERE IT WAS A TEACHING WITHIN THE CHURCH?

18 A I BELIEVE SO.

19 Q AND ARE YOU FAMILIAR WITH THE CLOCK OF
20 BETRAYAL?

21 A AGAIN, I HAVE NEVER QUITE HEARD IT CALLED THAT,
22 BUT I CERTAINLY UNDERSTAND THE TEACHINGS OF THE CLOCK AND --

23 Q WHAT HAVE YOU HEARD IT CALLED?

24 A WELL, THE COSMIC CLOCK IS WHAT THE TEACHING
25 WAS. AND THERE WERE POSITIONS ON THE CLOCK THAT WERE
26 ASSIGNED IN VARIOUS INSTANCES TO VARIOUS SITUATIONS.

27 AND THE CLOCK OF BETRAYAL IS SOMETHING I THINK
28 I PROBABLY HEARD MORE AFTER THE FACT. I HONESTLY DON'T

1 RECALL IT AS A CONCEPT WHEN I WAS A STAFF MEMBER.

2 Q WAS THAT AFTER YOU HAD LEFT?

3 A YES. I MEAN WE DID CERTAIN DECREES INVOLVING
4 THE CLOCK, BUT THAT TERM IS NOT ONE I AM FAMILIAR WITH.

5 Q AND YOU KNOW THE VARIOUS AXES ON THE CLOCK?

6 A YES, I DO.

7 Q YOU KNOW WHAT THE TEN-FOUR AXIS IS?

8 A UH-HUH.

9 Q YOU KNOW WHAT IT REPRESENTS?

10 MR. KLEIN: I WOULD OBJECT, YOUR HONOR. IF THE
11 WITNESS LEARNED THIS AFTER SHE LEFT THE CHURCH, I THINK
12 THERE IS NO FOUNDATION FOR THESE QUESTIONS.

13 THE COURT: SHE CAN ANSWER.

14 THE WITNESS: THE TEN-FOUR AXIS WAS BASICALLY THE
15 SCORPIO ENERGY AND IT WAS A PERVERSION OF THE VISION,
16 TEN-FOUR AXIS BEING RELATED TO THE THIRD EYE AXIS.

17 Q BY MR. MIDDLETON: WHAT CONNECTION DID YOU HAVE
18 WITH MULTIMEDIA PRODUCTIONS?

19 A WELL, WE CREATED PROGRAMS THAT WERE USED TO
20 SUPPORT THE TEACHING OF THE CHURCH, THAT TRAVELED WITH THE
21 CARAVANS, THE STUMP TOURS THAT WOULD GO AROUND THE COUNTRY
22 AND ALSO THAT WERE USED IN CONFERENCES TO SUPPORT ELIZABETH
23 AND THE DICTATIONS AND MEDITATIONS, THAT KIND OF THING. WE
24 ALSO DID A PROGRAM ABOUT THE CHURCH.

25 Q ALL RIGHT. AND WHO DID YOU WORK IN MULTIMEDIA
26 PRODUCTIONS WITH?

27 A PRIMARILY WITH RANDALL AND A MAN NAMED ALAN
28 KOZLOWSKI.

1 Q ALAN KOZLOWSKI?

2 A UH-HUH.

3 Q WAS THERE A TIME THAT YOU WANTED TO MARRY ONE
4 OF THE PARTIES?

5 A YES.

6 Q AND WHO WAS THAT?

7 A ALAN.

8 Q AND WHAT DID YOU HAVE TO DO TO MARRY ALAN?

9 A WELL, WHATEVER IT WAS, I NEVER FOUND OUT. I --
10 I HAD REQUESTED -- WE BOTH HAD REQUESTED PERMISSION TO BE
11 MARRIED.

12 Q AND YOU REQUESTED PERMISSION FROM WHO?

13 A FROM ELIZABETH.

14 Q AND WAS IT NECESSARY TO REQUEST PERMISSION FROM
15 ELIZABETH?

16 A IN OUR CASE IT WAS. YES.

17 Q YOU SAY IN YOUR CASE, IT WAS. WHY IS THAT? IS
18 THAT BECAUSE YOU WERE ON PERMANENT STAFF?

19 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR.
20 LEADING THE WITNESS.

21 THE COURT: SUSTAINED.

22 Q BY MR. MIDDLETON: WHY IS IT THAT IT WAS
23 NECESSARY FOR YOU TO REQUEST PERMISSION TO GET MARRIED?

24 A WELL, I BELIEVE IT WAS BECAUSE OF OUR POSITION
25 ON THE STAFF, AND OUR ASSOCIATION WITH -- WITH THE CHURCH
26 AND WHO WE WERE IN THE CONTEXT OF THE CHURCH.

27 Q THERE IS NO QUESTION IN YOUR MIND THAT YOU HAD
28 TO ASK PERMISSION?

1 A NONE.

2 Q IT WAS ABSOLUTELY CERTAIN TO YOU. DID YOU ASK
3 FOR PERMISSION?

4 A YES, SEVERAL TIMES.

5 Q SEVERAL TIMES. WERE YOU ALLOWED TO GET
6 MARRIED?

7 A NO, I WAS NOT.

8 Q WAS THIS CREATING CONFLICT WITH YOU AT THE
9 TIME?

10 A TREMENDOUS.

11 Q WHAT KIND OF CONFLICT WAS IT CREATING WITH YOU?

12 A WELL, I WAS WORKING WITH A MAN WHO I WAS AT THE
13 TIME VERY MUCH IN LOVE WITH AND VERY DRAWN TO. AND BECAUSE
14 OF ALSO THE CODE THAT I HAD AGREED TO LIVE BY, I FOUND
15 MYSELF IN VIOLATION OF THAT CODE BECAUSE I WAS VERY MUCH
16 ATTRACTED TO HIM AND WANTED TO SORT OF MAKE IT ALL OKAY BY
17 BEING MARRIED RATHER THAN FEELING A PHYSICAL ATTRACTION THAT
18 COULDN'T BE EXPERIENCED BY US.

19 Q DID YOU DISCUSS THIS CONFLICT THAT YOU HAD WITH
20 ELIZABETH?

21 A YES, I DID.

22 Q AND ON MORE THAN ONE OCCASION?

23 A I'M SURE, YES.

24 Q WERE YOU EXPERIENCING ANY TYPE OF FEELINGS
25 WHILE THIS CONFLICT WAS GOING ON?

26 A I WAS EXTREMELY TORN.

27 Q THERE CAME A TIME THAT -- I AM SORRY.

28 THE RESULT OF NOT BEING ALLOWED TO MARRY, WHAT

1 WAS THE RESULT OF THAT WITH REGARD TO YOUR POSITION WITH THE
2 CHURCH?

3 A WELL, I'D SAY EVENTUALLY IT PRECIPITATED MY
4 LEAVING.

5 Q AND SO YOU LEFT THE CHURCH?

6 A YES, I DID.

7 Q AND HOW ABOUT MR. KOZLOWSKI?

8 A HE HAD LEFT ABOUT SIX MONTHS EARLIER.

9 Q ALL RIGHT. AND WHAT WERE YOUR EXPERIENCES UPON
10 LEAVING THE CHURCH? SPECIFICALLY, DID YOU HAVE ANY CONTACT
11 WITH ELIZABETH CLARE PROPHET AT THE POINT OF LEAVING THE
12 CHURCH?

13 A I -- I DID LET HER KNOW THAT I WAS LEAVING AND
14 NEEDED TO LEAVE AND INITIALLY WAS GIVEN HER BLESSING IN
15 LEAVING. AND IT WAS FOLLOWED BY SEVERAL WRITTEN
16 COMMUNICATIONS AND APPARENTLY BY A DICTATION THAT WAS ALSO
17 MAILED TO US ANONYMOUSLY IN WHICH SHE INDICATED THAT MYSELF
18 AND ALAN HAD FAILED THE MAJOR INITIATION.

19 Q WHAT WAS THAT MAJOR INITIATION?

20 A FOR ME IT WAS THAT MY -- BASICALLY MY WHOLE
21 LIFE WAS BUILDING UP TO MAKING A CHOICE BETWEEN MY
22 COMMITMENT TO SPIRIT AND MY -- IN A SENSE MY CARNAL DESIRES
23 IN WANTING TO BE MARRIED TO THIS MAN. AND THAT HE WAS A
24 SYMBOL OF SOMETHING WHICH HE WAS CALLED THE IMPOSTOR, THE
25 IMPOSTOR OF MY TWIN FLAME AND THAT IS WHY I WAS SO ATTRACTED
26 AND DRAWN INTO MY RELATIONSHIP WITH HIM.

27 AND BY CHOOSING TO LEAVE THE CHURCH, I HAD
28 BASICALLY FAILED THE INITIATION AND CHOSEN NOT SPIRIT AND

1 THE MOTHER FLAME, BUT RATHER TO PURSUE MARRIAGE.

2 Q WERE SOME SPECIFIC WORDS USED CONCERNING WHAT
3 THAT IS SPIRITUALLY?

4 A THERE IS ONE LETTER THAT I HAD RECEIVED THAT
5 HAD SAID I HAD COMMITTED SPIRITUAL SUICIDE.

6 Q WERE YOU BEING ASKED TO RETURN TO THE CHURCH?

7 A NO, I DON'T BELIEVE I WAS EVER ASKED TO RETURN.

8 Q THESE WERE COMMUNICATIONS SENT TO YOU THAT JUST
9 SAID YOU COMMITTED SPIRITUAL SUICIDE WAS THE END EFFECT OF
10 THOSE?

11 A WELL, IT WAS A LENGTHY EXPLANATION OF HOW THE
12 BROTHERHOOD WORKS AND HOW I, AS PART OF THE BROTHERHOOD, HAD
13 BEEN REMOVED FROM THE LINK, MY LINK IN THE CHAIN OF THE
14 BROTHERHOOD HAD BEEN REMOVED.

15 Q AND A DICTATION FROM EL MORYA CAME TO YOU?

16 A THAT'S CORRECT.

17 Q CONCERNING YOUR TWIN FLAME?

18 A CORRECT.

19 Q AND THAT YOU HAD FAILED YOUR TWIN FLAME?

20 MR. KLEIN: YOUR HONOR, IT IS VERY LEADING AT THIS
21 POINT. I WOULD OBJECT.

22 THE COURT: WHAT?

23 MR. KLEIN: THE QUESTIONS ARE LEADING. I WOULD
24 OBJECT.

25 THE WITNESS: WELL, I CAN EXPLAIN

26 THE COURT: JUST STATE THE GROUNDS FOR THE OBJECTION
27 THAT IS ALL.

28 MR. KLEIN: LEADING.

1 THE COURT: SUSTAINED.

2 Q BY MR. MIDDLETON: WOULD YOU EXPLAIN THE
3 DICTATION FROM EL MORYA?

4 A THE EXPLANATION WAS THAT I HAD A TWIN FLAME WHO
5 WAS AN ASCENDED BEING, THAT HE WAS NEWLY ASCENDED AND THAT
6 THEREFORE DID NOT HAVE A GREAT DEAL OF ATTAINMENT. AND THAT
7 THE BALANCE OF HIS ATTAINMENT WAS PLACED BEFORE THE LORDS OF
8 KARMA IN ORDER TO ALLOW OR ENCOURAGE ME TO STAY IN SERVICE
9 TO THE CHURCH.

10 AND WHEN I MADE THE DECISION TO LEAVE THE
11 CHURCH, IT WAS SAID THAT HE BASICALLY HAD BEEN RETURNED TO
12 THE CENTRAL SUN OR CONSUMED IN FLAME. AND THAT IT WAS
13 BECAUSE OF MY BEHAVIOR AND THAT I HAD BASICALLY BETRAYED THE
14 BROTHERHOOD.

15 Q WE HAVE HAD A GOOD DEAL OF TESTIMONY HERE
16 CONCERNING MOVIES, TV, NEWSPAPERS AND THE FACT THAT THEY ARE
17 ALLOWED FREELY AT THE CAMPUS AT CAMELOT OR AT SUMMIT
18 UNIVERSITY OR FOR ANYONE THAT WAS A PART OF THE CHURCH.

19 AND I AM GOING TO ASK YOU WHAT WAS THE LAW OR
20 THE RULE AT THE TIME THAT YOU WERE THERE CONCERNING MOVIES,
21 TV AND NEWSPAPERS?

22 MR. KLEIN: YOUR HONOR, IT IS VAGUE AND AMBIGUOUS AS
23 TO WHERE "THERE" IS AS OPPOSED TO CAMELOT, SUMMIT
24 UNIVERSITY, WHAT SITE WE ARE TALKING ABOUT.

25 THE COURT: WHY DON'T YOU REPHRASE THE QUESTION.

26 Q BY MR. MIDDLETON: WHILE YOU WERE AT SUMMIT
27 UNIVERSITY AS A TEACHER, WHAT WAS THE RULES CONCERNING
28 MOVIES, TV'S AND NEWSPAPERS?

1 A I RECALL ON SEVERAL OCCASIONS I SNUCK OUT TO
2 SEE MOVIES AND I BELIEVE ALSO ON SEVERAL OCCASIONS I WENT
3 WITH OTHER STAFF AND STUDENTS TO SEE MOVIES. IT WASN'T --
4 DEFINITELY WASN'T OKAY ALL THE TIME TO SEE CERTAIN KINDS OF
5 MOVIES.

6 Q WHY DID YOU SNEAK OUT?

7 A EITHER DIDN'T HAVE THE PERMISSION NECESSARY TO
8 GO OR, YOU KNOW, JUST WANTED TO GO ON MY OWN, WHATEVER THE
9 CASE MAY BE.

10 Q YOU SAID SOMETHING ABOUT CERTAIN KINDS OF
11 MOVIES WEREN'T OKAY. WAS THERE A BLACKLIST ON CERTAIN
12 MOVIES?

13 A I DON'T THINK SO MUCH A BLACKLIST AS JUST THE
14 ENCOURAGEMENT TO SEE MOVIES THAT WERE UPLIFTING AND NOT THAT
15 WOULD BE MORE NEGATIVE IN THEIR INFLUENCE.

16 Q AND YOU HAD TO HAVE PERMISSION TO GO TO MOVIES?
17 MR. KLEIN: I AM GOING TO OBJECT. LEADING, YOUR
18 HONOR.

19 THE COURT: OVERRULED.

20 Q BY MR. MIDDLETON: YOU HAVE TO ANSWER AUDIBLY,
21 I AM SORRY.

22 A THAT'S MY RECOLLECTION.

23 Q WERE NEWSPAPERS READILY AVAILABLE?

24 A NO.

25 Q NOW DURING THE TIME YOU WERE PERMANENT STAFF,
26 WERE NEWSPAPERS READILY AVAILABLE?

27 A NOT TO ME. THEY MAY HAVE BEEN TO SOME PEOPLE,
28 BUT THEY WEREN'T PART OF WHAT I DID.

1 Q THEY WEREN'T WITHIN YOUR SPHERE ANYWAY?

2 A RIGHT.

3 Q AND YOU WERE THERE ON PERMANENT STAFF?

4 A YES.

5 Q HOW MANY HOURS A DAY DID YOU SPEND DEVOTING TO
6 THE CHURCH?

7 A I WOULD SAY IT RANGED BETWEEN 12 TO 20.

8 Q TWELVE TO TWENTY HOURS A DAY. SOMETIMES YOU
9 WORKED AS MANY AS TWENTY HOURS A DAY?

10 A UH-HUH.

11 Q AND GOT ONLY FOUR HOURS SLEEP?

12 A CORRECT.

13 Q WOULD YOU EXPLAIN THE TEACHING ABOUT THE GITA
14 THAT YOU WERE TAUGHT WHILE A MEMBER OF THE CHURCH AND ON
15 PERMANENT STAFF CONCERNING THE FORCES OF LIGHT AND DARKNESS?

16 A THE TEACHINGS FROM THE BHAGAVAD GITA?

17 Q MAY NOT BE EXPRESSING THAT RIGHT.

18 WAS THERE A TEACHING OF THE CHURCH CONCERNING
19 FORCES OF LIGHT AND DARKNESS?

20 A WELL, I THINK THAT IS ONE OF THE MAJOR PREMISES
21 OF THE CHURCH.

22 Q WOULD YOU EXPLAIN THAT MAJOR PREMISE TO US?

23 A MAYBE YOU COULD HELP ME NARROW IT DOWN A LITTLE
24 BIT. THAT IS A LOT OF GROUND TO COVER.

25 Q I'D LIKE YOU TO EXPLAIN IT IN GENERAL TERMS, IF
26 YOU CAN, AND AT THIS MOMENT I DON'T WANT TO PUT IT TO A
27 SPECIFIC INSTANCE.

28 A WELL, MY UNDERSTANDING WAS THAT BASICALLY WE

1 WERE HOLDING A FOCUS OF LIGHT IN THE CONTEXT OF THE CHURCH
2 AND OF THE WORK THAT THE CHURCH DID AS AN INFLUENCE IN
3 PLANETARY STABILITY, AND THAT THERE WERE RAGING FORCES
4 DEPICTED BY A LOT THAT GOES ON IN THIS WORLD IN TERMS OF WAR
5 AND HUNGER AND STARVATION AND DIFFERENT ELEMENTS SEEM TO
6 FALL INTO DIFFERENT CATEGORIES OF BLACK AND WHITE.

7 AND THAT PART OF THE NATURE OF THE CHURCH WAS
8 IN DEFENSE OF THE FORCES OF LIGHT TOWARDS THE UPLIFTMENT OF
9 MANKIND AND ULTIMATELY TO CREATE A FOCUS OF GREATER
10 DIVINITY. AND THAT WAS THE SENSE OF EVERYBODY'S
11 PARTICIPATION AND THAT WAS HELPING TO FURTHER THAT CAUSE.

12 Q AND YOUR CAUSE WAS IT WOULD FURTHER THE CAUSE
13 OF LIGHT?

14 A RIGHT.

15 Q WERE YOU TAUGHT TO DEFEND THE CHURCH FOR THE
16 CAUSE OF LIGHT?

17 A I WOULD HAVE TO SAY YES. I WOULD SAY THAT
18 DEFENSE OF THE CHURCH AND THE MOTHER FLAME WAS PART OF THAT
19 CAUSE.

20 Q WAS PART OF THE CAUSE OF LIGHT?

21 A UH-HUH.

22 Q NOW, I AM GOING TO GIVE YOU A HYPOTHETICAL
23 QUESTION AT THE MOMENT THAT REALLY HAS TO DO IN TERMS OF
24 YOUR OPINION AS TO HOW THE MEMBERS OF THE CHURCH, SINCE YOU
25 WERE ON STAFF AND YOU WERE FAMILIAR WITH THIS TEACHING,
26 WOULD LOOK AT THOSE OF US HERE THAT ARE PARTICIPANTS AT THIS
27 TRIAL, AND HOW THEY WOULD LOOK AT GREGORY MULL IN TERMS OF
28 THE FORCES OF LIGHT AND DARKNESS AND HOW THEY WOULD LOOK AT

1 ELIZABETH HERE IN TERMS OF THE FORCES OF LIGHT AND DARKNESS.

2 MR. KLEIN: YOUR HONOR, BEFORE COUNSEL GIVES HIS
3 HYPOTHETICAL, I WOULD OBJECT. FIRST, IT OBVIOUSLY IS GOING
4 TO CALL FOR SPECULATION AND, SECONDLY, THERE IS A LACK OF
5 FOUNDATION. SHE HASN'T BEEN WITH THIS CHURCH FOR FIVE
6 YEARS.

7 THE COURT: SUSTAINED.

8 THE WITNESS: I WOULD HAVE TO SAY THERE IS A
9 CERTAIN --

10 THE COURT: JUST WAIT A MINUTE, PLEASE.

11 THE WITNESS: I AM SORRY.

12 Q BY MR. MIDDLETON: FROM THE TIME THAT YOU WERE
13 AT THE CHURCH FROM 1973 THROUGH 1978, IF THIS SITUATION
14 AROSE, WOULD YOU LOOK AT MR. MULL AS THE FORCE OF DARKNESS?

15 A YES.

16 Q WOULD YOU LOOK AT ELIZABETH CLARE PROPHET AS A
17 FORCE OF LIGHT?

18 A YES.

19 Q WOULD YOU DEFEND ELIZABETH CLARE PROPHET?

20 A YES.

21 Q TO THE POINT OF LYING?

22 A ME PERSONALLY, NO.

23 Q WOULD OTHERS?

24 MR. KLEIN: I AM GOING TO OBJECT TO THAT, YOUR HONOR.
25 THAT CALLS FOR SPECULATION.

26 THE COURT: SUSTAINED.

27 Q BY MR. MIDDLETON: CONCERNING THE ROLES OF
28 PLAINTIFF AND DEFENDANT HERE, HAVE YOU EVER BEEN EXPLAINED

1 TO BY ANY MEMBER OF THE CHURCH THAT ELIZABETH CLARE PROPHET
2 SUED GREGORY MULL?

3 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCY,
4 YOUR HONOR.

5 THE COURT: OVERRULED.

6 YOU CAN ANSWER.

7 THE WITNESS: I -- I HAD THAT IMPRESSION AND I -- I
8 DON'T KNOW THAT I WAS TOLD THAT BY ANYONE.

9 Q BY MR. MIDDLETON: THAT ELIZABETH SUED GREGORY?

10 A NO, NO. I AM SORRY. THAT GREGORY WAS SUING
11 ELIZABETH.

12 Q THAT GREGORY WAS SUING ELIZABETH, AND THAT IS
13 THE WAY YOU LOOKED AT IT AND THAT IS THE WAY IT WAS
14 EXPLAINED TO YOU, HOWEVER YOU GOT THAT IMPRESSION?

15 A CORRECT.

16 Q DURING THE TIME THAT YOU WERE THERE, THE
17 GENERAL TEACHING CONCERNING THE FORCES OF LIGHT AND
18 DARKNESS, DID THOSE TEACHINGS MAKE IT ALL RIGHT TO LIE TO
19 OUTSIDERS CONCERNING THE PROTECTION OF THE CHURCH?

20 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR, AS TO
21 SPECULATION OTHER THAN WHAT SHE THOUGHT.

22 THE COURT: SHE CAN ANSWER.

23 THE WITNESS: WOULD YOU REPHRASE THE QUESTION?

24 Q BY MR. MIDDLETON: ALL RIGHT. WAS IT ALL RIGHT
25 TO LIE FOR THE GREATER GOOD OF THE CHURCH?

26 A IT IS ACTUALLY DIFFICULT FOR ME TO ANSWER THAT.
27 I THINK I PROBABLY PERSONALLY THOUGHT AND EXPLAINED THINGS
28 ACCORDING TO HOW I FELT, WHICH NOW MY PERSPECTIVE WOULD BE

1 VERY DIFFERENT. SO I WOULDN'T HAVE THOUGHT THAT I WAS LYING
2 AT THE TIME OR MISREPRESENTING ANYTHING BECAUSE OF THE
3 STRUCTURE OF MY BELIEF SYSTEM AT THAT TIME.

4 Q THE STRUCTURE OF YOUR BELIEF SYSTEM WOULD BE TO
5 PROTECT THE GREATER GOOD --

6 MR. KLEIN: I AM GOING TO OBJECT. LEADING, YOUR
7 HONOR.

8 THE WITNESS: YES, DEFINITELY.

9 THE COURT: JUST A SECOND. SUSTAINED.

10 MR. KLEIN: CAN THAT ANSWER BE STRICKEN, YOUR HONOR?

11 THE COURT: ALL RIGHT. THE VERY LAST ANSWER OF THE
12 WITNESS IS STRICKEN.

13 Q BY MR. MIDDLETON: WHAT WAS --

14 THE COURT: THE JURY IS DIRECTED TO DISREGARD IT.

15 Q BY MR. MIDDLETON: WHAT WAS THE STRUCTURE OF
16 YOUR BELIEF SYSTEM?

17 A WELL, I FELT VERY STRONGLY ABOUT MY OWN IDEALS,
18 ABOUT MY DESIRE TO SERVE SPIRIT, TO SERVE THE MOTHER, TO
19 FURTHER THE GOOD ON THE PLANET AND BASICALLY TO DO WHATEVER
20 IT TOOK TO ACCOMPLISH THAT. AND --

21 Q TO THE POINT OF TAKING UP ARMS?

22 A NO, I WOULDN'T. I DON'T THINK I EVER WOULD
23 HAVE. I THINK THERE WAS A PLACE AT THAT POINT OF
24 RECOGNIZING THAT SOME PEOPLE ARE WARRIORS MUCH THE WAY
25 PEOPLE DEFEND THE COUNTRY, WOULD THEY POSSIBLY HAVE
26 CONSIDERED DEFENDING THE CHURCH. BUT I WAS NOT AWARE OF
27 THAT HAPPENING.

28 Q YOU PERSONALLY WERE NOT AWARE OF THOSE?

1 A NO.

2 Q OKAY. ONE LAST QUESTION.

3 WHEN YOU LEFT THE CHURCH, DID YOU GET A LETTER
4 FROM ELIZABETH THAT SAID THAT YOU HAD COMMITTED SPIRITUAL
5 SUICIDE?

6 A YES.

7 MR. MIDDLETON: NO FURTHER QUESTIONS, YOUR HONOR.

8 THANK YOU.

9

10 CROSS-EXAMINATION +

11 BY MR. KLEIN:

12 Q THIS LETTER THAT YOU RECEIVED FROM ELIZABETH
13 CLARE PROPHET, DID YOU BRING IT WITH YOU?

14 A NO. IT IS IN NORTHERN CALIFORNIA. I HAD NO
15 IDEA THAT I WAS COMING.

16 Q WHEN YOU CAME FROM NORTHERN CALIFORNIA, DID YOU
17 KNOW YOU WERE GOING TO TESTIFY AT THIS TRIAL?

18 A NO, I DID NOT.

19 Q YOU JUST WANDERED IN?

20 A I DIDN'T KNOW THERE WAS A TRIAL UNTIL TIMOTHY
21 CALLED ME.

22 Q WHEN YOU CAME DOWN FROM NORTHERN CALIFORNIA,
23 DID YOU THINK YOU MIGHT BE COMING HERE TO TESTIFY?

24 A NO, I DID NOT.

25 Q SO WE DON'T GET TO SEE THE LETTER; IS THAT
26 CORRECT?

27 A I WOULD BE HAPPY TO FORWARD IT.

28 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR.

1 MR. MIDDLETON: NO, NO. MY WITNESS.

2 MR. LEVY: IT JUST APPEARS COUNSEL IS ARGUING WITH
3 THE WITNESS.

4 THE COURT: ONE OF YOU.

5 MR. MIDDLETON: THANK YOU.

6 THE COURT: AT THIS TIME I ASSUME IT WILL BE MR.
7 MIDDLETON.

8 MR. LEVY: YES, YOUR HONOR, IT WILL BE.

9 THE COURT: ALTHOUGH THE OBJECTION IS A GOOD
10 OBJECTION. I WANTED MR. KLEIN TO TAKE THAT INTO ACCOUNT.

11 MR. KLEIN: I AM TAKING IT INTO ACCOUNT, YOUR HONOR.

12 THE COURT: OKAY. GO AHEAD.

13 Q BY MR. KLEIN: WOULD I BE CORRECT THAT YOU
14 NEVER LIVED AT CAMELOT?

15 A CORRECT.

16 Q SO WHEN YOU TALKED ABOUT THE RULES ABOUT MOVIES
17 AND TV'S, NEWSPAPERS, YOU WOULDN'T KNOW WHAT THE RULES WERE
18 AT CAMELOT; IS THAT RIGHT?

19 A I GUESS IF CAMELOT ONLY MEANS THE PROPERTY IN
20 MALIBU, THAT'S CORRECT.

21 Q NOW, WITH RESPECT TO SUMMIT UNIVERSITY, YOU
22 SAID YOU HAD PROBLEMS GETTING NEWSPAPERS?

23 A NO. I JUST SAID THAT I NEVER GOT NEWSPAPERS.

24 Q WELL, IF YOU WANTED TO WALK OUT AND BUY A
25 NEWSPAPER, WAS THERE ANYTHING TO PREVENT YOU FROM DOING
26 THAT?

27 A I THINK I PROBABLY WOULD NOT HAVE BY SOME
28 OVERLAY OF RESTRICTION THAT THEY WERE NEGATIVE INFLUENCES

1 AND EMOTIONAL INFLUENCES THAT I DIDN'T NEED.

2 Q DID ANYBODY EVER PREVENT YOU FROM WALKING DOWN
3 THE BLOCK, PUTTING A QUARTER IN A MACHINE AND BUYING A
4 NEWSPAPER?

5 A THE TERM PREVENTION --

6 Q ANYBODY EVER TELL YOU YOU COULDN'T DO THAT?

7 A IT IS VERY POSSIBLE.

8 Q IT IS POSSIBLE SOMEONE TOLD YOU YOU COULDN'T --

9 A IF YOU LET ME EXPLAIN, I WOULD BE HAPPY TO
10 EXPLAIN.

11 Q I JUST WANT TO GET THE ANSWER.

12 DO YOU HAVE A RECOLLECTION AS YOU SIT HERE NOW
13 OF SOMEBODY TELLING YOU YOU COULDN'T WALK DOWN THE BLOCK,
14 PUT A QUARTER IN THE BOX AND TAKE OUT A NEWSPAPER?

15 A NOT IN THOSE TERMS, NO.

16 THE COURT: WHAT IS THE EXPLANATION?

17 THE WITNESS: IT JUST WASN'T -- IT WAS IN NO WAY
18 ENCOURAGED OR JUST DIDN'T FIT, DIDN'T FIT THE PHILOSOPHY.

19 Q BY MR. KLEIN: WERE YOU AT ONE TIME A BUSINESS
20 PARTNER OF RANDALL KING AFTER YOU LEFT THE CHURCH?

21 A YES.

22 Q DO YOU CONSIDER YOURSELF A PERSONAL FRIEND OF
23 RANDALL KING?

24 A YES.

25 Q DID YOU DISCUSS THIS CASE WITH RANDALL KING
26 BEFORE YOU CAME DOWN HERE TO TESTIFY?

27 A NOT IN DETAIL. WE TALKED ABOUT IT.

28 Q DID YOU TALK TO HIM FOR OVER AN HOUR ABOUT THE

1 CASE BEFORE YOU CAME TO TESTIFY?

2 A AT LUNCH TODAY, YES.

3 Q DID YOU TALK TO HIM ON THE PHONE BEFORE TODAY
4 ABOUT TESTIFYING?

5 A FOR ABOUT MAYBE A MINUTE.

6 MR. KLEIN: THANK YOU.

7 I HAVE NO FURTHER QUESTIONS.

8
9 REDIRECT EXAMINATION +

10 BY MR. MIDDLETON:

11 Q WHEN YOU SAY GOING OUT TO GET A NEWSPAPER WAS
12 NOT -- DIDN'T FIT THE TEACHINGS, WAS IT EVEN FROWNED UPON IF
13 SOMEONE DID THAT?

14 A IN MY MEMORY IT IS. IT IS A LITTLE HAZY.

15 Q ARE YOU A PERSONAL FRIEND OF GREGORY MULL'S?

16 A NO, I AM NOT.

17 Q YOU KNOW HIM AT ALL?

18 A I HAVEN'T EVEN REALLY SEEN GREGORY FOR EIGHT
19 YEARS.

20 Q DO YOU HAVE ANY FEELINGS CONCERNING HIM?

21 A COMPASSION.

22 Q JUST FOR THE EXPERIENCES THAT YOU'VE HEARD
23 CONCERNING HIM; IS THAT IT?

24 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. IT IS
25 IMPROPER REDIRECT.

26 THE COURT: LET ME HEAR THE QUESTION AGAIN.

27 (THE QUESTION WAS READ.)

28 THE COURT: SHE CAN ANSWER.

1 THE WITNESS: CORRECT.

2 Q BY MR. MIDDLETON: YOU FEEL COMPASSION FOR HIM
3 THEN?

4 A YES, I DO.

5 MR. MIDDLETON: THANK YOU.

6 MR. KLEIN: JUST ONE MOMENT, YOUR HONOR.

7 THANK YOU. NO FURTHER QUESTIONS.

8 THE COURT: ALL RIGHT. YOU ARE EXCUSED. THANK YOU.

9 MR. LEVY: YOUR HONOR, AT THIS TIME WE WOULD CALL MR.
10 EDWARD FRANCIS BACK TO THE STAND AS OUR SECOND REBUTTAL
11 WITNESS.

12
13 EDWARD L. FRANCIS, +

14 A CROSS-DEFENDANT HEREIN, CALLED AS A WITNESS BY THE
15 DEFENDANT UNDER THE PROVISIONS OF SECTION 776 OF THE
16 EVIDENCE CODE, HAVING BEEN PREVIOUSLY SWORN, TESTIFIED AS
17 FOLLOWS:

18 THE CLERK: SIR, YOU PREVIOUSLY HAVE BEEN SWORN AND
19 ARE STILL UNDER OATH. PLEASE STATE YOUR NAME AGAIN FOR THE
20 RECORD.

21 THE WITNESS: EDWARD L. FRANCIS.

22 THE CLERK: THANK YOU.

23 MR. LEVY: YOUR HONOR, WE'D LIKE TO MARK THE NEXT
24 EXHIBIT AS 126.

25 THE COURT: SO MARKED FOR IDENTIFICATION.

26 (MARKED FOR ID: ^ EXHIBIT 126, LETTER)

27 - - - - - ^ DATED 4-8-81)

28 MR. LEVY: THANK YOU, YOUR HONOR.

DIRECT EXAMINATION +

1
2 BY MR. LEVY:

3 Q MR. FRANCIS, YOU TESTIFIED THE OTHER DAY THAT
4 MR. MULL SENT A VERY NASTY LETTER TO THE DEPARTMENT OF
5 BUILDING AND SAFETY; IS THAT CORRECT?

6 A TO THE DEPARTMENT OF BUILDING AND SAFETY AND TO
7 THE ZONING DEPARTMENT ALSO, RIGHT.

8 Q IF I REMEMBER YOUR TESTIMONY CORRECTLY, YOU
9 ALSO SAID NOTHING HAPPENED AS A RESULT OF HIS COMPLAINT; IS
10 THAT ALSO CORRECT?

11 A I DON'T RECALL SAYING THAT.

12 Q DID SOMETHING HAPPEN AS A RESULT OF HIS
13 COMPLAINT?

14 A YES.

15 Q WHAT WAS THAT?

16 A OKAY. A NUMBER OF DIFFERENT THINGS.

17 FIRSTLY, IN REGARDS TO THE COMPLAINTS ABOUT
18 ZONING VIOLATIONS, THE DEPARTMENT OF REGIONAL PLANNING
19 INVESTIGATED, VISITED THE PROPERTY, AND INSPECTED AND ISSUED
20 A LETTER SAYING THAT NO ZONING VIOLATIONS WERE FOUND
21 SPECIFICALLY IN REGARD TO HIS ALLEGATIONS.

22 IN REGARD TO THE BUILDING PERMIT OR THE
23 BUILDING -- ALLEGED BUILDING VIOLATIONS, SOME OF THEM WERE
24 CONFIRMED AS VIOLATIONS AND SOME WERE NOT.

25 Q I COULD HAVE SWORE THE OTHER DAY, MR. FRANCIS,
26 YOU TOLD US NOTHING REALLY HAPPENED. I WANT TO SEE IF I CAN
27 HELP YOU REFRESH YOUR RECOLLECTION.

28 THE CHURCH GET A LETTER FROM THE COUNTY OF LOS

1 ANGELES, DEPARTMENT OF COUNTY ENGINEER-FACILITIES; DOES THAT
2 RING A BELL WITH YOU?

3 A YES, I AM SURE WE GOT A LETTER FROM THEM.

4 Q ON PAGE TWO OF THAT, IT REFERS TO AN ATTACHMENT
5 NUMBER 2. IT SAYS: (READING.)

6 "ENCLOSURE OF COURT AT
7 NOVITIATE BUILDING - FOR REASONS LISTED,
8 THIS AREA CANNOT BE APPROVED AND IS
9 CONSIDERED HAZARDOUS. REMOVAL IS REQUESTED
10 WITHIN 30 DAYS OF THE DATE OF THIS LETTER."

11 IS THAT WHAT THE BUILDING DEPARTMENT TOLD YOU?

12 MR. KLEIN: I WOULD MAKE THE SAME OBJECTION THAT
13 COUNSEL MADE. THAT THE WITNESS SHOULD BE ABLE TO SEE THE
14 LETTER, WHICH IS THE BEST EVIDENCE.

15 MR. LEVY: IT IS ONLY MARKED FOR IDENTIFICATION, YOUR
16 HONOR.

17 THE COURT: IF YOU ARE GOING TO BE REFERRING TO IT,
18 WHY DON'T YOU LET HIM SEE A COPY.

19 MR. LEVY: BY ALL MEANS, YOUR HONOR.

20 MR. LEVY: PAGE TWO OF THE LETTER, ATTACHMENT NUMBER
21 2.

22 THE COURT: DO YOU WANT IT RECEIVED IN EVIDENCE?

23 MR. LEVY: BY ALL MEANS, YOUR HONOR.

24 THE COURT: ANY OBJECTION?

25 MR. KLEIN: NO OBJECTION, YOUR HONOR.

26 THE COURT: RECEIVED.

27 (RECEIVED EVID: ^ EXHIBIT 126)

28 MR. LEVY: THANK YOU, YOUR HONOR.

1 THE COURT: SOLVE THAT PROBLEM.

2 Q BY MR. LEVY: WITH REGARD TO ATTACHMENT 2 THAT
3 YOU TOLD US THAT THERE WAS NO PROBLEM WITH, DID THEY TELL
4 YOU THE BUILDING WAS HAZARDOUS AND COULD NOT BE OCCUPIED?

5 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. IT
6 MISCHARACTERIZES THE TESTIMONY AND IT IS A COMPOUND
7 QUESTION.

8 THE WITNESS: I WOULD JUST LIKE TO LOOK AT IT BRIEFLY
9 IF I COULD.

10 MR. LEVY: BY ALL MEANS. PLEASE DO.

11 THE WITNESS: THERE DOESN'T SEEM TO BE A DATE ON THIS
12 LETTER, BUT -- HERE IT IS. APRIL 8, 1981. OKAY.

13 WHAT WAS THE QUESTION?

14 Q BY MR. LEVY: LOOKING AT PAGE TWO, WHERE IT
15 REFERS TO ATTACHMENT NUMBER 2, DOES IT TELL YOU THAT THE
16 BUILDING IS CONSIDERED HAZARDOUS AND REMOVAL IS REQUESTED
17 WITHIN 30 DAYS OF THE DATE OF THIS LETTER?

18 A IT IS NOT A BUILDING. THIS REFERS TO AN AWNING
19 THAT WAS ATTACHED TO THE BACK OF THE BUILDING THAT COVERED
20 A -- OH, ABOUT A PROBABLY 40 FOOT SQUARE COURTYARD THAT WAS
21 IN THE BACK OF THE BUILDING.

22 IT IS CERTAINLY TRUE THAT WE WERE NOTIFIED THAT
23 THAT WAS NOT IN ACCORDANCE WITH CODE. THE MAIN PROBLEM
24 BEING THAT IT WAS ATTACHED TO THE BUILDING.

25 Q I CALL YOUR ATTENTION TO IT -- IT SAYS,
26 "ENCLOSURE OF COURT AT NOVITIATE BUILDING"?

27 A THAT'S RIGHT. THE COURT IS IN THE BACK OF THE
28 BUILDING AND IS SIMPLY A PATIO. IT IS NOT A PART OF THE

1 BUILDING.

2 Q NOW, GOING BACK TO YOUR FORMER TESTIMONY WHERE
3 YOU TOLD US THAT NOTHING OCCURRED AS A RESULT OF MR. MULL'S
4 CONTACT TO THE DEPARTMENT OF BUILDING AND SAFETY AND THE
5 BUILDING ENGINEERS, NOW WITH THAT DOCUMENT IN FRONT OF YOU,
6 WOULD YOU NOW ACTUALLY SAY SOMETHING DID HAPPEN?

7 A I AM QUITE SURE THAT I DID NOT TELL YOU THAT
8 NOTHING OCCURRED. WHAT I TOLD YOU WAS THAT HIS LETTER TO
9 THE BUILDING DEPARTMENT, THE ZONING DEPARTMENT AND THE
10 NEWSPAPERS INCLUDED QUITE A NUMBER OF FALSE ALLEGATIONS IN
11 IT. AND I NAMED TO YOU WHAT THOSE FALSE ALLEGATIONS WERE.

12 I DID NOT NAME THESE BECAUSE IT IS
13 UNQUESTIONABLE THAT A CERTAIN NUMBER OF CODE VIOLATIONS WERE
14 TURNED UP.

15 Q YOU ARE TALKING ABOUT THOSE CODE VIOLATIONS
16 THAT MR. MULL COMPLAINED ABOUT FOR THE SAFETY OF THE PEOPLE
17 OUT THERE.

18 IF YOU LOOK AT ATTACHMENT NUMBER 4, DO WE HAVE
19 ANOTHER PROBLEM WITH THAT BUILDING? UNREINFORCED MASONRY,
20 NO PERMITS, BUILDING IS HAZARDOUS, BUILDING MUST COME DOWN,
21 CANNOT BE OCCUPIED?

22 A DOES NOT SAY BUILDING MUST COME DOWN. SAYS THE
23 USE MAY BE APPROVED UPON COMPLIANCE WITH THE LIST OF
24 REQUIREMENTS. THAT BUILDING WAS BUILT IN 1929. THAT WAS
25 ONE OF THE ORIGINAL BUILDINGS ON THE PROPERTY.

26 IN THE COURSE OF THE INVESTIGATION THAT WAS
27 BROUGHT INTO BEING BY MR. MULL'S COMPLAINT, THE BUILDING
28 DEPARTMENT TOOK THE OPPORTUNITY TO INSPECT ALL THE BUILDINGS

1 ON CAMPUS, AND FOUND A NUMBER OF THINGS THAT THEY REQUESTED
2 BE BROUGHT UP TO CODE AND WENT ALL THE WAY BACK TO 1920'S
3 WHEN A LOT OF THE BUILDINGS WERE ORIGINALLY BUILT.

4 WHAT THEY WERE SAYING WAS THAT THE CARRIAGE
5 HOUSE AS BUILT IN 1929 DID NOT MEET THE CURRENT SEISMIC CODE
6 AND THEY WANTED IT TO BE REINFORCED TO MEET THE CODE, WHICH
7 WAS DONE.

8 Q THE CARRIAGE HOUSE, THAT IS WHAT YOU WERE USING
9 FOR THE ELEMENTARY SCHOOL, WASN'T IT?

10 A AT THAT TIME, YES.

11 Q IT WAS DANGEROUS FOR THE KIDS ACCORDING TO THE
12 LETTER FROM THE BUILDING DEPARTMENT, WAS IT NOT?

13 A YES, THAT IS WHAT THEY SAID.

14 Q WHEN MR. MULL PUT THEM ON NOTICE THAT THE
15 SCHOOLROOM FOR THE CHILDREN WAS NOT SAFE, YOU STILL
16 CHARACTERIZED HIS PUTTING THEM ON THAT NOTICE AS WARFARE AND
17 ANGER, OR WOULD YOU CHANGE YOUR CHARACTERIZATION NOW AND
18 MAKE IT CONCERN FOR PEOPLE?

19 A NO. I DID NOT -- FIRST OF ALL, I DID NOT
20 MENTION THIS. I WAS REFERRING TO A HALF DOZEN OTHER THINGS
21 THAT WERE MENTIONED IN HIS LETTER THAT DID NOT -- THAT WERE
22 NOT TRUE ALLEGATIONS.

23 Q IF I RECALL, YOU TESTIFIED TO US THE OTHER DAY
24 THAT THERE IS NO PERMIT OF ANY KIND NEEDED FOR THE TENTS
25 WHEN YOU HAVE CONFERENCES; IS THAT CORRECT?

26 A THERE IS NO ZONING PERMIT, NO CONDITIONAL USE
27 PERMIT REQUIRED FOR THE TENTS AT CONFERENCES, THAT IS
28 CORRECT.

1 Q THERE ARE PERMITS REQUIRED THOUGH, ARE THERE
2 NOT?

3 A THERE IS A BUILDING PERMIT REQUIRED AND THAT
4 PERMIT HAS BEEN OBTAINED AT EVERY TIME THAT WE HAD A
5 CONFERENCE THERE.

6 Q I REFER YOU TO THIS PAGE HERE WHERE IT TALKS
7 ABOUT GETTING A PERMIT. WITH REGARD -- IT TELLS YOU YOU
8 NEED A PERMIT FROM THE FIRE DEPARTMENT, DOES IT NOT? THERE
9 IS A LINE UNDER IT.

10 A RIGHT. THAT IS TRUE. IT IS THE SAME AS -- IT
11 IS DONE IN CONJUNCTION WITH THE BUILDING DEPARTMENT PERMIT.

12 Q MR. FRANCIS, HAVE YOU EVER HEARD THE EXPRESSION
13 YOU CAN'T CORNER ME IN A ROUND HOUSE? YOUR TESTIMONY TODAY
14 IS SOMEWHAT LIKE IT WAS THE OTHER DAY. YOU HAVE A VERY --
15 THE COURT: COUNSEL.

16 Q BY MR. LEVY: ONE LAST QUESTION, MR. FRANCIS.

17 A YES, SIR.

18 Q THERE WAS A LETTER PUBLISHED IN APRIL OF 1979
19 AND THE LETTER BEARS THE SIGNATURE OF MONROE FRANCIS.

20 A MONROE FRANCIS?

21 Q PARDON ME. I GOT CONFUSED. HOW ABOUT MONROE
22 SHEARER? DO YOU REMEMBER MONROE SHEARER?

23 A YES.

24 Q HE SAYS IN THE LETTER: (READING.)

25 "IN THE HOLY CITY CAMPAIGN,
26 WE'VE RAISED \$3,784,050 IN CASH."

27 DOES THAT FIGURE SOUND ACCURATE?

28 A WHAT WAS THE DATE OF THE LETTER AGAIN, SIR?

1 Q APRIL 2ND, 1979.

2 MR. KLEIN: ONCE AGAIN YOUR HONOR, I WOULD ASK THAT
3 THE LETTER BE SHOWN TO THE WITNESS AS COUNSEL ASKED THAT I
4 DO.

5 THE COURT: THIS HE CAN ANSWER.

6 THE WITNESS: APRIL 2ND, 1979, AND IT SAYS WE HAVE
7 RAISED HOW MUCH?

8 Q BY MR. LEVY: \$3,784,050.

9 A IT IS POSSIBLE. I AM NOT FAMILIAR OFFHAND WITH
10 THE LETTER YOU ARE REFERRING TO.

11 Q AT THE TIME YOU RAISED \$3,784,000 IN CASH, IS
12 THAT THE SAME YEAR THAT ELIZABETH TOLD GREGORY THAT IF HE
13 DIDN'T PAY WHAT YOU NOW CHOSE TO CALL LOANS, THE LITTLE
14 CHILDREN WOULD HAVE TO PAY IT?

15 A NO, IT IS NOT THE SAME YEAR. SHE SAID THAT TO
16 HIM IN 1980.

17 Q OH, THAT WAS SIX MONTHS LATER, WAS IT NOT?

18 A NO. IT WAS A YEAR AND SOME MONTHS LATER.
19 WASN'T THAT IN --

20 Q FORGIVE ME.

21 A -- IN JUNE OF 1980, MY RECOLLECTION.

22 Q ALL RIGHT. THE YEAR BEFORE YOU RAISED ALMOST
23 FOUR MILLION DOLLARS, AND IT WAS JUNE OF 1980 WHERE
24 ELIZABETH TOLD GREGORY IF HE DIDN'T DONATE HIS HOME AND HIS
25 MONEY AND PAY THE CHURCH SOMETHING, THE LITTLE CHILDREN
26 WOULD HAVE TO PAY IT?

27 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. IT IS
28 ARGUMENTATIVE AND IT ALSO MISCHARACTERIZES THE STATEMENT.

1 THE COURT: HE CAN ANSWER.

2 THE WITNESS: RAISED THE MONEY AND PAID IT OUT FOR
3 THE PURCHASE OF THE PROPERTY. WE DID NOT HAVE THAT MONEY.
4 WE HAD TO PAY IT FOR THE PURCHASE OF THE PROPERTY.

5 Q BY MR. LEVY: THAT IS NOT MY QUESTION, MR.
6 FRANCIS.

7 IT WAS A YEAR AFTER YOU RAISED ALMOST FOUR
8 MILLION DOLLARS WHEN WHAT YOU TOLD MR. MULL IN THE LAST TWO
9 AND A HALF HOUR MEETING WAS THAT, "IF YOU DON'T PAY WHAT WE
10 NOW CALL A LOAN, THE LITTLE CHILDREN WILL HAVE TO PAY IT,
11 WON'T THEY"?

12 A YES, I THINK SHE DID TELL HIM THAT THE
13 SCHOLARSHIP FUND WAS OUT OF MONEY, THAT'S CORRECT.

14 MR. LEVY: NOTHING FURTHER, MR. FRANCIS.

15 MR. KLEIN: JUST ONE MOMENT, YOUR HONOR.

16

17 CROSS-EXAMINATION +

18 BY MR. KLEIN:

19 Q MR. FRANCIS, AS A RESULT OF THE LETTER FROM THE
20 COUNTY ENGINEER-FACILITIES THAT COUNSEL HAS SHOWN YOU,
21 NUMBER 126, WAS THE CHURCH EVER FINED ANY MONEY?

22 A NO. WE WERE NEVER FINED BY THE BUILDING
23 DEPARTMENT.

24 Q WAS THE CHURCH EVER PENALIZED IN ANY WAY BY THE
25 BUILDING DEPARTMENT?

26 A NO. WE WERE NEVER PENALIZED, PROSECUTED OR
27 FINED.

28 Q DURING THAT TIME THAT MR. MULL WAS AT CAMELOT,

1 DID HE EVER BRING ANY OF THESE CONCERNS TO YOUR ATTENTION?

2 A NO, NEVER.

3 Q TO YOUR KNOWLEDGE, DID HE EVER BRING IT TO
4 ANYBODY ELSE'S ATTENTION WHILE HE WAS AT CAMELOT?

5 A NOT TO MY KNOWLEDGE.

6 Q TO YOUR KNOWLEDGE, DID HE BRING THESE TO THE
7 ATTENTION OF ANYBODY AT CAMELOT PRIOR TO WRITING HIS LETTERS
8 TO THE MALIBU REGIONAL OFFICE AND WHEREVER ELSE HE WROTE
9 THEM?

10 A HE MAY HAVE MENTIONED IN ONE OF HIS LETTERS,
11 LIKE POSSIBLY EVEN THE NOVEMBER, 1980, LETTER, IN AN
12 INDIRECT SORT OF A WAY, BUT NOT PRECISELY AS HIS COMPLAINT
13 TO THE BUILDING DEPARTMENT. I WAS NOT AWARE OF WHAT HIS
14 SPECIFIC CLAIMS WERE WITH REGARD TO WHAT HE FELT WERE UNSAFE
15 CONDITIONS.

16 Q ONCE THE BUILDING DEPARTMENT MADE KNOWN TO YOU
17 THEIR FINDINGS, WERE THERE SPECIFIC CORRECTIONS MADE?

18 A DEFINITELY. THEY WERE ALL MADE AND PERMITS
19 WERE ISSUED FOR THEM BY THE BUILDING DEPARTMENT.

20 MR. KLEIN: THANK YOU VERY MUCH.

21 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

22 MR. LEVY: NOTHING FURTHER FOR THIS WITNESS, YOUR
23 HONOR.

24 THE COURT: YOU MAY STEP DOWN.

25 THE WITNESS: THANK YOU.

26 MR. LEVY: AT THIS TIME, YOUR HONOR, WE WILL CALL
27 ELIZABETH CLARE PROPHET BACK.

28 ///

1 ELIZABETH CLARE PROPHET FRANCIS, +
2 A CROSS-DEFENDANT HEREIN, CALLED AS A WITNESS BY THE
3 DEFENDANT UNDER THE PROVISIONS OF SECTION 776 OF THE
4 EVIDENCE CODE, HAVING BEEN PREVIOUSLY SWORN, TESTIFIED AS
5 FOLLOWS:

6 THE CLERK: MA 'AM, YOU PREVIOUSLY HAVE BEEN SWORN AND
7 ARE STILL UNDER OATH. PLEASE STATE YOUR NAME AGAIN FOR THE
8 RECORD.

9 THE WITNESS: ELIZABETH CLARE PROPHET FRANCIS.

10 THE CLERK: THANK YOU.

11 MR. LEVY: IT WOULD APPEAR, YOUR HONOR, I HAVE
12 MISLAID A SHEET OF PAPER, BUT I WILL GO FORWARD WITHOUT THAT
13 PARTICULAR ONE.

14 BY GEORGE, I DIDN'T. HERE IT IS.

15
16 DIRECT EXAMINATION +

17 BY MR. LEVY:

18 Q MISS FRANCIS, YOU WERE PRESENT WHEN A MR. JAMES
19 MC CAFFREY TESTIFIED, WERE YOU NOT?

20 A YES, I WAS.

21 Q DO YOU RECALL HIS TESTIMONY WITH REGARD TO HIS
22 POSITION IN THE CHURCH?

23 A I BELIEVE SO.

24 Q AND WOULD YOU TELL US WHAT HIS POSITION IN THE
25 CHURCH WAS?

26 A HE WAS ON THE BOARD OF DIRECTORS AND ON THE
27 EXECUTIVE COMMITTEE.

28 Q ASIDE FROM THAT, DID HE FUNCTION IN ANY

1 PERSONAL CAPACITY FOR YOU YOURSELF?

2 A HE SUPERVISED THE ACCOUNTING DEPARTMENT AND HE
3 ALSO SUPERVISED MY OWN ACCOUNTING.

4 Q WHEN YOU SAY YOUR OWN ACCOUNTING, YOU MEAN HE
5 WAS YOUR PERSONAL BUSINESS MANAGER?

6 A I DON'T KNOW IF I'D CALL HIM THAT. HE -- HE
7 HELPED DO THE BOOKKEEPING ON MY CHECKS, MY MONTHLY SALARY
8 AND MY EXPENSES.

9 Q DID HE ALSO HAVE YOUR POWER OF ATTORNEY?

10 A YES, HE DID. BECAUSE SOMETIMES HE HAD TO SIGN
11 CHECKS IF I WAS OUT OF TOWN, PERSONAL CHECKS FOR ME.

12 Q NOW, HIS TESTIMONY WAS THAT THE SALARY OF BOTH
13 YOURSELF AND MR. KING DURING THE YEARS WHEN YOU WERE MARRIED
14 TO MR. KING WOULD HAVE AVERAGED, FOR NOT ONLY SALARY, BUT
15 FOR YOUR EXPENSES AS THE SPIRITUAL LEADER OF THE CHURCH,
16 SOMEWHERE IN THE NEIGHBORHOOD OF 30- TO \$50,000; IS THAT
17 CORRECT?

18 A I THOUGHT HE SAID 30.

19 Q ABOUT \$30,000?

20 A I THOUGHT THAT IS WHAT HE SAID.

21 Q IS THAT THE CORRECT FIGURE?

22 A I HAVE NEVER ADDED UP BEYOND MY SALARY WHAT THE
23 BENEFITS I RECEIVE WOULD VALUE.

24 Q THERE ARE TEACHINGS IN THE CHURCH ABOUT
25 HONESTY?

26 A YES.

27 Q AND YOU YOURSELF FOLLOW THOSE TEACHINGS WITH
28 REGARD TO HONESTY?

1 A YES.

2 Q LET'S TAKE THE YEAR 1979, MA'AM. WHERE DID YOU
3 RESIDE IN 1979?

4 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCY,
5 YOUR HONOR.

6 THE COURT: SHE CAN ANSWER.

7 THE WITNESS: I THINK I RESIDED IN WESTLAKE.

8 Q BY MR. LEVY: DID YOU HAVE MORE THAN ONE
9 RESIDENCE THAT YEAR?

10 A I THINK THAT I -- ABOUT THE MIDDLE OF THE YEAR,
11 I RENTED A -- AN OFFICE TYPE OF HOUSE ARRANGEMENT AT THE
12 BEACH.

13 Q AND WHO DID YOU RENT IT FROM?

14 A I RENTED IT FROM A RALPH AND LUCILLE YANEY.

15 Q THAT IS THE PSYCHIATRIST?

16 A THAT'S RIGHT.

17 Q DO YOU RECALL HOW MUCH IT COST TO RENT THE
18 BEACH HOUSE?

19 A IT MIGHT HAVE BEEN ABOUT 1500.

20 Q A MONTH?

21 A YES. I AM NOT CERTAIN OF THE AMOUNT.

22 Q FIFTEEN HUNDRED A MONTH WOULD BE ROUGHLY
23 \$18,000 A YEAR.

24 DO YOU RECALL WHAT THE EXPENSE FOR THE WESTLAKE
25 PROPERTY WAS DURING THAT YEAR?

26 A NO, I DON'T RECALL WHAT THAT RENT WAS.

27 Q IF I WERE TO TELL YOU THAT THE LEASE SAYS THE
28 RENT ON THAT PROPERTY WAS \$16,000 FOR THE YEAR, WOULD THAT

1 REFRESH YOUR RECOLLECTION?

2 A IF THAT IS WHAT IT SAYS, IT MUST BE CORRECT.

3 Q AND IF THE LEASE ON THE BEACH PROPERTY WERE FOR
4 \$2,500 A MONTH AS OPPOSED TO \$1,500 A MONTH, WOULD THAT
5 REFRESH YOUR RECOLLECTION?

6 A IF THAT IS WHAT IT WAS, IF YOU KNOW THAT IS
7 WHAT IT WAS, I CERTAINLY WOULDN'T ARGUE WITH YOU.

8 Q NOW, DO YOU HAVE ANY RECOLLECTION AS TO WHAT
9 THE UTILITIES, THE HOUSEKEEPING AND WHAT THE INCIDENTAL
10 EXPENSES WERE ON THOSE TWO PROPERTIES?

11 A NO, I DON'T KNOW WHAT THEY WOULD BE.

12 Q ASIDE FROM THOSE TWO PROPERTIES, DID YOU NOT
13 ALSO MAINTAIN PREMISES AT CAMELOT?

14 A WHAT DO YOU MEAN BY "PREMISES"?

15 Q ACCOMMODATIONS FOR YOURSELF AND YOUR FAMILY,
16 MR. KING, YOURSELF, THE CHILDREN.

17 A WE DID NOT RESIDE AT CAMELOT. WE -- THAT IS
18 WHY WE HAD A HOME IN WESTLAKE. I DID NOT HAVE ADEQUATE
19 OFFICE SPACE FOR MYSELF OR SECRETARY. THAT IS WHY I NEEDED
20 AN OFFICE.

21 Q YOU ARE SAYING THAT THERE WERE NO FACILITIES
22 MADE AVAILABLE TO YOU AT THE TIME AT CAMELOT AND YOU HAD TO
23 GO OUTSIDE CAMELOT?

24 A THE ONLY SPACE I HAD WAS A SMALL ROOM OFF OF
25 THE CHAPEL, WHICH IS CALLED THE SACRISTY. AND I HAD NOT
26 ESTABLISHED OFFICES THERE BECAUSE IN FACT THERE WAS NOT
27 ENOUGH SPACE.

28 Q DURING THE YEAR 1979, DID YOU HAVE ANY SERVANTS

1 THAT WERE PROVIDED TO YOU AT BOTH THE BEACH HOME AND THE
2 WESTLAKE HOME AND FOR YOUR PREMISES AT CAMELOT?

3 A I WOULDN'T CALL ANY OF MY STAFF SERVANTS, BUT I
4 CERTAINLY HAD PART OF MY STAFF ASSISTING ME WITH MY
5 CHILDREN, WITH MY HOUSEHOLD AND WITH MY OFFICE WORK.

6 Q HOW ABOUT YOUR FULL-TIME COOK? DID YOU HAVE A
7 FULL-TIME COOK DURING THE YEAR 1979?

8 A I DON'T THINK ANY OF THE COOKS THAT COOKED FOR
9 ME WERE FULL-TIME FOR ME. THEY WORKED IN THE CAFETERIA AS
10 WELL AS IN MY HOUSEHOLD.

11 Q DID YOU HAVE A PART-TIME CHAUFFEUR?

12 A I HAD SOMEONE TO DRIVE ME BECAUSE I DIDN'T
13 DRIVE.

14 Q HAVE A SEAMSTRESS WORK ON YOUR GOWNS?

15 A IF I NEEDED ALTERATIONS ON MY CLOTHES, THERE
16 WERE GIRLS WHO COULD DO THEM FOR ME.

17 Q YOU HAD FOUR CHILDREN. DID YOU HAVE PEOPLE
18 TAKING CARE OF YOUR CHILDREN?

19 A I TOOK CARE OF MY CHILDREN AND I CERTAINLY HAD
20 ASSISTANCE WITH THEM.

21 Q WHAT ABOUT SECURITY GUARDS? WAS THERE ANYONE
22 ASSIGNED SPECIFICALLY FOR YOU AND YOUR FAMILY?

23 A I USED SECURITY WHEN I THOUGHT PROTECTION WAS
24 NECESSARY FOR MY CHILDREN OR MYSELF BECAUSE WE HAD AN OPEN
25 CAMPUS.

26 Q ON THE PROPERTIES OTHER THAN AT CAMELOT, DID
27 YOU HAVE GARDENERS TAKE CARE OF THE GROUNDS?

28 A WELL, THE ASHRAM HAD GARDENERS.

1 Q AND MR. MC CAFFREY, WOULD IT BE FAIR TO SAY
2 THAT HE WAS AT LEAST PART-TIME YOUR PERSONAL BUSINESS
3 MANAGER?

4 A I WOULDN'T SAY SO. I WOULD SAY HE HELPED KEEP
5 MY CHECKING ACCOUNT AND DID SOME BOOKKEEPING FOR ME.

6 Q ALL THE LITTLE PEOPLE HELPED, DIDN'T THEY?

7 A WE ALL HELP EACH OTHER.

8 Q DURING THAT PERIOD OF TIME, DID YOU HAVE
9 EXPENSES FOR THE THREE CARS THAT WERE AVAILABLE TO YOU AND
10 YOUR FAMILY?

11 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. IT
12 ASSUMES A FACT NOT IN EVIDENCE.

13 THE COURT: SUSTAINED.

14 Q BY MR. LEVY: DURING THE YEAR 1979, DID YOU
15 HAVE AVAILABLE TO YOU A 98 OLDSMOBILE?

16 A YES, I HAD AN OLDSMOBILE FOR MYSELF AND MY
17 FAMILY.

18 Q A FORD L.T.D.?

19 A I DIDN'T HAVE THAT AT THE SAME TIME I HAD THE
20 OLDSMOBILE.

21 Q WHAT ABOUT A CITROEN?

22 A THAT WAS A PREVIOUS CAR. I DIDN'T HAVE ALL
23 THESE CARS AT ONCE.

24 Q IF I WERE TO ASSIGN A MINIMUM WAGE TO ALL THE
25 LITTLE PEOPLE WHO PARTICIPATED AND CHIPPED IN AND HELPED YOU
26 AND ADD UP ALL THE EXPENSES FOR THE YEAR 1979, WOULD IT
27 SURPRISE YOU THAT IT CAME TO A TOTAL OF ROUGHLY A QUARTER OF
28 A MILLION DOLLARS AFTER TAXES?

1 A I WOULD SAY THAT IS A MISCHARACTERIZATION OF
2 THE SITUATION.

3 Q I IMAGINE YOU WOULD, MA'AM.

4 A MAY I EXPLAIN?

5 Q BY ALL MEANS, PLEASE DO. LET ME GIVE YOU A
6 COPY OF --

7 A REGARDING STAFF, THEY RECEIVED ROOM AND BOARD.
8 SOMETIMES A SALARY BEYOND THAT. SOME RECEIVED MEDICAL CARE,
9 HAD THE USE OF THE FACILITIES, A CAR, GASOLINE AND OTHER
10 BENEFITS. THEY DID NOT WORK EXCLUSIVELY FOR ME.

11 NONE OF US EVER EXPECTED TO RECEIVE SALARIES
12 COMMENSURATE WITH OUR SKILLS OR SERVICE. WE SERVED AS A
13 COMMUNITY. AND AS THEY SERVED ME, I COULD SERVE THEM BY
14 DOING MY JOB, WHICH IS MORE THAN FULL-TIME.

15 WOULD YOU LIKE ME TO EXAMINE THIS NOW?

16 THE COURT: I WILL MARK THE SCHEDULE EXHIBIT NUMBER
17 127 FOR IDENTIFICATION.

18 (MARKED FOR ID: ^ EXHIBIT 127, SCHEDULE)

19 THE WITNESS: I THINK THAT THESE LISTS ARE GROSSLY
20 EXAGGERATED.

21 Q BY MR. LEVY: WHAT DOES IT COST TO SEND A CHILD
22 TO MONTESSORI SCHOOL FOR A YEAR?

23 A ABOUT \$1,200.

24 Q DID YOU HAVE FOUR CHILDREN WHO WENT TO
25 MONTESSORI SCHOOL?

26 A YES. IT IS A STAFF BENEFIT OF ALL STAFF
27 CHILDREN, NOT JUST MINE.

28 MR. LEVY: YOU NOTICE WE LIST THE FIGURE THERE OF

1 ONLY \$750 AS OPPOSED TO \$1,200 SO THAT WE DIDN'T EXAGGERATE
2 TOO MUCH.

3 YOUR HONOR, AT THIS TIME WE'D LIKE TO ENTER
4 THAT EXHIBIT INTO EVIDENCE.

5 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. THERE IS NO
6 FOUNDATION AS TO WHAT THIS EXHIBIT IS, WHERE IT CAME FROM.

7 THE COURT: SUSTAINED.

8 MR. LEVY: WE WILL SAVE IT FOR ANOTHER REBUTTAL
9 WITNESS.

10 Q MA'AM, YOUR CHURCH IS A NONPROFIT CHURCH?

11 A YES.

12 Q DID THERE COME A TIME WHEN THE CHURCH HAD A
13 PROJECT CALLED THE LAND OF LANELLO IN COLORADO?

14 A THAT'S RIGHT.

15 Q DID THE CHURCH RAISE FUNDS FOR THAT PROJECT?

16 A YES.

17 Q DID THEY EVER BUILD?

18 A NO. MY HUSBAND PASSED ON IN THE MIDDLE OF THAT
19 PROJECT.

20 Q AFTER THAT PROJECT, DID THE CHURCH HAVE A
21 PROJECT FOR SURVIVAL LOCATIONS?

22 A YES.

23 Q DID THEY RAISE FUNDS FOR THAT PROJECT?

24 A (NO AUDIBLE RESPONSE.)

25 Q THAT WAS IN IDAHO AND MONTANA?

26 A YES. AT SOME LEVELS WE RAISED FUNDS FOR THAT.
27 YES.

28 Q DID YOU EVER BUILD THE SURVIVAL CAMPS?

1 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THE
2 RELEVANCY OF THAT. RELEVANCY.

3 THE COURT: WHAT IS THE RELEVANCY OF THIS?

4 MR. LEVY: YOUR HONOR, THERE IS A COURSE OF
5 CONDUCT --

6 MR. KLEIN: YOUR HONOR --

7 THE COURT: ALL RIGHT. IF YOU WANT TO, APPROACH THE
8 BENCH.

9 (THE FOLLOWING PROCEEDINGS WERE HELD
10 AT THE BENCH:)

11 MR. LEVY: IT SHOWS A COURSE OF CONDUCT, YOUR HONOR.
12 WHAT THEY DO IS THEY HAVE A PROJECT, THEY RAISE FUNDS, THEY
13 NEVER BUILD AND THEY MOVE ON. THEY HAVE A PROJECT, THEY
14 RAISE FUNDS AND THEY NEVER BUILD.

15 WHAT WE WANT TO SHOW IS IN KEEPING WITH MR.
16 MULL, THAT WITH HIM ALSO, THERE WAS A PROJECT THAT THEY
17 NEVER INTENDED TO DO AND HE WAS A VICTIM THAT GOT CAUGHT UP
18 IN THE MACHINERY --

19 THE COURT: WHAT DOES THIS HAVE TO DO WITH THE
20 SURVIVAL?

21 MR. LEVY: THEY JUST CALLED IT A SURVIVAL CAMP. THAT
22 WAS JUST THE NAME OF THE PROJECT.

23 MR. KLEIN: CAN I BE HEARD, YOUR HONOR? COUNSEL THIS
24 MORNING SAID HE WAS GOING TO SHOW THAT THERE WERE A LOT OF
25 SIMILAR PROJECTS. BUT NOW HE IS SIMPLY GOING TO TAKE
26 ANYTHING THEY EVER DID AND PUT IT IN HERE AND SAY WELL, IF
27 THEY DIDN'T GO THROUGH WITH IT, THEN THAT IS PART OF THE
28 SCAM.

1 I THINK HE IS GOING FAR, FAR AFIELD. HE'S
2 MISSED THE RELEVANCE. WHAT I THINK WHEN YOU START TALKING
3 ABOUT SURVIVAL CAMPS, YOU NOT ONLY HAVE EVIDENCE CODE 352
4 AND 787. HE IS TRYING TO GET OTHER THINGS IN HERE FOR THE
5 JURY TO THINK ABOUT.

6 THE COURT: IF HE CAN POINT IT OUT A NUMBER OF
7 INSTANCES IN WHICH THIS HAPPENED, THE PATTERN BEGINS TO BE
8 ESTABLISHED, DOESN'T IT?

9 MR. KLEIN: MY CONCERN IS THAT WHEN YOU START GETTING
10 TO SURVIVAL CAMPS, I THINK THAT THAT, FOR WHATEVER PROBATIVE
11 VALUE THEY HAVE, IS CERTAINLY MORE PREJUDICIAL --

12 THE COURT: THAT IS A NAME. YOU CAN CALL IT ROME OR
13 PARIS OR BRUSSELS. IT IS A NAME.

14 MR. LEVY: THAT IS THE ONLY QUESTION WITH REGARD TO
15 IT.

16 THE COURT: HE CAN DO IT.

17 (THE PROCEEDINGS WERE RESUMED IN OPEN
18 COURT IN THE PRESENCE OF THE JURY:)

19 Q BY MR. LEVY: THE SURVIVAL PROJECTS, DID YOU
20 RAISE FUNDS FOR THAT?

21 A YES.

22 Q DID YOU BUILD THEM?

23 A DID I BUILD WHAT?

24 Q THE SURVIVAL PROJECTS.

25 A WELL, WE DIDN'T NECESSARILY HAVE A BUILDING
26 PROGRAM CONNECTED WITH SURVIVAL AT THAT TIME.

27 Q JUST A FUND RAISING PROGRAM?

28 A NO. WE PURCHASED LAND OR WE ACTUALLY USED LAND

1 FROM A MEMBER IN IDAHO. WE WENT FORWARD WITH OUR PROJECTS.
2 THERE WERE MANY FACETS TO THE SURVIVAL PROGRAM. WE WERE NOT
3 INTENDING TO BUILD AT THAT TIME. WE DIDN'T DO SO.

4 Q THAT WAS IN IDAHO AND MONTANA?

5 A THAT WAS IN IDAHO AT THE TIME YOU ARE SPEAKING
6 OF.

7 Q DID YOU HAVE A PROJECT CALLED COMMUNITY OF THE
8 HOLY SPIRIT?

9 A COMMUNITY OF THE HOLY SPIRIT, ARE YOU REFERRING
10 TO --

11 Q COEUR D'ALENE IDAHO.

12 A YES, THE COEUR D'ALENE PROJECTS.

13 Q DID YOU RAISE FUNDS FOR THAT PROJECT?

14 A YES, WE DID.

15 Q DID YOU BUILD THERE?

16 A WE DIDN'T INTEND TO BUILD THERE AT THAT TIME.

17 Q I SEE. FROM THERE DID THE CHURCH MOVE TO SANTA
18 BARBARA?

19 A THE CHURCH HAD ALREADY HAD A FACILITY IN SANTA
20 BARBARA AT THAT TIME.

21 Q DID THE CHURCH RAISE FUNDS TO ACQUIRE THE
22 FACILITY IN SANTA BARBARA?

23 A PRIOR TO THAT IN 1969. IDAHO WAS 1973.

24 Q WAS THE CHURCH ASKED TO LEAVE SANTA BARBARA?

25 A NO.

26 Q MISS PROPHET, DID THE CHURCH MOVE FROM SANTA
27 BARBARA BACK TO COLORADO SPRINGS?

28 A WE WENT TO COLORADO SPRINGS FOR A YEAR.

1 Q WAS THERE A PROJECT CALLED MOVE MOTHER TO LOS
2 ANGELES?

3 A YES.

4 Q DID THE CHURCH RAISE FUNDS FOR THAT PROJECT?

5 A THAT'S RIGHT.

6 Q AND YOU WERE HEADQUARTERED WHEN YOU MOVED BACK
7 TO LOS ANGELES IN PASADENA?

8 A THAT'S RIGHT.

9 Q WAS IT THE CHURCH'S INTENTION TO DEVELOP THE
10 PROPERTY THAT YOU WERE ON IN PASADENA MORE SO THAN YOU DID?

11 A NO. WE LEASED THAT PROPERTY. WE COULDN'T
12 DEVELOP IT.

13 Q DID YOU RAISE FUNDS TO EXTEND THE PASADENA
14 PROPERTY, TO ACQUIRE IT AND TO DEVELOP IT?

15 A NO, NOT TO DEVELOP IT. TO MOVE THERE.

16 Q TO ACQUIRE IT?

17 A NO. WE NEVER RAISED FUNDS TO ACQUIRE THE
18 PASADENA PROPERTY. WE RAISED FUNDS TO ACQUIRE CAMELOT.

19 Q NOW, WITH REGARD TO CAMELOT, DID THE CHURCH
20 MOVE FROM PASADENA TO CAMELOT?

21 A YES, IT DID.

22 Q DID YOU RAISE FUNDS FOR CAMELOT?

23 A YES, WE DID.

24 Q WAS MR. FRANCIS ACCURATE WHEN HE TESTIFIED THE
25 OTHER DAY THAT THERE WERE REALLY NO PLANS TO DEVELOP IT
26 OTHER THAN THE MONTESSORI SCHOOL?

27 A HE WAS SPEAKING --

28 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT

1 IS A MISCHARACTERIZATION OF THE TESTIMONY.

2 THE COURT: SHE CAN ANSWER.

3 THE WITNESS: HE WAS SPEAKING OF THE STATED PLAN
4 BETWEEN 1978 AND 1980, WHICH YOU WILL FIND ON PAGE 33 OF THE
5 MASTER PLAN.

6 Q BY MR. LEVY: DID YOU EVER TELL MR. MULL BEFORE
7 HE WAS ASKED TO COME TO CAMELOT THAT THERE WAS NO PLANS FOR
8 THE REAL DEVELOPMENT OF CAMELOT?

9 A HE KNEW WHAT WE WERE GOING TO DO IN '78 TO '80.
10 WHICH WAS NOT TO BUILD, BUT TO RENOVATE AND TO PAY FOR THE
11 PREMISES, WHICH IS WHAT WE DID.

12 Q IS THE CHURCH NOW IN A POSITION OF HAVING
13 ACQUIRED YET ANOTHER PREMISES CALLED THE INNER RETREAT IN
14 MONTANA?

15 A THAT'S RIGHT.

16 Q DID YOU RAISE FUNDS FOR THAT PROJECT?

17 A YES, WE DID.

18 Q IS THAT ANOTHER ONE THAT'S NOT QUITE GOING TO
19 BE DEVELOPED?

20 A WE PLAN TO DEVELOP IT.

21 Q ISN'T IT A FACT, MISS PROPHET, THAT NOT ONCE,
22 BUT SIX OR SEVEN DIFFERENT TIMES, THE CHURCH HAS RAISED
23 FUNDS; AND THEN IN THE COURSE OF RAISING THE FUNDS, THEY
24 TOLD THE FLOCK THAT, "WE ARE GOING TO ACQUIRE THE PROPERTY
25 AND DEVELOP THE PROPERTY"; AND IN EACH OF THOSE OCCASIONS
26 AFTER THE MONEY WAS RAISED, THERE WAS ANOTHER MOVE, BUT NO
27 DEVELOPMENT OF THE PROPERTY?

28 A I WOULD HAVE TO SAY NO TO THAT QUESTION.

1 Q DID YOU EVER ACQUIRE PROPERTY FROM A CHURCH
2 MEMBER BY THE NAME OF SORENSEN?

3 A NO, WE DIDN'T ACQUIRE HIS PROPERTY.

4 Q I DIDN'T ASK IF YOU ACQUIRED HIS PROPERTY.
5 WERE NOT YOU AND HE PARTNERS IN A VENTURE WHERE YOU ACQUIRED
6 PROPERTY TOGETHER?

7 MR. KLEIN: OBJECT AS TO THE RELEVANCE OF THIS, YOUR
8 HONOR.

9 THE COURT: IF YOU WANT TO BE HEARD, APPROACH THE
10 BENCH.

11 (THE FOLLOWING PROCEEDINGS WERE HELD
12 AT THE BENCH:)

13 THE COURT: WHAT IS THE RELEVANCE OF THIS?

14 MR. LEVY: I JUST WANT TO SHOW A COURSE OF CONDUCT --
15 THE SAME COURSE OF CONDUCT, YOUR HONOR. I AM NOT GOING TO
16 GO INTO THE CLAYTON BROKERAGE OR THE I.R.S. I JUST WANT TO
17 SHOW THAT THIS IS THE DOCUMENT THAT THEY HAD PEOPLE SIGN
18 WITHOUT EVEN BEING ABLE TO SEE WHAT THE HELL THEY WERE
19 SIGNING.

20 MR. KLEIN: YOUR HONOR --

21 THE COURT: HOW DOES THAT AFFECT MR. MULL'S CASE?

22 MR. LEVY: IT SHOWS A TOTAL COURSE OF CONDUCT THAT
23 WHAT THEY WERE OUT TO DO WAS RAISE MONEY IN ANY WAY, SHAPE
24 OR FORM THEY COULD WITHOUT ANY REGARD TO ANY INDIVIDUAL.
25 EVERYTHING THEY HAVE EVER DONE HAS BEEN TO RAISE MONEY.

26 THE COURT: WHAT DO YOU PROPOSE TO PROVE WITH THIS?

27 MR. MIDDLETON: FUND RAISING.

28 MR. KLEIN: JUST ONE PERSON.

1 MR. LEVY: YOU ARE NOT RUNNING THE COURT.

2 MR. KLEIN: THAT IS WHAT THE JUDGE SAID IN THE
3 BEGINNING OF THE CASE.

4 THE COURT: STOP.

5 MR. KLEIN: I AM SORRY, YOUR HONOR. I JUST FEEL
6 GANGED UP, YOUR HONOR, EACH TIME IT IS TWO AGAINST ONE.

7 MR. LEVY: IT IS STILL ANOTHER FUND RAISING SCAM.

8 THE COURT: IF YOU DON'T CONTROL YOUR ENERGIES --

9 MR. KLEIN: I AM SORRY, YOUR HONOR.

10 THE COURT: -- I WILL REALLY MAKE YOU FEEL GANGED UP
11 ON. I HAVEN'T DONE IT YET.

12 MR. KLEIN: I AM SORRY, YOUR HONOR.

13 THE COURT: YOU KEEP PUSHING ME AND I WILL. IT IS
14 NOT TOO LATE. AND I HOPE YOU DON'T DO IT.

15 WHILE WE ARE ON THE SUBJECT, MR. LEVY, SOME OF
16 YOUR COMMENTS ARE SIMILARLY DISAPPROVED.

17 MR. LEVY: I WILL TAKE THAT AS CONSTRUCTIVE CRITICISM
18 AND MIND MY MOUTH.

19 THE COURT: A COUPLE OF COMMENTS TODAY WOULD HAVE
20 BEEN A BETTER DAY WITHOUT SEVERAL OF THEM.

21 MR. LEVY: YES, YOUR HONOR.

22 THE COURT: NOW, WHAT DOES THIS HAVE TO DO WITH MR.
23 MULL'S CASE?

24 MR. LEVY: IT SHOWS THE SAME COURSE OF CONDUCT THAT
25 ALL THIS CHURCH DOES IS HAS ONE SCAM AFTER ANOTHER TO RAISE
26 MONEY. IT SHOWS A WHOLE PATTERN. THIS IS THE DOCUMENT THAT
27 PEOPLE SIGNED WITHOUT GETTING TO SEE THE DOCUMENT. IT JUST
28 SHOWS THE QUALITY OF THE PEOPLE.

1 THE COURT: THE OTHER PROJECTS AT LEAST HAD TO DO
2 WITH LAND AND CONSTRUCTION AND HAD TO DO WITH HIS BEING ABLE
3 TO DO ARCHITECTURAL WORK. LET'S MOVE ON TO SOMETHING ELSE.

4 MR. LEVY: YOUR HONOR --

5 THE COURT: LET'S MOVE ON TO SOMETHING ELSE.

6 (THE PROCEEDINGS WERE RESUMED IN OPEN
7 COURT IN THE PRESENCE OF THE JURY:)

8 Q BY MR. LEVY: YOU RECALL THE VENTURE WITH A
9 CHURCH MEMBER BY THE NAME OF SORENSEN WHERE YOU AND HE WERE
10 GOING TO ACQUIRE PROPERTY, AND IT WOULD THEN BE TRANSFERRED
11 ON PAPER TO CHURCH MEMBERS, THAT AFTER FIVE YEARS WOULD
12 REVERT WHERE YOU AND MR. SORENSEN, AND NOT THE CHURCH
13 MEMBERS, WOULD OWN THE PROPERTY AND THE BUILDINGS THAT WERE
14 BUILT ON THE PROPERTY?

15 A THE FACTS AS YOU HAVE RELATED THEM ARE NOT
16 CORRECT.

17 Q WHY DON'T YOU CLARIFY THEM FOR ME.

18 A REYNOLD SORENSEN WAS A MEMBER WHO HAD A FARM IN
19 IDAHO. HE APPROACHED ME AT THE SUMMER OF 1973 CONFERENCE
20 AND SAID, "I KNOW THAT I HAVE BEEN PREPARING THIS PROPERTY
21 ALL OF MY LIFE FOR THE PURPOSES OF THE CHURCH. I WANT YOU
22 TO COME AND SEE IT AND LOOK AT IT FOR THE SURVIVAL RETREAT."

23 SO THIS EVENTUATED INTO OUR ACCEPTING HIS OFFER
24 AND SOME TYPE OF A PARTNERSHIP AGREEMENT WAS WORKED OUT. I
25 AM NOT RECALLING EXACTLY WHAT KIND.

26 AND HE ALSO INDICATED THAT A PORTION OF THAT
27 PROPERTY COULD BE USED BY CHURCH MEMBERS FOR HOME SITES. I
28 HAVE NO RECOLLECTION WHATSOEVER THAT THESE HOME SITES WOULD

1 BE REVERTING TO THE CHURCH. I REALLY DON'T RECALL THE LEGAL
2 ARRANGEMENTS THAT WERE MADE AT THE TIME.

3 THE REASON THE PROJECT DID NOT GO THROUGH IS
4 THAT AT A CERTAIN POINT, HE WITHDREW THE OFFER, WHICH
5 OBLIGED US TO SIMPLY PULL UP STAKES AND LEAVE. HE DECIDED
6 HE DIDN'T WANT TO GET INTO THE CHURCH PROJECT AND WE HAD NO
7 ALTERNATIVE BUT TO LEAVE HIS PROPERTY.

8 Q WASN'T THE REAL REASON THAT THE PROJECT DIDN'T
9 GO THROUGH YOU AND MR. SORENSEN HAD A DISAGREEMENT IN THAT
10 YOU WERE NOT HAPPY WITH ONLY 50 PERCENT OF CONTROL, YOU
11 WANTED TO RUN THE SHOW AND HE SAID, "SINCE IT'S MY LAND, I
12 WANT TO HAVE AN EQUAL VOICE IN WHAT GOES ON WITH THE
13 PROPERTY"? ISN'T THAT THE ACTUALITY, MISS PROPHET?

14 A NO.

15 Q DID YOU HAVE A LITTLE INVESTMENT CLUB WITH
16 RANDALL KING AND YOURSELF CALLED THE PROPHET KING INVESTMENT
17 CLUB WHEREBY YOU AND YOUR HUSBAND, MR. KING, GOT CHURCH
18 MEMBERS TO CONTRIBUTE MONEY TO YOU AND WHEREBY YOU TOOK
19 CHURCH FUNDS TO START A VENTURE FOR YOUR OWN PERSONAL
20 PROFIT?

21 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
22 RELEVANCY AND CITE 352 AND 787 OF THE EVIDENCE CODE. I
23 THINK THIS IS A SUBJECT WE HAVE DISCUSSED ALREADY ON THE
24 RECORD, YOUR HONOR.

25 THE COURT: SHE CAN ANSWER.

26 MR. LEVY: IT IS NOT THE SUBJECT WE DISCUSSED BEFORE,
27 YOUR HONOR. SOMETHING TOTALLY SEPARATE AND APART AND I JUST
28 HAVE A FEW QUESTIONS WITH REGARD TO PROPHET KING INVESTMENT

1 CLUB.

2 THE COURT: OVERRULED.

3 MR. LEVY: I HAVE TO APOLOGIZE TO THE COURT. IT IS
4 THE ONLY COPY OF THIS DOCUMENT THAT I HAVE.

5 I MAY HAVE MISSTATED. IN THE RUSH OF THINGS,
6 WE MAY ACTUALLY HAVE MORE COPIES THAN THAT. BY GEORGE, I
7 DO.

8 I WOULD ASK THAT THIS BE MARKED FOR
9 IDENTIFICATION AS EXHIBIT NUMBER 128, I BELIEVE WE ARE UP
10 TO.

11 THE COURT: SO MARKED FOR IDENTIFICATION.

12 (MARKED FOR ID: ^ EXHIBIT 128, INVESTMENT

13 - - - - - ^ CLUB DOCUMENT)

14 MR. KLEIN: YOUR HONOR, BEFORE WE GO ANY FURTHER WITH
15 THIS DOCUMENT, I WOULD ASK THAT WE APPROACH THE BENCH. I
16 BELIEVE THIS IS A SUBJECT WE HAVE ALREADY DISCUSSED.

17 MR. LEVY: TO SAVE TIME, YOUR HONOR, I DO NOT INTEND
18 TO GO ANY FURTHER --

19 THE COURT: WHY DON'T YOU APPROACH THE BENCH FOR A
20 MINUTE.

21 (THE FOLLOWING PROCEEDINGS WERE HELD

22 AT THE BENCH:)

23 THE COURT: WHAT IS THE RELEVANCY?

24 MR. LEVY: JUST ANOTHER OF WHAT THEY DID. IT IS JUST
25 ONE IN A SERIES OF WHAT THEY DID.

26 THE COURT: WERE CHURCH MEMBERS SOLICITED?

27 MR. LEVY: YES.

28 THE COURT: FOR MONEY FOR THIS PROJECT?

1 MR. LEVY: YES.

2 MR. MIDDLETON: IT IS WORSE THAN THAT. YOU WANT THE
3 FULL DETAILS OF IT?

4 THE FULL DETAILS IS THIS WAS TO BE A 50-50
5 SPLIT OF A PROPERTY THAT THEY WOULD LEASE TO THE CHURCH FOR
6 A FIVE-YEAR PERIOD AND THAT THEY WOULD THEN HAVE A FUND
7 RAISING PROJECT TO BUILD ON THAT PROPERTY.

8 AT THE END OF FIVE YEARS, THE CHURCH WOULD HAVE
9 PUT ALL THE BUILDINGS ON IT, AND THE PROPERTY WOULD REVERT
10 TO ELIZABETH AND SORENSEN AND THEY WOULD OWN PROPERTY WITH
11 ALL THE BUILDINGS ON IT FULLY DEVELOPED.

12 THE COURT: SHE CAN ANSWER.

13 MR. LEVY: THANK YOU YOUR HONOR.

14 (THE PROCEEDINGS WERE RESUMED IN OPEN
15 COURT IN THE PRESENCE OF THE JURY:)

16 Q BY MR. LEVY: MISS PROPHET, DOES YOUR CHURCH
17 HAVE A TEACHING WITH REGARD TO SPIRITUAL SUICIDE?

18 A SPIRITUAL SUICIDE. I -- I COULD GIVE A
19 TEACHING ON IT. I WOULDN'T SAY THAT IT IS SOMETHING THAT IS
20 CURRENTLY OR HAS EVER BEEN TAUGHT, BUT I COULD EXPLAIN WHAT
21 IT MEANS.

22 Q I AM SURE YOU COULD.

23 WITH REGARD TO THE PARTY WHO TESTIFIED A MOMENT
24 AGO ABOUT A LETTER THAT WAS SENT FROM YOU TO HER SAYING THAT
25 NOW THAT SHE WAS NO LONGER CONFORMING TO THE CHURCH, SHE HAD
26 COMMITTED SPIRITUAL SUICIDE, IS THAT ONE OF THE THINGS THAT
27 YOU AS THE SPIRITUAL LEADER OF THE CHURCH DOES WHEN SOMEONE
28 HAS A DISAGREEMENT WITH YOU AND LEAVES THE CHURCH?

1 A NO. THIS WAS A SPECIFIC TEACHING IN HER CASE
2 SINCE I HAD PREVIOUSLY COUNSELED HER EXTENSIVELY CONCERNING
3 PHYSICAL SUICIDE IN HER FAMILY. AND I WAS EXPLAINING TO HER
4 THAT THERE IS A PHYSICAL SUICIDE AND THERE IS A SPIRITUAL
5 SUICIDE.

6 AND IN THE CASE OF THE COMPROMISE OF ONE'S
7 SOUL, ONE HAS TO THINK IN LEVELS NOT OF A LOSS OF THE BODY,
8 BUT OF THE COMPROMISE OF THE SOUL. AND IT WAS BY CONTRAST
9 THAT I GAVE HER THE TERM SPIRITUAL SUICIDE.

10 I DIDN'T MEAN THAT SHE WAS GOING TO DIE. I WAS
11 SPEAKING ABOUT THE FACT THAT EACH DAY, PEOPLE CAN COMMIT A
12 PORTION OF THEMSELVES TO LIFE OR TO DEATH. IT IS A DAILY
13 QUESTION WE FACE BOTH SPIRITUALLY AND PHYSICALLY.

14 Q SINCE YOU WERE COUNSELING HER AND YOU WROTE HER
15 A LETTER, WERE YOU CONCERNED THAT SHE MIGHT NOT UNDERSTAND
16 THE LETTER AND THAT SHE MIGHT SUFFER SOME ADVERSE
17 CONSEQUENCES FROM A STATEMENT LIKE COMMITTING SPIRITUAL
18 SUICIDE?

19 A I WEIGHED CONSIDERABLY MY ADVICE TO HER. AND I
20 FELT THAT EVEN IF MY ADVICE WERE PAINFUL, THAT SHE WAS
21 PLACING HERSELF IN A VERY DIFFICULT SITUATION. AND THAT I
22 FELT I HAD A RESPONSIBILITY TO TELL HER MY TRUE FEELINGS IN
23 THE MATTER. SHE HAD BEEN WITH ME MANY YEARS AND I BELIEVE
24 SHE UNDERSTOOD THE TEACHING CORRECTLY.

25 Q MR. MULL HAD BEEN WITH YOU MANY YEARS. WAS
26 THERE A PARTICULAR REASON WHY YOU LABELED HIM THE BEAST OF
27 BLASPHEMY AND THE SERPENT?

28 A FIRST OF ALL, I WOULD LIKE TO SAY THAT I DID

1 NOT LABEL HIM THE BEAST OF BLASPHEMY. BUT I GAVE A TEACHING
2 CONCERNING HIS ACTIVITIES WHERE I SAID IN LINE WITH WHAT HE
3 WAS DOING, WAS PLAYING THE ROLE OF THE MOUTHPIECE OF THE
4 BEAST OF BLASPHEMY.

5 THAT TERM COMES FROM REVELATION AND I HAVE
6 TAUGHT, AS HE KNOWS, THAT BEAST DOES NOT MEAN A BIG BEAST
7 RUNNING AROUND. IT MEANS COMPOSITE ENTITY OF EVIL THAT IS
8 PLANETARY IN ITS SCOPE, THAT MAY INFLUENCE PEOPLE AND THEY
9 MAY BECOME THE UNWITNESSING TOOLS OF THAT TYPE OF A FORCE.

10 NOW, THE BIBLE DESCRIBES THAT THE BEAST OF
11 BLASPHEMY BLASPHEMES THE NAME OF GOD, THE CHURCH AND THE
12 SAINTS IN HEAVEN. GREGORY MULL WAS SPEAKING AGAINST THE
13 TEACHINGS, THE NAME OF GOD WE USE, THE SAINTS IN HEAVEN, THE
14 ASCENDED MASTERS, HE WAS SPEAKING AGAINST THE CHURCH.

15 I GAVE THIS TEACHING IN THE SAME LIGHT THAT
16 JESUS GAVE THE TEACHING TO PETER WHEN HE SAID, "GET THEE
17 BEHIND ME, SATAN." HE CALLED HIS CHIEF APOSTLE SATAN ON THE
18 OCCASION WHEN THE WORDS THAT CAME THROUGH HIM WOULD HAVE
19 DENIED JESUS HIS CRUCIFIXION. BUT HE ALSO PRAISED PETER FOR
20 PROFESSING THAT JESUS WAS THE CHRIST AND HE SAID, "UPON THIS
21 ROCK I WILL BUILD MY CHURCH."

22 EVERYONE IN OUR CHURCH UNDERSTANDS THAT FROM
23 MOMENT TO MOMENT, YOU OR I MAY BE THE INSTRUMENT OF CHRIST
24 OR ANTICHRIST BY OUR WORDS AND OUR DEEDS. I HAVE NEVER EVER
25 CONSIDERED THAT GREGORY MULL COULD POSSIBLY BE THE BEAST OF
26 BLASPHEMY, BUT ONLY THAT HE COULD AT TIMES REFLECT THAT
27 FORCE. NOT ALL THE TIME, NOT PERPETUATE AND CERTAINLY NOT
28 SOMEONE IN THE FLESH THAT WAS -- WOULD BE SOUGHT OUT AND

1 DESTROYED.

2 AND GREGORY MULL WENT TO TWO LEVELS OF SUMMIT
3 UNIVERSITY. HE HAD BEEN TO MANY CHURCH SERVICES. HE KNEW
4 THE TENOR OF THE CHARACTERIZATION. AND IT WAS GIVEN IN THE
5 LIGHT OF AN ADMONISHMENT TO ENCOURAGE HIM AND OTHERS NOT TO
6 TAKE ON THESE CHARACTERISTICS, BUT TO SEEK RATHER TO BE THE
7 INSTRUMENT OF CHRIST.

8 Q IT APPEARS YOU LIKEN YOURSELF TO BEING A
9 TEACHER ON A PAR WITH JESUS CHRIST?

10 A NOT AT ALL. I DON'T EQUATE MYSELF WITH JESUS
11 CHRIST. I SAY THAT CHRIST IS IN ALL OF US, IN YOU AND ME
12 AND EVERYONE IN THIS COURTROOM. I TRY TO FOLLOW IN HIS
13 FOOTSTEPS AND BE A GOOD MINISTER FOR HIM.

14 Q DURING THE COURSE OF THIS TRIAL, THERE WAS
15 TESTIMONY, AND THERE WAS AN EXHIBIT SHOWN, YOUR CHURCH
16 TAUGHT A DEPROGRAMING SEMINAR. AND IN THE DEPROGRAMING
17 SEMINAR, GREGORY MULL WAS LISTED AS THE BEAST OF BLASPHEMY.

18 IF THE STUDENT WHO WROTE THOSE NOTES
19 INTERPRETED IT THAT WAY, IS IT POSSIBLE THAT YOUR FOLLOWERS,
20 WHEN THEY OBSERVE THE CLOCK OF BETRAYAL AND GREGORY MULL ON
21 THAT CLOCK, MIGHT SIMILARLY MISINTERPRET YOUR INTENT?

22 A FIRST OF ALL, I WAS NOT AT THAT SEMINAR AND I
23 DO NOT KNOW THAT THOSE WORDS WERE STATED THEN.

24 I DO KNOW THAT ANYONE WHO HAS COME INTO OUR
25 TEACHINGS UNDERSTANDS THAT I TEACH THE BOOK OF REVELATION
26 AND THE CHARACTERISTICS OF THE CHARACTERS IN IT AS
27 ARCHETYPES, NOT AS BEINGS WE GO OUT AND SEARCH AND DESTROY.
28 THEY ARE ARCHETYPES OF GREAT LIGHT AND GREAT DARKNESS IN THE

1 BOOK OF REVELATION OF PROFOUND STUDY.

2 Q CAN YOU EXPLAIN WHY 99 PERCENT OF YOUR
3 FOLLOWERS AND PEOPLE EVEN NO LONGER WITH YOUR CHURCH ARE
4 UNDER THE IMPRESSION THAT THE ONLY REASON YOU AND YOUR
5 CHURCH IS HERE IS BECAUSE GREGORY MULL SUED YOU?

6 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT
7 IS BASED ON FACTS NOT IN EVIDENCE.

8 THE COURT: SUSTAINED.

9 Q BY MR. LEVY: IS IT NOT A FACT THAT THE
10 INFORMATION DISSEMINATED BY YOU TO YOUR FOLLOWERS SAYS THAT
11 GREGORY MULL SUED YOU AND THAT'S WHY YOU ARE HERE TODAY?

12 A MY FOLLOWERS KNOW THAT I SUED MR. MULL, THAT
13 THE CHURCH SUED MR. MULL.

14 Q DO YOU HAVE ANY EXPLANATION WHY THE YOUNG LADY
15 JUST BEFORE YOU WHO TESTIFIED JUST A FEW MOMENTS AGO WAS
16 LABORING UNDER THAT MISAPPREHENSION THEN?

17 SHE WAS EVEN CALLED BY TIMOTHY O'CONNOR (SIC)
18 TO COME HERE AND TESTIFY IN THIS LAWSUIT. THAT WAS HER
19 TESTIMONY.

20 A SHE HAS NOT BEEN WITH THE ORGANIZATION THE
21 ENTIRE PERIOD OF THE PROBLEM WITH MR. MULL. SHE WAS NOT
22 HERE WHEN HE LEFT. I DON'T KNOW WHY SHE WOULD BE AWARE OF
23 THE SPECIFIC DETAILS OF THIS LAWSUIT.

24 Q ISN'T IT A FACT, MISS PROPHET, THAT YOU HAVE
25 HAD PEOPLE ON THE TELEPHONE TREE SOLICITING PEOPLE ALL OVER
26 THE COUNTRY, INCLUDING YOURSELF ON THAT TELEPHONE TREE,
27 TRYING TO FIND SOMEONE WHO COULD THINK OF ANYTHING BAD THAT
28 THEY MIGHT COME IN HERE AND TESTIFY ABOUT WITH REGARD TO MR.

1 MULL?

2 A INCLUDING MYSELF SOLICITING PEOPLE?

3 Q YES, MA'AM. DID YOU NOT PICK UP THE PHONE AND
4 USE IT AS PART OF THE TELEPHONE TREE TO TALK TO PEOPLE TO
5 SEE IF THEY WOULD COME INTO THIS COURT AND TESTIFY WITH
6 REGARD TO ANYTHING THEY POSSIBLY COULD TO DENIGRATE MR.
7 MULL?

8 A NO, I HAVE NOT DONE THAT.

9 Q DID YOU NOT TALK TO MR. JOHN PIETRANGELO TO SEE
10 IF HE ALSO WOULD COME TO THIS COURT?

11 A JOHN PIETRANGELO CALLED ME. I DID NOT CALL
12 HIM.

13 Q OUT OF THE CLEAR BLUE SKY, HE JUST PICKED UP
14 THE PHONE, AND KNEW RIGHT WHERE YOU ARE AND CALLED YOU?

15 A THAT IS TRUE. HE CALLED CAMELOT AND I TOOK HIS
16 PHONE CALL. HE SAID HE WANTED TO COME BACK TO THE CHURCH.
17 HE SAID HE WAS CONCERNED ABOUT THE TRIAL. I SAID, "JOHN,
18 YOU KNOW, IF YOU WANT TO HELP, YOU CAN TESTIFY."

19 Q ISN'T IT A FACT THAT HE TOLD YOU THAT IF HE
20 CAME HERE, HE'D TELL THE TRUTH, AND ALL OF THE TRUTH AND HE
21 WAS TOLD HIS ASSISTANCE WAS NOT NEEDED?

22 A THAT IS NOT TRUE AT ALL. HE TOLD ME HE DID NOT
23 WANT TO TESTIFY. HE DID NOT WANT TO GET NEAR RANDALL KING.
24 HE DIDN'T WANT TO HAVE ANYTHING TO DO WITH HIM. AND HE
25 WISHED ME WELL AND ASKED ME IF HE COULD ATTEND THE
26 CONFERENCE.

27 MR. LEVY: YOUR HONOR, SINCE IT IS AFTER FOUR
28 O'CLOCK, MAY WE RESERVE THE RIGHT TO RECALL THIS WITNESS

1 TOMORROW WHEN WE CONTINUE?

2 THE COURT: ALL RIGHT. WE WILL RECESS AT THIS TIME.
3 WE WILL RESUME AT 9:15 TOMORROW MORNING. HAVE A VERY
4 PLEASANT EVENING.

5 (AT 4:05 P.M., AN ADJOURNMENT WAS TAKEN
6 UNTIL TUESDAY, MARCH 18, 1986, AT
7 9:15 A.M.)
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28