

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,)	SUPERIOR COURT
)	NO. C 358191
VS.)	
)	
GREGORY MULL,)	
)	
DEFENDANT, CROSS-COMPLAINANT AND RESPONDENT.)	
)	

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:

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FOR THE DEFENDANT,
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LAWRENCE LEVY, ESQ.
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-AND-

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COPY

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

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1 LOS ANGELES, CALIFORNIA; MONDAY, * FEBRUARY 24, 1986; 9:28 A.M.

2 -000-

3 THE COURT: PLEASE PROCEED.

4 MR. LEVY: THANK YOU. MY NEXT WITNESS IS MISS LINDA
5 WITT.

6 LINDA WITT, +
7 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
8 AS FOLLOWS:

9 THE CLERK: PLEASE BE SEATED IN THE WITNESS STAND.
10 PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR
11 FIRST AND LAST NAME.

12 THE WITNESS: MY NAME IS LINDA ANN WITT, L-I-N-D-A
13 A-N-N W-I-T-T.

14 THE CLERK: THANK YOU.

15

16 DIRECT EXAMINATION +

17

18 BY MR. LEVY:

19 Q. MISS WITT, ARE YOU MARRIED?

20 A. YES, I AM.

21 Q. WHAT WAS YOUR NAME BEFORE YOU WERE MARRIED?

22 A. LINDA MULL, M-U-L-L.

23 Q. ARE YOU GREGORY MULL'S DAUGHTER?

24 A. YES.

25 Q. I WANT TO ASK YOU A QUESTION GENTLEMEN DON'T LIKE
26 TO ASK LADIES. WOULD YOU TELL US HOW OLD YOU ARE.

27 A. I'M 24 YEARS OLD.

28 Q. I WOULD LIKE TO ASK YOU SOME QUESTIONS ABOUT SOME

1 EVENTS THAT TOOK PLACE BACK IN 1973 AND '74.

2 HOW OLD WERE YOU IN 1974?

3 A. ABOUT 13 YEARS OLD.

4 Q. CAN YOU GIVE THE COURT SOME KIND OF IDEA AS TO
5 WHAT TYPE OF MAN YOUR FATHER WAS BACK IN 1974.

6 MR. KLEIN: I'M GOING TO OBJECT AS TO VAGUE AND
7 AMBIGUOUS, YOUR HONOR.

8 THE COURT: SUSTAINED.

9 Q. BY MR. LEVY: FROM YOUR PERSPECTIVE, CAN YOU TELL
10 US WITH REGARDS TO HIS PHYSICAL APPEARANCE HOW YOUR FATHER
11 WOULD HAVE APPEARED TO YOU PHYSICALLY WHEN YOU WERE 13.

12 A. HE WAS A PRETTY STRONG PERSON AND VERY KIND AND
13 FRIENDLY AND --

14 THE COURT: I'M GOING TO ASK YOU TO KEEP YOUR VOICE UP.
15 SPEAK A LITTLE LOUDER, IF YOU CAN, SO WE CAN ALL HEAR YOU.

16 THE WITNESS: OKAY. HE WAS A VERY KIND PERSON AND VERY
17 FRIENDLY AND WOULD ALWAYS BE SHAKING PEOPLE'S HANDS AND KIND TO
18 MY FRIENDS AND RATHER OUTGOING PERSON. NOT OVERLY OUTGOING BUT
19 A VERY NICE PERSON.

20 Q. DO YOU RECALL WHEN HE BECAME INVOLVED WITH THE
21 CHURCH?

22 A. YES, I DO.

23 Q. WHEN WAS THAT?

24 A. IT WAS ABOUT 1974.

25 Q. WHAT CHURCH WAS IT THAT HE BECAME INVOLVED WITH?

26 A. CHURCH UNIVERSAL AND TRIUMPHANT.

27 Q. DID YOU DISCUSS THE CHURCH WITH YOUR FATHER?

28 A. YES, I DID.

1 Q. DO YOU RECALL WHAT HE SAID TO YOU ABOUT IT AND
2 WHAT YOU SAID TO HIM?

3 A. WELL --

4 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO HEARSAY.

5 THE COURT: IT WOULD BE HEARSAY SO FAR AS THE CHURCH IS
6 CONCERNED IF IT'S BEING OFFERED AS EVIDENCE OF THE TRUTH OF THE
7 CONTENTS OF THE STATEMENT, AND I DON'T KNOW IF THAT'S THE CASE
8 OR NOT.

9 WHY DON'T YOU REPHRASE THE QUESTION.

10 Q. BY MR. LEVY: DID YOU AFTER SPEAKING WITH YOUR
11 FATHER BACK IN THOSE DAYS HAVE AN OPPORTUNITY TO LEARN ANYTHING
12 WITH REGARD TO CHURCH UNIVERSAL AND TRIUMPHANT? IF YOU DID,
13 WOULD YOU TELL US WHAT THAT IS.

14 MR. KLEIN: I WOULD OBJECT AS TO HEARSAY.

15 THE COURT: SUSTAINED.

16 Q. BY MR. LEVY: DID YOU FORMULATE ANY OPINIONS ON
17 YOUR OWN, REGARDLESS OF HOW YOU FORMULATED THE OPINION, WITH
18 YOUR OWN THOUGHTS ABOUT CHURCH UNIVERSAL AND TRIUMPHANT?

19 A. YES. I DID.

20 Q. WOULD YOU TELL US WHAT THEY ARE.

21 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THE EXTENT SHE
22 DOESN'T SAY WHERE SHE GOT THE OPINION FROM BECAUSE OTHERWISE
23 WE'RE JUST GETTING INTO HEARSAY.

24 MR. LEVY: I THINK COUNSEL IS MAKING A --

25 THE COURT: I THINK WHAT YOU INTEND TO SUGGEST IS THAT
26 THERE IS A QUESTION AS TO THE RELEVANCY OF THIS WITNESS'S
27 OPINION.

28 MR. KLEIN: SINCE I DON'T KNOW WHAT IT IS. IT VERY WELL

1 IS AN IRRELEVANCY PROBLEM TOO. I DON'T KNOW TO WHAT EXTENT
2 SHE'S TESTIFYING AS TO THE TRUTH OF WHAT SOMEONE ELSE TOLD HER.

3 THE COURT: I DON'T EITHER.

4 MR. KLEIN: THAT'S MY PROBLEM.

5 THE COURT: PROCEED.

6 Q. BY MR. LEVY: DO YOU KNOW WHETHER YOUR FATHER
7 ATTENDED SUMMIT UNIVERSITY?

8 A. YES, I DO. AND HE DID ATTEND SUMMIT UNIVERSITY.

9 Q. DID YOU DISCUSS WITH HIM HIS HAVING ATTENDED
10 SUMMIT UNIVERSITY?

11 A. YES, HE DID. I KNEW THAT HE WAS GOING, AND HE
12 DISCUSSED THAT WITH ME.

13 Q. DID HE TELL YOU WHAT HIS ATTITUDE ABOUT THE CHURCH
14 AND SUMMIT UNIVERSITY WAS AT THAT TIME?

15 A. YES, HE DID.

16 Q. WOULD YOU TELL US WHAT THAT WAS.

17 A. HE WAS PRETTY EVEN ENTHUSIASTIC ABOUT GOING TO
18 SUMMIT UNIVERSITY. HE FELT THAT HE WAS GOING TO BECOME CLOSER
19 TO GOD AND HE WAS GOING TO LEARN TO BE VERY DISCIPLINED IN HIS
20 DIET AND THE WAY HE ACTED AND HE FELT THAT THAT WOULD INSURE
21 HIS ASCENSION INTO HEAVEN. SO --

22 Q. YOU -- EXCUSE ME. I DIDN'T MEAN TO INTERRUPT?

23 A. SO HE FELT IT WAS VERY VITAL TO HIS SPIRITUAL
24 GROWTH TO GO.

25 Q. YOU MENTIONED HIS ASCENSION. WAS THAT SOMETHING
26 THAT WAS IMPORTANT TO HIM IN YOUR OPINION?

27 A. IN MY OPINION IT WAS VERY IMPORTANT TO HIM.

28 Q. WAS THAT A CENTRAL FOCUS IN HIS LIFE?

1 A. YES. IT WAS.

2 Q. DID YOU EVER HAVE OCCASION TO SEE YOUR FATHER DO
3 DECREES?

4 A. YES. I DID.

5 Q. DO YOU REMEMBER BACK IN THOSE DAYS ABOUT HOW OFTEN
6 HE WAS DOING DECREES?

7 A. YES. HE WOULD DECREE IN THE MORNINGS BEFORE HE
8 STARTED HIS DAY AND HE WOULD DECREE WHEN HE WAS DRIVING IN A
9 CAR. THERE WERE SPECIAL DECREES TO DO WHEN YOU WERE TRAVELING
10 SO HE WOULD DECREE IN THE CAR AND HE WOULD DECREE AT NIGHTTIME
11 BEFORE HE WENT TO BED.

12 Q. HOW HAD YOUR FATHER ACTED WHEN HE WENT OUT IN
13 PUBLIC WITH YOU BEFORE HE WENT TO SUMMIT UNIVERSITY?

14 A. HE WAS A PRETTY EASY PERSON TO BE OUT IN PUBLIC
15 WITH. HE LIKED GOING TO, SAY, RESTAURANTS OR GOING TO THE
16 MOVIES OR GOING TO THE BEACH OR, YOU KNOW, LIFE WAS NORMAL.

17 Q. HOW DID HE ACT PUBLICLY AFTER HE WENT TO SUMMIT
18 UNIVERSITY?

19 A. HE WAS MORE WITHDRAWN. SUMMIT UNIVERSITY THOUGHT
20 THAT WHEN YOU SHOOK HANDS OR TOUCHED ANOTHER PERSON THAT YOUR
21 ENERGIES EXCHANGED BETWEEN ONE ANOTHER AND SO HE WAS -- HE
22 WASN'T AS APT TO GO UP AND SHAKE SOMEONE'S HAND OR GIVE THEM A
23 HUG OR THAT TYPE OF FRIENDLY GESTURE.

24 AND WHEN WE WOULD GO INTO A RESTAURANT IF THEY
25 WERE PLAYING ANY MUSIC, SAY, SOFT ROCK AND ROLL MUSIC OR
26 ANYTHING WITH A BEAT THE CHURCH CALLED THAT A VODOO BEAT AND
27 SO HE WOULD INSIST THAT THEY WOULD EITHER TURN OFF THE MUSIC OR
28 WE WOULD LEAVE AND THAT WAS VERY UNCOMFORTABLE FOR ME AT THE

1 TIME SO WE LEFT LOTS OF PLACES BECAUSE OF THAT. HE FELT THAT
2 WHAT HE WAS DOING WAS THE RIGHT THING AT THE TIME.

3 Q. DID YOU HAVE OCCASION TO VISIT YOUR FATHER WHEN HE
4 WAS GOING TO SUMMIT UNIVERSITY?

5 A. YES, I DID.

6 Q. DID YOU TALK TO HIM WHEN YOU VISITED HIM THERE?

7 A. YES, I DID.

8 Q. WAS THERE A CENTRAL FOCUS ABOUT HIM OR HIS
9 ATTITUDE WITH REGARD TO THE CHURCH THAT HE EXPRESSED TO YOU.

10 MR. KLEIN: OBJECT AS TO VAGUE AND AMBIGUOUS.

11 THE COURT: PLEASE REPHRASE IT.

12 Q. BY MR. LEVY: DID YOUR FATHER EXPRESS TO YOU WHAT
13 HIS CENTRAL CONCERN WAS WHILE HE WAS ATTENDING SUMMIT
14 UNIVERSITY?

15 A. HIS CENTRAL CONCERN WAS TO STAY IN LINE WITH THE
16 TEACHINGS OF THE CHURCH AND ALSO TO PRESENT IT IN A GOOD LIGHT
17 TO ME BECAUSE HE WANTED TO GET ME INVOLVED. I KNOW HE WAS VERY
18 CONCERNED ABOUT ALWAYS TRYING TO DO THE RIGHT THING BECAUSE HE
19 WAS WORRIED THAT IF HE DIDN'T FOLLOW RIGIDLY THE GUIDELINES OF
20 THE CHURCH THAT HE WOULDN'T MAKE HIS ASCENSION AND SO THAT WAS
21 ALWAYS SOMETHING THAT WAS ON HIS MIND THAT HE WAS ALWAYS TRYING
22 TO BETTER HIMSELF AND DISCIPLINE HIMSELF AND LIVE A STRICTER
23 LIFE AS HE COULD AND TRIED TO FOLLOW THE GUIDELINES OF THE
24 CHURCH.

25 Q. WHAT WERE YOU DOING DURING THE YEARS 1975 AND '76?
26 WHAT WAS THE MAIN PREOCCUPATION THAT YOU HAD?

27 A. I WAS IN JR. HIGH SCHOOL AT THE TIME.

28 Q. WHERE WERE YOU LIVING DURING THOSE YEARS?

1 A. I WAS LIVING WITH MY MOTHER. SHE LIVED IN SAN
2 FRANCISCO AND MY FATHER ALSO LIVED IN SAN FRANCISCO.

3 Q. DID YOU GRADUATE FROM HIGH SCHOOL?

4 A. YES, I DID.

5 Q. WHEN DID YOU GRADUATE FROM HIGH SCHOOL?

6 A. IN 1979.

7 Q. DID THERE EVER COME A TIME WHEN YOU CAME TO LIVE
8 WITH YOUR FATHER?

9 A. YES, I DID.

10 Q. WHEN WAS THAT?

11 A. IT WAS IN 1978, I BELIEVE.

12 Q. DID YOU AND HE DISCUSS THE CHURCH AT ALL?

13 A. YES, WE DID.

14 Q. WAS THERE A TIME WHEN YOUR FATHER WHILE YOU WERE
15 LIVING WITH HIM LEFT AND WENT TO THE CAMELOT?

16 A. YES, THERE WAS.

17 Q. DID YOU HAVE ANY DISCUSSIONS WITH YOUR FATHER
18 PRIOR TO HIS GOING?

19 A. YES. HE TOLD ME THAT --

20 MR. KLEIN: I'M GOING TO OBJECT. THE QUESTION WAS DID
21 YOU HAVE DISCUSSION; SHE SAID YES. ANYTHING ELSE IS NOT
22 RESPONSIVE. I DON'T KNOW IF WE'RE GETTING INTO HEARSAY AGAIN,
23 YOUR HONOR.

24 THE COURT: JUST STATE THE GROUNDS, PLEASE.

25 I THINK IT'S TIME FOR ANOTHER QUESTION.

26 MR. LEVY: THANK YOU, YOUR HONOR.

27 THE COURT: YOUR ANSWER IS YES.

28 Q. BY MR. LEVY: DID YOU DISCUSS WITH HIM THE TERMS

1 UNDER WHICH HE WAS GOING TO CAMELOT?

2 A. YES, WE DID.

3 Q. AND WHAT DID HE TELL YOU?

4 MR. KLEIN: I'M GOING TO OBJECT AS HEARSAY, YOUR HONOR.

5 MR. LEVY: SHE'S A PERCIPIENT WITNESS TO A CONVERSATION
6 WITH HER FATHER. WE'RE NOT TALKING ABOUT THE TRUTH OF THE
7 CONTENT OF WHAT HE WAS TOLD, JUST WHAT HE TOLD HER.

8 MR. KLEIN: MAY I RESPOND, YOUR HONOR?

9 THE COURT: WHAT'S THE RELEVANCY?

10 MR. LEVY: I BELIEVE SHE --

11 THE COURT: IF YOU WANT TO BE HEARD APPROACH THE BENCH,
12 PLEASE.

13 (THE FOLLOWING PROCEEDINGS WERE HELD AT
14 THE BENCH:)

15 THE COURT: THE QUESTION IS IF THE ANSWER IS NOT BEING
16 SOUGHT AS EVIDENCE OF THE TRUTH OF THE STATEMENT ITSELF THEN
17 WHAT IS THE RELEVANCY?

18 MR. LEVY: IT SHOWS HIS STATE OF MIND AS TO WHAT HE
19 BELIEVED HAD BEEN AGREED UPON. HE IS SIMPLY STATING TO HIS
20 DAUGHTER WHAT HE BELIEVED HAD BEEN AGREED UPON FOR HIM TO GO TO
21 CAMELOT AND THE INFORMATION THAT HE WAS BASING HIS CONDUCT ON.
22 WHETHER OR NOT WHAT HE TOLD HER WAS ACCURATE, TRUE OR NOT, THAT
23 AT THIS POINT I DON'T BELIEVE IS THE QUESTION. BUT HE TOLD HER
24 CERTAIN THINGS BEFORE HE WENT AND IF HE TOLD HER CERTAIN THINGS
25 HE HAD TO HAVE A STATE OF MIND AT THE TIME AND THAT'S WHAT I'M
26 CONCERNED WITH IS WHAT HE THOUGHT, WHAT HE BELIEVED AND WHAT HE
27 EXPRESSED TO HER.

28 THE COURT: OF COURSE THE DEFENDANT HAS RAISED SOME

1 QUESTIONS. LET ME ASK YOU THIS. DOES THIS HAVE TO DO WITH THE
2 FINANCIAL ARRANGEMENTS, WHETHER THEY WERE GOING TO PAY HIM OR
3 WHAT?

4 MR. LEVY: THAT IN A MINIMAL WAY. BUT THE BIG THING WAS
5 THE REASON HE WAS ASKED. THEY TOLD HIM HE WAS GOING TO DESIGN
6 A NEW JERUSALEM. THAT'S WHAT I'M GOING TOWARD, WHAT HIS
7 ATTITUDE WAS AND HIS FEELINGS WERE.

8 THE COURT: SINCE THERE IS A CONFLICT BETWEEN THE
9 PARTIES ON THIS THEN, IT IS APPROPRIATE TO ALLOW EVIDENCE OF A
10 PRIOR CONSISTENT STATEMENT.

11 MR. KLEIN: IF I MAY JUST MAKE MY OBJECTION IS THAT IT'S
12 COMING IN AS -- I BELIEVE HE'S GOING TO TALK ABOUT THINGS THAT
13 OTHERS TOLD HIM, AND IT'S COMING IN FOR THE TRUTH OF THOSE
14 STATEMENTS.

15 THE COURT: NOT IN THE FACE OF THE PROPER CAUTIONARY
16 STATEMENT FROM ME.

17 MR. KLEIN: I THINK THAT WILL BE A DIFFICULT ONE TO DO.
18 BUT I THINK AT A MINIMUM THE COURT WOULD DO THAT.

19 THE COURT: OH, LET ME DO IT.

20 MR. LEVY: THANK YOU, YOUR HONOR.

21 (THE FOLLOWINGS PROCEEDINGS WERE HELD IN OPEN COURT
22 IN THE PRESENCE OF THE JURY:)

23 THE COURT: LADIES AND GENTLEMEN, I AM GOING TO ALLOW
24 THE QUESTION TO BE ANSWERED, AND I WILL TELL YOU THAT YOU MAY
25 CONSIDER THE ANSWER TO THE PENDING QUESTION NOT AS EVIDENCE OF
26 THE TRUTH OF THE STATEMENT ITSELF BUT RATHER AS EVIDENCE OF THE
27 STATE OF MIND OF MR. MULL AT THE TIME THAT HE MADE THE
28 STATEMENT TO THE WITNESS.

1 MR. LEVY: THANK YOU, YOUR HONOR.

2 Q. I WILL REPEAT THE QUESTION TO YOU.

3 DID YOU DISCUSS WITH YOUR FATHER THE TERMS AND HIS
4 THOUGHTS BEFORE HE WENT TO CAMELOT?

5 A. YES, HE DID.

6 Q. AND WOULD YOU TELL US APPROXIMATELY WHAT HE TOLD
7 YOU.

8 A. HE TOLD ME THAT HE HAD BEEN ASKED TO COME DOWN TO
9 THEIR HEADQUARTERS IN THE MALIBU AREA THAT THEY CALLED CAMELOT
10 AND MY FATHER TOLD ME THAT THEY WANTED HIM TO BE THEIR
11 ARCHITECT TO DESIGN THEIR NEW JERUSALEM AND I KNEW THAT HE WAS
12 VERY EXCITED ABOUT IT AND HE FELT VERY HONORED THAT HE HAD BEEN
13 ASKED TO GO DOWN THERE.

14 HE ALSO TOLD ME THAT THEY HAD TOLD HIM THAT THEY
15 WOULD PAY HIS EXPENSES FOR GOING DOWN THERE. THEY WOULD NOT BE
16 GIVING HIM A SALARY BUT THAT THEY WOULD BE PAYING THE MORTGAGE
17 ON THE HOME AND EXPENSES LIKE THAT. SO HE WOULD BE ABLE TO GO
18 DOWN BECAUSE THERE WAS NO WAY OTHERWISE THAT HE COULD GO DOWN
19 AND LEAVE HIS BUSINESS CLIENTS IN SAN FRANCISCO.

20 Q. WAS YOUR FATHER MARRIED AT THAT TIME?

21 A. YES, HE WAS.

22 Q. WHO WAS HE MARRIED TO?

23 A. HE WAS MARRIED TO KATHLEEN MUELLER -- EXCUSE ME
24 KATHLEEN HAMMOND.

25 Q. WHEN HE MARRIED KATHLEEN HAMMOND SHE BECAME
26 KATHLEEN MULL?

27 A. YES.

28 Q. WERE THEY LIVING TOGETHER?

1 A. NO, THEY WEREN'T. SHE LIVED DOWN AT CAMELOT AND
2 MY FATHER LIVED IN SAN FRANCISCO.

3 Q. HAVE YOU EVER ATTENDED SUMMIT UNIVERSITY?

4 A. YES, I DID.

5 Q. WHEN DID YOU ATTEND SUMMIT UNIVERSITY?

6 A. I ATTENDED IN THE SPRING OF 1980.

7 Q. DID YOU COME TO --

8 STRIKE THAT.

9 COULD YOU TELL US WHAT YOUR EXPERIENCE AT SUMMIT
10 UNIVERSITY WAS LIKE.

11 A. YES.

12 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT AS TO THE
13 RELEVANCY OF SUMMIT UNIVERSITY IN 1980.

14 MR. LEVY: THAT WAS AT THE TIME WHEN MR. MULL --

15 THE COURT: ON THAT GROUNDS OVERRULED.

16 YOU MAY ANSWER.

17 Q. BY MR. LEVY: YOU CAN ANSWER THE QUESTION.

18 A. LIFE AT SUMMIT UNIVERSITY WAS VERY REGIMENTED.

19 THEY HAD CONTROL OF EVERY MINUTE OF YOUR DAY. THEY TOLD YOU
20 WHAT TIME TO WAKE UP AND THEY TOLD YOU THAT YOU COULDN'T WAKE
21 UP BEFORE A CERTAIN TIME. THEY BUSED US FROM A -- IT WAS A
22 CAMP FOR THE BLIND. IT WAS SOMEWHERE OUT IN THE MALIBU AREA
23 BECAUSE THEY DIDN'T HAVE ENOUGH HOUSING IN CAMELOT.

24 MR. KLEIN: YOUR HONOR, I WOULD ALSO OBJECT IT'S JUST
25 BECOMING A NARRATIVE AT THIS POINT.

26 THE COURT: IT'S TIME FOR ANOTHER QUESTION.

27 Q. BY MR. LEVY: YOU SAID THEY CONTROLLED YOUR HOURS,
28 THEY TOLD YOU WHAT TIME TO GET UP.

1 WHAT TIME WAS THAT IT THEY TOLD YOU TO GET UP?

2 A. I BELIEVE IT WAS AROUND SIX IN THE MORNING, BUT I
3 CAN'T REMEMBER SPECIFICALLY.

4 Q. WHAT TIME DID THEY TELL YOU TO GO TO BED?

5 A. IT DEPENDED UPON WHAT TIME THE DAY ENDED. IT
6 VARIED. SOMETIMES IT WAS 11 AND SOMETIMES IT WAS 12 OR 1 BUT
7 IT VARIED.

8 Q. DID THEY TELL YOU WHEN TO DECREE?

9 A. YES, THEY DID.

10 Q. HOW MANY HOURS OF DECREERING A DAY DID YOU HAVE TO
11 DO?

12 A. THERE WAS ABOUT 45 MINUTES ON THE BUS BOTH WAYS.
13 THERE WAS DECREES IN THE MORNING WHEN WE GOT INTO THE CLASSROOM
14 THEN THERE WERE DECREES AFTER LUNCH AND THEN THERE WERE DECREES
15 IN THE EVENING. WE HAD TO ATTEND -- WE HAD NIGHT CHURCH
16 SERVICES IN L.A. SO WE DECREED AND SANG SONGS ON THE BUS TO
17 L.A. AND BACK PLUS WHILE WE WERE THERE AT THE SERVICE AND THEN
18 THEY HAD SATURDAY NIGHT SERVICES AND SUNDAY SERVICES.

19 Q. IF YOU WERE TO RAP IT ALL UP HOW MANY HOURS A WEEK
20 WOULD YOU SAY THAT YOU WERE DECREERING?

21 A. I WOULD SAY MAYBE THREE HOURS A DAY SO IT WOULD BE
22 ABOUT 21 HOURS A WEEK, APPROXIMATELY.

23 Q. HOW LONG DID YOU STAY AT SUMMIT UNIVERSITY?

24 A. IT'S A THREE MONTH LONG QUARTER SO IT WAS THREE
25 MONTHS.

26 Q. DID YOUR EXPERIENCE HAVE ANY PHYSICAL AFFECT ON
27 YOU?

28 A. YES, IT DID.

1 Q. WOULD YOU TELL THE COURT WHAT THAT IS.

2 MR. KLEIN: YOUR HONOR, AGAIN I WOULD OBJECT AS TO THE
3 RELEVANCY, IF I COULD HAVE A CONTINUING OBJECTION AS TO THE
4 SUMMIT UNIVERSITY QUESTIONING.

5 THE COURT: OVERRULED.

6 Q. BY MR. LEVY: YOU CAN TELL US.

7 A. WHILE I WAS THERE FOR THE THREE MONTHS, I LOST 15
8 POUNDS AND WHILE I WAS THERE ALSO MY PERIOD STOPPED AND I
9 TALKED TO OTHER WOMEN THERE THAT WERE GOING THROUGH SUMMIT
10 UNIVERSITY AND THE SAME THING HAPPENED TO THEM.

11 MR. KLEIN: I'M GOING TO OBJECT TO CONVERSATIONS WITH
12 OTHER WOMEN, YOUR HONOR, AS HEARSAY.

13 THE COURT: SUSTAINED.

14 MR. KLEIN: ASK THAT IT BE STRICKEN.

15 THE COURT: LAST PART OF THE WITNESS'S ANSWER IS
16 STRICKEN.

17 THE JURY IS DIRECTED TO DISREGARD IT.

18 Q. BY MR. LEVY: WAS YOUR FATHER LIVING THERE AT
19 CAMELOT AT THE TIME THAT YOU ATTENDED SUMMIT UNIVERSITY?

20 A. YES, HE WAS.

21 Q. WAS HE STILL LIVING THERE WHEN YOU FINISHED YOUR
22 QUARTER?

23 A. NO, HE WAS NOT.

24 Q. DO YOU KNOW WHERE HE WAS LIVING?

25 A. YES. HE WAS LIVING IN WESTLAKE VILLAGE.

26 Q. DO YOU KNOW THE REASON FOR HIS NOT BEING THERE
27 WHEN YOU FINISHED THE QUARTER?

28 A. YES, I DO.

1 Q. WHAT IS THAT?

2 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT TO THE
3 EXTENT THAT THE ANSWER IS GOING TO BE A HEARSAY ANSWER.

4 THE COURT: OVERRULED.

5 Q. BY MR. LEVY: YOU CAN ANSWER.

6 A. HE HAD BEEN KICKED OUT OF CAMELOT.

7 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AGAIN AND ASK
8 THAT THAT ANSWER BE STRICKEN.

9 THE COURT: WHAT?

10 MR. KLEIN: I WOULD OBJECT AGAIN THAT'S A HEARSAY ANSWER
11 AND ASK THAT IT BE STRICKEN.

12 THE COURT: ON THAT GROUNDS OVERRULE.

13 Q. BY MR. LEVY: WHEN YOU FINISHED CAMELOT, DID YOU
14 REMAIN -- WHEN YOU FINISHED SUMMIT UNIVERSITY, RATHER, DID YOU
15 REMAIN AT CAMELOT?

16 A. NO, I DID NOT. WHEN THE QUARTER ENDED, I LEFT
17 THAT DAY AND I RETURNED ONE OTHER TIME FOR A WEDDING OF A
18 FRIEND THAT I HAD MADE AT SUMMIT UNIVERSITY BUT THEN I NEVER
19 RETURNED.

20 Q. WHERE DID YOU LIVE AFTER YOU LEFT CAMELOT?

21 A. I LIVED AT THE CONDOMINIUM IN WESTLAKE WITH MY
22 FATHER.

23 Q. WHAT WERE THE CIRCUMSTANCES LIKE, THE LIVING
24 CIRCUMSTANCES WHEN YOU MOVED INTO THE CONDO AND YOU WERE LIVING
25 THERE WITH YOUR FATHER?

26 MR. KLEIN: OBJECTION AS TO VAGUE AND AMBIGUOUS, YOUR
27 HONOR.

28 THE COURT: SUSTAINED.

1 Q. BY MR. LEVY: DID YOUR FATHER HAVE ENOUGH MONEY TO
2 BUY GROCERIES?

3 A. SOMETIMES THERE WASN'T ENOUGH, NO. AND --

4 Q. WOULD YOU TELL US WHAT YOU DID IN ORDER TO GET
5 GROCERIES.

6 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO THE
7 RELEVANCY.

8 THE COURT: OVERRULED.

9 YOU CAN ANSWER.

10 THE WITNESS: WE USED TO SHOP AT VON'S AND WE DISCOVERED
11 THAT BEHIND VON'S THERE WAS A DUMPSTER AND THEY WOULD THROW OUT
12 FOOD AND THINGS LIKE THAT AND IF YOU DROVE AROUND TO THE BACK
13 YOU COULD PICK UP FOOD THERE AND SO WE WOULD GET SOME OF OUR
14 FOOD FROM BACK AT THE DUMPSTER.

15 Q. HAVE YOU HAD ANY CONTACT WITH CHURCH UNIVERSAL
16 MEMBERS AFTER THE TIME YOU LEFT CAMELOT?

17 A. SOMETIMES WE'D GET --

18 MR. KLEIN: OBJECTION AS TO NONRESPONSIVE.

19 THE COURT: HAVE YOU HAD ANY CONTACT WITH MEMBERS OF
20 CHURCH UNIVERSAL SINCE YOU LEFT CAMELOT? I THINK THAT COULD BE
21 ANSWERED YES OR NO.

22 THE WITNESS: YES.

23 Q. BY MR. LEVY: WILL YOU TELL THE COURT THE NATURE
24 OF THAT CONTACT.

25 MR. KLEIN: OBJECTION AS TO THE RELEVANCY OF THAT
26 QUESTION.

27 THE COURT: OVERRULED.

28 THE WITNESS: I KNOW THAT MY DAD GOT A FEW PHONE CALLS

1 FROM PEOPLE WHO WERE STILL IN C.U.T. SOMETIMES WE WOULD GET
2 PHONE CALLS AT NIGHT AND WHEN WE WOULD PICK UP THE PHONE IT
3 WOULD STOP. SOMETIMES PEOPLE WOULD WALK BY THAT WE DIDN'T KNOW
4 THAT DIDN'T LOOK LIKE NEIGHBORS, AND MY DAD AND I WERE PRETTY
5 SCARED AT THAT TIME. THE FRIENDS THAT WE DID HAVE THAT WE KNEW
6 THAT WERE AT C.U.T. THEY DIDN'T HAVE ANYTHING TO DO WITH US
7 ANYMORE.

8 I HAD A FRIEND THERE AND WE HAD EXCHANGED CLOTHES,
9 YOU KNOW, LIKE FRIENDS DO AND SHE WROTE ME A NOTE AND BUNDLED
10 UP THE CLOTHES THAT I HAD LOANED HER AND WROTE ME A LITTLE NOTE
11 SAYING I DON'T HAVE ANY USE FOR THESE ANYMORE AND IF I COULD
12 PLEASE RETURN HER CLOTHES. SO TIES WERE SEVERED NOT ON OUR
13 PART BUT BY THE CHURCH'S PART. PEOPLE WERE TOLD NOT TO HAVE
14 ANYTHING TO DO WITH US ANYMORE.

15 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT TO THAT LAST
16 STATEMENT AND ASK IT BE STRICKEN AS A HEARSAY STATEMENT.

17 THE COURT: THE VERY LAST PART OF THE WITNESS'S ANSWER
18 IS STRICKEN. THE JURY IS DIRECTED TO DISREGARD IT.

19 Q. BY MR. LEVY: GOING BACK TO THE TIME YOU WERE AT
20 SUMMIT UNIVERSITY WAS THERE ANY KIND OF PROCEDURE THAT YOU HAD
21 TO FOLLOW WHEN YOU LEFT SUMMIT UNIVERSITY?

22 A. WE HAD -- HAD TO HAVE AN EXIT INTERVIEW.

23 THE COURT: I'M SORRY. YOU HAD TO HAVE A WHAT?

24 THE WITNESS: AN EXIT INTERVIEW IS WHAT THEY CALLED IT
25 BEFORE YOU COULD LEAVE SUMMIT UNIVERSITY.

26 Q BY MR. LEVY: DID YOU HAVE ONE OF THOSE
27 INTERVIEWS?

28 A. YES, I DID.

1 Q. WOULD YOU TELL US ABOUT IT PLEASE. WHAT HAPPENED?

2 A. WE HAD TO SIGN UP WHO WE WANTED TO HAVE THE EXIT
3 INTERVIEW WITH AND I FORGET WHO I SIGNED UP WITH BUT IT WAS NOT
4 DR. YANEY AND THEN IT WAS SWITCHED ON ME WHERE I WAS TOLD THAT I
5 HAD THE EXIT INTERVIEW WITH DR. YANEY AND I WANTED TO PICK A
6 PERSON WHO WOULD BE THE EASIEST TO GET IT OVER WITH BECAUSE BY
7 THAT POINT MY FATHER WAS NOT LIVING AT CAMELOT ANYMORE AND I
8 KNEW THAT PERMANENT STAFF KNEW ABOUT HIS LEAVING.

9 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO THE
10 RELEVANCE AND I ALSO -- AT THIS POINT IT'S JUST BECOMING A
11 NARRATIVE.

12 THE COURT: IT'S TIME FOR ANOTHER QUESTION.

13 Q BY MR. LEVY: DID YOU HAVE A MEETING WITH MR.
14 FRANCIS AND MR. MONROE SHEARER AND ANYONE ELSE BEFORE YOU LEFT
15 SUMMIT UNIVERSITY?

16 A. YES, I DID.

17 Q. WILL YOU TELL US WHO WAS THERE AT THAT MEETING
18 WITH YOU.

19 A. IT WAS MONROE SHEARER AND JAMES MCCAFFREY AND
20 EDWARD FRANCIS.

21 Q. COULD YOU TELL US IN SUBSTANCE WHAT OCCURRED
22 DURING THAT MEETING.

23 A. THEY TOLD ME THAT MY FATHER WAS NOT IN GOOD
24 STANDING WITH THE CHURCH ANYMORE AND THEY TOLD ME THAT HE WAS
25 NO LONGER WELCOMED AT THE CHURCH BUT THAT IF I WANTED TO STAY
26 ON AND -- WITH THE CHURCH THAT MY FATHER'S BEING KICKED OUT
27 WOULD NOT IMPAIR ME WANTING TO STAY. SO THEY DIDN'T CARE IF
28 THEY DIVIDED US UP. THEY WERE TRYING TO SAY THAT IF -- JUST

1 BECAUSE HE HAD LEFT I COULD STAY.

2 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO
3 NONRESPONSIVE AS TO HER INTERPRETATION AND ASK THAT IT BE
4 STRICKEN.

5 THE COURT: ANSWER CAN STAND.

6 Q. BY MR. LEVY: DURING THE YEAR 1980 WERE YOU LIVING
7 WITH YOUR FATHER?

8 A. YES, I WAS.

9 Q. AND IN THE YEAR 1980 DID YOU RESIDE WITH HIM FOR A
10 GOOD PORTION OF THAT YEAR? 1981 DID YOU RESIDE WITH HIM FOR A
11 GOOD PORTION OF THAT YEAR?

12 A. YES, I DID.

13 Q. DURING THE YEAR 1981 DID YOU HAVE OCCASION TO
14 TRAVEL WITH YOUR FATHER?

15 A. YES, I DID.

16 Q. AND WHERE DID YOU TRAVEL?

17 A. FIRST WE TRAVELED TO KENTUCKY BECAUSE WE WERE
18 SUBPOENAED TO TESTIFY AT A CHILD CUSTODY CASE.

19 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. THE ANSWER WENT
20 BEYOND THE QUESTION AND IT'S NONRESPONSIVE.

21 THE COURT: EVERYTHING AFTER "WE TRAVELED TO KENTUCKY"
22 IS STRICKEN.

23 THE JURY IS DIRECTED TO DISREGARD IT.

24 Q BY MR. LEVY: YOU TOLD US YOU TRAVELED WITH YOUR
25 FATHER TO KENTUCKY. NOW CAN YOU TELL US WHY YOU TRAVELED TO
26 KENTUCKY WITH YOUR FATHER.

27 MR. KLEIN: I WILL OBJECT AS TO THE RELEVANCE OF THAT,
28 YOUR HONOR.

1 THE COURT: CAN YOU MAKE AN OFFER OF PROOF?

2 MR. LEVY: CERTAINLY, YOUR HONOR.

3 (THE FOLLOWING PROCEEDINGS WERE HELD AT
4 THE BENCH:)

5 MR. LEVY: THERE HAS BEEN SOME QUESTION AS TO WHETHER OR
6 NOT THAT MR. MULL AND HIS DAUGHTER TRAVELED, SOME KIND OF
7 CONSPIRACY TO DESTROY THE CHURCH. IN MR. KLEIN'S OPENING
8 STATEMENT HE SAID HE INTENDED TO PROVE MR. MULL TRAVELED
9 BECAUSE OF A CONSPIRACY AND INTENDED TO DESTROY THE CHURCH.
10 I'M MERELY SHOWING WHY THEY TRAVELED AND THE CIRCUMSTANCES
11 UNDER WHICH THEY TRAVELED.

12 MR. KLEIN: YOUR HONOR, MY OPENING STATEMENT SAID
13 NOTHING ABOUT HIM TRAVELING AROUND. MY OPENING STATEMENT SAID
14 NOTHING ABOUT HIM TRAVELING AROUND. WHAT THEY'RE ATTEMPTING TO
15 DO IS BRING IN SOME KIND OF EVIDENCE ABOUT CHILD CUSTODY CASES
16 WHICH IS SIMPLY PREJUDICIAL. IF THERE IS ANY PROBATIVE VALUE
17 AT ALL THE PREJUDICIAL VALUE FAR OUTWEIGHS IT.

18 THE COURT: WHY DON'T YOU JUST ASK HIM IF IT HAD
19 ANYTHING TO DO WITH THE CHURCH.

20 MR. LEVY: I DIDN'T INTEND --

21 THE COURT: WHY DON'T YOU TELL THEM.

22 MR. LEVY: I WOULD JUST ASK THAT QUESTION IF IT HAD
23 ANYTHING TO DO WITH THE CHURCH.

24 THE COURT: TELL HER TO LIMIT HER ANSWERS TO THE
25 QUESTIONS.

26 MR. KLEIN: YOUR HONOR, MY POINT SIMPLY IS THEY
27 SHOULDN'T BRING IN THE FACT THAT HE WENT TO TESTIFY AT A CHILD
28 CUSTODY CASE. THAT'S IRRELEVANT AND IT'S PREJUDICE --

1 MR. LEVY: OKAY. I WILL LIMIT IT SO THAT DOESN'T COME
2 IN.

3 THE COURT: I REALIZE YOU MAY NOT WANT TO HEAR IT BUT
4 THAT -- LET'S PROCEED.

5 (THE FOLLOWING PROCEEDINGS WERE HELD IN THE PRESENCE
6 OF THE JURY:)

7 MR. LEVY: WOULD THE COURT BE KIND ENOUGH TO HAVE THE
8 REPORTER READ BACK THE LAST QUESTION.

9 THE COURT: OKAY.

10 (QUESTION READ.)

11 MR. KLEIN: FOR THE RECORD I WOULD OBJECT PURSUANT TO
12 352 AGAIN AND RELEVANCY.

13 MR. LEVY: YOU CAN ANSWER THE QUESTION.

14 THE COURT: WHY DON'T YOU REPHRASE THE QUESTION.

15 MR. LEVY: YES, YOUR HONOR.

16 Q. NOW, WITHOUT TELLING US ALL THE DETAILS OF WHAT
17 OCCURRED WHEN YOU WENT THERE LET ME ASK YOU THIS QUESTION.
18 THIS QUESTION YOU CAN ANSWER YES OR NO.

19 DID THE CASE THAT WAS BACK IN KENTUCKY THAT YOU
20 WERE SUBPOENAED TO HAVE ANYTHING TO DO WITH THIS CHURCH?

21 A. YES, IT DID.

22 Q. OKAY.

23 AFTER YOU WERE AT THAT TRIAL DO YOU REMEMBER WHERE
24 YOU TRAVELED THEREAFTER?

25 A. YES.

26 Q. AND WOULD YOU TELL THE COURT WHERE YOUR TRAVELS
27 TOOK YOU.

28 A. WE TRAVELED TO FLORIDA AND TO NEW JERSEY AND

1 SEVERAL OTHER PLACES. THERE WERE ABOUT FOUR PLACES ALTOGETHER.

2 Q. WHY DID YOU AND YOUR FATHER TRAVEL?

3 A. WE WERE VIDEOTAPING ON A HOME VIDEOTAPE CAMERA THE
4 TESTIMONIES OF PEOPLE WHO HAD LEFT THE CHURCH UNIVERSAL AND
5 TRIUMPHANT. LARGE PART OF IT WAS TO CONFIRM OUR BELIEF --

6 THE COURT: I'M GOING TO STOP HER AT THIS POINT.

7 Q. BY MR. LEVY: SO YOU TRAVELED AND YOU VIDEOTAPED
8 WHAT THESE PEOPLE HAD TO SAY.

9 DID YOU AND YOUR FATHER DISCUSS HIS REASONS FOR
10 DOING THAT, FOR VIDEOTAPING THESE PEOPLE?

11 A. YES.

12 Q. WHAT WAS THE DISCUSSION BETWEEN THE TWO OF YOU?
13 WHY WAS YOUR FATHER TRAVELING AROUND TALKING TO THESE EX-CHURCH
14 MEMBERS?

15 MR. KLEIN: YOUR HONOR, I OBJECT. HEARSAY.

16 THE COURT: SUSTAINED.

17 Q. BY MR. LEVY: IN YOUR OPINION, WHAT WAS THE
18 PURPOSE OF VISITING THESE EX-CHURCH MEMBERS?

19 A. HE WANTED TO HELP OTHER PEOPLE GET OUT OF CHURCH
20 UNIVERSAL AND TRIUMPHANT. AND IF -- HE FELT IF HE HAD OTHER
21 PEOPLE'S STORIES WHO HAD LEFT AND TOLD WHAT THEY HAD GONE
22 THROUGH AND WHY THEY HAD LEFT AND WHAT THEY HAD FOUND OUT WAS
23 THE REAL TRUTH THAT HE COULD HELP OTHER PEOPLE GET OUT OF THE
24 CULT.

25 Q. WAS HE TRYING TO HELP HIMSELF ALSO?

26 A. YES.

27 Q. DID YOU DO ANY OTHER TRAVELING DURING THE YEAR
28 1981 THAT WAS IN ANY WAY RELATED TO CHURCH UNIVERSAL AND

1 TRIUMPHANT?

2 A. IN 1981 WE WENT TO MONTANA.

3 Q. WHY DID YOU GO TO MONTANA?

4 A. WE WERE ASKED TO GO BY THE PARK COUNTY MINISTERIAL
5 ASSOCIATION BECAUSE --

6 MR. KLEIN: I'M GOING TO OBJECT AS NONRESPONSIVE, YOUR
7 HONOR, AND HEARSAY.

8 THE COURT: THE ANSWER CAN STAND.

9 IT'S TIME FOR ANOTHER QUESTION.

10 MR. LEVY: YES, YOUR HONOR.

11 Q. DID YOU MAKE THE TRIP TO MONTANA?

12 A. YES.

13 Q. DID YOU TALK TO THE PARK COUNTY MINISTERIAL
14 COUNCIL AND THE PUBLIC THERE?

15 A. YES.

16 Q. WAS THERE ANY UNTOWARD INCIDENTS THAT OCCURRED
17 WHILE YOU WERE DOING SO?

18 A. YES.

19 Q. WOULD YOU GIVE US A BRIEF DESCRIPTION OF WHAT
20 OCCURRED THERE.

21 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT AS TO THE
22 RELEVANCE OF IT. I'M GOING TO OBJECT TO THE EXTENT IT'S GOING
23 TO INVOLVE HEARSAY, AND I'M GOING TO OBJECT TO THE EXTENT THAT
24 IT'S GOING TO GET INTO EVIDENCE CODE 787.

25 THE COURT: I DON'T KNOW WHAT THE ANSWER IS SO I DON'T
26 KNOW IF I AGREE WITH YOU OR NOT.

27 MR. KLEIN: MAY WE HAVE AN OFFER OF PROOF PERHAPS.

28 THE COURT: WHY DON'T YOU APPROACH THE BENCH.

1 (THE FOLLOWING PROCEEDINGS WERE HELD
2 AT THE BENCH:)

3 THE COURT: IF YOU ARE A LITTLE MORE DISCRIMINATE IN
4 YOUR OBJECTION WE WILL PROCEED. I THINK YOU KNOW WHAT THE
5 ANSWERS ARE, AND I THINK YOU KNOW THAT SOME OF THEM -- AT LEAST
6 NOT ALL -- BUT SOME ARE NOT INAPPROPRIATE.

7 MR. KLEIN: WHAT THIS WITNESS IS DOING IS GOING WELL
8 BEYOND THE QUESTIONS. IT LEAVES ME IN A POSITION --

9 THE COURT: THAT IS ANOTHER PROBLEM. THAT DOESN'T MAKE
10 THE QUESTION OBJECTIONABLE.

11 DON'T YOU UNDERSTAND?

12 MR. KLEIN: WHAT I UNDERSTAND IS THAT WHAT MIGHT BE A
13 QUESTION --

14 THE COURT: YOUR WAY OF -- PUT YOUR HAND DOWN.

15 YOUR WAY FOR DEALING WITH A WITNESS WHOSE ANSWERS
16 OFTEN GO BEYOND THE QUESTIONS IS NOT TO OBJECT TO OTHERWISE
17 APPROPRIATE QUESTIONS.

18 NOW WHAT'S YOUR OFFER OF PROOF?

19 MR. LEVY: THE OFFER OF PROOF IS SIMPLY THIS. MR. MULL
20 MADE A CONFESSION TO THIS CHURCH; IT'S MY INTENTION TO SHOW
21 THAT THE INFORMATION CONTAINED IN THAT CONFESSION WAS PUBLICLY
22 DISCLOSED BY CHURCH MEMBERS WHEN THEY WERE IN MONTANA AND THAT
23 THEY HAD NO WAY OF GETTING THAT INFORMATION OTHER THAN THAT
24 CONFESSION.

25 THE COURT: THE OBJECTION IS OVERRULED. LET'S PROCEED
26 NOW.

27 MR. LEVY YOU MIGHT CAUTION HER ABOUT LISTENING TO
28 THE -- YOUR QUESTIONS AND LIMITING HER ANSWERS TO YOUR

1 QUESTIONS.

2 LET'S PROCEED.

3 MR. KLEIN: YOUR HONOR, COULD I HAVE A CONTINUING
4 OBJECTION ON THE MONTANA TESTIMONY SO I DON'T HAVE TO KEEP
5 INTERRUPTING?

6 THE COURT: I DON'T THINK THAT'S A GOOD IDEA. I'M GOING
7 TO TELL YOU THAT ONCE AGAIN SO YOU UNDERSTAND THAT I WILL NOT
8 SUSTAIN OBJECTIONS TO APPROPRIATE QUESTIONS MERELY BECAUSE
9 YOU'RE WORRIED THAT THE ANSWERS MIGHT POSSIBLY GO BEYOND THE
10 QUESTIONS ASKED. WE HAVE SAID ENOUGH. LET'S PROCEED.

11 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN
12 COURT IN THE PRESENCE OF THE JURY:)

13 Q. BY MR. LEVY: MRS. WITT, WOULD YOU TELL US -- AND
14 EXCUSE ME. PRIOR TO TELLING US, I WOULD APPRECIATE IT IF YOU
15 WOULD LISTEN VERY CAREFULLY TO MY QUESTION AND TRY JUST TO
16 RESPOND TO MY QUESTION.

17 NOW, WILL YOU TELL US BRIEFLY WHAT OCCURRED WHEN
18 YOU SPOKE BEFORE THE MINISTERIAL COUNCIL AND THE PUBLIC IN
19 MONTANA.

20 A. THERE WERE CHURCH MEMBERS IN THE AUDIENCE, AND
21 THEY WOULD STAND UP AND SAY NASTY THINGS ABOUT MY FATHER.

22 Q. WHAT KIND OF NASTY THINGS?

23 A. THEY CALLED HIM A HOMOSEXUAL, AND THEY CALLED HIM
24 A LIAR.

25 Q. AFTER THE TRIP TO MONTANA, WHAT DID YOU AND YOUR
26 FATHER DO?

27 A. WE WENT BACK HOME TO WESTLAKE.

28 Q. HOW DID YOUR FATHER APPEAR EMOTIONALLY TO YOU WHEN

1 YOU GOT BACK TO WESTLAKE?

2 A. HE JUST WASN'T IN THAT GOOD OF A SHAPE. HE WAS
3 REALLY SHOOKEN UP BY GOING TO MONTANA AND WHAT THE CULT HAD
4 STOOD UP AND SAID ABOUT HIM. IT REALLY HURT HIM.

5 Q. AND DID YOU CONTINUE TO LIVE WITH YOUR FATHER IN
6 1981?

7 A. YES, I DID.

8 Q. DID THERE COME A TIME WHEN YOU MOVED OUT?

9 A. YES.

10 Q. DID YOU STAY IN FAIRLY CLOSE CONTACT WITH YOUR
11 FATHER DURING 1981 AND '82 AND '83 AND '84?

12 A. YES.

13 Q. DID YOU CALL HIM OFTEN?

14 A. YES. AND I SAW HIM FREQUENTLY.

15 Q. DID YOU COME TO ANY CONCLUSION AS TO WHAT HIS
16 GENERAL ATTITUDE WAS WITH REGARD TO HIS CHURCH EXPERIENCE
17 DURING THAT TIME?

18 MR. KLEIN: OBJECT TO THE STATEMENT. IT CALLS FOR A
19 CONCLUSION, YOUR HONOR.

20 THE COURT: SUSTAINED.

21 Q BY MR. LEVY: DURING THOSE YEARS, HOW DID YOUR
22 FATHER APPEAR TO YOU?

23 A. COULD YOU PLEASE REPEAT THAT. I DIDN'T HEAR YOU.

24 Q. DURING THE YEARS OF '81, '82, '83, HOW DID YOUR
25 FATHER APPEAR TO YOU EMOTIONALLY?

26 A. I DIDN'T THINK THAT HE WAS ALL TOGETHER. I THINK
27 HE STILL HAD A LOT OF QUESTIONS IN HIS MIND ABOUT WHAT HAD
28 HAPPENED TO HIM, AND IT TOOK HIM YEARS TO TRY TO SORT OUT WHAT

1 WAS THE TRUTH AND WHAT WASN'T. WHAT WAS REAL AND WHAT WASN'T.

2 Q. DID THERE COME A TIME WHEN HE APPEARED TO YOU TO
3 HAVE PRETTY MUCH SORTED OUT THE TRUTH AND STARTED GETTING ON
4 WITH HIS LIFE?

5 A. EACH YEAR IT GOT A LITTLE BETTER. PROBABLY BY
6 1984 HE SEEMED TO BE GETTING TOGETHER. BUT HE STILL WASN'T THE
7 SAME PERSON THAT HE WAS WHEN I KNEW HIM BEFORE HE GOT INTO THE
8 CULT.

9 Q. TO YOUR KNOWLEDGE DID ANYTHING OCCUR IN 1984 WITH
10 REGARD TO THE CHURCH THAT HAD ANY KIND OF AFFECT ON YOUR
11 FATHER?

12 A. YES.

13 Q. WOULD YOU TELL US WHAT THAT WAS.

14 A. THE CULT TOLD ITS MEMBERS THAT MY FATHER WAS THE
15 BEAST OF BLASPHEMY AND THAT GOT HIM EXTREMELY FRIGHTENED AND HE
16 WAS FRIGHTENED FOR ME ALSO BECAUSE HE FELT THAT SOMEONE FROM
17 THE CULT MIGHT COME AND TRY TO KILL HIM.

18 Q. AND AS A RESULT OF THAT FEAR WHAT HAPPENED TO HIM?

19 MR. KLEIN: I'M GOING TO OBJECT TO HER BEING ABLE TO
20 ANSWER THAT. CONCLUSION. AS A RESULT OF THE AFFAIR WHAT
21 HAPPENED TO HIM.

22 THE COURT: SHE CAN TELL US WHAT SHE OBSERVED, WHAT SHE
23 HEARD.

24 MR. KLEIN: MY OBJECTION IS IT CALLS FOR AN EXPERTISE
25 THAT I DON'T BELIEVE SHE HAS.

26 THE COURT: SHE CAN DESCRIBE WHAT SHE OBSERVED.

27 MR. KLEIN: THE QUESTION WAS WHAT HAPPENED AS A RESULT,
28 AND I DON'T SEE HOW SHE HAS THAT EXPERTISE, YOUR HONOR.

1 THE COURT: REPHRASE THE QUESTION.

2 Q. BY MR. LEVY: DID YOUR FATHER GO TO THE HOSPITAL
3 IN 1984?

4 A. YES, HE WAS IN INTENSIVE CARE FOR ABOUT TWO OR
5 THREE DAYS.

6 Q. DID YOU DISCUSS WITH HIM WHAT IT WAS IN HIS
7 OPINION THAT LED HIM TO GO TO THE HOSPITAL?

8 MR. KLEIN: I'M GOING TO OBJECT AS TO HEARSAY. YOUR
9 HONOR.

10 THE COURT: I'M GOING TO LET THE QUESTION BE ANSWERED.

11 THE JURY MAY CONSIDER THE ANSWER NOT AS EVIDENCE
12 OF THE TRUTH OF THE STATEMENT ITSELF BUT AS EVIDENCE OF THE
13 STATE OF MIND OF MR. MULL AND ALSO AS EVIDENCE OF THE STATEMENT
14 UTTERED BY HIM AT THAT TIME.

15 YOU MAY ANSWER. PLEASE KEEP YOUR VOICE UP SO WE
16 CAN ALL HEAR.

17 THE WITNESS: OKAY.

18 COULD YOU PLEASE REPEAT THE QUESTION AGAIN.

19 Q. BY MR. LEVY: WHAT I REALLY WANT TO KNOW IS WHEN
20 YOU TALKED TO YOUR DAD AFTER HE WAS IN THE HOSPITAL WHAT DID HE
21 TELL YOU WAS THE REASON FOR HIS ENDING UP IN THE HOSPITAL?

22 A. WELL, HE KNEW FROM PEOPLE WHO HAD GOTTEN OUT OF
23 THE CULT THAT THEY WERE DOING DECREES AGAINST HIM AND THEY WERE
24 USING HIS NAME IN THE DECREES AND ASKING THAT HE BE SILENCED
25 AND THINGS LIKE THAT AND SO HE FELT THAT THERE WAS A DIRECT
26 CONNECTION BETWEEN THE DECREES AND HIM BECOMING VERY ILL AND
27 ALSO ABOUT THE CULT LABELING HIM THE BEAST OF BLASPHEMY. HE
28 WAS VERY WORRIED ABOUT THAT ALSO.

1 MR. LEVY: OKAY. I HAVE NOTHING FURTHER FROM THIS
2 WITNESS, YOUR HONOR, ON DIRECT.

3 THE COURT: GO AHEAD.

4 MR. KLEIN: THANK YOU, YOUR HONOR.

5
6 CROSS-EXAMINATION +

7 BY MR. KLIEN:

8 Q. WHEN YOU TOLD US ABOUT MEETING YOUR FATHER IN 1984
9 IN THE HOSPITAL DID HE TELL YOU THAT THE MERE FACT THAT THEY
10 DECREED AGAINST HIM THAT HE BELIEVED THAT THAT CAUSED HIM TO
11 GET SICK?

12 A. THAT WASN'T THE ONLY THING. BUT HE FELT THAT THAT
13 WAS A PART OF IT, YES.

14 Q. SO THAT HE TOLD YOU THAT IF THEY PRAYED THAT
15 SOMEBODY SHOULD GET SICK HE THINKS THAT PERSON THEN CAN GET
16 SICK AS A RESULT OF THE PRAYING?

17 MR. LEVY: I'M GOING TO OBJECT TO THE QUESTION. IT
18 MISCHARACTERIZES DECREES.

19 THE COURT: SUSTAINED.

20 Q. BY MR. KLEIN: DID HE EXPRESS TO YOU THE OPINION
21 THAT JUST BY PEOPLE AT CHURCH UNIVERSAL AND TRIUMPHANT PRAYING
22 THAT SOMEBODY COULD GET SICK THAT HE BELIEVED THE PERSON COULD
23 GET SICK AS A RESULT OF THAT?

24 A. HE WAS WORRIED THAT IT MAY BE POSSIBLE IF THE CULT
25 HAD SOME TYPE OF A POWER THAT THAT MAY BE POSSIBLE. AND HE WAS
26 WORRIED ABOUT THAT.

27 THE COURT: EXCUSE ME.

28 COUNSEL APPROACH THE BENCH FOR JUST ONE QUESTION.

(BENCH CONFERENCE NOT REPORTED.)

1
2 Q. BY MR. KLEIN: YOU HAVE USED THE TERM CULT IN
3 DESCRIBING CHURCH UNIVERSAL AND TRIUMPHANT?

4 A. YES.

5 Q. WHEN YOUR FATHER WAS A MEMBER OF CHURCH UNIVERSAL
6 DID YOU USE THE TERM THEN?

7 A. NO, NOT AT ALL.

8 Q. SINCE HE'S LEFT YOU HAVE DECIDED IT WAS A CULT; IS
9 THAT RIGHT?

10 A. THAT HAS BEEN MY OPINION, YES.

11 Q. YOU SAID THAT YOUR FATHER FELT THAT THEY CALLED
12 HIM THE BEAST OF BLASPHEMY; IS THAT RIGHT?

13 A. YES.

14 Q. DID YOUR FATHER CALL ELIZABETH CLARE PROPHET ANY
15 DEROGATORY NAMES TO YOUR KNOWLEDGE?

16 A. YES.

17 Q. DID HE CALL HER ELIZABETH CLARE PROFIT? DID YOU
18 EVER HEAR HIM SAY THAT, MISS PROFIT?

19 A. YES. THAT IS HER NAME.

20 Q. DID HE USE THE NAME PROFIT LIKE IN MONEY? DID YOU
21 EVER HEAR HIM DO THAT?

22 A. YES.

23 Q. DID YOU EVER HEAR HIM CALL HER EVEN MORE -- THERE
24 WERE OTHER DEROGATORY NAMES?

25 A. YES.

26 Q. WHICH ONES HAVE YOU HEARD HIM CALL HER IN PUBLIC?

27 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR. RELEVANCE.

28 THE COURT: I DON'T KNOW WHAT THE PERTINENCE OF THIS IS.

1 MR. KLEIN: WELL, YOUR HONOR THE WITNESS IS --

2 THE COURT: I DON'T WANT -- YOU WANT TO MAKE AN OFFER OF
3 PROOF.

4 MR. KLEIN: YES, YOUR HONOR.

5 THE COURT: WHAT'S YOUR OFFER OF PROOF?

6 (THE FOLLOWING PROCEEDINGS WERE HELD
7 OUT OF THE PRESENCE OF THE JURY:)

8 MR. KLEIN: . SIMPLY THAT IF THEY'RE BRINGING IN
9 EVIDENCE THAT ELIZABETH CLARE PROPHET LABELED HIM WITH SOME
10 NAME THEY CONSIDERED DEROGATORY AND THEY'RE BRINGING THAT IN TO
11 SHOW HOW TERRIBLE THEY TREATED HIM I THINK IT'S RELEVANT TO
12 KNOW WHETHER HE IN FACT WAS ALSO MAKING NAMES IN PUBLIC AND
13 CALLING HER NAMES. I THINK THAT TO THE EXTENT --

14 THE COURT: IN PUBLIC?

15 MR. KLEIN: YES. THAT'S MY QUESTION.

16 MR. LEVY: I DON'T CARE IF HE ASK HER THAT.

17 THE COURT: I DIDN'T UNDERSTAND THAT THE QUESTION ASKED
18 FOR WHAT HE SAID IN PUBLIC. I THOUGHT IT WAS WHAT HE MIGHT
19 HAVE SAID TO HER.

20 MR. KLEIN: THE LAST QUESTION THAT I STARTED BEGAN WITH
21 THE WORDS IN PUBLIC.

22 THE COURT: MAKE IT -- EXPRESS IT. BY THE WAY, YOU
23 MIGHT ASK WHO WAS PRESENT.

24 (THE FOLLOWING PROCEEDINGS WERE HELD
25 IN THE PRESENCE OF THE JURY:)

26 THE COURT: OKAY. PLEASE PROCEED.

27 Q. BY MR. KLEIN: TO YOUR KNOWLEDGE OTHER THAN IN A
28 CONVERSATION WITH JUST YOU PRESENT OR IN A LETTER DID YOUR

1 FATHER EVER USE ANY DEROGATORY TERMS WHEN OTHER PEOPLE WERE
2 PRESENT IN REFERRING TO ELIZABETH CLARE PROPHET?

3 A. I DON'T RECALL AT THE MOMENT. MAYBE HE DID. BUT
4 I DON'T RECALL.

5 Q. YOU SAID THAT IT WAS VERY IMPORTANT TO YOUR FATHER
6 TO MAKE HIS ASCENSION?

7 A. YES.

8 Q. WHEN DID YOU FIRST BECOME AWARE OF THAT FACT?

9 A. I'D SAY IT WAS TOWARDS THE VERY BEGINNING OF HIS
10 INVOLVEMENT THAT THAT PART OF THE -- OF C.U.T.'S TEACHING WAS
11 EMPHASIZED.

12 Q. PRIOR TO HIS INVOLVEMENT WITH CHURCH UNIVERSAL DID
13 YOUR FATHER DESIRE TO MAKE HIS ASCENSION AS FAR AS HIS
14 CONVERSATIONS WITH YOU?

15 MR. LEVY: I'M GOING TO OBJECT TO THE QUESTION. IT
16 CALLS FOR A CONCLUSION ON HER PART.

17 THE COURT: SUSTAINED.

18 Q. BY MR. KLEIN: TO YOUR KNOWLEDGE HAD YOUR FATHER
19 EVER EXPRESSED A DESIRE TO MAKE HIS ASCENSION BEFORE HE EVER
20 JOINED CHURCH UNIVERSAL AND TRIUMPHANT OR BECAME AFFILIATED
21 WITH THEM?

22 A. I WOULD HAVE TO SAY NO NOT IN THE TERMS THAT
23 YOU'RE SPEAKING OF.

24 Q. I'M USISNG THE TERMS MAKE HIS ASCENSION. DID HE
25 EVER USE THOSE TERMS IN DISCUSSIONS WITH YOU PRIOR TO WHEN HE
26 BECAME AFFILIATED WITH THE CHURCH UNIVERSAL AND TRIUMPHANT?

27 A. NO.

28 Q. WHEN HE HAD HIS MEDITATION GROUP ARE YOU AWARE OF

1 THAT TIME PERIOD?

2 A. YES, I AM.

3 Q. THAT WAS BEFORE HE JOINED CHURCH UNIVERSAL AND
4 TRIUMPHANT?

5 A. YES.

6 Q. AND HE EVER TALK ABOUT MAKING HIS ASCENSION AT
7 THAT TIME?

8 A. NOT THAT I RECALL, NO.

9 Q. DID HE EVER USE A TERM OR TERMS THAT WERE SIMILAR
10 IN SUBSTANCE TO MAKING HIS ASCENSION WHEN HE WAS IN THAT
11 MEDITATION GROUP?

12 A. I NEVER ATTENDED THE MEDITATION GROUP SO I
13 COULDN'T SAY SPECIFICALLY.

14 Q. I DON'T WANT TO GET HUNG UP ON JUST THE WORDS MAKE
15 ASCENSION. I WANT TO TALK ABOUT THE IDEA OF SPIRITUAL
16 FULFILLMENT, THE IDEA OF AN AFTERLIFE AND GETTING THE BEST
17 POSSIBLE SITUATION IN YOUR AFTERLIFE. DID YOUR FATHER EVER
18 DISCUSS WITH YOU THAT DESIRE PRIOR TO WHEN HE BECAME INVOLVED
19 WITH THE CHURCH UNIVERSAL?

20 A. YES, HE DID.

21 Q. WHAT DID HE SAY ABOUT IT PRIOR TO WHEN HE BECAME
22 INVOLVED WITH CHURCH UNIVERSAL?

23 A. HE WAS INTERESTED IN FINDING A WAY. HE FELT
24 SOMEHOW THE WAY THAT YOU WOULD PLEASE GOD AND GO TO HEAVEN OR
25 HOWEVER HE FELT AT THE TIME. I KNEW HE WAS INTERESTED IN
26 SPIRITUAL SEEKING, IF YOU WANT TO CALL IT THAT, OR SEEKING
27 AFTER WHAT WAS RIGHT.

28 Q. SO IT WOULD BE A FAIR STATEMENT THAT HE WAS VERY

1 INTERESTED -- SPIRITUAL SEEKING PRIOR TO WHEN HE BECAME
2 INVOLVED WITH CHURCH UNIVERSAL?

3 A. YES.

4 Q. YOU WENT TO SUMMIT UNIVERSITY IN THE SPRING OF
5 1980?

6 A. YES, I DID.

7 Q. PRIOR TO BEGINNING YOUR COURSE AT SUMMIT
8 UNIVERSITY, DID YOU KNOW THAT THEY HAD STRICT RULES OF BEHAVIOR
9 THERE?

10 A. YES, I DID.

11 Q. DID YOU KNOW YOU WOULD HAVE TO DECREE PRIOR TO
12 GOING?

13 A. YES, I DID.

14 Q. WOULD IT BE A FAIR STATEMENT THAT YOU HAD
15 DISCUSSED WHAT SUMMIT UNIVERSITY WAS LIKE WITH YOUR FATHER
16 PRIOR TO WHEN YOU BEGAN GOING THERE?

17 A. TO A POINT I HAD DISCUSSED IT WITH HIM, YES.

18 Q. AND YOU HAD A PRETTY GOOD IDEA AS TO WHAT WAS
19 GOING TO GO ON WHEN YOU STARTED AT SUMMIT UNIVERSITY? YOU KNEW
20 THAT BEFORE YOU EVEN STARTED, ISN'T THAT TRUE?

21 A. I HAD PART OF AN IDEA WHAT WAS GOING TO GO ON,
22 YES.

23 Q. TO THE EXTENT THERE WAS SOMETHING YOU DIDN'T KNOW
24 WAS THERE ANYTHING THAT PREVENTED YOU FROM TALKING ABOUT IT
25 WITH YOUR FATHER PRIOR TO GOING TO SUMMIT UNIVERSITY?

26 A. WELL, THERE WERE CERTAIN THINGS ABOUT SUMMIT
27 UNIVERSITY THAT YOU WERE TOLD WERE A MYSTERY AND YOU COULD ONLY
28 FIND OUT BY GOING.

1 Q. DID THOSE THINGS HAVE TO DO WITH THE HOURS OR THE
2 DECREERING, THE AMOUNT OF HOURS YOU SPENT DECREERING OR THE
3 AMOUNT OF HOURS YOU SPENT ON HOMEWORK. THINGS LIKE THAT? WERE
4 THOSE THE MYSTERIES?

5 A. NO. THERE WERE SUPPOSED TO BE SOMETHING MORE.

6 Q. SPIRITUAL?

7 A. SPIRITUAL.

8 Q. YOU HAD TO ACTUALLY FILL OUT AN APPLICATION BLANK
9 TO GO TO SUMMIT UNIVERSITY; IS THAT RIGHT?

10 A. YES, I DID.

11 Q. YOU APPLIED FOR ADMISSION?

12 A. YES.

13 Q. WHEN YOU FILLED OUT THAT APPLICATION BLANK, DID
14 YOU TELL THEM THAT YOU WANTED VERY MUCH TO HAVE THAT EXPERIENCE
15 IN SO MANY WORDS, IN SUBSTANCE?

16 A. GOING TO SUMMIT UNIVERSITY IT WAS IMPLIED THAT YOU
17 WANTED TO BECOME MORE SPIRITUALLY ENLIGHTENED, IF YOU WANT TO
18 PUT IT THAT WAY.

19 Q. DURING THE YEARS 1974 THROUGH 1980 YOUR FATHER WAS
20 AFFILIATED WITH CHURCH UNIVERSAL AND TRIUMPHANT?

21 A. YES, HE WAS.

22 Q. AND DURING THOSE YEARS DID YOU HAVE OCCASION TO
23 DISCUSS WITH HIM HIS EXPERIENCES IN THE CHURCH?

24 A. TO A CERTAIN EXTENT. BUT AFTER I GOT OUT OF
25 C.U.T. HE REVEALED A LOT OF THINGS TO ME THAT HE NEVER TOLD ME
26 BEFORE.

27 MR. KLEIN: YOUR HONOR, I WOULD ASK THAT THE SECOND PART
28 OF THAT ANSWER BE STRICKEN AS NONRESPONSIVE TO THE QUESTION.

1 MR. LEVY: IT APPEARS TO BE TOTALLY RESPONSIVE TO THE
2 QUESTION.

3 THE COURT: MOTION IS DENIED.

4 GO AHEAD. HAD YOU COMPLETED YOUR ANSWER?

5 THE WITNESS: NOT QUITE.

6 WHEN YOU WERE IN CHURCH UNIVERSAL AND TRIUMPHANT
7 YOU WERE TOLD THAT YOU COULDN'T BADMOUTH THE ASCENDING MASTERS,
8 YOU COULDN'T TELL -- YOU COULDN'T TALK BAD THINGS ABOUT THEM,
9 YOU COULDN'T EXPRESS YOUR DOUBTS OPENLY BECAUSE THAT WAS SEEN
10 AS THE DEVIL TRYING TO PUT BAD THOUGHTS INTO YOUR MIND AND SO
11 YOU WERE ALWAYS TOLD THAT YOU WOULD COME UPON TESTS AND THAT
12 YOU WERE BEING TESTED BY SATAN AND THEREFORE ALL THE DOUBTS
13 THAT YOU HAD THEY WERE FROM SATAN AND NOT REALLY YOUR OWN
14 COMMON SENSE.

15 AND SO WHEN MY FATHER WOULD HAVE DOUBTS OVER THE
16 YEARS AND HE WOULD SEE THINGS THAT HE DIDN'T FEEL WERE RIGHT HE
17 NEVER VOICED THEM TO ME BECAUSE HE FELT -- HE BELIEVED IN THE
18 ORGANIZATION. HE FELT ALL IN ALL THAT THAT WAS THE ONLY WAY
19 THAT HE COULD GO TO HEAVEN WAS TO STAY WITH CHURCH UNIVERSAL
20 AND TRIUMPHANT. SO, NO HE NEVER EXPRESSED FULLY THOUGHTS THAT
21 HE FELT. SO I GOT AN IMPERFECT PICTURE OF WHAT REALLY WENT ON.

22 AND THEN AFTER I WENT THROUGH, I FORMULATED MY OWN
23 OPINIONS AND AFTER I GOT OUT HE TOLD ME WHAT HE HAD GONE
24 THROUGH AND IF I HAD KNOWN WHAT HE HAD GONE THROUGH BEFORE I
25 WOULD HAVE NEVER GONE TO SUMMIT UNIVERSITY.

26 Q. NOW, DURING THE YEARS 1975 TO '80 YOU DID TALK TO
27 HIM ABOUT THE CHURCH; IS THAT RIGHT?

28 A. YES, I DID.

1 Q. AND HE TOLD YOU NUMEROUS THINGS ABOUT THE CHURCH;
2 IS THAT RIGHT?

3 A. YES.

4 Q. AFTER 1980 AFTER HE WAS, AS YOU SAID, KICKED OUT
5 HE TOLD YOU OTHER THINGS ABOUT THE CHURCH; IS THAT RIGHT?

6 A. THIS IS TRUE. HE REVEALED TO ME --

7 Q. ANSWER MY QUESTION. IS THAT RIGHT?

8 A. YES.

9 MR. LEVY: EXCUSE ME, YOUR HONOR. I WOULD LIKE AN
10 INSTRUCTION FOR COUNSEL. THE WITNESS IS TRYING TO ANSWER HIS
11 QUESTIONS. MR. KLEIN CONTINUES TO CUT HER OFF AND BE A LITTLE
12 BIT AGGRESSIVE AND RUDE. I THINK SHE IS A YOUNG LADY ON THE
13 STAND, AND I THINK HE CAN TAKE A LITTLE BIT DIFFERENT TACK.

14 MR. KLEIN: YOUR HONOR, I WOULD SUGGEST THE WITNESS IS
15 GOING WELL BEYOND THE QUESTIONS --

16 THE COURT: MR. KLEIN, LET THE WITNESS ANSWER YOUR
17 QUESTIONS. IF YOU ASK A QUESTION, LET THE WITNESS ANSWER. NOW
18 LET'S PROCEED.

19 MR. KLEIN: CAN YOUR HONOR INSTRUCT THE WITNESS.

20 THE COURT: PLEASE PROCEED.

21 MR. KLEIN: THANK YOU, YOUR HONOR.

22 Q. AM I CORRECT THAT YOUR FATHER TOLD YOU CERTAIN
23 THINGS ABOUT CHURCH UNIVERSAL FROM THE YEARS 1975 TO 1980?

24 A. YES, HE DID.

25 MR. LEVY: I'M GOING TO OBJECT TO THE QUESTION AS BEING
26 VAGUE AND AMBIGUOUS. WHAT ARE CERTAIN THINGS?

27 THE COURT: THE ANSWER CAN STAND.

28 Q. BY MR. KLEIN: AND HE TOLD YOU OTHER THINGS,

1 DIFFERENT THINGS ABOUT CHURCH UNIVERSAL AND TRIUMPHANT, ABOUT
2 LIFE THERE, ABOUT THE TEACHINGS AFTER HE LEFT IN 1980; IS THAT
3 RIGHT?

4 A. THEY WERE ADDITIONS.

5 Q. ADDITIONS. AND AS YOU SIT HERE NOW YOU CHOOSE TO
6 BELIEVE WHAT HE TOLD YOU SUBSEQUENT TO 1980 RATHER THAN WHAT HE
7 TOLD YOU IN 1975 TO 1980; IS THAT CORRECT?

8 A. ONE OF THE REASONS WHY WE WENT BACK EAST AND DID
9 THE VIDEOTAPING --

10 THE COURT: WAIT A MINUTE. I'M GOING TO ASK YOU TO
11 LISTEN TO THE QUESTION AND LIMIT YOUR ANSWER TO THE QUESTION
12 ASKED. WE WANT TO HEAR YOUR ANSWERS. BUT JUST ANSWER THE
13 QUESTIONS ASKED AND THEN WAIT FOR THE NEXT QUESTION.

14 THE WITNESS: OKAY.

15 THE COURT: I THINK THIS QUESTION CAN BE ANSWERED YES OR
16 NO.

17 THE WITNESS: COULD YOU PLEASE REPEAT IT AGAIN.

18 MR. KLEIN: YOUR HONOR, MAY THE REPORTER READ IT BACK,
19 PLEASE.

20 THE COURT: ALL RIGHT.

21 (QUESTION READ.)

22 THE WITNESS: YES.

23 Q. BY MR. KLEIN: WHEN YOU WERE GOING OVER TO THAT
24 DUMPSTER BEHIND VONS TO GET THE FOOD, WERE YOU DRIVING OVER
25 THERE IN A -- THE NEW TOYOTA THAT YOUR FATHER PURCHASED?

26 A. YES.

27 Q. HE HAD PURCHASE THAT TOYOTA ABOUT A MONTH BEFORE;
28 IS THAT RIGHT?

1 A. I GUESS IT WAS APPROXIMATELY IN THERE.

2 Q. YOU TALKED ABOUT THE PHONE CALLS THAT YOU RECEIVED
3 WHERE THE PERSON HUNG UP WHEN YOU ANSWERED THE PHONE. WERE YOU
4 PRESENT IN THE HOUSE WHEN THOSE OCCURRED?

5 A. YES.

6 Q. HOW MANY TIMES DID IT HAPPEN?

7 A. SOMETIMES IT OCCURRED EVERYDAY.

8 Q. AND WHEN YOU WOULD PICK UP THE PHONE NOBODY WOULD
9 SAY ANYTHING?

10 A. THIS IS CORRECT.

11 Q. DO YOU HAVE ANY BASIS FOR CONCLUDING THAT IT WAS A
12 CHURCH MEMBER THAT MADE THOSE PHONE CALLS?

13 A. THEY HAD NEVER OCCURRED BEFORE. BUT NO THERE WAS
14 NO CONCLUSIVE EVIDENCE. BUT THE PHONE CALLS IN OUR WHOLE LIFE
15 THIS HAD NEVER OCCURRED BEFORE SO NO THERE IS NO CONCLUSIVE
16 EVIDENCE BUT THAT IS WHAT OCCURRED.

17 Q. AND YOU SAID THAT PEOPLE WOULD WALK BY THE HOUSE
18 WHOM YOU DIDN'T KNOW AND THEY DIDN'T LOOK LIKE NEIGHBORS. .WHAT
19 DO NEIGHBORS LOOK LIKE?

20 MR. LEVY: I'M GOING TO OBJECT TO THE QUESTION, YOUR
21 HONOR. I THINK IT'S VAGUE, AMBIGUOUS --

22 THE COURT: SUSTAINED.

23 Q. BY MR. KLEIN: THE PEOPLE THAT WALKED BY YOUR
24 HOUSE DID YOU EVER RECOGNIZE ANY OF THEM AS BEING CHURCH
25 MEMBERS?

26 A. YES, I DID.

27 Q. WHO DID YOU RECOGNIZE AS BEING A CHURCH MEMBER
28 THAT WALKED BY YOUR HOUSE?

1 A. I DIDN'T KNOW THEM BY NAME, BUT I REMEMBER SEEING
2 A FEW FAMILIAR FACES.

3 Q. AND DID THE PEOPLE THAT YOU SAW WHO YOU RECOGNIZED
4 DID THEY DO ANYTHING?

5 A. NO. WHEN I USED TO SEE PEOPLE THAT I KNEW, SAY,
6 IN THE GROCERY STORE JUST AS AN ASIDE THEY WOULDN'T SPEAK TO ME
7 ANY MORE, PEOPLE THAT USED TO BE FRIENDS. AND I WOULD TRY TO
8 BE FRIENDLY WITH THEM SO THERE WAS A DEFINITE BARRIER BETWEEN
9 PEOPLE -- FRIENDS THAT WE HAD KNOWN BEFORE.

10 Q. TALKING ABOUT THE PEOPLE THAT WALKED BY THE HOUSE
11 WHO YOU RECOGNIZED HOW MANY TIMES DID SOMEONE WALK BY YOUR
12 HOUSE AND YOU RECOGNIZED FROM THE CHURCH?

13 A. PROBABLY ONLY ONCE OR TWICE.

14 Q. DID THEY CONTINUE WALKING DOWN THE BLOCK?

15 A. UH-HUH. BUT WE FELT THAT -- IT JUST MADE US FEEL
16 VERY NERVOUS.

17 Q. AM I CORRECT THAT NOBODY EVER -- NONE OF THESE
18 PEOPLE WHO WERE WALKING BY EVER STOPPED AND CAME TO YOUR HOUSE;
19 IS THAT CORRECT?

20 A. NOT THAT I REMEMBER, NO.

21 Q. WOULD IT BE A FAIR STATEMENT THAT A LOT OF CHURCH
22 MEMBERS LIVED IN THE WESTLAKE AREA WHERE YOUR FATHER LIVED?

23 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR, CALLS FOR
24 CONCLUSION.

25 THE COURT: SHE CAN ANSWER IF SHE KNOWS.

26 THE WITNESS: I DID KNOW, YES, THAT THERE WERE SOME THAT
27 LIVED IN THE WESTLAKE AREA.

28 Q. BY MR. KLEIN: WHEN YOU TALKED ABOUT THAT TRIP

1 THAT YOU AND YOUR FATHER MADE YOU SAID YOU WENT TO NEW JERSEY?

2 A. YES, WE DID.

3 Q. WHEN YOU WENT TO NEW JERSEY, DID YOU GO TO THE
4 HOUSE OF THE PARENTS OF ELIZABETH CLARE PROPHET?

5 A. YES, WE DID.

6 Q. WERE YOU GOING TO TRY AND VIDEOTAPE THEM IN ORDER
7 TO GET THEM TO LEAVE CHURCH UNIVERSAL TRIUMPHANT? WAS THAT THE
8 PURPOSE IN GOING THERE?

9 A. THEY WEREN'T MEMBERS OF THE CHURCH UNIVERSAL SO
10 NO.

11 Q. WHAT WAS THE PURPOSE IN GOING TO HER PARENTS
12 HOUSE?

13 A. WE WANTED TO JUST DISCOVER A LITTLE BIT MORE ABOUT
14 THE BACKGROUND OF ELIZABETH CLARE PROPHET.

15 Q. HOW OLD WERE HER PARENTS.

16 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR, RELEVANCE.

17 Q. BY MR. KLEIN: WERE HER PARENTS IN THEIR 80'S?

18 THE COURT: SHE CAN ANSWER.

19 THE WITNESS: THAT I DON'T REMEMBER.

20 Q BY MR. KLEIN: DID THEY SEEM TO BE QUITE ELDERLY?

21 A. YES, THEY WERE OLDER.

22 Q. DID YOU TELL THEM THAT YOU --

23 THE COURT: ELDERLY IS FROM THE VANTAGE POINT --

24 MR. KLEIN: I WON'T ARGUE THAT, YOUR HONOR.

25 THE COURT: I WON'T COMPLETE MY SENTENCE.

26 MR. KLEIN: I GET THE MESSAGE, YOUR HONOR.

27 THE COURT: GOOD.

28 Q. BY MR. KLEIN: DID EITHER YOU OR YOUR FATHER TELL

1 THE PARENTS OF ELIZABETH CLARE PROPHET THAT YOU WERE FRIENDS OF
2 HERS?

3 A. YES, I BELIEVE WE DID.

4 Q. WAS THAT THE TRUTH?

5 A. MY FATHER HAD BEEN FRIENDS WITH HER FOR ABOUT SIX
6 YEARS AND --

7 Q. SO AS FAR AS YOU'RE CONCERNED IT WAS THE TRUTH?

8 A. NOT ALL THE WAY.

9 Q. THIS HAPPENED IN 1981, RIGHT?

10 A. UH-HUH. YES.

11 Q. DID YOU ALSO STOP BY THE HOME OF THE PARENTS OF
12 MONROE SHEARER?

13 A. THAT I DON'T REMEMBER.

14 Q. YOU SAID THAT IN MONTANA A CHURCH MEMBER SAID THAT
15 YOUR FATHER WAS A HOMOSEXUAL. DID YOU RECOGNIZE THE CHURCH
16 MEMBER WHO SAID IT?

17 A. YEAH, I RECOGNIZED HER.

18 Q. WHAT'S HER NAME?

19 A. I DON'T WANT TO SAY FOR SURE BECAUSE I'M AFRAID
20 THAT IT MIGHT BE THE WRONG ONE. BUT I WOULD KNOW HER IF I --
21 YOU KNOW, IF I SAW HER. SO I KNEW HER BY FACE AND LIKE I SAID
22 I DON'T WANT TO GUESS AT HER NAME IF I WAS WRONG.

23 Q. YOU SAID THAT IN 1981, 1982, 1983 YOUR FATHER DID
24 NOT APPEAR TO BE IN GOOD SHAPE TO YOU?

25 A. THIS IS CORRECT.

26 Q. DURING THOSE YEARS WAS YOUR FATHER ENGAGED IN
27 ACTIVITIES RELATING TO CHURCH UNIVERSAL AND TRIUMPHANT?

28 A. WHAT DO YOU MEAN BY ACTIVITIES?

1 Q. WAS HE SPEAKING TO THE PRESS, TO THE MEDIA, TO
2 DIFFERENT ORGANIZATIONS ABOUT THE EVILS OF THE CHURCH AS HE SAW
3 THEM?

4 A. MY FATHER WAS BEING CONTACTED BY THESE PEOPLE AND
5 HE RESPONDED.

6 Q. AND DID HE SPEAK TO A NUMBER OF ORGANIZATIONS
7 ABOUT THE EVILS OF CHURCH UNIVERSAL AS HE SAW THEM.

8 MR. LEVY: OBJECTION, YOUR HONOR. VAGUE AS TO WHAT
9 NUMBER HE'S REFERRING TO.

10 THE COURT: SUSTAINED.

11 Q BY MR. KLEIN: DID HE SPEAK TO A NUMBER OF
12 ORGANIZATIONS ABOUT CHURCH UNIVERSAL AND TRIUMPHANT?

13 A. TO SOME. I DON'T KNOW WHAT YOU MEAN BY A NUMBER.

14 Q. DID HE SPEAK TO TV PEOPLE? DID HE APPEAR ON TV?

15 A. YES, THEY CONTACTED HIM.

16 Q. HE NEVER CONTACTED ANYBODY. THEY ALWAYS CONTACTED
17 HIM?

18 A. IT WAS A BACK AND FORTH THING. BUT AT THE VERY
19 BEGINNING THEY CONTACTED HIM.

20 Q. DID THERE COME A TIME WHEN HE BEGAN CONTACTING THE
21 MEDIA?

22 A. WHEN HE WOULD GET TO KNOW SOMEONE THEN THEY WOULD
23 HAVE CORRESPONDENCE BACK AND FORTH, YES.

24 Q. DID THERE COME A TIME WHEN HE WOULD CALL THE MEDIA
25 AND TELL THEM I WANT TO GIVE YOU A STORY ABOUT CHURCH UNIVERSAL
26 AND TRIUMPHANT?

27 A. HE MAY HAVE, YES. IN SUBSEQUENT YEARS. BUT NOT
28 AT THE BEGINNING.

1 Q. DESCRIBE THE INCIDENT WHERE YOUR FATHER WAS KICKED
2 OUT OF THE CHURCH, AS YOU PUT IT. HOW LONG AFTER THAT DID YOU
3 SEVER YOUR CONNECTION WITH THE CHURCH?

4 A. I DON'T THINK IT WAS ANY MORE THAN A MONTH. IT
5 WAS, SAY, LIKE A THREE-WEEK PERIOD, THREE OR FOUR WEEK PERIOD.

6 MR. KLEIN: THANK YOU. NO FURTHER QUESTIONS.

7 MR. MIDDLETON: MAY I HAVE A MOMENT, YOUR HONOR?

8 THE COURT: ALL RIGHT.

9 (CONFERENCE WITH MR. LEVY.)

10 MR. LEVY: JUST A FEW QUESTIONS MORE, MISS WITT.

11

12 REDIRECT EXAMINATION +

13 BY MR. LEVY:

14 Q. AFTER YOUR FATHER WAS KICKED OUT OF CHURCH
15 UNIVERSAL AND TRIUMPHANT WERE YOU STILL IN YOUR QUARTER AT THAT
16 TIME?

17 A. YES, I WAS.

18 Q. DID YOU DISCUSS WITH HIM WHETHER OR NOT TO
19 CONCLUDE YOUR QUARTER?

20 A. YES, I DID.

21 Q. WOULD YOU TELL THE COURT WHAT TRANSPIRED DURING
22 THAT DISCUSSION.

23 A. HE FELT THAT I SHOULD STAY AND FINISH UP MY
24 QUARTER. WHEN MY FATHER LEFT C.U.T. HE WASN'T SURE WHETHER
25 ELIZABETH CLARE PROPHET WAS STILL THE MESSENGER OF THE
26 ASCENDING MASTERS OR NOT AND HE THOUGHT THAT MAYBE SHE WAS
27 STILL THE MESSENGER AND THAT MAYBE THERE WAS SOME GOINGS ON IN
28 THE CULT THAT WEREN'T ON THE UP AND UP BUT MAYBE SHE WAS STILL

1 THE MESSENGER. HE WASN'T CLEAR IN HIS MIND WHAT WAS REAL AND
2 WHAT WASN'T SO HE FELT I SHOULD PROBABLY STAY ON AND FINISH MY
3 QUARTER. THEN WHEN I DID LEAVE --

4 MR. KLEIN: I'M GOING TO OBJECT, YOUR HONOR. I THINK
5 IT'S BEYOND THE QUESTION AT THIS TIME.

6 THE COURT: TIME FOR ANOTHER QUESTION.

7 Q. BY MR. LEVY: WITH REGARD TO DECREES OR PRAYING,
8 EITHER TERM YOU'RE COMFORTABLE USING, WERE YOU TAUGHT WHEN YOU
9 ATTENDED SUMMIT UNIVERSITY THAT DECREES COULD BE USED AGAINST
10 PEOPLE?

11 A. YES, I WAS.

12 Q. WAS THAT SOME OF THE BOLTS AND BLUE LIGHTENING AND
13 BLUE FLAME AND PALMS AND P. S., WHATEVER YOU WANT TO CALL IT?

14 A. YES.

15 Q. WOULD THAT BE DIRECTED AGAINST PEOPLE?

16 A. YES.

17 Q. DID YOUR FATHER BELIEVE THAT TO YOUR KNOWLEDGE?

18 A. HE BELIEVED IT VERY STRONGLY AT THE TIME WHEN HE
19 LEFT.

20 MR. LEVY: THANK YOU.

21 I HAVE NOTHING FURTHER, YOUR HONOR, OF THIS
22 WITNESS.

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

24 THE COURT: ALL RIGHT.

25 (COUNSEL TALKS TO CLIENT.)

26 MR. KLEIN: NO FURTHER QUESTIONS, YOUR HONOR.

27 THE COURT: OKAY. THANK YOU. YOU ARE EXCUSED.

28 MR. LEVY: YOUR HONOR, MAY THIS WITNESS REMAIN IN THE

1 COURTROOM, IF SHE SO CHOOSES, IF MR. KLEIN DOES NOT INTEND TO
2 CALL HER AGAIN.

3 THE COURT: I EXPECT THAT'S AGREEABLE.

4 MR. KLEIN: YES, YOUR HONOR.

5 MR. LEVY: AT THIS TIME, YOUR HONOR, WE WOULD CALL MR.
6 DAVID PASSEGER.

7 THE COURT: ALL RIGHT. WE WILL TAKE OUR -- ALL RIGHT.
8 GET HIM STARTED NOW. WE WILL GET STARTED; IN A FEW MINUTES
9 TAKE OUR RECESS.

10 MR. LEVY: OKAY.

11

12 DAVID PASSEGER, +
13 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
14 AS FOLLOWS:

15 THE CLERK: PLEASE BE SEATED IN THE WITNESS STAND. SIR,
16 PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR
17 FIRST AND LAST NAME.

18 THE WITNESS: MY NAME IS DAVID PASSEGER, D-A-V-I-D.
19 LAST NAME IS P-A-S-S-E-G-E-R.

20

21 DIRECT EXAMINATION +

22 BY MR. LEVY:

23 Q. MR. PASSEGER, DO YOU KNOW GREGORY MULL?

24 A. YES, I DO.

25 Q. WHEN DID YOU FIRST MEET HIM?

26 A. I MET MR. MULL IN DECEMBER OF 1977.

27 Q. WHERE DID YOU MEET HIM?

28 A. I MET HIM AT A SATURDAY NIGHT SERVICE IN THE

1 CHURCH.

2 Q. WHICH CHURCH?

3 A. CHURCH UNIVERSAL AND TRIUMPHANT.

4 Q. DID YOU EVER RENT PROPERTY FROM MR. MULL?

5 A. YES, I DID.

6 Q. AND WHERE DID YOU RENT PROPERTY FROM HIM?

7 A. I RENTED AN APARTMENT FROM HIM ON CASSELLI STREET
8 IN SAN FRANCISCO.

9 Q. ARE YOU FAMILIAR WITH WHAT HAS BEEN TERMED C.U.T.
10 OR THAT'S THE NEW MONIKER FOR CHURCH UNIVERSAL AND TRIUMPHANT?

11 A. YES, I AM.

12 Q. WHO FIRST INTRODUCED YOU TO THAT CHURCH?

13 A. I WAS INTRODUCED BY A POSTER ON THE TELEPHONE
14 POLE.

15 THE COURT: PLEASE KEEP YOUR VOICE UP SO WE CAN ALL
16 HEAR.

17 Q. BY MR. LEVY: DID YOU BECOME INVOLVED WITH THAT
18 CHURCH?

19 A. YES, I DID.

20 Q. AND WHAT WERE THE CIRCUMSTANCES OF YOUR BEING --
21 BECOMING INVOLVED WITH CHURCH UNIVERSAL AND TRIUMPHANT?

22 A. AFTER READING THE POSTER, I ATTENDED A WEEKEND
23 SEMINAR IN SAN FRANCISCO.

24 Q. WHAT WAS YOUR RELIGIOUS BACKGROUND BEFORE YOU GOT
25 INVOLVED WITH CHURCH UNIVERSAL AND TRIUMPHANT?

26 A. UNTIL I WAS ABOUT 20 I WAS A BAPTIST. AFTER THAT
27 I BECAME INTERESTED IN EASTERN RELIGIONS.

28 Q. DID YOU ATTEND SUMMIT UNIVERSITY --

1 A. YES, I DID.

2 Q. -- OF CHURCH UNIVERSAL AND TRIUMPHANT?

3 A. YES, I DID.

4 Q. PRIOR TO ATTENDING SUMMIT UNIVERSITY, DID YOU
5 ATTEND ANY CONFERENCES THAT WERE HELD BY THE CHURCH?

6 A. YES, I DID.

7 Q. AND WHERE WERE THOSE CONFERENCES HELD AT?

8 A. IN PASADENA.

9 Q. WAS MR. MULL EVER PRESENT AT THOSE CONFERENCES?

10 A. YES, HE WAS.

11 Q. WERE YOU ABLE TO OBSERVE HOW MR. MULL WAS TREATED
12 BY CHURCH MEMBERS?

13 A. YES, I WAS.

14 Q. COULD YOU RELATE TO US THE WAY PEOPLE CONNECTED
15 WITH THE CHURCH RESPONDED TO MR. MULL?

16 A. EVERYONE SEEMED TO KNOW HIM. THEY KNEW HIM ON A
17 FIRST NAME BASIS. THEY WOULD COME UP AND GREET HIM, SHAKE HIS
18 HAND, ASK HIM HOW HE WAS DOING.

19 Q. DID MR. MULL AT THAT TIME TO YOUR KNOWLEDGE KNOW
20 ELIZABETH CLARE PROPHET?

21 A. I'M SORRY. WOULD YOU REPEAT THE QUESTION.

22 Q. YEAH. DID MR. MULL TO YOUR KNOWLEDGE WHEN YOU
23 WENT TO THE CONFERENCE KNOW MISS ELIZABETH CLARE PROPHET?

24 A. YES, SIR, HE DID.

25 Q. DID YOU EVER HAVE A DIALOGUE WITH MR. MULL AND
26 MISS PROPHET AND YOURSELF?

27 A. AT THE END OF THE DAY AT ONE OF THE CONFERENCES
28 MR. MULL INTRODUCED ME TO MRS. PROPHET.

1 Q. DID IT APPEAR LIKE THEY WERE FRIENDS TO YOU?

2 A. SHE GREETED HIM ON A FIRST NAME BASIS.

3 Q. AT THAT CONFERENCE AND WHEN YOU FIRST KNEW MR.
4 MULL HOW DID HE APPEAR TO YOU PHYSICALLY AND EMOTIONALLY?

5 A. HE WAS PHYSICALLY SOUND, SEEMED VERY POSITIVE,
6 VERY ENTHUSIASTIC ABOUT TEACHINGS AND VERY MUCH A PROFESSIONAL
7 DEMEANOR, WAS ALWAYS DRESSED WELL. SEEMED TO HAVE A VERY
8 SUCCESSFUL BUSINESS. SO IN GENERAL HE WAS A VERY HAPPY PERSON,
9 VERY CONFIDENT ABOUT HIMSELF AND ABOUT HIS INVOLVEMENT WITH THE
10 CHURCH.

11 Q. AND YOU TOLD US THAT YOU ATTENDED SUMMIT
12 UNIVERSITY. WHEN DID YOU ATTEND SUMMIT UNIVERSITY?

13 A. IN FALL OF 1978.

14 Q. AND WHERE DID YOU ATTEND SUMMIT UNIVERSITY?

15 A. IT WAS AT -- IN MALIBU AT CAMELOT.

16 Q. CAN YOU TELL US VERY BRIEFLY WHAT KIND OF DAILY
17 SCHEDULE YOU HAD WHEN YOU ATTENDED SUMMIT UNIVERSITY.

18 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO RELEVANCE
19 IF THAT -- IT'S 1978 WHEN MR. MULL WAS NEITHER AT CAMELOT NOR
20 SUMMIT UNIVERSITY.

21 THE COURT: OVERRULE.

22 HE CAN ANSWER.

23 THE WITNESS: WE SPENT THE NIGHTS AT A CAMP
24 APPROXIMATELY -- I'M NOT SURE OF THE MILEAGE -- IT WAS ABOUT A
25 45-MINUTE BUS RIDE FROM CAMELOT. WE WERE BUSED IN EACH MORNING
26 AT 7 O'CLOCK. WE HAD A HALF HOUR OF DECREERING THEN AN HOUR
27 BREAK FOR BREAKFAST WHEN WE WERE EATING, THEN WE WOULD RETURN
28 TO THE CLASSROOM AROUND 8:30, LISTEN TO AND WATCH VIDEOTAPES

1 UNTIL APPROXIMATELY NOON AND THEN WE HAD ONE HOUR BREAK FOR
2 LUNCH THEN WE WOULD RETURN TO THE CLASSROOM FOR -- OR THE
3 CHAPEL FOR HALF HOUR TO TWO HOURS OF MORE DECREERING. THEN WE
4 LISTENED TO MORE VIDEOTAPES, THEN A DINNER BREAK AND UP UNTIL
5 ABOUT THE MIDPOINT OF THE QUARTER WE WOULD USUALLY RETURN TO
6 THE CAMP AND DO OUR HOMEWORK, GENERALLY GETTING INTO BED ABOUT
7 11 OR 12.

8 AFTER ABOUT THE MIDPOINT, WE STARTED GETTING
9 BEHIND IN THE STUDIES SO WE GENERALLY STAYED AT CAMELOT DURING
10 THE EVENING AS WELL, USUALLY GETTING BACK TO CAMP MAYBE ONE OR
11 TWO THEN WE WOULD BE BACK UP AGAIN AT ABOUT 5:15 READY FOR THE
12 NEXT DAY.

13 Q. WHILE YOU WERE AT SUMMIT UNIVERSITY WAS THERE SOME
14 KIND OF REGIMENT WITH REGARD TO DIET AND FASTING AND DECREERING?

15 A. THE SECOND WEEK WE WENT ON A THREE-DAY APPLE JUICE
16 FAST, JUST NOTHING BUT APPLE JUICE FOR THREE DAYS. FOLLOWING
17 THAT WE WERE ON A DIET OF RAW VEGETABLES AND FRUIT.

18 Q. DID THIS FASTING AND THE DECREERING AND THESE LONG
19 HOURS DID THEY HAVE ANY PHYSICAL EFFECT ON YOU?

20 A. I WAS -- I FELT PHYSICALLY TIRED, MENTALLY SPACED
21 OUT, VERY EMOTIONAL AND I FELT VERY MUCH -- THE PROPER WORD I
22 FELT VERY MUCH ALONE AND CUT OFF.

23 Q. COULD YOU HAVE GOTTEN UP AND WALKED OUT ANY TIME
24 YOU WANTED TO?

25 A. YES, I COULD.

26 Q. WAS THERE ANYTHING THAT KEPT YOU THERE?

27 A. PHYSICALLY, NO. WHAT KEPT ME THERE WAS THE
28 CONVICTION THAT I WAS IN DIRECT CONTACT WITH GOD, THAT THE HOLY

1 SPIRIT WAS THERE PHYSICALLY AND THAT IF I LEFT I WOULD BE
2 LETTING DOWN GOD AND MYSELF AND THAT IT WOULD TAKE ME ANOTHER
3 10,000 YEARS TO GET BACK TO THAT POINT AGAIN.

4 Q. WHO TOLD YOU IT WOULD TAKE YOU 10,000 YEARS TO GET
5 BACK TO THAT POINT?

6 A. MRS. PROPHET IN THE VIDEOTAPES.

7 Q. DID SHE TELL YOU ANYTHING ELSE, IF YOU DIDN'T
8 COMPLETE YOUR COMMITMENT WHAT WOULD HAPPEN OR COULD HAPPEN?

9 A. GENERALLY THAT AN OPPORTUNITY LIKE THIS ONLY COMES
10 ALONG EVERY 10,000 YEARS; IF YOU DON'T TAKE ADVANTAGE OF THE
11 OPPORTUNITY NOW YOU WILL HAVE TO WAIT FOR ANOTHER 10,000 YEARS
12 BEFORE THE OPPORTUNITY PRESENTS ITSELF AGAIN. THAT'S GENERALLY
13 ALL I CAN RECALL.

14 Q. DO YOU KNOW WHAT A CLEARANCE LETTER IS?

15 A. YES, I DO.

16 Q. WHAT IS A CLEARANCE LETTER?

17 A. A CLEARANCE LETTER IS WHEN YOU LIST ALL OF YOUR
18 SINS THAT YOU EVER COMMITTED THAT YOU CAN REMEMBER,
19 SPECIFICALLY THE NAMES OF ANYONE YOU HAVE HAD SEXUAL RELATIONS
20 WITH, WHAT DRUGS YOU HAVE TAKEN, ANYTHING YOU CAN THINK OF
21 THAT -- THEY WERE VERY GENERAL ABOUT THE INSTRUCTION BUT IT WAS
22 GENERALLY ANYTHING YOU CAN THINK OF THAT THE TEACHINGS DIDN'T
23 APPROVE OF AND THE ACTIONS THAT YOU COMMITTED UP TO THAT POINT
24 AND TIME BEFORE YOU CAME INTO THE TEACHINGS.

25 Q. WHAT WERE YOU TOLD WOULD BE DONE WITH YOUR
26 CONFESSION LETTER ONCE YOU HAD WRITTEN IT?

27 A. I WAS TOLD THAT MRS. PROPHET WOULD GATHER THEM
28 TOGETHER IN A BASKET AND THAT THE SINS LISTED IN THE LETTERS BE

1 FORGIVEN AND THAT THE LETTERS WOULD BE BURNED.

2 Q. DID YOU MEET A DR. RALPH YANEY WHILE YOU WERE
3 ATTENDING SUMMIT UNIVERSITY?

4 A. YES, I DID.

5 Q. WOULD YOU TELL US BRIEFLY YOUR EXPERIENCE WITH
6 HIM.

7 A. I WAS HAVING SOME EMOTIONAL PROBLEMS AND WANTING
8 TO LEAVE AND YET WANTING TO STAY AND THE CONFLICT REACHED SUCH
9 A POINT THAT THE INSTRUCTOR FOR THE QUARTER TOOK ME TO DR. YANEY
10 WHOM I THEN BEGAN SEEING ONE HOUR A WEEK. THE COUNSELING -- I
11 DIDN'T GET MUCH OUT OF THE COUNSELING AS DR. YANEY SEEMED TO BE
12 VERY PASSIVE. HE WOULD SIT THERE AND WAIT FOR ME TO SAY
13 SOMETHING AND THEN COUNSELED ME AS TO WHAT PSYCHOLOGICALLY WAS
14 OCCURRING WITHIN ME WITHIN THE TERMS OF THE TEACHINGS AND WHY I
15 WAS HAVING PROBLEMS.

16 Q. IN YOUR OPINION WAS DR. YANEY ATTEMPTING TO KEEP
17 YOU WITHIN THE CHURCH GROUP?

18 A. OH, DEFINITELY. .

19 Q. DID YOU FINISH YOUR QUARTER AT SUMMIT UNIVERSITY?

20 A. YES, I DID.

21 Q. DID YOU RETURN HOME AFTER THE QUARTER?

22 A. I HAD BURNED MY BRIDGES BEHIND ME AT THAT POINT
23 AND SINCE I WAS -- DIDN'T HAVE ANY MONEY OR A JOB I RETURNED
24 AND STAYED WITH MR. MULL IN SAN FRANCISCO.

25 THE COURT: LET'S TAKE OUR MORNING RECESS AT THIS TIME.
26 WE WILL RESUME IN 15 MINUTES.

27 (RECESS.)

28 THE COURT: PLEASE PROCEED.

1 MR. LEVY: THANK YOU.

2 Q. MR. PASSEGER, WE WERE TALKING ABOUT YOUR TIME AT
3 SUMMIT UNIVERSITY. YOU TOLD US ABOUT LONG HOURS AND YOU TOLD
4 US ABOUT DECREEEING. WERE YOU REQUIRED TO FAST WHILE YOU WERE
5 THERE?

6 A. YES, I WAS.

7 Q. WERE YOU REQUIRED AS PART OF THAT TIME TO TAKE
8 ENEMAS AND COLONICS?

9 A. YES, WE HAD ONE FAST DAY A WEEK ON SATURDAYS AND
10 WE WERE ASKED TO TAKE ENEMAS ONCE A WEEK AT THE MINIMUM.

11 Q. WHERE WAS THE FACILITY THAT YOU WERE SUPPOSED TO
12 BE TAKING THESE ENEMAS IN CONSIDERATION OF WHERE YOU LIVED AND
13 SLEPT.

14 MR. KLEIN: OBJECT AS TO THE RELEVANCE, YOUR HONOR.

15 THE COURT: OVERRULED.

16 THE WITNESS: WE WOULD GENERALLY TAKE -- THE ENEMAS
17 UP TO US.

18 THE COURT: I'M GOING TO ASK YOU TO KEEP YOUR VOICE UP.
19 PROJECT, PLEASE.

20 A. WE WEREN'T TAKING THE ENEMAS. IT WAS UP TO
21 WE GENERALLY TOOK THEM AT THE CAMP. THERE WERE 14 MEN TO A
22 CABIN, AND I DON'T REMEMBER HOW MANY TOILETS THERE WERE. BUT
23 GENERALLY IT WAS IN THE EVENING.

24 Q. WERE THE FACILITIES FOR TAKING THESE ENEMAS AND
25 COLONICS SEPARATED FROM WHERE YOUR SLEEPING QUARTERS WERE?

26 A. THE BEST CAN I DESCRIBE IT IS THAT THE CABIN WAS A
27 CABIN WITH CEMENT FLOOR WITH A LATRINE ADJOINING IT IN THE SAME
28 BUILDING. THERE WAS A DOORWAY FROM THE SLEEPING QUARTERS INTO

1 THE LATRINE.

2 Q. WHERE WAS YOUR PARTICULAR BED IN THAT CABIN WITH
3 RELATIONSHIP TO WHERE THESE PEOPLE WOULD BE TAKING THESE
4 ENEMAS?

5 MR. KLEIN: AGAIN I OBJECT AS TO THE RELEVANCE, YOUR
6 HONOR.

7 THE COURT: OVERRULE.

8 THE WITNESS: MY BUNK WAS LOCATED RIGHT AT THE DOORWAY
9 TO THE LATRINE.

10 Q. DID YOU FIND THAT UNPLEASANT?

11 A. I GOT USED TO IT. IT WAS UNPLEASANT AT FIRST.
12 SOME OF THE MEN WERE TAKING ENEMAS EVERY NIGHT AND SINCE WE GOT
13 BACK TO THE CABIN LATE, 12 OR 1 O'CLOCK, SOMETIMES I WAS -- YOU
14 ARE LISTENING TO TOILETS FLUSHING HALFWAY THROUGH THE NIGHT.

15 Q. IF IT WAS UNPLEASANT TO YOU WHY DIDN'T YOU LEAVE?

16 A. I DECIDED AT THE TIME THAT THIS WAS A TEST OF MY
17 DEDICATION TO THE GURU AND TO THE MASTERS.

18 Q. WHILE YOU WERE AT SUMMIT WERE YOU APPROACHED TO
19 BECOME PERMANENT STAFF?

20 A. NOT PERMANENT STAFF AS I UNDERSTOOD IT AT THE
21 TIME. THE DAY BEFORE THE END OF THE QUARTER I WAS CALLED TO
22 MONROE SHEARER'S OFFICE AND HE ASKED ME IF I WOULD COME ON
23 STAFF IN THE FUNCTION OF TRANSLATING THE TEACHINGS INTO
24 RUSSIAN.

25 Q. YOU SPEAK RUSSIAN OR WRITE RUSSIAN?

26 A. YES, I DO.

27 Q. WERE YOU APPROACHED AT ANY OTHER TIMES ABOUT
28 BECOMING STAFF?

1 A. NOT ON A PERSONAL BASIS, NO. THIS WAS THE ONLY
2 INCIDENT. MOST OF THE TIME OR ALL OF THE TIME IN FACT BESIDES
3 THAT INCIDENT IT WAS ON THE VIDEOTAPES AND LECTURES ABOUT NOW
4 THAT YOU'RE AT SUMMIT THE NEXT STEP AND COMMITMENT TO THE
5 MASTERS IS JOINING PROBATIONARY STAFF.

6 Q. DID YOU KNOW WHAT JOINING PERMANENT STAFF
7 ENTAILED?

8 A. PERMANENT STAFF, YES THAT WAS WHERE YOU SIGN OVER
9 ALL YOUR BELONGINGS, ALL YOUR POSSESSIONS TO THE CHURCH AND
10 BECOME A FULL TIME STAFF MEMBER.

11 Q. BEFORE YOU TOLD US THAT YOU WENT TO SUMMIT
12 UNIVERSITY AND THEN AFTER YOU LEFT YOU MOVED BACK TO SAN
13 FRANCISCO; IS THAT CORRECT?

14 A. YES, IT IS.

15 Q. WHEN YOU MOVED BACK TO SAN FRANCISCO YOU RESIDED
16 WITH MR. MULL?

17 A. YES. I DID.

18 Q. DID YOU REMAIN LIVING IN SAN FRANCISCO THEREAFTER?

19 A. YES, I DID.

20 Q. WAS THERE A TIME YOU MOVED TO LOS ANGELES?

21 A. YES. I LEFT SUMMIT IN DECEMBER OF '78 AND I
22 RELOCATED DOWN TO LOS ANGELES IN APPROXIMATELY OCTOBER OF '79.

23 Q. WHEN YOU CAME DOWN TO LOS ANGELES DID YOU HAVE THE
24 OCCASION TO VISIT CAMELOT?

25 A. YES, EVERY WEEKEND.

26 Q. WHAT DID YOU DO WHEN YOU WENT THERE?

27 A. I WENT TO THE SATURDAY NIGHT SAINT GERMAINE
28 SERVICE, SOMETIMES TO THE FRIDAY NIGHT SERVICE AND ON OCCASIONS

1 WE HAD NIGHT SERVICES WHICH WAS DOWNTOWN, LOCATED AT THE
2 MANSION DOWNTOWN.

3 Q. WHEN YOU VISITED CAMELOT AFTER YOU MOVED DOWN TO
4 THIS AREA IN 1979 DID YOU EVER HAVE OCCASION TO SEE GREGORY
5 MULL AT CAMELOT?

6 A. YES, I SAW HIM QUITE OFTEN. AT THE TIME I WAS
7 NOW -- HAD NOW DECIDED I WANTED TO JOIN THE STAFF AND MY
8 REQUESTS WERE UNANSWERED. I KEPT WRITING LETTERS AND TALKING
9 TO SOME OF THE STAFF PEOPLE AND THEY SAID THEY WOULD GET AROUND
10 TO IT. GREGORY WAS THEN WORKING IN MY BEHALF TO TALK TO THE
11 HIERARCHY IN THE CHURCH THAT I MIGHT BE ALLOWED TO JOIN THE
12 STAFF AND SO WE WERE COMMUNICATING BACK AND FORTH ABOUT THAT,
13 AND I WOULD ALSO SEE HIM AT THE SERVICES.

14 Q. YOU TOLD US BEFORE THAT WHEN YOU KNEW HIM IN SAN
15 FRANCISCO HE WAS PHYSICALLY ACTIVE, HE LOOKED PROFESSIONAL AND
16 SEEMED SOMEWHAT WORLDLY. WHEN YOU SAW HIM AT CAMELOT IN 1979,
17 LET'S SAY TOWARD THE END OF THE YEAR IN 1979, HOW DID HE APPEAR
18 TO YOU?

19 A. HE SEEMED AGITATED, VERY NERVOUS. HE WASN'T
20 SMILING VERY MUCH ANYMORE. HE SEEMED TO HAVE LOST SOME OF HIS
21 SELF-CONFIDENCE. THERE JUST SEEMED TO BE A GENERAL CHANGE IN
22 HIS DEMEANOR. USUALLY BEFORE HE WOULD JUST COME UP AND SLAP
23 YOU ON THE BACK AND HUG YOU, HOW ARE YOU DOING, IT'S NICE TO
24 SEE YOU AND ABOUT THIS TIME HE -- THE ENERGY JUST SEEMED TO
25 HAVE GONE OUT OF HIM.

26 Q. DID YOU HAVE AN OCCASION TO VISIT WITH GREGORY
27 MULL DURING, SAY, THE MID 1980'S?

28 A. AFTER I WAS ACCEPTED AS A STAFF MEMBER -- BEFORE I

1 WAS ACCEPTED AS A STAFF MEMBER IN 1980, I HAD AN APARTMENT IN
2 THE SAN FERNANDO VALLEY AND I WAS WORKING FULL TIME AT A JOB IN
3 PREPARATION FOR GOING ON STAFF. I MOVED INTO GREGORY'S
4 CONDOMINIUM IN WESTLAKE TO -- AS A FORM OF PROTECTION AGAINST
5 ANY OPPOSITION THAT MIGHT ARISE TO MY BECOMING A STAFF MEMBER.
6 SO I SAW HIM ON A DAILY BASIS THEREAFTER.

7 Q. DID YOU HAVE ANY OCCASION TO DISCUSS WITH GREGORY
8 MULL YOUR PERSONAL DECISION TO GO ON STAFF?

9 A. IF IT HADN'T BEEN FOR GREGORY, I WOULDN'T HAVE
10 GOTTEN TO THAT POINT OF EVEN DISCUSSING IT. GREGORY HAD BEEN
11 ENCOURAGING ME TO APPLY FOR STAFF SINCE I HAD BEEN OUT OF
12 SUMMIT, ALTHOUGH HE WAS VERY GENERAL ABOUT IT BECAUSE I WAS NOT
13 PSYCHOLOGICALLY READY TO DO IT. BUT OVER THAT PERIOD OF THAT
14 YEAR I DISCOVERED THAT I WAS BEGINNING TO SLIP OUT OF THE
15 TEACHINGS BEING ON MY OWN IN THE OUTSIDE WORLD AND SINCE I
16 DIDN'T WANT TO GET OUT OF THE TEACHINGS I FELT I NEEDED TO BE
17 NEAR CAMELOT AND THAT'S WHEN GREGORY HELPED ME MOVE DOWN TO LOS
18 ANGELES AND TALKED TO ME EVERY COUPLE DAYS TO SEE HOW I WAS
19 DOING AND THEN ARRANGED WITH THE HIERARCHY FOR ME TO BE
20 INTERVIEWED FOR STAFF SINCE I HADN'T BEEN ABLE TO GET IN TOUCH
21 WITH THEM ON MY OWN.

22 Q. DID YOU EVER BECOME AWARE THAT GREGORY MULL HAD
23 BEEN ASKED TO LEAVE OR KICKED OUT OF CAMELOT?

24 A. THE FIRST TIME I HEARD ABOUT IT WAS -- WELL, I HAD
25 BEEN AT CAMELOT FOR A SUNDAY SERVICE AND I WAS INFORMED THAT MY
26 ANNUAL INTERVIEW AS A KEEPER OF THE FLAME WAS DUE. SOMEBODY --
27 ONE OF THE STAFF MEMBERS SAT ME DOWN ON THE GRASS OUTSIDE THE
28 CHAPEL AND BEGAN READING OFF A -- WHAT I SUBSEQUENTLY CALLED A

1 SIN LIST SAYING HAVE YOU EVER DONE ANY OF THE FOLLOWING IN THE
2 LAST SIX MONTHS, SIMILAR TO WHAT YOU FILL OUT FOR HEALTH
3 INSURANCE AND IT'S LIKE A LITTLE COMPUTERIZED FORM WITH A LIST
4 OF ALL THE SINS AND YOU JUST CHECK THEM OFF YES OR NO. AT THAT
5 POINT SOMETHING SNAPPED WITHIN ME AND I BEGAN TO LOOK AROUND AT
6 THE CHURCH AND HAD VERY SERIOUS MISGIVINGS.

7 A COUPLE OF DAYS LATER I APPROACHED GREGORY AGAIN
8 ABOUT THIS AND HE COUNSELED ME FOR ABOUT THREE HOURS THAT
9 AFTERNOON SAYING THAT THIS WAS A TEST, THIS WAS AN INITIATION,
10 I HAD TO OVERCOME IF I WANTED TO MAKE IT IN THE TEACHING. SO I
11 REMAINED IN A QUANDRY FOR THE FOLLOWING WEEK TRYING TO DECIDE
12 WHAT I WAS GOING TO -- WHETHER I WAS GOING TO STAY IN THE
13 TEACHINGS OR GET OUT COMPLETELY, NO LONGER JUST A QUESTION OF
14 BEING A STAFF MEMBER.

15 ABOUT A WEEK AFTER I TALKED WITH GREGORY I
16 RECEIVED A LETTER IN THE MAIL --

17 MR. KLEIN: I WOULD JUST OBJECT. I THINK IT'S BECOMING
18 A NARRATIVE AT THIS POINT.

19 THE COURT: TIME FOR ANOTHER QUESTION.

20 MR. LEVY: THANK YOU, YOUR HONOR.

21 Q. DID YOU MEET WITH GREGORY BEFORE YOU WENT TO GO ON
22 STAFF, IMMEDIATELY BEFORE YOU WENT?

23 A. YES, I DID.

24 Q. WAS GREGORY STILL AT THAT TIME SUPPORTIVE OF THE
25 CHURCH? DO YOU RECALL? THIS IS AFTER THE TIME HE HAD BEEN
26 ASKED TO LEAVE?

27 A. I'M SORRY. I LOST THE QUESTION.

28 Q. YOU JUST TESTIFIED THAT YOU HAD A MEETING WITH MR.

1 MULL AFTER HE HAD BEEN ASKED TO LEAVE THE CHURCH?

2 A. NO. THIS WAS BEFORE.

3 Q. DID YOU HAVE ANY MEETINGS WITH HIM AFTER HE HAD
4 BEEN ASKED TO LEAVE THE CHURCH?

5 A. NOT FOR SEVERAL WEEKS. AS I SAID I RECEIVED A
6 LETTER IN THE MAIL FROM HIM INFORMING ME THAT HE HAD RESIGNED
7 FROM THE CHURCH.

8 Q. AT THAT PERIOD OF TIME WAS HIS ATTITUDE TO YOUR
9 KNOWLEDGE STILL FAVORABLE ABOUT THE CHURCH?

10 A. I DIDN'T HAVE MUCH CONTACT WITH HIM IN THOSE FEW
11 WEEKS FOLLOWING.

12 Q. WHAT I AM TRYING TO FIND OUT IS IF MR. MULL TO
13 YOUR KNOWLEDGE STILL BELIEVED AND TRUSTED IN ELIZABETH CLARE
14 PROPHET?

15 A. NOT WHEN I GOT THE LETTER HE DIDN'T.

16 Q. DID YOU GET THE LETTER BEFORE OR AFTER MR. MULL
17 HAD HIS TWO AND HALF HOUR FINAL MEETING WITH THE CHURCH?

18 A. AFTERWARD.

19 Q. DID YOU DISCUSS WITH MR. MULL BEFORE HE WENT TO
20 THAT TWO AND A HALF HOUR MEETING HIS FEELINGS ABOUT THE CHURCH?

21 A. I BELIEVE IT WAS ONE OR TWO DAYS BEFORE THAT
22 MEETING THAT HE COUNSELED ME ABOUT STAYING WITHIN THE CHURCH.

23 Q. DID YOU STAY IN CONTACT WITH MR. MULL THEREAFTER?

24 A. YES, I DID ON AN INTERMITTENT BASIS.

25 Q. DID YOU BECOME AWARE EVENTUALLY THAT HE HAD A
26 STROKE?

27 A. YES, I DID.

28 Q. OR A STROKE LIKE INCIDENT?

1 A. YES.

2 Q. COULD YOU COMPARE YOUR VIEW OF GREGORY MULL WHEN
3 YOU FIRST KNEW HIM AND PRIOR TO THE TIME THAT HE HAD THAT
4 STROKE?

5 A. I WOULD SAY BEFORE HE WAS VERY PROFESSIONAL
6 DEMEANOR, A VERY SUCCESSFUL ARCHITECT, VERY CONFIDENT ABOUT THE
7 TEACHINGS, HE WAS MY WINDOW INTO THE CHURCH, SO TO SPEAK, AND I
8 DOUBT IF I WOULD HAVE STAYED IN WITHOUT GREGORY. AFTER THE
9 STROKE IT JUST SEEMED -- SOMETHING SEEMED TO BE BROKEN AS IF HE
10 HAD LOST THE THING HE TREASURED MOST.

11 Q. WHILE YOU WERE AT CAMELOT, DID YOU EVER HEAR YOUR
12 HIERARCHS USE CHARACTER ASSASSINATION OR BELITTLEMENT OF
13 PEOPLE?

14 A. YES. ANYONE THAT HAD LEFT THE TEACHINGS THAT THEY
15 WISH TO CALL ATTENTION TO. IN PARTICULAR ON ONE OCCASION IN
16 THE EARLY PART OF MY QUARTER --

17 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. HE'S GOING
18 BEYOND THE QUESTION.

19 THE COURT: IT'S TIME FOR ANOTHER QUESTION.

20 Q. BY MR. LEVY: DO YOU KNOW WHY THE CHARACTER
21 ASSASSINATION AND BELITTLEMENT TECHNIQUE WAS USED?

22 MR. KLEIN: I'M GOING TO OBJECT. CALLS FOR A CONCLUSION
23 ON THE PART OF THE WITNESS.

24 THE COURT: SUSTAINED.

25 Q. BY MR. LEVY: WHAT KIND OF EFFECT ON YOU DID THE
26 CHARACTER ASSASSINATION AND BELITTLEMENT TECHNIQUE HAVE?

27 A. I HAD THE FEELING I HAD BETTER STAY THERE.

28 Q. WERE YOU EVER TOLD WHAT WOULD HAPPEN TO YOU IF YOU

1 WENT AGAINST THE DIRECTIVES OF ELIZABETH CLARE PROPHET?

2 A. IT'S TANTAMOUNT TO DISOBEYING GOD.

3 Q. AFTER YOU LEFT THE CHURCH, DID YOU WRITE A LETTER
4 WITH REGARD TO YOUR ATTITUDES AND FEELINGS ABOUT THE EVENTS
5 THAT YOU HAD WITNESSED AND KNEW ABOUT WHILE YOU WERE AT CHURCH
6 UNIVERSAL AND TRIUMPHANT?

7 A. YES, I DID.

8 Q. WHO DID YOU WRITE THAT LETTER TO?

9 A. TO LAS VIRGENES TIMES NEWSPAPER. I DON'T KNOW THE
10 EXACT NAME.

11 Q. WHILE YOU WERE IN THE CHURCH WERE YOU EVER
12 SOLICITED TO WRITE FAVORABLE LETTERS FOR THE CHURCH?

13 A. YES, I WAS.

14 Q. THE LETTER IN 1981 THAT YOU WROTE WAS THAT LETTER
15 THAT YOU -- AFTER YOU SEVERED YOUR TIES WITH THE CHURCH?

16 A. TO THE NEWSPAPERS, YES, IT WAS.

17 MR. LEVY: YOUR HONOR, AT THIS TIME, I WOULD LIKE TO
18 MARK FOR IDENTIFICATION A LETTER THAT'S DATED FEBRUARY THE
19 30TH, 1981, A LETTER THAT BEARS DAVID PASSEGER'S NAME ON THE
20 TOP OF THE FIRST PAGE.

21 THE COURT: SO MARKED FOR IDENTIFICATION. EXHIBIT 104
22 MARKED FOR IDENTIFICATION.

23 Q. BY MR. LEVY: MR. PASSEGER, I'M SHOWING YOU A
24 LETTER, IT'S GOT A NUMBER 104 UP IN THE TOP CORNER. I WOULD
25 LIKE YOU TO GLANCE AT THE LETTER AND SEE ON THE SECOND PAGE IF
26 THAT'S YOUR SIGNATURE ON THAT LETTER.

27 A. YES, IT'S MY SIGNATURE.

28 Q. DID YOU WRITE THAT LETTER?

1 A. YES, I DID.

2 Q. IS THAT AN ACCURATE AND HONEST REPRESENTATION OF
3 YOUR FEELINGS AND YOUR THOUGHTS AT THE TIME IN 1981 WHEN YOU
4 WROTE THAT LETTER?

5 A. YES, IT IS.

6 MR. LEVY: YOUR HONOR, AT THIS TIME I APOLOGIZE TO THE
7 COURT FOR NOT HAVING COPIES OF THIS BUT I JUST CAME INTO
8 POSSESSION OF IT. WHAT I WOULD LIKE TO DO IS READ IT TO THE
9 COURT SINCE MR. PASSEGER HAS TESTIFIED THAT IT'S AN HONEST AND
10 ACCURATE REPRESENTATION OF HIS THOUGHTS AND ATTITUDES WITH
11 REGARD TO HIS EXPERIENCE AT THAT TIME.

12 MR. KLEIN: YOUR HONOR, IF I MAY BE HEARD. I WOULD
13 OBJECT TO THAT. FIRST OF ALL, IT WASN'T ON THE LIST OF
14 EXHIBITS OF THIS TRIAL. SECONDLY, IT IS A SELF-SERVING HEARSAY
15 LETTER, YOUR HONOR.

16 MR. LEVY: AS MR. KLEIN KNOWS, YOUR HONOR, AS WITH SOME
17 OF THE EXHIBITS HE PRESENTED IT TO US HERE THEY ALSO WERE NOT
18 ON THE LIST.

19 THE COURT: BOTH SIDES HAVE ADDED EXHIBITS.

20 MR. KLEIN: YOUR HONOR, ON CROSS-EXAMINATION AND
21 REBUTTAL I UNDERSTAND IT'S PROPER --

22 THE COURT: I DON'T WANT TO HEAR ANY MORE.

23 THE OBJECTION IS SUSTAINED. YOU MAY HAVE OCCASION
24 TO READ IT AT SOME LATER TIME. NOT AT THIS TIME.

25 MR. LEVY: WELL, MAY I INQUIRE WITH REGARD TO CERTAIN
26 PORTIONS OF THE LETTER TO DETERMINE WHETHER OR NOT THAT WAS THE
27 ACTUAL ATTITUDE OF MR. PASSEGER AT THE TIME THE DOCUMENT WAS
28 WRITTEN?

1 THE COURT: WHY DON'T YOU HOLD IT AND SEE WHAT DEVELOPS
2 BETWEEN NOW AND REBUTTAL.

3 MR. LEVY: OKAY, YOUR HONOR. I WILL TAKE THE COURT'S
4 ADVICE.

5 AT THIS TIME I HAVE NOTHING FURTHER ON DIRECT FOR
6 THIS WITNESS.

7

8

CROSS-EXAMINATION +

9

BY MR. KLEIN:

10 Q. MR. PASSEGER, WOULD YOU CALL YOURSELF A CLOSE
11 PERSONAL FRIEND OF GREGORY MULL?

12 A. YES, I WOULD.

13 Q. AND YOU FIRST KNEW HIM IN AROUND DECEMBER OF 1977?

14 A. YES, SIR.

15 Q. AT THAT TIME YOU LIVED IN HIS HOUSE IN SAN
16 FRANCISCO?

17 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR. THE WITNESS
18 HAS ALREADY TESTIFIED HE RENTED AN APARTMENT FROM MR. MULL.
19 MR. KLEIN IS MISCHARACTERIZING THE TESTIMONY.

20 Q. BY MR. KLEIN: IN 1978 DID YOU LIVE AT MR. MULL'S
21 HOUSE AT 58 CASSELLI AVENUE IN SAN FRANCISCO?

22 A. YES, I DID.

23 Q. SO THAT WASN'T A SEPARATE APARTMENT? THAT WAS HIS
24 HOUSE?

25 A. NO, IT WAS A SEPARATE APARTMENT.

26 Q. WAS IT A SEPARATE APARTMENT RIGHT IN BACK OF THE
27 HOUSE?

28 A. NO, IT WAS IN FRONT OF THE HOUSE. IT WAS THE

1 FRONT HOUSE. MR. MULL RESIDED IN THE REAR HOUSE.

2 Q. WERE THE TWO HOUSES CONNECTED?

3 A. ONE WAS AT THE FRONT OF THE LOT AND THE OTHER ONE
4 WAS AT THE REAR OF THE LOT WITH A GARDEN IN BETWEEN.

5 Q. HOW MUCH DISTANCE WAS THERE BETWEEN THE FRONT
6 HOUSE AND THE BACK HOUSE?

7 MR. LEVY: I'M GOING TO OBJECT TO THAT, YOUR HONOR.
8 WHAT'S THE RELEVANCE?

9 THE COURT: YOU CAN ANSWER --

10 Q. BY MR. KLEIN: ARE WE TALKING ABOUT A SIGNIFICANT
11 DISTANCE OR ARE WE TALKING ABOUT SOME YARDS?

12 A. A COUPLE HUNDRED FEET.

13 THE COURT: SIGNIFICANT IS AMBIGUOUS, ISN'T IT?

14 MR. KLEIN: YES, IT IS, YOUR HONOR.

15 Q. PRIOR TO GOING TO SUMMIT UNIVERSITY, DID YOU HAVE
16 ANY IDEA ABOUT THE RULES AND REGULATIONS THEY HAD THERE?

17 A. THE RULES AND REGULATIONS WERE IN ADHERENCE TO THE
18 CODE OF CONDUCT.

19 Q. DID YOU KNOW THERE WAS A CODE OF CONDUCT BEFORE
20 YOU WENT TO SUMMIT UNIVERSITY?

21 A. YES, I DID.

22 Q. DID YOU READ IT?

23 A. YES, I DID.

24 Q. DID YOU TALK TO GREGORY MULL AT ALL ABOUT SUMMIT
25 UNIVERSITY PRIOR TO WHEN YOU WENT THERE?

26 A. YES, I DID.

27 Q. DID HE TELL YOU SOMETHING ABOUT WHAT IT WAS LIKE
28 THERE?

1 A. THE ONLY THING HE SAID WAS NO MATTER WHAT HAPPENED
2 STAY.

3 Q. THE FACT THAT HE SAID THAT TO YOU HAVE AN AFFECT
4 UPON YOU?

5 A. NOT AT THE TIME, NO.

6 Q. NOW, YOU SAID THAT WHILE YOU WERE AT SUMMIT
7 UNIVERSITY YOU WERE PHYSICALLY TIRED; IS THAT CORRECT?

8 A. YES, THAT'S CORRECT.

9 Q. YOU FELT ALONE AND CUT OFF?

10 A. YES.

11 Q. NOBODY PREVENTED YOU FROM LEAVING, DID THEY?

12 A. NO, NOT PHYSICALLY.

13 Q. DID THEY PREVENT YOU FROM LEAVING IN SOME OTHER
14 WAY?

15 A. PSYCHOLOGICALLY, YES.

16 Q. WHAT DID THEY DO TO PSYCHOLOGICALLY PREVENT YOU
17 FROM YOU LEAVING?

18 A. THIS IS YOUR BIG MOMENT TO MAKE IT AND IF YOU WALK
19 OUT THAT'S TOO BAD.

20 Q. HAVE YOU EVER BEEN --

21 WITHDRAW.

22 YOU TALKED ABOUT THIS IS YOUR CHANCE AND ONE
23 CHANCE IN 10,000 YEARS. DO YOU RECALL THAT ON DIRECT?

24 A. YES, I DO.

25 Q. IS THE TEACHING OF THE CHURCH THAT EVERY 10,000
26 YEARS THERE IS AN AGE OF ENLIGHTENMENT?

27 A. YES.

28 Q. IS THE TEACHING OF THE CHURCH THAT RIGHT NOW IS

1 THAT 10,000 YEARS?

2 A. YES.

3 Q. THAT PEOPLE LIVING RIGHT NOW HAVE THAT OPPORTUNITY
4 FOR ENLIGHTENMENT?

5 A. YES, UH-HUH.

6 Q. IS IT TRUE THAT THE CHURCH TEACHES THAT PEOPLE CAN
7 MAKE THEIR ASCENSION EVEN IF THEY'RE IN OTHER RELIGIONS?

8 A. YES. IT HAPPENS RARELY.

9 Q. THEY TELL YOU IT HAPPENS RARELY?

10 A. IN TERMS OF NUMBERS OF PEOPLE MAKING THEIR
11 ASCENSION, YES, IT CAN HAPPEN.

12 Q. BUT YOU DON'T HAVE TO BE A MEMBER OF CHURCH
13 UNIVERSAL AND TRIUMPHANT TO MAKE YOUR ASCENSION, DO YOU?

14 A. NO.

15 Q. SO EMOTIONALLY YOU FOUND IT VERY DIFFICULT TO
16 LEAVE SUMMIT UNIVERSITY?

17 A. YES.

18 Q. WHAT MONTH DID YOU FINISH WITH YOUR CLASSES AT
19 SUMMIT UNIVERSITY?

20 A. DECEMBER.

21 Q. OF WHAT YEAR?

22 A. 1978.

23 Q. AND DID YOU STILL HAVE THAT STRONG EMOTIONAL TIE
24 TO THE CHURCH AT THAT TIME?

25 A. YES, I DID.

26 Q. DECEMBER OF '78. IN DECEMBER OF '78 DID YOU THEN
27 IMMEDIATELY GO TO CAMELOT AND WORK THERE?

28 A. I WAS ALREADY AT CAMELOT.

1 Q. WELL, WHEN YOU FINISHED SUMMIT UNIVERSITY, DID YOU
2 START WORKING AT CAMELOT AS A STAFF MEMBER?

3 A. NO, I DIDN'T.

4 Q. IN FACT WHAT YOU DID IN DECEMBER OF '78 WAS YOU
5 LEFT THE CHURCH AND HAD NO MORE CONNECTIONS WITH IT FOR A YEAR;
6 IS THAT RIGHT?

7 A. NO, THAT'S NOT CORRECT.

8 Q. DID YOU HAVE ANY CONNECTION WITH IT THE SUCCEEDING
9 YEAR?

10 A. YES, I DID.

11 Q. DID YOU HAVE ANY CONNECTIONS WITH IT FOR THE SIX
12 MONTHS AFTER DECEMBER '78?

13 A. I ATTENDED ALL THE SERVICES AT THE TEACHING CENTER
14 IN SAN FRANCISCO AND I RETURNED TO CAMELOT FOR THE CONFERENCE
15 AT EASTER TIME, FOURTH OF JULY, SEPTEMBER OF THAT YEAR AND FOR
16 CHRISTMAS. IN OTHER WORDS, EVERY SUBSEQUENT CONFERENCE AFTER
17 DECEMBER OF '78 I CONTINUED THE DECREEZING AND CONTINUED READING
18 THE BOOKS PUT OUT BY THE CHURCH.

19 Q. WHEN YOU LEFT THE CHURCH IN DECEMBER 1978, YOU
20 WENT BACK TO SAN FRANCISCO?

21 A. YES, I DID.

22 Q. AND YOU LIVED WITH MR. MULL THERE?

23 A. YES.

24 Q. DID YOU PAY HIM MONEY FOR LIVING WITH HIM AT THAT
25 TIME?

26 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR. RELEVANCE.

27 THE COURT: HE CAN ANSWER.

28 THE WITNESS: NO, NOT RIGHT AWAY. AT THAT TIME WITHIN A

1 WEEK OR SO AFTER I BEGAN LIVING AT MR. MULL'S RESIDENCE HE HAD
2 MOVED TO CAMELOT.

3 Q. MY QUESTION IS WHEN YOU LIVED AT HIS RESIDENCE IN
4 1978 DID YOU PAY HIM ANY MONEY, ANY RENT MONEY OR ANYTHING FOR
5 LIVING THERE?

6 A. NO, I DIDN'T.

7 Q. WITH RESPECT TO BEING A PERMANENT STAFF MEMBER HAD
8 YOU REQUESTED PRIOR TO GOING TO SUMMIT UNIVERSITY TO BE MADE A
9 PERMANENT STAFF MEMBER?

10 A. I DON'T RECALL NOW. I MAY HAVE. BUT I WAS TOLD
11 AT THE TIME THAT YOU HAD TO ATTEND -- THAT ANYONE GOING ON
12 STAFF HAD TO ATTEND SUMMIT SO IT WAS A MOOT POINT.

13 Q. DO YOU RECALL BEFORE GOING TO SUMMIT UNIVERSITY
14 YOU ASKED TO BE A PERMANENT STAFF MEMBER AND WERE TOLD YOU
15 COULDN'T BE A PERMANENT STAFF MEMBER UNLESS YOU GO TO SUMMIT
16 UNIVERSITY? DO YOU REMEMBER THAT? DOES THAT REFRESH YOUR
17 RECOLLECTION?

18 A. I HAVE A HAZY MEMORY OF IT BUT PROBATIONARY STAFF,
19 NOT PERMANENT.

20 Q. YOU SAID SOMETHING ABOUT YOU BURNED YOUR BRIDGES
21 AND THEN RETURNED TO SAN FRANCISCO. WHAT DID YOU MEAN BY
22 BURNED YOUR BRIDGES?

23 A. PRIOR TO ATTENDING SUMMIT UNIVERSITY, I HAD JUST
24 COMPLETED A MASTERS PROGRAM AT SAN FRANCISCO STATE. I HAD BEEN
25 OFFERED A TEACHING POSITION TEACHING ENGLISH IN JAPAN. I HAD A
26 TEACHING JOB AFTER SUMMIT UNIVERSITY. I HAD EFFECTIVELY
27 SEVERED ANY OF THOSE OPPORTUNITIES AT THE UNIVERSITY. I HAD
28 LOST MY TEACHING JOB. THE JOB IN JAPAN WAS TAKEN BY SOMEONE

1 ELSE AND I HAD NO MEANS OF INCOME AT THAT TIME.

2 Q. AND DID ANYBODY AT SUMMIT UNIVERSITY TELL YOU TO
3 SEVER THOSE TIES?

4 A. INDIRECTLY. BECAUSE TEACHING OVER IN JAPAN
5 OBVIOUSLY I WOULD HAVE BEEN SEPARATED PHYSICALLY FROM THE
6 CHURCH.

7 Q. SO BY GOING TO SUMMIT UNIVERSITY YOU HAD TO SEVER
8 YOUR TIES, IS THAT WHAT YOU'RE TELLING ME? IS THAT HOW THEY
9 INDIRECTLY DID IT?

10 A. SEVER MY TIES?

11 Q. WITH THE UNIVERSITY JOB THAT YOU WERE TRYING TO
12 GET?

13 A. YES. SEVER YOUR TIES WITH THE OUTSIDE WORLD. YOU
14 KEEP A JOB BUT THAT'S IT.

15 Q. ARE YOU BITTER AT ALL THAT BY GOING TO SUMMIT
16 UNIVERSITY YOU LOST THAT OPPORTUNITY FOR THE TEACHING JOB?

17 A. YES. AT TIMES I REGRET THAT DECISION.

18 Q. NOW, YOU SAID AT SOME POINT MONROE SHEARER TALKED
19 TO YOU ABOUT COMING ON STAFF AND TRANSLATING THINGS INTO
20 RUSSIAN. THAT WAS THE END OF YOUR SUMMIT UNIVERSITY QUARTER;
21 IS THAT TRUE?

22 A. YES, IT WAS.

23 Q. WAS THAT OUT OF THE BLUE? HAD YOU EVER DISCUSSED
24 WITH THEM YOUR DOING SUCH A FUNCTION AT CAMELOT?

25 A. NO, I HAD NOT.

26 Q. YOU HAD NEVER OFFERED TO COME TO CAMELOT AND TEACH
27 RUSSIAN?

28 A. I CAN'T REMEMBER IF THAT WAS THE -- I REALLY DON'T

1 REMEMBER. MOST OF THE EVENTS BEFORE SUMMIT I HAVE SOMEWHAT OF
2 A HAZY MEMORY ABOUT. I HAVE A FAINT MEMORY THAT I DID OFFER,
3 BUT I CAN'T REMEMBER THE SPECIFICS.

4 Q. HOW MANY TIMES WHEN YOU RETURNED TO LOS ANGELES IN
5 1979 DID YOU TRY TO CONTACT THE PEOPLE AT CAMELOT IN ORDER TO
6 TALK ABOUT YOU GETTING A STAFF POSITION?

7 A. I DON'T REMEMBER THE SPECIFIC NUMBER OF TIMES. I
8 HAD WRITTEN SEVERAL LETTERS EVEN BEFORE LEAVING SAN FRANCISCO.
9 I HAD TALKED TO SEVERAL STAFF MEMBERS THAT I WOULD ENCOUNTER AT
10 THE SERVICES UNTIL FINALLY MR. MULL INTRODUCED ME TO A LADY
11 WHO -- ONE OF THE HIERARCHS AT MONTESSORI.

12 Q. PRIOR TO WHEN MR. MULL INTERVENED FOR YOU WERE YOU
13 UPSET THAT NOBODY FROM CAMELOT GOT BACK TO YOU WHEN YOU
14 REQUESTED TO JOIN THE STAFF?

15 A. I DON'T THINK UPSET WAS THE WORD. I JUST FIGURED
16 IT WAS ANOTHER INITIATION.

17 Q. AFTER YOU LEFT THE CHURCH, DID YOU LIVE IN MR.
18 MULL'S CONDOMINIUM IN WESTLAKE?

19 A. NO, I HAD MOVED OUT SEVERAL MONTHS BEFORE EITHER
20 ONE OF US LEFT.

21 Q. AT WHAT POINT DID YOU LIVE IN HIS CONDOMINIUM IN
22 WESTLAKE?

23 A. I'M SORRY.

24 Q. WAS THERE A POINT WHERE YOU LIVED AT HIS
25 CONDOMINIUM IN WESTLAKE?

26 A. YES.

27 Q. WHAT POINT WAS THAT?

28 A. THE POINT AFTER I HAD BEEN ACCEPTED TO BE ON STAFF

1 BUT HAD NOT YET -- THE FACILITIES AT CAMELOT WERE LIMITED. I
2 KNEW THERE WOULDN'T BE ANY LIVING SPACE THERE. MR. MULL'S
3 CONDOMINIUM WAS ONLY 15 MINUTES AWAY. IT WAS AGREED BETWEEN US
4 I WOULD LIVE THERE.

5 Q. DID YOU PAY ANY RENT TO HIM?

6 A. YES, I DID.

7 Q. HOW MUCH DID YOU PAY?

8 A. I DON'T RECALL. A COUPLE HUNDRED DOLLARS.

9 Q. HAD GREGORY MULL NOT ENCOURAGED YOU TO TRY TO JOIN
10 THE STAFF WOULD YOU HAVE JOINED IT OR WOULD YOU HAVE ATTEMPTED
11 TO JOIN IT?

12 A. I DOUBT IF I HAD BEEN IN THE TEACHING AT THAT
13 POINT WITHOUT MR. MULL.

14 THE COURT: LET ME HEAR THAT QUESTION, PLEASE.

15 (QUESTION READ.)

16 THE COURT: THANK YOU.

17 Q. BY MR. KLEIN: WHEN DID YOU CUT OFF YOUR
18 ASSOCIATION WITH THE CHURCH?

19 A. DURING THIS SAME -- ABOUT THE SAME WEEK MR. MULL
20 LEFT.

21 Q. DID THE FACT THAT MR. MULL LEFT HAVE ANY
22 SIGNIFICANCE WITH RESPECT TO YOU CUTTING OFF YOUR ASSOCIATION
23 WITH THE CHURCH?

24 A. I WAS IN A QUANDRY AT THE TIME AND IT HELPED.

25 Q. WHEN YOU LEFT DID ANYBODY PREVENT YOU FROM
26 LEAVING?

27 A. NO.

28 Q. DID ANYBODY DO ANYTHING TO YOU AFTER YOU LEFT FROM

1 THE CHURCH AS FAR AS YOU LEAVING?

2 A. NO.

3 Q. ANYBODY THREATEN YOU?

4 A. NO. THEY DIDN'T KNOW WHERE I WAS.

5 Q. WAS THERE ALSO A TIME WHEN YOU LIVED WITH DONALD
6 ST. MICHAEL.

7 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR. WHAT'S THE
8 RELEVANCE?

9 MR. KLEIN: I JUST HAVE THAT ONE QUESTION, YOUR HONOR.

10 THE COURT: HUH?

11 MR. KLEIN: I SAY I JUST HAVE THAT ONE QUESTION.

12 THE COURT: WELL, THAT DOES NOT OVERCOME A RELEVANCY
13 PROBLEM.

14 MR. KLEIN: I APPRECIATE THAT, YOUR HONOR.

15 THE COURT: OBJECTION SUSTAINED.

16 MR. KLEIN: THANK YOU. I HAVE NO FURTHER QUESTIONS.

17 MR. LEVY: JUST ONE OR TWO.

18

19

REDIRECT EXAMINATION +

20 BY MR. LEVY:

21 Q. MR. PASSEGER, YOU TOLD US YOU WERE A TENANT OF MR.
22 MULL'S IN 1978?

23 A. YES, THAT'S CORRECT.

24 Q. WERE YOU A GOOD FRIEND OF GREGORY MULL'S AT THAT
25 TIME?

26 A. YES, I WAS.

27 Q. WERE YOU PRESENT WHEN MR. MULL RECEIVED A CALL
28 FROM CAMELOT ASKING HIM TO COME TO CAMELOT?

1 A. I DON'T KNOW IF I WAS PHYSICALLY PRESENT IN THE
2 HOUSE AT THE TIME BUT SHORTLY THEREAFTER MR. MULL INFORMED ME
3 OF THE CONVERSATION.

4 Q. AND WOULD YOU RELATE WHAT IT WAS HE RELATED TO
5 YOU.

6 MR. KLEIN: AGAIN I WOULD OBJECT AS TO HEARSAY, YOUR
7 HONOR.

8 THE COURT: SUSTAINED.

9 Q. BY MR. LEVY: HOW DID MR. MULL APPEAR TO YOU
10 EMOTIONALLY AFTER HE RECEIVED THAT CALL?

11 A. HE WAS EXCITED.

12 Q. DID HE TELL YOU WHY HE WAS EXCITED?

13 A. BECAUSE --

14 MR. KLEIN: I'M GOING TO OBJECT AS TO HEARSAY, YOUR
15 HONOR.

16 MR. LEVY: COULD WE HEAR WHAT HE SAYS.

17 YOU MAY ANSWER.

18 THE COURT: THE JURY MAY CONSIDER THE ANSWER TO THIS
19 QUESTION NOT AS EVIDENCE OF THE TRUTH OF THE STATEMENT ITSELF
20 BUT MAY CONSIDER IT AS EVIDENCE OF THE STATE OF MIND OF THE
21 DECLARANT, MR. MULL, AT THAT TIME.

22 Q. BY MR. LEVY: YOU MAY ANSWER THE QUESTION.

23 A. MR. MULL WAS EXCITED ABOUT THE OFFER OR THE
24 SUGGESTION THAT HE COME DOWN TO CAMELOT AS A STAFF ARCHITECT
25 MAINLY BECAUSE THEY WERE OFFERING IT TO HIM ON UNRESTRICTED
26 TERMS.

27 Q. MR. KLEIN ASKED YOU IF YOU WERE BITTER ABOUT NOT
28 GETTING SEVERAL JOBS OR MISSING OUT ON SEVERAL JOBS AND YOU

1 TOLD HIM YOU AT SOMETIMES REGRETTED IT. WHEN YOU WROTE THIS
2 LETTER WERE YOU BITTER AT THE CHURCH?

3 A. I THINK A BETTER WORD WOULD BE DISAPPOINTED.

4 THE COURT: BY THIS LETTER, ARE YOU REFERRING TO EXHIBIT
5 104?

6 MR. LEVY: YES, YOUR HONOR.

7 WITH THE COURT'S PERMISSION AT THIS TIME --

8 Q. IS THIS AN ACCURATE REFLECTION OF YOUR EMOTIONS AT
9 THAT TIME, WHETHER THEY REFLECT BITTERNESS OR NOT?

10 A. YES, IT IS.

11 MR. LEVY: AT THIS TIME, YOUR HONOR, I WOULD REQUEST
12 PERMISSION TO READ THIS LETTER INTO THE RECORD AS AN ACCURATE
13 AND HONEST REPRESENTATION OF EXACTLY WHAT MR. PASSEGER THOUGHT
14 WITH REGARD TO BITTERNESS OR NONBITTERNESS AT THAT TIME.

15 MR. KLEIN: I WOULD OBJECT AS TO HEARSAY, YOUR HONOR.

16 THE COURT: AS WHAT?

17 MR. KLEIN: AS TO HEARSAY AND AS TO THE RELEVANCE, BOTH.

18 THE COURT: OBJECTION SUSTAINED ON THE FIRST OF THE TWO.

19 Q. BY MR. LEVY: DO YOU RECALL WHAT YOU WROTE IN THE
20 LETTER?

21 A. IT'S BEEN TOO MANY YEARS. I THINK I BRIEFLY
22 OUTLINED HOW I FELT THE CHURCH TREATED ITS MEMBERS.

23 Q. WHAT I'D LIKE YOU TO DO IS TAKE A GLANCE AT THE
24 LETTER, BRIEFLY READ THROUGH IT AND SEE IF IT REFRESHES YOUR
25 RECOLLECTION AS TO THE CONTENTS.

26 (WITNESS READING.)

27 A. YES, IT DOES.

28 Q. OKAY. WOULD YOU TELL US BRIEFLY WHAT WAS IN YOUR

1 HEART AND MIND AT THAT TIME WITH REGARD TO YOUR EXPERIENCE WITH
2 MR. MULL AND THE CHURCH UNIVERSAL AND TRIUMPHANT.

3 A. AH --

4 Q. LET ME HELP YOU. FIRST OF ALL, WHY DID YOU WRITE
5 THE LETTER?

6 A. BECAUSE FROM MY OWN PAST EXPERIENCE AT THE CHURCH
7 I KNEW THAT THOSE WHO SPOKE OUT AGAINST THE CHURCH IN THE PRESS
8 THAT MEMBERS OF THE CHURCH WERE ASKED TO WRITE LETTERS
9 SUPPORTING THE CHURCH TO WHATEVER NEWSPAPER WAS REPORTING
10 ARTICLES AND THAT NOTHING -- NO ONE WAS SUPPORTING MR. MULL IN
11 HIS STATEMENTS SO I WROTE THIS LETTER TO SAY THAT HE'S NOT THE
12 ONLY EX-CHURCH MEMBER THAT FEELS THIS WAY.

13 Q. TO YOUR KNOWLEDGE HAD MR. MULL CONTRIBUTED FUNDS
14 TO CHURCH UNIVERSAL AND TRIUMPHANT?

15 A. YES.

16 Q. DID HE PAY FOR PEOPLE'S QUARTERS TO GO TO SUMMIT
17 UNIVERSITY?

18 A. YES, HE DID. HE ARRANGED FOR PAYMENT OF MY
19 TUITION.

20 Q. WAS THERE A POLICY AT THE CHURCH AT THAT TIME THAT
21 YOU MADE REFERENCE TO IN THAT LETTER ABOUT THE ATTITUDE OF THE
22 CHURCH AND THE HIERARCHS AND THE BOARD TOWARD PEOPLE WHO
23 DISAGREED WITH THE DICTATES OF ELIZABETH CLARE PROPHET?

24 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS IMPROPER
25 REDIRECT.

26 THE COURT: DOES IT GO BEYOND THE SCOPE OF
27 CROSS-EXAMINATION?

28 MR. LEVY: I DON'T BELIEVE IT DOES, YOUR HONOR. I

1 BELIEVE IT EXPLAINS SOME OF HIS PRIOR TESTIMONY.

2 THE COURT: HE CAN ANSWER IT.

3 THE WITNESS: WE WERE TOLD -- I REMEMBER BEING TOLD THAT
4 PEOPLE WHO SPOKE OUT AGAINST THE CHURCH WERE BETRAYERS, THAT
5 THEY -- SOME OF THEM WERE THE REINCARNATION OF THE PHARISEES
6 WHO HAD CONDEMNED JESUS AND THAT THEY REPRESENTED THE DEVIL.

7 Q. WHEN YOU WROTE THE LETTER, WAS IT YOUR OPINION
8 THAT MR. MULL HAD BEEN TREATED EXTREMELY UNFAIRLY BY CHURCH
9 UNIVERSAL AND TRIUMPHANT.

10 MR. KLEIN: I'M GOING TO OBJECT AS TO LEADING, YOUR
11 HONOR.

12 THE COURT: SUSTAINED.

13 Q. BY MR. LEVY: WHEN YOU YOU WROTE THE LETTER, WHAT
14 WAS YOUR OPINION AS TO HOW THE CHURCH HAD TREATED MR. MULL?

15 A. THEY DIDN'T SEEM TO BE ADDRESSING THE SITUATION
16 THAT CAUSED MR. MULL TO LEAVE THE CHURCH. THEY SEEMED TO BE
17 AIMING DIRECTLY AT HIS PERSONALITY AND HIS CHARACTER RATHER
18 THAN ADDRESSING SPECIFIC REASONS FOR THE DISAGREEMENT WITH THE
19 CHURCH.

20 MR. LEVY: YOUR HONOR, AT THIS TIME, I WOULD MOVE TO
21 HAVE EXHIBIT 104 ENTERED INTO EVIDENCE.

22 MR. KLEIN: OBJECT AS HEARSAY, YOUR HONOR.

23 THE COURT: OBJECTION SUSTAINED.

24 MR. LEVY: I HAVE NOTHING FURTHER ON REDIRECT.

25 THE COURT: ANYTHING ELSE?

26 MR. KLEIN: YES, YOUR HONOR.

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REXCROSS-EXAMINATION +

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BY MR. KLEIN:

Q. AFTER YOU WROTE THE LETTER DID ANYBODY FROM THE CHURCH DO OR THREATEN TO DO ANYTHING TO YOU?

A. NO. THE LETTER WAS ANONYMOUS.

MR. KLEIN: CAN I SEE THE LETTER FOR A MOMENT, YOUR HONOR?

THE COURT: SURE.

Q. BY MR. KLEIN: DID YOU SIGN THE LETTER?

A. YES, I DID.

Q. SO HOW WOULD IT BE ANONYMOUS?

MR. LEVY: EXCUSE ME, YOUR HONOR, I WOULD OBJECT AT THIS POINT. IF MR. KLEIN WANTS TO QUESTION WITH REGARD TO THE CONTENTS OF THE LETTER, I HAVE NO ARGUMENT WITH THAT. HE'S ASKING FOR A PHILOSOPHICAL DISCUSSION AS TO A REQUEST MADE BY MR. PASSEGER WITHIN THE LETTER.

THE COURT: IF YOU SIGN IT HOW IS IT ANONYMOUS?

THE WITNESS: WHEN IT WAS PRINTED IN THE NEWSPAPER IT WAS PRINTED WITHOUT MY NAME BUT I HAD SIGNED THE LETTER WHEN I SENT IT TO THE NEWSPAPER.

Q. BY MR. KLEIN: YOU SAID MR. MULL PAID YOUR TUITION. WHY DID HE DO THAT? DO YOU KNOW?

MR. LEVY: OBJECTION, YOUR HONOR, CALLS FOR A CONCLUSION AS TO WHAT MR. MULL'S PURPOSES MIGHT HAVE BEEN.

THE COURT: SUSTAINED.

Q. BY MR. KLEIN: DID MR. MULL TELL YOU WHY HE PAID YOUR TUITION?

A. I SAID HE ARRANGED FOR PAYMENT OF TUITION.

1 Q. DO YOU KNOW WHO ACTUALLY PAID YOUR TUITION?

2 A. YES, I FOUND OUT LATER.

3 Q. WHO WAS THAT?

4 A. IT WAS A GENTLEMAN WHO WAS NOT IN THE TEACHINGS.

5 Q. IT WAS THROUGH MR. MULL'S INTERVENTION THAT THIS
6 GENTLEMAN PAID YOUR TUITION?

7 A. YES.

8 MR. KLEIN: NO FURTHER QUESTIONS. THANK YOU.

9 MR. LEVY: NOTHING FURTHER FOR THIS WITNESS, YOUR HONOR.
10 AND THE HOUR BEING ALMOST 12 --

11 THE COURT: ALL RIGHT. YOU ARE EXCUSED.

12 WE WILL RECESS NOW UNTIL 1:30. WE WILL RESUME AT
13 1:30.

14 REMEMBER THE COURT'S ADMONITION.

15 MR. LEVY: YOUR HONOR, BEFORE YOU LEAVE THE BENCH THIS
16 WITNESS WOULD CHOOSE TO REMAIN IN THE COURTROOM THIS AFTERNOON.
17 WITHOUT ANY OBJECTION FROM MR. KLEIN, WOULD IT BE PERMISSIBLE
18 TO THE COURT?

19 MR. KLEIN: I DON'T HAVE ANY OBJECTION, YOUR HONOR.

20 THE COURT: THAT'S AGREEABLE.

21 MR. LEVY: THANK YOU, YOUR HONOR.

22 THE COURT: OKAY.

23 (AT 11:58 A.M. A RECESS WAS TAKEN.)

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1 LOS ANGELES, CALIFORNIA; MONDAY, *FEBRUARY 24, 1986; 1:36 P.M.

2 -000-

3 THE COURT: PLEASE PROCEED.

4 MR. LEVY: THANK YOU, YOUR HONOR.

5 AT THIS TIME I WOULD LIKE TO PRESENT AS A WITNESS
6 MR. DONALD TROWBRIDGE.

7
8 DONALD SCOTT TROWBRIDGE, +
9 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
10 AS FOLLOWS:

11 THE CLERK: PLEASE BE SEATED IN THE WITNESS STAND.

12 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND
13 PLEASE SPELL YOUR FIRST AND LAST NAME.

14 THE WITNESS: DONALD SCOTT TROWBRIDGE, D-O-N-A-L-D, LAST
15 NAME IS T-R-O-W- B-R-I-D-G-E.

16 THE CLERK: SPELL THAT ONE MORE TIME FOR ME SLOWER.

17 THE WITNESS: T-R-O-W-B-R-I-D-G-E.

18 THE CLERK: THANK YOU.

19
20 DIRECT EXAMINATION +

21
22 BY MR. LEVY:

23 Q. MR. TROWBRIDGE, ARE YOU A MEMBER OF CHURCH
24 UNIVERSAL?

25 A. NO, I'M NOT.

26 Q. WERE YOU?

27 A. YES, I WAS.

28 Q. DURING WHAT YEARS WERE YOU A MEMBER OF THE CHURCH?

1 A. FROM 1968 TO 1983.

2 Q. ALMOST 15 YEARS?

3 A. THAT'S RIGHT.

4 Q. DID YOU ATTEND SUMMIT UNIVERSITY?

5 A. YES, I DID.

6 Q. WHEN DID YOU ATTEND SUMMIT UNIVERSITY?

7 A. 1974, FIRST THREE MONTHS OF THE YEAR AND THEN 1978
8 THE FIRST THREE MONTHS OF THAT YEAR.

9 Q. WHAT IS SUMMIT UNIVERSITY?

10 A. IT'S A SCHOOL THAT CHURCH UNIVERSITY HAS TO TEACH
11 THROUGH TEACHINGS, INDOCTRINATE YOU INTO THEIR DOGMA, THEIR
12 FAITH, THEIR BELIEF.

13 Q. COULD YOU GIVE US A BRIEF DESCRIPTION OF YOUR TIME
14 AT EITHER QUARTER YOU ATTENDED AT SUMMIT UNIVERSITY.

15 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO RELEVANCE.

16 THE COURT: PLEASE READ THE QUESTION FOR ME.

17 (QUESTION READ.)

18 MR. KLEIN: I WOULD ALSO OBJECT AS TO VAGUE AND
19 AMBIGUOUS FOR THAT QUESTION.

20 THE COURT: OVERRULED.

21 Q. BY MR. LEVY: YOU MAY TELL US ABOUT THE TIME YOU
22 ATTENDED A QUARTER AT SUMMIT.

23 A. IT WAS A FULL-TIME OCCUPATION. I WAS THERE FOR
24 THREE MONTHS AT A TIME IN BOTH CASES AND MY TIME WAS -- WELL,
25 ACTUALLY IT WAS TAKEN UP 24 HOURS A DAY. I WAS STILL AT THAT
26 TIME CONSIDERED A STAFF MEMBER. I WAS A STAFF MEMBER BOTH
27 TIMES I ATTENDED SO THAT THE REGULAR UNIVERSITY SCHEDULE, WHICH
28 THEY CALL IT, WAS BASICALLY BEGAN AT 6:00 IN THE MORNING, MORE

1 OR LESS, AND ENDED GENERALLY AROUND 6:00 AT NIGHT.

2 IT COULD GO LONGER, WHICH IT DID ON A NUMBER OF
3 OCCASIONS, AND OTHER TIME AFTER THAT INTO THE EVENING I COULD
4 HAVE WELL BEEN EXPECTED TO PARTICIPATE IN OTHER ACTIVITIES
5 WHICH THEY MIGHT WANT ME TO DO, LIKE DECREERING FOR THE
6 PROTECTION OF THE LEADER OF THE CHURCH.

7 Q. DID THERE EVER COME A TIME IN THE MIDDLE OF THE
8 NIGHT WHERE YOU WERE SUMMONED TO COME AND DECREE FOR SOMETHING
9 FOR ELIZABETH CLARE PROPHET?

10 A. A NUMBER OF OCCASIONS WE WERE ASKED TO COME BACK
11 FROM WHERE WE WERE LIVING AT SUMMIT UNIVERSITY AND COME BACK TO
12 THE MAIN HEADQUARTERS AND STAY THERE FOR A NUMBER OF HOURS AT A
13 TIME AND DO THOSE DECREES.

14 Q. DO YOU REMEMBER WHAT THE PURPOSE OF DOING THE
15 DECREES WAS?

16 A. WELL, IT WAS ALWAYS TO PROTECT THE ORGANIZATION,
17 THE CHURCH, ESPECIALLY THE LEADER FROM WORLD CONDITIONS WHICH
18 THEY CONSIDERED TO BE BAD OR AGAINST THEM.

19 Q. DID ELIZABETH CLARE PROPHET EVER TELL YOU SHE
20 FREQUENTLY WAS INVOLVED IN THE SAVING OF THE PLANET THAT'S WHY
21 YOU HAD TO DECREE?

22 A. YES.

23 MR. KLEIN: YOUR HONOR, I WILL OBJECT AS TO THE
24 RELEVANCE OF THE QUESTION.

25 THE COURT: HE CAN ANSWER.

26 THE WITNESS: YES. ABSOLUTELY.

27 Q. BY MR. LEVY: WERE THERE TIMES YOU WENT TO DECREE
28 FOR HOURS BECAUSE SHE SAID SHE PERSONALLY WAS IN DANGER?

1 A. YES.

2 Q. IF YOU COULD CONCLUDE YOUR COMMENTS WITH REGARD TO
3 SUMMIT UNIVERSITY BY SAYING WHETHER OR NOT IT HAD AN AFFECT ON
4 YOU. DID YOU BELIEVE IT HAD AN AFFECT ON YOU THREE MONTHS AT
5 SUMMIT?

6 A. YES. VERY BIG AFFECT.

7 Q. WOULD YOU TELL US WHAT THE EFFECT WAS?

8 A. WELL, IT MADE ME WANT TO BECOME MORE OF A DEVOTED
9 MEMBER THAN I ALREADY WAS, STAFF MEMBER THAN I ALREADY WAS. IT
10 MADE ME WANT TO -- IT WAS HARD BEING A STAFF MEMBER. IT
11 ACTUALLY MADE ME WANT TO GO OUT AND DO THINGS WHICH STAFF
12 WEREN'T ALLOWED TO DO, WHICH WAS TO LEAVE THE STAFF AND TO
13 MAYBE GO JOIN A POLITICAL ORGANIZATION TO HELP CONDITIONS WHICH
14 THEY THOUGHT NEEDED TO BE CHANGED IN THE WORLD. SO IT MADE A
15 BIG IMPACT ON ME, AND I WASN'T ABLE TO DO THAT. SO I HAD TO
16 KEEP MY DEVOTION IN -- CENTERED ON MY STAFF ACTIVITIES.

17 Q. FOR THE BULK OF THE 15 YEARS THAT YOU WERE
18 INVOLVED WITH CHURCH UNIVERSAL TRIUMPHANT DID YOU HONESTLY
19 BELIEVE THAT YOU WERE SERVING A RELIGIOUS PURPOSE?

20 A. YES.

21 Q. WAS ELIZABETH THAT RELIGIOUS PURPOSE?

22 A. YES, IT WAS.

23 Q. DID YOU WORK YOUR HARDEST IN ORDER TO ACCOMPLISH
24 THE RELIGIOUS ENDS OF YOUR CHURCH?

25 A. I GENERALLY THOUGHT THAT I DID.

26 Q. DID YOU FIND ANYTHING ELSE OUT WITH REGARD TO YOUR
27 ATTITUDES TOWARD THE CHURCH AFTER YOU LEFT THE CHURCH?

28 MR. KLEIN: I'M GOING THE OBJECT AS TO VAGUE AND

1 AMBIGUOUS, YOUR HONOR.

2 THE COURT: SUSTAINED.

3 Q. BY MR. LEVY: DID YOU CHANGE YOUR ATTITUDE TOWARD
4 THE RELIGIOUS PURPOSE OF THE CHURCH AFTER YOU LEFT THE CHURCH?

5 A. YES, I DID.

6 Q. WOULD YOU TELL US WHAT YOU CHANGED IT TO.

7 A. WELL, I THOUGHT THERE WAS A PURPOSE TO SAVE THE
8 WORLD AND THEN I FOUND OUT IT WAS BASICALLY TO PROTECT AND
9 SUPPORT THE LEADER OF THE CHURCH WHICH IS WHY I LEFT.

10 Q. HAVE YOU MARRIED?

11 A. AM I MARRIED? YES.

12 Q. WERE YOU MARRIED IN THE CHURCH?

13 A. YES, I WAS.

14 Q. DID YOU MEET YOUR WIFE IN THE CHURCH?

15 A. YES, I DID.

16 Q. DID SHE HAVE TO GET ELIZABETH CLARE PROPHET'S
17 PERMISSION TO GET MARRIED?

18 A. YES, SHE DID.

19 Q. IS THAT ONE OF THE RULES AND REGULATIONS OF THE
20 CHURCH?

21 A. YES, IT IS.

22 Q. WAS THERE EVER A TIME WHEN YOU WANTED TO HAVE A
23 CHILD WITH YOUR WIFE?

24 A. YES.

25 Q. DID YOU HAVE TO GET PERMISSION OF THE CHURCH?

26 A. YEARS AGO, YOU DID.

27 Q. DO YOU KNOW GREGORY MULL?

28 A. YES, I DO.

1 Q. WHEN DID YOU MEET HIM?

2 A. I MET HIM WHILE I WAS STILL A STAFF MEMBER IN THE
3 CHURCH.

4 Q. DO YOU REMEMBER WHAT YEAR YOU MET HIM IN?

5 A. FIRST MET HIM I THINK IT WAS '76, '76, SOMETIME IN
6 THERE.

7 Q. DO YOU KNOW A PERSON NAMED KATHLEEN HAMMOND?

8 A. YES.

9 Q. WHO IS SHE?

10 A. SHE WAS ELIZABETH'S PERSONAL SECRETARY AT THE TIME
11 I FIRST MET GREGORY AND THEN BECAME GREGORY'S WIFE AT THE SAME
12 TIME WE WERE MARRIED.

13 Q. AT THE TIME YOU FIRST MET KATHLEEN HAMMOND WOULD
14 YOU CONSIDER YOURSELF AS HAVING BEEN A FRIEND OF GREGORY MULL,
15 CLOSE PERSONAL FRIEND?

16 A. NO.

17 Q. WERE YOU A CLOSE PERSONAL FRIEND OF KATHLEEN
18 HAMMOND?

19 A. NO.

20 Q. DID YOU KNOW HIM WELL? MR. MULL?

21 A. I KNEW HIM WELL AT THE TIME JUST AS A STAFF
22 MEMBER.

23 Q. IF THERE WAS A GENERAL PREVAILING ATTITUDE BY THE
24 STAFF THAT YOU SHARED IN WITH REGARD TO MR. MULL WHAT WAS THAT
25 ATTITUDE?

26 A. AH --

27 MR. KLEIN: I'M GOING TO OBJECT TO THAT. IT CALLS FOR A
28 CONCLUSION FROM THE WITNESS, YOUR HONOR.

1 THE COURT: OH, I THINK YOU MIGHT ASK A COUPLE OF
2 INTRODUCTORY QUESTIONS BEFORE YOU ASK THIS QUESTION.

3 MR. LEVY: YES, YOUR HONOR.

4 Q. DID YOU PERSONALLY HAVE AN ATTITUDE ABOUT GREGORY
5 MULL WHEN YOU MET HIM?

6 A. NOT IMMEDIATELY WHEN I MET HIM.

7 Q. HAD YOU HEARD THINGS ABOUT HIM?

8 A. WHEN I FIRST MET HIM, AS I SAID, I WAS ON THE
9 STAFF AND I RESPECTED HIM VERY MUCH. HE -- AS I RECALL THE
10 REASON HE CAME ON THIS STAFF WAS TO DO ARCHITECTURAL WORK FOR
11 THE PLANS THEY HAD FOR BUILDING UP THEIR MALIBU PROPERTY INTO
12 THE HEADQUARTERS, A SPECIAL PLACE, AND SO I THOUGHT VERY HIGHLY
13 OF HIM FOR THAT.

14 Q. WHEN DID YOU GET MARRIED?

15 A. DECEMBER OF 1977.

16 Q. ANYBODY ELSE GET MARRIED AT THE SAME TIME YOU DID?

17 A. YES.

18 Q. WHO?

19 A. THERE WERE SEVEN COUPLES AND GREGORY AND HIS WIFE
20 KATHLEEN WERE ONE OF THOSE COUPLES.

21 Q. AT THAT TIME DECEMBER OF 1977, DID YOU HAVE
22 OCCASION TO OBSERVE MR. MULL AND HIS PHYSICAL CONDITION AND
23 EMOTIONAL CONDITION?

24 A. HE WAS A VERY HAPPY MAN. HE WAS VERY MUCH
25 INVOLVED WITH THE TEACHINGS AND VERY BRILLIANT. HE WAS -- FELT
26 VERY -- HE OBVIOUSLY FELT VERY PROUD TO BE THERE AND TO GET
27 MARRIED AND MOVE UP IN THE EYES OF THE ORGANIZATION. IN OTHER
28 WORDS, AS A MARRIED PERSON YOU KIND OF GO UP A NOTCH OR TWO.

1 THAT'S PART OF THEIR TEACHINGS.

2 Q. WHERE WERE YOU LIVING IN 1979?

3 A. I WAS LIVING ON THE PROPERTY AT MALIBU.

4 Q. WHAT'S THAT PROPERTY KNOWN AS?

5 A. CAMELOT.

6 Q. ON THAT PROPERTY AT CAMELOT WHEN YOU WERE LIVING
7 THERE WERE THERE PEOPLE LIVING THERE WHO PARTICIPATED FOR THE
8 CHURCH IN PUBLISHING ENTERPRISE?

9 A. YES.

10 Q. WHAT ABOUT WRITING ENTERPRISE?

11 A. YES.

12 Q. EDITING?

13 A. YES.

14 Q. TYPESETTING?

15 A. UH-HUH.

16 Q. PRINTING?

17 A. YES.

18 Q. COLLATING?

19 A. YES.

20 Q. PHOTOGRAPHY?

21 A. YES.

22 Q. CONSTRUCTION?

23 A. YES.

24 Q. FUNDRAISING?

25 A. YES.

26 Q. DID YOU EVER WORK IN FUNDRAISING YOURSELF?

27 A. NOT DIRECTLY.

28 Q. WERE THE PEOPLE WHO WERE EMPLOYED THEREIN WORKING

1 WITH COMPUTERS?

2 A. YES.

3 Q. IF YOU HAD TO COME TO A GENERAL CONCLUSION AS TO
4 WHAT THE PRIME PURPOSE OF YOUR WORKING FOR CHURCH UNIVERSAL AND
5 TRIUMPHANT WAS COULD YOU DO SO?

6 A. WELL, IT WAS TOLD TO ME RIGHT FROM THE BEGINNING
7 OF MY BEING A MEMBER THAT IT WAS TO SUPPORT THE MESSENGER.
8 THAT'S WHAT BEING A STAFF MEMBER WAS, YOU'RE A STAFF OF GOD BUT
9 YOU ARE PARTICULARLY A STAFF FOR THE MESSENGER, A ROD, A
10 PHYSICAL ROD FOR THE MESSENGER. YOU WERE TO HOLD THEM UP,
11 SUPPORT THEM IN EVERY WAY.

12 EVENTUALLY, THE IDEA YOU WERE EXPECTED TO GIVE
13 YOUR LIFE FOR THEM LITERALLY IN EVERY WAY -- SPIRITUALLY,
14 PHYSICALLY, IF NECESSARY, SO THAT THE WHOLE IDEA OF MY BEING A
15 STAFF MEMBER WAS REALLY TO SERVE THAT LEADER AND I BELIEVE THAT
16 ABSOLUTELY AND I DID THAT WHILE I WAS THERE.

17 Q. WE MENTIONED A NUMBER OF DIFFERENT OCCUPATIONS
18 THAT PEOPLE HAD THERE. ABOUT HOW MANY PEOPLE WERE LIVING ON
19 CAMELOT WHEN -- SAY, IN THE YEAR 1980?

20 A. FOUR HUNDRED OR SO PEOPLE.

21 Q. WHAT WAS THE AVERAGE SALARY PER MONTH FOR PEOPLE
22 WORKING AND LIVING WHO WERE PERMANENT STAFF AT THAT TIME?

23 A. ABOUT \$33 FOR MOST PEOPLE. OTHER PEOPLE GOT MORE.

24 Q. DID THERE COME A TIME TO YOUR KNOWLEDGE WHEN
25 GREGORY MULL MOVED TO THE CAMPUS AT CAMELOT?

26 A. YES. HE MOVED THERE I THINK WITHIN ABOUT A YEAR
27 OR SO AFTER WE GOT MARRIED AND HE LIVED IN THE SAME BUILDING WE
28 DID AND IT WAS CALLED THE CHAPEL OF THE HOLY GRAIL AND WE LIVED

1 ON THE THIRD FLOOR AND HE LIVED DOWN THE HALL FROM US.

2 Q. DID YOU HAVE BIG LUXURIOUS KIND OF LIKE THE HILTON
3 HOTEL ACCOMODATIONS?

4 A. NO, WE HAD A ROOM THAT WAS ABOUT FROM HERE TO THAT
5 WALL.

6 Q. WHEN GREGORY MULL FIRST CAME --

7 MR. KLEIN: CAN THE RECORD REFLECT THE WITNESS POINTED
8 TO THE FAR WALL OF THE COURTROOM --

9 THE WITNESS: ABOUT 6 BY 10. IT WAS NOT EVEN THAT BIG.

10 Q. BY MR. LEVY: WHEN GREGORY MULL MOVED TO CAMELOT
11 DID YOU KNOW ANYTHING ABOUT HIM PERSONALLY?

12 A. YES, I DID. AT THAT TIME I KNEW ABOUT IT BECAUSE
13 WE HAD ALREADY HEARD INDIRECTLY ABOUT HIS PERSONAL LIFE THROUGH
14 STAFF MEETINGS THAT HAD OCCURRED REGARDING HIS WIFE AT THE TIME
15 KATHLEEN AND WE WERE APPRAISED OF HIS SITUATION AS AN ARCHITECT
16 AND THAT HE WAS ENGAGED BY THE CHURCH TO DO THAT WORK, AND
17 THAT'S HOW I KNEW ABOUT HIS PERSONAL AFFAIRS AND WHY HE HAD
18 COME.

19 Q. DID GREGORY MULL AND HIS WIFE KATHLEEN MULL LIVE
20 TOGETHER?

21 A. YES, THEY DID.

22 Q. DID BOTH OF THEM REMAIN AT CAMELOT THROUGHOUT THE
23 YEAR 1979?

24 A. NOT TO MY KNOWLEDGE. ONE OF THEM WAS ALWAYS --
25 SEEMED TO BE TRAVELING BACK AND FORTH TO SAN FRANCISCO, I
26 BELIEVE.

27 Q. DID THERE COME A TIME WHEN KATHLEEN MULL LEFT
28 CAMELOT?

1 A. YES.

2 Q. WAS THERE A PREVAILING OPINION ABOUT MR. MULL AT
3 THE TIME KATHLEEN MULL LEFT CAMELOT?

4 A. YES. HE WAS THOUGHT VERY HIGHLY OF.

5 MR. KLEIN: I WILL OBJECT AS VAGUE AND AMBIGUOUS.

6 THE COURT: SUSTAINED.

7 Q. BY MR. LEVY: WHAT DID YOU THINK ABOUT MR. MULL
8 STAYING AT CAMELOT AFTER HIS WIFE LEFT?

9 A. I THOUGHT THAT WAS A TREMENDOUS THING PERSONALLY.
10 HE APPARENTLY STAYED WHEN HIS WIFE LEFT BECAUSE HE WAS MORE --
11 THE SAME PROBLEM I WAS IN. HE WAS MORE DEVOTED TO THE LEADER
12 THAN HE WAS TO HIS WIFE. I THOUGHT A LOT OF HIM FOR THAT.

13 Q. WHEN KATHLEEN MULL LEFT WERE THERE STAFF MEETINGS
14 AT THAT TIME?

15 A. YES, THERE WERE.

16 Q. WERE THE PERSONAL AFFAIRS OF MR. MULL AND HIS WIFE
17 DISCUSSED AT THOSE STAFF MEETINGS?

18 A. YES. A LOT OF DETAIL.

19 Q. WHO GENERALLY PARTICIPATED IN THOSE MEETINGS?

20 A. PERMANENT STAFF MEMBERS.

21 Q. AND WHAT WOULD SOME OF THEIR NAMES BE?

22 A. WELL, MONROE SHEARER, ED FRANCIS, MYSELF, A NUMBER
23 OF THE PEOPLE -- TIM CONNOR, MARGARET WRIGHTCART, ANN PROPHET,
24 ROBERT WARBECK, RICHARD GAFGIN, ABOUT HALF OF THE PEOPLE HERE.
25 WILLIAM -- I FORGOT HIS LAST NAME.

26 Q. WAS IT A COMMON PRACTICE AT THE CHURCH AT THAT
27 TIME TO DISCUSS THE PERSONAL AFFAIRS OF DEPARTED MEMBERS?

28 A. ABSOLUTELY.

1 Q. WHY WAS IT DONE?

2 MR. KLEIN: I WOULD OBJECT. THAT CALLS FOR A
3 CONCLUSION, YOUR HONOR.

4 THE COURT: SUSTAINED.

5 MR. KLEIN: I DON'T KNOW IF THERE IS A FOUNDATION FOR
6 IT.

7 Q. BY MR. LEVY: IF A PERSON WAS ASKED TO LEAVE THE
8 CHURCH WOULD IT BE UNUSUAL FOR THAT PERSON TO BE DISCUSSED IN
9 THE STAFF MEETINGS AFTER THEY HAD LEFT?

10 A. NO.

11 Q. DID YOU KNOW THAT IF YOU LEFT YOU MIGHT BE
12 DISCUSSED, YOU AND YOUR WIFE AND YOUR PERSONAL AFFAIRS?

13 A. YES, I DID.

14 Q. DID THAT KNOWLEDGE HAVE ANY EFFECT ON YOU?

15 A. YEAH. IT DIDN'T MAKE ME FEEL VERY GOOD, BUT I
16 DIDN'T HAVE MUCH CHOICE.

17 Q. DID ANYBODY THAT WAS IN THE UPPER ECHELON AND IN
18 THAT I WOULD INCLUDE ELIZABETH CLARE PROPHET AND ED FRANCIS AND
19 MONROE SHEARER DID ANYONE IN THAT GROUP DIRECT THE GENERAL
20 MEMBERSHIP HOW GREGORY MULL SHOULD BE CONSIDERED WHEN HE LEFT?

21 A. YES, VERY DEFINITELY.

22 Q. HOW WERE THEY DIRECTED?

23 A. THEY WERE BASICALLY TOLD THAT HE WAS THE PRIME
24 SOURCE OF ANY -- THEY CALLED THE DARKNESS OR DEITY THAT WAS
25 COMING INTO WHAT WAS ALSO CALLED THEIR COMMUNITY AGAINST THE
26 LEADER AND AGAINST THE CHURCH BASICALLY AN ILLUSFARIAN TYPE
27 FORCE, ENERGY WE WOULD HAVE TO ALL DEAL WITH. HE WAS ON THE
28 BLACKLIST. WE DIDN'T CALL IT THAT AT THE TIME BUT THAT'S WHAT

1 HE WAS ON.

2 HE WAS DECREED ABOUT DAY AND NIGHT AND HE WAS AN
3 UNTOUCHABLE, YOU MIGHT SAY. WE WOULDN'T BE ABLE TO TALK OR
4 SPEAK WITH HIM IF WE HAD KNOWN HIM AND HE WAS A FRIEND. HE WAS
5 GONE.

6 Q. WAS HE EVENTUALLY GIVEN A LABEL BY ELIZABETH CLARE
7 PROPHET?

8 A. YES. AS I RECALL THEY HAVE -- THEY CAME OUT OVER
9 THE YEARS FROM ABOUT 1980 WITH WHAT THEY CALLED THE RUBY RAE
10 DECREES IN THAT HE'S REFERRED TO IN THE PERMANENT STAFF
11 MEETINGS AND ALSO AMONGST HIS -- AS WE TALKED AND UNDERSTOOD
12 FROM WHAT HAD BEEN TOLD ABOUT HIM THAT HE WAS REFERRED TO AS
13 THE BEAST OF BLASPHEMY.

14 Q. AFTER HE LEFT THE CHURCH --

15 A. AMONG A FEW OTHER NAMES. I'M SORRY.

16 Q. AFTER MR. MULL LEFT THE CHURCH AND THE CHURCH HAD
17 STAFF MEETINGS WAS ANYTHING OF AN EXTREMELY PERSONAL NATURE
18 THAT WAS IN MR. MULL'S CONFESSION LETTER DISCUSSED WITH THE
19 BOARD?

20 A. YES, IT WAS DISCUSSED WITH THE BOARD AND THEN
21 RELAYED TO US IN A PERMANENT STAFF MEETING.

22 Q. DID YOU EVENTUALLY LEAVE CHURCH UNIVERSAL
23 TRIUMPHANT?

24 A. YES, I DID.

25 Q. DID ANYONE PHYSICALLY KEEP YOU AT CAMELOT WHEN YOU
26 LEFT?

27 A. NOT PHYSICALLY, NO.

28 Q. COULD YOU HAVE LEFT IF YOU WANTED TO EASILY?

1 A. NO. I COULDN'T HAVE LEFT EASILY OR EVEN IF I HAD
2 WANTED TO BECAUSE I ACTUALLY WANTED TO A NUMBER OF TIMES BUT I
3 COULDN'T DO IT.

4 Q. WHAT WAS IT THAT KEPT YOU THERE?

5 A. FEAR OF WHAT THEY CALL THE SECOND DEATH, FEAR OF
6 NOT SERVING THIS WOMAN ELIZABETH PROPHET, THE LEADER OF THE
7 ORGANIZATION, THE CULT, AND THEREBY LOSING THIS OPPORTUNITY
8 TO -- SUPPOSED TREMENDOUS OPPORTUNITY FOR NOT ONLY SAVING HER
9 BUT THE WHOLE ORGANIZATION AND THE PLANET. IT'S PRETTY HEAVY
10 AND, YOU KNOW, LOSING MY SOUL WAS KIND OF A SMALL PART OF IT.
11 IT WAS THE PROBLEMS I WAS GOING TO CREATE FOR THE REST OF THE
12 WORLD.

13 Q. YOU EVENTUALLY LEFT THE CHURCH THOUGH?

14 A. YES.

15 Q. WHY?

16 A. I GOT THE SENSE IN 1982. '83 WHEN I WAS RECEIVING
17 INFORMATION FROM THE CHURCH ABOUT THEIR MONTANA PROPERTY CALLED
18 THE INNER RETREAT THROUGH AN INFORMATION REPORT THEY SENT OUT
19 WHICH BASICALLY THEY WANTED VERY PRACTICAL FAVORS BESTOWED UPON
20 THE CHURCH AND VERY LITTLE FOR THE MEMBERS THAT WERE DOING ALL
21 THE WORK AND THE SUPPORT, IN OTHER WORDS, YOU COULD PUT YOUR
22 MONEY INTO THAT PLACE AND MOVE THERE AND GET THERE AND THEN IF
23 YOU DIDN'T FOLLOW THROUGH WITH THE SPIRITUAL DISCIPLINES YOU
24 COULD BE GIVEN 90 DAYS NOTICE AND YOU WOULD HAVE TO CLEAR OUT
25 AND OBVIOUSLY LEAVE EVERYTHING THAT YOU PUT INTO IT THERE.
26 THAT WAS JUST ONE ASPECT.

27 THERE WERE MANY OTHER CLAUSES IN THAT GENERAL
28 INFORMATION REPORT FOR THAT PROPERTY THAT, YOU KNOW, THEY

1 CALLED -- I THINK THEY CALL THE LEADER THE GRANTOR. BIG DEAL.
2 IT WAS JUST A NAME. BUT ANYWAY IT'S HER. SHE'S THE HEAD OF
3 THE CHURCH. SHE HAS EVERYTHING AND NUMEROUS CLAUSES REFERRING
4 TO AND THE GRANTOR WILL HAVE THIS FAVOR AND THAT FAVOR. TOO
5 MUCH. IT BECAME OBVIOUS TO ME AT THAT POINT I HAD ALREADY DONE
6 A LOT OF SERVICE AND FINANCIAL GIVING OF MONEY AND I HAD IT AT
7 THAT POINT.

8 Q. WHILE YOU WERE AT THE CHURCH DID THE CHURCH EVER
9 INVOLVE ITSELF IN ANY CHARITABLE ACTIVITIES?

10 A. NO.

11 Q. DID THEY EVER DO ANYTHING TO BENEFIT ANYONE
12 OUTSIDE OF THE CHURCH?

13 A. NO.

14 Q. DID THEY EVER DO ANYTHING TO BENEFIT ANYONE INSIDE
15 OF THE CHURCH OTHER THAN PAY THEIR \$33 A MONTH OR FOOD OR
16 PROVIDE THE ROOM?

17 A. AT THE TIME I THOUGHT THEY WERE BENEFITING PEOPLE
18 IN THE CHURCH BUT IT WAS A SPIRITUAL BENEFIT. WE HAD TO
19 SUPPORT OURSELVES. WE HAD TO GO OUT AND WORK. WE HAD TO HAVE
20 ONE FULL-TIME JOB OUT ANOTHER FULL-TIME JOB IN. IT WAS VERY
21 DIFFICULT.

22 Q. WHEN WAS IT THAT YOU ACTUALLY LEFT THE CHURCH?

23 A. APRIL OF 1983.

24 Q. AFTER YOU LEFT THE CHURCH WERE YOU CONTACTED BY
25 ANYONE WITHIN THE CHURCH?

26 A. YES.

27 Q. TELL US THE CIRCUMSTANCE AND THE NATURE OF THAT
28 CONTACT.

1 A. I WAS -- I RECEIVED A TELEPHONE CALL IT WAS A
2 PARTY CALL ONE EVENING A WEEK -- LET ME SEE. I THOUGHT IT WAS
3 ABOUT A WEEK AFTER I SENT MY LETTER OF RESIGNATION IN THE CALL
4 CAME FROM TIMOTHY CONNOR AND HE HAD A MEMBER OF THE CHURCH THAT
5 WAS IN OKLAHOMA IN THE SAME TOWN I WAS IN ALSO ON THE LINE AND
6 THEY WERE TALKING TO ME TOGETHER AND COMMENTING ABOUT THE
7 RESIGNATION LETTER I HAD SENT IN WHICH HAD SAID I DON'T WANT
8 ANYTHING MORE TO DO WITH THE CHURCH, I GIVE YOU BACK ALL YOUR
9 BLESSINGS AND YOUR VIEWS YOU GAVE ME, IF YOU CONTACT ME ANY
10 MORE I WILL CONSIDER IT HARASSMENT AND I WILL CONSIDER SUING
11 YOU AND I MEAN I WANTED TO MAKE IT CLEAR THAT I WAS LEAVING.

12 SO A WEEK LATER I GET A CALL BACK AND TIMOTHY
13 CONNOR SAID MOTHER HAS GOT YOUR LETTER, SHE WANTS YOU TO KNOW
14 IF YOU TALK TO ANYBODY IN THE CHURCH SHE'S ALSO GOING TO SUE
15 YOU AND FILE SUIT AND I SHOOK FOR HALF HOUR AFTER I GOT THAT,
16 YOU KNOW, THIS IS THE LEADER OF GOD INCARNATE AND I'M STILL
17 THICK INTO IT AT THAT POINT. I GOT INTIMIDATED.

18 Q. AS A RESULT OF YOUR CHURCH EXPERIENCE DID YOU AND
19 YOUR WIFE REQUIRE COUNSELING?

20 A. YES, WE DID.

21 Q. DID YOU GET COUNSELING?

22 A. YES.

23 Q. FOR HOW LONG?

24 A. IT'S BEEN ABOUT THREE YEARS NOW.

25 Q. ARE THERE STILL RESIDUAL EFFECTS WITHIN YOU OF
26 YOUR AFFILIATION WITH THE CHURCH UNIVERSAL AND TRIUMPHANT?

27 A. YES. THERE ARE.

28 Q. CAN YOU EXPLAIN TO THE COURT AND THE JURY WHAT

1 SOME OF THOSE ARE.

2 A. WELL, BASICALLY A LOT OF RESIDUAL FEAR. OF
3 COURSE, THEY WOULD EAT THAT STUFF UP. THEY THRIVE ON THAT.
4 JUST FEAR ABOUT MY FUTURE. I THINK I HAVE GOTTEN THROUGH A LOT
5 OF THAT. I RESPECT MYSELF A LOT MORE NOW. BUT THERE IS STILL
6 FEAR OF WHETHER I'M MAKING THE RIGHT MOVE WITH MY LIFE BECAUSE
7 PREVIOUSLY I ALWAYS HAD TO CHECK WITH THE LEADER. CAN'T DO
8 THAT NOW. DON'T WANT TO DO IT NOW. BUT IT'S A PROBLEM. I
9 HAVE TO BE -- NOW I HAVE TO BE RESPONSIBLE FOR MYSELF AND
10 CONDUCT MY OWN LIFE AND IT'S A PROBLEM NOT TO HAVE SOMEBODY TO
11 LEAN ON, TO TELL YOU EXACTLY WHAT TO DO.

12 Q. WOULD YOU SAY THAT DURING YOUR YEARS IN THE CHURCH
13 NOT ONLY YOU BUT MOST OF THE MEMBERS GAVE UP THEIR FREE WILL TO
14 MAKE THEIR OWN DECISIONS. RELINQUISHED THAT TO ELIZABETH CLARE
15 PROPHET?

16 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT AS TO THIS
17 WITNESSES'S ABILITY TO TELL ABOUT OTHER MEMBERS AND HE HAS
18 ANSWERED IT. IF YOUR HONOR WOULD GRANT THE OBJECTION, I WILL
19 ASK IT BE STRICKEN.

20 THE COURT: SUSTAINED.

21 LAST ANSWER OF THE WITNESS IS STRICKEN. THE JURY
22 IS DIRECTED TO DISREGARD IT.

23 Q. BY MR. LEVY: LET ME ASK THAT QUESTION
24 SPECIFICALLY OF YOU.

25 DURING YOUR TIME IN THE CHURCH DID YOU FEEL YOU
26 GAVE UP YOUR OWN FREE WILL TO MAKE DECISIONS WITH REGARD TO
27 YOUR LIFE AND YOU FOLLOWED THE DICTATES OF ELIZABETH CLARE
28 PROPHET?

1 MR. KLEIN: OBJECT AS TO THE LEADING NATURE OF THAT
2 QUESTION.

3 THE WITNESS: ABSOLUTELY.

4 THE COURT: OBJECTION SUSTAINED.

5 Q. BY MR. LEVY: NOW THAT YOU HAVE LEFT THE CHURCH DO
6 YOU HAVE A CONCERN FOR YOUR SOUL?

7 A. A LITTLE.

8 Q. DO YOU TRUST GOD ENOUGH TO WORK WITH YOU DIRECTLY
9 AND NOT THROUGH ELIZABETH CLARE PROPHET TO DO WHAT'S RIGHT AND
10 PROPER FOR YOU?

11 A. IT'S DIFFICULT TO ANSWER. BUT I THINK I'M --
12 THAT'S MORE OR LESS WHERE I'M AT. I WOULD SAY, YEAH.

13 MR. LEVY: THANK YOU, MR. TROWBRIDGE. I HAVE NOTHING
14 FURTHER FOR YOU ON DIRECT.

15 MR. KLEIN: YOUR HONOR, MAY I HAVE ONE MOMENT PLEASE.

16 (MR. KLEIN CONSULTS WITH CLIENT.)

17 NO QUESTIONS, YOUR HONOR.

18 THE COURT: ALL RIGHT. YOU'RE EXCUSED. THANK YOU.

19 MR. LEVY: YOUR HONOR, MAY THIS WITNESS REMAIN IN THE
20 COURTROOM IF MR. KLEIN HAS NO OBJECTION?

21 MR. KLEIN: NO OBJECTION.

22 THE COURT: THAT'S AGREEABLE.

23 MR. LEVY: AT THIS TIME, YOUR HONOR, WE WOULD CALL
24 KATHLEEN MUELLER TO THE STAND.

25 /

26 /

27 /

28 /

1 KATHLEEN MUELLER, +
2 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
3 AS FOLLOWS:

4 THE CLERK: PLEASE BE SEATED IN THE WITNESS STAND.
5 PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR
6 FIRST AND LAST NAME.

7 THE WITNESS: KATHLEEN WITH A K, K-A-T-H-L-E-E-N, MIDDLE
8 INITIAL E. MUELLER, M-U-E-L-L-E-R-

9 THE CLERK: THANK YOU.

10

11 DIRECT EXAMINATION +

12 BY MR. LEVY:

13 Q. MISS MUELLER --

14 A. YES.

15 Q. -- DO YOU KNOW GREGORY MULL?

16 A. YES.

17 Q. HOW LONG HAVE YOU KNOWN HIM?

18 A. ABOUT 18 YEARS.

19 Q. DID YOU KNOW HIM IN 1974?

20 A. YES.

21 Q. CAN YOU DESCRIBE TO THE COURT WHAT KIND OF MAN HE
22 WAS IN 1974 FROM YOUR PERSPECTIVE.

23 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS VAGUE AND
24 AMBIGUOUS.

25 THE COURT: SUSTAINED.

26 MR. LEVY: WOULD YOU TELL US HOW YOU SAW HIM PHYSICALLY
27 AND EMOTIONALLY IN 1974.

28 A. YES. HE WAS VERY FULL OF LIFE. HE SEEMED TO

1 ENJOY LIFE A GOOD DEAL. HE WORKED VERY HARD. I SAW HIM AS A
2 HARD WORKER AND A PERSON WHO ENJOYED HIMSELF A GOOD DEAL, JUST
3 VIBRANT.

4 Q. DID YOU KNOW HIM IN 1975?

5 A. YES.

6 Q. DID YOU EVER BECOME AWARE THAT HE MADE AN
7 AFFILIATION WITH A CHURCH?

8 A. YES.

9 Q. DO YOU KNOW THE NAME OF THAT CHURCH?

10 A. YES.

11 Q. WHAT'S THE NAME OF THE CHURCH?

12 A. CHURCH UNIVERSAL AND TRIUMPHANT. IT WAS AT THAT
13 TIME HOWEVER CALLED SUMMIT LIGHTHOUSE.

14 Q. TO YOUR KNOWLEDGE DID HE EVER ATTEND SOMETHING
15 CALLED SUMMIT UNIVERSITY?

16 A. YES.

17 Q. DO YOU RECALL WHEN THAT WAS?

18 A. I THINK IT WAS IN 1975.

19 Q. HOW DID HE SEEM TO YOU PHYSICALLY AND EMOTIONALLY
20 AFTER HE RETURNED FROM ATTENDING THAT CHURCH SUMMIT UNIVERSITY?

21 A. AFRAID. FOR EXAMPLE, HE DIDN'T WANT ME TO GET
22 VERY CLOSE TO HIM AT ALL. IF WOULD YOU LIKE REACH OUT TO HUG
23 HIM OR SHAKE HIS HAND SOMETHING LIKE THAT HE WOULD JUMP BACK A
24 MILE AND ALIENATED I WOULD SAY. HE SEEMED TO HAVE A VERY
25 DIFFERENT VIEWPOINT OF THE REST OF THE WORLD. HE SEEMED TO
26 FEEL LIKE I'M CLEAN AND YOU'RE DIRTY AND HE SEEMED TO HAVE THAT
27 ATTITUDE TOWARDS ANYONE WHO WAS NOT IN THE CHURCH OR WHO HAD
28 NOT ATTENDED SUMMIT UNIVERSITY.

1 Q. DID YOU EVER ATTEND SUMMIT UNIVERSITY?

2 A. YES.

3 Q. WHEN DID YOU ATTEND SUMMIT UNIVERSITY?

4 A. IN FALL OF 1975 -- NO -- YEAH. '75.

5 Q. DID YOU HAVE A PLEASANT EXPERIENCE AT SUMMIT
6 UNIVERSITY?

7 A. YES.

8 Q. COULD YOU DESCRIBE FOR US BRIEFLY WHAT YOUR LIFE
9 WAS LIKE WHILE YOU WERE ATTENDING SUMMIT UNIVERSITY.

10 A. WELL, YES. WE GOT UP PRETTY EARLY AND WE GAVE
11 DECREES IN THE MORNING AND WE ALL ATE TOGETHER AND THEN WE
12 WOULD HAVE CLASSES AND THEN WE WOULD, YOU KNOW, BREAK FOR LUNCH
13 AND DECREE SOME MORE AND HAVE SOME MORE CLASSES AND THEN WE
14 WOULD STUDY IN THE EVENINGS.

15 Q. HOW MANY DAYS A WEEK DID YOU DO THAT?

16 A. FIVE.

17 Q. WHEN YOU FIRST WENT -- WHERE WAS SUMMIT UNIVERSITY
18 HELD FOR YOU THAT YEAR?

19 A. IN COLORADO SPRINGS.

20 Q. WERE YOUR CHILDREN WITH YOU AT SUMMIT UNIVERSITY?

21 A. NO.

22 Q. DID YOUR CHILDREN EVER JOIN YOU WHEN YOU WERE WITH
23 THE CHURCH?

24 A. YES. MY CHILDREN JOINED ME AFTER I GOT OUT OF
25 SUMMIT UNIVERSITY AND JOINED THE STAFF. I LEFT COLORADO AND
26 CAME BACK TO CALIFORNIA AND PICKED UP MY CHILDREN, JOINED THE
27 STAFF AND WENT BACK TO COLORADO.

28 Q. WERE -- WHAT KIND OF FACILITIES WERE PROVIDED FOR

1 YOU AND YOUR CHILDREN WHEN YOU WERE ON STAFF?

2 A. WELL, WHEN WE FIRST WENT ON STAFF IN COLORADO
3 SPRINGS THERE WAS A MOTEL THAT THE STAFF STAYED IN, AT LEAST
4 PART OF THE STAFF, AND MY CHILDREN AND I HAD A MOTEL ROOM.

5 Q. WHEN YOUR CHILDREN FIRST JOINED YOU IN COLORADO
6 SPRINGS WERE EITHER OF YOUR CHILDREN YOUNG?

7 A. YES. LOUISE HAD HAD -- MY OLDEST DAUGHTER HAD HAD
8 RHEUMATOID ARTHRITIS WHEN SHE WAS 17 MONTHS OLD. IN FACT I HAD
9 BEEN VERY CONCERNED ABOUT TAKING HER TO COLORADO BECAUSE I
10 DIDN'T KNOW HOW THE COLD WEATHER THERE WOULD AFFECT HER
11 ARTHRITIS AND I WAS ADVISED TO CHECK WITH HER DOCTOR WHICH I
12 DID AND HE SAID, YOU KNOW, TAKE HER AND TRY IT SO I DID.
13 SHORTLY AFTER WE ARRIVED THERE --

14 Q. EXCUSE ME, MA'AM. I THINK YOU HAVE ANSWERED MY
15 QUESTION.

16 WHEN YOU DID ARRIVE IN COLORADO SPRINGS WAS IT A
17 REQUIREMENT OF THE CHURCH THAT YOU AND YOUR CHILDREN ATTEND
18 DECREE SESSIONS?

19 A. YES.

20 Q. WAS THERE AN INCIDENT IN COLORADO SPRINGS THAT WAS
21 UPSETTING TO YOU WITH REGARD TO ATTENDING DECREE SESSIONS?

22 A. YES.

23 Q. WOULD YOU TELL THE COURT WHAT THAT WAS.

24 MR. KLEIN: YOUR HONOR, I DON'T KNOW WHAT THE INCIDENT
25 WAS BUT I WOULD OBJECT AS TO THE RELEVANCE OF SOME INCIDENT
26 THAT MR. MULL WASN'T INVOLVED IN.

27 THE COURT: SUSTAINED.

28 Q. BY MR. LEVY: YOU HAVE DESCRIBED YOUR EXPERIENCE

1 AT SUMMIT UNIVERSITY AS PLEASANT. WHEN YOU WERE IN COLORADO
2 SPRINGS WAS THE TREATMENT AFFORDED YOU AND YOUR CHILDREN
3 PLEASANT?

4 A. NO.

5 Q. WOULD YOU TELL US WHAT HAPPENED THERE.

6 MR. KLEIN: I'M GOING TO OBJECT AS TO THE RELEVANCE AND
7 ALSO OBJECT AS TO 787 OF THE EVIDENCE CODE.

8 THE COURT: WHAT?

9 MR. KLEIN: I'LL OBJECT AS TO THE RELEVANCE, YOUR HONOR,
10 AGAIN NOT KNOWING WHAT THIS INCIDENT IS GOING TO BE.

11 THE COURT: WELL, I DON'T KNOW WHAT THE ANSWER IS
12 EITHER, BUT WE'RE GOING TO FIND OUT. OVERRULED.

13 Q. BY MR. LEVY: WHY DON'T YOU TELL US WHAT HAPPENED.

14 A. WELL, SHORTLY AFTER WE ARRIVED WE BECAME ILL AND I
15 HAD THE FLU, MY DAUGHTER HAD THE FLU AND I HAD BEEN RUNNING A
16 GOOD SIZE FEVER AND NOT FEELING WELL SO I KEPT MY DAUGHTER HOME
17 WITH ME, DID NOT GO TO DECREES AND MY DAUGHTER WENT TO THE
18 KITCHEN TO GET SOMETHING AND SOMEONE SAW HER THERE AND NOTIFIED
19 APPARENTLY THE PEOPLE AT HEADQUARTERS WHICH WAS LOCATED IN
20 ANOTHER AREA OF COLORADO SPRINGS THAT SHE WAS THERE AND NOT IN
21 DECREES AND SHE WAS ORDERED TO GO TO DECREES AND SOMEONE CAME
22 TO THE MOTEL ROOM, A MAN WAS SENT, AND HE CAME AND HE GOT THERE
23 SOMETHING LIKE AROUND 9:00 O'CLOCK AT NIGHT AND HE SAID SHE HAD
24 TO GO TO DECREES.

25 WELL I KNEW EVEN DECREES WERE VERY PROBABLY NEARLY
26 OVER. IN FACT IT SEEMS TO ME IT WAS A SERVICE -- IT MIGHT HAVE
27 BEEN LIKE A WEDNESDAY NIGHT SERVICE, SOMETHING LIKE THAT SHE
28 HAD TO BE AT. BUT ANYWAY I SAID WELL MY DAUGHTER HAS BEEN ILL.

1 HE SAYS WELL MOTHER ORDERED ME TO BRING HER AND SO THESE ARE
2 ORDERS DIRECT FROM THE MESSENGER, YOU KNOW, SHE HAS TO GO.

3 Q. DID YOU AND YOUR DAUGHTERS GO TO SERVICES?

4 A. MY DAUGHTERS AND I WENT TO SERVICES. MY DAUGHTER
5 WENT THAT NIGHT OVER MY OBJECTIONS.

6 MR. KLEIN: YOUR HONOR, NOW THAT I HAVE HEARD IT I WOULD
7 ASK IT BE STRICKEN AS NOT RELEVANT TO THIS CASE.

8 THE COURT: OVERRULED.

9 Q. BY MR. LEVY: WERE THERE ANY RESTRICTIONS UPON YOU
10 WITH REGARD TO CORRESPONDING WITH YOUR FAMILY WHILE YOU WERE IN
11 COLORADO SPRINGS?

12 A. YES. WE WERE NOT TO CORRESPOND WITH OUR FAMILIES.

13 Q. WERE YOU EVER EXPLAINED THE REASON WHY YOU WERE
14 NOT TO CORRESPOND WITH YOUR FAMILY?

15 A. WELL, MY MOTHER REALLY WASN'T MY MOTHER AND MY
16 FATHER REALLY WASN'T MY FATHER AND, YOU KNOW, I REALLY HAD THE
17 WORLD MOTHER AND I HAD LIKE A NEW FAMILY NOW AND THE PEOPLE IN
18 THE WORLD AND OF THE WORLD WERE LIKE DIFFERENT FROM US. WE HAD
19 TO COME APART AND BE A SEPARATE AND CHOSEN PEOPLE.

20 Q. AFTER YOU WENT THROUGH SUMMIT UNIVERSITY DID YOU
21 JOIN THE CHURCH, CHURCH UNIVERSITY AND TRIUMPHANT?

22 A. YES.

23 Q. WHAT WERE THE CIRCUMSTANCES THAT CAUSED YOU TO
24 JOIN THE CHURCH?

25 A. I WANTED TO BELONG.

26 Q. WERE THERE ANY MONETARY REASONS FOR YOUR DECISION?

27 A. YOU MEAN WHY DID I JOIN STAFF?

28 Q. YES, MA'AM.

1 A. IS THAT THE QUESTION?

2 Q. OKAY. YES. WHY DID YOU JOIN THE STAFF OF CHURCH
3 UNIVERSAL AND TRIUMPHANT?

4 A. WELL, I THINK ONE OF THE PRIMARY REASONS WAS I
5 FELT THAT IT WAS A GOOD PLACE TO TAKE MY CHILDREN. I WAS A
6 WORKING MOTHER ALONE, DIVORCED. AND EVERYDAY WHEN I WENT TO
7 WORK I COULD HARDLY CONCENTRATE ON MY WORK I WAS CONCERNED
8 ABOUT WHAT WAS HAPPENING TO MY CHILDREN BECAUSE THEY WERE OUT
9 IN THE WORLD AND THERE WAS NO PLACE FOR THEM TO GO AFTER
10 SCHOOL. THEY WERE REACHING THE AGE NOW WHERE THEY JUST DID NOT
11 WANT BABY-SITTERS. AND MY DAUGHTER HAD BEEN CHASED HOME FROM
12 SCHOOL AND ACTUALLY RAN OUT OF HER SHOES FROM JR. HIGH SCHOOL.
13 HER LIFE HAD BEEN THREATENED, AND I JUST COULDN'T BEAR THAT
14 KIND OF THING ANYMORE.

15 I ALSO REALIZED THAT I NEEDED TO GET MY OWN LIFE
16 STRAIGHTENED OUT AND I SAW THIS AS AN OPPORTUNITY TO DO THAT.
17 BUT I REALLY WANTED TO BE WITH MY CHILDREN AS MUCH AS I COULD
18 AND I WAS TOLD, YOU KNOW, BRING MY CHILDREN AND THE CHILDREN
19 AND I COULD BE TOGETHER, THE CHILDREN WOULD BE THERE RIGHT
20 WHERE I WAS WORKING. THEY COULD GO TO A SCHOOL THAT THEY WERE
21 GOING TO HAVE FOR THEM, A MONTESSORI SCHOOL WHICH WOULD BE JUST
22 FABULOUS. AND I SAW THIS AS THE PERFECT ANSWER -- THE PERFECT
23 ALTERNATIVE. THE ONLY OTHER ALTERNATIVE WAS WHAT WAS PROBABLY
24 ONE OF OUR GREATEST SOCIAL ISSUE OF TODAY --

25 Q. ASIDE FROM THAT SOCIAL ISSUE WHY DON'T YOU JUST
26 RESPOND TO MY QUESTION. DID YOUR CHILDREN GET TO LIVE WITH
27 YOU?

28 A. AT FIRST, YES.

1 Q. HOW LONG AT FIRST?

2 A. THEY --

3 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THE LINE OF
4 QUESTIONING ABOUT HER CHILDREN AND LIVING WITH HER AS
5 IRRELEVANT.

6 THE COURT: OVERRULED.

7 Q. BY MR. LEVY: YOU MAY ANSWER.

8 A. THEY LIVED WITH ME IN COLORADO SPRINGS AND THEN
9 WHEN WE MOVED TO PASADENA THEY HAD THEIR OWN ROOMS. THEY WERE
10 WITH THE OTHER CHILDREN FROM MONTESSORI.

11 Q. DID YOU GET TO SPEND TIME WITH THEM DAILY?

12 A. AT MEALS.

13 Q. DID YOU GET TO SPEND TIME --

14 A. I SAW THEM AT MEALS.

15 Q. DID YOU GET TO SPEND TIME WITH THEM IN THE
16 EVENINGS AND ON THE WEEKENDS?

17 A. NO. WE WORKED IN THE EVENINGS AND ON THE WEEKENDS
18 WE WERE SUPPOSED TO HAVE ONE SUNDAY A MONTH THAT WAS FAMILY
19 TIME AND SOMETIMES WE DID AND SOMETIMES WE DIDN'T AND SOMETIMES
20 THAT FAMILY TIME WAS SPENT DOING THINGS LIKE CLEANING THE
21 ASHRAM WHERE THE FAMILY ALL WORKED TOGETHER WHEN WE WERE
22 ASSIGNED JOBS TO DO.

23 Q. WHEN YOU FIRST WENT ON STAFF WHAT DEPARTMENT DID
24 YOU WORK IN?

25 A. I WAS IN THE BOOK DEPARTMENT. THAT'S THE
26 PUBLISHING DEPARTMENT WHERE THEY PUBLISH THE TEACHINGS OF THE
27 CHURCH AND THEY HAD AN ACCOUNTING DEPARTMENT THERE AND I WENT
28 ON STAFF TO HELP OUT IN THE ACCOUNTING.

1 Q. DID YOU EVER DO ANY WORK IN THE FUNDRAISING
2 DEPARTMENT?

3 A. YES.

4 Q. ANY UNUSUAL INCIDENTS OR OCCURRENCES WHILE YOU
5 WERE WORKING IN THE FUNDRAISING DEPARTMENT.

6 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AND ASK FOR AN
7 OFFER OF PROOF IF HE'S GOING TO GO INTO SOMETHING.

8 THE COURT: APPROACH THE BENCH, PLEASE.

9 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE BENCH:)

10 THE COURT: HAVE YOU TAKEN HER DEPOSITION.

11 MR. KLEIN: WHAT'S THAT?

12 THE COURT: HAVE YOU TAKEN HER DEPOSITION?

13 MR. KLEIN: NO.

14 THE COURT: YOU HAVEN'T.

15 MR. KLEIN: NO.

16 THE COURT: WHAT'S THE OFFER OF PROOF?

17 MR. LEVY: YOUR HONOR, WE'RE TALKING ABOUT THE NATURE
18 AND QUALITY OF THIS CHURCH. THERE WAS AN INCIDENT THAT
19 OCCURRED WHEN SHE WAS WORKING IN THE FUNDRAISING DEPARTMENT SHE
20 INQUIRED WHAT THEY WERE RAISING FUNDS FOR AND SHE GOT KICKED
21 OUT OF THE FUNDRAISING DEPARTMENT. I THINK IT GOES TO THE VERY
22 NATURE OF THE ORGANIZATION AND THE FACT THAT IT MAY BE
23 MASQUERADING UNDER THE GUISE OF A CHARITABLE CHURCH BUT --

24 THE COURT: IT MAY WHAT?

25 MR. LEVY: IT MAY BE MASQUERADING UNDER THE GUISE OF A
26 CHARITABLE ORGANIZATION. BUT WHEN THIS LADY FIRST ASKED --

27 THE COURT: IT MAY BE A LOT OF THINGS BUT WE'RE IN TRIAL
28 RIGHT NOW AND I'M NOT GOING TO DEAL WITH SPECULATION.

1 MR. LEVY: IT'S NOT SPECULATION. IT'S ONE QUESTION WITH
2 REGARD TO THIS LADY ASKING A QUESTION AS TO THE PURPOSE OF HER
3 WORK AND FOR THAT QUESTION BEING KICKED OUT OF THE FUNDRAISING
4 DEPARTMENT. AND I WAS GOING TO LIMIT TO THAT ONE QUESTION.

5 THE COURT: BUT WAS SHE SPECIFICALLY TOLD THAT WAS THE
6 REASON OR WAS SHE TRANSFERRED FOR SOME OTHER REASON?

7 MR. LEVY: TO THE BEST OF MY KNOWLEDGE HER INQUIRY WAS
8 THE REASON FOR HER TRANSFER. PURE AND SIMPLE.

9 THE COURT: WELL SHE WOUND UP BEING USED AS PROPHET'S
10 SECRETARY.

11 MR. LEVY: THAT'S RIGHT.

12 THE COURT: THEN SHE WASN'T EXACTLY SENT TO SIBERIA.

13 MR. LEVY: THAT'S RIGHT.

14 THE COURT: OBJECTION SUSTAINED.

15 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT
16 IN THE PRESENCE OF THE JURY:)

17 Q. BY MR. LEVY: MISS MUELLER, HOW LONG DID YOU WORK
18 IN THE FUNDRAISING DEPARTMENT?

19 A. VERY SHORT PERIOD. I DON'T REMEMBER EXACTLY HOW
20 LONG.

21 Q. WITHOUT GOING INTO SPECIFICS AFTER YOU WORKED IN
22 THE FUNDRAISING DEPARTMENT WERE YOU TRANSFERRED TO ANOTHER
23 DEPARTMENT?

24 A. YES.

25 Q. NOW, WITHOUT GOING INTO SPECIFICS WAS THE TRANSFER
26 A PLEASANT ONE OR IN YOUR OPINION WAS IT A PUNITIVE ONE?

27 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT AS TO THE
28 RELEVANCE.

1 THE COURT: ON THAT GROUND OVERRULE.

2 Q. BY MR. LEVY: YOU MAY ANSWER THE QUESTION.

3 MR. KLEIN: I ALSO OBJECT, YOUR HONOR, AS TO HE'S ASKING
4 FOR HER TO DRAW A CONCLUSION. THERE HAS BEEN NO FOUNDATION SHE
5 CAN DRAW THAT CONCLUSION.

6 THE COURT: ON THAT GROUND SUSTAINED.

7 Q. BY MR. LEVY: ON THE BASIS OF YOUR LIVING
8 EXPERIENCE WOULD IT BE YOUR CONSIDERATION THAT THE REASON FOR
9 THE TRANSFER AS YOU SAW IT WAS FOR A PLEASANT REASON OR AN
10 UNPLEASANT REASON?

11 MR. KLEIN: I WILL MAKE THE SAME OBJECTION AS TO LACK OF
12 FOUNDATION FOR THAT ANSWER AND ASKING HER TO DRAW A CONCLUSION,
13 YOUR HONOR.

14 THE COURT: SUSTAINED.

15 Q. BY MR. LEVY: DID THE PERSON WHO MADE THE TRANSFER
16 DO IT OUT OF FRIENDLINESS OR UNPLEASANTNESS?

17 MR. KLEIN: I WILL OBJECT AS TO LACK OF FOUNDATION FOR
18 THAT QUESTION, YOUR HONOR.

19 THE COURT: SUSTAINED.

20 Q. BY MR. LEVY: WHAT DID YOU DO AFTER YOU LEFT THE
21 FUNDRAISING DEPARTMENT?

22 A. I WENT TO WORK WITH NANCY JOHNSON WHO WAS THEN
23 MOTHER'S SECRETARY.

24 Q. YOU SAY YOU WENT TO WORK WITH HER. DID YOU BECOME
25 SECRETARY FOR ELIZABETH CLARE PROPHET ALSO?

26 A. EVENTUALLY.

27 Q. NOW, WITHOUT TELLING ME WHAT WAS TOLD TO YOU OR BY
28 WHOM COULD YOU DESCRIBE FOR ME THE CIRCUMSTANCES UNDER WHICH

1 YOU BECAME ELIZABETH CLARE PROPHET'S SECRETARY.

2 MR. KLEIN: I'M GOING TO OBJECT AS TO VAGUE AND
3 AMBIGUOUS, YOUR HONOR.

4 THE COURT: SHE CAN ANSWER IT.

5 Q. BY MR. LEVY: YOU MAY ANSWER.

6 A. WELL, HOW I BECAME HER SECRETARY OR NANCY'S
7 ASSISTANT?

8 Q. NO. ELIZABETH CLARE PROPHET'S' SECRETARY.

9 A. NANCY JOHNSON FELL OUT OF FAVOR WITH ELIZABETH AND
10 I WAS NANCY'S ASSISTANT AND SO I WAS PROMOTED TO WORKING WITH
11 HER. I DON'T EVEN KNOW IF YOU WOULD CALL THAT A PROMOTION BUT
12 I WAS GIVEN THE JOB THEN OF WORKING DIRECTLY WITH ELIZABETH. I
13 ALSO HAD BEEN TOLD THAT --

14 MR. KLEIN: I'M GOING TO OBJECT IF SHE'S GOING TO GET
15 INTO A STATEMENT THAT SHE WAS TOLD, YOUR HONOR, AS HEARSAY.

16 THE COURT: SUSTAINED.

17 Q. BY MR. LEVY: WOULD YOU JUST LISTEN TO MY QUESTION
18 AND WE WILL KEEP MR. KLEIN FROM JUMPING UP. AND JUST TRY TO
19 ANSWER MY QUESTION AND DON'T TELL US WHAT ANYBODY ELSE SAID.
20 OKAY?

21 HOW MANY HOURS A DAY DID YOU WORK FOR ELIZABETH
22 CLARE PROPHET?

23 A. ABOUT TEN.

24 Q. WERE YOU ON CALL IN THE EVENING?

25 A. YES.

26 Q. DID YOU WORK SEVEN DAYS A WEEK?

27 A. YES.

28 Q. WERE YOU EVER FINED WITH REGARD TO AN INCIDENT

1 THAT HAD TO DO WITH A WASTEBASKET?

2 A. I WASN'T FINED BUT SOMEONE ELSE TOLD ME THEY WERE
3 FINED.

4 Q. DID YOU EVER WITNESS AN INCIDENT WITH A
5 WASTEBASKET?

6 A. YES.

7 Q. AND WOULD YOU TELL US WHAT IT WAS THAT YOU
8 WITNESSED.

9 A. YES.

10 MR. KLEIN: I'M GOING TO OBJECT AS TO THE RELEVANCY OF
11 THE WASTEBASKET INCIDENT, YOUR HONOR.

12 THE COURT: YOU WANT TO MAKE AN OFFER OF PROOF AT THE
13 BAR.

14 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE BENCH:)

15 MR. LEVY: YOUR HONOR, MISS PROPHET HERSELF RESPONDED
16 WITH REGARD TO THE WASTEBASKET INCIDENT AND IT GOES TO SHOW THE
17 DOMINANCE AND CONTROL THAT WAS EXERTED OVER THE PEOPLE AND THE
18 MANIPULATION AND THE CONTROL. BECAUSE THE INCIDENT WAS
19 TESTIFIED TO FIRST SOMEONE WAS FINED FOR PUTTING A LINER IN IT
20 AND THEN SOMEBODY WAS FINED FOR NOT PUTTING A LINER IN IT AND
21 THE ONLY POSSIBLE CONCLUSION AND REASON FOR THAT WAS TO EXERT
22 DOMINANCE AND CONTROL OVER THE PEOPLE.

23 MR. KLEIN: YOUR HONOR, IF I MAY BE HEARD.

24 THE COURT: THIS -- WHAT IS IT?

25 MR. KLEIN: I JUST FAIL TO SEE ANY RELEVANCE TO THIS
26 CASE IN THAT KIND OF AN INCIDENT AND THE CONCLUSION HE'S
27 DRAWING FROM IT.

28 THE COURT: SUBJECT MATTER HAS ALREADY COME UP, HASN'T

1 IT?

2 MR. MIDDLETON: TWICE.

3 THE COURT: THIS MEETING SHOULD HAVE BEEN UNNECESSARY,
4 MR. KLEIN. THE OBJECTION IS OVERRULED.

5 MR. LEVY: THANK YOU, YOUR HONOR.

6 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT
7 IN THE PRESENCE OF THE JURY:)

8 Q. BY MR. LEVY: MRS. MUELLER, YOU WANT TO TELL US
9 ABOUT THE INCIDENCE WITH THE WASTEBASKET NOW?

10 A. YES.

11 Q. PLEASE DO.

12 A. ONE OF THE STAFF MEMBERS CAME IN AND SAW THAT
13 THERE WAS NO LINER, NO PLASTIC LINER IN THE WASTEBASKET, SHE
14 SAID YOU HAD BETTER PUT A PLASTIC LINER IN THE WASTEBASKET
15 BECAUSE MOTHER SAYS IT'S UNSANITARY NOT TO HAVE A PLASTIC LINER
16 IN THE WASTEBASKET AND I WAS FINED FOR NOT HAVING A PLASTIC
17 LINER IN THE WASTEBASKET. SO I SAW THAT WAS TAKEN CARE OF.

18 LATER ANOTHER STAFF MEMBER CAME IN AND SHE SAID
19 WHAT'S THAT LINER DOING IN THE WASTEBASKET IF I WERE YOU I'D
20 TAKE THAT OUT. SHE SAID MOTHER SAYS ONLY PEOPLE FROM THE WRONG
21 SIDE OF THE TRACKS PUT LINERS IN THEIR WASTEBASKETS.

22 Q. WAS SHE FINED ALSO?

23 A. SHE TOLD ME SHE HAD BEEN FINED AS WELL. SO YEAH I
24 THOUGHT THAT WAS VERY FUNNY AND A GOOD WAY TO MAKE MONEY.

25 Q. IN YOUR OPINION WAS IT ALSO A METHOD OF DOMINATION
26 AND CONTROL OVER PEOPLE?

27 MR. KLEIN: OBJECTION AS TO LEADING AND ASKING FOR A
28 CONCLUSION.

1 THE COURT: SUSTAINED.

2 Q. BY MR. LEVY: WHAT DID YOU THINK ABOUT THE WHOLE
3 INCIDENT OTHER THAN WHAT YOU HAVE JUST TOLD US ABOUT THE FINES?

4 A. WELL, IT STARTED ME THINKING ABOUT THE FINES, AND
5 I WAS TRYING TO FIGURE OUT WHAT THE REASONING BEHIND IT WAS. I
6 COULD NEVER FIGURE THAT ONE OUT.

7 Q. DID IT LEAVE YOU IN A STATE OF CONFUSION? DID IT?

8 A. YES.

9 Q. IS YOUR DAUGHTER LOUISE ANEMIC?

10 A. YES. MOST OF THE TIME SHE IS.

11 Q. WHILE YOU AND YOUR DAUGHTERS WERE LIVING WITH THE
12 CHURCH WAS SHE UNDER A DOCTOR'S CARE?

13 A. SHE HAD BEEN UNDER A DOCTOR'S CARE FOR MANY YEARS.

14 Q. AND WITH REGARD TO HER ANEMIA WHAT WERE THE
15 DOCTOR'S INSTRUCTIONS?

16 A. THE DOCTOR'S INSTRUCTIONS TO LOUISE WERE TO EAT
17 RED MEAT AND TO TAKE IRON. I HAD TAKEN LOUISE TO KAISER
18 HOSPITAL TO BE CHECKED OUT BECAUSE SHE HAD KAISER COVERAGE AND
19 SHE HAD BEEN VERY ILL AND WHEN WE GOT BACK AND SHE WAS TOLD TO
20 EAT RED MEAT, YOU DIDN'T EAT RED MEAT UNLESS YOU HAD
21 PERMISSION, YOU KNOW. IT JUST WASN'T AVAILABLE --

22 Q. EXCUSE ME. RATHER THAN TO GET INTO A NARRATIVE
23 ANSWER THE COURT RULES ARE THAT I HAVE TO ASK YOU QUESTIONS SO
24 IF YOU WILL JUST WAIT UNTIL I ASK A QUESTION THEN YOU CAN
25 RESPOND.

26 WERE THERE ANY INCIDENTS AT THE CHURCH WITH REGARD
27 TO LOUISE AND THE NECESSITY FOR HER TO FOLLOW DOCTOR'S ORDERS?

28 A. YES.

1 Q. WOULD YOU TELL US ABOUT THAT.

2 A. YES. LOUISE HAD BECOME ILL WITH THIS RHEUMATOID
3 ARTHRITIS AND AS A RESULT OF THE RHEUMATOID SHE IS ANEMIC AND
4 SHE WAS SERIOUSLY ANEMIC AND THE DOCTOR SAID SHE HAD TO EAT RED
5 MEAT AND TAKE IRON AND SO I ASKED PERMISSION FOR HER TO EAT RED
6 MEAT BUT GETTING THE PERMISSION TO EAT RED MEAT WAS VERY
7 DIFFICULT, EVEN GETTING TO MOTHER TO GET PERMISSION WAS VERY
8 DIFFICULT BECAUSE WHILE I HAD BEEN AT HER HOUSE THE EVENING
9 THAT I WAS GOING TO ASK FOR THE PERMISSION DOING SECRETARIAL
10 WORK I JUST WALKED OUT OF THE HOUSE AND REMEMBERED I HAD
11 FORGOTTEN TO ASK HER WHETHER LOUISE COULD EAT RED MEAT OR NOT
12 AND SO I TURNED AROUND AND KNOCKED ON THE DOOR AND ALEXANDER
13 RICKHART ANSWERED THE DOOR AND I EXPLAINED TO HIM MY SITUATION
14 THAT I NEEDED TO TALK TO MOTHER AND HE SAID HE WOULD TAKE IT UP
15 WITH MOTHER AND I WOULD BE ADVISED LATER.

16 LATER I WAS CALLED INTO MONROE SHEARER'S OFFICE
17 WHO WAS THE ARCHBISHOP OF THE CHURCH AND MONROE SHEARER SAID I
18 HAD VIOLATED STAFF RULES BY TAKING MY DAUGHTER TO AN OUTSIDE
19 DOCTOR, HOW DARE I DO SUCH A THING, WASN'T I AWARE THAT IT WAS
20 STAFF RULES THAT MY DAUGHTER SHOULD GO FIRST TO DR. BOMA THE
21 STAFF CHIROPRACTOR, DR. BOMA SHOULD EXAMINE HER, IF DR. BOMA
22 FOUND SHE NEEDED MEDICAL ATTENTION SHE SHOULD THEN GO TO DR.
23 BURNS, THE PHYSICIAN WHO SAW MOST OF THE STAFF, THEN DR. BURNS
24 WOULD MAKE A JUDGMENT.

25 AND I SAID, WELL, ARE YOU AWARE, MONROE, THAT MY
26 DAUGHTER IS COVERED UNDER KAISER COVERAGE FROM HER FATHER, HER
27 FATHER'S COVERAGE? I AM NONSALARIED ON STAFF AND DR. BOMA
28 CHARGES FOR HIS SERVICES AND DR. BURNS CHARGES FOR HIS SERVICES

1 AND I WOULDN'T EVEN HAVE THE FUNDS TO PAY THEM WITH BECAUSE YOU
2 KNOW, I DON'T EARN ANY MONEY HERE AND IT WAS JUST VERY LOGICAL
3 THAT SHE SHOULD SEE THE PEOPLE WHO HAD ALL OF HER MEDICAL
4 RECORDS THAT HAD BEEN TREATING HER FOR YEARS ANYWAY.

5 WELL -- AND I ASKED HIM, I SAID, BY THE WAY, DO
6 YOU HAVE AN ANSWER FOR ME?

7 AND HE SAID NO HE HAD NO ANSWER FOR ME AND HE
8 STRONGLY REPRIMANDED ME, SAID THAT I SHOULD IN THE FUTURE TAKE
9 HER TO SEE DR. BOMA FIRST.

10 Q. WHILE YOU WERE ON STAFF WAS THERE ANY TIME TO YOUR
11 KNOWLEDGE THAT MAIL WAS WITHHELD FROM YOU?

12 A. YES.

13 Q. WOULD YOU TELL US ABOUT THAT, PLEASE.

14 MR. KLEIN: YOUR HONOR, I WOULD OBJECT, OBJECT AS TO THE
15 RELEVANCE. ALSO OBJECT UNDER 787 OF THE EVIDENCE CODE.

16 THE COURT: OVERRULED.

17 Q. BY MR. LEVY: YOU CAN TELL US.

18 A. I FOUND MAIL ADDRESSED TO ME IN MY SUPERVISOR'S
19 DESK AND I QUESTIONED HIM ABOUT IT AND I REPORTED IT TO A
20 SUPERVISOR AND HE WAS TOLD TO GIVE ME MY MAIL AND I LATER AGAIN
21 FOUND MAIL ADDRESSED TO ME STUCK IN HIS DESK AND I REPORTED IT
22 AGAIN BUT HE -- THAT HE WAS NOT GIVING ME MY MAIL AND HE WAS
23 CALLED IN AND HE WAS REPRIMANDED BY RANDALL KING AND I WAS
24 REPRIMANDED ALSO BECAUSE RANDALL SAID IF YOU TWO CAN'T SETTLE
25 YOUR SQUABBLES WE WILL NEVER GET ANY WORK DONE.

26 Q. DID THERE EVER COME A TIME WHEN YOU LEARNED
27 WHETHER OR NOT MAIL THAT HAD BEEN SENT TO YOU BY ONE OF YOUR
28 PARENTS HAD BEEN RETURNED TO THAT PARENT?

1 A. YES. MY FATHER WROTE ME A LETTER AND IT WAS
2 RETURNED TO HIM NOT AT THIS ADDRESS. I HAD WONDERED WHY I
3 HADN'T HEARD FROM HIM.

4 Q. WERE YOU ACTUALLY AT THAT ADDRESS WHERE THE MAIL
5 WAS ADDRESSED TO?

6 A. YES.

7 Q. OKAY.

8 NOW, WE'RE MOVING TO 1979. WERE YOU LIVING AT
9 CAMELOT IN 1979?

10 A. YES.

11 Q. WHAT WAS YOUR RELATIONSHIP WITH GREGORY MULL IN
12 1979?

13 A. I WAS MARRIED TO HIM AT THE EARLY PART OF 1979.

14 Q. WHEN DID YOU ACTUALLY GET MARRIED TO HIM?

15 A. DECEMBER 24TH, 1977.

16 Q. WHEN YOU FIRST GOT MARRIED TO HIM DID THE TWO OF
17 YOU RESIDE TOGETHER?

18 A. NO.

19 Q. WHERE DID YOU RESIDE?

20 A. I RESIDED ON THE CHURCH STAFF WHEREVER THE CHURCH
21 WAS. WE WERE AT CAMELOT IN DECEMBER 1977 BECAUSE THAT'S WHERE
22 WE WERE MARRIED.

23 Q. WHERE DID MR. MULL RESIDE?

24 A. SAN FRANCISCO.

25 Q. HOW OFTEN DID YOU SEE HIM?

26 A. NOT VERY OFTEN. I WAS SUPPOSED TO BE ABLE TO SEE
27 HIM ONCE OR TWICE A MONTH. I CAN'T REMEMBER IF IT WAS ONCE OR
28 TWICE. BUT I DIDN'T SEE HIM VERY OFTEN BECAUSE I COULDN'T GET

1 AWAY.

2 Q. PRIOR TO MARRYING GREGORY MULL DID YOU DISCUSS THE
3 POSSIBILITY OF MARRYING GREGORY MULL WITH ELIZABETH CLARE
4 PROPHET?

5 A. YES. ON SEVERAL OCCASIONS.

6 Q. AND DID YOU REQUEST PERMISSION TO MARRY GREGORY
7 MULL, REQUEST FROM ELIZABETH CLARE PROPHET PERMISSION FOR THE
8 TWO OF YOU TO GET MARRIED?

9 A. I TOLD HER I WOULD LIKE TO MARRY HIM, YES.

10 Q. DO YOU RECALL WHAT SHE RESPONDED?

11 A. WELL, SHE SAID THAT SHE COULDN'T SPARE ME AT THE
12 MOMENT FROM THE STAFF AND SHE REALLY WOULD LIKE TO SEE ME TAKE
13 SECOND LEVEL AT SUMMIT UNIVERSITY BEFORE I GOT MARRIED BECAUSE
14 GREGORY HAD BEEN THROUGH TWO LEVELS AT THE UNIVERSITY AND I HAD
15 ONLY BEEN THROUGH ONE AND SHE FELT THAT GREGORY SHOULD PAY FOR
16 THAT AND THAT WE COULD TALK ABOUT IT AFTER I GOT THROUGH SECOND
17 LEVEL.

18 Q. DO YOU KNOW WHETHER THERE WERE ANY DISCUSSIONS
19 BETWEEN GREGORY MULL AND ELIZABETH CLARE PROPHET WITH REGARD TO
20 MARRIAGE?

21 A. YES.

22 Q. AS A RESULT OF THOSE DISCUSSIONS DO YOU HAVE ANY
23 KNOWLEDGE OF WHETHER OR NOT ANY FINANCIAL ARRANGEMENTS WERE
24 MADE AS BETWEEN MR. MULL AND ELIZABETH CLARE PROPHET?

25 A. YES.

26 Q. WOULD YOU TELL US WHAT THOSE WERE.

27 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT AS TO THE
28 FOUNDATION.

1 THE COURT: SUSTAINED.

2 Q. BY MR. LEVY: DO YOU KNOW WHETHER OR NOT GREGORY
3 MULL DONATED A SUM OF MONEY TO ELIZABETH CLARE PROPHET?

4 A. YES, HE DID.

5 Q. DO YOU KNOW HOW MUCH IT WAS?

6 A. A THOUSAND DOLLARS.

7 Q. WAS IT SOMETIME AFTER THAT WHEN YOU AND MR. MULL
8 RECEIVED PERMISSION TO GET MARRIED?

9 A. VERY SHORTLY AFTER.

10 Q. CAN YOU TELL US HOW YOU RECEIVED PERMISSION?

11 A. IN A DICTATION.

12 Q. WHAT DOES THAT MEAN?

13 A. THAT MEANS THAT ELIZABETH TAKES A DICTATION FROM
14 AN ASCENDANT MASTER AND ASCENDANT MASTER SPEAKS THROUGH HER AND
15 THERE WAS DICTATION FROM AN ASCENDANT MASTER AND THE ASCENDANT
16 MASTER NAMES THE NAMES OF ALL OF THE PEOPLE THAT THE ASCENDANT
17 MASTER HAD APPROVED TO GET MARRIED AND THIS DICTATION CAME
18 THROUGH ELIZABETH.

19 Q. HOW LONG DID THAT DICTATION -- HOW LONG AFTER MR.
20 MULL MADE HIS DONATION DID THAT DICTATION COME THROUGH
21 ELIZABETH?

22 A. I DON'T KNOW.

23 Q. MATTER OF DAYS OR WEEKS?

24 A. I DON'T KNOW.

25 Q. DID ELIZABETH OR ANYONE ON THE BOARD OF DIRECTORS
26 DISCUSS WITH YOU GREGORY MULL'S ARCHITECTURAL ABILITIES?

27 A. YES.

28 Q. COULD YOU TELL US WHAT THEY SAID AND WHAT YOU

1 SAID.

2 A. THEY ASKED ME IF HE WAS A VERY GOOD ARCHITECT AND
3 I SAID YES I THOUGHT HE WAS A GOOD ARCHITECT.

4 Q. DID THEY EXPLAIN TO YOU WHY THEY WERE INQUIRING?

5 A. NO.

6 Q. IN THE COURSE OF YOUR EMPLOYMENT AS ELIZABETH'S
7 SECRETARY WERE YOU AWARE AS TO WHETHER OR NOT THE CHURCH WAS AT
8 THAT TIME INVOLVED WITH THE USE OF AN ARCHITECTURAL FIRM?

9 A. YES.

10 Q. CAN YOU TELL US WHAT YOUR KNOWLEDGE ABOUT THE
11 ARCHITECTURAL FIRM WAS.

12 A. YES. I DON'T REMEMBER WHO THE ARCHITECTURAL FIRM
13 WAS BUT I KNEW THEY HAD HIRED ONE OR THEY WERE GETTING ONE TO
14 DESIGN THE NEW JERUSALEM.

15 Q. DO YOU REMEMBER HOW MUCH IT WAS SUPPOSED TO COST
16 TO DO ALL THIS DESIGN WORK?

17 A. 3 .3 MILLION I BELIEVE.

18 Q. DO YOU RECALL WHAT THE AMOUNT OF -- ARE YOU SURE
19 ABOUT THE AMOUNT?

20 A. NO.

21 Q. COULD IT HAVE BEEN 33 MILLION?

22 A. YES.

23 Q. IS THAT A MORE ACCURATE FIGURE?

24 A. I REALLY CAN'T REMEMBER THAT WELL. I JUST
25 REMEMBER TWO 3'S.

26 Q. DO YOU RECALL WHAT PERCENTAGE THAT THE
27 ARCHITECTURAL FIRM WAS SUPPOSED TO RECEIVE OF THE TOTAL
28 PROJECT?

1 A. I ONLY KNOW THAT GENERALLY THEY RECEIVED 10
2 PERCENT.

3 Q. AND IF THE PROJECT HAD BEEN A 33 MILLION DOLLAR
4 PROJECT THEN THE ARCHITECTURAL FEE WOULD HAVE BEEN 3 .3 MILLION
5 DOLLARS?

6 A. PROBABLY.

7 Q. DID YOU DISCUSS THE POSSIBILITY OF GREGORY MULL
8 COMING ON STAFF WITH ELIZABETH CLARE PROPHET?

9 A. YES. I ASKED IF GREGORY COULD COME ON STAFF AND
10 SHE SAID THAT HE WAS NOT STAFF MATERIAL.

11 Q. AFTER THE CHURCH DISCOVERED THE COST OF THE
12 ARCHITECTURAL FIRM TO YOUR KNOWLEDGE WAS GREGORY ASKED TO COME
13 ON STAFF WITH THE CHURCH?

14 A. YES.

15 Q. DID MR. MULL EVER TELL YOU WHAT WAS RELATED TO HIM
16 AS TO THE REASON THAT HE WAS ASKED TO COME ON STAFF?

17 A. HE WAS --

18 MR. KLEIN: I WOULD OBJECT AS TO HEARSAY, YOUR HONOR.

19 THE COURT: SUSTAINED.

20 Q. DID MR. MULL EVER TELL YOU WHAT MR. MULL'S BELIEF
21 WAS THAT THE REASON WAS THAT HE WAS ASKED TO COME TO CAMELOT?

22 A. TO DESIGN --

23 MR. KLEIN: I WOULD AGAIN OBJECT AS TO HEARSAY, YOUR
24 HONOR.

25 THE COURT: SUSTAINED.

26 Q. BY MR. LEVY: IN ALL OF YOUR DISCUSSIONS WITH
27 ELIZABETH AND THE BOARD OF DIRECTORS DO YOU KNOW WHETHER OR NOT
28 GREGORY MULL WAS ASKED TO COME TO CAMELOT TO DESIGN THE NEW

1 JERUSALEM?

2 A. YES.

3 Q. DO YOU REMEMBER WHO IT WAS WHO SAID THOSE WORDS TO
4 HIM?

5 A. MONROE SHEARER.

6 Q. DID YOU EVER HAVE ANY DISCUSSIONS WITH MR. MULL
7 ONCE HE CAME TO CAMELOT ABOUT SELLING HIS HOME IN SAN
8 FRANCISCO?

9 A. YES.

10 Q. CAN YOU TELL US WHAT YOUR DISCUSSION WITH MR. MULL
11 WAS.

12 MR. KLEIN: OBJECT. HEARSAY, YOUR HONOR.

13 MR. LEVY: A DISCUSSION BETWEEN THIS WITNESS AND MR.
14 MULL. SHE'S A PERCIPIENT WITNESS TO THE DISCUSSION.

15 THE COURT: ISN'T IT HEARSAY SO FAR AS THE CHURCH IS
16 CONCERNED?

17 MR. LEVY: I'M NOT ASKING WHAT THE CHURCH SAID. I'M
18 ASKING WHAT SHE SAID AND MR. MULL SAID.

19 THE COURT: WHO WAS PRESENT?

20 MR. LEVY: THIS LADY AND MR. MULL.

21 THE COURT: ISN'T THAT CONVERSATION HEARSAY AS TO THE
22 CHURCH? THAT'S THE REASON I'M SUSTAINING THE OBJECTION.

23 MR. LEVY: I'M ASKING.

24 THE COURT: AS BETWEEN --

25 MR. LEVY: I HEAR WHAT YOU'RE SAYING.

26 THE COURT: JUST STOP FOR A SECOND. I THINK IT'S
27 HEARSAY SO FAR AS THE CHURCH IS CONCERNED.

28 MR. LEVY: I'M NOT ASKING THE QUESTION ABOUT WHAT THE

1 CHURCH TOLD HIM.

2 THE COURT: I'M NOT MAKING MY POINT CLEAR.

3 MR. LEVY: YES, YOU ARE, YOUR HONOR. I WILL APPROACH IT
4 IN ANOTHER WAY. THANK YOU VERY MUCH.

5 Q. DID MR. MULL DISCUSS WITH YOU THE POSSIBILITY OF
6 SELLING HIS HOME IN SAN FRANCISCO?

7 A. YES.

8 Q. DID YOU GIVE HIM ANY ADVICE?

9 A. YES.

10 Q. WOULD YOU TELL US WHAT THE ADVICE WAS THAT YOU
11 GAVE TO HIM?

12 A. I TOLD HIM DON'T SELL IT. IF YOU SELL THE CHURCH
13 WILL WANT THE MONEY. IN FACT THEY WILL PROBABLY ENCOURAGE YOU
14 TO SELL IT AND GIVE THEM THE MONEY.

15 Q. DID YOU DISCUSS WITH GREGORY MULL ANY PERSONAL
16 COMPLAINTS OR CRITICISM THAT YOU HAD ABOUT YOUR LIFE AND YOUR
17 SERVICE AT THE CHURCH AROUND THIS TIME?

18 A. YES.

19 Q. WOULD YOU TELL US ESSENTIALLY WHAT IT WAS YOU
20 COMPLAINED TO GREGORY ABOUT.

21 A. I COMPLAINED TO GREGORY ABOUT THINGS I SAW --

22 (REPORTER CHANGES PAPER.)

23 MR. LEVY: WOULD THE COURT BE KIND ENOUGH TO HAVE THE
24 REPORTER READ BACK MY LAST QUESTION.

25 THE COURT: ALL RIGHT.

26 (QUESTION READ.)

27 Q. BY MR. LEVY: WOULD YOU COMPLETE YOUR STATEMENT
28 PLEASE.

1 A. YES.

2 THE THINGS THAT I WAS OBSERVING THAT WAS
3 HAPPENING. FOR EXAMPLE, I WAS ASKED TO PULL THE FILES OF THE
4 STAFF MEMBERS, ALL OF THE STAFF MEMBERS, AND TO GO THROUGH THE
5 FILES AND TO READ THE LETTERS THE STAFF MEMBERS HAD WRITTEN, TO
6 FIND THOSE LETTERS THAT CONTAINED EFFLUVIA, BEING SOME TYPE OF
7 ENERGY THAT MIGHT BE DIRECTED AGAINST MOTHER BECAUSE SHE FELT
8 LIKE ALL THIS ENERGY WAS POURING IN ON HER AND IT MUST BE
9 COMING FROM THESE LETTERS.

10 THIS BURDENED ME GREATLY BECAUSE I DIDN'T WANT TO
11 READ ALL THESE PEOPLE'S PRIVATE PERSONAL LETTERS WHICH SOME OF
12 THEM WERE LIKE LETTERS OF CONFESSION, THINGS THAT THEY HAD DONE
13 THEY WERE ASHAMED OF AND SO FORTH AND I WAS TO PULL OUT ALL OF
14 THOSE THAT LOOKED LIKE THEY HAD THAT TYPE OF ENERGY SO -- AND
15 MAKE PHOTOCOPIES OF THEM AND PUT THE PHOTOCOPIES BACK IN THE
16 FILE SO THAT THE ORIGINALS COULD BE BURNED. AND EACH NIGHT I
17 WOULD COME HOME AFTER READING THIS BECAUSE --

18 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. MAYBE A
19 QUESTION COULD BE ASKED.

20 THE COURT: IT'S TIME FOR ANOTHER QUESTION.

21 Q. BY MR. LEVY: AS A RESULT OF YOUR COMPLAINTS DID
22 ANYTHING HAPPEN?

23 A. YES. GREGORY SAID THAT HE WAS SO BURDENED BY THEM
24 THAT HE WAS GOING TO HAVE TO TALK TO MONROE ABOUT THEM.

25 Q. DID HE TALK TO MONROE ABOUT THEM?

26 A. YES.

27 Q. WOULD YOU TELL US WHAT HAPPENED THEREAFTER?

28 A. YES. MONROE REPORTED TO ELIZABETH AND I WAS

1 CALLED INTO ELIZABETH'S OFFICE AND ELIZABETH AND MONROE AND
2 GREGORY WERE THERE AND THEY HAD HAD GREGORY WRITE ON AN 8 1/2 X
3 11 PIECE OF PAPER A LIST OF ALL THE THINGS THAT I HAD TOLD HIM
4 THAT HAD BURDENED HIM SO AND THEY HAD GREGORY READ THAT PAPER
5 TO ME AND ELIZABETH ASKED ME IF EVERYTHING IN THAT LETTER WAS
6 TRUE.

7 Q. WAS IT TRUE?

8 A. ALMOST EVERYTHING.

9 Q. WHAT HAPPENED AS A RESULT OF THAT MEETING?

10 A. AS A RESULT OF THAT MEETING, I WAS REMOVED FROM
11 THE STAFF, ELIZABETH SAID I WOULD HAVE TO LEAVE RIGHT AWAY.

12 GREGORY SAID, NO, I DON'T WANT KATHLEEN TO GO, I
13 LOVE KATHLEEN.

14 SHE SAID SHE CAN'T STAY HERE AND BECAUSE ONE OF
15 THE THINGS THAT WAS IN THAT LETTER WAS THAT I DID NOT BELIEVE
16 SHE WAS A MESSENGER AND THAT'S A PRETTY SERIOUS CHARGE.

17 AND HE SAID, WELL, WHAT ABOUT THE CHILDREN?
18 BECAUSE MY CHILDREN WERE BOTH IN MONTESSORI SCHOOL AND SHE SAID
19 THE CHILDREN COULD STAY BUT SINCE I WOULDN'T BE WORKING TO PAY
20 THEIR WAY INTO MONTESSORI GREGORY WOULD HAVE TO PAY FOR IT.

21 SHE SAID I COULD LEAVE FOR A PERIOD OF SIX MONTHS
22 IF I WOULD SEEK PSYCHIATRIC HELP AND I WOULD GET A JOB IN THE
23 OUTSIDE WORLD FOR SIX MONTHS AND SUPPORT MYSELF I COULD THEN
24 WRITE A LETTER AND PETITION TO COME BACK ON STAFF.

25 Q. TALKING ABOUT PSYCHIATRIC HELP. WAS THERE A
26 PSYCHIATRIST AT CHURCH UNIVERSAL AND TRIUMPHANT?

27 A. YES. I DON'T KNOW IF IT WAS AT THIS TIME. IT
28 WAS THEN.

1 Q. THAT'S WHAT I MEAN. WHEN I SAY THIS TIME I'M
2 TALKING ABOUT THE TIME WE'RE TALKING ABOUT.

3 A. YES. DR. RALPH YANEY.

4 Q. DID YOU EVER HAVE OCCASION TO DO ANY WORK FOR
5 RALPH YANEY?

6 A. I DIDN'T WORK DIRECTLY FOR RALPH YANEY. I HAD
7 OCCASION TO SPEAK TO HIM ON THE PHONE.

8 Q. DID YOU EVER HAVE TO TYPE NOTES FOR RALPH YANEY AT
9 THAT TIME? YOU SAID YOU SPOKE TO HIM ON THE PHONE. WOULD YOU
10 TELL US WHAT THE OCCASION WAS.

11 MR. KLEIN: I'M GOING TO OBJECT AS TO THE RELEVANCY,
12 YOUR HONOR.

13 THE COURT: OVERRULED.

14 THE WITNESS: DR. YANEY HAD CALLED TO REPORT TO
15 ELIZABETH OR EDWARD -- AND I CAN'T REMEMBER WHICH -- ABOUT A
16 STAFF MEMBER WHO HAD COME TO SEE HIM TO TELL ABOUT HIS SESSION
17 WITH THE STAFF MEMBER AND I WAS ASKED TO PICK UP THE PHONE AND
18 TAKE NOTES.

19 Q. WAS DOCTOR --

20 A. -- ON WHAT YANEY WAS SAYING.

21 Q. WAS DR. YANEY GIVING THE PERSONAL INFORMATION THAT
22 HE HAD LEARNED FROM THAT PERSON IN A PRIVATE SESSION TO
23 SOMEBODY ON THE BOARD?

24 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO RELEVANCE
25 AND FOUNDATION FOR THAT QUESTION.

26 THE COURT: SUSTAINED AS TO FOUNDATION.

27 Q. BY MR. LEVY: AFTER THE MEETING WERE YOU ASKED TO
28 LEAVE THE CHURCH?

- 1 A. YES.
- 2 Q. DID YOU?
- 3 A. YES.
- 4 Q. DID YOU LEAVE THE NEXT MORNING?
- 5 A. YES.
- 6 Q. MR. MULL PUT YOU ON A BUS?
- 7 A. YES.
- 8 Q. DID YOUR CHILDREN GO WITH YOU?
- 9 A. NO. THEY WERE IN SCHOOL.
- 10 Q. WERE YOU GIVEN ANY MONEY WHEN YOU WERE PUT ON THE
- 11 BUS?
- 12 A. NO.
- 13 Q. DID YOU AND MR. MULL EVENTUALLY GET DIVORCED?
- 14 A. YES.
- 15 Q. DID YOU REMARRY?
- 16 A. YES.
- 17 Q. WHO DID YOU MARRY AFTER YOU DIVORCED MR. MULL?
- 18 A. EDGAR, E-D-G-A-R, H. IS THE MIDDLE INITIAL,
- 19 MUELLER, M-U-E-L-L-E-R.
- 20 Q. WAS HE ASSOCIATED WITH CHURCH UNIVERSAL AND
- 21 TRIUMPHANT AT THAT TIME?
- 22 A. YES.
- 23 Q. WERE YOU EXCOMMUNICATED FROM THE CHURCH?
- 24 A. YES.
- 25 Q. AS RESULT OF YOUR MARRIAGE TO MR. MUELLER WAS HE
- 26 SUSPENDED FROM THE CHURCH?
- 27 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO FOUNDATION
- 28 AND ASKING THE WITNESS FOR A CONCLUSION.

1 THE COURT: SUSTAINED.

2 Q. BY MR. LEVY: DID YOU PARTICIPATE IN THE
3 CONVERSATION AFTER YOU MARRIED MR. MUELLER WITH A
4 REPRESENTATIVE OF THE CHURCH WHEREBY THE TERMS WERE SET FORTH
5 WITH REGARD TO WHAT IT WOULD REQUIRE FOR MR. MUELLER TO
6 MAINTAIN HIS MEMBERSHIP IN THE CHURCH?

7 A. YES.

8 Q. WOULD YOU TELL US WHAT HAPPENED IN THAT
9 CONVERSATION.

10 A. YES. WE WERE CONTACTED BY MONROE SHEARER WHEN THE
11 CHURCH LEARNED WE HAD BEEN MARRIED AND MONROE SHEARER AND PEGGY
12 KEITHLY CAME TO MEET WITH US AND MONROE SHEARER SAID THAT AS A
13 RESULT OF THE MARRIAGE WHICH WAS DONE WITHOUT ELIZABETH'S
14 PERMISSION WE -- I WAS EXCOMMUNICATED AND EDGAR WAS SUSPENDED.
15 HOWEVER, IF EDGAR WOULD LEAVE ME HE COULD BE BACK IN THE
16 CHURCH. AND PEGGY KEITHLY WHO HAD BEEN IN A BUSINESS
17 PARTNERSHIP WITH EDGAR ALSO TOLD HIM HE WAS OUT OF THE
18 PARTNERSHIP BUT IF HE WOULD LEAVE ME HE WAS BACK INTO THE
19 PARTNERSHIP. THEY SAID THIS IN FRONT OF ME SO I'M --

20 MR. LEVY: I HAVE NOTHING FURTHER ON DIRECT OF THIS
21 WITNESS, YOUR HONOR.

22 THE COURT: WE WILL TAKE OUR RECESS AT THIS TIME.

23 (RECESS.)

24 THE COURT: I MIGHT MENTION, LADIES AND GENTLEMEN, THAT
25 WHILE INDEED EACH AND ALL OF THE PARTIES TO THIS LAWSUIT ARE
26 WELCOMED TO BE HERE THROUGHOUT THE TRIAL AND INDEED EACH OF
27 THEM HAS A LEGAL RIGHT TO BE HERE THROUGHOUT THE TRIAL AS YOU
28 WOULD EXPECT IS THE CASE IT IS A FACT THAT NONE OF THEM IS

1 REQUIRED TO BE HERE AT ANY PARTICULAR TIME. SO IT MAY BE --
2 AND I JUST WANTED TO MENTION THIS TO YOU -- IT MAY BE THAT FROM
3 TIME TO TIME SOME OF THE PARTIES TO THIS LAWSUIT MAY BE
4 PRESENT OR NOT PRESENT AND SOMETIMES THEY'LL HAVE OTHER THINGS
5 TO DO AND THERE WILL BE VARIOUS REASONS WHY THEY MAY OR MAY NOT
6 BE HERE, ALL OF WHICH SHOULD LEAD YOU TO DRAW NO PARTICULAR
7 CONCLUSIONS.

8 PLEASE PROCEED.

9 MR. KLEIN: THANK YOU, YOUR HONOR.

10
11 CROSS-EXAMINATION +

12
13 BY MR. KLEIN:

14 Q. DID YOU IN ABOUT MAY OF 1979 COMMUNICATE TO
15 ELIZABETH CLARE PROPHET BY LETTER THAT YOU BELIEVED THAT
16 GREGORY MULL HAD A SUBCONSCIOUS MOMENTUM OF PLAYING ONE PERSON
17 AGAINST ANOTHER?

18 A. I MAY HAVE.

19 Q. DO YOU REMEMBER WRITING A LETTER AND TELLING
20 ELIZABETH THAT?

21 A. NO.

22 Q. DO YOU REMEMBER WRITING A LETTER TO ELIZABETH IN
23 MAY OF 1979 TELLING HER THAT GREGORY MULL NOT ONLY HAD THIS
24 SUBCONSCIOUS MOMENTUM OF PLAYING ONE PERSON AGAINST ANOTHER BUT
25 SEWING SEEDS OF DISCORD BECAUSE HE HAD NOT RESOLVED HIS HATRED
26 OF HIS MOTHER? DO YOU REMEMBER WRITING A LETTER AND TELLING
27 THAT TO ELIZABETH?

28 A. I REMEMBER WRITING A LETTER LIKE THAT. WHAT I HAD

1 FORGOTTEN IS THAT I HAD MAILED IT.

2 MR. KLEIN: IS OUR NEXT NUMBER A HUNDRED AND FOUR OR A
3 HUNDRED AND FIVE?

4 THE CLERK: -5.

5 MR. KLEIN: I WOULD ASK THIS DOCUMENT LETTER DATED MAY
6 28, 1979 BE MARKED 105 FOR IDENTIFICATION, YOUR HONOR.

7 THE COURT: SO MARKED FOR IDENTIFICATION.

8 THE WITNESS: YES, I WROTE THIS LETTER.

9 Q. BY MR. KLEIN: THERE IS SOME --

10 MR. LEVY: EXCUSE ME, YOUR HONOR. AT THIS TIME I WILL
11 OBJECT TO THE INTRODUCTION OF THIS LETTER. IT CONTAINS
12 MULTIPLE HEARSAY.

13 THE COURT: I DON'T THINK IT'S BEEN OFFERED.

14 MR. LEVY: EXCUSE ME. PARDON ME, YOUR HONOR.

15 THE COURT: IT HAS BEEN MARKED FOR IDENTIFICATION.

16 MR. LEVY: I ANTICIPATE IT BEING OFFERED.

17 THE COURT: AND I ANTICIPATE YOU WILL HAVE SOME THINGS
18 TO SAY AND I ANTICIPATE I'LL LISTEN.

19 MR. LEVY: EXCUSE ME. MY PRESUMPTUOUSNESS.

20 Q. BY MR. KLEIN: THERE IS SOME HANDWRITING ON THE
21 SECOND PAGE OF THAT LETTER. IS THAT YOUR HANDWRITING, SOME ON
22 THE TOP AND SOME ON THE BOTTOM?

23 A. THAT'S CORRECT. THAT IS MY HANDWRITING.

24 Q. HAVING READ WHAT WAS MARKED A HUNDRED AND FIVE FOR
25 IDENTIFICATION DOES THAT REFRESH YOUR RECOLLECTION AS TO
26 WHETHER YOU WROTE TO ELIZABETH IN MAY OF 1979 TELLING HER THAT
27 YOUR -- THAT GREGORY HAS A SUBCONSCIOUS MOMENTUM FOR PLAYING
28 ONE PERSON AGAINST ANOTHER?

1 A. YES.

2 Q. DID YOU MEAN BY THAT PLAYING YOU AGAINST ELIZABETH
3 AND ELIZABETH AGAINST YOU?

4 A. I DON'T KNOW WHAT I MEANT.

5 Q. YOU SAID THAT HE ALSO -- YOU REFERRED TO HIM AS
6 SEWING SEEDS OF DISCORD. DO YOU REMEMBER WHAT YOU MEANT BY
7 THAT?

8 A. YES. I BLAMED GREGORY AT THE TIME THAT I WROTE
9 THIS LETTER AND I BELIEVE THAT THIS LETTER WAS PROBABLY WRITTEN
10 IN -- WITH A GREAT DEAL OF ANGER DIRECTED AGAINST HIM BECAUSE I
11 FELT I HAD BEEN BETRAYED WHEN HE WENT TO THE CHURCH AND TOLD
12 THEM EVERYTHING THAT I HAD BEEN TELLING HIM AS A WIFE TO A
13 HUSBAND.

14 Q. MY QUESTION IS, YOU SAID SEWING SEEDS OF DISCORD.
15 WHAT WERE YOU REFERRING TO? DO YOU REMEMBER SPECIFICALLY WHAT
16 THOSE WORDS MEANT WHEN YOU WROTE THEM?

17 A. NO, I DON'T REMEMBER WHAT I MEANT AT THE TIME. I
18 CAN ONLY CONJECTURE.

19 Q. I DON'T WANT YOU TO DO THAT. YOU SAID THAT HE HAD
20 NOT RESOLVED HIS HATRED OF HIS MOTHER. IS THAT SOMETHING
21 THAT --

22 WITHDRAW.

23 DID YOU BELIEVE THAT TO BE TRUE AT THE TIME YOU
24 WROTE THE LETTER?

25 MR. LEVY: I'M GOING TO OBJECT TO THIS, YOUR HONOR.
26 RELEVANCE.

27 THE COURT: SUSTAINED.

28 Q. BY MR. KLEIN: DID GREGORY CONSIDER ELIZABETH

1 CLARE PROPHET TO BE THE MOTHER?

2 A. YES.

3 Q. AT THE TIME YOU WROTE YOUR LETTER DID YOU BELIEVE
4 THAT GREGORY HAD NOT RESOLVED HIS HATRED OF HIS MOTHER?

5 MR. LEVY: I'M GOING TO OBJECT TO THAT, YOUR HONOR.
6 IT'S AMBIGUOUS IN THAT I THINK MR. KLEIN IS TRYING TO MAKE THIS
7 WITNESS'S WRITING AT THAT TIME REFER TO SOMETHING THAT SHE'S
8 ALREADY TESTIFIED TO THAT SHE'S NOT SURE EXACTLY WHAT IT DID
9 REFER TO. MR. KLEIN IS TRYING TO MAKE IT REFER TO --

10 THE COURT: PLEASE REPHRASE YOUR QUESTION.

11 Q. BY MR. KLEIN: WHEN YOU WROTE TO ELIZABETH THAT
12 GREGORY HAD NOT RESOLVED HIS HATRED OF HIS MOTHER DID YOU HAVE
13 IN YOUR MIND ANY --

14 I WILL WITHDRAW THAT.

15 A. I KNOW THE ANSWER NOW.

16 MR. LEVY: YOU HAVE TO WAIT FOR HIM TO ASK QUESTIONS.

17 THE WITNESS: OKAY.

18 Q. BY MR. KLEIN: BASED ON YOUR KNOWLEDGE OF GREGORY
19 MULL DID YOU BELIEVE IN MAY OF 1979 THAT HE HAD NOT RESOLVED
20 HIS HATRED OF HIS MOTHER?

21 MR. LEVY: AGAIN, YOUR HONOR, I'M GOING TO OBJECT.
22 RELEVANCE.

23 THE COURT: SUSTAINED.

24 Q. BY MR. KLEIN: MAYBE YOU COULD DIRECT YOUR
25 ATTENTION TO THE SECOND PAGE, THE NEXT TO THE LAST PARAGRAPH.

26 (WITNESS READING.)

27 DO YOU RECALL SPEAKING IN THAT LETTER ABOUT
28 ELIZABETH HELPING GREGORY OVERCOME OLD MOMENTUMS?

1 A. YES.

2 Q. DO YOU REMEMBER WHAT THE OLD MOMENTUMS WERE THAT
3 YOU WANTED ELIZABETH TO HELP HIM OVERCOME?

4 A. I WOULD HAVE LIKED FOR HIM TO BE TRUE TO ONE
5 WOMAN.

6 Q. IS THAT SOMETHING THAT HE HAD NOT BEEN TRUE IN THE
7 PAST TO ONE WOMAN?

8 A. HE NOT BEEN TRUE TO ME.

9 Q. PRIOR TO THE INCIDENT OF CAMELOT IN 1979 HAD THERE
10 BEEN OTHER OCCASIONS BEFORE THAT WHERE HE NOT BEEN TRUE TO YOU?

11 A. YES, I FELT THERE WERE.

12 Q. WERE THERE OCCASIONS BEFORE HE WAS EVER A CHURCH
13 MEMBER WHERE YOU FELT HE WAS NOT TRUE TO YOU?

14 A. YES. EVEN AFTER HE WAS A CHURCH MEMBER.

15 Q. BEFORE AND AFTER?

16 A. YES.

17 Q. DID YOU ALSO WRITE TO ELIZABETH CLARE PROPHET IN
18 THAT LETTER THAT THESE MOMENTUMS WOULD LIE BENEATH THE SURFACE
19 UNTIL SOMEONE ELSE TRIGGERS AN EXPLOSION? DO YOU REMEMBER
20 WRITING ANYTHING LIKE THAT?

21 A. YES. I BELIEVE I KNOW WHAT I WAS TRYING TO CONVEY
22 TO HER?

23 Q. THAT'S MY QUESTION. WHAT WERE YOU CONVEYING WHEN
24 YOU TALKED ABOUT SOMEONE ELSE TRIGGERING AN EXPLOSION?

25 A. ALL RIGHT. WHAT I WAS CONVEYING TO HER WAS THAT
26 GREGORY HAD TURNED A LOT OF ENERGY AGAINST ME AT THE TIME THAT
27 I LEFT THE CHURCH. HE BELIEVED THAT MY HEART WAS TOTALLY BLACK
28 AND THAT I WAS A TOTALLY DARK PERSON, VERY SINISTER AND SO

1 FORTH. HE HAD BEEN CONVINCED BY THE CHURCH THAT THAT WAS THE
2 CASE AND THAT HE SHOULD DIVORCE ME BECAUSE ASCENDANT MASTER
3 SAID. ELMORYA SAID HE NOW COULD DIVORCE ME. SO I THOUGHT WELL
4 NOW GREGORY IS ACCEPTING THAT RIGHT NOW AND HE'S DOWN ON ME NOW
5 AND AT SOME FUTURE TIME HE MAY BE DOWN ON ELIZABETH, AND THAT'S
6 WHAT I WAS TELLING HER.

7 Q. THAT THERE MIGHT BE AN EXPLOSION IF HE WERE DOWN
8 ON HER?

9 A. YES.

10 Q. AM I CORRECT THAT ELMORYA SAID THAT HE COULD
11 DIVORCE YOU AS OPPOSED TO SHOULD DIVORCE YOU.

12 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR, CALLS FOR
13 CONCLUSION ON THE PART OF THIS WITNESS. IT HAS NOT BEEN
14 ESTABLISHED THAT WHETHER OR NOT WHEN ELMORYA TALKS THIS LADY
15 HEARS HIM.

16 THE COURT: SUSTAINED.

17 Q. BY MR. KLEIN: DO YOU BELIEVE THAT WHEN YOU WERE
18 AT CAMELOT YOU TOO HAD SOME KIND OF A LOVE HATE RELATIONSHIP
19 WITH ELIZABETH CLARE PROPHET?

20 A. YES, VERY DEFINITELY.

21 Q. DIFFERENT TIMES ONE OR THE OTHER MIGHT PREVAIL,
22 THE LOVE OR THE HATE?

23 A. YES, AND EVEN IN BETWEEN.

24 Q. AND EVEN IN BETWEEN?

25 A. RIGHT.

26 Q. AFTER YOU HAD LEFT THE CHURCH ISN'T IT TRUE THAT
27 YOU WANTED TO RETURN?

28 A. NO.

1 Q. DID YOU HAVE ANY DESIRE TO RETURN TO THE CHURCH
2 AFTER YOU LEFT, AFTER THAT MEETING THAT YOU TALKED ABOUT?

3 A. AFTER WHAT MEETING?

4 Q. THE ONE WERE YOU WERE PRESENT AND ELIZABETH AND
5 GREGORY MULL AND THEN THE NEXT DAY YOU TOOK THE BUS AND LEFT.
6 AFTER THAT SITUATION WHEN YOU TOOK THE BUS AND LEFT DID YOU
7 HAVE ANY DESIRE TO COME BACK INTO THE CAMELOT?

8 A. I VACILATED. SOMETIMES I DID AND SOMETIMES I
9 DIDN'T. AND I WAS EXTREMELY IN A VERY BIG STATE OF CONFUSION
10 AT THE TIME I LEFT BECAUSE WHILE ONE OF THE THINGS I WAS
11 DISMISSED FOR WAS SAYING THAT I DID NOT BELIEVE THAT ELIZABETH
12 WAS A MESSENGER AT THE SAME TIME I WAS VERY CONFUSED ABOUT THE
13 CHURCH AND AFTER I LEFT I WOULD HAVE DREAMS SOMETIMES, YOU
14 KNOW, AND THOSE WOULD BE VACILATING ALSO.

15 I WOULD HAVE EXTREME FEELINGS OF LOVE FOR
16 ELIZABETH. I HAVE OTHER TIMES WHEN I THOUGHT SHE WAS JUST MY
17 FRIEND AND OTHER TIMES WHEN I JUST SO WISHED THAT SHE DIDN'T
18 TREAT PEOPLE THE WAY SHE DID AND I WOULD TRY AND FIGURE OUT WHY.
19 SHE DID IT, WHETHER IT WAS A TREMENDOUS RESPONSIBILITY THAT SHE
20 HAD OR WHETHER IT WAS THAT SHE JUST PLAIN DIDN'T CARE ABOUT
21 THEM. AND I WAS REALLY TRYING TO BE VERY ANALYTICAL AND FIGURE
22 THE WHOLE THING OUT.

23 THIS LETTER THAT YOU SEE HERE IS ONE OF PROBABLY
24 TEN THAT I WROTE. I WROTE THEM AND TORE THEM UP AND WROTE THEM
25 AND TORE THEM UP, WROTE THEM AND TORE THEM UP.

26 Q. WAS IT TRUE THAT GREGORY MULL TOLD YOU AFTER THAT
27 MEETING THAT YOU HAD ATTENDED THAT YOU DESCRIBED WITH ELIZABETH
28 AND GREGORY MULL THAT SOMETIME AFTER THAT MEETING HE TOLD YOU

1 THAT HE WOULD FILE FOR DIVORCE IF YOU DID NOT WRITE A LETTER TO
2 ELIZABETH CLARE PROPHET TELLING ELIZABETH THAT SHE -- THAT
3 GREGORY WAS NOT A CRITICAL PERSON? THAT GETS A LITTLE
4 COMPLICATED. YOU WANT ME TO SAY IT AGAIN I WILL?

5 A. IT DOESN'T MATTER. I DON'T REMEMBER UNDER WHAT
6 CIRCUMSTANCES HE SAID HE WAS GOING TO GET A DIVORCE. I JUST
7 REMEMBER THAT ELMORYA SAID, YOU KNOW, KATHLEEN IS NO GOOD
8 DIVORCE HER AND HE JUST ANNOUNCED TO ME HE WAS FILING FOR A
9 DIVORCE. I DON'T REMEMBER ANYTHING ELSE BEING SAID.

10 Q. DO YOU REMEMBER WRITING A LETTER TO ELIZABETH,
11 ANOTHER LETTER, NOT THE LETTER YOU HAVE THERE, TELLING HER I
12 SUPPOSE GREGORY IS PLANNING TO FILE A DIVORCE SINCE I HAVE NOT
13 WRITTEN TO YOU THAT HE IS NOT A CRITICAL PERSON. HOWEVER TO DO
14 SO WOULD HAVE BEEN A BETRAYAL OF HIS SOUL. DO YOU REMEMBER
15 WRITING THAT?

16 A. I REMEMBER THOSE WORDS.

17 Q. WHAT HAPPENED THAT GREGORY MULL HAD TOLD YOU THAT
18 HE WAS GOING TO DIVORCE YOU UNLESS YOU WROTE TO ELIZABETH A
19 LETTER AND SAID IN THAT LETTER GREGORY MULL IS NOT A CRITICAL
20 PERSON? ISN'T THAT WHAT HAPPENED?

21 A. VERY POSSIBLE.

22 Q. AND AM I CORRECT THAT YOU REFUSED TO WRITE SUCH A
23 LETTER?

24 A. YES. I WOULDN'T WRITE SUCH A LETTER.

25 Q. BUT YOU KNEW THAT BY NOT WRITING SUCH A LETTER
26 GREGORY MULL HAD STATED TO YOU THAT HE WOULD DIVORCE YOU; IS
27 THAT CORRECT?

28 A. YES. IF THAT'S WHAT I PUT IN THE LETTER.

1 Q. IS THERE ANY QUESTION IN YOUR MIND AS TO WHETHER
2 YOU SAID THAT IN THE LETTER?

3 A. NO. BECAUSE THE WORDS YOU READ SOUNDS EXACTLY
4 LIKE WHAT I WOULD SAY.

5 MR. KLEIN: YOUR HONOR, WOULD ASK THIS LETTER DATED MAY
6 21, 1979 BE MARKED^ NUMBER 106 FOR IDENTIFICATION.

7 THE COURT: SO MARKED.

8 Q. BY MR. KLEIN: I WOULD DIRECT YOUR ATTENTION TO
9 PAGE 4 OF THAT LETTER AND YOU CAN JUST READ THAT SECOND
10 PARAGRAPH. AT THIS POINT THE ONLY QUESTION I'M GOING TO ASK
11 YOU IS GOING TO REFER TO THAT.

12 (WITNESS READING.)

13 AND ALSO WHEN YOU'RE DONE WITH THAT YOU CAN TURN
14 TO PAGE 5, THE FOURTH PARAGRAPH. THAT'S THE OTHER ONE I'M
15 GOING TO ASK YOU SOMETHING ABOUT.

16 A. THERE IS ONLY -- OH, PAGE 5, THE FOURTH PARAGRAPH.
17 WAIT. I HAD THE WRONG --

18 (WITNESS READING.)

19 Q. HAVING READ THOSE PARAGRAPHS ON EXHIBIT 106 FOR
20 IDENTIFICATION DOES THAT REFRESH YOUR RECOLLECTION THAT YOU DID
21 IN FACT MAKE THOSE STATEMENTS?

22 A. WHAT STATEMENTS WERE THOSE?

23 Q. THE ONE ABOUT GREGORY PLANNING TO FILE A DIVORCE
24 BECAUSE YOU HAD NOT WRITTEN TO ELIZABETH THAT GREGORY IS NOT A
25 CRITICAL PERSON AND YOU DIDN'T DO IT BECAUSE IT WOULD BE A
26 BETRAYAL OF HIS SOUL?

27 A. THAT'S CORRECT. THAT'S WHAT'S IN HERE AND I DID
28 WRITE THIS.

1 Q. DID YOU TELL ELIZABETH CLARE PROPHET THAT GREGORY
2 WANTED TO BE A PERMANENT STAFF MEMBER, THAT HE SAID THAT HE
3 NEVER WANTS TO LEAVE CAMELOT?

4 A. I MAY HAVE. BECAUSE HE DID SAY THAT.

5 Q. WHEN DID HE TELL YOU THAT?

6 A. BEFORE I LEFT.

7 Q. I WOULD DIRECT YOUR ATTENTION AGAIN TO PAGE 5, THE
8 BEGINNING OF THE LAST PARAGRAPH.

9 (WITNESS READING.)

10 HAVING READ THAT SECTION OF EXHIBIT 106 FOR
11 IDENTIFICATION DOES THAT REFRESH YOUR RECOLLECTION AS TO
12 WHETHER YOU TOLD ELIZABETH THAT GREGORY WANTS TO BE ON
13 PERMANENT STAFF AND HE NEVER WANTS TO LEAVE CAMELOT?

14 A. YES.

15 Q. YOU DID SAY THAT?

16 A. YES. NEVER DENIED IT.

17 Q. NOW, WHEN YOU MET WITH GREGORY MULL, ELIZABETH
18 CLARE PROPHET, MONROE SHEARER ON THE DAY BEFORE YOU LEFT
19 CAMELOT AT THAT MEETING WERE SOME OF THE THINGS THAT GREGORY
20 SAID ABOUT YOU UNTRUE?

21 A. WHAT GREGORY SAID WAS HE JUST READ A LIST OF
22 THINGS THAT I HAD SAID TO HIM AND THE ONE THING THAT HE SAID,
23 YES, THAT I DID NOT SAY IS HE SAID THAT I SAID THAT IT WAS LIKE
24 A NAZI CONCENTRATION CAMP. I BELIEVE HE HAD RELATED TO ME THAT
25 SOMEBODY ELSE HAD TOLD HIM THAT, ANOTHER STAFF MEMBER HAD TOLD
26 HIM THEY FELT THAT WAY SO THAT WAS THE ONLY THING IN THAT
27 LETTER, HOWEVER, OR IN THAT LIST OF THINGS THAT HE SAID THAT I
28 HAD NOT SAID.

1 Q. DO YOU RECALL WRITING TO ELIZABETH CLARE PROPHET
2 THAT THE CHARGES GREGORY LEVELED HAD INTERLACED TRUTH WITH
3 ERROR?

4 A. YES. THAT WAS THE ERROR I WAS REFERRING TO.

5 Q. IS IT --

6 WITHDRAW.

7 WAS IT TRUE THAT WHILE YOU LIVED AT CAMELOT YOU
8 HAD TROUBLE SLEEPING AT NIGHT BECAUSE GREGORY WOULD SPEND THE
9 NIGHT HOURS MAKING OBSERVATIONS OF YOUR FAULTS AND PICKING AND
10 NAGGING YOU ABOUT IT?

11 A. YES, HE PICKED AND NAGGED ME A LOT, AND I FOUND IT
12 DIFFICULT TO SLEEP WITH ALL OF THIS ON MY MIND. I WAS GETTING
13 VERY LITTLE SLEEP ANYWAY BUT ON TOP OF IT ALL HE WAS VERY
14 DISTURBED BECAUSE I WAS BEING AWAKENED IN THE MIDDLE OF THE
15 NIGHT TO GO DOWNSTAIRS AND GET FILES AND LIKE ONE NIGHT I THINK
16 IT HAPPENED ABOUT FOUR TIMES I WOULD NO SOONER GET UNDRESSED
17 GET INTO BED, MONROE SHEARER WOULD BE ON THE PHONE DOWNSTAIRS,
18 I WAS UP ON THE THIRD FLOOR, I WOULD HAVE TO HOP INTO SOMETHING
19 RUN DOWN THERE. THIS WENT ON SO MANY TIMES GREGORY GOT VERY
20 UPSET BECAUSE IT WAS DISTURBING HIS SLEEP.

21 Q. DID YOU EVER WRITE TO ELIZABETH CLARE PROPHET
22 THERE WAS NO RELIEF FROM THE PRESSURE BECAUSE I WAS GREETED
23 NIGHTLY WITH A LIST OF GREGORY'S OBSERVATION OF MY FAULTS AND
24 SPENT MANY NIGHTS WITH LITTLE SLEEP DUE TO HIS PICKING AND
25 NAGGING WHICH AMPLIFIED THE GUILT?

26 A. THAT'S TRUE. I GOT IT ON BOTH ENDS.

27 MR. KLEIN: I WOULD ASK THAT EXHIBIT 106 FOR
28 IDENTIFICATION BE RECEIVED IN EVIDENCE.

1 MR. LEVY: YOUR HONOR, I'M GOING TO OBJECT TO IT BEING
2 RECEIVED IN EVIDENCE SINCE IT CONTAINS SO MUCH HEARSAY ON
3 HEARSAY AND STATEMENTS THAT OTHER PEOPLE SAID TO OTHER PEOPLE.

4 THE COURT: SUSTAINED.

5 MR. KLEIN: I WOULD ASK THAT EXHIBIT 105 BE RECEIVED
6 INTO EVIDENCE.

7 MR. LEVY: SAME OBJECTION, YOUR HONOR.

8 THE COURT: SUSTAINED.

9 Q. BY MR. KLEIN: WHEN YOU LEFT CAMELOT DID YOU FEEL
10 THAT THINGS WERE LEFT UNCLEAR OR WERE UNRESOLVED BETWEEN YOU
11 AND ELIZABETH? '

12 MR. LEVY: I WOULD OBJECT, YOUR HONOR. VAGUE AND
13 AMBIGUOUS.

14 THE COURT: SUSTAINED.

15 Q. BY MR. KLEIN: WHEN YOU LEFT CAMELOT DID YOU EVER
16 RECEIVE A LETTER FROM ELIZABETH CLARE PROPHET WHICH SHE TOLD
17 YOU PLEASE FEEL FREE TO CALL ME OR COMMUNICATE WITH ME BY
18 LETTER IF ANYTHING IS UNCLEAR OR UNRESOLVED?

19 A. I DON'T REMEMBER RECEIVING A LETTER BUT I PROBABLY
20 DID BECAUSE THAT WAS SEVEN YEARS AGO AND I'M FINDING THAT MY
21 MEMORY DOESN'T SERVE ME AS WELL AS IT SHOULD. BUT I WOULD SAY
22 THAT WOULD BE SOMETHING SHE WOULD DO, YES.

23 Q. DO YOU RECALL RECEIVING SUCH A LETTER?

24 A. NO.

25 Q. WHEN YOU LEFT CAMELOT DID YOU RECEIVE A LETTER
26 FROM ELIZABETH CLARE PROPHET TELLING YOU THAT SHE FELT YOU HAD
27 A CERTAIN LOVE HATE DICHOTOMY THAT YOU HAD TO RESOLVE?

28 A. THAT LETTER I REMEMBER.

1 Q. AND THAT IT WOULD BE A NEGATIVE EXPERIENCE FOR YOU
2 TO BE AT CAMELOT UNTIL YOU RESOLVED THAT? DO YOU REMEMBER HER
3 TELLING YOU THAT?

4 A. YES.

5 Q. DO YOU REMEMBER HER ALSO TELLING YOU IN A LETTER
6 AFTER YOU LEFT THAT SHE LOVED YOU VERY MUCH AND SHE WAS
7 GRATEFUL FOR THE FINE SERVICE THAT YOU GAVE TO HER WHILE YOU
8 WERE THERE?

9 A. YES.

10 Q. DO YOU RECALL HER WRITING YOU A LETTER ENCOURAGING
11 YOU TO GO TO SOME KIND OF THERAPY WHEREVER YOU WERE LIVING TO
12 TRY TO RESOLVE THE CONFLICTS THAT YOU HAD?

13 MR. LEVY: I'M GOING TO OBJECT TO THIS LINE OF
14 QUESTIONING, YOUR HONOR. I DON'T SEE THE RELEVANCE.

15 THE COURT: WHAT?

16 MR. LEVY: RELEVANCE.

17 THE COURT: SUSTAINED.

18 Q. BY MR. KLEIN: WERE YOU AWARE WHILE YOU WERE IN
19 CAMELOT THAT GREGORY MULL HAD AT ONE TIME BEEN A HOMOSEXUAL?

20 MR. LEVY: I'M GOING TO OBJECT TO THAT ALSO, YOUR HONOR.
21 RELEVANCE.

22 THE COURT: SUSTAINED.

23 MR. KLEIN: YOUR HONOR, I HAVE SOME OTHER QUESTIONS ON
24 THAT. I WOULD ASK TO BE HEARD AS TO THE RELEVANCE.

25 THE COURT: ALL RIGHT.

26 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE BENCH.)

27 THE COURT: WHAT IS THE RELEVANCE OF THIS? THIS IS A
28 CASE BETWEEN MULL AND THE CHURCH AND A COUPLE OF ITS LEADERS.

1 NOW WHAT'S THE RELEVANCE OF THIS EXCEPT TO KEEP TALKING ABOUT
2 IT IN FRONT OF THE JURY?

3 MR. KLEIN: THE RELEVANCE IS, YOUR HONOR, MY
4 UNDERSTANDING IS THEY'RE CLAIMING THAT -- ELIZABETH CLARE
5 PROPHET PEOPLE THAT HE WAS A HOMOSEXUAL AND THAT'S HOW THEY
6 KNEW. TO THE EXTENT THAT SHE TOLD PEOPLE THAT HE WAS
7 HOMOSEXUAL THEN THAT'S HOW PEOPLE COULD HAVE KNOWN AND THAT'S
8 WHAT I INTEND TO ASK HER ABOUT. IF THEY'RE NOT MAKING --

9 THE COURT: THE PROBLEMS I SEE IS THIS. IF MRS. PROPHET
10 DID TELL HER THEN WHAT?

11 MR. KLEIN: NO. NO. I'M SAYING IF MRS. MULL TOLD OTHER
12 PEOPLE THAT GREGORY MULL WAS A HOMOSEXUAL THEN THAT'S HOW
13 ANYBODY WHO KNEW IT COULD HAVE KNOWN IT. IT DOESN'T -- THEN IT
14 DIDN'T HAVE TO COME FROM MRS. PROPHET WHICH IS I UNDERSTAND
15 WHAT THEY'RE SAYING.

16 MR. LEVY: WE ALREADY HAVE TESTIMONY THAT IT CAME AT A
17 BOARD MEETING AND WAS DISSEMINATED BY THE CHURCH.

18 THE COURT: YOU WANT TO ASK HER IF SHE TOLD ANYBODY?

19 MR. KLEIN: YES TO THE EXTENT SHE DID TELL PEOPLE IT
20 CERTAINLY WASN'T CONFIDENTIAL THAT ELIZABETH CLARE PROPHET IS
21 THE ONLY PERSON WHO KNOWS ABOUT IT.

22 THE COURT: THIS WAS THE GAL HE MARRIED. THERE IS QUITE
23 A DIFFERENCE BETWEEN THIS WOMAN KNOWING ABOUT IT AND OTHERS WHO
24 WERE STRANGERS TO MR. MULL BEING TOLD ABOUT IT. THERE IS A
25 HECK OF A DIFFERENCE.

26 MR. KLEIN: WHAT I'M SAYING IS SHE TOLD OTHER PEOPLE WHO
27 WERE STRANGERS TO MULL THAT MULL WAS A HOMOSEXUAL THEN THAT
28 CERTAINLY IS RELEVANT.

1 THE COURT: YOU CAN ASK THAT QUESTION.

2 MR. KLEIN: THAT'S WHAT I WANT TO ASK.

3 THE COURT: THAT ISN'T THE QUESTION YOU ASKED BEFORE.

4 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN
5 COURT IN THE PRESENCE OF THE JURY:)

6 THE COURT: GO AHEAD.

7 Q. BY MR. KLEIN: DID YOU AT ANY TIME HAVE
8 CONVERSATIONS WITH ANY PEOPLE ASSOCIATED WITH THE CHURCH DURING
9 WHICH YOU DISCUSSED WITH THEM THE FACT THAT MR. MULL HAD BEEN
10 HOMOSEXUAL?

11 A. YES. I HAD A CONVERSATION WITH ENIECE BOOTH.

12 Q. WAS SHE A CHURCH MEMBER AT THE TIME?

13 A. SHE WAS A MINISTER AT THE TIME.

14 Q. DID YOU HAVE ANY CONVERSATIONS WITH ANY OTHER
15 PEOPLE CONNECTED WITH THE CHURCH ABOUT MR. MULL HAVING BEEN A
16 HOMOSEXUAL?

17 A. NO.

18 Q. DID YOU HAVE A CONVERSATION WITH PAULA ZARSICKI?

19 A. NO.

20 Q. DID YOU HAVE A CONVERSATION WITH NANCY JOHNSON
21 ABOUT IT?

22 A. NO.

23 Q. DID YOU HAVE A CONVERSATION WITH PEGGY KEITHLY
24 ABOUT IT?

25 A. NO. I DIDN'T TALK TO ANYONE BUT ENIECE BOOTH.

26 Q. WHEN YOU FINISHED AT SUMMIT UNIVERSITY DID YOU
27 FEAR PEOPLE WHO WERE NOT CHURCH MEMBERS?

28 MR. LEVY: OBJECTION, YOUR HONOR. RELEVANCE.

1 THE COURT: WHAT'S THE QUESTION?

2 MR. KLEIN: WHEN YOU FINISHED YOUR COURSE AT SUMMIT
3 UNIVERSITY DID YOU HAVE ANY FEAR TO BE AMONG PEOPLE WHO WERE
4 NOT CHURCH MEMBERS?

5 THE COURT: WAIT A MINUTE.

6 MR. LEVY: RELEVANCE.

7 THE COURT: SUSTAINED.

8 Q. BY MR. KLEIN: WHEN YOU FINISHED AT SUMMIT
9 UNIVERSITY DID YOU FEEL ALIENATED FROM THE REST OF THE WORLD?

10 MR. LEVY: SAME OBJECTION, YOUR HONOR.

11 THE COURT: SUSTAINED.

12 MR. KLEIN: YOUR HONOR --

13 THE COURT: PLEASE PROCEED. APPROACH THE BENCH FOR A
14 MINUTE.

15 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE BENCH:)

16 THE COURT: I'M GOING TO TELL YOU SOMETHING ONCE AND I
17 WILL NOT TELL YOU AGAIN. WHEN I MAKE A RULING YOU STOP ROLLING
18 YOUR EYES AND MAKING FACES. NOW THE REASON IS HOW SHE FELT IS
19 IRRELEVANT. THE FACT THAT ONE OR SEVERAL PEOPLE MIGHT HAVE
20 REACTED ONE WAY OR COME OUT OF THE EXPERIENCE ONE WAY AND OTHER
21 PEOPLE ANOTHER WAY ISN'T THE ISSUE. AND WHEN I MAKE A RULING I
22 DON'T WANT TO EVER SEE YOU MAKE A FACE OR ROLL YOUR EYES AGAIN.
23 NOW GET BACK TO WORK. LET'S GO. IS THAT UNDERSTOOD?

24 MR. KLEIN: YES, YOUR HONOR.

25 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN
26 COURT IN THE PRESENCE OF THE JURY:)

27 Q. BY MR. KLEIN: PRIOR TO ATTENDING SUMMIT
28 UNIVERSITY HAD YOU SPOKEN AT ANY TIME WITH GREGORY MULL ABOUT

1 HIS EXPERIENCES AT SUMMIT UNIVERSITY?

2 A. YES.

3 Q. AND DID HE DESCRIBE THEM TO YOU?

4 A. YES.

5 Q. YOU SAID THAT WHEN YOU WERE AT COLORADO SPRINGS
6 YOU WERE INSTRUCTED NOT TO CORRESPOND WITH YOUR FAMILY. WAS
7 THAT WHEN YOU WERE AT SUMMIT UNIVERSITY?

8 A. YES.

9 Q. WHEN YOU WERE AT CAMELOT WERE YOU PERMITTED TO
10 CORRESPOND WITH YOUR FAMILY?

11 A. AT CAMELOT, YES. ON STAFF AT COLORADO, NO.

12 Q. WERE YOU TOLD WHEN YOU WERE AT SUMMIT UNIVERSITY
13 THAT IF POSSIBLE YOU SHOULD NOT HAVE COMMUNICATIONS WITH YOUR
14 FAMILY BECAUSE THAT WOULD DISTURB THE RETREAT ATMOSPHERE? WERE
15 YOU EVER TOLD THAT AT SUMMIT UNIVERSITY?

16 A. I MAY HAVE BEEN. HOWEVER, WHATEVER THE REASON WAS
17 I KNOW WE WERE ALLOWED TO CONTACT OUR FAMILIES AND CORRESPOND
18 WITH THEM AND WE WERE ENCOURAGED TO DO SO AFTER THE JIM JONES
19 EPISODE DOWN IN SOUTH AMERICA BECAUSE SO MANY PARENTS OF THE
20 STAFF MEMBERS WERE CONCERNED ABOUT WHAT HAD HAPPENED AT GUYANA.
21 IS THAT THE NAME OF THE PLACE, GUYANA? AND THAT I BELIEVE IS
22 WHAT CHANGED THE POLICY OF THE CHURCH.

23 Q. DO YOU KNOW THAT'S WHAT CHANGED THE POLICY OR ARE
24 YOU JUST GUESSING?

25 A. IT HAPPENED RIGHT AT THAT TIME.

26 Q. ARE YOU MAKING A GUESS IS WHAT YOU'RE TELLING US?

27 A. NO. WE WERE TOLD THAT IT WOULD RELIEVE THE MINDS
28 OF THE PARENTS IF WE WOULD CONTACT THEM. IN FACT, WHERE PRIOR

1 TO THAT TIME IT WAS UNUSUAL FOR STAFF TO TAKE TIME OFF AND GO
2 AND VISIT THEIR FAMILIES THEY WERE ENCOURAGED TO GO AND SEE
3 THEM, TO CONTACT THEM.

4 Q. WHEN DID THAT OCCUR? WHAT YEAR? DO YOU REMEMBER?

5 A. NO.

6 Q. FROM THAT TIME ON DID YOU CONTACT YOUR FAMILY AND
7 HAVE THE RIGHT TO CONTACT YOUR FAMILY WHENEVER YOU WANTED?

8 A. YES.

9 Q. NOW, YOU SAID THAT WHEN YOU WENT TO THE -- TO
10 CAMELOT ONE OF THE REASONS YOU DID WAS BECAUSE YOU WANTED TO BE
11 WITH YOUR CHILDREN; IS THAT RIGHT?

12 A. THAT'S CORRECT.

13 Q. THEN YOU TESTIFIED --
14 WITHDRAW.

15 YOU SAID THAT ONE OF YOUR -- YOUR DAUGHTER HAD
16 BEEN CHASED HOME FROM JR. HIGH SCHOOL, HER LIFE WAS THREATENED?

17 A. YES.

18 Q. THAT WAS BEFORE SHE CAME TO CAMELOT; IS THAT
19 RIGHT?

20 A. THAT'S CORRECT.

21 Q. THAT LIFE BEING THREATENED IN JR. HIGH SCHOOL HAD
22 NOTHING TO DO WITH THE CHURCH, AM I CORRECT? IT WASN'T CHURCH
23 PEOPLE THAT THREATENED HER OR ANYTHING?

24 A. OH, NO. NO. THAT WAS KIDS IN THE JR. HIGH WHERE
25 SHE WAS ATTENDING SCHOOL.

26 Q. IT WAS BECAUSE OF THOSE KIND OF INCIDENTS THAT YOU
27 WANTED TO GO TO CAMELOT?

28 A. I WAS AFRAID FOR MY CHILDREN, YES, BECAUSE I HAD

1 NO CONTROL OVER WHAT WAS HAPPENING TO THEM WHILE I WAS AT WORK.

2 Q. WHEN YOU WENT TO CAMELOT YOU TESTIFIED THAT YOU
3 WORKED IN THE EVENINGS AND YOU WEREN'T ABLE TO SEE YOUR
4 CHILDREN AS MUCH AS YOU WANTED; IS THAT RIGHT?

5 A. THAT'S CORRECT.

6 Q. WHY DIDN'T YOU LEAVE RIGHT THEN?

7 A. MY ALTERNATIVE WAS TO TAKE THEM BACK INTO THE
8 WORLD AND I FELT THAT THERE WAS MORE BENEFIT TO HAVE THEM THERE
9 AT THAT TIME.

10 Q. SO AM I CORRECT THIS WASN'T A SPIRITUAL SITUATION,
11 THIS WAS A SITUATION WHERE YOU CHOSE TO STAY THERE SO THAT YOUR
12 CHILDREN COULD GO TO SCHOOLING AT CAMELOT RATHER THAN TO GO
13 BACK TO THE WORLD AND HAVE THEM RUN OUT OF JR. HIGH SCHOOL AS
14 YOU TESTIFIED?

15 A. NO. IT WAS SPIRITUAL ALSO. IN FACT, I HAD BEEN
16 SEEKING A CHURCH FOR A LONG TIME. I HAD BEEN ATTENDING MANY
17 DIFFERENT CHURCHES. I HAD BEEN GOING TO METAPHYSICAL LECTURES.
18 I HAD BEEN SEEKING TRUTH AND COMING ACROSS THIS ORGANIZATION I
19 SAW THAT IF ELIZABETH CLARE PROPHET WERE IN FACT THE MESSENGER
20 THAT THIS HAD TO BE THE GREATEST THING THAT EVER HAPPENED TO
21 THE EARTH AND IF IN FACT SHE WERE NOT THE MESSENGER IT HAD TO
22 BE THE BIGGEST FRAUD EVER PERPETRATED.

23 Q. YOU SAID THAT YOU WERE SEEKING TRUTH AND WENT TO
24 MANY ORGANIZATIONS; IS THAT RIGHT?

25 A. YES.

26 Q. AND DURING THE COURSE OF INVESTIGATING THESE
27 DIFFERENT ORGANIZATIONS YOU IN EACH INSTANCE OTHER THAN THE
28 CHURCH REJECTED THEM; IS THAT RIGHT?

1 A. WOULD YOU REPEAT THAT?

2 Q. RIGHT. PRIOR TO COMING TO THE CHURCH WHEN YOU
3 WENT TO THESE DIFFERENT ORGANIZATIONS AND YOU INVESTIGATED
4 THEM, YOU TALKED TO THEM, YOU FOUND OUT WHAT THEY WERE ABOUT
5 AND THEN YOU REJECTED THEM, RIGHT?

6 A. YES. I REJECTED SOME OF THESE OTHER OFFBEAT
7 RELIGIONS THAT I WENT TO. BUT I NEVER WITHIN MY HEART REJECTED
8 THE TEACHINGS OF CHRISTIANITY. I HAD DONE IN FACT A GOOD DEAL
9 OF BIBLE STUDY THROUGHOUT MY LIFE AND I FELT I WAS BASICALLY A
10 CHRISTIAN AND I WAS TOLD THAT THIS CHURCH WAS A CHRISTIAN
11 ORGANIZATION.

12 Q. AND THERE CAME A TIME WHEN YOU CHANGED THAT
13 OPINION AND BELIEVED IT WASN'T?

14 A. THAT'S CORRECT.

15 Q. WHY DIDN'T YOU JUST LEAVE ON THAT DAY?

16 A. BECAUSE I HAD NO MONEY. I WAS UNPAID AS A STAFF
17 MEMBER. I HAD NOWHERE TO GO, AND I HAD MY CHILDREN THAT I WAS
18 STILL THINKING ABOUT.

19 Q. AND THEY WERE BEING EDUCATED IN THE CHURCH SCHOOL;
20 ISN'T THAT RIGHT?

21 A. THEY WERE BEING EDUCATED IN THE CHURCH SCHOOL.
22 THAT'S CORRECT.

23 Q. WHEN YOU SAY YOU HAD NO MONEY, YOU WERE NOT PAID
24 AS A STAFF MEMBER, AM I CORRECT? THAT WHEN YOU BECAME A STAFF
25 MEMBER YOU KNEW YOU WEREN'T GOING TO BE PAID; IS THAT CORRECT?

26 A. THAT IS CORRECT.

27 Q. SO THAT WAS THE DEAL THAT YOU MADE?

28 A. THAT IS CORRECT.

1 Q. THIS SITUATION WHERE YOUR DAUGHTER NEEDED RED MEAT
2 DID SHE GET RED MEAT?

3 A. NO, NOT TO MY KNOWLEDGE. I LEFT SHORTLY AFTER
4 THAT.

5 Q. HOW LONG AFTER THAT DID YOU LEAVE?

6 A. OH, VERY SHORTLY.

7 Q. SO YOU DON'T KNOW WHAT EXACTLY WOULD HAVE HAPPEN
8 TO THAT REQUEST HAD YOU NOT LEFT, IS THAT TRUE?

9 A. YES, SHE WAS TURNED DOWN. I KNOW THAT. THEY SAID
10 NO SHE COULDN'T GO. SHE COULDN'T -- THERE WERE SOME CHILDREN
11 ON THE STAFF WHO WERE TAKEN OUT TO EAT HAMBURGERS OCCASIONALLY
12 BUT THAT'S HEARSAY BECAUSE I WAS TOLD THAT. I NEVER SAW IT.
13 BUT I WAS TOLD THAT THERE WERE SOME AND THAT IT MIGHT BE A
14 POSSIBILITY THAT SHE COULD GO ALSO AND GET A HAMBURGER OR HAVE
15 SOME RED MEAT BECAUSE THEY DIDN'T HAVE IT AVAILABLE FOR THE
16 STAFF.

17 Q. WAS THERE ANYTHING STOPPING YOU FROM JUST TAKING
18 HER AND LEAVING IF YOU FELT THAT SHE WASN'T GETTING RED MEAT
19 AND NEEDED IT?

20 A. YES.

21 Q. WHAT?

22 A. COMMITMENT.

23 Q. WHAT COMMITMENT?

24 A. YOU DON'T GO AGAINST WHAT THE CHURCH TELLS YOU TO
25 DO OR YOU'RE OUT. WHAT WAS I GOING TO DO IF I WERE PUT OUT ON
26 THE STREET WITH MY TWO CHILDREN AND NO PLACE TO GO? I HAD SEEN
27 OTHER PEOPLE KICKED OUT OF THE CHURCH AND I WAS QUITE SURE
28 THAT'S WHAT WOULD HAPPEN TO ME AND, FRANKLY, I WAS SCARED.

1 Q. YOU HAVE TALKED ABOUT THE FACT THAT FOR AWHILE YOU
2 LIVED AT CAMELOT AND GREGORY MULL LIVED IN SAN FRANCISCO?

3 A. YES.

4 Q. YOU WANTED TO SEE HIM A CERTAIN AMOUNT OF TIMES
5 PER MONTH BUT YOU WEREN'T ABLE TO GET TO SEE HIM AS MUCH AS YOU
6 WANTED TO?

7 A. THAT'S TRUE.

8 Q. WHY DIDN'T YOU JUST QUIT THEN AND GO LIVE WITH
9 GREGORY MULL IN SAN FRANCISCO?

10 A. GREGORY DIDN'T WANT ME TO.

11 Q. BY THE WAY, ALTHOUGH THE CHURCH DIDN'T GIVE YOU A
12 SALARY IT DID PAY FOR YOUR ROOM AND BOARD AND YOUR CHILDREN'S
13 ROOM AND BOARD; IS THAT RIGHT?

14 A. THAT'S CORRECT.

15 Q. AND THEY PAID FOR YOUR CHILDREN'S TUITION?

16 A. YES.

17 Q. YOU TESTIFIED THERE WAS A TIME WHEN YOU TOLD
18 GREGORY MULL THAT HE SHOULDN'T SELL HIS HOME BECAUSE THE CHURCH,
19 WILL WANT THE MONEY?

20 A. YES.

21 Q. WHEN WAS THAT? ABOUT WHAT MONTH, IF YOU CAN
22 RECALL?

23 A. I CAN'T REMEMBER THE MONTH.

24 Q. WAS IT WHEN HE WAS ALREADY AT CAMELOT?

25 A. I DON'T REMEMBER. IT WAS WHEN HE HAD TALKED ABOUT
26 SELLING IT. I KNOW THAT HE WAS GOING TO HAVE TO SELL IT --

27 Q. MY QUESTION IS, WHAT MONTH WAS IT IF YOU CAN
28 RECALL?

1 A. I DON'T RECALL.

2 Q. AM I CORRECT THAT DISPITE THE FACT THAT YOU FELT
3 THAT IF YOU SOLD THIS HOUSE THE CHURCH WOULD IMMEDIATELY WANT
4 THE MONEY DESPITE THE FACT YOU FELT THEY WERE THAT TYPE OF AN
5 ORGANIZATION YOU REMAINED ON STAFF EVEN AFTER THAT?

6 A. I WAS PLANNING TO LEAVE IN JUNE. I WAS GOING TO
7 WORK OUT SOMEWAY I COULD GO IN JUNE WHEN MY CHILDREN WERE OUT
8 OF SCHOOL. MY DAUGHTER WAS A SENIOR AT MONTESSORI. I KNEW IF
9 GREGORY SAID SOMETHING TO THE CHURCH ABOUT THE WAY I FELT THAT
10 THEY MIGHT ASK ME AND THE CHILDREN TO LEAVE AND MY DAUGHTER HOW
11 WOULD SHE GRADUATE FROM SCHOOL? WHO IS GOING TO TAKE HER IN
12 AND GIVE HER A DEGREE AFTER SHE SPENDS ONLY A COUPLE OF MONTHS
13 WITH THEM?

14 SO I SAID I'M GOING TO LEAVE IN JUNE BUT I WANT TO
15 GO TO ELIZABETH, I WANT TO SIT DOWN, I WANT TO TALK TO HER. AND
16 I WANT THIS TO BE A ONE-ON-ONE THING BETWEEN HER AND ME AND I
17 DON'T WANT YOU TO TALK TO MONROE, I DON'T WANT TO BRING HIM
18 INTO THIS, I JUST WANT THE TWO OF US TO TALK BECAUSE
19 IRRESPECTIVE OF HOW I FELT ABOUT HER MESSENGERSHIP I STILL FELT
20 THAT I HAD A RELATIONSHIP WITH ELIZABETH TO PRESERVE,
21 IRRESPECTIVE OF ANYTHING ELSE.

22 MR. KLEIN: THANK YOU. I HAVE NO FURTHER QUESTIONS.

23 MR. LEVY: JUST A COUPLE, YOUR HONOR.

24

25 REDIRECT EXAMINATION +

26 BY MR. LEVY:

27 Q. HOW LONG HAVE YOU BEEN OUT OF THAT CHURCH NOW?

28 A. IT WILL BE SEVEN YEARS APRIL THE 2ND.

1 Q. BOTTOM LINE DO YOU THINK ELIZABETH CLARE PROPHET
2 AND THAT CHURCH TREATED YOU FAIRLY?

3 A. NO.

4 Q. BOTTOM LINE DO YOU THINK ELIZABETH PROPHET AND
5 THAT CHURCH TREATED GREGORY MULL FAIRLY?

6 A. I WOULD PREFER NOT TO ANSWER THAT.

7 MR. LEVY: THANK YOU.

8 I HAVE NOTHING FURTHER.

9 MR. KLEIN: NOTHING FURTHER, YOUR HONOR.

10 THE COURT: ALL RIGHT. YOU'RE EXCUSED. THANK YOU.

11 MR. KLEIN: YOUR HONOR, I WOULD ASK THAT THE WITNESS NOT
12 BE EXCUSED AND BE AVAILABLE FOR SOME OTHER TIME.

13 THE COURT: HUH?

14 MR. KLEIN: PURSUANT TO EVIDENCE CODE 770, YOUR HONOR,
15 TO REMAIN AVAILABLE.

16 MR. LEVY: MAY WE HAVE THIS STIPULATION, YOUR HONOR.
17 THIS LADY LIVES OUT OF THE CITY. SHE HAS COMMITMENTS THERE.
18 SHE IS A MARRIED LADY; HER HUSBAND HAS BUSINESS COMMITMENTS AND
19 SHE IS EMPLOYED. IF MR. KLEIN INTENDS TO RECALL HER MIGHT HE
20 GIVE HER THE COURTESY OF AT LEAST 24 HOURS' NOTICE SO SHE CAN
21 MAKE HERSELF REAVAILABLE TO THIS COURT?

22 THE COURT: I WILL TELL YOU HOW WE WILL LEAVE IT OFF.
23 IT'S VERY EASY. I WANT YOU TO LET MR. LEVY KNOW HOW YOU CAN BE
24 REACHED AT ANY TIME. IF YOU RECEIVE A CALL TO COME BACK HERE,
25 YOU WILL HAVE AT LEAST 72 HOURS' NOTICE AND IF YOU RECEIVE A
26 CALL FROM MR. LEVY TO COME BACK YOU MUST RETURN. OKAY?

27 THE WITNESS: OKAY.

28 MR. LEVY: I HAVE NOTHING FURTHER OF THIS WITNESS.

1 THANK YOU, MRS. MUELLER.

2 THE WITNESS: THANK YOU WHOEVER.

3 WHO DO THESE BELONG TO?

4 MR. MIDDLETON: GREGORY.

5 MR. LEVY: YOUR HONOR, IN VIEW OF THE HOUR, WE DO HAVE
6 ONE EXPERT WITNESS I DON'T KNOW EXACTLY HOW LONG IT'S GOING TO
7 TAKE FOR THE EXAMINATION OF HER AND THE CROSS-EXAMINATION. IT
8 WOULD MEAN SHE WOULD HAVE TO RETURN TOMORROW. CAN WE HAVE A
9 TWO-MINUTE BREAK TO CONFER WITH HER?

10 THE COURT: YOU JUST WANT TO START TOMORROW MORNING?

11 MR. MIDDLETON: YOUR HONOR, I'M GOING TO BE DOING THE
12 EXAMINATION OF HER AND IT WOULD APPEAR TO ME IN LIGHT OF THE
13 FACT THAT SHE IS GOING TO BE BEGINNING AND IT'S GOING TO BE
14 LENGTHY TESTIMONY WE SHOULD START TOMORROW MORNING FOR
15 CONTINUITY PURPOSES.

16 THE COURT: THAT'S MY THOUGHT ON THE SUBJECT.

17 MR. MIDDLETON: I CONCUR ENTIRELY, YOUR HONOR.

18 THE COURT: WE HAVE HAD A PRETTY FULL DAY. WE WILL
19 RESUME TOMORROW MORNING AT 9:15. HAVE A VERY PLEASANT EVENING.
20 REMEMBER THE COURT'S ADMONITION.

21 (AT 3:56 P.M. AN ADJOURNMENT WAS TAKEN.)

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1 LOS ANGELES, CALIFORNIA; TUESDAY, * FEBRUARY 25, 1986; 9:36 A.M.

2 -000-

3 THE COURT: PLEASE PROCEED.

4 MR. LEVY: YES, YOUR HONOR, AT THIS TIME WE WOULD LIKE
5 WITH THE COURT'S PERMISSION TO RECALL ELIZABETH CLARE PROPHET
6 FOR JUST A FEW QUESTIONS. I WOULD LIKE TO REOPEN THE DIRECT
7 FOR HER.

8 THE COURT: VERY WELL.

9 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AND ASK FOR AN
10 OFFER OF PROOF.

11 THE COURT: IT'S NOT AN APPROPRIATE SITUATION FOR AN
12 OFFER OF PROOF.

13 PLEASE PROCEED.

14 MR. LEVY: THANK YOU.

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

17 THE WITNESS: ELIZABETH CLARE PROPHET FRANCIS.

18 THE CLERK: THANK YOU.

19 MR. LEVY: YOUR HONOR, MAY I APPROACH THE WITNESS?

20 THE COURT: YES.

21 MR. LEVY: FOR THE COURT'S EDIFICATION I HAVE MARKED
22 THIS FOR IDENTIFICATION AS EXHIBIT NUMBER 107 --

23 EXCUSE ME, MR. KLEIN.

24 (COUNSEL SHOWS EXHIBIT TO MR. KLEIN.)

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1 DIRECT EXAMINATION (REOPENED) +

2
3 BY MR. LEVY:

4 Q. WOULD YOU BE KIND ENOUGH TO TAKE A LOOK AT THIS.

5 A. YES.

6 Q. HAVE YOU SEEN THAT DOCUMENT BEFORE OR ONE LIKE IT?

7 A. I'M NOT SURE THAT I HAVE SEEN THIS ONE BUT WE HAVE
8 DECREES LIKE THIS.9 Q. WOULD YOU TELL THE COURT EXACTLY WHAT THE TITLE OF
10 THAT DOCUMENT IS.11 A. THIS SAYS INSERT ON PERSONAL AND IMPERSONAL
12 HATRED.

13 Q. IS THAT A DECREE THAT YOUR CHURCH USES?

14 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT AT THIS
15 POINT. I THINK WE'RE NOW GETTING TO THE AREA OF FIRST
16 AMENDMENT.17 THE COURT: I HAVEN'T HEARD THE QUESTION. I HAVE NO
18 BASIS TO AGREE OR DISAGREE WITH YOU UNTIL I HAVE HEARD THE
19 QUESTION.

20 MR. KLEIN: HE ASKED THE QUESTION.

21 Q. BY MR. LEVY: IS THAT A DECREE THAT YOUR CHURCH
22 UTILIZES?23 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. FREEDOM OF
24 RELIGION AND GETTING INTO RELIGIOUS BELIEFS AT THIS POINT.

25 THE COURT: OVERRULED.

26 THE WITNESS: THIS IS A COPYRIGHT ON IT OF 1979. I'M
27 NOT SURE THAT IT'S IN CURRENT USE.

28 Q. BY MR. LEVY: WAS IT IN USE AT ANY TIME?

1 A. IT WAS COMPOSED BY THE STAFF AND I ASSUME THAT IT
2 WAS USED. AS I SAY WE DO HAVE DECREES LIKE THIS.

3 Q. DOES IT HAVE A CHURCH UNIVERSAL AND TRIUMPHANT
4 COPYRIGHT ON IT?

5 A. YES, IT DOES.

6 Q. THAT'S A DECREE AGAINST PERSONAL AND IMPERSONAL
7 HATRED?

8 A. THAT'S RIGHT.

9 Q. I WOULD TURN TO THE VERY LAST PAGE OF THAT --

10 A. YES.

11 Q. IF YOU LOOK DOWN IS THERE A BLANK SPACE WHERE YOU
12 CAN INSERT INTO THAT DECREE THE NAME OF AN INDIVIDUAL WHOM
13 YOU'RE DECREEBING FOR OR AGAINST?

14 MR. KLEIN: YOUR HONOR, MAY I HAVE A CONTINUING
15 OBJECTION AGAINST QUESTIONS RELATING TO THIS DOCUMENT ON THE
16 GROUNDS OF FIRST AMENDMENT RELIGIOUS FREEDOM?

17 THE COURT: THERE MAY BE SOME QUESTIONS THAT ARE --
18 THERE MAY BE SOME QUESTIONS THAT WILL BE PROPERLY
19 OBJECTIONABLE.

20 MR. KLEIN: YOU WANT ME TO OBJECT EACH TIME? I WOULD
21 OBJECT TO THIS QUESTION AS A VIOLATION OF FIRST AMENDMENT
22 RIGHTS.

23 THE COURT: ONCE AGAIN THE OBJECTION IS OVERRULED.

24 PROCEED, PLEASE.

25 Q. BY MR. LEVY: DO YOU RECALL MY QUESTION?

26 A. YES, I DO.

27 Q. PLEASE RESPOND TO IT.

28 A. THE DECREE IS NOT USED AGAINST INDIVIDUALS BUT

1 AGAINST FORCES OF EVIL OR ACTIONS OF EVIL THAT MAY BE
2 PERPETRATED BY INDIVIDUALS.

3 Q. WAS GREGORY MULL'S NAME EVER FILLED IN IN THAT
4 EMPTY SPACE?

5 A. I HAVE NO IDEA WHAT WAS FILLED IN IN THIS EMPTY
6 SPACE.

7 Q. DID YOUR CHURCH DECREE AGAINST GREGORY MULL ON AN
8 HOUR A DAY BASIS?

9 A. WE HAVE NEVER DECREED AGAINST GREGORY MULL OR ANY
10 PERSONS. WE CALL TO THE LORD GOD AND THE ANGELIC HOST AND
11 JESUS CHRIST TO BIND THE FORCES OF DARKNESS AND EVIL OF DICTION
12 OF POSSESSION AND SO FORTH THAT SOMETIMES WORK THROUGH PEOPLE.

13 Q. AND IN THIS CASE IS THE PERSON WE'RE CONCERNED
14 WITH IS GREGORY MULL WHEN YOU WERE DOING ALL THOSE NICE THINGS
15 AND BINDING UP ALL THOSE SWELL THINGS WERE YOU DOING IT WITH
16 REGARD TO GREGORY MULL?

17 A. NOT TO GREGORY MULL AS A PERSON BUT TO PLANETARY
18 FORCES THAT MAY BE OPPOSING OUR CHURCH THROUGH MALIGNING THAT
19 CHURCH. IT IS NOT THE INDIVIDUAL BUT IT IS THE FORCES THAT WE
20 ARE CONCERNED WITH. THIS IS WHAT OUR LORD HAS TAUGHT US.

21 Q. LET'S SAY THAT GREGORY MULL HAD ALL KIND OF FORCES
22 IN HIM, EVEN SOME OF THAT DELICIOUS ANIMAL MAGNETISM THAT YOU
23 TALKED ABOUT. IF YOU WERE CONCERNED WITH THE FORCES IN HIM
24 WOULD YOU UTILIZE HIS NAME IN THAT DECREE?

25 A. I DON'T --

26 MR. KLEIN: OBJECTION. OBJECTION. THAT CALLS FOR
27 SPECULATION.

28 THE COURT: OVERRULED.

1 THE WITNESS: I DON'T CONSIDER THAT FORCES ARE IN HIM OR
2 IN PEOPLE. I THINK PEOPLE TAKE ACTIONS AND WHEN ACTIONS BECOME
3 DANGEROUS TO OTHER PEOPLE WE PRAY TO THE ANGELIC HOST FOR THE
4 BINDING OF EFFECTS OF THOSE ACTIONS.

5 Q. WELL, THAT'S ALL SWELL. BUT WOULD YOU RESPOND TO
6 MY QUESTION.

7 A. I AM RESPONDING TO YOUR QUESTION.

8 Q. DID YOU UTILIZE GREGORY MULL'S NAME? DID YOUR
9 CHURCH USE GREGORY MULL, HIS NAME, HOWEVER YOU WANT TO EXPLAIN
10 IT, AS ONE OF THE PEOPLE YOU DECREED AGAINST?

11 A. WE DO NOT DECREE AGAINST PEOPLE.

12 Q. DID YOU UTILIZE HIS NAME IN THAT DECREE?

13 A. I DO NOT KNOW WHAT NAMES WERE OR WERE NOT PUT IN
14 THIS DECREE.

15 THE COURT: IN THE RECITATION OF THAT DECREE IS HIS NAME
16 UTTERED?

17 THE WITNESS: I DON'T KNOW. I DON'T KNOW WHAT MY STAFF
18 USED WITH THIS DECREE. I DON'T KNOW IF THEY NAME ORGANIZED
19 CRIME OR THEY NAMED THE FORCES OF THE ANTI-CULT MOVEMENT. WE
20 LOVE PEOPLE. WE DO NOT DECREE AGAINST PEOPLE. WE CALL FOR THE
21 BINDING --

22 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR, AS
23 NONRESPONSIVE, SELF-SERVING.

24 THE COURT: THE LAST PART OF THE WITNESS'S TESTIMONY IS
25 STRICKEN.

26 THE JURY IS DIRECTED TO DISREGARD IT.

27 Q. BY MR. LEVY: WHEN YOU DO THAT DECREE IS ANYONE'S
28 NAME EVER USED WHERE THAT BLANK SPACE IS?

1 A. I DON'T GIVE THIS PARTICULAR DECREE.

2 Q. I'M NOT ASKING YOU. I'M TALKING ABOUT THE CHURCH.

3 MR. KLEIN: I'M GOING TO OBJECT. FIRST AMENDMENT, YOUR
4 HONOR.

5 THE COURT: OVERRULED.

6 THE WITNESS: NAMES OF PEOPLE IDENTIFIED WITH ACTIONS
7 MAY BE INSERTED. THAT DOES NOT MEAN WE DECREE AGAINST THE
8 PEOPLE.

9 Q. FINE. DO YOU DO EXORCISMS?

10 A. YES, I DO.

11 Q. DO YOU DO EXORCISMS ON PEOPLE AT SUMMIT
12 UNIVERSITY.

13 MR. KLEIN: AGAIN I WILL OBJECT, FIRST AMENDMENT RIGHT,
14 YOUR HONOR.

15 THE COURT: OVERRULED.

16 THE WITNESS: YES, I DO.

17 Q. BY MR. LEVY: DO YOU TEACH YOUR FOLLOWERS THAT
18 YOU'RE HERE SPECIFICALLY TO SAVE THIS PLANET?

19 A. I TEACH THAT ALL OF US ARE AN EMBODIMENT TO SAVE
20 THIS PLANET.

21 Q. MA'AM, I DIDN'T ASK YOU ABOUT ALL OF US. I ASKED
22 YOU ABOUT YOU.

23 A. MY ANSWER IS THAT I AM NO DIFFERENT THAN ANYONE.
24 I AM HERE TO HELP SAVE THE PLANET AND ALL MY FOLLOWERS ARE AND
25 ALL PEOPLE OF GOD ARE.

26 MR. LEVY: OBJECTION, YOUR HONOR. NONRESPONSIVE. MOVE
27 TO STRIKE THE BULK OF THE ANSWER.

28 Q. MY QUESTION GOES TO JUST WHAT YOU'RE HERE FOR

1 MA'AM.

2 THE COURT: I'LL LET THE ANSWER STAND.

3 Q. BY MR. LEVY: ONE MORE TIME, ELIZABETH. DO YOU
4 TELL YOUR FOLLOWERS THAT YOUR PURPOSE IS TO SAVE THE PLANET?

5 A. I THOUGHT HE SAID HE WOULD LET THE ANSWER STAND.

6 THE COURT: WHAT IS THAT?

7 THE WITNESS: I THOUGHT YOU JUST SAID YOU WOULD LET THE
8 ANSWER STAND.

9 THE COURT: PLEASE LISTEN TO THE QUESTION.

10 Q. BY MR. LEVY: I'M ASKING YOU SPECIFICALLY ABOUT
11 YOU, NOT ABOUT YOUR FOLLOWERS. HAVE YOU TOLD YOUR FOLLOWERS
12 THAT YOUR PURPOSE IS TO BE HERE TO SAVE THE PLANET?

13 A. THIS IS MY PURPOSE, BUT IT IS NOT EXCLUSIVE TO ME.

14 MR. LEVY: THANK YOU VERY MUCH. I HAVE NOTHING FURTHER.

15 YOUR HONOR, AT THIS TIME WE WOULD ASK THAT THAT
16 DECREE BE ENTERED INTO EVIDENCE AS EXHIBIT 107.

17 MR. KLEIN: I WOULD OBJECT BASED ON FIRST AMENDMENT
18 GROUNDS, YOUR HONOR.

19 THE COURT: OVERRULED. IT'S RECEIVED AS EXHIBIT 107)

20 YOU CAN STEP DOWN --

21 DO YOU HAVE ANY QUESTIONS?

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

23 (COUNSEL CONSULTS WITH ONE OF HIS CLIENTS.)

24 MR. KLEIN: I DO HAVE SOME QUESTIONS, YOUR HONOR.

25 THE COURT: ALL RIGHT. GO AHEAD.

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CROSS-EXAMINATION +

1
2
3 BY MR. KLEIN:

4 Q. WHEN THERE IS A BLANK IN SOME KIND OF A DECREE OR
5 PRAYER ARE THE INDIVIDUALS INSTRUCTED ON WHAT EACH PERSON MUST
6 PUT IN THAT BLANK?

7 A. WHEN YOU COME TO THE BLANK A DECREE LEADER MAY
8 INSERT A PRAYER ON WHATEVER PURPOSE THE PRAYER VIGIL IS BEING
9 HELD FOR. IT COULD BE WORK ON ORGANIZED CRIME, DRUGS, PROBLEMS
10 IN THE SCHOOLS, CHILD MOLESTING. WE WOULD NAME THE SUBJECT AND
11 NAME KEY ORGANIZATIONS OR MOVEMENTS INVOLVED WITH WHATEVER THE
12 CRIME OR WHATEVER THE PROBLEM IS AND ASK THAT THE FORCES OF
13 DEATH AND HELL BE STRIPPED FROM THE SITUATION SO THAT GOD'S
14 WILL AND HIS LIGHT MAY PREVAIL FOR THE BENEFIT OF ALL INCLUDING
15 THOSE WHO MAY BE TEMPORARILY THE PERPETRATORS OF SOME DEED THAT
16 IS NOT IN KEEPING WITH GOD'S LAW.

17 MR. KLEIN: THANK YOU. I HAVE NO FURTHER QUESTION.

18 MR. LEVY: JUST ONE, YOUR HONOR.
19

20 REDIRECT EXAMINATION +

21 BY MR. LEVY:

22 Q. MISS PROPHET, ISN'T IT A FACT THAT IN THAT
23 DOCUMENT THERE IS A BLANK SPACE AND ON ALL THE REST OF THE
24 PAGES IT TELLS YOUR FOLLOWERS WHAT IT IS YOU'RE DECREERING AND
25 WHAT YOU'RE DECREERING FOR AND WHAT GOES IN THAT BLANK SPACE IS
26 SOMEONE'S NAME?

27 A. MAYBE. BUT NOT NECESSARILY.

28 Q. GREGORY MULL'S NAME WENT IN THERE, DIDN'T IT?

1 A. I HAVE NOT GIVEN THAT DECREE WITH GREGORY MULL'S
2 NAME. IF I HAD EVER DONE IT IT WOULD NOT BE AGAINST GREGORY
3 MULL, IT WOULD BE TO LIFT HIM FROM THE BURDENS OF HIS FEAR, THE
4 BURDENS OF WHATEVER PROBLEMS HE WOULD BE HAVING THAT WOULD ALSO
5 BE RESULTING IN A PROBLEM IN OUR CHURCH.

6 MR. LEVY: MAY I HAVE THE DOCUMENT FOR A MOMENT, YOUR
7 HONOR.

8 (JUDGE GIVES DOCUMENT TO MR. LEVY.)

9 Q. IN THIS DECREE YOU TALK ABOUT JUNK FOOD, DON'T
10 YOU?

11 A. I HAVEN'T READ IT. IF YOU WOULD LIKE ME TO I
12 WILL.

13 Q. WHO WROTE THE DECREE?

14 A. IT SAYS THAT IT WAS COMPOSED BY THE STAFF.

15 Q. ARE YOU IN CHARGE OF THE STAFF?

16 A. THE STAFF COMPOSES DECREES ON THEIR OWN.

17 Q. DON'T YOU AUTHORIZE AND EXAMINE EVERYTHING THAT IS
18 DISSEMINATED BY YOUR CHURCH?

19 A. NO, I DO NOT.

20 Q. IT'S COPYRIGHTED WITH THE THE CHURCH'S NAME ON IT.
21 ARE YOU NOT IN CHARGE OF THAT CHURCH?

22 A. EVERYTHING WE PRINT HAS A COPYRIGHT ON IT FOR OUR
23 PROTECTION. I HAVE TOLD THE STAFF THEY CAN COMPOSE PRAYERS AND
24 THEY DO SO.

25 Q. AMONG THE THINGS THAT YOU'RE DECREERING IN HERE IS
26 ABOUT BINDING THE BLACK MAGICIANS, THE WITCHES, THE LITANIES,
27 THE LAGGARDS, THE FALLEN ANGELS AND THE GODLESS CREATION AND
28 THE DEMONS. I THINK YOU EVEN DECREE AGAINST MARIJUANA, DON'T

1 YOU. THE PLACE AT THE BACK WHERE THE FILL IN BLANK IS AT DO
2 YOU ADD MORE THINGS THAN JUNK FOOD?

3 LET'S SEE SO FAR YOU TOLD ME YOU PUT THE MOVEMENT
4 IN THERE, YOU PUT ORGANIZED CRIME. BUT ONE QUESTION. DO YOU
5 PUT THE NAME OF THE PERSON WHOM YOU'RE DECREERING AGAINST? IS
6 THAT WHAT THAT SPACE IS FOR?

7 A. WE DO NOT DECREE AGAINST PEOPLE. I HAVE EXPLAINED
8 THAT.

9 Q. JUST EVERYTHING THAT AFFECTS THEM AND THAT
10 SURROUNDS THEM AND THEIR LIGHT AND THEIR LIFE AND THEIR
11 SURROUNDING CIRCUMSTANCES?

12 A. WE ARE TAUGHT BY JESUS AND THE APOSTLES THAT OUR
13 WARFARE IS NOT OF THE FLESH BUT AGAINST PRINCIPALITIES, POWERS,
14 AND SPIRITUAL WICKEDNESS IN HIGH PLACES. THESE ARE INVISIBLE
15 FORCES THAT AFFECT PEOPLE AND BURDEN MANKIND. WE HAVE PRAYER
16 VIGILS FOR THE PLANET, FOR PEOPLE, FOR OUR CITY AND WHEN THERE
17 ARE PROBLEMS WE GIVE THOSE INSERTS.

18 Q. IS IT ONE OF YOUR TEACHINGS THAT THE SPOKEN WORD
19 CAN AFFECT SOMEONE?

20 MR. KLEIN: I'M GOING TO OBJECT, YOUR HONOR. IT'S
21 BEYOND THE SCOPE OF REDIRECT.

22 THE COURT: OVERRULED.

23 THE WITNESS: THE SPOKEN WORD IS A POWER IN ALL OF US.

24 Q. BY MR. LEVY: DO YOU BELIEVE -- DO YOU TEACH THAT
25 THE SPOKEN WORD CAN AFFECT SOMEONE?

26 A. THE SPOKEN WORD IS AFFECTING US ALL, YES.

27 Q. THAT'S NOT WHAT I ASKED YOU, MA'AM.

28 A. YES, THE SPOKEN WORD AFFECTS US AND SOMEONE --

1 Q. DO YOU TEACH THAT THE SPOKEN WORD CAN AFFECT
2 SOMEONE?

3 A. YES, I DO TEACH THAT.

4 MR. LEVY: THANK YOU. NOTHING FURTHER.

5 MR. KLEIN: NO QUESTIONS, YOUR HONOR.

6 THE COURT: YOU CAN STEP DOWN.

7 MR. LEVY: YOUR HONOR, MAY WE APPROACH THE BENCH JUST
8 MOMENTARILY.

9 THE COURT: ALL RIGHT.

10 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE BENCH:)

11 THE COURT: I WASN'T AS ARTICULATE YESTERDAY AS I SHOULD
12 HAVE BEEN AND I REALIZE THIS MORNING THAT I WASN'T AS
13 INFORMATIVE AS I SHOULD HAVE BEEN AND THE FAULT IS MINE.

14 MR. KLEIN, WHEN I TOLD YOU NOT TO MAKE FACES, ROLL
15 YOUR EYES AND SO FORTH WHEN I MAKE A RULING, I INTENDED BUT
16 OVERLOOKED TELLING YOU THE SAME THING APPLIES WHEN COUNSEL FOR
17 THE PLAINTIFF, MR. MULL'S LAWYERS, ARE ASKING QUESTIONS OR
18 MAKING STATEMENTS OR ALSO WHILE WITNESSES ARE ANSWERING
19 QUESTIONS. YOU ARE -- AT NO TIME ARE YOU TO MAKE FUNNY FACES,
20 EXPRESSIONS, ROLL YOUR EYES, USE YOUR HANDS IN AN EXPRESSION OF
21 DISBELIEF OR DISAGREEMENT. YOU'RE NOT TO DO IT AT ANY TIME
22 WHILE COURT IS IN SESSION, NOT JUST WHEN I'M THE SPEAKER BUT
23 WHEN A WITNESS IS THE SPEAKER, OPPOSING COUNSEL ARE SPEAKING.

24 NOW, WHAT'S THE REQUEST?

25 MR. KLEIN: YOUR HONOR, MAY I JUST RESPOND TO THAT.
26 THAT I AM NOT AWARE OF EVER HAVING DONE THAT. IF I HAVE DONE
27 IT ON SOME OCCASION I APOLOGIZE TO THE COURT. IT'S NOT
28 INTENTIONAL BUT I MUST SAY, YOUR HONOR, THAT I AM NOT AWARE OF

1 HAVING DONE IT TO ANY WITNESSES OR RAISING MY HANDS TO
2 WITNESSES OR MAKING FUNNY FACES OR ANYTHING ELSE.

3 (JUDGE DEMONSTRATES TO COUNSEL.)

4 MR. KLEIN: WHEN I ASK QUESTIONS I ALSO USE MY HANDS AS
5 YOUR HONOR IS POINTING OUT.

6 THE COURT: NOT WHEN YOU'RE SPEAKING -- WHEN OTHERS ARE
7 SPEAKING (DEMONSTRATING) LOOKING UP AT THE CEILING AND ROLLING
8 YOUR EYES AND MAKING A FACIAL EXPRESSION OF DISBELIEF OR
9 DISAGREEMENT. I WILL ACCEPT WHAT YOU SAID THAT IT HAS NOT BEEN
10 INTENTIONAL. I WILL ALSO TELL YOU IT HAS OCCURRED. I THINK WE
11 HAVE TALKED ABOUT THIS ENOUGH.

12 MR. LEVY: THE ONLY COMMENT I WANT TO MAKE IS THE NEXT
13 WITNESS OF MINE WHO IS A DOCTOR WHO WAS SUBPOENAED TO BE HERE
14 AT NINE O'CLOCK THIS MORNING HAS NOT SHOWN. IT'S GOING TO MEAN
15 WE'RE GOING TO GO AHEAD, BUT WE'RE GOING TO GO A LITTLE BIT OUT
16 OF SEQUENCE. IF IT CAUSES A SLIGHT DELAY LATER ON IN THE DAY,
17 I WANTED THE COURT TO BE AWARE OF IT.

18 THE COURT: YOU WANT ME TO ISSUE A SUBPOENA?

19 MR. MIDDLETON: IF HE'S NOT HERE BY NOON YES OR WE CAN
20 ISSUE IT NOW AND HOLD IT UNTIL NOON.

21 THE COURT: I HAVE DONE IT BEFORE, AND I WILL DO IT
22 AGAIN.

23 MR. LEVY: WE'RE READY TO PROCEED.

24 THE COURT: YOU HAVE A COPY OF THE SUBPOENA SHOWING
25 SERVICE ON HIM?

26 MR. LEVY: YES. I SERVED IT MYSELF PERSONALLY.

27 THE COURT: I HOPE IT'S NOT NECESSARY.

28 MR. LEVY: I THINK IT'S PROBABLY JUST TRAFFIC AND I

1 WOULD'N'T WANT TO DO THAT TO HIM. BUT I DID WANT THE COURT TO
2 BE AWARE.

3 THE COURT: I DON'T LIKE TO DO THOSE THINGS, BUT I SURE
4 AS HELL WILL IF HE DOESN'T SHOW UP.

5 MR. KLEIN: I THINK HE'S AFRAID OF KLEIN.

6 THE COURT: THAT MAY BE.

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1 LOS ANGELES, CALIFORNIA; TUESDAY, FEBRUARY 25, 1986; 9:36 A.M.

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4 MR. LEVY: YOUR HONOR, AT THIS TIME WE'RE GOING TO CALL
5 MISS KATHLEEN LEVY, SAME LAST NAME AS MINE.

6 (COUNSEL LEAVE COURTROOM.)

7 MR. LEVY: YOUR HONOR, IN KEEPING WITH WHAT WE ADDRESSED
8 THE COURT ABOUT BEFORE, WE DO HAVE ANOTHER WITNESS HERE AND I
9 HAVE SUGGESTED TO THE COURT WE MAY GO A LITTLE BIT OUT OF SYNC
10 AT THIS TIME. INSTEAD OF MISS KATHLEEN LEVY, WE CALL RABBI
11 STEPHEN ROBBINS TO THE STAND.

12
13 RABBI STEPHEN ROBBINS,
14 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
15 AS FOLLOWS:

16 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.
17 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL
18 YOUR FIRST AND LAST NAME.

19 THE WITNESS: RABBI STEPHEN ROBBINS, S-T-E-P-H-E-N
20 R-O-B-B-I-N-S.

21 THE CLERK: THANK YOU.

22
23 DIRECT EXAMINATION

24 BY MR. LEVY:

25 Q. RABBI ROBBINS, WOULD YOU TELL THE COURT ABOUT YOUR
26 INFORMAL EDUCATION.

27 A. YOU MEAN AS REGARDS TO MY EXPERIENCE WITH DEALING
28 WITH VARIOUS KINDS OF RELIGIOUS ORGANIZATIONS AND COUNSELING?

1 Q. YES, SIR.

2 A. IN THE PROCESS OF MY TRAINING AS A RABBI, THERE
3 WERE A NUMBER OF CLASSES OFFERED AT THE SEMINARY WHICH THEN
4 EXPANDED INTO MY OWN PERSONAL EDUCATION IN DOING COUNSELING,
5 PSYCHOTHERAPY, FAMILY THERAPY, ET CETERA. I STUDIED AT THE
6 GESTALT INSTITUTE IN LOS ANGELES, THE FAMILY INSTITUTE IN
7 CINCINNATI; AS A RESULT OF THAT EXPERIENCE WAS HIRED BY THE
8 UNIVERSITY OF CINCINNATI DEPARTMENT OF PSYCHOLOGY, HUMAN
9 RELATIONS INSTITUTE TO TEACH STUDENTS HOW TO DO SMALL GROUP
10 THERAPY AND TO DO FAMILY INTERVENTION.

11 Q. NOW, WOULD YOU BRIEFLY TELL US ABOUT YOUR FORMAL
12 EDUCATION.

13 A. I WAS EDUCATED AT UCLA WHERE I RECEIVED MY
14 BACHELORS. AT THAT TIME I WAS AT HEBREW UNION COLLEGE WHERE I
15 STUDIED; WAS ORDAINED AS A RABBI IN 1972.

16 Q. NOW, WHEN YOU WERE AT UCLA, WHAT WERE THE COURSES
17 YOU TOOK AT UCLA?

18 A. HISTORY, SOCIOLOGY WERE MY MAJORS WITH A MINOR IN
19 PHILOSOPHY.

20 Q. ASIDE FROM YOUR UNDERGRADUATE WORK, DID YOU
21 RECEIVE ANY DEGREES FROM UCLA?

22 A. NO. I RECEIVED NO GRADUATE DEGREES FROM UCLA
23 UNDERGRADUATE. MY GRADUATE DEGREES WERE FROM HEBREW UNION
24 COLLEGE.

25 Q. WHAT WAS THAT DEGREE?

26 A. MASTER OF ARTS OF HEBREW LETTERS AND MASTER OF
27 ARTS OF HISTORY.

28 Q. WOULD IT BE ACCURATE TO SAY THAT DURING THE 60'S,

1 DURING YOUR STUDENT DAYS, YOU WERE INVOLVED IN DIFFERENT
2 AFFAIRS THAT CONCERNED GROUPS THAT MIGHT BE CATEGORIZED AS NEW
3 WAIVE GROUPS?

4 A YES. MY EXPERIENCE ACTUALLY BEGAN IN THE 50'S AS
5 A TEENAGER WHEN IN THE PROCESS OF MY OWN RELIGIOUS SEARCH I
6 EXPLORED NUMEROUS RELIGIOUS TRADITIONS, PHILOSOPHIES, AND
7 SOCIAL GROUPINGS IN ORDER TO SEARCH FOR SOME SENSE OF
8 UNDERSTANDING ABOUT THE MEANING OF LIFE. IN THE 50'S I BECAME
9 INVOLVED IN THE CIVIL RIGHTS MOVEMENT AND IN THE 60'S WAS A
10 PART OF WHAT A LOT OF COLLEGE STUDENTS WERE INVOLVED IN, NEW
11 CULTURES DEALING WITH NEW RELIGIONS, ET CETERA. AND IT WAS IN
12 THAT PROCESS THAT I BECAME MORE AND MORE CONCERNED ABOUT THE
13 NATURE OF INTERRELIGIOUS LIFE IN AMERICA.

14 Q. HAVE YOU BEEN CONNECTED WITH ANY UNIVERSITIES
15 OUTSIDE OF CALIFORNIA?

16 A. THE TEACHING AT THE UNIVERSITY OF CINCINNATI AND
17 IN ADDITION I WAS THE CAMPUS RABBI FORMALLY CALLED THE DIRECTOR
18 OF THE B'NAI B'RITH HILLEL FOUNDATION — HILLEL IS SPELLED —
19 THAT'S H-I-L-L-E-L, AT THE UNIVERSITY OF CINCINNATI. I WAS IN
20 THAT POSITION FOR THREE YEARS AND THEN I WAS — THEN I CAME TO
21 CALIFORNIA.

22 Q. AFTER YOU CAME TO CALIFORNIA, DID YOU ALIGN
23 YOURSELF WITH ANY TEACHING FACILITY?

24 A. I WAS THE B'NAI B'RITH HILLEL DIRECTOR AT THE
25 UNIVERSITY OF CALIFORNIA AT BERKELEY. IN MY CAPACITY THERE, I
26 WAS HIRED BY A NUMBER OF UNIVERSITIES IN THE BAY AREA TO TEACH.
27 I WAS AN ADJUNCT FACULTY AT UC BERKELEY AND THE FACULTY FOR THE
28 CENTER JEWISH STUDY OF THE GRADUATE THEOLOGICAL UNION. I

1 TAUGHT AT THE JESUIT SCHOOL OF THEOLOGY AND BIBLE, CHURCH
2 DIVINITY SCHOOL OF THE PACIFIC; I ALSO TAUGHT AT JOHN F.
3 KENNEDY UNIVERSITY AND HAYWARD STATE UNIVERSITY.

4 Q. DURING THESE YEARS, DID YOU MAKE A STUDY OF WHAT
5 HAS BEEN CATEGORIZED AS THE NEW WAIVE RELIGIONS?

6 A. MY STUDY OF THOSE RELIGIONS BEGAN IN CINCINNATI IN
7 ABOUT 1969, 1970.

8 Q. WOULD YOU TELL US WHICH ONES THAT YOU PARTICIPATED
9 IN THE STUDY OF?

10 A. A GROUP CALLED THE CHILDREN OF GOD AND SOME
11 PRELIMINARY WORK IN THE UNIFICATION CHURCH ALSO THE PHENOMENON
12 KNOW AS BORN AGAIN CHRISTIANITY WHICH WAS JUST BEGINNING TO
13 MAKE ITS EMERGENCE THEN. THAT WAS IN CINCINNATI.

14 Q. HAVE YOU DONE FURTHER STUDIES IN THE HARE KRISHNA
15 MOVEMENT OR SCIENTOLOGY?

16 A. WHEN I WENT TO THE UNIVERSITY OF CALIFORNIA
17 BERKELEY AND BEGAN TO NOTICE THE NATURE OF RELIGIOUS SPIRITUAL
18 LIFE ON THE CAMPUS, I NOTICED THE ACTIVITIES OF THE UNIFICATION
19 CHURCH, THE CHURCH — SCIENTOLOGY, HARE KRISHNA AND A WHOLE
20 PLETHORA OF OTHER TYPE ORGANIZATIONS, MOST OF WHICH ARE NOT AS
21 WELL KNOWN; IN THAT PROCESS BECAME CONCERNED ABOUT WHAT WAS
22 SOME CHAOS DEVELOPING ON THE CAMPUSES; WAS CONTACTED BY NUMBERS
23 OF PARENTS BOTH JEWISH AND NONJEWISH WHO HAD LOST THEIR
24 CHILDREN AND COULDN'T FIND THEM; AT THE SAME TIME WAS REQUESTED
25 BY THE UNIVERSITY OF CALIFORNIA TO LEAD A RESEARCH PROGRAM FOR
26 THE CAMPUS MINISTRIES THERE ABOUT THE NATURE OF THE MISSING
27 STUDENT PROBLEM AT BERKELEY AND THE INVOLVEMENT OF RELIGIOUS
28 STYLE ORGANIZATIONS IN HELPING TO REMOVE STUDENTS FROM THE

1 CAMPUS. WITHIN THAT PROCESS -- IT WAS WITHIN THAT PROCESS THAT
2 I BECAME MORE FAMILIAR WITH CHURCH UNIVERSAL & TRIUMPHANT IN
3 THE MIDDLE, LATER 60'S.

4 Q. YOU IDENTIFIED YOURSELF AS RABBI STEPHEN ROBBINS,
5 IS THAT THE TITLE YOU HOLD AT THE PRESENT TIME, RABBI?

6 A. YES, IT IS.

7 Q. WITH WHAT GROUP ARE YOU A RABBI?

8 A. TEMPLE EMANUEL, BEVERLY HILLS, CALIFORNIA.

9 Q. DURING THE YEARS 1979-1985 WERE YOU THE HEAD OF
10 ANY COMMITTEES OR TASK FORCE CONNECTED WITH THAT TEMPLE IN THE
11 JEWISH COMMUNITY?

12 A. FROM THAT PERIOD OF TIME, I WAS THE CHAIRMAN OF
13 THE TASK FORCE ON CULT AND MISSIONARY EFFORTS FOR THE JEWISH
14 COMMUNITY RELATIONS COMMITTEE OF THE JEWISH FEDERATION COUNCIL
15 OF GREATER LOS ANGELES. THAT ORGANIZATION IS THE PUBLIC
16 RELATIONS ARM OF THE ORGANIZED JEWISH COMMUNITY OF LOS ANGELES.

17 Q. WOULD YOU TELL US AGAIN WHEN YOU FIRST BECAME
18 INVOLVED IN THE STUDY OF THE CHURCH UNIVERSAL & TRIUMPHANT?

19 A. I CAN'T DATE THE YEAR EXACTLY. IT WOULD BE
20 SOMEWHERE IN THE MIDDLE TO LATE 70'S. I CAME TO LOS ANGELES
21 FROM BERKELEY IN 1978. I HAD SOMEWHERE IN THOSE LATER YEARS
22 GONE TO A NUMBER OF LECTURES OR PROGRAMS GIVEN BY THE CHURCH.

23 Q. WHY DID YOU GET INVOLVED AND AIM YOUR FOCUS OF
24 STUDY ON CHURCH UNIVERSAL & TRIUMPHANT?

25 A. IT WAS NOT INITIALLY AIMED AT THE CHURCH UNIVERSAL
26 & TRIUMPHANT BY ITSELF. IT WAS PART OF THE WHOLE PANORAMA OF
27 WHAT I HAD BEGUN TO SEE AS COERCIVE RELIGIOUS ORGANIZATIONS.
28 INITIALLY, MY MAJOR FOCUS HAD BEEN UNIFICATION CHURCH AND THE

1 CHURCH OF SCIENTOLOGY. BUT AS I BECAME MORE AND MORE AWARE OF
2 THE NATURE OF COLLEGE LIFE AND THE ACTIVITIES OF THESE GROUPS,
3 I BEGAN TO REALIZE THAT THERE WAS A GREAT PHENOMENA, A
4 MULTIPLICITY OF GROUPS WORKING COLLEGE CAMPUSES, SURROUNDING
5 ENVIRONS PROSELYTIZING AND MISSIONIZING STUDENTS IN SOME VERY
6 DESTRUCTIVE WAYS. SO THAT WITHIN MY CAPACITY AS RABBI ON THE
7 CAMPUS, I FELT IT WAS IMPORTANT FOR ME TO KNOW WHAT WAS GOING
8 ON RELIGIOUSLY ON THE CAMPUS AND IT WAS WITHIN THAT CONTEXT
9 THAT I EXPLORED A NUMBER OF ORGANIZATIONS AND IN THIS CASE
10 SPECIFICALLY CHURCH UNIVERSAL & TRIUMPHANT.

11 Q. WHAT DID THE TASK FORCE DO EXACTLY?

12 A. THE PURPOSE OF THE TASK FORCE IN LOS ANGELES WAS
13 VARIED. FIRST OF ALL TO EXPLORE THE NATURE OF RELIGIOUS
14 ORGANIZATIONS WHO USED INTENSIVE MANIPULATIVE PROSELYTIZING
15 TECHNIQUES ON A VARIETY OF PEOPLE IN SOCIETY. INITIALLY,
16 MOSTLY STUDENTS; THEN IT EXPANDED INTO DIFFERENT ELEMENTS OF
17 ADULT LIFE.

18 IN THE PROCESS OF TRYING TO LEARN ABOUT THOSE
19 GROUPS AND HOW THEY FUNCTION, WE MADE OURSELVES AVAILABLE TO
20 PEOPLE WHO HAVE BEEN INVOLVED IN SUCH GROUPS AND WERE CONFUSED,
21 DIDN'T UNDERSTAND WHAT HAD HAPPENED TO THEM. SO WE ESTABLISHED
22 A CLINIC THROUGH THE JEWISH FAMILY SERVICE IN WHICH FAMILIES
23 WHO HAD LOST MEMBERS TO VARIOUS RELIGIOUS ORGANIZATIONS THROUGH
24 COERCIVE PRACTICES AND/OR MEMBERS OF SUCH GROUPS COULD COME TO
25 EXPLORE THE FEELINGS THAT THEY WERE HAVING AND THE DYNAMICS
26 WITHIN THEIR FAMILIES.

27 AS THAT EXPERTISE DEVELOPED, WE BEGAN TO BE
28 CONTACTED BY BOTH CIVIC, LEGISLATIVE, LAW ENFORCEMENT, AND

1 PRIVATE ORGANIZATIONS ASKING US FOR INFORMATION ABOUT GROUPS IN
2 AN ATTEMPT TO UNDERSTAND THE PHENOMENA OF THESE ORGANIZATIONS
3 IN GENERAL. WE BEGAN THEN A PROCESS OF EDUCATING PEOPLE IN THE
4 COMMUNITY ABOUT WHAT WE HAD LEARNED. AT THE SAME TIME WE FOUND
5 OURSELVES IN THE POSITION OF EDUCATING YOUNG ADULTS,
6 PARTICULARLY THOSE IN HIGH SCHOOL AND COLLEGE, ABOUT THE NATURE
7 OF SUCH PROSELYTIZING ACTIVITIES BY COERCIVE RELIGIOUS
8 ORGANIZATIONS AND DID LECTURES IN SCHOOLS AND ON THE UNIVERSITY
9 CAMPUSES AND IN CHURCHES, IN SYNAGOGUES, IN ALL FORMS OF
10 COMMUNITY LIFE.

11 THE TASK FORCE FOUND ITSELF PRIMARILY IN THE
12 EDUCATIVE PROCESS FOR THE COMMUNITY. WE WERE CONSULTED BY BOTH
13 FEDERAL LAW ENFORCEMENT AGENCIES AND BY STATE AND LOCAL LAW
14 ENFORCEMENT AGENCIES WHEN CERTAIN PRACTICES WOULD COME TO
15 LIGHT. WITHIN THAT CONTEXT I HAVE EVEN WORKED WITH SUCH
16 ORGANIZATIONS AS THE FBI AND THE CIA.

17 Q. NOW, WHEN YOU WORKED IN THE TASK FORCE, DID YOU
18 WORK AS A RABBI WITH THE PEOPLE OR AS AN INDIVIDUAL PERSON OR
19 BOTH?

20 A. BY IN LARGE MY WORK WOULD BE AS A RABBI. PEOPLE
21 WOULD COME TO ME WANTING TO TALK VERY PRIVATELY AND VERY
22 CONFIDENTIALLY AS ONE WOULD TALK TO A RABBI OR PRIEST ABOUT
23 WHAT HAD HAPPENED TO THEM. WITHIN THE JEWISH COMMUNITY, A
24 RABBI ALWAYS FUNCTIONS AS A RABBI. THOSE PLACES OUTSIDE THE
25 JEWISH COMMUNITY WHERE I FUNCTIONED, I DID NOT FUNCTION AS A
26 REPRESENTATIVE OF MY SYNAGOGUE BUT AS A PRIVATE PERSON OR
27 SOMETIMES AS A REPRESENTATIVE OF THE TASK FORCE WHICH I WAS
28 CHAIRING.

1 Q. DID YOUR ORGANIZATION KEEP EXTENSIVE NOTES AND
2 RECORDS OF THE PEOPLE YOU COUNSELED WITH?

3 A. THE ORGANIZATION, THE TASK FORCE, AND THE CLINIC
4 KEEPS RECORDS. MY — I DO NOT KEEP PRIVATE RECORDS OF MY
5 CONSULTATIONS WITHIN CERTAIN LIMITATIONS BECAUSE OF THE PRIEST
6 PENITENT RELATIONSHIP BETWEEN A RABBI AND PEOPLE WHO COME TO
7 COUNSEL HIM.

8 Q. WHEN YOU MADE YOUR INVESTIGATION OF THESE GROUPS
9 THAT I WILL CHARACTERIZE AS THE NEW WAIVE RELIGIONS, DID YOU
10 EVER FOCUS ON THIS BELIEF SYSTEM?

11 A. NO, I REALLY WAS NOT CONCERNED WITH WHAT THESE
12 VARIOUS GROUPS BELIEVED. IT IS MY PERSONAL BELIEF THAT PEOPLE
13 ARE ENTITLED TO BELIEVE WHATEVER THEY WISH. WHETHER I AGREE OR
14 NOT WAS NOT THE POINT. MY CONCERN WAS PRIMARILY HOW THESE
15 ORGANIZATIONS TREATED OTHER PEOPLE THROUGH THEIR JUSTIFICATION
16 BY FAITH.

17 IN OTHER WORDS, I FOUND PEOPLE BEING TREATED IN
18 VERY DESTRUCTIVE WAYS. I FOUND THEIR FAMILY MEMBERS BEING
19 TREATED IN VERY DESTRUCTIVE WAYS AS AN EXPRESSION OF THE FAITH
20 OF THESE GROUPS. IT WAS MY EXPERIENCE THAT PEOPLE'S
21 PERSONALITIES WERE BEING SERIOUSLY MANIPULATED, THAT THEIR
22 FAMILIES WERE BEING INVADED AND MANIPULATED. MY CONCERN HAS
23 ALWAYS BEEN THAT THESE KINDS OF ORGANIZATIONS BEHAVE WITHIN
24 WHAT I WOULD CALL THE SOCIAL CONVENTION OF APPROPRIATE MORALITY
25 BETWEEN HUMAN BEINGS AND THAT'S ALWAYS BEEN THE FUNDAMENTAL
26 CORE OF MY CONCERN. I BELIEVE THAT ANY GROUP HAS A RIGHT TO
27 EXIST AND EXPRESS ITS OWN RELIGIOUS DOCTRINES BUT NOT
28 COERCIVELY, DECEITFULLY OR MANIPULATIVELY.

1 Q. ARE THERE CHARACTERISTICS THAT MIGHT BE CONSIDERED
2 CULT ENTRAPMENT OR RECRUITMENT? ARE THERE SPECIFIC
3 CHARACTERISTICS THAT WOULD FALL INTO THAT AREA?

4 A. THERE ARE A NUMBER.

5 Q. WOULD YOU PLEASE TELL US WHAT THAT NUMBER IS AND
6 EXPLAIN THEM TO US.

7 A. FIRST OF ALL, ONE OF THE PRIMARY EXPERIENCES IS
8 THAT PEOPLE BECOME INVOLVED IN THESE ORGANIZATIONS USUALLY NOT
9 BECAUSE THEY SEEK THEM OUT BUT BECAUSE THESE INDIVIDUALS ARE
10 SOUGHT OUT BY THE ORGANIZATIONS. THEY BECOME IN A SENSE
11 TARGETED EITHER BECAUSE THE ORGANIZATION WANTS TO INCREASE ITS
12 MEMBERSHIP OR BECAUSE THE INDIVIDUALS WHO ARE TARGETED HAVE
13 SOMETHING WHICH THE ORGANIZATION FEELS WOULD HELP IT AND BE
14 POSITIVE.

15 BECAUSE OF THAT TARGETING, THE ORGANIZATIONS, THE
16 RELIGIOUS ORGANIZATION OR QUASI-RELIGIOUS ORGANIZATIONS TEND
17 NOT TO EXPRESS TO THE POTENTIAL CONVERT THEIR TOTAL AND
18 COMPLETE AGENDA, THEIR FULL SYSTEM OF BELIEF, THE ROLE OF THE
19 AUTHORITY OF THE RELIGION IN THEIR LIFE, WHAT OBLIGATIONS AND
20 RESPONSIBILITIES THEY MUST HAVE; WHAT THEY MUST DO AND GIVE UP
21 FOR MEMBERSHIP IS NEVER LAID OUT AT THE BEGINNING. MY
22 EXPERIENCE WITH PEOPLE WHO HAVE BEEN IN PSUEDORELIGIOUS
23 ORGANIZATIONS, NEW WAIVE RELIGIONS OR COERCIVE RELIGIOUS
24 COMMUNITIES HAVE ALWAYS EXPRESSED TO ME THEY NEVER REALLY KNEW
25 WHAT THEY WERE GETTING INTO UNTIL IT WAS TOO LATE. IT IS THAT
26 ISSUE OF DECEPTIVENESS WHICH IS AT THE CORE OF MY CONCERN.

27 ANOTHER THING THAT TENDS TO BE A --

28 MR. KLEIN: YOUR HONOR, MAY I MAKE AN OBJECTION. I

1 THINK THAT THE WITNESS IS GETTING TO A POINT WHERE HE'S
2 TESTIFYING WITH AN EXPERTISE THAT I DON'T BELIEVE HE HAS AND I
3 WOULD OBJECT AS TO A LACK OF FOUNDATION IN THAT REGARD.

4 THE COURT: WELL, I'M PREPARED TO OVERRULE THAT
5 OBJECTION. BUT IF YOU WANT TO ASK HIM A FEW QUESTIONS ON VOIR
6 DIRE —

7 MR. KLEIN: I WOULD LIKE THAT.

8 THE COURT: — CONCERNING HIS EXPERTISE, I WOULD
9 CERTAINLY GIVE YOU THE CHANCE TO DO THAT.

10 MR. KLEIN: I WOULD LIKE THAT, YOUR HONOR.

11 THE COURT: OKAY.

12 MR. KLEIN: THANK YOU.

13

14

VOIR DIRE EXAMINATION

15 BY MR. KLEIN:

16 Q. HAVE YOU HAD CONSULTATIONS WITH MEMBERS FROM
17 CHURCH UNIVERSAL & TRIUMPHANT?

18 A. I HAVE HAD CONSULTATIONS WITH PEOPLE WHO WERE
19 MEMBERS OF CHURCH UNIVERSAL & TRIUMPHANT.

20 Q. HOW MANY?

21 A. A HANDFUL.

22 Q. LESS THAN FIVE.

23 MR. LEVY: EXCUSE ME, YOUR HONOR. I DON'T BELIEVE THAT
24 GOES TO THIS WITNESS' EXPERTISE WITH REGARD TO A STUDY OF THE
25 CULT PHENOMENON

26 THE COURT: I AGREE.

27 MR. LEVY: I WOULD OBJECT TO THIS LINE OF VOIR DIRE.

28 Q BY MR. KLEIN: HAVE YOU HAD ANY — CAN YOU TELL US

1 WHAT PSYCHOLOGY EXPERTISE YOU HAVE, WHAT EXPERTISE YOU HAVE IN
2 THE AREA OF PSYCHOLOGY.

3 MR. LEVY: I'M GOING TO OBJECT TO THAT ALSO, YOUR HONOR.
4 THIS WITNESS HAS NOT TESTIFIED TO ANY EXPERTISE IN THE AREA OF
5 PSYCHOLOGY. BUT HE HAS TOLD US ABOUT SOCIOLOGY AND HISTORY AND
6 HE HAS TOLD US ABOUT AN EXTENSIVE BACKGROUND IN THE CULT
7 RELATED MOVEMENTS AND WORKING FOR FEDERAL AGENCIES AND HIS
8 CONSULTATION WITH THOSE GROUPS. IF THE FEDERAL GOVERNMENT OF
9 THE UNITED STATES THINKS HE'S QUALIFIED ENOUGH TO LISTEN TO HIS
10 ADVICE -- HE HAS SO FAR SAID NOTHING ABOUT PSYCHOLOGY. I THINK
11 MR. KLEIN IS FOR HIS VOIR DIRE --

12 THE COURT: I HAVE HEARD ENOUGH. I AGREE.

13 DO YOU WANT TO -- DO HAVE YOU HAVE ANY OTHER
14 QUESTIONS?

15 MR. KLEIN: MY POINT WOULD SIMPLY BE, YOUR HONOR --

16 THE COURT: THIS IS YOUR OPPORTUNITY TO ASK SOME
17 QUESTIONS, IF YOU WISH TO DO SO, OR ELSE WE WILL LET MR. LEVY
18 CONTINUE.

19 MR. KLEIN: YES, I DO, YOUR HONOR.

20 THE COURT: I WOULD URGE YOU CONSTRUCTIVELY TO
21 CONCENTRATE ON THE AREA IN WHICH THIS WITNESS IS PRESENTED AS
22 AN EXPERT.

23 MR. LEVY: EXCUSE ME, YOUR HONOR, BEFORE WE PROCEED.
24 THE WITNESS WE TOLD YOU ABOUT BEFORE IS UNAWARE HE CANNOT
25 ENTER. HE HAS JUST COME INTO THE COURTROOM.

26 PHIL, WOULD YOU ESCORT DR. AFSHAR OUTSIDE.

27 (CO-COUNSEL COMPLIES.)

28 THE COURT: WELL, I'M NOT GOING TO -- TELL HIM NOT TO GO

1 TOO FAR AWAY.

2 MR. LEVY: ONE COMMENT, YOUR HONOR. BEING NOT
3 ORIGINALLY FROM THE UNITED STATES IT'S UNDERSTANDABLE HIS
4 CONFUSION WITH OUR SYSTEM HERE.

5 THE COURT: ANY OTHER QUESTIONS?

6 MR. KLEIN: YES, YOUR HONOR.

7 THE COURT: ALL RIGHT.

8 Q BY MR. KLEIN: YOU TALKED ABOUT PEOPLE NOT KNOWING
9 THE TOTAL AGENDA. DID YOU HAVE ANY DISCUSSIONS WITH ANYBODY
10 FROM CHURCH UNIVERSAL —

11 MR. LEVY: EXCUSE ME, YOUR HONOR. I'M GOING TO OBJECT
12 AGAIN. THIS IS SUPPOSED TO BE VOIR DIRE ABOUT THIS WITNESS'
13 ABILITY TO TESTIFY EXPERTLY. IT'S NOT CROSS-EXAMINATION.

14 THE COURT: THE OBJECTION SUSTAINED. CROSS-EXAMINATION
15 WILL BE LATER. THIS IS VOIR DIRE CONCERNING HIS EXPERTISE IN
16 CERTAIN AREAS.

17 Q BY MR. KLEIN: WHAT EXPERTISE DO YOU HAVE IN THE
18 AREA OF COUNSELING?

19 A. THE TRAINING THAT I WENT THROUGH WITHIN THE
20 SEMINARY WHICH PREPARES US TO DO PASTORAL COUNSELING. MY
21 TRAINING IN VARIOUS INSTITUTES IN TECHNIQUES THAT DEAL WITH
22 SPECIFIC KINDS OF PROBLEMS, FOR EXAMPLE, FAMILY THERAPY. AND
23 MY TEACHING, MY BEING HIRED TO TEACH IN A QUALIFIED INSTITUTION
24 WHICH TRAINS PSYCHOLOGISTS, BOTH CLINICAL AND RESEARCH. AND
25 WITHIN THE STATE OF OHIO, I WAS A LICENSED THERAPIST. I DID
26 NOT PURSUE A LICENSE IN THE STATE OF CALIFORNIA BECAUSE I HAD
27 NO INTENTION OF DOING PROFESSIONAL COUNSELING.

28 Q. WHAT EXPERIENCE, TRAINING DO YOU HAVE IN THE AREA

1 OF COUNSELING PEOPLE WHO HAVE EXITED FROM A NEW AGE RELIGION?

2 A. I HAVE BEEN DOING THAT FOR ABOUT 15 YEARS

3 Q I UNDERSTAND THAT YOU HAVE BEEN DOING IT. MY
4 QUESTION IS WHAT IS YOUR TRAINING, IF ANY, TO DO IT?

5 A THAT'S AN INTERESTING QUESTION BECAUSE AT THE TIME
6 THAT I BEGAN DOING IT NOBODY KNEW HOW TO DO IT. IT WAS A
7 PHENOMENA WHICH DOES NOT FIT INTO THE NORMAL CATEGORY OF
8 PSYCHOLOGY THOUGH IT HAS A DIRECT RELATIONSHIP. MY PROCESS OF
9 EDUCATION IN THE SYSTEMS OF PSYCHOLOGY AND PSYCHOTHERAPY I
10 DESCRIBED PLUS MY BACKGROUND IN SPIRITUAL MATTERS AS A
11 PROFESSIONAL RELIGIOUS PERSON AND AS A RABBI MADE IT POSSIBLE
12 FOR ME TO PUT TOGETHER TECHNIQUES WHICH WOULD MANIPULATE AND
13 USE PEOPLE'S SPIRITUAL AND RELIGIOUS REALITY TIED IN TO
14 PSYCHOLOGICAL PROCESSES WHICH WOULD SERIOUSLY INFLUENCE THE
15 NATURE OF THEIR BELIEF AND THEIR ATTITUDES ABOUT THEMSELVES AND
16 GOD.

17 Q. DOES THAT MEAN YOU HAVE NO FORMAL EDUCATION OR
18 TRAINING IN THE AREA OF COUNSELING PEOPLE WHO HAVE LEFT A NEW
19 AGE RELIGION.

20 MR. LEVY: I'M GOING TO OBJECT TO THAT. THAT'S A
21 MISCHARACTERIZATION --

22 THE COURT: SUSTAINED.

23 Q. BY MR. KLEIN: DO YOU HAVE ANY FORMAL EDUCATION,
24 TRAINING COURSES THAT YOU TOOK ANYWHERE THAT DEALT WITH PEOPLE
25 WHO HAVE EXITED FROM NEW AGE RELIGION --

26 MR. LEVY: I'M GOING TO OBJECT TO THAT ALSO. THIS
27 WITNESS HAS JUST TESTIFIED AS TO THE DEVELOPMENT OF THAT AREA
28 OF COUNSELING. IT'S BEEN ASKED AND ANSWERED.

1 THE COURT: HE CAN ANSWER FOR WHATEVER WEIGHT IT MIGHT
2 HAVE.

3 THE WITNESS: THERE ARE NO SUCH CLASSES IN ANY
4 UNIVERSITY IN ANY PSYCHOLOGICAL DEPARTMENT IN THE COUNTRY. I
5 HAVE BEEN HIRED AND REQUESTED BY A NUMBER OF INSTITUTIONS TO
6 COME IN AND LECTURE AND TEACH TO THOSE WHO ARE BEING EDUCATED.
7 FOR EXAMPLE, THE NEUROPSYCHIATRIC INSTITUTE AT UCLA IN ORDER TO
8 GIVE THE EXPERTISE THAT I HAVE DEVELOPED IN THE PRACTICAL FIELD
9 TO THOSE WHO ARE PROFESSIONALS WITHIN THE CONTEXT OF A CULT
10 CLINIC WHICH WAS RUN THROUGH THE TASK FORCE THAT I CHAIR.
11 THERE WERE MANY PSYCHIATRISTS, M.D.'S, PSYCHOLOGISTS, AND
12 SOCIAL WORKERS WHO CAME TO STUDY WITH MYSELF AND WITH OTHER
13 SOCIAL WORKERS WHO HAVE BEEN DEALING WITH THIS PHENOMENA LONG
14 BEFORE THE MENTAL HEALTH PROFESSIONS BECAME INVOLVED. SO THAT
15 IF YOU'RE WONDERING IF THERE IS ANY FORM OF DEGREE IN THIS IT
16 DOESN'T EXIST.

17 MR. KLEIN: NOT THAT THERE IS ANY FORM OF DEGREE. ARE
18 THERE ANY COURSES IN THAT AREA?

19 A. NOT TO MY KNOWLEDGE, NO.

20 MR. KLEIN: I HAVE NO FURTHER QUESTIONS AT THIS TIME ON
21 VOIR DIRE, YOUR HONOR.

22 THE COURT: PROCEED.

23 MR. LEVY: THANK YOU, YOUR HONOR.

24

25 DIRECT EXAMINATION (RESUMED)

26 BY MR. LEVY:

27 Q NOW, BACK TO THE SUBJECT AT HAND. WE WERE
28 TALKING ABOUT THE CHARACTERISTICS OF CULT ENTRAPMENT OR

1 RECRUITMENT AND I BELIEVE THE LAST THING YOU HAD TOLD US ABOUT
2 WAS PEOPLE SEEKING A SOURCE OF FULFILLMENT. WOULD YOU, PLEASE,
3 CONTINUE, SIR.

4 A. ONE OF THE THINGS THAT I HAD FOUND CHARACTERISTIC
5 OF PEOPLE INVOLVEMENT IN COERCIVE RELIGIOUS STYLE COMMUNITIES
6 WAS THAT — AND IT'S A COMMON THREAD THAT SEEMS TO RUN THROUGH
7 THESE ORGANIZATIONS — IS THAT THE ORGANIZATIONS MAKE A
8 TOTALISTIC CLAIM ON THE LIFE OF THE INDIVIDUAL ASSERTING THAT
9 THE UNMET NEEDS, BOTH SPIRITUAL AND EMOTIONAL, SOMETIMES EVEN
10 PHYSICAL, OF THE INDIVIDUAL ARE A CONSEQUENCE OF THE
11 INDIVIDUAL'S UNENLIGHTMENT AND THAT THE ORGANIZATION, ITS
12 TEACHINGS AND/OR PHILOSOPHY AND THEOLOGY WILL PROVIDE A
13 PANACEA, A TOTAL ANSWER AND RESOLUTION TO ALL OF THEIR
14 SPIRITUAL AND EMOTIONAL DIFFICULTIES IF THE INDIVIDUAL WILL
15 MAKE A TOTAL AND COMPLETE SURRENDER AND COMMITMENT TO THE
16 ORGANIZATION TURNING OVER, IN MY EXPERIENCE, USUALLY THE TOTAL
17 SPECTRUM OF THEIR LIFE TO THE ORGANIZATION THEY WILL THEN BE
18 SAVED.

19 I FIND THAT WHAT GOES ALONG WITH THAT IS A TOTAL
20 OBEISANCE, A TOTAL FOLLOWING OF THE ORDERS OF THOSE
21 ORGANIZATIONS EITHER BY A SINGLE INDIVIDUAL OR BY A SMALL GROUP
22 OF INDIVIDUALS WHO CLAIM TO HAVE THE TOTAL AND COMPLETE ACCESS
23 TO THE TRUTH; THOSE WHO DISAGREE ARE EITHER CONSIDERED TO BE
24 UNSAVED FAILURES AND ARE EITHER SEVERELY PUNISHED EMOTIONALLY
25 OR ARE REJECTED FROM THE ORGANIZATION AND CONSIDERED TO BE
26 DAMNED OR UNSAVED.

27 ANOTHER PHENOMENA I FIND IS THAT THESE
28 ORGANIZATIONS BECOME DEEPLY INVOLVED IN SOME BUSINESS PROCESS

1 IN WHICH EITHER THROUGH THE PURCHASE OF BUSINESS OR PROPERTY OR
2 FORMS OF RAISING FUNDS USUALLY THROUGH QUESTIONABLE MEANS THEY
3 EXPAND THE FINANCIAL BASE OF THEIR ORGANIZATIONS, THE PRACTICES
4 HAVING IN THE LAST NUMBER OF YEARS COME UNDER SEVERE QUESTION
5 BY BOTH THE IRS AND FEDERAL COURT SYSTEM. THERE SEEMS TO BE A
6 CONSISTENT BLURRING HERE OF SEPARATION OF CHURCH AND STATE AS
7 IT RELATES TO THE USE OF MONEY.

8 IN ADDITION, I FIND THAT ONE OF THE
9 CHARACTERISTICS IS THAT THE COERCIVE RELIGIOUS ORGANIZATION
10 VIEWS THE OUTSIDE WORLD AS AN ENEMY. THOSE WHO ARE NOT PART OF
11 THE GROUP ARE UNSAVED OR UNSAVORY AND THAT THE OUTSIDE WORLD
12 MUST BE TREATED WITH A GREAT SENSE OF MISTRUST; ONLY THOSE WHO
13 ARE THE INITIATED AND THE SAVED CAN TRULY BE SEEN AS HAVING ANY
14 ACCESS TO THE TRUTH; THEREFORE, THERE IS A GREAT PERMISSION TO
15 TREAT THE OUTSIDE WORLD AS IF IT WERE SOMEWHAT LESS THAN HUMAN,
16 TAKING ADVANTAGE OF PEOPLE'S NOT ONLY PHYSICAL MEANS BUT ALSO
17 EMOTIONAL WELL-BEING.

18 LAST OF ALL, WE TEND TO FIND THAT THESE KINDS OF
19 ORGANIZATIONS HAVE THEIR POWER CENTERED IN ONE PERSON, THAT
20 PERSON REPRESENTS THE EXPRESSION OF GOD DIRECTLY OR IS THE
21 DIRECT INTERMEDIARY BETWEEN GOD AND THE WORLD, THAT PERSON HAS
22 THE TOTAL AND COMPLETE ACCESS TO ANY AND ALL TRUTH; WHATEVER
23 PRONOUNCEMENTS THAT PERSON MAKES ARE TOTAL AND COMPLETE AND
24 EACH INDIVIDUAL IN THE ORGANIZATION MUST FOLLOW IT.

25 WHAT I FIND INTERESTING IS THAT IN RELIGIONS IN
26 WHICH THERE IS AN INTENSE HIERARCHY THOSE WHO ARE AT THE TOP OF
27 THE HIERARCHY ACCEDE TO THE SAME PRINCIPLE OF BEHAVIOR AS THE
28 FOLLOWERS. IN ALMOST ALL CULT STYLE SETTINGS THAT I HAVE SEEN,

1 THE LEADER OF THE ORGANIZATION IS NOT CULPABLE FOR THE SAME
2 SYSTEM OF BEHAVIOR AS THE FOLLOWERS. AND THAT'S USUALLY
3 JUSTIFIED BY THE STATEMENT THAT SINCE THAT PERSON IS THE
4 ENLIGHTENED ONE, THE MASTER, THE REPRESENTATIVE OF GOD THAT ANY
5 AND ALL CONSTRAINTS ON THEIR BEHAVIOR NO LONGER APPLIES SINCE
6 THEY HAVE TRANSCENDED ANY OF THOSE LIMITATIONS.

7 Q WOULD I BE -- AFTER HEARING THAT LIST OF
8 CHARACTERISTICS, COULD YOU DESCRIBE THE STRENGTH OF THE FEELING
9 OF A PERSON WHO FOLLOWS A CHARISMATIC LEADER OF THE SORT THAT
10 YOU HAVE DESCRIBED. IS THERE ANY WAY THAT YOU CAN EXPLAIN TO
11 THE COURT WHAT KIND OF BOND MIGHT EXIST BETWEEN THE LEADER OF
12 ONE OF THOSE NEW WAIVE RELIGIONS AND THE AVERAGE FOLLOWER.

13 MR. KLEIN: OBJECTION AS TO FOUNDATION, YOUR HONOR.

14 THE COURT: OVERRULED.

15 Q BY MR. LEVY: YOU MAY ANSWER.

16 A. THE GENERAL PATTERN SEEMS TO BE THAT THE
17 INDIVIDUAL TENDS TO BECOME ABJECT IN THE PRESENCE OF THE CULT
18 LEADER. BY THAT I MEAN HE -- THE INDIVIDUAL GIVES UP HIS OR
19 HER AUTONOMY, THEY SURRENDER ALL CAPACITY FOR FREE CHOICE AND
20 FOR FREE ACTION TO THE ORDERS OF THE LEADER OF THE
21 ORGANIZATION. ANY EXPRESSION OF DISSENT OR ANY ACT OF CHOICE
22 NOT VALIDATED OR AUTHENTICATED BY THE LEADER OF THE
23 ORGANIZATION IS SEEN AS SINFUL, AS ARROGANT, OR AS AN
24 EXPRESSION THAT THE INDIVIDUAL HAS NOT BEEN SAVED. SO THAT
25 TOTAL OBEDIENCE WITHOUT QUESTION IS THE HALLMARK OF ONE'S
26 FAITH.

27 WITHIN THAT CONTEXT WE SEE THAT PEOPLE'S
28 SELF-ESTEEM, THEIR SENSE OF THEMSELVES AS HUMAN BEINGS GOES WAY

1 WAY DOWN. PEOPLE FEEL POWERLESS TO AFFECT THEIR OWN LIVES AND
2 DEPEND UPON THE LEADER OF THE RELIGIOUS ORGANIZATION TO DIRECT
3 AND CONTROL THEIR LIVES. ANY EXPRESSION OF PERSONAL NEED OR OF
4 PERSONAL IDENTITY WHICH SEEMS TO BE SOMEWHAT COUNTERED IN ANY
5 WAY AT ALL TO WHAT THE RELIGIOUS ORGANIZATION EXPRESS IS, IS
6 VIEWED AS PROOF THAT THAT PERSON HAS NOT REALLY BECOME
7 ENLIGHTENED OR NOT SAVED. SO EVEN AT THE NORMAL PROCESS OF
8 THINKING AND QUESTIONING BECOMES A CONSISTENT REMINDER TO THE
9 FOLLOWER THAT THE PERSON IS NOT AS GOOD AS THE MASTER AND,
10 THEREFORE, MUST WORK HARDER AND HARDER TO ACHIEVE A LEVEL OF
11 ENLIGHTMENT CLOSE TO THAT OF THE MASTER.

12 ANOTHER COMMON CHARACTERISTIC IS THAT THE
13 INDIVIDUAL WILL TOTALLY REJECT ALL PAST LIFESTYLE RELATIONSHIP,
14 THE FAMILY, CAREER OR SCHOOL LIVING ENVIRONMENT, ET CETERA.
15 FREQUENTLY, THAT ACCOMPANIES A CHANGE OF NAME, IT ACCOMPANIES A
16 FORMAL PROCESS OF REJECTION OF THE FAMILY EITHER DIRECTLY OR
17 THROUGH SOME MEANS OF RELIGIOUS CONFESSION. IT IS ACCOMPANIED
18 BY A RELIGIOUS CONFESSION ITSELF IN WHICH THE INDIVIDUAL
19 TOTALLY BEARS HIS OR HER SOUL TO THE LEADER OF THE
20 ORGANIZATION.

21 THERE MUST BE NO SECRETS WITHIN THIS KIND OF
22 RELATIONSHIP AND THAT THE INDIVIDUAL ULTIMATELY FINDS THAT ANY
23 AND ALL POSSESSION THEY HAVE, WHETHER IT BE PHYSICAL OR
24 SPIRITUAL, NO LONGER BELONGS TO THEM. IN A SENSE THE ULTIMATE
25 SACRIFICE WHICH BRINGS THEM SOME HOPE OF SALVATION IS TO GIVE
26 THEMSELVES TOTALLY WITHOUT RESERVATION.

27 THE RESULT OF THAT IS THAT WHAT WE WOULD SEE AS
28 THE NORMAL PROFILE OF A PERSON, THEIR PERSONALITY TENDS TO BE

1 SUPPRESSED, CONTROLLED, AND MANIPULATED. MY EXPERIENCE WITH
2 PEOPLE WHO ARE IN THESE ORGANIZATIONS AND WHO HAVE COME OUT IS
3 THAT THEIR PERSONALITIES HAVE BEEN SO SUPPRESSED FOR SUCH AN
4 EXTENDED PERIOD OF TIME THAT EVEN THEIR FAMILY MEMBERS DO NOT
5 RECOGNIZE THEM.

6 AS I HAVE BEEN TAUGHT BY A NUMBER OF PROFESSIONAL
7 RESEARCHERS WHO OVER THE LAST NUMBER OF YEARS HAVE WORKED IN
8 THE PERSONALITY IMPACT OF THESE ORGANIZATIONS AND MY OWN
9 PERSONAL EXPERIENCE IS THAT THE PERSONALITY GROWS AND DEVELOPS
10 THROUGHOUT ITS LIFE, IT NEVER CHANGES. WHAT HAPPENS IN THE
11 COERCIVE RELIGIOUS SETTING IS THAT THE PERSONALITY IS STRIPPED
12 DOWN AND THE IDENTITY OF THE RELIGIOUS ORGANIZATION IS LAID
13 OVER THE TOP SO THAT ANY NORMAL PROCESS OF PERSONAL GROWTH
14 WHICH WOULD TAKE PLACE IN WHATEVER PERIOD OF TIME, IN SOME
15 CASES YEARS, NEVER TAKES PLACE. SO THAT PERSONAL GROWTH IS
16 STUNTED.

17 FOR EXAMPLE, YOUNG ADULTS IN PARTICULAR WHO HAVE
18 BEEN IN THESE GROUPS FOR ANYWHERE FROM FIVE TO TEN YEARS HAVE
19 LITERALLY LOST FIVE TO TEN YEARS OF GROWTH OUT OF THEIR LIFE
20 AND REHABILITATION INCLUDES A PROCESS OF LEARNING WHAT IT IS
21 THEY NEVER LEARNED IN THOSE PERIODS IN THE CULT, HOW TO RELATE
22 TO OTHER PEOPLE, HOW TO DEVELOP MORE MATURE ATTITUDES AS THE
23 YEARS PASS. THE CONSEQUENCE OF THIS PROCESS IS THAT PEOPLE
24 BECOME TOTALLY DISORIENTED. ONE OF THE MOST COMMON EMOTIONAL
25 ASPECTS IS A STATE OF CONFUSION, COGNITIVE DISSIDENCE, IT'S
26 LIKE TELLING SOMEBODY TO COME HERE AND THEN GESTURE FOR THEM TO
27 GO AWAY, IT'S CALLED A DOUBLE BIND OR HANDING SOMEBODY
28 SOMETHING, WHEN THEY REACH FOR IT TAKING IT AWAY, SAYING TO

1 THEM YOU REALLY DON'T DESERVE THIS YET. AND MY EXPERIENCE WITH
2 PEOPLE IN THESE ORGANIZATIONS IS THAT THEY'RE SO DISORIENTED OR
3 SO DISSIDENT IN THEIR LIVES THAT THEY MUST RELY ON SOME
4 EXTERNAL SOURCE OF TRUTH TO GIVE THEM THE PERMISSION TO
5 FUNCTION AS HUMAN BEINGS.

6 Q. IS THE DEPENDENCY RELATIONSHIP ESTABLISHED BETWEEN
7 THE FOLLOWER AND THE LEADER OF THE ORGANIZATION?

8 A. I WOULD SAY WITHOUT QUESTION. LET ME CHARACTERIZE
9 THE DEPENDENCY RELATIONSHIP. I THINK THERE IS A WAY TO
10 UNDERSTAND IT SIMPLY THOUGH IT IS COMPLEX, I THINK, EMOTIONALLY
11 AND SPIRITUALLY. WHEN I'M ASKED TO TEACH ABOUT THIS, I USE THE
12 MODEL OF ADDICTION. I SEE INVOLVEMENT IN THESE ORGANIZATIONS
13 AS THE ULTIMATE OF ADDICTIVE BEHAVIOR.

14 IN MY PAST AS COUNSELOR, I HAVE WORKED WITH A LOT
15 OF DRUG ADDICTS AND ALCOHOLICS AND I FIND SIMILAR PROFILES.
16 THE INDIVIDUAL UNABLE TO, FOR WHATEVER REASON, TRULY FIND
17 COHERENCE AND CONTROL OF THEIR OWN LIVES HAVE THE TEACHING OF
18 THE ORGANIZATION BECOME A SUBSTITUTE CONTROL SYSTEM AS A DRUG
19 OR ALCOHOL BECOME THE MEANS THAT CONTROLS A PERSON'S LIFE THAT
20 DULLS THE PAIN, THE QUESTIONING OR THE GROWTH THAT TAKES PLACE
21 SO THE KIND OF ROUTINIZED BEHAVIOR WHETHER IT BE CHANTING OR
22 MEDITATING OR STUDYING OR GROUP ACTIVITIES WHICH BECOMES
23 ROUTINIZED AND MESMERIZING OVER A PERIOD OF TIME CREATES A
24 GREAT DEPENDENCY.

25 ONE OF THE MOST TELLING COMMENTS I EVER RECEIVED
26 WAS FROM A YOUNG MAN WHO CAME OUT OF A GROUP WHO SAID TO ME
27 LEAVING THIS GROUP WAS LIKE PULLING OUT MY OWN UMBILICAL CORD,
28 I THOUGHT I WAS GOING TO DIE. IT TOOK A LONG TIME FOR ME TO

1 GIVE BIRTH TO MYSELF.

2 THAT DEPENDENCY IS SO PROFOUND THAT IN MY
3 EXPERIENCE IN WORKING WITH THESE PEOPLE IT TAKES ANYWHERE FROM
4 12 TO 150 MONTHS OF REHABILITATION, COUNSELING AND LIVING IN
5 THE WORLD FOR PEOPLE TO ARRIVE BACK AT SOME NORMAL SENSE OF
6 FUNCTIONING. THE KIND OF COUNSELING THAT IT TAKES IS SIMILAR
7 TO THE KIND OF REHABILITATIVE WORK THAT ONE WOULD DO WITH
8 ADDICTS. SO THAT THE DEPENDENCY RELATIONSHIP IN A SENSE IS
9 THAT THE RELIGIOUS ORGANIZATION PROVIDES THE FIX AND THE
10 INDIVIDUAL NEEDS THE FIX CONSISTENTLY IN ORDER TO SUSTAIN
11 ITSELF. THE DIFFERENCE HERE IS THAT THE FIX CAN BE PROVIDED
12 SPIRITUALLY AND EMOTIONALLY, YOU DON'T NEED A SPECIFIC LIKE A
13 DRUG OR ALCOHOL IN ORDER TO SUSTAIN IT. THE HUMAN MIND CAN BE
14 SO MANIPULATED AND AFFECTED THAT IT CAN BE DONE, IN FACT, QUITE
15 SIMPLY.

16 Q. HAVE YOU HAD THE OPPORTUNITY TO MEET AND TO CONFER
17 WITH GREGORY MULL?

18 A. YES, I HAVE.

19 Q. HAVE YOU HAD THE OPPORTUNITY TO READ MR. MULL'S
20 TESTIMONY SO FAR AT THIS TRIAL?

21 A. YES, I HAVE.

22 Q. HAVE YOU HAD THE OPPORTUNITY TO READ AND STUDY THE
23 CONTENTS OF THE TRANSCRIPT OF THE TWO AND A HALF HOUR
24 CONFERENCE THAT WAS HELD BETWEEN GREGORY MULL, ELIZABETH CLARE
25 PROPHET, MR. EDWARD FRANCIS HERE AND MONROE SHEARER?

26 A. YES, I HAVE.

27 Q. HAVE YOU COME TO ANY CONCLUSIONS AS TO WHETHER OR
28 NOT GREGORY MULL WAS VULNERABLE TO CHURCH UNIVERSAL &

1 TRIUMPHANT AND THEIR PROGRAM OF INDOCTRINATION?

2 A. YES, I HAVE.

3 Q. WOULD YOU PLEASE SHARE THOSE WITH US.

4 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO A LACK OF
5 FOUNDATION AND EXPERTISE ON THE PART OF THIS WITNESS.

6 THE COURT: OVERRULED.

7 Q BY MR. LEVY: YOU MAY ANSWER.

8 THE COURT: WELL, YOU MIGHT ASK ONE OR TWO FOUNDATIONAL
9 QUESTIONS BEFORE YOU PROCEED.

10 Q BY MR. LEVY: DID YOU HAVE PERSONAL SETTINGS WITH
11 MR. MULL?

12 A. YES, I DID.

13 Q. HAVE YOU KNOWN HIM OVER A PERIOD OF YEARS?

14 A. YES, I HAVE.

15 Q. HAS HE SHARED WITH YOU EXTENSIVELY HIS INVOLVEMENT
16 WITH CHURCH UNIVERSAL & TRIUMPHANT?

17 A. YES, HE HAS.

18 Q. IN THE COURSE OF THIS KNOWING AND SHARING, HAVE
19 YOU COME TO CONCLUSIONS WITH REGARD TO HIS INVOLVEMENT WITH
20 THAT CHURCH AND ITS INDOCTRINATION PROCESS?

21 A. YES, I HAVE.

22 Q WOULD YOU EXPLAIN TO US WHATEVER CONCLUSIONS YOU
23 MAY HAVE DRAWN FROM THE YEARS OF SHARING WITH GREGORY MULL AND
24 THE STUDY YOU HAVE DONE OF THIS ORGANIZATION.

25 MR. KLEIN: YOUR HONOR, I WOULD AGAIN OBJECT AS TO A
26 LACK OF FOUNDATION.

27 THE COURT: APPROACH THE BENCH, PLEASE.

28 /

1 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE
2 BENCH OUT OF THE HEARING OF THE JURY.)

3 THE COURT: AS TO WHAT?

4 MR. KLEIN: I BELIEVE HE IS TESTIFYING AS A
5 PSYCHIATRIST, A PSYCHOLOGIST, A SOCIOLOGIST. I BELIEVE THAT'S
6 THE NATURE OF THE TESTIMONY AND HE DOESN'T HAVE THAT EXPERTISE.
7 I DON'T SEE HOW — I THINK HE CAN DESCRIBE CONCLUSIONS HE'S
8 REACHED AS FAR AS WHAT — WHEN HE INTERVIEWED PEOPLE WHAT THEY
9 TOLD HIM. NOW HE'S GOING TO TALK ABOUT THE AFFECT THESE
10 CHURCHES HAD ON THIS MAN; I DON'T THINK HE HAS THE EXPERTISE TO
11 TESTIFY TO THAT.

12 MR. LEVY: I BELIEVE HE DOES HAVE THE EXPERTISE. HE HAS
13 TESTIFIED TO 20 YEARS OF STUDY AND PARTICIPATION. WHAT DOES IT
14 TAKE 21 YEARS?

15 THE COURT: HE'S BEEN AT IT A LOT OF YEARS. THE
16 OBJECTIONS OVERRULED.

17 MR. KLEIN: IN ORDER NOT TO INTERRUPT, IN ORDER NOT TO
18 HAVE TO CONTINUE TO INTERRUPT, CAN I HAVE A CONTINUING
19 OBJECTION TO HIM GIVING OPINIONS SUCH AS MR. LEVY HAS JUST
20 ASKED HIM ABOUT, THE AFFECT THE ORGANIZATION HAD ON MR. MULL
21 AND WHETHER HE WAS MANIPULATED AND THINGS LIKE THAT AS FAR AS
22 HIS OPINION AND TESTIMONY.

23 THE COURT: YOU CANNOT HAVE A — JUST A GENERAL
24 CATCHALL.

25 MR. KLEIN: OKAY.

26 THE COURT: IF YOU WANT TO DESCRIBE THE PARAMETERS THEN
27 I THINK IT WOULD BE A GOOD IDEA.

28 MR. KLEIN: OKAY. BECAUSE I DON'T WANT TO CONTINUE.

1 THE COURT: WHAT ARE THE PARAMETERS?

2 MR. KLEIN: THE PARAMETERS ARE TO THE EXTENT HE GIVES
3 TESTIMONY AS TO CONCLUSIONS OR OPINIONS THAT HE HAS AS FAR AS
4 THE AFFECT OF ANY OF THE CHURCH ON MR. MULL'S EMOTIONS, HIS
5 MENTAL OUTLOOK.

6 THE COURT: ON THE BASIS OF THE GROUNDS YOU MENTIONED
7 JUST A FEW MOMENTS AGO?

8 MR. KLEIN: YES, YOUR HONOR.

9 THE COURT: OKAY. AS TO THAT, YOU CAN HAVE A CONTINUING
10 OBJECTION.

11 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT.)

12 THE COURT: PLEASE PROCEED.

13 MR. LEVY: THANK YOU, YOUR HONOR.

14 Q. I WILL REPEAT THE QUESTION. HAVE YOU COME TO ANY
15 CONCLUSIONS AS TO WHETHER OR NOT GREGORY MULL WAS VULNERABLE TO
16 CHURCH UNIVERSAL & TRIUMPHANT AND ITS INDOCTRINATION PROGRAM?

17 A. YES, I HAVE.

18 Q. WOULD YOU EXPLAIN TO US AND SHARE WITH US YOUR
19 CONCLUSIONS.

20 A. THE EXTENSIVE PERIOD OF TIME THAT I SPENT WITH
21 MR. MULL LED ME TO UNDERSTAND AN INDIVIDUAL WHO I THINK AT THE
22 VERY CORE OF HIS SENSE OF PERSONESS AND HIS SPIRITUALITY IS AN
23 INNOCENT -- A MAN WHO HAS DEEP AND PROFOUND SPIRITUAL AND
24 RELIGIOUS NEEDS WHO HAS THROUGH MOST OF HIS LIFE BEEN SEARCHING
25 FOR AN ACCESS TO THE DIVINE AND A SENSE OF RELATIONSHIP WHICH
26 WOULD BRING HIM THE KIND OF PEACE AND SERENITY WHICH ALL OF US
27 SEEK. AT THE SAME TIME, I THINK THOSE UNMET NEEDS WHICH HE'S
28 BEEN SEEKING TO FILL MOST OF HIS LIFE CREATED A SENSE OF

1 SPIRITUAL AND EMOTIONAL NAIVETE TO THE STRENGTH OF THE
2 ADVANCEMENTS BY CHURCH UNIVERSAL & TRIUMPHANT.

3 MY FEELING ABOUT MR. MULL IS THAT HE RESPONDS
4 IMMEDIATELY TO ANYBODY WHO TREATS HIM WITH A SENSE OF
5 FRIENDSHIP, AN OPEN HAND, A WELCOME AND MORE IMPORTANTLY A
6 SENSE OF INCLUSIVENESS. CERTAINLY IN MY EXPERIENCE WITH HIM HE
7 IS THE KIND OF HUMAN BEING WHO RESPONDS TO AN OFFER OF
8 FRIENDSHIP WITH AN IMMEDIATE RETURN OF SAME. HE IS A MAN
9 CAPABLE OF A GREAT SENSE OF PERSONAL DEDICATION TO OTHER HUMAN
10 BEINGS WHO TREAT HIM IN A KIND AND LOVING MANNER AND AT THE
11 SAME TIME IS CAPABLE OF GIVING BACK A GREAT SENSE OF
12 DEDICATION. I THINK THAT THAT'S A CONSEQUENCE OF HIS SPIRITUAL
13 SEARCH AND HIS NEED TO FIND SOME TRUTH AND PEACE IN HIS LIFE.

14 IN THAT SENSE HE'S SIMILAR TO MANY OF THE OTHER
15 PEOPLE I HAVE SPOKEN TO WHO HAVE BECOME VICTIMS OF SIMILAR
16 ORGANIZATIONS. IN MY DISCUSSION WITH MR. MULL HE WAS IN THE
17 PROCESS OF ONE OF THOSE SEARCHING THROUGH A STUDY GROUP HE WAS
18 DOING AT HIS OWN HOME WHEN HE WAS APPROACHED BY CHURCH
19 UNIVERSAL & TRIUMPHANT. IT WAS WITHIN THAT PROCESS THAT THE
20 INTENSITY OF THE APPROACH MADE HIM FEEL THAT MAYBE THIS WAS A
21 PLACE THAT COULD OFFER HIM SOME TRUTH IN GUIDANCE.

22 IT IS CLEAR THAT IT WAS THE PERSONAL ATTENTION
23 PAID TO HIM BY THE LEADERS OF CHURCH UNIVERSAL & TRIUMPHANT, BY
24 ELIZABETH CLARE PROPHET HERSELF WHICH GAVE HIM AN ENORMOUS
25 SENSE OF AN EGO BOOST, A SENSE THAT GOD WAS SOMEHOW TRYING TO
26 SPEAK TO HIM AND TO GUIDE HIM AND I THINK HE FOUND HIMSELF VERY
27 VULNERABLE TO THAT KIND OF LOVING INTAKE. WITHIN THAT PROCESS
28 HIS WILLINGNESS TO SURRENDER TO THE DIVINE EXPERIENCE REALLY

1 BECAME FOCUSED, NOT IN HIS OWN PERSONAL SPIRITUAL ODDITY BUT
2 RATHER IN BECOMING DEPENDENT UPON THE SPIRITUALITY AND THE
3 RELIGIOUS CODES ESTABLISHED BY THE CHURCH THEMSELVES AND IS
4 LAID DOWN BY ELIZABETH CLARE PROPHET.

5 HE BEGAN TO FOCUS ALL OF HIS SENSE OF IDENTITY,
6 HIS RELIGIOUS NEEDING AND LONGING INTO HER PERSONALITY AND INTO
7 THE ACTIVITY OF THE CHURCH ITSELF, INTO DECREERING, INTO
8 STUDYING AND THEN INTO THE ARCHITECTURAL WORK WHICH THE CHURCH
9 REQUESTED OF HIM. HE WAS AT A STAGE IN HIS LIFE IN WHICH HE
10 WAS EXPERIENCING SOME LONELINESS AND IN WHICH HE NEEDED TO FIND
11 A SENSE OF PURPOSE AND HOME. I THINK IT WAS WITHIN THAT
12 CONTEXT THAT THE INTENSITY OF THE CHURCH'S TEACHING, ITS
13 REQUEST AND EVENTUAL DEMANDS OF HIM CREATED SUCH AN EXTREME
14 SENSE OF BONDING.

15 ALSO MY EXPERIENCE WITH MR. MULL IS THAT THOUGH
16 HE'S A MAN WITH STRONG BELIEFS HE'S NOT WHAT I WOULD CALL A
17 STRONGLY ASSERTIVE PERSON AND WOULD TEND UNDER THE PRESENCE OF
18 A STRONG CHARISMATIC PERSONALITY TO BECOME MORE PASSIVE.

19 THE EXPERIENCE OF LONG PERIODS OF DECREERING, THE
20 CONSISTENT REPETITIVE EXPERIENCE OF CHANTING, THE LONG HOURS OF
21 WORK AND OF STUDY, LITTLE SLEEP, ESPECIALLY FOR A MAN HIS AGE,
22 INADEQUATE DIET, INADEQUATE EXERCISE AND A SENSE OF
23 CONFINEMENT, INABILITY TO SIMPLY GO OUT AND SEE THE REST OF THE
24 WORLD HAD A PROFOUND AFFECT IN WEAKENING HIS SENSE OF REALITY;
25 IN ADDITION HE BROKE MOST OF HIS PRIOR RELATIONSHIPS WITH
26 PEOPLE IN HIS LIFE; SO, CONSEQUENTLY, HE WAS CUT ADRIFT IN THE
27 MIDDLE OF THIS NEW ENVIRONMENT WITH ALL OF THESE PEOPLE
28 PRESSURING HIM CONSISTENTLY AND BECAME, I BELIEVE, DISORIENTED.

1 AT THAT POINT YOU SIMPLY HAVE TO GRAB ON TO THE GREATEST
2 REALITY THAT PRESENTS ITSELF AND THAT WAS THE CHURCH.

3 WHAT I THINK HAPPENED IS THAT THE CONTINUED
4 PRESSURE FOR HIM TO BECOME A FULL MEMBER TO LIVE AT CAMELOT, ET
5 CETERA, SIMPLY BEGAN TO BREAK DOWN ONE LEVEL OF DEFENSE AND
6 PERSONAL BOUNDARY AFTER ANOTHER UNTIL HE FINALLY ACCEDED TO, AS
7 I UNDERSTAND, ALMOST ALL OF THEIR DEMANDS.

8 Q. IN THE COURSE OF YOUR COMMUNICATION WITH GREGORY
9 MULL, DID HE DISCUSS WITH YOU HIS CONFESSION LETTER?

10 A. YES, HE DID.

11 Q. IN YOUR STUDY OF CULTIC PRACTICES, HAVE YOU AND
12 OTHERS WHO ARE EXPERTS IN THE FIELD DETERMINED WHAT THE USE OF
13 CONFESSION IS REALLY ABOUT?

14 A. YES. LET ME ANSWER THAT IN A TWO-PART WAY. FIRST
15 OF ALL ALL RELIGIONS, THOSE THAT WE MIGHT CONSIDER BONA FIDE OR
16 MAINLINE AND THOSE THAT WE MIGHT HAVE QUESTIONS ABOUT, ALL HAVE
17 SOME FORM OF CONFESSION WHETHER IT'S PERSONAL CONFESSION TO GOD
18 OR WHETHER IT IS A CONFESSION TO AN INTERMEDIARY OR WHETHER IT
19 TAKES PLACE COMMUNALLY, WHETHER IT TAKES PLACE THROUGH PRAYER
20 OR THROUGH CHANTING OR THROUGH DANCING, WHATEVER, SO IT'S A
21 COMMON FEATURE OF RELIGIOUS PRACTICE IN EVERY RELIGIOUS
22 CULTURE. HOWEVER, IN THOSE SITUATIONS CONFESSION IS A MATTER
23 OF CLEANSING IN WHICH ONCE THE CONFESSION IS MADE SOME FORM OF
24 CLEANSING, ABSOLUTION AND RELIEF FROM GUILT AND ANXIETY IS
25 ACHIEVED EITHER BECAUSE THE INDIVIDUAL FEELS IT BECAUSE THEY
26 ARE TOLD THAT GOD HAS CLEANSED THEM AND/OR MORE IMPORTANTLY
27 BECAUSE THEY'RE REQUIRED TO DO SOMETHING IN ORDER TO ACCOMPLISH
28 IT, MAYBE SOME FORM OF PENANCE.

1 IN THE CASE OF THE CONFESSION LETTER PROCESS IN
2 CHURCH UNIVERSAL & TRIUMPHANT AND SIMILAR KINDS OF PROCESSES IN
3 OTHER ORGANIZATIONS WE FIND IS THAT THE CONFESSIONAL ITSELF
4 BECOMES A SERIES OF INFORMATION, PIECES USED BY THE
5 ORGANIZATION TO CONSISTENTLY REMIND THE INDIVIDUAL THAT THEY'RE
6 NOT SAVED. SO THAT INSTEAD OF CONFESSION WHICH LEADS TO
7 ABSOLUTION OR CLEANSING IT IS CONFESSION WHICH USUALLY LEADS TO
8 AN INCREASED SENSE OF IMPRISONMENT AND LACK OF POSITIVE
9 IDENTITY. IT CERTAINLY LEADS TO A SENSE OF GREAT SPIRITUAL
10 DEPRIVATION.

11 ON A MORE CYNICAL SIDE, WHAT WE HAVE FOUND IS THAT
12 UNLIKE OTHER RELIGIONS COERCIVE RELIGIOUS ORGANIZATIONS RETAIN
13 THE INFORMATION OF CONFESSIONS, WHETHER THEY'RE IN LETTERS OR
14 TAPES OR THE INDIVIDUAL MEMORIES OF THOSE TO WHOM THE
15 CONFESSION WAS GIVEN AND PERIODICALLY THOSE WHO CONFESSED ARE
16 REMINDED OF IT. WHAT I FIND MOST FASCINATING IN THIS CASE, AND
17 IT APPEARS IN OTHER SUCH GROUPS, IS THAT THOSE WHO CONFESS ARE
18 TOLD THAT THEIR CONFESSION AND THE INFORMATION CONTAINED WOULD
19 BE DESTROYED, THAT ONCE IT WAS SAID IT WAS TO BE FORGOTTEN, IT
20 ONLY RESIDED IN THE MIND OF GOD, AS IT WERE.

21 THE FACT THAT THIS INFORMATION IS RETAINED
22 PARTICULARLY IN A WRITTEN FORM AND FILED AND THEN REUSED AGAIN
23 FOR ME IS THE HEIGHT OF THE MANIPULATION OF PEOPLE'S SPIRITUAL
24 AND HUMAN NEEDS. IT CONSISTENTLY MAKES IT IMPOSSIBLE FOR THE
25 BELIEVER TO EVER TRULY BE CLEANSED. IT'S LIKE YOU KEEP
26 SLAPPING HIM IN THE FACE AGAIN AND AGAIN AND AGAIN WITH THE
27 THINGS THAT HE'S ALREADY TRIED TO LEAVE BEHIND IN HIS LIFE.

28 Q. AFTER CONSULTING WITH MR. MULL, DID YOU HAVE ANY

1 CONCLUSIONS AS TO HOW HE AND OTHER EX-CULT MEMBERS CAN SEEK AND
2 APPLY REHABILITATION PROCESSES TO THEMSELVES?

3 A. IT'S VERY DIFFICULT. THE REHABILITATION PROCESS
4 IS VERY CONFUSED —

5 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THIS QUESTION
6 AS A LACK OF FOUNDATION.

7 THE COURT: AS WHAT?

8 MR. KLEIN: AS HAVING — THE WITNESS HAVING A LACK OF
9 FOUNDATION BEING LAID FOR HIM TO ANSWER THIS QUESTION.

10 THE COURT: OVERRULE.

11 YOU CAN ANSWER.

12 Q BY MR. LEVY: YOU MAY ANSWER.

13 A. REHABILITATION PROCESS IN GENERAL IS A COMPLICATED
14 REALITY THAT INVOLVES A NUMBER OF FUNDAMENTAL ISSUES. FIRST OF
15 ALL PEOPLE WHO HAVE BEEN IN AN ORGANIZATION FOR A YEAR HAVE SO
16 LOST SENSE WITH WHAT WE WOULD CONSIDER TO BE THE NORMAL
17 PROCESSES OF REALITY THAT THERE ARE A NUMBER OF SIGNIFICANT
18 THINGS THAT HAPPEN TO THEM. ONE, AND MOST FAMILIAR, IS THE
19 PHENOMENA THAT WE CONVENTIONALLY CALL FLOATING. THAT HAPPENS
20 IN WHICH A MEMBER WHO'S LEFT A SIMILAR ORGANIZATION MAY BE
21 GOING THROUGH THE NORMAL DAILY ROUTINE AND EITHER A PIECE OF
22 MUSIC, A CONVERSATION, AN EXPERIENCE, SOMETHING WILL SET OFF
23 THE EXPERIENCE IN THE CULT.

24 LET ME ANALOGIZE IT TO A NUMBER OF YEARS AGO WHEN
25 PEOPLE WERE USING HALLUCINOGENIC DRUGS AND THEY WOULD STOP
26 USING THEM AND AS LATE AS A YEAR OR TWO YEARS LATER THE
27 PSYCHOPHARMACOLOGY IN THE STRUCTURE OF THE BRAIN WOULD
28 REACTIVATE AN HALLUCINATORY EXPERIENCE. IN THE CASE OF CULTS

1 WHAT DOES IT EVEN MOST INTENSELY IS IF THEY SEE, HEAR OR SPEAK
2 TO PEOPLE WHO ARE MEMBERS OF THE CULT, PARTICULARLY IF THE
3 ORGANIZATION CONTINUES TO BADGER THEM OR ATTEMPT TO GET THEM
4 BACK OR ATTEMPTS TO THREATEN AND COERCE THEM THEN THE TEACHINGS
5 ARE CONSISTENTLY REINFORCED BUT IN THIS SENSE IN A VERY
6 NEGATIVE WAY AND THE INDIVIDUAL CAN PERIODICALLY AND SOMETIMES
7 FREQUENTLY SNAP BACK. THAT IS AN ENORMOUSLY FRIGHTENING
8 EXPERIENCE BECAUSE IN THIS CASE IT IS SOMETIMES VIEWED BY THE
9 EX-CULT MEMBER AS AN ACT OF PUNISHMENT.

10 THE OTHER PHENOMENA IS THAT WHAT FLOATING DOES IS
11 THAT IT SOMEHOW CHALLENGES THE INDIVIDUAL AS TO WHETHER OR NOT
12 THEY EVER REALLY LEFT AND, THEREFORE, A PERSON FEELS VERY
13 FRIGHTENED ABOUT THEIR OWN PERSONAL AUTONOMY AND THEIR OWN
14 CAPACITY FOR PERSONAL FREEDOM.

15 NEXT OF ALL AN INDIVIDUAL WHO COMES OUT OF THIS
16 ORGANIZATION HAS NO LIFE TO GO TO. THEY HAVE LEFT ALL OF THE
17 NORMAL PARAMETERS OF LIVING AND ARE CONFRONTED WITH THE REALITY
18 OF HAVING TO REBUILD A LIFE, WORK, SOME KIND OF FAMILY, A SENSE
19 OF FRIENDS AND A PLACE TO BE. SINCE ALL OF THEIR NEEDS FROM
20 FOOD TO CLOTHING TO WHEN TO GET UP AND WHEN TO GO TO BED WERE
21 TAKEN CARE OF BY THESE TOTALISTIC COMMUNITIES, THEY STRUGGLE
22 WITH A WAY OF REDEFINING THE PARAMETERS OF THEIR LIVES. AND
23 SINCE PARTICULARLY IN THE CASE OF MR. MULL HE HAD NOT BEEN
24 DOING THAT FOR A NUMBER OF YEARS, ESPECIALLY FOR A MAN OF HIS
25 AGE AND HIS HEALTH, IT WAS A PARTICULARLY TRAUMATIC EXPERIENCE.

26 ANOTHER PHENOMENA THAT RESULTS AS A REHABILITATION
27 IS AN ENORMOUS SENSE OF SELF-DOUBT. THE INDIVIDUAL SENSES THEY
28 HAVE SEEN THEMSELVES PARTICIPATING IN THEIR OWN VICTIMIZATION,

1 CONSISTENTLY DOUBT THEMSELVES AND THEIR CAPACITY TO JUDGE
2 WHETHER PEOPLE WHO COME TO THEM ARE HONEST OR CARING AND
3 MISTRUST THEIR OWN JUDGMENT CAPACITIES, WHICH MAKES IT HARD FOR
4 THEM TO BEGIN TO REBUILD THEIR LIFE AND REDESIGN THEIR OWN
5 SENSE OF SELF AND CERTAINLY THEY BECOME MISTRUSTFUL OF THOSE
6 WHO REACH OUT A HELPING HAND TO HELP THEM BECAUSE THAT'S WHAT
7 GOT THEM IN THIS SITUATION IN THE FIRST PLACE.

8 WHAT WE TRY AND DO WITH PEOPLE WHO NEED TO BE
9 REHABILITATED IS TO GIVE THEM A LOVING, CARING ENVIRONMENT,
10 SUPPORT FROM PEOPLE WHO HAVE BEEN IN SIMILAR KINDS OF GROUPS SO
11 THAT A PEER STRUCTURE CAN BE PROVIDED TO GIVE SUPPORT, TO
12 PROVIDE EXPERT EMOTIONAL AND RELIGIOUS COUNSELING SO PEOPLE CAN
13 ATTEMPT TO ASK THE QUESTIONS THAT THEY WERE NEVER PERMITTED TO
14 ASK IN THE CONTEXT OF THE CULT. WE TRY AND FIND THEM SOME
15 MEANS OF EMPLOYMENT SO THAT THEY BEGIN TO RESTRUCTURE THE
16 NORMAL OUTLINES OF THEIR LIFE AND WE WILL AT TIMES EVEN GO BACK
17 TO THEIR FAMILY MEMBERS AND SEE IF WE CAN HELP GET THE FAMILY
18 MEMBERS AND THE EX-MEMBER OF THE GROUP TO BEGIN TO REBUILD
19 NORMAL RELATIONS. WITHIN THAT PROCESS WE THEN EXPECT ANYWHERE
20 FROM A YEAR TO MANY YEARS OF A CONSISTENT PROCESS OF GOING STEP
21 BY STEP BY STEP TO REBUILD THEIR LIVES.

22 IN THE CASE OF MR. MULL, THAT REHABILITATION
23 PROCESS HAS BEEN SEVERELY TRUNCATED, SEVERELY MANIPULATED. THE
24 INTENSE CONDEMNATION THAT HE RECEIVED AS A RESULT OF LEAVING,
25 THE LONG INTERVIEW WITH ELIZABETH CLARE PROPHET, MR. SHEARER,
26 AND MR. FRANCIS I THINK HAD AN ENORMOUS DESTRUCTIVE IMPACT ON
27 HIS SENSE OF SELF, HIS SELF-ESTEEM AND CERTAINLY HIS SENSE OF
28 SPIRITUALITY. AND THEIR JUDGMENTS OF HIM THAT HE WAS THE BEAST

1 AND THE SERPENT HAD SUCH A PROFOUND AFFECT ON GREGORY THAT HIS
2 CAPACITY I THINK TO FIND HIS WAY IN THE WORLD BECAME SEVERELY
3 DAMAGED. AND THEN HE HAD A NUMBER OF MEDICAL OCCURRENCES WHICH
4 I THINK WERE A DIRECT RESULT OF ALL OF THAT STRESS AND PROBLEM.

5 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT TO THAT LAST
6 PART AS AGAIN GOING BEYOND HIS EXPERTISE WHEN HE TALKED ABOUT
7 MEDICAL PROBLEMS.

8 THE COURT: THE VERY LAST STATEMENT OF THE WITNESS IS
9 STRICKEN.

10 THE JURY IS DIRECTED TO DISREGARD IT.

11 Q BY MR. LEVY: RABBI ROBBINS, DID GREGORY MULL TELL
12 YOU THAT ELIZABETH WAS MANIPULATIVE?

13 A. YES, HE DID.

14 Q. DID HE TELL TALK SHE WAS DUPLICITOUS?

15 A. YES, HE DID.

16 Q. DID HE TELL YOU THAT SHE HAD A DOUBLE STANDARD,
17 ONE FOR HERSELF AND ONE FOR HER FOLLOWERS?

18 A. YES, HE DID.

19 Q. DID HE TELL YOU LOT OF HIS EXPERIENCES DIRECTLY
20 WITH HER?

21 A. YES, HE DID.

22 Q. AS A RESULT OF WHAT YOU HAVE LEARNED ABOUT
23 ELIZABETH CLARE PROPHET AND YOUR EXTREME AND EXPLICIT TESTIMONY
24 TODAY, DO YOU DISLIKE HER?

25 A. NO.

26 Q. DO YOU HAVE ANY FEELINGS WHATSOEVER?

27 A. I FEEL A GREAT SENSE OF SADNESS. ONE OF THE
28 THINGS THAT I HAVE LEARNED ABOUT PEOPLE WHO ARE IN THESE

1 ORGANIZATIONS, WHETHER THEY ARE FOLLOWERS OR LEADERS, IS THAT
2 THERE IS A GREAT SENSE OF SPIRITUAL NEED AND LONGING. I HAVE
3 COME TO UNDERSTAND BOTH IN MYSELF AS A RABBI AS A RELIGIOUS
4 PERSON AND AS ONE DEALING WITH PEOPLE WHO HAVE BEEN DAMAGED BY
5 RELIGIOUS EXCESSES THE FOLLOWING FOR ME WHICH IS A TRUTH THAT
6 GOD'S PRESENCE TO ALL OF US AND ALL OF US HAVE THAT POWER OF
7 THE DIVINE WITHIN US. WHAT HAPPENS IS THAT THOSE OF US WHO
8 CAN'T DEAL WITH IT WILL SOMETIMES USE IT AND TWIST IT TO
9 PROTECT OURSELVES FROM THE WORLD AND OTHER PEOPLE.

10 ONE OF THE THINGS I THINK THAT CATEGORIZES THIS
11 ORGANIZATION IS A GREAT SENSE OF PARANOIA AND ANGER AT THE
12 WORLD. THE MANIPULATION OF OTHERS, MR. MULL IN PARTICULAR, I
13 THINK IS AN EXPRESSION OF A GREAT DEAL OF PAIN AND ANGUISH THAT
14 THE LEADERS OF THIS CHURCH MUST FEEL IN THEMSELVES.

15 ONE OF THE THINGS I HAVE FOUND THAT IS A TRUISM
16 ABOUT PEOPLE WHO HAVE BEEN IN THESE ORGANIZATIONS IS THAT THE
17 RELIGIOUS; COERCIVE RELIGIOUS ORGANIZATION WILL PROVIDE AN
18 ENVIRONMENT IN WHICH THEIR OWN SPIRITUAL DOUBTS ARISE AND WHEN
19 INDIVIDUAL BEGINS TO FEEL FREED FROM THEM THE LEADER OF THE
20 GROUP REACHES OUT AND GRABS IT AND SAYS SEE WHAT I DID FOR YOU
21 AND, THEREFORE, TAKES POSSESSION OF IT AND TWIST IT AND TAKES
22 IT AWAY FROM THE ASPIRANT TO SOME TRUTH. I FIND THAT VERY SAD
23 AND I FIND THAT VERY PATHETIC.

24 Q. ONE LAST QUESTION.

25 HAVE YOU MADE AN ASSESSMENT AS TO THE DAMAGES THAT
26 GREGORY MULL SUFFERED AND MUST LIVE WITH FROM NOW ON?

27 A. YES, I HAVE.

28 Q. WOULD YOU TELL US AND EXPLAIN YOUR CONCLUSION.

1 MR. KLEIN: OBJECTION. LACK OF FOUNDATION, YOUR HONOR.
2 THE COURT: OVERRULE.

3 THE WITNESS: MY SENSE IS THAT GREGORY HAS BEEN SEVERELY
4 HURT, THAT HE EXPERIENCES THE SPIRITUAL AND EMOTIONAL PAIN OF
5 BOTH HIS MEMBERSHIP AND HIS EXPULSION FROM CHURCH UNIVERSAL &
6 TRIUMPHANT CONSISTENTLY AND CONSTANTLY, THAT AT THE CORE OF
7 THAT PAIN WAS WHAT HE FIRST EXPERIENCED AS THE LOVE OF
8 ELIZABETH CLARE PROPHET AND THEN HER TOTAL REJECTION OF HIM.
9 IN OUR DISCUSSIONS FOR HIM IT WAS ALMOST LIKE A DEATH AND HE
10 MUST LIVE WITH A SENSE THAT SOMEHOW GOD REJECTED HIM AND MUST
11 GO ON LIVING WITH THAT.

12 THE SEVERE JUDGMENTS ABOUT HIS LIFE EITHER AS THE
13 BEAST OR THE SERPENT I THINK HAS SCARRED HIM WITH A SENSE THAT
14 PERHAPS HE IS, THAT HE IS SO UNSURE OF HIMSELF NOW THAT
15 FREQUENTLY I THINK HE LAPSES INTO A PERIOD OF SELF-DOUBT. ONE
16 OF THE THINGS I NOTICED WITH HIM, AND WE DISCUSSED, WAS HIS
17 TONGUE THRUSTING WHEN WE SPEAK. AND I ASKED HIM IF THAT COULD
18 BE A RESULT OF HIS IDENTIFYING WITH THE JUDGMENT THAT HE MAY BE
19 THE SERPENT. HE BECAME VERY UPSET AT THAT. AND MY SENSE AS A
20 RESULT OF THAT IS THAT ON SOME LEVEL HE DOES, THOUGH HE ALWAYS
21 TOTALLY REJECTS IT.

22 I BELIEVE THAT HIS CONFUSION WILL LIVE WITH HIM
23 THE REST OF HIS LIFE. I THINK THAT HIS SENSE OF BEING A VICTIM
24 IN SOMEWAYS LIKE THOSE PEOPLE WHO WERE IN CONCENTRATION CAMPS
25 ARE VICTIMS WILL LIVE WITH THE SCARS AND THE PAIN FOR THE REST
26 OF HIS LIFE. IN MY OPINION, HE WILL HAVE A VERY DIFFICULT TIME
27 FINDING HIS PLACE IN THE WORLD AND MORE SPECIFICALLY ANY SENSE
28 OF SPIRITUAL WHOLENESS WHICH WILL REPLACE THE ACHING SENSE OF

1 LOSS AS A CONSEQUENCE OF THIS EXPERIENCE.

2 IN OUR DISCUSSIONS ABOUT RELIGION AND ABOUT GOD HE
3 BOTH STILL HAS A GREAT SENSE OF OVERWHELMING NEED AND DESIRE
4 AND YET A GREAT SENSE OF FEAR. I THINK HIS FEAR ULTIMATELY IS
5 THAT HE MIGHT FIND IT AGAIN AND SOMEBODY MIGHT TAKE IT AWAY.
6 THAT SENSE OF POWERLESSNESS AND ABJECTNESS ABOUT HIM, SENSE OF
7 SADNESS I THINK WILL REMAIN WITH GREGORY UNTIL HE DIES.

8 I FIND THAT HORRIBLY PATHETIC. I WISH THERE WERE
9 A WAY TO REDO IT. I'M NOT SURE IT'S POSSIBLE.

10 MR. LEVY: THANK YOU VERY MUCH.

11 NO FURTHER QUESTIONS ON DIRECT, YOUR HONOR.

12 THE COURT: WE WILL TAKE OUR MORNING RECESS AT THIS
13 TIME.

14 (RECESS.)

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1 LOS ANGELES, CALIFORNIA; TUESDAY, FEBRUARY 25, 1986; 11:19 A.M.

2 -000-

3 *****

4 THE COURT: PLEASE PROCEED.

5 MR. MIDDLETON: YOUR HONOR, AT THIS TIME WE HAVE AGREED
6 BETWEEN COUNSEL THAT WE WILL TAKE ANOTHER WITNESS OUT OF ORDER
7 DUE TO SOME SCHEDULING PROBLEMS WITH PATIENTS THAT HE HAS THIS
8 AFTERNOON. WE'RE GOING TO ATTEMPT TO COMPLETE HIM THIS
9 MORNING. THANK YOU, YOUR HONOR.

10 AT THIS TIME, WE WOULD CALL DR. AFSHAR TO THE
11 STAND.

12 THE COURT: WE WILL TRY TO TAKE CARE OF IT THIS MORNING.
13 I HAVE AN ENGAGEMENT THAT REQUIRES ME TO LEAVE A FEW MINUTES
14 BEFORE 12. WE WILL DO THE BEST WE CAN.

15

16

17 HOSEIN AFSHAR,
18 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
19 AS FOLLOWS:

20 THE CLERK: PLEASE BE SEATED IN THE WITNESS STAND.

21 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND
22 PLEASE SPELL YOUR FIRST AND LAST NAME.

23 THE WITNESS: FIRST NAME, H-O-S-E-I-N, LAST NAME AFSHAR,
24 A-F-S-H-A-R.

25 THE CLERK: THANK YOU.

26

27 DIRECT EXAMINATION

28 BY MR. MIDDLETON:

Q DOCTOR, WOULD YOU STATE YOUR OCCUPATION.

- 1 A. I'M A CARDIOLOGIST PHYSICIAN.
- 2 Q. HOW LONG HAVE YOU BEEN SO EMPLOYED?
- 3 A. I'M SELF-EMPLOYED. BUT I HAVE BEEN LICENSED TO
- 4 PRACTICE MEDICINE UNITED STATES SINCE 1985.
- 5 Q. WHERE DID YOU RECEIVE YOUR EDUCATION --
- 6 A. I AM SORRY SINCE 1975.
- 7 Q. SINCE 1975?
- 8 A. THAT'S RIGHT.
- 9 Q. WHERE DID YOU RECEIVE YOUR EDUCATION?
- 10 A. MY MEDICAL SCHOOL WAS IN IRAN.
- 11 Q. AT WHAT UNIVERSITY?
- 12 A. P-A-H-L-A-V-I.
- 13 Q. DID YOU DO AN INTERNSHIP?
- 14 A. IN UNITED STATES.
- 15 Q. WHERE WAS THAT?
- 16 A. RAINIER STATE UNIVERSITY IN MICHIGAN.
- 17 Q. WHAT YEAR WAS THAT?
- 18 A. 1974, 1975.
- 19 Q. YOU SAY THAT WAS IN MICHIGAN?
- 20 A. THAT'S RIGHT.
- 21 Q. WHEN DID YOU COME TO CALIFORNIA?
- 22 A. IN JUNE OF 1982.
- 23 Q. IN JUNE OF 1982. WAS THERE A REASON YOU CAME TO
- 24 CALIFORNIA?
- 25 A. YES. I LIKED WEATHER HERE BETTER.
- 26 Q. YOU LIKE THE WEATHER HERE BETTER?
- 27 A. THAT'S RIGHT.
- 28 Q. I CAN SYMPATHIZE WITH THAT.

1 ARE YOU LICENSED IN CALIFORNIA?

2 A. YES.

3 Q. AND YOU HAVE A SPECIALTY HERE?

4 A. MY SPECIALTY IS UNIVERSAL. I SPECIALIZE IN
5 INTERNAL MEDICINE AND CARDIOLOGY IN THE ENTIRE UNITED STATES.

6 Q. ARE YOU BOARD CERTIFIED?

7 A. IN INTERNAL MEDICINE AND CARDIOLOGY.

8 Q. ARE YOU A DIPLOMATE?

9 A. YES, INTERNAL MEDICINE AND CARDIOLOGY.

10 Q. THANK YOU. YOUR TEST FOR CERTIFICATION, DID YOU
11 PASS THEM ON THE FIRST TIME THAT YOU TOOK THEM?

12 A. YES.

13 Q. ARE YOU ON THE STAFF OF ANY HOSPITALS?

14 A. YES. AT LOS ROBLES HOSPITAL IN THOUSAND OAKS;
15 SIMI VALLEY COMMUNITY HOSPITAL, SIMI VALLEY; SIMI VALLEY
16 ADVENTIST HOSPITAL, SIMI VALLEY AND WESTLAKE HOSPITAL IN
17 WESTLAKE.

18 Q. WHERE DO YOU HOLD YOUR OFFICES?

19 A. WESTLAKE AND SIMI VALLEY.

20 Q. SO YOU HAVE TWO OFFICES?

21 A. THAT'S RIGHT.

22 Q. DO YOU KNOW THE PLAINTIFF GREGORY MULL?

23 A. YES, I DO.

24 Q. WHEN DID YOU MEET GREGORY MULL?

25 A. IN 1984.

26 Q. AND DO YOU REMEMBER THE CIRCUMSTANCES OF THAT
27 MEETING?

28 A. YES. HE CAME TO THE EMERGENCY ROOM OF WESTLAKE

1 HOSPITAL AND SINCE I WAS THE CARDIOLOGIST ON THE PANEL ON CALL
2 FOR THE WESTLAKE HOSPITAL THEY ASKED ME TO COME AND SEE HIM.

3 Q. DID YOU SEE HIM AT THAT TIME?

4 A. YES, I DID.

5 Q. WHAT WERE MR. -- DID MR. MULL HAVE ANY COMPLAINTS
6 AT THAT TIME?

7 A. YES. HIS COMPLAINTS WERE SEVERAL. HE WAS
8 COMPLAINING OF CHEST PAIN AND THAT WAS THE MAIN REASON THAT I
9 WAS INVOLVED AND IN THE MEANTIME WHEN I WENT TO TALK TO HIM HE
10 WAS ALSO COMPLAINING OF WEAKNESS AND PROBLEM WITH HIS SPEECH.

11 Q. WEAKNESS, PROBLEM WITH HIS SPEECH. DID YOU AT
12 THAT TIME TREAT HIM?

13 A. YES, I PUT HIM IN INTENSIVE CARE UNIT BECAUSE OF
14 THE CHEST PAIN AND CARD -- ELECTROCARDIOGRAM WAS DONE AND
15 DURING THAT SESSION HEART ATTACK WAS EXCLUDED AND SINCE HE DID
16 HAVE NEUROLOGICAL PROBLEMS I ASKED NEUROLOGIST TO EXAMINE HIM.

17 Q. DID YOU MAKE A PRELIMINARY DIAGNOSIS AT THAT
18 POINT?

19 A. AT THAT POINT I -- NEUROLOGICALLY I FELT THE
20 PATIENT MIGHT HAVE STROKE BUT VERY LIGHT STROKE BUT I WAS NOT
21 SURE; THAT'S WHY I ASKED THE NEUROLOGIST TO SEE HIM.

22 Q. DID YOU TAKE ANY NOTES AT THE TIME THAT YOU
23 INTERVIEWED GREGORY MULL?

24 A. YES, I DID.

25 Q. DID YOU TRANSCRIBE THOSE NOTES?

26 A. YES, I DID.

27 Q. THE ORIGINAL NOTES, DO YOU STILL HAVE THEM?

28 A. YES.

1 Q. THE ORIGINAL NOTES WHEN YOU FIRST TALKED TO
2 GREGORY MULL IN THE HOSPITAL?

3 A. THE ORIGINAL DICTATION.

4 Q. THE ORIGINAL DICTATION YOU HAVE?

5 A. YES, SIR.

6 Q WHICH HAS BEEN TRANSCRIBED, TYPED UP?

7 A. THAT'S RIGHT.

8 Q. IN THAT DICTATION, DID MR. MULL DISCUSS HAVING ANY
9 STRESS WITH YOU?

10 A. MR. MULL MENTIONED THAT HE HAS BEEN -- AT THAT
11 TIME HE WAS TELLING ME THAT HE HAS BEEN UNDER LOT OF STRESS.

12 Q. DID YOU NOTE THAT IN YOUR NOTES?

13 A. I BELIEVE I DID, YES.

14 Q. WHY DID YOU NOTE THAT IN YOUR NOTES? IS THERE A
15 REASON THAT YOU WOULD PUT THAT NOTATION DOWN?

16 A. WELL, ORIGINALLY WHEN HE CAME WITH THE CHEST PAIN
17 THE POSSIBILITY OF STRESS AND HEART ATTACK IS VERY CLOSE
18 CORRELATION SO THAT WAS IMPORTANT AND, SECONDLY, I USUALLY DO A
19 VERY COMPREHENSIVE HISTORY, PHYSICAL EXAMINATION AS MUCH AS
20 POSSIBLE SO EVEN SOMETHING WHICH MAY NOT BE A HUNDRED PERCENT
21 RELATED I MAY PUT IT IN THE NOTE.

22 Q. DID MR. MULL DISCUSS STRESS DUE TO FINANCIAL
23 PROBLEMS WITH YOU?

24 A. I BELIEVE HE DID.

25 Q. DID HE DISCUSS STRESS WITH REGARD TO ANY OTHER
26 AREAS?

27 A. I DON'T REMEMBER. BUT IN THAT SESSION -- BUT
28 LATER HE WAS TELLING ME ABOUT STRESS RELATED TO THE PROBLEM

1 THAT HE HAD, A CONFLICT THAT HE HAD WITH THE CHURCH, BUT I
2 NEVER WENT THROUGH THE DETAILS OF THE PROBLEM.

3 Q. DID YOU EVER MAKE A RECOMMENDATION TO HIM WITH
4 REGARD TO THOSE PROBLEMS?

5 A. YES, AT ONE POINT WHEN HE REPEATEDLY WAS
6 COMPLAINING OF THAT I ASKED HIM TO SEE THE PSYCHIATRIST.
7 SEVERAL TIMES I ASKED HIM TO SEE A PSYCHIATRIST.

8 Q. THAT WAS YOUR IMPRESSION HE SHOULD SEE A
9 PSYCHIATRIST?

10 A. YES.

11 Q. YOU SAY THAT THE INITIAL DIAGNOSIS OR PRELIMINARY
12 DIAGNOSIS WAS ARTERIOSCLEROTIC CEREBRAL VASCULAR DISEASE OR
13 STROKE?

14 A. THAT'S RIGHT.

15 Q. WAS A SUBSEQUENT DIAGNOSIS MADE?

16 A. AFTER THE NEUROLOGIST EXAMINED HIM AND SINCE THE
17 PICTURE WAS NOT VERY CLEAR CUT HE RECOMMENDED TO HAVE ANGIOGRAM
18 OF THE VESSELS OF THE BRAIN AND THE RESULT OF THAT ANGIOGRAM
19 WAS FIBROMUSCULAR HYPERTROPHY.

20 Q. FIBROMUSCULAR HYPERTROPHY?

21 A. THAT'S RIGHT.

22 Q. WHAT IS THAT?

23 A. THIS IS THE INCREASE IN THE SIZE OF THE CELLS OF
24 THE VESSELS OF THE BRAIN.

25 Q. AND THAT CAN CAUSE A STROKE?

26 A. IF IT IS ASSOCIATED WITH THE SPASM OR IF IT IS
27 VERY SEVERE THAT CAN CAUSE THE LACK OF SECRETION TO PART OF THE
28 VEIN WHERE THAT VESSEL IS SUPPLYING AND THAT CAN CAUSE A

1 STROKE.

2 Q. DO WE KNOW WHAT CAUSES FIBROMUSCULAR HYPERTROPHY?

3 A. NO.

4 Q. THERE IS NO KNOWN CAUSE?

5 A. NOT TO MY KNOWLEDGE.

6 Q. DO WE KNOW WHETHER STRESS PLAYS A FACTOR IN THAT
7 OR NOT?

8 A. IT MAY.

9 Q. BUT WE DON'T KNOW FOR SURE?

10 A. BUT WE DON'T KNOW FOR SURE.

11 GENERALLY SPEAKING IN -- STRESS CAN CAUSE
12 FORMATION OF ADRENALINE WHICH IS A HORMONE AND ADRENALINE CAN
13 CONSTRICT THE VESSELS AND IF ONE ALREADY HAS AN UNDERLYING
14 FIBROMUSCULAR HYPERTROPHY FURTHER CONSTRICTION AT THE AREA OF
15 ALREADY NARROWING MAY CAUSE DEPRIVATION OF PART OF THE VEIN
16 FROM BLOOD SUPPLY AND MAY CAUSE A STROKE.

17 Q. DID YOU PERFORM ANY TESTS ON GREGORY MULL?

18 A. MULTIPLE TESTS.

19 Q. MULTIPLE TESTS. THERE WERE CERTAIN TESTS THAT I
20 AM REFERRING TO AT THE BEGINNING WHEN HE CAME IN FOR TEST DUE
21 TO POSSIBLE STROKE. CAN YOU EXPLAIN THOSE TESTS, WHAT THOSE
22 WERE.

23 A. YES. THOSE THAT WERE PERTINENT TO HIS NEUROLOGIC
24 PROBLEM WERE ELECTROENCEPHALOGRAM, WAS CAT SCAN OF THE BRAIN
25 WHICH ONE TAKES THE PICTURE OF THE BRAIN AND THE FINAL ONE WAS
26 CEREBRAL ANGIOGRAM.

27 Q. THE ANGIOGRAM TEST IS THAT -- I READ SOMETHING
28 WITHIN THE NOTES SOME WIRES OR SOMETHING GO UP OR THROUGH --

1 A. WIRE GOES THROUGH THE GROIN.

2 Q. AND --

3 A. AND THEN WHEN IT IS PLACED AT THE LEFT OF THE
4 CAROTID ARTERY THEY INJECT THE DYE AND TAKE THE PICTURE.

5 Q. SO THAT IS THE TYPE OF TEST THAT WAS PERFORMED?

6 A. THAT'S RIGHT.

7 Q. WAS THERAPY RECOMMENDED FOR GREGORY MULL AT THAT
8 TIME?

9 A. AT THAT POINT JUST CONSERVATIVE MANAGEMENT AND THE
10 THE PATIENT WAS GRADUALLY RECOVERING FROM HIS NEUROLOGICAL
11 PROBLEM AFTER BEING IN THE HOSPITAL IN THREE DAYS.

12 Q. THEN SUBSEQUENT TO THAT, DID YOU HAVE AN OCCASION
13 TO SEE GREGORY MULL AGAIN?

14 A. YES, MULTIPLE TIMES.

15 Q. REFERRING SPECIFICALLY -- YOU SAW HIM MULTIPLE
16 TIMES. BUT I'M REFERRING NOW TO A TIME, SAY, IN 1985 --

17 A. IN 1985, IN SUMMER OF 1985, HE WAS READMITTED TO
18 WESTLAKE HOSPITAL BECAUSE HE CAME WITH INABILITY TO TALK AND
19 NOT BEING ABLE TO SEE BECAUSE OF HIS EYELIDS WAS CLOSED ON ONE
20 SIDE AND ALSO WEAKNESS ON ONE SIDE OF HIS BODY. THIS WAS VERY
21 SIMILAR TO HIS SYMPTOM IN 1984 BUT MUCH MORE SEVERE.

22 Q. SIMILAR TO THE SYMPTOM IN '84 BUT NOW MORE SEVERE?

23 A. THAT'S RIGHT.

24 Q. WERE TESTS RUN AT THAT TIME?

25 A. AGAIN HE HAD ELECTROENCEPHALOGRAM, HE HAD CAT SCAN
26 OF THE BRAIN AND THIS TIME THE RECOVERY WAS MUCH SLOWER AND
27 WHEN HE LEFT THE HOSPITAL HE STILL HAD SOME SEQUELAE OF HIS
28 NEUROLOGIC DEFICIT.

1 Q. WERE ANY NEW TESTS RUN?

2 A. LATER WHEN HE WAS SEEN MYSELF AND THE NEUROLOGIST
3 WHO SAW HIM SINCE 1984 AND HE SUSPECTED POSSIBILITY OF MULTIPLE
4 SCLEROSIS. HE SENT HIM TO TARZANA HOSPITAL WHERE HE HAD A TEST
5 WHICH IS CALLED NMR, NMR STANDS FOR NUCLEAR MAGNETIC RESONANCE
6 A NEW DIAGNOSTIC TOOL AND THE RESULT OF THAT TEST WAS
7 CONSISTENT WITH MULTIPLE SCLEROSIS.

8 Q. HOW NEW IS THAT TEST? YOU SAY IT'S A NEW TEST?

9 A. PROBABLY IN THE PAST TWO OR THREE YEARS.

10 Q. IT'S IN THE PAST TWO OR THREE YEARS. YOU FOUND
11 THE RESULTS CONSISTENT WITH MULTIPLE SCLEROSIS?

12 A. THAT'S TRUE.

13 Q. IS IT YOUR PRESENT -- WHAT IS YOUR PRESENT
14 DIAGNOSIS CONCERNING GREGORY MULL?

15 A. THAT HE HAS MULTIPLE SCLEROSIS.

16 Q. IS IT ALSO YOUR PRESENT DIAGNOSIS THAT HE HAD IT
17 IN 1984 WHEN HE FIRST CAME TO YOU?

18 A. SINCE THE SYMPTOMS IN 1985 WAS VERY SIMILAR TO THE
19 SYMPTOMS IN 1984 BUT MORE SEVERE SO RETROSPECT WE HAVE MADE A
20 DIAGNOSIS THAT PROBABLY HE DID HAVE MULTIPLE SCLEROSIS TO BEGIN
21 WITH.

22 Q. CAN YOU TELL US WHAT CAUSES MULTIPLE SCLEROSIS?

23 A. THERE IS NO KNOWN ETYMOLOGY FOR MULTIPLE SCLEROSIS
24 BUT THERE ARE THEORIES. SOME PEOPLE THINK THAT --

25 MR. KLEIN: YOUR HONOR, I'M GOING TO OBJECT TO THE
26 FOUNDATION OF THIS WITNESS TESTIFYING ABOUT THE THEORIES OF
27 MULTIPLE SCLEROSIS. IT'S A NEUROLOGICAL DISEASE. I DON'T
28 BELIEVE HE'S A NEUROLOGIST.

1 THE COURT: HE CAN ANSWER IT.

2 MR. MIDDLETON: THANK YOU, YOUR HONOR.

3 Q. YOU CAN ANSWER IT.

4 A. THERE ARE THEORIES OF WHAT THE POSSIBLE ETYMOLOGY
5 OF MULTIPLE SCLEROSIS ARE. ONE IS THEY THINK THAT SOME VIRUSES
6 THAT WE STILL DON'T KNOW WHICH TYPE CAN BE THE ETYMOLOGY. IN
7 THE PATIENTS WHO -- SERUM OF THE PATIENTS WHO HAVE HAD MULTIPLE
8 SCLEROSIS THEY HAVE FOUND ELEVATED LEVEL OF SEVERAL TYPE OF
9 VIRUSES. WHETHER THERE IS ANY CORRELATION BETWEEN THOSE
10 VIRUSES AND MULTIPLE SCLEROSIS WE DON'T KNOW.

11 ON THE OTHER HAND, THERE IS A POSSIBILITY THAT
12 MAYBE AN IMMUNOLOGICAL PROBLEM EXIST WHICH PLAYS A ROLE IN
13 MULTIPLE SCLEROSIS. BUT WHAT EXACTLY IS THE ETYMOLOGY WE DON'T
14 KNOW.

15 Q. DO YOU KNOW WHETHER OR NOT STRESS PLAYS A FACTOR
16 IN MULTIPLE SCLEROSIS?

17 A. I DON'T KNOW EXACTLY IF STRESS PLAYS ANY DEFINITE
18 ROLE IN MULTIPLE SCLEROSIS. BUT SINCE STRESS IS A FACTOR IN
19 MANY VASCULAR -- NEUROVASCULAR AND NEUROLOGICAL PROBLEM IT MAY
20 BE A PERCIPITATING FACTOR OR MAY PLAY A ROLE IN PATIENTS WHO
21 HAVE MULTIPLE SCLEROSIS IN BRINGING UP THE SYMPTOM. BUT I'M
22 NOT SURE. WE CANNOT BE A HUNDRED PERCENT SURE.

23 Q. CAN ANYONE KNOW IN MEDICINE -- TODAY DOES ANYONE
24 KNOW?

25 A. NOT TO MY KNOWLEDGE.

26 Q. WHAT IS YOUR ESTIMATE OF THE COST INVOLVED SO FAR
27 IN THE TREATMENT OF GREGORY MULL AS FAR AS YOU'RE CONCERNED?

28 A. MY COST IN THE PAST TWO YEARS APPROXIMATELY

1 SEVERAL THOUSAND.

2 Q. IN THE FUTURE CAN YOU ESTIMATE WHAT TIME IS
3 GREGORY MULL GOING TO NEED CARE IN THE FUTURE?

4 A. GENERALLY, THE PROGNOSIS OF MULTIPLE SCLEROSIS IS
5 NOT GOOD. BUT PATIENTS MAY LAST A FEW MONTHS, A FEW YEARS OR
6 TEN YEARS. WE DON'T KNOW. ALL DEPENDS ON HOW LONG HE LAST.

7 Q. ALL RIGHT. ASSUME THAT HE MAY LIVE TEN YEARS,
8 WILL HE NEED FUTURE MEDICAL SERVICE?

9 A. GENERALLY SPEAKING MULTIPLE SCLEROSIS IS A
10 PROGRESSIVE DISEASE AND AS THE PROBLEM PROGRESSES HE NEEDS MORE
11 NURSING CARE.

12 Q. WHAT ARE HIS CHANCES OF RECOVERY?

13 A. I'M NOT AWARE OF ANY PATIENT WITH MULTIPLE
14 SCLEROSIS THAT HAS RECOVERED. I DON'T KNOW.

15 Q. IN YOUR OPINION, WHAT IS THE OUTLOOK FOR HIM IN
16 THE FUTURE?

17 A. THAT GENERALLY SPEAKING PATIENTS WITH MULTIPLE
18 SCLEROSIS THEY PROGRESS AND GET WORSE.

19 Q. IN YOUR OPINION, WILL HE EVER LEAD A NORMAL LIFE?

20 A. USUALLY NOT.

21 Q. AND DO YOU BELIEVE THAT HE WILL NEED DOCTOR'S
22 CARE?

23 A. USUALLY IF NOT DOCTOR'S HE AT LEAST NEEDS NURSING
24 CARE.

25 Q. HOSPITAL CARE?

26 A. HE MAY WHEN HIS SYMPTOM RECUR AGAIN.

27 Q. YOU SAID NURSING CARE. PERHAPS ANY THERAPY?

28 A. MAYBE.

1 Q. WHEN GREGORY MULL SAW YOU IN 1985, DID YOU
2 RECOMMEND ANY TYPE OF THERAPY FOR HIM?

3 A. HE WAS SEEN -- AT ONE POINT HE WAS PUT ON STEROIDS
4 AND I DON'T BELIEVE THAT WAS VERY BENEFICIAL AND THAT WAS
5 DISCONTINUED LATER.

6 Q. WAS THERE ANY TYPE OF SPEECH THERAPY FOR HIM?

7 A. YES, HE HAD SPEECH THERAPY UNDER THE CARE OF DR.
8 NASHI AND ALSO REHAB OF WESTLAKE HOSPITAL.

9 Q. WAS ANY MEDICATION EVER DESCRIBED FOR MR. MULL?

10 A. HIS MEDICATION WAS MAINLY THE STEROIDS. AND I
11 DON'T BELIEVE HE'S ON ANY MEDICATION THAT I RECALL.

12 MR. MIDDLETON: THANK YOU.

13 ONE MOMENT, YOUR HONOR.

14 (CONFERS WITH CO-COUNSEL.)

15 NO FURTHER QUESTION OF THE WITNESS, YOUR HONOR.

16 THE COURT: VERY WELL.

17 MR. KLEIN: THANK YOU, YOUR HONOR.

18

19 CROSS-EXAMINATION

20 BY MR. KLEIN:

21 Q GOOD MORNING, DOCTOR.

22 A. GOOD MORNING.

23 Q. IS IT FAIR TO SAY THAT AS OF TODAY AS FAR AS YOU
24 ARE CONCERNED MR. MULL HAS MULTIPLE SCLEROSIS?

25 A. THAT'S RIGHT.

26 Q. AND THAT WHATEVER -- REGARDLESS OF WHAT YOU
27 THOUGHT HE HAD IN 1984 THAT YOU'RE NOW CONVINCED THAT WAS ALSO
28 MULTIPLE SCLEROSIS?

1 A. PROBABLY.

2 Q. IS IT FAIR TO SAY THAT AS YOU SIT HERE YOU CANNOT
3 SAY IT WAS MORE PROBABLE THAN NOT THAT STRESS PLAYED A PART IN
4 MR. MULL DEVELOPING MULTIPLE SCLEROSIS?

5 A. I CANNOT SAY ONE WAY OR THE OTHER.

6 Q. SO, IT'S JUST AS POSSIBLE THAT STRESS PLAYED NO
7 PART IN HIM DEVELOPING MULTIPLE SCLEROSIS AS IT IS THAT IT
8 PLAYED SOME PART, IS THAT TRUE?

9 A. IT MAY HAVE PLAYED SOME PART.

10 Q. YOU DON'T KNOW?

11 A. I DON'T KNOW.

12 Q. IS IT FAIR TO SAY YOU CANNOT SAY THAT IT IS MORE
13 PROBABLE THAN NOT THAT STRESS PLAYED ANY ROLE IN ACTIVATING
14 MR. MULL'S MULTIPLE SCLEROSIS EITHER IN 1984 OR 1985?

15 A. AGAIN --

16 MR. LEVY: EXCUSE ME, YOUR HONOR. AT THIS POINT I'M
17 GOING TO OBJECT. MR. KLEIN, I BELIEVE, IS MISCHARACTERIZING
18 THE TESTIMONY.

19 THE COURT: JUST TELL ME THE GROUNDS PLEASE.

20 MR. LEVY: MR. KLEIN IS MISCHARACTERIZING THE TESTIMONY
21 AS TO THE DIAGNOSIS IN 1984.

22 THE COURT: PLEASE REPHRASE YOUR QUESTION.

23 Q BY MR. KLEIN: IF AT ANY TIME MR. MULL'S MULTIPLE
24 SCLEROSIS WAS ACTIVATED, IS IT FAIR TO SAY THAT YOU CANNOT SAY
25 THAT IT WAS MORE PROBABLE THAN NOT THAT IT WAS ACTIVATED
26 BECAUSE OF STRESS?

27 A. STRESS PLAYS A ROLE IN MOST OF THE NEUROLOGICAL
28 PROBLEMS AND ACTIVATES OR PERCIPITATE THE SYMPTOMS IN QUITE A

1 FEW OF NEUROLOGICAL PROBLEM AND NEUROVASCULAR PROBLEM AND
2 VASCULAR PROBLEM. I DON'T KNOW IF MULTIPLE SCLEROSIS IS ONE OF
3 THE NEUROLOGICAL PROBLEMS. I DON'T KNOW. I DON'T BELIEVE IF
4 ANYBODY KNOWS IF THE STRESS DOES THE SAME THING IN MULTIPLE
5 SCLEROSIS. IT MAY.

6 Q. IT MAY AND IT MAY NOT?

7 A. IT MAY AND IT MAY NOT.

8 Q. SO, IT'S JUST AS POSSIBLE THAT STRESS PLAYS NO
9 ROLE IN ACTIVATING MULTIPLE SCLEROSIS AS IT IS POSSIBLE IT
10 PLAYS SOME ROLE, IS THAT FAIR?

11 A. THAT'S RIGHT.

12 Q. NOW, WHEN YOU MET MR. MULL AND FIRST EXAMINED HIM
13 IN WESTLAKE YOU TOLD US THAT YOU TOOK SOME NOTES AND THEN YOU
14 DICTATED A REPORT; IS THAT RIGHT?

15 A. THAT'S TRUE.

16 Q. AND WAS THE REPORT AN ACCURATE REFLECTION OF
17 EVERYTHING THAT THE NOTES STATED?

18 A. THAT'S TRUE.

19 Q. AND THE CHECK -- DO YOU DESTROY THE NOTES ONCE YOU
20 DICTATE THE REPORT?

21 A. THAT'S RIGHT.

22 Q. AND BEFORE YOU DESTROY THOSE NOTES, DO YOU CHECK
23 THEM OVER TO MAKE SURE THAT WHAT YOU HAVE DICTATED IS IN FACT
24 WHAT THE NOTES SAID?

25 A. WHEN THE NOTE IS -- WHEN THE DICTATION IS
26 TRANSCRIBED WITHIN 24 HOURS I GO THROUGH THE WHOLE THING VERY
27 ACCURATELY AND I DON'T SIGN IT UNLESS I KNOW THAT THIS REFLECTS
28 WHAT I DICTATED.

1 Q. SO, THAT'S HOW YOU KNOW THOUGH THAT WHEN YOU
2 DESTROY THE NOTES YOU HAVE ALREADY GOT IT IN THE DICTATION?

3 A. THAT'S RIGHT.

4 Q. IS IT CORRECT THAT IN YOUR NOTES IN THE HISTORY
5 THE PRESENT ILLNESS THAT YOU STATE THAT MR. MULL HAS BEEN UPS
6 DUE TO SEVERAL STRESSES FROM HIS FAMILY, JOB, AND ALSO
7 FINANCIAL PROBLEMS; IS THAT CORRECT?

8 A. THAT'S RIGHT.

9 Q. AND THAT'S THE ONLY REFERENCE TO WHAT CAUSED THE
10 STRESS, WHAT I JUST READ; IS THAT CORRECT?

11 A. THAT'S THE ONLY THING THAT I HAVE REFLECTED THERE

12 Q. WHICH MEANS THAT THAT WAS THE ONLY THING THAT WAS
13 IN YOUR NOTES?

14 A. THAT WAS THE ONLY THING WHICH WAS DICTATED.

15 Q. I UNDERSTAND. BUT WHAT I'M SAYING IS WHAT YOU
16 DICTATED IS WHAT WAS IN YOUR NOTES; IS THAT RIGHT?

17 A. THAT THE POINT. RIGHT.

18 Q. SO THEN WE ASSUME THERE WAS NOTHING ELSE IN YOUR
19 NOTES OTHER THAN WHAT I JUST READ AS FAR AS WHAT CAUSED THIS
20 STRESS, IS THAT FAIR?

21 A. AT THAT POINT, RIGHT.

22 Q. WITH RESPECT TO THE ORIGINAL DIAGNOSIS OF
23 FIBROMUSCULAR HYPERTROPHY AS FAR AS THAT IS CONCERNED IS THAT
24 ALSO A SITUATION WHERE YOU CANNOT SAY WHETHER OR NOT STRESS
25 PLAYED ANY PART IN CAUSING FIBROMUSCULAR HYPERTROPHY?

26 A. I DON'T KNOW IF STRESS CAN CAUSE FIBROMUSCULAR
27 HYPERTROPHY, BUT STRESS MAY PLAY A ROLE IN BRINGING UP THE
28 SYMPTOMS RELATED TO THE PROBLEM OF FIBROMUSCULAR HYPERTROPHY.

1 AGAIN I REPEAT MYSELF THAT IN THE STRESS WE KNOW THAT A HORMONE
2 CALLED ADRENALINE IS SECRETED, ADRENALINE CAN CAUSE VASA SPASM
3 AND THE PATIENT WHO ALREADY HAS UNDERLYING VASCULAR PROBLEM
4 LIKE FIBROMUSCULAR HYPOPLASIA FURTHER SPASM OF THE VESSEL CAN
5 FURTHER DEPRIVE PART OF THE BRAIN WHICH IS SUPPLIED BY THAT
6 VESSEL AND MAY PERCIPITATE SYMPTOMS RELATED TO THE PROBLEM THAT
7 THE PATIENT HAS.

8 Q. WHAT YOU HAVE JUST GIVEN US IS A POSSIBILITY? AM
9 I CORRECT THAT IT IS ALSO POSSIBLE THAT STRESS PLAYS NO ROLE IN
10 EITHER CAUSING OR ACTIVATING FIBROMUSCULAR HYPERTROPHY, IS THAT
11 POSSIBLE?

12 A. ALWAYS POSSIBLE.

13 Q. BY THE WAY, THE DIAGNOSIS OF MUSCULAR SCLEROSIS
14 THAT'S MADE BY A NEUROLOGIST; IS THAT RIGHT?

15 A. MULTIPLE SCLEROSIS, YES.

16 Q. AND YOU -- AM I CORRECT -- DON'T HAVE ANY
17 NEUROLOGICAL TRAINING; IS THAT RIGHT?

18 A. AT THE LEVEL OF INTERNAL MEDICINE, GENERAL
19 MEDICINE.

20 Q. YOU ARE SAYING --

21 A. BEFORE I BECAME CARDIOLOGIST AND BEFORE I BECAME
22 AN INTERNIST, I WAS GENERAL PHYSICIAN AND THAT COVERS THE BROAD
23 RANGE OF ALL MEDICAL PROBLEMS AND THEN I WENT TO THE TRAINING
24 OF INTERNAL MEDICINE WHICH IS A SPECIALTY OF GENERAL MEDICINE
25 AND IN THAT AREA ALSO WE HAVE SOME TRAINING OF NEUROLOGY AND
26 THEN I WENT TO CARDIOLOGY.

27 Q. BUT YOU'RE NOT A NEUROLOGIST?

28 A. I'M NOT A NEUROLOGIST.

1 MR. KLEIN: THANK YOU I HAVE NO FURTHER QUESTION, YOUR
2 HONOR.

3 MR. MIDDLETON: JUST A COUPLE, YOUR HONOR.

4

5

REDIRECT EXAMINATION

6 BY MR. MIDDLETON:

7 Q. DID YOU KNOW GREGORY MULL PRIOR TO MEETING HIM AT
8 WESTLAKE HOSPITAL?

9 A. NOT BEFORE FIRST TIME HE PRESENTED TO WESTLAKE
10 HOSPITAL IN 1984.

11 Q. WHEN YOU FIRST SAW HIM, HE WAS UNDER SOME PHYSICAL
12 DEBILITY AT THAT TIME?

13 A. HE WAS COMPLAINING OF SEVERE CHEST PAIN AND HE WAS
14 COMPLAINING OF WEAKNESS OF ONE SIDE OF HIS BODY AND PROBLEM
15 WITH HIS SPEECH.

16 Q. AND DO YOU RECALL WHETHER OR NOT HE MENTIONED ANY
17 PROBLEMS WITH REGARD TO THE CHURCH AT THAT TIME?

18 A. THE CHURCH -- SEVERAL TIMES HE BROUGHT IT UP IN
19 THE SUBSEQUENT VISITS THAT HE HAD WITH ME DURING MULTIPLE
20 OFFICE VISITS.

21 Q. SO WHETHER HE SAID IT OR NOT THE FIRST TIME --

22 A. WHETHER HE SAID IT THE FIRST TIME TO ME -- HE
23 MENTIONED FOR SURE THAT HE HAS BEEN UNDER STRESS AND WHETHER AT
24 THAT POINT HE MENTIONED CHURCH ALSO AMONG THE STRESSES I DON'T
25 KNOW. BUT HE DID SAY SUBSEQUENTLY THAT HE HAD PROBLEM AND
26 CONFLICT WITH THE CHURCH.

27 Q. YOU'RE ABSOLUTELY SURE OF THAT?

28 A. I AM ABSOLUTELY SURE OF THAT.

1 Q. DID YOU MAKE A RECOMMENDATION TO HIM SOMEWHERE
2 ALONG THE LINE?

3 A. THAT WAS WHEN I RECOMMENDED HIM TO SEE THE
4 PSYCHIATRIST AND THEN PSYCHOTHERAPIST AND THEN COUNSELOR.

5 MR. MIDDLETON: THANK YOU.

6 NO FURTHER QUESTIONS, YOUR HONOR.

7 MR. KLEIN: THANK YOU, YOUR HONOR.

8 NO QUESTIONS.

9 THE COURT: OKAY. YOU ARE EXCUSED. THANK YOU.

10 MR. KLEIN: YOUR HONOR, MAY I TALK TO AN ASSOCIATE JUST
11 FOR ONE MOMENT?

12 THE COURT: ALL RIGHT.

13 MR. LEVY: YOUR HONOR, IF I MAY IN KEEPING WITH YOUR
14 SCHEDULE AND YOUR LUNCHEON APPOINTMENT I DIDN'T WANT YOU TO GET
15 THERE UPSET AND RUSHED SO WE WENT AS FAST AS WE COULD SO YOU
16 COULD ENJOY LUNCH.

17 THE COURT: IT'S A COMBINATION PLEASURE AND BUSINESS.
18 YOU ALL HAVE HELPED TO MAKE IT MORE PLEASURABLE.

19 MR. MIDDLETON: THANK YOU.

20 THE COURT: WE WILL RESUME AT 130.

21 REMEMBER THE COURT'S ADMONITION.

22 (AT 11:47 A.M. A RECESS WAS TAKEN.)

23

24

25

26

27

28

1 LOS ANGELES, CALIFORNIA; TUESDAY, FEBRUARY 25, 1986; 1:46 P.M.

2 -000-

3 THE COURT: GOOD AFTERNOON.

4 THE CLERK: SIR YOU HAVE PREVIOUSLY BEEN SWORN AND STILL
5 UNDER OATH. WOULD YOU STATE YOUR NAME AGAIN FOR THE RECORD.

6 THE WITNESS: RABBI STEPHEN ROBBINS.

7 THE CLERK: THANK YOU.

8 THE COURT: PLEASE PROCEED.

9 MR. KLEIN: THANK YOU.

10

11 RABBI STEPHEN ROBBINS,
12 RESUMED THE STAND AND TESTIFIED FURTHER AS FOLLOWS,

13

14 CROSS-EXAMINATION

15 BY MR. KLEIN:

16 Q GOOD AFTERNOON, RABBI.

17 A. GOOD AFTERNOON.

18 Q. YOU WERE QUOTED IN A NEWSPAPER ARTICLE IN 1982 AS
19 MAKING THIS STATEMENT. I WOULD LIKE TO READ IT TO YOU. TELL
20 ME IF IT'S AN ACCURATE QUOTE. "IN A VERY REAL SENSE WE ARE AT
21 WAR, THE DISPUTED TERRITORY IS THE MIND OF OUR YOUNG AND AT
22 STAKE IS OUR SURVIVAL AS A PEOPLE."

23 A. I WOULD SAY THAT'S RELATIVELY ACCURATE. SOME
24 YEARS AGO. BUT IT SOUNDS FAMILIAR.

25 Q. DO YOU BELIEVE THAT THESE NEW AGE RELIGIONS, THE
26 CULTS AS YOU HAVE DESCRIBED THEM, THREATEN THE SURVIVAL OF THE
27 JEWISH PEOPLE?

28 A. NO. I BELIEVE THAT THEY THREATEN THE LIVES OF

1 SOME INDIVIDUALS AND I BELIEVE THAT SOME OF THESE GROUPS HAVE
2 DECLARED WAR ON EITHER THE JEWISH PEOPLE OR OTHER RELIGIONS,
3 BUT I DON'T BELIEVE THAT THEY WILL EITHER DESTROY OR TAKE OVER
4 EITHER JUDAISM OR ANY OF THE OTHER RELIGIONS.

5 Q. IT SAYS, "AT STAKE IS OUR SURVIVAL AS A PEOPLE."
6 WAS THAT REFERRING TO THE JEWISH PEOPLE?

7 A NO, THAT WAS REFERRING TO AMERICAN CIVILIZATION.
8 IF I REMEMBER THE CONTEXT OF THAT QUOTE, I WAS TALKING ABOUT
9 WHAT I THINK ARE SERIOUS DANGERS THAT GROUPS LIKE THIS RAISE
10 FOR FREEDOM OF RELIGION FOR INDIVIDUALS IN THE UNITED STATES
11 AND THAT CONSTITUTIONAL GUARANTEES WHICH WERE ORIGINALLY
12 PROVIDED FOR, IN MY OPINION, FOR FREEDOM OF THE INDIVIDUAL FOR
13 THEIR RELIGIOUS BELIEF HAS BECOME THE PROVINCE OF RELIGIOUS
14 ORGANIZATIONS AND THAT INDIVIDUAL RELIGIOUS AUTONOMY IS BEING
15 ATTACKED AND DESTROYED AND I THINK THAT REPRESENTS A CLEAR AND
16 PRESENT DANGER FOR AMERICAN CIVILIZATION.

17 Q. LET ME READ TO YOU THE NEXT LINE IN THAT ARTICLE;
18 YOU CAN TELL ME IF IT IS AN ACCURATE QUOTE. THERE IS ONE
19 LITTLE PART THAT'S CUT OFF; I WILL TELL YOU WHERE THAT IS.
20 ROBBINS WARNS, "OUR BEST WEAPON IS TRUTH AND OUR ARMY IS —"
21 AND IT HAS THE LETTER A. I CAN'T SEE THE REST OF IT. THE
22 LETTER "A SHARING OUR CONCERNS FOR THE SURVIVAL OF THE JEWISH
23 PEOPLE."

24 A. WITHOUT KNOWING WHAT THE REST OF THE WORD IS, IT'S
25 HARD FOR ME TO COMMENT. I'M A LITTLE CONFUSED. IF YOU CLARIFY
26 WHAT IT IS YOU WOULD LIKE TO KNOW FROM ME, I WILL RESPOND.

27 Q. I JUST WAS GETTING TO THAT POINT WHETHER IT WAS
28 THE SURVIVAL OF THE JEWISH PEOPLE YOU WERE CONCERNED ABOUT WITH

1 RESPECT TO THE THREAT FROM CULTS?

2 A. COULD I ASK YOU WHAT ARTICLE THAT IS. IS THERE A
3 TITLE TO IT?

4 Q. THE TITLE IS -- IT SAYS BULLETIN 15, FEBRUARY '82,
5 PAGE 3. THE TITLE OF THE REPORT ALL TASK FORCE STEPPING UP
6 ANTICULT EFFORTS BY J. SCHUSTER, S-C-H-U-S-T-E-R.

7 A. MY SENSE THAT THAT COMMENT MAY HAVE BEEN IN
8 RELATIONSHIP TO THE CHRISTIAN MISSIONARY ACTIVITIES IN WHICH
9 THERE ARE FALSE SYNAGOGUES BEING CREATED IN ORDER TO DECEIVE
10 PEOPLE JUDAISM EXIST IN A FORM THAT IT DOESN'T; I BELIEVE
11 THAT'S A CLEAR AND PRESENT DANGER TO THE JEWISH COMMUNITY.

12 Q. LET ME ALSO READ TO YOU ANOTHER QUOTE. THIS IS
13 FROM A TV PROGRAM YOU APPEARED ON. TELL ME IF YOU THINK THIS
14 IS ADEQUATE. IT WAS DESCRIBING CHURCH UNIVERSAL & TRIUMPHANT,"A
15 COMBINATION OF EASTERN THOUGHT, WESTERN THOUGHT, CHRISTIANITY,
16 ASTRAL PROJECTIONS, MYSTIC TELEPORTATION, REINCARNATION OF
17 SOULS, SCIENTIFIC JARGON THAT THEY ARE THE MASTER OF TAKING
18 WHAT IS MOST USEFUL FROM EVERY PLACE THAT IS POSSIBLY
19 IMAGINED." IS THAT ACCURATE?

20 A. TO THE BEST OF MY RECOLLECTION THAT IS. BUT I
21 CAN'T SAY BECAUSE I DON'T REMEMBER THAT PRECISELY.

22 Q. IN YOUR OPINION IS IT BAD THAT CHURCH UNIVERSAL &
23 TRIUMPHANT HAS TAKEN ASPECTS FROM DIFFERENT RELIGIONS AND
24 THOUGHT AND INCORPORATED IT INTO THEIR RELIGION?

25 A. WHAT CONCERNS ME IS THAT EVERY RELIGION IN MY
26 EXPERIENCE HAVING TAUGHT COMPARATIVE RELIGIONS REPRESENTS A
27 COHERENT RELIGIOUS APPROACH THAT ONE PIECE OF THE SYSTEM
28 INTERLOCKS WITH THE OTHER PIECE AND THAT THEY DO NOT CONFLICT

1 WITH EACH OTHER AND REPRESENT A COHERENT WHOLE. IN THE
2 EXPERIENCE THAT I HAVE HAD IN LOOKING AT CHURCH UNIVERSAL AND
3 OTHER RELIGIONS, I SEE A KIND OF ECLECTIC APPROACH IN WHICH I
4 SEE VARIOUS PIECES ALL BEING COMBINED TOGETHER FROM VARIOUS
5 PLACES. AND FOR ME FROM MY PERCEPTION AND MY STUDY IN THE
6 NATURE OF RELIGION THAT THAT DOES NOT REPRESENT A COHERENT
7 WHOLE, AND I FIND MYSELF SEEING THAT AS A MANIPULATIVE STYLE
8 AND APPROACH IN WHICH SOMEBODY CAN POINT TO IT AND SAY WELL
9 THERE IS SOMETHING JEWISH IN THIS AND THERE IS SOMETHING
10 CHRISTIAN IN THERE AND THERE IS SOMETHING BUDDHIST SO ANYBODY
11 CAN BELONG TO THIS WITHOUT HAVING TO CHANGE WHO THEY ARE.

12 Q. THE MERE FACT THAT THEY TAKE THINGS FROM DIFFERENT
13 RELIGIONS JUST THAT IN AND OF ITSELF YOU THINK IS A
14 MANIPULATIVE APPROACH?

15 A. WHEN IT'S COMBINED WITH THE REST OF THE MATERIAL I
16 TESTIFIED AT EARLIER THIS MORNING, THEN I DO SEE IT AS A
17 MANIPULATIVE APPROACH.

18 Q. WE WILL GET TO THE REST OF THAT. AM I CORRECT
19 YOU'RE NOT A PSYCHOLOGIST OR A PSYCHIATRIST?

20 A. NO.

21 Q. NOT A SOCIOLOGIST?

22 A. NO.

23 Q. WHEN YOU USE THE WORD "CULT," DO YOU USE IT WITH A
24 NEGATIVE CONNOTATION?

25 A. THE WORD "CULT" CAN BE APPLIED IN A NUMBER OF
26 WAYS. ONE IS A TECHNICAL TERM WHICH WOULD APPEAR EITHER IN A
27 DICTIONARY OR IN A SCHOLARLY JOURNAL APPLYING TO THE RITUALS
28 AND TECHNIQUES OF ANY PARTICULAR RELIGION. AND THERE IS CULT

1 AS A POPULAR TERM WHICH SEEKS TO DESCRIBE A SPECIFIC SOCIAL
2 PHENOMENON AND I USE IT IN THE LATTER FORM AS A POPULAR
3 DESCRIPTION DESCRIBING THE SOCIAL PHENOMENA. I DON'T
4 PARTICULARLY LIKE THE TERM. I THINK IT'S IMPRECISE. I THINK
5 IT IS ANOTHER WORD MOST PEOPLE RECOGNIZE. I DID NOT COIN IT.
6 IN THAT SENSE, IT'S USE WITH A NEGATIVE JUDGMENT.

7 Q YOU WOULD AGREE THAT CERTAIN ESTABLISHED RELIGIONS
8 WERE ONCE CONSIDERED CULTS, IS THAT A FAIR STATEMENT?

9 A. NO.

10 Q. ARE THERE ANY -- YOU HAVE HEARD THE TERM "NEW AGE
11 RELIGION, ALTERNATIVE RELIGION"?

12 A. OF COURSE.

13 Q. ARE THERE ANY OF THEM THAT YOU HAVE STUDIED THAT
14 YOU DO NOT CONSIDER TO BE CULTS?

15 A. SURE.

16 Q. WHY DON'T YOU NAME A FEW.

17 A. LET'S SEE. THEIR IS A GROUP AROUND A MAN NAMED
18 BUBBA FREEJOHN AND THERE IS A GROUP DEVISED AROUND SIKH
19 RELIGION WHICH I DO NOT SEE AS CULTS. THERE IS AN ORGANIZATION
20 IN SANTA MONICA CALLED -- THAT WAS A -- FOLLOWERS OF SWAMI
21 MUDANAMI; I'M NOT SURE THAT I SEE THOSE AS A CULT. THERE IS
22 SOME OF THE NEW WAIVE CHRISTIAN ORGANIZATIONS WHICH ARE VERY
23 FUNDAMENTALIST; I DON'T NECESSARILY SEE THEM AS CULTS EITHER.

24 Q. SOME OF THESE YOU HAVE SORT OF QUALIFIED SAYING I
25 DON'T NECESSARILY SEE THEM. IS THERE ANY DOUBT IN YOUR MIND AS
26 TO THE ONES YOU MENTIONED AS TO WHETHER THEY'RE CULTS OR NOT?

27 A. NO, NOT REALLY.

28 Q OTHER THAN THE ONES YOU MENTIONED ANY OTHERS THAT

1 YOU KNOW OF, NEW AGE RELIGIONS, THAT YOU DON'T CONSIDER CULTS?

2 A. DO YOU WANT A COMPLETE AND COMPREHENSIVE LIST? I
3 DON'T UNDERSTAND. YOU WANT MORE NAMES?

4 Q. YEAH.

5 A. LET'S SEE. THERE IS -- I AM NOT SURE -- I NEED TO
6 THINK FOR A MOMENT TO RESPOND TO THAT. I DID NOT COME PREPARED
7 WITH A LIST TO MAKE AN ANALYSIS BETWEEN THEM.

8 Q. AS YOU SIT HERE RIGHT NOW, CAN YOU THINK OF ANY
9 OTHERS?

10 A. THERE IS THE NEW SHEPHERDING MOVEMENTS IN
11 FUNDAMENTALIST CHRISTIANITY WHICH ARE NOT NECESSARILY CULTS.
12 THESE DON'T HAVE SPECIFIC NAMES TO THEM BUT THAT'S ANOTHER ONE.

13 Q. YOU SAY NOT NECESSARILY CULTS. ARE YOU QUALIFYING
14 THAT?

15 A. NO, I'M NOT QUALIFYING. THAT WOULD SIMPLY BE IN
16 TERMS OF MY OPINION. THERE ARE OTHER PEOPLE WHO MAY HAVE
17 DIFFERENT OPINIONS.

18 Q. YOUR OWN THEORIES AS TO CULTS WHICH YOU HAVE
19 EXPRESSED HERE TODAY, THIS MORNING, WERE THOSE DEVELOPED AS A
20 RESULT OF YOUR OWN COUNSELING?

21 A. THEY WERE DEVELOPED AS A RESULT OF MY COUNSELING
22 AND MY STUDY, DISCUSSING WITH MANY PEOPLE WHO HAD BEEN IN
23 CULTS, THOSE WHO WERE DOING SIMILAR KIND OF WORK THAT I HAVE
24 BEEN DOING. IT'S A COMPILATION OF A VARIETY OF EXPERIENCES
25 FROM A NUMBER OF PEOPLE OVER MANY YEARS. IT'S NOT TOTALLY MY
26 OWN.

27 Q. WHEN DID YOU BEGIN YOUR COUNSELING? WHAT YEAR?
28 DO YOU RECALL?

1 A. I BELIEVE I FIRST BECAME INVOLVED IN DEALING WITH
2 THIS PHENOMENA SOMETIME IN THE LATE 60'S, '68, '69, WHILE I WAS
3 IN CINCINNATI.

4 Q. CAN YOU GIVE US SOME IDEA AS TO WHEN THE THEORIES
5 WHICH YOU EXPRESSED TO US THIS MORNING WHEN THEY BEGAN TO
6 FORMULATE IN A FORM THAT WAS RELATIVELY CLOSE TO WHAT YOU
7 TESTIFIED TO THIS MORNING.

8 A. I'D SAY PROBABLY '73, '74, '75, SOMEWHERE IN THE
9 EARLY MIDDLE 70'S I BEGAN TO HAVE A BROADER CONCEPTUALIZATION
10 OF THE PHENOMENA RATHER THAN SIMPLY JUST INDIVIDUAL GROUPS.

11 Q. IN FORMULATING YOUR THEORIES, WERE THERE CERTAIN
12 NEW AGE RELIGIONS THAT YOU HAD INTERVIEWED IN A
13 DISPROPORTIONATE AMOUNT WHERE YOU HAD A LOT MORE INPUT FROM A
14 PARTICULAR GROUP DURING THE YEARS UP TO '73, '74, '75 WHEN YOU
15 MIGHT HAVE FORMULATED YOUR THEORIES?

16 A. WELL, IN THE EARLY FORMULATION, I WOULD SAY THAT
17 THERE WERE PROBABLY MORE GROUPS -- THERE WAS PROBABLY FEWER
18 GROUPS WITH GREATER LEVEL OF KNOWLEDGE BECAUSE OF THEIR
19 ACCESSIBILITY.

20 Q. SO THERE WERE FEWER GROUPS AND YOU KNEW A LOT
21 ABOUT THOSE BECAUSE YOU HAD COUNSELED A LOT OF PEOPLE FROM
22 THOSE GROUPS?

23 A. PARTIALLY.

24 Q. WAS CHURCH UNIVERSAL ONE OF THOSE GROUPS?

25 A. IN THE LATER YEARS OF THAT SOME.

26 Q. I'M TALKING ABOUT UP TO '73, '74, '75 WHEN YOU
27 FIRST HAD A FORMULATION OF THE THEORIES THAT IS CLOSE TO WHAT
28 YOU HAVE TOLD US TODAY. AT THAT POINT HAD YOU STUDIED CHURCH

1 UNIVERSAL & TRIUMPHANT?

2 A. I'M NOT SURE. I THINK I HAD HAD SOME INFORMATION
3 THAT I HAD READ AND THINGS I HAD HEARD, BUT I'M NOT SURE THAT I
4 HAD ANY DIRECT CONTACT BY THEN.

5 Q. WITH RESPECT TO THE THEORIES THAT YOU FORMULATED
6 AND EXPRESSED THIS MORNING, IS IT YOUR BELIEF THAT MR. MULL
7 FITS RIGHT INTO THE MOLD OR DO YOU HAVE TO CHANGE THE MOLD A
8 LITTLE OR A LOT IN ORDER FOR HIM TO FIT IN THERE?

9 MR. LEVY: I WILL OBJECT TO THE QUESTION, YOUR HONOR, AS
10 VAGUE AND AMBIGUOUS.

11 THE COURT: SUSTAINED.

12 Q BY MR. KLEIN: CAN YOU GIVE US SOME IDEA IN THE
13 COUNSELING THAT YOU HAVE DONE OVER THE YEARS AS TO WHAT
14 PERCENTAGE OF THE PEOPLE YOU COUNSELED WOULD BE 25 OR YOUNGER?

15 A. I'D SAY PROBABLY 50 TO 60 PERCENT.

16 Q. WHAT PERCENTAGE WOULD BE 50 OR OVER?

17 A. PROBABLY THE MAJORITY OF THE REST SINCE THAT SEEMS
18 TO BE THE BREAKDOWN, AT LEAST AS I WAS EXPERIENCING IT OR FROM
19 45 AND ABOVE.

20 Q. YOU SAY THE MAJORITY OF THE REST. CAN YOU GIVE ME
21 SOME IDEA OF WHAT PERCENTAGE OF ALL THE PEOPLE YOU COUNSELED
22 WERE OVER 50?

23 A. 30, 35 PERCENT.

24 Q. HOW MANY PEOPLE HAVE YOU COUNSELED IN THE YEARS
25 YOU HAVE BEEN COUNSELING PEOPLE PERTAINING TO THESE NEW AGE
26 RELIGIONS?

27 A. DO YOU MEAN JUST INDIVIDUALS WHO ARE INVOLVED OR
28 DO YOU MEAN ALL THE PEOPLE WHO WERE INVOLVED WITH THEIR

1 INVOLVEMENT?

2 Q. JUST THE ONES INVOLVED.

3 A. I'D SAY PROBABLY WELL OVER 300, COULD BE AS HIGH
4 AS FIVE. I HAVE NOT KEPT A RUNNING TALLY.

5 Q. HOW MANY PEOPLE HAVE YOU COUNSELED WHO HAD BEEN OR
6 WERE MEMBERS OF CHURCH UNIVERSAL & TRIUMPHANT?

7 A. A HANDFUL, HALF A DOZEN.

8 Q. SIX PEOPLE?

9 A. UH-HUH.

10 Q. MR. MULL WAS ONE OF THOSE, I TAKE IT?

11 A. UH-HUH.

12 Q. CAN YOU TELL US THE NAMES OF THE OTHERS?

13 A. NO, I WOULD NOT.

14 Q. THEY WERE CONFIDENTIAL --

15 A. OF COURSE.

16 Q. -- COUNSELING?

17 MY POINT IS YOU DIDN'T -- ARE YOU INCLUDING IN
18 THAT HALF DOZEN SOMEBODY YOU MIGHT HAVE SPOKEN TO TO TELL YOU
19 ABOUT MR. MULL, TO TELL YOU ABOUT SOMEONE ELSE?

20 A. NO. I ASSUMED YOUR QUESTION RELATES TO PEOPLE WHO
21 WERE SPECIFICALLY INVOLVED, WHO WERE MEMBERS.

22 Q. YOU MIGHT HAVE TALKED TO A MEMBER OR AN EX-MEMBER
23 TO TELL YOU ABOUT MR. MULL. WHY DON'T YOU INCLUDE THAT IN THE
24 NUMBER YOU GIVE ME. DOES THAT INCREASE THE NUMBER?

25 A. THAT WOULD INCREASE THE NUMBER.

26 Q. HOW MANY MEMBERS OR EX-MEMBERS OF CHURCH UNIVERSAL
27 HAVE YOU SPOKEN TO?

28 A. MAYBE THAT NUMBER SIX WOULD GO UP TO EIGHT OR

1 NINE.

2 Q. AND OTHER THAN TALKING TO THOSE NINE PEOPLE, WHAT
3 ELSE HAVE YOU DONE IN ORDER TO LEARN ABOUT CHURCH UNIVERSAL &
4 TRIUMPHANT?

5 A. IN THE LATE 70'S — AND I DO NOT — I HAVE TRIED
6 TO REACH BACK TO FIND THE EXACT YEAR. AND I WENT TO A NUMBER
7 OF LECTURES GIVEN BY ELIZABETH CLARE PROPHET, AND THEN I BEGAN
8 JUST READING WHATEVER MATERIAL I COULD GET; SOME MATERIAL,
9 MANUALS, ET CETERA, WERE GIVEN TO ME FROM PEOPLE WHO HAD COME
10 OUT. THERE WERE TRANSCRIPTIONS OF SOME OF HER LECTURES WHICH
11 PEOPLE RECORDED; AT OTHER TIMES CONVERSATIONS WITH PEOPLE WHO
12 WERE INVOLVED IN THE GROUP, ET CETERA.

13 Q. YOU SAID CONVERSATIONS WITH PEOPLE INVOLVED IN THE
14 GROUP. DID YOU HAVE ANY CONVERSATIONS WITH PEOPLE WHO AT THE
15 TIME YOU HAD THE CONVERSATIONS WITH THEM WERE CHURCH MEMBERS?

16 A. SEVERAL.

17 Q. WAS THAT COUNSELING? WERE YOU COUNSELING THEM?

18 A. THEY CAME TO TALK TO ME. I WAS NOT COUNSELING.
19 THEY HAD HEARD ME GIVE A LECTURE OR TESTIFY IN OTHER SITUATIONS
20 AND HAD APPROACHED ME AFTERWARDS AND ASKED IF THEY COULD TALK
21 TO ME AND I SAID YES. BUT I WOULD — THEY DID NOT COME TO
22 ORIGINALLY ASK FOR COUNSELING, THOUGH IT ENDED UP IN THAT
23 LATER.

24 Q. HAVE YOU TOLD ME NOW ALL OF THE INFORMATION THAT
25 WAS AVAILABLE TO YOU PRIOR TO TESTIFYING TODAY ABOUT CHURCH
26 UNIVERSAL & TRIUMPHANT OR IS THERE ANYTHING ELSE?

27 A. NO, THAT WOULD BE IT. OH, NO. ONE ADDITIONAL
28 PIECE AND THAT'S WHEN THE TELEVISION PROGRAM THAT YOU REFERRED

1 TO IN THE -- AND MY QUOTE WAS MADE, THE PEOPLE WHO DID THE NEWS
2 PIECE CAME AND SPOKE TO ME BROUGHT ME SOME MATERIAL AND
3 VIDEOTAPES, OTHER THINGS WHICH I SAW.

4 Q. THE MATERIAL YOU READ, CAN YOU TELL US WHAT BOOKS
5 YOU READ OR MATERIAL YOU READ?

6 A. MOST OF WHAT I READ WERE XEROXES OR COPIES SO I
7 DID NOT HAVE THE TOTAL BOOKS. I WAS INFORMED BY THE PEOPLE WHO
8 GAVE THEM TO ME WHO CAME FROM THE ORGANIZATION THAT THEY WERE
9 MANUALS, INSTRUCTIONS, TEACHINGS, ET CETERA AND I SAID THE
10 OTHERS WERE TRANSCRIPTS OF PRESENTATIONS.

11 Q. CAN YOU TELL ME WHAT THE PRESENTATIONS -- THE
12 SUBJECT MATTERS OF THE PRESENTATION THAT YOU READ TRANSCRIPTS
13 OF?

14 A. LECTURES, DECREERING, ET CETERA, THINGS THAT PEOPLE
15 EXPERIENCE WHILE THEY WERE EITHER IN INTRODUCTORY LECTURES OR
16 INTRODUCTORY PROGRAMS OR ELSE WERE MEMBERS OF THE ORGANIZATION
17 AND DOING WHATEVER THEY DID AT SUMMIT UNIVERSITY, ET CETERA.

18 Q. OF THE EIGHT OR NINE PEOPLE WHO WERE OR HAD BEEN
19 CHURCH UNIVERSAL MEMBERS, HOW MANY OF THEM WERE NO LONGER
20 MEMBERS AT THE TIME YOU SPOKE TO THEM?

21 A. WELL, OF THE ORIGINAL SIX WHO I SPOKE TO, I WOULD
22 SAY THREE, THREE OR FOUR. I'M NOT POSITIVE BECAUSE ONE WAS IN
23 THE PROCESS OF TRANSITION. ABOUT HALF AND HALF. THAT WAS OVER
24 A PERIOD OF SOME YEARS SO IT'S HARD FOR ME TO REMEMBER
25 PRECISELY.

26 Q. SO HALF OF THEM, OF THE SIX PEOPLE, HAD BEEN --
27 WERE MEMBERS WHEN THEY SPOKE TO YOU AND HALF WERE NOT?

28 A. YEAH, HAD LEFT.

1 Q. AND OF THE OTHERS I GUESS WE HAVE GOT TWO OR THREE
2 MORE TO GET EIGHT TO NINE. WERE THEY MEMBERS OR EX-MEMBERS?

3 A. THEY WERE EX-MEMBERS, BUT I DID NOT PARTICIPATE IN
4 THEIR DISCUSSIONS. THEY MADE COMMENTS TO ME EITHER ABOUT OTHER
5 EX-MEMBERS OR ABOUT MR. MULL.

6 Q. SO, AM I CORRECT THAT OF THE EIGHT OR NINE PEOPLE
7 YOU SPOKE TO APPROXIMATELY SIX WERE EX-MEMBERS AND THREE WERE
8 MEMBERS?

9 A. APPROXIMATELY. THERE WAS ALSO ONE OTHER AREA OF
10 INFORMATION WHICH I NEGLECTED AND THAT WAS A CULT CLINIC AT THE
11 TASK FORCE ON CULTS AND MISSIONARIES DEALT WITH A NUMBER OF
12 PEOPLE, THE EXACT NUMBER I DON'T KNOW. THE RECORDS THAT THEY
13 ESTABLISHED ALSO GAVE ME LEARNING MATERIAL ABOUT THE NATURE OF
14 THE ORGANIZATION AS PERCEIVED BY THOSE WHO WERE MEMBERS.

15 Q. WHAT YOU'RE SAYING IS YOU HAD MATERIAL WHERE
16 OTHERS HAD WRITTEN THINGS DOWN AND YOU READ THAT MATERIAL?

17 A. YEAH. AND WE ALSO DISCUSSED THEM AT LENGTH.

18 Q. BUT YOU DID NOT PERSONALLY GATHER THE INFORMATION
19 YOURSELF, IS THAT TRUE?

20 A. NO.

21 Q. SO YOU HAVE TO ACCEPT THEIR WORD AND CREDIBILITY
22 AS FAR AS THE ACCURACY OF -- THAT OTHER MATERIAL; IS THAT
23 RIGHT?

24 A. ON THE BASIS OF THE PEOPLE THAT DID THE WORK, I
25 WOULD ACCEPT THEIR ACCURACY.

26 Q. NOW, OF THE THREE MEMBERS THAT YOU SPOKE TO, HOW
27 LONG DID YOU SPEAK TO THESE THREE MEMBERS TOTAL, THE THREE OF
28 THEM, ANY IDEA?

1 A. HOURS EACH ONE HOW MANY EXACTLY I DON'T REMEMBER
2 AND SOMETIMES THEY WERE MULTIPLE MEETINGS, SOMETIMES THEY WERE
3 PHONE CALLS, AND I WOULD NOT LOG THEM SO I COULDN'T TELL YOU.

4 Q DO YOU KNOW HOW MANY MEMBERS CHURCH UNIVERSAL HAS
5 IN THE L.A. AREA?

6 A. NO, NOT TOTAL.

7 Q. DO YOU THINK THAT IT WOULD HAVE ENHANCED THE VALUE
8 OF YOUR RESEARCH IF YOU WOULD HAVE TRIED TO CONTACT MORE THAN
9 THREE PEOPLE WHO WHEN THEY SPOKE TO YOU WERE ACTUALLY CHURCH
10 MEMBERS.

11 MR. LEVY: I'M GOING TO OBJECT TO THE QUESTION. IT
12 CALLS FOR A CONCLUSION. IT'S SELF-SERVING.

13 THE COURT: HE CAN ANSWER IT.

14 THE WITNESS: I FELT RELATIVELY SATISFIED WITH THE
15 INFORMATION I WAS GETTING AND ITS SOURCES. ONE OF THE THINGS I
16 HAD HEARD -- AND I HAD THOUGHT ABOUT MAKING SOME CONTACT, BUT I
17 HAD BEEN INFORMED THAT THE ORGANIZATION WAS DECREERING AGAINST
18 ME SO I DIDN'T FEEL QUITE COMFORTABLE GOING THERE AND
19 EXPLORING.

20 Q. WHO DID YOU HEAR THAT FROM?

21 A. FROM THE PEOPLE WHO DID THE TELEVISION SHOW.

22 Q. THOSE WERE PEOPLE -- THE ONES WHO DID THE
23 TELEVISION SHOW WERE PEOPLE WHO WERE EX-CHURCH MEMBERS?

24 A NO. NO. THEY WERE REPORTERS FOR A TELEVISION
25 STATION.

26 Q SO YOU HEARD IT FROM A REPORTER WHO OBVIOUSLY HAD
27 HEARD IT FROM AT LEAST ONE OTHER PERSON, IF NOT MORE THAN ONE
28 OTHER PERSON, IN THE LINE OF COMMUNICATION?

1 A. NOT NECESSARILY. BUT THAT WAS THE REPORT AND I
2 ACCEPTED IT AS VALID ENOUGH TO BE CONCERNED.

3 Q. SO I TAKE IT THAT YOU NEVER CALLED UP ELIZABETH
4 CLARE PROPHET AND SAID CAN I COME AND TALK TO YOU ABOUT YOUR
5 ORGANIZATION?

6 A. NO.

7 Q. DO YOU THINK THAT CALLING ELIZABETH CLARE PROPHET
8 AND ASKING HER IF YOU COULD SPEAK TO HER ABOUT THE CHURCH, ITS
9 RITUALS THAT THAT MIGHT HAVE ENHANCED THE VALUE OF YOUR
10 RESEARCH AND THE RESULTS YOU REACHED?

11 A. NO. I WOULD NOT HAVE EXPECTED TO RECEIVE THE
12 ANSWER TO THE QUESTIONS I WOULD HAVE ASKED.

13 Q. YOU ASSUMED THAT SHE WOULD NOT HAVE GIVEN YOU
14 ANSWERS TO THE QUESTIONS?

15 A. ON THE BASIS OF THE INFORMATION THAT I HAD FROM
16 THE VARIOUS MEMBERS AND MY COMMUNICATIONS WITH MR. MULL, I HAD
17 ARRIVED AT THAT CONCLUSION.

18 Q. WHEN YOU MET WITH MR. MULL, WOULD IT BE FAIR TO
19 SAY THAT HE WAS SOMEWHAT ANGRY AT THE CHURCH?

20 A. AT THE TIME I SPOKE WITH HIM, NO. HE WAS IN GREAT
21 PAIN AND VERY SAD. I THINK HE WAS AT A LOSS. I HAVE NEVER
22 EXPERIENCED FROM MR. MULL GREAT MOMENTS OF ANGER.

23 Q. WHEN DID YOU FIRST SPEAK WITH MR. MULL, WHAT YEAR?

24 A. WELL, IT WAS SEVERAL YEARS AGO. AGAIN I DON'T
25 REMEMBER THE EXACT DATE. IT WAS NOT A LONG OR INTENSE
26 CONFESSION. THE MOST INTENSE CONVERSATION WAS SEVERAL MONTHS
27 AGO.

28 Q. SEVERAL YEARS AGO ARE WE TALKING 1984?

1 A. '83, '84.

2 Q. IN 1983, 1984 IT WAS YOUR OPINION AFTER TALKING TO
3 MR. MULL THAT HE WASN'T ANGRY WITH THE CHURCH?

4 A. I SAID MY EXPERIENCE OF HIM WAS THAT HE WAS NOT.
5 WHAT HE EXPRESSED TO ME AT OTHER TIMES WAS THAT WHEN THE CHURCH
6 ATTEMPTED TO COERCE HIM AFTER LEAVING HE THEN BECAME ANGRY WITH
7 THEM AND TOLD THEM TO LEAVE HIM ALONE.

8 Q. WHEN YOU SPOKE TO HIM IN 1983 OR '84, HOW MANY
9 HOURS DID YOU SPEAK TO HIM?

10 A. I DON'T KNOW. MAYBE AN HOUR.

11 Q. WHEN DID YOU NEXT SPEAK TO HIM?

12 A. NOT FOR SEVERAL YEARS UNTIL A MONTH AGO,
13 APPROXIMATELY.

14 Q. WHEN DID YOU FORM YOUR OPINION WITH RESPECT TO
15 MR. MULL THAT YOU TESTIFIED TO THIS MORNING?

16 A. THE LAST SERIES OF CONVERSATIONS THAT WE HAD A
17 MONTH AGO.

18 Q. HOW LONG DID YOU SPEAK TO HIM WHEN YOU SPOKE TO
19 HIM A MONTH AGO?

20 A. SEVERAL HOURS.

21 Q. TWO HOURS?

22 A. CLOSER TO THREE.

23 Q. SO WITH RESPECT TO ACTUALLY INTERVIEWING MR. MULL
24 TO THE EXTENT THAT THAT HELPED YOU TO FORM YOUR CONCLUSIONS
25 THAT YOU TESTIFIED THIS MORNING WE'RE TALKING ABOUT FOUR HOURS
26 OF INTERVIEWS OF ACTUAL YOU AND HIM TOGETHER IN A ROOM?

27 A. APPROXIMATELY.

28 Q. WAS MR. LEVY HIS ATTORNEY PRESENT WHEN YOU SPOKE

1 TO HIM ON THOSE TWO OCCASIONS?

2 A. SECOND OCCASION.

3 Q. THREE HOUR ONE?

4 A. YES.

5 Q. DID MR. LEVY HAVE ANYTHING TO SAY DURING THE
6 COURSE OF THAT CONVERSATION?

7 A. VERY LITTLE.

8 Q. DO YOU THINK THAT FOUR HOURS OF DIRECT
9 COMMUNICATION BETWEEN YOU AND MR. MULL WAS A SUFFICIENT
10 BASIS — AND I UNDERSTAND YOU SAID THAT YOU READ OTHER THINGS
11 AND YOU HAVE SEEN OTHER THINGS. BUT I'M TALKING JUST ABOUT
12 DIRECT COMMUNICATION. WAS FOUR HOURS OF DIRECT COMMUNICATION
13 SUFFICIENT FOR YOU TO FORM THE CONCLUSION THAT YOU DID THIS
14 MORNING?

15 A. OF COURSE. I WOULD NOT HAVE ARRIVED AT THEM IF I
16 HAD NOT THOUGHT SO. THE EXTENT OF MR. MULL'S DISTRESS AND HIS
17 PAIN, THE CLARITY WITH WHICH HE EXPRESSED HIMSELF TO ME, HIS
18 WILLINGNESS TO ANSWER QUESTIONS THAT WERE VERY PROBING AND VERY
19 PAINFUL, MY STYLE AT WHICH I INTERVIEWED HIM IN WHICH I EVEN
20 TRIED TO CREATE SITUATIONS IN WHICH HE MIGHT ANSWER DIFFERENT
21 QUESTIONS IN DIFFERENT WAYS SHOWED ME THAT HE HAD A DEEP SENSE
22 AND UNDERSTANDING OF WHAT WAS GOING ON AND I WAS ABLE TO PICK
23 UP CLEARLY FROM HIM IN MY OWN OPINION AN UNDERSTANDING OF WHAT
24 HIS SITUATION WAS. SO I FEEL VERY COMFORTABLE WITH THAT AMOUNT
25 OF TIME SPENT WITH HIM.

26 Q. DID HE HAVE ANY PROBLEMS REMEMBERING ANYTHING WHEN
27 YOU SPOKE TO HIM A MONTH AGO AS FAR AS THE FACTS OF THIS CASE?

28 A. NOT THAT I NOTICED.

1 Q. DURING YOUR RESEARCH INTO MR. MULL AND THE FACTS
2 OF THIS CASE THAT ALLOWED YOU TO REACH YOUR OPINION TO WHICH
3 YOU TESTIFIED THIS MORNING, DID YOU READ THE LETTERS THAT
4 MR. MULL WROTE TO THE CHURCH DURING THE COURSE OF HIS
5 AFFILIATION. DID YOU READ ANY OF THOSE?

6 A. YES, I READ THE LETTER IN WHICH HE SENT TO
7 ELIZABETH CLARE PROPHET DEMANDING THAT HE BE LEFT ALONE.

8 Q. IS THAT THE ONLY LETTER YOU READ?

9 A. IN MY UNDERSTANDING, I THINK THERE WAS THAT AND
10 THERE MAY HAVE BEEN ONE ADDITIONAL ONE IN THE TESTIMONY. BUT I
11 PRIMARILY REMEMBER THAT PARTICULAR LETTER.

12 Q. IF I WERE TO TELL YOU THAT THERE WERE 15 OR 20
13 LETTERS THAT WERE WRITTEN BY MR. MULL, SAY, FROM 1975 TO 1980
14 TO ELIZABETH CLARE PROPHET OR OTHER CHURCH OFFICIALS, WOULD YOU
15 THINK THAT IT WOULD BE HELPFUL IN ORDER FOR YOU TO COME OUT
16 WITH AN ACCURATE CONCLUSION FOR YOU TO HAVE READ THOSE LETTERS?

17 A. IT MIGHT HAVE BEEN IF I WAS TOLD THAT THE LETTERS
18 WERE AVAILABLE AND I COULD READ THEM. I WOULD HAVE BEEN MORE
19 THAN HAPPY TO READ THEM. THEY WERE NOT — I WAS NOT TOLD THAT
20 THEY WERE AVAILABLE OTHERWISE I WOULD HAVE OR IF THEY ARE
21 AVAILABLE.

22 Q. MR. MULL WAS DEPOSED ON SIX SEPARATE DAYS IN, I
23 GUESS, THE END OF 1984 THE BEGINNING OF 1985, DID YOU READ ANY
24 OF THOSE SIX VOLUMES OF DEPOSITION TESTIMONY?

25 A. I WAS GIVEN SOME SUMMARY. I DID NOT READ ALL OF
26 THE DEPOSITIONS.

27 Q. WOULD THERE BE ANY WAY THAT YOU WOULD KNOW WHETHER
28 SOMETHING THAT MR. MULL TOLD YOU WHEN YOU MET HIM A MONTH AGO,

1 SPOKE TO HIM FOR THREE HOURS, WAS INCONSISTENT WITH THE FACTS
2 AS HE RELATED IN HIS DEPOSITION TAKEN IN '84 AND THE BEGINNING
3 OF '85?

4 A. OF COURSE NOT. I WOULD HAVE TO RELY ON MY OWN
5 SENSES OF PERCEPTION WITH MR. MULL AND THE DATA THAT I WAS
6 PROVIDED. IN THAT SENSE MY CONVERSATIONS WITH MR. MULL LED ME
7 TO FEEL THAT WHAT HE WAS DESCRIBING TO ME WAS ACCURATE IN TERMS
8 OF HIS OWN EXPERIENCE AND HIS OWN PERCEPTIONS.

9 Q. WHEN YOU SAY THAT YOU CONCLUDED THAT WHAT HE TOLD
10 YOU WAS ACCURATE IN TERMS OF HIS OWN PERCEPTIONS DO PEOPLE
11 SOMETIMES AFTER A NUMBER OF YEARS OF STRESSFUL TYPE SITUATIONS
12 DO THEY SOMETIMES START BELIEVING A VERSION OF EVENTS WHICH IS
13 REALLY A FIGMENT OF THEIR IMAGINATION? HAVE YOU EVER HAD THAT
14 HAPPEN?

15 A. I HAVE SEEN THAT IN PEOPLE WITH SEVERE
16 DISTURBANCES, OF COURSE.

17 Q. IN OTHER WORDS, YOU START THINKING ABOUT IT AND
18 THINKING ABOUT IT AND AFTER A COUPLE OF YEARS YOU REALLY
19 BELIEVE IT THE WAY YOU THOUGHT ABOUT IT INSTEAD OF THE WAY IT
20 HAPPENED. YOU HAVE SEEN THAT HAPPEN?

21 A. SURE, OF COURSE.

22 Q. DO YOU HAVE CERTAIN CHECKS IN YOUR INTERVIEW TO
23 INSURE THAT THAT'S NOT WHAT'S HAPPENING WHEN YOU SPEAK TO
24 SOMEBODY LIKE MR. MULL?

25 A. OF COURSE.

26 Q. WHAT DO YOU DO TO CHECK THAT?

27 A. WHAT I DO IS I ASK A SERIES OF QUESTIONS IN ORDER
28 TO ASCERTAIN NOT ONLY FACTS BUT EMOTIONAL CLIMATE AND EMOTIONAL

1 RESPONSES TO THE SITUATION, ALSO HAVE THE INDIVIDUAL EXPRESS
2 THEIR FEELINGS ABOUT WHAT IT IS THEY'RE DESCRIBING. I THEN
3 FILE THAT DATA AWAY IN THE INTERVIEW THEN I GO ON TO A TOTALLY
4 DIFFERENT SUBJECT. THEN IN THE PROCESS OF A DISCUSSION ABOUT
5 ANOTHER TOPIC, I WILL THROW IN A QUESTION ABOUT THE PRIOR PIECE
6 OF INFORMATION THAT THE PERSON WOULD NOT BE PREPARED FOR AND
7 SEE WHAT KIND OF ANSWER I GET, WHETHER IT'S COHERENT WITH OR
8 DIFFERENT FROM, EITHER THE SAME CONTENT, THE SAME EMOTIONAL
9 RESPONSE OR THE SAME FEELING TONE. IF I GET A DIFFERENT SET OF
10 RESPONSES, THEN I WILL LET IT PASS, I WILL GO ON A LITTLE
11 LONGER COME BACK TRY TO HIT AT IT ANOTHER WAY. IF I GET A
12 NUMBER OF DIFFERENT RESPONSES, THEN I DOUBT IF WHAT I'M HEARING
13 IS CREDIBLE.

14 Q. WHEN YOU SPOKE TO HIM, I TAKE IT THAT MUCH OF WHAT
15 YOU SPOKE TO HIM ABOUT INVOLVED THINGS THAT OCCURRED IN 1975
16 THROUGH 1980, IS THAT TRUE?

17 A. SOME, YES.

18 Q. WITH RESPECT TO ANYTHING HE SAID THAT OCCURRED IN
19 1975 TO 1980, WOULDN'T IT BE MORE ACCURATE FOR YOUR RESEARCH TO
20 HAVE READ OVER ALL THESE LETTERS WHERE HE'S DESCRIBING IN THE
21 LETTERS WRITTEN DURING THOSE YEARS WHAT HE SEES WHAT'S
22 HAPPENING TO HIM TO KNOW WHAT HE'S SAID IN THE LETTERS TO
23 COMPARE TO WHAT HE'S SAYING TO YOU AS OPPOSED TO THE CHECK
24 SYSTEM YOU HAVE JUST DESCRIBED?

25 A. NOT NECESSARILY. FIRST OF ALL MY ROLE AS AN
26 EXPERT WITNESS IS TO SPEAK ABOUT THE CURRENT CONDITION OF
27 MR. MULL AND HOW HE GOT THERE. THE MINUTIA OF INFORMATION
28 ABOUT SPECIFIC DISCUSSIONS WERE NOT AS IMPORTANT TO ME AS THE

1 PROCESS THAT HE WENT THROUGH, WHETHER I COULD IDENTIFY THAT
2 PROCESS AND ITS CONSEQUENCES WITH THE KIND OF CLARITY THAT LEFT
3 ME WITH CERTAINTY ABOUT THE NATURE OF THE DAMAGE AND THE
4 DISTRESS HE HAD GONE UNDER, NUMBER ONE.

5 NUMBER TWO, WHAT WAS VERY IMPORTANT TO ME WAS
6 MR. MULL'S CURRENT SITUATION, HIS HERE AND NOW STATE AS IT
7 RELATED TO THE SITUATION HE WAS UNDER IN STRESS WITH THE CHURCH
8 AND GOING THROUGH THE TRIAL, ET CETERA. I WAS NOT HERE TO TEST
9 THE VERACITY OF SPECIFIC INCIDENTS BUT RATHER TO DEAL WITH THE
10 OVERALL GENERAL CHARACTERISTIC OF WHAT HAD HAPPENED TO MR. MULL
11 AND WHERE HE WAS NOW.

12 Q. FOR EXAMPLE, DURING THE COURSE OF YOUR TESTIMONY,
13 I KNOW YOU TALKED ABOUT THE AMOUNT OF HOURS HE SPENT WORKING.
14 HOW MANY HOURS DID HE TELL YOU HE SPENT WORKING WHEN HE WAS
15 WITH THE CHURCH?

16 A. YOU MEAN OVER THE YEARS OR DAILY OR WEEKLY OR
17 MONTHLY?

18 Q. I KNOW ONE OF THE THINGS YOU MENTIONED WERE THE
19 LONG HOURS. WHAT WERE YOU REFERRING TO?

20 A. WHAT HE DESCRIBED TO ME WAS HE WOULD GET UP VERY
21 EARLY IN THE MORNING, THAT THERE WOULD BE DECREEING, THAT HE
22 WOULD GO TO WORK, HE WOULD GO TO CLASSES, HE WOULD COME BACK,
23 THERE WOULD BE LUNCH, THERE WOULD BE DECREEING, HE WOULD GO TO
24 DINNER, DECREEING, WORK, ET CETERA. AS THE TIME PASSED THERE
25 WAS MORE TIME SPENT IN WORK AND LESS AND LESS TIME SPENT IN
26 CLASSES. HE DESCRIBED IT FOR HIMSELF IN HIS OWN
27 SELF-DEFINITION OF LONG HOURS OF WORK OFFSET AGAINST LONG HOURS
28 OF EITHER DECREEING OR LEARNING.

1 MY DEFINITION OF WHAT'S LONG FOR ME IS DIFFERENT
2 THAN WHAT'S LONG FOR HIM. A MAN AT HIS AGE AND AT HIS
3 PARTICULAR PLACE IN LIFE HE FELT WHAT HE WAS DOING WAS
4 STRESSFUL. I WAS WILLING TO ACCEPT THAT ON THE BASIS OF THE
5 WAY HE DESCRIBED HIS PHYSICAL AND MENTAL STATE DURING THAT
6 PERIOD.

7 Q DID HE TELL YOU HOW MANY HOURS HE WORKED ON AN
8 AVERAGE DAY WHEN HE WAS WITH THE CHURCH?

9 A. NO, NOT SPECIFICALLY. AND IT SEEMED TO VARY ON
10 THE BASIS OF THE PROGRAM HE WAS IN.

11 Q. I'M NOT QUITE UNDERSTANDING WHAT HE SAID WHEN YOU
12 CONCLUDE HE WORKED LONG HOURS. SIMPLY MR. MULL CONCLUDED HE
13 WORKED LONG HOURS?

14 A. ACCORDING TO HIS REPORT IT WAS. SOMETIMES THE --
15 I BELIEVE -- THOUGH I CAN'T BE SURE -- HIS DEFINITION OF LONG
16 HOURS WOULD NOT ONLY INCLUDE THE WORK HE DID AT THE DRAFTING
17 BOARD WHICH FREQUENTLY WENT LATE INTO THE NIGHT BUT ALSO THE
18 DECREEING THAT WENT ON AS PART OF THAT.

19 Q WHEN HE TOLD YOU THAT HIS WORK WENT ON LATE INTO
20 THE NIGHT, WHAT DID YOU HAVE TO CHECK AND FIND OUT IF IN FACT
21 IT REALLY DID GO ON LATE INTO THE NIGHT?

22 A. NOTHING. I ACCEPTED MR. MULL'S WORD.

23 Q. WHEN -- DID HE TELL YOU HOW MANY HOURS A DAY HE
24 DECREEED?

25 A. ON THE BASIS OF WHAT I CALCULATED APPROXIMATELY
26 FOUR TO SIX, SOMETIMES EIGHT.

27 Q. WHAT DID YOU HAVE TO CHECK WHETHER IN FACT HE DID
28 DO FOUR TO SIX OR EIGHT HOURS OF DECREEING?

1 A. ON THE BASIS OF WHAT I HAD BEEN TOLD BY PEOPLE WHO
2 HAD BEEN IN THE ORGANIZATION PRIOR. AND IT SOUNDED REASONABLE
3 AND ACCEPTABLE IN TERMS OF WHAT WE HAD COME TO KNOW ABOUT THE
4 THE NATURE OF THE ORGANIZATION.

5 Q. TALKING NOW ABOUT THOSE FIVE EX-MEMBERS AND TWO OR
6 THREE MEMBERS?

7 A. AND OTHER REPORTS FROM OTHER EX-MEMBERS AND PEOPLE
8 WHO HAD SPOKEN TO PEOPLE LIKE MYSELF IN SIMILAR SITUATIONS IN
9 WHICH WE SHARE INFORMATION AND POOL OUR KNOWLEDGE IN ORDER TO
10 ARRIVE AT A BROADER SENSE OF UNDERSTANDING.

11 Q. BUT THOSE OTHER PEOPLE WHEN THEY TOLD YOU THE
12 OTHER HOURS OF DECREEING, FOR EXAMPLE, NONE OF THEM REFERRED TO
13 WHAT MR. MULL SPENT AS DECREEING, THEY TOLD YOU WHAT THEIR
14 EXPERIENCE WAS, CORRECT?

15 A. CORRECT.

16 Q. AS FAR AS BELIEVING THAT MR. MULL ACTUALLY SPENT
17 FOUR, SIX, OR EIGHT HOURS YOU BASED THAT ON WHAT MR. MULL TOLD
18 YOU?

19 A. CORRECT.

20 Q. YOU ALSO MENTIONED SOMETHING ABOUT THE POOR DIET
21 AS BEING INVOLVED IN THIS MANIPULATION. FIRST OF ALL I TAKE IT
22 YOU'RE NOT A NUTRITION EXPERT IN ANY WAY; IS THAT RIGHT?

23 A. NO.

24 Q. ARE YOU A NUTRITION EXPERT?

25 A. I SAID NO.

26 Q. MY FAULT. I PHRASED THE QUESTION BADLY.

27 ON WHAT DID YOU CONCLUDE THAT MR. MULL WAS
28 SUBJECTED TO A POOR DIET?

1 A. I'M NOT SURE IF I REMEMBER MY REMARKS CORRECTLY
2 THIS MORNING. I SAID THAT FREQUENTLY IN CULT SITUATIONS THAT
3 THERE WERE POOR DIETS. MR. MULL DID RESPOND TO ME HE FELT HE
4 WAS NOT FED WELL AND THAT HE DIDN'T HAVE ALL THE FOOD THAT HE
5 WANTED OR NEEDED.

6 Q. AND WOULD I BE CORRECT IN ASSUMING THAT YOU SIMPLY
7 ACCEPTED HIS STATEMENT AS TO THAT?

8 A. CORRECT.

9 Q. NOW, WHEN YOU SPOKE TO MR. MULL A MONTH AGO, THAT
10 WAS THE THREE HOUR SESSION, IS THAT WHEN YOU DISCUSSED THE DIET
11 AND THE WORK AND THINGS LIKE THAT?

12 A. CORRECT.

13 Q. AT THAT TIME WAS IT KNOWN TO YOU THAT YOU WERE
14 GOING TO BE AN EXPERT WITNESS IN THIS TRIAL?

15 A. IT WAS INTIMATED. I DON'T THINK IT WAS FINALIZED.
16 BUT I THINK BY THE END OF THE INTERVIEW WE HAD DECIDED THAT I
17 WOULD BE.

18 Q. DID IT OCCUR TO YOU DURING THAT INTERVIEW THAT
19 MR. MULL MIGHT HAVE A REASON TO EXAGGERATE SOME OF THESE HOURS
20 AS FAR AS SLEEP, AS FAR AS DECREERING, AS FAR AS WORK IN ORDER
21 TO INDUCE YOU TO TESTIFY ON HIS BEHALF IN THIS CASE?

22 A. IT ALWAYS OCCURS TO ME THAT ANYBODY WHO HAS A
23 VESTED INTEREST MAY WANT TO MANIPULATE THE FACTS FOR THEIR
24 WELL-BEING. IN THIS CASE MY EXPERIENCE OF GREGORY MULL AND
25 PERSONALLY AS WELL AS REPORTS FROM OTHERS, I WOULD NOT BELIEVE
26 THAT OF HIM.

27 Q. YOU ALSO MENTIONED IN TALKING ABOUT THE FACTORS
28 AND I BELIEVE YOU TALKED ABOUT THEM IN TERMS OF GREGORY MULL

1 THAT THE SENSE OF CONFINEMENT, INABILITY TO SEE THE WORLD, DO
2 YOU REMEMBER THAT?

3 A. I'M NOT SURE I DISCUSSED THAT IN TERMS OF GREGORY,
4 BUT I REMEMBER DISCUSSING THAT IN TERMS OF THE GENERAL NATURE
5 OF CULTS. BUT I WOULD SAY THAT GREGORY DID FEEL CONFINED.

6 Q. AND -- NOW, WHEN YOU INTERVIEWED HIM, WAS IT
7 DISCUSSED THAT WHILE HE WAS LIVING AT CAMELOT ON NUMEROUS
8 OCCASIONS HE WENT BACK FOR THE WEEKEND TO SAN FRANCISCO?

9 A. SOMETIMES. I KNEW THAT.

10 Q. AND DID THAT HAVE ANY AFFECT AT ALL ON YOUR
11 CONCLUSION THAT GREGORY WAS CONFINED IN SOMEWAY OR HAD A SENSE
12 OF CONFINEMENT?

13 A. NO.

14 A. CONFINEMENT CAN BE DEFINED IN A WHOLE NUMBER OF
15 WAYS. MY SENSE OF GREGORY IS WHEN HE WENT BACK TO SAN
16 FRANCISCO HE WAS CONFINED BECAUSE REGARDLESS OF THE PHYSICAL
17 LIMITS THAT WERE SET ON HIM AT CAMELOT THERE WAS THE WHOLE
18 DEPENDENCY THROUGH THE INDOCTRINATION PROCESS HE WENT THROUGH
19 IN WHICH HE TOOK ALL OF THOSE LIMITS AND BARRIERS WITH HIM AND
20 FOUND HIMSELF CONSTRAINED AND CONFINED WHEREVER HE WENT. IF I
21 REMEMBER THE QUOTE CORRECTLY PRISON WALLS -- IRON BARS DO NOT A
22 PRISON MAKE, IF I'M RIGHT.

23 Q. IN YOUR STUDIES OF CULTS AND IN YOUR CONSULTATIONS
24 IS IT NORMAL TO FIND THE SITUATION WHERE THE PERSON YOU'RE
25 COUNSELING HAS FREQUENT TRIPS SUCH AS GREGORY'S TRIPS TO SAN
26 FRANCISCO?

27 A. SURE. I HAVE DEALT WITH A NUMBER OF CASES IN A
28 NUMBER OF DIFFERENT CULTS IN WHICH PEOPLE WERE IN EITHER

1 TRUSTED OR RESPECTED POSITIONS WERE ASKED TO TRAVEL TO DO
2 CERTAIN THINGS OR GIVEN THE FREEDOM TO DO SO. IN THE CASE OF A
3 NUMBER OF THEM IT WAS BECAUSE THEY NEEDED TO BE PROVEN THAT --
4 IT NEEDED TO BE PROVEN TO THEM THAT THEY WERE TRUSTED AND THAT
5 THERE WAS UNQUALIFIED FAITH AND CONFIDENCE IN THEM. BY
6 RELEASING THEM OUT OF AN ENVIRONMENT IN WHICH OTHER PEOPLE WERE
7 USUALLY CONFINED WHAT BETTER WAY OF SAYING LOOK YOU'RE TRUSTED
8 AND BELOVED IN THE INNER CIRCLE, SO THAT'S NOT UNUSUAL.

9 Q. WHEN YOU SAY RELEASING THEM OUT OF AN ENVIRONMENT
10 IN WHICH OTHER PEOPLE WERE CONFINED, DO YOU HAVE ANY FACTS THAT
11 LED YOU TO CONCLUDE THAT PEOPLE WERE CONFINED TO CAMELOT?

12 A. IN WHAT SENSE DO YOU MEAN CONFINED. I DON'T
13 UNDERSTAND.

14 Q. WELL, LET'S GO BACK TO WHAT YOU SAID. I TOOK IT
15 FROM YOUR STATEMENT. YOU SAID RELEASING THEM FROM AN
16 ENVIRONMENT WHERE OTHER PEOPLE ARE CONFINED?

17 A. CORRECT.

18 Q. WHAT I'M ASKING: AS YOU USED IT IN THAT
19 STATEMENT, DO YOU HAVE ANY FACTS TO CONCLUDE THAT PEOPLE WERE
20 CONFINED AT CAMELOT.

21 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR. I THINK
22 THAT'S A MISCHARACTERIZATION OF THE WITNESS' TESTIMONY. HE DID
23 NOT TESTIFY THAT PEOPLE WERE CONFINED PHYSICALLY AT CAMELOT.
24 HE TESTIFIED --

25 THE COURT: SUSTAINED.

26 MR. LEVY: HE TESTIFIED ABOUT PSYCHOLOGICAL --

27 MR. KLEIN: I DIDN'T --

28 THE COURT: JUST STATE THE GROUNDS, PLEASE.

1 Q. BY MR. KLEIN: YOU JUST USED THE WORD "CONFINED."
2 I'M NOT INTENDING TO PUT ANY MEANING ON IT. AS YOU USED THE
3 WORD, DO YOU HAVE ANY BASIS TO BELIEVE THAT PEOPLE WERE
4 CONFINED AT CAMELOT?

5 A. ON THE BASIS OF THE INFORMATION AND RESEARCH THAT
6 HAD COME TO ME OVER THE YEARS THAT WE DISCUSSED BEFORE, I WOULD
7 MAKE THAT ASSESSMENT WHEN I SAID CONFINEMENT CAN TAKE PLACE IN
8 A WHOLE NUMBER OF DIFFERENT WAYS AND MY BELIEF IS YES.

9 Q. WHEN YOU USED THE WORD "CONFINED," HOW DO YOU USE
10 IT? WHAT'S YOUR DEFINITION AS YOU HAVE BEEN SPEAKING ABOUT
11 THESE LAST FEW MINUTES?

12 A. THAT THE INDIVIDUAL SPIRITUALLY, PSYCHICALLY,
13 EMOTIONALLY IS SO DEPENDENT ON THE NATURE OF THE ENVIRONMENT IN
14 WHICH THEY LIVE, THE SYSTEM OF ROUTINE AND BEHAVIOR IN WHICH
15 THEY ARE TRAINED, THE ROLE OF AUTHORITY THAT THE ORGANIZATION
16 PLACE IN THEIR LIFE THAT SIMPLY LEAVING THE ENVIRONMENT THOUGH
17 THEY MAY HAVE THE PHYSICAL FREEDOM TO DO SO IS AN ANXIETY
18 PRODUCING AND TERRIFYING EXPERIENCE. IN REPORTS WE HAVE HAD IN
19 A VARIETY OF CULTIC STYLE SITUATIONS INDIVIDUALS WOULD WALK TO
20 THE GATE AND SAY I'M GOING TO LEAVE AND IN THE PROCESS OF
21 SIMPLY WALKING OUT THE GATE WAS TRAUMATIC, ANXIETY PRODUCING,
22 ALMOST LIKE COMMITTING SUICIDE AND PEOPLE WOULD NOT GO.

23 I THINK THAT THE KIND OF DEPENDENCY CREATED WITHIN
24 THE CONTEXT OF THIS HIGHLY PRESSURED, HIGHLY STRUCTURED
25 ORGANIZATION WHICH DENUDES AND STRIPS AWAY PERSONALITY AND
26 AUTONOMY COULD CREATE A CONFINEMENT IN WHICH THE INDIVIDUAL IS
27 NOT ONLY CONFINED WITHIN THE ORGANIZATION BUT CONFINED WITHIN
28 HIMSELF AND THE CAPACITY TO CREATE BROADER STYLES OF BOUNDARIES

1 WHICH MOST OF US HAVE AT NORMAL STAGES OF GROWTH CEASE TO
2 EXIST. SO THAT AN INDIVIDUAL CAN -- GOING THROUGH THIS
3 SITUATION CAN BE IN CONFINEMENT IN A SENSE FOR THE REST OF
4 THEIR LIVES.

5 Q. ARE YOU AWARE OF THE VAST MAJORITY OF CHURCH
6 MEMBERS DO NOT LIVE AT CAMELOT?

7 A. YES. AS I SAID, THERE ARE MANY DIFFERENT KINDS OF
8 CONFINEMENT.

9 Q. WHEN IN YOUR OPINION DID GREGORY MULL FALL UNDER
10 THE CONTROL OF THIS CHURCH? IS THERE A PARTICULAR YEAR?

11 A. I WOULD SAY WHEN HE BEGAN THE PROCESS OF INTENSE
12 DECREEING, HAD MOVED TO CAMELOT OR HAD BEEN VISITING
13 PERIODICALLY. MY SENSE IS THAT THE -- PROBABLY THE TIME THAT
14 WAS THE KEY TRANSITION IN HIS IDENTITY HAS TO DO WITH THE
15 SERMON I TAKE INVOLVES THE CONFESSION LETTER AND CEREMONY A
16 THAT I BELIEVE IS CALLED EXORCISM.

17 Q. NOW, IF I TOLD YOU THAT THE CONFESSION LETTER WAS
18 WRITTEN SOMETIME BETWEEN JANUARY AND MARCH OF 1975, WHEN WOULD
19 YOU TELL ME THAT HE FELL UNDER THE CONTROL OF THIS CHURCH?

20 A. I WOULD SAY IT WAS PROBABLY SOMETIME WITHIN THAT
21 SAME PERIOD, WHETHER HE WAS LIVING THERE OR NOT. IF THE
22 EXORCISM ACCOMPANIED THAT CONFESSION LETTER -- IF MY
23 UNDERSTANDING IS CORRECT IT USUALLY DOES -- THEN THAT WOULD
24 PROBABLY BE ONE OF THE MOST FUNDAMENTAL EXPERIENCES WHICH
25 CREATED THAT TRANSITION.

26 LET ME -- IF I CAN EXPAND ON THAT. THERE IS A
27 MOMENT FOR EACH PERSON THAT I HAVE DEALT WITH OVER THE YEARS
28 THAT HAVE BEEN INVOLVED IN VERY COERCIVE, MANIPULATIVE

1 RELIGIOUS EXPERIENCES, ORGANIZATIONS IN WHICH THERE IS A
2 PRIMARY MOMENT OF TRANSITION. ONE OF THE THINGS I HAVE TRIED
3 TO DO FOR PEOPLE WHO HAVE COME TO ME FOR COUNSELING IS TO GO
4 BACK TO THAT PRIMARY MOMENT AT WHICH — AS I MENTIONED
5 BEFORE — THERE IS AN EXPRESSION OF THIS SPIRITUALITY, A
6 YEARNING AND A HOPING SOMETIMES IN A CONFESSIONAL AND THEN A
7 RESPONSE FROM THE ORGANIZATION WHICH I BELIEVE TAKES CONTROL OR
8 ATTEMPTS TO AUTHENTICATE IT AND I THINK THAT THAT WOULD BE THE
9 TIME THAT GREGORY WAS TAKEN. FROM MY DISCUSSIONS WITH HIM, I
10 THINK THAT THAT CONFESSIONAL LETTER WAS VERY IMPORTANT IN THAT
11 PROCESS.

12 Q. WHAT IF I TOLD YOU THAT A NUMBER OF MONTHS AFTER
13 HE WROTE THE CONFESSIONAL LETTER HE WROTE A LETTER TO ELIZABETH
14 CLARE PROPHET TELLING HER HE WAS WITHDRAWING FROM THE
15 ORGANIZATION WOULD THAT — FIRST OF ALL WERE YOU AWARE OF THAT?

16 A. HE HAD TOLD ME HE HAD HAD DOUBTS PERIODS OF TIME.
17 THAT WOULD NOT SURPRISE ME. THERE IS A CONSTANT GIVE AND TAKE
18 AND PULL IN THIS PROCESS AND EVEN THOUGH THERE IS A CLEAR
19 MOMENT WHEN SOMEONE GETS HOOKED THERE IS IN THE NATURAL NATURE
20 OF ONE'S PERSONALITY A CAPACITY TO DOUBT. PART OF WHAT
21 SUSTAINS MEMBERSHIP IS NOT ONLY THE UNWILLINGNESS OF PEOPLE TO
22 ACCEPT THEIR DOUBTING BUT ALSO THE INCREDIBLE CHARISMATIC
23 PRESENCE OF THE LEADER THAT CONSISTENTLY PUSHES AT ONE'S
24 PERSONAL DOUBT AND SAYS THAT THEY'RE NOT ACCURATE. SO THAT MY
25 EXPERIENCE WITH PEOPLE WHO HAD BEEN IN ORGANIZATIONS LIKE THIS
26 IS THAT THEY PERIODICALLY DOUBT. IN FACT — AND SOME OF THEM
27 WILL ACT ON IT. IN THIS CASE GREGORY DID BUT HE CERTAINLY
28 DIDN'T FOLLOW THROUGH ON IT.

1 Q. AND WERE YOU AWARE THAT AFTER GREGORY MULL
2 CONCLUDED THAT THREE MONTH PERIOD, THEY CALL THAT SUMMIT
3 UNIVERSITY, MARCH OF 1975, FROM 1975 UNTIL 1979 WITH AN
4 EXCEPTION OF ANOTHER THREE MONTH PERIOD WERE YOU AWARE THAT HE
5 LIVED BASICALLY IN HIS HOME IN SAN FRANCISCO?

6 A. UH-HUH.

7 Q. AND DOES THE FACT THAT FROM '75 TO '79 THAT HE
8 LIVED AT HOME IN SAN FRANCISCO, ATE HIS MEALS IN HIS OWN HOUSE,
9 WENT TO SLEEP WHEN HE WANTED TO GO TO SLEEP, DOES THAT IN ANY
10 WAY AFFECT YOUR CONCLUSIONS THAT WAS UNDER THEIR CONTROL AND
11 MANIPULATION FOR THOSE YEARS?

12 A. NO. BECAUSE AGAIN, AS I SAID, MY EXPERIENCE WITH
13 THIS KIND OF MANIPULATION IS THAT YOU DON'T ALWAYS HAVE TO BE
14 IN THE CENTER OF IT FOR IT TO CONTINUE. BUT DURING THOSE
15 PERIOD OF YEARS THAT GREGORY WAS LIVING IN SAN FRANCISCO HE WAS
16 STILL PARTICIPATING IN SERVICES, HE WAS DOING THE DECREERING, HE
17 WAS DOING THE STUDYING, SO THERE WAS A WHOLE SUPPORTIVE
18 ENVIRONMENT AROUND HIM TO SUSTAIN WHAT THE CHURCH HAD DONE. IF
19 MY UNDERSTANDING IS CORRECT, HIS MOVEMENT TO CAMELOT IN A SENSE
20 WAS A PROMOTION, IT WAS A STEP UP. THERE WAS ALL THOSE YEARS
21 OF PREPARATION FOR THAT GREAT MOMENT.

22 Q. DID YOU TALK TO MR. MULL ABOUT WHAT HE WAS
23 EXPECTING FROM THIS CHURCH?

24 A. YES.

25 Q. DO YOU THINK THAT MR. MULL MIGHT HAVE BEEN
26 EXPECTING TOO MUCH FROM THIS CHURCH, MORE FROM THIS CHURCH THAN
27 THIS CHURCH OR ANY OTHER CHURCH COULD GIVE HIM, IS THAT A FAIR
28 STATEMENT?

1 A. I DON'T THINK SO. I THINK THAT WHAT HAD HAPPENED
2 FOR GREGORY WAS THAT HIS SPIRITUAL SEARCH HE BELIEVED HAD
3 FINALLY COME TO A CONCRETE SOURCE. HE BELIEVED VERY STRONGLY
4 IN ELIZABETH CLARE PROPHET'S ROLE. HE BELIEVED THAT THERE WAS
5 TANGIBLE EVIDENCE FROM HER OF GOD'S ACCEPTANCE AND LOVE OF HIM.
6 HE BELIEVED IN HER MASTERY OF REALITY AND TRUTH. FOR HIM HE
7 WAS -- HIS EXPECTATIONS HAD BEEN FAR EXCEEDED EVEN AT THE
8 BEGINNING OF THE PROCESS BECAUSE HE WAS WILLING TO HAVE
9 SOMETHING CONCRETE.

10 AND AT THE BEGINNING, AS HE EXPRESSED TO ME, HE
11 FELT LOVED, HE FELT IMPORTANT, SO HE HAD TANGIBLE PROOF THAT
12 HIS EXPECTATIONS HAD BEEN MET. I THINK THAT WHAT WENT ON OVER
13 THE YEARS IS THAT ALL GREGORY MULL WANTED TO DO WAS SIMPLY
14 SERVE THE ONE WHO LOVED HIM. THE REALITY CAME MUCH LATER WHEN
15 BECAUSE OF HIS OWN INDIVIDUALITY THE LOVE WAS WITHDRAWN.

16 I THINK THAT HIS EXPECTATIONS WERE PROBABLY VERY
17 CHILDLIKE ON THE BASIS OF WHAT I DISCUSSED WITH HIM AND AS LONG
18 AS HE HAD -- AS LONG AS HE COULD HAVE BEEN LOVED I THINK HE
19 WOULD HAVE BEEN DOCILE, HAPPY, AND PASSIVE. WHAT FINALLY LEAD
20 HIM TO THE BEGINNING OF DOUBTS LATER ON IN THE LATE 70'S WAS AN
21 INCOHERENCE BETWEEN THE WORDS OF THE MASTER AND HER BEHAVIOR
22 AND AS THAT BECAME MORE INCOHERENT HE BEGAN TO HAVE DOUBTS
23 AGAIN.

24 Q. WHAT OTHER PEOPLE -- WHAT OTHER INDIVIDUALS DID
25 YOU SPEAK TO -- I DON'T WANT TO YOU REVEAL -- I AM NOT TALKING
26 ABOUT THE OTHER COUNSELING PEOPLE. BUT DID YOU SPEAK TO ANY
27 OTHER INDIVIDUALS IN ORDER TO GET FACTS ABOUT MR. MULL AND
28 ABOUT THIS CASE AS TO WHAT HAPPENED?

1 A. I SPOKE TO COUNSELORS AND OTHER PEOPLE WHO HAD
2 SPOKEN TO HIM. BUT BY IN LARGE THE BULK OF MY OPINION RESTED
3 WITH MY TIME WITH GREGORY MULL HIMSELF.

4 Q. YOUR THREE HOURS A MONTH AGO AND YOUR ONE HOUR A
5 COUPLE YEARS AGO?

6 A. CORRECT.

7 Q DO YOU HAVE ANY NOTES OF THOSE SESSIONS?

8 A. NO, I DON'T NEED NOTES.

9 Q. YOU REMEMBER WHAT YOU TALKED TO HIM ABOUT WHEN YOU
10 HAD THAT MEETING TWO YEARS AGO? I'M NOT ASKING WHAT IT WAS.
11 I'M ASKING YOU IF YOU REMEMBER IT?

12 A. I REMEMBER IT IN GOOD SUBSTANCE. MAY I EXPLAIN
13 THAT?

14 Q. SURE.

15 A. I'M DYSLEXIC; THAT'S A LEARNING DISABILITY WHICH
16 MAKE IT DIFFICULT TO BOTH READ AND WRITE. I USED TO BE
17 CONSIDERED MENTALLY RETARDED AS CHILD. BUT I HAVE A VERY
18 STRONG MEMORY FOR CERTAIN KINDS OF EXPERIENCE AND THAT'S HOW I
19 FUNCTION.

20 Q. WOULDN'T IT BE POSSIBLE — LET ME JUST WITHDRAW
21 THAT. WOULD YOU AGREE THAT IN INTERVIEWING SOMEBODY LIKE
22 GREGORY MULL WHEN YOU'RE GOING TO COME IN HERE AND TESTIFY
23 ABOUT THE FACTS AND APPLY IT TO YOUR THEORIES THAT IT WOULD BE
24 PREFERABLE TO HAVE SOME KIND OF NOTES SO THAT YOU COULD KNOW
25 WHAT HE TOLD YOU A COUPLE OF YEARS AGO AND COMPARE IT TO WHAT
26 HE TOLD YOU A MONTH AGO AND COMPARE IT TO WHAT HE TESTIFIED TO
27 IN THIS TRIAL, WOULD THAT BE PREFERABLE?

28 A. IF I WAS CAPABLE OF DOING THAT OR IF I FELT IT WAS

1 NECESSARY I WOULD. THE INITIAL CONVERSATION I HAD WITH GREGORY
2 SOME SEVERAL YEARS AGO HAD NOTHING TO DO WITH ANYTHING IN
3 SPECIFIC AS A TRIAL. THE MATERIAL THAT I GLEANED FROM GREGORY
4 IN THE INTERVIEW I KNEW HAD SPECIFIC PURPOSE AND SO I FILED IT
5 AWAY IN MY MEMORY AND MY AWARENESS IN VERY DIFFERENT KINDS OF
6 WAYS. THE MATERIAL THAT I READ AND THAT I HAVE STUDIED WHICH
7 WAS PROVIDED TO ME WAS IN COHERENCE WITH WHAT WE HAD DISCUSSED
8 SO I FELT REASSURED.

9 Q. I TAKE IT THERE WOULD BE NOTHING PREVENTING YOU
10 FROM RIGHT AFTER SPEAKING TO GREGORY MULL OR ANYBODY ELSE IN A
11 COUNSELING SESSION TO TAKE A DICTAPHONE AND DICTATE NOTES OF
12 WHAT WAS JUST SAID? THERE IS NO REASON YOU COULDN'T DO THAT?

13 A. I COULD HAVE. BECAUSE OF A PRIEST PENITENCE
14 RELATIONSHIP AND MY CONCERN WITH ULTIMATE CONFIDENTIALITY I
15 WOULD NEVER DO THAT UNLESS THERE WAS SOMETHING I FELT I
16 ACTUALLY HAD TO KEEP THEN I WOULD TAKE A TAPE WITH ME AND
17 DESTROY IT LATER AFTER I RELISTENED, WHICH SOMETIMES I WILL DO.

18 Q. WHEN YOU SPOKE TO GREGORY MULL A MONTH AGO THAT
19 WASN'T A PRIEST PENITENCE CONVERSATION, WAS IT?

20 A. I CONSIDERED IT SO.

21 Q. DIDN'T YOU JUST TESTIFY ALL MORNING ABOUT WHAT HE
22 TOLD YOU?

23 A. HE GAVE ME THE PERMISSION TO TALK ABOUT IT.

24 Q. YOU KNEW WHEN YOU SPOKE TO HIM IT WASN'T GOING TO
25 BE A PRIEST PENITENCE SITUATION THAT WOULD BE CONFIDENTIAL;
26 ISN'T THAT RIGHT?

27 A. I GUESS YOU COULD ASSUME THAT. I STILL DID NOT
28 FEEL THE NEED EITHER TO TAPE RECORD IT OR MAKE COMPREHENSIVE

1 NOTES ABOUT IT.

2 Q. BUT BY NOT DOING SO THERE IS NO WAY FOR US TO LOOK
3 AT THOSE NOTES AND SEE IF WHAT HE SAID IN THOSE NOTES IS
4 INCONSISTENT WITH WHAT HE SAID IN THIS TRIAL; IS THAT RIGHT?

5 A. SINCE I DON'T HAVE THEM, NO IT WOULD NOT BE
6 POSSIBLE.

7 Q. YOU TALKED ABOUT THE DAMAGE DONE TO GREGORY MULL.
8 NOW, IN ORDER TO ASSESS THE DAMAGE DONE TO GREGORY MULL, WOULD
9 I BE CORRECT THAT YOU WOULD HAVE TO HAVE SOMETHING TO COMPARE
10 THE GREGORY MULL THAT YOU SAW ONE MONTH AGO WITH THE GREGORY
11 MULL THAT EXISTED IN, SAY, 1973 OR SOMETIME BEFORE HE JOINED
12 THE CHURCH, IS THAT FAIR?

13 A. IT WOULD BE PREFERABLE TO HAVE KNOWN GREGORY 20
14 YEARS AGO AND THEN 15 YEARS AGO AND TEN YEARS AGO TO COMPARE
15 THE TRANSITION. THAT'S NOT REALISTIC CERTAINLY.

16 Q. I UNDERSTAND THAT'S NOT REALISTIC. MY QUESTION
17 IS, DID YOU PERFORM ANY KIND OF INVESTIGATION OTHER THAN
18 SPEAKING TO GREGORY MULL AND MR. LEVY TO DETERMINE WHAT GREGORY
19 MULL WAS LIKE PRIOR TO WHEN HE BECAME A CHURCH MEMBER?

20 A. NO.

21 Q. FOR EXAMPLE, YOU TALKED ABOUT HIM TONGUE THRUSTING
22 AND CONFUSION AND THINGS LIKE THAT. WOULD I BE CORRECT IN A
23 ASSUMING THAT YOU HAVE NO WAY OF KNOWING WHETHER HE WAS DOING
24 THE EXACT SAME THINGS IN 1972 BEFORE HE EVER HEARD OF THIS
25 CHURCH?

26 A. HE TOLD ME HE WAS WASN'T AND I BELIEVED HIM ON THE
27 BASIS, I WOULD HAVE TO SAY, OF HIS PROFESSIONAL CAREER, WHAT
28 APPEARS TO BE GREAT COMPETENCE AT LIVING, CREATING A

1 REPUTATION, ET CETERA, AND A COMPETENT INCOME, HAVING FRIENDS,
2 ET CETERA, AND THAT HE WAS EVEN TEACHING HIS OWN SPIRITUALITY
3 GROUP PRIOR THAT HE MUST HAVE BEEN IN PRETTY DECENT CONTROL OF
4 HIS LIFE.

5 Q. BASICALLY, SINCE HE WAS RUNNING A SUCCESSFUL
6 BUSINESS, DESIGN BUSINESS BEFORE HE JOINED THE CHURCH?

7 A. THAT -- A FAMILY, A DAUGHTER, FRIENDS, ET CETERA,
8 THAT HIS LIFE HAD ALL OF THE NORMAL OUTLINES THAT I WOULD
9 EXPECT TO SEE IN A NORMALLY NEUROTIC, FUNCTIONING HUMAN BEING.

10 Q. YOU KNOW HE WAS RUNNING A SUCCESSFUL BUSINESS,
11 DESIGNER BUSINESS BEFORE HE JOINED THE CHURCH BECAUSE HE TOLD
12 YOU THAT?

13 A. THAT'S THE INFORMATION I WAS GIVEN.

14 Q. YOU ASSUMED IT WAS CORRECT SINCE THAT'S WHAT HE
15 TOLD YOU?

16 A. HE FELT IT WHAT SUCCESSFUL. IT MET HIS NEEDS.
17 I'M WILLING TO ACCEPT THAT DEFINITION.

18 Q. YOU DIDN'T DO ANYTHING LIKE SAY LET ME LOOK AT
19 YOUR TAX RETURN TO DETERMINE IF THIS DESIGN BUSINESS WAS REALLY
20 SUCCESSFUL, DID YOU?

21 A. NO, I WOULD NOT CONSIDER THAT TO BE WITHIN MY
22 PURVIEW. I'M MORE CONCERNED WITH HIS EMOTIONAL JUDGMENT ABOUT
23 THE NATURE OF HIS LIFE RATHER THAN THE IRS'S JUDGMENT OF HIM.

24 Q. ARE YOU AWARE THAT ABOUT JANUARY OF 1979 MR. MULL
25 MOVED TO CAMELOT?

26 A. THAT'S WHAT I WAS TOLD.

27 Q. AND YOU KNOW WHEN HE LEFT?

28 A. EARLY -- ABOUT 19 -- IF I'M -- I'M TRYING TO

1 REMEMBER CORRECTLY. IT WAS ABOUT A YEAR AND A HALF TO TWO
2 YEARS LATER.

3 Q. LET'S SAY MID 1980?

4 A. ABOUT.

5 Q. DO YOU KNOW WHETHER HIS WORK STATUS AT CAMELOT AS
6 FAR AS THE AMOUNT OF HOURS HE WORKED, AS FAR AS WHETHER HE WAS
7 WORKING JUST FOR THE CHURCH OR DOING OUTSIDE ARCHITECTURAL WORK
8 ON HIS OWN DO YOU KNOW IF THAT STATUS CHANGED AT ANY TIME
9 DURING THE YEAR AND A HALF HE WAS AT CAMELOT?

10 A. I DON'T UNDERSTAND. IT'S UNCLEAR. PLEASE.

11 Q. WHEN HE FIRST CAME TO CAMELOT HE WAS WORKING
12 TOTALLY ON CHURCH ARCHITECTURAL WORK, DOING DESIGN WORK TOTALLY
13 FOR THE CHURCH, HE WAS WORKING A CERTAIN AMOUNT OF HOURS A DAY,
14 YOU DESCRIBED IT WAS LONG HOURS. MY QUESTION TO YOU IS, DO YOU
15 KNOW WHETHER BY MAY OF 1980, WHICH IS ABOUT WHEN HE LEFT,
16 WHETHER HE WAS STILL WORKING A HUNDRED PERCENT ON CHURCH
17 ARCHITECTURAL PROJECTS AND WHETHER HE WAS WORKING A SIMILAR
18 NUMBER OF HOURS A DAY FOR THE CHURCH AS HE HAD BEEN WHEN HE
19 FIRST CAME?

20 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR. THE
21 QUESTION IS COMPOUND.

22 THE COURT: SUSTAINED.

23 MR. KLEIN: I WILL BREAK IT UP.

24 Q. DO YOU -- LET'S JUST TAKE THE ISSUE OF THE KIND OF
25 WORK HE WAS DOING. WHEN HE FIRST CAME TO CAMELOT, HE WAS
26 WORKING A HUNDRED PERCENT FULL TIME DOING CHURCH ARCHITECTURAL
27 WORK THEY GAVE HIM TO DO. DO YOU KNOW IF WHEN HE LEFT IN MAY
28 OF 1980 AT THAT TIME HE WAS STILL PUTTING ALL HIS TIME INTO

1 CHURCH WORK, CHURCH ARCHITECTURAL WORK AS OPPOSED TO DOING
2 OUTSIDE WORK FOR HIS OWN CLIENTS?

3 A. NO, I DON'T KNOW THAT. I KNOW THAT SOMEWHERE IN
4 THAT PROCESS, ESPECIALLY NEAR THE END OF HIS STAY AT CAMELOT,
5 THAT HE BEGAN TO BE CONCERNED ABOUT SOME OTHER LIFE FOR
6 HIMSELF. BUT AT WHAT POINT HE MAY HAVE MADE TRANSITION, I
7 DON'T KNOW.

8 Q. YOU SAID HE WAS UNDER THE CONTROL AND MANIPULATED
9 BY THE CHURCH AND WE ESTABLISHED THAT HE STARTED SOMETIME
10 AROUND MARCH OF 1975. WHEN DID IT END?

11 A I'M NOT SURE IT'S OVER.

12 Q. IT STILL MAY BE ONGOING?

13 A. MY EXPERIENCE WITH GREGORY AT THIS POINT IS THAT I
14 DON'T THINK HE'S TOTALLY FREE OF THE SITUATION. IF YOU WANTED
15 TO CREATE A POINT AT WHICH THERE MAY HAVE BEEN A SIGNIFICANT
16 RUPTURE —

17 Q. YES THAT'S WHAT I WANT.

18 A. — I WOULD SAY THE FINAL INTERVIEW IN WHICH HE WAS
19 WITH ELIZABETH CLARE PROPHET, EDWARD FRANCIS, AND MONROE
20 SHEARER. I WOULD SAY THAT WOULD PROBABLY BE THE COUP DE GRACE.

21 Q. WERE YOU AWARE THAT IN APRIL OF 1980 HE WROTE A
22 LETTER TO THE CHURCH WHERE HE TOLD THEM HE WOULD PAY THEM
23 \$10,000.00 IF THEY WAIVED THEIR RIGHT TO ANY OTHER CLAIMS AND
24 THEIR CLAIM AT THAT TIME WAS THAT HE OWED THEM 37,000. WITHOUT
25 RESPECT TO WHO'S RIGHT OR WHO'S WRONG, WERE YOU AWARE THAT HAD
26 HAPPENED?

27 A. I'M AWARE THERE WAS COMMUNICATION OF THAT SORT. I
28 DON'T REMEMBER THE EXACT NUMBERS RIGHT NOW.

1 Q. DO YOU THINK IN APRIL OF 1980 BASED ON WHAT I HAVE
 2 JUST TOLD YOU THAT GREGORY WAS STILL UNDER THE CONTROL, THE
 3 SIGNIFICANT CONTROL OF THE CHURCH?

4 A. I THINK HE WAS TRYING TO BREAK IT. I THINK THAT'S
 5 PART OF WHAT THAT KIND OF COMMUNICATION IS ABOUT. IF HE WAS
 6 OUT OF CONTROL -- IF HE WAS NOT UNDER CONTROL OF THE CHURCH, HE
 7 WOULD NOT HAVE TO HAVE THAT KIND OF COMMUNICATION IN ORDER TO
 8 TRY TO FIND A DEAL TO GET HIMSELF OUT AND TO GET THEM FROM
 9 PRESSURING HIM -- HE WOULD HAVE SIMPLY SAID NO AND LET IT GO AT
 10 THAT.

11 Q. HE SIGNED A PROMISSORY NOTE FOR THE CHURCH IN
 12 ABOUT OCTOBER OF 1979; WERE YOU AWARE THAT WHEN HE SIGNED THAT
 13 NOTE HE SAID WHEN HE SIGNED IT HE HAD NO INTENTION OF PAYING
 14 IT?

15 MR. LEVY: I'M GOING TO OBJECT TO THAT, YOUR HONOR.
 16 THAT'S MISCHARACTERIZATION OF THE TESTIMONY OF MR. MULL --
 17 THE COURT: SUSTAINED.

18 Q. BY MR. KLEIN: ONE OF THE THINGS YOU TESTIFIED
 19 THIS MORNING WAS THAT IT'S SO DIFFICULT TO LEAVE THE CULTS AND
 20 GO BACK TO REAL LIFE AND ONE OF THE THINGS YOU SAID WAS THAT
 21 MR. MULL HAD NOT BEEN TAKING CARE OF HIS OWN NEEDS FOR A NUMBER
 22 OF YEARS; IS THAT CORRECT?

23 A. I BELIEVE I SAID SOMETHING LIKE THAT.

24 Q. IS THAT YOUR UNDERSTANDING OF THE FACTS IN THIS
 25 CASE?

26 A. SEEMS TO BE MY ASSESSMENT.

27 Q. WERE YOU AWARE THAT AT THE TIME MR. MULL LEFT
 CHURCH THAT HE OWNED A CONDOMINIUM IN WESTLAKE?

1 MR. LEVY: I'M GOING TO OBJECT TO THAT, YOUR HONOR. NOT
2 ONLY IS IT IRRELEVANT BUT IT'S ALSO A MISSTATEMENT OF THE FACTS
3 AS MR. MULL TESTIFIED.

4 THE COURT: THEIR WAS SOME EVIDENCE THOUGH, ISN'T THERE,
5 TO SUPPORT THE QUESTION?

6 MR. LEVY: IF I MAY CLARIFY, YOUR HONOR. MR. MULL
7 TESTIFIED IN THIS COURT THAT HE BORROWED FUNDS TO PUT A DOWN
8 PAYMENT ON IT; HE ALSO TESTIFIED THAT THERE WAS A RATHER LARGE
9 MORTGAGE ON IT. HE DID NOT TESTIFY THAT HE OWNED IT OUTRIGHT.

10 MR. KLEIN: I WILL CLARIFY THAT.

11 Q. WERE YOU AWARE THAT HE HAD A CONDO IN WESTLAKE
12 THAT WAS HIS? HE MAY NOT HAVE PAID ALL THE MONEY ON IT, HE PUT
13 A DOWN PAYMENT ON IT, IT WAS HIS CONDO?

14 A. YES.

15 Q. IN VIEW OF THAT --
16 WITHDRAW THAT.

17 WERE YOU AWARE WHEN YOU GAVE YOUR CONCLUSION THIS
18 MORNING THAT BEGINNING IN ABOUT NOVEMBER OF 1979 FROM THAT
19 POINT ON MR. MULL HAD ONLY WORKED TWO HOURS A WEEK ON CHURCH
20 ARCHITECTURAL WORK AND THE REST OF HIS TIME HE HAD SPENT ON HIS
21 OWN OUTSIDE ARCHITECTURAL WORK? WERE YOU AWARE OF THAT?

22 MR. LEVY: AGAIN, YOUR HONOR, I'M GOING TO OBJECT.
23 THERE HAS BEEN NO TESTIMONY THAT MR. MULL HAD OUTSIDE WORK. HE
24 TESTIFIED HE SOUGHT OUTSIDE WORK.

25 THE COURT: SUSTAINED.

26 Q BY MR. KLEIN: WERE YOU AWARE THAT HE HAD WORKED
27 BEGINNING IN NOVEMBER OF '79 20 HOURS A WEEK ON CHURCH
28 ARCHITECTURAL WORK AND THE REST OF THE TIME ANY WORK HE DID

1 WOULD HAVE BEEN IN HIS OWN ARCHITECTURAL WORK?

2 A. HE TOLD ME IN THAT PERIOD OF TIME THAT YOU RESPOND
3 TO THAT HE WAS FEELING MORE AND MORE CONFUSED ABOUT HIS STATUS
4 AT THE CHURCH, THE PRESSURE OVER HIS HOME AND MONEY HAD LED HIM
5 TO BE CONCERNED ABOUT THE FUTURE OF BOTH HIMSELF AND HIS
6 DAUGHTER AND THAT HE FELT THAT HE NEEDED SOME KIND OF FINANCIAL
7 SECURITY SO HE BEGAN TO SEEK OUTSIDE WORK.

8 Q. MY QUESTION IS BASED ON THE FACT THAT HE HAD BEEN
9 SEEKING OUTSIDE WORK SINCE NOVEMBER OF '79. BASED ON THE FACT
10 THAT HE DID HAVE A CONDOMINIUM IN WESTLAKE WHICH HE COULD CALL
11 HOME, DO YOU THINK IT'S CORRECT TO SAY THAT HE HAD BEEN NOT
12 LIVING AND TAKING CARE OF HIS NEEDS FOR A NUMBER OF YEARS?

13 A. I WOULD STILL SAY THAT BECAUSE NEEDS ARE -- AGAIN
14 I WILL GO BACK IN TERMS OF THE REALM THAT I TESTIFY INTO. I'M
15 NOT SIMPLY TALKING ABOUT PHYSICAL NEEDS, I'M TALKING ABOUT
16 SPIRITUAL, PSYCHOLOGICAL NEEDS. MR. MULL'S CAPACITY TO CREATE
17 A TOTAL LIFE IN WHICH HE WAS AUTONOMOUS, IN CHARGE OF HIS OWN
18 LIFE, MAKING HIS OWN DECISIONS AND ATTEMPTING TO BUILD HIS OWN
19 PRIVATE AUTHORITY AND AUTONOMY. HE WAS IN THE PROCESS OF
20 TRYING TO GRAPPLE WITH THE CONFLICT BETWEEN THAT AND THE
21 PRESSURE AND THE POWER OF THE CHURCH. AND I THINK THEN AS OF
22 NOW THAT HIS NEEDS ARE NOT -- WERE NOT MET AND ARE NOT MET NOW
23 AND THAT HE WAS TRYING TO FIND SOME WAY TO BALANCE HIS
24 ENORMOUS SENSE OF RESPONSIBILITY TO THE CHURCH UNIVERSAL &
25 TRIUMPHANT AND YET STRUGGLE WITH WHAT WAS HIS OWN NEED FOR SOME
26 LIFE FOR GREGORY MULL.

27 Q. DO PEOPLE IN OTHER RELIGIONS -- JEWISH, CATHOLIC,
28 PROTESTANT -- SOMETIMES HAVE THAT SAME PROBLEM OF GETTING THEIR

1 SPIRITUAL LIFE BACK TOGETHER AGAIN BECAUSE THEY HAVE DECIDED
2 THAT THEY DON'T WANT TO BE PART OF THAT RELIGION?

3 A. OF COURSE. BUT THEY DON'T GET SUED OR HARASSED OR
4 CONDEMNED FOR DOING SO.

5 Q. NOW, THE HARASSMENT THAT YOU HAVE BEEN MENTIONING
6 I TAKE IT THAT'S BASED ON WHAT MR. MULL HAS TOLD YOU; IS THAT
7 RIGHT?

8 A. YES.

9 Q AND HE TOLD YOU THAT THE CHURCH HAS DONE THINGS TO
10 HIM?

11 A. YES.

12 Q. THEY PUT A BOMB IN HIS CAR?

13 A. THEY REFLECTED THAT IT HAPPENED.

14 Q. DID YOU BELIEVE THAT?

15 A I BELIEVE THAT AN INCIDENT LIKE THAT HAPPENED.

16 Q. DO YOU -- DID YOU BELIEVE THAT -- LET ME WITHDRAW
17 THAT. IN YOUR TALKS WITH MR. MULL, DID YOU EVER COME TO THE
18 CONCLUSION THAT HE IS A BIT PARANOID ABOUT THINGS IN GENERAL
19 AFTER LEAVING THE CHURCH?

20 A. NO QUESTION. I THINK GREGORY IS AFRAID OF JUST
21 ABOUT EVERYTHING AS A RESULT OF LEAVING THE CHURCH. AS I
22 TESTIFIED BEFORE, THAT'S A COMMON REALITY. HE'S FRIGHTENED.
23 HE WAS -- HE FEELS HE WAS THREATENED; I THINK HE WAS. IT'S A
24 COMMON PHENOMENA WITH OTHER PEOPLE COMING OUT OF CULTS. IF HE
25 WASN'T, I WOULD BE SURPRISED.

26 Q. HOW DO YOU KNOW THAT IN 1972 HIS REACTION TO THE
27 WORLD WASN'T THAT SAME KIND OF PARANOID REACTION. DO YOU KNOW
28 THAT OTHER THAN --

1 A. NO. SINCE I DID NOT KNOW GREGORY MULL IN 1972, I
2 COULDN'T SAY THAT.

3 Q. YOU DIDN'T SPEAK TO ANY PEOPLE WHO KNEW HIM IN
4 '72, DID YOU?

5 A. NO. ON THE BASIS OF OUR CONVERSATIONS ABOUT HIS
6 LIFE PRIOR TO THE ENTERING THE CHURCH UNIVERSAL & TRIUMPHANT, I
7 FEEL THAT GREGORY WAS A NEEDY MAN WHO WAS LOOKING FOR THE
8 THINGS TESTIFIED TO BEFORE. THAT DOES NOT MEAN HE WAS
9 PARANOID.

10 Q. NOW, IN VIEW OF THE FACT THOUGH THAT YOU KNOW HE
11 WAS SCARED OF EVERYTHING OTHER --

12 MR. LEVY: I'M GOING TO OBJECT TO THAT. NOT ONLY --
13 EVEN THOUGH THE QUESTION IS NOT FINISHED, THERE HAS BEEN NO
14 EVIDENCE THAT MR. MULL WAS SCARED OF EVERYTHING.

15 THE COURT: SUSTAINED.

16 MR. KLEIN: I WILL WITHDRAW THAT.

17 Q. IN VIEW OF THE FACT THAT YOU KNEW HE DID HAVE
18 FEARS, DO YOU THINK THAT IT WOULD HAVE BEEN APPROPRIATE FOR YOU
19 TO DO SOME INVESTIGATION INTO THE INCIDENTS THAT HE TOLD YOU
20 ABOUT BEFORE REACHING THE CONCLUSION THAT HE WAS IN FACT BEING
21 HARASSED BY THE CHURCH?

22 A. NO. ON THE BASIS OF THE INFORMATION THAT I HAD
23 FROM GREGORY, THE DOCUMENTS WHICH HAD BEEN PROVIDED TO ME,
24 CONVERSATIONS WITH -- THAT I HAD DESCRIBED BEFORE FROM OTHER
25 PEOPLE, I BELIEVE THAT WHAT GREGORY DESCRIBED WAS COHERENT WITH
26 THE POSITION OF WHAT WOULD GO ON WITH SOMEBODY ATTEMPTING TO
27 LEAVE THAT ORGANIZATION, ESPECIALLY SOMEONE WHO HAD BEEN ON THE
28 INSIDE, WHO KNEW MUCH OF FUNCTIONING, HAD SOME SENSE OF THE

1 FINANCIAL REALITIES AND WAS CONSIDERED TO BE AN IMPORTANT
2 PERSON.

3 Q. SO, BASICALLY, WHAT YOU'RE TELLING ME IS BASED ON
4 THAT YOU DIDN'T DO ANYTHING TO INVESTIGATE WHETHER ANY OF THESE
5 INCIDENTS ACTUALLY OCCURRED?

6 A. NO, I DID NOT. BY THE WAY, I DON'T DO THIS
7 PROFESSIONALLY FOR A LIVING. MR. MULL CAME TO ME IN THE
8 CONTEXT OF MY SERVING A 1600 FAMILY CONGREGATION. I DID NOT
9 HAVE MANY HOURS TO PUT INTO DOING THAT SORT OF RESEARCH WHICH I
10 WOULD ASSUME WOULD REQUIRE A PRIVATE DETECTIVE.

11 Q. YOU KNEW YOU WERE GOING TO COME AND TESTIFY IN
12 THIS TRIAL?

13 A ON THE BASIS OF MY EXPERIENCE WITH GREGORY,
14 CORRECT.

15 Q. AND DID YOU THINK THAT YOU SHOULD DO EVERYTHING
16 POSSIBLE IN ORDER TO DETERMINE THE VERACITY OF THE FACTS THAT
17 HE WAS GIVING YOU SO THAT WHEN YOU CAME AND APPLIED THEM TO
18 YOUR THEORIES YOU WOULD BE CERTAIN THAT THE FACTS WERE IN FACT
19 CORRECT?

20 A. I DID EVERYTHING POSSIBLE WITHIN MY POWER TO DO
21 SO.

22 Q. THOSE POWERS WERE QUITE LIMITED?

23 A. IT DEPENDS ON YOUR DEFINITION.

24 THE COURT: WE WILL TAKE OUR AFTERNOON RECESS AT THIS
25 TIME.

26 (RECESS.)

27 THE COURT: PLEASE PROCEED.

28 Q BY MR. KLEIN: WHEN YOU TOLD ME THAT YOU HAD

1 INTERVIEWED SOMETHING LIKE SIX EX-MEMBERS AND THREE MEMBERS OF
2 CHURCH UNIVERSAL DURING THE YEARS YOU HAVE BEEN COUNSELING
3 PEOPLE, WOULD I BE CORRECT IN ASSUMING THAT ALL THREE OF THE
4 MEMBERS WERE PEOPLE WHO HAD SOME DOUBTS ABOUT THE ORGANIZATION
5 AND THAT'S WHY THEY WERE SEEING YOU?

6 A. NO. I SAID THAT THEY HAD EXPERIENCED A LECTURE
7 THAT I HAD GIVEN OR SOME OTHER WAY IN THAT THEY HAD COME UP TO
8 ASK ME QUESTIONS AS A RESULT OF WHAT I HAD SAID, MAYBE TO ARGUE
9 WITH ME OR TO SIMPLY INQUIRE. IT'S BEEN MY EXPERIENCE THAT
10 PEOPLE WILL APPROACH ME NOT BECAUSE THEY HAVE DOUBTS BUT
11 BECAUSE SOMETHING I SAY MAY STRIKE A CORD IN THEM, THEY MAY
12 HAVE DOUBTS AS A RESULT OF WHAT I SAY BUT THEY MAY NOT
13 NECESSARILY HAVE HAD THEM BEFORE.

14 Q. WITH RESPECT TO THOSE THREE MEMBERS, DID YOUR
15 CONVERSATIONS AND INTERVIEWS AND INFORMATION YOU RECEIVED FROM
16 ANY OF THEM MERELY ENTAIL SOME KIND OF A CONVERSATION AFTER A
17 LECTURE?

18 A. NO. THEN I WOULD -- WE TALKED FOR AWHILE AND I
19 WOULD SAY IF YOU WOULD LIKE TO TALK FURTHER HERE IS MY
20 TELEPHONE NUMBER, PLEASE CALL ME, AND I WOULD BE CALLED.

21 Q. AND DID ALL THREE CALL YOU?

22 A. YES.

23 Q. AND ARE -- TO YOUR KNOWLEDGE ARE THOSE THREE STILL
24 CHURCH MEMBERS OR ARE THEY EX-MEMBERS?

25 MR. LEVY: I'M GOING TO OBJECT TO THAT, YOUR HONOR.
26 IRRELEVANT AS TO WHETHER THOSE PEOPLE ARE STILL IN THE CHURCH.

27 THE COURT: HE CAN ANSWER.

28 THE WITNESS: I REALLY DON'T KNOW. I DON'T FOLLOW THEM

1 OR TRACK THEM. I SIMPLY MAKE MYSELF AVAILABLE TO THEM.

2 Q. BY MR. KLEIN: HAVE YOU EVER BEEN TO CAMELOT?

3 A. ACTUALLY I HAVE. BUT BEFORE IT WAS CAMELOT, WHEN
4 IT WAS CLAREFIELD SEMINARY.

5 Q. MY QUESTION IS SINCE IT WAS TAKEN OVER BY CHURCH
6 UNIVERSAL TRIUMPHANT HAVE YOU BEEN?

7 A I HAVE DRIVEN PAST IT, BUT I HAVE NOT GONE IN.

8 Q. WHEN YOU HAD THAT TV PROGRAM THAT WAS IN 1983 I
9 THINK --

10 A. ABOUT.

11 Q WHEN YOU HAD THAT TV PROGRAM, YOU SAID THAT
12 SOMEBODY SUGGESTED TO YOU THAT THE CHURCH WAS DECREERING AGAINST
13 YOU?

14 A. YES.

15 MR. LEVY: I'M GOING TO OBJECT, YOUR HONOR, AT THIS
16 POINT. MR. KLEIN JUST SAID WHEN THE RABBI HAD A TV PROGRAM.
17 MY UNDERSTANDING IS HE WAS A GUEST. HE WAS ASKED TO BE ON ONE.
18 HE DIDN'T HAVE ONE AT HIS OPTION.

19 THE COURT: PLEASE REPHRASE IT.

20 MR. KLEIN: YES YOUR HONOR.

21 Q. WHEN YOU APPEARED ON THE TV PROGRAM THAT WAS
22 AROUND 1985, EARLY 1985?

23 A. APPROXIMATELY THAT.

24 Q. THAT'S WHEN YOU WERE TOLD THEY WERE DECREERING
25 AGAINST YOU?

26 A. YES.

27 Q. FROM THE MID 70'S OR WHENEVER IN THE 1970'S YOU
28 BECAME INTERESTED AND BEGAN RESEARCH IN CHURCH UNIVERSAL &

1 TRIUMPHANT UNTIL EARLY 1985 WHEN YOU WERE TOLD THAT THEY WERE
2 DECREETING AGAINST YOU, WAS THERE ANY REASON THAT YOU DIDN'T TRY
3 TO CONTACT THE CHURCH LEADERS AND ASK THEM IF YOU COULD COME UP
4 AND SPEAK TO THEM?

5 MR. LEVY: I'M GOING TO OBJECT TO THAT, YOUR HONOR.
6 RELEVANT —

7 THE COURT: HE CAN ANSWER IT.

8 THE WITNESS: OVER THE YEARS OF MY DEALING WITH
9 VARIETIES OF CULTS BOTH MY LIFE AND THE LIFE OF MY WIFE AND
10 CHILDREN HAVE BEEN THREATENED. WHEN I FIND MYSELF IN A
11 SITUATION WHERE I BELIEVE THAT VIOLENCE IS POSSIBLE, AND I HAVE
12 HAD THE EXPERIENCE OF PEOPLE FROM VARIOUS GROUPS THREATENING MY
13 LIFE AND THE LIFE OF MY FAMILY, I DO NOT ENTER THAT
14 ENVIRONMENT.

15 Q. HAVE YOU EVER BEEN THREATENED BY ANYBODY FROM
16 CHURCH UNIVERSAL & TRIUMPHANT?

17 A. NOT DIRECTLY.

18 Q. TO THE EXTENT THAT YOU FEEL THREATENED BY THEM, DO
19 YOU THINK THAT IN ANY WAY COULD AFFECT THE VALIDITY OF THE
20 CONCLUSION THAT YOU TESTIFIED TO THIS MORNING?

21 MR. LEVY: I'M GOING TO OBJECT TO THE FORM OF THE
22 QUESTION, YOUR HONOR. THIS WITNESS DID NOT TESTIFY THAT HE
23 FELT THREATENED. HE SIMPLY INDICATED THAT HE AND HIS FAMILY
24 HAD BEEN THREATENED.

25 THE COURT: JUST PLEASE STATE THE GROUNDS.

26 MR. LEVY: MISCHARACTERIZATION OF TESTIMONY.

27 THE COURT: SUSTAINED.

28 Q BY MR. KLEIN: THE SAME FEELINGS THAT YOU HAVE

1 DESCRIBED TO US A FEW MINUTES AGO ABOUT WHY YOU DID NOT ATTEMPT
2 TO GO TO CAMELOT DO YOU THINK HAVING THOSE FEELINGS IN ANY WAY
3 WOULD AFFECT THE VALIDITY OF YOUR CONCLUSIONS WITH RESPECT TO
4 THIS CASE?

5 A. I DON'T BELIEVE SO. I BELIEVE THAT THE
6 CONCLUSIONS I ARRIVE AT I ARRIVE AT HONESTLY. I MAKE
7 DISTINCTIONS ABOUT HUMAN BEINGS AND ORGANIZATIONS AND PEOPLE
8 WITHIN ORGANIZATIONS ON THE BASIS OF EACH INDIVIDUAL SITUATION.
9 I DON'T LABEL PEOPLE WITH BRUSHES.

10 Q. WHEN YOU -- PRIOR TO A MONTH AGO BEFORE MEETING
11 MR. MULL AND DISCUSSING THIS CASE, DID YOU HAVE ANY BIAS
12 WHATSOEVER AGAINST THIS CHURCH?

13 A. NO. I FELT GREAT CONCERN FOR THE PEOPLE WHO WERE
14 IN IT. I WOULD HAVE LIKED TO HAVE FOUND A WAY TO HELP. BUT
15 BIAS, NO.

16 Q. YOU SPOKE TO MR. MULL FOR THREE HOURS A MONTH AGO,
17 THAT WOULD BE 1986. NOW, THAT'S ABOUT 12 YEARS AFTER HE FIRST
18 BECAME INVOLVED WITH THIS CHURCH; IT'S ALSO ABOUT SIX YEARS
19 SINCE HE LEFT THIS CHURCH. DO YOU THINK THAT THE PASSAGE OF
20 TIME THAT HAS OCCURRED BETWEEN WHEN MR. MULL WAS AFFILIATED
21 WITH THIS CHURCH AND WHEN YOU INTERVIEWED HIM FOR THREE HOURS A
22 MONTH AGO WOULD IN ANY WAY AFFECT THE VALIDITY OF THE
23 INFORMATION THAT YOU RECEIVED FROM HIM AND THEN THE VALIDITY OF
24 YOUR CONCLUSIONS?

25 A. CERTAINLY THE PASSAGE OF TIME AFFECTS PERCEPTIONS
26 OF ALL KINDS OF THINGS. HOWEVER, IT'S BEEN MY EXPERIENCE IN
27 RELATIONSHIP TO CULTS AND OTHER IMPORTANT EMOTIONAL TRAUMAS
28 THAT PEOPLE GO THROUGH IS THAT THEIR CAPACITY TO REMEMBER THEM

1 AND RELIEVE THEM IS PROFOUND AND ACCURATE IN MANY, MANY WAYS.
2 IF I WAS TALKING ABOUT -- TO MR. MULL ABOUT AN IDLE
3 CONVERSATION THAT DID NOT HAVE GREAT IMPACT IN HIS LIFE, I
4 WOULD NOT EXPECT HIM TO REMEMBER IT ACCURATELY. BUT ACCORDING
5 TO THE PROCESS THAT I DESCRIBED OF MY INTERVIEWING HE CERTAINLY
6 VALIDATED TO ME THAT HE HAS THOSE EXPERIENCES PRETTY WELL IN
7 HAND.

8 Q. IN YOUR COUNSELING HAVE YOU EVER EXPERIENCED THAT
9 OVER THE YEARS AS YEARS PASS PEOPLE SOMETIMES THINK THAT THINGS
10 WERE MUCH WORSE THAN THEY ACTUALLY WERE BACK WHEN THE EVENTS
11 OCCURRED? HAS THAT EVERY HAPPENED TO YOU?

12 A. SOMETIMES. SOMETIMES THEY'RE THE OTHER WAY ALSO.
13 I THINK IT WOULD BE FOOLISH FOR US NOT TO EXPECT THAT TO
14 HAPPEN.

15 Q. THERE IS NO WAY TO KNOW IN ANY PARTICULAR CASE
16 WHETHER IT'S ONE WAY OR THE OTHER; IS THAT RIGHT?

17 A. NO, I DON'T THINK SO. I THINK THAT PEOPLE WHO ARE
18 TRAINED LISTENERS AND OBSERVERS WHO SPEND MANY YEARS OF THEIR
19 LIVES AS I HAVE LISTENING TO PEOPLE, THEIR PROBLEMS, THEIR
20 REALITIES AND DEALING WITH THEIR LIVES YOU DEVELOP BOTH A SKILL
21 AND A SENSITIVITY TO UNDERSTAND WHEN PEOPLE ARE SPEAKING THEIR
22 CLEAR PERCEPTION OF REALITY AND WHEN THEY'RE IN FACT
23 MANUFACTURING. THOSE OF US WHO HAVE DONE COUNSELING FOR
24 EXTENDED PERIODS OF TIME OVER YEARS END UP KNOWING WHEN PEOPLE
25 WALK INTO OUR OFFICE RELATIVELY SOON WHAT'S REALLY BOTHERING
26 THEM AND I HAVE LEARNED TO TRUST THAT CAPACITY OVER THE YEARS
27 AND IT'S ALWAYS STOOD ME IN VERY GOOD STEAD.

28 Q. AND YOU TRUST THAT CAPACITY TO THE EXTENT THAT YOU

1 DON'T EVEN INVESTIGATE THE FACTS?

2 A. IN TERMS OF MY JUDGMENTS ABOUT GREGORY MULL, I
3 TRUST MY CAPACITIES, YES.

4 MR. KLEIN: THANK YOU.

5 NO FURTHER QUESTIONS.

6 MR. LEVY: THANK YOU, YOUR HONOR. JUST A FEW QUESTIONS.

7

8 REDIRECT EXAMINATION

9 BY MR. LEVY:

10 Q. RABBI ROBBINS DID YOU GO TO AUSCHWITZ IN 1939
11 THROUGH 1942?

12 A. NO, I WAS NOT ALIVE THEN.

13 Q. DO YOU STILL REMEMBER THE REPORTED EVENTS THAT YOU
14 SAW ON THE NEWSREELS AND THE TELEVISION?

15 MR. KLEIN: I'M GOING TO OBJECT AS TO THE RELEVANCE,
16 YOUR HONOR.

17 THE COURT: OVERRULED.

18 THE WITNESS: OF COURSE, I DO. IN FACT ALL OF MY WIFE'S
19 FAMILY WERE THERE.

20 Q. DO YOU BELIEVE THAT WHAT YOU REMEMBER ABOUT WHAT
21 YOU LEARNED THAT MANY YEARS AGO IS ACCURATE IN YOUR MIND?

22 A. WITHOUT DOUBT.

23 Q. JUST ONE LAST QUESTION. CAN YOU CHARACTERIZE THE
24 TOTALITY OF GREGORY MULL'S EXPERIENCE WITH CHURCH UNIVERSAL &
25 TRIUMPHANT AND THE RESULTANT AFFECT THAT EXPERIENCE HAD UPON
26 HIM?

27 A. I WOULD CHARACTERIZE GREGORY MULL AS A MAN WHO
28 WANTED VERY MUCH TO FIND HIS GOD AND FOUND AN OPPORTUNITY

1 THROUGH WHAT HE THOUGHT WAS LOVE EXPRESSED TO HIM BY SOMEONE
2 WHO STOOD FOR GOD TO FIND THAT SENSE OF PEACE AND HAPPINESS.
3 IN REALITY I BELIEVE WHAT HE FOUND WAS AN ORGANIZATION WHO SAW
4 IN HIM GREAT OPPORTUNITIES FOR THEIR OWN GROWTH, FOR THEIR ON
5 FINANCIAL WELL-BEING. I THINK THEY SAW IN GREGORY MULL AN
6 OPPORTUNITY TO TAKE ADVANTAGE OF A MAN WITH SOME SUBSTANCE,
7 SOME MEANS, AND SOME TALENT, TO USE THAT TALENT TO THE UTMOST
8 THAT IT COULD AND THEN WHEN THEY WERE FINISHED WITH HIM TO
9 THROW HIM AWAY.

10 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

11 MR. KLEIN: JUST ONE QUESTION, YOUR HONOR.

12

13

RECROSS-EXAMINATION

14 BY MR. KLEIN:

15 Q. THAT CHARACTERIZATION THAT YOU JUST GAVE US THAT
16 WAS BASED ON WHAT GREGORY MULL TOLD YOU; IS THAT RIGHT?

17 A. THAT WAS BASED ON ALL OF THE INFORMATION I HAVE
18 GATHERED FROM ALL OF THE VARIOUS SOURCES INCLUDING GREGORY'S
19 STATEMENT.

20 Q. AS IT APPLIES TO GREGORY MULL, FACTS OF HIS
21 PARTICULAR SITUATION, IT'S BASED ON WHAT GREGORY TOLD YOU; IS
22 THAT RIGHT?

23 A. IT IS BASED UPON MY READING THE TRANSCRIPT OF THE
24 TAPE IN THE INTERVIEW IN WHICH GREGORY WAS SEATED WITH MONROE
25 SHEARER AND EDWARD FRANCIS AND ELIZABETH CLARE PROPHET. I
26 PERCEIVED IN THE READING OF THE TRANSCRIPT OF THAT TAPE AN
27 ENORMOUSLY DESTRUCTIVE AND MANIPULATIVE PROCESS IN WHICH THEY
28 RUNG OUT OF HIM EVERYTHING HE COULD GIVE; THEN WHEN THEY

1 FINISHED WITH HIM THEY TOLD HIM TO LEAVE.

2 Q. DID YOU LISTEN TO THE TAPE OR JUST READ THE
3 TRANSCRIPT?

4 A. I READ THE TRANSCRIPT.

5 Q. DO YOU KNOW IF DURING THE COURSE OF THE
6 CONVERSATION THEY YELLED AT HIM?

7 A. I DID NOT WANT TO LISTEN TO THE TAPE BECAUSE I
8 ONLY WANTED TO RELY ON WORDS. THE WORDS WERE STRONG ENOUGH FOR
9 ME EVEN ON THE BASIS OF THAT TO SEE THE STRENGTH OF WHAT
10 HAPPENED. ON THE BASIS OF WHAT GREGORY REPORTED TO ME, IT
11 WOULD HAVE BEEN IRRELEVANT WHETHER GREGORY WAS YELLED AT OR
12 WHISPERED AT.

13 HE BELIEVED IN ELIZABETH CLARE PROPHET SO
14 PROFOUNDLY THAT HE COULD RESIST THE COERCIVE INFLUENCE OF
15 MONROE SHEARER AND EDWARD FRANCIS. HE BELIEVED THAT WHAT WAS
16 DESTRUCTIVE IN THE CHURCH CAME NOT FROM ELIZABETH CLARE PROPHET
17 BUT FROM THE BOARD AND THE OTHER LEADERS AROUND HIM. BUT WHEN
18 HE FINALLY CONFRONTED HER AND SHE REJECTED HIM AND TOOK AWAY
19 HIS PLACE IN THE WORLD, HE HAD NO PLACE ELSE TO GO; THAT IS
20 CLEARLY REFLECTED IN THE TRANSCRIPT OF THAT TAPE AS FAR AS I'M
21 CONCERNED.

22 Q. YOU PLACE GREAT RELIANCE ON THAT TRANSCRIPT?

23 A. YES.

24 Q. DID YOU THINK IF YOU WERE GOING TO PLACE GREAT
25 RELIANCE ON IT THAT IT MIGHT HAVE BEEN VALUABLE TO LISTEN TO
26 THE ACTUAL TAPE AND HEAR THE PEOPLE, WHAT THEY SAID AND THE WAY
27 THEY SAID IT?

28 A. NO. BECAUSE MY PERCEPTION IS THAT THE WORDS STAND

1 FOR THEMSELVES. I READ THOSE WORDS TRYING TO BE AS NEUTRAL AS
2 POSSIBLE. TO PUT THEM IN CONTEXT IN WHICH I WOULD HEAR EMOTION
3 WHICH MIGHT HAVE BEEN MANUFACTURED OR USED AS A MANIPULATIVE
4 DEVICE, I DON'T THINK WOULD HAVE BEEN AS EFFECTIVE AS MY SIMPLY
5 GOING THROUGH THAT TRANSCRIPT.

6 MR. KLEIN: THANK YOU.

7 NO FURTHER QUESTIONS.

8 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

9 THE COURT: ALL RIGHT.

10 THANK YOU, RABBI ROBBINS. YOU ARE EXCUSED.

11 THE WITNESS: THANK YOU.

12 MR. LEVY: MAY WE HAVE JUST A MOMENT BEFORE WE CALL OUR
13 NEXT WITNESS?

14 THE COURT: CERTAINLY.

15 (COUNSEL CONFERS WITH CO-COUNSEL.)

16 MR. LEVY: THANK YOU.

17 YOUR HONOR, AT THIS TIME WE WOULD CALL MISS
18 KATHLEEN LEVY TO THE STAND.

19

20 KATHLEEN LEVY,

21 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED
22 AS FOLLOWS:

23 THE CLERK: PLEASE BE SEATED IN THE WITNESS STAND.
24 PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR
25 FIRST AND LAST NAME.

26 THE WITNESS: KATHLEEN LEVY, K-A-T-H-L-E-E-N L-E-V-Y.

27 THE CLERK: THANK YOU.

28 /

1 DIRECT EXAMINATION

2 BY MR. MIDDLETON:

3 Q. WHAT IS YOUR OCCUPATION?

4 A. I AM A MARRIAGE, FAMILY, CHILD COUNSELOR.

5 Q. AND ARE YOU LICENSED?

6 A. YES, I AM.

7 Q. AND BY WHAT STATE?

8 A. CALIFORNIA.

9 Q. AND WHEN WERE YOU SO LICENSED?

10 A. 1984.

11 Q. WHAT EXACTLY IS A MARRIAGE, FAMILY, CHILD
12 COUNSELOR?13 A. A MARRIAGE, FAMILY, CHILD COUNSELOR WORKS WITH
14 INDIVIDUALS, COUPLES, FAMILIES, WORKS WITH PSYCHOLOGICAL AND
15 EMOTIONAL PROBLEMS.16 Q. WHAT ARE THE REQUIREMENTS OF A MARRIAGE, FAMILY,
17 CHILD COUNSELOR IN TERMS OF LICENSING?18 A. YOU NEED A BACHELOR'S DEGREE, YOU NEED A MASTER'S
19 DEGREE AND 3,000 HOURS OF SUPERVISED PRACTICAL.

20 Q. SUPERVISED PRACTICAL?

21 A. PRACTICAL EXPERIENCE UNDER A LICENSED SUPERVISOR.

22 Q. AND HAVE YOU FULFILLED THOSE REQUIREMENTS?

23 A. YES, I HAVE.

24 Q. YOU SAY A MASTER'S DEGREE. WHERE DID YOU GET YOUR
25 MASTER'S DEGREE?

26 A. CALIFORNIA FAMILY STUDY CENTER.

27 Q. IS THAT A STATE APPROVED AND STATE ACCREDITED
28 INSTITUTION?

1 A. YES, IT IS.

2 Q. AND YOUR BACHELOR'S DEGREE WHERE DID YOU GET THAT?

3 A UWW INTERNATIONAL IN SANTA MONICA.

4 Q. WHAT IS UWW INTERNATIONAL?

5 A. UNIVERSITY WITHOUT WALLS. THEY OFFER A ONE YEAR
6 TUTORIAL PROGRAM THAT COMBINES TUTORIAL STUDY GROUP
7 PARTICIPATION IN CLASSES, PROFESSIONAL TRAINING. YOU EARN
8 CREDITS BY WRITING TREATISES AND DOING DISSERTATION ON LIFE
9 EXPERIENCES.

10 Q. IS THAT ORGANIZATION STATE APPROVED OR STATE
11 ACCREDITED?

12 A. IT'S STATE APPROVED.

13 Q. AND DO YOU RECALL WHEN YOU ATTENDED UWW AND WHEN
14 YOU ATTENDED THE OTHER SCHOOL THAT YOU MENTIONED FOR YOUR
15 MASTER'S DEGREE?

16 A. 1981 UWW AND THE MASTERS WAS IN 1983 I BECAME
17 LICENSED. I MEAN I GOT MY CREDENTIAL IN 1983.

18 Q. IN 1983. DO YOU HAVE ANY PRIOR TRAINING TO THE —
19 GOING TO UWW.

20 A. YES, I DO.

21 Q. WHAT TRAINING IS THAT?

22 A. I HAVE A ONE YEAR PROGRAM OF BEING TRAINED TO BE A
23 HYPNOTHERAPIST FROM HYPNOSIS MOTIVATION INSTITUTE AND I WENT
24 THERE IN 1975 AND THEN I WAS THERE ON STAFF FOR FIVE YEARS.

25 Q. YOU WERE THERE FOR FIVE YEARS TOTAL OR WAS IT SIX
26 YEARS?

27 A. SIX YEARS TOTAL, ONE YEARS TRAINING AND SIX YEARS
28 AS A STAFF MEMBER.

1 Q. DID YOU RECEIVE ANY CREDENTIALS OR DEGREES WHILE
2 YOU WERE THERE FROM THAT PLACE?

3 A. I WAS CERTIFIED AS A HYPNOTHERAPIST AND THEN A
4 MASTER HYPNOTIST.

5 Q. THAT'S A TITLE THAT PLACE ISSUED TO YOU AS A
6 MASTER HYPNOTIST?

7 A. YES.

8 Q. WHAT IS HYPNOSIS?

9 A. HYPNOSIS IS AN ALTERED STATE OF CONSCIOUSNESS.

10 Q. WOULD YOU EXPLAIN TO US HOW HYPNOSIS WORKS.

11 A. HYPNOSIS ONE OF THE THINGS THAT YOU DO IS TO FOCUS
12 THE PERSON'S ATTENTION, FOCUS THEIR CONCENTRATION; THAT CAN BE
13 DONE THROUGH VARIOUS METHODS AND THEN YOU GET THE PERSON TO PUT
14 THEIR CONSCIOUS MIND IN ABEYANCE. YOU BYPASS THE CRITICAL AREA
15 OF MIND; THE CRITICAL AREA OF MIND IS THAT AREA OF MIND THAT
16 EITHER ACCEPTS OR REJECTS SUGGESTIONS AND THEN YOU GET TO THE
17 UNCONSCIOUS MIND THAT TAKES IN EVERYTHING LITERALLY AND FREELY.

18 MR. MIDDLETON: IF I MIGHT, YOUR HONOR.

19 Q IF I JUST DRAW A DIAGRAM HERE AND HAVE A
20 REPRESENTATION OF THIS LINE BEING THE CONSCIOUS MIND, THIS
21 MIND -- THIS STAR HERE BEING THE CRITICAL AREA AND THEN THIS
22 BACK HERE WHAT WOULD YOU CALL THAT?

23 A. THAT'S THE SUBCONSCIOUS MIND.

24 Q. ALL RIGHT. AND THE PROCESS OF HYPNOSIS GETS A
25 PERSON TO LAY ASIDE THE CONSCIOUS PART OF THEIR MENTALITY?

26 A. THAT'S RIGHT.

27 Q. AND THEN BYPASSES THE CRITICAL AREA?

28 A. UH-HUH.

1 Q. WHAT HAPPENS TO ANY SUGGESTION AT THAT POINT THAT
2 IS PLACED TO THE MENTALITY?

3 A. IT'S TAKEN IN LITERALLY AND FREELY.

4 Q. IT DOESN'T DISCRIMINATE BETWEEN YES, NO, WHETHER
5 TO TAKE IT IN, WHETHER NOT TO TAKE IT?

6 A. THAT'S RIGHT.

7 Q. IT JUST TAKES IT IN?

8 A. THAT'S RIGHT.

9 Q. DO YOU KNOW GREGORY MULL?

10 A. YES, I DO.

11 Q. AND HOW DID YOU FIRST MEET GREGORY MULL?

12 A. THROUGH MY HUSBAND LAWRENCE LEVY.

13 Q. AND WOULD YOU DESCRIBE THAT FIRST MEETING TO US.

14 A. IT WAS IN 1981, EITHER APRIL OR MAY AND LARRY
15 INTRODUCED ME TO GREGORY MULL. WE SAT AND WE TALKED FOR A FEW
16 MINUTES AND THEN I SAID GOOD-BYE TO HIM.

17 Q. WAS THERE ANY SUBSEQUENT MEETINGS WITH GREGORY
18 MULL?

19 A. I STARTED COUNSELING WITH GREGORY MULL SEVERAL
20 MONTHS LATER. IT WAS IN SEPTEMBER OR OCTOBER OF THE SAME YEAR.

21 Q. YOU BEGAN COUNSELING WITH HIM?

22 A. YES.

23 Q. IN WHAT CAPACITY DID YOU COUNSEL WITH HIM?

24 A. AS A HYPNOTHERAPIST, LAY HYPNOTIST.

25 Q. YOU WERE NOT LICENSED AT THAT TIME AS A MARRIAGE,
26 FAMILY, CHILD COUNSELOR?

27 A. NO, I WASN'T.

28 Q. UNDER WHAT AUTHORITY DID YOU WORK WITH MR. MULL AT

1 THAT TIME?

2 A. 2908 OF THE BUSINESS AND PROFESSIONS CODE ALLOWS A
3 LAY HYPNOTIST TO WORK WITH INDIVIDUALS ON AVOCATIONAL AND
4 VOCATIONAL SELF-IMPROVEMENT. AND ALSO I WAS WORKING UNDER THE
5 SUPERVISION OF JAY BARTEL WHO WAS A LICENSED THERAPIST AT THE
6 TIME, FAMILY THERAPIST.

7 Q. AND GOING BACK ONE MOMENT. WHEN YOU GOT YOUR
8 CERTIFICATE OR DEGREE AS A MARRIAGE, FAMILY, CHILD COUNSELOR
9 YOU INDICATED THEREIN THAT IT REQUIRED 3,000 HOURS OF PRACTICAL
10 TRAINING. WAS THIS PART OF THAT?

11 A. YES.

12 Q. AND IN FACT HOW MANY HOURS DID YOU HAVE WHEN YOU
13 GOT THAT LICENSE?

14 A. SIX THOUSAND HOURS.

15 Q. AND WHILE GREGORY MULL SAW YOU, DID YOU CHARGE HIM
16 FOR THE SESSIONS?

17 A. YES, I DID.

18 Q. AND HOW MUCH WAS YOUR FEE?

19 A. THEY WERE \$40.00 AN HOUR.

20 Q. AND DID HE PAY FOR ALL THE SESSIONS THAT HE HAD
21 WITH YOU?

22 A. NO, HE HASN'T.

23 Q. THERE CAME A TIME WHEN HE DID NOT PAY?

24 A. THAT'S RIGHT.

25 Q. WHAT HAPPENED?

26 A. WELL, HE PAID THE SECOND AND THIRD SESSION, I
27 BELIEVE, AND THEN HE SAID TO ME THAT HE COULDN'T COME AND SEE
28 ME ANYMORE BECAUSE HE DIDN'T HAVE THE MONEY. I SAID, GREGORY,

1 I BELIEVE THAT YOU NEED HELP AND I'M WILLING TO DEFER MY
2 PAYMENT, TO DEFER THIS PAYMENT TO ME, UNTIL A LATER TIME UNTIL
3 YOU CAN AFFORD TO PAY ME.

4 Q. IS THAT THE AGREEMENT THAT YOU REACHED UPON?

5 A. THAT'S RIGHT.

6 Q. WAS THERE A SUBSEQUENT AGREEMENT AFTER THAT?

7 A. IN REGARD TO PAYMENT?

8 Q. YES. IN REGARD TO PAYMENT. HAS THERE BEEN A
9 DOLLAR AMOUNT SET THAT HE WOULD PAY YOU.

10 A I TOLD HIM I WOULD NEVER GO OVER \$5,000.00, THAT
11 THAT WOULD BE ENOUGH. I DIDN'T WANT HIM TO WORRY ABOUT IT. HE
12 WAS VERY WORRIED ABOUT PAYING ME.

13 Q. HE WAS CONCERNED ABOUT FINANCES AT THAT POINT?

14 A. EXTREMELY.

15 Q. NOW, LET'S GO BACK TO THE SESSIONS THEMSELVES.

16 WHEN -- HOW DID MR. MULL FIRST COME INTO YOUR
17 OFFICE FOR COUNSELING? CAN YOU RECALL THAT FIRST SESSION?

18 A. YES, I CAN. HE CAME TO SEE LARRY AND -- AFTER
19 LARRY HAD SEEN HIM LARRY CAME AND ASKED ME IF I HAD TIME IF I
20 WOULD SEE GREGORY, THAT HE SEEMED TO BE VERY NERVOUS AND VERY
21 FEARFUL. I SAID YES, I HAVE TIME AND I'LL BE GLAD TO WORK WITH
22 HIM.

23 Q. AND SO DID YOU WORK WITH HIM AT THAT TIME?

24 A. YES, I DID.

25 Q. FROM YOUR OBSERVATION OF HIM WHEN HE FIRST CAME
26 IN, WHAT IS YOUR OBSERVATION OF THE INDIVIDUAL AT THAT FIRST
27 MEETING?

28 A. THAT FIRST MEETING GREGORY MULL WAS VERY FEARFUL,

1 EXTREMELY ANXIOUS, HIS SPEECH WAS PRESSURED, HE HAD A DIFFICULT
2 TIME RELATING HIS PROBLEM TO ME, TELLING ME HIS EXPERIENCES
3 THAT HAPPENED TO HIM AT CAMELOT. HE WAS JUST VERY, VERY
4 NERVOUS. HE TOLD ME THAT HE WAS.

5 Q. THAT WAS YOUR OBSERVATION. I WILL GET TO THE
6 REST. DURING THE TIME DID YOU TAKE NOTES?

7 A. NO, I DIDN'T.

8 Q. IS IT YOUR CUSTOM AND PRACTICE TO TAKE NOTES?

9 A. NO.

10 Q. IS THERE A REASON THAT YOU DID NOT TAKE NOTES?

11 A. I DIDN'T NEED TO. WORKING AS A LAY HYPNOTIST WHAT
12 I WAS GOING TO WORK WITH WERE THE OBSERVABLE SYMPTOMS OF HIS
13 FEAR AND HIS ANXIETY TO ALLEVIATE THE STRESS HE WAS
14 EXPERIENCING.

15 Q. WHAT WERE MR. MULL'S COMPLAINTS TO YOU AT THE
16 TIME, IF YOU CAN RECALL?

17 A. HE SAID THAT HE WAS TERRIFIED ALL OF THE TIME,
18 THAT HE WAS EXTREMELY NERVOUS, THAT HE COULDN'T SLEEP, THAT HE
19 WAS CONSTANTLY HAVING NIGHTMARES WHERE HE WAS FEARING THE LOSS
20 OF HIS SOUL AND THE DAMNATION OF HIS SOUL AND THESE NIGHTMARES
21 HAD TO DO WITH ELIZABETH DAMNING HIS SOUL TO HELL. HE SAID
22 THAT EVER SINCE HE HAD BEEN KICKED OUT OF THAT HE WAS BEING
23 HARASSED CONTINUALLY, A DAILY BASIS, THAT HE WAS GETTING PHONE
24 CALLS TWO AND THREE AND FOUR TIMES A NIGHT WAKING HIM UP, JUST
25 GENERALLY BEING HARASSED.

26 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THOSE LAST
27 STATEMENTS AS HEARSAY, ASK THAT THEY BE STRICKEN FROM THE
28 RECORD OR ELSE THAT AN INSTRUCTION BE GIVEN.

1 THE COURT: THE JURY MAY CONSIDER THE LAST STATEMENTS OF
2 THE WITNESS AS EVIDENCE OF STATEMENTS MADE BY MR. MULL TO HER
3 NOT AS EVIDENCE OF THE TRUTH OF THE CONTENTS OF THE STATEMENTS
4 THEMSELVES. AND IF WE REACH THAT POINT YOU MAY ALSO CONSIDER
5 THOSE STATEMENTS AS HAVING BEEN MADE AS A FOUNDATION FOR THINGS
6 THAT THE WITNESS MAY HAVE DONE OR NOT DONE. WE WILL FIND OUT
7 AS SHE TESTIFIES.

8 MR. MIDDLETON: THANK YOU, YOUR HONOR.

9 Q. AS YOU OBSERVED GREGORY MULL, WHAT WERE THE STRESS
10 FACTORS IN YOUR OPINION AS YOU OBSERVED HIM?

11 A. WHAT WERE THE STRESS FACTORS?

12 Q. RIGHT?

13 A. IT --

14 MR. KLEIN: I'M GOING TO OBJECT AS VAGUE AND AMBIGUOUS.

15 MR. MIDDLETON: I WILL REPHRASE THE QUESTION, YOUR
16 HONOR. I'M SORRY.

17 Q. DID YOU OBSERVE GREGORY MULL UNDER STRESS?

18 A YES.

19 Q. WHAT WERE THE FACTORS THAT PERCIPITATED THAT
20 STRESS.

21 MR. KLEIN: I'M GOING TO OBJECT AS TO THE FOUNDATION FOR
22 THIS WITNESS TO ANSWER THAT QUESTION BASED ON HER TRAINING.

23 THE COURT: WHY DON'T ASK YOU A FEW QUESTIONS.

24 MR. MIDDLETON: WITH REGARD TO HER ABILITY TO COUNSEL AT
25 THIS POINT, YOUR HONOR, SHE HAS ALREADY TESTIFIED SHE DID IT
26 UNDER A LAY HYPNOTIST UNDER THE BUSINESS AND PROFESSIONS CODE.

27 THE COURT: COUNSEL SEEMS TO BE CONCERNED ABOUT STRESS.
28 WHY DON'T YOU ASK HER.

1 MR. KLEIN: MAY I TAKE HER ON VOIR DIRE, YOUR HONOR, AT
2 THIS POINT?

3 THE COURT: OKAY.

4 MR. KLEIN: THANK YOU.

5

6

VOIR DIRE EXAMINATION

7 BY MR. KLEIN:

8 Q. AM I CORRECT THAT AS A HYPNOTIST YOU WERE TRAINED
9 TO DEAL WITH OBSERVABLE SYMPTOMS BUT NOT TRAINED TO ANALYZE THE
10 CAUSE OF THOSE SYMPTOMS?

11 A. THAT'S RIGHT.

12 Q SO THAT IF SOMEBODY HAD STRESS YOU CERTAINLY COULD
13 TREAT THEM FOR THE STRESS BUT YOU DID NOT HAVE ANY EXPERTISE TO
14 DETERMINE WHAT CAUSED THAT STRESS?

15 A. THAT'S RIGHT.

16 MR. KLEIN: THANK YOU.

17 NO FURTHER QUESTIONS. THANK YOU.

18 Q. BY MR. MIDDLETON: DID YOU OBSERVE STRESS?

19 A. YES, I DID.

20 Q. AND WHAT DID YOU DO TO HELP GREGORY MULL WITH THAT
21 STRESS?

22 A. I GAVE GREGORY MULL THE OPPORTUNITY TO VENTILATE
23 ALL OF HIS FEARS AND HIS ANXIETIES. I WAS SUPPORTIVE OF HIM.
24 I PUT HIM IN HYPNOSIS. I TAUGHT HIM SELF-HYPNOSIS. I TAUGHT
25 HIM IMAGERY. I GAVE HIM A POST -- MAYBE ALTERNATIVE THOUGHTS
26 OR ATTITUDES.

27 Q. WHEN YOU SAY THAT YOU WORKED WITH MR. MULL IN
28 HYPNOSIS WAS, MR. MULL SUSCEPTIBLE TO HYPNOSIS?

1 A YES, HE WAS.

2 Q DID HE TALK OF HIS EXPERIENCES AT CAMELOT?

3 A. YES, HE DID.

4 MR. MIDDLETON: THERE IS A DECREE HERE IN EVIDENCE, YOUR
5 HONOR, I FORGET THE NUMBER OF IT --

6 MR. LEVY: I THINK IT'S 107.

7 MR. MIDDLETON: I AM SORRY. IT'S ANOTHER TAPE.

8 Q. I HAVE A TAPE THAT'S MARKED FOR IDENTIFICATION AS
9 NUMBER 95 AND THAT TAPE SAYS DYNAMIC DECREES BY THE STAFF. DID
10 YOU HAVE AN OPPORTUNITY TO LISTEN TO THAT TAPE?

11 A. YES, I HAVE.

12 Q. YOU HAVE AND YOU RECOGNIZE THIS AS THE TAPE THAT
13 YOU LISTENED TO?

14 A. YES.

15 Q HAVE YOU FORMED AN OPINION AS TO WHETHER OR NOT
16 THAT TAPE CAN BE USED AS A HYPNOTIC TOOL?

17 A. ABSOLUTELY, IT CAN.

18 Q. WHAT DO YOU BASE THAT OPINION ON?

19 A. WHAT I HAVE STUDIED, WHAT I HAVE LEARNED, THE FACT
20 THAT -- THAT ANY TIME YOU FOCUS A PERSON'S MIND ON A REPEATED
21 PHRASE CONTINUALLY FOR ANY LENGTH OF TIME THAT THEIR CONSCIOUS
22 MIND WILL BE PUT ASIDE, THE CRITICAL AREA OF MIND WILL BE
23 BYPASSED AND THEY'LL GO INTO HYPNOTIC STATE.

24 Q. AND IF SOMEONE WERE TO DECREE IN THE FASHION THAT
25 IS ON THAT TAPE AND DO THAT TYPE OF DECREE HOW LONG WOULD IT
26 TAKE FOR A PERSON TO FALL INTO A HYPNOTIC STATE?

27 A. IT DEPENDS ON THE INDIVIDUAL. IT WOULD BE FROM
28 TWO MINUTES TO LET'S SAY 15, 20 MINUTES ON THE AVERAGE.

1 Q. CAN EVERYONE BE HYPNOTIZED?

2 A. MOST EVERYONE. BUT PSYCHOTICS CANNOT OR MOST OF
3 THEM CAN'T BE.

4 Q IF SOMEONE IS OPPOSING HYPNOSIS CAN THEY BE
5 HYPNOTIZED?

6 A. GENERALLY, IF THEY'RE CONSCIOUSLY AWARE THAT
7 THEY'RE OPPOSING IT?

8 Q. YES.

9 A. NO. THEY COULD RESIST IT IF THEY'RE AWARE.

10 Q. IF THEY'RE UNAWARE?

11 A. THEY COULD BE PUT IN.

12 Q. THEY COULD BE PLACED IN?

13 A. YES.

14 Q. I WISH TO ASK YOU A HYPOTHETICAL QUESTION.

15 YOUR HONOR, I WOULD LIKE TO MARK THIS NEXT IN
16 ORDER AND IT'S NUMBER 108. NOW MY HYPOTHETICAL.

17 MR. LEVY: WHY DON'T YOU LET MR. KLEIN EXAMINE THAT.

18 Q. BY MR. MIDDLETON: MY HYPOTHETICAL QUESTION TO YOU
19 IS THIS. LET'S ASSUME THAT SOMEONE HAS BEEN DECREERING FOR A
20 MINIMUM OF A HALF HOUR AND UP TO PERHAPS AS LONG AS TWO
21 HOURS -- LET'S MAKE THAT AS THE FIRST ASSUMPTION AND THEN THAT
22 PERSON -- LET'S -- I'M SORRY. LET'S BEGIN AGAIN. THE FIRST
23 ASSUMPTION IS THAT SOMEONE HAS BEEN IN THE PROCESS OF DECREERING
24 IN A CLOSED ENVIRONMENT FOR AS LONG AS SIX WEEKS TWO TO THREE
25 HOURS A DAY, AFTER THAT PERIOD OF TIME THEY HAVE DECREED FOR
26 APPROXIMATELY TWO HOURS OR ONE-HALF HOUR TO TWO HOURS AND THEY
27 ARE TAKEN OUT OF A CROWD SITUATION AND PLACED HAD IN FRONT OF
28 SOMEONE AT THEIR KNEES, AT THE KNEES OF THE PERSON STANDING IN

1 FRONT OF THEM AND THAT PERSON IS HOLDING A SWORD SOMEWHAT
2 SIMILAR TO THAT, THAT THAT PERSON WILL PASS THE SIDE OF THE
3 PERSON KNEELING ACROSS THE TOP DOWN THE OTHER SIDE AND WILL
4 COME OVER IN FRONT OF THEM, PASS IT UP IN FRONT DOWN THE BACK
5 OR IN THE ALTERNATIVE THAT PERSON MAY LAY THEIR HAND ON THE
6 BACK AND ON THE FRONT OF THE ONE KNEELING AND IN THAT POSITION
7 SOMETHING SIMILAR TO THIS OCCURS THERE IS AN INVOCATION, IN THE
8 NAME OF THE CHRIST AND THE HOLY CHRISTSELS OF THE MESSENGERS,
9 I CALL TO BELOVED ASTREYA TO LOCK YOUR COSMIC SWORD OF BLUE
10 FLAME IN THROUGH AND AROUND THE CAUSE AND CORE OF ALL ENERGY
11 COMING THROUGH. BLUE LIGHTNING BOMBS DESCEND, BLUE LIGHTNING
12 BOMBS DESCEND, BLUE LIGHTNING BOMBS DESCEND. BLAZE THROUGH,
13 BLAZE THROUGH, BLAZE THROUGH. SEIZE, PIN AND BIND, SEIZE, PIN
14 AND BIND, SEIZE, PIN AND BIND. BURN OUT ALL ENERGY. BIND THIS
15 SUBSTANCE AND TAKE IT BACK TO THE GREAT CENTRAL SUN, AND THIS
16 OCCURS FOR PERHAPS AS LONG AS FIVE TO TEN MINUTES WITH THE
17 PERSON STANDING WAIVING THE SWORD OVER HIM AND IT'S DONE IN
18 TERMS OF AN EXORCISM WHAT AFFECT WOULD THAT HAVE ON THE
19 INDIVIDUAL, IF YOU HAVE AN OPINION?

20 MR. KLEIN: YOUR HONOR, I WOULD OBJECT FIRST OF ALL THAT
21 THE HYPOTHETICAL HAS FACTS THAT ARE NOT IN EVIDENCE. THIS
22 SWORD IS NOT IN EVIDENCE. THERE HAS BEEN NO TESTIMONY RELATING
23 TO IT. THERE ARE A NUMBER OF OTHER ASPECTS OF IT THAT ARE NOT
24 IN EVIDENCE AND THAT WOULD BE MY FIRST OBJECTION.

25 MR. LEVY: MAY WE RESPOND, YOUR HONOR.

26 THE COURT: WHY DON'T YOU APPROACH THE BENCH.

27 (THE FOLLOWING PROCEEDINGS WERE HELD AT THE BENCH
28 OUT OF THE HEARING OF THE JURY.)

1 MR. LEVY: MISS PROPHET ON HER DIRECT TESTIMONY TOLD US
2 THAT IT WAS A SERMON, THERE WAS A SWORD USED, THERE WAS A
3 RITUAL THAT WAS EMPLOYED WHEN THE CLEARANCE LETTERS WERE
4 BURNED. WE HAVE DONE NO MORE THAN LAY THE EXACT SAME SCENARIO
5 SHE TESTIFIED TO.

6 THE COURT: SHE MENTIONED A SWORD?

7 MR. LEVY: YES, SIR, SHE CERTAINLY DID.

8 MR. MIDDLETON: THE THE COLOR OF THE WORD IS NOT BLUE
9 THAT SHE USES. THIS IS A SWORD SHE ACTUALLY USED.

10 MR. KLEIN: I WOULD OBJECT FIRST OF ALL THERE IS NO
11 EVIDENCE AS TO WHAT THIS SWORD IS. NO ONE HAS TESTIFIED AS TO
12 WHAT THIS SWORD IS. BUT IN ADDITION TO THAT THEY SAID IN A
13 CLOSED ENVIRONMENT FOR TWO OR THREE HOURS A DAY FOR SIX WEEKS.
14 THERE IS NO TESTIMONY THAT THERE WAS A CLOSED ENVIRONMENT TWO
15 OR THREE HOURS A DAY FOR SIX WEEKS. THERE IS NO TESTIMONY THAT
16 AS FAR AS THE SWORD BEING PLACED UP AND FIVE OR TEN MINUTES OF
17 THINGS OCCURRING, THINGS OCCURRING FIVE OR TEN MINUTES. THERE
18 ARE A LOT OF THINGS IN THIS HYPOTHETICAL THERE IS NO TESTIMONY
19 IN THE CASE.

20 ALTHOUGH RANDALL KING SAID SOME DECREE OR THERE
21 WAS A DECREE HERE NO ONE HAS SAID THAT THAT DECREE WAS USED IN
22 CONJUNCTION WITH SOME SWORD AT THE CONFESSIONAL. THERE JUST
23 HASN'T BEEN THAT TESTIMONY. THEY HAVE TAKEN A LOT OF LITTLE
24 THINGS AND TRIED TO THROW IT INTO A HYPOTHETICAL THAT JUST
25 DOESN'T SUIT THE FACTS.

26 MR. MIDDLETON: YOUR HONOR, IF NECESSARY, WE WILL CALL
27 FORTH THE WITNESS THAT IT WAS DONE TO. IT'S GREGORY MULL. AND
28 WE WILL CALL FORTH ALSO RANDALL KING WHO WILL TESTIFY THIS WAS

1 DONE TO EVERYONE THAT WENT TO SUMMIT UNIVERSITY. NOT JUST ONE,
2 EVERYONE.

3 THE COURT: I THINK YOU HAD BETTER DO IT THEN.

4 MR. LEVY: THIS IS ALSO -- IF I MAY, YOUR HONOR. THIS
5 IS ALSO A HYPOTHETICAL TO ONLY MAKE ONE POINT. THE
6 HYPOTHETICAL IS TO MAKE THE POINT WHETHER OR NOT THIS KIND OF
7 CEREMONY COULD IMPRINT SOMEONE IN HYPNOTIST. ^ESTAGE

8 THE COURT: EACH OF THE FACTS HAS TO HAVE BEEN
9 ESTABLISHED. I THINK YOU HAD BETTER.

10 MR. LEVY: THE FACTS --

11 THE COURT: FROM WHAT YOU'RE TELLING ME, IT'S WITHIN
12 YOUR ABILITY TO DO THAT. SO I THINK YOU HAD BETTER DO IT.

13 MR. MIDDLETON: WE CAN CALL RANDALL KING NOW. GREGORY
14 MULL WILL HAVE TO BE CALLED LATER.

15 THE COURT: ANY WITNESS WOULD -- CAN DO IT.

16 MR. MIDDLETON: YOU WISH TO GO THROUGH THAT PROCESS NOW?

17 THE COURT: THE WITNESS WHO TESTIFIES DOES NOT HAVE TO
18 BE PLEASING TO MR. KLEIN. IT CAN BE ANY TESTIMONY.

19 MR. KLEIN: MIGHT I JUST ASK ONE QUESTION, YOUR HONOR?
20 MAYBE I CAN GET AN IDEA WHAT YOUR HONOR'S THINKING IS.

21 THE COURT: I THOUGHT I MADE IT QUITE CLEAR.

22 MR. KLEIN: YOU DID EXCEPT FOR ONE THING. TO THE EXTENT
23 THAT IT'S RELEVANT TO THIS CASE WOULDN'T IT BE NECESSARY FOR
24 GREGORY MULL TO TESTIFY THAT THAT'S ACTUALLY WHAT HAPPENED TO
25 HIM AS OPPOSED TO RANDALL TESTIFYING THAT AT SOMETIME THEY DID
26 THAT?

27 MR. MIDDLETON: MR. GREGORY HAS TESTIFIED HE WENT
28 THROUGH CLEARANCE AND EXORCISM.

1 MR. KLEIN: I'M TALKING ABOUT THE PARTICULAR PROCEDURE
2 THAT WE'RE DISCUSSING. IN ORDER TO BE RELEVANT, IT WOULD SEEM
3 THAT GREGORY MULL WILL HAVE TO TESTIFY.

4 THE COURT: THEY CAN ESTABLISH IT THROUGH RANDALL KING.
5 IF THEY WISH TO FIRM UP THE LINK WITH GREGORY MULL, THAT'S A
6 MATTER FOR THEM TO HANDLE.

7 MR. LEVY: LET ME ASK YOU THIS QUESTION. DO YOU WANT US
8 TO PUT RANDALL KING BACK ON THE STAND OR DO YOU WANT US TO
9 MINIMIZE THIS HYPOTHETICAL AND BE DONE WITH IT?

10 MR. KLEIN: I WOULD --

11 MR. LEVY: YOUR OPTION.

12 MR. KLEIN: ALL I CAN SAY IS THAT IF YOU HAD SOME TIME
13 TO TALK TO ME AND TELL ME JUST WHAT HE'S GOING TO TESTIFY TO, I
14 MIGHT AGREE TO STIPULATE.

15 MR. LEVY: I'M NOT GOING TO TALK TO YOU.

16 MR. MIDDLETON: WE CAN DO THAT. HE'S GOING TO TESTIFY
17 THAT HE WAS THERE, THAT THAT SWORD WAS ONE OF THE SWORDS THAT
18 WAS USED, THE SWORD THAT IS NOW USED IS BLUE, HE TOOK THAT
19 SWORD WITH HIM WHEN HE LEFT. HE WITNESSED THOSE THINGS, THAT
20 EVERYONE WHO WENT TO SUMMIT UNIVERSITY HAD TO GO THROUGH THAT
21 CLEARANCE PROCEDURE, IT'S PART OF THE EXORCISM AT THE TIME OF
22 THE CLEARANCE LETTER. I WILL CLARIFY CLOSED ENVIRONMENT TO
23 BECOME WHILE AT SUMMIT UNIVERSITY, AT CAMELOT. ANYTHING ELSE
24 THAT YOU NEED CLARIFIED?

25 MR. LEVY: YOU WANT US TO DO THAT?

26 MR. KLEIN: JUST A MINUTE. MAY I JUST ALSO TALK TO MY
27 CLIENT FOR ONE MOMENT, SEE IF WE CAN SAVE SOME TIME HERE?

28 THE COURT: LET'S MOVE ALONG. OKAY. GO AHEAD.

1 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT.)

2 MR. LEVY: YOUR HONOR, WE'RE READY TO PROCEED AT THIS
3 TIME.

4 MR. MIDDLETON: I BELIEVE WE'RE READY TO PROCEED, YOUR
5 HONOR.

6 Q I WISH TO CHANGE THE HYPOTHETICAL IN ONE REGARD IN
7 WHEN I SAID A CLOSED ENVIRONMENT I WAS MEANING SOMEONE
8 ATTENDING SUMMIT UNIVERSITY FOR A PERIOD OF APPROXIMATELY SIX
9 WEEKS. YOU KNOW WHAT SUMMIT UNIVERSITY IS?

10 A. YES, I DO.

11 Q. AND YOU KNOW THE ENVIRONMENT AT SUMMIT UNIVERSITY
12 FROM GREGORY MULL'S DESCRIPTION?

13 A. YES.

14 MR. MIDDLETON: I WISH TO REMIND AGAIN THE JURY THAT
15 THIS IS A HYPOTHETICAL QUESTION THAT I POSED.

16 Q NOW, AT THIS STAGE, DO YOU HAVE AN OPINION AS TO
17 THE AFFECT THAT WOULD HAVE ON THE PERSON KNEELING IN FRONT OF
18 THE ONE HOLDING THE SWORD AND/OR STANDING ABOVE THEM?

19 A. MY OPINION IS IS THAT —

20 THE COURT: THIS COULD BE ANSWERED YES OR NO.

21 DO YOU HAVE AN OPINION?

22 THE WITNESS: YES, I DO.

23 Q. BY MR. MIDDLETON: WHAT IS THAT OPINION?

24 A. THAT THAT WOULD INSTILL FEAR, THAT A PERSON DOING
25 THAT WOULD HAVE AUTHORITY AND CONTROL OVER THAT INDIVIDUAL
26 THROUGH FEAR THAT THAT WOULD BE LIKE WHAT HYPNOTISTS CALL A
27 SHOCK INDUCTION.

28 Q. WHAT EXACTLY IS A SHOCK INDUCTION.

1 MR. KLEIN: YOUR HONOR, I WOULD OBJECT, ASK THE ANSWER
2 BE STRICKEN. I THOUGHT THE QUESTION WAS ASKING HER IN HER
3 CAPACITY AS A HYPNOTIST WHETHER IT WOULD HYPNOTIZE SOMEBODY. I
4 THINK THAT HER ANSWER HAS GONE BEYOND HER EXPERTISE WHEN SHE
5 TALKS ABOUT INSTILLING FEAR. IN THAT REGARD, I WOULD ASK THAT
6 THE ANSWER BE STRICKEN.

7 MR. LEVY: MAY I REPLY, YOUR HONOR?

8 THE COURT: I THOUGHT THAT WAS THE QUESTION THAT WAS
9 ASKED. I THINK YOU HAD BETTER GO BACK A COUPLE OF STEPS.

10 MR. MIDDLETON: ALL RIGHT.

11 Q AS A HYP -- AS A PERSON TRAINED IN HYPNOSIS, DO
12 YOU HAVE AN OPINION AS TO WHAT THAT TYPE OF TECHNIQUE WOULD DO
13 ON AN INDIVIDUAL?

14 A. IT WOULD CREATE FEAR.

15 Q. LET'S NOT USE -- WHAT IS THAT TYPE OF TECHNIQUE
16 USED FOR?

17 A. TO PRODUCE HYPNOSIS, A STATE OF HYPNOSIS, A DEEP
18 STATE OF HYPNOSIS.

19 Q. WHEN YOU SAY A DEEP STATE, WHAT DO YOU MEAN BY
20 THAT?

21 A. WELL EVERY TIME -- IF A PERSON IS IN A VERY
22 RELAXED STATE AND THEN SOMEBODY COMES AROUND AND VERY LOUDLY
23 SHOUTS OUT SOMETHING OR BANGS SOMETHING, IT PICKS THEM UP AND
24 DROPS THEM DEEPER, PICKS THEM UP AND DROPS THEM DEEPER, PICKS
25 THEM UP AND DROPS THEM DEEPER.

26 Q THE TERM YOU HAVE FOR THIS IS CALLED WHAT?

27 A. IT'S CALLED A SHOCK INDUCTION.

28 Q. AND NOW ADDING TO THAT YOUR KNOWLEDGE AS A

1 MARRIAGE, FAMILY, CHILD COUNSELOR ALONG WITH YOUR EXPERTISE AS
2 A HYPNOTIST WHAT ELSE WOULD THAT DO TO THE INDIVIDUAL SITTING
3 THERE?

4 MR. KLEIN: YOUR HONOR, I WOULD OBJECT THAT EVEN AS A
5 MARRIAGE, FAMILY, CHILD COUNSELOR SHE WOULD NOT HAVE THE
6 EXPERTISE TO ANSWER THAT. IF YOU WANT TO, I WOULD TAKE HER ON
7 VOIR DIRE ON THAT.

8 MR. LEVY: MAY I RESPOND, YOUR HONOR?

9 THE COURT: ONE OF YOU AT A TIME. ONLY ONE OF YOU.

10 MR. MIDDLETON: I WOULD LIKE TO RESPOND, YOUR HONOR. MY
11 RESPONSE TO THAT --

12 THE COURT: YES, SIR.

13 MR. MIDDLETON: I'M SORRY. I'M A LITTLE BIT TOO ZEALOUS
14 SOMETIMES. MY RESPONSE TO THAT, YOUR HONOR, IS THAT THIS WOMAN
15 IS TRAINED IN HYPNOSIS AND HYPNOTIC TECHNIQUES AND SHE KNOWS
16 WHAT THEY CAN BE USED FOR AND THE RESULTS OF CERTAIN TYPES OF
17 THINGS AS SHOCK THERAPY. I THINK SHE'S WELL QUALIFIED TO
18 ANSWER THIS AFTER SIX YEARS WITH THAT TECHNIQUE.

19 THE COURT: SHE CAN ANSWER.

20 Q. BY MR. MIDDLETON: WOULD YOU ANSWER THE QUESTION,
21 PLEASE.

22 A. WOULD YOU REPEAT THE QUESTION.

23 Q I KNEW YOU WERE GOING TO DO THAT.

24 WITH YOUR HONOR'S PERMISSION, MAY THE COURT
25 REPORTER READ THAT QUESTION BACK.

26 THE COURT: VERY WELL, PLEASE.

27 (QUESTION READ.)

28 THE WITNESS: IT WOULD CONTROL HIM WITH FEAR. THE

1 PERSON WHO IS DOING THAT WOULD BE IN A DOMINANT CONTROLLING
2 POSITION. IT WOULD SHOCK THIS INDIVIDUAL AND IT WOULD BE
3 REGISTERED AND IMPRINTED ON THEIR ENTIRE PSYCHE AND AND ON THE
4 BODY LIKE AN IMPRINT.

5 Q. HAVE YOU FORMED AN OPINION AS TO WHETHER OR NOT
6 GREGORY MULL WAS HYPNOTIZED WHILE AT SUMMIT UNIVERSITY AND/OR
7 CAMELOT?

8 A. YES, I HAVE.

9 Q. WHAT IS THAT OPINION?

10 A THAT HE WAS HYPNOTIZED.

11 Q. AND ON WHAT DO YOU BASE THAT OPINION?

12 A. ON THE FACT THAT HE DECREED TWO TO THREE HOURS
13 EVERY DAY, THAT HE WAS UNDER A GREAT DEAL OF PRESSURE AND
14 STRESS, THAT HE WAS FILLED WITH ANXIETY, WITH FEAR WHILE HE WAS
15 THERE.

16 Q. HAVE YOU FORMED AN OPINION AS TO WHETHER OR NOT
17 ANY SUGGESTIONS WERE PLACED IN MR. MULL'S SUBCONSCIOUS
18 MENTALITY?

19 A. YES, I HAVE.

20 Q. AND WHAT IS THAT OPINION?

21 A. THAT OPINION IS THAT ELIZABETH CLARE PROPHET WAS
22 THE ONLY ONE THAT MATTERED, THE ONLY ONE THAT COULD SAVE HIS
23 SOUL, THE ONLY ONE WHO HAD ALL OF THE ANSWERS, WHO KNEW WHAT
24 WAS RIGHT, WHO KNEW WHAT WAS WRONG, THE ONLY ONE WHO COULD
25 CONTROL THE EVIL FORCES, THE ONLY ONE THAT COULD SHOW YOU THE
26 WAY TO ASCENSION.

27 Q. THESE WERE SUGGESTIONS PLACED IN HIS MENTALITY?

28 A. YES.

1 Q. ANYTHING ELSE YOU CAN THINK OF AT THE MOMENT?

2 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THAT LAST
3 ANSWER AS LACKING FOUNDATION. I DON'T KNOW THE EXPERTISE OF
4 THIS WITNESS AND ASK THAT IT BE STRICKEN.

5 THE COURT: THE MOTION IS DENIED.

6 PROCEED.

7 Q BY MR. MIDDLETON: ANY OTHER SUGGESTIONS THAT
8 MIGHT HAVE BEEN DROPPED INTO HIS MENTALITY?

9 A. THAT HE COULD BY DISOBEYING HER OR DOUBTING HER
10 LOSE HIS SOUL AND NOT WIN SALVATION. HE COULD BE THROWN OUT
11 INTO TO OUTER DARKNESS.

12 Q. HE WAS TRAINED TO OBEY THE GURU?

13 A. THAT'S RIGHT.

14 Q. ARE YOU AWARE OF HOW LONG GREGORY MULL WAS
15 ASSOCIATED WITH THE CHURCH?

16 A. SIX YEARS.

17 Q. HOW OFTEN HE DECREED?

18 A. HE DECREED TWO TO THREE HOURS EVERY DAY, SOMETIMES
19 MORE.

20 Q. HOW LONG HE ATTENDED SUMMIT UNIVERSITY?

21 A. THERE WERE TWO SESSIONS THAT HE WENT TO SUMMIT
22 UNIVERSITY, THREE MONTHS EACH TIME.

23 Q. AND HOW LONG HE RESIDED AT CAMELOT?

24 A. 17 MONTHS.

25 Q. NOW, CONSIDERING THE LENGTH OF TIME THAT HE WAS
26 INVOLVED WITH THE CHURCH, THE TWO SESSIONS AT SUMMIT
27 UNIVERSITY, AND THE LENGTH OF TIME HE RESIDED AT CAMELOT, AND
28 THE AMOUNT OF SUGGESTION THAT WAS GIVEN TO HIM BY ELIZABETH

1 CLARE PROPHET, DO YOU HAVE AN OPINION AS TO WHETHER GREGORY
2 MULL COULD HAVE RESISTED THE DEMANDS PLACED UPON HIM BY
3 ELIZABETH CLARE PROPHET?

4 A. YES, I DO HAVE AN OPINION.

5 Q. AND WHAT IS THAT OPINION?

6 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS THAT ANSWER TO
7 THAT QUESTION BEING BEYOND THE EXPERTISE OF THIS WITNESS AND
8 THE FOUNDATION HAS NOT BEEN LAID.

9 THE COURT: OBJECTIONS OVERRULED.

10 Q BY MR. MIDDLETON: YOU MAY ANSWER.

11 A. OKAY. MY OPINION IS THAT GREGORY MULL COULD NOT
12 RESIST ANYTHING FROM HER AT ALL, THAT ANYTHING ELIZABETH CLARE
13 PROPHET WOULD WANT OR WOULD ASK FOR OR WOULD SAY OR WOULD STATE
14 HE WOULD GIVE HER, HE WOULD BELIEVE BECAUSE THAT WAS ALL THAT
15 WAS IN HIS MIND WAS ELIZABETH CLARE PROPHET.

16 Q. HOW IS IT THAT HE WAS ABLE TO RESIST ED FRANCIS OR
17 MONROE SHEARER WHEN THEY ASKED HIM TO PLEDGE HIS MONEY?

18 A. IT WAS NOT ELIZABETH ASKING HIM.

19 Q. I'M GOING TO BACKTRACK JUST FOR A MOMENT. YOU'RE
20 MARRIED TO MR. LEVY?

21 A. YES, I AM.

22 Q. HOW LONG HAVE YOU BEEN SO MARRIED?

23 A. 14 YEARS.

24 Q. YOU HAVE MY CONDOLENCES.

25 MR. LEVY: SEE WHAT I HAVE TO PUT UP WITH.

26 Q. BY MR. MIDDLETON: OVER THE PERIOD OF TIME THAT
27 YOU WORKED WITH GREGORY MULL AND THE SESSIONS THAT YOU HAD WITH
28 HIM, DID THE SESSIONS VARY ANY?

1 A. IN THE BEGINNING, NO. IN THE BEGINNING THEY WERE
2 FILLED WITH HIS FEAR FOR THE SALVATION OF HIS SOUL, THEY WERE
3 FILLED WITH THE FEAR OF THE HARASSMENT THAT WAS GOING ON. HE
4 WAS AFRAID THAT HE WOULD BE KILLED. HE WAS TERRIFIED FOR HIS
5 DAUGHTER AND HE WAS CONSTANTLY TRYING TO RECONCILE IN HIS MIND
6 WHAT ELIZABETH CLARE PROPHET HAD TAUGHT HIM SPIRITUALLY, WHAT
7 WAS CORRECT AND TRUE AND HER BEHAVIOR. THE REASON HE WAS
8 TRYING TO RECONCILE THIS IN HIS OWN MIND IS THAT IF HE COULD
9 PROVE TO HIMSELF --

10 MR. KLEIN: YOUR HONOR, THE WITNESS HAS GONE BEYOND THE
11 QUESTION.

12 THE COURT: I THINK IT'S TIME FOR ANOTHER QUESTION.

13 MR. KLEIN: ALSO I WOULD ASK WITH RESPECT TO THE HEARSAY
14 WHEN SHE TALKED ABOUT BEING KILLED AND IN FEAR OF HIS DAUGHTER
15 THAT YOUR HONOR GIVE AN INSTRUCTION LIMITING THE USE OF THAT
16 HEARSAY.

17 THE COURT: ONCE AGAIN, LADIES AND GENTLEMEN, YOU MAY
18 CONSIDER THIS WITNESS' RECOUNTING OF STATEMENTS MADE BY
19 MR. MULL TO HER NOT AS EVIDENCE OF THE TRUTH OF THE STATEMENTS
20 THEMSELVES BUT AS EVIDENCE OF THE FACT THAT THE STATEMENTS WERE
21 UTTERED BY MR. MULL, WERE MADE TO HER AND FURTHER AS A BASIS
22 FOR THIS WITNESS DOING OR NOT DOING CERTAIN THINGS AND ALSO AS
23 A BASIS FOR HER CONCLUSIONS.

24 MR. KLEIN: THANK YOU.

25 THE COURT: YOU'RE WELCOME.

26 Q. BY MR. MIDDLETON: WHAT WERE THE CONFLICTS THAT
27 MR. MULL WAS TRYING TO WORK OUT WITHIN HIMSELF?

28 A. WHAT HE WAS TRYING TO RESOLVE?

1 Q. YES.

2 A. OKAY. HE WAS TRYING TO RECONCILE IN HIS MIND THE
3 CONFLICTS THAT ELIZABETH COULD HOLD HIS SOUL AND CONDEMN IT TO
4 HELL. HE HAD TO FIND OUT WHETHER SHE WAS DEVINE OR WHETHER SHE
5 WAS HUMAN. SO HE LOOKED INTO REMEMBERING ALL OF THE THINGS
6 THAT THEY HAD EXPERIENCED TOGETHER AND ALL OF THE THINGS THAT
7 HE KNEW AND HE FOUND — AND HE TALKED TO OTHER EX-CHURCH
8 MEMBERS AND COMPARED NOTES WITH THEM AND A LOT OF THE THINGS
9 THAT HE FOUND OUT WAS THAT SHE WOULD PREACH AND TEACH A CERTAIN
10 CODE OF BEHAVIOR LIKE SEXUAL BEHAVIOR AND THAT HER SEXUAL —
11 HER OWN PERSONAL SEXUAL BEHAVIOR DID NOT STAND UP TO WHAT SHE
12 PREACHED, THAT HE TOLD ME THAT SHE HAD THREE OR FOUR MEN ON HER
13 STAFF, VERY YOUNG MEN, THAT WOULD COME IN EVERY DAY AND
14 MASTURBATE HER TO ORGASM BECAUSE THE MASTERS TOLD THAT —

15 Q. THIS WAS GREGORY'S STATEMENT TO YOU?

16 A. RIGHT.

17 Q. YOU DON'T KNOW THE TRUTH OR THE FALSITY OF THAT,
18 DO YOU?

19 A. NO.

20 Q. THIS WAS SOMETHING THAT HE WAS TRYING TO RECONCILE
21 IN HIS MIND?

22 A. THAT IS RIGHT.

23 Q. IS THERE ANY OTHER AREA HE WAS TRYING TO
24 RECONCILE?

25 A. IT'S LIKE WITH — WHEN IT CAME TO FOOD AND THINGS
26 LIKE THAT SHE HAD ONE CODE OF BEHAVIOR FOR THEM AND ONE WAY
27 THEY WERE SUPPOSED TO EAT AND SHE ATE A DIFFERENT WAY.

28 Q. AGAIN THIS IS ACCORDING TO HIM?

1 A. THAT'S RIGHT.

2 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AT THIS POINT,
3 THE RELEVANCY OF THESE STATEMENTS.

4 THE COURT: OVERRULED.

5 ONCE YOU FIND A CONVENIENT TIME IN THE NEXT FEW
6 MOMENTS, WE WILL STOP FOR THE DAY.

7 MR. LEVY: EXCUSE ME, YOUR HONOR. MAY I REMARK ABOUT
8 THAT. THIS WITNESS WAS HERE YESTERDAY AND TIME CONSTRAINTS DID
9 NOT ALLOW IT. SHE HAS BEEN HERE ALL DAY TODAY. SHE DOES HAVE
10 A PROFESSIONAL SCHEDULE. I KNOW IT'S FOUR O'CLOCK. I HATE TO
11 IMPOSE ON THE COURT, BUT WE DID LET YOU GO TO LUNCH EARLY.

12 THE COURT: WE'RE GOING STOP IN A FEW MOMENTS.

13 MR. LEVY: YES, YOUR HONOR.

14 THE COURT: WE'RE NOT GOING TO FINISH WITH HER TODAY
15 ANYWAY, AS A PRACTICAL MATTER.

16 MR. LEVY: EXCUSE A LITTLE PATERNALISM ON MY PART, YOUR
17 HONOR.

18 THE COURT: AS A PRACTICAL MATTER, WE'RE NOT GOING TO
19 FINISH WITH HER TODAY EVEN IF WE STAYED FOR SEVERAL MORE HOURS,
20 I WOULD ASSUME, WHICH WE'RE NOT GOING TO DO.

21 MR. MIDDLETON: YOUR HONOR, IT WOULD BE A CONVENIENT
22 TIME NOW, IF YOU SO WISH.

23 THE COURT: WE WILL RESUME TOMORROW MORNING AT 9:15.

24 HAVE A VERY PLEASANT EVENING. REMEMBER THE
25 COURT'S ADMONITION.

26 (AT 4:02 P.M. AN ADJOURNMENT WAS TAKEN.)

27

28