

COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT

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

SUPERIOR COURT  
NO. C 358191

APPEAL FROM THE SUPERIOR COURT OF LOS ANGELES COUNTY

HONORABLE ALFRED L. MARGOLIS, JUDGE PRESIDING

REPORTERS' TRANSCRIPT ON APPEAL

APPEARANCES:

FOR THE PLAINTIFF,  
CROSS-DEFENDANTS AND  
APPELLANTS:

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

FOR THE DEFENDANT,  
CROSS-COMPLAINANT AND  
RESPONDENT:

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

-AND-

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

COPY

VOLUME 6 OF 12 VOLUMES  
PAGES 1220 TO 1362, INCL.

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

1           LOS ANGELES, CALIFORNIA; WEDNESDAY, FEBRUARY 26, 1986  
2                                           9:30 A.M.  
3       DEPARTMENT NO. 50                   HON. ALFRED L. MARGOLIS, JUDGE  
4                                           (APEARANCES AS NOTED ON TITLE PAGE.)  
5

6                           THE COURT: GOOD MORNING, EVERYBODY.  
7

8                                           KATHLEEN LEVY,  
9       RESUMED THE STAND AND TESTIFIED FURTHER AS FOLLOWS:

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

13                   THE WITNESS: KATHLEEN LEVY.

14                   THE CLERK: THANK YOU.

15                   THE COURT: PLEASE PROCEED.

16                   MR. MIDDLETON: THANK YOU, YOUR HONOR.  
17

18                                           DIRECT EXAMINATION (RESUMED)

19       BY MR. MIDDLETON:

20                   Q       MRS. LEVY, YESTERDAY WE LEFT OFF AND WE WERE  
21       DISCUSSING HYPNOSIS. NOW, I'D LIKE TO GO BACK TO THAT TOPIC  
22       AT THE MOMENT JUST FOR A BIT.

23                                           WHAT ARE SOME OF THE METHODS OR TECHNIQUES OF  
24       INDUCING HYPNOSIS?

25                   A       THERE IS PROGRESSIVE RELAXATION, EYE  
26       FASCINATION, IMAGERY, THE HYPNOTIC DISK AND SHOCK INDUCTION.

27                   Q       WHAT IS A PERSON LIKE WHEN THEY ARE UNDER  
28       HYPNOSIS? WE ALL HAVE OUR OWN VIEWPOINT. YOU ARE AN

1 EXPERT. I'D LIKE YOU TO EXPLAIN TO US WHAT HYPNOSIS IS ALL  
2 ABOUT.

3 WHAT DO THEY LOOK LIKE, WHAT IS GOING ON?

4 A THEY ARE EXTREMELY RELAXED, VISIBLY RELAXED AND  
5 HIGHLY SUSCEPTIBLE TO SUGGESTION AT THAT TIME.

6 Q ARE THEY ALERT, ALIVE, AWAKE --

7 A YES. THEY ARE CONSCIOUS, THEY CAN HEAR  
8 EVERYTHING THAT YOU ARE SAYING. THEIR CONCENTRATION IS MORE  
9 POINTED, MORE ACUTE. THEY HEAR BETTER, THEY COULD SEE  
10 BETTER, THEY COULD SMELL BETTER, THEY CAN TALK BETTER AT  
11 THAT TIME. THEY ARE COMPLETELY AWARE OF EVERYTHING YOU ARE  
12 SAYING.

13 Q WHAT ALLOWS THE HYPNOTIC PROCESS TO TAKE PLACE  
14 IF THEY ARE COMPLETELY AWARE, ALERT AND CAN HEAR EVERYTHING?

15 A WHAT ALLOWS THE HYPNOTIC PROCESS TO TAKE PLACE?  
16 WHAT ALLOWS IT TO TAKE PLACE IS THAT IT IS A NATURAL STATE  
17 OF BEING. IT IS A STATE OF BEING THAT EVERYBODY GOES INTO.

18 IT IS WHAT HAPPENS WHEN A PERSON BECOMES  
19 RELAXED OR IT IS WHAT HAPPENS WHEN THEY ARE -- GET A LOT OF  
20 MESSAGE UNITS THAT GOES INTO THEIR CONSCIOUS MIND. AND WHEN  
21 THE CRITICAL AREA OF MIND IS PASSED, IT IS JUST -- IT IS THE  
22 WAY IT IS.

23 Q IT IS WHEN THE CRITICAL AREA OF MIND IS PASSED?

24 A AND IT GOES INTO THE SUBCONSCIOUS MIND. THE  
25 SUBCONSCIOUS MIND IS VERY LITERAL AND IT TAKES EVERYTHING IN  
26 VERY FREELY AT THAT POINT IN TIME.

27 Q ARE YOU SAYING IT IS RECEPTIVE AT THAT POINT?

28 A HIGHLY RECEPTIVE.

1 Q NOW, WHAT IS SHOCK INDUCTION?

2 A SHOCK INDUCTION IS WHEN A PERSON IS RECEPTIVE  
3 TO THE HYPNOTIC STATE EITHER BECAUSE OF EXTREME STRESS,  
4 EXTREME RELAXATION, MANY, MANY MESSAGE UNITS AND SOMEBODY  
5 COMES UP AND SHOCKS THEM INTO THE STATE OF HYPNOSIS.

6 Q WHAT IS IT USED FOR?

7 A IT IS USED TO MAINTAIN CONTROL, TO GET CONTROL  
8 AND MAINTAIN CONTROL.

9 Q AND IT IS -- WHAT IT IS USED FOR IS TO GAIN  
10 CONTROL?

11 A UH-HUH.

12 Q AND DO YOU USE THAT IN YOUR PRACTICE?

13 A NO, I DON'T.

14 Q IS THERE A REASON WHY NOT?

15 A I WOULD NEVER HAVE ANY REASON TO -- TO MAINTAIN  
16 OR GET THAT KIND OF CONTROL OVER SOMEONE. THE ONLY TIME I  
17 COULD IMAGINE MYSELF USING IT IS IF SOMEONE WAS IN -- WAS  
18 INJURED, WAS BLEEDING TO DEATH, SOMETHING LIKE THAT, TO GET  
19 CONTROL OVER THEM COMPLETELY IMMEDIATELY SO THAT I'D HAVE  
20 FULL POWER OVER THEIR MIND AND THEIR BODY.

21 Q SO IN AN EXTREME SITUATION, YOU MIGHT USE IT?

22 A THAT'S RIGHT.

23 Q ALL RIGHT.

24 A THAT'S RIGHT.

25 Q OKAY. LET'S GO ON NOW AND WE WERE TALKING AT  
26 ONE POINT ABOUT SESSIONS THAT YOU HAD WITH GREGORY MULL  
27 DURING THE PERIOD OF 1981 TO 1983. AND I HAD ASKED YOU  
28 WHETHER THERE WAS ANY -- WHETHER THOSE SESSIONS REMAINED THE

1 SAME THROUGHOUT THE ENTIRE PERIOD OR WHETHER THERE WAS SOME  
2 CHANGE IN THOSE SESSIONS.

3 DO YOU RECALL THAT?

4 A YES.

5 Q DID THE SESSIONS REMAIN THE SAME OR WAS THERE  
6 SOME CHANGE?

7 A FOR THE MOST PART, THEY REMAINED THE SAME.  
8 TOWARD THE END OF THAT TWO-YEAR PERIOD, A CHANGE BEGAN TO  
9 OCCUR.

10 Q WOULD YOU DESCRIBE WHAT THE CHANGE WAS?

11 A THE CHANGE SEEMED TO BE GREGORY MULL SEEMED TO  
12 BE COMING INTO MORE CONTROL, HE WAS BECOMING A LITTLE MORE  
13 STABILIZED, HE SEEMED A LITTLE MORE RELAXED AND HE WAS  
14 BEGINNING TO SLEEP AGAIN.

15 Q AND THIS WAS TOWARD THE END OF '83?

16 A YES.

17 Q ALL RIGHT. FROM YOUR OBSERVATIONS OF HIM AND  
18 YOUR WORKING WITH HIM, WHAT WAS HE LIKE DURING THIS TWO-YEAR  
19 PERIOD IN TERMS OF HIS EVERYDAY ABILITY TO COPE WITH HIS  
20 SURROUNDING ENVIRONMENT?

21 A HE COULDN'T COPE AT ALL. HE WAS JUST TOTALLY  
22 FIXATED ON THE FEAR -- ON ALL OF THE FEARS THAT HE HAD. IT  
23 WAS VERY DIFFICULT FOR HIM TO MAKE DECISIONS, FOR HIM TO  
24 EVEN TAKE CARE OF HIMSELF. HE WAS JUST REALLY TOTALLY  
25 FOCUSED ON TRYING TO SAVE HIS SOUL, TRYING TO GET HIS SOUL  
26 BACK, TRIED TO PROTECT HIMSELF AND HIS DAUGHTER.

27 Q ALL RIGHT. AND THEN FOR THE LATTER PART OF  
28 '83, THIS CONDITION IMPROVED AND HE SEEMED TO START TO COPE

1 BETTER?

2 A THAT'S RIGHT.

3 Q DID YOU CONTINUE TO SEE HIM?

4 A NO. THERE WAS ABOUT A SIX- OR SEVEN-MONTH  
5 PERIOD OF TIME WHEN GREGORY DIDN'T COME IN TO SEE ME. IT  
6 WAS FROM SEPTEMBER OR OCTOBER OF '83 UNTIL APRIL OF '84.

7 Q WHEN HE CAME IN TO SEE YOU AGAIN IN APRIL OF  
8 '84 --

9 A THAT'S RIGHT.

10 Q -- WAS THERE A REASON HE CAME TO SEE YOU IN  
11 APRIL OF '84?

12 A HE CALLED UP AND HE WAS IN A PANIC. I SAID,  
13 "GREGORY, COME ON OVER RIGHT AWAY."

14 HE CAME IN. HE SAID, "I AM REALLY TERRIFIED.  
15 I AM FRIGHTENED TO DEATH."

16 I SAID, "WHAT'S THE MATTER, GREGORY?"

17 HE SAID, "ELIZABETH HAS IDENTIFIED ME TO HER  
18 MEMBERSHIP AS THE BEAST OF BLASPHEMY." HE SAID --

19 Q DID HE TELL YOU WHAT THAT MEANT TO HIM AT THAT  
20 POINT IN TIME?

21 A YES, HE DID.

22 Q WHAT DID IT MEAN TO GREGORY AS FAR AS HOW HE  
23 RELATED IT TO YOU AS YOU WERE ABLE TO UNDERSTAND IT?

24 A HE TOOK IT LITERALLY AND FREELY HE WAS THE  
25 BEAST OF BLASPHEMY, HE WAS THE SERPENT. HE WAS SO TERRIFIED  
26 NOW BECAUSE HE HAD BEEN SCHOOLED AND TRAINED TO BELIEVE THAT  
27 THE BEAST OF BLASPHEMY WAS TO BE SOUGHT OUT AND TO BE  
28 KILLED. HE WAS TERRIFIED AND HE FELT THAT HE HIMSELF WAS

1 THE BEAST OF BLASPHEMY AND IT SEEMED TO ME TO START A  
2 DESTRUCTIVE PROCESS OF DISINTEGRATING.

3 Q WAS HE VISIBLY --

4 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THE LAST  
5 ANSWER IN THAT IN '83, THIS WITNESS WAS STILL A HYPNOTIST  
6 AND I DON'T BELIEVE THERE HAS BEEN A FOUNDATION LAID THAT  
7 SHE COULD MAKE THE CONCLUSIONS THAT SHE JUST TESTIFIED TO.  
8 I WOULD ASK THAT IT BE STRICKEN.

9 MR. MIDDLETON: SHE WAS PRACTICING AS A LAY THERAPIST  
10 UNDER THE BUSINESS AND PROFESSIONS CODE, YOUR HONOR, AND  
11 UNDER A TRAINED PSYCHOLOGIST.

12 THE COURT: OBJECTION IS OVERRULED.

13 Q BY MR. MIDDLETON: WAS HE VISIBLY UPSET?

14 A EXTREMELY. YOU COULD SEE IT. THERE -- GREGORY  
15 AT THAT TIME -- YOU COULDN'T EVEN TALK TO HIM, YOU COULDN'T  
16 GET THROUGH TO HIM.

17 Q WHAT DID YOU DO FOR HIM?

18 A I TRIED TO RELAX HIM, I TRIED TO USE  
19 VISUALIZATION AT THAT TIME, AND TO CALM HIM DOWN AND TO  
20 EXPLAIN TO HIM THAT HE WASN'T THE BEAST OF BLASPHEMY. BUT  
21 HE JUST -- IT WAS JUST OVERPOWERING HIM COMPLETELY.

22 Q AND HOW MANY -- DID YOU SEE HIM MORE THAN THAT  
23 ONE OCCASION THEN?

24 A I SAW HIM TWO, MAYBE THREE TIMES. AND EACH  
25 TIME, THE CONDITION STILL SEEMED TO BE THE SAME AND --

26 Q OVER WHAT PERIOD OF TIME WAS THAT THAT YOU SAW  
27 HIM TWO OR THREE TIMES?

28 A THAT WAS A TWO-WEEK PERIOD.

1 Q THAT WAS A TWO-WEEK PERIOD?

2 A THAT'S RIGHT. AND THEN IN THAT TWO-WEEK PERIOD  
3 OF TIME, FINALLY HE SAID THAT HE WAS SO NERVOUS STAYING  
4 AROUND HOME AND THAT ENVIRONMENT THAT HE WAS GOING TO GO UP  
5 NORTH AND REST AND TAKE A VACATION AND GET AWAY FROM  
6 EVERYTHING BECAUSE HE WAS REALLY JUST VERY FRIGHTENED. HE  
7 DIDN'T WANT TO STAY THERE ANY MORE. SO THE NEXT TIME --

8 Q DID YOU RECOMMEND ANYTHING TO HIM AT THAT  
9 POINT?

10 A I JUST -- I TOLD HIM, "GO AHEAD, GREGORY. AND  
11 WHEN YOU GET BACK, COME BACK AND SEE ME AND WE WILL WORK ON  
12 THIS, YOU KNOW. IN THE MEANTIME, TRY TO CALM DOWN, TRY TO  
13 REALIZE, YOU KNOW, WHAT IS HAPPENING HERE. THAT YOU ARE NOT  
14 THE BEAST OF BLASPHEMY, NO ONE HAS CONTROL OVER YOUR SOUL,  
15 NO ONE CAN CONDEMN YOU TO HELL, YOU KNOW. YOU ARE GOING TO  
16 SURVIVE."

17 Q AND EVEN THOUGH YOU SAID THAT TO HIM, HE HAD  
18 DIFFICULTY ACCEPTING THAT?

19 A IT WAS CONSCIOUSLY HE ACCEPTED IT,  
20 UNCONSCIOUSLY IT WENT IN LITERALLY AND FREELY AND IT WAS --  
21 HE WAS RESPONDING TO THE UNCONSCIOUS AT THAT POINT IN TIME.  
22 IT SEEMED TO HAVE COMPLETE CONTROL.

23 SO AFTER THAT POINT IN TIME, THE NEXT TIME I  
24 SAW GREGORY WAS -- NEXT TIME I HEARD ABOUT HIM IS WHEN HE  
25 WAS IN THE HOSPITAL, WHICH WAS ABOUT SIX WEEKS, TWO MONTHS  
26 LATER, SOMETHING LIKE THAT.

27 Q SO SOMETIME IN THE SUMMER OF --

28 A IN JUNE, YEAH.



1 Q SOMETIME IN THE SUMMER OF '84, I TAKE IT, HE  
2 THEN WAS IN THE HOSPITAL. HAVE YOU HAD AN OCCASION TO WORK  
3 WITH HIM SINCE THEN?

4 A YES, I HAVE.

5 Q AND HOW RECENTLY HAVE YOU WORKED WITH HIM?

6 A JUST BEFORE HE STARTED THIS TRIAL.

7 Q AND HOW DOES HE APPEAR AT PRESENT TO YOU?

8 A HE DOESN'T APPEAR TO ME TO BE CAPABLE OF  
9 DEALING WITH THE DEMANDS OF HIS ENVIRONMENT, OF EMOTIONALLY  
10 OR PSYCHOLOGICALLY COPYING OR PHYSICALLY COPYING.

11 MR. KLEIN: I WOULD OBJECT TO THE LAST ANSWER AS LACK  
12 OF FOUNDATION BEING LAID FOR THIS WITNESS' EXPERTISE TO SAY  
13 THAT.

14 MR. MIDDLETON: YOUR HONOR, BY THIS TIME SHE HAS A  
15 MARRIAGE FAMILY COUNSELOR'S LICENSE.

16 MR. KLEIN: I AM AWARE OF THAT. I WOULD STILL MAKE  
17 THAT OBJECTION, YOUR HONOR.

18 THE COURT: OBJECTION IS OVERRULED.

19 Q BY MR. MIDDLETON: ONE OTHER POINT THAT WE  
20 DIDN'T QUITE COVER. DO YOU HAVE SOME SORT OF CREDENTIAL OR  
21 DEGREE FROM THE STATE OF CALIFORNIA WITH REGARD TO HYPNOSIS?

22 A YES, I DO.

23 Q AND WHAT IS THAT?

24 A I AM CERTIFIED BY THE BOARD OF BEHAVIORAL  
25 SCIENCES TO PRACTICE HYPNOSIS.

26 Q IN YOUR COUNSELING?

27 A UH-HUH.

28 Q THANK YOU. NOW, GOING BACK TO GREGORY MULL,

1 HAVE YOU MADE A DIAGNOSIS OF HIM AT THIS TIME?

2 A YES, I HAVE.

3 Q ALL RIGHT. AND WHAT IS THAT DIAGNOSIS?

4 A SEVERE --

5 MR. KLEIN: YOUR HONOR, AGAIN I WOULD OBJECT TO THE  
6 LACK OF FOUNDATION OF THIS WITNESS' EXPERTISE EVEN AS A  
7 M.F.C.C. TO MAKE A DIAGNOSIS IN THIS CASE.

8 THE COURT: SHE CAN CERTAINLY DO IT IN HER FIELD.  
9 OVERRULED.

10 Q BY MR. MIDDLETON: WHAT IS THAT DIAGNOSIS?

11 A SEVERE PSYCHIC TRAUMA.

12 Q COULD YOU EXPLAIN WHAT SEVERE PSYCHIC TRAUMA  
13 IS?

14 A IT IS A PERSISTENT CONDITION OF PANIC, FEAR,  
15 ANXIETY AND INSECURITY THAT MAKES IT IMPOSSIBLE FOR ITS  
16 VICTIM TO DEAL WITH THE NORMAL DEMANDS OF HIS ENVIRONMENT.

17 Q ON WHAT DO YOU BASE THIS CONCLUSION?

18 A IN REGARDS TO GREGORY MULL?

19 Q IN REGARDS TO GREGORY MULL.

20 A I BASE THE CONCLUSION ON EVERYTHING THAT HE  
21 TOLD ME, AND ON EVERYTHING THAT I WITNESSED AND ON MY  
22 TRAINING.

23 Q HAVE YOU FORMED AN OPINION AS TO WHETHER OR NOT  
24 GREGORY MULL'S CONDITION HAS BECOME A PERMANENT CONDITION?

25 A YES, I HAVE.

26 Q WHAT IS THAT OPINION?

27 A I BELIEVE THAT GREGORY MULL WILL NEVER BE ABLE  
28 TO FUNCTION LIKE HE WAS IN THE PAST BEFORE HE GOT INVOLVED

1 WITH C.U.T.

2 MR. MIDDLETON: THANK YOU. THERE IS NO FURTHER  
3 QUESTIONS, YOUR HONOR.

4 THE COURT: VERY WELL. YOU MAY PROCEED.

5 MR. KLEIN: MAY I HAVE JUST ONE MOMENT, YOUR HONOR?

6 THE COURT: DO YOU HAVE ANY QUESTIONS?

7 MR. KLEIN: YES, I DO, YOUR HONOR.

8 MR. LEVY: EXCUSE ME, MR. KLEIN, BEFORE YOU START.

9

10 CROSS-EXAMINATION

11 BY MR. KLEIN:

12 Q GOOD MORNING, MRS. LEVY.

13 A GOOD MORNING.

14 Q AS A HYPNOTIST -- AM I CORRECT YOU SAW MR. MULL  
15 FROM 1981 TO JANUARY, 1984, IN YOUR CAPACITY AS A HYPNOTIST?

16 A TO SEPTEMBER OR OCTOBER OF '83 AS A HYPNOTIST.

17 Q THEN IN -- AND DURING THOSE YEARS WHEN YOU SAW  
18 HIM AS A HYPNOTIST, YOU TOOK NO NOTES; IS THAT RIGHT?

19 A THAT'S RIGHT.

20 Q THEN BEGINNING IN JANUARY, 1984, THE TIMES YOU  
21 SAW HIM AFTER THAT, YOU WERE SEEING HIM IN YOUR CAPACITY AS  
22 A MARRIAGE FAMILY CHILD COUNSELOR; IS THAT RIGHT?

23 A THAT'S RIGHT.

24 Q NOW, IS IT CUSTOMARY IN THIS COMMUNITY FOR A  
25 MARRIAGE FAMILY CHILD COUNSELOR TO TAKE NOTES WHEN THEY HAVE  
26 COUNSELING SESSIONS WITH A PATIENT?

27 A NOT NECESSARILY.

28 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT

1 CALLS FOR A CONCLUSION AS TO WHAT OTHER PEOPLE IN THE  
2 COMMUNITY MAY OR MAY NOT DO.

3 THE COURT: SUSTAINED. PLEASE REPHRASE YOUR  
4 QUESTION.

5 Q BY MR. KLEIN: ARE YOU FAMILIAR WITH THE  
6 COMMUNITY STANDARDS WITH RESPECT TO MARRIAGE AND FAMILY  
7 CHILD COUNSELORS?

8 A YES, I AM.

9 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT  
10 ASSUMES THERE ARE COMMUNITY STANDARDS. THERE IS NO  
11 FOUNDATION FOR THE QUESTION.

12 THE COURT: SUSTAINED.

13 Q BY MR. KLEIN: ARE THERE COMMUNITY STANDARDS BY  
14 WHICH MARRIAGE AND FAMILY CHILD COUNSELORS IN THEIR  
15 COMMUNITY CONDUCT THEIR PRACTICES?

16 A IN REGARDS TO --

17 Q WELL, FIRST OF ALL, ARE THERE STANDARDS AT ALL?

18 A YES.

19 THE COURT: AS TO WHAT?

20 Q BY MR. KLEIN: NOW, ARE THERE STANDARDS WITH  
21 RESPECT TO WHETHER YOU TAKE NOTES WHEN YOU INTERVIEW  
22 PATIENTS IN COUNSELING SESSIONS?

23 A YOU MEAN WHETHER WE SHOULD OR SHOULDN'T?

24 Q YES.

25 A WHAT I WAS TAUGHT WAS THAT IT WAS LEFT UP TO US  
26 WHAT WE FELT COMFORTABLE WITH.

27 Q AND DURING THE COURSE OF YOUR PRACTICE, DO YOU  
28 TAKE NOTES WHEN YOU HAVE COUNSELING SESSIONS WITH PATIENTS?

1           A        I USED TO IN THE BEGINNING. BUT THEN I STOPPED  
2 BECAUSE IT MADE MY CLIENTS UNCOMFORTABLE. THEY'D WANT TO  
3 KNOW WHAT I WAS JOTTING DOWN AND IT WOULD SOMETIMES BE  
4 DISTRACTING. SO I STOPPED DOING IT. AND THEN OCCASIONALLY  
5 AFTER THEY WERE GONE IF I WANTED TO WORK SOMETHING OUT, I  
6 MAY WORK IT OUT BY MYSELF AND THEN THROW THE NOTES AWAY.

7           Q        NOW, WITH RESPECT TO MR. MULL, WHEN YOU SAW HIM  
8 IN THE BEGINNING OF JANUARY, 1984, AS A MARRIAGE FAMILY  
9 CHILD COUNSELOR, DID YOU KNOW THAT YOU WERE GOING TO BE AN  
10 EXPERT WITNESS IN THIS TRIAL?

11          A        NO.

12          Q        DID YOU SUSPECT THAT YOU WOULD BE AN EXPERT  
13 WITNESS IN THIS TRIAL?

14          A        NO.

15          Q        DID YOU TAKE ANY NOTES WHEN YOU WERE A MARRIAGE  
16 FAMILY CHILD COUNSELOR OF ANY OF THE COUNSELING SESSIONS YOU  
17 HAD WITH MR. MULL?

18          A        NO.

19          Q        TO THE EXTENT THEN THAT YOU'VE TOLD US WHAT YOU  
20 SAID, WHAT YOU ARE DOING THEN IS GIVING US YOUR MEMORY, YOUR  
21 RECOLLECTION OF WHAT HAPPENED IN THE BEGINNING OF 1984 THAT  
22 IS UNAIDED BY ANY NOTES OR ANYTHING?

23          A        THAT'S RIGHT.

24          Q        NOW, WITH REGARD TO THAT, YOU TOLD US THAT  
25 SOMEWHERE AROUND APRIL OF '84, MR. MULL CALLED YOU UP AND HE  
26 WAS FRIGHTENED TO DEATH BECAUSE ELIZABETH HAD IDENTIFIED HIM  
27 AS THE BEAST OF BLASPHEMY?

28          A        THAT'S RIGHT.

1 Q AND WAS THIS SOMETHING DIFFERENT FROM WHAT HE  
2 HAD BEEN TELLING YOU UP TO THAT DATE AS FAR AS WHAT HIS  
3 FEARS WERE ABOUT?

4 A YOUR QUESTION IS NOT CLEAR TO ME.

5 Q OKAY. PRIOR TO THAT DATE, HAD HE EVER TOLD YOU  
6 THAT ELIZABETH HAD IDENTIFIED HIM AS THE BEAST OF BLASPHEMY?

7 A NO, I DON'T BELIEVE SO.

8 Q AND WAS IT YOUR FEELING THAT HIS ANXIETY, HIS  
9 FEAR HAD GREATLY INCREASED AS A RESULT OF HER CALLING HIM  
10 THAT?

11 A THE BEAST OF BLASPHEMY AND THE SERPENT?

12 Q YES.

13 A YES, IT WAS.

14 Q DO YOU RECALL MY TAKING YOUR DEPOSITION IN THE  
15 BEGINNING OF 1985?

16 A YES, I DO.

17 MR. KLEIN: I AM GOING TO READ FROM PAGE 50, LINE 11  
18 THROUGH LINE 28.

19 THE COURT: GO AHEAD.

20 Q BY MR. KLEIN: TELL ME IF YOU RECALL BEING  
21 ASKED THESE QUESTIONS AND GIVING THESE ANSWERS.

22 "Q FROM JANUARY OF 1984 UNTIL THE  
23 PRESENT DATE," AND THE PRESENT DATE WAS MARCH 21ST,  
24 1985, "FROM JANUARY OF 1984 UNTIL THE PRESENT DATE,  
25 AS AN M.F.C.C., CAN YOU GIVE ME ANY KIND OF  
26 APPROXIMATION AS TO HOW MANY TIMES YOU'VE  
27 SEEN HIM, 'HIM' BEING GREGORY MULL?

28 "A IN THE BEGINNING OF JANUARY,

1                   1984, I PROBABLY SAW GREGORY AROUND A HALF  
2                   A DOZEN TIMES UNTIL HIS STROKE IN JUNE, AND  
3                   FROM JUNE UNTIL THREE OR FOUR WEEKS AGO, I  
4                   HAVEN'T SEEN HIM.

5                   "Q     WITH RESPECT TO THE FIRST SIX  
6                   TIMES OR SO THAT YOU SAW HIM BETWEEN  
7                   JANUARY OF '84 AND THE TIME HE HAD THE  
8                   STROKE, DID HE TELL YOU ANYTHING ABOUT THE  
9                   CHURCH OR ABOUT ITS MEMBERS DIFFERENT FROM  
10                  WHAT YOU'VE ALREADY TOLD US?

11                  "A     NO, NO.

12                  "Q     DID HE SAY ANYTHING AT THOSE  
13                  SESSIONS ABOUT STRESS THAT WAS ANY DIFFERENT  
14                  FROM WHAT YOU'VE ALREADY TOLD US?

15                  "A     NO."

16                  DO YOU REMEMBER BEING ASKED THOSE QUESTIONS AND  
17                  GIVING THOSE ANSWERS?

18                  A     YES, I DO.

19                  Q     WAS THERE A PARTICULAR REASON WHEN I ASKED YOU  
20                  THE QUESTION ABOUT THE TIMES YOU SAW HIM FROM JANUARY, '84,  
21                  UNTIL THE STROKE IN JUNE WHETHER HE HAD TOLD YOU ANYTHING  
22                  ABOUT THE CHURCH OR ITS MEMBERS DIFFERENT FROM WHAT HE HAD  
23                  ALREADY TOLD YOU BEFORE THAT THAT YOU DIDN'T SAY, "WELL, HE  
24                  HAD THIS BEAST OF BLASPHEMY THING AT THAT TIME"?

25                  A     I HADN'T SEEN GREGORY MULL FOR, WHAT, SIX  
26                  MONTHS, SEVEN MONTHS, AND THEN I HADN'T SEEN HIM EXCEPT FOR  
27                  THOSE FEW TIMES IN MARCH OR APRIL OF '84 WHEN HE CAME IN.  
28                  AND AFTER THAT DEPOSITION, I SAT DOWN, I READ IT, I WENT

1 THROUGH IT, AND I STARTED THINKING BACK, AND I STARTED  
2 REMEMBERING, AND IT JUST JOGGED MY MEMORY AND I JUST HAVE  
3 BEEN CONSTANTLY REMEMBERING THINGS AS I WENT ALONG.

4 Q WERE YOU AWARE THAT AT THE END OF THE  
5 DEPOSITION, YOU WERE GIVEN ABOUT 30 DAYS TO SIGN THE  
6 DEPOSITION AND MAKE ANY CHANGES THAT YOU WANTED TO MAKE, AND  
7 THAT IF YOU DIDN'T MAKE THEM WITHIN I THINK IT WAS 30 DAYS,  
8 THEN THE DEPOSITION WOULD BE CONSIDERED A SWORN STATEMENT AS  
9 IT WAS?

10 A THAT'S RIGHT. THAT'S RIGHT.

11 Q WAS THERE ANY REASON WHY AFTER YOUR MEMORY WAS  
12 JOGGED ABOUT THIS BEAST OF BLASPHEMY THAT YOU DIDN'T CHANGE  
13 THE DEPOSITION AND WRITE IT IN?

14 A WELL, WHEN YOU ARE RETRIEVING MEMORY, ALL  
15 RIGHT, PART OF THE MEMORY THAT CAME UP WOULD COME UP AFTER I  
16 MAYBE WENT TO SEE GREGORY AGAIN, AND I TALKED TO HIM ABOUT  
17 THAT AND I REMEMBERED NOT SEEING HIM FOR THAT PERIOD OF  
18 TIME. AND THEN ALL OF A SUDDEN I REMEMBERED WHY HE CAME  
19 BACK AND WHY I SAW HIM THEN AND I REMEMBERED THAT IT WAS  
20 THIS BEAST OF BLASPHEMY THING. AND THEN I REMEMBERED TWO  
21 MONTHS LATER HE WAS IN THE HOSPITAL AND MY CONCERN FROM THAT  
22 POINT ON WAS THAT HE WAS IN THE HOSPITAL AND SICK.

23 SO UNTIL I HAD TIME TO GO OVER THE WHOLE THING  
24 IN MY MIND AND WATCH THE WHOLE THING AND SEE IT AS WHOLE, I  
25 HADN'T REMEMBERED IT.

26 Q WOULD YOU AGREE THESE ARE THE KIND OF PROBLEMS  
27 YOU RUN INTO WHEN YOU DON'T TAKE NOTES EITHER DURING OR  
28 AFTER THE COUNSELING SESSIONS?



1 A THEY CAN BE, YES.

2 I TELL YOU WHAT, IF I WAS --

3 MR. LEVY: THERE IS NO QUESTION PENDING RIGHT NOW,  
4 MA'AM.

5 Q BY MR. KLEIN: NOW, DID YOU EVER RECEIVE ANY  
6 DEGREE FROM A FOUR-YEAR COLLEGE?

7 A NO.

8 Q OR TWO-YEAR COLLEGE?

9 A NO. UNLESS YOU ARE REFERRING TO MY MASTER'S  
10 DEGREE?

11 Q NO. I MEANT ANOTHER GRADUATE DEGREE.

12 A NO.

13 Q NOW, YOU DID RECEIVE A ONE-YEAR BACHELOR'S  
14 DEGREE IN PSYCHOLOGY; IS THAT RIGHT?

15 A FROM U.W.W. INTERNATIONAL.

16 Q WHICH IS THE UNIVERSITY --

17 A UNIVERSITY WITHOUT WALLS.

18 Q AT THE TIME YOU RECEIVED THAT DEGREE, WAS IT AN  
19 ACCREDITED UNIVERSITY?

20 A NO. STATE APPROVED.

21 Q AND THEN YOU RECEIVED YOUR TRAINING AS A  
22 HYPNOTIST IN A PROGRAM -- WAS A ONE-YEAR PROGRAM AT THE  
23 HYPNOTIST MOTIVATION INSTITUTE?

24 A THAT'S RIGHT. VAN NUYS.

25 Q AND AS A HYPNOTIST, IS IT TRUE THAT YOU ARE NOT  
26 LICENSED BY THE STATE OF CALIFORNIA?

27 A THAT'S RIGHT.

28 Q NOW, IN THE ONE YEAR THAT YOU TOOK THAT PROGRAM

1 AT THE HYPNOTIST MOTIVATION INSTITUTE, CAN YOU GIVE US SOME  
2 IDEA AS TO WHAT PART OF THE PROGRAM IS ACTUAL CLASSROOM  
3 TEACHING AS OPPOSED TO ON-THE-JOB OBSERVATION OF OTHER  
4 PEOPLE WHO ARE ALREADY HYPNOTISTS DOING THEIR JOB?

5 A ARE YOU ASKING ME FOR THE AMOUNT OF HOURS AND  
6 HOW OFTEN THAT THEY ARE THERE IN CLASS OR WHAT?

7 Q I AM TRYING TO GET AN IDEA OF THE BREAKDOWN OF  
8 THAT ONE-YEAR TRAINING THAT YOU HAD AS TO 50 PERCENT IN  
9 CLASS, 50 PERCENT ON THE JOB OBSERVING SOMEBODY, THAT KIND  
10 OF THING.

11 A ALL RIGHT. THE FIRST YEAR IT WAS ALL CLASS.  
12 IT WAS BASIC HYPNOSIS AND ADVANCED HYPNOSIS AND  
13 DEMONSTRATIONS IN CLASS.

14 Q AND AS FAR AS BASIC HYPNOSIS AND ADVANCED  
15 HYPNOSIS, CAN YOU GIVE US SOME IDEA OF JUST WHAT THOSE  
16 CLASSES ENTAIL?

17 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR  
18 HONOR. IF HE WANTS A -- YOU WANT THE GROUNDS.

19 THE COURT: JUST A SECOND. I MENTIONED YESTERDAY WE  
20 ARE GOING TO HAVE ONE OF YOU OR THE OTHER, NOT BOTH. MR.  
21 MIDDLETON HAS TAKEN OVER RELATIVE TO THIS WITNESS. WE ARE  
22 NOT GOING TO HAVE TEAM PARTICIPATION.

23 MR. LEVY: FAIR IS FAIR.

24 THE COURT: OKAY.

25 MR. KLEIN: YOU CAN ANSWER THE QUESTION I THINK.

26 THE COURT: GO AHEAD.

27 THE WITNESS: ALL RIGHT. YOU WANT TO KNOW LIKE WHAT  
28 THEY TAUGHT?

1 Q BY MR. KLEIN: JUST GIVE US A GENERAL IDEA.

2 A THEY TAUGHT BASIC TECHNIQUES FOR PUTTING  
3 SOMEONE INTO HYPNOSIS, WHAT HYPNOSIS WAS ABOUT, ITS CONCEPT,  
4 ITS THEORY, HOW IT COULD BE USED. THEY TAUGHT ABOUT IT IN  
5 REGARDS TO MAYBE SLEEP OR EATING DISORDERS OR SOMETHING LIKE  
6 THAT, OR SEXUALITY.

7 Q WHAT CREDENTIALS, WHAT EDUCATIONAL CREDENTIALS  
8 DOES ONE NEED TO TAKE THAT ONE-YEAR HYPNOTIST MOTIVATION  
9 INSTITUTE COURSE?

10 A YOU WOULDN'T NEED ANY. JUST HAVE TO BE  
11 INTERESTED IN HYPNOSIS AND WANT TO GO AND LEARN IT.

12 Q SO DO YOU NEED TO BE A HIGH SCHOOL GRADUATE?

13 A TO GO TO HYPNOSIS MOTIVATION INSTITUTE?

14 Q YES.

15 A MAYBE. YOU MAY HAVE TO BE.

16 Q YOU ARE NOT SURE?

17 A I'M NOT SURE, NO.

18 Q NOW, I BELIEVE YOU TESTIFIED YESTERDAY WHEN MR.  
19 MIDDLETON GAVE YOU THAT WHOLE BUNCH OF ASSUMPTIONS, HE GAVE  
20 THE HYPOTHETICAL QUESTION, YOU SAID WELL, AS A RESULT OF  
21 THAT, IF YOU DID THAT, YOU WOULD BE ABLE TO CONTROL SOMEBODY  
22 WITH FEAR. A PERSON DOING IT WOULD BE PUT IN A DOMINEERING  
23 POSITION TO THE PERSON TO WHOM THEY DID IT.

24 IS THAT ACCURATE OR YOU WANT TO MAYBE ELABORATE  
25 MORE ON WHAT I SAID?

26 A I AM NOT EXACTLY SURE WHAT YOU ARE REFERRING  
27 TO.

28 Q MR. MIDDLETON GAVE YOU A NUMBER OF ASSUMPTIONS

1 ABOUT WITH THE SWORD, AND SAID PEOPLE SAY THIS AND PEOPLE  
2 SAY THAT AND THEY DECREE.

3 A YOU MEAN WHEN WE WERE TALKING ABOUT THE SHOCK  
4 INDUCTION?

5 Q I DON'T KNOW IF IT WAS THE SHOCK INDUCTION. HE  
6 THEN READ OFF SOME WORDS OF SOME KIND OF A PRAYER OR  
7 SOMETHING AND HE GAVE YOU ASSUME THAT SOMEBODY HAS BEEN  
8 DOING TWO TO THREE HOURS A DAY OF DECREES FOR SIX WEEKS, AND  
9 ASSUME THAT A SWORD IS PLACED AND ASSUME --

10 A WAS THAT THE PRAYER OF EXORCISM? IS THAT WHAT  
11 YOU ARE TALKING ABOUT?

12 Q MAYBE THAT IS WHAT IT WAS. HE SAID, "ASSUMING  
13 THAT, WHAT CONCLUSIONS COULD YOU REACH?"

14 YOU SAID, "WELL, I CONCLUDE IF YOU DID THAT,  
15 YOU WOULD BE ABLE TO CONTROL MR. MULL WITH FEAR. THE PERSON  
16 DOING IT WOULD BE PUT IN A DOMINEERING POSITION TO HIM."

17 IS THAT ACCURATE WHAT I JUST SAID?

18 A YES.

19 Q NOW, WHAT I WAS WONDERING ABOUT IS THAT  
20 CONCLUSION THAT YOU REACHED, IS THAT BASED ON YOUR EXPERTISE  
21 AS A HYPNOTIST, AS A MARRIAGE FAMILY CHILD COUNSELOR, AS  
22 BOTH OR SOMETHING ELSE? MAYBE YOU COULD TELL US.

23 A THAT CONCLUSION IS BASED ON BOTH -- ON ALL OF  
24 MY TRAINING, ON MY 6,000 HOURS OF TRAINING, JUST WHAT I  
25 KNOW.

26 Q WHEN YOU SAY, "6,000 HOURS OF TRAINING," AM I  
27 CORRECT WHAT YOU ARE SAYING IS THAT YOU WORKED FOR A NUMBER  
28 OF YEARS AS A HYPNOTIST? IS THAT THE 6,000 HOURS THAT WE

1 ARE TALKING ABOUT?

2 A YES.

3 Q SO IT IS NOT 6,000 HOURS OF SITTING IN A  
4 CLASSROOM?

5 A NO.

6 Q NOW --

7 A IT IS 6,000 HOURS OF COUNSELING AND USING  
8 HYPNOSIS UNDER THE SUPERVISION OF A LICENSED THERAPIST.

9 Q WHEN YOU WOULD COUNSEL THESE PEOPLE AS A  
10 HYPNOTIST, I TAKE IT PEOPLE IN THE NORMAL CASE WOULD COME  
11 IN, THEY WOULD HAVE A LOT OF STRESS AND ANXIETY AND YOU  
12 WOULD TRY TO GET THEM TO RELAX THROUGH HYPNOTISM; IS THAT A  
13 FAIR STATEMENT?

14 A YES.

15 Q IS THAT BASICALLY WHAT YOU DID FOR THOSE 6,000  
16 HOURS?

17 A YES.

18 Q NOW --

19 A TO DEAL WITH THEIR SYMPTOMS AS THEY PRESENTED  
20 THEM.

21 Q ALL RIGHT. NOW, IS IT YOUR BELIEF THAT HAVING  
22 SPENT 6,000 HOURS MEETING PEOPLE IN A CLINIC OR IN YOUR  
23 OFFICE AND TRYING TO RELIEVE THEIR ANXIETY BY HYPNOTIZING  
24 THEM GIVES YOU THE EXPERTISE TO REACH A CONCLUSION SUCH AS  
25 YOU'VE REACHED WITH THAT HYPOTHETICAL YESTERDAY ABOUT AS A  
26 RESULT OF THAT SITUATION, A PERSON WOULD BE CONTROLLED WITH  
27 FEAR, THE PERSON DOING IT WOULD BE PUT IN A DOMINEERING  
28 POSITION?

1                   IS THAT -- IS YOUR 6,000 HOURS OF PUTTING  
2 PEOPLE -- RELAXING THEM THROUGH HYPNOTISM, DID THAT GIVE YOU  
3 THE EXPERTISE TO SAY THAT IN YOUR OPINION?

4                   A       YES.

5                   Q       NOW, AS A MARRIAGE FAMILY CHILD COUNSELOR --  
6 LET ME BACK UP ONE MOMENT.

7                   WOULD I BE CORRECT THAT -- WELL, LET ME  
8 WITHDRAW THAT.

9                   IS THERE ANYTHING IN THOSE 6,000 HOURS, OTHER  
10 THAN MR. MULL, ANY EXPERIENCE THAT YOU HAVE HAD WITH  
11 RELIGIONS, WITH DECREERING THAT AIDED YOU IN REACHING THAT  
12 CONCLUSION?

13                  A       NO.

14                  Q       NOW, AS MARRIAGE AND FAMILY COUNSELOR -- I AM  
15 GOING TO GIVE YOU A DEFINITION OF WHAT YOUR EXPERTISE IS.  
16 YOU TELL ME IF YOU AGREE WITH THIS.

17                               "THAT A PRACTICE OF MARRIAGE  
18 FAMILY AND CHILD COUNSELING SHALL MEAN THAT  
19 SERVICE PERFORMED WITH INDIVIDUALS, COUPLES  
20 OR GROUPS WHEREIN INTERPERSONAL  
21 RELATIONSHIPS BETWEEN SPOUSES OR MEMBERS OF  
22 A FAMILY ARE EXAMINED FOR THE PURPOSE OF  
23 ACHIEVING MORE ADEQUATE, SATISFYING AND  
24 PRODUCTIVE MARRIAGE AND FAMILY ADJUSTMENTS.  
25 SUCH PRACTICE INCLUDES PREMARRIAGE  
26 COUNSELING."

27                               NOW, WHAT I READ YOU, SO THAT THERE IS NO  
28 SECRET, IS FROM SECTION 4980.02 OF THE BUSINESS AND

1 PROFESSIONS CODE.

2 WOULD YOU AGREE THAT THAT IS AN ADEQUATE  
3 DEFINITION OF WHAT A MARRIAGE FAMILY CHILD COUNSELOR DOES?

4 A YES, I WOULD.

5 Q NOW, IN MR. MULL'S CASE, WAS THE PROBLEMS  
6 RELATING TO THE CHURCH -- THEY DIDN'T INVOLVE ANYTHING THAT  
7 I JUST READ AS THE AREA OF EXPERTISE OF A MARRIAGE FAMILY  
8 CHILD COUNSELOR; ISN'T THAT CORRECT?

9 A COULD YOU BE CLEARER WITH YOUR QUESTION?

10 Q SURE. THE PROBLEMS THAT MR. MULL WAS TELLING  
11 YOU ABOUT WITH RESPECT TO THE CHURCH, THEY DIDN'T INVOLVE A  
12 MARRIAGE, THEY DIDN'T INVOLVE INTERPERSONAL RELATIONSHIPS  
13 BETWEEN SPOUSES OR MEMBERS OF THE FAMILY, DID THEY?

14 A THEY INVOLVED RELATIONSHIPS AT A VERY DEEP  
15 LEVEL. ELIZABETH CLARE PROPHET BEING REPLACED AS HIS GOD IN  
16 HIS MIND, THAT IS A VERY, VERY INTENSE RELATIONSHIP. I  
17 CAN'T THINK OF ONE THAT IS MORE INTENSE.

18 Q AND THAT IS MY QUESTION. THAT INTENSE  
19 RELATIONSHIP, WASN'T THAT BEYOND YOUR EXPERTISE AS A  
20 MARRIAGE AND CHILD FAMILY COUNSELOR?

21 A NO.

22 Q YOU ALSO TALKED ABOUT THAT TAPE. MR. MIDDLETON  
23 SHOWED YOU A TAPE YESTERDAY WHICH YOU SAID YOU WERE FAMILIAR  
24 WITH. IT IS A TAPE OF DECREES?

25 A THAT'S RIGHT.

26 Q AND MAYBE YOU CAN ELABORATE FOR ME. I HEARD  
27 SOMETHING ABOUT 2 MINUTES TO 15 TO 20 MINUTES COULD PUT  
28 SOMEONE INTO A HYPNOTIC STATE. I JUST GOT PART OF IT.

1 MAYBE YOU CAN FILL IN THE MISSING BLANKS THERE.

2 A YOUR QUESTION IS REAL CONFUSING TO ME.

3 Q DO YOU REMEMBER -- YOU DON'T REMEMBER  
4 TESTIFYING ABOUT SOMETHING IF SOMEONE LISTENS TO THE TAPE,  
5 SOME PEOPLE IT MIGHT ONLY TAKE 2 MINUTES, OTHER PEOPLE IT  
6 MIGHT TAKE AS MUCH AS 15 OR 20 MINUTES OF LISTENING TO THAT  
7 TAPE TO PUT THEM IN A HYPNOTIC STATE?

8 A YES. I SAID IT'S POSSIBLE. MOST PEOPLE  
9 LISTENING TO THAT TAPE COULD BE PUT INTO HYPNOSIS. THERE  
10 ARE SOME, YES, THAT COULD RESIST.

11 Q SO IS WHAT YOU ARE SAYING THAT IF WE JUST PLAY  
12 THAT TAPE IN THIS COURTROOM FOR -- LET'S TAKE THE MAXIMUM --  
13 15 TO 20 MINUTES, THE MAJORITY OF PEOPLE IN THIS COURTROOM  
14 WOULD THEN GO INTO A HYPNOTIC STATE?

15 A NO, I WOULDN'T SAY THAT.

16 Q YOU SAID MOST PEOPLE?

17 A MOST PEOPLE IN THAT PARTICULAR SETTING, THE  
18 CHURCH SETTING OR A SETTING WHERE THERE IS AN AUTHORITY  
19 FIGURE.

20 Q WE HAVE AN AUTHORITY FIGURE HERE. WE HAVE A  
21 JUDGE SITTING OVER THERE.

22 A I DOUBT WHETHER THIS AUTHORITY FIGURE OVER HERE  
23 WANTS TO GET CONTROL OVER EVERYBODY IN HERE. THERE IS A  
24 DIFFERENCE. THERE IS THE INTENT.

25 Q ISN'T IT CORRECT THAT WITHOUT KNOWING MORE  
26 ABOUT EACH AND EVERY PERSON, EVERY INDIVIDUAL, THAT YOU  
27 CAN'T MAKE ANY KIND OF CONCLUSION AS TO WHAT PERCENTAGE OF  
28 PEOPLE IN THIS ROOM OR IN THE CHURCH OR ANYWHERE ELSE, WHAT



1 PERCENTAGE WOULD BE -- WOULD GO INTO A HYPNOTIC STATE BY  
2 LISTENING TO A TAPE LIKE THAT?

3 A NO, YOU CAN'T DECIDE ON PERCENTAGE. WE JUST  
4 KNOW THAT THE MAJORITY OF PEOPLE LISTENING TO A DRONE FOR A  
5 VERY LONG PERIOD OF TIME BECOME HIGHLY SUSCEPTIBLE TO THE  
6 STATE OF HYPNOSIS OR TO AN AUTHORITY FIGURE TAKING OVER AND  
7 CONTROLLING AT THAT POINT IN TIME AND GIVING THEM THE  
8 SUGGESTIONS TO GET CONTROL. THEY ARE ABLE TO RECOGNIZE WHEN  
9 PEOPLE ARE RECEPTIVE.

10 Q WHEN PEOPLE GO INTO THIS VERY SUGGESTIVE STATE,  
11 HOW LONG DO THEY STAY IN IT?

12 A IN WHAT KIND OF CIRCUMSTANCES ARE YOU TALKING  
13 ABOUT?

14 Q WELL, THE STATEMENT YOU JUST MADE ABOUT, "WE  
15 KNOW THE PEOPLE LISTENING TO THIS DRONE FOR A PERIOD OF TIME  
16 BECOME -- GO INTO A STATE WHERE THEY ARE HIGHLY SUGGESTIVE,"  
17 AS YOU'VE JUST SAID IT, CAN YOU GIVE ME SOME KIND OF  
18 GENERALIZATION AS TO HOW LONG THEY STAY IN THAT STATE?

19 A THAT'S NOT EASILY ANSWERED, BUT I'M GOING TO  
20 TRY TO ANSWER YOU, OKAY.

21 HYPNOTIC SUGGESTION IS CUMULATIVE. THE MORE  
22 SOMEONE PRACTICES SOMETHING, THE MORE THEY DO IT, THE MORE  
23 THEY ARE SUSCEPTIBLE TO IT. IF THAT WAS, LET'S SAY, THE  
24 VERY FIRST TIME THEY LISTENED TO THE TAPE AND THEY WERE A  
25 SUSCEPTIBLE TYPE PERSON, THEY COULD STAY IN THAT STATE AS  
26 MUCH AS 30 SECONDS AFTER IT STOPPED OR THEY COULD STAY IN IT  
27 FOR SEVERAL HOURS UNTIL THEY JUST COME OUT BY THEMSELVES.

28 IF IT IS A SITUATION WHERE THEY ARE USING THIS

1           TAPE OR THESE KIND OF DECREES EVERY DAY, EVERY DAY, EVERY  
2           DAY IN AND OUT, THEN THEY BECOME VERY, VERY CONDITIONED.  
3           AND AS THEY BECOME VERY CONDITIONED, IF THE PROPER  
4           SUGGESTIONS ARE GIVEN THEM OVER A PERIOD OF TIME, THEN THEY  
5           CAN CONSTANTLY BE TRIGGERED BACK INTO THE HYPNOTIC STATE  
6           VERY EASILY OR JUST NOT COME OUT OF IT. SOME OF THEM JUST  
7           STAY FLOATING IN IT.

8           Q           WHEN YOU TALKED ABOUT HEARING THIS EVERY DAY IN  
9           AND OUT, THEY BECOME VERY CONDITIONED, DO YOU HAVE ANY  
10          PRACTICAL EXPERIENCE IN YOUR PRACTICE THAT YOU BASE THE  
11          CONCLUSION ON THAT YOU HAVE JUST GIVEN US ABOUT WHAT HAPPENS  
12          IF THEY HEAR IT EVERY DAY IN AND OUT?

13          A           DO YOU WANT TO REPEAT THAT QUESTION IN ANOTHER  
14          WAY FOR ME?

15          Q           SURE. YOU JUST TOLD US IF WE HEAR THESE  
16          DECREES EVERY DAY IN AND OUT, AND THEY BECOME VERY  
17          CONDITIONED AND THEY MIGHT NOT EVEN COME OUT OF IT EVER.

18                    WHAT I AM ASKING ABOUT IS IN YOUR PRACTICE,  
19          YOUR 6,000 HOURS PLUS YOUR MARRIAGE FAMILY CHILD COUNSELING,  
20          DO YOU HAVE ANY PRACTICAL EXPERIENCE FROM WHICH YOU ARE ABLE  
21          TO DRAW THAT CONCLUSION?

22          A           THE PRACTICAL EXPERIENCE THAT I HAVE WAS —  
23          WERE BASIC LIKE GREGORY MULL.

24          Q           I AM TALKING ABOUT OTHER THAN GREGORY MULL.

25          A           I HAVE HAD SOME.

26          Q           TELL ME WHAT PRACTICAL EXPERIENCE YOU HAD THAT  
27          LED YOU TO BE ABLE TO MAKE THAT CONCLUSION YOU JUST REACHED  
28          FOR US ABOUT WHAT HAPPENS IF YOU HEAR IT IN AND OUT EVERY

1 DAY AND THAT YOU BECOME VERY CONDITIONED?

2 A IT IS PART OF MY TRAINING TO KNOW THAT WHEN  
3 PEOPLE USE CERTAIN TECHNIQUES OVER AND OVER AND OVER AND  
4 OVER AND OVER AGAIN, THAT THEY BECOME CONDITIONED VERY  
5 EASILY AND THAT THEY BECOME VERY, VERY SUSCEPTIBLE.

6 IF I BRING SOMEONE IN AND I AM COUNSELING THEM,  
7 AND I AM GOING TO USE HYPNOSIS ON THEM, AND I GET THEM  
8 CONDITIONED FOR ME TO SAY, "FIVE, FOUR, THREE, TWO, ONE,  
9 ZERO, DEEP SLEEP," THEN I DON'T HAVE TO GO THROUGH A  
10 RELAXATION TECHNIQUE WITH THEM OR AN EYE FASCINATION  
11 TECHNIQUE WITH THEM. I CAN SAY, "FIVE, FOUR, THREE, TWO,  
12 ONE, ZERO, DEEP SLEEP," AND THEY ARE GONE.

13 Q CAN YOU DO THAT TO ALL YOUR PATIENTS?

14 A NO.

15 Q A FEW?

16 A SOME.

17 Q AND SO YOU COULDN'T TELL FOR ANY PARTICULAR  
18 PERSON WHETHER THAT WOULD BE THE CASE OR NOT; IS THAT FAIR  
19 TO SAY? EACH PERSON IS DIFFERENT?

20 A THAT'S RIGHT. THAT'S RIGHT.

21 Q AND SO WITH RESPECT TO MR. MULL OR ANY  
22 PARTICULAR CHURCH MEMBER, YOU COULDN'T SAY WHETHER THEY WERE  
23 OR WERE NOT IN A SITUATION WHERE EACH DAY HEARING THESE  
24 DECREES THEY WENT INTO THIS HYPNOTIC STATE OR NOT?

25 A HAVING WORKED WITH MR. MULL, I WOULD SAY THAT I  
26 COULD SAY THAT. I COULD SAY THAT HE IS A HIGHLY SUGGESTIBLE  
27 PERSON AND THAT HE IS EASILY HYPNOTISABLE.

28 Q NOW, WHEN YOU TALKED TO MR. MULL, I TAKE IT

1            THAT DURING THE COURSE OF YOUR INTERVIEWS, HE TOLD YOU A LOT  
2            OF FACTS ABOUT WHAT HAPPENED, ABOUT DECREERING, AND THE HOURS  
3            HE SPENT DECREERING AND THINGS LIKE THAT?

4            A            YES.

5            Q            AND DID YOU IN ANY WAY CHECK THEM OUT, SEE IF  
6            IN FACT THEY WERE TRUE?

7            A            CHECKED THEM OUT YOU MEAN WITH OTHER PEOPLE?

8            Q            WITH ANYBODY OR ANYTHING?

9            A            I TALKED TO OTHER PEOPLE.

10          Q            YOUR HUSBAND?

11          A            MY HUSBAND WAS ONE.

12          Q            WHO ELSE?

13          A            I TALKED TO DONALD TROWBRIDGE, I TALKED TO  
14          MARILYN MALEK, I TALKED TO RANDALL KING, I TALKED TO ELAINE  
15          KING, I TALKED TO DAVID PASSENGER.

16          Q            ALL OF THOSE WERE EX-MEMBERS OF THE CHURCH?

17          A            THAT'S RIGHT.

18          Q            IN FACT, MOST OF THEM HAVE TESTIFIED IN THIS  
19          CASE?

20          A            THAT'S RIGHT.

21          Q            NOW, YOU ALSO TESTIFIED THAT GREGORY MULL  
22          REACHED THE CONDITION WHERE ELIZABETH CLARE PROPHET WAS THE  
23          ONLY ONE THAT MATTERED, THE ONLY ONE WHO KNEW WHAT WAS  
24          RIGHT; IS THAT A CORRECT STATEMENT?

25          A            YES.

26          Q            WHAT EXPERTISE, YOUR MARRIAGE FAMILY CHILD  
27          COUNSELING OR YOUR HYPNOTIC BACKGROUND, WHAT WAS THE  
28          EXPERTISE THAT LED YOU TO BE ABLE TO REACH THAT CONCLUSION?

1 A JUST EXACTLY WHAT YOU SAID.

2 Q THOSE TWO?

3 A MY TRAINING, YOU KNOW, LET ME SEE -- I AM  
4 WATCHING GREGORY AND OBSERVING HIM, THAT HIS RESPONSES TO  
5 MOST THINGS WERE ABOUT ELIZABETH, THAT SHE HAD THE DOMINANT  
6 POSITION IN HIS MIND.

7 Q AND IS IT YOUR UNDERSTANDING THAT THAT WOULD BE  
8 A PROPER AREA FOR YOU TO GO INTO AS A MARRIAGE FAMILY CHILD  
9 COUNSELOR -- GREGORY MULL AND ELIZABETH CLARE PROPHET, HIS  
10 CHURCH, PRIEST-PENITENT -- THAT THAT WAS THE PROPER AREA FOR  
11 YOU TO GET INTO?

12 A YES.

13 MR. MIDDLETON: I WOULD OBJECT, YOUR HONOR. IT'S  
14 BEEN ASKED AND ANSWERED.

15 THE COURT: SUSTAINED.

16 Q BY MR. KLEIN: IS IT YOUR OPINION THAT THIS  
17 SUGGESTIVE STATE THAT GREGORY MULL WENT INTO, THAT ONLY  
18 ELIZABETH CLARE PROPHET WAS THE ONLY ONE WHO COULD DO THE  
19 SUGGESTING?

20 A YES. WHILE HE WAS IN THE CHURCH?

21 Q YES.

22 A IT WAS THE ONLY ONE THAT HE WAS CONDITIONED TO  
23 RESPOND TO.

24 Q SO THAT --

25 A TO THAT DEGREE.

26 Q SO THAT OTHER CHURCH OFFICIALS DID NOT HAVE  
27 THAT CONTROL OVER HIM?

28 A THEY HAD SOME CONTROL OVER HIM BECAUSE HE --

1           THEY REPRESENTED ELIZABETH CLARE PROPHET. BUT TO THAT  
2           DEGREE, THAT THEY REPRESENTED ELIZABETH CLARE PROPHET, TO  
3           THAT DEGREE THAT THEY HAD SOME CONTROL OVER HIM, BUT NOT  
4           TOTAL.

5           Q           SO TO THE EXTENT THAT YOU TESTIFIED THAT HE WAS  
6           UNDER THE CONTROL OF ALL THE CHURCH MEMBERS, YOU WOULD  
7           LIMIT --

8           A           ALL THE CHURCH MEMBERS? I AM NOT FOLLOWING --

9           Q           ALL THE CHURCH OFFICIALS. YOU WOULD LIMIT THAT  
10          ANSWER?

11          MR. MIDDLETON: YOUR HONOR, I WOULD OBJECT. HE IS  
12          MISCHARACTERIZING THE TESTIMONY OF THE WITNESS.

13          THE COURT: SUSTAINED.

14          Q           BY MR. KLEIN: DO YOU HAVE AN OPINION AS TO  
15          WHEN HE STOPPED -- LET ME BACK UP.

16                    DID THERE COME A TIME IN YOUR OPINION WHEN  
17          GREGORY MULL WAS IN A CONSTANT HYPNOTIC STATE?

18          A           WHEN A PERSON IS IN A STATE OF TERROR AND THAT  
19          TERROR WON'T GO AWAY, THEY ARE UNDER A STATE OF CONSTANT  
20          HYPNOSIS. IT CAN BE TRIGGERED VERY EASILY. IT CAN BE FROM  
21          A LIGHT STATE TO A MEDIUM STATE TO A DEEP STATE. IT DEPENDS  
22          ON THE DEGREE OF TERROR AT THE TIME.

23          Q           WAS GREGORY MULL IN SUCH A STATE?

24          A           A LOT OF THE TIME, YES.

25          Q           WHEN DID IT END?

26          A           I AM NOT SURE IT HAS.

27          Q           WHEN DID IT BEGIN?

28          A           WHAT, HIS STATE OF TERROR?

1 Q THE CONSTANT STATE.

2 A CONSTANT STATE OF TERROR, IT STARTED -- IT  
3 WOULD DEPEND ON HOW YOU WOULD CLASSIFY TERROR. THERE IS  
4 TIMES WHEN HE WAS INSIDE THE CHURCH THAT HE WAS UNDER A LOT  
5 OF TERROR WHERE THERE WAS A LOT OF FEAR AND CONFUSION, AND  
6 THERE WAS A TIME WHEN HE WAS KICKED OUT OF THE CHURCH WHERE  
7 HE STARTED BEING HARASSED BY EX-MEMBERS (SIC) CONTINUALLY  
8 THAT HE WAS BECOMING TERRORIZED.

9 AND THEN THERE WAS A TIME WHEN HE WAS CALLED  
10 BEAST OF BLASPHEMY WHEN THE TERROR TOOK OVER COMPLETELY.  
11 THAT WAS A HIGH DEGREE OF STRESS AND CREATES A HIGHLY  
12 SUSCEPTIBLE SUGGESTIBLE STATE.

13 Q WHILE HE WAS IN THE CHURCH, '75 TO 1980, THOSE  
14 YEARS, DID HE TELL YOU THAT HE HAD A HIGH DEGREE OF STRESS  
15 AND FEAR?

16 A IN -- FROM '75?

17 Q TO '80.

18 A TO '80? AT THE TIME THAT HE MOVED ON THE  
19 CHURCH CAMPUS, TO CAMELOT --

20 MR. MIDDLETON: EXCUSE ME, YOUR HONOR. I'D OBJECT TO  
21 THE FORM OF THE QUESTION. I DON'T BELIEVE MR. MULL EVER  
22 COUNSELED WITH HER WHILE HE WAS IN THE CHURCH.

23 THE COURT: PLEASE REPHRASE IT.

24 Q BY MR. KLEIN: I THOUGHT WHAT I ASKED WAS WHEN  
25 HE SPOKE TO YOU AND RELATED BACK HIS EXPERIENCES WHEN HE WAS  
26 IN THE CHURCH, DID HE SAY HE HAD A HIGH DEGREE OF STRESS?

27 A ARE YOU TALKING ABOUT THE TIME HE WAS LIVING ON  
28 CAMELOT IN CAMELOT OR -- BECAUSE YOU SAID FROM 1975 TO 1980.

1           THERE WAS DIFFERENT THINGS THAT TOOK PLACE THERE.

2           Q        THAT WOULD INCLUDE THE TIME HE WAS AT CAMELOT.

3           A        YES, HE WAS UNDER A LOT OF STRESS.

4           Q        AND DID HE SAY WHAT CAUSED THAT STRESS?

5           A        YES, HE DID.

6           Q        WHAT DID HE SAY CAUSED IT?

7           A        HE SAID THAT THERE WAS AN AGREEMENT THAT HE HAD  
8           WITH ELIZABETH CLARE PROPHET THAT IF HE CAME TO CAMELOT AND  
9           DESIGNED THE NEW JERUSALEM, THAT THEY WOULD TAKE CARE OF HIS  
10          ONGOING EXPENSES. WHEN HE GOT TO CAMELOT, WITHIN A VERY  
11          SHORT PERIOD OF TIME, THEY STARTED PRESSURING GREGORY MULL  
12          TO JOIN THE PERMANENT STAFF.

13          Q        YOU SAID THAT CAUSED HIM A LOT OF STRESS WHILE  
14          HE WAS A CHURCH MEMBER?

15          A        YES.

16          Q        ANYTHING ELSE?

17          A        THAT HE WAS JUST CONSTANTLY BEING PRESSURED BY  
18          MONROE SHEARER AND EDWARD FRANCIS.

19          Q        ANYTHING ELSE THAT CAUSED STRESS WHILE HE WAS A  
20          CHURCH MEMBER?

21          A        WELL, I AM THINKING. LET ME THINK.

22                    THE PROBLEM WITH KATHLEEN.

23          Q        ANYTHING ELSE THAT HE TOLD YOU CAUSED STRESS  
24          WHILE HE WAS A CHURCH MEMBER?

25          A        WOULD BE HIS -- HIS DIET, LONG HOURS. BUT I  
26          DON'T THINK THAT THESE THINGS RELATE TO YOUR FIRST QUESTION  
27          ABOUT FEAR.

28          Q        WELL, I JUST WANTED TO STICK WITH THE STRESS.



1 I SORT OF CHANGED IT.

2 ANYTHING ELSE THAT HE SAID CAUSED HIM STRESS  
3 WHILE HE WAS A CHURCH MEMBER?

4 A HE WAS HAVING TROUBLE PAYING HIS BILLS. THEY  
5 HAD BROKEN THEIR AGREEMENT AND I GUESS THAT WOULD BE  
6 STRESSING HIM OUT.

7 Q WHEN YOU USE THE TERM "STRESS," IS THAT THE  
8 SAME AS ANXIETY?

9 A AS THE SAME, NO. STRESS IS A RESULT, ENDS UP  
10 AS A RESULT OF ANXIETY, FEAR, PANIC, PRESSURE. THEN YOU GET  
11 STRESSED OUT.

12 Q WHAT ARE THE THINGS — DID HE TELL YOU THINGS  
13 THAT CAUSED HIM ANXIETY?

14 A JUST THE THINGS I WAS RELATING TO YOU.

15 Q SO THE SAME THINGS THAT YOU SAID CAUSED STRESS  
16 HE TOLD YOU CAUSED ANXIETY?

17 A YES. THEY CREATED ANXIETY AND FEAR FOR HIM.

18 THERE IS ANOTHER THING I MAY SAY, OKAY, THAT  
19 OCCURS TO ME IS I THINK PROBABLY THE BIGGEST THING THAT  
20 CREATED THE ANXIETY AND THE PANIC WAS THAT HE COULDN'T GET  
21 TO ELIZABETH CLARE PROPHET TO CLEAR UP THE PROBLEM THAT WAS  
22 GOING ON WITH THE AGREEMENT THAT THEY HAD THAT THE CHURCH  
23 WOULD PAY HIS ONGOING EXPENSES IF HE CAME TO CAMELOT.

24 HE ALWAYS FELT THAT IF HE COULD SIT DOWN AND  
25 HAVE A TALK WITH HER, THAT SHE'D UNDERSTAND IT AND IT WOULD  
26 BE CLEARED UP.

27 MR. KLEIN: YOUR HONOR, AT THIS TIME I WOULD ASK TO  
28 READ FROM THE DEPOSITION TRANSCRIPT PAGE 80, LINE 23,

1 THROUGH PAGE 81, LINE 22.

2 THANK YOU, YOUR HONOR.

3 I AM GOING TO READ SOME QUESTIONS AND ANSWERS,  
4 AND I'D LIKE YOU TO LISTEN TO THEM PLEASE AND TELL ME IF YOU  
5 RECALL BEING ASKED THESE QUESTIONS AND GIVING THESE ANSWERS.

6 "Q YOU MENTIONED A NUMBER OF  
7 INCIDENTS THAT HE TOLD YOU ABOUT THAT  
8 HAPPENED AFTER HE LEFT THE CHURCH THAT HE  
9 FELT CAUSED HIM ANXIETY AND YOU FELT CAUSED  
10 HIM ANXIETY; DO YOU REMEMBER THAT?

11 "A YES.

12 "Q WERE THERE INCIDENTS HE  
13 DESCRIBED TO YOU THAT OCCURRED WHILE HE WAS  
14 A MEMBER OF THE CHURCH THAT ALSO HE FELT  
15 AND YOU FELT CAUSED HIM ANXIETY?

16 "A YES.

17 "Q WHAT WERE THOSE, AS BEST YOU  
18 CAN RECALL?"

19 THEN THE QUESTION -- "DO YOU WANT TO  
20 REPEAT THE QUESTION?"

21 THE QUESTION WAS READ BACK.

22 AND YOUR ANSWER WAS, "JUST THAT IT  
23 WAS A LOT OF HOURS AND A LOT OF HARD WORK."

24 ANSWER -- NEXT QUESTION, "ANYTHING  
25 ELSE?"

26 "A ANYTHING ELSE --" I AM SORRY.

27 "Q ANYTHING ELSE?"

28 "A NOT THAT I RECALL.



1 AND YOU FELT CAUSED HIM ANXIETY?

2 "A YES.

3 "Q WHAT WERE THOSE, AS BEST YOU  
4 CAN RECALL?

5 "MR. LEVY: EXCUSE ME, COUNSEL.  
6 THAT'S SEEN -- I'M GOING TO OBJECT. THAT'S  
7 BEEN ASKED AND ANSWERED. SHE DESCRIBED HIS  
8 RECITATION OF WHAT HE TOLD HER ABOUT HIS  
9 EXPERIENCE.

10 "MR. KLEIN: NO. I DON'T BELIEVE IT  
11 HAS.

12 "MR. LEVY: IF YOU CAN ANSWER THE  
13 QUESTION, GO AHEAD.

14 "THE WITNESS: DO YOU WANT TO REPEAT  
15 THE QUESTION?

16 "MR. KLEIN: COULD YOU READ THAT ONE  
17 BACK?

18 "THE WITNESS: JUST THAT IT WAS A LOT  
19 OF HOURS AND A LOT OF HARD WORK.

20 "MR. KLEIN: ANYTHING ELSE?" AND I ALSO SAID  
21 AGAIN, "ANYTHING ELSE?"

22 THE ANSWER WAS, "NOT THAT I RECALL."

23 QUESTION BY ME, "ANY SPECIFIC  
24 INCIDENTS HE DESCRIBED?

25 "A NO. NOT THAT I REMEMBER."

26 Q NOW, WAS THERE A REASON WHEN I ASKED YOU THAT  
27 QUESTION DURING YOUR DEPOSITION THAT YOU DIDN'T DISCUSS ALL  
28 THESE OTHER THINGS THAT YOU'VE TOLD US HE TOLD YOU CAUSED

1 HIM STRESS WHILE HE WAS A CHURCH MEMBER?

2 A I DIDN'T REMEMBER AT THE TIME.

3 Q IS THERE --

4 MR. MIDDLETON: YOUR HONOR, I BELIEVE HE'S  
5 MISCHARACTERIZED WHAT'S GONE ON HERE. EARLIER IN THE  
6 DEPOSITION, SHE DESCRIBED OTHER INCIDENCES. AND HE FINALLY  
7 COMES DOWN TO THIS QUESTION TO HER AND THEN SAYS, "IS THERE  
8 ANYTHING ELSE?" AND SHE SAYS, "NO." BUT HE DIDN'T READ  
9 FROM OTHER PARTS OF THE DEPOSITION.

10 THE COURT: WHY DON'T YOU SAVE IT FOR REDIRECT.

11 MR. MIDDLETON: THANK YOU, YOUR HONOR.

12 Q BY MR. KLEIN: WHEN I READ YOU -- WHEN I ASKED  
13 YOU THIS QUESTION, I AM GOING TO READ IT AGAIN, I AM READING  
14 FROM PAGE 80, THIS TIME LINE 28:

15 "WERE THERE INCIDENTS HE  
16 DESCRIBED TO YOU THAT OCCURRED WHILE HE WAS  
17 A MEMBER OF THE CHURCH AND ALSO HE FELT AND  
18 YOU FELT CAUSED HIM ANXIETY?"

19 AND YOUR ANSWER WAS, "YES."

20 AND THEN IT WAS -- AND THEN I SAID,  
21 "WHAT WERE THOSE, AS BEST YOU CAN RECALL?"

22 AND IT WAS --

23 THE COURT: THIS HAS ALREADY BEEN --

24 MR. KLEIN: I WANT TO ASK THE WITNESS IF SHE  
25 UNDERSTOOD THE QUESTION AT THAT POINT --

26 THE WITNESS: AT THAT POINT --

27 Q BY MR. KLEIN: AS ASKING YOU TO TELL ME  
28 EVERYTHING THAT CAUSED HIM STRESS AND EVERYTHING THAT CAUSED

1 HIM ANXIETY?

2 A I COULDN'T ANSWER THAT RIGHT NOW. I MAY HAVE  
3 UNDERSTOOD YOU THEN, I MAY HAVE NOT.

4 THE COURT: YOU MEAN INCLUDING WHAT SHE MAY HAVE SAID  
5 IN -- EARLIER IN THE DEPOSITION? I DON'T UNDERSTAND THE  
6 QUESTION.

7 MR. KLEIN: I AM ASKING HER IF SHE CAN TELL ME NOW IF  
8 SHE WAS THINKING -- WELL, SHE'S ALREADY ANSWERED. COUNSEL  
9 CAN READ WHATEVER HE HAS.

10 Q TO THE EXTENT THAT YOU DID NOT GIVE ME OTHER  
11 STRESSES THAT YOU'VE MENTIONED HERE TODAY, WOULD THAT BE  
12 BECAUSE YOU JUST DIDN'T REMEMBER SINCE YOU DIDN'T HAVE ANY  
13 NOTES?

14 A I WOULD SAY SO. IT WAS LIKE I ANSWERED YOU  
15 EARLIER, AND I HAD TO SIT DOWN AND THINK ABOUT IT, AND TALK  
16 WITH GREGORY OVER IT AND BECAUSE A LOT OF -- GREGORY TOLD ME  
17 A LOT OF HIS EXPERIENCES IN THE BEGINNING. HIS SPEECH WAS  
18 SO PRESSURED ALL OF THE TIME THAT IT CAME OUT KIND OF  
19 JUMBLED AND IT WAS KIND OF -- FOR ME, IT TOOK A WHILE TO PUT  
20 ALL THE PIECES TOGETHER AND REMEMBER THEM AGAIN. IT HAD  
21 BEEN THAT LONG PERIOD OF TIME WHEN I HADN'T SEEN HIM SO I  
22 HAD FORGOTTEN A LOT.

23 Q WITH RESPECT TO SHOCK INDUCTION, WHICH YOU SAID  
24 YOU NEVER DO, HAVE YOU BEEN TRAINED IN SHOCK INDUCTION?

25 A YES.

26 Q HOW MUCH TRAINING DO YOU HAVE IN IT?

27 A HOW MUCH TRAINING DID WE HAVE IN IT? OKAY. IT  
28 WAS SOMETHING THAT WE SAW DEMONSTRATED. IT WAS SOMETHING

1            THAT WE WERE ALLOWED TO DO ON PEOPLE WHO COULD HANDLE IT.  
2            HOW MUCH TRAINING -- EXACTLY, I DON'T REMEMBER EXACTLY. IT  
3            COULD HAVE BEEN FOUR OR FIVE CLASSES IN IT.

4            Q            IT WAS NECESSARY THOUGH TO HAVE A CERTAIN  
5            AMOUNT OF TRAINING BEFORE YOU COULD LEARN HOW TO DO IT?

6            A            YES.

7            Q            COULD A PERSON LEARN IT FROM A BOOK?

8            A            YES, THEY COULD.

9            Q            SO IF I JUST READ A BOOK ON IT, THEN I COULD GO  
10            AND START SHOCK INDUCTION?

11            A            YOU COULD LEARN IT AND TRY IT. I WOULDN'T  
12            ADVISE IT.

13            Q            WOULD THE CHANCES FOR AN UNTRAINED PERSON -- I  
14            MEAN SOMEBODY WHO DIDN'T GO TO AN INSTITUTE, HYPNOTIC  
15            INSTITUTE OR ANY OTHER SIMILAR TYPE PROGRAM -- WHAT WOULD BE  
16            THE POSSIBILITIES IN YOUR OPINION THAT THEY COULD MASTER  
17            SHOCK INDUCTION?

18            MR. MIDDLETON: I'D OBJECT, YOUR HONOR. CALLS FOR A  
19            CONCLUSION ON THE PART OF THE WITNESS AS TO SOMEONE WHO IS  
20            UNTRAINED AND DOESN'T GO TO A PROPER PLACE WHAT THEIR  
21            POSSIBILITIES OF LEARNING IT ARE.

22            THE COURT: SHE CAN ANSWER IF SHE CAN.

23            YOU ARE SPEAKING OF A PERSON WHO WOULD BE  
24            UNTRAINED AND UNLICENSED?

25            MR. KLEIN: YES. JUST SOMEBODY IN THE GENERAL PUBLIC  
26            WHO DECIDED THEY WANTED TO START DOING SHOCK INDUCTION.

27            THE WITNESS: IT WOULD DEPEND ON THE INDIVIDUAL.  
28            THAT IS A VERY DIFFICULT QUESTION TO ANSWER. IT WOULD

1           DEPEND ON THEIR ABILITIES, YOU KNOW, WHETHER THEY COULD PICK  
2           THAT UP AND DO THAT, WHETHER THEY HAD THE GUTS TO DO IT.

3           Q       BY MR. KLEIN: SO AS FAR AS YOU ARE CONCERNED,  
4           IT IS POSSIBLE FOR SOMEONE JUST TO PICK UP A BOOK, READ  
5           ABOUT SHOCK INDUCTION, AND IF THEY HAVE THE GUTS TO DO IT  
6           AND THE ABILITY, THEN THEY CAN GO AROUND AND USE THIS SHOCK  
7           INDUCTION AND PUT PEOPLE INTO TRANCES?

8           A       NO. I -- I WOULD SAY THAT THEY WOULD HAVE TO  
9           HAVE MORE TRAINING. THEY WOULD HAVE TO BE ABLE TO  
10          UNDERSTAND SUSCEPTIBILITY.

11          Q       UNDERSTAND IT IN A WAY THAT YOU LEARN FROM --

12          A       THAT YOU COULD OBSERVE SOMEBODY, AND SEE THAT  
13          THEY WERE RECEPTIVE, AND WHEN THEY WERE RECEPTIVE AND AT  
14          WHAT POINT IN TIME TO DO IT.

15          Q       WOULDN'T BE EASY FOR SOMEBODY WHO DIDN'T  
16          RECEIVE ANY TRAINING, ANY FORMAL TRAINING, TO JUST GO OUT  
17          AND DO IT; IS THAT A FAIR STATEMENT?

18          A       YES AND NO. IT IS ONE OF THOSE YES AND NO  
19          ANSWERS. IT JUST DEPENDS ON THE INDIVIDUAL. SOME PEOPLE  
20          MAY HAVE THE TALENT AND THE ABILITY TO PICK THAT UP AND DO  
21          IT, OTHERS MAY NOT. I DON'T KNOW.

22          Q       DID YOU FEEL DURING THE YEARS THAT YOU WERE  
23          MEETING WITH GREGORY MULL THAT HE HAD EXTENSIVE EMOTIONAL  
24          PROBLEMS?

25          A       IN REGARDS TO --

26          Q       THE -- HIS EXPERIENCE WITH THE CHURCH THAT HE  
27          WAS RELATING TO YOU, FEARS.

28          A       AT THE TIME I WAS WORKING WITH GREGORY MULL AS



1 A LAY HYPNOTIST, I WAS CONCERNED ABOUT THE STRESS THAT HE  
2 WAS HAVING, ABOUT ALLEVIATING HIS SYMPTOMS, ABOUT BEING  
3 SUPPORTIVE, ABOUT TEACHING HIM SELF-HYPNOSIS, RELAXATION  
4 TECHNIQUES.

5 Q WELL, AM I CORRECT THAT YOU TESTIFIED THAT THE  
6 CHURCH EXPERIENCE HAS DAMAGED HIM AND EVEN NOW HE IS NOT  
7 WHAT HE ONCE WAS? IS THAT RIGHT?

8 A THAT'S RIGHT.

9 Q BY THE WAY, AM I CORRECT YOU DIDN'T KNOW HIM  
10 BEFORE HE ENTERED THE CHURCH?

11 A THAT'S RIGHT.

12 Q SO YOU ARE DOING SOME SPECULATION AS TO WHAT HE  
13 WAS BEFORE HE CAME IN WHEN YOU SAY HE'S NEVER GOING TO BE  
14 THE SAME AGAIN, RIGHT?

15 A THAT'S RIGHT.

16 Q AND DID IT EVER OCCUR TO YOU DURING THE COURSE  
17 OF TREATING HIM AS A HYPNOTIST THAT IF HE HAD SEVERE  
18 PROBLEMS, IF HE HAD GREAT FEARS, ANXIETIES, THAT YOU SHOULD  
19 RECOMMEND THAT HE SEE A PSYCHIATRIST OR PSYCHOLOGIST?

20 A IT OCCURRED TO ME.

21 Q DID YOU -- IS IT CORRECT TO STATE THAT EVEN  
22 THOUGH IT OCCURRED TO YOU, YOU FELT THAT WHATEVER PROBLEMS  
23 HE HAD, YOU, AS A HYPNOTIST, WERE CAPABLE OF CARING FOR HIM?

24 A I FELT VERY COMFORTABLE IN DEALING WITH GREGORY  
25 MULL AND THE PROBLEMS.

26 Q YOU SAID THAT HE HASN'T PAID YOU SINCE ABOUT  
27 THE THIRD SESSION; IS THAT RIGHT?

28 A THAT'S RIGHT.

1 Q AND IF HE WINS THIS CASE, IS IT YOUR  
2 EXPECTATION THAT YOU WILL GET THE \$5,000?

3 A I DIDN'T PUT IT THAT WAY TO HIM.

4 Q I ASKED WHETHER IT IS YOUR EXPECTATION THAT HE  
5 WINS A CERTAIN AMOUNT OF MONEY, THAT YOU WILL GET YOUR  
6 \$5,000?

7 A THAT IS WHAT I WOULD EXPECT.

8 Q WOULD IT ALSO BE YOUR EXPECTATION THAT IF HE  
9 LOSES THE CASE, THAT YOU PROBABLY WILL NEVER GET PAID FOR  
10 YOUR WORK?

11 A PROBABLY.

12 MR. KLEIN: THANK YOU. NO FURTHER QUESTIONS, YOUR  
13 HONOR.

14

15

REDIRECT EXAMINATION

16 BY MR. MIDDLETON:

17 Q YOUR TRAINING IN HYPNOSIS, IT COMES FROM  
18 ACTUALLY DOING IT?

19 A YES.

20 Q YOU SPENT OVER 6,000 HOURS DOING IT?

21 A THAT'S RIGHT.

22 Q YOU WEREN'T LEARNING IT, YOU WERE DOING IT?

23 A THAT'S RIGHT.

24 Q AND AT ONE POINT IN YOUR TESTIMONY, YOU SAID  
25 HARASSMENT TO GREGORY MULL BY EX-MEMBERS.

26 A OH, JEEZ, DID I? I AM SORRY.

27 Q YOU MEAN EX-MEMBERS?

28 A NO, I DON'T.

1 Q ALL RIGHT. YOU WERE TALKING ABOUT WHAT THEN?

2 A CHURCH MEMBERS.

3 Q CHURCH MEMBERS. ALL RIGHT.

4 NOW, MISS PROPHET ON THE STAND MADE A STATEMENT

5 THAT THE PURPOSE OF DECREEEING, OUTSIDE OF LEARNING HOW TO

6 DECREE, WAS TO MAKE A PERSON IN A RECEPTIVE CONDITION TO

7 GOD, OKAY. NOW, WOULD YOU AGREE THAT THE PURPOSE OF

8 DECREEEING MIGHT BE TO MAKE A PERSON IN A RECEPTIVE CONDITION

9 TO GOD?

10 A YES.

11 Q AND IN A RECEPTIVE CONDITION TO ANYTHING ELSE?

12 A YES.

13 Q JUST IN A RECEPTIVE CONDITION?

14 A YEAH. HIGHLY RECEPTIVE.

15 Q DECREEEING CAN DO THAT?

16 A YES, IT CAN.

17 Q WE ARE NOT TALKING ABOUT JUST LISTENING TO THE

18 TAPES NOW. WE ARE TALKING ABOUT PHYSICALLY SITTING DOWN AND

19 DOING THE DECREES.

20 A YES.

21 Q MORNING, NOON AND NIGHT?

22 A THAT'S RIGHT.

23 Q YOU BELIEVE THERE IS A PURPOSE TO THAT?

24 A YES, I DO.

25 Q AND NOW WITH REGARD TO -- COULD YOU TEACH

26 SOMEONE HOW TO HYPNOTIZE?

27 A YES, I COULD.

28 Q SOMEONE WOULDN'T HAVE TO GO TO A SCHOOL, THEY

1           COULD LEARN FROM SOMEONE WHO ALREADY KNEW?

2           A        YES.

3           Q        ISN'T IT TRUE THAT CERTAIN PEOPLE COME IN WITH  
4           A CERTAIN AMOUNT OF CHARISMA --

5           MR. KLEIN:  I AM GOING TO OBJECT AS TO LEADING, YOUR  
6           HONOR.

7           THE COURT:  SUSTAINED.

8           Q        BY MR. MIDDLETON:  HAVE YOU EVER HEARD OF MASS  
9           HYPNOTISM?

10          A        YES.

11          Q        HITLER?

12          A        YES.

13          Q        MESMERISING?

14          A        YES.

15          MR. MIDDLETON:  THANK YOU.

16          THE COURT:  ANYTHING ELSE?

17          MR. KLEIN:  NO FURTHER QUESTIONS, YOUR HONOR.  THANK  
18          YOU.

19          THE WITNESS:  THANK YOU.

20          MR. LEVY:  YOUR HONOR, AT THIS TIME WE'D CALL  
21          MARGARET T. SINGER TO THE STAND.

22          THE COURT:  ALL RIGHT.

23          MR. LEVY:  MAY WE HAVE JUST A FEW MOMENTS?  SHE IS  
24          OUTSIDE IN THE COURTROOM.

25          THE COURT:  WHY DON'T WE TAKE A RECESS AT THIS TIME.

26          MR. LEVY:  YOUR HONOR, BEFORE WE TAKE A RECESS, MAY  
27          THIS WITNESS REMAIN IN THE COURT UNLESS MR. KLEIN HAS ANY  
28          OBJECTIONS?

1 MR. KLEIN: I HAVE NO OBJECTIONS SUBJECT TO WHAT WE  
2 TALKED ABOUT THIS MORNING.

3 THE COURT: SUBJECT TO WHAT?

4 MR. KLEIN: TO WHEN I BEGIN MY CASE, WHICH WE TALKED  
5 ABOUT THIS MORNING, BUT I HAVE NO OBJECTIONS TO THAT.

6 THE COURT: SHE CAN REMAIN.

7 MR. LEVY: THANK YOU, YOUR HONOR.

8 (RECESS.)  
9  
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1 LOS ANGELES, CALIFORNIA; WEDNESDAY, FEBRUARY 26, 1986

2 11:00 A.M.

3 DEPARTMENT NO. 50 HON. ALFRED L. MARGOLIS, JUDGE  
4 (APPEARANCES AS NOTED ON TITLE PAGE.)

5  
6 THE COURT: PLEASE PROCEED.

7 MR. LEVY: YOUR HONOR, AT THIS TIME WE'D LIKE TO  
8 PRESENT DR. MARGARET T. SINGER.

9  
10 MARGARET T. SINGER,

11 CALLED AS A WITNESS BY THE DEFENDANT, WAS SWORN AND  
12 TESTIFIED AS FOLLOWS:

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

16 THE WITNESS: MARGARET, M-A-R-G-A-R-E-T, MIDDLE  
17 INITIAL T, LAST NAME S-I-N-G-E-R.

18 THE CLERK: THANK YOU.

19  
20 DIRECT EXAMINATION

21 BY MR. LEVY:

22 Q MRS. SINGER, DO YOU PREFER TO BE REFERRED TO AS  
23 MRS. SINGER OR DR. SINGER?

24 A EITHER ONE.

25 Q FOR PURPOSES OF THIS TRIAL, OUT OF COURTESY,  
26 LET'S REFER TO YOU AS YOUR PROFESSIONAL TITLE. WHAT IS  
27 THAT, DOCTOR?

28 A DR. MARGARET SINGER.

1 Q WHAT IS IT YOU ARE A DOCTOR OF?

2 A PSYCHOLOGY AT THE UNIVERSITY OF CALIFORNIA,  
3 BERKELEY AND AT THE UNIVERSITY OF CALIFORNIA, SAN FRANCISCO.

4 Q NOW, COULD YOU TELL US BRIEFLY WHAT YOUR  
5 EDUCATIONAL BACKGROUND IS?

6 A YES, SIR. I RECEIVED A PH.D. IN CLINICAL  
7 PSYCHOLOGY FROM THE UNIVERSITY OF DENVER IN 1952.

8 Q NOW, IN KEEPING WITH YOUR EDUCATIONAL  
9 BACKGROUND, DO YOU ALSO TEACH PSYCHOLOGY?

10 A YES, SIR.

11 Q AND WHERE DO YOU DO THAT?

12 A I TEACH PSYCHOLOGY AT THE UNIVERSITY OF  
13 CALIFORNIA IN BERKELEY IN THE GRADUATE PROGRAM FOR CLINICAL  
14 PSYCHOLOGY AND I ALSO TEACH IN THE DEPARTMENT OF PSYCHIATRY  
15 AT THE UNIVERSITY OF CALIFORNIA, SAN FRANCISCO MEDICAL  
16 CENTER.

17 Q DO YOU HOLD A CURRENT STATE LICENSE?

18 A YES, SIR.

19 Q AND WHAT DO YOU HOLD A STATE LICENSE IN?

20 A IN CLINICAL PSYCHOLOGY AND I'VE HELD THIS  
21 LICENSE SINCE 1958.

22 Q NOW, IN THE PURSUIT OF YOUR PROFESSION, HAVE  
23 YOU RECEIVED ANY HONORS?

24 A YES, I HAVE.

25 Q WOULD YOU TELL US WHAT THEY ARE?

26 A YES, SIR. I'VE RECEIVED THE HOFHEIMER PRIZE  
27 FOR RESEARCH FROM THE AMERICAN PSYCHIATRIC ASSOCIATION IN  
28 1966. AND IN 1976, I RECEIVED THE STANLEY DEAN AWARD FOR

1 RESEARCH IN SCHIZOPHRENIA FROM THE AMERICAN COLLEGE OF  
2 PSYCHIATRISTS.

3 AND IN 1977, I RECEIVED THE MC ALPIN AWARD FOR  
4 ACHIEVEMENT IN RESEARCH FROM THE MENTAL HEALTH ASSOCIATION  
5 OF THE UNITED STATES. AND IN 1977, I RECEIVED THE RESEARCH  
6 SCIENTIST AWARD FROM THE NATIONAL INSTITUTE OF MENTAL  
7 HEALTH.

8 AND IN 1981, I RECEIVED THE AMERICAN FAMILY  
9 THERAPY ASSOCIATION AWARD FOR DISTINGUISHED ACHIEVEMENT IN  
10 FAMILY THERAPY RESEARCH. AND IN 1981, I RECEIVED THE LEO J.  
11 RYAN MEMORIAL AWARD FOR RESEARCH ON CULTS. IN 1982, I  
12 RECEIVED THE DISTINGUISHED TEACHING AWARD FROM THE NORTHERN  
13 CALIFORNIA SOCIETY OF CLINICAL HYPNOSIS.

14 AND IN 1972 AND 1973, I WAS PRESIDENT OF THE  
15 AMERICAN PSYCHOSOMATIC SOCIETY. AND IN 1975, I WAS ON  
16 PRESIDENT FORD'S BIOMEDICAL RESEARCH PANEL FOR SOCIAL AND  
17 DEVELOPMENTAL SECTIONS.

18 Q NOW, HAVE YOU EVER PARTICIPATED ON ANY  
19 EDITORIAL BOARDS?

20 A YES, SIR.

21 Q SINCE THERE IS A WHOLE LIST OF THEM, RATHER  
22 THAN ASK YOU THE WHOLE LIST, WAS ONE OF THOSE EDITORIAL  
23 BOARDS WITH REGARD TO CULTIC STUDIES?

24 A YES, SIR. I AM ON THE EDITORIAL BOARD OF THE  
25 CULTIC STUDIES JOURNAL.

26 Q NOW, IN THE COURSE OF THE PURSUIT OF YOUR  
27 PROFESSION, HAVE YOU RECEIVED ANY NUMBER OF SERVICE AWARDS  
28 FOR YOUR CONTRIBUTIONS TO STUDY IN THAT AREA?



1 A YES, SIR.

2 Q NOW, WITHOUT GOING THROUGH THE WHOLE LIST OF  
3 THEM, HAVE SOME OF THOSE SERVICE AWARDS DIRECTED THEMSELVES  
4 TOWARD CULTIC STUDIES, AND HYPNOSIS, AND FAMILY COUNSELING  
5 AND THERAPEUTIC TECHNIQUES FOR PEOPLE WHO HAVE SUFFERED THE  
6 EFFECTS OF CULTIC EXPERIENCES?

7 A YES, SIR.

8 Q AND THERE IS A WHOLE LIST OF PROFESSIONAL  
9 MEMBERSHIPS. WITHOUT GOING THROUGH THAT ENTIRE LIST OF ALL  
10 THE PROFESSIONAL MEMBERSHIPS, WHICH ARE NUMEROUS, DO MOST OF  
11 THEM DEAL WITH PSYCHOLOGY AND THE EFFECT OF CULTIC  
12 EXPERIENCES ON PEOPLE?

13 A THEY DON'T ALL HAVE TO DO WITH THAT. SOME OF  
14 THE MEMBERSHIPS OF GROUPS THAT I BELONG TO ARE PROFESSIONAL  
15 ASSOCIATIONS DEDICATED TO THE STUDY OF PEOPLE'S RESPONSES TO  
16 STRESS, EITHER SOCIAL AND NATURAL DISASTER STRESSES, OR  
17 PEOPLE WHO HAVE BEEN TAKEN HOSTAGE OR ARE KIDNAP VICTIMS OR  
18 VICTIMS OF TERRORISM. SO THAT I WORK WITH PEOPLE AND WITH  
19 GROUPS THAT STUDY HIGH STRESS, HIGH CONTROL SITUATIONS.

20 Q HAVE YOU EVER PARTICIPATED IN ANY PROFESSIONAL  
21 CAPACITY WITH MILITARY PERSONNEL?

22 A YES, SIR.

23 Q WOULD YOU TELL US ABOUT THAT?

24 A YES, SIR. I WORKED FOR THE UNITED STATES ARMY  
25 DURING AND AFTER THE KOREAN WAR STUDYING THE RESPONSES OF  
26 PEOPLE WHO HAD BEEN HELD AS PRISONERS OF WAR IN KOREA AND  
27 DID A FOLLOW-UP STUDY TO SEE HOW THOSE PEOPLE WERE FIVE  
28 YEARS AFTER THEY WERE REPATRIATED BACK TO THE UNITED STATES

1 AND HAVE STUDIED OTHER PEOPLE THAT WERE SUBJECTED TO STRESS.

2 I'VE BEEN A CONSULTANT TO THE UNITED STATES  
3 MILITARY ACADEMY AT WEST POINT FOLLOWING THE CAREERS OF  
4 CADETS TO SEE HOW THEY DID IN TERMS OF HANDLING STRESS.

5 AND I HAVE BEEN A CONSULTANT TO THE  
6 WRIGHT-PATTERSON AIR FORCE BASE STUDYING PEOPLE'S RESPONSE  
7 TO G-TOLERANCE AND FLIGHT TRAINING.

8 AND HAVE BEEN A CONSULTANT TO THE SCHOOL OF  
9 AVIATION MEDICINE FOLLOWING WITH THEM THE STUDIES OF PEOPLE  
10 WHO HAD BEEN PRISONERS OF WAR IN VIET NAM AND STRESSES  
11 SUFFERED BY THEM.

12 Q AND AS PART OF THAT WORK, DID YOU ALSO WORK AT  
13 WALTER REED ARMY HOSPITAL?

14 A YES, SIR. I WAS THE SENIOR PSYCHOLOGIST IN THE  
15 LABORATORY OF PSYCHOLOGY AT THE WALTER REED ARMY INSTITUTE  
16 OF RESEARCH IN WASHINGTON, D.C.

17 Q NOW, I AM NOT GOING TO WEAR YOU OUT BY TAXING  
18 YOU WITH ASKING YOU TO REPEAT THE PUBLICATIONS YOU HAVE  
19 CONTRIBUTED IN THE FIELD. I WOULD LIKE YOU TO -- I SEE YOU  
20 HAVE A LISTING THERE. I HAVE SOME SIX OR SEVEN OR EIGHT  
21 SINGLE-SPACE TYPEWRITTEN PAGES.

22 COULD YOU BRIEFLY POINT OUT ONE OR TWO OF THOSE  
23 MANY ARTICLES THAT DEAL WITH YOUR INVOLVEMENT IN CULTIC  
24 STUDIES?

25 A YES, SIR. PERHAPS THE ONES THAT ARE OF MOST  
26 INTEREST TO YOU IS ONE ARTICLE I DID IN 1980 WITH DR. L.J.  
27 WEST, WHO IS THE CHAIRMAN OF DEPARTMENT OF PSYCHIATRY HERE  
28 AT U.C.L.A. MEDICAL CENTER, CALLED "CULTS, QUACKS, AND THE

1 NONPROFESSIONAL PSYCHOTHERAPIES," IN WHICH WE EXPLAINED  
2 THERE TO THE PSYCHIATRIC AND MEDICAL READERS WHAT HIGH  
3 CONTROL GROUPS WERE AND SO ON.

4 AND I ALSO WROTE AN ARTICLE CALLED "COMING OUT  
5 OF THE CULTS" THAT APPEARED IN PSYCHOLOGY TODAY IN 1979  
6 WHERE THE ARTICLE DEALT WITH SOME OF THE MANY HUNDREDS OF  
7 PEOPLE THAT I HAD STUDIED AND WORKED WITH AT THAT POINT WHO  
8 HAD BEEN IN ONE OR ANOTHER OF THE MODERN DAY CULTS.

9 AND I ALSO WROTE AN ARTICLE CALLED "CULTS" FOR  
10 THE SCHOLASTIC MAGAZINE'S VERSION CALLED FORECASTS FOR HIGH  
11 SCHOOL TEACHERS SO THEY GOT AN EXPLANATION OF WHAT IS A  
12 CULTIC ORGANIZATION TO USE IN TEACHING OF HIGH SCHOOL  
13 STUDENTS.

14 AND I'VE GOT AN ARTICLE THAT'S JUST COMING OUT  
15 NOW CALLED "CONSULTATION WITH FAMILIES OF CULTISTS."

16 AND I ALSO HAVE AN ARTICLE THAT IS IN PRESS NOW  
17 IN THE MERCK MANUAL, WHICH IS THE MOST WIDELY SOLD MEDICAL  
18 BOOK AROUND THE WORLD TODAY, AND THE TITLE OF THAT ARTICLE  
19 IS "THE PSYCHOTECHNOLOGY OF INTENSE INDOCTRINATION  
20 PROGRAMS."

21 AND I HAVE AN ARTICLE COMING OUT IN THE CULTIC  
22 STUDIES JOURNAL CALLED "ATTACKS ON PERIPHERAL VERSUS CENTRAL  
23 ELEMENTS OF SELF AND THE IMPACT OF THOUGHT REFORMING  
24 TECHNIQUES."

25 AND THOSE ARE ONES RELATED TO YOUR QUESTION,  
26 SIR.

27 Q THANK YOU. IN PREPARATION FOR YOUR TESTIMONY  
28 AT THIS TRIAL, DID YOU PREPARE A LIST OF THE MATERIAL THAT

1 YOU HAD STUDIED AND REVIEWED AND THE THINGS YOU HAD DONE  
2 PRIOR TO TESTIFYING?

3 A YES, SIR.

4 Q NOW, EVEN THOUGH THAT IS SEVERAL PAGES LONG, I  
5 THINK IT IS ALL PERTINENT. WOULD YOU BE KIND ENOUGH TO READ  
6 TO THE COURT WHAT IT IS YOU DID IN PREPARATION FOR YOUR  
7 TESTIMONY AT THIS TRIAL?

8 A I BEGAN BY READING -- WELL, I BEGAN BY LISTING  
9 THE READINGS. AND I'VE LISTED THE DEPOSITIONS THAT I READ.  
10 I'VE READ SIX VOLUMES OF MR. GREGORY MULL'S DEPOSITION, I  
11 READ THE DEPOSITION OF KATHLEEN LEVY, TWO VOLUMES OF  
12 ELIZABETH CLARE FRANCIS' DEPOSITION, THE DEPOSITION OF MR.  
13 RANDALL KING, THAT OF DR. AFSHAR. I READ THE AMENDED  
14 CROSS-COMPLAINT AND THE DEFENDANT'S TRIAL BRIEF.

15 THEN I READ A SERIES OF DOCUMENTS WRITTEN BY  
16 GREGORY MULL, MARILYN MALEK, MR. AND MRS. BEN MAR, SUSAN  
17 PIETRANGELO, A TEN-YEAR MEMBER OF THE CHURCH UNIVERSAL AND  
18 TRIUMPHANT, A DOCUMENT WRITTEN BY JOHN PIETRANGELO, WHO WAS  
19 A THIRTEEN-YEAR MEMBER, ONE BY SANDRA NILES, WHO WAS IN  
20 SEVEN YEARS, ONE BY DONALD TROWBRIDGE, WHO WAS A TWELVE-YEAR  
21 MEMBER, ONE BY SUSAN MULDNAUR, ONE BY CYNTHIA SCHWARTZ, ONE  
22 BY MAE GADPAILLE AND ONE BY KATHLEEN MUELLER.

23 I READ THE TRANSCRIPTS OF INTERVIEWS DONE OVER  
24 THE TELEPHONE WITH ANN TROWBRIDGE, DONALD TROWBRIDGE, DAVID  
25 AND RACHEL MURPHY, CHARLES AND CHERYL NILES, LUIS LEYVA,  
26 JOSEPH SZIMHART, STEVEN PAVUK AND I INTERVIEWED MR. RANDALL  
27 KING OVER THE PHONE.

28 IN PERSON I INTERVIEWED MR. GREGORY MULL IN

1 1982, AGAIN IN 1983 AND IN 1985 FOR APPROXIMATELY TEN HOURS.  
2 I INTERVIEWED ANN TROWBRIDGE IN 1985 FOR FIVE HOURS. AND IN  
3 '85 AND '86 I INTERVIEWED MR. DONALD TROWBRIDGE FOR A TOTAL  
4 OF EIGHT HOURS. I INTERVIEWED MRS. PAT BROWN IN 1986 FOR  
5 THREE HOURS. AND IN 1985 I INTERVIEWED MR. WILLIAM PURCELL  
6 FOR ELEVEN HOURS.

7 AND PRIOR TO THIS, I HAVE OVER THE YEARS HAD  
8 EIGHT CLIENTS, WHOSE NAMES I CAN'T CITE WHO WERE FORMER  
9 MEMBERS OF THE CHURCH, WHO CAME TO ME AFTER THEY HAD LEFT  
10 THE GROUP FOR COUNSELING.

11 THEN I STUDIED OTHER DOCUMENTS THAT WERE  
12 PROVIDED TO ME. AND DID YOU WANT ME TO READ THOSE?

13 Q IF YOU WOULD.

14 A ALL RIGHT. FIRST OF ALL, I READ A DOCUMENT  
15 CALLED "A WAY OF LIFE." IT IS THE CODE OF CONDUCT FOR  
16 STUDENTS OF SUMMIT UNIVERSITY. I READ AN ARTICLE CALLED "TO  
17 STUDENTS OF SUMMIT UNIVERSITY: ORIENTATION OUTLINE."

18 I PERUSED A BOOK CALLED "10,001: A HANDBOOK  
19 FOR SURVIVAL OF MAN" BY RALPH YANEY, A PSYCHIATRIST  
20 ASSOCIATED WITH THE GROUP. I READ A CRITIQUE OF THE GROUP  
21 BY ROBERT BURROWS CALLED "CHURCH UNIVERSAL AND TRIUMPHANT:  
22 THE SUMMIT LIGHTHOUSE." THIS WAS PUBLISHED IN 1984 BY THE  
23 SPIRITUAL COUNTERFEITS PRESS IN BERKELEY.

24 I READ APPROXIMATELY 100 PAGES OF INSERTS FOR  
25 USE IN DECREERING AGAINST THE E.R.A., JIMMY CARTER,  
26 NEIGHBORHOOD OPPOSITIONS AND FOR FAVORABLE SOLUTIONS TO  
27 I.R.S. PROBLEMS, COURT CASES AND SUITS AGAINST C.U.T.

28 I READ THROUGH THE NOTEBOOK OF MISS LINDA MULL

1 FROM HER SPRING QUARTER, 1980, AT SUMMIT UNIVERSITY. I READ  
2 A DOCUMENT CALLED "MAD. B'S MYTH" WRITTEN BY JOSEPH SZIMHART  
3 IN 1983. I HAVE READ THE HOUSE RULES OF THE C.U.T. SAN  
4 FRANCISCO COMMUNITY TEACHING CENTER.

5 I READ A 26 DECEMBER 79 LETTER, MOTHER VIA  
6 MONROE TO GREGORY MULL FOR MAKING A UNILATERAL ACTION. I  
7 READ THE VOW OF SERVICE, A STAFF PLEDGE TO MAINTAIN A VOW OF  
8 SILENCE ABOUT THE INNER WORKINGS OF THE ORGANIZATION.

9 I READ AN AGREEMENT MR. MULL HAD SIGNED FOR ALL  
10 POSSIBLE BREAKAGE TO PROPERTY THAT MIGHT HAPPEN WHILE HE WAS  
11 WITH THE GROUP. I READ A LETTER MR. MULL WROTE ON THE  
12 DOUBLE STANDARDS REGARDING MOVIE ATTENDANCE. I READ A  
13 LETTER ADDRESSED TO MR. MULL BY A DAUGHTER OF MR. MARK  
14 PROPHET.

15 I'VE READ APPROXIMATELY 12 TELEPHONE TREE  
16 DOCUMENTS. I READ A LETTER FROM MR. MULL TO C.U.T.  
17 REGARDING THE BUILDING CODE VIOLATIONS. I READ A LETTER  
18 DATED 9 JANUARY 81 BY MR. MULL TO THE ZONING ENFORCEMENT  
19 OFFICER, DEPARTMENT OF REGIONAL PLANNING. I READ A 27  
20 JANUARY 81 LETTER BY MR. MULL ENTITLED "TO WHOM IT MAY  
21 CONCERN."

22 I READ A DISPOSITION OF REMAINS DOCUMENT FROM  
23 THE C.U.T. I STUDIED A TRANSCRIPT OF A MEETING BETWEEN MR.  
24 MULL, MRS. PROPHET AND OTHERS TO SECURE A SIGNING OF A  
25 DOCUMENT. I READ THE VOW OF SERVICE, THE PLEDGE FOR A  
26 TRUSTEE OF THE SUMMIT LIGHTHOUSE STUDY GROUP.

27 I READ THE MONTESSORI INTERNATIONAL PRESCHOOL  
28 HANDBOOK AND GUIDELINES. THE DOCUMENT CALLED "DEVELOPING

1 EFFECTIVE DECREE AND STUDY GROUPS FOR THE CHURCH UNIVERSAL  
2 AND TRIUMPHANT." I READ THE LEVEL 2 SUMMIT UNIVERSITY 1980  
3 SPRING INFORMATION. I READ THE ORIENTATION OUTLINE.

4 I READ AN ANALYSIS OF C.U.T. WRITTEN BY  
5 PROFESSOR NEWTON FOWLER OF THE LEXINGTON THEOLOGY SEMINARY  
6 IN KENTUCKY. I READ PEOPLE MAGAZINE 1 JULY 85 TITLED  
7 "TURMOIL IN A CALIFORNIA CAMELOT." I READ THE CHURCH  
8 UNIVERSAL AND TRIUMPHANT'S REPLY TO PEOPLE MAGAZINE.

9 I SAMPLED APPROXIMATELY 50 TAPES OF RECORDINGS  
10 OF MRS. ELIZABETH PROPHET'S LECTURES AND DECREEING SESSIONS.  
11 I'VE STUDIED APPROXIMATELY 600 PAGES, BOTH LETTER AND LEGAL  
12 SIZE, OF CLIPPINGS FROM NEWSPAPERS AND MAGAZINES REGARDING  
13 C.U.T., MRS. PROPHET AND SUMMIT UNIVERSITY.

14 AND I MISTAKENLY TYPED ON TWICE THE TRANSCRIPT  
15 OF THE 6 JUNE 80 TAPED MEETING BETWEEN GREGORY MULL, MRS.  
16 PROPHET, MONROE SHEARER AND EDWARD FRANCIS.

17 Q THANK YOU VERY MUCH. IT APPEARS YOU DID YOUR  
18 HOMEWORK.

19 DR. SINGER, CAN YOU TELL US WHAT IS A CULT?

20 A A CULT, AS IT IS DEFINED IN THE MODERN DAY  
21 CURRENT CULT SENSE, HAS SEVEN FEATURES. FIRST, A CULT IS  
22 LED BY A SELF-APPOINTED PERSON WHO CLAIMS THAT THEY HAVE  
23 DISCOVERED SOME SPECIAL MISSION THAT CAUSES THEM TO  
24 SELF-APPOINT THEMSELVES.

25 SECONDLY, A CULT, AS I AM DEFINING IT FOR YOU  
26 TODAY, DIRECTS A VENERATION OF THE FOLLOWERS TO THE CURRENT  
27 LIVING LEADER OF THE GROUP RATHER THAN TO GOD OR ABSTRACT  
28 PRINCIPLES. SO THIS PERSON STARTS THE GROUP, THEN GETS THE

1 VENERATION DIRECTED TOWARD THEM.

2 USUALLY IN THE CURRENT CULTS, THE PURPOSES ARE  
3 SIMPLY TWO-FOLD, TO FUND RAISE AND TO RECRUIT MORE MEMBERS  
4 RATHER THAN TO PROVIDE SERVICE AND ALTRUISM FOR BOTH THE  
5 MEMBERSHIP AND THE SERVICE. THE TWO MAIN REASONS OF THE  
6 ACTIVITIES TEND TO BE FUND RAISING AND RECRUITMENT.

7 MOST OF THE CURRENT CULTS ARE CHARACTERIZED BY  
8 A DOUBLE SET OF ETHICS. THAT IS THAT DECEPTION CAN BE USED  
9 ON OUTSIDERS AND THE DECEPTION CAN BE USED ON CERTAIN  
10 MEMBERS WITHIN THE GROUP, BUT THAT CERTAIN PARTS OF THE CULT  
11 ARE TO BE TOLD THE TRUTH. WHEREAS IN THE OUTSIDE WORLD WE  
12 HAVE JUST ONE SET OF ETHICS, THAT YOU ARE TO TELL THE TRUTH  
13 TO EVERYBODY, WHETHER THEY ARE A MEMBER OF YOUR GROUP OR  
14 NOT. BUT WITHIN CULTS, THERE TEND TO BE THESE DOUBLE SETS  
15 OF ETHICS.

16 AND THE CURRENT CULTS TEND TO BE ELITIST IN THE  
17 SENSE THAT THEY CLAIM THAT THE MEMBERSHIP ARE BY THE VERY  
18 BEING OF MEMBERS SUPERIOR AND THAT ALL OF US ON THE OUTSIDE  
19 ARE LESSER. SO THAT THERE IS ELITISM IN CULTS.

20 THE SIXTH FEATURE OF CULTS IS THEY TEND TO BE  
21 TOTALITARIAN. THAT IS THE PERSON AT THE TOP TENDS TO HAVE  
22 THE SOLE AND ALMOST ULTIMATE POWER AND CONTROL OVER THE  
23 GROUP. SO THAT IT IS KIND OF A PYRAMID-SHAPED POWER AND  
24 DIRECTION STRUCTURE WITHIN A CULT.

25 AND THE SEVENTH FEATURE IS THAT CULTS TEND TO  
26 BE TOTALISTIC. THAT IS THAT THEY EVOLVE RULES TO COVER  
27 ALMOST EVERY FEATURE OF LIVING.

28 THOSE ARE THE FEATURES THAT I WOULD USE TO



1 DEFINE A CULT.

2 Q IN YOUR OPINION, IS CHURCH UNIVERSAL AND  
3 TRIUMPHANT A CULT?

4 A YES, SIR.

5 Q CAN YOU TELL US WHY YOU BELIEVE SO?

6 A YES, SIR. IF WE TAKE THOSE FEATURES THAT I  
7 JUST LISTED OFF, THAT THE LEADER IS SELF-APPOINTED, MRS.  
8 PROPHET, FROM THE DOCUMENTS AND SO ON THAT I HAVE STUDIED,  
9 IS SUCH A SELF-APPOINTED LEADER WHO CLAIMS TO HAVE A SPECIAL  
10 PURPOSE.

11 SECONDLY, THE VENERATION DOES APPEAR FROM THE  
12 PRACTICES, DOCUMENTS AND REPORTS TO BE DIRECTED TOWARD HER.

13 THIRDLY, IT DOES MEET THE CRITERIA OF PRIMARILY  
14 BEING IN THE BUSINESS OF RECRUITING AND FUND RAISING.

15 AND IN TERMS OF THE PRESENCE OF A DOUBLE SET OF  
16 ETHICS WITHIN THE GROUP, I LISTED SOME EXAMPLES HERE: THAT  
17 PEOPLE ARE TOLD WHEN THEY WRITE A CLEARANCE LETTER WITHIN  
18 THE GROUP, THAT THIS CLEARANCE LETTER IN WHICH THEY ARE TO  
19 LIST OFF THEIR SINS, ANY SEXUAL PROBLEMS, ANY ENEMIES THAT  
20 THEY HAVE AND SO ON, THAT THIS CLEARANCE DOCUMENT WILL BE  
21 BURNED. AND IT HAS BEEN MY DISCOVERY THAT THIS IS NOT SO.  
22 SO THAT THIS IS PART OF THE DOUBLE SET OF ETHICS. PEOPLE  
23 ARE TOLD THESE WILL BE BURNED, BUT THEY AREN'T ALL BURNED.

24 THERE APPEARS TO BE A DOUBLE STANDARD WITHIN  
25 THE GROUP FOR MRS. PROPHET AND CERTAIN OF THE PEOPLE AT THE  
26 TOP OF THE HIERARCHY TO LIVE RATHER COMFORTABLY WITH A VERY  
27 DIFFERENT STANDARD OF LIVING AND CONDUCT THAN THE PEOPLE AT  
28 THE LOWER ECHELONS IN THE GROUP. THAT THE LIVING

1 CONDITIONS, DRESS, FOOD AND CLOTHING ARE QUITE AT A DOUBLE  
2 STANDARD.

3 ALSO, IT IS MY DISCOVERY FROM STUDYING THESE  
4 VARIOUS DOCUMENTS, INTERVIEWS AND SO ON THAT THERE IS A  
5 DOUBLE SET OF ETHICS WORKING IN THE GROUP TO MANIPULATE  
6 MEMBERS WITHOUT THE MEMBERS BEING AWARE THAT THEY ARE BEING  
7 MANIPULATED. AND THAT THERE IS AN ATTEMPT TO CONCEAL  
8 INFORMATION IN ORDER TO MANIPULATE PEOPLE. SO THAT THE  
9 CRITERIA OF THE DOUBLE SET OF ETHICS IS PRESENT.

10 THE FIFTH CRITERIA ABOUT A CULT BEING AN  
11 ELITIST ORGANIZATION IS MET BECAUSE MY STUDIES REVEALED THAT  
12 THE CONTENT OF THE GROUP STATES THAT SPIRITUAL ADEPTS ARE TO  
13 RULE OVER INFERIOR PEOPLE.

14 MEMBERS ARE ALSO TOLD THAT CHILDREN BORN TO  
15 THEM WHILE THEY ARE IN C.U.T. ARE AVATARS, MEANING VERY  
16 SPECIAL PERSONS. AND THAT IF AS A MEMBER YOU LEAVE C.U.T.,  
17 ANY CHILDREN THAT YOU HAVE AFTER LEAVING WILL BE LESSER  
18 BEINGS.

19 THE GROUP IN TERMS OF ELITISM IS INTO  
20 SURVIVALIST BEHAVIOR. AND MEMBERS ARE TOLD THAT THEY WILL  
21 TAKE OVER THE PLANET, AND THEY ARE TOLD THAT, "IT IS OUR  
22 CHANCE ON THE PLANET," AND PEOPLE ARE INSTRUCTED TO KILL IN  
23 ORDER TO NOT LOSE THEIR CHANCE TO CLEAR THE PLANET.

24 NEXT, IN ORDER TO ESTABLISH THE ELITIST QUALITY  
25 OF THE GROUP, SHUNNING AND OSTRACISM IS USED VIA THE  
26 TELEPHONE TREE AND OTHER METHODS OF ANYBODY WHO LEAVES THE  
27 ORGANIZATION.

28 THERE IS ALSO ELITISM WITHIN THE GROUP BECAUSE

1           THERE ARE DIFFERENT STRATAS. THE COMMUNITY MEMBERS WHO LIVE  
2           OUT BUT MERELY ATTEND A TRAINING CENTER ARE REGARDED AS  
3           LESSER PEOPLE THAN THOSE WHO MOVE INTO A TEACHING CENTER.  
4           AND THEN AT THE TOP OF THE HIERARCHY ARE THOSE PEOPLE WHO  
5           MOVE INTO THE CAMELOT OR OTHER PROPERTIES.

6                         AND FINALLY, IT IS AN ELITIST ORGANIZATION  
7           BECAUSE MY STUDIES OF MR. MULL, OTHERS AND THE DOCUMENTS  
8           SUGGEST THAT THE ORGANIZATION REGARDS PEOPLE AS EXPENDABLE;  
9           THAT WHEN THEIR PURPOSE FOR THE GROUP HAS BEEN SERVED, THEY  
10          CAN BE DISCARDED.

11                        NOW, THE SIXTH CRITERIA OF A CULT,  
12          TOTALITARIAN, THE PAST AND CURRENT STRUCTURE AND BEHAVIOR OF  
13          C.U.T. INDICATES THAT MRS. PROPHET FRANCIS IS AT THE TOP AND  
14          IS THE RULING HEAD OF THE ORGANIZATION. AND FROM THEIR  
15          DOCUMENTS, THEIR FUTURE BEHAVIOR AS DESCRIBED IN THEIR  
16          DOCUMENTS IS THAT THE ORGANIZATION WOULD BE A SPIRITUAL  
17          TOTALITARIANISM WITH MRS. PROPHET FRANCIS AS ITS LEADER.

18                        FINALLY, THE SEVENTH FEATURE OF MEETING THE  
19          CRITERIA OF A CULT DEFINITION IS IS THE ORGANIZATION  
20          TOTALISTIC, MEANING DO THEY HAVE RULES THAT COVER ALMOST THE  
21          TOTAL GAMUT OF ALL BEHAVIOR? AND MY STUDIES AND INTERVIEWS  
22          INDICATE TO ME THAT THE ORGANIZATION DOES HAVE THIS TYPE OF  
23          BEHAVIOR.

24                        THEY CONTROL COMMUNICATION BY RESTRICTING IT.  
25          FOR EXAMPLE, WHEN STUDENTS GO TO SUMMIT LIGHTHOUSE, IN THE  
26          DOCUMENTS AS WELL AS THE INSTRUCTIONS, STUDENTS ARE TOLD TO  
27          REDUCE AND CUT OFF THE CONTACT WITH FAMILY AND FRIENDS  
28          OUTSIDE THE GROUP.

1                   THERE IS A RESTRICTION AND CONTROL OF  
2 SPONTANEOUS SPEECH BETWEEN THE STUDENTS AND THERE ARE  
3 CONTROLS OVER WHETHER PEOPLE OF THE OPPOSITE SEX CAN TALK  
4 TOGETHER. YOU ARE NOT SUPPOSED TO STAY IN A ROOM WITH A  
5 PERSON OF THE OPPOSITE SEX UNLESS YOU ARE MARRIED TO THEM,  
6 UNLESS OTHER PEOPLE ARE PRESENT FOR MORE THAN FIVE MINUTES.

7                   THERE ARE RULES ABOUT SEXUALITY. WHO MAY  
8 MARRY, WHEN AND IF YOU MAY HAVE CHILDREN ARE CONTROLLED FROM  
9 THE TOP AND SEXUALITY IS ALSO CONTROLLED BY PEOPLE BEING  
10 INSTRUCTED TO DECREE ONE-HALF HOUR BEFORE AND AFTER SEXUAL  
11 INTERCOURSE.

12                   THERE IS CONTROL OVER WHEN, IF AND WHAT DOCTOR  
13 TO SEE WHILE IN THE ORGANIZATION. AND IN ADDITION TO THIS,  
14 WHAT APPEAR TO BE CULT-CONTROLLED DOCTORS ALLEGEDLY BREAK  
15 CONFIDENCE AND PRESENT THE INFORMATION THAT THEY LEARN WHILE  
16 SEEING THE PEOPLE IN A PROFESSIONAL RELATIONSHIP BACK UP THE  
17 LADDER TO MRS. PROPHET FRANCIS.

18                   THAT THE GROUP IS TOTALISTIC IN ITS CONTROL IS  
19 ALSO EXTENDED TO THE KINDS OF CLOTHING, THE COLOR OF  
20 CLOTHING. AND ONE IS ONLY TO WEAR ONLY GOLD JEWELRY, NO  
21 BRASS, COPPER, SILVER. THAT GOLD JEWELRY IS TO BE WORN IF  
22 WORN.

23                   ALSO, IT IS TOTALISTIC IN THE CONTROL THROUGH  
24 THE TELEPHONE TREE FOR BANISHMENT AND SHUNNING SO THAT EVEN  
25 WHEN PEOPLE LEAVE THE GROUP THROUGH THE TELEPHONE TREE,  
26 WHICH IS A SERIES OF DOCUMENTS AND OTHER MEANS OF CONTACTING  
27 PEOPLE SO THAT FORMER MEMBERS WILL BE SHUNNED AND OSTRACIZED  
28 IN THE LOCALE TO WHICH THEY GO WHEN THEY LEAVE THE GROUP.

1                    ADDITIONAL EVIDENCE OF A TOTALISTIC CONTROL OF  
2 CONDUCT IS SEEN THAT THE VOTING PREFERENCES OF MRS. PROPHET  
3 FRANCIS ARE SHOWN TO THE MEMBERS AND HER SAMPLE BALLOT IS  
4 SHOWN TO THE MEMBERS WITH THE SUGGESTION OF IT BEING  
5 FOLLOWED. READING, MOVIES, TV AND TELEPHONE USE ARE  
6 RESTRICTED.

7                    SO THAT MY STUDY OF THE DOCUMENTS AND  
8 INDIVIDUALS SUGGEST THAT THE BEHAVIORS OF C.U.T. MEET THE  
9 CRITERIA FOR BEING A CULTIC ORGANIZATION.

10                  Q        ARE YOU FAMILIAR WITH THE TERM "CULT  
11 INDOCTRINEE SYNDROME"?

12                  A        YES, SIR. THIS WAS A PHRASE THAT GOT INTO THE  
13 LITERATURE IN THE MID-1970'S AND IS STILL USED. AND IT GOT  
14 INTO BOTH THE LEGAL AND PSYCHOLOGICAL AND PSYCHIATRIC  
15 LITERATURE BY PEOPLE NOTICING CERTAIN CHANGES IN PEOPLE  
16 THAT GOT INTO VARIOUS CULTIC ORGANIZATIONS

17                            AND WHAT PEOPLE REPORTED UNDER THIS CULT  
18 INDOCTRINEE SYNDROME WAS PEOPLE WOULD HAVE A VERY SUDDEN  
19 SHIFT IN THEIR VALUE SYSTEM. NOT SLOW SHIFTS IN VALUES AND  
20 BEHAVIOR THAT COME FROM SHEER AGING OR MORE EDUCATION OR  
21 MORE TRAINING, BUT THERE WOULD BE A SUDDEN ABRUPT CHANGE IN  
22 VALUES.

23                            RELATIVES AND FRIENDS IN DESCRIBING THE CULT  
24 INDOCTRINEE, OR WHAT GOT TO BE CALLED A CULT INDOCTRINEE  
25 SYNDROME, INCLUDED PEOPLE'S LANGUAGE, HOW THEY REASONED, THE  
26 THINGS THEY TALKED ABOUT GOT CONSTRICTED DOWN SO THAT THEY  
27 TENDED TO TALK IN THE JARGON LANGUAGE OF THE NEW GROUP, AND  
28 TO PRIMARILY RESTRICT THEIR CONVERSATION TO JUST THOSE

1 CONTENTS AND NOT TO USE REFLECTIVE THINKING, CONVERSATION  
2 BROADLY LIKE IN ORDINARY CONVERSATIONS.

3 THE THIRD THING UNDER THE CULT INDOCTRINEE WAS  
4 RELATIVES AND FRIENDS NOTED THAT PEOPLE GOT RATHER FIXED  
5 QUALITIES TO THE EMOTIONS THAT THEY DISPLAYED. IN SOME  
6 INSTANCES, PEOPLE SEEMED TOO OVERLY SMILE AND CHEERFUL AND A  
7 FORCED CHEERFULNESS. IN OTHERS, OTHER KIND OF Demeanor.

8 BUT PEOPLE NOTICED THAT IT WAS NOT ONLY THAT  
9 NARROWING OF LANGUAGE AND REASONING AND TOPICS TO TALK ABOUT  
10 IN CONVERSATIONS, BUT THAT IN THE CULT INDOCTRINEE SYNDROME,  
11 THE AFFECTIVE QUALITY OF THE PERSON BECAME MORE RESTRICTED.

12 AND PEOPLE REPORTED THAT THEIR RELATIVES OR  
13 FRIENDS SEEMED REGRESSED, MEANING THAT THEY HAD TURNED OVER  
14 SO MUCH OF THEIR DECISION-MAKING POWER TO THE CULT AND CULT  
15 LEADERS THAT THEY SEEMED MORE LIKE YOUNGSTERS THAN THEIR  
16 FORMER SELF.

17 PEOPLE ALSO NOTICED CHANGES BECAUSE MANY CULTIC  
18 GROUPS HAVE RESTRICTED DIETS. SO THAT PEOPLE OFTEN WOULD  
19 HAVE LOST WEIGHT AND WOULD ALSO HAVE CERTAIN PHYSICAL  
20 CHANGES DUE TO THE DIETARY CHANGES AND THE LONG HOURS OF  
21 WORK.

22 AND SOMETIMES VARIOUS PSYCHOPATHOLOGIES WOULD  
23 BE NOTED. THAT IS AFTER PEOPLE WERE IN A CULT A PERIOD OF  
24 TIME, CERTAIN THINGS ABOUT THEIR PSYCHOLOGICAL CONDITION  
25 WOULD BECOME OBVIOUSLY CHANGED TO RELATIVES, FRIENDS AND  
26 PROFESSIONALS STUDYING THEM.

27 AND THAT IS WHAT THE CULT INDOCTRINEE SYNDROME  
28 IN THE LITERATURE REFERS TO.

1 Q HAVE YOU MADE A STUDY OF THE SOCIAL AND  
2 PSYCHOLOGICAL PRACTICES AND PROCEDURES OF CHURCH UNIVERSAL  
3 AND TRIUMPHANT?

4 A I HAVE.

5 Q DID YOU CONCLUDE WHETHER OR NOT THESE PRACTICES  
6 CONSTITUTE A THOUGHT REFORM PROGRAM?

7 A YES, SIR. IT WAS MY CONCLUSION THAT THE  
8 PRACTICES, THE BEHAVIOR, THE CONDUCT CARRIED OUT IN CHURCH  
9 UNIVERSAL AND TRIUMPHANT IS THE CARRYING OUT OF A THOUGHT  
10 REFORM PROGRAM.

11 Q CAN YOU TELL US WHAT A THOUGHT REFORM PROGRAM  
12 IS?

13 A YES. A THOUGHT REFORM PROGRAM IS A KIND OF  
14 PSYCHOTECHNOLOGY FOR CHANGING PEOPLE'S BELIEFS AND  
15 BEHAVIORS. PRIMARILY IT IS A PSYCHOTECHNOLOGY IN WHICH  
16 THERE IS A SYSTEMATIC MANIPULATION OF SOCIAL AND  
17 PSYCHOLOGICAL INFLUENCE TECHNIQUES OF MANY KINDS TO GET A  
18 PERSON TO DROP THEIR OLD BELIEF SYSTEM, WHETHER IT IS A  
19 BELIEF SYSTEM ABOUT SCIENCE OR A BELIEF SYSTEM ABOUT HOW THE  
20 WORLD WORKS OR A BELIEF SYSTEM ABOUT PSYCHOLOGY OR POLITICS,  
21 TO PUSH THAT OLD BELIEF OF CAUSALITY OUT AND EXPRESS THE NEW  
22 BELIEF SYSTEM THAT MANAGEMENT WITHIN THE THOUGHT REFORM  
23 ORGANIZATION WANTS.

24 AND THERE HAVE TO BE SIX CONDITIONS PRESENT TO  
25 CARRY OUT A THOUGHT REFORM PROGRAM. THE CONDITIONS ARE THE  
26 FOLLOWING SIX: THE FIRST IS YOU NEED TO GET CONTROL OVER  
27 THE PERSON'S SOCIAL AND/OR PHYSICAL ENVIRONMENT. AND  
28 ESPECIALLY YOU NEED TO GET CONTROL OF THEIR TIME.

1 SECONDLY, TO RUN A THOUGHT REFORM ORGANIZATION,  
2 YOU NEED TO CREATE A SENSE OF POWERLESSNESS IN THE PERSON.  
3 THIS IS DONE BY SEPARATING THEM FROM THEIR PAST SOCIAL,  
4 PSYCHOLOGICAL, ECONOMIC SUPPORT SYSTEMS, GETTING THEM AWAY  
5 FROM THOSE OLD SUPPORT SYSTEMS, OFTENTIMES GETTING THEM TO  
6 CONTRIBUTE ALL OF THEIR MONEY TO THE ORGANIZATION, BUT TO  
7 CREATE A SENSE OF POWERLESSNESS IN THESE INDIVIDUALS IN ONE  
8 WAY OR ANOTHER.

9 THE THIRD FEATURE OF RUNNING A THOUGHT REFORM  
10 PROGRAM IS THAT MANAGEMENT LEVEL INDIVIDUALS MANIPULATE  
11 REWARDS, PUNISHMENTS AND EXPERIENCES IN WAYS TO INFLUENCE  
12 THE PEOPLE TO SUPPRESS THE DISPLAY OF THEIR OLD BEHAVIORS  
13 AND TO STOP EXPRESSING THEIR OLD BELIEF SYSTEMS ABOUT HOW  
14 THE WORLD WORKS.

15 MANAGEMENT ALSO MANIPULATES REWARDS,  
16 EXPERIENCES AND PUNISHMENTS IN ORDER TO ELICIT NEW BEHAVIOR  
17 THAT MANAGEMENT WANTS FROM PEOPLE.

18 THE FIFTH FEATURE, THE FIFTH CONDITION THAT HAS  
19 TO BE PRESENT IN ORDER TO CARRY OUT A THOUGHT REFORM PROGRAM  
20 IS THE PEOPLE BEING THOUGHT REFORMED HAVE TO BE UNAWARE THAT  
21 IT IS BEING DONE TO THEM. THEY HAVE TO BE UNAWARE THAT  
22 VARIOUS AND MULTIPLE SOCIAL AND PSYCHOLOGICAL MANIPULATIONS  
23 ARE BEING DONE TO THEM SO THAT THEY ARE IN AN UNINFORMED  
24 STATE, THEY ARE CHANGED A STEP AT A TIME AND THEY ARE  
25 UNAWARE THAT THEY ARE BEING MANIPULATED BY MANAGEMENT LEVEL  
26 INDIVIDUALS.

27 AND THE SIXTH FEATURE OR CONDITION THAT NEEDS  
28 TO BE PRESENT TO RUN A THOUGHT REFORM ORGANIZATION IS IT IS



1 DONE WITHIN A CLOSED SYSTEM OF LOGIC AND WITHIN A  
2 TOTALITARIAN AUTHORITY STRUCTURE. THAT IS IN ORDINARY  
3 TECHNIQUES, THERE IS NO COMPLAINT UPWARD TO MANAGEMENT,  
4 THERE IS NO MODIFICATION OF THE SYSTEM, THE SYSTEM IS  
5 UNMODIFIABLE, THE PERSON AT THE TOP STAYS IN CHARGE, THERE  
6 IS NO SENDING SUGGESTIONS UPWARD TO MANAGEMENT, AND ANY  
7 CRITICISM IS SUPPRESSED AND THE PERSON WHO STARTS TO  
8 CRITICIZE IS MADE TO APPEAR WRONG. THE SYSTEM REMAINS  
9 RIGHT. YOU, THE CRITIC, WILL BE SUPPRESSED AND SHOWN TO BE  
10 WRONG. AND AS PART OF THAT CLOSED SYSTEM OF LOGIC, THE TOP  
11 LEVEL MANAGER IS THE PERSON WHO RUNS AND KEEPS CONTROL.

12 SO THAT THOSE SIX FEATURES NEED TO BE PRESENT  
13 TO RUN A THOUGHT REFORM ORGANIZATION TO GET A PERSON TO  
14 SUPPRESS THEIR OLD BELIEF SYSTEM ABOUT HOW THE WORLD WORKS.

15 Q NOW, IF SOMEONE WERE EXPOSED TO THIS TYPE OF  
16 SYSTEM OVER A PERIOD OF TIME, SOMEONE IN A CONTROLLED  
17 ENVIRONMENT, HOW WOULD THAT AFFECT AN INDIVIDUAL? WHAT  
18 WOULD THE EFFECT OF A THOUGHT REFORM PROGRAM BE ON THAT  
19 INDIVIDUAL?

20 A WHAT IT DOES IS THE PERSON IS EXPOSED TO THIS  
21 NEW REALITY THAT IS CONTRIVED AND MANAGED BY MANAGEMENT AND  
22 THEY ARE UNAWARE THAT IT IS CONTRIVED AND MANAGED. AND A  
23 STEP AT A TIME, THEY START GETTING THEIR BEHAVIOR IN LINE  
24 WITH WHAT APPEARS TO BE THE ONLY WAY TO DO THINGS.

25 BECAUSE THERE ARE ENOUGH USUALLY IN A THOUGHT  
26 REFORM ORGANIZATION OF ALL MEMBERS AROUND TO MODEL THE  
27 BEHAVIOR THAT YOU ARE TO SHOW AND BECAUSE MANAGEMENT IS  
28 CONTROLLING REWARDS AND PUNISHMENTS, THEY ARE ABLE BECAUSE

1 THEY HAVE PRETTY MUCH GOT YOU DEPENDENT ON THE ORGANIZATION  
2 SOON IN YOUR CAREER, YOUR BEHAVIOR STARTS GETTING MORE AND  
3 MORE IN LINE WITH WHAT MANAGEMENT WANTS.

4 YOU START SUPPRESSING YOUR OLD BELIEF SYSTEMS,  
5 YOUR OLD REASONING, YOU START SUPPRESSING WHAT MANAGEMENT  
6 DOESN'T WANT BECAUSE THEY HAVE CONTROL OVER SO MUCH OF YOUR  
7 LIFE.

8 Q NOW, TELL ME IN YOUR PURSUIT OF YOUR PROFESSION  
9 AS A PSYCHOLOGIST, ARE YOU FAMILIAR WITH HYPNOSIS?

10 A YES, SIR.

11 Q IS THERE ANYTHING MYSTERIOUS OR MAGIC ABOUT  
12 HYPNOSIS?

13 A NO, SIR.

14 Q IS IT A STANDARD TECHNIQUE THAT IS TAUGHT IN  
15 MEDICAL SCHOOLS AND SCHOOLS OF PSYCHOLOGY AND SCHOOLS OF  
16 COUNSELING?

17 A YES, SIR. IT IS PRETTY WIDELY TAUGHT TODAY.

18 Q IS IT NOT A FACT THAT IN HOSPITALS, SAY IN BURN  
19 WARDS, THAT SHOCK INDUCTIONS ARE USED TO GET IMMEDIATE  
20 CONTROL OF AN INDIVIDUAL WHO IS IN A STATE OF SHOCK AS A  
21 RESULT OF, SAY, A SEVERE BURN?

22 MR. KLEIN: I AM GOING TO OBJECT AS TO LEADING, YOUR  
23 HONOR.

24 THE COURT: SUSTAINED.

25 Q BY MR. LEVY: TO YOUR KNOWLEDGE, ARE SHOCK  
26 INDUCTIONS EVER USED IN HOSPITALS?

27 A YES, SIR. MAYBE I SHOULD EXPLAIN WHAT A SHOCK  
28 INDUCTION IS. THAT IS WHEN SOMEBODY COMES INTO A CLINIC, A

1 HOSPITAL, AN EMERGENCY ROOM, AND THEY ARE JUST TERRIBLY OUT  
2 OF CONTROL AND UPSET, A SHOCK INDUCTION IS TO SUDDENLY CLAP  
3 YOUR HANDS, GET THEIR ATTENTION AND SAY SOMETHING TO THEM BY  
4 JUST CAPTURING THEIR ATTENTION.

5 AND IT SOUNDS ALL VERY MYSTERIOUS TO CALL IT A  
6 SHOCK TECHNIQUE. BUT IT IS THAT BASIC STEP IN INDUCING  
7 HYPNOSIS TO GET A VERY FOCALIZED CONCENTRATION, EVEN IF IT  
8 IS EVER SO BRIEF.

9 AND THIS IS DONE TO HELP PEOPLE THAT -- WHERE  
10 YOU OR SOMEBODY NEEDS TO REALLY QUICKLY GET THEIR ATTENTION  
11 AND GET IT CONCENTRATED IN THIS SPECIAL WAY WHERE THEY ARE  
12 CONCENTRATING ON YOU, IGNORING PERIPHERAL STIMULI, AND  
13 PRETTY MUCH LETTING GO OF THEIR CRITICAL JUDGMENT AND THEY  
14 ARE JUST FOCUSING ON WHAT'S TRANSPILING BETWEEN YOU AND  
15 THEM.

16 Q LET ME POSE A HYPOTHETICAL FOR YOU. IF I HAD  
17 THIS JURY DECREEEING FOR SEVERAL HOURS, AND THEN I TOLD THEM  
18 THERE WAS GOING TO BE AN EXORCISM CEREMONY WHERE THEIR  
19 CLEARANCE LETTERS WOULD BE BURNED AND ALL OF THEIR SINS  
20 CONFESSED WOULD BE TRANSPORTED TO GOD AND THEY WOULD BE FREE  
21 OF THEM FOREVER, AND AFTER THEY HAD BEEN DECREEEING FOR  
22 SEVERAL HOURS, I CAME OVER WITH A SWORD AND SCREAMED AT THE  
23 TOP OF MY LUNGS, "BLAZE, BURN AND BLAST," AND I SWUNG THE  
24 SWORD AROUND OR TOUCHED IT TO A PART OF THEM, WOULD THAT  
25 CONSTITUTE A SHOCK INDUCTION?

26 A IT COULD BECAUSE OF THIS INTENSENESS. THEY  
27 HAVE BEEN DECREEEING AND THE DECREEEING IS A FORM OF GETTING  
28 EXTREMELY CONCENTRATED -- THIS VERY ACTIVE BUT RECEPTIVE

1 CONCENTRATION GOING ON THE DECREERING, THE PUSHING OUT OF  
2 MIND OF REFLECTIVE THOUGHT AND THE DROPPING OF CRITICAL  
3 JUDGMENT ABOUT WHAT ONE'S DOING.

4 AND THEN TO DO SOMETHING VERY IMPRESSIVE LIKE  
5 WITH A SWORD AND HIGH DRAMA CAN BE EXTREMELY IMPRINTING,  
6 MEANING VERY VIVID IMAGERY AND VERY DEFINITE MEMORY OF THAT  
7 EPISODE AND REALLY CATCH A PERSON'S CONCENTRATION.

8 Q NOW, WOULD THE PERSON WHO WAS CONDUCTING THAT  
9 CEREMONY MAINTAIN SOME ONGOING SEMBLANCE OF CONTROL OVER THE  
10 INDIVIDUAL WHO WAS SUBJECTED TO THAT CEREMONY?

11 A THEY COULD.

12 Q IS COERCIVE PERSUASION A SYNONYM FOR THOUGHT  
13 REFORM?

14 A YES, SIR.

15 Q ARE THERE ANY OTHERS THAT YOU KNOW OF?

16 A INTENSE INDOCTRINATION PROGRAMS. SOMETIMES  
17 PEOPLE USE THE TERM BRAINWASHING, BUT THAT IS NOT A CORRECT  
18 OR TECHNICAL TERM FOR COERCIVE PERSUASION OR THOUGHT REFORM  
19 PROGRAMS.

20 Q IS THAT SOMETHING -- ARE YOU SAYING THAT IS  
21 SOMETHING THAT YOU WOULD SEE IN THE PULP MAGAZINES BUT NOT  
22 IN THE MEDICAL TEXTBOOKS?

23 A YES, SIR. YOU MIGHT SEE IT OCCASIONALLY USED  
24 IN PROFESSIONAL JOURNALS. BUT THIS TERM BRAINWASHING GOT  
25 INTO OUR VOCABULARY BACK IN 1951 WHEN A JOURNALIST  
26 TRANSLATOR IN HONG KONG MADE A MISTAKE. AND IN  
27 TRANSLATING -- SEE, THE TERM THOUGHT REFORM HAS BEEN IN THE  
28 TECHNICAL LITERATURE SINCE MAO TSE-TUNG INTRODUCED IT INTO

1 THE POLITICAL SCIENCE AND OTHER LITERATURE IN 1929.

2 AND MAO STARTED IN '29 SAYING THAT HE WAS GOING  
3 TO THOUGHT REFORM THE CHINESE POPULATION. AND THEN WHEN HE  
4 CAME INTO POWER IN '49, BETWEEN '49 AND EARLY '51 WAS REALLY  
5 THE PEAK OF THE INSTALLING OF THE THOUGHT REFORM PROGRAMS IN  
6 CHINA.

7 AND AS A MAN NAMED HUNTER, WHO WAS AN AMERICAN  
8 JOURNALIST WHO WAS IN HONG KONG INTERVIEWING PEOPLE, HIS  
9 TRANSLATOR, INSTEAD OF CARRYING "THOUGHT" ACROSS AS  
10 "THOUGHT" AND "REFORM" ACROSS AS "REFORM," TRANSFORMED  
11 "THOUGHT" INTO "BRAIN" AND "REFORM" INTO "WASHING" SO THAT  
12 THAT TERM GOT INTO THE LANGUAGE AS A MISTRANSLATION AT THAT  
13 POINT IN TIME AND IT CAUGHT ON.

14 THE REASON IT IS NOT USED IN THE TECHNICAL  
15 LITERATURE IS IT IS ONLY REFERRING TO ONE SEGMENT OF THE  
16 THOUGHT REFORM PROGRAM. BUT THE TECHNICAL TERMS ARE  
17 COERCIVE PERSUASION AND THOUGHT REFORM PROGRAMS.

18 Q COULD YOU TELL US WHAT EXIT COUNSELING IS?

19 A YES, SIR. EXIT COUNSELING IS A CONVERSATION  
20 AND INFORMATION PROCEDURE THAT IS NOW PROVIDED BY MANY  
21 EX-MEMBERS OF VARIOUS CULTIC GROUPS. THERE ARE NOW  
22 THOUSANDS OF CULT VETERANS WHO HAVE BEEN IN AND HAVE COME  
23 OUT OF VARIOUS OF THE ORGANIZATIONS.

24 AND THESE EXIT COUNSELORS HAVE STUDIED MUCH OF  
25 THE LITERATURE LIKE I AM TELLING YOU ABOUT ON THOUGHT REFORM  
26 AND COERCIVE PERSUASION, LITERATURE AND INFLUENCE TECHNIQUES  
27 THAT ARE WIDELY USED. AND HAVE THEN -- WHEN THEY DO THEIR  
28 EXIT COUNSELING -- MANY, MANY CLIPPINGS ON THE GROUP THAT A

1 PERSON HAS EXITED FROM OR IS THINKING ABOUT COMING OUT OF.

2 AND THE EXIT COUNSELOR PROVIDES TO SOMEONE WHO  
3 IS THINKING ABOUT COMING BACK OUT OF A CULT ALL KINDS OF  
4 NEWSPAPER AND MAGAZINE CLIPPINGS, CLIPPINGS FROM TELEVISION  
5 PROGRAMS AND NEWS CLIPS SO THAT THE PERSON CAN -- WITHOUT  
6 ANYONE COERCING THEM -- HAVE TIME TO SLEEP, TO EAT, TO READ,  
7 THINK OVER AND TALK WITH THEIR FAMILY, RELATIVES, WHOEVER  
8 THEY WANT TO, ABOUT SOME OF THIS MATERIAL THAT'S USUALLY  
9 BEEN WITHHELD FROM THEM OR DISTORTED BY THE MANAGEMENT WHILE  
10 THEY WERE IN THE CULTIC ORGANIZATION.

11 Q NOW, YOU HAVE TOLD US YOU INTERVIEWED GREGORY  
12 MULL. IN THE COURSE OF YOUR WORK WITH GREGORY MULL, HAVE  
13 YOU COME TO ANY CONCLUSION AS TO WHETHER OR NOT THERE IS ANY  
14 PSYCHOLOGICAL DISORDER DETECTABLE IN MR. MULL'S BEHAVIOR?

15 A YES, SIR.

16 Q COULD YOU TELL US WHAT THAT DISORDER IS?

17 A THE DISORDER THAT I THINK BEST DESCRIBES THE  
18 CONDITION THAT YOU SEE IN HIM PSYCHOLOGICALLY IS CALLED A  
19 POSTTRAUMATIC STRESS DISORDER.

20 Q COULD YOU TELL US A LITTLE BIT ABOUT THAT?

21 A YES, SIR. THIS IS D.S.M. III, THE DIAGNOSTIC  
22 AND STATISTICAL MANUAL III. THIS IS THE BOOK OR THE SET OF  
23 CRITERIA THAT IS USED IN THE UNITED STATES TO CLASSIFY ALL  
24 PSYCHOLOGICAL AND PSYCHIATRIC DISORDERS.

25 AND I FEEL THAT THE BEHAVIOR THAT I SAW IN '82,  
26 '83 AND IN '85 IN MR. MULL SUGGEST THAT HE WAS SUBJECTED TO  
27 THE MANY STRESSES THAT OCCURRED TO HIM WHILE HE WAS WITH  
28 C.U.T. SO THAT HE MEETS THIS FIRST CRITERIA OF HAVING BEEN

1 EXPOSED TO A SEVERE STRESSOR.

2 THE SECOND CRITERIA IS REEXPERIENCING OF THE  
3 TRAUMA, SUCH AS RECURRENT AND INTRUSIVE RECOLLECTIONS OF THE  
4 EVENT. AND MR. MULL'S THINKING IS FILLED WITH THESE  
5 INTRUSIVE RECOLLECTIONS THAT COME IN WITH CONSIDERABLE  
6 ANXIETY AND ANGUISH AND JUST INTRUDE INTO HIS AWARENESS.

7 THE THIRD CRITERIA IS THERE IS SOME NUMBING OF  
8 RESPONSIVENESS OR REDUCED INVOLVEMENT WITH THE EXTERNAL  
9 WORLD. AND HE SURELY HAS SHOWN THAT ALL ALONG. BECAUSE THE  
10 TRAUMA OF WHAT HAPPENED TO HIM WHILE HE WAS IN THE GROUP WAS  
11 SO EXTENSIVE AND SO SEVERE THAT HE'S NEVER REALLY GOTTEN  
12 GOING AGAIN IN LIFE. HE NEVER WAS ABLE TO REALLY GET OUT  
13 AND GET REALLY SEARCHING FOR ESTABLISHING A CAREER AND SO  
14 ON.

15 THE FOURTH CRITERIA THAT HAS TO BE MET -- THE  
16 FIRST WAS THE STRESSOR, THE SECOND REEXPERIENCING, THIRDLY  
17 THIS CONSTRICTED DIMINISHED BEHAVIOR AND THE FORTH IS TO  
18 SHOW ANY OF A NUMBER OF AUTONOMIC AND DYSPHORIC AND  
19 COGNITIVE SYMPTOMS.

20 WHAT THEY MEAN BY THAT IS DOES THIS PERSON  
21 SUFFER FROM ANXIETY? DOES THIS PERSON SUFFER FROM  
22 DEPRESSION? AND DOES THEIR THINKING SHOW SOME CONSTRICTION  
23 AS A RESULT OF THE TRAUMATIC EXPERIENCES THEY HAD?

24 AND IT IS MY PROFESSIONAL OPINION BASED UPON MY  
25 STUDIES OF MR. MULL THAT THE BEHAVIOR THAT HE SHOWS REFLECTS  
26 THAT THIS DISORDER BEST DESCRIBES THE PSYCHOLOGICAL  
27 CONDITION FROM WHICH HE SUFFERS.

28 Q IN YOUR OPINION, IS HIS CONDITION PERMANENT?

1 A YES, SIR. IT IS MY OPINION --

2 Q CAN YOU EXPLAIN TO US BRIEFLY WHY YOU THINK  
3 GREGORY MULL WILL NEVER RETURN TO THE GREGORY MULL HE WAS  
4 BEFORE?

5 MR. KLEIN: I AM GOING TO OBJECT TO THE LAST  
6 QUESTION, YOUR HONOR, IN THAT THERE IS NO FOUNDATION THAT  
7 THIS WITNESS KNOWS WHAT HE WAS BEFORE.

8 THE COURT: SUSTAINED.

9 Q BY MR. LEVY: WOULD YOU EXPLAIN TO US WHY YOU  
10 THINK GREGORY MULL'S CONDITION IS PERMANENT?

11 A YES. MY FEELING IS THAT MR. MULL HAS SUFFERED  
12 PERMANENT AND SEVERE PSYCHOLOGICAL AND SOCIAL DAMAGE AND  
13 THAT HE IS PERMANENTLY PSYCHOLOGICALLY DISABLED AT THIS  
14 POINT.

15 PEOPLE RECOVER MORE EASILY WHEN THEY HAVE BEEN  
16 TRAUMATIZED BY NATURAL DISASTERS -- FLOODS, FIRES, WARS,  
17 DISEASES. BUT THERE IS A SLOWER RECOVERY AND A MORE INTENSE  
18 HARM DONE WHEN THE DISASTERS OR THE STRESSES HAVE BEEN  
19 MAN-MADE AND ESPECIALLY WHEN THEY HAVE BEEN PUT UPON YOU BY  
20 PEOPLE THAT YOU TRUSTED.

21 SO THAT PART OF WHY IT IS GOING TO BE HARD FOR  
22 HIM TO EVER RECOVER IS THAT HIS BASIC TRUST, HIS FAITH, HIS  
23 BELIEF, HIS SELF-CONFIDENCE, HIS BELIEF IN HIMSELF, HIS  
24 BELIEF IN THE GOODNESS OF MANKIND WAS REALLY DAMAGED  
25 SEVERELY BY THE TREATMENT AFFORDED HIM WHILE HE WAS IN THE  
26 GROUP SO THAT HE NOW HAS THIS TREMENDOUS LACK OF  
27 SELF-CONFIDENCE.

28 HE REALLY WAS IN SO MANY WAYS HAD HIS TRUST



1 VIOLATED. AND THEN IN THE END, HE HAD TO FACE  
2 PSYCHOLOGICALLY BEING TREATED AS A DISPOSABLE OBJECT LIKE A  
3 USED EMPTY POP BOTTLE THAT YOU WOULD DISPOSE OF. WHEN THE  
4 GROUP NO LONGER HAD USE FOR HIM, THEY DISPOSED OF HIM BY  
5 SENDING HIM AWAY.

6 AND THE REASON THAT I FEEL THAT THOSE DAMAGES  
7 ARE GOING TO BE PERMANENT, HE'S NEVER BEEN ABLE TO RETURN TO  
8 AN ARCHITECTURAL CAREER. HE SEEMS, ON THOSE TIMES THAT I  
9 HAVE DEALT WITH HIM, TO BE PSYCHOLOGICALLY CRUSHED. HE'S  
10 NEVER BEEN ABLE TO ASSERTIVELY GET GOING IN HIS CAREER.

11 HIS AGE IS AN IMPORTANT THING. HE HAD NOTHING  
12 LEFT WHEN HE WAS DISPOSED OF AT THE END. HIS MONEY WAS  
13 GONE. WHEN HE CAME OUT, HE SAID THAT HE HAD TO GO AND GET  
14 FOOD FROM BEHIND SUPERMARKETS TO FEED HIMSELF AND HIS  
15 DAUGHTER. HIS HOUSE WAS GONE. HIS CAREER WAS GONE. ALL OF  
16 HIS BUSINESS CONTACTS WERE GONE. HIS WIFE AND POSSIBLE  
17 COMPANIONSHIP WAS GONE. HIS REPUTATION HAD BEEN ATTACKED.

18 AND HE HAD REALLY LOST HIS HOPE, HIS TRUST, HIS  
19 BELIEF IN THE GENERAL GOODNESS THAT ALL OF US TRY TO EXPECT  
20 FROM MANKIND BECAUSE HE HAD BEEN SOCIALLY, PSYCHOLOGICALLY,  
21 SPIRITUALLY AND ECONOMICALLY WIPED OUT AT THE TIME THAT HE  
22 WAS SORT OF DISPOSED OF.

23 AND HE HAD BEEN, ONCE AGAIN RETURNING TO MY  
24 DIAGNOSIS, SUBJECTED TO A SERIES OF STRESSES. THEY HAD BEEN  
25 CONTINUING. HE HAD THOSE STRESSES WHILE HE WAS IN. THE  
26 LONG WORK HOURS, OFTEN SLEEPING ON THE FLOOR OR UNDER HIS  
27 DRAWING BENCH.

28 HE THEN HAD TO DEAL WITH THAT TRAUMA OF

1 REALIZING THAT HE HAD BEEN USED BY THE GROUP, THAT HE HAD  
2 BEEN DECEIVED AND SO ON. AND HE HAD TO DEAL WITH THE TRAUMA  
3 OF FEELING THAT HE HAD BEEN USED UP AND THAT HE WAS DISPOSED  
4 BY THEM WHEN HE WAS USED UP.

5 HE THEN, AFTER LEAVING THE GROUP -- WELL, HE  
6 HAD HARASSMENT TO SIGN THINGS AND HE HAD TO DEAL WITH THOSE  
7 STRESSES WHILE HE WAS IN. HE HAD SUBSEQUENT HARASSMENTS  
8 AFTER HE LEFT AND FINALLY HE'S HAD THE PHYSIOLOGICAL CHANGES  
9 FROM THE STROKE AND PHYSICAL CONDITIONS.

10 SO THAT MY TESTIMONY IS FOCUSED ON HIS  
11 PSYCHOLOGICAL ASPECTS AND I FEEL THAT DAMAGE IS PERMANENT  
12 AND SEVERE.

13 MR. LEVY: THANK YOU, MA'AM.

14 I HAVE NOTHING FURTHER FOR THIS WITNESS AT THIS  
15 TIME, YOUR HONOR.

16 THE COURT: WE WILL RESUME AT 1:30. I WANT TO SEE  
17 COUNSEL FOR JUST A MOMENT. REMEMBER THE COURT'S  
18 ADMONITIONS.

19 (A CONFERENCE WAS HELD AT THE BENCH  
20 WHICH WAS NOT REPORTED.)

21 (AT 11:54 A.M., A RECESS WAS TAKEN UNTIL  
22 1:30 P.M. OF THE SAME DAY.)  
23  
24  
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28

1 LOS ANGELES, CALIFORNIA; WEDNESDAY, FEBRUARY 26, 1986

2 1:38 P.M.

3 DEPARTMENT NO. 50 HON. ALFRED L. MARGOLIS, JUDGE  
4 (APPEARANCES AS NOTED ON TITLE PAGE.)  
5

6 MARGARET T. SINGER,

7 RESUMED THE STAND AND TESTIFIED FURTHER AS FOLLOWS:

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

11 THE WITNESS: MARGARET T. SINGER.

12 THE CLERK: THANK YOU.

13 THE COURT: PLEASE PROCEED.

14 MR. KLEIN: THANK YOU, YOUR HONOR.

15 MR. MIDDLETON: YOUR HONOR, BEFORE WE PROCEED, I  
16 WOULD LIKE TO EXTEND AN APOLOGY TO MR. KLEIN, THE COURT AND  
17 THE JURY. THERE WAS A POINT IN THE DEPOSITION THAT MR.  
18 KLEIN, ON CROSS-EXAMINATION OF MRS. LEVY, HAD REFERRED TO A  
19 SECTION. AND I OBJECTED ON THE GROUNDS THAT I THOUGHT HE  
20 WAS READING IT OUT OF CONTEXT AND THERE WERE OTHER AREAS.

21 HE WAS NOT READING IT OUT OF CONTEXT. WHAT HE  
22 WAS DOING WAS ENTIRELY ACCURATE AND I WISH TO EXTEND AN  
23 APOLOGY AT THIS TIME FOR ANY MISLEADING THAT I MIGHT HAVE  
24 DONE.

25 THANK YOU.

26 THE COURT: THANK YOU.

27 MR. KLEIN: THANK YOU.

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## CROSS-EXAMINATION

BY MR. KLEIN:

Q GOOD AFTERNOON.

A HOW DO YOU DO.

Q DOES THE WORD "CULT" HAVE A NEGATIVE  
CONNOTATION FOR YOU?

A NO, SIR.

Q IS IT TRUE THAT HISTORICALLY, MANY RELIGIONS  
HAVE BEEN REFERRED TO AS CULTS?

A YES, SIR. AT THEIR BEGINNING.

Q AT THEIR BEGINNING. AND THEN AS YEARS PASSED,  
THEY MIGHT HAVE NOT -- NO LONGER BEEN REFERRED TO AS CULTS;  
IS THAT TRUE?A THAT'S RIGHT. AND THE TERM "CULT" IS NOT  
LIMITED IN ITS APPLICATION TO DESCRIBING THE STRUCTURAL  
PROPERTIES OF ONLY OF RELIGIOUS ORGANIZATIONS. IT IS  
APPLIED TO OTHER TYPES OF ORGANIZATIONS AS WELL.

Q WHAT IS YOUR FEE FOR TESTIFYING IN THIS CASE?

A ONE DOES NOT CHARGE FOR TESTIMONY.

Q ARE YOU RECEIVING A FEE FOR APPEARING AS AN  
EXPERT?A I WILL SUBMIT A BILL FOR THE TIME EXPENDED IN  
PREPARING AND COMING HERE.Q AND IS THERE A CERTAIN HOURLY RATE THAT YOU  
CHARGE FOR THE WORK YOU DID BEFORE YOU ACTUALLY CAME TO  
COURT TO TESTIFY?

A YES, SIR.

Q AND WHAT IS THAT RATE?

1 A I CHARGE A STANDARD FEE OF \$125 AN HOUR.

2 Q AND DO YOU HAVE A DIFFERENT RATE FOR ACTUALLY  
3 TESTIFYING IN COURT?

4 A I ASK AS A STANDARD FEE FOR DEPOSITION TIME AND  
5 COURT TIME \$250 AN HOUR.

6 Q HOW MANY TIMES HAVE YOU BEEN RETAINED AS AN  
7 EXPERT IN A COURT CASE WHERE THE OTHER PARTY, PARTY AGAINST  
8 WHOM YOU WERE TESTIFYING, WAS AN ALTERNATIVE CHURCH OR A NEW  
9 AGE RELIGION?

10 A I'M NOT SURE.

11 Q MORE THAN TEN TIMES?

12 A NO, NO.

13 THE COURT: CAN YOU APPROXIMATE?

14 THE WITNESS: YES. LET ME HAVE TIME.

15 MAYBE SIX TIMES.

16 Q BY MR. KLEIN: HAVE YOU TESTIFIED SIX TIMES IN  
17 COURT ON SIX DIFFERENT CASES?

18 A YES, SIR. THAT WAS WHAT YOUR REQUEST WAS AND I  
19 COUNTED TO THE BEST OF MY MEMORY.

20 Q AND IN PREPARING FOR THOSE OTHER -- WITHDRAWN.  
21 AMONG THOSE SIX, ARE YOU COUNTING THIS CASE?

22 A NO, SIR. THIS WOULD BE SEVEN ON THAT LIST.

23 Q AND DO YOU HAVE ANY OTHER CASES WHERE YOU HAVE  
24 NOT YET APPEARED IN COURT, BUT YOU HAVE BEEN RETAINED AS AN  
25 EXPERT AND REASONABLY EXPECT TO BE APPEARING IN COURT?

26 A YES.

27 Q CASES INVOLVING NEW AGE RELIGIONS I AM TALKING  
28 ABOUT.

1 A YES.

2 Q HOW MANY FALL INTO THAT CATEGORY? YOU HAVEN'T  
3 YET TESTIFIED IN COURT, BUT YOU HAVE BEEN RETAINED AS AN  
4 EXPERT AND YOU EXPECT TO TESTIFY IN COURT.

5 A ONE.

6 Q NOW, IN THE SIX OTHER CASES WHERE YOU'VE BEEN  
7 RETAINED AS AN EXPERT AND HAVE APPEARED IN COURT, HAVE YOU  
8 EVER ADDED UP THE NUMBER OF HOURS THAT YOU SPENT PREPARING  
9 FOR YOUR TESTIMONY IN COURT, \$125 AN HOUR FEE, HOW MANY  
10 HOURS YOU ACTUALLY HAD?

11 MR. LEVY: I AM GOING TO OBJECT TO THIS, YOUR HONOR,  
12 AS CUMULATIVE, SELF-SERVING AND LACKING IN RELEVANCE TO THIS  
13 CASE.

14 THE COURT: SUSTAINED.

15 MR. KLEIN: YOUR HONOR, MAY I BE HEARD ON THAT?

16 THE COURT: LET'S PROCEED, PLEASE.

17 MR. KLEIN: I HAVE A NUMBER OF QUESTIONS ON THAT  
18 POINT. I JUST WOULD LIKE TO BE HEARD ON IT IF I CAN'T ASK  
19 ANYMORE ON THAT POINT.

20 THE COURT: ALL RIGHT.

21 (THE FOLLOWING PROCEEDINGS WERE HELD

22 AT THE BENCH:)

23 MR. KLEIN: IT IS MY UNDERSTANDING THAT AT THE RATES  
24 THIS WITNESS CHARGES, SHE'S MADE MANY THOUSANDS OF DOLLARS  
25 TESTIFYING IN THESE CASES, ALWAYS AGAINST NEW AGE RELIGIONS,  
26 TO THE EXTENT SHE'S MADE TWENTY-, THIRTY THOUSAND DOLLARS  
27 DOING IT. I THINK THAT IS A BIAS AND IT CAN BE BROUGHT OUT  
28 TO THE JURY.

1 THE COURT: THE OBJECTION IS SUSTAINED.

2 MR. KLEIN: OKAY.

3 THE COURT: IT IS IRRELEVANT. YOU'VE BROUGHT OUT THE  
4 NUMBER OF CASES. IT IS NOT A GREAT NUMBER OF CASES. SHE  
5 APPARENTLY CHARGES A STANDARD FEE WHICH IS NOT SHOCKING.  
6 SHE IS HIGHLY QUALIFIED IN HER FIELD. SHE HAS NO STAKE IN  
7 THE OUTCOME OF THIS CASE.

8 LET'S PROCEED AND NOT GET BOGGED DOWN ON  
9 IRRELEVANCIES SUCH AS THIS.

10 (THE PROCEEDINGS WERE RESUMED IN OPEN  
11 COURT IN THE PRESENCE OF THE JURY.)

12 Q BY MR. KLEIN: WOULD YOUR ANSWER ON THE NUMBER  
13 OF CASES YOU HAVE BEEN INVOLVED IN WHERE NEW AGE OR  
14 ALTERNATIVE RELIGION WAS THE OTHER PARTY, WOULD THAT ANSWER  
15 BE ANY DIFFERENT IF I JUST SAID HOW MANY CASES WERE YOU  
16 INVOLVED IN WHERE A RELIGIOUS ORGANIZATION WAS THE OTHER  
17 PARTY?

18 MR. LEVY: SAME OBJECTION, YOUR HONOR. AND I WILL  
19 ADD THAT IT IS A COMPOUND, AND VAGUE AND AMBIGUOUS, AND  
20 UNUNDERSTANDABLE QUESTION.

21 THE COURT: SUSTAINED.

22 Q BY MR. KLEIN: MY QUESTION IS HAVE YOU BEEN  
23 INVOLVED -- HAVE YOU TESTIFIED IN ANY CASES, IN ADDITION TO  
24 THE SEVEN YOU'VE MENTIONED, WHERE A CHURCH WAS INVOLVED  
25 REGARDLESS OF WHETHER YOU CALL IT A NEW AGE CHURCH OR NEW  
26 RELIGION CHURCH OR ANYTHING ELSE?

27 A NOT THAT I CAN --

28 MR. LEVY: OBJECTION, YOUR HONOR. RELEVANCE.

1296

1 THE COURT: SHE CAN ANSWER AND THEN LET'S GET ON TO  
2 SOMETHING ELSE.

3 MR. KLEIN: YES, YOUR HONOR.

4 THE WITNESS: THE ANSWER IS NOT THAT I CAN RECALL.

5 Q BY MR. KLEIN: YOUR NOTES SAY THAT YOU  
6 INTERVIEWED GREGORY MULL ON THREE SEPARATE OCCASIONS IN  
7 1982, '83 AND '85 FOR A TOTAL OF TEN HOURS?

8 A YES.

9 Q DO YOU KNOW HOW MANY HOURS YOU INTERVIEWED HIM  
10 WHEN YOU INTERVIEWED HIM IN 1982?

11 A TWO.

12 Q AND WHEN YOU INTERVIEWED HIM IN 1983, HOW MANY  
13 HOURS?

14 A THREE.

15 Q AND I THINK IT YOU INTERVIEWED HIM FOR FIVE  
16 HOURS IN 1985?

17 A YES.

18 Q AT WHAT POINT IN THOSE INTERVIEWS -- AFTER THE  
19 FIRST, AFTER THE SECOND OR WAS IT AFTER THE THIRD -- WAS IT  
20 WHEN YOU CONCLUDED THAT GREGORY MULL HAD BEEN THE VICTIM OF  
21 COERCIVE PERSUASION?

22 A I DIDN'T FORM THAT OPINION UNTIL I HAD FULLY  
23 INTERVIEWED HIM FOR THE TEN HOURS.

24 Q SO YOU FORMED IT IN 1985?

25 A YES, SIR.

26 Q DO YOU RECALL WHAT MONTH IN 1985 YOU  
27 INTERVIEWED HIM?

28 A NO, SIR.



1 Q NOW, WHEN YOU INTERVIEWED HIM FOR THOSE TEN  
2 HOURS, DID YOU TAKE ANY NOTES OF THE INTERVIEWS?

3 A I DON'T BELIEVE I DID. I MAY HAVE.

4 Q DID YOU REVIEW ANY NOTES OF INTERVIEWS OF  
5 GREGORY MULL PRIOR TO TESTIFYING IN THIS CASE?

6 A YES. SO THAT I DID TAKE NOTES, BUT I DIDN'T  
7 BRING THEM WITH ME.

8 Q DID YOU REVIEW THEM WITH THE PURPOSE OF  
9 REFRESHING YOUR RECOLLECTION SO THAT YOU COULD TESTIFY  
10 TODAY?

11 A YES, SIR. I MOSTLY REVIEWED THEM TO GET THE  
12 SEQUENCE OF YEARS OF EVENTS IN LINE.

13 MR. KLEIN: YOUR HONOR, I WOULD ASK TO SEE THOSE  
14 NOTES.

15 THANK YOU.

16 MAYBE WE SHOULD MARK THIS DOCUMENT FOR  
17 IDENTIFICATION. I BELIEVE THE NEXT NUMBER IS 107?

18 MR. LEVY: WE MIGHT BE HIGHER.

19 MR. KLEIN: WE MIGHT BE PAST THAT.

20 THE COURT: NEXT NUMBER IS 109.

21 MR. KLEIN: 109. THANK YOU, YOUR HONOR.

22 Q NOW, THIS DOCUMENT WHICH WE HAVE MARKED 109 FOR  
23 IDENTIFICATION IS ABOUT -- PENCILLED WRITING ABOUT THREE  
24 QUARTERS OF THE PAGE WHICH YOU HAVE JUST HANDED ME. ARE  
25 THESE YOUR ONLY NOTES OF THE TEN HOURS THAT YOU INTERVIEWED  
26 GREGORY MULL?

27 A I DON'T THINK SO. I THINK I HAVE NOTES.

28 Q AND IF YOU HAVE OTHER NOTES, I TAKE IT THEY ARE

1 NOT WITH YOU?

2 A THEY ARE NOT WITH ME.

3 Q THESE OTHER NOTES THAT YOU HAVE, DID YOU REVIEW  
4 THEM TO REFRESH YOUR RECOLLECTION OF WHAT HE SAID IN ORDER  
5 TO PREPARE YOURSELF TO TESTIFY TODAY?

6 A I THINK I JUST LOOKED THROUGH THEM TO GET THE  
7 SEQUENCE OF EVENTS THAT ARE LISTED ON THAT PAGE.

8 Q I SEE. NOW, WHEN --

9 A BECAUSE THE REST I HAVE IN MIND.

10 Q WHEN YOU SAY, "THE SEQUENCE OF EVENTS," WHAT  
11 YOU HAVE ON THIS PAGE IS SIMPLY, "HIGH SCHOOL GRADUATION  
12 1941, BORN 1921," AND YOU SORT OF JUST GO DOWN WITH EVENTS  
13 IN HIS LIFE SUCH AS, "WENT TO CAMELOT JANUARY OF '79." IS  
14 THAT GENERALLY THE NATURE OF THE NOTES THAT YOU ARE  
15 REFERRING TO?

16 A YES, SIR.

17 Q THEY ARE NOT SUBSTANTIVE NOTES WHERE HE TOLD  
18 YOU, "AND THIS HAPPENED TO ME IN THE CHURCH," OR, "THIS  
19 PERSON SAID THIS TO ME"? IT IS NOT THAT KIND OF NOTES THAT  
20 YOU TOOK; IS THAT RIGHT?

21 A NO, SIR. THEY ARE FOR GETTING A SEQUENCE OF  
22 YEARS AND DATES.

23 Q WAS THERE A PARTICULAR REASON THAT IN THE TEN  
24 HOURS YOU INTERVIEWED HIM, YOU DIDN'T TAKE DETAILED NOTES ON  
25 WHAT HE WAS TELLING YOU WITH RESPECT TO PARTICULAR THINGS  
26 THAT HAPPENED TO HIM IN THE CHURCH AND PARTICULAR THINGS  
27 PEOPLE SAID TO HIM?

28 A I HAVE A PRETTY GOOD RECALL OF WHAT HE DID TELL

1 ME.

2 Q AND YOU CAN RECALL THE THINGS HE TOLD YOU IN  
3 1982?

4 A YES, SIR.

5 Q ARE YOU -- WITHDRAWN.

6 DID YOU EVER SEE MR. MULL FOR TREATMENT  
7 PURPOSES OR WAS IT MERELY IN RELATION TO YOU BEING AN EXPERT  
8 WITNESS AT THIS TRIAL?

9 A IT WAS THE LATTER.

10 Q NOW, YOU SAID THAT YOU REACHED YOUR CONCLUSION  
11 THAT CHURCH UNIVERSAL WAS USING A THOUGHT REFORM PROGRAM  
12 AFTER THE 1985 INTERVIEW; IS THAT CORRECT?

13 A THAT WASN'T YOUR PRIOR QUESTION.

14 Q OKAY. THEN I WILL ASK THAT JUST TO CLARIFY IT.

15 AT WHAT POINT DID YOU REACH YOUR CONCLUSION  
16 THAT CHURCH UNIVERSAL AND TRIUMPHANT WAS UTILIZING A THOUGHT  
17 REFORM PROGRAM WITH RESPECT TO YOUR INTERVIEWS WITH MR.  
18 MULL?

19 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR  
20 HONOR. NOW IT HAS BECOME A COMPOUND QUESTION, IT IS VAGUE  
21 AND AMBIGUOUS.

22 THE COURT: PLEASE REPHRASE IT.

23 Q BY MR. KLEIN: AFTER YOU INTERVIEWED MR. MULL  
24 IN 1982, DID YOU REACH ANY CONCLUSION WITH RESPECT TO  
25 WHETHER CHURCH UNIVERSAL AND TRIUMPHANT WAS OPERATING A  
26 THOUGHT REFORM PROGRAM WITH RESPECT TO MR. MULL?

27 A WOULD YOU READ ME THE FIRST PART?

28 MR. KLEIN: YOUR HONOR, MAY THE FIRST PART BE READ

1 BACK?

2 THE COURT: ALL RIGHT:

3 (THE QUESTION WAS READ.)

4 THE WITNESS: YES.

5 Q BY MR. KLEIN: WHAT CONCLUSION DID YOU REACH AT  
6 THAT TIME?

7 A I TENTATIVELY CONCLUDED THAT WHAT HE HAD  
8 DESCRIBED TO ME SUGGESTED THAT CHURCH UNIVERSAL AND  
9 TRIUMPHANT WAS CONDUCTING A THOUGHT REFORM PROGRAM.

10 Q AT THAT TIME IN 1982, DID YOU REACH ANY  
11 CONCLUSION AS TO WHETHER HE WAS THE VICTIM OF COERCIVE  
12 PERSUASION?

13 A I HAD THE FEELING THAT -- I WAS STARTING TO GET  
14 FROM HIM THE HISTORY OF HIS EXPERIENCES AND THAT THOSE  
15 EXPERIENCES WERE ONES IN WHICH COERCIVE PERSUASION HAD  
16 OCCURRED WITHIN THE CONTEXT OF A THOUGHT REFORM PROGRAM.

17 Q YOU SAY YOU STARTED TO GET THE FEELING. DID  
18 YOU REACH ANY CONCLUSION AFTER THAT 1982 INTERVIEW?

19 A I THINK I DID, YES, SIR.

20 Q NOW, THEN YOU INTERVIEWED HIM IN 1983.

21 A YES, SIR.

22 Q AT THAT TIME, DID YOU HAVE AN OPINION THAT WAS  
23 ANY DIFFERENT AS TO WHETHER CHURCH UNIVERSAL AND TRIUMPHANT  
24 WAS OPERATING A THOUGHT REFORM PROGRAM WITH RESPECT TO MR.  
25 MULL?

26 A YES, SIR, I DID BECAUSE HE PROVIDED ME MORE  
27 DETAILS OF HIS EXPERIENCE AND IT CONFIRMED MY OPINION THAT I  
28 HAD ALREADY PARTIALLY FORMED.

1303

1 Q WAS THERE ANY REASON THAT YOU KNOW OF WHY THE  
2 DETAILS HE PROVIDED YOU IN 1983 WERE NOT PROVIDED TO YOU IN  
3 1982?

4 A YES.

5 Q WHAT WAS THAT?

6 A I ONLY HAD TIME TO PUT IN TWO HOURS WITH HIM IN  
7 1982.

8 Q AND AFTER YOU CONCLUDED THE INTERVIEWS IN 1983  
9 WITH MR. MULL, WERE YOUR OPINIONS TENTATIVE OR WERE THEY  
10 CONCLUSIVE AS TO WHETHER CHURCH UNIVERSAL AND TRIUMPHANT WAS  
11 OPERATING A THOUGHT REFORM SYSTEM?

12 A I FEEL THAT THEY WERE STILL TENTATIVE.

13 Q AND AS FAR AS WHETHER HE WAS COERCIVELY  
14 PERSUADED, WHEN YOU FINISHED YOUR INTERVIEWS IN 1983, WERE  
15 YOUR OPINIONS TENTATIVE OR WERE THEY FINAL AS TO WHETHER HE  
16 HAD BEEN COERCIVELY PERSUADED?

17 A THEY WERE TENTATIVE.

18 Q THEN CAME FIVE HOURS IN 1985; IS THAT CORRECT?  
19 YOU THEN INTERVIEWED HIM FOR FIVE HOURS IN 1985?

20 A YES.

21 Q AND AFTER THOSE INTERVIEWS, DID YOUR OPINIONS  
22 AS FAR AS THOUGHT REFORM AND COERCIVE PERSUASION, DID THEY  
23 BECOME FINAL AT THAT TIME?

24 A YES, SIR. IN COLLABORATION WITH THE OTHER  
25 STUDIES THAT I HAD BEEN DOING AS WELL AS INTERVIEWING HIM.

26 Q WHEN YOU SAY, "OTHER STUDIES," ARE YOU  
27 REFERRING TO THE OTHER INFORMATION YOU READ US ON THAT LIST  
28 OF THE PEOPLE THAT HAVE BEEN INTERVIEWED AND DOCUMENTS THAT

1 YOU HAD READ?

2 A YES, SIR.

3 Q NOW, AS FAR AS THE PEOPLE THAT YOU INTERVIEWED,  
4 WHO CHOSE THOSE PEOPLE?

5 A WELL, MR. MULL APPROACHED ME HIMSELF. ANN  
6 TROWBRIDGE WAS A PERSON THAT MR. MULL SUGGESTED THAT I MIGHT  
7 TALK WITH, AS WAS HER HUSBAND. THE NEXT PERSON CALLED ME ON  
8 THE PHONE AT THE INSTIGATION OF HER FAMILY. AND WHEN I  
9 SPELLED OUT TO HER THAT WE NEEDED TO DECIDE WAS SHE TALKING  
10 WITH ME SO THAT I COULD USE THE MATERIAL OPENLY OR WAS SHE  
11 COMING TO ME FOR THERAPY, SHE SAID IT COULD BE USED OPENLY.  
12 THAT WAS MRS. PAT BROWN.

13 MR. PURCELL WAS REFERRED TO ME BY ANOTHER  
14 PARTY. AND MRS. KATHLEEN LEVY I ASKED TO TALK WITH BECAUSE  
15 SHE HAD BEEN HIS THERAPIST.

16 Q AM I CORRECT THAT ALL OF THE PEOPLE THAT YOU  
17 SPOKE TO THAT YOU ACTUALLY INTERVIEWED WERE PEOPLE WHO WERE  
18 EX-CHURCH MEMBERS?

19 A YES, SIR.

20 Q YOU MENTIONED PEOPLE FOR TELEPHONE INTERVIEWS.  
21 THAT IS ON YOUR LIST. DID YOU CONDUCT THOSE TELEPHONE  
22 INTERVIEWS?

23 A I CONDUCTED THE ONE WITH MR. PAVUK AND MR.  
24 KING.

25 Q AND ---

26 A AND THE OTHERS WERE CONDUCTED BY SOMEONE ELSE.

27 Q AND THEN DID YOU JUST READ THEIR NOTES OF THE  
28 INTERVIEW?

1305

1 A I READ THEIR NOTES FROM A TAPED INTERVIEW.

2 Q THE INTERVIEW, THE TELEPHONE INTERVIEW WAS  
3 TAPED?

4 A YES, SIR.

5 Q DID YOU LISTEN TO THE TAPE OF THOSE INTERVIEWS?

6 A NO, SIR.

7 Q YOU JUST READ THE NOTES OF WHAT WHOEVER  
8 CONDUCTED THE INTERVIEW CHOSE TO WRITE DOWN?

9 A THEY WERE EXCERPTS RATHER THAN, I THINK,  
10 CHOOSING TO WRITE DOWN. THEY WERE TAKEN FROM THE TAPE.

11 Q RIGHT. BUT SOMEBODY MADE A DECISION AS TO WHAT  
12 TO TAKE FROM THE TAPE AND WHAT NOT TO TAKE FROM THE TAPE;  
13 ISN'T THAT TRUE?

14 A YES, SIR.

15 Q AND THEY DECIDED WHATEVER THEY WANTED TO TAKE,  
16 THEY WROTE THOSE DOWN AND THAT IS WHAT YOU READ?

17 A SOMEONE TRANSCRIBED IT OFF THE TYPE.

18 Q BUT YOU DON'T KNOW WHAT ELSE WAS ON THAT TAPE  
19 THAT WAS NOT TRANSCRIBED; ISN'T THAT RIGHT?

20 A NO, SIR. I INQUIRED AS TO WHAT ELSE WAS ON THE  
21 TAPE TO FIND OUT THE GENERAL PIECES THAT WERE NOT ON THE  
22 TRANSCRIPTS I READ.

23 Q BUT YOU NEVER ACTUALLY LISTENED TO THE TAPE?

24 A NO, SIR.

25 Q NOW, AS FAR AS THE INTERVIEWS, THE ONE, TWO,  
26 THREE, FOUR, FIVE PERSONAL INTERVIEWS, DID YOU CONDUCT ALL  
27 THOSE?

28 A YES, SIR.

1 Q WAS THERE ANY REASON THAT THE PERSONAL  
2 INTERVIEWS WERE CONDUCTED WITH EX-CHURCH MEMBERS AND NOT ANY  
3 CHURCH MEMBERS?

4 A YES, SIR.

5 Q WHAT WAS THAT REASON?

6 A BECAUSE I WANTED TO GET A SAMPLING OF PEOPLE  
7 WHO WERE AVAILABLE AND WHO COULD DESCRIBE THEIR EXPERIENCES  
8 TO ME FREELY.

9 Q AND DID YOU MAKE THE ASSUMPTION THAT IF A  
10 PERSON IS A CHURCH MEMBER, THEY COULDN'T DESCRIBE THEIR  
11 EXPERIENCES TO YOU FREELY?

12 A I HAD TO MAKE A LIMITED ASSUMPTION OF THAT KIND  
13 BASED UPON WHAT I ALREADY KNEW ABOUT THE ORGANIZATION AND  
14 OTHER SIMILAR TYPES OF ORGANIZATIONS.

15 Q SO AM I CORRECT THOUGH THAT YOU NEVER, FOR  
16 EXAMPLE, TRIED TO CONTACT THE ORGANIZATION AND SAY -- AND  
17 ASK THEM IF YOU COULD INTERVIEW MEMBERS? YOU NEVER DID  
18 THAT, DID YOU?

19 A NO, SIR.

20 Q THE EX-MEMBERS THAT YOU INTERVIEWED, WOULD IT  
21 BE FAIR TO SAY THAT THEY WERE -- THEY DID NOT CONSIDER  
22 THEMSELVES TO BE ON GOOD TERMS WITH THE CHURCH AT THE TIME  
23 YOU INTERVIEWED THEM?

24 A I NEVER INQUIRED ABOUT HOW THEY VIEWED  
25 THEMSELVES IN RELATION TO THE CHURCH, EXCEPT THAT MR. MULL I  
26 KNEW HAD STARTED A LEGAL SUIT AGAINST THE CHURCH.

27 Q AND ONE OF THE OTHERS, MR. PURCELL, ALSO HAD;  
28 ISN'T THAT CORRECT?



1 A YES, SIR.

2 Q AND MR. AND MRS. TROWBRIDGE -- YOU KNEW MR.  
3 TROWBRIDGE WAS GOING TO BE A WITNESS IN THIS CASE, DIDN'T  
4 YOU?

5 A NOT AT THE TIME I INTERVIEWED HIM.

6 Q NOW, WOULD IT HAVE ENHANCED THE VALUE OF YOUR  
7 RESEARCH AND THE VALIDITY OF YOUR RESEARCH FOR YOU TO HAVE  
8 INTERVIEWED SOME ACTUAL CHURCH MEMBERS, CURRENT CHURCH  
9 MEMBERS?

10 MR. LEVY: OBJECTION, YOUR HONOR. CALLS FOR  
11 SPECULATION.

12 THE COURT: SHE CAN ANSWER.

13 THE WITNESS: IT WOULD HAVE BEEN INTERESTING AND  
14 HELPFUL BECAUSE ALL INFORMATION THAT YOU GET AND ALL PEOPLE  
15 THAT YOU CAN INTERVIEW FROM ANY GROUP CAN BE OF ASSISTANCE  
16 TO YOU.

17 Q BY MR. KLEIN: DO YOU KNOW WHAT THE TOTAL  
18 MEMBERSHIP OF THE CHURCH IS?

19 A NO, SIR. THERE ARE MANY ESTIMATES THAT VARY.

20 Q WOULD YOU -- WITHDRAWN.

21 YOU PERSONALLY INTERVIEWED FIVE PEOPLE, TWO OF  
22 WHOM HAVE LAWSUITS AGAINST THE CHURCH. DO YOU THINK THAT  
23 FIVE INTERVIEWS, FIVE PEOPLE IS AN ADEQUATE SAMPLE IN ORDER  
24 TO REACH THE CONCLUSIONS YOU'VE REACHED?

25 A YES, SIR, BECAUSE IT WAS AN ADEQUATE SAMPLE FOR  
26 WHAT I NEEDED TO LEARN AND FOR THE AREAS INTO WHICH I WISHED  
27 TO EXPLORE.

28 AND I AM NOT SURE THAT MR. PURCELL STILL HAS A

1 LEGAL CASE AGAINST THE CHURCH. I WANTED TO CLEAR UP THAT  
2 STATEMENT.

3 Q DID YOU EVER MAKE AN ATTEMPT TO CONTACT  
4 ELIZABETH CLARE PROPHET AND SEE IF SHE WOULD TALK TO YOU?

5 A NO, SIR.

6 Q ANY PARTICULAR REASON WHY NOT?

7 A I HAD A FEELING THAT SINCE THE CASE OF MR. MULL  
8 HAD ALREADY BEEN INSTIGATED, THAT ONE DID NOT TALK TO PEOPLE  
9 ON THE OTHER SIDE OF A LEGAL CASE, THAT THAT JUST WAS NOT  
10 DONE.

11 Q WHEN WAS THE FIRST TIME THAT YOU BEGAN STUDYING  
12 CHURCH UNIVERSAL AND TRIUMPHANT?

13 A PERHAPS 1979, IT MAY HAVE BEEN A LITTLE BIT  
14 EARLIER, WHEN I FIRST HAD SOME CLIENTS COME TO ME.

15 Q AND 1979 WAS PRIOR TO MR. MULL'S LAWSUIT WHICH  
16 WAS FILED IN APPROXIMATELY 1981. BETWEEN 1979 AND 1981, DID  
17 YOU MAKE ANY ATTEMPT TO CONTACT ELIZABETH CLARE PROPHET AND  
18 HEAR HER SIDE OF THE STORY, WHAT SHE HAD TO SAY?

19 A NO, SIR, BECAUSE I WAS SEEING PEOPLE IN THERAPY  
20 WHO WERE BRINGING THEIR CONDITIONS THAT THEY FELT WERE  
21 RELATED TO THEIR TIME WITH THE GROUP TO ME. AND IT WAS A  
22 DIFFERENT TYPE OF RELATIONSHIP.

23 Q I TAKE IT YOU HAVE NEVER BEEN TO CAMELOT?

24 A NO, SIR.

25 Q AM I ALSO TO ASSUME YOU HAVE NEVER BEEN TO A  
26 CHURCH SERVICE WHERE PEOPLE WERE DECREERING?

27 A I HAVE SAMPLED, AS YOU NOTICED ON THE THING --  
28 I MUST SAY NO, I HAVE NEVER BEEN TO A SERVICE, BUT I HAVE

1 SAMPLED SOME 50 TAPES AND SEEN SOME TELEVISION EXCERPTS.  
2 BUT I HAVE NOT ATTENDED ONE OF THEIR SERVICES.

3 Q DID YOU MAKE NOTES WHEN YOU INTERVIEWED THE  
4 OTHER PEOPLE WHOM YOU INTERVIEWED?

5 A YES, SIR.

6 Q AND DID YOU REVIEW THOSE NOTES -- LET ME  
7 WITHDRAW THAT.

8 WERE THOSE NOTES OF A SIMILAR TYPE TO WHAT WE  
9 HAVE ON THE DOCUMENT WE HAVE MARKED 109 FOR IDENTIFICATION,  
10 WHICH ARE CHRONOLOGICAL-TYPE NOTES?

11 A NO, SIR.

12 Q THE BIRTHDAY AND THE HIGH SCHOOL GRADUATION?

13 A THE ANSWER IS NO, SIR.

14 Q DID YOU REVIEW ANY OF THOSE OTHER NOTES IN  
15 PREPARATION FOR YOUR TESTIMONY TODAY?

16 A YES, SIR.

17 MR. KLEIN: YOUR HONOR, I WOULD ASK FOR THOSE NOTES.  
18 IF SHE REVIEWED THEM IN PREPARATION OF HER TESTIMONY HERE  
19 TODAY, YOUR HONOR --

20 THE COURT: I DON'T WANT TO HEAR ANY ARGUMENT. IF I  
21 WANT AN EXPLANATION, I WILL ASK FOR IT. APPROACH THE BENCH  
22 FOR A MINUTE.

23 (THE FOLLOWING PROCEEDINGS WERE HELD

24 AT THE BENCH:)

25 THE COURT: DO YOU WANT TO BE HEARD?

26 MR. LEVY: I THINK MR. KLEIN HAS HAD AN ADEQUATE  
27 OPPORTUNITY TO SUBPOENA WHATEVER HE WANTED TO. HE KNEW WHO  
28 OUR EXPERT WITNESSES WERE. I THINK THE TIME IS WELL PASSED

1 THAT HE COULD HAVE --

2 THE COURT: IT IS NOT TRUE THAT ANYTHING A PERSON  
3 LOOKS AT IS AVAILABLE TO YOU. SOMETIMES PEOPLE LOOK AT  
4 CERTAIN DATA TO REFRESH THEIR RECOLLECTION. IT IS NOT TRUE  
5 THAT EVERY BOOK, EVERY DOCUMENT, EVERYTHING THAT ONE TALKS  
6 ABOUT FROM THE WITNESS STAND OR MIGHT HAVE LOOKED AT IS  
7 AVAILABLE FOR THE OTHER SIDE TO LOOK AT.

8 LET'S PROCEED.

9 (THE PROCEEDINGS WERE RESUMED IN OPEN  
10 COURT IN THE PRESENCE OF THE JURY.)

11 Q BY MR. KLEIN: IN LOOKING AT YOUR NOTES, THERE  
12 IS A STATEMENT ABOUT MOVIES, BOOKS, TELEPHONES. THAT I  
13 THINK UNDER YOUR SECTION "TOTALISTIC," IT SAYS, "READING,  
14 MOVIES, TELEPHONE." WHAT WAS THE REFERENCE --

15 A I WOULD LIKE TO SEE THE PAGE SO WE CAN KEEP THE  
16 CONTEXT GOING.

17 Q SURE.

18 A AND WHAT IS YOUR QUESTION, SIR?

19 Q IT MENTIONS MOVIES, TV, RADIO, BOOKS UNDER  
20 "TOTALISTIC." I WAS WONDERING WHAT THE REFERENCE WAS TO  
21 THOSE AS FAR AS CHURCH UNIVERSAL AND TRIUMPHANT?

22 A THE REFERENCE TO THOSE WAS FOR ME TO LIST THEM  
23 HERE AS MEMORY AIDS FOR USE IN RECALLING HOW WIDESPREAD A  
24 CONTROL WAS EXERTED WITHIN THE GROUP.

25 Q RIGHT. AND WAS THE POINT THAT THERE IS SOME  
26 KIND OF A RESTRICTION THAT CHURCH UNIVERSAL IMPOSES UPON ITS  
27 MEMBERS WITH RESPECT TO MOVIES, BOOKS, TELEPHONE AND TV?

28 A YES, SIR.

1 Q AND LET'S TAKE THEM ONE AT A TIME. WITH  
2 RESPECT TO MOVIES, WHAT IS YOUR UNDERSTANDING OF THE  
3 RESTRICTION THAT THE CHURCH PLACES ON ITS MEMBERS?

4 A THAT THERE WERE SOME MOVIES THAT THEY WERE TOLD  
5 THEY WERE NOT TO SEE. AND YET MR. MULL HAD RECORDED IN ONE  
6 OF THOSE DOCUMENTS LISTED IN THE THING THAT HE HAD SEEN MRS.  
7 PROPHET AND ONE OR MORE OF HER FRIENDS COMING OUT OF SUCH A  
8 MOVIE THAT HE KNEW HAD BEEN BANNED FOR GENERAL MEMBERSHIP TO  
9 VIEW AND SO ON. SO THAT WAS A SOURCE OF THAT.

10 AND OTHER PEOPLE HAD TOLD ME THAT WHILE THEY  
11 WERE IN THE GROUP, THERE WERE THESE PROHIBITIONS AGAINST  
12 CERTAIN MOVIES. AND THAT ONE WAS TO KEEP VERY, VERY BUSY  
13 AND NOT TO WASTE TIME ON SUCH THINGS AS ENTERTAINMENT, WHICH  
14 WOULD BE READING, MOVIES, TV.

15 Q AND SO WOULD ALL OF THE PEOPLE YOU INTERVIEWED,  
16 THE EX-MEMBERS, WERE THEY ALL CONSISTENT IN TELLING YOU THAT  
17 CHURCH MEMBERS ARE NOT SUPPOSED TO SEE CERTAIN MOVIES THAT  
18 THE HIERARCHY TELLS THEM NOT TO SEE?

19 A NO. NOT EACH OF THEM TOLD ME EACH OF THESE  
20 THINGS.

21 Q DID YOU ASK EACH OF THEM ABOUT IT TO SEE IF  
22 THEIR RECOLLECTIONS WERE CONSISTENT?

23 A NO, SIR. BECAUSE I HAD ONLY LEARNED ABOUT IT  
24 AFTER I HAD INTERVIEWED SOME OF THE PEOPLE SO THAT I MISSED  
25 ASKING EARLY ON.

26 Q WELL, OF THE PEOPLE YOU INTERVIEWED -- THERE IS  
27 ABOUT FIVE OF THEM -- HOW MANY OF THEM DID YOU ASK ABOUT THE  
28 MOVIES?

1           A       EACH OF THE ONES LISTED, THE PUBLICLY NAMED  
2 PEOPLE, I THINK EACH OF THEM AT ONE TIME OR ANOTHER HAD  
3 MENTIONED THAT. I WAS THINKING OF THE OTHER EIGHT THAT I  
4 HAD THERAPY -- I DIDN'T LEARN UNTIL AFTER I HAD SEEN A  
5 COUPLE OF THOSE PEOPLE AREAS THAT WERE OF INTEREST TO LEARN  
6 ABOUT.

7           Q       AND DID THEY SAY THEY WERE NOT ALLOWED TO SEE  
8 THESE MOVIES OR IT WAS ADVISED THAT THEY DIDN'T SEE THEM?  
9 DO YOU HAVE ANY PARTICULAR RECOLLECTION?

10          A       WHICH PEOPLE ARE YOU REFERRING TO, SIR?

11          Q       THE ONES WITH RESPECT TO MOVIES.

12          A       THESE FIVE ON THE LIST?

13          Q       YES.

14          A       OKAY. WHAT'S YOUR QUESTION? WE ARE LIMITING  
15 IT TO THE FIVE. WHO DO YOU WANT --

16          Q       LIMITING IT TO THE FIVE, WHAT OTHER GROUP --

17          A       THE CONTEXT HAD NOT BEEN SPECIFIED ENOUGH BY  
18 YOU AS TO WHETHER YOU WANTED ME TO TELL YOU ABOUT ALL THE  
19 KNOWLEDGE I HAVE ABOUT CHURCH UNIVERSAL AND TRIUMPHANT  
20 POLICIES OR JUST THE FIVE PUBLICLY LISTED FOLKS.

21          Q       RIGHT. I AM INTERESTED IN THINGS THAT PEOPLE  
22 TOLD YOU PERSONALLY WHEN YOU SPOKE TO THEM AS OPPOSED TO YOU  
23 READ IT IN SOME DOCUMENT OR HEARD IT FROM ANOTHER  
24 RESEARCHER. IT DOESN'T HAVE TO NECESSARILY BE THOSE FIVE  
25 RIGHT THERE, BUT IT HAS TO BE SOMETHING YOU WERE TOLD IN A  
26 COMMUNICATION WITH SOMEBODY YOU INTERVIEWED WITH EITHER ON  
27 THE PHONE OR IN PERSON. OKAY?

28          A       WHAT IS THE QUESTION, SIR?

1 Q THE QUESTION IS OF THE PEOPLE YOU INTERVIEWED,  
2 DID THEY ALL TELL YOU THAT THEY WERE NOT ALLOWED TO SEE  
3 CERTAIN MOVIES?

4 A I CAN'T SAY IT ABOUT EVERY SINGLE ONE. THE  
5 ANSWER IS NO.

6 Q AND THE ONES THAT DID MENTION IT, DID THEY SAY  
7 THEY WERE REQUIRED NOT TO SEE THESE MOVIES OR DID THEY SAY  
8 IT WAS ADVISED THAT THEY NOT SEE THE MOVIES?

9 A IT WAS AN EVEN MORE IMPRESSIVE CONTEXT THAT  
10 THEY CONVEYED TO ME AND THAT WAS PART OF THE WHOLE COERCIVE  
11 PERSUASION OR THOUGHT REFORM PROGRAM IN WHICH THEY CONVEYED  
12 THAT THERE WERE ADMONITIONS ABOUT CERTAIN MOVIES.

13 BUT THE WHOLE CONTEXT OF CONTROL OVER THEIR  
14 BEHAVIOR WAS SUCH THAT THEY WERE MADE TO FEEL VERY GUILTY  
15 AND ANXIOUS IF THEY TOOK TIME AWAY FROM THE WORK THAT THEY  
16 WERE SUPPOSED TO BE DOING FOR MRS. PROPHET AND THE  
17 ORGANIZATION TO DO ANY OF THESE THINGS.

18 SO THAT THEY WERE CONVEYING TO ME THIS BROADER  
19 CONTEXT OF A KIND OF INDUCED GUILT AND FEAR THAT IF THEY DID  
20 THESE THINGS, THEY WOULD GET IN TROUBLE WITH MANAGEMENT,  
21 THEY WOULD APPEAR TO BE A LESSER BEING WITHIN THE  
22 ORGANIZATION AND THEY WOULD LOSE STATUS BY DOING THOSE  
23 RECREATIONAL THINGS.

24 SO THAT THAT'S PART OF WHAT THE THOUGHT REFORM  
25 PROGRAM CONTEXT THAT I WAS ALLUDING TO EARLIER PROVIDES. IS  
26 THAT YOU DON'T HAVE TO HAVE A DIRECT STATED ADMONITION ABOUT  
27 EVERY LITTLE RULE BECAUSE THE CONTEXT CAN BE BUILT UP.

28 Q AM I CORRECT, I SEEM TO BE HEARING THAT YOU ARE

1 NOW SAYING THAT THEY WEREN'T REALLY SUPPOSED TO GO TO THE  
2 MOVIES AS OPPOSED TO PARTICULAR MOVIES? AM I HEARING THAT  
3 OR AM I INCORRECT?

4 A I AM SAYING BOTH, SIR.

5 Q CAN YOU TELL ME WHAT YOUR UNDERSTANDING, BASED  
6 ON YOUR INTERVIEWS, WAS AS TO WHETHER CHURCH UNIVERSAL AND  
7 TRIUMPHANT MEMBERS COULD GO TO THE MOVIES WHEN THEY WANTED  
8 TO GO TO THE MOVIES?

9 A THAT TYPE OF A QUESTION HAS TO BE ANSWERED  
10 WITHIN THE STRUCTURE OF WHAT I LEARNED ABOUT THE  
11 ORGANIZATION. ON THE SURFACE, IT WOULD SOUND AS IF -- AND  
12 THIS IS WHAT EACH OF THE PEOPLE I INTERVIEWED CONVEYED TO  
13 ME. IT WOULD SOUND AS IF PEOPLE WERE FREE TO GO TO THE  
14 MOVIES IF THEY CHOSE. THAT IS A KIND OF STATEMENT LEVEL  
15 THAT COULD BE MADE.

16 BUT MY STUDY, THROUGH INTERVIEWING THESE PEOPLE  
17 AND THROUGH THE ONES THAT I HAD IN THERAPY AND THROUGH  
18 READING THESE MANY DOCUMENTS, THE CONTEXT OF PERMISSION WAS  
19 NEVER NEEDED TO BE SO BLATANTLY STATED AS, "DON'T GO TO THE  
20 MOVIES," BECAUSE THE AMOUNT OF LECTURING AND THE TOTAL  
21 CONTEXT OF THE ORGANIZATION MADE IT SO THAT A PERSON KNEW  
22 THAT THEY WOULD GET IN TROUBLE IF -- THEY WOULD BE REGARDED  
23 AS LESSER BEINGS, THAT THEY WOULD BE IN BAD GRACE IF THEY  
24 DID THESE THINGS SUCH AS MOVIES, TV, READING.

25 Q SO YOUR ANSWER YOU HAVE GIVEN FOR MOVIES ALSO  
26 GOES TO TV AND READING, AND YOU JUST SORT OF ENDED IT THAT  
27 WAY?

28 A YES, SIR. THAT THE CONTEXT OF HOW THE THOUGHT



1 REFORM PROGRAM WORKED MADE THE PEOPLE FEEL ANXIOUS AND  
2 GUILTY KNOWING WHAT WOULD HAPPEN TO THEIR STATUS WITHIN THE  
3 ORGANIZATION AND THE KINDS OF THINGS THAT WOULD COME DOWN ON  
4 THEM IF THEY MADE WHAT'S CALLED A UNILATERAL ACTION, MEANING  
5 GO TALK TO SOMEONE ON YOUR OWN, TALK TO A FRIEND OUTSIDE OF  
6 THE GROUP, DO RECREATIONAL STUFF THAT CAN BE CLASSED WITHIN  
7 THE ORGANIZATION AS A UNILATERAL ACTION. YOU THEN GET INTO  
8 A BAD POSITION TO BE REPRIMANDED AND PUT DOWN.

9 Q SO TO THE EXTENT OTHER WITNESSES WERE TO COME  
10 TO THIS COURT AND TESTIFY THAT THEY WERE CHURCH MEMBERS,  
11 THAT THEY WENT TO THE MOVIES ONCE A WEEK OR TWICE A WEEK AND  
12 THEY DIDN'T HAVE ANY GUILT OR ANY OF THAT, I TAKE IT THAT  
13 TESTIMONY WOULD BE VERY INCONSISTENT WITH WHAT YOU HEARD IN  
14 YOUR INTERVIEWS?

15 A IT WOULD BE INCONSISTENT IN THE SENSE ONLY THAT  
16 THEY WOULD NOT BE PROVIDING THE CONTEXT THAT MY INTERVIEWERS  
17 PROVIDED TO ME OF YES, AT A CERTAIN LEVEL YOU WOULD HAVE TO  
18 SAY THAT EVERY LITTLE TIME YOU WENT TO THE MOVIES WASN'T  
19 PROHIBITED. BUT THAT AS MEMBERS, MY INFORMANTS, MY  
20 INTERVIEWEES DESCRIBED THAT THEY FELT IT WOULD BE  
21 PROHIBITED.

22 Q IF PEOPLE TESTIFIED THAT THEY DIDN'T FEEL ANY  
23 GUILT, THEY DIDN'T FEEL IT WAS PROHIBITIVE AND THEY WENT TO  
24 THE MOVIES ONCE A WEEK, THAT WOULD BE INCONSISTENT WITH WHAT  
25 YOU LEARNED IN YOUR INTERVIEWS; ISN'T THAT TRUE?

26 A AT THE LEVEL YOU DESCRIBE IT, IT WOULD BE, YES,  
27 SIR.

28 Q NOW, IN YOUR INTERVIEWS, DID YOU REACH ANY

1 CONCLUSIONS AS TO WHETHER CHURCH UNIVERSAL AND TRIUMPHANT  
2 DISCOURAGES CONTACT WITH FAMILY AND FRIENDS THROUGH PHONE  
3 CALLS, LETTERS, VISITS AND THINGS LIKE THAT?

4 A YES.

5 Q AND WHAT CONCLUSIONS DID YOU REACH THROUGH YOUR  
6 INTERVIEWS?

7 A I REACHED THE CONCLUSION THAT NOT ONLY IS IT  
8 DONE VERBALLY, BUT IT'S ALSO IN THEIR PRINTED DOCUMENTS.

9 Q YOU ARE REFERRING TO --

10 A AND THAT SUCH CONTACTS ARE, IF NOT PROHIBITED,  
11 THEY ARE SEVERELY LIMITED, RESTRICTED AND PUT DOWN AS NOT TO  
12 BE DONE.

13 Q WHEN YOU SAY, "IT IS IN THAT PRINTED DOCUMENT,"  
14 YOU ARE REFERRING TO THAT SUMMIT UNIVERSITY CODE OF CONDUCT?

15 A YES, SIR. THERE ARE SEVERAL OF THOSE.

16 Q YOU ARE AWARE THAT THE SUMMIT UNIVERSITY CODE  
17 OF CONDUCT APPLIES TO A THREE-MONTH COURSE? ARE YOU AWARE  
18 OF THAT?

19 A YES, SIR. THAT IS THE BASIC INDOCTRINATION  
20 PROGRAM IN WHICH THIS NEW VALUE SYSTEM IS BUILT INTO. AND,  
21 AS I EXPLAINED EARLIER, THE CONDUCT IS CHANGED THROUGH THE  
22 PROGRAM.

23 Q NOW, ARE YOU AWARE THAT THAT THREE-MONTH CODE  
24 OF CONDUCT DOES NOT APPLY TO PEOPLE WHO ARE LIVING AT  
25 CAMELOT WHO ARE NOT GOING TO SUMMIT UNIVERSITY? ARE YOU  
26 AWARE OF THAT?

27 A NO, SIR. PEOPLE CONVEYED TO ME THAT IF THEY  
28 WERE THERE AT CAMELOT, UNLESS THEY WERE OF THE HIGHER

1 ECHELON -- MRS. PROPHET, MR. FRANCIS, PEOPLE AT THE TOP OF  
2 THE POWER STRUCTURE -- THAT THE REST OF THEM WERE EITHER TOO  
3 BUSY OR BECAUSE OF THE FEELINGS OF GUILT, SHAME AND THAT  
4 THEY WERE NOT DOING ENOUGH WORK FOR THE GROUP WOULD COME  
5 INTO PLAY.

6 Q SO THE PEOPLE YOU INTERVIEWED CONVEYED TO YOU  
7 THE IMPRESSION THAT THAT CODE OF CONDUCT FOR SUMMIT  
8 UNIVERSITY APPLIED AT CAMELOT AND THROUGHOUT THEIR -- LET ME  
9 WITHDRAW THAT.

10 THE PEOPLE YOU SPOKE TO CONVEYED TO YOU THE  
11 IMPRESSION THAT THAT CODE OF CONDUCT APPLIED IF YOU LIVED AT  
12 CAMELOT AND DIDN'T GO TO SUMMIT UNIVERSITY; IS THAT RIGHT?

13 A THEY CONVEYED TO ME THAT ONCE THEY HAD BEEN  
14 THROUGH THE RATHER INTENSE INDOCTRINATION PROGRAM THAT  
15 OCCURS AT THE CAMELOT UNIVERSITY, THAT FROM THAT POINT ON,  
16 NO ONE HAD TO INSIST UPON IT. THEY KNEW IT WAS EXPECTED  
17 CONDUCT.

18 Q DO YOU KNOW WHETHER CHURCH MEMBERS WHO LIVED AT  
19 CAMELOT, SAY IN 1979 THROUGH 1980 WHEN MR. MULL LIVED THERE,  
20 DO YOU KNOW IF THERE WERE ANY RESTRICTIONS ON THEM WRITING  
21 LETTERS OR RECEIVING LETTERS FROM NONCHURCH MEMBERS?

22 A I DON'T KNOW ABOUT THE LETTERS, BUT IT WAS  
23 CONVEYED TO ME THAT THEY WERE ALL SO BUSY, THEY DIDN'T HAVE  
24 TIME FOR SUCH IN ANY NORMAL AMOUNT.

25 Q YOU SAY, "THEY WERE ALL SO BUSY." DID YOU GET  
26 AN IMPRESSION FROM YOUR INTERVIEWS AS TO HOW MANY HOURS A  
27 DAY THE PEOPLE WORKED WHILE THEY WERE LIVING AT CAMELOT?

28 A YES.

1 Q HOW MANY HOURS A DAY DID THEY WORK?

2 A PEOPLE CONVEYED TO ME THAT IF THEY HAD JOBS OFF  
3 THE PREMISES, THEY MIGHT HAVE A 40-HOUR A WEEK JOB THERE.  
4 AND THEN WHEN THEY CAME BACK TO CAMELOT, THEY WERE TO DONATE  
5 ANOTHER 20 HOURS THERE, PLUS THEY HAD THE DECREES IN THE  
6 MORNING AND DECREES IN THE EVENING AND SERVICES WEDNESDAY,  
7 FRIDAY, SATURDAY AND SUNDAY TO GO TO. SO THAT THEIR WEEK  
8 WAS PACKED BY THESE THINGS THAT I HAVE MENTIONED.

9 Q DID THEY TELL YOU, THE ONES WHO ACTUALLY LIVED  
10 ON CAMPUS, HOW MANY HOURS A DAY THEY WORKED WHILE THEY LIVED  
11 ON CAMPUS? JUST WORK, I AM NOT TALKING ABOUT DECREERING.

12 A YES, SIR.

13 Q HOW MANY HOURS?

14 A I AM NOT SURE BECAUSE YOUR QUESTION HAS LIVED  
15 ON THE GROUNDS AT CAMELOT. AND SOME OF THESE PEOPLE  
16 DESCRIBED TO ME THAT THEY LIVED OFF THE GROUNDS AND THAT  
17 THERE WERE JUST CERTAIN FOLKS LIVED ON THE GROUNDS AT  
18 CAMELOT. THE OTHERS WERE BUSSED IN AND THEY DECREED ON  
19 THEIR WAY ON THE BUS, SOMETIMES 20 TO 45-MINUTE BUS RIDES,  
20 SO THEY DECREED ON THEIR WAY, THEY DECREED ON THE WAY BACK.

21 Q YOU ARE TALKING ABOUT THE BUS RIDE TO SUMMIT  
22 UNIVERSITY?

23 A YES, SIR. OR COMING TO THE GROUNDS.

24 Q DID MR. MULL TELL YOU HOW MANY HOURS A DAY HE  
25 WORKED WHILE HE WAS LIVING AT CAMELOT?

26 A WELL, WHILE HE WAS DOWN HERE WITH THE CAMELOT  
27 OR WHEREVER IT IS UP AT CALABASAS, HE IMPLIED THAT HE  
28 AVERAGED ABOUT 16 HOURS A DAY WORK. AND HE SAID HE OFTEN

1 SLEPT ON THE FLOOR UNDERNEATH HIS DRAWING BOARD BECAUSE HE  
2 WORKED SUCH LONG HOURS.

3 AND MR. RANDALL KING IN AN INTERVIEW SAID THAT  
4 HE HAD FREQUENTLY DROPPED IN AND FOUND THAT MR. MULL WOULD  
5 STILL BE WORKING AT 12:30 TO 1:30 A.M. HAVING BEEN AROUND  
6 THE DAY WORKING. SO THAT BOTH OF THOSE SOURCES INDICATED  
7 THAT MR. MULL DID WORK LONG HOURS.

8 Q DID YOU DO ANYTHING TO TAKE INTO ACCOUNT THE  
9 FACT THAT THE TWO SOURCES YOU JUST MENTIONED, MR. MULL AND  
10 MR. KING, BOTH HAVE LAWSUITS AGAINST THE CHURCH AND MIGHT  
11 HAVE SOME BIAS IN WHAT FACTS THEY RELATE TO YOU?

12 A YES, SIR.

13 Q WHAT DID YOU DO TO TAKE THAT INTO ACCOUNT?

14 A WHAT YOU DO IS BECAUSE WHEN YOU ARE  
15 INTERVIEWING SOMEONE WHERE YOU KNOW THAT THEY DO HAVE  
16 SOMETHING THAT THE WORLD MIGHT THINK IS A VERY BIASED THING,  
17 YOU HAVE TO BE SURE TO ASK THEM IN DIFFERENT WAYS, COME BACK  
18 AROUND SEVERAL TIMES TO, ONE, TEST FOR CONSISTENCY OF THEIR  
19 STORY, ARE THEY CONSISTENTLY CONVEYING TO YOU A STORY.

20 AND THEN ALSO YOU HAVE TO USE YOUR OWN YEARS OF  
21 EXPERIENCE, YOUR OWN INNER YARDSTICK OF IS THIS PERSON  
22 CONNING ME, IS THIS PERSON TRYING TO LAY A TRIP ON THAT WILL  
23 CONVINC ME OF SOMETHING THAT'S NOT TRUE?

24 SO THAT YOU HAVE TO USE YOUR PROFESSIONAL  
25 TRAINING, YOUR EXPERIENCE WITH MANY HUNDREDS IF NOT  
26 THOUSANDS OF PEOPLE YOU'VE INTERVIEWED TO SEE WHAT IS THE  
27 CONCLUSION OF TRUSTWORTHINESS THAT YOU PUT INTO WHETHER YOU  
28 BELIEVE OR DON'T BELIEVE.

1 Q IN THAT REGARD, I WAS LOOKING AT THE LIST OF  
2 DOCUMENTS THAT YOU LOOKED AT AND YOU HAVE A FEW LETTERS FROM  
3 MR. MULL. BUT MOST OF THEM SEEM TO BE -- ALL EXCEPT ONE OF  
4 THEM IN FACT SEEM TO BE AFTER HE LEFT THE CHURCH, AM I  
5 CORRECT? THE LETTERS FROM MR. MULL TO CHURCH OFFICIALS ARE  
6 ALL AFTER 1981 EXCEPT FOR ONE?

7 A YES. SOME WERE WRITTEN CLOSE TO THAT TIME.

8 Q BUT THEY WERE ALL AFTER HE LEFT AFTER THAT  
9 MEETING IN JUNE OF 1980?

10 A I BELIEVE SO, YES.

11 Q WERE YOU AWARE WHILE YOU WERE DOING YOUR  
12 INVESTIGATION THAT THERE WERE NUMEROUS LETTERS WRITTEN BY  
13 MR. MULL TO CHURCH OFFICIALS FROM 1975 TO 1980 WHILE HE WAS  
14 A MEMBER OF THE CHURCH? ARE YOU AWARE OF THAT?

15 A YES, SIR, I WAS AWARE.

16 Q AND IN CHECKING UP ON MR. MULL AND MR. KING AND  
17 SEEING THAT THEY WERE REALLY TELLING YOU THE TRUE FACTS  
18 ABOUT WHAT HAPPENED IN THOSE YEARS 1975 TO 1980, WAS THERE  
19 ANY REASON THAT YOU DIDN'T READ ALL THOSE LETTERS FROM 1975  
20 TO 1980 WRITTEN BY MR. MULL?

21 A I HAVE NO IDEA WHERE THOSE DOCUMENTS EXIST AND  
22 RESIDE. BUT I WOULD BE HAPPY TO READ THEM.

23 Q BUT YOU DIDN'T READ THEM IN PREPARATION FOR  
24 THIS TESTIMONY, YOU HAVEN'T READ THEM AS OF TODAY; IS THAT  
25 RIGHT?

26 A NO, SIR. THEY WERE NOT ON THE LIST I PRESENTED  
27 TO YOU.

28 Q AND WOULD YOU AGREE THAT IT WOULD ENHANCE THE

1 VALIDITY OF YOUR CONCLUSIONS IF YOU HAD READ LETTERS WRITTEN  
2 BY MR. MULL ACTUALLY DURING THOSE YEARS, 1975 TO 1980?  
3 WOULD THAT HAVE ENHANCED THE VALIDITY OF YOUR CONCLUSIONS?

4 A YES, SIR, BECAUSE I THINK WHAT IT WOULD HAVE  
5 PROVIDED ME WAS MORE EXAMPLES AND MORE EVIDENCE OF HIS STATE  
6 OF MIND AS HE WAS WITHIN THE ORGANIZATION USING THEIR  
7 LANGUAGE. AND IT WOULD HAVE GIVEN ME MORE EVIDENCE OF WHAT  
8 WAS TRANSPIRING BETWEEN MANAGEMENT AND HIM, AND HIS STATE OF  
9 MIND AS TO HOW MUCH OF THE THOUGHT REFORM PROGRAM OPERATED  
10 IN TERMS OF KEEPING HIS LANGUAGE WITHIN THE LANGUAGE THAT  
11 THE GROUP WOULD SANCTION AND SO ON SO THAT IT WOULD HAVE  
12 GIVEN ME LOTS MORE PERHAPS SURENESS OF THE STATE OF HIS  
13 COGNITIVE PROCESSES IN RELATION TO THE THOUGHT REFORM  
14 PROGRAM TO SEE THOSE DOCUMENTS.

15 Q I TAKE IT THAT IF YOU HAD READ THOSE DOCUMENTS,  
16 IT IS ALSO POSSIBLE THAT IT WOULD HAVE CONVINCED YOU THAT  
17 THERE WASN'T A THOUGHT REFORM PROGRAM; ISN'T THAT ALSO  
18 POSSIBLE?

19 A NO, SIR, NOT ON THE DOCUMENTS ALONE.

20 Q SO NO MATTER WHAT MR. MULL WROTE IN THOSE  
21 DOCUMENTS DURING 1975 TO 1980, NO MATTER WHAT THEY SAID, IT  
22 WOULD NOT HAVE ALTERED YOUR OPINION THAT THERE WAS A THOUGHT  
23 REFORM PROGRAM THAT HE WAS A VICTIM OF?

24 A NO. WHAT I WAS SAYING WAS I WAS EXCLUDING THAT  
25 I WAS RELYING OR WOULD RELY ONLY ON ONE SOURCE OF DATA SUCH  
26 AS THE LETTERS. MY ANSWER WAS TO CONVEY TO YOU THAT THE  
27 PRESENCE IN MY OPINION OF A THOUGHT REFORM PROGRAM WAS A  
28 MUCH BROADER BASED OPINION.

1 Q BUT ON THE QUESTION OF WHETHER MR. MULL -- THAT  
2 PARTICULAR PERSON WAS COERCIVELY PERSUADED TO DO THE THINGS  
3 HE DID, THOSE LETTERS EXPRESSING HIS THOUGHTS AND OPINIONS  
4 DURING THE YEARS IN QUESTION COULD IN FACT CHANGE YOUR  
5 CONCLUSION AS TO HIM, ISN'T THAT TRUE, DEPENDING ON WHAT  
6 THEY SAID?

7 A THEY COULD. THERE IS ALWAYS THAT POSSIBILITY  
8 THAT THEY COULD. BUT YOU ARE PROBABLY AWARE THAT I HAVE  
9 ALSO READ WHAT'S LISTED IN THERE IS THE TRANSCRIPT OF THE  
10 TWO-AND-A-HALF HOUR INTERCHANGE BETWEEN MR. MULL, SHEARER,  
11 KING (SIC) AND MRS. PROPHET. SO THAT THAT WAS A DOCUMENT  
12 THAT I READ THAT GAVE A PICTURE OF HIS STATE OF MIND AND THE  
13 COERCIVE PERSUASION AND THE TYPES OF THINGS THAT WERE  
14 BROUGHT TO BEAR UPON HIM DURING THAT PERIOD OF TIME WHILE HE  
15 WAS STILL WITHIN THE ORGANIZATION.

16 Q FOR EXAMPLE, DID MR. MULL SPEAK TO YOU AT ALL  
17 ABOUT WHETHER HE WAS ALLOWED TO HAVE CONTACT WITH PEOPLE WHO  
18 HAD DROPPED THE TEACHINGS?

19 A YES, SIR. HE DID EXPLAIN. AND THERE WAS A  
20 DOCUMENT LISTED OF THE TROUBLE HE GOT INTO. IT WAS A LETTER  
21 LISTED IN HERE FROM MONROE SHEARER CONVEYING MOTHER, THAT IS  
22 MRS. PROPHET'S, SORT OF CONDEMNATION OF MR. MULL HAVING A  
23 CONTACT WITH A FRIEND OF HIS.

24 IT HAD BEEN A MAN WHO HAD BEEN, IF I REMEMBER  
25 CORRECTLY, A CONTRACTOR WHO HAD WORKED WITH HIM FOR ABOUT  
26 THREE YEARS. AND THIS MAN HAD LEFT THE ORGANIZATION AND MR.  
27 MULL MET WITH HIM. AND THEN THIS LETTER CAME DOWN  
28 CONDEMNING HIS TAKING A UNILATERAL ACTION AND TALKING WITH A



1 MAN WHO HAD BEEN A FRIEND OF HIS, A COLLEAGUE AND A  
2 CONTRACTOR WITH WHOM HE HAD WORKED IN THOSE YEARS SO THAT  
3 THERE WAS THAT LIMIT.

4 AND EVIDENCE OF THAT THAT SUPPORTED THE  
5 STATEMENTS THAT HE AND OTHERS MADE ABOUT THIS POLICY OF  
6 UNILATERAL ACTION AND CONTACT WITH PEOPLE OUTSIDE OF THE  
7 GROUP AND THE CONTACT WITH PEOPLE WHO HAD LEFT.

8 Q NOW, DID YOU ALSO GET TO SEE A LETTER WRITTEN  
9 AFTER MR. MULL CONCLUDED SUMMIT UNIVERSITY WHERE HE WROTE TO  
10 ELIZABETH CLARE PROPHET AND SAID, "I SPOKE TO" A CERTAIN  
11 PERSON, I THINK THE NAME WAS ALEX BENNETT, WHO HAD DROPPED  
12 THE TEACHINGS AND JUST WENT ON TO TALK ABOUT WHAT A GOOD  
13 FRIEND HE WAS OF ALEX BENNETT? DID YOU SEE THAT LETTER?

14 A NO, SIR.

15 THE COURT: LET'S STAND UP AND STRETCH FOR A MINUTE.

16 MR. LEVY: IF THE COURT PLEASE, I WOULD LIKE TO  
17 SUGGEST TO MR. KLEIN THAT IF HE WANTED TO DISCUSS THAT  
18 LETTER WITH MISS SINGER, HE MIGHT WANT TO SHOW IT TO HER SO  
19 SHE CAN EXAMINE IT.

20 MR. KLEIN: THAT IS EXACTLY WHAT I PLAN TO DO. YOU  
21 READ MY MIND.

22 I AM SHOWING THE WITNESS WHAT HAS BEEN MARKED  
23 NUMBER 42 IN EVIDENCE, THE LETTER DATED JUNE 16TH, 1976.

24 Q YOU HAVE HAD A CHANCE TO READ WHAT'S BEEN  
25 MARKED AS NUMBER 46 IN EVIDENCE?

26 A IT SAYS 42.

27 Q I AM SORRY, 42. THAT IS THE LETTER OF JUNE  
28 16TH, 1976?

1 A YES, SIR.

2 Q FROM MR. MULL TO BELOVED MOTHER?

3 A YES, SIR.

4 Q THE PART I WAS TALKING ABOUT WAS THE BEGINNING  
5 OF THAT SECOND PARAGRAPH WHERE IT SAYS:

6 "ALEXANDER DROPPED THE  
7 TEACHINGS OF THE ASCENDED MASTERS UPON  
8 LEAVING SCHOOL, BUT WE HAVE REMAINED CLOSE  
9 FRIENDS. HE IS A GOOD PERSON AND PURE."

10 THAT IS THE PART. DO YOU SEE THAT?

11 A YES, SIR.

12 Q MY QUESTION IS THAT IS THAT TYPE OF A STATEMENT  
13 WHERE HE SAYS SOMETHING GOOD ABOUT A PERSON WHO HAS DROPPED  
14 THE TEACHINGS IN A LETTER THAT HE IS WRITING TO ELIZABETH  
15 CLARE PROPHET, IS THAT CONSISTENT WITH THE KIND OF  
16 INFORMATION THAT WAS AVAILABLE TO YOU WHEN YOU REACHED YOUR  
17 CONCLUSIONS?

18 A YES, SIR.

19 Q HOW IS IT CONSISTENT? LET ME JUST MAKE ONE  
20 POINT BEFORE I ASK YOU THAT.

21 AM I CORRECT YOU NEVER SAW THAT LETTER PRIOR TO  
22 ME JUST SHOWING IT TO YOU?

23 A YES, I HAD NOT SEEN IT.

24 Q NOW, CAN YOU TELL ME HOW IT IS CONSISTENT WITH  
25 YOUR CONCLUSIONS?

26 A WELL, IT IS CONSISTENT WITH THE CONCLUSION I  
27 HAVE THAT MR. MULL APPEARS TO BE A RATHER GENTLE SOUL. AND  
28 WHAT HE'S REFERRING TO HERE IN THIS THING, IT SAYS:

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"ALEXANDER DROPPED THE TEACHINGS OF THE ASCENDED MASTERS UPON LEAVING SCHOOL, BUT WE HAVE REMAINED CLOSE FRIENDS. HE IS A GOOD PERSON AND PURE."

SO THAT THIS IS STILL MR. MULL'S RATHER GENTLE WAY AND HE IS SAYING THAT THIS MAN IS GOING TO STUDY POLITICAL SCIENCE AND SO ON. IT JUST IS REFLECTIVE OF SOME OF THE NICER PARTS OF MR. MULL AND IT INDICATES HE'S TALKED TO WHOEVER ALEXANDER WAS THAT HAD, QUOTE, "DROPPED THE TEACHINGS."

Q ISN'T IT REFLECTIVE OF THE FACT THAT THERE IS NO PROHIBITION OF -- AGAINST MR. MULL TALKING TO PEOPLE WHO HAVE DROPPED THE TEACHINGS?

A NO, SIR. HE DOESN'T SAY THAT HE HAS LEFT THE ORGANIZATION OR HAS BEEN THROWN OUT OF THE ORGANIZATION. I DON'T KNOW WHAT THE REFERENCE IS TO ALEXANDER DROPPING THE TEACHINGS. THIS COULD HAVE BEEN SOMEONE THAT WAS ATTENDING ONE OF THE TEACHING CENTERS OR SOMETHING, BUT IT IS NOT INCONSISTENT WITH THE FACT THAT HE'S WRITING A LETTER TO MRS. PROPHET.

Q YOU DON'T UNDERSTAND THAT TO MEAN THAT ALEXANDER IS -- NO LONGER HAS ANYTHING TO DO WITH THE TEACHINGS, "DROPPED THE TEACHINGS"?

A THE CONTEXT OF THE LETTER SEEMS TO BE THAT THIS MR. ALEXANDER BENNETT THAT GETS MENTIONED IN THE FIRST SENTENCE HAS GIVEN MR. MULL A PLAY TAPE, AND I AM ASSUMING AN AUDIO TAPE, "AND HAS PERMITTED ME TO PASS IT ON TO YOU AS A GIFT. YOU COULD USE IT AS CLASS INSTRUCTION."

1 AND THEN HE SAYS WHAT'S ALREADY COME UP, THAT  
2 ALEXANDER DROPPED THE TEACHINGS. "HE IS A GOOD PERSON AND  
3 PURE. HE IS STUDYING POLITICAL SCIENCE." HE WILL STUDY  
4 RUSSIAN AND SO ON.

5 IT JUST SOUNDS LIKE THIS IS A PERSON THAT MR.  
6 MULL LIKED. HE'S DROPPED THE TEACHINGS, HE GAVE MULL A TAPE  
7 AND MULL IS PASSING ON TO MRS. PROPHET A TAPE THAT HE IS  
8 GIVING HER AS A PRESENT.

9 Q LET'S MAKE AN ASSUMPTION. I WOULD LIKE YOU FOR  
10 PURPOSES OF THIS NEXT QUESTION TO ASSUME WHEN IT SAYS,  
11 "ALEXANDER DROPPED THE TEACHINGS," THAT ALEXANDER ENDED HIS  
12 AFFILIATION WITH THE CHURCH. ASSUME THAT IS WHAT THAT MEANS  
13 WHEN IT SAYS HE DROPPED THE TEACHINGS.

14 WITH THAT ASSUMPTION, WOULD WHAT YOU ARE  
15 READING IN THIS LETTER, THE FACT HE IS WRITING A LETTER TO  
16 ELIZABETH CLARE PROPHET TELLING HER HE STILL REMAINS CLOSE  
17 FRIENDS WITH HIM, TELLING HER HE IS A GOOD PERSON, WOULD  
18 THIS LETTER BE INCONSISTENT WITH WHAT YOU LEARNED DURING THE  
19 COURSE OF YOUR INVESTIGATION AS FAR AS THE CHURCH'S ATTITUDE  
20 ON MEMBERS TALKING AND SAYING NICE THINGS ABOUT NONMEMBERS?

21 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT  
22 CALLS FOR SPECULATION, IT CALLS FOR CONCLUSION.

23 MR. KLEIN: SHE IS AN EXPERT.

24 THE COURT: SUSTAINED.

25 MR. KLEIN: YOUR HONOR, MIGHT I ASK THAT QUESTION  
26 SUBJECT TO CONNECTION?

27 THE COURT: ALL RIGHT. YES, YOU CAN ASK THE  
28 QUESTION SUBJECT TO CONNECTION.

1 Q BY MR. KLEIN: DO YOU WANT IT TO BE READ BACK  
2 OR DO YOU REMEMBER THE QUESTION?

3 THE WITNESS: NO, SIR. I'D LIKE YOU TO READ IT BACK.

4 MR. KLEIN: YOUR HONOR, MAY THE STENOGRAPHER READ  
5 BACK THE QUESTION?

6 THE COURT: ALL RIGHT.

7 MR. KLEIN: THANK YOU.

8 (THE QUESTION WAS READ.)

9 THE WITNESS: NO.

10 Q BY MR. KLEIN: WHY NOT?

11 A BECAUSE IT'S PROBABLY NOT POSSIBLE FOR THE  
12 ORGANIZATION TO TOTALLY CONTROL EVERY CONTACT THAT PEOPLE  
13 MAKE SO THAT HIM WRITING THIS LETTER TO MRS. PROPHET AND  
14 SENDING HER THE PRESENT OF THE TAPE SIMPLY IS AN ACT ON HIS  
15 PART AND IS NOT IN ANY GREAT WAY INCONSISTENT WITH WHAT I'VE  
16 SAID.

17 Q DO YOU SEE ANY SIGNIFICANCE IN THE FACT NOT  
18 JUST THAT MR. MULL HAD CONTACT WITH SOMEBODY WHO HAD LEFT  
19 THE TEACHINGS, BUT THAT HE WAS WRITING A LETTER TO ELIZABETH  
20 CLARE PROPHET TELLING HER ABOUT IT? IS THAT SIGNIFICANT AT  
21 ALL?

22 A ONLY IN THE SENSE THAT HE IS WRITING TO HER TO  
23 GIVE HER A PRESENT, WHICH HE STATES IN THE LETTER.

24 Q WITH RESPECT TO HOW MANY HOURS MR. MULL WORKED,  
25 THAT 16 HOURS, DID THAT INCLUDE DECREES OR WAS THAT JUST  
26 WORK?

27 A IT HAD BEEN IMPLIED TO ME THAT THAT WAS THE  
28 WORK SECTION.

1 Q SO HE SPENT 16 HOURS A DAY JUST WORKING; IS  
2 THAT --

3 A IT WAS CONVEYED TO ME THAT FROM THE TIME HE GOT  
4 UP IN THE MORNING UNTIL THE TIME THAT HE WOULD OCCASIONALLY  
5 SLEEP UNDER HIS DRAWING BOARD, THAT OFTENTIMES IT WOULD BE  
6 16 HOURS. HE HAD AT NO TIME CONVEYED TO ME THAT EVERY DAY  
7 WAS A 16-HOUR DAY, BUT THAT IT FREQUENTLY HAPPENED.

8 Q MY QUESTION THOUGH IS DID THAT 16 HOURS AS WAS  
9 CONVEYED TO YOU IN YOUR INTERVIEWS WITH MR. MULL AND/OR MR.  
10 KING, DID THAT 16 HOURS INCLUDE DECREERING?

11 A NO, SIR. IT WAS MY UNDERSTANDING THAT WAS WORK  
12 TIME ON HIS BUILDING PLANNING AND WORK.

13 Q AND OTHER THAN TALKING TO MR. KING, DID YOU  
14 CHECK OUT IN ANY WAY THE ACCURACY OF THAT STATEMENT THAT MR.  
15 MULL WORKED 16 HOURS A DAY ON THE AVERAGE?

16 A I DID NOT TAKE IT AS A SPECIFIC QUESTION, BUT I  
17 DID PUT TO MR. TROWBRIDGE, MRS. TROWBRIDGE, MISS PAT BROWN  
18 THE LENGTH OF HOURS AND IT WAS CONSISTENT WITH THE DAYS  
19 BEING QUITE LONG FOR ALL.

20 Q DID YOU ASK MR. MULL HOW MANY HOURS A DAY HE  
21 SPENT DECREERING WHEN HE LIVED AT CAMELOT?

22 A WE HAVEN'T ESTABLISHED THAT HE ACTUALLY LIVED  
23 AT CAMELOT ON THE PROPERTY EXCEPT WHEN HE SLEPT UNDER THE  
24 DRAWING BOARD. MY REMEMBRANCES WERE OF HIM OCCASIONALLY  
25 COMING ON BUSES AND SO ON SO THAT I AM NOT TESTIFYING THAT I  
26 KNEW EXACTLY WHERE HE SLEPT, BUT WHEN HE WORKED HERE AT THE  
27 CAMELOT COMPOUND.

28 Q BASED ON YOUR INTERVIEWS WITH MR. MULL, DO YOU

1 KNOW WHETHER THERE WAS A PERIOD OF TIME THAT HE ACTUALLY  
2 LIVED AT CAMELOT?

3 A I CAN'T REALLY BE SURE WHAT WERE HIS ACTUAL  
4 DOMICILE QUARTERS, NO.

5 Q ISN'T THAT SOMETHING THAT WOULD BE SIGNIFICANT  
6 FOR YOUR FINDINGS, TO KNOW WHETHER THERE WAS A PERIOD OF  
7 TIME WHETHER HE LIVED AT CAMELOT?

8 A NO, SIR.

9 Q SO YOUR FINDINGS WOULD NOT BE ANY DIFFERENT IF  
10 HE LIVED AT CAMELOT FOR A YEAR-AND-A-HALF OR IF HE LIVED AT  
11 CAMELOT FOR TWO DAYS; IS THAT RIGHT?

12 A I DON'T UNDERSTAND YOUR QUESTION.

13 Q WOULD YOUR CONCLUSIONS THAT YOU GAVE US TODAY  
14 ABOUT MR. MULL BEING THE VICTIM OF COERCIVE PERSUASION,  
15 WOULD THEY BE ANY DIFFERENT IF YOU FOUND OUT THAT MR. MULL  
16 LIVED AT CAMELOT FOR A YEAR-AND-A-HALF AS OPPOSED TO IF YOU  
17 FOUND OUT HE LIVED AT CAMELOT FOR THREE DAYS?

18 A NO, SIR. BECAUSE WHAT I DESCRIBED IN MY  
19 EARLIER TESTIMONY TODAY WAS DESCRIBING THE ENTIRE PROGRAM TO  
20 WHICH HE HAD BEEN EXPOSED. AND IT DIDN'T HINGE UPON ONE  
21 SPECIFIC DETAIL.

22 Q WELL, THIS WORKING 16 HOURS A DAY, DO YOU KNOW  
23 IF HE WORKED THOSE 16 HOURS A DAY LIVING AT CAMELOT OR IF HE  
24 WORKED THEM WHEN HE LIVED AT HIS HOUSE IN SAN FRANCISCO?

25 A THEY WERE REPORTED TO ME, YES. THE ANSWER IS  
26 YES, I KNOW THEY WERE REPORTED AS THE CONDITIONS WHEN HE  
27 WORKED DOWN AT THE C.U.T. PROPERTY.

28 Q BUT YOU DON'T KNOW HOW LONG HE LIVED AT THE

1 C.U.T. PROPERTY?

2 A I AM TESTIFYING -- AND YOU HAVE THE SHEET OF  
3 PAPER IN YOUR POSSESSION THAT HAS THE EXACT DATES OF WHEN HE  
4 MOVED DOWN AND WE CAN READ THOSE DETAILS FROM THIS SHEET.

5 FROM MY NOTES WITH HIM AND INTERVIEWS, IT SAYS  
6 JANUARY, 1977, MOVES TO CAMELOT. APRIL, '79, KATHLEEN  
7 KICKED OUT. FALL, '79, SIGNED NOTES. MAY, '80, CONFRONTS  
8 THE BOARD. JUNE, '80, TWO-AND-ONE-HALF HOUR MEETING, KICKED  
9 OUT.

10 SO THAT I AM ASSUMING THAT HE WAS IN THE  
11 VICINITY OF CAMELOT AND WORKING ON THE PROPERTY,  
12 PARTICULARLY JANUARY, '77, TILL HE WAS EJECTED IN JUNE OF  
13 '80.

14 Q SO YOUR ASSUMPTIONS ON WHICH YOU BASED YOUR  
15 CONCLUSION WAS THAT HE WAS LIVING AND WORKING AT CAMELOT  
16 FROM JANUARY, '77, TO ABOUT JUNE, '80, WHICH IS ABOUT  
17 THREE-AND-A-HALF YEARS; IS THAT RIGHT?

18 A NO, SIR. FROM JANUARY, '79, TO JUNE, '80, IS  
19 NOT THREE-AND-A-HALF YEARS.

20 Q I THOUGHT YOU SAID JANUARY, '77. WAS I  
21 MISTAKEN?

22 A YES, SIR. OR I MADE A SLIP OF THE TONGUE. I  
23 HAD MEANT TO READ FROM THE DOCUMENT JANUARY, 1979. AND THAT  
24 HE WAS KICKED OUT IN JUNE OF '80.

25 Q BUT AM I CORRECT IT DOESN'T REALLY MATTER IF IT  
26 WAS A YEAR-AND-A-HALF OR THREE YEARS AS FAR AS YOUR  
27 CONCLUSIONS ARE CONCERNED AS TO WHETHER HE WAS COERCIVELY  
28 PERSUADED; IS THAT RIGHT?



1           A       YOUR QUESTION IS HARD TO ANSWER BECAUSE IT IS  
2           SO BROAD. BUT I WILL REFRAME MY ANSWER THAT THE SPECIFIC  
3           AMOUNT OF TIME IS MERELY ONE DETAIL OF HIS CAREER IN THIS  
4           GROUP AND THAT WHAT I STATED EARLIER THIS MORNING STILL  
5           HOLDS. THE CONTEXT IN WHICH THAT SERVICE, THAT PERIOD OF  
6           TIME EXISTED HOLDS TO EXPLAIN WHAT THE COERCIVE PERSUASION  
7           OR THOUGHT REFORM PROGRAM WAS LIKE.

8           Q       DID YOU REACH A CONCLUSION AS TO WHEN HE FIRST  
9           BECAME THE VICTIM OF THIS COERCIVE PERSUASION, WHAT YEAR?

10          A       YES, SIR.

11          Q       WHAT YEAR WAS THAT?

12          A       IT BEGAN -- AND IT WAS YOUR INTRODUCTION OF THE  
13          WORD "VICTIM" -- HIS VICTIMIZATION BEGAN IN 1974.

14          Q       AND WHEN DID IT END?

15          A       IT'S STILL CONTINUING. HE IS STILL A VICTIM OF  
16          THE CONSEQUENCES OF THAT ORIGINAL CONTACT AND ALL THE  
17          SUBSEQUENT BEHAVIOR THAT WAS DONE TO HIM.

18          Q       MY QUESTION IS THOUGH WHEN DID HE CEASE BEING  
19          COERCIVELY PERSUADED BY THIS GROUP?

20          A       I AM NOT SURE THAT IT'S HAPPENED YET BECAUSE I  
21          HAVEN'T TALKED WITH HIM RECENTLY TO SEE IF ANY HARASSMENT IN  
22          RECENT TIMES HAS HAPPENED TO HIM.

23          Q       SO ANY TIME THERE IS SOME HARASSMENT, THEN THAT  
24          WOULD MEAN HE IS STILL BEING COERCIVELY PERSUADED BY THEM?

25          A       YES, SIR. IF THERE IS A CONNECTION BETWEEN THE  
26          HARASSMENT AND THE ORGANIZATION, IT WOULD REMAIN PART OF IT.

27          Q       WHEN HE'S TOLD YOU ~~ABOUT~~ THE HARASSMENT, WHAT  
28          HAVE YOU DONE TO CHECK OUT TO DETERMINE IF THE HARASSMENT

1 ACTUALLY OCCURRED?

2 A SIR, IN MY BUSINESS, MY ASSESSMENT IS OF HIS  
3 STATE OF MIND, WHAT THE MATERIAL, WHAT THE CONTACT, WHAT THE  
4 BEHAVIOR THAT HE EXPERIENCES MEANS TO HIM. AND I FELT THAT  
5 HE WAS GIVING ME AN HONEST PRESENTATION OF WHAT HE THOUGHT  
6 WAS HAPPENING TO HIM.

7 SO THAT YOU DON'T LIKE A DISTRICT ATTORNEY'S  
8 ASSISTANT YOURSELF GO OUT, LURK IN THE BUSHES AND SEE IF  
9 THERE IS SOMEONE THERE. I LISTENED AND TOOK HIS  
10 DESCRIPTIONS AND PRESENTATION.

11 Q SO THAT IF HE WAS INCORRECT EITHER BECAUSE HE  
12 WAS EXAGGERATING, EITHER BECAUSE HE WAS OUT OF TOUCH WITH  
13 REALITY OR FOR SOME OTHER REASON, IF HE WAS INCORRECT IN  
14 TELLING YOU THAT THEY WERE HARASSING HIM, THEN YOU WOULD  
15 HAVE BASED PART OF YOUR CONCLUSIONS ON INCORRECT  
16 INFORMATION; IS THAT RIGHT?

17 A IT COULD BE SO, YES, SIR. BUT IT WAS NOT MY  
18 VIEW THAT HE WAS OUT OF HIS MIND, DERANGED OR UNABLE TO TELL  
19 ME THE TRUTH. I TOOK IT AS PRETTY STRAIGHTFORWARD. BUT AS  
20 ALWAYS, AFTER SOMEBODY HAS BEEN HARASSED A LITTLE BIT, THEY  
21 MAY BECOME ABIT NERVOUS AND WORRY A BIT MORE ABOUT THINGS  
22 THAN THEY HAD PRIOR TO THE ORIGINAL HARASSMENT.

23 Q NOW, IN -- LET ME WITHDRAW THAT.

24 YOU'VE MENTIONED A FEW TIMES THAT MR. MULL  
25 SLEPT ON THE FLOOR UNDER HIS DRAWING BOARD. IS THAT  
26 SOMETHING HE TOLD YOU?

27 A YES, SIR.

28 Q AND YOU DIDN'T DO ANYTHING TO CHECK THAT OUT,

1 YOU JUST ASSUMED HE WAS CORRECT?

2 A YES, SIR. I MAY HAVE -- I CAN'T REMEMBER IF IT  
3 WAS VERIFIED BY EITHER MR. KING OR MR. TROWBRIDGE. BUT IT  
4 WAS CLEARLY ENOUGH PRESENTED BY MR. MULL AND IT SEEMED AN  
5 HONEST PRESENTATION OF HIM TRYING TO DESCRIBE HIS WORK, THE  
6 DEDICATION THAT HE HAD BEEN LED INTO HAVING AND THE  
7 DEDICATION HE HAD BEEN INDUCED TO HAVE THAT I BELIEVED HIM  
8 WHEN HE TOLD ME.

9 Q DID HE EVER TELL YOU THAT UNDER HIS DRAWING  
10 BOARD, HE HAD A BED AND THAT IS WHAT HE SLEPT ON? DID HE  
11 EVER SAY THAT?

12 A NO, SIR. HE SAID "BOARD."

13 Q I LOOKED IN YOUR NOTES AND THERE WAS SOMETHING  
14 ABOUT DIET AND I THINK YOU ALSO TESTIFIED TO SOMETHING ABOUT  
15 DIET. CAN YOU TELL US WHAT HE TOLD YOU AND WHAT YOUR  
16 FINDINGS WERE WITH RESPECT TO THE DIET THAT THE PEOPLE HAD  
17 WHILE THEY WERE AT CAMELOT?

18 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR  
19 HONOR. I THINK IT MISCHARACTERIZES THE TESTIMONY. MR. MULL  
20 DID NOT TESTIFY ABOUT OTHER PEOPLE. HE TESTIFIED ABOUT  
21 HIMSELF.

22 THE COURT: PLEASE REPHRASE YOUR QUESTION.

23 Q BY MR. KLEIN: MY QUESTION WAS WHAT DID MR.  
24 MULL TELL YOU ABOUT THE DIET THAT HE HAD WHILE HE WAS AT  
25 CAMELOT?

26 A IT WAS A VARIANT OF VEGETARIANISM. AND MR.  
27 MULL AND OTHERS CONVEYED TO ME THAT THE DIET WOULD CHANGE  
28 ARBITRARILY IN RELATION TO MRS. PROPHET'S DICTATES. THAT

1           THEY WOULD BE, FOR EXAMPLE, ON A DIET IN WHICH THEY WERE  
2           DRINKING HOT WATER WITH LEMON JUICE AND WATERMELONS AND  
3           WOULD BE ON THAT DIET FOR A NUMBER OF DAYS. AND THEN SHE  
4           WOULD TELL THEM TO TRY ANOTHER DIET. SO THAT IT WAS  
5           DIFFICULT TO GET ANY CONSISTENT PICTURE OF DIET.

6                     IT WAS THAT THE DIET TENDED TO BE VEGETARIAN,  
7           ON OCCASION SHE WOULD HAVE THEM EAT SOME PROTEIN, FISH OR  
8           FOUL, BUT THAT IT WAS PRETTY ARBITRARILY DECIDED BY HER.

9                     SO THAT MY ANSWER IS THAT THE DIET VARIED  
10          ACROSS TIME, BUT IT TENDED TO BE LOW PROTEIN ON THE WHOLE  
11          AND ARBITRARILY DESIGNED.

12                    Q       NOW, DID THE FACT THAT YOU CONCLUDED IT WAS A  
13          LOW PROTEIN DIET AND ARBITRARINESS THAT YOU HAVE JUST SPOKEN  
14          ABOUT, DID THAT HAVE ANY SIGNIFICANCE IN THE CONCLUSIONS  
15          THAT YOU REACHED?

16                    A       IT HAD SIGNIFICANCE IN THE SENSE THAT IT FIT IN  
17          WITH THE THINGS I TESTIFIED TO THIS MORNING, THE AMOUNT OF  
18          CONTROL THAT WAS HELD BY MANAGEMENT IN THIS GROUP OVER THE  
19          MEMBERS.

20                    Q       TO THE EXTENT YOU WERE TO LEARN IT WAS NOT A  
21          LOW PROTEIN DIET AND IT WAS NOT AN ARBITRARY DIET BUT A  
22          CONSISTENT VEGETARIAN DIET WITH FISH OR SOMETHING LIKE THAT  
23          ONCE IN A WHILE, TO THE EXTENT YOU LEARNED THAT, WOULD THAT  
24          IN ANY WAY AFFECT YOUR CONCLUSIONS?

25                    A       THAT WAS A COMPLICATED QUESTION. PLEASE PARE  
26          IT DOWN.

27                    Q       I WILL. TO THE EXTENT THAT YOU LEARNED THE  
28          DIET WAS AN ADEQUATE DIET, WASN'T A LOW PROTEIN DIET, WOULD

1 THAT IN ANY WAY AFFECT YOUR CONCLUSIONS?

2 A IF YOU ARE ASKING ME AS A HYPOTHETICAL?

3 Q YES.

4 A IF I WERE TO BE PROVIDED WITH SUCH INFORMATION,  
5 THAT WOULD BE INFORMATION THAT WOULD CAUSE ME TO REFLECT.  
6 BUT IT WOULD BE TOTALLY INCONSISTENT WITH WHAT I HAVE BEEN  
7 TOLD BY THESE PEOPLE TO DATE AND THAT I READ IN THE  
8 DOCUMENTS BECAUSE THOSE PEOPLE'S REPORTS AND THE DOCUMENTS  
9 TO MY REMEMBRANCE CONVEY THAT IT WAS AN ARBITRARY AND  
10 CHANGING AND PRIMARILY VEGETARIAN DIET, BUT ON OCCASION MRS.  
11 PROPHET WOULD HAVE THE INTRODUCTION OF THE PROTEINS OF THE  
12 FISH AND MEAT.

13 THE COURT: WE WILL TAKE OUR AFTERNOON RECESS AT THIS  
14 TIME.

15 (RECESS.)

16 THE COURT: PROCEED.

17 MR. KLEIN: THANK YOU, YOUR HONOR.

18 THE COURT: APPROACH THE BENCH FOR JUST A SECOND.

19 (A CONFERENCE WAS HELD AT THE BENCH  
20 WHICH WAS NOT REPORTED.)

21 Q BY MR. KLEIN: YOU LISTED A NUMBER OF  
22 CHARACTERISTICS THAT YOU WOULD FIND IN A THOUGHT REFORM  
23 PROGRAM DURING YOUR TESTIMONY ON DIRECT. WAS ONE OF THOSE,  
24 I THINK THE FIRST ONE, CONTROL OVER A PERSON'S TIME? IS  
25 THAT ACCURATE?

26 A YES, SIR.

27 Q DO YOU MEAN PHYSICALLY YOU JUST TRY TO MAKE  
28 SURE THAT YOU HAVE 24 HOURS A DAY OF HIS TIME OR AS CLOSE

1           THEREOF AS YOU CAN GET? IS THAT WHAT YOU MEAN?

2           A       NOT THAT SIMPLY. BUT AS MUCH CONTROL AS  
3           POSSIBLE OVER THE PERSON'S TIME. AND AS MY WORDING WAS, TO  
4           GAIN CONTROL OVER THEIR PHYSICAL, SOCIAL ENVIRONMENT AND/OR  
5           TIME.

6           Q       AND TO GAIN CONTROL OVER THEIR PHYSICAL AND  
7           SOCIAL ENVIRONMENT, DO YOU DO THAT BY TRYING TO GET THEM TO  
8           MOVE INTO THE CHURCH PROPERTY? IS THAT HOW YOU DO THAT?

9           A       EITHER -- WITHIN THIS ORGANIZATION, AS IT WAS  
10          POINTED OUT, IT IS A SEQUENTIAL STAGING OF INVOLVEMENT. AND  
11          AS I DESCRIBED A THOUGHT REFORM PROGRAM, THAT FIFTH FEATURE  
12          OF DOING IT A STEP AT A TIME WITH THE PEOPLE IN AN  
13          UNINFORMED STATE THAT THEY'RE BEING LED ALONG AT A STEP AT A  
14          TIME INTO A MANIPULATED SITUATION, THE REASON THAT THEY WANT  
15          IN ORDER TO GET CONTROL OVER THE PERSON TO GET MORE CONTROL  
16          OVER THEIR TIME IS SO THEN THERE CAN BE THESE OTHER  
17          INFLUENCES BROUGHT TO BEAR UPON THE PERSON.

18          Q       NOW, MR. MULL WENT TO SUMMIT UNIVERSITY FROM  
19          JANUARY TO MARCH OF 1975. HE MOVED TO CAMELOT IN JANUARY OF  
20          1979. DO YOU KNOW WHAT THIS CHURCH DID FROM MARCH OF 1975  
21          TO JANUARY OF '79 IN ORDER TO GAIN CONTROL OF MR. MULL'S  
22          TIME OR OF HIS PHYSICAL, SOCIAL ENVIRONMENT?

23          A       YES, SIR.

24          Q       WHEN DID THEY DO THAT?

25          A       THE WAY THAT IT ALL BEGAN WAS, AS WE WERE  
26          TALKING EARLIER IN 1974, A WOMAN FROM THE SAN FRANCISCO  
27          TEACHING CENTER PLUS EVENTUALLY MR. RORY INGALLS MADE  
28          THOSE ORIGINAL CONTACTS WITH MR. MULL. AND THEN

1           SUBSEQUENTLY, THERE WERE THESE VISITS BY MRS. PROPHET, MR.  
2           KING TO SAN FRANCISCO, MUCH FLATTERY PUT UPON MR. MULL.

3                         THEY GOT ACCESS TO HIS STATIONERY, TO HIS  
4           BUSINESS CARD THAT PERMITTED THE BUYING OF OBJECTS AT  
5           WHOLESALE PLACES AND SO ON SO THAT THERE WAS CONVEYED TO ME  
6           THIS GRADUAL CONTACT AND INCREASING PRESSURE BROUGHT UPON  
7           MR. MULL TO MOVE TO CAMELOT. AND THE PRESSURE THEN WAS  
8           REALLY PUT ON WHEN IT BECAME OBVIOUS TO THE PEOPLE AT C.U.T.  
9           THAT THEY NEEDED ARCHITECTS AND BUILDING DESIGNERS. AND IN  
10          MR. MULL, THEY HAD SUCH AN INDIVIDUAL.

11                        AND MORE PRESSURE, MORE COERCION, MORE OF THE  
12          THOUGHT REFORM PROGRAM WAS THEN BROUGHT INTO PLAY BECAUSE  
13          THEY HAD NEED FOR AN ARCHITECT OR BUILDING DESIGNER SUCH AS  
14          HE WAS. AND THEN HE WAS BROUGHT IN SO THAT IN JANUARY OF  
15          '79 WHEN HE MOVED DOWN, THEN THE AMOUNT OF CONTROL OVER HIS  
16          DAILY TIME WAS THEN MUCH MORE LIKELY TO BE CONTROLLED.

17                        Q       MY QUESTION IS THIS: AFTER HE FINISHED SUMMIT  
18          UNIVERSITY IN MARCH OF 1975, HE WAS ALREADY BEING  
19          MANIPULATED BY THEM; IS THAT RIGHT?

20                        A       YES, SIR. IT STARTED, AS I JUST HAVE TESTIFIED  
21          TWICE, IN 1974.

22                        Q       AND MY QUESTION IS IS IT CONSISTENT WITH YOUR  
23          CHARACTERISTICS OF A THOUGHT REFORM PROGRAM THAT IT WOULD --  
24          THAT FOUR YEARS WOULD PASS FROM '75, WHEN HE IS ALREADY  
25          UNDER THEIR CONTROL, UNTIL 1979 BEFORE HE WOULD MOVE TO  
26          CAMELOT?

27                        A       I DON'T UNDERSTAND ~~WHAT~~ YOUR QUESTION IS, SIR.

28                        Q       LET ME REPHRASE THAT. I WILL WITHDRAW THAT

1 QUESTION.

2 DO YOU KNOW OF ANY SPECIFIC THING THAT THEY  
3 SAID TO HIM OR DID TO HIM FROM 1975 TO 1979 IN ORDER TO  
4 PRESSURE HIM TO MOVE TO CAMELOT?

5 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. I THINK  
6 IT IS A MISCHARACTERIZATION OF THE TESTIMONY.

7 THE COURT: SUSTAINED.

8 THE QUESTION I THINK HE IS TRYING TO ASK IS  
9 THIS: IF IN YOUR OPINION MR. MULL WAS UNDER THE CONTROL OF  
10 THE CHURCH UNIVERSAL AND TRIUMPHANT AS EARLY AS PERHAPS  
11 1975, HOW COME HE DIDN'T MOVE TO CAMELOT FOR SOME FOUR OR  
12 FIVE YEARS AFTER THAT?

13 IS THAT YOUR QUESTION?

14 MR. KLEIN: WELL --

15 THE COURT: I THOUGHT THAT'S --

16 MR. KLEIN: NOT QUITE. I WANTED TO KNOW WHAT THEY  
17 DID DURING THOSE FIVE YEARS TO PRESSURE HIM, WHAT  
18 SPECIFICALLY THEY DID THAT SHE CONSIDERS PRESSURE, TO GET  
19 HIM TO MOVE TO CAMELOT OTHER THAN THE CONVERSATIONS IN LATE  
20 '78.

21 THE COURT: WHY DON'T YOU LET HER ANSWER MINE FIRST  
22 AND THEN YOU CAN SEE WHAT HAPPENS.

23 MR. KLEIN: GREAT. I HAVE NO PROBLEM WITH THAT.

24 THE COURT: I THINK WE CAN MOVE ALONG MORE  
25 EXPEDITIOUSLY THAT WAY.

26 THE WITNESS: NOW, YOUR QUESTION WAS -- TELL ME  
27 AGAIN. I GOT CONFUSED WITH BOTH OF YOUR QUESTIONS.

28 THE COURT: IT MAY NOT COME OUT AS WELL AS THE FIRST



1 QUESTION.

2 THE WITNESS: OKAY.

3 THE COURT: SERIOUSLY, IF IN YOUR OPINION HE WAS  
4 UNDER THE CONTROL OF THE CHURCH AS EARLY AS PERHAPS 1975, IS  
5 THERE A REASON WHY HE DID NOT ACTUALLY PHYSICALLY MOVE TO  
6 CAMELOT UNTIL SOME FOUR OR SO YEARS AFTER THAT?

7 THE WITNESS: YES.

8 THE COURT: WHAT WOULD BE THE REASON?

9 THE WITNESS: MY UNDERSTANDING WAS THAT HE WAS STILL  
10 WORKING AND FUNCTIONING EARNING VARIOUS AMOUNTS OF MONEY AS  
11 A LICENSED BUILDER IN SAN FRANCISCO AND THAT HE WAS MAKING  
12 CONTRIBUTIONS SUCH AS WHEN MR. KING AND MRS. PROPHET VISITED  
13 HIM AND THEY WERE ABLE TO INFLUENCE HIM TO GIVE THEM AN  
14 ARMOIRE, AND ANOTHER TIME THEY WERE ABLE TO GET A PAINTING  
15 AND A STATUE, AND THAT HE WAS MAKING CONTRIBUTIONS SO THAT  
16 HE WAS AFFILIATED WITH THE GROUP.

17 BUT THE PRESSURE, TO USE YOUR WORD, WHEN WAS  
18 THE PRESSURE PUT UPON HIM SO THAT THEY'D GET MORE CONTROL  
19 OVER HIS TIME, THE PRESSURE WASN'T BROUGHT TO BEAR UNTIL THE  
20 C.U.T. ORGANIZATION WAS HAVING SOME TROUBLE I GATHERED WITH  
21 SOME BUILDING CONDITIONS AND THEY NEEDED AN ARCHITECT.

22 THEY'D HIRED ONE THAT COST A GREAT DEAL OF  
23 MONEY I WAS TOLD. AND THEN IT WAS NECESSARY FOR THEM TO  
24 REALLY PUT PRESSURE ON MR. MULL TO GET HIM TO CLOSE DOWN HIS  
25 SAN FRANCISCO BUSINESS, MOVE DOWN QNTQ THE FACILITIES.

26 SO THAT UP UNTIL THAT POINT, HE HAD BEEN UNDER  
27 THEIR INFLUENCE, AND BEING INFLUENCED IN VARIOUS WAYS AND  
28 MANIPULATED IN VARIOUS WAYS. BUT WHEN THEY NEEDED AN

1 ARCHITECT, THEN THE PRESSURE WAS PUT ON TO GET THE MOVE.

2 Q BY MR. KLEIN: MY QUESTION IS PURSUANT TO YOUR  
3 THEORY, WOULDN'T YOU HAVE EXPECTED THEM TO BEGIN TO PUT THE  
4 PRESSURE ON IN 1975 TO GET HIM TO MOVE TO CAMELOT?

5 A NO, SIR. BECAUSE WHEN YOU ARE RUNNING A  
6 THOUGHT REFORM PROGRAM, YOU BECOME VERY SMOOTH AT FEELING  
7 HOW FAST OR HOW SLOWLY DO YOU NEED TO MOVE A PERSON ALONG.  
8 AND BECAUSE IT IS A KNOWLEDGEABLE INFLUENCE PROGRAM, IT WAS,  
9 AS I JUST TESTIFIED THE PRIOR PASSAGE, NOW WHEN THEIR NEED  
10 WAS GREATER TO HAVE A LICENSED BUILDING DESIGNER, THEN THE  
11 PRESSURE WAS PUT UPON TO GET THE MOVE. BUT THEY ALREADY HAD  
12 HIM HOOKED, SO TO SPEAK, INTO THE INFLUENCE SYSTEM.

13 BUT ANY INFLUENCER KNOWS THAT IF YOU COME DOWN  
14 TOO HARD TOO EARLY, THEN YOU LOOK MORE LIKE THE ENEMY RATHER  
15 THAN THE PERSON LURING THE PERSON. SO THAT MOST JOBS OF  
16 THIS TYPE OF INFLUENCE ARE DONE SLOWLY A STEP AT A TIME.  
17 AND THAT WAS THE FIFTH QUALITY I SAID NEEDED TO BE PRESENT,  
18 THE STEP AT A TIME CHANGE.

19 Q WHAT FACTS DO YOU BASE THAT CONCLUSION ON THAT  
20 THERE WAS A PLAN ON THE PART OF THIS CHURCH TO SLOWLY STEP  
21 BY STEP GET HIM TO THIS POINT WHERE THEY COULD PRESSURE HIM  
22 IN 1978?

23 A THAT WAS CONVEYED TO ME BY READING MR. KING'S  
24 DEPOSITION, AND BY READING MR. MULL'S DEPOSITION AND FROM  
25 TALKING WITH MR. KING AND MR. MULL.

26 Q AND YOU ARE AWARE THAT BOTH OF THEM HAVE  
27 LAWSUITS AGAINST THIS CHURCH?

28 A YES, SIR. I HAVE SO TESTIFIED TODAY AND IT IS

1 IN MY KNOWLEDGE.

2 Q NOW, ANOTHER ONE OF YOUR CHARACTERISTICS OF A  
3 THOUGHT REFORM PROGRAM IS THAT A PERSON FEELS POWERLESSNESS;  
4 IS THAT RIGHT?

5 A YES, SIR.

6 Q DID MR. MULL FEEL POWERLESSNESS WHEN HE WAS A  
7 MEMBER OF THE CHURCH?

8 A EVENTUALLY HE DID.

9 Q WHEN IS "EVENTUALLY"? WHEN DID HE FEEL  
10 POWERLESSNESS?

11 A WHEN HE GOT DOWN TO CAMELOT AND BEGAN TO  
12 REALIZE THEY WERE RENEGING ON THE CONTRACT THAT THEY HAD  
13 MADE AND HE HAD MOVED DOWN THERE. HE HAD PUT HIS HOUSE UP  
14 FOR SALE, THEY HAD ADVANCED HIM MONEY WHICH HAD BEEN HIS  
15 UNDERSTANDING THEY WERE GOING TO TAKE CARE OF HIS EXPENSES.

16 AND THEN THE DEAL BETWEEN C.U.T. AND HIM WAS  
17 BEING TWISTED. HE THEN FOUND THAT HE COULDN'T DO MUCH TO  
18 REALLY GET LEVERAGE WITH THEM BECAUSE HE HAD SEPARATED FROM  
19 HIS CUSTOMERS EXCEPT GOING UP THOSE TWO DAYS, YOU KNOW, THE  
20 WEEKENDS TO TRY TO MAINTAIN AND CLOSE DOWN HIS BUSINESS,  
21 THAT HE WAS CAUGHT IN A KIND OF FINANCIAL CRUNCH.

22 Q IS THE ESSENCE OF YOUR THEORY THAT SOMEWHERE  
23 ALONG THE LINE THE PERSON HAS TO FEEL POWERLESSNESS AND THEN  
24 THAT MEANS THAT YOUR THEORY IS VALID FOR THAT SITUATION?

25 A I DON'T UNDERSTAND THAT QUESTION, IT WAS NOT  
26 CLEAR.

27 Q WHAT I AM GETTING TO IS THE EVENT THAT YOU JUST  
28 DESCRIBED HAPPENED IN 1979. YOU TOLD ME HE WENT UNDER THEIR

1 CONTROL BEGINNING IN 1974.

2 IS IT ACCEPTABLE FOR YOUR THEORY THAT IT CAN  
3 TAKE FIVE YEARS BEFORE SOMEBODY FEELS POWERLESSNESS AND THEN  
4 THAT IS STILL CONSISTENT WITH THE THEORY?

5 A I WILL HAVE TO SEE IF I CAN'T ANSWER WHAT I  
6 THINK IS YOUR QUESTION.

7 A PERSON THAT IS BEING SUBJECTED TO THIS  
8 VARIETY AND INTENSITY OF INFLUENCE TECHNIQUES IS SUBJECTED  
9 TO MANY DIFFERENT ONES ALONG THE LINE. SOME OF WHICH ARE  
10 WITHIN THE PHILOSOPHICAL CONTENT OF WHAT THE PERSON IS  
11 TAUGHT.

12 AND IN THIS PARTICULAR GROUP, THE PHILOSOPHY  
13 THAT HE WAS BEING TAUGHT WAS THAT IF HE DIDN'T OBEY MRS.  
14 PROPHET'S STATEMENTS AND HER PHILOSOPHY, THAT HE WOULD LOSE  
15 HIS ASCENDANCE TO HEAVEN. MANY THINGS IN HIS BELIEF SYSTEM  
16 WERE DEPENDENT UPON HER SO THAT THERE ARE MANY FORMS OF  
17 POWERLESSNESS.

18 AND EARLIER TODAY IN THE DIRECT, I WENT THROUGH  
19 AND LISTED THERE IS SOCIAL, PHILOSOPHICAL, PSYCHOLOGICAL  
20 POWERLESSNESS. SO THAT MR. MULL EARLY ON HAD BEEN A PERSON  
21 WHO BEGAN TO TAKE IN AND BECOME DEPENDENT ON THE GOOD GRACES  
22 OF MRS. PROPHET AS SHE PRESENTED HERSELF AND THE BELIEF  
23 SYSTEM THAT SHE WAS PRESENTING.

24 AND THEN FINALLY THAT SENSE OF POWERLESSNESS OF  
25 HIM VERSUS HER PHILOSOPHY, VERSUS HIS FINANCIAL STRAITS WHEN  
26 HE GOT TO CAMELOT WERE A GRADUAL ACCRETION OF POWERLESSNESS.

27 Q DO YOU HAVE ANY EXPERTISE IN THE FIELD OF  
28 THEOLOGY?

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1 A NO, SIR. I AM HERE AS AN EXPERT IN THE FIELD  
2 OF PSYCHOLOGY.

3 Q IS THERE ANY RELATIONSHIP IN YOUR EXAMINING THE  
4 CHURCH BETWEEN THE FIELD OF THEOLOGY AND THE FIELD OF  
5 PSYCHOLOGY?

6 A SIR, I DON'T EXAMINE CHURCHES AND I DON'T  
7 EXAMINE THEOLOGY. AS A PSYCHOLOGIST, I STUDY BEHAVIOR AS IT  
8 IS SEEN, BEHAVIOR AND CONDUCT AS IT IS REPORTED TO ME.

9 Q HAVE YOU HAD ANY TRAINING IN RELIGION?

10 A YES, SIR.

11 Q HAVE YOU TAKEN ANY COURSES IN THE PSYCHOLOGY OF  
12 RELIGION?

13 A NO, SIR.

14 Q HAVE YOU STUDIED THE SOCIOLOGY OF RELIGION?

15 A YES, SIR.

16 Q WHEN DID YOU STUDY THAT?

17 A ACROSS THE YEARS I'VE BEEN A TEACHER AND  
18 STUDENT SINCE 1939.

19 Q DID YOU TAKE ANY FORMAL COURSES IN THE  
20 SOCIOLOGY OF RELIGION?

21 A YES, SIR.

22 Q WHEN DID YOU TAKE THAT?

23 A I DON'T REMEMBER.

24 MR. LEVY: YOUR HONOR, MR. KLEIN HAS JUST INDICATED  
25 TO ME A PORTION OF A DEPOSITION IN AN UNRELATED MATTER. I  
26 HAVE NO IDEA AS TO WHEN THE DEPOSITION WAS TAKEN OR  
27 OTHERWISE.

28 IT IS MY IMPRESSION THAT IT IS NOT RELEVANT AND

1 I WOULD OBJECT TO THE INCLUSION OF SOMETHING ABOUT THE STUDY  
2 OF HER RELIGION WHEN THIS WITNESS IS BROUGHT HERE AND  
3 QUALIFIED AS AN EXPERT IN PSYCHOLOGY AND BEHAVIOR AS OPPOSED  
4 TO --

5 THE COURT: I UNDERSTAND WHAT YOU ARE SAYING. TIME  
6 FOR YOU TO STOP. I AM ABOUT TO RULE IN YOUR FAVOR. NOW, IF  
7 YOU WANT TO BE HEARD FURTHER --

8 MR. KLEIN: YOUR HONOR, MAY I BE HEARD?

9 MR. LEVY: NO. I WILL QUIT NOW.

10 THE COURT: WHY DON'T YOU APPROACH THE BENCH, PLEASE.

11 (THE FOLLOWING PROCEEDINGS WERE HELD

12 AT THE BENCH:)

13 THE COURT: WHAT IS THIS?

14 MR. KLEIN: IT IS A 1985 DEPOSITION OF MARGARET  
15 SINGER IN ANOTHER CHURCH CASE.

16 THE COURT: WHERE THESE PEOPLE DID NOT HAVE A CHANCE  
17 TO EXAMINE OR CROSS-EXAMINE?

18 MR. KLEIN: JUST ONE QUESTION:

19 "HAVE YOU STUDIED THE SOCIOLOGY  
20 OF RELIGION?

21 "NO, SIR."

22 IT IS NOT A VERY COMPLEX --

23 THE COURT: WHY DON'T YOU JUST ASK HER THE QUESTION.

24 MR. KLEIN: I DID. SHE JUST SAID SHE DID.

25 THE COURT: I DON'T THINK THE QUESTION YOU ASKED --

26 MR. KLEIN: I WILL ASK IF SHE EVER SAID IN A  
27 DEPOSITION THAT SHE DID.

28 THE COURT: WHY DON'T YOU ASK HER THE QUESTION

1 SPECIFICALLY AND ACCURATELY.

2 MR. KLEIN: SURE. I WILL ASK IT EXACTLY.

3 (THE PROCEEDINGS WERE RESUMED IN OPEN  
4 COURT IN THE PRESENCE OF THE JURY.)

5 Q BY MR. KLEIN: HAVE YOU STUDIED SOCIOLOGY OF  
6 RELIGION?

7 A NOT AS A FORMAL COURSE, BUT YES THROUGH READING  
8 AND YES THROUGH ATTENDING LECTURES.

9 Q BASED ON YOUR EXPERIENCE AND TRAINING, IS IT  
10 TRUE THAT IN ANY ORGANIZATION, PEOPLE ARE GOING TO BECOME  
11 VULNERABLE TO STRESSES? IS THAT A FAIR STATEMENT?

12 A WOULD YOU PLEASE REPEAT IT FOR ME.

13 Q BASED ON YOUR EXPERIENCE AND TRAINING, IS IT  
14 TRUE THAT IN ANY ORGANIZATION, CERTAIN PEOPLE ARE GOING TO  
15 BE SUBJECTED -- ARE GOING TO BE VULNERABLE TO STRESSES? IS  
16 THAT A FAIR STATEMENT?

17 A IT IS A VERY BROAD STATEMENT. AND YES, IN ANY  
18 LARGE OR ANY ORGANIZATION, SOME PEOPLE WILL EXPERIENCE SOME  
19 STRESSES. THAT CAN BE SAID, YES, SIR.

20 Q WITH RESPECT TO YOUR CONCLUSIONS AS TO THE  
21 PERMANENT DAMAGE DONE TO GREGORY MULL, AM I CORRECT -- LET  
22 ME WITHDRAW THAT.

23 WITH RESPECT TO THE PERMANENT DAMAGES DONE TO  
24 GREGORY MULL, DID YOU DO ANY KIND OF INVESTIGATION TO  
25 DETERMINE WHAT GREGORY MULL WAS LIKE PRIOR TO 1974 WHEN HE  
26 BECAME AFFILIATED WITH THE CHURCH?

27 A YES, SIR.

28 Q WHAT DID YOU DO?

1           A       I READ THE DEPOSITIONS THAT WERE MADE AVAILABLE  
2 TO ME AND FROM THEM I LEARNED THAT HE HAD BEEN A FUNCTIONING  
3 BUILDER AND DESIGNER.

4           Q       YOU ARE TALKING ABOUT MR. MULL'S DEPOSITION?

5           A       YES, SIR.

6           Q       YOU DIDN'T DO ANY INDEPENDENT INVESTIGATION TO  
7 FIND OUT HOW SUCCESSFUL HE WAS, SAY, PRIOR TO 1974, DID YOU?

8           A       NO, SIR. I DEPENDED UPON WHAT WAS IN THE  
9 DEPOSITIONS.

10          Q       YOU DIDN'T DO ANY INVESTIGATION TO FIND OUT IF  
11 HE WAS A DEPRESSED PERSON PRIOR TO 1974, DID YOU?

12          A       NO, SIR.

13          Q       ONE OF THE THINGS YOU SAID WHEN YOU TALKED  
14 ABOUT HIS CURRENT SITUATION WAS THAT HE IS NEVER GOING TO BE  
15 ABLE TO RETURN TO HIS ARCHITECTURAL CAREER; IS THAT YOUR  
16 OPINION?

17          A       IT IS NOT ONLY MY OPINION, BUT IT HAS BEEN  
18 DEMONSTRATED BY WHAT HAS TRANSPIRED SO FAR.

19          Q       AND IS THAT SIGNIFICANT TO YOU?

20          A       YES, SIR.

21          Q       AND IN YOUR KNOWLEDGE -- TO YOUR KNOWLEDGE, WAS  
22 IT A SUCCESSFUL ARCHITECTURAL PRACTICE THAT HE HAD PRIOR TO  
23 MOVING TO CAMELOT?

24          A       WHAT DO YOU MEAN BY "SUCCESSFUL"?

25          Q       FINANCIALLY SUCCESSFUL.

26          A       AGAIN, HOW MUCH FINANCIAL SUCCESS WOULD YOU  
27 WANT?

28          Q       DID HIS BUSINESS MAKE A PROFIT PRIOR TO MOVING



1 TO CAMELOT? DO YOU KNOW THAT?

2 A SIR, I READ THE DEPOSITIONS. AND IN SOME YEARS  
3 HE HAD MADE AS MUCH AS \$60,000 A YEAR, WHICH SOUNDED TO ME  
4 LIKE A GOOD INCOME. BUT I DIDN'T HAVE OTHER INFORMATION.  
5 SO IT WILL DEPEND ON WHAT YOU THINK OF SUCCESSFUL.

6 Q YOUR FIVE-HOUR INTERVIEW WITH HIM, YOUR LAST  
7 INTERVIEW, OCCURRED IN 1985, WHICH IS ABOUT ELEVEN YEARS  
8 AFTER HE BECAME AFFILIATED WITH THE CHURCH AND ABOUT  
9 FIVE-AND-A-HALF YEARS AFTER HE LEFT THE CHURCH; IS THAT  
10 CORRECT?

11 A YES, SIR.

12 Q WOULD YOU AGREE THAT IN ORDER TO DETERMINE  
13 WHETHER SOMEONE WAS THE VICTIM OF COERCIVE PERSUASION OR  
14 NOT, THE TIME SPAN BETWEEN THE COERCIVE PERSUASION WHEN THE  
15 PSYCHOLOGIST INTERVIEWS THE PERSON IS OF SOME SIGNIFICANCE?

16 A NOT ESPECIALLY BECAUSE, YOU MUST HAVE MISSED  
17 WHAT I POINTED OUT THIS MORNING, THAT THE COERCIVE  
18 PERSUASION AND THE THOUGHT REFORM PROGRAM IS A PROPERTY OF  
19 THE ORGANIZATION. AND YOU LEARN THAT FROM THE DESCRIPTION  
20 GIVEN TO YOU BY A NUMBER OF PEOPLE WHO HAVE BEEN IN OR  
21 AFFILIATED WITH THAT GROUP.

22 SO THAT WHEN YOU SAY THAT THE ORGANIZATION HAS  
23 THOSE PROPERTIES, YOU GET THAT FROM MANY COURSES. THEN WITH  
24 MY WORK WITH MR. MULL, IT APPEARED TO ME TO THE LEVEL THAT I  
25 AM HERE-GIVING MY PROFESSIONAL OPINION, YES, HE WAS  
26 SUBJECTED TO A COERCIVE PERSUASION PROCESS.

27 Q MY QUESTION IS REGARDLESS OF WHAT THE  
28 ORGANIZATION HAS, YOU ALSO HAVE TO MAKE A DETERMINATION

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1 WHETHER THE FACTS AFFECTING MR. MULL SHOW THAT HE PERSONALLY  
2 WAS A VICTIM OF COERCIVE PERSUASION? DIDN'T YOU HAVE TO  
3 MAKE THAT ASSESSMENT?

4 A YES, SIR. AND I HAVE SO TESTIFIED I MADE THAT  
5 ASSESSMENT.

6 Q MY QUESTION IS DOES THE FACT THAT YOUR  
7 FIVE-HOUR INTERVIEW WITH HIM WHEN YOU FINALLY CAME TO YOUR  
8 CONCLUSION OCCURRED IN 1985, WHICH IS FIVE-AND-A-HALF YEARS  
9 AFTER HE LEFT THE CHURCH AND ELEVEN YEARS AFTER HE FIRST  
10 BECAME AFFILIATED WITH THE CHURCH, DOES THAT IN ANY WAY  
11 AFFECT THE VALIDITY OF YOUR CONCLUSIONS WITH RESPECT TO MR.  
12 MULL?

13 A NO, SIR.

14 Q THE TIME SEQUENCE DOESN'T MATTER AT ALL?

15 A I DON'T UNDERSTAND WHAT YOU MEAN ABOUT THE  
16 "TIME SEQUENCE." IT IS NOT CLEAR.

17 Q THE FIVE-AND-A-HALF YEARS THAT ELAPSED FROM THE  
18 TIME HE LEFT THE CHURCH TO THE TIME YOU REACHED YOUR FINAL  
19 CONCLUSION IN 1985, THAT IS THE TIME SEQUENCE, IS THAT OF  
20 ANY SIGNIFICANCE -- THAT FIVE YEARS HAVE PASSED, HIS  
21 RECOLLECTION, HIS MEMORY AS TO WHAT HE IS TELLING YOU THAT  
22 IS FIVE YEARS PRIOR THAT THE LAST PART OF IT OCCURRED, IS  
23 THAT OF ANY SIGNIFICANCE?

24 A I DON'T KNOW HOW TO ANSWER YOUR QUESTION  
25 BECAUSE I DON'T KNOW WHAT THE QUESTION IS YOU WANT ASKED.

26 Q MY QUESTION IS HAD YOU INTERVIEWED HIM IN 1980,  
27 THE WEEK AFTER HE LEFT THE CHURCH, WOULD THERE BE -- WOULD  
28 THAT IN YOUR OPINION MAKE YOUR FINDINGS AS TO WHETHER HE WAS

1 COERCIVELY PERSUADED MORE VALID, THE FACT THAT YOU  
2 INTERVIEWED HIM A WEEK AFTER HE LEFT AS OPPOSED TO FIVE  
3 YEARS AFTER HE LEFT?

4 A NO, SIR. IF HE DESCRIBED TO ME IN 1980 WHAT HE  
5 DESCRIBED IN '82, '83 AND '85 WERE ALL THE SAME, IT STILL  
6 WOULD ADD UP TO CONVEYING TO ME A PICTURE OF A THOUGHT  
7 REFORM PROGRAM AND WHAT HAD TRANSPIRED WITH HIM.

8 Q AND THAT IS MY POINT. YOU HAVE NO WAY OF  
9 KNOWING WHETHER IF YOU HAD INTERVIEWED HIM IN 1980 AND WHEN  
10 THE EVENTS WERE JUST COMPLETED WHETHER HIS STATEMENTS TO YOU  
11 WOULD HAVE BEEN THE SAME AS THEY WERE WHEN YOU WENT TO  
12 INTERVIEW HIM IN '83, '84 OR '85; ISN'T THAT RIGHT?

13 A NO, SIR. IF YOU ARE ASKING AS A PSYCHOLOGIST  
14 IF I HAD SEEN HIM RIGHT WHEN HE WAS FIRST THROWN OUT OF THE  
15 ORGANIZATION, I AM SURE I WOULD HAVE SEEN IN HIM MORE  
16 INTENSE LEVELS THAN I EVEN SEE NOW AND IN '82 AND '83 OF  
17 ANXIETY AND STRESS BECAUSE HE HAD JUST BEEN BOOTED OUT OF  
18 THIS ORGANIZATION, HAD NO MONEY AND WAS GOING BEHIND  
19 SUPERMARKETS TO GET FOOD FOR HIM AND HIS DAUGHTER.

20 SO THAT I WOULD HAVE SEEN EVEN MORE INTENSE  
21 LEVELS OF CERTAIN ASPECTS OF STRESS AT THAT TIME. AND IF HE  
22 HAD LEVELED WITH ME, HE WOULD HAVE DESCRIBED THE SAME  
23 ORGANIZATION THAT HE DESCRIBES IN '82, '83 AND '85.

24 Q THAT IS ASSUMING THAT HIS MEMORY AS THE YEARS  
25 PASSED WAS EXACTLY THE SAME AS IT WOULD HAVE BEEN IF YOU  
26 WOULD HAVE INTERVIEWED HIM RIGHT AFTER THE EVENTS HAPPENED.  
27 YOU ARE MAKING THAT ASSUMPTION, AREN'T YOU, THAT HE WOULD  
28 HAVE TOLD YOU THE SAME THING IN '80 THAT HE TOLD YOU IN '82,

1 '83 AND '85?

2 A NO, SIR. I PICK UP ON WHAT YOU JUST BROUGHT  
3 IN, THAT HIS INCREASE IN AGING AND HIS CONDITIONING IN 1985  
4 DUE TO ALL THE STRESS HE HAD SUFFERED, HE WOULD HAVE GIVEN  
5 ME MORE DETAILS THE EARLIER THAT I SAW HIM THAN HE DID GIVE  
6 ME.

7 Q THAT IS MY POINT. YOU WOULD HAVE GOTTEN MORE  
8 DETAILS HAD YOU INTERVIEWED HIM RIGHT AFTER THE EVENTS  
9 OCCURRED IN 1980?

10 A YES, SIR. AND THEY WOULD HAVE BEEN THE  
11 PRESENTING TO ME OF MORE INTENSENESS OF HIS SUFFERING, MORE  
12 INTENSENESS OF THE LIFE ANXIETY AND AGONY THAT HE WAS  
13 SUFFERING THEN.

14 SO THAT I AM WANTING TO CLARIFY THAT WHAT I  
15 WOULD HAVE SEEN AT THAT TIME WOULD HAVE BEEN A MUCH MORE  
16 INTENSE VERSION THAN HE DESCRIBES WHEN HE'S MADE SOME  
17 HANDLING OF THAT LEVEL OF ANXIETY, BUT HE WAS STILL ANXIOUS  
18 ENOUGH THAT HE THOUGHT -- SOUGHT THERAPY WITH MRS. LEVY.

19 Q YOU ARE ASSUMING THAT ALL THE FACTS AND EVENTS  
20 THAT HE RELATED TO YOU IN '82, '83 AND '85 WERE CORRECT AND  
21 THAT HE WOULD HAVE RELATED THE SAME ONES TO YOU IN 1980?  
22 ISN'T THAT THE ASSUMPTION YOU ARE MAKING?

23 A YES, SIR. BECAUSE HE IS A TRUTHFUL APPEARING  
24 MAN AND HE TRIES AS BEST HE CAN TO BE AN HONEST AND TRUTHFUL  
25 PERSON. SO I FEEL HE WOULD HAVE BEEN HONEST WITH ME NO  
26 MATTER WHEN I SAW HIM.

27 MR. KLEIN: THAT IS MY POINT. THANK YOU VERY MUCH.

28 NO FURTHER QUESTIONS, YOUR HONOR.

1 MR. LEVY: JUST A FEW, YOUR HONOR.

2 MR. KLEIN: ONE OTHER THING, YOUR HONOR. CAN WE HAVE  
3 NUMBER 109 RECEIVED IN EVIDENCE, PLEASE?

4 MR. LEVY: SUBJECT TO THIS STIPULATION, YOUR HONOR.  
5 THAT IS THE DOCTOR'S ONLY COPY. MR. KLEIN HAS SUGGESTED  
6 BEFORE THAT IF WE COULD CHECK THAT OUT, WE WILL MAKE  
7 PHOTOCOPIES.

8 THE COURT: WE WILL WORK THAT OUT. LET'S FINISH.  
9 109 IS RECEIVED.

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REDIRECT EXAMINATION

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BY MR. LEVY:

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Q MR. KLEIN ASKED YOU A NUMBER OF QUESTIONS  
ABOUT MAKING INVESTIGATIONS. THE INFORMATION SO FAR THAT  
YOU HAVE TESTIFIED TO IS THAT MR. MULL LIVED AT CAMELOT  
DURING THE YEAR '79 AND PARTIALLY DURING THE YEAR OF 1980.  
YOU FIRST SAW HIM IN 1982, YOU TESTIFIED, IN THE COURSE OF  
DOING YOUR PROFESSIONAL WORK.

DO YOU HAVE ANY CLUE AS TO HOW YOU MIGHT GO  
BACK AND INVESTIGATE HIS BED TWO YEARS AFTER HE'S KICKED OUT  
OF A PLACE?

A NO, SIR. I CAN'T CONCEIVE OF HOW YOU'D DO  
THAT.

Q NOW, HYPOTHETICALLY, I'D LIKE TO MAKE THIS  
ANALOGY AND I WANT TO FIND OUT IF IT IS CONSISTENT WITH YOUR  
THEORY OF A THOUGHT REFORM PROGRAM.

IF WE CONSIDER MR. MULL LIKE PLANTING A SEED,  
THE ACTIVITIES OF THIS ORGANIZATION -- IF WE PLANTED THAT

1 SEED, AND THEN WE NURTURED IT AND WAITED UNTIL IT RIPENED,  
2 WOULD IT BE CONSISTENT WITH YOUR THEORY OF A THOUGHT REFORM  
3 PROGRAM THAT WHEN WE NEEDED IT, WHEN IT HAD RIPENED  
4 SUFFICIENTLY, WE WOULD HARVEST IT THEN AND IT WOULD BE OUR  
5 CHOICE WHETHER WE HARVESTED IT DURING THOSE YEARS OF  
6 RIPENING AS OPPOSED TO MR. MULL'S CHOICE AS ON WHEN HE WAS  
7 HARVESTED?

8 MR. KLEIN: I WOULD OBJECT AS LEADING, YOUR HONOR.

9 THE COURT: OVERRULED.

10 THE WITNESS: THAT WAS A LONG ONE. MY FEELING WAS  
11 THAT HE LITERALLY WAS HARVESTED WHEN THE ORGANIZATION NEEDED  
12 HIM TO MOVE DOWN. THAT FROM THE BEGINNING IN 1974, HE WAS  
13 FULFILLING CERTAIN ROLES AND CERTAIN NEEDS THROUGH  
14 CONTRIBUTIONS AND PARTICIPATION BUT THAT WITH THIS THOUGHT  
15 REFORM PROGRAM ALREADY IN MOTION. THEN HE WAS, AS YOUR  
16 ANALOGY WOULD HAVE IT, PLUCKED WHEN RIPENED AND CONDITIONED  
17 BY THAT PROGRAM, THEN BROUGHT TO CAMELOT TO FULFILL THE JOBS  
18 THAT THAT ORGANIZATION NEEDED. BUT THAT HE HAD BEEN  
19 PERMITTED TO SORT OF HANG ON THE VINE UNTIL NEEDED IN THAT  
20 ROLE.

21 Q BY MR. LEVY: JUST A FEW LAST QUESTIONS.

22 NOW, CONSIDERING ALL THE HYPOTHETICALS THAT MR.  
23 KLEIN HAS ASKED YOU, IS IT STILL YOUR OPINION THAT CHURCH  
24 UNIVERSAL AND TRIUMPHANT USES A THOUGHT REFORM PROGRAM?

25 A YES, SIR.

26 Q AND CONSIDERING ALL THE HYPOTHETICALS, IS IT  
27 STILL YOUR OPINION THAT GREGORY MULL WAS VICTIMIZED BY  
28 CHURCH UNIVERSAL AND TRIUMPHANT?

1 A YES, SIR.

2 Q IS IT STILL YOUR OPINION THAT GREGORY MULL WAS  
3 PSYCHOLOGICALLY DAMAGED?

4 A YES, SIR. SEVERELY AND PERMANENTLY.

5 MR. LEVY: I HAVE NOTHING FURTHER, YOUR HONOR.

6 THE COURT: ALL RIGHT. THANK YOU VERY MUCH.

7 THE WITNESS: THANK YOU.

8 THE COURT: BE SURE TO LEAVE OUR EXHIBITS WITH US.

9 THE WITNESS: YES. I GAVE HER THAT AND THIS ONE IS  
10 ALSO YOURS. THAT IS ALL THAT I HAVE. THANK YOU, SIR.

11 THE COURT: ALL RIGHT. THANK YOU.

12 MR. LEVY: DR. SINGER, WHY DON'T YOU REMAIN THERE  
13 UNTIL THE JUDGE DISMISSES THE COURT.

14 THE WITNESS: OH, I AM SORRY.

15 THE COURT: WE ARE GOING TO STOP FOR THE DAY, LADIES  
16 AND GENTLEMEN. WE ARE GOING TO RESUME ON TUESDAY MORNING.  
17 I MENTIONED TO YOU EARLIER THAT WHEN WE STOP TODAY, WE WILL  
18 RESUME NEXT TUESDAY. TUESDAY MORNING AT 9:15. EVERYBODY BE  
19 HERE THEN READY TO PROCEED.

20 REMEMBER THE COURT'S ADMONITIONS AND HAVE A  
21 VERY PLEASANT SEVERAL DAYS.

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1 (THE FOLLOWING PROCEEDINGS WERE HELD IN  
2 OPEN COURT OUT OF THE PRESENCE OF THE JURY:)

3 THE COURT: NOW WHAT ABOUT THE EXHIBIT 109?

4 MR. LEVY: WE ARE GOING TO MAKE COPIES OF THAT, YOUR  
5 HONOR. WE ARE GOING TO CHECK IT OUT FROM LYNN. WE ARE  
6 GOING TO MAKE A COPY OF IT FOR OURSELVES AND MR. KLEIN AND  
7 THEN RETURN IT TO THE DOCTOR.

8 THE COURT: THAT IS FINE. AGREEABLE?

9 MR. KLEIN: YES.

10 THE COURT: ONE COPY FOR ME, PLEASE.

11 MR. LEVY: IF WE CAN IMPOSE UPON LYNN AND SHE HAS A  
12 COPY MACHINE.

13 THE COURT: PLAINTIFF RESTS?

14 MR. LEVY: AT THIS POINT, YOUR HONOR, YES, PLAINTIFF  
15 RESTS.

16 MR. MIDDLETON: EXCEPT FOR THE ISSUE OF THE SWORD, WE  
17 ARE RESTING. ACCORDING TO HOW THAT IS WORKED OUT HERE  
18 ACCORDING TO COUNSEL.

19 THE COURT: WHY DON'T YOU ALL DISCUSS THAT.

20 MR. KLEIN: I ALSO HAVE A MOTION TO MAKE. SHOULD I  
21 MAKE THAT TUESDAY MORNING?

22 THE COURT: THERE WON'T BE TIME TUESDAY. WHAT IS IT?

23 MR. KLEIN: I HAVE A MOTION FOR A NONSUIT ON TWO OF  
24 THE CAUSES OF ACTION.

25 THE COURT: THIS SHOULD TAKE NOT VERY MUCH TIME SO  
26 LET'S -- WHICH CAUSES OF ACTION?

27 MR. KLEIN: THE ASSAULT CAUSE OF ACTION.

28 THE COURT: WHICH OTHER CAUSE OF ACTION?



1 MR. KLEIN: AND THE QUANTUM MERUIT CAUSE OF ACTION.

2 THE COURT: DO YOU WANT TO BE HEARD VERY BRIEFLY?

3 MR. KLEIN: YES, VERY BRIEFLY.

4 WITH RESPECT TO THE ASSAULT CAUSE OF ACTION,  
5 YOUR HONOR, THE TESTIMONY IS CLEAR THAT THE EVENT HAPPENED  
6 ON THE CHURCH PROPERTY. I WOULD SUBMIT THAT THERE IS NO  
7 EVIDENCE THAT MR. MULL WAS IN IMMINENT CONCERN OR THREAT OF  
8 BEING ATTACKED.

9 (A JUROR PASSED THROUGH THE COURTROOM.)

10 THE COURT: OKAY. GO AHEAD.

11 MR. KLEIN: OKAY. MY REASON WITH RESPECT TO THE  
12 ASSAULT IS THAT THERE IS NO EVIDENCE THAT HE WAS IN IMMINENT  
13 APPREHENSION OF BEING -- OF OFFENSIVE CONDUCT TAKING PLACE.  
14 BUT TO THE EXTENT HE WAS, YOUR HONOR, IS AN ABSOLUTE  
15 PRIVILEGE.

16 HE WAS A TRESPASSER. HE WAS ON PRIVATE  
17 PROPERTY. AND WHATEVER ACTIONS HAVE OCCURRED THAT HE'S  
18 TESTIFIED TO WOULD HAVE BEEN REASONABLE UNDER THE  
19 CIRCUMSTANCES IN THAT TRESPASSER/PRIVATE PROPERTY SITUATION.

20 AND I WOULD CITE 4 WITKIN, SUMMARY OF  
21 CALIFORNIA LAW, SECTION 209, AS WELL AS THE SECTION 30.

22 DOES YOUR HONOR WANT ME TO GO ON TO QUANTUM  
23 MERUIT?

24 THE COURT: LET ME HEAR FROM OTHER COUNSEL ABOUT THE  
25 ASSAULT CAUSE OF ACTION AND THEN WE WILL GET TO THE SECOND.

26 MR. LEVY: YES, YOUR HONOR. WITH REGARD TO ASSAULT,  
27 TO GO TO THE HEART OF THE ISSUE, AN INDIVIDUAL MUST BE  
28 PLACED IN REASONABLE FEAR OF AN IMMINENT BATTERY.

1 THE COURT: WE ALL UNDERSTAND THAT. WHAT ABOUT HIS  
2 MOTION?

3 MR. LEVY: I THINK HIS MOTION IS UNSOUND FOR THE  
4 FOLLOWING REASON: MR. MULL TESTIFIED THAT HE WAS ON THE  
5 ENTRANCEWAY OF THE PROPERTY, AND HE WAS ON THAT AREA THAT  
6 PRECEDED A PODIUM OR A GUARD GATE, THAT WOULD BE AN AREA  
7 THAT WOULD BE OPEN TO THE PUBLIC, UNTIL THEY GOT TO THAT  
8 POSITION.

9 MR. MULL TESTIFIED THAT HE WAS PLACED IN FEAR  
10 BECAUSE HE KNEW OF THE ABILITY OF THE PEOPLE WHO MADE  
11 PHYSICAL MOTIONS BY RAISING THEIR HANDS AND MOVING TOWARD  
12 HIM. HIS TESTIMONY WAS THAT HE WAS REASONABLY CONCERNED FOR  
13 HIS OWN WELL-BEING AND FOR THE SAFETY OF OTHERS WITH HIM  
14 WHILE ON A PORTION OF THE PROPERTY THAT COULD BE DESCRIBED  
15 AS A PUBLIC PORTION.

16 UNDER THE TOTALITY OF THE CIRCUMSTANCES, I  
17 THINK IT FITS IN WITH EVERY DEFINITION OF ASSAULT.

18 THE COURT: LET ME ASK YOU A QUESTION. WASN'T HE  
19 THERE PURSUANT TO AN INVITATION TO THE PUBLIC TO SHOW UP?

20 MR. KLEIN: LET ME SUGGEST THIS, YOUR HONOR. HE  
21 TESTIFIED HE WENT IN ABOUT A BLOCK. IT IS A COUPLE HUNDRED  
22 FEET THAT HE WENT IN WHEN THIS INCIDENT OCCURRED AND IT WAS  
23 A SQUARE DANCE FOR THE PUBLIC.

24 HE CAME IN AND THEY SAID, "YOU CAN'T GO ANY  
25 FURTHER." HE WAS ON THEIR PROPERTY AT THE TIME. HE SAID HE  
26 WENT IN A BLOCK AND IT IS A COUPLE HUNDRED FEET WE ARE  
27 TALKING ABOUT WHEN IT OCCURRED.

28 THE COURT: MY CONCERN ABOUT IT IS THAT THERE IS AN

1 ELEMENT OF INVITATION. IT WASN'T AS IF HE HAD BEEN THROWN  
2 OUT OF A PLACE AND SAID, "I AM GOING BACK THERE AND CONFRONT  
3 THEM OR TALK WITH THEM," AND THEN HE MARCHED ONTO THE  
4 PROPERTY OF OTHER PEOPLE.

5 THIS WAS NOT THAT KIND OF A SITUATION. THE  
6 PUBLIC WAS INVITED TO COME ONTO THE PROPERTY THAT EVENING.

7 I THINK THAT THERE IS A FACTUAL ISSUE THAT THE  
8 JURY OUGHT TO DECIDE FOR THAT REASON.

9 MR. KLEIN: MAY I JUST SAY ONE MORE POINT ON THAT AND  
10 I WILL LET IT GO.

11 THE COURT: OKAY.

12 MR. KLEIN: HE CAME IN -- ALTHOUGH THE PUBLIC WAS  
13 INVITED TO A SQUARE DANCE, MR. MULL TESTIFIED HE CAME ON  
14 WITH NEWSPAPER PEOPLE AND HIS PURPOSE WAS TO MEET WITH  
15 ELIZABETH CLARE PROPHET. ALTHOUGH HE CAME AT A TIME THAT  
16 THE PUBLIC WAS INVITED, HE SAID HIS PURPOSE WAS NOT TO GO TO  
17 A SQUARE DANCE. HE SAID HE WANTED TO MEET WITH ELIZABETH  
18 CLARE PROPHET.

19 THE COURT: HE WAS HOPING TO DO THAT. I RECALL HIM  
20 TESTIFYING TO THAT EFFECT. HE WAS HOPING TO SEE THAT.

21 MR. KLEIN: THE SQUARE DANCE ASPECT SAYING THE PUBLIC  
22 CAN COME IN DOESN'T SEEM TO ME TO BE APPLICABLE.

23 THE COURT: WE ARE TALKING ABOUT TWO DIFFERENT  
24 THINGS. I THINK IT IS A JURY QUESTION.

25 MR. KLEIN: OKAY.

26 THE COURT: WHAT ABOUT QUANTUM MERUIT?

27 MR. KLEIN: WITH RESPECT TO QUANTUM MERUIT, YOUR  
28 HONOR, IN ORDER TO HAVE A RECOVERING, THERE HAS TO BE A

1 REASONABLE BELIEF THAT THE REQUESTING PARTY WILL COMPENSATE  
2 HIM FOR SERVICES. AND IN THIS CASE, MR. MULL BY HIS OWN  
3 ADMISSION STATED THAT HE NEVER DISCUSSED WITH THE CHURCH OR  
4 CHURCH OFFICIALS THEM COMPENSATING HIM IN MONEY. THEY NEVER  
5 DISCUSSED IT.

6 I THINK THAT WOULD BAR RECOVERY IN QUANTUM  
7 MERUIT IF HE NEVER DISCUSSES IT.

8 THE COURT: LET ME ASK YOU A QUESTION. WHERE THERE  
9 IS A DISCUSSION AND AN AGREEMENT, FOR EXAMPLE, "I WILL DRAW  
10 UP SOME PLANS FOR YOU IN EXCHANGE FOR \$5,000," THEN WE --  
11 THEN THERE IS NO ISSUE OF QUANTUM MERUIT ASSUMING THERE IS  
12 AN AGREEMENT. THEN THERE IS AN AN AGREEMENT. PLANS ARE  
13 PREPARED. \$5,000 IS OWING.

14 QUANTUM MERUIT COMES INTO PLAY, I BELIEVE, WHEN  
15 THERE IS A REASONABLE UNDERSTANDING AND EXPECTATION THAT  
16 REASONABLE VALUE WILL BE PAID IN THIS CASE FOR SERVICES AND  
17 THERE HAS NOT BEEN AN AGREEMENT AS TO WHAT THE AMOUNT WILL  
18 BE. IN OTHER WORDS, THE ABSENCE OF AN AGREEMENT AS TO  
19 AMOUNT TRIGGERS HERE THE ISSUE OF QUANTUM MERUIT AND WHAT IS  
20 A REASONABLE VALUE FOR THE SERVICES PERFORMED.

21 MR. KLEIN: I GUESS MY POINT IS THOUGH, AS I  
22 UNDERSTAND IT, HE WAS NEVER PROMISED HE WAS GOING TO GET ANY  
23 MONEY AND WAS NEVER PROMISED HE WAS GOING TO GET ANY MONEY  
24 FOR ANY OF THE SERVICES PERFORM.

25 I DON'T KNOW IF I AM MISSING WHAT YOUR HONOR  
26 SAYING. I SAW HIS TESTIMONY AS SAYING, "WE NEVER DISCUSSED  
27 MONEY AT ALL. I NEVER TOLD THEM I WANTED MONEY FOR THIS."  
28 THAT IS MY UNDERSTANDING OF THE TESTIMONY.

1 THE COURT: THE TESTIMONY HAS COME ACROSS WITH SOME  
2 VARIATIONS. LET ME HEAR FROM COUNSEL.

3 MR. LEVY: I WOULDN'T WANT TO CONTRADICT THE COURT  
4 BECAUSE I AM TOTALLY IN ACCORD WITH WHAT YOU ARE SAYING.  
5 THERE WAS NEVER ANY DEFINITIVE CONTRACT AGREED UPON. THERE  
6 WAS AT BEST A NEBULOUS AN AGREEMENT PREDICATED UPON NEBULOUS  
7 AGREEMENT. THERE WAS SOME UNDERSTANDING THAT MR. MULL WOULD  
8 BE COMPENSATED ACCORDINGLY.

9 I BELIEVE IT BECOMES A JURY ISSUE AS OPPOSED TO  
10 JUST A STRAIGHT BREACH OF CONTRACT ACTION BECAUSE WE DO NOT  
11 HAVE DEFINITIVE BOUNDARIES OF THE AGREEMENT. AND THEREFORE  
12 I THINK QUANTUM MERUIT DOES COME INTO PLAY, AND IT IS A JURY  
13 QUESTION AND THE QUESTION IS THE VALUE OF THE SERVICES HE  
14 PERFORMED, ESPECIALLY WHEN THEY DIDN'T EVEN MAKE A  
15 CONTRIBUTORY PAYMENT TOWARD HIM AFTER A CERTAIN PERIOD OF  
16 TIME.

17 THE COMPLAINT ADDRESSES ITSELF TO THAT PERIOD  
18 OF TIME AFTER WHICH THEY CEASED MAKING ANY PARTIAL  
19 COMPENSATION.

20 THE COURT: YOU SEE THERE HAS TO BE AN ISSUE HERE  
21 ABOUT IT BECAUSE THERE ARE SEVERAL POSSIBILITIES. ONE IS  
22 THAT HE IS TO BE PAID A FAIR PRICE FOR THE WORK THAT HE DID.  
23 THE OTHER IS THAT HE IS TO BE PAID THE AMOUNT OF THE  
24 EXPENSES THAT HE CLAIMED. THERE WAS SOME CONVERSATION ABOUT  
25 EXPENSES.

26 THE CHURCH UNIVERSAL AND TRIUMPHANT APPARENTLY  
27 TAKES YET ANOTHER VIEW BECAUSE THE CHURCH APPARENTLY TAKES A  
28 VIEW THAT HE SHOULD BE PAID ABSOLUTELY ZERO FOR THAT ENTIRE

1 PERIOD OF TIME BECAUSE THE CHURCH CLAIMS THAT THE PROMISSORY  
2 NOTES THAT MR. MULL ADMITTEDLY SIGNED IN FAVOR OF THE CHURCH  
3 REPRESENTING THE AMOUNTS OF MONEY APPARENTLY PAID BY THE  
4 CHURCH TO MR. MULL OVER THAT STRETCH OF TIME AND THOSE  
5 AMOUNTS ARE TO BE PAID BACK TO THE CHURCH, THE RESULT THEN  
6 BEING THAT MR. MULL WOULD RECEIVE ZERO DOLLARS FOR THE WORK  
7 HE DID, NOTHING FOR EXPENSES AND NOTHING FOR A FEE OR  
8 SALARY.

9 THE FACT THAT THERE WAS NO AGREEMENT AS TO THE  
10 AMOUNT OF DOLLARS TO BE PAID INDEED TRIGGERS THE ISSUE OF  
11 QUANTUM MERUIT, AND WHETHER HE WILL RECOVER OR NOT DEPENDS  
12 UPON WHETHER THE SEVERAL ELEMENTS NECESSARY TO BE PROVED TO  
13 RECOVERING QUANTUM MERUIT ARE FOUND BY THE JURY TO HAVE BEEN  
14 PROVED.

15 AND THAT IS A JURY QUESTION. I DON'T KNOW WHAT  
16 THE JURY IS GOING TO DO ABOUT THAT.

17 MR. KLEIN: MY ONLY POINT WAS TWO THINGS, AND THEN I  
18 WILL SHUT UP AND LET EVERYBODY GO HOME.

19 FIRST IS I AM SAYING IT IS MORE THAN THAT THERE  
20 WAS AN AGREEMENT ON THE AMOUNT THAT WOULD BE PAID. MY  
21 UNDERSTANDING IS THERE WAS NO AGREEMENT THAT ANY MONEY WOULD  
22 BE PAID AND THAT IS WHAT HE SAID. HE NEVER HAD ANY  
23 DISCUSSIONS WITH THEM ABOUT IT.

24 THE COURT: OH, UM-HUM. NO, SIR. THERE WAS QUITE A  
25 BIT OF TESTIMONY. WHETHER THE JURY ADOPTS IT OR NOT IS FOR  
26 THE JURY TO DETERMINE. BUT YOU AND I HEARD QUITE A BIT OF  
27 TESTIMONY THAT HE WAS TO BE PAID AT LEAST THE AMOUNT OF HIS  
28 EXPENSES.

1 "I NEED EXPENSES FOR THIS AND THAT AND THE  
2 OTHER THING, FOR MY DAUGHTER, FOR MY HOME IN SAN FRANCISCO,  
3 AND SO FORTH, AND I HAVE GOT SOME BILLS AND CREDITORS. AND  
4 I AM WORRIED ABOUT THAT AND I NEED SOME MONEY TO MEET THOSE  
5 OBLIGATIONS."

6 AND THERE IS TESTIMONY AT LEAST OF THAT NATURE.

7 MR. KLEIN: I UNDERSTAND. I AM TALKING ABOUT THAT  
8 OTHER THAN EXPENSES, THERE IS NO TESTIMONY THAT HE EXPECTED  
9 ANY OTHER MONEY. AND THAT IS MY POINT, THAT --

10 THE COURT: I AM NOT SO SURE ABOUT THAT.

11 MR. KLEIN: I THOUGHT HE SAID HE DIDN'T EXPECT TO GET  
12 ANY MONEY OTHER THAN THE EXPENSES. AND WHEN YOUR HONOR GAVE  
13 THE SITUATION AND SUMMED IT UP, IT SOUNDS CRAZY. WHY WOULD  
14 ANYBODY GO TO WORK IN THAT SITUATION?

15 BUT WE HAVE TO REMEMBER THIS WAS A SITUATION  
16 WHERE HE WAS MAKING A SERVICE TO HIS CHURCH. THAT IS WHAT  
17 HE WAS DOING AT THE TIME, SO IT IS NOT THAT --

18 MR. LEVY: IS THIS YOUR FINAL ARGUMENT?

19 MR. KLEIN: YES, THAT IS. THAT WHEN THE COURT STATED  
20 THE FACTS AND IT MIGHT SOUND GEE, WHY WOULD ANYBODY EVER  
21 WANT TO DO THAT --

22 THE COURT: I DIDN'T SAY THAT.

23 MR. KLEIN: I DIDN'T MEAN THAT THE COURT WAS  
24 SUGGESTING THAT. I AM SIMPLY SAYING THAT THE FACTS MAKES --  
25 MAKE A DIFFERENT -- COME IN A DIFFERENT PICTURE WHEN YOU  
26 REMEMBER THAT IT WAS A MAN WHO WAS SAYING, "I WILL SERVE MY  
27 CHURCH, THEREFORE I DON'T WANT ANY MONEY. JUST PAY MY  
28 EXPENSES."

1                   AND THAT IS MY ARGUMENT THAT -- AND THAT IS HOW  
2 I UNDERSTOOD THE TESTIMONY. HE THOUGHT HE WAS GOING TO GET  
3 HIS EXPENSES, BUT NEVER EXPECTED TO RECEIVE ANY MONEY FOR  
4 HIS WORK.

5                   THE COURT: ALL OF THESE ARE ISSUES I THINK THAT ARE  
6 FOR THE JURY TO DEAL WITH. BY SAYING THIS, I AM NOT  
7 SUGGESTING WHAT THE JURY WILL DO BECAUSE THERE IS A LOT OF  
8 EVIDENCE THAT HAS NOT YET BEEN RECEIVED THAT I HAVEN'T SEEN  
9 OR HEARD. AND THAT IS FOR SURE.

10                   BUT I THINK THUS FAR, I THINK THE STATE OF THE  
11 RECORD RIGHT NOW IS THAT THE MOTION SHOULD BE DENIED AND  
12 THEY ARE DENIED.

13                   MR. KLEIN: THANK YOU, YOUR HONOR.

14                   THE COURT: HOW LONG -- HOW MANY TRIAL DAYS DO WE  
15 NEED FOR YOUR CASE IN CHIEF? ALLOWING SOME TIME FOR  
16 CROSS-EXAMINATION.

17                   MR. KLEIN: CAN YOUR HONOR ASK ME THAT QUESTION  
18 TUESDAY MORNING? I THINK I CAN GIVE YOU A MUCH BETTER  
19 ANSWER AT THAT TIME.

20                   THE COURT: I WILL CONTROL MY CURIOSITY AND YOU TELL  
21 ME TUESDAY MORNING.

22                   MR. KLEIN: I WILL DO THAT.

23                   THE COURT: FAIR ENOUGH.

24                   (AT 4:00 P.M., AN ADJOURNMENT WAS TAKEN  
25 UNTIL TUESDAY, MARCH 4, 1986, AT  
26 9:15 A.M.)  
27  
28