

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

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

APPEARANCES:

FOR THE PLAINTIFF,
CROSS-DEFENDANTS AND
APPELLANTS: RIORDAN & MC KINZIE
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-AND-

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COPY

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OFFICIAL REPORTERS

1 LOS ANGELES, CALIFORNIA; TUESDAY, MARCH 4, 1986 *

2 9:30 A.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 (THE PROCEEDINGS WERE RESUMED IN OPEN
7 COURT IN THE PRESENCE OF THE JURY:)

8 THE COURT: GOOD MORNING, EVERYBODY.

9 PLEASE PROCEED.

10 MR. KLEIN: CALL JAMES MC CAFFREY, YOUR HONOR.

11
12 * D E F E N S E *

13
14 JAMES MC CAFFREY, +

15 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
16 TESTIFIES AS FOLLOWS:

17 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.
18 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL
19 YOUR FIRST AND LAST NAME.

20 THE WITNESS: JAMES MC CAFFREY. J-A-M-E-S, M-C
21 C-A-F-F-R-E-Y.

22 THE CLERK: THANK YOU.

23 MR. KLEIN: THANK YOU, YOUR HONOR.

24
25 DIRECT EXAMINATION +

26 BY MR. KLEIN:

27 Q MR. MC CAFFREY, WHERE DO YOU PRESENTLY LIVE?

28 A CHANDLER, ARIZONA.

1 Q COULD YOU GIVE US YOUR EDUCATIONAL BACKGROUND,
2 PLEASE?

3 A I HAVE A BACHELOR OF SCIENCE DEGREE IN
4 AERONAUTICAL ENGINEERING AND A BACHELOR OF SCIENCE DEGREE IN
5 BUSINESS.

6 Q ARE YOU PRESENTLY EMPLOYED?

7 A YES.

8 Q FOR WHOM DO YOU WORK?

9 A H AND R BLOCK.

10 Q HAVE YOU EVER BEEN AFFILIATED WITH EITHER
11 CHURCH UNIVERSAL AND TRIUMPHANT OR ITS PREDECESSOR, SUMMIT
12 UNIVERSITY, SUMMIT LIGHTHOUSE?

13 A YES.

14 Q WHEN DID YOU FIRST BECOME AFFILIATED WITH THIS
15 ORGANIZATION?

16 A WELL, IT WOULD HAVE BEEN IN 1967, IN PROBABLY
17 MARCH OR APRIL OR POSSIBLY EVEN MAY.

18 Q WHAT WAS THE NATURE OF YOUR AFFILIATION AT THAT
19 TIME?

20 A WELL, IT BEGAN BY WRITING A LETTER OF INQUIRY
21 TO THE SUMMIT LIGHTHOUSE.

22 Q AND DID THERE COME A TIME THAT YOU BECAME --
23 THAT YOUR AFFILIATION CHANGED FROM JUST A LETTER? DID YOU
24 ATTEND ANYTHING?

25 A WELL, I BEGAN ATTENDING CONFERENCES AT THE JULY
26 CONFERENCE OF '67.

27 Q AND DID THERE COME A TIME WHEN YOU CONSIDERED
28 YOURSELF A MEMBER OR A COMMUNICANT IN THIS CHURCH?

1 A WELL, IN FEBRUARY OF 1971, I JOINED THE STAFF
2 AT COLORADO SPRINGS.

3 Q AT THAT TIME YOU BECAME A STAFF MEMBER?

4 A YES.

5 Q AND DID THERE COME A TIME WHEN YOU BECAME A
6 MEMBER OF THE BOARD?

7 A YES. THAT WOULD HAVE BEEN IN 1972. I DON'T
8 RECALL WHICH MONTH THOUGH.

9 Q AND FOR HOW MANY YEARS WERE YOU A MEMBER OF THE
10 BOARD OF THIS CHURCH?

11 A WELL, FROM -- FROM THAT TIME IN '72 ON TILL
12 1983.

13 Q FOR HOW MANY YEARS WERE YOU A STAFF MEMBER?

14 A THE SAME, FROM '71 TO '83.

15 Q NOW, DID THERE COME A TIME WHEN YOU LEFT THE
16 CHURCH?

17 A YES. IN THE MIDDLE -- LET'S SEE. I BELIEVE
18 AUGUST OF 1983 I LEFT.

19 Q WHY DID YOU LEAVE THE CHURCH?

20 A WELL, I BEGAN HAVING -- WELL, THE DESIRE -- I
21 DON'T KNOW EXACTLY HOW TO EXPRESS IT, BUT IT WAS -- IT WAS A
22 FEELING THAT I OUGHT TO BE DOING SOMETHING ELSE. I WASN'T
23 TOTALLY SURE WHAT I SHOULD BE DOING, BUT I JUST FELT THAT I
24 SHOULD BE MOVING ON TO NEW THINGS.

25 ONCE -- ONCE THIS THOUGHT WAS KNOWN BY THE
26 CHURCH, THERE WAS THEN A MUTUAL AGREEMENT THAT IT WAS INDEED
27 BEST FOR ME TO LEAVE.

28 Q DID ANYONE THAT WAS CONNECTED WITH THE CHURCH

1 DO OR SAY ANYTHING TO PREVENT YOU FROM LEAVING IN 1983?

2 A OH, NO. NOT WHATSOEVER.

3 Q WERE YOU IN ANY WAY THREATENED OR HARASSED OR
4 INTIMIDATED AFTER YOU LEFT?

5 A NO.

6 Q DID CHURCH MEMBERS SHUN OR AVOID YOU AFTER YOU
7 LEFT?

8 A NO. NOT -- NOT AT ALL.

9 Q WHILE YOU WERE -- WITHDRAWN.
10 CURRENTLY ARE YOU AFFILIATED IN ANY WAY WITH
11 THE CHURCH?

12 A NO.

13 Q ARE YOU ON THEIR MAILING LIST?

14 A NO, I AM NOT.

15 Q DO YOU CONSIDER YOURSELF A MEMBER?

16 A NO.

17 Q WHILE YOU WERE AFFILIATED WITH THE CHURCH
18 DURING THE YEARS YOU'VE TOLD US ABOUT, CAN YOU TELL US WHAT
19 YOUR JOBS AND DUTIES WERE DURING -- THROUGH THE YEARS?

20 A HANDLING THE ACCOUNTING FUNCTIONS PRIMARILY,
21 RECORDING AND KEEPING TRACK OF THE DISBURSEMENT OF FUNDS.

22 Q DID YOU HAVE A TITLE WITH RESPECT TO THOSE
23 PARTICULAR DUTIES?

24 A IN I BELIEVE IT WAS EITHER '71 OR '72 AT SOME
25 POINT, I WAS MADE A VICE PRESIDENT OF SUMMIT LIGHTHOUSE. AT
26 APPROXIMATELY '76, I BECAME VICE PRESIDENT AND TREASURER.

27 Q AND FOR HOW LONG WERE YOU TREASURER? WHAT
28 YEARS, DO YOU RECALL?

1 A CONTINUING ON FROM THAT DATE UNTIL I LEFT IN
2 '83.

3 Q DURING THE YEARS 1979 AND 1980, DID YOU LIVE AT
4 CAMELOT?

5 A YES.

6 Q DID YOU EAT MOST OF YOUR MEALS AT CAMELOT?

7 A YES.

8 Q HOW WOULD YOU DESCRIBE THE QUALITY AND THE
9 QUANTITY OF THE FOOD THAT YOU HAD AT CAMELOT DURING THOSE
10 YEARS?

11 A WELL, THE QUANTITY WAS WHATEVER I WANTED OR
12 NEEDED, AND THE QUALITY I WOULD SAY IS AMONGST THE BEST THAT
13 IS AVAILABLE ANYWHERE.

14 Q YOU TOLD US YOU HAD A B.S. IN AERONAUTICAL
15 ENGINEER A B.S. IN BUSINESS.

16 DID YOU EVER -- WHEN YOU WENT TO COLLEGE, DID
17 YOU EVER LIVE IN A DORM?

18 A YES.

19 Q DID YOU EAT FOOD IN THE DORM?

20 A YES.

21 Q HOW WOULD YOU COMPARE THE FOOD YOU ATE AT
22 CAMELOT COMPARED WITH THE FOOD YOU ATE AT THE DORM?

23 MR. LEVY: I WOULD OBJECT. THERE IS NO EVIDENCE THAT
24 THIS MAN IS QUALIFIED AS A NUTRITIONIST.

25 THE COURT: SUSTAINED.

26 Q BY MR. KLEIN: AS FAR AS -- I WILL WITHDRAW
27 THAT.

28 AS FAR AS YOU WERE CONCERNED, WAS THE FOOD THAT

1 WAS AVAILABLE TO YOU AT CAMELOT SUFFICIENT FOR YOUR NEEDS?

2 A YES. IN FACT BECAUSE I HAD A NUMBER OF
3 ALLERGIES, THERE WOULD ALWAYS BE FOOD AVAILABLE WHICH WOULD
4 BE ON OCCASIONS DIFFERENT FROM THE PRIMARY FOOD AVAILABLE
5 BECAUSE, WELL, FOR INSTANCE EGGS, I AM ALLERGIC TO EGGS. IF
6 THEY WERE SERVING A MEAL WITH EGGS, THERE WOULD BE SOMETHING
7 AVAILABLE AS AN ALTERNATIVE.

8 Q DURING THE YEARS 1979 THROUGH 1980 WHEN YOU
9 LIVED AT CAMELOT, HOW MANY HOURS A DAY DID YOU SPEND
10 DECREEING?

11 A WELL, LET'S SEE. THERE IS PROBABLY ABOUT AN
12 HOUR AND A HALF IN THE MORNING, I THINK IT WAS AN HOUR AT
13 NOON AND IT WAS EITHER AN HOUR AND A HALF OR TWO HOURS IN
14 THE EVENING. SO THAT WOULD BE FOUR OR FIVE HOURS.

15 Q WHO DETERMINED HOW MANY HOURS YOU WOULD SPEND
16 DECREEING EACH DAY?

17 A WELL, I WOULD DETERMINE IT BASED ON OTHER
18 RESPONSIBILITIES. IF I DIDN'T HAVE TO BE DOING SOMETHING
19 ELSE, I WOULD BE AT THE DECREES.

20 Q DID YOU EVER FEEL OR DO YOU NOW FEEL THAT
21 DECREEING IN ANY WAY LESSEned YOUR ABILITY TO CONTROL YOUR
22 OWN ACTIONS AND THOUGHTS?

23 A OH, NO, NOT -- NOT WHATSOEVER. IN FACT IF
24 ANYTHING, IT MAKES YOUR -- YOUR MIND CLEARER TO SEE AND
25 THINK AND FEEL MORE CLEARLY.

26 Q DURING 1979 TO 1980, HOW MANY HOURS OF SLEEP
27 WOULD YOU GET ON A TYPICAL NIGHT WHEN YOU LIVED AT CAMELOT?

28 A I GUESS PROBABLY AROUND SEVEN HOURS.

1 Q WAS THAT SUFFICIENT FOR YOU?

2 A YES.

3 Q WHO DETERMINED HOW MANY HOURS A NIGHT YOU WOULD
4 SLEEP?

5 A I DID.

6 Q ON A TYPICAL DAY IN 1979 TO 1980 WHEN YOU LIVED
7 AT CAMELOT, HOW MANY HOURS WOULD YOU WORK?

8 A WELL, FOLLOWING THE MORNING DECREE SESSION WAS
9 EITHER 8:00 OR 8:30 WHEN YOU STARTED AND YOU WOULD GO TILL
10 NOON MEAL. AND THEN NOON DECREE SERVICE. AND THEN WORK
11 AGAIN FOLLOWING THAT UNTIL DINNER TIME. AND THEN FOLLOWING
12 THE EVENING SESSION, SOMETIMES I WOULD GO TILL ABOUT
13 PROBABLY 10:00 P.M. WOULD BE AN AVERAGE TIME.

14 Q CAN YOU GIVE US AN IDEA OF HOW MANY HOURS THAT
15 WOULD ACTUALLY BE OF WORKING? ANY IDEA?

16 A WELL, IT WOULD BE CLOSE TO AN EIGHT-HOUR DAY.

17 Q WERE THERE ANY REQUIREMENTS AS TO HOW MANY
18 HOURS YOU HAD TO WORK?

19 A NO.

20 Q WHEN YOU WERE AT CAMELOT IN 1979 TO 1980, IF A
21 PERSON WANTED TO GO OFF CAMPUS TO EAT, COULD THEY DO SO?

22 A OH, YES.

23 Q WERE THERE SOCIAL ACTIVITIES IN 1979 TO 1980
24 WHEN YOU LIVED AT CAMELOT?

25 A OH, YES. THERE WERE PERIODIC SQUARE DANCES,
26 PICNICS, BASEBALL AND OTHER ATHLETIC GAMES, HORSEBACK
27 RIDING.

28 Q DO THEY HAVE HORSES AT CAMELOT?

1 A YES, THERE WERE.

2 Q WERE THEY AVAILABLE TO PEOPLE WHO LIVED THERE
3 TO RIDE?

4 A YES. A FEW OF THEM BELONGED TO SPECIFIC
5 INDIVIDUALS THERE AND SOME BELONGED TO THE CHURCH I BELIEVE.

6 Q THE ONES THAT WERE AVAILABLE TO THE CHURCH,
7 WERE THOSE AVAILABLE FOR PEOPLE TO RIDE IF THEY WANTED?

8 A YES.

9 Q DID THEY HAVE ANY MOVIES AVAILABLE FOR PEOPLE
10 TO SEE?

11 A OH, YES. THAT WAS ONE OF THE OTHER THINGS. I
12 DON'T KNOW THAT -- IT WASN'T EVERY WEEK, BUT THERE WERE
13 PERIODICALLY ON THE WEEKENDS WE WOULD SHOW MOVIES.

14 Q YOU SAY SHOW THEM AT CAMELOT ON THE CAMPUS?

15 A AT CAMELOT, YES. WE WOULD RENT MOVIES AND
16 BRING THEM.

17 Q RENT VIDEO CASSETTES?

18 A VIDEO CASSETTES AS WELL AS ON PROJECTOR I
19 BELIEVE.

20 Q WHEN YOU LIVED IN CAMELOT FROM 1979 TO 1980,
21 DID YOU EVER GO TO SEE MOVIES AT LOCAL MOVIE THEATERS OFF
22 CAMPUS?

23 A YES.

24 Q DID YOU EVER FEEL GUILTY FOR GOING TO SEE THOSE
25 MOVIES?

26 A NO.

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

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THE COURT: OVERRULED. HE CAN ANSWER.

THE WITNESS: NO, I DID NOT FEEL GUILTY AT ALL.

Q BY MR. KLEIN: WERE THERE MOVIES THAT WERE
RECOMMENDED FOR PEOPLE TO SEE?

A YES.

Q WAS IT RECOMMENDED IN A LIST OR SOME OTHER WAY?

A I DON'T RECALL SEEING ANY LIST. WORD OF MOUTH
WAS USUALLY MUCH FASTER THAN ANY LIST ANYWAY.

Q DID YOU EVER SEE A LIST OF MOVIES THAT WERE
BANNED?

A NO.

Q WAS A TV AVAILABLE TO YOU?

A I DIDN'T HAVE ONE IN MY ROOM, BUT THERE WERE
VARIOUS NUMBERS OF TV SETS AROUND. AND SO IF, YOU KNOW, IF
THERE WAS AN OCCASION THAT I WANTED TO, I COULD GO AND WATCH
TV, YES.

Q DID YOU HAVE A RADIO?

A YES.

Q DID YOU HAVE A PHONE?

A YES.

Q WERE THERE ANY RESTRICTIONS ON CONTACT WITH
FAMILY OR FRIENDS WHO WERE NOT CHURCH MEMBERS?

A NO. IN FACT, THERE WERE OCCASIONS WHEN I WOULD
BE TOLD THAT IT WOULD BE A GOOD IDEA IF I WOULD WRITE MORE
LETTERS TO MY FAMILY.

Q WHO TOLD YOU THAT?

A ELIZABETH.

Q DID YOU IN FACT HAVE CONTACT WITH YOUR FAMILY

1 DURING THE YEARS 1979 AND 1980 WHEN YOU LIVED AT CAMELOT?

2 A YES.

3 Q WHAT KIND OF CONTACT DID YOU HAVE WITH YOUR
4 FAMILY?

5 A MORE PHONE CALLS THAN LETTERS. AND I DID -- I
6 DON'T KNOW EXACTLY WHICH YEARS, BUT THERE WERE VARIOUS TIMES
7 THAT I WENT BACK TO VISIT THEM AND THERE WERE OCCASIONS WHEN
8 ONE OR ANOTHER OF THEM WOULD COME TO VISIT ME.

9 Q BY THE WAY, WITH RESPECT TO CONTACT WITH
10 NONCHURCH MEMBERS SUCH AS YOU HAVE BEEN DESCRIBING, WAS IT
11 ANY DIFFERENT IN '79 AND '80 THAN IT HAD BEEN FROM ANY OTHER
12 TIME?

13 A NO.

14 Q DID YOU HAVE A CAR WHILE YOU WERE AT CAMELOT?

15 A YES.

16 Q WHEN YOU CAME TO CAMELOT -- WITHDRAWN.

17 WHEN YOU JOINED THE CHURCH AND BECAME A STAFF
18 MEMBER, DID YOU HAVE YOUR OWN CAR?

19 A YES. I HAD A '64 PONTIAC, WHICH AT SOME POINT
20 AFTER JOINING THE STAFF, I GAVE IT TO THE CHURCH. I
21 CONTINUED USING IT MORE OR LESS EXCLUSIVELY. IN OTHER
22 WORDS, I WAS, YOU KNOW, RESPONSIBLE FOR THE VEHICLE.

23 Q BUT AFTER YOU JOINED THE STAFF, YOU ACTUALLY
24 GAVE THE CAR TO THE CHURCH?

25 A YES.

26 Q WHEN YOU LEFT THE CHURCH, DID YOU HAVE A CAR?

27 A YES. I HAD CHANGED CARS TWICE IN BETWEEN

28 TIMES, HAD A DATSUN AND THEN ENDED UP WITH A CHEVROLET. AND

1 WHEN I LEFT, THE '78 CHEVROLET WAS GIVEN TO ME. IT WAS
2 TRANSFERRED TO MY NAME.

3 Q HOW WOULD YOU DESCRIBE YOUR FEELINGS ABOUT
4 LIVING AT CAMELOT?

5 A VERY GOOD. I ENJOYED IT.

6 Q WHILE YOU LIVED AT CAMELOT OR WHILE YOU WERE A
7 MEMBER OF THE CHURCH, WERE YOU EVER TAUGHT TO FEAR PEOPLE
8 WHO WERE NOT MEMBERS OF THE CHURCH?

9 A NO, NOT AT ALL.

10 Q DID YOU EVER HEAR OF THE CHURCH TEACHING THAT
11 TO ANYONE?

12 A NO.

13 Q WERE YOU EVER TAUGHT NOT TO COMMUNICATE WITH
14 NONMEMBERS OF THE CHURCH?

15 A NO, NOT AT ALL.

16 Q DID YOU EVER HEAR THE CHURCH TEACHING THAT TO
17 ANYONE?

18 A NO.

19 Q WERE YOU EVER TAUGHT THAT ONLY CHURCH MEMBERS
20 COULD MAKE THEIR ASCENSION AND NOT PEOPLE WHO WERE NOT
21 MEMBERS OF THE CHURCH?

22 A NO, NOT AT ALL. IT IS SOMETHING THAT IS
23 AVAILABLE TO ANYONE REGARDLESS OF THEIR RELIGIOUS
24 AFFILIATION.

25 Q WHEN YOU LIVED AT CAMELOT IN 1979 TO 1980, DID
26 YOU EVER ENGAGE IN ANY FASTING?

27 A YES.

28 Q WHO DECIDED WHETHER YOU WOULD TAKE PART IN A

1 PARTICULAR FAST?

2 A I WOULD.

3 Q WAS IT ANY DIFFERENT FOR OTHER CHURCH STAFF
4 MEMBERS AS TO WHO WOULD DECIDE?

5 A NO. EVERYONE HAD THE OPTION OF PARTICIPATING
6 ON A SPECIFIC DAY OR NOT PARTICIPATING. USUALLY DEPENDING
7 UPON HOW THEY FELT AND WHAT WORK IT WAS THEY HAD TO DO.

8 Q WERE THERE --

9 A IN OTHER WORDS, IF THEY HAD EXTRA PHYSICAL
10 ACTIVITY TO PERFORM, THEY WOULD MORE LIKELY REFRAIN FROM
11 PARTAKING OF THE FAST ON THAT OCCASION.

12 Q WHAT IF THEY JUST DIDN'T FEEL LIKE IT?

13 A THEN THEY WOULDN'T -- THEY WOULD EAT SOMETHING.
14 FOOD WAS ALWAYS AVAILABLE.

15 Q YOU TALKING ABOUT WITH RESPECT TO THE CHURCH
16 CAFETERIA, THERE WAS ALWAYS FOOD EVEN IF THERE WAS A FAST
17 GOING ON?

18 A RIGHT.

19 Q IF YOU WERE GOING TO PARTICIPATE IN A FAST, WHO
20 WOULD DECIDE WHAT FOODS OR LIQUIDS YOU WERE GOING TO PARTAKE
21 OF WHILE YOU WERE ON THE FAST? WHO WOULD DECIDE THAT?

22 A WELL, I -- I ALWAYS DID IN MY CASE AND I AM
23 SURE EVERYONE ELSE DID. NO ONE ELSE CAN UNDERSTAND YOUR
24 PARTICULAR REACTIONS TO GIVEN FOOD BETTER THAN YOU, SO YOU
25 ARE IN THE BEST POSITION TO DECIDE.

26 Q DURING YOUR YEARS WITH THE CHURCH, DID YOU HAVE
27 OCCASIONS WHEN YOU SPOKE WITH ELIZABETH CLARE PROPHET?

28 A YES.

1 Q WERE YOU EVER TAUGHT OR WAS ANYONE EVER TAUGHT,
2 TO YOUR KNOWLEDGE, THAT SHE IS GOD INCARNATE?

3 A I -- I THINK THAT USING THAT PARTICULAR PHRASE
4 WOULD PROBABLY BE EASILY MISCONSTRUED. I DON'T THINK THAT
5 WOULD BE A CORRECT INTERPRETATION OF -- OF ANY OF THE
6 TEACHINGS.

7 Q HOW WOULD YOU INTERPRET HOW SHE WAS THOUGHT OF?

8 A I WOULD SAY THAT WE WOULD CONSIDER HER A
9 REPRESENTATIVE OF GOD AND PERHAPS A HIGHER REPRESENTATIVE
10 THAN -- THAN WE WERE INDIVIDUALLY. BUT IT WAS ALSO A
11 RECOGNIZED POSSIBILITY THAT IF SHE HAD ATTAINED A GREATER
12 DEGREE OF REPRESENTING GOD, THAT THAT WAS A POSSIBILITY FOR
13 EACH OF US INDIVIDUALLY ALSO.

14 Q WERE YOU EVER TAUGHT BY THE CHURCH THAT
15 ELIZABETH CLARE PROPHET WAS PERFECT AND NEVER MAKES
16 MISTAKES?

17 A NO, NOT AT ALL.

18 Q WERE YOU TAUGHT ANYTHING IN THAT REGARD?

19 A WELL, THERE WERE A NUMBER OF OCCASIONS WHEN SHE
20 WOULD AND, BEFORE HER, MARK ALSO WOULD MAKE THE STATEMENTS,
21 "WE DO NOT -- HAVE NEVER CLAIMED TO BE PERFECT." AND THESE
22 ARE, YOU KNOW, PUBLIC STATEMENTS THAT WOULD BE MADE.

23 Q DID YOU EVER HEAR ELIZABETH CLARE PROPHET, MARK
24 PROPHET OR ANY CHURCH OFFICIAL EVER TELL ANYONE TO LIE OR
25 STEAL OR CHEAT OR DO SOMETHING THAT YOU CONSIDERED
26 DISHONEST?

27 A NO, DEFINITELY NOT.

28 Q DID YOU PERSONALLY KNOW MARK PROPHET?

1 A OH, YES.

2 Q HOW WELL DID YOU KNOW HIM?

3 A I WOULD SAY QUITE WELL. I THINK THAT WE COULD
4 BE CONSIDERED CLOSE PERSONAL FRIENDS.

5 Q DID YOU EVER HEAR HIM SAY THAT THE WAY TO
6 CONTROL STAFF MEMBERS WAS TO ALWAYS KEEP THEM BUSY?

7 A NO. THERE WAS NEVER ANY DISCUSSION OF --
8 LIKE -- OF THAT OF CONTROLLING ANYONE.

9 Q DID YOU EVER HEAR ANY DISCUSSION WHEN MARK
10 PROPHET WAS ALIVE ABOUT MANIPULATING AND CONTROLLING CHURCH
11 MEMBERS THROUGH DIET OR THROUGH SLEEP PATTERNS?

12 A NO, NOT AT ALL.

13 Q DID YOU EVER HEAR ANY DISCUSSION WHEN MARK
14 PROPHET WAS ALIVE OR AT ANY TIME DURING YOUR YEARS IN THE
15 CHURCH ABOUT MANIPULATING AND CONTROLLING STAFF MEMBERS?

16 A NO.

17 Q ARE YOU CERTAIN?

18 A ABSOLUTELY.

19 Q WE'VE HEARD EVIDENCE TO THE EFFECT THAT STAFF
20 MEMBERS, SUCH AS YOU WERE, ARE ROBOTS WHO ARE BEING
21 MANIPULATED AND CONTROLLED BY ELIZABETH CLARE PROPHET AND
22 OTHER CHURCH OFFICIALS.

23 WHEN YOU WERE A STAFF MEMBER, DID ANYONE
24 MANIPULATE AND CONTROL YOU?

25 A NO, NOT AT ALL.

26 Q ARE YOU CERTAIN OF THAT?

27 A YES, I AM TOTALLY CERTAIN.

28 Q WHEN YOU WERE A STAFF MEMBER, DID YOU BELIEVE

1 YOU HAD THE FREE WILL TO EITHER STAY WITH OR LEAVE THE
2 CHURCH AT ANY TIME YOU WANTED?

3 A YES. AND IN FACT THAT IS EXACTLY WHAT
4 HAPPENED.

5 Q WHEN YOU LEFT, WERE YOU FEARFUL THAT CHURCH
6 MEMBERS WOULD EITHER PHYSICALLY OR SPIRITUALLY DO SOMETHING
7 TO YOU?

8 A NO, NOT AT ALL.

9 Q DID YOU EVER HEAR IT SAID DURING YOUR YEARS
10 WITH THE CHURCH THAT IF YOU LEAVE THE CHURCH, YOU WON'T MAKE
11 YOUR ASCENSION?

12 A NO.

13 Q DID YOU EVER HEAR IT SAID DURING YOUR YEARS
14 WITH THE CHURCH THAT IF YOU LEAVE THE CHURCH, YOU WILL BE
15 THROUGH 10,000 YEARS OF REEMBODIMENTS?

16 A NO, NOT AT ALL.

17 Q DID YOU EVER HEAR IT SAID WHILE YOU WERE WITH
18 THE CHURCH THAT IF YOU LEAVE THE CHURCH, YOU ARE GOING TO
19 DIE?

20 A NO. IN FACT ALL THOSE POINTS ARE, YOU KNOW,
21 THEY ARE IN BASIC DISAGREEMENT WITH THE TEACHING OF THE
22 CHURCH.

23 Q WHAT WOULD THE TEACHING OF THE CHURCH BE WITH
24 RESPECT TO THOSE -- WHAT HAPPENED IF YOU LEAVE THE CHURCH?

25 A THE SPECIFIC INVOLVEMENT TO A GIVEN INDIVIDUAL
26 WITH GOD IS AN INDIVIDUAL MATTER BETWEEN THE INDIVIDUAL AND
27 GOD. AND IT IS NOT DEPENDENT UPON YOUR SPECIFIC AFFILIATION
28 WITH ANY GIVEN ORGANIZATION OTHER THAN THE GIVEN

1 ORGANIZATION MIGHT PROVIDE THE OPPORTUNITY FOR YOU TO RELATE
2 MORE CLOSELY WITH YOUR GOD.

3 AND THAT IS WHY THERE ARE MORE, YOU KNOW, A
4 NUMBER OF DIFFERENT RELIGIONS BECAUSE SOME PEOPLE FEEL MORE
5 COMFORTABLE WITH ONE WAY OF EXPLAINING GOD AND OTHER PEOPLE
6 FEEL MORE COMFORTABLE WITH ANOTHER WAY OF EXPLAINING GOD.

7 Q DURING THE YEARS WHEN YOU WERE A CHURCH STAFF
8 MEMBER LIVING AT CAMELOT, DID SOME CHURCH MEMBERS CHOOSE TO
9 LEAVE?

10 A OH, YEAH. I DON'T -- I DON'T RECALL HOW MANY,
11 BUT PERIODICALLY THERE WOULD BE PEOPLE THAT WOULD LEAVE.

12 Q ARE YOU AWARE OF ANY CHURCH MEMBERS EVER
13 HARASSING OR INTIMIDATING SOMEBODY WHO DECIDED TO JUST LEAVE
14 THE CHURCH?

15 A NO. GENERALLY THERE IS NOT MUCH CONTACT AT ALL
16 THAT I RECALL.

17 Q ARE YOU AWARE OF ELIZABETH CLARE PROPHET OR ANY
18 OTHER CHURCH OFFICIAL EVER TELLING ANY CHURCH MEMBERS TO
19 HARASS OR THREATEN OR INTIMIDATE EX-CHURCH MEMBERS?

20 A NO, NOT AT ALL.

21 Q WERE YOU ON THE STAFF IN 1980 WHEN GREGORY MULL
22 LEFT THE CHURCH?

23 A YES.

24 Q ARE YOU AWARE OF ANY CHURCH MEMBER EVER
25 HARASSING OR INTIMIDATING OR THREATENING GREGORY MULL IN ANY
26 WAY?

27 A NO, NOT AT ALL.

28 Q ARE YOU AWARE OF ANY CHURCH MEMBER EVER BEING

1 TOLD TO DO THAT, TO HARASS OR THREATEN HIM?

2 A NO, NOT AT ALL.

3 Q HAVE THERE BEEN MEETINGS OR DISCUSSIONS BY
4 CHURCH OFFICIALS AND STAFF MEMBERS ABOUT PEOPLE WHO HAVE
5 LEFT THE CHURCH?

6 A COULD YOU STATE THAT AGAIN?

7 Q YES. AFTER PEOPLE HAVE LEFT THE CHURCH, HAVE
8 THERE EVER BEEN MEETINGS OR DISCUSSIONS WHERE STAFF MEMBERS
9 HAVE SPOKEN ABOUT PEOPLE WHO HAVE LEFT THE CHURCH?

10 A THERE WOULD BE OCCASIONS WHEN THERE WOULD BE --
11 WELL, YOU MIGHT SAY UPDATES, ADVISING PEOPLE WHAT, YOU KNOW,
12 WHAT A GIVEN PERSON HAS EITHER SAID OR DONE, PARTICULARLY
13 WHEN THEY HAD SAID OR DONE SOMETHING AGAINST THE CHURCH.

14 Q WERE ANY SUCH MEETINGS OR DISCUSSIONS HELD
15 AFTER GREGORY MULL LEFT THE CHURCH ABOUT HIM?

16 A I DON'T ACTUALLY RECALL ANY SPECIFICALLY, BUT I
17 WOULD SAY THERE IS A GOOD CHANCE THERE WAS.

18 Q WERE YOU A PERMANENT STAFF MEMBER WHILE YOU
19 WERE WITH THE CHURCH?

20 A YES.

21 Q WAS IT YOUR DECISION TO DO THAT?

22 A YES.

23 Q TO YOUR KNOWLEDGE, DID ANYONE EVER PRESSURE YOU
24 IN ANY WAY TO BECOME A PERMANENT STAFF MEMBER?

25 A NO, THERE WAS NEVER ANY PRESSURE FOR ANYONE TO
26 BECOME A PERMANENT MEMBER. IF THERE WAS EVER ANY PRESSURE,
27 IT WOULD BE IN THE OTHER DIRECTION. IT WAS, YOU KNOW, IT
28 WAS -- WELL, LET'S SAY THE REQUIREMENTS WERE HIGH FOR BEING

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GIVEN THE STATUS OF PERMANENT STAFF.

Q WHY DID YOU BECOME A PERMANENT STAFF MEMBER?

A WELL, IT -- IT SEEMED TO BE THE BEST WAY TO GIVE OF MYSELF TO THE CHURCH AND THE CHURCH ACTIVITIES.

Q WHAT WERE THE YEARS THAT YOU WERE ON THE BOARD OF DIRECTORS OF THE CHURCH?

A WHAT WERE THE YEARS? FROM '72 TO '83.

Q WAS THERE AN EXECUTIVE COMMITTEE OF THE BOARD DURING THE YEARS 1978 TO 1980?

A '78 TO -- YES.

Q WERE YOU ON IT?

A YES.

Q WHO ELSE WAS ON IT?

A EDWARD FRANCIS AND MONROE SHEARER AND MYSELF.

Q DO YOU RECALL ANY DISCUSSIONS IN THAT EXECUTIVE COMMITTEE RELATING TO GREGORY MULL MOVING TO CAMELOT AND THE FINANCIAL ARRANGEMENTS THAT WERE MADE WITH HIM?

A YES. THE BASIC ARRANGEMENTS AS I RECALL WAS THAT MONIES WOULD BE ADVANCED TO GREGORY TO MEET HIS NEEDS WHILE HE WAS THERE WITH THE UNDERSTANDING THAT UPON THE SALE OF THE HOUSE, THAT HE WOULD THEN MAKE A DONATION TO THE CHURCH REIMBURSING ALL OF THOSE ADVANCES.

Q WAS THAT SUBJECT ALSO DISCUSSED IN BOARD MEETINGS?

A YES. I AM SURE THAT IT WAS.

Q WAS THERE EVER A TIME WHERE EITHER THE EXECUTIVE COMMITTEE OR THE BOARD AGREED TO PAY GREGORY MULL'S EXPENSES AND NOT BE REIMBURSED?

1 A NO, THERE WAS -- THERE WAS NEVER ANY AGREEMENT
2 OF THAT NATURE.

3 Q ARE YOU CERTAIN OF THAT?

4 A YES, ABSOLUTELY.

5 Q WAS RANDALL KING A MEMBER OF THE BOARD IN 1978
6 THROUGH 1980?

7 A NO, NOT -- NOT IN '78 ON.

8 Q WAS RAN RANDALL KING A MEMBER OF THE EXECUTIVE
9 COMMITTEE FROM 1979 TO 1980?

10 A YES.

11 Q WAS RANDALL KING PRESENT AT ANY EXECUTIVE
12 COMMITTEE MEETING FROM '79 TO '80?

13 A NO.

14 Q WAS HE PRESENT AT ANY BOARD MEETINGS FROM 1979
15 TO 1980?

16 A NO.

17 Q HOW DO YOU KNOW HE WAS NOT PRESENT AT EITHER
18 EXECUTIVE COMMITTEE OR BOARD MEETINGS?

19 A THE ONLY ONES THAT WERE PRESENT OTHER THAN
20 MEMBERS WAS IF THEY WERE BEING ASKED A QUESTION OR MAKING A
21 PRESENTATION USUALLY REQUESTING SOMETHING.

22 Q IF SOMEBODY WAS BEING ASKED A QUESTION OR
23 MAKING A PRESENTATION ON ONE TOPIC, WOULD THEY BE ALLOWED TO
24 STAY IN THE BOARD MEETING IF ANOTHER TOPIC WERE DISCUSSED?

25 A NO.

26 Q DURING THE YEARS THAT YOU WERE A MEMBER OF THE
27 BOARD, DID YOU MISS MANY MEETINGS?

28 A NO. I -- I COULDN'T SAY THE EXACT NUMBER, BUT

1 IT WOULDN'T HAVE BEEN VERY MANY THAT I EVER MISSED.

2 Q AT THE MEETINGS THAT YOU ATTENDED FROM '72 TO
3 '83 OF THE BOARD, WAS THERE EVER A DISCUSSION ABOUT
4 SOMEONE'S CLEARANCE LETTER?

5 A NO.

6 Q DID YOU EVER SEE A CLEARANCE LETTER AT ANY
7 BOARD MEETING YOU EVER WENT TO?

8 A NO. I HAVE NEVER SEEN A CLEARANCE LETTER.

9 Q HAVE YOU EVER EITHER SEEN MR. MULL'S CLEARANCE
10 LETTER OR HEARD WHAT THE CONTENTS OF HIS CLEARANCE LETTER
11 INCLUDED?

12 A NO.

13 Q DURING THE YEARS YOU WERE ON THE BOARD, WAS
14 THERE EVER ANY DISCUSSIONS ABOUT CONTROLLING OR MANIPULATING
15 CHURCH MEMBERS?

16 A NO, NONE WHATSOEVER.

17 Q DURING THE YEARS YOU WERE ON THE BOARD, WERE
18 THERE EVER ANY DISCUSSIONS ABOUT NOT GIVING CHURCH MEMBERS
19 ADEQUATE FOOD OR SLEEP SO THAT YOU COULD CONTROL THEM?

20 A NO, NOT AT ALL.

21 Q WERE THERE EVER ANY DISCUSSIONS ABOUT SLEEP AND
22 HOW MUCH SLEEP CHURCH MEMBERS WERE GETTING?

23 A I DON'T RECALL THAT EVER BEING A DISCUSSION AT
24 A BOARD MEETING, NO.

25 Q DID THE BOARD EVER HIRE A FUND RAISING
26 CONSULTANT WHILE YOU WERE A BOARD MEMBER?

27 A YES.

28 Q DO YOU KNOW IF THAT CONSULTANT HAD OTHER

1 CLIENTS BESIDES THE CHURCH?

2 A OH, YES. HE WAS A PROFESSIONAL FUND RAISER.
3 HE HAD CLIENTS THAT WERE HOSPITALS, POLITICAL PARTIES, I
4 BELIEVE EVEN, AND CANDIDATES, YOU KNOW.

5 Q DID HE HAVE OTHER CHURCHES?

6 A AND OTHER CHURCHES. JUST, YOU KNOW, HE HAD A
7 LARGE CLIENTELE.

8 Q DO YOU KNOW -- WITHDRAWN.

9 DID HE INSTRUCT THE CHURCH AND TEACH THE CHURCH
10 CERTAIN FUND RAISING TECHNIQUES?

11 A YEAH. ONE THING THAT HE TOLD US WAS THAT THE
12 MOST COMMON MISTAKE EVERYBODY MAKES IS THEY THINK THEY ARE
13 UNIQUE AND THEIR -- THEY NEED TO HAVE A SPECIAL DIFFERENT
14 WAY OF RAISING FUNDS.

15 AND HIS BASIC PHILOSOPHY IS THAT FUND RAISING
16 TECHNIQUES WORK THE SAME WHETHER YOU ARE A HOSPITAL OR A
17 CHURCH OR ANY OTHER CHARITY OR ANY OTHER, YOU KNOW, IN OTHER
18 WORDS, FUND RAISING TECHNIQUES ARE NOT DEPENDENT UPON THE
19 ORGANIZATION FOR WHICH THEY ARE RAISING THE FUNDS.

20 Q TO YOUR KNOWLEDGE, WERE THE FUND RAISING
21 TECHNIQUES THAT HE TAUGHT THE CHURCH ABOUT THE SAME ONES
22 THAT HE WAS TELLING OTHER INSTITUTIONS FOR WHOM HE WAS
23 EMPLOYED?

24 A YES.

25 Q DURING YOUR YEARS ON THE BOARD, WAS THERE EVER
26 A TIME THAT THE BOARD DECIDED TO MAKE FASTING MANDATORY IN
27 ORDER TO SAVE MONEY ON FOOD?

28 A NO.

1 Q IF FASTING WERE MADE MANDATORY ON PARTICULAR
2 DAYS, BASED ON YOUR KNOWLEDGE AS THE TREASURER OF THIS
3 ORGANIZATION, WOULD THAT HAVE RESULTED IN A COST SAVING FOR
4 THE CHURCH?

5 A I -- I THINK PROBABLY NOT. IT MIGHT EVEN
6 INCREASE THE COST SLIGHTLY BECAUSE FRESH FRUIT AND FRUIT
7 JUICES WERE CONSUMED USUALLY DURING FASTS. AND ACTUALLY
8 FRESH FRUIT IS MORE EXPENSIVE THAN THE VEGETABLES AND THINGS
9 THAT WOULD BE A NORMAL MEAL.

10 Q WITH RESPECT TO THE YEARS THAT YOU WERE ON THE
11 BOARD, DID THE BOARD MAKE BUSINESS DECISIONS AT TIMES?

12 A YES.

13 Q WITH RESPECT TO THOSE BUSINESS DECISIONS, DID
14 THE BOARD ALWAYS FOLLOW THE DICTATES OF ELIZABETH CLARE
15 PROPHET?

16 A NO. THERE WOULD BE OCCASIONS WHEN SHE WOULD
17 COME INTO A MEETING WITH A GIVEN IDEA OR CONCEPT ON A
18 BUSINESS ISSUE, AND WOULD THEN ASK FOR OUR COMMENTS AND
19 RECOMMENDATIONS, AND MANY TIMES WOULD BE CONVINCED OF A
20 DIFFERENT POINT OF VIEW.

21 THERE WERE TIMES WHEN SHE WOULD COME IN WITH
22 NO -- NO PRECONCEIVED NOTION AT ALL AND WAS BASICALLY ASKING
23 OUR ADVICE SO THAT SHE COULD FORM AN OPINION.

24 Q DO YOU RECALL IN ALL THE YEARS THAT YOU WERE ON
25 THE BOARD ELIZABETH CLARE PROPHET EVER RESOLVING A DISPUTE
26 AMONG BOARD MEMBERS AS TO WHAT COURSE OF ACTION TO TAKE BY
27 TAKING A DICTATION FROM A MASTER AND TELLING THE BOARD
28 THAT'S HOW THE MASTER WANTED THE ISSUE RESOLVED?

1 A YOU MEAN IN A BOARD MEETING?

2 Q YES.

3 A NO, NOT AT ALL.

4 Q YOU WERE TREASURER FOR THE CHURCH FROM 1976 TO
5 1983?

6 A YES.

7 Q DURING THAT PERIOD OF TIME, WERE YOU AWARE OF
8 WHAT MONIES WERE BEING PAID OUT, PAYABLES?

9 A YES. I WAS, YOU KNOW, ALWAYS CONCERNED WITH
10 THE RECORDING OF WHAT -- WHAT HAD BEEN DISBURSED.

11 Q WE'VE HEARD TESTIMONY THAT ELIZABETH CLARE
12 PROPHET AND RANDALL KING WERE GETTING 200- TO \$300,000
13 INCOME EITHER AS AN INCOME IN MONEY OR IN BENEFITS.

14 A WELL, THAT WOULD BE AN EXAGGERATION --
15 MR. LEVY: OBJECTION, YOUR HONOR. THERE IS NO
16 QUESTION PENDING. THE WITNESS IS TELLING US A STORY.

17 THE COURT: PLEASE WAIT FOR A QUESTION.

18 Q BY MR. KLEIN: IS THAT A TRUE STATEMENT?

19 A NO. IT'S AN EXAGGERATION AS FAR AS THE TOTAL
20 VALUE.

21 Q CAN YOU GIVE US AN APPROXIMATION OF HOW MUCH
22 MONEY AND BENEFITS ELIZABETH CLARE PROPHET AND RANDALL KING
23 WERE RECEIVING FROM THE CHURCH?

24 A WELL, THE MAXIMUM I THINK THAT IT WOULD HAVE
25 EVER BEEN --

26 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT IS
27 VAGUE AND AMBIGUOUS. WE DON'T HAVE A TIME FRAME IN HERE.

28 THE COURT: SUSTAINED.

1 Q BY MR. KLEIN: DURING THE YEARS '75 TO '80, CAN
2 YOU GIVE US AN APPROXIMATION AS TO WHAT THE MAXIMUM AMOUNT
3 ELIZABETH CLARE PROPHET AND RANDALL KING WOULD HAVE RECEIVED
4 FROM THE CHURCH IN MONEY AND BENEFITS?

5 A MONEY AND BENEFITS. I WOULD SAY THAT IT WOULD
6 HAVE NEVER EXCEEDED 30- TO ABSOLUTE MAXIMUM OF 50,000 PER
7 MONTH.

8 Q PER MONTH?

9 A PER YEAR. EXCUSE ME.

10 Q WE ALSO HEARD TESTIMONY THAT WHEN PEOPLE MADE
11 REQUESTS FOR MONEY FROM THE CHURCH, THAT THE CHURCH OFTEN
12 WOULD MAKE THEM WAIT BEFORE GIVING THEM THEIR MONEY IN ORDER
13 TO GET CONTROL OVER THEM. IS THAT A TRUE STATEMENT?

14 A NO, I DON'T -- I DON'T THINK THAT IS TRUE AT
15 ALL.

16 Q TO YOUR KNOWLEDGE, DID THE CHURCH PAY ITS BILLS
17 ON TIME?

18 A YES.

19 Q DID YOU EVER AS TREASURER WITHHOLD ANY PAYMENT
20 FROM MR. MULL OR ANYONE ELSE IN ORDER TO GET MORE CONTROL
21 OVER THEM?

22 A NO.

23 Q WHY ARE YOU TESTIFYING HERE TODAY?

24 A WELL, I WAS ASKED TO. I WAS ASKED BASICALLY TO
25 COME AND RELATE WHAT I KNOW OF EVENTS RELATING TO THIS
26 TRIAL. AND SO I AM PERFECTLY WILLING TO DO SO.

27 MR. KLEIN: THANK YOU VERY MUCH.

28 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

1 THE COURT: ALL RIGHT.

2 MR. LEVY: A FEW QUESTIONS, YOUR HONOR.

3

4 CROSS-EXAMINATION +

5 BY MR. LEVY:

6 Q MR. MC CAFFREY, AS I UNDERSTAND IT, YOU SAID
7 YOU WROTE A LETTER TO SUMMIT LIGHTHOUSE AND THAT WAS BACK IN
8 1967, WAS IT?

9 A '67, YEAH.

10 Q HOW OLD WERE YOU THEN?

11 A WELL, LET'S SEE. I WAS BORN IN 1938, SO ALMOST
12 30. I GUESS 29.

13 Q AND HOW LONG WAS IT AFTER YOU WROTE THE LETTER
14 THAT YOU ACTUALLY GOT INVOLVED WITH THE CHURCH?

15 A WELL, I WOULD SAY THE LETTER WAS PROBABLY
16 ANSWERED IN A WEEK OR TWO. THE NEXT CONFERENCE THAT I
17 ATTENDED WAS IN JULY. SO THAT WOULD HAVE BEEN, SAY, A
18 COUPLE OF MONTHS.

19 Q JULY, 1967?

20 A '67, RIGHT, IN JULY.

21 Q WHAT KIND OF WORK WERE YOU DOING AT THAT TIME?

22 A I WAS A TEST ENGINEER WITH LOCKHEED AIRCRAFT.

23 Q I AM GOING TO MAKE AN ASSUMPTION. I AM
24 POSSIBLY WRONG.

25 WERE YOU MARRIED AT THAT TIME?

26 A NO.

27 Q AND WHERE WAS IT THAT YOU WERE WORKING AT FOR
28 LOCKHEED?

1 A BURBANK, CALIFORNIA.

2 Q AND WHERE WAS THAT CONFERENCE AT?

3 A COLORADO SPRINGS. THEY WERE ALL IN COLORADO
4 SPRINGS BACK AT THAT POINT IN TIME.

5 Q SO YOU WROTE A LETTER, THEY ANSWERED YOUR
6 LETTER, A COUPLE OF MONTHS LATER YOU WENT TO COLORADO.

7 AND AFTER YOU WENT TO THAT CONFERENCE, HOW LONG
8 WAS IT BEFORE YOU BEGAN FULL-TIME ASSOCIATION WITH THE
9 CHURCH?

10 MR. KLEIN: I AM GOING TO OBJECT AS VAGUE AND
11 AMBIGUOUS.

12 THE COURT: I THINK HE CAN ANSWER IT.

13 THE WITNESS: WELL, I DON'T KNOW EXACTLY WHAT YOU
14 MEAN BY FULL-TIME. BUT WHEN I WAS FULL-TIME EVERY DAY WAS
15 WHEN I JOINED THE STAFF IN '71.

16 Q BY MR. LEVY: OKAY. SO THERE WOULD HAVE BEEN A
17 PERIOD OF SOME FOUR YEARS WHEN YOU WOULD JUST HAVE BEEN
18 POSSIBLY GOING TO CONFERENCES --

19 A JUST GOING TO CONFERENCES, RIGHT.

20 Q WHAT WAS IT THAT MADE YOU MAKE THE DECISION TO
21 JOIN STAFF AND GO FULL-TIME TO CHURCH UNIVERSAL, OR WAS IT
22 SUMMIT LIGHTHOUSE THEN?

23 A IT WAS SUMMIT LIGHTHOUSE AT THAT TIME.

24 IT -- IT SEEMED TO ME LIKE THAT WAS THE BEST
25 WAY THAT I COULD MAKE A CONTRIBUTION TO FULFILLING THE WILL
26 OF GOD AND THIS COUNTRY.

27 Q BETTER THAN WORKING FOR LOCKHEED?

28 A YES.

1 Q YOU DECIDED TO GO TO WORK FULL-TIME FOR GOD?
2 A YES.
3 Q DID YOU EVER ATTEND SUMMIT UNIVERSITY?
4 A NO.
5 Q NEVER DID GO TO SUMMIT UNIVERSITY?
6 A NO.
7 Q YOU TOLD US ABOUT DECREEEING SOMETIMES AS MUCH
8 AS FOUR AND FIVE HOURS A DAY, SOMETIMES FOR AN HOUR AND A
9 HALF OR MORE AT A TIME. I HAVE NEVER DECREED FOR THAT
10 LENGTH OF TIME OR FOR ANY TIME AT ALL.
11 HOW DO YOU FEEL AFTER YOU DO HIGH-SPEED DECREES
12 FOR ABOUT AN HOUR AND A HALF?
13 A WELL, I WOULDN'T SAY THERE IS ANY SIGNIFICANT
14 DIFFERENCE THAN YOU MIGHT FEEL MORE AWAKE.
15 Q YOU DON'T HYPERVENTILATE OR ANYTHING?
16 A NO, I NEVER EXPERIENCED ANYTHING LIKE THAT.
17 Q TELL ME, AT SOME OF THE CONFERENCES AND SOME OF
18 THE SEMINARS, DID YOU EVER SEE ANYBODY JUST FALL OVER AND
19 BANG THEIR HEAD ON THE TABLE BECAUSE THEY HAD BEEN DECREEEING
20 FOR AN HOUR OR MORE; AND WHEN THEY HYPERVENTILATE, THEY JUST
21 KIND OF GET A LITTLE BIT TIRED AND SLEEPY AND THEIR HEAD
22 BANGS ON THE TABLE?
23 A I HAVE NEVER SEEN THAT, NO.
24 Q NEVER HEARD OF IT?
25 A NO. THERE WERE NEVER ANY -- EXCEPT THAT WHERE
26 YOU WOULD EAT, THERE WOULD NEVER BE ANY TABLES AROUND, YOU
27 KNOW, JUST SITTING IN CHAIRS. SO THERE IS NOTHING TO --
28 IF -- EVEN IF YOU NODDED YOUR HEAD, THERE WOULD BE NOTHING

1 TO BANG IT AGAINST.

2 Q DID YOU EVER SEE ANYBODY NOD THEIR HEAD?

3 A OH, I WOULD SAY THERE ARE OCCASIONS WHEN PEOPLE
4 DO GET SLEEPY, DEPENDING ON HOW MUCH SLEEP THEY HAD.

5 Q NOW YOU HAVE GOT ME CONFUSED. DECREEING WAKES
6 YOU UP AND DECREEING MAKES OTHER PEOPLE SLEEPY?

7 A I WOULDN'T SAY THAT THAT IS WHAT MAKES THEM
8 SLEEPY. THEY WERE SLEEPY AND IT DIDN'T WAKE THEM UP ENOUGH
9 ON THOSE OCCASIONS WHEN THEY WOULD GO TO SLEEP.

10 Q WHEN YOU DID SOME DECREEING FOR A PERIOD OF
11 TIME, DID YOU FEEL LIKE IT MADE YOU RECEPTIVE?

12 A RECEPTIVE? WHAT DO YOU MEAN?

13 Q WELL, KIND OF LIKE MAYBE SOMEBODY WAS GOING TO
14 GIVE A LECTURE AFTER A DECREEING SESSION, DID YOU FEEL THAT
15 THE DECREEING MADE YOU MORE RECEPTIVE TO THE LECTURE
16 MATERIAL?

17 A NO.

18 Q DID YOU FEEL THAT DECREEING MADE YOU MORE
19 RECEPTIVE TO GOD?

20 A I WOULDN'T SAY THAT IT MADE ME ANY MORE
21 RECEPTIVE TO GOD. IT MIGHT MAKE ME FEEL CLOSER, BUT THAT
22 WAS MORE A RESULT OF MY OWN THOUGHT PROCESS OF APPROACHING
23 GOD.

24 Q NOW, ELIZABETH CLARE PROPHET TOLD US THAT
25 DECREEING FOR THOSE HOURS MAKES SOMEONE RECEPTIVE.

26 IT DIDN'T MAKE YOU RECEPTIVE, JUST MADE YOU
27 FEEL COMFORTABLE WITH GOD?

28 MR. KLEIN: I AM GOING TO OBJECT. THAT

1 MISCHARACTERIZES THE TESTIMONY, YOUR HONOR.

2 THE COURT: OVERRULED.

3 THE WITNESS: WELL, I MAY NOT UNDERSTAND EXACTLY WHAT
4 YOU MEAN BY "RECEPTIVE."

5 Q BY MR. LEVY: YOU WORKED WITH MISS PROPHET FOR
6 A LOT OF YEARS.

7 WHEN SHE WOULD SAY SOMETHING, YOU PRETTY MUCH
8 UNDERSTOOD IT, DIDN'T YOU?

9 A YEAH, I WOULD SAY SO.

10 Q AND IF SHE WAS TO SAY THAT DECREERING MAKES ONE
11 RECEPTIVE, WOULD YOU AGREE WITH THAT?

12 A WELL, I DON'T -- I CAN'T SAY THAT I REALLY
13 UNDERSTAND WHAT THE STATEMENT IS, SO THERE WOULD BE NO WAY
14 OF AGREEING OR DISAGREEING WITHOUT UNDERSTANDING WHAT WAS
15 SAID.

16 Q FOR THE BULK OF THE TIME WHEN YOU WERE WITH THE
17 CHURCH WHEN ELIZABETH GAVE AN ORDER OR GAVE A DECREE OR GAVE
18 SOME TYPE OF INSTRUCTION, YOU DIDN'T HAVE TOO MUCH TROUBLE
19 UNDERSTANDING IT THEN, DID YOU?

20 A WELL, THERE WOULD BE TIMES THAT I WOULD ASK FOR
21 CLARIFICATION AS TO WHAT WAS MEANT WHEN A STATEMENT WAS
22 MADE.

23 Q BUT FOR THE BULK OF THE TIME, WHEN SHE ISSUED
24 SOME KIND OF ORDER OR DECREE OR SOME KIND OF EDICT, YOU
25 PRETTY MUCH UNDERSTOOD IT, DIDN'T YOU?

26 A WELL, NO MORE THAN ANY STATEMENTS ANYONE ELSE
27 MAKES. GENERALLY SPEAKING I WILL UNDERSTAND WHAT SOMEONE IS
28 SAYING WHEN THEY SPEAK TO ME.

1 Q DID YOU GIVE A LITTLE BIT MORE ATTENTION TO
2 WHAT ELIZABETH SAID THAN TO WHAT OTHER PEOPLE AROUND CAMELOT
3 SAID?

4 A GIVE IT MORE ATTENTION? IS THAT WHAT YOU --

5 Q WELL, SHE WAS THE BOSS. MOST PEOPLE DO PAY
6 ATTENTION TO THE BOSS.

7 DID YOU PAY ATTENTION TO HER?

8 A YEAH.

9 Q YOU HAVE SOME KIND OF PROBLEM WITH YOUR BACK?
10 I NOTICE YOU ARE KIND OF SLOUCHING IN THE CHAIR.

11 A YES. THIS CHAIR IS NOT THE BEST SHAPE FOR MY
12 BACK.

13 Q YOU USED TO SLEEP ON THE FLOOR AT CAMELOT QUITE
14 A BIT BECAUSE OF YOUR BACK?

15 A NO. I SLEPT ON GENERALLY EITHER AN AIR OR FOAM
16 MATTRESS.

17 Q WAS EVERYBODY OUT THERE PROVIDED WITH AIR AND
18 FOAM MATTRESSES?

19 A MOST -- IT WAS FOAM MATTRESSES FOR THE MOST
20 PART. SOME WERE CONVENTIONAL MATTRESSES, BUT I FOUND THAT
21 THE AIR MATTRESS GAVE BETTER SUPPORT THAN EITHER THE FOAM OR
22 CONVENTIONAL.

23 Q NOW, YOU WERE ASKED ABOUT SOME PEOPLE HAVING
24 HORSES OUT AT CAMELOT AND YOU SAID YOU THOUGHT SOME PEOPLE
25 EVEN HAD THEIR OWN HORSES OUT THERE.

26 MR. MC CAFFREY, WERE YOU THE BUSINESS MANAGER
27 FOR CHURCH UNIVERSAL AND TRIUMPHANT?

28 A NO.

1 Q NEVER WERE THE BUSINESS MANAGER?

2 A IN 1971, I WAS THE ACTING BUSINESS MANAGER.
3 BUT THEN WHEN I BECAME A VICE PRESIDENT, I NEVER -- NEVER
4 AGAIN HAD THE TITLE OF BUSINESS MANAGER.

5 Q WAS IT YOUR PRIMARY FUNCTION TO OVERSEE THE
6 BUSINESS OF THE CHURCH?

7 A IT WAS THE PRIMARY FUNCTION TO KEEP TRACK OF
8 THE DISBURSEMENT OF FUNDS.

9 Q IF YOU WERE GOING TO PAY SOMEBODY FOR
10 SOMETHING, SAY YOU WERE GOING TO ISSUE THEM A CHECK, WOULD
11 IT BE STANDARD OPERATING PROCEDURE TO PUT ON THE CHECK WHAT
12 IT WAS YOU WERE PAYING FOR?

13 A IN GENERAL THAT WOULD BE TRUE, YEAH.

14 Q WELL, LET'S SAY --

15 A IN FACT, THERE WOULD BE A CHART OF ACCOUNTS
16 WHICH THERE WOULD BE AN ACCOUNT NUMBER THAT WOULD BE USED TO
17 KEEP TRACK OF EACH TYPE OF EXPENSE.

18 Q AND IF EACH INDIVIDUAL OUT THERE -- SAY, LIKE
19 EACH PERSON LIVING AND WORKING AT CAMELOT WOULD HAVE A
20 NUMBER?

21 A NO.

22 Q YOU JUST HAVE A NAME AND THERE WOULD BE NO
23 OTHER WAY OF IDENTIFYING THEM?

24 A NO. IT IS THE TYPE OF EXPENSE, NOT -- NOT THE
25 PERSON THAT WOULD BE KEPT TRACK OF. IN OTHER WORDS, THE
26 PURCHASE OF PAPER IS THE PURCHASE OF PAPER WHETHER IT IS
27 COMPANY A OR COMPANY B.

28 Q DO YOU KNOW WHAT NUMBER 135 STANDS FOR?

1 A WITHOUT LOOKING AT A CHART OF ACCOUNTS, I
2 DON'T -- DON'T REALLY RECALL ANY OF THE SPECIFIC NUMBERS.

3 Q YOU DID THAT FOR SOME EIGHT OR NINE YEARS. YOU
4 WERE THE TREASURER OUT THERE FOR SOME TEN OR TWELVE YEARS.
5 YOU DON'T REMEMBER WHAT 135 IS FOR?

6 A NO. THERE ARE SEVERAL HUNDRED NUMBERS FOR THE
7 CHART OF ACCOUNTS.

8 Q WHAT ABOUT C9 AG3 VF?

9 A WELL, THAT WOULD BE IN THE NUMBERING SYSTEM
10 THAT WAS UTILIZED WITH THE COMPUTER AND THE NUMBER 135 WOULD
11 HAVE BEEN A NUMBER PRIOR TO THE USE OF THE COMPUTER IN THE
12 ACCOUNTING DEPARTMENT.

13 Q I AM GOING TO SHOW YOU WHAT'S BEEN MARKED AS
14 EXHIBIT NUMBER -- LOOKS LIKE 10. WHY DON'T YOU TAKE A LOOK
15 AT THAT.

16 A OKAY. THEY ARE THE VOUCHER PART OF CHECKS.

17 Q DO THEY LOOK FAMILIAR TO YOU?

18 A YES. THEY ARE C.U.T. CHECKS.

19 Q OKAY.

20 A OR THE STUBS.

21 Q THOSE ARE THE STUBS OF CHECKS THAT WERE PAID TO
22 GREGORY MULL. NOW, YOU JUST TOLD ME A MOMENT AGO THAT ON
23 YOUR CHECKS, YOU WOULD WRITE OR MAKE SOME KIND OF INDICATION
24 AS TO WHAT THE CHECK WAS FOR.

25 DO YOU SEE ANY PLACE ON THAT FIRST ONE RIGHT
26 HERE THAT INDICATES THAT THIS IS MONEY ADVANCED AS OPPOSED
27 TO A PAYMENT?

28 MR. KLEIN: I AM GOING TO OBJECT. THAT

1 MISCHARACTERIZES THE TESTIMONY, YOUR HONOR.

2 THE COURT: OVERRULED.

3 THE WITNESS: WELL, THE DESCRIPTION COLUMN LISTS HERE
4 IS THE 135 YOU WERE REFERRING TO AND THAT WOULD BE THE
5 ACCOUNT NUMBER THAT THIS AMOUNT OF DOLLARS WOULD BE RECORDED
6 IN.

7 Q BY MR. LEVY: THAT MIGHT BE SOMETHING LIKE
8 BUILDING AND DEVELOPMENT OR PLANNING DEPARTMENT?

9 A WITHOUT LOOKING AT A CHART OF ACCOUNTS, I
10 WOULD -- I WOULD BE GUESSING.

11 Q DO YOU REMEMBER ANY OF THE DIFFERENT NUMBERS
12 AND WHAT THEY STOOD FOR? YOU WERE ONLY THERE TEN OR TWELVE
13 YEARS. WHAT ABOUT THE CHECKS THAT YOU GOT FOR YOUR PAY? DO
14 YOU REMEMBER WHAT THAT NUMBER WAS?

15 A NO.

16 Q WHAT ABOUT THE CHECKS THAT ELIZABETH GOT FOR
17 HER PAY? DO YOU REMEMBER WHAT THAT NUMBER WAS?

18 A THE ACCOUNT NUMBER FOR SALARIES WOULD HAVE ALL
19 BEEN THE SAME. I MEAN ALL SALARIES WOULD --

20 Q TAKE A LOOK THROUGH THOSE STUBS. DO YOU SEE
21 ANYWHERE ON THERE THAT -- ANYTHING UP UNTIL OCTOBER REFLECTS
22 THAT ANYTHING IS FOR OTHER THAN A PAYMENT FOR SERVICES
23 RENDERED?

24 A WELL, WITHOUT SEEING A CHART OF ACCOUNTS, I
25 CAN'T SAY WHAT THE 135 MEANS OR WHAT THE C9 AG3 GF WOULD BE.

26 Q WITH REGARD TO MY QUESTION, IS THERE ANY
27 INDICATION ON THOSE STUBS, OTHER THAN THE LAST ONE WHICH
28 INDICATES PROMISSORY NOTE, IS THERE ANYTHING THAT INDICATES

1 THEY ARE NOT, JUST FOR YOU, A STRAIGHT PAYMENT TO AN
2 INDIVIDUAL?

3 A THE ONLY INDICATION OF WHAT THEY ARE IS THIS
4 ACCOUNT NUMBER. AND WITHOUT A DEFINITION OF THAT ACCOUNT
5 NUMBER, IT DOESN'T TELL ME ANYTHING.

6 Q NOW, IN THE COURSE OF YOU BEING TREASURER OF
7 THE CHURCH, WAS IT A COMMON PRACTICE TO MAKE A LOT OF LOANS
8 TO PEOPLE?

9 A NO, THERE WERE NOT A LOT OF LOANS.

10 Q SO IF THERE WERE LOANS, IT WOULD BE SOMETHING
11 SPECIAL, WOULD IT NOT?

12 A WELL, I DON'T KNOW WHAT YOU MEAN BY
13 "SPECIAL" --

14 Q WELL, I MEAN OUTSTANDING.

15 A IT WOULD HAVE AN ACCOUNT NUMBER THAT WOULD BE
16 DIFFERENT THAN ANY OTHER ACCOUNT NUMBER.

17 Q DOES THAT NUMBER MEAN LOAN?

18 A WITHOUT SEEING A CHART OF ACCOUNTS, I DON'T
19 KNOW WHAT THE NUMBER MEANS.

20 Q NOW, YOU SAID YOU KNEW MARK PROPHET VERY WELL.
21 IT'S BEEN TESTIFIED TO THAT ON OCCASION, MARK PROPHET USED
22 TO ENJOY WORKING OFF A LITTLE STEAM BY SOME PHYSICAL
23 ACTIVITY.

24 DO YOU HAVE ANY RECOLLECTIONS OF HIM DOING SO?

25 A WELL, YEAH. IN FACT I THINK HE EVEN BELONGED
26 TO A SPA FOR A WHILE.

27 Q DID HE LIKE TO WRESTLE?

28 A WELL, WHAT YOU MIGHT CALL HORSEPLAY.

1 Q WAS THERE A TIME WHEN MARK PROPHET ON A FAIRLY
2 REGULAR BASIS USED TO TAKE THREE OR FOUR OR FIVE GUYS UP TO
3 HIS ROOM AND LIKE TO WRESTLE WITH THEM?

4 A NOT TO MY KNOWLEDGE.

5 Q YOU WEREN'T ONE OF THEM, WERE YOU?

6 A NO.

7 Q JUST GOING BACK TO THOSE STUBS FOR JUST A
8 MOMENT. IF YOU LOOK AT THE SECOND PAGE, YOU WILL SEE ON
9 THERE THAT IT INDICATES THAT A CHECK WAS FOR EITHER
10 ARCHITECTURAL WORK OR ARCHITECTURAL RENDERINGS; IS THAT
11 CORRECT?

12 A THAT IS WHAT IT SAYS HERE, YES.

13 Q AND IF THAT IS WHAT IT SAYS ON THE CHECK STUB,
14 IS IT A PRETTY GOOD BET THAT IS WHAT THE CHECK WAS PAID FOR?

15 A NO. THE ACCOUNT NUMBER -- THE COMPUTER DOESN'T
16 READ THE WORDS, IT ONLY READS THE ACCOUNT NUMBER. SO
17 ANYTHING IS RECORDED STRICTLY BY THE ACCOUNT NUMBER.

18 Q AND YOU ARE TELLING ME THAT EVEN IF -- I DON'T
19 CARE WHAT THE ACCOUNT NUMBER IS ON THERE. IF IT SAYS
20 ARCHITECTURAL RENDERINGS, THE PROBABILITIES ARE THAT THE
21 CHECK WAS NOT FOR ARCHITECTURAL RENDERINGS; IS THAT WHAT YOU
22 ARE SAYING?

23 A NO, IT IS NOT WHAT I AM SAYING. I AM SAYING
24 THAT THIS CHECK IS FOR ACCOUNT NUMBER 135 AND THIS ONE IS
25 FOR ACCOUNT NUMBER C9 AG3 VF.

26 Q WHAT I AM ASKING YOU IS WITH REGARD TO WHAT IS
27 TYPED IN ON THE CHECK WHICH SAYS ARCHITECTURAL RENDERING OR
28 ARCHITECTURAL WORKS --

1 A THE WORDS DESCRIBING IT WOULD BE SOMETHING THAT
2 THE CLERK WHO TYPED OUT THE CHECK WOULD BE WRITING FOR HIS
3 OWN -- FOR HIS OWN BENEFIT OR HIS OWN PURPOSE. IT IS THE
4 ACCOUNT NUMBER THAT DETERMINES WHERE THIS MONEY IS RECORDED,
5 YOU KNOW, HOW IT IS KEPT TRACK OF.

6 Q WHEN YOU SAY THE ACCOUNT NUMBER --

7 A AND THE CLERK MAY NOT EVEN KNOW ON A GIVEN
8 OCCASION WHAT THE EXACT -- HE WOULD BE GIVEN THE ACCOUNT
9 NUMBER TO CHARGE IT TO. AND ANYTHING OTHER THAN THE ACCOUNT
10 NUMBER WOULD BE HIS, YOU KNOW, HIS SURMISING.

11 Q HE JUST MAKE THAT UP OUT OF THE AIR AND JUST
12 PUT -- WHAT ABOUT MOTORBOATS?

13 A WHAT ABOUT WHAT?

14 Q MOTORBOATS OR FOOTBALL HELMETS. YOU DON'T SEE
15 ANYTHING ON THERE ABOUT MOTORBOATS OR FOOTBALL HELMETS, DO
16 YOU?

17 MR. KLEIN: I AM GOING TO OBJECT. IT IS
18 ARGUMENTATIVE, YOUR HONOR.

19 THE COURT: SUSTAINED.

20 Q BY MR. LEVY: ARE YOU TELLING THE COURT THAT
21 THE CLERK JUST SEEING THE NUMBER 135 WOULD JUST DECIDE TO
22 PUT DOWN ARCHITECTURAL RENDERINGS BECAUSE THE CLERK FELT
23 LIKE IT?

24 A YOU'D HAVE TO ASK THE CLERK.

25 Q BUT YOU AS THE TREASURER, YOU WOULDN'T KNOW,
26 RIGHT?

27 A I WOULD BE CONCERNED THAT THE ACCOUNT NUMBER
28 WAS THE CORRECT ACCOUNT NUMBER.

1 THE COURT: IT WOULD BE A PRETTY SAFE BET, WOULD IT
2 NOT, THAT ACCOUNT NUMBER 135 IS NOT FOR TELEPHONE EXPENSES?

3 THE WITNESS: IT WOULD SEEM LOGICAL SINCE IT IS
4 GROUPED WITH THESE OTHER CHECKS, I WOULD GUESS THAT THEY ARE
5 PAYMENTS TO GREGORY.

6 THE COURT: IT WOULD BE A PRETTY SAFE BET, WOULD IT
7 NOT, THAT ACCOUNT NUMBER 135 IS NOT FOR OFFICE SUPPLIES?

8 THE WITNESS: WITHOUT SEEING A CHART OF ACCOUNTS, I
9 WOULDN'T DRAW ANY CONCLUSION. I MEAN THE NUMBER 135 IS VERY
10 SIMILAR TO THE NUMBER 281. BUT THEY ARE SIMPLY TWO
11 DIFFERENT ACCOUNT NUMBERS.

12 AND THEY ARE JUST SIMPLY NUMBERS, YOU KNOW.
13 THE NUMBER ITSELF DOESN'T MEAN ANYTHING OTHER THAN THE LIST
14 WOULD BE NUMBERED WITH NUMBERS. AND WITHOUT SEEING THE
15 ACTUAL DEFINITION, YOU KNOW, IT IS A COMPLETELY ABSTRACT --
16 IT IS JUST A NUMBER.

17 THE COURT: AFTER LOOKING AT THESE STUBS, DO YOU
18 THINK THERE IS ANY POSSIBILITY THAT ACCOUNT NUMBER 135 IS
19 FOR TELEPHONE EXPENSES?

20 THE WITNESS: I WOULD --

21 MR. KLEIN: YOUR HONOR, WITH ALL DUE RESPECT, I WOULD
22 OBJECT. IT SEEMS LIKE IT IS JUST SPECULATION AT THIS POINT.

23 THE COURT: YOU CAN ANSWER.

24 THE WITNESS: WHAT EXACTLY WAS THE QUESTION?

25 THE COURT: DO YOU THINK THERE IS ANY CHANCE AT ALL
26 THAT ACCOUNT NUMBER 135 IS THE ACCOUNT FOR TELEPHONE
27 EXPENSES?

28 THE WITNESS: IT WOULD SEEM TOTALLY IRRELEVANT TO ME

1 TO SPECULATE ON WHAT IT MIGHT MEAN WITHOUT SEEING A CHART OF
2 ACCOUNT DEFINITIONS. AN ACCOUNT NUMBER WAS NEVER ASSIGNED
3 TO A GIVEN CHECK WITHOUT CHECKING TO SEE WHAT NUMBER IT
4 OUGHT TO BE RECORDED AS.

5 AND AT THE TIME THAT THE REQUEST FOR THIS CHECK
6 WAS MADE, IT WOULD HAVE BEEN LOOKED ON THE CHART, AND SAID
7 IT IS THIS NUMBER, AND THEN THAT NUMBER WOULD BE WRITTEN
8 DOWN AND THEN THE DISBURSEMENT WOULD BE RECORDED UNDER THAT
9 NUMBER.

10 THE COURT: GO AHEAD.

11 MR. LEVY: THANK YOU, YOUR HONOR.

12 Q MR. MC CAFFREY, YOU TOLD US THAT IT WAS A
13 MUTUAL AGREEMENT WHEN YOU LEFT THE CHURCH?

14 A UH-HUH.

15 Q NOW, YOU WERE IN ONE WAY OR ANOTHER AFFILIATED
16 FROM 1967 TO 1983; IS THAT CORRECT?

17 A UH-HUH.

18 Q DO YOU HAVE A RELIGIOUS AFFILIATION AT THE
19 PRESENT TIME?

20 A NO, I GUESS NOT.

21 Q DID YOUR EXPERIENCE WITH THE CHURCH FULFILL ALL
22 OF YOUR RELIGIOUS NEEDS FOR ALL TIME? WAS IT THAT SOUL
23 SATISFYING?

24 A WELL, I COULDN'T SAY FOR ALL TIME. BUT I CAN
25 ONLY SAY FOR CURRENT, IT -- THAT THERE IS NO OTHER -- I AM
26 NOT SEARCHING FOR ANYTHING ELSE.

27 Q WOULD IT BE FAIR TO SAY THAT YOU HAD YOUR FILL
28 OF RELIGION FOR A PERIOD OF TIME, YOU JUST DON'T NEED

1 ANYMORE NOW?

2 A NO, I WOULDN'T -- I WOULDN'T SAY THAT WOULD BE
3 AN ACCURATE PORTRAYAL AT ALL.

4 Q YOU STILL BELIEVE IN THE TEACHINGS OF THE
5 CHURCH UNIVERSAL AND TRIUMPHANT?

6 A YES.

7 Q WHY IS IT THEN THAT YOU ARE NOT EVEN ON THE
8 MAILING LIST NOW TO GET ALL THEIR BULLETINS AND THEIR PEARLS
9 AND ALL THE RELIGIOUS INFORMATION THEY DISSEMINATE?

10 A IT DOESN'T APPEAR TO ME AS THOUGH IT IS A
11 REQUIREMENT OR A NECESSITY FOR ME AT THIS TIME.

12 Q SIXTEEN YEARS AND YOU'VE HAD IT, HUM?

13 A I WOULDN'T SAY THAT IS A DESCRIPTION, NO.

14 Q NOW, YOU SEEM -- YOU WORK FOR H AND R BLOCK
15 NOW, DO YOU?

16 A YES.

17 Q YOU KNOW QUITE A BIT ABOUT THE FACTS AND
18 FIGURES AND RECORDING DETAILS, DO YOU?

19 A I DON'T REALLY RECORD ANY DETAILS OTHER THAN
20 FILLING OUT TAX RETURNS. YOU ASK THE CLIENT QUESTIONS, AND
21 THEY GIVE YOU ANSWERS AND YOU WRITE THEM DOWN. IF THAT IS
22 WHAT YOU MEAN, THAT IS --

23 Q YES, THAT IS MORE OR LESS WHAT I MEAN.

24 NOW, I KNOW THIS MIGHT SEEM LIKE A STRANGE
25 QUESTION TO YOU, BUT WHEN YOU WERE THE BUSINESS MANAGER WAY
26 BACK AROUND THE TIME THAT GREGORY MULL WENT TO SUMMIT
27 UNIVERSITY, YOU KNOW WHAT THE PRICE OF APPLES BY THE BUSHEL
28 WAS THEN?

1 A NO. I WAS -- I DID NOT PURCHASE THE FOOD.

2 Q WELL NOW, YOU MADE A STATEMENT TO US THAT IT
3 WAS MORE EXPENSIVE WHEN PEOPLE FASTED THAN WHEN THEY WERE
4 JUST FED REGULARLY.

5 IF YOU DIDN'T PURCHASE THE FOOD, WAS THAT JUST
6 YOUR OPINION OR JUST A GUESS OR JUST WHERE DID YOU GET THAT
7 INFORMATION?

8 A WELL, I WOULD HAVE -- IF NOT DAILY, EVERY TWO
9 OR THREE DAY DISCUSSIONS WITH THE PURCHASE -- WITH THE
10 PERSON WHO DID DO FOOD PURCHASING. AND THEY WOULD ALWAYS
11 KEEP ME APPRISED OF WHERE THEY WOULD RECOMMEND THEY BUY
12 WHICH ITEMS, AND IT WAS, YOU KNOW, TO SOME DEGREE BASED ON
13 AVAILABILITY AND TO SOME DEGREE BASED ON THE PRICE.

14 Q AND --

15 A AND I WOULD QUIZ THEM AS TO WHO HAD THE BEST
16 PRICE AND THE VARIOUS FACTORS.

17 Q AND WHAT YOU ARE TELLING US IS THAT IF AT
18 SUMMIT UNIVERSITY THE STUDENTS THERE DIDN'T EAT FOR MAYBE
19 SEVEN DAYS OUT OF THE MONTH, ONE DAY A WEEK PLUS THREE DAYS
20 A MONTH, IF THEY DIDN'T EAT AND THEY JUST GOT BY ON JUST
21 WITH MAYBE A PIECE OF FRUIT NOW AND THEN, THAT IT WOULD COST
22 MORE FOR THAT THAN IT WOULD COST FOR REGULAR MEALS; IS THAT
23 WHAT YOU ARE SAYING?

24 MR. KLEIN: I WOULD OBJECT. THAT MISCHARACTERIZES
25 THE TESTIMONY.

26 MR. LEVY: IT IS JUST A QUESTION.

27 THE COURT: OVERRULED.

28 THE WITNESS: STATE THE QUESTION AGAIN.

1 Q BY MR. LEVY: YES. YEAH, WHY DON'T I.
2 IF OUT OF A MONTH THE STUDENTS AT SUMMIT
3 UNIVERSITY WERE GETTING BY ON A LITTLE WATER OR A LITTLE
4 JUICE AND A LITTLE PIECE OF FRUIT NOW AND THEN, ARE YOU
5 TELLING ME IT WOULD BE MORE EXPENSIVE TO TAKE CARE OF THEM
6 IN THAT MANNER THAN TO FEED THEM THREE REGULAR MEALS A DAY?

7 A WHAT I SAID WAS IT WOULD BE A MISLEADING
8 OPINION TO SAY THAT BY INCREASING THE AMOUNT OF FASTING,
9 THAT YOU WOULD MAKE A NOTICEABLE CUT IN THE COST THAT WAS
10 SPENT FOR FOOD. BECAUSE IT WAS NOT STRICTLY WATER FAST, YOU
11 KNOW. IT WAS FRUIT AND FRUIT JUICE FASTING.

12 Q AND AND WATER FAST --

13 A AND FRUIT IS EXPENSIVE.

14 Q AS OPPOSED TO THREE REGULAR MEALS A DAY FOR
15 THOSE SEVEN DAYS OF FASTING, A PIECE OF FRUIT NOW AND THEN
16 AND A LITTLE FRUIT JUICE AND WATER WOULD COST MORE THAN --

17 A I DON'T KNOW THAT A PIECE OF FRUIT NOW AND THEN
18 IS AN ACCURATE DESCRIPTION OF FASTING.

19 Q WELL, DID THEY GO ON A FRUIT DIET OR DID THEY
20 FAST?

21 A WELL, I COULDN'T TELL YOU WHAT EVERY PERSON DID
22 ON EVERY FAST DAY. BUT FRUIT WAS AVAILABLE IN THE CAFETERIA
23 AND PEOPLE WOULD GO GET FRUIT WHEN THEY WERE FASTING.

24 Q NOW, ELIZABETH TOLD US THAT SO FAR AS SHE KNEW,
25 THAT THERE WERE SOMETIMES WHEN THE CAFETERIA WAS CLOSED DOWN
26 DURING THOSE DAYS.

27 A THAT MAY BE. I DON'T KNOW.

28 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. THAT

1 MISCHARACTERIZES THE TESTIMONY.

2 THE COURT: OVERRULED.

3 Q BY MR. LEVY: NOW YOU TOLD US WITH THIS FUND
4 RAISER THAT THE CHURCH HIRED, WHAT HE TOLD YOU.

5 WERE YOU EVER PRESENT WITH HIM WHEN HE
6 DISCUSSED FUND RAISING WITH OTHER CLIENTS?

7 A I WAS NEVER PRESENT WHEN HE DISCUSSED -- WHEN
8 HE WAS TALKING WITH OTHER CLIENTS?

9 Q YES. THAT IS A SIMPLE QUESTION.

10 A NO. HE WOULD GIVE EXAMPLES OF THINGS THAT HE
11 HAD DONE WITH OTHER CLIENTS. NOT BY NAME, BUT BY TYPE.

12 Q DID ANYONE FROM THE CHURCH SEEM TO YOU --
13 EXCUSE ME. I DON'T MEAN TO DISPARAGE BY SAYING C.U.T., BUT
14 THAT IS THE ABBREVIATION FOR CHURCH UNIVERSAL AND TRIUMPHANT
15 THAT SOME PEOPLE USE. SO IF I SAY C.U.T., YOU KNOW I AM
16 REFERRING TO THE CHURCH.

17 DID ANYONE FROM C.U.T. EVER GO TO FUND RAISING
18 SCHOOL?

19 A WELL, FUND RAISING SCHOOL -- HE -- HE CAME TO
20 US. I DON'T KNOW. WE PROBABLY ON OCCASIONS WENT TO HIS
21 OFFICE AND HE GAVE -- I DON'T KNOW THAT YOU COULD CALL IT A
22 SCHOOL, BUT HE WAS TEACHING HOW TO, YOU KNOW, HOW TO USE THE
23 VARIOUS FUND RAISING TECHNIQUES.

24 Q WHEN YOU SAY, "WE WENT TO HIS OFFICE," WHO IS
25 "WE"?

26 A WELL, PRIMARILY IT WOULD HAVE BEEN MONROE
27 SHEARER, BUT OTHER MEMBERS OF THE BOARD ON OCCASION DID MEET
28 WITH HIM.

1 Q NOW, WE WERE TOLD BY ELIZABETH THAT WHEN MONROE
2 SHEARER WENT TO FUND RAISING SCHOOL, YOU AS THE TREASURER,
3 DID YOU SEE THAT THE CHECK WAS MADE OUT TO PAY FOR MONROE
4 SHEARER GOING TO FUND RAISING SCHOOL?

5 A I DON'T KNOW THAT THE TERM "FUND RAISING
6 SCHOOL" IS --

7 Q CALL IT WHAT YOU LIKE.

8 A -- IS A TERM THAT --

9 Q YOU KNOW WHAT I AM TALKING ABOUT, YOU DON'T
10 YOU?

11 MR. KLEIN: I AM GOING TO OBJECT. IT IS VAGUE AND
12 AMBIGUOUS WHAT HE IS TALKING ABOUT, YOUR HONOR.

13 Q BY MR. LEVY: DID YOU EVER --

14 THE COURT: THE OBJECTION IS OVERRULED. I THINK THE
15 QUESTION IS PRETTY CLEAR. FUND RAISING PROGRAM IF THAT IS
16 MORE SATISFACTORY.

17 THE WITNESS: THERE WERE CHECKS WRITTEN TO -- WHAT IS
18 HIS NAME? I DON'T RECALL THE NAME OF HIS FIRM.

19 Q BY MR. LEVY: I AM TALKING ABOUT WRITING. YOU
20 TOLD US THAT YOU WROTE A LOT OF LETTERS TO YOUR FAMILY AND
21 YOU COMMUNICATED QUITE A BIT; IS THAT RIGHT?

22 A I DIDN'T SAY QUITE A BIT. I SAID OCCASIONALLY.

23 Q WAS THERE A TIME AT THE CHURCH WHEN ELIZABETH
24 CLARE PROPHET INSTRUCTED ALL THE MEMBERS THERE TO WRITE HOME
25 AND ASSURE THEIR FAMILIES THAT EVERYTHING WAS JUST COPACETIC
26 AND JUST WONDERFUL?

27 A NOT TO MY KNOWLEDGE.

28 Q YOU REMEMBER JIM JONES, DON'T YOU?

1 A THE NAME DOES RING A BELL. I CAN'T -- IF YOU
2 CAN REFRESH MY MEMORY. I REMEMBER THE NAME, BUT I DON'T --
3 I DON'T KNOW WHO IT IS.

4 Q YOU REMEMBER THE MAN THAT LED A GROUP DOWN TO
5 GUYANA WHERE THE PEOPLE HAD SOME NICE KOOL-AID WITH ARSENIC
6 IN IT?

7 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THIS
8 LINE OF QUESTIONING.

9 THE COURT: SUSTAINED.

10 Q BY MR. LEVY: DID ELIZABETH CLARE PROPHET
11 INSTRUCT THE MEMBERS OF THE CHURCH TO WRITE HOME TO THEIR
12 FAMILIES AFTER THE INCIDENT I JUST REFERRED TO SO AS TO KEEP
13 THE FAMILIES FEELING A LITTLE BIT MORE SAFE AND A LITTLE BIT
14 MORE COMFORTABLE ABOUT THEIR FAMILY MEMBERS WHO WERE WITH
15 THE CHURCH?

16 A I REALLY DON'T RECALL.

17 Q DON'T RECALL THAT.

18 AS A VICE PRESIDENT AND TREASURER, YOU SOMEWHAT
19 FAMILIAR WITH THE CONSTRUCTION THAT WENT ON AT CAMELOT?

20 A CONSTRUCTION?

21 Q YES.

22 A WE DIDN'T DO MUCH CONSTRUCTION THERE. REPAIRS
23 YOU MEAN, REFURBISHING? THAT SORT OF THING, YEAH. WE
24 DIDN'T BUILD ANY -- ANY BUILDINGS THERE.

25 Q WELL, NOW YOU HAVE GOT ME CURIOUS. LET'S SEE.
26 YOU WERE PART OF THE GROUP THAT DISCUSSED HAVING GREGORY
27 COME DOWN TO CAMELOT, WERE YOU NOT?

28 A YES, I WAS PART OF THEM.

1 Q WHAT WAS THE PURPOSE THAT HE WAS SUPPOSED TO
2 COME TO CAMELOT FOR?

3 A HE WAS MAKING DESIGNS, THINKING UP A DESIGN FOR
4 A MONTESSORI SCHOOL.

5 Q YOU HAD HIM COME TO GIVE UP HIS BUSINESS AND
6 MOVE DOWN TO CAMELOT SO HE COULD MAKE A DESIGN FOR A
7 MONTESSORI SCHOOL?

8 A I WOULDN'T SAY THAT WE HAD HIM GIVE UP HIS
9 BUSINESS. HE -- HE OFFERED TO COME AND ASSIST IN THAT WAY.
10 THAT WAS THE TALENT THAT HE HAD TO OFFER.

11 Q WELL NOW, DIDN'T THE CHURCH CONTACT GREGORY
12 MULL AND ASK HIM TO COME TO CAMELOT?

13 A I COULDN'T TELL YOU HOW EXACTLY THE INITIAL
14 CONTACTS WERE MADE WITH HIM. I DON'T KNOW.

15 Q WELL, YOU JUST TOLD US BEFORE YOU REMEMBERED
16 PART OF THE CONVERSATION THAT IF HE WOULD COME DOWN THERE,
17 HE WOULD HAVE TO SELL HIS HOUSE, YOU WOULD ADVANCE HIM
18 MONEY, YOU REMEMBER ALL THAT, BUT YOU DON'T REMEMBER THE
19 REASON THAT HE CAME DOWN THERE --

20 A I ALREADY TOLD YOU THAT. HE CAME TO DESIGN THE
21 MONTESSORI SCHOOL.

22 Q OH. BUT YOU DIDN'T DO ANY BUILDING DOWN THERE,
23 YOU ALSO TOLD ME THAT.

24 A THAT'S RIGHT. WE NEVER BUILT THE SCHOOL THERE.

25 Q SO HE WAS GOING TO DESIGN IT AND YOU WERE NOT
26 GOING TO BUILD IT; IS THAT CORRECT?

27 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT
28 MISSTATES THE TESTIMONY.

1 THE COURT: PLEASE REPHRASE IT.

2 Q BY MR. LEVY: WHAT IS THE NEW JERUSALEM?

3 A I THINK IT IS A TERM THAT IS TAKEN FROM THE
4 BIBLE. I REALLY COULDN'T GIVE YOU A GOOD DEFINITION OF IT.

5 Q DID YOUR CHURCH EMPLOY AN ARCHITECTURAL FIRM TO
6 COME OUT TO THE GROUNDS OF CAMELOT, AND MAKE A TOPOGRAPHICAL
7 SURVEY AND THEN HELP THE CHURCH IN PREPARING A BROCHURE FOR
8 A TEN-YEAR PROGRAM FOR DEVELOPMENT AT CAMELOT?

9 A WELL, THERE WAS A BROCHURE, A BOOKLET THAT WAS
10 PREPARED. I DON'T REALLY RECALL WHETHER THERE WAS A
11 TOPOGRAPHICAL MAP. IT'S BEEN TOO LONG AGO. I DON'T RECALL.

12 Q LET ME HELP YOU. DID IT GIVE A KIND OF LAYOUT
13 ABOUT WHICH BUILDING WOULD BE WHERE, AND WHAT WOULD BE HERE,
14 AND WHICH WALKWAY WOULD BE THERE, THE OVERALL DEVELOPMENT OF
15 ALL 225 ACRES?

16 A AS I RECALL, THE BROCHURE PRESENTED A, YOU
17 KNOW, A THEORETICAL -- A POSSIBLE CAMPUS CONFIGURATIONS,
18 LET'S PUT IT THAT WAY.

19 Q AND HOW MUCH WAS IT GOING TO COST TO DO THAT
20 CAMPUS DEVELOPMENT?

21 A I -- I VAGUELY REMEMBER SOMEWHERE AROUND \$30
22 MILLION DOLLARS AS A TOTAL FIGURE FOR THE COMPLETE
23 CONFIGURATION THAT WAS ENVISIONED IN THAT BROCHURE.

24 Q DID ANYTHING EVER GET DONE WITH THE WORK THAT
25 WAS DONE ON THAT BROCHURE?

26 MR. KLEIN: I AM GOING TO OBJECT. IT IS VAGUE AND
27 AMBIGUOUS, YOUR HONOR.

28 THE COURT: SUSTAINED.

1 Q BY MR. LEVY: DID THE CHURCH EVER GO FORWARD IN
2 THE DEVELOPMENT OF CAMELOT PURSUANT TO PLANS -- OR RATHER
3 PURSUANT TO THE RENDERINGS IN THAT BROCHURE?

4 A NO, NOTHING WAS EVER BUILT. SO I DON'T SEE HOW
5 YOU COULD SAY ANYTHING WAS DONE IN RELATION TO THOSE
6 SPECIFIC RENDERINGS.

7 Q DO YOU REMEMBER HOW MUCH THE CHURCH PAID THAT
8 ARCHITECTURAL FIRM?

9 A NO, NOT OFF THE TOP OF MY HEAD.

10 Q LET'S SEE, YOU REMEMBER THE COST OF FRUITS AND
11 VEGETABLES IN 1975, BUT YOU DON'T REMEMBER THE COST OF THAT
12 ARCHITECTURAL FIRM'S FIGURE?

13 MR. KLEIN: OBJECTION. ARGUMENTATIVE AND MISSTATING
14 THE TESTIMONY.

15 THE COURT: SUSTAINED.

16 Q BY MR. LEVY: THE CHURCH -- DURING THE TIME
17 THAT YOU WERE VICE PRESIDENT AND TREASURER OF THE CHURCH,
18 HAD THE CHURCH EVER OUTLAID A SUBSTANTIAL SUM OF MONEY FOR
19 ARCHITECTURAL WORK PRIOR TO THE TIME THAT GREGORY MULL CAME
20 TO CAMELOT?

21 A I DON'T THINK IT WOULD BE FAIR TO SAY THAT WE
22 HAD EVER LAID OUT A SUBSTANTIAL AMOUNT FOR ARCHITECTURAL
23 WORK BECAUSE WE HAD NEVER -- HADN'T EVER DESIGNED ANY
24 SPECIFIC BUILDING TO BE BUILT. AND I AM SURE THAT WOULD --
25 WOULD START COSTING MORE MONEY TO GET SPECIFIC PLANS.

26 Q LET'S SEE. YOU WERE ON THE EXECUTIVE
27 COMMITTEE?

28 A UH-HUH.

1 Q AND ON THE BOARD OF DIRECTORS, AND YOU WERE THE
2 VICE PRESIDENT AND YOU WERE THE TREASURER.

3 IN ALL THOSE CAPACITIES, DO YOU HAVE ANY
4 RECOLLECTION WHATSOEVER OF THE DOLLAR AMOUNT THAT IT COST
5 THE CHURCH FOR THE ARCHITECTURAL FIRM THAT CONTRIBUTED
6 TOWARD THE MAKING UP OF THAT BROCHURE ABOUT CAMELOT?

7 A IT'S SIMPLY BEEN TOO LONG AGO. I DO NOT RECALL
8 THE COST INVOLVED THERE, NO.

9 Q LET ME SEE IF I CAN HELP YOU. DOES \$50,000
10 RING A BELL?

11 A NO.

12 Q CAN YOU RECALL ANY MAJOR EXPENDITURE IN THE
13 NEIGHBORHOOD OF \$50,000 THAT THE CHURCH EVER EXPENDED FOR
14 ANYTHING IN THE COURSE OF YOUR TIME WHILE YOU WERE THE VICE
15 PRESIDENT AND TREASURER?

16 MR. KLEIN: I AM GOING TO OBJECT AS TO RELEVANCE,
17 YOUR HONOR.

18 THE COURT: WHAT GROUNDS?

19 MR. KLEIN: I AM GOING TO OBJECT AS TO RELEVANCE,
20 YOUR HONOR.

21 THE COURT: OVERRULED.

22 THE WITNESS: WELL, I AM SURE THAT THERE WERE REAL
23 ESTATE PURCHASES WHICH WOULD BE — WOULD EXCEED THE \$50,000.

24 Q BY MR. LEVY: DO YOU REMEMBER WHAT CAMELOT
25 COST?

26 A AS FAR AS THE TOTAL COST, I — I CANNOT RECALL.

27 Q WHAT ABOUT THE RETREAT UP IN MONTANA? DO YOU
28 RECALL THAT?

1 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCE,
2 YOUR HONOR.

3 THE COURT: OVERRULED.

4 THE WITNESS: THE -- I MIGHT NOT BE TOO ACCURATE,
5 BUT -- BECAUSE IT'S BEEN SOMETIME, BUT IT SEEMS TO ME LIKE
6 IT WAS AROUND SEVEN, YOU KNOW, IN THE SEVEN MILLION RANGE.

7 Q BY MR. LEVY: WAS THAT CAMELOT OR --

8 A NO. THAT IS THE MONTANA.

9 Q WHILE YOU WERE ON THE BOARD, DID THERE COME A
10 TIME WHEN THE COASTAL COMMISSION TOLD THE CHURCH THAT IT WAS
11 NOT GOING TO BE ABLE TO DEVELOP THE LAND AT CAMELOT?

12 A I DON'T KNOW THAT IT EVER HAD ANY --

13 Q I CAN HARDLY HEAR YOU.

14 A I DON'T KNOW THAT EVER HAD ANY DIRECT
15 COMMUNICATION. I DON'T THINK THAT THERE WAS EVER ANY
16 COMMUNICATION WITH THE COASTAL COMMISSION.

17 Q DID YOU EVER DISCUSS ANY OF THESE THINGS WITH
18 ELIZABETH?

19 MR. KLEIN: OBJECTION. VAGUE AND AMBIGUOUS AS TO
20 "THESE THINGS."

21 THE COURT: SUSTAINED.

22 Q BY MR. LEVY: DID YOU EVER DISCUSS ANY
23 COMMUNICATION OR ANY CORRESPONDENCE OR ANY INFORMATION THAT
24 ELIZABETH CLARE PROPHET FRANCIS HAD RECEIVED FROM THE
25 COASTAL COMMISSION WITH REGARD TO DEVELOPMENT OF THE
26 PROPERTY KNOWN AS CAMELOT?

27 A I DON'T RECALL EVER RECEIVING ANY COMMUNICATION
28 FROM --

1 Q THAT IS NOT MY QUESTION, SIR.

2 A WELL, I DON'T RECALL ANY DISCUSSION ABOUT
3 ANYTHING THAT WAS EVER RECEIVED EITHER IF THERE WAS EVER
4 ANYTHING RECEIVED FROM --

5 Q NOW YOU LIVE NOW OVER IN CHANDLER, ARIZONA, DO
6 YOU?

7 A YES.

8 Q YOU DON'T ATTEND ANY OF THE TEACHING CENTERS
9 THERE?

10 A NO.

11 Q WOULD IT SURPRISE YOU TO LEARN THAT IN THE
12 TEACHING CENTERS OUT THERE AND IN NEW MEXICO AT THE PRESENT
13 TIME THEY HAVE GOT A SYSTEM WHEREBY THEY FLASH GREGORY'S
14 PICTURE UP ON THE SCREEN, AND THEN KHADAFI, AND THEN RANDALL
15 KING AND THEN ADOLF HITLER?

16 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. I
17 WOULD ASK FOR AN OFFER OF PROOF AT THE BENCH IF COUNSEL
18 WANTS TO ASK THAT QUESTION.

19 THE COURT: ALL RIGHT.

20 (THE FOLLOWING PROCEEDINGS WERE HELD
21 AT THE BENCH:)

22 MR. LEVY: IF YOU RECALL MY QUESTION, IT WAS WAS HE
23 FAMILIAR WITH WHAT THEY DO AT THE TEACHING CENTERS.

24 I RECEIVED A COMMUNICATION LATE LAST EVENING
25 FROM SOMEONE WHO HAS JUST EXITED THE CHURCH WHO VISITED
26 TEACHING CENTERS IN ARIZONA AND IN NEW MEXICO AND WHO GAVE
27 ME THE INFORMATION THAT THAT IS IN FACT WHAT IS HAPPENING
28 THERE.

1 THE COURT: ARE YOU GOING TO BE IN A POSITION TO
2 PRESENT ADMISSIBLE EVIDENCE ON THIS POINT?

3 MR. LEVY: NOT AT THIS POINT, BUT DURING OUR --

4 THE COURT: ON THIS POINT.

5 MR. LEVY: NOT AT THIS TIME, YOUR HONOR. BUT DURING
6 REBUTTAL, I HOPE TO HAVE THE WITNESS HERE. I AM NOT GOING
7 TO GO ANY FURTHER WITH IT.

8 THE COURT: I MEAN AT THE TIME OF REBUTTAL, WHICH
9 WILL BE YOUR TURN.

10 MR. LEVY: AT THE TIME OF REBUTTAL, I HOPE TO, YES,
11 YOUR HONOR.

12 THE COURT: THE OBJECTION IS OVERRULED.

13 MR. LEVY: THANK YOU.

14 (THE PROCEEDINGS WERE RESUMED IN OPEN
15 COURT IN THE PRESENCE OF THE JURY:)

16 Q BY MR. LEVY: DO YOU WANT TO ANSWER MY QUESTION
17 NOW, PLEASE?

18 A OKAY. WOULD YOU RESTATE --

19 Q LET'S SEE IF I CAN DO THAT.

20 ARE YOU AWARE AT THE PRESENT TIME THE TEACHING
21 CENTERS IN ARIZONA AND NEW MEXICO, THEY FLASH A PICTURE OF
22 GREGORY MULL, THEN OF KHADAFI, THEN OF RANDALL KING, THEN OF
23 ADOLF HITLER DURING DECREES AGAINST THOSE PEOPLE? ARE YOU
24 AWARE OF THAT?

25 A I AM NOT AWARE OF THAT. IN FACT I DIDN'T EVEN
26 KNOW THERE WERE ANY TEACHING CENTERS IN NEW MEXICO OR
27 ARIZONA.

28 Q YOU HAVE BEEN AWAY FROM THE CHURCH FOR A LITTLE

1 BIT OVER TWO YEARS NOW?

2 A SOMEWHERE AROUND THREE YEARS, YEAH.

3 Q AND YOU PRETTY MUCH HAVE GOTTEN OUT OF TOUCH
4 WITH THE CHURCH; IS THAT A FAIR STATEMENT?

5 A YEAH. I HAVE NO, YOU KNOW, NO DIRECT PIPE LINE
6 OF INFORMATION.

7 Q MISS FRANCIS TESTIFIED THAT THERE WERE TIMES
8 THAT SHE SHARED INFORMATION WITH THE BOARD ABOUT PROBLEMS
9 THAT MEMBERS OF THE CHURCH HAD. SOME OF THE INFORMATION SHE
10 TOLD US SHE GOT FROM DR. YANEY AND SOME SHE GOT FROM THE
11 CLEARANCE LETTERS. AND WHEN SHE FELT THAT IT WAS OF SUCH A
12 NATURE THAT IT NEEDED TO BE SHARED, SHE TESTIFIED THAT SHE
13 SHARED IT.

14 WERE YOU EVER PRESENT AT ANY BOARD MEETINGS,
15 WHETHER FORMAL OR INFORMAL, WHERE MISS PROPHET SHARED
16 PERSONAL INFORMATION ABOUT CHURCH MEMBERS WITH THE BOARD?

17 A I DON'T RECALL ANY SPECIFICALLY, NO.

18 Q DID YOU EVER DIRECT ANYONE TO CHANGE THE
19 MINUTES OF A BOARD MEETING SO IT WOULD SAVE RANDALL KING ON
20 TAXES?

21 A I AM NOT AWARE OF ANY.

22 Q DIDN'T YOU WRITE A MEMORANDUM, MR. MC CAFFREY,
23 TO THE SECRETARY AT THAT TIME TELLING THE SECRETARY TO
24 CHANGE THE MINUTES OF A BOARD MEETING TO REFLECT RATHER THAN
25 A \$14,000 PAYMENT TO RANDALL KING, TO A \$7,000 PAYMENT AND
26 ADJUST THE FIGURES SO THAT IT WOULD SAVE RANDALL MONEY AND
27 MIGHT IN THE LONG RUN SAVE THE CHURCH MONEY?

28 A I HAVE NO RECOLLECTION.

1 Q IF I SHOWED YOU THE MEMORANDUM, WOULD IT HELP
2 YOU TO REMEMBER?

3 A YEAH. SHOW IT TO ME. I AM SURE I WOULD
4 RECOGNIZE IT IF IT WAS SOMETHING I WROTE.

5 Q DID YOU EVER WRITE MEMORANDUMS TO THE SECRETARY
6 TO CHANGE THE MINUTES OF THE BOARD MEETINGS, MR. MC CAFFREY?

7 A NO, NOT TO MY KNOWLEDGE. I HAVE NO
8 RECOLLECTION OF ANY SUCH MEMORANDUMS.

9 Q DID YOU EVER SEE IN ANY DECREE INFORMATION THAT
10 HAD FILL-IN BLANKS SO THAT THE CHURCH COULD DECREE AGAINST
11 GREGORY MULL WHILE YOU WERE THERE?

12 A THERE ARE SOME DECREES WRITTEN WITH A BLANK IN
13 SO THAT YOU CAN AT THAT POINT INSERT ADDITIONAL INFORMATION
14 OR OTHER INFORMATION WHICH IS NOT INCLUDED IN THE OTHER
15 WORDS THAT ARE ALREADY PRINTED. IS THAT WHAT YOU MEAN?

16 Q YES. LIKE WHEN A DECREE IS SEVEN OR EIGHT OR
17 TEN TYPED WRITTEN PAGES LONG, YOU WILL GO THROUGH THE DECREE
18 AND IT SAYS TO DECREE FOR OR AGAINST JUST ABOUT EVERYTHING
19 IN THE WORLD.

20 LIKE THIS IS A STAFF DECREE AND THIS IS WHAT'S
21 MARKED AS EXHIBIT 107, THE INSERT ON PERSONAL AND IMPERSONAL
22 HATRED, ARE YOU FAMILIAR WITH THAT DECREE?

23 A LET ME SEE IF I REMEMBER SEEING IT.

24 WELL, THE WAY IT IS TYPED OUT WITH THE HEADING,
25 IT WOULD LOOK -- I DON'T RECALL THIS SPECIFIC ONE. BUT THAT
26 IS THE WAY THEY WERE TYPED OUT, YEAH.

27 Q WHY DON'T YOU TAKE A LOOK AT THE LAST PAGE AND
28 YOU WILL SEE THE BLANK I AM TALKING ABOUT.

1 SEE RIGHT THERE WHERE THERE IS JUST A LITTLE
2 BLANK SPACE?

3 A UH-HUH.

4 Q WASN'T IT STANDARD PRACTICE IN THAT CHURCH TO
5 FILL IN THE NAME OF THE PERSON THAT WAS BEING DECREED
6 AGAINST?

7 A I DON'T RECALL OF DECREERING AGAINST A PERSON.

8 Q WHAT ABOUT CASTRO? DID YOU DECREE AGAINST
9 CASTRO?

10 A NOT AGAINST CASTRO, NOT AGAINST A PERSON. WE
11 MIGHT DECREE --

12 Q WHAT ABOUT NIXON OR KISSINGER OR ANYTHING ELSE?

13 A DECREE AGAINST A THING THAT A PERSON DOES
14 WRONG, BUT NOT AGAINST A PERSON.

15 Q WERE YOU PRESENT AT ANY OF THE MEETINGS WHEN
16 GREGORY MULL SIGNED PROMISSORY NOTES?

17 A I RECALL THAT THERE WAS ONE OR TWO PROMISSORY
18 NOTES --

19 Q YOU SEEM TO HAVE A PROBLEM HEARING MY QUESTION.
20 LET ME SAY IT A LITTLE BIT LOUDER FOR YOU.

21 WERE YOU PRESENT AT ANY OF THE -- THOSE
22 MEETINGS WHERE THE PROMISSORY NOTES WERE SIGNED?

23 MR. KLEIN: YOUR HONOR, I WOULD SUGGEST THAT
24 COUNSEL'S REMARK WAS INAPPROPRIATE. THE WITNESS WAS
25 STARTING TO ANSWER THE QUESTION AND COUNSEL --

26 THE COURT: THE WITNESS WAS SPEAKING, BUT HAD NOT
27 STARTED TO ANSWER THAT QUESTION.

28 GO AHEAD.

1 Q BY MR. LEVY: DID YOU UNDERSTAND MY QUESTION,
2 SIR?

3 A WITH THIS MUCH DISRUPTION, I DON'T RECALL YOUR
4 QUESTION.

5 Q LET ME APOLOGIZE.

6 THE COURT: WERE YOU PRESENT WHEN EITHER -- WHEN ANY
7 PROMISSORY NOTE WAS SIGNED BY MR. MULL?

8 THE WITNESS: AS I WAS SAYING, I RECALL THERE BEING A
9 PROMISSORY NOTE OR TWO, BUT I DO NOT RECALL BEING PRESENT
10 WHEN IT WAS ACTUALLY SIGNED. BUT I DO HAVE A MEMORY OF SOME
11 NOTES, YOU KNOW, THAT WERE SIGNED. BUT I DON'T RECALL BEING
12 PRESENT WHEN THEY WERE SIGNED. I MAY HAVE BEEN, BUT I DO
13 NOT RECALL.

14 Q BY MR. LEVY: DO YOU REMEMBER ANYTHING
15 SPECIFICALLY OF YOUR 16 YEARS WITH THE CHURCH?

16 MR. KLEIN: I AM GOING TO OBJECT. THAT IS
17 ARGUMENTATIVE, YOUR HONOR.

18 THE COURT: SUSTAINED.

19 Q BY MR. LEVY: WHAT IS A TELEPHONE TREE?

20 A I HAVE A VAGUE MEMORY OF THAT TERM BEING USED
21 TO -- TO INDICATE WHEN -- WHEN SOMETHING WAS -- A BIT OF
22 INFORMATION WOULD BE CONVEYED TO A NUMBER OF PEOPLE. RATHER
23 THAN ONE PERSON CALLING ALL OF THE PEOPLE, THEY WOULD CALL A
24 FEW AND THE FEW WOULD CALL A FEW MORE. IT IS A WAY OF
25 SPREADING THE TASK OF CALLING A WHOLE BUNCH OF PEOPLE.

26 Q YOU HAVE A VAGUE MEMORY OF THAT?

27 A YES.

28 THE COURT: MAYBE THIS IS A CONVENIENT TIME TO TAKE A

1 TEN-MINUTE RECESS.

2 (RECESS.)

3 THE COURT: PLEASE PROCEED.

4 MR. LEVY: THANK YOU, YOUR HONOR.

5 Q BY MR. LEVY: MR. MC CAFFREY, IN YOUR POSITION
6 AS VICE PRESIDENT AND TREASURER OF CHURCH UNIVERSAL AND
7 TRIUMPHANT, DID YOU EVER HAVE ANY OCCASION TO FALSIFY
8 DOCUMENTS?

9 A NO, NONE WHATSOEVER.

10 Q DO YOU RECALL THE HOME THAT WAS LEASED ON THE
11 BEACH FOR ELIZABETH CLARE PROPHET AND RANDALL KING?

12 A YEAH. THERE WAS -- THERE WAS A HOME LEASED
13 THERE.

14 Q WEREN'T YOU THE ONE THAT FALSIFIED THE
15 FINANCIAL STATEMENTS FOR RANDALL AND ELIZABETH TO SHOW A
16 GREATER INCOME THAN THEY WERE ACTUALLY GETTING SO THEY COULD
17 QUALIFY TO LEASE THE PROPERTY?

18 A NO, I HAVE NO RECOLLECTION OF ANYTHING LIKE
19 THAT.

20 Q YOU DON'T HAVE A RECOLLECTION.
21 EVER HEARD OF A PLACE CALLED CLAYTON BROKERAGE?

22 A YEAH, I'VE HEARD THE TERM.

23 Q LITIGATION INVOLVED WITH CLAYTON BROKERAGE, WAS
24 THERE?

25 A I GUESS THERE WAS LITIGATION. THERE WAS NEVER
26 ANY TRIAL THAT I RECALL.

27 Q GOT RESOLVED ONE WAY OR ANOTHER, RIGHT?

28 A I -- YES.

1 THE COURT: WHY DON'T YOU MOVE UP A LITTLE BIT CLOSER
2 TO THE SPEAKER SO WE CAN HEAR YOU BETTER.

3 THE WITNESS: YES.

4 Q BY MR. LEVY: WEREN'T YOU THE ONE THAT ORDERED
5 LOAN DOCUMENTS TO BE BACK-DATED?

6 A NO.

7 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THE
8 RELEVANCY OF THIS LINE OF QUESTIONING AND ALSO OBJECT
9 PURSUANT TO 787 OF THE EVIDENCE CODE.

10 THE COURT: OVERRULED.

11 Q BY MR. LEVY: IN PURSUIT OF ELIZABETH'S AND THE
12 CHURCH'S PURPOSES, DIDN'T YOU AT ONE TIME DEPOSIT MONEY INTO
13 YOUR MOTHER'S ACCOUNT FOR THE BENEFIT OF ELIZABETH CLARE
14 PROPHET IN ORDER TO HIDE THE FACT THAT EXCESS MONEY WAS
15 GOING TO ELIZABETH CLARE PROPHET?

16 MR. KLEIN: YOUR HONOR, I WILL OBJECT TO THE
17 RELEVANCY AND ALSO OBJECT PURSUANT TO 787 OF THE EVIDENCE
18 CODE.

19 THE COURT: OVERRULED.

20 THE WITNESS: INTO MY MOTHER'S ACCOUNT? NO.

21 Q BY MR. LEVY: EITHER YOUR MOTHER'S ACCOUNT OR
22 ELIZABETH'S MOTHER'S ACCOUNT?

23 A NO.

24 Q NO ACCOUNTS IN PASADENA IN SOMEONE ELSE'S NAME
25 FOR THE BENEFIT OF ELIZABETH CLARE PROPHET?

26 A NOT THAT I KNOW OF.

27 Q YOU REMEMBER SOMEBODY BY THE NAME OF HARPER?

28 A WELL, IT IS A -- I KNOW PEOPLE BY THAT NAME,

1 YES.

2 Q WHAT ABOUT SOMEBODY THAT WAS ON THE BOARD OR
3 TREASURER OR SOMEBODY WHO HAD TO DO WITH THE CHURCH BY THE
4 NAME OF HARPER?

5 A THERE WAS A STAFF MEMBER AT ONE TIME BY THE
6 NAME OF HARPER, YES.

7 Q DID YOU DIRECT HARPER TO CHANGE BOARD MINUTES
8 TO BENEFIT RANDALL AND ELIZABETH?

9 A NO. HARPER WAS, YOU KNOW, WAS -- PRECEDED ME
10 AS THE TREASURER. AND I WAS NEVER IN A POSITION TO DIRECT
11 HIM TO DO ANYTHING.

12 Q DID THE CHURCH AND RANDALL AND ELIZABETH HAVE
13 SOME KIND OF DIFFICULTY WITH THE COMMODITY MARKET AND WITH
14 THE I.R.S.?

15 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THIS
16 LINE OF QUESTIONING AS IRRELEVANT AND AS TO 787 OF THE
17 EVIDENCE CODE.

18 THE COURT: SUSTAINED.

19 Q BY MR. LEVY: YOU TESTIFIED EARLIER THAT AT
20 BEST, RANDALL AND ELIZABETH MIGHT HAVE -- DURING THE YEARS
21 '75 TO '78, THEY MIGHT HAVE MADE AS MUCH AS 30- TO \$50,000 A
22 YEAR, INCLUDING SALARY AND EXPENSES; IS THAT CORRECT?

23 A AND ALL OF THE BENEFITS.

24 Q AND ALL OF THE BENEFITS. DO YOU RECALL WHAT
25 YEARS IT WAS THAT ELIZABETH AND A NUMBER OF OTHER CHURCH
26 MEMBERS WENT ALL THE WAY TO GUINEA IN AFRICA?

27 A IT WAS I BELIEVE DURING THE TIME THAT WE WERE
28 AT PASADENA, IF I RECALL, AND THAT WAS THE TWO YEARS

1 PRECEDING CAMELOT.

2 Q SO WHAT YOU ARE ACTUALLY SAYING, IT WAS '76 OR
3 '77 AND '78?

4 A WELL, I AM SURE IT IS A -- IT IS A DEMONSTRABLE
5 FACT AS TO THE EXACT DAY WE MOVED TO CAMELOT. AND MY MEMORY
6 IS ONLY THAT IT WAS AT PASADENA. SO TO BE ACCURATE, THAT IS
7 AS FAR AS I THINK I SHOULD STATE AS FAR AS A DATE. IT WAS
8 DURING THE TWO YEARS PRIOR TO GOING TO CAMELOT.

9 Q DO YOU HAVE A BAD MEMORY?

10 A THAT IS PROBABLY A REASONABLE DESCRIPTION, YES.

11 Q WAS THERE ANYTHING THAT HAPPENED IN THE ENTIRE
12 TIME YOU WERE WITH CHURCH UNIVERSAL AND TRIUMPHANT THAT IS
13 REALLY NOTABLE THAT YOU DO REMEMBER?

14 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT
15 IS VAGUE AND AMBIGUOUS.

16 THE COURT: PLEASE REPHRASE IT.

17 Q BY MR. LEVY: SO SOMETIME DURING 1977 OR '78,
18 ELIZABETH TRAVELED TO AFRICA.

19 DO YOU REMEMBER WHETHER SHE TRAVELED BY HERSELF
20 OR IF SHE TOOK AN ENTOURAGE WITH HER?

21 A WELL, SHE DIDN'T TRAVEL ALONE. I DON'T RECALL
22 HOW MANY PEOPLE WENT.

23 Q DID THE CHURCH PAY HER WAY?

24 A I AM SURE THAT IT WAS A CHURCH -- A TOUR FOR
25 THE CHURCH. SO IT WOULD HAVE BEEN PAID BY THE CHURCH.

26 Q WHAT ABOUT EUROPE? DID SHE ALSO TRAVEL TO
27 EUROPE DURING THOSE YEARS?

28 A I DON'T RECALL ANY SPECIFIC TOUR TO EUROPE

1 WHILE WE WERE IN PASADENA.

2 Q DIDN'T ELIZABETH GO TO ITALY TO EXAMINE THE
3 COMMUNIST SITUATION IN ITALY DURING 1977 OR '78?

4 A I -- I COULDN'T SAY. I DON'T RECALL.

5 Q WELL, WEREN'T YOU TREASURER OF THE ORGANIZATION
6 AND VICE PRESIDENT DURING THOSE YEARS?

7 A THAT'S -- OF COURSE. I HAVE ALREADY STATED
8 WHEN I WAS TREASURER. BUT AS TO WHETHER SOMEONE WENT TO
9 ITALY AT A CERTAIN TIME, I DON'T RECALL THINGS LIKE THAT.

10 Q LET'S SEE. WERE YOU THE TREASURER WHEN MISS
11 PROPHET WENT TO HAWAII WITH HER FAMILY?

12 A WELL, WHICH TIME? THEY HAVE BEEN TO HAWAII A
13 NUMBER OF TIMES.

14 THE COURT: MAYBE I CAN HELP, MR. MC CAFFREY. LET'S
15 FORGET ITALY FOR A MINUTE.

16 DURING THE TIME THAT YOU WERE AT CAMELOT, DO
17 YOU HAVE ANY RECOLLECTION OF MRS. FRANCIS HAVING TRAVELED TO
18 EUROPE? FORGET THE ITINERARY, FORGET THE SPECIFICS, BUT DO
19 YOU HAVE A RECOLLECTION OF HER HAVING TRAVELED TO EUROPE?

20 THE WITNESS: NO, I CAN'T SAY THAT I RECALL A TRIP.

21 THE COURT: I WILL ASK YOU ONE MORE QUESTION AND I
22 WILL STOP.

23 DURING THE YEARS THAT YOU WERE AT CAMELOT,
24 FORGET THE DATE, FORGET WHAT ISLANDS SHE MAY HAVE VISITED,
25 DO YOU HAVE A RECOLLECTION OF MRS. FRANCIS HAVING VISITED
26 THE HAWAIIAN ISLANDS?

27 THE WITNESS: WELL, I DO RECALL THAT SHE HAS BEEN
28 THERE ON MORE THAN ONE OCCASION. I COULDN'T SAY HOW MANY

1 AND I WOULD SAY THAT THE LIKELIHOOD IS GREAT THAT DURING THE
2 TIME THAT I WAS AT CAMELOT, THAT SHE PROBABLY WAS IN HAWAII.
3 I DON'T RECALL ANY OF HER SPECIFIC TRIPS TO HAWAII, BUT I
4 KNOW SHE HAS GONE.

5 THE COURT: I AM TRYING TO GET AWAY FROM SPECIFICS
6 BECAUSE SOMETIMES WE REMEMBER THAT GENERALLY SOMETHING
7 OCCURRED, BUT WE MIGHT NOT RECALL THE DATES OR THE
8 SPECIFICS.

9 BUT YOU DO HAVE A RECOLLECTION OF HER BEING IN
10 THE HAWAIIAN ISLANDS?

11 THE WITNESS: YES.

12 THE COURT: AND IS IT CORRECT, SIR, THAT YOU DO NOT
13 HAVE A RECOLLECTION OF HER BEING ON THE EUROPEAN CONTINENT?

14 THE WITNESS: THAT IS TRUE.

15 THE COURT: IS THAT TRUE?

16 THE WITNESS: (NODS HEAD UP AND DOWN.)

17 THE COURT: FAIR ENOUGH. AND I AM SORRY, I ASKED YOU
18 MORE THAN ONE MORE QUESTION.

19 MR. LEVY: THANK YOU.

20 Q LET ME TEST YOUR MEMORY ONE MORE TIME. DO YOU
21 REMEMBER ANYTHING CALLED A CLOCK OF BETRAYAL?

22 A NO, I DON'T RECALL THAT TERMINOLOGY.

23 Q DID YOU EVER SPEND ANY TIME --

24 A THE CLOCK, YOU KNOW, WAS A TERM THAT WAS USED,
25 BUT I DON'T REMEMBER IT BEING CLOCK OF BETRAYAL.

26 Q AND HOW WAS THE CLOCK USED? JUST TO TELL TIME?

27 A I WOULDN'T CONSIDER MYSELF COMPETENT TO EXPLAIN
28 THE DETAILS OF WHAT I RECALL AS BEING REFERRED TO AS THE

1 COSMIC CLOCK.

2 Q NO, NO, NO, I WASN'T TALKING ABOUT THE COSMIC
3 CLOCK. I WAS TALKING ABOUT THE CLOCK OF BETRAYAL.

4 A THAT IS THE ONLY WAY THAT I RECALL THE WORD
5 "CLOCK" BEING USED.

6 Q LET'S SEE. NOW, YOU TOLD US YOU WERE ON THE
7 EXECUTIVE COMMITTEE WHEN MR. MULL WAS ASKED TO COME TO
8 CAMELOT.

9 DID YOU CALL MR. MULL AND ASK HIM TO COME TO
10 CAMELOT?

11 A NO.

12 Q DO YOU KNOW WHO DID?

13 A MY RECOLLECTION IS MOST OF THE PERSONAL
14 DEALINGS WITH GREGORY WAS HANDLED BY MONROE SHEARER.

15 Q WHEN -- NOW, BACK TO MY QUESTION AGAIN.

16 DO YOU KNOW FOR A FACT WHO DID CALL MR. MULL?

17 A I WAS NEVER PRESENT IN A ROOM WHEN ANYONE EVER
18 CALLED HIM.

19 Q SO YOU HAVE NO --

20 A SO I COULDN'T STATE AS AN ABSOLUTE FACT THAT
21 ANYONE EVER CALLED HIM.

22 Q OR --

23 THE COURT: ONCE AGAIN, EVEN THOUGH YOU MIGHT NOT
24 HAVE BEEN PRESENT WHEN THE CALL WAS MADE, DO YOU HAVE OTHER
25 KNOWLEDGE?

26 THE WITNESS: FROM DISCUSSIONS WITH MONROE, HE
27 COMMUNICATED WITH GREGORY. WHETHER IT WAS ALL BY TELEPHONE
28 OR MAYBE SOME BY LETTER OR IN PERSON, I COULDN'T GIVE YOU

1 THE DETAILS. BUT HE DID COMMUNICATE WITH GREGORY.

2 Q BY MR. LEVY: DID YOU EVER COMMUNICATE WITH
3 GREGORY?

4 A IN CONVERSATIONS ONLY.

5 MR. KLEIN: I AM GOING TO OBJECT AS TO TIME FRAME,
6 YOUR HONOR. IT IS VAGUE AND AMBIGUOUS AS TO TIME.

7 THE COURT: JUST STATE THE GROUNDS.

8 MR. KLEIN: VAGUE AND AMBIGUOUS, YOUR HONOR.

9 THE COURT: SUSTAINED.

10 Q BY MR. LEVY: LET'S GO TO THE PARTICULAR PERIOD
11 OF TIME IMMEDIATELY BEFORE MR. MULL CAME TO CAMELOT.

12 DID YOU YOURSELF IN THE YEAR 1978 COMMUNICATE
13 DIRECTLY WITH GREGORY MULL ABOUT THE TERMS AND CONDITIONS
14 UNDER WHICH HE WOULD COME TO CAMELOT?

15 A NO.

16 Q AND THE ONLY WAY THAT YOU WOULD HAVE OF KNOWING
17 ABOUT THEM, WHAT THOSE TERMS AND CONDITIONS MAY HAVE BEEN,
18 WOULD HAVE BEEN EITHER FROM MONROE OR FROM DISCUSSIONS WITH
19 THE REST OF THE BOARD; IS THAT CORRECT?

20 A YES.

21 Q DID YOU EVER DISCUSS ANYTHING WITH REGARD TO
22 THE TERMS AND CONDITIONS WITH MR. GREGORY MULL?

23 A NO.

24 Q KNOW SOMEBODY NAMED DONALD TROWBRIDGE?

25 A YEAH, I KNOW THE NAME.

26 Q DO YOU KNOW THE PERSON?

27 A YEAH. I HAVEN'T SEEN HIM FOR A NUMBER OF
28 YEARS. I DON'T REALLY KNOW -- HAVE ANY IDEA WHERE HE IS.

1 Q OH, HE WAS HERE LAST WEEK. DID YOU HAVE ANY
2 DEALINGS WITH HIM WITH REGARD TO MR. MULL?

3 A NO.

4 Q AS PART OF THE TEACHINGS OF THE CHURCH, ARE YOU
5 TAUGHT TO TELL THE TRUTH?

6 A YES.

7 Q WERE YOU A KEEPER OF THE FLAME?

8 A YES.

9 Q HAVE A CODE AS A KEEPER OF THE FLAME, FOUR
10 LITTLE THINGS TO DO?

11 A FOUR LITTLE THINGS TO DO? I DON'T --

12 Q YOU KNOW. TO KNOW, TO DARE, TO DO AND TO BE
13 SILENT. HAVE YOU EVER HEARD THAT?

14 A I -- I'VE HEARD THAT PHRASE. I WOULDN'T SAY
15 THAT IT IS -- WHAT DID YOU SAY, A CODE?

16 Q WELL, CALL IT WHAT YOU LIKE. ISN'T THAT THOSE
17 FOUR LITTLE THINGS THINGS THAT MEMBERS OF THE FLAME ARE
18 SUPPOSED TO DO?

19 A I DON'T RECALL IT BEING THINGS THAT YOU ARE
20 SUPPOSED TO DO. IT IS A STATEMENT. I COULDN'T TELL YOU
21 WHERE, YOU KNOW, WHAT IT IS REFERRING TO.

22 Q HOW LONG WERE YOU A MEMBER OF THE KEEPERS OF
23 THE FLAME?

24 A IT WAS PROBABLY IN '67, SOMETIME BETWEEN MAY
25 AND THE END OF THE YEAR WHEN I PROBABLY JOINED. I DON'T
26 RECALL THE SPECIFIC DATE, BUT IT WAS PROBABLY WITHIN THE
27 YEAR '67 WHEN I FIRST BECAME A KEEPER OF THE FLAME.

28 Q AND YOU WERE A KEEPER OF THE FLAME THROUGHOUT

1 YOUR STAY WITH THE CHURCH?

2 A YES.

3 Q DID YOU EVER HEAR ELIZABETH SAY AT ANY OF THE
4 MEETINGS THAT THE ENDS JUSTIFY THE MEANS?

5 A NO.

6 Q YOU NEVER HEARD HER SAY THAT?

7 A NO. IN FACT THAT IS CONTRARY TO THE TEACHINGS
8 THAT SHE HAS TAUGHT.

9 Q AS PART OF THE TEACHINGS, ARE YOU INSTRUCTED TO
10 TELL THE TRUTH?

11 A ALWAYS.

12 Q YOU WOULDN'T LIE, WOULD YOU?

13 A NO.

14 MR. LEVY: YOUR HONOR, I'D ASK THIS WITNESS TO BE
15 RETAINED BY JURISDICTION OF THE COURT UNTIL TOMORROW. I
16 NEGLECTED TO BRING THAT DOCUMENT THAT HE ASKED TO TAKE A
17 LOOK AT AND I WOULD LIKE TO BRING IT TOMORROW SO THAT WE CAN
18 TAKE A LOOK AT YOUR MEMO TO --

19 THE COURT: JUST A SECOND. CAN YOU HAVE IT HERE THIS
20 AFTERNOON?

21 MR. LEVY: I CAN SURE AS THE DEVIL TRY.

22 THE COURT: WHY DON'T YOU MAKE A PHONE CALL OR DO
23 WHATEVER YOU HAVE TO DO AND HAVE IT HERE THIS AFTERNOON.

24 MR. LEVY: THE UNFORTUNATE PART IS I AM A SOLE
25 PRACTITIONER. WHEN I PICK UP THE PHONE, THERE IS NOBODY ON
26 THE OTHER END WHEN I AM HERE IN COURT. I WILL ATTEMPT TO
27 HAVE SOMEBODY GET IT. I DON'T KNOW EXACTLY WHERE IT IS IN
28 THE OFFICE.

1 IN THE EVENT I CAN'T GET IT HERE, CAN WE HAVE
2 THE WITNESS RETAINED UNTIL JUST THE BEGINNING TOMORROW
3 MORNING?

4 THE COURT: IF YOU NEED A FEW EXTRA MINUTES AT
5 LUNCHTIME, WE WILL DO IT THAT WAY. MAYBE YOU CAN HAVE
6 SOMEBODY OBTAIN IT FOR YOU.

7 MR. LEVY: THANK YOU, YOUR HONOR.

8 AT THIS TIME I HAVE NOTHING FURTHER FOR THIS
9 WITNESS.

10 THE COURT: ANY QUESTIONS?

11 MR. KLEIN: YES, YOUR HONOR.

12

13 REDIRECT EXAMINATION +

14 BY MR. KLEIN:

15 Q MR. MC CAFFREY, FROM THE TIME YOU FIRST BECAME
16 A STAFF MEMBER IN THIS CHURCH, WHICH WOULD BE 1972 --

17 A '71.

18 Q '71, FROM THAT TIME UNTIL '83, WHEN YOU LEFT
19 THE CHURCH, WERE THERE EVER ANY RESTRICTIONS ON CONTACT
20 BETWEEN CHURCH MEMBERS AND THEIR FAMILY AND FRIENDS WHO WERE
21 NOT CHURCH MEMBERS?

22 A NO.

23 Q WITH RESPECT TO THE FRUIT JUICE THAT WAS HAD ON
24 FAST DAYS, WAS THAT TYPICALLY FRESH-SQUEEZED JUICE, FRUIT
25 JUICE?

26 A I THINK THERE WERE SOME THAT WERE
27 FRESH-SQUEEZED. THERE MAY HAVE BEEN OCCASIONS WHEN IT WAS
28 IN A BOTTLE.

1 Q DID THEY EVER USE CANNED FRUIT JUICES FOR
2 THOSE?

3 A NO, I DON'T RECALL EVER SEEING THE CAN TYPE.

4 Q YOU WERE ASKED BY MR. LEVY ABOUT THIS -- IF YOU
5 WERE AWARE THAT A TEACHING CENTER FLASHED PICTURES OF MR.
6 MULL AND OTHER INFAMOUS CHARACTERS --

7 MR. LEVY: I AM GOING TO OBJECT TO THAT, YOUR HONOR.
8 MR. MULL HAS NOT BEEN CHARACTERIZED HERE AS ANYBODY
9 INFAMOUS. WHEN YOU PUT THE TWO OF THEM --

10 THE COURT: JUST A SECOND. THAT ISN'T WHAT COUNSEL
11 SAID.

12 MR. LEVY: HE SAID MR. MULL AND OTHER INFAMOUS
13 CHARACTERS AND I OBJECT TO THAT KIND OF CHARACTERIZATION.

14 MR. KLEIN: YOUR HONOR, I --

15 THE COURT: WHY DON'T YOU START OVER.

16 MR. KLEIN: IT WAS CERTAINLY NOT MY INTENTION TO DO
17 OR SAY ANYTHING LIKE THAT.

18 THE COURT: START OVER.

19 Q BY MR. KLEIN: MR. LEVY ASKED YOU IF YOU HAD
20 EVER HEARD OF TEACHING CENTERS FLASHING PICTURES OF MR. MULL
21 AS WELL AS INFAMOUS CHARACTERS, WORLD LEADERS, HE MENTIONED
22 A NUMBER OF THEM.

23 IN YOUR YEARS WITH THE CHURCH, ALL OF YOUR
24 YEARS WITH THE CHURCH, HAVE YOU EVER HEARD OF THAT BEING
25 DONE EITHER AT A TEACHING CENTER OR ANY OTHER FACILITY OWNED
26 BY THE CHURCH?

27 A NO.

28 Q EVER HEARD OF ANYTHING SIMILAR TO THAT,

1 FLASHING PICTURES OF A PERSON WHO HAD BEEN A MEMBER AND AT
2 THE SAME TIME FLASHING PICTURES OF INFAMOUS PEOPLE?

3 A NOT BY, YOU KNOW, ASSOCIATING ONE PICTURE OF
4 ONE PERSON WITH ANOTHER PICTURE OF ANOTHER PERSON, NO. I
5 DON'T KNOW THAT THAT WAS EVER --

6 Q WITH RESPECT TO TRAVEL BY ELIZABETH CLARE
7 PROPHET, DOES THE CHURCH EVER HAVE SEMINARS IN OTHER PARTS
8 OF THE WORLD?

9 A YES.

10 Q DOES THE CHURCH HAVE MEMBERS IN OTHER PARTS OF
11 THE WORLD?

12 A YES.

13 Q DOES THE CHURCH EVER HAVE CONFERENCES IN OTHER
14 PARTS OF THE WORLD?

15 A YES.

16 Q TO YOUR KNOWLEDGE, DOES ELIZABETH CLARE PROPHET
17 GO TO CONFERENCES AND SEMINARS AND TEACHING CENTERS IN OTHER
18 PARTS OF THE WORLD ON CHURCH-RELATED MATTERS?

19 A YES.

20 Q YOU SAID THAT YOU HAD A BAD MEMORY. IS THERE
21 ANYTHING WHERE YOU HAVE TESTIFIED TO TODAY, ANYTHING WHERE
22 YOU DID HAVE A MEMORY, WHERE THERE IS ANY QUESTION IN YOUR
23 MIND AS TO WHETHER YOUR TESTIMONY WAS ACCURATE OR NOT?

24 A NO. NOT AT ALL. IF I DON'T -- IF I AM NOT
25 CERTAIN OF IT, I WILL, YOU KNOW, NOT TRY TO PRETEND THAT I
26 DO REMEMBER SOMETHING WHEN I DO NOT.

27 Q BY THE WAY, ARE YOU A KEEPER OF THE FLAME NOW?

28 A NO.

1 Q YOU MENTIONED AN ESTIMATE FOR A PURCHASE PRICE
2 ON THE MONTANA PROPERTY. I THINK THE NUMBER YOU SAID WAS IN
3 THE NEIGHBORHOOD OF SEVEN MILLION DOLLARS.

4 WAS THE SEVEN MILLION DOLLARS PUT DOWN IN CASH,
5 OR WAS THERE A DOWN PAYMENT MADE ON THE TOTAL PRICE OF SEVEN
6 MILLION DOLLARS AND THE MORTGAGE?

7 A I THINK THAT WAS THE TOTAL PRICE. IT IS, YOU
8 KNOW, IT'S BEEN YEARS SINCE I WAS INVOLVED WITH THOSE
9 DETAILS AT ALL, AND I -- I KNOW THAT IT WASN'T ALL PAID AT
10 ONCE. IT WAS OVER, YOU KNOW, A PERIOD OF YEARS. I COULDN'T
11 EVEN TELL YOU NOW HOW MUCH IS STILL OWED ON IT. I HAVE NO
12 IDEA.

13 Q WHAT YOU ARE SAYING IF THE PRICE WAS SEVEN
14 MILLION OR WHATEVER IT WAS, THEY DIDN'T JUST PUT DOWN SEVEN
15 MILLION DOLLARS AND SAY, "NOW THE PROPERTY IS OURS"?

16 A NO. IT WAS A TIME PAYMENT.

17 MR. KLEIN: THANK YOU.

18 NO FURTHER QUESTIONS, YOUR HONOR.

19 MR. LEVY: LYNN, WHAT IS NEXT IN NUMBER?

20 THE CLERK: 110.

21 MR. LEVY: 110. I AM GOING TO MARK THIS 110 AND ASK
22 THAT IT BE MARKED FOR IDENTIFICATION AS EXHIBIT 110.

23 (MARKED FOR ID: ^ EXHIBIT 110, BROCHURE)

24

25 RE-CROSS-EXAMINATION +

26 BY MR. LEVY:

27 Q ARE YOU FAMILIAR WITH THIS BROCHURE?

28 A YEAH. I HAVE SEEN THAT. NOT FOR YEARS, BUT --

1 Q I AM OPENING IT TO ABOUT THE THIRD OR FOURTH
2 PAGE. WOULD YOU READ THAT SECTION TO THE COURTROOM?

3 A YES. "TO KNOW, TO DO, TO DARE AND TO BE
4 SILENT."

5 THE COURT: I AM SORRY, WE CAN'T HEAR YOU. WILL YOU
6 PLEASE KEEP YOUR VOICE UP SO WE CAN HEAR YOU.

7 THE WITNESS: YES. "TO KNOW, TO DO" -- EXCUSE ME.
8 "TO KNOW, TO DARE, TO DO AND TO BE SILENT."

9 Q BY MR. LEVY: WHAT WERE YOU TAUGHT THAT THAT
10 MEANT?

11 A WELL, MY UNDERSTANDING --

12 Q I DIDN'T ASK YOU FOR YOUR UNDERSTANDING, SIR.
13 I ASKED YOU WHAT WERE YOU TAUGHT THAT THAT MEANT?

14 A ALL I CAN TELL YOU IS MY UNDERSTANDING.

15 MR. KLEIN: I AM GOING TO OBJECT. THERE IS NO
16 FOUNDATION THAT HE WAS TAUGHT ANYTHING ON IT. I WOULD
17 OBJECT FOR LACK OF FOUNDATION.

18 THE COURT: WHAT WERE YOU INSTRUCTED, IF ANYTHING,
19 ABOUT THE MEANING OF THE PORTION YOU JUST READ?

20 THE WITNESS: I --

21 THE COURT: OR IF "INSTRUCTED" IS A PROBLEM WORD FOR
22 YOU, WHAT WERE YOU TOLD, IF ANYTHING, BY ANYBODY THAT THAT
23 MEANT?

24 THE WITNESS: I CAN ONLY RECALL, YOU KNOW, MY GENERAL
25 CONCEPT OF WHAT I THINK IT MEANS. I DON'T RECALL ANY
26 SPECIFIC INSTRUCTION OR WORDS EXPLAINING WHAT -- WHAT THIS
27 MEANT.

28 THE COURT: DO YOU HAVE ANY RECOLLECTION OF ANYBODY

1 EVER TELLING YOU WHAT IT MEANT?

2 THE WITNESS: NO.

3 THE COURT: GO AHEAD.

4 Q BY MR. LEVY: ISN'T IT A FACT THAT ELIZABETH
5 TELLS ALL OF THE FOLLOWERS IF IT IS TO PROTECT THE CHURCH
6 ABOUT SOMETHING YOU KNOW AND SOMETHING YOU WOULD DARE TO DO,
7 TO BE SILENT, TO PROTECT HER AND THE CHURCH? ISN'T THAT
8 EXACTLY WHAT IT MEANS?

9 A NO, I DON'T THINK SO AT ALL.

10 MR. LEVY: I HAVE NOTHING FURTHER FOR THIS WITNESS,
11 YOUR HONOR. I AM NOT EVEN GOING TO BOTHER BRINGING BACK
12 THAT SLIP. I DON'T THINK THAT WOULD REFRESH HIS
13 RECOLLECTION EITHER.

14 I'D ASK THAT THIS NUMBER 110 BE ENTERED INTO
15 EVIDENCE.

16 THE COURT: IT'S RECEIVED.

17 (RECEIVED EVID: ^ EXHIBIT 110)

18

19 FURTHER REDIRECT EXAMINATION +

20 BY MR. KLEIN:

21 Q MR. MC CAFFREY, WHAT WAS YOUR UNDERSTANDING AS
22 TO WHAT THOSE WORDS MEAN?

23 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THIS
24 WITNESS HAS ALREADY TOLD US HE DOESN'T KNOW WHAT THEY MEAN.

25 MR. KLEIN: THAT IS NOT WHAT HE SAID, YOUR HONOR.

26 THE COURT: WHAT IS THE RELEVANCE OF HIS
27 UNDERSTANDING IF IT IS JUST HIS UNDERSTANDING?

28 THE OBJECTION IS SUSTAINED.

1 MR. KLEIN: YOUR HONOR, I WOULD SUGGEST --

2 THE COURT: THE OBJECTION IS SUSTAINED. PLEASE
3 PROCEED.

4 Q BY MR. KLEIN: MR. MC CAFFREY, HAVE YOU
5 TESTIFIED TRUTHFULLY TO THIS JURY?

6 A YES.

7 Q HAVE THERE BEEN ANY FACTS ABOUT WHICH YOU'VE
8 BEEN ASKED TODAY IN YOUR TESTIMONY, EITHER BY MYSELF OR BY
9 MR. LEVY, WHERE YOU HAVE REMAINED SILENT RATHER THAN GIVE AN
10 ANSWER THAT YOU PERCEIVED TO BE BAD FOR THE CHURCH OR BAD
11 FOR ELIZABETH CLARE PROPHET?

12 A NO. I HAVE SIMPLY ANSWERED EVERYTHING TO THE
13 BEST OF MY ABILITY TO RECALL THE SPECIFICS OF EACH QUESTION.

14 Q AS YOU SIT HERE RIGHT NOW, DO YOU FEEL ANY
15 OBLIGATION TO IN ANY WAY MISLEAD OR BE SILENT IN ORDER TO
16 HELP THIS CHURCH?

17 A NO.

18 MR. KLEIN: THANK YOU.

19 NO FURTHER QUESTIONS.

20 MR. LEVY: NOTHING FURTHER FOR THIS WITNESS, YOUR
21 HONOR.

22 THE COURT: MAY THIS WITNESS BE EXCUSED?

23 MR. LEVY: FINE BY ME.

24 MR. KLEIN: I HAVE NO FURTHER QUESTIONS.

25 THE COURT: YOU ARE EXCUSED.

26 MR. KLEIN: I WOULD CALL ELISSA THEODORE, YOUR HONOR.

27 ///

28 ///

1 ELISSA PATRICIA THEODORE, +
2 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
3 TESTIFIES AS FOLLOWS:

4 THE CLERK: PLEASE BE SEATED. PLEASE STATE YOUR NAME
5 FOR THE RECORD AND PLEASE SPELL YOUR FIRST AND LAST NAME.

6 THE WITNESS: MY NAME IS ELISSA PATRICIA THEODORE.
7 THE FIRST NAME IS SPELLED E-L-I-S-S-A, THE LAST NAME IS
8 SPELLED T-H-E-O-D-O-R-E.

9 THE CLERK: YOUR MIDDLE NAME, TOO.

10 THE WITNESS: PATRICIA, P-A-T-R-I-C-I-A.

11 THE CLERK: THANK YOU.

12 THE COURT: ALL RIGHT.

13

14 DIRECT EXAMINATION +

15 BY MR. KLEIN:

16 Q FIRST I WILL TELL YOU TO TRY TO SPEAK LOUD AND
17 SPEAK INTO THAT MICROPHONE SO THAT EVERYBODY WILL BE ABLE TO
18 HEAR YOU.

19 A OKAY.

20 Q WOULD YOU GIVE US YOUR EDUCATIONAL BACKGROUND,
21 PLEASE?

22 A YES. I HAVE A FOUR YEAR BACHELOR'S DEGREE FROM
23 SYRACUSE UNIVERSITY. I AM A HIGH SCHOOL ENGLISH AND SPEECH
24 TEACHER, AND I AM CURRENTLY ENROLLED IN A FOUR-YEAR NURSING
25 PROGRAM AND I AM IN MY LAST SEMESTER OF THAT PROGRAM.

26 Q ARE YOU CURRENTLY EMPLOYED?

27 A YES, I AM.

28 Q WHAT IS YOUR EMPLOYMENT?

1 A I WORK AT NORTHRIDGE HOSPITAL AS A NURSING
2 ASSISTANT.

3 Q DID THERE COME A TIME WHEN YOU BECAME
4 AFFILIATED WITH THIS CHURCH, CHURCH UNIVERSAL AND
5 TRIUMPHANT?

6 A YES.

7 Q WHEN WAS THAT?

8 A I CAME TO A CONFERENCE IN 1974 AND I WENT TO
9 SUMMIT UNIVERSITY IN JANUARY OF 1975.

10 Q WHEN YOU WENT TO SUMMIT UNIVERSITY IN JANUARY
11 1975, DID YOU KNOW GREGORY MULL?

12 A YES, I DID.

13 Q WAS HE IN THE SAME QUARTER OF SUMMIT UNIVERSITY
14 AS YOU WERE ENROLLED?

15 A YES, HE WAS.

16 Q AFTER YOU FINISHED THAT SUMMIT UNIVERSITY
17 QUARTER IN MARCH OF 1975, WHAT WAS YOUR NEXT AFFILIATION
18 WITH THE CHURCH?

19 A I JOINED THE STAFF OF SUMMIT UNIVERSITY.

20 Q AND FOR HOW LONG WERE YOU ON THE STAFF OF
21 SUMMIT UNIVERSITY?

22 A I WAS A TEACHING ASSISTANT AT SUMMIT UNIVERSITY
23 FOR APPROXIMATELY TWO AND A HALF YEARS.

24 Q SO THAT WOULD BE FROM MARCH OF 1975 FOR THE
25 NEXT TWO AND A HALF YEARS YOU WERE A TEACHING ASSISTANT?

26 A RIGHT.

27 Q WHAT IS A TEACHING ASSISTANT AT SUMMIT
28 UNIVERSITY? WHAT DO YOU DO?

1 A AS A TEACHING ASSISTANT, I WAS RESPONSIBLE FOR
2 WRITING OUTLINES OF LECTURES. I HELPED TO DELIVER AND
3 ORGANIZE THE LECTURES AND I HELPED TO ANSWER QUESTIONS FOR
4 STUDENTS. I PRESENTED THE MATERIAL. I WAS MAKING UP TESTS
5 AND GRADING THE TESTS AND I WAS ALWAYS JUST GENERALLY
6 AVAILABLE FOR ASSISTANCE TO STUDENTS AND STAFF.

7 Q NOW, WHEN YOU WERE AT SUMMIT UNIVERSITY FROM
8 JANUARY TO MARCH OF 1975, AT THAT TIME WERE YOU A STUDENT OR
9 TEACHING ASSISTANT?

10 A FROM JANUARY, 1975, UNTIL MARCH, I WAS A
11 STUDENT.

12 Q SO YOU HAD THE SAME STATUS AT THAT TIME AS MR.
13 MULL?

14 A RIGHT.

15 Q NOW, AFTER YOU CEASED BEING A TEACHING
16 ASSISTANT AT SUMMIT UNIVERSITY, WHAT WAS YOUR NEXT
17 AFFILIATION WITH THE CHURCH?

18 A LET'S SEE. WHEN I FINISHED BEING A TEACHING
19 ASSISTANT, I WORKED OUT PART-TIME, AND I WAS WORKING AS A
20 TELEPHONE OPERATOR AND AS A DECREE TAG COORDINATOR.

21 Q WHEN YOU SAY YOU WORKED OUT PART-TIME, WHAT DO
22 YOU MEAN BY THAT?

23 A I WORKED AS A HIGH SCHOOL TEACHER IN THE LOCAL
24 AREA SO I WORKED PART-TIME AND WORKED ON STAFF PART-TIME.

25 Q AND WERE YOU A STAFF MEMBER AT THAT TIME?

26 A YES, I WAS.

27 Q DID THERE COME A TIME WHEN YOU CEASED BEING A
28 STAFF MEMBER?

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A YES.

Q WHEN WAS THAT?

A APPROXIMATELY I'D SAY ABOUT 1983 -- 1982.

Q AND CURRENTLY WHAT IS THE NATURE OF YOUR
AFFILIATION WITH THE CHURCH?

A I AM A KEEPER OF THE FLAME AND A CHURCH
COMMUNICANT.

Q YOU ARE A MEMBER?

A YES, I AM.

Q NOW, YOU SAID THAT YOU WERE A TAG COORDINATOR
AT ONE POINT?

A RIGHT.

Q WHAT DOES THAT MEAN?

A WELL, WE HAVE DECREES, AND WE HAVE PRAYERS OR
DECREES GOING 24 HOURS A DAY AND WE LIKE TO HAVE ABOUT TEN
PEOPLE IN THESE DECREE SESSIONS. AND SO I WAS RESPONSIBLE
FOR ASKING PEOPLE TO PARTICIPATE AND KEEPING THEM GOING.

Q DID YOU DO THAT AT CAMELOT?

A YES, I DID.

Q NOW, GOING BACK TO 1975, JANUARY, WHEN YOU WENT
TO SUMMIT UNIVERSITY, DID YOU KNOW GREGORY MULL DURING THAT
QUARTER?

A YES. I HAD MET HIM APPROXIMATELY NOVEMBER OF
1974 IN HIS HOME.

Q SO THAT WHEN YOU WENT TO SUMMIT UNIVERSITY IN
JANUARY OF '75, YOU KNEW WHO HE WAS?

A RIGHT.

Q NOW, AT SUMMIT UNIVERSITY IN JANUARY OF '75,

1 WHERE DID YOU LIVE WHILE YOU WERE ATTENDING AS A STUDENT?

2 A WE LIVED IN CARPENTARIA, A PLACE CALLED SINGING
3 SPRINGS, AND THEY WERE CONDOMINIUMS.

4 Q COULD YOU DESCRIBE THE GENERAL LIVING
5 CONDITIONS THAT YOU HAD IN THOSE CONDOMINIUMS?

6 A WELL, THEY WERE VERY NICE. THEY WERE TWO
7 BEDROOMS, THEY WERE AN UPSTAIRS AND A DOWNSTAIRS. I SHARED
8 A BEDROOM WITH ONE OTHER GIRL, AND THEN THERE WERE
9 ANOTHER -- THE TWO OTHER GIRLS IN THE OTHER BEDROOM. THERE
10 WERE FOUR OF US IN THE WHOLE CONDO AND WE EACH HAD OUR OWN
11 BATHROOMS.

12 LET'S SEE, DOWNSTAIRS THERE WAS A LIVING ROOM,
13 A DECK, A KITCHEN, A HALL SPACE AND THEN THERE WAS A POOL,
14 JACUZZI, ALL KIND -- LAUNDRY FACILITIES. IT WAS A NORMAL
15 CONDOMINIUM AREA.

16 Q WAS THE CONDOMINIUM ON THE OCEAN?

17 A IT WAS JUST A FEW MINUTES FROM THE OCEAN. WE
18 USED TO WALK DOWN.

19 Q NOW, WERE THE LIVING ACCOMMODATIONS THAT YOU
20 DESCRIBED THAT YOU EXPERIENCED, WERE THOSE SIMILAR TO WHAT
21 THE OTHER STUDENTS AT SUMMIT UNIVERSITY IN JANUARY TO MARCH,
22 1975, HAD?

23 A YES. WE ALL LIVED THERE.

24 Q NOW, PRIOR TO ATTENDING SUMMIT UNIVERSITY IN
25 JANUARY OF 1975, DID YOU HAVE ANY WAY OF KNOWING WHAT TO
26 EXPECT AS FAR AS THE RULES AND REGULATIONS?

27 A THERE IS A CODE OF CONDUCT THAT WAS SENT TO US
28 IN A PACKET TO STUDENTS, PROSPECTIVE STUDENTS. AND I READ

1 THAT BEFORE I CAME SO I HAD A GENERAL IDEA, BUT I WAS PRETTY
2 NEW AT THE TIME.

3 Q NOW, DURING THE COURSE OF A TYPICAL DAY AT
4 SUMMIT UNIVERSITY IN JANUARY THROUGH MARCH OF 1975, HOW MANY
5 HOURS A DAY DID YOU DECREE?

6 A PROBABLY ABOUT ON AN AVERAGE DAY JUST ABOUT
7 TWO, TWO AND A HALF MAYBE.

8 Q TWO, TWO AND A HALF HOURS?

9 A UH-HUH.

10 Q DID PEOPLE DECREE ON THE BUS ON THE WAY TO
11 CLASSES?

12 A SOMETIMES.

13 Q DID PEOPLE DO OTHER THINGS ON THE BUS ON THE
14 WAY TO CLASSES?

15 A YES.

16 Q LIKE WHAT?

17 A WE TALKED TO EACH OTHER AND SING AND JUST DO
18 WHAT PEOPLE DO ON BUSES.

19 Q WHILE YOU WERE AT SUMMIT UNIVERSITY IN 1975 AS
20 A STUDENT, DID THE STUDENTS HAVE ANY RESTRICTIONS ON THEIR
21 ABILITIES TO TALK TO EACH OTHER?

22 A IN THE CODE OF CONDUCT, IT RECOMMENDS THAT YOU
23 LIMIT YOUR CONVERSATIONS TO THE EXTENT THAT YOU DON'T OVERDO
24 TALKING. IT IS JUST A KIND OF A WASTE OF ENERGY. BUT IT IS
25 A -- AS ON ALL OF THE RULES OF THE CODE OF CONDUCT, IT IS A
26 HONOR FLAME YOU MIGHT SAY. IT IS SOMETHING THAT HAS TO DO
27 WITH A PERSONAL DESIRE TO FULFILL THOSE THINGS.

28 AND SO I THINK EVERYONE JUST INTERPRETED IT THE

1 WAY THAT THEY FELT AND NO ONE -- I NEVER NOTICED ANYONE
2 REALLY, YOU KNOW, BEING ENFORCED TO NOT TALK FOR ANY MORE
3 THAN FIVE MINUTES.

4 Q DID YOU EVER KNOW ANYBODY TO BE DISCIPLINED FOR
5 TALKING TO ANOTHER STUDENT?

6 A I NEVER MET -- I HAVE NEVER SEEN ANYONE
7 DISCIPLINED FOR TALKING TOO MUCH.

8 Q WERE STUDENTS RESTRICTED IN ANY WAY FROM
9 TALKING WITH THEIR INSTRUCTORS?

10 A NO. WE WERE ENCOURAGED TO TALK TO INSTRUCTORS
11 IF WE HAD ANY PROBLEMS OR ANY QUESTIONS OR JUST TO BE
12 FRIENDS.

13 Q DID YOU GET HOMEWORK WHEN YOU WERE AT SUMMIT
14 UNIVERSITY?

15 A SOMETIMES.

16 Q DID YOU GET IT EVERY DAY?

17 A NOT EVERY DAY, NO.

18 Q WHAT TIME DID YOU GET UP IN THE MORNING AT
19 SUMMIT UNIVERSITY?

20 A IT VARIED. BUT USUALLY ABOUT 5:15 OR SO.

21 Q WHAT TIME DID YOU GO TO BED?

22 A WELL, THAT VARIED. BUT SOMETIMES -- IT WAS
23 KIND OF UP TO THE INDIVIDUAL I THINK AS TO WHAT TIME YOU
24 WENT TO BED. SCHOOL WAS GENERALLY OVER AROUND SOMETIMES
25 BEFORE DINNER, SOMETIMES AFTER DINNER. SCHOOL'S GENERALLY
26 OVER AROUND 8:00, 7:00, 8:00. AND IF WE HAD A SERVICE,
27 MAYBE IT WAS OVER AT 9:00, 9:30.

28 AND WE'D TAKE THE BUS HOME AND IT WAS UP TO YOU

1 WHEN YOU WENT TO BED.

2 Q DID YOU FEEL THAT YOU HAD ADEQUATE SLEEP WHILE
3 YOU WERE AT SUMMIT UNIVERSITY?

4 A YES.

5 Q WE HAVE HEARD TESTIMONY THAT STUDENTS WERE NOT
6 ABLE TO DO THEIR HOMEWORK WITHOUT STAYING UP VERY LATE AT
7 NIGHT.

8 IS THAT YOUR RECOLLECTION?

9 A I DON'T RECOLLECT THAT. I DON'T EVER REMEMBER
10 STAYING UP TOO LATE TO DO MY HOMEWORK, BUT I DIDN'T NEED TO.
11 I DON'T KNOW OF ANYBODY ELSE WHO DID.

12 Q DID YOU HAVE CLASSES AT SUMMIT UNIVERSITY ON
13 WEEKENDS?

14 A VERY RARELY.

15 Q WHAT DID YOU DO ON WEEKENDS?

16 A LAUNDRY, SHOPPING, WHATEVER -- LET'S SEE.
17 SOMETIMES WE WENT TO THE BEACH, SOMETIMES WE HAD PICNICS,
18 DANCES. DIFFERENT THINGS.

19 Q DURING THE JANUARY TO MARCH, 1975, SEMESTER
20 WHILE YOU WERE AT SUMMIT UNIVERSITY, DID YOU TAKE ANY TRIPS
21 ANYWHERE?

22 A YES. WE -- WE WENT TO SAN DIEGO FOR A WEEKEND
23 AND I THINK WE WENT AROUND LOS ANGELES AND DID SOME THINGS.

24 Q WHEN YOU WERE AT SUMMIT UNIVERSITY JANUARY TO
25 MARCH, 1975, DID YOU FAST?

26 A YES. SOMETIMES I DID.

27 Q WHO DECIDED IF YOU WOULD ENGAGE IN A PARTICULAR
28 FAST?

1 A WELL, FASTING WAS OFFERED AND RECOMMENDED IF
2 YOU COULD DO IT. BUT IF YOU DIDN'T FEEL LIKE YOU WANTED TO
3 FAST, YOU DIDN'T HAVE TO.

4 Q WERE THERE SOMETIMES PEOPLE WHO DID NOT FAST?

5 A YES.

6 Q DID ANYTHING HAPPEN TO THEM IF THEY DIDN'T
7 FAST?

8 A NO.

9 Q WHEN YOU FASTED, DID YOU HAVE ANYTHING TO EAT
10 OR DRINK DURING THE COURSE OF THE FAST?

11 A OH, YES. YOU WERE OFFERED -- YOU COULD FAST ON
12 APPLE JUICE OR DIFFERENT JUICES, CARROT JUICE, TEAS,
13 ANYTHING BASICALLY THAT YOU WANTED TO FAST ON. THERE WAS
14 ALWAYS SOMETHING PROVIDED FOR YOU TO FAST ON.

15 Q WHO DECIDED WHAT PARTICULAR FOODS OR DRINKS YOU
16 WOULD HAVE DURING A FAST?

17 A WELL, THERE IS USUALLY A GENERAL THING THAT WAS
18 OFFERED. LIKE MAYBE THERE WAS APPLE JUICE OFFERED. BUT IF
19 YOU DIDN'T FEEL YOU COULD FAST ON APPLE JUICE, THEN YOU
20 COULD ASK. I HAD A SUGAR PROBLEM, SO I ASKED IF I COULD
21 FAST ON VEGETABLE JUICES. AND THERE WERE TIMES WHEN I
22 DIDN'T FAST BECAUSE I DIDN'T FEEL I WANTED TO.

23 Q WERE THERE OTHER PEOPLE WHO HAD PARTICULAR
24 NEEDS WITH RESPECT TO FASTING WHERE THEY NEEDED CERTAIN
25 FOODS?

26 A YES.

27 MR. LEVY: I AM GOING TO OBJECT TO THAT, YOUR HONOR.
28 ASKS FOR A HEARSAY.

1 THE COURT: SUSTAINED.

2 Q BY MR. KLEIN: TO YOUR KNOWLEDGE, WERE THERE
3 PEOPLE AT SUMMIT UNIVERSITY IN JANUARY TO MARCH OF 1975 WHO
4 COULD NOT JUST ENGAGE IN A JUICE FAST, THEY NEEDED
5 ADDITIONAL FOOD OR DRINK?

6 A YES, THERE WERE.

7 Q WHAT HAPPENED TO THESE PEOPLE, DO YOU KNOW?

8 MR. LEVY: I AM GOING TO OBJECT. CALLS FOR A
9 CONCLUSION AND IT IS VAGUE AND AMBIGUOUS AS TO WHAT HAPPENED
10 TO THESE PEOPLE.

11 THE COURT: SUSTAINED.

12 Q BY MR. KLEIN: DO YOU KNOW IF THESE PEOPLE WERE
13 GIVEN OTHER FOODS AND DRINKS DURING THE FASTING PERIODS?

14 A YES, I DO KNOW THAT. AND THEY WERE GIVEN OTHER
15 FOOD.

16 Q HOW WOULD YOU DESCRIBE THE QUALITY AND QUANTITY
17 OF THE FOOD AT SUMMIT UNIVERSITY FROM JANUARY TO MARCH,
18 1975, WHEN YOU WERE THERE?

19 A I THOUGHT THE FOOD WAS VERY GOOD, AND I THOUGHT
20 IT WAS VERY BALANCED AND THERE WAS ALWAYS ENOUGH.

21 Q WHAT KIND OF FOOD DID THEY HAVE?

22 A AT THE TIME IT WAS VEGETARIAN, AND FRESH
23 VEGETABLES, FRESH SALADS, CASSEROLES, BEANS, LENTILS, A REAL
24 VARIETY OF FOOD, FRESH FRUITS, GRAINS.

25 Q AS A NURSE, HAVE YOU EVER DONE ANY -- RECEIVED
26 ANY INSTRUCTION WITH RESPECT TO BALANCED DIETS?

27 A YES, I HAVE.

28 Q BASED ON THE INSTRUCTION YOU RECEIVED AS A

1 NURSE, DID YOU RECEIVE A BALANCED DIET AT SUMMIT UNIVERSITY?

2 A VERY MUCH SO, YES.

3 Q IF YOU WANTED TO GET ADDITIONAL FOOD WHEN YOU
4 WENT TO SUMMIT UNIVERSITY, COULD YOU GO OFF CAMPUS AND GET
5 IT?

6 A YES.

7 Q WHILE YOU WERE AT SUMMIT UNIVERSITY IN JANUARY
8 TO MARCH OF '75, DID YOU EVER HEAR ANYBODY COMPLAIN ABOUT
9 THE QUALITY OR THE QUANTITY OF THE FOOD THAT THEY WERE
10 RECEIVING?

11 A I NEVER HEARD ANYBODY COMPLAIN ABOUT IT. TO
12 THE CONTRARY, I USUALLY HEARD PEOPLE SAY THAT THEY LIKED IT.

13 MR. LEVY: I AM GOING TO OBJECT TO THE LAST PART OF
14 HER ANSWER AS NONRESPONSIVE AND SELF-SERVING AND MOVE THAT
15 IT BE STRICKEN.

16 THE COURT: MOTION IS GRANTED. THE LAST PART OF THE
17 WITNESS' ANSWER IS STRICKEN. THE JURY IS DIRECTED TO
18 DISREGARD IT.

19 Q BY MR. KLEIN: DID ANY PEOPLE, TO YOUR
20 KNOWLEDGE, LEAVE SUMMIT UNIVERSITY IN 1975 BEFORE THE
21 COMPLETION OF THE QUARTER?

22 A YES.

23 Q TO YOUR KNOWLEDGE, WAS ANYTHING DONE TO PREVENT
24 THEM FROM LEAVING?

25 A NO.

26 Q HOW WOULD YOU DESCRIBE THE THREE MONTHS THAT
27 YOU SPENT AT SUMMIT UNIVERSITY FROM JANUARY TO MARCH OF
28 1975?

1 A WELL, TO ME IT WAS -- IT WAS A REALLY GREAT
2 EXPERIENCE. IT WAS JUST ONE OF THE BEST THINGS I'VE EVER
3 DONE.

4 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY TO
5 FEAR NONCHURCH MEMBERS?

6 A NO.

7 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY NOT
8 TO COMMUNICATE WITH NONCHURCH MEMBERS?

9 A NO.

10 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY THAT
11 YOU COULD ONLY MAKE YOUR ASCENSION IF YOU STAYED IN CHURCH
12 UNIVERSAL AND TRIUMPHANT?

13 A NO.

14 Q WITH RESPECT TO ALL THE QUESTIONS I HAVE ASKED
15 YOU ABOUT SUMMIT UNIVERSITY FROM JANUARY TO MARCH OF 1975,
16 WOULD YOUR ANSWERS BE ANY DIFFERENT IF I ASKED THOSE
17 QUESTIONS FOR THE YEARS THAT YOU WERE A TEACHING ASSISTANT
18 AT SUMMIT UNIVERSITY, WHICH WOULD BE FROM MARCH, '75,
19 THROUGH THE NEXT TWO AND A HALF YEARS?

20 A NO.

21 Q THERE WERE NO CHANGES IN THE FOOD OR THE COURSE
22 OR THE TEACHINGS DURING THOSE NEXT TWO AND A HALF YEARS AS
23 FAR AS THE THINGS I HAVE BEEN ASKING YOU ABOUT?

24 A NO. I THINK THAT WE HAD MEAT ADDED TO OUR DIET
25 LATER ON.

26 Q NOW AT THE END OF THE QUARTER AT SUMMIT
27 UNIVERSITY, DID EACH EACH STUDENT HAVE TO GIVE A CASH GIFT
28 TO ELIZABETH CLARE PROPHET?

1 A NO.

2 Q ARE YOU AWARE OF ANY PRACTICE THAT OCCURRED AT
3 THE END OF THE SEMESTER WITH RESPECT TO GIVING SOMETHING TO
4 EITHER ELIZABETH OR THE CHURCH?

5 A YES.

6 Q WHAT WAS THE PRACTICE?

7 A WELL, AT THE END OF SUMMIT UNIVERSITY, IN
8 GRATITUDE FOR WHAT WE HAD BEEN GIVEN AND GRATITUDE TO OUR
9 TEACHERS, WE TOOK UP A COLLECTION FROM EACH OTHER AND JUST
10 GOT A GIFT FOR HER.

11 Q WOULD EACH PERSON KNOW WHAT THE OTHERS HAD
12 GIVEN AS FAR AS HOW MUCH THEY ACTUALLY DONATED?

13 A UNLESS THEY DISCUSSED IT WITH EACH OTHER, NO.
14 I NEVER DISCUSSED IT WITH ANYONE.

15 Q WAS THE GIFT ALWAYS GIVEN TO ELIZABETH CLARE
16 PROPHET AT THE END OF THE SEMESTER?

17 A NO. SOMETIMES IT WAS GIVEN TO SUMMIT
18 UNIVERSITY OR THE CHURCH.

19 MR. KLEIN: YOUR HONOR, THIS MIGHT BE A GOOD POINT TO
20 STOP. I AM GOING TO GO INTO --

21 THE COURT: ALL RIGHT. WE WILL RESUME AT 1:30.
22 REMEMBER THE COURT'S ADMONITIONS.

23 (AT 11:57 A.M., A RECESS WAS TAKEN UNTIL
24 1:30 P.M. OF THE SAME DAY.)
25
26
27
28

1 LOS ANGELES, CALIFORNIA; TUESDAY, MARCH 4, 1986 *

2 1:40 P.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 THE COURT: GOOD AFTERNOON.

7
8 ELISSA PATRICIA THEODORE, +

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

11 THE COURT: YOU HAVE BEEN PREVIOUSLY SWORN. YOU ARE
12 STILL UNDER OATH. PLEASE STATE AGAIN YOUR NAME FOR THE
13 RECORD.

14 THE WITNESS: MY NAME IS ELISSA PATRICIA THEODORE.

15 THE COURT: ALL RIGHT. PROCEED.

16 MR. KLEIN: THANK YOU, YOUR HONOR.

17
18 DIRECT EXAMINATION + (RESUMED)

19 BY MR. KLEIN:

20 Q WHEN YOU WERE AT SUMMIT UNIVERSITY IN JANUARY
21 THROUGH MARCH OF 1975, DID YOU HAVE OCCASION TO WRITE A
22 CLEARANCE LETTER?

23 A YES, I DID.

24 Q WHAT WERE STUDENTS TOLD WOULD HAPPEN TO THEIR
25 CLEARANCE LETTER AFTER ELIZABETH CLARE PROPHET READ THEM?

26 A WE WERE TOLD BY THE TEACHING ASSISTANT THAT WE
27 SHOULD WRITE THE CLEARANCE LETTER, PUT IT IN AN ENVELOPE,
28 SEAL THE ENVELOPE, THAT THE LETTER WOULD BE KEPT IN A FILE

1 UNTIL THE CLEARANCE. AT THE TIME OF THE CLEARANCE, THE
2 LETTER WOULD BE READ BY MOTHER, AND THEN THE LETTER WOULD BE
3 TAKEN BY THE TEACHING ASSISTANT AND IMMEDIATELY BURNED.

4 Q AND ALL THAT WOULD HAPPEN DURING THE COURSE OF
5 THAT QUARTER AT SUMMIT UNIVERSITY?

6 A YES.

7 Q BY THE WAY, WHEN YOU SAID "MOTHER," YOU ARE
8 REFERRING TO ELIZABETH CLARE PROPHET?

9 A YES.

10 Q DO YOU HAVE ANY PERSONAL KNOWLEDGE AS TO
11 WHETHER OR NOT THE CLEARANCE LETTERS WERE BURNED?

12 A YES, I DO.

13 Q HOW DO YOU HAVE THAT KNOWLEDGE?

14 A WELL, I WATCHED THEM BEING BURNED.

15 Q HOW DID IT COME ABOUT THAT YOU WATCHED THEM
16 BEING BURNED?

17 A WELL, THE CHAPEL IN SANTA BARBARA WAS FAIRLY
18 SMALL AND THERE WAS A HALLWAY THAT WENT OFF OF THE CHAPEL
19 WHICH WAS OVERFLOW FOR A LOT OF THE STUDENTS. AND I USED TO
20 SIT OUT IN THE HALLWAY A LOT.

21 Q BUT BACK UP A LITTLE BIT. THIS CHAPEL THAT YOU
22 ARE TALKING ABOUT, IS THAT WHERE CLEARANCE LETTERS WOULD BE
23 READ BY ELIZABETH CLARE PROPHET?

24 A YES.

25 Q AND WHEN THEY WERE READ BY ELIZABETH CLARE
26 PROPHET IN THE CHAPEL, WHERE WOULD SHE READ THEM? WHAT PART
27 OF THE CHAPEL?

28 A SHE WOULD SIT AT, I GUESS YOU COULD SAY, THE

1 ALTER. SHE WOULD SIT IN A CHAIR AND READ IT IN FRONT OF US
2 THAT WE SAW HER READING IT.

3 Q AND WHERE WERE YOU WHEN SHE WAS READING THEM,
4 YOU PERSONALLY?

5 A JUST A FEW FEET AWAY FROM HER SITTING IN THE
6 HALL OR IN THE CHAPEL, WHEREVER I HAD DECIDED TO SIT THAT
7 DAY.

8 Q NOW, WAS THERE EVER AN OCCASION -- LET ME
9 WITHDRAW THAT.

10 WHAT WOULD BE THE PROCEDURE WHEREBY SHE WOULD
11 READ THEM AND THEN THEY WOULD BE BURNED? HOW EXACTLY WOULD
12 THAT HAPPEN?

13 A LET'S SEE. A PERSON WOULD HAVE THEIR CLEARANCE
14 THAT DAY AND MOTHER WOULD CALL FOR THEIR FILE. THE FILE
15 WOULD BE BROUGHT TO HER BY A TEACHING ASSISTANT.

16 Q WOULD SHE BE UP ON THE ALTER?

17 A YES. SHE WOULD TAKE THE LETTER, BREAK THE
18 SEAL, READ THE LETTER WHILE THE PERSON WHO WAS HAVING THE
19 CLEARANCE WAS KNEELING, AND SHE WOULD READ THE LETTER. ONCE
20 FINISHED WITH THE LETTER, SHE WOULD HAND THE LETTER TO THE
21 TEACHING ASSISTANT. THE TEACHING ASSISTANT WOULD GO TO THE
22 PLACE WHERE IT WAS TO BE BURNED.

23 Q WHERE WAS THE PLACE WHERE IT WAS TO BE BURNED?
24 WHERE WAS THAT?

25 A IT WAS RIGHT OUTSIDE THE DOORS, THESE LIKE
26 FRENCH DOORS TO THE HALLWAY. THERE WAS LIKE A CERAMIC
27 STOVE, AND THE TEACHING ASSISTANT WOULD GO OUT AND WATCH
28 THE, YOU KNOW, BURN THE LETTER IN THE STOVE.

1 Q FROM WHERE YOU WERE SITTING INSIDE THAT CHAPEL,
2 COULD YOU ACTUALLY SEE THE TEACHING ASSISTANT WHEN SHE
3 BURNED THE LETTERS?

4 A WELL, IT DEPENDED ON WHERE I SAT. MOST OF THE
5 TIME I DID SIT IN THE HALLWAY BECAUSE IT GOT KIND OF STUFFY
6 SOMETIMES FOR ME IN THE CHAPEL. SO I WOULD JUST SIT IN THE
7 HALLWAY AND I WOULD JUST WATCH HER GO BURN THEM. IT WAS,
8 YOU KNOW, IT WAS INTERESTING TO ME.

9 Q COULD YOU ACTUALLY SEE HER BURNING THEM WHEN
10 YOU SAY SAT IN THE HALLWAY?

11 A YES.

12 Q DID YOU SIT IN THE HALLWAY EVERY DAY THE
13 CLEARANCE LETTERS WERE --

14 A NO, I DIDN'T --

15 Q LET ME FINISH MY QUESTION.

16 DID YOU SIT IN THE HALLWAY EVERY DAY THE
17 CLEARANCE LETTERS WERE READ?

18 A NO.

19 Q DO YOU RECALL HOW MANY DAYS CLEARANCE LETTERS
20 WERE ACTUALLY BURNED DURING THAT SEMESTER?

21 A I DON'T REMEMBER HOW MANY DAYS EXACTLY, BUT --

22 Q DO YOU HAVE ANY IDEA WHAT PERCENTAGE OF THE
23 TIME YOU WERE SITTING IN THAT HALLWAY WHERE YOU COULD
24 ACTUALLY SEE THE LETTER BURNED?

25 A PROBABLY ABOUT 80 PERCENT OF THE TIME I WOULD
26 SAY I COULD SEE THEM BEING BURNED.

27 Q DO YOU KNOW AS YOU SIT HERE NOW WHETHER YOU
28 ACTUALLY SAW GREGORY MULL'S LETTER, MR. MULL'S LETTER BEING

1 BURNED?

2 A I DON'T KNOW WHETHER I ACTUALLY SAW HIS LETTER
3 BEING BURNED.

4 Q DURING THE TIME THAT YOU SAT IN THAT HALLWAY
5 AND WERE ABLE TO ACTUALLY WATCH THE TEACHING ASSISTANT BURN
6 THE LETTERS, DID YOU EVER SEE THE TEACHING ASSISTANT DO --
7 TAKE ANY LETTER AND NOT BURN IT?

8 A NO.

9 Q NOW, THERE CAME A TIME WHEN YOU BECAME A
10 TEACHING ASSISTANT AT SUMMIT UNIVERSITY?

11 A YES.

12 Q AND THAT WAS RIGHT AFTER THAT MARCH, 1975, END
13 OF THAT SEMESTER THAT YOU ATTENDED?

14 A RIGHT.

15 Q WHEN YOU BECAME A TEACHING ASSISTANT, DID YOU
16 HAVE ANY JOB OR DUTIES WITH RESPECT TO CLEARANCE LETTERS?

17 A YES, I DID.

18 Q WHAT WAS YOUR JOB?

19 A MY JOB WAS TO BURN THE CLEARANCE LETTERS.

20 Q AND FOR HOW LONG DID YOU AS A TEACHING
21 ASSISTANT HAVE THE JOB OF BURNING THE CLEARANCE LETTERS?
22 FROM WHEN TO WHEN?

23 A WELL, FROM THE WHOLE TIME I WAS A TEACHING
24 ASSISTANT FOR TWO AND A HALF YEARS. FROM THE TIME I STARTED
25 IN MARCH OF '75 UNTIL, WELL, TWO AND A HALF YEARS LATER.

26 Q AND FROM MARCH OF '75 UNTIL TWO AND A HALF
27 YEARS LATER, DID YOU PERSONALLY BURN ALL THE CLEARANCE
28 LETTERS?

1 A YES.

2 Q IN FEBRUARY, 1978, DID YOU WORK AS A PUBLIC
3 SCHOOL TEACHER IN CALIFORNIA?

4 A YES, I DID.

5 Q WHAT DID YOU TEACH?

6 A ENGLISH AND SPEECH.

7 Q WHERE?

8 A LET'S SEE. I TAUGHT AT CALABASAS HIGH SCHOOL
9 AS A SUBSTITUTE TEACHER, AGOURA HIGH SCHOOL, SAN MARINO IN
10 THE SAN MARINO SCHOOL DISTRICT, IN THE PASADENA SCHOOL
11 DISTRICT.

12 Q AT THAT TIME WHEN YOU WERE TEACHING, WHAT WAS
13 YOUR AFFILIATION WITH THE CHURCH AT THAT TIME?

14 A I WAS STILL A STAFF MEMBER, BUT PART-TIME.

15 Q DID BEING A PART-TIME STAFF MEMBER IN ANY WAY
16 INTERFERE WITH YOUR ABILITY TO BE A TEACHER IN THE
17 CALIFORNIA SCHOOL SYSTEM?

18 A NO.

19 Q NOW, DID THERE COME A TIME WHEN YOU STOPPED
20 TEACHING IN THE CALIFORNIA SCHOOL SYSTEM?

21 A YES.

22 Q WHEN WAS THAT?

23 A PROBABLY AFTER ABOUT SIX MONTHS.

24 Q WHY DID YOU STOP AT THAT TIME?

25 A I WANTED TO COME BACK ON STAFF FULL-TIME.

26 Q TO THE CHURCH?

27 A YEAH. I WAS OFFERED ANOTHER JOB SO I ASKED TO
28 COME BACK.

1 Q DID YOU ASK TO COME BACK OR WERE YOU TOLD THAT
2 YOU HAD TO COME BACK?

3 A NO. I WAS OFFERED THE JOB. AND IF I WANTED TO
4 COME BACK, I COULD.

5 Q WHEN YOU CAME BACK, IS THAT WHEN YOU WERE A TAG
6 COORDINATOR?

7 A I WAS A TAG COORDINATOR AND AN OPERATOR.

8 Q NOW, DURING THE YEARS 1979 TO 1980, DID YOU
9 LIVE AT CAMELOT?

10 A YES, I DID.

11 Q DID YOU KNOW GREGORY MULL?

12 A YES, I DID.

13 Q HOW DID YOU KNOW HIM?

14 A WELL, I HAD KNOWN HIM BECAUSE I HAD GONE TO
15 SUMMIT UNIVERSITY WITH HIM AND I HAD AN OFFICE IN THE CHAPEL
16 OF THE HOLY GRAIL ON THE SAME FLOOR THAT GREGORY WAS -- HAD
17 HIS OFFICE. IN FACT, HIS OFFICE WAS RIGHT ACROSS FROM MINE.
18 AND WE USED TO TALK OCCASIONALLY.

19 Q THIS IS IN 1979 AND '80 AT CAMELOT?

20 A RIGHT.

21 Q HIS OFFICE WAS NEAR YOUR OFFICE?

22 A YES.

23 Q HAD YOU -- DID YOU HAVE OCCASION TO BE IN HIS
24 OFFICE?

25 A YES.

26 Q ON MORE THAN ONE OCCASION?

27 A YES.

28 Q WAS THE SIZE OF HIS OFFICE BIGGER OR SMALLER

1 THE SAME COMPARED TO THE SIZE OF YOUR OFFICE?

2 A IT WAS THE SAME SIZE AS MY OFFICE.

3 Q DO YOU KNOW THE DIMENSIONS OF THAT OFFICE,
4 EITHER YOURS OR HIS SINCE THEY WERE THE SAME?

5 A I COULD ESTIMATE IT IF YOU WANT ME TO.

6 Q WAS IT BIGGER THAN EIGHT BY EIGHT?

7 A YES.

8 Q GIVE US AN ESTIMATE AS TO WHAT SIZE THE OFFICE
9 WAS.

10 A I WOULD THINK IT WOULD BE ABOUT 10 -- 10, 11 BY
11 12 OR 13. SOMETHING LIKE THAT.

12 Q DURING THE TIME THAT YOU HAD AN OFFICE NEAR
13 GREGORY MULL'S OFFICE AT CAMELOT, DID YOU HAVE GENERAL
14 CONVERSATIONS WITH HIM?

15 A YES.

16 Q DID HE EVER COMPLAIN ABOUT THE FOOD AT CAMELOT?

17 A NOT TO ME.

18 Q DID HE EVER SAY ANYTHING ABOUT ABOUT DECREERING
19 TO YOU?

20 A THERE WAS ONLY ONE TIME THAT HE MENTIONED THAT
21 WE HAD ANY DISCUSSION ABOUT DECREES.

22 Q WHAT HAPPENED?

23 A WELL, I WAS A TAG COORDINATOR AND --

24 Q JUST TO BE CLEAR, A TAG COORDINATOR, WHY DON'T
25 YOU TELL US AGAIN WHAT THAT IS.

26 A OKAY. WELL, DECREES ARE A FORM OF PRAYER AND
27 WE KEEP A 24-HOUR DECREE SESSION GOING. AND IT WAS MY JOB
28 TO ASK PEOPLE TO BE A PART OF THE TAG, TO DECREE AND TO GET

1 ABOUT TEN PEOPLE.

2 Q IF YOU HAD TEN PEOPLE, WOULD SOME OF THEM
3 DECREE FOR LIKE FROM 5:00 TO 7:00 AND THEN SOME DECREE FROM
4 7:00 TO 9:00; IS THAT WHAT A TAG IS?

5 A BASICALLY, YEAH.

6 Q YOU TRY TO FILL UP YOUR WHOLE 24 HOURS?

7 A RIGHT.

8 Q NOW WOULD YOU CONTINUE AS TO WHAT THAT
9 CONVERSATION WAS WITH MR. MULL, PLEASE.

10 A WELL, IN THE COURSE OF MY DAY, I WOULD GO
11 AROUND AND ASK PEOPLE TO DO A TAG. AND I ASKED -- THAT
12 PARTICULAR MORNING I WAS WALKING UP THE STEPS OF THE CHAPEL
13 OF HOLY GRAIL AND I RAN INTO GREGORY. AND I SAID, YOU KNOW,
14 "GOOD MORNING. WOULD YOU BE ABLE TO DO A TAG THIS MORNING?"

15 AND I HAD ALWAYS EXPERIENCED HIM AS BEING A
16 VERY PLEASANT PERSON. BUT AT THAT PARTICULAR TIME HE WAS
17 VERY ANGRY, AND HE JUST WAS -- HE LOOKED AT ME VERY --
18 ACTUALLY QUITE THREATENINGLY AND SAID, "DON'T EVER ASK ME TO
19 DO A TAG. I WILL DO IT WHEN I WANT TO."

20 AND I WAS SCARED BY THAT AND I NEVER ASKED HIM
21 TO DO THAT AGAIN. I COULDN'T UNDERSTAND WHY HE SAID THAT.

22 Q DO YOU KNOW IF ANYBODY FORCED HIM TO DO A TAG
23 AFTER THAT?

24 A NO, BECAUSE I WAS IN CHARGE OF TAGS AND I NEVER
25 ASKED HIM AGAIN.

26 Q IS THAT THE ONLY RESPONSE THAT YOU MADE TO
27 THAT, TO JUST NOT ASK HIM AGAIN?

28 A YEAH. I FELT THAT IF HE DIDN'T WANT TO DO

1 THEM, HE SHOULDN'T HAVE TO DO IT.

2 Q WHEN YOU WERE AT CAMELOT IN 1979 TO 1980, CAN
3 YOU GIVE US AN IDEA OF HOW MANY HOURS OF SLEEP YOU HAD A
4 NIGHT?

5 A PROBABLY BETWEEN SEVEN AND EIGHT, SOMETIMES SIX
6 MAYBE.

7 Q WHO DETERMINED HOW MANY HOURS YOU SLEPT EACH
8 NIGHT?

9 A ME.

10 Q HOW MANY HOURS A DAY DID YOU SPEND DECREERING AT
11 CAMELOT FROM '79 TO '80?

12 A IT WOULD DEPEND. IF WE HAD A SERVICE, I WOULD
13 DECREE MORE. PROBABLY ON AN AVERAGE OF MAYBE THREE HOURS A
14 DAY.

15 Q WHEN YOU WERE IN GREGORY MULL'S ROOM, WOULD YOU
16 EVER NOTICE WHERE HE SLEPT?

17 A WELL, I REMEMBER THE FIRST TIME I WENT INTO HIS
18 OFFICE, HE WAS VERY PROUD OF HIS OFFICE BECAUSE HE HAD, YOU
19 KNOW, PRACTICALLY DONE THE IMPOSSIBLE, I GUESS YOU COULD
20 SAY. HE WAS VERY CREATIVE WITH HIS SPACE.

21 HE WAS AN ARCHITECT, AND HE HAD CREATED LIKE A
22 BUNK BED ON A TYPE OF THING WHERE HE WOULD HAVE HIS BED AND
23 HE WOULD HAVE LIKE THIS DRAWING BOARD OVER IT SO YOU
24 COULDN'T SEE THAT THERE WAS A BED. AND I ADMIRER THE FACT
25 THAT HE HAD THE INGENUITY TO DEVISE SUCH A THING FOR
26 HIMSELF. AND HE WAS REAL PROUD OF IT AND IT WAS REAL NICE
27 IN THERE.

28 Q WAS -- ARE YOU CERTAIN THERE WAS A BED IN HIS

1 ROOM?

2 A YES.

3 Q YOU DESCRIBED FOR US BEFORE WHAT YOU THOUGHT
4 ABOUT THE FOOD AT SUMMIT UNIVERSITY. WAS IT ANY DIFFERENT
5 AT CAMELOT IN '79 THROUGH '80?

6 A NO. IT WAS VERY GOOD, VERY BALANCED. THERE
7 WAS ALWAYS ENOUGH. YOU COULD HAVE AS MUCH AS YOU WANTED.
8 IT -- IT WAS TASTY.

9 Q WITH RESPECT TO FASTING, WAS THAT -- WITHDRAWN.
10 WITH RESPECT TO FASTING, WERE THERE TIMES THAT
11 YOU FASTED IN 1979 THROUGH 1980 WHEN YOU LIVED AT CAMELOT?

12 A ME PERSONALLY?

13 Q YES.

14 A UH-HUH. THERE WERE TIMES WHEN I FASTED.

15 Q WHO DETERMINED WHETHER YOU WOULD TAKE PART IN A
16 PARTICULAR FAST DURING THOSE YEARS AT CAMELOT?

17 A I DID.

18 Q IF YOU DID TAKE PART IN A PARTICULAR FAST, WHO
19 DETERMINED WHAT FOOD OR DRINK YOU WOULD HAVE DURING THAT
20 PARTICULAR FAST?

21 A I DID.

22 Q WERE THERE EVER TIMES THAT THEY HAD A FAST THAT
23 YOU DIDN'T TAKE PART IN IT?

24 A OH, YES.

25 Q ANYBODY EVER DISCIPLINE YOU FOR THAT?

26 A NO.

27 Q IN DECREEEING, I TAKE IT YOU HAVE DONE THAT MANY
28 TIMES OVER THE YEARS?

1 A YES.

2 Q HAVE YOU EVER FELT THAT DECREERING LESSENE YOUR
3 ABILITY TO CONTROL YOUR OWN THOUGHTS AND ACTIONS?

4 A NOT AT ALL. IT -- DECREERING IS TO ME A FORM OF
5 PRAYER AND IT MAKES ME FEEL CLOSER TO GOD. SO IT ENHANCES
6 MY OPPORTUNITY TO COMMUNE WITH GOD.

7 Q WHEN YOU LIVED AT CAMELOT IN 1979 TO 1980, HOW
8 MANY HOURS A DAY DID YOU WORK?

9 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. I THINK
10 THAT'S BEEN ASKED AND ANSWERED SEVERAL TIMES. IT IS
11 BECOMING A LITTLE BIT CUMULATIVE.

12 THE COURT: I THOUGHT YOU COVERED THIS.

13 MR. KLEIN: I DON'T BELIEVE I COVERED FOR CAMELOT. I
14 THINK I ASKED ABOUT SUMMIT UNIVERSITY.

15 THE COURT: ALL RIGHT.

16 MR. KLEIN: AND I ASKED HER FOR DECREERING AND
17 SLEEPING, BUT I DON'T BELIEVE I ASKED HER FOR WORKING. IT
18 IS ONLY GOING TO BE ONE QUESTION IF YOUR HONOR WOULD --

19 THE COURT: ALL RIGHT.

20 Q BY MR. KLEIN: DO YOU REMEMBER HOW MANY HOURS A
21 DAY YOU WORKED?

22 A I WORKED AN AVERAGE DAY EIGHT HOURS. AND IF I
23 FELT I HAD MORE TO DO, I WORKED A LITTLE BIT MORE.

24 Q AT CAMELOT IN 1979 TO 1980, DID YOU ENGAGE IN
25 ANY SOCIAL ACTIVITIES?

26 A YES.

27 Q WHAT?

28 A WELL, WE HAD MOVIES, AND WALTZES SOMETIMES,

1 PICNICS, SOFTBALL GAMES. THERE IS A SWIMMING POOL. IN THE
2 SUMMERTIME I WOULD TEACH THE CHILDREN TO SWIM AND SWIM
3 MYSELF AND THERE IS TENNIS COURTS THAT YOU CAN PLAY TENNIS
4 ON. VOLLEYBALL GAMES.

5 MR. KLEIN: YOUR HONOR, AT THIS TIME I AM GOING TO
6 SHOW THE WITNESS WHAT'S BEEN MARKED 81 AND 85 FOR
7 IDENTIFICATION.

8 MR. LEVY: WHERE IS THE ONE WITH THE DUCK?

9 Q BY MR. KLEIN: LOOKING AT THE TWO PHOTOGRAPHS
10 THAT HAVE BEEN MARKED 81 AND 85 FOR IDENTIFICATION, FIRST,
11 IS 81 A FAIR AND ACCURATE REPRODUCTION OF THE SWIMMING POOL
12 AT CAMELOT?

13 A YES.

14 Q IS 85 A FAIR AND ACCURATE REPRODUCTION OF THE
15 SPORTS FIELD AT CAMELOT?

16 A YES.

17 MR. KLEIN: YOUR HONOR, I WOULD ASK THAT THEY BE
18 RECEIVED INTO EVIDENCE.

19 MR. LEVY: WE HAVE NO OBJECTION, YOUR HONOR. THEY
20 ARE NICE PICTURES.

21 THE COURT: THEY ARE RECEIVED.

22 (RECEIVED EVID: ^ EXHIBITS 81 AND 85,
23 - - - - - ^ PHOTOGRAPHS)

24 Q BY MR. KLEIN: NOW, WHEN YOU LIVED AT CAMELOT,
25 WERE THERE -- WERE YOU ALLOWED TO HAVE CONTACTS WITH FAMILY
26 AND FRIENDS WHO WERE NONCHURCH MEMBERS?

27 A YES. VERY MUCH SO. IN FACT I PERSONALLY WAS
28 VERY MUCH ENCOURAGED TO KEEP CONTACT WITH MY FAMILY.

1 Q WHO ENCOURAGED YOU TO DO THAT?

2 A MOTHER. SHE PERSONALLY ENCOURAGED ME TO KEEP
3 CONTACT WITH MY FAMILY AND TO VISIT MY FAMILY, ESPECIALLY MY
4 MOTHER EVERY SUMMER.

5 Q DID YOU IN FACT VISIT YOUR FAMILY WHILE YOU
6 WERE LIVING AT CAMELOT?

7 A YES, I DID.

8 Q DID YOU HAVE PHONE CALLS, CONVERSATIONS WITH
9 FAMILY AND FRIENDS WHILE YOU LIVED AT CAMELOT?

10 A YES, I DID.

11 Q DURING YOUR ENTIRE ASSOCIATION WITH THE CHURCH,
12 WAS THERE EVER A TIME WHEN THERE WERE ANY -- OTHER THAN
13 MAYBE WHEN YOU WENT TO SUMMIT UNIVERSITY, WAS THERE EVER A
14 TIME WHEN THERE WERE ANY RESTRICTIONS AT ALL ON CONTACT WITH
15 FAMILY AND FRIENDS WHO WERE NONCHURCH MEMBERS?

16 A NOT FOR ME. THERE WAS NEVER ANY IMPOSITION OF
17 ANY RESTRICTION.

18 Q NOW WHEN YOU WENT TO SUMMIT UNIVERSITY IN
19 JANUARY THROUGH MARCH OF 1975, WERE THERE ANY RESTRICTIONS
20 ON CONTACT WITH FAMILY AND FRIENDS?

21 A NO.

22 Q WHEN YOU WERE AT SUMMIT UNIVERSITY, WERE YOU
23 ALLOWED TO SEE MOVIES OFF CAMPUS?

24 A YES.

25 Q WAS THERE ANY LIST OF BANNED MOVIES?

26 A THERE WAS NO LIST. BUT I MEAN WE ARE A
27 RELIGIOUS COMMUNITY SO WE WOULDN'T NECESSARILY PARTAKE OF
28 LEWD MOVIES. I MEAN, YOU KNOW. I HAVE ALWAYS WANTED TO SEE

1 WHOLESOME MOVIES, SO THAT IS WHAT I LOOK FOR WHEN I GO TO
2 THE MOVIES.

3 Q WAS THERE ACTUALLY A LIST THAT EVERYONE WENT
4 AROUND THESE ARE BANNED MOVIES OR ANYTHING LIKE THAT?

5 A NO, NOT THAT I KNOW OF.

6 Q WERE THERE RECOMMENDED MOVIES?

7 A YES, THERE WERE RECOMMENDED MOVIES.

8 Q WAS THAT ACTUALLY A LIST SENT AROUND SAYING
9 THESE ARE RECOMMENDED MOVIES?

10 A NO. WHEN A GOOD MOVIE CAME OUT, SOMEBODY WOULD
11 SAY, "WHY DON'T YOU GO SEE A MOVIE," SO WE WOULD GO SEE THE
12 MOVIE IF YOU WANTED TO.

13 Q DID THERE COME A TIME WHEN YOU DECIDED YOU
14 WANTED TO GO TO NURSING SCHOOL?

15 A YES.

16 Q WHEN WAS THAT?

17 A IN PROBABLY AROUND MARCH -- NO. IT WAS AROUND
18 JANUARY OR MAYBE IT WAS -- OKAY. IT WAS ABOUT DECEMBER OF
19 '81.

20 Q DID ANYONE FROM THE CHURCH DO OR SAY ANYTHING
21 TO PREVENT YOU FROM GOING TO NURSING SCHOOL?

22 A NO. I WAS ENCOURAGED TO GO TO NURSING SCHOOL.

23 Q WHEN YOU WENT TO NURSING SCHOOL, DID YOU
24 CONTINUE TO LIVE AT CAMELOT?

25 A NO. THE FIRST SEMESTER THAT I WAS AT NURSING
26 SCHOOL, I LIVED AT OUR ASHRAM OR OUR TEACHING CENTER IN LOS
27 ANGELES. AND AFTER THE FIRST SIX MONTHS, THAT TEACHING
28 CENTER WAS CLOSED AND SOLD. SO I FOUND MY OWN HOUSING AND

1 I'VE LIVED ON MY OWN SINCE.

2 Q YOU LIVE IN NONCHURCH HOUSING AT THIS TIME?

3 A YES. I LIVE IN A CONDOMINIUM.

4 Q HOW WOULD YOU DESCRIBE YOUR EXPERIENCE IN THE
5 YEARS YOU LIVED AT CAMELOT?

6 A WELL, MY EXPERIENCE IN THE YEARS THAT I LIVED
7 AND WORKED AT CAMELOT AND MY AFFILIATION WITH THE CHURCH I
8 THINK HAVE BEEN THE MOST WONDERFUL OF MY LIFE. AND I CAN
9 TRULY SAY FROM MY HEART THAT WHEN I CAME INTO THE TEACHINGS,
10 I WAS REALLY SEEKING AND SEARCHING FOR THE TRUTH. AND I
11 FEEL THAT I HOLD A VERY HIGH STANDARD. AND I LOOKED FOR A
12 LONG TIME.

13 AND WHEN I CAME TO SUMMIT UNIVERSITY, I WAS --
14 I HAD EXPERIENCED A LOT OF PAIN IN MY CHILDHOOD AND I WAS
15 REALLY LOOKING FOR THE TRUTH AND FOR ANSWERS. AND WHEN I
16 CAME TO MY FIRST CONFERENCE AND TO SUMMIT UNIVERSITY AND
17 THEN JOINED THE STAFF, IT HAS BEEN TRULY HEALING FOR ME AND
18 A BLESSING BECAUSE I FEEL THAT I HAVE GROWN STRONG ENOUGH TO
19 BE A NURSE AND NOW TO START HELPING OTHER PEOPLE. WHEREAS I
20 HAVE BEEN SERVED, NOW I WOULD LIKE TO TURN AROUND AND SERVE.

21 Q DOES THE CHURCH TEACH THAT ELIZABETH CLARE
22 PROPHET IS PERFECT AND DOESN'T MAKE MISTAKES?

23 A NO, NOT AT ALL. IN FACT, I THINK WE HAVE
24 ALWAYS BEEN TOLD THAT, ESPECIALLY BY MOTHER, THAT THE TRUE
25 TEACHER, THE TRUE GURU WILL ALWAYS TELL YOU THAT YOU SHOULD
26 SURPASS HER OR HIM, THAT YOU CAN DO GREAT WORKS YOURSELF AND
27 THAT YOU SHOULD STRIVE TO DO SO. AND THAT WE ARE ALL HUMAN
28 IN THIS LIFE AND THAT WE ARE STRIVING FOR UNION WITH GOD AND

1 PERFECTIION. BUT THAT WE -- WE HAVE TO STRIVE CONSTANTLY FOR
2 THAT.

3 Q DOES THE CHURCH EVER TEACH THAT YOU CAN'T MAKE
4 YOUR ASCENSION IF YOU ARE NOT A MEMBER OF THE CHURCH, OF
5 THIS CHURCH?

6 A NO.

7 Q DID THE CHURCH EVER TEACH THAT YOU WILL DIE IF
8 YOU LEAVE THE CHURCH?

9 A NO.

10 Q DID THE CHURCH EVER TEACH THAT YOU WILL HAVE
11 10,000 REEMBODIMENTS IF YOU LEAVE THE CHURCH?

12 A NO.

13 Q DID THE CHURCH EVER TEACH YOU TO FEAR
14 NONMEMBERS?

15 A NOT AT ALL.

16 Q DID THE CHURCH EVER TEACH YOU NOT TO
17 COMMUNICATE WITH NONMEMBERS?

18 A NO. IN FACT -- NO. YOU CARRY ON AS A NORMAL
19 PERSON WITH PEOPLE NO MATTER WHO THEY ARE.

20 Q THE JURY HAS BEEN TOLD THAT CHURCH MEMBERS ARE
21 ROBOTS, ARE MANIPULATED AND CONTROLLED BY ELIZABETH CLARE
22 PROPHET AND OTHER CHURCH OFFICIALS.

23 DOES ANYBODY MANIPULATE OR CONTROL YOU?

24 A NO ONE MANIPULATES AND CONTROLS ME.

25 Q ARE YOU SURE OF THAT?

26 A I'M POSITIVE.

27 Q DO YOU BELIEVE YOU HAVE THE FREE WILL TO LEAVE
28 OR STAY WITH THE CHURCH ANY TIME YOU WANT, TO LEAVE THE

1 CHURCH IF YOU WANT?

2 A YES.

3 Q ANY DOUBT ABOUT THAT?

4 A NO.

5 Q ARE YOU FEARFUL IF YOU LEAVE THE CHURCH, THAT
6 OTHER CHURCH MEMBERS ARE PHYSICALLY OR SPIRITUALLY GOING TO
7 DO SOMETHING TO YOU?

8 A NO, I HAVE NO FEAR OF THAT.

9 Q DURING THE YEARS YOU HAVE BEEN A CHURCH MEMBER,
10 HAVE MEMBERS OF THE STAFF LEFT THE CHURCH TOTALLY?

11 A YES, THEY HAVE.

12 Q ARE YOU AWARE OF ANY CHURCH MEMBERS EVER
13 HARASSING OR INTIMIDATING OR THREATENING STAFF MEMBERS WHO
14 HAVE LEFT?

15 A NO. IT ISN'T SOMETHING THAT WOULD BE IN THE
16 TENETS OF OUR BELIEFS TO HARASS SOMEBODY.

17 MR. LEVY: I AM GOING TO OBJECT TO THE LATTER PORTION
18 OF HER ANSWER AND --

19 THE COURT: SHE'S ANSWERED THE QUESTION. TIME FOR
20 ANOTHER QUESTION.

21 Q BY MR. KLEIN: ARE YOU AWARE OF --

22 THE COURT: JUST A SECOND. EVERYTHING AFTER THE WORD
23 "NO" IS STRICKEN. THE JURY IS DIRECTED TO DISREGARD IT.
24 ALL RIGHT.

25 Q BY MR. KLEIN: ARE YOU AWARE OF ELIZABETH CLARE
26 PROPHET OR ANY CHURCH OFFICIAL EVER DOING ANYTHING TO EVEN
27 SUGGEST THAT CHURCH MEMBERS SHOULD HARASS OR THREATEN OR
28 INTIMIDATE PEOPLE WHO HAVE LEFT THE CHURCH?

1 A ABSOLUTELY NOT.

2 Q ARE THERE SOMETIMES MEETINGS BY STAFF MEMBERS
3 ABOUT PEOPLE WHO HAVE LEFT THE CHURCH?

4 A WE HAVE HAD MEETINGS ABOUT PEOPLE WHO HAVE LEFT
5 THE CHURCH.

6 Q UNDER WHAT CIRCUMSTANCES HAVE THERE BEEN SUCH
7 MEETINGS ABOUT PEOPLE WHO HAVE LEFT THE CHURCH?

8 A THE ONLY TIMES THAT WE AS A STAFF WOULD GET
9 TOGETHER AND DISCUSS A STAFF MEMBER LEAVING WOULD BE IF THAT
10 STAFF MEMBER OR INDIVIDUAL HAD BEGUN TO HARASS THE CHURCH
11 THEMSELVES, HAD BECOME A PROBLEM OR, YOU KNOW, HAD
12 DEFINITELY EITHER THREATENED OR CREATED TREMENDOUS PROBLEM.

13 AND WHAT WOULD HAPPEN IN THE STAFF MEETING
14 WOULD BE THAT THAT PARTICULAR INSTANCE WOULD BE EXPLAINED OR
15 AN ARTICLE IN THE PAPER WOULD BE SHOWN.

16 Q WERE THERE ANY SUCH MEETINGS HELD ABOUT GREGORY
17 MULL WHEN HE LEFT THE CHURCH?

18 A YES.

19 Q DO YOU RECALL WHAT WAS SAID AT THE MEETING?

20 A I DON'T RECOLLECT EXACTLY WHAT WAS SAID AT THE
21 MEETING, BUT I REMEMBER THAT THERE WAS A MEETING BETWEEN
22 MOTHER AND SOME BOARD MEMBERS AND GREGORY. BUT I DON'T
23 REALLY REMEMBER WHAT WAS SAID IN THAT MEETING. I WASN'T
24 PRESENT AT THE MEETING.

25 Q I AM SAYING WAS THERE A MEETING THAT YOU WERE
26 PRESENT AT WHERE GREGORY MULL WAS DISCUSSED OR HIS LEAVING
27 WAS DISCUSSED IN ANY WAY?

28 A YES.

1 Q WHAT WAS SAID AT THAT MEETING THAT YOU WERE
2 PRESENT AT?

3 A JUST THE FACT THAT HE WAS VERY UNHAPPY, WAS
4 DEMANDING MONEY FROM THE CHURCH AND WAS VERY NEGATIVE
5 TOWARDS THE CHURCH.

6 Q WAS A TAPE PLAYED AT THAT MEETING?

7 A YES.

8 Q DO YOU RECALL WHAT THAT WAS A TAPE OF?

9 A IT WAS THE TAPE OF GREGORY AND MOTHER AND
10 SEVERAL OF THE BOARD WHO WERE WITH HIM AT THE TIME.

11 Q DO YOU RECALL IF THE OTHER BOARD MEMBERS WHO
12 WERE ON THAT TAPE WERE ED FRANCIS AND MONROE SHEARER?

13 A YES, I BELIEVE IT WAS.

14 Q DO YOU PRESENTLY OWN JEWELRY?

15 A YES, I DO.

16 Q HAVE YOU EVER HAD IT VALUED?

17 A A COUPLE OF PIECES I'VE HAD VALUED, BUT THEY
18 WERE LEFT TO ME FROM MY FAMILY SO THE VALUE OF IT IS REALLY
19 PERSONAL.

20 Q CAN YOU GIVE US SOME APPROXIMATION --

21 MR. LEVY: I AM GOING TO OBJECT TO THIS LINE OF
22 QUESTIONING, YOUR HONOR. I FAIL TO SEE ANY RELEVANCE.

23 MR. KLEIN: YOUR HONOR, I -- IT WILL BECOME VERY
24 RELEVANT IN ONE OR TWO QUESTIONS.

25 THE COURT: ALL RIGHT.

26 MR. KLEIN: THANK YOU.

27 Q DO YOU KNOW AN APPROXIMATE VALUE OF THAT
28 JEWELRY THAT YOU HAVE?

1 A I RECENTLY HAD IT ESTIMATED AND I THINK IT IS
2 ABOUT — THE JEWELRY ITSELF IS ABOUT \$30,000.

3 Q DID THERE EVER COME A TIME WHEN YOU OFFERED
4 THAT JEWELRY TO ELIZABETH CLARE PROPHET?

5 A YES. AT ONE TIME I FELT THAT I JUST WANTED
6 TO — I LOVED HER SO MUCH THAT I WANTED TO GIVE IT TO HER.

7 Q WHAT HAPPENED WHEN YOU OFFERED IT TO HER?

8 A WELL, I SENT HER A NOTE AND TOLD HER THAT I
9 WANTED TO MEET WITH HER SO I CAN GIVE IT TO HER.

10 MR. LEVY: OBJECTION, YOUR HONOR. I STILL FAIL TO
11 SEE ANY RELEVANCE.

12 THE COURT: I THINK THE DETAILS ARE NOT PARTICULARLY
13 IMPORTANT. WHY DON'T YOU GET TO THE POINT.

14 Q BY MR. KLEIN: DID ELIZABETH CLARE PROPHET
15 ACCEPT THE JEWELRY THAT YOU OFFERED TO HER?

16 A NO. SHE WOULDN'T TAKE IT. SHE SAID THAT I
17 SHOULD KEEP IT AND THAT SOME DAY I CAN --

18 MR. LEVY: I AM GOING TO OBJECT AND ASK THAT THE
19 BALANCE OF THIS ANSWER BE STRICKEN AS NONRESPONSIVE. THE
20 QUESTION CALLED FOR A YES OR NO ANSWER.

21 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

22 Q BY MR. KLEIN: WHAT DID SHE TELL YOU AS TO WHY
23 SHE WOULDN'T ACCEPT THE JEWELRY?

24 MR. LEVY: I AM GOING TO OBJECT WITH REGARD TO
25 RELEVANCE, YOUR HONOR. BESIDE, IT WOULD BE HEARSAY AS TO
26 WHAT SHE WAS TOLD.

27 THE COURT: SUSTAINED.

28 Q BY MR. KLEIN: HAS ANY CHURCH OFFICIAL OR

1 MEMBER EVER TOLD YOU TO LIE OR STEAL OR CHEAT OR DO ANYTHING
2 THAT YOU CONSIDERED TO BE DISHONEST?

3 A NO.

4 Q YOU ARE CURRENTLY NOT A CHURCH STAFF MEMBER?

5 A THAT IS TRUE.

6 Q DO YOU HAVE ANY PLANS IN THE FUTURE WITH
7 RESPECT TO BEING A CHURCH STAFF MEMBER?

8 A I HOPE THAT WHEN I GRADUATE FROM NURSING
9 SCHOOL, I WILL JOIN THE STAFF AGAIN FULL-TIME.

10 Q IS THAT YOUR CHOICE?

11 A VERY MUCH SO.

12 Q ARE YOU FREE, AS FAR AS YOU ARE AWARE, TO DO
13 WHATEVER YOU WANT WHEN YOU GRADUATE FROM NURSING SCHOOL?

14 A YES, I AM.

15 MR. KLEIN: THANK YOU.

16 I HAVE NO FURTHER QUESTIONS.

17 THE COURT: ALL RIGHT.

18

19 CROSS-EXAMINATION +

20 BY MR. LEVY:

21 Q YOU REFER TO ELIZABETH CLARE PROPHET FRANCIS AS
22 MOTHER; IS THAT CORRECT?

23 A YES, I DO.

24 Q HOW ABOUT ED FRANCIS? IS HE FATHER OR DADDY OR
25 WHAT?

26 A HE IS EDWARD FRANCIS.

27 Q ISN'T HE THE MALE HEAD OF THE CHURCH NOW THAT
28 HE IS MARRIED TO ELIZABETH?

1 A NOT THAT I'VE EVER -- I'VE NEVER CALLED HIM
2 FATHER.

3 Q YOU JUST CALL HIM EDWARD OR ED FRANCIS?

4 A YES.

5 Q IS HE AN ARCHBISHOP OR BISHOP OR ANY OF THOSE
6 THINGS IN THE CHURCH?

7 A HE HAS A HIGH -- POSITIONS OF HIERARCHY IN THE
8 CHURCH, BUT I REALLY DON'T KNOW AT THE MOMENT WHAT THEY ARE.

9 Q I AM GOING TO ASK YOU A QUESTION THAT USUALLY
10 OFFENDS LADIES AND I AM GOING TO APOLOGIZE FOR IT FIRST.

11 WOULD YOU TELL US HOW OLD YOU ARE?

12 A I AM 35.

13 Q SO BACK IN 1974, WHICH IS 12 YEARS AGO, YOU
14 WERE JUST IN YOUR EARLY TWENTIES?

15 A THAT'S RIGHT.

16 Q WHEN YOU WENT TO SUMMIT UNIVERSITY?

17 A RIGHT.

18 Q AT THAT TIME, DID YOU OWN ANY REAL PROPERTY?

19 A JEWELRY AND MONEY.

20 Q NO. REAL PROPERTY IS REAL ESTATE.

21 A NO, I DIDN'T OWN ANY REAL ESTATE.

22 THE COURT: LAND OR BUILDINGS.

23 THE WITNESS: OKAY. I DIDN'T OWN ANY LAND OR
24 BUILDINGS.

25 Q BY MR. LEVY: DID YOU HAVE ANY COLLEGE DEGREES
26 OR PROFESSIONAL DEGREES?

27 A YES.

28 Q AND WHAT WERE THEY?

1 A I HAVE A BACHELOR OF SCIENCE FROM SYRACUSE
2 UNIVERSITY, AND A CERTIFICATE FOR TEACHING ENGLISH AND
3 SPEECH AT THE GRADES OF KINDERGARTEN THROUGH 12TH AND
4 ADULTS.

5 Q WHEN YOU FIRST STARTED WITH THE CHURCH, DID YOU
6 START TEACHING IN THEIR MONTESSORI SCHOOL?

7 A THERE WAS NO MONTESSORI SCHOOL TO TEACH IN AT
8 THE TIME.

9 Q SO YOU TAUGHT AT --

10 A SUMMIT UNIVERSITY.

11 Q YOU BECAME A TEACHING ASSISTANT AT SUMMIT
12 UNIVERSITY?

13 A YES.

14 Q WHAT KIND OF TRAINING PROGRAM DID YOU HAVE
15 BEFORE YOU STARTED AS A TEACHING ASSISTANT?

16 A WELL, THE OTHER TEACHING ASSISTANTS WORKED WITH
17 ME FOR A NUMBER OF MONTHS AND EXPLAINED WHAT THE DUTIES
18 WERE, SHOWED ME HOW TO DO THINGS. IT WAS LIKE AN APPRENTICE
19 TYPE OF A THING.

20 Q NO FORMAL TEACHING, JUST DO WHAT I DO KIND OF
21 THING?

22 A THERE WAS A MANUAL FOR WHAT WAS DONE AND, YOU
23 KNOW, I READ BASICALLY. BUT IT --

24 Q WHAT WAS THE NAME OF THE MANUAL?

25 A IT WAS AN ORIENTATION MANUAL.

26 Q SPECIAL FOR SUMMIT UNIVERSITY TEACHERS?

27 A THERE WAS A JOB DESCRIPTION IN THERE,
28 DESCRIPTIONS OF WHAT DIFFERENT JOBS WERE THROUGHOUT THE

1 ORGANIZATION.

2 Q DID IT ALSO TELL YOU WHAT IT WAS YOU WERE GOING
3 TO TEACH THE STUDENTS AT SUMMIT?

4 A BASICALLY THE TEACHINGS OF THE ASCENDED
5 MASTERS.

6 Q YOU EVER HEARD A THING CALLED THE CLOCK OF
7 BETRAYAL?

8 A YES.

9 Q WOULD YOU TELL US WHAT THAT IS?

10 A I THINK IT IS A GROUP OF PEOPLE WHO HAVE LEFT
11 THE CHURCH, AND WHO HAVE TURNED ON THE CHURCH, AND FOCUSED A
12 GREAT DEAL OF HATRED, A GREAT DEAL OF CRITICISM AND
13 CONDEMNATION. THAT IS WHAT, YOU KNOW, BETRAYAL, THEY
14 BETRAYED IN THE SENSE THAT THEY ARE CONDEMNING.

15 Q AND WHAT HAPPENS TO THESE PEOPLE WITH THE
16 CLOCK? ARE THEIR PICTURES PUT UP ON A CLOCK OR SOMETHING?

17 A NO.

18 Q WELL, HOW DO THEY GET CONNECTED WITH THIS CLOCK
19 OF BETRAYAL? WOULD YOU TELL US THAT?

20 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO A LACK
21 OF FOUNDATION AT THIS POINT.

22 THE COURT: OVERRULED.

23 Q BY MR. LEVY: DO YOU WANT TO GO AHEAD?

24 A COULD YOU REPEAT THE QUESTION, PLEASE?

25 Q YES. I AM TRYING TO FIGURE OUT -- USUALLY I AM
26 LOOKING UP AT THIS CLOCK AND I SEE 12 SPACES. ARE THERE
27 LIKE 12 ENEMIES OF THE CHURCH AND YOU -- IS THAT WHAT THE
28 CLOCK OF BETRAYAL IS OR DO YOU HAVE ANOTHER ANSWER FOR IT?

1 A I WOULD SAY THAT PEOPLE WHO HAVE LEFT ARE -- I
2 DON'T -- I DON'T KNOW HOW YOU WOULD WANT IT RELATED TO THE
3 CLOCK, BUT THEY ARE JUST TIME WAYS BETRAYING. I DON'T --

4 Q WELL, SINCE I HAVE NEVER BEEN THERE AND I DON'T
5 KNOW WHAT THE CLOCK OF BETRAYAL IS, HOW DO YOU RELATE IT?
6 HOW DO PEOPLE IN THE CHURCH RELATE IT TO THE CLOCK OF
7 BETRAYAL?

8 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
9 AMBIGUOUS, YOUR HONOR.

10 THE COURT: PLEASE REPHRASE YOUR QUESTION.

11 Q BY MR. LEVY: IS THERE SOMETHING TAUGHT IN YOUR
12 CHURCH ABOUT A CLOCK OF BETRAYAL?

13 A YES.

14 Q WOULD YOU TELL US WHAT IS TAUGHT ABOUT THE
15 CLOCK OF BETRAYAL?

16 A THE CLOCK OF BETRAYAL IS A GROUP OF PEOPLE WHO
17 HAVE LEFT THE CHURCH WHO ARE FOCUSING CONDEMNATION,
18 CRITICISM, TREMENDOUS AMOUNT OF HATRED, GOSSIP, WHATEVER
19 ELSE YOU CAN SAY, AGAINST THE CHURCH AND ITS MEMBERS, OUR
20 ACTIVITIES, OUR -- WHATEVER WE ARE DOING.

21 Q AND WHAT DO YOU DO AS A MEMBER WITH REGARD TO
22 THE CLOCK OF BETRAYAL?

23 A RIGHT NOW I DON'T DO ANYTHING ABOUT IT.

24 Q WELL, WHAT DID YOU USE TO DO BEFORE?

25 A WELL, NOT ONLY FOR THE CLOCK OF BETRAYAL, BUT I
26 THINK FOR ANYONE WHO IS FOCUSING NEGATIVE ENERGY OR
27 NEGATIVITY, I WOULD MAKE CALLS OR DECREES ON THE ENERGY, BUT
28 NEVER ON AN INDIVIDUAL.

1 Q ARE YOU TAUGHT AT THE CHURCH THAT PEOPLE ARE
2 THEIR ENERGY AND ARE THEIR LIGHT AND ARE THEIR SUBSTANCES,
3 ARE THAT PART OF YOUR TEACHINGS?

4 A NO.

5 Q ALL YOU ARE CONCERNED WITH IS THE ENERGY THAT
6 THEY ARE AND YOU DECREE AGAINST THE ENERGY, BUT NOT AGAINST
7 THE PEOPLE?

8 A THAT IS TRUE. YOU NEVER EVER DECREE AGAINST A
9 PERSON.

10 Q WHAT IS THE THING CALLED REVERSING THE TIDES?

11 A REVERSING THE TIDE WOULD BE IF SOMEONE FOCUSED
12 A GREAT DEAL OF HATRED — I THINK THAT EVERYBODY HAS
13 PROBABLY EXPERIENCED A FEELING OF LIKE A, YOU KNOW, THEIR
14 STOMACH IS FILLED WITH JUST A KIND OF A PIT OF EMOTIONAL
15 ENERGY THAT YOU CAN FEEL SOMEONE ELSE THROW AT YOU OR FEEL
16 FOR YOU. YOU CAN FEEL THAT. AND WHEN YOU REVERSE THE TIDE
17 OF ANY ENERGY, YOU REVERSE THAT ENERGY. YOU SEND IT BACK TO
18 ITS SOURCE.

19 Q AND IF THAT SOURCE COMES FROM SOMEBODY WHO IS
20 IN DISAGREEMENT WITH THE CHURCH AND YOU ARE SENDING ALL THIS
21 ENERGY BACK TO THAT OTHER PERSON'S PIT OF THEIR STOMACH, IS
22 THERE ANY CHANCE THAT THIS IS GOING TO HAVE ANY ADVERSE
23 EFFECT ON THEM OR THEIR ENERGY?

24 A EXCUSE ME, BUT THAT IS NOT WHAT I SAID.

25 MR. KLEIN: I AM GO —

26 Q BY MR. LEVY: WHY DON'T YOU EXPLAIN IT TO ME.

27 MR. KLEIN: I AM GOING TO OBJECT AS TO SPECULATION AT
28 THIS POINT, YOUR HONOR. AND ALSO AS TO THE RELEVANCY.

1 THE COURT: OVERRULED.

2 THE WITNESS: WELL, I HAVE ALREADY SAID THAT YOU
3 NEVER SEND ANY ENERGY BACK TO A PERSON. YOU DON'T
4 PERSONALIZE ANY ENERGY.

5 Q BY MR. LEVY: YOU CONFUSED ME. YOU TOLD ME
6 SOMETHING ABOUT SOMETHING IS IN THE PIT OF SOMEBODY'S
7 STOMACH OR MAYBE YOUR STOMACH BECAUSE OF A FEELING AND THEN
8 YOU DIRECT THE ENERGY BACK TO WHERE IT CAME. IF IT WAS IN
9 THE PIT OF MY STOMACH, I WOULD TAKE THAT PERSONALLY. I
10 THINK IT IS PART OF ME.

11 A I DON'T EVER DIRECT ANY ENERGY WHEN I DECREE
12 TOWARDS AN INDIVIDUAL OR A PERSON. THAT IS ALL I CAN SAY.

13 Q OKAY. THANK YOU.

14 ARE YOU FAMILIAR WITH SOME OF THE BOOKS OR ANY
15 OF THE BOOKS THAT MISS PROPHET HAS IN HER LIBRARY?

16 A I DON'T KNOW WHAT YOU MEAN BY THAT.

17 Q YOU DON'T KNOW WHAT BOOKS ARE?

18 A I KNOW WHAT BOOKS ARE, BUT I DON'T KNOW WHAT
19 YOU MEAN BY HER PARTICULAR LIBRARY.

20 Q DOES MISS PROPHET HAVE A LIBRARY?

21 A I SUPPOSE. I DON'T REALLY KNOW.

22 Q HAVE YOU EVER SEEN ANY BOOKS OF HERS THAT WERE
23 KIND OF WRAPPED WITH ALUMINUM FOIL OR TIN FOIL?

24 A NO.

25 Q HAVE YOU EVER SEEN ANY BOOKS OF HERS THAT HAD A
26 TITLE ON THE COVER OF BLACK MAGIC?

27 A NO.

28 Q WHAT ABOUT THE OCCULT?

1 A NO.

2 Q WHAT ABOUT HYPNOTISM?

3 A NO.

4 Q SHE NEVER SHARED THOSE WITH YOU?

5 A WE WERE ALWAYS TAUGHT THAT HYPNOTISM WAS
6 SOMETHING THAT YOU WOULD NOT WANT TO PARTICIPATE IN NOR BE A
7 PART OF, NOR WAS THE OCCULT.

8 Q LET ME ASK YOU SOMETHING. AS A NURSE, HAVE YOU
9 EVER HEARD OF HYPNOTISM USED IN THE BURN WARDS OR SAY THE
10 LAMAZE METHOD? HAVE YOU EVER HEARD OF THAT?

11 A I HAVE NEVER KNOWN ANYONE IN THE NURSING
12 PROFESSION TO REFER TO ANYTHING THAT IS DONE IN LAMAZE OR
13 ANY OTHER AS HYPNOTISM. IT IS BREATHING EXERCISES, BUT I
14 DON'T KNOW IF IT HAS EVER BEEN REFERRED TO ME BY ANY OF MY
15 INSTRUCTORS AS HYPNOTISM. IT IS BREATHING EXERCISES.

16 Q AND IT IS SUPPOSED TO RELIEVE THE PAIN AND THE
17 DISCOMFORT IF YOU FOCUS YOUR MIND AND YOUR SUGGESTIBILITY ON
18 BREATHING AS OPPOSED TO ON THE PAIN?

19 A WELL, IF YOU WANT TO -- IF YOU WANT ME TO GIVE
20 IT TO YOU IN A TECHNICAL WAY, IF YOU BREATHE IN A PARTICULAR
21 WAY, YOU ARE ALLOWING MORE OXYGEN TO GO INTO YOUR BODY,
22 WHICH IS GOING TO RELIEVE YOUR MUSCLES FROM CONTRACTING AND
23 THE PAIN WILL NOT BE AS GREAT.

24 Q DOES THAT HAVE SOMETHING TO DO WITH YOUR
25 SUGGESTIBILITY?

26 A I DON'T KNOW WHAT YOU MEAN BY "SUGGESTIBILITY."
27 WHEN YOU ASK ME A QUESTION ABOUT THE LAMAZE METHOD, I AM
28 TELLING YOU THAT I THINK AND INTERPRET IT AS BEING A

1 BREATHING EXERCISE.

2 Q NOW, YOU TOLD US THAT WHEN YOU WERE AT SUMMIT
3 UNIVERSITY, WHAT YOU HAD WAS A VERY BALANCED DIET; IS THAT
4 CORRECT?

5 A YES.

6 Q THEN YOU TOLD US THAT SOMETIME LATER, THEY
7 ADDED MEAT TO THAT DIET; IS THAT CORRECT?

8 A THAT IS TRUE.

9 Q DID THAT UNBALANCE IT IN ANY WAY?

10 A NO.

11 Q SO WHATEVER THEY ADDED TO IT WOULD HAVE JUST
12 BEEN ALL THAT BETTER?

13 A YES.

14 Q AND IF THEY TOOK SOMETHING FROM IT, WOULD THAT
15 HAVE STILL KEPT IT BALANCED?

16 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
17 AMBIGUOUS, YOUR HONOR.

18 THE COURT: OVERRULED.

19 THE WITNESS: PARDON ME?

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

21 A WOULD YOU REPEAT IT, PLEASE?

22 Q WELL, WE ARE TALKING ABOUT WHAT CONSTITUTES A
23 BALANCED DIET. THE MEAT DIDN'T UNBALANCE IT.

24 MY QUESTION WAS TO YOU IF WE DETRACTED OR TOOK
25 SOMETHING FROM THE DIET, WOULD THAT HAVE UNBALANCED IT?

26 A WELL, I KNOW WHAT A BALANCED DIET IS AND I KNOW
27 WHAT A BALANCED DIET IS FOR VEGETARIANS BECAUSE AS A NURSE I
28 HAVE BEEN TAUGHT WHAT A BALANCED DIET IS TO SUGGEST TO A

1 VEGETARIAN AS WELL AS THOSE WHO EAT MEAT. SO IF YOU PARTAKE
2 OF A VEGETARIAN DIET, IT IS IMPORTANT THAT THAT DIET BE
3 BALANCED. IF YOU PARTAKE OF MEAT, THEN, YOU KNOW, THAT IS
4 THAT FORM OF PROTEIN.

5 WHAT I AM SAYING IS WHEN I ATTENDED SUMMIT
6 UNIVERSITY AND FOR THE FIRST SEVERAL YEARS THAT I WAS ON THE
7 STAFF, I ATE A BALANCED VEGETARIAN DIET. WHEN MEAT WAS
8 ADDED TO IT, I ATE MEAT AND I ATE WHATEVER ELSE I FELT LIKE
9 EATING WITH IT TO MAKE IT A BALANCED DIET.

10 IT WAS LIKE OPTIONS. IT IS LIKE WHEN YOU GO TO
11 A CAFETERIA, YOU CAN CHOOSE TO EAT MEAT ONE DAY AND SALAD
12 AND BEANS AND WHATEVER. IT IS KNOWING WHAT PROTEIN IS AND
13 THE FOUR BASIC FOOD GROUPS AND USING IT THAT WAY.

14 Q GOLLY, THAT SOUNDS SWELL.

15 LET ME ASK YOU THIS: IF I, WHO EAT ALL
16 DIFFERENT KINDS OF FOOD, WENT TO SUMMIT UNIVERSITY AND WAS
17 USED TO A HIGH PROTEIN DIET AND ALL OF A SUDDEN I SWITCHED
18 TO A VEGETARIAN DIET, WOULD THERE HAVE BEEN ANY TENDENCY
19 WHATEVER FOR THAT TO MAYBE ADVERSELY AFFECT ME AND MINIMIZE
20 THE BENEFIT I WOULD HAVE GOTTEN FROM MY REGULAR PROTEIN
21 DIET?

22 MR. KLEIN: I AM GOING TO OBJECT AS TO LACK OF
23 FOUNDATION AND RELEVANCE, YOUR HONOR.

24 THE COURT: OVERRULED.

25 THE WITNESS: I THINK THAT IF YOU KNEW HOW TO BALANCE
26 YOUR DIET —

27 Q BY MR. LEVY: THAT IS NOT MY QUESTION, MA'AM.
28 DO YOU WANT TO RESPOND TO MY QUESTION?

1 A OKAY. WOULD YOU REPEAT YOUR QUESTION AGAIN
2 THEN?

3 Q YES. I WANT TO FIND OUT IF SOMEBODY WHO IS
4 USED TO A HIGH PROTEIN DIET, MEAT AND MILK AND EGGS AND ALL
5 THE THINGS THAT ARE KNOWN AS HIGH PROTEIN FOODS, IF THEY ARE
6 NOT A VEGETARIAN WHEN THEY GO TO SUMMIT UNIVERSITY, IF
7 ABRUPTLY THEY CHANGE FROM THEIR REGULAR DIET TO A VEGETARIAN
8 DIET, IS IT POSSIBLE THAT THAT MIGHT HAVE SOME KIND OF
9 EFFECT ON THEM, SUCH AS MAKING THEM A LITTLE BIT MORE TIRED
10 OR NOT AS CAPABLE OF PERFORMING TASKS AS THEY WOULD HAVE
11 BEEN ON THEIR NORMAL DIET?

12 A I THINK THAT IS INDIVIDUAL AND I THINK IT
13 DEPENDS ON WHAT THEY EAT.

14 Q AND I THINK YOU ARE DOING EVERYTHING EXCEPT
15 ANSWERING THE QUESTION. MAYBE WE COULD GET TO THE QUESTION,
16 PLEASE.

17 MR. KLEIN: I WOULD OBJECT. I WOULD SUGGEST SHE
18 ANSWERED THE QUESTION, YOUR HONOR.

19 THE COURT: OVERRULED.

20 Q BY MR. LEVY: DO YOU WANT TO ANSWER MY
21 QUESTION, PLEASE?

22 A I AM TRYING.

23 Q I DON'T MEAN TO BE RUDE TO YOU. I REALLY
24 DON'T. I THINK IT IS A VERY STRAIGHTFORWARD QUESTION.

25 A I DON'T THINK THAT IN THREE MONTHS OR THE
26 COURSE OF 12 WEEKS THAT A PERSON -- A GENERAL PERSON IN GOOD
27 HEALTH WOULD SUFFER FROM EATING A VEGETARIAN -- A BALANCED
28 VEGETARIAN DIET.

1 Q WHAT ABOUT SOMEBODY 55 --

2 THE COURT: THE QUESTION IS NOT SUFFERING. DO YOU
3 WANT TO HEAR THE QUESTION AGAIN?

4 THE WITNESS: YES.

5 THE COURT: PLEASE.

6 (THE QUESTION WAS READ.)

7 THE WITNESS: I THINK THAT IS A POSSIBILITY.

8 Q BY MR. LEVY: BIG POSSIBILITY?

9 A POSSIBILITY.

10 Q OKAY. DID YOU FAST WHEN YOU WENT TO SUMMIT
11 UNIVERSITY?

12 A SOMETIMES.

13 Q AT THE END OF THE THREE-DAY FAST, WHAT IS THE
14 NORMAL PROCEDURE AT SUMMIT UNIVERSITY?

15 A I THINK THAT YOU ARE ENCOURAGED TO BREAK IT
16 SLOWLY, ON CABBAGE OR CARROTS OR SOME KIND OF A RAW
17 VEGETABLE. BUT BASICALLY IF, YOU KNOW, YOU ARE TAUGHT THAT
18 IT IS -- A FAST IS -- WELL, YOU JUST NEED TO COME OFF OF IT
19 SLOWLY AND NOT GORGE YOURSELF WITH BREAD AND HEAVY THINGS
20 BECAUSE THAT WOULD -- IT WOULD BURDEN YOUR STOMACH. YOU
21 HAVE TO BREAK YOURSELF IN EASILY.

22 Q DID YOU EVER -- PARDON ME.

23 WERE YOU EVER ADVISED TO TAKE FOUR OUNCES OF
24 OLIVE OIL AFTER YOUR THREE-DAY FAST?

25 A DURING ONE FAST THAT I DID I WAS.

26 Q DID YOU EVER TAKE ENEMAS AND COLONICS AFTER
27 YOUR FASTING?

28 A YES.

1 Q YOU DESCRIBED YOUR EXPERIENCE AT SUMMIT
2 UNIVERSITY JUST A GRAND OLD GLORIOUS TIME. WERE THE ENEMAS
3 AND COLONICS PART OF THE GRAND OLD GLORIOUS TIME?

4 A YES, THEY WERE. THEY WERE PART OF HEALING.

5 Q I NOTICE WHEN YOU ARE REFERRING TO ELIZABETH,
6 YOU TOLD US HOW MUCH YOU LOVE HER. LET'S SAY SOMEONE WAS
7 THREATENING ELIZABETH AND HER CHURCH UNIVERSAL AND
8 TRIUMPHANT. WOULD YOU DEFEND HER?

9 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
10 AMBIGUOUS, YOUR HONOR.

11 MR. LEVY: I THINK SHE KNOWS WHAT IT MEANS.

12 THE COURT: OVERRULED.

13 YOU CAN ANSWER.

14 THE WITNESS: WELL, MAY I ASK HOW YOU MEAN "DEFEND"?

15 Q BY MR. LEVY: WOULD YOU STAND OUT THERE, AND
16 GET BETWEEN HER AND THE DANGER FROM THE FALLEN ONES AND THE
17 DARK ONES OUT THERE?

18 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
19 AMBIGUOUS AS TO THE THREATENED ALSO, YOUR HONOR.

20 THE COURT: SHE CAN ANSWER.

21 THE WITNESS: I REALLY -- I WOULD LIKE YOU TO DEFINE
22 MORE WHAT YOU MEAN BY "GET OUT THERE AND DEFEND." I MEAN I
23 CAN INTERPRET IT BUT --

24 Q BY MR. LEVY: WOULD YOU PICK UP A STICK AND
25 STAND BETWEEN ELIZABETH AND SOMEONE THREATENING ELIZABETH?

26 A I THINK IF SOMEONE WAS THREATENING HER LIFE OR
27 ANY OF A FRIEND'S LIFE, I WOULD TRY TO DEFEND THEM.

28 Q LET'S SAY TODAY WAS THE ARMAGEDDON RIGHT NOW

1 AND SOMEBODY WAS GOING RIGHT FOR ELIZABETH.

2 WOULD YOU GET BETWEEN ELIZABETH AND THAT PERSON
3 WHO IS COMING AFTER HER?

4 A YES, I WOULD.

5 Q WOULD YOU LIE A LITTLE BIT FOR ELIZABETH?

6 A NO, I WOULD NEVER NEED TO LIE.

7 MR. LEVY: THANK YOU.

8 I HAVE NOTHING FURTHER.

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

10

11 REDIRECT EXAMINATION +

12 BY MR. KLEIN:

13 Q WHEN YOU TALKED ABOUT REVERSING THE TIDES AND
14 DIRECTING ENERGY BACK TO A PERSON, IS THAT SOMETHING THAT
15 YOU DO IN YOUR HOUSE OR IN THE CHAPEL, OR IS THAT SOMETHING
16 YOU PHYSICALLY GO OUT AND DO SOME KIND OF ACTION?

17 A NO. IT IS JUST A SPIRITUAL FORM OF PRAYER.

18 Q DOES REVERSING THE TIDES EVER MEAN ANYTHING
19 MORE THAN JUST A TYPE OF PRAYER?

20 A NO.

21 Q NOW, YOU KNEW MR. MULL AT SUMMIT UNIVERSITY IN
22 JANUARY THROUGH MARCH OF 1975?

23 A YES.

24 Q DID YOU SEE HIM AT THE END OF THE QUARTER?

25 A OF SUMMIT UNIVERSITY?

26 Q YES.

27 A YES.

28 Q AND YOU ALSO KNEW HIM AT CAMELOT?

1 A YES.

2 Q DID YOU EVER SEE HIM DO OR SAY OR APPEAR IN ANY
3 WAY THAT LED YOU TO CONCLUDE THAT HE WAS ADVERSELY AFFECTED
4 BY THE TYPE OF DIET HE WAS GETTING?

5 A NO. HE SEEMED TO ME VERY HAPPY.

6 Q AT THE END OF THE SUMMIT UNIVERSITY QUARTER IN
7 MARCH OF 1975, DID MR. MULL APPEAR TO BE SICK IN ANY WAY?

8 A NO.

9 Q YOU SAID THAT YOU HAD COLONICS AT SUMMIT
10 UNIVERSITY?

11 A YES.

12 Q HOW OFTEN?

13 A I THINK I HAD ONE.

14 Q DURING THE WHOLE THREE MONTHS?

15 A UH-HUH.

16 Q DID ANYBODY TELL YOU THAT YOU HAD TO HAVE A
17 COLONIC?

18 A NO. IT WAS MY CHOICE. BUT CAN I SAY ONE OTHER
19 THING TO THAT?

20 Q SURE.

21 A AS A NURSE, I GIVE ENEMAS TO THE PATIENT -- TO
22 PATIENTS TO -- IN PREPARATION FOR SURGERY OR JUST BECAUSE A
23 DOCTOR MIGHT ORDER IT. IT IS A -- IT IS NOT AN UNUSUAL
24 THING.

25 MR. KLEIN: THANK YOU.

26 I HAVE NO FURTHER QUESTIONS.

27 ///

28 ///

1 RE-CROSS-EXAMINATION +

2 BY MR. LEVY:

3 Q JUST THE ONE MORE QUESTION, MA'AM.

4 I DON'T KNOW WHETHER MR. KLEIN MADE A MISTAKE
5 OR NOT, BUT HE ASKED YOU ABOUT REVERSING THE TIDES. AND I
6 DON'T RECALL WHETHER IT WAS HIM WHO SAID IT OR YOU WHO SAID
7 IT, BUT YOU DESCRIBED IT AS DIRECTING ENERGY BACK TO A
8 PERSON?

9 A YOU SAID THAT.

10 Q WAS IT HIM OR WAS IT YOU WHO SAID THAT?

11 A IT WAS YOU.

12 MR. MIDDLETON: IT WAS MR. KLEIN.

13 Q BY MR. LEVY: MR. KLEIN JUST ASKED YOU IF
14 REVERSING THE TIDES MEANT DIRECTING ENERGIES BACK TO A
15 PERSON. ALL I WANT IS FOR YOU TO CLARIFY IT.16 A EXCUSE ME, BUT I DON'T REMEMBER SAYING THAT.
17 MAYBE I DID BUT —

18 Q IT WAS IN ERROR THEN?

19 A YES.

20 Q AND IF MR. KLEIN SAID THAT, IT WAS IN ERROR
21 ALSO?22 A HE ASKED ME — IF HE ASKED ME IF I DIRECTED
23 ENERGY BACK AT A PERSON, THEN I ANSWERED HIM INCORRECTLY AND
24 IT WAS MY FAULT. I DIDN'T LISTEN TO THE QUESTION.

25 Q THEN ONE MORE QUESTION FOR YOU.

26 WHEN YOU WORKED AT THE CHURCH, WERE YOU GETTING
27 PAID FOR YOUR WORK AT THE CHURCH?

28 A A MINIMAL AMOUNT, YES, AT THE TIME.

1 Q AND YOU WORKED OFF OF CAMPUS, DID YOU, AND THAT
2 IS HOW YOU MADE YOUR INCOME?

3 A NO. I MADE INCOME -- WHEN I WORKED OUT YOU
4 MEAN?

5 Q YES.

6 A WELL, I MADE AN INCOME FROM TEACHING AND ALSO I
7 GOT A STIPEND FROM THE CHURCH.

8 Q WOULD YOU TELL US WHAT YOU GOT FROM THE CHURCH
9 AND FOR HOW MANY HOURS WORK THAT WAS?

10 A WELL, BESIDES THE STIPEND I GOT ROOM, BOARD AND
11 I RECEIVED AT THE TIME APPROXIMATELY 35 TO \$50.

12 Q IS THAT PER MONTH?

13 A YES.

14 Q AND FOR HOW MANY HOURS WOULD YOU EXPEND FOR THE
15 CHURCH FOR THE \$35?

16 A A NORMAL WORKING WEEK I THINK.

17 Q YOU WERE WORKING 40 HOURS A WEEK, DEVOTING THAT
18 MUCH TIME TO THE CHURCH, AND YOU GOT \$35 A MONTH PLUS YOUR
19 ROOM AND BOARD?

20 A PLUS OTHER THINGS, YEAH. MEDICAL AND DENTAL,
21 THINGS LIKE THAT.

22 Q DID YOU EVER KNOW DR. RALPH YANEY?

23 A I -- YES, I DO KNOW HIM.

24 Q DID YOU EVER WORK WITH HIM WITH ANY OF THE
25 PEOPLE AT SUMMIT UNIVERSITY?

26 A NO.

27 Q BY THE WAY, DO YOU HAVE A DEGREE IN NUTRITION?

28 A I DON'T HAVE A DEGREE IN NUTRITION.

1 Q AND SO ALL THE INFORMATION YOU GAVE US ABOUT
2 THE SWELL STUFF THERE IS REALLY YOUR OPINION AS REGARDS
3 NUTRITION?

4 A IT IS WHAT I'VE LEARNED IN SCHOOL. I'VE TAKEN
5 COURSES IN IT. SO, YOU KNOW, AS A NURSE I WOULD BE ABLE TO
6 HOPEFULLY SAY WHAT IS A BALANCED DIET. I DON'T --

7 Q AS A NURSE, YOU ARE NOT ABLE TO PRACTICE
8 NUTRITION AS A NUTRITIONIST?

9 A NOT AS A NUTRITIONIST, BUT AS A NURSE. HOW ANY
10 NURSE WOULD PRACTICE NUTRITION.

11 Q AS A NURSE, YOU ARE NOT ALLOWED TO DO SURGERY?

12 A NO.

13 Q SO AS A NURSE, YOU CAN'T DO HEART SURGERY OR
14 ANYTHING ELSE IN THE LINE OF SURGERY?

15 MR. KLEIN: I AM GOING TO OBJECT AS ARGUMENTATIVE,
16 YOUR HONOR.

17 THE COURT: WHAT?

18 MR. KLEIN: I AM GOING TO OBJECT AS ARGUMENTATIVE
19 WHETHER SHE CAN DO HEART SURGERY.

20 THE COURT: OVERRULED.

21 THE WITNESS: AS A NURSE, I CANNOT DO HEART SURGERY.

22 Q BY MR. LEVY: AS A NURSE, DO YOU HAVE ANY
23 CREDENTIAL THAT QUALIFIES YOU AS A SPECIALIST IN NUTRITION?

24 A I HAVE NO CREDENTIAL THAT QUALIFIES ME AS A
25 SPECIALIST IN NUTRITION.

26 Q DOES IT QUALIFY YOU IN ANY OTHER WAY? DO YOU
27 HAVE A CREDENTIAL THAT QUALIFIES YOU TO DO ANYTHING WITH
28 REGARDS TO NUTRITION?

1 A IT -- AS A NURSE, I AM QUALIFIED TO GIVE ADVICE
2 TO PATIENTS ON WHAT IS A BALANCED DIET.

3 Q HOW MANY HOURS DID YOU SPEND IN NUTRITION WHEN
4 YOU WENT TO SCHOOL TO BE A NURSE?

5 A I TOOK A THREE-UNIT CLASS IN NUTRITION, WHICH
6 WAS A REGULAR SEMESTER. SO I DON'T -- WHATEVER A SEMESTER
7 OF IT, ONE BASIC COURSE WAS. AND ALSO I HAVE HAD NUTRITION
8 THROUGHOUT THE FOUR YEARS OF COLLEGE THAT I HAVE HAD
9 NURSING.

10 AND IT'S BEEN INTERSPERSED WITH ALL THE CLASSES
11 I HAVE HAD, MEDICAL SURGERY NURSING, PSYCHIATRIC NURSING,
12 MATERNITY NURSING AND PEDIATRIC NURSING.

13 Q MAYBE I MISUNDERSTOOD YOU. I THOUGHT YOU WERE
14 STILL GOING TO SCHOOL TO GET SOME KIND OF CREDENTIAL WITH
15 REGARD TO NURSING?

16 A THAT'S CORRECT. IN TWO MONTHS I WILL GRADUATE
17 WITH MY B.S.N. IN NURSING.

18 Q YOU ARE STILL JUST A STUDENT AND YOU HAVE NO
19 CREDENTIAL THAT HAS ANYTHING TO DO WITH REGARD TO NUTRITION;
20 IS THAT TRUE?

21 A AT THIS POINT YES, THAT IS TRUE.

22 MR. LEVY: THANK YOU.

23 I HAVE NOTHING FURTHER.

24

25 FURTHER REDIRECT EXAMINATION +

26 BY MR. KLEIN:

27 Q LET'S JUST CLEAR IT UP. DO YOU EVER DECREE
28 AGAINST PEOPLE?

1 A NO, I NEVER DECREE AGAINST PEOPLE.

2 Q NOW, YOU SAID YOU WORKED FOR \$35 A MONTH PLUS
3 ROOM AND BOARD AND MEDICAL BENEFITS?

4 A THAT IS TRUE.

5 Q WHY DID YOU WORK FULL-TIME FOR THE CHURCH FOR
6 SUCH A SEEMINGLY SMALL AMOUNT OF MONEY?

7 A I DID IT OF MY OWN FREE WILL BECAUSE I WAS A
8 PART AND AM A PART OF A RELIGIOUS COMMUNITY. AND I WOULD
9 NOT SEEK MONETARY BENEFITS OR ANYTHING FOR MY SERVICE
10 BECAUSE I AM SERVING GOD.

11 MR. KLEIN: THANK YOU.

12 NO FURTHER QUESTIONS.

13 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

14 THE COURT: YOU ARE EXCUSED.

15 THE WITNESS: THANK YOU.

16 THE COURT: CALL YOUR NEXT WITNESS.

17 MR. KLEIN: MR. RICHARD STEIN, YOUR HONOR.

18 YOUR HONOR, MAY THE WITNESS WHO JUST TESTIFIED
19 SIT IN THE AUDIENCE AT THIS POINT?

20 THE COURT: BEG YOUR PARDON?

21 MR. KLEIN: I SAID MAY THE WITNESS WHO JUST TESTIFIED
22 SIT IN THE AUDIENCE AT THIS POINT? WE HAVE DONE THAT WITH
23 SOME OTHER WITNESSES.

24 THE COURT: YOU ARE NOT PLANNING TO CALL HER AGAIN?

25 MR. KLEIN: NOT TO MY KNOWLEDGE, YOUR HONOR.

26 THE COURT: WITH THAT UNDERSTANDING THAT SHE WON'T BE
27 CALLED AGAIN --

28 MR. KLEIN: YOUR HONOR, WE HAVE HAD SOME WITNESSES IN

1 THE PAST THAT WE HAVE ALLOWED TO SIT HERE WHO MAY OR MAY NOT
2 BE CALLED AGAIN. WE SAID THAT THEY COULDN'T SIT HERE WHEN
3 THE OTHER PARTY'S CASE WAS BEING PRESENTED.

4 THE COURT: MR. KLEIN, I REMEMBER OUR DISCUSSIONS
5 LAST WEEK.

6 MR. KLEIN: YES, YOUR HONOR.

7 THE COURT: SHE CAN STAY.

8 MR. KLEIN: THANK YOU, YOUR HONOR.

9 THE COURT: BASED UPON YOUR REPRESENTATION.

10 MR. KLEIN: I AM SORRY, I DIDN'T HEAR YOU, YOUR
11 HONOR.

12 THE COURT: LET'S PROCEED.

13

14

RICHARD STEIN, +

15

A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,

16

TESTIFIES AS FOLLOWS:

17

THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.

18

PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR
19 FIRST AND LAST NAME.

20

A PLAINTIFF'S/DEFENDANT'S WITNESS, HAVING BEEN FIRST
21 DULY SWORN, TESTIFIES AS FOLLOWS:

22

THE WITNESS: IT IS RICHARD STEIN. R-I-C-H-A-R-D;

23

STEIN, S-T-E-I-N.

24

THE CLERK: THANK YOU.

25

26

DIRECT EXAMINATION +

27

BY MR. KLEIN:

28

Q MR. STEIN, WHAT IS YOUR EDUCATIONAL BACKGROUND?

1 A BASICALLY JUST HIGH SCHOOL GRADUATE.

2 Q ARE YOU CURRENTLY EMPLOYED?

3 A YES, I AM.

4 Q WHAT DO YOU DO?

5 A CURRENTLY I AM IN CAR SALES. I WORK FOR A
6 DEALERSHIP CALLED MAGIC FORD IN VALENCIA.

7 Q WAS THERE A TIME WHEN YOU WERE AFFILIATED WITH
8 CHURCH UNIVERSAL AND TRIUMPHANT?

9 A YES, THERE WAS.

10 Q WHEN DID YOU FIRST BECOME AFFILIATED WITH THIS
11 CHURCH?

12 A I BELIEVE IT WAS RIGHT AROUND THE END OF 1976
13 AND BEGINNING OF 1977.

14 Q AND WHAT WAS THE NATURE OF YOUR EARLY
15 AFFILIATION?

16 A JUST BASICALLY READING THE DIFFERENT BOOKS AND
17 LITERATURE THAT WAS AVAILABLE, PARTAKING SOME OF THE
18 CONFERENCES.

19 Q DID THERE COME A TIME WHEN YOU BECAME A STAFF
20 MEMBER?

21 A YES.

22 Q WHEN WAS THAT?

23 A LET'S SEE. IT WAS RIGHT AROUND FEBRUARY, 1977.
24 ACTUALLY IT WAS A LITTLE BIT LATER THAN THAT.

25 Q AND FOR HOW LONG DID YOU REMAIN A STAFF MEMBER?

26 A FOR FOUR AND A HALF YEARS I BELIEVE.

27 Q UNTIL ABOUT 1982?

28 A UH-HUH.

1 Q AND AFTER BEING A STAFF MEMBER UP TO 1982, DID
2 YOU CONTINUE TO BE AFFILIATED WITH THE CHURCH?
3 A NO.
4 Q HAVE YOU BEEN AFFILIATED WITH THE CHURCH SINCE
5 1982?
6 A NO, I HAVEN'T.
7 Q AND AS YOU SIT HERE TODAY, ARE YOU AFFILIATED
8 IN ANY WAY WITH THE CHURCH?
9 A NO.
10 Q WHILE YOU WERE AFFILIATED WITH THE CHURCH, WHAT
11 JOBS DID YOU HAVE?
12 A I WORKED IN THE SHIPPING DEPARTMENT. I ALSO
13 WENT ON SOME LECTURE TOURS. I HELPED OUT ON LECTURE TOURS
14 AND I SERVED MOSTLY IN THE CAFETERIA AS A COOK.
15 Q WHY DID YOU LEAVE THE CHURCH?
16 A JUST TIME TO MAKE A CHANGE FOR MYSELF, TO GET
17 INTO SOME THINGS THAT I HAVE BEEN WANTING TO DO.
18 Q DID ANYONE DO OR SAY ANYTHING TO PREVENT YOU
19 FROM LEAVING?
20 A NO, NOT WHATSOEVER.
21 Q ANYBODY THREATEN OR HARASS YOU IN ANY WAY ONCE
22 YOU DECIDED TO LEAVE?
23 A NO.
24 Q SINCE YOU LEFT THE CHURCH, HAVE YOU HAD ANY
25 CONTACT WITH CHURCH MEMBERS?
26 A NO, NONE WHATSOEVER.
27 Q DID YOU LIVE AT CAMELOT DURING THE YEARS 1979
28 AND 1980?

1 A YES, I DID.

2 Q DURING THAT PERIOD OF TIME, DID YOU WORK IN THE
3 KITCHEN?

4 A YES.

5 Q TELL US ABOUT THE FOOD. WHAT WAS THE TYPE OF
6 FOOD THAT WAS BEING SERVED AT THAT TIME?

7 A THE TYPE OF FOOD. IT WAS BASICALLY VEGETARIAN
8 IN NATURE. IT WAS VERY WHOLESOME HOME-COOKED MEALS. FULL
9 SALAD BARS NICE AS YOU WOULD GET AT MOST ANY RESTAURANT THAT
10 FEATURES REAL NICE SALAD BARS. WE ALSO SERVED A LOT OF
11 MEAT -- WELL, SOME MEAT. THERE WAS FISH THAT WAS SERVED AND
12 FOUL.

13 Q NOW, WHEN YOU WORKED AT CAMELOT IN THE KITCHEN,
14 WERE THERE CERTAIN PEOPLE THAT HAD PARTICULAR DIETARY NEEDS
15 THAT NECESSITATED CERTAIN SPECIAL TREATMENT BEING GIVEN TO
16 THEM?

17 A SURE.

18 Q WHAT WOULD HAPPEN WITH RESPECT TO THOSE PEOPLE?
19 CAN YOU GIVE US ANY EXAMPLES?

20 A THEIR NEEDS WERE CATERED TO BASICALLY. AS I
21 LOOK BACK ON IT NOW -- IT'S BEEN SEVERAL YEARS -- BUT, YOU
22 KNOW, WE HAD SPECIAL AREAS IN THE WALK-INS WHERE PEOPLE
23 COULD STORE SOME OF THEIR OWN GOODS AND, YOU KNOW, FOR SOME
24 OF THEIR OWN -- PEOPLE USED TO COME IN AND PREPARE THEIR OWN
25 MEALS EVEN FOR CERTAIN TREATMENTS, ET CETERA. SO THERE WAS
26 A LOT OF THAT THAT WENT ON.

27 Q WERE THERE EVER PEOPLE WHO NEEDED MORE MEAT
28 THAN WAS BEING SERVED ON A REGULAR BASIS?

1 A THERE WAS SOME, YOU KNOW. I DON'T REMEMBER HOW
2 MANY, BUT THERE WAS SOME.

3 Q AND DID THEY GET MORE MEAT IF THEY NEEDED IT?

4 A SURE.

5 Q FROM 1979 TO 1980 WHILE YOU LIVED AT CAMELOT,
6 HOW MANY HOURS A DAY DID YOU DECREE?

7 A ABOUT TWO AND A HALF TO THREE.

8 Q DID YOU EVER FEEL THAT DECREEEING IN ANY WAY
9 LESSENERED YOUR ABILITY TO MAINTAIN CONTROL OVER YOUR OWN
10 THOUGHTS AND ACTIONS?

11 A NO.

12 Q DID DECREEEING HAVE ANY EFFECT ON YOU?

13 A YEAH. IT WAS A CLEARING EFFECT, SO TO SPEAK.
14 IT FELT GOOD. IT WAS, YOU KNOW, YOU MIGHT RELATE IT TO
15 EXERCISING, YOU KNOW. IT WAS LIKE JOGGING AROUND THE BLOCK
16 OR SOMETHING. YOU FEEL REFRESHED, YOU FEEL GOOD.

17 Q DURING 1979 TO 1980 WHEN YOU LIVED AT CAMELOT,
18 HOW MANY HOURS OF SLEEP WOULD YOU GET IN A TYPICAL DAY?

19 A I WOULD SAY ANYWHERE FROM SIX TO EIGHT HOURS OR
20 MORE.

21 Q WHO DETERMINED HOW MANY HOURS A WEEK YOU WOULD
22 RECEIVE?

23 A USUALLY THE INDIVIDUAL, YOU KNOW, IN ACCORDANCE
24 WITH WHAT KIND OF WORK YOU HAD, WHAT WAS GOING ON. JUST
25 LIKE ANY OTHER JOB.

26 Q DID YOU GET WHAT YOU CONSIDERED TO BE ENOUGH
27 SLEEP FOR YOURSELF?

28 A SURE.

1 Q IF A PERSON WANTED TO GO OFF CAMPUS TO EAT IN
2 1979 TO 1980, COULD THEY DO THAT?

3 A SURE.

4 Q WERE THERE SOCIAL ACTIVITIES AT CAMELOT -- IN
5 CAMELOT FROM '79 TO '80?

6 A A LOT OF SOCIAL ACTIVITIES. THERE WAS A LOT OF
7 DANCES, PICNICS, YOU KNOW, WENT TO A LOT OF MOVIES, OUTINGS
8 TO THE BEACH, THINGS OF THAT NATURE.

9 Q DID YOU EVER FEEL GUILTY PARTAKING IN THOSE
10 SOCIAL ACTIVITIES?

11 A NO. IT WAS A LOT OF FUN.

12 Q DID YOU PARTAKE IN THEM?

13 A YEAH.

14 Q DID YOU HAVE ACCESS TO A TV WHILE YOU WERE
15 THERE?

16 A YES.

17 Q DID YOU HAVE A TV?

18 A I DID.

19 Q DID YOU HAVE A RADIO?

20 A YES.

21 Q DID YOU HAVE A PHONE?

22 A NO, BUT I HAD ACCESS TO ONE. I MEAN THERE WAS
23 A LOT OF PHONES THERE. THERE WAS NO TROUBLE FINDING A
24 PHONE.

25 Q ANY RESTRICTIONS ON CONTACT WITH PEOPLE WHO
26 WERE NONCHURCH MEMBERS, FAMILY, FRIENDS?

27 A NO. I ALWAYS MAINTAINED MY CONTACT WITH MY
28 PARENTS, MY SISTER, BROTHER AND A LOT OF FRIENDS BECAUSE I

1 GREW UP IN THE LOS ANGELES AREA. I STILL HAVE A LOT OF
2 FRIENDS.

3 Q WERE YOU EVER TAUGHT THAT YOU SHOULD FEAR
4 NONMEMBERS?

5 A NO.

6 Q WERE YOU EVER TAUGHT THAT YOU SHOULD NOT
7 COMMUNICATE WITH NONCHURCH MEMBERS?

8 A NO.

9 Q DID YOU HAVE A CAR WHILE YOU WERE AT CAMELOT?

10 A I DID, YES.

11 Q WOULD YOU DESCRIBE WHAT YOUR OPINION WAS OR
12 YOUR EXPERIENCE WAS IN LIVING AT CAMELOT? CAN YOU DESCRIBE
13 THAT FOR US?

14 A IT WAS A VERY GOOD LEARNING EXPERIENCE. IT WAS
15 VERY FULFILLING. IT WAS SPIRITUALLY VERY, VERY REWARDING
16 AND I LEARNED A LOT ABOUT LIFE IN GENERAL.

17 Q DID YOU ENGAGE IN FASTS WHILE YOU WERE AT
18 CAMELOT?

19 A PERIODICALLY FROM TIME TO TIME.

20 Q WERE THEY MANDATORY?

21 A NO, THEY WEREN'T. THEY WEREN'T AT ALL. THE
22 BENEFITS OF FASTING WAS DEFINITELY EXPLAINED AND THE REASONS
23 FOR IT. AND IF YOU COULDN'T DO IT FOR ANY REASON, SUCH AS
24 THERE WAS, YOU KNOW, YOU NEEDED TO DO SOMETHING, THERE WAS
25 OTHER FOOD AVAILABLE AT ALL TIMES AND VERY GOOD FOOD AT
26 THAT.

27 Q IN THE KITCHEN, WOULD ALL KINDS OF FOOD BE
28 AVAILABLE, THE SAME FOOD AS NORMAL, WHEN FASTS WERE GOING

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ON?

A SURE. FOR INSTANCE, ONE SIDE THERE WOULD BE THE FOOD THAT WAS SUGGESTED FOR FASTING OR THE VARIOUS TYPES OF JUICES, FOR INSTANCE, OR TEAS. AND THEN ON THE OTHER SIDE, A FULL MENU OF THAT DAY'S, YOU KNOW, MENU.

Q TALKING ABOUT JUICES, WHAT KIND OF JUICES WOULD THEY HAVE FOR PEOPLE WHO WERE FASTING?

A GENERALLY FRESH SQUEEZED. LET'S SAY FOR INSTANCE THERE WOULD BE CARROT JUICE, THERE WOULD BE WATERMELON JUICE, ORANGE JUICE. A LOT OF TIMES PEOPLE COULD GO INSIDE IF THEY WANTED TO FAST AND SQUEEZE THEIR OWN JUICES. THEN THERE WAS VERY GOOD APPLE JUICE AVAILABLE, TOO.

Q WERE THERE TIMES WHEN YOU CHOSE NOT TO FAST?

A I NEVER WAS REAL GOOD AT IT, TO TELL YOU THE TRUTH. BUT YEAH, THERE WAS TIMES WHEN I CHOSE NOT TO FAST.

Q ANYBODY EVER DO OR SAY ANYTHING TO YOU ON THE THOSE OCCASIONS?

A NO.

Q WAS IT EVER TAUGHT THAT ELIZABETH CLARE PROPHET IS GOD INCARNATE? DID THE CHURCH TEACH THAT?

A NO.

Q DID THE CHURCH EVER TEACH THAT ELIZABETH CLARE PROPHET IS PERFECT AND MAKES NO MISTAKES?

A NO, NOT WHATSOEVER.

Q WAS IT EVER TAUGHT THAT THE ONLY WAY YOU COULD MAKE YOUR ASCENSION WAS IF YOU WERE A MEMBER OF CHURCH UNIVERSAL AND TRIUMPHANT?

1 A NO. IT WAS JUST ANOTHER PATH, ONE OF THE MANY
2 PATHS THAT WERE OFFERED AND THAT ARE AVAILABLE TO PEOPLE OF
3 ALL WALKS OF LIFE.

4 Q WAS IT EVER TAUGHT THAT YOU WOULD DIE IF YOU
5 DIDN'T STAY WITH CHURCH UNIVERSAL AND TRIUMPHANT?

6 A NO.

7 Q YOU EVER HEARD ELIZABETH CLARE PROPHET OR ANY
8 CHURCH OFFICIAL EVER TELL ANYONE TO LIE OR STEAL OR CHEAT OR
9 DO ANYTHING THAT YOU CONSIDERED DISHONEST?

10 A NO.

11 Q YOU BELIEVE THAT THE CHURCH AND ELIZABETH CLARE
12 PROPHET WERE FAIR TO YOU WHEN YOU WERE THERE?

13 A YEAH. VERY FAIR.

14 Q YOU WERE A STAFF MEMBER FOR A PERIOD OF TIME.
15 WE HAVE BEEN TOLD -- THE JURY HAS BEEN TOLD THAT STAFF
16 MEMBERS ARE ROBOTS WHO ARE MANIPULATED AND CONTROLLED BY
17 ELIZABETH CLARE PROPHET.

18 DID ANYONE MANIPULATE AND CONTROL YOU WHEN YOU
19 WERE A MEMBER OF THIS CHURCH?

20 A NOT IN ANY WAY.

21 Q YOU SURE OF THAT?

22 A SURE.

23 Q YOU BELIEVE AND DID YOU BELIEVE WHEN YOU WERE A
24 STAFF MEMBER THAT YOU HAD THE FREE WILL TO STAY OR LEAVE ANY
25 TIME YOU WANTED?

26 A YES, I DID.

27 Q WERE YOU EVER FEARFUL THAT IF YOU LEFT THE
28 CHURCH, THAT EITHER SOMEONE WOULD DO SOMETHING TO YOU

1 PHYSICALLY OR SPIRITUALLY?

2 A NO.

3 Q ARE YOU AWARE OF ANY CHURCH MEMBERS EVER
4 HARASSING, THREATENING, INTIMIDATING ANYBODY WHO EVER LEFT
5 THE CHURCH?

6 A I AM NOT AWARE OF ANYTHING OF THAT NATURE.

7 Q ARE YOU AWARE OF ANYBODY EVER BEING TOLD BY A
8 CHURCH OFFICIAL TO HARASS OR THREATEN ANYONE WHO LEFT THE
9 CHURCH?

10 A NO.

11 Q DID YOU ATTEND SUMMIT UNIVERSITY?

12 A YES, I DID.

13 Q WHEN?

14 A BEGINNING IN 1977.

15 Q WITH RESPECT TO THE FOOD, IS IT ANY DIFFERENT
16 THAN WHAT YOU'VE DESCRIBED YOU HAD AT CAMELOT?

17 A NO. IT'S THE SAME FOOD, IT IS THE SAME DIET.

18 Q WITH RESPECT TO THE HOURS OF DECREERING AND ---
19 WAS THAT ANY DIFFERENT --- LET ME WITHDRAW THAT.

20 HOW MANY HOURS A DAY DID YOU DECREE WHEN YOU
21 WERE AT SUMMIT UNIVERSITY?

22 A PRETTY MUCH THE SAME. VERY SIMILAR.

23 Q WITH RESPECT TO SLEEP, DID YOU HAVE SUFFICIENT
24 SLEEP WHEN YOU WERE AT SUMMIT UNIVERSITY?

25 A YES.

26 Q BEFORE YOU WENT TO SUMMIT UNIVERSITY, DID YOU
27 KNOW WHAT YOU WERE GETTING INTO AS FAR AS RULES AND
28 REGULATIONS?

1 A YEAH. EVERYTHING WAS VERY CLEARLY STATED. AS
2 FAR AS THE DRESS CODE AND CONDUCT CODE, ET CETERA, I MEAN
3 ALL OF THAT WAS STIPULATED IN LITERATURE THAT EXPLAINED
4 ABOUT THE UNIVERSITY THOROUGHLY.

5 Q DID YOU KNOW THAT BEFORE YOU GOT THERE?

6 A YEAH.

7 Q WAS THE FASTING RULES ANY DIFFERENT AT SUMMIT
8 UNIVERSITY THAN YOU HAVE ALREADY DESCRIBED THAT IT WAS AT
9 CAMELOT?

10 A NO.

11 Q WERE YOU EVER TAUGHT EITHER AT CAMELOT OR
12 SUMMIT UNIVERSITY TO FEAR NONCHURCH MEMBERS?

13 A NO.

14 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY NOT
15 TO COMMUNICATE WITH NONCHURCH MEMBERS?

16 A NO.

17 Q ANY DOUBT IN YOUR MIND ABOUT THAT?

18 A NONE WHATSOEVER.

19 Q WHEN YOU WERE AT SUMMIT UNIVERSITY, DID YOU
20 HAVE FREE TIME?

21 A YEAH, QUITE A BIT.

22 Q WHEN?

23 A SATURDAYS, THE WEEKENDS. THERE WAS A LOT OF
24 FREE TIME IN THE WEEKENDS AND THE EVENINGS ALL THE TIME.

25 Q WHEN YOU WERE WITH THE CHURCH, WERE YOU A
26 PERMANENT STAFF MEMBER?

27 A BRIEFLY FOR ABOUT A YEAR, I BELIEVE.

28 Q WHOSE DECISION WAS IT FOR YOU TO BECOME A

1 PERMANENT STAFF MEMBER?

2 A IT WAS MINE. IT WAS MY DESIRE.

3 Q WERE YOU EVER PRESSURED IN ANY WAY TO BECOME A
4 PERMANENT STAFF MEMBER?

5 A NO.

6 Q WHEN YOU DECIDED YOU DIDN'T WANT TO BE A
7 PERMANENT STAFF MEMBER, WERE YOU EVER PRESSURED IN ANY WAY
8 TO REMAIN A PERMANENT STAFF MEMBER?

9 A NO.

10 Q DID YOU KNOW GREGORY MULL IN 1979 THROUGH 1980
11 WHEN HE LIVED AT CAMELOT?

12 A TO TELL YOU THE TRUTH, I DIDN'T KNOW HIM VERY
13 WELL PERSONALLY, BUT I KNEW HIM AS A MEMBER OF THE
14 COMMUNITY.

15 Q DID YOU EVER SEE HIM?

16 A UH-HUH.

17 Q DID YOU EVER SEE HIM IN THE CAFETERIA OR THE
18 KITCHEN?

19 A YEAH.

20 Q DID HE EVER SAY ANYTHING TO YOU TO THE EFFECT
21 THAT HE HAD SOME PROBLEM WITH THE FOOD IN THE KITCHEN WHEN
22 YOU WERE WORKING?

23 A HE DIDN'T SPEAK TO ME PERSONALLY.

24 Q DO YOU KNOW IF HE EVER SAID ANYTHING TO
25 ANYBODY?

26 A NO.

27 MR. KLEIN: THANK YOU.

28 I HAVE NO FURTHER QUESTIONS.

1 THE COURT: ALL RIGHT.

2 MR. LEVY: JUST A FEW.

3 THE COURT: WHY DON'T WE TAKE OUR AFTERNOON RECESS AT
4 THIS TIME AND THEN WE WILL RESUME. LET'S RESUME AT THREE
5 O'CLOCK.

6 (RECESS.)

7 THE COURT: PLEASE PROCEED.

8

9 CROSS-EXAMINATION +

10 BY MR. LEVY:

11 Q MR. STEIN, HOW OLD ARE YOU?

12 A TWENTY-NINE.

13 Q AND HOW OLD WERE YOU WHEN YOU BECAME AFFILIATED
14 WITH CHURCH UNIVERSAL AND TRIUMPHANT?

15 A TWENTY.

16 Q DID YOU OWN ANY REAL PROPERTY THEN?

17 A NO.

18 Q YOU TOLD US YOU HAD FINISHED HIGH SCHOOL. YOU
19 HAD NO COLLEGE DEGREES THEN?

20 A NO.

21 Q WHAT DID YOU DO TO MAKE A LIVING WHEN YOU WERE
22 20 YEARS OLD?

23 A I WAS IN THE RESTAURANT BUSINESS. I WAS A
24 WAITER.

25 Q YOUR NAME IS RICHARD STEIN. WHAT WAS YOUR
26 RELIGIOUS AFFILIATION BEFORE YOU BECAME A MEMBER OF CHURCH
27 UNIVERSAL AND TRIUMPHANT?

28 MR. KLEIN: I AM GOING TO OBJECT AS TO LEGAL

1 RELEVANCE, YOUR HONOR.

2 THE COURT: DO YOU WANT TO MAKE AN OFFER OF PROOF?

3 MR. LEVY: YES, YOUR HONOR.

4 THE COURT: ALL RIGHT.

5 (THE FOLLOWING PROCEEDINGS WERE HELD
6 AT THE BENCH:)

7 THE COURT: WHAT IS THE RELEVANCE OF HIS RELIGIONS?

8 MR. LEVY: I BELIEVE HIS RELIGIOUS EXPERIENCE WITH
9 HIS PARENTS IS NONSATISFACTORY JUST LIKE HIS EX-RELIGIOUS
10 EXPERIENCE WITH THE CHURCH WAS NONSATISFACTORY. AND I
11 BELIEVE THAT IT GOES TO -- HE LEFT THERE, HE LEFT HIS OWN
12 WHATEVER RELIGION HE WAS BROUGHT UP WITH, HE WENT TO THE
13 CHURCH, HE LEFT THE CHURCH.

14 I BELIEVE IT SHOWS THERE IS AN ONGOING PATTERN
15 OF DISSATISFACTION.

16 THE COURT: WHAT IS THE RELEVANCE OF THIS TO THE CASE
17 OF MULL VERSUS C.U.T.?

18 MR. LEVY: PROBABLY NONE NOW THAT YOU MENTION IT.

19 THE COURT: IT MIGHT BE INTERESTING HISTORICAL DATA
20 TO SOME PEOPLE, BUT MY CONCERN IS MULL VERSUS THE CHURCH
21 UNIVERSAL AND TRIUMPHANT.

22 MR. LEVY: I WILL BITE MY TONGUE AND GO THE OTHER
23 WAY.

24 THE COURT: OKAY. LET'S GO.

25 (THE PROCEEDINGS WERE RESUMED IN OPEN
26 COURT IN THE PRESENCE OF THE JURY:)

27 Q BY MR. LEVY: YOU BECAME A STAFF MEMBER OF THE
28 CHURCH IN FEBRUARY OR MARCH OF 1977?

1 A YES, SIR.

2 Q WAS THAT JUST REGULAR STAFF OR PERMANENT STAFF?

3 A THAT WAS REGULAR STAFF AT THAT TIME.

4 Q DID YOU EVER BECOME A MEMBER OF PERMANENT
5 STAFF?

6 A YES, I DID.

7 Q WHEN YOU BECAME A MEMBER OF PERMANENT STAFF,
8 DID YOU SIGN OVER YOUR BELONGINGS TO THE CHURCH?

9 A NO, I DIDN'T.

10 Q DID YOU HAVE ANY BELONGINGS TO SIGN OVER?

11 A I HAD A CAR AT THAT TIME.

12 Q THE CHURCH DIDN'T REQUIRE YOU TO SIGN THAT
13 OVER?

14 A NO. I SOLD IT AT A LATER DATE, AS A MATTER OF
15 FACT.

16 Q WAS THERE ANYTHING THAT YOU POSSESSED AT THE
17 TIME YOU BECAME PERMANENT STAFF THAT YOU TURNED OVER TO THE
18 CHURCH?

19 A NONE, NONE WHATSOEVER. I JUST TITHED, YOU
20 KNOW, ON A REGULAR BASIS LIKE A NORMAL CHURCH MEMBER WOULD
21 DO IN MOST OTHER RELIGIOUS GROUPS.

22 Q WHAT OTHER RELIGIOUS GROUPS ARE YOU TALKING
23 ABOUT WITH REGARD TO TITHING?

24 A I DON'T KNOW. YOU NAME A COUPLE.

25 Q HOW ABOUT THE JEWISH RELIGION? THEY TITHE
26 THERE?

27 A QUITE A BIT.

28 Q ARE YOU FAMILIAR WITH THE JEWISH RELIGION?

1 A NOT VERY MUCH.

2 Q ARE YOUR PARENTS JEWISH?

3 MR. KLEIN: I AM GOING TO OBJECT TO THE RELEVANCE,
4 YOUR HONOR.

5 THE COURT: SUSTAINED.

6 Q BY MR. LEVY: DID YOU DO ANYTHING OTHER THAN
7 TITHE TO THE CHURCH? DID YOU LIKE DONATE YOUR WORK?

8 A SURE.

9 Q WERE YOU RECEIVING A SALARY WHILE YOU WERE
10 LIVING AT CAMELOT AND WORKING AT CAMELOT?

11 A I WORKED OUTSIDE THE COMMUNITY AND I ALSO
12 MAINTAINED A JOB. I WORKED IN THE RESTAURANT BUSINESS AND
13 DID A COUPLE OF OTHER JOBS ALSO. SO I WAS ABLE TO TAKE CARE
14 OF MYSELF QUITE WELL.

15 Q OKAY. SO YOU HAD SEVERAL JOBS OUTSIDE OF THE
16 CHURCH?

17 A RIGHT.

18 Q WERE YOU CONTRIBUTING ANY HOURS OF WORK AT THE
19 CHURCH IN THE KITCHEN AT THE CHURCH?

20 A SURE.

21 Q ABOUT HOW MANY HOURS A MONTH?

22 A A MONTH?

23 Q LET'S SAY A WEEK.

24 A ABOUT A DAY.

25 Q ONE DAY A WEEK?

26 A NO. I'D SAY ABOUT A REGULAR DAY WAS ABOUT
27 EIGHT HOURS A DAY. YOU KNOW. AN EIGHT-HOUR DAY BASICALLY.

28 Q ASIDE FROM YOUR JOB OUTSIDE THE CHURCH, YOU

1 WERE WORKING A FULL EIGHT-HOUR DAY IN THE CHURCH?

2 A DEPENDED ON THE SCHEDULE.

3 Q WELL, SOMETIMES MAYBE A LITTLE BIT LESS THAN
4 EIGHT HOURS, SOMETIMES MAYBE A LITTLE BIT MORE?

5 A LIKE I SAID, IT DEPENDED ON THE SCHEDULE.

6 Q WHY DON'T YOU TELL ME WHAT THE SCHEDULE WAS.
7 HOW MANY HOURS IN THE AVERAGE DAY?

8 A IT VARIED QUITE A BIT. I MEAN IT NEVER WAS
9 ONE -- FOR FIVE YEARS THE SCHEDULE WAS NEVER THE SAME, I CAN
10 GUARANTEE THAT. SO, YOU KNOW.

11 Q WAS THERE ANY PARTICULAR REASON THAT SCHEDULE
12 KEPT JUMPING AROUND LIKE THAT THAT YOU KNOW OF?

13 A DOES YOUR SCHEDULE JUMP AROUND?

14 Q NOT REALLY. I GET UP IN THE MORNING, I READ
15 THE PAPER AND START MY DAY.

16 A OKAY.

17 Q CAN YOU EXPLAIN TO ME THE VARYING TIME
18 SCHEDULES DURING THOSE FIVE YEARS THAT YOU MENTIONED WITH
19 THE SCHEDULE JUMPING AROUND? I AM JUST TRYING TO UNDERSTAND
20 THE DIFFERENCE IN THE REGULAR SCHEDULE AND THE JUMPING
21 AROUND SCHEDULE.

22 MR. KLEIN: I AM GOING TO OBJECT. IT IS VAGUE AND
23 AMBIGUOUS EXACTLY WHAT SCHEDULE WE ARE TALKING ABOUT, YOUR
24 HONOR.

25 THE COURT: I THINK IT IS PRETTY CLEAR. IF YOU WANT
26 TO MAKE IT A LITTLE CLEARER.

27 MR. LEVY: I WILL TRY, YOUR HONOR.

28 Q ON THE AVERAGE DAY, MR. STEIN, AND I KNOW IT

1 VARIED SOMEWHAT, BUT --

2 A OKAY. BASICALLY WHAT YOU ARE LOOKING AT
3 PERHAPS I A LOT OF TIMES WOULD WORK ON THE WEEKENDS, YOU
4 KNOW. FRIDAY, SATURDAY AND SUNDAY IN THE EVENINGS. AND I
5 WORKED DURING THE WEEK, YOU KNOW, ON MY STAFF JOB.

6 Q OKAY. WHAT I WANT TO KNOW IS HOW MANY HOURS A
7 DAY YOU CONTRIBUTED TO THE CHURCH, NOT COUNTING THE WORK YOU
8 WERE DOING ON THE OUTSIDE OF THE CHURCH. AND YOU KNOW
9 BETTER THAN I DO, SO COULD YOU GIVE ME YOUR BEST ESTIMATE AS
10 TO HOW MANY HOURS A DAY YOU WOULD WORK FOR THE CHURCH?

11 A A DAY?

12 Q YES.

13 THE COURT: WOULD IT BE EASIER IF YOU TOLD US HOW
14 MANY HOURS?

15 THE WITNESS: I JUST THINK IT IS A STUPID QUESTION TO
16 TELL YOU THE TRUTH. I WOULD SAY ANYWHERE FROM -- ANYWHERE
17 FROM FOUR TO EIGHT HOURS, YOU KNOW. SOMETIMES EVEN LESS.

18 Q BY MR. LEVY: OKAY. AND LET'S GO WITH YOUR LOW
19 ESTIMATE, FOUR HOURS A DAY, SEVEN DAYS A WEEK, 28 HOURS --

20 A IT WASN'T ALWAYS SEVEN DAYS A WEEK.

21 Q WELL, THAT VARIED, TOO?

22 A YEAH. LIKE I SAID BEFORE, IT VARIED.

23 THE COURT: IN AN AVERAGE WEEK, HOW MANY HOURS WOULD
24 YOU WORK FOR THE CHURCH? AND THAT --

25 THE WITNESS: I WOULD SAY ABOUT -- ABOUT 25.

26 Q BY MR. LEVY: OKAY. AND WHAT WAS YOUR
27 COMPENSATION FROM THE CHURCH FOR THOSE 25 HOURS OF WORK?

28 A WHAT WAS MY COMPENSATION? I HAD MY LIVING

1 EXPENSES WERE TAKEN CARE OF AND MY FOOD EXPENSES WERE TAKEN
2 CARE OF IF THAT IS WHAT YOU MEAN BY "COMPENSATION."

3 Q DID YOU GET ANY PAYMENT IN DOLLARS FOR YOUR
4 WORK?

5 A NO, I DIDN'T. BUT I NEVER REALLY NEEDED TO.

6 Q ARE YOU A VEGETARIAN NOW?

7 A NO, I'M NOT. I NEVER WAS.

8 Q AT THE TIME YOU WERE WORKING IN THE KITCHEN AT
9 CHURCH UNIVERSAL AND TRIUMPHANT, WAS THE PRIMARY FOOD A
10 VEGETARIAN DIET?

11 A YES, SIR.

12 Q WHEN YOU WERE THERE, DID YOU FOLLOW THAT
13 PRIMARY DIET AS A VEGETARIAN?

14 A PRIMARILY.

15 Q YOU FIGURED THAT VEGETARIAN DIET WAS A GOOD,
16 HEALTHY, NUTRITIOUS, BALANCED, WONDERFUL DIET, DID YOU?

17 A I NEVER WAS UNDERWEIGHT.

18 Q I NOTICE. IS THERE ANY PARTICULAR REASON WHY
19 NOW THAT YOU'VE LEFT THE CHURCH YOU DON'T FOLLOW THAT
20 WONDERFUL DIET NOW?

21 A YOU KNOW, I -- I STILL DO. I MEAN I AM NOT A
22 STRICT VEGETARIAN BY VEGETARIAN STANDARDS, BUT I DO HAVE A
23 FAIRLY DISCIPLINED DIET AT THIS POINT.

24 Q SINCE YOU'VE LEFT THE CHURCH -- AND WHEN WAS IT
25 AGAIN THAT YOU LEFT THE CHURCH?

26 A ABOUT 1981. IN THE SUMMER OF 1981 OR '82, I
27 BELIEVE.

28 Q HAVE YOU MADE ANOTHER RELIGIOUS AFFILIATION

1 SINCE THAT TIME?

2 A I GO TO A COUPLE DIFFERENT CHURCHES.

3 Q YOU WANT TO TELL US WHICH ONES YOU GO TO?

4 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCY,
5 YOUR HONOR.

6 THE COURT: HE CAN ANSWER.

7 THE WITNESS: I GO TO S.R.F. AND --

8 THE COURT: WILL YOU KEEP YOUR VOICE UP SO WE CAN ALL
9 HEAR.

10 THE WITNESS: SURE. I GO TO S.R.F., WHICH IS A --
11 ANOTHER CHURCH. AND ALSO ONCE IN A WHILE, I JUST GO TO
12 CHURCH WITH MY GIRL FRIEND.

13 Q BY MR. LEVY: AND WOULD YOU TELL US WHAT S.R.F.
14 IS?

15 A IT IS CALLED THE SELF-REALIZATION FELLOWSHIP.

16 Q AND THE ONE THAT YOU GO TO WITH YOUR GIRL
17 FRIEND, WHICH ONE IS THAT?

18 A IT IS A METHODIST CHURCH, JUST A NORMAL
19 CHRISTIAN CHURCH.

20 Q DID YOU KNOW MR. MULL WHILE YOU WERE AT CHURCH
21 UNIVERSAL AND TRIUMPHANT?

22 A I KNEW -- NOT ON A PERSONAL BASIS.

23 Q DID YOU HAVE ANYTHING TO DO WITH THE
24 NEGOTIATIONS THAT BROUGHT HIM TO CAMELOT IN THE FIRST PLACE?

25 A NO, SIR.

26 Q WERE YOU ONE OF THE SIGNATORIES OF THE
27 FULL-PAGE AD THAT THE CHURCH RAN?

28 A EXCUSE ME?

1 Q I SAID WERE YOU ONE OF THE SIGNATORIES ON THE
2 FULL-PAGE ADVERTISEMENT THAT THE CHURCH RAN IN THE
3 NEWSPAPER?

4 A NO, SIR.

5 Q WHAT ABOUT THE ONE ABOUT BILL MALEK?

6 A I AM NOT FAMILIAR WITH THAT, SIR.

7 Q DO YOU KNOW MR. BILL MALEK?

8 A NO, SIR.

9 Q NEVER MET HIM WHILE YOU WERE AT CHURCH
10 UNIVERSAL AND TRIUMPHANT?

11 A NO.

12 Q WHAT ABOUT RANDALL KING? DO YOU KNOW RANDALL
13 KING?

14 A YES, I DO KNOW RANDALL. I DON'T KNOW HIM NOW,
15 BUT I KNEW HIM.

16 Q DID YOU KNOW HIM WELL?

17 A NO.

18 Q WHAT ABOUT DONALD TROWBRIDGE? DID YOU KNOW
19 HIM?

20 A NOT VERY WELL.

21 Q DID YOU KNOW ANYBODY VERY WELL BACK IN THE DAYS
22 WHEN YOU WERE THERE?

23 A SOME PEOPLE.

24 Q ANY OF THEM THAT ARE CONNECTED WITH THIS
25 PARTICULAR CASE?

26 MR. KLEIN: I AM GOING TO OBJECT FOR LACK OF
27 FOUNDATION, YOUR HONOR.

28 THE COURT: SUSTAINED.

1 Q BY MR. LEVY: MONROE SHEARER, DO YOU KNOW HIM?

2 A I KNOW HIM.

3 Q EDWARD FRANCIS, DO YOU KNOW HIM?

4 A YES, I DO.

5 Q FRIENDS OF YOURS?

6 A NOT VERY CLOSE FRIENDS, YOU KNOW. I MEAN I
7 NEVER WORKED WITH THEM VERY CLOSELY. I MEAN I KNOW THEM,
8 YOU KNOW, AN ACQUAINTANCE. IT IS A LARGE COMMUNITY. I DO
9 KNOW SEVERAL OTHER PEOPLE IN THE COMMUNITY VERY CLOSE.

10 Q ONE LAST QUESTION, MR. STEIN. YOU DIDN'T HAVE
11 ANY PROPERTY WHEN YOU JOINED. YOU DIDN'T HAVE ANY DEGREES
12 AND YOU DIDN'T HAVE A PROFESSION.

13 BUT AS I UNDERSTAND IT CORRECTLY, YOU WERE
14 TITHING AND MORE OR LESS DONATING YOUR LABORS WORKING IN THE
15 KITCHEN SOME 25 HOURS A WEEK PRIOR TO YOUR LEAVING THE
16 CHURCH; IS THAT CORRECT?

17 A YES.

18 Q WOULD I BE CORRECT IN ASSUMING THAT THERE WAS
19 NOTHING ELSE THAT YOU HAD TO OFFER THE CHURCH, AND SO THERE
20 WAS NOTHING ELSE THAT THEY SOUGHT FROM YOU AND DIDN'T STOP
21 YOU FROM LEAVING?

22 MR. KLEIN: I AM GOING TO OBJECT TO THAT QUESTION,
23 YOUR HONOR, AS CALLING FOR A CONCLUSION, AS SPECULATION.

24 THE COURT: SUSTAINED.

25 MR. LEVY: NOTHING FURTHER OF MR. STEIN.

26 THE COURT: ANY QUESTIONS?

27 MR. KLEIN: YES, YOUR HONOR. JUST ONE QUESTION.

28 ///

1 REDIRECT EXAMINATION +

2 BY MR. KLEIN:

3 Q YOU WORKED FOR 25 HOURS A WEEK FOR THE CHURCH.
4 YOU ONLY RECEIVED ROOM AND BOARD. YOU DIDN'T RECEIVE ANY
5 SALARY.

6 WHY DID YOU DO THAT?

7 A MY LOVE FOR THE CHURCH, MY LOVE FOR SPIRITUAL
8 PATH.

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

10 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

11 THE COURT: OKAY. YOU ARE EXCUSED.

12 MR. KLEIN: MR. CHARLES BRIGHT, YOUR HONOR.

13
14 CHARLES CHRISTOPHER BRIGHT, +

15 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
16 TESTIFIES AS FOLLOWS:

17 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.
18 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL
19 YOUR FIRST AND LAST NAME.

20 THE WITNESS: CHARLES CHRISTOPHER BRIGHT.

21 C-H-A-R-L-E-S; CHRISTOPHER, C-H-R-I-S-T-O-P-H-E-R; BRIGHT,
22 B-R-I-G-H-T.

23 THE CLERK: THANK YOU.

24
25 DIRECT EXAMINATION +

26 BY MR. KLEIN:

27 Q MR. BRIGHT, ARE YOU CURRENTLY A STAFF MEMBER AT
28 CHURCH UNIVERSAL AND TRIUMPHANT?

1 A YES. I AM AT THE ROYAL TETON RANCH.

2 Q THAT IS IN MONTANA?

3 A YES.

4 Q HOW LONG HAVE YOU BEEN A STAFF MEMBER?

5 A SINCE APRIL OF 1979.

6 Q I WANT TO DIRECT YOUR ATTENTION BACK TO 1979
7 AND 1980. WERE YOU LIVING AT CAMELOT AT THAT TIME?

8 A YES.

9 Q DID YOU KNOW GREGORY MULL AT THAT TIME?

10 A YES.

11 Q DID YOU WORK WITH MR. MULL AT THAT TIME?

12 A I DID.

13 Q WHAT KIND OF WORK DID YOU DO?

14 A I DID DRAFTING.

15 Q WHO WAS YOUR BOSS?

16 A GREGORY MULL.

17 Q HOW OFTEN DID YOU WORK WITH HIM?

18 A ON A DAILY BASIS.

19 Q WHO GAVE YOU ASSIGNMENTS?

20 A MR. MULL.

21 Q DID YOU SPEAK TO HIM EVERY DAY?

22 A OH, YES.

23 Q WERE YOU AWARE OF THE PROJECTS THAT HE WAS
24 WORKING ON?

25 A I WAS.

26 Q WHAT IS A PRELIMINARY ARCHITECTURAL DRAWING?

27 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
28 HONOR. THERE HAS BEEN NO FOUNDATION THAT THIS MAN HAS ANY

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EXPERTISE IN ARCHITECTURE.

THE COURT: SUSTAINED.

Q BY MR. KLEIN: DO YOU KNOW WHAT A PRELIMINARY ARCHITECTURAL DRAWING IS?

A YES.

Q DID YOU EVER WORK ON PRELIMINARY ARCHITECTURAL DRAWINGS?

A YES.

Q HAVE YOU OVER THE YEARS HAD OCCASION TO WORK ON PRELIMINARY ARCHITECTURAL DRAWINGS?

A YES.

Q WHAT IS A PRELIMINARY ARCHITECTURAL DRAWING?

MR. LEVY: I AM STILL GOING TO OBJECT, YOUR HONOR. WE STILL HAVE NO FOUNDATION AS TO --

THE COURT: SUSTAINED.

Q BY MR. KLEIN: DO YOU HAVE ANY DRAFTING TRAINING?

A YES.

Q WHAT IS THE EXTENT OF THE DRAFTING TRAINING?

A ABOUT FOUR AND A HALF YEARS IN JUNIOR HIGH AND HIGH SCHOOL.

Q AND DID THERE COME A TIME WHEN YOU GOT ANY PRACTICAL EXPERIENCE AT DRAFTING?

A YES.

Q AND HOW DID YOU GET THAT?

A WORKING WITH MR. MULL AND THEN AGAIN WORKING WITH OUR ENGINEER AND ARCHITECT AT THE ROYAL TETON RANCH.

Q HOW LONG DID YOU WORK WITH MR. MULL?

1 A SIX MONTHS.

2 Q AND WHAT WAS YOUR -- LET ME WITHDRAW THAT.

3 DID YOU WORK WITH MR. MULL THE ENTIRE TIME HE
4 WAS AT CAMELOT?

5 A NO.

6 Q WHAT PART OF THAT TIME DID YOU WORK WITH HIM,
7 DO YOU KNOW?

8 A IT WAS ABOUT APRIL, 1979, TO OCTOBER, 1979.

9 Q AND WHAT KIND OF WORK DID YOU DO FOR HIM?

10 A DRAFTING.

11 Q SPECIFICALLY WHAT KIND OF DRAFTING?

12 A ON PRELIMINARY DRAWINGS.

13 Q AND WHAT IS A PRELIMINARY DRAWING?

14 MR. LEVY: I AM STILL GOING TO OBJECT, YOUR HONOR.

15 THIS WITNESS HAS ONLY TESTIFIED --

16 THE COURT: I'VE HEARD THE TESTIMONY. SUSTAINED.

17 Q BY MR. KLEIN: WHY DON'T YOU JUST TELL US
18 HOW -- WHAT YOUR DUTIES WERE WHEN YOU WORKED FOR MR. MULL?

19 A I WAS -- BASICALLY I WAS A DRAFTSMAN AND I
20 WORKED ON THE ASSIGNMENTS THAT I WAS GIVEN BY MR. MULL THAT
21 WE WERE DOING FOR THE CHURCH.

22 Q AND WHAT SPECIFICALLY WOULD YOU DO?

23 A DREW PLANS.

24 Q NOW, WERE YOU -- WITHDRAWN.

25 DID YOU WORK FULL-TIME DURING THOSE SIX MONTHS
26 ON DRAFTING?

27 A YES.

28 Q AND DID YOU DISCUSS WITH MR. MULL WHAT HE WAS

1 DOING AND WHAT YOU WERE DOING?

2 A YES.

3 Q AT THIS TIME I AM GOING TO SHOW YOU WHAT'S BEEN
4 MARKED EXHIBIT 1 IN EVIDENCE. HAVE YOU EVER SEEN THAT
5 DOCUMENT BEFORE, THAT PAMPHLET?

6 A YES, I HAVE.

7 Q WHAT IS THAT?

8 A IT IS THE TEN-YEAR MASTER PLAN FOR CAMELOT.

9 Q I DIRECT YOUR ATTENTION TO PAGE 32. ON PAGE
10 32, DO YOU SEE WHERE IT LISTS THE DIFFERENT PROJECTS FOR THE
11 TEN-YEAR PLAN?

12 A YES.

13 Q AND EACH ONE HAS A PARTICULAR PROJECT WITH A
14 MONEY NUMBER NEXT TO IT AND IT ALL ADDS UP TO \$33,290,000?

15 A THAT'S CORRECT.

16 Q HAVE YOU HAD AN OPPORTUNITY TO LOOK THROUGH THE
17 ARCHITECTURAL DRAWINGS THAT WE HAVE MARKED NUMBER 35 IN
18 EVIDENCE?

19 A YES.

20 Q DID YOU GO THROUGH ALL OF THOSE DRAWINGS?

21 A YES.

22 Q AND BASED ON -- I AM GOING TO ASK YOU SOME
23 QUESTIONS. I WANT YOU TO BASE YOUR ANSWERS ON WHAT YOU
24 RECALL WHEN YOU WORKED WITH MR. MULL IN CAMELOT IN 1979 AND
25 WHAT YOU HAVE SEEN IN THE BOX TODAY.

26 OF THE 12 PROJECTS THAT ARE LISTED IN THE
27 TEN-YEAR PLAN, DID THE ARCHITECTURAL DEPARTMENT OR MR. MULL,
28 TO YOUR KNOWLEDGE, DO ANY KIND OF DRAWINGS WITH RESPECT TO

1 THE MONTESSORI INTERNATIONAL?

2 A YES, HE DID.

3 Q WITH RESPECT TO THE 11 OTHER PROJECTS LISTED IN
4 THE TEN-YEAR PLAN, DID MR. MULL OR THE ARCHITECTURAL
5 DEPARTMENT DO ANY KIND OF DRAWINGS WITH RESPECT TO THAT?

6 A NO.

7 Q DID YOU HAVE AN OPPORTUNITY TO LOOK THROUGH
8 THOSE DOCUMENTS?

9 A I DID.

10 Q WHEN YOU LOOKED THROUGH THOSE DOCUMENTS, DID
11 YOU SEE ANY PLANS AT ALL ON ANY OF THE OTHER 11 PROJECTS
12 OTHER THAN THE MONTESSORI INTERNATIONAL?

13 A NO, I DIDN'T.

14 Q WITH RESPECT TO THE MONTESSORI INTERNATIONAL,
15 WHEN YOU LOOKED THROUGH THOSE PLANS, DID YOU COUNT UP HOW
16 MANY OF THOSE PLANS DEALT WITH MONTESSORI INTERNATIONAL, HOW
17 MANY OF THOSE DRAWINGS?

18 A ABOUT 70.

19 Q HOW MUCH?

20 A SEVENTY.

21 Q NOW, OF THE 70 THAT DEALT WITH THE MONTESSORI
22 INTERNATIONAL, WERE ANY OF THEM DUPLICATES?

23 A YES.

24 Q EXPLAIN HOW YOU GET A DUPLICATE OF AN
25 ARCHITECTURAL DRAWING.

26 A IT IS MADE FROM THE ORIGINAL DRAWING AND IT IS
27 RUN THROUGH A BLUEPRINT MACHINE TO GIVE AS MANY PRINTS OF
28 THAT SPECIFIC DRAWING AS REQUIRED.

1 Q SO IF YOU HAVE THE ORIGINAL DRAWING, YOU PRINT
2 OUT ONE BLUEPRINT. AND THEN IF YOU WANT TO MAKE A CHANGE OR
3 A MODIFICATION IN THE DRAWING, WHERE WOULD YOU MAKE THIS?
4 ON ANOTHER BLUEPRINT OR WOULD YOU MAKE IT ON THE ORIGINAL?

5 A YOU MAKE IT ON THE ORIGINAL AND THEN YOU RUN
6 ANOTHER PRINT.

7 Q ARE YOU SAYING THAT YOU COUNTED AT LEAST 30
8 DRAWINGS IN THERE THAT CAME FROM THE SAME ORIGINAL?

9 A YES.

10 Q AND THEY HAD MODIFICATIONS ON SOME OF THEM?

11 A MAYBE SOME MINOR CHANGES.

12 Q AND WITH RESPECT TO ALL THE OTHER PROJECTS
13 LISTED ON THAT TEN-YEAR PLAN, DID YOU SEE ANYTHING IN THAT
14 BOX THAT HAD TO DO WITH ANY OF THESE OTHER PROJECTS?

15 A NO.

16 Q WITH RESPECT TO THESE OTHER PROJECTS, WHEN YOU
17 WORKED WITH MR. MULL IN 1979, DID YOU EVER SEE ANY WORK, ANY
18 ARCHITECTURAL DRAWINGS WITH RESPECT TO ANY OF THESE OTHER
19 PROJECTS IN THE TEN-YEAR PLAN OTHER THAN THE MONTESSORI?

20 A NO, I DIDN'T.

21 Q WITH RESPECT TO THE DRAWINGS THAT YOU DID SEE
22 IN THAT BOX DEALING WITH MONTESSORI, ARE THOSE DRAWINGS OF A
23 FINALITY THAT THEY CAN BE JUST TAKEN BY A CONTRACTOR AND HE
24 CAN START BUILDING THAT MONTESSORI?

25 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR, TO THIS
26 WITNESS ANSWERING THAT QUESTION. WE HAVE NOT YET
27 ESTABLISHED HIS EXPERTISE AS ANYTHING OTHER THAN A JUNIOR
28 HIGH SCHOOL --

1 THE COURT: JUST STATE THE GROUNDS, PLEASE.

2 MR. LEVY: YES, YOUR HONOR.

3 THE COURT: SUSTAINED.

4 Q BY MR. KLEIN: HOW LONG DID YOU LIVE AT
5 CAMELOT?

6 A FROM 19 -- APRIL, 1979, TILL NOVEMBER, 1981.

7 Q HOW WOULD YOU DESCRIBE YOUR EXPERIENCE LIVING
8 AT CAMELOT?

9 A AS FAR AS WHAT GOES?

10 Q AS FAR AS JUST LIFE IN GENERAL, WHAT DID YOU
11 THINK OF LIVING THERE?

12 A I LIKED IT VERY MUCH.

13 Q DID YOU GET ADEQUATE SLEEP?

14 A OH, YES.

15 Q ADEQUATE FOOD?

16 A YES. THE FOOD WAS MORE THAN ADEQUATE.

17 Q HOW MANY HOURS A DAY DID YOU DECREE?

18 A PROBABLY AROUND THREE.

19 Q DID YOU EVER FEEL OR DO YOU NOW FEEL THAT
20 DECREEING IN ANY WAY LESSENS YOUR ABILITY TO CONTROL YOUR
21 OWN THOUGHTS OR ACTIONS?

22 A NO.

23 Q ANY DOUBT ABOUT THAT?

24 A NO, NOT AT ALL.

25 Q YOU TALKED TO GREGORY MULL ON A DAILY BASIS?

26 A YES.

27 Q WOULD YOU CONSIDER HIM YOUR FRIEND?

28 A AT THE TIME.

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Q DO YOU KNOW -- WITHDRAWN.

DID HE EVER COMPLAIN TO YOU ABOUT CONDITIONS AT
CAMELOT DURING THE YEAR YOU -- DURING THE SIX MONTHS YOU
WORKED WITH HIM?

A NO.

Q AT CAMELOT, WERE PEOPLE ALLOWED TO HAVE A
REFRIGERATOR IN THEIR ROOM?

A YES.

Q DID GREGORY MULL HAVE ONE?

A YES.

Q DID HE HAVE A BED IN HIS ROOM?

A YES.

Q YOU SURE OF THAT?

A ABSOLUTELY.

Q DURING THE YEARS YOU HAVE BEEN WITH THE CHURCH,
WERE YOU EVER TAUGHT NOT TO HAVE ANY COMMUNICATION WITH
OUTSIDERS, NONCHURCH MEMBERS?

A NO, NEVER.

Q HAVE YOU HAD ANY CONTACT DURING THE YEARS YOU
HAVE BEEN WITH THE CHURCH WITH YOUR FAMILY AND FRIENDS WHO
WERE NOT CHURCH MEMBERS?

A YES, CERTAINLY.

Q ANY KIND OF RESTRICTION ON THAT EVER?

A NO.

Q WHAT KIND OF CONTACT HAVE YOU HAD WITH YOUR
PARENTS SINCE YOU HAVE BEEN A CHURCH MEMBER?

MR. LEVY: OBJECTION, YOUR HONOR. RELEVANCE.

THE COURT: HE CAN ANSWER.

1 THE WITNESS: I VISIT THEM -- I HAVE VISITED THEM
2 IN -- AT THEIR HOME ON FOUR SEPARATE OCCASIONS.

3 Q BY MR. KLEIN: WERE YOU EVER TAUGHT THAT IF YOU
4 LEAVE THE CHURCH, YOU WON'T MAKE YOUR ASCENSION?

5 A NO.

6 Q WERE YOU EVER TAUGHT IF YOU LEAVE THE CHURCH,
7 YOU WILL DIE?

8 A NO.

9 Q YOU ARE A STAFF MEMBER. HOW MANY YEARS HAVE
10 YOU BEEN A STAFF MEMBER DID YOU SAY?

11 A SINCE 1979. THAT IS GOING ON SEVEN YEARS.

12 Q WE HAVE HEARD TESTIMONY THAT STAFF MEMBERS ARE
13 ROBOTS WHO ARE MANIPULATED AND CONTROLLED BY ELIZABETH CLARE
14 PROPHET AND OTHER CHURCH OFFICIALS.

15 DOES ANYBODY CONTROL YOU?

16 A NO.

17 Q YOU SURE OF THAT?

18 A YES.

19 Q DO YOU BELIEVE YOU HAVE FREE WILL TO STAY WITH
20 THE CHURCH OR LEAVE THE CHURCH ANY TIME YOU WANT?

21 A ABSOLUTELY.

22 Q WHEN GREGORY MULL LEFT THE CHURCH, WAS THERE A
23 STAFF MEETING AT WHICH HE WAS DISCUSSED?

24 A NOT TO MY RECOLLECTION.

25 Q WAS THERE ANY KIND OF MEETING AT WHICH HE WAS
26 DISCUSSED AFTER HE LEFT THE CHURCH?

27 A I DON'T RECALL ONE.

28 Q YOU WERE IN GREGORY MULL'S ROOM ON MANY

1 OCCASIONS?

2 A YES.

3 Q DO YOU KNOW THE SIZE OF THE ROOM?

4 A YES.

5 Q WHAT IS THE SIZE?

6 A IT IS TEN-SIX BY ELEVEN-SIX WITH A NINE FOOT

7 CEILING.

8 Q HOW DO YOU KNOW THAT?

9 A I MEASURED IT.

10 Q TO YOUR KNOWLEDGE, WERE ANY OF THE

11 ARCHITECTURAL DRAWINGS THAT WERE TURNED OUT BY EITHER

12 GREGORY MULL OR THE ARCHITECTURAL DEPARTMENT EVER USED FOR

13 FUND RAISING AT A CHURCH CONFERENCE?

14 A NO.

15 Q IN THE GROUP OF DRAWINGS THAT YOU LOOKED AT,

16 THE ARCHITECTURAL DRAWINGS, ARE THERE SOME DRAWINGS OF WHAT

17 IS CALLED A WILL OF GOD FOCUS?

18 A YES.

19 Q WHAT IS THAT?

20 A IT WAS A SMALL CHAPEL THAT WE CONSTRUCTED AT

21 OUR LOS ANGELES CENTER.

22 Q HOW MANY PEOPLE DID IT SEAT OR DOES IT SEAT?

23 A MAYBE A DOZEN.

24 Q WAS THE WILL OF GOD FOCUS ONE OF THE PROJECTS

25 ON THE TEN-YEAR PLAN?

26 A NO, IT WAS NOT.

27 MR. KLEIN: THANK YOU.

28 I HAVE NO FURTHER QUESTIONS.

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MR. LEVY: THANK YOU, YOUR HONOR.

CROSS-EXAMINATION +

BY MR. LEVY:

Q MR. BRIGHT, YOU TOLD US THAT WHEN YOU AND MR. MULL WORKED TOGETHER AT CAMELOT, HE WAS A FRIEND OF YOURS AT THAT TIME; IS THAT CORRECT?

A YES.

Q IS HE A FRIEND OF YOURS NOW?

A I HAVE NO -- I HAVE HAD NO INTERACTION WITH HIM SINCE HE LEFT WHATSOEVER.

Q DO YOU KNOW ANY OF THE TERMS AND CONDITIONS UNDER WHICH HE LEFT?

A NO. UNDER HIS OWN FREE WILL.

Q WERE YOU THERE WHEN HE LEFT?

A I WAS ON STAFF AT THE TIME, YES.

Q WERE YOU PRESENT WHEN HE LEFT?

A (NO AUDIBLE RESPONSE.)

Q WERE YOU PRESENT WITH MR. MULL AT THE TIME HE EXITED WHAT IS KNOWN AS CAMELOT?

A WHEN HE ACTUALLY LEFT THE PROPERTY?

Q YES.

A NO.

Q WERE YOU PRESENT WHEN HE HAD THE LAST MEETING WITH MEMBERS OF STAFF BEFORE HE LEFT CAMELOT?

A I DON'T THINK I UNDERSTAND WHAT YOU MEAN.

Q WHAT I AM TELLING YOU IS THAT THERE WAS A MEETING BETWEEN MR. MULL AND SOME OF THE MEMBERS OF STAFF

1 PRIOR TO MR. MULL LEAVING CAMELOT.

2 MY QUESTION TO YOU IS WERE YOU PRESENT?

3 A NO, I WASN'T.

4 Q NOW, SO YOU REALLY ACTUALLY HAVE NO KNOWLEDGE
5 OTHER THAN JUST WHAT YOU SURMISE ABOUT THE TERMS AND
6 CONDITIONS UNDER WHICH HE LEFT?

7 A COULD YOU REPEAT THAT AGAIN? I DON'T THINK I
8 FOLLOW WHAT YOU MEAN.

9 Q WELL, IF YOU WEREN'T AT THE STAFF MEETING --

10 A RIGHT.

11 Q -- AND YOU DIDN'T SEE HIM LEAVE, DO YOU HAVE
12 ANY KNOWLEDGE OF THE TERMS AND CONDITIONS UNDER WHICH MR.
13 MULL LEFT CAMELOT?

14 A YES. HE LEFT UNDER HIS OWN FREE WILL.

15 Q IF YOU WEREN'T THERE AND YOU DIDN'T
16 PARTICIPATE, HOW DID YOU CONCLUDE HE LEFT UNDER HIS OWN FREE
17 WILL?

18 A BECAUSE THAT IS WHAT HE DID.

19 Q WELL, HOW DO YOU KNOW THAT?

20 A HE JUST LEFT.

21 Q IF YOU WEREN'T THERE, WHERE DO YOU GET THIS
22 INFORMATION? DID IT COME LIKE ELIZABETH'S INFORMATION, FROM
23 OUTER SPACE?

24 MR. KLEIN: I AM GOING TO OBJECT TO ARGUMENTATIVE,
25 VAGUE AND AMBIGUOUS.

26 THE COURT: PLEASE REPHRASE IT.

27 Q BY MR. LEVY: DID ANYONE AT CAMELOT TELL YOU
28 THE TERMS AND CONDITIONS UNDER WHICH GREGORY MULL EXITED

1 CAMELOT?

2 A TERMS AND CONDITIONS? WHAT DO YOU MEAN BY
3 THAT? HE -- HE DECIDED TO LEAVE THE STAFF UNDER HIS OWN
4 FREE WILL AND HE LEFT.

5 Q NOW, I WANT TO KNOW HOW YOU KNOW THAT HE
6 DECIDED OF HIS OWN FREE WILL TO LEAVE AND THEN HE LEFT?

7 A THAT IS WHAT HE TOLD PEOPLE.

8 Q DID HE EVER TELL YOU THAT?

9 A PERSONALLY?

10 Q YES.

11 A NO.

12 Q WHILE YOU WERE AT CAMELOT -- BY THE WAY, YOU
13 ARE STILL ON STAFF THERE, RIGHT?

14 A YES.

15 Q ARE YOU PERMANENT STAFF OR JUST PROBATIONARY
16 STAFF?

17 A PROBATIONARY STAFF.

18 Q IF YOU BECOME PERMANENT STAFF, DO YOU HAVE TO
19 TURN OVER PROPERTY AND POSSESSIONS IN ORDER TO BE ON
20 PERMANENT STAFF?

21 A NO.

22 Q THAT'S NEVER BEEN A REQUIREMENT --

23 A NO.

24 Q -- WHILE YOU'VE BEEN THERE?

25 A (SHAKES HEAD FROM SIDE TO SIDE.)

26 Q NOW IF I EXPLAIN TO YOU THAT MISS PROPHET TOLD
27 US THAT WHEN A PERSON COMES ON PERMANENT STAFF, ONE OF THE
28 REQUIREMENTS IS TO TURN OVER THEIR POSSESSIONS TO THE

1 CHURCH, DO I UNDERSTAND CORRECTLY THAT YOU HAVE A DIFFERENT
2 UNDERSTANDING OF THAT THAN SHE DOES?

3 MR. KLEIN: I WOULD OBJECT. THAT MISCHARACTERIZES
4 THE TESTIMONY, YOUR HONOR.

5 THE COURT: OVERRULED.

6 THE WITNESS: COULD YOU REPEAT YOUR QUESTION?

7 Q BY MR. LEVY: WHAT I WANT TO KNOW IS IF YOU
8 HAVE A DIFFERENT UNDERSTANDING THAN WHAT MISS PROPHET TOLD
9 US ABOUT --

10 A YES.

11 Q YOU DO HAVE A DIFFERENT UNDERSTANDING?

12 A YES.

13 Q HAS ANYONE FROM THE CHURCH EVER DISCUSSED WITH
14 YOU WHAT THE REQUIREMENTS ARE IN ORDER TO BECOME PERMANENT
15 STAFF?

16 A ON THAT SPECIFIC POINT?

17 Q ON ANY POINT.

18 A NO.

19 Q YOU HAVE BEEN THERE HOW MANY YEARS NOW?

20 A SEVEN.

21 Q AND YOU HAVE NO IDEA WHAT IT TAKES TO BECOME
22 PERMANENT STAFF WITH REGARD TO YOUR PERSONAL ASSETS?

23 A COULD YOU REPEAT THAT AGAIN, PLEASE?

24 Q DO YOU KNOW WITH REGARD TO YOUR PERSONAL ASSETS
25 WHAT THE CHURCH'S REQUIREMENTS ARE SHOULD YOU CHOOSE TO
26 BECOME PERMANENT STAFF?

27 A I DON'T BELIEVE I DO. I DON'T BELIEVE IT IS
28 CLEAR TO ME.

1 Q AND YOU HAVE ONLY BEEN THERE SEVEN YEARS?

2 A RIGHT.

3 Q YOU WORKED WITH MR. MULL FOR SOME SIX MONTHS?

4 A YES.

5 Q WHAT WAS IT THAT YOU ACTUALLY DID?

6 A DRAFTING WORK. ON THE -- MOST OF IT WAS ON THE
7 MONTESSORI INTERNATIONAL PROJECT.

8 Q MOST OF IT WAS ON THAT?

9 A YES. I HAD WORKED SOMEWHAT ON THE WILL OF GOD
10 FOCUS, ALSO.

11 Q WHAT ABOUT A 3,300 SEAT AUDITORIUM? DID YOU
12 EVER WORK ON THAT?

13 A NO.

14 Q DO YOU KNOW WHETHER MR. MULL WORKED ON IT?

15 A I CAN'T SAY FOR SURE, NO.

16 Q WHAT ABOUT THE GUARDHOUSE? DO YOU KNOW WHETHER
17 OR NOT MR. MULL EVER WORKED ON A GUARDHOUSE?

18 A YES.

19 Q SO HE WORKED ON THE GUARDHOUSE. WE KNOW HE
20 WORKED ON THE MONTESSORI SCHOOL. YOU DON'T KNOW WHETHER OR
21 NOT HE WORKED ON THE 3,300 SEAT AUDITORIUM?

22 A NO, I DON'T.

23 Q NOW YOU HAD AN OPPORTUNITY TO LOOK OVER THE
24 PLANS, DID YOU --

25 A UH-HUH.

26 Q -- THAT ARE HERE?

27 DO YOU KNOW OF YOUR OWN ACCORD WHETHER OR NOT
28 THERE ARE OTHER PLANS STILL ON THE PREMISES AT CHURCH

1 UNIVERSAL AND TRIUMPHANT THAT MAY HAVE BEEN CONTRIBUTED TO
2 BY MR. MULL?

3 A NO, I KNOW OF NONE.

4 Q HAVE YOU MADE A SEARCH FOR THEM?

5 A NO.

6 Q WELL, WOULD YOU BE THE PERSON WHO WOULD
7 ORDINARILY BE KEEPER OF THE ARCHIVES OF SUCH MATERIAL?

8 A NO, I WOULDN'T.

9 Q YOU TESTIFIED THAT YOU BECAME A STAFF MEMBER IN
10 1979; IS THAT CORRECT?

11 A THAT'S CORRECT.

12 Q WHEN DID YOU ACTUALLY JOIN THE CHURCH?

13 A APRIL OF 1979.

14 Q SO YOU --

15 A ON THE STAFF.

16 Q ON THE STAFF?

17 A RIGHT.

18 Q WERE YOU ASSOCIATED WITH THE CHURCH IN ANY
19 OTHER WAY PRIOR TO THAT DATE?

20 A YES. SINCE OCTOBER, 1979 -- EXCUSE ME, '78.

21 Q SINCE OCTOBER OF '78?

22 A RIGHT.

23 Q DID YOU ATTEND ANY CONFERENCES DURING, SAY, THE
24 YEAR 1978, THE YEAR 1977?

25 A '78, YES, I DID.

26 Q WOULD YOU HAVE ANY KNOWLEDGE WHATSOEVER AS TO
27 WHETHER OR NOT PLANS DRAWN BY MR. MULL WERE USED FOR FUND
28 RAISING IN ANY OF THE 1977 CONFERENCES?

1 A NO. I WASN'T IN THE ACTIVITY AT THAT POINT. I
2 COULDN'T SAY.

3 Q SO WHEN YOU TESTIFIED BEFORE THAT YOU HAD NO
4 KNOWLEDGE THAT MR. MULL'S PLANS WERE USED FOR FUND
5 RAISING --

6 A THAT WAS -- GO AHEAD. EXCUSE ME.

7 Q THAT WAS AFTER YOU BECAME A MEMBER OF THE
8 STAFF; IS THAT CORRECT?

9 A CORRECT.

10 Q OKAY. AFTER YOU STOPPED BEING A DRAFTSMAN WITH
11 MR. MULL, WERE YOU TRANSFERRED TO ANOTHER POSITION OR DID
12 YOU OBTAIN ANOTHER POSITION WITH THE CHURCH?

13 A YES.

14 Q AND WOULD YOU TELL US WHAT THAT WAS?

15 A I WORKED WITH THE STAFF INTERIOR DECORATOR.

16 Q YOU DID WHAT?

17 A I WORKED WITH THE STAFF INTERIOR DESIGNER.

18 Q AND WHAT WAS THERE FOR YOU TO DESIGN AT THAT
19 TIME FOR THE CHURCH?

20 A WELL, I -- BASICALLY WHAT I DID, I WAS AN
21 ASSISTANT TO HIM. I DIDN'T DO ANY DESIGNING WORK MYSELF.

22 Q WHAT EXACTLY DID YOU DO?

23 A I DID A LOT OF RESEARCH.

24 Q INTO WHAT?

25 A INTO INTERIOR FURNISHINGS.

26 Q WHEN YOU SAY YOU DID A LOT OF RESEARCH, DOES
27 THAT SAY YOU LOOKED AT PICTURES AND YOU READ BOOKS AND YOU
28 GOT IDEAS ABOUT --

1 A YES, RIGHT.

2 Q DO YOU HAVE ANYTHING TO DO WITH THE HONOR GUARD
3 AT CAMELOT?

4 A THE HONOR GUARD?

5 Q YES, THE HONOR GUARD.

6 A YES.

7 Q WHAT IS THE HONOR GUARD?

8 A IT IS THE OFFICE IN THE CHURCH, SPIRITUAL
9 OFFICE.

10 Q DOES THE HONOR GUARD HAVE ANYTHING TO DO WITH
11 SECURITY FOR ELIZABETH?

12 A YES.

13 Q NOW, DID YOU EVER WORK WITH A GENTLEMAN BY THE
14 NAME OF ALEXANDER REICHART?

15 A I DID.

16 Q DO YOU KNOW WHETHER OR NOT ANY OF THE PEOPLE AT
17 CAMELOT EVER TOOK ANY TRAINING IN ANY OF THE MARTIAL ARTS?

18 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
19 THE RELEVANCY, YOUR HONOR.

20 THE COURT: HE CAN ANSWER.

21 THE WITNESS: COULD YOU REPEAT THAT AGAIN?

22 Q BY MR. LEVY: YES. WHAT I WANT TO KNOW IS IF
23 ANY OF THE PEOPLE AT CAMELOT EVER TOOK ANY TRAINING IN THE
24 MARTIAL ARTS?

25 A YES.

26 Q DID YOU?

27 A YES.

28 Q WERE YOU PART OF THE SECURITY FORCE AT CAMELOT?

1 A YES.

2 Q WAS PART OF YOUR TASK AS PART OF THE HONOR
3 GUARD AND PART OF THE SECURITY FORCE THE SECURITY AND
4 PROTECTION AND -- OF ELIZABETH CLARE PROPHET?

5 A YES.

6 Q ABOUT HOW MANY PEOPLE ARE ON THAT SECURITY
7 FORCE?

8 A I COULDN'T SAY.

9 Q WHY COULDN'T YOU SAY?

10 A I DON'T KNOW.

11 Q WELL, WHILE YOU WERE ON IT, HOW MANY PEOPLE
12 WERE UP IN THE HILLS THERE TAKING JUDO TRAINING AND KARATE
13 TRAINING?

14 MR. KLEIN: I AM GOING TO OBJECT TO THE
15 CHARACTERIZATION, YOUR HONOR. THERE IS NO TESTIMONY OF
16 ANYBODY BEING UP IN THE HILLS TAKING KARATE TRAINING.

17 THE COURT: SUSTAINED.

18 MR. LEVY: I HAVE SEEN THE PICTURES, YOUR HONOR.
19 THEY ARE JUST LOADED WITH HILLS.

20 MR. KLEIN: WHY DON'T YOU TESTIFY.

21 THE COURT: GENTLEMEN. WE WILL GET TO THE PICTURES
22 AT A LATER TIME I ASSUME. PLEASE REPHRASE THE QUESTION.

23 Q BY MR. LEVY: WHERE DID YOU TRAIN IN THE
24 MARTIAL ARTS?

25 A ON THE PROPERTY AT CAMELOT.

26 Q WAS THE PROPERTY FLAT OR HILLY?

27 A FLAT.

28 Q ARE THERE ANY HILLS ADJACENT TO WHERE YOU

1 TRAINED?

2 A YES.

3 Q WOULD I BE ACCURATE IN CHARACTERIZING THE
4 PLACES WHERE YOU TRAINED AS SOMETIMES FLAT AND SOMETIMES
5 HILLY?

6 A NO.

7 Q JUST -- YOU JUST DID IT ON THE FLAT PLACES?

8 A RIGHT.

9 Q BECAUSE YOU NEVER HAD TO USE MARTIAL ARTS ON
10 THE HILLY PLACES?

11 A NO. I DON'T THINK THAT HAS ANYTHING TO DO WITH
12 IT.

13 Q WHILE YOU WERE AT CHURCH UNIVERSAL AFTER MR.
14 MULL LEFT, DID YOU EVER HAVE OCCASION TO HEAR OR READ THE
15 TWO AND A HALF HOUR MEETING THAT MR. MULL HAD WITH ELIZABETH
16 CLARE PROPHET AND EDWARD FRANCIS AND MONROE SHEARER?

17 A I HEARD THE TAPE.

18 Q WELL THEN, I WAS UNDER THE IMPRESSION YOU
19 TESTIFIED BEFORE THAT YOU DIDN'T HEAR ANYTHING ABOUT IT OR
20 THERE WAS NO DISCUSSION WITH REGARD TO GREGORY MULL AFTER HE
21 LEFT.

22 A I THOUGHT THAT WAS ON A PERSONAL BASIS.

23 Q OH, I SEE. WHAT ABOUT ON A NONPERSONAL BASIS?

24 A I HEARD A TAPE.

25 Q WHEN YOU HEARD IT, WERE YOU BY YOURSELF OR WERE
26 YOU WITH A GROUP OF PEOPLE?

27 A A GROUP OF PEOPLE.

28 Q AND HOW LARGE A GROUP?

1 A OH, MAYBE 150 PEOPLE.

2 Q DID THEY JUST PLAY THE TAPE OR DID THEY DO
3 SOMETHING ELSE BESIDE JUST PLAYING THE TAPE FOR THAT GROUP?

4 A NO. WE JUST HEARD THE TAPE.

5 Q WAS THERE ANY DISCUSSION OF THE CONTENTS OF THE
6 TAPE AFTER IT WAS PLAYED?

7 A I CAN'T REMEMBER. I CAN'T REMEMBER IF IT WAS,
8 WHAT WAS SAID.

9 Q DID YOU EVER DECREE AGAINST GREGORY MULL?

10 A NO.

11 Q DID YOU EVER DECREE?

12 A YES.

13 Q DO YOU EVER DECREE AGAINST SOMEBODY'S ENERGY?

14 A FORCES BEHIND PEOPLE.

15 Q FORCES BEHIND PEOPLE?

16 A YES.

17 Q I AM NOT FAMILIAR WITH YOUR PARTICULAR
18 RELIGIOUS BELIEFS, SIR, AND I DON'T MEAN TO DENIGRATE THEM,
19 BUT I DON'T KNOW WHAT "FORCES BEHIND PEOPLE" MEANS.

20 A WELL, WE DON'T DECREE AGAINST PEOPLE PER SE.

21 Q WHAT DOES THAT MEAN?

22 A WE DON'T DECREE -- WELL, AGAINST AN INDIVIDUAL.
23 WE DO NOT DECREE AGAINST AN INDIVIDUAL. MAYBE THE ENERGY
24 THAT IS BEHIND THE PERSON.

25 Q NOW, DOES THE ENERGY THAT -- LIKE WHAT IS
26 BEHIND ME, DOES THAT BELONG TO ME?

27 A WHAT DO YOU MEAN BY THAT?

28 Q WELL, I AM NOT SURE I UNDERSTAND WHAT YOU MEAN.

1 YOU SAID THE ENERGY BEHIND SOMEBODY. I AM GOING TO TURN
2 AROUND SLOWLY. MAYBE YOU CAN TELL ME WHETHER THERE IS
3 SOMETHING BACK BEHIND ME.

4 ARE YOU TALKING ABOUT SOMETHING THAT IS
5 PHYSICALLY BEHIND ME THAT YOU DECREE AGAINST?

6 A NO, NOT PHYSICALLY.

7 Q WELL, I AM TRYING TO UNDERSTAND IT. THE ENERGY
8 BEHIND SOMEONE. YOU MEAN THERE IS SOME KIND OF FORCE
9 OUTSIDE OF A PERSON THAT MAKES THEM DO SOMETHING?

10 A THERE COULD BE.

11 Q AND THAT IS WHAT YOU DECREE AGAINST, IT IS
12 THOSE UNSEEN THINGS THAT ARE BEHIND PEOPLE?

13 A YES.

14 Q BUT YOU DON'T DECREE AGAINST PEOPLE?

15 A NO.

16 Q IN THE COURSE OF YOUR ASSOCIATION WITH THE
17 CHURCH, HAVE YOU EVER HEARD THE PHRASE 10,000 YEARS OF OUTER
18 DARKNESS?

19 A POSSIBLY, BUT I COULDN'T SAY IN WHAT CONTEXT.

20 Q WHAT ABOUT YEARS OF REEMBODIMENT?

21 A I -- YEAH, I IMAGINE I HAVE HEARD THAT, BUT I
22 DON'T KNOW IN WHAT CONTEXT YOU ARE REFERRING TO.

23 Q WHY DON'T YOU TELL ME ABOUT A CONTEXT THAT YOU
24 UNDERSTAND THAT THOSE TERMS MIGHT BE USED WITHIN THE
25 STRUCTURE OF YOUR CHURCH?

26 A I DON'T REALLY THINK I COULD BECAUSE I DON'T
27 UNDERSTAND WHAT YOUR QUESTION IS, WHAT YOU ARE TRYING TO GET
28 AT.

1 Q ALL I AM TRYING TO FIND OUT IS IN WHAT CONTEXT
2 SOMEONE IN YOUR CHURCH MIGHT USE THE TERM 10,000 YEARS OF
3 OUTER DARKNESS.

4 A I DON'T KNOW.

5 Q HAVE YOU EVER HEARD THE TERM USED IN YOUR SEVEN
6 YEARS WITH THE CHURCH?

7 A NOT IN A SPECIFIC INSTANCE THAT I CAN
8 CHARACTERIZE AT THIS POINT.

9 Q YOU MEAN IT MIGHT JUST COME UP LIKE RAMS LOST
10 THE FOOTBALL GAME AND THEN SOMEBODY WOULD SAY 10,000 YEARS
11 OF OUTER DARKNESS?

12 A NO, I DON'T THINK SO.

13 Q WHAT I AM ASKING FOR IS SOME KIND OF SPECIFIC
14 INSTANCE THAT YOU MIGHT TELL US ABOUT IN THE NORMAL COURSE
15 OF AFFAIRS AT THE CHURCH WHEN THAT PHRASE MIGHT BE USED.

16 A I -- I CAN'T TELL YOU.

17 Q NEVER?

18 A NO.

19 Q DID YOU EVER ATTEND SUMMIT UNIVERSITY?

20 A YES.

21 Q WHAT DID THEY TEACH YOU THERE?

22 A WHAT DID THEY TEACH US THERE?

23 Q YES.

24 A THE TEACHINGS OF THE MASTERS ARE BASICALLY WHAT
25 IS GIVEN TO US THERE. AND IT IS AN INTEGRATION WITH YOUR
26 CHRIST SELF, YOUR I AM PRESENCE, WHICH IS YOUR GOD PRESENCE.
27 AND IT IS A TEACHING THAT HELPS YOU INTEGRATE THE TEACHINGS
28 OF THE EAST AND THE WEST FROM THE DIFFERENT MASTERS AND

1 DIFFERENT ASPECTS FROM ALL DIFFERENT RELIGIONS.

2 Q IN THE COURSE OF THE TEACHINGS AT SUMMIT
3 UNIVERSITY, DID YOU EVER HEAR THE PHRASE 10,000 YEARS OF
4 OUTER DARKNESS?

5 A NOT THAT I RECALL.

6 Q WHAT ABOUT YEARS AND YEARS OF REEMBODIMENT?

7 A NOT THAT I CAN RECALL.

8 Q WHAT ABOUT THE TERM THE BEAST OF BLASPHEMY?
9 HAVE YOU EVER HEARD THAT ONE?

10 A YES.

11 Q WOULD YOU TELL US THE CONTEXT IN WHICH YOU
12 HEARD THAT?

13 A I DON'T — I COULDN'T SAY WHAT IT MEANS, SO I
14 REALLY DON'T KNOW IN WHAT CONTEXT IT WOULD BE USED.

15 Q YOU HAVE BEEN ASSOCIATED WITH THE ORGANIZATION
16 FOR SEVEN YEARS AND AT THIS POINT YOU REALLY DON'T KNOW TOO
17 MUCH ABOUT THE RELIGIOUS PHILOSOPHY OR BELIEFS?

18 A THAT PARTICULAR TERM.

19 Q DID YOU EVER HEAR ELIZABETH CLARE PROPHET USE
20 THAT TERM IN REGARD TO GREGORY MULL?

21 A NO.

22 Q DID YOU EVER DO A DECREE AGAINST PERSONAL AND
23 IMPERSONAL HATRED?

24 A NO.

25 Q DO YOU DECREE REGULARLY?

26 A YES.

27 Q HAVE YOU EVER HEARD OF THAT DECREE?

28 A NO.

1 Q ARE PERMANENT STAFF OR STAFF MEMBERS SOMETIMES
2 EXCUSED FROM CERTAIN -- DOING CERTAIN DECREES?

3 A EXCUSED FROM THEM? IN WHAT --

4 Q WELL, YOU DON'T HAVE TO DO THEM IS WHAT I MEAN
5 BY EXCUSED FROM THEM.

6 A FOR WHAT REASONS? SOMETIMES THERE IS WORK THAT
7 HAS TO GO ON WHEN THERE IS A PRAYER OF VIGIL HELD THAT IS
8 MORE IMPORTANT PERHAPS THAN PERHAPS YOUR DECREERING.

9 Q THAT IS WHAT I MEAN BY BEING EXCUSED. IF YOU
10 HAD SOMETHING THAT WAS MORE IMPORTANT, MIGHT YOU THEN MISS A
11 DECREERING SESSION?

12 A YES.

13 Q AT ANY OF THE DECREERING SESSIONS -- AND I AM
14 SHOWING YOU WHAT HAS BEEN MARKED AS EVIDENCE NUMBER 107.
15 WOULD YOU BE KIND ENOUGH TO GLANCE THROUGH THAT.

16 A UH-HUH. 107. THERE IS MORE THAN ONE HERE.

17 Q ARE YOU FAMILIAR WITH THIS DECREE? THE 107
18 JUST REFERS TO THE ITEM OF EVIDENCE. THERE IS SOME SIX
19 PAGES HERE.

20 A RIGHT.

21 Q ARE YOU FAMILIAR WITH THAT DECREE?

22 A I'VE SEEN IT BEFORE.

23 Q ON THE VERY LAST PAGE, THERE IS A PLACE HERE
24 AND IT IS A BLANK LINE?

25 A UH-HUH.

26 Q WHAT DO YOU PUT IN THE BLANK LINES?

27 A USUALLY IT IS PLANETARY SITUATIONS THAT NEED
28 ATTENTION, YOU KNOW. BE IT THE FORCES OF WORLD COMMUNISM OR

1 ABORTION, THAT KIND OF THING.

2 Q YOU EVER PUT PEOPLE'S NAMES IN THOSE BLANK
3 SPACES?

4 A NO.

5 Q IN READING THROUGH THIS THING, I SEE THAT IT
6 COVERS JUST ABOUT EVERYTHING. IT COVERS WORLD SITUATIONS,
7 AND JUNK FOOD, AND BLACK MAGICIANS AND WITCHES AND SATAN AND
8 EVERYBODY ELSE.

9 CAN YOU TELL ME THE REASON WHY -- WITH THIS
10 SIX-PAGE DOCUMENT, IT COVERS JUST ABOUT EVERYTHING -- WHY
11 THEY'D LEAVE A LITTLE SPACE OUT DOWN HERE? THEY HAVE
12 COVERED JUST ABOUT FROM A TO Z.

13 TO YOUR KNOWLEDGE, THE BLANK SPACE, IS ANYONE'S
14 NAME EVER INSERTED IN THE BLANK SPACE?

15 A NO.

16 Q JUST WORLD SITUATIONS?

17 A YES.

18 Q YOU MIGHT BE JUST ZIPPING ALONG THROUGH THIS
19 THING, AND THEN ALL OF A SUDDEN WHERE IT SAYS, "THE CLOCK OF
20 BETRAYERS, FUNDAMENTALISTS, AND LAGGARDS AND FALLEN ONES,"
21 BLANK, "AND ALL INDIVIDUALS INFLUENCED BY THEM" --

22 A UH-HUH.

23 Q -- YOU'D STICK IN THERE JUNK FOOD OR
24 COMMUNISTS?

25 A YES. YOU COULD.

26 Q SURE YOU COULD.

27 A COMMUNISTS FOR SURE. JUNK FOOD DOESN'T REALLY
28 FALL IN LINE WITH THAT.

1 Q NO. THAT IS COVERED OVER HERE ON PAGE TWO.
2 DID YOU EVER HEAR ELIZABETH CLARE PROPHET REFER
3 TO GREGORY MULL AS THE BEAST OF BLASPHEMY AND THE SERPENT?

4 A NO.

5 Q DO YOU ATTEND DECREEING SESSIONS REGULARLY?

6 A YES.

7 Q IF I TOLD YOU MISS PROPHET TOLD US WHEN SHE
8 LOOKED AT THAT DECREE THAT PEOPLE'S NAMES DID GET PUT IN
9 THERE, WOULD YOU STILL HAVE THE SAME OPINION AND HAVE AN
10 OPINION DIFFERENT FROM MRS. PROPHET?

11 A YES.

12 Q SHE THE SPIRITUAL LEADER OF THE CHURCH?

13 A YES.

14 Q SHE THE HEAD OF THE CHURCH?

15 A YES.

16 Q ARE YOU SUGGESTING THAT YOUR KNOWLEDGE OF
17 PRACTICES AT THE CHURCH IS GREATER THAN HER KNOWLEDGE?

18 A NO.

19 Q BUT YOU HAVE A DIFFERENT OPINION AS TO WHAT
20 GOES IN AN INSERT LIKE THAT?

21 A YES.

22 Q THE CLOCK OF BETRAYAL, ARE YOU FAMILIAR WITH
23 THE TERM?

24 A YES.

25 Q DO YOU WANT TO TELL US WHAT IT IS?

26 A IT IS A CERTAIN GROUP OF INDIVIDUALS THAT
27 USUALLY HAVE LEFT DISGRUNTLEY AND HAVE TURNED AGAINST THE
28 CHURCH WITH THEIR VENDETTAS.

1 Q MR. MULL ON THAT CLOCK?

2 A I COULDN'T SAY.

3 Q YOU EVER SEEN THE CLOCK?

4 A SEEN IT?

5 Q YES. IS IT A PHYSICAL MANIFESTATION, SOMETHING
6 LIKE THAT CLOCK? CAN YOU SEE IT?

7 A NO.

8 Q IT IS JUST SOMETHING YOU TALK ABOUT?

9 A YES. IT IS A GROUP OF INDIVIDUALS.

10 Q ARE THERE A LOT OF PEOPLE THAT BETRAY THE
11 CHURCH?

12 A I COULDN'T SAY BECAUSE I HAVE NEVER SEEN AN
13 EXTENSIVE LIST.

14 Q IS THERE AN EXTENSIVE LIST?

15 A I DON'T KNOW IF THERE IS OR NOT. I HAVE NEVER
16 SEEN ANYTHING.

17 Q SINCE YOU ARE A STAFF MEMBER AND YOU HAVE
18 WORKED FOR SEVEN YEARS AND YOU ARE STILL WORKING AT THE
19 CHURCH AND YOU ARE ON THE HONOR GUARD, DO YOU KNOW OF
20 ANYBODY BESIDE GREGORY MULL WHO IS ON THAT CLOCK OF
21 BETRAYAL?

22 MR. KLEIN: I WOULD OBJECT, YOUR HONOR. THERE HAS
23 BEEN NO TESTIMONY THAT GREGORY MULL IS ON IT. IT
24 MISCHARACTERIZES THE TESTIMONY.

25 THE COURT: SUSTAINED.

26 Q BY MR. LEVY: TO YOUR KNOWLEDGE, IS MR. GREGORY
27 MULL INCLUDED IN THE LIST ON THE CLOCK OF BETRAYAL?

28 A I DON'T KNOW.

1 Q WHAT DO YOU ACTUALLY DO RIGHT NOW AT THE
2 CHURCH?

3 A I WORK FOR -- IN THE ENGINEERING AND PLANNING
4 DEPARTMENT AT THE ROYAL TETON RANCH.

5 Q SO YOU REALLY DON'T KNOW WHAT GOES ON DOWN HERE
6 LOCALLY?

7 A NO.

8 Q HOW LONG HAVE YOU BEEN WORKING UP AT THE ROYAL
9 TETON RANCH?

10 A ABOUT THREE YEARS.

11 Q YOU WERE AT CAMELOT WHEN MR. MULL WAS THERE?

12 A THAT'S CORRECT.

13 Q WHEN HE WAS DOING ARCHITECTURAL WORK THERE, YOU
14 TESTIFIED YOU WERE WORKING WITH HIM?

15 A YES.

16 Q WAS ANYBODY ELSE WORKING WITH HIM?

17 A YES.

18 Q WHO?

19 A LUCINDA MACY, DONALD ANTHONY FUCCI, I BELIEVE
20 THAT WAS IT.

21 Q DID EVERYBODY WORK IN THE SAME ROOM?

22 A NO.

23 Q HOW MANY PEOPLE DID?

24 A LET'S SEE. DONALD SOMETIMES WORKED WITH ME IN
25 MY OFFICE.

26 Q NOW LET'S KEEP IT TO GREGORY'S ROOM.

27 DID YOU EVER WORK IN GREGORY'S ROOM WHILE
28 GREGORY WAS WORKING THERE?

1 A YES.

2 Q WHILE YOU AND HE WERE WORKING THERE, DID ANYONE
3 ELSE EVER WORK IN THAT ROOM?

4 A YES. WE'D HAVE CONFERENCES TOGETHER.

5 Q SO IN THAT HUGE TEN AND A HALF BY ELEVEN AND A
6 HALF ROOM, YOU MIGHT HAVE HAD THREE PEOPLE IN THERE
7 CONFERRING AND WORKING?

8 A SURE.

9 Q THAT WAS ALSO THE ROOM WHERE HE SLEPT?

10 A YES.

11 Q HAD THAT NIFTY LITTLE BED RIGHT UNDER THE
12 DRAFTING BOARD?

13 A NO, IT WASN'T UNDER THE DRAFTING BOARD. IT WAS
14 UNDER A LAYOUT TABLE THAT HE HAD ON THE SIDE OF HIS DRAFTING
15 BOARD. IT WAS LIKE AN EIGHT FOOT TABLE THAT HE HAD ELEVATED
16 ABOVE HIS BED.

17 Q AND HE SLEPT RIGHT UNDER THERE SO --

18 A YES, HE DID.

19 Q THERE IS A FEW OTHER PROJECTS I AM CURIOUS
20 ABOUT. WHEN GREGORY MULL AND YOU IN '79 AND '80 WERE
21 WORKING ON ARCHITECTURAL PROJECTS, YOU'VE TOLD US ABOUT THE
22 MONTESSORI INTERNATIONAL SCHOOL.

23 WORK ON THAT PROJECT TOGETHER?

24 A YES.

25 Q DID HE DO WORK ON THE ADMINISTRATION BUILDING
26 THERE?

27 A NOT TO MY KNOWLEDGE.

28 Q WHAT ABOUT THE STUDENT UNION BUILDING THERE?

1 A NO.

2 Q THE OFFICE TOWER?

3 A NO.

4 Q HOUSING FACILITIES?

5 A NO. THE ONLY PROJECTS THAT WE WORKED ON WAS
6 MONTESSORI INTERNATIONAL OUT OF THE MASTER PLAN, TEN-YEAR
7 MASTER PLAN FOR CAMELOT.

8 Q THE TEN-YEAR MASTER PLAN, JUST A QUESTION OR
9 TWO ABOUT THAT.

10 WHAT WAS THE TEN-YEAR MASTER PLAN?

11 A IT WAS A PLAN FOR THE DEVELOPMENT OF CAMELOT,
12 DEVELOPMENT OF OUR COMMUNITY THERE.

13 Q HAS THE COMMUNITY BEEN DEVELOPED?

14 A NO.

15 Q SINCE YOU'VE BEEN WITH THE CHURCH, HAVE THERE
16 BEEN FUND RAISING DRIVES FOR THE DEVELOPMENT OF THE
17 COMMUNITY?

18 A FOR THE ROYAL TETON RANCH.

19 Q WITH REGARD TO CAMELOT, HAS THERE BEEN ANY FUND
20 RAISING DONE WITH REGARD TO CAMELOT?

21 A I COULDN'T SAY FOR SURE IF THERE HAS OR NOT.

22 Q AND THE FUNDS THAT ARE BEING RAISED FOR THE
23 ROYAL TETON RANCH --

24 A YES.

25 Q -- WHAT ARE THOSE FUNDS BEING UTILIZED FOR?

26 A FOR THE DEVELOPMENT ON IT, FOR AGRICULTURAL
27 DEVELOPMENT AS WELL AS FOR, YOU KNOW, THE REST OF THE PLAN
28 THAT WE HAVE UP THERE.

1 Q THE REST OF THE WHAT?

2 A THE REST OF THE PLAN THAT WE HAVE.

3 Q COULD YOU TELL US BRIEFLY WHAT THE REST OF THE
4 PLAN IS?

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

7 THE COURT: OVERRULED.

8 YOU CAN ANSWER.

9 THE WITNESS: PARDON ME?

10 THE COURT: YOU CAN ANSWER.

11 THE WITNESS: OKAY. THE REST OF THE PLAN? IT IS
12 TO --

13 THE COURT: SIT FORWARD SO WE CAN HEAR YOU.

14 THE WITNESS: OKAY.

15 THE COURT: THANK YOU.

16 THE WITNESS: YOU ARE WELCOME.

17 THE -- WE ARE PLANNING ON DEVELOPING THE ROYAL
18 TETON RANCH TO BE EVENTUALLY OUR CENTER FOR THE CHURCH.

19 Q BY MR. LEVY: AND WHAT DOES THE PLAN INCLUDE?
20 THE STUFF THAT IS IN THAT BOOKLET, ARE YOU GOING TO DO THAT
21 UP THERE?

22 A I DON'T KNOW THAT, ALL THE SPECIFICS.

23 Q SINCE YOU ARE ONE OF THE DRAFTSMAN WHO
24 SOMETIMES WORKED FOR THE CHURCH, YOU HAVE GOT A BACKGROUND
25 IN DRAFTING.

26 DO YOU HAVE ANY KNOWLEDGE OF ANY PLAN
27 WHATSOEVER FOR THE DEVELOPMENT OF THE ROYAL TETON RANCH?

28 A YES. TO A CERTAIN EXTENT. PRIMARILY NOW WE

1 ARE DEVELOPING THE AGRICULTURAL ASPECT OF IT, THE IRRIGATION
2 SYSTEMS, RECLAIMING LAND, FARMING, THAT KIND OF THING.

3 Q ARE YOU GOING TO DO ANY CONSTRUCTION LIKE THAT
4 TEN-YEAR PLAN SUGGESTS MIGHT HAVE BEEN DONE AT CAMELOT?

5 A I COULDN'T SAY FOR SURE IF IT IS GOING TO
6 FOLLOW THIS PLAN.

7 Q HAS THERE BEEN ANY DISCUSSION THAT YOU ARE
8 AWARE OF THAT THEY ARE GOING TO DO ANYTHING OTHER THAN GROW
9 COTTON AND TOTE THAT BALE UP THERE?

10 A YES. EVENTUALLY WE ARE GOING TO BE
11 HEADQUARTERED THERE.

12 Q WHEN YOU ARE HEADQUARTERED THERE, TO YOUR
13 KNOWLEDGE, HAS THERE BEEN ANY KNOWLEDGE AS TO WHAT MIGHT BE
14 CONSTRUCTED THERE?

15 A YES. A CHAPEL BUILDING TO HOLD OUR SERVICES,
16 HOUSING FOR THE STAFF, THAT KIND OF THING. BASICALLY WHAT
17 WE HAVE AT CAMELOT NOW.

18 Q IN THE COURSE OF YOUR ASSOCIATION WITH THE
19 CHURCH AND YOUR WORK WITH THE CHURCH, HAS THERE EVER BEEN A
20 TIME WHEN, AS PART OF YOUR DUTIES, YOU WERE OBLIGATED TO
21 TRANSPORT GOLD OR WEAPONS TO MOUNTAIN FACILITIES BELONGING
22 TO THE CHURCH?

23 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AS TO
24 RELEVANCY AND CITE EVIDENCE CODE 352 AS WELL AS EVIDENCE
25 CODE 787.

26 THE COURT: SUSTAINED.

27 Q BY MR. LEVY: DID YOU EVER MOVE CHURCH PROPERTY
28 AROUND?

1 A CHURCH PROPERTY?

2 Q YES.

3 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
4 AMBIGUOUS, YOUR HONOR.

5 THE COURT: CAN YOU ANSWER THE QUESTION?

6 THE WITNESS: WHAT DO YOU MEAN BY "CHURCH PROPERTY"?

7 THE COURT: WHY DON'T YOU REPHRASE IT.

8 Q BY MR. LEVY: DO YOU KNOW WHETHER OR NOT THE
9 CHURCH HAS CACHES OF GUNS AND/OR GOLD?

10 A NO.

11 Q IN THE COURSE OF YOUR TRAINING, WERE YOU ALSO
12 TRAINED IN THE USE OF WEAPONS?

13 A NO.

14 Q JUST KARATE?

15 A YES.

16 Q HAVE GUARD DOGS OUT AT THE CHURCH?

17 A NO.

18 Q DIDN'T YOUR ASSOCIATE, MR. REICHART, AT ONE
19 TIME HAVE A DOG OUT THERE THAT YOU WERE INTERESTED IN THE
20 CRUSHING POWER OF THE JAWS OF THE DOG? YOU KNOW WHICH DOG I
21 AM TALKING ABOUT?

22 A NO.

23 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCY
24 OF THIS LINE OF QUESTIONING, YOUR HONOR.

25 THE COURT: OVERRULED.

26 Q BY MR. LEVY: DOES THE NAME JOB RING A BELL
27 ABOUT THAT DOG?

28 A YEAH, I KNOW WHO YOU ARE TALKING ABOUT. JOB.

1 Q IS THAT ALEX REICHART'S DOG?

2 A ALEX REICHART'S DOG?

3 Q YES.

4 A NO.

5 Q IS -- DOES IT BELONG TO THE CHURCH OR TO
6 ELIZABETH?

7 A YES. IT BELONGS TO THE CHURCH.

8 Q MY QUESTION TO YOU IS DO YOU HAVE GUARD DOGS
9 OUT THERE GUARDING THE CHURCH?

10 A I WOULDN'T CALL JOB A GUARD DOG. HE IS MORE OF
11 A PET.

12 Q WHAT KIND OF DOG IS HE?

13 A A BOUVIER.

14 Q THAT SOUNDS LIKE JACQUELINE KENNEDY. WHAT IS A
15 BOUVIER?

16 A THAT IS ALL I COULD TELL YOU ABOUT IT.

17 Q LITTLE BITTY DOG?

18 A NO. HE IS PRETTY BIG, PRETTY GOOD SIZE.

19 Q HOW BIG IS "PRETTY BIG"?

20 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THE
21 RELEVANCY OF THIS LINE OF QUESTIONING.

22 THE COURT: OVERRULED.

23 ABOUT HOW LARGE IS IT?

24 THE WITNESS: HE STANDS ABOUT TWO AND A HALF FEET
25 HIGH.

26 THE COURT: TO THE SHOULDERS?

27 THE WITNESS: YES.

28 THE COURT: ABOUT AS TALL AS A --

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THE WITNESS: LIKE A GERMAN SHEPHERD OR BOXER.

THE COURT: ALL RIGHT.

Q BY MR. LEVY: IS THAT THE ONLY GUARD DOG YOU HAVE OUT AT THE CHURCH?

MR. KLEIN: I AM GOING TO OBJECT. THERE WAS NO TESTIMONY THAT THAT WAS A GUARD DOG, YOUR HONOR. MISCHARACTERIZES.

THE COURT: SUSTAINED.

Q BY MR. LEVY: HAVE ANY OTHER DOGS OUT THERE?

A YES. WE HAVE A LOT OF CATTLE DOGS THAT HERD THE — HELP HERD THE CATTLE AND WE HAVE SHEEPDOGS ALSO THAT HELP HERD THE SHEEP.

Q YOU HERD SHEEP DOWN AT CAMELOT, DO YOU?

A NO. THIS IS AT THE ROYAL TETON RANCH.

Q LET'S CONFINE IT TO CAMELOT. WHEN YOU WERE AT CAMELOT, WAS JOB DOWN AT CAMELOT?

A YES. THERE WAS ALSO A SHEEPDOG THERE, TOO.

Q MR. REICHART — PARDON ME, MR. BRIGHT. I DIDN'T MEAN TO INTERCHANGE IT THERE LIKE THAT.

MR. KLEIN HAS USED THE TERM "ROBOTS." THERE IS NO ROBOTS OUT AT CAMELOT TO YOUR RECOLLECTION, IS THERE?

A NO.

Q PEOPLE DON'T DO AND SAY THE SAME THING, DO THEY?

A PARDON ME?

Q I SAID PEOPLE OUT THERE DON'T DO AND SAY THE SAME THING, DO THEY?

A I DON'T UNDERSTAND WHAT YOU MEAN BY THAT.

1 Q WELL, MR. KLEIN SAYS THAT SOMEBODY HAD USED THE
2 WORD "ROBOT" AT CAMELOT, AND I RECALL HIM ASKING YOU WHETHER
3 THERE WERE ANY ROBOTS OUT THERE AND YOU SAID, "NO."

4 A RIGHT.

5 Q IS THAT CORRECT?

6 A THAT'S CORRECT.

7 Q WHAT I AM ASKING YOU IS IS THAT THE PEOPLE OUT
8 THERE, THEY DON'T DO AND SAY THE SAME THING, DO THEY?

9 MR. KLEIN: I AM GOING TO OBJECT --

10 THE WITNESS: I DON'T KNOW WHAT YOU MEAN BY THAT, "DO
11 AND SAY THE SAME THING." YOU HAVE TO BE MORE SPECIFIC.

12 Q BY MR. LEVY: WELL, ROBOTS DO SOMEWHAT A
13 SIMILAR THING, DO THEY NOT?

14 A YES.

15 Q AND THE PEOPLE AT CAMELOT DO NOT ACT LIKE
16 ROBOTS, DO THEY?

17 A NO.

18 Q CAN YOU EXPLAIN TO ME THEN THE DRESS CODES AND
19 THE COLOR CODES? DO ALL THE PEOPLE OUT THERE FOLLOW
20 ELIZABETH'S RECOMMENDATION WITH REGARD TO DRESS CODES AND
21 COLOR CODES?

22 A NO.

23 Q SO WHAT YOU ARE SAYING IS THAT SOME PEOPLE --

24 A THEY HAVE THEIR OWN FREE WILL.

25 Q THEY BREAK THE RULES?

26 A NO. THERE IS NO RULES TO BREAK. PEOPLE HAVE
27 THEIR OWN FREE WILL AS TO HOW HE OR SHE CHOOSES TO DRESS,
28 WHAT COLORS THEY CHOOSE TO WEAR.

1 Q SINCE YOU HAVE BEEN A MEMBER OF THE CHURCH, WAS
2 THERE A TIME THAT ELIZABETH CAME OUT WITH A LINE OF FASHION
3 CLOTHES, GURU MA CLOTHES?

4 A YES.

5 Q AND THEY WERE SOLD TO THE MEMBERS SO THE
6 MEMBERS WOULD HAVE A SIMILAR ATTIRE, WERE THEY NOT?

7 A THEY WERE SOLD TO THE MEMBERS. I COULDN'T SAY
8 WHAT THE REASONING BEHIND IT WAS.

9 Q DID YOU HAVE ANYTHING TO DO WITH THE INITIAL
10 CONVERSATIONS WHERE IT WAS DETERMINED TO ASK MR. MULL TO
11 COME TO CAMELOT?

12 A NO.

13 Q AS YOU SIT HERE NOW, DO YOU KNOW THE TERMS AND
14 CONDITIONS UNDER WHICH MR. MULL WAS ASKED TO COME TO
15 CAMELOT?

16 A NO. ONLY TO COME TO WORK IN THE CAPACITY OF A
17 BUILDING DESIGNER. BUT I DON'T KNOW ANYMORE SPECIFIC THAN
18 THAT.

19 MR. LEVY: THANK YOU VERY MUCH, MR. BRIGHT.

20 I HAVE NOTHING FURTHER.

21 THE COURT: HOW MUCH TIME DO YOU NEED?

22 MR. KLEIN: JUST A FEW MINUTES, YOUR HONOR. I THINK
23 I CAN BE DONE WITHIN --

24 THE COURT: THAT IS VAGUE AND AMBIGUOUS. HOW MUCH
25 TIME DO YOU NEED?

26 MR. KLEIN: FIVE MINUTES.

27 THE COURT: ALL RIGHT.

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REDIRECT EXAMINATION +

BY MR. KLEIN:

Q WHEN MR. MULL LEFT CAMELOT, WAS THE MONTESSORI PROJECT DONE AS FAR AS THE ARCHITECTURAL WORK?

A NO.

Q WERE ALL -- WHERE WAS YOUR OFFICE LOCATED IN RELATION TO WHERE MR. MULL'S OFFICE WAS?

A RIGHT ADJACENT TO HIM, NEXT DOOR.

Q YOU WERE AWARE OF ALL THE PROJECTS ON WHICH MR. MULL WAS WORKING WHEN HE WAS AT CAMELOT WHERE HE SPENT ANY KIND OF SUBSTANTIAL TIME ON IT?

A YES.

MR. LEVY: OBJECTION, YOUR HONOR. VAGUE AND AMBIGUOUS. WHAT IS "SUBSTANTIAL TIME"?

THE COURT: SUSTAINED. LAST ANSWER OF THE WITNESS IS STRICKEN.

Q BY MR. KLEIN: YOU ARE AWARE OF THE PROJECTS ON WHICH MR. MULL WAS WORKING WHEN HE WAS AT CAMELOT?

A YES.

Q YOU DISCUSSED THEM WITH HIM?

A YES.

Q AS FAR AS THIS MARTIAL ARTS TRAINING, WHAT EXACTLY WAS THE TRAINING? WHAT AREA, JUDO, KARATE?

A IT WAS A MARTIAL ART FORM CALLED TUNG SOO DOO.

Q HOW MANY CLASSES DID YOU ATTEND?

A OH, GOODNESS. MAYBE ONCE, MAYBE TWICE A WEEK FOR THAT PERIOD OF A YEAR OR SO.

Q DID YOU EVER CARRY A WEAPON?

1 A NO.

2 Q WHEN YOU SAID YOU WERE ON SECURITY FOR
3 ELIZABETH CLARE PROPHET, TO YOUR KNOWLEDGE WERE THREATS ON
4 HER LIFE EVER RECEIVED?

5 MR. LEVY: I AM GOING TO OBJECT TO THAT CALLS FOR A
6 CONCLUSION.

7 THE COURT: SUSTAINED.

8 MR. KLEIN: THANK YOU.

9 I HAVE NO FURTHER QUESTIONS.

10

11 RE-CROSS-EXAMINATION +

12 BY MR. LEVY:

13 Q JUST ONE QUESTION, MR. BRIGHT.

14 YOU'VE TOLD US WHAT PROJECTS YOU WORKED WITH
15 WITH MR. MULL. WERE YOU THE INDIVIDUAL WHO INSTRUCTED MR.
16 MULL WHAT HE WAS SUPPOSED TO WORK ON?

17 A NO.

18 Q DO YOU KNOW WHO THAT INDIVIDUAL WAS?

19 A HE WORKED WITH A BOARD AT THE TIME. THE BOARD
20 OF DIRECTORS, THAT WAS A COMMITTEE, SO I COULDN'T SAY
21 SPECIFICALLY. THEY WORKED AS A GROUP AND DESIGNATED THEIR
22 WORK TO HIM.

23 Q SO IF I UNDERSTAND CORRECTLY, THE BOARD OF
24 DIRECTORS TOLD MR. MULL WHAT TO DO?

25 A YES.

26 Q BUT YOU DIDN'T -- YOU DID WHAT MR. MULL TOLD
27 YOU TO DO?

28 A YES.

1 MR. LEVY: NOTHING FURTHER.

2 MR. KLEIN: NOTHING FURTHER, YOUR HONOR.

3 THE COURT: ALL RIGHT. YOU ARE EXCUSED.

4 WE WILL RESUME TOMORROW MORNING AT 9:15.

5 EVERYBODY HAVE A PLEASANT EVENING. SEE YOU TOMORROW MORNING
6 AT 9:15.

7 (AT 4:15 P.M., AN ADJOURNMENT WAS TAKEN
8 UNTIL WEDNESDAY, MARCH 5, 1986, AT
9 9:15 A.M.)

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