

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,
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-AND-

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COPY

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KATHLEEN H. ADAMS, CSR #2853
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ERMA DE MAR, CSR #2117
OFFICIAL REPORTERS

1 LOS ANGELES, CALIFORNIA; WEDNESDAY, MARCH 5, 1986 *

2 9:35 A.M.

3 DEPARTMENT 50 HON. ALFRED L. MARGOLIS, JUDGE
4 (APPEARANCES AS HERETOFORE NOTED.)
5

6 THE COURT: GOOD MORNING, EVERYBODY.

7 PLEASE PROCEED.

8 MR. KLEIN: THANK YOU, YOUR HONOR.
9

10 JANE FLEMING, +

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

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

15 THE WITNESS: JANE FLEMING. J-A-N-E, F-L-E-M-I-N-G.

16 THE CLERK: THANK YOU.

17 THE WITNESS: YOU ARE WELCOME.
18

19 DIRECT EXAMINATION +

20 BY MR. KLEIN:

21 Q WHAT IS YOUR EDUCATIONAL BACKGROUND?

22 A I HAVE A BACHELOR OF ARTS DEGREE FROM THE
23 UNIVERSITY OF DENVER WHERE I ALSO ACQUIRED TEN CREDITS
24 TOWARDS MY MASTER'S ALSO IN THEATER.

25 Q ARE YOU CURRENTLY EMPLOYED?

26 A YES, I AM.

27 Q WHERE DO YOU WORK?

28 A AT SIZZLER.

1 Q DO YOU HAVE ANY PART-TIME JOBS AT THIS TIME OR
2 PART-TIME CAREER AT THIS TIME?

3 A YES, I DO. I AM ALSO PURSUING AN ACTING
4 CAREER.

5 Q ARE YOU MARRIED?

6 A NO.

7 Q DO YOU HAVE ANY CHILDREN?

8 A YES, I DO. I HAVE ONE CHILD.

9 Q ARE YOU CURRENTLY AFFILIATED WITH CHURCH
10 UNIVERSAL AND TRIUMPHANT IN ANY WAY?

11 A NO.

12 Q WAS THERE A TIME WHEN YOU WERE AFFILIATED WITH
13 CHURCH UNIVERSAL?

14 A YES, THERE WAS.

15 Q WHEN DID YOU FIRST BECOME AFFILIATED WITH THE
16 CHURCH?

17 A JANUARY OF 1975.

18 Q AND AT THAT TIME DID YOU ATTEND SUMMIT
19 UNIVERSITY?

20 A JANUARY THROUGH MARCH.

21 Q JANUARY THROUGH MARCH, 1975?

22 A UH-HUH.

23 Q AFTER LEAVING SUMMIT UNIVERSITY, DID YOU REMAIN
24 AFFILIATED WITH THE CHURCH IN ANY WAY?

25 A YES, I DID.

26 Q WHAT WAS THE NATURE OF THAT AFFILIATION?

27 A I WAS A CHURCH MEMBER.

28 Q AND DID THERE COME A TIME WHEN YOU NO LONGER

1 WERE AFFILIATED WITH THE CHURCH?

2 A YES.

3 Q APPROXIMATELY WHEN WAS THAT?

4 A FOUR TO FIVE YEARS AGO.

5 Q THAT WOULD BE EARLY 1980'S?

6 A OR LATE '79.

7 Q WAS THERE ANY PARTICULAR REASON --

8 A IT IS HARD TO PINPOINT IT BECAUSE IT WAS VERY
9 GRADUAL. IT WASN'T ANYTHING SUDDEN.

10 Q WAS THERE ANY PARTICULAR REASON THAT YOU
11 EVENTUALLY CEASED BEING AFFILIATED WITH THE CHURCH?

12 A WELL, I GUESS IF IT REALLY COMES DOWN TO IT, IT
13 IS PROBABLY TIME.

14 Q WHAT DO YOU MEAN BY THAT?

15 A WELL, THERE ARE A LOT OF THINGS THAT I USED TO
16 DO THAT I AM NOT PRESENTLY DOING AND GOING TO CHURCH HAPPENS
17 TO BE ONE OF THEM.

18 Q NOW, I'D LIKE TO -- LET ME WITHDRAW THAT.

19 WHEN YOU STOPPED BEING AFFILIATED WITH THE
20 CHURCH, WHATEVER YEAR THAT WAS, DID ANYONE DO OR SAY
21 ANYTHING TO TRY TO GET YOU BACK INTO THE CHURCH?

22 A NO.

23 Q DID ANYBODY THREATEN, HARASS, INTIMIDATE YOU IN
24 ANY WAY WHEN IT BECAME CLEAR YOU WERE NO LONGER GOING TO BE
25 AFFILIATED WITH THE CHURCH?

26 A NO.

27 Q ONCE YOU CEASED BEING AFFILIATED WITH THE
28 CHURCH, DID YOU HAVE ANY OCCASIONS WHEN YOU HAD ANY CONTACT

1 WITH MEMBERS OF THE CHURCH?

2 A YES. AND THAT'S JUST IMPLICIT IN THE FACT THAT
3 I HAD FRIENDS THAT --

4 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR.
5 NONRESPONSIVE, SELF-SERVING.

6 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

7 Q BY MR. KLEIN: OKAY. YOU SAID YES.

8 WHAT WAS THE NATURE OF THE CONTACT THAT YOU HAD
9 WITH THE CHURCH AFTER YOU STOPPED BEING AFFILIATED WITH IT?

10 A FRIENDS THAT I HAD PRIOR TO ENTERING THE
11 CHURCH.

12 Q YOU STILL REMAINED FRIENDLY WITH THEM AFTER YOU
13 LEFT THE CHURCH?

14 A ABSOLUTELY.

15 Q DID THEY SHUN YOU OR TRY TO AVOID YOU IN ANY
16 WAY?

17 A NO. WE ARE AS CLOSE AS EVER.

18 Q YOU STILL HAVE SOME -- LET ME WITHDRAW THAT.
19 LET'S GO BACK TO SUMMIT UNIVERSITY, JANUARY
20 THROUGH MARCH OF 1975. DID YOU KNOW GREGORY MULL AT THAT
21 TIME?

22 A YES, I DID.

23 Q DID HE ATTEND SUMMIT UNIVERSITY AT THE SAME
24 TIME YOU ATTENDED?

25 A SIMULTANEOUS, SAME QUARTER.

26 Q WHY DON'T YOU TELL US ABOUT WHAT LIFE WAS LIKE
27 AT SUMMIT UNIVERSITY JANUARY THROUGH MARCH OF '75 WHEN YOU
28 ATTENDED.

1 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT
2 CALLS FOR A NARRATIVE ANSWER.

3 THE COURT: PLEASE REPHRASE YOUR QUESTION.

4 MR. KLEIN: YES, YOUR HONOR.

5 Q WHY DON'T YOU GIVE US AN IDEA OF A TYPICAL DAY
6 AT SUMMIT UNIVERSITY IN JANUARY THROUGH MARCH OF 1975.

7 A WE WOULD RISE EARLY. WE WOULD GO ON A BUS TO
8 SUMMIT UNIVERSITY WHERE WE WOULD MEET FOR A DECREE SESSION.

9 Q WHAT WOULD YOU DO ON THE BUS, ANYTHING?

10 A SOMETIMES WE WOULD SING, SOMETIMES WE WOULD
11 PRAY TOGETHER, SOMETIMES WE WOULD STUDY, SOMETIMES WE WOULD
12 TALK.

13 Q THEN YOU GOT TO SUMMIT UNIVERSITY. WHAT WOULD
14 YOU DO THERE?

15 A THEN WE WOULD EAT, WE WOULD EAT BREAKFAST. WE
16 WOULD MEET FOR A DECREE SESSION.

17 Q WHEN YOU WOULD EAT BREAKFAST, WHERE WOULD YOU
18 EAT IT?

19 A WE HAD A CAFETERIA.

20 Q AND WHAT KIND OF FOOD DID YOU HAVE THERE?

21 A WELL, IT WAS VEGETARIAN IN NATURE, BUT IT WAS A
22 VERITABLE FEAST. I MISS IT. WE HAD EVERYTHING. SPROUTS,
23 FRUITS, VEGETABLES, LEGUMES, ANYTHING NECESSARY FOR THE
24 SUSTAINING OF THE BODY.

25 Q WAS THE DIET SUFFICIENT FOR YOU?

26 A MORE THAN SUFFICIENT.

27 Q AFTER YOU FINISHED BREAKFAST, WHAT WOULD YOU
28 DO?

1 A OKAY. WE WOULD COME BACK, AND WE WOULD BEGIN
2 OUR CLASSES AND IT WAS LIKE A REGULAR COLLEGE. IT WAS LIKE
3 CLASSROOM SITUATION, SPECIFIC COURSES, STUDY ENVIRONMENT,
4 BOOKS, NOTES, HOMEWORK.

5 Q AND AFTER YOU FINISHED YOUR MORNING CLASSES,
6 WHAT WOULD HAPPEN THEN?

7 A WELL, WE ALWAYS HAD OUR BREAK FOR LUNCH. WE
8 ALWAYS HAD A MIDDAY DECREE SESSION AND THEN WE WOULD GO BACK
9 INTO OUR CLASSES AGAIN.

10 Q LET'S TALK ABOUT DECREE. DID YOU DECREE WHILE
11 YOU WERE THERE?

12 A YES.

13 Q WHAT EFFECT, IF ANY, DID DECREERING HAVE ON YOU?

14 A IT ENERGIZES, IT CLEARS YOUR MIND SO THAT YOU
15 CAN ACT MORE EFFECTIVELY, THINK MORE CLEARLY. IT MADE ME
16 HEALTHIER, IT MADE ME FEEL BETTER ABOUT LIFE, ABOUT MYSELF.

17 Q SINCE YOU CEASED YOUR AFFILIATION WITH THE
18 CHURCH, DO YOU EVER DECREE?

19 A YES, I DO. I ALSO PRAY.

20 Q WHY DO YOU STILL DECREE?

21 A BECAUSE IT IS EFFECTIVE.

22 Q IT IS EFFECTIVE IN WHAT WAY?

23 A IT STILL DOES THE SAME THING IT DID THEN, WHICH
24 IS TO CLEAR MY MIND, HELP ME TO ACT MORE EFFECTIVELY, FEEL
25 GOOD ABOUT MYSELF AND THOSE AROUND ME AND FEEL HEALTHY.

26 Q AFTER DECREERING ON THAT TYPICAL DAY AT SUMMIT
27 UNIVERSITY, WHAT WOULD YOU DO NEXT?

28 A OKAY. THEN WE WOULD GO THROUGH OUR AFTERNOON

1 STUDIES.

2 Q WOULD THE AFTERNOON STUDIES BE ANY DIFFERENT
3 THAN FROM WHAT YOU DESCRIBED IN THE MORNING?

4 A IT IS LIKE COLLEGE, YOU KNOW. YOU HAVE YOUR
5 SPECIFIC COURSES YOU STUDY IN THE MORNING YOU HAVE YOUR
6 SPECIFIC COURSES YOU STUDY IN THE EVENING OR THE AFTERNOON.

7 Q OKAY. AFTER THE AFTERNOON STUDY SESSIONS, THEN
8 WHAT WOULD YOU DO?

9 A THEN WE WERE RELEASED. AND IF I RECALL, WE
10 WOULD GO BACK TO WHERE WE WERE LIVING AND BE FREE TO STUDY,
11 DO HOMEWORK OR WHATEVER.

12 Q WHERE WERE YOU LIVING?

13 A THERE WERE EVENING DECREE SESSIONS, BUT I CAN'T
14 RECALL IF THEY WERE DIRECTLY FOLLOWING OUR STUDIES.

15 Q WHERE WERE YOU LIVING?

16 A IN A CONDOMINIUM TYPE SITUATION, VERY ROOMY,
17 LARGE, COMFORTABLE.

18 Q NOW, DID YOU EVER HAVE ANY FREE TIME ON THE
19 WEEKENDS AND THE EVENINGS?

20 A OH, YEAH.

21 Q WHAT WOULD YOU DO ON A WEEKEND? CAN YOU RECALL
22 WHAT A TYPICAL WEEKEND, SAY SATURDAY, WHAT WOULD YOU DO ON A
23 SATURDAY AT SUMMIT UNIVERSITY DURING JANUARY TO MARCH, 1975?

24 A TYPICAL SATURDAY. WELL, LITTLE BIT OF
25 EVERYTHING. IT WAS TIME FOR RECREATION, WALKING,
26 CONTEMPLATING. IT WAS FREE TIME. WE COULD DO HOMEWORK IF
27 WE SO DESIRED, CONTINUED OUR STUDIES IF WE SO DESIRED. I
28 WALKED THE BEACH A LOT. WE WERE THERE IN SANTA BARBARA.

1 TALKED TO OUR FRIENDS.

2 Q YOU SAID YOU HAD HOMEWORK. WERE YOU ABLE TO
3 GET YOUR HOMEWORK DONE AND STILL HAVE SOME FREE TIME TO DO
4 THINGS YOU 'VE TALKED ABOUT?

5 A IT DEPENDS ON THE INDIVIDUAL. I HAVE A SON
6 RIGHT NOW THAT HAS A PROBLEM WITH THAT. BUT IT HAS TO DO
7 WITH HOW YOU SCHEDULE YOUR TIME.

8 Q DID YOU GET SUFFICIENT REST AND SLEEP DURING
9 THOSE THREE MONTHS YOU WERE AT SUMMIT UNIVERSITY?

10 A YES, I DID.

11 Q WHAT EFFECT, IF ANY, DID THE SUMMIT UNIVERSITY
12 EXPERIENCE HAVE ON YOU?

13 A A VERY PROFOUND EFFECT. I TOOK A SMALL SIP
14 FROM A VERY LARGE CUP AND I WILL NEVER BE EMPTY AGAIN.

15 Q WHAT WERE YOU TAUGHT AT SUMMIT UNIVERSITY AS
16 FAR AS THE ROLE OF ELIZABETH CLARE PROPHET IN THE CHURCH?

17 A SHE WAS OUR SPIRITUAL LEADER.

18 Q WHAT WERE YOU TAUGHT AS FAR AS -- I AM SORRY.

19 A THAT IS WHAT WE WERE TAUGHT. IF YOU WANT TO
20 KNOW WHAT SHE IS TO ME PERSONALLY, THAT IS A DIFFERENT
21 QUESTION.

22 Q WHAT IS SHE TO YOU PERSONALLY?

23 A AT THE TIME, SHE WAS A FACILITATOR. THAT IS
24 THE BEST WORD I CAN USE FOR IT.

25 Q WHAT IS A FACILITATOR?

26 A IT IS A PERSON WHO AIDS IN YOUR SPIRITUAL
27 GROWTH, IN THIS CASE IT IS SPIRITUAL, FACILITATES YOUR
28 GROWTH, HELPS SUSTAIN IT, HELPS DIRECT IT AND HOPEFULLY

1 HELPS ACCELERATE IT. BUT IN NO WAY, SHAPE OR FORM IS A
2 FACILITATOR INDISPENSABLE.

3 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY THAT
4 ELIZABETH CLARE PROPHET IS PERFECT AND NEVER MAKES MISTAKES?

5 A NEVER.

6 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY THAT
7 YOU SHOULD FEAR NONCHURCH MEMBERS?

8 A (SHAKES HEAD FROM SIDE TO SIDE.)

9 Q YOU HAVE TO GIVE AN AUDIBLE ANSWER.

10 A NO.

11 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY THAT
12 YOU SHOULD HAVE NO COMMUNICATION WITH NONCHURCH MEMBERS?

13 A ABSOLUTELY NOT.

14 Q WHILE YOU WERE AT SUMMIT UNIVERSITY, DID YOU
15 HAVE COMMUNICATION WITH NONCHURCH MEMBERS?

16 A YES.

17 Q WHAT, IF ANYTHING, IS TAUGHT AT SUMMIT
18 UNIVERSITY OR IN THE CHURCH ABOUT HONESTY?

19 A ONE OF THE FIRST THINGS THAT I REMEMBER BEING
20 TAUGHT -- AND IT STUCK WITH ME EVER SINCE AND BEAR IN MIND
21 THIS WAS 12 YEARS AGO -- WE WERE TAUGHT SOMETHING CALLED THE
22 MACHIAVELLIAN CONCEPT, WHICH BASICALLY STATES THAT THE ENDS
23 DOES NOT JUSTIFY THE MEANS. AND THAT IF YOU LIE OR COMMIT
24 ANY OTHER SPIRITUAL MISTAKE IN ORDER TO ACHIEVE THOSE ENDS,
25 THEN THE ENDS ARE AT BEST TEMPORARY.

26 Q DURING THE TIME YOU WERE A CHURCH MEMBER, WERE
27 YOU MARRIED -- DID YOU GET MARRIED?

28 A I GOT MARRIED.

1 Q WHO MARRIED YOU?

2 A ELIZABETH CLARE PROPHET.

3 Q WERE YOU REQUIRED TO ASK HER PERMISSION IN
4 ORDER TO GET MARRIED?

5 A THAT WAS NOT MY UNDERSTANDING. MY
6 UNDERSTANDING -- NOW MICHAEL IS THE ONE THAT DRAFTED THE
7 LETTER --

8 Q MICHAEL WAS YOUR HUSBAND?

9 A YES. AND I KNOW THAT HE INFORMED HER OF OUR
10 INTENTIONS. HE HAD ACTUALLY PROPOSED TO ME PRIOR TO EITHER
11 OF US ENTERING SUMMIT UNIVERSITY. THEN HE REAFFIRMED THE
12 PROPOSAL FOLLOWING HIS QUARTER AT SUMMIT UNIVERSITY, WROTE
13 HER TELLING HER OF OUR INTENTIONS AND WE DID -- WE DID ASK
14 FOR HER BLESSING.

15 Q BUT WAS IT YOUR UNDERSTANDING THAT YOU HAD TO
16 ASK HER PERMISSION AS OPPOSED TO A BLESSING?

17 A THAT WAS NOT MY UNDERSTANDING.

18 Q DID SHE GIVE YOU HER BLESSING?

19 A YES.

20 Q WHILE YOU WERE A MEMBER OF THE CHURCH, DID YOU
21 HAVE A CHILD?

22 A YES.

23 Q DID YOU HAVE TO ASK ELIZABETH CLARE PROPHET FOR
24 PERMISSION TO HAVE THAT CHILD?

25 A NO.

26 Q DID YOU HAVE TO ASK HER FOR ADVICE ON WHETHER
27 TO HAVE THAT CHILD?

28 A NO.

1 Q WHEN YOU WERE A MEMBER OF THE CHURCH, WHEN YOU
2 WERE AT SUMMIT UNIVERSITY, DO YOU BELIEVE YOU WERE
3 CONTROLLED OR MANIPULATED OR COERCIVELY PERSUADED BY
4 ANYBODY?

5 A ABSOLUTELY NOT.

6 Q IS THERE ANY DOUBT IN YOUR MIND AS TO WHETHER
7 YOU WERE BEING CONTROLLED OR MANIPULATED WHEN YOU WERE A
8 CHURCH MEMBER?

9 A NO.

10 Q DID YOU BELIEVE THAT YOU ALWAYS HAD FREE WILL
11 TO LEAVE OR STAY WITH THE CHURCH, WHATEVER YOU WANTED?

12 A ABSOLUTELY.

13 Q WHEN YOU EVENTUALLY BECAME -- CEASED YOUR
14 AFFILIATION WITH THE CHURCH, DID YOU HAVE ANY FEAR AS TO
15 WHETHER YOU WERE GOING TO BE HARASSED OR INTIMIDATED OR
16 THREATENED IN ANY WAY?

17 A NO. AND I NEVER RECEIVED ANY EITHER.

18 Q WHEN YOU LEFT THE CHURCH, DID ANYBODY EVER DO
19 ANYTHING TO TRY TO STOP YOU FROM LEAVING?

20 A NO.

21 Q DID YOU KNOW GREGORY MULL -- DID YOU HAVE ANY
22 CONTACT WITH GREGORY MULL AFTER YOU LEFT SUMMIT UNIVERSITY?

23 A YES, I DID.

24 Q WHAT WAS THE NATURE OF THAT CONTACT?

25 A GREGORY OFFERED HIS HOUSE IN SAN FRANCISCO FOR
26 THOSE OF US WHO WANTED TO RENT SPACE THERE TO COME SO THAT
27 WE COULD STILL BE TOGETHER AS A GROUP AND DECREE, BUT
28 CONDUCT LIVES OTHERWISE AND GET OUR JOBS AND SO FORTH THERE.

1 SO HE OFFERED THAT AND I ACCEPTED.

2 Q WHEN YOU SAY HE OFFERED IT, DID YOU HAVE TO PAY
3 RENT OR WAS IT FOR FREE?

4 A NO. WE PAID RENT.

5 Q AND DID YOU RENT A ROOM FROM HIM IN HIS HOUSE?

6 A YES, I DID.

7 Q FOR HOW LONG DID YOU DO THAT?

8 A (NO AUDIBLE RESPONSE.)

9 Q FOR HOW LONG DID YOU STAY IN HIS HOUSE?

10 A STAY. APPROXIMATELY TWO MONTHS, ONE AND A HALF
11 TO TWO MONTHS.

12 Q DID YOU HAVE AN AGREEMENT WITH GREGORY MULL
13 WITH RESPECT TO RENTING THAT ROOM AND THE MONEY THAT WOULD
14 BE PAID TO HIM?

15 A YES, I DID.

16 Q DID HE UPHOLD THAT AGREEMENT?

17 A NO.

18 Q WHAT HAPPENED?

19 A WE AGREED THAT MY RENT WOULD BEGIN UPON MY
20 ARRIVAL. AND I MADE IT VERY CLEAR TO HIM AT THE ONSET THAT
21 IF HE NEEDED A RENTER IN THERE FOR THE DURATION OF A MONTH
22 OR HOWEVER LONG IT WOULD TAKE ME, THAT TO DO SO.

23 BUT IF HE COULD WAIT, THEN I WOULD COME IN AS
24 SOON AS I COULD GO BACK TO DENVER, VISIT WITH MY PARENTS,
25 GET MY THINGS TOGETHER. THEN I WOULD COME OUT, AND MY RENT
26 WOULD BEGIN UPON MY ARRIVAL AND WE AN AGREED TO THAT.

27 Q WHAT HAPPENED?

28 A WHEN I ARRIVED, I REMINDED HIM OF OUR AGREEMENT

1 AND HE WAS RATHER AMBIGUOUS AT THE TIME. HE SAID, "WELL,
2 YOU KNOW, WE WILL WORK IT OUT. WE WILL WORRY ABOUT IT
3 LATER." AND THAT'S EXACTLY WHAT HAPPENED, IT CAME UP LATER.

4 Q WHEN IT CAME UP LATER, WHAT HAPPENED?

5 A I WAS CHARGED.

6 Q DID HE JUST ASK YOU FOR THE MONEY OR DID HE DO
7 IT ANOTHER WAY?

8 A NO, HE DID IT ANOTHER WAY.

9 Q HOW DID HE GET THE MONEY?

10 A AT THE TIME, THERE WERE THOSE OF US WHO WERE
11 ACTUALLY EMPLOYED BY GREGORY BECAUSE HE WAS HAVING PAINTING
12 DONE INSIDE THE HOUSE. AND SO WE WERE BEING PAID AN HOURLY
13 WAGE, AND WE WOULD KEEP TRACK OF OUR HOURS AND THEN HE WOULD
14 ISSUE US A CHECK. SO WHEN IT CAME TIME FOR ME TO LEAVE, MY
15 LAST CHECK WAS MINUS THE FUNDS FOR THE PERIOD OF TIME THAT I
16 WASN'T THERE.

17 Q DID YOU TALK TO HIM ABOUT THAT?

18 A YES, I DID. I RETURNED AND SPOKE WITH HIM
19 ABOUT IT AND --

20 Q WHAT WAS SAID AS BEST AS YOU CAN RECALL?

21 A AS BEST I CAN RECALL -- WELL, IT WAS A CLOSED
22 ISSUE, NUMBER ONE. HE MADE THAT CLEAR. AND HE ADDED SOME
23 THINGS TO IT.

24 SOMETHING EVIDENTLY HAD GONE ON THERE DURING MY
25 ABSENCE. WHAT IT WAS, I HAVE NO IDEA, BUT HE WAS VERY ANGRY
26 WITH A LOT OF THE PEOPLE THERE. AND TOLD ME IN ESSENCE THAT
27 AS FAR AS HE WAS CONCERNED, THE PEOPLE THERE WOULD BE
28 WILLING TO WALK OVER HIS DEAD BODY TO GET TO THEIR

1 ASCENSION. AND SO -- AND THAT WAS THE END OF IT.

2 Q DID HE EVER PAY YOU THE MONEY?

3 A NO.

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

5 THANK YOU. NO FURTHER QUESTIONS.

6

7

CROSS-EXAMINATION +

8

BY MR. LEVY:

9 Q MISS FLEMING, WOULD YOU TELL US HOW OLD YOU
10 ARE?

11 A YES. I AM 36.

12 Q YOU WERE WHAT, 24, 25 WHEN YOU WENT TO SUMMIT
13 UNIVERSITY?

14 A TWENTY-FIVE.

15 Q I DON'T KNOW WHETHER IT WAS A FREUDIAN SLIP OR
16 NOT, BUT WHEN YOU TOLD US ABOUT THE NICE DAY AT SUMMIT
17 UNIVERSITY, YOUR WORDS WERE AT THE END OF THE DAY, YOU WERE
18 RELEASED.

19 NOW, DID SOMEONE KEEP YOU THERE AND THEN
20 RELEASE YOU; IS THAT WHAT YOU MEANT?

21 A I HAVE ALWAYS REFERRED, EVEN IN MY COLLEGE
22 YEARS, TO BEING RELEASED FROM CLASSES. ACADEMICALLY AT THE
23 UNIVERSITY OF DENVER, WHEN A CLASS WAS OVER, I WAS RELEASED
24 FROM CLASS. AND IT IS IN THAT MODE THAT THAT WORD WAS USED
25 AND INTENDED.

26 Q YOU ARE INTO THEATER ARTS, ARE YOU?

27 A YES.

28 Q YOU DO A LITTLE BIT OF ACTING NOW AND THEN?

1 A YES.

2 Q YOU GOT AN EMMY OR OSCAR SO FAR?

3 A NO.

4 Q TRYING FOR IT, THOUGH?

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

6 THE WITNESS: NO.

7 MR. KLEIN: IT IS ARGUMENTATIVE.

8 THE WITNESS: NO, I'M NOT. I AM NOT TRYING FOR IT.

9 Q BY MR. LEVY: YOU JUST DO IT AS A HOBBY?

10 A I DO IT BECAUSE I LOVE IT. I HAVE DONE IT FOR
11 THE LAST 20 YEARS. I DID IT FOR A LIVING FOR ABOUT FIVE.

12 Q WHEN YOU WERE AT CHURCH UNIVERSAL AND
13 TRIUMPHANT, DID YOU EVER LIVE AT CAMELOT?

14 A NO.

15 Q DID YOU EVER BECOME PART OF STAFF?

16 A NO.

17 Q YOUR ONLY CONNECTION HAS BEEN AS A MEMBER?

18 A THAT'S RIGHT. A STUDENT AND THEN A MEMBER.

19 Q NOW WE HAVE HEARD A LOT ABOUT PRAYING AND
20 DECREES.

21 A UH-HUH.

22 Q AND SOME PEOPLE HAVE TOLD US THEY ARE BOTH THE
23 SAME THING. IN YOUR OPINION, ARE PRAYING AND DECREES THE
24 SAME THING?

25 A MY OPINION IS THAT DECREEING IS A FORM OF
26 PRAYER. THERE IS A SUBTLE DIFFERENCE. IS THAT THE NEXT
27 QUESTION?

28 Q NO. I DON'T HAVE THEM PREPARED LIKE MR. KLEIN.

1 ARE YOU ANTICIPATING A NEXT QUESTION?

2 A I WAS, YES. I WILL STOP THERE.

3 Q GOOD.

4 NOW, WHY DON'T YOU TELL US WHAT THE SUBTLE
5 DIFFERENCE IS BETWEEN DECREERING AND PRAYING?

6 A DECREERING -- LET ME SAY THAT PRAYING, FOR ME,
7 YOU ARE IN A RECEPTIVE MODE. YOU ARE ASKING. DECREERING IS
8 AN ACTIVE MODE IN THAT YOU ARE SENDING OUT LOVE, YOU ARE
9 SENDING OUT ENERGY, POSITIVE ENERGY AND LOVE. AND IT IS A
10 SUBTLE DIFFERENCE, BUT TO ME THAT IS THE DIFFERENCE.

11 Q OKAY. THIS IS AN INSERT, AND IT IS FOR THE
12 STAFF AND IT IS MARKED AS EXHIBIT NUMBER 107.

13 SINCE IT IS SIX PAGES LONG, I AM GOING TO JUST
14 ASK YOU, WITH THE COURT'S PERMISSION, IF YOU WILL READ THIS
15 DECREE INSERT, WHICH IS ONE OF THOSE THINGS YOU WERE JUST
16 TELLING US ABOUT, ONE OF THOSE SUBTLE MODES.

17 WOULD YOU READ FOR US THE CONTENT OF THIS PAGE
18 AND THE OTHER SIDE SO WE CAN SEE AND UNDERSTAND EXACTLY WHAT
19 YOU DO WHEN YOU DECREE.

20 MR. KLEIN: YOUR HONOR, I AM AGAIN GOING TO OBJECT TO
21 THAT EXHIBIT AND TO IT BEING READ. IT IS -- IN MY OPINION,
22 IT VIOLATES THE FIRST AMENDMENT OF THE CONSTITUTION TO READ
23 A PRAYER FROM THIS --

24 THE COURT: JUST STATE THE GROUNDS.

25 MR. KLEIN: VIOLATES THE FIRST AMENDMENT OF THE
26 CONSTITUTION.

27 THE COURT: OVERRULED.

28 Q BY MR. LEVY: YOU CAN READ IT TO US.

1 A OKAY. (READING.)

2 "IN THE NAME OF ALMIGHTY GOD,
3 IN THE NAME OF THE LIVING WORD, I CALL TO
4 THE THE SEVEN BELOVED CHOHANS, THE SEVEN
5 BELOVED ARCHANGELS, THE SEVEN MIGHTY ELOHIM,
6 THE LORDS OF KARMA, THE COSMIC COUNCIL, THE
7 GREAT DIVINE DIRECTOR, SURYA AND CUZCO,
8 MIGHTY COSMOS AND BELOVED MAXIMUS, ALPHA AND
9 OMEGA, HELIOS AND VESTA, THE GREAT CENTRAL
10 SUN MAGNET, HERCULES, ASTREA, MICHAEL, AND
11 MORYAI

12 "I DEMAND ACTION FROM THE HEART
13 OF GOD AND THE GREAT CENTRAL SUN ON ALL
14 OPPOSITION TO THE CYCLES OF THE GREAT BLUE
15 CAUSAL BODY OF THE GREAT DIVINE DIRECTOR AND
16 THE DIVINE PLAN FOR EARTH AND HER EVOLUTIONS
17 MANIFEST THROUGH THE ENTIRE SPIRIT OF THE
18 GREAT WHITE BROTHERHOOD IN SPIRIT AND IN
19 MATTER!

20 "I DEMAND THE REVERSING OF THE
21 TIDE OF THE ENTIRE MOMENTUM OF CRITICISM,
22 CONDEMNATION, AND JUDGMENT, ALL HATE AND
23 HATE CREATION DIRECTED AGAINST ME OR THE
24 LIGHT FOR WHICH I STAND, THE MESSENGERS AND
25 THEIR CHELAS, CAMELOT, THE COMMUNITY OF THE
26 HOLY SPIRIT, EVERY KEEPER OF THE FLAME AND
27 STAFF MEMBER, M.I. AND S.U. STUDENT, AND ALL
28 SERVANTS OF THE LIGHT OF GOD THAT NEVER

1 FAILS THROUGHOUT THE EARTH!

2 "I DEMAND THAT ENERGY DRAWN UP
3 INTO A MIGHTY BLUE SPHERE. I DEMAND IT
4 ROLLED BACK. I DEMAND THE INSTANTANEOUS
5 JUDGMENT UPON THOSE WHO ARE SENDING IT
6 FORTH. I DEMAND THE REVERSING OF THE TIDE
7 AND I DEMAND THE ROLLING BACK OF THAT ENERGY
8 NOW BY THE AUTHORITY OF ALMIGHTY GOD VESTED
9 WITHIN ME.

10 "IN THE NAME OF THE FATHER, THE
11 SON, THE HOLY SPIRIT, AND THE MOTHER, I
12 DEMAND ACTION OF THE COSMIC COUNCIL, THE
13 KARMIC BOARD, THE GREAT GOD STAR SIRIUS, THE
14 SEAT OF AUTHORITY AND STRONGHOLD OF THE
15 GREAT WHITE BROTHERHOOD. I DEMAND THE
16 ARCING OF THAT ENERGY OF THE GOD
17 CONSCIOUSNESS OF SIRIUS IN THE HEARTS OF THE
18 MESSENGERS AND THEIR CHELAS FOR THE SECURING
19 OF THE FORCEFIELD OF THE GREAT WHITE
20 BROTHERHOOD, ITS PHYSICAL STRONGHOLD,
21 COMMUNITY, ORGANIZATION -- ACTION AND
22 IMPLEMENTATION OF THE WORD AND WORK OF THE
23 LORD UPON EARTH.

24 "I DEMAND THE REVERSING OF THE
25 TIDE OF ALL CONDEMNATION OF THE GREAT WHITE
26 BROTHERHOOD, THE TRUE TEACHINGS OF CHRIST
27 AND BUDDHA, THE ASCENDED MASTERS, THEIR
28 MESSENGERS AND CHELAS. I DEMAND THE BINDING

1 OF ALL CRITICISM, CONDEMNATION, AND JUDGMENT
2 OF ALL WORLD COMMUNISM, THE CAPITALIST
3 CONSPIRATORS, THE POWER ELITE, FANATICAL
4 FUNDAMENTALISTS, NEIGHBORS AND ENEMIES OF
5 THE LIGHT.

6 "ROLL IT BACK BY THE HOLY
7 SPIRIT! BIND THOSE SERPENTS! BIND THOSE
8 DEMONS AND DISCARNATES! BIND THE ENTIRE
9 ASTRAL HORDES! BIND THE DEMONS AND
10 DISCARNATES OF DEATH AND HELL IN THE
11 BOTTOMLESS PIT! BIND THE ENTIRE FALLEN ONES
12 AND THE SINISTER FORCE! I DEMAND IT IN THE
13 NAME OF THE COSMIC CHRIST. I DEMAND GOD
14 FREEDOM AND THE FULL POWER OF THE VIOLET
15 FLAME AND THE RUBY RAY, MIGHTY ASTREA'S
16 CIRCLE AND SWORD OF BLUE FLAME AND THE
17 LEGIONS OF ARCHANGEL MICHAEL TO CONSUME THE
18 CAUSE AND CORE OF THE CONSCIOUSNESS OF THE
19 BETRAYERS OF THE LIGHT IN THESE FOUL SPIRITS
20 AND THEIR FALSE ACCUSATIONS AND ANY AND ALL
21 AGITATION OF THE SINISTER FORCE AGAINST THE
22 FRIENDS OF FREEDOM WORLDWIDE. I DEMAND IT
23 ROLLED BACK.

24 "I CALL FORTH THE HOLY SPIRIT.
25 ROLL THEM BACK! BOLTS OF BLUE LIGHTNING!
26 TAKE THEM UP IN A MIGHTY BLUE SPHERE! TAKE
27 THE ASTRAL HORDES OF DEATH AND HELL OFF THE
28 EARTH IN THIS HOUR. I DEMAND THE BINDING OF

1 ALL ASTRAL INFLUENCES UPON INDIVIDUALS IN
2 EMBODIMENT THAT WOULD TURN THEM AGAINST THE
3 LIGHT OF THEIR OWN MIGHTY I AM GOD PRESENCE
4 AND BELOVED CHRIST SELF. I DEMAND THE
5 CUTTING FREE OF THE CHILDREN OF THE LIGHT
6 WHO ARE BURDENED BY ANY AND ALL GOSSIP AND
7 THE GOSSIP ENTITY, THE LIAR AND HIS LIE, ALL
8 FALSEHOOD, FALSIFICATION, AND
9 MISINTERPRETATION OF THE LORD'S WORK AND
10 WORD THROUGH THE MESSENGERS AND CHELAS OF
11 THE ASCENDED MASTERS AT CAMELOT AND IN THE
12 FIELD!

13 "BOLTS OF BLUE LIGHTNING! I
14 DEMAND THE CLEARING OF THE WAY FOR THE
15 HONEST COVERAGE NOW IN THE LOS ANGELES TIMES
16 AND ALL NEWSPAPERS, MAGAZINES, AND RADIO AND
17 TV NEWS SERVICES OF THE TRUE MANIFESTATION
18 OF THE FACTS AND FIGURES OF TRUTH WITHIN
19 THIS ACTIVITY OF LIGHT.

20 "I CALL FOR THE INTERCESSION OF
21 THE HOSTS OF THE LORD: BELOVED EL MORYA,
22 BELOVED MOTHER MARY, BELOVED LANELLO,
23 BELOVED SAINT GERMAIN, BELOVED LADY KRISTINE
24 AND K-17, BELOVED GREAT DIVINE DIRECTOR,
25 JESUS AND KUTHUMI, WE ASK YOU TO COME INTO
26 ACTION NOW IN THE ENTIRE FEDERAL GOVERNMENT
27 CONDEMNATION OF THIS PROPERTY AND THE
28 CONDEMNATION OF THE PROPERTY OF THE CHILDREN

1 OF THE LIGHT THROUGHOUT AMERICA. BOLTS OF
2 BLUE LIGHTNING! BOLTS OF BLUE LIGHTNING!
3 BOLTS OF BLUE LIGHTNING! THEY SHALL NOT
4 PASS! THEY SHALL NOT PASS! THEY SHALL NOT
5 PASS!

6 "IN THE NAME OF THE LIVING
7 WORD, I INVOKE THE HOSTS OF THE LORD FOR THE
8 PROTECTION OF PRIVATE PROPERTY AND THE FREE
9 ENTERPRISE SYSTEM AND INDIVIDUAL INITIATIVE,
10 FREEDOM OF RELIGION, FREEDOM OF ASSEMBLY,
11 FREEDOM OF THE PRESS, AND FREEDOM OF SPEECH.
12 I DEMAND ACTION NOW! I DEMAND ACTION NOW!
13 I DEMAND ACTION NOW! BLAZE BLUE LIGHTNING
14 THROUGH! BLAZE BLUE LIGHTNING THROUGH!
15 BLAZE BLUE LIGHTNING THROUGH! I DEMAND THE
16 OPPOSITION BOUND AND I DEMAND THE REVERSING
17 OF THE TIDE ON THAT ENERGY AND ITS SUBSTANCE
18 ON CAMELOT.

19 "I CALL FOR THE RING-PASS-NOT
20 ON CAMELOT AND AROUND EACH INDIVIDUAL HEART
21 OF LIGHT. I CALL FOR THE MIGHTY TUBE OF
22 LIGHT! I DEMAND THE REVERSING OF THAT TIDE!
23 I CALL FOR THE FULL POWER OF THE HOSTS OF
24 THE RUBY RAY: SANAT KUMARA, GAUTAMA BUDDHA,
25 BELOVED LORD MAITREYA, THE LORD JESUS
26 CHRIST, WE DEMAND ACTION. WE CALL FOR THE
27 JUDGMENT. WE CALL FOR THE ACTION OF THE
28 LIGHT. WE DEMAND IT ROLLED BACK AND

1 CONSUMEDI ROLLED BACK AND CONSUMEDI ROLLED
2 BACK AND CONSUMEDI BY LEGIONS OF FIERY
3 SALAMANDERS OF PRINCE OROMASIS AND DIANA.

4 "BELOVED MIGHTY ASTREA AND
5 PURITY AND LEGIONS OF LIGHT, LOCK YOUR
6 COSMIC CIRCLES AND SWORDS OF BLUE FLAME IN,
7 THROUGH, AND AROUND ALL MALIGNING OF THE
8 MESSENGERS AND STAFF BY DEPROGRAMMERS, THE
9 CLOCK OF BETRAYERS, FUNDAMENTALISTS, AND
10 LAGGARDS AND FALLEN ONES AND ALL INDIVIDUALS
11 INFLUENCED BY THEM. SEIZE, PIN, AND BIND!
12 SEIZE, PIN, AND BIND! SEIZE, PIN, AND BIND!
13 SERPENT AND HIS SEED, THEIR MECHANIZATION
14 CONCEPT AND EVERY ANTI HOLY SPIRIT
15 MANIFESTATION IN CAMELOT, AMERICA, AND THE
16 WORLD!"

17 Q THERE IS A PART IN PARENTHESIS ON THE BOTTOM.
18 WOULD YOU READ THAT ALSO?

19 A OKAY. (READING.)

20 "HERE INSERT ANY SPECIFIC
21 SITUATIONS AND NAMES REQUIRING THE IMMEDIATE
22 COUNTERACTION OF THE LIGHT ON THE ACTIONS OF
23 DARKNESS AND THE DARK ONES."

24 Q WHEN IT SAYS "INSERT NAMES" THERE, WAS IT THE
25 CHURCH PRACTICE TO PUT PEOPLE'S NAMES THERE?

26 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT PURSUANT
27 TO FIRST AMENDMENT TO THE CONSTITUTION.

28 THE COURT: OVERRULED.

1 THE WITNESS: YES.

2 Q BY MR. LEVY: YOU PUT PEOPLE'S NAMES THERE?

3 A ON OCCASION.

4 Q OKAY. NOW, I NOTE IN A PORTION OF THIS, ON THE
5 FIRST PAGE THAT YOU READ, IT TALKED ABOUT DEMONS AND
6 DISCARNATES.

7 DOES YOUR CHURCH TEACH ABOUT DEMONS AND
8 DISCARNATES?

9 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT BASED ON
10 THE FIRST AMENDMENT TO THE CONSTITUTION.

11 THE COURT: OVERRULED.

12 THE WITNESS: FIRST I'D LIKE TO REAFFIRM --

13 Q BY MR. LEVY: YOU CAN SAY YES OR NO, MA'AM.
14 THAT IS ALL THE QUESTION ASKED FOR.

15 A YOU CALLED IT MY CHURCH.

16 Q WELL, THE CHURCH YOU WERE AFFILIATED WITH.

17 A THANK YOU. YES.

18 Q WHILE YOU WERE TAKING YOUR TRAINING AT SUMMIT
19 UNIVERSITY, YOU CALLED IT A REGULAR SCHOOL, IT WAS JUST LIKE
20 A REGULAR COLLEGE.

21 DID THEY TEACH YOU ABOUT THE CLOCK OF BETRAYAL?

22 A I AM SORRY, I DON'T KNOW WHAT THAT IS.

23 Q THAT WAS ONE OF THE THINGS YOU READ ON THE
24 SECOND PAGE. DO YOU REMEMBER EXACTLY WHAT IT WAS THAT THEY
25 DID TEACH YOU AT SUMMIT UNIVERSITY?

26 A I REMEMBER WE HAD A BIBLE CLASS, I REMEMBER WE
27 ALSO STUDIED THE TEACHINGS OF SIR THOMAS MOORE, WE STUDIED
28 HIS BOOK "UTOPIA," WE STUDIED THE LIFE OF CHRIST. THOSE ARE

1 THE THINGS I RECALL RIGHT OFFHAND.

2 Q DID YOU EVER STUDY THE PROTOCOLS OF THE ELDERS
3 OF THE ZION?

4 A WE MAY HAVE. I DON'T RECALL.

5 Q WHAT ABOUT BOOKS ABOUT HYPNOTISM? DID
6 ELIZABETH EVER TEACH YOU ABOUT HYPNOTISM OR BLACK MAGIC OR
7 THE OCCULT?

8 A YES.

9 Q DO YOU RECALL WHAT ELIZABETH TOLD THE GROUP HER
10 MISSION WAS ON THIS PLANET?

11 A THE ONLY THING THAT HAS STUCK IN MY MIND IS
12 THAT SHE IS A FACILITATOR. I AM NOT SURE IF THAT IS THE
13 EXACT WORD SHE USED OR NOT, BUT THAT IS THE WORD THAT
14 DESCRIBES WHAT MY THOUGHT ABOUT IT IS.

15 Q DO YOU REMEMBER ANYTHING ELSE SPECIFICALLY
16 ABOUT YOUR THREE MONTHS AT SUMMIT UNIVERSITY WITH REGARD TO
17 WHAT YOU WERE TAUGHT OR WHAT YOU READ OR WHAT YOU STUDIED?

18 A JUST CERTAIN ATTITUDES, I GUESS, TOWARDS PEOPLE
19 WHICH STILL HOLD ME IN GOOD STEAD. LOVING, FORGIVING
20 ATTITUDES THAT I AM PASSING ONTO MY SON, FEELINGS OF
21 GOODWILL THAT I HOPE TOUCH THE PEOPLE WHEN I WORK AT SIZZLER
22 DAY-TO-DAY.

23 MR. LEVY: NOTHING FURTHER, MA'AM.

24

25 REDIRECT EXAMINATION +

26 BY MR. KLEIN:

27 Q YOU SAID THAT YOU WERE TAUGHT ABOUT BLACK
28 MAGIC, THE OCCULT AND HYPNOTISM. WHAT WERE YOU TAUGHT ABOUT

1 BLACK MAGIC?

2 A WE WERE, NUMBER ONE, TAUGHT OF THE EXISTENCE OF
3 IT. THAT BLACK MAGIC AND WHITE MAGIC BOTH USE OR FUNCTION
4 IN THE SAME WAY. IT IS JUST THE INTENT BEHIND IT AND HOW IT
5 IS USED.

6 Q WAS THAT ABOUT IT FOR BLACK MAGIC?

7 A YES. ANYONE CAN USE IT, ANYONE CAN USE BLACK
8 MAGIC, ANYONE CAN USE THE SPIRITUAL FORCES OF CHRIST.

9 Q WHAT ABOUT THE OCCULT? WHAT WERE YOU TAUGHT
10 ABOUT THE OCCULT?

11 A THERE IS A DELINEATION BETWEEN PSYCHIC
12 PHENOMENON AND SPIRITUALITY. THERE IS A DELINEATION. AND
13 YOU HAVE TO — YOU HAVE TO BE CAREFUL OF THE PSYCHIC
14 PHENOMENON. JUST SPIRITUAL GROWTH IS FAR MORE IMPORTANT
15 THAN READING SOMEONE'S MIND.

16 Q WHAT WERE YOU TAUGHT ABOUT HYPNOTISM?

17 A I DON'T KNOW THAT I WAS TAUGHT ANYTHING
18 SPECIFIC ABOUT HYPNOTISM. I HAVE MY OWN FEELINGS ABOUT IT,
19 BUT I DON'T REMEMBER BEING SPECIFICALLY TAUGHT ANYTHING
20 ABOUT HYPNOTISM.

21 Q WITH RESPECT TO BLACK MAGIC, WERE YOU TAUGHT
22 THAT THAT'S SOMETHING GOOD OR SOMETHING BAD, SOMETHING TO
23 TRY TO —

24 A BLACK MAGIC?

25 Q YES.

26 A IT IS NOT GOOD.

27 Q YOU SAID THAT NAMES WERE PUT INTO THAT DECREE
28 THAT MR. LEVY SHOWED YOU. WHAT WAS THE PURPOSE OF THAT AS

1 FAR AS YOU UNDERSTOOD IT?

2 A' WHENEVER I DO A DECREE, WHENEVER I HAVE IN THE
3 PAST AND WHENEVER I DO ONE NOW, I ONLY DO IT WITH THE ENERGY
4 OF LOVE. SO ANY NAME THAT IS PUT IN THERE NEVER RECEIVES
5 FROM ME ANY NEGATIVITY, ANY PSYCHIC PROJECTION OF HATRED,
6 ANY DESIRE FOR ILLNESS, DISEASE OR HARM TO COME TO THAT
7 INDIVIDUAL.

8 WHEN A NAME IS INSERTED -- AND EVEN TO THIS DAY
9 IN MY OWN PERSONAL LIFE, I DO BRING NAMES INTO MY DECREES --
10 I AM ASKING FOR GOD'S WILL. I AM ASKING FOR THESE PERSONS
11 TO BE BROUGHT TO THE ATTENTION WITHIN THIS GIVEN SITUATION
12 AND NEVER IS THE ENERGY DIRECTED AT THOSE INDIVIDUAL PEOPLE.

13 THE DECREE IS DIRECTED AT THE FORCES -- THE
14 SPIRITUAL FORCES THAT ARE WORKING IN AND THROUGH ALL PEOPLE,
15 ALL PEOPLE, ALL -- THOSE WHO ARE MANIFESTING GOOD IN LIFE
16 AND THOSE WHO ARE MANIFESTING NEGATIVITY IN LIFE. I HAVE
17 NEVER PROJECTED THROUGH -- IN THROUGH -- IN OR THROUGH A
18 DECREE A NEGATIVE FORCE AGAINST AN INDIVIDUAL.

19 MR. KLEIN: THANK YOU.

20 NO FURTHER QUESTIONS, YOUR HONOR.

21 MR. LEVY: JUST ONE OR TWO MORE QUESTIONS, YOUR
22 HONOR.

23

24 RECROSS-EXAMINATION +

25 BY MR. LEVY:

26 Q ON THE VERY FIRST PAGE OF THIS, LET ME READ
27 JUST A SMALL PORTION TO YOU. IT SAYS: (READING.)

28 "TAKE DOMINION NOW OVER: . . .

1 ALL BETRAYERS OF THE IMMORTAL GURUS AND
2 THEIR MESSENGERS ON THE CLOCK OF
3 BETRAYAL"

4 WHAT WERE YOU TAUGHT THAT MEANT IN THE CHURCH?

5 A THE CLOCK OF BETRAYAL DID NOT, TO MY KNOWLEDGE,
6 EXIST WHEN I WENT TO SUMMIT UNIVERSITY. I AM NOT FAMILIAR
7 WITH THAT TEACHING.

8 Q JUST ONE OTHER QUESTION THEN OR MAYBE TWO.
9 JANE FLEMING, IS THAT YOUR STAGE NAME?

10 A NO. WELL, YES. IT IS MY LEGAL NAME AND ALSO
11 IT'S BEEN CLEARED THROUGH EQUITY, SO I USE IT BOTH WAYS.

12 Q IT IS BOTH PERSONAL AND YOUR PROFESSION, STAGE
13 NAME?

14 A YES.

15 MR. LEVY: NOTHING FURTHER.

16 THANK YOU.

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

18 THE COURT: ALL RIGHT. YOU ARE EXCUSED.

19 THE WITNESS: THANK YOU.

20 MR. KLEIN: MR. DONALD FUCCI, YOUR HONOR.

21

22 DONALD FUCCI, +

23 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
24 TESTIFIES AS FOLLOWS:

25 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.
26 PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR
27 FIRST AND LAST NAME.

28 THE WITNESS: DONALD FUCCI, F-U-C-C-I. FIRST NAME IS

1 DONALD, D-O-N-A-L-D.

2 THE CLERK: THANK YOU.

3

4

DIRECT EXAMINATION +

5

BY MR. KLEIN:

6

7

Q HAVE YOU EVER BEEN AFFILIATED WITH CHURCH
UNIVERSAL AND TRIUMPHANT?

8

A YES, I HAVE AND I AM.

9

Q WHAT IS YOUR CURRENT AFFILIATION?

10

A I AM A CHURCH MEMBER.

11

Q ARE YOU A STAFF MEMBER?

12

A NO, I AM NOT.

13

14

Q WHEN DID YOU FIRST BECOME AFFILIATED WITH
CHURCH UNIVERSAL AND TRIUMPHANT?

15

A 1977.

16

Q WHAT WAS YOUR STATUS AT THAT TIME?

17

A I WAS A STUDENT AT SUMMIT UNIVERSITY.

18

19

Q AND DID THERE COME A TIME YOU BECAME A STAFF
MEMBER?

20

A YES.

21

Q WHEN WAS THAT?

22

23

A JANUARY OF 1978 AFTER SUMMIT UNIVERSITY, I
JOINED THE STAFF.

24

25

Q AND DID THERE COME A TIME THAT YOU CEASED
BECOME -- CEASED BEING A STAFF MEMBER?

26

A YES. IN 1982.

27

28

Q AND SINCE THEN, YOU HAVE JUST BEEN A MEMBER,
BUT NOT A STAFF MEMBER?

1 A THAT'S CORRECT.

2 Q SINCE YOU HAVE BEEN WITH THE CHURCH, HAVE YOU
3 WORKED -- DID YOU EVER WORK IN THE ARCHITECTURAL DEPARTMENT?

4 A YES, I DID.

5 Q NOW, WERE YOU WORKING AT CAMELOT IN THE YEAR
6 1979 AND '80?

7 A YES.

8 Q WERE YOU WORKING IN THE ARCHITECTURAL
9 DEPARTMENT?

10 A I WAS.

11 Q WERE YOU -- DID YOU KNOW GREGORY MULL AT THAT
12 TIME?

13 A I DID.

14 Q WAS HE WORKING AT THE ARCHITECTURAL DEPARTMENT
15 THE SAME TIME YOU WERE?

16 A YES, HE WAS.

17 Q WHAT WAS HIS STATUS, VIS-A-VIS YOU?

18 A WELL, HE WAS THE DEPARTMENT HEAD AT THAT TIME
19 AND I WORKED UNDER HIM.

20 Q HOW DID IT COME ABOUT THAT YOU WORKED IN THAT
21 DEPARTMENT UNDER HIM?

22 A I WAS ASKED TO.

23 Q BY WHOM?

24 A WELL, INITIALLY BY MR. MULL AND THEN THE BOARD
25 OF DIRECTORS OF THE CHURCH.

26 Q DID HE GIVE YOU ASSIGNMENTS?

27 A YES.

28 Q WHAT IS YOUR EDUCATIONAL BACKGROUND IN THE

1 FIELD OF ARCHITECTURE?

2 A I HAVE TWO AND A HALF YEARS OF COMMUNITY
3 COLLEGE, WHICH I MAJORED IN ARCHITECTURAL DRAFTING. AND
4 THEN SUBSEQUENT TO THAT, I HAD THREE AND A HALF YEARS AT THE
5 UNIVERSITY OF NORTH CAROLINA WHERE I STUDIED ARCHITECTURAL
6 DESIGN.

7 Q DID YOU RECEIVE A DEGREE IN ARCHITECTURAL
8 DRAFTING?

9 A I RECEIVED AN ASSOCIATE OF ARTS FROM THE
10 COMMUNITY COLLEGE.

11 Q NOW, WITH RESPECT TO THE COURSES YOU TOOK AT
12 THE COMMUNITY COLLEGE WHERE YOU RECEIVED THAT DEGREE, CAN
13 YOU TELL US WHAT WAS THE NATURE OF THE ARCHITECTURAL WORK
14 THAT YOU WERE TRAINED TO DO THERE?

15 A WELL, I RECEIVED EXTENSIVE TRAINING IN THE
16 ACTUAL REPRESENTATION OF BUILDINGS GRAPHICALLY IN THE FORM
17 OF DRAFTING, FLOOR PLANS, ELEVATIONS, CONSTRUCTION DETAILS,
18 SPECIFICATIONS, BUILDING SCHEDULES AND SO FORTH.

19 Q WHAT PRACTICAL EXPERIENCE HAVE YOU HAD IN THE
20 FIELD OF ARCHITECTURE?

21 A APPROXIMATELY A COMBINED TOTAL OF ABOUT THREE
22 YEARS WORKING FOR VARIOUS ARCHITECTS AND LANDSCAPE
23 ARCHITECTS.

24 Q DOES THAT INCLUDE WORKING FOR MR. MULL ALSO?

25 A YES, IT DID.

26 Q WHAT ARE PRELIMINARY DRAWINGS?

27 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THERE
28 HAS BEEN NO FOUNDATION AS TO THE EXPERTISE OF THIS WITNESS.

1 THE COURT: DO YOU WANT TO ASK HIM A FEW MORE
2 QUESTIONS?

3 Q BY MR. KLEIN: DURING THE COURSE OF YOUR
4 TRAINING WHEN YOU RECEIVED YOUR DEGREE, DID YOU HAVE ANY
5 TRAINING IN PRELIMINARY DRAWINGS?

6 A YES. PRELIMINARY DRAWINGS ARE USED TO
7 BASICALLY --

8 THE COURT: JUST A SECOND. I THINK YOU'VE ANSWERED
9 THE QUESTION.

10 Q BY MR. KLEIN: WAS THAT PART OF WHAT YOU WERE
11 TRAINED TO DO WHEN YOU RECEIVED YOUR DEGREE, PRELIMINARY
12 DRAWINGS?

13 A YES.

14 Q WHAT ARE PRELIMINARY DRAWINGS?

15 MR. LEVY: OBJECTION, YOUR HONOR. SAME -- MAY I TAKE
16 THIS WITNESS ON VOIR DIRE FOR JUST ONE QUESTION?

17 THE COURT: ALL RIGHT.

18

19 VOIR DIRE EXAMINATION +

20 BY MR. LEVY:

21 Q MR. FUCCI, ARE YOU LICENSED BY THE STATE OF
22 CALIFORNIA AS AN ARCHITECT, AS A DRAFTSMAN OR AS ANYTHING
23 WITHIN THE FIELD OF ARCHITECTURE OR BUILDING DESIGN?

24 A NO, I'M NOT.

25 MR. LEVY: I WOULD OBJECT TO ANY STATEMENTS WITH
26 REGARD TO ANY DEGREE OF EXPERTISE ON THE BASIS OF THIS
27 WITNESS WHO IS CLEARLY NO EXPERT.

28 MR. KLEIN: YOUR HONOR, I WOULD --

1 THE COURT: JUST WAIT.

2 THE COURSES YOU TOOK AT THE COMMUNITY COLLEGE,
3 THEY WERE IN DRAFTING?

4 THE WITNESS: YES, SIR. ACTUALLY, THE ASSOCIATE OF
5 ARTS DEGREE WAS IN ARCHITECTURAL DRAFTING SPECIFICALLY.

6 THE COURT: AND WHAT DID ARCHITECTURAL DRAFTING MEAN?

7 THE WITNESS: WELL, WE WERE TRAINED TO GENERATE A SET
8 OF DRAWINGS THROUGH WHICH A BUILDING COULD ACTUALLY BE
9 BUILT.

10 THE COURT: NOW, IT IS TRUE IN MANY BUSINESSES AND
11 PROFESSIONS THAT PEOPLE DO THINGS UNDER THE SUPERVISION OF
12 SOMEBODY ELSE. AND YOU SAY THAT YOU WERE TRAINED TO
13 GENERATE ARCHITECTURAL DRAWINGS FROM WHICH A BUILDING MIGHT
14 BE CONSTRUCTED.

15 IS THAT UNDER THE SUPERVISION OF A LICENSED
16 ARCHITECT?

17 THE WITNESS: YES.

18 THE COURT: DO I UNDERSTAND CORRECTLY THAT YOU WERE
19 NOT TRAINED TO DO THESE THINGS ON YOUR OWN?

20 THE WITNESS: NO, THAT ACTUALLY ISN'T CORRECT BECAUSE
21 I WAS TRAINED IN THE SENSE THAT I COULD HAVE PROCEEDED TO
22 GET A LICENSE AS A BUILDING DESIGNER AND I WAS QUALIFIED TO
23 DO SO, BUT NEVER DID SO.

24 THE COURT: WE ARE NOT TALKING ABOUT WHAT MIGHT HAVE
25 BEEN OR WHAT YOU MIGHT HAVE DONE. WE ARE TALKING ABOUT WHAT
26 DID HAPPEN AND WHAT HAS HAPPENED.

27 AS I UNDERSTAND IT, YOU HAD SOME TRAINING TO
28 GENERATE SOME PLANS UNDER THE SUPERVISION OF A LICENSED

1 ARCHITECT; IS THAT A FAIR --

2 THE WITNESS: I BELIEVE THE WAY YOU PUT THAT WAS THAT
3 WHAT DID I ACTUALLY DO WITH THAT, AND THAT IS WHAT I DID
4 WITH IT. I DID GENERATE DRAWINGS FOR ARCHITECTS, BUT THAT
5 WASN'T SPECIFICALLY THE LINE OF TRAINING.

6 THE TRAINING WAS INTENDED TO BE SELF-SUFFICIENT
7 IN THAT TERMS AND THAT I COULD ACTUALLY GO FORTH AND DO
8 THAT, BUT I DID NOT DO THAT.

9 THE COURT: AT SOME POINT YOU STOPPED SHORT OF THAT.
10 WHAT DID YOU DO AT THE UNIVERSITY OF NORTH CAROLINA?

11 THE WITNESS: I STUDIED ARCHITECTURAL DESIGN.

12 THE COURT: DID YOU RECEIVE A DEGREE THERE?

13 THE WITNESS: NO, I DIDN'T.

14 THE COURT: SO THAT THE ONLY DEGREE THAT YOU'VE EVER
15 RECEIVED IS THE A.A. DEGREE?

16 THE WITNESS: THAT'S CORRECT.

17 THE COURT: NOW, IF THAT IS THE CASE, WHAT MORE WOULD
18 YOU HAVE HAD TO DO IN ORDER TO BE LICENSED AS AN ARCHITECT
19 OR AS A BUILDING DESIGNER?

20 THE WITNESS: WELL, AS A BUILDING DESIGNER, I SIMPLY
21 WOULD HAVE HAD TO HAVE ESTABLISHED A WORK HISTORY. I DON'T
22 REALLY RECALL HOW LONG IT TAKES. I THINK TWO YEARS. AND
23 APPLY FOR THE LICENSE AND PASS THE TEST.

24 NOW, I DIDN'T CHOOSE TO DO THAT. I CHOSE TO GO
25 ON TO ARCHITECTURAL SCHOOL AND STUDY DESIGN TO BECOME AN
26 ARCHITECT. AND FOR WHATEVER REASONS, I DIDN'T COMPLETE THAT
27 TRAINING EITHER OR THAT TRAINING.

28 THE COURT: THERE ARE VARIOUS REASONS WHY YOU AND I

1 AND OTHERS HAVE DONE OTHER THINGS IN OUR LIVES. SO IF THAT
2 IS THE CASE, THEN YOU WOULD HAVE HAD TO HAVE HAD A
3 PARTICULAR WORK HISTORY AND YOU WOULD HAVE HAD TO HAVE
4 SURVIVED AN EXAMINATION AND IN ORDER TO BE -- TO HAVE BEEN
5 LICENSED; IS THAT CORRECT?

6 THE WITNESS: YES.

7 THE COURT: AT THE TIME THAT YOU FIRST WERE ASSIGNED
8 TO THE ARCHITECTURAL DEPARTMENT AT CHURCH UNIVERSAL AND YOU
9 ASSISTED MR. MULL, OR MR. MULL AT LEAST WAS THE HEAD OF THAT
10 DEPARTMENT AT THE TIME, HOW MUCH PRACTICAL EXPERIENCE HAD
11 YOU HAD THEN?

12 THE WITNESS: ABOUT TWO YEARS.

13 THE COURT: TEN YEARS?

14 THE WITNESS: TWO.

15 THE COURT: TWO. OUT IN INDUSTRY?

16 THE WITNESS: YES. I WORKED FOR SEVERAL
17 ARCHITECTURAL FIRMS AND LANDSCAPE ARCHITECTURAL FIRMS DURING
18 THAT PERIOD.

19 THE COURT: WHAT HAVE YOU BEEN DOING SINCE 1980?

20 THE WITNESS: I HAVE BEEN IN THE BUILDING TRADES EVER
21 SINCE LEAVING SCHOOL ACTUALLY IN 1967. THAT IS WHAT I CHOSE
22 TO DO. AND SINCE 1980, SPECIFICALLY I HAVE BEEN WORKING
23 DOING FINISH CARPENTRY AND CABINETS.

24 THE COURT: YOU ARE DOING OTHER THINGS, NOT DRAFTING
25 OR ARCHITECTURAL TYPE OF WORK?

26 THE WITNESS: ACTUALLY, PART OF THE -- MY WORK AS A
27 CABINETMAKER DOES INCLUDE DRAFTING, YES, TO PRESENT TO THE
28 CLIENT.

1 THE COURT: I SUPPOSE YOU DARN WELL BETTER BE ABLE TO
2 READ DRAWINGS.

3 THE WITNESS: I THINK SO.

4 THE COURT: I GUESS HE CAN ANSWER. PARDON ME FOR
5 ASKING SO MANY QUESTIONS.

6 THE WITNESS: QUITE ALL RIGHT.

7

8 DIRECT EXAMINATION + (RESUMED)

9 BY MR. KLEIN:

10 Q WHAT ARE PRELIMINARY DRAWINGS?

11 A A PRELIMINARY DRAWING DEALS WITH THE DESIGN
12 CONCEPT OF AN ARCHITECTURAL PROJECT OR BUILDING.

13 Q WHAT OTHER DRAWINGS ARE NECESSARY FOR AN
14 ARCHITECT TO GET TO THE POINT WHERE A CONTRACTOR CAN
15 ACTUALLY BUILD A BUILDING FROM THE ARCHITECTURAL DRAWINGS?

16 MR. LEVY: I AM GOING TO OBJECT TO THAT QUESTION,
17 YOUR HONOR. I BELIEVE THIS GENTLEMAN'S LACK OF EXPERTISE
18 HAS BEEN DEMONSTRATED. HE MAY KNOW WHAT PRELIMINARY
19 DRAWINGS ARE, BUT AS YET THERE IS NO EVIDENCE OF EXPERTISE.

20 THE COURT: SUSTAINED.

21 Q BY MR. KLEIN: WHEN YOU TOOK YOUR TRAINING WHEN
22 YOU RECEIVED YOUR DEGREE IN ARCHITECTURAL DRAFTING, DID YOU
23 RECEIVE TRAINING IN DRAFTING DRAWINGS OTHER THAN PRELIMINARY
24 DRAWINGS?

25 A YES, I DID. EXTENSIVELY, I MIGHT ADD.

26 Q DID YOU RECEIVE TRAINING IN DRAFTING
27 CONSTRUCTION DRAWINGS?

28 A YES, I DID.

1 Q WAS THAT PART OF THE TRAINING THAT YOU RECEIVED
2 PRIOR TO GETTING THAT DEGREE THAT YOU MENTIONED?

3 A I WOULD SAY IT WAS THE BULK OF THE TRAINING
4 BECAUSE THAT WAS -- THE CONSTRUCTION DRAWINGS ARE ACTUALLY
5 WHAT NEEDS TO BE COMMUNICATED TO BUILDERS IN ORDER TO MAKE
6 THE BUILDING OCCUR. AND SO MY TRAINING WAS INVOLVED IN
7 CONSTRUCTION DETAILS AND THE EXPRESSION OF THOSE EXPRESSION
8 IDEAS.

9 Q DURING THE YEARS THAT YOU WERE INVOLVED IN
10 PRACTICAL EXPERIENCE, THOSE THREE YEARS, WERE YOU INVOLVED
11 IN CONSTRUCTION DRAWINGS?

12 A VERY MUCH SO.

13 Q WHAT ARE CONSTRUCTION DRAWINGS?

14 A CONSTRUCTION DRAWINGS COMPRISE APPROXIMATELY 80
15 PERCENT OF ANY ARCHITECTURAL PROJECT. THEY COMMUNICATE THE
16 BUILDING IN TERMS OF FLOOR PLANS, INTERIOR AND EXTERIOR
17 ELEVATIONS, CONSTRUCTION DETAILS, MECHANICAL SYSTEMS,
18 PLUMBING, ELECTRICAL, THE ENTIRE GAMUT OF WHAT GOES INTO
19 COMPRISING A BUILDING.

20 Q IS THE CONSTRUCTION DRAWINGS THAT THE
21 CONTRACTOR USES WHEN HE FINALLY STARTS BUILDING THAT
22 BUILDING?

23 A I AM SORRY. CAN YOU REPEAT THAT?

24 Q WHEN THE CONTRACTOR STARTS TO BUILD THE
25 BUILDING, IS IT THE CONSTRUCTION DRAWINGS -- IS THAT WHAT HE
26 USES?

27 A YES.

28 Q YOU SAID THE CONSTRUCTION DRAWINGS WERE

1 APPROXIMATELY 80 PERCENT OF THE DRAWINGS. WOULD THE OTHER
2 20 PERCENT BE THE PRELIMINARY DRAWINGS?

3 A APPROXIMATELY. IT DEPENDS ON THE PROJECT, AND
4 THE SCOPE OF THE PROJECT, AND THE MAGNITUDE OF THE PROJECT,
5 DEPENDING ON THE DESIGN CONCEPTS THAT WERE GOING INTO IT,
6 AND HOW MANY TIMES THEY HAD TO BE REVISED OR UPDATED OR
7 CONFORMING TO THE CLIENT'S NEEDS. YES, I'D SAY THAT 20
8 PERCENT WERE PRELIMINARY DRAWINGS AND ABOUT 80 PERCENT ARE
9 CONSTRUCTION DRAWINGS.

10 Q AT THIS TIME I AM SHOWING THE WITNESS WHAT HAS
11 BEEN MARKED NUMBER 1 IN EVIDENCE, CAMELOT BOOK, AND I AM
12 GOING TO DIRECT HIS ATTENTION TO PAGE 32, A TEN-YEAR PLAN.

13 WHILE YOU WERE WORKING IN THE ARCHITECTURE
14 DEPARTMENT WITH MR. MULL IN 1979 TO 1980, WERE YOU AWARE OF
15 THE PROJECTS FROM THE TEN-YEAR PLAN THAT THE ARCHITECTURAL
16 DEPARTMENT AND MR. MULL WERE WORKING ON?

17 A YES, I WAS.

18 Q BY THE WAY, HOW MANY -- WHERE DID THE
19 ARCHITECTURAL DEPARTMENT ACTUALLY WORK?

20 A WELL, THERE WERE TWO ROOMS IN WHAT WE CALL THE
21 CHAPEL OF THE HOLY GRAIL, WHICH IS LOCATED AT CAMELOT ON THE
22 SECOND FLOOR SIDE BY SIDE. ONE WAS MR. MULL'S ROOM AND ONE
23 WAS THE DRAFTING ROOM THAT WAS USED BY CHARLES BRIGHT MOST
24 OF THE TIME. AND THAT'S WHERE IT WAS LOCATED.

25 Q IS THAT WHERE ALL THE ARCHITECTURAL WORK WAS
26 DONE BY THE ARCHITECTURE DEPARTMENT AND MR. MULL?

27 A YES.

28 Q NOW, LOOKING AT THE PROJECTS ON THAT TEN-YEAR

1 PLAN, PAGE 32 OF EXHIBIT I IN EVIDENCE, DID GREGORY MULL AND
2 THE ARCHITECTURAL DEPARTMENT DO PRELIMINARY DRAWINGS FOR ANY
3 OF THOSE PROJECTS?

4 A YES. THE MONTESSORI BUILDING COMPLEX.

5 Q THE MONTESSORI, IS THAT THE PRIMARY AND
6 SECONDARY SCHOOL?

7 A WELL, IT IS THE TOTAL SCHOOL, YES.

8 Q DID GREGORY MULL AND THE ARCHITECTURAL
9 DEPARTMENT DO PRELIMINARY DRAWINGS ON ANY OTHER OF THOSE
10 PROJECTS LISTED IN THE TEN-YEAR PLAN?

11 A NO. THAT WAS THE PRINCIPAL ONE, THAT WAS THE
12 ONLY ONE.

13 Q DID GREGORY MULL OR THE ARCHITECTURAL
14 DEPARTMENT DO ANY CONSTRUCTION DRAWINGS ON ANY OF THE
15 PROJECTS LISTED IN THE TEN-YEAR PLAN?

16 A NO.

17 Q DID THEY DO ANY CONSTRUCTION DRAWINGS ON THE
18 MONTESSORI INTERNATIONAL PROJECT?

19 A NO, NOT CONSTRUCTION DRAWINGS.

20 Q JUST PRELIMINARY DRAWINGS?

21 A YES.

22 Q DURING THE TIME THAT YOU WORKED WITH MR. MULL
23 AT CAMELOT, DID HE EVER DISCUSS WHAT HIS FEELINGS WERE ABOUT
24 LIVING AT CAMELOT? DID HE EVER SAY ANYTHING ONE WAY OR THE
25 OTHER?

26 A YES. I -- I THINK THAT THAT HAD OCCURRED ON A
27 FEW OCCASIONS.

28 Q CAN YOU RECALL ANYTHING HE SAID ABOUT WHAT --

1 WHAT HIS FEELINGS WERE ABOUT LIVING THERE?

2 A WELL, MY INITIAL IMPRESSIONS ARE WHEN I FIRST
3 STARTED WORKING IN THE DEPARTMENT AND GETTING TO KNOW HIM --
4 THE COURT: JUST A SECOND. THE QUESTION IS --

5 Q BY MR. KLEIN: WHAT DID HE SAY? I DIDN'T ASK
6 FOR YOUR IMPRESSIONS. CAN YOU RECALL SPECIFIC THINGS HE
7 SAID ABOUT IT?

8 A I WAS AWARE OF THE FACT THAT HE HAD GONE
9 THROUGH A DIVORCE --

10 Q THE QUESTION WAS WHAT DID HE SAY? IF YOU CAN'T
11 RECALL --

12 A NO, I CAN. I AM JUST TRYING TO ESTABLISH WHERE
13 I HAD HEARD WHAT I HAD HEARD.

14 I RECALL HIM TELLING ME THAT HE HAD SURVIVED
15 THE DEMISE OF HIS MARRIAGE ESSENTIALLY, WAS GLAD TO BE IN
16 THE SITUATION, THAT HE WAS IN A COMMUNITY OF PEOPLE THAT
17 WERE SUPPORTIVE AND DOING THE WORK THAT HE WAS DOING I THINK
18 WAS THE GIST OF ALL THE THINGS THAT I CAN RECALL HIM SAYING.

19 Q DID HE EVER SAY ANYTHING TO YOU ABOUT FEELING
20 MANIPULATED OR CONTROLLED WHILE HE WAS LIVING AT CAMELOT?

21 A NO.

22 Q DID HE EVER SAY ANYTHING TO YOU ABOUT NOT
23 GETTING ADEQUATE FOOD OR SLEEP WHILE HE WAS AT CAMELOT?

24 A NEVER.

25 Q I TAKE IT YOU WERE IN HIS ROOM ON NUMEROUS
26 OCCASIONS?

27 A EVERY WEEK FOR THAT PERIOD OF TIME.

28 Q THAT YOU WORKED WITH HIM?

1 A YES.

2 Q DID HE HAVE A REFRIGERATOR IN THERE?

3 A YES.

4 Q DID HE HAVE A BED?

5 A YES.

6 Q NOW, TO YOUR KNOWLEDGE, DID THERE COME A TIME
7 AT CAMELOT WHEN GREGORY MULL PERFORMED WORK FOR PRIVATE
8 CLIENTS AS OPPOSED TO FOR THE CHURCH?

9 A YES.

10 Q HOW DO YOU KNOW THAT?

11 A I WORKED FOR HIM DOING THE DRAWINGS FOR THOSE
12 CLIENTS.

13 Q HOW MUCH DID HE PAY YOU?

14 A TEN DOLLARS AN HOUR AS I RECALL.

15 Q THESE WERE FOR PRIVATE CLIENTS, NOT THE CHURCH
16 WORK?

17 A YES.

18 Q DO YOU KNOW IF THE CHURCH OFFICIALS WERE AWARE
19 THAT HE WAS WORKING ON OUTSIDE CLIENTS?

20 A YES. AT LEAST THAT IS THE IMPRESSION THAT I
21 WAS GIVEN BY HIM, OR ELSE I WOULDN'T HAVE BEEN DOING IT
22 MYSELF BECAUSE I WAS VOLUNTEER STAFF AT THAT POINT.

23 Q DO YOU KNOW IF ANYBODY EVER PROHIBITED MR. MULL
24 FROM WORKING ON OUTSIDE PROJECTS?

25 A NO. HE WORKED IT RIGHT AT CAMPUS.

26 Q WHEN HE WORKED ON OUTSIDE PROJECTS, DID HE WORK
27 IN HIS OFFICE AT CAMELOT ON THOSE PROJECTS?

28 A YES.

1 Q ARE YOU MARRIED?

2 A YES.

3 Q DO YOU HAVE A CHILD?

4 A YES.

5 Q WHEN WAS YOUR CHILD BORN?

6 A FOUR AND A HALF MONTHS AGO.

7 Q DID YOU HAVE TO GET ELIZABETH CLARE PROPHET'S
8 PERMISSION TO HAVE THAT CHILD?

9 A NO.

10 Q WHAT INVOLVEMENT, IF ANY, DID SHE HAVE IN YOUR
11 DECISION TO HAVE A CHILD?

12 A NO INVOLVEMENT IN THAT DECISION AT ALL.

13 Q DURING THE TIME YOU HAVE BEEN A CHURCH MEMBER,
14 HAVE YOU HAD CONTACTS WITH NONCHURCH MEMBERS?

15 A OH, YES.

16 Q EVER HAVE THOSE CONTACTS RESTRICTED IN ANY WAY?

17 A NEVER.

18 Q WHAT CONTACT DO YOU HAVE WITH YOUR FAMILY OR
19 YOUR WIFE'S FAMILY SINCE YOU HAVE BEEN A CHURCH MEMBER?
20 WHAT IS THE NATURE OF THE CONTACT?

21 A WELL, WE -- ONCE A YEAR ON SOME HOLIDAY OR
22 THANKSGIVING OR CHRISTMAS, WHICHEVER, WE USUALLY GET
23 TOGETHER WITH MY WIFE'S PARENTS. MINE ARE DECEASED. AND
24 THEY ARE THE EXTENDED FAMILY.

25 Q WERE YOU EVER TAUGHT BY THE CHURCH YOU SHOULD
26 FEAR NONCHURCH MEMBERS?

27 A ABSOLUTELY NOT.

28 MR. LEVY: EXCUSE ME, YOUR HONOR.

1 Q BY MR. KLEIN: WERE YOU EVER TAUGHT IN THE
2 CHURCH THAT YOU SHOULDN'T COMMUNICATE WITH NONCHURCH
3 MEMBERS?

4 A NO.

5 Q DO YOU COMMUNICATE REGULARLY WITH NONCHURCH
6 MEMBERS?

7 A YES, I DO. I WORK WITH PEOPLE, TALK TO PEOPLE,
8 VISIT PEOPLE.

9 Q WHAT IS THE ROLE OF ELIZABETH CLARE PROPHET IN
10 THE CHURCH?

11 A WELL, SHE'S, FIRST OF ALL, A -- OUR SPIRITUAL
12 LEADER. I SAY OURS BECAUSE I AM PART OF THE CHURCH. I
13 RECOGNIZE THAT SHE PROVIDES LEADERSHIP IN MANY WAYS. I
14 THINK THAT HER EXAMPLE HAS PROVEN THROUGH THE YEARS THAT I
15 HAVE BEEN INVOLVED WITH THE CHURCH TO BE EXEMPLARY AND ONE
16 THAT I WOULD AS A PERSON CHOOSE TO EMANATE AND DO TO THE
17 BEST OF MY ABILITY.

18 I THINK THERE IS A MORAL TEACHING THAT COMES
19 FORTH, A -- AN EXPRESSION OF A WAY OF LIFE AND PROVISION FOR
20 A WORLD THAT WE ALL WANT TO SEE HAPPEN AND I SUBSCRIBE TO
21 THAT WHOLEHEARTEDLY.

22 Q HAVE YOU EVER BEEN TAUGHT THAT ELIZABETH CLARE
23 PROPHET IS PERFECT AND NEVER MAKES A MISTAKE?

24 A NO. QUITE TO THE CONTRARY, AS A MATTER OF
25 FACT.

26 Q WHAT HAVE YOU BEEN TAUGHT WITH RESPECT TO THAT?

27 A I WOULD BE -- I WOULD SUPPOSE TO SAY THAT SHE
28 WOULD BE THE FIRST TO ADMIT THAT SHE IS CAPABLE OF MAKING A

1 MISTAKE AND HAS IN FACT MADE MISTAKES. I ACTUALLY HEARD HER
2 SAY THAT.

3 Q THE CHURCH -- DOES THE CHURCH HAVE ANY
4 TEACHINGS ABOUT HONESTY, INTEGRITY, ANYTHING ABOUT THAT?

5 A YES, OF COURSE.

6 Q CAN YOU GIVE US THE GIST OF WHAT THE CHURCH'S
7 TEACHINGS ARE WITH RESPECT TO HONESTY AND INTEGRITY?

8 A WELL, I THINK THAT FIRST AND FOREMOST, THE
9 CHURCH DOESN'T ASSUME THE POSITION OF BEING THE VEHICLE FOR
10 ONE'S OWN HONESTY. BY THAT I MEAN THAT IT IS LEFT TO YOU TO
11 CHOOSE YOUR MORAL POSTURE, YOUR INTEGRITY, YOUR DEALINGS
12 WITH PEOPLE, WITH THE WORLD FROM THE POINT OF VIEW OF -- I
13 SUPPOSE SOMEWHAT ESOTERICALLY WE SPEAK OF KARMA AS A LAW OF
14 RETRIBUTION, THAT -- I MEAN IN A WAY OF SAYING THAT IS WHAT
15 GOES AROUND COMES AROUND.

16 SO IT IS LIKE IF YOU ARE LIVING YOUR LIFE TO
17 THE BEST OF YOUR ABILITY AND LEADING IT IN A WAY THAT YOU
18 UNDERSTAND GOD HAVING DO IT, THAT IS THE HIGHEST TEACHING
19 YOU CAN FOLLOW AND WHAT YOU ARE ENCOURAGED TO DO.

20 Q HAVE YOU EVER HEARD ELIZABETH CLARE PROPHET OR
21 ANY CHURCH OFFICIAL EVER ENCOURAGE IN ANY WAY LYING,
22 STEALING, CHEATING OR ANY DISHONESTY?

23 A ABSOLUTELY NOT.

24 Q NO DOUBT IN YOUR MIND?

25 A NO DOUBT IN MY MIND ABOUT THAT.

26 Q DO YOU DECREE?

27 A YES.

28 Q WHAT DOES DECREEING MEAN TO YOU?

1 A IT IS A VERY CONCENTRATED FORM OF PRAYER THAT I
2 IN MY SPIRITUAL SEARCHING HAVE FOUND TO BE VERY EFFECTIVE IN
3 DIRECTING MY ENERGY AND MY CONSCIOUSNESS TOWARD GOD AND
4 TOWARD WHAT I WOULD HAVE OCCUR IN MY LIFE OR IN THE LIFE OF
5 THE WORLD OR THE COMMUNITY THAT I BELONG TO.

6 Q WHAT EFFECT, IF ANY, DOES DECREERING HAVE ON
7 YOU?

8 A EFFECT?

9 Q EFFECT. WHEN YOU ARE DONE DECREERING, WHAT DO
10 YOU FEEL, IF ANYTHING?

11 A THAT I AM DONE DECREERING. THERE IS NO EFFECT.
12 I MEAN I SUPPOSE YOU COULD SAY THAT IF THE PRAYERS THAT I
13 HAD CALLED FOR WERE ANSWERED, THAT THOSE EFFECTS WOULD BE
14 OBVIOUS TO ME.

15 Q HAVE YOU EVER FELT THAT DECREERING LESSENEED YOUR
16 ABILITY TO CONTROL YOUR OWN THOUGHTS AND ACTIONS?

17 A QUITE TO THE CONTRARY.

18 Q WHAT DO YOU MEAN BY THAT, "QUITE TO THE
19 CONTRARY"?

20 A I THINK THEY ENHANCE THAT PROCESS.

21 Q IS THAT WHAT YOU'VE EXPERIENCED?

22 A YES.

23 Q IN THE YEARS THAT YOU HAVE BEEN A CHURCH
24 MEMBER, DO YOU FEEL YOU HAVE BEEN TREATED FAIRLY?

25 A VERY MUCH SO.

26 Q HAVE YOU EVER FELT ANY WAY THAT, AS A CHURCH
27 MEMBER, YOU WERE BEING MANIPULATED OR CONTROLLED BY
28 ELIZABETH CLARE PROPHET OR ANY CHURCH OFFICIAL?

1 A NO.

2 Q ANY DOUBT IN YOUR MIND ABOUT THAT?

3 A NO.

4 Q DO YOU BELIEVE YOU HAVE THE FREE WILL TO STAY
5 WITH OR LEAVE THE CHURCH ANY TIME YOU WANT?

6 A YES.

7 Q IS THERE ANY DOUBT THAT IF YOU WANTED TO LEAVE
8 TOMORROW, YOU CAN JUST SAY, "THAT'S IT. I AM GOING"?

9 A THERE IS NO DOUBT IN MY MIND THAT I CAN DO
10 THAT, NO.

11 Q DURING THE YEARS YOU HAVE BEEN WITH THE CHURCH,
12 HAVE YOU EVER BEEN AWARE OF CHURCH MEMBERS HARASSING OR
13 INTIMIDATING OR THREATENING PEOPLE WHO HAVE LEFT THE CHURCH?

14 A NO.

15 Q HAVE YOU EVER HEARD ANY CHURCH OFFICIAL TELL
16 ANYONE OR SUGGEST TO ANYONE THAT THEY SHOULD HARASS OR
17 INTIMIDATE OR THREATEN SOMEONE WHO HAS LEFT THE CHURCH?

18 A NO.

19 Q WOULD SUCH ACTION, HARASSING OR THREATENING OR
20 INTIMIDATING SOMEONE WHO LEFT THE CHURCH, WOULD THAT BE
21 CONSISTENT WITH THE PRINCIPLES OF THE CHURCH THAT YOU HAVE
22 BEEN TAUGHT?

23 A NO, IT WOULD NOT. IN FACT IF IT DID, I
24 WOULDN'T BE IN THIS CHURCH.

25 Q HAVE YOU EVER BEEN TAUGHT THAT IF YOU LEAVE THE
26 CHURCH, YOU ARE GOING TO DIE?

27 A NO.

28 Q HAVE YOU BEEN TAUGHT IF YOU LEAVE THE CHURCH,

1 YOU ARE GOING TO GO THROUGH 10,000 YEARS OF REEMBODIMENTS?

2 A NO. NO, I HAVEN'T.

3 Q HAVE YOU EVER BEEN TAUGHT THAT IF YOU LEAVE THE
4 CHURCH, YOU WON'T MAKE YOUR ASCENSION?

5 A NO.

6 Q IS THE TEACHINGS OF THIS CHURCH THAT THE ONLY
7 WAY THAT SOMEBODY CAN MAKE THEIR ASCENSION IS TO BE A MEMBER
8 OF CHURCH UNIVERSAL AND TRIUMPHANT?

9 A NO. I THINK THE WHOLE OF WHAT YOU ARE SAYING
10 HERE IS A TACT THAT IS AGAIN QUITE CONTRARY TO WHAT HAS BEEN
11 SAID. AND I SPECIFICALLY RECALL MOTHER HAVING SAID AT ONE
12 POINT THAT IF ANY OF US KNEW OF A BETTER WAY TO ACHIEVE OUR
13 INNER SPIRITUAL GOALS, TO PLEASE LET HER KNOW AND WE WOULD
14 ALL DO IT.

15 Q DID YOU GO TO SUMMIT UNIVERSITY?

16 A YES, I DID.

17 Q WHAT EFFECT, IF ANY, DID SUMMIT UNIVERSITY HAVE
18 ON YOU, YOUR LIFE?

19 A I WOULD SAY EXTREMELY POSITIVE EFFECT THAT I
20 WOULD BE HARD PRESSED TO PUT INTO WORDS BECAUSE IT WAS A
21 POINT OF EXPERIENCE IN MY LIFE WHERE I REALLY IMMERGED
22 MYSELF IN SPIRITUAL TEACHINGS.

23 AND I APPLIED MYSELF I THINK WITH CONCERTED
24 EFFORT TO UNDERSTAND THOSE TEACHINGS, AND THE TRUE GOALS OF
25 OUR LIFE, AND WHAT WE WANT TO ACHIEVE AND GOT THE CONTINUOUS
26 EXPERIENCE AND REINFORCEMENT OF A MEANS OF ACHIEVING THOSE
27 GOALS. AND IT TURNED — IT WAS A CHANGING POINT IN NOT ONLY
28 MY LIFE, BUT MY WIFE'S AS WELL.

1 Q WHAT YEAR DID YOU GO TO SUMMIT UNIVERSITY?

2 A THE FALL OF 1977.

3 Q WHAT, IF ANY, EFFECT HAS BEING A MEMBER OF THIS
4 CHURCH HAD ON YOUR LIFE?

5 A WELL, AGAIN I WOULD SAY --

6 MR. LEVY: I WOULD OBJECT, YOUR HONOR. CUMULATIVE,
7 RELEVANCE.

8 THE COURT: HE CAN ANSWER.

9 THE WITNESS: AGAIN, I WOULD SAY IN THE MOST POSITIVE
10 WAYS IT'S AFFORDED ME PERSONALLY A VIEW OF GOD AND TEACHINGS
11 THAT HAVE BEEN BROUGHT FORTH THROUGH THE PROPHETS FROM MANY
12 WALKS OF RELIGION AND OF LIFE THAT -- IN A CONDENSED WAY
13 THAT IS DIGESTIBLE, UNDERSTANDABLE, APPLICABLE TO ONE'S
14 LIFE.

15 AND IN SO DOING, I HAVE -- I FEEL THAT I HAVE
16 CHANGED AND GROWN TREMENDOUSLY AS A RESULT OF MY AFFILIATION
17 WITH THE CHURCH.

18 MR. KLEIN: THANK YOU.

19 I HAVE NO FURTHER QUESTIONS.

20

21 CROSS-EXAMINATION +

22 BY MR. LEVY:

23 Q MR. FUCCI, YOU UNDERSTAND THAT DURING THE
24 COURSE OF THIS TRIAL, WE MAY SOMETIMES TOUCH ON A PRAYER,
25 BUT YOUR RELIGION IS NOT ON TRIAL.

26 DO YOU UNDERSTAND THAT?

27 A WELL, AT TIMES IT SEEMS TO BE. BUT I THINK I
28 UNDERSTAND THAT, WHAT YOU ARE SAYING.

1 Q YOU UNDERSTAND THAT THE FIRST AMENDMENT GIVES
2 YOU THE RIGHT TO BELIEVE ANYTHING YOU WANT TO BELIEVE?

3 A YES.

4 Q NOW, MY PARENTS WERE JEWISH, SO NOMINALLY I AM
5 JEWISH. I STILL RECITE THE LORD'S PRAYER WHEN I GO TO A
6 CATHOLIC CHURCH WHERE MY WIFE PRAYS BECAUSE I LIKE THE
7 SINGING ON CHRISTMAS. SO EVEN THOUGH I RECITE THE LORD'S
8 PRAYER THERE, IT DOESN'T MEAN I AM INVESTIGATING THAT
9 RELIGION. WHAT WE ARE HERE FOR IS AN INVESTIGATING OF
10 CONDUCT.

11 DO YOU UNDERSTAND THAT?

12 A YES.

13 Q OKAY. AS LONG AS WE HAVE THAT CLEAR.

14 WHEN YOU WENT TO SUMMIT UNIVERSITY, DID YOU
15 EVER HEAR THE STATEMENT THAT ELIZABETH CLARE PROPHET HAD
16 BALANCED HER KARMA, AND SHE WAS 92 PERCENT KARMA FREE AND
17 THEREFORE SHE WAS NOT SUBJECT TO THE RULES THAT ALL THE
18 OTHER PEOPLE IN THE CHURCH WERE SUBJECT TO?

19 A NO, I DON'T RECALL HEARING THAT.

20 Q DID YOU ATTEND EVERY DAY?

21 A EVERY DAY.

22 Q ARE YOU ON PROBATIONARY STAFF OR PERMANENT
23 STAFF?

24 A NO, I'M NOT.

25 Q NEITHER ONE.

26 NOW, DURING THIS TIME -- BY THE WAY, MR. MULL,
27 WHEN I ASKED HIM, SAID YOU ARE A PRETTY GOOD DRAFTSMAN.

28 A THANK YOU.

1 Q HOW LONG DID YOU WORK IN WHAT YOU CALL THE
2 ARCHITECTURAL DEPARTMENT?

3 A AS BEST AS I CAN RECALL, ABOUT NINE OR TEN
4 MONTHS.

5 Q WHILE YOU WORKED THERE, THE ONLY PROJECT YOU
6 WORKED ON WAS THE MONTESSORI SCHOOL?

7 MR. KLEIN: I AM GOING TO OBJECT. THAT
8 MISCHARACTERIZES THE TESTIMONY, YOUR HONOR.

9 MR. LEVY: THAT IS JUST THE QUESTION.

10 THE COURT: HE CAN ANSWER.

11 THE WITNESS: THERE WERE, OF COURSE, MR. MULL'S OWN
12 PRIVATE PROJECTS TOWARD THE END OF HIS LEAVING. BUT AS FAR
13 AS THE CHURCH IS CONCERNED, I CAN'T RECALL SPECIFICALLY.
14 BUT IT SEEMS THAT THERE WERE SOME MINOR DRAWINGS THAT I DID
15 DO FOR — I AM SORRY, I CAN'T RECALL WHAT THE PROJECTS WERE.
16 BUT THEY WERE PRINCIPALLY THE MONTESSORI SCHOOLS IS WHAT I
17 WORKED ON MOST OF THE TIME.

18 Q BY MR. LEVY: WHEN DID YOU START WORKING IN
19 THAT DEPARTMENT?

20 A I BELIEVE IT WAS SPRING OR EARLY SUMMER OF
21 1979.

22 Q WOULD APRIL BE A REASONABLE GUESS ON MY PART?

23 A I THINK SO, YES.

24 Q SO FROM APRIL THROUGH THE END OF 1979, WE ARE
25 TALKING ABOUT ROUGHLY SEVEN OR EIGHT MONTHS?

26 A IF IN FACT IT WAS APRIL. IT MAY HAVE BEEN MAY
27 OR JUNE OR EVEN LATER. I REALLY CAN'T RECALL. I HAVE TRIED
28 TO RECALL THAT. I JUST DON'T KNOW.

1 Q SO IN SEVEN OR EIGHT MONTHS, WHAT YOU WORKED ON
2 PRIMARILY WAS THE MONTESSORI SCHOOL?

3 A PRIMARILY, YES.

4 Q NOW, IS THERE A SYSTEM OF WHAT'S KNOWN AS
5 HIERARCHS IN THE CHURCH?

6 A THERE ARE SUPERVISORS FOR VARIOUS DEPARTMENTS.
7 THEY ARE NOT -- WHAT DO YOU MEAN BY "HIERARCHS"?

8 Q ISN'T THAT A TERM THAT THE CHURCH USES WITH
9 REGARD TO PEOPLE WHO ARE IN CHARGE OF VARIOUS DEPARTMENTS?

10 A NO, IT IS NOT.

11 Q IF I WERE TO TELL YOU THAT ELIZABETH CLARE
12 PROPHET IN HER DEPOSITION EXPLAINED THE WORD "HIERARCH" TO
13 ME AND SAID IT WAS IN CONSTANT USE --

14 A THE TERM IS IN CONSTANT USE, YES.

15 Q OH, IT IS IN CONSTANT USE?

16 A BUT NOT IN REFERENCE TO STAFF MEMBERS.

17 Q I SEE.

18 A AS FAR AS I AM AWARE.

19 Q WELL, SINCE I AM NOT TOTALLY AWARE, MAYBE YOU
20 CAN ENLIGHTEN ME.

21 WOULD GREGORY MULL HAVE BEEN YOUR HIERARCH?

22 A NO.

23 Q WOULD EDWARD FRANCIS HAVE BEEN HIS HIERARCH?

24 A WELL, IF WHAT YOU ARE ASKING IS THERE, AS IN
25 ANY STRUCTURE, THERE IS A -- AN ORDER OF ANSWERABILITY,
26 PEOPLE HAVE LEVELS OF RESPONSIBILITY AND I SUPPOSE YOU COULD
27 SAY THAT IS HIERARCHAL IN STRUCTURE. AND I MUST SAY THAT
28 THE WORD HAS BEEN USED IN THE COMMUNITY REFERRING TO PEOPLE

1 WHO ARE IN HIERARCHY.

2 BUT I KNOW FOR A FACT THAT PRESENTLY ALL
3 DEPARTMENT HEADS AND PEOPLE WHO DO HAVE RESPONSIBILITY ARE
4 SIMPLY RECOGNIZED AS SUCH AND ARE REFERRED TO AS SUPERVISORS
5 BY THE PEOPLE THAT WORK UNDER THEM.

6 Q BUT YOU HAVE HEARD THE TERM "HIERARCH"?

7 A OH, YES, I HAVE HEARD THE TERM.

8 Q NOW, DID MR. MULL OF HIS OWN ACCORD WHILE YOU
9 WERE WORKING WITH HIM DETERMINE WHAT PROJECTS THE
10 ARCHITECTURAL DEPARTMENT WOULD WORK ON?

11 MR. KLEIN: I AM GOING TO OBJECT AS TO A LACK OF
12 FOUNDATION.

13 THE COURT: HE CAN ANSWER IF HE KNOWS.

14 THE WITNESS: I DON'T KNOW HOW THAT PROCESS WAS
15 INITIATED.

16 Q BY MR. LEVY: SO THAT I UNDERSTAND CORRECTLY,
17 YOU ARE SAYING THAT WHATEVER GREGORY MULL GAVE YOU TO WORK
18 ON, YOU WORKED ON. YOU HAD NO IDEA WHERE HE GOT THE
19 PROJECTS THAT YOU WERE TO WORK ON?

20 A WELL, I WOULDN'T SAY I HAD NO IDEA. I
21 UNDERSTOOD IT, YOU KNOW, FROM THIS BOOKLET AND, YOU KNOW, MY
22 GENERAL FAMILIARITY WITH THE CHURCH THAT THERE WERE CHURCH
23 PROJECTS AND THAT, YOU KNOW, I AM SURE THAT THEY WEREN'T HIS
24 IDEA OF WHAT, YOU KNOW, HE WOULD BE DOING JUST CARTE
25 BLANCHE.

26 I KNOW THAT ANY PROJECT REQUIRES LEADERSHIP,
27 AND DISCUSSION, AND PROJECT MANAGERS AND SO FORTH THAT
28 DESCRIBE WHAT THE PRIORITIES ARE, AND WHAT THE FINANCIAL

1 REALITIES ARE, AND WHAT NEEDS TO BE WORKED ON WHEN AND I WAS
2 NOT PRIVY TO THAT INFORMATION.

3 Q OKAY, MR. FUCCI, SO YOU WILL UNDERSTAND IT IS
4 NOT MY INTENT TO ATTACK YOU, IT IS MY INTENT TO FIND OUT.

5 WHAT I WANT TO FIND OUT IS DID SOMEONE TELL
6 GREGORY MULL WHAT TO DO WHEN HE WAS THERE?

7 A ARCHITECTURALLY?

8 Q YES, SIR.

9 A I WOULD ASSUME SO.

10 Q BY THE WAY, HAVE YOU EVER DESIGNED A BUILDING
11 FROM BEGINNING TO END AND HAVE THAT BUILDING ACTUALLY
12 CONSTRUCTED?

13 A YES.

14 Q DID YOU DO IT FOR THE CHURCH?

15 A NO.

16 Q DID YOU DO ANYTHING FOR THE CHURCH THAT WAS
17 ACTUALLY CONSTRUCTED?

18 A DO ANY -- YOU MEAN AS FAR AS ARCHITECTURAL
19 DRAFTING?

20 Q YES.

21 A I WORKED ON THINGS THAT WERE BUILT, YES.

22 Q WAS THAT LIKE SOME KIND OF REMODELING OF
23 SOMETHING THAT ALREADY EXISTED OR --

24 A YES.

25 Q OR MAYBE EVEN SOMETHING LIKE A WALL OR A
26 BUILDING THAT NO PERMIT HAD BEEN OBTAINED FOR?

27 A I COULDN'T SAY. THAT IS NOT -- WAS NOT MY
28 PROVINCE. I HAD NO INVOLVEMENT WITH THE PERMITS OR ANY OF

1 THE PROCESS. I WAS SIMPLY A DRAFTSMAN.

2 Q DID YOU LIVE ON CAMELOT PROPERTY DURING THAT
3 YEAR, 1979 AND 1980?

4 A NO, I DID NOT.

5 Q AND YOU -- WERE YOU STAFF THEN, PERMANENT OR
6 PROBATIONARY?

7 A I WAS WHAT IS CALLED VOLUNTEER STAFF AND I
8 LIVED CLOSE BY.

9 Q AS I UNDERSTAND YOU CORRECTLY, YOU SAID
10 SOMETIME TOWARD THE END OF MR. MULL'S STAY AT CAMELOT, YOU
11 WERE DOING SOME WORK FOR HIM AND HE WAS PAYING YOU \$10 AN
12 HOUR?

13 A YES.

14 Q AND YOU SEEM TO INDICATE THAT APPARENTLY THAT
15 WAS OKAY WITH HIERARCHY AT THE CHURCH?

16 A YES.

17 Q NOW, WHEN MR. MULL TALKED TO YOU ABOUT HIS
18 FEELINGS ABOUT THE CHURCH, HE WAS NOT CRITICAL OF THE
19 CHURCH, WAS HE?

20 A NO. HE WAS NOT. AND --

21 Q GO AHEAD. FINISH.

22 A WELL, I WAS -- AT THE TIME THAT HE LEFT, I
23 HAPPENED TO SHOW UP THAT DAY FOR WORK AND WAS SURPRISED TO
24 FIND OUT THAT, YOU KNOW, THAT HE WAS LEAVING. AND I ASKED
25 HIM WHAT WAS GOING ON.

26 AND THE RESPONSE, AS I RECALL, WAS THAT THE
27 OFFICE THAT HE WAS IN SAID HE WAS NEEDED FOR OTHER
28 PRIORITIES, AND THAT HE WAS GOING TO BE WORKING OUT OF HIS

1 CONDOMINIUM IN WESTLAKE AND I WOULD BE NOTIFIED WHEN TO
2 CONTINUE.

3 Q DID YOU KNOW THAT THE CHURCH HAD STOPPED PAYING
4 HIS MONTHLY EXPENSES?

5 A I HAD NO ACCESS TO INFORMATION LIKE THAT, NO.

6 Q DID YOU KNOW THAT HE HAD BEEN ASKED TO LEAVE
7 CHURCH PROPERTY?

8 A WELL, AS I SAID, APPARENTLY HE HAD.

9 Q DID IT STILL SURPRISE YOU AFTER THEY CUT OFF
10 HIS EXPENSE MONEY AND WAS ASKED TO LEAVE THAT HE WAS NOT
11 HOSTILE TO THE CHURCH?

12 MR. KLEIN: I AM GOING TO OBJECT AS ARGUMENTATIVE.

13 THE COURT: SUSTAINED.

14 Q BY MR. LEVY: DID MR. MULL APPEAR TO BE
15 DEDICATED TO ELIZABETH CLARE PROPHET?

16 A (NO AUDIBLE RESPONSE.)

17 Q SAY WITH THE SAME KIND OF ZEAL THAT YOU HAVE.

18 A ONE — I WOULDN'T ASSUME TO KNOW WHAT IS IN THE
19 HEART OF ANOTHER BEING. I CAN ONLY ASSESS WHO I AM WORKING
20 WITH BY THE FACT THAT THEY ARE THERE ON A CONTINUAL BASIS.
21 I DO NOT PUT A VALUE JUDGMENT ON THE LEVEL OF THEIR
22 COMMITMENT TO THE SAME GOALS THAT I HAVE.

23 I ASSUME THAT BY BEING IN THE COMMUNITY,
24 WORKING THERE AND DEDICATING HIS SERVICES TO THE CAUSE, AS
25 IT WERE, WAS EVIDENCE ENOUGH FOR ME THAT THERE WAS
26 COMMITMENT.

27 Q FAIR ENOUGH.

28 HAVE YOU GONE TO PRAYER MEETINGS AT THE CHURCH

1 WITHIN THE LAST SEVERAL WEEKS OR MONTH OR SO?

2 A YES.

3 Q IS THERE A THING CALLED THE WALL?

4 A A WALL? I AM NOT FAMILIAR WITH THAT TERM.

5 Q YOU KNOW THAT WALL BEHIND WHERE ELIZABETH
6 STANDS WHERE PEOPLE'S PICTURES ARE SOMETIMES PUT UP? THAT
7 WALL.

8 A WELL, THERE IS AN ALTER AND THERE IS A RAILING
9 IF THAT IS WHAT YOU ARE REFERRING TO.

10 Q IS THERE A PLACE AT THE CHURCH KNOWN AS THE
11 WALL WHERE PEOPLE WHO ARE PURPORTED TO BE ENEMIES OF THE
12 CHURCH HAVE THEIR PICTURE POSTED?

13 A NO. NO.

14 Q NO. YOU HAVE NEVER SEEN THAT?

15 A IT DOESN'T EXIST AS FAR AS I KNOW. I HAVE NOT
16 SEEN ANYTHING LIKE THAT AND I AM QUITE FAMILIAR WITH THE
17 CAMPUS.

18 Q ARE YOU AWARE THAT ALL THE PHOTOGRAPHS HAVE
19 BEEN TAKEN DOWN RECENTLY AND THE WALL HAS BEEN REPAINTED?

20 MR. KLEIN: I AM GOING TO OBJECT. THAT IS ASSUMING
21 FACTS NOT IN EVIDENCE. HE JUST SAID HE NEVER SAW ANY
22 PHOTOGRAPHS.

23 THE COURT: HE CAN ANSWER.

24 THE WITNESS: I AM SORRY. YOU WILL HAVE TO REPEAT
25 THE QUESTION. I DIDN'T UNDERSTAND WHAT YOU SAID.

26 Q BY MR. LEVY: OH, I THINK YOU DO.

27 BACK IN 1979 OR 1980, YOU HAD A PARTNER, AND
28 YOU WERE IN SALES AND YOU WERE SELLING ENERGY PRODUCTS?

1 A NO. IT WAS ACTUALLY OIL FUTURES.

2 Q OIL FUTURES. DID YOU APPROACH THE CHURCH FOR A
3 FINANCIAL SUPPORT IN YOUR VENTURE?

4 A NO, I DID NOT.

5 Q ISN'T IT A FACT, MR. FUCCI, YOUR PARTNER AND
6 YOURSELF APPROACHED THE CHURCH, AND THE CHURCH WAS SO
7 CONCERNED ABOUT THE PURCHASE OF THE INNER RETREAT THAT THEY
8 WERE NEGATIVE TO YOUR REQUEST FOR SUPPORT?

9 A EXCUSE ME, MR. LEVY. FIRST OF ALL, I WOULD
10 LIKE TO CORRECT A STATEMENT. THIS MAN THAT YOU ARE
11 REFERRING TO IS NOT MY PARTNER. I WORKED FOR HIM. AND THE
12 ANSWER TO YOUR QUESTION IS NO.

13 Q MR. KLEIN IS FOND OF ASKING THE QUESTION OF
14 WHETHER OR NOT ELIZABETH CLARE PROPHET MAKES MISTAKES. IF I
15 AM CORRECT, YOU TOLD US THAT MISS PROPHET HAS EVEN TOLD YOU
16 THAT SHE HAS MADE SOME MISTAKES.

17 IS THAT A FAIR STATEMENT?

18 A YES.

19 Q SHE ALSO ANALOGIZED THE TEACHINGS OF THE CHURCH
20 AS TO WHAT GOES AROUND COMES AROUND?

21 A SHE HASN'T. THOSE WERE MY WORDS.

22 Q THAT IS WHAT I SAID. YOU ANALOGIZED THE
23 TEACHINGS TO THAT?

24 A YES.

25 Q IN THOSE TEACHINGS, YOU EVER HEAR ABOUT DEMONS
26 AND DISCARNATES?

27 A YES.

28 Q PART OF THE TEACHINGS OF THE CHURCH INVOLVE

1 DEMONS AND DISCARNATES AND THOSE THINGS THAT CHURCH MEMBERS
2 MAY COME IN CONTACT WITH?

3 A WELL, WE REGARD -- I MEAN FOR LACK OF BETTER
4 TERMS, WE CALL THEM DEMONS AND DISCARNATES BASICALLY,
5 ENERGIES THAT ARE OF A DIFFERENT REALM. AND TO COME IN
6 CONTACT WITH THEM, IF YOU ARE IMPLYING PHYSICALLY, THERE IS
7 NO PHYSICAL CONTACT WITH SUCH ENTITIES.

8 WE RECOGNIZE THAT THERE ARE SPECIFIC FORMS OF
9 ENERGY THAT ARE MISQUALIFIED THAT WE REFER TO AS DEMONS AND
10 DISCARNATES AND ENTITIES.

11 Q AND THOSE PEOPLE WHO HAVE THOSE KIND OF THINGS,
12 THEY ARE FALLEN ONES, ARE THEY?

13 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THIS
14 LINE OF QUESTIONING AS TO RELEVANCE AND ALSO AS TO VIOLATING
15 FIRST AMENDMENT TO THE CONSTITUTION.

16 THE COURT: OVERRULED.

17 Q BY MR. LEVY: YOU EVER DECREE AGAINST PEOPLE,
18 MR. FUCCI?

19 A ABSOLUTELY NOT.

20 Q JUST THEIR ENERGY?

21 A I WOULDN'T SAY THEIR ENERGY. I WOULD SAY
22 THE -- IF THERE WAS ANY MALINTENT OR NEGATIVELY DIRECTED
23 ENERGY TOWARD MYSELF PERSONALLY OR TOWARD THE CHURCH, THAT
24 IT IS DEFENDED AND IS DEFENDED THROUGH THE FORM OF PRAYER
25 THAT WE ENGAGE IN. BUT NEVER TOWARD A PERSON PERSONALLY.

26 Q IS MY ENERGY PART OF ME?

27 A IS YOUR ENERGY PART OF YOU?

28 Q YES.

1 A I WOULD HOPE SO.

2 Q SO WHEN YOU DECREE, I HAVE HEARD A LOT OF TIMES
3 BY CHURCH MEMBERS SO FAR THAT THEY DECREE AGAINST ENERGY.
4 NOW YOU ARE TELLING ME MY ENERGY IS PART OF ME.

5 HOW -- IS THERE A WAY -- IS THERE A DOTTED LINE
6 THAT YOU CAN SEE ON ME, AND YOU JUST DECREE AGAINST THAT
7 PART ON THIS SIDE OF THE DOTTED LINE WHERE MY ENERGY IS AND
8 YOU DON'T DECREE AGAINST ME OVER HERE?

9 A WELL, PRETTY -- WELL, I THINK THAT, YOU KNOW,
10 WHAT YOU ARE SAYING IS YOU ARE TRYING TO -- I DON'T KNOW
11 WHAT YOU ARE TRYING TO DO.

12 Q WELL, WHY DON'T YOU HELP ME THEN. I AM TALKING
13 ABOUT ENERGY, AND IT BEING PART OF A PERSON AND THE CHURCH
14 DECREERING AGAINST PART OF THE PERSON.

15 MY QUESTION TO YOU IS DO YOU DECREE AGAINST
16 PEOPLE?

17 A NO.

18 Q HOW DO YOU SEPARATE WHICH PART IS THEIR ENERGY
19 PART AND WHICH PART IS THE REST OF THE PERSON?

20 A VERY SIMPLY. IF YOU WERE TO SUDDENLY
21 PHYSICALLY ATTACK ME, I WOULD DEFEND MYSELF. NOW YOU CAN
22 ATTACK ME WITH YOUR PHYSICAL BODY OR YOU CAN ATTACK ME WITH
23 YOUR ENERGY. AND IF YOU DO SO, I WOULD DEFEND MYSELF IN A
24 WAY THAT I KNOW HOW.

25 THAT DOESN'T MEAN THAT I WOULD HATE YOU AS A
26 PERSON OR I WOULD HAVE ANYTHING AGAINST YOU PERSONALLY. I
27 JUST DON'T WANT TO BE HURT.

28 Q I CAN APPRECIATE THAT, MR. FUCCI. I AM NOT

1 GOING TO ATTACK YOU. I HAVE NO REASON TO.

2 DID MR. MULL EVER ATTACK ANYBODY PHYSICALLY?

3 A NOT THAT I AM AWARE OF, NO. I HAVE NEVER SEEN
4 THAT.

5 Q DID HE EVER ATTACK YOU WITH HIS ENERGY?

6 A NOT THAT I AM AWARE OF, NO.

7 Q CAN YOU EXPLAIN TO ME WHY HIS NAME, AND HIS
8 PICTURE AND HE WAS DECREED AGAINST ON 24-HOUR TAG RECENTLY?

9 A YES, I CAN, MR. LEVY.

10 Q WOULD YOU PLEASE DO IT?

11 A I CERTAINLY WILL. BECAUSE HE HAS ATTACKED THE
12 CHURCH THAT I HAPPEN TO BELIEVE IN AND FEEL VERY STRONGLY.
13 AND THAT, TO ME, IS AN ATTACK ON ME PERSONALLY BECAUSE I AM
14 INVOLVED WITH THAT CHURCH.

15 Q HOW DO YOU ATTACK A CHURCH?

16 A WELL, HERE WE ARE, A LAWSUIT TO THE EFFECT OF
17 MILLIONS OF DOLLARS I WOULD CONSIDER AN ATTACK.

18 Q ARE YOU AWARE THAT MR. MULL DID NOT SUE THE
19 CHURCH FIRST, THAT THE CHURCH SUED HIM AFTER THEY PROMISED
20 NOT TO, AND IN RESPONSE TO THAT, HE ONLY CROSS-COMPLAINED?

21 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
22 THE RELEVANCY.

23 THE COURT: OVERRULED.

24 THE WITNESS: I WAS AWARE OF THE FACT THAT MR. MULL
25 HAS A GRIEVANCE AGAINST THIS CHURCH, AND HE'S EXPRESSED THAT
26 IN WRITTEN FORM, AND I'VE HEARD AND READ REPORTS IN
27 NEWSPAPERS AS TO HIS POSITION REGARDING OUR CHURCH AND OUR
28 COMMUNITY.

1 AND AS FAR AS THE FINANCIAL REALITIES OF WHAT
2 IS ACTUALLY ENGAGED IN, I AM NOT AGAIN PRIVY TO THAT KIND OF
3 INFORMATION.

4 Q BY MR. LEVY: DID YOU READ MR. FRANCIS'
5 ARTICLES IN THE PAPERS ALSO?

6 A I -- I DON'T REMEMBER READING AN ARTICLE BY MR.
7 FRANCIS.

8 Q WELL, YOU KNOW THE ONE WHERE HE CALLED A LOT OF
9 PEOPLE WHO WERE OUT OF THE CHURCH HOMOSEXUALS?

10 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THAT.
11 I THINK IT IS AN IMPROPER STATEMENT BY COUNSEL, AND I THINK
12 IT IS IMPROPER TO ASK THAT QUESTION AND WOULD ASK FOR AN
13 OFFER OF PROOF.

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

15 Q BY MR. LEVY: HAVE THE LEADERS OF THE CHURCH
16 DIRECTED YOU TO DECREE AGAINST GREGORY MULL?

17 A NO, THEY HAVE NOT.

18 Q HAVE THE LEADERS OF THE CHURCH AUTHORIZED
19 24-HOUR TAG DECREES AGAINST GREGORY MULL?

20 A NO, THEY HAVE NOT. AGAIN, YOU ARE USING THE
21 TERM AGAINST A PERSON. AND THAT IS NOT --

22 Q I SEE. THAT IS MY MISTAKE. WHAT ABOUT A
23 24-HOUR TAG DECREE WITH REGARD TO GREGORY MULL?

24 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
25 THE RELEVANCE, I AM GOING TO OBJECT UNDER THE FIRST
26 AMENDMENT TO THE CONSTITUTION.

27 THE COURT: OVERRULED.

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

1 A THERE ARE PRAYER SESSIONS AT OUR CHURCH
2 REGARDING THIS SITUATION.

3 Q WHAT YOU ARE TELLING ME THEN IS WHAT YOU GUYS
4 HAVE BEEN DOING IS YOU HAVE BEEN PRAYING FOR GREGORY MULL,
5 RIGHT?

6 A IN A SENSE, YES.

7 Q AND YOU HAVE BEEN PRAYING THAT THE OUTCOME FOR
8 HIM WILL BE FOR HIS BETTERMENT, WOULD THAT BE FAIR?

9 A MR. LEVY, I WOULD LIKE TO JUST, IF I MAY --
10 MR. KLEIN: YOUR HONOR, BEFORE THE ANSWER IS GIVEN,
11 AGAIN I WOULD OBJECT UNDER THE FIRST AMENDMENT TO THE
12 CONSTITUTION.

13 THE COURT: OVERRULED.

14 YOU CAN PROCEED.

15 Q BY MR. LEVY: DID YOU WANT TO RESPOND TO MY
16 QUESTION?

17 A YES. I AM IN THE PROCESS OF DOING THAT.

18 Q I DON'T MEAN TO BE RUDE TO YOU, MR. FUCCI, AND
19 I DON'T MEAN TO CUT YOU OFF, BUT I WANT TO GIVE YOU FULL
20 OPPORTUNITY TO RESPOND.

21 A I APPRECIATE THAT. IN OUR RELIGION, WE
22 RECOGNIZE THAT THERE IS A SUPREME WILL AND WE OPERATE WITHIN
23 THAT WILL. THE INTENT OF ANY PRAYER THAT WE PERPETRATE IS
24 TO INVOKE THAT WILL.

25 AND WE HAVE CALLED AND DO CALL FOR THE JUSTICE
26 IN THIS SITUATION TO REIGN SUPREME, AND THAT IS THE SUM AND
27 SUBSTANCE OF WHAT OUR PRAYING IS INTENDED TO ACCOMPLISH.

28 MR. LEVY: WELL, THEN YOU AND I ARE IN ACCORD. THAT

1 IS ALL WE ARE LOOKING FOR, MR. FUCCI, IS JUST A LITTLE
2 JUSTICE. I HAVE NOTHING FURTHER FOR YOU.

3 MR. KLEIN: JUST A FEW QUESTIONS, YOUR HONOR.

4 THE COURT: ALL RIGHT.

5

6 REDIRECT EXAMINATION +

7 BY MR. KLEIN:

8 Q YOU AT ONE POINT WHEN MR. LEVY WAS QUESTIONING
9 YOU SAID THERE MIGHT HAVE BEEN SOME OTHER PROJECT THAT YOU
10 WORKED ON WITH MR. MULL, BUT YOU CAN'T RECALL.

11 WOULD YOU HAVE WORKED ON ANY OTHER PROJECTS
12 FROM THAT TEN-YEAR CAMELOT PLAN?

13 A I -- NOTHING LISTED IN THIS PAGE, NO.

14 Q WHEN YOU SAY, "THIS PAGE," YOU ARE LOOKING AT
15 PAGE 32 OF EXHIBIT NUMBER 1?

16 A YES.

17 MR. KLEIN: THANK YOU.

18 I HAVE NO FURTHER QUESTIONS.

19 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

20 HAVE A NICE DAY, MR. FUCCI.

21 THE WITNESS: THANK YOU, MR. LEVY.

22 THE COURT: YOU ARE EXCUSED.

23 THE WITNESS: THANK YOU, YOUR HONOR.

24 THE COURT: WE WILL TAKE OUR MORNING RECESS AT THIS
25 TIME.

26 (RECESS.)

27 THE COURT: PLEASE PROCEED.

28 MR. KLEIN: THANK YOU, YOUR HONOR. LUCINDA MACY.

1 LUCINDA CLAIRE MACY, +
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: LUCINDA CLAIR MACY. L-U-C-I-N-D-A,
7 M-A-C-Y.

8 THE CLERK: MIDDLE NAME, ALSO.

9 THE WITNESS: C-L-A-I-R-E.

10

11 DIRECT EXAMINATION +

12 BY MR. KLEIN:

13 Q MISS MACY, PLEASE SPEAK INTO THAT MICROPHONE SO
14 WE WILL ALL BE ABLE TO HEAR YOU.

15 ARE YOU CURRENTLY A STAFF MEMBER AT CHURCH
16 UNIVERSAL AND TRIUMPHANT?

17 A YES, I AM.

18 Q HOW LONG HAVE YOU BEEN A STAFF MEMBER?

19 A I HAVE BEEN A STAFF MEMBER SINCE 1978. I LEFT
20 FOR A COUPLE OF YEARS FROM 1981 TO 1983.

21 Q WHEN YOU SAY YOU LEFT FOR A COUPLE OF YEARS
22 FROM '81 TO '83, WHY DID YOU LEAVE FOR THOSE YEARS?

23 A I — I HAD A THIRD —

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

25 THE COURT: SHE CAN ANSWER.

26 THE WITNESS: I HAD A THIRD CHILD, AND I WANTED TO
27 JUST BE A MOTHER AND NOT BE DOING OTHER WORK. I WANTED TO
28 JUST TAKE CARE OF MY CHILDREN.

1 Q BY MR. KLEIN: DID ANYONE AT THE CHURCH DO OR
2 SAY ANYTHING TO PREVENT YOU FROM LEAVING THE STAFF IN 1981?

3 A NO, THEY DIDN'T.

4 Q NOW, I'D LIKE TO DIRECT YOUR ATTENTION TO 1978.
5 AT THAT TIME WERE YOU LIVING AT CAMELOT?

6 A YES, I WAS.

7 Q DID YOU KNOW GREGORY MULL AT THAT TIME?

8 A IN 1978 I BELIEVE I MET HIM AT ONE TIME.

9 Q DID THERE COME A TIME IN '78 WHEN YOU MET HIM
10 AT CAMELOT?

11 A YES, UH-HUH.

12 Q WHAT HAPPENED AT THAT TIME?

13 A WE DISCUSSED HIM COMING TO CAMELOT, AND HAVING
14 AN ARCHITECTURAL DEPARTMENT, AND I WOULD BE HIS ASSISTANT
15 BECAUSE AT THE TIME I WAS WORKING ON ARCHITECTURAL DRAWINGS
16 AND BLUEPRINTS AND REMODELING PLANS FOR THE CONSTRUCTION
17 DEPARTMENT.

18 Q AND AS HIS ASSISTANT -- LET ME WITHDRAW THAT.
19 DID YOU IN FACT BECOME HIS ASSISTANT WHEN HE
20 CAME TO CAMELOT?

21 A YES, I DID.

22 Q NOW, IF HE CAME TO CAMELOT IN EARLY JANUARY OF
23 1979, WHEN DID YOU BECOME HIS ASSISTANT?

24 A I BECAME HIS ASSISTANT IN JANUARY OF 1979 WHEN
25 HE FIRST CAME.

26 Q AND IF I TOLD YOU HE LEFT CAMELOT IN
27 APPROXIMATELY MAY OF 1980, WERE YOU STILL HIS ASSISTANT AT
28 THAT TIME?

1 A I KNOW THAT I WAS STILL WORKING WITH HIM IN THE
2 END OF APRIL OF 1980.

3 Q AS HIS ASSISTANT, WHAT WAS YOUR DUTIES?

4 A I HAD A VARIETY OF THINGS. I DID RESEARCH, I
5 MADE PHONE CALLS, I DID DRAWINGS UNDER HIS INSTRUCTION, TOOK
6 MEASUREMENTS. I WAS SORT OF A SECRETARY, AN ASSISTANT IN
7 MANY DIFFERENT WAYS.

8 Q DID YOU WORK WITH HIM EVERY DAY?

9 A YES.

10 Q WAS HE YOUR BOSS?

11 A YES.

12 Q DID YOU HAVE A PARTICULAR OFFICE THAT YOU
13 WORKED IN?

14 A YES. I WORKED PRIMARILY IN HIS OFFICE WITH
15 HIM.

16 Q WAS THAT ALSO THE ROOM WHERE AT SOME POINT IN
17 TIME HE BEGAN SLEEPING IN?

18 A YES. THAT'S CORRECT.

19 Q WHEN HIS WIFE WAS LIVING AT CAMELOT, DID HE
20 SLEEP IN THAT ROOM, THE OFFICE ROOM, OR DID HE SLEEP
21 SOMEWHERE ELSE?

22 A NO. HE AND HIS WIFE HAD THEIR OWN ROOM ON
23 ANOTHER FLOOR OF THE BUILDING, AND HIS OFFICE WAS SEPARATE
24 FROM THAT.

25 Q AND AFTER HIS WIFE LEFT, DID THERE COME A TIME
26 WHEN HE BEGAN SLEEPING IN HIS OFFICE?

27 A YES. HE MOVED INTO HIS OFFICE.

28 Q DO YOU KNOW THE SIZE OF THAT OFFICE, THE

1 DIMENSIONS?

2 A YES. ONE OF THE THINGS THAT I DID WAS MEASURE
3 EVERY ROOM IN THE BUILDING AND I AM QUITE FAMILIAR WITH THE
4 SIZES OF THE ROOMS. AND IT WAS A TEN AND A HALF BY ELEVEN
5 AND A HALF. IT HAD A NINE FOOT CEILING.

6 Q DID HE HAVE A BED IN THAT OFFICE?

7 A YES, HE DID. HE MADE HIS BED, HIS OWN BED.

8 Q WHERE WAS THE BED?

9 A HE MADE A BED THAT WAS UNDER LIKE A LONG TABLE
10 AND HE USED A -- I BELIEVE IT WAS A PIECE OF PLYWOOD AND HE
11 PUT JUST A STANDARD MATTRESS FOR A BED ON TOP OF THAT. AND
12 THE PLYWOOD WAS ON CONCRETE BLOCKS SO IT WAS ABOUT A FOOT
13 OFF THE FLOOR.

14 Q WHO ELSE WAS IN THE ARCHITECTURAL DEPARTMENT IN
15 1979 AND 1980 DURING THE PERIOD MR. MULL WAS THERE?

16 A DONALD ANTHONY FUCCI AND CHARLES BRIGHT.

17 Q AND THEN IT WAS MR. MULL AND YOURSELF?

18 A YES.

19 Q NOW, WERE YOU AWARE OF ALL OF THE PROJECTS THAT
20 HE WAS WORKING ON?

21 A YES, I WAS.

22 Q AT THIS TIME I AM GOING TO SHOW THE WITNESS
23 WHAT HAS BEEN MARKED NUMBER 1 IN EVIDENCE.

24 DIRECT YOUR ATTENTION TO PAGE 32. LOOKING AT
25 PAGE 32, DO YOU SEE THE TEN-YEAR PLAN FOR CAMELOT?

26 A YES, UH-HUH.

27 Q ARE YOU FAMILIAR WITH THOSE PROJECTS?

28 A YES, I AM.

1 Q NOW, OF THOSE PROJECTS ON THE TEN-YEAR PLAN,
2 WHICH, IF ANY, DID THE ARCHITECTURAL DEPARTMENT OR MR. MULL
3 WORK ON DURING THE TIME HE WAS AT CAMELOT?

4 A THE ONE THAT IS ON HERE THAT WE WORKED ON WAS
5 THE MONTESSORI INTERNATIONAL, WHICH WAS AN UPPER AND LOWER
6 SCHOOL BUILDING.

7 Q PRIMARY AND SECONDARY SCHOOL?

8 A YES. AND THAT IS THE ONLY ONE THAT I SEE.

9 Q IF THERE WAS SOME OTHER PROJECT IN THAT
10 TEN-YEAR PLAN THAT MR. MULL WOULD HAVE WORKED ON AND DONE
11 DRAWINGS FOR, WOULD YOU HAVE KNOWN IT?

12 A YES, I WOULD HAVE.

13 Q WERE THERE TIMES THAT WHEN YOU WERE WORKING
14 WITH MR. MULL, THAT HE WOULD LEAVE THE CAMELOT CAMPUS?

15 A YES. HE LEFT IF HE NEEDED TO DO SOMETHING.
16 YOU KNOW, THERE WERE REASONS TO GO GET ARCHITECTURAL
17 DRAFTING SUPPLIES, MATERIALS, MAYBE TAKE MEASUREMENTS ON
18 ANOTHER PIECE OF PROPERTY. HE CAME AND WENT AS HE NEEDED
19 TO.

20 Q TO YOUR KNOWLEDGE, DID ANYONE CONTROL WHETHER
21 HE CAME -- WHEN HE CAME AND WHEN HE LEFT THE CAMPUS?

22 A NOT TO MY KNOWLEDGE.

23 Q WHILE HE WAS WORKING AT CAMELOT, DID THERE COME
24 A TIME WHEN MR. MULL BEGAN TO DO HIS OWN PRIVATE
25 ARCHITECTURAL WORK?

26 A YES. YES, THERE WAS. I CAN'T REALLY RECALL
27 EXACTLY WHEN HE BEGAN DOING THAT, BUT IT WAS -- I WOULD SAY
28 THAT HE STARTED WORKING FOR HIMSELF MAYBE HALF OF HIS TIME

1 AND HALF OF THE TIME FOR THE CHURCH PROJECTS.

2 Q AND TO YOUR — DO YOU KNOW WHETHER THE CHURCH
3 OFFICIALS KNEW THAT HE WAS WORKING ON HIS OWN PROJECTS?

4 A YES, THEY KNEW.

5 Q DID HE USE THE CHURCH PHONES, SWITCHBOARD FOR
6 HIS OWN PRIVATE CLIENT WORK?

7 A HE HAD HIS OWN PERSONAL PHONE IN HIS ROOM. AND
8 AS FAR AS I CAN RECALL, ALL THE CALLS THAT HE MADE FOR HIS
9 PERSONAL BUSINESS WERE ON HIS OWN PHONE.

10 Q DID YOU EVER WORK FOR HIM ON JOBS INVOLVING
11 PRIVATE CLIENTS?

12 A YES. HE HIRED ME TO HELP HIM ON SEVERAL OF HIS
13 JOBS.

14 Q NOW, DURING THE COURSE OF WORKING FOR MR. MULL,
15 DID YOU HAVE CONVERSATIONS WITH HIM?

16 A YES, UH-HUH.

17 Q ON NUMEROUS OCCASIONS?

18 A YES. WITH SOMEONE THAT YOU WORK WITH EVERY
19 DAY, YOU DISCUSS ALL SORTS OF DIFFERENT THINGS.

20 Q DID YOU EVER HAVE A DISCUSSION WITH HIM WHERE
21 HE DISCUSSED RECEIVING MONEY FROM THE CHURCH?

22 A YES. IT WAS COMMON KNOWLEDGE TO MYSELF AND THE
23 PEOPLE THAT HE WORKED WITH THAT HE WAS RECEIVING MONEY FROM
24 THE CHURCH TO COVER DEBTS THAT HE HAD AND HIS EXPENSES.

25 Q WHAT, IF ANYTHING, DID HE TELL YOU ABOUT THAT
26 MONEY?

27 A WELL, MY UNDERSTANDING WAS, AND THIS IS WHAT HE
28 TOLD ME, WAS THAT HE WAS BORROWING THIS MONEY. AND THAT

1 WHEN HE SOLD HIS HOUSE IN SAN FRANCISCO, HE WOULD BE PAYING
2 THE CHURCH BACK.

3 AND HE ASKED ME TO EVEN, YOU KNOW, HELP PRAY
4 FOR THE RIGHT PERSON TO COME TO BUY THE HOUSE SO THAT HE
5 COULD PAY THE CHURCH BACK.

6 Q DURING THE TIME THAT YOU WORKED WITH HIM FROM
7 '79 TO 1980, DID HE EVER COMPLAIN ABOUT LACK OF SLEEP?

8 A NO, I DON'T RECALL THAT. I RECALL THAT ON A
9 COUPLE OF OCCASIONS, LIKE HE SAID HE WAS TIRED AND HE WOULD
10 TAKE A NAP, YOU KNOW, TO REST IF HE NEEDED TO.

11 Q DID HE EVER TAKE A NAP DURING THE DAY THAT YOU
12 KNOW OF?

13 A YES. I CAN RECALL HIM DOING THAT. IT WASN'T
14 VERY OFTEN, BUT THERE WERE SEVERAL TIMES THAT HE DID.

15 Q DID YOU EVER HEAR HIM COMPLAIN ABOUT THE FOOD
16 AT CAMELOT?

17 A NO.

18 Q DID YOU EVER HEAR HIM COMPLAIN THAT HE WAS
19 BEING MANIPULATED AND CONTROLLED AT CAMELOT?

20 A NO.

21 Q DURING THE TIME THAT YOU -- DURING THE TIME
22 THAT YOU WORKED WITH HIM, DID HE EVER DO OR SAY ANYTHING TO
23 INDICATE THAT HE WAS BEING FORCED TO WORK MORE HOURS THAN HE
24 WANTED TO WORK?

25 A NO.

26 Q DID HE EVER SAY ANYTHING TO YOU TO INDICATE
27 THAT HE WASN'T HAPPY LIVING AT CAMELOT?

28 A NO. I NEVER PERCEIVED THAT FROM THE TIME HE

1 WAS THERE.

2 Q DID THERE COME A TIME IN APRIL OF 1980 WHEN YOU
3 DECIDED TO LEAVE THE ARCHITECTURAL DEPARTMENT?

4 A YES. IN THE -- TOWARDS THE END OF APRIL, I DID
5 HAVE A DISCUSSION WITH MR. MULL ABOUT -- THAT I HAD A DESIRE
6 TO WORK IN ANOTHER DEPARTMENT AND THAT I DIDN'T WANT TO
7 CONTINUE WORKING IN THE ARCHITECTURAL DEPARTMENT WITH HIM.

8 Q WHY DIDN'T YOU WANT TO CONTINUE WORKING WITH
9 HIM?

10 A I FOUND IT DISTRESSFUL AND STRESSFUL BECAUSE HE
11 HAD A LOT OF EMOTIONAL HIGHS AND LOWS.

12 Q WHAT DO YOU MEAN BY THAT?

13 A HE WOULD -- HE HAD A TEMPER AND HE'D GET ANGRY,
14 OR ELSE HE WOULD BE VERY SWEET, OVERLY SWEET, WOULD
15 VACILLATE FROM ONE EXTREME TO THE OTHER.

16 Q DURING 1979 TO 1980, DID YOU HAVE CHILDREN
17 WHILE YOU WERE LIVING AT CAMELOT?

18 A YES. I HAD A CHILD THAT WAS BORN IN MARCH OF
19 1979.

20 Q DID YOU HAVE ANY OTHER CHILDREN?

21 A I HAD A SON ALREADY.

22 Q AND WHY DON'T YOU GIVE US AN IDEA OF THE
23 TYPICAL DAY FOR YOU IN 1979 AT CAMELOT?

24 A WELL --

25 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION AS,
26 FIRST, ON RELEVANCE, SECOND, ON THAT IT IS AMBIGUOUS AND,
27 THIRD, THAT IT CALLS FOR A NARRATIVE AND, FOURTH, THAT ITS
28 SELF-SERVING.

1 THE COURT: SUSTAINED.

2 Q BY MR. KLEIN: WHAT TIME WOULD YOU GET UP WHEN
3 YOU LIVED AT CAMELOT IN 1979?

4 A ON THE AVERAGE, I'D SAY PRETTY MUCH ON A DAILY
5 BASIS I GOT UP BETWEEN 5:00 AND 5:30.

6 Q WHAT WOULD YOU DO WHEN YOU GOT UP? WHAT WOULD
7 BE THE FIRST THING YOU WOULD DO?

8 A I USUALLY SPEND SOMETIME BEFORE MY CHILDREN ARE
9 AWAKE DOING DEVOTIONAL PRAYERS AND DECREES FOR THE DAY.

10 Q WHAT -- WHAT DO DECREES MEAN TO YOU? WHAT ARE
11 THEY?

12 A DECREES FOR ME ARE -- IT IS A COMMUNION
13 WITH GOD, AND A COMMUNION THAT TIES ME INTO THE STRENGTH AND
14 WISDOM OF GOD WITHIN MYSELF, AND IT GIVES ME MENTAL CLARITY,
15 AND I FEEL THAT IT BRINGS WISDOM AND AN INTELLIGENCE TO
16 MYSELF TO HELP MAKE BETTER DECISIONS AND RUN MY LIFE IN A
17 MORE EFFECTIVE WAY.

18 Q DID YOU EVER FEEL THAT DECREERING IN ANY WAY
19 LESSENERED YOUR ABILITY TO CONTROL YOUR OWN THOUGHTS AND
20 ACTIONS?

21 A NO. IT IS THE OTHER WAY AROUND. THE DECREES
22 HELP ME CONTROL MY WORLD IN A WAY THAT IT MAKES IT MORE
23 EFFICIENT AND MORE EFFECTIVE.

24 Q GETTING BACK TO CAMELOT IN 1979, WHERE WOULD
25 YOU EAT?

26 A WHERE WOULD I EAT?

27 Q RIGHT. WHERE WOULD YOU EAT YOUR MEALS,
28 YOURSELF AND YOUR CHILDREN?

1 A YES. I WOULD EAT AT MY HOME OR I WOULD EAT AT
2 THE CAFETERIA.

3 Q WAS YOUR HOME ON THE CAMELOT CAMPUS?

4 A FOR A WHILE IT WAS ON THE CAMELOT CAMPUS AND
5 THEN WE EVENTUALLY MOVED TO AN APARTMENT.

6 Q WAS THAT A CHURCH-OWNED APARTMENT?

7 A YES, IT WAS A CHURCH-OWNED APARTMENT.

8 Q WHEN YOU LIVED ON THE CAMELOT CAMPUS, DID YOU
9 HAVE A REFRIGERATOR IN YOUR ROOM?

10 A YES, I DID.

11 Q WERE YOU ABLE TO PREPARE YOUR OWN MEALS FOR YOU
12 AND YOUR FAMILY IN YOUR ROOM WHEN YOU LIVED AT CAMELOT?

13 A WE DID NOT HAVE A KITCHEN IN OUR ROOM AT
14 CAMELOT. SO WE HAD REFRIGERATOR, HOT PLATE, TOASTER, THINGS
15 LIKE THAT. AND THAT WAS BASICALLY A TEMPORARY HOUSING
16 SITUATION UNTIL THE CHURCH COULD ACQUIRE MORE, YOU KNOW,
17 NORMAL HOUSING LIKE APARTMENTS.

18 Q NOW, YOU SAID THAT YOU WOULD DECREE. HOW MANY
19 HOURS A DAY WOULD YOU SPEND DECREEING?

20 A I WOULD SAY I WAS A MOTHER. AND WITH CHILDREN,
21 THAT MADE MY ROUTINE VARY ACCORDING TO THEIR NEEDS. BUT I
22 WOULD TRY AND MAYBE DECREE FOR AN HOUR IN THE MORNING AND AT
23 LUNCHTIME AND IN THE EVENING. IT IS LIKE A DAILY RITUAL OF
24 DEVOTION.

25 Q DID BEING A CHURCH MEMBER IN ANY WAY INTERFERE
26 WITH RAISING YOUR CHILDREN WHEN YOU LIVED THERE IN '79?

27 A NO. I CHOSE TO BE A CHURCH MEMBER AND BE IN
28 THE COMMUNITY BECAUSE THAT IS THE ENVIRONMENT THAT I WANTED

1 MY CHILDREN TO HAVE, THAT I COULD HELP CREATE AND THAT WOULD
2 BE PROTECTED FROM THINGS IN THE WORLD THAT I DIDN'T WANT
3 THEM EXPOSED TO SUCH AS DRUGS AND PORNOGRAPHY AND THINGS
4 THAT I WANTED TO SHELTER MY CHILDREN FROM.

5 Q WHEN YOU WORKED AT CAMELOT IN 1979, WHAT DID
6 YOU DO WITH YOUR YOUNGEST BABY, THE ONE THAT HAD JUST BEEN
7 BORN WHEN YOU WENT TO WORK?

8 A WHEN SHE WAS BORN, I SPENT JUST TIME WITH HER
9 FOR A WHILE. AND THEN WHEN I DID BEGIN GOING BACK TO WORK,
10 I TOOK HER WITH ME. I HAD HER WITH ME AND I KEPT HER UNTIL
11 I FELT THAT SHE WAS READY TO GO INTO A NURSERY SITUATION.

12 AND WHEN SHE WAS IN THE NURSERY SITUATION, I
13 STILL WENT AND NURSED HER AND TOOK CARE OF HER AS I NEEDED
14 TO THROUGHOUT THE DAY, BUT SHE ENJOYED BEING WITH HER PEERS.

15 Q WHEN YOU WERE PREGNANT IN 1979, DID YOU HAVE
16 ANY SPECIAL HEALTH NEEDS?

17 A WELL, WHEN YOU ARE PREGNANT, YOU DO HAVE
18 DIFFERENT HEALTH REQUIREMENTS. YOU NEED MORE PROTEIN.

19 Q AS FAR AS FOOD, WERE YOU ABLE TO GET IT?

20 A YES. BASICALLY ANY KIND OF A SPECIAL NEED FOR
21 FOOD WAS AVAILABLE UPON REQUEST.

22 Q AND WHEN YOU WERE PREGNANT IN 1979, DID YOU
23 REQUEST --

24 A YES, I --

25 Q LET ME FINISH MY QUESTION.

26 DID YOU REQUEST SOME KIND OF CHANGE IN DIET?

27 A YES. I ASKED TO HAVE PROTEIN EVERY DAY, TO
28 HAVE MEAT EVERY DAY, CARROT JUICE, ANYTHING THAT I FELT THAT

1 I WAS NEEDING.

2 Q DID YOU GET THE MEAT THAT YOU NEEDED THAT YOU
3 ASKED FOR?

4 A YES, I DID.

5 Q DO ANY OF YOUR CHILDREN HAVE ANY HEALTH NEEDS
6 THAT REQUIRE SPECIAL DIETARY --

7 A YES. MY SON IS DIABETIC AND HE HAS SPECIAL
8 DIETARY NEEDS, SPECIAL NEEDS AT EVERY MEAL THAT MAY BE
9 DIFFERENT FROM OTHER PEOPLE.

10 Q ARE THOSE TAKEN CARE OF BY THE CHURCH?

11 A YES.

12 Q WHAT IS THE ROLE OF ELIZABETH CLARE PROPHET AT
13 CHURCH UNIVERSAL AND TRIUMPHANT AND WHAT WAS HER ROLE IN
14 1979 TO 1980?

15 A WELL, SHE IS THE FOUNDER AND THE LEADER OF THE
16 CHURCH. AND TO ME, SHE IS A SPIRITUAL TEACHER, A FRIEND, A
17 WAY SHOWER ON THE PATH. AND I RESPECT HER, I RESPECT HER
18 POSITION. AND BECAUSE I DO, I TRUST IT.

19 Q HAS SHE TREATED YOU FAIRLY?

20 A SHE HAS BEEN VERY FAIR TO ME.

21 Q ARE ALL OF YOUR CHILDREN ATTENDING CHURCH
22 SCHOOLS?

23 A AT THIS TIME --

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

25 THE COURT: SUSTAINED.

26 Q BY MR. KLEIN: DURING THE TIME YOU HAVE BEEN
27 ASSOCIATED WITH THE CHURCH, HAVE YOU BEEN TAUGHT THAT YOU
28 CAN'T COMMUNICATE WITH PEOPLE WHO ARE NOT MEMBERS OF THE

1 CHURCH?

2 A NO. I COMMUNICATE WITH A LOT OF PEOPLE THAT
3 ARE NOT MEMBERS OF THE CHURCH.

4 Q HAS YOUR COMMUNICATION WITH NONMEMBERS EVER
5 BEEN RESTRICTED IN ANY WAY?

6 A NO.

7 Q WHILE YOU HAVE BEEN A MEMBER OF THE CHURCH,
8 HAVE YOU EVER BEEN TAUGHT THAT YOU SHOULD FEAR NONCHURCH
9 MEMBERS?

10 A NO.

11 Q HAVE YOU EVER BEEN TAUGHT THAT YOU CANNOT MAKE
12 YOUR ASCENSION IF YOU ARE NOT A MEMBER OF THE CHURCH?

13 A NO.

14 Q HAVE YOU EVER BEEN TAUGHT THAT YOU WILL DIE IF
15 YOU LEAVE THE CHURCH?

16 A NO. THE CHURCH JUST DOESN'T TEACH THINGS LIKE
17 THAT. THEY DON'T INSTRUCT PEOPLE ON WHAT -- WHAT TO DO IN
18 THOSE CASES. PEOPLE MAKE THEIR OWN INDEPENDENT DECISIONS
19 AND THEY HAVE THEIR OWN FEELINGS ABOUT THESE THINGS.

20 IF SOMEONE IS AFRAID, THEN THEY ARE AFRAID.
21 BUT NO ONE SAYS TO BE AFRAID OR NO ONE -- PEOPLE HAVE THEIR
22 OWN INDIVIDUAL FEELINGS.

23 Q YOU ARE A STAFF MEMBER AT THIS TIME?

24 A YES, I AM.

25 Q DO YOU FEEL THAT YOU ARE MANIPULATED OR
26 CONTROLLED IN ANY WAY BY ELIZABETH CLARE PROPHET OR OTHER
27 CHURCH OFFICIALS?

28 A NO, I DON'T. IF I DID, I WOULDN'T BE A STAFF

1 MEMBER.

2 Q IS THERE ANY DOUBT IN YOUR MIND AS TO WHETHER
3 YOU ARE MANIPULATED AND CONTROLLED IN YOUR DAILY LIFE OR IN
4 ANY OTHER WAY?

5 A NO. I LOOK AT MY DAILY LIFE AS MY FREE WILL
6 CHOICE, THAT THIS IS THE WAY I WANT TO LIVE, AND THAT IS WHY
7 I AM THERE AND I LOOK AT IT AS AN OPPORTUNITY.

8 Q DO YOU BELIEVE THAT YOU COULD LEAVE THE CHURCH
9 TODAY OR TOMORROW OR ANY TIME YOU WANTED IF YOU SO DESIRED?

10 A OH, YES, I COULD. IN FACT, YOU KNOW, I DID
11 WHEN I LEFT. I JUST MADE A DECISION THAT IT WAS TIME FOR ME
12 TO SPEND TIME JUST BEING A MOTHER.

13 Q BY THE WAY, YOU LEFT AND THEN YOU CAME BACK.
14 HOW DID IT COME ABOUT THAT YOU CAME BACK?

15 A WELL, WE HAD MOVED AWAY FROM THE L.A. AREA AND
16 MY CHILDREN, ON JUST ABOUT A DAILY BASIS, REQUESTED TO GO
17 SEE CAMELOT AND SEE THEIR FRIENDS. AND THEY MISSED THE
18 COMMUNITY, THEY MISSED THE SCHOOL. AND I DID, TOO. AND SO
19 I REQUESTED TO COME BACK AND I WAS WELCOMED BACK.

20 Q DURING THE YEARS YOU HAVE BEEN AFFILIATED WITH
21 THE CHURCH, HAVE YOU EVER HEARD ANY CHURCH OFFICIAL TELL ANY
22 CHURCH MEMBER TO HARASS, INTIMIDATE OR THREATEN SOME
23 EX-CHURCH MEMBER?

24 A NO, I HAVEN'T. I BELIEVE THAT IS AGAINST OUR
25 BELIEFS. WE JUST DON'T HARASS PEOPLE.

26 Q TO YOUR KNOWLEDGE, HAS ANY EX-CHURCH MEMBER
27 EVER BEEN HARASSED OR THREATENED OR INTIMIDATED AFTER THEY
28 LEFT THE CHURCH?

1 A NO, I AM NOT AWARE OF THAT.

2 Q WHEN YOU LEFT THE STAFF AND MOVED AWAY, DID
3 ANYBODY HARASS, INTIMIDATE OR THREATEN YOU?

4 A NO, THEY DIDN'T.

5 Q WHEN YOU LEFT AND MOVED AWAY, DID THE CHURCH
6 STAFF MEMBERS AVOID YOU OR SHUN YOU IN ANY WAY?

7 A NO.

8 Q ARE YOU CURRENTLY A MEMBER OF THE PROBATIONARY
9 STAFF?

10 A NO, I AM NOT.

11 Q ARE YOU A MEMBER OF THE PERMANENT STAFF?

12 A PARDON?

13 Q ARE YOU A MEMBER OF THE PERMANENT STAFF?

14 A NO.

15 Q HAS ANYBODY EVER PUT ANY PRESSURE ON YOU TO
16 JOIN THE PERMANENT STAFF OF THE CHURCH?

17 A NO. NO ONE EVER HAS. I HAVE APPLIED TO BECOME
18 PROBATIONARY STAFF OUT OF MY OWN DESIRE FOR GREATER SERVICE.
19 I HAVE BEEN A COMMUNITY MEMBER FOR A NUMBER OF YEARS THAT I
20 HAVE BEEN ON STAFF.

21 MR. KLEIN: THANK YOU VERY MUCH.

22 I HAVE NO FURTHER QUESTIONS.

23

24 CROSS-EXAMINATION +

25 BY MR. LEVY:

26 Q MISS MACY, DID YOU USED TO BE MISS MANN?

27 A YES, THAT'S CORRECT.

28 Q LUCINDA MANN.

1 Q LET'S SAY THEY MAKE THE DECISION, AND THEY DO
2 THAT AND THEY MOVE FROM A COMMUNITY MEMBERSHIP TO PERMANENT
3 STAFF.

4 A UH-HUH.

5 Q DO YOU KNOW WHAT THE RULES AND REQUIREMENTS ARE
6 ONCE YOU GO ON PERMANENT STAFF?

7 A NOT ENTIRELY BECAUSE I HAVE NEVER BEEN IN THAT
8 SITUATION. BUT --

9 Q WHY DON'T YOU TELL US THE BIT THAT YOU DO KNOW.

10 A IT IS SIMPLY A FURTHER COMMITMENT. AND, YOU
11 KNOW, LIKE IN OTHER RELIGIOUS ORGANIZATIONS WHEN YOU
12 BECOME -- MAKE THE COMMITMENT TO GOD AND GIVE YOUR LIFE TO
13 SERVICE, YOU GIVE UP YOUR WORLDLY POSSESSIONS IF YOU SO
14 CHOOSE TO DO BECAUSE YOU ARE GIVING YOUR LIFE TO GOD.

15 Q OKAY. AND WOULD IT BE A FAIR STATEMENT THAT
16 ELIZABETH CLARE PROPHET IS THE MESSENGER OF GOD; AND WHEN
17 YOU GIVE UP YOUR WORLDLY POSSESSIONS, THE TRANSFER IS MADE
18 TO HER AS THE AGENT OF WHOEVER IS UP THERE?

19 A NO. I WOULDN'T SAY THAT WAS A GOOD COMPARISON
20 AT ALL BECAUSE SHE IS NOT GOD IN THAT SENSE. YOU ARE GIVING
21 IT TO THE CHURCH AND THE CHURCH IS EVERYONE. IT IS THE BODY
22 OF GOD UPON EARTH AND THOSE THINGS GO TO THE CHURCH, NOT TO
23 ONE PERSON.

24 Q NOW, MR. KLEIN ASKED YOU ABOUT THAT BROCHURE.

25 A YES.

26 Q AND THE THINGS THAT WERE DONE THERE.

27 DID YOU FOLKS IN THE ARCHITECTURAL DEPARTMENT
28 WORK ON A 3,300 SEAT AUDITORIUM AS PART OF THE THINGS THAT

1 YOU DID?

2 A THERE WAS AN AUDITORIUM THAT WAS PART OF THE
3 MONTESSORI INTERNATIONAL COMPLEX. THAT IS HOW IT WAS BEING
4 WORKED ON.

5 Q I SEE.

6 A WAS THE CENTER OF IT.

7 Q DO YOU REMEMBER ANY WORK ON A GUARD GATE HOUSE?

8 A YES, UH-HUH.

9 Q WHAT ABOUT THE WILL OF GOD FOCUS?

10 A YES.

11 Q WHAT ABOUT HOUSING, WAS THERE ANY WORK DONE ON
12 HOUSING WHILE YOU WERE THERE?

13 A PART OF THE -- IF I RECALL, THE PART OF THE
14 MONTESSORI INTERNATIONAL COMPLEX HAD SOME HOUSING UNITS THAT
15 WE WERE ALSO WORKING ON.

16 Q WELL NOW, THE MONTESSORI WASN'T COMPLETELY
17 BUILT, WAS IT?

18 A THE MONTESSORI INTERNATIONAL PROJECT WASN'T
19 BUILT AT ALL.

20 Q WELL, THEN WHAT HOUSING WAS THAT THAT YOU WERE
21 WORKING ON OTHER THAN SOMETHING THAT WASN'T BUILT? YOU WERE
22 ACTUALLY DOING SOME PLANS ON SOMETHING ABOUT HOUSING?

23 A NO.

24 Q NO. DID YOU, WHILE YOU WERE WORKING THERE,
25 WORK ON AN OFFICE TOWER FOR ELIZABETH?

26 A NO.

27 Q YOU'VE TESTIFIED THAT YOU WERE AWARE OF ALL THE
28 PROJECTS THAT WAS WORKED ON WHILE YOU WERE WORKING AS MR.

1 MULL'S ASSISTANT.

2 A UH-HUH.

3 Q NOW, SO FAR I HAVE HEARD FROM YOU SOME WORK
4 ON -- NO WORK ON HOUSING AND SOME WORK ON THE 3,300 SEAT
5 AUDITORIUM?

6 A UH-HUH.

7 Q SOME WORK ON THE MONTESSORI SCHOOL, SOME WORK
8 ON A GUARDHOUSE, SOME WORK ON THE WILL OF GOD FOCUS.
9 ANYTHING ELSE THAT YOU CAN RECALL THAT YOU WORKED ON?

10 A WELL, WE DID SOME PLANS FOR AN EQUESTRIAN
11 SCHOOL. THESE WERE VERY ROUGH PRELIMINARY TYPE THINGS.
12 THERE WERE ALL KINDS OF VARIOUS REMODELING JOBS GOING ON ON
13 THE CAMPUS THAT WE WORKED ON AS THE NEED AROSE.

14 Q LET'S SEE. YOU WERE THERE FROM THE START OF
15 THE TIME THAT MR. MULL GOT THERE, SO THAT WOULD BE JANUARY
16 OF '79, AND I THINK YOU SAID YOU STOPPED WORKING THERE ABOUT
17 APRIL OF '80?

18 A YES. APRIL OF '80 IS THE LAST THAT I CAN
19 RECALL WORKING THERE.

20 Q SO THAT IS SOMETHING LIKE 14, MAYBE 15 MONTHS,
21 16 MONTHS?

22 A (NODS HEAD UP AND DOWN.)

23 Q NOW, WHILE YOU WERE THERE, DID YOU GUYS HAVE A
24 LOT OF TIME TO GOOF OFF OR WERE YOU WORKING ON CHURCH
25 PROJECTS?

26 A NO. WE WORKED ON CHURCH PROJECTS, DID
27 RESEARCH. YOU KNOW, THERE WAS A LOT OF RESEARCH THAT GO
28 INTO PRELIMINARY -- THEIR IDEAS. THERE ARE A LOT OF

1 RESEARCH THAT YOU HAVE TO DO TO BRING AN IDEA FORTH. YOU
2 ARE NOT JUST DRAWING ALL THE TIME.

3 Q I SEE. WAS THERE EVER A TIME THAT THE PEOPLE
4 WHO WORKED IN THAT DEPARTMENT, THE ARCHITECTURAL DEPARTMENT,
5 BECAME VERY CONCERNED ABOUT THEIR FINANCES AND MONEY?

6 A NOT THAT I RECALL.

7 Q DID YOU EVER HAVE TO TRY TO TALK TO EDWARD OR
8 MONROE OR ANYBODY, ANY OF THE HIERARCHS, ABOUT MAYBE TAKING
9 ON OUTSIDE WORK BECAUSE YOU GUYS WERE HURTING DOLLARWISE?

10 A WELL, FROM MY PERSONAL EXPERIENCE WAS THAT IF
11 THERE WAS A FINANCIAL NEED THAT WENT ABOVE WHAT YOU WERE,
12 YOU KNOW, DEALING WITH ON A DAILY BASIS, YOU SIMPLY STATED
13 THE NEED, THAT YOU NEEDED TO EARN OUTSIDE EXTRA MONEY, AND
14 YOU WENT OUT AND YOU EARNED IT.

15 Q THAT IS WHAT I AM ASKING ABOUT. DID A TIME
16 LIKE THAT COME ABOUT THAT YOU GUYS WERE NEEDING EXTRA MONEY?

17 A WHAT DO YOU MEAN BY "YOU GUYS"?

18 Q WELL, LIKE ALL THE PEOPLE WORKING IN THE
19 ARCHITECTURAL DEPARTMENT.

20 A WELL, DO YOU MEAN AS FOR PEOPLE PERSONALLY OR
21 FOR THE DEPARTMENT?

22 Q WELL, I GUESS PERSONALLY.

23 A WELL, I DIDN'T REALLY GET INVOLVED IN OTHER
24 PEOPLE'S PERSONAL LIVES, YOU KNOW. IF SOMEONE THAT WAS
25 WORKING IN -- IN MY OFFICE NEEDED TO WORK OUT, THEY WORKED
26 OUT, NO. I WASN'T REAL AWARE OF THEIR PERSONAL FINANCIAL
27 NEEDS.

28 MR. LEVY: NEXT IN ORDER IS --

1 MR. KLEIN: IT'S ALREADY MARKED.

2 MR. LEVY: I AM SORRY. I AM NOT AWARE THAT IT WAS
3 ALREADY MARKED.

4 Q LET ME SHOW YOU THIS. WOULD YOU TELL US WHAT
5 THAT IS, PLEASE, AFTER YOU HAVE A CHANCE TO READ IT?

6 THE COURT: DID YOU GIVE IT A NUMBER?

7 MR. LEVY: I DIDN'T. I WAS JUST INFORMED BY MR.
8 KLEIN AND THE GROUP OVER THERE THAT IT ALREADY HAD A NUMBER.

9 MR. MIDDLETON: WE DON'T KNOW WHAT THE NUMBER IS, BUT
10 IT'S BEEN USED EARLIER, YOUR HONOR. MR. KLEIN USED IT.

11 THE COURT: I CAN'T SEE IT.

12 THE WITNESS: WOULD YOU LIKE TO LOOK AT IT?

13 THE COURT: YES. LET ME SEE IT FOR A SECOND.

14 MR. LEVY: I AM NOT AWARE FOR SURE THAT IT HAS BEEN
15 USED.

16 MR. KLEIN: YOUR HONOR, IF I MAY, I BELIEVE THERE IS
17 A COPY OF IT THERE AND IT IS MARKED FOR IDENTIFICATION. I
18 DON'T KNOW WHETHER IT'S BEEN MARKED IN EVIDENCE.

19 THE COURT: WHAT NUMBER?

20 MR. KLEIN: THAT I CAN'T TELL YOU. I DIDN'T KNOW HE
21 WAS GOING TO USE IT UNTIL NOW.

22 MR. LEVY: I WILL FIND OUT DURING THE BREAK, YOUR
23 HONOR.

24 THE COURT: WHY DON'T WE RECESS NOW. WE WILL RESUME
25 AT 1:30 AND GET IT STRAIGHTENED OUT.

26 MR. LEVY: OKAY.

27 (AT 11:56 A.M., A RECESS WAS TAKEN UNTIL
28 1:30 P.M. OF THE SAME DAY.)

1 LOS ANGELES, CALIFORNIA; WEDNESDAY, MARCH 5, 1986 *

2 1:38 P.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 LUCINDA CLAIRE MACY, +

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

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

12 THE WITNESS: YES. MY NAME IS LUCINDA CLAIR MACY.

13 THE CLERK: THANK YOU.

14 THE COURT: PLEASE PROCEED.

15 MR. LEVY: THANK YOU, YOUR HONOR.
16

17 CROSS-EXAMINATION + (RESUMED)

18 BY MR. LEVY:

19 Q MISS MACY, WITHOUT APPEARING TO BE RUDE, I
20 NOTICE YOU BLINK YOUR EYES A LOT. ARE YOU ON ANY MEDICATION
21 OR ANYTHING FOR ANY KIND OF CONDITION?

22 A NO, I'M NOT.

23 Q NOW, BEFORE WE TOOK THE NOON BREAK, I WAS
24 ASKING YOU WITH REGARD TO THE FINANCIAL SITUATION OF YOUR
25 CO-WORKERS IN THE ARCHITECTURAL DEPARTMENT. AND IF I AM
26 CORRECT, YOU TOLD US THAT YOU DIDN'T MAKE INQUIRY INTO OTHER
27 PEOPLE'S FINANCIAL CONDITION, YOU DIDN'T FEEL THAT WAS
28 APPROPRIATE FOR YOU.

1 BUT SO FAR AS YOU WERE CONCERNED, THINGS WERE
2 WHAT, ADEQUATE AND NORMAL AND REASONABLE FOR YOURSELF?

3 A WELL, I -- I ALSO SAID THAT AT TIMES VARIOUS,
4 YOU KNOW, FINANCIAL NEEDS WOULD ARISE THAT YOU MIGHT WANT TO
5 TAKE CARE OF THAT WAS OUT OF THE ORDINARY.

6 Q NOW, WHEN SOME FINANCIAL NEED AROSE THAT YOU
7 MIGHT WANT TO TAKE CARE OF THAT WAS OUT OF THE ORDINARY, WAS
8 IT NECESSARY TO GO THROUGH YOUR HIERARCH TO TAKE CARE OF
9 THAT?

10 A YOU REQUESTED TIME TO GO OUT AND EARN MONEY IF
11 YOU NEEDED TO, YES. USUALLY THROUGH YOUR DEPARTMENT.

12 Q WOULD IT BE A FAIR STATEMENT THAT EVERYBODY IN
13 THE ARCHITECTURAL DEPARTMENT WHO WAS WORKING WITH MR. MULL
14 AT THAT TIME WAS IN SOME KIND OF FINANCIAL STRAITS?

15 A WELL, BY LOOKING AT THIS MEMO, YOU KNOW, GOING
16 BACK TO THAT TIME, I DO REMEMBER THAT WE ALL AGREED THAT WE
17 COULD HELP MR. MULL ON THE WORK THAT HE WAS GOING TO BE
18 DOING AND BENEFIT FROM IT.

19 THE COURT: LET ME SEE THAT, PLEASE. BY "THIS MEMO,"
20 THE WITNESS IS REFERRING TO EXHIBIT 56 FOR IDENTIFICATION.

21 Q BY MR. LEVY: NOW, DO I UNDERSTAND YOU
22 CORRECTLY THAT AT THAT TIME, EVERYBODY BELIEVED THEY COULD
23 HELP MR. MULL, AND SO THEY ALL GOT TOGETHER AND KIND OF
24 PITCHED IN AND THEY'D DO SOME OF HIS EXTRA WORK?

25 A YES. I DON'T ABSOLUTELY REMEMBER THE SPECIFIC
26 SITUATION.

27 Q WELL, WOULD YOU READ THAT MEMO?

28 A YES. I WILL READ THIS. THIS IS FROM THE

1 ARCHITECTURAL DEPARTMENT AND GREGORY MULL TO JAMES
2 MC CAFFREY, WHOM YOU'VE HAD TESTIMONY FROM. AND THE MEMO
3 READS: (READING.)

4 "EVERYONE IN THIS DEPARTMENT IS
5 IN NEED OF FINANCIAL INCOME AT THIS TIME.
6 WE WOULD LIKE TO TAKE AN OUTSIDE
7 ARCHITECTURAL -- TAKE IN OUTSIDE
8 ARCHITECTURAL WORK. WE MAY INSTALL -- MAY
9 WE INSTALL A PRIVATE PHONE HERE?

10 "THANK YOU FOR YOUR
11 CONSIDERATION OF THIS NEED."

12 AND IT IS SIGNED BY GREGORY MULL, MYSELF AND
13 CHARLES BRIGHT.

14 Q IS THERE A NOTATION?

15 A THERE IS A NOTATION OVER HERE THAT IT SAID:
16 (READING.)

17 "OKAY IF YOU COORDINATE WITH
18 DAVID ZETER," WHO WAS A MAN THAT WORKED WITH
19 OUR PHONES ON THE CAMPUS. "I AM NOT SURE
20 MORE LINES ARE POSSIBLE."

21 AND THEN IT HAS JAMES' INITIALS.

22 Q AND JAMES WOULD BE WHO?

23 A JAMES MC CAFFREY, WHO THE MEMO IS ADDRESSED TO.

24 Q NOW, WITH REGARD TO THE FIRST SENTENCE IN
25 THERE, WOULD I BE CORRECT IN ASSUMING THAT IT WASN'T JUST
26 GREGORY MULL THAT WAS HAVING PROBLEMS SINCE YOU SIGNED YOUR
27 NAME AND IT SAYS "EVERYONE IN THIS DEPARTMENT" IS HAVING A
28 PROBLEM? I ASSUME YOU READ IT BEFORE YOU SIGNED IT.

1 A IT DOESN'T SAY EVERYONE IS HAVING A PROBLEM.
2 IT SAYS THEY HAVE A FINANCIAL NEED OF INCOME AT THIS TIME.

3 Q WELL, I CATEGORIZE A FINANCIAL -- A NEED OF
4 FINANCIAL INCOME AS A PROBLEM. WHEN I DON'T HAVE MONEY, I
5 CONSIDER IT A PROBLEM.

6 A UH-HUH.

7 Q WERE YOU IN FINANCIAL NEED AT THAT TIME?

8 A WELL, I ASSUME I WAS OR I WOULDN'T HAVE SIGNED
9 THE MEMO.

10 Q NOW, YOU TOLD US BEFORE THAT YOU NOTICED MR.
11 MULL AND HE WAS HAVING EMOTIONAL HIGHS AND LOWS?

12 A UH-HUH.

13 Q DID HE HAVE EMOTIONAL HIGHS AND LOWS TO ANY
14 OBSERVABLE DEGREE WHEN HE FIRST CAME TO CAMELOT IN JANUARY
15 OF 1979?

16 A WELL, I WOULD JUST SAY THAT WAS HIS
17 PERSONALITY, AND THAT HE WOULD BE OVEREXUBERANT AND HAVE A
18 LOT OF PRAISE; OR IF SOMETHING DISSATISFIED HIM, THEN HE
19 MIGHT GET ANGRY ABOUT IT.

20 Q NOW, HAVE YOU HAD ANY TRAINING IN PSYCHOLOGY OR
21 SOCIOLOGY OR PSYCHIATRY?

22 A NO, I HAVEN'T.

23 Q WOULD THERE BE ANY WAY THAT YOU WOULD KNOW
24 WHETHER OR NOT SOMEBODY WAS EMOTIONALLY DISTURBED?

25 A NO.

26 Q BY OBSERVING EMOTIONAL HIGHS AND LOWS?

27 A NO. I WOULD NOT BE TRYING TO SPEAK FROM A
28 PROFESSIONAL TERM IN ANY WAY.

1 Q I REALIZE I HAVE BEEN ASKING THE WRONG
2 QUESTION. I HAVE SAID THINGS LIKE DO YOU DECREE AGAINST
3 PEOPLE.

4 WHEN YOU DECREE, WHAT IS IT YOU DECREE FOR?

5 A WELL, PRIMARILY WE DECREE FOR THE WILL OF GOD
6 TO BE DONE IN ANY GIVEN SITUATION, AND WE INVOKE THE LIGHT
7 AND PRESENCE OF GOD INTO SITUATIONS FOR THEIR RESOLVING.

8 Q NOW, YOU DECREE FOR LOVE AND KINDNESS AND
9 CHARITY?

10 A WE DECREE FOR HEALING, WE DECREE FOR WORLD
11 CONDITIONS WHERE THERE IS FAMINE OR CATASTROPHE. EVERY TIME
12 THAT A DECREE IS SENT FORTH, IT IS DONE IN LOVE.

13 Q WHEN YOU START A DECREE AND YOU TALK ABOUT
14 TAKING DOMINION OVER SOMETHING, WHAT DOES THAT MEAN?

15 A IT IS SIMPLY TAKING TO -- YOU ARE ASKING GOD TO
16 TAKE HIS COMMAND OVER THE GIVEN SITUATION SO THAT IT IS IN
17 GOD'S HANDS AND NOT IN, YOU KNOW, PEOPLE'S HANDS OR HANDS
18 THAT ARE NOT GOD'S WILL.

19 Q WHAT YOU ARE DOING THEN, IF I UNDERSTAND YOU
20 CORRECTLY, IS YOU ARE JUST RELINQUISHING ALL OF THE
21 RESPONSIBILITY TO GOD THEN?

22 A WELL, NOT EXACTLY. I CONSIDER THAT IT IS MY
23 RESPONSIBILITY TO BE AWARE OF SITUATIONS THAT ARE HARMFUL TO
24 MY FAMILY, MANKIND. I CONSIDER MYSELF RESPONSIBLE FOR
25 CONDITIONS ON THE PLANET. AND I AM AWARE THAT GOD IS THE
26 GREATEST POWER THAT THERE IS, AND IT IS MY RESPONSIBILITY TO
27 CALL FORTH GOD AND DIVINE ENERGIES TO INTERCEDE IN
28 SITUATIONS FOR THEIR RESOLVING.

1 Q HAVE YOU EVER HEARD THAT OLD -- IT IS KIND OF
2 AN OLD SAW -- IT GOES LIKE GOD HELPS THOSE THAT HELP
3 THEMSELVES?

4 A I DON'T RECALL THAT AS A SONG.

5 Q NOT SONG. SAW, S-A-W, LIKE AN OLD ADAGE OR
6 AXIOM OR SAYING?

7 A YES, I HAVE HEARD THAT.

8 Q IN YOUR CHURCH WHEN YOU ASK GOD TO TAKE OVER,
9 DO YOU ALSO HAVE AN OBLIGATION YOURSELF TO DO THINGS?

10 A YOU'D HAVE TO EXPLAIN THAT FURTHER. I DON'T
11 THINK I UNDERSTAND.

12 Q WELL, I CAN APPRECIATE WHEN YOU PRAY, YOU PRAY
13 TO GOD TO HELP YOU?

14 A UH-HUH.

15 Q PART OF YOUR PRAYER THAT YOU WILL BE ABLE TO
16 HELP YOURSELF ALSO?

17 A WELL, I THINK I AM HELPING MYSELF BY PRAYING,
18 BY TAKING THE ACTION, OR MAKING THE CALL AND PUTTING MY
19 HEART AND MY ENERGY INTO A SITUATION. I AM BEING
20 RESPONSIBLE AND I AM TRYING TO DO SOMETHING.

21 Q NOW, THE DECREES THAT YOU DO, LIKE WHEN AS AN
22 INSERT AND THE HIERARCHS PASS OUT SOMETHING --

23 A COULD YOU EXPLAIN WHAT YOU MEAN BY "HIERARCH"?

24 Q YOU NEVER HEARD THE TERM BEFORE?

25 A WELL, I HAVE HEARD IT, BUT HIERARCHS -- I DON'T
26 KNOW WHAT YOU MEAN BY THAT IN OUR COMMUNITY.

27 Q WE HAVE HEARD TESTIMONY BY OTHER PEOPLE THAT
28 THAT IS A WORD THAT IS SOMETIMES USED. AS A MATTER OF FACT,

1 IT IS USED QUITE OFTEN. ELIZABETH CLARE PROPHET USED THE
2 TERM "HIERARCH" AND THE GENTLEMAN WHO WORKED IN YOUR
3 ARCHITECTURAL DEPARTMENT REMEMBERED THE WORD "HIERARCH."

4 A WHEN I HEARD HERE THE WORD "HIERARCH," I FEEL
5 THAT IT REFERS TO THE HEAVENLY HOST, YOU KNOW, ARCHANGELS
6 AND NOT PEOPLE.

7 Q WASN'T EDWARD FRANCIS AND MONROE SHEARER
8 REFERRED TO AS HIERARCHS IN YOUR CHURCH?

9 A WELL, I WOULD CONSIDER THEM DEPARTMENT HEADS,
10 SUPERVISORS, PEOPLE ON THE BOARD.

11 Q WAS "HIERARCH" NOT TERMINOLOGY THAT WAS
12 EMPLOYED WHILE YOU WERE ACTIVELY ENGAGED IN THE
13 ARCHITECTURAL DEPARTMENT?

14 A I HAVE NOT USED THAT IN THAT WAY MYSELF.

15 Q DID YOU EVER HEAR IT USED BY EITHER -- BY
16 ANYONE THAT WAS WORKING IN THE DEPARTMENT OR BY ANYBODY WHO
17 SUPERVISED THAT DEPARTMENT?

18 A NOT IN THAT CONTEXT.

19 Q IN ANY CONTEXT?

20 A WELL, LIKE I SAID, REFERRING TO HEAVENLY REALMS
21 MORE THAN TO PEOPLE.

22 Q AND IF SOMEBODY WERE TO USE THE TERM "HIERARCH"
23 WITH REGARD TO MR. EDWARD FRANCIS, THAT WOULD BE A HEAVENLY
24 REALM AS OPPOSED TO THIS GENTLEMAN HERE?

25 A IF SOMEONE ELSE WANTED TO USE THAT TERM THAT
26 WAY -- I AM TELLING YOU HOW I INTERPRET IT AND HOW I WOULD
27 USE IT. I AM NOT GOING TO SPEAK FOR SOMEONE ELSE.

28 Q WHAT I AM TRYING TO FIND OUT, IF IT WAS COMMON

1 TERMINOLOGY AT CAMELOT WHILE YOU WERE WORKING THERE IN THE
2 ARCHITECTURAL DEPARTMENT?

3 A I COULDN'T SAY THAT IT WAS.

4 Q WAS IT USED ON OCCASION?

5 A WELL, IT COULD HAVE BEEN.

6 Q ARE YOU TELLING THE COURT THAT YOU HAVE NO
7 RECOLLECTION THAT THE TERM WAS USED WHILE YOU WERE IN THAT
8 DEPARTMENT?

9 MR. KLEIN: I AM GOING TO OBJECT. THAT
10 MISCHARACTERIZES WHAT SHE JUST SAID, YOUR HONOR.

11 THE COURT: OVERRULED.

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

13 A SOMEONE COULD HAVE USED IT, YOU KNOW. I AM NOT
14 GOING TO SAY THAT NO ONE USED THAT TERM BECAUSE I SIMPLY
15 CAN'T SPEAK FOR OTHER PEOPLE.

16 Q HOW ABOUT JUST SPEAKING FOR YOURSELF.

17 A I DID NOT USE THAT TERM IN THAT WAY.

18 Q BUT HEAR OTHER PEOPLE IN THAT DEPARTMENT AND
19 WITHIN THE CHURCH USE THE TERM "HIERARCH" WHILE YOU WERE
20 WORKING IN THE ARCHITECTURAL DEPARTMENT OR AFFILIATED WITH
21 THE CHURCH?

22 A I DON'T HAVE A MEMORY OF THEM DOING THAT.

23 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

24 MR. KLEIN: THANK YOU, YOUR HONOR.

25

26 REDIRECT EXAMINATION +

27 BY MR. KLEIN:

28 Q YOU TALKED DURING MR. LEVY'S QUESTIONING ABOUT

1 SOME WORK BEING DONE ON SOME HOUSING.

2 WAS THERE SOME WORK DONE ON HOUSING WHILE MR.
3 MULL WAS IN THE ARCHITECTURAL DEPARTMENT?

4 A THE -- THE HOUSING WORK THAT I CAN RECALL WAS
5 DONE -- WE WERE WORKING ON TRYING TO USE SOME SURPLUS
6 BUILDINGS THAT HAD BEEN OBTAINED FROM THE STATE. AND THEY
7 WERE LIKE PREFABRICATED BUILDINGS, AND WE WERE TRYING TO
8 FIGURE OUT HOW WE COULD USE THEM FOR HOUSING AND
9 INCORPORATING THEM IN THE MONTESSORI PLAN.

10 Q THAT WAS MY QUESTION. WAS THE HOUSING
11 WHATEVER, YOU DID WITH IT, WAS A PART OF THE MONTESSORI
12 PROJECT?

13 A YES.

14 Q DID THERE COME A TIME WHEN THEY ABANDONED THE
15 HOUSING PROJECT?

16 A YES. MY LAST RECOLLECTION OF TRYING TO UTILIZE
17 THOSE BUILDINGS WAS PUTTING THEM TO USE AS A EQUESTRIAN
18 SCHOOL.

19 Q AND YOU ALSO TESTIFIED IN ANSWER TO ONE OF MR.
20 LEVY'S QUESTIONS ABOUT SOME WORK BEING DONE ON THE
21 EQUESTRIAN SCHOOL. IS THAT THE EQUESTRIAN SCHOOL YOU WERE
22 REFERRING TO?

23 A YES.

24 Q AND YOU TESTIFIED ABOUT A 3,300 SEAT AUDITORIUM
25 WHEN MR. LEVY WAS QUESTIONING YOU. WAS THAT PART OF
26 MONTESSORI?

27 A YES. THAT WAS THE -- THERE WAS AN AUDITORIUM
28 AND THEN THE SCHOOLROOMS WERE GOING TO BE BUILT AROUND IT.

1 SO IT WAS AN AUDITORIUM FOR THE SCHOOL.

2 Q DID THAT AUDITORIUM HAVE TO DO WITH ANY OF THE
3 OTHER PROJECTS THAT ARE LISTED ON THAT TEN-YEAR CAMELOT
4 PLAN?

5 A WELL, IT WAS PART OF THE MONTESSORI
6 INTERNATIONAL SCHOOL AND THAT'S IT.

7 Q OTHER THAN THE MONTESSORI PROJECT, DID IT HAVE
8 TO DO WITH ANY OTHER PROJECTS LISTED ON THAT TEN-YEAR PLAN?

9 A NO.

10 Q MR. LEVY ASKED YOU IF MR. -- IF YOU WORKED ON
11 AN OFFICE TOWER.

12 A YES.

13 Q AND YOU SAID YOU DIDN'T.

14 A I DIDN'T ACTUALLY WORK ON THAT.

15 Q WAS THERE AN OFFICE TOWER THAT MR. MULL WORKED
16 ON?

17 A YES. WHEN I REFERRED TO THE OFFICE TOWER, I
18 WAS REFERRING TO AN EXISTING BUILDING THAT WAS BEING
19 REMODELED.

20 Q SO IT WASN'T BUILDING AN OFFICE TOWER, IT WAS
21 REMODELING A BUILDING THAT ALREADY EXISTED?

22 A YES, THAT'S RIGHT.

23 Q AND DID THAT REMODELING OF THAT OFFICE TOWER,
24 DID THAT HAVE ANYTHING TO DO WITH ANY OF THE PROJECTS LISTED
25 IN THE TEN-YEAR CAMELOT PLAN?

26 A NO, IT DIDN'T.

27 Q MR. LEVY ASKED YOU ABOUT BLINKING YOUR EYES A
28 LOT. DID YOU HAVE SOME PROBLEM, A PERSONAL PROBLEM LAST

1 NIGHT?

2 A YES. I WAS UP ALL NIGHT WITH A SICK CHILD SO I
3 AM A LITTLE TIRED THIS MORNING.

4 Q TO YOUR KNOWLEDGE, WERE ANY OF MR. MULL'S OR
5 THE ARCHITECTURAL DEPARTMENT'S DRAWINGS EVER USED FOR FUND
6 RAISING?

7 A NO, THEY WERE NOT.

8 Q WERE THERE EVER PLANS TO DO SO?

9 A YES. WE WORKED ON ONE LARGE DRAWING. IT WAS
10 JUST SOMETHING DONE FOR DISPLAY LIKE AN AREA VIEW OF THE
11 SCHOOL THAT WE COLORED IN. IT LOOKED NICE AND THIS WAS
12 INTENDED TO BE USED DURING A RELIGIOUS CONFERENCE FOR PUBLIC
13 DISPLAY. BUT IT WAS NEVER USED.

14 Q DO YOU KNOW WHY IT WASN'T USED?

15 A IT WAS NOT USED BECAUSE THE BOARD OF DIRECTORS
16 NEVER GAVE IT FINAL APPROVAL TO BE USED.

17 MR. KLEIN: THANK YOU.

18 NO FURTHER QUESTIONS.

19 MR. LEVY: JUST A FEW, YOUR HONOR.

20

21 RE-CROSS-EXAMINATION +

22 BY MR. LEVY:

23 Q WITH REGARD TO FUND RAISING, MISS MACY, WAS
24 THERE EVER A TIME THAT GREGORY MULL TOOK SOME OF HIS PLANS
25 AND WENT TO A CONFERENCE AND EXPLAINED HIS PLANS AT THE
26 CONFERENCE TO THE PEOPLE WHO ATTENDED THAT CONFERENCE?

27 A I AM NOT AWARE OF THAT IF THAT HAPPENED. I
28 HAVE NO RECOLLECTION OF THAT.

1 Q DID THE BOARD OF DIRECTORS AND THE EXECUTIVE
2 COMMITTEE DISCUSS WITH YOU WHAT THEY WOULD USE PLANS FOR
3 WITH REGARD TO FUND RAISING?

4 A I DON'T UNDERSTAND THAT.

5 Q DID THE BOARD OF DIRECTORS EVER SEEK OUT YOUR
6 ADVICE AND COUNSEL WITH REGARD TO WHAT THEY WOULD DO IN THE
7 WAY OF FUND RAISING WITH MR. MULL'S PLANS?

8 A NO.

9 Q SO YOUR CONCLUSION THAT HIS PLANS WERE NEVER
10 USED IS JUST TO YOUR LIMITED KNOWLEDGE; IS THAT NOT CORRECT?

11 A WELL, I BELIEVE AT THE TIME WE ALL WORKED ON
12 THE PROJECT AND WE WERE ALL ANTICIPATING IT BEING USED, BUT
13 IT WAS NOT APPROVED BY THE BOARD OF DIRECTORS AND THAT WAS
14 STATED. I DON'T KNOW WHY.

15 Q AND WHO WAS IT WHO STATED THAT TO YOU?

16 A I DON'T RECALL. IT WAS SOMEONE IN OUR
17 DEPARTMENT.

18 Q ONE LAST QUESTION. DID THE BOARD OF DIRECTORS
19 EVER SEEK YOUR ADVICE AND COUNSEL AS TO WHAT THEY WOULD DO
20 IN ORDER TO RAISE FUNDS?

21 A NO, THEY DIDN'T.

22 Q AND YOU HAVE NO -- I TOLD A FIB. ONE MORE LAST
23 QUESTION.

24 YOU DON'T KNOW WHETHER MR. MULL'S PLANS WERE
25 USED PRIVATELY OR PUBLICLY OR ANY OTHER WAY FOR FUND
26 RAISING, DO YOU?

27 A WELL, I LIVED AND WORKED IN THE COMMUNITY AND
28 WAS INVOLVED IN THE DEPARTMENT. AND IF THEY WOULD HAVE BEEN

1 PUT ON DISPLAY, I WOULD HAVE BEEN AWARE OF IT BECAUSE I WAS
2 THERE.

3 Q WELL, WHAT YOU HAVE DONE NOW IS CONFUSE ME
4 BECAUSE YOU TELL ME THAT THE BOARD DIDN'T SEEK YOUR ADVICE
5 AND COUNSEL; AND THAT WITH REGARD TO ONE PROJECT YOU WORKED
6 ON WITH MR. MULL, THAT WAS NOT USED.

7 AND THEN I ASKED YOU WHETHER OR NOT YOU HAD AN
8 ABSOLUTE KNOWLEDGE AS TO WHETHER MR. MULL'S PLANS WERE EVER
9 USED AT ANY TIME FOR FUND RAISING.

10 NOW AM I CORRECT THAT IS JUST AN ASSUMPTION ON
11 YOUR PART THAT THEY WERE NOT, OR DO YOU HAVE ABSOLUTE
12 KNOWLEDGE THAT HIS PLANS WERE NEVER USED FOR FUND RAISING?

13 MR. KLEIN: OBJECTION. IT IS A COMPOUND QUESTION,
14 YOUR HONOR.

15 THE COURT: SHE CAN ANSWER.

16 THE WITNESS: YES. I AM GETTING A LITTLE CONFUSED BY
17 THIS.

18 Q BY MR. LEVY: I DON'T DOUBT THAT.

19 A I DON'T THINK THAT I HAVE MADE MYSELF CLEAR
20 PERHAPS. BUT I -- ALL I KNOW IS THAT THIS ONE PROJECT THAT
21 WE WORKED ON THAT WAS DONE FOR PUBLIC DISPLAY TO PRESENT TO
22 PEOPLE, THIS PLAN WAS NOT USED. I MEAN I COLORED IT IN, I
23 SPENT A LONG TIME ON IT, AND IT WAS NOT USED AND I KNEW
24 ABOUT IT BECAUSE I WAS VERY INVOLVED IN THE PROJECT.

25 Q OTHER THAN THAT ONE THING THAT YOU COLORED IN,
26 DO YOU HAVE AN ABSOLUTE KNOWLEDGE THAT MR. MULL'S PLANS WERE
27 NEVER USED FOR FUND RAISING?

28 A NO, I WILL NOT SAY THAT I DO.

1 MR. LEVY: OKAY. THANK YOU.

2 I HAVE NOTHING FURTHER, YOUR HONOR.

3

4 FURTHER REDIRECT EXAMINATION +

5 BY MR. KLEIN:

6 Q DURING 1979 TO 1980, DID YOU ATTEND ALL THE
7 CHURCH CONFERENCES?

8 A YES, I DID. I WAS A STAFF MEMBER SO I ACTIVELY
9 WAS INVOLVED IN EVERY CONFERENCE.

10 Q AT ANY CONFERENCE DURING 1979 AND 1980, DID YOU
11 SEE ANY ARCHITECTURAL PLAN DISPLAYED?

12 A NO, I DID NOT.

13 MR. KLEIN: THANK YOU.

14 NO FURTHER QUESTIONS.

15 MR. LEVY: ONE OR TWO MORE, YOUR HONOR.

16

17 FURTHER RECROSS-EXAMINATION +

18 BY MR. LEVY:

19 Q NOW, YOU TESTIFIED BEFORE THAT YOU WERE NOT A
20 STAFF MEMBER, YOU WERE A COMMUNITY MEMBER. NOW, DO YOU NOW
21 HAVE A DIFFERENT RECOLLECTION? WERE YOU STAFF OR WERE YOU A
22 COMMUNITY WORKER?

23 A I NEVER SAID I WAS NOT A STAFF MEMBER. I SAID
24 I WAS NOT PROBATIONARY OR PERMANENT STAFF.

25 Q WHAT OTHER CATEGORIES OF STAFF MEMBERS ARE
26 THERE?

27 A WELL, COMMUNITY MEMBER IS STILL A STAFF MEMBER.
28 WE STILL WORK ON THE STAFF OF THE COMMUNITY.

1 Q YOU DIDN'T EXPLAIN THAT TO ME BEFORE. YOU ARE
2 SAYING AS A COMMUNITY MEMBER THEN, YOU CONSIDERED YOURSELF
3 ON STAFF?

4 A THAT'S CORRECT.

5 Q NOW, DID YOU EVER ATTEND WITH ELIZABETH ANY
6 PRIVATE FUNCTIONS THAT MIGHT HAVE BEEN HAD IN ORDER TO RAISE
7 FUNDS?

8 A WHAT DO YOU MEAN BY "PRIVATE FUNCTIONS"?

9 Q WHERE JUST ORDINARY GUYS LIKE ME WOULD BE
10 THERE.

11 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
12 AMBIGUOUS, YOUR HONOR.

13 THE COURT: SHE CAN ANSWER.

14 THE WITNESS: I AM STILL NOT CLEAR AS TO WHAT YOU ARE
15 SAYING.

16 Q BY MR. LEVY: WELL, AT SOME FUNCTION WHERE ALL
17 OF THE COMMUNITY PEOPLE AND AFFILIATES AND COMMUNICANTS AND
18 MEMBERS AND PEOPLE WHO ARE ON THE MAILING LIST AND ALL THE
19 OTHERS WOULDN'T BE THERE, ARE THERE EVER FUNCTIONS THAT
20 ELIZABETH WOULD HOLD THAT YOU WEREN'T INVITED TO?

21 A THAT WERE FUND RAISING FUNCTIONS?

22 Q THAT MAY HAVE BEEN FUND RAISING.

23 A THERE COULD HAVE BEEN, BUT I AM NOT AWARE OF
24 THEM.

25 Q THERE IS PROBABLY A LOT OF THINGS THAT WENT ON
26 THAT YOU WERE NOT AWARE OF, WOULD THAT BE A FAIR STATEMENT?

27 A WELL, I AM NOT GOING TO SPEAK ABOUT THINGS THAT
28 I DON'T KNOW ABOUT.

1 MR. LEVY: THANK YOU VERY MUCH, MA'AM.

2 NOTHING FURTHER, YOUR HONOR.

3 MR. KLEIN: NOTHING FURTHER, YOUR HONOR.

4 THE COURT: YOU ARE EXCUSED.

5 MR. KLEIN: MR. DOUGLAS KENYON, YOUR HONOR.

6

7 JOHN DOUGLAS KENYON, +

8 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,

9 TESTIFIES AS FOLLOWS:

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

11 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL
12 YOUR NAME.

13 THE WITNESS: JOHN DOUGLAS KENYON, K-E-N-Y-O-N.

14 THE CLERK: YOUR FIRST NAME AND YOUR MIDDLE NAME,
15 TOO.

16 THE WITNESS: JOHN DOUGLAS KENYON.

17 THE CLERK: PLEASE SPELL IT.

18 THE WITNESS: JOHN, J-O-H-N; DOUGLAS, D-O-U-G-L-A-S.

19 THE CLERK: THANK YOU.

20

21 DIRECT EXAMINATION +

22 BY MR. KLEIN:

23 Q MR. KENYON, ARE YOU PRESENTLY EMPLOYED?

24 A YES, I AM.

25 Q WHAT DO YOU DO?

26 A I AM A P.R. MARKETING CONSULTANT.

27 Q P.R. IS PUBLIC RELATIONS?

28 A YES.

1 Q ARE YOU CURRENTLY A CHURCH STAFF MEMBER?

2 A NOT A STAFF MEMBER, NO.

3 Q ARE YOU CURRENTLY A CHURCH MEMBER?

4 A YES.

5 Q HAVE YOU SERVED IN THE MILITARY?

6 A YES, I HAVE.

7 Q WERE YOU HONORABLY DISCHARGED?

8 A YES.

9 Q DO YOU KNOW MR. GREGORY MULL?

10 A I'VE SEEN HIM.

11 Q WERE YOU LIVING IN CAMELOT IN THE YEARS 1979
12 THROUGH 1981?

13 A YES, I WAS.

14 Q NOW, I WANT TO DIRECT YOUR ATTENTION TO A
15 SUNDAY IN APRIL OF 1981, DID YOU HAVE OCCASION TO BE PRESENT
16 IN THE VICINITY OF THE ENTRANCE GATE --

17 A YES.

18 Q -- TO THE CAMELOT PROPERTY?

19 A YES.

20 Q WHERE WERE YOU?

21 A THERE IS A GUARD POST, A FRONT GATE SITUATION.
22 I WAS IN PROBABLY WITHIN 10 OR 15 FEET OF IT.

23 Q AND IS THAT GUARD POST, IS THAT RIGHT NEXT TO
24 THE ENTRANCE TO CAMELOT, OR IS THERE SOME DISTANCE BETWEEN
25 THE ENTRANCE GATE AND THE GUARD POST?

26 A THE ENTRANCE GATE IS PROBABLY ABOUT -- ABOUT A
27 QUARTER OF A MILE NORTH OF THE BOX THAT I AM TALKING ABOUT.

28 Q SO FIRST YOU WOULD GO IN THE ENTRANCE GATE, AND

1 YOU WOULD GO APPROXIMATELY A QUARTER OF A MILE AND THEN YOU
2 WOULD COME TO THIS GUARDHOUSE THAT YOU WERE BY?

3 A RIGHT.

4 Q NOW, ON THIS SUNDAY IN APRIL OF 1981, DO YOU
5 RECALL WHY IT WAS THAT YOU WERE IN THE VICINITY OF THAT
6 GUARD POST?

7 A YES. IT WAS MY -- OR HAD BEEN MY
8 RESPONSIBILITY TO DEAL WITH THE PRESS ON -- AND WE
9 ANTICIPATED ON THAT PARTICULAR DAY THAT WE MIGHT HAVE PRESS
10 ON HAND INASMUCH AS WE WERE HAVING A PUBLIC EVENT. AND
11 PAULA ZARZYCKI HAD ASKED ME TO COME DOWN THERE JUST IN CASE
12 THERE WERE, THAT I COULD HELP ANSWER QUESTIONS.

13 MR. LEVY: I WILL OBJECT TO THE RESPONSE, YOUR HONOR,
14 AS -- I WILL WITHDRAW THE OBJECTION.

15 Q BY MR. KLEIN: WAS PAULA ZARZYCKI ANOTHER STAFF
16 MEMBER?

17 A YES.

18 Q SHE WORKED WITH YOU ON THE PUBLIC RELATIONS
19 BOARD?

20 A YES.

21 Q WHAT WAS THE EVENT THAT WAS GOING TO OCCUR ON
22 THAT DAY THAT YOU REFERRED TO?

23 A A SQUARE DANCE. IT HAD BEEN -- IT WAS OPEN TO
24 THE PUBLIC AND HAD BEEN ADVERTISED DURING THE PREVIOUS WEEK.

25 Q DID THERE COME A TIME ON THAT DATE WHEN GREGORY
26 MULL CAME TO CAMELOT?

27 A YES.

28 Q WAS HE A STAFF MEMBER OF THE CHURCH AT THAT

1 TIME?

2 A NO, HE WAS NOT.

3 Q WAS HE A MEMBER OF THE CHURCH AT THAT TIME?

4 A NO, HE WAS NOT.

5 Q COULD YOU TELL US WHAT HAPPENED WHEN HE CAME TO
6 THE CAMELOT PROPERTY ON THAT DATE?

7 A WE -- THOSE OF US AT THE -- WHO WERE IN THE
8 VICINITY OF THE BOX THAT I MENTIONED --

9 Q WHY DON'T YOU TELL US WHO THE "WE" WAS. WHO
10 WAS IN THE VICINITY OF THE BOX WHEN THEY CAME?

11 A THERE WAS MYSELF, EUGENE GARCIA, WHO WAS KIND
12 OF THE ATTENDANT THERE, AND THEN THERE WAS PAULA ZARZYCKI,
13 SUSAN MC ADAMS AND A GRACE MC GUIRE. THAT WAS BASICALLY IT.

14 Q OKAY. AND WHAT HAPPENED THEN? DID THERE COME
15 A TIME WHEN YOU SAW MR. MULL COMING IN?

16 A YES. THEY WERE COMING IN THE FRONT GATE. IT
17 WAS UNUSUAL BECAUSE THEY WERE COMING IN ON FOOT. ORDINARILY
18 PEOPLE DRIVE IN. AND HE WAS NOT ALONE. HE WAS WITH A GROUP
19 OF PEOPLE AND THEY WERE WALKING IN.

20 Q AND WHAT HAPPENED THEN?

21 A WELL, WE RECOGNIZED THEM, OF COURSE. THERE
22 WERE -- HE WAS ACCOMPANIED BY A COUPLE OF OTHERS WHO HAD
23 BEEN, AS WE NOW KNEW, HOSTILE TO THE CHURCH. AND SO WE
24 CALLED ED FRANCIS AND LET HIM KNOW THAT -- WHAT WAS
25 HAPPENING.

26 Q WHEN YOU SAY, "A COUPLE OF OTHERS," WERE THERE
27 ANY NEWSPAPER REPORTERS WITH HIM?

28 A THERE WAS, YES.

1 Q DID YOU RECOGNIZE THAT NEWSPAPER REPORTER?

2 A I DIDN'T MYSELF, BUT IT WAS POINTED OUT TO ME
3 BY ONE OF THE OTHERS WHO WAS WITH ME WHO IT WAS. AND I KNEW
4 THE NAME.

5 Q OKAY. YOU SAID YOU CALLED ED FRANCIS?

6 A YES.

7 Q THEN WHAT HAPPENED?

8 A HE HAD WALKED DOWN TO THE GATE AND HE WAS
9 ACTUALLY WALKING TO THE GUARD BOX AT THE SAME TIME THAT THE
10 OTHERS WERE STILL WALKING UP FROM THE OTHER DIRECTION. SO
11 THEY WERE BOTH APPROACHING THE GUARD BOX AT THE SAME TIME.

12 Q FOR CLARITY, TRY TO USE THE NAMES EITHER ED
13 FRANCIS OR MR. MULL SO THAT WE UNDERSTAND WHO THE "HE IS"
14 ARE.

15 A OKAY. AS MR. MULL AND HIS PARTY WERE
16 APPROACHING THE POST, ED BY HIMSELF WAS WALKING DOWN FROM
17 THE OTHER DIRECTION. THEY WERE BOTH -- WE COULD SEE THEM
18 BOTH ARRIVING AND THEY BOTH GOT TO THE AREA AT THE SAME
19 TIME.

20 Q OKAY. HOW MANY PEOPLE WERE WITH MR. MULL, DO
21 YOU RECALL?

22 A WELL, HE -- HE HAD HIS DAUGHTER WITH HIM, AND
23 THERE WAS THE REPORTER FROM THE LAS VIRGENES ENTERPRISE, ONE
24 OTHER INDIVIDUAL, AND MR. AND MRS. MARILYN MALEK OR MR. AND
25 MRS. MALEK.

26 Q OKAY. NOW, ONCE MR. MULL AND HIS PARTY AND MR.
27 FRANCIS REACHED THE GUARD POST --

28 A UH-HUH.

1 Q -- THEN WHAT HAPPENED?

2 A THERE WAS A BRIEF -- WELL, THERE WAS A QUERY AS
3 TO WHAT WAS ACTUALLY -- WHAT HIS PURPOSE WAS IN BEING THERE.
4 AND MR. MULL ANNOUNCED THAT HE HAD COME TO THE DANCE AND
5 THAT HE MADE A COUPLE OF OTHER REQUESTS.

6 I THINK HE SAID -- SOMETHING TO THE EFFECT
7 THAT -- I THINK HE SAID HE HAD COME IN PEACE, OR SOMETHING
8 LIKE THAT, AND THAT HE WANTED TO -- HE JUST WANTED TO DANCE,
9 HE AND HIS GROUP DID. THAT WAS TAKEN TO BE DISINGENUOUS.
10 SO BASICALLY HE HAD TOLD HIM THAT HE WAS SORRY, THAT HE
11 WOULD NOT BE PERMITTED TO DO SO.

12 Q WHAT HAPPENED NEXT?

13 A THERE WAS BASICALLY AN ARGUMENT, WHICH IN --
14 WHICH A NUMBER OF THE OTHER POINTS AT ISSUE WERE -- CAME UP.
15 I DON'T REMEMBER SPECIFICALLY WHAT WAS SAID. JUST THAT
16 CLAIMS WERE MADE BY MR. MULL AS TO WHAT HIS RIGHTS WERE, AND
17 WHAT WAS GOING ON AND BASICALLY WAS PRETTY ACRIMONIOUS ON
18 HIS PART.

19 THE MAIN THING THAT I REMEMBER IS THAT AT SOME
20 POINT IN THE CONVERSATION, HE MADE SOME RATHER NEGATIVE --

21 Q WHO IS "HE"?

22 A MR. MULL MADE SOME NEGATIVE REMARKS ABOUT GRACE
23 MC GUIRE AND -- BECAUSE HE APPARENTLY KNEW HER AND CHOSE THE
24 OCCASION TO PUT HER DOWN ABOUT HER CHOICE OF RELIGION.

25 Q WAS SHE ONE OF THE CHURCH MEMBERS THAT WAS AT
26 THAT -- IN THAT VICINITY?

27 A THAT'S RIGHT.

28 Q THEN WHAT HAPPENED?

1 A WELL, AFTER THAT WENT ON, AFTER A WHILE HE --
2 MR. MULL AND HIS GROUP GAVE UP AND TURNED AND LEFT. THOUGH
3 NOT WITHOUT -- THE MAIN THING I REMEMBER ABOUT THEIR EXIT
4 WAS THAT MR. MULL KEPT LOOKING BACK AND SHOUTING SOMETHING
5 TO THE EFFECT OF, "GOD WILL JUDGE YOU," AND BASICALLY HE WAS
6 VERY -- HE WAS ANGRY TO THE POINT THAT HE WAS ACTUALLY
7 JUMPING UP AND DOWN.

8 AND THIS IS BASICALLY THE WAY HE MADE HIS EXIT.
9 THERE WERE A LOT OF SHOUTS OF THAT NATURE.

10 Q NOW, DURING THE COURSE OF THE TIME WHEN MR.
11 MULL AND MR. FRANCIS WERE TALKING, DID ANY OTHER CHURCH
12 PEOPLE JOIN THE ONES THAT YOU'VE ALREADY TOLD US WERE THERE?

13 A NONE THAT I RECALL.

14 MR. KLEIN: YOUR HONOR, AT THIS POINT I WOULD ASK
15 THAT THIS CHART BE MARKED NUMBER 111 FOR IDENTIFICATION.

16 THE COURT: SO MARKED FOR IDENTIFICATION.

17 (MARKED FOR ID: ^ EXHIBIT 111, CHART)

18 Q BY MR. KLEIN: LOOKING AT WHAT HAS BEEN MARKED
19 NUMBER 111 FOR IDENTIFICATION, DO YOU RECOGNIZE WHAT THAT
20 DEPICTS?

21 A YES.

22 Q WHAT IS THAT?

23 A THAT IS THE AREA AT THE ENTRANCE AT CAMELOT.

24 Q AND PERHAPS YOU CAN -- WITH THE COURT'S
25 PERMISSION, THE WITNESS MIGHT STAND AND I WOULD ASK HIM SOME
26 QUESTIONS ABOUT THAT CHART.

27 THE COURT: VERY WELL.

28 Q BY MR. KLEIN: NOW, WHERE WOULD THE FRONT GATE

1 BE WHERE SOMEBODY WOULD ENTER THE CAMELOT PROPERTY? WHERE
2 WOULD THAT BE, CAN YOU SHOW US?

3 A RIGHT HERE (POINTING). IT IS ON MULHOLLAND
4 HIGHWAY.

5 Q DOES IT SAY ANYTHING ON THAT CHART AS TO WHERE
6 YOU JUST POINTED? WHAT DOES IT SAY?

7 A IT SAYS "FRONT GATE."

8 Q NOW, WHERE WOULD THE GUARD POST BE THAT YOU
9 REFERRED TO?

10 A RIGHT HERE (POINTING.). THERE IS NO NAME ON
11 IT, BUT IT IS THIS AREA DIRECTLY HERE.

12 Q THERE IS A PEN THERE. MAYBE YOU CAN PUT A G.P.
13 RIGHT BY THAT GUARD POST SO THAT WE WILL KNOW WHERE IT IS.

14 A (MARKING.)

15 Q DID YOU PUT IT SORT OF ABOARD THE GUARD POST?

16 A YES. RIGHT THERE (POINTING) AND THERE IS THE
17 GUARD POST DIRECTLY BENEATH IT.

18 Q NOW, THERE CAME A TIME WHEN -- WELL, WHEN MR.
19 MULL AND MR. FRANCIS BOTH WERE STANDING IN THE VICINITY OF
20 THAT GUARD POST?

21 A UH-HUH.

22 Q AS BEST YOU CAN, CAN YOU SHOW US WHERE MR. MULL
23 WOULD HAVE BEEN STANDING AND WHERE MR. FRANCIS WOULD HAVE
24 BEEN STANDING WHEN THEY FIRST MET, AS IT WERE?

25 A APPROXIMATELY IN THIS AREA HERE (POINTING).
26 MR. MULL WOULD HAVE BEEN ROUGHLY THERE AND MR. FRANCIS WOULD
27 HAVE BEEN JUST A FEW FEET AWAY COMING FROM THE OTHER
28 DIRECTION.

1 Q WHY NOT PUT AN "M" WHERE MR. MULL WOULD HAVE
2 BEEN STANDING AND AN "F" WHERE MR. FRANCIS WOULD HAVE BEEN
3 STANDING.

4 A (MARKING).

5 Q NOW, WHERE WERE YOU STANDING WHEN THEY FIRST
6 CONFRONTED EACH OTHER?

7 A IN THIS VICINITY HERE (POINTING).

8 Q WHY DON'T YOU PUT A "K" FOR KENYON IN THE
9 GENERAL AREA WHERE YOU WERE STANDING.

10 A ALL RIGHT. (MARKING).

11 Q NOW, WAS THERE SOMEBODY WHO WAS ASSIGNED TO BE
12 IN THAT GUARDHOUSE ON THAT DATE?

13 A THAT IS CORRECT.

14 Q WHO WAS THAT?

15 A EUGENE GARCIA.

16 Q WHERE WAS HE WHEN MR. FRANCIS AND MR. MULL
17 FIRST BEGAN TO SPEAK?

18 A I CAN'T BE TOTALLY PRECISE. HE WAS IN THE
19 VICINITY. HE PROBABLY WAS NOT DIRECTLY IN THE BOOTH AT THE
20 TIME, BUT SOMEWHERE AROUND THERE.

21 Q NOW, THERE WERE SOME WOMEN THAT YOU TOLD US
22 ABOUT WHO WERE ALSO THERE FROM THE CHURCH?

23 A THAT'S RIGHT.

24 Q WITHOUT DRAWING IT, I DON'T WANT TO GET IT TOO
25 CLUTTERED WITH NAMES AND INITIALS, BUT CAN YOU SHOW THE JURY
26 APPROXIMATELY WHERE THESE WOMEN WERE WHEN THIS INCIDENT
27 BEGAN WITH MR. MULL AND MR. FRANCIS CONFRONTING EACH OTHER?

28 A ALL THREE -- PAULA ZARZYCKI, SUSAN MC ADAMS AND

1 GRACE MC GUIRE -- WERE IN ROUGHLY THE SAME AREA ALONG WITH
2 ME. IT IS POSSIBLE SOME OF THEM WERE OVER IN THIS AREA. I
3 CAN'T REMEMBER EXACTLY HOW THEY WERE POSITIONED.

4 Q FOR THE RECORD, YOU HAVE SORT OF DRAWN A LITTLE
5 CIRCLE INVOLVING THE GUARD POST, THE "K" AND THE "F" FOR MR.
6 FRANCIS.

7 IS THAT THE GENERAL AREA WHERE THE WOMEN WERE?

8 A THAT'S RIGHT.

9 Q NOW, MAYBE YOU CAN ALSO TELL US -- AGAIN
10 WITHOUT DRAWING IT, BUT USING THE POINTER -- IN GENERAL
11 WHERE WERE THE OTHER PEOPLE WHO HAD ACCOMPANIED MR. MULL
12 WHEN MR. FRANCIS AND MR. MULL WERE DIRECTLY OPPOSITE EACH
13 OTHER?

14 A THEY WERE PRETTY MUCH STANDING BEHIND HIM AND
15 TO HIS LEFT AND HIS RIGHT. I DO RECALL THAT THE REPORTER
16 FROM THE ENTERPRISE WAS MOVING AROUND QUITE A BIT. EITHER
17 HE OR THE OTHER FELLOW WHO I THINK ACCOMPANIED HIM, I AM
18 SURE HAD A CAMERA, I AM NOT SURE WHO IT WAS SO HE WAS
19 RUNNING AROUND SNAPPING PICTURES.

20 SO THERE WAS THAT GOING ON, WHICH WAS IN THIS
21 AREA (POINTING).

22 Q OKAY. NOW, AT THIS POINT I AM GOING TO SHOW
23 YOU WHAT HAVE ALREADY BEEN MARKED FOR IDENTIFICATION EXHIBIT
24 90, 88, AND 87.

25 NOW, LOOKING AT THE EXHIBIT PICTURE ON THE
26 BOTTOM, WHAT IS THAT?

27 A ON THE BOTTOM, THIS ONE?

28 Q YES. THAT IS NUMBER 87 FOR IDENTIFICATION.

1 A THAT IS AN OUTSIDE VIEW OF THE FRONT GATE HERE
2 (PPOINTING). THAT IS LOOKING IN FROM MULHOLLAND HIGHWAY INTO
3 THE GATE. AND YOU CAN SEE THE ROAD THAT YOU SEE THROUGH THE
4 GATE GOING BETWEEN THE EUCALYPTUS TREES, THERE IS THIS ROAD
5 LEADING ALONG THIS DIRECTION (POINTING).

6 Q FOR THE RECORD, YOU ARE POINTING DOWN THE ROAD
7 TOWARDS THE GUARD POST?

8 A THAT'S RIGHT, TOWARDS THE GUARD POST AND
9 TOWARDS THE MAIN CAMPUS.

10 Q IS THAT A FAIR AND ACCURATE REPRESENTATION OF
11 THAT OUTSIDE GATE?

12 A YES..

13 Q THE ONE IMMEDIATELY ABOVE THAT, NUMBER 88 FOR
14 IDENTIFICATION, WHAT IS THAT A PICTURE OF?

15 A THAT IS A VIEW OF THE GUARD POST FROM CLOSER
16 BY. AFTER HAVING MADE THE APPROACH AND BEING WITHIN, YOU
17 KNOW, 20 OR 30 FEET OF THE POST.

18 AND THIS IS THE -- THIS IS THE GUARD POST; THIS
19 STOP SIGN IS RIGHT HERE, THIS IS THE STOP SIGN INDICATED ON
20 THIS, AND THE STREET THAT GOES TO THE RIGHT THERE IS THIS
21 AREA HERE. THESE CARS ARE PARKED IN THIS AREA RIGHT ALONG
22 HERE (POINTING).

23 Q IS THAT A FAIR AND ACCURATE REPRESENTATION OF
24 THE SCENE OF THE GUARD POST FROM THAT ANGLE?

25 A YES, IT IS.

26 Q NOW, THE ONE ON TOP, WHICH IS EXHIBIT 90 FOR
27 IDENTIFICATION, WHAT DOES THAT DEPICT?

28 A OKAY. THIS IS A VIEW OF THE GUARD POST FROM

1 THE OPPOSITE DIRECTION. THIS IS LOOKING AT IT COMING FROM
2 THIS DIRECTION, COMING FROM THE MAIN CAMPUS, AND IT -- THIS
3 CURB THAT YOU SEE RIGHT HERE BEHIND THE STOP SIGN IS THIS
4 CURB RIGHT HERE. AND THERE IS THE BACK OF THE STOP SIGN
5 THAT YOU SEE THE FRONT OF RIGHT HERE AT THIS POINT RIGHT
6 HERE (POINTING).

7 Q AND DOES THAT PICTURE, WHAT IS MARKED NUMBER 90
8 FOR IDENTIFICATION WHICH YOU JUST TALKED ABOUT, DOES THAT
9 FAIRLY AND ACCURATELY DEPICT WHAT YOU WOULD SEE FROM INSIDE
10 OF CAMELOT LOOKING DOWN THAT STREET?

11 A YES, IT DOES.

12 MR. KLEIN: YOUR HONOR, AT THIS POINT I WOULD ASK
13 THAT NUMBERS 87, 88, AND 90 AND 111 FOR IDENTIFICATION BE
14 RECEIVED IN EVIDENCE.

15 MR. LEVY: YOUR HONOR, I AM GOING TO OBJECT UNTIL WE
16 HAVE EITHER VOIR DIRE ON THIS SUBJECT OR SOME FURTHER
17 CLARIFICATION ON CROSS.

18 THE COURT: WHY DON'T WE DEFER THIS FOR THE TIME
19 BEING.

20 MR. KLEIN: OKAY.

21 THE COURT: YOU CAN BRING IT UP AT A LATER TIME.

22 MR. KLEIN: OKAY.

23 Q MR. KENYON, NOW DURING THE COURSE OF THE
24 DISCUSSION BETWEEN MR. FRANCIS AND MR. MULL --

25 A UH-HUH.

26 Q -- DID ANY ADDITIONAL PEOPLE FROM THE CHURCH
27 JOIN IN THE -- COME WITHIN THE VICINITY OF THAT GUARDHOUSE?

28 A NONE THAT I RECALL.

1 Q AND WITH RESPECT TO THE PEOPLE WHO WERE ALREADY
2 THERE WHO YOU'VE MENTIONED, FIRST LET'S TALK ABOUT THE
3 CHURCH PEOPLE, DID THEY CHANGE THEIR POSITIONS DURING THE
4 COURSE OF THE TIME THAT MR. FRANCIS WAS TALKING TO MR. MULL?

5 A WELL, THEY MAY HAVE -- ONLY IN A GENERAL SENSE
6 THAT PEOPLE WERE PROBABLY MOVING ABOUT. NO ONE IS IN A
7 STATIC POSITION, BUT THEN AGAIN THERE WAS NOTHING OF A --
8 NOTHING IN PARTICULAR THAT I RECALL.

9 Q NOW, WAS THERE EVER AN OCCASION WHEN ALL OF THE
10 CHURCH PEOPLE LINED UP IN A LINE ACROSS THAT ROAD?

11 A NEVER.

12 Q WAS THERE EVER AN OCCASION DURING THIS ENTIRE
13 INCIDENT, CONFRONTATION, WHEN 12 JUDO EXPERTS OR PEOPLE
14 KNOWLEDGEABLE IN JUDO CAME DOWN AND TOOK PART IN THIS
15 INCIDENT?

16 A IF THEY DID, THEY ESCAPED MY NOTICE.

17 Q I TAKE IT THAT WHEN YOU SAY THEY ESCAPED YOUR
18 NOTICE, WAS THAT TONGUE IN CHEEK?

19 A YES, IT WAS.

20 Q COULD ANY OTHER GROUP OF PEOPLE HAVE COME AND
21 TAKEN PART IN THIS INCIDENT AND YOU NOT SEEN IT?

22 A NO, NOT -- IT'S POSSIBLE THAT ONE OR TWO PEOPLE
23 MIGHT HAVE BEEN PRESENT WITHOUT MY REMEMBERING THEM, BUT NO
24 MORE. AND I DON'T THINK THERE WERE ANY. BUT CERTAINLY NO
25 LARGE GROUP.

26 Q AND REGARDLESS OF ONE OR TWO -- IF ONE OR TWO
27 MORE PEOPLE CAME DOWN AND BECAME INVOLVED, ARE YOU CERTAIN
28 AS TO THE FACT THAT THERE WAS NEVER A LINE-UP ACROSS THE

1 ROAD?

2 A OH, ABSOLUTELY. ABSOLUTELY.

3 Q ARE YOU -- DO YOU KNOW JUDO?

4 A NO.

5 Q I THINK YOU CAN SIT DOWN NOW.

6 A OH.

7 Q DURING THE COURSE OF THAT INCIDENT, DID THERE
8 COME A TIME WHEN TOM MILLER ARRIVED?

9 A YES. I AM NOT CERTAIN WHEN, BUT I KNOW HE WAS
10 THERE THROUGH A GOOD PORTION OF THE EVENT. BUT I CAN'T
11 REMEMBER WHEN HE ARRIVED.

12 Q WAS MONROE SHEARER EVER THERE?

13 A NOT TO MY RECOLLECTION.

14 Q DURING THE TIME THAT MR. MULL WAS THERE, DID
15 ANYONE EVER PHYSICALLY TOUCH HIM?

16 A NO.

17 Q DID ANYONE EVER MAKE ANY THREATS TOWARD HIM?

18 A NO.

19 Q HOW FAR WOULD YOU ESTIMATE THAT MR. FRANCIS WAS
20 FROM MR. MULL DURING THE COURSE OF THIS CONFRONTATION?

21 A FEW FEET. FOUR, FIVE FEET AT THE CLOSEST.

22 Q WERE THERE TIMES WHEN EITHER MR. FRANCIS OR MR.
23 MULL MOVED EITHER FURTHER OR BACK OR LEFT OR RIGHT? DID
24 THAT HAPPEN DURING THE COURSE OF THIS?

25 A IT'S POSSIBLE THAT THERE WAS SOME MOVEMENT AWAY
26 FROM THE IMMEDIATE VICINITY OF THE GUARD POST BECAUSE THERE
27 WAS A -- THERE IS A CONCERN ABOUT TRAFFIC. I DON'T HAVE --
28 I AM SURE THAT WE WOULD HAVE, YOU KNOW, THINGS PROBABLY

1 WOULD HAVE SHIFTED OVER TO ONE SIDE A LITTLE BIT, BUT I
2 DON'T REMEMBER EXACTLY HOW THAT WOULD HAVE WORKED OUT.

3 Q DURING THE TIME THAT THIS CONFRONTATION WAS
4 OCCURRING, WERE CARS DRIVING UP AND DOWN THAT ROAD?

5 A YES. YEAH.

6 Q PEOPLE COMING TO SEE THE SQUARE DANCE?

7 A YEAH.

8 Q HOW LONG, AS BEST YOU CAN RECOLLECT, DID MR.
9 MULL AND MR. FRANCIS SPEND TALKING TO EACH OTHER?

10 A IT IS HARD TO SAY. IT COULD HAVE BEEN AS MUCH
11 AS 15 TO 20 MINUTES. THAT WOULD BE -- THAT WOULD BE MY
12 GUESS AND IT IS JUST A GUESS.

13 Q DURING THE TIME THAT YOU WERE THERE, AND YOU
14 WERE THERE FOR THE ENTIRE CONFRONTATION?

15 A RIGHT.

16 Q DID ANYTHING, AS FAR AS YOU COULD SEE, EVER
17 PREVENT MR. MULL FROM JUST TURNING AROUND AND LEAVING
18 WHENEVER HE WANTED?

19 A NO.

20 Q DID YOU EVER SEE ANY PEOPLE FROM THE CHURCH
21 SIDE RAISING THEIR ARMS OR DOING ANYTHING WITH THEIR ARMS
22 DURING THE COURSE OF THIS CONFRONTATION?

23 A NO.

24 Q HOW LONG HAVE YOU BEEN AFFILIATED WITH CHURCH
25 UNIVERSAL AND TRIUMPHANT?

26 A I ORIGINALLY BECAME INTERESTED IN THEM IN 1975
27 AND I WENT ON STAFF IN FALL OF '76.

28 Q HOW LONG DID YOU REMAIN ON STAFF?

1 A ABOUT -- ABOUT EIGHT YEARS, SEVEN OR EIGHT
2 YEARS. TILL '83, IN THE FALL OF '83 I BELIEVE IT WAS.

3 Q AND IN THE FALL OF '83, YOU LEFT THE CHURCH
4 STAFF?

5 A THAT'S RIGHT. AS FAR AS THE FULL-TIME STAFF IS
6 CONCERNED, THAT'S RIGHT.

7 Q YOU REMAINED A CHURCH MEMBER?

8 A THAT'S RIGHT.

9 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. COUNSEL
10 IS LEADING HIS OWN WITNESS.

11 THE COURT: SUSTAINED.

12 Q BY MR. KLEIN: DID YOU REMAIN A CHURCH MEMBER
13 AFTER YOU LEFT THE STAFF?

14 A YES, I DID.

15 Q WHY DID YOU LEAVE THE STAFF?

16 A WELL, I HAD SOME PROJECTS THAT I WAS ANXIOUS TO
17 PURSUE, AND THAT I HAD BROUGHT THOSE PROJECTS UP A NUMBER OF
18 TIMES OVER A PERIOD OF TIME, AND I HAD -- WITH MOTHER AND
19 WITH THE IDEA THAT I FELT I COULD REALLY ACCOMPLISH
20 SOMETHING IN THESE AREAS. AND BASICALLY WE AGREED AFTER A
21 WHILE THAT IT WOULD BE APPROPRIATE FOR ME TO DO SO.

22 Q DID ANYONE EVER TRY TO DO OR SAY ANYTHING TO
23 YOU TO PREVENT YOU FROM LEAVING THE CHURCH STAFF?

24 A NEVER.

25 Q ONCE YOU LEFT THE CHURCH STAFF, DID ANYONE IN
26 ANY WAY HARASS, INTIMIDATE OR THREATEN YOU?

27 A NO.

28 Q DURING THE TIME YOU HAVE BEEN ASSOCIATED WITH

1 THE CHURCH, HAVE YOU EVER HEARD OF ANY PERSON WHO LEFT THE
2 STAFF BEING HARASSED OR INTIMIDATED OR THREATENED BY
3 ANYBODY?

4 A I WAS NEVER AWARE OF ANY SUCH THING, NO.

5 Q HAVE YOU EVER HEARD OF ANY CHURCH OFFICIAL OR
6 ELIZABETH CLARE PROPHET EVER TELLING ANY CHURCH MEMBERS TO
7 HARASS OR THREATEN OR INTIMIDATE EX-STAFF MEMBERS?

8 A NO. I HEARD SUCH REPORTS COMING BACK IN FROM
9 PEOPLE WHO WERE OBVIOUSLY DISGRUNTLED. OUTSIDE OF THAT, NO.

10 Q WHAT IS THE ROLE OF ELIZABETH CLARE PROPHET IN
11 CHURCH UNIVERSAL AND TRIUMPHANT?

12 A SHE IS A LEADER IN MANY RESPECTS. AND
13 CERTAINLY THE FIGURE THAT WE ALL HAVE THE GREATEST REVERENCE
14 AND RESPECT FOR, AND WHO WE SEE AS A, YOU KNOW, IN THE
15 OFFICE OF, YOU KNOW, OF LEADER OF THE CHURCH AND
16 REPRESENTATIVE OF THE — THE REPRESENTATIVE OF GOD AS BEST
17 WE ARE ABLE TO UNDERSTAND THAT SORT OF THING.

18 Q IS IT EVER TAUGHT THAT SHE IS PERFECT AND NEVER
19 MAKES MISTAKES?

20 A NEVER.

21 Q MAYBE I SHOULD MAKE THAT CLEAR. NEVER MAKES
22 MISTAKES OR NEVER TAUGHT?

23 A IT IS NEVER TAUGHT THAT SHE IS IN ANY HUMANLY
24 WAY PERFECT.

25 Q DID YOU LIVE IN CAMELOT FROM 1979 TO 1980?

26 A YES, I DID.

27 Q WHAT EFFECT, IF ANY, DID LIVING AT CAMELOT HAVE
28 ON YOUR LIFE?

1 A OH, VERY POSITIVE. I HAD CERTAINLY -- I WAS
2 ABOUT 30 WHEN I ORIGINALLY GOT -- BECAME ACTIVE IN THE
3 CHURCH IN A STAFF WAY, AND I OF COURSE HAD TRAVELED AROUND
4 QUITE A BIT AND I HAD SOME VERY STRONG OPINIONS ABOUT WHAT I
5 WAS LOOKING FOR. AND I FOUND IT AT CAMELOT AND THE
6 TEACHINGS OF THE ASCENDED MASTERS AS WE WERE TAUGHT THEM.

7 Q HOW WOULD YOU DESCRIBE LIFE AT CAMELOT?

8 A WELL, IT WAS VERY INTENSE, IT WAS VERY JOYOUS,
9 AND IT WAS -- THERE WAS A GREAT DEAL OF ENERGY. IT SEEMED
10 TO ALMOST CRACKLE A LOT OF THE TIMES BECAUSE PEOPLE WERE
11 VERY -- IN A STATE OF KIND OF, YOU MIGHT SAY, PERPETUAL
12 EXCITEMENT ABOUT WHATEVER -- WHATEVER THEY WERE DOING AND
13 WHATEVER WE WERE TRYING TO ACCOMPLISH.

14 Q DO YOU DECREE?

15 A YES, I DO.

16 Q WHAT DOES DECREERING MEAN TO YOU?

17 A IT IS PRAYER. PRAYER IS A WORD THAT HAS A LOT
18 OF DIFFERENT MEANINGS AND I --

19 MR. LEVY: EXCUSE ME, SIR. I THINK YOU HAVE ANSWERED
20 THE QUESTION.

21 I AM GOING TO OBJECT THAT ANY STATEMENT OTHER
22 THAN HIS INITIAL STATEMENT BE STRICKEN AS NONRESPONSIVE,
23 SELF-SERVING AND -- I WILL STOP THERE.

24 THE COURT: THE LAST ANSWER OF THE WITNESS IS
25 STRICKEN. THE JURY IS DIRECTED TO DISREGARD IT.

26 MR. KLEIN: YOUR HONOR, HAVE YOU STRICKEN THE WHOLE
27 ANSWER?

28 THE COURT: WHY DON'T YOU START OVER. ASK THE

1 QUESTION, AND MR. KENYON WILL ANSWER THE QUESTION AND WE CAN
2 PROCEED.

3 Q BY MR. KLEIN: WHAT DOES DECREERING MEAN TO YOU?

4 A PRAYER.

5 Q AND WHAT EFFECT DOES DECREERING HAVE ON YOU?

6 A IT AIDS IN MY ALERTNESS, IN MY ABILITY TO BE --
7 MY CONCENTRATION, MY ABILITY TO HANDLE VARIOUS STRESSES THAT
8 I MIGHT BE SUBJECT TO FOR ONE REASON OR ANOTHER AND
9 BASICALLY IS POSITIVE IN EVERY RESPECT. I MIGHT ADD THAT IT
10 HAS FOR ME MUCH THE SAME EFFECT AS RUNNING. I AM -- I RUN
11 REGULARLY AND IT HAS A SIMILAR AFFECT ON ME.

12 Q WHAT -- HAS THERE EVER BEEN ANY TEACHINGS FROM
13 THE TIME YOU HAVE BEEN ASSOCIATED WITH THE CHURCH THAT YOU
14 SHOULD FEAR NONCHURCH MEMBERS?

15 A NO, NEVER.

16 Q EVER BEEN ANY TEACHINGS YOU SHOULDN'T
17 COMMUNICATE WITH NONCHURCH MEMBERS?

18 A NO. THERE ARE CERTAINLY, YOU KNOW, TEACHINGS
19 THAT ARE BETTER UNDERSTOOD BY PEOPLE WHO HAVE HAD SOME
20 INTRODUCTION TO THE TEACHINGS AND I PERSONALLY WOULD
21 CONSIDER, YOU KNOW, MY RESPONSIBILITY IN TRYING TO
22 COMMUNICATE ANY ASPECTS OF THE TEACHINGS TO MAKE SURE THAT
23 PEOPLE UNDERSTOOD THE PREMISES THAT THINGS WERE BASED ON.

24 Q I AM NOT SO MUCH TALKING ABOUT TELLING
25 NONMEMBERS ABOUT THE TEACHINGS AS MUCH AS JUST COMMUNICATING
26 WITH NONMEMBERS AT ALL. ARE THERE ANY RESTRICTIONS ABOUT
27 THAT?

28 A THERE CERTAINLY WEREN'T FOR ME AND I AM NOT

1 AWARE THAT THERE WERE FOR ANYONE.

2 Q DO YOU AND HAVE YOU -- LET ME WITHDRAW THAT.

3 DURING THE TIME THAT YOU WERE A STAFF MEMBER AT
4 CHURCH UNIVERSAL AND TRIUMPHANT, DID YOU MAINTAIN CONTACTS
5 WITH YOUR FAMILY AND FRIENDS?

6 A YES, I DID.

7 Q WHAT KIND OF CONTACTS DID YOU HAVE WITH THEM?

8 A REGULAR CORRESPONDENCE, FREQUENT TELEPHONE
9 CALLS, I SAW THEM A FEW TIMES. IF I MIGHT ADD, I WAS --
10 BEFORE I EVER BECAME ACTIVE IN THE CHURCH, I HAD LONG SINCE
11 CEASED TO MAINTAIN THE KIND OF CONTACTS THAT, YOU KNOW, WERE
12 ASSOCIATED WITH MY CHILDHOOD ANYWAY. I WAS CERTAINLY -- HAD
13 GOTTEN AWAY FROM HOME AND HAD CUT THE CORD.

14 Q AT THE TIME -- WERE THE CONTACTS YOU HAD WITH
15 THE FAMILY ANY DIFFERENT ONCE YOU JOINED THE CHURCH FROM
16 WHAT THEY HAD BEEN DURING THE YEAR OR TWO BEFORE YOU HAD
17 JOINED?

18 A NO, THEY REALLY WEREN'T.

19 Q WHILE YOU WERE AT CAMELOT, YOU HAD ACCESS TO A
20 PHONE IF YOU WANTED TO CALL FAMILY AND FRIENDS?

21 A ABSOLUTELY.

22 Q DURING THE YEARS THAT YOU'VE BEEN ASSOCIATED
23 WITH CHURCH UNIVERSAL AND TRIUMPHANT, HAVE YOU BEEN TREATED
24 FAIRLY?

25 A YES.

26 MR. KLEIN: THANK YOU.

27 I HAVE NO FURTHER QUESTIONS.

28 MR. LEVY: THANK YOU, YOUR HONOR.

CROSS-EXAMINATION +

1
2 BY MR. LEVY:

3 Q MR. KENYON, YOU TOLD US YOU DO SOME RUNNING?

4 A THAT'S RIGHT.

5 Q HOW MUCH DO YOU RUN EVERY DAY?

6 A OH, TWO AND A HALF, THREE MILES.

7 Q WHAT IS THE LONGEST DISTANCE YOU'VE EVER RUN?

8 A ABOUT FIVE MILES.

9 Q GET TIRED AT THE END OF FIVE MILES?

10 A YEAH.

11 Q YOU TOLD US DECREEEING MAKES YOU FEEL JUST LIKE
12 YOU FEEL WHEN YOU ARE RUNNING. ARE YOU SAYING THAT YOU GET
13 TIRED AFTER DECREEEING LIKE YOU GOT TIRED AFTER RUNNING?

14 A NO. I AM SAYING THAT IT HAS THE EFFECT OF
15 MAKING ME FEEL EXHILARATED AND BASICALLY LIKE THAT, YOU
16 KNOW, I HAVE CLEARED AWAY A LOT OF THE DEBRIS THAT WE HAVE
17 TO CONTEND WITH ON A REGULAR BASIS. I DON'T THINK MY
18 EXPERIENCE IS UNIQUE IN THAT REGARD AS FAR AS RUNNING IS
19 CONCERNED.

20 Q HOW LONG IS THE LONGEST TIME YOU'VE EVER
21 DECREED AT ONE TIME?

22 A AT ONE TIME?

23 Q YES.

24 A I HAVE CERTAINLY DONE IT FOR A FEW HOURS AT A
25 TIME OCCASIONALLY.

26 Q FEW BEING ABOUT THREE?

27 A YEAH. THAT IS PROBABLY ABOUT -- AT THE MOMENT,
28 THAT IS THE LONGEST I CAN RECALL. IT IS POSSIBLE THERE

1 MIGHT HAVE BEEN A LONGER TIME AT SOME TIME.

2 Q LIKE SAY ON A SUNDAY MORNING SERVICE WHEN YOU
3 ARE WAITING FOR ELIZABETH TO SHOW UP, AS A STAFF MEMBER,
4 ABOUT WHAT TIME WOULD YOU GET THERE?

5 A USUALLY --

6 MR. KLEIN: I AM GOING TO OBJECT. THAT IS A COMPOUND
7 QUESTION, YOUR HONOR.

8 THE COURT: PLEASE REPHRASE IT.

9 Q BY MR. LEVY: DID YOU EVER ATTEND SUNDAY
10 MORNING SERVICES AT THE CHURCH?

11 A YES, I DID.

12 Q AS A STAFF MEMBER, DID YOU PRECEDE THE ENTRANCE
13 OF ELIZABETH CLARE PROPHET?

14 A OH, FREQUENTLY.

15 Q WHAT TIME WOULD BE THE GENERAL TIME FOR ARRIVAL
16 OF STAFF?

17 A IT WOULD VARY. I USUALLY MYSELF ARRIVED AROUND
18 TEN O'CLOCK.

19 Q WHEN YOU ARRIVED, WERE THERE OTHER STAFF
20 MEMBERS THERE THAT HAD PRECEDED YOUR ARRIVAL?

21 A YES.

22 Q WHAT IS THE LONGEST TIME YOU EVER HAD TO WAIT
23 BEFORE MISS PROPHET SHOWED UP?

24 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCY,
25 YOUR HONOR.

26 THE COURT: OVERRULED.

27 YOU CAN ANSWER.

28 THE WITNESS: WELL, THERE WERE -- THERE HAVE BEEN

1 PERIODS WHERE THERE WERE FOUR OR FIVE HOURS.

2 Q BY MR. LEVY: WHAT DID YOU DO FOR THE FOUR OR
3 FIVE HOURS?

4 A I MYSELF? I WOULD TAKE FREQUENT BREAKS MYSELF.
5 BUT DECREES WERE CARRIED ON AND AT A CONTINUOUS TIME, BUT NO
6 ONE PERSON USUALLY DECREED FOR THAT ENTIRE TIME FOR
7 THEMSELVES IF THAT IS WHAT YOU ARE DRIVING AT.

8 Q NOW IN THE COURSE OF TIME WHEN YOU SPENT UP TO
9 THREE HOURS IN DECREERING, WERE YOU VERBALIZING YOUR DECREE
10 ALOUD?

11 A MOST OF THE TIME, YEAH.

12 Q THAT MAKE YOU FEEL LIKE WHEN YOU WERE RUNNING,
13 USING UP THAT ENERGY TO VERBALIZE THE DECREES?

14 A ABSOLUTELY. IT WAS VERY POSITIVE. MADE ME
15 FEEL GREAT.

16 Q DID YOU EVER DECREE FOR THAT PERIOD OF TIME
17 DOING RAPID-FIRE DECREES? THAT IS DESCRIPTIVE, NOT NAME OF
18 THE DECREE.

19 A I THINK I CAN SAFELY SAY SO, YEAH. I DON'T
20 HAVE ANY TROUBLE WITH THAT.

21 Q FOR SOMETIMES THREE HOURS YOU WERE GOING
22 RAPIDLY WITH THE DECREE MATERIAL?

23 A I PERSONALLY WOULD NEVER DECREE THAT LONG AT A
24 STRETCH. I WOULD ALWAYS TAKE A BREAK IF NEED BE AFTER SOME
25 POINT.

26 Q NOW, SINCE IT MADE YOU HYPERAWARE AND EXTRA
27 ALERT AND CHARGED UP, DID YOU EVER HAVE AN OPPORTUNITY TO
28 LOOK AROUND AT SOME OF THE OTHER PEOPLE WHO WERE DECREERING

1 ALONGSIDE YOU?

2 A SURE.

3 Q DID YOU EVER IN ALL THE TIME YOU WERE
4 ASSOCIATED WITH THE CHURCH SEE IT AFFECT ANYONE OTHER THAN
5 IT HAD AFFECTED YOU?

6 A I DON'T THINK I WAS IN A POSITION TO JUDGE THE
7 EFFECT THAT IT WAS HAVING ON OTHER PEOPLE. IN GENERAL I
8 WOULD SAY THAT THEY WERE HAVING THE SAME EXPERIENCE THAT I
9 WAS HAVING, YEAH.

10 Q DID YOU EVER SEE ANYBODY CLOSE THEIR EYES OR
11 NOD THEIR HEAD OR --

12 A SURE.

13 Q WERE YOU CLOSING YOUR EYES OR NODDING YOUR
14 HEAD?

15 A SOMETIMES.

16 Q YOU TOLD US THAT THERE WERE REPORTS ABOUT
17 OBVIOUSLY DISGRUNTLED PEOPLE.

18 A UH-HUH.

19 Q WHO DID YOU GET THE REPORTS FROM?

20 A SOMETIMES WE GOT IT FROM THE NEWSPAPERS. MOST
21 OFTEN THAT WAS THE SOURCE OF IT.

22 Q HAVE THERE BEEN IN THE PERIOD OF TIME YOU HAVE
23 BEEN ASSOCIATED WITH THE CHURCH A NUMBER OF OBVIOUSLY
24 DISGRUNTLED PEOPLE?

25 A I WOULD SAY THE NUMBER IS QUITE SMALL, BUT
26 THERE HAVE BEEN A FEW THAT -- WHO ARE MEMORABLE BY VIRTUE OF
27 THEIR -- THE AMOUNT OF ATTENTION THEY MANAGE TO DRAW TO
28 THEIR SITUATION.

1 Q WHEN YOU SAY, "QUITE SMALL," I DON'T WANT TO DO
2 BIGGER THAN A BREAD BOX. DO YOU HAVE AN IDEA AS TO THE
3 NUMBER OF THIS QUITE SMALL GROUP?

4 A OVER TEN YEARS, ABOUT HALF A DOZEN.

5 Q NO MORE THAN HALF A DOZEN?

6 A I AM NOT SAYING THERE COULDN'T POSSIBLY HAVE
7 BEEN MORE THAN. THERE ARE ABOUT HALF A DOZEN THAT COME TO
8 MIND.

9 Q DO YOU KNOW WHAT THE CLOCK OF BETRAYAL IS?

10 A IT IS A TERM THAT HAS AN ASTROLOGICAL
11 SIGNIFICANCE, AND IT REFERS TO INDIVIDUALS WHO HAVE ON A
12 CERTAIN LEVEL IDENTIFY WITH FORCES THAT ARE HOSTILE TO THE
13 CHURCH AND LARGELY THEY WOULD BE HOSTILE.

14 Q WHEN THIS IS USED WITHIN THE CHURCH PROCEDURES,
15 ARE THOSE PEOPLE WHO ARE HOSTILE TO THE CHURCH NAMED?

16 A YEAH, SOMETIMES. YEAH. BUT IT IS NOT A MATTER
17 OF NAMING THEM AS THE OBJECT OF WHATEVER AS TO NAMING
18 WHATEVER MIGHT BE WORKING THROUGH THAT INDIVIDUAL. THERE IS
19 A CLEAR DISTINCTION MADE BETWEEN ANY INDIVIDUAL AND THE
20 FORCES THAT HE MIGHT BE COOPERATING WITH.

21 Q WAS THERE MORE THAN SIX NAMES READ OFF TO YOU
22 WITH REGARD TO THE CLOCK OF BETRAYAL?

23 A THERE WERE, BUT A LOT OF THEM WERE LEFT OVER
24 FROM EARLIER PERIODS BEFORE MY INVOLVEMENT WITH THE STAFF.

25 Q WOULD IT BE FAIR TO SAY THEN THAT BEFORE YOUR
26 AFFILIATION WITH THE STAFF HAS JUST BEEN AN ONGOING NUMBER
27 OF PEOPLE WHO WERE DISGRUNTLED?

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

1 THE RELEVANCY AND CITE SECTION 352 OF THE EVIDENCE CODE.

2 THE COURT: HE CAN ANSWER.

3 THE WITNESS: I DON'T CONSIDER IT A LARGE NUMBER
4 BASED UPON MY EXPERIENCE WITH OTHER RELIGIOUS GROUPS. I
5 THINK IT IS A RATHER SMALL NUMBER.

6 Q BY MR. LEVY: WHAT OTHER RELIGIOUS GROUPS HAVE
7 YOU BEEN AFFILIATED WITH THAT HAVE HAD A SIMILAR NUMBER OF
8 PEOPLE WHO WERE DISGRUNTLED?

9 A WELL, FOR ONE, I WAS BROUGHT UP IN A
10 FUNDAMENTALIST PROTESTANT BACKGROUND. MY FATHER WAS PASTOR
11 OF A NUMBER OF CHURCHES AND I HAVE BEEN PARTICIPANT IN THOSE
12 CHURCHES.

13 I ALSO ATTENDED BOB JONES UNIVERSITY IN
14 GREENVILLE, SOUTH CAROLINA, AND I HAVE AMPLE EXPERIENCE IN
15 WHAT HAPPENS WHEN ORGANIZED RELIGION IS IN A POSITION WHERE
16 IT HAS TO DEAL WITH THOSE WHO AT ONE TIME OR ANOTHER DECIDE
17 THEY DON'T LIKE ANYMORE THE ACTIVITIES THAT THEY HAVE BECOME
18 INVOLVED WITH AND THEY CHANGE THEIR MIND FOR ONE REASON OR
19 ANOTHER.

20 Q GOING BACK TO THE GUARD GATE AND THE SQUARE
21 DANCE DAY --

22 A UH-HUH.

23 Q -- DO YOU REMEMBER WHAT TIME OF DAY THAT WAS?

24 A ROUGHLY, LET'S SEE, I THINK THINGS GOT UNDER
25 WAY ABOUT THREE O'CLOCK, AROUND 3:00 P.M.

26 Q NOW, MR. KLEIN HAS CATEGORIZED WHAT OCCURRED
27 BETWEEN MR. MULL AND MR. FRANCIS AS A CONFRONTATION.

28 DO YOU RECALL WHAT TIME THE CONFRONTATION TOOK

1 PLACE?

2 A WELL, WHEN I SAID THREE O'CLOCK, I MEANT
3 ROUGHLY. THAT -- I AM GENERALIZING. I DON'T REMEMBER
4 PRECISELY THE TIME, BUT IT WOULD HAVE BEEN IN THAT VICINITY.
5 WE ARE TALKING I PROBABLY GOT DOWN THERE AROUND, I DON'T
6 KNOW, AROUND 2:30, THREE O'CLOCK AND IT PROBABLY HAPPENED
7 WITHIN A HALF HOUR, 45 MINUTES FROM THE TIME I GOT DOWN
8 THERE.

9 Q WHAT WAS YOUR PURPOSE IN GOING DOWN THERE?

10 A I WAS THERE TO MEET THE PRESS IF THERE WERE ANY
11 PRESS.

12 Q YOU TOLD US THEN WHEN MR. MULL SHOWED UP, HE
13 HAD A MEMBER OF THE PRESS WITH HIM?

14 A THAT'S RIGHT.

15 Q WHAT DID YOU DO WITH REGARD TO THAT MEMBER OF
16 THE PRESS?

17 A WELL, I DIDN'T HAVE AN OPPORTUNITY TO DO
18 ANYTHING BECAUSE EVENTS WERE RUNNING THEIR OWN COURSE SO
19 NATURALLY I WAS IN THE BACKGROUND. MY DUTY WAS TO BE THERE
20 IF NEEDED. AS IT TURNED OUT, I WASN'T NEEDED.

21 Q NOW, YOU -- I WONDER IF YOU WOULD BE KIND
22 ENOUGH TO STEP BACK THERE TO THE BOARD.

23 NOW, I DON'T KNOW WHAT YOUR BACKGROUND IS IN
24 MATHEMATICS, BUT I THINK SOMEWHERE ON THAT SIGN THERE ON
25 THAT CALABASAS PROPERTY IF YOU START AT THE FRONT GATE --
26 WOULD YOU POINT TO THE FRONT GATE?

27 A (POINTING.)

28 Q THEN YOU WILL SEE SOMEWHERE DOWN THERE WHERE

1 THERE IS A LITTLE GUARDHOUSE DRAWN?

2 A UH-HUH.

3 Q AND JUST BELOW THAT, ON THE BOTTOM SIDE OF THE
4 ROAD THERE IS AN AMOUNT OF FOOTAGE.

5 WOULD YOU TELL US WHAT THAT IS?

6 A SEVEN HUNDRED FIVE.

7 Q IS THAT A QUARTER OF A MILE?

8 A IT IS PROBABLY -- IT IS CLOSER -- IT IS BETWEEN
9 AN EIGHTH AND A QUARTER. QUARTER OF A MILE WOULD BE ABOUT
10 1,200 FEET I BELIEVE.

11 Q ABOUT 1,380 FEET?

12 A RIGHT.

13 Q SO IT IS ABOUT 700 FEET DOWN. NOW, BETWEEN THE
14 GATE, THE OUTSIDE GATE AND THE GUARD POST --

15 A UH-HUH.

16 Q -- IF SOMEONE WERE WALKING IN, IS THERE ANY
17 PLACE BETWEEN THE FRONT GATE AND THE GUARD POST THAT THEY
18 WOULD FIND INSTRUCTIONS THAT THEY ARE TO STOP?

19 A NO.

20 Q THERE IS A STOP SIGN ACROSS FROM THE GUARD
21 GATE?

22 A YES. I THOUGHT YOU MEANT BETWEEN --

23 Q MAYBE I DIDN'T MAKE IT CLEAR. SEE WHERE THE
24 STOP SIGN IS?

25 A (PPOINTING.)

26 Q THAT IS ABOUT THE SAME DISTANCE 705 FEET UP THE
27 ROAD; IS THAT RIGHT?

28 A RIGHT.

1 Q NOW BETWEEN THAT AND GOING BACK TOWARD THE
2 GATE, IS THERE ANY PLACE WHERE A TOTAL STRANGER ENTERING
3 THAT PROPERTY WOULD BE DIRECTED TO STOP PRIOR TO STOPPING AT
4 THE STOP SIGN?

5 A NO.

6 Q SO ANYONE COMING INTO THAT PROPERTY WOULD BE A
7 NORMAL THING FOR THEM TO COME RIGHT UP TO THE GUARD GATE?

8 MR. KLEIN: I AM GOING TO OBJECT IT CALLS FOR
9 SPECULATION, YOUR HONOR.

10 THE COURT: OVERRULED.

11 MR. KLEIN: AND IT ALSO CALLS FOR CONCLUSION.

12 THE WITNESS: WOULD YOU REPEAT THE QUESTION. I AM
13 NOT SURE I UNDERSTOOD YOU.

14 MR. LEVY: LET ME TRY AGAIN.

15 THE COURT: THERE IS NOTHING ALONG THAT WAY TO
16 INTERRUPT A PERSON WALKING IN UNTIL THE GUARD GATE; IS THAT
17 A FAIR STATEMENT?

18 THE WITNESS: YES.

19 MR. LEVY: THANK YOU, YOUR HONOR.

20 THE WITNESS: I MIGHT ADD IT IS UNUSUAL FOR SOMEONE
21 TO BE WALKING. ORDINARILY IT IS FOR CARS.

22 Q BY MR. LEVY: IT IS UNUSUAL FOR PEOPLE TO WALK
23 INTO THAT CHURCH?

24 A TO WALK IN THROUGH THE FRONT GATE, YEAH.
25 ORDINARILY THEY DRIVE IN.

26 Q WHAT IF THEY LIKE TO RUN LIKE YOU? COULD THEY
27 JUST JOG RIGHT ON IN?

28 A THEY -- THEY COULD. THEY COULD. THEY WOULD

1 BE -- WHEN THEY ARRIVED AT THIS POINT, THEY WOULD BE ASKED,
2 YOU KNOW, WHAT THEIR BUSINESS WAS.

3 Q AND ON THE DAY THAT MR. MULL CAME IN WITH HIS
4 DAUGHTER AND MR. AND MRS. MALEK AND A COUPLE OF PEOPLE FROM
5 THE PRESS AND THE GENTLEMAN WHO WAS ACCOMPANYING MR. MULL'S
6 DAUGHTER, THERE HAD BEEN NO REASON FOR THEM TO HAVE STOPPED
7 PRIOR TO GETTING TO THE GUARD GATE, WOULD THERE?

8 A THAT'S RIGHT. THAT'S RIGHT.

9 Q NOW, YOU TESTIFIED THAT THE SQUARE DANCE WAS
10 OPEN TO THE PUBLIC?

11 A RIGHT.

12 Q AND YOU ALSO TESTIFIED THAT MR. MULL WAS NOT A
13 MEMBER OF THE CHURCH AT THAT TIME?

14 A THAT'S RIGHT.

15 Q WHERE DID YOU GET YOUR INFORMATION THAT MR.
16 MULL WAS NOT A MEMBER OF THE CHURCH AT THAT TIME?

17 A WELL, IT HAD COME UP. THERE HAD BEEN SEVERAL
18 NEWSPAPER ARTICLES.

19 Q DID YOU GET ANY OF THAT INFORMATION FROM
20 ANYBODY IN AUTHORITY AT THE CHURCH?

21 A IT WAS IN GENERAL KNOWLEDGE. I DON'T REMEMBER
22 ACTUALLY WHERE I ORIGINALLY HEARD IT. IT WAS CERTAINLY
23 GENERAL KNOWLEDGE.

24 Q IN THE COURSE OF YOUR MEMBERSHIP WITH THE
25 CHURCH, HAVE YOU SEEN ANY OTHER CONFRONTATIONS AT THE FRONT
26 GATE?

27 A NO, I HAVE NOT.

28 Q NOW, IT WOULD HAVE BEEN A RARE OR UNUSUAL THING

1 TO HAVE CONFRONTATIONS AT THE FRONT GATE?

2 A ABSOLUTELY.

3 Q THEN I WONDER IF YOU CAN EXPLAIN TO ME WHILE
4 MR. FRANCIS AND MR. MULL WERE HAVING THAT CONFRONTATION AT
5 THE FRONT GATE, YOU TESTIFIED THAT YOU WERE KIND OF WALKING
6 AROUND AND YOU DIDN'T SEE ANY OTHER PEOPLE AROUND, YOU
7 DIDN'T NOTICE ANYONE ELSE.

8 WAS YOUR ATTENTION FOCUSED ON WHAT WAS GOING ON
9 BETWEEN MR. MULL AND MR. FRANCIS?

10 A YES, IT WAS.

11 Q SO IF SOMEBODY HAD COME WALKING UP BEHIND THE
12 GUARD GATE OUT OF THE TREES TOWARD THE GUARD GATE, OR FROM
13 THE PARKING LOT DIRECTLY BEHIND WHERE YOU ARE STANDING OR
14 OUT OF THE TREES ON THE OTHER SIDE, IS THERE A POSSIBILITY
15 THAT WITH YOUR ATTENTION SO FOCUSED ON THAT RARE AND UNUSUAL
16 OCCURRENCE, YOU MIGHT HAVE MISSED THE PRESENCE OF ANYONE
17 ELSE?

18 A IT WASN'T THAT FOCUSED. IT WAS FOCUSED ENOUGH
19 THAT MY ATTENTION WAS ON IT, BUT I WAS CERTAINLY AWARE OF MY
20 SURROUNDINGS.

21 Q HOW WELL DID YOU KNOW GREGORY MULL AT THE TIME
22 OF THAT INCIDENT AT THE GATE?

23 A DIDN'T KNOW HIM WELL AT ALL, BUT I KNEW WHO HE
24 WAS.

25 Q WHEN YOU SAY YOU DIDN'T KNOW HIM WELL AT ALL
26 BUT YOU KNEW WHO HE WAS, WAS THERE ANYTHING THAT OCCURRED
27 WITHIN THE CHURCH THAT DIRECTED YOUR ATTENTION TO WHO HE
28 WAS?

1 A YOU MEAN DURING THE TIME THAT HE WAS ON STAFF?

2 Q DURING ANY TIME.

3 A WE WERE -- HE SERVED AS USHER A FEW TIMES WHEN
4 I DID AND I CERTAINLY SAW HIM AROUND. I WAS AWARE OF WHEN
5 HE HAD BEEN MARRIED AND A NUMBER OF OTHER, YOU KNOW, EVENTS
6 THAT WERE COMMON KNOWLEDGE IN THE COMMUNITY. HE ALSO LIVED
7 IN THE VICINITY OF MY OFFICE IN THE GRAIL.

8 Q WERE YOU EVER PERMANENT STAFF AT THE CHURCH?

9 A YES, I WAS.

10 Q WHEN YOU BECAME PERMANENT STAFF, WERE YOU TOLD
11 WHAT THE TERMS AND CONDITIONS OF YOUR BECOMING PERMANENT
12 STAFF WERE?

13 A YES.

14 Q WOULD YOU TELL US WHAT PERMANENT STAFF
15 GENERALLY SPEAKING DOES WITH REGARD TO THEIR ASSETS?

16 MR. KLEIN: YOUR HONOR, MAY I JUST ASK IF MR. LEVY IS
17 NOT GOING TO HAVE THE WITNESS USE THE CHART, MAYBE HE CAN
18 SIT DOWN AT THIS POINT.

19 Q BY MR. LEVY: WELL, I HAVE NO QUARREL IF YOU'D
20 LIKE TO SIT DOWN, SIR. I AM STANDING HERE AND I JUST GOT
21 USED TO FOLKS STANDING UP.

22 A WELL, IT MEANT A COMMITMENT, BUT IT DIDN'T
23 INVOLVE ANYTHING FORMALLY. IT JUST MEANT IN GENERAL ONE WAS
24 SAYING THAT ONE WAS PLACING ONE'S COMMITMENT TO THE STAFF
25 AND TO THE CHURCH AND, YOU KNOW, AT THE TOP OF ONE'S LIST OF
26 PRIORITIES. AND THAT, YOU KNOW, THAT WAS A SERIOUS
27 COMMITMENT. I TOOK IT VERY SERIOUSLY AND STILL DO.

28 Q NOW, IF YOU ARE, SAY, JUST PROBATIONARY STAFF,

1 YOU DON'T HAVE TO GIVE EVERYTHING THAT YOU HAVE TO THE
2 CHURCH, DO YOU, BECAUSE THAT COMMITMENT IS A LOWER
3 COMMITMENT, RIGHT?

4 MR. KLEIN: OBJECT. COMPOUND QUESTION.

5 THE COURT: OVERRULED.

6 YOU MAY ANSWER.

7 THE WITNESS: PERMANENT STAFF OR NOBODY WAS REQUIRED
8 TO GIVE EVERYTHING THAT THEY HAD TO THE CHURCH.

9 AND AS FAR AS THE DIFFERENCE BETWEEN PERMANENT
10 STAFF AND PROBATIONARY STAFF, IT WAS A SIMILAR COMMITMENT.
11 AND IT WAS JUST BASICALLY TAKING THE -- IT REALLY JUST MEANT
12 TAKING VERY SERIOUSLY WHAT WE WERE DOING AND SAYING, THAT
13 THAT WAS REALLY UPPERMOST IN OUR MINDS, AND WE WERE SERIOUS
14 ABOUT IT AND WE WERE.

15 Q BY MR. LEVY: NOW, ARE YOU TELLING THE COURT
16 THAT THE ONLY DIFFERENCE IS THE DEGREE OF COMMITMENT IN YOUR
17 MIND? THAT IS THE ONLY DIFFERENCE?

18 A ACTUALLY, THE COMMITMENT WAS REALLY THE SAME.
19 IT IS JUST THAT ONE WHO WAS A PROBATIONARY STAFF WAS
20 ULTIMATELY, AS I UNDERSTOOD IT, WAS GIVEN THE STATUS OF
21 PERMANENT STAFF AFTER A CERTAIN PERIOD OF PROBATION.

22 Q NOW ELIZABETH CLARE PROPHET TESTIFIED IN HER
23 DEPOSITION THAT PERMANENT STAFF MEMBERS WERE EXPECTED TO
24 TURN OVER THEIR REAL PROPERTY AND THEIR ASSETS AND TO WORK
25 FULL-TIME FOR THE CHURCH.

26 NOW, IS YOUR TESTIMONY DIFFERENT NOW THAN HERS
27 WAS THEN?

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

1 MISCHARACTERIZES WHAT THE TESTIMONY WAS.

2 THE COURT: OBJECTION IS OVERRULED.

3 THE WITNESS: I NEVER FELT MYSELF THAT I WAS -- THAT
4 THERE WAS ANY OBLIGATION ON MY PART TO -- I ACTUALLY NEVER
5 HAD TO DEAL WITH THE QUESTION BECAUSE THERE WASN'T ANY
6 PARTICULAR PROPERTY THAT I HAD TO DEAL WITH. I NEVER FELT
7 THAT THERE WAS ANYTHING THERE THAT I WOULDN'T BE ABLE TO
8 DEAL WITH ON A PERSONAL BASIS.

9 COULD I COMMENT ON SOMETHING IN REGARD TO THIS
10 SORT OF THING?

11 Q BY MR. LEVY: SURE.

12 A THERE WERE A NUMBER OF, YOU MIGHT SAY, IDEAS OR
13 TEACHINGS THAT WOULD HAVE BEEN ISSUED AT PARTICULAR TIMES.
14 NONE OF WHICH I EVER VIEWED AT ANY TIME AS BEING SOMETHING
15 THAT I COULD NOT PERSONALLY TAKE EXCEPTION TO IF I FELT SO
16 LED TO DO SO.

17 AND AS A MATTER OF FACT, I ALWAYS UNDERSTOOD
18 THAT AS BEING MY DUTY NOT ONLY, SAY, SOMETHING THAT I COULD
19 DO, BUT SOMETHING THAT I SHOULD DO, THAT I SHOULD EVALUATE
20 PERSONALLY ANY ACTION THAT I TOOK. AND THAT WAS NO
21 EXCEPTION.

22 Q NOW, BACK TO MY QUESTION. IS IT CUSTOMARY IN
23 THE CHURCH IF SOMEBODY BECAME PERMANENT STAFF, TO DIVEST
24 THEMSELVES OF THEIR REAL PROPERTY AND ASSETS AND TO WORK
25 FULL-TIME OF THE CHURCH?

26 A I AM NOT AWARE OF ANYONE GOING THROUGH ANY
27 FORMAL DIVESTITURE. NO, I AM NOT.

28 Q LET'S SAY IT WAS AN INFORMAL DIVESTITURE.

1 A I AM CERTAIN THAT PEOPLE WHO MADE THE
2 COMMITMENT, THAT THEIR FULL -- EVERYTHING THEY COULD
3 CONTRIBUTE TO THE CHURCH, THEY WOULD.

4 Q ARE THERE DIFFERENT SET OF STANDARDS WHEN YOU
5 LIVE IN CAMELOT THAN WHEN YOU ARE JUST, SAY, A COMMUNITY
6 MEMBER LIVING OFF OF CAMELOT?

7 MR. KLEIN: I AM GOING TO OBJECT.

8 THE WITNESS: YES.

9 MR. KLEIN: VAGUE AND AMBIGUOUS AS TO WHAT STANDARDS
10 HE IS REFERRING TO, YOUR HONOR.

11 THE COURT: YOU MIGHT REPHRASE IT.

12 Q BY MR. LEVY: DO YOU UNDERSTAND MY QUESTION?

13 A WELL, ONLY IN GENERAL.

14 Q THEN LET ME ASK IT SPECIFICALLY. IF YOU ARE
15 PERMANENT STAFF AND YOU LIVE AT CAMELOT, ARE THE RULES WITH
16 REGARD TO, LET'S SAY, MARRIAGE DIFFERENT THAN THEY ARE FOR
17 SOMEONE WHO JUST MAILES IN A MAIL ORDER BLANK TO RECEIVE THE
18 PEARL?

19 A WELL, I THINK THAT IS PROBABLY SO.

20 Q DID YOU EVER LIVE ON CAMELOT AS PERMANENT
21 STAFF?

22 A YES, I DID.

23 Q WERE THERE RULES AT THAT TIME ABOUT GETTING
24 PERMISSION FROM THE CHURCH PRIOR TO MARRIAGE?

25 A IT WAS DEFINITELY TAKEN AS ONE'S RESPONSIBILITY
26 THAT IN THE MATTER OF MARRIAGE, ONE SHOULD -- ONE SHOULD
27 MAKE SURE THAT THE CHURCH WAS, YOU KNOW, THAT IT WAS
28 APPROVED, THAT IT WAS BLESSED. I THINK THE REAL OBJECTIVE

1 WAS TO GET THE BLESSING OF MOTHER AND THE CHURCH. CERTAINLY
2 PEOPLE TOOK EXCEPTION TO IT ON MANY OCCASIONS.

3 Q WOULD IT BE A FAIR STATEMENT THAT THERE WAS A
4 LOT OF DIFFERENT STANDARDS FOR PERMANENT STAFF THAN IT WAS
5 FOR COMMUNITY MEMBERS WITH REGARD TO WHAT PEOPLE COULD AND
6 COULD NOT DO?

7 A THERE WAS A HIGHER STANDARD, THERE WAS A
8 GREATER DISCIPLINE, YES.

9 Q WHERE DID YOU LIVE WHEN YOU RESIDED AT CAMELOT?

10 A I LIVED MORE THAN ONE PLACE. BUT FOR A WHILE I
11 LIVED IN THE DORMITORY AT -- IN THE DIVINESHIP AND I STAYED
12 AT MY OFFICE FOR A WHILE.

13 Q AND WHERE WAS YOUR OFFICE?

14 A IN THE CHAPEL OF THE HOLY GRAIL.

15 Q SO FAR WE HAVE HEARD AN AWFUL LOT ABOUT BEDS
16 AND MATTRESSES AND STUFF. WHILE YOU WERE ON PERMANENT
17 STAFF, WAS SOME OF THE BEDDING OR A GOOD PART OF IT ROLL-UP
18 FOAM PADDING?

19 A MANY PEOPLE USED THE FOAM PADS. IT WAS
20 USUALLY -- IT DEPENDED ON THE INDIVIDUAL THOUGH. SOME
21 PEOPLE -- DEPENDED ACTUALLY HOW MUCH AN INDIVIDUAL -- HOW
22 MUCH COMFORT AN INDIVIDUAL WANTED. SOME WANTED A GREAT DEAL
23 AND SOME WANTED LESS.

24 Q WOULD IT BE A FAIR STATEMENT TO SAY THAT FOR A
25 LARGE PART OF THE TIME WHEN YOU WERE LIVING AT CAMELOT AND
26 PART OF PERMANENT STAFF, THERE WERE QUITE A FEW PEOPLE WHO
27 WERE LIVING ON INCH OR INCH AND A HALF THICK FOAM PADS RIGHT
28 ON THE CONCRETE FLOOR?

1 A SOME DID, I AM SURE.

2 Q NOW, BACK TO THE SQUARE DANCE ONCE AGAIN. YOU
3 SAY WHEN MR. MULL SHOWED UP, I BELIEVE YOU TESTIFIED THAT HE
4 TOLD EDWARD THAT HE WANTED -- HE CAME TO DANCE?

5 A UH-HUH.

6 Q IF I AM CORRECT, YOU TOLD US THAT HIS ATTITUDE
7 WAS NOT HOSTILE --

8 A NO.

9 Q -- WHEN HE ARRIVED?

10 A IT SEEMED TO BE RATHER IN -- MY IMPRESSION WAS
11 THAT HE WAS MAKING A RATHER HYPOCRITICAL SORT OF REMARK AND
12 I THINK THAT IS GENERALLY THE WAY IT WAS SEEN. AND HE
13 DIDN'T SEEM TO BE SINCERE.

14 Q DO I APPEAR TO BE SINCERE TO YOU RIGHT NOW?

15 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCE
16 OF THAT, YOUR HONOR.

17 THE COURT: SUSTAINED.

18 Q BY MR. LEVY: HOW DO YOU TELL WHETHER MR. MULL,
19 AS HE IS SITTING HERE, IS SINCERE OR NOT?

20 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCE,
21 "AS HE IS SITTING HERE."

22 THE COURT: OVERRULED.

23 THE WITNESS: WELL, ANY EVALUATION THAT I MIGHT MAKE
24 OVER ONE PERSON'S SINCERITY WOULD LARGELY DEPEND UPON MY
25 EXPERIENCE WITH THAT INDIVIDUAL OVER A PERIOD OF TIME.

26 Q BY MR. LEVY: YOU HAVE ALREADY TOLD US THAT YOU
27 DIDN'T KNOW HIM TOO WELL?

28 A THAT'S RIGHT. I MAY HAVE BEEN WRONG, BUT THAT

1 WAS MY IMPRESSION FOR WHATEVER IT WAS WORTH.

2 Q DID HE DO ANYTHING IN A HOSTILE OR THREATENING
3 MANNER?

4 A NOT AT FIRST. THOUGH HE DID AT ONE POINT
5 BADGER GRACE MC GUIRE FOR NO APPARENT REASON ABOUT HER
6 INVOLVEMENT WITH THE CHURCH.

7 Q NOW, OVER THE BRIEF PERIOD OF TIME -- I
8 RECOGNIZE THAT YOU ONLY KNEW MR. MULL SLIGHTLY.

9 A RIGHT.

10 Q WITH YOUR SLIGHT KNOWLEDGE OF HIM, WOULD YOU
11 SAY HE IS SOMEWHAT OF A TIGER, PRETTY VICIOUS AND IS ALWAYS
12 ON THE ATTACK, OR WOULD YOU DESCRIBE HIM AS A RATHER GENTLE,
13 MEEK, WITHDRAWN SORT OF GENTLEMAN?

14 A I DETECT A CONSIDERABLE DIFFERENCE IN HIS
15 BEHAVIOR NOW THAN I DID A FEW YEARS AGO WHEN HE WAS ON
16 STAFF. HE WAS -- MY IMPRESSION OF HIM AT THAT TIME WAS THAT
17 HE CERTAINLY SEEMED TO BE A RATHER VAIN INDIVIDUAL WHO
18 DIDN'T HESITATE TO ASSERT HIS PREROGATIVES WHATEVER THEY
19 MIGHT BE.

20 Q THAT IS VERY NICE, BUT LET'S GO BACK TO MY
21 QUESTION.

22 WOULD YOU DESCRIBE HIM DURING THE TIME THAT YOU
23 KNEW HIM AT CAMELOT AS BEING AN AGGRESSIVE, ASSERTIVE, ANGRY
24 SORT OF PERSON?

25 A FROM MY OWN PERSONAL EXPERIENCE, I HAVE NO
26 KNOWLEDGE WITH WHICH I CAN ANSWER THAT.

27 Q WHEN HE SHOWED UP AT THE SQUARE DANCE, DID YOU
28 GET THE IMPRESSION WHEN HE WAS WALKING UP TO MEET MR. ED

1 FRANCIS, WHO YOU TOLD US WAS WALKING UP TOWARDS THE GUARD
2 SHACK, DID HE APPEAR TO BE ON THE WARPATH?

3 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
4 AMBIGUOUS, YOUR HONOR.

5 THE COURT: HE MAY ANSWER.

6 THE WITNESS: WE WERE -- IN THE CONTEXT OF THE EVENTS
7 THAT WE WERE AWARE OF, PARTICULARLY THE NEWSPAPER ARTICLES
8 AND SO FORTH, WE HAD EVERY REASON TO BELIEVE, YES.

9 Q BY MR. LEVY: EXCUSE ME, SIR. I AM ASKING
10 ABOUT WHAT YOU OBSERVED WHEN HE CAME WALKING UP.

11 A I HAD NO WAY OF TELLING ANYTHING OTHER THAN THE
12 FACT THAT THEY WERE WALKING TOWARDS US.

13 Q THAT IS EXACTLY MY POINT.

14 A RIGHT.

15 Q WHEN YOU COULD TELL NOTHING -- WHEN THEY WERE
16 WALKING TOWARD YOU, I JUST WANT TO KNOW WHETHER OR NOT YOU
17 COULD TELL WHETHER HE WAS WALKING UP THERE ANGRILY, OR AS A
18 FRIEND OR AS A PERSON YOU DESCRIBED TO US WHO TOLD YOU HE
19 CAME TO GO SQUARE DANCING?

20 A I HAD NO REASON -- NO KNOWLEDGE WITH WHICH TO
21 EVALUATE ANYTHING OTHER THAN THE FACT THAT THERE WAS A LARGE
22 GROUP OF PEOPLE WALKING TOGETHER AS A GROUP, WHICH IN ITSELF
23 WAS UNUSUAL.

24 AND I KNEW WHO THE INDIVIDUALS WERE IN THIS
25 CASE. I CERTAINLY KNEW WHO FOUR OF THEM WERE, ALL OF THEM
26 WHOM I HAD GOOD REASON TO BELIEVE WERE HOSTILE TO THE
27 CHURCH. SO IT DOESN'T SEEM UNUSUAL FOR ME TO CONCLUDE THAT
28 THERE MAY HAVE BEEN -- THERE MAY BE SOME SORT OF VENDETTA IN

1 PROGRESS.

2 Q I THINK YOU DESCRIBED THAT THIS GENTLEMAN, AND
3 HIS DAUGHTER, AND A LADY, AND HER HUSBAND --

4 A RIGHT.

5 Q -- AND A MAN AND A LADY FROM A NEWSPAPER WERE
6 WALKING IN?

7 A RIGHT.

8 Q NOW, WAS IT JUST MR. MULL WHO APPEARED TO BE IN
9 THE THROES OF HIS VENDETTA, OR DID ALL THE PEOPLE WHO WERE
10 COMING IN -- THE PRESS, BILL MALEK'S MOTHER AND DAD AND THE
11 LADY FROM THE NEWSPAPER -- WERE THEY ON A VENDETTA ALSO OR
12 WERE THEY JUST PEOPLE WALKING INTO CAMELOT?

13 A THE PEOPLE INVOLVED, IN PARTICULAR MR. MULL AND
14 MR. AND MRS. MALEK, HAD DEMONSTRATED OVER SOME PERIOD OF
15 TIME THAT THEY WERE QUITE HOSTILE TO THE CHURCH AND THAT WAS
16 EASY TO -- EVERYONE COULD EASILY BE AWARE OF THAT.

17 AT THAT POINT NOT ONLY HAD THERE BEEN NUMEROUS
18 NEWSPAPER ARTICLES, EVEN 60 MINUTES HAD DEVOTED A PROGRAM TO
19 THE ISSUE, AND THERE WERE -- OBVIOUSLY THERE WAS A GREAT
20 DEAL OF EVIDENCE OF THE FEELING TOWARD THE CHURCH OF THESE
21 PARTICULAR INDIVIDUALS. SO THAT IS WHAT IT WAS BASED ON.

22 Q WELL NOW, MR. AND MRS. MALEK, AT THAT TIME THEY
23 HADN'T SUED THE CHURCH, HAD THEY?

24 A I AM NOT AWARE THAT THEY HAD.

25 Q THEIR ONLY CONCERN WAS THEIR SON, WHO THEY WERE
26 NOT SEEING WHO WAS A MEMBER OF THE CHURCH; IS THAT CORRECT?

27 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCE
28 OF THAT AND TO COUNSEL'S STATEMENTS, YOUR HONOR.

1 THE COURT: OVERRULED.

2 THE WITNESS: AS TO WHETHER -- WHAT HER MOTIVES WERE,
3 I HAVE NO WAY OF EVALUATING THAT. AS TO WHAT SHE ACTUALLY
4 DID AND WHAT WAS ACTUALLY THE SUBSTANCE OF HER ACTIONS, THAT
5 WAS OBVIOUSLY HOSTILE TO THE CHURCH. THAT IS AS FAR AS MY
6 JUDGMENT IS GOING. I AM NOT EVALUATING HER MOTIVES. I AM
7 JUST SAYING THAT SHE WAS HOSTILE AND IT WAS CLEAR THAT SHE
8 WAS.

9 Q BY MR. LEVY: WHEN SHE WAS --

10 THE COURT: MR. KENYON, YOU USED THE WORD "HOSTILE."
11 LET ME ASK YOU A QUESTION. ISN'T IT POSSIBLE THAT SOMEBODY
12 CAN BE HOSTILE AND HAVE NO PROPENSITY FOR VIOLENCE?

13 THE WITNESS: OH, I AM SURE IT IS.

14 THE COURT: ISN'T IT POSSIBLE THAT SOMEBODY CAN BE
15 HOSTILE, BUT PRESENT NO DANGER OF CREATING A DISTURBANCE OR
16 MOLESTING ANYBODY ELSE?

17 THE WITNESS: NO DOUBT.

18 THE COURT: PARDON THE INTERRUPTION.

19 MR. LEVY: THANK YOU, YOUR HONOR.

20 Q WHILE YOU WERE ON PERMANENT STAFF AT CHURCH
21 UNIVERSAL AND TRIUMPHANT, DID YOU EVER HAVE OCCASION TO
22 LISTEN TO THE TWO AND A HALF HOUR TAPE THAT WAS THE
23 CONCLUDING CONVERSATION BETWEEN ELIZABETH CLARE PROPHET, ED
24 FRANCIS, MONROE SHEARER AND GREGORY MULL?

25 A NO, I DID NOT.

26 Q TO YOUR KNOWLEDGE, WAS THAT TWO AND A HALF HOUR
27 CONVERSATION PLAYED FOR THE MEMBERS OF THE CHURCH?

28 A I HAVE NO KNOWLEDGE OF THE CONVERSATION TO

1 WHICH YOU REFER.

2 Q DO YOU ATTEND -- AT THAT TIME, DID YOU ATTEND
3 REGULAR STAFF MEETING?

4 A I ATTENDED MANY OF THEM, YES, MOST OF THEM.

5 Q IS IT YOUR TESTIMONY TODAY THAT YOU HAVE NEVER
6 SEEN OR HEARD OR PARTICIPATED WHEN THERE WAS A DISCUSSION OF
7 THAT TWO AND A HALF HOUR CONVERSATION BETWEEN GREGORY AND
8 THE PEOPLE I JUST MENTIONED?

9 A THAT'S RIGHT.

10 Q DID YOU EVER HEAR ANY DISCUSSION, WHETHER AT A
11 REGULAR MEETING, ANYWHERE ELSE, FROM ANY MEMBER OF THE
12 CHURCH?

13 A OH, I AM SURE I DID.

14 Q OH, YOU ARE SURE YOU DID. AND WHEN WAS THAT?

15 A I CAN'T REMEMBER PRECISELY. THERE WERE
16 NUMEROUS CONVERSATIONS JUST AS THERE ARE SUCH CONVERSATIONS
17 AROUND ANY GROUP. OBVIOUSLY WE TALKED ABOUT THE SITUATION
18 AND I HEARD PEOPLE DISCUSS IT.

19 Q DO YOU HAVE ANY RECOLLECTION THAT AS PART OF
20 THAT TWO AND A HALF HOUR CONVERSATION, THERE WAS A LITTLE
21 DIALOGUE WHERE ELIZABETH TOLD GREGORY ABOUT ANANIAS AND
22 SAPPHIRA?

23 A I HAVE NO KNOWLEDGE OF THE CONVERSATION TO
24 WHICH YOU REFER.

25 THE COURT: SHALL WE TAKE OUR AFTERNOON RECESS AT
26 THIS TIME?

27 (RECESS.)

28 THE COURT: PLEASE PROCEED.

1 Q BY MR. LEVY: JUST A COUPLE OF MORE QUESTIONS,
2 MR. KENYON.

3 WE TALKED ABOUT PEOPLE WHO WERE HOSTILE TO THE
4 CHURCH. YOU ARE NOT HOSTILE TO THE CHURCH, ARE YOU?

5 A THAT'S RIGHT.

6 Q YOU FEEL IT IS YOUR OBLIGATION AND
7 RESPONSIBILITY TO DEFEND THE CHURCH?

8 A IT IS MY DESIRE TO DEFEND THE CHURCH, YES.

9 Q AND YOU WOULD DO WHATEVER YOU THOUGHT WAS RIGHT
10 AND PROPER IN YOUR DEFENSE OF THE CHURCH?

11 A THAT'S CORRECT.

12 Q AND IF THERE WAS SOMEONE THAT THE CHURCH -- THE
13 LEADERS OF THE CHURCH TOLD YOU WAS HOSTILE TO THE CHURCH,
14 YOU'D TRUST AND BELIEVE WHATEVER THE LEADERS OF THE CHURCH
15 TOLD YOU, WOULD YOU NOT?

16 A IT WOULD DEPEND ON THE SITUATION.

17 Q IF ELIZABETH WERE TO TELL YOU THAT SOMEONE WAS
18 HOSTILE TO THE CHURCH, WOULD YOU DEMAND AN EXPLANATION OF
19 HER WITH REGARD TO ALL THE DETAILS OR WOULD YOU ACCEPT HER
20 WORD AT FACE VALUE?

21 A IT WOULD DEPEND ON WHETHER OR NOT I HAD
22 KNOWLEDGE OF MY OWN WHICH TENDED TO SUGGEST OTHERWISE. BUT
23 LACKING THAT, I WOULD NATURALLY GO -- TEND TO BELIEVE THAT
24 SHE WAS TELLING ME THE TRUTH. I SEE NO REASON TO DOUBT
25 ANYTHING SHE MIGHT SAY TO ME IN THAT REGARD.

26 Q WITH REGARD TO MR. MULL?

27 A YES.

28 Q DID ELIZABETH CLARE PROPHET TELL YOU THAT HE

1 WAS AN ENEMY, AN ENEMY HOSTILE TO THE CHURCH?

2 A NO, SHE NEVER DID.

3 Q WOULD IT BE A FAIR STATEMENT THAT THE VAST
4 MAJORITY OF THE PEOPLE ASSOCIATED WITH CHURCH UNIVERSAL AND
5 TRIUMPHANT CONSIDER GREGORY MULL A THREAT TO THE CHURCH?

6 MR. KLEIN: I AM GOING TO OBJECT IT CALLS FOR A
7 CONCLUSION, YOUR HONOR.

8 THE COURT: SUSTAINED.

9 Q BY MR. LEVY: PREDICATED UPON WHAT YOU HEARD,
10 UNDERSTOOD AND BELIEVED, DID YOU CONSIDER MR. GREGORY MULL A
11 THREAT TO THE CHURCH?

12 A I CONSIDERED HIM AN INDIVIDUAL WHO CERTAINLY
13 DID NOT HAVE THE BEST INTERESTS OF THE CHURCH AT HEART, YES.

14 Q IS THAT THE SAME THING AS WHAT I SAID?

15 A WELL, I MIGHT MAKE IT STRONGER THAN THAT.

16 MR. LEVY: NOTHING FURTHER.

17 MR. KLEIN: THANK YOU, YOUR HONOR.

18

19 REDIRECT EXAMINATION +

20 BY MR. KLEIN:

21 Q MR. KENYON, YOU SAID YOU WOULD DEFEND YOUR
22 CHURCH. WOULD YOU UNDER ANY CIRCUMSTANCES LIE TO THIS JURY
23 IN ORDER TO DEFEND YOUR CHURCH?

24 A NO, I WOULD NOT.

25 Q WOULD YOU DO ANYTHING THAT YOU CONSIDERED TO BE
26 DISHONEST IN ORDER TO DEFEND YOUR CHURCH?

27 A NO, I WOULD NOT. AND I WOULD LIKE TO EXPLAIN,
28 IF I MIGHT, THAT ONE OF THE REASONS I AM IN THIS CHURCH IS

1 BECAUSE IT REINFORCES MY BELIEFS OF WHAT'S RIGHT AND BECAUSE
2 I BELIEVE THAT I CAN BELIEVE IN THIS CHURCH. AND AS LONG AS
3 I FIND EVIDENCE FOR THAT, I WILL BEHAVE THAT WAY. IF I SAW
4 SOMETHING TO INDICATE THAT I WAS WRONG, I MIGHT CHANGE MY
5 OPINION. BUT I HAVEN'T SEEN IT YET.

6 Q WITH RESPECT TO THE INCIDENT IN APRIL OF 1981,
7 DURING THE COURSE OF THAT CONVERSATION WHEN ED FRANCIS BEGAN
8 TO SPEAK TO MR. MULL, DID MR. FRANCIS RAISE HIS VOICE?

9 A NO, HE DID NOT.

10 Q DID MR. FRANCIS THREATEN MR. MULL IN ANY WAY?

11 A NO, HE DID NOT.

12 Q DID HE MAKE ANY THREATENING GESTURES TOWARDS
13 MR. MULL?

14 A NO.

15 Q WE'VE USED THE TERM "HOSTILE MANNER." DID MR.
16 FRANCIS DISPLAY, AS FAR AS YOU WERE CONCERNED FROM WHAT YOU
17 SAW, A HOSTILE ATTITUDE TOWARDS MR. MULL OTHER THAN TELLING
18 HIM HE HAD TO LEAVE?

19 A NO. IT WAS QUITE BUSINESS LIKE.

20 MR. KLEIN: THANK YOU.

21 I HAVE NO FURTHER QUESTIONS.

22 MR. LEVY: NOTHING FURTHER FOR THIS WITNESS, YOUR
23 HONOR.

24 THE COURT: ALL RIGHT. YOU ARE EXCUSED.

25 MR. KLEIN: EUGENE GARCIA.

26 MR. LEVY: WHILE WE ARE WAITING FOR THAT WITNESS TO
27 COME IN, YOUR HONOR, I WOULD LIKE TO OFFER EXHIBIT 56 INTO
28 EVIDENCE. THAT IS THE MEMORANDUM SIGNED BY LUCINDA MANN AND

1 THE OTHER PARTIES IN THE ARCHITECTURAL DEPARTMENT.

2 THE COURT: ALL RIGHT. 56 IS RECEIVED.

3 (RECEIVED EVID: ^ EXHIBIT 56, MEMORANDUM)

4 MR. KLEIN: YOUR HONOR, I WOULD ALSO OFFER EXHIBITS
5 87, 88, 90 AND 111 INTO EVIDENCE.

6 THE COURT: THEY ARE RECEIVED. 87, 88, 90 AND 111?
7 IS THAT CORRECT?

8 MR. KLEIN: YES, YOUR HONOR.

9 THE COURT: ALL RIGHT. THEY ARE RECEIVED.

10 (RECEIVED EVID: ^ EXHIBITS 87, 88 AND

11 - - - - - ^ 90, PHOTOGRAPHS;

12 - - - - - ^ 111, CHART)

13 MR. KLEIN: THANK YOU, YOUR HONOR.

14

15 EUGENE GARCIA, +

16 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,

17 TESTIFIES AS FOLLOWS:

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

19 SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL

20 YOUR NAME.

21 THE WITNESS: MY NAME IS EUGENE GARCIA. E-U-G-E-N-E,

22 G-A-R-C-I-A.

23 THE CLERK: THANK YOU.

24

25 DIRECT EXAMINATION +

26 BY MR. KLEIN:

27 Q I THINK YOU HAVE A PROBLEM THAT NO ONE ELSE HAS

28 HAD. YOU HAVE TO SIT BACK.

1 A OH, I SEE. HOW IS THAT?

2 Q ALL DAY WE HAVE HAD EXACTLY THE OPPOSITE.

3 THE COURT: THAT SHOULD BE FINE.

4 THE WITNESS: THANK YOU.

5 Q BY MR. KLEIN: YOU WOULD BE THE PERSON WITH THE
6 LOUDEST VOICE AND THE BIGGEST OF ALL WHO SITS CLOSEST TO THE
7 MICROPHONE.

8 MR. GARCIA, ARE YOU A STAFF MEMBER OF CHURCH
9 UNIVERSAL AND TRIUMPHANT?

10 A YES, I AM. OKAY.

11 Q HOW LONG HAVE YOU BEEN A STAFF MEMBER?

12 A ABOUT EIGHT YEARS.

13 Q AND PRIOR TO BECOMING AFFILIATED WITH CHURCH
14 UNIVERSAL AND TRIUMPHANT, WERE YOU EMPLOYED?

15 A YES, I WAS.

16 Q WHAT EMPLOYMENT DID YOU HAVE?

17 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR.
18 RELEVANCE.

19 THE COURT: HE CAN ANSWER.

20 THE WITNESS: WHAT EMPLOYMENT I HAD? I WAS A
21 COUNSELOR. I WORKED IN THE COMMUNITY, COMMUNITY COUNSELING,
22 MEXICAN-AMERICAN COMMUNITY, SOCIAL WORKER.

23 Q BY MR. KLEIN: AND HAD YOU SERVED IN THE UNITED
24 STATES ARMY?

25 A YES, I HAVE.

26 Q WERE YOU HONORABLY DISCHARGED?

27 A YES, I WAS.

28 Q NOW, I'D LIKE TO DIRECT YOUR ATTENTION TO THE

1 DAY OF THE SQUARE DANCE IN APRIL OF 1981.

2 WERE YOU AT CAMELOT ON THAT DAY?

3 A YES, I WAS.

4 Q WERE YOU WORKING AT YOUR JOB ON THAT DAY?

5 A YES.

6 Q WHAT WAS YOUR JOB?

7 A SECURITY INFORMATION, DIRECTING TRAFFIC,
8 ANSWERING PHONES.

9 Q DO YOU WORK IN THAT GUARDHOUSE THAT IS ABOUT
10 760 FEET FROM THE GATE TO THE CAMELOT PROPERTY?

11 MR. LEVY: I AM GOING TO HAVE TO OBJECT TO THE
12 STATEMENT, YOUR HONOR, AS MISCHARACTERIZING THE EVIDENCE.
13 HE'S JUST ENTERED INTO EVIDENCE AN EXHIBIT THAT SAYS IT IS
14 705 FEET.

15 THE COURT: PLEASE REPHRASE IT.

16 MR. KLEIN: I APOLOGIZE FOR THE 55 FEET.

17 Q DO YOU WORK AT THE GUARDHOUSE OR WERE YOU
18 WORKING AT THE GUARDHOUSE THAT IS ABOUT 705 FEET FROM THE
19 GATE LEADING INTO THE CAMELOT PROPERTY?

20 A YES, I WAS.

21 Q AND BY THE WAY, WHEN YOU WORKED IN THAT
22 GUARDHOUSE, DID YOU CARRY ANY KIND OF WEAPON?

23 A NO.

24 Q WERE YOUR DUTIES ON THE DATE IN QUESTION IN
25 APRIL OF 1981 ANY DIFFERENT FROM WHAT YOUR NORMAL DUTIES
26 WOULD BE WORKING IN THAT GUARDHOUSE?

27 A NO.

28 Q NOW, DID THERE -- WITHDRAWN.

1 DO YOU KNOW GREGORY MULL OR DID YOU KNOW HIM IN
2 APRIL OF 1981?

3 A I HAD SEEN HIM COME THROUGH THE GATE
4 OCCASIONALLY AND I KNEW HIM -- YEAH, I KNEW HIM. I HAD SEEN
5 HIM.

6 Q AND ON THAT DATE OF THE SQUARE DANCE IN APRIL
7 OF 1981, DID THERE COME A TIME WHEN YOU SAW GREGORY MULL
8 COME ONTO THE CHURCH PROPERTY?

9 A REPEAT THAT, PLEASE.

10 Q OKAY. ON THE DATE OF THE SQUARE DANCE IN APRIL
11 OF 1981, DID THERE COME A TIME WHEN YOU SAW GREGORY MULL?

12 A THAT DAY, YES.

13 Q AND WHERE WAS HE WHEN YOU FIRST SAW HIM?

14 A I RECOGNIZED HIS CAR. IT WAS AT THE BEGINNING
15 OF THE MAIN GATE, WHICH IS A FENCE, AND ANOTHER CAR THAT
16 CAME IN AND HE STARTED WALKING IN.

17 Q AND DID HE WALK IN OR DID HE DRIVE IN FROM THAT
18 MAIN GATE?

19 A HE WALKED IN.

20 Q WERE THERE OTHER PEOPLE WITH HIM?

21 A YES, THERE WAS.

22 Q AND WHEN HE BEGAN WALKING IN, WHERE EXACTLY
23 WERE YOU?

24 A I WAS AT -- I WAS IN THE GUARDHOUSE.

25 Q WHO ELSE WAS IN THE VICINITY OF THE GUARDHOUSE
26 WHEN YOU FIRST SAW MR. MULL WALKING INTO THE PROPERTY?

27 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. COUNSEL
28 IS LEADING HIS WITNESS.

1 THE COURT: WELL, THIS LAST QUESTION -- HE HAS BEEN,
2 BUT THIS LAST QUESTION IS NOT LEADING.

3 MR. LEVY: WELL, HE SAID WHO ELSE WAS PRESENT AT THE
4 GUARDHOUSE AND THERE HAS NOT BEEN ESTABLISHED THAT ANYBODY
5 WAS -- OTHER THAN THIS WITNESS WAS THERE.

6 THE COURT: IF ANYBODY. HE'S BEEN LEADING, BUT THIS
7 QUESTION IS OKAY.

8 MR. LEVY: I WILL TRY TO BE QUICKER ABOUT IT.

9 Q BY MR. KLEIN: WHO, IF ANYBODY, WAS PRESENT IN
10 THE VICINITY OF THE GUARDHOUSE WHEN YOU SAW MR. MULL?

11 A DOUG KENYON, PAULA ZARZYCKI, SUSAN MC ADAMS,
12 AND GRACE MC GUIRE AND I BELIEVE TOM MILLER WAS THERE.

13 Q AND WHEN YOU SAW MR. MULL WALK ONTO THE
14 PROPERTY, WHAT, IF ANYTHING, DID YOU DO?

15 A I NOTIFIED EDWARD FRANCIS.

16 Q HOW DID YOU NOTIFY HIM?

17 A THROUGH THE PHONE.

18 Q AND DID THERE COME A TIME WHEN MR. FRANCIS CAME
19 TO THE VICINITY OF THE GUARDHOUSE?

20 A YES.

21 Q AND DID THERE COME A TIME WHEN MR. MULL ALSO
22 CAME INTO THE VICINITY OF THE GUARDHOUSE?

23 A YES. THEY ARRIVED AT THE SAME TIME AT THE
24 GUARDHOUSE.

25 Q AND ONCE THEY ARRIVED, AS BEST YOU CAN, TELL US
26 WHAT HAPPENED.

27 A WELL, EDWARD SAID, "I'M SORRY, YOU ARE NOT
28 WELCOME," TO GREGORY MULL.

1 Q WHAT DID GREGORY MULL SAY?

2 A "WELL, I WANT TO GO TO THE SQUARE DANCE."

3 Q AND AS BEST YOU CAN, CAN YOU TELL US WHAT THE
4 CONVERSATION -- WHAT YOU CAN REMEMBER, IF ANYTHING, OF THE
5 CONVERSATION EITHER EXACTLY OR IN SUBSTANCE?

6 A WELL, WHEN EDWARD SAID, "YOU ARE NOT WELCOME,"
7 HE SEEMED TO START GETTING MAD.

8 Q WHO GOT MAD?

9 A OR FRUSTRATED. MR. MULL.

10 Q AND DO YOU RECALL ANYTHING IN PARTICULAR THAT
11 MR. MULL SAID AT THAT POINT?

12 A HE STARTED JUMPING UP AND DOWN LIKE, I GUESS, A
13 MONKEY WOULD OR SOMETHING. YOU KNOW. "GOD WILL JUDGE YOU,"
14 YOU KNOW. THAT IS WHAT I PICTURE. IT WAS JUMPING UP AND
15 DOWN.

16 Q AND DID MR. FRANCIS SAY ANYTHING ELSE THAT YOU
17 CAN REMEMBER?

18 A NO, NO. THAT IS ALL I CAN REMEMBER.

19 Q IS THERE ANYTHING ELSE THAT MR. MULL SAID?

20 A NO. AS FAR AS I KNOW, THEY WENT A LITTLE BIT
21 FURTHER THAN THE GATE AT THAT TIME AND I HAD A PHONE CALL AT
22 THAT POINT.

23 Q NOW, WHILE THEY WERE TALKING, WHAT WERE YOU
24 DOING?

25 A I WAS ANSWERING THE PHONE, DIRECTING TRAFFIC,
26 JUST MAKING SURE THE TRAFFIC WAS GOING BY PROPERLY.

27 Q WHEN YOU SAY "DIRECTING TRAFFIC" --

28 A WELL, WE HAD A SQUARE DANCE GOING ON.

1 Q WERE PEOPLE DRIVING IN IN CARS?

2 A OCCASIONALLY, YES. IT WAS WELL UNDER WAY AT
3 THIS POINT.

4 Q DURING THE COURSE OF THE TIME THAT MR. FRANCIS
5 WAS SPEAKING TO MR. MULL, DID ANY OTHER INDIVIDUALS WHO WERE
6 CHURCH MEMBERS OR AFFILIATED WITH THE CHURCH COME INTO THE
7 AREA WHERE THE GUARDHOUSE IS?

8 A AT THAT TIME?

9 Q DURING THE TIME THEY SPOKE.

10 A I BELIEVE TOM MILLER DID. HE IS THE ONE THAT
11 CAME LATER I BELIEVE.

12 Q OTHER THAN MR. MILLER, DID ANY OTHER
13 INDIVIDUALS WHO WERE CHURCH MEMBERS OR AFFILIATED WITH THE
14 CHURCH COME INTO THE VICINITY OF WHERE THIS MEETING OR
15 INCIDENT WAS OCCURRING OTHER THAN THE PEOPLE YOU'VE ALREADY
16 TOLD US ABOUT?

17 A I DON'T RECALL.

18 Q IS IT THAT YOU DON'T RECALL OR YOU DON'T RECALL
19 ANY OTHERS?

20 A I DON'T REMEMBER. JUST THE ONES I MENTIONED,
21 THE NAMES THAT I MENTIONED.

22 Q NOW, PERHAPS YOU CAN GET UP AND, WITH THE
23 COURT'S PERMISSION, YOU CAN POINT OUT TO US SOME OF THIS ON
24 WHAT'S BEEN MARKED NUMBER 111 IN EVIDENCE.

25 - IS THAT --

26 THE COURT: SURE. THAT IS ALL RIGHT.

27 Q BY MR. KLEIN: THAT IS THE CHART OVER THERE.
28 YOU CAN GO OVER THERE AND THERE IS A POINTER THERE WHICH

1 WILL HELP YOU TO SHOW US WHAT HAPPENED.

2 NOW, CAN YOU TELL US WHERE THE GUARDHOUSE IS?
3 DO YOU SEE IT ON THAT?

4 A IT IS RIGHT HERE (POINTING).

5 Q AND CAN YOU TELL US WHERE EDWARD FRANCIS AND
6 MR. MULL WERE WHEN THEY FIRST BEGAN SPEAKING?

7 A IN THIS VICINITY (POINTING). MORE IN THE
8 MIDDLE.

9 Q POINTING IN THE AREA OF THE "M" AND THE "F"?

10 A YES.

11 Q NOW, DID THEY REMAIN IN THAT SAME SPOT DURING
12 THE COURSE OF THE TIME THAT THEY SPOKE OR DID THEY MOVE?

13 A THEY MIGHT HAVE MOVED A FEW FEET THIS WAY A
14 LITTLE BIT MORE AND I BELIEVE IT WAS ONE TIME THEY MOVED
15 OVER HERE, BUT THEY FINALLY STAYED OVER IN THIS AREA
16 (POINTING) AS I REMEMBER.

17 Q IT WAS IN THE GENERAL AREA OF THE GUARDHOUSE?

18 A RIGHT.

19 Q BUT YOU BELIEVED THEY MOVED A LITTLE BIT DOWN
20 ON THAT?

21 A YEAH, BECAUSE THERE WAS TRAFFIC COMING IN.

22 Q THEY MOVED DOWN TO AVOID BEING HIT BY CARS?

23 A RIGHT.

24 Q NOW, AT ANY TIME DURING THE PERIOD THAT MR.
25 MULL WAS SPEAKING TO MR. FRANCIS, DID 12 CHURCH MEMBERS,
26 MEN, COME UP AND FORM A LINE IN THAT STREET?

27 A NO.

28 Q DID A LESSER NUMBER OF CHURCH MEMBERS COME UP

1 AND FORM A LINE IN THAT STREET?

2 A NO.

3 Q WAS THERE EVER A LINE FORMED BY CHURCH MEMBERS
4 BLOCKING OFF THAT STREET?

5 A NO. JUST THE PEOPLE I MENTIONED BEFORE WERE
6 THERE.

7 Q AND WITH RESPECT TO THE PEOPLE WHOM YOU
8 MENTIONED, THE WOMEN AND MR. MILLER, MR. KENYON, YOURSELF,
9 AS BEST AS YOU CAN RECALL, WHERE WERE THOSE PEOPLE? WHERE
10 WERE YOU WHILE THEY WERE TALKING?

11 A WELL --

12 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT IS
13 NOT ONLY COMPOUND, COMPLEX, VAGUE, AMBIGUOUS. HE IS TALKING
14 ABOUT SIX DIFFERENT PEOPLE; AND NOT ONLY WHERE THEY WERE,
15 BUT WHERE THIS GENTLEMAN WAS.

16 THE COURT: WHY DON'T YOU REPHRASE IT.

17 Q BY MR. KLEIN: DURING THE PERIOD OF TIME THAT
18 MR. FRANCIS AND MR. MULL WERE TALKING, DID YOU START OFF --
19 SHOW US WHERE YOU STARTED OFF.

20 A RIGHT IN HERE (POINTING).

21 Q NOW, DID YOU HAVE OCCASION TO MOVE ANYWHERE
22 FROM THAT GUARDHOUSE WHERE YOU ARE POINTING DURING THE
23 COURSE OF THAT CONVERSATION?

24 A YES. OCCASIONALLY.

25 Q WHERE WOULD YOU MOVE?

26 A RIGHT TO THE SIDE.

27 Q YOU ARE POINTING RIGHT TO THE SIDE?

28 A RIGHT.

1 Q NOW WITH RESPECT TO MR. KENYON, DO YOU RECALL
2 WHERE HE WAS WHEN MR. FRANCIS AND MR. MULL BEGAN TO SPEAK
3 WITH EACH OTHER?

4 A I BELIEVE HE MOVED INTO THIS AREA (POINTING) IF
5 I RECALL WELL.

6 Q SORT OF ABOVE THE "M"?

7 A RIGHT.

8 Q WITH RESPECT TO THE WOMEN YOU MENTIONED --

9 A EXCUSE ME. IT WAS RIGHT BETWEEN THE "M" AND
10 THE "F."

11 Q MR. KENYON?

12 A YES.

13 Q BUT WAS HE STANDING BETWEEN MR. MULL AND MR.
14 FRANCIS?

15 A NOT BETWEEN THEM, NO, BUT OFF TO THE SIDE RIGHT
16 AROUND HERE (POINTING), BY THE FOUR.

17 Q WITH RESPECT TO THE WOMEN, PAULA ZARZYCKI, DO
18 YOU RECALL WHERE SHE WAS STANDING WHEN MR. FRANCIS BEGAN TO
19 SPEAK TO MR. MULL?

20 A IF I RECALL -- YEAH. SHE WAS RIGHT HERE. I
21 REMEMBER NOW. RIGHT IN THIS AREA (POINTING).

22 Q POINTING BELOW THE "K"?

23 A YEAH. RIGHT AROUND THIS AREA RIGHT HERE AROUND
24 THE "K".

25 Q THERE WAS A MISS MC ADAMS. DO YOU RECALL WHERE
26 SHE WAS?

27 A SHE WAS RIGHT IN HERE (POINTING).

28 Q YOU ARE ALSO POINTING NOW SORT OF BETWEEN THE

1 "K" AND THE GUARDHOUSE?

2 A YEAH.

3 Q BY THE WAY, ARE YOU A JUDO EXPERT?

4 A NO.

5 Q DO YOU KNOW JUDO?

6 A NO.

7 Q DURING THE COURSE OF THE CONVERSATION BETWEEN
8 MR. FRANCIS AND MR. MULL, DID YOU SAY ANYTHING?

9 A NO.

10 Q HOW CLOSE WAS THE CLOSEST THAT MR. FRANCIS WAS
11 TO MR. MULL DURING THE COURSE OF THAT CONVERSATION?

12 A IT VARIED. THREE TO FIVE FEET. SOMETIMES IT
13 MIGHT HAVE BEEN THREE, SOMETIMES FIVE.

14 Q WAS ANYBODY ELSE FROM THE CHURCH SIDE ANY
15 CLOSER TO MR. MULL THAN THE THREE TO FIVE FEET YOU'VE SAID
16 MR. FRANCIS WAS?

17 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
18 HONOR. I AM CONFUSED. I DON'T KNOW WHAT "THE CHURCH SIDE"
19 IS.

20 THE COURT: PLEASE REPHRASE IT.

21 Q BY MR. KLEIN: WAS THERE ANYBODY ELSE WHO WAS
22 EITHER A CHURCH MEMBER OR AFFILIATED WITH THE CHURCH WHO WAS
23 ANY CLOSER TO MR. MULL THAN THE THREE TO FIVE FEET THAT YOU
24 SAID MR. FRANCIS WAS?

25 A NO, I DON'T RECALL. DOUG MIGHT HAVE -- DOUG
26 MIGHT HAVE WENT UP CLOSER.

27 Q MR. KENYON?

28 A YEAH, MR. KENYON.

1 Q DURING THE COURSE OF THE --

2 A OF COURSE MAYBE -- TOM MILLER MIGHT HAVE, TOO.
3 HE WAS THERE FINALLY.

4 Q DURING THE COURSE OF THE TIME THAT MR. MULL WAS
5 ON THE PROPERTY IN THE VICINITY OF THE GUARDHOUSE, DID
6 ANYBODY EVER THREATEN HIM?

7 A NO.

8 Q DID ANYBODY EVER RAISE THEIR HANDS IN ANY KIND
9 OF A GESTURE TOWARDS HIM, A THREATENING GESTURE?

10 A NO.

11 Q DID -- IF OTHER CHURCH MEMBERS OR PEOPLE
12 AFFILIATED WITH THE CHURCH -- AND I AM TALKING ABOUT MORE
13 THAN JUST ONE OR TWO -- WOULD HAVE COME DOWN AND JOINED INTO
14 THIS SITUATION AND BEEN AROUND THE GUARDHOUSE, WOULD YOU
15 HAVE BEEN IN A POSITION TO SEE THEM?

16 A YES.

17 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
18 HONOR. CALLS FOR CONCLUSION. THIS WITNESS HAS ALREADY
19 TESTIFIED HE WAS BUSY DURING A PORTION OF THE TIME.

20 THE COURT: WELL, SUSTAINED.

21 Q BY MR. KLEIN: YOU SAID THAT YOU WERE DIRECTING
22 TRAFFIC?

23 A SURE. YES. I WAS ALWAYS ALERT TO WHAT WAS
24 GOING ON. I WAS AWAKE. I HAD MY EYES OPEN.

25 Q MY QUESTION IS THIS: YOU SAID YOU WERE
26 DIRECTING TRAFFIC AND ANSWERING THE PHONE?

27 A RIGHT.

28 Q DURING THE TIME THAT YOU WERE DOING THAT, WERE

1 YOU ABLE TO KEEP MR. FRANCIS AND MR. MULL WITHIN YOUR
2 VISION?

3 A YES.

4 Q AND DID YOU IN FACT KEEP THEM WITHIN YOUR
5 VISION?

6 A OH, YES.

7 Q WAS IT SOMETHING THAT YOU WERE WATCHING EVEN IF
8 YOU WERE DOING OTHER THINGS?

9 A YES.

10 Q AND DURING THE TIME THAT MR. MULL WAS TALKING
11 TO MR. FRANCIS, TO YOUR KNOWLEDGE, DID ANY OTHER CHURCH
12 MEMBERS OR PEOPLE AFFILIATED WITH THE CHURCH COME DOWN AND
13 JOIN INTO THIS CONVERSATION?

14 A NO.

15 Q DID ANY OTHER CHURCH MEMBERS OR PEOPLE
16 AFFILIATED WITH THE CHURCH COME DOWN THERE AT ALL?

17 A NO, NOT AFTER THOSE SAME FEW THAT I MENTIONED
18 BEFORE. THEY WERE THERE --

19 Q DID MONROE SHEARER --

20 A -- AS FAR AS I KNOW.

21 I DON'T REMEMBER MONROE THERE.

22 Q YOU CAN SIT DOWN NOW.

23 DID THERE -- I WILL WITHDRAW THAT.

24 DURING THE CONVERSATION, DID MR. FRANCIS RAISE
25 HIS VOICE?

26 A NO, HE DIDN'T.

27 Q DURING THE CONVERSATION, DID MR. MULL RAISE HIS
28 VOICE?

1 A YES, HE DID.

2 Q DO YOU RECALL WHAT HE SAID WHEN HE RAISED HIS
3 VOICE?

4 A HE WAS SAYING, "GOD WILL JUDGE YOU." YEAH, IT
5 WAS, "GOD WILL JUDGE YOU."

6 Q DID THERE COME A TIME WHEN THE CONVERSATION
7 ENDED BETWEEN MR. FRANCIS AND MR. MULL?

8 A YES, IT FINALLY DID.

9 Q WHAT HAPPENED?

10 A GREGORY LEFT, YOU KNOW, LEFT FRUSTRATED AND
11 BECAUSE HE COULDN'T GET IN.

12 Q DURING THE YEARS THAT YOU'VE BEEN ASSOCIATED
13 WITH THE CHURCH, HAVE YOU HAD OCCASION TO DECREE?

14 A YES.

15 Q WHAT DOES DECREEING MEAN TO YOU?

16 A DECREEING IS PRAYER, MEDITATION, ALMOST A SONG
17 TO GOD. I WOULD CALL IT A SONG TO GOD, A PRAISE TO GOD.

18 Q WHAT, IF ANY, EFFECT DOES IT HAVE ON YOU TO
19 DECREE?

20 A IT IS GREAT. I THINK IT IS -- WHAT IT AFFECTS
21 ON ME IS INSPIRATION, YOU KNOW. IT IS HEALING. I FEEL I AM
22 A PERFECT EXAMPLE OF THAT IN THE LAST EIGHT YEARS THAT I
23 HAVE BEEN ON THE STAFF. I FEEL HEALTHY, STRONG, ALERT.
24 I -- IT'S GREAT.

25 Q HAVE YOU EVER FELT THAT DECREEING IN ANY WAY
26 LESSENERED YOUR ABILITY TO CONTROL YOUR OWN THOUGHTS AND
27 ACTIONS?

28 A NO. IT HAS ENHANCED THAT.

1 Q IN WHAT WAY?

2 A FOR BEING ALERT, OBJECTIVE, I READ MORE, I HAVE
3 MORE ENERGY, I -- I -- JUST AN OVERALL. I LOVE -- I LIKE
4 ATHLETICS, I LIKE PHYSICAL WORK. IT'S HELPED ME WORK WELL
5 AND DO A LOT OF THINGS A LOT BETTER THAN I DID EIGHT YEARS
6 AGO.

7 Q HOW LONG DID YOU LIVE AT CAMELOT?

8 A I LIVED THERE FOUR YEARS.

9 Q WHAT, IF ANY, EFFECT DID LIVING AT CAMELOT HAVE
10 ON YOU?

11 A WELL, BEING OUT IN THE COUNTRY, IT IS AWAY FROM
12 THE SMOG. LOT OF EUCALYPTUS TREES. IT IS LIKE A PARK
13 ATMOSPHERE. IT IS -- I GREW UP IN THE CITY AREA. IT IS A
14 CHANGE FOR ME, YOU KNOW. IT IS A CHANGE OF PACE.

15 I MEAN IT WAS GREAT. BEING FROM THE MINORITY
16 COMMUNITY, I THOUGHT IT WAS THE GREATEST THING IN THE WORLD.
17 I CAN ADD OTHER THINGS ALSO, BUT THAT IS ONE OF THE REASONS.

18 Q DURING THE TIME YOU WERE AT CAMELOT, YOU HAD
19 SUFFICIENT FOOD, SUFFICIENT SLEEP?

20 A YES. I THOUGHT IT WAS THE BEST. I WAS ALWAYS
21 IN NUTRITION. I ALWAYS STUDIED IT. I THOUGHT IT WAS A VERY
22 HEALTHY DIET.

23 Q WHAT IS THE ROLE OF ELIZABETH CLARE PROPHET IN
24 THE CHURCH?

25 A SHE IS THE SPIRITUAL LEADER OF THE CHURCH.

26 Q DID THE CHURCH HAVE ANY TEACHINGS WITH RESPECT
27 TO HONESTY?

28 A YES. JUST LIKE ANY OTHER CHURCH, THE TEN

1 COMMANDMENTS IS ONE. WE FOLLOW THE TEN COMMANDMENTS. AND
2 THAT IS THE GENERAL PRACTICE OF OUR LAW.

3 Q DURING THE TIME THAT YOU'VE BEEN ASSOCIATED
4 WITH THE CHURCH, HAS ANYONE EVER TOLD YOU TO LIE OR STEAL OR
5 CHEAT FOR THE CHURCH?

6 A NO.

7 Q HAVE YOU EVER HEARD ANY CHURCH OFFICIAL TELL
8 ANYBODY TO LIE OR STEAL OR CHEAT FOR THE CHURCH?

9 A NO.

10 Q DO YOU FEEL THAT IF YOU WANTED TO, YOU WOULD
11 HAVE THE FREE WILL TO JUST LEAVE THE CHURCH TOMORROW?

12 A YES.

13 Q IS THERE ANY QUESTION IN YOUR MIND THAT IF YOU
14 WANTED TO LEAVE TOMORROW, YOU COULD JUST DO IT?

15 A YES.

16 Q MAYBE I -- MR. GARCIA, IS THERE ANY QUESTION IN
17 YOUR MIND IF YOU WANTED TO LEAVE TOMORROW, YOU COULD DO IT?
18 ARE YOU SAYING YES, THERE IS A QUESTION, OR --

19 A NO, THERE ISN'T A QUESTION. EXCUSE ME.

20 Q DURING THE YEARS YOU HAVE BEEN ASSOCIATED WITH
21 THE CHURCH, HAVE YOU EVER HEARD ANY CHURCH OFFICIAL TELL ANY
22 CHURCH MEMBER TO HARASS OR INTIMIDATE THREATEN ANY
23 EX-MEMBER?

24 A THAT IS ALMOST FUNNY. NO.

25 Q WHY IS IT ALMOST FUNNY?

26 A BECAUSE I NEVER HEARD IT SAID OR DONE.

27 MR. KLEIN: THANK YOU.

28 I HAVE NO FURTHER QUESTIONS.

1 MR. LEVY: THANK YOU, YOUR HONOR.

2

3

CROSS-EXAMINATION +

4

BY MR. LEVY:

5

Q MR. GARCIA, YOU TOLD US YOU WORKED IN THAT
6 GUARD SHACK QUITE A BIT.

7

A YES, I DID.

8

Q HOW MANY HOURS A DAY WOULD YOU WORK IN THAT
9 GUARD SHACK?

10

A ANYWHERE FROM EIGHT TO TEN, YOU KNOW, WITH
11 BREAKS AND LUNCH AND THINGS LIKE THAT, YEAH. I COUNT IT
12 ALTOGETHER.

13

Q FIVE DAYS A WEEK?

14

A FIVE TO SIX, YEAH. SOMETIMES SEVEN, YOU KNOW,
15 BECAUSE I REALLY LIKE THE WORK. IT WAS GOOD. I REALLY
16 ENJOYED IT. EXCUSE ME.

17

Q DID — THAT IS OKAY. I WANT TO HEAR WHAT YOU
18 HAVE TO SAY. I DON'T WANT TO INTERRUPT YOU.

19

DID YOU GET PAID FOR WORKING IN THAT GUARD
20 SHACK?

21

A I DIDN'T NEED TO. I HAD MY OWN FUNDS.

22

Q HOW LONG DID YOU ACTUALLY WORK AT THE GUARD
23 GATE — HOW MANY YEARS?

24

A '79 TO '83, ABOUT FOUR YEARS.

25

Q NEVER GOT A PENNY FROM IT?

26

A NO, I DIDN'T, BECAUSE I DEDICATED MY LIFE TO
27 THE SPIRITUAL WAY OF LIFE. I NEVER ASKED FOR ANY PENNY, I
28 DIDN'T ASK FOR ANY PENNY OF IT OR ANY PENNY. I COULD HAVE,

1 BUT I DIDN'T WANT TO BECAUSE I HAD MY OWN FUNDS.

2 Q DID YOU GET ROOM AND BOARD THERE AT CAMELOT?

3 A YES, I DID.

4 Q AND YOUR OWN FUND THAT YOU MENTIONED, WHERE DID
5 THOSE FUNDS COME FROM?

6 A SAVINGS. I HAD A PART-TIME JOB THAT I SAVED UP
7 FOR. I HAD A PAPER ROUTE, YOU KNOW, THINGS LIKE THAT THAT I
8 WOULD DO PART-TIME OR I'D WORK AT DIFFERENT THINGS. I HAD A
9 SAVINGS ACCOUNT, YOU KNOW, A SAVINGS ACCOUNT THAT I HAD
10 SAVED.

11 Q HOW OLD ARE YOU NOW?

12 A THIRTY -- THIRTY-EIGHT.

13 Q HOW OLD WERE YOU WHEN YOU FIRST JOINED THE
14 CHURCH?

15 A TWENTY-SEVEN. NO, THAT WAS -- I GOT TO COUNT.
16 WELL, WHEN I FIRST DISCOVERED THE TEACHINGS OR READING ABOUT
17 THE CHURCH, I WAS ABOUT 27.

18 Q AND WHAT YEAR WAS THAT THAT YOU FIRST JOINED
19 THE CHURCH?

20 A I DON'T KNOW WHAT YOU MEAN BY "JOIN."

21 Q WELL, BECAME AFFILIATED.

22 A AFFILIATED. LIKE HOW?

23 Q STARTED READING THE TEACHINGS AND BEGAN TO LIKE
24 IT AND --

25 A LIKE IT. STARTED READING THE TEACHINGS, YEAH,
26 IT WAS ABOUT IN '77.

27 Q WOULD YOU DO US THE KINDNESS, WOULD YOU GO BACK
28 OVER THERE TO THE BOARD.

1 YOU SAID THERE WAS A TIME WHEN THE GROUP -- ED
2 FRANCIS, GREGORY MULL AND THE OTHER PEOPLE -- MOVED ACROSS
3 THE ROAD. THERE IS A MARKER THERE. I WONDER IF YOU'D BE
4 KIND ENOUGH TO WALK OVER TO THAT CHART AND PUT A LITTLE "X"
5 WHERE IT WAS THEY MOVED ACROSS THE ROAD TO.

6 WITH THE COURT'S PERMISSION.

7 THE COURT: GO AHEAD.

8 THE WITNESS: IS THAT WHAT YOU WANTED, AN "X"?

9 Q BY MR. LEVY: IF YOU WOULD JUST PUT A LITTLE
10 "X" THERE WHERE EVERYBODY MOVED OVER TO ABOUT THE SAME SIZE
11 AS THE "M" OR THE "F" SO WE CAN SEE CLEARLY.

12 A (MARKING).

13 Q NOW WOULD YOU DO ONE OTHER THING FOR ME BEFORE
14 YOU PUT THE MARKER DOWN.

15 THIS GROUP THAT WAS WITH MR. MULL, WOULD YOU
16 PUT A -- DO YOU REMEMBER HOW MANY PEOPLE WERE IN THAT GROUP?

17 A SAY ABOUT FOUR, FOUR PEOPLE.

18 Q WOULD YOU PUT FOUR LITTLE "X'S" BEHIND THE "M."
19 THEY CAN BE A LITTLE BIT SMALLER THAN THE OTHER "X."

20 MR. KLEIN: I AM GOING TO OBJECT. HE HASN'T ASKED
21 HIM WHO THEY WERE. HE JUST ASKED HIM TO PUT THEM BEHIND THE
22 "M."

23 MR. LEVY: WHERE THEY WERE.

24 MR. KLEIN: I ALSO WOULD OBJECT AS TO WHAT TIME HE IS
25 TALKING ABOUT.

26 MR. LEVY: THE DAY OF THE SQUARE DANCE. WHAT OTHER
27 TIME?

28 THE COURT: WAIT A MINUTE. WE ARE NOT GOING TO HAVE

1 A COLLOQUY.

2 WHY DON'T YOU REPHRASE YOUR REQUEST OF THE
3 WITNESS.

4 Q BY MR. LEVY: MR. GARCIA, DO YOU RECALL WHERE
5 THESE FOUR OTHER PEOPLE THAT WERE WITH MR. MULL WERE
6 STANDING DURING THIS VERBAL EXCHANGE BETWEEN MR. MULL AND
7 MR. FRANCIS?

8 A THEY MOVED WHEN ED FRANCIS -- THEY WENT INTO
9 THIS AREA HERE BECAUSE THIS WERE SOME CARS. THEY WERE OVER
10 HERE AWHILE AND THEN THEY CAME OVER HERE (POINTING).

11 Q WHEN THEY WERE OVER THERE FOR A WHILE BEFORE
12 THEY CAME OVER HERE, WOULD YOU PUT SOME "X'S" APPROXIMATELY
13 WHERE THOSE FOUR PEOPLE WERE STANDING?

14 A HERE?

15 Q OVER THERE?

16 A UP HERE. YEAH (MARKING). SOMETHING LIKE THIS.

17 Q AND THERE WERE FOUR OF THEM WITH MR. MULL?

18 A YES, I BELIEVE IT WAS FOUR. I HAVE TO THINK.
19 THERE WAS A REPORTER -- YEAH, IT WAS ABOUT FOUR.

20 Q NOW YOU MENTIONED DOUGLAS KENYON, AND TOM
21 MILLER AND THREE LADIES. WOULD YOU PUT "X'S" WHERE THEY
22 WERE WITH REGARD TO MR. FRANCIS.

23 A ONE --

24 MR. KLEIN: YOUR HONOR, I WOULD JUST ASK FOR THE SAKE
25 OF CLARITY MAYBE HE COULD PUT "O'S" SO WE DON'T HAVE "X'S"
26 ALL OVER AND WE CAN'T TELL WHICH IS WHICH.

27 MR. LEVY: KIND OF LIKE A --

28 THE COURT: IT WOULD HELP.

1 Q BY MR. LEVY: FOR THE PEOPLE WHO WERE WITH THE
2 CHURCH WHO WERE BEHIND MR. FRANCIS, WOULD YOU PUT "O'S" FOR
3 THEM WHERE THEY WERE.

4 A ONE WAS HERE (MARKING) -- I WAS JUST GOING BY
5 MY RECOLLECTION.

6 Q I APPRECIATE THAT. I THANK YOU FOR YOUR HELP.

7 A ONE WAS HERE AND I BELIEVE PAULA WAS OVER HERE
8 (MARKING).

9 Q NOW WHILE YOU ARE UP THERE, CAN YOU TELL ME
10 SOMETHING ABOUT THAT GUARD SHACK? WHEN YOU ARE IN THE GUARD
11 SHACK, IS IT ALL FOUR WALLS MADE OUT OF GLASS COMPLETELY
12 AROUND IT?

13 A THE WALLS MADE OUT OF GLASS?

14 Q YES.

15 A NO. THERE IS WOOD ON THE BOTTOM.

16 Q OKAY. ARE THERE WINDOWS FACING ALL FOUR WAY?

17 A THEN IT COMES UP AND THERE ARE WINDOWS EXCEPT
18 THE BACK SIDE THERE IS A DOOR.

19 Q OKAY. IF YOU WERE IN THE GUARD SHACK AND THE
20 DOOR WERE CLOSED, IS THERE A WINDOW IN THE DOOR?

21 A NO.

22 Q NOW, I SEE ON THAT THING WHAT APPEARS TO BE
23 TREES. DO YOU SEE THOSE KIND OF NICE LITTLE THINGS THERE?

24 FROM YOUR REMEMBRANCE OF THAT AREA BY THE GUARD
25 SHACK, ARE THOSE TREES?

26 A THESE HERE (POINTING)?

27 Q YES.

28 A YES, THEY ARE.

1 Q ARE THEY LITTLE TREES OR BIG TREES?

2 A THEY ARE EUCALYPTUS TREES.

3 Q YOU LOOK AT THE PICTURES RIGHT BEHIND YOU.

4 A BIG TREES, EXCUSE ME, TO ANSWER YOUR QUESTION.

5 Q BIG TREES. IF YOU WERE IN THE GUARD SHACK
6 ANSWERING THE TELEPHONE WITH THE BACK DOOR CLOSED, WOULD YOU
7 BE ABLE TO SEE WHETHER ANYBODY APPROACHED THROUGH THOSE
8 TREES WHILE YOU WERE ANSWERING THE PHONE, DIRECTING TRAFFIC
9 AND DOING ALL THE OTHER THINGS YOU WERE DOING?

10 A EXCUSE ME. I NEED TO GO BACK. I REMEMBER IN
11 '81, WE DIDN'T HAVE ANY WINDOWS ON THAT YET. I AM GLAD THAT
12 YOU BROUGHT IT UP. BUT THERE WAS NO WINDOWS IN THERE, NO
13 GLASS WINDOWS. IT WAS WIDE OPEN.

14 Q WAS THERE A DOOR?

15 A NO, THERE WASN'T A DOOR THEN.

16 Q NO DOOR EITHER?

17 A NO. THE WINDOWS WERE PUT IN IN '83, IN
18 DECEMBER OF -- ACTUALLY, JANUARY OF '83.

19 Q IS THAT TELEPHONE THAT IS IN THERE PUSH-BUTTON
20 TELEPHONE OR A DIAL TELEPHONE?

21 A IT IS A DIAL.

22 Q WHEN YOU MAKE A CALL, DO YOU HAVE TO LOOK AT IT
23 TO SEE WHICH HOLE YOU ARE PUTTING YOUR FINGER IN?

24 A SOMETIMES I COULD AND SOMETIMES I DIDN'T NEED
25 TO BECAUSE I MEMORIZED IT. I WAS ON THE PHONE FOR, WHAT,
26 FOUR YEARS, YOU KNOW. YOU GET TO KNOW ONE THROUGH NINE. IT
27 ALMOST BECOMES AUTOMATIC. IF I HAD TO, I COULD.

28 Q WHEN YOU CALLED --

1 A BUT I WOULD LOOK AT IT ALSO, YOU KNOW. MOST OF
2 THE TIME, IN FACT AT THAT SITUATION, I WOULD LOOK AT THE
3 NUMBERS.

4 Q WHEN YOU CALLED MR. FRANCIS THAT DAY, WHERE DID
5 YOU CALL HIM AT?

6 A I CALLED HIM IN HIS OFFICE. YEAH, I CALLED HIM
7 IN HIS OFFICE.

8 Q WHERE IS HIS OFFICE IN REFERENCE TO WHERE YOUR
9 GUARD SHACK WAS?

10 A IT IS NOT HERE. NOT IN THIS AREA. IT IS ON
11 THE MAIN PART OF THE PROPERTY.

12 Q ABOUT HOW FAR AWAY?

13 A I'D SAY MAYBE 500 YARDS. ACTUALLY -- YEAH,
14 ABOUT 500 YARDS.

15 Q HELP ME IF YOU WOULD. FIVE HUNDRED YARDS, THAT
16 IS ABOUT 1,500 FEET?

17 A YEAH. THAT'S CORRECT. THAT IS A LOT BETTER
18 BECAUSE I KNOW WHAT 1,500 FEET LOOKS LIKE.

19 Q YOU SEE ALL THOSE -- WHERE THOSE "X'S" AND
20 "O'S" ARE, YOU SEE A NUMBER 705 FEET?

21 A RIGHT HERE (POINTING)?

22 Q YES.

23 A UH-HUH.

24 Q NOW, MR. GREGORY MULL WAS WALKING IN THE FRONT
25 GATE, AND HE WAS 705 FEET FROM YOU, AND MR. ED FRANCIS WAS
26 OVER IN HIS OFFICE AND YOU WERE CALLING HIM.

27 WOULD YOU GUESS THAT MR. MULL WOULD GET TO YOUR
28 GUARD SHACK BEFORE MR. FRANCIS WOULD?

1 MR. KLEIN: I AM GOING TO OBJECT. THIS CALLS FOR
2 SPECULATION, YOUR HONOR.

3 THE COURT: PLEASE REPHRASE YOUR QUESTION.

4 Q BY MR. LEVY: WHEN MR. FRANCIS CAME UP, WAS HE
5 RUNNING?

6 A HE WAS WALKING.

7 Q AND WAS -- DID YOU NOTICE WHETHER MR. MULL WAS
8 WALKING OR RUNNING?

9 A HE WAS WALKING, ALSO.

10 Q WAS ONE WALKING FASTER THAN THE OTHER?

11 A ABOUT THE SAME PACE. YEAH, IT WAS ABOUT THE
12 SAME PACE. WHEN YOU LOOK AT IT -- YEAH, IT WAS ABOUT THE
13 SAME PACE. EDWARD MIGHT HAVE BEEN WALKING FASTER. I DON'T
14 KNOW. I THINK IT IS ABOUT -- DOES IT HAVE THE FEET TO THE
15 BRIDGE AREA HIGHER? IT MIGHT BE THE SAME DISTANCE, YOU
16 KNOW.

17 Q I WAS --

18 A THERE IS ANOTHER AREA HERE BECAUSE THERE IS AN
19 AREA I CAN'T SEE. MAYBE -- MAYBE HE WAS JOGGING. I DON'T
20 KNOW. IT IS HARD TO SAY.

21 Q YOU SAY THERE IS AN AREA YOU CAN'T SEE?

22 A YEAH. BETWEEN MAYBE 500 FEET, SO I DON'T KNOW
23 WHAT HE WAS DOING IN THAT CURVE AREA. BY THE TIME HE GOT
24 UP -- THERE IS A LITTLE BRIDGE HERE, THERE IS A STRAIGHT
25 ROAD HERE, YOU KNOW. MAYBE HE GOT A RIDE OR HE RAN. I
26 DON'T KNOW.

27 Q CAME ON HORSEBACK OR ANYTHING?

28 A YEAH. IT'S TRUE.

1 Q WITH ALL THE CARS THAT WERE COMING IN THERE AT
2 THAT TIME, WHEN THE GROUP MOVED OVER TO WHERE THAT "X" WAS,
3 COULD YOU HEAR THEIR CONVERSATION CLEARLY? THAT "X" ON THAT
4 SIDE OF THE ROAD.

5 A NO. I TOLD KEN THAT I COULDN'T HEAR ANYMORE.
6 I DON'T KNOW IF YOU REMEMBER.

7 Q OKAY.

8 A BUT I TOLD HIM I DIDN'T HEAR ANYMORE WHAT THEY
9 WERE TALKING ABOUT OVER HERE.

10 Q I REMEMBER WHAT YOU SAID TO KEN. YOU SAID THAT
11 MR. FRANCIS SAID TO MR. MULL THAT, "YOU ARE NOT WELCOME
12 HERE."

13 A YES.

14 Q AND MR. MULL SAID, "BUT I WANT TO COME IN."

15 A RIGHT.

16 Q NOW, WAS THERE ANYTHING ELSE THAT WAS SAID, DO
17 YOU RECALL?

18 A NO. THAT'S ALL I REMEMBER THAT THEY SAID
19 BECAUSE IN A FEW MINUTES, THAT TIME THEY ACTUALLY MOVED OVER
20 TO THIS AREA. DOUG DOESN'T REMEMBER IT BECAUSE HE WAS JUST
21 ACTUALLY THERE TO MEET THE REPORTER, BUT THEY ACTUALLY MOVED
22 INTO THIS AREA HERE (POINTING).

23 Q DID YOU TALK ABOUT THIS WITH DOUG?

24 A YEAH, WE DID. MATTER OF FACT, YEAH, HE EVEN
25 KNEW OR HE I TOLD HIM I THOUGHT THEY MOVED OVER IN THIS
26 AREA, THAT THE VISITORS CAME TO THAT AREA AND THEY MOVED
27 OVER HERE (POINTING).

28 Q CAN YOU DESCRIBE TO ME THE PEOPLE WHO WERE WITH

1 MR. MULL? I DON'T MEAN THEIR PHYSICAL DESCRIPTION.
2 SOMETHING AS SIMPLE AS WERE THEY LADIES OR WERE THEY MEN?

3 A YEAH. IT WAS TWO LADIES. I BELIEVE IT WAS
4 LINDA MULL AND MARILYN MALEK. AND I BELIEVE THERE IS A
5 REPORTER THERE. I DON'T REMEMBER HIS NAME. I THINK IT IS
6 CRAIG SOMETHING FROM SOME OTHER NEWSPAPER.

7 Q SO THAT IS LINDA, AND MRS. MALEK AND THE GUY
8 FROM THE NEWSPAPER?

9 A YEAH.

10 Q WAS THERE ANYBODY ELSE?

11 A I BELIEVE HER HUSBAND WAS THERE, TOO. I DON'T
12 KNOW HIS NAME.

13 Q AND THAT IS ALL THAT WAS WITH MR. MULL?

14 A YES, AS I RECALL.

15 Q THANK YOU VERY MUCH. KEN REMINDED ME BEFORE.
16 I AM THROUGH WITH THAT CHART. SO IF YOU WANT TO SIT DOWN, I
17 HAVE A FEW MORE QUESTIONS.

18 SINCE YOU'VE BEEN AFFILIATED WITH THE CHURCH,
19 HOW LONG HAVE YOU BEEN IN SECURITY?

20 A YOU KNOW, SECURITY MEANS A LOT OF DIFFERENT
21 THINGS. SECURITY NATIONAL BANK, SECURITY HOMES, WHAT DO YOU
22 MEAN BY "SECURITY"?

23 Q WELL, I KIND OF FIGURED IF YOU WERE THERE
24 GUARDING THE FRONT OF THE PROPERTY, YOU WERE THERE TO SECURE
25 THE PROPERTY. -

26 A SECURE THE PROPERTY? I AM SORRY, I DON'T KNOW
27 WHAT YOU MEAN.

28 Q LET ME TRY TO HELP YOU.

1 A OKAY.

2 Q IS THERE A GROUP CONNECTED WITH THE CHURCH THAT
3 ARE PART OF SECURITY? YOU KNOW, AND SECURITY WOULD BE
4 PEOPLE THAT WOULD WALK AROUND AND MAKE SURE THAT NOTHING
5 UNTOWARD HAPPENED ON CHURCH PREMISES.

6 A A GROUP OF PEOPLE?

7 Q WELL, MAYBE YOU GOT ONE GREAT BIG GUY. I DON'T
8 KNOW. I AM ASKING YOU.

9 IS THERE ANYBODY THAT IS EITHER MEMBERS OF THE
10 CHURCH OR EMPLOYED BY THE CHURCH THAT ARE THERE TO PROTECT
11 THE CHURCH PREMISES?

12 A OH, WE HAVE GREETERS, PEOPLE -- WE HAVE NEW
13 PEOPLE COMING ON THE PROPERTY OFTEN. THEY ARE GREETERS,
14 THEY ARE HELPFUL TO PEOPLE, INFORMATION. SOME PEOPLE I
15 GUESS CALL THEM SECURITY. IT DEPENDS ON THE INDIVIDUAL, YOU
16 KNOW. EVERYBODY IS DIFFERENT, YOU KNOW.

17 SOME PEOPLE WOULD CALL THEM SECURITY JUST LIKE
18 THE GUARDHOUSE. SOME PEOPLE CALL IT A GUARDHOUSE, SOME
19 PEOPLE CALL IT A SHED, SOME PEOPLE CALL IT A PLACE JUST TO
20 VISIT OR JUST A HOUSE.

21 THE COURT: WHAT DO YOU DO ABOUT PEOPLE WHO MIGHT
22 COME ON THE PROPERTY WHO WHO ARE UNWANTED?

23 THE WITNESS: UNWANTED. CAN YOU GIVE ME AN INSTANT
24 OF UNWANTED?

25 THE COURT: SUPPOSE THAT ONE OR SEVERAL PEOPLE COME
26 ON THE PROPERTY AND THE LEADERS OF CHURCH UNIVERSAL AND
27 TRIUMPHANT DON'T WANT THOSE PEOPLE ON THE CAMELOT PROPERTY.
28 ARE THERE PEOPLE AT CAMELOT WHO DEAL WITH THIS KIND OF

1 PROBLEM?

2 THE WITNESS: WHO DEAL WITH THAT KIND OF PROBLEM? I
3 WAS THE MAN AT THE GATE WHO TOOK IN INFORMATION. OF COURSE,
4 YOU KNOW, AS YOU KNOW, THERE HAS BEEN PEOPLE WHO HAVE
5 THREATENED INDIVIDUALS IN OUR ORGANIZATION, YES, YEAH. I
6 WOULDN'T CALL THEM UNWANTED. I WOULD JUST SAY THEY ARE
7 NOT -- THEY ARE JUST NOT SUPPOSED TO BE THERE --

8 THE COURT: MAYBE I SHOULD HAVE --

9 THE WITNESS: -- BECAUSE OF THE WAY THEY ACTED.

10 THE COURT: MAYBE I SHOULD HAVE USED THE WORD
11 "UNWELCOME."

12 THE WITNESS: YES. YOU ARE TAKING THAT FROM WHEN
13 GREGORY MULL CAME ON THE PROPERTY. HE WAS UNWELCOME.

14 THE COURT: SUPPOSE THERE ARE PEOPLE WHO COME ON THE
15 PROPERTY WHO ARE UNWELCOME. ARE THERE PEOPLE AT CAMELOT WHO
16 GREET THOSE UNWELCOME PEOPLE?

17 THE WITNESS: GEE WHIZ, NOW YOU ARE GETTING TO
18 GREETING. YOUR HONOR --

19 THE COURT: OH, FORGET IT. FORGET IT.

20 THE WITNESS: YEAH, THERE ARE PEOPLE THAT GREET THEM.

21 THE COURT: FORGET IT.

22 GO AHEAD.

23 Q BY MR. LEVY: HOW TALL ARE YOU?

24 A (NO AUDIBLE RESPONSE.)

25 Q YOU SHOULD BE ABLE TO ANSWER THAT. YOU
26 SHOULDN'T HAVE TO LOOK AT KEN.

27 A HE IS A FRIEND OF MINE. CAN'T I LOOK AT HIM?
28 SIX-THREE.

1 Q I REMEMBER YOU SAID YOU DON'T CARRY A GUN. AT
2 SIX-THREE YOU PROBABLY DON'T NEED TO.

3 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT
4 IS ARGUMENTATIVE, SELF-SERVING.

5 THE COURT: SUSTAINED.

6 Q BY MR. LEVY: TO YOUR KNOWLEDGE, WAS ANYBODY
7 OUT AT CAMELOT EVER TRAINED IN ANY KIND OF SELF-DEFENSE?

8 A TO MY KNOWLEDGE, ANYBODY EVER TRAINED IN
9 SELF-DEFENSE? THERE MIGHT HAVE BEEN PEOPLE. I DON'T
10 RECALL.

11 Q DID YOU EVER WORK WITH A GENTLEMAN NAME OF
12 CHARLES BRIGHT?

13 A I NEVER WORKED WITH HIM, NO. BUT I KNOW
14 CHARLES BRIGHT.

15 Q IS HE TRAINED IN SELF-DEFENSE?

16 A I DON'T THINK SO.

17 Q ARE YOU TRAINED IN SELF-DEFENSE?

18 A JUST MY ARMY TRAINING WHEN I WAS IN THE ARMY
19 BECAUSE IT WAS DURING THE VIET NAM WAR. I WAS TRAINED FOR
20 COMBAT.

21 Q YOU SAID THAT MR. MULL, WHEN HE LEFT, HE WAS
22 FRUSTRATED. DID HE HAVE OCCASION TO TALK TO YOU THAT DAY?

23 A NO, HE DIDN'T TALK TO ME.

24 Q IF HE HAD TALKED TO YOU THAT DAY, WOULD YOU
25 HAVE CLEARED THINGS UP SO HE WOULDN'T HAD TO HAVE BEEN
26 FRUSTRATED?

27 MR. KLEIN: OBJECTION. SPECULATION, YOUR HONOR.

28 THE COURT: SUSTAINED.

1 MR. LEVY: NOTHING FURTHER, MR. GARCIA. THANK YOU
2 VERY MUCH.

3
4 REDIRECT EXAMINATION +

5 BY MR. KLEIN:

6 Q DURING THE YEARS THAT YOU WORKED IN THAT
7 GUARDHOUSE, WERE THERE -- WITHDRAW THAT.

8 WHEN MR. MULL WAS COMING, YOU CALLED MR.
9 FRANCIS; IS THAT RIGHT?

10 A YES.

11 Q WHY DID YOU DO THAT?

12 A BECAUSE I BELIEVE, AND I DON'T KNOW THE
13 INSTANCES, GREGORY MULL WAS NOT IN GOOD STANDING WITH THE
14 CHURCH AND EDWARD WANTED TO KNOW WHEN HE CAME ON THE
15 PROPERTY.

16 Q IF ANYBODY ELSE AT ANY OTHER TIME WHEN YOU
17 WORKED AT THAT GUARDHOUSE, IF OTHER PEOPLE HAD COME WHO YOU
18 HAD REASON TO THINK WERE UNWELCOME, WHAT WOULD YOU HAVE
19 DONE?

20 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. NO, I
21 AM NOT GOING TO OBJECT. EXCUSE ME.

22 THE WITNESS: WELL, I KNEW A LOT OF THOSE PEOPLE THAT
23 COME IN. EVEN IF THEY ARE NOT UNWANTED, I WILL TALK TO THEM
24 AND TELL THEM WHATEVER NEEDS TO BE SAID.

25 I GUESS I CAN WRITE A PAPER ON IT, BUT THERE IS
26 NOT MUCH YOU CAN SAY. ANYBODY WHO THREATENS YOU, I DON'T
27 THINK ANYBODY WOULD LIKE ANYBODY INVITED TO THEIR HOUSE TO
28 THREATEN THEM.

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MR. KLEIN: I HAVE NO FURTHER QUESTIONS.

THE COURT: WE WILL RESUME AT 9:15 TOMORROW MORNING.

(AT 4:09 P.M., AN ADJOURNMENT WAS TAKEN
UNTIL THURSDAY, MARCH 6, 1986, AT
9:15 A.M.)

1 LOS ANGELES, CALIFORNIA; THURSDAY, MARCH 6, 1986 *

2 9:35 A.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 THE COURT: GOOD MORNING.

7 LET'S PROCEED.

8 MR. LEVY: YOUR HONOR, BEFORE WE PROCEED, MR. KLEIN
9 AND I HAVE ENTERED INTO A STIPULATION. WE'D LIKE TO READ
10 THAT STIPULATION INTO THE RECORD AT THIS POINT.

11 THE COURT: VERY WELL.

12 MR. LEVY: THE STIPULATION IS AS FOLLOWS: ALL OF THE
13 PLANS PRESENTED AT THIS TRIAL WERE BROUGHT HERE IN RESPONSE
14 TO A SUBPOENA DUCES TECUM BY MR. MULL.

15 FURTHER, THAT THE CHURCH HAD DOMINION AND
16 CONTROL OF ALL OF GREGORY MULL'S WORK PRODUCT ON CHURCH
17 PROJECTS FROM THE TIME MR. MULL WAS ASKED TO LEAVE CHURCH
18 PREMISES IN MAY OF 1980, WITH THE EXCEPTION OF WHATEVER
19 PLANS GREGORY MULL TOOK WITH HIM WHEN HE WAS ASKED TO LEAVE
20 CAMELOT, IF ANY.

21 MR. KLEIN: SO STIPULATED.

22 THE COURT: ALL RIGHT. THANK YOU.

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LOS ANGELES, CALIFORNIA; THURSDAY, MARCH 6, 1986

9:35 A.M.

DEPARTMENT NO. 50

HON. ALFRED L. MARGOLIS, JUDGE

(APPEARANCES AS NOTED ON TITLE PAGE.)

MR. KLEIN: WE WOULD CALL DR. ROBERT MOORE, YOUR HONOR.

ROBERT L. MOORE,

CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND TESTIFIED AS FOLLOWS:

THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND. PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL YOUR NAME.

THE WITNESS: I AM ROBERT L. MOORE, M-DOUBLE O-R-E.

THE CLERK: FIRST NAME ALSO.

THE WITNESS: R-O-B-E-R-T.

THE CLERK: THANK YOU.

THE COURT: PROCEED.

MR. KLEIN: THANK YOU, YOUR HONOR.

DIRECT EXAMINATION

BY MR. KLEIN: DR. MOORE, WHAT ARE YOU A DOCTOR OF?

A I HOLD A PH.D. DEGREE.

Q IN WHAT?

A IN INTERDISCIPLINARY STUDIES IN PSYCHOLOGY AND RELIGION.

Q COULD YOU TELL US YOUR EDUCATIONAL BACKGROUND,

1 PLEASE, SIR?

2 A YES. I HOLD A BACHELOR'S DEGREE IN SOCIAL
3 SCIENCES FROM HENDRIX COLLEGE. I HOLD A MASTER'S DEGREE IN
4 THEOLOGY AND PSYCHOLOGY FROM SOUTHERN METHODIST UNIVERSITY
5 IN DALLAS, TEXAS. I HOLD A MASTER'S DEGREE IN PSYCHOLOGICAL
6 COUNSELING AND HISTORY OF RELIGIONS FROM DUKE UNIVERSITY IN
7 DURHAM, NORTH CAROLINA.

8 I HOLD A MASTER'S DEGREE IN PSYCHOLOGY AND
9 RELIGION FROM THE UNIVERSITY OF CHICAGO IN CHICAGO,
10 ILLINOIS. AND I HOLD A PH.D. DEGREE FROM THE UNIVERSITY OF
11 CHICAGO IN CHICAGO, ILLINOIS, IN PSYCHOLOGY AND RELIGION.

12 IN THE COURSE OF THAT WORK, I DID CLINICAL
13 INTERNSHIPS AT DUKE UNIVERSITY MEDICAL CENTER, RESIDENCY AT
14 THE UNIVERSITY OF CHICAGO HOSPITALS AND CLINICS. I DID
15 STUDIES FROM 1974 UNTIL 1983 AT THE ALFRED ADLER INSTITUTE
16 IN CHICAGO LEADING TO THE DIPLOMATE AT THAT INSTITUTION IN
17 1983.

18 I DON'T KNOW WHETHER THE JURY WOULD KNOW, THERE
19 ARE VARIOUS SCHOOLS OF PSYCHOANALYTIC THOUGHT. THE ALFRED
20 ADLER INSTITUTE IS AN ACCREDITED TRAINING INSTITUTE FOR ONE
21 OF THE SCHOOLS OF PSYCHOANALYTIC THOUGHT AND I RECEIVED THAT
22 DEGREE IN 1983.

23 I HAVE BEEN STUDYING SINCE 1981 AT THE C.G.
24 JUNG INSTITUTE IN CHICAGO AND CONTINUED MY POSTDOCTORAL
25 STUDIES THERE IN PSYCHOLOGY AND PSYCHOANALYSIS. AND I WILL
26 PROBABLY CONTINUE STUDYING UNTIL I RETIRE.

27 Q YOU SAID THAT YOU RECEIVED A MASTER'S DEGREE IN
28 THEOLOGY AND PSYCHOLOGY. WHAT IS THE NATURE OF THE TRAINING

1 ONE RECEIVES TO RECEIVE -- ONE RECEIVES TO GET SUCH A
2 DEGREE?

3 A WHEN I WAS A YOUNG MAN, I -- MY FIRST INTEREST
4 IN THIS WHOLE AREA WAS IN BECOMING WHAT IS KNOWN AS A
5 PASTORAL COUNSELOR. THAT IS SOMEONE WHO COUNSELS PEOPLE
6 FROM PSYCHOLOGICAL AND RELIGIOUS POINTS OF VIEW. AND THE
7 PROGRAM AT SOUTHERN METHODIST UNIVERSITY WAS ONE OF THE BEST
8 PROGRAMS IN THE COUNTRY AT THAT TIME.

9 AND SO IT WAS A PROGRAM OF EDUCATION AND
10 THEOLOGY, VARIOUS RELIGIOUS UNDERSTANDINGS OF HUMAN LIFE AND
11 WHAT WE KNOW TODAY AS SPIRITUAL DIRECTION, AND OF
12 PSYCHOLOGICAL THEORIES RELATING TO THAT. SO IT WAS A BASIC
13 ADVANCED DEGREE PREPARING ONE FOR PASTORAL COUNSELING AND
14 ORDINATION AS A MINISTER.

15 SOUTHERN METHODIST UNIVERSITY IS RELATED TO THE
16 UNITED METHODIST CHURCH WHICH I GREW UP IN. AND WHEN I WAS
17 A YOUNG MAN, WAS ORDAINED AS A MINISTER IN THE UNITED
18 METHODIST CHURCH.

19 Q YOU ALSO RECEIVED A MASTER'S DEGREE IN
20 PSYCHOLOGICAL COUNSELING IN THE HISTORY OF RELIGIONS.
21 WHAT --

22 A AT DUKE UNIVERSITY, YES.

23 Q AT DUKE. WHAT WAS THE NATURE OF THE TRAINING
24 THAT YOU RECEIVED?

25 A IT WAS ADVANCED TRAINING IN PSYCHOTHERAPEUTIC
26 SYSTEMS AND IN THE PSYCHOLOGY OF RELIGION IN PERSONALITY
27 THEORIES AND PSYCHOPATHOLOGY, AND THE MINOR STUDIES THERE
28 WERE IN WORLD RELIGIONS, WHAT WE KNOW AS THE HISTORY OF

1 RELIGIONS TODAY, STUDIES IN ISLAM, BUDDHISM, JUDAISM,
2 VARIOUS WORLD RELIGIONS.

3 Q THEN YOU RECEIVED A MASTER'S DEGREE AT THE
4 UNIVERSITY OF CHICAGO IN PSYCHOLOGY AND RELIGION?

5 A YES. I HAVE ALWAYS, SINCE A VERY YOUNG MAN,
6 BEEN INTERESTED IN THE INTERDISCIPLINARY RELATIONSHIP AND
7 CONTINUED THAT THROUGH MY STUDIES AT THE UNIVERSITY OF
8 CHICAGO.

9 THE UNIVERSITY OF CHICAGO IS THE -- THE
10 INSTITUTION THAT HAS DONE THE PIONEERING WORK IN THE
11 RELATIONSHIP BETWEEN PSYCHOLOGY AND RELIGION. AND THAT
12 PROGRAM COVERS DEVELOPMENTAL PSYCHOLOGY, PERSONALITY
13 THEORIES, THEORIES OF PATHOLOGY, THEORIES OF HUMAN SELF AND
14 SO FORTH AND SO ON.

15 AND AGAIN, I STUDIED EASTERN AND WESTERN
16 PHILOSOPHY AND RELIGION IN CONJUNCTION WITH THOSE STUDIES.
17 IT IS ONE OF THE FEW PLACES IN THE WORLD WHERE YOU CAN STUDY
18 THE INTER-RELATIONSHIP BETWEEN PSYCHOLOGY AND RELIGION.
19 SOME PEOPLE MANAGE TO CREATE PROGRAMS FOR THEMSELVES --

20 MR. LEVY: EXCUSE ME, YOUR HONOR. I HATE TO BE RUDE,
21 BUT I AM GOING TO OBJECT AT THIS TIME. IT IS BECOMING
22 SOMEWHAT OF A NARRATIVE.

23 THE COURT: IT IS. IT IS TIME FOR ANOTHER QUESTION.

24 Q BY MR. KLEIN: HOW MANY YEARS DID YOU SPEND
25 WORKING FOR THAT FIRST MASTER'S DEGREE FROM SOUTHERN
26 METHODIST UNIVERSITY IN PSYCHOLOGY?

27 A THAT WAS THREE YEARS.

28 Q HOW MANY YEARS DID YOU SPEND AT DUKE WORKING

1 FOR THAT DEGREE?

2 A THAT WAS A 12-MONTH PROGRAM.

3 Q HOW MANY YEARS DID YOU SPEND AT THE UNIVERSITY
4 OF CHICAGO GETTING A MASTER'S AND PH.D.?

5 A THAT WAS '68 TO '75.

6 Q THAT IS SEVEN YEARS?

7 A SEVEN YEARS.

8 Q WHAT IS YOUR PROFESSIONAL BACKGROUND?

9 A WELL, I HAVE BEEN A -- YOU KNOW, AS I MENTIONED
10 EARLIER -- AS A YOUNG MAN, I STARTED OUT AS A PASTORAL
11 COUNSELOR AND MINISTER AND THEN I BECAME A PROFESSOR IN
12 1973. I BECAME PROFESSOR OF PHILOSOPHY AND RELIGIOUS
13 STUDIES AT THE WESTERN ILLINOIS UNIVERSITY IN WHICH I TAUGHT
14 EASTERN AND WESTERN PHILOSOPHIES, AS WELL AS COURSES IN
15 PSYCHOLOGY AND RELIGION. I STAYED THERE FROM 1973 UNTIL
16 1977.

17 AT THE SAME TIME, FROM 1973 I HAD A PRIVATE
18 PRACTICE IN PSYCHOTHERAPY AND COUNSELING. AND I HAVE BEEN
19 IN PRIVATE PRACTICE OF PSYCHOTHERAPY AND COUNSELING OR
20 PSYCHOANALYSIS SINCE THAT TIME AS WELL AS BEING A PROFESSOR.

21 IN 1977, I WAS NAMED TO POST AS ASSISTANT
22 PROFESSOR OF PSYCHOLOGY AND RELIGION AT THE CHICAGO
23 THEOLOGICAL SEMINARY.

24 Q WHAT IS THE CHICAGO THEOLOGICAL SEMINARY?

25 A THE CHICAGO THEOLOGICAL SEMINARY IS THE -- IS A
26 GRADUATE INSTITUTION IN CHICAGO, THE OLDEST INSTITUTION OF
27 HIGHER EDUCATION IN CHICAGO, WHICH WAS A PIONEERING
28 INSTITUTION IN THE RELATIONSHIP BETWEEN PSYCHOLOGY AND

1 RELIGION.

2 Q COULD YOU CONTINUE ON WITH YOUR PROFESSION?

3 A IN '77 I WAS NAMED AS ASSISTANT PROFESSOR WITH
4 THE PUBLICATION OF MY FIRST BOOK. I WAS PROMOTED TO
5 ASSOCIATE PROFESSOR IN 1980 AND WAS PROMOTED TO FULL
6 PROFESSOR OF PSYCHOLOGY AND RELIGION IN 1982. AND I HAVE --
7 WHICH I HAVE CONTINUED SUBSEQUENTLY.

8 Q ARE YOU RECOGNIZED NATIONALLY IN THE FIELD OF
9 PSYCHOLOGY AND RELIGION?

10 A YES, I AM --

11 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
12 HONOR.

13 THE COURT: SUSTAINED.

14 THE ANSWER OF THE WITNESS IS STRICKEN. THE
15 JURY IS DIRECTED TO DISREGARD IT.

16 Q BY MR. KLEIN: CAN YOU TELL US ANY HONORS OR
17 AWARDS THAT YOU HAVE IN THE FIELD OF PSYCHOLOGY AND
18 RELIGION, PLEASE?

19 A WELL, I HAVE BEEN NAMED BY MY PROFESSIONAL
20 PEERS TO HEAD THE -- WHAT IS KNOWN AS THE PERSON, CULTURE
21 AND RELIGION GROUP OF THE AMERICAN ACADEMY OF RELIGION.

22 THE AMERICAN ACADEMY OF RELIGION IS AN
23 ORGANIZATION WHICH IS COMPOSED OF ALL OF THE PERSONS WHO ARE
24 PROFESSIONAL EXPERTS IN THE STUDY OF RELIGION FROM VARIOUS
25 DISCIPLINES IN THE UNITED STATES AND CANADA. AND I WAS
26 NAMED TO HEAD THAT GROUP, SERVE AS PART OF A STEERING
27 COMMITTEE FOR A NUMBER OF YEARS.

28 AND SUBSEQUENT TO THAT, I WAS NAMED TO CHAIR --

1 BE THE CHAIRMAN OF THE -- WHAT IS KNOWN AS THE RELIGION AND
2 SOCIAL SCIENCES SECTION OF THE AMERICAN ACADEMY OF RELIGION.
3 AND THAT SECTION IS THE SECTION WHICH HAS RESPONSIBILITY FOR
4 ALL OF THE RESEARCHING AND PROGRAMING --

5 MR. LEVY: YOUR HONOR, I AM GOING TO OBJECT AT THIS
6 POINT. WE ARE LISTING HONORS. WE ARE NOW INTO A NARRATIVE
7 ABOUT WHAT THESE DIFFERENT GROUPS DO.

8 THE COURT: SUSTAINED.

9 Q BY MR. KLEIN: IS THE AMERICAN ACADEMY OF
10 RELIGION -- TELL US ABOUT THE SECTION THAT YOU WERE CHAIRMAN
11 OF, PLEASE?

12 A IT IS THE SECTION THAT IS COMPOSED OF SCHOLARS
13 WHO STUDY RELIGION FROM THE VARIOUS SOCIAL AND BEHAVIORAL
14 SCIENCES IN THIS COUNTRY AND CANADA.

15 Q ARE THERE ANY OTHER HONORS OR AWARDS THAT YOU
16 RECEIVED IN THE FIELD OF PSYCHOLOGY AND RELIGION?

17 A I WAS AWARDED A GRANT FROM THE ASSOCIATE -- THE
18 AMERICAN ASSOCIATION OF THEOLOGICAL SCHOOLS TO STUDY
19 CULTURAL ANTHROPOLOGY AS IT RELATES TO THE STUDY OF RELIGION
20 AND PSYCHOLOGY. AND IN 1983, WAS ABLE TO SPEND A YEAR IN
21 ADVANCED STUDY IN -- AT BERKELEY UNDER THAT GRANT.

22 Q HAVE YOU WRITTEN ANY ARTICLES OR BOOKS IN THE
23 FIELD OF PSYCHOLOGY OR RELIGION THAT HAVE BEEN PUBLISHED?

24 A YES, I HAVE. MY FIRST BOOK WAS A BOOK ENTITLED
25 "JOHN WESLEY, AN AUTHORITY, A PSYCHOLOGICAL STUDY." AND IT
26 WAS A STUDY OF AN 18TH CENTURY RELIGIOUS LEADER AND
27 EVANGELIST. AND IT WAS PUBLISHED IN 1979 BY THE SCHOLARS
28 PRESS OF THE AMERICAN ACADEMY OF RELIGION.

1 Q HAVE YOU WRITTEN ANY OTHER BOOKS?

2 A YES. I CO-AUTHORED A BOOK ENTITLED "THE CULT
3 EXPERIENCE, RESPONDING TO THE NEW RELIGIOUS PLURALISM,"
4 WHICH WAS PUBLISHED BY PILGRIM PRESS IN 1982.

5 I HAVE EDITED A NUMBER OF OTHER BOOKS. ONE ON
6 ANTHROPOLOGY AND THE STUDY OF RELIGION, WHICH CAME OUT
7 RECENTLY. AND I'VE AUTHORED A NUMBER OF ARTICLES IN VARIOUS
8 PROFESSIONAL JOURNALS RELATING TO PSYCHOLOGY AND RELIGION.

9 Q ARE YOU A MEMBER OF ANY ORGANIZATIONS INVOLVING
10 PRACTICE OF PSYCHOLOGY?

11 A YES. I AM A CLINICAL MEMBER OF THE NORTH
12 AMERICAN SOCIETY OF ADLERIAN PSYCHOLOGISTS, AND I AM A
13 CLINICAL MEMBER OF THE NATIONAL ASSOCIATION FOR THE
14 ADVANCEMENT OF PSYCHOANALYSIS AND I AM BOARD CERTIFIED BY
15 THE AMERICAN BOARDS OF REGISTRATION AND CERTIFICATION TO
16 PRACTICE PSYCHOANALYTIC PSYCHOTHERAPY.

17 Q HOW DOES ONE GET BOARD CERTIFIED?

18 A YOU GET BOARD CERTIFIED BY BEING A GRADUATE OF
19 AN ACCREDITED INSTITUTE AND HAVING THE TRAINING, ANALYSIS
20 AND THE PRACTICE OF PSYCHOANALYSIS UNDER SUPERVISION FOR A
21 SUFFICIENT NUMBER OF HOURS, AND SUFFICIENT SUPPORTING
22 DOCUMENTATION OF YOUR COMPETENCE TO PRACTICE ANALYSIS.

23 Q DURING THE COURSE OF YOUR PRACTICE, HAVE YOU
24 HAD OCCASION TO COUNSEL INDIVIDUALS WHO LEFT WHAT HAVE BEEN
25 DESCRIBED AS NEW AGE OR ALTERNATIVE RELIGIONS?

26 A YES, I HAVE.

27 Q CAN YOU GIVE US APPROXIMATION OF HOW LONG YOU
28 HAVE BEEN DOING THAT?

1 A I STARTED DOING THAT PROBABLY AROUND 1973 AND
2 GRADUALLY DID A LITTLE BIT MORE OF IT AS TIME WENT ON.

3 Q ARE YOU STILL DOING IT?

4 A I DON'T DO MUCH ANYMORE.

5 Q APPROXIMATELY HOW MANY INDIVIDUALS HAVE YOU
6 COUNSELED WHO HAVE LEFT NEW AGE OR ALTERNATIVE RELIGIOUS
7 GROUPS?

8 A PEOPLE WHO WERE INVOLVED IN VARIOUS ASPECTS OF
9 THE RELIGIONS, PROBABLY AROUND A HUNDRED.

10 Q WHAT, IF ANY, KNOWLEDGE, EXPERIENCE DO YOU HAVE
11 WITH RESPECT TO NEW AGE RELIGIONS OR ALTERNATIVE RELIGIONS
12 THAT YOU GAINED THROUGH YOUR OWN INVESTIGATION?

13 A WELL, MY FIRST AWARENESS OF SO-CALLED MINORITY
14 RELIGIONS OR CULTS OR ALTERNATIVE RELIGIONS CAME WHEN I WAS
15 DOING COUNSELING IN PSYCHOTHERAPY IN MACOMB, ILLINOIS. AND
16 I WAS WORKING WITH SOME YOUNG PEOPLE WHO HAD BEEN INVOLVED
17 IN MINORITY RELIGIONS. AND SO MY FIRST INTEREST WAS NOT A
18 SCHOLARLY INTEREST IN IT AT ALL. IT WAS A THERAPEUTIC
19 INTEREST.

20 AND I WAS VERY CONCERNED ABOUT THE EFFECTS OF
21 MEMBERSHIP IN MINORITY RELIGIONS ON THE PERSONALITIES OF
22 YOUNG PEOPLE BECAUSE I WAS WORKING WITH YOUNG PEOPLE WHO
23 WERE -- HAD BEEN INVOLVED IN VARIOUS GROUPS. AND THESE
24 YOUNG PEOPLE WERE REALLY QUITE DISTURBED AND I WAS VERY
25 CONCERNED ABOUT WHAT I ASSUMED TO BE NEGATIVE EFFECTS OF
26 MEMBERSHIP IN THESE GROUPS ON THESE YOUNG PEOPLE.

27 AND SO THAT WAS MY FIRST EXPOSURE AND INTEREST
28 IN THIS.

1 Q BASED ON THAT CONCERN THAT YOU HAVE, WHAT, IF
2 ANYTHING, DID YOU DO WITH RESPECT TO INVESTIGATING NEW AGE
3 OR ALTERNATIVE RELIGIONS?

4 A WELL, THAT WAS THE BEGINNING OF MY INTEREST IN
5 RESEARCH IN THIS, INTEREST AND RESEARCH IN THIS. AS A
6 SCHOLAR, I HAVE NEVER HAD A PARTICULAR INTEREST IN STUDYING
7 THIS TYPE OF THING BEFORE THAT TIME. AND SO AT ABOUT 1974,
8 I BEGAN TO BE INTERESTED IN DOING SOME FIELD STUDIES LIKE
9 ANTHROPOLOGISTS USING ETHNOGRAPHIC FIELD METHODS OF
10 DIFFERENT GROUPS.

11 I ENVISIONED MYSELF AS DOING RESEARCH FOR A
12 BOOK IN WHICH I WOULD TRY TO WRITE A BOOK BASED ON MY
13 INTERVIEWING AND FIELD EXPERIENCES WITH THESE MINORITY
14 RELIGIOUS GROUPS, EXPRESSING CONCERN ABOUT THE EFFECTS THAT
15 THEY WOULD HAVE ON YOUNG PEOPLE.

16 AND SO I BEGAN TO DO INTERVIEWING IN VARIOUS
17 GROUPS AROUND THE COUNTRY.

18 Q DID YOU DO THIS INTERVIEWING WITH THE KNOWLEDGE
19 OF THE LEADERS OF THE DIFFERENT RELIGIOUS GROUPS THAT YOU
20 WERE IN FACT INTERVIEWING THEIR PEOPLE?

21 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
22 HONOR, AS VAGUE, AMBIGUOUS, COMPOUND AND --

23 THE COURT: SUSTAINED.

24 Q BY MR. KLEIN: TO YOUR KNOWLEDGE, DID THE
25 LEADERS OF THE GROUPS WHOM YOU WERE RESEARCHING KNOW THAT
26 YOU WERE INTERVIEWING THEIR MEMBERS?

27 A THAT VARIED IN TERMS OF DIFFERENT GROUPS. I
28 INTERVIEWED PEOPLE AND OBSERVED PEOPLE IN MINORITY RELIGIONS

1 IN VARIOUS REGIONS OF THE COUNTRY. PEOPLE IN BOSTON, PEOPLE
2 IN THE SOUTH, PEOPLE IN CHICAGO, PEOPLE IN CALIFORNIA OF
3 VARIOUS GROUPS.

4 SOME OF THEM -- SOME OF THE LEADERS I ASSUME
5 KNEW THAT I WAS THERE AND WHAT I WAS DOING. SOME OF THEM
6 DIDN'T. I MADE NO REAL ATTEMPT TO HIDE MY IDENTITY.

7 I WAS USING WHAT IS KNOWN AS DISCIPLINE
8 OBSERVATION METHODS THAT ARE ACCEPTED IN ETHNOGRAPHIC FIELD
9 RESEARCH. AND I WOULD INTRODUCE MYSELF AS WHO I WAS, AND
10 TELL THEM THAT I WAS A PSYCHOLOGIST OF RELIGION IN THIS
11 CONTEXT, AND THAT I WAS -- THAT I PRACTICED AS A
12 PSYCHOTHERAPIST AND THAT I WAS INTERESTED IN LEARNING ABOUT
13 THEM AND ABOUT THEIR EXPERIENCE IN THESE GROUPS.

14 AND SO I WAS NEVER -- I NEVER LIED TO ANYONE
15 ABOUT WHO I WAS AND WHAT I WAS DOING. BUT SOME OF THEM
16 SHOWED MORE INTEREST THAN OTHERS AND -- IN WHO I WAS AND
17 WHAT I WAS DOING. SO IT VARIED.

18 Q WHAT ARE FIELD STUDIES?

19 A IT IS JUST WHERE YOU GO OUT ON SITE WITH PEOPLE
20 AND YOU OBSERVE THEM IN THEIR HABITAT, THAT IS, WHERE THEY
21 LIVE. YOU GO TO CLASSES, YOU SIT IN ON GROUP SESSIONS, YOU
22 TALK TO INDIVIDUALS, YOU SIT DOWN, YOU EAT WITH THEM, YOU
23 MAY IN SOME CASES SPEND THE NIGHT IN SOME CENTER JUST TO
24 TALK WITH THEM AND SEE WHAT THE ACTUAL CONDITIONS OF THEIR
25 EXISTENCE ARE.

26 Q NOW --

27 A IT IS THE SAME METHOD AS USED BY
28 ANTHROPOLOGISTS IN STUDYING ANY GROUP.

1 Q PRIOR TO ACTUALLY DOING THESE FIELD -- LET ME
2 WITHDRAW THAT.

3 DID THERE COME A TIME WHEN YOU BEGAN DOING
4 RESEARCH WITH RESPECT TO CHURCH UNIVERSAL AND TRIUMPHANT?

5 A YES. I FIRST GOT INTERESTED IN THIS PARTICULAR
6 GROUP --

7 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR, TO
8 EVERYTHING AFTER, "YES."

9 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

10 Q BY MR. KLEIN: WHEN DID YOU FIRST BEGIN DOING
11 RESEARCH ON CHURCH UNIVERSAL AND TRIUMPHANT?

12 A 1977.

13 Q AND PRIOR TO BEGINNING THAT RESEARCH, HAD YOU
14 MADE ANY ASSUMPTIONS AS TO WHETHER CHURCH UNIVERSAL AND
15 TRIUMPHANT USED ANY KIND OF THOUGHT REFORM OR IN ANY WAY
16 MANIPULATED AND CONTROLLED THEIR MEMBERS?

17 A MY ASSUMPTION WHEN I BEGAN MY FIELD STUDIES --

18 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THIS IS
19 NOT RESPONSIVE TO THE QUESTION.

20 THE COURT: SUSTAINED.

21 Q BY MR. KLEIN: YOU CAN GIVE A YES OR NO AND
22 THEN WE WILL ASK THE NEXT QUESTION.

23 A WOULD YOU REPEAT THE QUESTION, PLEASE?

24 THE COURT: WHAT IS THE ANSWER?

25 THE WITNESS: I ASKED HIM WOULD HE REPEAT THAT
26 QUESTION.

27 MR. KLEIN: YOUR HONOR, MAY THE STENOGRAPHER READ
28 BACK THE QUESTION, PLEASE.

1 THE COURT: ALL RIGHT.

2 (THE QUESTION WAS READ.)

3 THE WITNESS: YES, I DID HAVE ASSUMPTIONS.

4 Q BY MR. KLEIN: WHAT WERE YOUR ASSUMPTIONS?

5 A I ASSUMED THAT THEY DID.

6 Q THANK YOU. NOW, CAN YOU TELL US WHAT THE
7 INVESTIGATION AND RESEARCH WAS THAT YOU CARRIED OUT WITH
8 RESPECT TO CHURCH UNIVERSAL AND TRIUMPHANT AND ALSO TELL US
9 WHAT YEARS THIS OCCURRED?

10 MR. LEVY: I AM GOING TO HAVE ON OBJECT, YOUR HONOR.
11 IT'S NOW BECOME A COMPOUND QUESTION.

12 THE COURT: PLEASE REPHRASE IT.

13 Q BY MR. KLEIN: WHAT YEARS DID YOU DO YOUR
14 INVESTIGATION OF CHURCH UNIVERSAL AND TRIUMPHANT?

15 A MY INVESTIGATIONS RANGED FROM 1977 TO 1980.

16 Q WHAT WAS THE NATURE OF YOUR INVESTIGATIONS WITH
17 RESPECT TO CHURCH UNIVERSAL AND TRIUMPHANT?

18 A I BEGAN BY VISITING WHAT IS KNOWN AS TEACHING
19 CENTERS. AND I BEGAN BY JUST VISITING THE CENTER, GOING TO
20 SERVICES, TALKING TO MEMBERS, READING SOME OF THE
21 LITERATURE. AND I DID THAT IN -- VERY EXTENSIVELY IN THE
22 CHICAGO TEACHING CENTER. AND LATER DID A SIMILAR THING IN
23 BOSTON. AND SO A LOT OF MY WORK WAS JUST GETTING TO KNOW
24 PEOPLE WHO WERE INVOLVED WITH THE CHURCH UNIVERSAL AND
25 TRIUMPHANT IN CHICAGO.

26 Q BY MR. KLEIN: WERE YOU RESTRICTED IN ANY WAY
27 IN YOUR RESEARCH BY LEADERS OR ANYBODY ELSE CONNECTED WITH
28 CHURCH UNIVERSAL AND TRIUMPHANT?

1 A NOT TO MY KNOWLEDGE.

2 Q WERE YOU ABLE TO TALK TO WHOEVER YOU WANTED TO
3 TALK TO?

4 A YES, I WAS.

5 Q DID THE PEOPLE RESPOND TO YOUR QUESTIONS?

6 A YES. THEY SPOKE QUITE FREELY TO ME ABOUT THEIR
7 LIVES AND ABOUT THE -- THEIR RELIGIOUS HISTORIES AND THEIR
8 PERSONAL HISTORIES AND WHAT THEY FELT THEY WERE GETTING OUT
9 OF THE EXPERIENCE WITH THIS PARTICULAR GROUP.

10 Q DID YOU REACH ANY CONCLUSIONS AS TO WHETHER YOU
11 WERE GETTING PLANNED OR CANNED ANSWERS AS OPPOSED TO
12 SPONTANEOUS RESPONSES TO YOUR QUESTIONS? DID YOU REACH ANY
13 CONCLUSIONS WITH RESPECT TO THAT?

14 A YES. I SAW NO EVIDENCE THAT I WAS GETTING ANY
15 CANNED ANSWERS BECAUSE, SEE, ONE OF THE THINGS ABOUT
16 ETHNOGRAPHIC INTERVIEWING IS YOU DO -- YOU TALK TO PEOPLE
17 UNDER A NUMBER OF DIFFERENT CONDITIONS. SO THAT IT IS VERY
18 DIFFICULT FOR THAT TO BE TOTALLY CONTROLLED IN ANY WAY.

19 Q COULD YOU CONTINUE, DID YOU DO ANY FURTHER
20 RESEARCH AND INVESTIGATION WITH THE CHURCH UNIVERSAL AND
21 TRIUMPHANT OTHER THAN WHAT YOU'VE SAID?

22 A YES. IN -- IN THE SUMMER OF 1978, AFTER I HAD
23 BEEN INTERVIEWING AND GETTING TO KNOW THE PEOPLE THERE AT
24 THE CHICAGO TEACHING CENTER, THEY ASKED ME IF I WOULD BE
25 INTERESTED IN VISITING THE CHURCH HEADQUARTERS IN
26 CALIFORNIA.

27 AND I WAS INDEED INTERESTED IN THAT. AND SO I
28 WENT ALONG WITH A NUMBER OF THE PEOPLE FROM THE CHICAGO

1 TEACHING CENTER TO WHAT WAS THEN KNOWN AS SUMMIT UNIVERSITY
2 AND I GOT TO SPEND SOMETIME THERE OBSERVING THE -- WHAT WAS
3 A CONFERENCE AROUND JULY, AROUND INDEPENDENCE DAY IN 1978.

4 AND THAT HAPPENED ALSO TO BE THE TIME IN WHICH
5 THEIR NEW HEADQUARTERS CALLED CAMELOT WAS BEING INAUGURATED.
6 AND SO I WAS ABLE TO OBSERVE THE INAUGURATION OF THAT
7 FACILITY AND TO ALSO -- DURING THAT TIME, THIS PARTICULAR
8 GROUP OF PEOPLE THAT I WAS WITH WANTED TO GO BY THE HOME IN
9 LOS ANGELES.

10 Q THE ASHRAM?

11 A YES. THE ASHRAM. AND SO I WAS ABLE TO SPEND
12 SOMETIME IN THE ASHRAM OBSERVING PEOPLE IN THE ASHRAM. I
13 WAS ABLE TO OBSERVE PEOPLE INVOLVED IN VARIOUS ASPECTS OF
14 THERE RELIGIOUS PRACTICE AND TO TALK TO PEOPLE FROM ALL OVER
15 THE COUNTRY WHO HAD COME FROM VARIOUS PLACES IN THE COUNTRY
16 TO THIS CONFERENCE.

17 AND SO I FELT THAT I HAD A VERY HELPFUL
18 EXPOSURE TO PEOPLE OF DIFFERENT WALKS OF LIFE THAT WERE A
19 PART OF THIS GROUP.

20 Q HOW LONG WERE YOU IN CALIFORNIA WITH THIS
21 GROUP?

22 A THE ACTIVITIES WENT ON FOR ABOUT A WEEK.

23 Q DURING THAT TIME, DID YOU HAVE OCCASION TO
24 INTERVIEW MEMBERS OF CHURCH UNIVERSAL AND TRIUMPHANT?

25 A WELL, ONE OF THE INTERESTING THINGS WAS THAT --
26 MR. LEVY: I AM GOING TO HAVE TO OBJECT, YOUR HONOR.
27 THAT IS ANOTHER ONE THAT CALLS FOR A YES OR NO.

28 THE COURT: PLEASE ANSWER THE QUESTION, MR. MOORE.

1 THE WITNESS: OKAY.

2 Q BY MR. KLEIN: DID YOU HAVE AN OPPORTUNITY TO
3 INTERVIEW PEOPLE?

4 A I HAD MANY OPPORTUNITIES TO INTERVIEW PEOPLE,
5 YES.

6 Q WERE YOUR INTERVIEWS LIMITED JUST TO THE
7 CHICAGO GROUP WITH WHOM YOU HAD COME?

8 A I DID EXTENSIVE INTERVIEWS WITH THEM, BUT THEY
9 WERE NOT LIMITED TO THOSE.

10 Q DURING THE TIME YOU WERE IN CALIFORNIA, DID YOU
11 MEET WITH ELIZABETH CLARE PROPHET?

12 A I OBSERVED HER, BUT I DID NOT MEET HER.

13 Q TO YOUR KNOWLEDGE, DID ELIZABETH CLARE PROPHET
14 KNOW THAT YOU WERE A PSYCHOLOGIST DOING RESEARCH OF CHURCH
15 UNIVERSAL AND TRIUMPHANT WHILE YOU WERE OUT IN CALIFORNIA?

16 A IT WAS MY JUDGMENT AT THAT TIME THAT SHE DID
17 NOT.

18 Q WHAT DO YOU BASE THAT ON?

19 A I JUST SAW ABSOLUTELY NO EVIDENCE THAT SHE WAS
20 AWARE OF MY PRESENCE THERE.

21 Q DURING THE TIME THAT YOU WERE IN CALIFORNIA AT
22 THAT CONFERENCE, DID YOU JOIN IN THE ACTIVITIES WITH THE
23 GENERAL MEMBERS OR DID YOU IN SOME WAY REFRAIN FROM DOING
24 THOSE THINGS?

25 A I WAS -- I HAD ACCESS TO EVERY ASPECT OF THEIR
26 PROGRAM FROM THEIR DECREERING SESSIONS TO THEIR LECTURES, TO
27 MEALS, TO DORMITORY WHERE I SPENT THE EVENINGS WITH THE
28 PEOPLE. SO I HAD ACCESS TO ALL ASPECTS OF THE CONFERENCE

1 PROGRAM WHILE I WAS THERE.

2 Q WHILE YOU WERE THERE, DID YOU ATTEND DECREEING
3 SESSIONS?

4 A YES, I DID.

5 Q HAD YOU ATTENDED DECREEING SESSIONS IN CHICAGO
6 PRIOR TO COMING TO CALIFORNIA?

7 A YES, I HAD.

8 Q HAD YOU ATTENDED DECREEING SESSIONS IN CHICAGO
9 AFTER LEAVING CALIFORNIA?

10 A OH, YES.

11 Q HAD YOU ATTENDED DECREEING SESSIONS OF CHURCH
12 UNIVERSAL AND TRIUMPHANT MEMBERS IN ANY OTHER CITIES OTHER
13 THAN LOS ANGELES AND CHICAGO?

14 A IN BOSTON.

15 Q CAN YOU GIVE US APPROXIMATION OF HOW MANY
16 DECREEING SESSIONS YOU'VE ATTENDED OF CHURCH UNIVERSAL AND
17 TRIUMPHANT MEMBERS?

18 A I HAVE ATTENDED, IN THE ENTIRE TIME THAT I WAS
19 STUDYING, PROBABLY A HUNDRED SESSIONS.

20 Q DID YOU REACH ANY CONCLUSIONS BASED UPON YOUR
21 OBSERVATIONS OF THESE 100 DECREEING SESSIONS ABOUT THE
22 NATURE AND EFFECT OF THESE DECREEING SESSIONS ON CHURCH
23 MEMBERS?

24 A YES.

25 Q WHAT CONCLUSIONS DID YOU REACH?

26 A MY CONCLUSIONS WERE THAT IT IS A VERY POWERFUL
27 RITUAL TECHNIQUE WHICH IS USED BY THIS GROUP TO CREATE A
28 SENSE OF GROUP SOLIDARITY AND A SENSE OF ENHANCED ENERGY AND

1 COMMITMENT I THINK, YES.

2 Q DID YOU EVER GET A SENSE THAT MEMBERS OF CHURCH
3 UNIVERSAL AND TRIUMPHANT WERE UNDER SOME KIND OF THOUGHT
4 REFORM OR MIND CONTROL OR MANIPULATION DURING THE TIME THAT
5 THEY WERE DECREEING?

6 A I DID NOT.

7 Q DID YOU EVER GET A SENSE THAT MEMBERS OF CHURCH
8 UNIVERSAL AND TRIUMPHANT WERE VERY RECEPTIVE TO BEING
9 MANIPULATED OR CONTROLLED RIGHT AFTER THEY FINISHED
10 DECREEING?

11 A ON THE BASIS OF MY OBSERVATIONS, LONG DECREEING
12 SESSIONS WERE MORE DRAINING IN SOME WAYS, YOU KNOW, JUST
13 TIRING. IT IS LIKE SITTING THROUGH A LONG PRAYER MEETING.
14 AND AFTER A LONG PRAYER MEETING, YOU DON'T WANT TO LISTEN TO
15 A TWO-HOUR SERMON TOO WELL. SO MY PERSONAL SENSE WAS THAT
16 AFTER A LOT OF DECREEING, THE ATTENTION SPAN IS PROBABLY
17 LOWER.

18 SO MY GUESS WOULD BE -- WELL, BASED ON MY
19 PERSONAL OBSERVATIONS, THAT IT IS A SIMILAR THING TO YOU SEE
20 IN OTHER CHURCHES. IF MEETINGS GO ON TOO LONG, PEOPLE ARE
21 LESS RECEPTIVE, AS ANY PREACHER KNOWS WHO'S TRIED TO PREACH
22 TO A GROUP OF PEOPLE WHO HAVE BEEN INVOLVED IN LONG
23 MEETINGS.

24 Q DID YOU GET A SENSE TO MEMBERS OF CHURCH
25 UNIVERSAL -- LET ME WITHDRAW THAT.

26 DURING THE COURSE OF YOUR PRACTICE, HAVE YOU
27 EVER DEALT WITH PEOPLE WHO WERE HYPNOTIZED?

28 A I DO NOT PRACTICE CLINICAL HYPNOSIS.

1 Q HAVE YOU EVER WORKED WITH ANYONE WHO HYPNOTIZED
2 PATIENTS?

3 A I WORKED WITH HYPNOTISTS, YES.

4 Q HAVE YOU BEEN INVOLVED WITH PATIENTS WHO WERE
5 HYPNOTIZED?

6 A OH, YES.

7 Q DID YOU EVER GET A SENSE THAT MEMBERS OF CHURCH
8 UNIVERSAL AND TRIUMPHANT WERE HYPNOTIZED IN ANY WAY EITHER
9 DURING OR AFTER THEIR DECREE SESSIONS?

10 A I SAW ABSOLUTELY NO EVIDENCE OF HYPNOSIS AT ANY
11 TIME THAT I OBSERVED MEMBERS OF THIS GROUP.

12 I MIGHT SAY I WOULD KNOW IF I SAW IT.

13 Q PRIOR TO ATTENDING THAT SEVEN-DAY CONFERENCE IN
14 CALIFORNIA, HAD YOU MADE ANY ASSUMPTIONS AS TO THE ADEQUACY
15 OF THE FOOD THAT CHURCH UNIVERSAL AND TRIUMPHANT WOULD SERVE
16 TO ITS MEMBERS DURING THAT CONFERENCE?

17 A YES. I ASSUMED THAT IT WOULD BE VERY
18 INADEQUATE AND VERY BAD FOOD, ACTUALLY.

19 Q DURING THE TIME YOU WERE IN CALIFORNIA FOR
20 THOSE SEVEN DAYS, DID YOU EAT THE FOOD THAT CHURCH UNIVERSAL
21 AND TRIUMPHANT SERVED TO ITS OTHER MEMBERS WHO WERE AT THE
22 CONFERENCE?

23 A YES, I DID.

24 Q WHAT, IF ANY, CONCLUSIONS DID YOU REACH ABOUT
25 THE QUALITY AND QUANTITY OF THE FOOD AFTER YOU SPENT SEVEN
26 DAYS EATING IT?

27 A WELL, IT WAS VEGETARIAN. AND I AM NOT A
28 VEGETARIAN. BUT I WAS SURPRISED AT THE QUANTITY AND THE

1 QUALITY OF THE FOOD. I ESPECIALLY REMEMBER THE LENTIL SOUP.

2 Q WERE THERE ANY OTHER OBSERVATIONS OR
3 CONCLUSIONS THAT YOU REACHED BASED ON YOUR SEVEN-DAY STAY IN
4 CALIFORNIA AT THE CHURCH UNIVERSAL AND TRIUMPHANT AND PEOPLE
5 AT THE CONFERENCE?

6 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THE
7 QUESTION IS VAGUE AND AMBIGUOUS.

8 THE COURT: SUSTAINED.

9 Q BY MR. KLEIN: NOW, AFTER THE CONFERENCE, DID
10 YOU RETURN TO CHICAGO?

11 A YES, I DID.

12 Q DID YOU CONTINUE TO HAVE ANY CONTACTS WITH
13 CHURCH UNIVERSAL AND TRIUMPHANT MEMBERS IN CHICAGO?

14 A FOR A TIME. AND, OF COURSE, DURING THAT TIME I
15 WAS ALSO STUDYING OTHER GROUPS. SO IT WAS -- I WAS NOT
16 FOCUSING SOLELY ON THIS GROUP.

17 Q YOU STUDIED OTHER RELIGIOUS GROUPS?

18 A YES.

19 Q APPROXIMATELY HOW MANY OTHER RELIGIOUS GROUPS
20 DID YOU STUDY AT THAT TIME?

21 A I STUDIED PROBABLY IN ALL ABOUT A DOZEN.

22 Q DURING THE COURSE OF YOUR TRAINING AND STUDIES,
23 HAVE YOU ALSO STUDIED WHAT WE WOULD CALL THE MAIN LINE
24 RELIGIOUS GROUPS AS OPPOSED TO THE NEW AGE ALTERNATIVE
25 GROUPS YOU WERE STUDYING AT THAT TIME?

26 A YES. I HAD TO TO BE A UNIVERSITY PROFESSOR
27 TEACHING THOSE RELIGIONS.

28 Q DURING YOUR SEVEN DAYS IN CALIFORNIA, DID YOU

1 HAVE AN OPPORTUNITY TO INTERVIEW IN-DEPTH CHURCH UNIVERSAL
2 AND TRIUMPHANT MEMBERS?

3 A YES, I DID.

4 Q APPROXIMATELY HOW MANY DID YOU INTERVIEW
5 IN-DEPTH?

6 A IN EXCESS OF 50.

7 Q BASED UPON ALL OF YOUR INVESTIGATION AND
8 RESEARCH OF THE CHURCH UNIVERSAL AND TRIUMPHANT, DID YOU
9 EVER SEE ANY EVIDENCE THAT MEMBERS OF CHURCH UNIVERSAL AND
10 TRIUMPHANT ARE IN ANY WAY BEING MANIPULATED OR CONTROLLED OR
11 THE VICTIMS OF THOUGHT REFORM THAT IS BEING USED ON THEM BY
12 THE LEADERS OF THE CHURCH?

13 A I SAW NO EVIDENCE OF COERCIVE PERSUASION OR
14 BRAINWASHING OR THOUGHT REFORM IN THE TIME THAT I STUDIED
15 THAT.

16 I MIGHT ADD I EXPECTED TO SEE SUCH.

17 Q WAS YOUR STUDY OF CHURCH UNIVERSAL AND
18 TRIUMPHANT AND THESE OTHER NEW AGE RELIGIONS FOR A PURPOSE?

19 A YES, IT WAS.

20 Q WHAT WAS THE PURPOSE?

21 A I WAS GOING TO WRITE A BOOK ON THIS TOPIC.

22 Q WHAT WAS THE GENERAL --

23 A THIS WAS BACK IN THE DAYS WHEN BOOKS ON THIS
24 TOPIC WERE FIRST COMING OUT.

25 Q WHAT WAS THE GENERAL DIRECTION, THE GENERAL
26 IDEA THAT YOU WERE EXPECTING TO WRITE ABOUT IN THAT BOOK?

27 A I EXPECTED TO WRITE ABOUT THE PATHOGENIC OR THE
28 PATHOLOGICAL EFFECTS OF MEMBERSHIP IN MINORITY RELIGIONS.

1 Q WHEN YOU SAY, "THE PATHOLOGICAL EFFECTS," WHAT
2 DO YOU MEAN BY THAT?

3 A I HAD THE ASSUMPTION THAT BEING A MEMBER OF A
4 MINORITY RELIGIOUS GROUP WOULD CAUSE A PERSON TO BE
5 EMOTIONALLY DAMAGED BY THEIR VERY MEMBERSHIP IN THEM.

6 Q DID YOU WRITE THAT BOOK?

7 A NO, I DID NOT.

8 Q WHY DIDN'T YOU WRITE IT?

9 A WELL, THE EVIDENCE THAT I GAINED THROUGH MY
10 ETHNOGRAPHIC FIELD STUDIES SIMPLY DID NOT SUPPORT THE
11 PROJECT I HAD ENVISIONED FOR THE BOOK.

12 Q DO YOU HAVE ANY NOTES OF YOUR INTERVIEWS WITH
13 CHURCH UNIVERSAL MEMBERS AS WELL AS MEMBERS OF OTHER
14 RELIGIONS?

15 A I DO NOT.

16 Q WHAT HAPPENED TO THOSE NOTES -- WITHDRAWN.
17 DID YOU EVER HAVE ANY NOTES?

18 A YES, I DID.

19 Q WHAT HAPPENED TO THEM?

20 A WELL, WHEN I GAVE UP ON MY BOOK PROJECT, I
21 DESTROYED THEM. MANY OF THEM WERE NOTES OF CONFIDENTIAL
22 CONVERSATIONS WITH PEOPLE RELATING THEIR PERSONAL HISTORIES.
23 I ALWAYS DESTROY THINGS ABOUT PEOPLE WHEN I HAVE NO FURTHER
24 PROFESSIONAL USE FOR THEM.

25 Q IF MEMBERS OF CHURCH UNIVERSAL AND TRIUMPHANT
26 WERE VICTIMS OF A THOUGHT REFORM PROGRAM, WOULD YOU EXPECT
27 THAT WHEN YOU INTERVIEWED A GROUP OF THEM, YOU WOULD SEE A
28 HIGHER OCCURRENCE OF PSYCHOPATHOLOGY, ABNORMAL BEHAVIOR,

1 MENTAL DISTURBANCES IN THAT GROUP THAN YOU WOULD IN A
2 COMPARABLE GROUP OF THE GENERAL POPULATION?

3 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
4 HONOR. THERE IS NO EVIDENCE AT THIS POINT THAT THIS
5 GENTLEMAN HAS BEEN QUALIFIED AS AN EXPERT IN THOUGHT REFORM.

6 THE COURT: SUSTAINED.

7 Q BY MR. KLEIN: DURING THE COURSE OF YOUR
8 STUDIES, HAVE YOU DONE RESEARCH AND INVESTIGATION AND --
9 INTO THOUGHT REFORM?

10 A I HAVE READ THE LITERATURE ON THAT. I AM NOT A
11 SPECIALIST IN THOUGHT REFORM. I HAVE NEVER STUDIED KOREAN
12 WAR VETERANS OR PRISONERS OF WAR OR OTHER PEOPLE WHO WERE
13 UNDER THAT SORT OF LIFE THREATENING PHYSICAL VIOLENCE, THE
14 THREAT OF PHYSICAL VIOLENCE. BUT I HAVE READ THE LITERATURE
15 FROM ROBERT J. LIFTON'S THOUGHT REFORM AND THE PSYCHOLOGY OF
16 TOTALISM.

17 Q AND YOU HAVE DONE COUNSELING WITH PEOPLE WHO
18 HAVE BEEN IN DIFFERENT MINORITY AND ALTERNATIVE RELIGIONS?

19 A YES, I HAVE. AND I BECAME VERY INTERESTED IN
20 THIS TOPIC AFTER NOTING THE WAY IN WHICH THE LITERATURE
21 RELATING TO KOREAN WAR VETERANS AND THE VICTIMS OF CHINESE
22 THOUGHT REFORM AND BRAINWASHING TECHNIQUES WERE BEING
23 APPLIED TO MINORITY RELIGIOUS GROUPS.

24 SO ANYONE WHO SEEKS TO UNDERSTAND THE
25 PSYCHOLOGY OF MINORITY RELIGIONS HAS TO KNOW ABOUT THIS
26 LITERATURE BECAUSE SO MUCH OF THE STUFF THAT IS SAID ABOUT
27 MINORITY RELIGIONS IS BASED ON THE KOREAN WAR EXPERIENCE OF
28 PRISONERS OF WAR.

1 Q AS A PSYCHOLOGIST -- LEAVING ALONE FOR THE
2 MOMENT KOREAN PRISONERS OF WAR -- AS A PSYCHOLOGIST, DURING
3 YOUR TRAINING, DID YOU RECEIVE TRAINING IN INFLUENCING AND
4 MANIPULATING BEHAVIOR OF INDIVIDUALS?

5 A ANYBODY WHO STUDIES LEARNING THEORY AND
6 DEVELOPMENTAL PSYCHOLOGY IN THE COURSE OF GRADUATE STUDIES
7 IN PSYCHOLOGY LEARNS ABOUT THE BASIC THEORIES OF LEARNING.
8 YOU CAN'T REALLY DO GRADUATE STUDIES IN THIS FIELD WITHOUT
9 STUDYING THAT.

10 Q IF MEMBERS OF CHURCH UNIVERSAL AND TRIUMPHANT
11 HAD BEEN MANIPULATED OR CONTROLLED BY THEIR LEADERSHIP,
12 WOULD YOU EXPECT TO SEE A HIGHER INCIDENCE OF ABNORMAL
13 BEHAVIOR IN A GROUP OF THEIR MEMBERS THAN YOU WOULD IN A
14 COMPARABLE GROUP OF THE GENERAL POPULATION?

15 A I WOULD.

16 Q DURING THE COURSE OF YOUR RESEARCH AND
17 INVESTIGATION, DID YOU?

18 A I -- ONE OF THE THINGS THAT I WAS INTERESTED
19 IN --

20 MR. LEVY: EXCUSE ME, YOUR HONOR. I AM GOING TO HAVE
21 TO OBJECT. IT CALLS FOR A YES OR NO ANSWER.

22 THE WITNESS: WOULD YOU REPEAT --

23 THE COURT: DO YOU WANT THE QUESTION REREAD?

24 THE WITNESS: YES, PLEASE.

25 THE COURT: ALL RIGHT. IF YOU PLEASE.

26 (THE REPORTER READ THE RECORD AS FOLLOWS:

27 "Q IF MEMBERS OF CHURCH
28 UNIVERSAL AND TRIUMPHANT HAD BEEN

1 MANIPULATED OR CONTROLLED BY THEIR
2 LEADERSHIP, WOULD YOU EXPECT TO SEE A
3 HIGHER INCIDENCE OF ABNORMAL BEHAVIOR IN
4 A GROUP OF THEIR MEMBERS THAN YOU WOULD
5 IN A COMPARABLE GROUP OF THE GENERAL
6 POPULATION?

7 "A I WOULD.

8 "Q DURING THE COURSE OF YOUR
9 RESEARCH AND INVESTIGATION, DID YOU?"

10 THE WITNESS: NO.

11 Q BY MR. KLEIN: BASED UPON YOUR OWN EXPERIENCE,
12 IS IT VALID TO -- FOR A COUNSELOR TO REACH CONCLUSIONS ON
13 WHETHER CHURCH MEMBERS ARE MANIPULATED OR CONTROLLED BASED
14 SOLELY ON OFFICE CONSULTATIONS?

15 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION. IT
16 CALLS FOR A CONCLUSION AS TO WHAT THOSE OFFICE CONSULTATIONS
17 WOULD INCLUDE, HOW LONG THEY WOULD GO ON --

18 THE COURT: SUSTAINED.

19 Q BY MR. KLEIN: BASED ON YOUR EXPERIENCE, IS IT
20 VALID FOR A COUNSELOR TO REACH CONCLUSIONS AS TO WHETHER
21 MANIPULATION AND CONTROL IS OCCURRING WITH RESPECT TO CHURCH
22 MEMBERS BASED UPON OFFICE CONSULTATIONS WHERE HE GETS TO
23 TALK TO THE PARTICULAR VICTIM, THE PERSON WHO IS SAYING THAT
24 HE WAS CONTROLLED OR MANIPULATED, AND BASED ON OTHER OFFICE
25 CONSULTATIONS WITH OTHER MEMBERS OF THE GROUP, BUT NOT GOING
26 OUT OF THE OFFICE?

27 MR. LEVY: I AM GOING TO HAVE TO OBJECT TO THAT ONE
28 AS COMPOUND, COMPLEX, CONFUSING, AMBIGUOUS AND --

1 THE COURT: SUSTAINED. IT WAS TOO LONG ALSO.

2 MR. LEVY: IT WAS THAT TOO, ALSO.

3 Q BY MR. KLEIN: YOU DID EXTENSIVE OFFICE
4 CONSULTATIONS OF INDIVIDUALS FROM NEW AGE OR ALTERNATIVE
5 RELIGIOUS GROUPS?

6 A YES.

7 Q AND THEN YOU DID FIELD RESEARCH WHERE YOU WENT
8 OUT TO THE SITES AND MET THE PEOPLE THERE; IS THAT RIGHT?

9 A YES.

10 Q IN YOUR OWN EXPERIENCE, IN REACHING CONCLUSIONS
11 ABOUT WHETHER CHURCH MEMBERS WERE BEING MANIPULATED OR
12 CONTROLLED BY THEIR LEADERS, WERE -- WAS THE INFORMATION YOU
13 HAD RECEIVED AS A RESULT OF YOUR OFFICE CONSULTATIONS?

14 MR. LEVY: I WON'T EVEN BOTHER TO OBJECT TO THAT. I
15 AM KIND OF CURIOUS AT THIS POINT.

16 THE WITNESS: BASED ON MY -- THE ENTIRETY OF MY
17 RESEARCH, I DECIDED THAT THAT CONSTITUTES A SAMPLING ERROR
18 IN RESEARCH METHOD.

19 Q BY MR. KLEIN: WHAT DO YOU MEAN BY THAT?

20 A WELL, IF THE ONLY -- IF THE ONLY FAMILIARITY
21 YOU HAVE WITH A PARTICULAR RELIGIOUS GROUP COMES FROM
22 SOMEBODY WHO IS IN PSYCHOTHERAPY FOR EMOTIONAL DISORDERS,
23 THEN THERE WILL BE A NATURAL SELECTION IN THE SAMPLE OF
24 PEOPLE WHO ARE -- HAVE EMOTIONAL DISORDERS.

25 IF YOU DID -- IF YOU TOOK A SAMPLE OF EVERYBODY
26 IN PSYCHIATRIST OFFICES AND BASED YOUR JUDGMENT OF
27 PSYCHIATRY ON THAT, YOU WOULD HAVE TO DECIDE THAT EVERYBODY
28 THAT VISITS A PSYCHIATRIST IS EMOTIONALLY DAMAGED.

1 SO I DECIDED IT WAS A SAMPLING ERROR AND THAT
2 ANYONE WHO MAKES GROSS GENERALIZATIONS ABOUT EXPERIENCE IN
3 RELIGIOUS GROUPS OF ANY KIND BASED ON CONVERSATIONS WITH
4 PEOPLE IN PSYCHOTHERAPY HAVE A BIASED SAMPLE AT THE
5 BEGINNING.

6 I THINK ANY RESEARCHER, ANY SOCIAL BEHAVIOR
7 RESEARCHER WOULD HAVE TO ADMIT THAT.

8 Q DID THERE COME A TIME WHEN YOU READ A NUMBER OF
9 DOCUMENTS PERTAINING TO THIS PARTICULAR CASE?

10 A EXCUSE ME?

11 Q DID THERE COME A TIME WHEN YOU BEGAN READING
12 DOCUMENTS PERTAINING TO THIS PARTICULAR COURT CASE?

13 A YES.

14 Q CAN YOU TELL US WHAT DOCUMENTS YOU'VE READ
15 PERTAINING TO THIS CASE?

16 A YES. LET ME JUST READ A LIST OF THE ONES THAT
17 I HAVE READ.

18 I READ MR. MULL'S DEPOSITION IN SIX VOLUMES. I
19 READ ONE VOLUME OF RANDALL KING'S DEPOSITION. I TALKED WITH
20 MR. FRANCIS FOR APPROXIMATELY FIVE HOURS. I READ MR. MULL'S
21 TESTIMONY.

22 Q AT THIS TRIAL?

23 A YES. AND I READ MR. RANDALL KING'S TESTIMONY.

24 Q AT THIS TRIAL?

25 A YES. AND I READ DR. MARGARET SINGER'S
26 TESTIMONY AT THIS TRIAL. AND I READ A TRANSCRIPT OF A JUNE
27 THE 6TH, 1980, MEETING. AND I READ COPIES OF LETTERS BY MR.
28 MULL TO VARIOUS CHURCH OFFICIALS THAT HAVE BEEN PLACED IN

1 EVIDENCE IN THIS TRIAL. AND THAT IS THE MATERIAL THAT I
2 READ.

3 Q NOW, WE'VE HEARD TESTIMONY, AS YOU KNOW -- YOU
4 HAVE READ DR. SINGER'S TESTIMONY?

5 A YES.

6 Q WE HAVE HEARD TESTIMONY FROM HER THAT THERE ARE
7 SIX CONDITIONS PRESENT IN ORDER TO CARRY OUT A THOUGHT
8 REFORM PROGRAM AND TO ENABLE LEADERS OF CHURCH/UNIVERSAL AND
9 TRIUMPHANT TO CONTROL AND MANIPULATE THEIR MEMBERS.

10 BRIEFLY, THE SIX CONDITIONS ARE NEED TO GET
11 CONTROL OVER THE PERSON'S SOCIAL AND/OR PHYSICAL
12 ENVIRONMENT, ESPECIALLY NEED TO GET CONTROL OVER THEIR TIME.

13 TWO, THE NEED TO CREATE A SENSE OF
14 POWERLESSNESS IN A PERSON.

15 NUMBER THREE, TO MANIPULATE REWARDS,
16 PUNISHMENTS AND EXPERIENCES IN WAYS TO INFLUENCE THE PEOPLE
17 TO SUPPRESS THE DISPLAY OF THEIR OLD BEHAVIORS.

18 NUMBER FOUR, MANAGEMENT WANTS TO MANIPULATE
19 REWARDS, EXPERIENCES AND PUNISHMENTS IN ORDER TO ELICIT NEW
20 BEHAVIOR.

21 NUMBER FIVE, THE PEOPLE WHO ARE THE VICTIMS ARE
22 UNAWARE THAT IT IS BEING DONE TO THEM.

23 NUMBER SIX, IT IS DONE WITHIN A CLOSED SYSTEM
24 OF LOGIC AND WITHIN A TOTALITARIAN AUTHORITY STRUCTURE.
25 THERE IS NO COMPLAINT UPWARD TO MANAGEMENT, THERE IS NO
26 MODIFICATION OF A SYSTEM. THE SYSTEM IS UNMODIFIABLE.

27 NOW, I HAVEN'T READ EVERYTHING THAT WAS SAID,
28 BUT DID YOU READ THAT TESTIMONY?

1 A YES, I DID.

2 Q DO YOU HAVE AN OPINION AS TO WHETHER THE
3 PRESENCE OF THESE SIX FACTORS, THESE SIX CHARACTERISTICS,
4 WOULD ENABLE CHURCH UNIVERSAL AND TRIUMPHANT OR ANY CHURCH
5 TO MANIPULATE OR CONTROL ITS MEMBERS?

6 MR. LEVY: AGAIN, YOUR HONOR, I AM GOING TO HAVE TO
7 OBJECT. WE HAVE NO EVIDENCE THAT THIS GENTLEMAN IS AN
8 EXPERT ON THOUGHT REFORM.

9 THE COURT: SUSTAINED.

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

11 THE COURT: YOU CAN APPROACH THE BENCH.

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

14 MR. KLEIN: YOUR HONOR, THOUGHT REFORM IS A TERM THAT
15 MRS. SINGER USED. I HAVE ASKED THIS WITNESS IF HE BELIEVES
16 THAT THOSE CHARACTERISTICS WOULD ENABLE THE LEADERS TO
17 CONTROL AND MANIPULATE --

18 THE COURT: I HAVE YOUR QUESTION IN MIND.

19 MR. KLEIN: NOW, MY POSITION IS, YOUR HONOR, THAT
20 CONTROL AND MANIPULATION, AS HE SAID --

21 THE COURT: KEEP YOUR VOICE DOWN.

22 MR. KLEIN: ANYBODY WHO HAS STUDIED THE FIELD OF
23 PSYCHOLOGY AND PSYCHOTHERAPY, WHICH HE HAS DONE AND HE HAS
24 DONE ALL THE READING IN THE AREA CERTAINLY, HAS THE
25 EXPERTISE TO DISCUSS WHETHER THESE FACTORS WOULD NEED TO
26 CONTROL AND MANIPULATE A PERSON.

27 THE COURT: A PERSON MAY HAVE A PH.D. IN PSYCHOLOGY
28 AND BE AN EXPERT IN CHILD PSYCHOLOGY OR MAY BE AN EXPERT IN

1 DRUGS AND DRUG PROBLEMS OR MAY BE AN EXPERT IN VARIOUS KINDS
2 OF PROBLEMS HAVING NOTHING TO DO WITH THIS.

3 NOW, MY MIND IS NOT CLOSED AS TO THE
4 POSSIBILITY THAT YOU MIGHT BE ABLE TO ESTABLISH HIS ABILITY
5 TO ANSWER THE PENDING QUESTION. BUT I THINK AT THIS POINT,
6 THAT'S NOT BEEN DONE.

7 MR. KLEIN: OKAY.

8 THE COURT: IF YOU WANT TO ASK HIM, MR. LEVY, SOME
9 QUESTIONS ON VOIR DIRE, YOU CAN DO THAT. OR MR. KLEIN CAN
10 ASK HIM SOME MORE QUESTIONS. THE FACT THAT HE HAS READ SOME
11 STUFF WITHOUT MORE DOESN'T MAKE HIM AN EXPERT IN THIS FIELD.

12 MR. LEVY: I HAVE READ SOME SEX MANUALS AND I HAVE
13 BEEN TOLD I AM NOT VERY PROFICIENT. SO I THINK THIS READING
14 IS NOT EVIDENCE OF ANYTHING.

15 MR. KLEIN: AS LONG AS WE UNDERSTAND THAT THOUGHT
16 REFORM IS NOT NECESSARILY WHAT WE ARE TALKING ABOUT. WE ARE
17 TALKING ABOUT CONTROL AND MANIPULATION. AND I WILL ASK SOME
18 MORE QUESTIONS.

19 THE COURT: OKAY. LET'S PROCEED.

20 (THE PROCEEDINGS WERE RESUMED IN OPEN
21 COURT IN THE PRESENCE OF THE JURY.)

22 THE COURT: PLEASE PROCEED.

23 Q BY MR. KLEIN: DOCTOR, CAN YOU TELL US THE
24 EXTENT OF YOUR TRAINING AS WELL AS YOUR EXPERIENCE IN THE
25 AREA OF MANIPULATION AND CONTROL OF INDIVIDUALS BY OTHER
26 INDIVIDUALS?

27 A WELL, I WAS NEVER TRAINED. THE WAY THAT WAS
28 PHRASED, I WAS NEVER TRAINED TO DO THAT.

1 I HAVE STUDIES OF VARIOUS MODES OF INFLUENCING
2 BEHAVIOR, DEVELOPMENTAL THEORY AND LEARNING THEORIES. I
3 STUDIED THAT AT THE DOCTORAL LEVEL. I HAVE ALSO IN THE
4 COURSE OF WRITING THE BOOK "THE CULT EXPERIENCE" HAD TO GO
5 THROUGH THE LITERATURE ON SO-CALLED BRAINWASHING, THOUGHT
6 CONTROL, THOUGHT REFORM.

7 AND I DON'T KNOW IF THAT BOOK HAS BEEN ENTERED
8 IN EVIDENCE, BUT THERE IS A CHAPTER IN MY BOOK THAT DEALS
9 WITH THIS TOPIC SPECIFICALLY. AND SO THERE WAS A GOOD DEAL
10 OF RESEARCH THAT WENT INTO THE PREPARATION FOR THE WRITING
11 OF THAT PARTICULAR CHAPTER IN MY BOOK.

12 Q AS FAR AS INFLUENCING BEHAVIOR, HAVE YOU --
13 ALTHOUGH YOU DIDN'T NECESSARILY RECEIVE TRAINING ON HOW TO
14 INFLUENCE SOME ONE'S BEHAVIOR, HAVE YOU RECEIVED DURING THE
15 COURSE OF YOUR MASTER'S OR YOUR DOCTORAL TRAINING, HAVE YOU
16 STUDIED OR -- STUDIED THEORIES IN INFLUENCING BEHAVIOR?

17 A OF COURSE.

18 Q COULD YOU ELABORATE ON IT?

19 A SURE. THE POINT IS THAT NO PSYCHOLOGIST OR
20 PSYCHOANALYST IS TRAINED IN MANIPULATING PEOPLE OR THAT SORT
21 OF THING OR THOUGHT CONTROL. NO ONE IS TRAINED IN THAT AS A
22 COURSE OF THEIR GRADUATE PSYCHOLOGY PROGRAM. IT WOULD BE
23 UNETHICAL. IT WOULD GO AGAINST THE A.P.A.'S CODE OF ETHICS.

24 WHAT YOU ARE TRAINED IN IS UNDERSTANDING
25 BEHAVIOR AND LEARNING HOW BEHAVIOR IS LEARNED AND HOW
26 PEOPLE, IF YOU ARE A BEHAVIORIST, HOW PEOPLE ARE CONDITIONED
27 INTO VARIOUS TYPES OF BEHAVIOR. THAT IS HOW THEY ARE
28 INFLUENCED. IT IS PART OF SOCIAL PSYCHOLOGY. AND IF YOU

1 STUDY SOCIAL PSYCHOLOGY, YOU STUDY THAT TYPE OF THEORY.

2 I MIGHT ADD BEHAVIORISM IS ONLY ONE THEORY
3 AMONG MANY. AND THE THEORY THAT PEOPLE CAN BE EASILY
4 CONDITIONED BY THESE TYPES OF METHODS IS ONE THEORY OF
5 LEARNING WHICH IS NOT BY ANY MEANS ACCEPTED BY ALL
6 PSYCHOLOGISTS.

7 YOU HAVE GOT TO UNDERSTAND HOW THEORY LADEN THE
8 POSITION THAT HAS BEEN PRESENTED TO THIS COURT ON SO-CALLED
9 THOUGHT REFORM AND COERCIVE PERSUASION IS.

10 AND I NEED IN MY TESTIMONY IN ORDER TO ASSIST
11 THE JURY IN HELPING THEM UNDERSTAND HOW SUBTLE THIS QUESTION
12 OF THE MANIPULATION OF BEHAVIOR AND CONTROL OF BEHAVIOR IS,
13 PARTICULARLY WHEN YOU ARE TALKING ABOUT RELIGION.

14 Q LET ME JUST ASK YOU THIS: DID YOU TAKE COURSES
15 AND TRAINING IN LEARNING THEORY?

16 A YES, I DID.

17 Q TELL US ABOUT THAT.

18 MR. LEVY: I AM GOING TO OBJECT TO THAT, "TELL US
19 ABOUT IT." IT IS A LITTLE BIT VAGUE.

20 THE COURT: SUSTAINED.

21 Q BY MR. KLEIN: TELL US ABOUT THE COURSES AND
22 THE EXTENT OF STUDYING AND LEARNING YOU DID IN LEARNING
23 THEORY.

24 A WELL, I HAD A NUMBER OF GRADUATE COURSES, AS
25 ANYONE IN A DOCTORAL PROGRAM IN HIS FIELD HAS, IN LEARNING
26 THEORIES. YOU STUDY BEHAVIORISM, YOU STUDY USUALLY THE
27 TEXTS THAT ARE USED. IT IS JUST STANDARD EDUCATIONAL. IT'S
28 BEEN A LONG TIME SINCE — I DON'T THINK I CAN REMEMBER THE

1 COURSE SYLLABI.

2 Q AND DID YOU ALSO RECEIVE TRAINING IN
3 UNDERSTANDING THE BEHAVIOR OF INDIVIDUALS?

4 A OF COURSE.

5 Q WHAT KIND OF TRAINING DID YOU RECEIVE IN THAT?

6 A WELL, I HAVE RECEIVED EXTENSIVE TRAINING IN
7 COURSE WORK IN PERSONALITY THEORY, IN PSYCHOPATHOLOGY, IN
8 DEVELOPMENTAL PSYCHOLOGY, IN RELATIONSHIP BETWEEN CHILDHOOD
9 DEVELOPMENT AND ADULT DEVELOPMENT, DEVELOPMENT THROUGH THE
10 LIFE CYCLE. I HAVE RECEIVED TRAINING IN VARIOUS THEORIES OF
11 COGNITIVE BEHAVIOR, SOCIAL PSYCHOLOGY, STANDARD COURSE WORK.

12 Q IN ADDITION, YOU SAID THAT YOU'VE COUNSELED
13 INDIVIDUALS?

14 A EXTENSIVELY, YES.

15 Q AND TO THE -- DURING YOUR COUNSELING OF
16 INDIVIDUALS, DID YOU DISCUSS WITH THEM THEIR -- THE
17 INFLUENCES -- LET ME WITHDRAW THAT.

18 DURING YOUR COUNSELING OF THESE INDIVIDUALS,
19 DID YOU DISCUSS WITH THEM THEIR BEHAVIOR WHEN THEY WERE
20 MEMBERS OF THESE DIFFERENT ALTERNATIVE RELIGIOUS GROUPS?

21 A SURELY.

22 Q DID YOU DISCUSS WITH THEM THE THINGS THAT THEY
23 WERE TOLD BY THE LEADERS OF THESE GROUPS?

24 A UH-HUH.

25 Q AS PART OF YOUR COUNSELING, DID YOU HAVE TO
26 REACH ANY CONCLUSIONS AS TO WHETHER THEY WERE INFLUENCED OR
27 MANIPULATED OR CONTROLLED BY THESE RELIGIOUS GROUPS?

28 A YES, I REACHED CONCLUSIONS.

1 MAY I ELABORATE ON THAT?

2 Q SURE. YES.

3 A WHEN YOU ARE STUDYING PARTICIPATION IN ANY
4 RELIGIOUS GROUP, ONE OF THE IMPORTANT THINGS IS YOU HAVE TO
5 UNDERSTAND THAT EVERY RELIGIOUS GROUP IS INTERESTED IN
6 INFLUENCING THE BEHAVIOR OF ITS MEMBERS. THAT'S PART OF
7 WHAT ALL RELIGIONS DO.

8 IN OTHER WORDS, WHAT SOME WOULD CALL THOUGHT
9 REFORM, OTHER PEOPLE CALL CHRISTIAN EDUCATION. OTHER PEOPLE
10 CALL A SYNAGOGUE EDUCATIONAL PROGRAM LEARNING HOW TO LIVE
11 THE JEWISH LIFE.

12 THERE IS NO SUCH THING AS A RELIGION, A
13 RELIGIOUS GROUP OF ANY KIND -- WHETHER IT IS METHODIST OR
14 BAPTIST OR CATHOLIC OR JEWISH OR ISLAMIC -- THAT DOES NOT
15 HAVE AN INVESTMENT IN INFLUENCING THE IDEAS, THE BEHAVIORS,
16 THE ATTITUDES, THE VALUES OF ITS MEMBERS. THAT IS PART OF
17 EVERY RELIGION.

18 AND SO WHEN I GET ASKED DOES A PARTICULAR GROUP
19 HAVE AN INVESTMENT IN CONTROLLING THE BEHAVIOR AND VALUES
20 AND THINKING OF ITS MEMBERS, THEY ALL DO.

21 Q NOW, IN YOUR STUDIES --

22 THE COURT: I HAVE GOT TO ASK YOU A QUESTION. MAYBE
23 THIS WILL HELP.

24 THE WITNESS: YES, SIR.

25 THE COURT: HOW DO YOU DEFINE "COERCIVE PERSUASION"?

26 THE WITNESS: COERCIVE PERSUASION, IN MY
27 UNDERSTANDING OF IT, IS THE KIND OF PHENOMENON YOU SAW WITH
28 PRISONERS OF WAR IN THE KOREAN WAR IN WHICH PEOPLE ARE

1 CONFINED IN A SITUATION WHERE THEY CANNOT LEAVE VOLUNTARILY
2 AND THEY HAVE A THREAT OF PHYSICAL HARM OR VIOLENCE THAT
3 THEY ARE EXPOSED TO CONSTANTLY.

4 AND THAT IS WHEN WE GET THIS PHENOMENON THAT WE
5 KNOW IN PSYCHOANALYSIS CALLED IDENTIFICATION WITH THE
6 AGGRESSOR IN WHICH WHAT YOU DO IS YOU BEGIN -- IN ORDER TO
7 PROTECT YOUR LIFE, YOU BEGIN TO TAKE ON THE THINKING AND THE
8 CHARACTERISTICS OF THE PEOPLE THAT HAVE THE GUNS OR THE
9 PEOPLE THAT HAVE THE POWER OF LIFE AND DEATH OVER YOU.

10 THAT IS WHAT I UNDERSTAND COERCIVE PERSUASION
11 TO BE. IT IS BASED IN THAT TYPE OF PHYSICAL THREAT.

12 THE COURT: CAN IT BE, ACCORDING TO YOUR
13 UNDERSTANDING, COERCIVE PERSUASION WITHOUT ABSOLUTE PHYSICAL
14 CONFINEMENT?

15 THE WITNESS: I HAVE NOT SEEN ANY EVIDENCE OF THAT,
16 NO. AND I THINK THAT ALL OF THESE PEOPLE THAT TESTIFY ABOUT
17 THAT SORT OF THING ARE REALLY MISLEADING A LOT OF PEOPLE.

18 THE COURT: SO IN YOUR VIEW, THERE HAS TO BE ABSOLUTE
19 PHYSICAL CONFINEMENT?

20 THE WITNESS: AND THREAT OF WHERE A PERSON
21 LEGITIMATELY FEELS THAT THEY HAVE A LEGITIMATE UNDERSTANDING
22 OF THREAT TO THEIR LIFE, THAT THEY CANNOT GET UP AND LEAVE.

23 IF THEY CAN GET UP AND LEAVE, THAT DOES NOT
24 EXIST. IF THEY CAN GET UP BODILY AND LEAVE A GROUP, IF THEY
25 CAN GO A.W.O.L., THEN THAT COERCIVE PERSUASION SIMPLY DOES
26 NOT EXIST.

27 THE COURT: IN YOUR VIEW, IS IT POSSIBLE THAT THE
28 PRESSURES BROUGHT UPON PEOPLE NOT TO LEAVE ARE SO GREAT THAT

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1 IN REALITY THERE IS COERCIVE PERSUASION, ALTHOUGH THERE ARE
2 NO PHYSICAL BARRIERS TO PREVENT DEPARTURE?

3 THE WITNESS: NO. I DID BELIEVE THAT. BUT BASED ON
4 MY OBSERVATIONS OF GROUP MEMBERS AND VARIOUS GROUPS, I HAVE
5 NOT SEEN ANY EVIDENCE THAT, UNDER THE CONDITIONS THAT WE ARE
6 TALKING ABOUT HERE, THAT THE PERSON IS -- HAS LOST THAT
7 AUTONOMY.

8 WHEN A PERSON DECIDES THEY ARE FED UP, THEY
9 LEAVE. WHEN A PERSON GETS TIRED, DISILLUSIONED, FED UP,
10 THEY GET UP AND LEAVE. JUST LIKE WHEN A PERSON GETS TIRED
11 AND FED UP IN A MARRIAGE, THEY LEAVE. WHEN THEY GET TIRED
12 AND FED UP ABOUT BEING IN THE MILITARY, WHAT DO THEY DO?
13 THEY GO A.W.O.L.

14 I THINK THERE IS MUCH TOO MUCH PRESSING OF THIS
15 VISION OF HUMAN BEINGS AS ROBOTS. HUMAN BEINGS DO NOT
16 FUNCTION --

17 MR. LEVY: EXCUSE ME, YOUR HONOR. I HATE TO
18 INTERRUPT.

19 THE COURT: I THINK IT IS TIME FOR ANOTHER.

20 MR. LEVY: MAY I TAKE THIS WITNESS ON VOIR DIRE?

21 THE COURT: YOU CAN IN ONE MINUTE. YOU CAN IN ONE
22 MINUTE. I AM ALMOST DONE.

23 NOW, IF I RECALL ACCURATELY --

24 THE WITNESS: YES.

25 THE COURT: -- YOU SPENT SOME TIME TAKING A PRETTY
26 CLOSE LOOK AT ABOUT A DOZEN --

27 THE WITNESS: YES.

28 THE COURT: -- NEWER RELIGIONS?

1 THE WITNESS: YES. SMALL RELIGIONS.

2 THE COURT: SMALL RELIGIONS.

3 THE WITNESS: SOME OF THEM ARE NOT NEW, BUT THEY ARE
4 ALL SMALL IN AMERICAN CONTEXT.

5 THE COURT: APPROXIMATELY A DOZEN?

6 THE WITNESS: YES.

7 THE COURT: OKAY. DID YOU FIND IN ANY OF THEM THAT
8 COERCIVE PERSUASION EXISTED?

9 THE WITNESS: I HAVE SEEN -- IN NONE OF MY STUDIES
10 HAVE I SEEN ANY EVIDENCE THAT THE -- THAT WHAT IS KNOWN IN
11 THIS TESTIMONY AS COERCIVE PERSUASION WAS A REALITY.

12 THE COURT: OR DID YOU FIND IN ANY OF THOSE GROUPS
13 THAT YOU TOOK A CLOSE LOOK AT ANY EVIDENCE OF A THOUGHT
14 REFORM PROJECT?

15 THE WITNESS: AS IT IS DESCRIBED IN THIS TESTIMONY, I
16 DID NOT.

17 THE COURT: MRS. -- DR. SINGER'S TESTIMONY?

18 THE WITNESS: RIGHT.

19 THE COURT: YOU ARE REFERRING TO DR. SINGER'S
20 TESTIMONY?

21 THE WITNESS: YES, I AM. AND I WOULD BE INTERESTED
22 IN ELABORATING ON DR. SINGER'S TESTIMONY FOR THE JURY IF I
23 MAY.

24 THE COURT: WELL, I WILL LEAVE THAT FOR COUNSEL.

25 THE WITNESS: IT IS VERY IMPORTANT FOR THIS JURY THAT
26 I BE ABLE TO TALK ABOUT DR. SINGER'S TESTIMONY.

27 THE COURT: JUST BEAR WITH ME FOR A MINUTE. YOU
28 FOUND THAT, AS I UNDERSTAND IT, IN NONE OF THE APPROXIMATELY

1 ONE DOZEN RELIGIONS THAT YOU TOOK A PRETTY CLOSE LOOK AT --

2 THE WITNESS: YES.

3 THE COURT: -- EVIDENCE OF THOUGHT REFORM.

4 THE WITNESS: OR BRAINWASHING OR ANY OF THOSE TERMS
5 THAT ARE USED SO POPULARLY.

6 THE COURT: APPLYING THE CRITERIA THAT DR. SINGER
7 DISCUSSED IN THIS TRIAL.

8 THE WITNESS: SEE, THAT IS --

9 THE COURT: IS THAT CORRECT?

10 THE WITNESS: I SAW NO EVIDENCE THAT THE PHENOMENON
11 WHICH SHE ALLEGES TO EXIST EXISTED IN ANY OF THESE GROUPS.

12 THE COURT: WAIT A MINUTE. WE ARE TALKING ABOUT TWO
13 DIFFERENT THINGS NOW. MY QUESTION IS THIS: APPLYING DR.
14 SINGER'S CRITERION, DID YOU FIND EVIDENCE OF THOUGHT REFORM
15 IN ANY OF THE, AS YOU CALL, SMALLER RELIGIONS THAT YOU TOOK
16 A CLOSE LOOK AT?

17 THE WITNESS: I DID NOT.

18 THE COURT: APPLYING HER CRITERION.

19 THE WITNESS: RIGHT.

20 MR. KLEIN: YOUR HONOR, MIGHT I JUST CLARIFY?

21 THE COURT: MY NEXT QUESTION IS APPLYING YOUR
22 CRITERION, WHICH REQUIRES ABSOLUTE PHYSICAL CONFINEMENT --

23 THE WITNESS: AND THREAT.

24 THE COURT: AND THREAT. YES, SIR. DID YOU FIND --
25 APPLYING YOUR CRITERION, DID YOU FIND ANY EVIDENCE OF
26 THOUGHT REFORM IN ANY OF THE APPROXIMATELY ONE DOZEN SMALLER
27 RELIGIONS THAT YOU TOOK A LOOK AT?

28 THE WITNESS: I DID NOT. AND THAT IS WHY I DID NOT

1 WRITE MY BOOK.

2 THE COURT: I AM FINISHED.

3 THE WITNESS: AND LET ME --

4 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

5 MR. LEVY: MAY I TAKE THIS WITNESS ON VOIR DIRE JUST
6 WITH REGARD TO COERCIVE PERSUASION, YOUR HONOR?

7 THE COURT: ALL RIGHT.

8 MR. KLEIN: MIGHT I FIRST JUST ASK ONE OTHER QUESTION
9 IN LINE WITH WHAT YOUR HONOR JUST SAID BEFORE COUNSEL DOES?

10 THE COURT: ALL RIGHT. ONE QUESTION AND THEN YOUR
11 TURN.

12 Q BY MR. KLEIN: WHEN YOU SAY THAT YOU DID NOT
13 FIND THOUGHT REFORM, DID YOU IN YOUR STUDIES OF THOSE 12
14 RELIGIONS AT VARIOUS TIMES FIND THE SIX FACTORS THAT DR.
15 SINGER HAS LISTED? FORGETTING ABOUT WHETHER YOU AGREE THAT
16 THAT EQUALS THOUGHT REFORM, DID YOU FIND THOSE SIX FACTORS?

17 A OH, YES. YES, I DID.

18 Q AM I CORRECT IN SAYING THAT YOU MAY HAVE FOUND
19 THE SIX FACTORS, BUT YOU DIDN'T CONCLUDE THAT THAT LED TO --

20 MR. LEVY: I AM GOING TO OBJECT AS LEADING HIS OWN
21 WITNESS.

22 THE COURT: SUSTAINED.

23 Q BY MR. KLEIN: WHEN YOU FOUND THE SIX FACTORS,
24 DID YOU EVER FIND THAT THE PRESENCE OF THOSE SIX FACTORS LED
25 TO THOUGHT REFORM OR MANIPULATION?

26 A IN MY VIEW --

27 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. WE
28 STILL HAVE NOT QUALIFIED THIS MAN AS AN EXPERT IN THE FIELD

1 OF THOUGHT REFORM.

2 THE COURT: SUSTAINED.

3 IT IS YOUR TURN TO ASK YOUR QUESTIONS.

4 MR. LEVY: THANK YOU, YOUR HONOR.

5 THE WITNESS: COULD I COMMENT ON THAT?

6 THE COURT: NO, YOU CANNOT.

7

8

VOIR DIRE EXAMINATION

9

BY MR. LEVY:

10 Q DR. MOORE.

11 A YES.

12 Q DO YOU BELIEVE THERE ARE ANY DEGREES OF
13 COERCIVE PERSUASION?

14 A CERTAINLY.

15 Q WOULD YOU ELABORATE FOR US ON WHAT YOU CONSIDER
16 TO BE THE DEGREES OF COERCIVE PERSUASION?

17 MR. KLEIN: I AM GOING TO OBJECT AS TO IMPROPER VOIR
18 DIRE, YOUR HONOR.

19 THE COURT: OVERRULED.

20 THE WITNESS: WOULD YOU REPEAT YOUR QUESTION, PLEASE.
21 IT IS A LITTLE DISTRACTING, ALL THIS --

22 Q BY MR. LEVY: I WILL TRY TO HOLD HIM DOWN.

23 YOU TOLD US THERE WERE VARYING DEGREES OF
24 COERCIVE PERSUASION. I'D LIKE TO KNOW WHAT YOU CONSIDER THE
25 VARYING DEGREES TO BE?

26 A WELL, THERE ARE DEGREES OF IT, CERTAINLY. BUT
27 THEY ARE ALL WITHIN THE PARAMETERS THAT I MENTIONED. WHEN
28 SOMEONE HAS BEEN KIDNAPPED, PHYSICALLY DETAINED, A LOT OF

1 DIFFERENT THINGS CAN HAPPEN TO THEM WHEN THEY ARE KIDNAPPED.
2 THEY CAN BE BEATEN --

3 Q EXCUSE ME, SIR. I DON'T MEAN TO INTERRUPT.
4 ARE YOU LISTING KIDNAPPING AS ONE DEGREE?

5 A I AM LISTING THE KINDS OF PHENOMENA OF COERCIVE
6 PERSUASION THAT CAN EXIST IN KIDNAPPING CASES LIKE THE PATTY
7 HEARST CASE.

8 Q OKAY. SINCE MY QUESTION WAS ASKING YOU FOR A
9 LISTING OF THE DIFFERENT DEGREES, WE CAN DISCUSS EACH
10 DIFFERENT DEGREE AFTER YOU TELL ME WHAT THE DIFFERENT
11 DEGREES ARE.

12 A THE DIFFERENT DEGREES WOULD BE THE DIFFERENT
13 DEGREES OF THREAT PERCEIVED BY THE INDIVIDUAL TO THEM IN
14 TERMS OF PHYSICAL VIOLENCE OR LOSS OF LIFE.

15 IF THEY ARE BEING THREATENED WITH TORTURE OR
16 THEY ARE BEING THREATENED WITH BEING EXECUTED OR IF THEY ARE
17 BEING THREATENED IN SOME OTHER WAY VIOLENCE TO THEIR PERSON,
18 THEIR DEGREE IS THE PHYSICAL VIOLENCE.

19 WE KNOW ABOUT WHAT HAPPENS TO PEOPLE IN PRISONS
20 AND SO FORTH IN THESE COUNTRIES WHERE THERE IS NO HUMAN
21 RIGHTS. AND SO THERE ARE VARYING DEGREES OF THE THREATS
22 MADE TO PEOPLE. BUT THEY ALL ARE UNDER THESE PARAMETERS OF
23 THE PHYSICAL THREAT.

24 IF A PERSON IS NOT -- IF A PERSON IS FREE TO
25 LEAVE, I SIMPLY DON'T BELIEVE THAT THE PHENOMENON OF
26 BRAINWASHING OR THOUGHT REFORM OR COERCIVE PERSUASION
27 EXISTS.

28 Q ARE YOU TELLING ME THAT THERE HAS TO BE A

1 PHYSICAL THREAT?

2 A YES, I AM.

3 Q NOW, HAVE YOU EVER SEEN A COURTROOM DRAMA ON
4 TELEVISION?

5 A I DON'T WATCH MUCH TELEVISION.

6 Q TAKE A LOOK ACROSS THE JUDGE'S BENCH AND I
7 THINK YOU WILL SEE A GAVEL. WOULD YOU DO ME THE KINDNESS OF
8 LOOKING OVER THERE?

9 A SURE.

10 Q HAVE YOU EVER SEEN THE JUDGE IN ANY PLACE OR
11 ANY CASE PICK UP THE GAVEL AND BANG IT DOWN ON HIS DESK?

12 A NO, I DON'T THINK I HAVE.

13 Q YOU HAVE NEVER SEEN IT, NEVER HEARD OF IT?

14 A I DON'T THINK I HAVE EVER SEEN THAT.

15 Q WHAT ODDS WOULD YOU GIVE ME IF THE JUDGE BANGED
16 THAT GAVEL DOWN RIGHT NOW, EVERYBODY IN THIS COURTROOM WOULD
17 STOP WHATEVER THEY WERE DOING AND WOULD PAY ATTENTION TO THE
18 JUDGE?

19 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
20 IMPROPER VOIR DIRE.

21 THE COURT: OVERRULED.

22 THE WITNESS: WELL, IF HE DID IT THOROUGHLY, I WOULD
23 IMAGINE HE WOULD GET THEIR ATTENTION.

24 Q BY MR. LEVY: NOW, IF HE BANGED THE GAVEL DOWN,
25 WOULD YOU FEEL A PHYSICAL THREAT?

26 A NO.

27 Q BUT YOU WOULD RESPOND AND YOU WOULD BEHAVE
28 ACCORDINGLY; IS THAT PROPER?

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1 A I WOULD RESPOND FREELY.

2 Q BUT YOU WOULD RESPOND PROPERLY TO WHAT THE
3 BANGING OF THE GAVEL IMPLIES, WOULD YOU NOT?

4 A IN TERMS OF SOCIAL BEHAVIOR, SOCIAL RULES.

5 Q ARE YOU TELLING ME THEN THAT IT DEPENDS UPON
6 WHAT IS DONE AND WHAT THE CIRCUMSTANCE IS FOR THERE TO BE
7 SOME KIND OF MANIPULATIVE CONTROL WITHOUT THE NECESSITY OF A
8 GUN POINTED AT ANYONE?

9 A I WOULDN'T BE CONTROLLED BY THE JUDGE. I WOULD
10 NOT -- I WOULD NOT CONSIDER THAT IF THIS JUDGE HITS HIS
11 GAVEL, THAT HE'S TURNED ME INTO SOMEBODY WHO HAS LOST HIS
12 AUTONOMY.

13 Q WHY IS IT THEN, SIR --

14 A I AM FREE TO BE A CITIZEN OF THESE UNITED
15 STATES. WHEN HE HITS THE GAVEL, I HAVE NOT LOST MY FREEDOM.
16 THAT IS A STRANGE LINE.

17 Q WHY IS IT THEN WHEN HE TELLS YOU TO STOP
18 TALKING, YOU STOP TALKING IN RESPONSE TO HIM EVEN WHEN HE
19 DOESN'T BANG THE GAVEL? YOU DO RESPOND TO AUTHORITY, DO YOU
20 NOT?

21 A YES, I DO.

22 Q NOW, IS IT POSSIBLE THAT SOMEONE WHO RESPONDS
23 TO AUTHORITY, THE IMPLICIT AUTHORITY THAT PERSON MIGHT HAVE,
24 IS BEING PERSUADED OR CONTROLLED OR POSSIBLY EVEN
25 MANIPULATED?

26 A WELL, THERE ARE SOME STUDIES THAT SHOW THAT
27 SOME INDIVIDUALS ARE OVERLY RESPONSIVE TO AUTHORITY, MILGRAM
28 STUDIES. BUT NORMALLY THAT IS NOT THE CASE.

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1 IF YOU BUY THAT, YOU HAVE TO TOTALLY THROW OUT
2 A VISION OF THE HUMAN BEING AS HAVING FREE WILL AND AUTONOMY
3 AND THE CAPACITY TO LIVE IN A DEMOCRATIC STATE. IF YOU HAVE
4 THAT VIEW OF HUMAN BEINGS, THAT THEY ARE THAT EASILY
5 MANIPULATED, YOU HAVE A VISION THAT WOULD FIT WITH SOVIET
6 POLITICS AND SOCIETY, NOT WITH THE UNITED STATES.

7 Q DO YOU PAY TAXES, SIR?

8 A I CERTAINLY DO.

9 Q DO YOU ANSWER ALL THE LITTLE QUESTIONS ON YOUR
10 I.R.S. FORM?

11 A UH-HUH.

12 Q DO YOU REALLY LIKE THAT? OR DO YOU COMPLY
13 BECAUSE IT IS ANTICIPATED THAT YOU WILL COMPLY? AND NOBODY
14 COMES TO YOUR HOUSE OR YOUR ACCOUNTANT'S OFFICE WITH A GUN,
15 DO THEY? YOU DO UNDER THE CIRCUMSTANCE WHAT IS EXPECTED AND
16 YOU DO IT HERE, YOU ARE NOT DOING IT IN RUSSIA, ARE YOU?

17 MR. KLEIN: I AM GOING TO OBJECT AS TO COMPOUND
18 AND --

19 THE WITNESS: I FREELY PAY MY TAXES.

20 THE COURT: SUSTAINED.

21 MR. LEVY: NOTHING FURTHER AT THIS TIME, YOUR HONOR.

22 THE WITNESS: I DON'T CONSIDER PAYING TAXES --

23 THE COURT: LET ME --

24 THE WITNESS: -- A TOTALITARIAN THING.

25 THE COURT: LET ME ASK YOU ONE QUESTION. CAN YOU
26 CITE US TO ANY AUTHORITY FOR THE PROPOSITION, BESIDES YOUR
27 OWN POINT OF VIEW, THAT COERCIVE PERSUASION IS LIMITED TO A
28 SITUATION IN WHICH THERE IS ABSOLUTE PHYSICAL CONFINEMENT

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1 PLUS A THREAT THAT YOU DISCUSSED?

2 THE WITNESS: WELL, THE MAJOR STUDIES OF THIS
3 PHENOMENON ARE STUDIES OF SITUATIONS IN WHICH THAT IS THE
4 CASE. THE WHOLE THEORY DEVELOPED OUT OF THAT. THE
5 APPLICATION TO SITUATIONS LIKE SMALL RELIGIOUS GROUPS IS A
6 TOTAL MISAPPLICATION OF THAT THEORY.

7 THE COURT: LET ME TRY MY QUESTION AGAIN. CAN YOU
8 CITE US TO ANY SPECIFIC AUTHORITY, BEYOND YOUR OWN POINT OF
9 VIEW, FOR THAT PROPOSITION?

10 THE WITNESS: WELL, READ ROBERT J. LIFTON'S THOUGHT
11 REFORM AND THE PSYCHOLOGY OF TOTALISM. HE IS TALKING ABOUT
12 THE SITUATION THERE WITH THE KOREAN PRISONERS OF WAR.

13 THE PEOPLE THAT WRITE ABOUT THIS TOPIC, LIKE
14 FOR EXAMPLE THE TESTIMONY OF DR. SINGER -- SHE IS, YOU KNOW,
15 PRESENTED TO THIS JURY AS AN EXPERT ON THIS TOPIC --

16 THE COURT: WAIT A MINUTE. LET ME TRY AGAIN. LET ME
17 TRY ONCE MORE.

18 CAN YOU DIRECT ANY OF US TO ANY AUTHORITY THAT
19 DECLARES THAT THOUGHT REFORM IS LIMITED TO A SITUATION OF
20 ABSOLUTE PHYSICAL CONFINEMENT PLUS THREAT?

21 THE WITNESS: NOW, BY --

22 THE COURT: DID SOMEBODY ELSE SAY THAT IT IS LIMITED
23 TO THAT?

24 THE WITNESS: WELL, I AM NOT FAMILIAR WITH SOMEBODY
25 THAT, YOU KNOW, LAYS THAT OUT IN JUST THAT WAY. BUT --

26 THE COURT: YOU'VE RESTRICTED IT --

27 THE WITNESS: YES, I HAVE.

28 THE COURT: -- TO THAT SITUATION?

1 THE WITNESS: YES.

2 THE COURT: CAN YOU POINT US TO ANYBODY ELSE WHO HAS
3 DECLARED THAT IT IS RESTRICTED TO AS YOU HAVE SUGGESTED IT
4 SHOULD BE?

5 THE WITNESS: WELL, THERE ARE A NUMBER OF BOOKS. ONE
6 THAT IS A BOOK BY BROMLEY AND SHUPE, WHICH IS CALLED
7 "STRANGE GODS," WHICH ANALYZES THIS WHOLE PHENOMENON AND
8 COMES TO ESSENTIALLY THE SAME CONCLUSIONS THAT I HAVE.

9 THERE IS A BOOK ENTITLED "RADICAL DEPARTURES"
10 WHICH ANALYZES THE MINORITY RELIGIOUS PHENOMENON IN THESE
11 MATERIALS AND COMES TO ESSENTIALLY THE SAME CONCLUSIONS THAT
12 I HAVE.

13 THE COURT: THAT THERE IS NO THOUGHT REFORM ABSENT
14 ABSOLUTE PHYSICAL CONFINEMENT PLUS THREAT? IS THAT -- THAT
15 IS THE CONCLUSION THAT THOSE PEOPLE COME TO?

16 THE WITNESS: THAT PEOPLE IN MINORITY RELIGIOUS
17 GROUPS HAVE NOT BEEN SUBJECTED TO THOUGHT REFORM OR TO
18 COERCIVE PERSUASION.

19 THE COURT: WE WILL TAKE OUR MORNING RECESS AND THEN
20 MR. KLEIN CAN RESUME.

21 MR. KLEIN: THANK YOU.

22 (RECESS.)

23 THE COURT: PLEASE PROCEED.

24 MR. KLEIN: THANK YOU, YOUR HONOR.

25

26 DIRECT EXAMINATION (RESUMED)

27 BY MR. KLEIN:

28 Q DR. MOORE, IN YOUR PH.D. STUDIES, DID YOU STUDY

1 LEARNING THEORY?

2 A YES, I DID.

3 Q JUST BRIEFLY, WHAT IS LEARNING THEORY?

4 A IT IS THE STUDY OF HOW PEOPLE LEARN FROM

5 CHILDHOOD TO ADULTHOOD.

6 Q IN YOUR PH.D. THEORIES, DID YOU STUDY COGNITIVE

7 THEORIES?

8 A YES, I DID.

9 Q WHAT ARE COGNITIVE THEORIES?

10 A THE WAY PEOPLE THINK, THE INFLUENCES UPON WAYS

11 PEOPLE THINK.

12 Q IN YOUR PH.D. STUDIES, DID YOU STUDY SOCIAL

13 PSYCHOLOGY?

14 A YES, I DID.

15 Q WHAT IS THAT?

16 A IT IS THE STUDY OF SOCIAL INTERACTION AND

17 MUTUAL INFLUENCES ON PEOPLE AND HOW PEOPLE INFLUENCE OTHERS'

18 BEHAVIORS AND SO FORTH.

19 Q DURING THE COURSE OF YOUR MASTER'S AND PH.D.

20 PROGRAM, DID YOU STUDY THE PSYCHOLOGY OF RELIGIOUS BEHAVIOR?

21 A YES, I DID.

22 Q WHAT IS THAT?

23 A IT IS JUST A STUDY OF THE PSYCHOLOGICAL MEANING

24 AND SIGNIFICANCE OF VARIOUS RELIGIOUS RITUALS, BELIEFS AND

25 PRACTICES IN PEOPLE'S LIVES.

26 Q NOW, I READ YOU THOSE SIX CHARACTERISTICS THAT

27 DR. SINGER TESTIFIED ABOUT.

28 A YES.

1 Q DO YOU HAVE AN OPINION AS TO WHETHER THE
2 PRESENCE OF THOSE SIX CHARACTERISTICS WOULD ENABLE CHURCH
3 UNIVERSAL AND TRIUMPHANT, OR ANY CHURCH, TO INFLUENCE THE
4 BEHAVIOR OF THEIR MEMBERS?

5 A YES.

6 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. MR.
7 KLEIN IS STILL ATTEMPTING TO QUALIFY THIS PERSON AS SOMEONE
8 WITH EXPERTISE IN THE FIELD OF THOUGHT REFORM. IF THAT IS
9 HIS ATTEMPT, MAY I THEN TAKE THIS WITNESS ON VOIR DIRE?

10 THE COURT: YES, YOU MAY.

11 MR. LEVY: THANK YOU, YOUR HONOR.

12

13

VOIR DIRE EXAMINATION

14

BY MR. LEVY:

15

Q DR. MOORE.

16

A YES.

17

18

19

Q HAVE YOU EVER WORKED WITH ANY PRISONERS OF WAR
IN A THERAPEUTIC SETTING WHERE YOU WERE COUNSELING THEM ONE
ON ONE?

20

A NO, I HAVE NOT.

21

22

23

Q WOULD IT BE FAIR TO SAY THAT WHAT YOU KNOW
ABOUT THE THEORIES, THE POPULAR THEORIES OF BRAINWASHING,
YOU READ IN A BOOK SOMEWHERE?

24

25

A YES. IT'S COME FROM STUDIES OF BOOKS AND
ARTICLES.

26

27

Q WHEN YOU STUDIED AT BERKELEY, DID YOU STUDY THE
WORK OF MARGARET SINGER?

28

A I -- I'VE BEEN FAMILIAR WITH HER WRITINGS FOR

1 SOME TIME.

2 Q NOW, WITH RESPONSE TO --

3 A I DID NOT STUDY HER WORK AT BERKELEY. I WAS IN
4 RESIDENCE THERE ON A SABBATICAL LEAVE AND I WAS NOT ENROLLED
5 IN THE UNIVERSITY THERE. I WAS STUDYING IN THE LIBRARIES ON
6 SABBATICAL LEAVE WORKING ON ANTHROPOLOGY.

7 Q DOES THAT MEAN WHILE YOU WERE VISITING THERE,
8 YOU WENT TO THE LIBRARY THERE AND PERFORMED SOME STUDIES?

9 A I WAS A VISITING SCHOLAR. YES, I WAS A
10 VISITING SCHOLAR.

11 Q HAS THERE BEEN ANY NATIONAL BODIES, SCIENTIFIC
12 OR OTHERWISE, THAT HAS RECOGNIZED YOU AS AN EXPERT IN THE
13 FIELD OF THOUGHT REFORM?

14 A OH, NO.

15 Q ARE YOU PUBLISHED IN THE FIELD OF THOUGHT
16 REFORM?

17 A NO. I DO NOT WRITE ON THOUGHT REFORM AS A
18 RESEARCH TOPIC EXCEPT INsofar --

19 Q EXCUSE ME, SIR. THAT WAS NOT MY QUESTION. I
20 JUST ASKED YOU IF YOU WERE PUBLISHED IN THE FIELD OF THOUGHT
21 REFORM?

22 A THE CHAPTER IN MY BOOK ON THE MINORITY
23 RELIGIONS IS THE ONE AREA WHERE I HAVE PUBLISHED IN THIS.

24 Q THAT IS IN THE BOOK YOU CO-WROTE WITH DR. JAMES
25 MELTON, IS IT?

26 A GORDON MELTON.

27 Q GORDON MELTON. PARDON ME. J. GORDON MELTON?

28 A YES.

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1 Q YOU AND HE BOTH AUTHORED THAT BOOK?
2 A THAT'S CORRECT.
3 Q THAT IS ON CULTS AND WHAT ELSE?
4 A IT IS ON -- IT IS TREATING THE ENTIRE --
5 Q WHAT IS THE TITLE?
6 A THE TITLE OF THE BOOK IS "THE CULT EXPERIENCE,
7 RESPONDING TO THE NEW RELIGIOUS PLURALISM."
8 Q OTHER THAN THAT BOOK THAT YOU CO-AUTHORED, HAVE
9 YOU DONE ANY TREATISES OR LEARNED PAPERS OR ABSTRACTS THAT
10 HAVE BEEN ACCEPTED BY ANY PSYCHOLOGICAL OR MEDICAL GROUP IN
11 THE COUNTRY?
12 A WITH REGARD TO THE TOPIC OF THOUGHT REFORM, NO,
13 I HAVE NOT.
14 Q HAVE YOU DONE ANY EXTENDED STUDY IN A
15 PROFESSIONAL SETTING WHERE -- IN A SCHOOL OF HIGHER LEARNING
16 WITH REGARD TO THE SUBJECT OF THOUGHT REFORM?
17 A NO, I HAVE NOT.
18 MR. LEVY: YOUR HONOR, I BELIEVE THIS WITNESS HAS BY
19 HIS ABSENCE OF FORMAL STUDY OR PROFESSIONAL STUDY OR
20 PROFESSIONAL RECOGNITION OR MEDICAL RECOGNITION BY HIS OWN
21 STATEMENTS HAS SUCCEEDED IN DISQUALIFYING HIMSELF AS AN
22 EXPERT IN THE FIELD OF THOUGHT REFORM.
23 THE COURT: DO YOU WANT TO ASK HIM SOME QUESTIONS?
24 MR. KLEIN: YOUR HONOR, YES, I DO.
25
26 DIRECT EXAMINATION (RESUMED)
27 BY MR. KLEIN:
28 Q THE TERM THOUGHT REFORM, WHAT DOES THAT MEAN?

1 MR. LEVY: I AM GOING TO OBJECT --

2 Q BY MR. KLEIN: YOU HAVE ANSWERED A NUMBER OF
3 QUESTIONS WHERE YOU HAVE BEEN ASKED IF YOU ARE AN EXPERT IN
4 THOUGHT REFORM. WHEN YOU USE THE TERM, WHAT ARE YOU
5 REFERRING TO?

6 A I AM REFERRING TO --

7 THE COURT: WHY DON'T YOU ASK HIM, "WHAT DOES IT MEAN
8 TO YOU?"

9 Q BY MR. KLEIN: WELL, WHAT DOES IT MEAN TO YOU,
10 THOUGHT REFORM?

11 A IT MEANS THE ABILITY TO CONTROL, TOTALLY
12 CONTROL ANOTHER PERSON'S BEHAVIOR SO THAT THEY ARE NOT ABLE
13 TO ACT OUT OF THEIR OWN FREE WILL AND AUTONOMY IN MAKING
14 DECISIONS ABOUT THEIR BEHAVIOR.

15 Q SUCH AS OUR KOREAN WAR SITUATION?

16 A YES.

17 Q IS THAT THOUGHT REFORM?

18 A OR --

19 MR. LEVY: AGAIN, YOUR HONOR, I AM GOING TO HAVE TO
20 OBJECT. I DON'T CARE WHETHER MR. KLEIN APPROACHES IT
21 SIDEWAYS OR STANDING ON HIS HEAD, HE IS STILL ATTEMPTING
22 TO --

23 THE COURT: SUSTAINED.

24 Q BY MR. KLEIN: WHAT ARE EXAMPLES OF THOUGHT
25 REFORM?

26 MR. LEVY: OBJECTION, YOUR HONOR. NO EXPERTISE IN
27 THOUGHT REFORM WITH THIS WITNESS.

28 THE COURT: SUSTAINED.

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1 MR. KLEIN: YOUR HONOR, HE HAS ASKED HIM A NUMBER OF
2 QUESTIONS ON THOUGHT REFORM. I AM ASKING AS HE'S USED THE
3 TERM, AS HE IS AWARE OF IT, AS HE TESTIFIED ABOUT HIS
4 EXPERIENCE OR LACK THEREOF --

5 THE COURT: I THOUGHT YOU WERE GOING TO TRY TO
6 ESTABLISH --

7 MR. KLEIN: WHAT WE HAVE ESTABLISHED -- MAYBE WE
8 SHOULD BE HEARD AT THE BENCH.

9 THE COURT: NO. THIS IS YOUR OPPORTUNITY TO ASK HIM
10 SOME QUESTIONS TO ESTABLISH HIS QUALIFICATIONS.

11 Q BY MR. KLEIN: DO YOU HAVE ANY EXPERTISE IN
12 HUMAN BEHAVIOR AS IT APPLIES TO RELIGIOUS GROUPS AND
13 INFLUENCE AND CONTROL THOSE GROUPS MIGHT HAVE OVER
14 INDIVIDUALS?

15 A YES, I HAVE.

16 MR. LEVY: I AM GOING TO HAVE TO OBJECT TO THE
17 QUESTION, YOUR HONOR. IT IS COMPOUND, COMPLEX AND CONFUSING
18 QUESTION.

19 THE COURT: IT IS COMPOUND, BUT THE ANSWER CAN STAND.

20 Q BY MR. KLEIN: WHAT IS YOUR EXPERIENCE IN THAT
21 AREA?

22 A WELL, I HAVE -- MY CAREER HAS BEEN INVOLVED IN
23 THE STUDY OF RELIGIOUS BEHAVIOR AND RELIGIOUS PRACTICE AND
24 THE PSYCHOLOGY OF RELIGIOUS BEHAVIOR AND RELIGIOUS PRACTICES
25 SUCH AS THOSE INVOLVED IN THIS CASE.

26 Q HOW MANY YEARS HAVE YOU SPENT DOING FIELD --
27 WITHDRAWN.

28 HAVE YOU DONE FIELD INTERVIEWS INVOLVING THE

1 ISSUES OF CONTROL OF INDIVIDUALS BY RELIGIOUS GROUPS?
2 A YES, I HAVE.
3 Q HOW MANY YEARS HAVE YOU SPENT DOING THAT?
4 A APPROXIMATELY 13.
5 Q DURING YOUR EDUCATIONAL YEARS, HOW MANY YEARS
6 HAVE YOU SPENT STUDYING THE EFFECTS -- STUDYING INFORMATION,
7 STUDYING COURSES, RELATING TO THE EFFECTS THAT DIFFERENT
8 RELIGIONS HAVE ON INFLUENCING AND CONTROLLING INDIVIDUALS?
9 HOW MANY YEARS HAVE YOU DEVOTED TO THAT?
10 MR. LEVY: I AM GOING TO HAVE TO OBJECT TO THAT, YOUR
11 HONOR. THAT AGAIN IS COMPOUND. THERE ARE SEVEN DIFFERENT
12 PARTS TO IT.
13 THE COURT: HE CAN ANSWER.
14 THE WITNESS: WELL, ALL --
15 THE COURT: YOU MEAN FULL YEARS?
16 MR. KLEIN: FULL YEARS.
17 THE WITNESS: PROBABLY A TOTAL OF -- PROBABLY A TOTAL
18 OF ABOUT A DOZEN YEARS TO STUDY THAT.
19 Q BY MR. KLEIN: AND DURING THE YEARS THAT YOU'VE
20 BEEN A PROFESSOR OR AN ASSISTANT PROFESSOR, HAVE YOU HAD
21 OCCASION TO TEACH ANY COURSES DEALING WITH THE INFLUENCE AND
22 CONTROL RELIGION HAS ON INDIVIDUALS?
23 A YES, I HAVE.
24 Q HOW MANY YEARS HAVE YOU TAUGHT SUBJECTS --
25 TAUGHT CLASSES THAT DEALT WITH THAT?
26 A SINCE 1973.
27 Q DURING THE COUNSELING -- YOU SAID YOU HAD A
28 PRIVATE PRACTICE IN COUNSELING -- HAVE YOU DEALT IN YOUR

1 COUNSELING WITH THE CONTROL AND INFLUENCE THAT RELIGIOUS
2 GROUPS AND ORGANIZATIONS EXERT UPON INDIVIDUALS?

3 A YES, I HAVE.

4 Q HOW MANY YEARS HAVE YOU BEEN DOING THAT
5 COUNSELING?

6 A SINCE 1973.

7 Q THAT IS ALL THE QUESTIONS I HAVE ON THE
8 QUALIFICATIONS OF THIS EXPERT, YOUR HONOR. I AM GOING TO
9 ASK MY QUESTION NOW UNLESS WE WANT TO HEAR SOME MORE AT THE
10 BENCH.

11 THE COURT: HE CAN ANSWER.

12 Q BY MR. KLEIN: DO YOU HAVE AN OPINION AS TO
13 WHETHER THE SIX CHARACTERISTICS THAT I READ EARLIER FROM
14 MRS. SINGER'S TESTIMONY WOULD ENABLE THIS CHURCH OR ANY
15 CHURCH TO INFLUENCE THE BEHAVIOR OF ITS MEMBERS?

16 A YES, I DO.

17 Q WHAT IS YOUR OPINION?

18 MR. LEVY: AGAIN, I AM GOING TO HAVE TO OBJECT, YOUR
19 HONOR.

20 THE COURT: HE CAN ANSWER.

21 THE WITNESS: YES, I BELIEVE IT WOULD ENABLE THEM TO
22 INFLUENCE THE BEHAVIOR OF THE MEMBERS.

23 Q BY MR. KLEIN: DO YOU HAVE AN OPINION WHETHER
24 THOSE SIX CHARACTERISTICS WOULD ENABLE THIS CHURCH OR ANY
25 CHURCH TO CONTROL THE BEHAVIOR OF ITS MEMBERS?

26 A YES, I DO.

27 Q WHAT IS YOUR OPINION?

28 A MY OPINION IS THAT IT WOULD ENABLE THEM TO

1 CONTROL PERSONS IN THE GROUP TO A DEGREE.

2 Q TO A DEGREE?

3 A YES.

4 Q COULD YOU EXPLAIN THOSE TWO ANSWERS, HOW IT
5 WOULD INFLUENCE AND HOW IT WOULD ENABLE A CHURCH TO CONTROL
6 THE BEHAVIOR OF ITS MEMBERS TO A DEGREE? COULD YOU EXPLAIN
7 WHAT YOU MEAN BY THAT?

8 A SURE. BECAUSE IN ANY RELIGIOUS GROUP, THERE
9 ARE ALWAYS RITUAL BEHAVIORS WHICH ARE DESIGNED TO FORM THE
10 PERSON INTO WAYS OF BEHAVING AND THINKING AND FEELING WHICH
11 ARE CONSISTENT WITH THE VALUES AND IDEALS OF THAT GROUP.

12 TAKE, FOR EXAMPLE, IN THE ROMAN CATHOLIC CHURCH
13 THE WORK THAT IS DONE IN THE LIVES OF MONKS AND NUNS,
14 PARTICULARLY, SAY, FOR EXAMPLE, A JESUIT. IN A RELIGIOUS
15 GROUP LIKE THE JESUITS, FOR EXAMPLE, THE EXERCISES OF
16 IGNATIUS LOYOLA, WHICH A PERSON WHO IS A JESUIT HAS TO
17 PARTICIPATE IN -- IT IS A RITUAL BEHAVIOR, AND IT IS
18 INTENDED TO INFLUENCE THE BELIEF, VALUES AND BEHAVIORS OF A
19 JESUIT, A ROMAN CATHOLIC PRIEST WHO IS A JESUIT.

20 AND IT IS -- IT IS INDEED INFLUENTIAL ON THE
21 LIFE OF THE PERSON OR IT WOULD NOT HAVE BEEN KEPT BY THE
22 JESUITS FOR HUNDREDS OF YEARS.

23 AND I CAN GIVE YOU MANY OTHER EXAMPLES IN WHICH
24 THIS IS THE CASE. THEY ARE CALLED FORMATION TECHNIQUES. IN
25 FACT, IN ROMAN CATHOLIC SEMINARIES, THEY HAVE WHAT IS KNOWN
26 AS DIRECTORS OF FORMATION.

27 AND THE TASK OF DIRECTORS OF FORMATION IS
28 PRECISELY THIS THAT WE ARE TALKING ABOUT, TO COME UP WITH

1 MEANS OF HELPING THE PERSON DEVELOP IN SUCH A WAY THAT IT IS
2 CONSISTENT WITH THE IDEALS OF THAT ORDER, WHETHER IT IS A
3 FRANCISCAN ORDER OR OUR LADY OF FATIMA OR WHATEVER THE ORDER
4 IS.

5 AND THIS IS STANDARD RELIGIOUS BEHAVIOR AND IT
6 IS INFLUENTIAL. IF IT WERE NOT INFLUENTIAL, THEN IT WOULD
7 HAVE BEEN GIVEN UP BY THESE RELIGIOUS BODIES CENTURIES AGO.

8 Q DO OTHER INSTITUTIONS, IN ADDITION TO
9 RELIGIONS, EMPLOY THE SIX CHARACTERISTICS THAT I HAVE READ
10 TO YOU IN ORDER TO INFLUENCE THEIR MEMBERS?

11 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. WE
12 STILL HAVE NOT QUALIFIED THIS GENTLEMAN AS AN EXPERT IN
13 THOUGHT REFORM AND BY --

14 THE COURT: I AM GOING TO LET HIM ANSWER.

15 THE WITNESS: YES, THERE ARE. THERE ARE A NUMBER OF
16 NOTEWORTHY ONES, I MEAN, THAT WE ARE ALL FAMILIAR WITH.

17 FOR EXAMPLE, IN MILITARY BASIC TRAINING, ALL OF
18 THE CHARACTERISTICS THAT SHE LISTS ARE PRESENT. EVERY ONE
19 OF THEM. BUT WE DO NOT CONSIDER MILITARY BASIC TRAINING TO
20 BE THOUGHT REFORM OR COERCIVE PERSUASION IN THE WAY THAT DR.
21 SINGER IS USING IT. BUT EVERY ONE OF THOSE BEHAVIORS ARE
22 EMPLOYED IN MILITARY BASIC TRAINING. ANYONE FAMILIAR WITH
23 THAT REALIZES IT.

24 SOCIETY USES --

25 MR. LEVY: EXCUSE ME. THERE IS NO QUESTION PENDING.
26 ARE WE HAVING A LECTURE OR WHAT?

27 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

28 Q BY MR. KLEIN: NOW, YOU SAID THAT, IN ANSWER TO

1 MY QUESTIONS, IT WAS YOUR OPINION THAT THIS CHURCH AND OTHER
2 CHURCHES COULD USE THOSE SIX CHARACTERISTICS TO CONTROL
3 PEOPLE TO A DEGREE?

4 A YES.

5 Q WOULD YOU EXPLAIN WHAT YOU MEAN BY "TO A
6 DEGREE"?

7 A WELL, ANY PARTICIPATION IN A RELIGIOUS GROUP IS
8 AN INTERACTIONAL PHENOMENON. THE INDIVIDUAL WHO JOINS A
9 GROUP HAS AN AGENDA. THEY HAVE VALUES AND GOALS THAT THEY
10 HAVE AND THEY HAVE THINGS THAT THEY WANT OUT OF THE
11 PARTICIPATION IN THE GROUP. AND THE GROUP HAS VALUES AND
12 GOALS AND THINGS THAT THE GROUP WANTS OUT OF THE INDIVIDUAL.

13 AND SO AS LONG AS AN INDIVIDUAL IS GETTING OUT
14 OF THE GROUP WHAT THE INDIVIDUAL WANTS FROM THE GROUP, THEN
15 THE INDIVIDUAL WILL COOPERATE WITH THE ATTEMPTS OF THE
16 INSTITUTION TO INFLUENCE OR CONTROL HIS OR HER BEHAVIOR.

17 YOU SEE THIS IN EVERY CHURCH. I MEAN IF I AM A
18 MEMBER OF A CHURCH THAT DOESN'T BELIEVE IN DANCING AND I
19 REALLY WANT TO BE A PART OF THAT CHURCH FOR RELIGIOUS
20 REASONS, THEN I WILL REFRAIN FROM DANCING OR AT LEAST
21 LETTING THE LEADERS OF THE CHURCH KNOW THAT I DANCE.

22 AND SO AS LONG AS I REALLY WANT TO BE A PART OF
23 THAT CHURCH, I WILL LET THEM INFLUENCE MY BEHAVIOR QUITE A
24 BIT. AND SO THEY DO CONTROL MY BEHAVIOR TO THE EXTENT THAT
25 I AM WILLING TO CONTINUE MY AFFILIATION WITH THEM. AND THIS
26 IS TRUE IN EVERY RELIGIOUS GROUP THAT YOU WILL STUDY.

27 THERE COMES A TIME WHEN AN INDIVIDUAL IS
28 DISAPPOINTED IN A GROUP AND THEN THE INDIVIDUAL WILL STOP

1 CONFORMING HIS BEHAVIOR TO THE ATTEMPTS OF THE GROUP OR THE
2 RELIGION TO CONTROL THEM.

3 FOR EXAMPLE, LOOK AT THE PHENOMENON OF ALL THE
4 PRIESTS AND NUNS LEAVING THE ROMAN CATHOLIC CHURCH NOW.
5 THEY HAD CONTROLS IMPOSED UPON THEM WITH REGARD TO THEIR
6 CELIBACY, FOR EXAMPLE, ABILITY TO MARRY, HAVE CHILDREN AND
7 SO FORTH. AND FOR MANY YEARS, MANY OF THEM -- AND I SEE
8 THESE PEOPLE IN TREATMENT.

9 I DO PSYCHOTHERAPY WITH PEOPLE WHO ARE
10 CURRENTLY PRIESTS AND NUNS AND PEOPLE WHO HAVE LEFT. AND IT
11 IS A VERY SIMILAR KIND OF THING. FOR A LONG TIME, THEY GAVE
12 UP THIS -- THEY ALLOWED THE CHURCH TO CONTROL THEIR SEXUAL
13 BEHAVIOR. AND AFTER A CERTAIN POINT, THEY MAKE A DECISION
14 THEY DON'T WANT THIS TO BE THAT WAY ANYMORE AND THEN THEY
15 LEAVE THE PRIESTHOOD.

16 IT IS A VERY SIMILAR KIND OF PHENOMENON. IT
17 DEPENDS ON WHAT THE INDIVIDUAL IS WILLING TO GIVE UP TO BE
18 AFFILIATED WITH A GROUP AND WHAT THE INDIVIDUAL IS GETTING
19 OUT OF BEING AFFILIATED WITH THE GROUP.

20 Q WHAT IS TRANSFERENCE? ✓

21 A TRANSFERENCE IS A PHENOMENON THAT YOU SEE THAT
22 IS USUALLY TALKED ABOUT IN THE PRACTICE OF PSYCHOTHERAPY,
23 BUT WHICH IS ALSO SEEN IN RELIGIOUS GROUPS. IT IS THE
24 PHENOMENON IN WHICH A PERSON PROJECTS CERTAIN TRAITS AND
25 QUALITIES UPON A LEADER OR AN ANALYST, A PSYCHOTHERAPIST,
26 THAT THE PERSON WANTS TO SEE IN THE LEADER OR THE
27 PSYCHOTHERAPIST.

28 Q IN YOUR EXPERIENCE, HAVE YOU ENCOUNTERED

1 SITUATIONS WHERE INDIVIDUALS WHO YOU WERE COUNSELING OR YOU
2 WERE INTERVIEWING HAD USED TRANSFERENCE WITH RESPECT TO A
3 RELIGIOUS LEADER?

4 A OH, THERE IS A LOT OF EVIDENCE THAT THE
5 FEELINGS THAT MEMBERS OF VARIOUS RELIGIOUS GROUPS HAVE
6 TOWARD THEIR RELIGIOUS LEADER ARE GROUNDED IN WHAT WE CALL
7 TRANSFERENCE DYNAMICS. USUALLY THIS IS CHARACTERIZED BY
8 IDEALIZATION. ONE SEES THE PERSON, THE LEADER, JUST LIKE
9 ONE SEES THE THERAPIST AS IMBUED WITH VERY, VERY POSITIVE
10 ALMOST GOD-LIKE TRAITS SOMETIMES.

11 Q IS THAT CALLED A POSITIVE TRANSFERENCE?

12 A YES.

13 Q IS THERE ANOTHER PHENOMENON CALLED NEGATIVE
14 TRANSFERENCE?

15 A YES, THERE IS.

16 Q WHAT IS THAT?

17 A WELL, IN NEGATIVE TRANSFERENCE, THE PERSON
18 BEGINS TO VIEW THE LEADER OR THE PSYCHOTHERAPIST AS JUST AS
19 BAD AS THEY HAD PREVIOUSLY VIEWED THEM AS GOOD.

20 AND SO IN EFFECT WHAT YOU DO IS THERE IS A
21 MEXICAN JUMPING BEAN KIND OF EFFECT. THERE IS A FLIP FLOP.
22 THERE IS A FLIP FLOP FROM SEEING SOMEBODY AS JUST WITHOUT
23 FAULT TO SEEING THEM AS FULL OF FAULTS. AND IT IS USUALLY ✓
24 BASED ON A DISAPPOINTMENT, SOME DISAPPOINTMENT THAT OCCURS
25 WITH THE THERAPIST OR WITH THE RELIGIOUS LEADER.

26 YOU SEE THIS HAPPENING A LOT OF THE OF THE TIME
27 IN CONGREGATIONS WHERE A PASTOR WILL BE VERY DEEPLY BELOVED
28 BY PARISHONERS --

1 MR. LEVY: EXCUSE ME, YOUR HONOR. I THINK THE
2 QUESTION HAS BEEN ANSWERED. ARE WE HAVING ANOTHER LECTURE?

3 THE COURT: I THINK IT IS TIME FOR ANOTHER QUESTION.

4 Q BY MR. KLEIN: IS NEGATIVE TRANSFERENCE
5 SOMETHING THAT YOU'VE ALSO SEEN IN YOUR COUNSELING AND
6 RESEARCH ON INDIVIDUALS WHO HAVE LEFT RELIGIOUS
7 ORGANIZATIONS?

8 A YES.

9 Q DO YOU HAVE AN OPINION, BASED UPON FACTS OF
10 THIS CASE, AS TO WHETHER THAT BEHAVIOR OF MR. MULL IS
11 CONSISTENT WITH THAT OF A PERSON WHO HAS EXHIBITED BOTH
12 POSITIVE AND THEN NEGATIVE TRANSFERENCE WITH RESPECT TO
13 CHURCH UNIVERSAL AND TRIUMPHANT AND WITH RESPECT TO
14 ELIZABETH CLARE PROPHET?

15 A YES, I DO.

16 MR. LEVY: I AM GOING TO OBJECT TO THAT OPINION, YOUR
17 HONOR, AND I WOULD LIKE TO TAKE THIS WITNESS ON VOIR DIRE
18 WITH REGARD TO IT.

19 THE COURT: ALL RIGHT.

20

21

VOIR DIRE EXAMINATION

22

BY MR. LEVY:

23

Q DOCTOR, DID YOU EVER MEET WITH GREGORY MULL?

24

A NO, I DID NOT.

25

Q DID YOU EVER COUNSEL WITH GREGORY MULL?

26

A NEVER DID.

27

Q THE ONLY THING YOU KNOW ABOUT GREGORY MULL IS

28

WHAT YOU READ IN THE TRANSCRIPTS FROM THIS TRIAL AND HIS

1 DEPOSITION?

2 A THAT'S CORRECT, SIR.

3 Q ARE YOU AWARE THAT WHEN HIS DEPOSITION WAS
4 TAKEN, HE WAS RECOVERING FROM A STROKE-LIKE INCIDENT?

5 MR. KLEIN: I AM GOING TO OBJECT TO THAT, YOUR HONOR.
6 I THINK THAT IT ASSUMES FACTS NOT IN EVIDENCE AS TO WHAT HIS
7 CAPABILITIES WERE.

8 THE COURT: THE OBJECTION IS OVERRULED.

9 Q BY MR. LEVY: ARE YOU AWARE THAT WHEN THE
10 DEPOSITION WAS TAKEN, MR. MULL WAS RECOVERING FROM A
11 STROKE-LIKE INCIDENT?

12 A YES, I AM.

13 Q IN YOUR EXPERIENCE, WOULD SOMEONE WHO HAS JUST
14 HAD AN EPISODE WITH FIBROMUSCULAR HYPERTROPHY BE HAMPERED IN
15 RESPONDING TO QUESTIONS?

16 MR. KLEIN: I AM GOING TO OBJECT AS TO THE LACK OF
17 EXPERTISE OF THIS WITNESS TO ANSWER THAT QUESTION.

18 THE COURT: HE CAN ANSWER.

19 THE WITNESS: I'M SURE IT WOULD INFLUENCE HIS ABILITY
20 TO ANSWER QUESTIONS, SIR.

21 Q BY MR. LEVY: NOW, CONSIDERING THAT YOU ARE
22 SURE THAT IT WOULD INFLUENCE HIS ABILITY TO ANSWER
23 QUESTIONS, IF IN THE EVENT THOSE QUESTIONS WERE NOT ANSWERED
24 AND WERE NOT TOTALLY RESPONSIVE TO THE QUESTION, WOULD THAT
25 HAVE A TENDENCY WITHIN YOUR TRAINING TO CAUSE YOUR OPINION
26 TO BE BASED UPON SOMEONE'S LACK OF ABILITY AS OPPOSED TO
27 ANYTHING THAT YOU MIGHT BE ABLE TO SEE AND OBSERVE?

28 MR. KLEIN: OBJECTION. VAGUE AND AMBIGUOUS AND

1 COMPOUND.

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

3 Q BY MR. LEVY: IS THERE A POSSIBILITY, SIR, THAT
4 KNOWING THAT SOMEONE WOULD BE INCAPACITATED, THAT YOUR
5 KNOWING THAT, IT MAY STIFLE YOUR ABILITY TO MAKE AN ACCURATE
6 APPRAISAL AS TO FACTS REGARDING THAT INDIVIDUAL?

7 MR. KLEIN: I AM GOING TO OBJECT. IT
8 MISCHARACTERIZES THE EVIDENCE, YOUR HONOR.

9 THE COURT: HE CAN ANSWER.

10 THE WITNESS: WITH REGARD TO THIS PARTICULAR ISSUE
11 THAT WE ARE DISCUSSING, I DON'T THINK IT WOULD HAVE ANY
12 INFLUENCE.

13 Q BY MR. LEVY: WE ARE TALKING ABOUT
14 TRANSFERENCE.

15 A YES. EVIDENCE OF IDEALIZATION AND THEN THE
16 REVERSAL OF THAT.

17 Q CAN YOU REFER ME TO ANY PORTION WITHIN EITHER
18 MR. MULL'S TESTIMONY HERE OR WITHIN THE SIX DEPOSITIONS THAT
19 ADDRESSES ITSELF TO IDEALIZATION?

20 A YES. IN THE LETTERS WHICH I READ --

21 Q EXCUSE ME, SIR. I SAID THE DEPOSITIONS OR THE
22 TESTIMONY HERE.

23 A YES. THE -- THE TESTIMONY INCLUDES DISCUSSIONS
24 OF HIS FEELINGS WITH REGARD TO BEING FRIENDS WITH MRS.
25 PROPHET AND HIS FEELINGS ABOUT BEING IN CHARGE OF THE DESIGN
26 OF THE NEW JERUSALEM THAT INDICATE A GREAT DEAL OF JOY AND A
27 PARTICIPATION IN HER GREATNESS WHICH IS CHARACTERISTIC OF
28 IDEALIZATION.

1 THE QUESTION THAT I WAS ASKED WAS WAS THIS
2 CONSISTENT. I AM NOT MAKING ANY CLAIM TO HAVE --

3 Q EXCUSE ME. THERE IS NO QUESTION PENDING RIGHT
4 NOW. DO YOU JUST LIKE TO LECTURE?

5 MR. KLEIN: I AM GOING TO OBJECT TO THAT COMMENT BY
6 COUNSEL, YOUR HONOR.

7 THE COURT: WELL, WE COULD PROCEED MORE EFFICIENTLY
8 AND MORE SATISFACTORILY IF THE WITNESS WOULD SIMPLY ANSWER
9 THE QUESTIONS ASKED OF HIM AND WE CAN GO ON TO THE NEXT
10 QUESTION.

11 TRY TO AVOID SOLILOQUIES.

12 THE WITNESS: OKAY.

13 Q BY MR. LEVY: YOU SAY IN THE DEPOSITION, MR.
14 MULL REFERRED TO HIS PARTICIPATION IN BUILDING THE NEW
15 JERUSALEM; IS THAT CORRECT?

16 A HE WAS ASKED HOW HE FELT ABOUT PARTICIPATING IN
17 THIS.

18 Q AND HIS RESPONSE WAS?

19 A HIS RESPONSE WAS TO THE EFFECT THAT HE FELT
20 LIKE ALMOST LIKE MICHELANGELO INVOLVED IN THIS PROCESS. IT
21 WAS A FEELING OF PARTICIPATING IN REALLY SOMETHING REALLY
22 GREAT AND VERY SIGNIFICANT AND VERY MEANINGFUL AND BEING
23 CLOSE FRIENDS WITH THE LEADER OF THE CHURCH. THERE IS A
24 GREAT DEAL OF A SENSE OF HOW HE HAD IDEALIZED HER.

25 Q IS THERE ONE SPECIFIC LINE OR ONE SPECIFIC
26 SENTENCE THAT YOU ARE REFERRING TO THAT SAYS, "I HAVE
27 IDEALIZED ELIZABETH CLARE PROPHET," OR IS THAT JUST YOUR
28 CONCLUSION OR YOUR CONJECTURE BASED ON A MAN WHO TESTIFIED,

1 "I WAS VERY HAPPY TO GO TO CAMELOT TO DESIGN THE NEW
2 JERUSALEM"?

3 A IT IS BASED ON MY READING OF THE LETTERS AND
4 THE READING OF THE DEPOSITIONS.

5 Q AGAIN WE ARE BACK TO THE LETTERS. THE QUESTION
6 HAS TO DO WITH THE DEPOSITIONS AND THE TESTIMONY IN THIS
7 COURT.

8 A IT IS BASED ON MY JUDGMENT ABOUT THIS -- ABOUT
9 THE RELATIONSHIP -- BASED ON READING THE DEPOSITION. I
10 CANNOT REFER YOU -- I DON'T HAVE A PHOTOGRAPHIC MEMORY SO I
11 CAN'T REFER YOU TO A PARTICULAR LINE OTHER THAN THIS
12 DISCUSSION I THINK -- I THINK THE COMMENT ABOUT -- THE
13 SECTION ABOUT TALKING ABOUT THE NEW JERUSALEM IS SOMEWHERE
14 PAGE 292 OF THE TRIAL TESTIMONY.

15 Q HAVE YOU EVER PARTICIPATED IN ANY KIND OF GROUP
16 ACTIVITY? I ASK YOU PERSONALLY HAVE YOU EVER PARTICIPATED
17 IN ANY GROUP ACTIVITY?

18 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
19 AMBIGUOUS AND ALSO BEYOND THE VOIR DIRE, YOUR HONOR.

20 THE COURT: SUSTAINED.

21 Q BY MR. LEVY: YOU TESTIFIED THAT MR. MULL
22 APPEARED TO LIKE ELIZABETH CLARE PROPHET?

23 A TO IDEALIZE HER.

24 Q TO IDEALIZE HER. AND THAT IS PREDICATED UPON
25 THE FACT THAT HE WAS FRIENDS WITH HER?

26 A IT WAS PREDICATED ON MY READING OF THE LETTERS
27 WHICH HAD BEEN SUBMITTED INTO TESTIMONY HERE.

28 Q NOW, BASED UPON THE DEPOSITIONS AND THE

1 TESTIMONY HERE IN THIS COURT, IS THERE ANYTHING SPECIFICALLY
2 OTHER THAN MR. MULL FELT THAT HE WAS A FRIEND OF ELIZABETH
3 CLARE PROPHET AND THE FACT THAT HE WENT TO THE NEW JERUSALEM
4 TO DESIGN CAMELOT THAT ASSIST YOU IN CONCLUDING THAT HE
5 IDEALIZED ELIZABETH CLARE PROPHET?

6 A JUST WHAT I'VE SAID.

7 Q THAT HE WAS GOING THERE TO DESIGN THE NEW
8 JERUSALEM AND HE WAS A FRIEND OF HERS?

9 A YOU HAVE TO UNDERSTAND WHAT IT WOULD MEAN TO
10 SOMEONE TO TALK ABOUT THE NEW JERUSALEM. THAT IS THE HOLY
11 CITY.

12 Q EXCUSE ME, SIR?

13 A THAT IS THE HOLY CITY. TO FEEL LIKE ONE IS
14 MICHELANGELO IS TO FEEL LIKE ONE IS THE ASSISTANT TO THE
15 POPE IN CREATING THE SISTINE CHAPEL OR SOMETHING LIKE THAT.
16 SO THOSE COMMENTS, IT SEEMS TO ME, ARE SIGNIFICANT COMMENTS.

17 Q AND YOU GET THIS ABOUT MR. MULL FROM NOT EVER
18 HAVING TALKED TO HIM, THAT IS YOUR -- JUST YOUR CONCLUSION?

19 A I JUST ASSUMED THAT WHAT HAS BEEN PUT INTO
20 EVIDENCE FOR THE CASE IS ACCURATE AND -- IN TERMS OF THE
21 CHARACTERIZATIONS AND THE LETTERS AND THE DEPOSITIONS. I
22 MAKE NO CLAIM TO HAVE -- TO BEING ABLE TO MAKE A DEFINITIVE
23 JUDGMENT ABOUT THIS AT ALL.

24 THE QUESTION ASKED ME WAS, "IS WHAT YOU HAVE
25 SEEN CONSISTENT WITH YOUR UNDERSTANDING?" SO I AM MAKING NO
26 CLAIM TO BE ABLE TO MAKE A DEFINITIVE JUDGMENT ABOUT THE
27 PERSONALITY OF MR. MULL.

28 Q I SEE. WHAT YOU ARE DOING THEN, IF I

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1 UNDERSTAND YOU CORRECTLY, IS YOU ARE JUST TAKING YOUR BEST
2 GUESS BASED ON HAVING SEEN SOME DEPOSITIONS AND SEEN SOME
3 TRIAL TESTIMONY HERE AND THE LETTERS THAT YOU KEEP REFERRING
4 TO?

5 A I WAS ANSWERING A VERY SPECIFIC QUESTION, YES.

6 Q YOUR OPINION IS THEN BASED NOT ON EVER HAVING
7 SEEN OR SPOKEN TO MR. MULL?

8 A THAT'S CORRECT.

9 Q AND UNDERSTANDING THAT MR. MULL AT THE TIME OF
10 THE DEPOSITION AND AT THE TIME OF THE TRIAL, AS A MATTER OF
11 FACT, WAS AND STILL IS RECOVERING FROM A DISABLING DISEASE?

12 A YES, I AM AWARE OF THAT.

13 MR. LEVY: THANK YOU. I HAVE NOTHING FURTHER, YOUR
14 HONOR, AT THIS TIME.

15

16

DIRECT EXAMINATION (RESUMED)

17

BY MR. KLEIN:

18

19

20

21

22

23

Q BY THE WAY, WHEN YOU MADE THE REFERENCE TO PAGE
292 OF THE TRANSCRIPT, WERE YOU REFERRING TO THE QUESTION
ASKED BY ME AND TO MR. MULL, "AND DID YOU EVER SAY THAT YOU
FELT LIKE MICHELANGELO WORKING FOR THE CATHOLIC CHURCH WHEN
YOU WENT THERE," AND HIS ANSWER WAS, "YES"? IS THAT WHAT
YOU ARE REFERRING TO?

24

A (NODS HEAD UP AND DOWN.)

25

Q YOU HAVE TO --

26

A YES. YES, IT WAS.

27

28

Q I WILL REPEAT THE QUESTION THAT I HAD ASKED
THAT MR. LEVY HAD OBJECTED TO, WHICH IS DO YOU HAVE AN

1 OPINION BASED ON THE KNOWLEDGE OF THE FACTS OF THIS CASE
2 PLUS YOUR OTHER EXPERIENCE AND LEARNING IN THE FIELD OF
3 PSYCHOLOGY AS TO WHETHER THE BEHAVIOR OF MR. MULL IS
4 CONSISTENT WITH THAT OF A PERSON EXHIBITING FIRST POSITIVE
5 AND THEN NEGATIVE TRANSFERENCE WITH RESPECT TO THIS CHURCH
6 AND ELIZABETH CLARE PROPHET?

7 A YES, I DO HAVE AN OPINION.

8 Q WHAT IS THAT OPINION?

9 A THE OPINION IS THAT IT IS CONSISTENT.

10 WHAT I SEE BASED ON THIS --

11 THE COURT: I THINK YOU'VE ANSWERED THE QUESTION.

12 Q BY MR. KLEIN: COULD YOU EXPLAIN WHY IT IS
13 CONSISTENT?

14 A WELL, IT IS VERY COMMON BEHAVIOR IN RELIGIOUS
15 GROUPS TO IDEALIZE THE PASTOR OR THE PRIEST OR THE BISHOP
16 AND TO ASCRIBE TO THEM TRAITS THAT ARE ALMOST SUPERHUMAN.
17 AND THEN LATER ON, WHEN IN SOME WAY THE PERSON DISAPPOINTS
18 YOU, TO REALLY FEEL TERRIBLY HURT AND TO THEN FEEL THAT
19 YOU'VE BEEN TOTALLY DUPED, TOTALLY BILKED, TOTALLY BETRAYED
20 AND TO BE ENORMOUSLY FILLED WITH RAGE.

21 IF YOU STUDY WHAT HAPPENS IN CONGREGATIONAL
22 LIFE, THIS HAPPENS A LOT. AND THIS IS WHY A LOT OF PASTORS
23 ARE REMOVED FROM THEIR PASTORATES AND HAVE TO MOVE TO NEW
24 CHURCHES. BECAUSE ONE MONTH THE CONGREGATION MAY THINK THEY
25 ARE THE GREATEST THING GOING, AND THE NEXT MONTH THAT SHIFTS
26 AND FEEL THAT THEY ARE LOUSY. AND THAT HAPPENS A LOT.

27 AND ANYBODY THAT STUDIES CONGREGATIONAL LIFE IN
28 VARIOUS RELIGIONS WILL DOCUMENT THAT WITH CASE AFTER CASE

1 AFTER CASE. IT IS NOT AT ALL AN UNUSUAL PHENOMENA.

2 Q ARE YOU INVOLVED IN ANY COURSES FOR PASTORS
3 THAT DEAL WITH THIS QUESTION OF TRANSFERENCE?

4 A OH, YES.

5 Q DO YOU PERSONALLY TEACH ANY OF THOSE OR COUNSEL
6 ANY PASTORS?

7 A YES. I TEACH COURSES RELATING TO THAT AND I
8 TEACH COURSES IN PRACTICUMS ABOUT HOW TO DEAL WITH
9 TRANSFERENCE PHENOMENA IN THE PARISH AND IN THE CONGREGATION
10 IN A CONSTRUCTIVE WAY.

11 AND I TEACH PSYCHOTHERAPISTS COURSES. RIGHT
12 NOW I AM TEACHING A GRADUATE DOCTORAL SEMINAR IN
13 TRANSFERENCE AND COUNTER-TRANSFERENCE IN WHICH I AM TEACHING
14 PSYCHOTHERAPISTS ABOUT THE VARIOUS LITERATURE AND THE WAYS
15 OF COPING WITH TRANSFERENCE AND COUNTER-TRANSFERENCE
16 PHENOMENA.

17 Q IN ADDITION TO THE TRANSCRIPT OF THIS TRIAL,
18 THE DEPOSITIONS OF MR. MULL, YOU SAY YOU ALSO READ LETTERS
19 FROM MR. MULL TO CHURCH OFFICIALS?

20 A YES.

21 Q IN READING THE TRANSCRIPT, DEPOSITION, AND
22 THOSE LETTERS, WERE THEY CONSISTENT WITH RESPECT TO THE --
23 WITH RESPECT TO POSITIVE AND NEGATIVE TRANSFERENCE HAVING
24 OCCURRED?

25 A IN MY JUDGMENT, YES.

26 MR. KLEIN: THANK YOU.

27 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

28 MR. LEVY: THANK YOU, YOUR HONOR.

1 THE COURT: PLEASE PROCEED.

2

3

CROSS-EXAMINATION

4 BY MR. LEVY:

5 Q JUST BY WAY OF PRELIMINARIES, DOCTOR, IS IT
6 CUSTOMARY IN YOUR PROFESSION WHEN YOU COME ACROSS THE
7 COUNTRY TO GIVE TESTIMONY TO BE COMPENSATED WITH A
8 PROFESSIONAL FEE?

9 A I ALWAYS EXPECT THAT MY TIME BE PAID FOR.

10 Q THAT IS NOT UNUSUAL, IS IT?

11 A NO.

12 Q AMONG PROFESSIONALS WHO DO GIVE EXPERT
13 TESTIMONY?

14 A THAT'S RIGHT.

15 Q THAT WOULD BE A STANDARD NORMAL PROCEDURE,
16 WOULD IT NOT?

17 A YES. BECAUSE WHEN YOU ARE -- YOU HAVE A
18 PRIVATE PRACTICE, YOU LOSE A GREAT DEAL OF MONEY WHEN YOU
19 ARE AWAY. SO YOU ARE JUST COMPENSATED FOR YOUR TIME.

20 Q AND IN THIS PARTICULAR CASE, ARE YOU BEING
21 COMPENSATED FOR YOUR TIME?

22 A YES, I AM.

23 Q AND YOUR EXPENSES FOR COMING ACROSS THE COUNTRY
24 ARE BEING PAID FOR?

25 A YES, THAT'S CORRECT.

26 Q JUST BRIEFLY, COULD YOU TELL US WHAT YOUR FEES
27 ARE PER HOUR?

28 A \$100 PER HOUR.

1 Q DOES THAT INCLUDE YOUR RESEARCH TIME AND YOUR
2 TESTIMONY TIME?

3 A YES, IT DOES.

4 Q OKAY. I CAN'T HELP BUT BE CURIOUS AS TO YOUR
5 AGE, SIR.

6 A MY AGE?

7 Q YES, SIR.

8 A 43.

9 Q NOW, I TRIED TO ADD UP ALL OF THE THINGS THAT
10 YOU'VE BEEN DOING OVER THE YEARS. AND, BELIEVE IT OR NOT, I
11 CAME TO 167 YEARS. NOW, YOU HAVE BEEN A VERY BUSY
12 INDIVIDUAL.

13 A I SURE HAVE.

14 Q WE HAVE NOT INQUIRED WITH REGARD TO YOUR
15 UNDERGRADUATE WORK.

16 A YES.

17 Q HOW MANY YEARS DID YOU SPEND, SAY, AT THE
18 COLLEGE LEVEL AND AFTER YOU LEFT HIGH SCHOOL IN YOUR
19 UNDERGRADUATE WORK?

20 A FOUR YEARS.

21 Q SO ADDED TO THE REST OF IT, I HAVE NOW GOT 171
22 YEARS.

23 A I DON'T KNOW HOW YOU GOT THAT.

24 Q WELL --

25 A IT SEEMS LIKE THAT LONG. BUT IT WASN'T THAT
26 LONG.

27 Q WOULD I --

28 A I STARTED TO COLLEGE IN 1960. AND I FINISHED

1 MY PH.D. -- I WAS IN COLLEGE OR UNIVERSITY STUDIES
2 CONSISTENTLY THROUGH UNTIL 1979. AND EVEN SINCE 1979, I
3 HAVE BEEN DOING POSTDOCTORAL STUDIES. SO I AM A BIT OF A
4 WORKAHOLIC ON THAT.

5 Q NOW, YOU TOLD US YOU VISITED TEACHING CENTERS
6 FOR CHURCH UNIVERSAL AND TRIUMPHANT?

7 A YES, I DID.

8 Q HAVE YOU DONE ANY -- WHAT IS REFERRED -- BY THE
9 WAY, DO YOU KNOW WHAT EXIT COUNSELING IS?

10 A YES, I KNOW THE TERM.

11 Q AND WHAT IS EXIT COUNSELING?

12 A EXIT COUNSELING IS A TERM USED NOW TO
13 CHARACTERIZE COUNSELING DONE WITH PEOPLE THAT HAVE BEEN
14 INVOLVED IN MINORITY RELIGIONS WHO LEAVE. IT IS USED TO
15 DISTINGUISH THAT PROCESS FROM DEPROGRAMMING, WHICH IS A
16 TECHNIQUE WHICH USES PHYSICAL COERCION TO REMOVE A PERSON
17 FROM A GROUP. SO EXIT COUNSELING IS USED, I UNDERSTAND, TO
18 CHARACTERIZE PEOPLE WHO DO NOT USE THAT KIND OF COERCIVE
19 TECHNIQUE.

20 Q HAVE YOU EVER DONE ANY EXIT COUNSELING?

21 A YOU COULD CALL WHAT I DO WITH PEOPLE THAT HAVE
22 BEEN IN GROUPS EXIT COUNSELING. I NEVER CALL IT THAT. BUT
23 YOU -- ONE COULD USE THAT TERM.

24 Q WHAT DO YOU CALL IT?

25 A HUH?

26 Q WHAT IS IT THAT YOU CALL IT?

27 A WELL, I PRACTICE PSYCHOTHERAPY AND
28 PSYCHOANALYSIS. AND EXIT COUNSELING IS USUALLY USED BY

1799

1 PEOPLE WHO ARE EX-MEMBERS OR WHO ARE NOT PROFESSIONALS OF
2 SOME KIND.

3 I MEAN IT IS LIKE DEPROGRAMMING, YOU KNOW. TO
4 BE A DEPROGRAMMER, YOU DON'T HAVE TO HAVE ANY TRAINING. YOU
5 SORT OF DECLARE YOURSELF A DEPROGRAMMER AND THE SAME THING
6 IS TRUE OF EXIT COUNSELORS.

7 BUT YOU COULD CHARACTERIZE MY -- WHEN I WORK
8 WITH SOMEBODY THAT'S BEEN IN A GROUP, YOU COULD CALL IT -- I
9 WOULD NOT OBJECT TO CALLING IT EXIT COUNSELING.

10 Q OKAY. I DON'T WANT TO DO ANYTHING
11 OBJECTIONABLE. IF I HAVE OFFENDED YOU SO FAR, I APOLOGIZE.
12 I HAVE NOT INTENDED TO. WE JUST HAVE A DIFFERENCE OF
13 OPINION.

14 HAVE YOU WORKED DOING ANY OF THAT TYPE OF
15 COUNSELING WITH ANYONE WHO IS A FORMER MEMBER OF THIS
16 PARTICULAR CHURCH?

17 A NO, I HAVE NOT.

18 Q HAVE YOU DONE ANY COUNSELING WITH ANY PRESENT
19 MEMBERS OF THIS PARTICULAR CHURCH?

20 A NO, I HAVE NOT.

21 Q IN YOUR PROFESSIONAL CAPACITY?

22 A UNH-UNH.

23 Q I BELIEVE YOU HAVE TOLD US YOU OBSERVED THEM?

24 A YES.

25 Q KIND OF LIKE WHEN I WAS SITTING HERE AND
26 LOOKING AT YOU, I WAS OBSERVING YOU?

27 A SURE.

28 Q NOW, YOU TOLD US WAY BACK IN 1978, YOU WENT TO

1 A CONFERENCE. AND THAT CONFERENCE WAS OUT HERE ON THE WEST
2 COAST?

3 A YES, IT WAS.

4 Q AT THAT TIME THAT YOU WENT TO THE CONFERENCE,
5 DID YOU PAY FOR YOUR TRIP AND FEES FOR THE CONFERENCE?

6 A YES, I DID.

7 Q WERE THERE MEMBERS OF THE GENERAL PUBLIC AT
8 THAT CONFERENCE?

9 A I DON'T REALLY THINK SO. I THINK THERE MAY
10 HAVE BEEN PEOPLE WHO WERE NEWLY INVESTIGATING THE GROUP, YOU
11 KNOW, INTERESTED IN IT. BUT IF YOU MEAN BY THE GENERAL
12 PUBLIC YOU MEAN JUST SOMEBODY COMING IN OFF THE STREET --

13 Q I MEAN OTHER THAN AN ACTIVE PARTICIPATING
14 MEMBER OF THE CHURCH.

15 A THERE WERE PROBABLY PEOPLE THERE WHO HAD JUST
16 HEARD ABOUT IT FROM FRIENDS. ALTHOUGH I COULDN'T ANSWER.
17 THAT WOULD SIMPLY BE AN OPINION ABOUT THAT. MY GUESS IS
18 THAT BY FAR, THE GREAT MAJORITY OR ALMOST ALL THE PEOPLE
19 THAT WERE THERE WERE AFFILIATED IN SOME WAY WITH THE CHURCH.

20 Q BUT YOU DON'T KNOW FOR SURE, DO YOU?

21 A NO. I DIDN'T SEE ANY LIST OF, YOU KNOW, PEOPLE
22 THAT ATTENDED AND WHAT THEIR AFFILIATIONS WERE. I CAN JUST
23 GO BY -- THE PEOPLE THAT I TALKED TO WERE INVOLVED WITH THE
24 GROUP IN SOME WAY.

25 Q NOW, IN YOUR YEARS AND YEARS AND YEARS OF
26 EXPERIENCE, IF SOME GROUP WERE PUTTING ON A CONFERENCE WHERE
27 THERE MIGHT BE PEOPLE WHO WERE NONAFFILIATES AT THAT TIME,
28 IN YOUR PROFESSIONAL OPINION, WOULD IT BE A REASONABLE THING

1 TO -- OR RATHER FOR THAT GROUP TO PUT THEIR BEST FOOT
2 FORWARD?

3 A YOU MEAN -- YOU MEAN IF THEY THOUGHT SOMEBODY
4 MIGHT BE THERE FROM -- WHO WASN'T A MEMBER OF THE GROUP,
5 THAT THEY MIGHT WANT TO LOOK GOOD? SURE. SURE.

6 Q PEOPLE DO THAT ALL THE TIME?

7 A THAT'S RIGHT. SURE.

8 Q YOU PUT YOUR BEST FOOT FORWARD TODAY?

9 A EVERYBODY DOES.

10 THE COURT: I THINK THIS IS A CONVENIENT TIME TO
11 STOP.

12 THIS AFTERNOON, I HAVE A HEARING HERE AT 1:30
13 IN ANOTHER CASE THAT HAS NOTHING TO DO WITH THIS CASE. IT
14 IS GOING TO TAKE JUST A LITTLE BIT OF TIME. SO
15 REALISTICALLY, WE WILL RESUME AT TWO O'CLOCK.

16 I AM SORRY FOR THE DELAY, BUT I DO HAVE TO TAKE
17 CARE OF THE OTHER BUSINESS HERE. AND YOU ARE ON YOUR OWN
18 UNTIL TWO O'CLOCK. WE WILL RESUME THEN.

19 (AT 11:58 A.M., A RECESS WAS TAKEN UNTIL
20 2:00 P.M. OF THE SAME DAY.)

21

22

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28

1 LOS ANGELES, CALIFORNIA; THURSDAY, MARCH 6, 1986

2 2:35 P.M.

3 DEPARTMENT NO. 50 HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS NOTED ON TITLE PAGE.)

5
6 THE COURT: I AM SORRY FOR THE DELAY. LIKE MANY
7 THINGS, IT JUST TOOK LONGER THAN WE EXPECTED. AND THERE WAS
8 A DELAY IN ONE OF THE PERSONS GETTING HERE WHOSE PRESENCE
9 WAS REQUIRED FOR THAT HEARING. BUT WE ARE READY TO GET
10 UNDERWAY NOW.

11
12 ROBERT L. MOORE,

13 RESUMED THE STAND AND TESTIFIED FURTHER AS FOLLOWS:

14 THE CLERK: SIR, YOU PREVIOUSLY HAVE BEEN SWORN AND
15 ARE STILL UNDER OATH. PLEASE STATE YOUR NAME AGAIN FOR THE
16 RECORD.

17 THE WITNESS: ROBERT L. MOORE, M-O-O-R-E.

18 THE CLERK: THANK YOU.

19 MR. LEVY: THANK YOU, YOUR HONOR.

20
21 CROSS-EXAMINATION (RESUMED)

22 BY MR. LEVY:

23 Q DR. MOORE, BEFORE WE WENT TO LUNCH, YOU HAD
24 TESTIFIED THAT YOU HAD NOT COUNSELED WITH, IN A PROFESSIONAL
25 CAPACITY, ANY EX-MEMBERS OF THIS PARTICULAR CHURCH, CHURCH
26 UNIVERSAL AND TRIUMPHANT; IS THAT CORRECT?

27 A THAT'S CORRECT, YES.

28 Q AND THAT YOU HAD NOT COUNSELED WITH ANY PRESENT

1 MEMBERS OF THE CHURCH; IS THAT CORRECT?

2 A THAT'S CORRECT.

3 Q I WAS RATHER IMPRESSED WITH YOUR TIME AT THE
4 CONFERENCE THAT YOU ATTENDED. THAT WAS BACK IN 1978, WAS
5 IT?

6 A THAT'S CORRECT.

7 Q YOU WERE THERE A TOTAL OF ONE WEEK?

8 A YES.

9 Q NOW, COULD YOU TELL US APPROXIMATELY WHAT IT
10 WAS THAT YOU DID DURING THE COURSE OF THE AVERAGE DAY AT
11 THAT CONFERENCE?

12 A ALL RIGHT. WELL, GET UP FAIRLY EARLY IN THE
13 MORNING, HAVE BREAKFAST, GO TO LECTURES, GO TO DECREERING
14 SESSIONS, HAVE LUNCH, REPEAT IN THE AFTERNOON. THERE WAS IN
15 THE EARLY EVENING WHAT THEY CALLED A MYSTERY PLAY, WHICH WAS
16 KIND OF A RELIGIOUS DRAMA LIKE YOU MAY HAVE SEEN IN OTHER
17 SETTINGS. CEREMONIES OUTSIDE AT NIGHT AND THEN GO TO BED
18 10:00, ELEVEN O'CLOCK P.M., REST FOR THE NEXT DAY.

19 THAT WOULD BE A TYPICAL DAY. LECTURES,
20 DECREERING, MEALS, SOME FREE TIME AND THEN SOME SPECIAL DRAMA
21 OR GATHERING AROUND THE LAKE OR SOMETHING IN THE EVENING.

22 Q WOULD IT BE A FAIR STATEMENT TO SAY THAT THIS
23 SEVEN DAYS WERE APPROXIMATELY A REPETITION OF THAT DAY YOU
24 JUST DESCRIBED?

25 A THAT IS MY MEMORY OF IT, YES.

26 Q I WAS IMPRESSED BECAUSE YOU TOLD US YOU HAD
27 DONE IN-DEPTH INTERVIEWING WITH SOME 50 PEOPLE?

28 A YES.

1 Q WHEN WAS IT YOU DID THE IN-DEPTH INTERVIEWING?
2 YOU'VE JUST DESCRIBED A DAY THAT STARTED EARLY IN THE
3 MORNING AND WENT TO ABOUT ELEVEN O'CLOCK AT NIGHT. WAS YOUR
4 IN-DEPTH INTERVIEWS SOMETIME AFTER 11:00 AT NIGHT?

5 A I TALKED WITH SOME PEOPLE LATE IN THE EVENING,
6 I TALKED WITH SOME DURING MEAL -- I TALKED WITH A LOT OF
7 PEOPLE DURING MEALS, YOU KNOW, DURING EATING TOGETHER. AND
8 THERE WAS A GOOD DEAL OF BREAK TIME BETWEEN THE FORMAL
9 EVENTS IN WHICH PEOPLE SAT AROUND AND COULD TALK. AND I
10 COULD MOVE AROUND FREELY DURING THOSE TIMES.

11 BUT I USUALLY WOULD SIT WITH DIFFERENT PEOPLE
12 AT EACH MEAL AND TALK WITH THEM IN SOME DEPTH AT EACH MEAL.

13 Q YOU TALKED WITH THEM AT SOME DEPTH AT EACH
14 MEAL?

15 A YES.

16 Q WOULD IT BE FAIR TO SAY THAT IF YOU SAW 50 OF
17 THEM DURING THE WEEK WITH THE SCHEDULE YOU HAD, YOU WOULD
18 HAVE BEEN HARD-PRESSED TO SPEND A HALF HOUR WITH EACH OF THE
19 50?

20 A NO. I SPENT MORE THAN THAT WITH EACH OF THE
21 50. I WOULD IMAGINE THAT I WOULD HAVE HAD MORE LIKE A
22 COUPLE OF HOURS WITH EACH PERSON.

23 Q SO IN THE COURSE OF THAT ONE WEEK THAT YOU WERE
24 THERE, THOSE 50 PLUS PEOPLE YOU SPENT AT LEAST A HUNDRED
25 HOURS IN IN-DEPTH INTERVIEWING?

26 A IN-DEPTH DISCUSSIONS, YES.

27 Q THE BOOK THAT WE DISCUSSED THAT YOU
28 CO-AUTHORED, I NOTED DURING LUNCH YOU HAD THE BOOK ON THE

1 TABLE IN THE CAFETERIA. DO YOU KNOW WHERE THE PRESENCE OF
2 THE BOOK IS NOW?

3 A I DO NOT, NO.

4 Q THAT WAS MR. KLEIN'S COPY OF THE BOOK?

5 A I ASSUME, YES.

6 MR. LEVY: WOULD IT BE POSSIBLE THAT MR. KLEIN WOULD
7 HAVE THAT BOOK WITH HIM NOW?

8 MR. KLEIN: I DON'T HAVE THE BOOK WITH ME NOW.
9 SORRY.

10 THE COURT: YOU DON'T HAVE IT?

11 MR. KLEIN: NO, I DON'T HAVE IT. MR. LEVY HAS KNOWN
12 FOR A YEAR ABOUT THIS WITNESS. IF HE WANTED THE BOOK, HE
13 COULD HAVE GOTTEN IT.

14 MR. LEVY: OH, I HAVE READ THE BOOK, MR. KLEIN.

15 Q WITH REGARD TO THE PORTION OF YOUR BOOK THAT
16 TALKS ABOUT "SNAPPING"?

17 A YES.

18 Q BY THE WAY, THAT BOOK OF YOURS, THAT WAS
19 WRITTEN FOR THE COMMERCIAL PRESS, IT WAS NOT WRITTEN AS A
20 SCHOLARLY JOURNAL THAT WAS ACCEPTED BY ANY MEDICAL OR --

21 A SAY THAT AGAIN.

22 Q I SAY THE BOOK THAT YOU WROTE, THAT WAS WRITTEN
23 FOR THE COMMERCIAL PRESS, WAS IT NOT, AS OPPOSED TO A
24 JOURNAL THAT WAS ACCEPTED BY ANY SCHOLARLY ORGANIZATION OR
25 ANY BRANCH OF MEDICAL SCIENCE; IS THAT CORRECT?

26 A IT WAS WRITTEN AS A PUBLIC EDUCATION PIECE FOR
27 THE PURPOSE OF PUBLIC EDUCATION, YES. IT WASN'T DIRECTED AT
28 A NARROW SCHOLARLY AUDIENCE, NO. IT WAS DIRECTED AT THE

1 AVERAGE CITIZEN.

2 Q NOW, WITH REGARD TO THAT PORTION OF YOUR BOOK
3 THAT DEALS WITH THE TERM SNAPPING --

4 A YES.

5 Q COULD YOU TELL US WHAT SNAPPING, AS IT'S
6 WRITTEN ABOUT IN YOUR BOOK, ACTUALLY MEANS?

7 A WELL, IT IS A RESPONSE TO A BOOK THAT WAS --
8 THAT WAS VERY INFLUENTIAL AND ENTITLED JUST THAT,
9 "SNAPPING." AND IT CHARACTERIZED WHAT WAS CALLED SUDDEN
10 PERSONALITY CHANGE.

11 AND IT HAD A VIEW OF HUMAN PERSONALITY THAT
12 HUMAN PERSONALITIES, WHEN THEY ENGAGE IN RELIGIOUS
13 PRACTICES, SNAP OR SUDDENLY CHANGES IN SOME INEXPLICABLE
14 PATHOLOGICAL WAY. AND IN ANY KIND OF RELIGIOUS EXPERIENCE
15 WAS VIEWED AS SORT OF THE FAILURE OF THE MENTAL APPARATUS.

16 AND THAT KIND OF VIEW OF RELIGIOUS CONVERSION
17 IS NOT A VIEW THAT IS SHARED WITH ANYONE WHO IS A SCHOLAR OF
18 RELIGION AND OF THE NATURE OF THE PSYCHOLOGY OF CONVERSION.
19 AND SO IT WAS IMPORTANT, I FELT, TO -- FOR US TO ADDRESS
20 THIS KIND OF PSEUDOSCIENTIFIC TREATMENT OF RELIGIOUS
21 EXPERIENCE.

22 AND SO THE WORD SNAPPING WAS NOT MY TERM, BUT A
23 TERM THAT I WISHED TO INTERPRET FOR THE PUBLIC.

24 Q AND THAT PUBLICATION THAT TALKED ABOUT
25 SNAPPING, THAT WAS PSEUDOSCIENTIFIC?

26 A MY SENSE OF THE WAY IN WHICH RELIGIOUS
27 CONVERSION WAS TALKED ABOUT WAS PRESENTED AS IF IT WERE
28 SCIENCE WHEN IN FACT THE SCIENTIFIC STUDIES OF THE

1 PSYCHOLOGY OF CONVERSION THAT EXIST IN THE LITERATURE DO NOT
2 HAVE ANY SUCH INTERPRETATION OF CONVERSION EXPERIENCES.

3 NO -- THERE ARE NO MAJOR PSYCHOLOGISTS OF
4 RELIGION THAT VIEW CONVERSION EXPERIENCES AS BEING A
5 REFLECTION OF A PATHOLOGICAL SNAPPING OF THE HUMAN
6 PERSONALITY.

7 Q WOULD YOU SAY THAT THAT BRANCH OF SCIENCE,
8 PSYCHOLOGY OF RELIGION, IS PROBABLY ONE OF THE MORE
9 DEMINIMUS BRANCHES WITH REGARD TO THE TOTAL FIELD OF
10 PSYCHOLOGY?

11 A ONE OF THE MORE WHAT KIND OF BRANCHES?

12 Q SMALLER PARTS. IT IS NOT THE LARGEST PART OF
13 THE STUDY OF PSYCHOLOGY CERTAINLY, IS IT?

14 A IT IS ONE SUBJECT FIELD WITHIN PSYCHOLOGY
15 TODAY.

16 Q NOW, HYPOTHETICALLY, WE HAVE HEARD OF SOME
17 RELIGIOUS CONVERSIONS IN THE PAST LIKE DIFFERENT MIRACLES
18 THAT HAVE TAKEN PLACE IN DIFFERENT CHURCHES.

19 LIKE, SAY, IF ELIZABETH CLARE PROPHET WERE TO
20 LEVITATE UP TO THE CEILING, SOME PEOPLE MIGHT BELIEVE THAT
21 IS A MIRACLE. AND SOME PEOPLE MIGHT AT THAT MOMENT, AS THAT
22 BOOK SAYS, SNAP AND BE SO IMPRESSED WITH THAT SPECTACLE THAT
23 THEY HAVE SEEN THAT THEY MIGHT IMMEDIATELY CONVERT AND
24 BECOME A FOLLOWER OF HERS.

25 WOULD THAT BE AN APT DESCRIPTION OF WHAT
26 SNAPPING REALLY IS ABOUT?

27 A WELL, THAT I DON'T EVEN THINK RELATES TO WHAT
28 THE TERM CONVERSION USUALLY --

1 Q THE TERM SNAPPING.

2 A THE TERM SNAPPING IS A TERM WHICH IS USED BY
3 CONWAY AND SIEGELMAN TO CHARACTERIZE ANY KIND OF RELIGIOUS
4 CONVERSION EXPERIENCE WHETHER IT IS BY A BAPTIST OR BY A
5 MOONIE OR BY WHOEVER.

6 AND THEIR CHARACTERIZATION IS THAT A PERSON,
7 WHEN THEY HAVE A RELIGIOUS EXPERIENCE OF SOME KIND, JUST
8 THEIR MENTAL APPARATUS FAILS AND THEY SNAP. ALL I AM SAYING
9 IS THAT THOSE OF US WHO ARE SPECIALISTS IN THE PSYCHOLOGY OF
10 RELIGION, WE NEVER USE SUCH A TERM AS SNAPPING BECAUSE WE DO
11 NOT THINK PSYCHE SNAP IN THAT WAY.

12 THERE IS A LONG DISCUSSION IN MY BOOK ABOUT THE
13 PHENOMENOLOGY OF TRANSITION STATES THAT ARE CHARACTERISTIC
14 OF LIMINAL PHASES IN PEOPLE'S LIVES BY WHICH IT SIMPLY MEANS
15 PHASES IN PEOPLE'S LIVES WHEN THEY UNDERGO LARGE CHANGES.

16 SO THERE IS NO QUESTION THAT THERE ARE PHASES
17 IN PEOPLE'S LIVES WHEN THEY HAVE LARGE ALTERATIONS. FOR
18 EXAMPLE, THE SO-CALLED MID-LIFE CRISIS.

19 Q EXCUSE ME, SIR. I APPRECIATE ALL THAT
20 INFORMATION, BUT I THINK YOU HAVE GONE A LITTLE BIT FAR
21 AFIELD FROM SNAPPING. AND I KNOW THE JUDGE IS GOING TO TELL
22 ME TO ASK YOU ANOTHER QUESTION ABOUT IT.

23 THE COURT: RIGHT.

24 Q BY MR. LEVY: YOU TOLD US THAT YOUR STUDY OF
25 THE NEW WAVE RELIGION INCLUDED 12 GROUPS?

26 A YES.

27 Q WOULD YOU TELL US WHICH 12 GROUPS YOU STUDIED?

28 A YES, I WILL BE HAPPY TO LIST THEM FOR YOU. ZEN

1 BUDDHISM, I.S.K.O.N., WHICH IS BETTER KNOWN TO PEOPLE AS THE
2 INTERNATIONAL SOCIETY FOR CHRISTIAN CONSCIOUSNESS OR THE
3 HARE KRISHNA PEOPLE, W.I.C.C.A., WHICH IS A RELIGION --

4 Q WHY DON'T YOU -- EXCUSE ME, BUT WOULD YOU JUST
5 LIST THEM?

6 A JUST NAME THEM. OKAY.

7 UNIFICATION, SCIENTOLOGY, THE WAY
8 INTERNATIONAL, TRANSCENDENTAL MEDITATION, SUFISM, THE DIVINE
9 LIGHT MISSION, NICHIREN SHOSHU OF AMERICA, WHICH IS A
10 BUDDHIST GROUP, JESUS PEOPLE U.S.A., AND THE HIMALAYAN
11 INSTITUTE.

12 IN OUR BOOK --

13 Q EXCUSE ME. THERE IS NO QUESTION PENDING. IF
14 YOU WILL GIVE ME A CHANCE TO ASK THEM, I WILL GIVE YOU A
15 CHANCE TO ANSWER THEM.

16 A OKAY.

17 Q I ASSUME AS A METHODIST MINISTER, YOU HAVE HAD
18 AN OPPORTUNITY TO STUDY SOME OF THE MAIN LINE RELIGIONS
19 ALSO?

20 A YES, I HAVE.

21 Q THIS GROUP OF NEW WAVE RELIGIONS THAT YOU
22 STUDIED, WOULD YOU PLACE THEM IN A POSITION OF RELIGIOUS
23 EQUALITY -- STRIKE THAT. LET ME REPHRASE THAT IF I CAN.

24 WHAT I WANT TO KNOW IF YOU SEE THEM ALL EQUALLY
25 ALIKE -- METHODIST RELIGION, MORMON RELIGION, JEWISH
26 RELIGION, BUDDHIST RELIGION, ISLAMIC RELIGIONS, AND THEN
27 THIS LIST?

28 YOU MADE AN ANALOGY BEFORE ABOUT PROGRAMING AND

1 THE CATHOLIC CHURCH. AND I WONDER IF YOU WOULD CLASSIFY ALL
2 OF THESE GROUPS AND -- IN OUR SOCIAL STRUCTURE AS BEING
3 EQUALLY ACCEPTED?

4 MR. KLEIN: I AM GOING TO OBJECT AS TO COMPOUND AND
5 VAGUE AND AMBIGUOUS.

6 THE COURT: HE CAN ANSWER.

7 THE WITNESS: WELL, THEY ARE NOT AT ALL ALIKE A LOT
8 OF THEM IN TERMS OF PRACTICES OR BELIEFS. THEIR BELIEFS ARE
9 VERY, VERY DIFFERENT MANY OF THEM. I MEAN THERE IS --

10 Q BY MR. LEVY: EXCUSE ME, SIR. I REALIZE THAT
11 THEY ARE NOT ALIKE.

12 A I THOUGHT YOU WERE ASKING ME IF I SAW THEM AS
13 BEING ALIKE.

14 Q AND YOU TELL ME THAT THEY ARE NOT AT ALL ALIKE;
15 IS THAT CORRECT?

16 A THEY ARE VERY -- VERY MUCH DIFFERS IT BETWEEN
17 THEM. THAT IS ONE OF THE TROUBLES THAT PEOPLE HAVE WHEN
18 THEY SPEAK OF MINORITY RELIGIOUS GROUPS IS THEY ASSUME THAT
19 THERE IS A LOT OF, YOU KNOW, THAT THEY ARE ALL ALIKE. AND
20 THEY ARE VERY DIFFERENT.

21 Q NOW, THE ONE YOU LEFT OUT OF THAT GROUP, YOU
22 TOLD US YOU ALSO STUDIED THIS CHURCH, CHURCH UNIVERSAL AND
23 TRIUMPHANT?

24 A YES.

25 Q DID YOU EVER STUDY ANYTHING ABOUT JIM JONES AND
26 THAT RELIGION?

27 A I AM FAMILIAR WITH THE DENOMINATION THAT HE WAS
28 A PART OF AND WITH THE PHENOMENA.

1 Q NOW, WHEN WE WERE TALKING ABOUT MR. MULL AND
2 THE THINGS THAT YOU HAD DONE TO PREPARE YOURSELF, YOU
3 MENTIONED LETTERS ANY NUMBER OF TIMES. AND I BELIEVE YOU
4 CAME TO THE CONCLUSION THAT IN READING THOSE LETTERS, YOU
5 HAD DETERMINED THAT MR. MULL IN ALL PROBABILITY HAD
6 IDEALIZED ELIZABETH CLARE PROPHET.

7 WOULD THAT BE A FAIR STATEMENT?

8 A THAT WOULD BE FAIR THAT THAT WOULD BE A
9 JUDGMENT THAT I WOULD HAVE COME TO ON THE BASIS OF THE
10 LETTERS BASICALLY.

11 Q OKAY. THEN LET ME ASK YOU THIS: IN YOUR
12 PROFESSIONAL OPINION, DO YOU THINK IF A PERSON IDEALIZES
13 ANOTHER, THAT THAT FIGURE THAT IS IDEALIZED, IF THEY SO
14 CHOOSE, AND PLACED THEMSELVES IN A POSITION WHERE THEY CAN
15 UTILIZE UNDO INFLUENCE ON THE ONE THAT IS DOING THE
16 IDOLIZATION --

17 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
18 AMBIGUOUS AS TO "UNDO INFLUENCE," YOUR HONOR.

19 THE COURT: MAYBE YOU CAN REWORD IT.

20 Q BY MR. LEVY: YOU'VE TOLD ME A NUMBER OF TIMES
21 ABOUT YOUR SCHOLARLY PURSUITS. NOW, IF I WERE TO IDEALIZE
22 YOU AS A SCHOLAR AND I WERE TO DETERMINE THAT I NEEDED SOME
23 INFORMATION ABOUT SOMETHING AND I WERE TO BE IN THE THROES
24 OF MAKING A DECISION PREDICATED ON MY IDOLATRY FOR YOU,
25 MIGHT YOU BE IN A POSITION TO UNDULY INFLUENCE ME WITH
26 REGARD TO MAKING THAT DECISION IF YOU SO CHOSE?

27 A I THINK THE MORE YOU IDEALIZE ME, THE VERY
28 PROBABLY THE MORE INFLUENCE I MIGHT HAVE ON YOU.

1 Q SO IT WOULD FOLLOW THEN, WOULD IT NOT, IF MR.
2 MULL HAD THAT GREAT DEGREE OF REGARD FOR ELIZABETH CLARE
3 PROPHET, IT WOULD BE A PRETTY GOOD BET THAT IF SHE GAVE HIM
4 AN INSTRUCTION, AND IT WAS NOT A LIFE-THREATENING
5 INSTRUCTION, THAT THE PROBABILITIES ARE THAT WHAT HE WOULD
6 HAVE DONE WAS OBEY THAT INSTRUCTION?

7 A ONE OF THE THINGS THAT IS TRUE ABOUT PEOPLE IN
8 GENERAL IS THE MORE THEY IDEALIZE ANYONE THAT THEY ARE IN
9 INTIMATE OR CLOSE RELATIONSHIP WITH, THEN THERE IS -- YOU
10 KNOW, I SAID EARLIER THAT THERE IS RELATIVE DEGREES OF
11 INFLUENCE. I WOULD SAY THAT THIS WOULD BE TENDENCY TO HAVE
12 MORE INFLUENCE.

13 THE COURT: THAT MEANS THE ANSWER IS YES?

14 THE WITNESS: YES.

15 MR. LEVY: SCHOLARS, LIKE ATTORNEYS, YOUR HONOR,
16 GENERALLY GET PAID BY THE WORD.

17 Q SO WE DO TALK A LOT, DON'T WE, SIR?

18 A WE ARE USED TO LECTURING.

19 Q IF I CUT YOU OFF, I AM NOT TRYING TO BE RUDE.

20 YOU ALSO MADE MENTION OF THE MILITARY AND
21 INDOCTRINATION. DO YOU SEE GOING THROUGH BOOT CAMP AS SOME
22 KIND OF INDOCTRINATION PROGRAM?

23 A I SEE IT AS VERY HIGHLY INFLUENTIAL ON THE
24 BEHAVIOR AND THOUGHT OF RECRUITS. I WOULD NOT CONSIDER IT A
25 THOUGHT REFORM PROGRAM OR COERCIVE PERSUASION PERSONALLY.
26 BUT IF I APPLIED THE CRITERIA THAT WERE REFERRED TO EARLIER,
27 YOU WOULD HAVE TO INCLUDE THAT UNDER THOSE CRITERION.

28 Q FORGIVE ME, I FORGOT. I BELIEVE I DID ASK YOU

1 BEFORE WHETHER YOU WERE IN THE MILITARY OR NOT?

2 A NO, I HAVE NEVER BEEN IN THE MILITARY.

3 Q SO YOU HAVE NEVER EXPERIENCED BOOT CAMP?

4 A NOT PERSONALLY.

5 Q WELL, LET ME ASK YOU THIS: IN ALL OF YOUR
6 READING AND YOUR SCHOLARLY PURSUITS, HAVE YOU EVER READ THAT
7 SOMETIMES IN BOOT CAMP, IF A RAW RECRUIT IS A LITTLE BIT
8 UNREASONABLE, HE MAY END UP PEELING POTATOES FOR HOURS ON
9 END; AND IF HE CHOSE NOT TO HAVE TO DO THAT, HE MIGHT
10 CONFORM TO THE THOUGHTS OF SOMEONE ELSE?

11 WOULD THAT BE A FAIR STATEMENT?

12 A UH-HUH.

13 Q AND IF HE WERE CONFORMING TO THE THOUGHTS OF
14 SOMEONE ELSE, WOULD IT NOT BE ACCURATE TO SAY THAT THERE WAS
15 A BIT OF COERCION IN THE SUGGESTION BY HIS SUPERIOR THAT,
16 "YOU CONFORM OR ELSE"?

17 A OH, YES. A BIT. BIT OF COERCION AND
18 INFLUENCE, YES.

19 Q THEN THAT WOULD BE ONE OF THOSE DEGREES OF
20 COERCIVE PERSUASION WE WERE TALKING ABOUT BEFORE?

21 A WELL, IF -- IT WOULD BE A DEGREE OF INFLUENCE.
22 BUT THE USE OF THE WORD "COERCIVE PERSUASION" TENDS TO BE
23 USED TOTALISTICALLY. I WOULDN'T USE IT IN THAT CASE EITHER.

24 Q WHAT WE HAVE THEN IS AN ARGUMENT IN SEMANTICS,
25 WOULDN'T YOU AGREE?

26 A ALL TESTIMONY IS SEMANTICS.

27 Q AND IF THE SERGEANT SAID, "SCRUB THE FLOOR WITH
28 YOUR TOOTHBRUSH OR ELSE YOU ARE GOING TO END UP CLEANING THE

1 POTATOES," AND THE RECRUIT GOT DOWN THERE AND SCRUBBED THE
2 CRACKS IN THE FLOOR WITH HIS TOOTHBRUSH, HE WOULD COMPLY,
3 WOULD HE NOT, AND HE WOULD HAVE BEEN PERSUADED, WOULD HE
4 NOT?

5 A RIGHT. BUT IT WOULD NOT BE THOUGHT REFORM.

6 Q I SEE. THE RECRUIT WOULD HAVE THE FREE CHOICE
7 OF EITHER SCRUBBING OR CLEANING THE POTATOES?

8 A UH-HUH. AND SOME REFUSE AND SOME GO TO THE
9 GUARD HOUSE.

10 Q AND SOME COMPLY AND ARE PERSUADED?

11 A UH-HUH.

12 Q NOW, LET'S EQUATE THAT WITH THIS CHURCH WE ARE
13 TALKING ABOUT. WE HAVE HEARD THAT THERE IS NOBODY STANDING
14 THERE WITH A GUN, AND SOME PEOPLE CAN LEAVE AND CERTAINLY
15 SOME PEOPLE DO.

16 IF SOMEONE DID NOT LEAVE AND ACCEPTED THE
17 PERSUASION, WOULD IT NOT BE ACCURATE TO SAY THAT EVEN THOUGH
18 IT WAS APPARENTLY THEIR FREE CHOICE, THEY WERE STILL THE
19 VICTIM OF PERSUASION IN SOME DEGREE?

20 A THEY WOULD HAVE BEEN PERSUADED IN SOME DEGREE,
21 THAT'S CORRECT, SIR.

22 Q NOW, YOU TELL US YOU ARE COUNSELING FOR --
23 STRIKE THAT.

24 DO YOU USE HYPNOTISM IN YOUR PRACTICE?

25 A I AM NOT A HYPNOTIST, NO.

26 Q DO YOU -- IN THE COURSE OF YOUR STUDY AS A
27 PSYCHOLOGIST, CERTAINLY YOU HAVE STUDIED HYPNOTISM?

28 A YES.

1 Q IS THERE ANYTHING MYSTERIOUS ABOUT HYPNOTISM?

2 A I DON'T PERSONALLY THINK SO.

3 Q ARE YOU FAMILIAR WITH MASS HYPNOSIS TECHNIQUES?

4 A SOMEWHAT.

5 Q IS IT POSSIBLE IF WE HAD SOMEONE WHO WAS VERY
6 PROFICIENT SITTING WHERE YOU ARE SITTING, IF THEY SO CHOSE
7 AND THEY WERE GIVEN THE TOTAL FREEDOM TO DOMINATE THIS GROUP
8 TIME WISE, THAT IF THEY WERE KNOWLEDGEABLE ABOUT HYPNOTISM,
9 THEY MIGHT HAVE AN AFFECT ON THE SUGGESTIBILITY OF THE
10 AUDIENCE?

11 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
12 AMBIGUOUS AS TO THE LAST PART OF IT.

13 MR. LEVY: THIS IS A PROFESSIONAL PSYCHOLOGIST.

14 THE COURT: HE CAN ANSWER.

15 MR. KLEIN: JUST "IT MIGHT HAVE AN AFFECT" IS VAGUE
16 AND AMBIGUOUS, YOUR HONOR.

17 THE COURT: HE CAN ANSWER.

18 THE WITNESS: THE PLACES THAT I HAVE SEEN HYPNOSIS
19 WORK HAS BEEN IN ONE TO ONE SITUATIONS. I HAVE HEARD
20 ACCOUNTS OF MASS HYPNOSIS OR SORT OF GROUP HYPNOSIS. I HAVE
21 NEVER PERSONALLY OBSERVED ANY SUCH PHENOMENON. I KNOW THERE
22 ARE PEOPLE THAT WOULD AGREE THAT SUCH AS THE THING YOU SAY
23 MIGHT BE THE CASE.

24 Q BY MR. LEVY: YOU EVER HEARD -- THERE IS A
25 HYPNOTIST I THINK CALLED PAT COLLINS. HAVE YOU EVER SEEN
26 HER?

27 A NEVER.

28 Q WELL, SHE IS A WEST COAST PHENOMENON.

1 YOU HAVE SEEN PEOPLE IN THE MINISTRY THOUGH
2 WHO HAVE BEEN SAID -- AND I USE THIS WORD A LITTLE BIT
3 LOOSELY -- TO HAVE MESMERIZED THEIR AUDIENCE WITH THE POWER
4 OF THEIR SERMON, HAVE YOU NOT?

5 A I'VE HEARD OF PREACHERS THAT HAVE ALLEGEDLY
6 WERE VERY GOOD AT INFLUENCING AUDIENCES. JONATHAN EDWARDS.

7 Q IN THE COURSE OF ALL YOUR READING AND YOUR
8 SCHOLARLY PURSUITS, WOULD IT BE POSSIBLE FOR A PERSON TO BE
9 IN THE CIRCUMSTANCES THAT YOU'VE READ ABOUT IN THE
10 DEPOSITIONS AND THE TESTIMONY AND THE LETTERS TO HAVE
11 FOLLOWED THE DICTATES OF SOMEONE HE IDOLIZED TO HIS OWN
12 DETRIMENT?

13 A THAT WOULD BE POSSIBLE.

14 Q WELL, ONE THING I AM CURIOUS ABOUT. WHEN YOU
15 WERE OUT AT THE CONFERENCE AND YOU WENT TO CAMELOT, YOU SAID
16 YOU DID NOT MEET ELIZABETH CLARE PROPHET?

17 A I WAS NOT INTRODUCED TO HER.

18 Q AND YET YOU KNEW THE PEOPLE AT THE TEACHING
19 CENTER BACK IN CHICAGO?

20 A YES.

21 Q WAS THERE SOME REASON THAT YOU KNOW OF WHY YOU
22 FAILED TO MEET WITH THE LEADER OF THIS CHURCH YOU WERE
23 STUDYING?

24 A WELL, I DID NOT ASK ANYONE TO INTRODUCE ME. MY
25 HOPE WAS TO MAINTAIN A LOW PROFILE SO THAT I WOULD BE ABLE
26 TO TALK -- WHAT I WAS REALLY INTERESTED IN WAS NOT THE
27 LEADERSHIP BUT THE MEMBERSHIP. AND MY GOAL WAS TO MAINTAIN
28 AS LOW A PROFILE AS POSSIBLE SO THAT I COULD TALK WITH JUST

1 ORDINARY MEMBERS.

2 Q YOU INTERVIEWED 50 OR MORE OF THEM IN-DEPTH.
3 DID YOU SOMEHOW OR OTHER THINK THAT THIS WAS NOT GOING TO BE
4 NOTICED BY THE GROUP OR --

5 A WELL, I WASN'T PARTICULARLY CONCERNED ABOUT IT.
6 BUT THAT MY GOAL WAS TO -- WAS TO TALK WITH ORDINARY PEOPLE.
7 AND IT HAPPENED AT THIS GATHERING THAT THERE WERE PEOPLE
8 COMING THERE FROM MANY, MANY PLACES AROUND THE COUNTRY.

9 Q IN THE COURSE OF STUDYING A RELIGION, WHEN YOU
10 HAVE THE OPPORTUNITY TO MEET ONE OF THE LEADERS OF ONE OF
11 THOSE NEW WAVE RELIGIONS, ARE YOU USUALLY QUITE SO
12 CONSERVATIVE AND DO YOU USUALLY ATTEMPT TO AVOID AN
13 INTRODUCTION?

14 A I HAVE MET LEADERS OF OTHER GROUPS AND IN
15 SUBSEQUENT FIELD WORK. I JUST DID NOT -- AT THAT PARTICULAR
16 TIME, THAT WAS PRETTY EARLY IN MY FIELD WORK. I JUST WAS
17 INTERESTED IN THE FOLLOWERS.

18 BECAUSE IF YOU ARE A MEMBER -- I WAS INTERESTED
19 IN EFFECTS ON THE FOLLOWERS, THE EFFECTS ON THE DEVOTEES. I
20 WAS NOT PARTICULARLY INTERESTED IN THE PERSONALITIES OF THE
21 LEADERSHIP. I WAS MORE INTERESTED IN WHAT WAS HAPPENING TO
22 PEOPLE WHO WERE MEMBERS OF THE GROUP.

23 SO THAT IS -- I MEAN I MIGHT DO IT DIFFERENTLY
24 TODAY. BUT IN THOSE DAYS, THAT IS WHAT I WAS THINKING.

25 Q JUST ONE MORE QUESTION WITH REGARD TO THE
26 LETTERS.

27 DO YOU THINK IF -- NOW, I AM NOT A PSYCHOLOGIST
28 AND I HAVE READ AN AWFUL LOT OF THINGS. BUT BECAUSE I HAVE

1 READ THEM, I DON'T HOLD MYSELF OUT TO HAVING ANY GREAT
2 EXPERTISE.

3 IF I WERE TO HAVE READ THOSE LETTERS, WOULD I
4 HAVE BEEN ABLE TO DETERMINE MR. MULL IDOLIZED ELIZABETH
5 CLARE PROPHET?

6 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THAT
7 CALLS FOR SPECULATION ON THE PART OF THIS WITNESS AS TO WHAT
8 MR. LEVY COULD TELL.

9 THE COURT: SUSTAINED.

10 Q BY MR. LEVY: WOULD A PERSON WITHOUT
11 PSYCHOLOGICAL TRAINING BE ABLE TO MAKE OR COME TO THE SAME
12 CONCLUSION IF THEY WERE TO READ THOSE LETTERS?

13 A I THINK A PERSON WITHOUT SOME PSYCHOANALYTIC
14 TRAINING WOULD NOT HAVE AN UNDERSTANDING OF WHAT CONSTITUTES
15 AN IDEALIZING TRANSFERENCE. SO IT MIGHT BE VERY DIFFICULT
16 FOR THEM TO DO SO.

17 Q NOW, IN THE COURSE OF ALL YOUR READING -- I AM
18 GOING TO MAKE A CALCULATED GUESS -- HAVE YOU EVER READ
19 ANYTHING ABOUT A CON ARTIST?

20 A A CON ARTIST? WELL, A CON ARTIST IS A POP TERM
21 THAT REFERS TO SOMEONE WHO IS A SOCIOPATH. AND WHAT IS
22 COMMONLY REFERRED TO AS A SOCIOPATHIC PERSONALITY WHO -- GO
23 AHEAD.

24 Q OKAY. SAY SOMEONE COMES TO TRUST A CON ARTIST
25 BECAUSE THE CON ARTIST DOES THINGS FOR THAT PERSON WHO
26 TRUSTS HIM. WOULD YOU CALL THAT A POSITIVE TRANSFERENCE TO
27 THE CON ARTIST?

28 A IT COULD BE.

1 Q NOW, IF AFTER SOMEONE FOUND OUT THAT THEY HAD
2 BEEN DECEIVED BY THAT CON ARTIST, AND THEY NO LONGER TRUSTED
3 THE CON ARTIST, WOULD YOU CALL THAT NEGATIVE TRANSFERENCE?

4 A TO THE EXTENT THAT THE RAGE REACTION WAS NOT
5 COMMENSURATE WITH THE ACTUAL EVENTS OF THE RELATIONSHIP, IT
6 WOULD BE CONSIDERED A -- YOU COULD CONSIDER IT A NEGATIVE
7 TRANSFERENCE.

8 Q SO THOSE TERMS YOU WERE TALKING ABOUT --

9 A WHEN YOU -- LET ME JUST SAY WHEN YOU USE THOSE
10 TERMS, THE WAY YOU WOULD EVALUATE WOULD BE BASED ON WHAT,
11 YOU KNOW, THE FIT OF THE RESPONSE TO OR THE REACTION TO THE
12 ACTUAL CIRCUMSTANCES.

13 Q SO IF SOMEONE HAS AN UNPLEASANT EXPERIENCE WITH
14 SOMEONE ELSE, THEN THAT COULD EXPLAIN WHAT YOU WERE TELLING
15 US BEFORE ABOUT THE POSITIVE TRANSFERENCE AND THE NEGATIVE
16 TRANSFERENCE?

17 A IF SOMEONE HAS A --

18 Q WELL, HAD A PLEASANT EXPERIENCE AT THE OUTSET
19 AND THEN IT TURNED INTO A NEGATIVE EXPERIENCE, THAT WOULD
20 EXPLAIN WHAT YOU WERE REFERRING TO BEFORE WHEN YOU --

21 A IT WOULD BE AN EXAMPLE. YOU SEE THIS A LOT IN,
22 FOR EXAMPLE, WHEN PEOPLE ARE IN LOVE, EARLY IN LOVE
23 RELATIONSHIPS, AND THEN WHEN THEY BREAK OFF AND THEN THEY
24 ARE AS INTERESTED IN DESTROYING THE OTHER PERSON'S
25 PERSONALITY AS THEY WERE IN ELEVATING IT PREVIOUSLY.

26 IT IS SIMILAR DYNAMICS. IT IS A PRETTY
27 STANDARD, UNDERSTOOD DYNAMIC IN PSYCHOANALYSIS.

28 Q IN ALL OF YOUR READING AND SCHOLARLY RESEARCH,

1 WOULD YOU ESTIMATE THAT HYPNOSIS ITSELF MAY BE A PART OF A
2 THOUGHT REFORM PROGRAM?

3 A THAT HYPNOSIS ITSELF MIGHT BE A PART OF A
4 THOUGHT REFORM PROGRAM?

5 Q MAY BE A TOOL USED TO CONDITION SOMEONE TO A
6 THOUGHT REFORM PROGRAM?

7 A I SUPPOSE IT COULD BE.

8 Q WHEN WE WERE TALKING ABOUT THOUGHT REFORM
9 PROGRAMS, YOU KEPT -- EXCUSE ME -- YOU MENTIONED SEVERAL
10 TIMES DR. LIFTON'S BOOK "THOUGHT REFORM AND THE PSYCHOLOGY
11 OF TOTALISM."

12 A YES.

13 Q HAVE YOU STUDIED THAT TEXT?

14 A SOME YEARS AGO, YES.

15 Q DO YOU AGREE OR DISAGREE GENERALLY WITH THE
16 CONCEPT OFFERED BY DR. LIPTON -- LIPTON IN THAT BOOK?

17 A THAT THERE IS SUCH A THING AS THOUGHT REFORM,
18 YES.

19 Q NOW, LET ME REMIND YOU OF SOME OF THE AREAS AND
20 I WOULD SUGGEST SINCE DR. LIFTON -- DR. LIFTON AND DR.
21 MARGARET SINGER HAVE ON OCCASION CO-AUTHORED ABSTRACTS THAT
22 HAVE BEEN --

23 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. THAT IS
24 TESTIMONY BY COUNSEL AND I WOULD ASK THAT IT BE STRICKEN.

25 THE COURT: SUSTAINED.

26 MR. KLEIN: I WOULD ASK IT BE STRICKEN FOR THE
27 RECORD, YOUR HONOR.

28 THE COURT: LET'S PROCEED.

1 Q BY MR. LEVY: DO YOU RECALL THE AREA THAT HE
2 DISCUSSED CALLED MILIEU CONTROL?

3 A YES.

4 Q DID HE NOT SAY THAT AS PART OF A THOUGHT REFORM
5 PROGRAM, IF HE GAINED TOTAL CONTROL OVER A PERSON TO THE
6 DEGREE THAT IF YOU CAN CONTROL WHAT THEY WEAR, EAT, DO AND
7 THINK, THAT IS THE BEGINNING OF A THOUGHT REFORM PROGRAM?

8 A UH-HUH.

9 Q DID HE NOT SAY FOLLOWING THAT, THAT IF THERE IS
10 SOME MYSTICAL MANIPULATION WHERE THERE IS A CHARISMATIC
11 LEADER WHO STANDS IN A SPECIAL RELATIONSHIP WITH GODS THAT
12 WE CANNOT QUESTION, THAT THAT IS A PART OF A THOUGHT REFORM
13 PROGRAM?

14 A YES.

15 Q DID HE NOT SAY THAT THE SPIRITUAL DEMAND FOR
16 PURITY, THAT IT WAS A QUESTION OF GOOD VERSUS BAD OR PURE
17 VERSUS IMPURE, WAS A PART OF A THOUGHT REFORM PROGRAM?

18 A YES.

19 Q DID HE NOT SAY THAT IN A THOUGHT REFORM
20 PROGRAM, THAT IF YOU HAD A CULT OF CONFESSION WHERE, AS PART
21 OF YOUR THOUGHT REFORM PROGRAM, CONFESSION WAS DEMANDED, WAS
22 THAT PART OF HIS PROGRAM?

23 A YES.

24 Q DID HE NOT MENTION THAT THERE WOULD BE A
25 PSEUDO-SACRED SCIENCE THAT YOU COULD NOT QUESTION BECAUSE IT
26 WAS HANDED DOWN FROM SOME SPIRITUAL PERSON UP ABOVE, AND
27 THAT THERE WAS AN AIR TIGHT LOGIC AND AN ANSWER TO EVERY
28 QUESTION THAT WOULD COME UP THAT WOULD BE ANSWERED IN A

1 SPIRITUAL MANNER? DID HE NOT SAY THAT WAS PART OF A THOUGHT
2 REFORM PROGRAM?

3 A YES.

4 Q DID DR. LIFTON ALSO INCLUDE THE LOADING OF
5 LANGUAGE WITH PHRASES THAT WERE DISSIMILAR TO WHAT ONE MIGHT
6 FIND IN PUBLIC LIFE OUTSIDE AND APART FROM THE ENVIRONS OF A
7 NEW WAVE RELIGIOUS ORGANIZATION?

8 A UH-HUH.

9 Q WAS THAT PART OF THE THOUGHT REFORM PROGRAM?

10 A AS HE DESCRIBED IT, YES.

11 Q WAS ONE OF THE THINGS HE DESCRIBED IN HIS
12 THOUGHT REFORM PROGRAM THAT IT WAS A MATTER OF DOCTRINE OVER
13 PERSON, THAT ONE WAS CALLED UPON TO SUBORDINATE THEIR HUMAN
14 EXPERIENCE TO THE CLAIMS AND THE DICTATES OF THE RELIGIOUS
15 DOCTRINE OF THE NEW WAVE RELIGION, AND WAS THAT PART OF HIS
16 THOUGHT REFORM PROGRAM?

17 A YES.

18 Q AS PART OF HIS SCHOLARLY STUDY ON THOUGHT
19 REFORM PROGRAMS, DID HE NOT SAY THAT THE DISPENSING OF
20 EXISTENCE IN THAT THE SPIRITUAL LEADER WHO HAD THE RIGHT TO
21 DEFINE WHO HAD A RIGHT TO EXIST AND WHO DIDN'T WAS PART OF A
22 THOUGHT REFORM PROGRAM?

23 A YES, IT IS.

24 Q WOULD YOU AGREE THAT DR. LIFTON IS PROBABLY ONE
25 OF THE THREE OUTSTANDING SCHOLARS IN THE UNITED STATES WITH
26 REGARD TO THOUGHT REFORM PROGRAMS?

27 A YES, HE HAS THAT REPUTATION.

28 Q LET ME GIVE YOU JUST ONE LAST HYPOTHETICAL,

1 DOCTOR.

2 IF A PERSON, NO MATTER WHAT THE ORGANIZATION
3 THEY WERE IN, WAS SUBJECTED TO A COMBINATION OF THE
4 FOLLOWING THINGS -- ISOLATION, HYPNOSIS, PEER GROUP
5 PRESSURE, WHAT IS KNOWN AS LOVE BOMBING, THE REMOVAL OF
6 THEIR INDIVIDUAL PRIVACY, SLEEP DEPRIVATION AND FATIGUE,
7 SUBLIMINAL MESSAGES, A SYSTEM WHERE THERE IS A CONFUSING
8 DOCTRINE, WHERE THEY ARE CALLED UPON TO REJECT THEIR OLD
9 VALUES, WHERE THERE IS FORCED CONFESSION, WHERE GUILT
10 ABOUNDS, WHERE PEOPLE ARE SUBJECTED TO FEAR, BE IT SPIRITUAL
11 OR PHYSICAL, WHERE THERE IS CHANTING OR REPETITION DECREERING
12 FOR HOURS ON END, WHERE ONE ABDICATES ADULT RESPONSIBILITY,
13 WHERE THERE IS A FORCED CHANGE OF DIET, AN INDIVIDUAL IS
14 SUBJECTED TO CONTROLLED APPROVAL, WHERE THERE ARE DRESS
15 CODES AND THERE IS A FLAUNTING OF A SUPERIOR HIERARCHY,
16 WHERE PRECULT FAMILIES ARE DESTROYED OR DISCOURAGED, WHERE
17 PEOPLE ARE FORCED INTO A FINANCIAL COMMITMENT, WHERE FASTING
18 AND ENEMAS BECOME PART OF THE DAILY LIFE -- WOULD YOU
19 BELIEVE THAT A COMBINATION OF THOSE THINGS MIGHT INFLUENCE
20 SOMEONE AND CAUSE THEM TO SUCCUMB TO A THOUGHT REFORM
21 PROGRAM?

22 MR. KLEIN: YOUR HONOR, I WOULD OBJECT.

23 IT IS AN IMPROPER HYPOTHETICAL. THERE ARE NOT
24 FACTS --

25 THE COURT: OVERRULED. HE CAN ANSWER.

26 THE WITNESS: WELL, IT WOULD CERTAINLY -- IF ALL OF
27 THOSE THINGS WERE PRESENT AND THE -- AND THE WAY IN WHICH
28 YOU LIST THEM, IT WOULD CERTAINLY BE INFLUENTIAL ON A

1 PERSON. IT WOULD BE INFLUENTIAL. I'VE TESTIFIED EARLIER
2 THAT I WOULD NOT --

3 MR. LEVY: EXCUSE ME, SIR, THERE IS NO QUESTION
4 PENDING RIGHT NOW. YOU'VE ANSWERED MY QUESTION. THANK YOU,
5 DOCTOR. I HAVE NOTHING FURTHER FOR YOU.

6 MR. KLEIN: THANK YOU.

7

8

REDIRECT EXAMINATION

9

BY MR. KLEIN:

10 Q DR. MOORE, WITH RESPECT TO DR. LIFTON, WAS
11 THERE ANYTHING ELSE THAT HE SAID WAS NECESSARY FOR A THOUGHT
12 REFORM PROGRAM THAT MR. LEVY DIDN'T READ?

13 A I THINK HE READ THE SALIENT POINTS.

14 Q YOU AGREE WITH DR. LIFTON -- LET ME WITHDRAW
15 THAT.

16 DID DR. LIFTON SAY -- DID HE DEFINE A THOUGHT
17 REFORM PROGRAM IN HIS BOOK?

18 A HE DEFINED IT AS THE CONTROL OF ONE'S
19 PERSONALITY THROUGH THESE VARIOUS MEANS, YES. MODELING IT
20 ON THE STUDIES OF PRISONERS OF WAR, ET CETERA, AND THE
21 CHINESE PRACTICES.

22 Q DID HIS BOOK DEAL WITH KOREAN PRISONERS OF WAR?

23 A IT DEALT WITH THE PRACTICES PARALLELING THAT,
24 YES.

25 Q WERE THERE COERCIVE ASPECTS OF THE THOUGHT
26 REFORM PROGRAM THAT HIS BOOK DEALT WITH?

27 A UH-HUH. YES.

28 WHERE I DIFFER -- WHERE I DIFFER WITH MR.

1 LIFTON IS IN THE TENDENCY HE HAS TO EXPAND THESE PRINCIPLES
2 AND APPLY THEM SORT OF ACROSS THE BOARD TO RELIGIOUS GROUPS
3 SORT OF UNCRITICALLY. AND THAT IS MY DIFFERENCE WITH BOTH
4 MR. LIFTON AND WITH MR. SINGER -- I MEAN MISS SINGER.

5 Q WITH RESPECT TO THAT LONG LIST OF FACTORS THAT
6 MR. LEVY JUST READ TO YOU -- ISOLATION, FORCED CHANGE OF
7 DIET, DRESS CODES, PRECULT FAMILIES DISCOURAGED AND ALL THE
8 OTHERS -- DID YOU FIND ALL OF THOSE FACTORS TO BE PRESENT
9 DURING THE TIME THAT YOU STUDIED CHURCH UNIVERSAL AND
10 TRIUMPHANT?

11 A NO, I DID NOT. FOR EXAMPLE, THE THING ABOUT
12 THE --

13 MR. LEVY: OBJECTION, YOUR HONOR. THE QUESTION HAS
14 BEEN ASKED AND ANSWERED.

15 Q BY MR. KLEIN: DID YOU FIND THE ISOLATION TO BE
16 PRESENT?

17 A NOT FORCED ISOLATION.

18 Q DID YOU FIND HYPNOSIS?

19 A I SAW NO EVIDENCE OF HYPNOSIS.

20 Q DID YOU FIND SLEEP DEPRIVATION AND FATIGUE?

21 A I SAW NO ATTEMPT TO DEPRIVE PEOPLE OF SLEEP. I
22 GOT PLENTY OF SLEEP. PEOPLE THAT WERE IN THE DORMITORY
23 WHERE I WAS GOT PLENTY OF SLEEP.

24 Q AND IN YOUR DISCUSSIONS WITH MEMBERS, DID YOU
25 COME TO THE CONCLUSION THAT GUILT ABOUNDS?

26 A THAT GUILT ABOUNDS?

27 Q GUILT ABOUNDS. I THINK THAT IS THE WORD MR.
28 LEVY USED, GUILT ABOUNDS.

1 A IN COMPARISON TO WHAT? YOU MEAN IN COMPARISON
2 TO OTHER RELIGIONS?

3 Q I GUESS IN COMPARISON TO THE NORMAL POPULATION.

4 A I SAW NO EVIDENCE THAT IT WAS GREATER THAN THE
5 NORMAL POPULATION.

6 Q DID YOU FIND EVIDENCE THAT FEAR, SPIRITUAL OR
7 PHYSICAL FEAR, WAS PRESENT TO A DEGREE DIFFERENT THAN THE
8 NORMAL POPULATION?

9 A I DIDN'T SEE ANY EVIDENCE OF THAT.

10 Q DID YOU SEE OR HEAR ANY EVIDENCE OF A FORCED
11 CHANGE OF DIET?

12 A NOT A FORCED CHANGE OF DIET. IT WAS VEGETARIAN
13 AS I TESTIFIED EARLIER. BUT I SAW NO ONE FORCED TO CHANGE A
14 DIET.

15 Q DID YOU --

16 A THEY CHOSE TO EAT WHAT WAS THERE WAS MY SENSE.

17 Q DID YOU SEE ANY EVIDENCE OF -- THAT THERE WAS A
18 DRESS CODE THAT EVERYBODY HAD TO ADHERE TO?

19 A PEOPLE WERE DRESSED IN VARIOUS WAYS AT THIS
20 PARTICULAR CONFERENCE WHERE I ATTENDED. AND AT THE TEACHING
21 CENTER -- TEACHING CENTERS THAT I VISITED, PEOPLE DRESSED IN
22 STREET CLOTHES. I THINK SOME OF THE LEADERS HAD SPECIAL
23 OUTFITS. BUT I DIDN'T SEE THAT IN THE REGULAR PEOPLE.

24 Q AT THE BEGINNING OF HIS QUESTIONING, MR. LEVY
25 ASKED YOU IF YOU OBSERVED CHURCH UNIVERSAL AND TRIUMPHANT
26 MEMBERS MUCH THE WAY HE OBSERVED YOU IN THIS COURTROOM.

27 ASSUMING THAT BY THAT HE MEANT HE IS SITTING
28 HERE AND HE IS LOOKING AT YOU ON THE STAND, DID YOU DO MORE

1 THAN THAT IN OBSERVING CHURCH UNIVERSAL AND TRIUMPHANT
2 MEMBERS?

3 A OH, YES. I TALKED WITH THEM QUITE INTENSIVELY.
4 AND I DID OBSERVE THEM IN VARIOUS ACTIVITIES.

5 Q ALSO IN RESPONSE TO SOME OF MR. LEVY'S
6 QUESTIONS, IN YOUR TESTIMONY THAT YOU BELIEVED MR. MULL'S
7 BEHAVIOR WAS CONSISTENT WITH FIRST A POSITIVE AND THEN A
8 NEGATIVE TRANSFERENCE, HE MENTIONED SOMETHING ABOUT THAT
9 BEING A GUESS.

10 IS THAT A GUESS ON YOUR PART?

11 A WELL, IT IS A CONSIDERED JUDGMENT BASED ON MY
12 TRAINING AND EXPERIENCE.

13 Q WITH RESPECT TO THE IDEA OF IDEALIZING A
14 LEADER, A RELIGIOUS LEADER, IS IT KNOWN AS TO WHETHER THAT
15 IDEALIZATION COMES FROM THINGS THAT THE LEADER DOES, FROM
16 THINGS IN THE PERSON'S BACKGROUND OR ARE THERE OTHER
17 FACTORS?

18 DO PSYCHOLOGISTS HAVE OPINIONS ON WHAT CAUSES
19 THAT IDEALIZATION?

20 A YES, THERE ARE THEORIES ABOUT WHAT CAUSES ONE
21 TO IDEALIZE SOMEONE WHEN ONE IS AN ADULT. YES.

22 Q IS THERE ONE THEORY THAT IS MORE PREVALENT THAN
23 OTHERS AS TO WHY SOMEBODY IDEALIZES A LEADER?

24 A WELL, THE MOST FAMOUS THEORY IS THAT OF HEINZ
25 KOHUT, A GREAT PSYCHOANALYST WHO BELIEVES THAT EVERY PERSON
26 IN EARLY CHILDHOOD HAS THE NEED TO IDEALIZE A PARENT. AND
27 IF THE PARENT IN SOME WAY WAS NOT ABLE TO ALLOW THAT TO
28 HAPPEN, THEN THE PERSON GOES THROUGH LIFE LOOKING FOR

1 SOMEBODY TO IDEALIZE.

2 IF THE PERSON WAS ABLE TO HAVE THAT KIND OF
3 EXPERIENCE AT THE TIME WHEN IT WAS NEEDED AS A CHILD, THEN
4 THEY GO THROUGH LIFE AND ARE NOT REALLY SEARCHING FOR
5 SOMEONE TO IDEALIZE QUITE AS MUCH. THAT IS KOHUT'S THEORY
6 IN HIS BOOK "THE ANALYSIS OF THE SELF" AND THE BOOK "THE
7 RESTORATION OF THE SELF."

8 Q DO YOU ACCEPT THAT THEORY?

9 A YES, I DO.

10 Q IN YOUR DEALINGS WITH PEOPLE IN STUDIES OF
11 POSITIVE AND NEGATIVE TRANSFERENCE, IS THERE -- ARE THE
12 STATEMENTS BY THE VICTIM OR THE PERSON THAT IS EXHIBITING
13 THE POSITIVE AND NEGATIVE TRANSFERENCE, HAVE YOU FOUND THAT
14 TO BE REALISTIC ASSESSMENTS OF THE SITUATION, OVERREACTIONS,
15 EXAGGERATIONS, WHAT HAVE YOU, FOUND IN YOUR OWN STUDIES AND
16 YOUR OWN EXPERIENCE?

17 MR. LEVY: I AM GOING TO HAVE TO OBJECT TO THE
18 QUESTION, YOUR HONOR, BECAUSE IT DOESN'T SET UP THE BASIS
19 FOR THE HYPOTHETICAL. I HAVE NO QUARREL WITH THE
20 HYPOTHETICAL BUT --

21 THE COURT: PLEASE REPHRASE IT.

22 MR. KLEIN: YES.

23 Q WITH RESPECT TO POSITIVE AND NEGATIVE
24 TRANSFERENCE IN YOUR OWN STUDIES AND YOUR OWN EXPERIENCE,
25 HAVE THE STATEMENTS MADE BY THE INDIVIDUALS DESCRIBING THEIR
26 EXPERIENCES, BE THEY THE POSITIVE OR THE NEGATIVE, ARE THEY
27 HYPOTHETICALLY REALISTIC EVALUATIONS OR ARE THEY
28 EXAGGERATIONS?

1 A ALMOST ALWAYS EXAGGERATIONS.

2 Q BOTH ON THE POSITIVE AND THE NEGATIVE SIDE?

3 A YES. BOTH ON THE POSITIVE AND ON THE NEGATIVE.
4 THAT IS THE WAY AN ANALYST TELLS THAT SUCH A TRANSFERENCE IS
5 OCCURRING. IF THE ANALYST FEELS HIMSELF TO BE BEING VIEWED
6 BY AN ANALYSAND AS THE GREAT WONDERFUL THERAPIST, THE MAGIC
7 HELPER, THEN THE ANALYST KNOWS THAT THERE IS AN INTENSE
8 POSITIVE TRANSFERENCE.

9 AND CONVERSELY, IF HE FEELS HIMSELF BEING
10 CHARACTERIZED AS A WITHHOLDING PERSON WHO IS NOT AT ALL
11 HELPFUL AND IS WITHHOLDING CONCERN AND NURTURANCE AND SO
12 FORTH AND IS ATTACKED VERY, VERY VOCIFEROUSLY, USUALLY IT IS
13 VIEWED THAT YOU ARE SEEING A REPLAY OF ANGER TOWARD A
14 WITHHOLDING PARENT.

15 Q YOU SAID THAT YOU DID NOT HAVE AN OPPORTUNITY
16 TO PERSONALLY MEET ELIZABETH CLARE PROPHET.

17 WHEN YOU WERE AT CAMELOT FOR THAT WEEK, DID YOU
18 HAVE AN OPPORTUNITY TO OBSERVE HER AT ANY TIME?

19 A YES.

20 Q IN WHAT SITUATIONS DID YOU OBSERVE HER?

21 A SHE WAS LEADING A NUMBER OF SERVICES IN THE
22 AUDITORIUM AT SUMMIT UNIVERSITY PREVIOUSLY AND THEN AT THE
23 CHAPEL AT CAMELOT. AND I ALSO OBSERVED HER IN THE ASHRAM IN
24 L.A. IN BETWEEN THOSE TIMES.

25 Q DURING THE TIME YOU OBSERVED HER, DID SHE DO OR
26 SAY ANYTHING THAT LED YOU TO FORM A CONCLUSION THAT SHE WAS
27 IN SOME WAY TRYING TO HYPNOTIZE HER CHURCH MEMBERS?

28 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR

1 HONOR, BECAUSE THIS WITNESS HAS TOLD US HE DOES NOT USE
2 HYPNOSIS, HE IS NOT KNOWLEDGEABLE OR QUALIFIED OR LICENSED
3 IN THE USE OF HYPNOSIS.

4 THE COURT: SUSTAINED.

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

6 THANK YOU. I HAVE NO FURTHER QUESTIONS.

7 MR. LEVY: JUST A COUPLE, YOUR HONOR.

8 THE COURT: ALL RIGHT.
9

10 RE-CROSS-EXAMINATION

11 BY MR. LEVY: DR. MOORE.

12 A YES.

13 Q DID YOU EVER ATTEND SUMMIT UNIVERSITY AS A
14 STUDENT OF THE CHURCH?

15 A NO.

16 Q IN THE COURSE OF YOUR 50 IN-DEPTH INTERVIEWS
17 WITH STUDENTS, DID YOU DISCOVER WHAT THE POLICY THAT THE
18 CHURCH HAD WITH REGARD TO FASTING WAS?

19 A NO, I DID NOT AT THAT TIME. I DID NOT HEAR
20 ANYTHING ABOUT FASTING. I KNEW THAT THE STUDENTS FASTED. I
21 DID NOT HEAR ANYTHING ABOUT THE POLICY ABOUT FASTING.

22 Q WHAT ABOUT ENEMAS? ENEMAS?

23 A COLON -- I KNEW THAT THEY DID PRACTICE YOGIC
24 PRACTICES, COLONICS.

25 Q DO YOU KNOW WHAT THE SPECIFICS -- WHAT THE
26 REQUIREMENTS WERE FOR MEMBERS OF THAT CHURCH ARE WITH
27 REFERENCE TO ENEMAS OR COLONICS?

28 A NO, I DON'T.

1 Q WHAT ABOUT THE SPECIFICS WITH REGARD TO
2 CLEARANCE LETTERS OR CONFESSION LETTERS?

3 A AT THAT TIME I KNEW NOTHING ABOUT CLEARANCE
4 LETTERS, NO.

5 Q AT THE TIME YOU ATTENDED FOR THAT WEEK AND YOU
6 DID YOUR 50 IN-DEPTH INTERVIEWS, DID YOU LEARN ABOUT THEIR
7 DOCTRINE, THE RELIGIOUS DOCTRINE?

8 A I HAVE STUDIED THEIR DOCTRINE IN SOME DEPTH
9 WITH THE PEOPLE AT THE CHICAGO TEACHING CENTER USING THEIR
10 LITERATURE. SO I WAS FAMILIAR WITH THAT, YES.

11 Q AT THE TIME YOU ATTENDED THE CONFERENCE, AND
12 EVEN NOW, DO YOU KNOW WHAT THE DAILY SCHEDULE IS FOR SOMEONE
13 WHO ATTENDS SUMMIT UNIVERSITY?

14 A I AM NOT FAMILIAR WITH A SCHEDULE THAT IS
15 SUPPLIED TO EVERY STUDENT, NO.

16 Q WOULD IT BE FAIR TO SAY THAT YOU SAW EXACTLY
17 WHAT THERE WAS TO SEE, AND YOU CHATTED WITH THE PEOPLE AT
18 THIS PUBLIC CONFERENCE, AND THEN, LIKE YOU SAID BEFORE,
19 SINCE THE PUBLIC WAS THERE, IN ALL PROBABILITY THEY PUT
20 THEIR BEST FOOT FORWARD SO WHAT YOU SAW WAS THEIR BEST FOOT
21 FORWARD?

22 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT. IT IS
23 VAGUE AND AMBIGUOUS AND COMPOUND QUESTION.

24 MR. LEVY: I BET AS A PSYCHOLOGIST HE KNOWS WHAT I AM
25 TALKING ABOUT, THOUGH.

26 MR. KLEIN: IF YOU CAN ASK IT RIGHT HE CAN EVEN
27 ANSWER IT.

28 THE COURT: GENTLEMEN.

1 MR. LEVY: I HAVE NOTHING FURTHER, YOUR HONOR.

2 THE COURT: ANYTHING ELSE?

3 MR. KLEIN: YES, YOUR HONOR.

4

5

REDIRECT EXAMINATION (FURTHER)

6

BY MR. KLEIN:

7

8

9

10

Q DR. MOORE, WERE RESPECT TO THE OPINIONS YOU
HAVE GIVEN US TODAY, WOULD THE FACT THAT YOU DIDN'T KNOW
SPECIFICS REGARDING FASTING AND COLONICS AND CONFESSIONS IN
ANY WAY AFFECT THE OPINIONS YOU'VE GIVEN US?

11

A NO, IT WOULD NOT. CAN I ELABORATE ON THAT?

12

Q SURE.

13

14

15

16

17

18

19

20

21

22

23

24

A ANYONE WHO KNOWS ANYTHING ABOUT THE HISTORY OF
RELIGIOUS PRACTICE KNOWS THAT FASTING IS AN ACCEPTED
RELIGIOUS PRACTICE IN MANY RELIGIONS, INCLUDING THE ROMAN
CATHOLIC. THEY WOULD KNOW THAT COLONICS IS PRACTICED IN
MANY YOGA GROUPS AND IS WIDELY ACCEPTED PRACTICE TO PEOPLE
THAT PRACTICE YOGA.

25

MR. LEVY: AT THIS POINT -- EXCUSE ME, DOCTOR.

26

27

AT THIS POINT, I AM GOING TO OBJECT. THE
RESPONSE TO THE QUESTION NOW --

28

THE COURT: IT'S TIME FOR ANOTHER QUESTION.

1 Q BY MR. KLEIN: ARE CONFESSIONS ALSO TYPICAL IN
2 DIFFERENT RELIGIONS PURSUANT TO YOUR STUDIES?

3 A YES, THEY ARE. CERTAINLY.

4 MR. KLEIN: THANK YOU.

5 I HAVE NO FURTHER QUESTIONS.

6 MR. LEVY: ONE LAST QUESTION.

7
8 RECROSS-EXAMINATION (FURTHER)

9 BY MR. LEVY:

10 Q WITH REGARD TO THOSE REGULAR PRACTICES IN -- OF
11 CONFESSION, IN YOUR EXPERIENCE IN CHURCHES, IS IT ALSO THE
12 PRACTICE IN MOST CHURCHES THAT YOU HAVE STUDIED THAT THE
13 PRIEST WHO RECEIVES THE CONFESSION HAS THE UNILATERAL
14 AUTHORITY TO DISPENSE THAT PRIVILEGED INFORMATION AT
15 WHATEVER TIME HE OR SHE PLEASES?

16 A NO, THAT IS NOT MY KNOWLEDGE. NO.

17 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

18 MR. KLEIN: NOTHING FURTHER.

19 THE COURT: ALL RIGHT, MR. MOORE. YOU ARE EXCUSED.

20 WHY DON'T WE TAKE A SHORT RECESS AT THIS TIME.
21 LET'S RESUME AT 20 MINUTES BEFORE 4:00.

22 (RECESS.)
23
24
25
26
27
28

1 THE COURT: YES, SIR.

2 MR. KLEIN: ANNE COURTRIGHT, YOUR HONOR.

3

4 ANNE COURTRIGHT, +

5 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,

6 TESTIFIES AS FOLLOWS:

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

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

9 FIRST AND LAST NAME.

10 THE WITNESS: MY NAME IS ANNE COURTRIGHT. A-N-N-E;

11 COURTRIGHT, C-O-U-R-T-R-I-G-H-T.

12 THE CLERK: THANKS.

13

14 DIRECT EXAMINATION +

15 BY MR. KLEIN:

16 Q MISS COURTRIGHT, ARE YOU PRESENTLY EMPLOYED?

17 A YES, I AM.

18 Q WHAT DO YOU DO?

19 A I DO HIGH LEVEL TECHNICAL PLACEMENT FOR

20 ENGINEERS.

21 Q SORT OF A HEADHUNTER, IS THAT WHAT IT IS

22 CALLED?

23 A YES, THAT IS A COMMON NAME FOR IT.

24 Q ARE YOU CURRENTLY AFFILIATED WITH CHURCH

25 UNIVERSAL AND TRIUMPHANT?

26 A YES, I AM.

27 Q WHAT IS THE NATURE OF THAT AFFILIATION?

28 A I AM A COMMUNITY MEMBER.

1 Q ARE YOU A STAFF MEMBER?

2 A NO, I AM NOT AT THIS TIME.

3 Q HAD YOU BEEN A STAFF MEMBER?

4 A YES. I WAS FOR SEVEN YEARS.

5 Q WHAT YEARS WERE YOU A STAFF MEMBER?

6 A FROM 1976 UNTIL 1983.

7 Q AND AT THIS TIME, YOU ARE JUST A MEMBER?

8 A I WAS A STAFF MEMBER.

9 Q I AM SAYING NOW, THOUGH.

10 A YES. AT THIS TIME I AM A COMMUNITY MEMBER.

11 Q DO YOU KNOW GREGORY MULL?

12 A YES.

13 Q WHEN DID YOU FIRST COME IN CONTACT WITH GREGORY
14 MULL?

15 A I FIRST MET GREGORY MULL WHEN -- IN THE WINTER
16 OF 1975. AND DURING THAT TIME, I HAD A DAUGHTER WHO WAS IN
17 MONTESSORI INTERNATIONAL --

18 Q LET ME JUST ASK YOU, WHAT WERE THE
19 CIRCUMSTANCES THAT YOU MET MR. MULL?

20 A ALL RIGHT. I HAD A TWO YEAR OLD DAUGHTER THAT
21 WAS IN OUR PRESCHOOL PROGRAM, AND I WOULD PICK HER UP FROM
22 SCHOOL, WHICH WAS OFF-SITE, AND TAKE HER TO WHERE SUMMIT
23 UNIVERSITY WAS BEING HELD FOR LUNCH AND --

24 Q JUST STOP ONE MOMENT. WERE YOU ATTENDING
25 SUMMIT UNIVERSITY AT THAT TIME?

26 A NO, I WAS NOT.

27 Q WERE YOU A CHURCH MEMBER?

28 A YES, I WAS.

1 Q AND WHY AT THAT TIME IN 1975 WOULD YOU GO TO
2 SUMMIT UNIVERSITY?

3 A THAT'S WHERE LUNCH WAS SERVED AND I WANTED MY
4 DAUGHTER TO HAVE A GOOD LUNCH SO I BROUGHT HER THERE.

5 Q NOW, WHEN YOU WENT TO SUMMIT UNIVERSITY AT THAT
6 TIME, THAT WAS IN 1975?

7 A YES, IN SANTA BARBARA.

8 Q DID YOU HAVE OCCASION TO MEET GREGORY MULL?

9 A YES.

10 Q HOW DID IT COME ABOUT THAT YOU MET MR. MULL IN
11 1975?

12 A WELL, WE HAD OUR LUNCHEON SERVED IN A
13 CAFETERIA, AND THEN WE WOULD COME OUT TO THE PICNIC TABLES
14 AND EAT IN SANTA BARBARA. AND MY LITTLE GIRL TOOK A LONG
15 TIME TO EAT HER LUNCH BECAUSE SHE WAS LITTLE. AND MANY OF
16 THE STUDENTS, WE WOULD SHARE THE SAME TABLES.

17 Q WHEN YOU SAY, "THE STUDENTS," STUDENTS
18 ATTENDING SUMMIT UNIVERSITY?

19 A STUDENTS ATTENDING SUMMIT UNIVERSITY. THEY
20 WOULD COME AND SIT WITH US AND GREGORY CAME AND SAT AT OUR
21 TABLE.

22 Q AT THE TIME WAS HE A STUDENT AT SUMMIT
23 UNIVERSITY?

24 A YES, HE WAS.

25 Q AND WHEN -- APPROXIMATELY HOW MANY TIMES DID
26 YOU HAVE LUNCH WITH GREGORY MULL DURING THAT 1975 QUARTER
27 WHEN HE WAS AT SUMMIT UNIVERSITY?

28 A WELL, ONCE WE MET HIM, WE SAW HIM -- WE SAW HIM

1 EVERY DAY AND ATE LUNCH WITH HIM VERY, VERY OFTEN. ALMOST
2 EVERY DAY.

3 Q DURING THE TIME THAT YOU WOULD SEE HIM AT
4 SUMMIT UNIVERSITY AND YOU AND YOUR DAUGHTER WOULD HAVE LUNCH
5 WITH HIM, WOULD YOU TALK WITH HIM ABOUT SUMMIT UNIVERSITY?

6 A YES. I HAD ATTENDED THE PREVIOUS QUARTER, AND
7 HE WAS ATTENDING HIS QUARTER AND WE WOULD --

8 MR. LEVY: EXCUSE ME, YOUR HONOR. I AM GOING TO
9 OBJECT AT THIS TIME. THE QUESTION CALLED FOR A YES OR NO
10 ANSWER.

11 THE COURT: THE QUESTION HAS BEEN ANSWERED.

12 Q BY MR. KLEIN: TELL US IN SUBSTANCE AS BEST YOU
13 CAN RECALL WHAT THINGS MR. MULL SAID ABOUT SUMMIT UNIVERSITY
14 WHEN YOU MET WITH HIM AT SUMMIT UNIVERSITY IN 1975.

15 A ALL RIGHT. THE KIND OF THINGS WE DISCUSSED
16 WERE SORT OF LIKE STUDENT THINGS. HE WOULD TELL ME WHAT HE
17 WAS DOING. HE WAS VERY EXCITED. HE WAS TELLING ME ABOUT
18 THE DIFFERENT TEACHINGS HE WAS LEARNING. EVERY QUARTER
19 WOULD BE A LITTLE DIFFERENT.

20 HE WAS TELLING ME OF THE NEW THINGS HE WAS
21 LEARNING AND WE WERE COMPARING FAMILY NOTES. HE WAS TELLING
22 ME HOW HE CALLED HIS DAUGHTER, AND I HAD A DAUGHTER THAT
23 AGE, AND SHE WAS IN SAN FRANCISCO. AND HE WOULD TELL HER
24 ABOUT THE TEACHINGS, AND HOW IT WAS CHANGING HIS LIFE AND
25 HOW HE WANTED TO SHARE IT WITH HIS DAUGHTER.

26 AND I WAS GOING OVER SOME OF THE CHANGES THAT
27 HAD HAPPENED WITH MY CHILDREN WHEN I WENT THROUGH SUMMIT
28 UNIVERSITY.

1 Q DID HE EVER SAY ANYTHING TO INDICATE WHETHER OR
2 NOT HE WAS ENJOYING HIMSELF AT SUMMIT UNIVERSITY?

3 A WELL, YES. HE WAS -- HE INDICATED HE WAS
4 ENJOYING HIMSELF VERY MUCH.

5 Q DID HE EVER COMPLAIN ABOUT THE FOOD AT SUMMIT
6 UNIVERSITY TO YOU?

7 A NO. WE SAT AND ATE LUNCH.

8 Q DID HE EVER COMPLAIN ABOUT NOT GETTING ENOUGH
9 SLEEP AT SUMMIT UNIVERSITY?

10 A NO. HE -- HE LOOKED JUST LIKE I DID. HE --

11 MR. LEVY: EXCUSE ME, YOUR HONOR. I AM GOING TO
12 OBJECT AND ASK THAT EVERYTHING AFTER THE YES OR NO RESPONSE
13 BE STRICKEN AS NONRESPONSIVE AND SELF-SERVING AND I MOVE IT
14 BE STRICKEN FROM THE RECORD.

15 THE COURT: EVERYTHING AFTER THE WORD "NO" IS
16 STRICKEN. JURY IS DIRECTED TO DISREGARD IT.

17 Q BY MR. KLEIN: NOW AFTER THAT QUARTER AT SUMMIT
18 UNIVERSITY IN 1975, DID YOU HAVE ANY FURTHER CONTACT WITH
19 MR. MULL?

20 A YES, I DID.

21 Q WHAT WAS THE NATURE OF THE FURTHER CONTACT?

22 A WELL, HE WOULD WRITE MY DAUGHTER NOTES AND
23 LETTERS AND CORRESPOND WITH US. AND SHE COULDN'T READ SO
24 SOME OF THE CONTENT OF THE LETTER WOULD BE FOR ME TO READ TO
25 HER. HE CALLED HIMSELF HER DADDY FRIEND, SO HE WOULD WRITE
26 TO HER AS HER DADDY FRIEND AND I WOULD READ HER THE LETTERS.

27 Q DID THERE COME A TIME WHEN YOU VISITED HIM AT
28 HIS HOME IN SAN FRANCISCO?

1 A YES. IN THE SUMMER OF 1975 --

2 MR. LEVY: EXCUSE ME. I AM GOING TO OBJECT AGAIN.
3 CALLED FOR A YES OR NO ANSWER.

4 Q BY MR. KLEIN: WHEN DID YOU VISIT HIM AT HIS
5 HOME IN SAN FRANCISCO? WHAT YEAR?

6 A 1975.

7 Q HOW DID IT COME ABOUT THAT YOU VISITED HIM AT
8 HIS HOME IN SAN FRANCISCO? HOW DID THAT HAPPEN?

9 A YOUR HONOR, I DON'T -- I VISITED HIM AS I LEFT
10 THE CONFERENCE IN 1975. I TRAVELED DOWN FROM SHASTA,
11 CALIFORNIA, AND STOPPED IN SAN FRANCISCO ON MY WAY TO SANTA
12 BARBARA.

13 Q HAD HE INVITED YOU TO VISIT HIM IN SAN
14 FRANCISCO?

15 A YES. WHEN WE WERE AT THE CLASS IN THE SUMMER
16 CONFERENCE IN SHASTA, HE HAD DINNER WITH ME AND MY CHILDREN
17 AND INVITED US TO STOP THERE ON OUR WAY BACK.

18 Q AND WHEN YOU STAYED -- DID YOU STAY AT HIS
19 HOUSE IN SAN FRANCISCO?

20 A YES. YES, I DID.

21 Q AND DURING THE TIME THAT YOU STAYED AT HIS
22 HOUSE WITH HIM IN SAN FRANCISCO, DID THERE COME A TIME WHEN
23 YOU HAD A CONVERSATION WITH HIM WHERE HE DISCUSSED PERSONAL
24 MATTERS ABOUT HIS PAST?

25 A YES.

26 Q WHAT DID HE SAY?

27 A I WAS THERE SEVERAL DAYS. AND THE MORNING I
28 WAS GOING TO LEAVE, HE AND I HAD TEA ON HIS PATIO.

1 Q WAS ANYONE ELSE PRESENT?

2 A NO. HE MADE SURE THAT JUST MY DAUGHTER WAS
3 BEING BABY-SAT BY HIS DAUGHTER.

4 Q WHAT DID HE SAY?

5 A HE TOLD ME HOW MUCH THE TEACHINGS HAD CHANGED
6 HIS LIFE. HE TOLD ME THAT HE HAD BEEN A HOMOSEXUAL FOR A
7 LONG TIME, THAT HIS MARRIAGE HAD BEEN DISSOLVED BECAUSE OF
8 HIS INVOLVEMENT WITH OTHER MEN. AND THAT WAS WHEN LINDA --
9 LINDA, HIS DAUGHTER, WAS QUITE LITTLE. AND THAT THAT WAS
10 BASICALLY THE REASON HE GOT A DIVORCE.

11 Q DID HE SAY ANYTHING ABOUT WHETHER HE WAS THEN
12 IN 1975 STILL A HOMOSEXUAL?

13 A HE TOLD ME THAT HE HAD TRIED A LOT OF -- WELL,
14 BASICALLY THAT HE HAD GONE THROUGH ANALYSIS FOR SEVEN YEARS
15 TO GET OVER HOMOSEXUALITY. BUT THAT NOTHING REALLY SEEMED
16 TO BE CURING HIM UNTIL HE FOUND THE TEACHINGS AND HE WAS
17 TELLING ME HOW THE TEACHINGS HAD REALLY FINALLY CURED HIM OF
18 HIS PROBLEM.

19 Q DID THERE COME A TIME WHEN YOU DISCUSSED THIS
20 SUBJECT WITH KATHLEEN HAMMOND?

21 A YES.

22 Q NOW KATHLEEN HAMMOND LATER BECAME KATHLEEN
23 MULL; IS THAT RIGHT?

24 A YES.

25 Q WHEN DID YOU DISCUSS THAT SUBJECT WITH KATHLEEN
26 HAMMOND?

27 A WELL, AFTER GREGORY AND I HAD TEA ON HIS PATIO,
28 LINDA HAD TAKEN MY LITTLE GIRL TO KATHLEEN HAMMOND'S HOUSE,

1 WHICH WAS JUST SEVERAL DOORS AWAY. SO I WALKED DOWN TO
2 KATHLEEN'S TO PICK UP MY DAUGHTER. AND GREGORY STAYED BACK
3 AT HIS PLACE.

4 AND WHEN I WENT TO SEE KATHLEEN, SHE SAID, "DID
5 HE TELL YOU HE WAS GAY?"

6 AND I SAID, "YES." I WAS PRETTY SURPRISED SHE
7 ASKED ME, BUT I SAID, "YES."

8 AND SHE SAID, "WELL" --

9 MR. LEVY: AT THIS POINT, YOUR HONOR, I AM GOING TO
10 OBJECT. THE HEARSAY IS BECOMING A LITTLE BIT HEAVY.

11 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

12 MR. KLEIN: YOUR HONOR, IT IS NOT FOR THE TRUTH OF
13 THE STATEMENT. YOUR HONOR, IT IS FOR THE FACT THAT IT WAS
14 SAID.

15 MR. LEVY: SHE IS STILL TESTIFYING AS TO WHAT
16 SOMEBODY --

17 THE COURT: IT IS TIME FOR ANOTHER QUESTION. LET'S
18 KEEP THE EVIDENCE CODE IN MIND.

19 MR. KLEIN: YES, YOUR HONOR.

20 Q NOW, DURING THE TIME THAT YOU'VE BEEN
21 AFFILIATED WITH THE CHURCH, DID YOU EVER WORK AT CAMELOT?

22 A YES.

23 Q WHEN WAS THAT?

24 A I WORKED ON STAFF FROM 1976 TILL 1983 IN THE
25 KITCHEN AND IN THE BUSINESS OFFICE PRIMARILY.

26 Q WHEN YOU WORKED ON THE STAFF IN THE KITCHEN,
27 WHAT WAS YOUR PARTICULAR DUTIES?

28 A WELL, FOR FIVE OF THE SEVEN YEARS, I WAS THE

1 MAIN SUPERVISOR OF BREAKFAST EVERY SINGLE DAY.

2 Q WHAT WAS A TYPICAL BREAKFAST DURING THE YEARS
3 THAT YOU WERE WORKING THERE?

4 A WELL, IT BEGAN VERY EARLY. IT WOULD CONSIST OF
5 A WHOLE-GRAIN CEREAL THAT USUALLY I WOULD SUPERVISE THEM
6 GRINDING THE NIGHT BEFORE, A COOKED CEREAL. GRANOLA, EGGS
7 EVERY DAY. SOFT BOILED EGGS, SOMETIMES WE HAD SCRAMBLED
8 EGGS. BREAD, TOAST, JUICE, MILK, COFFEE, TEA. VERY LARGE
9 SELECTION OF FRESH FRUIT EVERY DAY. I HAD TO SEE THAT IT
10 WAS WASHED.

11 AND THEN WE HAD A SALAD BAR AS WELL, WHICH WAS
12 FOR ANYONE WHO NEEDED TO TAKE OUT A LUNCH, OR WE WOULD PUT
13 LEFTOVERS ON THE SALAD BAR AS WELL. IT WAS JUST A TAKE-OUT
14 IF SOMEONE NEEDED IT.

15 Q DID YOU WORK AT CAMELOT IN 1979 AND 1980?

16 A YES, I DID.

17 Q IF SOMEONE HAD SOME SPECIAL DIETARY NEEDS FOR
18 BREAKFAST, WHICH IS WHERE YOU WORKED, WOULD THOSE BE TAKEN
19 CARE OF?

20 A YES. THEY'D COME TO THE SPECIAL REQUEST
21 WINDOW, WHICH WAS RIGHT IN THE MAIN KITCHEN, AND I'D EITHER
22 ANSWER IT MYSELF, OR I'D BE DOING EGGS AND I'D HAVE SOMEONE
23 RIGHT NEXT TO ME ANSWER THE SPECIAL REQUEST WINDOW.

24 Q DO YOU DECREE?

25 A YES.

26 Q WHAT DOES DECREEEING MEAN TO YOU?

27 A WELL, DECREEEING IS A FORM OF PRAYER FOR ME.

28 Q WHAT EFFECT, IF ANY, DOES DECREEEING HAVE ON

1 YOU?

2 A WELL, SINCE I AM A SALESMAN, IT IS SORT OF LIKE
3 WHAT I -- I'VE DONE TO HYPE MYSELF UP IN SALES. LIKE WITH
4 DALE CARNEGIE, I WOULD GO THROUGH A PITCH TO HYPE MYSELF UP.
5 IT IS SOMETHING I USE TO CLARIFY MY MIND.

6 Q YOU EVER FELT THAT DECREERING IN ANY WAY
7 LESSENERED YOUR ABILITY TO CONTROL YOUR OWN THOUGHTS AND
8 ACTIONS?

9 A NO. IT USUALLY DOES THE OPPOSITE OF THAT.

10 Q DURING THE TIME YOU WORKED AT CAMELOT, DID YOU
11 FIND WORKING THERE TO BE SATISFACTORY?

12 A YES, IT WAS VERY UPLIFTING. I DID IT EVERY DAY
13 IN SPITE OF TAKING CARE OF MY FIVE CHILDREN. IT WAS
14 SOMETHING I ENJOYED.

15 Q DID YOU ATTEND SUMMIT UNIVERSITY?

16 A YES, I DID.

17 Q WHAT YEAR?

18 A 1976 FOR MY SECOND LEVEL AND 1974 FOR MY FIRST.

19 Q HOW WOULD YOU CHARACTERIZE YOUR EXPERIENCE AT
20 SUMMIT UNIVERSITY?

21 A IT -- IT GAVE NEW MEANING TO MY LIFE AS A
22 SINGLE PARENT AND AS AN INDIVIDUAL. JUST MAKING MY WAY IN
23 THE WORLD.

24 Q WHEN YOU ATTENDED SUMMIT UNIVERSITY, DID YOU
25 HAVE ANY CHILDREN?

26 A I HAVE FIVE CHILDREN. I WAS A SINGLE PARENT
27 FOR 12 YEARS.

28 Q WHEN YOU ATTENDED SUMMIT UNIVERSITY, HOW MANY

1 CHILDREN DID YOU HAVE THEN?

2 A I HAD FIVE CHILDREN.

3 Q WERE YOU ABLE TO TAKE CARE OF YOUR CHILDREN
4 WHEN YOU WERE ATTENDING SUMMIT UNIVERSITY?

5 A IT TOOK SOME DOING, BUT YES, I WAS ALWAYS ABLE
6 TO HAVE MY CHILDREN WITH ME.

7 Q DURING THE COURSE OF YOUR RELATIONSHIP WITH THE
8 CHURCH, HAVE YOU EVER BEEN TAUGHT NOT TO HAVE ANY
9 COMMUNICATION WITH NONCHURCH MEMBERS?

10 A NO.

11 Q HAVE YOU EVER BEEN TAUGHT TO FEAR NONCHURCH
12 MEMBERS?

13 A NO. IN THE NATURE OF MY WORK, I WAS A REALTOR
14 DURING THAT PERIOD, I HAVE ALWAYS BEEN IN COMMUNICATION WITH
15 OUTSIDE PEOPLE.

16 Q IN THE COURSE OF YOUR TIME AS A STAFF MEMBER,
17 DID YOU EVER FEEL IN ANY WAY THAT YOU WERE MANIPULATED OR
18 CONTROLLED BY CHURCH LEADERS OR ELIZABETH CLARE PROPHET?

19 A NO.

20 Q WHAT WAS THE NATURE OF YOUR RELATIONSHIP AS A
21 CHURCH MEMBER WITH ELIZABETH CLARE PROPHET?

22 A WELL, SHE WAS THE LEADER OF OUR CHURCH, SO I
23 WAS A DISCIPLE. AND SHE WAS A FRIEND OF MINE PERSONALLY AND
24 OUR CHILDREN WERE FRIENDS, SO WE WERE MOTHERS THAT CHATTED
25 BACK AND FORTH ABOUT CHILDREN AND THINGS.

26 MR. KLEIN: THANK YOU.

27 I HAVE NO FURTHER QUESTIONS.

28 MR. LEVY: I WILL TRY TO KEEP IT BRIEF, YOUR HONOR,

1 IN VIEW OF THE TIME.

3 CROSS-EXAMINATION +

4 BY MR. LEVY:

5 Q YOU ARE A COMMUNITY MEMBER NOW, ARE YOU?

6 A YES, I AM.

7 Q AND IN '76 TO '83, YOU WERE A STAFF MEMBER?

8 A THAT'S CORRECT.

9 Q WERE YOU EVER A PERMANENT STAFF MEMBER?

10 A NO, I WAS NOT.

11 Q WHY IS THAT? WERE YOU NEVER ASKED TO BE A
12 PERMANENT STAFF MEMBER?

13 A WELL, PRIMARILY BEING A SINGLE PARENT, I ALWAYS
14 HAD TO WORK OUT. I SUPPORTED MY CHILDREN BY MYSELF.

15 Q AND IF YOU WERE A STAFF MEMBER, WOULD YOU NOT
16 HAVE BEEN ABLE TO WORK OUT?

17 A NO. I JUST CHOSE -- AT THAT TIME I HAD TOO
18 MANY OBLIGATIONS WITH MY CHILDREN.

19 Q AND HOW WOULD BEING A PERMANENT STAFF MEMBER
20 HAVE INTERFERED WITH YOUR OBLIGATIONS WITH YOUR CHILDREN?

21 A THEY WOULDN'T HAVE. BUT I HAD A PROFESSION. I
22 WAS A REALTOR.

23 Q WELL, YOUR PROFESSION AS A REALTOR WAS NOT
24 INTERFERED WITH BY YOU BEING A STAFF MEMBER?

25 A NO.

26 Q HOW WOULD YOUR BEING A PERMANENT STAFF MEMBER
27 CHANGE YOUR ABILITY TO BE A REALTOR?

28 A IT WOULDN'T HAVE IF I HAD CHOSE TO BE THAT.

1 Q SO THAT -- MAYBE I AM A LITTLE CONFUSED. MAYBE
2 YOU CAN HELP.

3 YOU ARE TELLING US THAT IT WAS YOUR DECISION
4 NOT TO BE A PERMANENT STAFF MEMBER?

5 A YES.

6 Q WHY DID YOU DECIDE NOT TO BE A PERMANENT STAFF
7 MEMBER?

8 A WHY DID I NOT? IT WAS WHERE I WANTED TO BE AT
9 THE TIME.

10 Q NOW, YOU HAVE BEEN ASSOCIATED WITH THE CHURCH
11 FOR QUITE SOMETIME, RIGHT?

12 A THAT'S CORRECT. SINCE 1970.

13 Q AND USUALLY WHEN SOMEONE IS ASSOCIATED WITH A
14 RELIGIOUS ORGANIZATION, THEY KIND OF LIKE TO MOVE UP AND
15 PROGRESS IN A RELIGIOUS ORGANIZATION; IS THAT RIGHT?

16 A IF THEY WANT TO. IF THEY HAVE THAT IN MIND.

17 Q AND YOU GOT AS FAR AS YOU WANTED TO GO AND JUST
18 DECIDED THAT THAT NEXT STEP WOULD BE A LITTLE BIT TOO MUCH;
19 WOULD THAT BE A FAIR STATEMENT?

20 A NO. I JUST FELT THAT FOR MY CHILDREN
21 PRIMARILY, I WANTED A HOME. AND I FELT -- THEY WERE
22 TEENAGERS AT THE TIME AND YOUNGER, THAT I FELT WE SHOULD
23 HAVE A HOME.

24 Q IF YOU WERE PERMANENT STAFF, WOULD YOU BE
25 DENIED THE RIGHT TO HAVE A HOME?

26 A NOT AT ALL. I COULD HAVE HAD A HOME ON THE
27 COMMUNITY PROPERTY, BUT I CHOSE TO HAVE A HOME OFF.

28 Q DO THEY HAVE INDIVIDUAL HOUSING, BIG HOMES FOR

1 EACH OR NORMAL SIZE HOMES FOR EACH FAMILY AND FAMILY MEMBERS
2 WHEN YOU ARE ON PERMANENT STAFF?

3 A WELL, SINCE I AM NOT ON PERMANENT STAFF, I
4 HAVEN'T HANDLED THAT SITUATION. BUT I DO BELIEVE THAT THERE
5 IS ADEQUATE HOUSING FOR PERMANENT STAFF MEMBERS WITH
6 FAMILIES.

7 Q HAVE YOU VISITED CAMELOT?

8 A YES.

9 Q ARE THERE INDIVIDUAL HOMES FOR FAMILIES?

10 A ONE OF THE THINGS WHICH I DID AS A REALTOR
11 IS --

12 Q EXCUSE ME, MA'AM. THAT IS AN EASY ONE. THAT
13 IS A YES OR NO.

14 ARE THERE SEPARATE HOMES FOR FAMILIES?

15 MR. KLEIN: I AM GOING TO OBJECT AS VAGUE AND
16 AMBIGUOUS AS TO THE TIME PERIOD WE ARE TALKING ABOUT, YOUR
17 HONOR.

18 THE COURT: WHEN DID YOU VISIT CAMELOT?

19 THE WITNESS: I VISITED CAMELOT WHEN WE FIRST
20 ACQUIRED THE PROPERTY.

21 THE COURT: APPROXIMATELY WHEN WAS THAT?

22 THE WITNESS: '78.

23 THE COURT: WERE YOU INVOLVED IN THE ACQUISITION OF
24 THE PROPERTY?

25 THE WITNESS: NO.

26 THE COURT: ALL RIGHT. WELL, IN '78 OR THEREABOUTS,
27 WHEN YOU VISITED CAMELOT, WERE THERE SEPARATE RESIDENCES FOR
28 FAMILIES?

1 THE WITNESS: YES. BUT NOT ON THE IMMEDIATE
2 PROPERTY. THERE WAS HOUSING OFF THE IMMEDIATE PROPERTY.

3 THE COURT: GO AHEAD.

4 Q BY MR. LEVY: IF YOU HAD A FAMILY AND YOU WERE
5 A CHURCH MEMBER, TELL ME IF MY UNDERSTANDING IS CORRECT, THE
6 CHURCH WOULD PROVIDE YOU WITH A FAMILY UNIT? A HOUSE OFF --

7 A ACTUALLY, I DID LIVE WITH MY FAMILY ON OUR
8 PROPERTY FOR A WHILE AT A CAMP, CAMP VICTORY ON MULHOLLAND,
9 AND WE LIVED IN STAFF HOUSING.

10 Q WAS THAT CAMP VICTORY, IS THAT OLD HOME WHERE
11 THE BLIND CHILDREN USED TO BE?

12 A YES, IT IS.

13 Q IS THE FACT THAT CAMP VICTORY IS KIND OF LIKE
14 DORMITORIES?

15 A WE HAD PRIVATE QUARTERS. WE HAD A NICE
16 SITUATION. WE HAD TWO SPACIOUS SEPARATED ROOMS TOGETHER
17 SORT OF LIKE A SUITE MY CHILDREN AND I, ALL FIVE CHILDREN
18 FOR A PERIOD OF TIME.

19 Q ISN'T IT A FACT THAT RIGHT NEXT TO YOUR
20 SPACIOUS SUITE THERE WAS A BUS SO THAT WHEN YOU WANTED TO
21 GET SOMETHING TO EAT, YOU COULD TRAVEL ALL THE WAY TO
22 CAMELOT TO EAT IN THE CAFETERIA?

23 A NO. MANY TIMES I WOULD HELP THEM, THE
24 CHILDREN, SINCE I WAS PRIMARILY ASSOCIATED WITH MONTESSORI.
25 MY CHILDREN WERE IN MONTESSORI. WE WOULD HAVE PANCAKES AND
26 FRUIT AND MEALS RIGHT THERE.

27 Q YOU ARE TELLING US THAT THERE IS A KITCHEN AND
28 KITCHEN FACILITIES RIGHT AT CAMP VICTORY TO FEED ALL THOSE

1 PEOPLE?

2 A TO CLARIFY THAT. WE WOULD BRING IT THERE AND
3 PREPARE IT THERE.

4 Q WOULD THE BULK OF THE PEOPLE AT CAMP VICTORY
5 HAVE TO BE TRANSPORTED BY BUS TO CAMELOT IN ORDER TO HAVE
6 THEIR MEALS?

7 A I DON'T KNOW. I JUST KNOW THAT THE BULK OF OUR
8 ACTIVITY HAPPENED AT CAMELOT.

9 Q WOULD IT BE A FAIR STATEMENT THAT WHAT HAPPENED
10 AT CAMP VICTORY IS THAT THERE WERE SOME DORMITORIES FOR
11 SLEEPING AND THAT MOST OF THE ACTIVITIES THAT HAPPENED WITH
12 REGARD TO THE CHURCH REQUIRED TRANSPORTATION BY BUS TO
13 CAMELOT?

14 A ALL THAT I WOULD HAVE FOCUSED ON WAS WHAT THE
15 MONTESSORI CHILDREN DID AND IT WAS BOTH WAYS.

16 Q NOW, THIS KITCHEN JOB THAT YOU SAID YOU HAD,
17 WAS THAT AT CAMP VICTORY OR WAS THAT AT CAMELOT?

18 A IT WAS AT CAMELOT, BUT SOMETIMES I'D HELP THEM
19 WHERE THEY FIXED MEALS FOR THE CHILDREN AT CAMP VICTORY. I
20 LIVED THERE.

21 Q HOW FAR WAS CAMELOT FROM CAMP VICTORY?

22 A I WOULD GUESS ALONG THE COAST MAYBE 12 MILES,
23 10 MILES.

24 Q UP IN THE HILLS UP IN --

25 A IT IS NEAR LEO CARRILLO BEACH.

26 Q AND YOU WOULD HAVE TO TAKE A BUS TRIP. ABOUT
27 HOW LONG WOULD THE BUS TRIP TAKE TO GET FROM CAMP VICTORY TO
28 CAMELOT?

1 A I DON'T KNOW. FIFTEEN MINUTES. SOMETIMES I
2 TOOK MY CAR SO I VERY SELDOM WENT IN THE BUS.

3 Q TWELVE MILES THROUGH HILLY COUNTRYSIDE AND YOU
4 COULD MAKE IT IN FIFTEEN MINUTES?

5 A YOU GO ALONG THE BEACH, GO ALONG THE COAST.

6 Q THE ENTRANCE TO CAMELOT IS OFF OF MULHOLLAND
7 DRIVE; IS IT NOT?

8 A YES, BUT YOU CAN GO ALONG THE COAST AND GO UP.

9 Q HOW MANY MILES IS IT FROM PACIFIC COAST HIGHWAY
10 ON THE COAST UP LAS VIRGENES ROAD UNTIL YOU GET TO
11 MULHOLLAND?

12 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
13 THE RELEVANCY OF THIS.

14 THE COURT: OVERRULED.

15 THE WITNESS: I HAVEN'T MEASURED IT.

16 Q BY MR. LEVY: HOW ABOUT EIGHT OR TEN? WOULD
17 THAT BE AN ACCURATE GUESS?

18 A MAYBE FIVE TO EIGHT. I DON'T KNOW.

19 Q AND YOU JUST ZIPPED ALONG THERE AND GOT THERE
20 IN 15 MINUTES, YOU COVERED THE WHOLE 12 MILES?

21 A WELL, I MYSELF IN MY CAR, I WAS --

22 Q HOW ABOUT THE BUS WITH THE CHILDREN AND THE
23 OTHER PEOPLE FROM THE SCHOOL?

24 A USUALLY MY CHILDREN WERE IN MY CAR OR ELSE THEY
25 WERE IN THE BUS. IT WASN'T A PROBLEM.

26 Q I IMAGINE IT WASN'T A PROBLEM.

27 NOW, YOU TOLD US ABOUT AT SUMMIT UNIVERSITY
28 WHEN YOU WOULD HAVE ALL THESE LUNCHEON MEETINGS WITH MR.

1 MULL.

2 A YES.

3 Q WERE YOU AWARE OF THE CODE OF CONDUCT AT THAT
4 TIME?

5 A I WAS SITTING WITH MY DAUGHTER HAVING LUNCH.

6 Q WERE YOU AWARE OF THE CODE OF CONDUCT AT THAT
7 TIME?

8 A I WAS ALSO AWARE OF THE CODE OF CONDUCT.

9 Q DID THE CODE OF CONDUCT NOT SAY THAT YOU WERE
10 NOT TO ENGAGE IN CONVERSATIONS OF A PERSONAL NATURE WHILE
11 STUDENTS WERE ATTENDING SUMMIT UNIVERSITY?

12 A WE WERE SHARING THE TEACHINGS. THAT WASN'T
13 THAT PERSONAL IN NATURE.

14 Q NOW, ON THE OCCASION THAT YOU VISITED GREGORY
15 MULL'S HOME, SAY IF I REMEMBER CORRECTLY, YOU TOLD ME THAT
16 MR. MULL INVITED YOU TO HIS HOME?

17 A YES.

18 Q WHEN YOU WENT TO HIS HOME, HOW MANY OF YOUR
19 CHILDREN DID YOU BRING WITH YOU?

20 A ONE.

21 Q JUST ONE. AND IF I REMEMBER, YOU SAID MR. MULL
22 HAD HIS DAUGHTER LINDA TAKE YOUR CHILD OUT OF THE ROOM?

23 A NO. LINDA WAS BABY-SITTING MY DAUGHTER AROUND
24 THE GROUNDS AND WE WERE UP IN THE PATIO.

25 Q NOW, WAS THE COURSE OF CONVERSATION ONE ABOUT
26 SEXUAL DISCLOSURES BETWEEN YOURSELF AND MR. MULL AT THAT
27 TIME?

28 A I DON'T KNOW WHAT YOU MEAN.

1 Q WELL, APPARENTLY YOU TOLD US MR. MULL
2 VOLUNTEERED THE INFORMATION THAT HE HAD BEEN A HOMOSEXUAL?

3 A HE DID.

4 Q AND DID YOU VOLUNTEER ANY INFORMATION ABOUT
5 YOUR SEXUAL PAST?

6 A I DIDN'T HAVE ANYTHING UNUSUAL TO VOLUNTEER. I
7 HAD BEEN MARRIED FOR 12 YEARS.

8 Q YOU WERE TALKING ABOUT JAM AND MARMALADE. AND
9 THEN IN THE MIDDLE OF THAT CONVERSATION, HE SAID, "GUESS
10 WHAT"; IS THAT THE WAY THE CONVERSATION WENT?

11 A NOT TO MY RECOLLECTION.

12 Q WHY DON'T YOU TELL US EXACTLY HOW THE
13 CONVERSATION DID GO.

14 A WELL, WE WERE SHARING -- WE WERE TALKING ABOUT
15 THE CLASS. WE HAD JUST LEFT SHASTA AND COME DOWN TO SAN
16 FRANCISCO. AND WE WERE DISCUSSING THE TEACHINGS THAT HAD
17 TRANSPIRED. AND HE WAS TELLING ME HOW MUCH IT UPLIFTED HIM.
18 AND THEN IN TELLING ME HOW MUCH IT UPLIFTED HIM, HE WAS
19 TELLING ME WHAT A PROBLEM HE HAD HAD PRIOR TO THAT.

20 Q AND HE HAD KATHLEEN HAMMOND RIGHT OUTSIDE IN
21 THE WINGS FOR YOU TO GO DOWN AND SHE COULD CONFIRM THAT FOR
22 YOU?

23 A KATHLEEN LIVED THREE OR FOUR HOUSES AWAY ON THE
24 SAME BLOCK. THE CHILDREN HAD WALKED DOWN THERE DURING OUR
25 CONVERSATION.

26 Q I THOUGHT YOU ONLY HAD ONE CHILD THERE.

27 A HE HAD A CHILD, TOO.

28 Q OH, I SEE.

1 A AND SHE HAD TWO CHILDREN.

2 Q SO ALL THE CHILDREN WENT OVER TO ONE SIDE, AND
3 THEN YOU AND GREGORY GOT TO TALK ABOUT SEXUAL THINGS?

4 A YES.

5 Q HOW LONG DID YOU STAY ON THAT VISIT?

6 A OH, I'D SAY SEVERAL DAYS.

7 Q DIDN'T YOU STAY A WEEK?

8 A IT IS NOT MY RECOLLECTION I STAYED THAT LONG.

9 Q DIDN'T YOU STAY A WEEK; AND DURING THE COURSE
10 OF THE TIME YOU STAYED THERE, DIDN'T YOU GET RATHER FRIENDLY
11 WITH MR. MULL?

12 A WELL, I CAN SAY THAT HE NEVER HELD MY HAND. I
13 DON'T KNOW HOW FRIENDLY THAT WOULD BE.

14 Q DID HE HOLD ANYTHING ELSE?

15 A NO.

16 Q SO THERE WAS NO REASON FOR YOU TWO, IF THIS WAS
17 ALL A DISCUSSION ABOUT THE CHURCH AND UPLIFTING THINGS, TO
18 DISCUSS SEX, WAS THERE?

19 A WELL, I DON'T KNOW WHAT YOU ARE ASKING ME. I
20 JUST TOLD YOU WE DID. I DIDN'T THINK MY LIFE WAS VERY
21 UNUSUAL.

22 Q YOU STAYED THERE A WEEK, AND DURING THE COURSE
23 OF THE WEEK THAT YOU WERE THERE OR APPROXIMATELY --

24 A I DIDN'T SAY I STAYED THERE A WEEK, SIR.

25 Q AT LEAST SEVERAL DAYS?

26 A I SAID SEVERAL DAYS.

27 Q DID MR. MULL MAKE ANY OTHER DISCLOSURES TO YOU?

28 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND

1 AMBIGUOUS AS TO WHAT HE MEANS BY "DISCLOSURE," YOUR HONOR.

2 THE COURT: OVERRULED.

3 THE WITNESS: I DON'T KNOW WHAT YOU MEAN.

4 Q BY MR. LEVY: DID MR. MULL TELL YOU ANYTHING
5 ELSE ABOUT HIS PERSONAL LIFE?

6 A WELL, HE WENT ON QUITE A BIT ABOUT ANALYSIS.
7 HE THOUGHT IT WAS A VERY GOOD THING. I DIDN'T KNOW ANYBODY
8 WHO HAD BEEN THROUGH ANALYSIS BEFORE.

9 Q WAS THERE ANYTHING ELSE THAT YOU REMEMBERED
10 THAT YOU TALKED ABOUT EXCEPT HIS DISCLOSURE ABOUT THE
11 HOMOSEXUALITY TO YOU?

12 A I TOLD YOU WE TALKED A LOT ABOUT THE TEACHINGS
13 AND WE WERE SHARING WHAT OUR -- HOW OUR PERSONAL LIVES WERE
14 CHANGING.

15 Q NOW, PRIOR TO THIS VISIT THAT YOU HAD AT HIS
16 HOME, WOULD YOU DESCRIBE YOURSELF AS CLOSE FRIENDS?

17 A YES. WE WERE FRIENDS. I DON'T KNOW HOW CLOSE
18 WE WERE. I HAD ONLY KNOWN HIM THREE MONTHS, FOUR MONTHS.

19 MR. LEVY: I THINK I MISINFORMED THE COURT. I SAID
20 THIS WAS GOING TO BE FAIRLY BRIEF. IT IS 4:15. WHATEVER
21 THE COURT DESIRES. I CAN CONTINUE OR TERMINATE.

22 THE COURT: WE WILL RESUME ON MONDAY MORNING AT 9:15.
23 HAVE A VERY PLEASANT WEEKEND. REMEMBER THE COURT'S
24 ADMONITIONS.

25 (AT 4:16 P.M., AN ADJOURNMENT WAS TAKEN
26 UNTIL MONDAY, MARCH 10, 1986, AT
27 9:15 A.M.)
28