

COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT

CHURCH UNIVERSAL & TRIUMPHANT,)
INC., A MONTANA CORPORATION,)
)
PLAINTIFF, CROSS-DEFENDANT)
AND APPELLANT;)
)
ELIZABETH CLARE PROPHET,)
)
CROSS-DEFENDANT AND APPELLANT,)
)
VS.) SUPERIOR COURT
) NO. C 358191
)
GREGORY MULL,)
)
DEFENDANT, CROSS-COMPLAINANT)
AND RESPONDENT.)
)

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

APPEARANCES:

FOR THE PLAINTIFF,
CROSS-DEFENDANTS AND
APPELLANTS:

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

FOR THE DEFENDANT,
CROSS-COMPLAINANT AND
RESPONDENT:

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

-AND-

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

COPY

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

1 LOS ANGELES, CALIFORNIA; MONDAY, MARCH 10, 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
8 ANNE COURTRIGHT, +

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

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

14 THE WITNESS: MY NAME IS ANNE COURTRIGHT.

15 THE CLERK: THANK YOU.

16 THE COURT: PLEASE PROCEED.

17 MR. LEVY: THANK YOU, YOUR HONOR.

18 GOOD MORNING, LADIES AND GENTLEMEN.

19
20 CROSS-EXAMINATION + (RESUMED)

21 BY MR. LEVY:

22 Q DO YOU PREFER COURTRIGHT OR KURTH OR NOTTOLI OR
23 WHICH ONE?

24 A MY NAME IS ANNE COURTRIGHT.

25 Q IT IS COURTRIGHT NOW. OKAY.

26 THURSDAY WAS WHEN WE WERE CONCLUDING, YOU HAD
27 TOLD US ABOUT THE TWO SPACIOUS ROOMS AT CAMP VICTORY THAT
28 WAS SOMEWHAT LIKE A SUITE OF ROOMS, OUTSIDE OF WHICH YOU GOT

1 BREAKFAST FOR YOUR CHILDREN.

2 AND YOU TOLD US HOW YOU DROVE THAT 20 MILES
3 THROUGH MOUNTAINOUS ROADS IN SOME FIVE OR TEN MINUTES TO GET
4 TO CAMELOT TO HAVE BREAKFAST WITH YOUR CHILDREN; IS THAT
5 CORRECT?

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

8 THE COURT: OVERRULED.

9 THE WITNESS: TO MY RECOLLECTION, THAT WASN'T EXACTLY
10 WHAT WAS STATED.

11 Q BY MR. LEVY: DO YOU WANT TO TELL ME HOW FAR IT
12 WAS FROM CAMP VICTORY TO CAMELOT?

13 A WELL, THE SIGNIFICANT THING IS --

14 Q DO YOU WANT THE TELL ME HOW FAR IT WAS FROM
15 CAMP VICTORY TO CAMELOT?

16 A I ONLY WAS THERE FOR SIX WEEKS. IT IS A LITTLE
17 BIT DIFFICULT TO REMEMBER OUT OF SEVEN YEARS OF STAFF LIFE
18 EXACTLY HOW FAR IT IS.

19 Q WELL, YOU DROVE IT EVERY DAY, DIDN'T YOU?

20 A FOR SIX WEEKS OUT OF SEVEN YEARS.

21 Q DO YOU RECALL HOW FAR IT WAS?

22 A NO, I DO NOT RECALL, SIR.

23 Q AND YOU WERE ABLE TO DRIVE IT IN, WHAT, FIVE,
24 TEN, FIFTEEN MINUTES?

25 A I DON'T BELIEVE THAT WAS WHAT I SAID, SIR.

26 Q DO YOU RECALL HOW LONG IT WOULD TAKE YOU TO
27 DRIVE THE DISTANCE?

28 A WELL, I WAS GUESSTIMATING.

1 Q AND HOW LONG WOULD YOU GUESSTIMATE?

2 A HOW LONG WOULD I OR DID I?

3 Q DO YOU WANT TO TRY TO ANSWER MY QUESTION,
4 MA'AM? I'D LIKE TO KNOW IF YOU RECALL HOW LONG IT TOOK YOU
5 TO DRIVE FROM CAMP VICTORY TO CAMELOT.

6 A WELL, I BELIEVE THAT THURSDAY I STATED IN THE
7 NEIGHBORHOOD OF 15 TO 20 MINUTES IN MY CAR.

8 Q OKAY. NOW, DO YOU HAVE ANY CURRENT
9 RECOLLECTION OF HOW FAR IT WAS FROM CAMP VICTORY TO CAMELOT?

10 A NO.

11 Q YOU WERE THERE FOR SIX WEEKS?

12 A UH-HUH.

13 Q YOU TOLD US IN 1974, YOU ATTENDED YOUR FIRST
14 QUARTER AT SUMMIT UNIVERSITY?

15 A THAT'S CORRECT.

16 Q AND WHERE WAS IT YOU ATTENDED YOUR FIRST
17 QUARTER?

18 A SANTA BARBARA.

19 Q HOW MANY CHILDREN DID YOU HAVE AT THAT TIME?

20 A FIVE.

21 Q AND DID YOU TAKE THE FIVE CHILDREN TO THE
22 QUARTER WITH YOU?

23 A YES, I DID.

24 Q NOW, WHEN YOU WERE AT THE QUARTER, YOU ALSO
25 TOLD US YOU OBEYED AND FOLLOWED DICTATES AND CODE OF
26 CONDUCT; IS THAT CORRECT?

27 A THAT'S CORRECT.

28 Q HOW OLD WAS YOUR DAUGHTER AT THAT TIME?

1 A I HAVE THREE DAUGHTERS. WHICH DAUGHTER?

2 Q THE YOUNGEST ONE.

3 A ABOUT ONE AND A HALF.

4 Q YOU ALSO TOLD US THEN THAT YOU FOLLOWED THE
5 DIETARY PLAN. I AM READING FROM THE CODE OF CONDUCT ON PAGE
6 15, AND IT SAYS: (READING.)

7 "THEY ARE REQUIRED TO MAINTAIN
8 A VEGETARIAN DIET PARTAKING NEITHER OF MEAT,
9 FISH NOR FOUL. DAIRY PRODUCTS ARE ALLOWED."

10 WAS YOUR ONE AND A HALF YEAR OLD DAUGHTER A
11 VEGETARIAN AT THAT TIME?

12 MR. KLEIN: YOUR HONOR, I WOULD OBJECT THAT THERE IS
13 AN ADDITIONAL PART OF THAT PAGE 15 THAT TALKS ABOUT
14 EXCEPTIONS THAT SHOULD BE READ IF YOU ARE GOING TO ASK
15 QUESTIONS OF THIS WITNESS.

16 THE COURT: SUSTAINED.

17 Q BY MR. LEVY: WAS YOUR ONE AND A HALF YEAR OLD
18 DAUGHTER A VEGETARIAN AT THAT TIME?

19 A WE WERE VEGETARIANS FOR SEVEN YEARS PRIOR TO
20 COMING TO S.U.

21 Q AND DID YOUR CHILDREN FAST ALONG WITH YOU ON
22 THE FASTING DAYS?

23 A SOMETIMES YES, SOMETIMES NO. DEPENDED ON
24 THEIR -- HOW I FELT THEY WOULD DO. USUALLY NO.

25 Q NOW, I BELIEVE YOU SAID YOU WENT TO A
26 CONFERENCE IN 1975 AND THE CONFERENCE WAS AT SHASTA; IS THAT
27 CORRECT?

28 A YES.

1 Q WAS MR. MULL AT THE CONFERENCE AT SHASTA?

2 A YES.

3 Q WAS IT THERE THAT HE INVITED YOU TO VISIT HIM
4 IN SAN FRANCISCO?

5 A YES.

6 Q DO YOU RECALL APPROXIMATELY WHAT MONTH IT WAS
7 THAT YOU VISITED MR. MULL IN SAN FRANCISCO?

8 A WELL, THE CONFERENCE WAS IN JULY.

9 Q AND DID YOU HAVE ALL FIVE OF YOUR CHILDREN WITH
10 YOU WHEN YOU VISITED HIM?

11 A NO. MY OTHER CHILDREN WENT WITH OTHER FRIENDS
12 BACK TO MICHIGAN FOR -- TO VISIT THEIR GRANDPARENTS FOR
13 SEVERAL WEEKS.

14 Q NOW, I FORGET WHAT YOU TOLD US THE PURPOSE OF
15 THE VISIT WAS TO WHEN YOU WENT TO VISIT MR. MULL.

16 A WE WERE STOPPING OVER EN ROUTE DOWN TO SANTA
17 BARBARA.

18 Q YOU WERE GOING BACK TO CHURCH HEADQUARTERS THEN
19 IN SANTA BARBARA?

20 A NO. I HAD A HOME.

21 Q YOU HAD A HOME IN SANTA BARBARA. SO CLARIFY
22 FOR ME ONE MORE TIME, HOW LONG DID YOU STAY ON YOUR VISIT
23 WITH MR. MULL?

24 A SEVERAL DAYS.

25 Q AND HOW MANY IS "SEVERAL"?

26 A I DON'T KNOW. THREE OR FOUR.

27 Q THAT WAS A LONG TIME AGO, ALSO?

28 A IT WAS.

1 Q WOULD I BE CORRECT IN ASSUMING THAT YOU REALLY
2 DON'T REMEMBER HOW LONG YOU STAYED THERE?

3 A NO.

4 Q COULD HAVE BEEN THREE, COULD HAVE BEEN FOUR,
5 COULD HAVE BEEN SIX, COULD HAVE BEEN FIVE?

6 A WELL, THERE ARE REASONS I HAD TO GO BACK HOME.

7 Q I APPRECIATE THAT. WHAT I AM INQUIRING ABOUT
8 IS HOW LONG YOU STAYED THERE.

9 A TO MY RECOLLECTION, SEVERAL DAYS, THREE TO FOUR
10 DAYS.

11 Q THERE WAS -- THE REASONS FOR HAVING TO GO BACK
12 HOME ARE NOT PRESSING ENOUGH TO JUST STOP OVERNIGHT?

13 A SOMEONE ELSE WAS DRIVING SOME FURNITURE DOWN
14 FOR ME FROM MICHIGAN AND I WAS WAITING FOR THEM TO GET THEIR
15 TRUCK DOWN.

16 Q AND THEY WERE IN COMMUNICATION WITH YOU WHILE
17 YOU WERE AT GREGORY MULL'S HOME?

18 A WELL, GREGORY MULL'S PLACE WAS A TEACHING STUDY
19 GROUP. MANY PEOPLE WERE DOING WHAT I WAS DOING. THERE WAS
20 QUITE A FEW PEOPLE CONGREGATING THERE.

21 Q THAT IS NICE.

22 WERE YOU IN CONTACT WITH THE PEOPLE FROM -- WHO
23 WERE DRIVING FROM MICHIGAN WHILE YOU WERE AT GREGORY'S HOME?

24 A I DON'T RECALL. THEY WERE ON THE ROAD, I WAS
25 ON THE ROAD. I KNEW WE HAD MADE ARRANGEMENTS.

26 Q ALL I AM TRYING TO FIND OUT IS HOW YOU
27 COORDINATED WITH THE PEOPLE FROM MICHIGAN SO THAT YOU WOULD
28 ARRIVE AT YOUR HOME IN SANTA BARBARA WHEN THEY GOT THERE

1 FROM MICHIGAN.

2 A OTHER PEOPLE LIVED IN MY HOME. IT WAS A
3 COMMUNITY HOME.

4 Q SO THAT THERE WAS THEN NO GREAT RUSH TO GET
5 THERE BECAUSE IF THEY GOT THERE BEFORE YOU, SOMEBODY WOULD
6 BE THERE TO LET THEM IN?

7 A I AM SORRY, BUT I CAN'T QUITE RECOLLECT ALL THE
8 INCIDENCES OF THESE OTHER PEOPLE.

9 Q LET'S SEE IF YOU CAN RECOLLECT. YOU TOLD US
10 ABOUT SOME DISCLOSURES MR. MULL MADE TO YOU. I WONDER IF
11 YOU WOULD BE KIND ENOUGH TO REPEAT THAT, HOW THAT STORY WENT
12 ABOUT WHEN YOU WERE GETTING READY TO LEAVE GREGORY'S HOME.

13 A COULD YOU REPHRASE IT? I DON'T KNOW WHAT YOU
14 ARE ASKING ME.

15 Q WELL, LAST THURSDAY YOU TESTIFIED THAT ON THE
16 DAY YOU WERE LEAVING GREGORY'S HOME, YOU HAD A CONVERSATION
17 WITH HIM.

18 A THAT IS CORRECT.

19 Q I WONDER IF YOU'D BE KIND ENOUGH TO TELL US
20 WHAT THE CONVERSATION WAS, AND WHAT THE SEQUENCE OF EVENTS
21 THAT LED UP TO THE CONVERSATION AND WHAT SEQUENCE OF EVENTS
22 OCCURRED THEREAFTER.

23 A THE -- THE MORNING I WAS LEAVING, GREGORY ASKED
24 ME TO HAVE TEA WITH HIM OR WHATEVER -- TEA OR COFFEE, I
25 DON'T KNOW WHAT -- ON HIS PATIO. AND I WAS GETTING ALL MY
26 THINGS READY TO LEAVE.

27 AND CHRISTINE, MY DAUGHTER, WAS WITH ME, AND
28 LINDA WAS GOING TO BABY-SIT HER AND WE HAD A CONVERSATION ON

1 THE PATIO.

2 Q AND WHAT -- LINDA WAS GOING TO BABY-SIT YOUR
3 DAUGHTER. YOU WERE GETTING READY TO LEAVE.

4 WAS YOUR DAUGHTER GOING TO TAKE A NAP OR GO OUT
5 AND PLAY BEFORE YOU LEFT?

6 A PROBABLY BOTH. SHE WAS LITTLE.

7 Q AND LINDA WAS GOING TO TAKE CARE OF HER
8 IMMEDIATELY BEFORE YOU LEFT?

9 A THAT'S CORRECT.

10 Q I ASSUME SHE WAS GOING TO ESCORT HER OUT TO THE
11 CAR OR SOMETHING?

12 A NO. I WAS PROBABLY GOING TO FETCH HER. I
13 DON'T KNOW WHAT YOU ARE SAYING.

14 Q WELL, I AM TRYING TO FIND OUT FROM YOU WHAT
15 TRANSPIRED ON THAT LAST DAY.

16 SO YOU WERE OUT ON THE PATIO, YOU WERE HAVING A
17 CUP OF TEA OR COFFEE WITH MR. MULL?

18 A THAT IS CORRECT.

19 Q AND LINDA WAS BABY-SITTING YOUR DAUGHTER?

20 A THAT IS CORRECT.

21 Q DO YOU REMEMBER WHAT TIME OF DAY THIS WAS?

22 A I'D SAY MIDMORNING.

23 Q WERE THERE ANY OTHER PEOPLE AROUND THE HOUSE?

24 A WELL, THERE WAS AN AWFUL LOT OF PEOPLE BECAUSE
25 THERE IS A LOT OF PEOPLE WERE THERE FROM THE CONFERENCE
26 DOING WHAT I WAS DOING, TRAVELING SOUTH.

27 Q AND YOU WERE USING MR. MULL'S HOME AS A SORT OF
28 STOPOVER ON YOUR WAY SOUTH?

1 A MANY PEOPLE WERE, YES.

2 Q NOW, YOUR DAUGHTER AT THAT TIME WAS, WHAT, ONE
3 AND A HALF OR TWO YEARS OLD?

4 A NO. SHE WAS TWO AND A HALF -- TWO, TWO AND A
5 HALF. NOT QUITE TWO AND A HALF.

6 Q SHE WAS ONE AND A HALF IN 1974?

7 A IN SEPTEMBER AND HER BIRTHDAY WAS IN FEBRUARY.

8 Q AND THIS WAS IN JULY SO SHE WAS ABOUT A LITTLE
9 BIT OVER TWO?

10 A UH-HUH.

11 Q WHAT TIME HAD YOU PLANNED TO LEAVE MR. MULL'S
12 HOME THAT DAY?

13 A PROBABLY MIDMORNING.

14 Q AND YOU TOLD US YOU WERE HAVING TEA WITH HIM
15 ABOUT MIDMORNING?

16 A UH-HUH.

17 Q NOW, WHAT DID LINDA DO WITH YOUR DAUGHTER?

18 A SHE ENTERTAINED HER.

19 Q AND WHERE --

20 A AND PART OF THE TIME SHE HAD FRIENDS SEVERAL
21 DOORS DOWN WITH KATHLEEN MULL'S -- KATHLEEN HAMMOND'S
22 CHILDREN AND THEY WENT OUT, SHE TOOK HER DOWN THERE.

23 Q AND WHILE YOU WERE HAVING TEA OR COFFEE OR
24 WHATEVER IT WAS WITH MR. MULL, YOU WANT TO TELL US WHAT THE
25 CONVERSATION INCLUDED?

26 A WELL, WE WERE SHARING THE DICTATIONS AND WHAT
27 HAD TRANSPIRED AT THE CLASS. IT HAD BEEN A LONG CLASS AND
28 IT -- A LOT HAD HAPPENED. WE HAD LEARNED A LOT. AND WE

1 WERE TRYING TO INCORPORATE WHAT WE LEARNED INTO OUR LIVES.
2 WE WERE FINDING SIMILES AND WAYS IN WHICH WE UNDERSTOOD THE
3 TEACHINGS.

4 AND AT THAT TIME GREGORY TOLD ME THAT HE HAD
5 GONE THROUGH ANALYSIS, AND HE HAD BEEN A HOMOSEXUAL AND THAT
6 THE TEACHINGS WERE CURING HIM. AND I THOUGHT THAT WAS
7 GREAT.

8 Q AND THEN WHAT HAPPENED?

9 A AND THEN WE TALKED SOME MORE ABOUT THE
10 TEACHINGS. WE WERE VERY EXCITED ABOUT EVERYTHING AND THEN I
11 WANTED TO GET GOING.

12 AND THEN I WENT TO COLLECT ALL MY BELONGINGS.
13 AND I WASN'T AWARE THAT LINDA WAS GOING TO TAKE CHRISTINE
14 DOWN, BUT THEN I WAS INFORMED SHE HAD TAKEN CHRISTINE TO THE
15 HAMMONDS' HOUSE. SO IT WAS SEVERAL DOORS AWAY AND I WALKED
16 DOWN.

17 Q AND WHAT TRANSPIRED WHEN YOU WALKED DOWN?

18 A WELL, I WALKED DOWN AND ALL THE CHILDREN WERE
19 HAVING FUN. THERE WERE SEVERAL AGE LEVELS THERE. KATHLEEN
20 HAD TWO GIRLS, AND GREGORY HAD HIS GIRL, AND I HAD MY LITTLE
21 GIRL AND THEY WERE ALL PLAYING WITH HER. AND I JUST SAT AND
22 CHATTED WITH HER LIKE A MOTHER, COMPARING OUR NOTES. IT WAS
23 KATHLEEN'S FIRST CONFERENCE.

24 WE WERE TALKING ABOUT THE TEACHINGS. AND THEN
25 OUT OF THE BLUE SHE SAID, "YOU KNOW, I'VE BEEN -- I'VE BEEN
26 SEEING HIM FOR A LONG TIME AND IT HASN'T BEEN EASY." I
27 DIDN'T KNOW HER PARTICULARLY. I MET HER AT THE CONFERENCE.
28 AND SHE SAID THAT -- SHE SAID, "DID HE TELL YOU HE WAS GAY?"

1 AND I SAID, "YES."

2 SHE SAID, "WELL, IT'S NOT BEEN EASY. I REALLY
3 CARE FOR HIM AND I'VE HAD TO DEAL WITH A LOT OF PROBLEMS."

4 BUT SHE WAS ALSO SAYING HOW MUCH THE TEACHINGS
5 HAD HELPED HIM. AND SHE SAID THAT IN THE BEGINNING WHEN SHE
6 FIRST MET HIM, THAT, YOU KNOW, HE HAD LIKED HER AND THEN
7 THERE WAS ANOTHER MAN HE LIKED AS WELL. AND SHE -- YEAR BY
8 YEAR, EVENTUALLY HIS LIFE STRAIGHTENED OUT.

9 AND WE TALKED ABOUT OTHER THINGS AND --

10 Q WAS THIS BEFORE OR AFTER YOU ASKED GREGORY MULL
11 TO MARRY YOU?

12 A I DON'T KNOW WHAT YOU ARE REFERRING TO.

13 Q ARE YOU AWARE THAT MR. MULL TALKED TO ELIZABETH
14 CLARE PROPHET ABOUT YOUR PROPOSAL?

15 A ABOUT MY PROPOSAL?

16 Q YES, MA'AM. ABOUT YOUR PROPOSAL TO GREGORY
17 MULL.

18 A NO, I AM NOT AWARE.

19 Q NOW, WAS THERE A TIME THAT YOU AND MR. MULL
20 OCCUPIED ROOMS IN A MOTEL?

21 A NO.

22 Q NOT THE SAME ROOM, BUT SEPARATE ROOMS?

23 A NOT THAT I AM AWARE OF.

24 Q ARE YOU AWARE THAT MR. MULL TALKED TO ELIZABETH
25 CLARE PROPHET ABOUT IT AND SHE TOLD HIM TO BEWARE OF THE
26 APPEARANCE OF EVIL?

27 A NO, I AM NOT AWARE OF ANY OF THIS. I
28 SHOULDN'T -- I MEAN I DON'T KNOW WHY I WOULD BE AWARE OF

1 THIS. PERHAPS YOU WERE REFERRING WHEN WE WOULD GO TO
2 CONFERENCES. WE ALL WERE IN MOTELS, 5- OR 6- OR 700 PEOPLE
3 WERE IN A MOTEL. THAT IS THE ONLY THING I CAN THINK YOU ARE
4 REFERRING TO.

5 Q WHEN YOU BECOME A STAFF MEMBER, IS THERE A
6 TEACHING WITH REGARD TO THE KARMIC HAMMER: THE MORE
7 INVOLVED YOU BECOME, THE HARDER YOU FALL IF YOU VIOLATE THE
8 TENETS OF THE CHURCH?

9 A I'M NOT SURE OF WHAT YOU ARE SPECIFICALLY
10 REFERRING TO.

11 Q WELL, DID YOU LEARN ANYTHING WHEN YOU WENT
12 THROUGH SUMMIT WITH REGARD TO A KARMIC HAMMER?

13 A THE TERM IS NOT A TERM I RECOLLECT.

14 Q YOU NEVER HEARD THAT IN ALL YOUR TIME WITH THE
15 CHURCH?

16 A I CAN'T SAY I HAVE, I CAN'T SAY I HAVEN'T. I
17 AM SAYING IT IS NOT A TERM THAT IS FAMILIAR WITH ME.

18 Q DID YOU EVER HEAR THE TERM THE SECOND DEATH?

19 A YES, I HAVE.

20 Q WELL, DON'T THEY GENERALLY GO SOMEWHAT
21 TOGETHER? IF YOU VIOLATE THE TENETS OF THE CHURCH, THE
22 KARMIC HAMMER CAN FALL ON YOU. AND IF YOU DO IT TO SUCH A
23 DEGREE THAT IT VIOLATES OR JEOPARDIZES ANYTHING TO DO WITH
24 THE CHURCH, YOU MAY EVEN SUFFER THE SECOND DEATH; ISN'T THAT
25 PART OF YOUR TEACHINGS?

26 A THAT IS NOT EXACTLY THE WAY IT IS PORTRAYED.

27 Q I IMAGINE IT IS NOT EXACTLY, BUT --

28 A IT IS A LITTLE BIT DISTORTED.

1 Q LITTLE BIT DISTORTED.

2 NOW, ISN'T IT ALSO PART OF YOUR TEACHINGS THAT
3 THOSE PEOPLE WHO ARE NOT IN THE CHURCH ARE EITHER THE DARK
4 ONES OR THE FALLEN ONES, AND YOU DON'T REALLY HAVE TO
5 COMMUNICATE WITH THEM, OR YOU CAN BE DECEITFUL, OR YOU CAN
6 BE DECEPTIVE, OR YOU CAN TWIST, OR YOU CAN TURN, OR YOU CAN
7 JUST DAMN RIGHT LIE, CAN'T YOU?

8 A I DON'T KNOW WHAT QUESTION YOU ARE ASKING ME,
9 MR. LEVY.

10 Q WELL, I THINK YOU DO, MA'AM.

11 A I DO NOT. IF YOU WOULD --

12 Q LET ME ASK YOU ANOTHER ONE THAT YOU MIGHT
13 RECOLLECT. YOU REMEMBER WHEN YOU TOLD US -- YOU ARE A REAL
14 ESTATE LADY; IS THAT CORRECT?

15 A THAT'S CORRECT.

16 Q WERE YOU INVOLVED IN THE TRANSACTION THAT
17 ARRANGED FOR RANDALL KING AND ELIZABETH KING AT THAT TIME TO
18 ACQUIRE A LEASE ON A PROPERTY IN WESTLAKE VILLAGE?

19 A YES, I WAS.

20 Q CAN YOU TELL US THE REASON IT WAS NOT LEASED TO
21 THE CHURCH, BUT IT WAS LEASED TO A SUBSIDIARY OF THE CHURCH?

22 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
23 THE RELEVANCE AND ALSO 787 OF THE EVIDENCE CODE.

24 THE COURT: SUSTAINED.

25 Q BY MR. LEVY: MISS COURTRIGHT, ISN'T IT A FACT
26 THAT GREGORY MULL NEVER TOLD YOU ANYTHING BECAUSE THE
27 TEACHINGS OF THE CHURCH WERE EXTREMELY SPECIFIC ABOUT
28 DISCLOSING YOUR PAST OR TALKING ABOUT YOUR SEXUAL

1 PREFERENCES?

2 A THE ANSWER TO THE FIRST PART OF THE QUESTION IS
3 GREGORY MULL TOLD ME HE WAS A HOMOSEXUAL. I DIDN'T KNOW WHY
4 HE WANTED TO TELL ME THAT, BUT HE DID. OTHERWISE, I
5 WOULDN'T BE UP HERE TESTIFYING.

6 AND COULD YOU REPHRASE THE SECOND PART OF THE
7 QUESTION?

8 MR. LEVY: NO, I WON'T EVEN BOTHER, MISS COURTRIGHT.

9 NOTHING FURTHER, YOUR HONOR.

10 THE COURT: ANYTHING ELSE?

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

12

13 REDIRECT EXAMINATION +

14 BY MR. KLEIN:

15 Q IS THERE ANY TEACHING OF CHURCH UNIVERSAL AND
16 TRIUMPHANT THAT WOULD PREVENT YOU FROM TELLING THE TRUTH TO
17 THIS JURY WHEN YOU TESTIFIED?

18 A ABSOLUTELY NOT.

19 Q DID YOU TELL THE TRUTH TO THIS JURY?

20 A I VOLUNTARILY CAME FORWARD TO GIVE THIS TRUTH,
21 AND I SWORE TO GIVE THE TRUTH AND I HAVE GIVEN THE TRUTH.

22 MR. KLEIN: THANK YOU.

23 NO FURTHER QUESTIONS.

24 MR. LEVY: NOTHING FURTHER, YOUR HONOR.

25 THE COURT: YOU ARE EXCUSED.

26 ///

27 ///

28 ///

1 LOS ANGELES, CALIFORNIA; MONDAY, MARCH 10, 1986

2 9:57 A.M.

3 DEPARTMENT NO. 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS NOTED ON TITLE PAGE.)

5
6 MR. KLEIN: DR. SAUL LEVINE, YOUR HONOR.

7
8 SAUL LEVINE,

9 CALLED AS A WITNESS BY THE PLAINTIFF, WAS SWORN AND

10 TESTIFIED AS FOLLOWS:

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

14 THE WITNESS: SAUL LEVINE. S-A-U-L, L-E-V-I-N-E.

15 THE CLERK: THANK YOU.

16 THE COURT: PROCEED.

17 MR. KLEIN: THANK YOU, YOUR HONOR.

18
19 DIRECT EXAMINATION

20 BY MR. KLEIN:

21 Q ARE YOU A MEDICAL DOCTOR?

22 A YES, I AM.

23 Q ARE YOU LICENSED TO PRACTICE PSYCHIATRY AND
24 MEDICINE IN THE STATE OF CALIFORNIA?

25 A YES, I AM.

26 Q COULD YOU PLEASE GIVE US YOUR EDUCATIONAL
27 BACKGROUND?

28 A I RECEIVED MY BACHELOR OF SCIENCE AT MC GILL

1 UNIVERSITY AND I GRADUATED WITH WHAT IS CALLED THERE VERY
2 GREAT DISTINCTION COMPARABLE TO SUMMA CUM LAUDE HERE.

3 I WENT TO MEDICAL SCHOOL AT MC GILL, GRADUATED
4 THE TOP TEN PERCENT OF THE CLASS, INTERNEED AT MC GILL
5 UNIVERSITY AGAIN IN MONTREAL, CANADA AND DID MY PSYCHIATRY
6 TRAINING AT STANFORD UNIVERSITY IN PALO ALTO, CALIFORNIA.

7 I SPENT THE ENTIRE RESIDENCY TRAINING THERE. I
8 WAS CHIEF RESIDENT, PSYCHIATRY AT STANFORD AND WAS AN
9 INSTRUCTOR AT MY LAST YEAR THERE ON THE FACULTY OF MEDICINE
10 IN STANFORD UNIVERSITY MEDICAL SCHOOL.

11 Q COULD YOU GIVE US YOUR PROFESSIONAL BACKGROUND,
12 PLEASE?

13 A MY FIRST ACADEMIC JOB AND CLINICAL JOB WAS AS A
14 LECTURER ON THE FACULTY AT STANFORD. I THEN RETURNED TO MY
15 NATIVE CANADA AT THAT TIME WHERE MY ENTIRE FAMILY WAS AND
16 JOINED THE FACULTY OF MEDICINE, DEPARTMENT OF PSYCHIATRY AT
17 THE UNIVERSITY OF TORONTO.

18 WAS ON THE FACULTY THERE BUT WORKED AT THE
19 HOSPITAL FOR SICK CHILDREN WORKING MAINLY IN ADOLESCENT
20 SERVICES AS THE DIRECTOR OF THE DIVISION OVER THE YEARS.
21 AND WORKED IN THE CLARK INSTITUTE OF PSYCHIATRY, WHICH IS
22 AGAIN AT THE UNIVERSITY OF TORONTO.

23 IN 1981, I BECAME -- I WAS BY THEN A FULL
24 PROFESSOR IN THE DEPARTMENT OF PSYCHIATRY AND BECAME HEAD OF
25 THE DEPARTMENT OF PSYCHIATRY AT SUNNYBROOKE MEDICAL CENTER,
26 WHICH IS A THOUSAND BED TEACHING HOSPITAL AND GENERAL
27 HOSPITAL IN TORONTO.

28 THE INTERIM YEAR, I WAS LADY DAVIS VISITING

1 FELLOW AND VISITING PROFESSOR AT THE DEPARTMENT OF
2 PSYCHIATRY AT HADASSA HOSPITAL, HEBREW UNIVERSITY MEDICAL
3 SCHOOL, AND I SPENT THE ENTIRE YEAR THERE IN 1980.

4 Q HAVE YOU WON ANY HONORS OR AWARDS IN THE FIELD
5 OF PSYCHIATRY?

6 A I HAVE HAD NUMEROUS VISITING PROFESSORSHIPS
7 AROUND THE WORLD AND IN ADDITION, WHICH --

8 Q WHAT IS A VISITING PROFESSOR?

9 A I GUESS YOU ACHIEVE A CERTAIN STATURE IN YOUR
10 PROFESSION AND YOU ARE INVITED BY OTHER DEPARTMENTS, BY YOUR
11 PEERS AND COLLEAGUES TO SPEND TIME IN THE HOST DEPARTMENT
12 TEACHING RESIDENTS, COMMUNING WITH COLLEAGUES.

13 I DID MUCH MORE THAN THAT AS VISITING
14 LECTURESHIPS AND GUEST SPEAKERS AT NUMEROUS UNIVERSITIES
15 THROUGHOUT NORTH AMERICA AND WESTERN EUROPE AND ELSEWHERE.

16 I AM ON A NUMBER OF EDITORIAL BOARDS AND HAVE
17 BEEN, CONTINUE TO DO. I AM THE VICE-PRESIDENT OF THE
18 COMMITTEE FOR THE STUDY OF SECTS AND PARALLEL THERAPIES
19 BASED IN PARIS, FRANCE.

20 Q IS THAT SECTS, S-E-C-T-S?

21 A YES. AND I HAVE SOME OTHERS THAT MAYBE ARE NOT
22 RELATED TO WHAT WE ARE DOING HERE TODAY.

23 Q WHAT IS THAT COMMITTEE ON SECTS AND PARALLEL
24 THERAPIES? WHAT IS THE PURPOSE?

25 A THE PURPOSE IS TO GATHER INFORMATION OF
26 OBJECTIVE STUDIES IN THE FIELD OF INTENSE BELIEF SYSTEMS OF
27 VARIOUS KINDS, BE THEY RELIGIOUS OR OTHERWISE, RATHER THAN
28 RHETORIC TO LOOK AT VALID DATA.

1 Q WHAT IS AN INTENSE BELIEF SYSTEM?

2 A INTENSE BELIEF SYSTEM IS A SYSTEM OF VALUES,
3 ATTITUDES, PERCEPTIONS THAT SHAPE AN INDIVIDUAL'S ENTIRE WAY
4 OF PERCEIVING HIS OR HER WORLD TO SUCH AN EXTENT THAT IT
5 OVERRIDES AND SUPERSEDES ALMOST ANYTHING ELSE THAT THE
6 INDIVIDUAL MIGHT HAVE THOUGHT BEFORE AND MIGHT BE INVOLVED
7 WITH AT THAT TIME. IT IS ALL -- AN ALL ENCOMPASSING BELIEF.

8 Q HAVE YOU PUBLISHED ANY ARTICLES OR BOOKS
9 DEALING WITH PSYCHIATRY AND MOST PARTICULARLY WITH INTENSE
10 BELIEF SYSTEMS?

11 A YES, I HAVE.

12 Q AND COULD YOU TELL US WHAT ARTICLES AND BOOKS
13 YOU'VE PUBLISHED, AND PAY PARTICULAR ATTENTION TO THE ONES
14 THAT DEAL WITH THE ISSUES IN THIS CASE, DEALING WITH
15 RELIGIONS AND INTENSE BELIEF SYSTEMS?

16 A I HAVE OVER 50 PROFESSIONAL PUBLICATIONS, AND I
17 HAVE CONTRIBUTED NUMEROUS CHAPTERS TO NUMEROUS BOOKS IN THE
18 FIELD OF PSYCHIATRY, AND HAVE CO-EDITED TWO BOOKS, AND HAVE
19 AUTHORED ONE ON MY OWN THAT CAME OUT HERE IN CALIFORNIA --
20 HARCOURT, BRACE AND JOVANOVIH -- AND THERE IS ANOTHER BOOK
21 IN PRESS.

22 OF THE PUBLICATIONS THAT I HAVE PUBLISHED OVER
23 THE YEARS, ABOUT A DOZEN HAVE TO DO WITH THE ISSUE AT HAND
24 HERE. AND THEY RANGE FROM THE PUBLICATIONS THAT HAVE
25 CULMINATED FROM THREE STUDIES THAT I EMBARKED UPON DURING
26 THE SEVENTIES PUBLISHED IN DIFFERENT JOURNALS HERE AND IN
27 CANADA, PSYCHIATRIC JOURNALS.

28 I WAS LOOKING AT THE HEALTH, PHYSICAL AND

1 EMOTIONAL HEALTH ASPECTS OF CULTS AND MIND-BENDING GROUPS, I
2 BELIEVE IT WAS CALLED. IT WAS AN OFFICIAL TASK FORCE AND
3 COMMISSION APPOINTED BY THE GOVERNMENT OF ONTARIO AND THAT,
4 TOO, WAS PUBLISHED IN 1978.

5 AND I HAVE WRITTEN OTHER ARTICLES HAVING TO DO
6 WITH THIS AREA. I CAN GIVE YOU TITLES IF YOU WANT.

7 Q WHY DON'T YOU JUST GIVE US THE TITLES OF THE
8 ONES THAT SPECIFICALLY DEAL WITH CULTS, RELIGIONS, INTENSE
9 BELIEF SYSTEMS?

10 A ACTUALLY, IT IS A COMPLICATED QUESTION BECAUSE
11 THERE ARE SOME PAPERS AND ARTICLES THAT I WROTE THAT HAVE
12 NOT SPECIFICALLY DEALT WITH THE TITLE BUT EVOLVED INTO MY
13 THINKING.

14 THERE IS A STUDY DONE ON PEOPLE THAT LIVE IN
15 URBAN COMMUNES, AND SOME OF THOSE WERE IDEOLOGICALLY BASED,
16 WERE BROUGHT TOGETHER FOR RELIGIOUS OR OTHER KINDS OF
17 REASONS. AND IT WAS ONE OF THE REASONS THAT KINDLED MY
18 INTEREST IN THE AREA.

19 SPECIFICALLY ON CULTS, I HAVE PUBLISHED AN
20 ARTICLE ABOUT YOUTH IN CULTS BASED ON STUDY OF 109 YOUNG
21 PEOPLE IN EIGHT RELIGIOUS GROUPS. A SUBSEQUENT STUDY TWO
22 YEARS LATER PUBLISHED BY THE UNIVERSITY OF CHICAGO PRESS
23 LOOKING AT A SIMILAR NUMBER.

24 STUDY OF THE COMMISSION I MENTIONED EARLIER, AN
25 ARTICLE CALLED "CULTS AND MENTAL HEALTH," CLINICAL
26 CONCLUSIONS BRINGING TOGETHER THE LITERATURE, NOT ONLY MINE
27 BUT THAT I COULD GATHER AT THE TIME. THE ROLE OF PSYCHIATRY
28 AND OTHER PROFESSIONS IN THE PHENOMENON OF CULTS.

1 I DID A STUDY WHILE IN ISRAEL ON A HUNDRED
2 AND -- I FORGOT THE EXACT NUMBER -- YOUNG PEOPLE WHO BELONG
3 TO JEWISH ORTHODOX SEMINARIES CALLED YESHIVOT AND PUBLISHED
4 THAT HERE IN THE STATES.

5 I HAVE PUBLISHED AN ARTICLE LAST YEAR. THE
6 BOOK IS CALLED "RADICAL DEPARTURES." AND A SUBSEQUENT
7 ARTICLE TO THAT WAS CALLED "ADULT FADDISH BEHAVIOR AND
8 BELIEF SYSTEMS." AND THE POINT I MAKE IN THAT ARTICLE IS
9 THAT ALL AGES CAN BE SUSCEPTIBLE TO INTENSE BELIEF SYSTEMS
10 AND, SECONDLY, THAT ALL INTENSE BELIEF SYSTEMS NEED NOT BE
11 RELIGIOUS TO CAPTIVATE AN INDIVIDUAL ENTIRELY.

12 Q ARE YOU A MEMBER OF ANY ORGANIZATIONS INVOLVING
13 PRACTICE OF PSYCHIATRY?

14 A YES, I AM.

15 Q CAN YOU BRIEFLY LIST SOME OF THOSE FOR US?

16 A I AM A FELLOW OF THE AMERICAN PSYCHIATRIC
17 ASSOCIATION, THE AMERICAN ORTHO-PSYCHIATRIC ASSOCIATION. I
18 AM A COUNSELOR OF THE AMERICAN ASSOCIATION OF SOCIAL
19 PSYCHIATRY, THE INTERNATIONAL ASSOCIATION OF SOCIAL
20 PSYCHIATRY, THE AMERICAN SOCIETY FOR ADOLESCENT PSYCHIATRY,
21 CANADIAN PSYCHIATRIC ASSOCIATION AND A FEW OTHERS. AND
22 VARIOUS MEDICAL ASSOCIATIONS IN ADDITION.

23 Q ARE YOU CERTIFIED BY ANY BOARD THAT RECOGNIZES
24 PROFICIENCY IN YOUR FIELD?

25 A YES. I AM BOARD CERTIFIED IN CANADA. I AM A
26 FELLOW OF THE ROYAL COLLEGE OF PHYSICIANS AND SURGEONS,
27 WHICH MEANS I HAVE A SPECIALTY BOARD. I AM ACTUALLY AN
28 EXAMINER FOR THE BOARDS IN PSYCHIATRY IN CANADA.

1 Q HOW MANY YEARS HAVE YOU SPENT STUDYING CULTS,
2 NEW AGE RELIGIONS WITH REGARD TO INTENSE BELIEF SYSTEMS?

3 A I WOULD SAY ABOUT 13.

4 Q WHEN YOU FIRST EMBARKED ON THAT STUDY, WHAT, IF
5 ANY, ASSUMPTIONS WERE YOU OPERATING WITH WITH RESPECT TO NEW
6 AGE RELIGIONS? AND FOR THE SAKE OF NOT USING THE SAME
7 WORDS, I WILL USE THE NEW AGE RELIGION AND CULT AND
8 ALTERNATIVE RELIGION -- FOR ALL THESE, I WILL JUST USE THE
9 WORD NEW AGE RELIGION.

10 A OKAY.

11 Q WHAT ASSUMPTIONS WERE YOU OPERATING UNDER WHEN
12 YOU BEGAN YOUR STUDIES OF NEW AGE RELIGIONS.

13 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT
14 ASSUMES FACTS NOT IN EVIDENCE.

15 Q BY MR. KLEIN: WHAT, IF ANY, ASSUMPTIONS WERE
16 YOU OPERATING ON WHEN YOU BEGAN YOUR STUDIES OF NEW AGE
17 RELIGIONS?

18 MR. LEVY: SAME OBJECTION, YOUR HONOR.

19 THE COURT: HE CAN ANSWER.

20 THE WITNESS: CAN --

21 THE COURT: YOU CAN ANSWER, SIR.

22 THE WITNESS: OH. THANK YOU.

23 ACTUALLY, A RATHER NEGATIVE ONE, MR. KLEIN. I
24 CERTAINLY PAID ATTENTION TO THE MEDIA REPORTS. AND DURING
25 THE COURSE OF THE EARLY SEVENTIES ESPECIALLY, PARENTS,
26 FRIENDS, FAMILY MEMBERS WOULD COME TO ME AS A CLINICIAN VERY
27 CONCERNED ABOUT FAMILY MEMBERS WHO -- OR FRIENDS WHO HAD
28 JOINED SOME OF THESE GROUPS. SOMETIMES -- OFTEN RELIGIOUS,

1 BUT OTHER KINDS TOO.

2 AND ONE COULD NOT BUT FEEL ANTAGONISTIC BASED
3 ON THE REPORTS FROM A VERY ASKEWED SAMPLE LIKE THAT.

4 Q BY MR. KLEIN: YOU HAVE TOLD US ABOUT A NUMBER
5 OF ARTICLES AND BOOKS THAT YOU HAVE WRITTEN ABOUT NEW AGE
6 RELIGIONS. WHAT WAS THE BASIS OF YOUR KNOWLEDGE WHICH YOU
7 USED TO WRITE THOSE ARTICLES AND BOOKS?

8 A WELL, FIRST IS, I WOULD SAY FIRST IN IMPORTANCE
9 TOO, IS THE FIELD STUDIES I HAVE DONE, GOING INTO VARIOUS
10 RELIGIOUS GROUPS, MEETING WITH THE LEADERS, INTERVIEWING
11 MEMBERS DURING AND AFTER THEIR MEMBERSHIP. AND WE HAVE DONE
12 THAT NOW ON SEPARATE OCCASIONS NUMEROUS TIMES INVOLVING A
13 FEW HUNDRED PEOPLE, MEMBERS OF GROUPS. AND I STILL FOLLOW
14 OVER A HUNDRED PEOPLE WHO HAD BEEN -- HAD BEEN, NO LONGER
15 ARE -- IN RELIGIOUS GROUPS.

16 SECONDLY IS MY CLINICAL PRACTICE. WHICH I WAS
17 HAPPY WITH, BUT ONE GETS KNOWN IN CERTAIN AREAS THAT PEOPLE
18 CALL YOU FROM EVERYWHERE. AND I CERTAINLY HAD A LOT OF
19 ACCESS TO FAMILIES AND MEMBERS AND EX-MEMBERS.

20 THIRDLY WOULD BE I, BECAUSE OF VARIOUS TASK
21 FORCES, HAVE AN INTEREST, I HAVE READ THE WORLD'S
22 LITERATURE. THAT SOUNDS GRANDIOSE, BUT I HAVE COVERED A LOT
23 OF LITERATURE HAVING TO DO WITH THIS AREA. I AM INTERESTED
24 IN IT.

25 AND LASTLY IS THE COMMISSION THAT WAS AN
26 EXTENSIVE EIGHT MONTHS STUDY OF THIS AREA, RATHER
27 EXHAUSTIVE. AND WE -- AND DURING THAT COMMISSION, WE LOOKED
28 AT WHAT -- WE TRIED TO GET IN TOUCH WITH AS MANY EXPERTS AS

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1 POSSIBLE FROM EVERYWHERE, AND IN THE ENGLISH-SPEAKING WORLD,
2 AND THOSE WHO WERE AS MUCH ANTAGONISTIC AND THOSE WHO WERE
3 VERY PRAISING OF THESE GROUPS, INCLUDING MEMBERS AND
4 EX-MEMBERS WITH ANY KINDS OF COMPLAINTS, AND WE INTERVIEWED
5 THEM EXTENSIVELY.

6 Q WITH RESPECT TO THE FIELD STUDIES, CAN YOU GIVE
7 US AN IDEA OF HOW MANY PEOPLE YOU INTERVIEWED IN THOSE FIELD
8 STUDIES?

9 A I WOULD SAY APPROXIMATELY 400.

10 Q NOW, WOULD THOSE FOR THE MOST PART BE PEOPLE
11 WHO WERE ACTUALLY IN THESE RELIGIOUS GROUPS?

12 A WELL, ALL MY STUDIES HAD TO DO WITH INDIVIDUALS
13 WHO HAD BEEN IN FOR A MINIMUM OF SIX MONTHS. WE DIDN'T WANT
14 PEOPLE WHO WENT IN FOR OVERNIGHT OR COUPLE OF WEEKS AND
15 LEFT, WHICH IS NOT UNCOMMON AT ALL.

16 AND WHEN I SAY "WE," BECAUSE I OFTEN HAD
17 RESEARCH ASSISTANTS OR COLLEAGUES. WOULD INTERVIEW OVER A
18 PERIOD OF LONG MONTHS, SOMETIMES OVER A YEAR, SO THAT THE
19 MEMBERS SOMETIMES BECAME EX-MEMBERS DURING THE COURSE OF OUR
20 INTERVIEWS AND I WOULD SAY ABOUT HALF AND HALF. BUT OVER
21 THE COURSE OF YEARS, MOST OF THE MEMBERS BECAME EX-MEMBERS.

22 Q WITH RESPECT TO YOUR OFFICE COUNSELING, ABOUT
23 HOW MANY PEOPLE OVER THE YEARS HAVE YOU INTERVIEWED IN YOUR
24 OFFICE COUNSELING WHO WERE MEMBERS OR EX-MEMBERS OF THESE
25 RELIGIOUS -- NEW AGE RELIGIOUS GROUPS?

26 A INCLUDING THEIR FAMILIES, I WOULD ESTIMATE
27 ABOUT THE SAME NUMBER, ABOUT 400.

28 Q WOULD MOST OF THE PEOPLE THAT YOU WOULD SEE IN

1 YOUR COUNSELING SESSIONS, WOULD THEY BE MEMBERS, WOULD THEY
2 BE EX-MEMBERS? WHAT WAS THE PERCENTAGE THAT YOU WERE SEEING
3 IN COUNSELING?

4 A MAINLY EX-MEMBERS IN COUNSELING AND FAMILIES
5 DURING THE MEMBERSHIP. WHEN AN INDIVIDUAL IS VERY COMMITTED
6 TO THE GROUP AND THE PARENTS OR SONS OR DAUGHTERS ARE VERY
7 CONCERNED, AND INDIVIDUALS ARE COMMITTED TRUE BELIEVER,
8 THERE IS NO WAY THAT HE OR SHE PARTICULARLY WANT TO SEE ME
9 BECAUSE THEY FEEL VERY SATISFIED WITH THEIR LOT.

10 Q WHAT HAVE YOU READ, IF ANYTHING, IN PREPARATION
11 FOR TESTIFYING IN THIS CASE?

12 A I READ THE TRANSCRIPTS OF DEPOSITIONS BY MR.
13 GREGORY MULL, I READ COPIES OF HIS LETTERS OVER A PERIOD OF
14 A FEW YEARS THAT HE HAD WRITTEN TO ELIZABETH CLARE PROPHET,
15 TO MONROE SHEARER AND TO SOME NEWSPAPERS, I READ TRANSCRIPTS
16 OF TESTIMONY HERE BY DR. MARGARET SINGER, RABBI ROBBINS,
17 RANDALL KING, MR. MULL, MRS. LEVY AND MAYBE ONE OTHER. I
18 DON'T REMEMBER. AND I READ A TRANSCRIPT OF A MEETING THAT
19 HAD TAKEN PLACE BETWEEN MR. MULL AND ELIZABETH CLARE PROPHET
20 AND MONROE SHEARER AND EDWARD FRANCIS. AND I SPOKE WITH DR.
21 ROBERT MOORE.

22 Q NOW, IN YOUR STUDY OF NEW AGE RELIGIONS, YOU'VE
23 DONE COUNSELING AS WELL AS FIELD WORK. DO YOU HAVE AN
24 OPINION AS TO THE VALIDITY OF CONCLUSIONS ABOUT THE EFFECTS
25 THAT THESE GROUPS HAVE ON THEIR MEMBERS WHEN IT IS DERIVED
26 SOLELY FROM INFORMATION GAINED THROUGH COUNSELING SESSIONS.

27 MR. LEVY: I AM GOING TO OBJECT TO THE QUESTION, YOUR
28 HONOR. I THINK IT LACKS A FOUNDATION AND I THINK IT IS SUCH

1 A BROAD BASED QUESTION.

2 THE COURT: PLEASE REPHRASE IT.

3 Q BY MR. KLEIN: YOU'VE DONE HOW MANY YEARS OF
4 FIELD WORK INVOLVING NEW AGE RELIGIONS?

5 A THE RESEARCH ITSELF, PROBABLY ABOUT 15.

6 Q HOW MANY YEARS HAVE YOU BEEN COUNSELING THE
7 PARENTS OR --

8 A ABOUT THE SAME TIME.

9 Q NOW, AS A RESULT OF YOUR COUNSELING SESSIONS,
10 HAVE YOU REACHED CERTAIN CONCLUSIONS ABOUT THE EFFECTS OF
11 NEW AGE RELIGIONS ON THEIR MEMBERS?

12 A YES.

13 Q AS A RESULT OF YOUR FIELD WORK, HAVE YOU
14 REACHED CERTAIN CONCLUSIONS ABOUT THE EFFECTS OF NEW AGE
15 RELIGIONS ON THEIR MEMBERS?

16 A YES.

17 Q AND DURING THE COURSE OF DOING THIS WORK, HAVE
18 YOU REACHED ANY CONCLUSIONS AS TO THE VALIDITY OF OPINIONS
19 THAT WOULD BE REACHED ONLY FROM SAY COUNSELING AS OPPOSED TO
20 DOING COUNSELING AND FIELD WORK?

21 A YES.

22 MR. LEVY: AGAIN, YOUR HONOR -- I AM PREMATURE.
23 EXCUSE ME.

24 Q BY MR. KLEIN: WHAT OPINIONS HAVE YOU REACHED?

25 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR, BECAUSE
26 IT CALLS FOR SPECULATION AS TO WHO THE PEOPLE ARE WHO HAVE
27 FORMED OPINIONS, WHAT THEIR OPINIONS ARE, AND IT IS ON THAT
28 BASIS THAT THIS GENTLEMAN'S OPINION IS ASKED FOR.

1 THE COURT: SOUNDS TO ME AS IF YOU ARE QUESTIONING
2 THE FOUNDATION --

3 MR. LEVY: I THINK I AM QUESTIONING BOTH OF THEM.

4 THE COURT: -- FOR HIS OPINION.

5 MR. LEVY: I WOULD OBJECT BECAUSE IT DOES LACK
6 FOUNDATION AND WE HAVE HAD NO EVIDENCE WITH REGARD TO WHAT
7 THE NATURE OF OPINION --

8 THE COURT: LET ME ASK A QUESTION. WITHOUT TELLING
9 US WHAT THE SUBSTANCE OF YOUR OPINION IS, CAN YOU TELL US
10 HOW YOU WENT ABOUT REACHING A CONCLUSION --

11 THE WITNESS: YES.

12 THE COURT: -- IN ANSWER TO MR. KLEIN'S QUESTION?

13 THE WITNESS: YES. IT DEPENDS ON THE SPECIFIC STUDY
14 IN QUESTION. ALL THE STUDIES THAT I DID WITH INTENSE BELIEF
15 SYSTEMS OVER THE YEARS ALTHOUGH HAD ONE CENTRAL FOCUS, AND
16 THAT WAS TO, RATHER THAN LISTEN TO RHETORIC, TO GO INTO THE
17 GROUP AND MEET WITH MEMBERS, INDIVIDUAL MEMBERS, AND DO A --
18 BOTH A STRUCTURED AND UNSTRUCTURED INTERVIEW OVER A PERIOD
19 OF A FEW HOURS WITH THE MEMBERS.

20 WE WOULD SPEAK TO BOTH THE LEADERS TO GET THEIR
21 PERMISSION AND THE MEMBERSHIP. I DID THIS WITH THE
22 YESHIVOT, THE GROUPS COMMONLY DEPICTED AS CULTS AND OTHER
23 KIND OF GROUPS.

24 AS OFTEN AS POSSIBLE WE WOULD TRY TO GET
25 CORROBORATORY OR CONFLICTING EVIDENCE FROM PARENTS OR
26 FRIENDS OR OTHERS CONNECTED WITH THAT INDIVIDUAL. AND WE
27 CONTINUED TO DO FOLLOW-UP WITH THAT GROUP OVER THE COURSE OF
28 MONTHS AND YEARS DURING THE COURSE OF THEIR MEMBERSHIP IN

1 GROUPS.

2 HOWEVER, IN THE TASK FORCE IT IS -- WHEN I WAS
3 IN THAT COMMISSION, WE WENT OUT OF OUR WAY NOT ONLY TO
4 INTERVIEW MEMBERS BUT PEOPLE WHO WERE SPECIFICALLY
5 ANTAGONISTIC TO GROUPS AND HAD A LOT OF NEGATIVE THINGS TO
6 SAY.

7 I TRY TO BASE CONCLUSIONS NOT ONLY ON A GROUP
8 BUT SPECIFIC INDIVIDUAL IN A PARTICULAR SECT OF A PARTICULAR
9 GROUP ONLY AFTER MEETING THAT INDIVIDUAL AND KNOWING A LOT
10 ABOUT HIM OR HER BEFORE, DURING AND AFTER THAT MEMBERSHIP
11 BECAUSE IT IS VERY DIFFICULT TO MAKE ANY KIND OF GLOBAL
12 GENERALIZATION ON THE BASIS OF A SINGLE POINT IN TIME.

13 THE COURT: HE CAN ANSWER THE QUESTION.

14 MR. LEVY: EXCUSE ME, YOUR HONOR. I AM GOING TO --
15 THE QUESTION IS HIS OPINION AS TO COUNSELORS' OPINIONS.
16 NOW, I AM SURE SOME COUNSELORS HAVE SOME OPINIONS ONE WAY
17 AND SOME ANOTHER. HOW DO WE KNOW HOW HE FORMS HIS OPINION
18 ON HIS OPINIONS AND WHAT HIS OPINION IS BASED ON?

19 THE COURT: THAT ISN'T THE QUESTION.

20 MR. LEVY: THAT IS THE EXACT QUESTION.

21 THE COURT: WHY DON'T YOU REPHRASE THE QUESTION AND
22 HE CAN ANSWER IT.

23 MR. KLEIN: COULD WE READ BACK THE QUESTION? OR DO
24 YOU WANT ME TO REPHRASE IT AT THIS POINT? IF THE QUESTION
25 IS ACCEPTABLE AT THIS POINT, I WOULD JUST AS SOON READ IT
26 BACK RATHER THAN TAKE A CHANCE ON CHANGING IT AND GOING
27 THROUGH THIS AGAIN.

28 THE COURT: DO YOU HAVE AN OPINION AS TO THE VALIDITY

1 OF CONCLUSIONS REACHED THROUGH COUNSELING BUT ABSENT FIELD
2 CONTACT WITH THE PARTICULAR SECT?

3 IS THAT SUBSTANTIALLY --

4 MR. KLEIN: THAT IS EXACTLY IT, YES, YOUR HONOR.

5 THE WITNESS: YES, I HAVE ONE.

6 THE COURT: GO AHEAD.

7 Q BY MR. KLEIN: WHAT IS THAT?

8 A I THINK TO BASE GENERALIZATIONS MERELY ON ONE
9 TYPE OF INDIVIDUAL IS TO GET A VERY ONE-SIDED BIASED AND
10 SKEWED SAMPLE. I THINK JUST LIKE COMMITTED MEMBERS TO ANY
11 GROUP, TRUE BELIEVERS HAVE A VESTED INTEREST IN CONVINCING
12 PEOPLE ABOUT HOW WONDERFUL THEIR CAUSE IS. SO DO PEOPLE WHO
13 ARE ANGRY FOR ANY REASON AT A GROUP HAVE A VESTED INTEREST
14 IN CONVINCING AN INDIVIDUAL THAT THAT GROUP IS NEFARIOUS OR
15 EXPLOITATIVE OR DANGEROUS.

16 IF THAT IS ALL YOU ARE GOING TO SEE, THEN YOU
17 ARE GOING TO HAVE A VERY BIASED VIEW OF THAT RELIGIOUS GROUP
18 OR ANY OTHER KIND OF GROUP FOR THAT MATTER.

19 Q AND IN YOUR OPINION, BASED ON YOUR OWN
20 OBSERVATIONS AND EXPERIENCE, WHAT KIND OF PEOPLE COME TO
21 COUNSELING WITH PSYCHIATRISTS ABOUT THESE NEW AGE RELIGIOUS
22 GROUPS?

23 A WELL, AS I SAID, CERTAINLY NOT BEING AN
24 APOLOGIST FOR ANY KIND OF INTENSE BELIEF SYSTEM, A LOT OF
25 THE WORK THAT IS DONE BY COUNSELORS, THERAPISTS OF VARIOUS
26 KINDS, MENTAL HEALTH PROFESSIONALS IS WHILE AN INDIVIDUAL IS
27 IN A GROUP IS THE PEOPLE WHO ARE IN A SENSE LEFT BEHIND DO
28 NOT UNDERSTAND COULD BE PARENTS, COULD BE FRIENDS, COULD BE

1 OTHER FAMILY MEMBERS.

2 IF YOU ARE ASKING SPECIFICALLY ABOUT MEMBERS,
3 IT IS ONLY AFTER WHEN THEY BECOME -- FOR WHATEVER REASON
4 THEY LEAVE THE GROUP. IN THE FIRST FEW MONTHS AFTER THEY
5 LEAVE THE GROUP, IT IS ADMITTEDLY A ROUGH PERIOD FOR THEM,
6 JUST LIKE LEAVING ANY OTHER CLOSE SOCIAL SITUATION THAT ENDS
7 LIKE A MARRIAGE OR BUSINESS OR ANYTHING ELSE.

8 IT IS AT THAT POINT THAT INDIVIDUALS HAVE
9 CONTACTED ME AND GO THROUGH A PERIOD OF WEEKS OR MONTHS OF
10 SOME COUNSELING. AND I WOULD SAY THAT MOST PEOPLE WHEN THEY
11 LEAVE A GROUP HAVE SOME DEGREE OF CONCERNS ABOUT WHY THEY
12 JOINED IN THE FIRST PLACE AND WHY THEY LEFT AT THIS
13 PARTICULAR TIME. IT CAN BE UPSETTING TO THEM AND A SMALL
14 MINORITY DO SEEK COUNSELING AND THERAPY AS A RESULT.

15 I COULD ALSO ADD THAT THE PERIOD OF
16 INSTABILITY, IF YOU WANT TO CALL IT THAT, LASTS -- FROM OUR
17 STUDIES LAST ABOUT SIX MONTHS AT MOST. AND THEN THERE IS
18 WHAT WE CALL A REVERSION TO FORM WHEN THEY RESUME THEIR
19 LIVES WHERE THEY LEFT OFF.

20 THE COURT: CAN YOU GENERALIZE WITH FAIR RELIABILITY
21 WHAT DISTINGUISHES THOSE PEOPLE WHO LEAVE A SECT AND SEEK
22 COUNSELING FROM THOSE WHO LEAVE A SECT AND DO NOT SEEK
23 COUNSELING?

24 THE WITNESS: YES, I THINK SO.

25 THE COURT: WOULD YOU DO IT, PLEASE?

26 THE WITNESS: YES. I THINK THAT I'D SAY TWO KINDS OF
27 SITUATIONS PREDOMINATE. THERE ARE EXCEPTIONS AND I GUESS I
28 WILL GET TO THAT LAST. THERE ARE EXCEPTIONS TO ALMOST

1 ANYTHING IN HUMAN BEHAVIOR. ONE OF THE PROBLEMS WITH OUR
2 TRADE.

3 BUT ONE IS AN INDIVIDUAL WHO IN FACT HAD SOME
4 EMOTIONAL VULNERABILITIES OR PROBLEMS BEFORE THEY EVER WENT
5 INTO A GROUP. THIS IS A POPULATION AT RISK FOR ANY INTENSE
6 SITUATION, INCLUDING MEDICAL SCHOOLS.

7 THOSE INDIVIDUALS WHO DO POORLY EMOTIONALLY AS
8 A RESULT OF INTENSE PRESSURES ARE THOSE WHO HAVE SOMETHING
9 THEY HAVE SHOWN IN THE PAST. IF YOU TAKE A HISTORY, THEY
10 HAVE EITHER CONTACTED MENTAL HEALTH PROFESSIONALS OR WHO
11 HAVE DEMONSTRATED SOME MANIFESTATIONS OF EMOTIONAL DISORDER
12 BEFOREHAND. I DID SAY THAT THERE ARE INDIVIDUALS WHO --
13 THAT IS ONE.

14 I DID SAY THAT MANY INDIVIDUALS, WHEN THEY
15 LEAVE THE GROUP, HAVE A PERIOD OF INSTABILITY AND CONFUSION,
16 UNHAPPINESS FOR THAT PERIOD OF TIME. SOME OF THOSE WILL
17 SEEK COUNSELING BECAUSE IT IS COMMON IN THEIR MILIEU,
18 FAMILIES OR WHATEVER.

19 IF, HOWEVER, THE LEAVING OF A GROUP IS
20 PARTICULARLY DIFFICULT FOR AN INDIVIDUAL, THEN THAT
21 INDIVIDUAL IN A SENSE HAS THOSE EMOTIONAL TRAITS PERPETUATED
22 AND THOSE INDIVIDUALS I HAVE FOUND MOST DIFFICULT -- THAT
23 MOST PEOPLE LEAVE GROUPS -- MOST PEOPLE LEAVE GROUPS FAIRLY
24 SMOOTHLY ON THEIR OWN VOLITION NO MATTER WHAT IS DONE BY A
25 GROUP. BUT THOSE FOR WHOM IT IS DIFFICULT ARE PARTICULARLY
26 THE ONES WHO WILL SEEK COUNSELING.

27 THE COURT: THANK YOU.

28 Q BY MR. KLEIN: YOU HAVE READ THE TESTIMONY OF

1 DR. SINGER AT THIS TRIAL?

2 A YES, I HAVE.

3 Q NOW, SHE GAVE SIX CONDITIONS THAT NEED TO BE
4 PRESENT TO CARRY OUT A THOUGHT REFORM PROGRAM. DID YOU READ
5 THOSE SIX CONDITIONS?

6 A YES.

7 Q JUST BRIEFLY I WILL PARAPHRASE THEM.
8 NEED CONTROL OVER THE PERSON'S SOCIAL AND
9 PHYSICAL ENVIRONMENT; NEED TO CREATE A SENSE OF
10 POWERLESSNESS IN THE PERSON; YOU NEED TO MANIPULATE REWARDS,
11 PUNISHMENTS AND EXPERIENCES TO INFLUENCE THE PEOPLE TO
12 SUPPRESS THEIR OLD BEHAVIORS; YOU NEED TO MANIPULATE
13 REWARDS, AND EXPERIENCES AND PUNISHMENTS TO ELICIT NEW
14 BEHAVIOR; PERSON HAS TO BE UNAWARE THAT IT IS BEING DONE TO
15 THEM; AND THE SIXTH FEATURE IS IT HAS TO BE DONE WITHIN A
16 CLOSED SYSTEM OF LOGIC WHERE THERE IS NO COMPLAINT UPWARD TO
17 MANAGEMENT, MANAGEMENT IS ALWAYS RIGHT, THERE IS NO
18 CRITICISM.

19 DURING YOUR STUDIES OF INTENSE BELIEF SYSTEMS,
20 HAVE YOU FOUND THESE SIX CHARACTERISTICS TO EVER BE PRESENT
21 IN ANY OF THE ORGANIZATIONS OR GROUPS THAT YOU STUDIED?

22 A YES.

23 Q IS IT UNUSUAL TO STUDY A GROUP OR AN
24 ORGANIZATION WHERE THESE CHARACTERISTICS ARE PRESENT TO SOME
25 DEGREE?

26 A I WOULD UNDERLINE "TO SOME DEGREE." I THINK
27 THAT ANY INTENSE BELIEF SYSTEM THAT IS ASSOCIATED WITH A
28 GROUP, WE ARE -- THERE HAS TO BE A GROUP INVOLVED, NOT JUST

1 A PARTICULAR. A GROUP INVOLVED HAS THESE FACETS GREATER OR
2 TO SOME DEGREE. SOME MINIMAL, SOME MARKED.

3 Q ARE THERE ONLY RELIGIOUS ORGANIZATIONS THAT
4 HAVE THESE SIX CHARACTERISTICS PRESENT TO SOME DEGREE IN
5 YOUR STUDIES?

6 A ABSOLUTELY NOT. I HAVE SEEN POLITICAL,
7 MILITARY, THERAPEUTIC, INTENSE MOVEMENTS THAT ARE OFTEN
8 PERCEIVED BY THE OUTSIDE AS THE SAME WAY THIS PARTICULAR
9 GROUP IS PERCEIVED, AS DANGEROUS OR EXPLOITATIVE. BUT IT
10 NEED NOT BE RELIGIOUS. THERE HAS TO BE AN OVERRIDING
11 IDEOLOGY AND TREMENDOUS GROUP INVOLVEMENT, COMMITMENT.

12 Q WHEN THESE SIX CHARACTERISTICS ARE PRESENT,
13 WHAT, IF ANY, EFFECT HAVE YOU FOUND THAT THEY HAVE ON
14 INDIVIDUALS WHO ARE MEMBERS OF THE GROUPS?

15 A IT VARIES, MR. KLEIN, FROM A MINIMAL EFFECT TO
16 A GREAT DEAL OF INFLUENCE.

17 Q COULD YOU EXPLAIN?

18 A WELL, YEAH. THE PROBLEM WITH THESE SIX
19 CHARACTERISTICS, IF THAT IS ALL THAT DEFINES A GROUP AND
20 NOTHING ELSE -- AND I HAVEN'T SEEN ANY GROUP WHERE THIS IS
21 ALL THAT DEFINES A GROUP -- THEN WE ARE NOT PAYING ATTENTION
22 TO MANY OTHER CHARACTERISTICS THAT MIGHT BE SUPPORTIVE,
23 ENHANCING, ENABLING TO THAT INDIVIDUAL. THAT IS NUMBER ONE.

24 SECONDLY, AND PROBABLY WHAT I FEEL MOST
25 STRONGLY ABOUT, IS IT DOES TAKE INTO NO ACCOUNT THE
26 INDIVIDUAL PERSONALITY, NEEDS, PROBLEMS, CONFLICTS,
27 WHATSOEVER OF THE INDIVIDUAL, THE PERSONALITY
28 CHARACTERISTICS AND TYPE OF THE MEMBER.

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1 BECAUSE YOU CAN HAVE A MEMBER WHO CAN BECOME AN
2 INTENSE TRUE BELIEVER OVER THE MOST INNOCUOUS GROUP AND YOU
3 CAN GET SOMEBODY TO WITHSTAND THE MOST OPPRESSIVE
4 INFLUENTIAL GROUP. IT PARTLY IS A MARRIAGE BETWEEN THE
5 NEEDS OF THE INDIVIDUAL AND WHAT IS OFFERED BY THE
6 PARTICULAR GROUP.

7 BUT TO FORGET ABOUT THE PARTICULAR
8 INDIVIDUAL -- AND I THINK POINT FIVE OF DR. SINGER'S SIX
9 CHARACTERISTICS ARE THIS IS DONE WITHOUT THE KNOWLEDGE OF
10 THE MEMBERS -- IT IS NOT DONE WITHOUT THE KNOWLEDGE OF
11 MEMBERS. THE MEMBERS HAVE THEIR EYES OPEN. THE MEMBERS
12 KNOW EXACTLY WHAT IS HAPPENING, THE MEMBERS ARE SHOPPING AND
13 THEY ARE BUYING WHAT IS IN THE MARKETPLACE.

14 Q WHAT DO YOU MEAN BY TRUE BELIEVER?

15 A WELL, A TRUE BELIEVER IS -- I DEFINED EARLIER
16 WHAT AN INTENSE BELIEF SYSTEM IS. A TRUE BELIEVER IS A TERM
17 COINED BY ERIC HOFFER BACK IN THE SIXTIES. IT REFERS TO AN
18 INDIVIDUAL WHO -- THE INDIVIDUAL WHO FOLLOWS THE BELIEF
19 SYSTEM WITH SUCH A PASSION THAT ALL ELSE GETS SUPERSEDED AND
20 SUBJUGATED TO THAT PASSION.

21 THE TRUE BELIEVER HAS A KIND OF CLOSED
22 MINDEDNESS TO OTHER CONFLICTING POINTS OF VIEW. THE TRUE
23 BELIEVER LEAVES OTHER VALUES, OLD RELATIONSHIPS, OTHER WAYS
24 OF LIFE, SOMETIMES TO THE CONSTERNATION OF OTHER PEOPLE WHO
25 WERE CLOSE TO HIM OR HER IN THE PURSUIT OF THAT BELIEF
26 SYSTEM.

27 THE TRUE BELIEVER IS OFTEN, WITH ALL DUE
28 RESPECT, OFFENSIVE TO THOSE AROUND THEM BECAUSE THEY HAVE

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1 THIS CAUSE CELEBRE THAT, IF YOU DON'T BELIEVE, CAN BE VERY,
2 AT BEST, BORING WHEN THEY PROSELYTIZE AND, AT WORST, JUST
3 OFFENSIVE AND ABRASIVE.

4 AND THEN THAT TOO DEPENDS ON THE INDIVIDUAL WHO
5 CARRIES IT FORTH AS A FLAG THAT HAS TO BE CARRIED AT ALL
6 OCCASIONS FROM ANY COCKTAIL PARTY TO ANY INFORMAL SETTING
7 ALL THE WAY TO NOT MENTIONING IT AT ALL BECAUSE THIS HAPPENS
8 TO BE A VERY IMPORTANT BELIEF FOR THEM.

9 Q IN YOUR EXPERIENCE, DO TRUE BELIEVERS REMAIN IN
10 THESE GROUPS INDEFINITELY?

11 A NO.

12 Q WHAT HAPPENS TO THEM?

13 A WELL, I MUST SAY THAT WITH VERY FEW EXCEPTIONS,
14 THE VAST MAJORITY OF PEOPLE OF ANY INTENSE BELIEF SYSTEM
15 LEAVE. THEY LEAVE -- ALL GROUPS, ALL INTENSE SYSTEMS. THAT
16 IS ONE OF THE REASONS WE SEE CHANGES IN PEOPLE'S LIVES, ONE
17 OF THE REASONS WE SEE THESE GROUPS MAKING THEIR APPEARANCE,
18 REACHING A CRESCENDO AND THEN DISAPPEARING. I AM NOT SAYING
19 IT WILL HAPPEN TO THIS GROUP, BUT WE SEE THIS COMMON IN
20 SOCIETY.

21 THE INDIVIDUAL IS IMBUED WITH A -- THE MEMBER
22 HAS THIS TRUE BELIEF. AND THE LEADER AT THE TOP AND THE
23 BELIEF SYSTEM IS IDEALIZED TO A CONSIDERABLE EXTENT.

24 THERE OCCURS AT A POINT OF DISILLUSIONMENT WHEN
25 THERE IS A REALIZATION THAT THESE PEOPLE ARE JUST THAT,
26 PEOPLE WITH FOIBLES AND DEFICIENCIES, AND THEY ARE
27 DISILLUSIONED. THEY SEE INCONSISTENCIES AND HYPOCRISIES AND
28 THEY SAY, "WAIT A SECOND. I BELIEVED IN ALL MY HEART." AND

1 IT IS LIKE A CHILD THAT IDEALIZES THEIR PARENTS AND THEN
2 SEES THEM FOR WHAT THEY ARE WORTH, WHICH IS LIKE ALL OF US.

3 ANOTHER THING THAT HAPPENS AT SOME POINT -- I
4 JUST HAVE NEVER SEEN OR HAVE SELDOM SEEN EXCEPTIONS -- IS
5 THAT THEY START MISSING THE VERY THINGS THAT THEY CAST OFF
6 WITH ABANDON. IT COULD BE THEIR HOMES, IT COULD BE THEIR
7 FAMILIES, IT COULD BE THEIR WAYS OF LIFE, JOB, SCHOOL,
8 WHATEVER. BUT THERE IS AN INVARIABLE INEXORABLE MOVE OUT AT
9 THAT POINT.

10 I HAVE STAGES OF BELIEF IN VARIOUS MOVEMENTS
11 AND I CALL THIS SEEDS OF DOUBT. AND THERE IS NO STOPPING
12 THEM. IT DOESN'T PAY THE GROUP TO SAY, "THOU SHALT NOT,"
13 OR, "YOU CAN'T GET OUT," BECAUSE THEY ARE GOING TO GET OUT
14 NO MATTER WHAT. THEY ARE GOING TO LEAVE ON THEIR OWN.

15 Q WHAT CAUSES PEOPLE TO BE TRUE BELIEVERS?

16 A WELL, I -- HAVING LOOKED AT THIS FOR YEARS, I
17 REALLY THINK THAT IT HAS TO DO WITH THE NEEDS OF THE
18 INDIVIDUAL. I SEE PEOPLE -- WE ALL GO THROUGH TOUGH TIMES
19 IN OUR LIVES FROM TIME TO TIME, PEOPLE GOING THROUGH A
20 CRITICAL PERIOD WHEN THEY FEEL KIND OF ALIENATED.

21 THEY MIGHT GO -- SOMEONE MARGINAL, THEY MIGHT
22 NOT BE MAKING IT IN A BIG WAY, HOWEVER. THEY ARE NOT
23 SATISFIED WITH THEMSELVES. THERE IS NO OVERRIDING
24 ENTHUSIASM OR DIRECTION IN THEIR LIVES. AND THIS IS THE
25 CRITICAL PERIOD. I CALL IT ALIENATION, DEMORALIZATION AND
26 LOW SELF-ESTEEM.

27 IF AT THAT CRITICAL PERIOD A GROUP PRESENTS
28 ITSELF THAT IS NON-THREATENING, THAT IS SEDUCTIVE -- I DON'T

1 MEAN THIS IN A MANIPULATIVE WAY. I MEAN THEY ARE OFFERING
2 SOMETHING TO ANSWER THOSE PARTICULAR VOIDS, ONE OF THESE
3 THINGS ALL THESE GROUPS GIVE.

4 WE LIVE IN AN AMBIGUOUS WORLD. THESE GROUPS
5 SAY, "THIS IS THE WAY IT IS, RIGHT, WRONG, YES, NO, UP,
6 DOWN." AND IT MAKES IT VERY -- FOR SOMEBODY WHO IS IN SOME
7 STATE OF DYSEQUILIBRIUM, THIS IS VERY COMFORTING. IT IS A
8 SENSE OF SECURITY. ALL THOSE VOIDS ARE IN FACT ENHANCED.

9 THEY GET A TREMENDOUS FEELING OF INNER
10 IMPORTANCE, NOT SELF-INFLATED. THEY FEEL THEY ARE PART OF
11 SOMETHING BIGGER THAN THEMSELVES, MORE IMPORTANT THAN
12 THEMSELVES. IT IS AN OUTER DIRECTED IDEOLOGY. THEY FEEL
13 THEY ARE A PART OF AN IMPORTANT GROUP OF PEOPLE THAT ACCEPTS
14 THEM UNEQUIVOCALLY, AND THEY ARE AN IMPORTANT PART OF THAT
15 GROUP OF PEOPLE AND THEY FEEL GOOD ABOUT THEMSELVES MAYBE
16 FOR THE FIRST TIME IN THEIR LIVES.

17 THE COMMITMENT TO THAT GROUP IS A HIGH FOR
18 THOSE INDIVIDUALS. THEY FEEL TERRIFIC ABOUT THEMSELVES.

19 Q WITH RESPECT TO INDIVIDUALS WHO ARE IN THE
20 SITUATION YOU HAVE JUST DESCRIBED, DOES IT MATTER IF THE
21 GROUP IS A NEW AGE RELIGION, A CULT OR AN ESTABLISHED
22 RELIGION?

23 A YOU CAN SEE THIS KIND OF INDIVIDUAL IN ALMOST
24 ANY KIND OF BELIEF SYSTEM. I AM ABSOLUTELY CONVINCED OF
25 THAT. I HAVE SEEN THEM. AND THE LIST OF GROUPS THAT ARE
26 CONSIDERED TO BE DANGEROUS OR NEFARIOUS AND WITH THE FOUR
27 LETTER WORD "CULT" IS PARTLY IN THE EYE OF THE BEHOLDER.

28 THAT IS, I HAVE HAD PEOPLE TELL ME, "THIS IS A

1 CULT." AND I SAY, "OH, YEAH. THAT PARTICULAR GROUP
2 EVERYBODY KNOWS." BUT THEY WOULD NAME THINGS THAT COULD BE
3 COMMERCIAL ENTERPRISES, IT COULD BE SOCIAL GROUPS, IT COULD
4 BE ESTABLISHED RELIGIOUS GROUPS, IT COULD BE POLITICAL
5 AFFILIATIONS.

6 AND BECAUSE THE INDIVIDUAL DEVELOPS SUCH A
7 COMMITMENT TO THAT GROUP TO THE EXCLUSION OF EVERYTHING ELSE
8 AND MAYBE TURNS OVER MONEY, MAYBE TURNS OVER ENERGY,
9 EVERYTHING TO THAT GROUP, IT IS SEEN BY OTHERS AS THE
10 GROUP'S FAULT WHEN IN FACT IT IS THE INDIVIDUAL WHO IS ON
11 THIS QUEST AND IS LOOKING FOR SOMETHING AND FINDS IT THERE
12 FOR A TEMPORARY PERIOD.

13 Q WHAT DO TRUE BELIEVERS GET OUT OF THESE GROUPS?

14 A I MENTIONED THAT --

15 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT
16 CALLS FOR A CONCLUSION. UNLESS THIS WITNESS HAS TALKED TO
17 ALL THE TRUE BELIEVERS AND HE WANTS TO LIST WHAT EACH OF
18 THEM GETS.

19 THE COURT: HE CAN ANSWER.

20 THE WITNESS: I HAVE A VERY STRONG OPINION ABOUT WHAT
21 THEY GET OUT OF THE GROUP. I HAVE NOT INTERVIEWED ALL TRUE
22 BELIEVERS IN THE WORLD. I HAVE INTERVIEWED MANY. A FEW
23 HUNDRED. AND THEY ALL -- TO ME, THEY ALL GET THE SAME
24 THING.

25 THEY GET BELIEF AND BELONGING. THEY GET THIS
26 ENORMOUS SENSE OF COMMITMENT, BELIEF IN WHAT THEY ARE DOING,
27 THAT IT IS RIGHT, AND IT IS LOFTY, AND SACROSANCT, AND IT IS
28 IMPORTANT, AND THEY GET THIS TERRIFIC FEELING OF BELONGING

1 TO A GROUP THAT IS ACCEPTING THEM AND THEY FEEL COMFORTED BY
2 THAT GROUP.

3 THEY DON'T GO THERE -- THAT IS WHY I STRESSED
4 THE NEED FOR A GROUP. THEY GO HAND IN HAND. YOU CAN'T
5 HAVE -- FOR THE TRUE BELIEVER TO BE DESCRIBED THIS WAY, YOU
6 CAN'T HAVE IT WITHOUT A GROUP AND YOU CAN'T HAVE A GROUP
7 WITHOUT AN IDEOLOGY TO BE DESCRIBED IN THIS WAY WHEN THEY GO
8 HAND IN HAND.

9 THE THIRD THING THEY GET IS THEY FEEL TERRIFIC
10 ABOUT THEMSELVES. SO WHEN YOU ASK THEM -- IT MAKES IT VERY
11 DIFFICULT FOR THOSE TO GET SOMEBODY OUT OF THE GROUP. THEY
12 ASK THEM TO LEAVE. THEY SAY, "WHY SHOULD I LEAVE? I HAVE
13 NEVER FELT BETTER ABOUT MYSELF OR ABOUT ME IN MY LIFE. WHY
14 SHOULD I LEAVE NOW?" THAT IS A VERY COMMON QUESTION THAT WE
15 GET.

16 Q BY MR. KLEIN: ARE YOU FAMILIAR WITH THE TERM
17 COERCIVE PERSUASION?

18 A YES.

19 Q WHAT DOES IT MEAN?

20 A FROM MY PERSPECTIVE, COERCIVE PERSUASION IS
21 RELATED TO THE COLLOQUIAL TERM BRAINWASHING AND MIND BENDING
22 WAS USED IN OUR PARTICULAR COMMISSION, AND MIND CONTROL, ALL
23 THESE ARE RELATIVE SYNONYMS.

24 ONE WAY OF DEFINING IT IS A PLANNED STRATEGIC
25 SERIES OF SEDUCTIVE AND PRESSURE TACTICS TO CONVINCING AN
26 INDIVIDUAL THAT HIS OR HER BELIEF SYSTEM IS -- OR THE
27 ABSENCE OF ONE -- IS WRONG AND THAT THIS NEW ONE HAS TO BE
28 ADOPTED WITH A GREAT DEAL OF FERVOR. AND THERE IS A PROMISE

1 OF SOME KIND OF PAYOFF AT THE END IF THEY GET IT.

2 BUT MORE IMPORTANTLY FOR THE REAL COERCIVE
3 PERSUASION, GOING ALONG WITH LIFTON DESCRIBED IN CIRCUIT
4 KOREA, WAS THE IMPLICIT OR EXPLICIT THREAT OF VIOLENCE OR
5 DEATH. THAT IS COERCIVE PERSUASION.

6 Q IN YOUR EXPERIENCE, ARE TRUE BELIEVERS VICTIMS
7 OF COERCIVE PERSUASION?

8 A NO.

9 Q COULD YOU EXPLAIN?

10 A WELL, I DON'T THINK THAT -- I NOT ONLY NOT
11 THINK, I HAVE NOT SEEN IN ANY OF THE STUDIES I HAVE DONE AND
12 ANY OF THE PEOPLE I HAVE WORKED WITH ANY INDICATION THAT
13 THESE PEOPLE ARE UNDER THAT KIND OF STRATEGICALLY MANAGED
14 PSYCHOTECHNOLOGY IN ORDER TO BREAK THEIR SPIRIT AND ENSLAVE
15 THEM UNDER THE THREAT OF SOME KIND OF SEVERE PUNISHMENT. I
16 JUST HAVE NOT SEEN THAT.

17 Q IN YOUR EXPERIENCE, WHAT HAPPENS -- AND YOU
18 HAVE SPOKEN ABOUT THIS TO SOME EXTENT ALREADY -- BUT WHAT
19 HAPPENS WHEN A TRUE BELIEVER BECOMES DISILLUSIONED WITH THE
20 GROUP?

21 A TRUE BELIEVER WHO BECOMES DISILLUSIONED LEAVES
22 INVARIABLY. CERTAINLY IN THE YOUNG PEOPLE THAT I HAVE
23 LOOKED AT, 90 PERCENT PLUS LEAVE IN UNDER TWO YEARS. IN
24 OLDER PEOPLE, IT IS SOMEWHAT LONGER AND AGAIN DEPENDING ON
25 THE NEEDS BEING FULFILLED BY THE GROUP AND WHATEVER
26 ADMINISTRATIONS ARE BEING OFFERED BY THAT PARTICULAR GROUP
27 AND THE PERSONALITY OF THE INDIVIDUAL MEMBER.

28 BUT ONCE DISILLUSIONED, THEY ARE GOING TO

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1 LEAVE, AND THEY ARE GOING TO LEAVE NO MATTER WHAT IS DONE BY
2 THE GROUP. I THINK THE GROUPS HAVE LEARNED OVER THE LAST
3 COUPLE OF DECADES THAT STOPPING THEM DOES NOT DO THEM ANY
4 GOOD. THEY NOT ONLY GET INTO TROUBLE, BUT THEY DON'T
5 PREVENT ANYBODY FROM LEAVING.

6 SO THE DISILLUSIONMENT -- IT FORCES THEM TO
7 LEAVE AND AGAIN THEY LEAVE WITH A GREAT DEAL OF
8 SELF-QUESTIONING AND SOME PROBLEMS THEREAFTER.

9 Q YOU HAVE READ MULL'S TRIAL -- MR. MULL'S TRIAL
10 TESTIMONY HERE, YOU HAVE READ HIS SIX-VOLUME DEPOSITION, YOU
11 HAVE READ LETTERS THAT HE WROTE TO ELIZABETH CLARE PROPHET
12 AND OTHER CHURCH OFFICIALS. BASED ON THE INFORMATION YOU'VE
13 READ, BASED ON THE KNOWLEDGE AND EXPERIENCE, DO YOU HAVE AN
14 OPINION AS TO WHETHER THE BEHAVIOR OF MR. MULL IS CONSISTENT
15 WITH THAT OF A TRUE BELIEVER?

16 A WELL, ON THE BASIS OF WHAT I READ, YES.

17 Q WHAT IS YOUR OPINION?

18 A ON THE BASIS OF WHAT I READ, AND I GIVE MYSELF
19 THE SAME CAVEAT I GAVE TO OTHERS NOT HAVING MET MR. MULL,
20 THOSE -- THAT TESTIMONY AND THOSE DEPOSITIONS AND THOSE
21 LETTERS CERTAINLY ARE VERY STRONG INDICATIONS THAT HE WAS,
22 AS I DEFINED, A TRUE BELIEVER.

23 Q CAN YOU EXPLAIN JUST WHAT IT IS YOU ARE
24 REFERRING TO?

25 A WELL, THE -- CERTAINLY DURING THE COURSE OF
26 BEFORE MR. MULL BECAME DISILLUSIONED, THERE WAS A TOTAL
27 ADULATION OF ELIZABETH CLARE PROPHET. THERE WAS A TOTAL
28 COMMITMENT TO THE IDEOLGY. EVEN WHEN THERE WERE CONCERNS

1 ABOUT OTHER PEOPLE IN THE RELIGIOUS GROUP, THE IDEOLOGY
2 ALWAYS MAINTAINED FOR MR. MULL A LOFTY POSITION IN HIS
3 THINKING.

4 AND AGAIN THE LETTERS ARE WRITTEN IN SUCH A WAY
5 TO ELIZABETH CLARE PROPHET THAT THEY IMBUE HER WITH CERTAIN
6 CHARACTERISTICS, WHICH I SEE ALL THE TIME FOR SOMEBODY WHO
7 IS A TRUE BELIEVER THAT THE LEADER IS GIVEN ALMOST MAGICAL
8 CHARACTERISTICS, BEYOND HUMANITY BECAUSE OF THE NEEDS BEING
9 FULFILLED BY THAT PARTICULAR -- TO THAT PARTICULAR MEMBER.

10 Q IN YOUR EXPERIENCE, WHEN TRUE BELIEVERS LEAVE
11 THE GROUP OR ORGANIZATION, DO THEY SUFFER PERMANENT
12 EMOTIONAL PSYCHOLOGICAL DAMAGE?

13 MR. LEVY: I AM GOING TO HAVE TO OBJECT, YOUR HONOR.
14 CALLS FOR A CONCLUSION. IT ALSO CALLS FOR SPECULATION.
15 CERTAINLY THIS WITNESS HAS NOT EXAMINED ALL PEOPLE WHO HAVE
16 LEFT CULTS.

17 THE COURT: ARE YOU ABLE TO GENERALIZE WITH STRONG
18 RELIABILITY?

19 THE WITNESS: WELL, ONE OF THE THINGS WE DO WHEN WE
20 ARE DEALING WITH --

21 MR. LEVY: EXCUSE ME, YOUR HONOR. RATHER THAN
22 ANSWERING YOUR QUESTION, I THINK THE WITNESS MISTAKENLY
23 STARTED TO ANSWER MR. KLEIN'S QUESTION.

24 THE COURT: I THINK HE IS ABOUT TO ANSWER MY
25 QUESTION.

26 THE WITNESS: I AM. I AM. I WAS GOING TO TALK ABOUT
27 THE RELIABILITY.

28 MR. LEVY: HE TOLD US HE WORKED WITH 400 PEOPLE.

1 THERE ARE THOUSANDS WHO HAVE LEFT.

2 THE COURT: IT IS NOT NECESSARY THAT HE HAVE EXAMINED
3 OR INTERVIEWED ALL.

4 THE WITNESS: I WOULD LIKE TO SAY THAT IT IS A
5 PROBLEM IN SCIENTIFIC RESEARCH OF ALL KIND THAT IS AN ISSUE
6 OF RELIABILITY AND VALIDITY. AND WE ONLY GO ON WHAT IS
7 CALLED LEVELS OF STATISTICAL SIGNIFICANCE. AND IT IS ONE OF
8 THE REASONS WE DO RESEARCH IS TO BE REVIEWED BY OUR PEERS,
9 TO SAY, "THIS GUY IS SHOOTING OFF HIS MOUTH ON THE BASIS OF
10 WHAT HE THINKS," OR, "IS THERE ANY RESEARCH TO BACK IT UP,
11 ANY DATA, WHAT ARE THE LEVELS OF SIGNIFICANCE?"

12 SO I WILL -- I CAN SAY THAT THEY ARE RELIABLE
13 FROM MY PERSPECTIVE, BUT I AM SURE THERE ARE OTHERS WHO
14 MIGHT SAY THEY ARE NOT.

15 THE COURT: CAN YOU QUANTIFY THE RELIABILITY?

16 THE WITNESS: I FEEL VERY CONFIDENT IN MY CONCLUSIONS
17 AND I HAVE NOT READ ANY STUDIES THAT DO NOT CORROBORATE WHAT
18 I HAVE SAID. THERE ARE A LOT OF STUDIES THAT I CAN GIVE YOU
19 THAT HAVE CORROBORATED MY FINDINGS.

20 THE COURT: WOULD YOU EXPECT NINE OUT OF TEN PEOPLE
21 WHO LEAVE A CULT OR SECT WILL BEHAVE AS YOU HAVE -- AS YOU
22 WOULD TELL US?

23 THE WITNESS: YES. I WOULD SAY THAT MUCH MORE THAN
24 NINE OUT OF TEN. I WOULD SAY IN TERMS OF PERMANENT
25 EMOTIONAL DAMAGE, IF THAT IS THE QUESTION, AM I ANSWERING
26 THAT QUESTION?

27 THE COURT: WELL, THAT IS THE QUESTION WE ARE GOING
28 TO GET TO IN A FEW MINUTES.

1 THE WITNESS: OKAY. I WOULD SAY MUCH MORE THAN NINE
2 OUT OF TEN.

3 THE COURT: OKAY. YOU CAN ANSWER. GO AHEAD.

4 THE WITNESS: I HAVE FORGOTTEN THE EXACT QUESTION.

5 I WOULD SAY THAT ON THE BASIS OF OUR COMMISSION
6 AND THE FOLLOW-UP STUDIES WE HAVE DONE AND THE PATIENTS THAT
7 I HAVE SEEN, ALMOST INVARIABLY THERE IS NO PERMANENT
8 EMOTIONAL SCARRING.

9 Q BY MR. KLEIN: DURING THE COURSE OF YOUR
10 STUDIES OF INDIVIDUALS, DID YOU EVER DO FOLLOW-UPS TO
11 DETERMINE IF THERE WAS SOME KIND OF PERMANENT, SOCIOLOGICAL
12 OR EMOTIONAL SCARRING OR DAMAGE?

13 A YES.

14 Q COULD YOU TELL US ABOUT THAT?

15 A I STILL DO THAT.

16 I STARTED TO SAY THAT IN THE COURSE OF THESE
17 STUDIES, WHEN YOU -- THEY ARE DONE OVER A PERIOD OF YEARS,
18 REALLY. YOU IMMEDIATELY SEE PEOPLE AFTER BECAUSE IF THEY
19 LEAVE SHORTLY AFTER YOUR INTERVIEW, AND I HAVE SEEN THAT IN
20 ALMOST EVERY STUDY, THEY ARE NOT A CAPTIVE POPULATION.

21 THERE IS A TURNOVER IN ALL THESE GROUPS THAT IS
22 DRAMATIC, AS A MATTER OF FACT, THE GROUPS THAT I HAVE LOOKED
23 AT. YOU ARE, BY VIRTUE OF CONTINUING TO SEE THOSE PEOPLE,
24 TO DO FOLLOW-UPS. BUT WE HAVE GONE BEYOND THAT.

25 I AM STILL FOLLOWING PEOPLE THAT I INTERVIEWED
26 IN THE MID-SEVENTIES WHO WERE IN VARIOUS KIND OF GROUPS,
27 JUST TELEPHONE FOLLOW-UPS. AND ALSO WITH THE COMMISSION, WE
28 LOOKED AT PEOPLE WHO HAD LEFT THE GROUPS AND WE SOUGHT OUT

1 THEIR OPINION, BOTH PRO AND CON.

2 Q IN YOUR EXPERIENCE, HAVE YOU EVER FOUND A
3 SINGLE INDIVIDUAL WHO SUFFERED PERMANENT EMOTIONAL,
4 PSYCHOLOGICAL DAMAGE AS A RESULT OF MEMBERSHIP IN ANY
5 RELIGIOUS GROUP OR CULT?

6 A NO, I HAVE NOT.

7 Q DO YOU HAVE AN OPINION AS TO WHETHER A
8 PSYCHOLOGIST CAN CONCLUDE THAT AN INDIVIDUAL SUFFERED
9 PERMANENT AND SEVERE PSYCHOLOGICAL AND SOCIAL DAMAGE DUE TO
10 MEMBERSHIP IN A RELIGIOUS GROUP WITHOUT KNOWING THE
11 INDIVIDUAL'S PSYCHOLOGICAL CONDITION PRIOR TO WHEN HE JOINED
12 THAT GROUP? DO YOU HAVE AN OPINION ON THAT?

13 A YES.

14 Q WHAT IS YOUR OPINION?

15 A I THINK IT IS ADVISABLE WHEN ONE IS MAKING A
16 DIAGNOSIS, THAT DEFINES AND DIAGNOSES A REACTION TO AN EVENT
17 IN AN INDIVIDUAL'S LIFE, THAT IT IS MANDATORY TO FIND OUT
18 WHAT THAT INDIVIDUAL WAS LIKE HISTORICALLY, WHAT HE WAS LIKE
19 HISTORICALLY BEFORE THAT EVENT OCCURRED.

20 Q SO FOR A GROUP, IT WOULD BE MANDATORY TO FIND
21 OUT WHAT THE INDIVIDUAL WAS LIKE BEFORE HE JOINED THE GROUP;
22 IS THAT WHAT YOU ARE SAYING?

23 A YES.

24 Q IN HER TESTIMONY, DR. SINGER SAID THAT THE WAY
25 SHE FOUND OUT WHAT MR. MULL WAS LIKE BEFORE HE JOINED THE
26 GROUP WAS THAT SHE READ THE MULL DEPOSITIONS, SHE READ MR.
27 MULL'S DEPOSITIONS TO LEARN WHAT HE WAS LIKE BEFORE HE
28 BECAME AFFILIATED WITH THE CHURCH. HAVE YOU READ THOSE

1 DEPOSITIONS?

2 A YES.

3 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. THAT IS
4 A MISCHARACTERIZATION OF DR. SINGER'S TESTIMONY.

5 THE COURT: SUSTAINED.

6 MR. KLEIN: I WILL READ YOU THE TESTIMONY OF DR.
7 SINGER. READING FROM PAGE 632 OF THE TESTIMONY.

8 "QUESTION," I AM READING LINE 20.

9 THE COURT: WHERE ARE YOU GOING TO STOP?

10 MR. KLEIN: I AM GOING TO STOP AT LINE 12 ON 633,
11 YOUR HONOR.

12 THE COURT: GO AHEAD.

13 MR. KLEIN: (READING.)

14 "QUESTION" BY MYSELF TO DR. SINGER,

15 "WITH RESPECT TO YOUR

16 CONCLUSIONS AS TO THE PERMANENT DAMAGE DONE
17 TO GREGORY MULL, AM I CORRECT -- LET ME
18 WITHDRAW THAT.

19 "WITH RESPECT TO THE PERMANENT
20 DAMAGES DONE TO GREGORY MULL, DID YOU DO
21 ANY KIND OF INVESTIGATION TO DETERMINE WHAT
22 GREGORY MULL WAS LIKE PRIOR TO 1974 WHEN HE
23 BECAME AFFILIATED WITH THE CHURCH?

24 "A YES, SIR.

25 "Q WHAT DID YOU DO?

26 "A I READ THE DEPOSITIONS THAT
27 WERE MADE AVAILABLE TO ME AND FROM THEM I
28 LEARNED THAT HE HAD BEEN A FUNCTIONING

1 BUILDER AND DESIGNER.

2 "Q ARE YOU TALKING ABOUT MR.
3 MULL'S DEPOSITION?

4 "A YES, SIR.

5 "Q YOU DIDN'T DO ANY INDEPENDENT
6 INVESTIGATION TO FIND OUT HOW SUCCESSFUL HE
7 WAS, SAY, PRIOR TO 1974, DID YOU?

8 "A NO, SIR. I DEPENDED UPON WHAT
9 WAS IN THE DEPOSITIONS.

10 "Q YOU DIDN'T DO ANY INVESTIGATION
11 TO FIND OUT IF HE WAS A DEPRESSED PERSON
12 PRIOR TO 1974, DID YOU?

13 "A NO, SIR."

14 Q NOW, MY QUESTION TO YOU IS --

15 MR. LEVY: IF I MAY, YOUR HONOR, I AM STILL GOING TO
16 OBJECT. THERE WAS ALSO IN DR. SINGER'S TESTIMONY THE FACTS
17 THAT SHE HAD TALKED TO MR. MULL'S DAUGHTER AND TO MR. MULL'S
18 FRIENDS PRIOR TO -- WHO KNEW HIM PRIOR TO HIS INVOLVEMENT AT
19 CAMELOT. I DON'T HAVE A COPY OF THE TESTIMONY OF DR.
20 SINGER, BUT I REMEMBER THE QUESTION SPECIFICALLY BECAUSE I
21 ASKED THEM AND THEN MR. KLEIN WENT OVER THEM AGAIN.

22 THE COURT: THERE WAS TESTIMONY TO THAT EFFECT.

23 MR. KLEIN: I AM NOT DENYING THERE WAS TESTIMONY, BUT
24 I SPECIFICALLY ASKED HER WHAT SHE BASED HER OPINION ON AND
25 THAT IS THE ANSWER SHE GAVE.

26 IF COUNSEL WANTS TO TAKE THIS DEPOSITION, I
27 HAVE NO PROBLEM. HE CAN ASK HIS QUESTIONS.

28 THE COURT: HE CAN HANDLE IT AT THE TIME OF

1 CROSS-EXAMINATION.

2 MR. KLEIN: THANK YOU, YOUR HONOR.

3 MR. LEVY: ONLY ONE FURTHER OBJECTION, YOUR HONOR.

4 MR. KLEIN IS DOING WHAT HE USUALLY DOES. HE IS TAKING A
5 PIECE OF THE TESTIMONY AS OPPOSED TO THE WHOLE. AND IT IS
6 MISCHARACTERIZATION. AND ON THAT BASIS, I OBJECT TO IT.

7 THE COURT: WHY DON'T YOU DIG OUT THE DEPOSITION
8 OR -- PARDON ME, THE TRANSCRIPT OF THE TESTIMONY.

9 WE WILL TAKE OUR MORNING RECESS AT THIS TIME.
10 YOU ALL DISCUSS IT. I WANT YOU TO SPEND THE RECESS TALKING
11 WITH EACH OTHER.

12 DO YOU HEAR ME?

13 MR. LEVY: YES, YOUR HONOR.

14 THE COURT: DO YOU HEAR ME?

15 MR. KLEIN: YES, YOUR HONOR.

16 (RECESS.)

17 THE COURT: PLEASE PROCEED.

18 MR. KLEIN: THANK YOU, YOUR HONOR.

19 Q DOCTOR, IF YOU WANTED TO FIND OUT WHAT AN
20 INDIVIDUAL'S PSYCHOLOGICAL CONDITION WAS PRIOR TO WHEN HE
21 JOINED ONE OF THESE GROUPS, IF YOU WANTED TO FIND THAT OUT
22 FOR THE PURPOSE OF REACHING YOUR CONCLUSION AS TO WHETHER HE
23 HAD BEEN PERMANENTLY PSYCHOLOGICALLY DAMAGED, WHAT KIND OF
24 INVESTIGATION WOULD BE NECESSARY IN ORDER TO FIND THAT PRIOR
25 INFORMATION OUT? WHAT WOULD YOU HAVE TO DO?

26 A IT HAS TO DO -- I AM SORRY. I TURNED IT OFF.

27 IT HAS TO DO WITH THE QUESTION OF RELIABILITY
28 AGAIN. I WOULD WANT TO CORROBORATE OR GET CONFLICTING

1 OPINION FROM INDIVIDUALS WHO HAVEN'T GOT A VESTED INTEREST
2 IN CONVINCING ME ONE WAY OR THE OTHER AS MUCH AS THAT IS
3 POSSIBLE. SOMETIMES THAT IS NOT POSSIBLE.

4 FAMILY MEMBERS, FRIENDS, MEDICAL DOCUMENTS,
5 SCHOOLING RECORDS, BUSINESS BACKGROUND, THE MORE EVIDENCE
6 YOU HAVE, THE MORE DATA THAT YOU HAVE ON AN INDIVIDUAL, A
7 PRIORI, BEFOREHAND, THE BETTER YOU ARE IN A POSITION TO MAKE
8 A STATEMENT ABOUT A CHANGE IN AN INDIVIDUAL'S PERSONALITY.
9 TO THE EXTENT THAT YOU HAVE VERY LITTLE, THEN YOU CAN MAKE
10 VERY LITTLE -- DRAW VERY LITTLE CONCLUSIONS.

11 Q WE HEARD TESTIMONY FROM DR. ROBERT MOORE WHO
12 TESTIFIED THAT MR. MULL'S BEHAVIOR WAS CONSISTENT WITH
13 POSITIVE AND THEN NEGATIVE TRANSFERENCE. WOULD YOUR
14 CONCLUSION WITH RESPECT TO HIS BEHAVIOR BE CONSISTENT WITH
15 THAT OF A TRUE BELIEVER? IS THAT IN ANY WAY INCONSISTENT
16 WITH WHAT DR. MOORE HAS TOLD US?

17 A NO. I DID NOT USE THE WORD TRANSFERENCE. I
18 DON'T KNOW THAT I WOULD. ESPECIALLY -- TRANSFERENCE IS A
19 PSYCHOANALYTIC TERM USED FOR THE THERAPEUTIC SITUATION
20 MAINLY. IT MEANS IMBUING AN INDIVIDUAL WHO IS
21 EXTRAORDINARILY IMPORTANT TO YOU IN SHAPING YOUR LIFE AT
22 THAT TIME WITH ALL KINDS OF CHARACTERISTICS HAVING LITTLE OR
23 NOTHING TO DO WITH THAT INDIVIDUAL.

24 IF IT IS POSITIVE, THEN THERE IS A GREAT DEAL
25 OF IDEALIZATION OF THAT INDIVIDUAL. AND THAT PERSON BECOMES
26 SYMOBLIC OF SOMETHING THAT IS IMPORTANT TO YOU FROM YOUR
27 PAST, MIGHT BE A PARENT MIGHT BE SOMETHING ELSE THAT YOU
28 NEED, A VOID IN YOUR LIFE.

1 A NEGATIVE TRANSFERENCE IS THE STAGE OF
2 DISILLUSIONMENT OR IT IS A PERIOD OF WHEN YOU IMBUE AGAIN
3 THE SAME -- IT MIGHT BE AN OBJECTIVE INDIVIDUAL, WHICH IS
4 WHAT A THERAPIST IS SUPPOSED TO BE, WITH ALL KINDS OF
5 NEGATIVE QUALITIES. YOU SEE THEM AS MALEVOLENT OR TERRIBLE
6 OR NO MATTER WHAT DEPENDING ON THAT STATE OF TRANSFERENCE
7 AND I THINK THAT IS WHAT DR. MOORE IS REFERRING TO. AGAIN I
8 DON'T USE THOSE WORDS.

9 Q YOU SAID THAT YOU STUDIED YESHIVOT?

10 A YESHIVOT IN HEBREW.

11 Q WHAT IS A YESHIVOT THAT YOU STUDIED?

12 A I STUDIED --

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

14 THE COURT: HE CAN ANSWER.

15 THE WITNESS: THESE ARE ORTHODOX JEWISH THEOLOGICAL
16 SEMINARIES.

17 Q BY MR. KLEIN: WHEN DID YOU MAKE THAT STUDY?

18 A THE YEAR THAT I LIVED IN ISRAEL, 19 -- MAINLY
19 1980. '79, '80.

20 Q WHY DID YOU MAKE THAT STUDY?

21 A WELL, FOR A COUPLE OF REASONS. ONE IS THAT
22 AGAIN I WAS INTERESTED IN BELIEF SYSTEMS AND WHAT MOTIVATES
23 PEOPLE TO MAKE A RADICAL DEPARTURE, WHICH IS WHAT I DEFINE
24 THESE THINGS ARE, WHEN SUDDENLY THEY SEEM TO BE MOVING
25 TOWARDS SCHOOL, TOWARDS PROFESSION AND THEY GIVE IT ALL UP
26 AND JOIN A MOVEMENT THAT IS EXTRAORDINARILY THREATENING TO
27 THEIR PARENTS AND THEY DON'T UNDERSTAND.

28 I STARTED GETTING CALLS FROM THE STATES AND

1904

1 CANADA, JEWISH PARENTS ABOUT THEIR KIDS OR JEWISH BROTHERS
2 AND SISTERS, SOMETIMES ABOUT PARENTS WHO WOULD JOIN JEWISH
3 THEOLOGICAL SEMINARIES. AND THEY HAD THE SAME KIND OF
4 CONCERN AS WHEN THEY JOIN A GROUP THAT IS COMMONLY DEPICTED
5 AS CULTS. NOT ONLY BECAUSE OF MY OWN HERITAGE, BUT I WAS
6 INTERESTED BECAUSE I WANTED TO SEE SIMILARITIES IN DIFFERENT
7 BELIEF SYSTEMS.

8 Q BASED ON YOUR STUDY OF YESHIVOTS, WHAT ARE THE
9 SIMILARITIES BETWEEN THE NEW AGE RELIGIONS YOU STUDIED AND
10 THE YESHIVOTS?

11 A I WANT TO BE VERY CAREFUL HERE BECAUSE I DON'T
12 WANT TO GET -- DON'T WANT TO SAY THE WRONG THING TO INSULT
13 ANYBODY.

14 I FIND THAT THERE ARE STRONG SIMILARITIES IN
15 ANY INTENSE -- ANY INTENSE GROUP BELIEF SYSTEM. THE
16 YESHIVOT -- I STUDIED FIVE OVER THE PERIOD OF THE YEAR. ALL
17 HAVE A VERY -- A FAIRLY RIGID HIERARCHY. THERE WAS ONE
18 INDIVIDUAL AT THE TOP.

19 THERE ARE STRONG AND INTENSIVE RITUALS THAT GO
20 ON FROM EARLY MORNING THROUGHOUT THE DAY AND TO THE NIGHT.
21 THERE ARE STRICT RULES REGARDING DRESS, DEMEANOR, DIET,
22 SEXUALITY, BEHAVIOR CONTROL IN THAT RESPECT.

23 THERE IS A STRONG GROUP SOLIDARITY AND
24 PRESSURE, THERE IS AN OVERRIDING IDEOLOGY. THERE IS AN
25 IMPLICIT PAYOFF, SO TO SPEAK, IN A REWARD IN ONE GETS CLOSE
26 TO GOD BY, AND ONLY ONE WAY, THROUGH THE TORAH.

27 THERE IS A SUSPICIOUSNESS OF OUTSIDERS, EVEN
28 JEWISH OUTSIDERS WHO ARE NOT ORTHODOX, FOR EXAMPLE ME. AND

1 FOR EXAMPLE RABBI ROBBINS OR OTHER PEOPLE WHO ARE NOT
2 ORTHODOX IN THE WAY THEY ARE PERCEIVED.

3 SO THERE ARE VERY STRONG SIMILARITIES. AND
4 AGAIN, THOSE SIMILARITIES ARE COMMON TO MOST OF THE GROUPS
5 THAT I HAVE LOOKED AT.

6 Q DID THE MEMBERS OF THE YESHIVOT GET PAID?

7 A NO. THEY PAID FEES FOR THE MOST PART. THEY
8 PAID FEES OR THE FAMILIES DID OR THEY WERE SUBSIDIZED IN
9 ORDER TO PAY FEES. IT IS A SEMINARY SO IT IS SORT OF
10 TUITION OR RESIDENT FEES.

11 Q WHAT EXPERTISE, IF ANY, DO YOU HAVE IN THE AREA
12 OF HYPNOSIS?

13 A I TRAINED IN HYPNOSIS WHEN I WAS A RESIDENT. I
14 LEARNED THE THEORY AND THE PRACTICE, CAN INDUCE HYPNOTIC
15 TRANCES. USED IT IN CLINICAL SITUATIONS IN MY EARLY
16 CLINICAL CAREER AND AS A RESIDENT. HAVE NOT USED IT IN THE
17 LAST 15 YEARS.

18 Q WHAT, IF ANY, DISCUSSIONS HAVE YOU HAD WITH
19 HYPNOTISTS RELATING TO NEW AGE RELIGIONS OR CULTS OR
20 WHATEVER WORD YOU WANT TO USE?

21 A IN THE COURSE OF OUR --

22 MR. LEVY: YOUR HONOR, I AM GOING TO OBJECT TO THE
23 LINE OF QUESTIONING. IT DOES CALL FOR HEARSAY.

24 THE COURT: HE CAN ANSWER.

25 THE WITNESS: IN THE COURSE OF OUR COMMISSION WORK,
26 AND THE SECTION THAT I DIRECTED WAS THE HEALTH AND MENTAL
27 HEALTH ASPECT, WE INTERVIEWED HYPNOTISTS TO FIND OUT WHAT
28 THEIR OPINION WAS AS TO THE INVOKING OF INDUCING OF TRANCES

1 AND THE GENERALIZATION FROM ONE SITUATION TO ANOTHER, THAT
2 IS A CLINICAL SITUATION TO AN INTENSE BELIEF SYSTEM.

3 I HAVE DERIVED MY OWN CONCLUSIONS IRRESPECTIVE
4 OF WHAT THEY SAID, BUT WHAT THEY SAID CORROBORATED WHAT MY
5 FEELINGS WERE HAVING SEEN THESE GROUPS.

6 Q BY MR. KLEIN: DO YOU HAVE AN OPINION AS TO
7 WHETHER TRUE BELIEVERS ARE HYPNOTIZED?

8 A YES, I DO HAVE AN OPINION.

9 Q WHAT IS THAT OPINION?

10 MR. LEVY: YOUR HONOR, I AM GOING TO HAVE TO OBJECT.
11 IT DOES CALL FOR A CONCLUSION WITH REGARD TO WHICH TRUE
12 BELIEVER THIS GENTLEMAN IS TALKING ABOUT.

13 THE COURT: HE CAN ANSWER.

14 THE WITNESS: HYPNOSIS IS A CLINICAL TOOL AND IS USED
15 TO GET AT PRECONSCIOUS AND UNCONSCIOUS MATERIAL OR TO
16 UTILIZE POST-HYPNOTIC SUGGESTION. IT IS A LIMITED TOOL.

17 I STUDIED WITH TWO OF THE FATHERS OF THAT
18 TECHNIQUE, ERNEST HILEGARD AND MILTON ERICSON. LEARNED
19 THEIR THEORIES. IT IS ALSO USED IN SHOW BUSINESS. WHEN AN
20 INDIVIDUAL IS HYPNOTIZED, HE IS IN AN ALTERED STATE OF
21 CONSCIOUSNESS, HE IS IN A TRANCE STATE.

22 I HAVE NOT SEEN INDIVIDUALS IN THESE RELIGIOUS
23 MOVEMENTS AS -- AT TIMES AS OFFENSIVE AS THEY MAY BE TO ME
24 AS TRUE BELIEVERS PERSONALLY. IF THEY ARE, I HAVE NOT SEEN
25 THEM AS HYPNOTIZED OR IN A TRANCE STATE.

26 I THINK WE ARE TALKING ABOUT TWO SEPARATE
27 ISSUES HERE. IF YOU ASK ME -- TO ME, I HAVE NOT SEEN ANY
28 EVIDENCE WHATSOEVER THAT THIS IS HYPNOSIS.

1907

1 Q BY MR. KLEIN: ALL YOUR COUNSELING WORK, YOUR
2 FIELD WORK, YOU HAVE REVIEWED THE LITERATURE AND EDUCATIONAL
3 BACKGROUND, HAVE YOU EVER SEEN ANY EVIDENCE OF ANY
4 INDIVIDUAL OR GROUP, NOT JUST TRUE BELIEVERS, ANY INDIVIDUAL
5 OR GROUP BEING HYPNOTIZED BY A RELIGIOUS OR NEW AGE
6 RELIGIOUS LEADER?

7 A YOU KNOW WE USE THE WORD HYPNOSIS, HYPNOTIZE
8 AND MESMERIZE IN COMMON COLLOQUIAL ENGLISH. I HAVE SEEN
9 PEOPLE GREATLY INFLUENCED, UNDER THE SWAY, AT ROCK CONCERTS
10 AND OTHER KIND OF TREMENDOUS EMOTIONAL EXPERIENCES. IF YOU
11 WANT TO CALL THAT HYPNOSIS, THEN WE ARE -- WE ARE NOT
12 TALKING ABOUT THE ISSUE OF CLASSICAL HYPNOTISM RIGHT NOW.
13 SO I WOULD HAVE TO ANSWER NO.

14 Q WHAT DOES IT MEAN PSYCHIATRIC PATHOLOGY? WHAT
15 DOES THAT TERM MEAN?

16 A IT JUST REFERS TO -- THE MEDICAL MODEL REFERS
17 TO EMOTIONAL DISORDERS THAT WE STUDY, CLASSIFIED UNDER
18 SOMETHING CALLED D.S.M. 3, DIAGNOSTIC AND STATISTICAL MANUAL
19 3, THE PSYCHOSIS OF THE BRAIN THAT WE STUDY IN PSYCHIATRY.
20 IT IS THE MEAT OF OUR WORK.

21 Q IT IS THE EXISTENCE OF EMOTIONAL PROBLEMS?

22 A RIGHT. IT REFERS TO A DIAGNOSTIC
23 CLASSIFICATION.

24 Q IT IS AN ABNORMALITY?

25 A YES.

26 Q IN ALL OF YOUR STUDIES OF RELIGIOUS GROUP
27 MEMBERS, HAVE YOU SEEN A GREATER INCIDENCE OF PSYCHIATRIC
28 PATHOLOGY IN CULT MEMBERS, NEW AGE RELIGION MEMBERS, THAN

1 YOU WOULD EXPECT TO SEE IN A COMPARABLE SEGMENT OF THE
2 POPULATION WHO HAD NOTHING TO DO WITH CULTS OR NEW AGE
3 RELIGIONS?

4 A NO.

5 Q CAN YOU TELL US WHICH, IF ANY, RECOGNIZED
6 AUTHORITIES AGREE WITH THE GENERAL CONCLUSIONS THAT YOU'VE
7 STATED TO US TODAY?

8 A THERE ARE NUMEROUS SCIENTISTS, BEHAVIORAL
9 SCIENTISTS AND OTHERS IN THE FIELD WHO HAVE DONE FIELD WORK
10 AND WHO AGREE WITH WHAT I HAVE SAID.

11 Q COULD YOU NAME SOME OF THEM?

12 A THERE'S E. MANSELL PATTISON, WHO WAS AT
13 U.C.L.A. AND IS NOW CHAIRMAN OF THE DEPARTMENT OF PSYCHIATRY
14 IN GEORGIA WHO CALLS THESE GROUPS --

15 MR. LEVY: I AM GOING TO OBJECT TO THIS, YOUR HONOR.
16 IT IS HEARSAY.

17 THE COURT: HE CAN ANSWER.

18 THE WITNESS: CALLS THESE GROUPS ALTERNATIVE HEALING
19 NETWORKS AS OPPOSED TO THE DANGEROUS GROUPS THEY ARE
20 PORTRAYED TO BE. THAT IS, HE SEES THERAPEUTIC QUALITIES IN
21 THESE GROUPS.

22 THERE IS HARVEY COX WHO IS PROFESSOR OF
23 DIVINITY AND THEOLOGY AT HARVARD MEDICAL SCHOOL. THERE IS
24 MARK GALATER, PROFESSOR OF PSYCHIATRY AT COLUMBIA WHO IS A
25 REKNOWNED AUTHORITY AND IS WRITING A BOOK ON THIS AREA --
26 EDITING A BOOK ON THIS AREA FOR THE AMERICAN PSYCHIATRIC
27 ASSOCIATION TO WHICH I AM CONTRIBUTING. THE BOOK IS JUST
28 STARTING TO BE GENERATED NOW.

1 THERE IS THOMAS UNGERLEIDER, PROFESSOR OF
 2 PSYCHIATRY AT U.C.L.A. THERE IS IRVING ZARETSKY, WHO IS A
 3 PROFESSOR OF SOCIOLOGY AT PRINCETON. THERE IS SOME OTHERS.
 4 RAYMOND PRINCE, WHO IS NOW A DEAN OF PROFESSOR OF PSYCHIATRY
 5 AT MC GILL UNIVERSITY. LEE COLEMAN IS A PSYCHIATRIST AT
 6 U.C. BERKELEY. HELEN MENIERE IS THE PRESIDENT OF THE
 7 RESEARCH COMMITTEE ON SECTS AND PARALLEL THERAPIES.

8 AND THERE ARE OTHER AUTHORS AROUND THE WORLD
 9 WHO HAVE CORROBORATED THESE FINDINGS. GALATER'S WORK, WHO
 10 SPECIFICALLY WORKS AT CULTS. MARK GALATER DID A STUDY OF
 11 UNIFICATION CHURCH MEMBERS, MOONIES AND HARE KRISHNA MEMBERS
 12 AND FOUND NO GREATER INCIDENCE AND PREFERENCE IN EMOTIONAL
 13 DISORDERS IN THE MEMBERSHIP THAN IN THE GENERAL POPULATION.

14 WE HAVE EPIDEMIOLOGICAL STUDIES ABOUT
 15 DISTRIBUTION OF EMOTIONAL DISORDERS AND GENERAL POPULATION
 16 AGE GROUPS, PEER GROUPS.

17 MR. KLEIN: THANK YOU VERY MUCH.

18 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

19 MR. LEVY: THANK YOU, YOUR HONOR.

20
 21 CROSS-EXAMINATION

22 BY MR. LEVY:

23 Q DR. LEVINE, FIRST A FEW BASIC QUESTIONS TO GET
 24 A FEW THINGS OUT OF THE WAY. AS A PROFESSIONAL, WOULD I BE
 25 INCORRECT IN ASSUMING THAT YOU ARE BEING PAID A FEE FOR YOUR
 26 APPEARANCE HERE TODAY?

27 A I AM BEING PAID AS AN EXPERT WITNESS. I AM NOT
 28 BEING PAID TO TESTIFY. MY TIME IS BEING PAID FOR TO GO OVER

1 THE TESTIMONY.

2 Q EXCUSE ME, SIR. I DIDN'T SUGGEST YOU WERE
3 BEING PAID TO TESTIFY. MY STATEMENT TO YOU WAS YOU WERE
4 BEING PAID FOR YOUR TIME AND YOUR APPEARANCE HERE IN COURT?

5 A YES, YOU ARE CORRECT.

6 Q MOST PROFESSIONALS GET PAID WHEN THEY APPEAR IN
7 COURT, DON'T THEY, AND TESTIFY AS AN EXPERT WITNESS?

8 A I DON'T KNOW, ACTUALLY. THAT IS NOT AN AREA OF
9 MY EXPERTISE.

10 Q HAVE YOU EVER APPEARED AS AN EXPERT WITNESS
11 ANYWHERE WHERE YOU DIDN'T GET PAID?

12 A YES, ABSOLUTELY.

13 Q HAVE YOU EVER APPEARED FOR CHURCH UNIVERSAL AND
14 TRIUMPHANT ANYWHERE WHERE YOU DIDN'T GET PAID?

15 A NEVER APPEARED FOR CHURCH UNIVERSAL AND
16 TRIUMPHANT ANYWHERE.

17 Q YOU ARE HEAD OF THE DEPARTMENT OF PSYCHIATRY AT
18 SUNNYBROOKE MEDICAL CENTER IN TORONTO; IS THAT CORRECT?

19 A YES.

20 Q HAVE YOU EVER NOTICED THAT MOST MEDICAL
21 FACILITIES DEALING WITH PSYCHIATRIC OR PSYCHOLOGICAL
22 PROBLEMS ARE -- THEY ALMOST ALWAYS HAVE SOOTHING NAMES LIKE
23 SUNNYBROOKE OR PLEASANT VALLEY OR WHISPERING SPRINGS?

24 A WE HAVE FIVE GENERAL TEACHING HOSPITALS IN THE
25 UNIVERSITY. SUNNYBROOKE HAPPENS TO BE A BEAUTIFUL LOCATION
26 ON A BEAUTIFUL GREEN CAMPUS. IT IS APPROPRIATE IN THIS
27 CASE.

28 Q WOULD I BE CORRECT IN ASSUMING THAT A PLEASANT

1911

1 NAME CONVEYS A PEACEFUL AND A SERENE FEELING?

2 A I DON'T KNOW. THAT DEPENDS TO YOU OR TO ME. I
3 AM NOT SURE -- I DON'T KNOW THAT I WOULD DRAW THAT
4 CONCLUSION. I WOULD HAVE TO DO SOME RESEARCH ON IT.

5 Q WELL, DEATH VALLEY CERTAINLY MIGHT BE JUST A
6 LITTLE BIT DIFFERENT FROM SUNNYBROOKE, WOULDN'T YOU SAY?

7 A NOT NECESSARILY. DEATH VALLEY IS BEAUTIFUL.

8 Q YOU ARE FAMILIAR WITH THIS CHURCH, CHURCH
9 UNIVERSAL AND TRIUMPHANT, ARE YOU NOT?

10 A NOT REALLY, NO. I AM FAMILIAR ONLY IN TERMS OF
11 WHAT I HAVE READ, WHICH I TESTIFIED TO BEFORE. THAT'S ALL.

12 Q HAVE YOU EVER INTERVIEWED ANYBODY WHO IS A
13 MEMBER OF THIS CHURCH?

14 A NO.

15 Q HAVE YOU EVER INTERVIEWED ANYBODY WHO IS AN
16 EX-MEMBER OF THIS CHURCH?

17 A NO.

18 Q YOU ARE AWARE THAT THEIR CAMPUS AT CALABASAS IS
19 CALLED CAMELOT?

20 A YES.

21 Q WOULD YOU AGREE THAT CAMELOT MIGHT EVOKE SOME
22 PLEASANT THOUGHTS LIKE KING ARTHUR AND THE ROUND TABLE AND
23 LOVELY MAIDENS?

24 A MR. LEVY, I WOULD SAY NOT NECESSARILY TO ME.
25 REALLY. I AM BEING TOTALLY --

26 Q YOU NEVER READ ABOUT KING ARTHUR AND THE
27 KNIGHTS OF THE ROUND TABLE?

28 A YES, I DID. BUT CAMELOT IN THIS PARTICULAR

1 CONTEXT DOES NOT CONJURE UP THOSE PARTICULAR IMAGES TO ME.

2 Q WOULD IT BE A FAIR STATEMENT, DOCTOR, TO SAY
3 THAT THE NAME CAMELOT MIGHT BE MORE APPEALING THAN CHURCH
4 UNIVERSAL'S INDOCTRINATION AND RECRUITMENT CENTER?

5 MR. KLEIN: I AM GOING TO OBJECT TO THAT AS NOT BEING
6 BASED ON FACTS IN EVIDENCE, YOUR HONOR, AND ARGUMENTATIVE.

7 THE COURT: HE CAN ANSWER.

8 THE WITNESS: YES.

9 Q BY MR. LEVY: NOW, YOU HAVE TOLD US ALL ABOUT
10 YOUR EXTENSIVE BACKGROUND WITH HYPNOSIS. ARE YOU FAMILIAR
11 WITH MASS HYPNOSIS TECHNIQUES?

12 A I AM FAMILIAR WITH SHOW BUSINESS MASS HYPNOSIS
13 TECHNIQUES. I TOOK PART IN A COUPLE OF EXPERIMENTS YEARS
14 AGO WHERE A GROUP HYPNOTIST HYPNOTIZED LARGE GROUP OF
15 INDIVIDUALS. I THINK THERE WERE ABOUT 200 OR MORE IN THE
16 AUDIENCE AT THE SAME TIME. EXCEPT THOSE OF US WHO DIDN'T
17 WANT TO BE HYPNOTIZED. AND WE WEREN'T HYPNOTIZED.

18 Q YOUR TESTIMONY IS IN ACCORD WITH SOME OTHER
19 PERSON WHO TESTIFIED HERE WHO KNOWS ABOUT HYPNOSIS, A LOT OF
20 PEOPLE DON'T WANT TO BE HYPNOTIZED, THEY FIGHT AGAINST IT
21 AND THEY ARE NOT HYPNOTIZED.

22 WOULD YOU SAY THAT GROUP INDUCTIONS ARE NOT
23 UNUSUAL IN -- YOU USED THE TERM SHOW BUSINESS AND YOU ALSO
24 LIKENED HYPNOTISM TO MESMERISM OR THAT KIND OF FEELING THAT
25 YOU GET WHEN YOU GO TO A GROUP WHEN YOU REALLY GET CAUGHT UP
26 IN WHAT'S GOING ON. LIKE A TENT SHOW?

27 A LIKE A TENT SHOW?

28 Q TENT SHOW MAYBE OR A CIRCUS OR AFFAIR?

1 A YES. I WAS USING THE WORD COLLOQUIALLY AT THAT
2 POINT IN TIME. NOT SPECIFICALLY AS A CLINICAL ENTITY. BUT
3 CERTAINLY I HAVE SEEN PEOPLE SWEEPED UP TOTALLY EMOTIONALLY,
4 COGNITIVELY IN WHATEVER THEY HAPPEN TO BELIEVE IN. AND THEY
5 WANT TO. THEY WANT -- THERE IS TOTAL COMPLICITY, SO TO
6 SPEAK. IF THEY DON'T WANT TO, THEY ARE NOT.

7 Q IS IT POSSIBLE THAT SUGGESTIBILITY MIGHT WORK
8 ON SOMEONE WHETHER THEY WANTED TO OR THEY DIDN'T WANT TO?

9 A I WOULD SAY I GUESS IT IS POSSIBLE, MR. LEVY.
10 BUT I WOULD SAY THERE WOULD HAVE TO BE SOME DEGREE OF
11 MOTIVATION. THAT IS IF THERE IS AN ACTIVE FIGHTING AGAINST
12 BEING HYPNOTIZED OR CAPTIVATED, IT IS NOT GOING TO WORK.

13 Q WHAT IF YOU GO TO SOMETHING THAT APPARENTLY YOU
14 ARE ENJOYING WHILE YOU GO THERE. AND THEN WHOEVER IS IN
15 CHARGE ATTEMPTS TO USE SOME GROUP SUGGESTIBILITY TECHNIQUES.
16 AND YOU HAVE NO REASON TO BE FIGHTING AGAINST YOUR
17 PARTICIPATION. WOULD THEN GROUP SUGGESTIBILITY HAVE AN
18 EFFECT ON THAT TYPE OF INDIVIDUAL?

19 MR. KLEIN: I AM GOING TO JUST OBJECT AS TO THE
20 AMBIGUITY OF GROUP SUGGESTIBILITY TECHNIQUES, WHAT THAT
21 MEANS, YOUR HONOR.

22 THE COURT: CAN YOU ANSWER?

23 THE WITNESS: WELL, I THINK -- I AM NOT EXACTLY SURE
24 WHAT MR. LEVY MEANS, BUT I THINK THE ANSWER PEOPLE CAN BE
25 SUGGESTIBLE AND CAN BE INFLUENCED TO SOME EXTENT BY A
26 SEDUCTIVE GROUP THAT IS CAPTIVATING THEM AND SWAYING THEM.
27 IT DOES NOT MEAN THAT THEY ARE HYPNOTIZED. IT MEANS THEY
28 ARE ENTHRALLED, INVOLVED, COMMITTED.

1914

1 Q BY MR. LEVY: MESMERIZED IN THE COLLOQUIAL
2 SENSE?

3 A IN THE COLLOQUIAL SENSE. I WOULD LIKE TO
4 UNDERLINE THAT.

5 Q HAVE YOU EVER HEARD OF SUBLIMINAL TECHNIQUES?

6 A HEARD OF THEM.

7 Q YOU KNOW ANYTHING ABOUT THEM?

8 A MINIMAL. ACTUALLY WHAT I HAVE HEARD IS THAT AS
9 FAR AS HYPNOSIS IS CONCERNED, THAT THERE IS A GREAT QUESTION
10 AS TO THEIR BOTH VALIDITY AND EFFECTIVENESS.

11 Q ARE YOU AWARE THAT IN THE UNITED STATES THEY
12 HAVE BEEN OUTLAWED IN MANY, MANY STATES THE SUBLIMINAL TYPE
13 OF ADVERTISING --

14 A NO, I AM NOT AWARE.

15 Q SO THAT WHEN YOU GO IN A DEPARTMENT STORE, YOU
16 GO INTO SOME OTHER STORE, THE STORE CANNOT PLAY THIS
17 SUBLIMINAL TAPES BEHIND THE MUSIC THAT THEY PLAY TO AFFECT
18 WHETHER OR NOT YOU WILL MAKE EXORBITANT PURCHASES?

19 A NO, I WAS NOT AWARE OF THAT.

20 Q THEY ALSO DO THE SAME THING WITH REGARD TO
21 SHOPLIFTING. WHAT THEY DO IS PLAY SUBLIMINAL TAPES. AND
22 THAT ALSO HAS BEEN OUTLAWED. ARE YOU AWARE OF THAT?

23 A NO.

24 Q WOULD IT BE FAIR TO SAY THAT THE DESIRE OF A
25 PERSON WHO BECOMES INVOLVED IN ONE OF THESE NEW WAVE
26 ORGANIZATIONS, THAT THAT DESIRE TO PLEASE THE LEADER OR TO
27 BE COOPERATIVE IS INTENSIFIED IF THEY ARE IN A CLOSED
28 SOCIETY? WHEN I SAY CLOSED SOCIETY, I MEAN A GROUP THAT IS

1 COMPOSED OF PRIMARILY MEMBERS OF THAT NEW WAVE ORGANIZATION.

2 A COULD YOU REPEAT THAT, PLEASE, MR. LEVY? I AM
3 AFRAID I LOST YOU, I AM SORRY. I THOUGHT YOU WERE GOING IN
4 ANOTHER DIRECTION. I MISSED THE THRUST OF YOUR QUESTION.

5 Q NOW, WE ARE RESTRICTING OURSELVES TO NEW WAVE
6 ORGANIZATION. WHAT I WANT TO KNOW, IF IT WOULD BE IN YOUR
7 OPINION, YOUR EXPERT OPINION AS A PSYCHIATRIST --

8 A RIGHT.

9 Q -- WOULD IT BE ACCURATE TO SAY THAT THE DESIRE
10 TO PLEASE A LEADER OR TO BE COOPERATIVE IS GENERALLY
11 INTENSIFIED WHEN YOU ARE IN THE CLOSED SOCIETY THAT IS
12 LIMITED JUST TO MEMBERS OF WHATEVER NEW WAVE ORGANIZATION
13 SUCH AS SAY CHURCH UNIVERSAL AND TRIUMPHANT HERE?

14 A WITHIN THE PARAMETERS OF YOUR QUESTION, I WOULD
15 SAY YES.

16 Q WHAT IS A DOUBLE BIND IN YOUR JARGON?

17 A DOUBLE BIND IS REALLY SIMULTANEOUS MESSAGE, TWO
18 CONFLICTING MESSAGES FROM WHICH THE INDIVIDUAL, IN A SENSE,
19 CAN'T ESCAPE. OUR JARGON "DOUBLE BIND" WAS ORIGINALLY USED
20 IN THE FIELD OF FAMILY DYNAMICS AND FAMILY THERAPY BUT CAN
21 BE APPLIED IN ALMOST ANY KIND OF SITUATION AS IN CATCH-22
22 WHERE YOU CAN'T WIN FOR LOSING, WHICH IS ESSENTIALLY WHAT IT
23 MEANS. NO MATTER WHAT YOU DO, YOU ARE ESSENTIALLY -- YOU
24 CAN'T HAVE IT BOTH WAYS AT THE SAME TIME.

25 Q AND IF ONE OF THESE NEW WAVE GROUPS WERE TO
26 TEACH THAT, THE ONLY WAY TO GOD AND YOUR ASCENSION IS
27 THROUGH THE FOLLOWINGS OF THAT PARTICULAR NEW WAVE GROUP,
28 AND THEY LEFT IT AT THAT, WOULD NOT THE OTHER CONCLUSION BE

1916

1 IF YOU DON'T FOLLOW AND YOU DON'T PARTICIPATE, YOU DON'T GET
2 THERE?

3 A I HAVE SEEN THIS IN ALMOST EVERY GROUP THAT --

4 Q THAT IS NOT MY QUESTION AND I AM NOT CONCERNED
5 WITH WHETHER YOU HAVE SEEN IT IN EVERY GROUP. I AM ASKING A
6 SPECIFIC QUESTION AND I'D LIKE, FOR ONCE, A SPECIFIC ANSWER.

7 A I BELIEVE I'VE ANSWERED YOU SPECIFICALLY
8 BEFORE, MR. LEVY. MORE THAN ONCE.

9 Q LET ME APOLOGIZE, DOCTOR. IT IS NOT A PERSONAL
10 THING BETWEEN YOU AND I. I WOULD JUST LIKE A PARTICULAR
11 ANSWER TO A PARTICULAR QUESTION AT THIS TIME.

12 A I AM SORRY. AGAIN, I AM GOING TO HAVE TO ASK
13 CAN THAT BE REPEATED? I -- I LOST IT AGAIN.

14 Q OKAY. LET ME TRY TO HELP YOU GET IT BACK.
15 WITH REGARD TO A DOUBLE BIND, IF SOMEONE BECOMES A MEMBER OF
16 A PARTICULAR NEW WAVE GROUP AND THAT NEW WAVE GROUP TELLS
17 THEM THERE IS ONLY ONE WAY TO SALVATION AND ONE WAY TO THEIR
18 ASCENSION, AND THAT IS THROUGH THE TEACHINGS OF THAT
19 PARTICULAR GROUP, AND THEY STOP THERE, IS NOT THE
20 INESCAPABLE CONCLUSION THAT IF YOU DON'T DO IT OUR WAY, YOU
21 DON'T DO IT?

22 A YES. BUT THIS IS -- CAN I GO ON?

23 Q TAKE OFF. GO WHEREVER YOU LIKE.

24 A OKAY. THIS IS -- WE ARE TALKING NOW ABOUT AN
25 INDIVIDUAL WHO IS COMMITTED TO THAT PARTICULAR IDEOLOGY AND
26 TO THAT PARTICULAR GROUP AND LEADERSHIP AND THE ANSWER IS
27 YES UNDER THOSE CIRCUMSTANCES. BUT THERE IS ALREADY A
28 COMMITMENT TO THAT ASCENSION, FOR EXAMPLE, OR ANY OTHER

1 IMPLICIT OR EXPLICIT PAYOFF.

2 Q DOCTOR, AMONG ALL THOSE ARTICLES AND EVERYTHING
3 YOU'VE TOLD US ABOUT, YOU CONTRIBUTED TO AN ARTICLE IN A
4 PUBLICATION CALLED "PSYCHOLOGY TODAY," DID YOU NOT?

5 A YES.

6 Q AND THAT WAS IN -- I THINK IT WAS AUGUST OF
7 1984, WAS IT NOT?

8 A CORRECT.

9 Q I HAVE GOT A COPY OF IT HERE WITH ME. IT
10 STARTS OFF -- IT SAYS THAT IT TALKS ABOUT RADICAL
11 DEPARTURES. THAT IS THE NAME OF YOUR BOOK, IS IT NOT?

12 A RIGHT.

13 Q "LEAVING HOME TO JOIN AN IDEOLOGICAL COMMUNE IS
14 A DESPERATE MOVE BUT IN THE END IT IS USUALLY A BENIGN AND
15 THERAPEUTIC EXPERIENCE. BY DR. SAUL V. LEVINE." THAT IS
16 YOU, IS IT NOT?

17 A YES, MR. LEVY.

18 Q HAVE YOU EVER HEARD OF ANYONE JOINING A COMMUNE
19 WHERE THE EXPERIENCE WAS NOT THERAPEUTIC OR BENIGN?

20 A YES, I HAVE. THAT PARTICULAR ARTICLE, MR.
21 LEVY, THAT PARTICULAR ARTICLE WAS AN EXCERPT FROM MY BOOK.
22 THAT PARTICULAR STATEMENT WAS, IN THE FOLLOWING ISSUE,
23 ELABORATED UPON BY ME IN RESPONSE TO A LETTER WRITTEN BY DR.
24 SINGER, AS A MATTER OF FACT.

25 THERE ARE INDIVIDUALS FOR WHOM GROUPS ARE NOT
26 NECESSARILY BENIGN. I HAVE YET TO SEE AN INDIVIDUAL FOR
27 WHOM A GROUP IS NOT BENIGN WHO HAD SOME EMOTIONAL PROBLEMS
28 DURING THE GROUP OR AFTER THE GROUP WHO DID NOT HAVE

1918

1 SIGNIFICANT PROBLEMS BEFORE THE GROUP.

2 Q I WOULD SAY THAT IS A FAIR STATEMENT. IS IT A
3 POSSIBILITY THAT SOMEONE WHO HAD PROBLEMS BEFOREHAND, OR
4 DOES THE POSSIBILITY EXIST THAT SOMEONE WHO HAD PROBLEMS
5 BEFOREHAND WOULD BE SUBJECTED TO GREATER STRESS, GREATER
6 EMOTIONS, THAN SOMEONE WHO DID NOT HAVE PSYCHOLOGICAL
7 PROBLEMS BEFOREHAND?

8 A IT IS POSSIBLE. IT IS A POSSIBILITY.

9 I HAVE SEEN INDIVIDUALS HOWEVER WHO HAVE BEEN
10 IN VARIOUS STATES OF DISORDER WHO HAVE IN FACT BEEN HELPED
11 BY THE GROUPS. THAT IS WHY DR. PATTISON CALLED IT AN
12 ALTERNATIVE HEALING NETWORK.

13 THAT, IN FACT, THE DEGREE OF STABILITY AND THE
14 OVERRIDING BELIEF SYSTEM AND THE BELIEF IN THE POWERS OF THE
15 PARTICULAR GROUP AND THE SUPPORT OF THE GROUP ITSELF ARE
16 ACTUALLY THERAPEUTIC OR BENEFICIAL TO THAT INDIVIDUAL FOR
17 THE TIME THEY ARE IN THE GROUP.

18 Q LET ME ASK YOU THIS. IN YOUR OPINION, WHAT IS
19 A CULT?

20 A IT IS A WORD THAT I NO LONGER USE BECAUSE IT
21 HAS BECOME A TOTALLY PEJORATIVE. IT IS A FOUR-LETTER WORD.
22 BUT A CULT AS DEFINED BY THE JEWISH BOARD OF GUARDIANS IN
23 PHILADELPHIA A FEW YEARS AGO IS A GROUP OF PEOPLE WITH A
24 STRONG OVERRIDING IDEOLOGY WITH COMMITMENT TO A LEADER WHO
25 IS DEIFIED, THE LEADER IS USUALLY LIVING BUT SOMETIMES
26 DECEASED, AND IMBUED WITH ALL KINDS OF MAGICAL
27 CHARACTERISTICS WHO ARE SUSPICIOUS OF THE OUTSIDE WORLD,
28 SOMETIMES HOSTILITY.

1919

1 AND I ELABORATE ON THAT DEFINITION TO SAY THERE
2 ARE UNIQUE RULES FOR THAT PARTICULAR GROUP. THEY ALL HAVE
3 RULES. AND A UNIQUE USE OF LANGUAGE. BUT AS I SAID AND I
4 FEEL VERY STRONGLY ABOUT, WHAT IS A CULT IS IN THE EYE OF
5 THE BEHOLDER BECAUSE WHAT MIGHT BE A CULT TO YOU MIGHT NOT
6 BE TO ME AND VICE VERSA.

7 Q YOU ARE THE EXPERT, DOCTOR. THAT IS WHY I AM
8 ASKING YOU. YOU GENERALLY -- YOU JUST SAID THAT YOU
9 CONSIDER CULT A PEJORATIVE TERM?

10 A YES.

11 Q YOU MEAN BY THAT A DISPARAGING TERM?

12 A YES.

13 Q YOU CHOOSE TO CALL CULTS -- I NOTE IN YOUR
14 ARTICLE -- LET ME READ FROM YOUR ARTICLE, PAGE 23, IT SAYS,
15 "BECAUSE THESE GROUPS DON'T EASILY LEND THEMSELVES TO
16 EXISTING TERMINOLOGY, I HAVE CHOSEN THE RATHER INEXACT TERM
17 'RADICAL' TO DESCRIBE BOTH THE GROUPS AND THE JOINING THAT
18 MAKES THEM POSSIBLE."

19 A RIGHT.

20 Q WITH REGARD TO YOUR DETERMINATION THAT THE WORD
21 "CULT" IS PEJORATIVE, YOU SAID, "I HAVE SEEN BAD THINGS.
22 BUT IN THE HUNDREDS OF GROUPS I KNOW OF FIRSTHAND, I HAVE
23 NEVER SEEN EXCESSES WORTHY OF THE PEJORATIVE LABEL OF
24 'CULT.'"

25 IS THAT AN ACCURATE STATEMENT?

26 A YES.

27 Q NOW, ON PAGE 23, YOU TALK ABOUT WHAT THE PRESS
28 HAS REPORTED. YOU WRITE THAT:

1920

1 "THE PRESS REPORTS INCLUDE
2 THINGS LIKE SOME OF THESE NEW WAVE GROUPS
3 WERE CONTROLLED BY A CHARISMATIC LEADER WHO
4 USED HIS POWER TO ENRICH HIMSELF.
5 UNCONSCIONABLY. IN SOME OF THESE NEW WAVE
6 GROUPS, PEOPLE BEG FOR FINANCIAL CHARITIES.
7 PEOPLE SERVE AGAINST THEIR WILL. PEOPLE
8 ARE PREVENTED FROM COMMUNICATING WITH THEIR
9 FAMILIES. MAIL, BOTH INCOMING AND OUTGOING,
10 IS CENSORED. PRIVACY IS PREVENTED THROUGH A
11 BUDDY SYSTEM. YOUNG GIRLS ARE ENCOURAGED TO
12 BE HAPPY HOOKERS IN CHRIST, TO SEDUCE NEW
13 MEMBERS SEXUALLY."

14 DOCTOR, WHEN MEN AND WOMEN ARE USED IN THESE
15 WAYS, IS IT YOUR OPINION THAT THAT CONDUCT DESERVES ANYTHING
16 OTHER THAN A PEJORATIVE LABEL?

17 A NO. BUT --

18 Q AND SINCE THE MEDIA AND PRESS AND THE PUBLIC
19 AND MOST OF THE PEOPLE THAT WILL BE COMING IN CONTACT WITH
20 CALL THOSE GROUPS THAT ENGAGE IN THOSE KIND OF PRACTICES
21 CULTS, IS IT YOUR EXPERT OPINION THAT YOU WOULD NOT
22 CATEGORIZE THEM ALSO AS CULTS?

23 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT. IT
24 ASSUMES WHAT PEOPLE USE THE WORD "CULTS," WHAT THEY ARE
25 THINKING OF AND THAT IS SPECULATION. THERE IS NO TESTIMONY
26 OF THAT, YOUR HONOR.

27 THE COURT: HE CAN ANSWER.

28 THE WITNESS: I WOULD BE DELIGHTED TO ANSWER.

1921

1 BECAUSE YOU HAVE MADE A GENERALIZATION, MR.
2 LEVY, FROM ONE OR TWO PARTICULAR GROUPS. THERE ARE HORRIBLE
3 PEOPLE IN THIS WORLD AND I DON'T GENERALIZE. THERE ARE
4 HORRIBLE GROUPS IN THIS WORLD AND I DON'T GENERALIZE TO ALL
5 GROUPS. THE PROBLEM WITH THE WORD "CULT" -- THAT PARTICULAR
6 GROUP FOR WHICH MOST OF THOSE DESTRUCTIVE CHARACTERISTICS
7 WERE TAKEN FROM WERE CALLED CHILDREN OF GOD AT THE
8 PARTICULAR TIME OF THEIR EXISTENCE.

9 IF YOU ARE GOING TO USE THE WORD "CULT" FOR
10 THAT GROUP, THE FACT IS THE WORD "CULT" HAS BEEN USED FOR
11 ALMOST EVERY OTHER GROUP IN WHICH THERE ARE TRUE BELIEVERS.
12 SOME OF THE GROUPS TO WHICH YOU YOURSELF MIGHT FEEL VERY
13 LOFTY IDEALS AND WORTHY PURPOSES. THAT IS THE PROBLEM WITH
14 THE WORD "CULT."

15 Q BY MR. LEVY: THE ONLY ONE I BELIEVE HAS LOFTY
16 IDEALS IS THE AMERICAN BAR ASSOCIATION. OTHER THAN THAT,
17 WHO ELSE CAN YOU LOOK TO.

18 A I HAVE HEARD THINGS ABOUT THE AMERICAN BAR
19 ASSOCIATION.

20 Q EXCUSE ME, DOCTOR?

21 A I HAVE HEARD THINGS ABOUT THE AMERICAN BAR
22 ASSOCIATION.

23 Q I DON'T DOUBT THAT YOU HAVE.

24 THE COURT: HOW ABOUT THE AMERICAN MEDICAL
25 ASSOCIATION?

26 Q BY MR. LEVY: PRIOR TO TODAY, DOCTOR, YOU HAVE
27 NEVER MET GREGORY MULL, HAVE YOU?

28 A NO.

1922

1 Q YOU NEVER INTERVIEWED HIM PERSONALLY?

2 A NO, I DID NOT.

3 Q YOU NEVER SAW HIM BEFORE HE WAS HOSPITALIZED,
4 DID YOU?

5 A NO.

6 Q YOUR DECISIONS ABOUT HIM ARE BASED SOLELY UPON
7 WHAT YOU READ IN HIS DEPOSITIONS, THE LETTERS THAT WERE
8 WRITTEN BY HIM TO ELIZABETH CLARE PROPHET AND THE TESTIMONY
9 HERE AT THIS TRIAL; IS THAT CORRECT?

10 A RIGHT.

11 Q DO YOU HAVE ANY IDEA UNDER WHAT CIRCUMSTANCES
12 EACH OF THOSE LETTERS THAT MR. MULL WROTE WERE WRITTEN
13 UNDER?

14 A NO, I DO NOT.

15 Q DO YOU HAVE ANY IDEA AS TO WHAT HIS STATE OF
16 MIND WAS AT THE TIME OF THE WRITING OF ANY OF THOSE LETTERS?

17 A I CAN ONLY MAKE CONJECTURAL ASSUMPTIONS. ALL I
18 HAVE IS THAT TESTIMONY AND THOSE LETTERS.

19 Q SEMANTICALLY SPEAKING, IS THAT AN EDUCATED WAY
20 OF SAYING YOU COULD GUESS?

21 A YES -- NO. THERE IS A DIFFERENCE BETWEEN
22 GUESSING AND I THINK AN EDUCATED -- I THINK DR. SINGER
23 CALLED IT EDUCATED INTUITIVE ASSUMPTION.

24 Q DO YOU HAVE ANY EXPERTISE IN THE FIELD OF
25 THOUGHT REFORM?

26 A I WOULD NOT CALL IT EXPERTISE. I HAVE
27 FAMILIARITY WITH THE LITERATURE AND I KNOW WHAT IS BEING
28 DISCUSSED HERE. BUT I WOULD NOT CONSIDER MYSELF AN EXPERT

1923

1 ON THOUGHT REFORM.

2 Q WOULD YOU CONSIDER DR. ROBERT LIFTON AN EXPERT?

3 A YES.

4 Q WHAT ABOUT JOLLY WEST AT U.C.L.A.?

5 A I DON'T KNOW. I HAVE READ HIS ARTICLE. I
6 DON'T KNOW IF HE IS AN EXPERT. I DON'T KNOW WHAT EXPERIENCE
7 DR. WEST HAS HAD. AS MUCH AS I ADMIRE AND RESPECT HIM, I
8 DON'T KNOW THAT HE HAS HAD ANY EXPERIENCE WITH THOUGHT
9 REFORM.

10 Q HE HAS BEEN CALLED BY -- AN EXPERT BY THE
11 SUPERIOR COURT SYSTEM IN THE STATE OF CALIFORNIA
12 PARTICULARLY DURING THE PATTY HEARST TRIAL.

13 A I LIVED IN CALIFORNIA DURING THAT TRIAL. THAT
14 DOES NOT MAKE AN INDIVIDUAL AN EXPERT. I DON'T KNOW WHY HE
15 WAS CALLED AT THAT PARTICULAR TIME.

16 Q HAVE YOU READ HIS WRITINGS?

17 A I READ HIS MAJOR ARTICLE WITH DR. SINGER, YES,
18 I HAVE.

19 Q WOULD IT BE A FAIR STATEMENT TO SAY THAT AMONG
20 THOSE PEOPLE WHO ARE HELD TO BE EXPERTS IN THE FIELD OF
21 THOUGHT REFORM, JOLLY WEST FROM U.C.L.A., ROBERT LIFTON AND
22 MARGARET SINGER ARE GENERALLY CONSIDERED TO BE AMONG THE TOP
23 THREE IN THE COUNTRY?

24 A AS FAR AS I KNOW, MR. LEVY, ROBERT J. LIFTON IS
25 CONSIDERED TO BE AN EXPERT IN THOUGHT REFORM. I DO NOT KNOW
26 HONESTLY WHETHER DR. WEST AND DR. SINGER, AS ESTEEMED AS
27 THEY ARE, ARE EXPERTS ON THOUGHT REFORM.

28 Q WOULD IT SURPRISE YOU TO KNOW THAT IN DR.

1924

1 LIFTON'S BOOK, HE ACKNOWLEDGES THE ASSISTANCE AND THE HELP
2 OF DR. MARGARET T. SINGER AND HE ALSO MAKES A DEDICATION
3 WHICH SIMPLY SAYS THAT WITHOUT HER DECADES OF EXPERIENCE AND
4 HER INPUT INTO THE BOOK, THE BOOK COULD NOT HAVE BEEN
5 WRITTEN?

6 A I DID NOT KNOW THAT.

7 Q I THINK YOU MIGHT FIND IT IN THE DEDICATION
8 PAGE OF THE BOOK.

9 A THANK YOU.

10 Q NOW, IF SOMEONE WERE SEQUESTERED AT A CHURCH
11 SETTING OR LET'S CALL IT A SCHOOL SETTING, LIKE A SUMMIT
12 UNIVERSITY, WHILE THEY WERE THERE THEY WERE SUBJECTED TO THE
13 EXTENT THAT THEY COULD PARTICIPATE, SOME ISOLATION FROM
14 THEIR FAMILY AND THE OUTSIDE WORLD, SOME GROUP
15 SUGGESTIBILITY, CERTAIN DEGREE OF PEER GROUP PRESSURE, AND
16 THE GOOD FELLOWSHIP OR LOVE BOMBING THAT GOES ON IN NEW WAVE
17 RELIGIONS, THE REMOVAL OF THEIR PERSONAL PRIVACY, BEING
18 DORMITORIED OR QUARTERED IN BARRACKS TYPE SETTINGS, WHERE
19 THEIR DAYS ARE FULL FROM EARLY IN THE MORNING TO LATE AT
20 NIGHT LIKE DR. MOORE TOLD US HIS WERE WHEN HE WENT TO A
21 CONFERENCE, HE STARTED AT 5:00 IN THE MORNING AND HE ENDED
22 AT 11:00 OR LATER IN THE EVENING, IF THEY ARE SUBJECTED TO
23 SUBLIMINAL MESSAGES WHERE THERE IS A LIMITATION UPON
24 QUESTIONING BECAUSE THE USUAL RESPONSE IS, "EVENTUALLY WE
25 WILL GET TO THAT QUESTION, DON'T DISTURB THE GROUP AT THE
26 PRESENT TIME," IF THERE IS A CONFUSING DOCTRINE SUCH AS
27 SUGGESTED IN YOUR ARTICLE IN PSYCHOLOGY TODAY, IF THERE IS
28 THE SUGGESTION THAT THEY SHOULD REJECT THEIR OLD VALUES EVEN

1925

1 SEND LETTERS TO THEIR OLD MINISTER THAT THEY NOW REJECT
2 THEIR OLD RELIGION, IF THEY ARE SUBJECTED TO MANDATORY
3 CONFESSIONS, IF THERE IS A CERTAIN AMOUNT OF GUILT WITH
4 REGARD TO WHETHER OR NOT THEIR PAST LIVES ARE SUCH AS THEY
5 ARE GOING TO ALLOW THEM TO MAKE THEIR ASCENSION, IF THERE IS
6 A CERTAIN AMOUNT OF FEAR, FEAR OF NOT FOLLOWING A PARTICULAR
7 SPIRITUAL PATH, IF THEY ARE SUBJECTED TO HOURS AND HOURS OF
8 REPETITION DECREERING, IF IN THE COURSE OF WHAT THEY DO THEY
9 GET PLENTY OF GOOD OLD VEGETABLES, BUT WHAT THEY GET IS
10 CONTROLLED BY THE GROUP LEADER, IF THEY GET CONTROLLED
11 APPROVAL, IF THERE ARE DRESS CODES, IF THERE IS A FLAUNTING
12 OF THE HIERARCHY, IF THE PRECULT FAMILY IS DISTURBED OR
13 DESTROYED, IF THERE IS A FINANCIAL COMMITMENT THAT THEY ARE
14 OBLIGATED TO, IF THEY UNDERGO A PERIOD OF FASTING AND ENEMAS
15 AND COLONICS, IF THE AVERAGE PERSON WERE SUBJECTED TO THAT
16 OVER A THREE-MONTH PERIOD IN A SEQUESTERED SETTING, WOULD IT
17 BE YOUR PROFESSIONAL OPINION THAT THAT MIGHT PLAY AN
18 IMPORTANT PART IN A THOUGHT REFORM PROGRAM?

19 MR. KLEIN: YOUR HONOR, I WOULD OBJECT ON A NUMBER --

20 MR. LEVY: I IMAGINE YOU WOULD.

21 MR. KLEIN: -- ON A NUMBER OF GROUNDS. MANY OF THOSE
22 TERMS THAT HE USED WHICH IS VAGUE AND AMBIGUOUS WOULD BE A
23 DEGREE OF SOMETHING, A NUMBER OF THEM ARE BASED ON FACTS
24 THAT ARE NOT IN EVIDENCE IN THIS CASE. AND FINALLY, TO SAY
25 MIGHT THAT PLAY IS SIMPLY ASKING HIM TO SPECULATE. ON THOSE
26 GROUNDS, I WOULD OBJECT, YOUR HONOR.

27 THE COURT: WOULD YOU EXPECT IT TO PLAY?

28 WITH THAT, HE CAN ANSWER.

1 THE WITNESS: IF ALL THOSE THAT YOU LISTED, MR. LEVY,
2 ARE PRESENT FACTUALLY, AND THERE ARE NO OTHER REDEEMING
3 FEATURES, AND THE INDIVIDUAL HAS NO VOLITION ON HIS OWN, I
4 WOULD SAY IT WOULD AFFECT AND INFLUENCE THAT INDIVIDUAL.

5 Q BY MR. LEVY: NOW, IN YOUR ARTICLE AND IN YOUR
6 STATEMENTS, YOU'VE TALKED ABOUT PEOPLE JOIN GROUPS, NEW WAVE
7 GROUPS, AND GENERALLY WITHIN A YEAR OR TWO THEY FADE AWAY
8 AND THEY LEAVE; IS THAT RIGHT?

9 A THAT'S WHAT I -- YES.

10 Q WOULD THE EFFECT ON THE INDIVIDUALS BE
11 DIFFERENT IF THEY DIDN'T LEAVE OF THEIR OWN CHOICE BUT AFTER
12 THEY GAVE OF THEMSELVES TO THE EXTENT OF THEIR ABILITY AND
13 MONETARY RESOURCES, AND PROFESSIONAL ABILITIES AND THEN THEY
14 WERE ASKED TO LEAVE OR KICKED OUT, WOULD THE EFFECT ON THEM
15 BE DIFFERENT?

16 A YES. I FIND THE EFFECT DIFFERENT IN A NUMBER
17 OF CASES. ONE IS IF AN INDIVIDUAL IS EXTRUDED FROM A GROUP
18 OR IF AN INDIVIDUAL LEAVES BECAUSE OF SOME CONFLICT WITH THE
19 HIERARCHY AND IS ANGRY FOR WHATEVER REASON, OFTEN ABOUT
20 MONEY OR OTHER KINDS OF CONFLICT, OR AN INDIVIDUAL IS
21 KIDNAPPED AND DEPROGRAMMED, WHAT I OFTEN FIND IS THERE IS A
22 PASSIONATE VENDETTA DEVELOP AND THAT THE INDIVIDUAL OFTEN
23 BECOMES AN ANTI-CULT CULTIST, THAT THE SAME KIND OF
24 VEHEMENCE AND PASSION THAT WAS COMMITTED TO THE GROUP IS
25 THEN COMMITTED TO A CAMPAIGN AGAINST THE GROUP. I HAVE SEEN
26 THIS IN NUMEROUS ORGANIZATIONS AS A MATTER OF FACT THAT HAVE
27 A KIND OF VIGILANTE VIEW AT EVERY GROUP WITH A PRIORI
28 NEGATIVISM BUILT IN.

1927

1 Q THAT IS A NICE LECTURE BUT BACK TO THE
2 QUESTION.

3 THE QUESTION WAS, DOCTOR, WOULD THE EFFECT ON
4 AN INDIVIDUAL BE DIFFERENT IF HE JUST FADED AWAY THAN IF HE
5 HAD MADE A TOTAL COMMITMENT AND THEN WAS KICKED OUT?

6 A THE ANSWER WAS YES AND I MEANT BY THAT NICE
7 LECTURE THAT THERE WAS A PERPETUATION OF THE ANGER,
8 ANIMOSITY, RETRIBUTION AND EVEN FLASHBACKS HAVING TO DO WITH
9 THE GROUP BY VIRTUE OF THAT UNPLEASANT LEAVING.

10 Q NOW, LET'S ZERO THIS IN A LITTLE BIT TO GREGORY
11 MULL. MAY OF 1980, HE WAS ASKED TO LEAVE. HE WAS SUMMONED
12 BACK IN JUNE OF 1980, AND HE PARTED WITH THE LAST OF HIS
13 FUNDS, SOME \$5,500. THEREAFTER, HE SENT A LETTER TO THE
14 DEPARTMENT OF BUILDING AND SAFETY EXPRESSING HIS CONCERN
15 ABOUT SOME IMPROPERLY BUILT BUILDINGS.

16 DOES THAT SUGGEST TO YOU -- THAT LETTER BY THE
17 WAY WAS SENT TOWARD THE LATTER PART OF THAT YEAR, SO IN
18 ROUGHLY SIX MONTHS OR A YEAR DURING THE YEAR OF 1980 AFTER
19 THIS MAN WAS ASKED TO LEAVE, HE WROTE A LETTER TO THE
20 DEPARTMENT OF BUILDING AND SAFETY -- DOES THAT SUGGEST TO
21 YOU A GREAT DEGREE OF ANIMOSITY AND HATRED AND WHATEVER THE
22 OTHER TERMS WERE YOU USED TO DESCRIBE SOME OF THEM?

23 A THAT PARTICULAR LETTER?

24 Q YES.

25 A NOT NECESSARILY.

26 Q AND IF AFTER HE WAS THREATENED NOT TO DO OR SAY
27 ANYTHING ANYMORE, HE CEASED EVEN TALKING TO HIS FRIENDS ON
28 THE PROMISE THAT IF HE DID NOT TALK TO ANYONE OR DID NOT DO

1928

1 ANYTHING, HE WOULD NOT BE SUED, AND HE COMPLIED WITH THAT
2 ONLY TO BE SUED, WOULD YOU SUGGEST THAT THAT MIGHT HAVE A
3 REASON TO BE UPSETTING TO HIM PSYCHOLOGICALLY, DOCTOR?

4 A YES, IT'S POSSIBLE.

5 Q AND IF IN GOOD FAITH AND ETERNAL TRUST IN HIS
6 LEADER, HIS SPIRITUAL LEADER, HE WENT BY INVITATION TO A
7 SQUARE DANCE WHERE WHEN HE WAS ASKED WHAT HIS PURPOSE WAS TO
8 BE THERE, HE EXPRESSED THE DESIRE THAT HE MIGHT BE ABLE TO
9 SEE AND TALK WITH HER, AND HE WAS DENIED ADMITTANCE, DO YOU
10 THINK THAT MIGHT HAVE A PSYCHOLOGICAL INFLUENCE AND EFFECT
11 ON THAT INDIVIDUAL?

12 A WELL, THERE I WOULD JUST HAVE TO SAY I DON'T
13 KNOW BECAUSE I DON'T KNOW THE TOTAL CONTEXT OF THAT
14 SITUATION.

15 Q NOW, MR. KLEIN ASKED YOU WHETHER IT WAS PROPER
16 FOR A COUNSELOR TO MAKE AN EVALUATION IF THEY DID NOT HAVE
17 PRIOR KNOWLEDGE AS TO AN INDIVIDUAL'S PRIOR PSYCHOLOGICAL
18 MAKE-UP.

19 LET ME GIVE YOU A HYPOTHETICAL, IF I MAY.
20 LET'S SAY YOU WERE COUNSELING WITH SOMEONE WHO WAS SOMEWHAT
21 AMNESIAC. MAYBE PARTIALLY MUTE. MAYBE WHO TOLD YOU HE HAD
22 NO FAMILY OR FRIENDS. WOULD YOU BE ABLE TO MAKE AN
23 OBJECTIVE OPINION BASED ON YOUR PERSONAL OBSERVATIONS AND
24 YOUR DISCUSSIONS WITH THE INDIVIDUAL REGARDLESS OF HOW
25 LIMITED THOSE DISCUSSIONS WERE?

26 A I WOULD BE ABLE TO MAKE A LIMITED DIAGNOSIS.
27 IT WOULD TAKE ME LONGER, IT MIGHT NEED CORROBORATORY
28 EVIDENCE. I MIGHT WANT CONSULTATION FROM OTHER EXPERTS AND

1929

1 I MIGHT WANT OTHER KIND OF LAB TESTS TO SEE WHAT I SEE
2 CLINICALLY. ALL I AM SAYING IS THE MORE EVIDENCE WE HAVE
3 ABOUT AN INDIVIDUAL, JUST LIKE IN A CASE, THE MORE WE ARE ON
4 VALID AND RELIABLE GROUNDS.

5 TO THE EXTENT THAT WE DON'T HAVE THE
6 CORROBORATORY EVIDENCE, WE ARE IN THE REALM OF CONJECTURE.

7 Q IF THAT PERSON WAS TO BE YOUR CLIENT FOR SOME
8 TWO TO TWO-AND-A-HALF YEARS, DO YOU THINK IN THAT LENGTH OF
9 TIME, WITHOUT ANY FURTHER CORROBORATION, YOU MIGHT BEGIN TO
10 MAKE A DIAGNOSIS AS TO THAT INDIVIDUAL'S PSYCHOLOGICAL
11 PROBLEMS?

12 A YOU ARE TALKING ABOUT ME OR MAKING A STATEMENT
13 ABOUT WHO?

14 Q YOU, DOCTOR.

15 A THE ANSWER IS YES, I WOULD BE IN A MUCH BETTER
16 POSITION.

17 Q NOW, LET'S SAY AFTER THOSE TWO-AND-A-HALF YEARS
18 WHERE YOU ARE OBSERVING, TALKING TO, COUNSELING WITH AND
19 TREATING WITH THIS INDIVIDUAL, IF YOU OBSERVED A RADICAL
20 CHANGE, WOULD YOU STILL NEED PRIOR INFORMATION TO BE ABLE TO
21 NOTE AND DIAGNOSE THE RADICAL CHANGE?

22 A YES. YOU KNOW, AGAIN YOU ARE ASKING LOOSELY
23 ABOUT NEED. I WOULD WANT. FOR EXAMPLE, THERE ARE MANY
24 INSTANCES WHERE AN INDIVIDUAL DECOMPENSATES, THAT IS HAS A
25 PSYCHOTIC BREAK. I AM NOT REFERRING TO MR. MULL AT ALL.

26 AT SOME POINT I AM THINKING OF ONE PARTICULAR
27 INDIVIDUAL IN HER LATE THIRTIES, WITHOUT KNOWING THAT THAT
28 INDIVIDUAL HAD A SIMILAR BREAKDOWN ABOUT 15 YEARS EARLIER

1930

1 AND NOTHING IN BETWEEN, DETERMINED HOW A DIAGNOSIS WAS MADE.

2 THAT IS, THE CORROBORATORY EVIDENCE WAS VERY
3 IMPORTANT IN DETERMINING HOW ONE LOOKED AT THAT PARTICULAR
4 INDIVIDUAL BOTH IN TERMS OF DIAGNOSIS, TREATMENT AND
5 PROGNOSIS.

6 SO TO THE EXTENT THAT WE HAVE THE INFORMATION,
7 WE ARE MUCH BETTER OFF AS IS THE PATIENT OR CLIENT. TO THE
8 EXTENT THAT WE DON'T HAVE, WE HAVE TO USE WHAT WE HAVE,
9 WHICH IS LIMITED.

10 Q DOCTOR, YOU JUST USED THE TERM --

11 THE COURT: DO YOU WANT TO FINISH YOUR QUESTION?

12 Q BY MR. LEVY: YOU'VE JUST USED THE TERM
13 PSYCHOTIC BREAK?

14 A YEAH.

15 Q IF SOMEONE BELIEVED TOTALLY AND COMPLETELY IN
16 AN INDIVIDUAL AS THEIR SPIRITUAL LEADER AND ACCEPTED TOTALLY
17 AND COMPLETELY THE RELIGIOUS TEACHINGS OF AN ORGANIZATION,
18 SO MUCH SO THAT WHEN THAT SPIRITUAL LEADER LABELED THEM IN
19 THIS CASE BEAST OF BLASPHEMY, AND SHORTLY THEREAFTER THAT
20 PERSON WAS HOSPITALIZED WITH A STROKE-LIKE INCIDENT THAT WAS
21 PRECIPITATED BY THAT LABELING, WOULD IT BE A FAIR STATEMENT
22 TO SAY THEN THAT THE COURSE OF CONDUCT OF THE LABELING BY
23 THE SPIRITUAL LEADER MAY HAVE PLAYED A CONSIDERABLE PART IN
24 PRECIPITATING THE PSYCHOLOGICAL BREAK THAT LED TO THE
25 HOSPITALIZATION?

26 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. THAT
27 QUESTION CONTRADICTS THE TESTIMONY OF HIS OWN WITNESS, DR.
28 AFSHAR, WHO SAID YOU COULDN'T TELL WHETHER ANYTHING WAS

1 THAT --

2 MR. LEVY: IS THIS YOUR FINAL ARGUMENT?

3 THE COURT: WHAT IS THE OBJECTION?

4 MR. KLEIN: IT IS NOT BASED ON THE EVIDENCE, YOUR
5 HONOR.

6 MR. LEVY: IT IS A HYPOTHETICAL QUESTION FOR YOUR
7 WITNESS.

8 MR. KLEIN: HYPOTHETICAL QUESTIONS HAVE TO BE BASED
9 ON EVIDENCE IN THE CASE, YOUR HONOR.

10 I WOULD OBJECT.

11 THE COURT: I WOULD URGE THAT YOU THINK ABOUT THE
12 QUESTION. I SUGGEST THAT YOU JUST MISUNDERSTOOD, WHICH CAN
13 HAPPEN TO ANY OF US, MR. KLEIN, AND I SUGGEST THAT IS WHAT
14 HAS HAPPENED TO YOU NOW. THE QUESTION ASKED THIS WITNESS'
15 OPINION AS TO WHETHER HE THINKS THERE MIGHT BE A CAUSATIVE
16 LINK. HE MIGHT HAVE AN OPINION AND HIS OPINION MIGHT AGREE
17 OR DISAGREE WITH THE OPINION OF SOME OTHER WITNESS.

18 NOW HE IS GOING TO ANSWER.

19 THE WITNESS: YOU USED THE WORD EMOTIONAL BREAKDOWN
20 OR PSYCHOLOGICAL BREAKDOWN. I WAS NOT AWARE THAT --

21 Q BY MR. LEVY: I DIDN'T SAY BREAKDOWN. I USED
22 YOUR TERM, DOCTOR, PSYCHOTIC BREAK.

23 A I WAS NOT AWARE AT ALL THAT MR. MULL HAD A
24 PSYCHOTIC BREAK. WHAT I WAS INFORMED I THINK FROM THE
25 TESTIMONY AND FROM THE DEPOSITION IS THAT MR. MULL WAS
26 HOSPITALIZED BECAUSE OF A CARDIOVASCULAR ACCIDENT, C.V.A.,
27 ALSO KNOWN AS A STROKE. I AM NOT AN EXPERT ON
28 CARDIOVASCULAR DISEASE BUT -- I AM NOT A NEUROLOGIST, BUT IT

1 WOULD BE THE FIRST TIME THAT I WOULD HAVE HEARD A STROKE
2 PRECIPITATED BY SOMEBODY CALLING SOMEBODY A BAD NAME.

3 Q ARE YOU TELLING THIS COURT IF THERE IS A
4 TRAUMATIC EVENT IN SOMEONE'S LIFE PREDICATED ON A WAY OF
5 LIFE THEY HAVE COME TO ACCEPT AND BELIEVE IN, IF THERE IS A
6 TRAUMATIC EVENT THAT IS SIGNIFICANT ENOUGH TO PUT THAT
7 PERSON IN A STATE OF FEAR AND A STATE OF STRESS, THAT THE
8 STRESS AND THE FEAR AND THE ENTIRETY OF THE SITUATION CANNOT
9 BE A CONTRIBUTING FACTOR TO THAT STROKE-LIKE INCIDENT?

10 A I DO NOT PURPORT TO BE A LAWYER ANY MORE THAN
11 YOU PURPORT TO BE A PSYCHIATRIST.

12 Q I APPRECIATE THAT.
13 YOU WANT TO ANSWER THE QUESTION, PLEASE?

14 A YES. I JUST RESENTED YOUR INSINUATION.

15 Q THEN I APOLOGIZE FOR MY INSINUATION.

16 A THERE MAY BE ABSOLUTELY NO INFLUENCE
17 WHATSOEVER. WE JUST DON'T KNOW. IN THIS PARTICULAR -- YOU
18 DON'T KNOW IN ANY PARTICULAR ONE SITUATION.

19 Q GENERALLY SPEAKING, DOCTOR, DOES STRESS PLAY
20 ANY PART --

21 A GENERALLY SPEAKING, STRESS CAN PLAY SOME PART
22 IN THE EVOLUTION OF ALMOST ANY KIND OF PHYSICAL DISORDER.

23 THE COURT: INCLUDING A CARDIOVASCULAR INCIDENT?

24 THE WITNESS: IT CAN BE RELATED MORE TO BLOOD
25 PRESSURE AND PULSE RATE RATHER THAN CARDIO --

26 THE COURT: INCLUDING A STROKE-LIKE INCIDENT?

27 THE WITNESS: I WOULD SAY ONLY AS A RESULT OF A GREAT
28 INCREASE IN BLOOD PRESSURE, A GREAT INCREASE IN PULSE RATE.

1 THE COURT: WHICH MIGHT OCCUR AS A PRODUCT OF STRESS?

2 THE WITNESS: MR. JUSTICE, I JUST DON'T KNOW WHETHER
3 IT CAN OCCUR TO THE EXTENT THAT IT WOULD PRECIPITATE A
4 CARDIOVASCULAR ACCIDENT. I DON'T KNOW. I WOULD WANT TO
5 MAKE A STATEMENT TO THAT EFFECT WITH A GREAT DEAL OF MEDICAL
6 CONFIDENCE AND I AM NOT GOING TO COMMIT MYSELF WHEN I AM NOT
7 AN EXPERT IN THAT AREA.

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

9 (AT 12:05 P.M., A RECESS WAS TAKEN UNTIL
10 1:30 P.M. OF THE SAME DAY.)
11
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1 LOS ANGELES, CALIFORNIA; MONDAY, MARCH 10, 1986

2 1:35 P.M.

3 DEPARTMENT NO. 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS NOTED ON TITLE PAGE.)

5
6 SAUL LEVINE,

7 RESUMED THE STAND AND TESTIFIED FURTHER AS FOLLOWS:

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

11 THE WITNESS: SAUL LEVINE.

12 THE CLERK: THANK YOU.

13 THE COURT: PLEASE PROCEED.

14 MR. LEVY: THANK YOU, YOUR HONOR.

15
16 CROSS-EXAMINATION (RESUMED)

17 BY MR. LEVY:

18 Q DR. LEVINE, LET ME START BY APOLOGIZING TO YOU
19 IF I APPEARED TO BE RUDE TO YOU BEFORE. SOMETIMES IN MY
20 INTENSITY, I GET A LITTLE BIT CARRIED AWAY. AND SINCE WE
21 BOTH AGREE THAT OF ALL THE ORDERS THAT WE CAN BELONG TO AND
22 FOLLOW, THE A.B.A. AND THE A.M.A. ARE AMONG THE TWO
23 GREATEST, SINCE WE ARE IN ACCORD ON THAT, MY HUMBLE APOLOGY
24 TO YOU.

25 A I APPRECIATE YOUR COMMENTS.

26 Q IN THE COURSE OF YOUR PRACTICE AS A
27 PSYCHIATRIST, HAVE YOU COME IN CONTACT WITH PEOPLE WHO HAVE
28 SUFFERED STRESS?

1935

1 A YES.

2 Q HAVE YOU EVER COUNSELED WITH SOMEONE WHO, AS A
3 RESULT OF THE STRESS, HAD BEEN DISABLED?

4 A YES.

5 Q IF A PERSON HAD A TOTAL COMMITMENT, AN ABIDING
6 BELIEF IN THE SPIRITUAL LEADER, SO MUCH SO THAT THAT
7 INDIVIDUAL HAD FOLLOWED THE PRECEPTS OF THAT SPIRITUAL
8 LEADER TO THE DEGREE THAT THEY DID NOT BALK WHEN A MARITAL
9 RELATIONSHIP WAS TERMINATED, AND THEY DID NOT BALK WHEN IT
10 MEANT THE END OF THEIR EXISTING PROFESSIONAL CAREER, IF
11 SOMEONE HAD THAT KIND OF FAITH AND ALLEGIANCE TO SOMEONE,
12 AND THAT SOMEONE BEING THEIR SPIRITUAL LEADER KICKED THEM
13 OUT OF THE CHURCH, COULD THAT CAUSE A SEVERE TRAUMATIC
14 EPISODE OF THAT INDIVIDUAL WHO WAS SO KICKED OUT OF THE
15 CHURCH?

16 A IT COULD CAUSE SEVERE STRESS, YES.

17 Q NOW, WHEN I USE THE TERM BEAST OF BLASPHEMY AND
18 SERPENT BEFORE, I BELIEVE YOUR ANSWER WAS THAT ANY DIRTY
19 WORD COULD CREATE A STRESSFUL SITUATION. WHEN I REFERRED TO
20 THOSE TERMS, HYPOTHETICALLY I WOULD LIKE YOU TO ADDRESS
21 YOURSELF TO AN INDIVIDUAL WHO HAS ACCEPTED THE TOTALITY OF A
22 RELIGIOUS BELIEF, A NEW WAVE, IF YOU WILL, RELIGIOUS BELIEF.
23 AND HAS ACCEPTED THE TOTALITY OF THE TEACHINGS OF THAT
24 BELIEF TO SUCH A DEGREE THAT SOME THREE-AND-A-HALF, FOUR
25 YEARS LATER, AFTER HE HAS BEEN KICKED OUT OF THE CHURCH,
26 THAT IT CAUSES SUFFICIENT STRESS SO THAT THAT STRESS MAY BE
27 ONE OF THE PRECIPITATING FACTORS IN A STROKE, WOULD YOU SAY
28 HIS DEDICATION TO THE CAUSE WAS COMPLETE?

1936

1 A YES.

2 Q IF SOMEONE WERE THE SPIRITUAL LEADER AND KNEW
3 AND UNDERSTOOD THAT DEGREE OF COMMITMENT, HOW WOULD YOU
4 CHARACTERIZE THE SPIRITUAL LEADER KNOWING OF THE
5 VULNERABILITY OF THE INDIVIDUAL IF THEY NEVERTHELESS LABEL
6 THEM THE BEAST OF BLASPHEMY AND THE SERPENT?

7 A WELL, I DON'T KNOW IF I WOULD BE COMPLIMENTARY.
8 I DON'T KNOW HOW I WOULD LABEL THEM. BUT OBVIOUSLY THE WAY
9 YOU ARE DESCRIBING, YOU ARE SETTING UP THE SITUATION FOR ME
10 TO RESPOND TO, AND GIVEN THAT, AS I SAID BEFORE THE
11 PARAMETERS OF WHAT YOU ARE ASKING, I WOULD HAVE TO SAY I
12 WOULD BE CRITICAL OF SOMEBODY WHO HAD THAT KIND OF
13 TREMENDOUS POSITIVE IMAGE AND THEN UTILIZED THAT POSITION
14 CRITICALLY.

15 BUT -- THAT'S MY ANSWER TO YOUR HYPOTHETICAL
16 QUESTION.

17 Q NOW, DOCTOR, IN YOUR PROFESSIONAL CAPACITY,
18 WHEN YOU ARE COUNSELING WITH SOMEONE, SO THAT I UNDERSTAND
19 WHAT YOU TOLD US BEFORE, YOU SAID NATURALLY IT IS BEST TO
20 GET AS MUCH INFORMATION WHEN YOU ARE WORKING WITH A PATIENT
21 OR A CLIENT AS YOU CAN POSSIBLY GET. AND I UNDERSTAND AND I
22 AGREE WITH THAT. IN THE COURSE OF YOUR PRACTICE, IS IT
23 SOMETIME THE CASE THAT YOU DO NOT HAVE THE OPPORTUNITY, THE
24 AVAILABILITY OR THE -- WHATEVER IT TAKES TO GET ALL OF THE
25 INFORMATION THAT YOU CAN POSSIBLY GET?

26 A YES.

27 Q WOULD YOU SAY THAT'S MORE GENERALLY THE CASE
28 THAN OTHERWISE?

1938

1 UNETHICAL BUT I COULDN'T SAY BEYOND THAT. THE PART ABOUT
2 THE RELIGIOUS LEADER BEING PRIVY TO THAT INFORMATION, I
3 DON'T KNOW WHAT CODE THAT RELIGIOUS LEADER IS BREAKING
4 AGAIN, IN YOUR HYPOTHETICAL QUESTION.

5 Q BY MR. LEVY: WELL, LET ME PUT IT TO YOU THIS
6 WAY. IF IN THE COURSE OF THE DIALOGUE BETWEEN THE TWO
7 PARTIES, INFORMATION WAS CONTAINED IN A PRIEST-PENITENT
8 COMMUNICATION WAS DISSEMINATED BACK AND FORTH, IN YOUR
9 OPINION WOULD THEN THE SPIRITUAL LEADER ALSO BE BREAKING
10 THAT FIDUCIARY RELATIONSHIP?

11 A REVEALING THAT INFORMATION TO OTHER PEOPLE YOU
12 MEAN?

13 Q YES.

14 A MY PERSONAL OPINION WOULD BE IT WOULD BE
15 BREAKING SOME FORM OF TRUST, DEEP TRUST.

16 Q NOW, MR. KLEIN STARTED TO ASK YOU A QUESTION
17 AND THEN HE CHANGED THE QUESTION. BUT THE QUESTION HAD TO
18 DO WITH MARGARET SINGER AND THE QUESTION HAD TO DO WITH --
19 EXCUSE ME. DR. MARGARET T. SINGER. I DON'T WANT TO APPEAR
20 FAMILIAR JUST LIKE I APOLOGIZED TO YOU. I WANT TO GIVE HER
21 HER FULL PROFESSIONAL TITLE. THE QUESTION WENT TO THAT AREA
22 ON WHICH SHE BASED SOME OF HER CONCLUSIONS. AND YOU HEARD
23 THE DIALOGUE BETWEEN THE COURT AND MR. KLEIN AND MYSELF. I
24 WANT TO READ TO YOU A PORTION -- A FURTHER PORTION OF HER
25 TESTIMONY IN RESPONSE TO A QUESTION HERE IN THIS COURT. AND
26 I WANT TO KNOW AFTER I READ THAT TO YOU, IF IN YOUR
27 OPINION -- LET ME HOLD THE QUESTION UNTIL I READ IT TO YOU.

28 "QUESTION, NOW EVEN THOUGH --"

1 THE COURT: PLEASE IDENTIFY WHERE YOU ARE READING.

2 MR. LEVY: EXCUSE ME, YOUR HONOR. THIS IS FROM A
3 TRANSCRIPT OF THIS TRIAL. I AM READING THE TESTIMONY FROM
4 WEDNESDAY, FEBRUARY THE 26, 1986, ON PAGE 557, STARTING AT
5 LINE FOUR, AND GOING TO 558, LINE 10. STARTS WITH THE
6 QUESTION,

7 "NOW, EVEN THOUGH THAT IS
8 SEVERAL PAGES LONG, I THINK IT IS ALL
9 PERTINENT. WOULD YOU BE KIND ENOUGH TO
10 READ TO THE COURT WHAT IT IS YOU DID IN
11 PREPARATION FOR YOUR TESTIMONY AT THIS
12 TRIAL?

13 "A I BEGAN BY READING -- WELL, I
14 BEGAN BY LISTING THE READINGS. AND I'VE
15 LISTED THE DEPOSITIONS THAT I READ. I'VE
16 READ SIX VOLUMES OF MR. GREGORY MULL'S
17 DEPOSITION, I READ THE DEPOSITION OF
18 KATHLEEN LEVY, TWO VOLUMES OF ELIZABETH
19 CLARE FRANCIS' DEPOSITION, THE DEPOSITION
20 OF MR. RANDALL KING, THAT OF DR. AFSHAR. I
21 READ THE AMENDED CROSS-COMPLAINT AND THE
22 DEFENDANT'S TRIAL BRIEF.

23 "THEN I READ A SERIES OF
24 DOCUMENTS WRITTEN BY GREGORY MULL, MARILYN
25 MALEK, MR. AND MRS. BEN MAR, SUSAN
26 PIETRANGELO, A TEN-YEAR MEMBER OF THE
27 CHURCH UNIVERSAL AND TRIUMPHANT, A DOCUMENT
28 WRITTEN BY JOHN PIETRANGELO, WHO WAS A

1940

1 THIRTEEN-YEAR MEMBER, ONE BY SANDRA NILES,
2 WHO WAS IN SEVEN YEARS, ONE BY DONALD
3 TROWBRIDGE, WHO WAS A TWELVE-YEAR MEMBER,
4 ONE BY SUSAN MULDNAUR, ONE BY CYNTHIA
5 SCHWARTZ, ONE BY MAE GADPAILLE AND ONE BY
6 KATHLEEN MUELLER.

7 "I READ THE TRANSCRIPTS OF
8 INTERVIEWS DONE OVER THE TELEPHONE WITH ANN
9 TROWBRIDGE, DONALD TROWBRIDGE, DAVID AND
10 RACHEL MURPHY, CHARLES AND CHERYL NILES,
11 LUIS LEYVA, JOSEPH SZIMHART, STEVEN PAVUK
12 AND I INTERVIEWED MR. RANDALL KING OVER THE
13 PHONE.

14 "IN PERSON I INTERVIEWED MR.
15 GREGORY MULL IN 1982, AGAIN IN 1983 AND IN
16 1985 FOR APPROXIMATELY TEN HOURS. I
17 INTERVIEWED ANN TROWBRIDGE IN 1985 FOR FIVE
18 HOURS. AND IN '85 AND '86 I INTERVIEWED MR.
19 DONALD TROWBRIDGE FOR A TOTAL OF EIGHT HOURS.
20 I INTERVIEWED MRS. PAT BROWN IN 1986 FOR
21 THREE HOURS. AND IN 1985 I INTERVIEWED MR.
22 WILLIAM PURCELL FOR ELEVEN HOURS.

23 "AND PRIOR TO THIS, I HAVE OVER
24 THE YEARS HAD EIGHT CLIENTS, WHOSE NAMES I
25 CAN'T CITE WHO WERE FORMER MEMBERS OF THE
26 CHURCH, WHO CAME TO ME AFTER THEY HAD LEFT
27 THE GROUP FOR COUNSELING.

28 "THEN I STUDIED OTHER DOCUMENTS

1941

1 THAT WERE PROVIDED TO ME. AND DID YOU WANT
2 ME TO READ THOSE?"

3 THAT IS WHERE THE TESTIMONY STOPS.

4 NOW, IN YOUR PROFESSIONAL OPINION, DO YOU THINK
5 THAT WITNESS DID A REASONABLE JOB IN ASCERTAINING ALL THE
6 INFORMATION THAT THAT PERSON WAS ABLE TO GET IN ORDER TO
7 FORM THEIR QUALIFIED PROFESSIONAL OPINION?

8 A MR. LEVY, I HAVE A LOT OF RESPECT FOR DR.
9 SINGER. I AM SURE THAT SHE DID ALL THESE INTERVIEWS AND I
10 AM SURE THAT SHE WAS TRYING TO GET AS MUCH INFORMATION ABOUT
11 WHATEVER WE ARE DISCUSSING TODAY. I FRANKLY DON'T KNOW
12 WHICH, IF ANY OF THOSE PEOPLE, COULD CORROBORATE OR GIVE ANY
13 TESTIMONY OR EVIDENCE TO HER ABOUT MR. MULL'S PAST. I JUST
14 DON'T KNOW.

15 IF YOU ARE SAYING THAT ALL OF THESE PEOPLE
16 COULD AND DID IN FACT PROVIDE HER WITH THAT KIND OF
17 HISTORICAL BACKGROUND, THEN THE ANSWER IS YES. BUT I JUST
18 DON'T KNOW. I DON'T KNOW WHO THESE PEOPLE ARE, FRANKLY.

19 Q WELL, LET'S START WITH TWO THINGS. FIRST OF
20 ALL, IF THAT KIND OF PREPARATION WAS DONE, IN YOUR
21 PROFESSIONAL OPINION, WOULD IT HAVE BEEN REASONABLE AND
22 PROFESSIONAL TO HAVE DONE INVESTIGATION TO THAT EXTENT?

23 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
24 AMBIGUOUS, YOUR HONOR.

25 THE COURT: PLEASE REPHRASE THE QUESTION.

26 Q BY MR. LEVY: LET ME STATE IT THIS WAY. IF
27 THAT'S WHAT A PROFESSIONAL DID IN ORDER TO UNDERSTAND A
28 PERSON AND THE GROUP THAT THEY WERE TESTIFYING ABOUT, IN

1942

1 YOUR PROFESSIONAL OPINION WOULD WORK TO THAT EXTENT HAVE
2 DISPLAYED PROFESSIONAL CAPACITY?

3 A IF YOU ARE ASKING ME -- SORRY, I AM NOT BEING
4 CUTE, MR. LEVY. IF YOU ARE ASKING ME WHETHER THAT IS
5 SUFFICIENT TO DRAW A CONCLUSION AS TO A SAMPLE OF PEOPLE, I
6 WOULD HAVE TO KNOW WHAT KIND OF PEOPLE THEY WERE.

7 TO MAKE A REASONABLE ASSESSMENT ABOUT A GROUP,
8 YOU HAVE TO GET -- EXPERIENCE INTERVIEWS WITH PEOPLE BOTH IN
9 AND OUTSIDE, BOTH PRO AND BOTH CON THEN YOU CAN MAKE THAT
10 JUDGMENT. IF YOU ARE ASKING ME SPECIFICALLY ABOUT MR. MULL,
11 AGAIN, I DON'T KNOW WHETHER THESE PEOPLE COULD FILL HER IN.

12 I AM SURE THAT SHE DID HER HOMEWORK.

13 Q THAT IS OFF TO ONE SIDE OF MY QUESTION. YOU
14 TESTIFIED BEFORE THAT YOU HAVE NOT ATTENDED ANY OF THE
15 FUNCTIONS OF THIS CHURCH, YOU HAVE NOT GONE TO AND COUNSELED
16 WITH ANY OF THEIR MEMBERS CURRENT OR EX-MEMBERS, THAT ALL
17 YOU DID WAS READ GREGORY MULL'S TESTIMONY AND HIS
18 DEPOSITIONS AND SOME LETTERS. AND YOU, ON THE BASIS OF
19 THAT, FELT QUALIFIED TO GIVE YOUR OPINION WITH REGARD TO MR.
20 MULL AND HIS RELATIONSHIP WITH THIS ORGANIZATION?

21 A I -- THE NATURE OF THE QUESTIONS THAT ARE
22 DIRECTED TO ME ARE IN GENERAL BASED ON MY RESEARCH, NOT ON
23 THIS PARTICULAR -- I DO NOT HAVE FAMILIARITY WITH THE GROUP
24 OR WITH MR. MULL.

25 Q NOW, THERE WAS A DR. MOORE HERE WHO TESTIFIED
26 YESTERDAY OR LAST WEEK AND HE TOLD US ABOUT ONE OF THE
27 GROUPS THAT HE -- A NEW WAVE RELIGION, THE CHILDREN OF GOD,
28 WHO HE FELT WAS JUST ANOTHER ONE OF THE NEW WAVE RELIGIONS.

1943

1 YOU HAVE TOLD US TODAY YOU HAVE FOUND SOME OF
2 THEIR CONDUCT TO BE LESS THAN EQUITABLE AND PROPER. WOULD I
3 BE CORRECT IN ASSUMING THEN THAT YOU ARE AT ODDS WITH DR.
4 MOORE? AT LEAST WITH REGARD TO YOUR OPINION OF THE CHILDREN
5 OF GOD?

6 A NO, NOT NECESSARILY.

7 MY WORK -- MY RESEARCH ABOUT THE CHILDREN OF
8 GOD OCCURRED TEN YEARS AGO. I AM NOT UP TO DATE ON WHAT
9 THEY ARE RIGHT NOW. FURTHERMORE, AS I WAS JUST COMMENTING,
10 THE -- EVEN WHEN YOU HAVE A GROUP THAT MISREPRESENTS ITSELF
11 AND DOES SOME NEFARIOUS THINGS, WHICH THE LEADER OF THE
12 CHILDREN OF GOD DID IN FACT INCUR AT THAT TIME, ESPECIALLY
13 IN THE EARLY SEVENTIES, INDIVIDUAL SECTS OR BRANCHES OR
14 TEMPLES OF THAT PARTICULAR RELIGION MAY BE TOTALLY DIVORCED
15 AND MIGHT IN FACT REPRESENT A WHOLE GROUP OF WHOLESOME
16 COMMITTED SOCIALLY CONSTRUCTIVE INDIVIDUALS.

17 I HAVE SEEN THIS TOO WITHIN THAT PARTICULAR
18 RELIGION, THE CHILDREN OF GOD.

19 WAS THAT CLEAR?

20 Q YES, THAT WAS CLEAR.

21 WAS IT THE CHILDREN OF GOD WHO SENT THE YOUNG
22 LADIES OUT TO BE HOOKERS FOR CHRIST?

23 A YES.

24 Q AND THAT IS WHOLESOME?

25 A NO, I DIDN'T SAY THAT WAS WHOLESOME AT ALL. I
26 THINK THAT IS TERRIBLE.

27 Q ISN'T THAT PART OF THE TOTALITY OF THE
28 ORGANIZATION?

1944

1 A NO. WHAT I SAID WAS THAT I HAVE MET PEOPLE WHO
2 ARE MEMBERS OF THE CHILDREN OF GOD, A BRANCH OF THAT
3 RELIGION, WHO HAD NOTHING TO DO WITH THAT KIND OF TEACHING.
4 IF YOU ARE ASKING ME IF THEY ARE TERRIBLE INDIVIDUALS WHO
5 ARE LEADERS OF THE GROUP, ABSOLUTELY YES. FROM MY BOTH
6 RECOLLECTION AND STUDIES, THE REVEREND BERG, UNCLE MO AS HE
7 WAS CALLED, WAS ONE OF THOSE INDIVIDUALS.

8 Q NOW, YOU HAVE MADE SOME ANALOGIES AND YOU MADE
9 ONE BETWEEN A YESHIVOT.

10 WHAT DOES YESHIVOT MEAN BY THE WAY?

11 A YESHIVOT IN HEBREW, IF THAT IS WHAT YOU ARE
12 ASKING ME, IS TO SIT.

13 YESHIVOT IS A JEWISH ORTHODOX SEMINARY WHERE
14 YOUNG MEN AND WOMEN OR PEOPLE OF ALL AGES STUDY THE TORAH.

15 Q IS THAT LIKE A SCHOOL?

16 A YES, SEMINARY, YES. THEOLOGICAL SCHOOL.

17 Q WHEN THE PEOPLE STUDY AND THEY SIT THERE AT THE
18 END OF THE TIME THE COURSE OF THEIR STUDIES, DO THEY NOT GO
19 ON THEN IN THE COURSE OF THEIR LIFE TO MAYBE BECOME RABBIS
20 OR TEACHERS OR GO BACK INTO THEIR COMMUNITY?

21 A MR. LEVY, THE FIVE YESHIVOTS THAT I LOOKED AT
22 IN ISRAEL WERE CERTAINLY A TRAINING GROUND FOR SOME PEOPLE.
23 BUT I MUST TELL YOU THESE WERE INDIVIDUAL -- THESE WERE SET
24 UP SPECIFICALLY TO ATTRACT JEWISH PEOPLE WHO HAD LOST THEIR
25 FAITH, SO TO SPEAK, WHO WERE NOT THERE TO SEEK OUT RELIGION.
26 THEIR PURPOSE WAS SET UP TO ATTRACT THESE INDIVIDUALS AND
27 TO, I WILL USE THE WORD SEDUCE THEM BACK INTO RELIGION. NOT
28 THEM BACK BUT THEIR FAMILIES BACK.

1945

1 IF ONE OF THEM BECAME RABBIS, THEN THEY WOULD
2 BE VERY SUCCESSFUL OBVIOUSLY IN THEIR QUEST. BUT THE FACT
3 IS THE PARENTS WERE VERY CONCERNED BECAUSE THESE WERE YOUNG
4 PEOPLE WHO WERE GOING ON TO SCHOOLS AND COLLEGES AND JOBS,
5 WHATEVER, AND SUDDENLY GAVE ALL OF THAT UP TO JOIN A VERY
6 INTENSE DEDICATED FUNDAMENTALIST RELIGIOUS PURSUIT. THEY
7 WERE AS CONCERNED IN MY RESEARCH AS INDIVIDUALS WHOSE SAME
8 KIDS FROM THE SAME ETHNIC BACKGROUND JOINED OTHER GROUPS
9 THAT ARE CONSIDERED TO BE CULTS IN SOCIETY.

10 I DO NOT CALL YESHIVOTS CULTS. I AM JUST
11 TELLING YOU THERE ARE STRONG SIMILARITIES BETWEEN A LOT OF
12 FUNDAMENTALIST SECTS AND RELIGIONS.

13 Q WOULD YOU EQUATE THE INDOCTRINATION ONE GETS
14 WHEN YOU GO THROUGH BOOT CAMP AS THE SAME AS THE
15 INDOCTRINATION ONE GETS WHEN THEY JOIN ONE OF THE NEW WAVE
16 ORGANIZATIONS?

17 A EVEN WHEN YOU SAY -- I HAVE NEVER BEEN TO BOOT
18 CAMP. FROM WHAT I KNOW OF BOOT CAMP, THERE ARE SOME
19 SIMILARITIES.

20 BUT EVEN WHEN YOU SAY NEW WAVE RELIGIONS, THERE
21 ARE A WHOLE GAMUT OF RELIGIOUS TEACHINGS AND GROUPS, SOME
22 MORE INFLUENTIAL AND DEDICATED AND INTRUSIVE THAN OTHERS.

23 IF YOU ARE MAKING A GENERALIZATION, I WOULD SAY
24 MOST ARE RATHER INNOCUOUS FROM THAT PERSPECTIVE.

25 Q IN THE COURSE OF YOUR STUDIES, HAVE YOU
26 CONCLUDED WHICH ONES -- LET ME STRIKE THAT.

27 HAVE YOU COME ACROSS SOME THAT YOU DID NOT FEEL
28 WERE INNOCUOUS?

1946

1 A YES. I MENTIONED THE CHILDREN OF GOD FOR
2 EXAMPLE. BUT EVEN THEN I AM VERY CAREFUL BEFORE I DRAW
3 CONCLUSIONS TO LOOK AT THE INDIVIDUAL AND THE INDIVIDUAL
4 SECT OF THAT GROUP AND THEN THE GENERAL TEACHINGS BEFORE I
5 KNOW WHETHER AN INDIVIDUAL HIMSELF OR HERSELF HAS BEEN
6 HARMED OR IS IN A DETRIMENTAL UNIT OF PEOPLE.

7 Q WOULD IT BE A FAIR STATEMENT TO SAY THAT PEOPLE
8 ON THE OUTER FRINGES OF A GROUP EVEN LIKE THE CHILDREN OF
9 GOD, SAY THEY WERE AT THEIR VERY OUTSIDE FRINGE, IN YOUR
10 OPINION ARE THEY OFTTIMES NOT INFORMED ABOUT WHAT GOES ON IN
11 THE INNER CIRCLES?

12 A THEY MIGHT NOT BE. IT'S POSSIBLE.

13 Q IS IT YOUR OPINION AND CONCLUSION OF YOUR STUDY
14 THAT IN ORGANIZATIONS, THERE ARE SEVERAL LAYERS OF
15 COMMITMENT?

16 A YES. DEFINITELY THERE IS A HIERARCHY IN ALMOST
17 ALL OF THESE AND THERE IS USUALLY A PERSON AT THE TOP OF THE
18 PYRAMID, YES.

19 Q WOULD IT BE FAIR TO SAY THAT THE PEOPLE AT THE
20 LOWER LEVEL OUTER FRINGE ARE DEPRIVED OF THE SAME
21 INFORMATION THAT THOSE AT THE UPPER REACHES OF THE HIERARCHY
22 ARE ENTITLED TO?

23 A I WOULDN'T USE THE WORD DEPRIVED. I THINK THAT
24 IS SETTING UP A PARTICULAR QUESTION. I THINK THEY ARE NOT
25 PRIVY TO ANY PARTICULAR TYPE OF QUESTION. JUST LIKE YOU
26 HAVE IN ANY OTHER ORGANIZATION, THOSE AT THE TOP ARE MORE
27 PRIVY THAN THOSE AT THE BOTTOM.

28 Q DO YOU KNOW ANYTHING ABOUT THIS CHURCH, CHURCH

1947

1 UNIVERSAL?

2 A ALL I KNOW IS WHAT I HAVE READ, JUST A
3 SMATTERING. I WOULDN'T CONSIDER MYSELF ANYWHERE NEAR
4 KNOWLEDGEABLE.

5 Q IF I UNDERSTAND YOU CORRECTLY, YOU KNOW NOTHING
6 ABOUT THIS CHURCH, NOTHING ABOUT THEIR DEALINGS, NOTHING
7 ABOUT THEIR MEMBERS, NOTHING ABOUT WHAT THEY GO THROUGH, BUT
8 WHAT YOU ARE TESTIFYING TO TODAY IS A GENERAL OVERVIEW OF
9 YOUR INVOLVEMENT OVER THE PAST, WHAT IS IT, 15 YEARS, WITH
10 SOME OF THE NEW WAVE RELIGIONS?

11 A MANY OF THE NEW WAVE RELIGIONS OVER A PERIOD OF
12 MANY YEARS.

13 WHAT I DO KNOW ABOUT THIS GROUP IS WHAT I HAVE
14 READ FROM EXTENSIVE DEPOSITIONS AND TESTIMONY FROM PEOPLE
15 VERY CRITICAL OF THIS PARTICULAR GROUP. AND WHAT I HAVE --
16 WELL, FROM ALL THE THINGS THAT I MENTIONED IN PREPARATION
17 FOR THIS CASE. I HAVE DONE NO FURTHER THAN THAT.

18 Q FROM PEOPLE VERY CRITICAL OF THIS CHURCH. SO
19 FAR YOU HAVE TOLD US YOU READ THE DEPOSITIONS OR THE TRIAL
20 TESTIMONY OF THE PEOPLE WHO HAVE TESTIFIED HERE AND MR.
21 MULL?

22 A THAT'S RIGHT.

23 Q IS IT YOUR PROFESSIONAL OPINION THAT RABBI
24 ROBBINS OR DR. SINGER OR MISS KATHLEEN LEVY OR DR. AFSHAR
25 ARE HOSTILE TO THIS PARTICULAR CHURCH?

26 A YES. AFTER READING DR. SINGER AND DR. -- AND
27 RABBI ROBBINS AND MRS. LEVY, I WOULD SAY THEY ARE HOSTILE TO
28 THIS CHURCH, YES. HAVE I GOT THE DEFINITION OF HOSTILE

1948

1 WRONG? THEY ARE EXTREMELY CRITICAL.

2 Q AND YOUR TESTIMONY IS BENIGN AND JUST
3 APPROACHES THE AREA OF JUST NEW WAVE RELIGIONS THAT YOU'VE
4 COME IN CONTACT WITH.

5 LET ME ASK YOU A QUESTION. IF YOU ARE GOING TO
6 INQUIRE WHETHER OR NOT SOMEONE STOLE SOMETHING, AND YOU
7 INQUIRE OF THE THIEF -- IF YOU ASK THE THIEF WHETHER HE
8 STOLE SOMETHING, ISN'T IT A POSSIBILITY THAT HE IS GOING TO
9 DO WHAT HE CAN TO DEFEND HIMSELF AND NOT BE TOTALLY OPEN
10 WITH YOU?

11 A IF YOU ASK THE PERSON FROM WHOM HE STOLE, HE
12 ALSO WILL HAVE THE BEST INTEREST IN CONVINCING YOU.

13 Q HAVE YOU READ ANY OF THE DEPOSITIONS OR ANY OF
14 THE TRIAL TESTIMONY OF ANY OF THE PEOPLE WHO HAVE TESTIFIED
15 FOR THE CHURCH?

16 A I HAVE TO RECALL THAT. I DON'T THINK SO.

17 Q THEN YOU WOULDN'T KNOW WHETHER THERE WAS
18 EQUIVOCATION OR OUTRIGHT LYING IN THE TESTIMONY, WOULD YOU,
19 DOCTOR?

20 A NO, I DIDN'T SAY THERE WAS LYING.

21 Q NO, NO, NO. I ASKED YOU WHETHER OR NOT YOU
22 HAVE READ THE TESTIMONY OF THE PEOPLE WHO HAVE TESTIFIED
23 THUS FAR FOR THE CHURCH, AND YOU TOLD ME YOU DIDN'T THINK
24 YOU HAD. MY QUESTION IS TO YOU IF YOU HAVEN'T READ IT, YOU
25 WOULDN'T KNOW WHETHER THEIR TESTIMONY WAS FULL OF
26 EQUIVOCATION OR LIES, WOULD YOU?

27 A TRUE.

28 Q HAVE YOU EVER IN THE COURSE OF YOUR

1949

1 PROFESSIONAL PRACTICE COUNSELED WITH ANYONE WHO HAD SPENT AN
2 EXTENSIVE PERIOD OF TIME IN A NEW WAVE RELIGIOUS
3 ORGANIZATION THAT SUFFERED ANY EFFECTS THAT YOU WOULD
4 CONSIDER TO BE NEGATIVE EFFECTS?

5 A YES.

6 Q WOULD YOU TELL US THE NATURE OF THOSE EFFECTS
7 THAT THEY MIGHT HAVE SUFFERED?

8 A I MENTIONED EARLIER THE INDIVIDUALS COMING OUT
9 OF AN INTENSE BELIEF SYSTEM, GROUP MOVEMENT, AFTER AN
10 EXTENDED PERIOD OF TIME IN THAT PERIOD OF TIME IN THAT
11 MOVEMENT WHERE THEY ARE TOTALLY COMMITTED TO A CAUSE AND A
12 GROUP AND HAVE DEVELOPED CLOSE RELATIONSHIPS AND OVERRIDING
13 IDEOLOGY, UPON LEAVING THAT PARTICULAR GROUP FOR WHATEVER
14 REASON HAVE A PERIOD OF A FEW MONTHS WHICH I LIKEN TO
15 CULTURE SHOCK.

16 AND THERE ARE FEELINGS OF DEPRESSION AT TIMES,
17 ANXIETY, MANIFESTING LACK OF SLEEP, TREMULOUSNESS,
18 CONFUSION, WORRY ABOUT THE FUTURE. REVERSION TO THE SAME
19 KIND OF DEMORALIZATION AND QUESTION ABOUT THE SELF THAT LED
20 THEM IN TO THE GROUP IN THE FIRST PLACE WILL RETURN.

21 THEY ARE ASHAMED FOR HAVING ABANDONED THEIR
22 FAMILY AT THE TIME. THEY ARE ASHAMED, ALSO, BELIEVE IT OR
23 NOT, FOR HAVING LEFT THE GROUP, HUMILIATION. THERE IS
24 WONDERMENT ABOUT THEIR FUTURE. IF THEY WERE HAVING A
25 DIFFICULT TIME BEFORE GETTING INTO THE GROUP, THEY WILL HAVE
26 A DIFFICULT TIME THEN. ALL OF THIS TENDS TO REINTEGRATE IN
27 THE INDIVIDUAL IN A PERIOD OF A FEW MONTHS.

28 IN OUR FOLLOW-UP STUDIES WE HAVE FOUND THESE

1950

1 INDIVIDUALS BEGINNING AGAIN WHATEVER PURSUITS THEY HAD LEFT
2 OFF BEFORE THAT TIME. NOW SOMETIMES THERE IS AN IRREVOCABLE
3 TIME LOSS ESPECIALLY IN SOMEBODY WHO IS INVOLVED IN SPECIFIC
4 KINDS OF STUDIES. SO THOSE, I WOULD SAY, THEY ARE
5 NEGATIVE -- THAT IS YOUR QUESTION, THOSE ARE NEGATIVE
6 EFFECTS. THEY ARE TEMPORARY, THEY ARE TRANSIENT BUT THEY DO
7 OCCUR.

8 Q HAVE YOU EVER SEEN ANY PERMANENT EFFECTS?

9 A I HAVEN'T.

10 Q YOUR STUDIES DEALT MOSTLY WITH THE GROUP -- THE
11 AGE GROUP BETWEEN 18 AND 26?

12 A IN THE STUDIES, YES. BUT I HAVE SEEN MANY
13 PEOPLE WHO ARE DIFFERENT AGES.

14 Q IF SOMEONE WERE 55 OR 60 AND THEY WENT THROUGH
15 WHAT MAY BEST BE TERMED A TRAUMATIC EXPERIENCE, WOULD IT BE
16 REASONABLE TO ASSUME THAT THE RECOVERY PERIOD FOR THEM MIGHT
17 BE LONGER?

18 A IT'S POSSIBLE. BUT I HAVE SEEN PEOPLE -- IT'S
19 POSSIBLE. I HAVE SEEN PEOPLE OF THAT AGE TOO WHO HAVE COME
20 OUT OF VARIOUS KINDS OF RELIGIOUS GROUPS AND THEY HAVE
21 GOTTEN OVER IT IN A MATTER OF A FEW MONTHS. I HAVE SEEN
22 PEOPLE OF AGES OLDER THAN MR. MULL AND YOUNGER ALL THE WAY
23 DOWN TO THOSE YOU MENTIONED IN MY STUDIES. AGAIN I STAND BY
24 THAT -- ABOUT SIX MONTHS TO REINTEGRATE.

25 Q NOW, YOUR -- MOST OF YOUR STUDIES YOU SAID
26 PEOPLE GO INTO THESE NEW WAVE ORGANIZATIONS STAY SOME SIX
27 MONTHS TO TWO YEARS AND THEN THEY GET OUT?

28 A MOST DO, YES.

1 Q WHAT IF SOMEBODY WERE ASSOCIATED FOR TEN OR
2 TWELVE YEARS?

3 A IT IS HARDER FOR THEM.

4 Q WHAT IF SOMEONE HAS A PREEXISTING CONDITION OF
5 A PSYCHOLOGICAL PROBLEM, IF THEY WERE EXPOSED TO THE KIND OF
6 TRAUMA AND STRESS THAT I DESCRIBED TO YOU, IS IT AT ALL
7 POSSIBLE UNDER ANY CIRCUMSTANCES THAT SOMEONE MIGHT BE
8 PERMANENTLY PSYCHOLOGICALLY INJURED?

9 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THAT
10 AS ASKING FOR SPECULATION. WHETHER IT IS AT ALL POSSIBLE
11 UNDER ANY CIRCUMSTANCES.

12 THE COURT: SUSTAINED.

13 Q BY MR. LEVY: THEN LET ME GIVE YOU A
14 HYPOTHETICAL. WHAT IF SOMEBODY IS RECRUITED, INDOCTRINATED,
15 NURTURED OVER A PERIOD OF YEARS, CONNED INTO GIVING UP A WAY
16 OF LIFE AND A BUSINESS, THEY MOVE FROM THE AREA THAT THEY
17 HAVE LIVED IN FOR YEARS, MOVE ONTO CHURCH PROPERTY, THEY ARE
18 SUBJECTED TO PRESSURES ABOUT MONEY, ABOUT PERMANENT STAFF,
19 ABOUT A CHANGE OF LIFE, ABOUT A MARRIAGE, ABOUT THEIR
20 PROPERTY, THEY ARE PROMISED CERTAIN THINGS BEFORE THEY GO
21 THERE AND THE THINGS THEY ARE PROMISED GET CHANGED, PROMISES
22 ARE NOT KEPT, AND THEN THEY ARE KICKED OUT, DO YOU THINK
23 THAT MIGHT HAVE THE PSYCHOLOGICAL EFFECT ON THEM THAT THEY
24 MIGHT NOT GET OVER WITH IN A FEW MONTHS OR SIX MONTHS?

25 A YOU ARE USING WORDS LIKE CONNED AND
26 INDOCTRINATED. IF THE HYPOTHETICAL EXAMPLE YOU ARE GIVING
27 IS FACTUAL, I WOULD SAY THE INDIVIDUAL UNDER THOSE
28 CIRCUMSTANCES WOULD HAVE A DIFFICULT TIME AND IT MIGHT TAKE

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1 LONGER THAN SIX MONTHS. WHETHER THAT WOULD BE PERMANENT, I
2 WOULD HAVE NO WAY OF KNOWING UNTIL I MET THE INDIVIDUAL.

3 Q IS IT POSSIBLE THAT ANY CIRCUMSTANCES IN YOUR
4 MIND CAN POSSIBLY EXIST THAT COULD CREATE PERMANENT
5 PSYCHOLOGICAL DAMAGE?

6 MR. KLEIN: I AM GOING TO OBJECT AGAIN BECAUSE IT
7 CALLS FOR SPECULATION, YOUR HONOR.

8 THE COURT: HE CAN ANSWER.

9 THE WITNESS: I GUESS I CAN ENVISION IN ANY KIND OF
10 FANTASY PERMANENT -- SEVERE ENOUGH DAMAGE. WE ALL HAVE
11 BREAKING POINTS, MR. LEVY. I JUST HAVEN'T SEEN THEM IN
12 THESE PARTICULAR GROUPS.

13 Q BY MR. LEVY: HAVE YOU EVER LIVED WITH ANY OF
14 THOSE GROUPS?

15 A LIVED WITH THEM? NO, I HAVE NEVER LIVED WITH
16 THEM.

17 Q JUST ONE LAST GROUP I WILL ASK YOU ABOUT. DO
18 YOU THINK THE PEOPLE WHO WENT TO JONESTOWN SUFFERED ANY
19 IRREVOCABLE DAMAGES OR PERMANENT DAMAGES AS A RESULT OF
20 THEIR CULT EXPERIENCE?

21 A YOU WANT ME TO ANSWER THAT?

22 Q IF YOU WANT TO BOTHER.

23 MR. KLEIN: I AM GOING TO OBJECT AS ARGUMENTATIVE AND
24 IRRELEVANT, YOUR HONOR.

25 THE COURT: SUSTAINED.

26 MR. LEVY: I HAVE NOTHING FURTHER AT THIS TIME, YOUR
27 HONOR.

28 ///

REDIRECT EXAMINATION

1
2 BY MR. KLEIN:

3 Q IN YOUR EXPERIENCE WITH NEW WAVE, NEW AGE
4 RELIGIOUS GROUPS, HAVE YOU COME ACROSS ANY WHO TEACH THAT
5 THE ONLY WAY TO SALVATION IS THROUGH THE TEACHINGS OF THAT
6 GROUP?

7 A YES.

8 Q IS THAT SOMETHING THAT IS COMMON OR UNCOMMON?

9 A I'D SAY FOR THE FUNDAMENTALIST RELIGIOUS GROUPS
10 OF VARIOUS KINDS OF DIFFERENT BACKGROUND, THAT IS QUITE
11 COMMON.

12 Q YOU TALKED ABOUT THOUGHT REFORM IN RESPONSE TO
13 ONE OF MR. LEVY'S QUESTIONS. HE ASKED YOU IF YOU WERE AN
14 EXPERT ON THOUGHT REFORM. HOW DO YOU DEFINE THOUGHT REFORM
15 WHEN YOU WERE ANSWERING THAT QUESTION?

16 A I DID DEFINE IT BEFORE. I EQUATE THOUGHT
17 REFORM WITH A VERY INTENSE, COERCIVE SEQUENCE OF -- CALL
18 THEM PSYCHOTECHNOLOGICAL STRATEGIES OF BOTH SEDUCTION AND
19 IMPOSITION OF PRESSURE IN ORDER TO CONVERT A BELIEF INTO
20 ANOTHER BELIEF OR IN ORDER TO ENSNARE AND ULTIMATELY TO
21 ENSLAVE USUALLY IF NOT ALWAYS UNDER THE THREAT OF IMPLIED OR
22 EXPLICIT VIOLENCE OF SOME KIND. IT WAS COINED -- I READ DR.
23 SINGER'S GENERIC --

24 MR. LEVY: EXCUSE ME, YOUR HONOR. AT THIS POINT I AM
25 GOING TO OBJECT. IT'S GONE WELL BEYOND THE QUESTION AND ANY
26 OTHER SELF-SERVING COMMENTS I WOULD MOVE THAT THEY BE
27 STRICKEN.

28 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

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1 Q BY MR. KLEIN: WHAT ARE EXAMPLES OF THOUGHT
2 REFORM THAT COME TO MIND TO YOU?

3 MR. LEVY: I AM GOING TO HAVE TO OBJECT, YOUR HONOR.
4 THIS WITNESS HAS TESTIFIED HE IS NOT AN EXPERT ON THOUGHT
5 REFORM.

6 THE COURT: HE CAN ANSWER.

7 THE WITNESS: THE MOST PREVALENT IS IN TERMS OF THE
8 KOREAN WAR THAT ROBERT J. LIFTON WROTE ABOUT.

9 Q BY MR. KLEIN: AS YOU DEFINED THOUGHT REFORM,
10 DO YOU KNOW OF ANY NEW AGE RELIGIONS THAT YOU HAVE FOUND TO
11 USE THOUGHT REFORM?

12 A NO, I DO NOT.

13 Q WHEN MR. LEVY GAVE YOU THAT LONG HYPOTHETICAL
14 BEFORE LUNCH, IN RESPONSE TO IT, YOU SAID SOMETHING ABOUT
15 WELL, IF THERE ARE NO REDEEMING FEATURES AND THEN GAVE YOUR
16 ANSWER. WHAT WOULD YOU CONSIDER REDEEMING FEATURES THAT YOU
17 WERE REFERRING TO WHEN YOU ANSWERED HIS QUESTION?

18 A THE -- THIS IS WHY THIS GETS TO BE A VERY
19 COMPLICATED AREA AND WHY THEY ARE CALLED ALTERNATIVE HEALING
20 NETWORKS FROM DIFFERENT ASPECTS. THESE GROUPS CAN OFFER AT
21 ONE AND THE SAME TIME THESE THINGS THAT MR. LEVY LISTED
22 MIGHT ALSO SUPPLY A SENSE OF PERSONAL ENHANCEMENT, A SENSE
23 OF BEING NURTURED AND SUPPORTED BY THE GROUP, A DEEP SENSE
24 OF BELONGING TO THE GROUP, A SENSE OF SIGNIFICANCE AND
25 IMPORTANCE TO THEMSELVES AND TO SOCIETY AND SPIRITUAL
26 IMPORTANCE. ALL THESE ARE WHAT I MEANT BY REDEEMING
27 FEATURES.

28 Q AND TO THE EXTENT THAT THOSE REDEEMING FEATURES

1955

1 ARE PRESENT, WOULD THAT AFFECT THE CONCLUSION AS TO WHETHER
2 THESE GROUPS CAN DO PERMANENT EMOTIONAL DAMAGE TO AN
3 INDIVIDUAL?

4 A WELL, YES, IT WOULD HAVE TO MODIFY IT TO SOME
5 EXTENT. IF A GROUP IS DESCRIBED IN TERMS OF THE SIX
6 CHARACTERISTICS THAT DR. SINGER MENTIONED OR MR. LEVY'S
7 EXAMPLE, IF THAT IS ALL THERE IS TO A GROUP AND NOTHING
8 ELSE, THEN OF COURSE THEIR INFLUENCE WOULD HAVE TO BE MORE
9 NEGATIVE AND MORE INTRUSIVE.

10 Q MR. LEVY, IN HIS QUESTIONS, HE GAVE YOU A
11 HYPOTHETICAL. HE GAVE YOU A COUPLE OF THEM WHERE HE TALKED
12 ABOUT AN ABIDING BELIEF IN THE SPIRITUAL LEADER. IN YOUR
13 STUDIES OF RELIGIOUS GROUPS OVER THE YEARS YOU HAVE BEEN
14 DOING IT, IS IT COMMON OR UNCOMMON TO FIND TRUE BELIEVERS
15 THAT HAVE AN ABIDING BELIEF IN THEIR SPIRITUAL LEADER?

16 A YES.

17 Q IS IT COMMON OR UNCOMMON TO FIND THAT --

18 A OH, I AM SORRY. I WOULD SAY IT IS COMMON.

19 Q YOU TALKED, IN RESPONSE TO SOME OF MR. LEVY'S
20 QUESTIONS, ABOUT THE NEGATIVE EFFECTS UPON LEAVING A
21 RELIGIOUS CULT OR GROUP. ARE THERE NEGATIVE EFFECTS IN THE
22 BREAKUP OF A MARRIAGE?

23 A ALONG THE SAME LINES, YES.

24 Q ARE THEIR NEGATIVE EFFECTS WHEN YOU LEAVE A JOB
25 THAT YOU'VE HAD FOR 20 YEARS?

26 A THERE CAN BE.

27 Q AND CAN THE NEGATIVE EFFECTS THAT YOU HAVE FOR
28 LEAVING YOUR MARRIAGE AND MAYBE A LONG STANDING MARRIAGE,

1 LEAVING YOUR JOB, CAN THEY BE OF THE SAME NATURE AS THE
2 NEGATIVE EFFECTS YOU'VE DESCRIBED THAT OCCUR WHEN YOU LEAVE
3 ONE OF THESE RELIGIOUS GROUPS?

4 A WELL, EMOTIONALLY AND COGNITIVELY THEY CAN BE
5 OF THE SAME NATURE IN THAT THEY MIGHT CREATE THE SAME DEGREE
6 OF DISCOMFORT, DYSPHORIA, UNHAPPINESS, MISERY, CONFUSION, ET
7 CETERA, FOR DIFFERENT REASONS. BUT YES.

8 MR. KLEIN: THANK YOU.

9 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

10 MR. LEVY: JUST ONE LAST QUESTION. YOUR HONOR.

11
12 RE-CROSS-EXAMINATION

13 BY MR. LEVY:

14 Q THERE IS A STATEMENT ATTRIBUTED TO YOU IN YOUR
15 ARTICLE IN PSYCHOLOGY TODAY AND I JUST WANT TO KNOW WHETHER
16 IT IS AN ACCURATE STATEMENT. IT SAYS ALL --

17 MR. KLEIN: COULD YOU TELL ME WHAT PAGE YOU ARE
18 READING FROM?

19 MR. LEVY: PAGE 23. IT SAYS:

20 "ALTHOUGH THERE IS AN
21 UNDERLYING STRUCTURE THAT MAKES THESE
22 GROUPS SIMILAR -- THE FANTASIZED
23 OMNISCIENCE OF THE LEADERS, THE RIGID
24 BELIEF SYSTEMS OPPOSED TO THE OUTSIDE
25 WORLD AND A STUDIED STRANGENESS -- THE
26 EARMARK OF A RADICAL DEPARTURE IS LESS
27 THE SPECIFIC CHARACTERISTICS OF THE GROUP
28 THAN THE RAPID, TOTAL TRANSFORMATION OF THE

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1 JOINER."

2 THE WITNESS: YES.

3 Q BY MR. LEVY: DOES THAT MEAN THAT WHEN SOMEONE
4 IS EXPOSED TO THE TOTALITY OF A QUASI-RELIGIOUS CULT GROUP,
5 THAT THE AFFECT OF THOSE CHARACTERISTICS IS GOING TO IMPACT
6 ENORMOUSLY UPON THE INDIVIDUAL WHO MAY BE SEDUCED INTO
7 BECOMING PART OF THAT ORGANIZATION?

8 A IT WOULD IMPACT ON THOSE -- REALLY THOSE VERY
9 FEW INDIVIDUALS WHO ARE LOOKING ON A QUEST AT THAT TIME FOR
10 THAT VERY THING, MR. LEVY.

11 Q AND THEN THE LAST QUESTION, DOCTOR. YOU TALKED
12 ABOUT REDEEMING FEATURES. IS IT POSSIBLE THAT THE REDEEMING
13 FEATURES COULD BE SO IMPROBABLE OF ACHIEVING, THAT THE
14 REDEEMING FEATURES COULD BE PART OF THE SEDUCTION?

15 MR. KLEIN: YOUR HONOR, I WOULD OBJECT AGAIN. IT
16 CALLS FOR SPECULATION WHEN HE ASKS IF IT IS POSSIBLE.

17 THE COURT: HE CAN ANSWER.

18 THE WITNESS: I THINK THE REDEEMING FEATURES CAN BE
19 PART OF THE SEDUCTION, MR. LEVY. IF THAT IS YOUR QUESTION.

20 MR. LEVY: YES, IT IS. THANK YOU.

21 NO FURTHER QUESTIONS, YOUR HONOR.

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

23 THE COURT: OKAY.

24 THANK YOU.

25 YOU ARE EXCUSED.

26 THE WITNESS: THANK YOU.

27 MR. KLEIN: YOUR HONOR, MAY THIS WITNESS REMAIN IN
28 THE COURTROOM FOR THE REST OF THIS AFTERNOON?

1 THE COURT: VERY WELL.

2 MR. KLEIN: WE WOULD CALL AS OUR NEXT WITNESS DOROTHY
3 WHITEHEAD, YOUR HONOR.

4
5 DOROTHY WHITEHEAD, +

6 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
7 TESTIFIES AS FOLLOWS:

8 THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.
9 MOVE YOUR SEAT UP. PLEASE STATE YOUR NAME FOR THE RECORD
10 AND PLEASE SPELL YOUR FIRST AND LAST NAME.

11 THE WITNESS: I AM DOROTHY WHITEHEAD. D-O-R-O-T-H-Y.

12 THE CLERK: ONE MORE TIME SLOWER.

13 THE WITNESS: D-O-R-O-T-H-Y; WHITEHEAD,
14 W-H-I-T-E-H-E-A-D.

15 THE CLERK: THANK YOU.

16
17 DIRECT EXAMINATION +

18 BY MR. KLEIN:

19 Q MRS. WHITEHEAD, ARE YOU CURRENTLY EMPLOYED?

20 A YES, I AM.

21 Q I THINK YOU BETTER TALK INTO THE MICROPHONE.

22 A YES, I AM.

23 Q WHERE ARE YOU EMPLOYED?

24 A I AM A REGISTERED NURSE AND I TAKE CALL FOR
25 THREE REGISTRIES IN SAN FRANCISCO.

26 Q HOW LONG HAVE YOU BEEN A REGISTERED NURSE?

27 A A GOOD 30 YEARS.

28 Q ARE YOU PRESENTLY A MEMBER OF CHURCH UNIVERSAL

1 AND TRIUMPHANT?

2 A I AM.

3 Q ARE YOU A STAFF MEMBER?

4 A NO.

5 Q DO YOU KNOW GREGORY MULL?

6 A YES, I DO.

7 Q WHEN DID YOU FIRST MEET HIM?

8 A I BELIEVE IT WAS, TO THE BEST OF MY KNOWLEDGE,
9 LATE 1974.

10 Q HOW DID YOU MEET HIM?

11 A I WAS INVITED TO ONE OF HIS MEDITATION GROUPS.

12 Q DID YOU GO TO THE MEDITATION GROUP?

13 A YES, I DID.

14 Q WHERE WAS IT HELD?

15 A IT WAS HELD AT -- I GUESS IT WAS HIS HOUSE IN
16 SAN FRANCISCO ON CASELLI STREET. I WAS ESCORTED THERE BY A
17 VERY GOOD FRIEND.

18 Q AND WAS THERE A SERVICE THERE OR SOME KIND OF
19 READING?

20 A WELL, IT WAS KIND OF -- I KIND OF LOOK BACK ON
21 IT LIKE IT WAS KIND OF A SOCIAL EVENT AND EVERYTHING REALLY.
22 WE DIDN'T GO TOO MANY TIMES. HE -- GREGORY APPEARED WITH A
23 LONG FLOWING CAFTAN, A LONG FLOWING ROBE AND --

24 MR. LEVY: AT THIS POINT, YOUR HONOR, I AM GOING TO
25 OBJECT. IT IS BECOMING A NARRATIVE.

26 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

27 MR. KLEIN: OKAY.

28 Q DID YOU GO TO ANY OTHER MEDITATION SERVICES AT

1 HIS HOUSE OTHER THAN THE ONE YOU JUST MENTIONED?

2 A YES, WE DID. ABOUT TWO OR THREE MORE.

3 Q NOW, THE FIRST TIME YOU WENT, WAS HE IN -- LET
4 ME WITHDRAW THAT.

5 THE FIRST TIME YOU WENT, WAS THERE ANYBODY
6 THERE FROM CHURCH UNIVERSAL AND TRIUMPHANT OR SUMMIT
7 LIGHTHOUSE?

8 A JUST MYSELF. NO, THERE WASN'T ANYBODY. EXCUSE
9 ME.

10 Q WHEN YOU WENT THE FIRST TIME, WERE YOU IN ANY
11 WAY AFFILIATED WITH CHURCH UNIVERSAL AND TRIUMPHANT?

12 A NO, I WASN'T.

13 Q WHEN YOU WENT THE FIRST TIME, WAS THERE ANY
14 MENTION AT ALL OF CHURCH UNIVERSAL AND TRIUMPHANT?

15 A NO.

16 Q NOW, DID THERE COME A TIME WHEN YOU WENT TO
17 GREGORY MULL'S HOUSE AND THERE WAS SOME MENTION OF CHURCH
18 UNIVERSAL AND TRIUMPHANT AT A SERVICE?

19 A THAT IS CORRECT.

20 Q AND WHEN DID THAT OCCUR IN RELATION TO THAT
21 FIRST SERVICE YOU MENTIONED?

22 A THAT WAS THE SECOND -- SECOND TIME WE WENT. WE
23 REALLY WEREN'T GOING TO GO THE SECOND TIME, MY FRIEND AND I.
24 BUT WE WERE TOLD THAT THERE WERE GOING TO BE TWO PEOPLE FROM
25 THE SUMMIT LIGHTHOUSE THERE BRINGING THEIR MEDITATIONS AND
26 SOME OF THEIR TEACHINGS THAT WE MIGHT BE VERY INTERESTED IN.

27 Q WHEN YOU SAY, "THE SUMMIT LIGHTHOUSE," IS THAT
28 THE PREDECESSOR NAME OF CHURCH UNIVERSAL AND TRIUMPHANT?

1 A YES, IT IS.

2 Q AND DID YOU GO TO THE SERVICE WHEN THE PEOPLE
3 FROM THE SUMMIT LIGHTHOUSE WERE THERE?

4 A YES, I DID.

5 Q AND DID YOU GO TO ANY OTHER SERVICES IN GREGORY
6 MULL'S HOUSE AFTER THAT?

7 A WELL, AT THAT PARTICULAR HOUSE WHERE HE HELD
8 THE MEDITATION GROUP, WE WENT ONE MORE TIME.

9 MR. LEVY: I AM GOING TO OBJECT, YOUR HONOR. IT IS A
10 YES OR NO QUESTION. WE ARE GETTING ANOTHER NARRATIVE.

11 THE COURT: TRY TO LIMIT YOUR ANSWERS TO THE
12 QUESTIONS ASKED OF YOU AND THEN WAIT FOR THE NEXT QUESTION.

13 THE WITNESS: OKAY, JUDGE.

14 Q BY MR. KLEIN: AT THAT PARTICULAR HOUSE, DID
15 YOU GO TO ANY OTHER MEDITATION SERVICES AFTER THE TWO YOU
16 HAVE DESCRIBED?

17 A ONE MORE.

18 Q AND DID YOU EVER GO TO ANY OTHER CHURCH
19 UNIVERSAL TYPE SERVICES AT A HOUSE OWNED BY GREGORY MULL?

20 A YES, I DID.

21 Q WHEN WAS THAT?

22 A WELL, THAT WAS FOLLOWING WHEN HE CAME HOME FROM
23 SUMMIT UNIVERSITY. I BELIEVE IT -- THAT WAS -- I BELIEVE
24 THE BEST OF MY KNOWLEDGE, THAT WAS 1975.

25 Q NOW, DID YOU EVER HAVE OCCASION TO HAVE A
26 CONVERSATION WITH GREGORY MULL WHERE HE DISCUSSED WITH YOU
27 THE CLEARANCE LETTER THAT HE WROTE AT SUMMIT UNIVERSITY?

28 A YES, I DID.

1 Q WHEN DID THAT CONVERSATION OCCUR?

2 A IN MY LIVING ROOM WHEN I PROVIDED A HOME FOR
3 HIM TO HAVE HIS POTLUCK DINNER TO TALK TO HIS FRIENDS AND A
4 GROUP OF PEOPLE ABOUT THE TEACHINGS.

5 Q WAS THIS AFTER HE HAD RETURNED FROM SUMMIT
6 UNIVERSITY?

7 A YES. HE WAS VERY EXCITED ABOUT HAVING GONE --
8 MR. LEVY: YOUR HONOR, AT THIS TIME I AM GOING TO
9 OBJECT. I WONDER IF MR. KLEIN COULD LEAD HIS WITNESS JUST A
10 LITTLE BIT LESS.

11 MR. KLEIN: YOUR HONOR, I WOULD OBJECT TO THAT
12 CHARACTERIZATION.

13 THE COURT: BOTH OF YOU STOP.

14 IF YOU HAVE AN OBJECTION TO MAKE, MR. LEVY,
15 STATE THE LEGAL GROUNDS WITHOUT RHETORIC.

16 MR. LEVY: OBJECTION, YOUR HONOR. LEADING.

17 THE COURT: SUSTAINED.

18 Q BY MR. KLEIN: THIS CONVERSATION, WERE THERE
19 OTHER PEOPLE PRESENT WHEN IT OCCURRED?

20 A YES, THERE WERE.

21 Q ABOUT HOW MANY?

22 A TO THE BEST OF MY KNOWLEDGE, I'D SAY ABOUT 12
23 PEOPLE, INCLUDING MYSELF.

24 Q COULD YOU TELL US WHAT MR. MULL SAID DURING
25 THAT CONVERSATION ABOUT HIS CLEARANCE LETTER?

26 A WELL, HE WAS VERY EXCITED TO TELL WHAT WENT ON
27 AT THE SUMMIT UNIVERSITY. AND AMONG OTHER THINGS, HE SAID
28 THAT YOU HAD TO WRITE A CLEARANCE LETTER AND PUT DOWN --

1 RECORD ALL OF THE THINGS THAT YOU EVER DID WRONG, INCLUDING
2 ANY DRUGS YOU HAD TAKEN OR ANY RELATIONSHIPS, PERSONAL
3 RELATIONSHIPS, SEXUAL BEHAVIOR, ANY OF THAT.

4 AND SOMEONE -- AND HE SAID THAT -- HE WENT ON
5 TO SAY THAT HIS LETTER THEN WAS GIVEN TO MOTHER, SHE READ IT
6 AND IT WAS BURNED. AND THEN HE WOULD KNEEL -- THE PERSON
7 WOULD KNEEL BEFORE MOTHER AND SHE WOULD SAY PRAYERS OVER THE
8 INDIVIDUAL.

9 AND HE SAID IT WAS THE FIRST TIME -- THEY HAD
10 SAVED HIM UNTIL LAST BECAUSE HIS LETTER WAS SO LONG, HAD SO
11 MUCH IN IT THAT THEY HAD TO PULL UP A CHAIR FOR MOTHER TO
12 SIT DOWN AND READ IT.

13 Q DID HE SAY ANYTHING ELSE?

14 A WELL, SOMEBODY IN THE ROOM, I CAN'T REMEMBER
15 WHO, MADE SOME JOKING REMARK. AND GREGORY SAID THAT, "WELL,
16 IT DOESN'T MAKE ANY DIFFERENCE WHAT YOU PUT IN IT BECAUSE IT
17 IS GOING TO BE BURNED ANYWAY."

18 AND HE SAID, "I'VE DONE EVERYTHING ANYWAY FROM
19 DRUGS TO ALL KINDS OF RELATIONSHIPS." AND THEN HE WENT ON
20 TO SAY THAT HE COULD NOT FEEL LOVE AT ONE TIME IN WHICH HE
21 HAD EIGHT OR NINE GUYS PILE ON TOP OF HIM.

22 Q WHAT DID YOU DO WHEN HE SAID THAT?

23 A WELL, I WAS KIND OF EMBARRASSED SO I GOT UP AND
24 LEFT THE ROOM.

25 Q WERE ALL OF THOSE 12 PEOPLE PRESENT WHEN HE
26 MADE THOSE STATEMENTS?

27 A AS FAR AS I CAN REMEMBER.

28 MR. KLEIN: THANK YOU.

1 I HAVE NO FURTHER QUESTIONS.

2

3 CROSS-EXAMINATION +

4 BY MR. LEVY:

5 Q MISS WHITEHEAD, WERE THOSE 10 OR 12 OTHER
6 PEOPLE THERE YOUR FRIENDS?

7 A NO. THEY WERE MOSTLY GREGORY'S FRIENDS.

8 Q GREGORY UTILIZED YOUR HOME FOR A POTLUCK DINNER
9 FOR HIS FRIENDS?

10 A THIS IS TRUE.

11 Q WAS THERE ANY REASON WHY HE TOLD YOU THAT HE
12 WANTED TO USE YOUR HOME FOR A POTLUCK DINNER FOR HIS FRIENDS
13 AS OPPOSED TO HIS HOME FOR HIS FRIENDS?

14 A HE JUST SAID THAT HE WANTED TO -- A NICE HOUSE
15 TO HOLD A POTLUCK DINNER SO THAT HE COULD GATHER ALL THESE
16 PEOPLE TOGETHER AND TELL THEM ABOUT S.U., AND THAT I SHOULD
17 DO THIS. AND I WAS JUST COMING INTO THE TEACHINGS, AND SO I
18 THOUGHT I SHOULD BE CHARITABLE AND OFFER MY HOUSE.

19 Q WAS THERE ANYONE AT YOUR HOME BESIDE YOURSELF
20 WHO WAS NOT A FRIEND OF GREGORY MULL?

21 A I THINK MY SON WAS SOMEWHERE AROUND THERE.

22 Q SO EVERYONE THAT CAME THERE BESIDE -- CAME TO
23 YOUR HOME WAS A PERSONAL FRIEND OF GREGORY MULL'S?

24 A NO, I WOULDN'T SAY THEY WERE A PERSONAL FRIEND.
25 THEY WERE AN ACQUAINTANCE, MANY OF THEM. I KNOW THE
26 FRIEND -- MY FRIEND WHO WAS MY ESCORT AT A LOT OF THESE
27 EVENTS, HE WAS NOT A CLOSE FRIEND OF GREGORY NOR WAS I. WE
28 WERE JUST AN ACQUAINTANCE BECAUSE WE WERE INTERESTED IN THE

1 TEACHINGS.

2 Q NOW, CAN YOU TELL US GENERALLY WHAT YOU TALKED
3 ABOUT DURING THE COURSE OF THE EVENING?

4 OR WAS THIS AT NIGHT BY THE WAY?

5 A THIS WAS IN THE EVENING, UH-HUH.

6 Q CAN YOU TELL ME WHAT ALL OF THESE 10 OR 12
7 PEOPLE AND YOUR SON AND YOURSELF TALKED ABOUT?

8 A MY SON WAS NOT PRESENT.

9 Q WELL THEN, WHAT ABOUT THESE 10 OR 12 PEOPLE AND
10 GREGORY AND YOURSELF?

11 A WELL, IT WAS MAINLY GREGORY BECAUSE HE ALWAYS
12 DID LIKE TO BE THE LEADER. AND HE JUST TALKED ABOUT THE
13 THINGS THAT HE DID AT SUMMIT UNIVERSITY, WHAT WAS REQUIRED
14 OF YOU, THE DIFFERENT BOOKS AND THAT WAS ABOUT IT. WE HAD
15 DINNER AND THAT WAS --

16 Q SO THE EVENING WAS A NICE CHURCH SOCIAL WHERE
17 GREGORY TALKED ABOUT HIS EXPERIENCE AT SUMMIT UNIVERSITY?

18 A WELL, IT WAS A MEETING. IT WAS MORE OF A
19 MEETING THAN A SOCIAL I WOULD SAY.

20 Q WERE ALL THESE PEOPLE ALREADY IN THE CHURCH?

21 A NO, NOT ALL OF THEM.

22 Q WHAT WAS THE PURPOSE OF THE MEETING?

23 A WELL, IT WAS TO INTRODUCE, I GUESS, THE
24 TEACHINGS TO THE REST OF THESE PEOPLE, TO CONVINCING THEM THAT
25 THEY SHOULD GO TO SUMMIT UNIVERSITY.

26 Q AND IN THE COURSE OF INTRODUCING THEM TO THE
27 TEACHINGS OF A RELIGIOUS ORGANIZATION, GREGORY MULL TOLD
28 EVERYBODY ABOUT EIGHT OR TEN PEOPLE JUMPING ON HIM?

1 A WELL, HE HAD A -- HE VERY OFTEN WOULD COME UP
2 WITH THINGS LIKE THAT. HE WAS BEING JOSHERD AT AND SO I
3 GUESS HE WOULD JUST --

4 Q MISS WHITEHEAD, WHEN DID YOU START WORKING FOR
5 MARK AND ELIZABETH PROPHET?

6 A I HAVE NEVER STARTED WORKING FOR MARK AND
7 ELIZABETH PROPHET.

8 Q YOU KNEW BOTH OF THEM --

9 A I AM NOT EMPLOYED BY THEM.

10 Q NOT AT THE PRESENT TIME.

11 AFTER YOU FIRST BECAME A MEMBER OF SUMMIT
12 LIGHTHOUSE AND THEN CHURCH UNIVERSAL AND TRIUMPHANT, DID YOU
13 FUNCTION IN SOME CAPACITY FOR THE BENEFIT OF MISS ELIZABETH
14 CLARE PROPHET?

15 A I THINK I WAS FUNCTIONING FOR MY OWN GOD
16 GIVING -- GIVEN RIGHTS OF THE -- MY BELIEFS, MY BELIEF
17 SYSTEM.

18 Q WHEN DID YOU ACTUALLY GET INVOLVED WITH
19 ELIZABETH CLARE PROPHET AND CHURCH UNIVERSAL AND TRIUMPHANT?

20 MR. KLEIN: I AM GOING TO OBJECT AS TO VAGUE AND
21 AMBIGUOUS BY THE WORD "INVOLVED," YOUR HONOR.

22 THE COURT: PLEASE REPHRASE IT.

23 Q BY MR. LEVY: WHEN DID YOU BECOME A MEMBER OF
24 THE CHURCH?

25 A I AM NOT SURE EXACTLY, BUT I BELIEVE IT WAS IN
26 1975. I WAS INTERESTED IN 1974, LATE 1974, AND THEN I THINK
27 I BECAME A MEMBER PROBABLY IN '75.

28 Q DID YOU ATTEND A QUARTER AT SUMMIT UNIVERSITY?

1 A YES, I DID.

2 Q AFTER YOU ATTENDED THE QUARTER AT SUMMIT
3 UNIVERSITY, DID YOU BECOME A COMMUNITY MEMBER?

4 A NO. I HAD BECOME A MEMBER OF THE CHURCH BEFORE
5 I ATTENDED SUMMIT UNIVERSITY.

6 Q DID YOU EVER BECOME A STAFF MEMBER OF THE
7 CHURCH?

8 A NO.

9 Q DID YOU EVER BECOME PART OF PERMANENT STAFF?

10 A NO.

11 Q WHAT DID THEY TEACH YOU WHEN YOU WENT TO SUMMIT
12 UNIVERSITY?

13 A A LOT ABOUT GOD.

14 Q CAN YOU TELL US ANYTHING IN PARTICULAR THAT
15 THEY TAUGHT YOU?

16 A THE TRUE TEACHINGS OF CHRIST.

17 Q THEY TEACH YOU ABOUT THE ASCENDED MASTERS?

18 A WELL, THAT IS PART OF GOD AS FAR AS I AM
19 CONCERNED.

20 Q DID THEY TEACH YOU THAT ELIZABETH CLARE PROPHET
21 WAS THE ONLY MESSENGER ON THE FACE OF THE EARTH?

22 A NO, THEY DID NOT.

23 Q DID THEY TEACH YOU THAT MARK HAD ASCENDED AND
24 BECOME LANELLO?

25 A THEY SAID HE HAD MADE HIS ASCENSION.

26 Q DO YOU KNOW WHAT HIS NAME IS NOW THAT HE'S MADE
27 HIS ASCENSION?

28 A I BELIEVE WE CALL HIM LANELLO.

1 Q YOU BELIEVE YOU CALL HIM LANELLO?

2 A NO. WE DO CALL HIM LANELLO.

3 Q YOU EVER HEARD OF ANYBODY CALLING HIM EL MORYA?

4 A YES.

5 Q EVER HEAR ELIZABETH TALK TO HER FOLLOWERS WITH
6 THE VOICE OF EL MORYA?

7 A I THINK YOU NEED TO RESTATE THAT QUESTION. I
8 DIDN'T QUITE UNDERSTAND IT.

9 Q LET ME TRY ANOTHER QUESTION.

10 WHILE YOU WERE AT SUMMIT UNIVERSITY, DID YOU
11 LEARN TO DECREE?

12 A YES.

13 Q NOW, HERE IS ONE THAT YOU CAN HANDLE EASY.

14 IN YOUR OPINION, WHAT IS A DECREE?

15 A A DECREE IS INVOKING THE LIGHT OF GOD INTO YOUR
16 OWN WORLD AND THE WORLD AROUND YOU.

17 Q DID YOU EVER READ A BOOK BY MARK AND ELIZABETH
18 PROPHET CALLED "THE SCIENCE OF THE SPOKEN WORD"?

19 A YES, I HAVE.

20 Q IS THAT ONE OF THE BOOKS THAT IS USED AT SUMMIT
21 UNIVERSITY?

22 A I AM NOT SURE. I WOULD PROBABLY -- TO THE BEST
23 OF MY KNOWLEDGE, I WOULD SAY YES. MANY BOOKS ARE USED.

24 Q INCLUDING SOMETHING LIKE "THE PROTOCOLS OF THE
25 ELDERS OF ZION"?

26 A I HAVE NOT HEARD OF THAT BOOK BEFORE.

27 Q DID YOU EVER SEE THE BOOKS THAT HAVE ALUMINUM
28 FOIL WRAPPED AROUND THEM TO KEEP THE EVIL SPIRITS FROM

1 GETTING OUT AND GETTING ALL OVER YOU?

2 A I HAVE NOT SEEN THOSE.

3 Q NOW, IN THIS BOOK, WHICH IS ONE OF THE BOOKS
4 THAT YOU SAID YOU BELIEVED WAS USED AT SUMMIT UNIVERSITY,
5 ARE YOU AWARE THAT THERE IS A DIFFERENCE BETWEEN A PRAYER
6 AND A DECREE?

7 A YES, I AM.

8 Q WHAT IS THE DIFFERENCE BETWEEN A PRAYER AND A
9 DECREE?

10 A WELL, A PRAYER IS TALKING WITH GOD, AND A
11 DECREE IS A MORE FORMAL PRAYER WHERE YOU ADDRESS GOD IN A
12 MORE FORMAL WAY AND YOU CAN CONTINUE TALKING TO HIM IN A
13 MORE FORMAL FASHION.

14 Q WEREN'T YOU TAUGHT THAT A PRAYER WAS TO ASK AND
15 A DECREE WAS TO DEMAND?

16 A NO, I WAS NOT TAUGHT THAT.

17 Q DID YOU FOLLOW THE CODE OF CONDUCT WHILE YOU
18 WERE AT SUMMIT UNIVERSITY?

19 A YES, I DID.

20 Q DID YOU MAKE NOTES AND STUDY ALL OF THE
21 MATERIAL YOU WERE GIVEN THERE?

22 A MOST OF IT.

23 Q LET ME READ TO YOU MARK AND ELIZABETH PROPHET'S
24 DEFINITION OF A PRAYER. IT IS: (READING.)

25 "A DEVOUT PETITION TO, OR ANY
26 FORM OF SPIRITUAL COMMUNION WITH, GOD OR AN
27 OBJECT OF WORSHIP; A SPIRITUAL COMMUNION
28 WITH GOD OR AN OBJECT OF WORSHIP, AS IN

1 SUPPLICATION, THANKSGIVING, ADORATION, OR
2 CONFESSION; A FORMULA OR SEQUENCE OF WORDS
3 USED IN OR APPOINTED FOR PRAYING: THE
4 LORD'S PRAYER; A PETITION; OR AN ENTREATY."

5 LIKE WHEN YOU ARE IN A JAM AND YOU SAY, "GOD,
6 COME ON AND HELP ME," AND YOU PRAY. YOU PRAY AND YOU ASK
7 FOR SOMETHING, A PRAYER.

8 NOW LET ME READ TO YOU WHAT A DECREE IS.
9 (READING.)

10 "A FOREORDAINING WILL, AN EDICT
11 OR FIAT, A FOREORDAINING OF EVENTS. TO
12 DECREE: VERB, TO DECIDE, TO DECLARE, TO
13 COMMAND TO ENJOIN; TO DETERMINE OR ORDER; TO
14 ORDAIN.

15 "THE DECREE IS THE MOST
16 POWERFUL OF ALL APPLICATIONS TO THE GODHEAD.
17 IT IS THE COMMAND OF THE SON OR DAUGHTER OF
18 GOD MADE IN THE NAME OF THE I AM PRESENCE
19 AND THE CHRIST FOR THE WILL OF THE ALMIGHTY
20 TO COME IN TO MANIFESTATION AS ABOVE, SO
21 BELOW. IT IS THE MEANS WHEREBY THE KINGDOM
22 OF GOD BECOMES A REALITY HERE AND NOW
23 THROUGH THE POWER OF THE SPOKEN WORD. IT
24 MAY BE SHORT OR LONG AND USUALLY IS MARKED
25 BY A FORMAL PREAMBLE AND A CLOSING, OR
26 ACCEPTANCE."

27 WERE YOU NOT TAUGHT AT SUMMIT UNIVERSITY THAT
28 WHEN YOU DECREED, YOU WERE LENDING POWER TO THE THINGS THAT

1 ELIZABETH CLARE PROPHET WANTED TO HAPPEN?

2 A I THINK YOU NEED TO RESTATE THE QUESTION. IT
3 IS KIND OF LONG. I DON'T -- I DON'T KNOW WHAT YOU ARE
4 ASKING, MR. LEVY.

5 Q WELL, LET ME TRY AGAIN FOR YOU, MA'AM.

6 AS LONG AS YOU'VE BEEN A MEMBER OF THE CHURCH,
7 HAS IT NOT BEEN YOUR UNDERSTANDING THAT THE MEMBERS WILL DO
8 OR SAY OR FOLLOW ANY EDICT THAT IS PASSED ON TO YOU BY
9 ELIZABETH CLARE PROPHET AS THE MESSENGER OF THE ASCENDED
10 MASTERS?

11 A YOU ARE ASKING THAT ARE WE TO BE OBEDIENT TO
12 ELIZABETH CLARE PROPHET? IS THAT WHAT YOU ARE ASKING? I AM
13 SORRY, I -- YOUR STATEMENT -- YOUR QUESTION IS TOO LONG.

14 Q OKAY. WELL, LET ME MAKE IT SHORTER.
15 TO BE OBEDIENT TO ELIZABETH.

16 A IT DEPENDS ON WHAT DO YOU MEAN BY "OBEDIENT."

17 Q WELL, THAT WAS YOUR TERM. I THOUGHT MAYBE YOU
18 UNDERSTOOD IT, MA'AM.

19 IF ELIZABETH, SPEAKING FOR EL MORYA OR ANY
20 OTHER ASCENDED MASTER, TELLS THE MEMBERS OF THE CHURCH WHAT
21 IS TO BE DONE, IS IT YOUR UNDERSTANDING OF CHURCH POLICY
22 THAT THE MEMBERS ARE SUPPOSED TO BE OBEDIENT TO THAT
23 DICTATE?

24 A WELL, I DON'T KNOW WHAT YOU ARE REFERRING TO IN
25 PARTICULAR AND ALL. BUT I -- I JUST DON'T UNDERSTAND THE
26 QUESTION, I AM SORRY.

27 MR. LEVY: WELL, I CAN SEE THAT WHAT I AM DOING IS
28 CONFUSING YOU TODAY. SO SINCE IT IS 2:30, I AM GOING TO

1 STOP DOING THAT. THANK YOU VERY MUCH, MA'AM.

2 THE WITNESS: YOU ARE WELCOME.

3

4 REDIRECT EXAMINATION. +

5 BY MR. KLEIN:

6 Q IN THAT -- IN ONE OF MR. LEVY'S QUESTIONS, HE
7 SAID SOMETHING ABOUT PEOPLE PILING ON TOP OF MR. MULL.

8 DID MR. MULL USE THE WORD "PEOPLE PILING ON
9 TOP," OR DID HE DESCRIBE WHAT KIND OF PEOPLE?

10 A HE SAID SEVEN OR EIGHT GUYS.

11 Q SECONDLY, IS WHAT YOU'VE TESTIFIED TO THIS JURY
12 WHAT ACTUALLY HAPPENED AS FAR AS THAT CONVERSATION?

13 A YES.

14 Q DID ELIZABETH CLARE PROPHET TELL YOU TO COME IN
15 HERE AND TESTIFY TO WHAT YOU'VE TESTIFIED?

16 A OH, NO. I HAVEN'T EVEN TALKED TO MOTHER ABOUT
17 THAT.

18 MR. KLEIN: THANK YOU.

19 NO FURTHER QUESTIONS.

20 MR. LEVY: JUST ONE MORE.

21

22 RECROSS-EXAMINATION +

23 BY MR. LEVY:

24 Q DID YOU TALK TO MR. KLEIN ABOUT WHAT YOUR
25 TESTIMONY WOULD ENCOMPASS?

26 A OH, YES. WE TALKED -- I'VE TALKED TO MR.
27 KLEIN.

28 Q AND IN ALL THE TIME THE TRIAL HAS BEEN GOING

1 ON, YOU DIDN'T TALK TO ELIZABETH OR ED FRANCIS OR ANYONE
2 ELSE IN THE CHURCH?

3 A I SAID "HELLO" TO MOTHER.

4 MR. LEVY: THAT WAS NICE OF YOU.

5 I HAVE NOTHING FURTHER, YOUR HONOR.

6 THE COURT: ALL RIGHT. YOU ARE EXCUSED.

7 WE ARE GOING TO STOP A BIT EARLY TODAY. I HAVE
8 TO GO TO THE DENTIST AND THIS IS THE ONLY TIME HE COULD SEE
9 ME. I WISH IT WERE A LESS INCONVENIENT TIME, BUT THIS IS
10 THE WAY THE SCHEDULE TURNED OUT.

11 WE WILL RESUME TOMORROW MORNING. WE WILL
12 RESUME AT 9:15. EVERYBODY BE HERE READY TO PROCEED THEN.
13 HAVE A PLEASANT EVENING. REMEMBER THE COURT'S ADMONITIONS.

14 (AT 2:40 P.M., AN ADJOURNMENT WAS TAKEN
15 UNTIL TUESDAY, MARCH 11, 1986, AT
16 9:15 A.M.)
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1 LOS ANGELES, CALIFORNIA; TUESDAY, MARCH 11, 1986 *

2 9:25 P.M.

3 DEPARTMENT 50

HON. ALFRED L. MARGOLIS, JUDGE

4 (APPEARANCES AS HERETOFORE NOTED.)

5
6 (THE FOLLOWING PROCEEDINGS WERE HELD IN
7 CHAMBERS:)

8 THE COURT: YOU WANT TO BE HEARD?

9 MR. KLEIN: YES, YOUR HONOR.

10 THE COURT: GO AHEAD.

11 MR. KLEIN: YOUR HONOR, YESTERDAY IN HIS
12 CROSS-EXAMINATION OF DR. LEVINE, MR. LEVY ASKED THE QUESTION
13 THAT MADE A REFERENCE TO THE PEOPLE'S TEMPLE AND JONESTOWN.
14 I HAVE THOUGHT ABOUT IT CONSIDERABLY SINCE HE MADE THAT
15 REFERENCE. I BELIEVE THAT IT GROSSLY PREJUDICED THIS JURY
16 TO HEAR THAT COMPARISON OF, IN EFFECT, CHURCH UNIVERSAL AND
17 TRIUMPHANT AND JONESTOWN AND PEOPLE'S TEMPLE.

18 I HAVE THOUGHT ABOUT ANY WAY OF RELIEVING THAT
19 PREJUDICE. I CANNOT THINK OF ANYTHING I CAN DO OR THE COURT
20 CAN INSTRUCT THE JURY AT THIS POINT THAT WOULD TAKE A VERY,
21 VERY POWERFUL IMAGE OUT OF THE JURY'S MIND, WHICH IS THAT
22 THIS CHURCH IS IN SOME WAY SIMILAR TO JONESTOWN AND WHAT
23 HAPPENED TO THE PEOPLE AT JONESTOWN IN SOME WAY HAS SOME
24 RELEVANCE TO THIS CASE.

25 ON THAT BASIS OF THE GROSS PREJUDICE I BELIEVE
26 HAS NOW BEEN PLACED IN THE MINDS OF THIS JURY, I WOULD
27 REQUEST THAT THE COURT DECLARE A MISTRIAL.

28 MR. LEVY: MAY I RESPOND, YOUR HONOR?

1 THE COURT: YES, SIR.

2 MR. LEVY: I WOULD REMIND MR. KLEIN THAT AS EARLY AS
3 THE TIME FOR SELECTION OF A JURY, WE HAD A POTENTIAL JUROR
4 WHO STOOD UP AND SAID HE HAD RELATIVES AT JONESTOWN AND HE
5 LIKENED NEW WAVE RELIGIONS AND JONESTOWN. SO THE JURY HAS
6 BEEN EXPOSED TO THE SPECTER OF JONESTOWN BEFORE.

7 SECONDLY, I WOULD REMIND YOU, MR. KLEIN, THAT
8 YOUR WITNESS WHO TESTIFIED, HE HAD NOT MET WITH ANYONE FROM
9 THE CHURCH YOU REPRESENT EITHER WHO WAS A PRESENT MEMBER OR
10 AN EX-MEMBER. HE KNEW NOTHING FIRSTHAND ABOUT THEM,
11 TESTIFYING IN SUCH A GENERAL WAY AND HIS STATEMENT WAS SO
12 CONCLUSIONARY IN THAT HE TESTIFIED THAT IT WAS HIS BELIEF
13 THAT NO ONE ALIVE WITH A NEW WAVE RELIGION COULD POSSIBLY BE
14 PSYCHOLOGICALLY INJURED.

15 I REMINDED HIM OF THE INCIDENT AT JONESTOWN.
16 AND I ALSO REMIND YOU AT THIS TIME THAT IT LEFT HIM WITHOUT
17 AN ANSWER. HE DID NOT RESPOND TO MY INQUIRY, WHICH LEADS ME
18 TO BELIEVE THAT MAYBE HIS GENERALIZATION WAS OVERSTATED.

19 I DON'T THINK AT ANY TIME DURING THIS TRIAL OUR
20 SIDE OF THE CASE HAS TRIED TO MAKE A COMPARISON AS TO THIS
21 CHURCH AND THE PEOPLE'S TEMPLE. WHAT WE HAVE DONE IS ASKED
22 HYPOTHETICAL QUESTIONS WITH REGARD TO PEOPLE WHO APPARENTLY
23 WOULD PURPORT TO HAVE A GREATER DEGREE OF KNOWLEDGE ABOUT
24 THIS CHURCH THAN THEY IN FACT DO HAVE.

25 I THINK THE MOTION IS UNTIMELY, IT IS OUT OF
26 ORDER. I WOULD -- OF COURSE I AM NOT THE JUDGE AND I AM NOT
27 GOING TO RULE ON IT, BUT I THINK YOUR REACTION IS AN
28 EXCESSIVE REACTION.

1 MR. KLEIN: FOR THE RECORD, YOUR HONOR, I OBJECTED TO
2 THE QUESTION AND THE OBJECTION WAS SUSTAINED IS WHY HE
3 DIDN'T ANSWER IT.

4 THE COURT: I THINK WE HAVE HEARD ENOUGH. I AM GOING
5 TO DENY THE MOTION.

6 THE REFERENCE TO JONESTOWN WAS A VERY SWIFT,
7 MOMENTARY REFERENCE, FIRST OF ALL. IT WAS NOT DISCUSSED --
8 JONESTOWN WAS NOT DISCUSSED EXCEPT THAT IT WAS JUST
9 MENTIONED YESTERDAY.

10 SECONDLY, THE WITNESS EXPRESSED HIMSELF IN SUCH
11 BROAD, BROAD TERMS THAT A QUESTION IN WHICH JONESTOWN WAS
12 MENTIONED OR REFERRED TO WAS TO BE EXPECTED AND DID NOT
13 SURPRISE ME. I DON'T THINK THAT THE JURY HAS BEEN
14 PREJUDICED BY THE MENTION OF JONESTOWN YESTERDAY.

15 I WILL MAKE AN ORDER THAT NOBODY MENTION JIM
16 JONES OR JONESTOWN IN FRONT OF THE JURY WITHOUT FIRST
17 OBTAINING PERMISSION TO DO SO. IF SOMETHING DOES OCCUR THAT
18 CAUSES EITHER SIDE TO WISH TO MAKE REFERENCE TO JONESTOWN,
19 ALL YOU HAVE TO DO IS TO ASK FOR A SHORT MEETING OUTSIDE OF
20 THE PRESENCE OF THE JURY AND I WILL DEAL WITH THE REQUEST AT
21 THAT TIME.

22 BUT WITHOUT SPECIFIC PERMISSION BEING GRANTED,
23 THERE SHALL BE NO MENTION OF JIM JONES OR JONESTOWN IN FRONT
24 OF THE JURY EITHER IN THE EVIDENTIARY PHASE OF THIS TRIAL OR
25 THE ARGUMENT PHASE WITHOUT PERMISSION BEING FIRST OBTAINED.
26 SO I WILL MAKE THAT ORDER AT THIS TIME.

27 I DON'T THINK THE JURY HAS BEEN PREJUDICED.
28 AND GIVEN THE TESTIMONY OF THE WITNESS YESTERDAY, I DON'T

1 THINK THAT THE QUESTION IN WHICH JONESTOWN WAS MENTIONED WAS
2 OUT OF LINE.

3 LET'S GET BACK TO WORK.

4 MR. KLEIN: ONE MORE THING, YOUR HONOR. MY CLIENT,
5 IN SPEAKING TO THEM ABOUT THIS MOTION -- IN TALKING TO ME, I
6 TOLD THEM IT MIGHT BE DENIED -- ALSO SUGGESTED IF IT WERE
7 DENIED, ASKING, AND I MAKE THIS REQUEST, THAT THERE BE AN
8 ON-SITE INSPECTION OF CAMELOT BY THE JURY AS A POSSIBLE WAY
9 OF REMOVING COMPARISON THE POWERFUL IMAGE OF COMPARING
10 CAMELOT TO JONESTOWN.

11 THE COURT: THAT IS A POSSIBILITY. LET ME MENTION A
12 COUPLE OF THINGS. IF WE ARE TO DO THAT, IT WOULD TAKE TIME
13 AND WE ARE ALL CONCERNED ABOUT THE LENGTH OF TIME IN GETTING
14 THE CASE TO THE JURY BEFORE TOO MANY OF THE JURORS HAVE TO
15 LEAVE US. BUT THAT IS JUST AN ADMINISTRATIVE CONCERN.

16 GIVE SOME THOUGHT AND TALK AMONG YOURSELVES
17 CONCERNING THE FOLLOWING: ONE, THE ARRANGING OF A BUS TO
18 TAKE US OUT AND BRING US BACK. TWO, WE WILL HAVE TO HAVE
19 SOME ARRANGEMENTS FOR LUNCH I ASSUME BECAUSE --

20 MR. KLEIN: THEY HAVE FACILITIES FOR THAT.

21 THE COURT: -- THE TRIP WILL TAKE THAT LONG.

22 WELL, I DON'T KNOW IF WE SHOULD BE GUESTS
23 THERE. I HAVE A CONCERN ABOUT THAT. MAYBE WE SHOULD STOP
24 AT SOME OTHER PLACE FOR LUNCH. I AM OBVIOUSLY HESITANT
25 ABOUT THE POSSIBILITY OF OUR BEING GUESTS.

26 NEXT, YOU ALL SHOULD DISCUSS BEFORE WE TALK
27 ABOUT THIS ANY FURTHER, BEFORE I TALK ABOUT IT ANY FURTHER
28 AT LEAST, YOU SHOULD DISCUSS JUST WHAT THE ITINERARY AND

1 AGENDA SHALL BE SO THAT THERE IS NO CONFUSION OR
2 DISAGREEMENT THERE SAYING WELL WE SHOULD GO HERE, WE
3 SHOULDN'T GO HERE, WE SHOULD TALK WITH THESE PEOPLE, WE
4 SHOULD NOT TALK WITH THESE PEOPLE, WHATEVER.

5 I THINK THAT THERE SHOULD BE A CLEAR
6 UNDERSTANDING AMONG YOURSELVES AND THEN WITH ME AS TO JUST
7 WHAT THE HECK WE ARE GOING TO DO ONCE THE BUS BRINGS US ONTO
8 THE PREMISES OF CAMELOT SO THAT THERE IS NO BIG HASSLE AT
9 THAT TIME AND PEOPLE WOULD BE CONFUSED OR ANGRY OR
10 DISAPPOINTED OR WORSE.

11 MR. LEVY: MAY I COMMENT, YOUR HONOR?

12 THE COURT: YES.

13 MR. LEVY: JUST BRIEFLY. IT IS NOW ALMOST SIX YEARS
14 SINCE MR. MULL WAS THERE. FOR US TO VISIT THERE NOW WHERE
15 VEGETATION HAS HAD AN OPPORTUNITY TO GROW, WHERE THEY HAVE
16 HAD AN OPPORTUNITY TO REFURBISH AND CHANGE AND BUILD AND DO
17 THESE THINGS AND EVENTUALLY GET PERMITS FOR THINGS THAT WERE
18 CONSTRUCTED WITHOUT PERMITS, TO GO AND SEE -- IS LIKE, YOU
19 KNOW, TO GO TO AUSCHWITZ NOW AFTER THE PLACE HAS BEEN
20 REDECORATED. THERE ARE NO MORE BUNKERS --

21 THE COURT: I HAVEN'T BEEN THERE, BUT I UNDERSTAND IT
22 IS STILL QUITE GRIM.

23 MR. LEVY: BY THE SAME TOKEN, WE ARE SIX YEARS DOWN
24 THE ROAD FROM WHEN MR. MULL WAS THERE.

25 THE COURT: THIS IS SOMETHING WE CAN TALK ABOUT AT A
26 DIFFERENT TIME. YOU ARE NOT HEARING ME.

27 MR. LEVY: YES, I AM HEARING YOU. I AM JUST LETTING
28 YOU KNOW I AM OPPOSED TO THE VISIT. BUT I DO HEAR YOU, BUT

1 I WILL DISCUSS IT WITH THIS GUY.

2 THE COURT: LET ME RESPOND VERY QUICKLY. I DON'T
3 WANT TO KEEP THE JURY WAITING ANY LONGER. WE ARE GOING TO
4 LOSE THE JURY IF WE ARE NOT CAREFUL.

5 THE CONCERNS THAT YOU HAVE MIGHT BE DEALT WITH
6 BY ASKING QUESTIONS OF CERTAIN PEOPLE AND GETTING ANSWERS,
7 TAKING SOME TESTIMONY CONCERNING THE PROPERTY. WE CAN DO
8 THAT WHILE THERE. WE WILL HAVE OUR REPORTER WITH US, WHO
9 WILL HAVE HER MACHINE AND SHE WILL BE PREPARED TO TAKE
10 TESTIMONY.

11 YOU CAN HAVE SOMEBODY TESTIFY AS TO WHEN THIS
12 BUILDING WAS CONSTRUCTED, OR WHAT THE CONDITION WAS SIX
13 YEARS AGO OR WHATEVER. MAYBE THERE ARE PHOTOGRAPHS AROUND
14 THAT CAN BE UTILIZED TO CONTRAST THE APPEARANCE TODAY WITH
15 THAT OF SOME SIX YEARS AGO.

16 NOW, BY SAYING THIS, I AM NOT PROMISING THAT WE
17 ARE GOING TO GO THERE. AND I WANT TO MAKE THAT CLEAR SO
18 THAT I AM NOT MISUNDERSTOOD. I AM OPEN-MINDED ABOUT GOING
19 THERE. BUT I SHOULD NOT BE UNDERSTOOD TO BE COMMITTED TO
20 OUR TAKING A DAY TO GO THERE.

21 MR. LEVY: LYNN HAS ALREADY GOT HER LUNCH PACKED.

22 THE COURT: I ALSO WANT TO DISCUSS WITH YOU FURTHER
23 AT A MORE CONVENIENT TIME -- THE NEXT COUPLE OF DAYS, THIS
24 SHOULD BE DISCUSSED THIS WEEK IF WE ARE GOING TO DO IT AT
25 ALL -- I WANT TO DISCUSS WITH YOU JUST WHAT THE VALUE IS.
26 WHY IS IT WORTHWHILE TAKING A DAY TO GO THERE BECAUSE IT IS
27 A WHOLE DAY. I AM NOT COMMITTED TO GOING. I AM OPEN-MINDED
28 ABOUT IT, HOWEVER, AT THIS POINT.

1 MR. KLEIN: THANK YOU.

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

4 THE COURT: GOOD MORNING.

5 PLEASE PROCEED.

6 MR. KLEIN: I WILL CALL MR. MONROE SHEARER, YOUR
7 HONOR.

8
9 MONROE JULIUS SHEARER, III, +
10 A CROSS-DEFENDANT HEREIN, CALLED AS A WITNESS ON HIS OWN
11 BEHALF, HAVING BEEN FIRST DULY SWORN, TESTIFIES AS FOLLOWS:

12 THE CLERK: PLEASE BE SEATED. PLEASE STATE YOUR NAME
13 FOR THE RECORD AND PLEASE SPELL YOUR NAME.

14 THE WITNESS: MONROE JULIUS SHEARER THE THIRD.
15 M-O-N-R-O-E, J-U-L-I-U-S, S-H-E-A-R-E-R.

16 THE CLERK: THANK YOU.

17 THE COURT: PROCEED.

18 MR. KLEIN: THANK YOU, YOUR HONOR.

19

20 DIRECT EXAMINATION +

21 BY MR. KLEIN:

22 Q MR. SHEARER, WOULD YOU PLEASE GIVE US YOUR
23 EDUCATIONAL BACKGROUND?

24 A YES. I WENT TO THE UNIVERSITY OF MARYLAND IN
25 COLLEGE PARK, MARYLAND, FOR THREE AND A HALF YEARS.

26 Q DID YOU RECEIVE A DEGREE?

27 A NO, I DID NOT.

28 Q WHAT WAS YOUR MAJOR?

1 A HISTORY.

2 Q ARE YOU CURRENTLY A MEMBER OF CHURCH UNIVERSAL
3 AND TRIUMPHANT?

4 A I AM NOT A MEMBER, NO.

5 Q ARE YOU AFFILIATED WITH CHURCH UNIVERSAL AND
6 TRIUMPHANT IN ANY WAY?

7 A I AM ON THE MAILING LIST.

8 Q ARE YOU CURRENTLY EMPLOYED?

9 A YES, I AM.

10 Q FOR WHOM ARE YOU EMPLOYED?

11 A LINDSAY AND ASSOCIATES, INCORPORATED.

12 Q WHAT IS THE BUSINESS OF LINDSAY AND ASSOCIATES?

13 A PRIMARILY THEY ARE IN THE BUSINESS OF SELLING
14 AND INSTALLING AND ADMINISTERING PENSION PLANS TO SMALL
15 BUSINESS OWNERS.

16 Q DO YOU HAVE A TITLE?

17 A I AM A VICE PRESIDENT.

18 Q AND IN GENERAL WHAT ARE YOUR DUTIES THERE?

19 A I ASSIST IN THE PREPARATION IN THE PROPOSALS
20 FOR NEW CLIENTS AND ALSO THE ADMINISTRATION OF THE PLANS
21 ONCE THEY HAVE BEEN INSTALLED.

22 Q HOW LONG HAVE YOU BEEN EMPLOYED BY LINDSAY AND
23 ASSOCIATES?

24 A FOUR YEARS.

25 Q IS LINDSAY AND ASSOCIATES IN ANY WAY CONNECTED
26 TO CHURCH UNIVERSAL AND TRIUMPHANT?

27 A NO, IT'S NOT.

28 Q NOW, PRIOR TO BEING EMPLOYED BY LINDSAY AND

1 ASSOCIATES, WERE YOU A STAFF MEMBER AT CHURCH UNIVERSAL AND
2 TRIUMPHANT?

3 A YES, I WAS.

4 Q HOW MANY YEARS WERE YOU A STAFF MEMBER?

5 A ABOUT 12 YEARS.

6 Q AND WHEN DID YOU CEASE BEING A STAFF MEMBER OF
7 CHURCH UNIVERSAL?

8 A MAY OF 1981.

9 Q WHY DID YOU LEAVE AT THAT TIME?

10 A I FELT THAT THERE WERE OTHER THINGS I NEEDED TO
11 DO WITH MY LIFE, THERE WERE OTHER THINGS I WANTED TO BECOME
12 INVOLVED IN.

13 Q WHEN YOU DECIDED TO LEAVE, DID ANYONE DO OR SAY
14 ANYTHING TO PREVENT YOU FROM LEAVING?

15 A NO.

16 Q ONCE YOU LEFT, DID ANYBODY INTIMIDATE OR HARASS
17 YOU IN ANY WAY?

18 A NO, THEY DIDN'T.

19 Q DID ANYBODY SUGGEST TO YOU THAT THE ONLY WAY
20 YOU COULD MAKE YOUR ASCENSION WAS THROUGH CHURCH UNIVERSAL
21 AND TRIUMPHANT?

22 A NO, THERE WAS NO SUCH SUGGESTION.

23 Q NOW, AT THE TIME YOU LEFT IN MAY OF 1981, WHAT,
24 IF ANY, TITLES OR JOBS DID YOU HAVE AT CHURCH UNIVERSAL AND
25 TRIUMPHANT?

26 A I WAS A MEMBER OF THE BOARD OF DIRECTORS OF THE
27 CHURCH, I WAS A VICE PRESIDENT OF THE CHURCH, I WAS DEAN OF
28 STUDENTS OF SUMMIT UNIVERSITY, HEADMASTER OF MONTESSORI

1 INTERNATIONAL AND I WAS ARCHBISHOP OF THE NEW JERUSALEM.

2 Q WHAT DOES THE ARCHBISHOP OF THE NEW JERUSALEM
3 MEAN?

4 A THAT IS A TITLE, SPIRITUAL TITLE AS BEING IN
5 CHARGE OF THE COMMUNITY OF THE CHURCH BELIEVERS IN THE
6 GREATER LOS ANGELES AREA.

7 Q HOW LONG HAD YOU BEEN A VICE PRESIDENT OF THE
8 CHURCH?

9 A OH, ABOUT FOUR AND A HALF YEARS, SOMETHING LIKE
10 THAT.

11 Q HOW LONG HAD YOU BEEN DEAN OF STUDENTS OF
12 SUMMIT UNIVERSITY?

13 A SIX OR SEVEN YEARS.

14 Q WHAT WERE YOUR DUTIES AS DEAN OF STUDENTS OF
15 SUMMIT UNIVERSITY?

16 A MY DUTIES WERE PRIMARILY ADMINISTRATIVE. I
17 WOULD HELP IN THE SECURING OF THE LIVING FACILITIES FOR THE
18 STUDENTS. I WOULD BE INVOLVED IN THEIR TRANSPORTATION. I
19 WOULD ALSO REVIEW THE APPLICANTS FOR SCHOOL AND ASSIST IN
20 THE PROCESSING OF THOSE APPLICATIONS.

21 Q HOW LONG HAD YOU BEEN HEADMASTER OF MONTESSORI
22 INTERNATIONAL?

23 A ACTUALLY IT WAS A VERY SHORT PERIOD OF TIME
24 RIGHT BEFORE I LEFT. I REALLY DIDN'T FUNCTION MUCH IN THAT
25 ROLE OTHER THAN TO MEET WITH THE TEACHERS FROM TIME TO TIME.

26 Q HOW LONG WERE YOU A MEMBER OF THE BOARD OF
27 DIRECTORS?

28 A ABOUT SIX YEARS.

1 Q WHILE YOU WERE STAFF MEMBER AT CHURCH UNIVERSAL
2 AND TRIUMPHANT, DID YOU HAVE OCCASION TO KNOW MR. GREGORY
3 MULL?

4 A YES, I DID.

5 Q DID THERE COME A TIME WHEN THERE WAS A
6 COMMUNICATION WITH MR. MULL WITH RESPECT TO HIM PERFORMING
7 ARCHITECTURAL SERVICES FOR THE CHURCH?

8 A YES.

9 Q WHEN WAS THE FIRST SUCH COMMUNICATION?

10 A IN EARLY 1978, WE RECEIVED THE PROPOSAL FROM
11 HIM SUGGESTING THAT HE DO A CATHEDRAL FOR THE NEW CAMELOT
12 PROPERTY.

13 Q TO YOUR KNOWLEDGE, HAD HE BEEN INVITED BY
14 CHURCH OFFICIALS TO MAKE SUCH A PROPOSAL?

15 A NO, HE HAD NOT.

16 Q WAS THE PROPOSAL ACCEPTED?

17 A NO, IT WAS NOT.

18 Q DID THERE COME A TIME WHEN THERE WAS ANOTHER
19 DISCUSSION WITH MR. MULL ABOUT PERFORMING ARCHITECTURAL
20 SERVICES FOR THE CHURCH?

21 A YES. IT WAS ABOUT DECEMBER OF 1978.

22 Q WHAT WAS THE NATURE OF THAT COMMUNICATION? WAS
23 IT A PHONE CALL, LETTER?

24 A I TELEPHONED GREGORY WHILE HE WAS LIVING IN SAN
25 FRANCISCO.

26 Q AS BEST YOU CAN RECALL, TELL US WHAT YOU SAID
27 AND WHAT HE SAID DURING THAT PHONE CONVERSATION.

28 A I CALLED GREGORY ON THE PHONE AND SAID THAT WE

1 WOULD BE VERY INTERESTED IN HAVING HIM COME DOWN AND DO
2 ARCHITECTURAL WORK AT CAMELOT. AND I ASKED HIM IF HE WOULD
3 BE INTERESTED IN DOING THAT.

4 HE SAID HE WOULD BE. HE WOULD LIKE TO DO THAT.

5 I SAID, "WELL, YOU KNOW, I AM CALLING TO GATHER
6 THE FACTS ABOUT THIS SITUATION. I THOUGHT I'D LET YOU KNOW
7 THAT THE BOARD WOULD BE WILLING TO FURNISH YOU WITH FREE
8 ROOM AND BOARD FOR THE TIME THAT YOU ARE ON OUR CAMPUS AS
9 WELL AS PAY FOR YOUR TRANSPORTATION BACK AND FORTH TO SAN
10 FRANCISCO WHILE YOU WERE THERE -- WHILE YOU ARE HELPING US
11 AT CAMELOT."

12 HE SAID THAT HE'D VERY MUCH BE INTERESTED IN
13 COMING, BUT HE COULD ONLY COME IF HIS EXPENSES WOULD BE MET.

14 SO I SAID, "WELL, HOW MUCH ARE YOUR EXPENSES?"

15 AND HE SAID HE COULDN'T JUST SAY AT THE MOMENT.
16 HE'D HAVE TO REALLY SIT DOWN AND FIGURE THE WHOLE THING OUT.

17 AND I SAID, "WELL, WHAT ARE WE GOING TO DO?
18 HOW LONG DO YOU THINK THIS WILL TAKE? DO YOU HAVE ANY
19 METHODS WHEREBY YOU WOULD BE ABLE TO MEET YOUR EXPENSES?"

20 AND HE TOLD ME ABOUT A COMBINATION OF THINGS
21 THAT HE THOUGHT MIGHT TOGETHER MEET HIS EXPENSES. FIRST OF
22 ALL, HE MENTIONED HE WAS IN THE PROCESS OF TRYING TO GET A
23 NEW LOAN ON HIS HOUSE THAT WOULD MEET HIS EXPENSES FOR A
24 PERIOD OF TIME.

25 HE ALSO SAID THAT HE HAD EXISTING CLIENTS WHO
26 STILL OWED HIM CONSIDERABLE SUM OF MONEY FOR WORK HE HAD
27 ALREADY DONE FOR THEM. IF HE COULD JUST GET THEM TO PAY
28 HIM, THAT WOULD GO A LONG WAY TOWARDS MEETING HIS EXPENSES.

1 HE ALSO SAID HE HAD ANY NUMBER OF JOBS THAT HE
2 WAS WORKING ON AT THE CURRENT TIME THAT HE WAS OBLIGED TO
3 FINISH EVEN IF HE WAS HELPING US AT CAMELOT AND THAT WOULD
4 ALSO PROVIDE HIM HELP.

5 I ASKED HIM HOW LONG HE THOUGHT IT WOULD TAKE
6 HIM TO FIGURE ALL OF THIS OUT, WHAT TIME FRAME WERE WE
7 DISCUSSING.

8 AND HE SAID WELL, OF COURSE WE WERE INTERESTED
9 IN HAVING HIM COME AS SOON AS IT WAS POSSIBLE AND OF COURSE
10 HE WAS INTERESTED IN COMING. SO HE SUGGESTED THAT -- IT WAS
11 EITHER IN THAT CONVERSATION OR CONVERSATION -- THE FOLLOW-UP
12 CALL A FEW DAYS LATER WHERE HE SAID THAT PERHAPS HE COULD
13 COME DOWN SOONER, AS SOON AS POSSIBLE.

14 AND HE HAD BEEN THINKING ABOUT SELLING HIS
15 HOUSE. AND IF HE CAME UP SHORT FROM ANY OF THOSE OTHER
16 METHODS, MAYBE THE CHURCH COULD LOAN HIM THE MONEY AND HE'D
17 REPAY THE CHURCH UPON THE SALE OF HIS HOUSE.

18 Q AT THE CONCLUSION OF THOSE PHONE CONVERSATIONS,
19 EITHER ONE OR TWO AS YOU JUST MENTIONED, AS FAR AS YOU WERE
20 CONCERNED, WHAT, IF ANY, ISSUES HAD YET TO BE RESOLVED WITH
21 RESPECT TO THE FINANCIAL ARRANGEMENTS?

22 A WELL, WE STILL HAD TO FIND OUT HOW MUCH GREGORY
23 WAS GOING TO OWE ABOVE AND BEYOND WHAT HIS OTHER EXPENSES
24 WERE GOING TO BE, IF ANYTHING, THAT HE WAS -- FROM THE
25 SOURCES OF INCOME THAT HE WAS GOING TO GET.

26 AND I, OF COURSE, HAD TO GET BACK TO THE BOARD
27 TO SEE IF THEY WERE AMENABLE TO THIS CONCEPT OF ADVANCING
28 HIM FUNDS WITH THE UNDERSTANDING THAT HE WAS GOING TO REPAY

1 THEM UPON THE SALE OF HIS HOUSE.

2 Q HAD IT BEEN DETERMINED AFTER THESE TWO PHONE
3 CONVERSATIONS WHETHER HE WOULD WORK FULL OR PART-TIME?

4 A THAT WAS ALSO PART OF THE EQUATION AS TO HOW
5 MUCH TIME HE WOULD BE ABLE TO GIVE AND STILL MEET HIS
6 OBLIGATIONS.

7 Q DID YOU HAVE ANY OTHER CONVERSATIONS WITH MR.
8 MULL BEFORE HE ACTUALLY CAME TO LIVE AT CAMELOT?

9 A NOT THAT I RECALL.

10 Q DID THERE COME A TIME WHEN HE DID BEGIN LIVING
11 AND WORKING AT CAMELOT?

12 A YES, HE DID.

13 Q DO YOU RECALL WHEN THAT WAS?

14 A AS -- I THINK IT WAS MID-JANUARY, 1979.

15 Q WAS ANY PARTICULAR CHURCH OFFICIAL GIVEN THE
16 RESPONSIBILITY FOR DEALING WITH MR. MULL WITH RESPECT TO THE
17 FINANCIAL ARRANGEMENTS BETWEEN HIM AND THE CHURCH AFTER HE
18 CAME TO CAMELOT?

19 A YES. THAT WAS MY JOB.

20 Q AS OF JANUARY OF 1979, WHEN MR. MULL CAME TO
21 LIVE AND WORK AT CAMELOT, HAD YOU REACHED THE FINAL
22 AGREEMENT WITH HIM AS TO THE FINANCIAL ARRANGEMENTS BETWEEN
23 HIM AND THE CHURCH?

24 A NO.

25 Q WHAT HAD TO BE WORKED OUT AS OF THAT TIME?

26 A BASICALLY THE SAME THINGS THAT I HAD ALREADY
27 MENTIONED. WE STILL HAD TO DISCUSS WHETHER HE WAS GOING TO
28 HAVE ANY OVERAGE ABOVE AND BEYOND WHAT HIS INCOME VERSUS

1 EXPENSES WAS, AND THEN WE HAD TO DISCUSS HOW MUCH AND HOW
2 LONG WE WOULD LOAN HIM FUNDS IN EXCHANGE FOR THE REPAYMENT
3 UPON THE SALE OF HIS HOUSE.

4 Q TO YOUR KNOWLEDGE, DID ANY OTHER CHURCH
5 OFFICIALS HAVE DISCUSSIONS IN JANUARY OF 1979 WITH MR. MULL
6 WITH RESPECT TO THESE FINANCIAL ARRANGEMENTS?

7 A NO.

8 Q WHY DID YOU ALLOW MR. MULL TO COME TO CAMELOT
9 WITHOUT FINALIZING THOSE FINANCIAL ARRANGEMENTS?

10 A WELL, WE VERY MUCH WANTED HIM TO COME AND HE
11 WAS ALSO DESIROUS OF COMING. AND I DIDN'T HAVE ANY REASON
12 TO THINK THAT WE WOULDN'T BE ABLE TO WORK THINGS OUT.

13 Q SUBSEQUENT TO THE DATE IN JANUARY OF 1979 WHEN
14 MR. MULL CAME TO LIVE AT CAMELOT, WAS THERE ANY
15 COMMUNICATION BETWEEN MR. MULL AND CHURCH OFFICIALS WITH
16 RESPECT TO THOSE FINANCIAL ARRANGEMENTS?

17 A YES, THERE WAS. THE FIRST THING THAT I RECALL
18 WAS ABOUT THE TIME OF THE SECOND PAYMENT TO GREGORY. I HAD
19 RECEIVED A REQUEST FROM HIM, I BELIEVE, FOR WELL OVER
20 \$4,000.

21 AND SO I SPOKE WITH HIM AND SAID, "GREGORY, I
22 HOPE YOU REALIZE THAT PEOPLE ON STAFF ARE NOT PAID THOSE
23 KINDS OF SUMS, EITHER AS SALARY OR AS ANY KIND OF LOAN OR
24 ANYTHING, AND I DON'T UNDERSTAND HOW YOU WOULD EXPECT TO BE
25 PAID THAT AMOUNT OF MONEY."

26 HE WENT ON TO SAY THAT HE WAS VERY FIRM ABOUT
27 PLANNING TO SELL HIS HOUSE. AND IF WE WOULD GO AHEAD AND
28 LOAN HIM THOSE FUNDS, HE WAS SURE THAT HE'D BE IN A POSITION

1 TO PAY US BACK. AND HE ALSO IMPLIED THAT THAT WOULD BE
2 TAKING PLACE IN THE IMMEDIATE -- VERY FORESEEABLE FUTURE.

3 Q DID THERE COME A POINT IN TIME WHEN THE CHURCH
4 DID FINALIZE THE FINANCIAL ARRANGEMENTS WITH MR. MULL?

5 A YES, THERE DID.

6 Q AND AT WHAT POINT IN TIME DID THAT OCCUR?

7 A MID-MARCH OF '79.

8 Q WHAT WAS THE FINAL AGREEMENT BETWEEN THE CHURCH
9 AND MR. MULL AS FAR AS YOU UNDERSTOOD IT?

10 A THE FINAL AGREEMENT WAS THAT THE CHURCH WOULD
11 LOAN HIM FUNDS TO MEET WHATEVER EXPENSES HE COULD NOT MEET
12 ON HIS OWN AND WITH THE UNDERSTANDING THAT HE WOULD REPAY
13 WHATEVER AMOUNTS WE LOANED HIM UPON THE SALE OF HIS HOUSE.

14 AND THAT IN THE MEANTIME, WE WOULD GIVE HIM
15 FREE ROOM AND BOARD WHILE HE SERVED ON OUR CAMPUS AND WE
16 WOULD ALSO GIVE HIM THE AIR FARE THAT HE NEEDED TO GO BACK
17 AND FORTH TO SAN FRANCISCO.

18 AND WE ALSO STIPULATED THAT IF WE WERE GOING TO
19 DO THIS, THAT HE SHOULD PUT HIS HOUSE ON THE MARKET RIGHT
20 AWAY SO THAT WE WOULDN'T HAVE TO KEEP DOING THIS ANY LONGER
21 THAN NECESSARY.

22 Q DID MR. MULL AGREE TO THAT ARRANGEMENT?

23 A YES, HE DID.

24 Q THERE ARE SOME LETTERS IN EVIDENCE WHERE MR.
25 MULL REFERS TO MONEY GIVEN TO HIM BY THE CHURCH AS LOANS.
26 IN HIS TESTIMONY, MR. MULL SAID THAT THE WORD "LOAN" WAS
27 USED BY HIM BECAUSE YOU REQUESTED THAT HE USE THAT TERM AND
28 HE WAS DOING A FAVOR FOR YOU.

1 DID YOU EVER REQUEST THAT MR. MULL USE THE WORD
2 "LOANS" IN ANY LETTERS THAT HE WROTE TO THE CHURCH?

3 MR. LEVY: YOUR HONOR, I AM GOING TO OBJECT AT THIS
4 POINT. I THINK THE TESTIMONY HAS BEEN MISCHARACTERIZED.

5 THE COURT: PLEASE REPHRASE YOUR QUESTION.

6 Q BY MR. KLEIN: DID YOU EVER REQUEST THAT MR.
7 MULL, IN WRITING LETTERS TO EITHER YOU OR OTHER CHURCH
8 OFFICIALS, REFER TO THE MONEY GIVEN TO HIM BY THE CHURCH AS
9 LOANS? DID YOU EVER MAKE THAT REQUEST OF HIM?

10 A I NEVER MADE ANY SUCH REQUEST.

11 Q NOW, WERE YOU PRESENT AT THE JUNE 6, 1980,
12 MEETING WHERE MR. MULL, ELIZABETH CLARE PROPHET AND ED
13 FRANCIS WERE PRESENT?

14 A YES, I WAS.

15 Q IS THAT THE MEETING WHERE A TAPE WAS MADE OF
16 THE MEETING?

17 A YES.

18 Q DURING THE COURSE OF THAT MEETING, DID MR. MULL
19 EVER STATE THAT HE HAD USED THE WORD "LOAN" AS A FAVOR TO
20 YOU?

21 A NO.

22 Q WHEN WAS THE FIRST TIME THAT YOU BECAME AWARE
23 THAT MR. MULL HAD MADE SUCH AN ACCUSATION THAT YOU HAD ASKED
24 HIM TO USE THE WORD "LOAN"?

25 A THE FIRST TIME I EVER HEARD THAT WAS AT THIS
26 TRIAL.

27 Q DID YOU EVER ASK MR. MULL TO COME TO CAMELOT ON
28 HIS TERMS?

1 A NO, I DIDN'T.

2 Q ARE YOU CERTAIN OF THAT?

3 A YES, I AM VERY SURE.

4 Q PRIOR TO THE FINALIZATION OF THE FINANCIAL
5 ARRANGEMENTS IN MARCH AS YOU TESTIFIED, DID YOU AUTHORIZE
6 GIVING MR. MULL ANY MONEY?

7 A YES, I DID.

8 Q HOW MUCH DID YOU AUTHORIZE GIVING HIM BEFORE
9 THE FINANCIAL ARRANGEMENTS WERE FINALIZED?

10 A I THINK THERE WERE TWO PAYMENTS TOTALING
11 \$3,400, SOMETHING LIKE THAT.

12 Q WHY DID YOU AUTHORIZE GIVING HIM \$3,400 IF THE
13 FINANCIAL ARRANGEMENTS HAD NOT BEEN FINALIZED?

14 A BECAUSE FROM THE VERY BEGINNING HE SAID THAT
15 WHATEVER PAYMENTS THE CHURCH GAVE HIM, WHATEVER LOANS,
16 MONIES WE GAVE HIM, HE WOULD REPAY THEM ON THE SALE OF HIS
17 HOUSE AND I HAD NO REASON NOT TO TRUST HIS WORD.

18 Q TO YOUR KNOWLEDGE, DID THE CHURCH LEND
19 ADDITIONAL SUMS OF MONEY TO MR. MULL?

20 A YES.

21 Q DO YOU KNOW APPROXIMATELY HOW MUCH WAS LENT IN
22 TOTAL?

23 A I THINK AROUND \$37,000.

24 Q DID THERE COME A TIME WHEN YOU AND MR. MULL
25 WERE PRESENT AND THE SUBJECT OF A PROMISSORY NOTE WAS
26 DISCUSSED?

27 A YES, THERE DID.

28 Q DO YOU RECALL APPROXIMATELY WHEN THAT WAS?

1 A IT WAS IN SEPTEMBER OF 1979.

2 Q DO YOU RECALL WHERE THIS DISCUSSION OCCURRED?

3 A IN EDWARD FRANCIS' OFFICE AT CAMELOT.

4 Q DO YOU RECALL WHO WAS PRESENT?

5 A GREGORY MULL, EDWARD FRANCIS AND MYSELF.

6 Q AS BEST YOU CAN, PLEASE TELL US WHAT WAS SAID
7 AT THAT MEETING.

8 A WELL, BASICALLY EDWARD AND I REVIEWED THE FACT
9 THAT WHEN WE HAD MADE THIS ARRANGEMENT IN THE SPRING, WE HAD
10 ALL ASSUMED THAT THE HOUSE WOULD SELL MUCH MORE QUICKLY.

11 AND SINCE IT HADN'T, THE AMOUNT OF THE LOANS
12 HAD GROWN WELL BEYOND OUR ORIGINAL EXPECTATIONS AND THAT IT
13 REALLY WASN'T PROPER FOR A CHURCH OR ANY OTHER ORGANIZATION
14 TO JUST BE EXTENDING PEOPLE FUNDS WITH NO CLEAR RECORD OF
15 WHAT THOSE FUNDS WERE EARMARKED FOR IN A DOCUMENTED MANNER.

16 AND SO WE FELT THAT IF WE WERE TO CONTINUE WITH
17 THE ARRANGEMENT, WE SHOULD DOCUMENT IT BY WAY OF A NOTE.

18 Q DO YOU RECALL WHAT, IF ANYTHING, MR. MULL SAID
19 ABOUT THAT?

20 A WELL, HIS INITIAL REACTION WAS, "DON'T YOU
21 TRUST ME?"

22 AND WE SAID, "YES, GREGORY, WE DO TRUST YOU.
23 THAT IS NOT THE QUESTION. THE POINT IS THAT WE ARE A
24 CHURCH, AN ORGANIZATION, AND WE SHOULD PROPERLY RECORD WHAT
25 WE ARE DOING."

26 I THINK HE MIGHT HAVE SAID, "WHY DO YOU HAVE TO
27 CHARGE INTEREST ON THE NOTE?"

28 AND EDWARD SAID THAT HE FELT LIKE IT WAS -- YOU

1 SHOULD CHARGE INTEREST TO MAKE IT A BONA FIDE NOTE.

2 Q DURING THAT CONVERSATION WITH YOURSELF, MR.
3 FRANCIS AND MR. MULL, DID MR. MULL AT ANY TIME DISPUTE THE
4 FACT THAT THE MONEY WAS A LOAN THAT HE HAD TO PAY BACK TO
5 THE CHURCH?

6 A NO, HE DIDN'T.

7 Q DURING THAT CONVERSATION, DID EITHER YOU OR MR.
8 FRANCIS YELL AT MR. MULL?

9 A NO, WE DID NOT.

10 Q DID EITHER OF YOU RAISE YOUR VOICE DURING THAT
11 CONVERSATION?

12 A NO. IT WAS A VERY MATTER-OF-FACT CONVERSATION.

13 Q WHEN YOU HAD THE CONVERSATION, HAD THE
14 PROMISSORY NOTE ALREADY BEEN WRITTEN UP AT THAT TIME?

15 A NO, IT HAD NOT.

16 Q DO YOU KNOW IF MR. MULL EVER SIGNED THE
17 PROMISSORY NOTE?

18 A YES.

19 Q WERE YOU PRESENT WHEN HE SIGNED IT?

20 A NO, I WAS NOT PRESENT.

21 Q DURING YOUR ENTIRE DEALINGS WITH MR. MULL,
22 WHAT, IF ANY, PROMISES DID YOU MAKE TO HIM ON BEHALF OF THE
23 CHURCH?

24 A WE PROMISED TO LOAN HIM MONEY SO THAT HE COULD
25 MEET HIS EXPENSES WITH THE UNDERSTANDING THAT HE WOULD REPAY
26 IT WHEN HE GOT HIS HOUSE SOLD. WE PROMISED TO GIVE HIM ROOM
27 AND BOARD FOR THE TIME THAT HE SERVED ON THE CAMPUS AND ALSO
28 TO PAY FOR HIS AIR FARE BACK AND FORTH TO SAN FRANCISCO.

1 Q DID YOU MAKE ANY OTHER PROMISES TO HIM?

2 A NO.

3 Q TO YOUR KNOWLEDGE, DID ANY OTHER CHURCH
4 OFFICIALS MAKE PROMISES TO HIM WITH RESPECT TO THESE
5 FINANCIAL ARRANGEMENTS?

6 A NO.

7 Q DURING THE LATTER PART OF 1978, WERE YOU ON THE
8 EXECUTIVE COMMITTEE OF THE BOARD?

9 A YES, I WAS.

10 Q WHO ELSE WAS ON IT?

11 A JAMES MC CAFFREY AND EDWARD FRANCIS.

12 Q DID THERE COME A TIME WHEN THERE WAS A
13 DISCUSSION WITH RESPECT TO INVITING GREGORY MULL TO COME AND
14 DO ARCHITECTURAL WORK AT CAMELOT?

15 A YES.

16 Q WHEN WAS THAT DISCUSSION?

17 A THAT WAS ALSO AROUND DECEMBER OF 1978.

18 Q DO YOU RECALL WHAT WAS SAID AT THE BOARD
19 MEETING AT THAT TIME ABOUT MR. MULL AND INVITING HIM TO
20 CAMELOT?

21 A I WENT TO THE BOARD AND I SAID, "I'D LIKE TO
22 INVITE GREGORY TO COME DOWN AND DO ARCHITECTURAL WORK FOR US
23 HERE AT CAMELOT."

24 AND THEY SAID, "GO AHEAD AND EXPLORE IT." SO I
25 DID.

26 Q WHY DID YOU BRING UP THE IDEA OF INVITING MR.
27 MULL TO COME AND DO ARCHITECTURAL WORK AT CAMELOT?

28 A WE HAD VARIOUS PROJECTS THAT WE DID NEED WORK

1 ON AND WE THOUGHT IT WOULD BE A GOOD IDEA FOR GREGORY TO DO
2 IT. IT WAS COSTING US A GREAT DEAL OF MONEY TO HAVE OUR
3 OUTSIDE ARCHITECTS DO THAT WORK.

4 Q DID THE EXECUTIVE COMMITTEE HAVE ANY PARTICULAR
5 PROJECTS IN MIND FOR GREGORY MULL TO WORK ON?

6 A YES, WE DID. WE WANTED HIM TO WORK ON THE
7 MONTESSORI SCHOOL BUILDINGS, WILL OF GOD FOCUS AT THE
8 ASHRAM, AND OTHER RENOVATION PROJECTS THAT WE HAD ON THE
9 EXISTING FACILITIES THERE ON THE CAMPUS.

10 Q WAS THERE ANY DISCUSSION AT THAT BOARD MEETING
11 OR ANY BOARD MEETINGS ABOUT WHETHER GREGORY MULL WOULD WORK
12 ON THE TEN-YEAR CAMELOT PLAN?

13 A NO. THAT WAS NOT DISCUSSED.

14 Q TO YOUR KNOWLEDGE, WITH THE EXCEPTION OF THE
15 MONTESSORI INTERNATIONAL THAT YOU MENTIONED, DID MR. MULL
16 WORK ON ANY PROJECTS IN THE TEN-YEAR PLAN?

17 A NO.

18 Q AT THE MEETING OF THE EXECUTIVE COMMITTEE, WAS
19 THERE ANY DISCUSSION AS TO THE FINANCIAL ARRANGEMENTS THAT
20 COULD BE MADE WITH MR. MULL IF HE CAME TO CAMELOT?

21 A YES. WE FELT THAT WE WOULD LIKE TO OFFER HIM
22 FREE ROOM AND BOARD WHILE HE WAS ON OUR CAMPUS AND ALSO TO
23 PAY HIS AIR FARE BACK AND FORTH TO SAN FRANCISCO.

24 Q WAS THERE A TIME WHEN THIS IDEA, THIS DECISION
25 AS FAR AS INVITING MR. MULL TO CAMELOT, WAS DISCUSSED WITH
26 THE FULL BOARD?

27 A NO, NOT THAT I RECALL.

28 Q IN LATE '78 AND THE YEAR 1979, WAS RANDALL KING

1 ON EITHER THE BOARD OR THE EXECUTIVE COMMITTEE?

2 A NO, RANDALL KING WAS NOT ON THE BOARD.

3 Q DID HE EVER ATTEND EXECUTIVE COMMITTEE OR BOARD
4 MEETINGS DURING 1978 OR '79?

5 A YES, HE DID ATTEND THEM.

6 Q AND WHEN WOULD HE ATTEND BOARD OR EXECUTIVE
7 COMMITTEE MEETINGS?

8 A WHEN HE HAD A PROJECT TO PROPOSE OR SOME OTHER
9 BUSINESS TO CONDUCT WITH THE BOARD.

10 Q WHEN -- WAS THAT A NORMAL PROCEDURE, TO ALLOW
11 SOMEBODY TO BE AT A BOARD OR EXECUTIVE COMMITTEE MEETING
12 WHEN THEY HAD A PROJECT TO DISCUSS?

13 A YES. PEOPLE WOULD COME IN, MAKE THEIR
14 PRESENTATION, PROBABLY BE A LITTLE DISCUSSION ABOUT THEIR
15 PRESENTATION AND THEN THEY WOULD BE EXCUSED.

16 Q THAT WAS MY NEXT QUESTION. WHEN SOMEBODY WAS
17 AT A BOARD OR EXECUTIVE COMMITTEE MEETING TO MAKE A
18 PRESENTATION, WOULD THEY REMAIN AT THE MEETING AFTER THEY
19 MADE THEIR PRESENTATION OR BE THERE BEFORE THEY MADE THEIR
20 PRESENTATION?

21 A NO. JUST WHILE WE WERE TALKING ABOUT IT.

22 Q DID RANDALL KING EVER MAKE ANY KINDS OF
23 PRESENTATION WITH RESPECT TO GREGORY MULL?

24 A NO, HE DID NOT.

25 Q DID THERE -- WITHDRAWN.

26 YOU TOLD US THAT THERE WAS A FINAL FINANCIAL
27 AGREEMENT REACHED WITH MR. MULL AROUND MID-MARCH OF 1979.

28 WAS THAT AN AGREEMENT DISCUSSED IN EITHER THE

1 BOARD OR AN EXECUTIVE COMMITTEE MEETING?

2 A YES.

3 Q WHEN WAS IT DISCUSSED?

4 A LATE FEBRUARY AND EARLY MARCH, 1979.

5 Q TO THE BEST OF YOUR RECOLLECTION, WHAT WAS SAID
6 IN THE BOARD MEETING ABOUT WHAT THE FINAL FINANCIAL
7 ARRANGEMENTS WOULD BE WITH MR. MULL?

8 A WELL, WE AGREED THAT WE WOULD TELL GREGORY THAT
9 WE WOULD CONTINUE TO LOAN HIM MONEY AND WITH THE
10 UNDERSTANDING THAT HE WOULD REPAY IT UPON THE SALE OF HIS
11 HOUSE, THAT WE WOULD COMMIT TO DO THIS AT LEAST WHILE THE
12 MONTESSORI PROJECT WAS BEING WORKED ON AND ANY OTHER
13 IMMEDIATE PROJECTS WE HAD IN THE NEAR FUTURE.

14 WE AGREED WE WOULD ALSO TELL HIM, WHICH WE DID,
15 THAT ABOVE AND BEYOND THOSE PROJECTS, HE WOULD HAVE TO BE
16 PREPARED TO SUPPORT HIMSELF FINANCIALLY EITHER IN THE
17 CAMELOT AREA OR IN SAN FRANCISCO. AND THAT IF WE WERE GOING
18 TO GIVE HIM THESE FUNDS, THAT HE SHOULD PUT HIS HOUSE ON THE
19 MARKET RIGHT AWAY.

20 Q PRIOR TO WHEN THE BOARD DISCUSSED THAT IN
21 MARCH, HAD THE BOARD REACHED A FINAL DECISION WITH RESPECT
22 TO THE FINANCIAL ARRANGEMENTS BETWEEN THE CHURCH AND MR.
23 MULL?

24 A NO.

25 Q PRIOR TO WHEN THE BOARD DISCUSSED THAT IN
26 MARCH, HAD YOU EVER STATED OR SUGGESTED TO MR. MULL THAT A
27 FINANCIAL -- THAT A FINALIZED FINANCIAL AGREEMENT EXISTED
28 BETWEEN THE CHURCH AND HIM?

1 A NO. I CONVEYED TO HIM THAT THE EXECUTIVE
2 COMMITTEE WOULD HAVE TO MAKE THAT DECISION.

3 Q I'D LIKE TO DIRECT YOUR ATTENTION TO APRIL OF
4 1981, A DATE WHEN A SQUARE DANCE WAS HELD AT CAMELOT.

5 DID THERE COME A TIME ON THAT DATE THAT YOU
6 ARRIVED AT CAMELOT?

7 A YES.

8 Q WHEN YOU ARRIVED THERE, WAS MR. MULL ALREADY ON
9 THE PROPERTY?

10 A YES, HE WAS.

11 Q WHEN YOU ARRIVED, WHERE WAS MR. MULL?

12 A WITH A GROUP OF PEOPLE SOMEWHERE IN THE GENERAL
13 AREA OF THE GUARDHOUSE.

14 Q WHEN YOU FIRST SAW HIM, WHERE WERE YOU?

15 A DRIVING IN THE DRIVEWAY.

16 Q WHEN YOU DROVE IN, DID YOU SEE MR. FRANCIS?

17 A YES, I DID.

18 Q WHERE WAS HE?

19 A IN THE SAME GROUP OF PEOPLE.

20 Q SAME GROUP AS WHERE MR. MULL WAS?

21 A YES.

22 Q AFTER DRIVING BY THEM, WHAT DID YOU DO?

23 A I DROVE PAST THE GROUP AND PARKED IN THE
24 PARKING LOT.

25 Q HOW FAR WAS IT FROM WHERE YOU PARKED YOUR CAR
26 IN THE PARKING LOT TO WHERE MR. MULL AND MR. FRANCIS WERE?

27 A I'D ESTIMATE AROUND 100 FEET OR SOMETHING LIKE
28 THAT.

1 Q DID YOU EVER GET ANY CLOSER THAN THAT 100 FEET
2 TO WHERE MR. MULL AND MR. FRANCIS WERE DURING THE COURSE OF
3 THEIR CONVERSATION?

4 A NO, I DID NOT.

5 Q CAN YOU TELL US ABOUT HOW MUCH TIME ELAPSED
6 FROM WHEN YOU GOT OUT OF YOUR CAR IN THE PARKING LOT AND MR.
7 MULL LEFT CAMELOT?

8 A TWO -- ABOUT TWO MINUTES.

9 Q DID YOU EVER SAY ANYTHING TO MR. MULL DURING
10 THOSE TWO MINUTES?

11 A NO, I DIDN'T.

12 Q TO YOUR KNOWLEDGE, DID MR. MULL SEE YOU DURING
13 THOSE TWO MINUTES?

14 MR. LEVY: I AM GOING TO OBJECT TO THAT. IT CALLS
15 FOR A CONCLUSION, YOUR HONOR.

16 THE COURT: SUSTAINED.

17 Q BY MR. KLEIN: DURING THE TIME THAT YOU WERE IN
18 THE PARKING LOT, DID YOU EVER OBSERVE MR. MULL TO BE LOOKING
19 IN YOUR DIRECTION TOWARDS YOU?

20 A NO.

21 Q DURING THE TIME THAT YOU WERE IN THE PARKING
22 LOT, DID YOU OBSERVE THE PEOPLE THAT WERE IN THE VICINITY OF
23 THE GUARDHOUSE?

24 A YES.

25 Q CAN YOU TELL US OTHER THAN MR. FRANCIS, WHO
26 YOU'VE ALREADY MENTIONED, WHAT, IF ANY -- WHO, IF ANY OTHER
27 CHURCH-AFFILIATED MEN, WERE IN THE VICINITY OF THE
28 GUARDHOUSE WHERE MR. FRANCIS AND MR. MULL WERE?

1 A WHO ELSE?

2 Q DO YOU KNOW WHO ELSE?

3 A THE ONLY OTHER PERSON I REMEMBER IS TOM MILLER.

4 Q DO YOU KNOW IF ANY OTHER CHURCH-AFFILIATED MEN

5 WERE IN THAT VICINITY OF THE AREA OF THE GUARDHOUSE WHERE

6 MR. FRANCIS AND MR. MILLER WERE EVEN IF YOU DON'T REMEMBER

7 THEIR NAMES?

8 A I THINK THERE WERE A COUPLE OF OTHER PEOPLE

9 THERE.

10 Q DID YOU SEE IN THE VICINITY OF THAT GUARDHOUSE

11 8 TO 20 JUDO EXPERTS BLOCKING THE ROAD IN FRONT OF MR. MULL?

12 A NO.

13 Q DID YOU SEE ANYBODY BLOCKING THE ROAD IN FRONT

14 OF MR. MULL?

15 A NO.

16 Q DID YOU SEE ANY MEN COME OUT FROM BEHIND THE

17 TREES ON THE SIDE OF THE ROAD AND BLOCK THAT ROAD?

18 A NO, I DID NOT.

19 Q DURING THE TIME YOU WERE IN THE PARKING LOT,

20 DID YOU SEE ANYONE MAKE ANY THREATENING PHYSICAL GESTURES

21 TOWARDS MR. MULL?

22 A NO.

23 Q DID YOU SEE ANYONE MAKE ANY PHYSICAL GESTURES

24 TOWARDS MR. MULL?

25 A NO, I DID NOT.

26 Q DID YOU SEE ANYONE TOUCH HIM?

27 A NO.

28 Q FROM WHERE YOU WERE IN THE PARKING LOT, DID YOU

1 HEAR WHAT WAS BEING SAID?

2 A NO, I REALLY COULDN'T HEAR THE WORDS THAT WERE
3 BEING SAID.

4 Q HOW MANY YEARS WERE YOU ON THE BOARD OF
5 DIRECTORS AT CAMELOT?

6 A I WAS SIX YEARS ON THE BOARD OF THE CHURCH.

7 Q WHAT WERE THOSE YEARS?

8 A OH, ROUGHLY -- LET'S SEE. ABOUT '70 -- '75 ON.

9 Q WHILE YOU WERE ON THE BOARD, DID YOU EVER HEAR
10 ANY DISCUSSIONS ABOUT THE CONTENT OF A SUMMIT UNIVERSITY
11 CLEARANCE OR CONFESSION LETTER?

12 A YES, I DID.

13 Q HOW MANY TIMES?

14 A ONE TIME.

15 Q WHAT WAS THE NATURE OF THAT DISCUSSION ABOUT
16 THE CONTENT OF A CLEARANCE LETTER, WITHOUT GIVING US ANY
17 NAMES OF WHOSE CLEARANCE LETTER IT WAS?

18 A IT WAS A DISCUSSION WHERE A PERSON WHO WAS
19 ATTENDING SUMMIT UNIVERSITY HAD CONFESSED IN THEIR LETTER
20 THAT THEY HAD BEEN ENGAGED IN THE MOLESTATION OF A CHILD OF
21 SOMEONE IN THE COMMUNITY.

22 Q AND WAS THERE A DISCUSSION ABOUT THAT AT THE
23 BOARD MEETING?

24 A YES. THE DISCUSSION CENTERED AROUND THE FACT
25 THAT BOTH OF THESE INDIVIDUALS WERE STILL ON THE CAMPUS AND
26 WHAT WERE WE GOING TO DO TO SEE THAT IT DIDN'T HAPPEN AGAIN.

27 Q JUST TO BE CLEAR, THAT CLEARANCE LETTER HAD
28 NOTHING TO DO WITH MR. MULL; IS THAT CORRECT?

1 A THAT'S CORRECT.

2 Q OTHER THAN THAT ONE INSTANCE THAT YOU'VE JUST
3 MENTIONED, WERE THERE ANY OTHER TIMES THAT THE CONTENTS OF A
4 SUMMIT UNIVERSITY CLEARANCE LETTER WERE DISCUSSED DURING A
5 BOARD MEETING DURING THE YEARS THAT YOU WERE ON THE BOARD?

6 A NO.

7 Q WERE THERE EVER ANY OCCASIONS WHEN YOU WERE ON
8 THE BOARD WHERE A CLEARANCE LETTER WAS BROUGHT TO A BOARD
9 MEETING?

10 A NO.

11 Q DO YOU KNOW WHO DR. RALPH YANEY IS?

12 A YES, I DO.

13 Q DURING THE YEARS THAT YOU WERE ON THE BOARD,
14 DID DR. YANEY EVER REPORT TO THE BOARD INFORMATION HE HAD
15 LEARNED IN COUNSELING SESSIONS WITH CHURCH MEMBERS?

16 A NO.

17 Q YOU CERTAIN OF THAT?

18 A YES.

19 Q WERE YOU IN CHARGE OF CHURCH FUND RAISING AT
20 ANY TIME?

21 A YES, I WAS.

22 Q DID YOU EVER ATTEND A SEMINAR ABOUT FUND
23 RAISING?

24 A YES, I DID.

25 Q HOW LONG WAS THE SEMINAR?

26 A SEMINAR WAS ABOUT A WEEK LONG.

27 Q DO YOU RECALL WHO GAVE IT OR SPONSORED IT?

28 A IT WAS A PRIVATE GROUP CALLED THE FUND RAISING

1 SCHOOL.

2 Q DO YOU RECALL WHAT YEAR IT OCCURRED?

3 A IT WAS AROUND 1975, '76.

4 Q DO YOU RECALL WHO ELSE WENT TO THAT SEMINAR?

5 A I WAS THE ONLY ONE FROM THE CHURCH. OTHER
6 PEOPLE WHO ATTENDED WERE THE FUND RAISING HEADS OF
7 DEPARTMENTS OF MAJOR CALIFORNIA INSTITUTIONS SUCH AS
8 COLLEGES, HOSPITALS. THERE MAY HAVE BEEN SOME OTHER
9 CHARITIES THERE. I DON'T KNOW.

10 Q SUBSEQUENT TO YOU GOING TO THAT MEETING, DID
11 CHURCH UNIVERSAL INCORPORATE ANY OF THE TECHNIQUES THAT YOU
12 LEARNED AT THOSE SEMINARS INTO THEIR FUND RAISING?

13 A YES, WE DID.

14 Q WERE THE TECHNIQUES THAT THE -- WITHDRAWN.

15 WERE THERE TECHNIQUES THAT CHURCH UNIVERSAL
16 EMPLOYED AFTER YOU WENT TO THAT SEMINAR THAT YOU HAD NOT
17 LEARNED AT THAT SEMINAR FOR FUND RAISING?

18 A WE DID SOME THINGS THAT THEY DIDN'T RECOMMEND,
19 YES.

20 Q WHAT THINGS DID CHURCH UNIVERSAL DO THAT WERE
21 NOT RECOMMENDED AT THAT SEMINAR?

22 A WELL, WHEN YOU ARE RAISING LARGE SUMS OF MONEY
23 IN SHORT PERIODS OF TIME, WHAT THEY CALL CAPITAL FUND
24 RAISING, THEY RECOMMEND THAT ALWAYS BE DONE FACE-TO-FACE
25 WITH PERSONAL INTERVIEWS AND SO FORTH. AND WE DIDN'T ALWAYS
26 DO THAT. WE WOULD OFTEN SEND OUT MAILING APPEALS ALONG WITH
27 OUR PERSONAL CONTACT WITH MEMBERS.

28 THEY ALSO RECOMMENDED THAT BEFORE WE EVER DID

1 ANY MAJOR FUND RAISING, THAT WE DO A NATIONWIDE SURVEY OF
2 OUR MEMBERSHIP TO DECIDE EXACTLY HOW MUCH MONEY WAS
3 REALISTIC TO RAISE.

4 Q DID YOU DO THAT AT CHURCH UNIVERSAL?

5 A NO.

6 Q WITH THOSE EXCEPTIONS, WERE THE PROCEDURES USED
7 FOR FUND RAISING BY CHURCH UNIVERSAL ALONG THE LINES THAT
8 WERE RECOMMENDED AT THE SEMINAR YOU WENT TO?

9 A BASICALLY, YES.

10 Q AND JUST IN GENERAL, WHAT WERE THE PROCEDURES
11 THAT WERE RECOMMENDED FOR FUND RAISING AT THE SEMINAR WHICH
12 CHURCH UNIVERSAL USED IN ITS FUND RAISING?

13 A WELL, THE OVERRIDING MESSAGE WHICH THEY
14 COMMUNICATED WHICH THEY GAVE TO US IS THAT IF YOU ARE GOING
15 TO DO SUCCESSFUL FUND RAISING, YOU NEED TO COMMUNICATE YOUR
16 MISSION WELL TO YOUR MEMBERSHIP, TO BE SURE THAT THEY
17 UNDERSTAND WHAT IT IS THAT YOU ARE STRIVING TO DO AND TO
18 FURTHERMORE MAKE THEM AWARE OF YOUR NEED OF WHAT YOU NEED
19 FINANCIALLY IN ORDER TO ACCOMPLISH THAT MISSION. AND THAT
20 THE MORE THOROUGHLY YOU COULD BE IN YOUR COMMUNICATION, THE
21 MORE SUCCESSFUL YOU WOULD BE.

22 ONE OF THE OTHER THINGS THEY DID TELL US, THAT
23 IT WAS GOOD WHEN WE HAVE -- THEY ALSO TAUGHT US THAT
24 STATISTICALLY IN EVERY FUND RAISING DRIVE FOR WHAT THEY CALL
25 CAPITAL FUND RAISING, INEVITABLY IT ALWAYS WAS A CASE OF
26 WHERE THE LARGE CONTRIBUTIONS FROM MAYBE 10 OR 15 PERCENT OF
27 THE TOTAL DONOR BASE WOULD ACCOUNT FOR THE VAST MAJORITY OF
28 THE TOTAL CONTRIBUTIONS. IN OTHER WORDS, THAT DEALING WITH

1 INDIVIDUALS WAS A VERY REAL PART OF THAT FUND RAISING
2 EFFORT.

3 Q AT THE SEMINAR, DID THEY TEACH YOU ANYTHING
4 ABOUT KEEPING FILES ON CONTRIBUTORS AND POTENTIAL
5 CONTRIBUTORS?

6 A YES. THEY RECOMMENDED THAT WE KEEP SUCH
7 RECORDS ON PEOPLE THAT WE FELT WOULD BE POTENTIAL DONORS.

8 Q AND DID THE CHURCH DO THAT?

9 A YES, WE DID.

10 Q WHAT WAS THE PRIMARY SOURCE OF INFORMATION FOR
11 YOUR FILES ON CONTRIBUTORS AND POTENTIAL CONTRIBUTORS?

12 A WE USED THE DONATION RECORDS THAT WE HAD OF
13 PEOPLE WHO WERE ALREADY IN THE ORGANIZATION AS WELL AS
14 WHATEVER RECORD WE HAD OF WHAT PUBLICATIONS THEY PURCHASED
15 WITH THE CHURCH.

16 MR. KLEIN: THANK YOU.

17 I HAVE NO FURTHER QUESTIONS, YOUR HONOR.

18 THE COURT: ALL RIGHT. PLEASE PROCEED.

19 MR. LEVY: THANK YOU, YOUR HONOR.

20

21 CROSS-EXAMINATION +

22 BY MR. LEVY:

23 Q MR. SHEARER, DO I UNDERSTAND CORRECTLY YOU ARE
24 NOT A -- EXCUSE ME, I DON'T WANT TO INTERRUPT YOU.

25 DO I UNDERSTAND CORRECTLY NOW AT THIS TIME YOU
26 ARE NO LONGER A MEMBER OF THE CHURCH?

27 A THAT'S CORRECT.

28 Q WHEN DID YOU FIRST BECOME INVOLVED WITH THE

1 CHURCH?

2 A PROBABLY AROUND 1967, '68.

3 Q COULD I ASK YOU WHAT YOUR AGE IS NOW?

4 A THIRTY-EIGHT.

5 Q MAYBE YOU CAN HELP ME WITH MY MATHEMATICS. HOW
6 OLD WERE YOU AT THE TIME IN 1967 OR '68?

7 A ABOUT 20 YEARS OLD.

8 Q NOW, WHERE WAS THE CHURCH LOCATED WHEN YOU
9 FIRST BECAME INVOLVED?

10 A COLORADO SPRINGS.

11 Q DID THE CHURCH HAVE A PROPERTY IN SANTA BARBARA
12 AT THAT TIME?

13 A NO.

14 Q DID THEY ACQUIRE ONE SHORTLY THEREAFTER?

15 A YES, THEY DID.

16 Q AND WHEN DID THEY ACQUIRE THE PROPERTY IN SANTA
17 BARBARA?

18 A MID 1969 I BELIEVE.

19 Q AND IN MID 1969, WHAT WAS YOUR JOB WITH THE
20 CHURCH?

21 A I WAS IN CHARGE OF THE PREMISES IN SANTA
22 BARBARA AND ALSO IN CHARGE OF THE REHABILITATION OF THE
23 PROPERTY, WHAT WE CALLED THE MOTHERHOUSE AT THAT TIME.

24 Q WERE YOU WORKING THERE WHEN YOU GOT YOUR DRAFT
25 NOTICE?

26 A NO.

27 Q MR. SHEARER, IS IT NOT A FACT THAT WHEN YOU GOT
28 YOUR DRAFT NOTICE, YOU HAD NO EXEMPTION AND MR. MARK PROPHET

1 ARRANGED FOR YOU TO BECOME A MINISTER SO YOU WOULDN'T HAVE
2 TO GO IN THE SERVICE?

3 A NO --

4 MR. KLEIN: YOUR HONOR, I AM GOING TO --

5 THE WITNESS: NO. I HAD A 2-S EXEMPTION AND THEY
6 WERE PROPOSING THAT IT BE CHANGED FROM A 2-S AS A STUDENT
7 EXEMPTION. AND WHILE I WAS STILL A STUDENT EXEMPTION, I WAS
8 APPLYING FOR IT TO BE CHANGED TO A MINISTERIAL EXEMPTION,
9 WHICH WAS GRANTED.

10 Q BY MR. LEVY: WAS IT NOT MR. MARK PROPHET WHO
11 AT THAT TIME DECIDED TO ANOINT YOU AS A MINISTER IN THE
12 CHURCH TO ASSIST YOU WITH GETTING YOUR DRAFT EXEMPTION?

13 A I WAS ORDAINED, BUT THAT WAS NOT THE REASON I
14 WAS ORDAINED.

15 Q WAS IT MARK PROPHET WHO ORDAINED YOU?

16 A YES.

17 Q NOW, YOU'VE TOLD US ABOUT A RATHER ILLUSTRIOUS
18 CAREER WITH THE CHURCH. YOU WERE AN ARCHBISHOP OF THE
19 CHURCH?

20 A ARCHBISHOP OF THE NEW JERUSALEM.

21 Q AND WHEN DID YOU BECOME ARCHBISHOP?

22 A I BELIEVE IT WAS AROUND 1975.

23 Q LET'S SEE. YOU WOULD HAVE BEEN ALL OF ABOUT 25
24 OR 26 WHEN YOU BECAME ARCHBISHOP OF THE CHURCH, IS THAT
25 CORRECT?

26 A THAT'S CORRECT.

27 Q AT THAT TIME, WERE YOU ALSO VICE PRESIDENT OF
28 THE CHURCH?

1 A YES.

2 Q AND YOU WERE A MEMBER OF THE BOARD OF
3 DIRECTORS?

4 A YES.

5 Q WHAT YEAR WAS IT THAT YOU DECIDED TO MOVE ON TO
6 BIGGER AND BETTER THINGS AND LEAVE THE CHURCH?

7 A 1981.

8 Q IF I ADDED CORRECTLY, THAT IS AN ASSOCIATION OF
9 SOME 14 YEARS WITH THE CHURCH?

10 A YES. TWELVE YEARS ON THE STAFF AND A YEAR AND
11 A HALF OR TWO YEARS BEFORE THAT.

12 Q THAT IS ROUGHLY HALF OF YOUR LIFE AT THAT TIME
13 YOU WERE ASSOCIATED WITH THE CHURCH.

14 WERE THERE NO FURTHER GOALS IN THE CHURCH FOR
15 YOU TO PURSUE OR WAS THE TOP SPOT ALREADY TAKEN?

16 A THE TOP SPOT WAS TAKEN.

17 Q THE TEACHINGS THAT GO ON AT YOUR CHURCH, AND I
18 WILL REFER TO IT AS YOUR CHURCH BECAUSE YOU ARE COMING HERE
19 AND TESTIFYING TODAY FOR THE CHURCH.

20 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THAT
21 CHARACTERIZATION.

22 THE COURT: WHY DON'T YOU START THE QUESTION OVER.

23 Q BY MR. LEVY: THE TEACHINGS AT THE CHURCH, WHO
24 DETERMINES WHAT THE PARAMETERS OF THE TEACHINGS WILL BE
25 OTHER THAN ELIZABETH?

26 A THE PARAMETERS OF THE TEACHINGS? I DON'T KNOW
27 WHAT YOU MEAN BY "THE PARAMETERS."

28 Q OH, COME ON. YOU HAVE GOT A COLLEGE EDUCATION

1 AND YOU WORK IN BUSINESS. THE PARAMETERS MEAN FROM ONE SIDE
2 TO THE OTHER, WHAT THEY WILL ENCOMPASS, DON'T THEY?

3 A YOU ASKED ME WHAT -- I DON'T UNDERSTAND IF YOU
4 ARE ASKING WHAT THE DOCTRINE WILL BE OR WHAT WILL BE TAUGHT
5 ABOUT THAT DOCTRINE.

6 Q LET'S DO BOTH OF THEM. LET'S TAKE ONE FIRST.
7 WHO MAKES THE DECISION AS WHAT WILL BE TAUGHT
8 IN THE CHURCH OTHER THAN ELIZABETH?

9 A WELL --

10 Q EXCUSE ME. MISS FRANCIS.

11 A MINISTERS WHO ARE GOING TO GIVE LECTURES WILL
12 DECIDE WHAT TOPIC THEY ARE GOING TO SPEAK ON.

13 Q NO, NO, THAT IS NOT WHAT I AM TALKING ABOUT,
14 WHAT TOPIC THEY WILL SPEAK ON.

15 I MEAN WHO DETERMINES WHAT THE RELIGIOUS
16 TEACHINGS OF THE CHURCH ARE TO BE? IS THERE ANYBODY BESIDE
17 MISS FRANCIS WHO GETS MESSAGES --

18 A NO ONE ELSE BESIDES HER GETS MESSAGES. WE
19 BELIEVE --

20 Q IS IT NOT --

21 A WE BELIEVE THE ASCENDED MASTERS DETERMINE WHAT
22 THE TEACHINGS ARE.

23 Q AND WHATEVER -- WHEN MARK WAS STILL ALIVE,
24 WHATEVER MARK AND ELIZABETH TOLD YOU, THAT WAS THE BEGINNING
25 AND THE END OF THE TEACHINGS, WAS IT NOT?

26 A NO. THERE WAS A HISTORY OF TEACHINGS THAT
27 PRECEDED MARK AND ELIZABETH.

28 Q IS THAT WHAT CAME FROM THE I AM MOVEMENT?

1 A YES.

2 Q AND MR. PROPHET CONVERTED THAT TO HIS SUMMIT
3 LIGHTHOUSE AT THAT TIME?

4 A I WOULD SAY THAT THERE WAS ACKNOWLEDGMENT GIVEN
5 OF THAT TEACHING. I WOULDN'T SAY THAT IT WAS CONVERTED.

6 Q HE TOOK BASICALLY WHAT THE I AM MOVEMENT TAUGHT
7 AND INCORPORATED IT INTO THE SUMMIT LIGHTHOUSE TEACHINGS,
8 DID HE NOT?

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

11 THE COURT: OVERRULED.

12 THE WITNESS: WELL, TRUTH IS TRUTH. AND IF THE
13 ASCENDED MASTERS CHOSE TO SAY THE SAME THING THROUGH HIM
14 THAT THEY HAD SAID THROUGH OTHERS, THAT IS THE WAY I BELIEVE
15 IT HAPPENED.

16 Q BY MR. LEVY: OKAY. THAT IS A VERY NICE
17 SPEECH. NOW, BACK TO THE QUESTION.

18 WITH REGARD TO THE TEACHINGS OF THE I AM
19 MOVEMENT, MR. MARK PROPHET INCORPORATED THOSE TEACHINGS INTO
20 THE TEACHINGS OF HIS SUMMIT LIGHTHOUSE; IS THAT AN ACCURATE
21 STATEMENT?

22 A I'VE JUST SAID I THINK THE ASCENDED MASTERS
23 GAVE THE TEACHINGS THROUGH MARK PROPHET. AND IT JUST SO
24 HAPPENED THAT THE SAME ASCENDED MASTERS HAD GIVEN SIMILAR
25 TEACHINGS IN PREVIOUS YEARS.

26 Q WHEN THE SUMMIT LIGHTHOUSE WAS STARTED, WAS IT
27 A MAIL-ORDER OPERATION?

28 A NO. IT HAD CONFERENCES AND IT HAD MEMBERS WITH

1 GROUPS ALL AROUND THE UNITED STATES. WELL, NOT WHEN IT
2 FIRST STARTED, OBVIOUSLY. BUT IT DID HOLD CONFERENCES.

3 Q ARE YOU AWARE THAT IN ELIZABETH CLARE PROPHET'S
4 DEPOSITION WHEN SHE DESCRIBED SUMMIT LIGHTHOUSE AT ITS
5 INCEPTION, SHE SAID THAT THE BULK OF WHAT WAS DONE WAS DONE
6 THROUGH THE MAILS AND ON OCCASION MR. PROPHET WOULD HAVE
7 MEETINGS WITH PEOPLE WHO ASKED FOR AN AUDIENCE WITH HIM?

8 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THAT
9 CHARACTERIZATION OF THE TESTIMONY FROM THE DEPOSITION. IT
10 IS A MISCHARACTERIZATION.

11 THE COURT: I HAVEN'T READ THAT PORTION OF THE
12 DEPOSITION SO I AM NOT IN A POSITION RIGHT NOW TO AGREE OR
13 DISAGREE WITH EITHER OF YOU.

14 DO YOU WANT TO PULL OUT THE DEPOSITION AND READ
15 THAT PORTION, MR. LEVY?

16 MR. LEVY: I WILL DO THAT AT A LATER TIME WHEN MISS
17 PROPHET IS BACK ON THE STAND.

18 Q LET ME ASK YOU ANOTHER QUESTION, MR. SHEARER.

19 IF ELIZABETH GAVE YOU INFORMATION THAT
20 PURPORTED TO COME FROM THE ASCENDED MASTERS, AS SHE DOES AT
21 SO MANY OF THE CHURCH SERVICES, WOULD YOU PERSONALLY HAVE
22 ANY WAY OF VERIFYING WHATEVER THE MESSAGE WAS FROM WHICHEVER
23 ASCENDED MASTER IT CAME?

24 MR. KLEIN: YOUR HONOR, OBJECT ON FREEDOM OF RELIGION
25 GROUNDS, YOUR HONOR.

26 THE COURT: OVERRULED.

27 THE WITNESS: I BELIEVE THE SAME THING THAT WAS
28 TAUGHT IN THE BIBLE WHEN --

1 Q BY MR. LEVY: EXCUSE ME, MR. SHEARER.

2 A YOU ARE ASKING ME WHAT I BELIEVE.

3 Q NO, I AM NOT ASKING WHAT YOU BELIEVE, SIR.

4 THE COURT: PLEASE LISTEN TO THE QUESTION AND PLEASE
5 ANSWER THE QUESTION. THE QUESTION THAT IS ASKED, NOT SOME
6 OTHER QUESTION THAT HASN'T BEEN ASKED.

7 Q BY MR. LEVY: IF YOU WERE AT A REGULAR CHURCH
8 SERVICE AND ELIZABETH GAVE YOU A MESSAGE THAT PURPORTED TO
9 BE FROM THE MASTERS, WOULD YOU PERSONALLY HAVE ANY WAY OF
10 VERIFYING THAT IN FACT IT WAS A MESSAGE FROM THE MASTERS?

11 A YES.

12 Q AND HOW WOULD YOU GO ABOUT THAT, SIR?

13 A CONFIRMATION OF MY HEART.

14 Q SOMEWHAT LIKE MAYBE MR. MULL WOULD CONFIRM
15 MESSAGES ALSO AS TO WHAT HE BELIEVED AND A CONFIRMATION OF
16 HIS HEART?

17 MR. KLEIN: I WOULD OBJECT TO KNOWING WHAT MR. MULL
18 DOES IN HIS HEART, YOUR HONOR.

19 THE COURT: OVERRULED.

20 Q BY MR. LEVY: NOW, YOU HAVE BEEN OUT OF THE
21 CHURCH FOR A NUMBER OF YEARS. DO YOU STILL BELIEVE
22 ELIZABETH CLARE PROPHET IS THE ONLY MESSENGER ON THE FACE OF
23 THE EARTH?

24 A NO. I BELIEVE SHE IS A MESSENGER.

25 Q WHEN YOU SAY YOU BELIEVE SHE IS THE
26 MESSENGER --

27 A I BELIEVE SHE IS THE MESSENGER.

28 Q WHAT DOES THAT MEAN, SIR?

1 A I BELIEVE THAT THE ASCENDED MASTERS HAVE CHOSEN
2 TO EXPRESS THEIR -- THEIR INSTRUCTION TO MANKIND THROUGH
3 HER. BUT I DIDN'T SAY THAT ON THE FACE OF THE ENTIRE EARTH
4 THAT SHE WAS THE ONLY ONE.

5 Q THERE MAY BE A COUPLE OF OTHERS HIDING OUT
6 SOMEWHERE?

7 A I DON'T KNOW.

8 Q AFTER 14 YEARS WITH THE CHURCH AND ACHIEVING
9 THE EXALTED POSITIONS THAT YOU DID, WAS THERE ANYTHING THAT
10 OCCURRED AT THE CHURCH THAT MADE YOU BELIEVE THERE MIGHT BE
11 GREENER PASTURES ON THE OUTSIDE?

12 A NO.

13 Q WHAT I AM TRYING TO DO, SIR, IS HAVE YOU HELP
14 ME UNDERSTAND WHY AFTER AN ASSOCIATION OF SOME 14 OR 15
15 YEARS, WHY YOU WERE -- WHERE YOU BECAME ONE OF THE
16 CONTROLLING PEOPLE WITHIN THAT ORGANIZATION, WHY YOU CHOSE
17 TO JUST THROW IT ALL ASIDE TO GO OUT THERE TO GET INTO THE
18 COMMERCIAL FIELD AND JUST START EARNING A LIVING LIKE
19 EVERYBODY ELSE?

20 A I, LIKE A LOT OF OTHER PEOPLE, MADE A CAREER
21 CHANGE.

22 Q YOU MEAN KIND OF LIKE IN ROME THE POPE COULD
23 JUST ONE DAY SAY, "I THINK I WILL BE A FOOTBALL PLAYER. I
24 THINK I WILL JUST GIVE IT UP"?

25 MR. KLEIN: OBJECT AS ARGUMENTATIVE, YOUR HONOR.

26 THE COURT: SUSTAINED.

27 Q BY MR. LEVY: DID ANYTHING OCCUR AT THE CHURCH
28 THAT CAUSED YOU TO LEAVE THE CHURCH WHEN YOU DID?

1 A NO.

2 Q MR. SHEARER, ISN'T IT A FACT THAT ELIZABETH
3 CLARE PROPHET WAS SAYING AN AWFUL LOT OF DEROGATORY THINGS
4 ABOUT YOUR WIFE — HOW DO YOU PRONOUNCE HER NAME, ALAYDA?

5 A ALEYDA.

6 Q ALEYDA.

7 ELIZABETH CLARE PROPHET SAID THINGS LIKE YOUR
8 WIFE HAD A POVERTY CONSCIENCE, AND THAT YOU COULDN'T DEVOTE
9 ALL OF YOUR TIME TO THE CHURCH, THAT YOUR WIFE WAS A
10 DISTRACTION; AND IT WAS A MUTUAL ARRANGEMENT THAT AFTER YOUR
11 14 YEARS, THAT IT MIGHT BE BETTER FOR THE CHURCH IF YOU
12 SOUGHT EMPLOYMENT ON THE OUTSIDE?

13 IS THAT NOT IN FACT WHAT HAPPENED WHEN YOU LEFT
14 THE CHURCH?

15 MR. KLEIN: YOUR HONOR, THAT IS A COMPOUND QUESTION,
16 YOUR HONOR.

17 THE COURT: HE CAN ANSWER.

18 THE WITNESS: ARE YOU ASKING ME A YES OR NO QUESTION?

19 THE COURT: WHY DON'T YOU BREAK UP THE QUESTION INTO
20 SMALLER PARTS.

21 Q BY MR. LEVY: DID ELIZABETH CLARE PROPHET TELL
22 YOU THAT YOUR WIFE ALEYDA HAD A POVERTY CONSCIENCE, AND THAT
23 IT WOULD BE BETTER FOR YOU NOT TO DEVOTE SO MUCH TIME TO
24 YOUR WIFE, AND TO EITHER DEVOTE IT TO THE CHURCH OR TO LEAVE
25 THE CHURCH?

26 A NO.

27 Q DID YOU GET IN A LITTLE BIT OF TROUBLE WHEN YOU
28 GAVE MR. MULL THE AUDIO CASSETTE TAPES OF THE LAST TWO AND A

1 HALF HOUR CONFERENCE?

2 A NO, I DIDN'T GET IN ANY TROUBLE.

3 Q NOTHING HAPPENED OTHER THAN YOU DECIDED THAT
4 YOU HAD YOUR FILL OF FUNCTIONING WITH THE CHURCH AND THAT
5 WAS THE ONLY REASON YOU LEFT THE CHURCH; IS THAT WHAT YOU
6 ARE TELLING US?

7 A I AM NOT SAYING I HAD MY FILL OF FUNCTIONING
8 WITH THE CHURCH. I AM SAYING I LIKE PLENTY OF THE PEOPLE IN
9 OTHER KINDS OF WALKS OF LIFE, OTHER KINDS OF BUSINESSES.
10 THERE COMES A TIME WHEN YOU WANT TO MAKE A CAREER CHANGE
11 WITH YOUR LIFE.

12 Q NOW, HAVE YOU EVER HEARD OF THE TERM
13 "HIERARCHS"?

14 A YES.

15 Q IS THAT A TERM THAT IS COMMONLY USED IN YOUR
16 CHURCH?

17 A YES.

18 Q WHO WAS MR. MULL'S HIERARCH?

19 A WELL, THE TERM HIERARCH -- MR. MULL DIDN'T HAVE
20 A HIERARCH. MR. MULL HAD PEOPLE -- DEPARTMENT HEADS, WHAT
21 HAVE YOU, THAT HE ANSWERED TO.

22 HIERARCH WAS A TERM THAT WE USED TO DESCRIBE
23 THE ASCENDED MASTERS AND THEIR RESPONSIBILITIES FOR CERTAIN
24 ROLES THAT THEY PLAY.

25 I WAS GREGORY MULL'S DEPARTMENT HEAD, IF YOU
26 WANT TO CALL IT THAT, TOGETHER WITH EDWARD.

27 Q WERE YOU AWARE THAT THERE HAS BEEN TESTIMONY IN
28 THIS COURT BY OTHER MEMBERS OF YOUR CHURCH UNIVERSAL AND

1 TRIUMPHANT THAT TOLD US THAT THE PEOPLE IN CHARGE OF THE
2 CHURCH WERE CALLED HIERARCHS?

3 A NO, I AM NOT AWARE OF THAT.

4 Q ARE YOU TELLING ME THAT NO ONE IN THE CHURCH OR
5 ON THE CHURCH PREMISES WAS EVER REFERRED TO AS A HIERARCH
6 WITH REGARD TO THE PEOPLE WHO FUNCTIONED UNDERNEATH THEM?

7 A I CAN'T MAKE SUCH A CATEGORICAL STATEMENT AS
8 YOU JUST SAID.

9 Q IF I WERE TO TELL YOU THAT ELIZABETH CLARE
10 PROPHET, IN HER TESTIMONY AT HER DEPOSITION, EXPLAINED TO US
11 WHO AND WHAT HIERARCHS WERE AND IT WAS DIFFERENT FROM YOUR
12 DESCRIPTION RIGHT NOW, IN YOUR OPINION WHO WOULD BE RIGHT?
13 YOU OR HER?

14 MR. KLEIN: I AM GOING TO OBJECT SINCE HE DOESN'T
15 EVEN KNOW WHAT ELIZABETH CLARE PROPHET SAID. IT JUST CALLS
16 FOR SPECULATION.

17 THE COURT: SUSTAINED.

18 Q BY MR. LEVY: WERE YOU IN CHARGE OF THE
19 DEPARTMENT WHERE GREGORY MULL WORKED?

20 A YES.

21 Q WAS ED FRANCIS THE CODEPARTMENT HEAD?

22 A BASICALLY ON PROJECTS EDWARD WAS CODEPARTMENT
23 HEAD.

24 Q DID MR. MULL HAVE THE AUTHORITY TO CHOOSE
25 WHATEVER PROJECTS HE WOULD WORK ON?

26 A NO.

27 Q THE PROJECTS THAT HE WORKED ON WERE DIRECTED BY
28 EITHER YOU OR ED FRANCIS?

1 A MOST OF THE TIME. I THINK THERE WERE A FEW
2 THINGS THAT HE WORKED ON THAT HE WANTED TO WORK ON, BUT MOST
3 OF THE TIME HE WORKED ON THE PROJECTS THAT WE ASSIGNED HIM.

4 Q DID THE CHURCH HAVE AN ARCHITECTURAL FIRM THAT
5 DID SOME WORK FOR IT PRIOR TO MR. MULL BECOMING INVOLVED AND
6 COMING TO CAMELOT TO WORK FOR THE CHURCH?

7 A YES.

8 Q WHAT WAS THE NAME OF THAT FIRM?

9 A SMITH AND WILLIAMS.

10 Q CAN YOU TELL US BRIEFLY WHAT IT WAS THEY DID
11 FOR THE CHURCH?

12 A YES. THEY DESIGNED THE MASTER PLAN, CAMELOT
13 MASTER PLAN.

14 Q THEY GIVE YOU ALL THE WORKING DRAWINGS FOR ALL
15 THE BUILDINGS THAT WERE GOING TO BE DRAWN -- BUILT, RATHER?

16 A THEY DIDN'T DO WORKING DRAWINGS ON INDIVIDUAL
17 BUILDINGS. THEY DID THE MASTER PLAN.

18 Q THE MASTER PLAN, DOES THAT INCLUDE THE LAYOUT
19 IN THE TEN-YEAR PLAN IN THE CAMELOT BOOKLET?

20 A YES.

21 Q IS THAT WHAT THEY DID, THAT CENTER PAGE? DO
22 YOU REMEMBER WHAT IT WAS THEY CHARGED THE CHURCH?

23 A I THINK IT WAS ROUGHLY \$50,000.

24 Q FOR DOING THAT MASTER PLAN?

25 A YES.

26 Q DO YOU RECALL EVER HAVING MR. GREGORY MULL TAKE
27 SOME OF THE PLANS THAT HE HAD DRAWN FOR THE MONTESSORI
28 SCHOOL AND PRESENT THEM AT A CONFERENCE TO EXPLAIN TO THE

1 ATTENDEES OF THE CONFERENCE WHAT IT WAS THAT THE CHURCH
2 PLANNED TO BUILD ON ITS PREMISES AT CAMELOT?

3 A I CAN'T SAY THAT I REMEMBER THAT.

4 Q WASN'T IT YOU WHO ASKED HIM TO BRING THE PLANS?

5 A I DEFINITELY REMEMBER GREGORY BRINGING PLANS AT
6 VARIOUS TIMES AND THE BOARD DISCUSSING THOSE PLANS, YES.

7 Q YOU HAVE NO RECOLLECTION OF YOU ASKING HIM TO
8 BRING PLANS OF THE MONTESSORI SCHOOL TO A CONFERENCE WHERE
9 THEY COULD BE DISPLAYED TO THE ATTENDEES OF THE CONFERENCE?

10 A THE CONFERENCE WERE HELD ON THE SAME GROUNDS
11 WHERE HE WORKED. SO I CAN'T -- HE MIGHT HAVE MADE A
12 PRESENTATION. I JUST DON'T REMEMBER.

13 Q WELL, YOU WERE HIS BOSS. HE WOULDN'T HAVE JUST
14 MADE A PRESENTATION WITHOUT YOUR AUTHORIZATION AND APPROVAL,
15 WOULD HE?

16 A NO, HE WOULDN'T HAVE DONE THAT WITHOUT MY
17 APPROVAL.

18 Q AND IF HE DID MAKE A PRESENTATION, YOU WOULD
19 HAVE KNOWN ABOUT IT AND YOU WOULD HAVE AUTHORIZED IT, WOULD
20 YOU NOT HAVE?

21 A AT THE TIME.

22 Q DO YOU REMEMBER HOW MUCH MONEY WAS RAISED ON
23 THE PRESENTATION OF HIS PLANS AT THE CONFERENCE?

24 MR. KLEIN: I AM GOING TO OBJECT. THERE HAS BEEN NO
25 TESTIMONY THAT THE PLANS WERE PRESENTED. HE SAID HE DIDN'T
26 KNOW, YOUR HONOR.

27 THE COURT: SUSTAINED.

28 Q BY MR. LEVY: WERE YOU IN THE CHURCH WHEN THE

1 CHURCH HAD A PROBLEM WITH CLAYTON BROKERAGE?

2 A YES, I WAS IN THE CHURCH.

3 Q WOULD YOU TELL US BRIEFLY WHAT THAT IS ABOUT
4 AND WITH REGARD --

5 MR. KLEIN: YOUR HONOR, I --

6 MR. LEVY: WAIT UNTIL I FINISH.

7 MR. KLEIN: I THOUGHT YOU WERE DONE.

8 Q BY MR. LEVY: WITH REGARD TO WHY THE NAME OF
9 THE CHURCH EVENTUALLY CHANGED FROM SUMMIT LIGHTHOUSE TO
10 CHURCH UNIVERSAL AND TRIUMPHANT?

11 MR. KLEIN: YOUR HONOR, ONCE AGAIN I WOULD OBJECT AS
12 TO RELEVANCE AND 787 OF THE EVIDENCE CODE.

13 THE COURT: OVERRULED.

14 YOU CAN ANSWER.

15 THE WITNESS: WELL, FIRST LET ME SAY THAT I DIDN'T
16 GET -- I WAS NOT FIRSTHAND INVOLVED WHEN THE CLAYTON
17 BROKERAGE THING OCCURRED. BUT I WAS AWARE OF IT THEREAFTER.

18 AND THE REASON THAT THE CHURCH -- ONE OF THE
19 REASONS THAT -- THERE WERE SEVERAL REASONS WHY CHURCH
20 UNIVERSAL AND TRIUMPHANT WAS FOUNDED. ONE OF THE PRIMARY
21 REASONS WAS ONE OF THE ASCENDED MASTERS HAD CALLED FOR THE
22 FOUNDING OF THE CHURCH.

23 AND A SECONDARY REASON WAS THAT BECAUSE RANDALL
24 KING HAD BEEN INVOLVED IN THESE -- THIS CLAYTON BROKERAGE
25 BUSINESS, THAT IT HAD JEOPARDIZED THE TAX-EXEMPT STATUS OR
26 WAS THREATENING THE TAX-EXEMPT STATUS OF THE SUMMIT
27 LIGHTHOUSE. AND ON THE ADVICE OF OUR COUNSEL, WE FORMED THE
28 CHURCH UNIVERSAL AND TRIUMPHANT.

1 Q BY MR. LEVY: ISN'T IT A FACT THAT RANDALL
2 KING, ELIZABETH CLARE PROPHET WERE USING CHURCH MONEY FOR
3 THEIR PRIVATE INVESTMENTS, AND THE I.R.S. GOT INVOLVED, AND
4 CLAYTON BROKERAGE GOT INVOLVED, AND YOUR ATTORNEY TOLD YOU
5 AT THE TIME THAT YOU COULDN'T STRADDLE THE FENCE, THAT YOU
6 ARE GOING TO HAVE TO GO ONE WAY OR THE OTHER, SETTLE THE
7 CLAYTON BROKERAGE CASE OR THE I.R.S. WILL TAKE AWAY YOUR
8 TAX-EXEMPT STATUS?

9 MR. KLEIN: ONCE AGAIN, YOUR HONOR, IT IS A COMPOUND
10 QUESTION AND I WOULD ALSO OBJECT PURSUANT TO 787 OF THE
11 EVIDENCE CODE.

12 THE COURT: SUSTAINED.

13 Q BY MR. LEVY: TO YOUR KNOWLEDGE, WAS ELIZABETH
14 CLARE PROPHET AND RANDALL KING USING CHURCH FUNDS FOR THEIR
15 PRIVATE INVESTMENTS?

16 A NO, NOT TO MY KNOWLEDGE. I WAS NOT A MEMBER OF
17 THE BOARD OF DIRECTORS OF THE SUMMIT LIGHTHOUSE AT ANY
18 POINT.

19 Q NO. BUT YOU WERE A MEMBER OF THE BOARD OF
20 DIRECTORS OF CHURCH UNIVERSAL AND TRIUMPHANT?

21 A SUBSEQUENT TO THAT TIME.

22 Q DID YOU TESTIFY -- DID YOU GIVE A DEPOSITION IN
23 THE CLAYTON BROKERAGE CASE?

24 A NO.

25 Q DID YOU TESTIFY OR GIVE A DEPOSITION IN THE
26 CLARE DU BOIS CASE?

27 A NO.

28 Q CAN YOU TELL THE COURT BRIEFLY THE CHURCH'S

1 INVOLVEMENT, WHILE YOU WERE A MEMBER OF THE CHURCH, WITH THE
2 CLARE DU BOIS CASE?

3 MR. KLEIN: ONCE AGAIN I WOULD OBJECT PURSUANT TO 787
4 OF THE EVIDENCE CODE AND RELEVANCY TO THIS CASE.

5 THE COURT: SUSTAINED.

6 MR. LEVY: MAY WE APPROACH THE BENCH, YOUR HONOR?

7 THE COURT: ALL RIGHT.

8 (THE FOLLOWING PROCEEDINGS WERE HELD
9 AT THE BENCH:)

10 THE COURT: WHAT IS THE RELEVANCY TO MR. MULL'S CASE?

11 MR. LEVY: THIS MAN IS A DEFENDANT IN THE CHURCH.
12 THIS MAN IS A DEFENDANT IN THIS CASE. IT IS INTENDED FOR
13 IMPEACHMENT. HE HAS TESTIFIED THAT THEY HAVE NEVER DONE
14 THIS AND THEY HAVE NEVER DONE THAT.

15 THE COURT: WHAT IS THE STATUS OF THIS OTHER CASE
16 THAT YOU REFERRED TO?

17 MR. LEVY: THE STATUS OF THE OTHER CASE IS THAT THE
18 CHURCH PAID THIS WOMAN BACK SOME OF HER MONEY TO TERMINATE
19 THOSE PROCEEDINGS. THIS MAN WAS INVOLVED --

20 THE COURT: PLEASE ANSWER MY QUESTION.

21 MR. LEVY: MAYBE I DON'T UNDERSTAND YOUR QUESTION.

22 THE COURT: WHAT IS THE STATUS OF THE OTHER CASE TO
23 WHICH YOU JUST REFERRED? IS IT PENDING, HAS IT BEEN
24 SETTLED --

25 MR. LEVY: IT HAS BEEN SETTLED, YOUR HONOR.

26 THE COURT: IT WAS SETTLED WITHOUT --

27 MR. LEVY: WITHOUT A COMPLETION OF THE TRIAL. PAPERS
28 WERE FILED --

1 THE COURT: SO WHAT IF HE WAS A DEFENDANT? SO WHAT
2 IF SOMEBODY MADE SOME ACCUSATIONS TOWARD HIM? WHAT IS THE
3 RELEVANCE?

4 MR. LEVY: I BELIEVE IT GOES TO SHOW THE VERY NATURE
5 AND QUALITY OF THIS CHURCH, YOUR HONOR, AND THEIR DEALINGS
6 WITH NOT ONLY MR. MULL, BUT WITH ANY NUMBER OF PEOPLE.

7 THE COURT: I HAVE NO BASIS FOR EVALUATING THAT OTHER
8 CASE. THE OBJECTION IS SUSTAINED ON RELEVANCY GROUNDS.

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

11 Q BY MR. LEVY: MR. SHEARER, LET ME ASK YOU A
12 QUESTION.

13 IF I AM CORRECT, YOU STATED BEFORE THAT GREGORY
14 MULL DECIDED TO COME TO CAMELOT AND WORK AS THE ARCHITECT
15 THERE; IS THAT CORRECT?

16 A YES.

17 Q CAN JUST ANY CHURCH MEMBER MOVE ONTO THE
18 PREMISES AT CAMELOT WITHOUT INVITATION?

19 A NO.

20 Q WAS GREGORY SO SPECIAL THAT HE COULD JUST MOVE
21 IN BECAUSE HE CHOSE TO DO SO?

22 A YOU ASKED ME IF HE DECIDED TO COME. I SAID
23 YES. HE WAS ALSO INVITED.

24 Q WAS THERE A TIME PRIOR TO -- STRIKE THAT.

25 AM I CORRECT IN UNDERSTANDING THAT IT WAS THE
26 CHURCH'S INTENTION TO HAVE MR. MULL COME TO CAMELOT TO
27 DESIGN THE NEW JERUSALEM?

28 A NO.

1 Q HE WAS ASKED TO COME THERE FOR WHAT PURPOSE?

2 A TO WORK ON THE MONTESSORI BUILDINGS, TO WORK ON
3 THE WILL OF GOD FOCUS AND THE OTHER RENOVATIONS THAT WE HAD
4 ON THE EXISTING FACILITIES.

5 Q NOW, LET ME SEE IF I UNDERSTAND THIS CORRECTLY.
6 MR. MULL WAS ASKED TO COME THERE AND DO SOME WORK ON THE
7 EXISTING BUILDINGS. AND IN ORDER TO DO THIS, HE WAS
8 SUPPOSED TO GIVE UP HIS BUSINESS IN SAN FRANCISCO, SELL HIS
9 HOME, FOREGO ANY EARNINGS AND JUST COME TO THE CHURCH TO
10 WORK ON THE RENOVATION OF THE EXISTING BUILDINGS; IS THAT
11 CORRECT?

12 MR. KLEIN: OBJECTION. COMPOUND QUESTION, YOUR
13 HONOR.

14 THE COURT: OVERRULED.

15 THE WITNESS: YOU MENTIONED SO MANY THINGS I CAN'T
16 REMEMBER ALL OF THEM. I MEAN YOU MENTIONED ABOUT FOUR OR
17 FIVE THINGS. I WOULD BE HAPPY TO REFER TO THEM.

18 FIRST THING YOU ASKED ME IS WAS HE ASKED TO
19 SELL HIS HOME OR THAT WAS ONE OF THE THINGS. HE WAS NOT
20 ASKED TO SELL HIS HOME. HE INFORMED ME THAT HE WAS
21 INTENDING TO SELL HIS HOME.

22 YOU ASKED ME IF HE WAS ASKED TO CLOSE DOWN HIS
23 BUSINESS. HE WAS TOLD AFTER HE ARRIVED THAT HE WOULD HAVE
24 TO BE PREPARED TO KEEP HIS BUSINESS GOING TO SUPPORT HIMSELF
25 FINANCIALLY EITHER IN SAN FRANCISCO OR IN THE AREA OF
26 CAMELOT.

27 I CAN'T REMEMBER THE OTHER PARTS OF WHAT YOU
28 ASKED ME, BUT I WILL BE HAPPY TO RESPOND.

1 Q BY MR. LEVY: I'D LIKE YOU TO TELL ME WHAT THE
2 DISCUSSION THAT YOU HAD WITH MR. MULL ENCOMPASSED WITH
3 REGARD TO HIS COMING TO CAMELOT.

4 A WHICH DISCUSSION? THE ONE ON THE PHONE?

5 Q WAS THERE ONE IN PERSON BEFORE HE CAME TO
6 CAMELOT?

7 A NO.

8 Q SO IT WOULD PRETTY MUCH HAVE TO BE THE ONE ON
9 THE TELEPHONE.

10 A OKAY. THE ONE ON THE TELEPHONE, I, AS I SAID
11 BEFORE, I ASKED -- I TOLD HIM THAT WE WERE INVITING HIM TO
12 COME DOWN AND VOLUNTEER AS -- ON THE STAFF TO DO
13 ARCHITECTURE WORK AT CAMELOT AND WOULD -- WOULD HE LIKE TO
14 DO THAT? AND HE SAID YES, HE WOULD.

15 Q THAT WAS THE WHOLE CONVERSATION?

16 A HE SAID THAT HE WOULD HAVE TO HAVE HIS EXPENSES
17 MET, HE WOULD HAVE TO BE SURE THAT HIS EXPENSES COULD BE
18 MET.

19 AND I SAID, "WHAT ARE YOUR EXPENSES?"

20 HE SAID HE WASN'T SURE EXACTLY WHAT THEY ARE.
21 HE WOULD HAVE TO FIGURE THEM OUT.

22 I SAID, "WELL, WHAT IS THE TIME FRAME THAT WE
23 ARE TALKING ABOUT?"

24 AND HE SAID THAT HE HAD A NUMBER OF THINGS THAT
25 COULD POSSIBLY MEET HIS EXPENSES SO HE COULD COME SOONER
26 THAN LATER. AND THOSE INCLUDED THE CONCEPT OF THE FACT THAT
27 HE WAS APPLYING FOR A NEW LOAN ON HIS HOUSE, WHICH COULD
28 HELP MEET THOSE EXPENSES.

1 HE HAD EXISTING CLIENTS THAT OWED HIM CERTAIN
2 SUMS OF MONEY AS WELL AS CURRENT PROJECTS THAT HE WOULD BE
3 OBLIGED TO KEEP GOING. AND THAT THOSE THINGS WOULD GO A
4 LONG WAY TOWARDS MEETING HIS EXPENSES.

5 WE DISCUSSED THE TIME FRAME AGAIN, AND WE BOTH
6 AGREED THAT WE'D LIKE HIM TO COME SOONER THAN LATER AND HE'D
7 LIKE TO COME. SO HE SUGGESTED THAT SINCE HE WAS PLANNING TO
8 SELL HIS HOUSE, IF HE DID COME AND IF INDEED HIS EXPENSES
9 WERE NOT MET BY THE THINGS I JUST MENTIONED, THAT PERHAPS
10 THE CHURCH COULD LOAN HIM THE FUNDS TO MAKE UP THE
11 DIFFERENCE AND HE WOULD REPAY THE CHURCH UPON THE SALE OF
12 HIS HOUSE.

13 AND FOR -- WE OFFERED -- I TOLD HIM THAT I
14 COULDN'T COMMENT ON THAT. I WAS -- THAT CONVERSATION WAS TO
15 GATHER THE FACTS ABOUT WHAT HIS CIRCUMSTANCES WERE AND TO
16 REPORT BACK TO THE BOARD. BUT THAT WE WOULD BE WILLING TO
17 PAY HIS ROOM AND BOARD AS WELL AS HIS TRANSPORTATION, HIS
18 AIR FARE AND SO FORTH BACK AND FORTH TO SAN FRANCISCO SO HE
19 COULD KEEP THOSE OTHER JOBS GOING.

20 Q WHAT ABOUT HIS EXPENSES ON HIS PROPERTY AND HIS
21 HOME AND HIS BUSINESS BACK IN SAN FRANCISCO? WAS THAT GOING
22 TO BE PART OF WHAT YOU WERE GOING TO PAY?

23 A WELL, HE JUST -- WHATEVER HIS PERSONAL EXPENSES
24 WERE.

25 Q DID THAT INCLUDE THE NOTE ON HIS HOME IN SAN
26 FRANCISCO AND HIS ONGOING EXPENSES THERE?

27 A YES.

28 Q SO IF I UNDERSTAND CORRECTLY, YOU SAID, "THE

1 CHURCH WILL PAY YOUR EXPENSES FOR ALL OF YOUR ONGOING
2 EXPENSES BACK IN SAN FRANCISCO, WE WILL SUPPLY YOU WITH ROOM
3 AND BOARD, WE WILL PAY FOR YOUR TRANSPORTATION BACK AND
4 FORTH TO SAN FRANCISCO."

5 NOW, WAS THE CHURCH GOING TO PAY FOR HIS
6 TRANSPORTATION BACK AND FORTH FOREVER?

7 A FOREVER IS A LONG TIME.

8 Q WELL, YOU WERE THE ONE WHO MADE THE DEAL WITH
9 HIM. HOW LONG WERE THEY GOING TO PAY HIS EXPENSES TO GO
10 BACK AND FORTH TO SAN FRANCISCO?

11 A DURING THE PERIOD OF TIME THAT HE WAS WORKING
12 ON STAFF, VOLUNTARY STAFF FOR US.

13 Q SO HE WAS GOING TO GIVE UP EVERYTHING HE HAD IN
14 SAN FRANCISCO AND YOU WOULD PAY HIS TRANSPORTATION BACK
15 DURING THE TIME THAT HE JUST VOLUNTEERED TO COME DOWN AND DO
16 THE WORK FOR YOU; IS THAT CORRECT?

17 MR. KLEIN: OBJECT. THAT MISCHARACTERIZES WHAT HE
18 SAID.

19 THE COURT: OVERRULED.

20 THE WITNESS: NO, HE WAS NOT GOING TO GIVE UP
21 EVERYTHING HE HAD.

22 Q BY MR. LEVY: HOW LONG DID YOU ANTICIPATE THAT
23 MR. MULL WAS GOING TO COME DOWN TO THE CHURCH AND WORK ON
24 THE RENOVATION OF EXISTING BUILDINGS?

25 A PERIOD OF MONTHS, A PERIOD OF MONTHS.

26 Q SO HE WAS ONLY GOING TO BE THERE FOR A PERIOD
27 OF MONTHS. ABOUT HOW LONG WAS THAT PERIOD OF MONTHS GOING
28 TO BE? ONE, TWO, SEVEN, FORTY-FIVE, EIGHTY-SIX? DO YOU

1 HAVE ANY IDEA WHAT THAT PERIOD OF MONTHS WAS GOING TO BE?

2 A I THINK WE KIND OF LEFT IT OPEN-ENDED. I DON'T
3 RECALL FIXING ANY TIME FRAME ON IT WITH GREGORY.

4 Q IN THE COURSE OF YOUR CONVERSATION, DID YOU
5 EVER ASK MR. GREGORY MULL IF HE WOULD LIKE TO BE THE
6 ARCHITECT OF THE NEW JERUSALEM?

7 A NO.

8 Q YOU NEVER THOUGHT OF ANYTHING LIKE THAT, DID
9 YOU?

10 A THE NEW -- CAMELOT WAS NOT THE NEW JERUSALEM.

11 Q OH? WHAT WAS CAMELOT?

12 A CAMELOT WAS CAMELOT. CAMELOT WAS THE PREMISES
13 IN CALABASAS.

14 Q IS MONTANA NOW THE NEW JERUSALEM?

15 A NO, NOT THAT I AM AWARE OF.

16 Q WELL, WHEN YOU TALK ABOUT THE TEN-YEAR PLAN,
17 YOU TALK ABOUT THE NEW JERUSALEM. WHERE IS THIS PLACE? IS
18 IT FICTIONAL OR MYSTICAL OR IS THERE ACTUALLY A PLACE?

19 MR. KLEIN: I AM GOING TO OBJECT. MISCHARACTERIZES
20 THE TESTIMONY OF THIS WITNESS.

21 THE COURT: OVERRULED.

22 THE WITNESS: MY UNDERSTANDING IS THAT THE NEW
23 JERUSALEM IS SPIRITUAL. IT IS A SPIRITUAL TERM THAT IS
24 REFERRED TO IN THE BOOK OF REVELATION. AND AT THE TIME THAT
25 I WAS THERE, THERE WERE ASSOCIATIONS BETWEEN THE NEW
26 JERUSALEM AND THE GENERAL LOS ANGELES AREA.

27 Q BY MR. LEVY: NOW I THINK I UNDERSTAND. MR.
28 MULL WAS ASKED TO COME DOWN AND DO SOME ARCHITECTURAL WORK

1 ON A SPIRITUAL PLACE.

2 WAS HE SUPPOSED TO CONJURE THIS UP IN HIS HEAD
3 OR WAS HE SUPPOSED TO PUT IT DOWN ON PAPER?

4 A I SAID HE WAS SUPPOSED TO COME DOWN AND WORK ON
5 THE MONTESSORI BUILDINGS, SUPPOSED TO COME DOWN AND WORK ON
6 THE WILL OF GOD FOCUS, SUPPOSED TO COME DOWN AND HELP US
7 WITH THE RENOVATIONS AT CAMELOT. THAT IS WHAT I SAID.

8 Q FOR HOW MANY --

9 THE COURT: THE NEW JERUSALEM, IS THERE A PLACE WHERE
10 A PERSON COULD GO TO THAT WOULD BE THE NEW JERUSALEM? IS
11 THAT THE IDEA?

12 THE WITNESS: NO, THAT WAS NOT THE IDEA.

13 THE COURT: SO THERE WAS NO SPECIFIC LOCATION THAT
14 YOU, FOR EXAMPLE, MR. SHEARER, MIGHT GO TO WHICH WOULD BE
15 THE LOCATION FOR THE NEW JERUSALEM?

16 THE WITNESS: WELL, AS I EXPLAINED EARLIER, I WAS
17 ARCHBISHOP OF THE NEW JERUSALEM. AND MY UNDERSTANDING OF
18 THAT OFFICE WAS THAT IT WAS BEING RESPONSIBLE FOR ALL OF OUR
19 MEMBERS WHO LIVED IN THE GREATER LOS ANGELES AREA.

20 THE COURT: BUT WAS IT A PHYSICAL PLACE?

21 THE WITNESS: NO.

22 THE COURT: OKAY. THAT IS ALL I WANTED TO KNOW. IT
23 WASN'T AN AREA.

24 THE WITNESS: WASN'T A PLACE THAT HAD AN ADDRESS THAT
25 YOU COULD MAIL A LETTER TO.

26 THE COURT: OKAY. THAT HELPS.

27 IS THIS A CONVENIENT TIME TO TAKE OUR MORNING
28 RECESS?

1 MR. LEVY: YES, IT IS.

2 (RECESS.)

3 THE COURT: PLEASE PROCEED.

4 MR. LEVY: THANK YOU, YOUR HONOR.

5 Q JUST BEFORE THE BREAK, MR. SHEARER, WE WERE
6 TALKING ABOUT THE NEW JERUSALEM. IF I RECALL CORRECTLY, YOU
7 SAID IT WAS A MYSTICAL PLACE, IT WAS NOT AN ACTUAL LOCATION
8 THAT YOU COULD SEND A LETTER TO?

9 A THAT'S CORRECT.

10 Q IN YOUR TEACHINGS -- WHEN I SAY "YOU," I AM
11 REFERRING TO THE CHURCH'S TEACHINGS -- WAS THERE EVER A PLAN
12 TO DEVELOP A NEW JERUSALEM AT CAMELOT?

13 A NO.

14 Q DID YOU RAISE THE MONEY TO DO THE DEVELOPMENTAL
15 PLAN OF THE ARCHITECTURAL FIRM THAT YOU TOLD US ABOUT? DID
16 YOU RAISE MONEY FOR PURPOSES OF BUILDING CAMELOT IN TERMS OF
17 WHAT THAT ARCHITECTURAL FIRM LAID OUT FOR YOU?

18 A WE RAISED MONEY AND WE USED THEIR DRAWINGS AS A
19 CONCEPT OF HOW THE PREMISES MIGHT LOOK.

20 Q WAS THE IMMEDIATE GOAL THAT OF RAISING \$7
21 MILLION FOR CAMELOT SO THAT YOU COULD GET ON WITH THE
22 BUILDING PROJECT THERE?

23 A WELL, AS I RECALL, A GOOD PORTION OF THAT MONEY
24 WAS TO PURCHASE THE PROPERTY. AND WHATEVER EXCESS MONIES
25 WERE LEFT OVER AFTER WE HAD PURCHASED IT WOULD BE USED
26 TOWARDS CONSTRUCTION, RENOVATION.

27 Q TRY TO HELP ME TO UNDERSTAND IF YOU WILL. YOU
28 TOLD THE PEOPLE YOU WERE GOING TO DEVELOP A NEW CAMELOT

1 ACCORDING TO THE BROCHURE. THEN YOU USED THE MONEY TO
2 ACQUIRE THE PROPERTY, NOT TO DEVELOP IT ACCORDING TO THE
3 BROCHURE?

4 A OBVIOUSLY YOU HAVE TO HAVE THE PROPERTY IF YOU
5 ARE GOING TO BUILD ANYTHING ON IT. AND --

6 Q WHAT WAS THE PURPOSE OF DEVELOPING THIS
7 BROCHURE, MR. SHEARER? WAS THIS A FRAUD AND A HOAX AND A
8 CON PERPETRATED UPON THE PEOPLE WHO YOU TRIED TO GET
9 CONTRIBUTIONS FROM?

10 A IT WAS NOT A FRAUD, IT WAS NOT A HOAX, IT WAS
11 NOT A CON.

12 Q DID YOU INTEND TO BUILD THE BUILDINGS THAT THIS
13 BROCHURE REPRESENTS?

14 A THAT WAS OUR LONG-RANGE PLAN AT THE TIME THAT
15 THE BROCHURE WAS DONE.

16 Q WHEN YOU SAY "LONG-RANGE," YOU MEAN TEN YEARS?

17 A YES.

18 Q THAT WAS YOUR TEN-YEAR PLAN. I NOTE IN THIS
19 BROCHURE -- YOU ARE FAMILIAR WITH THIS BROCHURE, ARE YOU
20 NOT?

21 A WELL, I HAVEN'T SEEN IT IN ABOUT FOUR YEARS.

22 Q BUT YOU SAW IT QUITE A BIT BEFORE YOU LEFT THE
23 CHURCH, DID YOU NOT?

24 A YES.

25 Q IT IS COPYRIGHTED IN 1978. WAS IT NOT IN 1978,
26 PRIOR TO ASKING MR. MULL TO COME TO CAMELOT, THAT THE CHURCH
27 FOUND OUT FROM THE COASTAL COMMISSION THAT THEY COULD NOT
28 DEVELOP THE PROPERTY ACCORDING TO WHAT IS LAID OUT IN THIS

1 BROCHURE?

2 A THERE WAS NO CATEGORICAL DENIAL ON THE PART OF
3 THE COASTAL COMMISSION, NO.

4 Q YOUR TESTIMONY NOW IS CONTRARY TO WHAT
5 ELIZABETH CLARE PROPHET TOLD US WHEN SHE WAS ON THE STAND?

6 A IT IS --

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

9 THE COURT: OVERRULED.

10 THE WITNESS: MY UNDERSTANDING THAT WE DISCOVERED
11 THAT WE MIGHT BE UNDER THE JURISDICTION OF THE COASTAL
12 COMMISSION. WE DEFINITELY TALKED TO VARIOUS PEOPLE ABOUT
13 THE FACT THAT THERE ARE THINGS YOU CAN DO WITHIN THE
14 BOUNDARIES OF THAT, BEING IN THE COASTAL COMMISSION.

15 AS A MATTER OF FACT, THERE WERE SEVERAL PEOPLE
16 IN THE AREA WHO WERE GETTING UP GROUPS TO ARGUE THAT IN FACT
17 THE -- WHERE THEY HAD DRAWN THE LINE FOR THE COASTAL
18 COMMISSION WAS IMPROPERLY DRAWN AND THERE WERE DEFINITELY
19 TWO SIDES TO THE WHOLE QUESTION.

20 IT WAS SUPPOSED TO BE THE FIRST RIDGE TOP FROM
21 THE OCEAN AND INSTEAD THEY WERE EXTENDING IT SIX MILES
22 INLAND. SO THERE WERE DEFINITELY ARGUMENTS TO THE CONTRARY,
23 THAT IT WAS NOT A PART OF THE COASTAL COMMISSION IN THE
24 FIRST PLACE.

25 Q BY MR. LEVY: I REMEMBER SPECIFICALLY WHAT YOU
26 TESTIFIED TO THIS MORNING ABOUT YOUR CONVERSATIONS WITH
27 GREGORY MULL.

28 WHY WAS IT THAT YOU DID NOT TELL HIM IN THOSE

1 CONVERSATIONS THAT WERE FOR HIM TO MAKE A DETERMINATION AS
2 TO WHETHER HE WANTED TO GO THERE AND HELP REFURBISH
3 BUILDINGS, WHY DID YOU NOT TELL HIM THAT THERE WAS A PROBLEM
4 OR MAY BE A PROBLEM WITH THE COASTAL COMMISSION AND MAYBE
5 NOTHING NEW COULD BE BUILT THERE?

6 A BECAUSE I DIDN'T BELIEVE THAT NOTHING NEW COULD
7 BE BUILT THERE.

8 Q YOU DIDN'T FEEL IT WAS FAIR TO DISCUSS WITH A
9 MAN WHO MIGHT BE GIVING UP HIS BUSINESS OR SELLING HIS HOME
10 OR COMING TO CAMELOT AT AN ENORMOUS EMOTIONAL, FINANCIAL
11 COST, YOU DIDN'T FEEL IT WAS FAIR TO DISCUSS THAT WITH HIM,
12 DID YOU?

13 MR. KLEIN: YOUR HONOR, I WOULD OBJECT. ASSUMES
14 FACTS NOT IN EVIDENCE.

15 THE COURT: OVERRULED.

16 THE WITNESS: I HAVE STATED THAT WE WOULD FINALIZE
17 THE ARRANGEMENTS WHEN GREGORY GOT TO THE PROPERTY. AND I
18 DON'T SEE HOW HE COULD HAVE CONSTRUED PREVIOUS TO THAT TIME
19 TO SELL HIS BUSINESS, ET CETERA, ALL THE OTHER THINGS THAT
20 YOU SAID.

21 Q BY MR. LEVY: YOU DON'T SEE HOW HE COULD DO
22 THAT. WHAT ABOUT I WILL SELL YOU MY CAR, BUT I AM GOING TO
23 TAKE THE ENGINE OUT, BUT I AM NOT GOING TO TELL YOU ABOUT
24 IT, AFTER YOU GIVE ME THE MONEY, THEN WE WILL TALK ABOUT THE
25 ENGINE.

26 ISN'T THAT SOMEWHAT THE SAME THING, MR.
27 SHEARER?

28 A NO, NOT AT ALL.

1 Q NO, NOT AT ALL.

2 WHEN DID YOU FIRST START --

3 A WE WENT VERY FAR WITH -- WE PROCEEDED QUITE A
4 WAYS WITH THE MONTESSORI BUILDING.

5 Q WEREN'T THOSE SOME QUONSET HUTS THAT THE CHURCH
6 HAD PURCHASED THAT MR. MULL WORKED ON TO -- YOU PROCEEDED
7 QUITE FAR WITH, WERE THEY NOT OLD QUONSET HUTS THAT THE
8 CHURCH PURCHASED?

9 A WITH A HUT ADDED ONTO IT, YES.

10 Q SO MR. MULL GAVE UP EVERYTHING HE HAD TO COME
11 TO CAMELOT TO WORK ON SOME QUONSET HUTS THAT YOU PURCHASED
12 FOR THE MONTESSORI SCHOOL?

13 A I HAVE ANSWERED ABOUT THREE TIMES THAT IT WAS
14 NOT TO HAVE HIM GIVE UP EVERYTHING HE HAD. I HAVE STATED
15 OVER AND OVER AGAIN THAT IS NOT THE CASE.

16 Q YOU HAVE STATED OVER AND OVER.

17 IN THE COURSE OF YOUR MANY CONVERSATIONS WITH
18 MR. MULL WHEN HE WAS AT CAMELOT, WAS IT YOUR POLICY TO STATE
19 OVER AND OVER YOUR POSITION?

20 A YES. AND IT WAS STATED TO HIM DIRECTLY THAT HE
21 WOULD HAVE TO BE PREPARED TO SUPPORT HIMSELF FINANCIALLY
22 EITHER AROUND CAMELOT OR IN THE SAN FRANCISCO AREA BEYOND
23 THE TIME IT WOULD TAKE US TO DO THE MONTESSORI BUILDINGS AND
24 THE TIME IT WOULD TAKE TO DO ANY OTHER IMMEDIATE RENOVATION
25 PROJECTS THAT WE HAD IN THE NEAR FUTURE.

26 Q ARE YOU AWARE THAT IT WAS ELIZABETH CLARE
27 PROPHET WHO SENT A MEMORANDUM TO GREGORY MULL TELLING HIM IT
28 WAS TIME NOW TO PUT HIS HOUSE UP FOR SALE AND TO GET IT DONE

1 RIGHT NOW?

2 MR. KLEIN: I AM GOING TO OBJECT. IT
3 MISCHARACTERIZES THE TESTIMONY, YOUR HONOR.

4 THE COURT: HE CAN ANSWER.

5 THE WITNESS: AS I RECALL, THAT WAS TRANSMITTED
6 THROUGH ME IN A MEMO THAT I TOLD HIM -- THAT I GAVE TO HIM
7 IN THE CONTEXT THAT IF WE WERE GOING TO LOAN HIM ANY MONEY
8 WITH THE UNDERSTANDING THAT HE REPAID IT ON THE SALE OF HIS
9 HOUSE, THAT THAT ARRANGEMENT WOULD BE AGREED TO US IF HE
10 WOULD -- IF HE WANTED TO PUT HIS HOUSE ON THE MARKET
11 IMMEDIATELY. IF HE DIDN'T WANT TO DO THAT, WE WERE NOT IN A
12 POSITION TO KEEP LOANING HIM MONEY.

13 Q BY MR. LEVY: HE WAS GOING TO BE THERE A MATTER
14 OF MONTHS. HE WAS GOING TO WORK ON HIS QUONSET HUTS. AND
15 IN ORDER TO DO THIS FOR THIS SEVERAL MONTH PERIOD, YOU SENT
16 HIM A MEMO TELLING HIM THAT HE HAD OR SHOULD PUT HIS HOUSE
17 UP FOR SALE TO TAKE CARE OF THE LOAN FOR SOME SEVERAL
18 MONTHS; IS THAT CORRECT?

19 A YES. ONE OF THE LETTERS GREGORY SENT US, HE
20 SAID THAT HE HAD BEEN PLANNING TO SELL HIS HOUSE FOR MONTHS
21 BEFORE HE EVER -- BEFORE I EVER CALLED HIM. SO IT WAS ONLY
22 A QUESTION OF THE TIMING.

23 Q IS THE MONTESSORI SCHOOL COMPLETE AT THE
24 PRESENT TIME?

25 A I HAVEN'T BEEN THERE FOR FOUR YEARS. BUT WHEN
26 I LEFT, WE HAD NOT COMPLETED A NEW STRUCTURE CALLED
27 MONTESSORI SCHOOL.

28 Q WHEN DID YOU LEAVE?

1 A IN 1981.

2 Q AFTER GREGORY LEFT?

3 A YES.

4 Q WAS NOT YOUR AGREEMENT THEN THAT YOU WERE
5 SUPPOSED TO SUPPORT HIM UNTIL HE COMPLETED AT LEAST THE
6 MONTESSORI SCHOOL?

7 A I SAID UNTIL OUR WORK WAS DONE ON IT WITH THE
8 MONTESSORI.

9 Q OH. AND ARE YOU AN ARCHITECT AND YOU KNOW WHEN
10 THE WORK IS DONE ON THE MONTESSORI? DO YOU HAVE ANY
11 ARCHITECTURAL TRAINING?

12 A NO, I DON'T HAVE ARCHITECTURAL TRAINING.

13 Q AND YOU WERE GOING TO MAKE THE DECISION AS TO
14 WHEN IT WOULD BE TIME FOR GREGORY TO LEAVE WHEN YOU WERE ALL
15 DONE?

16 A WHEN THE CHURCH'S WORK ON THAT PROJECT WAS
17 COMPLETED, WHATEVER THAT WORK MIGHT BE, THAT WAS THE LENGTH
18 OF TIME THAT WE WERE OFFERING TO HIM AS THE DEGREE OF OUR
19 COMMITMENT TO HIM. IF HE DID NOT LIKE THAT ARRANGEMENT, HE
20 WAS FREE TO DO WHATEVER HE WANTED TO DO.

21 Q IN 1970 --

22 A HE DIDN'T HAVE TO ACCEPT IT.

23 Q GREGORY MULL WENT THROUGH SUMMIT UNIVERSITY?

24 A I AM SORRY, DID YOU SAY 1980?

25 Q I SAID DID GREGORY MULL, TO YOUR KNOWLEDGE, GO
26 THROUGH SUMMIT UNIVERSITY?

27 A YES.

28 Q WAS GREGORY MULL ASKED TO BECOME PERMANENT

1 STAFF?

2 A THE TOPIC CAME UP WITH HIM, YES.

3 Q THE TOPIC CAME UP.

4 DID IT JUST BOB UP BY ITSELF OR WERE YOU THE
5 ONE WHO BROUGHT THE TOPIC UP WITH HIM?

6 A I DON'T -- I DON'T RECALL BRINGING UP THE
7 TOPIC.

8 Q DID MR. MULL SAY, "CAN I BECOME PERMANENT STAFF
9 SO I CAN GIVE ALL OF MY REAL PROPERTY AND PERSONAL PROPERTY
10 TO THE CHURCH?" IS THAT THE WAY IT HAPPENED?

11 A WHAT I RECALL IS A CONVERSATION WITH GREGORY
12 ABOUT WHAT IT MEANT TO BE A PERMANENT STAFF MEMBER.

13 Q WHAT DOES IT MEAN TO BE A PERMANENT STAFF
14 MEMBER?

15 A IT MEANS TO GIVE YOUR ALL TO THE CHURCH BECAUSE
16 YOU BELIEVE IN IT WITH THE UNDERSTANDING THAT THE CHURCH IS
17 LIKewise COMMITTING ITSELF TO YOU.

18 Q IN YOUR OPINION, DID --

19 A AND --

20 Q -- GREGORY MULL BELIEVE IN THE CHURCH?

21 A YES.

22 Q YOU CALLED, HE CAME, RIGHT?

23 A YES.

24 Q IF HE BELIEVED TO THAT EXTENT, DO YOU, AS ONE
25 OF THE BOARD OF DIRECTORS IN THE CHURCH AND ONE OF THE
26 DEFENDANTS IN THIS CASE, BELIEVE THAT YOU HAD AN OBLIGATION
27 TO DISCLOSE TO HIM ALL OF THE PERMANENT FACTORS AND
28 CONSIDERATIONS PRIOR TO HIM CLOSING DOWN HIS BUSINESS AND

1 GIVING UP HIS CAREER IN SAN FRANCISCO AND COMING TO CAMELOT?

2 A I AM SORRY, MR. LEVY, I WAS TRYING TO PAY VERY
3 CLOSE ATTENTION TO YOUR QUESTION. BY THE TIME YOU FINISHED,
4 I REALLY DON'T REMEMBER THE FIRST PART OF THE QUESTION.

5 Q LET ME TRY AGAIN. GREGORY MULL WAS A TRUE
6 BELIEVER IN YOUR CHURCH, WAS HE NOT?

7 A YES.

8 Q DO YOU BELIEVE, AS A MEMBER OF THE BOARD OF
9 DIRECTORS AND AS THE ARCHBISHOP OF THE CHURCH, THAT IT WOULD
10 HAVE BEEN EQUITABLE IF THE CHURCH HAD DISCLOSED TO MR. MULL
11 ALL OF THE CONSIDERATIONS PRIOR TO ASKING HIM TO COME TO
12 CAMELOT AND BE THE ARCHITECT THERE?

13 A YOU HAVE TO OPEN NEGOTIATIONS, YOU HAVE TO OPEN
14 THE DISCUSSIONS SOMEWHERE. I HAVE STATED THAT THE DECISION
15 WAS POSTPONED UNTIL HIS ARRIVAL SO WE COULD DISCUSS THINGS
16 IN PERSON. AND THOSE DISCLOSURES WERE MADE BEFORE THE FINAL
17 DECISION WAS MADE. IT WOULDN'T HAVE BEEN RIGHT TO SETTLE
18 THE WHOLE THING LONG DISTANCE IN ONE OR TWO PHONE CALLS.

19 Q DID MR. MULL WRITE THE BOARD OF DIRECTORS A
20 LETTER IN FEBRUARY OF 1979, ABOUT A MONTH AND A WEEK AFTER
21 HE CAME TO CAMELOT, DID HE WRITE YOU A LETTER -- I AM
22 SHOWING THE WITNESS EXHIBIT NUMBER 28.

23 DID HE WRITE YOU A LETTER AND SET OUT ALL OF
24 THE FACTS AND ALL OF THE CIRCUMSTANCES AND ALL OF THE
25 CONSIDERATIONS THAT HE UNDERSTOOD TO BE THE STATE OF AFFAIRS
26 BEFORE HE COULD ENTER INTO ANY PERMANENT AGREEMENT WITH YOU?

27 YOU'VE SEEN THE LETTER, HAVE YOU NOT?

28 A I DON'T KNOW WHAT HE UNDERSTOOD. HE DID WRITE

1 THIS LETTER, YES.

2 Q WELL, AT THE TIME HE WROTE THE LETTER AND HE
3 SAID HE COULDN'T DO CERTAIN THINGS UNLESS THE CHURCH AGREED
4 TO CERTAIN THINGS, WHY DIDN'T YOU TELL HIM IN FEBRUARY OF
5 1979 THAT YOU WEREN'T GOING TO DO WHAT HE REQUESTED?

6 A BECAUSE WE HAD TO EVALUATE WHAT HE WAS
7 SUGGESTING. WE HAD TO MAKE A DECISION ON IT.

8 Q OH, I SEE. AND IT TOOK YOU UNTIL MAY OF 1980
9 TO MAKE YOUR DECISION, DID IT?

10 A MARCH OF 1979.

11 Q MARCH --

12 A SOMETIME MID-MARCH, 1979, HE WAS INFORMED.

13 Q WHY THEN ON ALL OF THE PAYMENTS TO GREGORY MULL
14 FROM JANUARY THROUGH SEPTEMBER DOES IT LIST THAT THE PAYMENT
15 IS FOR ARCHITECTURAL WORK?

16 THERE IS NOT ONE WORD ON ANY CHECK THAT WAS
17 PAID TO HIM THAT SAYS THIS IS A LOAN. YOU ARE A BOARD OF
18 DIRECTOR. YOU ARE THE EXECUTIVE COMMITTEE. YOU ARE THE
19 ARCHBISHOP OF THE CHURCH.

20 WHY DON'T THE RECORDS REFLECT THAT THE MONEY
21 THAT WAS PAID TO MR. MULL WAS A LOAN AS OPPOSED TO PAYMENT
22 FOR ARCHITECTURAL WORK?

23 A THE RECORDS DO REFLECT IT IN THE TWO NOTES THAT
24 HE SIGNED.

25 Q OH. BUT FOR THE FIRST NINE MONTHS ON THE
26 CHECKS THAT WERE ACTUALLY HANDED TO HIM, NOT ONE WORD ABOUT
27 LOAN?

28 A I DIDN'T PREPARE THOSE CHECKS.

1 Q I KNOW. WHEN I TALKED TO THE GUY WHO DID, HE
2 DIDN'T HAVE SOMETHING TO DO WITH IT EITHER. IT WAS ALWAYS
3 SOMEBODY ELSE, MR. SHEARER. IT WAS ALWAYS SOMEBODY ELSE.

4 MR. KLEIN: I AM GOING TO OBJECT. THAT
5 MISCHARACTERIZES THE TESTIMONY. THE OTHER WITNESS DIDN'T
6 SAY HE PREPARED THEM EITHER.

7 Q BY MR. LEVY: THAT'S RIGHT. THE TREASURER. HE
8 DIDN'T KNOW ANYTHING EITHER, DID HE?

9 YOU TALKED ABOUT A CATHEDRAL THAT MR. MULL HAD
10 TALKED ABOUT BUILDING. DO YOU REMEMBER WHETHER OR NOT THERE
11 WAS ANY DISCUSSIONS BETWEEN YOURSELF OR ANY COMMUNICATIONS
12 BETWEEN YOURSELF AND MR. MULL WITH REGARD TO A CATHEDRAL
13 THAT YOU TESTIFIED HE WANTED TO BUILD FOR THE CHURCH?

14 DO YOU REMEMBER ANY COMMUNICATIONS WITH REGARD
15 TO THAT?

16 A I CAN'T REMEMBER ANY COMMUNICATION.

17 Q LET ME HELP YOUR RECOLLECTION. HERE IS A
18 LETTER DATED JANUARY OF 1978 -- IT IS EXHIBIT NUMBER 21,
19 YOUR HONOR -- WHERE MR. MULL WROTE TO YOU. YOUR NAME IS
20 INCLUDED RIGHT ON THE TOP, REVEREND MONROE SHEARER.

21 YOU'VE SEEN THAT DOCUMENT, HAVEN'T YOU?

22 A YES.

23 Q IT IS A PRETTY DOGGONE DETAILED DOCUMENT, ISN'T
24 IT? IT TELLS WHAT WILL BE REQUIRED IF THE CHURCH WANTS TO
25 BUILD THIS CATHEDRAL, DOES IT NOT?

26 A I DON'T KNOW IF THAT IS IN FACT WHAT WOULD BE
27 REQUIRED. IT MAKES AN ATTEMPT TO BE DETAILED, YES.

28 Q AND ON THE BOTTOM OF THE DOCUMENT, IT DISCUSSES

1 SOME OF THE THINGS THAT THE CHURCH WILL HAVE TO DO AND WHAT
2 IT DISCUSSES IS IN RESPONSE TO A PRIOR CONVERSATION, ISN'T
3 IT?

4 GO AHEAD AND READ THE LETTER, MR. SHEARER. IT
5 IS ADDRESSED TO YOU.

6 IS IT STILL YOUR TESTIMONY AT THIS POINT THAT
7 THERE WAS NO PRIOR COMMUNICATIONS OR NO DISCUSSION WITH
8 CHURCH OFFICIALS ABOUT A CATHEDRAL? IT WAS JUST MR. MULL'S
9 IDEA TO BUILD A CATHEDRAL SOMEWHERE?

10 A I REMEMBER VERY CLEARLY THE VERY FIRST TIME
11 THAT THE IDEA OF A CATHEDRAL CAME UP. IT CAME UP AT THE
12 ASHRAM IN LOS ANGELES WHEN GREGORY PRESENTED US WITH A
13 PROPOSAL FOR THIS CATHEDRAL AND I REMEMBER AT THE TIME VERY
14 CLEARLY THAT IT WAS OUT OF THE BLUE.

15 IT WAS THE VERY FIRST TIME WE HAD EVER HEARD
16 ABOUT IT. AND WE HAD THE, YOU KNOW, WE WERE NOT IN A
17 POSITION TO COMMENT ON IT WHEN WE FIRST GOT IT.

18 THE SEQUENCE OF EVENTS AS TO WHEN THIS LETTER
19 CAME IN CONJUNCTION WITH THAT, I DON'T RECALL. BUT I DO
20 REMEMBER THAT THAT PRESENTATION AT THE ASHRAM WAS THE VERY
21 FIRST TIME THAT IT WAS BROUGHT UP.

22 Q WASN'T IT PART OF YOUR UNDERSTANDING WITH
23 GREGORY MULL THAT IF HE WOULD COME TO CAMELOT AND WORK
24 FULL-TIME FOR THE CHURCH, THAT HE WOULD IN FACT DISCONTINUE
25 HIS PERSONAL BUSINESS IN SAN FRANCISCO?

26 A NO, IT WAS NOT.

27 Q NO, IT WAS NOT.

28 JANUARY 23RD, 1979, EXHIBIT NUMBER 24. HERE IS

1 A LETTER ADDRESSED TO MONROE SHEARER.

2 DID YOU EVER SEE THIS LETTER, MR. SHEARER? I
3 WONDER IF YOU'D BE KIND ENOUGH TO READ THE SECOND PARAGRAPH
4 TO THE COURT.

5 A (READING.)

6 "I AM IN THE PROCESS OF CUTTING
7 MYSELF FREE OF ALL FOLLOW-UP BUSINESS IN SAN
8 FRANCISCO. HAD AN APPLICATION IN FOR A -- I
9 HAD AN APPLICATION IN FOR A SECOND MORTGAGE
10 LOAN WITH MY BANK AND IT WAS TO BE APPROVED
11 AND CONFIRMED EARLY MONDAY MORNING SO I
12 COULD CONSOLIDATE MY BILLS -- IT WOULD HAVE
13 BEEN DEPOSITED IN MY ACCOUNT WITHIN THREE
14 DAYS. IT WAS DENIED BECAUSE THE APPRAISER
15 CAME IN WITH A LOW APPRAISAL. I THEN DROVE
16 14 MILES TO MY MORTGAGE LOAN COMPANY TO
17 REFINANCE MY HOME WITH THEM -- THEY REQUIRED
18 A PAST INCOME TAX RETURN THAT I HAD TO DRIVE
19 AND GET."

20 MR. KLEIN: CONSISTENT WITH OUR ENTIRE POLICY, I
21 WOULD SUGGEST THAT THE ENTIRE LETTER BE READ. WE HAVE DONE
22 THAT ALL ALONG.

23 THE COURT: WHOSE POLICY, MR. KLEIN?

24 MR. KLEIN: IT WASN'T MY POLICY, BUT WE HAVE DONE IT,
25 YOUR HONOR. I THINK COUNSEL HAS REQUESTED IT THE WHOLE TIME
26 AND I HAVE READ THE WHOLE LETTER.

27 MR. LEVY: PLEASE READ THE FIRST PARAGRAPH, TOO.

28 THE WITNESS: (READING.)

1 "I WANT YOU TO KNOW HOW
2 GRATEFUL I AM TO BE HERE. DESIGNS ARE
3 FLOWING THROUGH ME AND IT IS A CREATIVE JOY.
4 MY JOB IS TO SURRENDER MY WILL AND GIVE MY
5 HEART TO SERAPIS BEY, JESUS, PAUL THE
6 VENETIAN AND ALL CONCERNED WITH CAMELOT.
7 THEN MY HEAD WILL BE FILLED AND MY HAND WILL
8 BE BUSY."

9 MR. KLEIN: THERE IS A LAST PARAGRAPH, ALSO.
10 THE WITNESS: (READING.)

11 "IT WILL BE PAID OFF IN THREE
12 WEEKS IF APPROVED. WITH THIS ADDITIONAL
13 BUSINESS I ARRIVED AT CAMELOT AFTER 1:00
14 A.M. TODAY. IF THIS IS TURNED DOWN I
15 PROBABLY WILL PUT MY HOME ON THE MARKET FOR
16 SALE. I HAVE NOT HAD NEW JOBS SINCE THE
17 BEGINNING OF DECEMBER WHICH WAS THE MASTERS
18 WAY OF FREEING ME FOR CAMELOT. I HAVE A
19 MORTGAGE AND TEMPORARY CAR LOAN PAYMENT
20 AMOUNTING TO \$1,400 WHICH I DON'T HAVE. MY
21 BANK ACCOUNT IS A BALANCE OF \$45. COULD YOU
22 ISSUE ME A CHECK FOR THIS AMOUNT SO I AM
23 COVERED. I MUST MAIL BOTH PAYMENTS FROM
24 CAMELOT TOMORROW. I FEEL IT WAS OPPOSITION
25 THAT I DID NOT GET THE LOAN FROM THE
26 HIBERNIA BANK, BUT THEN I CANNOT FULLY JUDGE
27 WHAT THE ASCENDED MASTERS HAVE IN STORE FOR
28 MY. I AM SORRY TO HAVE TO ASK FOR MONEY AT

1 THIS TIME ESPECIALLY WHEN CLIENTS SHOULD BE
2 SUPPLYING THIS.

3 "I THANK YOU FOR YOUR HELP AT
4 THIS TIME.

5 "MOST SINCERELY, GREGORY MULL."

6 Q BY MR. LEVY: DID YOU KNOW THAT GREGORY MULL,
7 IN ORDER TO COME TO CAMELOT IN ORDER TO BE THE ARCHITECT,
8 WAS GOING TO DISCONTINUE HIS BUSINESS IN SAN FRANCISCO?

9 A MY UNDERSTANDING WITH GREGORY IS THAT HE HAD
10 EXISTING CLIENTS.

11 Q THAT IS A SIMPLE QUESTION, MR. SHEARER. YOU
12 CAN ANSWER IT YES OR NO.

13 A WOULD YOU REPEAT THE QUESTION ONE MORE TIME?
14 DID I KNOW HE WAS GOING TO DISCONTINUE HIS BUSINESS?

15 Q WASN'T IT PART OF THE TERMS AND CONDITIONS THAT
16 YOU WOULD PAY FOR HIS TRIPS BACK AND FORTH TO SAN FRANCISCO
17 WHILE HE WAS CLOSING HIS BUSINESS DOWN?

18 A YOU COULD SAY THAT IF YOU WANTED TO.

19 Q NO. I AM ASKING YOU WHAT YOU WOULD SAY?

20 A I WOULDN'T SAY IT QUITE LIKE THAT.

21 Q WHY DON'T YOU TELL US QUITE HOW YOU WOULD SAY
22 IT?

23 A HE WAS BEING PAID THAT MONEY TO GO BACK AND
24 FORTH TO SAN FRANCISCO TO FULFILL THE OBLIGATIONS ON THE
25 JOBS THAT HE HAD PENDING THERE.

26 Q HE WAS BEING PAID THAT MONEY, HE WAS NOT BEING
27 LOANED THAT MONEY. WAS THAT A SLIP?

28 A THE MONEY TO TRANS -- TO GO BACK AND FORTH WAS

1 A FLAT-OUT PAYMENT TO HIM.

2 Q WHAT ABOUT THE ROOM AND BOARD? WAS THAT A
3 FLAT-OUT PAYMENT?

4 A YES. THAT WASN'T MONEY --

5 Q WHAT ABOUT HIS EXPENSES IN SAN FRANCISCO? WAS
6 THAT A FLAT-OUT PAYMENT?

7 A NO.

8 Q BUT NO RECORDATION FOR MR. MULL THAT IT WAS A
9 LOAN, NOT IN JANUARY, NOT IN FEBRUARY, NOT IN MARCH, NOT IN
10 APRIL, NOT UNTIL YOU HAD A MEETING IN SEPTEMBER; ISN'T THAT
11 RIGHT?

12 A THE RECORDATION THAT WE FELT WE HAD WAS THE
13 WRITTEN OFFER THAT HE HAD MADE TO US TO REPAY THE MONEY WHEN
14 HIS HOUSE SOLD.

15 Q ON THE LETTER OF FEBRUARY 22ND, LETTER THAT IS
16 RIGHT IN FRONT OF YOU, DOES IT NOT SAY THAT, "THE PROJECT
17 WILL TAKE FOUR YEARS AND IT WILL REQUIRE IN EXCESS OF
18 \$30,000 IF I HAVE THE MONEY ONCE I SELL MY HOUSE"?

19 A YES, IT DOES SAY THAT. AND THAT IS WHY IN OUR
20 MEMO BACK TO HIM WE TOLD HIM THAT WE WERE ONLY MAKING THIS
21 ARRANGEMENT DURING THE DURATION OF THE TIME THAT IT TOOK TO
22 DO THE MONTESSORI BUILDINGS AND ANY OTHER PROJECTS WE HAD IN
23 THE IMMEDIATE FUTURE. THAT IS WHY WE RESPONDED AS WE DID.

24 Q DO YOU RECALL MR. MULL SAYING TO YOU, "I AM 57
25 YEARS OLD AND THIS IS EVERYTHING I'VE GOT IN THE WORLD. IF
26 WE CAN'T MAKE AN ARRANGEMENT, AT 57 YEARS OF AGE, WHAT AM I
27 GOING TO DO WITH THE REST OF MY LIFE?"

28 DO YOU REMEMBER THAT IN HIS LETTER, MR.

1 SHEARER?

2 A YES, I DO. AND THAT IS WHY WE TOLD HIM THAT
3 BEYOND THAT PERIOD OF TIME, HE WOULD HAVE TO BE PREPARED TO
4 SUPPORT HIMSELF FINANCIALLY EITHER AROUND CAMELOT OR IN THE
5 SAN FRANCISCO AREA. BECAUSE WE WANTED IT VERY CLEAR TO HIM
6 THAT HE WOULD HAVE TO -- IF HE CHOSE TO VOLUNTEER HIS TIME,
7 HE WOULD HAVE TO BE PREPARED FOR THAT EVENTUALITY.

8 Q LET ME READ ONE SENTENCE BECAUSE WE HAVE
9 ALREADY READ THE ENTIRE LETTER, MR. KLEIN. (READING.)

10 "THE \$700 PER MONTH SALARY PLUS
11 LIVING EXPENSES LIVING ON OR OFF CAMPUS MUST
12 BE AGREED UPON BY YOU BEFORE THE FOREGOING
13 OFFER CAN BE A COMMITMENT."

14 DID YOU EVER COMMIT YOURSELF TO PAYING HIM THE
15 \$700 A MONTH PLUS HIS EXPENSES ON OR OFF CAMPUS BEFORE HE
16 COULD MAKE A COMMITMENT TO YOU?

17 A THAT IS JUST THE POINT. THIS WAS HIS PROPOSAL.
18 AND WHAT WE RESPONDED BACK TO HIM WAS THAT WE WOULD NOT MAKE
19 THAT COMMITMENT, THAT WE WOULD ONLY COMMIT TO DOING THIS FOR
20 THE PERIOD OF TIME THAT HE WAS WORKING ON THE MONTESSORI
21 PROJECT AND ANY OTHER PROJECTS WE HAD IN THE IMMEDIATE
22 FUTURE. AND THAT BEYOND THAT PERIOD OF TIME, HE WOULD HAVE
23 TO BE PREPARED TO SUPPORT HIMSELF FINANCIALLY EITHER AROUND
24 CAMELOT OR IN THE SAN FRANCISCO AREA.

25 WE WANTED HIM TO HAVE -- TO GO INTO THAT
26 UNDERSTANDING WITH A FULL AWARENESS. HE HAD ONLY BEEN DOWN
27 THERE FOR A MONTH AND A HALF OR TWO MONTHS BY THAT POINT IN
28 TIME AND WE WANTED TO HAVE IT VERY CLEAR TO HIM.

1 Q AND THAT IS WHY YOU WAITED UNTIL SEPTEMBER TO
2 HAVE HIM SIGN THE NOTE?

3 A NO. WE NEVER DREAMED THAT IT WOULD GO ON UNTIL
4 SEPTEMBER. WE THOUGHT THAT HIS HOUSE WOULD SELL AND THE
5 WHOLE THING WOULD BE OVER IN A MONTH OR TWO. AND INSTEAD --

6 Q AND THEN -- EXCUSE ME. I AM SORRY.

7 A INSTEAD, THIS -- THE CHECKS KEPT GOING OUT
8 EVERY MONTH AND THE AMOUNT OF MONEY GOT FAR GREATER THAN
9 ANYONE HAD DREAMED THAT IT WOULD.

10 AND SO WHEN THOSE AMOUNTS GOT SO LARGE, WE
11 SAID, YOU KNOW, "IF WE ARE GOING TO CONTINUE DOING THIS,"
12 WHICH WE DID DO, WE DID CONTINUE FOR A PERIOD OF TIME, WE
13 SAID, "WE HAVE TO DOCUMENT THIS."

14 Q NOW YOU HAVE GOT ME CONFUSED NOW. THERE WAS
15 SOMEWHERE ALONG THE WAY THAT YOU TOLD ME THAT THE
16 ARCHITECTURAL FIRM THAT THE CHURCH HIRED DID A LAYOUT AND
17 CHARGED YOU \$50,000, AND YOU WANTED TO SAVE MONEY SO YOU GOT
18 AHOLD OF MR. MULL; IS THAT RIGHT?

19 A THAT'S RIGHT.

20 Q FOR THE CENTER PAGE IN HERE, WHICH IS THE
21 LAYOUT, THAT WAS \$50,000, RIGHT?

22 A THE MASTER PLAN?

23 Q YEAH, THE MASTER PLAN. THIS IS A MASTER PLAN,
24 RIGHT?

25 A THAT IS A DRAWING OF THE MASTER PLAN.

26 Q AND FOR 17 MONTHS OF WORK, MR. MULL WAS GOING
27 TO BE REQUIRED TO SELL HIS HOUSE AND SUPPORT HIMSELF AND
28 WORK FULL-TIME FOR YOU; IS THAT RIGHT?

1 A OUR UNDERSTANDING WAS THAT GREGORY WANTED TO
2 VOLUNTEER AS A STAFF MEMBER THE WAY OTHER PEOPLE WERE DOING
3 ON THE CAMPUS.

4 Q THAT WAS YOUR UNDERSTANDING?

5 A YES.

6 Q BUT IN HIS LETTER OF FEBRUARY THE 22ND, HE
7 SAID, "I CAN'T DO THIS UNLESS YOU MAKE A COMMITMENT TO ME."

8 A THAT IS WHY WE CLARIFIED THE SITUATION WITH
9 HIM. AND HE WROTE BACK AND SAID, "THANK YOU FOR YOUR LOAN
10 SUPPORT. I ACCEPT YOUR DECISION PER YOUR MEMO."

11 Q YOU STOPPED PAYING HIM IN OCTOBER OF 1979; IS
12 THAT CORRECT?

13 A WE STOPPED LOANING HIM MONEY IN OCTOBER OF
14 1979.

15 Q A PORTION OF THAT WAS PAYMENT, WASN'T IT? YOU
16 SAID YOU PAID HIM STRAIGHT OUT FOR HIS TRAVELS?

17 A WELL, AFTER OCTOBER WE CONTINUED TO GIVE HIM
18 ROOM AND BOARD.

19 Q AND YOU CONTINUED TO UTILIZE HIS ARCHITECTURAL
20 SERVICES FOR ABOUT 20 HOURS OR MORE PER WEEK, DID YOU NOT?

21 A YES. BUT YOUR QUESTION WAS WE STOPPED PAYMENT
22 TO HIM AND WE DIDN'T. WE ONLY STOPPED THE LOANS IN OCTOBER.

23 Q KIND OF LIKE A GAME IN SEMANTICS?

24 A WELL, I AM ANSWERING YOUR QUESTION.

25 Q YOU STOPPED PAYING HIS EXPENSES IN OCTOBER.
26 THAT IS THE LAST TIME YOU TURNED OVER ANY MONEY TO MR. MULL,
27 WAS IT NOT?

28 A AS I RECALL.

1 Q YOU HAD A MEETING WITH HIM IN MAY OF 1980?

2 A YES.

3 Q WHO AUTHORIZED THE MEETING?

4 A (NO AUDIBLE RESPONSE.)

5 Q ELIZABETH, THE MASTERS, YOURSELF, WHO?

6 A I THINK WE ALL JUST AGREED IT WOULD BE A GOOD
7 IDEA TO GET TOGETHER AND DISCUSS IT.

8 Q ELIZABETH WAS OUT OF THE COUNTRY AT THAT TIME,
9 WAS SHE NOT?

10 A I WILL BE HONEST WITH YOU, SHE WAS OUT OF THE
11 COUNTRY ON TWO TRIPS. AND THE EXACT DATES THAT SHE WAS OUT
12 AND THE SEQUENCE OF GREGORY'S LETTERS AT THAT PERIOD OF TIME
13 ARE NOT FRESH IN MY MEMORY.

14 THE ONLY THING I DO RECALL IS OBVIOUSLY BY THE
15 TIME OF THE MEETING, SHE HAD RETURNED AND WE MADE
16 ARRANGEMENTS FOR THE MEETING ONLY WHEN WE KNEW THAT SHE
17 WOULD BE AVAILABLE.

18 Q IT IS NOT CLEAR IN YOUR MIND?

19 A WHEN SHE WAS OUT OF THE COUNTRY? NO.

20 Q LET ME TAKE A GUESS. I AM GOING TO GUESS THAT
21 YOU HAVE DISCUSSED THIS MATTER WITH YOUR ATTORNEY?

22 A THE -- NOT THE PERIODS OF TIME WHEN SHE WAS OUT
23 OF THE COUNTRY.

24 Q YOU DIDN'T DISCUSS ABOUT 19 -- IN MAY OF 1980
25 WHEN MR. MULL WAS ASKED TO LEAVE THE CHURCH?

26 MR. KLEIN: I AM GOING TO OBJECT IF HE IS ASKING IF
27 HE DISCUSSED IT WITH HIS ATTORNEY.

28 THE COURT: HE CAN ANSWER WHETHER THERE WAS A

1 DISCUSSION.

2 MR. KLEIN: ABOUT A PARTICULAR SUBJECT WITH HIS
3 ATTORNEY, I WOULD OBJECT. THAT IS A LAWYER/CLIENT PRIVILEGE
4 WHAT HE DISCUSSES WITH ME, YOUR HONOR.

5 THE WITNESS: I AM SORRY, WHAT IS THE QUESTION ONE
6 MORE TIME?

7 Q BY MR. LEVY: WE ARE TALKING ABOUT WHAT YOU
8 MIGHT HAVE DISCUSSED WITH YOUR ATTORNEY WITH REGARD TO WHEN
9 MR. MULL WAS ASKED TO LEAVE THE CHURCH IN 1980. DID YOU
10 TALK GENERALLY ABOUT THAT AREA WITH MR. KLEIN?

11 A IN GENERAL, BUT NOT ABOUT THE TIME OF THOSE --
12 OF WHEN SHE WAS OUT OF THE COUNTRY, NO. WE DID NOT TALK
13 ABOUT WHEN SHE WAS OUT OF THE COUNTRY.

14 Q OKAY. NOW ELIZABETH WAS OUT OF THE COUNTRY
15 THEN.

16 WHO GAVE YOU THE AUTHORITY TO KICK GREGORY MULL
17 OUT OF THE CHURCH? TELL HIM TO GET OUT OF CAMELOT? WAS
18 THAT YOUR UNILATERAL DECISION?

19 MR. KLEIN: I AM GOING TO OBJECT. THAT IS A COMPOUND
20 QUESTION. THERE IS AT LEAST THREE THERE.

21 THE COURT: YOU HAVE ASKED SEVERAL QUESTIONS. LET'S
22 GO ONE AT A TIME.

23 Q BY MR. LEVY: LET ME DO IT ONE AT A TIME FOR
24 YOU. DID YOU HAVE UNILATERAL AUTHORITY TO ASK MR. MULL TO
25 LEAVE THE CHURCH IN 1980?

26 A NO. AND I DIDN'T ASK HIM TO LEAVE THE CHURCH.

27 Q WOULD YOU TELL ME WHAT IT WAS THAT YOU SAID TO
28 MR. MULL THAT CAUSED HIM TO HAVE TO EXIT THE PREMISES OF

1 CAMELOT IN MAY OF 1980?

2 A I SUGGESTED TO HIM THAT SINCE HIS SERVICES WERE
3 NOT BEING UTILIZED AT THAT POINT, THAT IT WOULD BE BETTER
4 FOR HIM TO LIVE IN THE CONDOMINIUM THAT HE HAD AND TO MOVE
5 OFF CAMPUS. BUT THERE WAS NOTHING ABOUT LEAVING THE CHURCH,
6 JUST MOVE OFF CAMPUS.

7 Q HE SOLD HIS HOME, HE GAVE UP HIS BUSINESS, HE
8 WAS WORKING FOR YOU FROM OCTOBER OF 1979 TO MAY OF 1980, AND
9 ONE DAY YOU SAID, "I THINK IT WOULD BE NICE IF YOU MOVED
10 OVER TO YOUR CONDOMINIUM."

11 IS THAT ABOUT HOW THAT CONVERSATION WENT DOWN?

12 A NO, THAT IS NOT ABOUT HOW IT WENT DOWN.

13 Q ISN'T IT A FACT, MR. SHEARER, THAT WHEN YOU
14 COULDN'T GET HIS CONDO AND YOU COULDN'T GET HIS MONEY AND
15 YOU COULDN'T GET ANYTHING ELSE OF VALUE FROM HIM, YOU KICKED
16 HIM OUT OF THE CHURCH, DIDN'T YOU?

17 A NO. ABSOLUTELY NOT.

18 Q AND YOU JUST ASKED HIM TO GO AWAY BECAUSE HE
19 DISAGREED WITH YOU?

20 A THE PURPOSE OF HIM LIVING ON CAMPUS WAS BECAUSE
21 HE WAS GOING TO BE WORKING ON THE PROJECTS. AND AT THAT
22 POINT IN TIME, HE WAS NO LONGER WORKING ON PROJECTS FOR US.
23 WE HAVE STAFF MEMBERS WHO NEED THOSE FACILITIES.

24 Q THOSE HUGE FACILITIES WHERE HE HAD HIS OFFICE
25 AND WHERE HE SLEPT IN THAT TEN-SIX BY ELEVEN FOOT ROOM, YOU
26 NEEDED THAT?

27 A YES.

28 Q AND THAT IS THE REASON YOU ASKED HIM TO LEAVE

1 THE CHURCH, TO LEAVE CAMELOT?

2 A TO MOVE OFF CAMPUS. HE WAS STILL FREE TO COME
3 ON FOR MEETINGS AND SO FORTH.

4 Q WHOSE IDEA WAS IT TO SUMMON HIM BACK TO THAT
5 LAST TWO AND A HALF HOUR MEETING, MR. SHEARER? WAS IT YOURS
6 OR WAS IT ELIZABETH'S?

7 A I THINK WE ALL DECIDED IT WOULD BE A GOOD IDEA
8 TO MEET WITH HIM.

9 Q YOU ALL DECIDED?

10 A YES.

11 Q WAS ANYTHING HAPPENED IN THAT CHURCH BECAUSE
12 SOLELY YOU DECIDED AND IT WAS NOT A DIRECTIVE OF ELIZABETH
13 CLARE PROPHET'S?

14 A I AM SURE SOME THINGS.

15 Q IN 14 YEARS I AM SURE THERE WOULD BE SOME
16 THINGS, BUT WOULD IT BE A FAIR STATEMENT TO SAY THAT
17 ELIZABETH CLARE PROPHET RAN THE SHOW?

18 MR. KLEIN: I AM GOING TO OBJECT AS VAGUE AND
19 AMBIGUOUS AS TO RUNNING THE SHOW.

20 THE COURT: SUSTAINED.

21 MR. LEVY: THAT IS ONE I CAN FIND IN THE DEPOSITION
22 EASILY. I THINK THOSE WERE YOUR EXACT WORDS.

23 MR. KLEIN: WHATEVER IT IS, IT IS STILL VAGUE AND
24 AMBIGUOUS.

25 THE COURT: GENTLEMEN, I DON'T WANT A COLLOQUY. I
26 HAVE TOLD YOU THAT BEFORE.

27 MR. KLEIN: YES, YOUR HONOR.

28 MR. LEVY: I AM READING FROM THE SECOND VOLUME OF THE

1 DEPOSITION OF ELIZABETH CLARE FRANCIS. I AM READING FROM
2 PAGE 211, LINE 14, TO PAGE 212, LINE 3. (READING.)

3 "Q MRS. FRANCIS, DO YOU HAVE
4 THE UNILATERAL AUTHORITY AS THE HEAD OF YOUR
5 ORGANIZATION TO RESOLVE DISPUTES BETWEEN THE
6 BOARD AND THE MEMBERS?

7 "A I HAVE THE RESPONSIBILITY
8 TO RESOLVE DISPUTES.

9 "Q DO YOU HAVE THE
10 UNILATERAL AUTHORITY TO RESOLVE DISPUTES?
11 CAN YOU MAKE A DECISION HOW SOMETHING SHOULD
12 BE RESOLVED?

13 "A YES.

14 "Q BETWEEN CHURCH UNIVERSAL
15 AND SAY ANY OF ITS COMMUNICANTS?

16 "A IT'S HARD TO KNOW WHAT
17 I'M ANSWERING TO WHEN I ANSWER YOUR
18 QUESTION, BUT I ADJUDICATE DISPUTES BETWEEN
19 MEMBERS, BETWEEN THE CHURCH AND MEMBERS, AND
20 OFFER WHAT I BELIEVE IS THE CORRECT
21 SOLUTION. SOMETIMES IT'S UP TO THE FREE
22 WILL OF THE PEOPLE TO ACCEPT IT. IN THE
23 CASE OF EMPLOYEES, IN THE MATTER OF CHURCH
24 POLICY OR WHAT IS GOING TO BE THE DECISION
25 SO WE CAN GET ON WITH THE SHOW, SOMEBODY HAS
26 TO HAVE THE LAST WORD. I HAVE THE LAST
27 WORD."

28 Q WAS IT ELIZABETH CLARE PROPHET WHO RAN THE

1 SHOW?

2 MR. KLEIN: YOUR HONOR, I WOULD JUST ASK FOR A MOMENT
3 IF I CAN SEE THE REST OF THAT PAGE.

4 MR. LEVY: WHY DON'T YOU DO IT -- EXCUSE ME, YOUR
5 HONOR.

6 MR. KLEIN: IF WE ARE READING, I WOULD JUST ASK TO BE
7 ALLOWED TO LOOK AT THE REST OF THAT PAGE IF YOUR HONOR WOULD
8 PERMIT FOR A MOMENT.

9 THE COURT: DON'T YOU HAVE YOUR OWN COPY?

10 MR. KLEIN: I DO NOT HAVE MY OWN COPY WITH ME, YOUR
11 HONOR, AT THIS MOMENT.

12 THE COURT: ALL RIGHT. WHY DON'T YOU LOOK AT IT.

13 PROCEED, MR. LEVY.

14 MR. LEVY: THANK YOU, YOUR HONOR.

15 Q DID YOU HAVE A TWO AND A HALF HOUR MEETING WITH
16 GREGORY MULL?

17 A YES.

18 Q HOW MANY PEOPLE WERE AT THE MEETING?

19 A FOUR.

20 Q WHO WERE THE FOUR?

21 A GREGORY MULL, EDWARD FRANCIS, ELIZABETH PROPHET
22 AND MYSELF.

23 Q CAN YOU DESCRIBE FOR ME THE LAYOUT OF THE ROOM
24 WHEN YOU HAD THAT TWO AND A HALF HOUR MEETING WITH REGARD TO
25 THE POSITION OF THE PEOPLE?

26 LET ME HELP YOU. LET ME START BY PUTTING A
27 DESK IN (MARKING). THAT IS A DESK.

28 WHERE WAS ELIZABETH CLARE PROPHET?

1 A SEATED AT THE DESK.

2 Q WHERE AT THE DESK?

3 A SEATED BEHIND THE DESK.

4 Q SO WE WILL PUT ELIZABETH CLARE PROPHET BEHIND

5 THE DESK (MARKING).

6 WHERE WAS GREGORY MULL?

7 A OPPOSITE HER.

8 Q WHERE WERE YOU, SIR?

9 A I WAS TO GREGORY'S RIGHT.

10 Q GREGORY IS FACING HER, YOU WOULD BE HERE

11 (POINTING)?

12 A YES.

13 Q WHERE WAS ED FRANCIS?

14 A TO HER LEFT.

15 Q TO HER LEFT?

16 A TO HIS LEFT, EXCUSE ME. TO GREGORY'S LEFT.

17 Q IS THAT AN ACCURATE DESCRIPTION OF ABOUT HOW

18 EVERYONE WAS PLACED DURING THAT TWO AND A HALF HOUR MEETING?

19 A YES.

20 Q DID YOU KIND OF HAVE HIM BOXED IN, MR. SHEARER?

21 A WELL, BY BOXED IN, ARE YOU REFERRING TO HOW

22 TIGHTLY COMPRESSED YOU HAVE GOT EVERYTHING?

23 Q NO. I MEAN YOU WERE ON ONE SIDE, AND EDWARD

24 WAS ON THE OTHER SIDE AND ELIZABETH WAS RIGHT IN FRONT OF

25 HIM?

26 A THAT'S RIGHT. THE KIND OF A DESK IT WAS, IT

27 WASN'T THE KIND OF DESK WHERE YOU WOULD HAVE PEOPLE SITTING

28 OFF TO THE SIDE. THERE WEREN'T ANY OVERLEAFS OR ANYTHING.

1 SO THAT WAS THE -- THAT WAS MY OFFICE AND THAT
2 IS HOW THE CHAIRS WERE SET UP IN THAT OFFICE. SO WHENEVER
3 PEOPLE CAME IN, THAT IS WHERE THEY SAT.

4 Q HAVE YOU HAD OCCASION TO READ A TRANSCRIPT OF
5 THE TWO AND A HALF HOUR CONFERENCE?

6 A YES.

7 Q DID YOU FIND IT UNUSUAL THAT 99 PERCENT OF THE
8 CONVERSATION CAME FROM YOU, FROM ELIZABETH AND FROM EDWARD
9 AND THE MINIMAL BALANCE CAME FROM MR. MULL?

10 A I DON'T KNOW WHAT PERCENTAGE IT WAS. BUT I
11 DIDN'T FIND THE CONVERSATIONS UNUSUAL, NO, IN GENERAL.

12 Q DID YOU FIND IT SOMEWHAT UNUSUAL THAT EVERY
13 TIME MR. MULL STARTED TO MAKE A STATEMENT, EITHER YOU OR
14 EDWARD OR ELIZABETH CUT HIM OFF?

15 A NO. TO THE CONTRARY. I RECALL THAT ESPECIALLY
16 NEAR THE END OF THE CONVERSATION, ELIZABETH ASKED HIM TO
17 STATE WHATEVER HE WANTED TO STATE, ANYTHING HE WANTED TO
18 SAY. AND HE KEPT SAYING, "I WANT YOU TO LISTEN TO MY TAPE.
19 THAT IS WHAT I WANT YOU TO DO, TO LISTEN TO MY TAPE."

20 Q AND THAT WAS TOWARD THE VERY END OF THE TWO AND
21 A HALF HOURS?

22 A IN THE LATTER PART OF IT, YES.

23 Q WOULD IT BE FAIR STATEMENT TO SAY YOU HAD HIM
24 WORN DOWN BY THEN?

25 A NO.

26 Q DID YOU ALREADY HAVE HIS \$5,500 BY THEN?

27 A NO.

28 Q WASN'T IT TOWARD THE END OF THE TWO AND A HALF

1 HOURS THAT YOU, AS AN EMISSARY OF THE CHURCH, AND ELIZABETH
2 AND ED FRANCIS OBTAINED FROM MR. MULL WHAT HE TOLD YOU AT
3 THAT TIME WAS HIS LAST \$5,500 THAT HE HAD IN THE BANK?

4 A HE CHOSE TO MAKE A CONTRIBUTION ON THAT
5 OCCASION.

6 Q I SEE. HE DOESN'T HAVE THE HOME IN SAN
7 FRANCISCO ANYMORE, HE DOESN'T HAVE A BUSINESS, HE HAS
8 BORROWED MONEY TO GET A CONDOMINIUM FOR HIS DAUGHTER AND HE
9 CHOSE AT THAT TIME TO GIVE YOU HIS LAST PENNY?

10 A I DIDN'T SAY THAT.

11 Q WELL, YOU HAVE GOT ME CONFUSED NOW.

12 A I SAID HE CHOSE TO MAKE A CONTRIBUTION OF
13 \$5,000.

14 Q OH. DID YOU HEAR ELIZABETH CLARE PROPHET TELL
15 GREGORY ABOUT THE STORY OF ANANIAS AND SAPPHIRA?

16 A YES.

17 Q IS THAT THE STORY WHERE THE PROPHET SAYS IF YOU
18 HOLD BACK ANYTHING, YOU ARE GOING TO DIE?

19 A NO.

20 Q BUT IN THAT PARABLE, IS THAT WHERE ANANIAS AND
21 SAPPHIRA BOTH DIE WHEN THEY HOLD BACK SOMETHING FROM THE
22 PROPHET?

23 A NO, THEY DO NOT DIE FOR THAT REASON. THEY DIED
24 BECAUSE THEY LIED.

25 Q AHH. WHAT ABOUT YOU, MR. SHEARER? IF YOUR
26 TESTIMONY HAS BEEN A LIE HERE TODAY, ARE YOU GOING TO DIE,
27 TOO?

28 A I GUESS SO, YES. THAT IS WHAT THE SCRIPTURE

1 SAYS.

2 Q WHAT WAS THE PURPOSE, IF YOU KNOW, OF
3 CONFRONTING GREGORY MULL DURING THAT LAST TWO AND A HALF
4 HOURS WITH THE STORY OF ANANIAS AND SAPPHIRA OTHER THAN TO
5 ADD MORE PRESSURE TO A MAN WHO HAD ALREADY BEEN PRESSURED
6 FOR MONTHS BY YOU PEOPLE?

7 A THAT WAS NOT THE PURPOSE AT ALL.

8 Q IT WAS JUST TO EDUCATE HIM ABOUT THE BIBLE AT
9 THAT PARTICULAR TIME?

10 A NOT IN GENERAL ABOUT THE BIBLE. ABOUT CERTAIN
11 TEACHINGS, ABOUT MAKING REPRESENTATIONS, OF MAKING FALSE
12 REPRESENTATIONS.

13 Q DID GREGORY MULL TELL YOU DURING THE LAST TWO
14 AND A HALF HOUR CONFERENCE THAT HE HAD COME TO THE CHURCH
15 WITH PARTICULAR UNDERSTANDING THAT HE HAD RECEIVED FROM YOU;
16 AND THAT HIS CONCERN WAS THAT NOT ELIZABETH, BUT YOU AND ED
17 FRANCIS HAD CHANGED THINGS ON HIM?

18 A YES, HE SAID THAT.

19 Q AS A MATTER OF FACT, HE WAS ALWAYS VERY
20 RESPECTFUL TO ELIZABETH, HE WOULD NEVER DO OR SAY ANYTHING
21 IN ANY WAY, SHAPE OR FORM THAT WAS CONTRARY TO WHAT SHE
22 WANTED, WOULD HE?

23 A HE HAD ALREADY DONE THINGS THAT HE KNEW WERE
24 CONTRARY SUCH AS DECREERING AGAINST HER OR DOING REVERSE OF
25 TIDES AGAINST HER AT THE TIME. SO HE WAS DOING THINGS THAT
26 HE KNEW WERE NOT THINGS THAT SHE WOULD AGREE WITH.

27 Q WELL, THERE WAS A DISCUSSION ABOUT DOING
28 DECREES ABOUT REVERSING THE TIDES. WHAT ARE DECREES?

1 A I THINK, AS I AM SURE YOU READ YESTERDAY, THEY
2 ARE DEMANDS THAT ARE MADE UPON GOD AND DEMANDS THAT GOD
3 MAKES THROUGH YOU.

4 Q THEY ARE NOT PRAYERS THEN?

5 A PRAYERS ARE ANOTHER WAY OF SPEAKING TO GOD.

6 Q BUT A DECREE IS NOT A PRAYER THEN IF YOU ARE
7 MAKING DEMANDS, IS IT?

8 A I -- MY PERSONAL OPINION IS THAT ALL DECREES
9 ARE PRAYERS, BUT YOU WOULDN'T NECESSARILY SAY THAT ALL
10 PRAYERS WERE ALSO DECREES.

11 Q WAS THERE A CONVERSATION BETWEEN GREGORY AND
12 ELIZABETH WITH REGARD TO HIS REVERSING THE TIDES DURING THAT
13 TWO AND A HALF HOUR MEETING?

14 A YES, THAT CAME UP.

15 Q DID MR. MULL NOT TELL ELIZABETH THAT HE WAS
16 REVERSING THE TIDES IN CASE THERE WAS ANY NEGATIVITY COMING
17 FROM ELIZABETH OR THE CHURCH?

18 A YES, HE DID SAY THAT.

19 Q AND DID NOT ELIZABETH SAY, "NOTHING NEGATIVE
20 COULD EVER COME FROM ME"?

21 A I DON'T REMEMBER HER EXACT WORDS, BUT I THINK
22 THAT SHE WAS CHAGRINED THAT HE WOULD THINK THAT SHE WAS
23 SENDING HIM DESTRUCTIVE ENERGY.

24 Q ARE YOU SAYING THAT YOU CAN PRAY FOR
25 DESTRUCTIVE ENERGY?

26 A THAT IS JUST THE POINT. YOU CAN'T. I MEAN,
27 WELL, THAT IS NOT THE PURPOSE OF OUR DECREES AND THEY DON'T
28 WORK THAT WAY.

1 Q WHEN YOU DECREE AGAINST COMMUNISM, ARE YOU
2 DECREEING IN FAVOR OF IT?

3 A NO.

4 Q WELL, NOW YOU ARE BEGINNING TO GET ME TOTALLY
5 AND COMPLETELY CONFUSED. YOU EITHER DO PRAY OR YOU DON'T
6 PRAY, YOU EITHER DECREE OR YOU DON'T DECREE, IT CAN EITHER
7 BE THIS OR THAT.

8 IS IT A MATTER OF WHATEVER YOU WANT IT TO BE
9 WHENEVER YOU ARE TESTIFYING ABOUT IT, OR IS IT THE SAME
10 THING EACH AND EVERY DAY, AND IS THE RULE THE SAME AS
11 EVERYONE, OR DO YOU AS THE ARCHBISHOP HAVE DIFFERENT RULES?

12 A THERE IS ONE PRINCIPLE OF THE LAW AND IT IS
13 APPLIED UNIVERSALLY. NO ONE BECAUSE OF THEIR PERSONALITY OR
14 WHO THEY ARE IS EVER EXEMPT FROM THE LAW.

15 DESTRUCTIVITY, THE WAY IT WAS USED IS TALKING
16 ABOUT INHARMONY. AND SHE WAS CHAGRINED TO THINK THAT HE
17 WOULD BELIEVE THAT SHE WAS INHARMONIOUS WHERE HE WAS
18 CONCERNED.

19 Q HOW COULD HE POSSIBLY BE INHARMONIOUS? HE HAS
20 GIVEN UP --

21 A I DIDN'T SAY HE WAS. I SAID HE THOUGHT SHE
22 WAS.

23 Q SHE'S BEEN INSTRUMENTAL IN GETTING HIM TO GIVE
24 UP HIS HOME, TO SELL IT, TO GIVE UP HIS BUSINESS, TO MOVE
25 FROM SAN FRANCISCO TO COME TO CAMELOT TO WORK FOR NINE
26 MONTHS WHEN HE WAS RECEIVING COMPENSATION TO WORK FOR SEVEN
27 MORE FOR NOTHING, AND THEN GETTING KICKED OUT OF THE CHURCH
28 AND THEN BEING SUMMONED BACK WHERE HE GAVE UP HIS LAST

1 \$5,500, HOW COULD HE POSSIBLY THINK THAT ANYTHING THAT SHE
2 WAS INVOLVED IN WOULD BE DISHARMONIOUS?

3 YOUR HONOR, IT IS TWELVE O'CLOCK. I WONDER IF
4 IT MIGHT BE CONVENIENT FOR THE COURT TO TAKE ITS BREAK AT
5 THIS TIME.

6 THE COURT: WE WILL RESUME AT 1:30. I WANT TO SEE
7 COUNSEL FOR A MOMENT.

8 (A CONFERENCE WAS HELD AT THE BENCH
9 WHICH WAS NOT REPORTED.)

10 (AT 12:00 P.M., A RECESS WAS TAKEN UNTIL
11 1:30 P.M. OF THE SAME DAY.)
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1 LOS ANGELES, CALIFORNIA; TUESDAY, MARCH 11, 1986 *

2 1:45 P.M.

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

5
6 MONROE JULIUS SHEARER, III, +

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

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

12 THE WITNESS: MONROE SHEARER.

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 MR. SHEARER, BEFORE WE WENT TO LUNCH, WE WERE
20 TALKING ABOUT THAT TWO AND A HALF HOUR MEETING THAT YOU HAD
21 ALONG WITH ELIZABETH CLARE PROPHET AND EDWARD FRANCIS AND
22 GREGORY MULL.

23 IN YOUR OPINION, WAS THAT MEETING A FRIENDLY
24 OPEN EXCHANGE OF EACH OTHER'S VIEWS?

25 A YES.

26 Q WAS THAT AN ARRANGEMENT WHEREBY THE FOUR OF YOU
27 DISCUSSED OPENLY WHAT YOUR PERSONAL ATTITUDE AND THE -- WHAT
28 THE CHURCH'S ATTITUDE WAS WITH REGARD TO MR. MULL?

1 A NOT REALLY.

2 Q WOULD YOU EXPLAIN WHAT IT WAS THEN?

3 A IT WAS A DISCUSSION ABOUT THE FACT THAT HE HAD
4 LOANED THIS MONEY -- BORROWED THIS MONEY FROM THE CHURCH AND
5 WHAT WERE WE GOING TO DO ABOUT IT.

6 Q AT THAT MEETING, DID YOU COME TO ANY CONCLUSION
7 AS TO WHAT WAS GOING TO BE DONE ABOUT IT?

8 A I DON'T THINK THERE WERE ANY HARD AND FAST
9 CONCLUSIONS DRAWN.

10 Q DO YOU RECALL DURING THAT CONVERSATION
11 ELIZABETH CLARE PROPHET TELLING MR. MULL THAT, "I AM NOT
12 GOING TO SUE YOU"?

13 A I RECALL HER SAYING THAT EARLY ON OR MIDWAY
14 THROUGH, YES.

15 Q DO YOU RECALL HER SAYING IT NOT ONCE, NOT
16 TWICE, NOT THREE TIMES, NOT EVEN FIVE TIMES, BUT AT LEAST A
17 HALF A DOZEN TIMES DURING THE TWO AND A HALF HOUR MEETING,
18 SHE PROMISED GREGORY MULL SHE WOULD NOT SUE HIM?

19 A I DON'T RECALL THE EXACT NUMBER, BUT SHE DID
20 SAY IT SEVERAL TIMES, YES.

21 Q WHY DID THE CHURCH SUE HIM IF HE WAS --
22 THE COURT: KEEP YOUR VOICE UP.

23 Q BY MR. LEVY: -- IF HE WAS PROMISED HE WAS NOT
24 GOING TO BE SUED?

25 I WILL SPEAK LOUDER, YOUR HONOR.

26 A BECAUSE HE DID NOT SETTLE WITH THE CHURCH AND
27 HE CONTINUED TO ATTACK THE CHURCH.

28 Q YOU SUED HIM BECAUSE HE ATTACKED THE CHURCH?

1 A YES.

2 Q AND BECAUSE HE DID NOT SETTLE WITH THE CHURCH;
3 IS THAT CORRECT?

4 A YES.

5 Q IS THAT WHAT YOU SAID?

6 A YES.

7 Q USUALLY WHEN ELIZABETH CLARE PROPHET TELLS
8 SOMEONE WHAT SHE IS GOING TO DO OR WHAT SHE IS NOT GOING TO
9 DO, ISN'T IT SO THAT THAT INDIVIDUAL HAS A REASONABLE RIGHT
10 TO RELY UPON WHAT IT IS SHE TELLS HIM?

11 A YES, SHE WOULD HAVE.

12 Q NOW, IN THAT EVENT, ELIZABETH CLARE PROPHET
13 TOLD GREGORY MULL AT LEAST SIX TIMES SHE WAS NOT GOING TO
14 SUE HIM.

15 IN YOUR OPINION, DID MR. MULL HAVE A REASONABLE
16 EXPECTATION THAT SHE WAS NOT GOING TO SUE HIM?

17 A NO. BECAUSE SHE -- BECAUSE SHE MADE IT CLEAR
18 THAT THE REASON SHE SAID THAT IS BECAUSE SHE HAD THE
19 UNDERSTANDING THAT HE WAS GOING TO SETTLE FOR \$10,000 AS HE
20 HAD SAID IN HIS LETTER. AND HE DID NOT SETTLE FOR \$10,000.

21 Q SO THEN YOU SUED FOR \$37,000 INSTEAD OF THE
22 \$10,000 THAT MR. MULL AT ONE TIME HAD OFFERED?

23 A THIRTY-TWO THOUSAND I BELIEVE.

24 Q THREE TIMES THE FIGURE THAT YOU ARE TALKING
25 ABOUT?

26 A YES.

27 Q DOES IT SEEM TO YOU THAT THERE MIGHT BE A
28 LITTLE BIT OF INCONSISTENCY THERE? THE SPIRITUAL LEADER OF

1 THE CHURCH, WHO SAYS SHE HAS THE ULTIMATE AUTHORITY, TELLS
2 THE MAN SHE IS NOT GOING TO SUE HIM; AND THEN SHE SUES HIM
3 NOT FOR WHAT HE OFFERED TO DONATE TO THE CHURCH, BUT FOR IN
4 EXCESS OF THREE TIMES THAT AMOUNT AFTER SHE'S GIVEN HER WORD
5 SIX TIMES SHE IS NOT GOING TO DO IT?

6 NOW, THERE WAS ANOTHER REASON YOU SAID THAT SHE
7 SUED HIM. AND THAT WAS BECAUSE HE HAD ATTACKED THE CHURCH?

8 A CONTINUED TO ATTACK THE CHURCH.

9 Q AND IN WHAT MANNER DID HE ATTACK THE CHURCH?

10 A HE MADE FALSE ALLEGATIONS TO THE BUILDING
11 DEPARTMENT ABOUT THE LACK OF SAFETY ON OUR PREMISES. HE
12 WROTE LETTERS TO VARIOUS NEWSPAPERS CRITICAL OF THE CHURCH.
13 THAT IS AN ATTACK ON THE CHURCH.

14 Q YOU OPPOSED TO FREEDOM OF THE PRESS, ALSO?

15 A I BELIEVE VERY MUCH IN FREEDOM OF THE PRESS.

16 Q AND IF A MAN WRITES A LETTER TO THE NEWSPAPER
17 AND THE NEWSPAPER CHOOSES TO INCLUDE HIS LETTER IN AN
18 ARTICLE THEY MAY BE WRITING, YOU CONSIDER THE FREEDOM OF
19 THAT MAN'S EXPRESSION AS AN ATTACK UPON YOU AND YOUR CHURCH?

20 A WHEN IT IS UNTRUTH.

21 Q I ASSUME IN THE COURSE OF THE LETTER WRITING,
22 THE CHURCH HAS HAD THE OPPORTUNITY TO WRITE LETTERS BACK TO
23 THE NEWSPAPERS?

24 A AS I SAID, IT WAS A CONTINUOUS ATTACK.

25 Q NOW WITH REGARD TO MY QUESTION, WOULD I BE
26 CORRECT IN ASSUMING THAT THE CHURCH HAS HAD THE OPPORTUNITY
27 TO WRITE LETTERS TO THE NEWSPAPER, ALSO?

28 A SOMETIMES YES, I THINK SOMETIMES NO. I THINK

1 SOMETIMES THE CHURCH WAS FORCED TO BUY SPACE IN SOME CASES.

2 Q FOR THE FULL-PAGE AD THAT YOU PUT IN THE PAPER?

3 A NO. BECAUSE CERTAIN LETTERS WOULD NOT BE
4 PRINTED IF I RECALL. IT'S BEEN A LONG TIME, BUT I SEEM TO
5 RECALL THAT THERE WERE A FEW TIMES WHEN WE HAD SPECIFIC
6 LETTERS THAT WE ASKED TO BE PRINTED IN REBUTTAL AND THOSE
7 PARTICULAR LETTERS WERE NOT REPRINTED.

8 Q WASN'T THERE A 20-PAGE LETTER WRITTEN BY MR.
9 FRANCIS THAT HE WAS VERY UPSET WITH THAT THE CHURCH WOULD
10 NOT INCLUDE -- EXCUSE ME, THAT THE NEWSPAPER WOULD NOT
11 INCLUDE IN ITS ENTIRETY? IS THAT THE ONE YOU HAVE REFERENCE
12 TO?

13 A I DO NOT RECALL THE SPECIFIC LETTER.

14 Q WELL, LET ME HELP YOU REMEMBER THE LETTER. I
15 HAVE HERE A TYPED WRITTEN LETTER OF EIGHT PAGES. THE LETTER
16 IS DATED FEBRUARY THE 2ND, 1981. IT IS A LETTER ADDRESSED
17 TO A LADY AND ALSO TO THE READERS OF THE LAS VIRGENES
18 ENTERPRISES AND IT IS EIGHT PAGES LONG TYPEWRITTEN PAGES. I
19 ASSUME IT WOULD TAKE A GOOD PORTION OF AT LEAST ONE SHEET OF
20 ANY NEWSPAPER.

21 ARE YOU FAMILIAR WITH THIS LETTER?

22 A NO, I AM NOT.

23 Q WHY DON'T YOU TAKE A PEEK AT IT ANYWAY.

24 IS THAT THE LETTER THAT MR. FRANCIS WANTED THE
25 NEWSPAPER TO PUBLISH IN ITS ENTIRETY?

26 A I DON'T RECALL WHAT LETTER IT WAS. THERE WERE
27 PERIODS OF THIS -- DURING THIS TIME PERIOD WHEN I WAS
28 TRAVELING AROUND THE COUNTRY AND SOME OF THESE THINGS WERE

1 BEING CARRIED ON AT CAMELOT WHILE I WAS NOT THERE.

2 Q SO MR. MULL WROTE A LETTER TO THE NEWSPAPER AND
3 EDWARD FRANCIS WROTE A LETTER IN REBUTTAL THAT WAS EIGHT
4 TYPEWRITTEN PAGES LONG. AND BECAUSE THE CHURCH WAS DENIED
5 THE OPPORTUNITY TO INCLUDE THAT LETTER IN ITS ENTIRETY, THAT
6 WAS AN ATTACK BY MR. MULL AGAINST THE CHURCH AND THAT IS WHY
7 YOU SUED HIM?

8 A THE LETTER WRITING WAS ONE OF THE FACTORS, YES.

9 Q HIS CONCERN THAT THERE MIGHT BE A VIOLATION OF
10 THE BUILDING CODES IN HIS LETTER TO THE DEPARTMENT OF
11 BUILDING AND SAFETY, THAT IS ANOTHER REASON WHY YOU SUED
12 HIM?

13 A I WOULDN'T CHARACTERIZE IT AS HIS CONCERN, NO.
14 I WOULD CHARACTERIZE IT AS AN ATTACK BECAUSE HE COULD HAVE
15 COME TO US AND TOLD US ABOUT THOSE THINGS DURING THE TIME
16 THAT HE WAS WITH US. INSTEAD, HE WAITED UNTIL AFTER HE WAS
17 GONE.

18 AND EVEN THEN INSTEAD OF TALKING TO US ABOUT
19 IT, HE COMPLAINED TO THE BUILDING DEPARTMENT. AND THE
20 BUILDING DEPARTMENT NEVER CITED US FOR ANY PROBLEMS THAT
21 WERE VIOLATIONS OF THE CODE AS FAR AS STRUCTURAL VIOLATIONS
22 OR ANYTHING LIFE THREATENING OR THREATENING TO PEOPLE.

23 SO THE MANNER IN WHICH HE DID IT I CONSIDERED
24 TO BE AN ATTACK.

25 Q HE NEVER CAME TO YOU TO DISCUSS IT WITH YOU.

26 DO YOU RECALL HAVING TESTIFIED ABOUT A SQUARE
27 DANCE A LITTLE BIT EARLIER IN YOUR TESTIMONY?

28 A YES.

1 Q WASN'T THAT GREGORY MULL YOU WERE TALKING ABOUT
2 WHO CAME OUT TO THE CHURCH PREMISES AND TOLD THE GUARD HE
3 WOULD LIKE TO MEET WITH ELIZABETH CLARE PROPHET? WASN'T
4 THAT THE SAME GREGORY MULL THAT WE ARE TALKING ABOUT?

5 A I DON'T KNOW WHAT HE TOLD --

6 Q HE WAS DENIED ENTRANCE AT THAT TIME, WAS HE
7 NOT?

8 A SHALL I ANSWER YOUR FIRST QUESTION?

9 I DON'T KNOW THAT HE SAID TO ANYONE THAT HE WAS
10 THERE TO SEE ELIZABETH CLARE PROPHET. I DO KNOW HE WAS
11 DENIED ENTRANCE. I ALSO KNOW THAT HE DID NOT CALL IN
12 ADVANCE TO FIND OUT IF SHE WAS THERE OR MAKE ANY ATTEMPT TO
13 SET UP AN APPOINTMENT TO SEE HER.

14 Q THAT WAS A PUBLIC -- IT WAS A SQUARE DANCE BY
15 PUBLIC INVITATION, WAS IT NOT?

16 A YES.

17 Q MR. MULL SHOWED UP WITH MISS MALEK AND HER
18 HUSBAND, AND ALSO WITH HIS DAUGHTER AND A LADY FROM THE
19 PRESS, WHICH WOULD CERTAINLY HAVE GIVEN YOU AN OPPORTUNITY
20 TO GET FAIR TREATMENT BY THE PRESS, AND THEY WERE DENIED
21 ENTRANCE, WERE THEY NOT?

22 A MR. MULL WAS. I DON'T RECALL WHETHER ALL THE
23 REST OF THE PEOPLE THAT YOU MENTIONED EVER ASKED TO GO IN
24 WITHOUT MR. MULL OR NOT. AS I SAY, I DIDN'T HEAR ANY OF THE
25 CONVERSATION. I WASN'T PRESENT FOR THAT.

26 Q IS MISS MALEK ALSO AN ENEMY OF THE CHURCH OR
27 SOMEONE WHO HAS ATTACKED THE CHURCH?

28 A IF I WERE TO GUESS, I WOULD HAVE TO SAY SHE

1 WOULD PROBABLY HAVE BEEN DENIED ENTRANCE AT THAT TIME.

2 Q ISN'T IT A FACT SHE HAS GOT A SON IN THE
3 CHURCH?

4 A YES.

5 Q THAT SHE HAS BEEN DENIED OPPORTUNITY TO SEE AND
6 COMMUNICATE WITH ON MANY, MANY OCCASIONS?

7 A NO. I WENT WITH HER SON TO VISIT IN HER HOME
8 ON AT LEAST ONE OCCASION.

9 Q IN THE LAST FIVE YEARS?

10 A WHILE I WAS ON STAFF. I WENT WITH HER SON, AND
11 VISITED WITH HER AND HER HUSBAND IN HER HOME. SO I KNOW FOR
12 A FACT THAT SHE WAS NOT DENIED ACCESS TO HIM.

13 Q ONCE IN THE LAST FIVE YEARS?

14 A THAT IS MY PERSONAL EXPERIENCE. I HAVE NO
15 KNOWLEDGE OF IN ANY WAY THAT SHE WAS DENIED ACCESS TO HIM.

16 Q YOU HAVE MADE THE SUGGESTION THAT MR. MULL DID
17 NOT CONTACT THE CHURCH, DID NOT TRY TO TALK TO YOU.

18 MR. SHEARER, ISN'T IT A FACT THAT THERE WERE
19 MANY, MANY VIOLATIONS OF THE BUILDING CODE THAT WERE COVERED
20 UP BY SOME OTHER KIND OF CONSTRUCTION OR SOME OTHER KIND OF
21 DUPLICITY WHEN THE BUILDING INSPECTORS DID SHOW UP TO
22 INSPECT?

23 A NO, THAT IS NOT A FACT.

24 Q WELL, LET'S TAKE FOR INSTANCE WHERE ALL THE
25 POWER PANELS WERE AT. ISN'T IT A FACT THAT THE FALSE WALL
26 WAS BUILT AROUND THAT TO COMPORT WITH THE OTHER STRUCTURE SO
27 IT WOULD BE AGED TO LOOK LIKE IT HAD BEEN THERE FOR QUITE
28 SOMETIME?

1 A WHICH POWER PANEL, WHICH WALL? I DO KNOW THAT
2 WE GOT ELECTRICAL PERMITS ON OUR CAMPUS. I KNOW THAT WE
3 WENT THROUGH THE PROCESS AND WE DID GET ELECTRICAL PERMITS.

4 Q DID YOU EVER TAKE OUT ANY WALLS OR PUT IN ANY
5 WALLS WITHOUT FOUNDATIONS, WITHOUT PERMITS?

6 A WE NEVER TOOK OUT ANY STRUCTURAL TIMBERS. I
7 DON'T KNOW IF WE TOOK OUT ANY PARTITIONS, PLASTER OR
8 SOMETHING LIKE THAT. WE MIGHT HAVE TAKEN OUT SOME PLASTER,
9 BUT WE DIDN'T REMOVE STRUCTURAL PILLARS.

10 Q DO I UNDERSTAND CORRECTLY THAT YOU ARE ACTUALLY
11 SAYING BECAUSE MR. MULL WROTE A LETTER TO THE DEPARTMENT OF
12 BUILDING AND SAFETY AND SAID IT WARRANTS AN INSPECTION ON
13 THE PREMISES BECAUSE THERE MIGHT BE SOME THINGS THAT ARE NOT
14 UP TO CODE, THAT YOU ACTUALLY CONSIDERED THAT AN ATTACK UPON
15 THE CHURCH?

16 A YES, I DID. FOR THE REASONS THAT I HAVE
17 STATED. THAT HE HAD OPPORTUNITY WHILE HE WAS THE ARCHITECT
18 ON CAMPUS TO DRAW THIS TO OUR ATTENTION AS WELL AS
19 OPPORTUNITY AFTERWARDS TO HAVE BROUGHT IT TO OUR ATTENTION
20 AND HE DID NOT DO SO.

21 Q HOW WAS HE SUPPOSED TO DO THAT WHEN HE CAME OUT
22 THERE AND YOU WOULDN'T EVEN LET HIM IN?

23 A I AM TALKING ABOUT THE JUNE 6TH MEETING, I AM
24 TALKING ABOUT ALL THE TIME HE WAS ON STAFF. THAT IS WHERE
25 HE GAINED THIS SUPPOSED KNOWLEDGE. HE SHOULD HAVE ADVISED
26 US AT THAT TIME.

27 Q THE JUNE 6TH MEETING. IF I RECALL RIGHT ON
28 PAGE 31 OF THE TRANSCRIPT OF THE JUNE 6TH MEETING, YOU TOLD

1 HIM THAT YOU WANTED HIM TO UNDERSTAND JUST A FEW THINGS,
2 THAT IT IS JUST A MEETING FOR A SHARING OF LOVE?

3 A THAT IS HOW I FELT.

4 Q WERE YOU LOVING HIM WHEN YOU GOT HIS LAST
5 \$5,000 -- LAST \$5,500? YOU WERE JUST FULL OF LOVE AT THAT
6 TIME?

7 A THAT IS LIKE ASKING ME IF I BEAT MY WIFE OR
8 SOMETHING.

9 Q THAT IS A QUESTION I WON'T ASK YOU, MR.
10 SHEARER, BECAUSE I AM AFRAID WE MIGHT BE UPSET WITH THE
11 TRUTH.

12 MR. SHEARER, YOU'VE TESTIFIED THAT YOU SAW THE
13 CONTENTS OF ONE CLEARANCE LETTER.

14 A NO, I DIDN'T. I DID NOT SEE THE CONTENTS OF
15 THE LETTER. THE LETTER WAS DISCUSSED AT A BOARD MEETING.

16 Q AND WHO WAS IT THAT DISCUSSED THE CONTENTS OF
17 THE CLEARANCE LETTER WITH YOU?

18 A ELIZABETH CLARE PROPHET.

19 Q DID YOU EVER SIT AROUND WITH THE BOARD OF
20 DIRECTORS AND READ ANY OTHER CLEARANCE LETTERS?

21 A NO.

22 Q OR DISCUSS ANY OTHER CLEARANCE LETTERS?

23 A NO.

24 Q WOULD IT SURPRISE YOU TO KNOW THAT ELIZABETH
25 CLARE PROPHET SAID THAT ON SEVERAL OCCASIONS, WHEN THE
26 CHURCH WAS CONCERNED ABOUT INDIVIDUALS, THAT SEVERAL
27 CLEARANCE LETTERS WERE DISCUSSED?

28 NOW, YOU WERE ON THE BOARD OF DIRECTORS. YOU

1 WERE THE ARCHBISHOP. YOU WERE RIGHT AT THE CORE OF THINGS?

2 A YES.

3 Q ARE YOU SUGGESTING TO THE COURT THAT YOUR
4 RECOLLECTION IS MORE ACCURATE THAN ELIZABETH CLARE
5 PROPHET'S?

6 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. IT
7 CALLS FOR SPECULATION TO ASK HIM THAT QUESTION. HE CAN ASK
8 HIM IF HE EVER HEARD --

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

10 Q BY MR. LEVY: ELIZABETH CLARE PROPHET TESTIFIED
11 TO THE PEOPLE WHO WERE PRESENT AND TO THE FACT THAT SHE HAD
12 DISCUSSED THE CONTENTS OF SEVERAL CLEARANCE LETTERS. THE
13 PEOPLE SHE INCLUDED WHO WERE PRESENT WERE MEMBERS OF THE
14 BOARD OF DIRECTORS, INCLUDING YOURSELF.

15 DOES THAT REFRESH YOUR RECOLLECTION THAT IT
16 MIGHT HAVE BEEN MORE THAN ONE THAT WAS DISCUSSED?

17 A WELL, WHAT I TESTIFIED TO WAS THAT I RECALL ONE
18 TIME THAT A CLEARANCE LETTER WAS DISCUSSED. AND THAT IS
19 WHAT I RECALL.

20 THE BOARD OF DIRECTORS, YOU KNOW, WAS A BOARD
21 OF MAJORITY. AND IT WASN'T A SITUATION WHERE WHENEVER
22 SOMEONE SAYS THE BOARD OF DIRECTORS, THAT EACH AND EVERY
23 BOARD MEMBER WAS NECESSARILY PRESENT AT EACH AND EVERY
24 MEETING.

25 AND OVER THE COURSE OF ALL THE YEARS AT SUMMIT
26 UNIVERSITY, IT IS ENTIRELY POSSIBLE THAT SOMETHING WAS
27 BROUGHT UP ON ANOTHER OCCASION WHEN I WASN'T PRESENT.

28 Q TALKING ABOUT BOARD MEETINGS, YOU SAID THAT THE

1 ONLY TIME SOMEONE WHO WAS NOT ON THE BOARD OF DIRECTORS
2 WOULD BE AT A BOARD MEETING IS WHEN THEY WERE MAKING A
3 PRESENTATION.

4 IS THAT YOUR TESTIMONY?

5 A YES.

6 Q ARE YOU SUGGESTING THAT RANDALL KING, EVEN
7 THOUGH HE WAS NOT A BOARD MEMBER WHEN HE WAS MARRIED TO
8 ELIZABETH, WAS NOT ALLOWED ADMITTANCE TO BOARD MEETINGS?

9 A HE WAS NOT PRESENT, YES.

10 Q I AM SURE HE WAS NOT PRESENT AT SOME. MY
11 QUESTION IS WHEN HE WAS MARRIED TO ELIZABETH AND HE WAS NOT
12 ON THE BOARD, WAS HE DENIED ENTRANCE TO THE BOARD MEETINGS?

13 A TO SAY HE WAS DENIED ENTRANCE OR NOT DENIED
14 ENTRANCE IS NOT REALLY APPROPRIATE. IT WAS A PRACTICAL
15 FASHION OF HIM BEING AT SERVICE WHERE HE WAS NEEDED RATHER
16 THAN SITTING IN ON SOMETHING THAT DIDN'T CONCERN HIM.

17 Q IF HE SO CHOSE TO BE AT A BOARD MEETING, SINCE
18 HE WAS ELIZABETH'S HUSBAND, IF HE DECIDED TO BE THERE, WAS
19 THERE ANY RULE OR ANY REGULATION OR DID YOU TELL HIM TO
20 LEAVE?

21 A NO, I DIDN'T TELL HIM TO LEAVE. NO, THERE WAS
22 NO RULE THAT RANDALL KING COULDN'T BE AT A BOARD MEETING.

23 Q WHEN HE WAS MARRIED TO ELIZABETH CLARE PROPHET,
24 ISN'T IT A FACT THAT WHEN HE CHOSE TO AND IT WAS CONVENIENT
25 FOR HIM, HE PARTICIPATED, SAT IN, LISTENED, DISCUSSED,
26 OFFERED HIS OPINION AND PARTICIPATED IN BOARD MEETINGS EVEN
27 THOUGH HE WASN'T ON THE BOARD?

28 A I AM NOT GOING TO SAY THAT THAT NEVER COULD

1 HAVE HAPPENED, BUT IT DIDN'T HAPPEN WITH ANY DEGREE OF
2 FREQUENCY WHATSOEVER. RANDALL WAS ON A DIFFERENT FACILITY,
3 PROBABLY 15 MILES REMOVED FROM THE CAMELOT PREMISES, AND HE
4 WORKED THERE, AND HE LIVED CLOSE BY TO WHERE HE WORKED AND
5 HE WAS NOT GETTING OVER TO CAMELOT ALL THAT MUCH.

6 Q WHEN HE DID GET OVER THERE SOME OF THAT MUCH
7 AND HE CHOSE TO BE AT A BOARD MEETING, WAS THERE ANYONE OR
8 ANYBODY OR ANYTHING OR ANY RULE THAT PROHIBITED HIM FROM
9 ATTENDING THAT BOARD MEETING?

10 A NO, THERE WAS NO SUCH RULE.

11 Q SO HE COULD VERY WELL HAVE BEEN THERE AT THE
12 BOARD MEETINGS?

13 A IT'S POSSIBLE.

14 Q DO YOU HAVE AN ACCURATE RECOLLECTION AS TO
15 WHETHER OR NOT HE SAT AROUND AT A BOARD MEETING WITH YOU
16 WHEN A GROUP OF THE BOARD AND ELIZABETH DISCUSSED ABOUT WHAT
17 TO DO WITH GREGORY MULL AND WHETHER OR NOT TO INVITE HIM TO
18 COME TO CAMELOT?

19 A YES. MY RECOLLECTION IS THAT THAT WAS A JOB OF
20 THE EXECUTIVE COMMITTEE RATHER THAN A JOB OF THE ENTIRE
21 BOARD. AND THAT THE EXECUTIVE COMMITTEE DEALT WITH THAT
22 MATTER AMONG ITSELF AND THAT WE ONLY INVOLVED ELIZABETH WHEN
23 WE WOULD TAKE THE CONSENSUS OF OUR RECOMMENDATION TO HER.

24 AND I DON'T RECALL RANDALL BEING PRESENT THEN,
25 BUT CERTAINLY HE WASN'T PRESENT FOR WORKING OUT THE NUTS AND
26 BOLTS AND ALL THE WHYS AND WHEREFORES THAT WE WERE GOING TO
27 RECOMMEND TO HER.

28 Q NOW BACK TO MY QUESTION. WHEN THE DISCUSSION

1 WAS GOING ON AS TO WHETHER OR NOT GREGORY MULL SHOULD BE
2 INVITED TO CAMELOT, DO YOU HAVE AN ACCURATE RECOLLECTION AS
3 TO WHETHER OR NOT RANDALL KING ATTENDED ANY OF THOSE
4 MEETINGS?

5 A I RECALL THAT HE DID NOT ATTEND THOSE MEETINGS.

6 Q WAS THERE ANYONE PRESENT WITH YOU WHEN YOU
7 PICKED UP THE PHONE AND ACTUALLY MADE THE CALL TO INVITE
8 GREGORY MULL TO COME TO CAMELOT?

9 A I DON'T RECALL.

10 Q WERE YOU DELEGATED BY THE EXECUTIVE COMMITTEE
11 OR THE BOARD OF DIRECTORS TO BE THE PARTY TO MAKE CONTACT
12 WITH GREGORY MULL?

13 A YES.

14 Q NOW, SINCE YOU WERE THE ARCHBISHOP, WHEN YOU
15 WERE DIRECTED BY THE EXECUTIVE COMMITTEE AND THE BOARD OF
16 DIRECTORS, WERE YOU TRUSTED TO BE ABLE TO HANDLE A CALL LIKE
17 THAT ALL BY YOURSELF?

18 A YES.

19 Q SO YOU DIDN'T HAVE ELIZABETH LOOKING OVER YOUR
20 SHOULDER?

21 A NO. AS I STATED EARLIER, THOSE PHONE -- THAT
22 PHONE CALL OR THOSE PHONE CALLS WERE PRELIMINARY. THEY WERE
23 EXPLORATORY IN NATURE. IT WASN'T THE KIND OF THING WHERE
24 ANY FINAL DECISION WAS GOING TO BE MADE IN ANY CASE. SO WHY
25 SHOULDN'T I BE ABLE TO OPEN UP THE DISCUSSION WITH GREGORY?

26 Q SO THAT I UNDERSTAND AND THE COURT UNDERSTANDS
27 CORRECTLY, ARE YOU SAYING THAT MR. MULL, ON THE BASIS OF
28 PRELIMINARY DISCUSSIONS, GAVE UP EVERYTHING HE WAS INVOLVED

1 IN --

2 A NO.

3 Q THIS TIME YOU LET ME FINISH THE QUESTION,
4 PLEASE.

5 GAVE UP EVERYTHING HE WAS INVOLVED IN -- HIS
6 BUSINESS, HIS LIFE IN SAN FRANCISCO -- TO COME TO CAMELOT
7 FOR NO SALARY, NO GUARANTEE OF PAYMENT, NOTHING OTHER THAN
8 THE POSSIBILITY OF DISCUSSING WITH YOU THE POTENTIAL FOR HIM
9 DOING SOME REMODELING WORK AT CAMELOT?

10 A THERE ARE SO MANY THINGS YOU ARE ASKING ME
11 THERE, I DON'T KNOW. IF YOU WILL BREAK THAT UP INTO ONE
12 QUESTION AT A TIME, I WILL BE VERY HAPPY TO ANSWER IT.

13 BUT THAT IS SUCH A LONG THING WITH SEVERAL
14 PARTS TO IT AND I AM NOT -- BUT I AM PAYING ATTENTION TO
15 WHAT YOU ARE SAYING. BUT BY THE TIME YOU HAVE FINISHED, I
16 HAVE FORGOTTEN THE FIRST PART OF YOUR QUESTION.

17 Q LET ME ASK YOU ANOTHER QUESTION AND SEE IF YOU
18 RECALL THAT.

19 DOES THE CHURCH HAVE DOSSIERS ON PEOPLE,
20 MEMBERS, COMMUNITY MEMBERS, STAFF MEMBERS, PERMANENT STAFF
21 MEMBERS?

22 A WE KEEP A FILE ON INDIVIDUAL STAFF MEMBERS.

23 Q WHAT IF SOMEBODY COMES TO THE CHURCH AND DECIDE
24 TO GO TO A QUARTER AT SUMMIT UNIVERSITY AND AFTER SEVERAL
25 DAYS DECIDES, "HEY, I CAN'T HANDLE THIS," AND THEY LEAVE AND
26 THAT PERSON ATTENDED FIVE OR SIX OR SEVEN OR TEN YEARS AGO.

27 DO YOU KEEP ALL OF THOSE RECORDS ON THOSE
28 PEOPLE WHO FELL BY THE WAYSIDE?

1 A I DON'T KNOW HOW LONG THOSE RECORDS ARE KEPT.

2 Q YOU ARE THE ARCHBISHOP, YOU ARE ON THE BOARD OF
3 DIRECTORS, YOU ARE ASSOCIATED FOR 14 YEARS WITH THIS
4 ORGANIZATION, AND YOU DON'T KNOW THE RULES AND REGULATIONS
5 AND WHAT THE CHURCH DOES?

6 A I KNOW A LOT OF THE RULES AND A LOT OF THE
7 REGULATIONS, BUT I DON'T KNOW HOW LONG A RECORD WOULD BE
8 KEPT FOR A PERSON WHO WAS THERE FOR FOUR OR FIVE DAYS. I
9 JUST CAN'T RECALL ANY OFFICIAL POLICY ON WHAT OUR POLICY IS
10 ON KEEPING THE RECORDS ON SOMEONE WHO IS THERE FOR FOUR OR
11 FIVE DAYS.

12 Q IN YOUR EXPERIENCE WHEN YOU WERE -- DID THE
13 ANSWER COME OVER HERE?

14 A EXCUSE ME, NO. I AM --

15 Q I THOUGHT MAYBE I WAS MAKING YOU NERVOUS THE
16 WAY YOU WERE LOOKING AROUND. I DIDN'T WANT TO DO THAT.

17 MR. KLEIN: I AM GOING TO OBJECT TO THAT
18 CHARACTERIZATION, YOUR HONOR.

19 Q BY MR. LEVY: IN YOUR EXPERIENCE, WHEN YOU WERE
20 VICE PRESIDENT AND YOU WERE ON THE BOARD OF DIRECTORS AND
21 YOU WERE ON THE EXECUTIVE COMMITTEE AND YOU WERE HEADMASTER
22 AND YOU WERE THE DEAN AND YOU WERE SOME OF EVERYTHING, WAS
23 IT THE CHURCH POLICY AT THAT TIME TO KEEP RECORDS ON ANYBODY
24 WHO IN ANY WAY CAME IN CONTACT WITH THE CHURCH?

25 A THAT IS A VERY UNIVERSAL QUESTION. I'D HAVE TO
26 SAY WE DIDN'T KEEP RECORDS ON ANYBODY WHO EVER CAME INTO
27 INTO CONTACT WITH THE CHURCH.

28 Q IF SOMEONE HAD COME THROUGH SUMMIT UNIVERSITY

1 BUT ONLY STAYED THERE SEVERAL DAYS, SINCE YOU WERE THE DEAN
2 OF STUDENTS AT SUMMIT UNIVERSITY -- LET ME ASK YOU IN THAT
3 CAPACITY -- AS DEAN, WAS IT THE POLICY TO KEEP PERMANENT
4 RECORDS ON THE PEOPLE WHO CAME THROUGH THERE AND STAYED
5 THERE FOR AS SHORT A PERIOD OF TIME AS A WEEK?

6 A I -- YOU KNOW, IT IS ENTIRELY POSSIBLE WE KEPT
7 THOSE RECORDS FOR A PERIOD OF TIME. HOW LONG, I DON'T KNOW.

8 Q WAS IT YOUR POLICY WHEN SOMEONE LEFT SUMMIT
9 UNIVERSITY PRIOR TO COMPLETING THEIR THREE MONTHS FOR THEM
10 TO HAVE AN EXIT SESSION WITH YOURSELF?

11 A YES.

12 Q PRIOR TO HAVING THE EXIT SESSION, WAS IT ALSO
13 THE NORMAL COURSE OF EVENTS FOR THEM TO HAVE SESSIONS WITH
14 DR. RALPH YANEY?

15 A NO.

16 Q IN YOUR EXIT SESSION, WERE YOU PRIVY TO THE
17 DOCUMENTS OF RALPH YANEY?

18 A NO.

19 Q THERE WAS TESTIMONY IN THIS COURTROOM BY A MAN
20 WHO WAS AT SUMMIT UNIVERSITY FOR AS SHORT A PERIOD OF TIME
21 AS SOME SEVEN OR EIGHT DAYS WHO TESTIFIED UNDER OATH IN THIS
22 COURT THAT WITH HIS EXIT SESSION WITH YOU, HE SAW SITTING ON
23 YOUR DESK THE INTERVIEW SHEETS THAT HE HAD WITH DR. RALPH
24 YANEY.

25 NOW I ASK YOU AGAIN, IS IT THE NORMAL COURSE OF
26 EVENTS FOR STUDENTS AT SUMMIT UNIVERSITY OR MEMBERS AT
27 CAMELOT, FOR THE BOARD OF DIRECTORS TO HAVE INFORMATION
28 FURNISHED TO THEM BY THE PSYCHIATRIST WHO IS ASSOCIATED WITH

1 THE CHURCH?

2 A NO, IT WAS NOT. DEFINITELY NOT. I MEAN I WAS
3 ON THE BOARD. I KNEW RALPH YANEY, BUT WE JUST DID NOT HAVE
4 SESSIONS WHERE WE REVIEWED HIS CONSULTATIONS WITH PEOPLE. I
5 DIDN'T -- LET'S PUT IT THIS WAY, I DIDN'T HAVE SUCH
6 DISCUSSIONS, WITH RALPH YANEY.

7 Q DO YOU KNOW WHETHER OR NOT ELIZABETH CLARE
8 PROPHET DID?

9 A NOT TO MY KNOWLEDGE.

10 Q YOU'VE LABELED THE TELEPHONE CONVERSATIONS YOU
11 HAD WITH GREGORY MULL AS EXPLORATORY CONVERSATIONS TO
12 DETERMINE WHETHER OR NOT AN ARRANGEMENT COULD BE MADE
13 BETWEEN MR. MULL AND THE CHURCH; IS THAT CORRECT?

14 A OKAY.

15 Q IS IT --

16 A YES. THAT IS ONE OF THE THINGS I SAID, YES.

17 Q ISN'T IT A FACT THAT AFTER YOUR INVITATION TO
18 GREGORY MULL, HE WAS AT THE CHURCH WITHIN A PERIOD OF TIME
19 LESS THAN TWO WEEKS?

20 A WELL, I RECALL OUR CONVERSATION OCCURRING IN
21 DECEMBER.

22 Q AND HIM COMING IN JANUARY?

23 A AROUND THE 17TH, YES.

24 Q WE HAVE HAD TESTIMONY BY ELIZABETH THAT HE GOT
25 THERE BEFORE THE 17TH. IS YOUR RECOLLECTION NOW DIFFERENT
26 FROM HERS?

27 A I GUESS SO. MINE IS BASED ON THE DATE OF HIS
28 APPLICATION. THAT IS THE REASON I -- MY MEMORY WAS

1 REFRESHED BY THE APPLICATION. I THOUGHT THE APPLICATION
2 SAID THE 17TH.

3 Q AND YOU INVITED HIM AND THEN YOU REQUIRED AN
4 APPLICATION FOR HIM BEING THERE?

5 A YES. PEOPLE WHO WERE GOING TO VOLUNTEER TIME
6 ON THE STAFF FILLED OUT AN APPLICATION.

7 Q IF YOU CALLED HIM AND YOU INVITED HIM, HOW DO
8 YOU TURN THAT INTO HIM APPLYING TO BE ON THE STAFF?

9 A YOU HAVE TO APPLY BEFORE YOU COULD BE ACCEPTED.

10 Q YOU INVITE HIM AND THEN HE IS REQUIRED TO
11 APPLY?

12 A YES. YOU STILL GO THROUGH THE STEPS. I MEAN
13 THERE ARE HUNDREDS OF PEOPLE THAT WERE SERVED AT VARIOUS
14 TIMES, AND WE HAD ROUTINE FASHION THAT PEOPLE CAME ONTO
15 STAFF AND ONE OF THEM WAS THEY FILLED OUT A STAFF
16 APPLICATION.

17 MR. LEVY: EXCUSE ME JUST A MOMENT, YOUR HONOR. MAY
18 I HAVE JUST A MOMENT?

19 (COUNSEL CONFER SOTTO VOCE.)

20 Q BY MR. LEVY: MR. SHEARER, WHILE YOU WERE WITH
21 THE CHURCH, DID A TIME COME WHEN SOMEBODY WHO WAS ASSOCIATED
22 WITH THE CHURCH WHO WAS ON THE BOARD OF DIRECTORS WROTE A
23 LETTER AS A SPOKESMAN FOR THE CHURCH TO A LOCAL PAPER IN THE
24 CALABASAS OR AGOURA AREA WHERE THEY IN FACT LABELED GREGORY
25 MULL AND SEVERAL OTHER EX-CHURCH MEMBERS AS HOMOSEXUALS?

26 A I DON'T HAVE ANY KNOWLEDGE OF SUCH A LETTER
27 MYSELF.

28 Q HAVE THERE BEEN ANY OCCASIONS, TO YOUR

1 KNOWLEDGE, WHERE PEOPLE WHO HAVE LEFT THE CHURCH WHO HAVE
2 SPOKEN OUT ABOUT THE CHURCH WERE REFERRED TO AS SNAKE OIL
3 PEDDLERS BY PEOPLE ON THE BOARD OF DIRECTORS OR PEOPLE WHO
4 WERE ASSOCIATED IN OFFICIAL CAPACITY WITH CHURCH UNIVERSAL
5 AND TRIUMPHANT?

6 A I HAVE NEVER HEARD THE TERM "SNAKE OIL
7 PEDDLERS" USED BY -- IN THE CONTEXT YOU JUST DESCRIBED.

8 Q HAVE YOU EVER SEEN MURRAY STEINMAN'S LETTER TO
9 THE NEWSPAPER WHERE HE TAKES TO ISSUE ANYONE WHO MAY HAVE
10 LEFT THE CHURCH AND HAVE AN OPINION NOT IN KEEPING WITH THE
11 CHURCH'S?

12 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT TO THE
13 QUESTION AS TO RELEVANCE AND ALSO SPECULATION SINCE THIS
14 WITNESS SAID HE HAD NEVER SEEN IT.

15 THE COURT: OVERRULED.

16 THE WITNESS: I LOST TRACK OF YOUR QUESTION.

17 Q BY MR. LEVY: THE JUDGE SAID IT IS OKAY FOR YOU
18 TO ANSWER THE QUESTION.

19 A I KNOW. BUT BY THAT EXCHANGE, I LOST TRACK OF
20 THE QUESTION. IF I COULD JUST HEAR THE QUESTION AGAIN.

21 Q LET ME TRY TO REPEAT IT FOR YOU.

22 DID YOU EVER BECOME AWARE THAT MURRAY STEINMAN,
23 AS A REPRESENTATIVE OF THE CHURCH, WROTE AN ARTICLE TO THE
24 NEWSPAPERS WHERE HE TOOK ISSUE AND LABELED PEOPLE WITH LESS
25 THAN POLITE NAMES BECAUSE THOSE PEOPLE WERE NO LONGER
26 ASSOCIATED WITH THE CHURCH?

27 A I AM NOT DENYING THAT THAT EVER HAPPENED. IT
28 COULD HAVE HAPPENED. AS I SAY, I SPENT A GREAT DEAL OF MY

1 TIME TRAVELING AROUND THE COUNTRY AND I WAS NOT ALWAYS
2 PRESENT. SO -- BUT I PERSONALLY DON'T RECALL ANY SUCH
3 LETTER.

4 Q AND YOU WERE OUT OF TOWN WHEN ANYTHING OF ANY
5 SUBSTANCE HAPPENED?

6 A I -- NO, I WASN'T OUT OF TOWN WHEN EVERYTHING
7 OF SUBSTANCE HAPPENED.

8 Q DO YOU DECREE, ALSO?

9 A YES, I DO DECREE.

10 Q HAVE YOU EVER HEARD OF THE DECREE CALLED --
11 WELL, I AM NOT SURE EXACTLY WHAT IT IS CALLED, BUT I THINK
12 IT HAS SOMETHING TO DO WITH BLUE BOLTS. DOES THAT SOUND
13 FAMILIAR?

14 A SOUNDS -- YES. BLUE LIGHTNING BOMBS OR
15 SOMETHING LIKE THAT. I DON'T KNOW.

16 Q I WONDER, SO THAT THE COURT CAN GET AN IDEA
17 JUST HOW ONE OF THOSE DECREES GOES, IF YOU WOULD BE KIND
18 ENOUGH TO STAND UP FOR US AND DECREE ONE TIME WITH REGARD TO
19 BLUE BOMBS.

20 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT AS TO
21 THE RELEVANCE AND AS TO FREEDOM OF RELIGION, FIRST AMENDMENT
22 GROUNDS.

23 THE COURT: SUSTAINED.

24 Q BY MR. LEVY: DID YOU EVER SEND ANYONE, WHILE
25 YOU WERE THE ARCHBISHOP, TO GO AND DECREE IF THEY CAME TO
26 YOU WITH A PROBLEM?

27 A PROBABLY, YES.

28 Q WHAT WAS THE PURPOSE OF THEM GOING TO DECREE

1 WHEN THEY HAD A PROBLEM?

2 A WELL, WE BELIEVED THAT WHEN YOU INVOKE THE HOLY
3 SPIRIT THROUGH DECREERING, THAT THE HOLY SPIRIT CAN TRANSMUTE
4 OR PURIFY ONE'S OWN WORLD TO HELP YOU SEE MORE CLEARLY AS
5 WELL AS TO HELP YOU CORRECT THE CAUSE AND THE SPIRITUAL
6 CAUSE BEHIND THE PROBLEM THAT YOU ARE FACING.

7 Q WHEN YOU USE THE TERM "INVOKE," DOES THAT MEAN
8 ASK THE HOLY SPIRIT?

9 A YES.

10 Q ISN'T IT A FACT THAT A DECREE IS NOT A PLEA,
11 BUT IT IS IN FACT ALMOST A COMMAND BY THE PERSON EMPLOYING
12 THE DECREE AS OPPOSED TO A PRAYER?

13 MR. KLEIN: YOUR HONOR, I AM GOING TO OBJECT ON
14 RELEVANCE AND ON FIRST AMENDMENT GROUNDS.

15 THE COURT: HE CAN ANSWER.

16 THE WITNESS: WELL, ONE OF THE THINGS YOU HAVE TO
17 REMEMBER ABOUT THE CONCEPT OF DECREERING IS THAT THE DECREE
18 IS BEING ISSUED BY THE PART OF THE INDIVIDUAL THAT WE
19 BELIEVE IS ONE WITH GOD. AND IT IS THAT PART OF THE
20 IN-DWELLING PRESENCE OF GOD THAT HAS THE AUTHORITY TO DECREE
21 RATHER THAN THE OUTER PERSONALITY. AND THAT IT IS THAT PART
22 OF THE HOLY SPIRIT WITHIN US THAT GIVES THAT DECREE.

23 Q BY MR. LEVY: ISN'T IT A FACT THAT THERE IS A
24 DIFFERENCE IN A PRAYER AND A DECREE?

25 A YES.

26 Q AND ISN'T IT A FACT THAT WHEN YOU PRAY, YOU
27 ASK; AND WHEN YOU DECREE, YOU COMMAND?

28 A THAT IS AN OVERSIMPLIFICATION, BUT IT'S ALL

1 RIGHT TO SAY THAT I SUPPOSE.

2 Q DID YOU EVER INCLUDE GREGORY MULL'S NAME IN AN
3 INSERT ON A DECREE WHERE DECREES WERE BEING USED --
4 CERTAINLY I HAVE LEARNED THIS MUCH -- NOT AGAINST GREGORY
5 MULL, BUT AGAINST HIS ENERGY?

6 A IT IS ENTIRELY POSSIBLE. IF I NAME MYSELF OR
7 MY OWN CHILDREN IN A DECREE, I CERTAINLY WOULDN'T HESITATE
8 TO NAME GREGORY MULL IN A DECREE.

9 MR. LEVY: I AM GOING TO ASK THAT EVERYTHING OTHER
10 THAN "YES" BE STRICKEN AS NOT RESPONSIVE TO THE QUESTION AND
11 SELF-SERVING, YOUR HONOR.

12 THE COURT: MOTION IS GRANTED. EVERYTHING AFTER THE
13 WORD "YES" IS STRICKEN. THE JURY IS DIRECTED TO DISREGARD
14 IT.

15 MR. KLEIN: YOUR HONOR, I BELIEVE HIS ANSWER WAS, "IT
16 IS ENTIRELY POSSIBLE." I DON'T KNOW IF THE ANSWER WAS
17 "YES." I THINK HE STARTED OUT WITH, "IT IS ENTIRELY
18 POSSIBLE." I MAY BE WRONG.

19 THE COURT: I THOUGHT I HEARD IT, TOO. LET'S CHECK
20 IT.

21 (THE REPORTER READ THE RECORD AS FOLLOWS:

22 "A IT IS ENTIRELY POSSIBLE.")

23 THE COURT: ALL RIGHT. THOSE WORDS REMAIN.
24 EVERYTHING AFTER THAT IS STRICKEN.

25 Q BY MR. LEVY: LET ME SHOW YOU AN INSERT AGAINST
26 PERSONAL AND IMPERSONAL HATRED. ARE YOU FAMILIAR WITH THIS
27 DECREE?

28 A I RECALL THIS DECREE, YES. I HAVEN'T GIVEN IT

1 RECENTLY.

2 Q NOW, WITH THAT FERVENT PRAYER, I WOULD ASK YOU
3 TO LOOK AT THE BACK OF IT.

4 ARE YOU TELLING ME THAT YOU WOULD PUT YOUR
5 CHILDREN'S NAME IN THAT DECREE WHERE THE PLACE OF THE BLANK
6 LINE IS?

7 A I WOULDN'T HESITATE TO PUT MY CHILDREN'S NAME
8 IN THERE. I WOULDN'T HESITATE TO PUT MY CHILDREN'S NAME
9 ANYWHERE BECAUSE I DON'T BELIEVE THAT DECREES WOULD HARM
10 THEM OR ANYONE ELSE.

11 Q I AM GOING TO READ TO YOU JUST THAT LAST
12 PARAGRAPH. (READING.)

13 "BELOVED MIGHTY ASTREA AND
14 PURITY AND LEGIONS OF LIGHT, LOCK YOUR
15 COSMIC CIRCLES AND SWORDS OF BLUE FLAME IN,
16 THROUGH, AND AROUND ALL MALIGNING OF THE
17 MESSENGERS AND STAFF BY DEPROGRAMMERS, THE
18 CLOCK OF BETRAYERS, FUNDAMENTALISTS,
19 LAGGARDS AND FALLEN ONES," BLANK SPACE FOR
20 YOUR CHILDREN'S NAME, "AND ALL INDIVIDUALS
21 INFLUENCED THEM. SEIZE, PIN, AND BIND!
22 SERPENT AND HIS SEED, THEIR MECHANIZATION
23 CONCEPT AND EVERY ANTI HOLY SPIRIT,
24 MANIFESTATION IN CAMELOT, AMERICA, AND THE
25 WORLD!"

26 YOU'D INCLUDE YOUR CHILDREN'S NAME IN THERE
27 WITH THE FALLEN ONES AND THE BETRAYERS?

28 A WELL, LOGICALLY THEIR NAMES WOULD NOT BELONG IN

1 THAT LIST. BUT I WOULDN'T HESITATE PUTTING THEM IN THERE
2 FOR FEAR IT WOULD HARM THEM.

3 Q MY QUESTION TO YOU BEFORE WAS DID YOU PUT MR.
4 GREGORY MULL'S NAME IN YOUR DECREES WHILE YOU WERE AT CHURCH
5 UNIVERSAL AND TRIUMPHANT?

6 A I DON'T RECALL BACK FOUR YEARS AGO USING
7 GREGORY MULL'S NAME IN A DECREE.

8 Q YOU HAVE GOT A PRETTY ACCURATE MEMORY FOR MOST
9 EVERYTHING ELSE. YOU DON'T RECALL FOUR YEARS AGO, SIR?

10 A I JUST GAVE YOU MY ANSWER.

11 MR. LEVY: WELL, I DON'T WANT TO TEST YOUR
12 RECOLLECTION ANY FURTHER. THANK YOU VERY MUCH, SIR.

13 THE COURT: ANY QUESTIONS?

14 MR. KLEIN: YES, YOUR HONOR.

15

16 REDIRECT EXAMINATION +

17 BY MR. KLEIN:

18 Q MR. SHEARER, MR. LEVY ASKED YOU SOME QUESTIONS
19 ABOUT WHETHER MR. KING COULD HAVE BEEN AT BOARD MEETINGS.
20 HE ASKED YOU WOULD MR. KING HAVE BEEN BARRED FROM BOARD
21 MEETINGS. I AM GOING TO ASK YOU THIS QUESTION.

22 DO YOU RECALL RANDALL KING ACTUALLY BEING AT
23 ANY BOARD MEETINGS IN THE YEARS 1978 OR '79 WHEN HE WASN'T
24 MAKING A PRESENTATION TO THE BOARD?

25 A I WOULD SAY THAT PROBABLY SOMETIME DURING ALL
26 THOSE YEARS, HE MIGHT HAVE HAD DINNER WITH US AT THE SAME
27 TIME THAT SOME MATTERS WERE DISCUSSED. THAT CERTAINLY COULD
28 HAVE HAPPENED A FEW TIMES.

1 Q THE QUESTION IS DO YOU RECALL AS YOU SIT HERE
2 NOW?

3 A I CAN'T RECALL A SPECIFIC INSTANCE.

4 Q I AM GOING TO READ YOU FROM PAGE 212, LINE 4,
5 THROUGH PAGE 212, LINE 20, FROM THE TRANSCRIPT OF ELIZABETH
6 CLARE PROPHET. THAT IS THE SECTION THAT CAME AFTER WHAT MR.
7 LEVY READ. I WOULD LIKE YOU TO LISTEN TO IT AND TELL ME IF
8 THIS ACCURATELY DESCRIBES THE ROLE OF ELIZABETH CLARE
9 PROPHET. QUESTION BY MR. LEVY: (READING.)

10 "DO YOU HAVE ANY
11 RECOLLECTION AT ANY TIME OF YOU HAVING THE
12 LAST WORD AND THE EXECUTIVE BOARD OVERRULING
13 YOU?

14 "A YES.

15 "Q ON WHAT OCCASIONS WHILE
16 MR. MULL WAS ASSOCIATED WITH CHURCH
17 UNIVERSAL AND TRIUMPHANT DID THEY DO THAT?

18 "A I DON'T KNOW THE SPECIFIC
19 OCCASIONS.

20 "Q IS IT SOMETHING THAT
21 HAPPENS ALL THE TIME?

22 "A WHEN I FUNCTION AS A
23 BOARD MEMBER, AND OTHER BOARD MEMBER'S VOTE
24 MAY VETO SOMETHING I WISH TO DO. I THOUGHT
25 YOU WERE TALKING ABOUT SPIRITUAL MATTERS AND
26 DISPUTES AND RESOLUTIONS, WHICH IS WHAT I
27 ANSWERED ON THE LAST QUESTION. PROBLEMS AND
28 ARGUMENTS BETWEEN PEOPLE AND SO FORTH.

1 "Q WHAT ABOUT BUSINESS
2 MATTERS?

3 "A LEGAL, FINANCIAL BUSINESS
4 MATTERS ARE SUBJECT TO THE BOARD'S
5 DECISION."

6 IS THAT TESTIMONY CONSISTENT WITH YOUR
7 UNDERSTANDING OF ELIZABETH CLARE PROPHET'S ROLE WITH RESPECT
8 TO BUSINESS AND FINANCIAL MATTERS?

9 A YES.

10 Q IN THAT DRAWING ON THE BOARD BEHIND YOU THAT
11 MR. LEVY SO ARTFULLY DREW, AND I AM POINTING TO THAT TABLE,
12 THE DESK WITH ELIZABETH CLARE PROPHET ON ONE SIDE, AS IT IS
13 DRAWN, THE THREE BOXES FOR ED FRANCIS, GREGORY MULL AND
14 MONROE SHEARER, THEY ARE ALL TOUCHING.

15 IN FACT, DURING THAT MEETING WITH MR. MULL,
16 WERE THE CHAIRS OR THE PEOPLE ON THAT SIDE OF THE DESK
17 TOUCHING EACH OTHER IN ANY WAY?

18 A NO, THEY WERE NOT. PROBABLY A FOOT OF SPACE OR
19 SO AT LEAST BETWEEN THE CHAIRS.

20 Q WAS THERE ANY ARRANGEMENT PRIOR TO THE MEETING
21 BETWEEN YOU AND MR. FRANCIS AND ELIZABETH CLARE PROPHET AS
22 TO GREGORY MULL WOULD SIT RIGHT IN BETWEEN MR. FRANCIS AND
23 YOU?

24 A NO, THERE WASN'T. AS I SAID, THE CHAIRS WERE
25 ALWAYS LIKE THAT IN THE ROOM.

26 Q MR. LEVY MENTIONED THE BIBLICAL STORY IN THE
27 MEETING OF JUNE 6, 1980, THAT WAS READ DURING THAT MEETING.

28 AFTER THE READING OF THAT BIBLICAL STORY, DO

1 YOU RECALL WHETHER GREGORY MULL ASKED ELIZABETH CLARE
2 PROPHET IF SHE WAS TELLING HIM BY THAT STORY THAT HE WAS
3 GOING TO DIE?

4 A YES.

5 Q AND YOU RECALL WHAT HER RESPONSE WAS?

6 A SHE SAID IMMEDIATELY, "ABSOLUTELY NOT."

7 Q YOU TALKED ABOUT WHY MR. MULL WAS ASKED TO
8 LEAVE CAMELOT. YOU MENTIONED THAT THEY WANTED THE ROOM.

9 WAS THERE ANY OTHER REASON THAT MR. MULL WAS
10 ASKED TO LEAVE CAMELOT IN MAY OF 1980?

11 A ESSENTIALLY WE REACHED AN IMPASSE WHERE GREGORY
12 WAS UNWILLING TO ADMIT TO ANY PART OF THE DEBT THAT HE OWED
13 THE CHURCH AND UNWILLING TO MAKE ANY ARRANGEMENTS AT ALL
14 REGARDLESS OF HOW LONG THE REPAYMENT TIME WOULD HAVE BEEN IN
15 ORDER TO REPAY THAT DEBT.

16 AND WE THOUGHT THAT WITH THE PAYMENT OF I THINK
17 IT WAS ROUGHLY 50- OR \$65,000 THAT HE HAD COMING DUE IN
18 THREE YEARS, WE OFFERED TO DELAY PAYMENT UNTIL THAT TIME OR
19 WHATEVER TIME IT WAS CONVENIENT FOR HIM. BUT HE WAS
20 INTRANSIGENT ON DOING ANYTHING AT ALL.

21 Q AT THE TIME OF THE MEETING IN MAY OF 1980 WITH
22 MR. MULL, YOURSELF, MR. FRANCIS, WERE YOU AWARE AT THE TIME
23 OF THAT MEETING AS TO WHETHER HE HAD SOLD HIS HOUSE ALREADY?

24 A JUNE?

25 Q MAY.

26 A OKAY. OKAY. JUST -- OKAY.

27 Q WHEN HE WAS ASKED TO LEAVE CAMELOT.

28 A YES.

1 Q AT THAT POINT, WERE YOU AWARE AS TO WHETHER HE
2 HAD SOLD HIS HOUSE?

3 A YES. HE TOLD US IN A LETTER THAT HE HAD
4 ALREADY SOLD THE HOUSE.

5 Q WERE YOU AWARE OF HOW MUCH HE HAD RECEIVED IN
6 SELLING THE HOUSE?

7 A IT WAS IN THE LETTER. I DON'T RECALL THE EXACT
8 AMOUNT OFF THE TOP OF MY HEAD.

9 Q WAS IT \$199,000?

10 A YES, THAT WAS THE SUM.

11 Q WERE YOU IN THE MEETING OF JUNE 6TH, 1980, THAT
12 IS THE ONE ON THE TAPE -- AT THAT TIME WERE YOU AWARE THAT
13 MR. MULL HAD SOLD HIS HOUSE?

14 A YES.

15 Q WERE YOU AWARE AT THAT TIME OF HOW MUCH MONEY
16 HE HAD RECEIVED FOR SELLING HIS HOUSE?

17 A YES.

18 Q WERE YOU AWARE AS TO WHETHER ADDITIONAL FUNDS
19 WERE GOING TO BE COMING TO HIM?

20 A YES.

21 Q YOU MENTIONED THE NUMBER OF \$10,000 AS
22 SOMETHING THAT ELIZABETH CLARE PROPHET HAD EXPECTED TO GET
23 FROM GREGORY MULL.

24 A YES.

25 Q WHERE DID THAT NUMBER COME FROM, DO YOU KNOW?

26 A IT WAS A NUMBER THAT GREGORY HAD SUGGESTED
27 HIMSELF IN THE LETTER THAT HE WROTE TO US SAYING THAT IN
28 ESSENCE THE SPIRIT OF THE THING WAS, YOU KNOW, HERE IS

1 \$10,000.

2 Q AND IF THE CHURCH ACCEPTED THAT \$10,000, DID
3 MR. MULL INDICATE WHAT WAS GOING TO HAPPEN WITH THE OTHER
4 MONIES THAT HAD BEEN LOANED TO HIM, THE TOTAL OF 37,000?

5 A HE WANTED THE REST OF IT TO BE FORGIVEN.

6 Q DURING THE COURSE OF THAT MEETING OF JUNE 6,
7 1980, DID ELIZABETH CLARE PROPHET TAKE HIM UP ON THE \$10,000
8 OFFER?

9 A YES. THAT IS WHAT SHE MEANT WHEN SHE SAID THAT
10 SHE WOULDN'T SUE HIM BECAUSE SHE WAS UNDER THE IMPRESSION
11 FROM HIS LETTERS THAT HE WAS NOT GOING --

12 MR. LEVY: I AM GOING TO OBJECT TO THIS, YOUR HONOR.
13 THE COURT: SUSTAINED.

14 Q BY MR. KLEIN: DURING THE MEETING, DID SHE TAKE
15 HIM UP ON THE \$10,000 OFFER?

16 MR. LEVY: I AM GOING TO OBJECT TO THAT, ALSO. I
17 THINK --

18 THE COURT: SUSTAINED.

19 Q BY MR. KLEIN: DURING THE MEETING, WAS THERE
20 ANY DISCUSSION ABOUT THE \$10,000? I AM TALKING ABOUT THE
21 JUNE 6, 1980, THE ONE THAT WAS TAPED.

22 A YES.

23 Q WHAT WAS THE DISCUSSION THAT RELATED
24 PARTICULARLY TO THAT OFFER AS YOU CAN RECALL?

25 A WELL, IN ESSENCE ELIZABETH SAID THAT SHE WAS
26 WILLING TO -- SHE WAS PREPARED TO SIGN A PAPER RIGHT THERE
27 IN THE ROOM AGREEING NOT TO SUE HIM WITH THE UNDERSTANDING
28 THAT HE WAS GOING TO GIVE HER -- HE WAS GOING TO GIVE THE

1 CHURCH -- REPAY AT LEAST \$10,000 ON THE MONEY THAT HE OWED
2 THE CHURCH.

3 MR. LEVY: AT THIS POINT, YOUR HONOR, I AM GOING TO
4 OBJECT AND I AM GOING TO MOVE THAT THIS RESPONSE BE STRICKEN
5 AS A MISCHARACTERIZATION OF THE TESTIMONY. THE TAPES ARE IN
6 EVIDENCE. THE TRANSCRIPT IS IN EVIDENCE. AND THIS IS THIS
7 WITNESS' OPINION. I'D ALSO OBJECT --

8 THE COURT: I UNDERSTAND YOUR OBJECTION. THE BEST
9 EVIDENCE IS ACTUALLY THE TRANSCRIPT ITSELF IS THE BEST
10 EVIDENCE OF WHAT WAS SAID. IT IS IN EVIDENCE. LET'S MOVE
11 ON.

12 MR. KLEIN: THERE HAS BEEN NUMEROUS QUESTIONS ASKED
13 ABOUT THE MEETING, YOUR HONOR.

14 THE COURT: BUT WE ARE IN THE UNUSUAL SITUATION,
15 REALLY UNUSUAL, OF HAVING IN EVIDENCE A VERBATIM TRANSCRIPT
16 SO WE DON'T HAVE TO GUESS AS TO WHAT WORDS WERE UTTERED.
17 NOW, I WILL EXPECT UPON SOME REFLECTION, YOU WILL AGREE WITH
18 THAT.

19 MR. KLEIN: I WOULD AGREE. WE JUST HAD A LOT OF
20 TESTIMONY ON IT.

21 THE COURT: THIS IS NOT LIKE THE SITUATION THAT SO
22 OFTEN OCCURS WHERE THERE IS NO RECORD OF WHAT WAS SPOKEN AND
23 PEOPLE TESTIFY FROM THEIR BEST MEMORIES.

24 MR. KLEIN: I AGREE, YOUR HONOR. I UNDERSTAND.

25 THANK YOU. I HAVE NO FURTHER QUESTIONS.

26 MR. LEVY: A FEW, YOUR HONOR.

27 ///

28 ///

REXCROSS-EXAMINATION +

1
2 BY MR. LEVY:

3 Q HAVE YOU EVER HEARD ELIZABETH CLARE PROPHET,
4 WHEN DEALING WITH SOMEONE, SAY, "FORGET THE BOARD. YOU'RE
5 DEALING WITH ME"?

6 A I THINK SHE SAID THAT TO GREGORY IN THIS
7 MEETING.

8 Q DID SHE SAY IT MORE THAN ONCE?

9 MR. KLEIN: I AM GOING TO OBJECT FOR THE SAME REASON,
10 YOUR HONOR. WE GOT THE TRANSCRIPT.

11 THE COURT: SUSTAINED.

12 Q BY MR. LEVY: DO YOU BELIEVE ELIZABETH CLARE
13 PROPHET HAS THE POWER TO FORGIVE SIN?

14 MR. KLEIN: I AM GOING TO OBJECT AT THIS POINT, YOUR
15 HONOR. IT IS IMPROPER REDIRECT.

16 THE COURT: SUSTAINED.

17 Q BY MR. LEVY: MR. KLEIN READ TO YOU SEVERAL
18 QUESTIONS AND ANSWERS AFTER WHERE I STOPPED READING TO YOU
19 BEFORE WHERE MISS PROPHET SAID, "I THOUGHT YOU WERE TALKING
20 ABOUT SPIRITUAL THINGS," AND YOU AGREED WITH MR. KLEIN'S
21 CHARACTERIZATION THAT YOU BELIEVED THAT WHAT SHE HAD
22 TESTIFIED TO AT HER DEPOSITION WAS ACCURATE.

23 WHEN SHE SAID, "WHEN DEALING WITH SPIRITUAL
24 THINGS, I HAVE THE LAST WORD. WHEN IT IS TIME TO GET ON
25 WITH THE SHOW, I HAVE THE LAST WORD," IS THAT GENERALLY HOW
26 ELIZABETH CLARE PROPHET REFERRED TO THE SPIRITUAL THINGS
27 WITH THE CHURCH, AS GETTING ON WITH THE SHOW?

28 A NO. I FEEL SHE WAS VERY REVERENTIAL WHEN

1 TALKING ABOUT THE SPIRITUAL ELEMENTS OF THE CHURCH.

2 Q YOU RECALL SPECIFICALLY AFTER THE STORY ABOUT
3 ANANIAS AND SAPPHIRA, GREGORY MULL QUERIED, "ARE YOU TELLING
4 ME IF I DON'T GIVE YOU EVERYTHING, I AM GOING TO DIE?"

5 YOU ONLY PARTIALLY RESPONDED. YOU SAID THAT
6 ELIZABETH CLARE PROPHET ONLY SAID, "NO." DIDN'T SHE ALSO
7 SAY, "I AM TELLING YOU THIS BECAUSE IT IS THE LAW AND
8 BECAUSE IT IS IN THE BIBLE"?

9 A I THINK WHAT SHE SAID WAS, "ABSOLUTELY NOT."
10 AND BEYOND THAT, I THINK SHE EXPLAINED TO HIM THAT SHE WAS
11 REPEATING A SPIRITUAL PRECEPT THAT WAS IN THE SCRIPTURES,
12 YES.

13 Q THEN LET ME REMIND YOU AT THAT MEETING WHAT SHE
14 SAID TO GREGORY MULL WAS, "I AM TELLING YOU THIS BECAUSE IT
15 IS THE LAW AND IT IS IN THE BIBLE."

16 DO YOU KNOW WHAT LAW SHE WAS REFERRING TO?

17 A I THINK SHE WAS TALKING IN GENERAL ABOUT THE
18 BODY OF SCRIPTURE AS GOD'S LAW.

19 Q YOU TESTIFIED THAT THIS LITTLE MEETING THAT YOU
20 AND ED FRANCIS AND ELIZABETH HAD WITH GREGORY MULL WAS NOT
21 SET UP IN ANY WAY?

22 A I SAID THAT WE DIDN'T DECIDE AHEAD OF TIME WHO
23 WAS GOING TO SIT WHERE. WE CERTAINLY TALKED ABOUT THE
24 MEETING AHEAD OF TIME, YES.

25 Q DID YOU HAVE A STATEMENT PREPARED TO READ INTO
26 THE RECORD DURING THAT MEETING WITH REGARD TO A DOCUMENT
27 THAT ED FRANCIS PREPARED AND YOU PREPARED WITH REGARD TO
28 YOUR POINT OF VIEW AND THE CHURCH'S POINT OF VIEW?

1 A I HAD WRITTEN SOMETHING IN -- I HAD PUT
2 SOMETHING DOWN IN WRITING WHICH WAS AMONG A PACKET OF
3 DOCUMENTS THAT WE HAD IN -- FOR THE MEETING. THERE WAS NO
4 INTENT AT THAT TIME TO READ IT IN THE MEETING.

5 Q YOU SAID YOU ASKED GREGORY MULL TO LEAVE THE
6 CHURCH IN MAY BECAUSE YOU HAD COME TO AN IMPASSE; IS THAT
7 CORRECT?

8 A OVER THE FINANCIAL THING AS WELL AS THE FACT
9 THAT WE DID NOT -- HE WAS NOT DOING ARCHITECTURAL WORK AT
10 THAT POINT IN TIME.

11 Q YOU DIDN'T NEED HIM ANYMORE?

12 A WE DIDN'T NEED HIS SERVICES AS AN ARCHITECT.

13 Q WHEN THE IMPASSE AROSE, WAS THERE ANY TIME IN
14 THE MONTHS PRIOR TO THE IMPASSE ARISING MR. MULL WAS
15 REQUESTED TO COME TO A MEETING WITH ELIZABETH AND THE BOARD
16 OF DIRECTORS TO DISCUSS THE TERMS AND CONDITIONS UNDER WHICH
17 HE CAME TO CAMELOT?

18 A DURING WHICH PERIOD OF TIME NOW? WHAT POINT --
19 WHAT PERIOD OF TIME ARE YOU REFERRING TO EXACTLY?

20 Q BEFORE YOU KICKED HIM OUT.

21 A RIGHT BEFORE HE LEFT THE CAMPUS, IS THAT WHAT
22 YOU ARE REFERRING TO?

23 Q LET'S START WITH ONE WEEK BEFORE YOU KICKED HIM
24 OUT.

25 A AS I RECALL, THE ONLY MEETING WHERE ELIZABETH
26 WAS PRESENT WAS THE JUNE 6TH MEETING. THAT IS THE ONLY
27 MEETING WHERE I REMEMBER SHE WAS PRESENT AT.

28 Q WAS A MEETING HELD WITH THE BOARD OF DIRECTORS

1 AND MR. MULL TO DISCUSS AN IMPASSE, AS YOU PHRASED IT, WITH
2 REGARD TO MONETARY PROBLEMS AND MR. GREGORY MULL PRIOR TO
3 THE TIME HE WAS ASKED TO LEAVE CAMELOT?

4 A EDWARD AND I MET WITH GREGORY.

5 Q HOW MANY TIMES?

6 A AT LEAST ONCE. I DON'T RECALL HOW MANY TIMES.

7 Q DO YOU REMEMBER WHEN IT WAS?

8 A I'M SURE IT WAS VERY -- JUST A DAY -- A FEW
9 DAYS BEFORE HE LEFT CAMPUS, WHENEVER THAT WAS. WHENEVER HE
10 LEFT THE PREMISES OR MOVED OFF CAMPUS.

11 Q WAS THAT THE MEETING WHERE YOU SAID, "GREGORY,
12 IF YOU DON'T PUT YOUR CONDOMINIUM IN TRUST FOR ELIZABETH,
13 THEN YOU ARE GOING TO HAVE TO LEAVE"?

14 A NO, I DIDN'T SAY THAT. AS I HAVE ALREADY
15 STATED, WE -- WE OPENED UP ALL KINDS OF POSSIBILITIES,
16 INCLUDING THE POSSIBILITY OF DEFERRING PAYMENT UNTIL HE
17 RECEIVED HIS \$65,000 NOTE.

18 Q WAS THERE EVER ANY MEETING WITH THE FULL BOARD,
19 WITH OR WITHOUT ELIZABETH, WHERE MR. MULL WAS GIVEN A FAIR
20 CHANCE AT ALL OF THE PROBLEMS WITH REGARD TO FINANCIAL
21 IMPASSES THAT HAD ARISEN?

22 A AT LEAST TWO OF THEM THAT I KNOW OF.

23 Q ARE YOU TELLING ME THAT THE BOARD HAD MEETINGS
24 WITH MR. GREGORY MULL, THE FULL BOARD HAD A MEETING WITH MR.
25 GREGORY MULL, WHERE THERE WAS A TOTAL AIRING OF ALL OF THE
26 CIRCUMSTANCES SURROUNDING HIS COMING TO CAMELOT AND THE
27 FINANCIAL ARRANGEMENTS PRIOR TO HIS BEING ASKED TO LEAVE THE
28 CAMPUS?

1 A NO, NO. I MISUNDERSTOOD YOUR QUESTION.

2 Q THE ANSWER IS THAT NOBODY TALKED TO GREGORY AS
3 ACTUAL REPRESENTATIVES OF THE CHURCH, THERE WAS NO FULL
4 BOARD CONVENED TO GIVE MR. MR. MULL AN OPPORTUNITY TO AIR
5 HIS GRIEVANCES, WHATEVER THEY WERE, OR TO DISCUSS ALL OF THE
6 PROBLEMS?

7 A ARE YOU ASKING ME A QUESTION?

8 Q SURE, I'M ASKING YOU A QUESTION.

9 A HE WAS GIVEN OPPORTUNITIES TO PRESENT HIS
10 THING. HE PRESENTED IT IN WRITING AND HE PRESENTED IT IN
11 PERSON --

12 Q MAYBE YOU MISUNDERSTAND MY QUESTION.

13 A -- ON TWO OCCASIONS. AND HE WAS TREATED VERY
14 SYMPATHETICALLY AND GIVEN AS BROAD A LATITUDE AS POSSIBLE
15 SHORT OF ABSOLUTE FORGIVENESS OF THE DEBTS ON AT LEAST TWO
16 OCCASIONS THAT I AM AWARE OF. AND HE REJECTED THAT
17 POSSIBILITY OUT OF HAND.

18 Q AND SYMPATHETICALLY YOU KICKED HIM OUT OF THE
19 CHURCH?

20 A WE NEVER KICKED HIM OUT OF THE CHURCH. HE
21 RESIGNED. WE SIMPLY ASKED HIM TO MOVE OFF CAMPUS AND HE HAD
22 A HOME TO GO TO A FEW MILES AWAY.

23 MR. LEVY: I HAVE NOTHING MORE FOR YOU, MR. SHEARER.

24 MR. KLEIN: NO QUESTIONS, YOUR HONOR.

25 THE COURT: YOU CAN STEP DOWN.

26 WE WILL TAKE OUR AFTERNOON RECESS AT THIS TIME.

27 (RECESS.)

28 MR. KLEIN: WE WOULD CALL STEVEN SCHWARTZ, YOUR

1 HONOR.

2

3

STEVEN SCHWARTZ, +

4

A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,

5

TESTIFIES AS FOLLOWS:

6

THE CLERK: PLEASE BE SEATED AT THE WITNESS STAND.

7

SIR, PLEASE STATE YOUR NAME FOR THE RECORD AND PLEASE SPELL

8

YOUR NAME.

9

THE COURT: MOVE UP A LITTLE CLOSER TO THE

10

MICROPHONE.

11

THE WITNESS: STEVEN SCHWARTZ. S-T-E-V-E-N,

12

S-C-H-W-A-R-T-Z.

13

THE CLERK: THANK YOU.

14

THE COURT: GO AHEAD.

15

16

DIRECT EXAMINATION +

17

BY MR. KLEIN:

18

Q MR. SCHWARTZ, ARE YOU CURRENTLY EMPLOYED?

19

A I AM A CONSULTANT TO THE TELEVISION AND FILM

20

INDUSTRY.

21

Q ARE YOU EMPLOYED OR SELF-EMPLOYED AT THIS

22

POINT?

23

A YES, I AM.

24

Q PRIOR TO BEING SELF-EMPLOYED, DID YOU HAVE AN

25

EMPLOYER?

26

A YES. I WAS CHIEF VIDEO ENGINEER FOR LUCAS FILM

27

LIMITED IN NORTHERN CALIFORNIA.

28

Q ARE YOU CURRENTLY AFFILIATED IN ANY WAY WITH

1 CHURCH UNIVERSAL AND TRIUMPHANT?

2 A NO, I AM NOT.

3 Q WAS THERE A TIME WHEN YOU WERE A CHURCH STAFF
4 MEMBER?

5 A YES.

6 Q WHAT YEARS?

7 A I WAS A CHURCH STAFF MEMBER FROM 1975 THROUGH
8 1979 AND ENDING, I BELIEVE, JANUARY OF 1979.

9 Q WHILE YOU WERE A CHURCH STAFF MEMBER, DID YOU
10 EVER LIVE AT CAMELOT?

11 A YES, I DID.

12 Q YOU SAID YOU WERE A STAFF MEMBER UNTIL 1979.
13 WHY DID YOU CEASE BEING A STAFF MEMBER IN 1979?

14 A AT THAT POINT I DESIRED TO PURSUE A CAREER AS A
15 TELEVISION ENGINEER IN A CAPACITY THAT I COULD NOT BY
16 STAYING ON THE STAFF. MAINLY DUE TO LACK OF FACILITY.

17 Q DID THERE COME A TIME THEN WHEN YOU CEASED
18 BEING A CHURCH MEMBER ALTOGETHER?

19 A YES. I CEASED TO BE A CHURCH MEMBER IN
20 FEBRUARY OF 1983, AT WHICH TIME I APPLIED MYSELF 100 PERCENT
21 TO MY CAREER AS A TELEVISION ENGINEER AND I MOVED AWAY FROM
22 THE LOS ANGELES AREA.

23 Q DID ANYBODY EVER DO OR SAY ANYTHING TO TRY TO
24 PREVENT YOU FROM LEAVING THE CHURCH STAFF?

25 A NO.

26 Q AFTER YOU LEFT THE STAFF OR AFTER YOU CEASED
27 BEING A CHURCH MEMBER, DID ANYBODY EVER THREATEN OR
28 INTIMIDATE YOU OR HARASS YOU IN ANY WAY?

1 A NO, NOT IN ANY WAY.

2 Q DID ANYBODY EVER SUGGEST TO YOU THAT YOU COULD
3 NOT MAKE YOUR ASCENSION IF YOU WOULD -- IF YOU LEFT THE
4 CHURCH?

5 A NO.

6 Q DID YOU ATTEND SUMMIT UNIVERSITY?

7 A YES, I DID.

8 Q WHEN?

9 A IT WAS JANUARY THROUGH MARCH, 1975.

10 Q WHEN YOU ATTENDED SUMMIT UNIVERSITY, DID YOU
11 KNOW GREGORY MULL?

12 A YES, I DID.

13 Q DID HE ATTEND THAT SAME QUARTER?

14 A YES.

15 Q HAD YOU KNOWN MR. MULL PRIOR TO ATTENDING
16 SUMMIT UNIVERSITY WITH HIM IN JANUARY TO MARCH OF 1975?

17 A YES. WE WERE BOTH A MEMBER OF THE SAN
18 FRANCISCO GROUP OF THE CHURCH, WHICH I BELIEVE I STARTED
19 ATTENDING THE GROUP SERVICES ON SUNDAY IN THE SUMMER OF '74.

20 Q WHEN YOU ATTENDED SUMMIT UNIVERSITY, WAS IT
21 POSSIBLE TO GET YOUR HOMEWORK DONE AND GET SUFFICIENT SLEEP?

22 A YES. ABSOLUTELY.

23 Q DID YOU HAVE ANY PROBLEM DOING THAT?

24 A NO.

25 Q WHEN YOU ATTENDED SUMMIT UNIVERSITY, WERE YOU
26 ABLE TO HAVE CONTACTS WITH PEOPLE WHO WERE NONMEMBERS OF THE
27 CHURCH?

28 A YES. I CONTACTED MY FAMILY ABOUT ONCE A WEEK

1 OR EVERY OTHER WEEK. I HAD CONTACT WITH FRIENDS.

2 Q WAS THERE A PHONE AVAILABLE FOR YOU TO HAVE
3 CONTACT WITH PEOPLE WHILE YOU WERE ATTENDED SUMMIT
4 UNIVERSITY?

5 A YES. THERE WAS A PAY PHONE AVAILABLE. IT WAS
6 IN THE CENTER OF THE CONDOMINIUM COMPLEX THAT WE STAYED AT
7 IN CARPENTARIA.

8 Q WERE THERE ANY RESTRICTIONS ON YOUR ABILITY TO
9 USE THAT PAY PHONE?

10 A NONE, WITH THE EXCEPTION THAT I REMEMBER WAKING
11 UP THE DEAN OF STUDENTS AT 11:30 ONE NIGHT TALKING TO AN OLD
12 GIRL FRIEND OF MINE. AND I WOKE HIM UP SO HE ASKED ME TO
13 MAKE THE PHONE CALL THE NEXT DAY.

14 Q OTHER THAN THAT, ANY RESTRICTIONS?

15 A NO.

16 Q HOW WOULD YOU DESCRIBE YOUR EXPERIENCE AT
17 SUMMIT UNIVERSITY FROM JANUARY TO MARCH OF 1975?

18 A VERY REWARDING. I ENJOYED IT VERY MUCH.

19 Q DID YOU HAVE ANY FREE TIME?

20 A YES. TYPICALLY ON THE WEEKENDS ALL DAY
21 SATURDAY AND SUNDAY AFTER THE SERVICE, WHICH MEANT AFTERNOON
22 AND EVENING I WAS FREE TO WALK ON THE BEACH OR GO ON ERRANDS
23 OR GO TO DENNY'S FOR A CUP OF COFFEE. THERE WERE A LOT OF
24 FACILITIES NEARBY AND I TOOK ADVANTAGE OF IT.

25 Q WHILE YOU AND MR. MULL ATTENDED SUMMIT
26 UNIVERSITY, DID YOU EVER HAVE OCCASION TO SPEAK WITH HIM?

27 A YES, I DID.

28 Q DID HE EVER COMPLAIN IN ANY WAY ABOUT SUMMIT

1 UNIVERSITY?

2 A NO, HE NEVER DID.

3 Q DID HE EVER INDICATE TO YOU THAT HE WASN'T
4 GETTING SUFFICIENT FOOD OR SUFFICIENT SLEEP?

5 A NO.

6 Q HOW OFTEN DID YOU SEE HIM WHEN YOU BOTH WERE
7 ATTENDING SUMMIT UNIVERSITY?

8 A I WOULD SAY DAILY.

9 Q DID HIS PHYSICAL APPEARANCE IN ANY WAY
10 DETERIORATE FROM THE START OF THE SUMMIT UNIVERSITY SEMESTER
11 TO THE END OF THE SEMESTER?

12 A NO.

13 Q WERE YOU EVER TAUGHT AT SUMMIT UNIVERSITY THAT
14 YOU SHOULD FEAR NONCHURCH MEMBERS?

15 A NO.

16 Q DO YOU REGRET GOING TO SUMMIT UNIVERSITY?

17 A NO, I DO NOT REGRET IT IN ANY WAY.

18 Q DURING THE YEARS THAT YOU WERE ON THE CHURCH
19 STAFF, DID YOU EVER HEAR ELIZABETH CLARE PROPHET OR ANY
20 CHURCH OFFICIAL TELL ANYONE TO THREATEN OR HARASS OR
21 INTIMIDATE ANY EX-CHURCH MEMBERS?

22 A NO, NEVER.

23 Q WHAT EFFECT, IF ANY, HAS BEING ON THE CHURCH
24 STAFF HAD ON YOUR LIFE?

25 A VERY, VERY POSITIVE ONE. WITHOUT THE
26 EXPERIENCE I HAD ON THE CHURCH STAFF, I WOULD NOT BE ABLE TO
27 PURSUE THE CAREER I HAVE PURSUED AS A TELEVISION ENGINEER,
28 WHICH I HAD BEGUN THAT CAREER BEFORE I JOINED THE CHURCH AS

1 A STAFF MEMBER.

2 AND I WAS ABLE TO WORK UNSUPERVISED ON A NUMBER
3 OF PROJECTS, BOTH MECHANICAL, MAINTENANCE TYPE PROJECTS AND
4 SOME EXPERIMENTS IN TELEVISION AND SOUND. AND WITHOUT THAT,
5 I DON'T THINK I COULD BE AT THE TOP OF MY FIELD AS I AM
6 TODAY.

7 Q WHEN YOU WERE A STAFF MEMBER, WERE THERE ANY
8 RESTRICTIONS ON YOUR COMMUNICATION WITH FAMILY OR FRIENDS
9 WHO WERE NOT STAFF MEMBERS OR NOT CHURCH MEMBERS?

10 A CAN YOU ASK IT AGAIN?

11 Q YES. WHEN YOU WERE A STAFF MEMBER, THIS IS
12 AFTER SUMMIT UNIVERSITY, WERE YOU IN ANY WAY RESTRICTED IN
13 YOUR CONTACT WITH FAMILY OR FRIENDS WHO WERE NOT STAFF
14 MEMBERS?

15 A NO, NEVER WAS.

16 Q DID YOU HAVE CONTACT WITH FAMILY AND FRIENDS
17 WHO WERE NONCHURCH MEMBERS WHILE YOU WERE A STAFF MEMBER?

18 A ABSOLUTELY. NOT ONLY PHONE CONTACT, BUT I
19 WOULD VISIT MY PARENTS ABOUT TWICE A YEAR, I SAW
20 GRANDPARENTS, BROTHER, SISTER, VISITED FRIENDS WHEN THEY
21 WERE IN TOWN, HIGH SCHOOL FRIENDS OR FRIENDS FROM COLLEGE.
22 NEVER ANY RESTRICTIONS.

23 Q WHEN YOU LEFT THE CHURCH STAFF, EVENTUALLY
24 CEASED BEING A MEMBER, DID OTHER CHURCH MEMBERS SHUN OR
25 AVOID YOU?

26 A NEVER.

27 Q AFTER YOU LEFT THE CHURCH TOTALLY, DID YOU HAVE
28 ANY CONTACT WITH CHURCH MEMBERS?

1 A YES. I HAD CONTACT IN A CASUAL WAY, LETTING
2 FRIENDS OF MINE KNOW WHAT I WAS UP TO. IN FACT ONCE I TOOK
3 A VACATION --

4 MR. LEVY: AT THIS POINT, YOUR HONOR, I AM GOING TO
5 OBJECT. THE QUESTION CALLED FOR A YES OR NO ANSWER. I
6 WOULD MOVE --

7 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

8 Q BY MR. KLEIN: WHAT WAS THE NATURE OF THE
9 CONTACT YOU HAD WITH CHURCH MEMBERS AFTER YOU LEFT THE
10 CHURCH?

11 A I TOOK A VACATION WITH ONE OF THE CHURCH
12 MEMBERS AFTERWARDS AND I HAD FREQUENT PHONE CONTACT.

13 Q EVER RECEIVE ANY INDICATION THAT CHURCH MEMBERS
14 WERE NOT SUPPOSED TO COMMUNICATE WITH YOU?

15 A NONE.

16 Q WHAT, IF ANYTHING, DID THE CHURCH TEACH AS FAR
17 AS HONESTY FOR ITS MEMBERS?

18 A HONESTY WAS VERY IMPORTANT, IT WAS SACRED, IT
19 WAS STRESSED HIGHLY.

20 Q DURING THE TIME YOU WERE ON STAFF, DID YOU EVER
21 HEAR ELIZABETH CLARE PROPHET OR ANY CHURCH OFFICIAL TELL
22 ANYONE TO DO ANYTHING THAT YOU CONSIDERED TO BE DISHONEST?

23 A NO.

24 Q WHEN YOU WERE ON STAFF, DID YOU DECREE?

25 A YES.

26 Q WHAT EFFECT, IF ANY, DID DECREES HAVE ON YOU?

27 A DECREES HAD A VERY POSITIVE EFFECT ON
28 SHARPENING MY CONCENTRATION, ON GIVING ME A REWARDING

1 FEELING, GREATER THAN THAT OF NORMAL PRAYER, BUT IN THE
2 CONTEXT OF A PRAYER.

3 Q DID YOU EVER FEEL THAT DECREES IN ANY WAY
4 LESSENE YOUR ABILITY TO THINK FOR YOURSELF OR CONTROL YOUR
5 OWN ACTIONS?

6 A NO.

7 Q WHEN YOU LIVED AT CAMELOT, DID YOU GET WHAT YOU
8 CONSIDERED TO BE SUFFICIENT SLEEP?

9 A YES, I DID.

10 Q WERE THERE EVER OCCASIONS WHERE YOU WORKED
11 LATE?

12 A YES.

13 Q WHEN YOU WORKED LATE, WHAT, IF ANYTHING, WOULD
14 HAPPEN AS FAR AS WHAT TIME YOU WOULD HAVE TO GET UP THE NEXT
15 MORNING?

16 A I WORKED LATE FREQUENTLY AND ALWAYS SLEPT UNTIL
17 I WOKE UP. I WOULDN'T EVEN USE AN ALARM CLOCK.

18 Q WHILE YOU WERE AT CAMELOT, WERE THERE EVER ANY
19 RESTRICTIONS ON YOUR ACCESS TO BOOKS, MOVIES, TV OR RADIO?

20 A NONE WHATSOEVER.

21 Q HOW WOULD YOU CHARACTERIZE YOURSELF AS FAR AS
22 STRENGTH OF CHARACTER?

23 A I AM A VERY STRONG-WILLED, ENERGETIC PERSON
24 WITH A WARM HEART AND A SENSE OF HUMOR.

25 Q WHEN YOU WERE A STAFF MEMBER, DID YOU EVER FEEL
26 HYPNOTIZED, MANIPULATED OR CONTROLLED BY CHURCH OFFICIALS IN
27 ANY WAY?

28 A NEVER FELT THAT WAY AT ALL.

1 Q YOU CERTAIN ABOUT THAT?

2 A CERTAIN.

3 Q YOU EVER FEEL WHEN YOU WERE A CHURCH STAFF
4 MEMBER THAT YOU COULDN'T LEAVE WHENEVER YOU WANTED TO LEAVE
5 THE STAFF IF THAT IS WHAT YOU WANTED TO DO?

6 A NO, NEVER FELT THAT WAY.

7 Q WHILE YOU WERE A STAFF MEMBER, DID YOU EVER
8 FAST?

9 A YES.

10 Q WHEN THEY HAD FASTS AT CAMELOT, DID YOU ALWAYS
11 TAKE PART IN THOSE FASTS?

12 A NO, NOT ALWAYS.

13 Q CURRENTLY LIVE IN NORTHERN CALIFORNIA?

14 A YES, I DO.

15 Q WHY ARE YOU TESTIFYING TODAY?

16 A I HAD A VERY GOOD EXPERIENCE WITH THE CHURCH.
17 AND TO THE EXTENT THAT MY TESTIMONY CAN HELP, I AM HERE.

18 MR. KLEIN: THANK YOU.

19 NO FURTHER QUESTIONS, YOUR HONOR.

20 THE COURT: ALL RIGHT.

21 MR. LEVY: THANK YOU, YOUR HONOR.

22

23 CROSS-EXAMINATION +

24 BY MR. LEVY:

25 Q MR. SCHWARTZ, JUST EXACTLY WHAT DO YOU DO IN
26 THE TELEVISION INDUSTRY?

27 A I AM A TECHNICAL CONSULTANT. SPECIFICALLY WHAT
28 I DO IS SPECIALIZE IN ELECTRONIC POSTPRODUCTION, WHICH IS

1 THE SECOND HALF OF THE FILM MAKING AND VIDEO PROCESS.

2 Q DOES THAT INCLUDE AUDIO AS WELL AS VIDEO?

3 A YES, IT DOES.

4 Q AND YOU TOLD US YOU WERE IN THE TOP OF THE
5 FIELD IN YOUR PARTICULAR CHOSEN PROFESSION NOW?

6 A YES.

7 Q IS THAT WHY THE JUDGE HAD TO ASK YOU TO MOVE UP
8 SO YOU COULD SPEAK IN THE MICROPHONE SO WE COULD ALL HEAR
9 YOU?

10 A I AM A LITTLE BIT SHY. I HAVE NEVER BEEN TO
11 COURT BEFORE.

12 Q I COULD TELL.

13 A SO THE ANSWER WOULD BE NO.

14 Q YOU STARTED BLUSHING UP ON THE SIDE OF YOUR
15 HEAD. YOU HAVE A BEARD AND EVERYTHING AND YOU LOOK PROBABLY
16 OLDER THAN YOU ACTUALLY ARE. I WONDER IF YOU WOULD TELL US
17 HOW OLD YOU ARE?

18 A I AM 31.

19 Q YOU ARE 31. SO AT THE TIME BACK IN 1975 WHEN
20 YOU FIRST GOT INVOLVED IN THE CHURCH, YOU WERE 20 YEARS OLD?

21 A I WAS YOUNGER THAN THAT. I BELIEVE IT WAS 18,
22 19.

23 Q EIGHTEEN OR NINETEEN?

24 A YES. I WAS IN COLLEGE AT THE TIME.

25 Q AND HOW OLD WERE YOU WHEN YOU WENT TO SUMMIT
26 UNIVERSITY?

27 A I BELIEVE IT WAS 19.

28 Q ABOUT 19?

1 A YEAH.

2 Q NOW, WHEN YOU KNEW MR. MULL AT SUMMIT
3 UNIVERSITY, WAS HE ANY OLDER THAN YOU THEN?

4 A OH, YES, HE WAS OLDER THAN ME. I BELIEVE. I
5 DIDN'T KNOW HIS EXACT AGE, BUT I PRESUME HE LOOKED OLDER
6 THAN I LOOKED.

7 Q YOU COULD ACTUALLY TELL WHEN YOU WENT THERE
8 THAT HE WAS OLDER THAN YOU?

9 A YES.

10 Q ARE YOU CONCERNED WITH YOUR ASCENSION?

11 A YES, I AM.

12 Q WHERE IS IT YOU PLAN TO ASCEND TO, SIR?

13 A TO HEAVEN.

14 Q HAVE YOU SPENT A GOOD DEAL OF YOUR LIFE IN THE
15 PURSUIT OF YOUR ASCENSION?

16 A YES, I HAVE.

17 Q AND DO YOU FIGURE YOU GOT IT LOCKED; IS THAT
18 WHY YOU LEFT THE CHURCH, BECAUSE YOU DON'T HAVE TO WORRY
19 ABOUT YOUR ASCENSION ANYMORE?

20 A NO, NOT AT ALL.

21 Q I HAVE HEARD TESTIMONY FROM ANY NUMBER OF
22 PEOPLE FROM THE CHURCH WHO SAY PRETTY MUCH THAT, "IT CAME
23 TIME TO GET ON WITH MY LIFE."

24 IS THERE ANYTHING ABOUT THE CHURCH THAT YOU
25 COULDN'T CONTINUE DOING WHILE YOU WERE GETTING ON WITH YOUR
26 LIFE?

27 A NO.

28 Q SO WHY DID YOU CEASE TO BE A MEMBER OF THE

1 CHURCH?

2 A IT WAS A MATTER OF TIME I CHOSE TO DEVOTE TO MY
3 FIELD AND THE TIME THAT I NEEDED TO SPEND IN A RELAXATION.
4 I DECIDED I WOULD RATHER SIT BACK WITH A CUP OF COFFEE, LOOK
5 OUT MY WINDOW, TAKE A DRIVE IN THE CAR AS MY WAY OF
6 UNWINDING BECAUSE I HAVE A VERY BUSY AND TIRING SCHEDULE AS
7 A TELEVISION ENGINEER. AND AS I WAS PURSUING THAT CAREER
8 FURTHER, I REALIZED IT WAS MORE AND MORE DEMANDING.

9 Q IS IT YOUR OPINION THAT IN ORDER TO DEVOTE
10 YOURSELF TO A PURSUIT OF A CAREER, YOU CANNOT HAVE A
11 RELIGIOUS AFFILIATION?

12 A NOT AT ALL.

13 Q YOU GAVE ANY NUMBER OF YEARS OF YOUR LIFE TO
14 THE CHURCH. AND THEN JUST ONE DAY YOU DECIDED YOU'D GIVEN
15 ENOUGH AND YOU REALLY DIDN'T NEED A CHURCH CONNECTION
16 ANYMORE?

17 MR. KLEIN: I AM GOING TO OBJECT. IT IS COMPOUND
18 QUESTION. IT IS ALREADY AT LEAST TWO QUESTIONS.

19 THE WITNESS: YES. COULD YOU ASK ME ONE AT A TIME,
20 PLEASE.

21 Q BY MR. LEVY: YES. I DON'T WANT TO MIX YOU UP,
22 SIR.

23 MR. KLEIN ASKED YOU ABOUT FASTING AT CAMELOT.
24 NOW, IS THE FASTING AT CAMELOT ANY DIFFERENT THAN THE
25 FASTING AT SUMMIT UNIVERSITY?

26 A NOT FOR ME, IT WASN'T.

27 Q ISN'T IT A FACT THAT AT SUMMIT UNIVERSITY, YOU
28 WERE REQUIRED TO FOLLOW THE CODE OF CONDUCT; AND WHETHER YOU

1 LIKE IT OR NOT, YOU FAST ON FAST DAYS?

2 A NO.

3 Q ISN'T IT A FACT THAT IN 1975, WHEN YOU WENT TO
4 SUMMIT UNIVERSITY, CAFETERIA WAS CLOSED ON FAST DAYS?

5 A THAT WAS TRUE.

6 Q BUT IF YOU WANTED TO SNEAK OUT AND VIOLATE THE
7 CODE OF CONDUCT, YOU COULD MAKE IT RIGHT OVER THERE TO
8 DENNY'S AND GET YOURSELF A CUP OF COFFEE?

9 A NOT SNEAK OUT, NO.

10 Q WELL, ACCORDING TO THE CODE OF CONDUCT, YOU
11 WERE AT A RETREAT, WERE YOU NOT, YOU WERE SUPPOSED TO STAY
12 THERE AND ABIDE BY THE CODE OF CONDUCT?

13 IS IT YOUR TESTIMONY THAT WHEN YOU WERE AT
14 SUMMIT UNIVERSITY, YOU FAILED TO ABIDE BY THE CODE OF
15 CONDUCT AND DIDN'T SNEAK OUT, JUST BROKE THE CODE OF
16 CONDUCT?

17 A ACCORDING --

18 MR. KLEIN: I AM GOING TO OBJECT. THERE IS AT LEAST
19 TWO OR THREE QUESTIONS IN THERE, YOUR HONOR. COMPOUND IS MY
20 OBJECTION.

21 THE COURT: IF YOU ASK ONE QUESTION AT A TIME, MR.
22 LEVY, IT WOULD BE HELPFUL.

23 MR. LEVY: I WILL SURE TRY, YOUR HONOR.

24 THE COURT: THANK YOU.

25 Q BY MR. LEVY: HAVE YOU EVER HEARD OF EXCALIBUR
26 PRODUCTIONS?

27 A EXCALIBUR PRODUCTIONS? NO.

28 Q IS THERE ANY KIND OF ORGANIZATION CONNECTED

1 WITH THE CHURCH THAT WAS KNOWN AS EXCALIBUR ANYTHING?

2 A CONNECTED WITH THE CHURCH, NO.

3 Q WAS THERE A BUSINESS ORGANIZATION THAT YOU
4 ATTEMPTED TO INITIATE CALLED EXCALIBUR ANYTHING?

5 A YES, ABSOLUTELY. EXCALIBUR VIDEO SYSTEMS WAS
6 THE NAME.

7 Q EXCALIBUR VIDEO SYSTEMS?

8 A RIGHT. INC.

9 Q HAD NOTHING TO DO WITH THE CHURCH?

10 A NOTHING WHATSOEVER.

11 Q MR. BENTON WILCOX, IS HE ALSO A CHURCH MEMBER?

12 A BENTON WAS A CHURCH MEMBER, YES.

13 Q THE TWO OF YOU TRIED TO GET A PRODUCTION
14 COMPANY STARTED?

15 A YES. WE ACTUALLY TRIED TO START A TELEVISION
16 POSTPRODUCTION FACILITIES.

17 Q TWO OF YOU GOT INTO A LITTLE SNIT, HAD A TEMPER
18 TANTRUM AND THE ENTERPRISE FELL APART?

19 A ABSOLUTELY NOT.

20 Q IT WAS A SUCCESSFUL ENTERPRISE?

21 A IT WAS A SUCCESSFUL ENTERPRISE WHEN BENTON
22 RESIGNED IN THE SUMMER OF '82 AND IT WAS STILL A SUCCESSFUL
23 OPERATION. WE WERE IN THE BLACK WHEN I LEFT IN FEBRUARY OF
24 1983 TO MOVE UP TO NORTHERN CALIFORNIA. EXCALIBUR VIDEO
25 SYSTEMS WAS VOLUNTARILY CLOSED BY THE BOARD OF DIRECTORS IN
26 APRIL, 1983.

27 Q NOW, TECHNICALLY IT MAY NOT HAVE ANYTHING TO --
28 HAVE HAD ANYTHING TO DO WITH THE CHURCH, WAS THAT A PLACE

1 WHERE A NUMBER OF CHURCH MEMBERS WERE EMPLOYED BY YOURSELF
2 AND YOUR PARTNER?

3 A YES.

4 Q AS A MATTER OF FACT, MR. MULL'S DAUGHTER WORKED
5 FOR YOU, DIDN'T SHE?

6 A YES. SHE WAS A RECEPTIONIST AND SECRETARY.

7 Q DO YOU RECALL HOW MUCH YOU WERE PAYING HER AT
8 THE TIME?

9 A NO, I DON'T. I WAS -- IF I MAY SAY, I WAS NOT
10 INVOLVED IN THE BUSINESS ASPECTS DIRECTLY. I WAS THE VICE
11 PRESIDENT OF ENGINEERING. MY RESPONSIBILITIES WERE THE
12 OPERATIONAL AND TECHNICAL ASPECTS. BENTON WAS RESPONSIBLE
13 FOR, AS PRESIDENT, FOR THE BUSINESS, AND HE WAS MORE PRIVY
14 AND AWARE OF SALARIES THAN I AM.

15 Q THE TWO OF YOU, YOURSELF AND BENTON WILCOX,
16 OWNED AND RAN AND CONTROLLED EXCALIBUR?

17 A THAT IS NOT CORRECT.

18 Q WELL, WOULD YOU CORRECT IT FOR ME?

19 A YES. EXCALIBUR VIDEO SYSTEMS HAD A VERY
20 COMPLICATED FINANCIAL STRUCTURE DUE TO THE FACT THAT THERE
21 WERE ESSENTIALLY INVESTORS WHO CHANGED THEIR MIND IN THEIR
22 INVESTMENT. AND AS A RESULT, NO ONE WAS REALLY EVER IN
23 CONTROL OF EXCALIBUR VIDEO.

24 Q JUST KIND OF RAN ITSELF, DID IT?

25 A WELL, THE DAY TO DAY OPERATIONS WERE RUN BY
26 BENTON.

27 Q YOU HAD NO IDEA WHAT ANYBODY WAS GETTING PAID
28 OR WHAT THEY WERE DOING?

1 A I KNEW WHAT SOME PEOPLE WERE GETTING PAID.

2 Q YOU WERE THE TECHNICAL EXPERT?

3 A YES. I KNEW WHAT THE EDITORS WERE GETTING
4 PAID, THE TAPE OPERATORS, THE ENGINEER, THIS SORT OF THING.

5 Q WASN'T IT A FACT THAT MOST OF THE PEOPLE
6 WORKING AT EXCALIBUR WHO WERE CHURCH MEMBERS WERE GETTING
7 PAID LITTLE OR NOTHING BY YOUR COMPANY BECAUSE THEY WERE
8 CHURCH MEMBERS?

9 A NO. WOULD YOU LIKE ME TO CORRECT THAT?

10 Q PLEASE DO.

11 A THERE WAS AN ACTUAL -- THERE WAS A VERBAL TRADE
12 ARRANGEMENT MUCH LIKE A BARTERING ARRANGEMENT WHERE CHURCH
13 UNIVERSAL AND TRIUMPHANT WAS ALLOWED TO USE THE FACILITY
14 TYPICALLY BETWEEN MIDNIGHT AND 6:00 A.M. WHEN THE FACILITY
15 WAS NOT BOOKED. AND IN EXCHANGE, SOME OF THE VERY TALENTED
16 MEMBERS OF THE AUDIO VISUAL DEPARTMENT ESSENTIALLY LENT US
17 THEIR SERVICES.

18 AND THAT WAS ONE OF THE KEYS TO THE SUCCESS IN
19 THE BUSINESS ASPECTS OF EXCALIBUR VIDEO. VERY HIGH QUALITY
20 PEOPLE FOR LESS THAN AVERAGE PAY, AND THE STAFF MEMBERS WERE
21 DOING THEIR CONTRIBUTION TO THE CHURCH AND EVERYBODY WAS
22 HAPPY.

23 Q NOW YOU HAVE GOT ME TOTALLY CONFUSED. ALL
24 THESE NICE PEOPLE WERE DOING ALL THIS GOOD STUFF FOR YOU FOR
25 NOTHING PRIMARILY FOR THE CHURCH, BUT THE CHURCH WASN'T
26 CONNECTED; IS THAT RIGHT?

27 A WAS NOT CONNECTED. THAT IS A BUSINESS
28 AGREEMENT. JUST LIKE A CUSTOMER SAYS -- ONE OF OUR

1 CUSTOMERS IN FACT TRADED CARPET FOR EDITING TIME ON A CARPET
2 COMMERCIAL. WE DID A LOT OF BARTERING AGREEMENT.

3 Q VALUE FOR VALUE?

4 A YES. EXACTLY.

5 Q THE CHURCH GOT A LOT OF BENEFIT FROM THAT, DID
6 IT NOT?

7 A YES.

8 Q AND THE PEOPLE WHO WERE DONATING ALL OF THEIR
9 TIME, DO YOU RECALL WHAT IT WAS THEY GOT?

10 A WELL, ACTUALLY I RECALL THAT AN EDITOR GOT
11 \$3,000 A MONTH, SOMETHING AROUND THAT.

12 Q ISN'T IT A FACT, SIR, THAT THERE WERE AN AWFUL
13 LOT OF PEOPLE, LOT OF YOUNG KIDS THAT WERE CONNECTED WITH
14 THE CHURCH THAT CAME OVER THERE AND WORKED FOR YOU FOR
15 NOTHING BECAUSE THE CHURCH AND ELIZABETH CLARE PROPHET TOLD
16 THEM EXACTLY TO DO THAT?

17 A NO. ABSOLUTELY NOT. IN FACT I WAS VERY MUCH
18 AGAINST A STAFF MEMBER FROM THE CHURCH COMING OVER AND
19 WORKING WITHOUT QUALIFICATIONS. AND THE SCREENING PROCESS
20 THAT I -- THAT I ADHERED TO PREVENTED, YOU KNOW, A GOOD
21 NUMBER OF PEOPLE FROM BEING QUALIFIED.

22 NOT THAT ALL THESE PEOPLE WERE SENT OVER PER SE
23 AND WE LINED THEM UP, NO. BUT I WOULD SAY THERE WAS ONE OR
24 TWO STAFF MEMBERS PER EVERY THREE MONTHS, PER QUARTER --

25 Q NOW --

26 A -- AT MOST.

27 Q THESE TECHNICAL REQUIREMENTS THAT MR. MULL'S
28 DAUGHTER NEEDED TO BE A RECEPTIONIST, DID THEY WARRANT HER

1 GETTING A SALARY?

2 A I BELIEVE LINDA GOT A SALARY, BUT I DON'T KNOW.

3 Q DIDN'T MR. MULL IN FACT GIVE THE MONEY TO YOU
4 SO YOU COULD PAY HER A SALARY SO THAT SHE COULD STAY
5 AFFILIATED WITH THE CHURCH?

6 A I WOULD SAY I DON'T HAVE ANY KNOWLEDGE OF THAT.

7 Q LET'S SEE. WHEN YOU DESCRIBED YOURSELF TO MR.
8 KLEIN, I THINK YOU SAID YOU WERE WARM AND WITTY?

9 A UH-HUH.

10 Q AND WHAT WERE SOME OF THE OTHER QUALIFICATIONS
11 YOU HAD?

12 A ENERGETIC, STRONG-WILLED.

13 Q AND VIRILE AND STRONG-WILLED. BUT YOU CAN'T
14 REMEMBER THAT MR. MULL SPOKE TO YOU PERSONALLY AND HANDED
15 YOU THE MONEY SO THAT YOU COULD PAY LINDA SO THAT HE COULD
16 TRY TO MAINTAIN HIS RELATIONSHIP AND BRING HIS DAUGHTER INTO
17 THE CHURCH?

18 A PHRASED THAT WAY, I WOULD SAY THAT IS NOT TRUE.
19 MR. MULL NEVER HANDED ME MONEY DIRECTLY NOR DID I HAVE
20 CONVERSATIONS WITH HIM CONCERNING HIS DAUGHTER.

21 Q WHO DID HE HAND THE MONEY TO THEN?

22 A IF MONEY WAS HANDED, IF THAT TOOK PLACE, WHICH
23 I HAVE NO KNOWLEDGE OF, IT WOULD PROBABLY BE MR. WILCOX.

24 Q AND OF COURSE YOU NEVER DISCUSSED THAT WITH MR.
25 WILCOX?

26 A NEVER.

27 Q AND OF COURSE YOU NEVER HAD A FALLING OUT WITH
28 MR. WILCOX?

1 A WE DID NOT HAVE A FALLING OUT. WE PARTED AS
2 FRIENDS, IN FACT CONTINUED TO CONVERSE AS FRIENDS AFTER HE
3 AND I LEFT EXCALIBUR.

4 Q IT IS A VERY PROFITABLE, WELL-MANAGED, WELL-RUN
5 COMPANY, HE JUST WALKED AWAY FROM IT AFTER YOU HAD THIS
6 DISCUSSION AND CAME TO A PARTING BECAUSE I ASSUME IT WAS
7 TIME TO GET ON WITH OTHER THINGS IN HIS LIFE?

8 MR. KLEIN: YOUR HONOR, AT THIS POINT I WOULD OBJECT
9 AS TO THE RELEVANCE.

10 THE COURT: HE CAN ANSWER.

11 THE WITNESS: NO, WE DID NOT HAVE A FALLING OUT. IT--
12 WAS YOUR ORIGINAL QUESTION. WE DID HAVE A CONFLICT
13 CONCERNING HIS PRESIDENCY. I REQUESTED HE RESIGN. WE DID
14 ARGUE ABOUT IT. BUT IN FACT HE DID FINALLY RESIGN.

15 Q BY MR. LEVY: AND THEN HE GOT ON WITH OTHER
16 THINGS IN HIS LIFE JUST LIKE YOU DID WHEN YOU HAD ENOUGH
17 WITH THE CHURCH, YOU GOT ON WITH OTHER THINGS IN YOUR LIFE?

18 A I HAVE NO KNOWLEDGE OF EXACTLY WHAT BENTON HAS
19 BEEN INTO.

20 MR. LEVY: THANK YOU, SIR.

21 I HAVE NOTHING FURTHER.

22 MR. KLEIN: JUST ONE QUESTION.

23

24 REDIRECT EXAMINATION +

25 BY MR. KLEIN:

26 Q MR. LEVY JUST SAID THAT YOU LEFT WHEN YOU HAD
27 ENOUGH OF THE CHURCH. IS THAT A CORRECT CHARACTERIZATION OF
28 WHY YOU LEFT?

1 A OH, NO. NOT AT ALL.

2 MR. KLEIN: THANK YOU.

3 I HAVE NO FURTHER QUESTIONS.

4 MR. LEVY: NOTHING FURTHER.

5 THE COURT: YOU ARE EXCUSED.

6 THE WITNESS: THANK YOU.

7 THE COURT: CALL YOUR NEXT WITNESS.

8 MR. KLEIN: GRACE MC GUIRE, YOUR HONOR.

9

10 GRACE MC GUIRE, +
11 A PLAINTIFF'S WITNESS, HAVING BEEN FIRST DULY SWORN,
12 TESTIFIES AS FOLLOWS:

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

16 THE WITNESS: MY NAME IS GRACE MC GUIRE. FIRST NAME
17 IS GRACE, G-R-A-C-E. LAST NAME MC GUIRE, M-C CAPITAL
18 G-U-I-R-E.

19 THE CLERK: THANK YOU.

20

21 DIRECT EXAMINATION +

22 BY MR. KLEIN:

23 Q PLEASE BE SURE TO SPEAK INTO THAT MICROPHONE SO
24 EVERYBODY CAN HEAR YOU.

25 ARE YOU CURRENTLY A CHURCH MEMBER?

26 A YES, I AM.

27 Q WHERE DO YOU LIVE?

28 A I LIVE IN REDWOOD CITY, CALIFORNIA.

1 Q ARE YOU CURRENTLY EMPLOYED?

2 A YES, I AM.

3 Q WHAT DO YOU DO?

4 A I AM AN INTERIOR DECORATOR.

5 Q ARE YOU CURRENTLY A CHURCH STAFF MEMBER?

6 A NO, I AM NOT.

7 Q WAS THERE A TIME WHEN YOU WERE A CHURCH STAFF
8 MEMBER?

9 A YES, I WAS.

10 Q WHEN WAS THAT?

11 A IN SEPTEMBER OF 1976 THROUGH DECEMBER OF 1984.

12 Q AND WHY DID YOU --

13 A EXCUSE ME. 1983, I BELIEVE. IT WAS SEVEN
14 YEARS.

15 Q YEARS THAT YOU WERE A STAFF MEMBER WERE WHAT
16 YEARS?

17 A THAT'S CORRECT. 1976 THROUGH 1983.

18 Q JUST CALM DOWN. I KNOW IT IS AN UNUSUAL
19 EXPERIENCE. HAVE YOU EVER TESTIFIED BEFORE?

20 A NO, I HAVE NOT.

21 Q WHY DID YOU CEASE BEING A CHURCH STAFF MEMBER
22 IN 1983?

23 A BECAUSE I DECIDED TO RETURN TO SAN FRANCISCO TO
24 BE WITH MY CHILDREN.

25 Q HAD YOUR CHILDREN LIVED AT CAMELOT?

26 A YES, THEY HAD.

27 Q COULD THEY HAVE LIVED AT CAMELOT WHEN YOU WERE
28 LIVING THERE?

1 A YES.

2 Q WAS THERE A REASON WHY THEY DIDN'T LIVE AT
3 CAMELOT?

4 A YES. THEY DECIDED TO RETURN TO SAN FRANCISCO
5 TO LIVE WITH THEIR FATHER. THEY MISSED HIM.

6 Q DID ANYONE FROM THE CHURCH DO OR SAY ANYTHING
7 TO PREVENT YOU FROM LEAVING THE STAFF AND GOING BACK TO SAN
8 FRANCISCO?

9 A NO ONE DID.

10 Q DID ANYBODY HARASS OR THREATEN OR INTIMIDATE
11 YOU WHEN YOU DECIDED YOU WANTED TO GO BACK TO SAN FRANCISCO?

12 A NOT AT ALL.

13 Q DID THE CHURCH MEMBERS SHUN OR AVOID YOU WHEN
14 YOU DECIDED TO GO BACK TO SAN FRANCISCO?

15 A NO, THEY DIDN'T.

16 Q DO YOU KNOW GREGORY MULL?

17 A YES, I DO.

18 Q DO YOU KNOW KATHLEEN HAMMOND OR KATHLEEN MULL?

19 A YES, I DO.

20 Q WHEN DID YOU FIRST MEET HER?

21 A IN 1975 AFTER A CONFERENCE.

22 Q DID THERE COME A TIME WHEN YOU AND KATHLEEN
23 MULL BECAME FRIENDLY?

24 A YES.

25 Q WHEN WAS THAT?

26 A IN 1976 WHEN I JOINED THE STAFF.

27 Q AND DURING THE TIME THAT YOU WERE FRIENDLY WITH
28 HER, HOW MANY TIMES A WEEK WOULD YOU TYPICALLY SEE HER?

1 A SOMETIMES TWO TIMES A WEEK, SOMETIMES THREE,
2 FOUR, FIVE, DEPENDING ON WHERE SHE WORKED OR WHERE I WORKED
3 OR WHEN OUR -- YEAH.

4 Q WERE YOU BOTH STAFF MEMBERS AT THE SAME TIME?

5 A YES, WE WERE.

6 Q DID YOU HAVE ANYTHING ELSE IN COMMON IN
7 ADDITION TO BEING STAFF MEMBERS?

8 A YES, WE DID. OUR CHILDREN.

9 Q WHAT DO YOU MEAN BY THAT?

10 A WE HAVE CHILDREN APPROXIMATELY THE SAME AGES,
11 DAUGHTERS.

12 Q WERE THEY FRIENDS?

13 A YES, THEY WERE.

14 Q DID THERE COME A TIME IN 1978 WHEN YOU AND
15 KATHLEEN MULL HAD A CONVERSATION ABOUT GREGORY MULL'S SEXUAL
16 PREFERENCES?

17 A YES.

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

19 ANYTHING THAT THIS WITNESS SAYS IS HEARSAY.

20 THE COURT: WELL, THAT WILL BE SUSTAINED.

21 MR. KLEIN: YOUR HONOR, I WOULD -- MAY I BE HEARD?

22 THE COURT: ALL RIGHT.

23 (THE FOLLOWING PROCEEDINGS WERE HELD

24 AT THE BENCH:)

25 MR. KLEIN: THERE IS TWO POINTS, YOUR HONOR. - FIRST
26 IS THE STATEMENT IS NOT BEING PUT IN FOR THE TRUTH OF THE
27 STATEMENT. WE HAVE ALREADY ESTABLISHED THAT MR. MULL HAD
28 BEEN HOMOSEXUAL. IT IS PUT IN FOR THE FACT THAT SHE SAID

1 IT.

2 SECONDLY, IT IS PUT IN AS A PRIOR INCONSISTENT
3 STATEMENT BECAUSE I ASKED KATHLEEN MULL IF SHE HAD EVER SAID
4 IT TO ANYBODY, AND SHE GAVE ONE NAME AND SAID NO ONE ELSE.
5 AND THAT IS WHY PURSUANT TO THE EVIDENCE CODE, I ASKED THAT
6 SHE NOT BE EXCUSED SO I CAN ASK OF THIS WITNESS IF SHE HAD
7 SUCH A CONVERSATION WITH KATHLEEN MULL WHERE SHE TOLD HER
8 THAT GREGORY MULL HAD BEEN A HOMOSEXUAL.

9 IT HAS BEEN A KEY ISSUE IN THIS TRIAL. MR.
10 MULL TESTIFIED THAT --

11 THE COURT: KEEP YOUR VOICE DOWN.

12 MR. KLEIN: MR. MULL TESTIFIED THAT ELIZABETH CLARE
13 PROPHET WAS THE ONLY ONE WHO KNEW THIS. AND THAT WHEN IT
14 GOT AROUND, IT MUST HAVE BEEN HER. AND TO THE EXTENT THAT
15 KATHLEEN MULL TOLD OTHER PEOPLE ABOUT IT IS CERTAINLY VERY,
16 VERY RELEVANT TO WHAT WE ARE DOING HERE.

17 THE COURT: DO YOU WANT TO BE HEARD?

18 MR. LEVY: YES, YOUR HONOR. NUMBER ONE, KATHLEEN
19 MULL, MUELLER OR HAMMOND IS NOT ON TRIAL HERE. SHE
20 TESTIFIED THAT SHE TALKED TO ONE PERSON AND THAT ONE PERSON
21 WAS A MINISTER AT THE CHURCH.

22 MR. MULL -- THERE HAS BEEN NO PROOF AT THIS
23 POINT THAT MR. MULL IS A HOMOSEXUAL. THERE HAS BEEN
24 TESTIMONY THAT DURING HIS EARLY YEARS, HE EXPERIMENTED WITH
25 HOMOSEXUALITY. WE HAVE HAD NO MEDICAL TESTIMONY OR
26 PSYCHOLOGICAL TESTIMONY OR ANY OTHER KIND OF TESTIMONY THAT
27 CONCLUSIVELY WOULD MAKE AN ADJUDICATION AS TO WHAT HIS
28 SEXUAL PREFERENCE IS.

1 NOW, ANY TESTIMONY BY THIS WITNESS WITH REGARD
2 TO CONVERSATIONS THAT PURPORTEDLY TOOK PLACE WOULD STILL BE
3 HEARSAY. AND I BELIEVE THAT THEY WOULD --

4 THE COURT: WELL --

5 MR. KLEIN: JUST TO MAKE CLEAR, YOUR HONOR, I AM NOT
6 PUTTING IT IN TO PROVE THAT HE IS A HOMOSEXUAL. MERELY THAT
7 SHE SAID IT.

8 THE COURT: WHAT IS THE RELEVANCE? THAT IS MY REAL
9 QUESTION RIGHT NOW.

10 MR. KLEIN: THE RELEVANCE IS THAT THEY HAVE SAID THAT
11 MR. MULL TOLD THIS TO ELIZABETH CLARE PROPHET. IT WAS
12 CONFIDENTIAL INFORMATION. AND MY POINT IS HE TOLD A NUMBER
13 OF PEOPLE AND KATHLEEN MULL TOLD A NUMBER OF PEOPLE THAT HE
14 WAS HOMOSEXUAL. AND IT WAS KNOWN TO THE WHOLE COMMUNITY
15 THROUGH THEIR OWN STATEMENTS, NOT THROUGH ANYTHING --

16 THE COURT: APPARENTLY SHE IS ABOUT TO SAY IT WAS
17 KATHLEEN WHO SPOKE TO HER AND NOT GREGORY.

18 EXCUSE MY REFERENCE TO FIRST NAMES, BUT IT IS
19 THE ONLY WAY TO DISTINGUISH IT.

20 MR. KLEIN: THAT KATHLEEN HAMMOND MULL TOLD HER THAT
21 GREGORY HAD BEEN A HOMOSEXUAL.

22 THE COURT: SHE CAN ANSWER.

23 (THE PROCEEDINGS WERE RESUMED IN OPEN
24 COURT IN THE PRESENCE OF THE JURY:)

25 Q BY MR. KLEIN: DID THERE COME A TIME IN 1978
26 WHEN YOU AND KATHLEEN MULL HAD A CONVERSATION ABOUT GREGORY
27 MULL'S SEXUAL PREFERENCES?

28 A YES, WE DID.

1 Q WHAT -- DO YOU KNOW WHERE IT OCCURRED?

2 A I BELIEVE IT WAS IN MY CAR.

3 Q AND CAN YOU TELL US WHAT SHE SAID ABOUT GREGORY
4 MULL'S SEXUAL PREFERENCES?

5 A AS I RECALL --

6 THE COURT: BEFORE YOU ANSWER, I AM GOING TO INSTRUCT
7 THE JURY THAT YOU MAY CONSIDER THIS TESTIMONY NOT AS
8 EVIDENCE OF THE TRUTH OF THE STATEMENT ITSELF, BUT YOU MAY
9 CONSIDER THIS ONLY AS EVIDENCE OF THE STATEMENT HAVING BEEN
10 MADE.

11 NOW YOU MAY ANSWER.

12 THE WITNESS: THANK YOU.

13 AS I RECALL, WE WERE RIDING IN THE CAR. SHE
14 WAS UPSET WITH GREGORY. SHE WAS PUTTING HIM DOWN. SHE
15 COMPLAINED ABOUT HIS CHEAPSKATENESS, HOW TIGHT HE WAS WITH
16 THEIR MONEY, DIDN'T GIVE HER MONEY WHEN SHE NEEDED IT.

17 AND SHE WAS CONCERNED ABOUT THEIR MARRIAGE. IT
18 WASN'T WORKING OUT. SHE TOLD ME THAT HE HAD BEEN A
19 HOMOSEXUAL PRIOR TO THEIR MARRIAGE, PRIOR TO THEIR ENTERING
20 INTO THE TEACHINGS.

21 Q BY MR. KLEIN: WAS IT UNUSUAL FOR HER TO
22 COMPLAIN ABOUT GREGORY MULL TO YOU?

23 A NO. I HAD HEARD MANY COMPLAINTS.

24 Q I'D LIKE TO DRAW YOUR ATTENTION TO APRIL OF
25 1981, THE DAY OF THE SQUARE DANCE. DO YOU RECALL THAT
26 SQUARE DANCE?

27 A YES, I DO.

28 Q WERE YOU A CHURCH STAFF MEMBER AT THE TIME?

1 A I WAS.

2 Q WERE YOU IN THE VICINITY OF THE GUARDHOUSE
3 ON -- AT SOME POINT DURING THAT DATE?

4 A YES, I WAS.

5 Q WHY WERE YOU THERE?

6 A I WAS THERE AS A GREETER TO WELCOME PEOPLE WHO
7 CAME ONTO THE CAMPUS THAT DAY TO ATTEND THE SQUARE DANCE.

8 Q DID THERE COME A TIME WHEN GREGORY MULL CAME
9 ONTO THE CAMELOT PROPERTY?

10 A YES, HE DID.

11 Q DID THERE COME A TIME WHEN HE WAS IN THE
12 VICINITY OF THE GUARDHOUSE?

13 A YES.

14 Q WAS HE ALONE?

15 A NO, HE WAS NOT.

16 Q DO YOU KNOW WHO WAS WITH HIM?

17 A YES. HIS DAUGHTER LINDA, HER BOYFRIEND,
18 NEWSPAPER REPORTER FROM THE LAS VIRGENES TIMES I BELIEVE AND
19 A PHOTOGRAPHER.

20 Q WHEN GREGORY MULL CAME INTO THE VICINITY OF THE
21 GUARDHOUSE, WERE YOU THERE AT THAT TIME?

22 A YES, I WAS.

23 Q DO YOU RECALL WHO WAS THERE IN THE VICINITY OF
24 THE GUARDHOUSE WHEN MR. MULL ARRIVED AT THAT POINT? WHO WAS
25 THERE WHO WAS AFFILIATED WITH THE CHURCH?

26 A PAULA ZARZYCKI, SUSAN MC ADAMS, DOUGLAS KENYON,
27 EUGENE GARCIA AND MYSELF.

28 Q DID THERE COME A TIME WHEN EDWARD FRANCIS

1 ARRIVED?

2 A YES. HE ARRIVED SHORTLY THEREAFTER.

3 Q ONCE MR. MULL AND MR. FRANCIS WERE BOTH IN THE
4 VICINITY OF THE GUARDHOUSE, DID THEY HAVE A CONVERSATION?

5 A YES, THEY DID.

6 Q DID YOU HEAR WHAT THEY SAID?

7 A YES, I DID, PART OF IT.

8 Q AS BEST AS YOU CAN RECALL, WHAT WAS SAID?

9 A GREG WAS INSISTENT UPON COMING ONTO THE CAMPUS.
10 HE RAISED HIS VOICE, HE TALKED VERY FAST AND HE WAS VERY
11 LOUD. HE WAS -- HE DEMANDED TO BE ALLOWED ONTO THE CAMPUS.
12 HE BROUGHT HIS GUESTS WITH HIM.

13 HE ALSO -- I AM SORRY, I DID NOT TELL YOU THAT
14 MR. AND MRS. MALEK WERE ALSO PRESENT AT THAT TIME HE BROUGHT
15 HIS GUESTS, HIS DAUGHTER, HER BOYFRIEND AND SO ON. AND HE
16 WANTED THEM ALL TO COME UP AND ENJOY THE SQUARE DANCE.

17 Q WHAT, IF ANYTHING, DID MR. FRANCIS SAY?

18 A HE TOLD HIM THAT HE WAS NOT WELCOME.

19 Q DID THERE COME A TIME WHEN GREGORY MULL SAID
20 SOMETHING TO YOU?

21 A YES.

22 Q WHAT DID HE SAY?

23 A HE DIDN'T SEE ME AT FIRST. AND WHEN HE
24 OBSERVED MY PRESENCE, HE WALKED OVER AND HE SAID, "OH,
25 HELLO," TO ME IN SOME WAY. HE TOLD ME THAT HE FELT VERY
26 SORRY FOR ME, THAT I MADE SUCH A LARGE MISTAKE IN MY LIFE.

27 FELT VERY SORRY FOR MY CHILDREN, THAT I HAD
28 MADE A LARGE MISTAKE IN SELLING MY HOME AND GIVING MY -- MY

1 MONEY TO THE CHURCH, FOR GIVING MY CHILDREN UP FOR THE
2 CHURCH, FOR REMAINING ON STAFF WHILE MY CHILDREN WENT BACK,
3 THAT I WAS A FOOL AND I WAS -- THAT I WAS A TERRIBLE PARENT.

4 Q DID HE SAY THIS WITH OTHER PEOPLE PRESENT?

5 A YES.

6 Q TO YOUR KNOWLEDGE, DID THE OTHER PEOPLE HEAR
7 IT?

8 A I AM SURE THAT THEY DID. HE WAS VERY LOUD.

9 Q NOW, AT THAT TIME WHEN THIS OCCURRED, WERE YOU
10 DIVORCED AT THAT TIME?

11 A YES, I WAS.

12 Q WHEN WERE YOU DIVORCED?

13 A I WAS DIVORCED IN 1973.

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

16 A 1975.

17 Q HAD YOU EVER HEARD OF THE CHURCH AT THE TIME OF
18 YOUR DIVORCE?

19 A NO.

20 Q DID THE CHURCH HAVE ANYTHING TO DO WITH THE
21 BREAKUP OF YOUR MARRIAGE?

22 A NO, NOT AS HE SAID. NOT AT ALL.

23 Q AND DID YOU AT SOME POINT SELL YOUR HOUSE?

24 A YES, I DID.

25 Q AND DID YOU DONATE THE MONEY TO THE CHURCH?

26 A I DID.

27 Q DID ANYBODY ASK YOU TO DO THAT?

28 A NOT AT ALL.

1 Q DO YOU REGRET DOING THAT?

2 A NO.

3 Q AS FAR AS YOUR CHILDREN -- WITHDRAWN.

4 AS FAR AS YOUR CHILDREN, WERE YOU RESTRICTED IN
5 ANY WAY WITH HAVING CONTACT WITH THEM?

6 A NO, I WAS NOT.

7 Q DID YOU IN FACT HAVE CONTACT WITH THEM WHEN YOU
8 WANTED TO?

9 A YES, I DID.

10 Q DO YOU RECALL WHY YOU GAVE THE MONEY FROM THE
11 SALE OF YOUR HOUSE TO THE CHURCH?

12 MR. LEVY: I WOULD OBJECT, YOUR HONOR. RELEVANCE.
13 NO, I WITHDRAW THE OBJECTION. I AM CURIOUS.

14 THE COURT: SHE CAN ANSWER.

15 THE WITNESS: I WANTED TO SUPPORT THE CHURCH. WE
16 WERE AT THE TIME IN PASADENA AND ATTEMPTING TO PURCHASE WHAT
17 IS NOW CAMELOT. I BELIEVED IN THE COMMUNITY AND THE
18 ASCENDED MASTERS AND I WANTED TO BE WITH THE COMMUNITY. I
19 THOUGHT IT WOULD BE A WONDERFUL PLACE FOR MYSELF AND THE
20 CHILDREN. I BELIEVED IN THE FUTURE OF THE CHURCH.

21 Q BY MR. KLEIN: SINCE THEN YOU HAVE LEFT THE
22 STAFF AND MOVED BACK TO SAN FRANCISCO; AM I CORRECT?

23 A THAT'S CORRECT.

24 Q AND DOES THE FACT THAT YOU HAVE DONE THAT IN
25 ANY WAY CHANGE THE WAY YOU FELT ABOUT GIVING THE MONEY?

26 A NO.

27 Q AFTER MR. MULL SPOKE TO YOU, DID HE SPEAK WITH
28 MR. FRANCIS?

1 A YES, HE DID. FOR SOMETIME.

2 Q AND WAS THE CONVERSATION ANY DIFFERENT?

3 A IT WAS PRETTY MUCH IN THE SAME VEIN.

4 Q DURING THE TIME THAT MR. FRANCIS AND MR. MULL
5 WERE TALKING, WERE YOU THERE THE ENTIRE TIME?

6 A YES, I WAS.

7 Q DID A GROUP OF MEN AT ANY POINT EMERGE FROM
8 WHERE THE TREES WERE AND WALK ONTO THE ROAD AND BLOCK THE
9 ROAD?

10 A NO. WHAT IS FUNNY IS THERE ARE EUCALYPTUS
11 TREES, AND THEY ARE SKINNY TREES AND IT WOULD BE RATHER
12 DIFFICULT TO HIDE BEHIND ONE OF THESE EUCALYPTUS TREES.

13 ANOTHER THING, TOO, THERE WERE MANY PEOPLE
14 COMING ONTO THE CAMPUS WHO WERE INVITED TO THE SQUARE DANCE
15 WHO WERE DRIVING UP AND DOWN THE ROAD. IT WOULD HAVE BEEN
16 VERY PECULIAR TO SEE A GROUP OF MEN STANDING THERE AND -- IN
17 JUDO ROBES OR WHATEVER, KARATE ROBES. NO, THERE WAS NO ONE.

18 Q DURING THE CONVERSATION MR. FRANCIS HAD WITH
19 MR. MULL, AT ANY TIME WHILE MR. MULL WAS ON THE PROPERTY DID
20 ANYBODY MAKE ANY KIND OF THREATENING GESTURE TOWARDS HIM?

21 A NO.

22 Q AT ANY TIME DID ANYBODY MAKE ANY KIND OF
23 GESTURE TOWARDS MR. MULL?

24 A NOT AT ALL.

25 Q HOW MANY YEARS DID YOU LIVE AT CAMELOT?

26 A APPROXIMATELY FROM 1980 THROUGH 1983 OR 1979 --
27 I AM SORRY. 1978 THROUGH 1983.

28 Q WHAT EFFECT, IF ANY, DID LIVING AT CAMELOT HAVE

1 ON YOUR WIFE?

2 A I HAD A WONDERFUL SENSE OF COMMUNITY, OF FAMILY
3 GREATER THAN MY OWN, WHICH OF COURSE ENCOMPASSED MY OWN
4 FAMILY. I LOVED MY SERVICE ON THE STAFF. IT WAS A VERY
5 RICH EXPERIENCE. THE COMMUNICATION WITH THE ASCENDED
6 MASTERS, THE DISCIPLES OF CHELA WAS WONDERFUL. IT WAS A
7 WONDERFUL EXPERIENCE.

8 Q DID YOU DECREE?

9 A YES, I DID.

10 Q WHAT EFFECT DID DECREEING HAVE ON YOU?

11 A IT WAS WONDERFUL. IT WAS A GREAT COMMUNICATION
12 WITH GOD. DID AND DOES.

13 Q I AM SORRY?

14 A DID AND DOES. I STILL DECREE.

15 Q WHAT DID THE CHURCH TEACH YOU ABOUT HONESTY?

16 A IT TEACHES HONESTY.

17 Q DURING ALL THE TIME THAT YOU WERE AFFILIATED
18 WITH THE CHURCH, DID YOU EVER HEAR ELIZABETH CLARE PROPHET
19 OR ANY CHURCH OFFICIAL TELL ANYONE TO DO ANYTHING THAT YOU
20 CONSIDERED TO BE DISHONEST?

21 A NO.

22 Q DID YOU GO TO SUMMIT UNIVERSITY?

23 A YES, I DID.

24 Q DO YOU RECALL WHAT YEAR?

25 A 1976.

26 Q HOW WOULD YOU CHARACTERIZE THAT EXPERIENCE?

27 A IT WAS A WONDERFUL EXPERIENCE. I LEARNED A
28 LOT. I LEARNED ABOUT THE ASCENDED MASTERS. IT WAS MY

1 CONTACT WITH THE ASCENDED MASTERS, MY INITIAL CONTACT WITH
2 THE ASCENDED MASTERS AND THE BEGINNING OF MY DISCIPLESHIP.

3 Q WHEN YOU LIVED AT CAMELOT AND YOU WERE A STAFF
4 MEMBER, DID YOU EVER FEEL THAT YOU WERE IN ANY WAY
5 HYPNOTIZED OR MANIPULATED OR CONTROLLED BY THE CHURCH?

6 A NO.

7 Q ANY DOUBT ABOUT THAT?

8 A NO.

9 Q WAS THERE ANY DOUBT IN YOUR MIND YOU COULD
10 LEAVE THE CHURCH ANY TIME YOU WANTED?

11 A NO. I LEFT WHEN I CHOSE TO.

12 Q WHEN YOU WERE A CHURCH STAFF MEMBER, WERE THERE
13 ANY RESTRICTIONS DURING YOUR FREE TIME ON BOOKS, TV OR
14 RADIO?

15 A NO.

16 Q YOU LIVE IN SAN FRANCISCO NOW?

17 A YES. NEARBY, REDWOOD CITY.

18 Q WHY DID YOU COME DOWN HERE TO TESTIFY?

19 A TO TELL THE TRUTH ABOUT THE INCIDENT.

20 MR. KLEIN: THANK YOU.

21 THE WITNESS: INCIDENTS.

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

23

24 CROSS-EXAMINATION +

25 BY MR. LEVY:

26 Q MISS MC GUIRE, HAD A WONDERFUL TIME AT THE
27 CHURCH?

28 A YES.

1 Q HAVE A WONDERFUL TIME AT SUMMIT UNIVERSITY?

2 A RIGHT.

3 Q HAVE A WONDERFUL TIME AT THE CONFERENCES?

4 A I DID.

5 Q HAVE A WONDERFUL TIME WHEN YOUR DAUGHTER
6 KEIRSTEN DECIDED SHE DIDN'T WANT TO LIVE IN THE CHURCH AND
7 SHE WANTED TO GO BACK AND LIVE WITH HER FATHER?

8 A IT WAS HER CHOICE.

9 Q WAS IT WONDERFUL FOR YOU WHEN SHE DECIDED --

10 A I RESPECTED HER CHOICE, HER FREE WILL.

11 Q THAT IS VERY NICE OF YOU.

12 WAS IT ALSO WONDERFUL FOR YOU WHEN SHE CHOSE
13 NOT TO LIVE WITH YOU AND BE INVOLVED IN THE CHURCH AND GO
14 BACK AND LIVE WITH HER FATHER?

15 A I DON'T KNOW IF I CAN ANSWER THAT QUESTION. I
16 DON'T QUITE UNDERSTAND IT. WHAT DO YOU MEAN "WONDERFUL"?

17 Q YOU TOLD US HOW WONDERFUL SUMMIT UNIVERSITY WAS
18 AND HOW WONDERFUL THE CHURCH WAS. I JUST WONDERED IF THAT
19 WAS WONDERFUL, TOO.

20 MR. KLEIN: I AM GOING TO OBJECT. IT IS
21 ARGUMENTATIVE, YOUR HONOR.

22 THE COURT: IT IS TIME FOR ANOTHER QUESTION.

23 Q BY MR. LEVY: YOU SAID YOU WERE A CHELA. WOULD
24 YOU TELL US WHAT A CHELA IS?

25 A CHELA IS A PERSON WHO HAS A COMMUNION WITH GOD
26 WHO LIVES IN ATTUNEMENT WITH THE WILL OF GOD WHO ATTEMPTS TO
27 BE IN ALIGNMENT WITH THE WILL OF GOD.

28 Q HAVE YOU EVER LOOKED UP THE WORD "CHELA" IN THE

1 WEBSTER DICTIONARY?

2 A CHELA MEANS SLAVE.

3 Q IT ALSO MEANS THE PAW OF A SCORPION. ARE YOU
4 AWARE OF THAT?

5 A NO, I AM SORRY.

6 Q YOU OUGHT TO TRY WEBSTER'S ONE TIME.
7 YOU WERE DESCRIBING FOR US THE SQUARE DANCE?

8 A CORRECT.

9 Q NOW, MR. MULL CAME TO THE SQUARE DANCE; IS THAT
10 RIGHT?

11 A YES, HE DID.

12 Q AND YOU LISTED A NUMBER OF PEOPLE WHO WERE
13 PRESENT WHEN MR. MULL AND MR. FRANCIS HAD A CONVERSATION.
14 WHERE WERE THEY STANDING WHEN THEY HAD THE CONVERSATION?

15 A IN THE CENTER OF THE ROAD IN FRONT OF THE
16 GUARDHOUSE INITIALLY. AND THEN AFTER A SHORT TIME, WE ASKED
17 THEM TO MOVE OVER TO THE SIDE OF THE ROAD BECAUSE THEY WERE
18 OBSTRUCTING THE TRAFFIC, FLOW OF TRAFFIC GOING IN AND OUT OF
19 THE DRIVEWAY.

20 Q WAS THERE A PRETTY HEAVY FLOW OF TRAFFIC?

21 A SIZEABLE AMOUNT.

22 Q DID YOU HAVE TO CONCERN YOURSELF WITH THE
23 TRAFFIC, OR WERE YOU ABLE TO DODGE THE CARS OR HOW DID YOU
24 HANDLE THE SITUATION?

25 A I ASKED THEM TO MOVE OVER SO WE COULD HAVE THE
26 CARS PASS BY.

27 Q HOW LONG DID THE CONVERSATION BETWEEN MR. MULL
28 AND MR. FRANCIS LAST?

1 A I WOULD SAY ABOUT 45 MINUTES.

2 Q DO YOU HAVE A GUESSTIMATE AS TO HOW MANY CARS
3 AND HOW MANY PEOPLE PASSED BY DURING THOSE 45 MINUTES?

4 A IT WAS KIND OF A LONG TIME AGO. NO, I DON'T.

5 Q YOU REMEMBER ALL THE PEOPLE THAT WERE THERE AND
6 EXACTLY WHAT THEY DID AND WHAT THEY SAID, BUT YOU HAVE NO
7 IDEA --

8 A I DON'T REMEMBER EVERYTHING WHAT THEY SAID OR
9 WHAT THEY DID. I AM SORRY, I DON'T.

10 Q WERE THERE MORE THAN HALF A DOZEN CARS THAT
11 CAME THROUGH IN THAT 45 MINUTES?

12 A I AM SURE. IT WAS A SPECIAL EVENT. WE HAD
13 POSTERS UP AROUND THE AREA. WE INVITED FRIENDS, PEOPLE IN
14 THE COMMUNITY TO COME TO THE SQUARE DANCE. SO WE HAD MANY
15 PEOPLE DRIVE IN.

16 Q ALL I AM TRYING TO FIND OUT IS APPROXIMATELY
17 HOW MANY?

18 A I DON'T REMEMBER.

19 Q WELL, I KNOW YOU DIDN'T COUNT THE CARS, BUT I
20 AM JUST WONDERING WAS IT A LARGE NUMBER?

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

22 THE COURT: SUSTAINED.

23 Q BY MR. LEVY: WAS THE TRAFFIC FAIRLY HEAVY
24 COMING IN THROUGH THE FRONT GATE?

25 A WHAT DO YOU MEAN BY "HEAVY"?

26 Q WERE THERE A LOT OF PEOPLE? WAS THERE A LOT OF
27 CARS?

28 A HUNDREDS?

1 Q ANY WAY YOU WANT TO DESCRIBE IT. I JUST WANT
2 TO KNOW WHETHER A FEW CAME IN OR A LOT CAME IN.

3 A I DON'T REMEMBER HOW MANY CAME IN. THERE
4 WERE -- I REALLY CAN'T TELL YOU HOW MANY, BUT THERE WAS A
5 SIZEABLE AMOUNT OF TRAFFIC. THERE WAS ENOUGH THAT I WOULD
6 HAVE TO CONCERN MYSELF WITH GREETING THEM AS THEY CAME IN
7 AND SAY -- I SAID HELLO TO THEM, DIRECTED THEM UP THE ROAD
8 TO WHERE THEY COULD PARK THEIR CARS.

9 SO THERE WERE QUITE A FEW. I DON'T REMEMBER
10 THE NUMBER, THOUGH.

11 Q OKAY. WELL, WHILE ALL THESE PEOPLE WERE COMING
12 IN, HOWEVER MANY THERE WERE, YOU JUST TOLD US YOU WERE
13 GREETING THEM; IS THAT CORRECT?

14 A I WAS.

15 Q NOW, WERE ANY PEOPLE WALKING IN AT THE SAME
16 TIME?

17 A NO.

18 Q ALL THE TRAFFIC THAT WAS COMING IN WAS IN CARS?

19 A THAT'S CORRECT.

20 Q AND YOU WERE GREETING THEM?

21 A UH-HUH.

22 Q WERE YOU GREETING THEM DURING THE COURSE OF THE
23 TIME THAT MR. MULL WAS CHATTING WITH MR. FRANCIS?

24 A NOT ALL OF THAT TIME, NO.

25 Q PART OF THAT TIME?

26 A YES.

27 Q SO IS IT POSSIBLE DURING THE PART OF THE TIME
28 WHEN YOU WERE OCCUPIED GREETING THE PEOPLE COMING IN IN THAT

1 GROUP OF CARS, NO MATTER HOW MANY THERE WERE, THAT YOU
2 COULDN'T FOCUS ALL OF YOUR ATTENTION ON A CONVERSATION
3 BETWEEN MR. MULL AND MR. FRANCIS?

4 A YES, IT'S POSSIBLE THAT I COULDN'T FOCUS ALL OF
5 MY ATTENTION ON THE CONVERSATION, THAT IS CORRECT.

6 Q SO WOULD I BE CORRECT IN ASSUMING THAT THERE
7 MIGHT HAVE BEEN SOME EXCHANGE THAT YOU DID NOT ACTUALLY
8 HEAR?

9 A VERY POSSIBLE.

10 Q NOW, WHILE YOU WERE FOCUSING YOUR ATTENTION ON
11 ALL THESE CARS THAT WERE COMING IN, WHILE YOU WERE GREETING
12 ALL THOSE CARS, IS IT POSSIBLE THAT ANY GROUP OF PEOPLE WHO
13 WERE CONNECTED WITH THE CHURCH COULD HAVE APPROACHED THE
14 GROUP OF PEOPLE THAT YOU DESCRIBED AS SURROUNDING MR. MULL
15 AND MR. FRANCIS?

16 A NO. BECAUSE I WAS STANDING RIGHT THERE WHERE
17 THEY WERE.

18 Q AND YOU WERE ON DUTY WATCHING OUT FOR THEM?

19 A I WAS STANDING RIGHT WHERE MR. FRANCIS, MR.
20 MULL WERE.

21 Q AND YOU DIDN'T SEE ANYONE ELSE APPROACH THAT
22 GROUP OF PEOPLE?

23 A YES. I SAW TOM MILLER CAME DOWN A LITTLE LATER
24 ON. I DON'T REMEMBER THE EXACT -- HOW MUCH LATER HE CAME
25 DOWN AFTER EDWARD. AND MONROE WAS THERE STANDING OFF TO THE
26 SIDE AT ONE POINT. HE CAME DOWN TOWARDS THE VERY END OF THE
27 CONVERSATION.

28 THERE WERE STAFF MEMBERS WHO CAME OUT OF THE

1 GRAPHICS BUILDINGS, LADIES WHO WERE WORKING GRAPHICS, MAYBE
2 A COUPLE OF GENTLEMEN WHO WALKED BY ON THEIR WAY UP TO THE
3 SQUARE DANCE.

4 Q SO THERE WERE OTHER PEOPLE THAT CAME INTO THE
5 AREA?

6 A A FEW STAFF MEMBERS WHO WALKED BY, YES.

7 Q YOU SAID SOMETHING THAT PUZZLED ME A LITTLE
8 BIT. YOU SAID IF EVERYBODY WAS DRESSED IN KARATE ROBES, YOU
9 CERTAINLY WOULD HAVE NOTICED THEM.

10 ARE THE PEOPLE IN THE SECURITY DEPARTMENT AT
11 CAMELOT TRAINED IN KARATE?

12 A I DON'T KNOW. I DON'T UNDERSTAND THAT
13 QUESTION.

14 Q THAT IS NOT A HARD QUESTION. IS THERE A
15 SECURITY DEPARTMENT AT CAMELOT?

16 A THERE MAY BE.

17 Q YOU WERE ONLY THERE FIVE, SIX YEARS AND YOU
18 DON'T KNOW, DO YOU?

19 A I DON'T KNOW WHAT THEIR PRACTICES ARE NOW. I
20 AM SURE --

21 Q WHEN YOU WERE THERE -- MA'AM, IT IS NOT A
22 DEBATE. I GET TO ASK QUESTIONS, YOU GET TO ANSWER THEM.

23 A I KNOW. I AM SORRY.

24 Q WHEN YOU WERE THERE AT CAMELOT, WAS THERE A
25 SECURITY DEPARTMENT?

26 A I BELIEVE THERE WAS.

27 Q DO YOU HAVE ANY KNOWLEDGE AS TO WHETHER OR NOT
28 THEY WERE TRAINED IN KARATE SINCE YOU BROUGHT UP KARATE

1 ROBES?

2 A NO, I DON'T.

3 Q I AM CURIOUS AS TO WHY YOU --

4 A I DO NOT KNOW --

5 Q MA'AM, I WILL ASK THE QUESTIONS AND I THINK IT
6 WOULD BE NICE IF YOU JUST ANSWERED THEM.

7 MR. KLEIN: YOUR HONOR, I THINK THE WITNESS WAS
8 EXPLAINING HER ANSWER AND THAT IS CERTAINLY PROPER.

9 THE COURT: IT WOULD HELP IF SHE WOULD ANSWER. MAYBE
10 I CAN ASK A COUPLE OF QUESTIONS AND WE CAN MOVE THIS ALONG.

11 WERE THERE PEOPLE AT CAMELOT WHEN YOU WERE
12 THERE WHO HAD AMONG THEIR RESPONSIBILITIES SECURITY?

13 THE WITNESS: YES.

14 THE COURT: I UNDERSTAND THEY MAY HAVE HAD ADDITIONAL
15 RESPONSIBILITIES, BUT AT LEAST THERE WERE SOME PEOPLE WHO
16 HAD RESPONSIBILITY FOR SECURITY?

17 THE WITNESS: THAT'S CORRECT.

18 THE COURT: IS THAT CORRECT?

19 THE WITNESS: YES, IT IS.

20 THE COURT: SO FAR SO GOOD?

21 THE WITNESS: RIGHT.

22 THE COURT: NEXT, APPROXIMATELY HOW MANY PEOPLE HAD
23 RESPONSIBILITY FOR SECURITY?

24 THE WITNESS: THAT I DO NOT KNOW.

25 THE COURT: CAN YOU APPROXIMATE?

26 THE WITNESS: I CANNOT. I WAS NOT IN THE SECURITY
27 DEPARTMENT. IF THERE -- I DON'T KNOW HOW MANY PEOPLE --

28 THE COURT: GIVE US A RANGE. ONE HUNDRED TO ONE

1 HUNDRED FIFTY, OR FIVE TO TEN, OR THIRTY TO FORTY OR
2 WHATEVER THE NUMBER.

3 THE WITNESS: VERY TRUTHFULLY I DON'T KNOW.

4 THE COURT: ALL RIGHT.

5 THE WITNESS: I WAS NEVER INVOLVED IN SECURITY.

6 THE COURT: DO YOU -- YOU UNDERSTAND THE EXPRESSION
7 "MARTIAL ARTS"?

8 THE WITNESS: YES.

9 THE COURT: HUM?

10 THE WITNESS: YES, I DO.

11 THE COURT: OKAY. DO YOU HAVE ANY INFORMATION THAT
12 ANY OF THE PERSONS THAT WE HAVE BEEN TALKING ABOUT WHO HAD
13 SOME RESPONSIBILITY FOR SECURITY WERE TRAINED IN THE MARTIAL
14 ARTS?

15 THE WITNESS: YOU MEAN DO I HAVE ANY INFORMATION ANY
16 OF THE PEOPLE WE WERE TALKING ABOUT, MEANING THE PEOPLE WHO
17 WERE DOWN AT THE FRONT GATE ON THAT DAY?

18 THE COURT: YES. LET ME START OVER. THINK FOR A
19 MOMENT ABOUT ALL OF THE PEOPLE WHO HAD SOME RESPONSIBILITY
20 FOR SECURITY.

21 THE WITNESS: UH-HUH.

22 THE COURT: WHEREVER THEY WERE THAT DAY.

23 DO YOU HAVE ANY INFORMATION THAT ANY OF THEM
24 HAD SOME TRAINING IN ANY OF THE MARTIAL ARTS?

25 THE WITNESS: IT IS A DIFFICULT QUESTION. I DON'T
26 KNOW TOO MUCH ABOUT THE SECURITY DEPARTMENT. I DON'T KNOW
27 HOW MANY PEOPLE WERE INVOLVED IN SECURITY.

28 I KNOW THAT THERE WAS A DEPARTMENT. I DON'T

1 KNOW HOW MANY PEOPLE, SO I DON'T KNOW -- AND I DON'T KNOW IF
2 THOSE PEOPLE WERE INVOLVED IN MARTIAL ARTS TRAINING. I DO
3 NOT KNOW.

4 THE COURT: DO YOU KNOW IF ANYBODY AT CAMELOT HAD ANY
5 TRAINING IN ANY OF THE MARTIAL ARTS?

6 THE WITNESS: I DON'T KNOW.

7 THE COURT: GO AHEAD.

8 Q BY MR. LEVY: WOULD IT BE A FAIR STATEMENT,
9 BASED ON THE QUESTIONS YOU'VE JUST ANSWERED, THAT YOU DON'T
10 KNOW WHO AT CAMELOT WHEN YOU WERE THERE WAS PART OF THE
11 SECURITY FORCE AND WAS TRAINED IN THE MARTIAL ARTS?

12 MR. KLEIN: I AM GOING TO OBJECT, YOUR HONOR. THERE
13 IS TWO QUESTIONS THERE AND IT IS A COMPOUND QUESTION. IT
14 ASSUMES -- THE FIRST ASSUMES THE SECOND.

15 THE COURT: WHY DON'T YOU BREAK UP THE QUESTION.

16 Q BY MR. LEVY: WOULD IT BE A FAIR STATEMENT,
17 BASED ON YOUR TESTIMONY TO THE JUDGE, THAT YOU DON'T KNOW
18 WHO WAS INVOLVED IN SECURITY?

19 A THAT'S CORRECT.

20 Q WOULD IT ALSO BE A FAIR STATEMENT WHILE YOU
21 WERE AT CAMELOT, THAT YOU HAVE NO IDEA WHO IT WAS THAT
22 TRAINED IN THE MARTIAL ARTS?

23 A THAT IS ALSO CORRECT.

24 Q WOULD IT ALSO BE A FAIR STATEMENT YOU WOULDN'T
25 KNOW WHICH OF THE PEOPLE WHO APPROACHED THE LITTLE GATHERING
26 YOU DESCRIBED TO US MAY OR MAY NOT HAVE BEEN SECURITY, WOULD
27 YOU?

28 A THAT IS A DIFFICULT QUESTION TO ANSWER.

1 Q WHY DON'T YOU TRY.

2 A WELL, AS I RECALL, SOME OF THE PEOPLE WHO
3 WALKED BY WERE LADIES, OLDER LADIES WHO WORK AT GRAPHICS. I
4 WOULD HARDLY IMAGINE THAT THEY WERE INVOLVED IN MARTIAL
5 ARTS.

6 Q BUT YOU WOULDN'T KNOW, WOULD YOU?

7 A TRUTHFULLY NOT.

8 Q SO IN ANSWER TO MY QUESTION, YOU DON'T KNOW WHO
9 OF THE PEOPLE THAT CAME BY WERE ON THE SECURITY DEPARTMENT
10 OR WHICH OF THE PEOPLE MAY OR MAY NOT HAVE BEEN TRAINED IN
11 THE MARTIAL ARTS, WOULD YOU?

12 A NO, I DON'T.

13 Q DOES IT MAKE YOU UPSET TO SAY NO, YOU DON'T?

14 A NO.

15 Q HOW MUCH DID YOU SELL YOUR HOUSE FOR?

16 A \$80,000.

17 Q DID YOU GIVE IT ALL TO THE CHURCH?

18 A NO.

19 Q MOST OF IT TO THE CHURCH?

20 A A BIG PORTION OF IT.

21 Q DID YOU HAVE ENOUGH LEFT OVER TO MOVE ALL YOUR
22 BELONGINGS DOWN TO PASADENA WHERE THEY WERE LOCATED AT THE
23 TIME?

24 A YES, I DID.

25 Q DO YOU RECALL WHO MOVED YOUR PERSONAL
26 POSSESSIONS AFTER THE SALE OF YOUR HOME TO QUARTERS IN
27 PASADENA?

28 A YES, I DO.

1 Q WHY DON'T YOU TELL US WHO IT WAS.

2 A DONALD TROWBRIDGE AND I DON'T REMEMBER THE
3 OTHER PERSON.

4 Q PUT YOUR STUFF ON THE CHURCH BUS AND MOVED IT
5 RIGHT ON DOWN TO PASADENA?

6 A THAT'S CORRECT.

7 Q WERE YOU PERMANENT STAFF WITH THE CHURCH?

8 A NO, I WASN'T.

9 Q YOU WERE JUST -- WERE YOU EVER PROBATIONARY
10 STAFF WITH THE CHURCH?

11 A YES, I WAS.

12 Q DO YOU KNOW WHETHER OR NOT THERE IS A
13 REQUIREMENT AT THE CHURCH WHEN YOU BECOME PERMANENT STAFF,
14 YOU DIVEST YOURSELF OF ALL YOUR REAL AND PERSONAL PROPERTY
15 AND TURN IT OVER TO THE CHURCH?

16 A NO, I DON'T KNOW.

17 Q YOU WERE ONLY THERE FIVE OR SIX YEARS, BUT YOU
18 DON'T KNOW THAT?

19 A I WAS NEVER ASKED TO DIVEST OF MY PERSONAL --

20 Q THAT IS NOT MY QUESTION TO YOU, MA'AM. WHAT I
21 SIMPLY ASKED YOU WAS DO YOU KNOW WHETHER OR NOT WHEN YOU
22 BECOME PERMANENT STAFF, THE RULE AT CAMELOT IS THAT YOU --
23 THE RULE AT THE CHURCH IS THAT YOU TURN OVER YOUR REAL
24 PROPERTY AND --

25 A I WAS NEVER APPRISED OF THAT RULE.

26 Q YOU JUST TURNED IT ALL OVER ANYWAY?

27 A I DIDN'T TURN IT OVER. I KEPT IT.

28 Q DID YOU MAKE A DONATION TO THE CHURCH?

1 A I DID MAKE A DONATION TO THE CHURCH. BUT I
2 KEPT MY PERSONAL EFFECTS AND BELONGINGS, FURNITURE.

3 Q WHEN YOU MOVED TO PASADENA, WHERE DID YOU
4 RESIDE?

5 A I RESIDED ON THE PROPERTY IN PASADENA.

6 Q AND WOULD YOU TELL US WHAT THAT PROPERTY WAS
7 CALLED?

8 A IT WAS A CAMPUS IN PASADENA ON HOWARD STREET.

9 Q DID YOU HAVE A NICE ACCOMMODATION AT THE CAMPUS
10 ON HOWARD STREET IN PASADENA?

11 A YES, I DID.

12 Q WHEN YOU MOVED THERE, DID ANY OF YOUR CHILDREN
13 MOVE WITH YOU?

14 A YES, THEY DID.

15 Q HOW MANY OF THEM?

16 A BOTH OF THEM.

17 Q WOULD YOU TELL US WHAT YOUR ACCOMMODATIONS WERE
18 LIKE WHEN YOU MOVED ONTO HOWARD STREET IN PASADENA?

19 MR. KLEIN: I AM GOING TO OBJECT AS TO THE RELEVANCY
20 AT THIS POINT, YOUR HONOR.

21 THE COURT: SUSTAINED.

22 WE WILL RESUME AT 9:15 TOMORROW MORNING.

23 REMEMBER THE COURT'S ADMONITIONS.

24 (AT 4:05 P.M., AN ADJOURNMENT WAS TAKEN

25 UNTIL WEDNESDAY, MARCH 12, 1986, AT

26 9:15 A.M.)

27

28