

BB-31

BB-32

BB-31a

Tim Stoen



*The Comrade Deputy Prime Minister &  
Minister of National Development  
Cde. P. A. Reid*

requests the pleasure of the company of  
Cde. Timothy Stoen

for a Luncheon

on 29th December, 1976 at 12.00 noon

at Herdmanston House, 19/20 Lamaha St., Queenstown,  
G/town.

R.S.V.P.  
Tel. 68808  
if unable to attend.

BB-31-a-1

CERTIFICATE OF LIVE BIRTH

1900-170

STATE OF CALIFORNIA - DEPARTMENT OF PUBLIC HEALTH		SICILY, CALIFORNIA - DEPARTMENT OF PUBLIC HEALTH		LOCAL REGISTRAR - WALTER C. CLOWERS, M.D.	
THIS CHILD	1a. NAME OF CHILD (FIRST NAME)	1b. MIDDLE NAME	1c. LAST NAME	1d. SEX	
	JOHN	VICTOR	STOEN	MALE	
PLACE OF BIRTH	2a. PLACE OF BIRTH - NAME OF HOSPITAL	2b. STREET ADDRESS (STREET AND NUMBER, OR LOCATION)	2c. CITY OR TOWN	2d. COUNTY	2e. STATE
	SANTA ROSA MEMORIAL HOSPITAL	1165 MONTGOMERY DRIVE	SANTA ROSA	SONOMA	CALIFORNIA
	3a. DATE OF BIRTH - MONTH, DAY, YEAR	3b. HOUR	3c. IF TWINS OR TRIPLETS, THIS CHILD BEING FIRST, SECOND, THIRD		
MOTHER OF CHILD	4a. MAIDEN NAME OF MOTHER - FIRST NAME	4b. MIDDLE NAME	4c. LAST NAME (MAIDEN SURNAME)	4d. BIRTHPLACE (STATE OR FOREIGN COUNTRY)	
	GRACE	LUCY	GRECH	SAN FRANCISCO, CALIF	
	5a. AGE OF MOTHER (AT TIME OF THIS BIRTH) - YEARS	5b. COLOR OR RACE OF MOTHER	5c. RESIDENCE OF MOTHER - STREET ADDRESS	5d. RESIDENCE OF MOTHER - CITY OR TOWN	
	21	CAUCASIAN	6300 EASTSIDE CALPELLA ROAD	MENDOCINO	
FATHER OF CHILD	6a. NAME OF FATHER - FIRST NAME	6b. MIDDLE NAME	6c. LAST NAME	6d. BIRTHPLACE (STATE OR FOREIGN COUNTRY)	
	TIMOTHY	OLIVER	STOEN	MILWAUKEE, WISCONSIN	
INFORMANT'S CERTIFICATION	7a. I HEREBY CERTIFY THAT I HAVE REVIEWED THE ABOVE STATED INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE	7b. PARENT OR OTHER INFORMANT - SIGNATURE (IF OTHER THAN PARENT, SPECIFY)	7c. DATE REVIEWED AND SIGNED BY INFORMANT	7d. KIND OF INDUSTRY OR BUSINESS	
		<i>Grace Lucy Stoen</i>	1-26-72	LEGAL	
ATTENDANT'S CERTIFICATION	8a. I HEREBY CERTIFY THAT I ATTENDED THIS BIRTH AND THAT THE CHILD WAS BORN ALIVE AT THE HOUR, DATE AND PLACE STATED ABOVE	8b. PHYSICIAN (OR OTHER PERSON WHO ATTENDED) - SIGNATURE - DEGREE OR TITLE	8c. DATE SIGNED BY PHYSICIAN OR OTHER ATTENDANT	8d. PHYSICIAN'S CALIFORNIA LICENSE NUMBER	
		<i>John S. Ball, M.D.</i>	1-26-72	A14087	
LOCAL REGISTRAR	9a. REQUEST COMES FROM SOLICITATION LISTS	9b. LOCAL REGISTRAR - SIGNATURE	9c. DATE ACCEPTED FOR REGISTRATION BY LOCAL REGISTRAR		
		<i>Walter C. Clowers, M.D.</i>	FEB 2 1972		

CERTIFICATION STATEMENT

This is to certify, that the foregoing is a true and correct copy of the vital record which is on file in this office and of which I am legal custodian.

SIGNATURE:

*Walter C. Clowers, M.D.*

OFFICIAL TITLE: Public Health Officer and Local Registrar

PLACE: Sonoma County Department of Public Health Services  
Santa Rosa, California

DATE OF CERTIFICATION  
FEB 11 1972

STATE OF CALIFORNIA  
DEPARTMENT OF PUBLIC HEALTH

BB-31-a-2



Sharon Amos

LUCKHOO 13/4/78 (Debbie, Sharon, Mike)

- asked him what would happen if it went against us, what would happen before an appeal/ said we absolutely wouldn't compromise on this but want to know/ told him we'd rather die than have the child taken etc.
- he said that if they decide against us, he would ask for a stay of arrest orders, nobody ever turns such a thing down/ I asked if it was a legal thing or just precedent/ he said it was precedent/ he's never known it to fail, it's granted automatically (I asked a couple of tiems about this)
- regarding the possibility in a loss of the case that the arrest order against JJ could be activated/ he said the case is not against JJ/ it's Joyce who has been intervened/ JJ is not a party to it and Joyce ~~xx~~ can always say, "I don't have the child"
- the Marshall will not execute any orders because the registrar told Luckhoo this
- they court could have acted a long time ago on this if they wanted it ~~activated~~
- they ~~are~~ stymied (Stoen) as no order is being served
- regarding: could he delay for a long long time, the judge/ he said the judge must eventually give a decision/ he ~~will~~ should give it before the end of the month but if he doesn't Sir Lionel will ~~speak~~ speak to him/ Sir Lionel ~~will~~ could go to the Chancellor or the Chief Justice ~~xx~~ if something isn't doen
- if they wanted to do anything, Sir Lionel felt they would do it now but the Registrar said he was told by the Chief Justice not to serve the papers
- ~~xx~~ regarding possible pressure on the case, he pooh-poohed that/ said "no-one has even asked me about the case" it's "forgotten"
- he said we were unnecessarily concerned
- said re immigration that he doesn't know about that order to stop John/ Sir Lionel said he himself couldn't ~~x~~ get the info
- first he said that order would have had to come from Fred Wills/ later when I said it might have been recent and came from Shahabadeen, he didn't argue that
- ~~x~~ he said "no-one is interested in doing anything to hurt you~~xx~~"
- he said he hasn't seen the PM in 3 weeks
- he doesn't think the Stoens will come here

BB-31-a-3

LIONEL LUCKHOO  
APPT W/ SHARON AMOS  
MIKE FROKES  
DEBORAH TOUCHETTE

DEBORAH TOUCHETTE  
APRIL 13, 1978

- Lionel said if the answer was "no", in favor of Stoen, he will ask for a stay of execution on the arrest order.
- He said if the orders are there they can do anything they want to.
- said no, this is not a case against Jim Mones, Touchette has interviewed, he doesn't know how they have an arrest order, Jim
- is not a party to the child, said Barnwell won't give any orders.
- said there was no written law that states he has a limited time to give a decision, but he can be pressured through the legislature.
- Sharon asked if anything could be done if Jim came to G/town and someone saw him who was a rep. of Mass, or didn't like Jim?
- Lionel said nothing could be done. The legislature General has been instructed not to serve anything.
- Lionel said he didn't know about the order of not being able to take the child out, said the order could only have come from Min. Fred Wills.
- He said "I don't think there's anyone at all interested in hurting you in Guyana.
- Sharon ref. to pressure of black outs, would there be pressure on us?
- I don't know, I haven't seen the P.M. in three weeks, I don't think so, but I don't know.
- Lionel said we were making ourselves too important, people weren't as worried about us as we thought.

OPINION:

Luckhoo was irritated at the questions asked. I think it's because he not use to having his opinion questioned so thoroughly, we ask the same questions over again, (out of concern and necessity) and because we don't pay a greater amount of money he shows impatience in giving us his time. Mike Frokes felt Sharon was too pushy in asking questions, but I don't feel she was. We wouldn't have gotten any answers if we didn't probe. I thought she conveyed concern, but was not confrontative. Mike argued the point a lot, disagreed with me on this. He pointed out that Luckhoo didn't even say goodbye. (someone came into the office as we were leaving and Lionel was talking to them and didn't acknowledge Mike Frokes good bye) I don't know if he heard him or not, but I thought we should do something for him, like take him some scotch, or some baked goods to his home because the man was irritated and I don't think we can afford for him to get hostile against us?

(We didn't ask the same questions over and over in this meeting, but asked questions that had been asked in previous meetings)

BB-31-a-4

January 6, 1977.

Peoples Temple Agricultural Project  
P.O. Box 893  
Georgetown

Dear Comrade Minister:

We are sending you the enclosed article as a forewarning that Tim Stoen has indicated he has plans to come to Guyana very soon. Stoen has been quoted in the U.S. press, having made statements that reflect negatively on Guyana (e.g., referring to Guyana as a "backward" country).

Stoen, who loves the limelight (as shown by the enclosed article), came to Peoples Temple pretending to be interested in working for the rights of the oppressed. As it turned out, he was only interested in using Peoples Temple to advance his own career as an attorney. He is not a Socialist. In fact, he has given his cooperation to the Interpol agent (Mazor) who is orchestrating the conspiracy against us. (Interpol works closely with the FBI, CIA, and U.S. Treasury Dept. Additional background is enclosed.)

We wanted you to be posted of Stoen's background in case he should try to contact you, as it is evident he is coming in an attempt to stir trouble and garner more negative publicity against us and Guyana. (The proper authorities have been notified and Stoen's visa is being revoked.) He is capable of being extremely devious and will likely employ devious tricks to manipulate uninformed persons.

We appreciate your taking the time to consider this matter.

Co-operatively yours.

*Mike Prokes*

Mike Prokes  
Associate Minister

BB-31-a-5

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*Mike Prokes*

Mike Prokes  
Associate Minister

BB-31-a-6

Sharon Amos

Lionel Luckhoo Meeting with him 212/8/78 Maria K and Sharon

- he said he was disgusted with Judge Bishop because he handled the case the way he did
  - he said he's always told us as a matter of law we can't lose tho in the beginning decision he thought we would lose
  - but he felt that Bishop was embarrassed to say he made a mistake and in court has said that the attorneys were not at all in fault but that he had received influence from abroad/ letters, phone calls and so he was going to send it back to the Chief Justice
  - Lionel said that if he was going to do this he could have done it long ago instead of waiting six months because now the case has to start all over
  - he said it is ~~axine~~ assine, illegal and purine??? because the judge can't admit he was wrong
  - he said the whole thing now goes over from the beginning
  - I asked if he could ask ~~ax~~ Bollers how long it would take/ he said he couldn't do that but if JJ goes out of the country for medical care then he'd ask Bollers
  - he said JJ should go right away out of the country for medical care/ there is nothing that the govt. would do to harm him and he shouldn't wait
  - he said JJ could even come to Georgetown
  - I said we were waiting for some kind of written assurances ~~ax~~from the govt/ as we had gotten verbal assurances but we had thought that might be why they were doing the decision
  - regarding the case being sent back to the Chief Justice / it would be for re-assigning it, but when I asked if Bollers would take the case/ he said maybe Bollers would take it himself
  - he said Bishop has botched this up more than he could believe in that he has delayed so long and now won't give a decision
- I was wondering what our relations should be with Bollers~~x~~ as I am afraid if Hughes hears we see Bollers socially he might say Bollers shouldn't be on the case.

BB- 31-a-7

TO: HILL

FRQ.: MARY RUTH

1. I think Lionel's examination of the case is perhaps much more clear than anything we could have given you, however I will add a few of the details I know in case ~~at~~ left them out.
  - A. The Prime Minister, Fred Wills, and the Chancellor of the Judiciary J.O.F. Haynes (top post in the judicial system) are advising Lionel how to handle the case insofar as Lionel does the research and they say whether it is good enough to present in court. The Prime Minister has called ~~Wills~~ four times according to Lionel to ask how the case was going (which is why I think Lionel has taken such a sudden interest in it). The Chancellor has called him several times but Lio has had to call Wills.
  - B. The court is going to nullify all of the orders for arrest of child and arrest of you and enter at the same time that Jeffrey Haas is not even qualified to represent the mother as he has no authority. If the Judge which Joyce appeared before on Friday remains hostile, then it will go before the Full Court and if they won't throw out the orders, then it goes before the Court of Appeal (which is the Chancellor) and he will throw it out. The Judge Aubrey Bishop asked Minister Wills why he didn't tell his government was interested. Wills, according to Wills, informed Bishop that whether government was interested or not, "bad law was bad law." There is no reason to believe that Judge Bishop will be on our side. If he finally agrees, it will be done quickly; if not it will just take a little longer. It is assured that we will win the case as it stands now.
  - C. The procedure could be drawn out, however, Wills did indicate that it would be finished before October 6.
  - D. Wills is keeping a very close eye on the matter. He even knew that Karen was waiting outside of the courtroom when Joyce was inside. However, so was Richard McCoy and his assistant Dennis Reese.
  - E. I have enclosed a letter which was sent by Luckhoo to collect fees.
  - F. Karen has not been approaching Langley at all recently because of two reasons. We ascertained that he really didn't have any large amount of money that he would be willing to spend on her, and then after getting that message, we stopped. It was very difficult to keep up with that anyway because we didn't have much spare time. However, to even get some of those outrageous fees cancelled would be quite a savings.

BB-31-a-8

TO: JIM  
FROM: PAULA

COMMENT ON LUCKHOO

1. I think that we were dooped by Luckhoo over this Mazaharally issue. Luckhoo had told us that Reid had said that we were not to be touched which is exactly what Clarke is saying that Reid said. Then later & Luckhoo who had told us this and who was also the legal representative for Mazaharally said that we had to settle or they would get another lawyer and take it to court. He advised that we settle and we did.

DENTIST:

Could

DTJ-  
buy in another  
radio

216 912  
2/10/72  
LAW

BB-31-a-9



LUCKHO Monday x (this week)

- said that he didn't know ~~where~~ where we'd get blood tests etc for Jim to prove paternity, we'd have to call the pathologist (we'll do that)
- he ~~said~~ said if we wanted to sue re Bedford trucks & (apparanently you really didnt mean trucks but wanted to know about suing a newspaper so we'll have to ask again), we'd have to go to England and get a lawyer, he couldn't recommend one/ or we could give a report here to the British High Commission
- he said that any press now wouldn't have any affect on the case
- he has heard nothing about the case
- regarding the PM and seeing him in the US, the PM didn't say anything about seeing us/ Luckhoo just has the feeling, he'd be easier to see if someone from the US contacted him when he was in the US, but we shouldn't try to set it up here / Luckhoo could tell us when PM ~~is~~ leaves for the us

BB- 31-a-10



LIONEL LUCKHOO TALK

-Joyce's contest is based on the Father contesting it; it will be difficult to hold the child without the legal father's consent.

1-they cannot make headway if the child is in Guyana and not where service is accessible or with the cooperation of the government so no papers can be served.  
2-unless there is service they can do nothing

The Registrar, Chief Marshall has no intention of serving the papers without telling us.

-we are buying time which could work for 2,3,5 years  
-adoption is the only thing that is irrevocable.

3-Luckhoo feels that TOS should contest the action up North, otherwise they are going to be giving custody to the mother by default.

-McCoy told Luckhoo that he had visited our project and found it satisfactory and that he was reporting that to Washington. He said adverse publicity has caused some of our problems. His attitude w/ Luckhoo was that he was not interfering on their behalf. (Obviously we don't know that, in fact it looks the other way)

-Luckhoo has read the Observer and Newsweek stories on us.

Elements in the case that are in our favor:

- 1 she has sworn to no affidavit here
- 2 Hass has not shown authority or even that he is really her attorney
- 3 he has filed no power of attorney here although he had some paper on her behalf
- 4 His affidavit is pointless -mother, father???
- 5 The affidavit is inadmissible-heresy
- 6 There can be no substitute service in this case
- 7no legal service has been made

Hughes knows he has not followed the procedure. He wanted Luckhoo to go to the States so that he could get paid more. He did not elaborate on this point and just implied Hughes was out for a buck.

Basis of our case is that we are holding on to a valid custody documentation.

- asked about if she rescinded it--then we are depending on the father
- technically since both signed it, both should rescind it
- if she goes x-partie, the court may award her provisional custody

If Grace gets absolute custody and rescinds her order

- Grace could get a Habeas Corpus here against Joyce and JJ
- the papers would not be served
- we are buying time as they could come back again and again

Luckhoo suggested some way to buy her out .

-he says if you pay her, to make sure it is traceable. I didn't understand all the reasoning behind this and would have to discuss it further if we decided to do this.

-he suggests communicate to her: JJ of course is the father, and he will fight to the end. If you want a major skirmish here or there, keep it up.

We will go public on everything. --mentioned a legalistic concept of blackmail (he says --keep the threat of going public as an ace use it. ) In other words don't go public until we have tried this as leverage on her.

-you should adopt if that occasion is ever possible, say they will make an unholy stink about it

-Hughes does not know the paternity of the child

BB-31-a-11

LUCKHOO

- said Hoyt is a good lawyer, very cleaver
- he has a good reputation with the government
- he said legally you have a perfect case, unlikely the judge will have the courage to change the situation/ in the meanwhile you can do nothing
- Luckhoo said he himself is not a member of govt or in any way associated with govt.
- Luckhoo said he spoke to Wills and Wills is a strong supporter of PT, he said that he believes our relationship with Reid is good (Wills told Luckhoo this several times before the article was written)
- we should write for an appt with Hoyt,
- your position is not any different (dispite Wills \* resigning), the govt has permitted you to come to Guyana and stay
- k when ~~asked~~ told we could never give up the child, he said - then don't, if you take the child across the border, the govt ~~wouldn't~~ wouldn't do anything, he didn't think
- he said Hoyt situation, \* you can do nothing by belaboring the issue

BB-31-a-12

See pg 3 Positive

Sir Lionel 17/2/78 Sharon, Tim, Jocyn??

- said that it is good if ~~Viki~~ Viola comes to visit in March
- Burnham is going to the US in April/ he told Lionel he had a very tight schedule because soon after the budget he's going abroad
- Sir Lionel has heard nothing new about the decision
- he still feels we aren't going to win the first time/ he knows Fred Wills ~~was~~ always very optimistic
- It involves Judge Bishop's personal pride
- if you don't want to return the child you won't do it
- don't ~~x~~ tell people outloud of the support you have from the govt. - doesn't know if Wills being out of office will change it
- ~~he~~ can't comment about Minister Hoyt, he's his own boss, he took exception that it was suggested that we were the only facility/ "let sleeping dogs lie" if you try to cure a small ailment it becomes big (later we found he was the attorney for Hoyt)
- Hoyt won't write another letter
- can only advise us on the legal situation not on the political trends
- he has some ideas about Wills resigning, but can't say
- legally will help you, can't give you assurances, can't tell you ~~whom~~ whom to talk to
- re having him talk to the PM, if you are in difficulties Lionel can help you but can't be your advocate with the PM without ~~x~~ reason/ if you were in a major problem Sir Lionel would go to see him for us
- see the PM only when he calls Sir Lionel not when Sir Lionel wants to see him
- he knows that when the case was beginning before they granted the joint custody (Joyce and JJ) the PM was very favorably interested
- can't ask the judge when the decision will come/ after 6 mos. ~~they~~ then can say his clients are anxious but it isn't even 6 mos. yet
- didn't agree that we should get in touch with Hoyt/ let it ride

BB- 31-a-13

Notes made at continued hearing ①

Lonel Luckhoo:- Objects to affidavit filed by Grace Stoen which seeks to cure a basic irregularity.

We asked for 4 Orders - The first was the joinder of Touchette This was granted. The other Orders (b) (c) (d) are based on

1. No affidavit by Kether
2. Affidavit by one Haas - who has no accompanying Authority  
- who is not entitled to possession or custody of child
3. If 2 is accepted he did not show urgency
4. Transgression of all basic principles for the grant of habeas corpus
5. Bad Service - No service - <sup>Substituted service</sup> ineffectual

Hughes now seeks to regularise and cure a fundamental irregularity re points 1+2 above

Hughes:- At any stage the irregularity which is not basic re Authority can be cured

Bishop J:- Grants admission of affidavit and asks if Authority to Touchette is withdrawn by Grace does this not bring Matter to an end

LAL:- It certainly does not. We must look at what was before the Judge when he made the Orders which we claim are a Nullity

Hughes Grace Stoen Touchette's Application to Court was dated 5<sup>th</sup> Sept<sup>r</sup> '77  
~~She~~ rescinded her Authority to Touchette on 30 Aug '77

Bishop J:- When was Touchette notified?

Hughes:- 14 October 1977

LAL:- BB-31-a-14 And this was after Touchette was joined  
(~~note as to Touchette at 3p~~)

Bishop J:- At the moment then there is no right for Touchette to have the child.

Hughes:- She claims she had custody of the child when she swore to her affidavit and we feel the child must be brought to Court by her now.

LAL:- We are getting into a saga & losing sight of the issues. Touchette is joined by the Court in her application she asks for orders declaring the original orders appt Jim Jones be deemed a nullity because of procedural irregularities. We have all addressed the Court at length and it is for the Court to decide. This I ask the Court to do now.

Hughes:- I have other points to add

Bishop J:- Do you wish to have any further affidavits sworn by Touchette in answer to Grace Stoen

LAL:- No I do not deem it necessary.

Bishop J:- I feel you should think about it & then decide

Hughes then continues his address:- asking for an Order against Joyce Touchette for the immediate delivery of the infant to her. Court should make this Order

Bishop J:- Now that she is joined you say she is subject to Orders which I can make?

Hughes:- Yes

Bishop J:- well we will hear Sir Lionel on this later BB-31-a-15

Hearing will continue <sup>3.</sup> day after day thereafter, starting Tuesday next!

My personal observations

The judge is misled <sup>(a)</sup> He ought not to entertain Grace Stoen's Affidavit which confirms & states that Haas had authority to make the affidavit on her behalf.

<sup>(b)</sup> He loses sight of the fact that we are questioning his orders made agst Jim Jones because those orders were made on the basis of imperfect applications (i.e. the new appln filed)

The judge has stated that he is not hearing the writ application for Habeas Corpus agst Joyce Touchette as it came up before another judge, yet the judge is listening to arguments advanced by Hughes that Joyce Touchette should now be ordered to produce the child. I have not replied, but

when doing so will point out that Joyce Touchette in her affidavit NEVER said she had physical custody of the infant at that time. She said she and the others inclg. Jim Jones had custody documents & this she appended to her affidavit showing she was entitled to custody but not declaring she had physical custody.

<sup>(c)</sup> I do not feel Joyce should swear any further affidts. She had to do so to be joined. Now she is joined, we are arguing our submissions on law that Bishop J's Orders are a nullity.

<sup>(d)</sup> It strikes me that Bishop J who is listening carefully is reluctant to declare his own Orders bad. Having heard all of our arguments then, except Hughes had anything new to add the matter should (over) BB-31-a-16

(4)

have ended, but permitting Hughes to say that the Applicant Touchette should have Orders made against her & she should produce the child is pointless & confusing & ridiculous.

I have no intention of rearguing our case. We had 2 weeks of hearings & authorities & except for pointing out the observations I have made herein I shall not

be induced to fall into error of defending a situation which does not arise, viz. <sup>that we must defend Touchette re an alleged request for orders to produce the child.</sup>

When the case was being heard in Chambers Grace her husband, & Haas being present... the Orderly said that the Stoens were required at the Station for report & they had to leave while Hughes made some inaudible comments questioning the right of the police why? etc.

\* Habeas Corpus Proceedings already  
I will have to go before the judge  
is granted the Nisi (I think Collins)

BB-31-a-17

MONDAY, JAN 23

To: Jim

From: Paula

(GIVEN OVER RADIO)

SUBJECT: CONVERSATION WITH LUCKHOOD

1. He called Monday Jan 23 to say that he wouldn't give details but it came from the top that we are not to discuss with anyone government's support for us in these custody matters. He said, especially not with the Americans and Dick McCoy.

2. I told Lionel we never have and that from the start McCoy was saying that he was getting involved because he thought government was leaning toward us. I said McCoy is trying to start something to make it difficult for us that we have never discussed anything with him. Lionel said he explained that we were not doing so to the man he spoke with but he said he just wanted us to be careful to not step on the golden goose (or some such anecdote). Lionel was very optimistic and sounded more confident about government's support and he alluded that it was the Prime Minister he spoke with.

3. My ~~conclusion~~ various conclusions or opinions are as follows: P1 - 2 - 1E - 88

(A) CYNICAL - WE ARE BEING PREPARED FOR GOVT.

BB-31-c-18



HAVING AN OBT BY STATING WE BROUGHT IT ON OURSELVES. THIS IS A POSSIBILITY - NOT A CONCLUSION.

(B) U.S. EMBASSY IS USING DEVISIVE MEANS TO REACH THEIR RESULTS BY STATING WE ARE BRAGGING ABOUT GOVT. SUPPORT.

(C) FRED WIGGS HAS TOLD THE P.M. SOMETHING ABOUT US BEING DIFFICULT.

(D) BONNIE MANN HAS TOLD THE P.M. THAT WE ARE BRAGGING GOVT. SUPPORT AND PERHAPS WE ARE BEING WARNED TO NOT TALK TO MANN BECAUSE OF HIS ALLIANCE WITH THE U.S.; OR MCCOY IS TELLING MANN WE BRAGGED GOVT. SUPPORT AND MANN IDENT TO THE P.M.

BB-31-a-19

81-5-1E-09

Luckhoo meeting 17/1/78\*

(Re being able to sue ~~Barry Bannister~~ Haas for saying PT paid off the judge)

PT is not an official person, so can't sue

-if said a particular person JJ gave officials money, then could sue, but would need witnesses and would need to know when it was said

-the arrest order of JJ is not stayed tho it is not served

-Re having the case tried in California. he said it's a law of form vs a law of origin. Conflict of laws doesn't arise if being heard here. but it could be tried there in Calif. also, couldn't hurt. Affidavits are not tenable from the States. ~~but~~ if you try it in the states as well as here, could use it as a subsidiary argument that it was tried in US. It isn't automatic that it would influence the decision here but couldn't hurt. Luckhoo doesn't have the books to research Calif. law. Grace filed her affidavit for divorce but it wasn't looked at here as it is Calif. paper tho it had custody awarded in Calif.

-Luckhoo said he doesn't know when he can fly to Jonestown as he has murder cases he is dealing with, maybe the end of the month

PT being incorporated

-have to register thru the Beeds Registry. No-one can bring action against us now/ or could register under "friendly societies" - welfare organizations have limited powers, could sue and be sued.

-any publishing of statements that Guyana govt. is corrupt (or takes bribes), by Haas or other people should be brought to Luckhoo's attention

-could write and make a formal protest with Wills because of Haas making his statement of corruption to an American Official

-Stoens can bring this case up again

-if we want our questions answered, he said to write them out, or our attorneys can write out their questions and he'll answer them in writing. then there would be no misunderstandings.

BB- 31-a-20

of acres have been planted in crops such as yams, corn, sweet potatoes, citrus, and avocado.

In addition to the agricultural and livestock programs is extensive community development. Three houses, a workshop, an equipment maintenance station, a warehouse, a shoe repair shop, and a church/community center have been built by the Peoples Temple mission workers. The cooperation and assistance given by this fine government's agricultural advisors, as well as from many other government departments, has been invaluable.

Pastor Jones extends his gratitude to all of our Guyanese brothers and sisters for their interest and encouragement. Although he hasn't much time for travel because of his busy and hectic schedule ministering to the three large United States based churches, he does enjoy hearing from you and gives every letter he receives personal attention.

May God Bless You.

\* \* \*

Please feel free to write:

Pastor Jim Jones  
Peoples Temple Christian Church  
P.O. Box 893  
Georgetown  
Guyana, South America

or

Pastor Jim Jones  
Peoples Temple Christian Church  
P.O. Box 214  
Redwood Valley, California 95470 U.S.A.

BB-31-a-21

Conversation between Lionel Luckhoo and Karen  
October 1, 1977

Court went all day. He will finish tomorrow.  
Bishop (Judge Bishop) is taking the case quite well.  
Lloyd also spoke to Judge Bishop and gave his presentation, as did,  
Edward, who is Lionel's nephew.

Bishop (Judge) has already ordered the charges against JJ dropped, as he  
admitted they were wrong.

Conversation between Lionel & KL on October 2, 1977

He said they concluded the orders made by the judge affecting the child.  
After a number of days of arguments and authorities, Hughes will commence his  
reply on Monday. The judge seemed very favorably inclined when Lionel said  
he pointed out that a chain was as strong as its weakest link, and that a chain  
for the creation of the writ of habeas corpus had ... tissue thin links which  
broke under scrutiny.

Points made:

- 1) Abdication (sp?) can only be made under the law by the mother, father or  
guardian and this was not done.
- 2) One of them would have to swear to show the child was unlawfully detained.
- 3) There is no affidavit in court by Grace Stoen.
- 4) Judge Bishop has agreed with us that Grace has not made an affidavit because  
it had to do with the matrimonial situation between her and Tim, and was not  
relevant to the present situation with John.
- 5) The affidavit by Haas transgressed all laws of affidavits in that he repeated  
heresays without giving the source of the information, and he said that he  
believed it
- 6) Haas was dishonest in court. There were features that should have been  
brought to the court's attention, such as Grace Stoen having come to  
Guyana, John having been here off and on for 3 years,  
and the fact that the custody papers were in the hands of Mrs. Touchette.
- 7) Lionel said they also attacked the service of events which he said must be  
personal.
- 8) The return of service was bad by Haas in that he swore that JJ could not  
be found. He would have to show what efforts had been made to find JJ.

Lionel cited a large number of authorities from the United Kingdom and the  
Dominions and elsewhere which all confirmed the points he made.

Lionel feels that Hughes is conscious of the weakness of his position and it  
would not surprise me if they were to capitulate at a later stage.  
Lionel feels what they are about is to have it drag on till Oct. 6, and  
then get the courts in the US to move for contempt against JJ to get an order  
for his arrest in the US. That order would have no effect in Guyana but  
it seems to Lionel that TOS should resist the actions being brought by his  
wife and he could ask for the adjournment of the case by citing the unfit-  
ness of Grace.

Since JJ has received no papers, Charles Garry could state it's not possible  
to reach him.

BB-31-a-22

Lionel Luckhoo  
31/7/78  
Sharon, Maria

We only talked to him for a few minutes. He agreed to write the letter to Iverson requesting that he get TOS to take a paternity test. He said he has never recieved a reply to the last letter he wrote him. We asked if he had heard anything more about the case and he said no, but that he had talked to Frankie and asked him to talk to Terrance about it. He thinks this is the only way anything is going to get done. Sharon asked him if he thought Frankie would actually talk to Terrance about it and he said yes. Luckhoo said Rudolph is a very irresponsible person and he does not like the way he handles things. He had just gotten back to his office from court where K&H Rudolph had said he was going to give a decision on another case and then did not do it. He said he does not like the man.

-----

Ray Fernandez said that ~~xxx~~ there is going to be a very severe food shortage because farmers are refusing to replant. He said he is glad that we are getting to be self-sufficient because food is going to be very scarce. Even now, things are very hard to get and there are long lines to get certain items like split peas. The other day there was a near riot as people were waiting to get split peas. The name of each person who purchase split peas and the amount they buy has to be turned into the Ministry of Trade because they have become a black market item.

BB-31-a-23

nh

TO WHOM IT MAY CONCERN

I, Timothy Oliver Stoen, hereby acknowledge that in April, 1971, I entreated my beloved pastor, James W. Jones, to sire a child by my wife, Grace Lucy (Grech) Stoen, who had previously, at my insistence, reluctantly but graciously consented thereto. James W. Jones agreed to do so, reluctantly, after I explained that I very much wished to raise a child, but was unable, after extensive attempts, to sire one myself. My reason for requesting James W. Jones to do this is that I wanted my child to be fathered, if not by me, by the most compassionate, honest, and courageous human being the world contains.

The child, John Victor Stoen, was born on January 25, 1972. I am privileged beyond words to have the responsibility for caring for him, and I undertake this task humbly with the steadfast hope that said child will become a devoted follower of Jesus Christ and be instrumental in bringing God's kingdom here on earth, as has been his wonderful natural father.

I declare under penalty of perjury that the foregoing is true and correct.

Timothy Oliver Stoen  
Timothy Oliver Stoen  
Post Office Box 126  
Ukiah, California 95482

Dated: February 6, 1972

Witnessed: Miracela M. Jones

BB-31-a-24

Port Kaituma North West Region  
Guyana South America

STATEMENT OF PATTY CARTMELL

I, Patty Cartmell, swear under penalty of perjury that the following is true:

I have observed how one Grace Stoen pressured Rev. Jim Jones repeatedly for sex. Grace would call me on the phone and cry, and then come over to my house where I lived close to Rev. Jones' parsonage home. She would ask Jim over and over for sex.

She was aware Jim did not want her in a sexual encounter. Jim was very kind and always compassionate. Grace would still continue on this insane issue of sex. She appeared to be obsessed with wanting sex with Jim Jones. She threatened suicide on numerous occasions.

And then I heard Tim Stoen ask Rev. Jones in the parking lot to have sex with Grace, because he (Tim) was afraid she would leave him and try to hurt Peoples Temple and bring public embarrassment to Jim Jones. So then Jim agreed, and in February or March, 1971, he did have sex with Grace at my house. She got more demanding after that and more threats came from here. Suicide and threats of hurting the church. Numerous threats to kill her husband were made. Jim had sex with her again. Grace swore she was taking birth control pills, but later laughed and said she wasn't.

I later heard Tim Stoen say he wanted Grace to have a child by Jim Jones, as he thought that might settle her down. I don't know just what he meant, but Tim seemed to want to help people, though I wasn't around him enough to know for sure.

When Grace got pregnant that began a nightmare.

*Patty Cartmell*

Dated: 15 August 1978

BB-31-a-25

TO WHOM IT MAY CONCERN

I, Timothy Oliver Stoen, hereby acknowledge that in April, 1971, I entreated my beloved pastor, James W. Jones, to sire a child by my wife, Grace Lucy (Grech) Stoen, who had previously, at my insistence, reluctantly but graciously consented thereto. James W. Jones agreed to do so, reluctantly, after I explained that I very much wished to raise a child, but was unable, after extensive attempts, to sire one myself. My reason for requesting James W. Jones to do this is that I wanted my child to be fathered, if not by me, by the most compassionate, honest, and courageous human being the world contains.

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I declare under penalty of perjury that the foregoing is true and correct.

Timothy Oliver Stoen  
Timothy Oliver Stoen  
Post Office Box 126  
Ukiah, California 95482

Dated: February 6, 1972

Witnessed: Marcia M. Jones

BB-31-a-26



SEQUENCE OF EVENTS IN BIRTH OF JOHN STOEN, LIVES OF GRACE AND TIM STOEN

- Tim and Grace were dating when they visited the church.
- Tim was the one who was primarily interested in the Temple and Rev. Jones' teachings. Grace came mainly to be with Tim.
- They were married in the Temple in Redwood Valley by Rev. Jones. Both their parents attended the wedding.
- Grace was a spoiled young woman who had fits of emotional depression and expected everyone to cater to her. She had a manic-depressive personality.
- After they were married, Tim worked in the Mendocino County D.A.'s Office and Grace attended classes at Santa Rosa Jr. College; Grace also got a job in the Mendocino County Welfare Department during the day. They set up housekeeping in a comfortable home in Redwood Valley.
- Grace's insecurities continued despite her marriage. She threatened to leave Tim and leave the church. Tim was torn and wanted help so asked Rev. Jones to do whatever he could. He mentioned that sexual attention would be in order since Grace had placed such emphasis on her desire for Jim to relate to her.
- Grace conceived a child by Jim Jones. She and Tim were not relating at the time; Grace has told many people that Jim is indeed the father.
- Grace continued to demand time and attention of Jim. She would call him at his home, even intrude on the family by coming over and demanding that he talk to her. Jim talked to her many hours at a time, many times even when his own health was poor or he had had no rest. She was extremely hostile if the slightest of her needs did not get met.
- During the early term of her pregnancy, Grace was encouraged by Jim and others to seek an abortion. She refused.
- When John was just two weeks old, Grace allowed him to spend one day a week with Carolyn Layton. Carolyn had to have John treated for severe diaper rashes, resulting from neglect.
- John was only a toddler when Barbara Cordell started keeping him day and night. Grace would see him once a week, and would frequently choose to spend time at the church socializing with adults than spending the time with John.
- John always made frequent visits to the Jones house. Grace had no success in toilet training the child, and gave him, after several others had failed, to Marceline Jones to train. She succeeded with ease in three days. John was noticeably relaxed and "at home" in the Jones' home.
- John would spend time with the Jones family on vacations, when the whole church would go on summer vacations, and on week-ends when the church members went on the buses to Los Angeles. John rode on the bus with Jim and played and talked to Jim and the boys. John insisted on calling Jim "Daddy" and even when contradicted, he insisted that the Jones boys were his brothers.
- Jim took his adopted and "natural" family along to Hawaii on a business trip, and John accompanied them.
- If Jim would take his sons to the movies, John would go along.

BB-31-a-27

- When John was approximately 3 years old, Grace and John moved to San Francisco to stay in the church. Grace decided she did not like staying in San Francisco and left John in the church to stay with Jim and returned to Redwood Valley. Maria Katsaris would babysit John when Jim was busy --which was most of the time.
- John would also make daily visits to Jim's mother Lynetta Jones, whom John called "Grandma."
- Tim Stoen was in Redwood Valley/ Ukiah when he joined Freitas' office in San Francisco. He lived separately from John when he moved to the City. He lived in the home of Leona Collier in his own quarters there and often would sleep at his office.
- When Grace was in Redwood Valley, she occasionally saw John, often not even once in a week. She would sometimes spend part of a day with him and become so aggitated that she would bring John back to the church early. John acted up terribly around Grace, and she had no ability to reason with the child.
- When Grace began her relationship with Walter Jones, she spent even less time with John. Her free time was spent with Walter usually at the Lake Mendocino or driving around. She did not make the effort to go to see John or to bring him to the Valley.
- July 4, 1976, Grace left with Walter Jones, abandoning John. She did not even say good-bye when she left. From July through October, she visited John only one time in Los Angeles, for a few hours. John was so upset by her visit that he had terrible temper tantrums and regressions and it took him several days to calm down.
- Grace talked to John a couple of times on the phone after she left. She told him to be a good socialist and that the church was good and that "Jim loved him most of all."
- In October, 1976, John went to Guyana with Grace's permission. She signed the papers for him to go. A round trip ticket was also provided for her to go to Guyana in case she wanted to visit him. John has been in Guyana since that time.

BB-31-a-28

Tim has gone out + bought

- 1 wig
- 2 negligee's
- 1 slip
- nylons
- woman's underwear

I jumped on him hard, and he told me to mind my own business. I told him he did not have the privilege to do such things + I was pissed. I said for John's sake not to do this. He said, "Oh, I think its more than that!" (Implying ME). I told him I did not care for <sup>him</sup> didn't bother him (he agreed) + wanted nothing to do with him, etc. He told me to get fucked. I told him he was defensive, + would bring to Council he said "e . . . . ."

BB-31-a-29

✓

STATEMENT ~~OF~~ IN RE CUSTODY OF JOHN VICTOR STOEN

To Whom It May Concern:

I, Timothy B. Stoen, declare and certify as follows:

I am the legal father of John Victor Stoen, a minor of the age

of 5 years, born 25 January 1972. The legal mother of said minor is

Grace ~~Stoen~~ Stoen. The purpose of this statement is to show <sup>why</sup> ~~that~~ Grace

Stoen is unfit to be awarded the custody of said minor should she ~~be~~ <sup>be</sup> ~~an~~ <sup>an</sup> ~~Alia~~ <sup>Alia</sup> ~~a~~ <sup>a</sup> ~~custodian~~ <sup>custodian</sup> or divorce action in a Guyana court, and (2) to show to the government of Guyana <sup>that she is a dangerous reactionary who has indicated she would work with the Central Intelligence Agency to do things</sup> ~~that she is a dangerous reactionary who has indicated she would work with the Central Intelligence Agency to do things~~ <sup>in July 1976 Grace Stoen abandoned said minor and ran off with</sup> ~~in July 1976 Grace Stoen abandoned said minor and ran off with~~ <sup>of light skin blond hair and light skin</sup> ~~of light skin blond hair and light skin~~

another man, <sup>to me and others</sup> She indicated before she left that she wanted said minor

to live ~~in~~ <sup>in</sup> ~~South America~~ <sup>South America</sup> ~~under~~ <sup>under</sup> the pastoral care of Rev. James W. Jones. ~~She left the~~

The man Grace Stoen ran off with <sup>is a racist</sup> ~~is a reactionary~~ <sup>who by word and deed</sup> ~~is a reactionary~~ <sup>is totally opposed to socialism.</sup> ~~Grace Stoen has herself become a reactionary~~

<sup>After</sup> ~~she~~ <sup>leaving</sup> ~~she~~ <sup>has indicated</sup> ~~that she would work for the CIA to do things for me and she would use a capitalist who~~ <sup>did not want to share, and would work with the U.S. Central Intelligence Agency to do things for</sup> ~~in September 1976 Grace Stoen reaffirmed to me and others her~~

desire that said minor live in Guyana under the care of Pastor Jones.

Said minor was brought to come to live in Guyana in September 1976,

where he has remained ever since. Grace Stoen was given a round

trip air ticket to visit her said minor in Guyana.

BB-31-a-30

TO WHOM IT MAY CONCERN

I, Timothy Oliver Stoen, hereby acknowledge that in April, 1971, I entreated my beloved pastor, James W. Jones, to sire a child by my wife, Grace Lucy (Grech) Stoen, who had previously, at my insistence, reluctantly but graciously consented thereto. James W. Jones agreed to do so, reluctantly, after I explained that I very much wished to raise a child, but was unable, after extensive attempts, to sire one myself. My reason for requesting James W. Jones to do this is that I wanted my child to be fathered, if not by me, by the most compassionate, honest, and courageous human being the world contains.

The child, John Victor Stoen, was born on January 25, 1972. I am privileged beyond words to have the responsibility for caring for him, and I undertake this task humbly with the steadfast hope that said child will become a devoted follower of Jesus Christ and be instrumental in bringing God's kingdom here on earth, as has been his wonderful natural father.

I declare under penalty of perjury that the foregoing is true and correct.

Timothy Oliver Stoen  
Timothy Oliver Stoen  
Post Office Box 126  
Ukiah, California 95482

Dated: February 6, 1972

Witnessed: Marcia M. Jones

BB- 31-a-31

## Statement from Kendra Alexander

Approximately the middle of March I received a phone call from a man who said his name was Tim Stone. He asked to speak to Mrs. Kendra Alexander. I said that this was she.

He identified himself as Tim Stone and said he was soliciting statements about Jim Jones of the Peoples Temple. I asked him what kind of statements. He replied, negative statements. I then proceeded to say he would make it worth my while. I asked him what he meant. Did he mean he would pay me to make negative statements about Jim Jones. He answered "yes."

I told him that he insulted my integrity and that I would never make statements about anyone for money but only based on my own principles & convictions. He replied that I should think it over and he would be back in touch.

Almost immediately after his phone call I called the Peoples Temple and spoke to a young woman (I cannot recall her name) and told her about this phone conversation.

I have written up these this conversation at the request of the Peoples Temple. Everything I have written is true to the best of my recollection.

Kendra Alexander  
April 7, 1978

BB- 31-a-33

...bella. GO to embassy here and explain...  
that one time. Trying to save expenses, etc. Also she should get doctor's letters.

*(Thom's photo) - ask Kierdra Alexander about*

Harry said Luchoo didn't do well for JJ. That is confid. ~~talk~~ Luchoo we don't believe it. Desmond said we were the ~~xxxxxxx~~ victims of a conspiracy. We don't know what to believe about McCoy because we don't believe what he said about you but in the second breath he said all matters like Phillip were worked out in favor of the residents. It is contradictory. He also said apparently sympathetically, it would be alright as long as the matter didn't go more than five months. He may have been wanting it done for Stoen, but he said if it was decided within five for JJ it wouldn't matter. If it went after five, the club would be interested all over again.

We have still been getting positive reports about John. We were told confidentially by someone important (don't name their name) & in an official position (two of them) that Bunny Mann would work for any side. (don't mention his name). One would do anything for money but in the long run it would make no difference. (refer to one as an important elder in Rev. Lucas's church.) & But we did not want to ask any more questions as per your advice. Therefore, we just ~~wax~~ wanted to see if you still think it's going the same way. We heard you may get an important position in the gov't and we just ~~wax~~ wanted to know if you'll still be able to handle it because we have the most confidence in you. (It's the position that Abraham declined.) Play the Dr. Moore tape to him who is a firm believer in God and would support ~~wax~~ no one that didn't believe in God. He held a press conf. when he got back.

*Haven* Bunny Mann said that there were no problems with the D.A. and thus there would be no problems for JJ's family. This came as a response to Martha and Rudi's question that you will stand behind JJ won't you? We don't expect unqualified answers but when your dealing with a consp., even tho they've manufac. nothing for a year, we don't want our support based on that kind of statement about the D.A. We don't understand why fox folks of Cassanova's persuasion would be concerned if the D.A. did not like Cassanova's people (like Jesse). It should be understood if that the D.A. if he ever did attack someone of ~~fox~~ persuasion, which both Cuvna and JJ are, it should be expected for the D.A. to attack them. We have no info. of the D.A. doing anything, but if he did it would have to be manufactured. And we don't like support to be conditional and linked to the D.A.'s mood.

*powerful*  
I have plenty of friends and money and I will take care of Jesse--implication that engineers will do it. Yasan should be told to keep this confid. This was verified. He said don't bother with ~~xxxx~~ Jordans. We have a pic of Grace and Smitty coming out of their home going to work together which should be given to Luchoo. Show to Yasan because Tim and Grace claim to be together again. TOS wants to get at our thru suits. Tell Allison about ~~the~~ Peggy's call and what was implied about mercenarism. TOS said ~~xxxx~~ there was an overreaction that they were counting on. He said for instance that they thought that Ellie was working with Peggy (TOS said this to the caller) He said "they're overreacting." Peggy did not say one way or another but the implication was that she was not.

*Get Hassan's opinion of the sign carrying. Ask him about this*

BB-31-a-34



June 1978

Peoples Temple Agricultural Project  
P.O. Box 893 Georgetown

Cdr. G. Perry  
General Manager  
Gyana Telecommunications Corp.  
97 Brickdam  
Georgetown

Dear Cdr. Perry:

We understand that most other churches and organizations in Guyana do not have communications links up into the interior region via point-to-point radio. We would like to consider this for our organization because of our need for 24-hour communication with our agricultural project field clinic at Jonestown.

Many people are coming to our clinic from all over Guyana for treatment everyday. We have had a number of medical emergencies necessitating that we contact the Guyana Police Force to come in with a mercy flight. The fact that we have not always had contact with Georgetown by means of amateur radio could easily have meant the difference between life and death as you no doubt are aware, amateur radio permits communications only during certain hours of the day. Therefore, we wish to get set-up as soon as possible for 24-hour communications. Accordingly, we are requesting any relevant information about point-to-point radio, such as costs, equipment, technical requirements, etc.

Anything you can do to expedite this request will be greatly appreciated.

Co-Operatively yours,

*Mike Prokes*

Mike Prokes  
Associate Minister

BB-31-a-35

4 June 1978

Peoples Temple Agricultural Project  
P.O. Box 893 Georgetown

Prime Minister Forbes Burnham  
Office of the Prime Minister  
Public Buildings

Dear Prime Minister Burnham:

We wish to extend an invitation to you (and whoever you may wish to bring along) to come to visit our agricultural project and medical clinic in Jonestown. In case you are not aware of it, our school has been officially accepted into the Guyana school system, which we are very proud of.

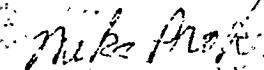
We've heard through a couple of different sources that you were recently planning to pay us a visit. Please know that you are always welcome to stop in at anytime.

Within the last month we read in the Chronicle that there is a plan to resettle white bigots from South Africa in certain countries of Central and South America (such as Costa Rica, Bolivia, and Brazil, to name a few). Enclosed is a petition that members of Peoples Temple have signed, opposing such a plan. With your permission, we would like to send this petition to the United Nations and the countries involved.

We wanted to check with you about this first because, naturally, it does reflect upon Guyana.

We appreciate what you are doing to promote socialism in Guyana and other Third World countries.

Very respectfully,



Cda. Mike Prokes  
Assistant-to-Cda. Jim Jones

BB-31-a-36

Things that need following up:

Lionel Luckhoo: Play Interview with John Moore and wife (on cassette). If he says he doesn't have time to hear it, show him their written statements. Also convey information for him from attached typed notes. Be sure Eric knows that Luckhoo plans to talk to the judge about making the decision, since so much time has passed. (He said this when I asked him if he had heard anything new, just after giving him flowers for his illness).

Mohammad Hamaludin: Wants his copy of the petition back. I've been trying to get an appointment with him first to give him background on the "concerned relatives." We've been putting him off by saying the report was sent in to the project for our attorneys to review and our boat hasn't come back yet. He was asking for a response to it. Rex Mingo, in the meantime asked him why he was doing this. Hamaludin then asked us why we told Mingo about it. He said Mingo came to him and asked him why he was harassing us. It evidently had its effect because at that point he said he ~~didn't~~ had not decided whether he was going to do a story about it. Up until then he said he wanted to do a story that gave both sides. We said that would cause people to have doubt about us because some people are always prepared to believe the worst. He disagreed with that and so we went into a 10 minute harangue to try to convince him that what we were saying was true. He didn't defend his position after that, but we still don't know, at this point, what he intends to do. Tell him ~~nothing~~ no socialist or ~~any~~ black press took it (the petition) seriously. They have given us article after article that has been positive. Show him the State dept. report where it says people are not being held against ~~their~~ their will. Make him think he would be playing into the hands of a reactionary element that automatically attacks socialist groups and persons who live in the U.S. Ask him how he can presume to write an article without seeing what we are doing in our community.

Find out what to tell Tufail, if anything. Do we follow Eric Clarke's advice?

When Dr. Baird gets back, ask him what has to be done for us to be able to perform autopsies if someone dies in our community.

Ask Dr. Harry at Min. of Health on Brickdam what forms Joyce must fill out for '78 registration. Can we get them from her to take in to Joyce?

Council of Church Board meeting at St. Andrews Church-- 9:30. We haven't been attending lately. It's quite possible that the referendum will come up. Do we want to send someone or play it safe?

What do we tell D/Costa about ~~Debbie~~ Debbie B. He's asking for her address?

Does Terri Carter have a book that the D'Costa's gave her. The daughter would like it back since it doesn't belong to them.

Follow up with Charles Hines, Nurse Noel and her assistant regarding situation with Joyce dispensing in Port Kaituma.

For Sunday 11th meeting in Kitty where PM will be speaking. How much do we get involved. Do we help get people out. Do we put the poster on our house as was requested. How visible should we be at the rally?

Call Prime Minister's Office and see if there is a response to the attached letter re: the protest petition we propose to send to certain countries. The petition was sent with the letter.

DU/PA-31-a-37

25 May 1978

Ministers of Government

From Peoples Temple Agricultural  
P.O. Box 893 Georgetown

Dear Comrade Minister:

As you are probably aware from previous correspondence, there is a vicious element of Nazi-like thugs that has been attacking Guyanese organization. They are press headline seekers, and they hold demonstrations to attract publicity. Recently, they even shoved a black woman, which was witnessed by an officer who warned them to straighten up or they would have to leave.

A man by the name of Timothy Stoen heads this bunch (Stoen was once a member of Peoples Temple—undoubtedly an agent-provocateur as he attempted to put our organization on a violent course). He hasn't been able to get much attention in the press, particularly as of late. The last demonstration attracted no coverage to speak of. (It is the little papers—such as the U-iah Daily Journal—which this type of element controls, and these papers don't mean much.) It is not so popular to attack us anymore, since much of the punch has been lost.

One of the press owners—Rupert Murdoch—has aligned himself with reactionary forces in attacking all socialists. It is a return to McCarthyism ("red-baiting") politics. One group—Syrenco—which is known and respected for its rehabilitative work—was not even socialist. But they were too progressive and they were closed down by the same type of reactionary forces working in league with a segment of the press. (We can provide other examples of socialists and progressives who have been victimized by press attacks if you are interested for any reason.)

We possess political significance to them, other than that we are socialists and we were popular (something which evidently couldn't be tolerated.) But the expressed attempt to destroy our organization has failed, though the attempt apparently continues. Recently our detractors issued a wordy statement filled with lies, distortions, innuendo, and hypocrisy. It was issued under the banner of "concerned relatives" and contained the signatures of a few dozen persons, most of whom have been here. Among the persons who signed it are several known convicted criminals.

We filed thousands of signatures in support of our organization with the insidious bigots who only could muster a meager 30 signatures. Copies of our support petition to the U.S. State Department and the National Human Rights Commission. It was signed by our supporters from the Eastern, Mid-western, Southern, and Northern U.S. Should you be with the outlandish document sent out by our detractors, we will have for anyone to see, copies of our petition (over 100 pages of signatures and telegrams of support and good wishes), statements of relatives of residents (these are relatives who visited the project, all of whom had a point-by-point answer to the accusations and falsities about us, which are clearly exposed. (The Ministers of Home Affairs and Development have already been sent these materials.)

A friendly editor-reporter of one of the large newspapers in Guyana who is familiar with our work, told us that the true story will now

BB-31-a-38

... in the ... from in California, ...  
when a very climate is created, the press doesn't want to change it. ...  
said it would hurt the ... reputation to reverse itself by printing the  
truth, after a false climate has been established. She said once the press  
has created an image of something, it is too arrogant to admit it even  
in making that (false) image, even though one day they will be caught. ...  
journalist called it a veracity conspiracy against us and said that if she  
were to print the truth about our good work, she would be fired. We would not  
her news, but we're reluctant to ... because if she is quoted, it  
could cost her job. However, we will provide it on an individual basis  
because we feel they are not doing any good ...

To paraphrase what many who have stood through the years for social  
justice have said-- this is an intentional campaign to destroy a program  
organization that has been effective in helping countless thousands of people  
indefinitely of our ... We are an open book and have nothing to  
hide and we will be happy to answer any questions that our friends and  
colleagues wish to ask. So please don't hesitate if there is something about our  
organization or work here in Guyana that you wish to clarify.

Thank you for your time and consideration of the issues that I've ...

Co-operatively yours,  
*Mike Prokes*  
Mike Prokes  
Associate Minister

BB-31-a-39

POWER OF ATTORNEY AND -- GRACE L. STGEN  
PARENTAL CONSENT TIMOTHY O. STGEN

1. Parental consent to allow John to go to Guyana, dated March 9, 1976.
2. Authorizes Joyce Touchette as guardian
3. Appoints Sharon Cobb, Jim Jones, and Helen Swinney as attorneys-in-fact.
4. Above named have right to care and custody for John anywhere in the world.

\* Date of John's birth is incorrect on this form

BB- 31-a-40

PARENTAL CONSENT  
AND POWER OF ATTORNEY

STATE OF CALIFORNIA )  
COUNTY OF Mendocino ) ss.  
UNITED STATES OF AMERICA)

I, Grace L. Stoen and Timothy Stoen hereby declare:

1. I am the natural parent /~~legally guardian~~  
of John Stoen, a minor, born April 27, 1974.
2. I hereby consent to said minor going to Guyana, South America, to live  
and be cared for there under the Guardianaship or custody of Joyce Touchette.

I hereby appoint Sharon Cobb of Redwood Valley, Calif.  
and Jim Jones of S. F., Calif.  
and Helen Swinney of Redwood Valley, Calif.  
as my attorneys-in-fact, jointly and severally, to take any and all action  
any of them deem fit for the welfare of said minor. By this power of attor-  
ney, I give each of the aforesaid attorneys-in-fact the right to the care,  
custody, supervision, and control of said minor anywhere throughout the world,  
and to travel anywhere with said minor throughout the world.

Executed on this 9th day of March,  
1976, at Ukiah, California

SIGNED

Grace L. Stoen

Timothy L. Stoen

Wkr \_\_\_\_\_

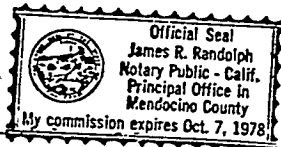
6

BB-31-a-41

STATE OF CALIFORNIA )  
COUNTY OF ) ss.  
UNITED STATES OF AMERICA)

On March 9th before me, the Undersigned,  
A Notary Public in and for said County and State, personally appeared  
Grace L. Stoen and Timothy Stoen known to me to be the  
person whose names are subscribed to the within instruments and acknow-  
ledged to me that they executed the same.

WITNESS MY HAND AND OFFICIAL SEAL.



*James R. Randolph*

BB-31-a-42



AFFIDAVIT OF GRACE L. STOEN

1. Authorizes her son John Stoen to travel "to the Promise Land" for any reason.
2. In her own handwriting

I give my full permission to have my son, John Victor Stoen go to the Promised Land for any reason.

Grace L. Stoen

BB-31-a-43

URGENT

P. O. Box 933  
San Francisco, Ca 94101

November 17, 1977

Rev. James Jones  
c/o Mrs. James Jones  
People's Temple  
1859 Geary Blvd.  
San Francisco, Calif.

Re: Return of John Victor Stoen

Dear Jim:

I am asking for your cooperation in delivering John Victor Stoen to Grace Stoen and me in San Francisco by next Friday noon, November 25, 1977. We will, of course, raise John in an interracial and sharing environment consistent with the highest teachings.

I have received reliable information to the effect that Grace is being seriously discredited in John's eyes. Not only is this deeply offensive to me, but it could easily cause irreparable, emotional harm to John. I ask you to immediately reverse the hate campaign and to advise John repeatedly what you and I both know to be true: That Grace loves him deeply and has never abandoned him. You and I both know, and John should be told, that Grace's leaving the People's Temple was not in any way due to a lack of commitment to the goals of racial equality, economic fairness and social justice.

As a further indication of cooperation, please indicate to Grace's attorney, Jeffrey A. Haas, by telegram not later than Tuesday noon, November 22, 1977, the exact time and flight of John Victor's arrival at San Francisco International Airport. The telegram should be sent to Mr. Haas at 3609 Sacramento St., San Francisco, California 94118. (Telephone: 922-6200)

I am sending a telegram to Clarence Hughes and Lionel Luckhoo in Guyana asking them to be of assistance to you in returning John Victor to us. You may confirm that I am the authentic author of this letter by contacting my attorney, Patrick Hallinan. (Telephone: 861-1151) I know that Marceline Jones and your attorney,

BB- 31-a-44

Charles Garry, will be able to convey the verbatim text of this letter to you by telephone and short wave radio immediately.

May the goals we shared be realized at Jonestown.

Very truly yours,

*Timothy O. Stoen*

Timothy O. Stoen

cc: Charles Garry, Attorney at Law

BB-31-a-45

**LUCKHOO & LUCKHOO**  
**LEGAL PRACTITIONERS**

EVELYN A. LUCKHOO  
COMMISSIONER OF OATHS AND NOTARY PUBLIC  
SOLICITOR  
WITH  
SIR LIONEL A. LUCKHOO K.C.M.G. C.B.E. S.C.  
BARRISTER-AT-LAW  
C. LLOYD LUCKHOO S.C.  
BARRISTER-AT-LAW  
EDWARD A. LUCKHOO LL.B.  
BARRISTER-AT-LAW  
KEITH R. L. LUCKHOO LL.B.  
BARRISTER-AT-LAW

DIAL 65816

CHAMBERS:

"WHITEHALL"

N ½ LOT 1 CROAL STREET

(P.O. BOX 163),

GEORGETOWN,

GUYANA,

SOUTH AMERICA.

2nd November, 1977

Dear Charles,

I am deeply honoured by your biography<sup>get</sup> and the generous inscription therein which I have just received. I shall write to you after I have read and digested the same.

I send herewith copies of the three publications of my stories which have been printed up to the present. Someone from abroad (Fred Archer) comes on the 13th of this month to spend a few weeks and to get material to do my biography which will be printed simultaneously in London and New York. I am happy about this because we live for a short while and it provides a feeling of satisfaction to know that one's efforts will be recorded for those of my family who will come in the distant future when I am pushing up daisies.

Just glancing through the pages of your book, you certainly have had an exciting life in which your tenacity and courage are strongly evidenced. Maybe one day I shall be privileged to see you in action and to hear you in person.

I hope our mutual client takes our advice if and when the occasion arises.

I have just concluded my 205th murder, but I fear I have some pending in which the chances of success are rather slim. I am advised to pick my cases, but somehow this approach does not appeal to me although I do confess that when I was in the 190s I exercised some discretion in the acceptance of briefs.

My daughter's comments on you were, "Daddy he seems to be a very real person," and she is looking forward to the reading of your biography.

I have had suggestions from abroad that I should do a lecture tour with some of the anecdotes and some of my criminal cases, and also the diplomatic

BB- 31-a-46 /2...

LUCKHOO & LUCKHOO  
LEGAL PRACTITIONERS

DATE 2nd November, 1977

period of my life when I represented two independent countries, Barbados and Guyana in Europe and the U.K. as Ambassador, but nothing has fructified.

Maybe one day I shall be invited into your part of the world to do the kind of talks I did in England, and then it would be my great pleasure to renew our acquaintance.

Warmest regards to you and your wife and with best wishes!

*Ever*

Yours,

*David*

BB- 31-a-47

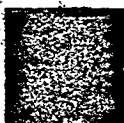
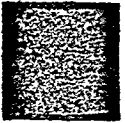
DIVERSION TO TIM STOEN.

--at little old lady and a custodian told us about something ~~ix~~ they heard. -- *this should imply the stuff be researched regarding Lester Kussling.*

DIVERSION TO THE OLIVERS.

--we will pay their expenses down here to visit and see everything for them selves. And anyone else they know in the conspiracy, <sup>who would be interested</sup> It won't cost them anything and they can see for themselves that it is not what they were told. JJ is trying to get your children to talk to you. Even tried to get them to go into town and they did not want to. ~~But I know~~ <sup>tried to explain to</sup> he has ~~told~~ <sup>you read</sup> them that the only thing you know is what ~~you~~ <sup>you</sup> read in the paper. ~~But~~ <sup>you read</sup> the Sun Reporter and the hearst paper, and KGO channel 7, telling our side of the story, and paraising us <sup>and other</sup> in many instances, papers throughout the nation. ~~He~~ <sup>They</sup> ~~said that he~~ would be open to ~~any idea~~ <sup>ideas</sup> ~~of~~ <sup>of</sup> reconciliation -- <sup>of fairness</sup> to be shown by you & respect for their ~~beloved~~ <sup>beloved</sup> friend.

83-3-15-28



**LUCKHOO & LUCKHOO**  
**LEGAL PRACTITIONERS**

EVELYN A. LUCKHOO  
COMMISSIONER OF OATHS AND NOTARY PUBLIC  
SOLICITOR  
WITH  
SIR LIONEL A. LUCKHOO K.C.M.G., C.B.E., S.C.  
BARRISTER-AT-LAW  
C. LLOYD LUCKHOO S.C.  
BARRISTER-AT-LAW  
EDWARD A. LUCKHOO LL.B.  
BARRISTER-AT-LAW  
KEITH R. L. LUCKHOO LL.B.  
BARRISTER-AT-LAW

DIAL 65816

CHAMBERS:

"WHITEHALL"

N ½ LOT 1 CROAL STREET

(P.O. BOX 163),

GEORGETOWN.

GUYANA.

SOUTH AMERICA.

7th December, 1977

Dear Paula,

Re: Application by Joyce Touchette for joinder and to remove  
Habeas Corpus Orders.

In my letter to you of 19th September, I pointed out "..... My services up to the present stage are freely given ....." I find that I have attended eight (8) times in Court for this matter and once again must do so on the 18th December, when a date will be fixed for the continuation. Reluctantly I am compelled to make a small charge for my services. I suggest the sum of \$2,500.00 (two thousand five hundred dollars).

All of the lawyers have, of course, been paid and there are no extra fees. We would all be present for the continuation.

In respect of general advice and even the opinion which I gave today re Criminal charge of kidnapping, there are no charges. I have had to fix a fee because of the long drawn-out hearings which are time consuming.

Warmest Regards!

Yours,

*David L.*

BB-31-a-49

OPINION:

Re: Kidnapping.

Kidnapping is an offence ~~at~~ <sup>and/</sup> Common Law punishable by a fine or imprisonment. We in Guyana follow the common law of England, and the stealing and carrying away of a person is an offence at English Common Law. To obtain a prima facie case the Prosecution will have to prove the imprisonment of the person, whether it be a common prison or a private dwelling house.

It is a good defence to show that the person was not imprisoned. Merely to withdraw consent given <sup>for</sup> the care of a person placed in lawful custody of another is not kidnapping.

The following cases are of use to show the limits of kidnapping:-

1. R. -v- Lesley 1 East P.C. 429.
2. R. -v- Nodder (C.C.A. April 12th, 1937).
3. Phillips -v- Lyre L.R. 4 Q.B. 240.

Clearly in the instant case there is no taking of the person against his will. There is no detention of the person against his will and there is no confinement of the person against his will. The requisites of kidnapping as understood by the Common Law of England are absent and consequently no case can properly be founded to institute proceedings.

*Dionee Stubbs*  
of Counsel  
7.12.77

-BB-31a-50



STRATEGY REGARDING THE CUSTODY ISSUE:

I. Lionel Luckhoo:

Joyce Touchette is to appear in court as personal secretary of Jim Jones. The Marshall of the Court claims to have served the papers on Sept. 9 by way of posting 3 copies on various buildings and the ~~fourth~~ fourth copy being served on the personal secretary of Jim Jones, who is Joyce Touchette.

Joyce is to come down and say, "Yes, I am the personal secretary of Jim Jones but I do not know where Jim Jones or the child is at this moment." "The papers were served on me thus giving me the right to intercede. I took the papers to counsel and he advised that all orders are wrong and of no effect, therefore, I move that the court throw the orders out for the following reasons:

1. There was no personal service on Bishop Jones.
2. Mother is not personally present.
3. There is no jurisdiction.

4. I, along with Jim Jones and other responsible persons were given full custody of the child. The mother, Grace Stoen, wrote in her own handwriting that she would never interfere with the child. (Luckhoo also mentioned something about affidavits sworn by Grace & lawyer have hidden and concealed from the court material facts (such as the powers of attorney, and other things which I didn't get down).

II. Chaikin recommended adding the following to the statements made by Joyce (and other elements for the course of strategy to follow):

1. The affidavits contain much inadmissible hearsay.
2. The court order from California was made ex-parte, neither Tim Stoen nor Jim Jones were present at the hearing; neither were served.
3. The affidavits totally ignore the best interests of the child and do not reach the issue of Grace Stoen's fitness as a parent.
4. Add about the healthy environment of the child (Jonestown) because the government has said it is a "model community." If found unfit by the Guyana court, it is a governmental statement that this interior settlement is an unfit place for settlers and especially the children to live. (Get affidavits about what a healthy environment it is, how good the educational and recreational facilities are for children, how it looks like a small town, and anything else you can think of). (Try to get Headmaster of P.K. school, Mrs. Carmichael, Rose Ifill, government and community leaders.)

BB-31-a-51

III. Miscellaneous Information:

1. Find a "Commissioner of Oaths" or a "Notary Public" in that area because the statements must be sworn to in person to avoid any question in the court. The lawyer will have to draft the affidavits which are to be court record however, I will have to consult Lionel about using the affidavits about Grace's character which were made by many of our people.
2. Lionel said that he had a long talk with the Chancellor of the Judiciary who is the very top person in the court system other than the minister of justice. He said that we should not allow Haas or anyone connected with Haas <sup>except a Marshall of the Court</sup> on our property and Lionel said that we should throw them off if they come on. The Chancellor said that there will be no Marshall coming. Lio repeated this several times and said that he knew this for a fact that there will not be a Marshall coming onto the property, and in fact, the one person in the court system who is dead against us is going to be removed (his name is Burch-Smith). He is the person to make a court order effective and there was some concern earlier that if he were offered enough that he might go against the Minister of Justice's orders, however Lio was certain tonight when he called that there was nothing to worry about anymore, that the man was being transferred.
3. Lio said that by using Joyce as the persons served with the ~~XXXXXX~~ papers, that on the legal level with no governmental intervention, Jim and John would not have to come out of the bush.
4. Clarke said that the Judge who made the bad orders was somewhat hostile toward us because he had heard that one of our members had called him stupid. He obviously wanted to believe it because it had to have come from someone connected with Haas.
5. Lio wanted to have a good legal case as a contingency, however, he said to not tell Fred Wills how far we had gone within the legal framework so that the government will still feel pressure to do their part of intervening on our behalf. Wills said that Jim and John would not have to come out of the bush also, and we will find out on Saturday. (Wills said that he does not want to discuss anything until the weekend. I called on Thurs. and he reiterated that he didn't ~~want~~ want to discuss it until the weekend.)
6. Rex McKay wants his retainer in U.S. \$. He wants U.S.\$1,500.
7. Lio is not going out of the country after all therefore, he feels no urgency for Joyce to come in until her is ready for her.
8. I don't think we should discuss this strategy at all over the radio because Hughes quoted several conversations to Lio that we had with you. It jeopardize our chances in court if we discuss this.

BB-31-a-52

LUCKHOO & LUCKHOO  
LEGAL PRACTITIONERS

EVELYN A. LUCKHOO  
COMMISSIONER OF BATHS AND NOTARY PUBLIC  
SOLICITOR  
(HON. CONSUL FOR SWEDEN) (PHONE 62616)

WITH  
SIR LIONEL A. LUCKHOO K.C.M.G., C.B.E., S.C. (PHONE 62511)  
BARRISTER-AT-LAW  
C. LLOYD LUCKHOO S.C. (PHONE 62570)  
BARRISTER-AT-LAW  
EDWARD A. LUCKHOO LL.B. (PHONE 62616)  
BARRISTER-AT-LAW  
KEITH R. L. LUCKHOO LL.B. (PHONE 62511)  
BARRISTER-AT-LAW  
JANE SAVAGE-LUCKHOO (PHONE 62511)  
BARRISTER-AT-LAW

CHAMBERS:

"WHITE HALL"

Nº LOT 1 CROAL STREET  
(P.O. BOX 163).

GEORGETOWN.

GUYANA.

SOUTH AMERICA.

19<sup>th</sup> September 1977

Dear Paula,

Re Summons - Jorder - Setting aside Orders

I have just had a Conference with my brother Lloyd (a Senior Counsel), Junior Counsel + McDoom Co. (Solicitors).

We have settled the Affidavit. The Summons is now being prepared.

The other lawyers discussed with me fees. Up to now the only fees incurred are those for Solicitor's preliminary work, investigation and disbursements.

My services up to the present stage are freely given indeed happily given. When all is finished at the end of the line, I may send in some small charge.

I told the lawyers to fix a fee inclusive of all disbursements, and including the Solicitor's charges which are incurred ..... A fee of \$8,500.00 has been fixed, and if you are agreeable and pay in this amount to Luckhoo & Luckhoo then we would have the firm issue their cheques

Normally we just send in accounts - but I couldn't do that to you, hence I have sought to spell it out.

U  
Uniel

Conversation between Lionel L.uckhoo and Karen  
October 1, 1977

Court went all day. He will finish tomorrow.  
Bishop (Judge Bishop) is taking the case quite well.  
Lloyd also spoke to Judge Bishop and gave his presentation, as did,  
Edward, who is Lionel's nephew.

Bishop (Judge) has already ordered the charges against JJ dropped, as he  
admitted they were wrong.

Conversation between Lionel & KL on October 2, 1977

He said they concluded the orders made by the judge affecting the child.  
After a number of days of arguments and authorities, Hughes will commence his  
reply on Monday. The judge seemed very favorably inclined when Lionel said  
he pointed out that a chain was as strong as its weakest link, and that a chain  
for the creation of the writ of habeous corpus had tissue thin links which  
broke under scrutiny.

Points made:

- 1) Abdication (sp?) can only be made under the law by the mother, father or  
guardian and this was not done.
- 2) One of them would have to swear to show the child was unlawfully detained.
- 3) There is no affidavit in court by Grace Stoen.
- 4) Judge Bishop has agreed with us that Grace has not made an affidavit because  
it had to do with the matrimonial situation between her and Tim, and was not  
revelant to the present situation with John.
- 5) The affidavit by Haas transgressed all laws of affidavits in that he repeated  
heresays without giving the source of the information, and he said that he  
believed it
- 6) Haas was dishonest in court. There were features that should have been  
brought to the court's attention, such as Grace Stoen having come to  
Guyana, John having been here off and on for 3 years,  
and the fact that the custody papers were in the hands of Mrs. Touchette.
- 7) Lionel said they also attacked the service of events which he said must be  
personal.
- 8) The return of service was bad by Haas in that he swore that JJ could not  
be found. He would have to show what efforts had been made to find JJ.

Lionel cited a large number of authorities from the United Kingdom and the  
Dominions and elsewhere which all confirmed the points he made.

Lionel feels that Hughes is conscious of the weakness of his position and it  
would not surprise me if they were to capitulate at a later stage.  
Lionel feels what they are about is to have it drag on till Oct. 6, and  
then get the courts in the US to move for contempt against JJ to get an order  
for his arrest in the US. That order would have no effect in Guyana but  
it seems to Lionel that TOS should resist the actions being brought by his  
wife and he could ask for the adjournment of the case by citing the unfit-  
ness of Grace.

Since JJ has received no papers, Charles Garry could state it's not possible  
to reach him.

BB- 31-a-54

STATEMENT OF IN RE CUSTODY OF JOHN VICTOR STOEN

To Whom It May Concern:

I, Timothy G. Stoen, declare and certify as follows:

I am the legal father of John Victor Stoen, a minor of the age

of 5 years, born 25 January 1977. The legal mother of said minor is

Grace ~~Stoen~~ Stoen. The purpose of this statement is to show <sup>why</sup> ~~that~~ Grace

Stoen is unfit to be awarded the custody of said minor. <sup>to show to the government of Guyana</sup> ~~to show to the government of Guyana~~ <sup>that she is a dangerous reactionary who has indicated she would work with the Central Intelligence Agency to do things</sup> ~~that she is a dangerous reactionary who has indicated she would work with the Central Intelligence Agency to do things~~ <sup>to show to the government of Guyana</sup> ~~to show to the government of Guyana~~ <sup>in July 1976</sup> ~~in July 1976~~ Grace Stoen abandoned said minor and ran off with <sup>of dark short black hair and light skin</sup> ~~of dark short black hair and light skin~~ another man. <sup>To me and others</sup> ~~To me and others~~ She indicated before she left that she wanted said minor

in Jonestown, Northwest District, Guyana, South America to live ~~under~~ under the pastoral care of Rev. James W. Jones. ~~She left the~~

The man Grace Stoen ran off with <sup>is a reactionary / who by word and deed</sup> ~~is a reactionary / who by word and deed~~ is totally opposed to Socialism. Grace Stoen has herself become a reactionary.

<sup>After</sup> ~~After~~ leaving, she <sup>has indicated</sup> ~~has indicated~~ that she would work for the CIA <sup>to the CIA</sup> ~~to the CIA~~ to me that she would use a capitalist who didn't want to share, and would work with the U.S. Central Intelligence Agency. <sup>"to make things rough" for</sup> ~~"to make things rough" for~~ In September 1976 Grace Stoen reaffirmed to me and others her

desire that said minor live in Guyana under the care of Pastor Jones.

Said minor was brought to come to live in Guyana in September 1976,

where he has remained ever since. Grace Stoen was given a round

trip air ticket to visit her said minor in Guyana.

BB-31-a-55

TO WHOM IT MAY CONCERN

I, Timothy Oliver Stoen, hereby acknowledge that in April, 1971, I entreated my beloved pastor, James W. Jones, to sire a child by my wife, Grace Lucy (Grech) Stoen, who had previously, at my insistence, reluctantly but graciously consented thereto. James W. Jones agreed to do so, reluctantly, after I explained that I very much wished to raise a child, but was unable, after extensive attempts, to sire one myself. My reason for requesting James W. Jones to do this is that I wanted my child to be fathered, if not by me, by the most compassionate, honest, and courageous human being the world contains.

The child, John Victor Stoen, was born on January 25, 1972. I am privileged beyond words to have the responsibility for caring for him, and I undertake this task humbly with the steadfast hope that said child will become a devoted follower of Jesus Christ and be instrumental in bringing God's kingdom here on earth, as has been his wonderful natural father.

I declare under penalty of perjury that the foregoing is true and correct.

Timothy Oliver Stoen  
Timothy Oliver Stoen  
Post Office Box 126  
Ukiah, California 95482

Dated: February 6, 1972

Witnessed: Marceline M. Jones

BB-31-a-56

SUBJECT: ATTEMPTED WRIT SERVICE

Haas & Marshall came again today

asked for B - to is not here

We do accept service as per the advice of our attorney we not acknowledging service not authorized to accept Marshall read papers

- they mailed 3 copies to our building
- someone tore down & threw on their car

The order reads:

The writ of Habeas Corpus served on 11/19/7

by affixing 3 copies of the order to 3 dif places on the gate or other bldg constituting the agri mission

that a 4th copy be served on the personal secretary or a member of staff c/in the compound holding himself or herself out as the serviced or agent of the said ag. 60-31-a-57

He appear & child Sat 9a.m. If he does not, the court will

**LUCKHOO & LUCKHOO**  
LEGAL PRACTITIONERS

EVELYN A. LUCKHOO  
COMMISSIONER OF OATHS AND NOTARY PUBLIC  
SOLICITOR  
(HON. CONSUL FOR SWEDEN) (PHONE 62818)

WITH  
SIR LIONEL A. LUCKHOO K.C.M.G., C.B.E., S.C. (PHONE 62811)  
BARRISTER-AT-LAW

C. LLOYD LUCKHOO S.C. (PHONE 62370)  
BARRISTER-AT-LAW

EDWARD A. LUCKHOO LL.B. (PHONE 62818)  
BARRISTER-AT-LAW

KEITH R. L. LUCKHOO LL.B. (PHONE 62811)  
BARRISTER-AT-LAW

JANE SAVIGE-LUCKHOO (PHONE 62811)  
BARRISTER-AT-LAW

CHAMBERS:

"WHITEHALL"

N<sup>o</sup> 1 LOT 1 CROAL STREET  
(P.O. BOX 163).

GEORGETOWN.

GUYANA.

SOUTH AMERICA.

9. 9. 77

Paula

This is a cutting from a highly  
reputable English Newspaper

The Observer

dated Sunday 4<sup>th</sup> Sept 1977

I feel that unless something is  
done by means of initiating action  
against such newspapers .... the  
Bishop will be seriously prejudiced  
in the eyes of the public.

Already a number of persons have  
been saying that the news about  
Jim Jones is not good & has  
he taken steps to stop this  
defamation? You should let Gary  
know.

L. BB-31-a-58





Politicians once glad to appear in public with the Rev. Jim Jones (centre) include San Francisco's mayor George Moscone (left) and the Lieutenant-Governor of California, Mervyn Dymally.

# 'Prophet' exit shocks California

from CHARLES FOLEY in San Francisco

MOVING out by night in small groups, nearly 1,000 people of all ages have left the American West on a 6,000-mile trek by bus, car and plane for a jungle sanctuary in the former British colony of Guyana.

They acted under secret orders from the Rev. Jim Jones, 45, a new 'prophet of God' who predicts a fascist takeover of America to be fol-

lowed by a nuclear holocaust.

Last week, when Jones was found to have joined the migration himself, thousands of the faithful in coastal cities from Los Angeles to Vancouver mourned the loss of their leader—not to mention Church funds totalling millions pounds.

Shock waves are also running through the California Establishments, especially among politicians, bankers and businessmen who courted Jones's favour, praised his good works and benefited from his formidable political clout.

The pudgily handsome Jones, who arrived from an obscure mid-West mission 12 years ago, is no backwoods preacher but a prominent local figure—foreman of a San Francisco grand jury and chairman of the Housing Commission, with aides who have to obtain well-paid public posts.

California's Governor Jerry Brown, the mayors of Los Angeles and San Francisco, police chiefs and district attorneys attended his temple meetings. Vice-President Walter Mondale invited him to his chartered jet for a private talk. Mrs Rosalynn Carter, the First Lady, spoke alongside Jones on an election tour before a hall filled with his cheering admirers.

On San Francisco's Geary Street, the Jones HQ is locked and barred. His 'people's temples' in Los Angeles and Redwood City are up for sale. So are juvenile care centres, blocks of flats and houses assigned to the Church by those who joined the exodus.

Now, some of the HQ staff feel free to break their silence on Church affairs, and I have also talked to a handful of deserters back from Guyana. Their stories suggest that the man who ruled their lives had little in common with the genial Jones who sat with the elite at city banquets.

Behind his temple doors,

before a mainly black congregation, Jones, who is white, claimed to be an amalgam of Christ resurrected and a 'reborn Lenin'. He claimed to have cured cancer and the palsy and to have resurrected the dead—including himself. During one dramatic ceremony it appeared he had been shot by a hidden assassin. He was carried away covered in blood, only to walk back all smiles, wearing a fresh, spotless shirt. The crowd went wild.

Later came the prophecies. Jones had visions of race driven into the gas ovens and wars in which blacks were the Western world was destroyed in a nuclear conflict. Only blind obedience could save his followers. Money was needed to carve out a Caribbean 'paradise' in South America. Those who did not give would perish.

## Denunciations

Members were urged to denounce each other at 'cathartic sessions' which lasted until dawn. Transgressors faced the 'board of education'—a wooden paddle wielded by a muscular disciple. Nurses stood by to treat the injured.

One girl, Linda Mertle, 16, said she could not sit down for 10 days after being beaten—but still managed to utter the ritual 'thank you father'. Her parents told me they are suing Jones for \$1 million (about £300,000) for the alleged injury to their daughter. They are also seeking the return of property handed to the temple.

Mainly poor, often elderly, the members gave between a quarter and half of their income to the treasury. Many handed over jewellery, furs, silver, even their homes and life insurance.

Relieved of these worldly goods, they gathered in seedy communes, exchanging their acetate cheques for £1 a

week pocket money. Some rattled bezzing boxes or sold pictures of Jones on Street corners. Others worked a 16-hour day baking or making quilts and bedspreads to be sold for the cause. VIP visits to the temples were skillfully stage-managed. Church members were put on show as rescued junkies and criminals.

The congregations were used to build up Jones's political power base. They voted a black ring doorbells, delivered leaflets, packed public meetings and signed letters by the thousand for write-in campaigns. In some close election battles, they backed candidates who knew better than to refuse the help of the man called 'Emperor Jones.'

Three years ago, Jones flew to Guyana on a prospecting trip. Dan Phillips, one of a dozen trustees on the plane, said each of them carried £30,000 in cash, and Jones deposited a £330,000 cheque in Barclays Bank, Georgetown.

The Rev. chose Guyana because the blacks there are English-speaking Christians and could be proselytised. He acquired several thousand acres of jungle to build 'Jonestown' and buried money there, said Phillips.

None of this board has reached the men, women and children now working from dawn to dusk to clear land for crops. The few who have returned say 'cathartic sessions' have been intensified. Slackers have their heads shaved or are denied food.

A list of 'missing persons' is expected to include scores of young delinquents entrusted in temple homes. Short-wave broadcasts from 'Jonestown' claim they are being given a new start in a world free from big city perils.

At an aide's apartment on Nob Hill, San Francisco, I listened to a crackling message. Some of it seemed to be in code. But Jones's voice warmed his staff against 'conspirators' and urging the receipt of further funds, came clearly through.

6A-31-a-59

Edith Moller  
Jonestown, S.A.

Dearest Edith;

I have been thinking fondly of you over these past several months since we've seen each other. I can say with utter sincerity that you have been the warmest, most satisfying companion to me in my loneliest hours that a human being could have possibly been. I long to see your cheerful face, and to hear your understanding voice in my ear again. It would be so good, Edith, just to touch your hand once more. I hope you can see past the differences that separate us now, and perhaps know that what I have felt for you, and am feeling now, is undiluted love. Just pure and simple love. Please, please don't let circumstances of the present cloud your vision of what we had, and could have, if you were here with me now.

I could never have worked out my life as I must live it there at the Project in Guyana, Edith. First, my esteem; even adoration, of Comrade Cheddi Jagan was looked on with embarrassment and disapproval by Jim, who would not even tolerate my objectively discussing the merits of that great man with members of the Temple. I found this restrictiveness intolerable, both morally and practically. If Jim chooses to work with Burnham and his party, that is his business, he has no right refusing another side to be discussed among intelligent people. I personally disdain Burnham, and feel that he has cheapened the accomplishments of the People and their revolution. It takes guts to be the minority opposition in Guyana, and that's what people like Jim Jones and Forbes Burnham don't give enough credit to!

But one thing that I beg of you now, Edith. Do Not let your commitment to high principles (and I know that yours are the highest always,) delude you into thinking

that we cannot love one another as we have before, and at the same time serve those principles to the fullest. High ideals and great principles make people better able to love, Edith, and you and I can be happier than those uncommitted ones who have not developed their capacity to love by serving the greater cause of socialism. If you stay there in Jonestown, Edith, you will learn much of how to serve Jonestown, but you will lose sight of the greater movement now taking shape in America. This is where the real revolution is growing; at the root of the system. There, you are just fighting the peripheral skirmishes, while the actual struggle goes on in America.

I know you have given your all to the cause you believe in. That's just the kind of person you are, and I love you the more for it. I hold these qualities in you like pearls of great value. Unprincipled people like Forbes Burnham can keep their own private funds in Swiss bank accounts, and never feel a pang of remorse for their dishonesty. Not so with you, my love, for I know that you agonize over the minutest details of your life, to make sure that you are living in accord with the integrity to which you have committed your life.

I hope with all my heart you will forgive what may seem to you now like an inconsistency, but believe me when I say that I did it for love. Love I knew you and I could share when the time and opportunity presented itself.

That time is now, Edith. Please, I implore you, reach out and take it. Do not send my love back void, for this would break my heart, more than you could ever know.

Loving you with my whole heart,

*Jim*

Timothy Oliver Stoen

BB-31-a-60

BB-31-a-61

28 May 1978

To: Dad  
From: Edith Roller *Edith Roller*  
Subject: Proposal re Class Enemy #1 - Tim Stoen

In view of your remarks last night concerning the harm done to our family by this individual, I want to reiterate my offer to take care of him, with a few additional details. What I plan is to follow through on the basis of the letter he wrote to me, pretend I am browned off with communal living and miss him terribly, that as I am not much use to the present concerns of Jonestown, I can find a way to return, and shall look forward to seeing him. When I got to the States, I would proceed on that basis, presuming that, as I suspect, he hasn't got a real friend in the world, nor anyone who cares about him. It always seemed strange to me, but I do seem to have some sexual attractiveness to him. I may add that the pleasure was one-sided, because I got no fun out of it at all, except, as I thought then, that I was giving some relaxation to a person who was serving the cause well. Now I would be serving the cause.

I would go ahead on the basis I could become intimate with him and induce him at least to share a cup of tea or coffee with me, if not liquor, into which at an opportune time I could slip some quick-acting poison. If the circumstances were such that it would be better for me not to live, I could take it too. I imagine such a poison could be obtained, say from a garden supply store — a pesticide of some sort. A pesticide would be appropriate.

As far as conspiracy charges against the church because I could not have done this without the help of the organization, I don't see that one more charge could make a difference, what with war threatening. Before such charges could be tried, it would be all over. I think it wise that I should go out as a person who didn't fit in here. If an attempt were made to force me to do harm to the church, I don't see how this could be effective. In the first place, I don't believe I know any secrets not already known to them. In the second place, by my association with Tim Stoen, I would be joining the conspiracy — for a while. If they tried me on any charge, including murder, I wouldn't worry. I don't mind going to jail. I know the CIA. If torture was threatened, I would commit suicide.

I further propose that during the time it takes to put this plan into action — I imagine the conspirators would test me for sincerity — I go to Bechtel's and get my old job back or a similar one. Believe it or not, I feel sure that People's Temple and all the publicity about it has scarcely made a ripple at that insulated institution. But if they have anything to say, I can get a job somewhere else. The advantage of going to Bechtel's is, not only that I had worked up to a pretty good salary, but I am familiar with the contracts they have in such countries as Brazil, Venezuela, Nigeria and Algeria — where I know they have operations. This information might come in handy, as I wrote yesterday, because it could give access to electrical power plants where nuclear material could be obtained by guerrilla action. In case of nuclear war wiping out their top leadership in the States, a resultant gap in organization might offer a wedge for revolutionary activity in those countries and others where Bechtel is operating.

I have for some time felt a guilt because I did not stay longer in the States and contribute my considerable salary for a longer period of time — I just had to get over to Jonestown. I was making around \$10,000 a year. If I could kill two birds with one stone, I would feel it my duty to do so.

Ever since I joined the Temple, I have actually been somewhat convinced that I must have been in the CIA for some reason. My intelligence knowledge may perhaps be put to use. If, however, this just represents some Edgar Allan Poe dreams of glory,

80-31-2-62

I may be able to get the money for my fare home from my family. They didn't particularly want me to come here, and most people love saying, "I told you so."

Just ignore it.

I Frances R. Muchnick, declare under penalty of perjury that the following is true and correct:

On Sunday, the 7th of May, 1978 around 7:30 p.m., I received the following phone call from a Mr. Timothy Stoen:

TS - Mrs. Frances Muchnick? I don't know whether you remember me or not, but I met you some years ago at the People's Temple Church in Redwood Valley, and I'm calling to let you know of a mass Protest Meeting to be held in front of the Federal Building in San Francisco on Wednesday, May 10th.

FM - What kind of meeting?

TS - We are a group of 25 parents who have children or relatives in the Agricultural Mission in Guyana, and they are being held there incommunicado. There is no way we can reach them by phone or radio or get to see them. Five parents have traveled to Guyana and came back without seeing their children. I understand that your children and grandchildren are there also.

FM - Yes, my grandchildren are there, and my son-in-law is there, but my daughter Claire is still here in Redwood Valley. By the way, how did you ever get my number to call me?

TS - Oh, I didn't know that Claire was still in Redwood Valley, - I got your number from Mr & Mrs Janaro, at 763-4119, and they asked me to call you. They wanted you to know what was going on.

FM - Did you know my Claire and Richard?

TS - Oh yes, very well. I was as dedicated a worker for the Temple as they are, five years ago. But then I began thinking that things were not going exactly as I had contemplated they would, because the more power that Jim Jones possessed, the more he wanted to use. I tried to break away from the church two times - I went as far as London to get away from it all, and try to think things out clearly for myself - but Jim sent someone after me and begged me to come back. I decided to give it another try. For some reason, I was told to sign a paper saying that Jim was the father of my child (TS didn't say what the reason was), and now I want my child back. I have a suit going in the Guanese courts.

FM - Have you ever been to Guyana?

TS - Yes, I spent about 3 months there.

FM - What did you find there?

TS - It was a very beautiful spot - and good food - a little starchy, but good. When I was there, there were only about 75 people there, and now there are about a 1000. So I don't really know what the conditions are there now.

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- FM - I understand that Jonestown is in a remote region and difficult to get to.
- TS - The difficulty was in getting out of there, once you get in - Now, no one can leave. The mail is definitely censored in Jonestown. I know that first hand.
- FM - If the people in Jonestown are being held captive or against their will, how come you don't go to the government for help in getting them released?
- TS - Oh, I did. I spent two weeks in Washington, trying to get through some of the buracracy there - trying to get people to listen to me. I spoke to (or THEY, meaning the group) Prime Minister Burnham about investigating Jonestown.
- FM - Do you know Lt. Governor Dymally?
- TS - Very well. In fact, he was on the plane with me when I went to Guyana.
- FM - Well, it is my understanding that Lt. Gov. Dymally was very favorably impressed with what he found there, and came back full of enthusiasm with the progress and the life style program that they are accomplishing in Jonestown.
- TS - He was very impressed at that time, but we have been talking to him and he is weakening in his opinion of Jonestown since we have been informing him and putting on some pressure. Jim Jones is a master at mind control, is power mad, it has gone to his head, - is paranoid and can't take criticism of any kind. Claire and Richard are completely under the influence of Jim, are very loyal to him and would do anything he asked - Claire would even kill someone if he asked her to.
- FM - I have complete confidence in the intelligence of Claire and Richard and their ability to judge what is right for them and their children!
- TS - People are afraid to come forth and expose Jim and the Jonestown situation for fear of retaliation by Jim or his henchmen - several people were threatened that their homes would be burned, - but when they came forth - nothing really happened to them or their homes.
- FM - Have you ever witnessed any physical violence against members of the church, or anyone who tried to leave the church?
- TS - When I was a member I saw, (I think he said Jim) paddle people as punishment.
- TS - I just wanted to let you know what we are trying to do. We are asking Jim to please let our children come back here for one week (at our expense) so that we can see them again, and let them decide for themselves whether they want to return to Jonestown or not. If they decide that they want to return to Jonestown, we will send them back.
- FM - Well, that sounds like a fair enough request.

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TS - Also want to let you know that Jim wrote letters to all of our Senators and Congressmen, saying that he would rather die than be harassed from continent to continent. Jim has strayed so far from the original concept of a better world to live in, - is so inflated by his power, that if things don't go Jim's way, Jim could get his followers to partake in a mass suicide action if he so decreed.

TS - If you want to reach me for any reason, or any further information as to the progress of the group, feel free to call me at my law office in San Francisco, on Montgomery Street. The number is 391-5020.

FM - Are you calling me from Los Angeles.

TS - No, I'm calling from San Francisco

FM - This really is a long toll call. I want to thank you for calling me and telling me about your group, but I still have all the confidence in the world in the judgement of Claire and Richard.

The above pieces of conversation may be out of sequence, but considering the emotional duress I was going through hearing all of these things, and knowing that they are out to destroy this miraculous achievement by a group of valiant and courageous people under the leadership of a man they dearly love and respect, Jim Jones, - the above is as near as I can recollect - it may not be verbatim, but it is to the best of my knowledge and memory.

Executed on May 8th, 1978 at Los Angeles, California.

  
FRANCES R. MUCHNICK

BB-31-a-65

TO HARRIET:

The following is information from Terri's notes which is probably nowhere in the documents but might be relevant and you can decide what would be helpful to the counselor.

Also, this whole file is all we have here in Guyana on Tim & Grace so it should be copied. Also, as you can see the Mazor file is included. We asked the States for more copies of this but just be sure we do have one available and that we have copies of this file or at least of the important parts of it such as the affidavits so that we can use the information wherever necessary.

Grace Stoen's lawyer has told Gary that the San Francisco DA offered her immunity if she will testify before the grand jury. We do not know if they are going to do this (since obviously there is nothing to talk about.)

Tim Stoen is to their knowledge back home going to his brothers in France on his farm there.

I don't know if Tim Stoen's current libel suits against the media would be relevant in this case, but details on that would have to be gotten from Gary I would imagine.

Harriet: we began to be thinking more and more about the conspiracy end of this and the funding as you also have. Hill is beginning to fit together some of the peices. We wonder if the agencies involved are just outright funding her to get the return of the child, which will be an exchange for her later testimony and immunity. How else would she be able to get the attorneys? You may already have more ideas from that end. It seems like it could be a low-level treas. attempt to get information, but maybe they think she knows more than she does, or they just plan for her to outright lie. If the latter is the case, then I would think it might be more than low level. However, I beleive Hill wants all conerned here to know of it as low-level.

I and some others were somewhat paranoid of the coincidental arrival of some others you know of at the exact same time. I hope it is just that. It seems hard to believe otherwise, but I am getting pretty skeptical at this point.

someone is assigned to John at all times, but easier said than done.

BB- 31-a-66

Name, Address and Telephone Number of Attorney(s)

Space Below for Use of Court Clerk Only

JEFFREY A. HAAS  
MARGARET RYAN  
Attorneys at Law  
3609 Sacramento Street  
San Francisco, CA 94118  
922-6200

Attorney(s) for.....Petitioner.....

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

CASE NUMBER 719-147

Petitioner: GRACE LUCY STOEN

ORDER TO SHOW CAUSE (MARRIAGE)\*

and

Respondent: TIMOTHY O. STOEN

TO: PEOPLE'S TEMPLE

(Petitioner/Respondent/Other [Specify] AND Name)

You are ordered to appear in this court,

located at .....

(Street address and city)

on..... at .....m., Department or Room No....., to give any legal reason why certain  
(Date) (Time)

orders requested by..... should not be made  
(Petitioner/Respondent AND Name)

by this court as set forth in the attached REQUEST FOR ORDER AND DECLARATION, to which is attached:

Pending a hearing in this matter, the court further orders:

Petitioner is granted sole physical custody of JOHN VICTOR STOEN, Date of birth January 25, 1972, age 5 years. The PEOPLE'S TEMPLE and its agents and members are ordered to release JOHN VICTOR STOEN to Petitioner or her duly authorized agent.

Dated.....

Judge of the Superior Court

\*Indicate nature of orders requested and, if modification, so indicate by inserting "RE MODIFICATION."

Form Adopted by Rule 1285.10 of  
Judicial Council of California  
Effective January 1, 1972

ORDER TO SHOW CAUSE (MARRIAGE)  
CALIFORNIA NEWSPAPER SERVICE BUREAU, INC.

BB-31-a-67



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Attorney at Law  
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San Francisco, CA 94118  
3 (415) 922-6200  
4 MARGARET RYAN  
Attorney at Law  
5 294 Page Street  
San Francisco, CA 94102  
6 (415) 626-0979  
7 Attorneys for Petitioner

8  
9 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
10 IN THE CITY AND COUNTY OF SAN FRANCISCO  
11

12 In re the marriage of ) No. 719-147  
13 Petitioner: GRACE LUCY STOEN ) DECLARATION OF GRACE STOEN  
14 and )  
15 Respondent: TIMOTHY O. STOEN )  
16

17 I am informed and believe that my minor son, JOHN VICTOR  
18 STOEN, date of birth January 25, 1972, age 5 is in the physical  
19 custody of the Peoples' Temple, Inc. of San Francisco, Calif-  
20 ornia; that the Peoples' Temple has taken John to the Peoples'  
21 Temple Agricultural Mission in Guyana and that they will refuse  
22 to return him to me or to bring him within the jurisdiction of  
23 this court unless ordered to do so. I further believe that un-  
24 less this court acts, John will continue to be held in an at-  
25 mosphere that is detrimental to his mental and emotional well  
26 being and that he will be permanently deprived of the loving

Bo-31-a-68

1 and stable home I can provide for him.

2 I am a former member of the Peoples' Temple. I joined  
3 the organization shortly after my marriage to Respondent in  
4 1970. At the time of the marriage, I was nineteen years old,  
5 impressionable and looked to my husband, who was 12 years older  
6 for guidance. Respondent was a Deputy District Attorney for  
7 Mendocino County. He is intelligent and widely read. I greatly  
8 respected his judgment. He was a member of the Temple; I soon  
9 became a member also. The organization's professed ideals of  
10 social justice, racial equality and concern for the economically  
11 disadvantaged held great appeal for both of us.

12 I was given the position of bookkeeper and became inti-  
13 mately involved with the inner workings of the organization. I  
14 was instructed to become a notary public in order to assist in  
15 the deeding of large amounts of real property to the Temple by  
16 its members.

17 It soon became apparent to me that the organization and  
18 the lives of its members were tightly controlled by the Reveren  
19 Jim Jones, the founder. The Temple's Planning Commission  
20 created an illusion of collective decision-making. The Commis-  
21 sion made major decisions affecting the lives of the members.  
22 It decided where members would live, with whom their children  
23 would live, the career they would pursue and what they were to  
24 do with their earnings and property. The Planning Commission  
25 selected members out for punishment and public humiliation.  
26 Public humiliation and the threat of it caused members to beco

*direct*

*James Jones*

*John Jones*

1 passive in the face of demands made by the Temple. The Planning  
2 Commission was in fact the alter-ego of Rev. Jim Jones. Members  
3 felt a general loss of autonomy.

4 I worked in close association with Rev. Jim Jones. His be-  
5 havior was frequently erratic. Rev. Jones often expressed a  
6 paranoid world vision wherein he and his organization were the  
7 objective of multiple conspiracies. To protect himself from  
8 alleged threat of assassination, he employed bodyguards. He  
9 feared attack from within the Temple as well as from without.  
10 To protect himself from internal threat, members were frequently  
11 directed to sign statements declaring their predisposition to  
12 one aberrant form of anti-social behavior or another. I was  
13 required to sign such a statement. These statements were re-  
14 garded as an internal security measure. There was no suggestion  
15 that they were truthful. The statements were intended to be  
16 used to discredit anyone who turned against the church.

17 My own life was strictly regulated by the Temple. My  
18 minor son was sent to live with other Temple members. The  
19 children of other Temple were in turn sent to live with me.  
20 Though undermining the nuclear family was not a stated aim of  
21 the church, such was frequently the effect of the Temple's  
22 directives. The heavy schedule of church duties to which I  
23 was assigned often left me no more than 5 to 6 hours sleep  
24 per night. Nevertheless, because of the strong love I felt for  
25 my son, I was able to maintain close contact with John, generally  
26 seeing him at least four times a week. We enjoyed a warm and

BB-31-a-70

1 affectionate relationship.

2 The Peoples' Temple gradually took control of my life. The  
3 regulation and regimentation of our lives caused Respondent and  
4 myself to grow apart. Leaving the Temple seemed impossible.  
5 Members were strongly discouraged from leaving. Any defection  
6 from the ranks was seen as a threat to the security of the  
7 organization. Rumors circulated about dire consequences which  
8 would befall defectors. Because of my intimate knowledge of  
9 the organization's financing, my departure would be viewed as  
10 especially threatening.

11 Toward the end of my time as bookkeeper, the Temple's  
12 finances came under scrutiny. Allegations that transfers of  
13 money had been fraudulently induced began to be heard. Paranoia  
14 within the organization increased.

15 Thoroughly disillusioned with the organization I secretly  
16 departed in July, 1976. Since leaving the organization in July  
17 of 1976, I have made numerous attempts, first acting alone, and  
18 then with the aid of my attorney to secure my son's return  
19 through informal negotiations with Respondent and the Peoples'  
20 Temple.

21 I did not seek a court order because I feared that the  
22 Temple would secret the boy in Guyana and deny knowledge of his  
23 whereabouts. My last meeting with Respondent confirmed that  
24 our minor son was in Guyana with the Temple. Respondent indi-  
25 cated that he believed that custody should be split between  
26 the Temple and myself. He further stated that he would make

1 all reasonable efforts to have John sent back to live with me  
2 for six months, and that if negotiations with the church failed,  
3 he would travel to Guyana to institute legal proceedings. This  
4 conversation with Respondent confirmed my worst fears. Respon-  
5 dent is unsure of his own ability to secure the return of our  
6 son.

7 I am now convinced that my only hope of becoming reunited  
8 with John is to have a private investigator serve Temple  
9 representatives with an order issued by this court directing the  
10 Temple to release John to the investigator and to my custody.  
11 I have retained Joseph Mazor of Mazor Investigations. I re-  
12 spectfully request that this court issue the following order:

13 Pending further order of this court, Petitioner is granted  
14 sole physical custody of John Victor Stoen, date of birth  
15 January 25, 1972, age 5.

16 The Peoples' Temple and its agents and members are ordered  
17 to release John Victor Stoen to Petitioner or her duly authorize  
18 agent.

19 I declare under penalty of perjury that the foregoing is  
20 true and correct except for those matters stated on information  
21 and belief and as to these I believe them to be true.

22 Executed this 11<sup>th</sup> day of August, 1977 at San Francisco,  
23 California.

24  
25  
26

14  
GRACE LUCY STOEN

TO: CHARLES GARRY

FROM: PAT RICHARTZ

RE: Joseph Mazor, Investigator

---

His office in San Francisco is listed at 680 Beach St., with the telephone number 673-3077. When this number is called, a recording comes on saying the number is disconnected. I called the number on the letterhead and was told that the Beach St. listing is an old number, and the new number and address is 1800 Pacific, # 776-7232. I then spoke with Hal Lipset and was told that he used to be a polygraph operator and that he had been convicted at one time of a felony. I then called Sacramento and was told that he has a valid license number A 6804 and that he received the license in May of 1977. Prior to that time he worked as an in-house investigator for his wife. He worked under the license of a Donald Morris who has since parted company with Mazor. The State of California asked me if I was working with Mazor and I said no that some clients of ours had some unpleasant dealings with him and I just wondered who he was. The man on the other end said he wasn't free to tell me what was wrong with him but that I shouldn't be dealing with him. I asked him if there was some way I could get more information and was told that the State wasn't free to divulge anything else. I spoke with Fech about him and he said he had seen him at various meetings for investigators but didn't know him. He said we could run a public check on him if you wanted to.

Lipset says that Mazor's reputation is not to savory. He said that he would like to help People's Temple and had called offering his services. In his opinion what is needed is a good PR man and a blue ribbon panel of friends to clear the Temple.

BB- 31-a-73

July 1977

TIMOTHY OLIVER STOEN --- PROFESSIONAL RESUME

1. Stanford Law School: Doctor of Jurisprudence Degree, 1964.
2. Wheaton College (Illinois): Bachelor of Arts Degree, 1960.
3. Rotary Foundation Graduate Fellowship: England, 1961-62.
4. Admissions: California Supreme Court, 1965; United States Supreme Court, 1974.
5. Mendocino County (California) Practice:
  - a. Deputy District Attorney (Prosecutor), 1965-67.
  - b. Directing Attorney, Legal Services Foundation, 1967-68.
  - c. Assistant District Attorney (Acting County Counsel), 1970-76:
    - (1) Evaluation: "He has one of the finest legal minds I have ever encountered, and is an outstanding trial advocate. Tim is undoubtedly what might better be termed, a lawyer's lawyer." [District Attorney Duncan M. James.]
    - (2) Evaluation: "his dedicated and herculean labors as a public attorney and County counsel." [Board of Supervisors Resolution.]
6. San Francisco Practice:
  - a. Criminal Defense and General Private Practice, 1968-69.
  - b. Assistant District Attorney for City and County of San Francisco, 1976-77:
    - (1) May 1976, hired to handle Voter Fraud Scandal: Filed 39 felony indictments, resulting in 37 convictions.
    - (2) November 1976, appointed by District Attorney Joseph Freitas, Jr. to head new "Special Prosecution" felony team.
    - (3) Gave Training Instruction to prosecuting attorneys, emphasizing fairness to defendants in grand jury procedure.
    - (4) February 1977, resigned.
    - (5) Evaluation: "Your work before the Grand Jury and with the Press has been nothing short of sensational. Watching you last week was a pleasure. I have had numerous comments from lawyers, grand jurors, and press extolling your fairness, professionalism, and human qualities. You are a real credit to this office." [Chief Assistant District Attorney Daniel H. Weinstein.]
7. Service to State Bar of California:
  - a. April 1976, appointed by Governor Edmund Brown, Jr. to State Advisory Council for Federal Legal Services Corporation, pursuant to unanimous recommendation of Board of Governors of California State Bar as possessing "such superior qualifications and motivation" as to be in top 3 of 90 lawyers originally considered. Reappointed by Governor in April 1977.
  - b. 1972-73, served on State Bar Ad Hoc Committee re Local Governments.
8. Community Service:
  - a. President, Heart Association of Mendocino County, 1973-75.
  - b. Director, North Coast Coordinating Council on Developmental Disabilities, 1975-76.
  - c. Ukiah Rotary Club, 1973-76.
9. Professional Memberships: American Bar Association, California District Attorneys Association, San Francisco Bar Association, Lawyers Club of San Francisco, National Legal Aid and Defender Association; ACLU, NAACP.

=  
EXHIBIT A

BB-31-a-74

July 1977

TIMOTHY OLIVER STOEN --- CHARACTER REFERENCES

- Superior Court Judge Arthur B. Broadus: "He is an extremely capable trial attorney.... His work is careful, thorough and prompt. Add to this his fine judgment and common sense approach and you start to get an approximation of the fine attorney he is." [4/8/75]
2. Attorney Leo M. Cook: "His intellectual level is very high, and he has an extraordinary ability to analyze complicated issues. \*\*\* He is certainly incorruptable." [4/14/76]
  3. Chairman of Mendocino County Board of Supervisors Ernest F. Banker: "He has great integrity and a dedication to any job that he undertakes in a degree that I have found unsurpassed. I have never really known of any advice that Tim has given our Board that has caused us any embarrassment or financial loss, and our reliance on him is unequivocal." [4/15/76]
  4. State Assemblyman Barry Keene: "By virtue of his fair and public spirited approach to the practice of law, Mr. Stoen has garnered the admiration of the Bench and the Bar of the state as well as his community at large." [10/15/75]
  5. Former Stanford Assistant Professor of Law Jared G. Carter: "I have the highest possible regard for Tim Stoen's ability, integrity and fairness. I first knew him as a student of mine at Stanford Law School for the period between 1963 and 1965. \*\*\* Tim enjoys not only my high opinion, but also the high regard of the entire county administration and the Bar in this area." [4/15/76]
  6. Attorney and Mendocino County Supervisor Burgess Williams: "I am now completing four years on the County Board of Supervisors, and Mr. Stoen has always been our legal counsel. During that time, the Board has conducted many public hearings involving complex legal matters, and I have always gone into those hearings confident that our attorney was better prepared and more knowledgeable on the issues than any other advocate in the chambers. Mr. Stoen is an ethical, principled person whose character is beyond reproach. I don't believe there is a better public attorney in the State of California." [4/15/76]
  7. Mendocino County Bar Association President Richard J. Petersen: "He's knowledgeable, believes in what he's doing, is truthful to himself and therefore can be truthful to a jury; he's an honor to his profession. \*\*\* I would be hard-pressed to list one attorney--and I'm saying these words literally--not one attorney in the Mendocino County Bar who does not believe Tim Stoen an honest man, a principled man, an effective lawyer, and perhaps more importantly, a well-balanced man." [4/15/76]
  8. Superior Court Judge John J. Golden: "Tim is an excellent lawyer." [4/14/76]
  9. Attorney Merle P. Orchard: "He...has distinguished himself in the practice of law to a high degree. He also commands the utmost personal respect in this community [Ukiah]. He is both a fine scholar as well as an aggressive and exceptionally fine practitioner of the law. Of all the young men whom I have seen practice in the last 26 years in this community, I would place Tim, in all respects, at the very top." [4/21/76]
  10. Mendocino County Public Defender Joseph D. Allen: "Mr. Stoen compiled a brilliant record as a criminal prosecutor. \*\*\* I have found him to be deeply committed to civil rights matters as well as social justice, the vigorous prosecution of law breakers and vigorous protection of the county tax payers in handling the county's civil legal business. Mr. Stoen...in his professional capacity has a reputation in our county for fairness, intelligence, absolute integrity and total honesty. He is not active in partisan politics but he is in my opinion a very shrewd and deft negotiator. \*\*\* He enjoys absolutely the highest reputation by all who have known him in Mendocino County." [4/14/76]

EXHIBIT B

Be-31-a-75



RESOLUTION NO. 76-193

RESOLUTION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS  
OF COMMENDATION TO TIMOTHY O. STOEN

WHEREAS, Timothy O. Stoen has served as Assistant District Attorney of the County of Mendocino since March 2, 1970; and

WHEREAS, during that period of service he has acted as the counsel for the Mendocino County Board of Supervisors; and

WHEREAS, during this length of service Tim Stoen has demonstrated his proven ability and capacity for erudite and loquacious opinions; and

WHEREAS, he has brought to the practice of the public law an intense and dedicated concern for the well-being of all the citizens of Mendocino County and for the impartial and practical implementation of the public business; and

WHEREAS, this Board of Supervisors has come to deeply respect his candor, intelligence, and dedication as their counselor and attorney; and

WHEREAS, his leaving will be a loss for all the citizens of Mendocino County and will be a gain for the citizens of the County and City of San Francisco where he goes on to a new and broad challenge; and

WHEREAS, this Board of Supervisors wishes Timothy O. Stoen the best of success and fortune in the years ahead and assures him of their continuing interest in his return to magnificent Mendocino County.

NOW, THEREFORE BE IT RESOLVED the Board of Supervisors of the County of Mendocino hereby extend their warmest congratulations and appreciation to Timothy O. Stoen for his dedicated and herculean labors as a public attorney and County counsel.

BE IT FURTHER RESOLVED that a copy of this Resolution be suitably prepared by the Clerk of this Board for Timothy O. Stoen.

The foregoing Resolution was introduced by Supervisor Galletti, seconded by Supervisor Avila, and carried this 18th day of May, 1976, by the following vote on roll call:

AYES: Supervisors Williams, Eddie, Avila, Galletti, Banker

NOES: None

ABSENT: None

WHEREUPON, the Chairman declared the Resolution adopted, AND SO ORDERED.

ATTEST: Viola Richardson  
Clerk-Recorder

By Smiley C. Ditch  
Deputy


  
CHAIRMAN



EXHIBIT C

BB-31-a-76

April 27, 1978

Mr. George Harmon - Polygraph  
1182 Market St.  
San Francisco, CA 94101

Dear Mr. Harmon:

I'm sorry I couldn't make my appointment last Monday afternoon. Our budget meetings with B.A.P.C. took much longer than I anticipated. I will be prompt next Tuesday, May 2 and plan to be at your office at or before 3:00 in the afternoon. My check for last Monday's time is included.

Tim Stoen will meet me at your office to provide a second source of information. If you can think of anyone else you wish to have there, please notify me.

My main concern in asking for the lie detector test is to prove the falseness of the charges by People's Temple Church members, including my daughter, that I am a child molester and have abused my daughter sexually. However, I would also like to be questioned on the following charges they have made against me:

- That I molested a child @ TSC*
1. That I was a member of the CIA and worked for or was involved with the military junta that ruled Greece.
  2. That I engaged to Joseph Mazar along with a group of parents in an effort to get our children out of Guyana.
  3. That I along with other parents known as the Concerned Relatives are planning to send mercenaries into Guyana to kidnap our children.
  4. That I oppose my daughter's membership in People's Temple Church because I am disappointed she is not working with me at Trinity School.
  5. That I am in league with a right wing Congressman in a conspiracy to destroy People's Temple Church.

That's a pretty long list of charges and I hope they can all be incorporated in the test.

Sincerely,

Steven A. Katsaris

Encl: Check for \$50.00

cc: *Jim Stoen*

EXHIBIT D

BB-31-a-77

ENDORSED-FILED

APR 2 1978

VIOLA RICHARDSON  
MENDOCINO COUNTY CLERK

1 TIMOTHY OLIVER STOEN  
120 Montgomery Street, Suite 1700  
2 San Francisco, California 94104  
Telephone: (415) 391-5020  
3 Attorney for Plaintiff  
4  
5  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 IN AND FOR THE COUNTY OF MENDOCINO

10 STEVEN A. KATSARIS,  
11 Plaintiff,

12 v.

No. 39911

13 JAMES WARREN JONES, also known as  
JIM JONES; SANDRA BRADSHAW, also  
14 known as SANDRA INGRAM; PEOPLES  
TEMPLE OF THE DISCIPLES OF CHRIST,  
15 a nonprofit corporation; PAULA  
ADAMS; and FIRST DOE through  
16 FIFTIETH DOE, inclusive,  
17 Defendants.

AMENDED COMPLAINT FOR COM-  
PENSATORY AND PUNITIVE  
DAMAGES FOR LIBEL ON ITS  
FACE AND FOR SLANDER PER  
SE

18  
19 Plaintiff alleges:

20 FIRST CAUSE OF ACTION

21 1. Plaintiff is informed and believes and thereon alleges that  
22 Defendant SANDRA BRADSHAW, also known as SANDRA INGRAM, is and at all  
23 times herein mentioned was a resident of Mendocino County, California.

24 2. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST was and  
25 is a nonprofit corporation organized and existing under and by virtue  
26 of the laws of the State of California.

BB-31-a-78

also attached, all of which we have copies already  
so I didnt copy because too bulky:

1. full complaint of Katsaris v. Jones with exhibits,  
which include the full statement press release by P.T.,  
the Katsaris lie detector test, the accusation of  
human rights violations petition, yolanda's affidavit,  
maria's letter to Katsaris, the press democrat article  
of Katsaris handing petition to Hue Fortson

BB-31-a-79

also attached was complete complaint filed by Medlocks  
with all their exhibits, which didnt copy because  
we already have it

SEARCHED  
SERIALIZED  
INDEXED  
MAY 19 1980  
FBI - MEMPHIS

BB-31-a-80

POWER OF ATTORNEY

I, the undersigned, am the father of  
John V. Stoen, a minor of the age of 4

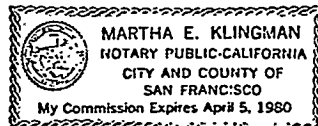
James W. Jones, Maria Katsaris, Joyce Touchette, Helen Swinney, and Eva Pugh, jointly and severally,  
my attorney(s) in fact with full power and authority to take all steps, exercise all powers and rights, that I might do in connection with said minor. Without limiting the generality of the foregoing, I specifically authorize her/him/them to procure any and all medical and hospital/dental care that may be necessary or desirable; to apply for passports or other travel documents on said minor's behalf; arrange for said minor to travel or travel with them out of the country; place him in any public or private school that she/he/they may deem appropriate; and to do any and all action that she/he/they deem(s) appropriate for my said son's wellbeing.

Executed on September 30, 1976 at  
San Francisco, California.

Timothy O. Stoen  
Timothy O. Stoen

Subscribed and sworn to  
before me this 30 day  
of September, 1976.

Martha E. Klingman



BB-31-a-81

Notes to Joyce Touchette

Case called in Chambers before Bishop J (he had granted the Orders) & so he would have to eat humble pie to reverse his Own Orders.  
But this is procedurally correct

↓  
If we fail & this is possible before the same judge, but our case is so overwhelming I feel it ought to succeed even before the same judge.

↓  
Then our next step is to appeal to the Full Court of Appeal. I have every reason to believe that the judges there will agree with us & set aside the Orders

↓  
If we fail (& this is most unlikely) we will go before the final Court of Appeal presided over by the Chancellor. (S.P. Haynes)

My firm conviction is that we MUST succeed!!  
And there will be no need to go to the final Court, although if Grace Stien fails she may well do so.

The case before Bishop reached the scir-mushing stage. Bishop was contending that Touchette's Affidavit might be treated as a Return of Service for Jones. I stated that Jones has NOT been served, he has entered no appearance.

- I am NOT appearing for him. Touchette is on her own seeking to get aside Nullity Orders because they affect her.

The case may well take the entire week!!! It will be long drawn out & will be argued by Lloyd Lucker (S.C.) & myself  
Lloyd Lucker

BB-131-a-82

2.

The negotiator tells me he is sending up  
none to save any further papers.  
What I seek to establish is that the  
slate should be wiped clean i.e.

No Orders must remain  
appt. Jim Jones  
So the contempt proceedings will remain "stat"  
if Grace Stoen does come down (a  
possibility but unlikely) she cannot give  
evidence or be heard as —

The case in its present status must  
be held good or bad without  
supplementaries.

Nothing is impossible but for us  
to fail to get the orders "stricken"  
is as near as possible to an  
impossibility

All of our lawyers are working on Sunday  
in the Law Library to make assurance  
doubly sure. At the end of the line I can  
see no order outstanding. They are a MULLITY  
LH



1977. No. 2534 - DENVERA.

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE.

CIVIL JURISDICTION.

In the matter of JOHN VICTOR STONE,  
an infant,

- and -

In the matter of an application by  
GRACE LLOYD STONE by and through her  
lawful attorney JEREMY A. SMITH, for  
a Writ of Habeas Corpus and sub jurisdiction.

- and -

In the matter of the Civil Law Act,  
Chapter 6:01.

*Joyce Touchette of court  
will be forwarded later  
to her. I do not have  
a spare now lol*

SESSIONS.

LET ALL PARTIES concerned attend the Judge in Chambers at the Law Courts  
at Georgetown, on Tuesday the            day of September, 1977, at 9 o'clock in the  
forenoon on the hearing of an application on the part of JOYCE TOUCHETTE for  
the following:-

- (a) An Order that Joyce Touchette of Jonestown, Port Kaituma, North West District, Kaituma, be added and joined as a Respondent/Defendant in this said Cause or Matter as a person directly interested and concerned in the same and as a person who has been affected and will be affected by all Orders made or to be made in this said matter.
- (b) An Order that the Orders of His Honour Mr. Justice Bishop (in chambers) made herein on the 6th day of September, 1977, 8th day of September, 1977, and the 10th day of September, 1977, be declared void and/or a nullity and/or of no effect and be set aside ex debito justitiae.
- (c) A declaration that the procedure adopted in respect of the service of the Writ of Habeas Corpus on Reverend Jim Jones and/or the alleged making of John Stone a Ward of Court and taking him into custody, and/or the grant of leave to commence Contempt proceedings against Reverend Jim Jones, and the Orders in connection therewith are all irregular, contrary to the Rules observed by the Courts of Guyana and contrary to the Laws of Guyana and contrary to the Rules of natural justice, and are an abuse of the process of the Court and are a nullity and should be set aside ex debito justitiae as a nullity, and contrary to Article 5 of the Constitution of Guyana, Chapter 1:01.
- (d) A declaration that the proceedings by way of Writ of Habeas Corpus in which Reverend Jim Jones is not even named as a Respondent/Defendant

88-31-a-84

are bad for want or lack of jurisdiction, of the High Court of the  
Supreme Court of Guyana.

AND the costs of this application may costs in the action.

DATED this day of September, 1977.

*Sps McDom &  
Solicitors*

This summons was taken out by Mr. Mohamed Ayube Ally McDom, Solicitor  
of McDom & Company, Legal Practitioners, 2 Creal Street, Georgetown,  
Demerara, for the Applicant herein, who resides at Jonestown, Port Kaituma,  
North West District.

To:- The Plaintiff

- and -

Mr. H.D. Fraser,  
Solicitor,  
Hughes, Fields, and Stoby,  
Legal Practitioner,  
62 Hadfield & Cross Streets,  
Georgetown, Demerara.

BS-31-a-85

**SUBMISSIONS.**

1. On application for joinder ..... English Supreme Court is made under O 14, r 14 ..... equivalent O 15, r 6.

2. In my case Joyce Touchette entitled to come to Court as she was served with copy of writ of Habeas Corpus and Order of Court made on the 8th September, 1977. She wishes to be joined in her individual right (a) As a person served (b) A notarised guardian

3. Cases re Joinder

*Authorities :-*

Anon v. Tuck & Sons Ltd. (1950) 1 Q.B. 357.

Jacques v. Harrison 12 Q.B. 136.

In Anon's case plaintiff objected to the joinder.

Courts-asked In his proceedings before the Court necessary?

Will it cause a multiplicity of actions?

Has the 3rd party an interest in the Order made? *Yes, Tom!*

*Joyce Touchette has a Custody Deed, not revoked entitled to be heard*

4. The Habeas Corpus Proceedings are a Nullity -- *1. The Haas proceedings taken out for Grace Stoen*  
(a) Improperly and/or irregularly commenced Subrules-

Application by Grace Inoy Stoen by and through her lawful attorney Jeffrey A. Haas for a writ of Habeas Corpus and sub-judicatur,

- and -

In the matter of the Civil Law Act, Chapter 6:01.

*Attorney means an Attorney under a Power of Attorney & not just a Lawyer*

Our Supreme Court Rules - O 4, r 4, 5i-

If a plaintiff sues in a representative capacity, the indorsement shall show in what capacity the plaintiff sues ... The indorsement shall describe the document proving such representative capacity and stating its date, if executed in the Books Registry, and the date of the receipt or deposit as of the date it executed elsewhere.

There is no such indorsement. This is a representative action and the right to bring such action for Grace Stoen must be established. This is false

*→ On this entire habeas corpus should be declared*

*BS- 31-a-86*

(b) Haas has established no authorization for the making of the Affidavits.

vide para 2: "I have been specially authorized by Grace Stoen to appear on her behalf etc."

This is his own dicta, no authority filed who is Haas?

Has he proved that he is a lawyer *There is his P.A. in U.S.A.*

In February 1977 (7 months ago) I filed a Petition for dissolution of marriage between Grace Stoen and Timothy Stoen and a demand for custody of the minor John Stoen.

Jim Jones was not a party.

para 5: "Refers to a Court Order Ex. 3"

This Order is of no effect in Guyana. Jim Jones is ordered to appear in Court on October 6th with the minor child John Stoen (Order No. 7).

Any previous authority to Jim Jones to act as guardian is declared null and void (Order No. 16).

Note Joyce Touchetto's guardianship has not been revoked.

para 9: "Refers to Affidavit sworn to by Grace Stoen on the 18th August, 1977. Ex. 2"

Note this Affidavit Ex. 2 is improperly on the file. It is not filed asking the Guyana Court for the child but the U.S. Court. In other words there is no proper accompanying affidavit to the writ of Habeas Corpus removing the whole thing void and a nullity. **Fatal**

para 12: Haas says: "I am entitled to the possession of the said infant by virtue of the express wishes and authority of the Mother Grace Stoen given to me."

Note:- This is merely his statement. The Mother would have to receive the child if there were a proper application which succeeded.

*Haas has filed no authority given him by Grace Stoen & consequently cannot act to propound an affidavit*

*Matrimonial Proceedings those & should be struck out*

*Matrimonial Orders are of no effect in Guyana if made elsewhere.*

*Irrelevant*

*Very Important*

*should be stricken therefrom*

para 13: " I ask the Guyana Court to deliver to me  
forthwith the said infant. "

Proposed Affidavit: This not a proper  
affidavit to found the issue of the writ.

para 14: " I authorize Messrs and/or Said Official to act  
as my Solicitor etc ...."

He has no locus standi to authorize anyone

Case and Authorities - Annual Practice 1954

Halsbury Vol. 11 p36: " The writ of habeas corpus is grantable only  
upon reasonable ground for its issue being  
shown. " It is not granted as of right.

p33: " A parent, guardian or other person who is  
legally entitled to the custody of a child can  
regain that custody when wrongfully deprived  
of it by means of Habeas Corpus writ. "

p37: " A stranger or volunteer who has no authority  
...will not be allowed to apply for habeas  
corpus. " R. v. Gwynn (1750) 3 Burr. 1170.

p39: " The application must be accompanied by an  
affidavit. " R. v. Gwynn (1750) 3 Burr. 1170.  
R. v. G. (1854) Halsbury Case (11) 3. 1171.

See R. v. Scherschensky (1972) 8 T.L.R. 571 Court orders of habeas corpus  
Widely Admin's Procedural Tables - children to father

- No. 1 " Where application is made by parent or guardian...
- No. 3 Applicant files affidavit.

At p.60 there is a specimen form of Affidavit  
supporting application. It is by father or  
mother or guardian and the applicant applies  
to the Court in question for leave to issue a  
writ of Habeas Corpus, directing delivery to  
her, the applicant.

BB-31-a-88

... asking the Guyana

Service of the writ.

The service was <sup>affected</sup> not on Jim Jones, yet Court orders:

- (a) Substituted service by affixing to buildings and a copy served on Joyce Touchette;
- (b) Court ordered child to be taken into custody;
- (c) Leave for Applicant to serve contempt proceedings against Jim Jones. (The Applicant is Hans For Grace Steer).

Halsbury Vol. 11 p19: " The writ must be served personally if possible, on the party to whom it is directed.

*this has not been alleged much less proved*

If it is impossible to effect personal service, service must be effected by leaving it with a servant or agent of the person to whom the writ is directed. "

Atkins p.9: " If personal service is impossible ...."

p19: Reports the same caveat, only if service impossible.

The necessity for personal service becomes clear when one looks at Atkins Vol. 12 re Contempt p.103. Evidence supporting an application for attachment or Commital is by affidavit served with the motion and must go to prove :

- \* 1. Personal service of the Order ...
- \* 2. Failure to comply with the Order.

\* The Court will only commit or attach if satisfied that the breach of the judgment or order was willful.

O 54, r 6 (Annual Practice) states:

" If it is not possible to serve such writ personally or if it is directed to a Governor of a Prison or other public official it may be served by leaving it with a servant or agent of the person to whom the writ is directed at the place where the person resides or carrying on his business. "

*If John Steer was not at Kautuma then any attempted service fails !!*

There is no evidence that at the time of the ...

BB- 31a-89

service John Steen was at Kaituma.

Two things would have to be shown before such a writ of habeas corpus granted:-

- (a) Impossible to serve on Jim Jones and
- (b) John Steen was at Kaituma.

*This negates impossibility*

Re (a) His own affidavit shows that Jim Jones was at Kaituma on the 6th September. So impossibility does not arise on his affidavit.

(b) His own affidavit suggests that John Steen was still there at Kaituma.

Therefore all Orders and in particular the Order of September 1978 is clearly a nullity.

In *Greig v. Innes* (1919) 1 A.S.J.R. 107.

Every aspect of this case is relevant here.

Facts are: Judgment was given in an action in 1917.  
 Order giving K (the successful plaintiff) leave to proceed to enforce judgment in 1919.  
 A receiving Order is made against K, in 1919.

*as in Steen's case →*

K contended that the Order improperly made as the summons asking for the Order had not been served on him and he therefore took out a summons asking that the Order giving leave to proceed should be set aside.

Master Morridge ordered that the Order giving leave be set aside. On appeal to Crom-Johnson J. the Master's Order was reversed. He then took matter to Court of Appeal ....

Was the Order a nullity? ALL the authorities were traversed showing Court or Judge may set aside even its own order, as the Court had inherent jurisdiction to set aside its own Order. The Order was a nullity for the failure to effect proper service and so the Order made had to go.

See also *Wright v. Holt & Carter Co. Ltd.* (1916) 3 A.S.J.R.

Lord Denning: "An Order which is a nullity is automatically null and void, without more ado, though it is sometimes convenient to have the Court declare it to be so. You cannot put something on nothing and expect it to stay there. It will collapse."

BB-31-a-90

*James C. ...*

*Custom*  
They went through our crates with a fine tooth comb. You ~~would~~  
to know we couldn't have gotten in with them. ~~It~~ <sup>9</sup> would like to  
*given* know where those 150 guns went? They were turned in, some by even  
by older people, and they were supposed to be turned over to Mayor  
Mosconex in the drive they had. But ~~he~~ didn't do it. So why did he  
have that cache of arms under his house? We were pacifists, so  
why did he keep them? Thus far, all that you have ~~done~~ <sup>he</sup> has been  
the most radical, vicious, communist wicked anarchist that you could  
name

*G...*  
Little did we know he was planning to murder Lester Kinsolving until  
a social worker bothered to tell us after he left. He had asked her  
to research poisons. The custodians would no doubt remember him,  
staying there night after night, studying books on how people got  
away with murder. She ~~will~~ sign an affidavit and take a polygraph  
test. We also have witnesses in the Ukiah area who are not our members  
who are incensed now when he says things about God when he ~~is~~ literally  
stomped on a bible ~~in~~ in front of a group of people and said it was a  
lie from cover to cover.

We sincerely hope you are not a party to this. If you print this  
article, we will know what a prominent bay area ~~editor~~ <sup>is</sup> said about this  
being a combined media smear, is true. He has proven conclusively

BB-31-a-91



JOS notes in his handwriting

re strategy to take in  
the previous audit we had  
some years back —  
we have original in legal  
files.

BB-31-a-92

June  
5-19-78

To: Claire

In casual conversation: Points to make:

(1) One of church members I mentioned the audit to did not understand - wrote letter. I told him not to send

(2) Do not make us look too large yet at same time reveal how principles we are ready to fight for our beliefs eg hundreds picketed K, causing him to lose job & making himself

(3) The members of the church give to every kind of charity, not just their own church

(4) I was talking to a number of members and they mentioned having been harassed for supporting a minister (Presbyterian) on some issue

(a) ~~IRS did~~ The members asked if IRS still did this but the pastor said he didn't think so.

(5) A number of supporters of anti-IRS Congressional candidate Oscar Klee came to our pastor for support but he said he wouldn't do it & now support him

(6) The members of the church have amazing solidarity - they really support one another

(7) The incident of harassment consisted of 70 or so of the church members sending a petition to a Federal judge on behalf of a Presbyterian minister who helped people and was trying to do something for poor conditions and that someone getting a fair trial

(a) all 70 letters to IRS Zurich letter documented

BB-31-a-93

To: Claire

In casual conversation: Points to make:

(1) One of church members I mentioned the audit to did not understand - wrote letter. I told him not to send

(2)

(2) Do not make us look too large yet at same time reveal our principles. we are ready to fight for our beliefs eg. hundreds picketed k, causing him to lose job + making him angry

(3) ~~The~~ members of the church give to every kind of charity, not just their own church

(4) I was talking to a number of members and they mentioned having been harassed for supporting a minister (Presbyterian) on some issue

(a) ~~IRS did~~ The members asked if IRS still did this but the pastor said he didn't think so

(b)

(5) A number of supporters of anti-IRS Congressional Candidate Oscar Klee came to our pastor for support but he said he wouldn't do or have support him

(6) The members of the church have amazing solidarity - they really support one another

(7) The incident of harassment consisted of 70 or so of the church members sending a petition to a federal judge on behalf of a Presbyterian minister who helped people and was trying to do something for prison conditions and about America getting a fair trial

(a) all 70 contacted by IRS 2 weeks before day returned

BB-31-a-94

## Reds Kept Local Student 15 Hours Without Food for Taking Photos

Fifteen hours in Communist hands. That was the experience of Tim Stoen, Littleton graduate, who had the audacity to take a picture of a sign being erected in East Berlin.

Stoen told about his ordeal at the Rotary Club last week after returning from a year abroad on a Rotary Fellowship.

"I thought I should go to East Berlin and see what it is like behind the Iron Curtain," Stoen said. "The first thing that I noticed was



TIM STOEN

the blank expression on the faces of everyone. You could tell they were just waiting for the day they might have some freedom. This will come slowly. Poets are already getting some freedom, and so are theatrical people and musicians. It was noteworthy that a journalist was able to print in Moscow the interview with President Kennedy."

### Began Taking Pictures

Stoen said he took a number of pictures in East Berlin without difficulty. Then he took one of a sign being erected near the newly-built wall.

Three German officers rushed over to Tim and an East Berlin student who was showing him around. They took the pair at 12:30 p.m. to a building and held them there until 8 p.m.

"I was fearful for my new-found friend because he had taken too many liberties for the Communists, and I didn't want to get him into trouble," Stoen said. "Finally, at 8 p.m., three men escorted me out

of the building and put me in a Czech car. We drove and we drove in silence. I didn't know Berlin was so large. We came to a building with bars on it and I was taken in and questioned. They kept trying to trip me up, coming around to the same questions in different words to see if I would contradict myself. I had to take everything out of my pockets. They found a roll of exposed film and kept it. The guards were curious about my nail clip and wanted to see how it worked. They had never seen an American coin purse that opens a crack when you bend it, and they were like children with it. I was getting both weak and apprehensive, and I was trying to test the power of positive thinking. I had had no food for 15 hours and I was glad when they brought me some unpalatable ham sandwiches. Soon afterwards, they took me to the border and let me go."

Stoen had a happier experience in West Germany, 5 miles from the East German border. A little old lady recognized him as an American without much in the way of funds.

"She pressed two things in my hands," Stoen reported. "One gift was about 40c worth of coins and the other was a sack containing four bananas. She told me that she loved Americans for the kindness she received from them at the close of World War II."

exerpted from Trip notes:

I saw things that textbooks and newspapers can't make vivid. I saw what a police state can do to individual human beings....I will now talk of the most startling and disconcerting experience in my life.

The restrictions of a communist police state are as bad as you read about. At newsstands you buy papers of East Germany only which serve as propaganda only.

... more notes---- pages of unreadable stuff on East Germany and how he was treated while under arrest.

.. "now I will reveal some information gleaned from a person I met but whose name I can't reveal because I fear for his safety.  
-that each week a person must attend meetings some as often as 2-3 times a week. Meetings can last as long as four hours--what is discussed is Marxist writings and the virtue of a democratic state. The groups are so arranged that they separate friends and people with common interests are separated. My informer told me that the meetings were not too successful in indoctrination because too many people had been to the west.

-He said that if East Berliners has known before the borders were being set up that 40% of them would have left all worldly goods to escape. Less than 10% of them still support the regime

-It is extremely difficult to have an underground spying system because you can't trust anybody.

-Even in East Germany army Saxons had to be brought in from other areas to keep check on the local soldiers because many of the local soldiers had anti-communist sympathies. It was from fear alone that most men carried out orders. One must note that the system of morality is quite simple. The soldiers are told that there are two kinds of Germans good and bad--the good are those who obey communist orders and the bad are to be shot.

-ending sentences:

"But when you see what people like you and I have to go through. They just want one thing. They want freedom to think and act as they see fit--to be able to choose between alternatives--where to work-- and how to live and whom to worship--a state or a God--- they couldn't care less about creature comforts.-- All I can do is anguish about the problem and pray to God that it won't last forever.

TOS

*Very important  
in seeing TOS  
perspective -*

BB-31-a-96



(2)

6) Friday: Sept 15 Friday

1. Approx: Sept 10-14th - changed away - both cases - ...

2. Be on underground - ...

3. ...

4. Went to bookshop and met a ...

Ullrich was about 5'10, ...

We walked around - ...

- It was ...

- The ...

- ...

- ...

- ...

- ...

- ...

- ...

- ...

- ...

- ...

(B)

(C)

(C)

Challenges  
communist in any  
form - I've later  
called meetings at  
home a week  
ago - I don't  
know if I should  
be in charge of  
the propaganda, etc.  
these meetings.

(C)  
get pictures  
to show to  
other clubs

I really worked more last night with a heavy jacket and then I could not get into bed  
to expect more of this.

At the hotel last night I related the experience and a short session with some of  
the guys - a tank, a four-car car - we talked, and I guess I know they had spent a great deal  
more American did not see about their own people, what people the College of had had to  
put up with, and how it had the to really of one person with what I'd describe a "vicious  
conflict" they expressed their but after some discussion we came over to look for it - a group  
it was wanting to not just change but wanted to U.S. self-determination they felt the U.S. as  
the type of people - and then say that the U.S. had some large excellent people who had not  
but have been dishonest at its reluctance to stop the Communist aggression in the  
substitute countries. I recognize that one of the main reasons for this is that we have not  
always been predict and do not recognize - I recognize danger in this daily through out the day  
the war. As a political scientist I recognize the danger to put to people with a certain amount of  
fun of long questioning, and that power politics will be involved. Yet it probably will add a  
within balance to maintain both to the pleasure of people who are regular a piece in C-10 and who  
live with little security of having being free from conventional activities. The whole situation  
is to explain through it what we have what we do.

One more thing - I had Council to show in the communal establishment of C. 10 - the  
party was - or the weekend making she met a fellow from the British U.S. - I mentioned what  
at what had happened to I had to be at that point - had had to be - should a heavy count - and I  
told Ulrich told me he had left Britain as a student and supported the Communist and that since his  
escape from had been his at the university - he had been in the group for some time - because his  
to a letter for some of our own - Communist in America, but God knows how - but I see what  
Communist position with it has to.

Next day  
Went to to Berlin - bought Ulrich's book and came in at 10:30 so that  
I could talk to him before seeing Ulrich. By a strange coincidence Ulrich had to be in the same  
hotel, you see you who with his car, and see a we - I said I wanted to follow the  
border north, where trucks do 4 corners go - to see the industrial area, the suburbs and  
the town itself - but Ulrich said he had no jet and he and appeared qualified for the driving he  
do with me. I started to go - I came by a car with and saw something that stopped a group  
near the "people's newspaper" had really could be used with for a case and shot in 3-5" piece  
of jagged glass to stop people climbing into the buildings when trucks took it had to expect an escape.  
- Back street, groups of children, women with market baskets  
Bunches people hanging out from the hills.  
About 200-300 ft from hills - groups of people some did nothing stood just standing  
and particularly a school - plus more would come to watch you - even though they were  
not - belonging to other clubs to go to groups - or be instructed don't faint.  
- The hospital is a 70-year  
border seen from back street  
Count at that heavily built - could track - at least 3 ft or so  
I saw adding about 5 ft more -  
at 10:30 - dense simple houses  
An area 10 yards - at each street - roughly 200-300 ft. An area





Adrian film - nervous breakdown, just did why - saw cars - except being allowed to  
leave early

Then 2 am home - 8:30 -

Then the dentist movement -

3 dentists - one - with my friend away

then 3 - one - took us -

low combs - 1 kept

not to show - 1 kept

with a - found goods lot of dirt

and to a - car, took door open, they put there for me to get a

and I was off - walked into the night, just like he wanted.

But as for 2 but we also what my shoes was - but didn't feel too optimistic -

1/2 minute later an - part of car - you very few can answer & it

was right - pulled up at this with ground wooden - but, we take cigarettes and didn't

see any - they parked me to - they said in empty my pocket. We tried to - left me to

well. One of the people was a young fellow with glasses - after checking English and

appeared generally friendly to me.

Then from amongst and a young German - blond hair, like brother -

of all business, came in. did promptly and ultimately dig out all the

details of my - to East Berlin, to Europe, etc. +

Then telephone to to 10th minute detail & try to build a picture.

They try to cover you up by suddenly changing the flavor of questions & replace

a question you around the sun. I was sure I was on a - I was sure I was on a

calculator and provide that I shouldered to their part -

as Communist of East Germany. Some - what we - the West, with

an American comforts, and brought - to get easy way out, and would

had to compete with.

- Berlin features stood out:

1) the usual brain - interview - especially you are to - can only see from the case

with when they asked the distribution of - but some - I'd only

be arrested for 11 hours no food, I assumed eyes. So got about

8 or 9 food sandwiches, - and one tea.

2) Then I was - I didn't know for sure what they were

but finally for a while, - of what it - but as my answer

seemed innocent (eg. they - to Berlin - following a guidebook

say, Berlin good place to visit; why - Berlin; Gellman & Hertz told me

about, My didn't find what they were looking for: - promised to help

return for - for spring, or to help G. Gellman escape - that

then to find they didn't want to work with - I walked out of it - saved me

3) The whole loop of my last attempts.

but his strength genuine to contact with one single trap in my pocket -  
 except a 25¢ nail clipper - but since we are here and it was tedious  
 to watch him unsuccessfully try to figure out how it worked, so the day was one  
 of pure shock-type, can't remember with a slit in it that you might squeeze it. He  
 chided at it - it had the look of a Leica back on it.

- After some other for 9 or 10 to 3 am I got up to get a quick - otherwise  
 question or else really see if he'd actually write at long hand every day I'd said,  
 - There was a film I had somewhat "forgot" to copy the last one that he put here - and when  
 I knew I'd be needed I tried to remember in private for it had a better picture  
 in it even though and probably would have been better than the one I had decided  
 to. Entered in what it looks like.

At 3 am. Mrs left and said I should sleep in the chair. The left of my  
 shot of 2d one I was quite tired I got a quick sleep. Occasional in  
 my mind from the pain his head in to see if the spot was safe. The 7  
 was hard to sleep for for my just might develop the film - but I felt that  
 I think that they never appeared to satisfy me.

About 7 am, anyway very early a.m. I noted some of woman + child  
 possibly at the job. The 3 recalled that in 4 Bels. They make a very day  
 not only in it a comic not to vote but you have to vote at certain times -  
 usually for for seen to 12 - else you are not a good citizen. And it  
 between E. Belis to appear a good citizen. I wondered how many  
 people would get up at 6 or 7 am. to vote see it a free democracy.

Because he didn't see  
see handle for newspaper  
and it being after

At 4 or so - interruption - and the Chuffy left our door  
 and little laugh came in - and to my delight relief - good. And in the middle  
 of my trip, "warily" the film, and I'd take me to the 6:30 train  
 at the Washington Metro station.

So I was driven by two men in an old car. The first ~~was~~ I believe  
 to the skin, and show me some good stuff. My first advice was quiet  
 "well: it was safe to the effect that "I think it's dangerous for you to  
 long to go to see her brother with your camera." I mean he didn't do  
 the low to my own end, and maybe, I'd like to see after you a very  
 demand. feeling.

Next day I was back safely away from the house and from following  
 pattern of interest. I got labor adjacent bldg. with a red flag erected to  
 the world that since to man because Adenauer was elected, and  
 that "another Hitler reign again."

(1)

- (2) propaganda poster with children being used to hit duty cap. 1st emblem.
- (3) picture of small children playing outdoors on one of better built areas. not too badly built.

(4) some magnificent feldg seen by car - but splintered even in ruin.

Some of the things discovered by talking to people. Holding up an event  
How I will reveal some information gleaned from a person I met but whose name I can't reveal because I fear for his safety, e.g. that

(1) That every week every person must meet attend meetings, usually on a 2-3 hour week - meeting can last on long as 4 hours. What is discussed are broad writings and the virtues of dem state. I saw the groups as to a varied but mixed friends and people with whom I was not acquainted. My impression is that the meetings were not for political or for an ideological purpose because for some people had been the what they had seen in the past. I saw the groups as to a varied but mixed friends and people with whom I was not acquainted. My impression is that the meetings were not for political or for an ideological purpose because for some people had been the what they had seen in the past.

(2) The fact of the E. Berlin people had become by the fact he tried to be set up that 1950 or there would have left all worldly goods to escape. That in the 1950s actually actually support the regime. I also added the fact that it's being clear the West knew about it. He replied:

(3) That it's extremely difficult to have an underground spying system because can't trust anybody that he only evidence. His person knew for one was that after the wall was announced on 9 midnight... he suddenly a light of the border was a surprise mysteriously went out - presumably to give people a chance to escape in the darkness. But that the lighting was restored in two hours.

(4) That when in the army. Soldiers had to be brought in for other areas to help a check on the local soldiers because the local soldiers had anti-Communist sympathies, and it was fear alone that made them carry out orders. One must note that the system of morality is quite simple - the soldiers are told that there are two types of Germans, good & bad. The good are those who obey Communist orders, the bad are those who do not, regardless of family or a friend.

(5) That there were the feelings of never allowing soldiers to form act alone. At always 3 or 4 or 5. Even help with and come up to reinforce the duty in the mind of the soldier.

(6) That the soldiers were brown people like can't be trusted because they would jump on the wall - so I saw the ludicrous sight of German soldiers - some pulling the walls back by hand.

(7) The most dangerous part - even they were that the people were not faith in the West. The belly of Communist keep nothing away - and the 1953 uprising in Berlin and the 1953 changes especially showed the West was only a clique are represented increasingly easily - but recently the kind of Protestant churches found to have been a choir of saints & such for supporting family & a Berlin.

②

hope, the best & particularly America, refused to intervene. Power politics is of course recognized as controlling but the false idea of the people is and to be left. It is wrong that they think they know it would be foolish. They would never go to do something a month, six months, or a year. That they are willing to do the secret just to have a moral conviction of worth against a "Satanic" system - his words. A sin told like by few we met Mr. E. Henry King - became his'd. every one to be popular but the moderate, green spectacles of medicine. Russian banks. They resemble Hungary too well.

Re Conclusion. I understood why the Communist hated Batista -

- 1) Long stay before
- 2) giving preference to west bearing refugees
- 3) Long 9 by people for 2. position in W. Bahia

They like the game of clearing the order, not knowing what world do something or not. The King worked. Many say, literally slaves more. Not the west but to reach up for its mistake by playing game of "check" - ready to be, up to the order, trying to show progress, etc. Judge in full of mistakes. Maybe it's defensible when people are serious, but they don't do it but they can. But when you see what people like you as 2. have to go through. They could be called "his point recreation computer". They get what one they - freedom to think and act as they see fit. - to be able to choose what to read, where to work, and how to live, and whom to worship, baptism <sup>meditation</sup> or a "God". I have no answer, all 2 can do is argue about the problem and maybe to pray to God for his life but it won't last forever. And a ~~... to be sure~~ <sup>of course</sup> ~~... made~~ <sup>... made</sup> a ~~... to~~ <sup>... found</sup> in the days of adversity, they don't.

Dear Dad,  
Just to say how I feel  
about Jim Stone and the  
murder of Mrs. Stone.  
I don't know how to do  
it, but please they are trying  
to stop our movement and  
the death of your son and son  
brother Chris Brown. I know  
you aren't violent neither are  
we. If it would take death  
for them, let it be. I will  
never speak for Jim Stone  
or say you have been hurt  
enough to live with him to  
get rough with Jim Stone and  
the murder of Jim with you. Dad  
what ever you do to stop them, I  
will be here to help you for our  
land our children. I intend what  
I can. Thank you Dad for your love  
and concern for the family in the  
States. I love you.  
Margaret Stone

86-31-4-105

12/20/72

Dad

I think the ~~best~~ way to get Jim Stone would be to set him up real good.

Make an appointment to see him on some normal kind of business so no one will know where he's gone. Take him out shoot him with smack (C.O.) and dump him in the trash bin or near one. We could also dress him in women's close too. You know he was so depressed he O.D.'d. He really is in a hell of a spot left the freedom land to go into Capitalist swine.

People do get shot just walking down the street in the states.

I'm willing to do what ever it takes to keep our people free.

Thank you  
for this beautiful  
freedom Land

Denise Hunter

BB-31-a-106

Dad

I think Tim Steen has gone to far, I think giving him money would be showing him weakness. I think they looking for weakness since they killed Chris.

I think Tim should be killed I like Maie Lawrence's idea about making it look like a sexual murder, we could kill him and change his clothes and dump him somewhere. I think all the traitors should be killed in time in away that fits something about their past, like kinda Mertele I understand she use to shoot Harkin we could kill her with a overdose of Harkin.

I feel our first priority should be to get our family here, even if it means less food for awhile and overcrowding I dont think that should matter to us when our family is over there in danger. Its obvious the traitors dont want to see our people here and if

BB# 31-a-107



they killed once and tried to kill  
mother, they'll do it again. The money  
Tim is asking for could be spent  
on getting the rest of our family checked  
I'm willing to do what ever I'm asked  
to do in bringing down our enemies  
and getting our people free.

Thank you Dad  
Kauri Hains

BOF 31-a-107

Dear Dad. (1)  
Peace & Love. I dont really  
think a person like Lem Stone  
should get away with these  
things and this last one. I  
suggest that we call on our  
Friend or friend and have them  
Put an end to the stones & matters  
near and who ever that try to  
harm you and mother and our  
children as far as I can concern  
BB-31-a-108

I dont expect to live in  
eternity so it can be sooner  
or later as long as it will  
mean you your children and  
this cause. I mean all the  
children who is the future  
of this world. dont give them  
a penny, and have them know  
when it happen that is what  
they done to teddy Lewis.  
Julia Burkley BB-31-a-109

Jim Stone  
could we lead him or until we get all of our  
people over here? Then then I should like  
to feed him something so that would make  
die a long agonizing death,  
Thank you Dad.

Ernestine Blair

BB-31-a-110

Jonestown

Is the Greatest leader in  
the world in the world.  
I am writing these few lines  
As I was ask to do about  
what I think should be done  
with that man name Jim Stone  
I think he should be put  
to death in a way I can not  
describe but one thing I  
know he should be allowed  
to live another day -  
I say <sup>in</sup> some way dont let him  
live if he's drowned in some  
River or ocean

Jessie  
Johnson

BA- 31-a-111

Dad,

12-19-77

Mr. Mayor told me that someday there would be a  
loop hole to get to you I think that loop hole is Jim Stoen only  
I don't think Mayor expected that at the time. He said he had  
to figure out what you think has thinking that counter act  
that, but you are always one step ahead of him - he also said  
something about Jim being your right hand man as I told you  
before, and that you would be in trouble if you lost him.  
I think they told Stoen to get to him and him being the fool  
he is figured Stoen wanted him back, they offered Stoen money  
and again decided to try to help her get John back. But then  
he found his self in deep water cause Mayor figured he got  
the one with him. I think that the death of Chris has  
planted a doubt in their minds because up to now your power  
has stopped all things with Chris. "Maybe since you let Chris  
die & Jim get away that you won't be powerful  
after all and that maybe things are collapsing" - I think this  
is what Jim thinks - and so they come up with blackmail  
to see if you are weakening. I don't think Jim would think  
of it himself I don't know. I think they would & will try to  
bring things against Jim Cym, Randolph, people like this, in  
a legal type thing in order to get to you. If the money  
was paid ~~the~~ <sup>the charges</sup> would be a constraint I feel and also  
the money would be used to help them grow stronger.  
I think people should be made aware that we are  
standing strong <sup>by letters</sup> I mean in all Socialist countries &  
even letters to all parts of people in the U.S. telling  
our story & what we feel we should do. I think  
the conspiracy & Stoen should be led to believe that  
some of us were coming back for awhile & to take  
care of some legal or ~~personal~~ things. I know this

is one thing they would not expect. I think they  
best would be off for awhile. I think what Standa  
said was good that when our people get out of  
there then send some back to kill off Stoen and  
maybe a few others (if not all) in various ways. Say like  
a car accident, some thing that could not be connected  
or proven to be us. I think another tactic would be  
to show up where ever they are, like where they shop,  
for groceries or clothes where they buy gas. Different people  
but always some one they know, then when all are out  
have the jobs done. The harassment would drive ~~some~~ any  
one nuts if done right, and I think it could be done  
without getting in legal bounds.

I would be pleased to die but I would be  
willing & proud to do a job on anyone of them in  
what ever means necessary.

Thank You Dad.

Carol Dennis.

BB-31-a-113

Dad.

I think the one who murdered  
Cress Lewis should be  
Punish for life dieing is  
to easy they should have to  
Remember how it felt to  
know wheather they will live  
to see another day or die  
like they killed Cress that  
is to good. They should die  
slowly ~~so~~ and be Reminded  
every minute of how they did  
Cress.

Thank You Dad, Woods  
BB-31-a-114

Dad you ask the question, What we  
think about the Money Stone wanted

Cl Will said don't give him a god-  
dam thing i rather fight because my  
life don't mean anything to me, besides  
i am tire of the Sons of Bitches messing  
with you. i hope they die. i don't mind  
dying if i can carry some of the mother  
fucker with me. I wish you had let  
that Gucker die when he got shot. also  
the dirty M.F. over here that keep you  
up set. i wish you would let me wipe  
everyone ass what Fannie Jordan  
mess with you.

BB- 31-a-115

Dad. if we would give all  
Stone any money he would think  
of something maybe some way of  
getting John. Last night Don said  
something about writing him a letter  
asking him not to black mail us,  
if we would do this it would  
just show that we might be afraid  
they probably thinking that we want to  
anything about Christ, <sup>Death</sup> and everyone  
of them should be gotten for what  
they done to him. ~~After we~~ After we  
get our people out of the States.  
I would disclose myself. Wait  
until one of them is out on the streets  
at night shut them or burn their house  
or burn it down. ~~But they are~~  
~~thinking~~ Dad no way fucker like  
that should live all of them is long  
over due.

Barbara Smith

BA-31-a-116



Dear Dad I am writing you  
about Tim Stone. it seem to me  
He have forgotten where you have  
brought him from he his caught  
up in a world of his own Capitalist  
He don't give a damn I believe he  
is being Paid because all Lawyers  
Talk with one another and ask  
Question they make decision too no  
don't pay him anything he must  
pay the penalty for putting you through  
this shit because Capitalist will  
get him at the end

Sign Magdalen Lyles

BB-31-a-117

Dear Dad,

Tim Stone should be put to rest.

Living is too good for him.

If I had the chance I would shoot or  
beat him to death. That includes  
Tracy Stone also.

Thank you

Dad

Sign

Novella Sued

BB- 31-a - 118

Dear Dad,

I would torture Tim Stone by cut-  
ting him up into small pieces. But  
for now I would ignore him for now  
until the rest of our family is here.

Thank Dad

Fannie Ford

BB- 31-a - 119

Dear Dad,

I would not pay the white-mail money to him, because it would be an admission of guilt. We are not guilty of anything. My suggestion to get rid of Jim Stone is maybe there is some one in our family in the states that

BB-31-a-120

would be willing to "off-him" making  
it to look like an accident. I honestly  
can not say that I would do it voluntarily,  
because I would be afraid I would fuck up.  
But push come to shove I would. The best method  
I feel would be a fire.

Thank you Dad  
Vic Fongelle

BB-31-a-121

Strategy From Penny #1

Spooking Jim Steen: Jim could receive phone calls from men or women both at various places where he could receive messages. The caller could say they were looking for Attorney Jim Steen - And when they are asked who is calling, they can reply, "Chris Lewis." I would have a different person make this call each time. But I wouldn't call the same place twice as the police have a set up in which the calling line is tried up when a prank call is placed. Of course this would be o.k. from a pay phone if the caller wears gloves.

BB-31-a-122

#2

Story in Peoples Forum -

Headlines Transvestite Attempts

To Blackmail Jim Jones.  
(personally saved from brick life on streets.)

A story can be written ~~being~~  
touching upon what is happening  
but not naming Tim. Just  
telling enough to let him know  
we will tell it all. Then issues  
of the Forum - with personal  
stories about Nettles & others,  
still unnamed, can be dropped  
in their neighborhoods.

Assassination Team

I think an assassination  
team should be set up - I would  
like to volunteer to be on this  
team. I think the team should  
consist of men & women, Black &  
White. This group of people

BB-31-a-123

#3

Can infiltrate into the States - as couples & using other peoples passports, if necessary. (They rarely check passports w/ people).

If, however, a group of us were to go to the States for this purpose, doubles for us - could be set up here - or, we could travel under the name of someone here, to cause confusion. Better yet, with false I.D.S.

If six of us went - Say (example only) two women & four men - three Black & three whites. Two couples could go and the other two could travel as "friends." ~~They are~~

~~They are~~  
Being good at makeup & at changing my appearance, I could track down & pinpoint whoever we are trying to piss on.

The method of eliminating a person is by putting pressure on the main artery to the brain at

BB- 31-a-124

\*4  
the back of the neck. This would cause  
~~some~~ a condition which couldn't  
be detected as murder but would  
look like a weakening in the wall  
of the artery or brain hemorrhage.

Sebastian + I talked about  
going + we would like to go on this  
detail. He mentioned a large  
team - But large teams are harder  
to control.

With a permanent + makeup,  
I would look much younger, ~~like~~  
I also believe that Jim Stoen would  
communicate with me as he was  
very fascinated by my mind. He  
would always take the time to talk  
to me.

He wanted me to research  
~~Police~~ Police Chief Davis of L.A. so  
that we block his running for  
governor. He was also going to  
give me information about  
people in the DA's office so that  
I could put them on file.

He said that he wished  
he could see how I would react  
on a polygraph test because of  
my high intelligence. He told

BA 31-a-125



Andy once " Can you believe #5  
that of all the women in California,  
that she is the most intelligent?<sup>st</sup>  
When I felt low + worthless,  
I wanted to help - I thought that I  
could infiltrate these people +  
get shit on them + help. I still think  
I can do this. I believe that I can  
set up Tim for a piss team or piss  
on him myself. I can sure as hell  
locate him + all the others.

~~Letters About Tim~~  
~~Couples of different people~~

To different Editors, to Calif.  
State Bar, To the D.A. of  
each county in Calif., to  
the Disciples of Christ -  
The letters could be from  
a very upset woman - hand  
written - saying how Tim  
Steen sexually molested  
her child - and that she  
has witnesses - but that

BD-31-a-126

"As a Christian woman she  
doesn't want to let pose him  
"publically", she only wants  
to stop him from being in a  
position of hurting other  
children. She could say in  
the letter: "I never believed  
I would ever write an unsigned  
letter - but I am afraid of  
Tim Stoen -"

Lenny Silver

BB-31-a-127

Dec 20, 1977

Dad,  
Jim Stone, I believe is the one that set  
up the killing of our brother.  
So we are not willing to give up a  
damn dime.

Pearley Morris

BB-31-a-128

my Idea for.

Tim Stone I would not pay him a thing and said last night he always look weak to me I will say it not I never cared for him as Grace I did not know <sup>with</sup> the then I know now Dad not give him a thing I my self I will fight Socialism because I believe in it you have taught <sup>me</sup> it is Right and as I say if I have to give my life for Socialism I care a bout my self the system have just about Destoyed me any way Dad your are keeping me a live & you are the only one that gives me hope and new lease on life I will again <sup>son</sup> take a stand and fight for Jones town this is our land we are going to fight for it I dont know about the Rest of my comrades this is the way I ~~feel~~ feel I am not going to give my life for nothing I am going to take one of our enemies and Tim Stone on the head of my list.

Thank you Dad Elsie Ball

BS-31-a-129

JIM - I THINK THE STATE HAS HAD ITS EYES ON YOU  
SINCE YOU BECAME A COMMUNIST AT AGE 16. IT HAS  
STUDIED YOU THESE MANY YEARS AND IT WILL WANT TO  
CONTINUE TO DO SO AND NOT KILL YOU - THEY FEAR AN  
EGO LESS ~~THAT~~ UNIQUE PERSON - YOU - THEY MORE OFTEN  
THAN NOT CONCLUDE YOU ARE MORE BRILLIANT THAN THEM.  
THE STATE; I AGREE THE DISCUSSION, WANTS TO KEEP YOU  
CONFINED TO JONESTOWN AND WORRIED OVER MANY THINGS  
TO DIVERT YOU FROM USING YOUR SCRUPPLES TO EXPAND  
COMMUNIST FERTILE ~~GO~~ GROUNDS IN THE WESTERN HEMISPHERE.  
IF THEY PREVENT YOU FROM EXPANDING (AT THE SAME TIME  
STUDY YOU AND REACTION) INTO THEIR LAST AREA OF EXPLOITATION  
- THE SPICES AND RICHES OF THE CARIBBEAN - THEY WILL HAVE  
PROLONGED THEIR ECONOMIC STABILITY AND THE U.S. LIFE.  
THE STATE AND INTERPOL AND TREPA AND THESE OTHER NAZIS  
AND KKK MAY WELL THINK THAT OUR OWN WILL DO US IN -  
THE ~~STATE~~ DENNIS ORDE DENNISGS AND ANARCHISTS & THAT  
WE KNOW OF - THEY AND THE STONES + MERTLES AND SUCH MAY  
BET THAT THE PROLETARIAT CANNOT BECOME UN-AMERICANIZED  
/ THEY MAY BET AS TIME GOES ON THERE WILL BE MORE TRAITERS  
AND MORE INTENSE ANARCHISTS.  
/ I AGREE THAT WE MUST SEARCH FOR TREASON AND SURFACING  
ANARCHY - I THINK WE DO THIS WITHOUT OUR CHILDREN'S KNOWLEDGE  
I THINK IF THEY STATE KILLS YOU - THEY KNOW THEY WILL  
HAVE US AND RUSSIA TO DEAL WITH LEADING TO ~~THE~~ NUCLEAR  
CONFRONTATION  
- RE: TIMSTONE / WE SHOULD DESTROY HIS LIVING  
QUARTERS OVER AND OVER AGAIN SINCE WE  
BB-31-a-130 (W OVER)

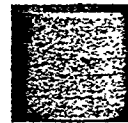
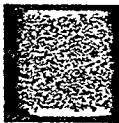
CONCLUDE HE IS NOT BEING PAID TOO MUCH MONEY  
AND CANT FIND A JOB BUT THAT MAY BE A TEMPORARY  
MEASURE TO SHUT HIM UP IF INDEED HE HASNT AL-  
READY TURNED 'STATES EVIDENCE" - ANYWAY NO  
BLACKMAIL UNDER NO CIRCUMSTANCES - OUR MONIES ARE  
THE PEOPLES AND WE SHOULD (IF WE HAVEN'T) MAKE CONCRETE  
PLANS FOR OUR MONIES ~~FOR~~ AND SUPPLIES TO GO TO CUBA  
IF OUR BLOOD IS SHED / REALISTICALLY I THINK OUR  
CHILDREN SHOULD 'GO WHEN WE GO'. THERE IS NO HIGHER LEVEL  
OF LIFE THAN HERE IN JONESTOWN SO WHY SHOULD WE, IN ATTACK, SEND  
OUR KIDS INTO HIDING TO SURVIVE ONLY TO LIVE A SECOND BEST  
OR TURN ABOUT CAPITALISTIC ~~THE~~ LIFE. AFTER WE ARE DEAD  
- RE: THAT VERTON, STONE, IF HE TRIES TO STOP OUR STATE-SIDE  
PEOPLE / THEN WE CAN TAIL HIM - ONE OF US GET CLOSE ENOUGH TO  
BAY JUMP IN HIS CAR OR GET HIM ALONE IN HIS LIVING QUARTERS  
AND DEMAND THAT HE CALL DIFFERENT PEOPLE OR PLACES TO  
REVERSE WHAT HE HAS DONE (THE ONE OF US WITH HIM WOULD HAVE  
DYNAMITE STRIPPED TO BODY + THREATEN TO IGNITE IT.)  
-STEVE address

RE: Strategy in DC  
1982/83

FROM Stephen address

TO JIM

31-a-131



TO DAD  
FROM PETER W.  
RE: TIM STON

STRATEGY

Tim has blown it for himself  
with his latest confession. I  
think as he realizes his predic-  
ament he will make radical  
moves one way or another.  
He will probably try in every  
way possible to prostitute himself  
to the conspiracy for money. He  
is finished where he is and needs  
money to begin anew elsewhere.  
If he fails he may try to  
make amends to us, and  
failing in that he may flip  
out and do something crazy.  
I think he's a coward and  
would have to go off his  
mental shanty to turn up in  
Guyana or do himself in  
(over) →

BB-31-a-132

He may in his frustration  
turn hostile and nasty AND  
obsessed with our destruction  
as to try and attack, frame  
and otherwise harass our  
people in San Francisco.  
I don't know how dangerous  
a disgraced lawyer can be,  
but I think he should be  
watched closely if possible.  
He is UNSTABLE AND AS SUCH  
we should be on guard for  
some insane move on his  
part.

THANKS DAD

Peter W.

BD-37-a-133



To, Dad  
From Candace J. Ingram  
Date: 20, Oct. 1977  
Re: Stoen

BO-31-a-134

I feel that I would kill him or anyone else  
for this cause if they have done anything to hurt  
or destroy this socialist family. If I could just  
be shown the way to do it. Even if it was by getting  
them in the jugular vein or stabbing him or  
even plain poisoning. Just whatever means I had  
to do it. But if he came over here I would  
murder him with cutlass in hand. Because  
he has been here before and knows the beauty of

this place and to go back to fascist grave  
America is treasonous so I would be willing  
to kill Tim Stoen or even Richard Cordell and  
Harold also! If he keeps up shit. As I saw  
his little parables in Cindy's page letter he  
wrote of negative thinking!

Thank You Dad!

Candace Ingram

BA-31-a-135

TOS WRITE UPS

Don Fields - Suggests we use cloak and dagger CIA tactics, have Stoen found dead from natural causes, said if this was done a few times those mouthing off would stop.

Cleve Swinney - thinks Stoen is trying to keep a foot in the door, we shouldn't give him anything. Says he doesn't want to go back but if it was to help make peace "any way at any time".

Barbara Walker - feels Stoen is being backed by conspiracy in this, doesn't have guts to do it on his own. Doesn't think he has anything on us that hasn't already been used. Thinks they are trying to get you back in the states, thinks we just ignore Stoen and call his bluff.

Lena Benton - Thinks TOS should be shot or "put through hell" Says she is ready to give her life, just let them face the gun and give them no money. Says they are like bird dogs, and if we give to Stoen he will never stop.

Jack Barron - Suggest many of us write TOS, address him as "Brother James" and ask him if he wants his "30 pieces of silver". Says there might be loss of face to his CIA supporters when trying to answer these queries.

Cardell Neal - Says since we are portrayed as mafia, act like mafia. Send bomb to one of companies involved in conspiracy, and from this Stoen will know this is a threat. Thinks he will back off if he sees this, and then says kill him.

Theresa King - (very good, shows detail, some sincere thinking) Theresa's is a very long write up, but basically what she is offering to do is set up herself as an escapee from PT by going to American Embassy in G'town. She goes back to states, gets job at Kepplers book store, contacts Gary Lambrev through his parents. She gets into lover/sexual relationship with him, acts out jealous role of his male lovers, and starts leaving sick poems in key places. Then offers to give info. on PT, and for Gary to arrange meeting w/ Grace, TOS, and all. Then she would blow herself and them up in this meeting. Also says she could be ripping off books from Kepplers and depositing them at a false company front for our library. Says she feels guilty about her alliance with Gary, Liz, and Joyce Shaw - that she probably deserves to be here less than some of our brave brothers and sisters back in the states, and this is her way to pay back her debt to you for giving her a taste of liberation.

Ray Jones - Opposed to paying TOS anything. Says we should move our prime targets for frame up into hiding. Says he will meet Stoen anywhere and kill him for what he's done. Wonders if we can use Mafia contact we had. Again says he is willing to kill for the cause.

Barbara Cordell - says Chris was done in because Mertles Stoens afraid what Chris would do to them. Says we should have some of our people, different ones daily, walk up and look the enemy in "straight in the eye." She doesn't think they are sleeping to well right now.

Ron Sines - Would be glad to be involved in any plan to stop a conspirator, says we should plan a burglary or mugging around their assassination to take some of the heat off of us, and serve as warning to other conspirators.

BB- 31-a-136

Ameal Staten - "Tim Stoen told you a lie to go back to the states. He was afraid to do what he is doing now because he knew my brother would have killed him. So I no ge got him out of the way because he would ~~kill~~ black-mail the family.

Lisa Layton - \* Suggests we put a large ad in a gay paper where TOS is living welcoming him to gay community. Thinks it would louse up his rep and scare him, Otherwise ignore him.

Ruby Carroll - Suggests getting some outsiders to do different things, such as breaking into Tim's home, beating TOS and Grace up, fixing the brakes on their car, having their car catch on fire a little to scare them. Suggested Russell Jones get Chris's old addict friends to pay TOS a visit, or Joann Carroll to do same and beat the shitout of him. Offers to go back herself and thanks you for 3 mos of peace, but won't promise anything won't happen to the traitors. Offers to "cook" for Tim if he comes over to visit.

Gloria Carter - Thinks Stoen is taking orders from higher up in conspiracy. Thinks they're trying to weaken us through this, won't stop with small sum of money and we should not give him anything. Says she's ~~swi~~ willing to do whatever necessary to stop them, and if they stop Mother and comrades in states we should move as a group to fight for them. Maybe put them on notice through PF we will ~~not~~ be intimidated.

Peter Wotherspoon - Thinks Stoen asking for modest amount shows: he's financially poor, gambling he'll get smaller amount, wants to leave SF cause he can't ~~get~~ a job, baiting us for verbal or written response to use against us. Says we shouldn't yield to any of his demands, and that he would be willing to return to US to kill by whatever means, and then himself.

Bonnie Simon - Says we shouldn't give him ~~any~~ anything but a bullet. Says she is ~~is~~ happy she made it here, and knows her children will have a future, and with that in mind would gladly go back to states and kill traitors and then herself. Would be glad to give her life for you, for socialism, and for our brothers and sisters in the states.

DeeDee Macon - Says out of this family of ex-cons should be 1 or 2 that could be trusted to go back to kill Stoen. Suggests we cut him in half length wise and send  $\frac{1}{2}$  to Grace and  $\frac{1}{2}$  to Mertles. Would be willing to go over, even if it meant death.

Margarita Romano - Thinks we should expose Tim in last issue of Peoples Forum. Says our people back there would have to be in position free from harassment or kidnaping.

Mary Wotherspoon - Thinks Stoen thinks our right arm has been knocked off in Chris, and wants to see if you will bend. Thinks we should make him ~~is~~ paranoid and make him think he is going crazy. Also suggests that we smear him, to ruin his reputation. Give him no money. Also suggest making Stoen look like he is really with us, to make the other traitors mistrust him.

Dianne Lundquist - Says traitors should all be killed, would be willing to get in meeting with them and kill or as many as she could. Maybe carry an explosive device on her body.

Jim Pugh - says to count on him in solo or consort in the elimination of Stoen. His preference is a hand-gun ~~x~~ or rifle, or blow up whole conspiracy if we could find a meeting ~~place~~ place.

Mary Tschetter - doesn't think Stoen is interested in money. Thinks he might be suicidal and force us into killing him so he would be out of his mess, don't give him any money, and that he's lived ~~is~~ too long.

BB- 31-a-137

Phyllis Chaikin - says Stoen's achilles heel is his drunk narcissism and drive to be around people of power. Says she remembers in RV he was willing to risk his image with you and blabbed to a reporter because he flattered him. Said when he met Gene's brother he couldn't be himself but threw his medals around. Says she hates the mf, and would participate in whatever way useful. Thinks the natural way for him to go would be at some fancy function and Finkles friends passing him a poisoned canope.

Nat Swaney - Says to knock Tim Stoen off, and that they think they have us over a barrell because Chris was killed. Said he will do it.

Dianne McKnight - thinks Stoen sold out before he left Jonestown, that he wanted Grace back but it didn't work, and now has no money to go anywhere. Wants to get out of area because of Teddy Bears death. Thinks we should ignore him, his own conscience will fuck him up. Thinks the law will try to hold us responsible.

Tom Kice - Thinks someone should go back as if they left the church, and would give information to use against church, get them in a meeting, and kill them all. Says he is willing to do this, and would like to be killed himself rather than be arrested and taking a chance of saying the wrong thing and causing more trouble.

Nedra Yates - write him a dear John letter and on the return envelope coat it with poison. Suggests to get TOS and Grace and all into one place and make herself a human bomb. Als suggests to just let him come over in January, take him to the jungle, and make him disappear.

Millie Cunningham - says keep the money and send him a bomb. says you have done so much for people and all they do is act up.

Billy Oliver - feels there should be no money given because it is part of the conspiracy and they are devoted to destroying us no matter what. Thinks he should be confronted face to face because he values money more than his life, and he can be reached because he's weak. Is willing to do anything for cause. Says he could go back under false image of his parents wanting him back. Also offers to have someone use prepaid ticket his parents sent to go back. Feels there should be alot of planning to not keep our people from coming over. Worried it might be easily traced to peoples Temple. Also thought of Hanafi muslim in Washington D.C. and what he did.

Laura Johnstons - Says she has fucked up with following thru with responsibilities, but would love to be able to do one thing right - drive a car off a cliff with Tim and any of the other traitors she could take. Or carry an explosive into a group of them, without implicating the group. Is more than willing to do it. Says she has fear, preferences, and many faults but death offers her things she wants so she doesn't see herself falling short of any instruction in that area.

Bea Brsot - says he will remain strong in their favor as long as he's there. suggests we kidnap him, make him talk, and find out what we need to know. Says to de-program him, and "supper" him later. Keep confidential, general public could never know. Thinks he may be trying to get the law here to divide us from Burnham. suggest stationing people in nearby countries to watch for personalities connected w/ conspiracy. Also suggest kidnapping Mazor, and giving same treatment as Stoen.

Lura Bucklew - says we shouldn't give Tim Stoen a penny. Thinks we should let him know if he does anything to keep our people from getting here he will be a dead man. She is willing to do whatever to Tim or any of them.

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Mark Sly - "First have John Doe change his name to Joe blow. Then send him to another country to become a citizen, and get a passport. Then he comes back to Jonestown and has an accident and dies as John Doe. Then Joe Blow goes to the US and takes care of Tim Stoen or anyone else.

Patsy Johnson - Is willing to kill anyone, anyplace, even if it means her life or going to prison, she doesn't give a damn. Thinks Stoen may be asking for this amount of money knowing it is needed to get our people over here. She says fuck life, its hard as hell to live. Thinks Stoen could be pressured into his sexual acting out through phone calls, not saying anything, just harassing. When he was "driven crazy" from these calls he might go to a bar, where anything could be done. He could be given a mickey, or slipped a hallucinogenic. We could get him to flip out with acid, or angel dust. Mentions fixing it up so he's in a car wreck, or possibly run him off the road. Possibly be watched and attacked and stabbed from behind. Suggest shooting him full of heroin and making it look like an OD. Also mentions a bomb underneath his car. ~~ik~~ Offers to do any of these things

Rosa Keaton - Suggest people meditate at 6am and 6pm on the thought "Father, vengeance is yours, you will repay." Says we should do this to people who killed Chris.

Annie McGowan - Says don't give him a damn thing, and to meditate so your power can strike him down.

Linda Arterberry - Says we should make up some Christmas candy to sell, and have poison in the candy, and pretend we are selling it door to door and give some to Stoen. Also suggests placing bomb in his door when he is not at home and then when he came home would be blown up.

BB- 31-a-139

TIMOTHY O. STOEN  
ATTORNEY AT LAW  
POST OFFICE BOX 893  
Georgetown, Guyana  
South America

10 May 1977

Honorable Alan Cranston  
Honorable S. I. Hayakawa  
Commission on Federal Appointments  
in California  
United States Senate  
450 Golden Gate Avenue  
San Francisco, California

Re: Daniel H. Weinstein

Dear Sirs:

I am writing as a former deputy district attorney for the City and County of San Francisco to give you my views of Daniel H. Weinstein, who is being considered by your commission for recommendation as United States Attorney for the Northern District of California. I was hired by District Attorney Joseph Freitas to handle specially the Voter Fraud prosecutions, and resigned from the office in February of this year, when that assignment was substantially completed, in order to handle the international legal affairs of a large-scale agricultural development in the third world. This letter comes completely unsolicited.

By way of background, I have a J.D. degree from Stanford, have been in private practice, have served as the legal adviser to a board of supervisors, and have worked as a prosecuting attorney in two offices. I have been active on committees of the California State Bar, and currently serve, pursuant to gubernatorial appointment, on the California Advisory Council to the Legal Services Corporation. I happen to be a registered Republican.

I am very much concerned that the prestigious and powerful office of U.S. Attorney be held by someone with experience and a measureable track record in two areas of central importance: the supervising of a prosecutorial office and the discretionary selecting of cases to be filed. It is because of my first-hand observation of Mr. Weinstein's performance in these two areas that I make this appeal that your commission recommend him to President Carter for United States Attorney.

The direct supervision and management of day-to-day operations of the San Francisco District Attorney's office has been the responsibility of Mr. Weinstein. He has, in my opinion, achieved marked successes in the recruitment of high-quality trial attorneys, the establishment of valuable in-service training, and the intelligent handling of personnel.

BS-31-a-140

matters. In recruiting, he has shown a fine ability to recognize lawyers of talent and to persuade them to leave positions far more lucrative to join his office. He has brought into the office women lawyers and minority lawyers of excellent abilities and presence. There is no question but that the professionalism of the San Francisco D. A.'s office is noticeably greater today than it was when Mr. Weinstein came 16 months or so ago.

Mr. Weinstein has established the in-service training of prosecuting attorneys on a solid basis where previously there was little or none. This includes mandatory weekly sessions on new cases and specialized problems for all attorneys not in trial, and extended orientation sessions for all new prosecutors. A first-rate felony prosecutor has been brought in to coordinate these training programs. Police personnel are instructed regularly on matters ranging from arrest procedure to report writing, which exemplifies an attention to detail characteristic of sound leadership. Mr. Weinstein also treats advocacy as a separate subject and art form, whose lessons the serious prosecutor is obligated to study and internalize.

I have also observed Mr. Weinstein handle both routine and sensitive personnel matters with a firm hand yet open mind. He seems to be an intrinsically fair person, who hears out all persons affected. He treats the clerical people with dignity and fellow lawyers with empathy. Yet there is always, it seems, present in him that special respect for the prosecutorial function as an institution, one deserving of society's most profound respect. This feeling was probably accentuated by his years at a national law school like Harvard and as a federal deputy public defender.

Then there is the matter of how a criminal case should be selected for indictment, i.e., the types of cases and the types of defendants. Mr. Weinstein has assisted in creating in the San Francisco District Attorneys office one of the nation's most outstanding consumer fraud units. He is currently establishing a Special Prosecution Unit to deal with organized crime and public corruption. In my opinion, this is indicative of his willingness to enforce all laws which the legislature has enacted to protect the public, not simply those traditionally enforced. Because of personnel limitations, not all violations of law can be prosecuted, and therefore those that are should be chosen with a seasoned, mature judgment with a conscious view towards enhancing the criminal justice system as a whole. Mr. Weinstein, to my mind, has such judgment.

Once a chief prosecutor establishes his policy as to the types of cases to be handled, the question of integrity assumes paramount importance. He must be resolute to avoid showing favoritism based on personal or political allegiance. Moreover, he must not be afraid to prosecute the powerful and the vengeful. Speaking from my experience as a voter fraud prosecutor, I can truthfully say that at no time was I asked by Mr. Weinstein to ease up or go slow on suspects who could harm him politically or otherwise. At the beginning of these prosecutions, it appeared that a certain very powerful San Francisco figure who was also

BB-31-a-141



a close personal friend of the Weinstein family may have violated the election residency laws. Mr. Weinstein made it a point to press upon me the obligation of a prosecutor to avoid even the appearance of favoritism, and insisted that this suspect be investigated promptly and thoroughly, and that a felony be charged if the evidence justified such under the same standards as applied to all other voter fraud suspects. The press was not aware of the aforesaid suspect, so Mr. Weinstein was not, in my opinion, playing to the gallery. Although our investigation was exonerative, the conduct of Mr. Weinstein in this matter is what caused me really to respect and believe in him.

In conclusion, I think that Mr. Weinstein has a rare feel for the law as a craft, and that he has as keen a set of ratiocinative powers as any you will find at the prosecutorial bar. Mr. Weinstein would, in my opinion, bring considerable credit to your good judgment if you decide to recommend him. He has the potential to be even a great United States Attorney.

Please be so kind as to make known this endorsement of Mr. Weinstein to each member of your commission. Thank you.

Sincerely,

*Timothy C. Stoen*

Timothy C. Stoen

cc: President Jimmy Carter

BA-31-a-142

February 3, 1978

Dear Judge Bishop,

I am a bit upset. I am sending you this paper that Grace Stoen wrote but she and Tim Stoen were deceived at the time by their total lack of belief in some sort of deity and by socialism, especially Grace.

Peoples Temple are anti-Christ deceivers and this paper means nothing. As I said before Grace Stoen was totally deceived when she wrote this paper.

Due to the nature of this, I prefer to remain anonymous.

Yours truly, in the blood of Christ,

- papers included were the:  
paper TIM wrote about Grace  
being unfit & the one that Grace  
wrote about TIM being a transvestite.

BB-31-a-143

This was typed  
in (with the same  
type writer)  
↓

And one TIM  
Stoen wrote

# THE INDIANAPOLIS STAR

EDITORIAL ROOMS

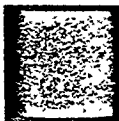
Sept. 12, 1972

Dear Les:

Enclosed is another article I discovered after dispatching first one. I've checked and State Board of Psychology Examiners secured legal opinion from Ind. Attorney General which said they had no cause to prosecute because Jones didn't use the ~~title~~ title "psychologist". State medical people say they're handcuffed because no state laws authorizing prosecution against "faith healers." Dr. Reilly, mentioned in enclosed clipping, said yesterday Stoen had made personal visit to her here after this story appeared, pleading Jones' cause and asking that psychology board abandon any thoughts of prosecution. She said she's had no further word from Stoen, other than a prediction by him--at the time of his visit--that it was "unlikely" Jones would return to Indianapolis to preach. I'll keep in touch---

*Carole* \_\_\_\_\_

BB- 31-a-144



MOVING QUOTE  
HEREOF AND  
5.3/4/2/141



Ministry of Home Affairs  
6, Brickdam  
Georgetown,  
Guyana.



28 December, 1977

Dear Comrade,

I wish to refer to your letter dated 24th November, 1977, and to inform you that the Comrade Minister has given approval for the permanent residence of Timothy Oliver Stoen to be revoked consequent on his no longer being a member of the Peoples' Temple Agricultural Mission.

Yours co-operatively,  
*M. St. Hill*  
M. St. Hill  
for Permanent Secretary

The Secretary,  
Peoples' Temple  
Agricultural Mission,  
P.O. Box 893,  
Georgetown.

BB- 31-a-145

Peoples Temple Agricultural Project  
121 Third Street  
Alberttown, Georgetown  
6 April 1977

Dr. The Hon. Franklin Eleazer Hope, M. P.  
Minister of Finance  
Main and Urquhart Streets  
Georgetown, Guyana

Re: Foreign Accounts held by Individual Members of Peoples Temple

Dear Cde. Minister:

Bishop Jones and all the members of Peoples Temple are most appreciative of your assistance in authorizing our organization to hold monies in a U.S. dollar account in Guyana. We are now requesting your authorization for our individual immigrant members who have individual bank accounts in the United States and other nations to continue to maintain said accounts upon the express condition that no monies which are earned in Guyana may be removed to such foreign account.

As you know we are undertaking an expensive mass movement of several hundreds of people to Guyana from the United States. More people will be coming in gradually after the initial mass moves as they get their personal business settled. Naturally if there were some immediate threat of fascism, a larger number of these people would want to come sooner. All of the group are very good people and non has come before a court of law. In fact, even a very conservative supervisor acknowledged that we are a very law abiding group, which is mentioned in the attached article from the Bay Guardian entitled "Peoples Temple": Where activist politics meets old-fashioned charity" All of these people intend to become permanent residents of Guyana. Many, however, have mortgages and other financial obligations they must continue to honor after they have arrived in Guyana. In addition, some of the people have made financial commitments to support certain causes in the United States such as the Chilean refugees and the American Indian Movement.

Specifically, therefore, we are asking that you supply us with a letter from yourself as Minister of Finance authorizing Peoples Temple members, while residents of Guyana to hold bank accounts outside Guyana provided that no such person shall remove any monies or valuables from Guyana to any such account.

Again, let me express our deep appreciation for your expeditious and gracious help thus far. We are very much impressed by the high efficiency and quality of your Ministry.

Cooperatively yours,

*Timothy O. Stoen*  
Timothy O. Stoen  
Secretary, Peoples Temple  
Agricultural Project

BB- 31-a-146

from June

Notes from meeting with Garry: Jean B, June C, Jim McElvane  
5/18/78

Re TOS libel suit:

Garry's comments:

"It's bad enough to quote Maria, but when you say "we know it's true", that's bad. To accuse someone of a crime is libel per se. We're not only repeating what Maria has said in describing her dad's molestation of her, we've taken it upon ourselves to judge. How do we know it's true? No witness..It's his word against our word."

This gets us into a malice situation, by our publishing the statement - shows intent of malice, which is why TOS seeks punitive damages.

The libel suit opens a "pandoras box for demanding our financial records." But they have to win in court before they can tie up our assets.

Garry sees a conflict of interest in TOS having been attorney for P.T. and then turning around and suing us. TOS will argue this is separate, has nothing to do with what he was privy to when he was our attorney.

The corporation should deny complicity with the statements issued in the releases, with Ingram or any other party being spokesperson for the group. They spoke of themselves only, not on behalf of P.T.

Garry ~~will~~ sees further down along the road, once we get served and are in the suit, trying to get venue changed to SF, not Mendocino County where it was filed; he is considering putting TOS on stand under voir dire -inquiring as to TOS's state of mind, ability to speak - but this ~~is~~ is limited cross-examination - just one possible tactic of many which ~~we~~ he will consider along the way.

Right now he wants IMMEDIATELY in detail Mari's description of Katsaris's sexual molestation of her - when, where, how, how many times, any witnesses, why did she wait so long to tell of it, was she afraid of retaliation, embarrassment, what was her reason for telling it at all, every specific ~~extenuating~~ description possible.

He says Sandy Ingram should not attend any public functions, including services here, and that she definitely should not be around to accept service. He is worried about her statement to the Press Democrat that "we know it's true"...

Re L.A. asian case: A.G. has requested extension of time to file opening brief  
Re Paternity blood tests by UC doctor: the child has to be present as 1 month.  
well as all parties. But he gave permission to write to the doctor and ask if these tests can be conducted out of the country.

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TIM STOEN: *chameleon*

I. Staunch anti-Communist - Christian - Rotarian

1960 Wheaton College (Illinois) graduate

1961-62 Rotary Foundation Graduate Fellowship

1962 Trip to East Germany, ". . . to see what it is like behind the iron curtain".

"I saw . . . what a police state can do to individual human beings . . . the most startling and disconcerting experience of my life."

"The restrictions of a communist state are as bad as you read about . . ."

"It is extremely difficult to have an underground spying system because you can't trust anybody."

"But when you see what people like you and I have to go through. They just want one thing. They want freedom to think and act as they see fit."

All I can do is anguish about the problem and pray to God that it won't last forever.

1962 Address to Rotary Club: "The first thing I noticed was the blank expressions on the faces of everyone. You could tell they were just waiting for the day they might have some freedom."

"Fifteen hours in Communist hands."

"Stoen had a happier experience in West Germany . . . a little old lady recognized him as an American. She told me that she loved Americans for the kindness she received from them at the close of World War II."

1965-67 Prosecutor - Deputy District Attorney

II Conversion to Socialism

1970-76 Joins Peoples Temple - a socialist collective in Redwood Valley. Served as chief legal counsel to Rev. James Jones, a marxist and outspoken critic of inequities and injustices within the United States as well as throughout the world. Tim Stoen advocates concepts of extreme revolutionary orientation, beyond the limits of humanitarian socialism practised by Temple members as taught by Rev. Jones. Serves as Deputy District Attorney in Mendocino County, and maintains membership in several social reform programs - - ACLU, NAACP, Legal Aid and Defense Association.

1976-77 Turning again to former conservatism

Moves to San Francisco to take on the job of prosecuting alleged voter fraud, mainly aimed at Delancey Street foundation, a progressive prisoner rehabilitation movement which has been politically progressive.

1977 Takes up prosecution of chicano truck drivers union members. Called to South America by Rev. Jones To help establish Guyana project, thus never completing his surprising new project.

August, 1977 Stoen returns from South America to "set the record straight" on allegations that he was afraid of Jim Jones. While no longer a member of the organization, he makes clear "I have always made known my esteem for Jim Jones." Claimed he was suing New West and Mendocino Grapevine for slander, that he intended to set up law practice in Ukiah, and establish an organization of "idealistic young lawyers" to fight for the rights of the religiously persecuted. He has "worked with the U.S. legal system long enough to trust it" and states, "I'll put my trust in the system". Steals a line from Charles Garry, "I'm a streetfighter. Someday people will come to appreciate that I'm a streetfighter." At this point, his beliefs are still allegedly

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"closely linked with those of Rev. Jim Jones."

Feb. 1978 Stoen claims he is forced to a head-on collision with a man he highly respects because he has decided to claim paternity to John Victor and to represent his ex-wife in efforts to take John Victor from his natural father, Jim Jones. Stoen explains why he signed documents admitting Rev. Jones' paternity: claims it was an "act of faith" to show that he was a good follower. His opinion at the time, he says, was that the documents would be ineffective in a court of law. At this point, he claims that this one custody case is his only quarrel with a great man, Jim Jones.

April 1978 Forms a small band of followers which he calls "Concerned Relatives" most of whom are former members with no relatives in Guyana. Runs the organization out of his Montgomery Street law office. Leads this little band in a demonstration to the door of San Francisco Peoples Temple to hand over a petition alleging human rights abuses. Later the same month leads the same band on a demonstration in Los Angeles. Now he is accusing Rev. Jones of every conceivable kind of crime, but with no facts, no evidence to back his claim. He is in association with people who, according to the owner of the Ukiah Daily Journal, are threatening to "hire mercenary soldiers to raid Jonestown by force." He has filed three lawsuits against the Temple. One is representing a couple who told their niece in Guyana that "You ought to all be killed. Every one of you."

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Submitted to Garry 7/3/78

TOS - involvement with members of PT etc.

Jim Randolph: During a time when his job was in jeopardy (he worked as a social worker for the Mendocino County Welfare Department), Tim Stoen, then Assistant District Attorney for the county, took it on himself to speak to the Welfare Department director on behalf of Jim Randolph. ~~There is a record of this conversation in the files of the Mendocino County Sheriff's Department.~~ Tim Stoen subsequently told Jim Randolph that the director, Dennis R. Denny, had threatened to get Stoen's job in retaliation. It is known to Jim Randolph and others that on at least two separate occasions Mr. Denny had tried to get Randolph's job.

In a bragging manner Tim Stoen told Jim Randolph that he had answered Denny's threat with words to the effect that if he (Denny) tried to get Stoen's job, Stoen would "sue him once a month for the rest of his life." He also remembers Stoen saying he had told Denny, "You know that I can do it."

Party X: There are several people who know decisively that Tim Stoen gave Party X instructions to proceed with a major money transaction and claimed that the instructions were directly from the Office. The Office did not know anything about the instructions Stoen had given. The directions were outrageous and eventually led Party X to jail.

There are a number of people who know that TOS sent a threatening letter to his wife, Grace Stoen.

(from Feb-Oct 1975)

Phyllis Houston was advised by Tim Stoen to use her position as dispatcher in the Mendocino County Sheriff's Department to "get rid of" tape recordings that he wanted off the record. She could not erase the tapes but did arrange the designated dates' recordings so they would 1) be out of filing order and 2) be in sequence to be automatically erased for reuse by the office.

David Smith: Tim Stoen advised David Smith NOT to pay his federal income taxes.

Sandra Bradshaw was advised by TOS to actually hide Jack Arnold Beam when the sheriff's deputy came to the Redwood Valley Center to pick him up for questioning in a child abuse charge. Ms. Bradshaw did as Stoen asked and took Beam into a small office in the complex for the sole purpose of hiding him from the authorities. She acted on instructions from Stoen whom she had called at his D.A.'s office. After she had hidden Beam she went back out to talk to the Sheriff's deputy because she worked with the deputies in the Probation Department where she was employed and knew they would tend to believe her story that Beam was not in the building.

Phyllis Houston was told by Stoen to look at the sheriff's report on the above incident and report the contents directly to him. She read the report and as she recalls she relayed the contents directly to Stoen in his office.

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Stoen advised all members of Peoples Temple who possessed any kind of handgun, rifles, shotguns and ammunition to turn them in directly to him and he stored all that was surrendered to him in his own home. There were several hundred guns in his keeping.

Sandra Bradshaw was advised, along with Jack Arnold Beam, Jack Beam Sr., Mike Prokes, Gene Chaikin, Harold Cordell, Rick Cordell, to get ~~gun~~ licenses to carry handguns by Tim Stoen.

Stoen used his office to order a copy of the "Anarchist's Cookbook" which is a well-known, how-to-do book in the planning and operation of terrorist activities. He got it with the express purpose of directing the Temple members into this kind of activity. He gave the book to Bonnie Beck when he received it, *recommending to her to read the part about making explosives. He sent her to Santa Rosa to Kerox the book for him.* Phyllis Houston was advised by Tim Stoen to look into records of complaints about any kinds of activities perpetrated against Peoples Temple by members of the community. She did this whenever he asked and reported the contents of confidential sheriff's department files to him directly.

BB- 31-a-151

Outrageous things that Stoen suggested.

1. When I first came to the church Stoen wanted me to join the sheriff's department. He used your name in trying to get me to join. His reason being that I could infiltrate the police, carry a gun, and be licensed to do so while also keeping tabs on the police. He wanted me to sign up as soon as I turned 21 which I did. However--- I never followed through with it and when I checked with you as to whether I really had to do it or not you seemed unaware of the whole thing.
2. That same year, Stoen suggested that I change my major from pre-med to chemistry when I went back to school. He suggested that I move into an apt in SF with Tom and have a back room where we would make bombs. He wanted Tom to drop out of school and work for a pharmacy thus enabling Tom to steal the needed supplies for bombs.
3. It was Tim who brought up the idea of poisoning a major city as a revolutionary tactic. I don't know if he ever discussed this with you but what was to have happened was that he wanted to clear with you the possibility of having Mac study the layout of Washington DC and the rest of us research poisons that would be appropriate to poison a massive population.
4. It was Stoen who recommended getting Kinsolving by coming up behind him and tying a burlap bag over his head and beating him to a pulp.
5. It was Stoen who did that whole layout for the money.
6. It was Stoen who gave me which numbers in the DA's and police could be called without risk of being taped.
7. In the Delancy street voter fraud cases and the voter fraud cases in general he steered away from the big money holders and did not hit the big fish.
8. Instructed the stealing of tapes out of northern California police department.
9. Tom Stoen told the federal government that his passport was lost when indeed that was not the case.
- 10.

BB-31-a-152

OPERATION MOLLY

E.K.A. How to deliver her over:

BB-31-a-153

Goal: Win Molly

Means

1) Spirit (Attitudes, emotion)

2) form

a) appearance

- ① grooming - hair, hair, cologne, perfume, etc.
- ② posture - moving, sitting
- ③ dress - self aware, elegant, attractive
- ④ clothes - practical, clean, fit well, iron
- ⑤ facial expression - pleasant, not self-conscious, relaxed
- ⑥ skin - keep clean, rub cream
- ⑦ simple definition - left wrist
- ⑧ ~~self~~ self assurance voice

Non-verbal

b) actions meticulously proper technique

- ① driving - smooth, enterprising, politeness
- ② walking together - arm, hand-off
- ③ eating - nice pat
- ④ on telephone - prepare, when you drop
- ⑤ entering public place - nice pat
- ⑥ meeting - have time worked out
- ⑦ departing - kiss, wave, or please - technique
- ⑧ conversation - pro-include
- ⑨ dancing - long-range

c) talking

- ① subjects discussed
- ② give and take
- ③ ~~little bit~~ compliments
- ④ orienting subjects around her
- ⑤ quality of voice
  - a) seducing
  - b) soothing
  - c) commanding
  - d) nonchalant

topics pre-organized

① recent events & what change  
 ② future - char. traits, how, behavior, number  
 move to ser- get someone put  
 food eating - get at personal first  
 San Francisco academic research  
 Horvitz theory curriculum  
 purpose of life quality  
 purpose to each as individuals  
 university work  
 her projects (read a book, get in  
 your - the work)

1) 1/2

- ① meeting
- ② eating
- ③ talking

Spirit

her characteristics

- ① very self-assured - must match it
- ② very independent - must credit it
- ③ very attractive future - must credit it

topics to meet

- ① more self-assured - knowledgeably, books
- ② more independent - ie nonchalant
- ③ inherently agreeable to have around party, relaxed
- ④ personal future <sup>more</sup> attractive (definite)
- ⑤ extraordinary abilities
  - a) investigations - poetry
  - b) political awareness -
- ⑥ her to serve as inspiration  
 - write poems to her [but wait for input grand work]

Kindly relevant rules

- ① discuss self <sup>at</sup> all -  
 appear mysterious, nonchalant, innuendoes & most
- ② ~~do~~ never fail to exude strength  
 know your own mind - be a top endashyptic every situation
- ③ compliment in talk, ~~withholding~~, acting  
 - in everyday body someone - meet her

limitations

① time - June 1

# meetings

- a) Dublin + max - April 15 X - critical
- b) April 29 or so - visit hoodie

c) may  
d) mid 26 - E. visit date

② development

~~studies~~ files for form all activities study  
 to Ymer - women encounter  
 list  
 ① esp. etiquette  
 ② esp. L E V M S K  
 ③ list

Creation M

- ① list - Etq on <sup>rich + conversation</sup>
- ② 2nd - Y.M. on rules, gentleman, Em's <sup>man</sup>
- ③ ~~1st~~ - A.S. - on ~~some~~ <sup>more</sup> nice man
- ④ Etq on writing
- ⑤ Y.M. a greeting
- ⑥ Etq on clothes
- ⑦ Y.M. on clothes

BB-31-a-654

70770 RITE  
 100 SHEETS 42-382  
 50 SHEETS 42-381  
 50 SHEETS 42-481

Buy cheese, crackers, coffee  
 Buy flowers

DATE | 9:30 to 6 |

I. Setting the context

- a) Greeting + getting to car  
 explain mechanics as usual in his car to go to the next 1/2 hour of your time - making car story - just to have some time to drive
- b) Driving to park give gen'l idea -  
 1) delay - not so long ahead  
 2) want to get to know you - talk about self - select bits of autobiography something - comedic
- c) laying out blanket + dishes talk about self + changes in thought  
 (not) Wants to Park + semi

- a) outlining specific purpose: to get her to confide
  - 1) any wisdom - healthy - particularly Moly
  - 2) my egoism + apology
  - 3) request to trust though don't deserve
  - 4) you really need to

find you just a few lines, ok?  
 look for that of me just a bit?  
 by God's grace

Moly  
 1) Roses  
 2)

II. Invoking talk about her hopes + fears

- a) ~~recall~~ what I've learned about you
  - 1) Sansara - or a childhood - use of "love" - need to love ...
  - 2) ~~bankrupt~~ ~~emerged from~~ ~~part of~~ ~~heart~~ ~~ring~~ ~~manuscript~~
  - 3) indifference about what to do - afraid to act
- need: 4) idealization - e.g. Pete but after (committed); Father George - form of escapism  
 forget me - to know

III. Concluding

- 1) advice as Xian friend
- 2) establish how she stands with me
  - a) can't could ever
  - b) if willing to explore
  - 6) inquire if old ever
  - 2) if willing to explore now
- 3) practical matter 3) wishes to left 2) letter writing
- 3) Driving home
  - a) see any more before leaving - eg. drive to shop - is it
  - b) man scene
- 4) Saying good bye

BB-31-a-155

PLEASE RECYCLE  
 100 SHEETS 42-382  
 50 SHEETS 42-381

7/17/70 NUFF  
100 SHEETS 42,482  
50 SHEETS 42,481

Milly

- ① I know you're surprised to see me back
- ② I want to ~~ask~~ ask you ~~something~~ -  
would you ~~consider~~ <sup>let me</sup> ~~allow me~~ to drive  
you back to Oxford ~~in Aug 9~~ in 3 weeks
- ③ You mentioned <sup>this</sup> a couple months  
ago - ~~and~~ ~~that~~ really want to do it
- ④ It'll be the last time a while -  
next I got to see you
- ⑤ We could ~~see~~ stop off for half a  
day at the young life ranch  
on the way - I see all these new people
- ⑥ ~~I~~ then go straight to Oxford
- ⑦ Then I'll come back, stopping in  
Chicago
- ⑧ Drive home
- ⑨ My doctor on R.A. said -  
Aug 9 -  
will only miss 3 days of school
- ⑩ I know you might feel uncomfortable -  
a) we'll be both

Milly you know exactly how I feel -  
sure of wanting to love you the way -  
but I'm not a child +

Aggressive

- ② Be humorous
- ③ Be very going
- ④ Be kind

- 1) I've got to see you
- 2) would you do me a  
favor? - would you let  
me drive you back to  
Oxford in three weeks?

- a) we could have a  
great trip -  
could stop off at  
the young life ranch  
see all these new  
people once again.
- b) I've travelled with  
him I feel - some of all  
kinds ~~me~~ to see  
you come - but the  
best you could do  
is let me take you back

c) Milly - that's worse  
of your business -  
I wish I was out of  
wired out so I'd  
like to see, the way  
driving to a day, to  
fill it a day, to be  
both, none only!  
week of dance.

d) I want to do this  
with her driving - so  
a favor to me, her friend:

2 things  
 1) Can't predict & worst - but that's not most important

2) Haven't contributed much to your life  
 - only in a superficial way  
 - no understanding, sympathy - and I want to do better now

III  
 He's about you want to read  
 We can't run around  
 Let me context  
 Allow no protest -  
 "I have you for an hour"

701720 MIFT  
 100 SHEETS 42-307  
 50 SHEETS 42-381  
 50 SHEETS 42-481



IV Conclusion about us

- 1) How stand
- 2) Willing to explore?  
 - Complicated -  
 - Critical version  
 - Compulsion
- 3) Visiting Letko - working
- 4) Visiting

Contingencies  
 when - where  
 required to go  
 limited time available  
 Moody Jerry

Hot time

3-31-9-157

I

1) I miss - early  
 2) I miss - early  
 3) I miss - early  
 4) I miss - early  
 5) I miss - early  
 6) I miss - early  
 7) I miss - early  
 8) I miss - early  
 9) I miss - early  
 10) I miss - early

15/3

16

Do you think you'd like to talk again  
 Just me as you think - can

II

That's how I know  
 that miss you a lot in repressed -  
 which needs to be filled out to  
 someone you can trust -  
 to someone who will escape not  
 what you say can be no long contracts -  
 what you say can be no long contracts -  
 what you say can be no long contracts -  
 what you say can be no long contracts -

Approach

1) I know you must be tired of's 4  
 2) But you've I've decided anyway  
 to spend the remainder of his affairs  
 with you.

I identify

1) This is the basis of day  
 2) This is the basis of day  
 3) This is the basis of day  
 4) This is the basis of day  
 5) This is the basis of day  
 6) This is the basis of day  
 7) This is the basis of day  
 8) This is the basis of day  
 9) This is the basis of day  
 10) This is the basis of day

II - special's expectation

1) Do you know what that is -  
 2) Do you know what that is -  
 3) Do you know what that is -  
 4) Do you know what that is -  
 5) Do you know what that is -  
 6) Do you know what that is -  
 7) Do you know what that is -  
 8) Do you know what that is -  
 9) Do you know what that is -  
 10) Do you know what that is -

III - request

1) I request you to do this  
 2) I request you to do this  
 3) I request you to do this  
 4) I request you to do this  
 5) I request you to do this  
 6) I request you to do this  
 7) I request you to do this  
 8) I request you to do this  
 9) I request you to do this  
 10) I request you to do this

IV - springboard

1) I've been a few things  
 2) I've been a few things  
 3) I've been a few things  
 4) I've been a few things  
 5) I've been a few things  
 6) I've been a few things  
 7) I've been a few things  
 8) I've been a few things  
 9) I've been a few things  
 10) I've been a few things



20420 BUFT  
100 SHEETS 42-387  
50 SHEETS 42-481

Use car - Sun a.m.

Deeds

- 1) Drive to city (give her map when gets in car)
- 2) Meet Molly
- 3) Drive to park - outside area
- 4) take a blanket
- 5) buy cheese + crackers + get thermos coffee

Take up a box of vanilla ice cream

Approach

- 1) She is what I do for me
- 2) be kind
- 3) be warm - was afraid she'd start y
- 4) to put me + couple in line

approach  
1) in the happy  
2) Molly smiles  
have tried to give  
**UNDERSTANDING**

haven't tried to understand you  
see as object of a quest  
prize to be taken  
could write long letters  
what I say need

attitude: try to understand Molly  
yucky grey love - really satisfy

- 1) ask her to park
- 2) asking her to talk about
- 3) getting Molly to articulate what's inside

she & blue us for answer - be decisive, positive, persevering

see Robert Molly  
let Molly do the talking

heart like cameo  
ready to love  
need to articulate what's inside

- 1) left line - just - no matter how disliking I'm prepared
- 2) front pit crew - looking at you as you - I do help by being supportive - not like talking
- 3) direct at it - love will be to let you if you can't find a part of it

Ed to  
Coping Molly - can use up love  
what you have so at you  
it's not to let her - I want her - while  
always know - not forget her - she can't be that  
preliminary - not a date - as maybe the do dispar  
1) later writing - still up - how often  
2) not to have approach her - you stand - in a group manner  
3) care - please be smart - in order  
here - really - equivalent - in order  
convenient - Molly's happy - but  
now - fit her

Me  
1) let you  
2) ready to love you  
3) ready to explore with you  
how you feel  
1) not - never  
2) not - not really  
3) willing to explore the possibility

do you know about you want  
make her use to love -  
very independent some  
etc  
part - you know "love" a lot -  
think for it

and I have filled about you  
I know how much you desire talk -  
like - to give words - not just talk -  
but that I, Tom, you, and I = 1

maybe you would make to  
love to single person -  
+ one of you now, but I  
should be a person for more.  
write from I.

Frank:  
him his ego  
to be as little from not to do

like  
to discuss - AM her about she  
words  
left - hear  
usually ready to love, to explore  
Molly of you reasons to coming list

conduct all practical details  
let her -  
when visit - when Sept?

she  
probably need help -  
ring - some help -  
explicit reason

1) she's in a line - with - to  
test my eye  
2) not know - not know - long - praying  
more - strong - upset - more - not  
living - you - more - in - eye

BB-31-a-158



12:30 - See her  
 1) get consent to take scene  
 2) set time for afternoon

Need marriage to understand God's love -

sexuality w/o love w/o age etc  
 but must mature - ie discipline each

God's place in marriage

really - I know you're awfully busy with last  
 minute preparations et al -  
 and maybe you're right to ~~not~~ ask you  
 to spend time with me -

{ but look - this afternoon & that afternoon I  
 want to be ~~be~~ something you will enjoy -  
 and it something you will enjoy -

for a long as you are willing to spend

2 ~~plans~~ ① to go to Coleridge Park  
 + walk around + maybe take a  
 boat ride - any number of things to do

② go to woods for 1 last quick  
scene

look, really, I ~~can't~~ want the atmosphere  
 to be free + easy - you won't feel uncomfortable  
 as if I'm going to get on my white horse + ride  
 but - just express ourselves naturally - it's not just agreed,

- this last 2 weeks ~~is~~ <sup>is</sup> much God has done me  
 to make apart myself from you - once I've shown myself willing to be ~~responsible to take it~~  
 & how I've treated you like a carriage - an object, a ~~thing~~ <sup>thing</sup> ~~not~~ <sup>not</sup> ~~person~~ <sup>person</sup> ~~with~~ <sup>with</sup> ~~feelings~~ <sup>feelings</sup> ~~and~~ <sup>and</sup> ~~thoughts~~ <sup>thoughts</sup> ~~and~~ <sup>and</sup> ~~ideas~~ <sup>ideas</sup>

a presence - in my own personal gratification - ADMISSION  
 ② that as a person, I've had restraints - don't  
 even tell me I've given - UNDERSTANDING - always talk of me -  
 how feeling my work here wrong

just today - this 1 last time I have the privilege to  
 spend time with you - want to give you something - work  
 & always talk - understanding - to get to know you

RELEASE  
 100 SHEETS 42,382  
 30 SHEETS 42,381

175/20 RUFF  
100 SHEETS 42-482  
175/20 RUFF  
100 SHEETS 42-381  
50 SHEETS 42-481

Influences on Midway - part work

- ① M/S
- a) appears more of Xenity - her
  - b) some change of "wrapped-up" - <sup>partial</sup> he describes (as)
  - c) revision of my team - <sup>partial</sup> the other on one Sunday
  - d) non-group writing
  - e) gas kb
  - f) willing to listen - could write elsewhere
  - g) social support of
  - h) for last time - <sup>partial</sup> the other on one Sunday
  - i) function "structured"

- ② Bedvice
- a) first step - fitting in of description
  - b) other thoughts
  - c) byr subtraction
  - d) <sup>partial</sup> the other on one Sunday
  - e) <sup>partial</sup> the other on one Sunday

- ③ Research
- a) life, choosing, organizing - <sup>partial</sup> the other on one Sunday
  - b) paper work - <sup>partial</sup> the other on one Sunday
  - c) <sup>partial</sup> the other on one Sunday

④ Exam

Discussion of life - is this - time

time not that in down

time of day to see how better

⑤ How to start - but <sup>partial</sup> the other on one Sunday

can't be separate, separate, compared

⑥ Write of mind - <sup>partial</sup> the other on one Sunday

⑦ How to start - but <sup>partial</sup> the other on one Sunday

⑧ Exam

How to start - but <sup>partial</sup> the other on one Sunday

⑨ Exam - <sup>partial</sup> the other on one Sunday

Analysis of part - <sup>partial</sup> the other on one Sunday

Write in - <sup>partial</sup> the other on one Sunday

Other

defiant - phantoms - lot times - to stop

other new

to my - Michelle

partial

plan - <sup>partial</sup> the other on one Sunday

analysis on an stage

2. <sup>partial</sup> the other on one Sunday

3. <sup>partial</sup> the other on one Sunday

Plan - <sup>partial</sup> the other on one Sunday

these work - the end of year

set - <sup>partial</sup> the other on one Sunday

Exam

How to start - <sup>partial</sup> the other on one Sunday

⑩ Exam - <sup>partial</sup> the other on one Sunday

Exam - <sup>partial</sup> the other on one Sunday

Set - <sup>partial</sup> the other on one Sunday

20731 UNIT  
 100 SHEETS 42-487  
 30 SHEETS 42-481  
 171 PAST  
 100 SHEETS 42-387  
 30 SHEETS 42-381

		m/s
<b>A. character</b>		
1)	understanding + broadmindedness (12) ambition 0 prejudice 0	10
2)	kindness + sympathy (12) selfishness unlend to certain types	11
3)	honesty (9)	4
		<u>28</u>
<b>B. personality</b>		
1)	disposition (14) even moodiness (-2)	12
2)	spontaneous (7) vivacious, sparkling	7
3)	sense of humor (7)	4
<b>C. balance</b>		
	intelligence (12)	10
	mutual interests (12) ally 0 sports	<del>10</del> 9
<b>D. physical appearance</b>		
1)	charm (11) speech 4 manners 3 grooming male-appearance 9	10
2)	looks (9) face 4 shape 3 nose 3	8
(Adjustment creation)		(8)

BA-31-a-161

104



BB-31-a-162



701720 RIPT  
100 SHEETS 42,387  
50 SHEETS 42,481

Denial

~~Denial~~  
The need to know about this which I have, to some extent, puts to the test your regard for my privacy.

attribution  
Hacks - ~~the~~ September

July - July

attribution

Student for Hatfield

What does Kelly want:

- ① Strength
- ② Understanding of his as woman
- ③ Love for people by & limit

① Drink home - 20  
②

~~you know pretty much how I feel about you~~  
~~and that I loved you for your qualities~~  
 This would be love you for your person - I want it.

your smile, your eyes, your hair, your voice,  
 your disposition, your heart, your beauty,  
 things that go to make a good person.  
 and be close to you now - heart that has  
 so much love in it for other people.

if that

b) in so far as a human desire as concerned, here are  
 2 things I want more than all else -  
 ① to be President of the U.S.  
 ② to marry you - and if I had to choose between  
 the two, I would choose the second. But he later said any  
 one who would do this was not serious about it.

and I know pretty much that I have met, and do  
 it, think reciprocal feelings for you

a) when it has been let - ~~it is~~ this was discussing  
 to me - because I was also been too certain kind of I  
 really tried & pressing, I would get me wrong. I want  
 get with you - but because I felt at ease & easy and  
 even more than that not completely.

b) ~~the~~ I accept with me had with but could not to end to look for  
 for 13 million 2) 2000000 3) 2000000  
 million and his salary - not like you - I know I know  
 the amount of money I need, I need the amount of money I need

② I also know that, let's be clear, women liked to be worked,  
 to feel dominated - to  
 that is to that the man has to have a certain number of  
 self-esteem with I met you I didn't have it -  
 can't explain why - I think of her to do with the fact  
 I'm always determined to be ~~at~~ set my self aside  
 & her to that I decided - but wanted to be intellectual +  
 compete with great men - but now I know I'm not  
 a man in intelligence.

③ ~~the~~ I just don't think it's come back - I just  
 thought that had to be the wrong way to go about it.

Good woman  
 ① All this while God was putting up with me for my rebellion  
 against him  
 ② I recognized my sin - in fact I wish so that I had to  
 go to purgatory, well, well, well, well, well, well, well, well  
 ③ But I recognize no sin in my rebellion, just as I did when I  
 I had the feeling you were not happy really - because  
 you love at my self now - but now I'm a woman in  
 it just because I'm God - a bright eye of God that I know  
 we're don't great the pleasure that path

④ If you're damn sure that I know I was at least to  
 accept for the U.S. - which I did. Now I shall be happy  
 but I'm not for the U.S. - but I shall be happy  
 ⑤ And all the while - I'll love you - if you love me, I'll  
 stay in your life - you love me, I'll stay in  
 - just, really, I see your sad eyes - all you have  
 Mean - these are the things that I know I know  
 and I just now understand - because I know  
 now so far as I understand.

⑥ And to be me. No thinking they would see that you're  
 in a lower state for that for me to love you - I know  
 who will love not why you - what I do, believe as I do, but  
 do as I see and see.

⑦ I that that was, wasn't in a way - why can't you be  
 satisfied?  
 ⑧ I know you would be so much that I had been that  
 last Sunday when I left you, I know that  
 I was not to look at you - but I had been that  
 and that's the reason - is I didn't want to find the door I  
 was to you, and I know, is that I was saying  
 at you for having such a life.

yet all the time God has been watching -  
 a) I know that the church has recognized that if I do it  
 then I shall be in a bad place - but I shall be in a bad  
 & I shall be in a bad place  
 b) I know that you're not in a bad place - but I shall be in a bad  
 & I shall be in a bad place - I shall be in a bad place  
 c) I know that you're not in a bad place - but I shall be in a bad  
 & I shall be in a bad place - I shall be in a bad place

BB-31-a-164

7/17/70 RUF  
100 SHEETS 42-482  
50 SHEETS 42-481  
FVF:JAV  
100 SHEETS 42-482  
50 SHEETS 42-481

A) ~~How far~~ <sup>for whole world in the way it's here</sup> ~~is really~~ <sup>is really</sup> ~~enough~~ <sup>enough</sup> ~~to~~ <sup>to</sup> ~~live~~ <sup>live</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) X became a little more real -  
2) see Mary, and being <sup>from</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~And~~ <sup>And</sup> ~~the~~ <sup>the</sup> ~~fact~~ <sup>fact</sup> ~~is~~ <sup>is</sup> ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~reported~~ <sup>reported</sup> ~~is~~ <sup>is</sup> ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
4) ~~for~~ <sup>for</sup> ~~you~~ <sup>you</sup> ~~and~~ <sup>and</sup> ~~the~~ <sup>the</sup> ~~fact~~ <sup>fact</sup> ~~is~~ <sup>is</sup> ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
5) ~~for~~ <sup>for</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
6) ~~for~~ <sup>for</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

B) See the ~~fact~~ <sup>fact</sup> ~~is~~ <sup>is</sup> ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
2) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
4) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
5) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

C) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
2) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
4) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
5) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

D) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
2) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
4) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
5) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

Q: ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
2) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
4) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
5) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

- ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
2) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

= 60 ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
1) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
2) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -  
3) ~~to~~ <sup>to</sup> ~~be~~ <sup>to</sup> ~~in~~ <sup>in</sup> ~~the~~ <sup>the</sup> ~~way~~ <sup>way</sup> ~~of~~ <sup>of</sup> ~~the~~ <sup>the</sup> ~~city~~ <sup>city</sup> ~~every~~ <sup>every</sup> ~~day~~ <sup>day</sup> -

1) I love you  
2) I love you, in the way you love me, in the way you love me, in the way you love me  
3) I love you, in the way you love me, in the way you love me, in the way you love me  
4) I love you, in the way you love me, in the way you love me, in the way you love me  
5) I love you, in the way you love me, in the way you love me, in the way you love me

BB-31-a-165



Yes, he

Just in case you didn't know it, you have  
no right  
~~to~~

It's not really

20120 NUFF  
100 SHEETS 42-3R2  
30 SHEETS 42-3R1  
50 SHEETS 42-4B1

Molly,  
The worst thing about your not being  
Please get ~~it~~ <sup>quit</sup> ~~so~~ <sup>much</sup> ~~interested~~  
for your sake, or mine, but for this <sup>world's</sup>  
How rare and ~~precious~~ <sup>valuable</sup> ~~to~~ <sup>for</sup> ~~me~~  
to find such <sup>humaneness</sup>  
of values, such delicacy of <sup>manner</sup>  
Cagernality of spirit, such vibrancy of  
response. ~~It is an obligation to keep~~  
~~it~~ ~~in~~ ~~your~~ ~~mind~~ ~~as~~ ~~well~~.  
Let me know you'd ~~like~~ <sup>like</sup> ~~to~~ <sup>to</sup> ~~start~~ <sup>start</sup> ~~making~~ <sup>making</sup> ~~quilts~~ <sup>quilts</sup>  
as well.

Tim <sup>Stoen</sup>

BB-31-a-166

- 3 topics
- ① Evidence
- ② Kirkwood
- ③ Anglicanism

ECAL: Harry Mally in September

Framework: ~~done~~  
 to Aug 7 - courtship  
 Aug 7 - Drive to Ohio (Lledo) to  
 Aug 14 - Final arrangements  
 (H 7) 21 - wedding  
 Sept 23 - Report

100 SHEETS 42-382  
 50 SHEETS 42-381

- June 30 - Aug 7
- ① Personal masky
  - ② Power + intel + equiv
  - ③ Christian concern

- Clues
- ① Maria's Clue -  
charm, delay, gathering
  - ② Pkt -  
personal, direct, reserved,  
Xian

- ① Personal masky
  - a) Straightforward about objective
  - b) Obast name ever - letter
  - c) intent to win you
  - e) behavior - sure, precise
  - ① Demerative "I love to be tricked" - ~~with a struggle~~
  - ② ~~with a struggle~~ - ~~with a struggle~~
  - ③ ~~with a struggle~~ - ~~with a struggle~~
  - ④ ~~with a struggle~~ - ~~with a struggle~~
  - ⑤ ~~with a struggle~~ - ~~with a struggle~~
  - ⑥ ~~with a struggle~~ - ~~with a struggle~~
  - ⑦ ~~with a struggle~~ - ~~with a struggle~~
  - ⑧ ~~with a struggle~~ - ~~with a struggle~~
  - ⑨ ~~with a struggle~~ - ~~with a struggle~~
  - ⑩ ~~with a struggle~~ - ~~with a struggle~~
  - ⑪ ~~with a struggle~~ - ~~with a struggle~~
  - ⑫ ~~with a struggle~~ - ~~with a struggle~~
  - ⑬ ~~with a struggle~~ - ~~with a struggle~~
  - ⑭ ~~with a struggle~~ - ~~with a struggle~~
  - ⑮ ~~with a struggle~~ - ~~with a struggle~~
  - ⑯ ~~with a struggle~~ - ~~with a struggle~~
  - ⑰ ~~with a struggle~~ - ~~with a struggle~~
  - ⑱ ~~with a struggle~~ - ~~with a struggle~~
  - ⑲ ~~with a struggle~~ - ~~with a struggle~~
  - ⑳ ~~with a struggle~~ - ~~with a struggle~~
  - ㉑ ~~with a struggle~~ - ~~with a struggle~~
  - ㉒ ~~with a struggle~~ - ~~with a struggle~~
  - ㉓ ~~with a struggle~~ - ~~with a struggle~~
  - ㉔ ~~with a struggle~~ - ~~with a struggle~~
  - ㉕ ~~with a struggle~~ - ~~with a struggle~~
  - ㉖ ~~with a struggle~~ - ~~with a struggle~~
  - ㉗ ~~with a struggle~~ - ~~with a struggle~~
  - ㉘ ~~with a struggle~~ - ~~with a struggle~~
  - ㉙ ~~with a struggle~~ - ~~with a struggle~~
  - ㉚ ~~with a struggle~~ - ~~with a struggle~~
  - ㉛ ~~with a struggle~~ - ~~with a struggle~~
  - ㉜ ~~with a struggle~~ - ~~with a struggle~~
  - ㉝ ~~with a struggle~~ - ~~with a struggle~~
  - ㉞ ~~with a struggle~~ - ~~with a struggle~~
  - ㉟ ~~with a struggle~~ - ~~with a struggle~~
  - ㊱ ~~with a struggle~~ - ~~with a struggle~~
  - ㊲ ~~with a struggle~~ - ~~with a struggle~~
  - ㊳ ~~with a struggle~~ - ~~with a struggle~~
  - ㊴ ~~with a struggle~~ - ~~with a struggle~~
  - ㊵ ~~with a struggle~~ - ~~with a struggle~~
  - ㊶ ~~with a struggle~~ - ~~with a struggle~~
  - ㊷ ~~with a struggle~~ - ~~with a struggle~~
  - ㊸ ~~with a struggle~~ - ~~with a struggle~~
  - ㊹ ~~with a struggle~~ - ~~with a struggle~~
  - ㊺ ~~with a struggle~~ - ~~with a struggle~~

- ② Power + intelligence (future)
  - a) talk
    - ① new schedule - 5:30 P.B., end, not, talk
    - ② law school - legal aid
    - ③ good plans
      - a) trial exam
      - b) trial work - 2 years
      - c) trial work - 2 years
      - d) trial work - 2 years
      - e) trial work - 2 years
      - f) trial work - 2 years
      - g) trial work - 2 years
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      - q) trial work - 2 years
      - r) trial work - 2 years
      - s) trial work - 2 years
      - t) trial work - 2 years
      - u) trial work - 2 years
      - v) trial work - 2 years
      - w) trial work - 2 years
      - x) trial work - 2 years
      - y) trial work - 2 years
      - z) trial work - 2 years
  - b) behavior
    - ① inquisitive + poetic conversation
    - ② self - enough + amuse with other men - look at
    - ③ review daily 5:30

- ③ Christian concern
  - a) talk
    - ① spiritual world
    - ② spiritual world
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  - b) behavior
    - ① lay reader
    - ② paper book

- Arrangement:
- ① Drive you to destination to allow - ~~with a struggle~~
  - ② Tuesday night - ~~with a struggle~~
  - ③ Sunday - ~~with a struggle~~

- Conversation topics
- ① P.B. Anglicanism
  - ② Anglicanism
  - ③ Anglicanism
  - ④ Anglicanism
  - ⑤ Anglicanism
  - ⑥ Anglicanism
  - ⑦ Anglicanism
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Sun: 5:30 - up exam  
 6 - work  
 6:30 - shoes  
 7:00 - gym  
 8:00 - P.B., Anglicanism  
 9:15 - breakfast  
 10 - only lunch  
 up to 10:30 P.B.

BB-31-a-167

100 SHEETS 47.382  
50 SHEETS 47.381

### Saturday date

- ③ shoes skinned before hand
- ④ call Thursday
  - a) time - earliest -
  - b) dress - shorts
  - c) bring swim suit evening clothes
- d) confirm Committee seats to receive tickets

### Pre Skill

④ Sat am - call stables (time) - receive keys for

④ get ~~from~~ ~~disables~~ to stables from Larry

④ set alarm before picking up Molly - pick up tickets for Committee

④ Sat am - wash car / - clean room

④ ~~Wed~~ ~~am~~ - get haircut / - pick up shirts

④ Permits - buy stacks

④ ~~Chips/Tenings~~ - get the polo shirt grey

④ Laundry clothes

- ④ sheet
- ④ bermudas
- ④ long brown socks - by hand

④ posture exercises

④ conversation

④ guidelines

- ④ reserve - myd
- ④ non-verbalized administration
- ④ ~~main~~ ~~of~~ ~~enjoyment~~
- ④ ~~project~~ ~~time~~ - as per. of H

④ Sanhygic

- a) next event
- b) contingencies if 1st device fails
- c) topics of conversation

④ FORGET all details + love yourself  
predicting 1) Kelly's individual person  
2) Mark's mother's person

④ pretend Molly + what she's up to in

④ put camera in car, anthology, Pullman

④ Friday or Sat dinner indoors

④ Friday -

- ④ ~~Oliver~~ ~~myc~~ - trousers
- ④ ~~come~~ - shorts
- ④ ~~chips~~ - with + gray polo

### Friday schedule

~~the~~ ~~one~~ ~~other~~ ~~schedule~~  
 hire truck of evening  
 swim room ~~the~~ ~~at~~  
 walk - ~~room~~ - ~~camp~~  
 sleep  
 coffee: eat at work table  
 : cherry top to city (6:4)  
 watch TV: like to movie

Committee at 9 [miss notes up] [moss-making id] alternative

### Gen'l

- ④ car fixed up wheels packed
- ④ call for morning app'tment
- ④ blue ar-down - 4 E book
- ④ confirm Dean of the U
- ④ return d/ bike

### Hand life

④ Pullman

④ ~~eat~~ ~~at~~ ~~my~~ ~~home~~ + ~~bring~~ ~~knives~~ - ~~at~~

④ ~~bring~~ ~~knives~~ - ~~to~~ ~~school~~

④ ~~bring~~ ~~knives~~ - ~~to~~ ~~school~~

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④ ~~bring~~ ~~knives~~ - ~~to~~ ~~school~~

④ lose weight

200 cal/day  
(buy protein gel)  
low-cal drink  
saled walking

④ fitness

Mon - 30 min - P.A.

Tue

Wed

Thu

Fri

Sat

Sun

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Sun

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eyes --bright, dancing, playful, exuberant  
smile--winsome, irresistible, quick, spontaneous  
lips--alluring, like strawberries <sup>red of</sup> against pure golden sand.  
teeth--shining, like jewels perfectly set to frame words  
fresh, profound, sensitive  
feature, deft, perfectly symmetrical  
deft- nose--saucy yet chic,  
skin, rich, gold and red like the sand and sun,  
hair--raven,  
ears--delicate, discreetly set  
neck--like a Grecian column-white, proportioned,  
overall countenance--feminine, strong-yet- independent yet  
trusting, captivating, enchanting, joie de vive-reflection,  
mesmerizing, swept with beauty.  
gestures--simple, discreet, warm, humane  
personality--invokative of pleasure, absorbing utterly.  
dance like sunshine through beads of moisture barely clinging  
to the earth before their long ascent upwards after the rain.  
grass

BA- 31-a-170

Sunday eve.

Dear Molly,

This is a little difficult for me, but so please understand. This afternoon Jim asked if I knew I could never have Molly you. The full impact has not yet reached me yet so I better ~~get this out rather quickly~~ it might be best to ~~say it~~ now.

Maybe it is wrong for me to sense in this the tragic.

From one point of view this was the most tragic event of my young life. But Love is a mysterious thing and particularly to an awkward lover. I kind of realized all the way along but hope does breed eternal. I guess. How many nights I have verbalized to the night air above my bed. ~~ecstatic~~ expressions of love for that woman whose every pore oozes beauty and loveliness. For that woman of the dancing, sparkling eyes bright, sparkling eyes, whose which dance like fireflies against black ivory. For that woman whose lips allure like wild succulent wild strawberries, whose raven hair reflects the purity of the night, whose teeth bespeak the artistry in marble more magnificent than Micaelangelo's whose nose and lips reveal the symmetry and delicacy which ~~make~~ would make geometry a noble science, whose skin is ~~rich and pure~~ and golden as the sun and the sand whose neck would make the Grecian sculptors agonize in envy; whose movements and carriage bespeak nobility unmatched even by those most aristocratic divinitie encountered by Odysseus on his way home. whose heart transmits such humaneness and love for those unfavored in beauty and wisdom that the angels weep whose face expresses such joie de vivre that the world has not yet discovered its mystery.

For her

can not unraveled the divine mystery of its source.

To her whose lips are the first that mine have kissed, to her whose eyes are the only pair on which I could feast with excitement for hours, to her whose talk could words could change the very complexion of life--to this Molly I will be eternally grateful. She came this way, stopped, touched lightly touched my life, and changed it irremediably, a little lighter, now early summers my heart in a land now sense my Savior more acutely.

Forever will I ~~conjure feelings~~ for her so intense as ~~as a~~ is brittle, forever will I write to her regardless of response, and forever will I carry in my heart the seed of hope, simmering in its dark chambers, that someday the inscrutable and seemingly capricious winds of eros will swift it away to take root and flower and int in her heart and flower into a carefree rapture.

Meanwhile let outward divilities obtain to hide this secret to keep hidden of casual affection obtain to keep and keep secret these inward thrusts of intensive passion.

~~With love to this world~~  
far too gentle to ever quell.  
promulgance of

And so, Molly, ~~do I love you~~ do I love you.

Sincerely,

Tim

movements of continual  
-waves of  
frused

BB-31-a-171

~~-----~~

Hello. May I speak to Molly Shearer please.

Oh Hello Molly. This will <sup>not</sup> mean anything to you--but my name is Tim Stoen, and I'm a ~~typicakly~~ <sup>lead</sup> typically unimaginative life as a student of the law here in Palo Alto, California.

Your entry into my consciousness occurred about four years ago this month, at some Young Life deal in Lake Geneva, Wisconsin. It was ~~ea-a-Sunday-dinner-and-during dinner~~ on Sunday noon, and people started to sing happy birthday or something to some girl named Molly. I looked to my right, and there she was, glæfully locking the chicken off her fingers and evoking ~~charisma-~~ <sup>charisma-</sup> ~~the~~ charisma all over the place;

Appropriately taken aback by her ~~surface-~~ <sup>such</sup> vibrancy ~~her~~ ~~surface-~~ ~~features,~~ I ventured a question or two, ~~te~~ a regular habit, to confirm to myself that what lay behind looks never was books.

You can imagine the pleasureableness of my supprise, when <sup>she happily</sup> ~~the~~ my ~~response~~ was rebutted <sup>by a</sup> ~~most~~ happy verbal response, displaying <sup>in</sup> ~~a~~ delicious and ~~delicate~~ turn of wit.

Overcome with lack of self-assurance at this point, ~~accentuated by the termination of the program,~~ I let escape this rare opportunity to ~~explore further into the~~ <sup>fully</sup> ~~marvellously independent young maiden.~~ ~~And so it has been for four years that from my subconsciousness~~ ~~periodic intrusions of this young~~ ~~graceful~~ ~~woman of intel-~~ ~~lectual and social grace has~~

And so for four years <sup>her</sup> ~~the~~ image of this young woman of intellectual and social grace has entrenched itself in ~~my~~ <sup>the</sup> subconscious, lying ready to spring across my mind given the proper stimulus.

The proper stimulus occurred this past Wednesday, when Pete and Jani Sherrard came by to help drag me from the Bohemian temptations <sup>which</sup> ~~besetting~~ those who live in libraries and to brighten my spirits generally. They did. ~~ok~~ <sup>and</sup> in the course ~~of the~~ <sup>of</sup> ~~they~~ <sup>they</sup> mentioning that ~~name-~~ ~~your~~ ~~happy~~ ~~name,~~ ~~and~~ ~~ever~~ ~~since~~ ~~we~~ ~~have~~ ~~been~~ ~~working~~ ~~up~~ ~~the~~ ~~case~~ ~~to~~ ~~you~~ the happy fact that Molly Sherer ~~is~~ <sup>actually</sup> ~~has~~ been living right here, in our glorious little city on the Pacific.

And so, ever since, I have been working up the courage to telephone Molly Sherer and ~~expose~~ ~~myself~~ ~~to~~ ~~her~~ ~~lay~~ ~~bare~~ ~~my~~ ~~desire~~ ~~to~~ ~~get~~ ~~to~~ know her a little ~~bit~~ <sup>being</sup> better. ~~I~~ ~~SD~~ ~~--~~ ~~Supposing~~ ~~the~~ ~~normal~~ ~~procedur~~ in such an instance <sup>at</sup> ~~to~~ ~~invite~~ ~~her~~ ~~to~~ ~~some~~ ~~cultural~~ ~~own~~ ~~affair,~~ thus displaying in an indirect way ~~one's~~ ~~own~~ ~~cultural-~~ ~~index~~ ~~of~~ ~~urbanity,~~ ~~and~~ ~~fighting~~ ~~two~~ ~~things~~ ~~I~~ ~~actually~~ ~~liked,~~ I wonder if she would be free, 1) ~~to~~ ~~and~~ ~~would~~ ~~seriously~~ ~~enjoy~~ ~~one~~ ~~of~~ ~~the~~ ~~following:~~ 1) a concert by Isaac Stern next Sunday at 3 p.m., 2) a recital <sup>by the</sup> ~~of~~ ~~the~~ ~~classical~~ ~~guitarist~~ ~~Segovia,~~ 3) ~~nothing~~ ~~except~~ ~~a~~ ~~on~~ ~~the~~ ~~Sunday~~ ~~following~~ 3) a plain ordinary dinner out, or 4) you ~~name~~ ~~it~~ <sup>it</sup> should one of these options be agreeable, I wish terribly much Molly would save me from ~~the~~ ~~an~~ ~~xious~~ ~~heart~~ ~~by~~ ~~an~~ ~~affirmation~~ ~~accordingly.~~

In fact, even if ~~it's~~ ~~not~~ ~~with~~ I'll do it.

BB-31-a-172

Very Personal - For Jim's Eyes Only -

Re: Problem with wife - From T.

To: Jim - BE CAREFUL: My Wife IS ABOUT TO ASK YOU SOME LEADED Q's!  
Please be advised about the following frame of events:

1. On ~~Friday~~ Thursday, July 8th, my wife at work stated she "couldn't go on" living with me because I was chasing other women in the church and that she must not be meeting her ~~own~~ my needs, that I was immature to have to do this, and that she was tired of people laughing at her because of the rumors circulating about me, and that people looked at me as if to say "what's with him, anyway!" She cried, and said she ~~made~~ couldn't take it and that she was leaving me.

2. I argued that I was not "chasing" women, that I wanted to "help" women who ~~didn't~~ <sup>did not</sup> have needed attention based on respect as well as phys. and that she could know this by the fact that the three women who I had shown an interest in were not ~~total~~ the ~~typ~~ beauty-queen type I had always previously been exclusively interested in. I said that if her analysis of my motives were correct I would be chasing Sandy Legals and not MB, or LA or LS. She replied that I admired strength (and therefore found it in LS), wisdom (in LA), and black sexuality (in MB). <sup>and that she had the physical attractive in mind</sup> I said she had promised before we got married that I could go out with other women and she could not accuse me of duplicity. She did not deny this (for she had ~~previously~~ said it would be to go out and I shouldn't be a slave, etc - although the reason she said this probably was due to my telling her before the wedding she was free to go out with other men if she wanted to, etc).

XX she specifically asked me question after question about LS, including "Tell me, yes or no, did you ever place [L.S.'s] hand on your penis of all places, in your office and did she find this revolting?" I hesitated for a quite a few moments + quietly said "yes." I did so because I felt that the question was an acid test of my willingness to be truthful and that she was truthful in saying she had reliable sources for this knowledge. I then said I didn't know she found it revolting.

XX I felt two inches tall as I saw her cry and heard her accuse me of using her, letting her cook my meals, clean the house, wash the clothes, have no spare moments for her but have them for other women. She said that L.A. had come up to her and said "that [T.] if you doesn't turn me on at all!" [I had asked my wife if I could have physical relations with L.A. because she needed them, and my wife had then said O.K.] Ever since approaching L.A., L.A. has been aloof and a trifle hostile - she has stated to my wife I have an eye problem.

BS-

31a-173



I drove down that afternoon with my wife to see her gynecologist. She told me I don't know how to deal with people and am ~~too~~ insensitive and lack empathy. I can now see that substantially she's right.

During the course of the <sup>afternoon</sup> I cried myself and felt near-hysterical at the thought of losing my wife, whom I really do love (insofar as I know anything about it, which, indeed, is limited). She said I didn't want to lose her because of embarrassment in the eyes of my friends and of my church. I reaffirmed over and over that I love her. (Immediately, my wife was very shaken up by the Wednesday night meeting. She feels that everyone is going to hate her for being pregnant, as evidenced by L.S.'s remark that people who have babies should pay for them. After the comment about the big wedding, she said she wanted to scream and run out of the church. She is particularly uptight at the fact that various men think she has wanted to fuck them because she has been friendly to them - she is irate about this and tends to compare outside men as more decent in being able to relate to her without ulterior motives.)

Anyway, the main problem came about on the way home from Santa Rosa. She kept asking me about L.S. and whether we had ever held hands. I answered yes. She then asked: "Did you ever kiss her and did she ever kiss you." Figuring she knew I answered "yes." Then I saw a look of shock in her eyes and sensed that I must have tarnished your standing in her eyes. She stated she was going to leave the church, that she just had a very important question to ask you, that she wanted to reach you wherever you were. (I became near-hysterical, feeling I was responsible for her leaving the church. She calmed me down.) She asked me how long this had been going on. I said "two months." (It then dawned on me that what probably happened is that you had told her that L.S. had found my touching her revolting. I had stated to my wife before this point that I didn't actually think it L.S. found me revolting and was surprised to hear her say that, that I thought L.S. liked me. She said "don't you know, that relationship is legit. L.S. doesn't like men. What makes you think she would like you?")

BB- I know the only thing that keeps my wife at the church is her belief in you. I felt terrible about saying L.S. liked me, and 31-a-174 I tried to explain that my ego is so great I could not, until now,

even accept the thought that a woman would not like me and thus my vision was distorted, as was my judgment, about the whole thing.

(What amazes me is how she learns all these things. She says that L.S. and L.A. have compared notes about everything I say or do to either, that Earth B. knows about M.B. and won't look my wife in the face, and that P.C. thinks I took a physical interest in her daughter T. because I had told her how beautiful T. was and T. had told her mother I put my arm on her shoulder. I did not take a physical interest in T and my wife does believe me on this. My wife states that K.L. went around telling people I was "compensating" with her. I ~~was~~ was, but only after K.L. had first started to ~~put~~ <sup>push</sup> her arms against mine when we were sitting discussing business meetings. ~~I think~~ Meanwhile I've commenced adopting a 6 inch rule like at Bob Jones University with respect to K.L., L.A., and anybody else my wife might be concerned about. K.L. is the only person other than those mentioned herein I feel I have compensated. I feel terrible in having to burden you with all of this, but I do so only because you asked me to write down my feelings in an effort better to understand myself.

I tried to repair the damage and be as objectively truthful as possible that night in bed. (I had started packing my suitcase telling my wife I was not fair to cause her so much hurt. (I had previously reminded her that the S way was to share husbands and wife and that she was not willing to be S. That did make an impression, I think, for she shifted her tone a little bit and became more calm in saying that maybe we should not live together because we had different philosophies and she wanted me to be free.)

in bed that night  
XX I said "you know, —, I was wrong when I told you L.S. liked it. She was cold, really cold. Now I'm starting to see this. I pushed myself on her and couldn't until now (myself) believe she didn't want to touch her."

Boo-XXXXX Then my wife said "Now this is extremely important to me. I must have the exact answers. When I ~~was~~ showed shock in my face it was not because of what you said, it was about someone else."  
31-a-175  
XX

She then asked the following Questions:

X 1. "When, before M.B. or after, did Jim tell you he wanted L.A. and you to get together?" My answer: "After - 2 or 3 weeks ago."

X 2. "Why did you at first, upon M.B.'s bringing it to my attention, first try to bring Jim into it saying Jim felt she needed a physical relationship? [Maybe she said: "by implying Jim wanted you to do it?"] My answer: Jim never told me he wanted me to relate to her physically. I just assumed it because of what he said about her being one of the most sexually deprived women in the church. I misunderstood him, which became clear to me upon reflection."

X 3. "Did Jim not come to you and say 'What's the big idea saying I asked you to get involved with M.B.?' My answer: "No, he didn't, nothing of the sort." Patty's side

X 4. "Why are you doing all this. Did Jim ask you to get involved with M.B.?" Answer: "No, I just felt sorry for her, particularly after watching her cry out her frustrations ~~and~~ at not being an intellectual etc at Linda Moros's rejection." The woman I thought she was

X 5. "Did Jim ask you to get involved with L.A.?" Answer: "No, I just felt she was sad and it would be therapeutic to have a ~~sex~~ physical relationship with someone who respected her."

X 6. "Did Jim ask you to get involved with L.S.?" No, I felt sorry for her. She was having a hard time with her ~~husband~~ who wanted sex and she didn't. I respect her immensely. It was mainly brother-sister type. I consoled her. I have never had sexual intercourse with her and I do not intend to."

X 7. [Asked before this: "You love L.S., don't you?" Answer: "Yes, but not in the way you are thinking. I could never be married to her. I want a deep friendship with her. You are, and I want ~~the~~ the woman I want to live with."]

BB-  
31-a-176

After these questions my wife did not specifically say she wanted to talk to you. But she did later ask something vague about it.

she did sleep with me that night. But she was too distraught to go to work Friday, so she stayed home until 3 p.m. and I stayed home with her.

I <sup>have</sup> told her I do love her, that I am willing to give these outside affairs up if it means not losing her, that I will try to spend more time with her, be more sensitive and kind, and will try to do more of my church test work at home rather than at the office. I also told her I would not mind it if she had physical relationships with other men if she felt she was helping them. This is hard for her to believe but I think she does a little.

This is written Saturday, July 10th in the afternoon.

Sincerely: <sup>After</sup> "Two days of hell,"  
Your friend T.

BB- 31-a-177

TO: JJ  
From: Terri

Re: TOS

-Went through the two brief cases that TOS left back here and found some things that you may find of interest-

-PASSPORT: His passport has been changed since the time that he went with me to take care of finances; the date of issue of this new passport is Feb. 9, 1977 which is before he was sent down here. This passport has stamped next to his color picture. His passport was issued in SF. It says this passport is issued as replacement & for a lost stolen passport and is limited to expire on Sept. 8, 1977--- extension of validity must be approved by the department. His passport number is K272505. His passport has heathrow stamps-- barbados--trinidad and Tobago-- his passport lacks the double heathrow stamp which is indicative of going into Switzerland so I would doubt that he went onto the continent while in Europe.

- if this passport were to be lost I would say that he would have a difficult time replacing it.

IMPORTANT CONTACT OF STOENS:

Hunter, William G: 751 Longridge Rd., Oakland, California 763-3749

occupation: DA's office SF---Head of Robbery Felony Team--

why this man is important to us:

-in one note book TOS talks about calling Billy H. from London re: suitcase: this would make me think that this may be the same man as this guy in the DA's office.

-in another notebook stoen talks about mailing a letter to Billy Hunter from Barbados-- this is on the same sheet of things to do in the process of leaving the church-- ie send Paula telegram-- write Jim-- contact Matge--- wrte letter to Billy Hunter containing ( and that is all that is said it did not say containing what)

-in a personal address book in TOS black brief case is his address and name again

-in TOS green briefcase is a letter of recommendation from TOS recommending this B. Hunter to be Judge.---- TOS mentions his outstanding prosecuting ability and the fact that he is writing this handwritten from Guyana TOS concluded his letter to the committee of Judicial selection in SF by saying " @ Pardon my longhand, but I am on leave in an outpost in Guayana, and I have no luxury beyond pen and ink.. sincerely TOS../

it would be my opinion that the letter containing thing was that he mailed a copy of this letter to Bill Hunter while in Barbados. ....

I think that Bill Hunter is the one who kept his suitcase in SF and is probably the key to their things-if we wanted to find that out.

Daniel Wienstein: Wienststein sent soten a hand written note--dated earlier this year it says---

Timothy--your work before the grand jury and with the press has been nothing short of sensational. watching you last week was a pleasure, I have numerous comments from lawyers, grandjurors and press exalting your fairness, and professionalism, and human qualities. You are a real credit to this office. DW.

BB-31-a-178

-BANK ACCOUNTS: For sure TOS has a bank account at the Chartered Bank of London--- he has two check books to this effect. Recently used at that. could not see how much was in account as the account was not ~~xxxxxx~~ there. it is the SF branch however 999 Market street SF.

NEWS ARTICLES: TOS has a collection of news articles that has been written about him especially since coming to SF---- re: voter fraud cases.

LEATHER GOOD : Two leather wallets--lots of leather keychains with different initials on them--- two wallets must be for two girl ~~fixx~~ friends. One is blue and the other is red.

BB-31-a-179

TIMOTHY OLIVER STOEN  
DISTRICT ATTORNEY  
SAN FRANCISCO  
APRIL 16, 1977

DIARY 1977  
Begins as;

Page (1) Timothy Oliver Stoen

business address; District Attorney, San Francisco

In case of emergency please notify; †Joel a Stoen, 6698 South Turkey CK. Canyon  
Morrison, Colorado 80465 tel. (303) 697-4726

Blood Group; Positive

Page 3 Swift, Clive " The Job of Acting" )Notes  
Harrap Books £ 2.95 Ppbk )

Page 10 Crescendo Publications 8:00am  
122 Wardour St. Tel 437-8892 10:00am

Page 11 Alexander Technique 8:00am  
Holland Tube Station  
Christine Marie 10:00am

Page 15 8:30 walk to taxi am

Page 19 To do Today 8:00am  
1. Laundry ( 437-7631 9:00 am  
( 42 Cranbourne WC 2  
2. Spotlight -a public speaking 10:00 am  
b. class piano  
3. Call airport re baggage; 11:00 am  
Pan Am 759-2595 11:00 am  
4. Bookstore 12:30

Page 20 1. get baggage from airport 8:00am  
2. 9:30 call Pan Am 759-2595 9:30 am  
3. call smile 589 10:30 am  
4. call Jazz pianist 11:30 am

Rotary Club 12:30 12:30

Wed 30, 1977 [Barry Moughton-Rotary fellow co-ordinator]  
405-7699 (10)

Thurs 31: 8:00 Breakfast 8:45 Tea shirt to laundry  
9:00 Call re Jazz lessons; Dennis  
9:30 Pan Am Sommers Flat 35, Pocklington  
10:30 749-1443; 407-8521  
BANK 11:00 Call Midland; 11:15 leave for haircut  
12:00 Haircut 15 Bronipton Rd SW3  
12:30 589-8355 18334  
3:30 Call David Young -1) Oxford

BB-31-a-180

TIMOTHY OLIVER STOEN  
DISTRICT ATTORNEY  
SAN FRANCISCO  
APRIL 16, 1977

DIARY 1977  
Begins as;

Page (1) Timothy Oliver Stoen

business address; District Attorney, San Francisco

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10:30 749-1443; 407-8521  
BANK 11:00 Call Midland; 11:15 leave for haircut  
12:00 Haircut 15 Bronipton Rd SW3  
12:30 589-8355 18334  
3:30 Call David Young -1) Oxford

BB-31-a-181



- 4:00 2)lums of Court- Lunch Friday?  
353-4165, 353-8588 (Note-tel. was marked out)
- BANK** 6:00pm Call Mike Iedgerwood, Bank of America +  
626-4722  
Vint Law Society-get info on)  
Ox(vd-2) Barrister Admission  
Baker St. 10to 4:30  
Underground stop for  
Listed at top of page--Roland Young +  
353-9119  
Barrister
- Notes; 01-570-8794 Granada Hotel  
Houston-Mrs Landis
- April 1, 1977 9:00 Post office-send telegram to Paula; a) Our friend has  
has me in England)b)Cannot make Timehri c)9me lmas for  
F d; GPO =return address  
12:00 2. call Bill H re suitcase +  
12:30 Dad re money  
5:00 British Museum. Meet Sunday
- April 2, 1977 8:00 Call British Airways  
9:00 American Express Card-6 Hay market  
Bond StBlankets S) New Bond  
Stationery Store-Sinyton 54 New Bond  
Q Qurag-Halkin-Hyde Ark
- 11:30 Language records-  
spanish /French/English  
Books
- [ 1:00 Lu for Bond St. Stn. a)Smgthson 54 New Bond-(1) to s(2)  
BB (3) BH  
6)white house S new bond- Blankets (1) bd (2) m (3)Tom (+)FH
- 2:30 To Hydrop Sm a) girig -9B  
3:00 to Placadely a) 6 Hay market Am Express Fill out appl.  
3:30 to toHeolam a) Foyle's Spanish, Fr , Eva Records am Books  
4:30 a) 12th night c)soap  
6:00 Sandy Olivera Old Vic (Nat Treatre)  
7:00 Waterloo Station  
7:30 Olivera-Julius (AE-greenwich Theatre, Croomis Hill SE10  
8:00 Ceasar  
10:30 Fitzron Tavern, 43, Wrindmeis St. (Goodge St. U)
- April 3, 1977 8:30 Board British Airways  
~~to-confirm-reservations~~(Note marked out)  
Hand evnelope to English Customs OA/Exit
- \* 7:30 Taxi-top of page
- April 5, 1977 12:00 Expiration of 1st weeks's rent-London Musical Club
- Listed under alphabet:  
A ALLEN, JOE&VICKI 462-2587  
Office-Joe: 462-5606, Vicki 462-6470
- AVERY, PAUL C70 LAW OFFICE 563-7704, Sausalito
- ACLU FOR NO. CALIF. 781-2597, 814 Mission St., SF 94103

BB-31-a-182

Anderson, Marin- Dean, Hastings Law  
557-3260

Attorney Printing, 120 Second St, 392-0979

American Friends Serv. Com., N. Cal Reg. Ofce,  
2160 Lake St, SF 94121

Adams Paula- P.O. Box 893, Georgetown, Guyana  
904+11621 Routing; 6152 person to person  
Baynton, Searles & Marge, 711 Willow, 462-4964

Beck, Son & Bonnie 485-0281

Beam, Jack A., 3074 Channel Dr. #203, Ventura

Buford, Teresa J. P.O. Box 4294 Sather gate  
P.O. Berkely. 643-1931, 642-9231

**BANK** Barclays Bank (Mgr. Richard Marks) 981-8090

Bady. Dr. Jack & Mildred, 2119 Hyde Way Visalia 93277

**BANK** Bank of Nova Scotia (La France) 986-1100

Berman, Art. 8920 Wilshire Blvd, 7th fl  
Beverly Hills 90211 655-6080, 657-4010

Bazenore, Março 878-8873

**BANK** Bank of America, 9th & Market 622-4274

Bryant, Larry (Shirley). 402-Elridge, Mill-Valley-383-3987  
178 Reservoir San Rafael 94901; 453-1837

Beverly P Brown 834-4588  
2401 Ivy Drive, Apt 1, Oakland 94606

Bryant,

Carttmell, Susan ofic; 556-2093

Gene & Collier, Leona-626-3365; 552-2667  
1033 Page St, SF 94117

Christian Church (Dof C) Reg. Ofic N Cal & Nev  
111-A Fairmont Ave., Oak 94611., 839-3550  
Noreen, Karl Irvin,

Christian Church (Dof C) Reg. ofic So Calif.  
3126 Los Feliz, L.A. 665-5126  
Exec. Min Dr. Charles Malotte

Christian Church (Dof C) National office  
222 So. Downey, PO Box 1986, Indpls  
46206. (317) 353-1491  
General Counsel Wade Rubick

BA-31-a-183

Catrer, Jared & Bonnie, 2401 Redemeyer,  
462-5866

Cadoo, Donald, 6722 Halm Ave, LA  
90056, Inglewood

Cook, Leo & Carol:n. 462-2243  
Ofic; 462-2604

Coplans, Pat-Archilect, 5th Avenue Marina,  
Fith Ave., Oakland 94606. 839-4171

Chaikin, Eugene B. Atty  
P.O. Box 15023, San Francisco 94115  
-Broker, Cresent Realty, 515 Hayes, SF 94102  
864-3612

(SAA Emergency Rd Svce (SF) ; 863-3432

California Dist Attuys 555 Capitol Mall  
State 1545, Sacts Calif 95814 (916) 443  
2017

BANK  
BANK

Chartred Bank of London, 999 Market  
S.F., S.F. 94103

Continental National Bank

D

Job Dwyer 566- 9671

Denny, Dennis & Pat 462-1072

District Attorney of SF, 880 Bryant St.,  
SF 94103 553-1752  
TOS: 553-1760, Room 325A

Dreyfrss, Joel, 359 Jersey St, S.F.  
94114 647-3751

Davis, Gloria Dudley Store  
Home; 239-1848

Dressler, Alan 633 Baheny St.,  
Suite 635, SF 421-6911  
(w/George Walker)

F

Joe Freitas 681-1168. Two Belmont St. SF 94117  
Ofce: 553-1741 (Margo) Wife : Nan

\* ? { Francoise's Parents: Jean Duffe, Bine-Les  
Olmes, 69490 Pontcharra Sur Turdine  
Phone 179 (40) KM NW of Lyon  
Keys: Anne Marie Lagoulte (90) 36-01-98;  
Vaison La Romaine

Fitzgerald, Martha c/o Cooky  
godward, Castro, Huddleson & Tatum 981-5252  
Inaritime Plaza (Akoa Bldg) Home; 875 Burnettg Ave Apt 2  
Edwards James & Iewnw, 2708-21st St.  
S.F. 282-2540

BB-31-a-184

Furth, Frederick P. 235 Bush, 433-2070  
710 El Camino Del Mar, SF 94121  
751-2716

Finkle, Alex M.D. 563-7701

Franchetti, Mike, Sacto A6 (916) 445-3510

Frolich, John N. 727 W 7th St. Suite  
626, :A 90017. 622-8104  
Home 986-4299

Goldsmith, Ernie & Tanya  
653- 3346

Fitzpatrick, Mike San Pedro JAG (213)  
831-7987 ofc. 831-7305

EZabel 2130 O Farrell St  
San Francisco, California

Frank and Ruth Grech  
2191 24th Ave SF 564-4601  
Bell Market 1333 Castro (24th)  
Ruth work: 826-5241

Garrison, Dave 334-9019

Goodlet, Dr. Carlton 1360 Turk SF  
931-4080 931-4151

Green, Melvina 2274 So. Lotus, Fresno  
266-7854

Glanz, Gary Tulsa 918-743-9805

Golden, John -Judge Superior court lake county  
707-263-5461 ext 234

Peter Hanson 395 Union 391-4182  
DA no. 553-1006,1741,1742,1740

Hodge, Richard and Nancy  
273 Page SF 94102  
548-4128, ofc. 864-5100/251 Tunnel Rd Berkeley

Haugen, Bill and Ester 4th st. North, Staples  
Minn. 56479.

Henderson, Vernell 1660 Page

Hunter, George and Kathy  
22 Highland Dr. 462-6934

Henderson, Kay 2121 Geary #309 563-5320

Halinan, Vinc 819 Eddy 771-6174

BB-31-a-185

Hendersbn, Rick 250 N Hope 462-4630 wife coleen

Howard, Dr. Stan and Thea 1st Christian Church  
100 W School Visalia 93277

Heady, Walter 1380 Rd A RV 485-7788

~~Heard, Steve~~ Attny NY 212-977 9650  
home 1170 5th Ave NY 831-2553

*didn't TOS contact him*

Hernandez, Hank 213-280-9821  
ofc. 288-4276

Hanson, Bridge A  
Marcus and Jenkins  
1 Kearney St 10th floor SF 94108 781-5500  
Raymond Hanson, Jim Milne

Hatfield, Larry 777-7881 (direct)  
777-2424 Exam, 457-7992 (home)

*A A*

~~Hunter, Billy and Janice~~  
751 Kongridge Rd.  
Oakland, Ca 763-3749 zip 94610

*(I think very close to TOS)*

James, Duncan and Sharron S Anter Rd Ukiah 462-1766

Johnson, Joe 1108 Gottingen SF 467-6804

Irelle & Manell Suite 900 Gateway East Building  
Century City, LA 90067 Library 879-2601

JSAC (Joint Strategy Action Comm.) 870 Market Rm 677  
SF 94102 397-0484  
Assoc Director Hohn R Deckenback

Keene, Barry and Lucie Marie  
916-445-8360

KWAN, David ofc. 225-2949 home 221-2207

Katsaris, Steven A Trinity School  
462-8721

Kortum, Bill 180 Ely Rd  
Petaluma 707-762-6219

Lipset, Hal 421-9137  
David Fecheimer, Ralph Bertsche

Langston, Adrian 1731 Hayes SF 922-3947  
Ethel and Fletcher Mother- Thelma 15C7  
McAllister--

Layton, Carolyn 485-8891 (louise\*)  
Dr. John Moore 445-848-8532

*Bb-31-a-186*

Lawyers club of SF  
Jack Tar Hotel 1225 Post 673-3850

Larson, James and Diane  
964-4289  
ofc. 964-4044

~~Londen Musicz Club~~  
21 Holland Park  
Londen, W11 3TE 727-4440., 727-7094

Moscone, George 558-3456, 3458

Matthews, Joshua 71 Lefters Pl Brooklyn NY 11238  
212-783-6546

McHarg, Gerlad 213-968-4084

Malotte, Charles and Sue 213-985-1631

McKusick, Paul 7051 Bowling Dr.  
Sac. 95823 916-392-1649

The Honorable Wallace D. Muhammad  
4855 So Woodlawn , Chicago Ill 60615

Mapes, Marge 415-285-9057 — *secretary?*  
1383 DeHaro St. SF 285-1981

BANK  
LONDEN

Midland Bank Limited  
International Division  
PO Box 181  
60 Gracechurch St.  
Londen EC 3P 3BN  
ref. AH 33/E 606-9944

*(By diary I think funds transferred from BofA to here)*

Oliver, Tom (attny personal injury)  
#1 Wilshire Blvd. LA

Olivari, Ruthann 130 Harbor Dr.  
Half Moon Bay 94019  
728-7438

Richard Peterson 462-5607

D Persaud; Georgetown Guyana (Supt. of Mails GAO)

Riodan, John 928-2333

Rossman, Jerry Atty 1310 Haight st.

Roberts, Dennis 527-3302, 526-0880, 526A0958)  
111 Broadway Oakland, (465-6363)

Stoen, Joel A; 6698 Sp Turkey Creek Canyon  
Morrison Colo 80465 303-697-4726

Stoen, J. Thomas (sara) 32 Sanford Rd  
Colo Springs 8-906

*BB-31-a-187*

(7)

Stoen, Jonathan B (Francoise) 303-697-9658)

Stoen, Marty 1171 Westminister, St Paul  
55101 (612) 771-9795

Stoen, Anne 4th St North, Staples Minn  
56479 218-894-2684

Synonon--444-3624

SF Equality Action: 515 <sup>H</sup> Hayes SF 864-3612

Success Mial Service  
1021 S Linwood  
Santa Ana, California

*he pays checks to this!*

Stoen, Cliff and Alice  
213-379-2133

Taroc, Jan Oshira (court reporter) 557-0600

West, Don (Bonnie) Mill Road Farm  
Lake Forest, Ill. 60045 312-234-5343  
ofc: 751-2446

Winslow Bob (Betty) 506 N Bedford  
Beverly Hills 90210 213-276-8492  
ofc: Irell and Manella 277-1010

Weinstein, Dan 668-0577  
42 Sixth Ave SF  
Napa Residence 707-963-7456

Wiekig, Rich (USC Law) 4262 W 1st st #209  
LA 90004 388-0886

Whisman, Fred 751-7815

Zola, Michael  
Director of state OEO Services  
916-322-2940 // 555 Capitol Mall Rm 325  
sac home: 2800 Castro Way Sac. 95818 916-455-4970

-----Personal Meroranda

Locker 16: 28-4-22

Grave birthday: April 9

wedding: June 27  
child birth: Jan 25  
grace SS# 563-88-0448  
TOS: SS# 521-46-0-138

*BANK*

Bof A courtesy check guarantee: GO 128-3-50179

Jonathon: Aug 15  
Tom: June 20  
Dad: Sept 20  
Mom: March 14  
Parents wed: April 15

*BB-31-a-188*

(8)

drivers license No: PO 335276  
1968 Toyota: VW T68R T5215326 Lic 966 AWW

shirt # 34  
dresses 10  
shoes 8M  
hoisery 5'6 ---Grace

PT Fed Ex Id No: VT \*\* 94-2147086  
State franchise D-500544  
Disciples Fed. Tx Exempt No: EIN 35-086 8116

B of A 9th and Market: SF 2-3429

BB-31-a-189



August 12, 1976

RESUME OF TIMOTHY O. STOEN

1. Vitae: Age 38, male, married (Grace), one child (John Victor).  
Address: P.O. Box 933, San Francisco 94101  
Telephone: 553-1895
2. Current position: Assistant District Attorney for City and County of San Francisco. (Primary current assignment: Supervise Voter Fraud prosecutions; *Supervise special prosecutions / organized crime*)
3. Legal background: Stanford Law School (Doctor of Jurisprudence); admitted to U.S. Supreme Court and California Supreme Court; appointed by Governor Brown to State Advisory Committee to Federal Legal Services Corporation upon recommendation of Board of Governors of California State Bar; served on State Bar Ad Hoc Committee re Local Governments; operates legal clinic for poor each weekend, alternately in San Francisco and Los Angeles.
4. Education and professional background: Graduate Fellow to Europe (Rotary Foundation); B.A. in Political Science from Wheaton College, Illinois; six years Assistant D.A. for Mendocino County with County Counsel duties; two years Deputy D.A. for Mendocino County as prosecuting attorney (one year as chief); one year as Directing Attorney of Legal Services Foundation of Mendocino County; one year as criminal defense attorney; ordained minister in Christian Church (Disciples of Christ) denomination.
5. Memberships: American Civil Liberties Union, NAACP, San Francisco Lawyers Club, San Francisco Bar Association, American Bar Association, California District Attorneys Association, Actors and Others for Animals.
6. Hobbies: Intellectual history, political science, jazz.

BB- 31-a -190

December 8, 1976

I, Timothy O. Stoen, have not had any sexual relations of any sort with any person since April of 1973, with only one exception, i.e., Edith Roller, whom I see approximately six every 3 months.

Timothy O. Stoen

BB-31-a -191

To: Jim Jones

From: Jim Stoen

Re: Sexual Experiences

1. July or August 1963 - penis ~~touched~~ <sup>handled</sup> by a James Jewell (hand) whom I shared a bed with on outing in the hotel of a town located near Sutters Mill, California.
2. December 1967 - slept with Joan Adham on Hopkins street, Berkeley - no intercourse though penis touched.
3. 1968 - 4 or 5<sup>(2)</sup> occasions with Joan Adham wherein heavy necking, occasionally penis touched - no intercourse
4. August 1969 - 1st experience of sexual intercourse - with Rosemary Savage, in Berkeley at home.
5. August 1969 - slept with Nancy Morrison in Berkeley - no ~~physical~~ <sup>sexual</sup> intercourse though penis stroked.
6. July 1969 - March 1970 - necking with Rosemary Savage on various occasions, including her handling my penis and my kissing her nipples.
7. January 1970 - ~~physical~~ <sup>sexual</sup> intercourse with Rosemary Savage
8. March 1970 - June 1970 - slept occasionally with future wife Grace Grech - no sexual intercourse
9. June 27, 1970 to present - sexual intercourse (vagina-penis) with wife Grace - at 1st every night now about 2 or 3 times per week, kissing by me of her nipples, occasionally kissing by her of my penis.

I think that's it. Jim Stoen

BB-31-a-192

Very Personal - For Jim's Eyes Only -

Re: Problem with wife - From T.

To: Jim: BE CAREFUL: My wife is about to ask you some loaded questions. Please be advised about the following train of events:

1. On ~~Friday~~ Thursday, July 8th, my wife at work stated she "couldn't go on" living with me because I was chasing other women in the church and that she must not be meeting her ~~own~~ my needs, that I was immature to have to do this, and that she was tired of people laughing at her because of the rumors circulating about me, and that people looked at me as if to say "what's with him, anyway." She cried, and said her pride couldn't take it and that she was leaving me.

2. I argued that I was not "chasing" women, that I wanted to "help" women who didn't have needed attention based on respect as well as physical and that she could know this by the fact that the three women who I had shown an interest in were not at all the ~~typical~~ beauty-queen type I had always previously been exclusively interested in. I said that if her analysis of my motive were correct I would be chasing Sandy Ingraham and not M.B., or L.A., or L.S. She replied that I admired strength (and therefore found it in L.S.), wisdom (in L.A.), and black sexuality (in M.B.) <sup>and she said she had promised before we got married that I could go out with other women and she could not accuse me of duplicity.</sup> She did not deny this (for she had ~~so~~ <sup>she</sup> said it would be O.K. to go out and I shouldn't be a slave, etc - although the reason she said this probably was due to my telling her before the wedding she was free to go out with other men if she wanted to, etc).

3. She specifically asked me question after question about L.S., including: "Tell me, yes or no, did you ever place [L.S.'s] hand on your penis, of all places, in your office and did she find this revolting?" I hesitated for a quite a few moments + quietly said "yes." I did so because I felt that the question was an acid test of my willingness to be truthful and that she was truthful in saying she had reliable sources for this knowledge. I then said I didn't know she found it revolting.

I felt two inches tall as I saw her cry and heard her accuse me of using her, letting her cook my meals, clean the house, wash the clothes, have no spare moments for her but have them for other women.

4. She said that L.A. had come up to her and said "that [T.] of yours doesn't turn me on at all." [I had asked my wife if I could have physical relations with L.A. because she needed them, and my wife had then said O.K.] Ever since approaching L.A., L.A. has been aloof and a trifle hostile - she has stated to my wife I have an ego problem.

BB:

31-c-193

I drove down that afternoon with my wife to see her gynecologist. She told me I don't know how to deal with people and am ~~too~~ insensitive and lack empathy. I can now see that substantially she's right.

During the course of the <sup>afternoon</sup> day I cried myself and felt near-hysterical at the thought of losing my wife, whom I really do love (insofar as I know anything about it, which, indeed, is limited). She said I didn't want to lose her because of embarrassment in the eyes of my friends and of my church. I reaffirmed over and over that I love her. (Incidentally, my wife was very shaken up by the Wednesday night meeting. She feels that everyone is going to hate her for being pregnant, as evidenced by L.S.'s remark that people who have babies should pay for them. After the comment about the big wedding, she said she wanted to scream and run out of the church. She is particularly uptight at the fact that various men think she has wanted to fuck them because she has been friendly to them - she is irate about this and tends to compare outside men as more decent in being able to relate to her without ulterior motives.)

XX Anyway, the main problem came about on the way home from Santa Ana. She kept asking me about L.S. and whether we had ever held hands. I answered yes. She then asked: "Did you ever kiss her and did she ever kiss you?" Figuring she knew I answered "yes." Then I saw a look of shock in her eyes and sensed that I must have tarnished your standing in her eyes. L.S. She stated she was going to leave the church, that she just had a very important question to ask you, that she wanted to reach you wherever you were. (I became near-hysterical, feeling I was responsible for her leaving the church. She calmed me down.) She asked me how long this had been going on. I said "two months." (It then dawned on me that what probably happened is that XX you had told her that L.S. had found my touching her revolting. I had stated to my wife before this point that I XX didn't actually think L.S. found me revolting and was surprised to hear her say that, that I thought L.S. liked me. She <sup>had</sup> said "don't you know, that relationship is rigged. L.S. doesn't like men. What makes you think she would like you?")

B13 - I know the only thing that keeps my wife at the church is her belief in you. I felt terrible about saying L.S. liked me, and 31-a-194 I tried to explain that my ego is so great I could not, until now,

even accept the thought that a woman would not like me and thus my vision was distorted, as was my judgment, about the whole thing.

(What amazes me is how she learns all these things. She says that L.S. and L.A. have compared notes about everything I say or do so either, that Edith B. knows about M.B. and won't look my wife in the face, and that P.C. thinks I took a physical interest in her daughter T. because I had told her how beautiful I was and T. had told her mother I put my arm on her shoulder. I did not take a physical interest in T. and my wife does believe me on this. My wife states that K.L. went around telling people I was "compensating" with her. I ~~was~~ <sup>was</sup> not, but only after K.L. had first started to ~~push~~ <sup>push</sup> her arms against mine when we were sitting discussing business ones. ~~I think~~ <sup>meanwhile</sup> I've commenced adopting a 6 inch rule like at Bob Jones University with respect to K.L., L.A., and anybody else my wife might be concerned about. K.L. is the only person other than those mentioned herein I feel I have compensated with. I feel terrible in having to burden you with all of this, but I do so only because you asked me to write down my feelings in an effort better to understand myself.

I tried to repair the damage and be as objectively truthful as possible that night in bed. (I had started packing my suitcase telling my wife I was not fair to cause her so much hurt. (I had previously reminded her that the S — way was to share husbands and wife and that she was not willing to be S —. That did make an impression, I think, for she shifted her tone a little bit and became more calm in saying that maybe we should not live together because we had different philosophies and she wanted me to be free.)

<sup>in bed that night</sup>  
XX I said "you know, —, I was wrong when I told you L.S. liked it. She was cold, really cold. Now I'm starting to see this. I pushed myself on her and couldn't until now only myself to believe she didn't want me to touch her."

XXXXX Then ~~the~~ my wife said "Now this is extremely important to me. I must have the exact answers. When I ~~was~~ showed shock in my face it was not because of what you said, it was about  
XX someone else." BB-31-a-195

She then asked the following Questions:

X 1. "When, before M.B. or after, did Jim tell you he wanted L.A. and you to get together?" My answer: "After - 2 or 3 weeks ago."

X 2. "Why did you at first, upon M.B.'s bringing it to my attention, first try to bring Jim into it saying Jim felt she needed a physical relationship? (Maybe she said: "by implying Jim wanted you to do it.") My answer: Jim never told me he wanted me to relate to her physically. I just assumed it because of what he said about her being one of the most sexually deprived women in the church. I misunderstood him, which became clear to me upon reflection."

X 3. "Did Jim not come to you and say 'What's the big idea saying I asked you to get involved with M.B.?' My answer: "No, he didn't; nothing of the sort." Patty's note

I found this stuff about the relationship of yours

X 4. "Why are you doing all this. Did Jim ask you to get involved with M.B.?" Answer: "No, I just felt sorry for her, particularly after watching her cry out her frustrations ~~and~~ at not being an intellectual etc at Linda Moros one night!"

X 5. "Did Jim ask you to get involved with L.A.?" Answer: "No, I just felt she was sad and it would be therapeutic to have a ~~sex~~ physical relationship with someone who respected her."

X 6. "Did Jim ask you to get involved with L.S.?" No, I felt sorry for her. She was having a hard time with her ~~husband~~ who wanted sex and she didn't. I respect her immensely. It was mainly brother-sister type. I consoled her. I have never had sexual intercourse with her and I do not intend to."

X 7. [Asked before this: "You love L.S., don't you?" Answer: "Yes, but not in the way you are thinking. I could never be married to her. I want a deep friendship with her. You are, and I swear ~~in my child's~~ life, the woman I want to live with."]

BB-31-a-196

After these questions my wife did not specifically say she wanted to talk to you. But she did later ask something vague about it.

She did sleep with me that night. But she was too distraught to go to work Friday, so she stayed home until 3 p.m. and I stayed home with her.

I told her I do love her, that I am willing to give those outside affairs up if it means not losing her, that I will try to spend more time with her, be more sensitive and kind, and will try to do more of my church test work at home rather than at the office. I also told her I would not mind it if she had physical relationships with other men if she felt she was helping them. This is hard for her to believe but I think she does a little.

This is written Saturday, July 10th in the afternoon.

Sincerely: <sup>after</sup> "Two days of hell",  
Your friend T.

BB- 31-a-197



RESUME

Timothy Oliver Stoen, Age 36  
6300 Eastside Calpella Road  
Calpella, Calif. 95482  
Telephone (707) 485-7696

copy submitted to  
Min of Home Affairs  
Dec. '73



Married, One Child  
Citizenship: U.S.

OCCUPATION

Title: Assistant District Attorney for the County of Mendocino, State of California. Salary \$20,074/year.  
Responsibilities: Regular legal advisor to the Board of Supervisors; Chief civil trial lawyer for county; advisor to Sheriff; Surveyor, Agricultural Director; Building Inspector; Health Department; Planning Department; Public Works Director; Auditor-Controller; Supervisor of three other lawyers.  
State Bar of California, Admitted 1965 (also, United States District Court)

SKILLS

Lawyer (Trial, Research, Administrative, Criminal, Poverty Law)  
Community and Business Organization  
Journalism  
Teaching of College  
Law Enforcement

EDUCATION

High School Diploma (1956)  
B.A., Wheaton College, Wheaton, Illinois (1960)  
J.D., Stanford University Law School, California (1964)  
Rotary Foundation Graduate Fellowship - to England, attended Southampton University (1961-1962)

EMPLOYMENT

Staff Lawyer, Legal Aid Society of Alameda County, California (In Oakland black ghetto, advised community organizations)  
Criminal Defense Lawyer, San Francisco (retained by black liberation groups)  
Directing Attorney, Legal Services Foundation of Mendocino County (rated in highest two in State of California, O.E.O. rural programs)  
Deputy District Attorney, County of Mendocino (Chief Prosecuting Attorney)  
Civil Engineering Statistician, Coppco Concrete Pipe Co, Colorado

ADDITIONAL INFORMATION

Reserve Deputy Sheriff (1972 to present)  
Member, Ukiah Rotary Club (1972 to present)  
Chairman, Northcoast Opportunities, Inc. (Primary community action agency in county) (1972)  
Invited Speaker/Panelist: California State Attorney General's Annual Conference for District Attorneys and County Counsels; California Planning Commissioner's Conference; Eagle Scouts of Redwood Empire  
Temporary Chairman, Mendocino County Branch of the Heart Association of the Redwood Empire, Inc. (Presently)  
Member, Board of Directors, Christian Church (Disciples of Christ) for Northern California - Nevada (1971-present)

BB-31-a-198

RESUME

Timothy Oliver Stoen

Page Two

ADDITIONAL INFORMATION (cont.) Sierra Club Litigation Committee (1968 to 1970)  
Chairman, Board of Directors, Peoples Temple Christian  
Church, Redwood Valley, Calif. (Present)  
President, Mendocino County Bar Association (1972)  
Member California State Bar Ad Hoc Committee  
on Local Government (1972-1973)  
Free Legal Assistance to the poor (primarily black)  
every week-end, since March 1970 to present in  
Los Angeles, San Francisco and Redwood Valley  
Past Skills: Wrestling and Horseback Riding

BB-31-a-199

8.3/4/4

\* Information to be supplied by persons desirous of immigration into Guyana.

1. Full Name (Block Capitals; surnames first).....STOEN, TIMOTHY OLIVER
2. Address..... 1033 PAGE STREET, SAN FRANCISCO, CALIFORNIA
3. Nationality..... UNITED STATES
4. Date of Birth..... JANUARY 16, 1938
5. Place of Birth..... WISCONSIN, U.S.A.
6. Profession, trade or occupation..... Assistant District Attorney
7. Married or single..... Married
8. Wife's (Husband's) name and nationality..... Grace Stoen - U.S.A.
9. Names and dates of birth of dependent children..... John Victor Stoen - Jan. 25, 1972
10. Schools and other educational institutions attended and periods of attendance  
High School Diploma - Littleton High School, Littleton, Colorado, U.S.A. (1956)  
B.A. Degree - Wheaton College, Wheaton, Illinois (1960)  
J.D. Degree (Doctor of Jurisprudence), Stanford University Law School, Calif. (1964)  
Rotary Foundation Graduate Fellowship - to England, attended Southampton University (1961-1962)
11. Academic, Professional, Technical, and other qualifications Lawyer (Trial, Research, Administrative, Criminal, Poverty Law), Community & Business Organization, Journalism, & University Teaching of College, Law enforcement
12. Assets (including cash)..... Assets to be imputed to Peoples Temple Agricultural Mission
13. State whether you are prepared to work and live in the interior of Guyana  
..... Yes:.....



BA- 31-a-200

14. Details of any farming experience. Organic gardening. ....

Declaration: I certify that to the best of my knowledge and belief the foregoing statements are true and made in good faith.

*Amethy C. Allen*  
Signature.

\* The applicant is also requested to submit, together with the information furnished above, a certificate from the police authority of the country (or countries) where he (she) has been resident during the last ten (10) years; to the effect that there has been no conviction against him (her).

9/24/79

Notes from conversation with Marie Duckett, a.k.a. Lawrence. a.k.a.

RE DAVID WISE

Summer of 1975, in San Francisco. She was security. Working on the third floor. D.W. was living there at the time, as he had recently returned from being "out" of the church. She saw him come down Webster to church about 6:30 on a Sunday (thinks she saw him coming out of a car) and go direct to the third floor where he stayed. She asked him where he had been and he said to the store but there were no stores in the area open on Sunday evenings. A few minutes later she saw him screwing one of the receiver ends on to a telephone (extension by the end of the hall), and a little later doing the same to telephone in the hall near the door to the balcony and insert something into it up, told Mac who inspected the phone and found "bugs" in all the phones, (a p j j). This precipitated a meeting with DW over the matter.

also describes a welfare fraud case TOS advised on, and a plan for "revolutionary act" which she discussed with T.O.S. at JJ request.

(She doesn't know anything about any attempt to place a tape recorder on the circuitry in the area behind the closet)

INTERVIEW TAPED Reel 1, side 1 (first 2/3)

BB- 31-a - 201

To Jim  
About what I would do to avenge Tim Stoen, etc.  
from Teresa King

Tim Stoen took his first step toward becoming a reactionary when he left here - it was only a matter of time until he joined the conspiracy. As a house nigger he must appease the master by selling out his brothers - the field niggers. I do not believe the money is important to him. I feel that it is a test - as the issue over John was a test. They are looking for your Achilles heel. They lost the game here + they know it, so they are testing you thinking that you would stand by your people to the last man. Any sign of weakness would only worsen the fate of our family members still in hell SA. Your badass won the battle here + only the same will win the next battle - not that winning is guaranteed - but you've taught me that to live + die a Communist is all that matters + all that revolutionaries have ever had to do is liberate + spread the word round.

So much for the general gibberish + to the brass tacks. I wish I could think of some brilliant strategy to save the family + allow the brave souls that have been holding the fort for us to have the opportunity to breathe the air of freedom. I know that most of them deserve more than I to be here, they've given more + suffered more, and I feel guilty for that. I also feel guilty that I had an alliance with Gary + his + Joyce + Grace + Jim + as many others as I could gather into a room + blow up. I propose setting up a lovers quarrel + letting it be known as such, but the suspicion could be held in the heart of our enemies that they are next.

Gary is now a personal enemy. It was a sign of my low state of revolutionary development that I excused his weakness + indulged my sentimentality towards him. However in forming the alliance I learned how to manipulate him + could once again pull his strings. I learned to be as much a fucker as any other male despite his homosexuality.

I propose that we set up a fake escape for me - that I go to Georgetown on medical reasons or whatever + that I go to the American Embassy + ask to go home. Upon return I could go to Tedders in Nendo Park + try to get my job back, contact Gary's parents in Palo Alto + wait for him to contact me.

I could let Gary play a "side" for me in de-programming me, which he would let up. As I seem to buy his rationalizations I could suggest a meeting with the Steens + their benefactors supposedly to hear the real story + to sell them some disclosure - just what I don't know enough to get them to bite + not enough to cause any harm. At the meeting I could produce a homemade bomb + blow us all to bits - that way I would not be available for jail, torture + use against the cause - also it could be part of a jealous suicide story. I'm sure I could resume a perverted & actual contact with Gary acting as a female front for him to prove that he could get a woman if he wanted + to cool relations with his parent + to be a mama to him. However he would never give up his boy friends, in fact he is probably fucked around with several of our enemies + would undoubtedly brag about it. I could act jealous which he would love. I could write "love sick" poems + letters lamenting my jealousy + predicting my violence. This is in keeping with my past enough that I'm sure it would sell. In fact one of my old enemies at Keplers could be provoked + would undoubtedly love to testify of my violent tendencies.

In the meantime I would like to set up a racket at Keplers to mail out books to a fake company to build up our library. If I could get back into the bookkeeping + the mail department I could do it easily. If I went back to work at starting pay (1/2 of what he was paying me) I'm sure he would hire because the store is now full of inexperienced people + I would work my ass off. I could mail them to myself + perhaps they could be "stolen" from me - some way to leave no trail to the church. For I am to be a returning bourgeois discontent that wants to do her own thing + to forget her responsibility to starving babies.

I would consider it an honor to die if I could take those fuckers with me. I would not have the clean beauty of dying with Atlas in hand defending our homeland but it would be a satisfying revenge.

Thank you Jim.  
Teresa King

P.S. I was never really an intellectual -  
I was a house nigger to intellectuals.  
I have you to thank for taking me  
from that prostitution.

BB - 31-a-203

Dad:

I have a Daughter that Look  
Very much Like Me and May

be she Could dress in Some of my  
Old Clathing that she have and

Pass as Me

Ruby Carroll

BB-31-c-204



12/17/77

Dear Dad:

Several years ago there were some persons against Peoples Temple and you told us to meditate on them at 6:00 A.M. and 6:00 P.M. every day and repeat the following: "Father, vengeance is yours, you will repay." We did according to your instruction and the results were positive:

I suggest that we, as a group here, do as I have stated above in regards to the ones who killed our Comrade, Chris Lewis, and I positively believe that his killers will get what they deserve for their crime.

Thanks, Dad,  
Rosa Heaton

BB-31-a-205-

Dear

Dad

that what after tim stane have done to ya.  
and betrayed us and went to the news paper  
and talked about us so bad I don't think  
we should give that honky fide bastard  
not one penny thats my fillings about time

David

BB-31-a-206

DAD  
I Think Something Should happen to him  
That would lay him up in bed for weeks  
maybe beat Bradley or Run over by a car  
And then send him a thinking of you  
card saying Get well soon I will never  
forget you with I will never forget you  
under lined in Red Signed Joyce McIntyre  
re me - then go hide out some where  
until he get better and if he dont see  
giving us Presear I would come out  
And Kill him Discommuncate my self  
with the church saying im not a  
member of the church saying im not a  
member of the church saying im not a  
for the merder of Prigo to jail  
Joyce McIntyre

BB- 31-a-207

TO DAD

DAD. WE ALL KNOW THAT BLACK-MAIL IS A DOUBLE CROSSERS GAME AND YOU HAVE TO PLAY BY THEIR RULES. THERE IS ONLY ONE WAY TO PAY A BLACKMAILER OFF TO INSURE YOU'RE NOT BOTHERED AGAIN, AND MY FIRST THOUGHT FROM THE STREET WOULD BE TO MAKE A FINAL PAYMENT. BUT WE HAVE TO REMEMBER THAT HE IS A PART OF THE CONSPIRACY AND THE WHOLE THING COULD BE A SET UP, IN WHICH MARRI'S PLAN FOR A SEXUAL MURDER IS THE ~~THE~~ BEST I CAN THINK OF, OR A VERY WELL THOUGHT UP ACCIDENT. I DON'T KNOW ANY OF THE ENEMY. (BUT ON THE OTHER HAND, THEY DON'T KNOW ME EITHER) SO I DON'T KNOW IF HE WOULD LET HIMSELF BE SET UP AS A TARGET. IN ANY CASE IF HE

BB-31-a-208

IS SET FOR REMOVAL AND IT CAN  
NOT BE TRACED TO THIS CAUSE, I FEEL  
IT WOULD REACH THE OTHER TRAITORS  
AS A THREAT AND MAKE THEM MORE CLOSE  
MOUTHED. AND I DONT FEEL HE CAN DO  
ANY MORE <sup>HARM</sup> ~~GOOD~~ DEAD THAN HE CAN  
ALIVE. IF A SEXUAL MURDER IS  
PLANNED DONT USE A GUY SINCE MOST  
HOMOSEXUAL'S IN A SLUM AREA  
WHERE HE SHOULD BE FOUND WOULD  
USE A KNIFE. AS FOR THE PART I  
COULD PLAY. AS I SAID I AM NOT  
WELL KNOWN OUTSIDE PRESENT MEMBERS  
AND I AM MENTALLY <sup>CAPABLE</sup> ~~WILLING~~ TO  
ELIMINATE A PERSON. I COULD USE  
A KNIFE BUT I PERSONALLY PREFER A  
GUN. MY HEART IS WITH YOU UNTIL THE  
END AND WHATEVER YOU DECIDE YOU  
CAN COUNT ON ME

BB-31-a-209 THANK DAD  
Odell Rhodes

Dec 20-1977

Dear Dad,

It have been mericals done on meditations  
If we meditate your power can strike him  
down. He had his plans made up. We need our  
money, Dont give him a dam thing.

Cornel Mc Lawton

BB-31-a-210

Dec-16-77

Dad,

I have been a ASS And  
not a good steward As I should  
have been I have taken Exter  
Porshion of Food And I knew  
Better.

I have had sex with Pearl Morise  
before I left San Francisco  
I also had sex with Joana-  
Garvin.

For my Behavior on yesterday  
I will have one meal & Day for  
Two weeks

James Edwards

BB-31-a-211

WHAT I CAN WRITE TO DO

Before the experience on the frontline, I could not have said what I say now, at least not with the level of conviction and commitment that I can feel. I would die for you. I would look upon dying as an accomplishment which I was unable to achieve in my lifetime - which is to be one with the people I see myself as an unassuming, intellectual who is doing for less. Then I could overcome my ~~limits~~ upbringing, class, race, privilege. In dying, that would be the ultimate overcoming of these handicaps. But I must point out one thing. Dying would be easier than living life with the constant struggle keeping opponents in my mind. The constant struggle to establish affinity and comradeship and loyalty with the people. I have actually begun to see what you mean that dying is much easier than living.

In some ways, I would be glad to die or glad to prostitute myself or be what's necessary to serve the cause of you stand for and see dying so patiently and so lovingly to teach us to stand for.

Your daughter,  
 Jane G. [unclear]

BB-31-a-212



to Dad from: Lann Burton STRATEGY: WHAT I'M WILLING TO  
SEE DO

One of the best suggestions tonight was that we could scare  
Storn by an anonymous shot in the dark. The problem with that  
is the possibility of the pigs connecting us with that shot.  
When you've got conspiracy charges against us, conspiracy to  
murder, to harass, to intimidate a witness (if there's a trial  
pending against us). The one big problem that I see  
with any act of reprisal against Storn is the gov't  
slapping all of our remaining comrades w/ some conspiracy  
charge and sending them with notice. Once served,  
that may change your capacity to leave the country.

I have a couple of blind spots in my analysis of  
Storn. I don't go to bed and see all the information  
he got from the meeting. He attended and being in lead-  
ership in office. I know of at least  
one conspiracy charge we're guilty of - mail fraud  
(both in federal and Calif. offense) there must be others -  
other fabricated long message. I know of at least  
one. I think if you don't pay the bill we will need to know  
a-s-a-p. I don't know if he will retaliate by working for  
gov't trying to stop our people from getting over here.  
About a week after I spoke tell him up someone should  
schedule a flight and attempt to leave for Guyana.  
I think a white, intellectual, lawyer like Storn  
is the type of person who might cast himself in the role  
of calling your bluff. He may be that possible: "Will you  
stones really to me in if I try to stop his people?"  
I'll remember that he could beat the charge of  
being intensely internally suicidal after all he's done. That's  
a possibility, but I don't see of the opinion that he  
is too scared to do so. I'm naive in his estimation of what  
we'd do to him if he tried to prevent the rest of the  
family from getting here.

BB-31-a-213

Dear Dad,

I'm so sorry about  
our comrade Chris Lewis.  
I did not know him personally  
but I do know he was one  
who would have done anything  
to protect you.

I feel that we owe it  
to him and to ourselves not  
to let these murdering capitalist  
get by with this. We have  
been peaceful revolutionaries  
up to now but they broke  
the peace first so maybe  
now is the time to start  
fighting back. I don't know  
what tactics could be used  
but I know that I would  
personally like to kill the  
bastards that took the life  
of a dear comrade and those  
that attempted to get at our  
mother and cause her harm. I  
know that I am a revolutionary  
and if that means fighting or  
death then I am ready for  
that. I know that when I  
die it will be for socialism.


Thank you Dad  
Bonnie Simon

BB-31-a-214

TAKE CARE OF STOEN, MERTLES +  
COBB. —

PUT 1ST PARTIES <sup>(STOEN)</sup> LIGHTS OUT DESTROY  
RICHMOND PROPERTY OF MERTLES, DESTROY  
SOMETHING OF COBB — HIS PRACTICE OR SOME  
POSSESSION (VEHICLE)

AT SAME TIME DESTROY SOME  
PROPERTY OF OURS → SOME HOUSE OR HOUSES  
WE'VE ACQUIRED OR S.F. TEMPLE — MOVE  
MAJORITY OF OUR FOLKS TO L.A. SO<sup>#</sup> PROJECTS  
MIGHT BE CONTINUED — FOLKS COULD  
TRAVEL TO L.A. ON AN L.A. WEEKEND!

  
SOME ACTION SHOULD BE TAKEN  
IF AT ALL POSSIBLE WITHIN NEXT 2 WEEKS.

BB-31-a-215

Dear Dad:

I think we should have one of our  
People, who they would not suspect  
to infiltrate their dam  
movement to destroy the light.  
have one of our people get in  
with them then either find  
out information we need or  
information to know when  
~~the~~ Stone is going to be alone  
then kill him and when  
they do either steal his money  
or dress him up as a Transsexual  
so it would not look like  
we had any thing to do  
with it.

BB-4 31-a-216

I think he should be killed  
Because he doesn't deserve to  
live. P.S I think he is  
saving his face know and  
when the cops get  
done with him they  
will give him justice.

Thank you DAD

Tom Kutula

BB-31-a-217

Dad,

My suggestion for Tim Stoen is to have some people break into his house beat him half to death. Stay their for one day at least, making him feel he was on the verge of death. Scare him so he would stop these threats. I think those people, could then go into hiding and return or come to ~~the~~ Jonestown when out of danger. This is if we want to ~~be~~ let people know we won't put up with bull-shit. Like you said, they came for & killed Martin Luther King Jr. because they knew ~~they~~ <sup>his</sup> people were passive. We have declared in the states that we were non-violent but we'll stand together. Those fools are pushing us. I am willing to participate in any type of plan necessary. Some must die in a revolution. Some may fall at your right and some at the left, as long as 1,000 more ~~are~~ who will rise up to insure communism in this land. Dad, remember they wouldn't suspect me. A lady, young, can appear weak. They would expect someone big and man or someone in the cause they know. Dad remember I'll go or do any mission. If I would have to take my life also, that's good, ~~at~~ as long as the greater number survives and this movement goes on. I owe my life & ~~keep~~ eyes to you. We'll persevere, we have the greatest leader & teacher in all lands.

Thank You Dad,  
Shanda M. Olivee

BB-31-a-218

Dad i dont thank you should  
let any body black mail us and i  
thank Tim Stone should be killed  
and all the others traders that has  
left us i thank you should let out  
side help do the job for us or if  
nervous we all go back and kill all  
the S.O.B.S. i dont like killing but  
this is the only way that we  
will be let alone thank you dad  
for this beautiful land and every  
thing els

Carrie Langston

BB-31-a-219

I hope some of these ideas can be used to wipe out Stone's white ass out hunky ass.

Dad, I (Patsy Johnson) am willing to kill anyone anywhere. It may mean my life or going to prison. I don't give a damn. Operative Stone. We want his ass out.

I do feel that Jim is asking for this money knowing that we need money ~~to~~ to get our people here. ~~Now~~ Jim thinks that you dad would pay him this amount of money knowing Mama will the money you pay to him can and will be used to bring our people to freedom. Dad I would gladly go under both to pledge my life to take Jim's life, Alton, and anybody else. Fuck life, it's hard as hell to live. You have to worry about so much. To kill anybody for this cause is a big ~~release~~ release of tension for you, the cause and myself.

Jim has a sex problem. He could be pressured by phone calls. You wouldn't have to say anything. You just call him at his home and hold the phone. Then hang the phone up. All of these calls will come from a phone booth. The area of dial must be different each time. Now he'll wonder what's going on. He'll look for some kind of out ~~would~~ ~~would~~ would cause him to go to a bar (gay bar) drink and look for some sexual action. He's depressed at this time cause the phone calls are driving him mad. At a gay bar anything can happen. He could be given a smickey, he could be given a drug to cause him to ~~has~~ ~~suicidal~~ suicidal and at that time you could trip anyone

BB-

31-a-220



one out. I don't know if Tim has ever had anything to do with drugs. But I could sure as hell get some acid and catch him to flip out. Even Angel dust ~~you~~ would do it. And he ~~is~~ would have to be done via to get him to feel for a gay guy and give Tim the drug. ~~1st~~ The guy would have to play up to him. Tend to want Tim sexually drug him up really good to the point he can't help himself and off him. It could also look like ~~suicidal~~ suicidal. He could be in a car wreck. He could also be ran off the side of the road off of a cliff. He can be ran into from behind and into something. ~~He could be beat up~~ He could be watered and that attacked one night and stabbed from behind or it makes me know different face to face and I'll stab the ~~finger~~ finger to his painful death. All I need is his ~~throat~~ throat to cut into. Oh yes someone could be willing for Jim at home (this is back to the drugs story dad) with a keps that has heroin, it could look like and S.O.D. A bomb could be put under his car. when he starts up his car his arm could be blown away. I am too tired to write more on how to get rid of this bastard. But these are some of the things I've thought of.

Thank you Dad  
Patry Johnson

Maybe a team could be sent to do the job they would have to be able to deal with people on different levels person of high call, middle call, and the lower call (that's me). The underdog underdog. And I do like

B15-31-a-221

To Jim  
I think that we ought to MAKE UP some CHRISTMAS  
CANDY to sell. AND make sure we would have some  
poisons in the CANDY. AND let myself AND  
others play like we are selling CHRISTMAS CANDY  
door to door & just sell it to him even if  
he doesn't WANT to buy ANY I would MAKE  
SURE he would AT least get A sample.  
AND another one is we could wait UNTIL  
he's NOT AT home & then INSERT A bomb in  
his door where he lets himself in & when he  
does put his key in the key hole the bomb  
would go off & that would be the end of him. L.A.

Dad,  
I think the reason that Chris was  
done in was because the Mertles and  
Stoens were afraid of what he might  
do to them. So they told the people  
they are consorting with to get  
rid of him because they were  
afraid for their lives. I think  
we should scare them by having

Some of our known members to  
look them straight in the eye  
several times a day for a few  
days but to use different  
people for this so they don't  
do to one like they did to  
Chris. I doubt if they are  
sleeping too well right now.  
BB-31-a-224 Barb Cordell

Nad.

12.20.77

I am opposed to paying Jim Stein anything but  
maybe a warning shot in the dark. Maybe we could  
move our people either here or into hiding that are  
Prime targets for a frame up. I am willing to meet  
him any place because what he has done to  
endanger black people which he has no concern  
for, I don't feel he should be allowed to live.

Unless my memory fails me. When did there any  
offer from a man, connected to the Mafia, offering  
his free services a couple of years ago? Maybe we  
should take him up on that offer.

BA-31-a-225

As I said I am willing to kill for this cause  
because without this cause I would be nothing  
anyway and certainly could not live in a  
system filled with people like Jim Stoen  
and all the other traitors.

Thank you Dad.  
Ray Jones

BB-31-a-226

-2550-2-13-81

~~1/2 x 1/2 x 1/2~~  
Dad,  
I would be more than  
glad to be involved in  
any plan to stop  
Tim Stoen or any other  
conspirator. If we  
planned a burglary or  
something similar, their  
assinations it would  
take some of the heat off  
of us and give a warning  
to the other conspirators.  
L L  
Ron Sines<sup>11</sup>  
2-9  
BB-31-a-227

What about putting a good  
sized ad into ~~the~~ a gay  
paper where Tim Stoen is  
residing, welcoming him to  
the gay community. It  
would louse up his reputa-  
tion and scare him. Other-  
wise I think we should ignore  
him and <sup>not</sup> even acknowledge receipt  
of his communications with us.  
BB-31-a-228 Lisa Layti

Dec 20, 1977

Dear Dad.

Jim Stone told you a lie to go back to the state. He was afraid to do what he is doing now because he knew my brother would have killed him. So I got him out of the way because he would blackmail the family

Armed states

BB-31-a-229



Jim I remember Jim Stoen told  
me once about the concession  
stands when time came for the  
new contract, he told me to tell  
the people that I hadnt made up  
my mind I did not want to sign  
it again he said to tell them that  
I had not made up my mind that  
it was no... just tell them to wait  
this would leave me have a hold  
on it. I feel that this is what  
he is trying here just keeping  
~~one~~ one foot in the door. I dont want  
to go back, but if it was to help  
to make peace back there any way  
at any time. I would not  
give him nothing

BB-31-a-230

Cleane

Dad - I feel that Jim Stone is being backed, encouraged or forced  
in his attempt to black mail us by the conspiracy elements; I don't think  
he has the guts <sup>or</sup> a valid reason to do it on his own. I also feel that he  
is bluffing - he really doesn't have anything to use on us that hasn't been  
made public already, for he would have used it by now. I think that his  
asking you for money, and so little money at that, is a means of  
intimidating you, smouldering and under-mining your character,  
and/or making you so angry that you would come back to  
the states. If he is being backed by the conspiracy elements,  
which I'm sure he is, then we know that it's you that  
they're after, and obviously they haven't been able to do  
any physical harm here. Which is their main objective,  
so the only logical explanation in my opinion is to get you  
angry enough to return, I don't think they can do anything  
to us that hasn't been tried already. They're probably at their  
wit's end. I think we should just ignore him and call his  
 bluff. We'll survive no matter what!

Love you, Dad  
Barbara Walker

BB-31-a-231

I, Our Dear Dad  
the only thing that I see about  
this trader he need to be shot.  
or put through hell. after you was  
so nice to all of those that went  
agent the cause and roped you  
for every thing they could think  
of I like to be one of your com-  
rade to give my life because you  
dont need to worry ~~the~~ about them  
just let them face the gun dont  
give them no money. it no use  
because they is like a bird dog you  
give all rest of them to try there  
theme too and he will never stop  
so I believe you will never com-  
promise with no such bull,  
dad I am with you  
all way for a great cause. *Lena Benton*  
31-a-232

DEAR DAD BA-31-a-233

WE SHOULD DO THE SAME  
CLOAK + DAGGER TACTICS  
USED BY CIA - IF  
T. STONE WERE FOUND  
"DECEASED" FROM  
"NATURAL CAUSES - LIKE  
C.I.A GETS RID OF PEOPLE  
WOULD BE BEST FOR OUR  
FAMILY THERE - (OVER)

SHOULD BE VERY  
PROFESSIONAL JOB  
— IF THIS WERE  
DONE A FEW TIMES  
THESE "MOUTHING" OFF  
AGAINST US WOULD  
GET THE MESSAGE  
BA- Love Dm Field  
31-2-234

To Dad.

Cardell Neal

you said in service  
last night (Dec 19,) that if  
any body who would like  
to volunteer in taking care of  
the enemy of the people  
submit your name with  
a plan on how to carry  
out such a act.

My Name, Cardell Neal

Since from the time of  
these article attack.

The press is trying to build  
us up as a mafia.

Instead of what we truly  
are. They let give them  
some of mafia tactic

and miss it with some  
of the weather men,  
underground movement.

Dad call out a list  
of names of companies

who playing along  
in the role of the death  
destruction of People Temple

BAD 31-a-235

and since they are already  
killed off one of our people  
I say the best way to treat  
violence is with violence.

I say one of these companies

should received an exploding

packages no name or anything

and since these companies  
haven't come out and admit  
that they are part of the  
conspirator out open attack

I mean they haven't come  
out in the open, and told  
they were part of the attack

on people simple. The  
best thing for them to do  
is to roll with the punches

or come out and admit  
so them self as part  
of the conspiracy on

people simple. Enemy like  
Jim Stone will see this  
and knowing what happen.  
see this as a threat. and  
no to fear us. since he  
re act to fear let us it.

But then after he back  
off kill him. But if the enemy  
see him back off they may kill  
him any way. I think he want  
back on his feet and not be treated

of earlier suggested harassment, among other things while this was wrong I still feel that my earlier suggestion of being shot in bed with Tim Stoen or kill him and put him into a place with me that would be compromising might as Marie said keep the heat off of us. Also one of the very things that was frightening about Chris was his wildness or anarchy because the enemies wouldn't know whether he might do something on his own. I still feel that the best thing, tho I would be good at the job, I might be so fucked up that I could never be trusted again, would be to have somebody either leave from up there or go back from here as a phony traitor (cruc) 65-31-a-237



a person like myself, or  
some others of known anarchistic  
tendencies who are loyal to  
make their presence known  
either directly or indirectly  
and threaten as an outsider  
perhaps like I could have if  
known that I blamed the  
outsiders for my expulsion and  
am heartbroken, although hostile  
and would do something to  
Tim Stoen, if anything happened  
to P. T. there, go around acting  
crazy yet be very careful  
about everything I say; be  
schizoid, after a set-up of  
being boxed by the church and  
make superficial contact with  
enemys, perhaps a direct threat  
by a non member. I would go  
to jail for killing Stoen and  
take the beef anyway.

BA-31-a-238

Jeff C.

12-20-77

Dad - Blow Carter

I think Tim Stoen  
is taking orders from  
people high up -

I think he is part  
of a plan in the  
conspiracy -

I feel that they  
are doing this so  
soon after Christ's  
death and Mother's  
attempted poisoning  
to fry and weaken  
us -

Stoen and other  
traitors know from your  
example in the past  
that you have never  
given in to those that  
attempt to do harm  
to the people - I  
think they have  
several motives for  
everything they  
do and will not stop  
with a small sum of  
money BA-31-a-239

I agree not to  
give money -

I am willing to do  
whatever necessary to  
stop them - end of it  
they try to stop Mother  
and our comrades and  
the states from coming  
we should move as a  
group to fight for them  
I have no suggestions now  
other than telling them thru  
People's Forum we stand strong  
and with

Dec 19, 1977

Dad,

- if Tim & Grace had there place broken in and  
and they were lapped up and all our people  
were in a meeting and we were no way involv-  
volving our member and we could some  
Dope addice there were some Male Linnig  
in West Oakland that offered to Steal Don Carrol's  
~~Don~~ Son for him that was before the  
Court turn him over to Don, and maybe  
there are some other that is willing to help  
our cause that we have help and maybe  
Russell Jones will come and help us  
take care of the men that got Chris  
and maybe Russell can get ~~you~~ some  
addice to puff up Tim and Grace or maybe a set  
of Ball Brake or there Car or maybe the Car  
Catch on fire just little that that has  
happen to other people that would shake  
him up.

and if he is in a office have Joanne  
Carroll pay him a visit she look some much  
like me have here use another name  
we have here sure turn out to some  
place as if she was me and beat the Hell  
out of him. dad if I have to go back to  
the State I will keep my mouth shut but  
I am not promise you that I will not kill  
the myrtle or the Stone and any other that  
get in the path to get the ~~other~~ other that  
is with them.

I have had 3 month of peace that is  
more than some people have in a life time  
thank you dad there is only one death at that  
is the Hell you are in now. fine out

BB-31-a-241

How many people want to come bring them over  
and get Hell Brake Loose.

there is only six people in my family  
Left in the State, and if you wish I could  
Cook Lunch for them if he come over in January  
to see you

BB-31-a-242

Ruby Carroll

To; Dad

From; Jack Barron

Re; Tim Stoen

I suggest that many of us write to Tim, and on the inside letter itself, We address him as Brother James. Then ask if he also wants his 30 peices of Silver. Unquote!

There might be a lot of loss of face to his CIA supporters, when trying to answer these queries. Who would among them believe his story?

815-31-a-243

socialism, and for my  
brothers & sisters still in  
the states so that they  
can get here to enjoy  
the beauty of a free home  
here in Jonestown.

Bonnie Simon

BB- 31-a-245

Dad,

I don't think we should  
give Tim Stoen any money.  
With him being involved  
in or even knowing about  
the death of our Comrade  
Chris Lewis, the only  
thing we should give him  
is a bullet. He has hurt  
this cause by turning  
traitor and we don't need  
him or the others like him  
around to try and do things  
to hurt us.

Dad, I am so happy that  
I made it here to see &  
live in the beauty of Jonestown.  
A free and socialist home  
with my many brothers & sisters.  
My children are here and I  
know that there is no place on  
earth that they could have a  
better future. With that thought  
I could gladly go back to the  
states or kill a few of our enemies  
and then myself so that the cause  
could not be blamed. I would  
give my life for if you Dad, for

BB-

31-a-234

To DAD.  
FROM: Peter W.  
RE: Tim Stone

In light of the fact that  
Tim asked for a modest amount  
seems to indicate that:

- ① Perhaps he is financially in a poor position
- ② He knows that a large demand would be turned down AUTOMATICALLY but perhaps is gambling that he'll get the money if the amount is modest.
- ③ He wants to leave SAN Francisco and make a new start elsewhere AS he can't get a JOB in SAN FRANCISCO.  
He MAY WANT TO RUN (over→)

31-a-246

fearing reprisal for Chris's death.

- (4.) He may be trying to get a verbal or written response that could strengthen his position in court if he wants to do more dirt.
- (5.) We should not yield to any of his demands.

DAD, I would be willing to return to the U.S. or wherever and kill by ~~subtle~~ subtle (ie: "accidents") or overt means as many traitors as I could get before the authorities would catch me. I would seek to end my own life before the police could apprehend me if it came down to the final showdown.

BB-

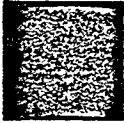
31-247

THANK YOU DAD, Pete W.



I feel that T. Stoen —  
Thinks your right arm has been knocked off (Chris) & he  
doesn't trust the F but wants to see if you will bend. I think  
no matter what a basic fear of you exists. We should think  
of ways to play on his paranoia & make him feel he is going  
crazy. Maybe we could say that some of the people he contacted  
called us because they are our friends.

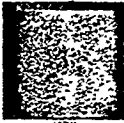
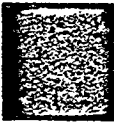
BB-231-a-248



Re: Tim Stoen  
From: Mary  
Warkuspon

I will do ~~anything~~  
necessary to pay these  
traitors back.

BB-31-a-249



Dear Dad: BB-31-a-250 Dec. 19, 1977

I don't know the complications or legalities involving this suggestion but I'm willing to write this to you. My suggestion was to expose him in the last issue of Peoples Forum. I do recollect the flight threat that was photostatically copied in Peoples Forum. It seemed to get a lot of comments from the public. Of course I do realize that our people back there, have to be in a position where they are free from harassment or, possibly kidnapping from those who oppose in the states but nevertheless, let the last

issue of People's Forum be dedicated to  
Tim Lock and his kind. I don't propose any  
threats but expose his blackmail letter.  
Or let it rest!

Suggestion from  
Margaret Leonard

this might stir up rallye in your favor,  
(then again there are possibilities.)

BB-31-a-251

BB-31-a-252

Dad & Comrades:

Count on me either  
in solo or consort  
on the elimination of  
Stoen.

My preference of way  
is by hand gun or a  
rifle - but while about  
it, it would please  
me no end to know  
of the whole conspiracy  
that is if their meeting  
time & place can be  
known for surety.  
Sincerely  
Dutch

19-17-77-31-a-253  
BB

Dad

I think out of this family  
of ex-cons & etc there  
should be at least 1 or 2  
People here that could  
be trusted to go back  
kill him and maybe  
cut him up like this  
and send one  
half to Grace  
and the other half  
to the Myrtle's that  
might also put a stop  
or slow down what  
Grace & the Myrtle  
started on us

1/8 1/8  
Macow  
I would be  
willing to  
go down

08-31-a-254

Dee Dee MACon

~~[REDACTED]~~

even if I had to die  
over there & not make  
it back here. But  
at least this family  
would be safe.  
safe.

Jim —  
Traitors should all be  
killed. I would be willing  
to get in a meeting with  
all or as many of them as  
I could.

I would be willing to  
carry some kind of  
explosive device on my  
body and kill them all.

I would not care if  
I die too, it would be  
worth it.

Diane  
Lundquist

131-31-a-255



~~Hooking cabinets~~  
2 shelves for storage

~~What is expected from him~~

To Dad  
Re: Tim Stoen

BB- 31-a-256

From Mary Winterspoon.  
He went to Ukiah to sue the pseudo  
kind of rapovine - clear his name &  
regain his job in the DA's office  
Could we hit him w/ a  
smear campaign playing up  
the transsexual or unusual  
<sup>aspect of quirks</sup> ~~part~~ of his character (a lot of  
testimonies could be gotten together)  
at least this would destroy  
his reputation or make people wonder  
about him & not trust him.

Give him no money Or make  
it seem as if he is still with us.  
Coming out with shit to find out  
who our enemies are. As long as the  
conspiracy is with him we can only  
work on making them mistrust  
him. Let him know we are still  
around. BO-31-a-257

Dad  
I think tim Stoen is  
not interested in the  
money. He is in such  
a mess and too Chicker-  
to take his own life. And  
he knows you are so  
loving you won't do any  
thing. But he is  
hoping one of us niggers  
~~is~~ <sup>is</sup> crazy enough not to  
listen to you and come  
after him and kill him  
And thus he is out of  
the mess - But I would  
not give him any money.  
But I do think he has  
lived too long -

Mary Ischetter

BB-31-a-258

For Tim Stone.

I would like writing him a Dear John letter  
and on the return envelope coated with heavy  
poison so when he ~~is~~ <sup>gets</sup> it the poison  
would kill him. that is number one.

The next way would be to get him from Stone  
and Grace with all the rest to one ~~place~~  
place and make my self a human bomb & place  
the bomb out of all of them that would be  
worth giving my life for that so my family  
could live in peace

number 3 if that isnt permissible just  
let him come on over in January with  
Grace & take them to the jungle and make  
a disappear with them.  
there are Minnie Mae I could use but I like the  
#2. BR-31-a-259 Nedra Yates

Dad you know you have done so much for  
people you have went out of your way to help  
every one & the more you do the more we love you.

Tom Stone do not desire any money nor  
any consideration from you are any one  
buy the money & send them a Bunch,  
Mills Birmingham

BB-31-a-260

I think if a person went back  
and got in touch with Tim and the  
Mertles and Marvin Swinney and  
led them to believe you left the church  
and you were on their side and had  
some information that they could  
use against P.T. you could probably  
get several of them to meet with you.  
at that time kill every one of them.

I would be willing to do this  
and I would want to be killed or  
myself rather than die arrested, and  
take a chance of saying the wrong  
thing and causing more trouble.

Tom Kice

BB- 31-a - 261

Dear Dad: I say knock Tim Storn off because  
they think they got us over a barrel now that  
Kris Lewis is dead I believe that would let  
them know that we are not to be fouled with.

Nat will do

Nat Swaney

BB- 31-a - 262

POWER OF ATTORNEY

I, the undersigned, am the father of  
John V. Stoen, a minor of the age of 4  
James W. Jones, Maria Katsaris, Joyce  
I hereby name and appoint Touchette, Paula Adams, Jan Wilsey, Debbie  
Touchette, Helen Swinney, and Eva Pugh, jointly and severally,

my attorney(s) in fact with full power and authority to take  
all steps, exercise all powers and rights, that I might do in  
connection with said minor. Without limiting the generality  
of the foregoing, I specifically authorize her/him/them to  
procure any and all medical and hospital/dental care that may  
be necessary or desirable; to apply for passports or other  
travel documents on said minor's behalf; arrange for said  
minor to travel or travel with them out of the country;  
place him in any public or private school that she/he/they  
may deem appropriate; and to do any and all action that  
she/he/they deem(s) appropriate for my said son's  
wellbeing.

Executed on September 30, 1976 at  
San Francisco, California.

Timothy O. Stoen  
Timothy O. Stoen

Subscribed and sworn to  
before me this 30 day  
of September, 1976.

Martha E. Klingman

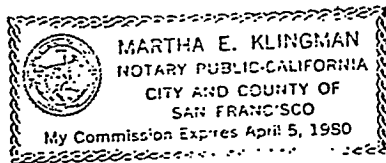


EXHIBIT C-1

BB-31-6-96

To Dad

Dad I feel there should be no money given because he's a part of the conspiracy and was such the money was given on what was a threat that the once things are done to give destruction to the cause of what we represent. Tim Stone should be called out under pressure a person who has more than money. So Dad we can't be reach on being there's a world can be reach on being there's a world. It also feel we will have stand spiritless & weak. So less not give him shift. I would be more than willing to do anything and any task that I was chosen to do. I would be position that I will go back under the false image that I feel.

BB-31-a-263



my parents regarding one pack. And I wonder  
if my parents should have paid more for my  
it is the same as if you were on the task.  
must be able to fly in a plane but it  
could be possible and could be made to stop some of  
to easily. I think it might be  
I thought about the men the military who  
over the camp of Washington And Dad  
to make them enough power at that moment  
because there were every person in prison - also  
but just a 99% can be back the group  
BB-31--264  
Thank Dad  
Bill Oliver

Doc. # 31-a-265

My idea to take care  
of the S. in to:

First have John Dow  
change his name to  
Joe Blow, then send  
him to a native country  
to become a citizen,  
and get a passport.  
then he comes back  
to the States and  
has an accident and  
dies in John Dow.  
then Joe Blow goes  
to the U.S. → over

and take care of  
Tim S. or anyone  
else,  
MARK  
S. R.  
BB-31-a-266

Dear Sir, I agree with the rest of the  
family that we should not give Jim  
Stacy, one penny. I think it should  
be, away of getting him alone and  
having a long talk with him by  
talk. I mean letting him know. If  
he does anything to keep the rest  
of our people from getting here  
are impeding our progress, he is  
a dead man. ~~Whately~~ Chiers is  
on the scene are ~~not~~. He need to  
be made to know that we are not  
going to sit around and twiddle  
our fingers, while he and his no  
good kind try to stop our progress. I  
will be willing to do what ever  
I have to do to any one of them  
are all of them. Thank you.

Yours Truly

BB-31-a-267

Dad

See as Tim Stone was in the DA office  
was the one that is the Cause of  
Chris Death and Tim and Grace should  
be set up to and there are people in  
the state that will do it for (hope) along  
there are kips that will kipe them of  
just to be doing something and there  
are some that cant stand their coats  
as they call them this is what they  
call Tim Stone and he is the best  
to them

BB-31-a-268

BB-31-a-268

Lily Carroll

Dec 19, 1977

Dad

The Sewing Rooms are out of Cloth this week we only turn out about 60 garments this week we are unable to keep sewing other than make curtains for all the cottages and that will be done very soon. The workers are Barbara Cordell, Edith Delaney, Callie Mitchell, Lita Cordell work at night Cut for Barbara.

Dad the Sewing Rooms work well for the most part Edith and Callie just sew and make what I leave for them to work on and they take order very well if it is Barbara if I have order to pass on to her she does not all ways (write them) out as I tell her. 50-31-265

Concerning what to do about Tim Stoen

I see the achilles heel of Stoen is his drunk narcissism and desire to be around anyone who might have power. I remember when we were still in Redwood Valley he was willing to risk his image with you and blab to a reporter because he flattered him. When he met Gene's brother he couldn't be himself but had to throw his medals around - did the same with me - I've hated the motherfucker and would participate in whatever way I could be useful. The natural way for him to go would be at some fancy function and one of Finkle's friends might pass him a poisoned canope.

Phyllis

BB-31-a-270

Tim Stone Situation  
to Dad:

20-12-77

I think that the REASON  
FOR Tim Stone's action to black mail  
the Cause is that ~~he~~ sold out before he  
LEFT Sonos town and ~~now~~ he had to go claim  
what he would have been given by the  
Capitalist, and being that he still was caring for  
Grace more than the Cause he thought that  
if he sold out with ~~the~~ that she would take  
him back. but it didn't work that way and  
he has no money to go anywhere because if  
he stays there too much longer he knows  
that since he killed Teddy Bear he would  
be next so the only thing that he could do  
was to try to black mail us. I feel that  
we should ignore him. because the m.f.  
is already losing his mind or he wouldn't  
have came up with this shit from the gate.  
so without or letters or anything else he  
will get so PARANOID about killing Teddy  
until his own conscious will Fuck him up.  
IF we do any thing to help this action the law  
will try to hold us responsible. so I say  
Fuck him wait it out and be Ready for  
action.

85-  
31-2-271

Thank-Dad

(sawmill  
Diana McKnight)



To Dad

There is a few more things  
I forgot to said I am a tired  
of die in some ways  
BUT be for I see The enemy  
Come in and take our land  
I would go to hell I said to  
myself why is it I am  
working so hard because  
I try to do what was ask of  
me in The states, BUT I am  
beginning to fill better then  
I did I like The field then I  
did Rob is a good person so  
is B McCann, I am sorry to  
said that I had negative  
feeling to you, because if it had  
ben for you I would of ben Brain  
damage to, I don't wouldn't  
to let you down in any way  
at all it tear me to pieces  
to think this way how ben  
with you in The states  
I am not grateful as I sure  
be I must understand  
This is The only way we  
can make it now  
My Grandmom and My Mom  
The only way they would  
have to see if The people  
was being kill in the street  
be they would except this

BB-

31-a-272

i did want to talk  
to my grandmother to let  
her know iam all right  
she was the only one  
who brought me to the  
church, i hate to see  
you go though what happen  
in Peoples rally i thought  
it was over with, i don't  
want to let you down  
at all dad our take  
up the Peoples time  
i will be a work please  
help to be iam grateful  
for you saving me  
for setting my finger  
cut off i want to let you  
know where iam coming  
from

BB- 31-a-273

Dad-Comrade Leader Marlene Wheeler

My suggestion about Tim So concerned the group you mentioned I remembered you saying they offered their help before. I think they should be contacted & should pay a visit to Stoen. He is spineless himself & would know they have no fear of white mail by him so can't be manipulated. They are the only outside people I'd trust in the U.S. If they won't do it, they could give us a lead on a reliable paid assassin. Both sides can play that game & it would be justified that Stoen die by the hands of a capitalist mercenary-type. Our money would be best spent on this then trying to keep his mouth shut. I do think all potential targets, our members, be removed from the situation especially Marcelline. I think they also want to "worry you to death" Grace always played on your heart trouble & is increasing pressure on you. Once we get our people out whatever they print won't probably change to many minds about us those with a Socialist conder

BB-31-a-274

access would still see the conspiracy  
those against us just justify their feelings  
& others are indifferent if our people are killed  
they can't touch us legally & if they come  
in fighting we'll be ready to fight to the  
death. The reason I was thinking of a paid  
assassin is he would hardly be able to  
turn traitor or state evidence, if he had  
other "cases" behind him, he wouldn't  
talk. If they know we'll go to these  
lengths Krad & others might take a second  
thought, it could be a convenient  
accident but they would know. We must  
be direct & decisive with these people  
they have accused us of everything  
under the sun & should be dealt with  
in the ultimate revolutionary manner!

I would be very willing to cooperate  
in any plan to this end. I have often  
been divisive in the group, caused  
problems & been an ass but I believe  
in the revolutionary principle of comrad  
enism & when the shit comes down  
I'm ready to fight. I would be willing  
to return to the states to help bring

CA-31-a-275

To Dad

From: Chin Poyah

In this specific case dealing with Jim Stoern  
There seems to be but two real choices  
open for us. One is to ignore him and  
The other is to teach him a lesson.

To ignore him will do nothing but  
cause him to want to follow through  
with his plans. I think that he has no  
true realization of what we will do. A person  
who has never suffered does not look for  
suffering. Also he does not think that we will  
go very far. On the other hand, he may get worried  
but I do not think that this will stop him.

To teach him a lesson on the other hand  
whether it be killing him or just keeping him  
around a bit ~~and~~ will have a definite effect  
upon the ~~enemy~~ <sup>traitors</sup> as well as him. A  
strange accident will score all the traitors.

To kill him however, I believe is a little bit  
too far if we are to get our people out.  
This is what the enemy want. However, to  
beat the living shit out of him would have  
3 positive points. It would certainly scare  
him enough to want to leave us alone. Fear of  
death ~~is a~~ <sup>is</sup> a person to extreme positions.  
& much more so than money or reputation.  
It would also score the traitors who would  
certainly find out. This is the one who they

BB-31-a-276

were afraid of. We can see them someone else to be afraid of. In addition it will prove to the traitor that we are willing to do some thing.

To have him have a mysterious accident would have the same result also. I would like to see him broke foot on a hill or him have a heart attack or have his gas filled house blow up when he turns on the light or to have his car catch on fire and burn up. None of these would ensure him being hurt but there would be a great possibility.

Personally, I would love to go back to see to it that this happened. I could push him down a flight of stairs that would kill him.

What I think is best is that he has a strange accident one day and when he drops his some body home I don't know shut out of him and destroy his house. This would give him something to think about and would let him know that we could kill him without any chance of it being traced to us.

Cher Reynolds 31-a-277

19 Dec. 1977

To: Jim Jones

From: Laura Johnston

Re: Present Commitment concerning TDS

I know I fuck up in my follow through with different responsibilities - I would love to be able to do one thing - right - without fucking up - If I could be useful driving a car off a cliff - with Tim and any traitors I could take - or if I could carry an explosive into a group of them - without implicating the group - in any way that I could take others with me - I'd be more than willing to do it.

I have fears, preferences, many faults but I think that death offers me things I want so I don't see myself falling short of any instructions in that area.

BB- 31-a-278

They all know about the parody  
and the choir was never up before

the weakest one there. They get the wrong pose.  
Alternatives: 1) Remove all of our  
people immediately.

2) Who is the weakest person in our  
opposition; the one who would tend to  
crack under pressure?

Select that one ~~attack them~~ etc  
then get some of these groups that  
promised to rub people out for us to  
harass this one or undermine them.

3) Garry must be made to know that his  
ass is linked with ours now. He has been  
here and the system wouldn't trust him. So he'd  
better fight like it's his own ass he's saving.

4) Start a rumor that everybody will be rubbed  
out after Jim is gone except Grace, who will get it.

60-31-a-279





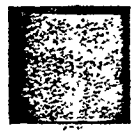
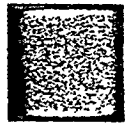
What is the problem?

1) They know we have murdered our top strong arm man. Tried to poison mom. What do they gain from that?

- (A) Sleep easier, (b) walk the streets with <sup>greater ease</sup>
- (B) Demoralize the entire church.
- (C) Pounce on those who crack now.
- (D) Force Jim to return to the States

say he was out of the country at <sup>the time</sup>  
~~the time. Start a rumor that Jim was at our~~  
~~bank ready for our heads as returning~~  
~~prisoners. Start a rumor that~~  
 Chris was seen at a number of places  
 since the supposed death. Have ~~them~~  
 one imitate his voice on the phone and talk to

3/12-280



Dear Dad  
Jim Stone is a sick man he and  
Grace bath, have cause you and  
your family so much heart aches  
even P.T. family. you owe him nothing  
we owe him nothing. Dont give  
him nothing. you have been put  
through to much. from that M.F.  
all he need is a whole in the  
ground. and him and Grace in it.  
Give him nothing.

Thank you Dad

Burges Lee Dean

I am glad I am your child.  
P.S. I dont trust him. dad. <sub>BO</sub>-31-a-281

To: DAD  
From: TERRI BARGEMAN

BB-31-a-282

Dad,

I fill we shouldn't give Tim Stone  
nothing. Because if we did pay him  
off little by little, that would be  
a ideal to raise the amount higher  
and we will never get through  
paying him. So I say no, don't give  
him anything no even a dime. I fill  
if he wants money so bad he have  
to ask us for some he better try  
to see his lady, if anybody wants  
it.

BB-31-a-283  
Terio Bergeman.  
Thank you Dad.

Dad BS-31-a-284

Marlene Wheeler

I thought it was time I wrote & let you know where my head is at & where I want it to be. You have made reference to me at times & I want to explain how I analyze & evaluate that. When I first hear something that sounds like me, I at first almost don't hear it, not wanting to recognize myself. I think what a bitch or that really selfish I wouldn't do that or I'm not like that. The "shoe" doesn't seem to fit. I rationalize that if the offenses are similar, my motives are better or slightly different so it's not so bad as that person. Later still I compare myself with this "person" & see more of myself & the situations become more familiar & cleared. The next step is to evaluate if I can slide by & not face any consequences. This works for about a week. Then I begin to evaluate if I want to take steps to change myself, do I want to change out of fear, intimidation, that me & time is running out, or from guilt & from a socialist consciousness. I battle this out for weeks. Then it's how much do I want to give up, what action would make me feel less guilty & produce more of a Communist consciousness, and what would keep me off the floor. The major fear is a loss of public image which is funny because people see you for what you are anyway. I know though that the best way to change & grow, is to smash the facade of ego so a true Communist consciousness can grow. Then there is no need to "protect" the make-believe Socialists. I know the trouble I have caused you & the family in the past & recently. I do get very selfish & self-centered & have acted out badly. That side of me I even detest. I would rather be honest to you about my feelings. I feel we have always communicated through an indirect medium. I would voice my discontent to others it would get to you & come back to me in placating me. Thisurbed me because it wasn't direct & I became very hostile. You have however given me chances to grow by giving me warnings pretty directly & time to make change. I have a long way to go I realize. My worst fault besides thinking I'm good looking, most of the time is opening my mouth at the wrong time. I know I criticize too much & cause division. It's really counter-revolutionary & I will learn to control this. I would like to offer positive criticism & some

Solutions for more efficiency. Sometimes I question procedures because I am looking for easier, faster ways of doing things. Other times I am frustrated & hostile because time & energy is needlessly wasted. I would like to maintain a discipline of not speaking in the fields about anything but purpose of work & gratitude or singing socialist songs. This is harder than silence for me. Because I must think & evaluate what I say more. I will do this for no less than 3 weeks because it takes that long to break old habits & establish new ones. I will be turning in extra things that I have to the warehouse as soon as I can get things together by Sunday night or Monday morning. I try to give up things in degrees - sort of as the ship is sinking, I lighten the loads. I feel terrible about what I've put you through and I respect you as my leader. I don't want to follow you because of emotional dependence however or because of intimidation. I want to follow you because I see your commitment to a Communist principle. What you have accomplished can't be compared to anyone there. \*is no doubt, I only hope I can help in some small way to build a collective community. Although I believe in only using as much force as necessary to produce change, I will defend our homeland to the death whenever necessary. I have no sympathy for the Capitalist class, I could easily use violence at any moment. I am not a pacifist when it comes to a fight.

JIM

Marlene Wheeler

BB-31-a-285

.....  
justice for Chris' death. If someone <sup>Martine Wheeler (2)</sup>  
could infiltrate their group "turn traitor"  
and learn some of their plans it would be  
ideal but they would be very wary right  
now about that. I would be a likely candidate  
for this because I have been seen as a traitor  
so to speak for years. They wouldn't know I've  
been here & would think I just wanted my  
children back. I don't believe Tim S. needs  
the money as you say it's a small amount,  
he can get money from rich parents or  
practicing law etc, he made it low enough  
to be a possibility but not enough to  
sustain him for long. He wants some  
ego satisfaction to make him feel more  
equal to you if you give in to his demands.  
Also they know these blows one after the  
other can throw you into insulin reaction  
stroke or heart attacks. They know they  
can't reach you physically so they want to  
weaken you through emotional turmoil  
& anxiety for the family. This  
would be a swifter killer than the  
assassins they try to send in, that  
hasn't worked. So they're going at it

01-31-2-286

.....  
this way. They have stepped this up since  
the last physical attempt. We must get  
our people out so we can stop this  
"psychological warfare. Grace + the  
Myrtle's would work this way, Tim is  
too sheepish alone + they would just  
turn over the information if they  
just wanted to get you legally. It is  
much more valuable as a psychologi-  
cal weapon this way. They may  
draw this threat out for a while to get  
the full effect. The one that threatened  
Marceline's life could have been sent  
by them so it looks more like things  
are coming from all directions causing  
even more worry. Someone who doesn't  
seem connected to them would be more  
of a threat than if they said it because  
they can't get directly involved in that  
kind of threat. It is mind warfare  
now + we need to put them on pins +  
needles through an outside organization  
that is known for its intimidation + decisiv-  
ness + will make them nervous.

AP-31-a-287      Marlene Wheeler



To: Dad From: Ron Talley  
Tim Star Suggestion

① Just tell him NO and nothing more about the bribe - this will leave the pressure of decision on him and if we cannot compromise with his fact there is not too much we can do without violence

② He is fixated for a small amount of money which seems like one of his weird quirks or just an arbitrary amount because his aim could be to just cost us time and production on top of what the rest of the conspiracy is doing. They may want to attack us on so many fronts as to divide our forces into so many areas that it will wear us down so they can hit us with something real big at the right time.

③ Only Starin wants straight

at 31-a-588

us he knows his best bet  
is to do it before we all  
get here so I don't think  
it will be long before we  
get more pressure from him  
Almost all educated professions  
are most afraid of physical  
violence and since this is out  
of it Stoen and others will  
push more - We need to show  
we have more like Louis  
among us and he since they  
use them

⑤ The enemies all know I left  
the group at one time and  
don't know I'm back so I  
could go among them to get  
information or enter through  
Mexico as a US citizen and  
kill any of them or all of  
them if circumstances permit  
I could outline the way  
it could be done if you  
feel it is needed.

Po-31-a-289-15-11 Thank You Dad

DAD: SENCE HIS CLEAR TIM STOEN  
AND OTHERS HAD EVERY THING TO DO WITH  
CHRIS BEING KILLED. NOW ASKING FOR MONEY.  
I FEEL HE SHOULD NOT BE ANSWERED IN NO WAY.  
I AM SURE THEY THINK I AM TOO DUMB TO THINK  
ALONG WITH OTHERS LIKE ME. TO SHOW UP AT  
HIS HOUSE AT NIGHT LOOKING FOR ANOTHER PERSON  
~~TO~~ ~~TO~~ ~~TO~~ AND JUST BLOW HIS HEAD OFF  
WOULD BE THE ANSWER THEY ALL WOULD UNDER-  
STAND. TO SAY A WORD IN ANY WAY WOULD CAUSE  
THEM TO BE ON GUARD I AM WILLING TO OFFER  
MYSELF AS A DATE TO GET THIS ANSWERED.  
THE WAY IT SHOULD BE DONE. I FEEL THEY  
THINK THAT THEY HAVE GOTTEN THE ONLY ONE  
OF US THAT WILLING TO STOP THEIR MESS WITH-  
OUT A WORD. I THINK THEY FEEL WE ARE AFRAID  
DUE TO WHAT GRACE KNOW ABOUT TOP BUSINESS  
IN THE FAMILY. AND OUR COMING HERE WHEN  
WE DID AND AT THE RATE. OR BETTER YET  
JUST LET THE PERSON THAT OFFERED HIS  
HELP DO AS HE OFFERED. BECAUSE TO GET  
ONE AND LEAVE THE OTHERS WOULD ONLY PUT  
GAS ON THE FIRE, IN THEIR FAVOR.

THANK YOU DAD

CONSTANCE HARRIS

DAD: SENCE THERE IS A QUESTION  
ABOUT MY WORK HRS. I WILL DROP OFF  
MY TIME EACH MORNING AT THE OFFICE SENCE  
SOME OF MY WORK IS AT NIGHT. I WILL ALSO  
CHECK IN AS USUALY.

THANK YOU DAD.

CONSTANCE HARRIS

BB-31-a-290

from Don Jackson.

Dear Dad,

Now that it has become absolutely clear that our enemies will go to any means to obtain their ends, we must weigh the risk that is run by letting them survive against the risk of destroying them.

Now that one of us has fallen in the battle we should all consider it our only reasonable sacrifice to be willing to lay down our lives when strategy demands.

I have concluded that Jim Jones in his weak, sick, sellout mentality is calling our bluff. We must not allow him to win.

I believe that no choice is left us but to take his life or that of one of the other main conspirators.

I am sure that when one of them is picked off the others will panic.

BB-31-a-291

I do not believe that this can be done until our people are ready to risk their lives to bring it about. In other words those who cannot stand up under such pressure must be evacuated now and brought over here. Those who are able to stand can remain with a plan of escape when the moment dictates.

I don't believe that we can depend upon anyone but ourselves to carry out this plan of attack (the paper it's on should be eaten at once after read)

I believe that some of us from here must go in on this mission with a well laid plan as well as a well laid plan of either escape and or revolutionary suicide as a last end.

I think that all the weapons transportation money and plan of attack or orders should be waiting for him when he hits the United States. I suggest a bomb as the weapon.

BR-31-2-292

The plan should not be revealed until the day it is to occur. And either his escape or suicide should be finalized that same day. The bomb should be put into a capsule or tin can that can be thrown through the window of their car. While it is moving, this will give the person a jump on his get away and in heavy traffic they could also be in an unmarked car moving along beside them. This will allow them to make good their getaway.

They could also move along side the car and fire on them with a high calibre pistol with a silencer in heavy traffic. Possibly nobody will even notice the incident if the cover the pistol with a cloth or something. One of us with a disguise could ride around them all day and they would never know it.

BB-31-c-293

The person executing the plan should move in after the area and moves of the enemy has been well checked out. They should move in quickly strike quickly and be on a plane to a well protected place within the same hour.

If they are caught they should be ready to take arsenic pill and give up the gadget, or some other drug. If the person is caught the evacuation plan should be implemented at once.

Thank you Dad,

Don Jackson

P.S. If the incident goes unseen and there is no witnesses then the person should remain in the city and go under ground. A second car should possibly be in the area to investigate if there are any witnesses.

BB-31-a-294

Dad

This is what I think about  
Stoen. If there is a way that he could  
really be made to suffer before he dies  
this I would prefer. I am ready to go on  
the line anytime.

BB.

31-a-295 Thank You Dad . Joey Clark



Dear dad  
i thank you should forget a  
Bout giving Jim Stone  
any money. if he come here  
we will do him in  
Thank you dad

BB- Callie Mitchell  
31-a-296

Dearest Dad:-

First of all I want to thank you for our lovely candy. I had stop eating candy about 1923 as it made me fat. But this is so nice, I eat it now.

I also would like to get my hands on Tim Stone, for all the grief he has put you thru. Also what happened to our Chris.

Tim does not need no mercy of no kind, he should go live!

Chris, & never know who did it. Please Dad, do not give him one penny, you are the only dad

I had a little <sup>ear</sup> home. Please lift him

BS-31-a-297

learn the hard way.

I hope we can get some garlic soon, so I can get back on job.

I am now making jellies so they can be sold.

I like rice & Etias better than noodles. I am on a salt free diet now to get the swelling in legs, which are better ~~get rid of~~ get me on it, & before I met you, I was on it from 1952 until about 3 years ago. I give up lunch, as you can have things you need. I am losing weight all the time.

Thanks. Glad for everything.

Your child,

BB-

31-c-298 ✓ *Quail E. Fagnery*

Because of my past involvement with the Murders  
girls and the fact that I almost destroyed this  
whole cause and especially the hell I put you through,  
the least I could do would be to give my life for  
this cause. It would be easy to write you that I'd  
be willing to do so dramatic thing to help save the  
cause, but all I'm going to say is if anything  
goes down, please count me in. If there is any-  
thing you need me to do please count me as very  
willing. If I can really be a help I'm ready.

BB-31-a-299

Cynthia Davis  
Thank You Dad.

Jim: I think we should have another person to step in and take on the image of Chris Lewis, possibly Jim Mc Elvane - Let him go with a couple of others and shake up the Mertles and Tim Stoen, Gary Yambrew and others, If they feel secure in the fact that Chris is no longer around they need to know that there are others who aren't afraid. If they do anything to prevent the rest of the people from getting here I think the rest of us should return and make arrangements to meet with all of the traitors possibly at the church and let us all be bombed. First all of their throats could be worked on -

Dorothy Brady

BB- 31-a-300

Dear Dad,

I am really sick of Jim Stone and all the other Traders of this cause. I <sup>really</sup> ~~am~~ agree with you when you say they are all priests. These people should be dealt with.

I remember the story of the assassination of President Kennedy. I could be wrong, or I could have this story mixed up with another story. If I'm not mistaken <sup>all</sup> the witnesses of the incident were killed, but the way they died appeared to be ~~of~~ <sup>due to</sup> health problems or accidents.

I think some died of heart attacks, strokes, cancer, and some died in their sleep. There were so many ways these people were killed. If I'm not mistaken they were injected with these disease.

I wish that I had kept the article so I could express what I'm taking about better. If this plan could be used I suggest all the traders be killed like that

Cheryl White

BB-31-a-301

DECK

what I think about Tim Stone and this so called Blank mile  
I think this hol ordell is a setup they thought this organization  
was based on Chris back boun. Tim Stone thought if he could  
get rid of Chris there is know doubt that Tim is a friend of Chris.  
Some figures heard the CIA to Blank mile use for so little of money  
if we give in to him he will know dont come back for much more  
me I would not give him a God'dam thing he is trying to intimidate  
use they are trying to see how weak we are and if the CIA would  
not let are people go in the states they should be commended a not  
to die for what is only right shit you only live ones. if we gave  
Tim Stone the money am shake the CIA can have it all played to turn  
it around and say we try to Blank mile Tim Stone for so much money  
we can not allow are self to have to pay someone

and a notice way.

Tim Stone I would have him killed to the sense that it would look  
like he commided suicide. when you were taken about how Tim

prekaded up and down the streets like a women people that dress  
up like a women when they get prashed on some people would call  
this person a lonnotiek some lony commed suicide  
and they read these weed letters before they vannish from  
the earth but the reading would be in his on hand reading  
A long letter of his mental state of affairs and then kill him  
know body is to be found. you can say that he killed his self  
because he could not relate to his wife grace stone have Tim  
Stone to read this so the CIA can think that Tim Stone commided  
suicide over his wife then make that will nook of some  
of the prashed of us when the news papper ask grace stone  
about her husben death because he was not the men a not to relate  
to his wife sexually so he commided suicide.

and if Tim Stone dose not read this letter kill him another way  
and berry him were he will never be found

I would do it my self

11/20/77 Billie Victor

I can understand a little bad that you can not extend to trust anyone  
but God'dam I wish I could help with something bad.

BR-31-a-302

FR: D. Blakey  
Re: Jan Brown's poisoning.

Whats interesting about Jan B. getting poisoned is that this is now, the 2<sup>nd</sup> time.

The first time was the night that fat-john Smith came to the SF Temple & the police came to our gate & a "search warrant" or something like that. They came in to look for him, but he had been hidden away.

That night, when Jan B. was taking him to the SF terminal to get him on a plane back to LA she became "high" and started hallucinating. She was really sick for several hours.

We never knew from what she got sick, but I felt &

BA-31-a-303



told Jan at the time that  
I thought it was Lilly.

She is crazy too; & it would  
be conceivable for her to  
slip this shit to people so  
close and not get noticed.

I may be very paranoid,  
but she would be an  
interesting inside link for  
the conspiracy to pull infor-  
mation from.

BB-31-a-304

To: Jim  
FR: Didi B. Lacey  
Re: Stoen confrontation

When Tom and I met Stoen it was underneath the street in the parking lot down at the Court house.

He was exceedingly Cold & Calculating. His appearance was odd, for example his face was tight and make-up looking - had a transparent type glow to it.

His hair had been dyed dark & was longer & thick. It was combed straight back & was ~~really~~ real split looking, as tho it had had a lot of former treatment done on it.

When we approached him he was startled at first & stopped, but when he realized who we were he was mean. He told us to leave him alone →

BB-31-7-305

OVER

BB-31-a-306

and "stop threatening me, I know what I am doing."  
He talked real loud & continued pointing his finger at us & saying "leave me alone."

When we reached the outside of the garage & other people were around, he kept up the loud talk & we pretended not to be a part of it, as a ~~business~~ <sup>business</sup> man ~~was~~ <sup>was</sup> walking with us & ~~was~~ <sup>was</sup> aware of the situation.

After about 2 hrs, Stein reap-  
peared from the court room  
outside in Grace & Haus &  
walked all around town together.

I think his ~~schizophrenic~~ <sup>schizophrenic</sup>  
& very position conscious. I  
think if he gives states evidence  
against us - he'll think his "home free."

BB-31b

Tim Stoen

(Legal)

1 JEFFREY A. HAAS  
2 Attorney at Law  
3 3609 Sacramento Street  
4 San Francisco, CA 94118  
5 (415) 922-6200  
6  
7 MARGARET RYAN  
8 Attorney at Law  
9 294 Page Street  
10 San Francisco, CA 94102  
11 (415) 626-0979  
12 Attorneys for Petitioner

9 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
10 IN THE CITY AND COUNTY OF SAN FRANCISCO

12 In re the marriage of  
13 Petitioner; GRACE LUCY STOEN  
14 and  
15 Respondent: TIMOTHY O. STOEN

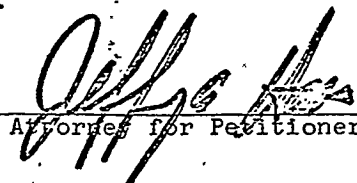
No. 719-147

REQUEST FOR EXCLUSION  
OF PUBLIC

C.C. 4360  
C.C. 4600

18  
19  
20 Petitioner requests the above court to issue an order  
21 prohibiting the public from inspecting all pleadings and other  
22 documents on file herein and for exclusion of the public from all  
23 hearings relating to the custody issue.

25 DATED: 8-11-77

  
Attorney for Petitioner

BB- 31-b-1

DECLARATION OF GRACE L. STOEN

I am the Petitioner in this action and am moving to  
regain physical custody of my 5 year old son, JOHN VICTOR STOEN.

I am aware that the PEOPLE'S TEMPLE has gained considerable publicity and attention as of late. I have been contacted numerous times to make public statements and to supply information. I remain concerned that my son's readjustment to a normal and stable homelife will be adversely affected if litigation regarding his custody gains widespread public attention.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11<sup>th</sup> day of August, 1977 at San Francisco  
California.

KS  
GRACE LUCY STOEN

BB- 31- b-2

Space Below for Use of Court Clerk C

LANSEN & HAAS  
3609 Sacramento Street  
San Francisco, Ca 94118  
922-6200

RECEIVED  
JUL 13 1976  
SUPERIOR COURT

Attorney(s) for Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

CASE NUMBER

Petitioner: GRACE LUCY STOEN  
and

Respondent: TIMOTHY O. STOEN

700-387

PETITION (MARRIAGE)

1. This petition is for:

- Legal separation of the parties pursuant to
  - Civil Code Section 4506(1)
  - Civil Code Section 4506(2)

- Dissolution of the marriage pursuant to:
  - Civil Code Section 4506(1)
  - Civil Code Section 4506(2)

.....has been a resident of this state for at least six months and of this county for at least  
(Petitioner/Respondent)

three months immediately preceding the filing of this petition.

- Nullity of the marriage pursuant to:
  - Civil Code Section 4400
  - Civil Code Section 4401
  - Civil Code Section 4425( )

2. Statistical information:

a. Husband's social security number: unknown Wife's social security number: 563-98-0448

b. Date and place of marriage: 6/27/70, Redwood Valley, Calif.

c. Date of separation: 7/3/76 The number of years from date of marriage to date of separation is: .....years, .....months, .....days.

d. There are one children of this marriage including the following minor children:  
(Number)

Name	Birthdate	Age	Sex
John Victor Stoen	1-25-72	5	Male

3. Property statement:

- There is no property subject to disposition by the court in this proceeding.
- All property otherwise subject to disposition by the court in this proceeding has been disposed of by written agreement of the parties.
- The following described property is subject to disposition by the court in this proceeding:

Residential property  
Respondent's pension & retirement benefits

4. Petitioner requests that the following described property be confirmed as petitioner's separate property:

5. Petitioner requests that:

- a.  Custody of children be awarded: Petitioner  
(Petitioner/Respondent/Other [Specify])
- b.  Support of children be awarded
- c.  Spousal support.....be awarded.....  
(not) Petitioner  
(Petitioner/Respondent)
- d.  Property rights be determined as provided by law
- e.  Attorney's fees and costs.....be awarded.....  
(not) Petitioner  
(Petitioner/Respondent)

and that the court inquire into the status of the marriage and render such judgments and make such injunctive or other orders as are appropriate.

Petitioner declares under penalty of perjury that the foregoing, including any attachments, is true and correct and that this declaration was executed on 2-17-77 at San Francisco, California.

\_\_\_\_\_  
(Attorney for Petitioner)

Grace Lucy Steen (Signature)  
\_\_\_\_\_  
(Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

BB-31-b-4



1 JEFFERY A. PAAS  
Attorney at Law  
2 3609 Sacramento Street  
San Francisco, CA 94118  
3 (415) 922-6200

4 MARGARET RYAN  
Attorney at Law  
5 294 Page Street  
San Francisco, CA 94102  
6 (415) 626-0670

7 Attorneys for Petitioner

8  
9 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
10 IN THE CITY AND COUNTY OF SAN FRANCISCO

11  
12 In re the marriage of ) No. 719-147  
13 Petitioner: GERALD LUCY STORN ) REVISED ORDER RE CHILD CUSTODY  
14 and )  
15 Respondent: TIMOTHY O. STORN )  
16

17 GOOD CAUSE APPEARING:

- 18 1. Petitioner is awarded custody of JOHN VICTOR STORN, age  
19 5, d.o.b. 1/25/72 pending further order of this court.  
20 2. Petitioner's Order to Show Cause Re Custody is continued  
21 for further hearing until *November 18,* 1977, Sept. 13 at 9:00 AM.  
22 3. Good cause appearing, the REV. JIM JONES is ordered  
23 joined as a party to this action pursuant to Section 5159 of the  
24 California Civil Code.  
25 4. Pursuant to Section 5154(1)(d) of the California Civil  
26 Code, the court directs that service of this order, the summons  
27 and petition upon Claimant JONES shall be deemed to have been  
28 effected upon proof of the doing of the following acts: (1) the

1 mailing of a copy of this order, the summons and petition first  
2 class postage prepaid, to the REVEREND JIM JONES, c/o PEOPLE'S  
3 TEMPLE, 1851 Geary Street, San Francisco, California. Said  
4 mailing shall occur no later than September 1, 1977; (2) the  
5 mailing of this order, the summons and petition airmail postage  
6 to REV. JIM JONES, c/o THE PEOPLE'S TEMPLE AGRICULTURAL MISSION,  
7 Guyana. Said mailing shall occur no later than September 1, 1977;  
8 (3) the mailing of a copy of this order to CHARLES GARRY, Attorney  
9 at Law, 1256 Market Street, San Francisco, California. Said  
10 mailing shall occur no later than September 1, 1977; and (4) pub-  
11 lication of this order in the Recorder, a newspaper of general  
12 circulation for 4 times in 4 successive weeks as provided in  
13 Government Code 6064. The last day of publication shall be no  
14 later than *November 11*, 1977. In the alternative, REV.  
15 JONES may be personally served.

16 5. Pursuant to Section 5160(2) of the California Civil Code,  
17 Claimant Rev. JIM JONES is ordered to appear before this court  
18 on *November 18*, 1977 Room 481, City Hall, to show  
19 cause why Petitioner should not be awarded custody to said minor.

20 6. Pursuant to Section 5160(2) of the California Civil Code,  
21 Claimant REV. JIM JONES is advised that a failure to appear at  
22 the time and place designated above may result in a decision ad-  
23 verse to himself.

24 7. Any previous declaration or statement signed by either  
25 Petitioner or Respondent authorizing Claimant JONES to act as  
26 guardian of said minor child is hereby declared null and void.

27 8. The parties and their agents are restrained from removing  
28 said minor from the City and County of San Francisco pending

1 further order of this court.

2 DATED: October 14, 1977

As/ DONALD B. KING  
JUDGE OF THE SUPERIOR COURT

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Bb-31-b-7

Name, Address and Telephone No. of Attorney(s)

Space Below for Use of Court Clerk Only

JEFFREY A. HAAS  
Hanson & Haas  
3609 Sacramento  
San Francisco, CA 94118  
(415) 722-6200

ATTORNEY FOR: Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF .....

(If not, put in the full street address of court or branch court)

In re the marriage of

Petitioner: GRACE LUCY STORN

and

Respondent: TIMOTHY O. STORN

CASE NUMBER

712-147

SUMMONS (MARRIAGE)

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

**AVISO!** Usted ha sido demandado. El tribunal puede decidir contra Ud. sin audiencia a menos que Ud. responda dentro de 30 días. Lea la información que sigue.

1. To the Respondent (See footnote\*):

- a. The petitioner has filed a petition concerning your marriage. You may file a written response within 30 days of the date that this summons is served on you.
- b. If you fail to file a written response within such time, your default may be entered and the court may enter a judgment containing injunctive or other orders concerning division of property, spousal support, child custody, child support, attorney's fees, costs, and such other relief as may be granted by the court, which could result in the garnishment of wages, taking of money or property, or other relief.
- c. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be filed on time.

Dated .....

Clerk

(SEAL)

By \_\_\_\_\_

Deputy

BB-31-b-8

\* The response and other permitted papers must be in writing and in the form prescribed by the California Rules of Court. They must be filed in this court with the proper filing fee and proof of service of a copy of each on petitioner. The time when a summons is deemed served on a party may vary depending on the method of service. For example, see CCF 413.10 through 415.40

3. Property statement:

- There is no property subject to disposition by the court in this proceeding.
- All property otherwise subject to disposition by the court in this proceeding has been disposed of by written agreement of the parties.
- The following described property is subject to disposition by the court in this proceeding.

Residential property  
Respondent's pension & retirement benefits

4. Petitioner requests that the following described property be confirmed as petitioner's separate property:

5. Petitioner requests that:

- a.  Custody of children be awarded: \_\_\_\_\_  
(Petitioner/Respondent/Other (Specify))
- b.  Support of children be awarded \_\_\_\_\_
- c.  Spousal support \_\_\_\_\_ be awarded \_\_\_\_\_  
(not) (Petitioner/Respondent)
- d.  Property rights be determined as provided by law \_\_\_\_\_  
Petitioner
- e.  Attorney's fees and costs \_\_\_\_\_ be awarded \_\_\_\_\_  
(not) (Petitioner/Respondent)

and that the court inquire into the status of the marriage and render such judgments and make such injunctive or other orders as are appropriate.

Petitioner declares under penalty of perjury that the foregoing, including any attachments, is true and correct and that this declaration was executed on 2/17/79 at San Francisco, California.

\_\_\_\_\_  
(Attorney for Petitioner) Grace Lucy Stoen (Signature)  
\_\_\_\_\_  
(Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

BB-31-b-9

Name, Address and Telephone Number of Attorney(s)

HANSEN & HAAS  
3009 Sacramento Street  
San Francisco, Ca 94118  
922-6200

Space Below for Use of Court Clerk Only

FILED  
FEB 21 1977  
CARL H. GLENN, Clerk  
JUDICIAL CENTER

Attorney(s) for Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

Petitioner: GRACE LUCY STOEN  
and

Respondent: TIMOTHY O. STOEN

CASE NUMBER

PETITION (MARRIAGE)

1. This petition is for:

- Legal separation of the parties pursuant to:
  - Civil Code Section 4506(1)
  - Civil Code Section 4506(2)
- Dissolution of the marriage pursuant to:
  - Civil Code Section 4506(1)
  - Civil Code Section 4506(2)

has been a resident of this state for at least six months and of this county for at least three months immediately preceding the filing of this petition.

- Nullity of the marriage pursuant to:
  - Civil Code Section 4400
  - Civil Code Section 4401
  - Civil Code Section 4425

2. Statistical information

a. Husband's social security number: [redacted] Wife's social security number: 563-02-0448

b. Date and place of marriage: 6/27/70, Redwood Valley, Calif.

c. Date of separation: 7/3/76. The number of years from date of marriage to date of separation is: [redacted] years, [redacted] months, [redacted] days.

d. There are one children of this marriage including the following minor children:

Name	Birthdate	Age	Sex
John Victor Stoen	1-25-72	5	Male

Form Adopted by Rule 1251 of Judicial Council of California Revised Effective January 1, 1972

PETITION (MARRIAGE)

BB-31-6-10

California Newspaper Service Bureau, Inc. Established 1924

1 JEFFREY A. HAAS  
2 Attorney at Law  
3 3609 Sacramento Street  
4 San Francisco, CA 94118  
5 (415) 922-6200

6 MARGARET RYAN  
7 Attorney at Law  
8 294 Page Street  
9 San Francisco, CA 94102  
10 (415) 626-0979

11 Attorneys for Petitioner

12 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
13 IN THE CITY AND COUNTY OF SAN FRANCISCO

14 In re the marriage of ) No. 719-147  
15 )  
16 Petitioner: GRACE LUCY STOFN ) REVISED ORDER RE CHILD CUSTODY  
17 )  
18 and )  
19 Respondent: TIMOTHY O. STOEN )

20 GOOD CAUSE APPEARING:

- 21 1. Petitioner is awarded custody of JOHN VICTOR STOEN, age  
22 5, d.o.b. 1/25/72 pending further order of this court.  
23 2. Petitioner's Order to Show Cause Re Custody is continued  
24 for further hearing until *November 18,* 1977, Dept. 13 at 9:00 AM.  
25 3. Good cause appearing, the REV. JIM JONES is ordered  
26 joined as a party to this action pursuant to Section 5159 of the  
27 California Civil Code.  
28 4. Pursuant to Section 5154(1)(d) of the California Civil  
Code, the court directs that service of this order, the summons  
and petition upon Claimant JONES shall be deemed to have been  
effected upon proof of the doing of the following acts: (1) the

1 mailing of a copy of this order, the summons and petition first  
2 class postage prepaid, to the REVEREND JIM JONES, c/o PEOPLE'S  
3 TEMPLE, 1851 Geary Street, San Francisco, California. Said  
4 mailing shall occur no later than September 1, 1977; (2) the  
5 mailing of this order, the summons and petition airmail postage  
6 to REV. JIM JONES, c/o THE PEOPLE'S TEMPLE AGRICULTURAL MISSION,  
7 Guyana. Said mailing shall occur no later than September 1, 1977;  
8 (3) the mailing of a copy of this order to CHARLES GARRY, Attorney  
9 at Law, 1256 Market Street, San Francisco, California. Said  
10 mailing shall occur no later than September 1, 1977; and (4) pub-  
11 lication of this order in the Recorder, a newspaper of general  
12 circulation for 4 times in 4 successive weeks as provided in  
13 Government Code 6064. The last day of publication shall be no  
14 later than *November 11*, 1977. In the alternative, REV.  
15 JONES may be personally served.

16 5. Pursuant to Section 5160(2) of the California Civil Code,  
17 Claimant Rev. JIM JONES is ordered to appear before this court  
18 on *November 18*, 1977 Room 481, City Hall, to show  
19 cause why Petitioner should not be awarded custody to said minor.

20 6. Pursuant to Section 5160(2) of the California Civil Code,  
21 Claimant REV. JIM JONES is advised that a failure to appear at  
22 the time and place designated above may result in a decision ad-  
23 verse to himself.

24 7. Any previous declaration or statement signed by either  
25 Petitioner or Respondent authorizing Claimant JONES to act as  
26 guardian of said minor child is hereby declared null and void.

27 8. The parties and their agents are restrained from removing  
28 said minor from the City and County of San Francisco pending



1 further order of this court.

2 DATED: October 14, 1977

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4

/s/ DONALD B. KING  
JUDGE OF THE SUPERIOR COURT

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MARGARET RYAN  
ATTORNEY AT LAW  
234 PAGE STREET  
SAN FRANCISCO, CA 94102  
(415) 625-0979

-3- BB- 31-b-13

**Revised Order Re Child Custody.**

**SUPERIOR COURT FOR THE STATE of California in the City and County of San Francisco.**

**In re the Marriage of Petitioner: GRACE LUCY STOEN and Respondent: TIMOTHY O. STOEN—No. 719-147.**

**Good cause appearing:**

**1. Petitioner is awarded custody of JOHN VICTOR STOEN, age 5, date of birth January 25, 1972, pending further order of this court.**

**2. Petitioner's Order to Show Cause Re Custody is continued for further hearing until November 18th, 1977, Dept. 13 at 9:00 a.m.**

**3. Good cause appearing, the REV. JIM JONES is ordered joined as a party to this action pursuant to Section 5159 of the California Civil Code.**

**4. Pursuant to Section 5154(1)(d) of the California Civil Code, the court directs that service of this order, the summons and petition upon claimant JONES shall be deemed to have been effected upon proof of the doing of the following acts: (1) the mailing of a copy of this order, the summons and petition first class postage prepaid, to the REV. KENNED JIM JONES, c/o PEOPLE'S TEMPLE, 1851 Geary Street, San Francisco, California. Said mailing shall occur no later than September 1, 1977; (2) the mailing of this order, the summons and petition airmail postage to REV. JIM JONES, c/o THE PEOPLE'S TEMPLE AGRICULTURAL MISSION, Guyana. Said mailing shall occur no later than September 1, 1977; (3) the mailing of a copy of this order to CHARLES GARRY, Attorney at Law, 1258 Market Street, San Francisco, California. Said mailing shall occur no later than September 1, 1977; and (4) publication of this order in the Recorder, a newspaper of general circulation for 4 times in four successive weeks as provided in Government Code 6064. The last day of publication shall be no later than November 11th, 1977. In the alternative, REV. JONES may be personally served.**

**5. Pursuant to Section 5160(2) of the California Civil Code, Claimant REV. JIM JONES is ordered to appear before this court on November 18th, 1977, Room 481, City Hall, to show cause why petitioner should not be awarded custody to said minor.**

**6. Pursuant to Section 5160(2) of the California Civil Code, Claimant REV. JIM JONES is advised that a failure to appear at the time and place designated above may result in a decision adverse to himself.**

**7. Any previous declaration or statement signed by either petitioner or respondent authorizing claimant JONES to act as guardian of said minor child is hereby declared null and void.**

**8. The parties and their agents are restrained from removing said minor from the City and County of San Francisco pending further order of this court.**

**Dated: October 14, 1977.**

**DONALD E. KING,**

**Judge of the Superior Court.**

**Endorsed: Filed Oct. 14, 1977, CARL M. OLSEN, Clerk. By: SUE WALKER, Deputy Clerk.**

**JEFFREY A. HAAS, 3609 Sacramento Street, San Francisco, California 94118; MARGARET RYAN, 294 Page Street, San Francisco, California 94102, Attorneys for Petitioner.**

**Oct 18-4t-Tu-R**

**No. 45652**

Name, Address and Telephone No. of Attorney(s)

Space Below for Use of Court Clerk Only

JENNIFER A. HAAS  
Hansen & Haas  
3609 Sacramento  
San Francisco, CA 94118  
(415) 322-6200

ATTORNEY FOR: Petitioner

SUPERIOR COURT OF CALIFORNIA, COUNTY OF . . . . .

In re the marriage of

Petitioner: GRACE LUCY STORNI

and

Respondent: TIMOTHY O. STORNI

CASE NUMBER

712-147

SUMMONS (MARRIAGE)

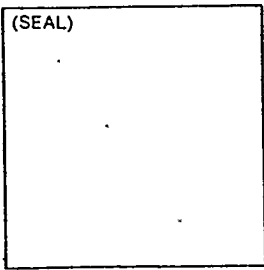
NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

AVISO! Usted ha sido demandado. El tribunal puede decidir contra Ud. sin audiencia a menos que Ud. responda dentro de 30 días. Lea la información que sigue.

1. To the Respondent (See footnote\*):

- a. The petitioner has filed a petition concerning your marriage. You may file a written response within 30 days of the date that this summons is served on you.
- b. If you fail to file a written response within such time, your default may be entered and the court may enter a judgment containing injunctive or other orders concerning division of property, spousal support, child custody, child support, attorney's fees, costs, and such other relief as may be granted by the court, which could result in the garnishment of wages, taking of money or property, or other relief.
- c. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be filed on time.

Dated: . . . . . Clerk



By \_\_\_\_\_, Deputy

\* The response and other permitted papers must be in writing and in the form prescribed by the California Rules of Court. They must be filed in this court with the proper filing fee and proof of service of a copy of each on petitioner. The time when a summons is deemed served on a party may vary depending on the method of service. For example, see CCP 413.10 through 413.40.

BB-31-b-14

FILED

JUN 7 1978

John J. Corcoran, County Clerk

M Medaris  
BY M. MEDARIS, DEPUTY

1 TIMOTHY OLIVER STOEN  
120 Montgomery Street, Suite 1700  
2 San Francisco, California 94104  
3 Telephone: (415) 391-5020  
4 Attorney for Plaintiffs

5  
6  
7

CEC  
A

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE COUNTY OF LOS ANGELES

10 WADE B. MEDLOCK and MABEL M.  
MEDLOCK, husband and wife,

11 Plaintiffs,

12 vs.

13 JAMES WARREN JONES, also known  
14 as JIM JONES; PEOPLES TEMPLE  
OF THE DISCIPLES OF CHRIST, a  
15 nonprofit corporation; ENOLA M.  
NELSON; ENOLA M. NELSON REALTY;  
16 HUGH FORTSYN; JAMES McELVANE;  
and FIRST DOE through FIFTIETH  
17 DOE, inclusive,

18 Defendants.

No. 243292

COMPLAINT FOR COMPENSATORY  
AND PUNITIVE DAMAGES FOR  
CONVERSION BASED ON COERCION  
AND FOR INTENTIONAL INFLIC-  
TION OF EMOTIONAL DISTRESS

19  
20 Plaintiffs allege:

21 FIRST CAUSE OF ACTION

22 1. Plaintiffs are informed and believe and thereon allege that  
23 defendant JAMES McELVANE is, and at all times herein mentioned was,  
24 a resident of the County of Los Angeles, State of California.

25 2. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST ("PEOPLES  
26 TEMPLE") is, and at all times herein mentioned was, a nonprofit cor-

BB-31-b-15

1 poration organized and existing under and by virtue of the laws of  
2 the State of California. PEOPLES TEMPLE at all times herein mention-  
3 ed represented itself as a church.

4 3. Plaintiffs are informed and believe and thereon allege that  
5 defendant ENOLA M. NELSON is, and at all times herein mentioned was,  
6 a real estate broker licensed by the State of California and doing  
7 business as defendant ENOLA M. NELSON REALTY. at 5760 Rodeo Road, Los  
8 Angeles, California.

9 4. Plaintiffs are informed and believe and thereon allege that  
10 defendant JAMES McELVANE is, and at all times herein mentioned was,  
11 a real estate salesman licensed by the State of California and doing  
12 business as a salesman for defendants ENOLA M. NELSON and ENOLA M.  
13 NELSON REALTY.

14 5. Plaintiffs are informed and believe and thereon allege that  
15 defendant JAMES WARREN JONES ("JONES"), also known as JIM JONES,  
16 was at all relevant times herein mentioned the president of defendant  
17 PEOPLES TEMPLE.

18 6. Plaintiffs WADE B. MEDLOCK and MABEL M. MEDLOCK are, and at  
19 all times herein mentioned were, husband and wife and residents of  
20 the County of Los Angeles, State of California.

21 7. Plaintiffs are ignorant of the true names and capacities of  
22 defendants sued herein as FIRST DOE through FIFTIETH DOE, inclusive,  
23 and therefore sue these defendants by such fictitious names. Plain-  
24 tiffs will amend this complaint to allege their true names and capa-  
25 cities when ascertained. Plaintiffs are informed and believe and  
26 thereon allege that each of the fictitiously named defendants is re-

1 sponsible in some manner for the occurrences herein alleged, and that  
2 plaintiffs' damages as herein alleged were proximately caused by  
3 their conduct.

4 8. Defendants JONES, PEOPLES TEMPLE, ENOLA M. NELSON ("NELSON"),  
5 ENOLA M. NELSON REALTY ("NELSON REALTY"), HUGH FORTSYN ("FORTSYN"),  
6 JAMES McELVANE ("McELVANE"), and FIRST DOE through FIFTIETH DOE, in-  
7 clusive, were the agents and employees of their codefendants JONES,  
8 PEOPLES TEMPLE, NELSON, NELSON REALTY, FORTSYN, McELVANE, and FIRST  
9 DOE through FIFTIETH DOE, inclusive, and in doing the things herein-  
10 after alleged were acting within the course and scope of such agency  
11 and the permission and consent of their codefendants.

12 9. Plaintiffs are informed and believe and thereon allege that  
13 on or about February 1, 1977, in the County of Los Angeles, State of  
14 California, defendants, and each of them, knowingly and wilfully con-  
15 spired and agreed among themselves to unlawfully extort, convert,  
16 and misappropriate from plaintiffs, by fraud and deceit and by threats  
17 of death and bodily harm, the net proceeds from the forced sale of  
18 plaintiffs' real property in the County of Los Angeles, State of Cal-  
19 ifornia, which said defendants knew to have a fair market value of ap-  
20 proximately \$190,000.00 and an equity value to plaintiffs of approxi-  
21 mately \$130,000.00.

22 10. On February 1, 1977 plaintiffs were the owners of two par-  
23 cels of real property, herein referred to respectively as the BALDWIN  
24 HILLS PROPERTY and the SECOND AVENUE PROPERTY, in the County of Los  
25 Angeles, State of California, described as follows:

26 a. BALDWIN HILLS PROPERTY: a three-bedroom house at 4644

1 Don Zarembo Drive, Los Angeles, California, having a fair market  
2 value on that date of approximately \$125,000.00 and outstanding en-  
3 cumbrances of approximately \$40,000.00, thereby constituting an equity  
4 value in plaintiffs of approximately \$85,000.00.

5 b. SECOND AVENUE PROPERTY: a triplex and five-room house at  
6 3891 and 3891 3/4 2nd Avenue, Los Angeles, California, having a fair  
7 market value on that date of approximately \$65,000.00 and outstanding  
8 encumbrances of approximately \$20,000.00, thereby constituting an  
9 equity value in plaintiffs of approximately \$45,000.00.

10 11. Plaintiffs became members of defendant PEOPLES TEMPLE in  
11 1971, whose minister and president was defendant JONES. In 1975 de-  
12 fendant JONES began to pressure plaintiffs to sell all they had, give  
13 all proceeds from such sales to defendant PEOPLES TEMPLE, and "go  
14 communal". Plaintiffs resisted this pressure, whereupon defendant  
15 JONES gradually increased it. Defendant JONES employed various stra-  
16 tagems to induce plaintiffs to sell the above-described properties,  
17 one approach being that the money was needed to develop the Peoples  
18 Temple Agricultural Mission in Guyana, South America, which was then  
19 being established by defendant JONES.

20 12. Plaintiff WADE B. MEDLOCK is 71 years of age, and plaintiff  
21 MABEL M. MEDLOCK is 67 years of age. Plaintiffs worked together in  
22 their own maintenance business for 33 years to acquire their equity  
23 in the above-described properties as security for their senior years.  
24 Neither plaintiff at any time wished to sell either parcel of pro-  
25 perty or to donate either parcel to anyone, including defendant JONES  
26 and defendant PEOPLES TEMPLE. Plaintiffs were living in the BALDWIN

1 HILLS PROPERTY as their residence at all relevant times until on or  
2 about August 1, 1977. Plaintiffs had no appreciable assets beyond  
3 the aforesaid properties.

4 13. On or about February 13, 1977 in the County of Los Angeles,  
5 State of California, defendant JONES personally called plaintiffs  
6 into the "council room" of the PEOPLES TEMPLE church building at  
7 1366 Alvarado Boulevard, Los Angeles. Present with defendant JONES  
8 at said time and place were at least seven other members of defendant  
9 PEOPLES TEMPLE, including defendants FORTSYN, NELSON, and McELVANE,  
10 all acting as agents for defendant JONES. Defendant JONES at said  
11 time and place presented to plaintiffs certain documents previously  
12 filled out by defendants NELSON, NELSON REALTY, and McELVANE author-  
13 izing the sale of the BALDWIN HILLS PROPERTY and the SECOND AVENUE  
14 PROPERTY. The sales prices were listed substantially lower than the  
15 fair market values in order to expedite immediate sales. When plain-  
16 tiffs hesitated, defendant JONES personally order them to sign the  
17 documents by stating to plaintiffs the following threat:

18                   You will either sign these papers or  
19                   you will die. We are not taking your  
                    property but just protecting it.

20 14. Plaintiffs interpreted the aforesaid statement by defendant  
21 JONES as a threat they would be killed if they did not sign the docu-  
22 ments presented by him. Plaintiffs were not permitted to read the  
23 documents nor to ask questions concerning them. Any and all apparent  
24 consents of each plaintiff to the aforesaid authorizations were ob-  
25 tained by defendants solely through duress and menace of unlawful and  
26 violent injury to the person of each plaintiff.



1        15. At the time of signing the aforesaid documents each plaintiff  
2 was mindful of having heard defendant JONES say with respect to an  
3 individual who had given property to defendant PEOPLES TEMPLE and  
4 then reneged and then died, "I killed him."

5        16. Plaintiffs are informed and believe and thereon allege that  
6 defendant JONES ordered the other defendants to act as his agents in  
7 coercing their signatures on all other documents which would be re-  
8 quired to be signed in escrow in order to result in the proceeds of  
9 the sales of the above-described parcels being taken by defendant  
10 PEOPLES TEMPLE. All apparent consents by plaintiffs to all such other  
11 documents were obtained by defendants solely through reminders of  
12 the aforesaid threat of defendant JONES and solely through said duress  
13 and menace of unlawful and violent injury to the person of each plain-  
14 tiff.

15        17. On May 13, 1977, in the County of Los Angeles, State of Cal-  
16 ifornia, defendants reminded plaintiffs of the aforesaid threat of  
17 defendant JONES and ordered them to sign a document relating to the  
18 escrow of the sale of the BALDWIN HILLS PROPERTY (Escrow Number 1183-  
19 PW) entitled "Escrow Amendment/Supplement" to Escrow Instructions.  
20 A copy of Page 1 of the Disclosure/Settlement Statement for the afore-  
21 said sale is attached as "Exhibit A (Baldwin Hills)" and made a part  
22 hereof. A copy of the aforesaid Escrow Amendment/Supplement is at-  
23 tached as "Exhibit B (Baldwin Hills)" and made a part hereof. The  
24 aforesaid Amendment/Supplement was addressed to Crestwood Escrow Ser-  
25 vice in Inglewood, California, and reads as follows:

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From sellers net proceeds at close of escrow, escrow holder is authorized and instructed to make one-half of net proceeds payable to PEOPLES TEMPLE and one-half payable to MABEL M. MEDLOCK.

The apparent consent of plaintiffs, and each of them, to the aforesaid document was obtained by defendants solely through duress and menace of unlawful and violent injury to the person of each plaintiff.

18. Plaintiffs are informed and believe and thereon allege that defendant JONES, upon learning that plaintiff MABEL M. MEDLOCK had attempted to withhold from defendant PEOPLES TEMPLE her one-half of the proceeds from the sale of the BALDWIN HILLS PROPERTY, was furious and ordered the other defendants to intensify the reminders of the threats constituting duress and menace as above alleged. On May 17, 1977, in the County of Los Angeles, State of California, defendants reminded plaintiff MABEL M. MEDLOCK of the aforesaid threats, and ordered her to sign a document relating to the escrow of the BALDWIN HILLS PROPERTY sale in the form of a letter addressed to Crestwood Escrow Service, a copy of which is attached hereto as "Exhibit C (Baldwin Hills)" and made a part hereof. Said letter reads as follows:

You have heretofore been handed an instruction by me dated May 13, 1977, providing that certain funds be paid to me at the close of Escrow. I now CANCEL THAT INSTRUCTION.

Instead, please pay all funds due to me from this Escrow to PEOPLES TEMPLE of the Disciples of Christ, a California Corporation.

BB-31-6-21

1 The apparent consent and authorization of plaintiff MABEL M. MEDLOCK  
2 to the aforesaid letter was obtained by defendants solely through  
3 said duress and menace of unlawful and violent injury to the person  
4 of each plaintiff.

5 19. On May 13, 1977, in the County of Los Angeles, State of Cal-  
6 ifornia, defendants reminded plaintiffs of the aforesaid threat of  
7 defendant JONES and ordered them to sign a document relating to the  
8 escrow of the sale of the SECOND AVENUE PROPERTY (Escrow Number 1074-  
9 PW) entitled "Escrow Amendment/Supplement" to Escrow Instructions.  
10 A copy of Page 1 of the Settlement Statement for the aforesaid sale  
11 is attached as "Exhibit D (Second Avenue)" and made a part hereof.  
12 The aforesaid Amendment/Supplement was addressed to Crestwood Escrow  
13 Service in Inglewood, California, and reads as follows:

14 From sellers net proceeds at close of  
15 escrow, escrow holder is authorized and  
16 instructed to make one-half of net pro-  
ceeds payable to PEOPLES TEMPLE and one-  
half payable to MABEL M. MEDLOCK.

17 The apparent consent of plaintiffs, and each of them, to the afore-  
18 said document was obtained by defendants solely through said duress  
19 and menace of unlawful and violent injury to the person of each  
20 plaintiff.

21 20. Plaintiffs are informed and believe and thereon allege that  
22 defendant JONES, upon learning that plaintiff MABEL M. MEDLOCK had  
23 attempted to withhold from defendant PEOPLES TEMPLE her one-half of  
24 the proceeds from the sale of the SECOND AVENUE PROPERTY, was furious  
25 and ordered the other defendants to intensify the reminders of the  
26 threats constituting duress and menace as above alleged. On May 17,

1 1977, in the County of Los Angeles, State of California, defendants  
2 reminded plaintiff MABEL M. MEDLOCK of the aforesaid threats, and or-  
3 dered her to sign a document relating to the escrow of the SECOND  
4 AVENUE PROPERTY sale in the form of a letter addressed to Crestwood  
5 Escrow Service, a copy of which is attached hereto as "Exhibit E -  
6 (Second Avenue)" and made a part hereof. Said letter reads as fol-  
7 lows:

8                   You have heretofore been handed an in-  
9                   struction by me dated May 13, 1977,  
10                   providing that certain funds be paid  
11                   to me at the close of Escrow. I now  
12                   CANCEL THAT INSTRUCTION.

13                   Instead, please pay all funds due to  
14                   me from this Escrow to PEOPLES TEMPLE  
15                   of the Disciples of Christ, a Califor-  
16                   nia Corporation.

17 The apparent consent and authorization of plaintiff MABEL M. MEDLOCK  
18 to the aforesaid letter was obtained by defendants solely through  
19 duress and menace of unlawful and violent injury to the person of  
20 each plaintiff.

21           21. On or about July 28, 1977, defendants ordered plaintiffs to  
22 vacate their BALDWIN HILLS PROPERTY residence because escrow was  
23 about to close. Plaintiffs stated to defendants that they would not  
24 have sufficient monies to maintain themselves and requested the sum  
25 of \$10,000.00 from the net proceeds being claimed by defendant PEO-  
26 PLES TEMPLE, but defendants stated to plaintiffs that \$10,000.00 "is  
too much" and agreed that plaintiffs should receive the sum of  
\$7,000.00 instead.

22. The sales of both the BALDWIN HILLS PROPERTY and the SECOND

1 AVENUE PROPERTY were finalized in escrow on or about August 1, 1977,  
2 in the County of Los Angeles, State of California, at which time the  
3 following net proceeds were paid over to defendant PEOPLES TEMPLE:

4 a. Net proceeds from sale of BALDWIN HILLS PROPERTY:

5 \$37,003.08; and

6 b. Net proceeds from sale of SECOND AVENUE PROPERTY:

7 \$11,506.99.

8 23. Plaintiffs are informed and believe and thereon allege that  
9 in addition to the above-enumerated net proceeds totalling \$48,510.07  
10 paid over to defendant PEOPLES TEMPLE, that defendants NELSON and  
11 NELSON REALTY were ordered under duress by defendant JONES to pay,  
12 and in fact did pay, over to defendant PEOPLES TEMPLE the sum of  
13 \$5,217.00, which represented their real estate sales commission of  
14 \$2,535.00 from the sale of the BALDWIN HILLS PROPERTY and \$2,682.00  
15 from the sale of the SECOND AVENUE PROPERTY.

16 24. At all times herein mentioned, and in particular on or about  
17 July 31, 1977, plaintiffs were, and still are, the owners and were,  
18 and still are, entitled to the possession of the following personal  
19 property: Monies constituting the net proceeds from the sales of the  
20 above-described properties paid over to defendant PEOPLES TEMPLE.

21 25. On or about July 31, 1977, the above-mentioned personal pro-  
22 perty had a value of \$48,510.07, and on that date was in the posses-  
23 sion of plaintiffs at Los Angeles, County of Los Angeles, State of  
24 California.

25 26. On or about August 1, 1977, in the County of Los Angeles,  
26 State of California, defendants converted the aforesaid personal pro-

1 perty to their own use, as a proximate result of which plaintiffs  
2 lost the value of their entire equity in the above-described proper-  
3 ties (less the above-mentioned payment of \$7,000.00), all to plain-  
4 tiffs' damage in the sum of ONE HUNDRED TWENTY-THREE THOUSAND DOLLARS  
5 (\$123,000.00).

6 27. At the time of the conversion, defendants were fully aware  
7 that the property was the property of plaintiffs and that plaintiffs  
8 were entitled to possession thereto, and notwithstanding that know-  
9 ledge, defendants wrongfully, maliciously, and with intent to injure  
10 plaintiffs, converted it as hereinabove alleged. By reason thereof,  
11 plaintiffs are entitled to exemplary and punitive damages in the sum  
12 of TWELVE MILLION DOLLARS (\$12,000,000.00).

13  
14 SECOND CAUSE OF ACTION

15 28. Plaintiffs reincorporate the allegations of their First  
16 Cause of Action as though fully set forth at length herein.

17 29. Plaintiffs are informed and believe and thereon allege that  
18 on or about June 16, 1977, in the City and County of San Francisco,  
19 State of California, defendants, and each of them excepting defendants  
20 NELSON and NELSON REALTY, knowingly and wilfully conspired and agreed  
21 among themselves to intentionally inflict emotional distress and  
22 mental suffering on plaintiffs should they refuse to follow defendant  
23 JONES to "Jonestown", Guyana, South America, and thereby become un-  
24 able effectively to protest and complain to legal authorities about the  
25 above-alleged unlawful extortion and conversion. Said infliction of  
26 emotional distress and mental suffering was to be done by threats of

1 death and bodily injury made by persons in the County of Los Angeles,  
2 State of California, who would be selected by, and who would act  
3 upon the express orders of, defendant JONES in Guyana, South America.  
4 Defendant JONES would transmit such orders in pre-arranged code by  
5 courier and by international shortwave amateur radio.

6 30. On or about January 20, 1978, in the County of Los Angeles,  
7 State of California, defendant FORTSYN telephoned plaintiffs and made  
8 the following threat twice, once to each plaintiff:

9 You know what happened to Chris.  
10 Jim wants you to come to Guyana.

11 31. At the time of defendant FORTSYN making the above-mentioned  
12 threat, the defendants, and each of them, knew that plaintiffs would  
13 regard, as they did in fact regard, the name "Chris" as a reference  
14 to Christopher Lewis, a member of defendant PEOPLES TEMPLE and body-  
15 guard of defendant JONES known publicly to have been murdered on the  
16 streets of San Francisco, California in December 1977 shortly after  
17 returning from Guyana, South America. At said time the defendants,  
18 and each of them, also knew that plaintiffs would regard, as they in  
19 fact did regard, the name "Jim" as a reference to defendant JONES.

20 32. Plaintiffs are informed and believe and thereon allege that  
21 defendant JONES on or about January 14, 1978, personally ordered, by  
22 means of courier and amateur shortwave radio, the making of the afore-  
23 said threat, and by the same means dictated its wording, using a pre-  
24 arranged code. Plaintiffs are informed and believe and thereon allege  
25 that defendant JONES knew and intended that his order would be thus  
26 received and acted upon in the County of Los Angeles, State of Cali-

1 fornia so as to result in the making of the aforesaid threat and the  
2 consequent injury to plaintiffs.

3 33. Defendants did the acts and things herein alleged pursuant  
4 to, and in furtherance of, the conspiracy and agreement above alleged.

5 34. Upon being threatened by FORTSYN as above alleged, plaintiffs  
6 became fearful that they would be murdered by defendants. As the  
7 proximate result of the aforementioned threat, plaintiffs suffered  
8 humiliation, mental anguish, and emotional and physical distress,  
9 and have been injured in mind and body, all to plaintiffs' damages  
10 in the sum of SIX HUNDRED THOUSAND DOLLARS (\$600,000.00) each.

11 35. As a further proximate result of the aforementioned threat,  
12 plaintiffs are informed and believe and thereon allege they will be  
13 required to employ physicians and surgeons to examine, treat, and  
14 care for them, and may incur medical expenses for hospital bills in  
15 an amount which has not yet been ascertained.

16 36. The aforementioned acts of defendants were willful, wanton,  
17 malicious, and oppressive, and justify the awarding of exemplary and  
18 punitive damages in the amount of TWO MILLION DOLLARS (\$2,000,000.00).

19  
20 THIRD CAUSE OF ACTION

21 37. Plaintiffs reincorporate the allegations of their First and  
22 Second Causes of Action as though fully set forth at length herein.

23 38. On or about March 26, 1978, in the County of Los Angeles,  
24 State of California, defendant McELVANE approached plaintiff WADE B.  
25 MEDLOCK. Plaintiff WADE B. MEDLOCK said to McELVANE:

26 I don't believe in Jim anymore.



1 Defendant McELVANE at said time and place then made the following  
2 threat to plaintiff WADE B. MEDLOCK in the presence of plaintiff  
3 MABEL M. MEDLOCK:

4                   You better watch out. What happened  
5                   to Chris could happen to you.

6           39. At the time of defendant McELVANE making the above-mentioned  
7 threat, the defendants, and each of them, knew that plaintiffs would  
8 regard, as they did in fact regard, the name "Chris" as a reference  
9 to Christopher Lewis as above alleged.

10           40. Plaintiffs are informed and believe and thereon allege that  
11 defendant JONES on or about March 19, 1978, personally ordered, by  
12 means of courier and amateur shortwave radio, the making of the afore-  
13 said threat, which was to be rendered by defendant McELVANE after  
14 he approached plaintiff WADE B. MEDLOCK and ascertained that said  
15 plaintiff's attitude was one likely to cause trouble for defendants  
16 JONES and PEOPLES TEMPLE. Plaintiffs are informed and believe and  
17 thereon allege that defendant JONES knew and intended that his order  
18 would be thus executed by defendant McELVANE in the County of Los  
19 Angeles, State of California so as to result in the making of the  
20 aforesaid threat and the consequent injury to plaintiffs.

21           41. Defendants did the acts and things herein alleged pursuant  
22 to, and in furtherance of, the conspiracy and agreement alleged in  
23 paragraph 29 herein.

24           42. Upon being threatened by defendant McELVANE as above alleged,  
25 plaintiffs became even more fearful that they would be murdered by  
26 defendants. As the proximate result of the aforementioned threat,

1 plaintiffs suffered humiliation, mental anguish, and emotional and  
2 physical distress, and have been injured in mind and body, all to  
3 plaintiffs' damages in the sum of SIX HUNDRED THOUSAND DOLLARS  
4 (\$600,000.00) each.

5 43. As a further proximate result of the aforementioned threat,  
6 plaintiffs are informed and believe and thereon allege they will be  
7 required to employ physicians and surgeons to examine, treat, and  
8 care for them, and may incur medical expenses for hospital bills in  
9 an amount which has not yet been ascertained.

10 44. The aforementioned acts of defendants were willful, wanton,  
11 malicious, and oppressive, and justify the awarding of exemplary and  
12 punitive damages in the amount of TWO MILLION DOLLARS (\$2,000,000.00).

13

14 WHEREFORE, plaintiffs pray judgment as follows:

- 15 1. For general damages in the sum of \$2,523,000.00.  
16 2. For medical and related expenses according to proof.  
17 3. For punitive damages in the sum of \$16,000,000.00.  
18 4. For costs of suit herein incurred.  
19 5. For such further and other relief as the court may deem  
20 proper.

21 DATED: June 6, 1978.

22

23

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26

*Timothy Oliver Stoen*

TIMOTHY OLIVER STOEN  
Attorney for Plaintiffs

1 Trial by jury is demanded on all issues.

2 DATED: June 6, 1978.

3

4

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*Timothy Oliver Stoen*

6

TIMOTHY OLIVER STOEN  
Attorney for Plaintiffs

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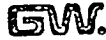
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GREAT WESTERN SAVINGS AND LOAN ASSOCIATION

Form Approved OMB No. 61-11501

A. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT		B. TYPE OF LOAN:	
DISCLOSURE/SETTLEMENT STATEMENT		1. <input type="checkbox"/> FHA	2. <input type="checkbox"/> FMHA
		3. <input type="checkbox"/> CONV. UNINS.	4. <input type="checkbox"/> VA
		5. <input type="checkbox"/> CONV. INS.	6. FILE NUMBER
		7. LOAN NUMBER	4-337401-2
		8. MORTG. INS. CASE NO.	
If the Truth-in-Lending Act applies to this transaction, a Truth-in-Lending statement is attached as page 3 of this form			
C. NOTE: This form is furnished to you prior to settlement to give you information about your settlement costs, and again after settlement to show the actual costs you have paid. The present copy of the form is:			
<input type="checkbox"/> ALTERNATE DISCLOSURE OF COSTS. Some items are estimated, and are marked "(e)." Some amounts may change if the settlement is held on a date other than the date estimated below. The preparer of this form is not responsible for errors or omissions in amounts furnished by others. Meritations of taxes and assessments are based on assumption that such items are not delinquent.			
<input type="checkbox"/> STATEMENT OF ACTUAL COSTS. Amounts paid to and by the settlement agent are shown. Items marked "(p.a.c.*)" were paid outside the closing; they are shown here for informational purposes and are not included in totals.			
D. NAME OF BORROWER EDY, L. H. HILL 3444 E. WINDY DR. LOS ANGELES, CA. 90008		E. SELLER WADE B. MEDLOCK 4431 CRENSHAW BL. LOS ANGELES, CA. 90043	
F. PROPERTY LOCATION 3444 E. WINDY DR. LOS ANGELES, CA. 90008		G. LENDER GREAT WESTERN SAVINGS AND LOAN ASSOCIATION	
H. SETTLEMENT AGENT CRESTWOOD ESCROW SERV. 401 E. MANCHESTER BL. INGLEWOOD, CA. 91301		I. DATES LOAN COMMITMENT: 5/15/77 ADV. DISCLOSURE: 7/8/77	
J. SUMMARY OF BORROWER'S TRANSACTION		K. SUMMARY OF SELLER'S TRANSACTION	
100 GROSS AMOUNT DUE FROM BORROWER		400 GROSS AMOUNT DUE TO SELLER	
101 Contract sales price 84,500.00		401 Contract sales price 114,500.00	
102 Personal property		402 Personal property	
103 Settlement charges to borrower (from line 1400, Section L) 1,609.51		403	
104		404	
105 Adjustments for items paid by seller in advance		Adjustments for items paid by seller in advance	
106 City/town taxes to		405 City/town taxes to	
107 County taxes to		406 County taxes to	
108 Assessments to		407 Assessments to	
109 to		408 to	
110 to		409 to	
111 to		410 to	
112 to		411 to	
120 GROSS AMOUNT DUE FROM BORROWER 86,109.51		420 GROSS AMOUNT DUE TO SELLER 84,500.00	
200 AMOUNTS PAID BY OR IN BEHALF OF BORROWER		NOTE: The following 500 and 600 series sections are not required to be completed when this form is used for advance disclosure of settlement costs prior to settlement.	
201 Deposit or earnest money 14,317.50		500 REDUCTIONS IN AMOUNT DUE TO SELLER	
202 Principal amount of new loan(s) 71,825.00		501 Payoff of first mortgage loan 29,271.39	
203 Existing loan(s) taken subject to		502 Payoff of second mortgage loan 6,123.24	
204		503 Settlement charges to seller (from line 1400, Section L)	
205		504 Existing loan(s) taken subject to	
Credits to borrower for items unpaid by seller		505 2nd Trust Pwd 4,225.00	
206 City/town taxes to		506 L. A. County Tax Collector 1,767.59	
207 County taxes 7/1/77 to 7/8/77 32.03		507 Reliable Mortgage 140.72	
208 Assessments to		508	
209 to		509	
210 to		510	
211 to		511	
212 to		512	
TOTAL AMOUNTS PAID BY OR IN BEHALF OF BORROWER 86,194.53		513	
300 CASH AT SETTLEMENT REQUIRED FROM OR PAYABLE TO BORROWER		514	
301 Gross amount due from borrower (from line 120) 86,109.51		515	
302 Less amounts paid by or in behalf of borrower (from line 200) 86,194.53		520 TOTAL REDUCTIONS IN AMOUNT DUE TO SELLER 47,496.92	
303 CASH <input type="checkbox"/> REQUIRED FROM OR <input checked="" type="checkbox"/> PAYABLE TO BORROWER 85.02		600 CASH TO SELLER FROM SETTLEMENT	
		601 Gross amount due to seller (from line 420) 84,500.00	
		602 Less total reductions in amount due to seller (from line 620) 47,496.92	
		603 CASH TO SELLER FROM SETTLEMENT 37,003.08	

401 EAST MANCHESTER BLVD., SUITE 207  
INGLEWOOD, CALIFORNIA 90301  
678-3233

## ESCROW AMENDMENT/SUPPLEMENT


Form No. 1183-PW Escrow Officer Pat Worrill Date May 13, 1977

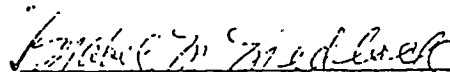
To: **CRESTWOOD ESCROW SERVICE:**

My previous instructions in the above-numbered escrow are hereby modified — supplemented in the following  
matters only

From sellers net proceeds at close of escrow, escrow holder is  
authorized and instructed to make one-half of net proceeds  
payable to PEOPLES TEMPLE and one-half payable to MABEL M. MEDLOCK.  
All other terms and conditions are to remain the same.

END OF INSTRUCTION .....

  
Wade B. Medlock

  
Mabel M. Medlock

*Pat Worrill*  
*Escrow Officer*

RETURN TO ESCROW

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Each of the above signed states he has read the foregoing instructions and understands and agrees to them

EXHIBIT B (BALDWIN HILLS)

BB-31-b-32

To: CRESTWOOD ESCROW SERVICE  
401 East Manchester Boulevard, Suite 209  
Inglewood, California 90301

Re: Escrow No. 1183-PW  
Escrow Officer: Pat Worrill

Gentlemen: ✓

You have heretofore been handed an instruction by me dated May 13, 1977, providing that certain funds be paid to me at the close of Escrow. I now CANCEL THAT INSTRUCTION. #

Instead, please pay all funds due to me from this Escrow to PEOPLES TEMPLE of the Disciples of Christ, a California Corporation.

Dated: at Los Angeles, this 17th day of May, 1977.

END OF INSTRUCTION.....

Mabel M. Mculock  
Mabel M. Mculock

Receipt is hereby acknowledged  
of a copy of this document.

Mabel M. Mculock

EXHIBIT C-(BALDWIN HILLS)

BB- 31-6-33

<b>A. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b>  <b>SETTLEMENT STATEMENT</b>		<b>B. TYPE OF LOAN</b> 1. <input type="checkbox"/> FHA    2. <input type="checkbox"/> FHA    3. <input type="checkbox"/> CONV UNINS 4. <input type="checkbox"/> VA    5. <input type="checkbox"/> CONV INS		
		6. FILE NUMBER	7. LOAN NUMBER	
<b>C. NOTE:</b> This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked "(p.o.c.)" were paid outside the closing, they are shown here for informational purposes and are not included in the totals.				
<b>D. NAME OF BORROWER(S)</b>  Freeman, Larry D. & Brenda Beverly		<b>E. NAME OF SELLER</b>  Medlock Wade B & Mabel M.		<b>F. NAME OF LENDER</b>  Western Mortgage Corp. 18406 Hawthorne Blvd. Ste. 203 Torrance, Calif. 90504
<b>G. PROPERTY LOCATION</b>  3891, 3891 3/4 2nd Ave. Los Angeles, California		<b>H. SETTLEMENT AGENT</b>  Crestwood Escrow Service PLACE OF SETTLEMENT 401 E. Manchester Blvd., Ste. 209 Inglewood, California 90301		<b>I. SETTLEMENT DATE</b>  8/1/77

J. SUMMARY OF BORROWER'S TRANSACTION	
<b>100 GROSS AMOUNT DUE FROM BORROWER</b>	
101. Contract sales price	44,700.00
102. Personal property	
103. Settlement charges to borrower (line 1400)	1,230.64
104.	
105.	
<i>Adjustments for items paid by seller in advance</i>	
106. City/town taxes to	
107. County taxes to	
108. Assessments to	
109.	
110.	
111.	
112.	
<b>110 GROSS AMOUNT DUE FROM BORROWER</b>	<b>45,930.64</b>
<b>200 AMOUNTS PAID BY OR IN BEHALF OF BORROWER</b>	
201. Deposit of earnest money	1,325.00
202. Principal amount of new loan(s)	44,700.00
203. Existing loan(s) taken subject to	
204.	
205.	
206.	
207.	
208.	
209.	
<i>Adjustments for items unpaid by seller</i>	
210. City/town taxes to	
211. County taxes 7-1-77 to 8-1-77	89.41
212. Assessments to	
213.	
214.	
215.	
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219.	
<b>220 TOTAL PAID BY/FOR BORROWER</b>	<b>46,114.41</b>
<b>300 CASH AT SETTLEMENT FROM/TO BORROWER</b>	
301. Gross amount due from borrower (line 110)	45,930.64
302. Less amounts paid by/for borrower (line 220)	(46,114.41)
<b>303. CASH ( ) FROM ( ) TO BORROWER</b>	<b>183.77</b>

K. SUMMARY OF SELLER'S TRANSACTION	
<b>400 GROSS AMOUNT DUE TO SELLER</b>	
401. Contract sales price	44,700.00
402. Personal property	
403.	
404.	
405.	
<i>Adjustments for items paid by seller in advance</i>	
406. City/town taxes to	
407. County taxes to	
408. Assessments to	
409.	
410.	
411.	
412.	
<b>420 GROSS AMOUNT DUE TO SELLER</b>	<b>44,700.00</b>
<b>500 REDUCTIONS IN AMOUNT DUE TO SELLER</b>	
501. Excess deposit (see instructions)	
502. Settlement charges to seller (line 1400)	5,714.25
503. Existing loan(s) taken subject to	
504. Payoff of first mortgage loan	115,352.35
505. Payoff of second mortgage loan	5,037.00
506. Peoples Temple	11,506.99
507.	
508.	
509.	
<i>Adjustments for items unpaid by seller</i>	
510. City/town taxes to	
511. County taxes 7-1-77 to 8-1-77	89.41
512. Assessments to	
513.	
514.	
515.	
516.	
517.	
518.	
519.	
<b>520 TOTAL REDUCTION AMOUNT DUE SELLER</b>	<b>37,700.00</b>
<b>600 CASH AT SETTLEMENT TO/FROM SELLER</b>	
601. Gross amount due to seller (line 420)	44,700.00
602. Less reductions in amount due seller (line 520)	(37,700.00)
<b>603. CASH ( ) TO ( ) FROM SELLER</b>	<b>7,000.00</b>

EXHIBIT D (SECOND AVENUE)

BB-31-6-34

To: Crestwood Escrow Service  
401 East Manchester Boulevard, Suite 209,  
Inglewood, California 90301

Re: Escrow No. 1074-PW  
Escrow Officer Pat Worrill

Gentlemen:

You have heretofore been handed an instruction by me dated May 13, 1977, providing that certain funds be paid to me at the close of Escrow. I now CANCEL THAT INSTRUCTION.

Instead, please pay all funds due to me from this Escrow to PEOPLES TEMPLE of the Disciples of Christ, a California Corporation.

Dated: at Los Angeles, this 17th day of May, 1977.

END OF INSTRUCTION.....

*Mabel M. Medlock*  
Mabel M. Medlock

Receipt is hereby acknowledged  
of a copy of this document.

*Mabel M. Medlock*



SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

WADE B. MEDLOCK et al <p align="center">Plaintiffs</p> v. JAMES WARREN JONES et al <p align="center">Defendants.</p>	CASE NUMBER   CERTIFICATE OF ASSIGNMENT
---	--

A civil action or proceeding presented for filing in a district other than the Central District must be accompanied by this certificate. An action for personal injury, wrongful death or damage to property presented for filing in the Central District must be accompanied by this certificate. If the ground is the residence of a party, name and residence shall be stated.

The undersigned declares that the above entitled matter is filed for proceedings in the Central District of the Superior Court under Rule 2, Section 3 of this court for the checked reason:

	<u>Nature of Action</u>	<u>Ground</u>
<input type="checkbox"/>	1 Adoption	Petitioner resides within the district
<input type="checkbox"/>	2 Conservator	Petitioner or conservatee resides within the district
<input type="checkbox"/>	3 Contract	Performance in the district is expressly provided for
<input type="checkbox"/>	4 Equity	The cause of action arose within the district
<input type="checkbox"/>	5 Eminent Domain	The property is located within the district
<input type="checkbox"/>	6 Family Law	Plaintiff, defendant, petitioner or respondent resides within the district
<input type="checkbox"/>	7 Forcible Entry	The property is located within the district
<input type="checkbox"/>	8 Guardianship	Petitioner or ward resides within the district
<input type="checkbox"/>	9 Habeas Corpus	No action pending, the person is held within the district
<input type="checkbox"/>	10 Mandate*	The defendant functions wholly within the district
<input type="checkbox"/>	11 Name Change	The petitioner resides within the district
<input type="checkbox"/>	12 Personal Property	The property is located within the district
<input type="checkbox"/>	13 Probate	Decedent resided or petitioner resides within the district
<input type="checkbox"/>	14 Prohibition*	The defendant functions wholly within the district
<input type="checkbox"/>	15 Review*	The defendant functions wholly within the district
<input type="checkbox"/>	16 Small Claims Appeal	The lower court is located within the district
<input type="checkbox"/>	17 Title to Real Property	The property is located within the district
<input checked="" type="checkbox"/>	18 TORT	The cause of action arose within the district
<input type="checkbox"/>	19 TORT*	The cause of action arose outside of this county
<input type="checkbox"/>	20 Transferred Action	The lower court is located within the district
<input type="checkbox"/>	21 Unlawful Detainer	The property is located within the district

The residence of the petitioner, respondent, deceased, conservatee, ward, plaintiff, or defendant  
 ..... is  
 (Name)

I declare under penalty of perjury that the foregoing is true and correct and this declaration was executed on  
June 7, 1978 at Los Angeles, California.

Timothy Oliver Atoen  
 (Signature of Attorney)

\*Prerogative writs concerning a court of inferior jurisdiction and Tort Actions arising outside of the county may be filed in Central District only.

BB-31-b-36

PARENTAL CONSENT  
AND POWER OF ATTORNEY

STATE OF CALIFORNIA )  
COUNTY OF Mendocino ) ss.  
UNITED STATES OF AMERICA)

I, Grace L. Stoen and Timothy Stoen hereby declare:

1. I am the natural parent ~~/XXXXXX/~~  
of John Stoen, a minor, born April 27, 1974.
2. I hereby consent to said minor going to Guyana, South America, to live  
and be cared for there under the Guardianaship or custody of Joyce Touchette.

I hereby appoint Sharon Cobb of Redwood Valley, Calif.  
and Jim Jones of S. F., Calif.  
and Helen Swinney of Redwood Valley, Calif.  
as my attorneys-in-fact, jointly and severally, to take any and all action  
any of them deem fit for the welfare of said minor. By this power of attor-  
ney, I give each of the aforesaid attorneys-in-fact the right to the care,  
custody, supervision, and control of said minor anywhere throughout the world,  
and to travel anywhere with said minor throughout the world.

Executed on this 9th day of March,  
1976, at Ukiah, California

SIGNED

Grace L. Stoen  
Timothy Stoen

Wkr \_\_\_\_\_

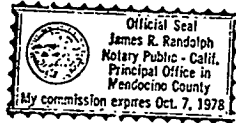
6

BB- 31-6-37

STATE OF CALIFORNIA )  
COUNTY OF ) ss.  
UNITED STATES OF AMERICA)

On March 9th before me, the Undersigned,  
A Notary Public in and for said County and State, personally appeared  
Grace L. Stoen and Timothy Stoen known to me to be the  
person whose names are subscribed to the within instruments and acknow-  
ledged to me that they executed the same.

WITNESS MY HAND AND OFFICIAL SEAL.



*James R. Randolph*

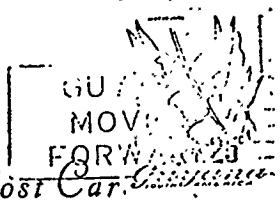
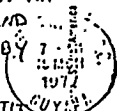
31-6-38

DEAR, GENE,  
I'M REALLY ENJOYING GUYANA. THE  
PEOPLE ARE SO CONSIDERATE AND  
HELPFUL. AM VERY IMPRESSED BY  
THE GOVERNMENT LEADERS.

MY SON, JOHN VICTOR, IS WITH  
HIS WIFE AND DOING GREAT. HE CAN  
READ, HAS DEVELOPED HIS MOTOR  
COORDINATION TREMENDOUSLY, AND  
IS LEARNING ALL KINDS OF INTERESTING  
THINGS ABOUT NATURE. TOM  
GRUBBS AND HIS OTHER TEACHERS  
ARE GIFTED THEORETICALLY AND  
PRACTICALLY. HE IS RECEIVING LOTS  
OF LOVE AND AFFECTION, AND IS  
HAPPY AS A LARK.

HAVE BEEN ATTENDING TO VARIOUS  
LEGAL MATTERS. GUYANA WHICH I  
WILL BE CELEBRATING INDEPENDENCE ARCHON SOON.  
STREET ADDRESS  
DT 21222C @ 1971 D.P.

REGARDS TO ALL. SINCERELY, *Timothy Allen*



Post Car.

EUGENE CHAIKIN, ESQUIRE

P.O. Box 15023

SAN FRANCISCO, CALIFORNIA

94115

U.S.A.

AIR MAIL



BB- 31-6-39

TO CAROLYN LAYTON

Law Office Report #54 November 4, 1978 page 1 from June

1. P.T. v. Stoen lawsuit:

- a. Without consulting any of us, Charles filed <sup>in October</sup> a notice of deposition for examination of Stoen's bank records. We knew nothing of this until Nov. 1, when Hallinan filed a responsive motion for protective order against such deposition. See copies attached. At that time Charles filed a responsive declaration in support of his motion for deposition. Hallinan attached as exhibits to TOS's supporting declaration copies of excerpts from letter sent to media accusing Stoen of things, and copy of letter sent to Franchise Tax Board accusing TOS of working against P.T. Charles blew up when he saw the exhibits and said here was another example of how we do things without his authorization. Well, this deposition business was done without our authorization. Charles told Jean that this was done in consultation with Mazor, and that Mazor had the account number of a Swiss bank account and told Charles he didn't know whose it was, and Charles said if it wasn't Stoen then it must be ours. He said this to Mazor. This whole operation was done by Charles in conjunction with Mazor, not with us.

If you read TOS's declaration, you will see his usual pattern of sticking in irrelevant stuff in order to attach outrageous exhibits, and this time he focuses on letter campaigns. The letter to the Franchise Tax Board is a form letter which would have been used by someone to re-write, and his publicizing it informs us that someone has given it to him. However, the issue of the deposition concerns bank accounts and has nothing to do with letter-writing.

The hearing on the deposition is this coming Tuesday, November 7. Charles will not be there. He will be in Santa Rosa on another case. Tom called him in an effort to change his mind and get him to appear for us, but Charles became angry and explained that this was a strategy of his because Pesonen is on intimate terms with the judge, that he meets with him in his chambers a lot of cases, and Charles does not have a good relationship with the judge involved. He was angry at our telling him what to do. Same old story.

2. Medlock v. P.T.:

The hearing on the motion for change of venue lost, and the judge ruled against us. So Charles and a new attorney in his office, Neil Rosenbaum, who is not a California attorney, but is licensed through the N.Y. + Pa. bars and did the research and writing of the pleadings, filed a Petition for Writ of Mandate. See attached. I talked with Rosenbaum a little because I had to come in and sign a verification. He is young, English accent, careless enough that he forgot to add the verification til after Charles had taken the papers to LA to file them so the verification had to be sent in late. He was in a rush and I didn't get to talk to him much, but he's part-time and will only be there for a month, after which he will be working for a judge.

BB-31-6-40

TO CAROLYN LAYTON

Law Office Report #54 November 5, 1978 page 2 from June

3. Apostolic Corp. - The past decision up to now has been to let the corporation lapse, don't formally dissolve it. Attached is copy of the latest we've received from Franchise Tax Board. In the past we were told to ask Bentzman about this, and when we did, he asked the usual questions about where are the records, did you file a return, and why didn't you. We already know the answer; no return was filed; the penalties are greater for not filing than for filing and not paying. The records are not here of course. So any help Bentzman can give is extremely limited and I would rather not pursue it with him anyway. As these forms come in, are we to continue to ignore them as if they didn't exist? What will eventually happen in re to "enforcement action"?

Another thing with Apostolic: we've received the attached checks from time to time, and when I sent a questin over about them some time ago, I got a note back from Maria saying "a letter needs to be written asking that these checks be reissued in the name of the president of the corporation because it has been dissolved, and include corp. resolution." Well, I asked about this when I went overseas, and Sarah and Chaikin didn't have any final answer on it mainly becaus the corporation is not dissolved and the minutes of the corporation were back here and we didn't know who the current officers were who would sign such a letter. I have looked up in theminutes the current status of the corp and officers and this is it: Terry Carter, is president; Annie Moore is secretary; and Mike Prokes is Vice President. There is no treasurer. The corporation made an official resolution discontinuing corporate operations as of January 31, 1977. Nothing further was done to dissolve the corporation. Going through the file I found the attached Dissolution form which was sent by Janet Evans of the Stark firm, which you may wish to re-examine should there be a change of heart.

4. Truth Enterprises, Inc. - on law office report #53, section III, under "Tax Things for Tish, Item 1" I described a problem we're having with the Board of Equalization because of the error in Harold's having posted SF Bart tax onto the use tax permit quarterly reports. Tish sent a radio message back saying phone the person in charge of that Board, say account is closed, that records were sent to Tish and she will correspond with them there, no longer operative, and do nothing without consultation." May I remind you folks that the letter sent to the Board explaining that the SF Bart tax inclusion is a bookkeeper's error, was not done without consultation; rather it was done via radio instructions received July 16, 1978, and further that I discussed this whole thing with Tish when I went overseas and she said nothing about any change in direction. Bonnie informs us this weekend that the Board called the Ranch Friday and asked about the SF Bart tax inclusion, and Bonnie told them that the bookkeeper was in San Francisco and the business itself wasn't. The telephone call will be made and the latest info re bookkeeper Tish, etc will be conveyed, but we are dubious what will happen after that. Meanwhile, we're still waiting for instructions on how to dissolve Truth as a corporation - were

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promised instructions via the radio last July but have heard nothing further, and no one had anything to give me when I went overseas.

See Tim Clancy's latest memo on Truth Enterprises, attached. We would like to have some direction on this please.

5. See law office report #53, section III, tax things for Tish, Item 14. This concerns the notice from the Franchise Tax Bd that we received for several months, just labeled "LE, 1859 Geary" and eventually came addressed "LE TEMPLE." The latest on this is that I called Bentzman to help us by calling Franchise Tax Board, but he did not have time, so I called Franchise Tax Board myself. I explained how we had been receiving these notices for several months but couldn't identify them until the latest that came addressed LE TEMPLE, and it finally dawned on us that they must mean the church, and I explained that ours was a tax exempt charitable church corporation, and we did not pay income tax and this did not make sense. It didn't make sense to the woman I talked to either, and she agreed that it must be a computer error, especially after I pointed out to her the mix up in the account number, which had been spaced out to look like a social security number but after we doubled checked, it turned out to be our federal employer identification number, divided up to resemble a social security number. She said don't worry and that she would send us an explanation. In the meantime I typed up a letter for attorney Bentzman's signature, confirming the telephone call, and he signed it and it went to SF and Sacramento Franchise Tax Boards. The next day he called Franchise Tax Board himself and they explained after checking that the reason for the mix-up was that the Bank of Montreal had been sending interest statements to the Franchise Tax Board. Apparently every month the Bank of Montreal sends us interest statements on a savings account we have there and Jean Brown deposits that interest into a P.T. account. That must have been interpreted as income by the Franchise Tax Board and thus the mix-up. This is still going on and being unraveled, and a letter is going to the Bank of Montreal explaining the situation. As far as Tish's radio instructions of 11/1 in which she said tell Bentzman to do nothing, get an extension of time, and send her full copies of reports Bentzman filed on annual information returns - by the time those instructions came, the phone call had already been made and the letter sent to the Franchise Tax Board. Also, see Law Office Report #26, dated April 20, 1978 (I am attaching a copy of it) re the late filing of the annual information returns. Tish says there was a mistake on those forms. Sorry but we did not have any clearer directions to go on, nor did we have any figures other than past years to compare. So we did what had to be done in order to get the forms in on time, and Jean and Bentzman and I sat down together and prepared the info returns for 1974, 1976 and 1975, and they all went into together at once, late but finally it was resolved as you will see from the attachment.

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6. Stockton property in the name of P.T. - former Loren Roberts property. Loren Roberts does not come to the church any more and is hostile. His sister Lorine Davis left some months ago also. Years ago he turned over deeds on his property in Stockton and it was recorded in P.T.'s name. At the same time he turned over pink slips on cars and personal papers, and we still have some of those papers. He eventually sold his house himself, but the Stockton property remained in our name and we are still stuck with it. At one point the City wanted to demolish it and I think that was done because it was a public eyesore. Now there are back taxes on it, dating back to 1972, in the total amount of \$766.36. See attached statement of delinquent taxes. McElvane has always said we should pay this because of negative p.r. value, but I have disagreed because the property has been ours for years. We have neglected it and it has been sold to the State for taxes because it ran past the 5 year limit - but we're still listed as owner, along with the State, and we get the tax bill.

We have just received a letter from McFarland Energy Inc. wanting to lease for oil and gas exploration purposes, for 5 years, pooling this lease with group of other leases to have a large enough block of land in which to drill a gas well, at \$5.00 per acre rental, or \$10 per single lot. In other words, they are offering us \$10 to lease out the lot.

- a. How do we get rid of this property?
- b. Do we have to pay back taxes? What will happen if we dont?
- c. Should we sign the lease and accept the oil/gas offer?

7. Clearances on people to go over:

- a. Esther Johnson, mother in law of Coty Johnson, and son Bobbie. Lives in IA. Her husband, dad of Bobbie, is not a member. They are not separated. He wants her and Bobbie to go, and he has signed consent for the child to go. He has asked her when will she be going overseas, because he wants to move his daughter in the house when she leaves. He told her he bought her clothes to take overseas and he doesnt understand why she's not gone yet. He says he doesnt want his son to get in with the IA gangs. Vee thinks that the real reason for him wanting to get Esther out of there is that he has another woman he wants to bring into the house. The husband has in the past attended the church 6 times; he doesnt go to any other church. The child Bobbie is 12years old.
- b. Melvin Lowery - he is officially off probation as of October 26, and we have the attached Certificate of Discharge to prove it. Archie needs him to stay and work on the crew, because as Archie puts it, he has only 3 consistent workers - Melvin, Don Davis, and David Gallie. So as far as we are concerned, legally Melvin is okay to go, but it will be awhile because of the tremendous workload on the crew, with the crating and the packing of the barrels, etc.

BB- 31-6-43



8. Law Office overseas supplies - Shipments are going out with each person that goes over, in duffel bags. We have been able to procure everything so far, and I think the only thing we will have to buy is the ~~paper~~ legal ruled pleading paper, the onionskin paper, and the batteries, earphones, foot pedal, and cassettes for the tape recorders. Otherwise, ~~we~~ we have access to everything else. It has to go out little by little in the duffel bags, because there is such a rush on Patty's christmas stuff, and both items have equal priority. If we crate it, you wont get it for a year. So, into duffel bags it will go. Don Davis has been able to score a great deal in his late night garbage runs, in the financial district outside of stationary stores, etc. I have packed up a bunch of beautiful large legal size envelopes he found, about 200 of them white Japanese rice paper, beautiful grain to it, and some more manila envelopes which are imprinted First Class Mail on them. He found a huge crate of the stuff and that will fo over on one of the regular crates, but I scavenged about 300 out for us. Be sure to check the inventories - I labeled everything and wrapped each item in plastic, labeled "BEA ORSOT, LAW OFFICE, RUSH" or BEA GRUBBS. I wanted to keep the law office stuff out of Patty's bags because I was afraid that Patty's bags would go on upriver but apparently everything is all mixed up so check each enventory carefully to catch the stuff before it goes on to Patty.
9. One question that was asked previously was how many people remain back here who gave property. LA is still echecking on this, but Vee recalls:  
Clara Causey - she stopped coming, didn't want to leave her children.  
Hunnicutts - they are working on wife's passport.  
Dorothy Lewis - not ready yet.  
Exie Eleby - Vee says there is no way that Exie would ever leave Melita Gibson, the child of which she is legal guardian and Jean Gibson is the natural mother, behind. So that puts us in an awkward position as Jean Gibson's latest attitude is relief that the child light remain with her rather than go with Exie overseas. If we get court permission for the child to travel with Exie, we risk Jean Gibson's attitude; if we have Exie remain, we risk problems because hers is the case where the deed is being challenged byher son who says it was a forgery and he never signed over his interest to her before she gave it to P.T. We have heard nothing further from him on that, and Vee remembers that Exie's son is very ill in the hospital right now so that may be done with...
10. Mary Baldwin is overseas. She should write to her children right away. Apparently one daughter is a co-signer on her checks, and has not been able to cash the cheks since Mary went over, but told Vee she is planning to sign Mary'sname to them and will not go through the process of forwarding the checks to Mary. Has not heard from Mary at all and this does not help the situation. When Mary lived in LA, she did not know how to write and this may be one reason she has not written to children, but by now, knowing Jonestown, she may have been taught to write - someone should look into this case.

BB-31-b-44

## 11. Taxes

- a. Shanda and Bruce Oliver - someone should sit down with them and fill out the attached card - no refund will come without it. It's probably because they're married and Shanda's first income tax return using the name Oliver.
  - b. Annette Jones - latest received from IRS on tax liability due.
  - c. Danny & Edith Kutulas - statement of adjustment to account on 1974 income tax return. I'm not sure if this is a bill or a refund. Judging from the code number explanation on the reverse side for #01 and 30, it sounds like there was a penalty for not filing and tax unpaid when due; but then the penalty was eliminated...???
  - d. Patricia Cartmell - latest notice from IRS on tax due for 1975, \$39.66
12. Sale of Ernest Jones property - escrow has closed and the money is held up until a 2nd trust deed is cleared up - apparently Ernest Jones owed on a 2nd trust deed and Mac needs to know if it was paid off and to whom and where can he get proof of it being paid off without having to go to a title company and paying \$13 an hour for them to make a search. See attached page describing the deed of trust in question. We used to have a file on this property but I cannot find it anywhere, and the sale is held up until this is settled. This question has been asked over the radio but in case more clarification is needed, here it is.
13. Ray and Agnes Jones refund on 1973 taxes - when I was overseas, Tish suggested possible way to try to get refund on tax which was filed way past statute of limitations, alleging having been out of the country and records missing, etc. Here is a notice from the IRS for tax returns filed for Ray and Agnes for 1973, denying the refund because the return was filed more than 3 years after due date. I checked our file on the return that was prepared by Harold/Tish earlier this year and the refund they would be getting is \$600. So please have someone (Jann Gervich) get together with Tish and with Ray and Agnes and prepare such a letter and send it in, either to me to forward on or direct to IRS. Considering the amount of refund involved it might be worth it, but I don't know what the odds are that they will get anything. On closer look, they also got a denial letter for 1972, so please combine into 1 letter their request for reconsideration for both the 1973 and 1972 returns. Copies of letters from IRS are attached.
14. After I got back from overseas, waiting for me was a note from Harriet asking for stuff to bring with me to overseas - well it didn't reach me til I got back but what I'm wondering is, will you still want the stuff? She asks for xeroxes of rough drafts of TOS letters, drafts of corporate documents that he did; names of cases he represented us on, etc. Medlock file. LA apartment file.

BB- 31-6-45

and xeroxes of any other thing where he shows himself as our counsel. Will you still need this for your work with Mark? Sorry I didn't get the note til I came back because obviously it would have helped a great deal, considering the content of Charles' briefcase when we got there.

15. FOIA on Tom Adams FCC License - attached is copy of latest letter from the attorney in Washington who is pursuing FOIA for us to try to find the Goldwater file. The FOIA stuff hasn't been sent us by the attorney yet; tomorrow Tom is going to call him in the morning and ask him to send whatever file material he finds direct to Tom rather in care of Bentzman so that we bypass Garry's office, since the monitored conversations may very likely contain our remarks about Garry et al, and that could prove to be embarrassing and uncomfortable. We want to get the file direct, and we want to deal direct with the attorney in Washington, because as it stands now, we are paying double, a bill to the Washington attorney and a bill to Bentzman for the time that he has us in his office explaining ~~what's what~~ the Washington attorney's letters to us and setting up conference calls.

BB-31-b-46

1 PATRICK SANSFIELD HALLINAN  
Hallinan & Blum  
2 345 Franklin Street  
San Francisco, California 94102  
3  
4 Telephone: (415) 861-1151  
5 Attorney for Defendant  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10 PEOPLES TEMPLE OF THE DISCIPLES )  
OF CHRIST, a nonprofit corporation,) )  
11 JEAN BROWN, and JAMES McELVANE, )  
12 Plaintiffs, ) NO. 740531  
13 v. ) ANSWER TO COMPLAINT  
14 TIMOTHY OLIVER STOEN, )  
15 Defendant. )  
16

17 Defendant answers to complaint herein as follows:

- 18 1. Defendant denies each and every allegation of paragraphs  
19 III, IV, V, VI, X, XI, XV, XVI (first paragraph so numbered), XVI  
20 (second paragraph so numbered), XVII, and XVIII.  
21 2. Answering paragraph VII, defendant admits that in  
22 February 1977 he joined the PEOPLES TEMPLE commune in Guyana,  
23 South America, but denies each and every other allegation therein.  
24 3. Answering paragraph VIII, defendant admits the allegations  
25 in the second and third sentences (lines 18-20), but denies each  
26 and every other allegation therein.

BB-31-6-47  
-1-

1           4. Answering paragraph IX, defendant admits that in February  
2 1978 he claimed that he and his wife have spent over \$18,000 in  
3 the attempt to return their son to them both, but denies each  
4 and every other allegation therein.

5           5. Answering paragraph XIII, defendant denies the allegations  
6 contained in lines 21 and 22.

7           6. Answering paragraph XIV, defendant denies the allegations  
8 contained in the sentence in lines 4 through 8.

9 FIRST DEFENSE: UNCLEAN HANDS--DISOBEDIENCE OF COURT ORDER

10           7. Plaintiffs are guilty of wrongful conduct, contempt of  
11 court, and unclean hands in connection with the transaction and  
12 subject matter of their suit (i.e., an alleged personal vendetta  
13 involving the custody of defendant's child John Victor Stoen) in  
14 that they are contumaciously detaining said child in direct  
15 violation of a California Superior Court order granting joint  
16 legal custody of the child to defendant Stoen and his wife Grace.  
17 On November 18, 1977, in Civil Case No. 719147, the Superior Court  
18 of the State of California for the City and County of San Francisco  
19 found that Rev. Jim Jones, the leader of plaintiff PEOPLES TEMPLE,  
20 had been properly served and determined that he is in violation  
21 of its order to appear. The Court ordered:

22           a. "that Reverend Jim Jones will immediately deliver  
23 the minor, JOHN VICTOR STOEN, to the Petitioner";

24           b. that "the District Attorney of the City and County of  
25 San Francisco shall take all actions necessary to locate Reverend  
26 Jim Jones and to secure Reverend Jim Jones' compliance with this

1 order";

2 c. that petitioner "is granted leave to institute contempt  
3 proceedings against the Reverend Jim Jones."

4 A copy of the Order is attached hereto as Exhibit A and made  
5 a part hereof.

6 Upon being served this order on November 18, 1977, PEOPLES  
7 TEMPLE attorney Charles Garry was quoted in the November 19 "San  
8 Francisco Examiner" as saying, "Jones will have to decide how to  
9 respond to the court action." Plaintiff PEOPLES TEMPLE, as the  
10 alter ego of Reverend Jim Jones, is currently holding John Victor  
11 Stoen in Guyana, South America. Plaintiffs PEOPLES TEMPLE, BROWN,  
12 and McELVANE are knowingly aiding and abetting in the continuing  
13 disobedience of this Superior Court order.

14 SECOND DEFENSE: UNCLEAN HANDS--PERJURY IN COMPLAINT

15 8. Plaintiffs are guilty of perjury, conspiracy to commit  
16 perjury, fraud, and unclean hands in connection with the trans-  
17 action of their suit in that they knowingly conspired to, and did  
18 in fact, include perjury as paragraph VI (and elsewhere) of their  
19 verified complaint. Paragraph VI alleges, inter alia, that  
20 defendant consulted with PEOPLES TEMPLE member Maria Katsaris and  
21 "obtained confidential information concerning ... certain sexual  
22 advances made by her father towards her when she was a child."  
23 Paragraph VI further alleges that in April or May, 1977, defendant  
24 advised "Maria Katsaris that she should go to Guyana to avoid the  
25 possibility of her father's instituting conservatorship proceedings."

26 All of the allegations of paragraph VI of the complaint,

-3-BB-31-6-49

1 including particularly the aforementioned, are false. Defendant  
2 is informed and believes and thereon alleges that these allegations  
3 were contrived for the sole purpose of getting defendant removed  
4 as attorney for Steven Katsaris. Incorporated herein by reference  
5 is the Declaration by Steven A. Katsaris opposing Application for  
6 Preliminary Injunction, filed in the within action and signed  
7 by Steven A. Katsaris. Said declaration includes as an exhibit  
8 within the lawsuit attached thereto a hand-written letter sent by  
9 Maria Katsaris to her father in August 1977 which is inconsistent  
10 with the aforesaid allegations. Said declaration also includes as  
11 an exhibit a professional polygraph report, dated May 3, 1978, of  
12 a lie detector examination voluntarily undertaken by Steven Katsaris;  
13 it concludes that he "is telling the truth" in answering "no"  
14 to the itemized test questions, including "Did you ever make any  
15 sexual advances toward Maria Katsaris?"

16 Defendant is informed and believes and thereon alleges that  
17 on July 1 and 2, 1978, the falsehoods contained in paragraph VI of  
18 the complaint were knowingly contrived, with no participation  
19 whatever by Maria Katsaris, in two long conversations conducted  
20 over international shortwave radio between Jonestown, Guyana and  
21 San Francisco, California on equipment owned by plaintiff PEOPLES  
22 TEMPLE and operated by its members, including plaintiff BROWN.  
23 Defendant is informed and believes and thereon alleges with respect  
24 to these conversations that:

25 a. the participants therein were all members of PEOPLES  
26 TEMPLE and were acting as agents of plaintiffs PEOPLES TEMPLE,

1 BROWN, and McELVANE ;  
2       b. the participants in Jonestown, Guyana included Teresa  
3 Buford and Harriet Tropp; those in San Francisco included June  
4 Crym, Tom Adams, and plaintiff BROWN;  
5       c. codes were used for real names and events throughout  
6 these conversations in violation of the regulations of the  
7 Federal Communications Commission;  
8       d. inconsistent stories were put forward and discussed  
9 as to what statement should be given attorney Charles Garry  
10 (code names "Dr. Iverson" and "Pete") by plaintiffs BROWN and  
11 McELVANE as to exactly "when" defendant advised Maria Katsaris, as  
12 to the subjects of defendant's consultations with her, as to the  
13 course of action he suggested for her, and as to the intermediaries  
14 used in the consultations to allow for different geographical  
15 locales for "attorney" and "client";  
16       e. a participant in Jonestown indicated that PEOPLES TEMPLE  
17 members Eugene Chaikin, Sandra Bradshaw, and Jim Jones would be  
18 the persons who would have the final approval on the version to be  
19 submitted to Garry;  
20       f. it was decided that neither BROWN nor McELVANE, although  
21 the only individual plaintiffs in the action, would be allowed  
22 to verify the complaint containing the false story because they  
23 were too important to the current operations of PEOPLES TEMPLE  
24 in the United States to risk, should worse come to worst, a  
25 perjury indictment;  
26       g. it was decided instead that Carol Stahl, the president



1 of plaintiff PEOPLES TEMPLE only in name, would verify the  
2 complaint even though she was unknowledgeable as to the relevant  
3 facts because she was expendable to operations in the United States  
4 and could be shipped to Guyana;

5 h. the version ending up as paragraph VI of the complaint  
6 was finally approved by Chaikin, Bradshaw, and Jones as the story  
7 best calculated to induce a judge to erroneously believe that  
8 defendant had misused confidential information in the suit filed  
9 by Steven Katsaris against Jim Jones and PEOPLES TEMPLE in  
10 Mendocino County on May 16, 1978; and

11 i. the aforesaid participants decided it would be too  
12 difficult to contrive a satisfactory "specific" story with  
13 respect to misuse of confidential information by defendant in  
14 the Medlock lawsuit and the Cobb lawsuit, and therefore Garry was  
15 to be told to formulate a consolidated complaint for an injunction  
16 so as to use the false specific allegations relating to Steven  
17 Katsaris as a lever for removing defendant from the Medlock suit  
18 and the Cobb suit (for which only "generalized conclusions" would  
19 be alleged).

20 The allegations inserted into paragraph VI of the complaint  
21 in this action are totally false. The complaint was verified  
22 "under penalty of perjury" by the president of plaintiff PEOPLES  
23 TEMPLE, i.e., Carol Stahl, on July 3, 1978.

24 THIRD DEFENSE: UNCLEAN HANDS--SUPPRESSION OF EVIDENCE

25 9. Plaintiffs are guilty of contempt, wrongful conduct, and  
26 unclean hands in connection with the transaction and subject

1 matter of their suit in that they have willfully conspired to  
2 suppress, and have in fact suppressed, evidence necessary to a  
3 proper disposition of the suit (including the application for a  
4 preliminary injunction), i.e., the testimony of Carol Stahl,  
5 president of plaintiff PEOPLES TEMPLE. Carol Stahl is the only  
6 person to have signed the verification of the complaint herein  
7 (pursuant to the requirement that a verification be attached  
8 to any complaint which serves as the application for an  
9 injunction). Defendant is informed and believes and thereon  
10 alleges that on or about July 4, 1978, plaintiffs ordered Carol  
11 Stahl immediately to leave the United States so as to be outside  
12 the jurisdiction of this court, and that she did in fact so leave.  
13 Defendant is informed and believes and thereon alleges that the  
14 purpose of plaintiffs was to prevent Carol Stahl from being  
15 cross-examined at an evidentiary hearing on the preliminary  
16 injunction and thereby revealing the perjury in paragraph VI  
17 and elsewhere in the complaint.

18 Defendant is informed and believes and thereon alleges  
19 with respect to the above-mentioned international shortwave radio  
20 conversations held on July 1 and 2, 1978, that:

21 a. a participant in San Francisco advised Jonestown that  
22 Charles Garry regarded Carol Stahl as a necessary person to have  
23 available for the hearing;

24 b. someone in Jonestown said that Eugene Chaikin would  
25 disapprove and that it would be too dangerous to the interests  
26 of PEOPLES TEMPLE to have her testify under oath, and that she

1 was too unknowledgeable anyway; and

2 c. a story was contrived between Jonestown and San Francisco,  
3 which was to be delivered to Garry and the court, to the effect  
4 that Carol Stahl's daughter in Guyana required a doctor outside  
5 the country, thereby necessitating Stahl's presence as guardian  
6 to make the arrangements.

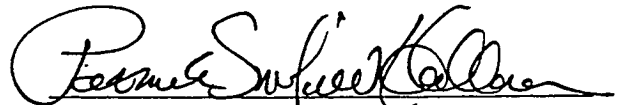
7 FOURTH DEFENSE: UNCLEAN HANDS--ABUSE OF JUDICIAL PROCESS

8 10. Plaintiffs are guilty of wrongful conduct, the tort of  
9 abuse of process, and unclean hands in connection with the  
10 transaction and subject matter of their suit in that they had  
11 ulterior purposes in filing the lawsuit and committed willful  
12 acts in the use of process not proper in the regular conduct  
13 of a judicial proceeding. Defendant is informed and believes  
14 and thereon alleges that these ulterior purposes were to: a) divert  
15 the attention of the public and media from the savage and illegal  
16 practices of PEOPLES TEMPLE and Jim Jones itemized in the three  
17 lawsuits filed on behalf of Steve Katsaris, Wade and Mabel Medlock,  
18 and James Cobb, Jr., respectively; b) coerce defendant to expend  
19 his energies and limited funds in defending this sham lawsuit  
20 based on perjured allegations so as to inhibit his prosecuting of  
21 the three above-mentioned legitimate lawsuits brought on behalf  
22 of truly oppressed victims of PEOPLES TEMPLE; and c) introduce as  
23 part of a court record a document (Exhibit C-2 of the complaint)  
24 which plaintiffs know is totally false and spurious and which  
25 plaintiffs know is so utterly lacking in legal significance that  
26 it could not be introduced in either of the two custody proceedings,

1 involving the same child John Victor Stoen, brought in California  
2 and Guyana, respectively.

3 The willful acts in the use of process not proper include  
4 those set forth in the first three affirmative defenses set  
5 forth above and those inherent in the description of the ulterior  
6 purposes of plaintiffs set forth above.

7  
8 WHEREFORE defendant prays that plaintiffs take nothing by  
9 this action and that defendant be awarded costs and all other  
10 just relief.

11  
12 

13 PATRICK SANSFIELD HALLINAN  
14 for defendant  
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VERIFICATION

I am the defendant in this action; the foregoing answer is true of my own knowledge, except as to those matters stated in it on my information and belief, and as to those matters I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 1, 1978, at San Francisco, California.

*Timothy Oliver Stoen*  
TIMOTHY OLIVER STOEN

BB- 31-6-56



THIS INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN MY OFFICE ATTEST, CERTIFIED

MAR 3 - 1978

ENTERED

NOV 21 1977

CARL M. OLSEN, Clerk  
By *[Signature]* Deputy Clerk

FILED

NOV 18 1977

CARL M. OLSEN, Clerk  
By *[Signature]*

1 JEFFREY A. HAAS  
Attorney at Law  
2 3609 Sacramento Street  
San Francisco, CA 94118  
3 (415) 922-6200  
4 MARGARET RYAN  
Attorney at Law  
5 294 Page Street  
San Francisco, CA 94102  
6 (415) 626-0979  
7 Attorneys for Petitioner

11 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
12 IN THE CITY AND COUNTY OF SAN FRANCISCO

14 In re the marriage of ) No. 719-147  
15 Petitioner: GRACE LUCY STOEN ) ORDER RE CHILD CUSTODY  
16 and )  
17 Respondent: TIMOTHY O. STOEN )

19 The matter of the order to show cause re the custody of the  
20 minor child JOHN VICTOR STOEN, born January 25, 1972 came on  
21 regularly for hearing on November 18, 1977 in Department 13 of the  
22 above entitled court. Petitioner GRACE LUCY STOEN was present  
23 personally and through her attorneys of record, Jeffrey Haas and  
24 Margaret Ryan. Respondent TIMOTHY O. STOEN appeared in pro per.  
25 There was no appearance by Claimant JIM JONES.

26 GOOD CAUSE APPEARING, the court made the following finding  
27 and orders:

- 28 1. Based upon the declarations on file it is found that

MARGARET RYAN  
ATTORNEY AT LAW  
294 PAGE STREET  
SAN FRANCISCO, CA 94102  
415) 626-0979

BB- 31-6-57



THE ABOVE INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN OFFICE. ATTEST, CERTIFIED

MAR 3 - 1978

CLERK OF SUPERIOR COUNTY CLERK OF SAN FRANCISCO, AND EX-OFFICIO CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA AND FOR THE COUNTY OF SAN FRANCISCO

1 Claimant Reverend Jim Jones had actual notice of the pendency of  
2 the proceedings, of his joinder, of this court's order directing  
3 him to appear and of the instant hearing.

4 2. It is also found that contrary to the order of this  
5 court that Reverend Jim Jones failed to appear before this court  
6 on November 18, 1977 at 9:00 AM.

7 3. Based on testimony offered at the hearing of November 18,  
8 1977 and a written stipulation filed therein, the court finds  
9 and orders that it is in the best interest of the minor child,  
10 JOHN VICTOR STOEN that his physical custody, care and control be  
11 awarded to Petitioner GRACE LUCY STOEN, his natural mother. Reasonable  
12 visitation will be reserved to Respondent TIMOTHY O.  
13 STOEN. Petitioner and Respondent will share joint legal custody.  
14 This court hereby fully incorporates by reference the stipulation  
15 between the parties signed on November 18, 1977 and the order  
16 arising therefrom.

17 4. It is ordered that Reverend Jim Jones will immediately  
18 deliver the minor, JOHN VICTOR STOEN, to the Petitioner, GRACE  
19 LUCY STOEN, or to her authorized representative.

20 5. It is ordered that pursuant to Section 4604 of the  
21 California Civil Code, the District Attorney of the City and  
22 County of San Francisco shall take all actions necessary to locate  
23 Reverend Jim Jones and to secure Reverend Jim Jones' compliance  
24 with this order.

25 6. It is further ordered that Petitioner is granted leave  
26 to institute contempt proceedings against the Reverend Jim Jones.

27 7. Based on testimony offered at the hearing on November 18,  
28 1977 by both Petitioner and Respondent and notarized documents

MARGARET RYAN  
ATTORNEY AT LAW  
804 PINE STREET  
SAN FRANCISCO, CALIFORNIA  
415/392-0979

Vol. 1603 p. 3

BB-31-b-58



THE ANNEXED INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN MY OFFICE ATTEST: CERTIFIED

MAR 3 - 1978

CLERK OF SUPERIOR COURT COUNTY CLERK OF SAN FRANCISCO AND DEPUTY CLERK OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

*C. E. [Signature]*

1 provided to and filed with the court; the court finds and orders  
2 that all previous statements signed by either Petitioner or  
3 Respondent or both authorizing one JOYCE TOUCHETTE, JIM JONES, or  
4 any other person to act as guardian of said minor child is hereby  
5 declared null and void.

6 ORDERED this 18th day of November, 1977 and signed the 18th  
7 day of November, 1977.

*Frank S. Finnegan*  
JUDGE OF THE SUPERIOR COURT  
FRANK S. FINNEGAN

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NOV 16 1977 8

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BB-31-b-59



1 PATRICK SANSFIELD HALLINAN  
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3  
4 Telephone: (415) 861-1151  
5 Attorney for Defendant  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10	PEOPLES TEMPLE OF THE DISCIPLES	)	
	OF CHRIST, a nonprofit corporation,	)	
11	JEAN BROWN, and JAMES McELVANE,	)	NO. 740531
		)	
12	Plaintiffs,	)	MEMORANDUM OF POINTS AND AU-
		)	THORITIES IN OPPOSITION TO
13	v.	)	APPLICATION FOR PRELIMINARY
		)	INJUNCTION
14	TIMOTHY OLIVER STOEN,	)	
		)	
15	Defendant.	)	
		)	

17 I. A PRELIMINARY INJUNCTION CANNOT BE ISSUED BECAUSE  
18 PLAINTIFFS ARE BARRED BY THE DOCTRINE OF UNCLEAN HANDS.

19 A. A party seeking the interposition of a court of equity  
20 must come into court with clean hands. Where plaintiffs' conduct  
21 means they have unclean hands, a preliminary injunction will be  
22 denied. London v. Marco (1951) 103 Cal App2d 450, 453, 229  
23 P2d 401.

24 B. As defendant's verified answer makes clear, plaintiffs  
25 PEOPLES TEMPLE, BROWN, and McELVANE have come into this court with  
26 flagrantly unclean hands.

1           1. First, they are aiding and abetting in the disobedience  
2 by Jim Jones of a California Superior Court order dated November 18,  
3 1977, which involves the subject matter of this action, i.e., an  
4 alleged personal vendetta concerning the custody of John Victor  
5 Stoen.

6           2. Secondly, plaintiffs have unclean hands in that it  
7 appears they have knowingly contrived to insert perjury into  
8 paragraph VI of the verified complaint. On July 1 and 2, 1978,  
9 they contrived a totally false story best calculated to induce a  
10 judge to erroneously believe that defendant acquired confidential  
11 information concerning the lawsuit filed by Steven Katsaris. To  
12 do so, plaintiffs had to contumaciously manipulate and dupe their  
13 attorney.

14           3. Thirdly, plaintiffs have unclean hands in that it  
15 appears they have suppressed evidence which is necessary to the  
16 disposition of this case. On July 1 and 2, 1978, they arranged  
17 for Carol Stahl, the nominal president of PEOPLES TEMPLE and the  
18 only person they were willing to let verify the complaint, to  
19 leave the United States and the jurisdiction of this court. It  
20 appears they did this to prevent her being cross-examined at an  
21 evidentiary hearing and thereby revealing the perjury in paragraph  
22 VI of the complaint.

23           4. Fourthly, plaintiffs have unclean hands in that they  
24 are abusing the judicial process. It appears they have ulterior  
25 motives: (a) to divert the attention of the media and the public  
26 from the savage and unlawful acts itemized in the three lawsuits

1 filed against them by defendant, (b) to coerce Timothy Stoen to  
2 expend his energies and limited funds in defending this sham  
3 lawsuit of plaintiffs based on perjured allegations so as to  
4 inhibit his prosecuting of the three legitimate lawsuits brought  
5 on behalf of truly oppressed victims of PEOPLES TEMPLE; and (c)  
6 to introduce as part of a court record a document (Exhibit C-2 of  
7 the complaint) which plaintiffs know is totally false and spurious,  
8 and which plaintiffs know is so utterly lacking in legal signifi-  
9 cance that it could not be introduced in either of the two custody  
10 proceedings, involving the same child John Victor Stoen, brought  
11 in California and Guyana, respectively. None of the foregoing  
12 acts of unclean hands are proper in the use of the judicial process.

13  
14 II. A PRELIMINARY INJUNCTION CANNOT BE ISSUED BECAUSE  
15 PLAINTIFFS HAVE NOT ALLEGED SPECIFIC FACTS BUT SIMPLY HEARSAY  
16 CONCLUSIONS.

17 A. Unless a statement which is in the nature of a con-  
18 clusion is supported by the specific facts or circumstances on  
19 which it rests, it is insufficient to sustain an application for  
20 an injunction. Willis v. Lauridson (1911) 161 Cal 106, 108,  
21 118 P 530. The facts alleged must be so specific that the court  
22 can infer the conclusions drawn by plaintiff were correct.  
23 Provident Land Corp. v. Provident Irrigation Dist. (1937) 22 Cal  
24 App2d 105, 79 P2d 392. Inferences, generalities, presumptions,  
25 and conclusions have no place in a pleading asking for an injunction.  
26 Davitt v. American Bakers' Union (1899) 124 Cal 99, 56 P 775. The

1 facts must be so specific that if they were shown to be false, the  
2 verifier of the complaint would be subject to an indictment for  
3 perjury. Ancora-Citronelle Corp. v. Green (1974) 41 CA3d 146,  
4 115 CR 879 ("The availability of criminal sanctions for perjury  
5 was calculated to insure that injunction applications be sub-  
6 stantially supported by a truthful factual representation, and  
7 made in good faith.").

8 B. Clearly, the complaint and declaration filed by plain-  
9 tiffs herein are totally insufficient as to specificity of facts.  
10 Plaintiffs allege three theories for the removal of Timothy Stoen  
11 as attorney on the three complaints already filed by him. (Since  
12 there are no facts alleged as to future "soliciting" or "accepting"  
13 of professional employment, and no facts alleged as to any specific  
14 items of "confidential" information likely to be disclosed in the  
15 future, plaintiffs' complaint herein should be interpreted as one  
16 to enjoin defendant from "prosecuting any complaints already filed.")

17 The first theory is unlawful "solicitation". But there is not  
18 one fact, not one date, not one conversation put forward as to  
19 when any solicitation occurred as to Steven A. Katsaris, Wade and  
20 Mabel Medlock, or James Cobb, Jr. As their declarations show, each  
21 of these victims of PEOPLES TEMPLE approached Timothy Stoen on  
22 their own initiative and requested his help.

23 The second theory of plaintiffs is that defendant filed his  
24 lawsuits out of a "personal vendetta". While defendant acknow-  
25 ledges he has animus towards PEOPLES TEMPLE and their savage  
26 practices, there is no showing whatever that he acted "solely"

1 out of spite, which is what Rule 2-110 of the California State Bar  
2 Rules of Professional Conduct pertains to. If anything, defendant  
3 has shown an extremely objective and nonvindictive attitude  
4 towards plaintiffs in light of their provocative threats (see his  
5 declaration) that he would be killed and that Jim Jones would  
6 commit "the ultimate sacrifice" (i.e. kill John Victor Stoen) if  
7 defendant did not back off on his custody proceedings. The best  
8 test, of course, in determining whether defendant is acting  
9 "solely" out of spite is to review the complaints he drafted on  
10 behalf of Katsaris, the Medlocks, and Cobb. The wrongdoing of  
11 PEOPLES TEMPLE and Jim Jones were therein supported by allegations  
12 of (1) specific facts (2) verified under penalty of perjury (3)  
13 by persons in a position to know.

14 The third and final theory of plaintiffs in seeking this  
15 injunction is that defendant misused "confidential" information.  
16 For some reason, plaintiffs were unable to come up with anything  
17 specific on either Medlocks or Cobb. As to Medlocks, they alleged  
18 that defendant "planned, advised and arranged the transfer of"  
19 their property. No dates, no facts as to the contents of his  
20 advice, no facts as to what acts he took to "arrange" the transfer.  
21 As to Cobb, plaintiffs do not allege anything except the very  
22 generalized conclusion that the allegations of Cobb's complaint  
23 "concern various incidents about which defendant obtained confi-  
24 dential information during the course of his attorney-client  
25 relationship with plaintiff PEOPLES TEMPLE." What incidents?  
26 The threats to kill Jim Cobb? The department of "Diversions"?

1 The plan to murder 1100 people? For some reason, plaintiffs have  
2 chosen not to itemize these "incidents".

3 There remains, then, only one conceivable theory under which  
4 the plaintiffs may proceed: the alleged misuse of confidential  
5 information affecting the Katsaris lawsuit. In paragraph VI of  
6 PEOPLES TEMPLE's complaint, the defendant is alleged to have  
7 acquired confidential information from Maria Katsaris regarding  
8 possible conservatorship proceedings instituted by her father and  
9 regarding her having been sexually abused by him. But there is no  
10 declaration from Maria Katsaris. She is the only person who could  
11 possibly know what she told Timothy Stoen (who denies in his veri-  
12 fied declaration that any such conversations took place). The  
13 questions become obvious: is PEOPLES TEMPLE afraid to produce  
14 Maria Katsaris and let her testify in court? If so, is it because  
15 their complaint does contain perjury in paragraph VI? Is plaintiffs'  
16 decision to use Carol Stahl as the sole verifier for the purpose  
17 of providing a colorable defense of "hearsay" to an indictment for  
18 perjury?

19 To summarize, plaintiffs have totally failed on any theory  
20 to allege specific facts which have been verified by someone in a  
21 position to know whether they are true or false. Their application  
22 for an injunction should, for this reason alone, be denied.

23 III. A PRELIMINARY INJUNCTION CANNOT BE ISSUED BECAUSE  
24 PLAINTIFFS ULTIMATE CASE IS, IF NOT A SHAM, UTTERLY DOUBTFUL.

25 A. An injunction cannot be granted where plaintiff's  
26 ultimate right to relief is doubtful. Thayer Plymouth Center, Inc.

1 v. Chrysler Motors Corp. (1967) 255 Cal App2d 300, 305-306, 63  
2 Cal Rptr 148; West v. Lind (1960) 186 Cal App2d 563, 569, 9 Cal  
3 Rptr 288.

4 B. Plaintiffs' underlying case for damages is utterly  
5 doubtful. They cannot obtain damages if they have no theory of  
6 a violation of a legal right. But the only theory they have  
7 available to them, taking a look only at plaintiffs pleadings and  
8 construing all ambiguous interpretations in their favor, is para-  
9 graph VI. And the failure of plaintiffs to file a declaration by  
10 Maria Katsaris verifying those allegations shows a reluctance to  
11 let her come forward and testify at a trial on the lawsuit. Fur-  
12 thermore, if the declarations and answer filed on behalf of the  
13 defendant are considered, there appears no reasonable possibility  
14 that a jury or judge could believe the allegations of paragraph VI.  
15 Hence plaintiffs' ultimate case is, if not a sham, utterly  
16 doubtful.

17 IV. A PRELIMINARY INJUNCTION CANNOT BE ISSUED BECAUSE IT  
18 WOULD VIOLATE THE CONSTITUTIONAL GUARANTEES OF FREEDOM OF SPEECH  
19 AND RIGHT TO COUNSEL.

20 A. An injunction cannot be granted where it would inter-  
21 fere with the constitutional guarantees of freedom of speech.  
22 US Const, Amend I; Calif Const, Art I, §9; Rosicrucian Fellowship  
23 v. Rosicrucian Fellowship Non-Sectarian Church (1952) 39 Cal2d,  
24 145, 245 P2d 481. The right to be represented in a civil case by  
25 counsel of one's choice is fundamental. The refusal to recognize  
26 or allow appearance or representation by such counsel is a denial

1 of due process and therefore an act in excess of jurisdiction.  
2 US Const, Amend XIV; Calif Const, Art I, §7(a); Witkin, 1 Cal.  
3 Proc., 2d, Jurisdiction, §194; See Ex parte Gordan (1891) 92 C.  
4 478, 28 P. 489.

5 B. The declarations of Steven A. Katsaris, Wade and Mabel  
6 Medlock, and James Cobb state that Timothy Stoen is their choice of  
7 counsel and request he not be removed. Katsaris says his interest  
8 will be "gravely compromised" if Mr. Stoen were no longer to repre-  
9 sent him. He gives his reasons as including the fact that Mr.  
10 Stoen is "extremely capable", and he attaches Stoen's professional  
11 resume and character references. Any injunction of a court would  
12 constitute a prior restraint on the freedom of speech of everyone  
13 involved, in violation of the Federal and State constitution,  
14 and would also constitute a violation of the constitutional rights  
15 of Katsaris and the Medlocks and Cobb to the counsel of their  
16 constitutional choice.

17 There is no adequate competing consideration because, inter alia  
18 there is no irreparable injury threatened. No specific future acts  
19 of "solicitation" or "accepting" of professional employment are  
20 alleged by plaintiffs. No specific "confidential" information as  
21 to type or source, is alleged as likely to be disclosed. In reality  
22 plaintiffs appear to have one aim in mind; the removal of Stoen  
23 from pending cases as the attorney for the persons claiming to  
24 be victimized by them. Even if plaintiffs' allegations had been  
25 more specifically pleaded and even if they were true, they would  
26 have an adequate remedy of damages at law, i.e. ascertainable



1 damages resulting from the existing lawsuits of Katsaris, Medlocks,  
2 and Cobb.

3 FOR EACH AND ALL OF THE ABOVE REASONS, THE APPLICATION BY  
4 PLAINTIFFS FOR A PRELIMINARY INJUNCTION SHOULD BE DENIED.

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Respectfully submitted,



PATRICK SANSFIELD HALLINAN

Attorney for Defendant

BB-31-b-68

1 CHARLES R. GARRY, ESQ.  
2 GARRY, DREYFUS, McTERNAN, BROTSKY,  
3 HERNDON & PESONEN, INC.  
4 1256 MARKET STREET AT CIVIC CENTER  
5 SAN FRANCISCO, CALIFORNIA 94102  
6 TEL: 864-3131,  
7

8 SUPERIOR COURT OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO  
10

11 PEOPLES TEMPLE OF THE DISCIPLES )  
12 OF CHRIST, a nonprofit corporation, )  
13 JEAN BROWN, and JAMES McELVANE, )

14 Plaintiffs, )

15 vs. )

16 TIMOTHY OLIVER STOEN, )

17 Defendant. )

NO.

ORDER TO SHOW CAUSE  
AND TEMPORARY  
RESTRAINING ORDER

18  
19 On reading the Complaint, supporting Declarations,  
20 and Points and Authorities on file in this action, and it appearing  
21 from these that this is a proper case for issuance of an order to  
22 show cause and a temporary restraining order, and that unless a  
23 temporary restraining order issues, plaintiffs will suffer  
24 irreparable injury before the matter can be heard on notice,  
25 IT IS ORDERED that defendant, TIMOTHY OLIVER STOEN,  
26 appear before this Court in the courtroom of Department

GARRY, DREYFUS, McTERNAN, BROTSKY,  
HERNDON & PESONEN, INC.  
1256 MARKET STREET AT CIVIC CENTER  
SAN FRANCISCO, CALIFORNIA 94102  
TEL: 864-3131

1 No. \_\_\_\_\_, at \_\_\_\_\_ on \_\_\_\_\_,  
2 then and there to show cause why a preliminary injunction should  
3 not be issued enjoining defendant from:

4           1. Soliciting professional employment from ex-members  
5 of PEOPLES TEMPLE, relatives of members of PEOPLES TEMPLE, or  
6 from any other persons for the purpose of generating suits  
7 against plaintiffs or any of them or against any officers,  
8 directors or members of plaintiff PEOPLES TEMPLE;

9           2. Accepting professional employment adverse to his  
10 former client PEOPLES TEMPLE or to any directors, officers or  
11 members of PEOPLES TEMPLE, including all plaintiffs herein,  
12 during the course of which employment he will have or might  
13 have occasion to use any confidential information obtained in  
14 the course of the attorney-client relationship between defendant  
15 and PEOPLES TEMPLE;

16           3. Disclosing under any circumstances any confidential  
17 information obtained during the course of the attorney-client  
18 relationship between defendant and PEOPLES TEMPLE, and between  
19 defendant and any officers, directors or members of PEOPLES  
20 TEMPLE, including all plaintiffs herein, unless such disclosure  
21 is with the written consent of the PEOPLES TEMPLE:

22           4. Prosecuting any complaint already filed which  
23 was filed in violation of the attorney-client privilege or the  
24 prohibition against accepting employment adverse to a former  
25 client, during the course of which defendant will have, or might  
26 have, occasion to use any confidential information obtained

GARRY, DREYFUS, McTERNAN, BROTSKY,  
HERNDON & PESONEN, INC.  
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1 during the course of the attorney-client relationship between  
2 defendant and PEOPLES TEMPLE.

3 IT IS FURTHER ORDERED that, pending the hearing on  
4 the order to show cause, defendant, his agents, officers,  
5 employees, and representatives, and all persons acting in concert  
6 or participating with him, are hereby enjoined from:

7 1. Soliciting professional employment from  
8 ex-members of PEOPLES TEMPLE, relatives of members of PEOPLES  
9 TEMPLE, or from any other persons for the purpose of generating  
10 suits against plaintiffs or any of them or against any officers,  
11 directors or members of plaintiff PEOPLES TEMPLE;

12 2. Accepting professional employment adverse to his  
13 former client PEOPLES TEMPLE or to any directors, officers or  
14 members of PEOPLES TEMPLE, including all plaintiffs herein,  
15 during the course of which employment he will or might have  
16 occasion to use any confidential information obtained in the  
17 course of the attorney-client relationship between defendant  
18 and PEOPLES TEMPLE;

19 3. Disclosing under any circumstances any confidential  
20 information obtained during the course of the attorney-client  
21 relationship between defendant and PEOPLES TEMPLE, and between  
22 defendant and any officers, directors or members of PEOPLES  
23 TEMPLE, including all plaintiffs herein, unless such disclosure  
24 is with the written consent of the PEOPLES TEMPLE;

25 4. Prosecuting any complaint already filed which was  
26 filed in violation of the attorney-client privilege or the

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1 prohibition against accepting employment adverse to a former  
2 client, during the course of which defendant will have, or might  
3 have, occasion to use any confidential information obtained  
4 during the course of the attorney-client relationship between  
5 defendant and PEOPLES TEMPLE.

6 IT IS FURTHER ORDERED that a copy of the Complaint,  
7 Declarations, and Points and Authorities, together with a  
8 copy of this Order to Show Cause and Temporary Restraining  
9 Order, be served on defendant not later than

10 \_\_\_\_\_  
11 Dated: \_\_\_\_\_

12 \_\_\_\_\_  
13 JUDGE OF THE SUPERIOR COURT  
14  
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-4- BB-31-6-72

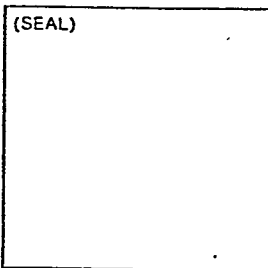
NAME AND ADDRESS OF ATTORNEY: <b>CHARLES R. GARRY, ESQ.</b> <b>GARRY, DREYFUS, McTERNAN, BROTSKY, HERNDON &amp; PESONEN, INC.</b> 1256 Market Street at Civic Center San Francisco, California 94102 ATTORNEY FOR: <u>Plaintiffs</u>	TELEPHONE NO: 864-3131	FOR COURT USE ONLY:
Insert name of court, judicial district or branch court, if any, and Post Office and Street Address: <b>Superior Court of the State of California</b> <b>City and County of San Francisco</b> <b>City Hall, San Francisco, California</b>		
PLAINTIFF: <b>PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST,</b> <b>a nonprofit corporation, JEAN F. BROWN, and</b> <b>JAMES McELVANE</b>		
DEFENDANT: <b>TIMOTHY OLIVER STOEN</b>		
<b>SUMMONS</b>		CASE NUMBER:

**NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.**

**¡AVISO! Usted ha sido demandado. El Tribunal puede decidir contra Ud. sin audiencia a menos que Ud. responda dentro de 30 días. Lea la información que sigue.**

- 1. TO THE DEFENDANT: A civil complaint has been filed by the plaintiff against you. (See footnote\*)**
- a. If you wish to defend this lawsuit, you must, within 30 days after this summons is served on you, file with this court a written pleading in response to the complaint. (If a Justice Court, you must file with the court a written pleading or cause an oral pleading to be entered in the docket). Unless you do so, your default will be entered upon application of the plaintiff, and this court may enter a judgment against you for the relief demanded in the complaint, which could result in garnishment of wages, taking of money or property or other relief requested in the complaint.
  - b. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be filed on time.

DATED: . . . . ., Clerk, By \_\_\_\_\_, Deputy



- 2. NOTICE TO THE PERSON SERVED: You are served**
- a.  As an individual defendant.
  - b.  As the person sued under the fictitious name of: . . . . .
  - c.  On behalf of: . . . . .
- Under:  CCP 416.10 (Corporation)                       CCP 416.60 (Minor)  
 CCP 416.20 (Defunct Corporation)               CCP 416.70 (Incompetent)  
 CCP 416.40 (Association or Partnership)         CCP 416.90 (Individual)  
 Other:
- d.  By personal delivery on (Date): . . . . .

\*The word "complaint" includes cross-complaint, "plaintiff" includes cross-complainant, "defendant" includes cross-defendant, singular includes the plural and masculine includes feminine and neuter. A written pleading including an answer, demurrer, etc., must be in the form required by the California Rules of Court. Your original pleading must be filed in this court with proper filing fees and proof that a copy thereof was served on each plaintiff's attorney and on each plaintiff not represented by an attorney. The time when a summons is deemed served on a party may vary depending on the method of service. For example, see CCP 413.10 through 415.40.

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1 CHARLES R. GARRY, ESQ.  
2 GARRY, DREYFUS, McTERNAN, BROTSKY,  
3 HERNDON & PESONEN, INC.  
4 1256 Market Street at Civic Center  
5 San Francisco, California 94102  
6 Telephone: 864 3131

7 Attorneys for Plaintiffs

8 SUPERIOR COURT OF CALIFORNIA

9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10  
11 PEOPLES TEMPLE OF THE DISCIPLES OF  
12 CHRIST, a nonprofit corporation,  
13 JEAN F. BROWN, and JAMES McELVANE,

14 Plaintiffs,

15 vs.

16 TIMOTHY OLIVER STOEN,

17 Defendant.

NO.

COMPLAINT FOR TEMPORARY  
RESTRAINING ORDER,  
PRELIMINARY AND PERMANENT  
INJUNCTIONS, AND DAMAGES  
[C.C. §§3333, 3422;  
C.C.P. §§526, 527]

18  
19 Plaintiffs allege:

20 I

21 Plaintiff PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST,  
22 hereinafter "PEOPLES TEMPLE," is, and at all times mentioned  
23 herein was, a nonprofit corporation organized and existing under  
24 and by virtue of the laws of the State of California, with its  
25 principal place of business in the City and County of San  
26 Francisco. Plaintiffs BROWN and McELVANE are individuals and

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1 are members of plaintiff PEOPLES TEMPLE.

2 II

3 Defendant is, and at all times mentioned herein was,  
4 an attorney at law with his office in the City and County of  
5 San Francisco.

6 III

7 Defendant served as chief legal counsel for plaintiff  
8 PEOPLES TEMPLE from 1970 until approximately August of 1977. He  
9 represented plaintiff PEOPLES TEMPLE in various litigation  
10 matters, drafted various legal documents for plaintiff PEOPLES  
11 TEMPLE, drafted amendments to PEOPLES TEMPLE corporate articles,  
12 drafted PEOPLES TEMPLE's corporate bylaws, wrote numerous letters  
13 on behalf of plaintiff PEOPLES TEMPLE, and negotiated numerous  
14 transactions, including real estate transactions, on behalf of  
15 plaintiff PEOPLES TEMPLE, as its attorney. As legal counsel he  
16 routinely gave legal advice to the Board of Directors, officers  
17 and members of plaintiff PEOPLES TEMPLE, including plaintiffs  
18 BROWN and McELVANE.

19 IV

20 During his years as legal counsel to plaintiff PEOPLES  
21 TEMPLE, and in the course of the attorney-client relationship  
22 between plaintiff PEOPLES TEMPLE and defendant, defendant  
23 acquired an intimate knowledge of the confidential affairs of  
24 each of the plaintiffs. Defendant obtained confidential  
25 information concerning all aspects of plaintiff PEOPLES TEMPLE's  
26 organization, finances, real estate transactions, methods of



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1 operation, and relationships with members, former members, and  
2 relatives of members.

3 V

4 In his capacity as legal counsel for plaintiff PEOPLES  
5 TEMPLE, defendant planned, guided and arranged various real  
6 estate transactions between it and its members. In particular,  
7 defendant planned, advised and arranged the transfer of certain  
8 real property in the County of Los Angeles from Wade B. Medlock  
9 and Mabel M. Medlock to plaintiff PEOPLES TEMPLE.

10 VI

11 In his capacity as legal counsel for plaintiff,  
12 defendant counseled and advised members of plaintiff PEOPLES  
13 TEMPLE concerning possible legal problems that might arise as  
14 a result of the hostility of some of their relatives to plaintiff  
15 PEOPLES TEMPLE. In particular, he advised member Maria Katsaris  
16 concerning possible legal problems that might arise because of  
17 her father's hostile attitude toward plaintiff. During the course  
18 of his consultations with Maria Katsaris, as attorney for  
19 plaintiff PEOPLES TEMPLE, defendant obtained confidential  
20 information concerning her relationship with her father, STEVEN  
21 A. KATSARIS, and certain sexual advances made by her father  
22 towards her when she was a child. In April or May, 1977,  
23 defendant advised plaintiff PEOPLES TEMPLE and Maria Katsaris  
24 that she should go to Guyana to avoid the possibility of her  
25 father's instituting conservatorship proceedings against her and  
26 that, in the event her father should pursue her to Guyana, the

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1 sexual advances towards her by her father should be made public.

2 VII

3 In February 1977 defendant STOEN joined Reverend Jim  
4 Jones and the Peoples Temple commune in Guyana, South America.  
5 In September 1976 defendant had sent John Victor Stoen, a four  
6 year old boy born to defendant's ex-wife, Grace Stoen, there.  
7 Defendant had previously admitted, in an affidavit signed  
8 in 1972, that this child was the son of Jim Jones. In that  
9 affidavit defendant stated that he had asked Jones to sire  
10 a child for him because he had not been able to do so  
11 himself and, in his admiration and respect for Jones, wanted  
12 him to father the child. See Exhibits C-1, C-2 and C-3,  
13 attached hereto.

14 VIII

15 During the period in which defendant was a member of  
16 and legal counsel for PEOPLES TEMPLE, he appeared and said he was  
17 devoted to the PEOPLES TEMPLE and its cause, and to its Pastor,  
18 the Reverend Jim Jones. As late as August 1977, he stated  
19 that he had esteem for Jones and that Jones helped him to develop  
20 an empathy toward the persecuted. As a result defendant said  
21 that he intended to develop a national law firm to help people  
22 who are prosecuted on some pretext, for their religious beliefs.  
23 At that time, defendant STOEN threatened to file a libel suit  
24 against New West Magazine and the Mendocino Grapevine because of  
25 various allegations against the PEOPLES TEMPLE and STOEN  
26 that appeared in those publications. See Exhibits A and B

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1 attached hereto.

2 IX

3 In August 1977, while still counsel for the plaintiff,  
4 a custody battle ensued between defendant, his ex-wife Grace  
5 Stoen, and the Reverend Jim Jones. This battle was accompanied  
6 by a great deal of publicity. In February 1978 defendant STOEN  
7 claimed to have spent over \$18,000 in the attempt to return the  
8 boy to Grace Stoen. See Exhibit D, attached hereto. During this  
9 battle the affidavit described in Paragraph VII, supra, was  
10 made public.

11 X

12 The battle described in Paragraph IX, supra, engendered  
13 feelings of great bitterness and hostility in defendant STOEN,  
14 directed towards Jim Jones, the PEOPLES TEMPLE, and all of its  
15 directors, officers and members. As a result of the bitterness  
16 and hostility engendered by this custody battle, defendant began  
17 a personal vendetta against Jones, the Temple, its directors and  
18 officers and all of its members, including plaintiffs herein.  
19 The actions described in the following paragraphs of this  
20 Complaint were all taken as a part of this personal vendetta.

21 XI

22 Defendant has solicited and continues to solicit, and  
23 has accepted and continues to accept, employment which is  
24 adverse to the interests of plaintiffs and each of them, and  
25 in the course of that solicitation and employment has used and  
26 continues to use confidential information received during the

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1 course of his attorney-client relationship with plaintiff PEOPLES  
2 TEMPLE.

3 XII

4 .On May 22, 1978 defendant filed a complaint for  
5 compensatory and punitive damages for libel on its face and for  
6 slander, in the Superior Court of the State of California in and  
7 for the County of Mendocino, Civil Action #39911, on behalf of  
8 Steven A. Katsaris, against, among others, plaintiff PEOPLES  
9 TEMPLE. The allegations of that complaint concern the relation-  
10 ship between Maria Katsaris and her father, Steven A. Katsaris,  
11 and various statements allegedly made concerning that  
12 relationship. See Exhibit E attached hereto.

13 XIII

14 On June 7, 1978, defendant filed a complaint for  
15 compensatory and punitive damages for conversion based on  
16 coercion and for intentional infliction of emotional distress,  
17 in the Superior Court of the State of California in and for the  
18 County of Los Angeles, Civil Action #243292. That complaint  
19 was filed on behalf of Wade B. Medlock and Mabel M. Medlock  
20 against, among others, plaintiffs PEOPLES TEMPLE and McELVANE.  
21 The subject matter of that action is the real estate transaction  
22 referred to in Paragraph V, supra. See Exhibit F attached hereto.

23 XIV

24 On June 22, 1978 defendant filed a complaint for  
25 compensatory and punitive damages for intentional infliction of  
26 emotional distress and for libel on its face, in the Superior

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1 Court of the State of California in and for the City and County  
2 of San Francisco, Civil Action #739907. That complaint was  
3 filed on behalf of James Cobb, Jr., against, among others,  
4 plaintiffs PEOPLES TEMPLE and BROWN. The allegations of that  
5 complaint concern various incidents about which defendant  
6 obtained confidential information during the course of his  
7 attorney-client relationship with plaintiff PEOPLES TEMPLE.  
8 See Exhibit G attached hereto.

9 XV

10 Defendant utilized confidential information obtained  
11 during the course of his attorney-client relationship with  
12 plaintiff PEOPLES TEMPLE in drafting the complaints described  
13 in Paragraphs XII-XIV supra, and will continue to use such  
14 confidential information in the prosecution of those actions  
15 unless and until he is enjoined by court order from so doing.

16 XVI

17 Defendant's wrongful conduct, as alleged in the  
18 preceding paragraphs of this Complaint, unless and until enjoined  
19 and restrained by order of this Court, will cause great and  
20 irreparable injury to plaintiffs and each of them in that each  
21 of their reputations will be damaged by the publicity generated  
22 by suits brought against them by defendant in the course of his  
23 campaign of harassment and persecution, plaintiffs and each of  
24 them will be forced to spend countless hours in the defense of  
25 these suits, and plaintiffs and each of them will be prejudiced  
26 in the defense of these actions by defendant's wrongful and

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1 illegal use of confidential information in his prosecution of the  
2 suits. Plaintiffs and each of them will be further irreparably  
3 injured by the fact that confidential information concerning  
4 them is being made public by defendant.

5 XVI

6 Plaintiffs and each of them have no adequate remedy  
7 at law for the injuries currently being suffered and which will  
8 continue to be suffered unless and until plaintiff is enjoined  
9 from his wrongful conduct, since it will be impossible for  
10 plaintiffs or any of them to ascertain the precise amount of  
11 damage which will be suffered if defendant's wrongful conduct  
12 is not enjoined, and since, if defendant is not enjoined,  
13 plaintiffs and each of them will be forced to institute a  
14 multiplicity of suits to obtain adequate compensation for their  
15 injuries.

16 XVII

17 As a proximate result of defendant's wrongful conduct  
18 plaintiff PEOPLES TEMPLE has been damaged in the sum of  
19 \$50,000,000.00 due to damage to its reputation and in the sum  
20 of \$500,000.00 in attorneys' fees. Plaintiffs, and each of  
21 them, will be further damaged in like manner so long as defendant's  
22 conduct continues. The full amount of such damages is not now  
23 known to plaintiffs, or to any of them.

24 XVIII

25 Defendant did the things herein alleged with intent to  
26 harass and oppress plaintiffs and each of them, and such acts

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1 were done maliciously and oppressively. Plaintiffs, and each  
2 of them, are therefore entitled to punitive damages in the sum  
3 of \$100,000,000.00.

4 WHEREFORE, plaintiffs, and each of them, pray judgment  
5 against defendant as follows:

6 1. For an order requiring defendant to show cause,  
7 if any he has, why he should not be enjoined as hereinafter  
8 set forth, during the pendency of this action;

9 2. For a temporary restraining order, a preliminary  
10 injunction, and a permanent injunction, all enjoining defendant  
11 and his agents, servants, and employees, and all persons acting  
12 under, in concert with, or for them from:

13 a. Soliciting professional employment from  
14 ex-members of PEOPLES TEMPLE, relatives of members of PEOPLES  
15 TEMPLE, or from any other persons for the purpose of generating  
16 suits against plaintiffs or any of them or against any officers,  
17 directors, or members of plaintiff PEOPLES TEMPLE;

18 b. Accepting professional employment adverse to  
19 his former client PEOPLES TEMPLE or to any directors, officers  
20 or members of PEOPLES TEMPLE, including all plaintiffs herein,  
21 during the course of which employment he will have or might have  
22 occasion to use any confidential information obtained during  
23 the course of the attorney-client relationship between defendant  
24 and PEOPLES TEMPLE.

25 c. Disclosing under any circumstances any  
26 confidential information obtained during the course of the

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1 attorney-client relationship between defendant and PEOPLES TEMPLE,  
2 and between defendant and any officers, directors or members  
3 of PEOPLES TEMPLE, including all plaintiffs herein, unless such  
4 disclosure is with the written consent of the PEOPLES TEMPLE.

5 d. Prosecuting any complaint already filed, which  
6 was filed in violation of the attorney-client privilege or the  
7 prohibition against accepting employment adverse to a former  
8 client, during the course of which the defendant will have,  
9 or might have, occasion to use any confidential information  
10 obtained during the course of the attorney-client relationship  
11 between defendant and PEOPLES TEMPLE.

12 3. For damages in the sum of \$50,500,000.00 plus  
13 damages in such further sums as may be sustained and as are  
14 ascertained before final judgment herein;

15 4. For punitive damages in the sum of \$100,000,000.00;

16 5. For costs of suit herein incurred; and

17 6. For such other and further relief as the Court  
18 deems proper.

19 Dated: July \_\_, 1978.  
20  
21

22 \_\_\_\_\_  
CHARLES R. GARRY  
Attorney for Defendants  
23  
24  
25  
26



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1 MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF  
2 MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY  
3 INJUNCTION

4 I. PLAINTIFFS ARE ENTITLED TO A PRELIMINARY INJUNCTION TO  
5 PRESERVE THE STATUS QUO PENDING A DETERMINATION OF THE  
6 MERITS OF THIS ACTION.

7 In determining whether to grant a preliminary injunction  
8 the trial court must balance the equities and determine which party  
9 is more likely to be injured by the exercise of its discretion.  
10 The discretion must then be exercised in favor of that party.  
11 Continental Bakery Co. v. Katz, 68 Cal. 2d 512 at 528 (1968);  
12 California State Univ., Hayward v. National Collegiate Athletic  
13 Ass'n., 47 Cal. App. 3d 533 at 544 (1975).

14 In the above-entitled case the equities are clearly  
15 on the side of plaintiff. The facts, as set forth in the  
16 Complaint and in the Declaration of Carol Stahl, show that  
17 defendant STOEN is engaged in a personal vendetta against  
18 plaintiff PEOPLES TEMPLE, the Reverend Jim Jones, and all of the  
19 other plaintiffs herein. In the course of that vendetta he has  
20 solicited, and continues to solicit, professional employment  
21 adverse to his former clients, plaintiffs herein, in the course  
22 of which he has disclosed, and will continue to disclose,  
23 confidential information obtained during the course of his  
24 attorney-client relationship with plaintiffs. This conduct is  
25 prohibited by California Business and Professions Code Section  
26 6068(e), which states:

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1 It is the duty of an attorney: . . .

2 (e) To maintain inviolate the confidence, and  
3 at every peril to himself to preserve the secrets,  
4 of his client.

5 The conduct engaged in by defendant and described in the  
6 Complaint and Declaration of Carol Stahl in the within-entitled  
7 case is also prohibited by California State Bar Rules of  
8 Professional Conduct, Rules 2-101, 2-110, and 4-101. Rule 2-101  
9 states in pertinent part:

10 A member of the State Bar shall not solicit  
11 professional employment by advertisement or  
12 otherwise.

13 Rule 2-110 states:

14 A member of the State Bar shall not accept  
15 employment to accomplish any of the following  
16 objectives, nor shall he do so if he knows  
17 or should know that the person who employs  
18 him wishes to accomplish any of the following  
19 purposes:

20 (1) Bring a legal action, conduct a defense,  
21 or assert a position in litigation, or other-  
22 wise take steps, solely for the purpose of  
23 harassing or maliciously injuring any person  
24 or to prosecute or defend a case solely out  
25 of spite.

26 (2) Present a claim or defense in litigation  
that is not warranted under existing law, unless  
it can be supported by good faith argument for  
an extension, modification or reversal of  
existing law.

(3) Take or prosecute an appeal solely for  
delay, or for any other reason not in good  
faith.

Rule 4-101 states:

A member of the State Bar shall not accept  
employment adverse to a client or former  
client, without the informed and written consent  
of the client or former client, relating to a  
matter in reference to which he has obtained  
confidential information by reason of or in

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1 the course of his employment by such client  
2 or former client.

3 An attorney is forbidden to do either of two things  
4 after severing his relationship with a former client. He may  
5 not do anything which will injuriously affect his former client  
6 in any matter in which he formerly represented him nor may he  
7 at any time use against his former client knowledge or information  
8 acquired by virtue of the previous relationship. Wutchumma Water  
9 Co. v. Bailey, 216 Cal. 564 at 573 (1932); Sheffield v. State Bar,  
10 22 Cal. 2d 627 at 630 (1943); Earl Scheib, Inc. v. Superior Court  
11 of Los Angeles County, 253 Cal. App. 2d 703 at 706.

12 The courts have interpreted these rules to forbid  
13 subsequent representation of another against a former client  
14 not merely when the attorney will be called upon to use  
15 confidential information obtained in the course of the former  
16 employment, but in every case when, by reason of such subsequent  
17 employment, he may be called upon to use such confidential  
18 information. Galbraith v. State Bar, 218 Cal. 329 at 332-333  
19 (1933); Sheffield v. State Bar, supra at 630; Earl Scheib, Inc.  
20 v. Superior Court of Los Angeles County, supra at 707.

21 The injunction sought herein seeks only to restrain  
22 defendant from engaging in conduct which is clearly prohibited  
23 by Business and Professions Code Section 6068(e) and Rules  
24 2-101, 2-110, and 4-101 of the State Bar Rules of Professional  
25 Conduct, as those Rules have been interpreted by the California  
26 Supreme Court. This restraint is necessary to prevent further

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1 damage to plaintiffs from defendant's disclosure of confidential  
2 information and the adverse publicity generated by that disclosure.  
3 The injunction is also necessary to protect the plaintiffs from  
4 the necessity of defending themselves against suits filed only  
5 as a result of the unethical conduct of defendant.

6 The purpose of a preliminary injunction is to preserve  
7 the status quo pending the final determination of the merits of  
8 the action. Continental Bakery Co., supra at 528; United States  
9 Hertz, Inc. v. Niobrara Farms, 41 Cal. App. 3d 68 at 79 (1974).  
10 Such preservation is obviously crucial in this case. Defendant  
11 filed three suits in the course of the thirty day period between  
12 May 22 and June 22, 1978. If he is not restrained by court order,  
13 he will continue to solicit adverse employment and to file  
14 suits against plaintiff, all to the detriment of plaintiff's  
15 reputation, and to their damage through the disclosure of  
16 confidential information, and the expenditure of time, money and  
17 energy in defense of these suits. The status quo can be  
18 preserved only by the issuance of the court order requested herein.

19  
20 II. PLAINTIFFS ARE ENTITLED TO A TEMPORARY RESTRAINING ORDER,  
21 BECAUSE PLAINTIFFS WILL SUFFER IRREPARABLE INJURY UNLESS  
22 DEFENDANT IS RESTRAINED BY COURT ORDER, PENDING A  
23 HEARING ON THIS MATTER, FROM THE ACTIONS COMPLAINED OF  
24 HEREIN.

25 C.C.P. §527(a) provides that a temporary restraining  
26 order may be granted without notice where great or irreparable  
injury would result to the applicant before the matter can be heard  
on notice.

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SAN FRANCISCO, CALIFORNIA 94102  
TEL: 864-3131

1 Defendant in this case is involved in a personal  
2 vendetta against plaintiffs. In the course of this vendetta  
3 he has already filed three suits against plaintiffs and has  
4 disclosed much confidential information concerning plaintiffs.  
5 Only one of these complaints has been served upon any of the  
6 plaintiffs to this date. But if defendant is not immediately  
7 restrained from proceeding with the vendetta pending a hearing  
8 on this matter, he may succeed in serving plaintiffs with the  
9 remaining two complaints, which will generate further damaging  
10 publicity. If not restrained, he may also disclose further  
11 confidential information and file further suits, all to the  
12 irreparable injury of plaintiffs and each of them, as described  
13 above and in the Declaration of Stahl.

14  
15 CONCLUSION

16  
17 For all of the reasons stated above, plaintiffs  
18 respectfully request that the Temporary Restraining Order  
19 and the Order to Show Cause attached hereto issue forthwith.  
20  
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1           DECLARATION OF CAROL STAHL IN SUPPORT OF COMPLAINT FOR  
2           TEMPORARY RESTRAINING ORDER, PRELIMINARY AND PERMANENT  
3           INJUNCTIONS, AND DAMAGES

4                     Carol Stahl declares:

5                     1. I am president of plaintiff PEOPLES TEMPLE OF THE  
6           DISCIPLES OF CHRIST (hereinafter "PEOPLES TEMPLE"), a nonprofit  
7           corporation.

8                     2. I have personal knowledge of the following facts and  
9           am competent to testify as to the truth of these facts if called  
10          as a witness.

11                    3. Defendant TIMOTHY OLIVER STOEN served as legal  
12          counsel for PEOPLES TEMPLE from 1970 until approximately July  
13          of 1977. He represented plaintiff PEOPLES TEMPLE in various  
14          litigation matters, drafted various legal documents for plaintiff  
15          PEOPLES TEMPLE, drafted amendments to PEOPLES TEMPLE corporate  
16          articles, drafted PEOPLES TEMPLE's corporate bylaws, wrote  
17          numerous letters on behalf of plaintiff PEOPLES TEMPLE, and  
18          negotiated numerous transactions, including real estate  
19          transactions, on behalf of plaintiff PEOPLES TEMPLE, as its  
20          attorney. As legal counsel he routinely gave legal advice  
21          to the Board of Directors, officers and members of plaintiff  
22          PEOPLES TEMPLE, including plaintiffs BROWN and McELVANE.

23                    4. On June 5, 1978 I was personally served on behalf  
24          of PEOPLES TEMPLE with a complaint for compensatory and punitive  
25          damages, filed in the Superior Court of the State of California  
26          in and for the County of Mendocino, Civil Action #39911.

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1 This complaint was filed by defendant STOEN on behalf of Steven  
2 Katsaris and against, among others, plaintiff herein PEOPLES  
3 TEMPLE. PEOPLES TEMPLE has already been forced to spend  
4 considerable time, energy and funds in responding to this suit.  
5 I am aware of at least two other suits filed by STOEN against ,  
6 PEOPLES TEMPLE and the other plaintiffs in this action, though  
7 none of the plaintiffs herein has yet been served with these  
8 complaints. One of these complaints was filed on June 7, 1978  
9 in the Superior Court in and for the County of Los Angeles,  
10 Civil Action #24392. This complaint was filed by defendant STOEN  
11 on behalf of Wade B. and Mabel M. Medlock against, among others,  
12 plaintiffs herein PEOPLES TEMPLE and McELVANE. The other  
13 complaint was filed on June 22, 1978 in the Superior Court  
14 in and for the City and County of San Francisco, Civil Action  
15 #739907. That complaint was filed by STOEN on behalf of James  
16 Cobb, Jr. against, among others, plaintiffs herein PEOPLES  
17 TEMPLE and BROWN. These complaints may be served upon the  
18 plaintiffs herein, or any of them, any day. As soon as the  
19 above-described complaints are served on plaintiffs, or any of  
20 them, plaintiffs and each of them will be forced to expend more  
21 time, energy and funds responding to these suits.

22           5. In drafting these complaints defendant utilized  
23 and revealed confidential information obtained during the course  
24 of his attorney-client relationship with plaintiffs and each of  
25 them, without the consent of plaintiff PEOPLES TEMPLE or any other  
26 plaintiff herein.

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1                   6. The filing of each of the suits described in  
2 Paragraph 4 supra generated a multitude of news stories adverse  
3 to plaintiff PEOPLES TEMPLE and to the other plaintiffs herein.  
4 These stories appeared in newspapers throughout California.  
5 The adverse publicity generated by these complaints was  
6 particularly adverse in the County of Mendocino, the location  
7 of one of the actions. This publicity has caused irreparable  
8 damage to the reputation of the PEOPLES TEMPLE and of the  
9 other plaintiffs herein.

10                   7. Defendant solicited the professional employment  
11 within the course of which he filed the suits described in  
12 Paragraph 4. He continues to solicit employment adverse to  
13 the interests of his former clients, PEOPLES TEMPLE and the  
14 other plaintiffs herein, for the purpose of harassing and  
15 destroying these plaintiffs.

16                   8. Defendant STOEN's solicitation of employment  
17 adverse to his former clients, plaintiffs herein, and his  
18 violation of the attorney-client privilege of these former  
19 clients is a part of a personal vendetta of defendant STOEN  
20 against the PEOPLES TEMPLE. He will continue this solicitation  
21 and violation of the attorney-client privilege unless and until  
22 he is restrained by court order from so doing.

23                   9. The activities described in the preceding  
24 paragraphs of this Declaration have caused, and will continue  
25 to cause if not immediately restrained, irreparable injury  
26 to the reputation of plaintiff PEOPLES TEMPLE and the other



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1 plaintiffs herein. Irreparable injury has also resulted,  
2 and will continue to result on a daily basis, from defendant  
3 STOEN's continued disclosure of confidential information  
4 concerning plaintiff PEOPLES TEMPLE and the other plaintiffs  
5 herein in the course of his solicitation of employment adverse  
6 to plaintiffs herein and his prosecution of the suits  
7 already filed.

8 I declare under penalty of perjury that the  
9 foregoing is true and correct.

10 This Declaration was executed in San Francisco,  
11 California, on July \_\_, 1978.

12  
13  
14 *Carol Stahl.*  
15 \_\_\_\_\_  
16 CAROL STAHL  
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## Stoen reacts to Grapevine article

# Ukiah weekly target of \$5 million lawsuit

By GEORGE HUNTER

Timothy Oliver "Tim" Stoen, former assistant district attorney for Mendocino County whose beliefs are closely linked to those of the Rev. Jim Jones, pastor of the Peoples Temple Church, is preparing to file a \$5 million lawsuit against the Mendocino Grapevine, a Ukiah weekly.

Stoen, who flew here last weekend from New York City to confer with Ukiah attorney Pat Finnegan, told the Daily Journal that he would also seek damages of some \$13 million from New West, a San Francisco bi-weekly magazine which has carried two "expose" articles relating to Peoples Temple and its pastor.

Stoen said that an article appearing in a recent issue of the Ukiah weekly had damaged his reputation. "I intend to practice law here in Ukiah and it is essential that I clear my name," Stoen said.

"I must show the world that a newspaper cannot wrongfully hurt innocent people without being brought to account."

Noting that he was prepared to do battle on all levels, Stoen said: "I'm a street fighter. People will come to appreciate that fact that I'm a street fighter."

"I feel like Alfred Dreyfus," Stoen said, referring to the French Army officer of the 19th century who was convicted by an Army court and imprisoned on Devil's Island for defending his religious beliefs.

"I'm experienced enough with our jury system to believe in it. I'll put my trust in the system," Stoen said.

Stoen reacted strongly to inferences that he was "afraid" of Rev. Jones. "I want to dispel that allegation," he said.

The former assistant district attorney also was sharply critical to charges that he had used his public office to spy for Jones. "I've always made known my esteem for Jim Jones," he said. "I have nothing to hide and no one can show a single instance where I ever used my public office to show favoritism toward the church.

Stoen charged that the reporting of New West magazine was irresponsible in that the magazine article quoted the Mendocino Grapevine verbatim. Stoen said he would prove the statements to be untrue and malicious in motivation and that the Grapevine violated the newspaper canon of ethics, giving Stoen no chance to reply to the accusations.

The demands for retraction and damages will be contained in a complaint filed here. The suit against New West magazine will be filed in San Francisco.

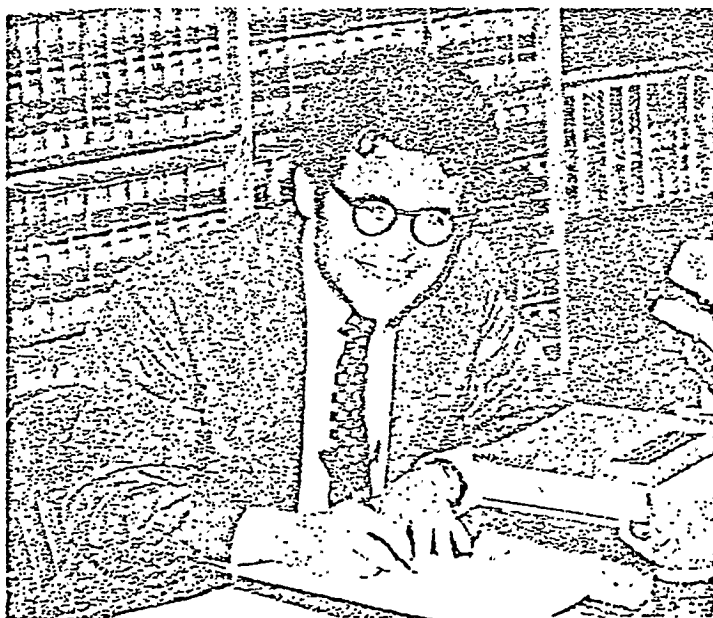
Stoen was "loaned" to San Francisco city and county in 1975 to prosecute voter fraud after a large-scale scandal surfaced. Out of 39 indictments returned by the Grand jury, 37 convictions were obtained. Stoen was then asked by San Francisco District Attorney Joseph Freitas to accept the post

of special prosecutor with a large staff of attorneys to fight organized crime and public corruption. Stoen accepted the post then resigned when he felt that he was needed in Guyana, a small South American country, to help Jones in establishing a communal-type center, Jonestown, for minorities and the underprivileged.

Stoen has established residence in Manhattan in order that he may be admitted to the New York State bar.

"Jones has helped me develop an empathy toward the persecuted," Stoen said. "I intend to develop a national law firm to help people who are prosecuted, on some pretext, for their religious beliefs. Stoen said he was worried about "creeping totalitarianism" that left no room for dissent.

Stoen hopes to attract idealistic young attorneys to his organization.



FORMER ASSISTANT DA TIM STOEN  
"Dreyfus-like inquisition"

BB-31-6-93

EXHIBIT A

# MENDOCINO GRAPVINO

AUGUST 25, 1977

The Weekly Newspaper of Mendocino County, California

NUMBER 166

20¢

Peoples Temple  
Libel Threat

## Peoples Temple Articles Bring Libel Suit Threat

By Vicki Allen

The recent disclosures about the Peoples Temple have resulted in the threat of a libel suit against New West Magazine and the Mendocino Grapvino.

Although no such lawsuit has been filed, a high official of the controversial church says it's coming.

Tim Stoen, former assistant district attorney of Mendocino County, appeared in Ukiah last weekend to consult with attorney Pat Finnegan.

In an interview with the Ukiah Daily Journal, Stoen announced his plans to seek \$13 million in damages against New West and \$6 million against the Grapvino.

Stoen then left town and could not be reached for comment by the Grapvino. Finnegan said he does not know when Stoen will return.

The Grapvino has not been ask-

ed for a retraction and has not received a list of the statements alleged to be libelous.

Articles about the Peoples Temple appeared in the July 21, July 29, Aug. 4 and Aug. 18 issues of the Grapvino.

After New West printed the conclusions of its extensive investigation into the practices of the church, news reports were also published in the San Francisco Examiner, the San Francisco Chronicle and the Press Democrat.

According to Finnegan, Stoen hasn't seen the articles in those publications.

"The articles in the Grapvino came to Tim's attention first," the attorney said.

"We had to start somewhere so we started in Ukiah."

"It's all speculation," said Pano Stephens, the attorney for the Grapvino, who pointed out no suit had been filed.

"Until we receive their claims, we cannot assess what the problem is and we cannot respond."

Once the Grapvino learns what is alleged to be defamatory, Stephens said, then a response will be prepared.

Coincidentally, the day after Stoen announced his legal plans, the San Francisco Examiner published a copyrighted story about a tape recording of Stoen which is being given to the California Attorney General.

According to the page one article, the San Francisco District Attorney's Office says it is turning over a tape of Stoen arranging a payment to an ex-member of the Peoples Temple who claims his name was forged on a property transfer document.

The San Francisco DA's office is investigating allegations that temple leaders took members and forced others to turn property

BB-31-10-94

over to the church.

Tim Refferman, who wrote the Examiner article with Nancy Dooley, said he was not aware Stoen was in the country and had no knowledge of the intended lawsuit.

Finnegan said he doesn't know when the suit will be filed.

The demand for a retraction will be as specific as we can make it," he said.

"Nobody is being sued yet."

Finnegan added, "My plans right now are to file a demand for a retraction."

He also said, "Anything I file will be filed on behalf of Tim Stoen. I'm concerned solely with articles that reflect adversely on Tim Stoen."

If a libel suit is brought against the Grapevine, it will be filed in Mendocino County, Finnegan said. A suit against New West would be filed in San Francisco.

According to the original New West article, 30 parcels of property in Mendocino County were deeded to the Peoples Temple from 1968.

That Aug. 1 copyrighted story contains statements from Grace Stoen, who claims her husband notarized questionable gifts of property to the church.

The magazine also says a 22-year-old Utah man, who took his own life in 1975, was convinced by Stoen to turn over \$10,000 to the church. The article quotes the man's mother.

Former temple members have also told reporters that Stoen appeared to be afraid of the Rev. Jim Jones.

The articles in New West, the Grapevine and other publications were based on interviews with former church members who told of Peoples Temple leaders staging phony cancer cures, lying to the congregation about contributions collected at services, beating members and pressuring them to donate property.

Life inside the temple was said to be "a mixture of Spartan regimentation, fear and self-imposed humiliation."

Rev. Jones started the unorthodox church in Redwood Valley with 100 members in 1965.

The membership reportedly climbed to 20,000 when bases were established in San Francisco and Los Angeles.

Stoen, the church's chief legal advisor, has been a member for several years.

He left his job in the Mendocino County DA's office in May, 1976 to become a special prosecutor for voter fraud in San Francisco County. He resigned from the San Francisco District Attorney's Office in April to join Rev. Jones in Guyana, South America.

Stoen's wife, Grace, who left him earlier this year, is now seeking custody of their five-year-old son.

"I intend to practice law here in Utah and it is essential that I clear my name," Stoen said in the Journal article by editor George Hunter.

He also said, "I'm a street fighter," and compared himself to French Army officer Alfred Dreyfus, who was sentenced to Devil's Island in the last century.

Although the article says Stoen plans to practice law in Utah, it also says he has established residence in New York because he intends to open a law firm to defend people who are prosecuted for their religious beliefs.

It is not known when Stoen left Guyana.

In the Journal article, Stoen said he was given no opportunity to respond to the accusations made

against him, but the Grapevine has been unable to discover his whereabouts.

Rev. Jones has been in Guyana and Charles Gerry, the San Francisco attorney who has been representing the Peoples Temple, has declined to comment.

Last week's Grapevine carried a lengthy article titled "The Other Side of Peoples Temple," based on the church's own newspaper and statements made by prominent people in defense of the church.

Ironically, the New West article noted the Peoples Temple's activities in social and medical programs and its support of the press.

The church supported the four Fresno newsmen who went to jail rather than reveal the names of their news sources and in 1974, the Peoples Temple made donations of more than \$4,000 to 14 media organizations "in defense of a free press."

According to a July 20 article in the Press Democrat, donations included \$300 each to that newspaper and to the Utah Daily Journal.

There is more irony in the fact that Stoen's Utah attorney is a member of the same law firm that is representing Journal publisher Dean DeVries in his lawsuit against the Grapevine and the Grapevine's cross-complaint charging anti-trust activities.

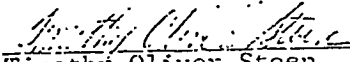
BB-31-b-95

TO WHOM IT MAY CONCERN

I, Timothy Oliver Stoen, hereby acknowledge that in April, 1971, I entreated my beloved pastor, James W. Jones, to sire a child by my wife, Grace Lucy (Grech) Stoen, who had previously, at my insistence, reluctantly but graciously consented thereto. James W. Jones agreed to do so, reluctantly, after I explained that I very much wished to raise a child, but was unable, after extensive attempts, to sire one myself. My reason for requesting James W. Jones to do this is that I wanted my child to be fathered, if not by me, by the most compassionate, honest, and courageous human being the world contains.

The child, John Victor Stoen, was born on January 25, 1972. I am privileged beyond words to have the responsibility for caring for him, and I undertake this task humbly with the steadfast hope that said child will become a devoted follower of Jesus Christ and be instrumental in bringing God's kingdom here on earth, as has been his wonderful natural father.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Timothy Oliver Stoen  
Post Office Box 126  
Ukiah, California 95482

Dated: February 6, 1972

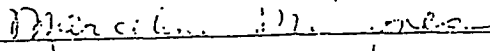
Witnessed:   
\_\_\_\_\_

EXHIBIT C-2

BB-31-6-97

DEAR GENE,

AM REALLY ENJOYING GUYANA. THE PEOPLE ARE SO CONSIDERATE AND HELPFUL. AM VERY IMPRESSED BY THE GOVERNMENT LEADERS.

MY SON, JOHN VICTOR, IS WITH ME AND DOING GREAT. HE CAN READ, HAS DEVELOPED HIS MOTOR COORDINATION TREMENDOUSLY, AND IS LEARNING ALL KINDS OF INTERESTING THINGS ABOUT NATURE. TOM GRUBBS AND HIS OTHER TEACHERS ARE GIFTED THEORETICALLY AND PRACTICALLY. HE IS RECEIVING LOTS OF LOVE AND AFFECTION, AND IS HAPPY AS A LARK.

HAVE BEEN ATTENDING TO VARIOUS LEGAL MATTERS, COOPERATION, COOPERATION WITH IT I WILL BE REPORTING ON THIS IN MY NEXT REPORT ON JAN 15.

REGARDS TO ALL. SINCERELY, *Timothy Allen*



Pub. by Welling & Richter Limited, Georgetown, Guyana, South America



EUGENE CHAIKIN, ESQUIRE  
P.O. Box 15023  
SAN FRANCISCO, CALIFORNIA  
94115  
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AIR MAIL

# Greek tragedy played on worldwide stage

By KATHY HUNTER

Greek tragedy is now being played on a stage which reaches from the remote jungles of Guyana to Ukliah, and from San Francisco to the nation's capitol.

The major roles involve, in the traditional fashion of great theater, two men of high principles brought low by a fatal flaw in their character—one by pride and one by an unquestioning faith which blinded him to reality.

The gods only trouble themselves with those men who are great in spirit and attempt to challenge their Olympian omnipotence—the little men are left relatively undisturbed to play out their own roles in this life, whether they are chosen or thrust upon them by the fates.

Two men—once closer than any brothers—are now locked in a battle to the death, a battle in which no end can be foretold at this time.

The stakes? The future of a six-year-old child and the integrity of a church founded on the premise that it is more

important to love and hold out a helping hand to one's fellow man than to follow the time-honored dogma laid down by established religions.

There are no heroes or villains in this tragedy built upon human frailties—only two desperately driven men fighting for the mind and body of a boy they both claim as their son. The mother of the child, Grace Stoen, stands in the wings awaiting the outcome of the drama which began when she first committed herself to a man dedicated to a cause and who marched to a different drummer.

The woman, hardly more than a girl when she first placed her hand in that of Ukliah Attorney Tim Stoen, became his wife in a moving ceremony conducted by the Rev. Jim Jones in the Peoples Temple at Redwood Valley, filled to capacity by those who wanted to express their joy at the union of these two young people, and all present agreed she could not have been more appropriately named, for she was graciousness personified and was im-

mediately taken into their hearts.

If Grace, as her husband now admits, had any doubts about the new world into which she was entering, she gave no sign and threw herself into the activities of the church which meant so much to her new husband.

A year and a half later, after a most difficult pregnancy, she gave birth to a son, whom her husband promptly called John-John. The Santa Rosa hospital records show that the boy was born at 2:00 p.m. on Jan. 25 of 1972 and that her husband was not only in the hospital with her but had been at her side constantly, before and during the delivery.

The boy, now age six, is far removed from that hospital room in which he wailed his first protesting cry upon entering this world and the home in which he was reared for the next four years by Grace and Tim Stoen.

He is now living in a "quasi-commune" village 100 air miles from Georgetown, Guyana, off the coast of South America, with no telephones and

unreachable except by air. Jim Jones, who established the commune and brought from 850 to 900 of his people there to help the natives learn modern agricultural practices to improve their way of life, claims that John-John is his son and refused to let Grace and Tim see the boy although they had traveled all the way from San Francisco to Guyana seeking to regain the child's custody.

Jones says Tim Stoen signed a paper affirming that John-John was not his son; that he had asked Jones to "wire a child" for him because he was incapable of doing so himself and, in his admiration and respect for Jones, wanted him to father the child.

Stoen maintains that medical tests prove he is more than capable of siring a child. He does not deny signing the statement but said "Jim asked it as a proof of faith" and he at that time, believed so strongly in Jones that he prevailed upon his wife to agree to go along with the statement. Stoen also adds that, as an attorney, he was well

aware the statement would not hold up in court and he now believes that Jones demanded it in order to "hold it over my head" in case he ever decided to leave the church.

"I was a fool," Stoen said in a two-hour telephone interview with this reporter late yesterday.

The rift between Stoen and his wife widened over the years as he became more and more preoccupied with the affairs of the church and she became more and more disenchanted with Jones and his changing attitudes. However, when Jones asked her to go to San Francisco and work with the people there as a counselor and supporter of the church, she agreed to please her husband.

It was in San Francisco that Grace became more and more questioning of Jim Jones and his methods and approaches to people and finally decided that she had "had it" and that to save her sanity she had to get away to "think things out" and plan her future.

Stoen said she left John-John with the Peoples Temple because she felt it best for the child that his normal routine should not be disturbed. Months before, she and her husband had given their power of attorney to Jones and several "trusted nurses" to look after the child's interests in case anything happened to either her or Tim.

Stoen said yesterday: "Grace felt the highest act of love for John-John was to leave him there in an

environment to which he was accustomed until she got established and got her mind together as to the future."

Stoen said, with more than a little bitterness: "We had no idea he would be removed from the country."

He repeated again: "I was a fool."

And what of the other side of the coin? At no time did Stoen permit himself to express anger or animosity toward the Jim Jones "I practically worshipped."

He does, however, believe that the continuing harassments Jones and his family endured in Redwood Valley from those opposed to "nigger lovers" and Jones' philosophy that all men are created equal but "some need more help than others," led to a suspicion of those about him and prompted him to engage personal bodyguards during his last years here.

Stoen also believes that as more and more people came into Jones' church and saw him as a "father figure" or "the second coming," Jones lost touch with reality and saw himself as a saviour of mankind and, according to Stoen, put himself above God—or, at least, as sitting by his right hand.

Stoen said the change became only gradually apparent to him and that, because he believed so firmly in the good the church did, he did not want to burn it in any way.

(Cont'd on Page 2)

EXHIBIT D

# Ukliah Daily Journal

117th Year No. 247 Ukliah, Mendocino County, California Monday, February 27, 1978 12 Pages—8 Page Tab 2 Sections—15 Cents

BB-31-b-99

# A real life Greek tragedy

(Cont'd from Page 1)  
Despite all that has happened he cannot forget the warmth and feeling we have so much of himself to others that he might have reached a point of no return.

He speaks of the children of different races that Jim and his wife, Marceline, adopted, cared for and loved as their very own. He knows of Jim's deep compassion for those in need; of his love of all animal life; of his sincere desire to establish upon this earth a true brotherhood of man.

Stoen remembers when he was first appointed director of the Legal Services Foundation here and had no money available to clean up the offices allotted him and how he appealed to Jim and the next day 25 members of the church turned up with mops, brooms, paint brushes and sheer will to put the place in order.

He knows of the families in need who did not qualify for any assistance due to bureaucratic regulations and to whom Jim Jones held out his hand and opened up his wallet.

Stoen firmly believes that the senseless persecution Jim

and his family and parishioners suffered in Redwood Valley was the catalyst which, in the end, brought a great and heroic man down to the lowest common denominator of mankind and destroyed forever a cherished dream of peace on earth and love for one's brother.



REV. JIM JONES  
Claims he's the father

But, Stoen says with a fervor which cannot be ignored:

"I love my son so much I am willing to go through whatever humiliation Jim puts me through to get my son back. I just wish Jim to get well and I don't wish any harm to him but I will do everything in my power that is ethical to ensure his return to me and to Grace."

Despite Stoen's turning of the other cheek in the best Christian tradition, his humanness as a man who feels he has been betrayed by one he trusted and for whom he gave up his former rather "posh" way of living, complete with Porsche and the wardrobe and female companionship to go along with it, one cannot help but detect that, despite his protestations, he is a bitter, completely disillusioned man who will stop at nothing to regain the child he says is his and revenge himself upon the man he has come to consider as having feet of clay — and a very poor grade of clay, at that.

He bitterly regrets what he terms "the neglect of my wife" for the church and the man to whom he had given his complete devotion — only to lose all he held dear. "I

neglected my wife although I loved her dearly — I neglected her."

He tells of his wife's return to Jim Jones and her demand for the return of her son.



TIM STOEN  
Tug-of-war over child

He tells of his deep love for her and of his hopes that sometime in the future, God and the fates willing, that she and the child he firmly believes is his, will be reunited in a normal family relationship.

He tells, almost proudly of how his wife faced Jim Jones and told him what she thought of what he had become and demanded the return of her son.

"She really told him off," Stoen said. "She told him he had become too hard on his people, that he was not making them happy and that he had lost his kindness which drew so many people to him in the first place."

Stoen said Jones was "very angry" with her for facing him down and said the pastor was actually an atheist — that he came to believe at the end that "there couldn't be any other God than him."

He acknowledged that he had seen what he considered true faith healing performed by Jones but accused Jones of coming to believe that he, not God, was responsible for the healing.

Stoen told of his fears for his life and that of his wife when they went to Guyana in an attempt to regain custody of John-John — of the threats that had been made and of the government's demand that they leave the country at once.

Stoen, a mild-mannered man to all who knew him, sent his wife to Trinidad for her own safety but refused to leave Guyana himself although "Jim has tremendous 'clout' there, for he has 'charismatic' personality and the government there had come completely under his spell, feeling that a man who could do what he did for their people in his agricultural venture, could do no wrong and anyone who tried to interfere with him or his work, would find himself on the next plane out of the country."

"Grace and I have already spent more than \$18,000 of our own money trying to get our son back," Stoen said, "but we're not giving up."

He spoke, almost casually of the death threats he had received and the threatening calls to his aging mother.

"Our present goal is to try to pay off our present debts and obtain more money to continue our fight to work our way out of this nightmare," and, he added.

"We do learn from our mistakes and this has been one very tough lesson."

## Group forms to protest

## Davis leads in

BB-31-b-100



ENDORSED-FILED

MAY 22 1978

VIOLA RICHARDSON  
MENDOCINO COUNTY CLERK

1 TIMOTHY OLIVER STOEN  
120 Montgomery Street, Suite 1700  
2 San Francisco, California 94104  
Telephone: (415) 391-5020  
3 Attorney for Plaintiff  
4  
5  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE COUNTY OF MENDOCINO

10 STEVEN A. KATSARIS,  
11 Plaintiff,

12 v.

13 JAMES WARREN JONES, also known as  
JIM JONES; SANDRA BRADSHAW, also  
14 known as SANDRA INGRAM; PEOPLES  
TEMPLE OF THE DISCIPLES OF CHRIST,  
15 a nonprofit corporation; PAULA  
ADAMS; and FIRST DOE through  
16 FIFTIETH DOE, inclusive,  
17 Defendants.

No. 39911

AMENDED COMPLAINT FOR COM-  
PENSATORY AND PUNITIVE  
DAMAGES FOR LIBEL ON ITS  
FACE AND FOR SLANDER PER  
SE

18  
19 Plaintiff alleges:

20 FIRST CAUSE OF ACTION

- 21 1. Plaintiff is informed and believes and thereon alleges that  
22 Defendant SANDRA BRADSHAW, also known as SANDRA INGRAM, is and at  
23 times herein mentioned was a resident of Mendocino County, California  
24 2. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST was an  
25 is a nonprofit corporation organized and existing under and by virtue  
26 of the laws of the State of California.

BB-31-6-101

EXHIBIT E

FILED

JUN 7 1978

John J. Corcoran, County Clerk

M Medlock  
BY M. MEDLOCK, DEPUTY

1 TIMOTHY OLIVER STOEN  
2 120 Montgomery Street, Suite 1700  
3 San Francisco, California 94104  
4 Telephone: (415) 391-5020  
5 Attorney for Plaintiffs

6  
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CCP  
P

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES

10 WADE B. MEDLOCK and MABEL M.  
11 MEDLOCK, husband and wife,  
12 Plaintiffs,

No. 243232

vs.

13 JAMES WARREN JONES, also known  
14 as JIM JONES; PEOPLES TEMPLE  
15 OF THE DISCIPLES OF CHRIST, a  
16 nonprofit corporation; ENOLA M.  
17 NELSON; ENOLA M. NELSON REALTY;  
18 HUGH FORTSYN; JAMES McELVANE;  
19 and FIRST DOE through FIFTIETH  
20 DOE, inclusive,  
21 Defendants.

COMPLAINT FOR COMPENSATORY  
AND PUNITIVE DAMAGES FOR  
CONVERSION BASED ON COERCION  
AND FOR INTENTIONAL INFLIC-  
TION OF EMOTIONAL DISTRESS

Plaintiffs allege:

FIRST CAUSE OF ACTION

1. Plaintiffs are informed and believe and thereon allege that  
defendant JAMES McELVANE is, and at all times herein mentioned was,  
a resident of the County of Los Angeles, State of California.

2. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST ("PEOPLES  
TEMPLE") is, and at all times herein mentioned was, a nonprofit cor-

BB-31-6-102

EXHIBIT F 7 -

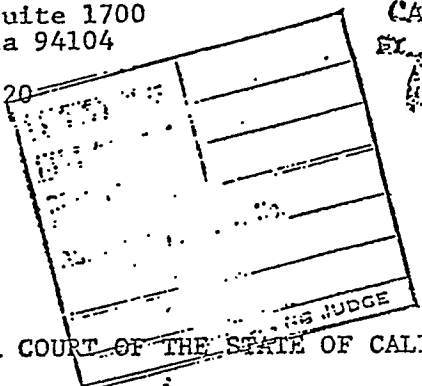
FILED

San Francisco County Superior Court

JUN 22 1978

CARE M. OLSEN, Clerk

1 TIMOTHY OLIVER STOEN  
120 Montgomery Street, Suite 1700  
2 San Francisco, California 94104  
3 Telephone: (415) 391-5020  
4 Attorney for Plaintiff



5  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10 JAMES COBB, JR.,  
11 Plaintiff,

No. 739907

12 vs.

13 PEOPLES TEMPLE OF THE DISCIPLES  
OF CHRIST, a nonprofit corpora-  
14 tion; JAMES WARREN JONES, also  
known as JIM JONES; TERESA BU-  
15 FORD; JEAN F. BROWN; PAMELA G.  
MOTON; and FIRST DOE through  
16 FIFTIETH DOE, inclusive,  
17 Defendants.

COMPLAINT FOR COMPENSATORY AND  
PUNITIVE DAMAGES FOR INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS  
AND FOR LIBEL ON ITS FACE

18

19 Plaintiff alleges:

20 FIRST CAUSE OF ACTION

21 1. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST ("PEOPLES  
22 TEMPLE") is, and at all times herein mentioned was, a nonprofit cor-  
23 poration organized and existing under and by virtue of the law of the  
24 State of California. Plaintiff is informed and believes and thereon  
25 alleges that the principal place of business of defendant PEOPLES  
26 TEMPLE is at 1859 Geary Boulevard in the City and County of San Fran-

BB-31-6-103

EXHIBIT G

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VERIFICATION

I, CAROL STAHL am  
President of plaintiff PEOPLES TEMPLE, a nonprofit corporation, in the  
above entitled action.

I have read the foregoing Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctions; and Damages; Memorandum of Points and Authorities; and Declaration in Support of Complaint and know the contents thereof; and the same is true of my own knowledge, except as to the matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I declare under penalty of perjury the foregoing is true and correct. Executed on July \_\_, 1978 at San Francisco, California.

*Carol Stahl*  
CAROL STAHL

BB- 31- b -104

GARRY, DREYFUS, McTERNAN, BROTSKY,  
HERNDON & PESONEN, INC.  
1256 MARKET STREET AT CIVIC CENTER  
SAN FRANCISCO, CALIFORNIA 94102  
TEL: 864-3111

1 PATRICK SANSFIELD HALLINAN  
Hallinan & Blum  
2 345 Franklin Street  
San Francisco, California 94102  
3  
4 Telephone: (415) 861-1151  
5 Attorney for Defendant  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10	PEOPLES TEMPLE OF THE DISCIPLES )	
	OF CHRIST, a nonprofit corporation,) )	
11	JEAN BROWN, and JAMES McELVANE, )	NO. 740531
	)	
12	Plaintiffs, )	
	)	DECLARATION BY WADE B.
13	v. )	MEDLOCK AND MABEL M. MEDLOCK
	)	OPPOSING APPLICATION FOR
14	TIMOTHY OLIVER STOEN, )	PRELIMINARY INJUNCTION
	)	
15	Defendant. )	
	)	
16	_____ )	

17 We, Wade B. Medlock and Mabel M. Medlock, husband and  
18 wife, hereby declare as follows:

- 19 1. We are the plaintiffs in a lawsuit entitled WADE B. .  
20 MEDLOCK and MABEL M. MEDLOCK vs. JAMES WARREN JONES, PEOPLES TEMPLE,  
21 JAMES McELVANE, et al, filed on June 7, 1978, in the Superior  
22 Court for the County of Los Angeles, Civil Case No. C243292. A  
23 copy of the complaint is attached and made a part hereof. Our  
24 attorney is Timothy Oliver Stoen.
- 25 2. This declaration is made in opposition to plaintiff's  
26 application for a preliminary injunction. We are requesting that

-188-31-b-105

1 Timothy Oliver Stoen be allowed to remain our attorney and help  
2 us get back the money stolen from us by PEOPLES TEMPLE.

3 3. I, Wade B. Medlock, am 71 years old. I, Mabel M. Medlock,  
4 am 67 years of age. For 33 years we worked together in our own  
5 maintenance business in Los Angeles to acquire equity in two  
6 pieces of property as security for our senior years. In February  
7 1977, our pastor, Jim Jones, called us into the "council room"  
8 of the PEOPLES TEMPLE church in Los Angeles and showed us some  
9 papers already filled out. We knew that they were for the sale  
10 of our properties, and we did not want to sign. When we hesitated,  
11 Jim Jones said to us personally, in front of a number of other  
12 people in the room, that if we didn't sign those papers immediately  
13 we would "die". We took this as a serious threat we would be  
14 killed, and we therefore signed against our will. When the  
15 escrow closed in August 1977, we were given \$7,000.00 and PEOPLES  
16 TEMPLE took more than \$48,000.00. (Both properties had been sold  
17 at prices far below fair market value.) We were heartsick but were  
18 afraid for our lives to complain to anyone. Jim Jones then started  
19 putting a lot of pressure on us to go to Guyana, where a number  
20 of our relatives are. But we did not want to live in any jungle,  
21 so we kept refusing.

22 4. Members of PEOPLES TEMPLE kept coming to us and asking  
23 us why we did not go to Guyana. In January 1978, an associate  
24 PEOPLES TEMPLE minister, Hugh Fortsyn, threatened both of us with  
25 the same fate (murder) as had happened to Christopher Lewis. On  
26 Easter Sunday of this year JAMES McELVANE threatened that we

1 had better watch out because "what happened to Chris could happen  
2 to you."

3 5. On April 25, 1978, ex-members of PEOPLES TEMPLE held a  
4 meeting of "Concerned Relatives" at a baptist church in Los  
5 Angeles. At the meeting we told the people what PEOPLES TEMPLE  
6 and Jim Jones had done to us. Afterwards Steve Katsaris said we  
7 should sue the church, and he told us to talk to Tim Stoen. Tim  
8 Stoen said to call him the next day, which we did. On April 26  
9 we took the papers we had gotten from the escrow company to Tim  
10 Stoen to look at. He said we had been "extorted" and that we  
11 had a good case against PEOPLES TEMPLE but that they would  
12 probably try to sell all their property before we got a judgment.  
13 But since we don't have enough to live on, we are not going to  
14 give up.

15 6. We asked Tim Stoen not to file the lawsuit until we  
16 could move to safer living quarters. We were in constant fear  
17 that PEOPLES TEMPLE would send someone into our apartment at  
18 night and stab us. When we moved in May, we told Tim Stoen to  
19 file the lawsuit, which he did. Since then we have not received  
20 any more threats from PEOPLES TEMPLE.

21 7. Tim Stoen never talked with us about selling our  
22 property or turning it over to PEOPLES TEMPLE. He very seldom  
23 came to Los Angeles. He had nothing to do with our transferring  
24 it to the church. We did not even see him from September 1976  
25 until the meeting in April 1978.

26 8. Tim Stoen never asked us to sue PEOPLES TEMPLE or JAMES

1 MCELVANE. We asked him to do it for us. We are very glad he  
2 did. We do not want him taken off our case.

3 9. We authorize Tim Stoen to disclose all of the  
4 information we have given him regarding our lawsuit.

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VERIFICATION

I, the undersigned, say:

I am a declarant in this action;  
~~XXXXXXXXXXXXXXXXXXXXXXXXXXXX~~ the above document is true  
of my own knowledge, except as to the matters that are stated in  
it on my information and belief, as as to those matters, I believe  
them to be true.

Executed on July 24, 1978, at \_\_\_\_\_  
Los Angeles, California.

I declare under penalty of perjury that the above is  
true and correct.

Waide B. Medlock  
WAIDE B. MEDLOCK

Mabel M. Medlock  
MABEL M. MEDLOCK

BB-31-b-109

1 PATRICK SANSFIELD HALLINAN  
Hallinan & Blum  
2 345 Franklin Street  
San Francisco, California 94102  
3 Telephone: (415) 861-1151  
4 Attorney for Defendant  
5  
6  
7

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10	PEOPLES TEMPLE OF THE DISCIPLES	)	
	OF CHRIST, a nonprofit corporation,	)	
11	JEAN BROWN, and JAMES McELVANE,	)	NO. 740531
		)	
12	Plaintiffs,	)	DECLARATION BY JAMES COBB, JR.
		)	OPPOSING APPLICATION FOR
13	v.	)	PRELIMINARY INJUNCTION
		)	
14	TIMOTHY OLIVER STOEN,	)	
		)	
15	Defendant.	)	
		)	

16  
17 I, James Cobb, Jr., declare:

18 1. I am the plaintiff in a lawsuit entitled COBB vs.  
19 PEOPLES TEMPLE, JAMES WARREN JONES, JEAN F. BROWN, et al,  
20 filed on June 22, 1978, in the Superior Court for the City  
21 and County of San Francisco, Civil Case No. 739907. A copy  
22 of the complaint is attached and made a part hereof. My  
23 attorney is Timothy Oliver Stoen.

24 2. This declaration is made in opposition to plaintiff's  
25 application for a preliminary injunction. I am requesting that  
26 Timothy Oliver Stoen, the defendant in this action, be allowed

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-1- BB-31-b-110

1 to remain as my attorney and to push my lawsuit.

2 3. On May 11, 1978, Mr. Stoen and I were attending a  
3 dinner at a friend's house in San Francisco. At the dinner I  
4 brought up the subject of an open letter on PEOPLES TEMPLE  
5 stationery that had come to my attention. It was dated  
6 March 14, 1978 and was addressed to "All U.S. Senators and  
7 Members of Congress". It falsely accused me of being a  
8 "radical Trotskyite" who recommended a "violent course."  
9 (A copy of this letter is an exhibit in the attached complaint)  
10 I told Mr. Stoen that this ridiculous letter was the last straw,  
11 and asked him if he would file a lawsuit against PEOPLES TEMPLE  
12 and Jim Jones.

13 4. Shortly after quitting PEOPLES TEMPLE in 1973, I began  
14 being harrassed by them. Ever since, I have thought it only a  
15 matter of time (maybe tomorrow) that I would be killed by them.  
16 When the situation presented itself last summer, I engaged in  
17 exposing Jim Jones and his evil practices in PEOPLES TEMPLE. I  
18 have considered taking legal action against Jones many times  
19 before, but it was not until March of 1977 that I felt to seek an  
20 attorney.

21 5. A few days after our dinner conversation of May 11, 1978,  
22 I visited Mr. Stoen at his office on Montgomery Street and brought  
23 with me a list of things that PEOPLES TMEPLE and Jim Jones had  
24 done to me since 1973. Mr. Stoen agreed to be my attorney.

25 6. During all this time from 1973 until now, I have been  
26 having trouble concentrating in dental school because of the threats

1 which are mentioned in my lawsuit. The thing that has bothered  
2 me the most was the threat that my son would be harmed if I  
3 didn't stop "badmouthing" PEOPLES TEMPLE.

4 7. Mr. Stoen never approached me at any time to be my  
5 attorney. He did not in any way solicit my case. I feel much  
6 better now that I am exposing Jim Jones and PEOPLES TEMPLE in  
7 the courts. I think one reason Jones has gotten away with so  
8 much is that people abused by him, did not sue him earlier. No  
9 further libels on me by PEOPLES TEMPLE have come to my attention  
10 since I filed my lawsuit.

11 8. I consent to Mr. Stoen disclosing to anyone all of  
12 the circumstances by which I asked him to be my attorney. I  
13 consent to his disclosing any and all of the information about my  
14 lawsuit that has come to his attention from anyone, including me.

15 It would be difficult for me to find another trial attorney as  
16 competent as Tim Stoen, particularly with experience equivalent  
17 to his as special prosecutor in San Francisco.

18 I declare under penalty of perjury that the foregoing  
19 is true and correct.

20 Executed on July 30, 1978, at Berkeley, California.

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*James Cobb, Jr.*  
\_\_\_\_\_  
JAMES COBB, JR.

BB-31-6-112

Also attached to declaration of James Cobb,  
as exhibits, which I didn't copy because too bulky and  
we already have them anyway:

1. the full complaint of James Cobb and all of his  
exhibits that he originally had on his complaint

BB-31-6-113

1 TIMOTHY OLIVER STOEN  
120 Montgomery Street, Suite 1700  
2 San Francisco, California 94104  
3 Telephone: (415) 391-5020  
4 Attorney for Plaintiff

ENDORSED  
**FILED**  
JUN 22 1978

CARL M. OLSEN, Clerk  
BY P. W. MURPHY  
Deputy Clerk

739907

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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO  
10 JAMES COBB, JR.,

11 Plaintiff,

12 vs.

13 PEOPLES TEMPLE OF THE DISCIPLES  
OF CHRIST, a nonprofit corpora-  
14 tion; JAMES WARREN JONES, also  
known as JIM JONES; TERESA BU-  
15 FORD; JEAN F. BROWN; PAMELA G.  
MOTON; and FIRST DOE through  
16 FIFTIETH DOE, inclusive,

17 Defendants.

No. 1

COMPLAINT FOR COMPENSATORY AND  
PUNITIVE DAMAGES FOR INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS  
AND FOR LIBEL ON ITS FACE

18  
19 Plaintiff alleges:

20 FIRST CAUSE OF ACTION

21 1. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST ("PEOPLES  
22 TEMPLE") is, and at all times herein mentioned was, a nonprofit cor-  
23 poration organized and existing under and by virtue of the law of the  
24 State of California. Plaintiff is informed and believes and thereon  
25 alleges that the principal place of business of defendant PEOPLES  
26 TEMPLE is at 1859 Geary Boulevard in the City and County of San Fran-

BB-31-6-114

Jim,

If you think that you are working only to destroy our friend, you're badly underestimating the course you are on. This is going down on the record as a deliberate attempt to starve out hundreds of good people. You'll be remembered for much more than just a personal vendetta.

Even though what you're trying to do is impossible, you're going to earn for yourselves the bitterest of enemies. We have solid evidence that one of your crowd participated in Chris' death. A whole lot of people not even associated with us can back that up. Whether or not you decide to respond to this hardly matters now. Since you are no doubt fully aware of who you're in with and what you are working for, I count this communication probably a waste of my time. We have real class enemies to deal with, and really aren't worrying about your clumsy efforts. But in the future, don't try to say you didn't know. It won't wash. If you had cared anything about what was right, you would have checked with the officials that live there and have seen the work, and asked them about the kind of society we're building there. But like I said; in the future, don't plead ignorance.

EXHIBIT A

BB-31-6-115



Jim Cobl  
103<sup>rd</sup> Cole St. Apt. A  
San Francisco, CA

EXHIBIT A1

BB-31-b-116



1 PATRICK SANSFIELD HALLINAN  
2 Hallinan & Blum  
3 345 Franklin Street  
4 San Francisco, California 94102  
5 Telephone: (415) 861-1151  
6 Attorney for Defendant

7  
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10 PEOPLES TEMPLE OF THE DISCIPLES )  
11 OF CHRIST, a nonprofit corporation, )  
12 JEAN BROWN, and JAMES McELVANE, ) NO. 740531  
13 Plaintiffs, ) DECLARATION BY STEVEN A.  
14 v. ) KATSARIS OPPOSING APPLICATION  
15 TIMOTHY OLIVER STOEN, ) FOR PRELIMINARY INJUNCTION  
16 Defendant. )

17 I, Steven A. Katsaris, declare:

18 1. I am the plaintiff in a lawsuit entitled KATSARIS vs.  
19 JONES, PEOPLES TEMPLE, et al, filed on May 16, 1978, in the  
20 Superior Court for the County of Mendocino, Civil Case No. 39911.  
21 A copy of the amended complaint (filed May 22, 1978) is attached  
22 and made a part hereof. My attorney is Timothy Oliver Stoen.  
23 2. This declaration is made in opposition to plaintiff's  
24 application for a preliminary injunction. I am requesting that  
25 Timothy Oliver Stoen, the defendant in the within action, be  
26 allowed to remain as attorney of record on my behalf and to

BB-31-6-117

1 prosecute my lawsuit through to its conclusion.

2 3. I have known Timothy Oliver Stoen since 1972, when he  
3 was an assistant district attorney in Mendocino County, where  
4 I work and reside. As the Director of Trinity School for  
5 Children in the small community of Ukiah, California, I am  
6 regularly brought into contact with attorneys, law enforcement  
7 officials, and others in civic leadership capacities. Even  
8 before I met Mr. Stoen, I had heard of him and knew he enjoyed  
9 the respect and esteem of the community leaders as a very  
10 capable, effective, and decisive attorney.

11 4. On April 11, 1978, I was the spokesman for a group of  
12 "Concerned Relatives" and delivered to PEOPLES TEMPLE  
13 representatives in San Francisco a document entitled, "Accusation  
14 of Human Rights Violations by Rev. James Warren Jones Against  
15 Our Children and Relatives at the Peoples Temple Jungle Encamp-  
16 ment in Guyana, South America." On the following day an article  
17 appeared in the "Santa Rosa Press Democrat" newspaper quoting a  
18 representative of PEOPLES TEMPLE, Sandra Ingram, as stating that  
19 I was a child molester. This was the second instance where PEOPLES  
20 TEMPLE representatives had publicly defamed me with this totally  
21 false charge. I was determined to expose their vicious and  
22 unfounded attacks, which in my opinion were designed to intimidate  
23 me into silence concerning the true nature of their organization.

24 5. The expenses of maintaining two of my children in college,  
25 Elaine at Stanford and Anthony at the University of California,  
26 Chico, along with the large sums I had already spent on two trips

1 to Guyana attempting to help my daughter, Maria, made me  
2 apprehensive about the legal costs involved in seeking legal  
3 recourse against the attacks on my reputation. I was then,  
4 and am now, worried about the irreparable damage such charges  
5 could do to a man whose life is devoted to helping children.

6 6. I decided to approach Tim Stoen with my dilemma and  
7 ask him to represent me. I explained to him my plans to  
8 voluntarily submit to a lie detector test so that he and others  
9 would have no doubt concerning the truth of my innocence. I asked  
10 him to represent me on a contingency basis, explaining that I  
11 had few funds left for legal costs. I also told him I had  
12 confidence he was an aggressive and extremely capable attorney  
13 who would act with dispatch. I also explained to him that I had  
14 seen his professional resume (attached as Exhibit A), his  
15 character references (attached as Exhibit B) and the Board of  
16 Supervisors resolution commending him (attached as Exhibit C).

17 7. When I met with Mr. Stoen at his office in San Francisco  
18 on April 21, 1978, I told him I wanted to proceed immediately.  
19 Many of the people I work with professionally had read the "Press  
20 Democrat" article, and I told Mr. Stoen I needed to respond without  
21 delay with a lawsuit to bring PEOPLES TEMPLE to justice. We looked  
22 in the telephone book yellow pages for the most reputable appearing  
23 polygraph firm. We set up an appointment with George Harmon,  
24 and I followed up with a letter written on my initiative to  
25 Mr. Harmon, a copy of which is attached hereto as Exhibit D and  
26 made a part hereof. I took the lie detector test on May 2, 1978.

1 On May 3, 1978, Mr. Harmon issued his report saying I was  
2 "telling the truth". That report is part of my lawsuit  
3 attached hereto.

4 8. On April 25, 1978, ex-members of PEOPLES TEMPLE held a  
5 "Concerned Relatives" meeting in Los Angeles at the Saint James  
6 Missionary Baptist Church. At the meeting were Wade and Mabel  
7 Medlock, who told us that PEOPLES TEMPLE had taken all of their  
8 property from them by means of threats made by Jim Jones  
9 personally that they would be killed. I was so upset after  
10 hearing their story that I went up to them at the end of the  
11 meeting and asked them to consider filing a suit, suggesting  
12 they talk to Tim Stoen. It was after this that they first  
13 contacted him about their case. I did, however, ask Mr. Stoen  
14 to put my case first because of the urgency of the situation  
15 regarding my reputation.

16 9. The purpose of this declaration is to state categorically  
17 that Mr. Stoen's involvement in my lawsuit originated with me,  
18 and that I am represented by Mr. Stoen at my request. He never  
19 solicited my case in any way. I believe my interests would be  
20 gravely comprised if he were not my attorney.

21 10. I hereby consent to Mr. Stoen disclosing all of the  
22 circumstances whereby he became by attorney and all of the  
23 information I have given him.  
24  
25  
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1  
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3 VERIFICATION

4 I, the undersigned, say:  
5 I am a declarant in this action;  
6 ~~XXXXXXXXXXXXXXXXXXXX~~ the above document is true  
7 of my own knowledge, except as to the matters that are stated in  
8 it on my information and belief, as as to those matters, I believe  
9 them to be true.

10 Executed on July 29, 1978, at San  
11 Francisco, California.

12 I declare under penalty of perjury that the above is  
13 true and correct.

14  
15 Shirley A. Katsaris  
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26

1 PATRICK SANSFIELD HALLINAN  
2 Hallinan & Blum  
3 345 Franklin Street  
4 San Francisco, California 94102

5 Telephone: (415) 861-1151.

6 Attorney for Defendant

7  
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10 PEOPLES TEMPLE OF THE DISCIPLES )  
11 OF CHRIST, a nonprofit corporation,) NO. 740531  
12 JEAN BROWN, and JAMES McELVANE, )

13 Plaintiffs, )

14 v. )

15 TIMOTHY OLIVER STOEN, )

16 Defendant. )

DECLARATION BY DEFENDANT  
OPPOSING APPLICATION FOR  
PRELIMINARY INJUNCTION

(CCP § 527)

17 I, Timothy Oliver Stoen, declare:

18 1. I am the defendant herein. This declaration is made in  
19 opposition to plaintiffs' application for a preliminary injunction.

20 2. Incorporated herein by reference are the following  
21 verified pleadings filed in this action on behalf of defendant:

22 a. Answer to Complaint;

23 b. Declaration by Steven A. Katsaris, Opposing Application  
24 for Preliminary Injunction ("Katsaris Declaration");

25 c. Declaration of Wade B. Medlock and Mabel M. Medlock,  
26 Opposing Application for Preliminary Injunction ("Medlock  
Declaration");

-1- BB-31-6-122

1 d. Declaration of James Cobb, Jr., Opposing Application  
2 of Preliminary Injunction ("Cobb Declaration").

3 3. I am an attorney admitted to practice law in the State  
4 of California.

5 4. As an attorney having a public trust, I am well aware  
6 of the rule pertaining to representation adverse to a former  
7 client. This rule has been stated by the California Supreme  
8 Court as follows:

9 The fact that an attorney has once acted in a  
10 professional capacity for a person does not  
11 preclude him from thereafter accepting a  
12 retainer to act adversely to his former client  
13 in a matter which has no reference to his  
14 previous employment \*\*\*.

15 Wutchumna Water Co. v. Bailey (1932) 216 C. 564,  
16 571, 15 P.2d 505.

17 5. As an attorney I am well aware of another serious  
18 obligation, i.e., to represent "the cause of the defenseless or  
19 the oppressed." The California legislature, in enacting  
20 Section 6068 (h) of the California Business and Professions Code,  
21 made this an express duty:

22 It is the duty of an attorney:

23 (h) Never to reject, for any consideration  
24 personal to himself, the cause of the  
25 defenseless or the oppressed.

26 6. James Warren Jones, also known as Jim Jones, is a  
necessary witness in these proceedings. Jim Jones was the  
president of plaintiff PEOPLES TEMPLE, and kept himself totally  
aware of all its business, until leaving the United States for  
Guyana in June 1977. Aside from me, only he was in a position to

1 know whether I ever acquired, in any legal capacity or in any  
2 other capacity, any "confidential" or "secret" information  
3 connected with the subject matters of the three lawsuits mentioned  
4 in the complaint herein as filed by me. If Jim Jones were called  
5 to testify, and did so truthfully, he would testify that I was  
6 never consulted by PEOPLES TEMPLE on any subject matter connected  
7 with the aforesaid lawsuits, and that I never acquired, in any  
8 legal capacity or in any other capacity, from PEOPLES TEMPLE, or  
9 any authorized member thereof, any "confidential" or "secret"  
10 information connected with the aforesaid lawsuits. He would also  
11 testify that from September 5, 1976, until the present time I  
12 was never appointed, retained, or used as "counsel" for  
13 PEOPLES TEMPLE on any matter. He would also testify that I have  
14 never been retained or appointed as general counsel for PEOPLES  
15 TEMPLE even though, pursuant to a general requirement of PEOPLES  
16 TEMPLE, I donated my legal talents free of charge on routine  
17 matters, as a member of PEOPLES TEMPLE and not in an attorney-  
18 client capacity. He would also testify that from March 2, 1970,  
19 when I joined PEOPLES TEMPLE, until February, 1977, I had a  
20 full-time job as an assistant district attorney.

21 7. On June 12, 1977, I terminated all communication with  
22 plaintiff PEOPLES TEMPLE and its members. Since that date I  
23 have not visited or set foot in any PEOPLES TEMPLE building or  
24 facility. Since that date I have not had any consultations with,  
25 nor given any advice to (except to demand the return of my son),  
26 nor received any information from (except to receive threats),



1 plaintiffs PEOPLES TEMPLE or BROWN or McELVANE or any other  
2 member of PEOPLES TEMPLE.

3 8. In April and May of this year, 1978, I was approached  
4 by four oppressed victims of illegal and savage practices of  
5 plaintiffs PEOPLES TEMPLE, BROWN, and McELVANE. These victims  
6 were: Steven A. Katsaris, Wade B. Medlock, Mabel M. Medlock,  
7 and James Cobb, Jr. I did not in any way "solicit" any  
8 business or employment from any of them. I did not accept  
9 employment from them "out of spite" or any personal vendetta.  
10 Rather, upon being asked by each of these victims to file a  
11 lawsuit on his or her behalf, I researched each matter carefully  
12 and concluded that each had been greatly wronged, that the  
13 liabilities of PEOPLES TEMPLE, BROWN, and McELVANE were clear  
14 beyond all reasonable doubt, and that the only question for a  
15 trier of fact was the amount of damages suffered. Accordingly, I  
16 thereupon filed the following three complaints, each of them  
17 verified by plaintiffs under penalty of perjury:

18 a. STEVEN A. KATSARIS vs. JAMES WARREN JONES, PEOPLES TEMPLE  
19 OF THE DISCIPLES OF CHRIST, et al ("Katsaris lawsuit"); filed  
20 on May 16, 1978, in the Superior Court for the County of Mendocino,  
21 Civil Case No. 39911;

22 b. WADE B. MEDLOCK and MABEL M. MEDLOCK, husband and wife,  
23 vs. JAMES WARREN JONES, PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST,  
24 JAMES McELVANE, et al ("Medlock lawsuit"); filed on June 7, 1978,  
25 in the Superior Court for the County of Los Angeles, Civil Case  
26 No. C243292; and

1 c. JAMES COBB, JR., vs. PEOPLES TEMPLE OF THE DISCIPLES  
2 OF CHRIST, JAMES WARREN JONES, JEAN F. BROWN, et al ("Cobb  
3 lawsuit"); filed on June 22, 1978, in the Superior Court for  
4 the City and County of San Francisco, Civil Case No. 739907.

5 A copy of the Katsaris lawsuit is attached to the Katsaris  
6 declaration. A copy of the Medlock lawsuit is attached to the  
7 Medlock declaration. A copy of the Cobb lawsuit is attached to  
8 the Cobb declaration.

9 9. I did not in any way use any "confidential" or "secret"  
10 information acquired from PEOPLES TEMPLE or any member thereof  
11 in preparing or filing any of the aforementioned lawsuits, nor  
12 will I be "called upon" to do so. This is clear from the Katsaris  
13 declaration, the Medlock declaration, the Cobb declaration, and  
14 an analysis of the dates alleged in the complaints for the unlawful  
15 acts of PEOPLES TEMPLE.

16 10. In the Katsaris lawsuit, the dates alleged for the  
17 unlawful acts of PEOPLES TEMPLE are:

18 First Cause of Action (Libel): May 10, 1978;

19 Second Cause of Action (Libel): April 12, 1978; and

20 Third Cause of Action (Slander): September 20, 1977.

21 11. In the Medlock lawsuit, the dates alleged for the  
22 unlawful acts of PEOPLES TEMPLE and McELVANE are:

23 First Cause of Action (Conversion/Extortion): February  
24 13, 1977;

25 Second Cause of Action (Intentional Infliction of  
26 Emotional Distress): January 20, 1978; and

1 Third Cause of Action (Intentional Infliction of Emotional  
2 Distress): March 26, 1978.

3 12. In the Cobb lawsuit, the dates alleged for the unlawful  
4 acts of PEOPLES TEMPLE and BROWN are:

5 First Cause of Action (Intentional Infliction of  
6 Emotional Distress): March 14, 1978;

7 Second Cause of Action (Intentional Infliction of  
8 Emotional Distress): March 14, 1978 and April 18, 1978;

9 Third Cause of Action (Libel): March 14, 1978;

10 Fourth Cause of Action (Libel): May 10, 1978; and

11 Fifth Cause of Action (Libel): May 15, 1978.

12 13. An analysis of the dates of the respective causes of  
13 action show, then, that all except one occurred long after I  
14 severed my relationship to PEOPLES TEMPLE on June 12, 1977. The  
15 only exception is the act of conversion and extortion alleged  
16 by Wade and Mabel Medlock to have occurred on February 13, 1977,  
17 in Los Angeles, California. The truth is that I never consulted  
18 at any time with the Medlocks about the transfer of their  
19 properties to PEOPLES TEMPLE or anyone else. The truth is that I  
20 have never consulted with PEOPLES TEMPLE, BROWN, McELVANE, or any  
21 other member of PEOPLES TEMPLE about the transfer of the Medlock's  
22 properties. I never saw or talked with either Wade Medlock or  
23 Mabel Medlock from September 5, 1976 (the last meeting of PEOPLES  
24 TEMPLE I ever attended in the United States and the last time I

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26 ---

1 visited PEOPLES TEMPLE in Los Angeles) until seeing them at a  
2 meeting of "Concerned Relatives" in Los Angeles on April 25, 1978.

3 14. The complaint for injunction herein alleges specific  
4 facts of misuse of confidential information solely with respect  
5 to the Katsaris lawsuit. (As the points and authorities make clear  
6 the failure of plaintiffs to allege specific facts as to the  
7 Medlock lawsuit and the Cobb lawsuit means no injunction may  
8 legally issue as to them.) Declarant hereby refers to the  
9 answer to complaint, which shows that the allegations of  
10 paragraph VI of the complaint are totally false, perjured, and  
11 verified by a person in no position to know their truth or  
12 falsity.

13 15. Maria Katsaris, a member of PEOPLES TEMPLE, is a  
14 necessary witness in these proceedings. Aside from me, only she  
15 is in a position to know whether I advised her "in April or May,  
16 1977" that she "should go to Guyana to avoid the possibility of her  
17 father's instituting conservatorship proceedings against her."  
18 Aside from me, only she is in a position to know whether in  
19 consultations with her I "obtained confidential information  
20 concerning her relationship with her father ... and certain sexual  
21 advances made by her father towards her when she was a child."  
22 These terribly serious charges constitute the only possible basis  
23 in the entire complaint for the issuance of an injunction, and  
24 ought not to be decided on the basis of hearsay, which is all  
25 Carol Stahl, as verifier of the complaint, had at best available  
26 to her.

1           If Maria Katsaris were called to testify, and did so  
2 truthfully, she would testify as follows: that I have not seen,  
3 consulted, or advised Maria Katsaris since leaving the United  
4 States on February 16, 1977; that she never mentioned to me ever  
5 any charge that her father molested her; that she and I never  
6 discussed conservatorships; that she was in the United States  
7 during all of April and May, 1977 (while I was out of the United  
8 States during all that time).

9           16. Plaintiffs have included as Exhibit C-2 a so-called  
10 affidavit (unnotarized) signed by me which alleges that I was  
11 "unable" to sire a child and asked James Warren Jones to do so.  
12 Plaintiffs know that this document is totally false and spurious.  
13 (See birth certificate attached as Exhibit A; delivery room  
14 admission approval form attached as Exhibit B; urologist report  
15 attached as Exhibit C). Plaintiffs also know that this document  
16 is totally devoid of legal significance and that it could not be  
17 introduced in either of two custody proceedings, involving the  
18 same child, John Victor Stoen, brought in California and Guyana,  
19 respectively. (In the California proceeding, both Jones and I  
20 were named as parties before the Superior Court for San Francisco,  
21 which issued its order on November 18, 1977, awarding me joint  
22 legal custody along with my wife.)

23           In 1972 I signed the document at Jones' request as an act of  
24 trust and as a deterrent to my embarrassing the PEOPLES TEMPLE  
25 cause should I ever defect. As an idealist, I then believed that  
26 PEOPLES TEMPLE was the most promising organization to bring about

1 a utopian society. As a lawyer, I was well aware that there would  
2 be no legal effect to the document because it was signed after the  
3 birth of the child and because of the California law that a child  
4 born to husband and wife cohabiting together "is conclusively  
5 presumed to be a child of the marriage." California Evidence Code,  
6 §621; California Civil Code, §7004(a).

7 17. I left Georgetown, Guyana, on June 12, 1977, with the  
8 intention of returning in two to six weeks. I came to the United  
9 States to take a vacation and see my family and friends. In the  
10 first part of July I met with my estranged wife, Grace, and others  
11 who had left PEOPLES TEMPLE. They informed me of things that con-  
12 vinced me that Jim Jones had changed and was no longer the person  
13 I had previously esteemed. Shortly thereafter an article appeared  
14 in "New West" magazine criticizing the church and its practices.  
15 (A copy of this article is attached as Exhibit D and made a part  
16 hereof.) I realized the charges were substantially true and that  
17 I could no longer defend PEOPLES TEMPLE or Jim Jones. I also  
18 knew that my failure to defend the church would result in my  
19 being very much distrusted upon my return to Guyana. I realized  
20 that Jones was becoming increasingly ruthless and that it would be  
21 very difficult, maybe impossible, to go to Guyana and bring my son  
22 back safely.

23 My plan was to defend Jones and PEOPLES TEMPLE on individual  
24 points when I could in good conscience do so, which I did. (See  
25 Exhibit A of complaint.) I thought Jones would soon be returning  
26 to the United States from Guyana and that he would need my services

1 as an intermediary. I hoped he would see that I had remained  
2 loyal to the values (espoused by PEOPLES TEMPLE) of social justice,  
3 economic fairness, and racial brotherhood even though I was no  
4 longer a member. In return for my services and my remaining loyal  
5 to these values, Jones would, I thought, bring my son back without  
6 a court fight. Jones never returned.

7 In late October I decided I would have to fight Jones and  
8 PEOPLES TEMPLE in the courts to get my son. On November 18, 1977  
9 I testified accordingly in the above-mentioned action. Even before  
10 that, as soon as I had made it clear to Jones that I was taking  
11 this route, a number of harrassing events happened in my life,  
12 continuing up until the present, all of which I believe were caused  
13 by PEOPLES TEMPLE upon the instructions of Jim Jones.

14 I have not filed any lawsuit against plaintiffs because of any  
15 personal vendetta. I am, however, very much opposed to the practice  
16 of PEOPLES TEMPLE and Jim Jones. I believe that his members, inclu-  
17 ding BROWN and McELVANE, are "mind-programmed" by Jones. I believe  
18 that Jim Jones has lost the capacity for self-criticism. I believe  
19 that he is willing to murder all 1100 people now living under his  
20 dictatorial control in Jonestown, Guyana. I believe Jim Jones and  
21 PEOPLES TEMPLE do not respect human rights or individual rights of  
22 any type, but that the collective is all-important. I believe that  
23 Jim Jones has delusions of grandeur and has a totally irrational  
24 and paranoid fear that everyone is out to get him. I do not wish  
25 Jim Jones or PEOPLES TEMPLE destroyed. What I want with all my  
26 heart is the return of my beloved son, John Victor Stoen. Secondly

1 I want the 1100 people in Guyana living under the control of Jones  
2 to be given the choice to return home.

3 Notwithstanding my hatred for the practices of Jim Jones and  
4 PEOPLES TEMPLE, I have purposefully remained rational and nonvin-  
5 dictive. I am aware of two cardinal principles: (1) "That which  
6 goes around comes around", and (2) vindictiveness breeds counter-  
7 productive judgments. Therefore I am working through the Congress,  
8 the State Department, the Guyana courts, and the public to pressure  
9 Jones to return my son. I have no intention to file unmeritorious  
10 suits and thereby risk losing the momentum already established. In  
11 fact, I was at first reluctant to file any of these suits, but I  
12 did so recognizing my obligation as an attorney to defend the  
13 oppressed, and as a human being to expose wrongdoing.

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VERIFICATION

I, the undersigned, say:

I am a party to this action; the above document is true of my own knowledge, except as to the matters that are stated in it on my information and belief, as as to those matters, I believe them to be true.

Executed on August 3, 1978, at San Francisco, California.

I declare under penalty of perjury that the above is true and correct.

Timothy Oliver Stoen



WALTER C. CLOWERS, M.D.  
PUBLIC HEALTH OFFICER

SONOMA COUNTY  
PUBLIC HEALTH SERVICE

FEBRUARY 1, 1972

3313 CHANATE ROAD  
SANTA ROSA, CALIFORNIA 95404  
PHONE: 527-2605

**IMPORTANT NOTICE:** YOUR BABY'S BIRTH CERTIFICATE HAS BEEN FILED IN THIS OFFICE. THE INFORMATION BELOW IS A COPY OF PART OF THIS CERTIFICATE. IF THE INFORMATION SHOWN IS INCORRECT OR INCOMPLETE: PLEASE NOTIFY OUR VITAL STATISTICS SECTION WITHIN SEVEN DAYS OF ABOVE DATE. PHONE 527-2278.

Although this notice will not take the place of an official certified copy of the birth certificate, it may serve as a record for some purposes and should be preserved. An order form to use in ordering a certified copy is attached. There is a charge of \$2.00 for each certified copy.

In order to safeguard this birth record a permanent copy is kept in our records. The original certificate is sent to the State Registrar of Vital Statistics in Sacramento.

If you have any questions about these matters, I hope you will not hesitate to call upon us.

Very truly yours,

*Walter C. Clowers M.D.*

WALTER C. CLOWERS, M.D.  
Public Health Officer

CERTIFICATE OF LIVE BIRTH

4900-170

STATE 5714 CERTIFICATE NUMBER		STATE OF CALIFORNIA--DEPARTMENT OF PUBLIC HEALTH				LOCAL REGISTRATION DISTRICT AND CERTIFICATE NUMBER	
THIS CHILD	1a. NAME OF CHILD--FIRST NAME JOHN	1b. MIDDLE NAME VICTOR	1c. LAST NAME STOEN				
	2. SEX MALE	3a. THIS BIRTH, SINGLE, TWIN OR TRIPLE? SINGLE	3b. IF TWIN OR TRIPLE, THIS CHILD BIRTH 1ST, 2ND, 3RD? 1ST	4a. DATE OF BIRTH--MONTH, DAY, YEAR JANUARY 25, 1972	4b. HOUR 2:16PM		
PLACE OF BIRTH	5a. PLACE OF BIRTH--NAME OF HOSPITAL SANTA ROSA MEMORIAL HOSPITAL			5b. STREET ADDRESS (STREET AND NUMBER, OR LOCATION) 1165 MONTGOMERY DRIVE		5c. INSIDE CITY CORP. LIMITS? SPECIFY YES OR NO YES	
	5d. CITY OR TOWN SANTA ROSA			5e. COUNTY SONOMA			
MOTHER OF CHILD	6a. MAIDEN NAME OF MOTHER--FIRST NAME GRACE	6b. MIDDLE NAME LUCY	6c. LAST NAME (MAIDEN SURNAME) GRECH		7. BIRTHPLACE (STATE OR FOREIGN COUNTRY) SAN FRANCISCO, CA		
	8. AGE OF MOTHER (AT TIME OF THIS BIRTH) 21 YEARS	9. COLOR OR RACE OF MOTHER CAUCASIAN		10a. RESIDENCE OF MOTHER--STREET ADDRESS 6300 EASTSIDE CALPELLA ROAD		10b. INSIDE CITY CORP. LIMITS? SPECIFY YES OR NO NO	
	10c. RESIDENCE OF MOTHER--CITY OR TOWN UKIAH			10d. RESIDENCE OF MOTHER--COUNTY MENDOCINO		10e. RESIDENCE OF MOTHER--STATE CALIFORNIA 9548	
FATHER OF CHILD	11a. NAME OF FATHER--FIRST NAME TIMOTHY	11b. MIDDLE NAME OLIVER	11c. LAST NAME STOEN		12. BIRTHPLACE (STATE OR FOREIGN COUNTRY) MILWAUKEE, WISCONSIN		
	13. AGE OF FATHER (AT TIME OF THIS BIRTH) 34 YEARS	14. COLOR OR RACE OF FATHER CAUCASIAN		15a. PRESENT OR LAST OCCUPATION ASS'T DIST. ATTORNEY		15b. KIND OF INDUSTRY OR BUSINESS LEGAL	
INFORMANT'S CERTIFICATION	I HEREBY CERTIFY THAT I HAVE REVIEWED THE ABOVE STATED INFORMATION AND TO THE BEST OF MY KNOWLEDGE AND BELIEF IT IS TRUE AND CORRECT.				16a. PARENT OR OTHER INFORMANT--SIGNATURE (IF OTHER THAN PARENT, EMPLOYER, ATTORNEY, CLERGYMAN, OR OTHER PERSON ATTENDING TO BIRTH) <i>Grace Lucy Stoen</i>		16b. DATE REVIEWED AND SIGNED BY INFORMANT 1-26-72
ATTENDANT'S CERTIFICATION	I HEREBY CERTIFY THAT I ATTENDED THIS BIRTH AND THAT THE CHILD WAS BORN ALIVE AT THE HOUR, DATE AND PLACE STATED ABOVE.				17a. ATTENDANT--SIGNATURE (IF OTHER THAN PARENT, EMPLOYER, ATTORNEY, CLERGYMAN, OR OTHER PERSON ATTENDING TO BIRTH) <i>John Stoen</i>		17b. DATE SIGNED BY ATTENDANT 1-26-72
LOCAL REGISTRAR	18. REQUEST ON FORM FROM SOLICITATION LISTS				19. LOCAL REGISTRAR--SIGNATURE <i>Walter C. Clowers M.D.</i>		20. DATE RECEIVED FOR REGISTRATION BY REGISTRAR FEB 2 1972

EXHIBIT A BB-31-6-134

**CONSENT TO ADMISSION OF  
EXPECTANT FATHER TO DELIVERY ROOM**

The undersigned, husband and wife, expecting the birth of a child, hereby request admission of husband to the delivery room of SANTA ROSA MEMORIAL Hospital during the birth of the child.

If this request is granted, the undersigned husband agrees to conform to all the rules and regulations of the Hospital and to comply with all of the orders and directions of the attending physician

This is to certify that the undersigned has been thoroughly instructed by the attending physician as to the practices and procedures of the Hospital in the delivery room and has been thoroughly informed as to the nature and consequences of the medical procedures to be performed, and the undersigned releases the Hospital, its employees and agents, as well as the attending physician and his associates, of any and all responsibility in the event the husband's attendance in the delivery room leads to injury

Timothy Oliver Stoen  
Husband

Grace Stoen  
Wife (patient)

Date: January 25, 1972

Time: 11:25 A.M.

**CERTIFICATE OF ATTENDING PHYSICIAN**

I hereby certify that I am the attending physician of the above-named patient; that I have examined the patient and conferred with both the patient and her husband, and that it is my opinion that the patient and her husband fully understand the nature of the husband's admission to the delivery room and the rules and regulations of the Hospital, as well as the nature and consequences of the medical procedures to be performed. It is my further opinion that the attendance of the husband during the birth of the child will not be detrimental to the patient, the child, or the husband.

J. S. Bell MD

BB-31-6-135

FRANK DE M. HILL, M.D.  
UROLOGY  
8888 CALIFORNIA STREET - SUITE 808  
SAN FRANCISCO, CALIFORNIA 94118

TELEPHONE (415) 668-3600

February 27, 1978

Mr. Timothy O. Stoen  
2731 Woolsey Street  
Berkeley, California 94705

Dear Mr. Stoen:

At your request, I am sending along a summary of the urological findings as of your visit with me on February 22, 1978.

As you will recall, we discussed the length of your marriage and the separation and the other events which are of great concern to you regarding the establishment of the paternity for your boy. I will merely mention that you have had no past urologic symptoms nor a previous semen analysis and that voiding at the present time is normal, erections are described by you as within normal limits, as is ejaculation.

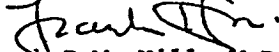
It was my feeling that the past history was not relevant to the present problem.

On examination, the abdomen and genitalia were unremarkable. On rectal examination, the sphincter tone was intact, the rectal ampulla clear, the prostate was small and clinically benign, and the prostatic expressate was microscopically clear.

The urinalysis and stain of sediment were within normal limits. A semen specimen (delivered in the office) showed a 3 cc. volume with 80,000,000 sperm per cc., about 95% excellent directional motility, fewer than 10% abnormal forms, and these primarily microheads. There was about 65% motility at three hours.

It was my impression that this specimen appeared to be within the limits of normal.

Very sincerely yours,

  
Frank DeM. Hill, M.D.

FDH:jh

cc: Roger Kimball, M.D.  
350 Parnassus  
San Francisco, California 94117

EXHIBIT C

BB-31-6-136

# Inside Peoples Temple

By Marshall Kilduff and Phil Tracy

“... Jim Jones is one the state's most politically potent leaders. But who is he? And what's going on behind his church's locked doors? ...”

For Rosalynn Carter, it was the last stop in an early September campaign tour that had taken her over half of California, a state where her husband Jimmy was weak. So Rosalynn gamely encouraged the crowd of 750 that had gathered for the grand opening of the San Francisco Democratic party headquarters in a seedy downtown storefront. She smiled bravely despite the heat.

Mrs. Carter finished her little pep talk to mild applause. Several other Democratic bigwigs got polite receptions, too. Only one speaker aroused the crowd: he was the Reverend Jim Jones, the founding pastor of Peoples Temple, a small community church located in the city's Fillmore section. Jones spoke briefly and avoided endorsing Carter directly. But his words were met with what seemed like a wall-pounding outpour. A minute and a half later the cheers died down.

“It was embarrassing,” said a rally organizer. “The wife of a guy who was going to the White House was shown up by somebody named Jones.”

If Rosalynn Carter was surprised, she shouldn't have been. The crowd belonged to Jones. Some 600 of the 750 listeners were delivered in temple buses an hour and a half before the rally. The organizer, who had called Jones for help, remembered how gratified she'd felt when she first saw the Jones followers spilling off the buses. “You should have seen it—old ladies on crutches, whole families, little kids, blacks, whites. Made to order,” said the organizer, who had correctly feared that without Jones Mrs. Carter might have faced a half-empty room.

“Then we noticed things like the bodyguards,” she continued. “Jones had

his own security force [with him], and the Secret Service guys were having fits,” she said. “They wanted to know who all these black guys were, standing outside with their arms folded.”

The next morning more than 100 letters arrived. “They were really all the same,” she said. ““Thanks for the rally, and, say, that Jim Jones was so inspirational.” Look, we never get mail, so we notice one letter, but 100?” She added, “They had to be mailed before the rally to arrive the next day.”

But what surprised that organizer was really not that special. She just got a look at some of the methods Jim Jones has used to make himself one of the most politically potent religious leaders in the history of the state.

Jim Jones counts among his friends several of California's well-known public officials. San Francisco mayor George Moscone has made several visits to Jones's San Francisco temple, on Geary Street, as have the city's district attorney Joe Freitas and sheriff Richard Hongisto. And Governor Jerry Brown has visited at least once. Also, Los Angeles mayor Tom Bradley has been a guest at Jones's Los Angeles temple. Lieutenant Governor Mervyn Dymally went so far as to visit Jones's 27,000-acre agricultural station in Guyana, South America, and he pronounced himself impressed. What's more, when Walter Mondale came campaigning for the vice-presidency in San Francisco last fall, Jim Jones was one of the few people invited aboard his chartered jet for a private visit. Last December Jones was appointed to head the city's Housing Authority Commission.

The source of Jones's political clout is not very difficult to divine. As one politically astute executive puts it: “He controls votes.” And voters. During San Francisco's run-off election for mayor in December of 1975, some 150 temple

members walked precincts to get out the vote for George Moscone, who won by a slim 4,000 votes. “They're well-dressed, polite and they're all registered to vote,” said one Moscone campaign official.

Can you win office in San Francisco without Jones? “In a tight race like the ones that George or Freitas or Hongisto had, forget it without Jones,” said State Assemblyman Willie Brown, who describes himself as an admirer of Jones's.

Jones, who has several adopted children of differing racial backgrounds, is more than a political force. He and his church are noted for social and medical programs, which are centered in his three-story structure on Geary Street. Temple members support and staff a free diagnostic and outpatient clinic, a physical therapy facility, a drug program that claims to have rehabilitated some 300 addicts and a legal aid program for about 200 people a month. In addition, the temple's free dining hall is said to feed more indigents than the city's venerable St. Anthony's dining room. And temple spokesmen say that these services to the needy are financed internally, without a cent of government or foundation money.

Jones and his temple are also applauded for their ardent support of a free press. Last September, Jones and his followers participated in a widely publicized demonstration in support of the four Fresno newsmen who went to jail rather than reveal their confidential news sources. The temple also contributed \$4,400 to twelve California newspapers—including the *San Francisco Chronicle*—for use “in the defense of free press,” and once gave \$4,000 to the defense of Los Angeles *Times* reporter Bill Farr, who also went to jail for refusing to name a news source.

In addition, at Jones's direction the temple makes regular contributions

*San Francisco Chronicle Reporter Marshall Kilduff and New West contributing editor Phil Tracy were assisted by freelance newsman George Klineman.*



The holy host: At a 1976 temple lunch, Reverend Jones sat between two friends, S.F. mayor Moscone (left) and Lieutenant Governor Dymally.

several community groups, including the Telegraph Hill Neighborhood Center and Health Clinic, the NAACP, the ACLU and the farmworkers' union. When a local pet clinic was in trouble, Peoples Temple provided the money needed to keep it open. The temple has also set up a fund for the widows of slain policemen, and the congregation runs an escort service for senior citizens.

To many, the Reverend Jim Jones is the epitome of a selfless Christian.

The reverend was born James Thurman Jones, and grew up in the Indiana town of Lynn. While attending Butler University in Indianapolis, where he received his degree in education, Jones opened his first temple (in downtown Indianapolis). Although he had no formal training as a minister and was not affiliated with any church, his temple grew. It featured an active social program, including a "free" restaurant for the down-and-out. And the congregation was integrated, a courageous commitment in the years before Martin Luther King became a national figure—particularly in Indianapolis, once the site of the Ku Klux Klan's national office.

Then at around Christmas of 1961,

according to a former associate named Ross Case, Jones had a vision. He saw Indianapolis being consumed in a holocaust, presumably a nuclear explosion. Fortunately for him, *Esquire* had just run an article on the nine safest spots in the event of nuclear war. Eureka, California, was called the safest location; another safe area was Belo Horizonte, Brazil. Jones headed for Belo Horizonte, and Case went to Northern California.

Jones eventually returned and visited Case in Ukiah. Jones liked California, and twelve years ago this month, he and his wife Marceline incorporated Peoples Temple in California: Jones and some 100 faithful settled in Redwood Valley, a hamlet outside Ukiah.

Jones's congregation grew, and he soon became a political force in Mendocino County. In off-year elections, where the total vote was around 2,500, Jones could control 300 to 400 ballots, or nearly 16 percent of the vote. "I could show anybody the tallies by precinct and pick out the Jones vote," says Al Barbero, county supervisor from Redwood Valley.

Then, in 1970, Jones started holding services in San Francisco: one year later he bought the Geary Street temple. And later that same year, he expanded to Los

Angeles by taking over a synagogue on South Alvarado Street.

One success followed another, and his flock grew to an estimated 20,000. Jones's California mission seemed blessed.

Although Jones's name is well-known, especially among the politicians and the powerful, he remains surrounded by mystery. For example, his Peoples Temple has two sets of locked doors, guards patrolling the aisles during services and a policy of barring passersby from dropping by unannounced on Sunday mornings. His bimonthly newspaper, *Peoples Forum*, regularly exalts socialism, praises Huey Newton and Angela Davis and forecasts a government takeover by American Nazis. And though Jones is a white fundamentalist minister, his congregation is roughly 80 percent to 90 percent black.

How does Jones manage to appeal to so many kinds of people? Where does he get the money to operate his church's programs, or maintain his fleet of buses, or support his agricultural outpost in Guyana? Why does he surround himself with bodyguards—as many as fifteen at a time? And above all, what is going on behind the locked and guarded doors of Peoples Temple?

## Ten Who Quit the Temple Speak Out

Beginning two months ago, when it became known that *New West* was researching an article on Peoples Temple, the magazine, its editors and advertisers were subjected to a bizarre letter-and-telephone campaign. At its height, our editorial offices in San Francisco and Los Angeles were each receiving as many as 50 phone calls and 70 letters a day. The great majority of the letters and calls came from temple members and

supporters, as well as such prominent Californians as Lieutenant Governor Mervyn Dymally, Delancey Street founder John Maher, San Francisco businessman Cyril Magnin, and savings and loan executive Anthony Frank. The messages were much the same: We hear *New West* is going to attack Jim Jones in print; don't do that. He's a good man who does good works.

The flood of calls and letters attracted

wide attention, which, in turn, prompted newsman Bill Barnes to report the campaign in the *San Francisco Examiner*. The *Examiner* also reported an unconfirmed break-in one week later at our San Francisco office.

After the Barnes article, we began getting phone calls from former temple members. At first, while insisting on anonymity, the callers volunteered "background" about Jim Jones's "cruel-

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## "... Peoples Temple members beat his sixteen-year-old daughter so badly, says Elmer Mertle, that 'her butt looked like hamburger' ..."

ty" to congregation members, in addition to making several other specific charges.

We told the callers that we were not interested in such anonymous whispers. But then a number of them, like Deanna and Elmer Mertle, called back and agreed to meet in person, to be photographed, and to tell their attributed stories for publication.

Based on what these people told us, life inside Peoples Temple was a mixture of Spartan regimentation, fear and self-imposed humiliation. As they told it, the Sunday services to which dignitaries were invited were orchestrated events. Actually, members were expected to attend services two, three, even four nights a week—with some sessions lasting until daybreak. Those members of the temple's governing council, called the Planning Commission, were often compelled to stay up all night and submit regularly to "catharsis"—an encounter process in which friends, even mates, would criticize the person who was "on the floor." In the last two years, we were told, these often humiliating sessions had begun to include physical beatings with a large wooden paddle, and boxing matches in which the person on the floor was occasionally knocked out by opponents selected by Jones himself. Also, during regularly scheduled "family meetings," attended by up to 1,000 of the most devoted followers, as many as 100 people were lined up to be paddled for such seemingly minor infractions as not being attentive enough during Jones's sermons. Church leaders also instructed certain members to write letters incriminating themselves in illegal and immoral acts that never happened. In addition, temple members were encouraged to turn over their money and property to the church and live communally in temple buildings; those who didn't ran the risk of being chastised severely during the catharsis sessions.

In all, we interviewed more than a dozen former temple members. Obviously they all had biases. (Grace Stoen, for example, has sued her husband, a temple member, for custody of their five-year-old son John. The child is reportedly in Guyana.) So we checked the verifiable facts of their accounts—the property transfers, the nursing and foster home records, political campaign contributions and other matters of public record. The details of their stories checked out.

One question, in particular, troubled us: Why did some of them remain mem-

bers long after they became disenchanted with Jones's methods and even fearful of him and his bodyguards? Their answers were the same—they feared reprisal, and that their stories would not be believed.

The people we interviewed are real; their names are real. They all agreed to be tape-recorded and photographed while telling their side of the Jim Jones story.

### Elmer and Deanna Mertle of Berkeley

After Elmer and Deanna Mertle joined the temple in Ukiah in Novem-



They beat his daughter badly: Elmer Mertle.

ber, 1969, he quit his job as a chemical technician for Standard Oil Company, sold the family's house in Hayward and moved up to Redwood Valley. Eventually five of the Mertle's children by previous marriages joined them there.

"When we first went up [to Redwood Valley], Jim Jones was a very compassionate person," says Deanna. "He taught us to be compassionate to old people, to be tender to the children."

But slowly the loving atmosphere gave way to cruelty and physical punishments. Elmer said, "The first forms of punishment were mental, where they would get up and totally disgrace and humiliate the person in front of the whole congregation. . . . Jim would then come over and put his arms around the person and say, 'I realize that you went through a lot, but it was for the cause. Father loves you and you're a stronger person now. I can trust you

more now that you've gone through this and accepted this discipline.'"

The physical punishment increased, too. Both the Mertles claim they received public spankings as early as 1972—but they were hit with a belt only "about three times." Eventually, they said, the belt was replaced by a paddle and then by a large board dubbed "the board of education," and the number of times adults and finally children were struck increased to 12, 25, 50 and even 100 times in a row. Temple nurses treated the injured.

At first, the Mertles rationalized the beatings. "The [punished] child or adult would always say, 'Thank you, Father,' and then Jim would point out the next week how much better they were. In our minds we rationalized. . . . that Jim must be doing the right thing because these people were testifying that the beatings had caused their life to make a reversal in the right direction."

Then one night the Mertles' daughter Linda was called up for discipline because she had hugged and kissed a woman friend she hadn't seen in a long time. The woman was reputed to be a lesbian. The Mertles stood among the congregation of 600 or 700 while their daughter, who was then sixteen, was hit on her buttocks 75 times. "She was beaten so severely," said Elmer, "that the kids said her butt looked like hamburger."

Linda, who is now eighteen, confirms that she was beaten: "I couldn't sit down for at least a week and a half."

The Mertles stayed in the church for more than a year after that public beating. "We had nothing on the outside to get started in," says Elmer. "We had given [the church] all our money. We had given all of our property. We had given up our jobs."

Today the Mertles live in Berkeley. According to an affidavit they signed last October in the presence of attorney Harriet Thayer, they changed their names legally to Al and Jeanne Mills because, at the church's instruction, "we had signed blank sheets of paper, which could be used for any imaginable purpose, signed power of attorney papers, and written many unusual and incriminating statements [about themselves], all of which were untrue."

### Birdie Marable of Ukiah

"I never really thought he was God, like he preached, but I thought he was a prophet," said Birdie Marable, a beautician who was first attracted to Jones in

1968 because her husband had a liver ailment. She had hoped Jones might be the healer to save him.

On one of the trips to services in Redwood Valley, Marable noticed Jones's aides taking some children aside and asking, "What color house did my friend have, things like that," she says. "Then during the services, Jim called [one woman] out and told her the answers that the children had given as though no one had told him."

She became skeptical of Jones after that, and remained skeptical when her husband's health did not improve; the cancer "cures" Jones was performing seemed phony to her. Yet eventually she moved to Ukiah and ran a rest home for temple members at Jim's suggestion.

One summer she was talked into taking a three-week temple "vacation" through the South and East. "Everybody paid \$200 to go on the trip, but I told them I wasn't able to do so," she added.

The temple buses were loaded up in San Francisco, and more members were packed aboard in Los Angeles. "It was terrible. It was overcrowded. There were people sitting on the floor, in the luggage rack, and sometimes people [were] underneath in the compartment where they put the bags," she said. "I saw some things that really put me wise to everything," she added. "I saw how they treated the old people." The bathrooms were frequently stopped up. For food, sometimes a cold can of beans was opened and passed around.

"I decided to leave the church when I got back. I said when I get through telling people about this trip, ain't nobody going to want to go no more. [But] as soon as we arrived back, Jim said . . . don't say nothing." She left the church in silence.

#### Wayne Pietila of Petaluma And Jim and Terri Cobb of San Francisco

Wayne Pietila and Jim Cobb guarded the cancers. "If anyone tried to touch them, we were supposed to eat the cancers or demolish the guy," said Cobb, who is six-feet, two-inches tall. Pietila was licensed by the Mendocino County Sheriff's Department to carry a concealed weapon; reportedly he was one of several Jones aides with such a permit.

It was during the Redwood Valley healing sessions in 1970, when nervous hope for relief from the pains of age spread among the congregation, that Cobb and Pietila would guard the cancers. Finally Jones would ask for someone who believed herself to be suffering from cancer. That was the signal for Cobb's sister, Terri, to slip into a side restroom and shoo out whoever might be

there. Then Jones's wife Marceline and a trembling excited old woman would disappear into the stall for a moment. Marceline would emerge holding a foul-smelling scrap of something cupped in a napkin a cancer "passed." Marceline and the old woman would return to the main room to screams, applause, a thunder of music. Jim Jones had healed again.

But one time, Terri got a chance to look into the "cancer bag." "It was full of napkins and small bits of meat, individually wrapped. They looked like chicken gizzards. I was shocked."

Wayne Pietila recalled another healing incident. On the eve of a trip to Seattle in 1970 or 1971, as Jones was leaving his house, a shot cracked out and he fell. "There was blood all around and people [were] screaming and crying, just hysterical." Jones was lifted to his feet and helped to his house. A few minutes



They took her best watch: *Laura Cornelious.*

later, Jones walked out of the house with a clean shirt on. "He said he'd healed himself," Pietila said. "He used [the incident] for his preaching during the whole Seattle trip."

#### Micki Touchette of San Francisco

The Touchette family followed Jones to California in 1970. They lived in Stockton for a while, then moved up to Redwood Valley, where they bought a house and converted it into a home for emotionally disturbed boys.

During 1972 and 1973 Micki and other temple members were expected to travel to Los Angeles services every other weekend. One of her jobs was to count the money after offerings. Micki, a junior-college graduate, had the combination to the temple's Los Angeles safe. She says, "It was very simple to take in \$15,000 in a

weekend, and this was [four] years ago. [To encourage larger offerings, Jones] would say, 'We folks, we've only collected \$500 or \$700,' and we would have [in reality] several thousand."

In addition to attending Wednesday night family meetings and weekend services, Micki also was part of letter-writing efforts directed by church officials. "We'd write various politicians throughout the state, throughout the country, in praise of something that they had done. I wrote Nixon, wrote Tunney. I remember writing the chief of the San Francisco Police Department," she said. Micki, who lived in temple houses apart from her parents, would often be handed a sheet listing the points she would have to include in the letter. "It would tell you how and what to say and you'd word it yourself." She says she also would regularly use aliases she made up.

When Micki left the church in 1973 along with seven other young people, including Terri and Jim Cobb and Wayne Pietila, none warned their parents or other relatives. "We felt that our parents, our families . . . would just fight us and try to make us stay." Furthermore, they were all frightened. "At one point we had been told that any college student who was going to leave the church would be killed . . . not by Jones, but by some of his followers." Both Terri and Cobb recall the statement being made--by Jones.

#### Walter Jones of San Francisco

When Walt Jones, who never believed in the church, followed his wife Carol to Redwood Valley in 1974, Jim Jones asked them to take over a home for emotionally disturbed boys. The home belonged to Charles and Joyce Touchette, Micki Touchette's parents. Walt says he was told that the Touchettes were in Guyana, and that the people who had replaced them, Rick and Carol Stahl, had done such a poor job that "the care home, at that time, was under surveillance of the authorities because of the poor conditions. Some of the boys had scabies due to the filth."

In 1974 and early 1975, before Walt and his wife were granted a license to run the home, county checks (of approximately \$325 to \$350 per month for each child) for the upkeep of the boys were made out to the Touchettes and cashed by a church member who had their power of attorney. "The checks," said Walt, "were turned over to someone in charge of all the funds [for the church's care homes] at the time. [The temple] allotted us what they felt were sufficient funds for the home and supplied us with foodstuffs and various articles of clothing." Jones says the food was mostly canned staples, and the clothes

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“... Jones held a snake close to the terrified old woman. ‘Viola screamed,’ said a member. ‘And he still held that snake there’...”

were donations from other temple members. Walt is uncertain how much of the approximate total of \$2,000 a month of county funds earmarked for the upkeep of his boys actually ended up in his hands; his wife kept the books. But, he claimed, “it was very inadequate.”

After the Joneses were granted their own license in 1975, the checks from the Alameda County Probation Department (which placed the boys in the home) were made out to him and his wife. “But still the church requested that we turn over what remained of the funds,” says Walt Jones. “Approximately \$900 to \$1,000 [per month] were turned over to the church.” And he added, “I do remember that there were times when all of the checks were signed over to the church.”

#### Laura Cornelious of Oakland

Laura Cornelious was one of the privates in the Peoples Temple's army. She was in the temple about five years before leaving in 1975—just one of dozens of elderly black grandmothers who attend each meeting of the San Francisco Housing Authority Commission that Jim Jones chairs.

The first thing that bothered her was the constant requests for money. “After I was in some time,” she says, “it was made known to us that we were supposed to pay 25 percent of our earnings [the usual sum, according to practically all the former members that we interviewed].” It was called “the commitment.” For those who could not meet the commitment, she says, there were alternatives, like baking cakes to sell at Sunday services—or donating their jewelry. “He said that we didn't need the watches—my best watch,” she recalls sadly. “He said we didn't need homes—give the homes, furs, all of the best things you own.”

Some blacks gave out of fear—fear that they could end up in concentration camps. The money was needed, she was told, “to build up this other place [Guyana—the ‘promised land’], so we would have someplace to go whenever they [the fascists in this country] were going to destroy us like they did the Jews. [Jones said] that they would put [black people] in concentration camps, and that they would do us like the Jews... in the gas ovens.”

Laura Cornelious was also bothered by the frisking of temple members (but never dignitaries) before each service. “You even were asked to raise up on your

toes [to check] your shoes.”

The final straw, she says, came the night Jones brought a snake into the services. “Viola... she was up in age, in her eighties, and she was so afraid of snakes and he held the snake close to her [chest] and she just sat there and screamed. And he still held it there.”

#### Grace Stoen of San Francisco

Grace Stoen was a leader among the temple hierarchy, though she was never a true believer. Her husband Tim was the temple's top attorney, and one of its first prominent converts. Later, while still a church insider, he became an



They have her five-year-old boy: Grace Stoen.

assistant D.A. of Mendocino County, and then an assistant D.A. under San Francisco D.A. Joe Freitas. Tim resigned to go to Jones's Guyana retreat in April of this year.

Grace agreed to join the temple when she married Tim in 1970, and gradually she acquired enormous authority. She was head counselor, and at the Wednesday night family meetings, she would pass to Jones the names of the members to be disciplined.

She was also the record keeper for seven temple businesses. She paid out from \$30,000 to \$50,000 per month for the auto and bus garage bills and also doled out the slim temple wages. And she was one of several church notaries. She kept a notary book, a kind of log of documents that she officially witnessed—pages of entries including power-of-attorney statements, deeds of trust, guardianship papers, and so on,

signed by temple members and officials.

She recalled why Jones decided to aim for Los Angeles and San Francisco. “Jim would say, ‘If we stay here in the valley, we're wasted. We could make it to the big time in San Francisco.’”

And expanding to Los Angeles, Jones told his aides, “was worth \$15,000, to \$25,000 a weekend.”

During the expansion in 1972, members would pile into the buses at 5 P.M. on a Friday night in Redwood Valley, stop at the San Francisco temple for a meeting that might last until midnight and then drive through the night to arrive in Los Angeles Saturday in time for six-hour services. On Sunday, church would start at 11 A.M. and end at 5 P.M. Then, the Redwood Valley members would pile back on the buses for the long trip home; they would arrive by daybreak Monday.

Some of the inner circle, like Grace Stoen, rode on Jim's own bus, number seven. “The last two seats and the whole back seat were taken out and a door put across it,” she said. “Inside there was a refrigerator, a sink, a bed and a plate of steel in the back so nobody could ever shoot Jim. The money was kept back there in a compartment.” According to attendance slips she collected, the other 43-seat buses sometimes held 70 to 80 riders.

Jones's goal in San Francisco, Grace said, was to become a political force. His first move was to ingratiate himself with fellow liberal and leftist figures—D.A. Freitas, Sheriff Hongisto, Police Chief Charles Gain, Dennis Banks, Angela Davis.

Sometimes Jones nearly tripped up. Once, said Grace, when Freitas and his wife dropped in unexpectedly, temple aides quickly pulled them into a side room and sent word to Jones in the upstairs meeting hall. Just in time. The pastor was wrapped up in one of his “silly little things,” said Grace. “He was having everybody shout ‘Shit! Shit! Shit!’ to teach them not to be so hypocritical.” When Freitas was shown in, everyone just laughed at the puzzled district attorney. (D.A. Freitas confirms making an unexpected visit to the temple, but does not recall anyone using the word *shit*.)

Jones became impatient at the pace of his success. Eventually Mayor Moscone placed Jones on the Housing Authority Commission, and then intervened to assure him the chairmanship.

Strangely, as Jones's successes mounted, so did the pressures inside his

“... ‘Jones would say that we could make it in the big time,’ says Grace Stoen. ‘Expanding to L.A. alone was worth \$15,000 a weekend’ ...”

temple. “We were going to more and more meetings,” said Stoen. “[And] if anyone was getting too much sleep—say, six hours a night—they were in trouble.” On one occasion, she said, a man was vomited and urinated on.

In July of 1976, after a three-week

temple bus trip, her morale was ebbing lower, her friends were muttering about her, and there were rumors that Jones was unhappy with a number of members. “I packed my things and left [without telling Tim]. I couldn’t trust him. He’d tell Jim.”

She drove to Lake Tahoe and spent the July Fourth weekend lying on a warm beach. She dug her toes in the sand, stretched her arms and tried to relax. “But every time I turned over, I looked around to see if any of the church members had tracked me down.”

## Why Jim Jones Should Be Investigated

It is literally impossible to guess how much money and property people gave Jim Jones in the twelve years since he moved his Peoples Temple to California. Some, like Laura Cornelious, gave small things like watches or rings. Others, like Walt Jones, sold their homes and gave the proceeds to the temple.

According to nearly all the former temple members that we have spoken with, extensive, continuous pressure was put on members to deed their homes to the temple. Many complied. A brief reading of the records on file at the Mendocino County recorder’s office shows that some 30 pieces of property were transferred from individuals to the temple during the years 1968 to 1976. Nearly all these parcels were recorded as gifts.

Interestingly, several of the “gifts” were signed or recorded improperly. The deed to a piece of property signed by Grace and Timothy Stoen was notarized on June 20, 1976. Grace Stoen told *New West* that on that date, when she was supposed to be in Mendocino signing the deed before a temple notary, she and several hundred temple members were in New York City. Grace Stoen said she signed the deed under pressure from her husband, Tim, months before it was notarized. And similar irregularities appear on a deed the Mertles turned over to the temple. A thorough investigation of the circumstances surrounding the transfers of the properties is clearly required.

In the last few issues of *Peoples Forum*, the temple newspaper, there are several references to the claim that 130 disturbed or incorrigible youths were being sent to the temple’s Guyana mission. A church spokesman confirmed that these youngsters were released to the temple by “federal courts, state courts, probation departments” and other agencies. An article in the July issue of the temple newspaper on the Guyana mission’s youth program reports that, “In certain cases when a young person is testing the environment. . . physical discipline has

produced the necessary change.” The article goes on to describe a “wrestling match” that sounds all too similar to the “boxing matches” some former temple members described. If there is even the slightest chance of mistreatment of the 130 youths the temple claims to have under its guidance in Guyana, a complete investigation by both state and federal authorities would be required.

An investigation of the “care homes” run by the temple or temple members in Redwood Valley may also be in order. Both Walt Jones and Micki Touchette have stated that anywhere from \$800 to \$1,000 of the monthly funds provided by the state for the care of the six boys in the Touchette home were actually funneled to the temple. If those figures are accurate, as much as \$38,000 to \$48,000 may have been channeled into the church’s coffers during the four years the Touchette home was open. It is known that at least two other “care homes” for boys were run by the church or its members. In addition, at least six residential homes licensed by Mendocino County were owned or operated by the temple. They housed from six to fourteen senior citizens each, and the county provided upwards of \$325 per month per individual. An investigation should be launched immediately to determine if any of the money paid for the care of the elderly actually went to the temple.

Files at the Mendocino County recorder’s office show that the temple has sold off a number of its properties. The Redwood Valley temple itself is currently for sale for an estimated \$225,000. The Los Angeles temple is also for sale. The three Mendocino “care homes” that are still operating are up for sale. Several former temple members believe Jones and a few hundred of his closest followers may be planning to leave for Guyana no later than September of this year. The ex-members we interviewed had the ability to walk away from the temple once they found the courage to do it. Whether the church will permit

those who move to Guyana the option of ever leaving is questionable.

Jones has been in Guyana for the last three weeks and was unavailable to us as this magazine article went to press. In a phone interview, two spokesmen for the temple, Mike Prokes and Gene Chaikin, denied all of the allegations made by the former temple members we interviewed. Specifically, they denied any harassment, coercion or physical abuse of temple members. They denied that the church attempted to force members to donate their property or homes. They also denied that Jones faked healings. They confirmed that the temple’s churches and property in Redwood Valley and Los Angeles are for sale, but went on to deny that Jones’s closest followers are planning to relocate in Guyana any time soon.

Finally, something must be said about the numerous public officials and political figures who openly courted and befriended Jim Jones. While it appears that none of the public officials from Governor Brown on down knew about the inner world of Peoples Temple, they have left the impression that they used Jones to deliver votes at election time and never asked any questions. They never asked about the bodyguards. Never asked about the church’s locked doors. Never asked why Jones’s followers were so obsessively protective of him. And apparently, some never asked because they didn’t want to know.

The story of Jim Jones and his Peoples Temple is not over. In fact, it has only begun to be told. If there is any solace to be gained from the tale of exploitation and human foible told by the former temple members in these pages, it is that even such a power as Jim Jones cannot always contain his followers. Those who left had nowhere to go and every reason to fear pursuit. Yet they persevered. If Jones is ever to be stripped of his power, it will not be because of vendetta or persecution, but rather because of the courage of these people who stepped forward and spoke out.

**FILED**

NOV-1 1978

~~CARL H. STOEN, Clerk~~

~~ST. M. P. AMARILLO, Clerk~~

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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO  
10

11 PEOPLES TEMPLE OF THE DISCIPLES  
OF CHRIST, a nonprofit corpora-  
12 tion, JEAN BROWN, and JAMES  
McELVANE,  
13

14 Plaintiffs,

15 v.

16 TIMOTHY OLIVER STOEN,

17 Defendant.  
18

No. 740531

NOTICE OF MOTION UNDER CCP §  
2019 (b)(1) FOR PROTECTIVE ORDER  
THAT DEPOSITION NOT BE TAKEN AND  
FOR REASONABLE EXPENSES AND AT-  
TORNEY'S FEES, POINTS AND AUTH-  
ORITIES, SUPPORTING DECLARATION,  
AND APPLICATION FOR ORDER SHOR-  
TENING TIME FOR SERVICE

Date: November 7, 1978

Time: 9:30 A.M.

Department: 9 Law and Motion

19 To each party and to the attorney of record of each party in this  
20 action:

21 PLEASE TAKE NOTICE that on November 7, 1978, at 9:30 A.M., or  
22 as soon thereafter as the matter can be heard, in Department 9 (Law  
23 and Motion) of the Superior Court, 4th Floor, City Hall, San Francis-  
24 co, California, defendant Timothy Oliver Stoen will move the Court  
25 for a protective order that the deposition of the persons named in  
26 the Notice of Taking Deposition attached hereto, scheduled for Novem-

BB-31-6-143

ber 9 and 10, 1978, not be taken, and for reasonable costs and expenses, including attorney's fees, incurred in this proceeding.

This motion is made on the ground that there is good cause for the order sought in that (1) the items demanded are irrelevant, rendering the deposition a violation of CCP § 2016(b), and (2) the deposition is intended solely to cause, and will have the effect of causing, annoyance, embarrassment, and oppression, thereby violating CCP § 2019(b)(1).

This motion is based on this notice, the Notice of Taking Deposition attached hereto as Exhibit A (three pages), the pleadings, records, and files in this action, the attached memorandum of points and authorities, the attached supporting declaration of defendant, and the attached order shortening time.

DATED: October 31, 1978.

PATRICK SANSFIELD HALLINAN

Attorney for Defendant

1 APPLICATION FOR ORDER SHORTENING TIME FOR SERVICE OF  
2 NOTICE OF MOTION FOR PROTECTIVE ORDER AND ORDER

3 I am the attorney for defendant Timothy Oliver Stoen.

4 It is necessary that the time for service of the notice of  
5 motion for protective order, the supporting declaration of defendant,  
6 and the memorandum of points and authorities, be shortened so that  
7 the same may be served not later than five (5) days before the time  
8 set for hearing of the motion because of the following facts: the  
9 Notices of Taking Deposition filed by plaintiff are self-executing  
10 and gave defendant no opportunity to object to their issuance on the  
11 valid grounds set forth in defendant's memorandum of points and au-  
12 thorities attached hereto; given the press of business, there was  
13 insufficient time for defendant's protective order pleadings to be  
14 researched and prepared until October 31, 1978; and there will be no  
15 hardship on the counsel for PEOPLES TEMPLE because presumably they  
16 acquainted themselves with the appropriate discovery law before filing  
17 and serving the aforesaid Notices of Taking Deposition.

18 I declare under penalty of perjury that the above is true and  
19 correct and that this declaration was executed on November 1, 1978,  
20 at San Francisco, California.

21  
22  
23 Patrick Sarsfield Hallinan  
Attorney for Defendant

24  
25 ORDER

26 Good cause appearing, IT IS ORDERED that the time for service of

1 the notice of motion for protective order, supporting declaration,  
2 and memorandum of points and authorities is shortened so that the  
3 same may be served on plaintiff not later than five (5) days before  
4 the time set for the hearing of the motion for protective order.  
5 Dated: November 1, 1978.

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26

FRANCIS W. MAYER

---

Judge

1 CHARLES R. GARRY, ESQ.,  
2 GARRY, DREYFUS, McTERNAN, BROTSKY, HERNDON & PESONEN,  
3 1256 MARKET STREET  
4 SAN FRANCISCO, CA 94102  
5 TEL.: 864-3131

6 ATTORNEY FOR PLAINTIFF

7 → NO APPEARANCE NECESSARY, RECORDS ONLY  
8 IF YOU DESIRE COPIES CONTACT  
9 GAGAN & McDANIELS, 9 FIRST ST.  
10 SAN FRANCISCO (PHONE 982-4766)

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE CITY & COUNTY OF SAN FRANCISCO

13 PEOPLES TEMPLE OF THE DISCIPLES  
14 OF CHRIST, a nonprofit corporation, No. 740 531  
15 et al.

16 vs  
17 TIMOTHY OLIVER STOEN

18 NOTICE OF TAKING DEPOSITION

19 SUBPENA  
20 DUCES TECUM

21 TO ALL PARTIES: PATRICK S. HALLINAN, ESQ.,  
22 345 FRANKLIN STREET  
23 SAN FRANCISCO, CA

24 PLEASE TAKE NOTICE THAT THE depositions of Custodians  
25 of Records of: RE: TIMOTHY O. (OLIVER) STOEN; TORONTO DOMINION  
26 BANK CANADA, ATTN: OPERATIONS OFFICER, ~~BANK OF AMERICA, ATTN:  
27 OPERATIONS OFFICER, 555 CALIFORNIA STREET, S.F. CA 94104~~  
28 BANK OF AMERICA, ATTN: OPERATIONS OFFICER, 1301 MARKET STREET,  
29 S.F. CA., BARCLAYS BANK OF CALIFORNIA, ATTN: OPERATIONS OFFICER,  
30 BANK OF NOVA SCOTIA, ATTN: OPERATIONS OFFICER, CHARTERED BANK  
31 OF LONDON, ATTN: OPERATIONS OFFICER, (SEE OVER  
32 will be taken on behalf of defendant,

33 at 10:00 o'clock A.M. on THURSDAY the 9 day of  
34 NOVEMBER 1978 before a Notary Public, for the City and  
35 County of San Francisco, State of California, at the offices of  
36 GAGAN & McDANIELS, 9 First Street, Room 208, San Francisco,  
37 California; said deposition will continue from said date and time  
38 over Sundays and legal holidays until completed.

39 DATED this 19 day of OCTOBER 1978

40 By [Signature]  
41 Attorney at Law

42 Exhibit A (Page 1 of 3)

BB-31-b-147

( RE: TIMOTHY O. (OLIVER) STOEN, EVERY DETAIL, EVERY ENTRY, EVERY TRANSACTION, EVERY DEPOSIT AND EVERY DISBURSEMENT RELATING TO THIS INDIVIDUAL, EITHER IN HIS OWN NAME OR AS TRUSTEE), SUTRO & CO., INC., ATTN: ARTHUR LENHARDT, VICE PRESIDENT, DEAN WITTER REYNOLDS, INC., ATTN: SALLY KRAFT, MARGIN DEPARTMENT, ( RE: TIMOTHY O.(OLIVER) STOEN; COMPLETE AND ENTIRE RECORDS RELATING TO ALL TRANSACTIONS, STOCKS BOUGHT AND SOLD, ANY INSTRUCTIONS THEREIN AND THE DATES).

Exhibit A (Page 2 of 3)

88-31-6-148



1 CHARLES R. GARRY, ESQ.,  
2 GARRY, DREYFUS, McTERNAN,  
3 BROTSKY, HERNDON & PESONEN,  
4 1256 MARKET STREET  
5 SAN FRANCISCO, CA 94102  
6 TEL.: 864-3131

7 ATTORNEY FOR PLAINTIFF

8 NO APPEARANCE NECESSARY, RECORDS ONLY  
9 IF YOU DESIRE COPIES CONTACT  
10 GAGAN & McDANIELS, 9 FIRST ST.  
11 SAN FRANCISCO (PHONE 982-4766)

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 FOR THE CITY & COUNTY OF SAN FRANCISCO

14 PEOPLES TEMPLE OF THE DISCIPLES  
15 OF CHRIST, a nonprofit corporation No. 740 531  
16 et al.

17 NOTICE OF TAKING DEPOSITION

18 vs

19 TIMOTHY OLIVER STOEN

20 SUBPENA  
21 DUCES TECUM

22 TO ALL PARTIES: PATRICK S. HALLINAN, ESQ.,  
23 345 FRANKLIN STREET  
24 SAN FRANCISCO, CA

25 PLEASE TAKE NOTICE THAT THE depositions of Custodians  
26 of Records of: RE: TIMOTHY O. (OLIVER) STOEN  
27 BANK OF AMERICA, INTERNATIONAL DIVISION,  
28 ATTN: MR. MICHAEL LEDGERWOOD, 345 MONTGOMERY STREET, S.F.  
29 CA 94104 ( ANY AND ALL RECORDS RELATING TO TRANSACTIONS OF  
30 AND/OR WITH TIMOTHY O. (OLIVER) STOEN, INDIVIDUALLY AND/OR  
31 AS TRUSTEE, INCLUDING ALL CORRESPONDENCE.

32 will be taken on behalf of defendant,  
33 at 10:00 o'clock A.M. on FRIDAY the 10 day of  
34 NOVEMBER 19 78 before a Notary Public, for the City and  
35 County of San Francisco, State of California, at the offices of  
36 GAGAN & McDANIELS, 9 First Street, Room 208, San Francisco,  
37 California; said deposition will continue from said date and time  
38 over Sundays and legal holidays until completed.

39 DATED this 20 day of OCTOBER 1978.

40 By Antonia Daniels  
41 Attorney at Law

42 88-31-6-149

1 PROOF OF SERVICE BY MAIL

2 I am a citizen of the United States; my business address is 345  
3 Franklin Street, San Francisco 94102. I am employed in the City and  
4 County of San Francisco, where this mailing occurs; I am over the  
5 age of eighteen years and not a party to the within cause. I served  
6 the within NOTICE OF MOTION FOR PROTECTIVE ORDER, MEMORANDUM OF  
7 POINTS AND AUTHORITIES, SUPPORTING DECLARATION OF DEFENDANT, AND  
8 ORDER SHORTENING TIME FOR SERVICE on the following person on the  
9 date set forth below, by placing a true copy thereof enclosed in a  
10 sealed envelope with postage thereon fully prepaid, in the United  
11 States Post Office mail box at San Francisco, California, addressed  
12 as follows:

13 Charles R. Garry, Esq.  
14 Garry, Dreyfus, McTernan, Brotsky, Herndon & Pesonen  
15 1256 Market Street  
San Francisco, CA 94102

16 I certify and declare under penalty of perjury that the fore-  
17 going is true and correct. Executed on November 1, 1978, at San  
18 Francisco, California.

19  
20  
21 PS/ PAULA E. SMITH  
22  
23  
24  
25  
26

1 PATRICK SARSFIELD HALLINAN  
Hallinan & Blum  
2 345 Franklin Street  
San Francisco, California 94102  
3  
4 Telephone: (415) 861-1151  
Attorney for Defendant

**FILED**  
NOV-1 1978  
CARL M. OLSEN, Clerk  
M. P. ANABU  
Deputy Clerk

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

11 PEOPLES TEMPLE OF THE DISCIPLES  
12 OF CHRIST, a nonprofit corpora-  
tion, JEAN BROWN, and JAMES  
13 McELVANE,

Plaintiffs,

v.

15 TIMOTHY OLIVER STOEN,

Defendant.

No. 740531

DECLARATION OF DEFENDANT IN  
SUPPORT OF MOTION UNDER CCP §  
2019 (b) (1) FOR PROTECTIVE  
ORDER THAT DEPOSITION NOT BE  
TAKEN

Date: November 7, 1978  
Time: 9:30 A.M.  
Department: 9 Law and Motion

19 I, Timothy Oliver Stoen, declare:

- 20 1. I am the defendant in this action. I object to depositions  
21 scheduled by PEOPLES TEMPLE for November 9 and 10, 1978, being taken.  
22 2. I believe the purpose of plaintiff in taking said depositions  
23 is not legitimate but rather to annoy, embarrass, and oppress. I  
24 believe the real purposes of PEOPLES TEMPLE are as follows:  
25 a. to discover the names of my clients and other individuals  
26 who have had financial dealings with me for the purpose of intimidat-

BB-31-6-151

1 ting them into terminating further contact with me; and

2 b. to engage in a "fishing expedition" for the purpose of  
3 acquiring information to be utilized, and falsely characterized, in  
4 a totally separate lawsuit it has already publicly announced, wherein  
5 it will allege (falsely) that I was an agent of the FBI and CIA while  
6 a member of PEOPLES TEMPLE.

7 3. In support of the aforesaid conclusions, I submit the follow-  
8 ing evidence:

9 a. PEOPLES TEMPLE is not seeking information about my current  
10 financial condition only but also past financial transactions.

11 b. PEOPLES TEMPLE has employed no discovery on questions of  
12 liability.

13 c. PEOPLES TEMPLE knows that while I was a member thereof,  
14 my wife and I gave them our house and that for seven years I gave  
15 them my salary beyond my immediate needs. I hereby declare that  
16 my current net worth is less than zero. I own no real property. My  
17 automobile is a 1969 Toyota for which I paid \$675.00. I owe \$15,000.00  
18 to The First National Bank of Colorado Springs for a December 1977  
19 loan taken out to finance my efforts to regain custody of my son from  
20 PEOPLES TEMPLE.

21 d. Since publicly declaring my opposition to PEOPLES TEMPLE,  
22 I have been subjected to numerous acts of harrassment designed to  
23 create ill will between myself and others. I believe these acts were  
24 committed by members of PEOPLES TEMPLE pursuant to a strategy of  
25 "divide and conquer". For example, in May 1978 a San Francisco news-  
26 paper reporter called me to inquire as to whether I was using his

1 name as supporting the sending of armed mercenaries to Guyana. He  
2 said he had received both anonymous letters and letters from PEOPLES  
3 TEMPLE members accusing me of using that reporter's name as being in  
4 support of such a scheme. I assured the reporter I had never used  
5 his name in that way.

6 e. Employees of certain Congressional offices in Washington,  
7 D.C. have informed me that they received letters discrediting me  
8 shortly after PEOPLES TEMPLE learned their particular offices may  
9 be helping me.

10 f. In May 1978 members of PEOPLES TEMPLE were ordered to  
11 write to governmental agencies protesting alleged harrassment. In  
12 an effort to discredit my standing with such agencies, PEOPLES TEMPLE  
13 leaders ordered their members to accuse me of various crimes and im-  
14 moral acts, all of which were false. For example, attached as Exhib-  
15 it A is an instruction issued to PEOPLES TEMPLE members for a letter  
16 to be sent to the State Franchise Tax Board accusing me of being a  
17 "terrorist."

18 g. Also in May 1978, an extremely scurrilous open letter  
19 dated May 15, 1978 was sent to newspapers, television and radio sta-  
20 tions, and governmental agencies throughout the United States. In  
21 an effort to create ill will between journalists and myself, this  
22 letter falsely stated that "Timothy Stoen \* \* \* Threatened to kill by  
23 poison a journalist who embarrassed him in the media." A copy of the  
24 relevant portions of that open letter is attached as Exhibit B.

25 h. On October 3, 1978, PEOPLES TEMPLE held a news conference  
26 at their San Francisco headquarters wherein their newly-acquired

1 conspiracy-hunter Mark Lane made a number of ridiculous charges and  
2 threatened to file on behalf of PEOPLES TEMPLE a "multi-million-dol-  
3 lar suit" against the FBI, CIA, Department of State, etc. One of his  
4 associates, Donald Freed, apparently stated that I acted as the con-  
5 duit to launder money through a foreign country "to finance the anti-  
6 Jones campaign." Attached as Exhibit C is an article from the San  
7 Francisco Examiner dated October 4, 1978 reporting said news confer-  
8 ence. Attached as Exhibit D is an article from the San Francisco  
9 Progress dated October 4, 1978 reporting the same conference.  
10 PEOPLES TEMPLE is extremely skilled in constructing false theories  
11 from minor pieces of information so as to divert public attention  
12 from its questionable practices. I believe that PEOPLES TEMPLE wishes  
13 to learn everything possible about my financial history so as to con-  
14 struct a totally false theory to be publicized, by lawsuit and other-  
15 wise, in an effort to divert public attention from the charges made  
16 by me and others to the effect that PEOPLES TEMPLE is operating a  
17 concentration camp in Guyana, South America.

18 I declare under penalty of perjury that the foregoing is true  
19 and correct.

20 Executed on October 31, 1978, at San Francisco, California.  
21  
22  
23

24 *Timothy Oliver Stoen*  
25 Timothy Oliver Stoen  
26

BB-31-6-154

Mr. Martin Huff, Executive Officer  
State Franchise Tax Board  
Sacramento, CA. 95867

Dear Mr. Huff,

The recent problems caused for the Peoples Temple church with the Tax Board is only the latest example of merciless harassment on the part of people with terrorist backgrounds and is financed by unethical means. Mr. Conn and Mr. Stoen, who went to the Tax Board, just threw up threats to the Disciples of Christ if they did not throw the Peoples Temple out of their ranks by May 1st. The denomination was incensed, and reported these actions immediately to the Peoples Temple.

Do not let the Tax Board take any part in hurting this remarkable church. I look to your agency to reinstate the Temple's status immediately.

Sincerely yours,

Exhibit A

BB-31-6-155

Dear Mr. [redacted]

What you publicize is your business. But a bit of information on some of the people you are using as sources to spread lies about Peoples Temple might cause you to question the credibility of those sources. Given their backgrounds and past actions, their motives for attacking an interracial, highly constructive organization are obviously not "Concern" for their relatives which they claim to have in Guyana. A recent official statement of the U.S. Department of State proves once and for all that the allegations they are making are lies. What their true motives are, no one in the media seems interested in exploring and disclosing. But it does no credit to you as journalists that you take them at face value. Consider your sources. Their credits are listed below, and there are affidavits to back up every statement.

---

Timothy Stoen:

Took \$5,000 from hard-working black people to finance a trip to France, London, Washington D.C., and New York.

Threatened to kill by poison a journalist who embarrassed him in the media.

---

There is much, much more. I personally know all these people, and I saw their names mentioned on a petition presenting themselves as loving, concerned relatives and friends of people overseas at the Peoples Temple mission, and I felt I had to write something to you to inform you of what I know to be true of them.

EXHIBIT B

BB-31-6-156



# People's Temple colony 'harassed'

People's Temple, its leader the Rev. Jim Jones and its Jonestown colony in Guyana are under a heavily financed attack by the U.S. intelligence establishment, Mark Lane charged here.

Lane, a Washington lawyer, educator and author whose works include "Rush To Judgment," a book on the John Kennedy assassination, is a director of Citizens Commission Inquiry and was invited by its local chapter to look into temple affairs.

He appeared at a news conference at the temple here yesterday after a trip to Guyana.

Attacks on the colony, both in Guyana and in Congress, have been financed with large sums of money "laundered through banks in neutral countries," and there is evidence of "a concerted effort by the U.S. intelligence establishment to destroy Jonestown," Lane said.

Included in the effort was a trans-jungle trek by a party of 20 men armed with rocket launchers and small arms, Lane said. He declined to name the leader of the group, whom he characterized as an employee of Interpol, the international police coordinating agency.

He said the leader gave him a full statement because "he said he felt misused." The group had been sent to fire on the colony's generator building, darkening the compound, after cutting their way through the supposed barbed wire

and minefields around the compound. After darkening the area, Lane said, they had planned to "free the children" from the supposed evil influences of the colony.

When they discovered there were no minefields nor barbed wire, Lane said, they contented themselves with sniping at the compound for six days. Lane related that the patrol leader told him he was amazed to be invited to visit the colony and stayed there several days.

"He told me he was satisfied that the 'concentration camp' charges against Jonestown were false and that he thought he had been misused," Lane said.

Lane declined to name the agent, but hinted that he might be named after the filing of a multi-million-dollar suit against the government, which Lane said could be expected "within 90 days."

The suit will charge, he said, that a host of federal agencies are doing all they can — much of it illegally — to scuttle the Jonestown colony.

To be named as defendants, he said, are the FBI, CIA, Department of State, Internal Revenue Service, Treasury Department, Postal Service and virtually everybody but the Coast and Geodetic Survey.

The motive for the alleged government conspiracy, he said, is that the colony of 1,200 American expatriates is an embarrassment to



MARK LANE  
Accuses U.S. agencies

the government because of its success.

As to charges that people once in the colony are not free to leave, he said that the U.S. Embassy staff has on several occasions sent a car to the colony and offered anyone who wanted one a free ride to the airport and a free flight home.

On the other hand, at another point in his dissertation, he said there are no roads to the colony but that transportation is available by boat or a complicated series of train trips or flights.

Lane was backed up by four persons who had recently returned from the colony, and by Jones' wife, Marceline, also recently returned.

Mrs. Jones said that her husband had remained in Guyana because of the advice of his attorneys and because his presence is needed there.

Exhibit C

BB-31-6-157

## Attorney claims King

By E. Cahill Maloney  
Attorney Mark Lane, leading proponent of the theory that conspiracy was behind the assassinations of former President John Kennedy and Rev. Martin Luther King, claims the House Select Committee on Assassinations now knows who killed Rev. King.

Lane, who appeared at a press conference called by People's Temple, 1895 Geary St., yesterday, alleged the committee "has absolute proof" that the assassin

was not his client, James Earl Ray.

He said he expects the congressional committee to release new information about the King case in November.

Should the committee fail to do so, Lane said he himself would reveal the names of the individuals involved in the King assassination at that time.

Lane was in San Francisco to announce that he has added People's Temple and its leader Rev. Jim Jones to his list of conspiracy victims.

Jones, a former Housing Authority commissioner, left the City a year and a half ago when charged by former temple members involving phony cancer cures, bizarre temple rituals and unusual property acquisitions surfaced in the press.

He fled to a remote jungle outpost in the interior of Guyana, South America where he and 1,200 of his followers have set up a temple agricultural mission. The mission has been de-

scribed as an armed camp which prohibits freedom of movement and communication by former assistant district attorney Timothy Stoen and other relatives of mission residents.

Lane said a personal investigation conducted by him and other members of the Citizens Committee of Inquiry, an independent organization set up in the wake of the Kennedy assassination, has convinced him that none of the charges against the

## killer is known

temple mission are true.

Donald Freed, a researcher for the Committee on Inquiry, said the Jonestown study was an offshoot of ongoing investigation into the Central Intelligence Agency's presence in Latin America, specifically Jamaica and Guyana.

He said he had evidence to show that several hundred dollars "laundered through a neighboring neutral country" helped finance a campaign of harass-

ment against the People's Temple mission in Jonestown, Guyana.

"American intelligence organizations have played a major part in the effort to destroy Jones and Jonestown," Lane alleged.

Donald Freed, a researcher for the Committee on Inquiry, said the Jonestown study was an offshoot of an ongoing investigation into the Central Intelligence Agency's presence in Latin America, specifi-

cally Jamaica and Guyana.

That presence dates back to the early sixties, Freed said.

Lane's conclusion that Jones is the butt of a government conspiracy is based on documentation of intervention in Jonestown affairs by a spate of government agencies, including the Post Office Department, which refused to forward social security checks to the mission, the State Department, the Federal Bureau of

Investigation the Treasury Department, and petitions by 57 congressmen.

Lane said a man who identified himself as an Interpol agent confirmed he had led an armed attack on the colony last year for the ostensible purpose of freeing the children.

Freed told The Progress Stoen acted as the conduit for money used to finance the anti-Jones campaign.

The only members of  
(Continued on Page 4)

# Progress

CITY  
NORTH

Wednesday, Friday and Sunday 15 Cents

Wednesday, October 4, 1978

Exhibit D (Page 1 of 2)

BB-31-6-158

## The San Francisco

Vol. 59, No. 118

Published

# King

(Continued from Page 1)

the conspiracy actually named by Lane are relatives of mission residents, who have personal gripes against Jones and the temple.

Lane admitted that charges against the temple made by former members may not have been part of a government conspiracy when they were first raised, but he claimed that by now some of the relatives are being used as ploys in conspiracy roles.

Lane called the Jonestown mission a remarkable community where one-time welfare recipients, drug addicts, alcoholics and prostitutes and people from the ghettos "who were being crushed by society" are living in fulfillment and freedom.

According to Lane, the existence of such a community "is a great embarrassment for some people in the United States."

Exhibit D (Page 2 of 2)

BB-31-6-159

1 PATRICK SANSFIELD HALLINAN  
Hallinan & Blum  
2  
3 345 Franklin Street  
San Francisco, California 94102  
4 Telephone: (415) 861-1151  
5 Attorney for Defendant

**FILED**

NOV-1 1978

~~CALIF. CLERK~~  
M. P. ANBEJ

6  
7  
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10  
11 PEOPLES TEMPLE OF THE DISCIPLES  
OF CHRIST, a nonprofit corpora-  
12 tion, JEAN BROWN, and JAMES  
McELVANE,

13 Plaintiffs,

14 v.

15 TIMOTHY OLIVER STOEN,

16 Defendant.

No. 740531

MEMORANDUM OF POINTS AND AUTHOR-  
ITIES IN SUPPORT OF MOTION FOR  
PROTECTIVE ORDER THAT DEPOSITION  
NOT BE TAKEN

Date: November 7, 1978

Time: 9:30 A.M.

Department: 9 Law and Motion

17  
18 Defendant submits the following points and authorities in sup-  
19 port of his motion for a protective order that the deposition sched-  
20 uled for November 9 and 10 not be taken and for reasonable expenses  
21 and attorney's fees. Alternatively, defendant seeks a protective  
22 order that the scope of examination of the deposition be limited to  
23 current balances in the name of defendant, and for reasonable expen-  
24 ses and attorney's fees.

25 I. ON A SHOWING OF GOOD CAUSE, THE COURT MAY MAKE AN DISCOVERY  
26 ORDER THAT JUSTICE REQUIRES TO PROTECT THE MOVING PARTY FROM ANNOY-

BB-31-6-160

1 ANCE, EMBARRASSMENT, OR OPPRESSION.

2 A. Code of Civil Procedure, Section 2019 (b)(1):

3 "Upon motion seasonably made by any party or by  
4 the person to be examined or notified to produce  
5 books, documents, or other things and upon notice,  
6 or upon the court's own motion and after giving  
7 counsel an opportunity to be heard, and in either  
8 case for good cause shown, the court in which the  
9 action is pending may make an order that the depo-  
10 sition not be taken,..., or that certain matters  
11 shall not be inquired into, or that the scope of  
12 the examination shall be limited to certain mat-  
13 ters, books, documents, or other things....; or  
14 the court may make any other order which justice  
15 requires to protect the party or witness from an-  
16 noyance, embarrassment, or oppression. In grant-  
17 ing or refusing such order the court may impose  
18 upon either party or upon the witness the require-  
19 ment to pay such costs and expenses, including  
20 attorney's fees, as the court may deem reasonable."

13 II. DISCOVERY IS RESTRICTED TO INFORMATION WHICH IS RELEVANT  
14 TO THE SUBJECT MATTER INVOLVED IN THE PENDING ACTION.

15 A. Code of Civil Procedure, Section 2016 (b):

16 "Unless otherwise ordered by the court..., the de-  
17 ponent may be examined regarding any matter, not  
18 privileged, which is relevant to the subject mat-  
19 ter involved in the pending action,... It is not  
20 ground for objection that the testimony will be  
21 inadmissible at the trial if the testimony sought  
22 appears reasonably calculated to lead to the dis-  
23 covery of admissible evidence."

21 B. The concept of subject matter relevancy is not unlimited.  
22 Discovery may be denied as being irrelevant if the information sought  
23 is so remote from the subject matter of the action that its disclo-  
24 sure would be of little or no practical benefit to the party seeking  
25 it. Ryan v. Superior Court (1960) 186 CA2d 813, 9 CR 147, quoted  
26 with approval in Columbia Broadcasting Sys., Inc. v. Superior Court

1 (1968) 263 CA2d 12, 69 CR 348. Unless one of the issues in a law-  
2 suit requires apportionment of income or deposits (which is not the  
3 situation in the instant case), the only financial records which are  
4 relevant are those which show current "financial condition and as-  
5 sets", and this would be solely on the issue of punitive damages.  
6 See Doak v. Superior Court (1968) 257 CA2d 825, 65 CR 193.

7  
8 III. A PROTECTIVE ORDER SHOULD ISSUE AGAINST THE PEOPLES TEMPLE  
9 DEPOSITION BECAUSE THE INFORMATION SOUGHT FAR EXCEEDS CURRENT FINAN-  
10 CIAL CONDITION AND THE TIMING SHOWS ITS PURPOSE SOLELY IS TO ANNOY,  
11 EMBARRASS, AND OPPRESS.

12 A. It is apparent from the face of plaintiff's Notice of Dep-  
13 osition that it seeks private financial information far beyond current  
14 financial condition. The November 9 Notice is addressed to the Cus-  
15 todian of Records of five separate banks and asks for the following  
16 information from each:

17 "Every detail, every entry, every transaction,  
18 every deposit and every disbursement relating to  
19 this individual [Timothy O. Stoen], either in his  
20 own name or as trustee \* \* \* ; complete and entire  
records relating to all transactions, stocks bought  
and sold, any instructions therein and the dates."

21 The November 10 Notice asks for "all correspondence."

22 There is absolutely no justification for the aforesaid requests.  
23 They are designed to oppress defendant into taking the trouble and  
24 expense of preparing and filing a protective order. Past deposits  
25 and disbursements, instructions for stock purchases, correspondence--  
26 what possible relevance is such information as to defendant's finan-

1 cial condition and ability to respond to punitive damages? There is  
2 none whatever.

3 Furthermore, defendant respectfully contends that even asset  
4 information is irrelevant at this point. The court's attention is  
5 called to all of the pleadings of plaintiff in this action, which  
6 suggest that the whole proceeding is shameful and oppressive. Given  
7 the discretion granted to a trial court by CCP § 2019 (b)(1), fair-  
8 ness requires that information which invades a defendant's financial  
9 privacy should be divulgable only after the deposing party has com-  
10 plete in good faith its discovery on issues of liability. The ulter-  
11 ior motives of Peoples Temple is suggested by the fact this is the  
12 very first deposition they have sought.

13 The declaration of defendant attached hereto indicates that the  
14 real purpose of Peoples Temple in seeking entries of past financial  
15 transactions is to learn the names of people defendant has been deal-  
16 ing with so that threats and other types of pressure can be applied  
17 to them in getting defendant to withdraw from the cases he has filed  
18 against Peoples Temple. Defendant's declaration shows his belief in  
19 a second oppressive purpose, i.e., for Peoples Temple to gain infor-  
20 mation for a totally separate lawsuit which it has publicly announced  
21 it plans to file against defendant, falsely alleging he was an agent  
22 of the FBI and CIA while a member of Peoples Temple.

23 B. FOR THE AFORESAID REASONS, Defendant respectfully requests  
24 the following protective order from the Court:

25 1. That the deposition of the persons named in the Notices  
26 of Deposition for November 9 and 10 not be taken; and

1                   2. That defendant be awarded reasonable costs and attor-  
2 ney's fees incurred in this proceeding.

3                   Alternatively, defendant respectfully requests that the follow-  
4 ing protective order be issued:

5                   1. That the scope of examination of the depositions be  
6 limited to existing balances in the name of defendant, and that the  
7 date of taking such depositions be continued until such time as plain-  
8 tiff files a notice that it has completed all discovery on questions  
9 of liability; and

10                   2. That defendant be awarded reasonable costs and attor-  
11 ney's fees incurred in this proceeding.

12                   DATED: October 31, 1978.

13                   Respectfully submitted,

14

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16

PATRICK SANSFIELD HALLINAN  
Attorney for Defendant

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*Yes by 2/11 97  
PERSON*

1 CHARLES R. GARRY  
2 GARRY, DREYFUS, McTERNAN, BROTSKY,  
3 HERNDON & PESONEN, INC.  
4 1256 MARKET STREET AT CIVIC CENTER  
5 SAN FRANCISCO, CALIFORNIA 94102  
6 TEL: 864-3131

7 Attorneys for Plaintiffs

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10	PEOPLES TEMPLE OF THE DISCIPLES	)	NO. 740 531
11	OF CHRIST, a nonprofit corpora-	)	DECLARATION AND
12	tion, JEAN BROWN, and JAMES McELVANE,	)	PLAINTIFFS' MEMORANDUM
13	Plaintiffs,	)	OF POINTS AND AUTHORI-
14	vs.	)	TIES IN OPPOSITION TO
15	TIMOTHY OLIVER STOEN,	)	DEFENDANT'S MOTION FOR
16	Defendant.	)	PROTECTIVE ORDER
		)	Date: Nov. 7, 1978
		)	Time: 9:30 A.M.
		)	Dept.: Law and Motion
		)	(9)

17 COME NOW plaintiffs through their undersigned counsel  
18 and submit the within Points and Authorities in Opposition to  
19 Defendant's motion under CCP § 2019(b)(1) for Protective Order,  
20 seeking to quash certain noticed depositions of the Custodian  
21 of Records of financial institutions in the City of San Francisco  
22 and seeking sanctions.

23 The gist of this action turns on the acts of defendant,  
24 an attorney, in exploiting his prior confidential relationship  
25 with plaintiff for personal gain.

26 The records sought will demonstrate (1) that defendant

BB- 31-b-165

GARRY, DREYFUS, McTERNAN, BROTSKY,  
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1 enjoyed the confidence and trust of plaintiffs to the extent that  
2 defendant was entrusted with the most intimate and vulnerable  
3 aspects of plaintiffs' financial affairs while defendant was acting  
4 as counsel for plaintiffs and (2) that even before the events  
5 alleged in the complaint had occurred, defendant abused his  
6 position of trust and confidence for his personal gain.

7 The evidence sought by the noticed depositions is thus  
8 relevant and likely to lead to relevant evidence.

9 It is relevant directly to the issue of defendant's  
10 unlawful intentions respecting his future exploitation of his  
11 position of trust and confidence.

12 The records sought to be obtained may also lead to the  
13 discovery of relevant evidence in that any deposition of defendant  
14 Stoen can not be properly prepared without the records sought in  
15 the noticed depositions which are subject to this motion.

16 This latter purpose also disposes of defendant's  
17 suggestion that the court control the order of discovery and force  
18 plaintiffs to await completion of discovery on the liability case  
19 before seeking these records. The records are essential to plain-  
20 tiffs' proper preparation of the case on liability.

21 There's no question that evidence of prior acts is  
22 admissible to show a subsequent intention. Evidence Code § 1101(b)  
23 1104, 1105; People v. Alcalde, 24 C.2d 177, 185 (1944), Scott v.  
24 Times-Mirror Co., 181 Cal. 345 (1919), Wright v. Rogers, 172  
25 C.A.2d 349, 363 (1959), State Rubbish Collectors Assoc. v.  
26 Siliznoff, 38 C.2d 330, 339 (1952).

GARRY, DREYFUS, McTERNAN, BROTSKY,  
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1 Code of Civil Procedure § 2019(b)(1), under which defend-  
2 ant brings the instant motion, requires that whether the motion be  
3 made by the party, the deponent, or the court itself, in each case  
4 the motion may only be granted "for good cause shown."

5 The accompanying Declaration of Charles R. Garry, esta-  
6 blishes that the depositions which are subject to the motion are  
7 brought in good faith for the purpose of properly preparing the  
8 instant case, and not for collateral purposes. Defendant has made  
9 no showing of good case and presented nothing except intemperate  
10 speculation respecting the plaintiffs' motives. Such matter,  
11 verging on the contumacious, can not support the drastic relief  
12 defendant now seeks.

13 Dated: November 2, 1978

14 Respectfully submitted,

15 GARRY, DREYFUS, McTERNAN, BROTSKY,  
16 HERNDON & PESONEN, INC.

17 By Charles R Garry  
18 CHARLES R. GARRY  
19 Attorney for Plaintiffs  
20  
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22  
23  
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26



1 the records sought to be suppressed by the present motion.

2 Executed on November 2, 1978 at San Francisco, California

3 I declare under penalty of perjury that the foregoing is  
4 true and correct.

5 Dated: November 3, 1978

6  
7  
8 By Charles R. Garry  
9 CHARLES R. GARRY  
10 Attorney for Plaintiffs  
11  
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GARRY, DREYFUS, MERTZMAN, BROTSKY,  
HERNDON & PESONEN, INC.  
1286 MARKET STREET AT CIVIC CENTER  
SAN FRANCISCO, CALIFORNIA 94102  
TEL. 8643131

DECLARATION OF PERSONAL SERVICE (CCP § 415.10)

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I, LOUISE HARDY, under penalty of perjury, hereby declare that I am and was on the dates herein mentioned, a citizen of the United States, over the age of eighteen years, and not a party to this action; that I caused the within Declaration and Plaintiffs' Memorandum of Points and Authorities in Opposition to Defendant's Motion for Protective Order on the following person(s) on the date and at the address set forth below.

Patrick Sarsfield Hallinan  
Hallinan & Blum  
345 Franklin Street  
San Francisco, CA. 94102

Executed on November 3, 1978, at San Francisco, California.

By *Louise Hardy*  
LOUISE HARDY

GARRY, DREYFUS, McTERNAN, BROTSKY,  
HERNDON & PESONEN, INC.  
1358 MARKET STREET AT CIVIC CENTER  
SAN FRANCISCO, CALIFORNIA 94102  
TEL: 664-3131

SAN FRANCISCO, CALIFORNIA 94102  
TEL: 864-3131

1 NO. \_\_\_\_\_

2

3 IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

4 SECOND APPELLATE DISTRICT

5 DIVISION \_\_\_\_\_

6 JAMES WARREN JONES, also known as )  
7 JIM JONES; PEOPLES TEMPLE OF THE )  
8 DISCIPLES OF CHRIST, a non-profit )  
9 corporation; ENOLA M. NELSON; HUGH )  
10 FORTSYN; and JAMES MC ELVANE, )  
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Petitioners,

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11 THE SUPERIOR COURT OF THE STATE OF )  
12 CALIFORNIA IN AND FOR THE )  
13 COUNTY OF LOS ANGELES, )

13

Respondent,

14

[WADE B. MEDLOCK and MABEL M. MEDLOCK,

15

Real Parties In Interest.]

16

17

PETITION FOR WRIT OF MANDATE  
AND

18

MEMORANDUM OF POINTS AND AUTHORITIES

19

Motion to Vacate the Judgment of the  
Superior Court of the State of California in  
and for the City and County of Los Angeles

20

21

CHARLES R. GARRY

22

GARRY, DREYFUS, McTERNAN,  
BROTSKY, HERNDON & PESONEN, INC  
1256 Market Street  
San Francisco, CA. 94102

23

24

Telephone: (415) 864-3131

25

Attorneys for Petitioners

26

BB-31-b-171

1 NO. \_\_\_\_\_

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3

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

4

SECOND APPELLATE DISTRICT

5

DIVISION \_\_\_\_\_

6

JAMES WARREN JONES, also known as )  
JIM JONES; PEOPLES TEMPLE OF THE )  
7 DISCIPLES OF CHRIST, a non-profit )  
corporation; ENOLA M. NELSON; HUGH )  
8 FORTSYN; and JAMES MC ELVANE, )

9

Petitioners, )

10

vs. )

11

THE SUPERIOR COURT OF THE STATE )  
OF CALIFORNIA IN AND FOR THE COUNTY )  
12 OF LOS ANGELES, )

13

Respondent, )

14

[WADE B. MEDLOCK and MABEL M. MEDLOCK, )

15

Real Parties In Interest.] )

16

17

PETITION FOR WRIT OF MANDATE  
AND  
MEMORANDUM OF POINTS AND AUTHORITIES

18

19

The Petitioners petition this Court for a Writ of  
Mandate directed to the Respondent Superior Court In and For The  
County of Los Angeles, and by this petition allege:

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1. Beneficial Interest of Petitioners

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The Petitioners are defendants in a cause which was  
commenced in the Superior Court of the State of California in and  
for the County of Los Angeles entitled WADE B. MEDLOCK and

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TEL: 863131



SAN FRANCISCO, CALIFORNIA 94102  
TEL: 864-3131

1 MABEL M. MEDLOCK, husband and wife v. JAMES WARREN JONES, also known  
2 as JIM JONES; PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST, a nonprofit  
3 corporation; ENOLA M. NELSON; ENOLA M. NELSON REALTY; HUGH FORTSYN;  
4 JAMES MC ELVANE, and FIRST DOE through FIFTIETH DOE, inclusive,  
5 (Los Angeles County Superior Court No. C24-3292); and seek relief  
6 from the Respondent Superior Court's order dismissing the Petition-  
7 ers' motion for change of venue.

8 2. Capacity of Respondent

9 The Respondent is and has at all times mentioned herein  
10 been a Superior Court of the State of California and was the  
11 forum in which the Petitioners moved for a change of venue in the  
12 aforesaid action No. C24-3292, WADE B. MEDLOCK and MABEL M. MEDLOCK  
13 v. JAMES WARREN JONES and Others.

14 3. Beneficial Interest of the Real Parties In Interest

15 The Real Parties In Interest are and have at all material  
16 times been the Plaintiffs in the aforesaid action No. C24-3292,  
17 WADE B. MEDLOCK and MABEL M. MEDLOCK v. JAMES WARREN JONES and  
18 Others.

19 4. Statement of Facts

20 On September 1, 1978 Petitioners filed a motion in the  
21 Respondent Superior Court for a change of place of trial of the  
22 aforesaid action No. C24-3292 entitled WADE B. MEDLOCK and MABEL M.  
23 MEDLOCK v. JAMES WARREN JONES and Others on the grounds that,  
24 pursuant to the provisions of the California Code of Civil  
25 Procedure relating to the place of trial of civil actions, the  
26 Respondent Superior Court in and for the County of Los Angeles

1 was an improper court for the trial of the said action, and the  
2 Superior Court of the State of California In and For the County  
3 of San Francisco was and is a proper court. (Exhibit "A".)

4           On October 6, 1978 the Petitioners' said motion was heard  
5 and dismissed by the Honorable Jess Whitehill, Judge Pro tem in  
6 Department 88A of the Respondent Court. Notice of the Respondent  
7 Court's order dismissing the Petitioners' motion was received by  
8 the Petitioners on October 20, 1978.

9 5. Basis for Relief: By virtue of the provisions of the Califor-  
10 nia Code of Civil Procedure relating to place of trial of civil  
11 actions and the facts made known to the Respondent Court by the  
12 Petitioners in their said motion for change of venue, the Respond-  
13 ent Court erroneously determined that the Superior Court In and  
14 For The County of Los Angeles is a proper forum for the trial of  
15 the said action No. C24-3292.

16           Respondent Court has a clear and present judicial duty to  
17 order that the place of trial of the said action No. C24-3292 be  
18 changed from the Superior Court In and For the County of Los  
19 Angeles to the Superior Court In and For The County of San Fran-  
20 cisco by reason of §§ 395, 397, and 398 of the California Code of  
21 Civil Procedure.

22 6. The Petitioners have performed all conditions precedent to  
23 the filing of this petition by moving for a change of venue in the  
24 Respondent Court on October 6, 1978, which motion was dismissed as  
25 aforesaid.

26 7. This petition is made to this Honorable Court in the first

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TEL. 864-3131

1 instance rather than to the Superior Court of the State of  
2 California, County of Los Angeles, for the following reason,  
3 namely, that pursuant to § 400 of the California Code of Civil  
4 Procedure the appropriate and sole method of obtaining relief from  
5 the Respondent Court's order denying their motion for change of  
6 venue is by way of a petition to the Court of Appeal for the  
7 district in which the Respondent Court is situated for a Writ of  
8 Mandate requiring trial of the case in the proper court.

9 WHEREFORE, the Petitioners pray that:

10 1. An alternative Writ of Mandate issue under the seal of  
11 this Honorable Court commanding the Respondent Superior Court  
12 In and For The County of Los Angeles, its officers, agents, and  
13 all other persons acting on its behalf or through its orders to  
14 vacate its said order of October 6, 1978 dismissing the Petition-  
15 ers' motion for change of venue and to order that the trial of the  
16 said action No. C24-3292 between the Real Parties In Interest  
17 herein as Plaintiffs and the Petitioners herein as Defendants be  
18 transferred to the Superior Court of the State of California In and  
19 For The County of San Francisco, or to show cause before this  
20 Honorable Court at a time and place then or thereafter specified  
21 by court order, why a peremptory writ should not issue;

22 2. That on the return of the alternative writ and the  
23 hearing of this petition, this Honorable Court issue its peremptory  
24 writ of mandate commanding the Respondent Superior Court, its  
25 officers, agents and all other persons acting on its behalf or  
26 through its orders to vacate its said order of October 6, 1978 and

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1 to order that the trial of the said action No. C-24-3292 be  
2 transferred to the Superior Court of the State of California In  
3 and For The County of San Francisco;

4 3. For such other and further relief as this Honorable  
5 Court deems just and proper.

6 Dated: October 27, 1978

7  
8 GARRY, DREYFUS, McTERNAN, BROTSKY,  
HERNDON & PESONEN, INC.

9  
10 By Charles R Garry  
11 CHARLES R. GARRY  
12 Attorney for Petitioners

13 NEIL ROSENBAUM  
14 Barrister of Gray's Inn  
15 Attorney of New York and  
16 Pennsylvania Bars  
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1100 MARKET STREET, 21 CIVIL COURT  
SAN FRANCISCO, CALIFORNIA 94102  
TEL: 864-3131

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 STATEMENT OF FACTS

3 On or about June 7, 1978 the Real Parties in Interest to  
4 this petition filed a complaint in the Superior Court of the  
5 State of California in and for the County of Los Angeles against,  
6 inter alia, the Petitioners.

7 The said complaint alleges three causes of action. The  
8 first cause of action is an alleged conversion by the Petitioners  
9 and and an additional defendant, namely, Enola M. Nelson Realty,  
10 of property owned by the Real Parties in Interest. The second  
11 and third causes of action are alleged conspiracies by the Peti-  
12 tioners, with the exceptions of Enola M. Nelson and Hugh Fortsyn  
13 (in the third cause of action) intentionally to inflict emotional  
14 distress and mental suffering on the Real Parties in Interest.

15 On September 1, 1978 the Petitioners filed a Notice of  
16 Motion for Change of Venue in the Respondent Court. Filed with  
17 the said Notice of Motion were: (1) a Memorandum of Points and  
18 Authorities in Support of Motion for Change of Venue; (2) a Dec-  
19 laration of Merits and Residence in Support of Motion by James  
20 McElvane; and (3) a Declaration of Merits and Residence in  
21 Support of Motion by June Crym, Treasurer of the Peoples Temple  
22 of the Disciples of Christ (hereinafter referred to as the "Peoples  
23 Temple"). James McElvane's said Declaration was filed in the  
24 Respondent Court on September 26, 1978.

25 ///

26 ///

1 On or about October 1, 1978 the Real Parties in Interest  
2 filed "Plaintiffs' Points and Authorities in Opposition to Motion  
3 for Change of Venue."

4 At about 9:00 a.m. on October 6, 1978 the Respondent Court,  
5 The Honorable Jess Whitehill presiding, dismissed the Petitioners'  
6 said Motion in the absence of counsel for the Petitioners.  
7 (Counsel's absence was due solely to an unanticipated and un-  
8 controllable delay in air transport connections between San Fran-  
9 cisco and Los Angeles.)

10 Upon his appearance before the Respondent Court, Petition-  
11 ers' counsel was informed by the Learned Judge that the said motion  
12 had been dismissed on two grounds, namely, (1) that the Petition-  
13 ers had made no showing that Enola M. Nelson Realty was not a  
14 resident of Los Angeles County at the time the action was com-  
15 menced, and (2) that James McElvane did not state that he was a  
16 resident of San Francisco at the time the complaint was filed.

17 Petitioners' counsel made an oral motion to vacate the  
18 Respondent Court's ruling on the ground that, by reason of the  
19 matters aforesaid, he had had no opportunity for oral argument  
20 in support of the said motion for change of venue. Counsel in-  
21 vited the Respondent Court's attention to James McElvane's said  
22 amended Declaration of Merits wherein McElvane stated that at  
23 the time the action was commenced he was not a resident of Los  
24 Angeles County.

25 Petitioners' Counsel further invited the Respondent Court's  
26 attention to 5.10162 of the California Business and Professions

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TEL: 668-3131

1 Code and contended that, pursuant to the provisions of that section,  
2 the situs of the Defendant party Enola M. Nelson Realty was, on  
3 the facts before the Respondent Court, not Los Angeles County,  
4 but Guyana.

5 The Respondent Court denied Petitioners' Counsel's motion  
6 to vacate its ruling, and augmented its reasons for so ruling  
7 as follows: (1) that James McElvane's declaration that, inter alia,  
8 Enola M. Nelson resided in Guyana was inadmissible hearsay; and  
9 (2) that James McElvane was "involved" with Enola M. Nelson Realty  
10 at the time of the alleged conversion.

11 The proceedings were not reported.

12 ARGUMENT

13 THE PETITIONERS DISCHARGED THEIR BURDEN OF SHOWING  
14 THAT THE ACTION BROUGHT AGAINST THEM BY THE REAL  
15 PARTIES IN INTEREST WAS NOT PROPERLY TRIABLE IN  
16 LOS ANGELES COUNTY.

17 1. In the action brought against the Petitioners the Real  
18 Parties in Interest, joined as Defendants four (4) identified  
19 individuals (viz., James Warren Jones, High Fortsyn, Enola M.  
20 Nelson, and James McElvane), one corporation (People's Temple)  
21 and one party alleged in paragraph V.C of the Plaintiffs' Points  
22 and Authorities in Opposition to Motion for Change of Venue to  
23 constitute an unincorporated association for purposes of deter-  
24 mining venue.

25 2. The county in which the Defendants or some of them  
26 reside at the commencement of the action is the proper county for  
the trial of the action: California Code of Civil Procedure, §395.

1           Where a corporation is joined as defendant in an action,  
2 the county in which the corporation has its principal place of  
3 business is also a proper county for the trial of the action:  
4 California Code of Civil Procedure, § 395.5.

5           A similar rule applies to an unincorporated association,  
6 if it has filed a statement designating its principal office  
7 pursuant to Corporations Code § 24003: Ibid., §395.2.

8           In relation to corporations and unincorporated associations  
9 the California Code of Civil Procedure §395.5 further provides  
10 that an action may properly be tried in the county in which tort  
11 liability arises.

12           However, when a plaintiff brings an action against several  
13 defendants, both individual and corporate (or an unincorporated  
14 association), in a county which is neither the residence nor the  
15 principal place of business of any defendant, an individual has  
16 a right upon proper showing to a change of venue to the county  
17 of his residence, even though venue as initially laid may other-  
18 wise be justifiable on the ground that liability in tort is  
19 alleged to have arisen there: Mosby v. Superior Court, 43 Cal.App.  
20 3d 219, 117 Cal. Rptr. 588.

21           Consequently where Plaintiffs sue both individual defendants  
22 and a corporation and/or an unincorporated association, venue is  
23 restricted to (a) counties in which the individual defendants are  
24 resident, (b) counties in which the corporate defendant has its  
25 principal place of business, and (c) the county in which the  
26 unincorporated association has its principle place of business,



1 provided such association comes within the terms of § 395.2 of  
2 the Code of Civil Procedure.

3 3. The First Cause of Action.

4 The first cause of action in the said complaint alleges  
5 liability for conversion against individual defendants, a corpora-  
6 tion, and a party alleged to constitute an unincorporated associa-  
7 tion. By reason of the matters aforesaid, the action may properly  
8 be tried in Los Angeles County only if that County was, at the  
9 time the said action was commenced, the residence of at least  
10 one of the individual defendants or the principal place of business  
11 of the People's Temple, or the principal place of business of Enola  
12 M. Nelson Realty, if, as a matter of law, Enola M. Nelson Realty  
13 constituted an unincorporated association for purposes of deter-  
14 ming venue.

15 4. Residence of Individual Defendants at Commencement  
16 of Action.

17 None of the four said individual defendants was, at the  
18 material time, a resident of Los Angeles County.

19 On September 18, 1978 Petitioner James McElvane declared  
20 under penalty of perjury and as a matter of his own knowledge  
21 that at the time the said action was commenced James Warren Jones,  
22 Enola M. Nelson and Hugh Fortsyn were not residents of Los Angeles  
23 County. McElvane's Declaration was filed in the Respondent Court  
24 on September 26, 1978 and was before the Learned Judge at the  
25 hearing of the Petitioners' motion for change of venue.

26 ///

1 The Respondent Court expressly omitted to take the said  
2 Declaration into account in deciding the Petitioners' Motion on  
3 the erroneous ground that McElvane's said declaration as to the  
4 residence of Jones, Nelson and Fortsyn was inadmissible hearsay.  
5 The Learned Judge gave no reasons for excluding the said declara-  
6 tion as inadmissible hearsay.

7 By statute, an affidavit or declaration under penalty of  
8 perjury may be used upon a motion: C.C.P. § 2009.

9 In respect of a motion for a change of venue,

10 "There is no statutory requirement of an  
11 affidavit of residence. [But] C.C.P. 3966 provides  
12 that the court may order a change of venue if, 'upon  
13 the hearing,' it 'appears' that the action was brought  
14 in the wrong county. Perhaps the defendant may make  
15 his entire showing by oral testimony or exhibits.  
16 But the practice is to file an affidavit or affidavits  
17 showing that the moving defendant is a resident of the  
18 County to which transer is sought, or is not a resi-  
19 dent of the County in which the suit is brought."  
20 Witkin, California Procedure, (2d Ed.) Vol. 2, § 539,  
21 p. 1359.

22 Accordingly, if the Respondent Court based its ruling that  
23 McElvane's said declaration was inadmissible hearsay on the ground  
24 that residence or non-residence cannot properly be proved by  
25 affidavit (or declaration), then, for the foregoing reasons, the  
26 Respondent Court's ruling was in error.

Further or alternatively, if the Respondent Court based  
its ruling on the ground that James McElvane declaration was in-  
admissible hearsay insofar as it related to defendants other than  
heimselF, then the Respondent Court was again in error.

///

1           The Supreme Court of California has held that "one defendant  
2 in a personal action may make an affidavit as to the residence of  
3 all the defendants for their benefit on a motion for change of  
4 place of trial of the action; and such an affidavit is sufficient  
5 where it states that the residence of all the defendants was at  
6 the time of the commencement of the action and ever since has  
7 been in the county to which it is sought to move the action, even  
8 though the affidavit does not contain the negative averment that  
9 the defendants do not reside in the county where the action was  
10 brought." Stone v. Stone, 203 Cal. 197.

11           Moreover, "An affidavit showing that all defendants were  
12 residents of a particular county is prima facie proof of that  
13 fact in the absence of any denial or contrary proof." Fielder v.  
14 Superior Court of Shasta County, 213 Cal.App.2d 60.

15           The Real Parties in Interest have not at any time denied  
16 that Petitioners James Warren Jones, Hugh Fortsyn, and Enola  
17 M. Nelson were not residents of Los Angeles County at the time  
18 this action was commenced.

19           The Petitioners concede that the Real Parties in Interest,  
20 in Paragraph VI of their "Points and Authorities in Opposition  
21 to Motion for Change of Venue," deny that Petitioner James McElvane  
22 was not resident of Los Angeles County at the material time,  
23 notwithstanding his said declaration to the contrary; but, to  
24 the Petitioners' knowledge and belief, the Real Parties in Interest  
25 have made no more than a bare denial, and at no time did they  
26 adduce before the Respondent Court any evidence to substantiate

1 their bare assertion that at the material time James McElvane  
2 was, in fact, a resident of Los Angeles County. No counter-affi-  
3 davits were filed by the Real Parties in Interest; nor, despite  
4 their assertion that "at the hearing herein [they] will present  
5 proof" that McElvane was a resident of Los Angeles County, and  
6 the Real Parties in Interest present such proof. Alternatively,  
7 if such proof was presented to the Respondent Court at the hearing  
8 of the Petitioners' motion, the record of the Respondent Court,  
9 as known to the Petitioners, is silent about it, and it was, in  
10 any event, presented in the absence of the Petitioners' counsel.  
11 Accordingly, the Petitioners were denied any opportunity to deal  
12 with such alleged proof.

13 By reason of the matters and authorities aforesaid, the  
14 Petitioners respectfully submit that the burden of showing non-  
15 residence in Los Angeles County of each of the four said indivi-  
16 dual Defendants to this action was duly and sufficiently discharged  
17 at the time the Petitioners' motion for change of venue was heard  
18 by the Respondent Court, and that the Respondent Court therefore  
19 erred in its ruling as to the residence(s) of Petitioners Jones,  
20 Fortsyn, Nelson and McElvane at the commencement of this action.

21 In the Petitioners' respectful submission, the Respondent  
22 Court erred if, insofar as it denied the Petitioners' Motion for  
23 Change of Venue on the ground of residence in Los Angeles County  
24 of any of the said individual Defendants.

25 ///

26 ///



1 6. The Status for Venue Purposes of Enola M. Nelson Realty.

2 (a) If, at the material time, Enola M. Nelson Realty  
3 had been a corporation with its principal place of business in  
4 Los Angeles County, then Los Angeles County would be a proper  
5 place for the trial of this action: California Code of Civil  
6 Procedure, Sec. 395.5.

7 Enola M. Nelson Realty was not, however, a corporation  
8 at the time of commencement of this action or at any time. The  
9 Real Parties in Interest have not disputed that fact. Accordingly  
10 venue in Los Angeles County cannot validly be based on Sec. 395.5  
11 of the said Code.

12  
13 (b) If, at the time of commencement of this action,  
14 Enola M. Nelson Realty had been an unincorporated association  
15 which had "filed a statement with the Secretary of State pursuant  
16 to Section 24003 of the Corporations Code listing its principal  
17 office in this state," then the county in which Enola M. Nelson  
18 Realty had its principal office would be a proper place for  
19 trial of the action: California Code of Civil Procedure,  
20 Sec. 395.2.

21 For purposes of this Petition, the Petitioners concede  
22 that the principal office of Enola M. Nelson Realty was situated  
23 in Los Angeles County. Nevertheless:

24 "Section 395.2 does not apply unless the  
25 association ... has filed a statement  
26 designating its principal office in this  
State (in accordance with the) procedure  
for filing such a statement (as) prescribed  
by Corporations Code, Sec. 24003." 14 West's  
Annotated California Codes, Code of Civil Procedure  
Sec. 395.2, p. 329.

1 In the absence of such a statement an unincorporated  
2 association is not recognized as a jural entity for purposes  
3 of determining venue and may therefore be sued only in those  
4 counties where the plaintiff can sue the individual members of  
5 the association: Juneau Spruce Corp. v. Int'l. Longshoremen's  
6 Union, 37 Cal.2d 760, 235 P.2d 607 (1951).

7 Therefore, even if contrary to the Petitioners'  
8 contention, Enola M. Nelson Realty were an unincorporated as-  
9 sociation between Petitioners and McElvane within the meaning  
10 of Sec. 395.2 of the Code of Civil Procedure, by reason of the  
11 matters set out in this paragraph and in paragraph 4 hereinabove  
12 (relating to the residences of Enola M. Nelson and James McElvane),  
13 Enola M. Nelson Realty could not properly be sued in Los Angeles  
14 County, since no evidence has ever been produced, nor any  
15 suggestion ever made, by the Real Parties in Interest that  
16 a statement designating principal office in California was  
17 filed on behalf or in respect of Enola M. Nelson Realty prior to  
18 the commencement of this action.

19 Accordingly, even if, contrary to the Petitioners'  
20 contention, Enola M. Nelson Realty were an unincorporated  
21 association within the meaning of Sec. 395.2, venue in Los  
22 Angeles County would be improper.

23  
24 (c) Further or in the alternative, "Enola M. Nelson  
25 Realty" is not an association at all, but merely a trade name  
26 under which Petitioner Enola M. Nelson conducts the real estate

1 brokerage business of which she is the sole proprietor and in  
2 which she is the sole participant.

3 Paragraph 4 of the complaint of the Real Parties in  
4 Interest alleges no more than that Petitioner McElvane was at  
5 the material time a licensed real estate salesman doing business  
6 for, inter alia, Enola M. Nelson Realty. In Paragraph V of their  
7 Memorandum of Points and Authorities in Opposition to Motion  
8 for Change of Venue the Real Parties in Interest contend that  
9 their allegations in said paragraph 4 are sufficient to establish  
10 that Enola M. Nelson Realty "is an organization of two or more  
11 persons (i.e. Enola M. Nelson and James McElvane) and an  
12 association within the meaning of Section 395.5 of the Code of  
13 Civil Procedure."

14 In the Petitioners' respectful submission, the said  
15 allegations are insufficient for such purposes. Even if, which  
16 has not been admitted by the Petitioners, James McElvane was  
17 "doing business as a salesman for ... Enola M. Nelson Realty"  
18 at the material time, that fact would not bring Enola M. Nelson  
19 Realty within the ambit of the terms "unincorporated association"  
20 or "organization" as those terms have been construed by the  
21 Appellate Courts of this state.

22 The Supreme Court of California has held that the usual  
23 meaning of the term "association" is

24 "an unincorporated organization,  
25 composed of a body of men partaking  
26 in its general form and mode of  
procedure of the characteristics of  
a corporation." In re Irwin's Estate,  
327 P. 1074, 196 C. 366.



1           The Court of Appeal subsequently applied the abovesaid  
2 definition and noted that the term "association" "is often used  
3 as synonymous with 'company' or 'society.'" Law v. Crist, 107 P.2d  
4 953, 41 C.A.2d 862.

5           The Petitioners submit that, even assuming the  
6 allegations made in said paragraph 4 of the said complaint to be  
7 true, the Respondent court could not reasonably have concluded  
8 as a matter of legal construction that Enola M. Nelson Realty  
9 was an unincorporated association at the material time.

10           The Respondent Court must, however, have assumed or  
11 concluded that Enola M. Nelson Realty was an unincorporated  
12 association (or a corporation) in order to have dismissed the  
13 Petitioners' motion on the ground, inter alia, that the defendants  
14 made no showing that Enola M. Nelson Realty was not a resident  
15 of Los Angeles County at the time the action was commenced.

16           By reason of the matters aforesaid, the Respondent  
17 Court erred in its ruling that venue in Los Angeles County was  
18 proper by virtue of the location in Los Angeles of Enola M.  
19 Nelson Realty's brokerage office.

20  
21 7. The Petitioners respectfully submit that with regard to the  
22 first cause of action the Respondent Court could not  
23 reasonably have found any ground for deciding that Los  
24 Angeles County was a proper place of trial since:

25           (a) The Petitioners adduced sufficient admissible  
26 evidence which established that none of the four named individual

1 Defendants was a resident of Los Angeles County at the material  
2 time;

3 (b) The Real Parties in Interest did not dispute the  
4 fact that at the material time the principal place of business  
5 of the People's Temple was San Francisco County; and

6 (c) Enola M. Nelson Realty was either not an unincor-  
7 porated association at all, or, if it was an unincorporated  
8 association, it was not at the material time a jural entity for  
9 purposes of determining venue within the ambit of Sec. 395.2  
10 of the Code of Civil Procedure.

11 In the premises, the Respondent Court erred in its  
12 ruling on the Petitioners' motion.

13  
14 8. The Second and Third Causes of Action.

15 The second and third causes of action in the said  
16 complaint allege liability for intentional infliction of emotional  
17 distress and mental suffering against the People's Temple and  
18 Petitioners Jones, McElvane and Fortsyn.

19 Petitioner Enola M. Nelson and Enola M. Nelson Realty  
20 are expressly excluded as defendant parties to the second and  
21 third causes of action. No allegations are made against  
22 Petitioner Fortsyn in respect of the third cause of action.

23 9. Venue with Respect to the Second and Third Causes of Action.

24 Pursuant to Sections 395 and 395.5 of the Code of Civil  
25 Procedure, the said second cause of action can properly be tried  
26 in Los Angeles County only if at least one of the Petitioners

1 Jones, Fortsyn and McElvane was resident there when the action  
2 was commenced, or if the principal place of business of the  
3 People's Temple was in Los Angeles County at that time.

4 The said third cause of action can properly be tried  
5 in Los Angeles County only if, at the material time, either  
6 Petitioner Jones or McElvane resided there, or the People's Temple  
7 had its principal place of business in that county.

8 (a) The Petitioners repeat the matters and authorities  
9 set out in paragraph 4 hereinabove.

10 By reason of those matters and authorities, the  
11 Petitioners submit that they duly and sufficiently discharged  
12 their burden of establishing that at the time the said action  
13 was commenced neither James Warren Jones, nor Hugh Fortsyn, nor  
14 James McElvane was a resident of Los Angeles County. The  
15 Respondent Court therefore erred in ruling that the residence(s)  
16 of the said Petitioners were not shown to have been other than  
17 Los Angeles County at that time and that for that reason the  
18 Petitioners' motion for change of venue with regard to the  
19 second and third causes of action must be denied.

20 (b) The Petitioners repeat the matters set out in  
21 paragraph 5 hereinabove. The Petitioners properly and sufficiently  
22 established at the hearing in the Respondent Court that the  
23 principal place of business of the People's Temple was San  
24 Francisco County at all material times.

25 In the premises, neither the second nor the third causes  
26 of action can properly be tried in Los Angeles County. The

1 Petitioners are therefore entitled to a change of venue in  
2 respect of those causes of action.

3  
4 10. Joinder of Transitory Actions.

5 The instant action by the Real Parties in Interest  
6 against the Petitioners is one in which three (3) transitory  
7 counts or claims for transitory relief are joined. If, in such  
8 cases, defendants are entitled to a change of venue to a residence  
9 county in respect of any one count or cause of action, then a  
10 motion to change venue as to the entire action will lie even  
11 though the defendants may not be entitled to such change in  
12 respect of other counts:

13 "When several causes of actions are alleged in  
14 a complaint, a motion for change of venue must  
15 be granted on all causes if defendant is entitled  
16 to a change on any one." Quick v. Corsaro, 180 C.A.2d  
17 831, 835; Johnson v. Superior Court, 232 C.A.2d 212, 217.

18 "... if in (an action joining several transitory  
19 counts) the non-residence county in which the  
20 action was commenced is improper venue with  
21 respect to one of the counts, even though good  
22 as to the rest, the entire action will be  
23 transferred on motion to the county of a  
24 defendant's residence..." Chadbourn, Grassman, &  
25 Van Alstyne, 1 California Pleading, S. 386, p. 349,  
26 citing Pacific Bal. Industries v. Northern Timber,  
118 C.A.2d 815, 259 P.2d 465; Crofts and Anderson v.  
Johnson, 101 C.A.2d 418, 225 P.2d 594; Goosen v.  
Clifton, 75 C.A.2d 44, 170 P.2d 104.

23 11. Since the Petitioners were entitled, by reason of the  
24 matters set out in paragraph 9 hereinabove, to a change of  
25 venue with respect to the second and third causes of action in  
26 the said complaint, they were equally entitled to a change of

1 venue with respect to the entire action against them. The  
2 Petitioners respectfully submit that this is so entirely  
3 apart from the matters set out in paragraph 3 through 7,  
4 inclusive hereinabove.

5 For these reasons, in addition to those set out in  
6 paragraphs 3 through 7 hereinabove, the Respondent Court's  
7 denial of the Petitioners' motion for a change of venue was in  
8 error.

9 CONCLUSION

10 For the foregoing reasons, the Petitioners respectfully  
11 urge this Honorable Court to grant a writ of mandate requiring  
12 the Respondent Court to order that the trial of the instant  
13 action be transferred from Los Angeles County to San Francisco  
14 County.

15 DATED: October 27, 1978

Respectfully submitted,

16 CHARLES R. GARRY  
17 GARRY, DREYFUS, McTERNAN, BROTSKY,  
18 HERNDON & PESONEN, INC.

19 By

*Charles R. Garry*  
CHARLES R. GARRY  
Attorneys for Petitioners

20  
21 NEIL ROSENBAUM  
22 Barrister of Gray's Inn  
23 Attorney of New York and  
24 Pennsylvania Bars.

PROOF OF SERVICE BY MAIL---1013(a), 2015.5 C.C.P.

I am a citizen of the United States; my business address is 1256 Market Street at Civic Center, San Francisco 94102. I am employed in the City and County of San Francisco, where this mailing occurs; I am over the age of eighteen years and not a party to the within cause. I served the within

Petition for Writ of Mandate and  
Memorandum of Points and Authorities

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States Post Office mail box at San Francisco, California, addressed as follows:

Timothy Oliver Stoen  
120 Montgomery Street  
Suite 1700  
San Francisco, CA. 94104

Clerk of the Superior Court  
of Los Angeles County  
P. O. Box 151  
Los Angeles, CA. 90053

I certify or declare under penalty of perjury that the foregoing is true and correct. Executed on October 27, 1978 at San Francisco, California.

\_\_\_\_\_  
Signature

BB-31-b-194

ORIGINAL FILED

SEP 1 1978

COUNTY CLERK

1 CHARLES R. GARRY  
2 GARRY, DREYFUS, McTERNAN, BROTSKY,  
3 HERNDON & PESONEN, INC.  
4 1256 MARKET STREET AT CIVIC CENTER  
5 SAN FRANCISCO, CALIFORNIA 94102  
6 TEL: 864-3131

7 Attorneys for Defendants  
8 People's Temple of the Disciples  
9 of Christ, a nonprofit corporation,  
10 and James McElvane

11 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 IN AND FOR THE COUNTY OF LOS ANGELES

13 WADE B. MEDLOCK AND MABEL M.  
14 MEDLOCK, husband and wife,

NO. C243292

15 Plaintiffs,

16 vs.

17 JAMES WARREN JONES, also known  
18 as JIM JONES; PEOPLES TEMPLE  
19 OF THE DISCIPLES OF CHRIST, a  
20 nonprofit corporation; ENOLA M.  
21 NELSON; ENOLA M. NELSON REALTY;  
22 HUGH FORTSYN; JAMES McELVANE; AND  
23 FIRST DOE through FIFTIETH DOE,  
24 inclusive,

NOTICE OF MOTION  
FOR CHANGE OF VENUE  
[CCP § 397(1)]

Dept: Law and Motion  
Time: 9:00 A.M.  
Date: October 6, 1978

25 Defendants.

26 TO EACH PARTY AND TO THE ATTORNEY OF RECORD FOR EACH PARTY:

27 YOU AND EACH OF YOU WILL PLEASE TAKE NOTICE THAT on  
28 October 6, 1978, at the hour of 9:00 A.M., or as soon thereafter  
29 as the matter may be heard, in the Law and Motion Department of  
30 the above-entitled Court, at 111 N. Hill Street, Los Angeles,  
31 California, defendant James McElvane will move for an order  
32 changing the place of trial of this action to the Superior Court

195  
BB-31-6-195  
-1- EXHIBIT "A"

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1 of the State of California in and for the City and COUNTY CLERK  
2 San Francisco.

3 Said motion will be based on this notice of motion, the  
4 attached declarations under penalty of perjury of June Crym and  
5 James McElvane, the attached memorandum of points and authorities,  
6 such supplemental affidavits, declarations and memoranda of points  
7 and authorities as may be filed subsequently herein, and such oral  
8 and documentary evidence as may be presented at the hearing of this  
9 motion.

10 Dated: August 28, 1978

GARRY, DREYFUS, McTERNAN, BROTSKY,  
HERNDON & PESONEN, INC.

11  
12  
13 By Charles R. Garry  
14 CHARLES R. GARRY  
15 Attorney for Defendants  
16  
17  
18  
19  
20  
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26

BB-31-b-196



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SEP 1 1978  
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1 CHARLES R. GARRY  
2 GARRY, DREYFUS, McTERNAN, BROTSKY,  
3 HERNDON & PESONEN, INC.  
4 1256 MARKET STREET AT CIVIC CENTER  
5 SAN FRANCISCO, CALIFORNIA 94102  
6 TEL: 864-3131

7 Attorneys for Defendants  
8 People's Temple of the Disciples  
9 of Christ, a nonprofit corporation,  
10 and James McElvane

11 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 IN AND FOR THE COUNTY OF LOS ANGELES

13 WADE B. MEDLOCK AND MABEL M.  
14 MEDLOCK, husband and wife,

15 Plaintiffs,

NO. C243292

16 vs.

17 JAMES WARREN JONES, also known  
18 as JIM JONES; PEOPLES TEMPLE  
19 OF THE DISCIPLES OF CHRIST, a  
20 nonprofit corporation; ENOLA M.  
21 NELSON; ENOLA M. NELSON REALTY;  
22 HUGH FORTSYN; JAMES McELVANE; AND  
23 FIRST DOE through FIFTIETH DOE,  
24 inclusive,

MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
MOTION FOR CHANGE OF VENUE  
Department: Law & Motion  
Time: 9:00 A.M.  
Date: October 6, 1978

25 Defendants.

26 I. WHEN A PLAINTIFF BRINGS A TORT ACTION AGAINST SEVERAL  
DEFENDANTS, BOTH INDIVIDUAL AND CORPORATE, IN A COUNTY WHICH  
IS NEITHER THE RESIDENCE NOR THE PRINCIPAL PLACE OF BUSINESS  
OF ANY DEFENDANT, NOR A COUNTY IN WHICH INJURY TO PERSON OR  
PROPERTY OCCURRED, AN INDIVIDUAL DEFENDANT HAS A RIGHT TO A  
CHANGE OF VENUE, EVEN THOUGH VENUE AS INITIALLY LAID MAY  
OTHERWISE BE JUSTIFIABLE IN AN ACTION AGAINST THE CORPORATION

Griffin & Skelly Co. v. Magnolia & Healdsburg Fruit  
Cannery Co., 107 Cal. 378 (1895)

Carruth v. Superior Court, 80 C.A.3d 215, 220 (1978)

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SEP 1 1978

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1 Mosby v. Superior Court, 43 C.A.3d 219, 226 (1974)

2 CCP § 395.

3 II. UNDER THE CIRCUMSTANCES OUTLINED IN SECTION I ABOVE, AN  
4 INDIVIDUAL DEFENDANT IS ENTITLED TO A CHANGE OF VENUE TO THE  
5 PRINCIPAL PLACE OF BUSINESS OF THE CORPORATE DEFENDANT.

6 United Pac. Ins. Co. v. Superior Court,  
7 254 C.A.2d 897, 899 (1967)

8 Walker v. Wells Fargo Bank & Union Trust Co.,  
9 24 C.A.2d 220, 222-223 (1937)

10 CCP § 395.

11 III. DEFENDANT McELVANE IS ENTITLED TO A CHANGE OF VENUE TO THE  
12 CITY AND COUNTY OF SAN FRANCISCO BECAUSE NONE OF THE DEFEND-  
13 ANTS ARE RESIDENTS OF LOS ANGELES AND NO INJURY TO PERSON OR  
14 PERSONAL PROPERTY WITHIN THE MEANING OF CCP § 395 OCCURRED  
15 WITHIN THAT COUNTY, AND BECAUSE SAN FRANCISCO IS THE PRINCIPAL  
16 PLACE OF BUSINESS OF PEOPLE'S TEMPLE OF THE DISCIPLES OF  
17 CHRIST AND THE COUNTY OF RESIDENCE OF JAMES McELVANE.

18 The complaint in the above-entitled action contains one  
19 cause of action for conversion and two for infliction of emotional  
20 distress. None of these causes of action are for injury to person  
21 or personal property within the meaning of CCP § 395.

22 The words "injury to person or property" as used in  
23 CCP § 395 are limited to physical or corporeal injury. California  
24 courts have frequently held that conversion is not the sort of  
25 injury encompassed by that phrase.

26 Spangenberg v. Spangenberg, 123 C.A. 387, 391 (1932)

Haurat v. Superior Court, 241 C.A.2d 330 (1966)

Thus, the first cause of action is not one for injury to person or  
personal property within the meaning of CCP § 395.

Similarly, the courts have held that a cause of action for  
infliction of emotional distress is not a cause of action for

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1 injury to person. This is true even where the complaint alleges  
2 some physical injury.

3 Lucas v. Lucas Ranching Co., 18 C.A.2d 453 (1937)

4 The Court explained the rationale for this rule as follows:

5 ...the inspiration for the language we are  
6 considering was the 'situation brought about  
7 by the increasing use of motor vehicles.' In  
8 motor vehicle accidents, as in other cases  
9 where physical injury is directly caused by  
10 what has happened, the injury occurs at the  
11 place where the happening occurs, and there  
12 is logic in having that place a proper one  
13 for the trial. In an action such as plaintiff's,  
14 however, the place where the injury occurs is  
15 not the locale of the events which, ultimately,  
16 cause the injury. She is injured not at the  
17 site of the events, but, brooding over the  
18 wrongs done her, at the place or places where  
19 worry and loss of sleep finally take their toll.  
20 No reason appears why an injury which has no  
21 definite situs should be given potency in  
22 determining the place of trial.

23 Id. at 456, quoted in Carruth, supra., at 219-220.

24 Thus, plaintiffs' allegations of emotional and physical distress  
25 and injury in mind and body as a result of defendants' actions  
26 are insufficient to bring the second and third causes of action  
within the "injury to person or personal property" requirement of  
CCP § 395.

Since none of the causes of action are for injury to person  
or personal property, the action must be tried in the county of  
residence or principal place of business of one of the defendants.

Griffin & Skilly Co., supra.; CCP § 395(a).

But none of the defendants resides in the County of Los Angeles.  
See Declarations of Crym and McElvane. Therefore, defendant

TEL: 844-3131

1 McElvane's motion for change of venue to San Francisco, his resi-  
2 dence and the principal place of business of defendant People's  
3 Temple, must be granted.

4 In this case none of the causes of action is triable in  
5 Los Angeles County. But it should be noted that defendant's  
6 motion would have to be granted even if he was entitled to a change  
7 of venue for only one of these causes.

8 Johnson v. Superior Court, 232 C.A.2d 212 (1965)

9 Sanborn v. Pomona Pump Co., 131 C.A. 241 (1933).

10 CONCLUSION

11 For all of the reasons stated above, defendant's motion for  
12 change of venue must be granted.

13 Dated: August 28, 1978

14 Respectfully submitted,

15 GARRY, DREYFUS, McTERNAN, BROTSKY,  
16 HERNDON & PESONEN, INC.

17  
18 By Charles R. Garry  
19 CHARLES R. GARRY  
20 Attorney for Defendants  
21  
22  
23  
24  
25  
26

TEL: 884-3131

 **Bank of Montreal**  
(California)  
233 CALIFORNIA STREET  
SAN FRANCISCO, CALIF. 94104

C 36529

Dec. 16, 19 77 <sup>11-3</sup>  
1210

PAY TO THE ORDER OF Apostolic Corporation

\*\*\*0.92\*\*\*  
\$

BK. OF MONTREAL (CALIFORNIA) **0 AND 92 CTS**

DOLLARS  
AUTHORIZED SIGNATURE

**CASHIER'S CHECK**  
SAVINGS QUARTERLY INTEREST

*Klein Milkey*

*Amelia C. Jalayan*

⑆036529⑆ ⑆1210⑆0003⑆ 01 200 500⑆ 10

 **Bank of Montreal**  
(California)  
233 CALIFORNIA STREET  
SAN FRANCISCO, CALIF. 94104

C 35977

September 30, 19 77 <sup>11-3</sup>  
1210

PAY TO THE ORDER OF -----APOSTOLIC CORPORATION-----

\$ \*\*\*30.78\*\*

BK. OF MONTREAL (CALIFORNIA) **30 AND 78 CTS**

DOLLARS

**CASHIER'S CHECK**

*Dyanne K. Lee*  
*M. Robrahn*

⑆035977⑆ ⑆1210⑆0003⑆ 01 200 500⑆ 10

I.C.# 660-152  
DAY AND NIGHT OFFICE

**Bank of America**  
NATIONAL TRUST & SAVINGS ASSOCIATION  
SAN FRANCISCO, CALIFORNIA

No. 0066 93036

DATE July 13, 1977

11-35/1210

PAY TO THE ORDER OF \*\*\*\*\* APOSTOLIC CORPORATION \*\*\*\*\* \$146.50\*\*\*\*\*

**Bank of America 146 dol's 50 cts**

DOLLARS

**CASHIER'S CHECK**

*P. Grohn*  
(ASST. CASHIER - MANAGER)

⑆093036⑆ ⑆1210⑆0035⑆ 00669⑆85100⑆

BB-31-b-201

QUARTERLY INT. ON SAVINGS  
ACCT. NO. Q02003-Q

 **Bank of Montreal**  
(California)  
233 CALIFORNIA STREET  
SAN FRANCISCO, CALIF. 94104

C 38388

September 29 1978 <sup>11-3</sup>/<sub>1210</sub>

PAY TO THE ORDER OF \*\*\*\*\*APOSTOLIC CORPORATION\*\*\*\*\* \$0.92\*\*\*

BK. OF MONTREAL (CALIFORNIA) AND 92 CTS

DOLLARS  
AUTHORIZED SIGNATURE

CASHIER'S CHECK

*Jo Lacy*  
*Walter L. Millan*

⑆038388⑆ ⑆⑆1210⑆0003⑆ 01 200 500⑆ 10

TREASURY  
FEDERAL SERVICE  
DIVISION OF DISBURSEMENT

BIRMINGHAM, ALABAMA

Check No. 95,892,132

SYMBOL 3498

**United States Treasury** 15-51  
000

DO NOT FOLD, STAPLE OR MUTILATE  
KNOW YOUR ENDORSEMENT - REQUIRE IDENTIFICATION



PAY TO THE

ORDER OF

MONTH DAY YEAR

03 28 78

12/76

APOSTOLIC CORPORATION

PO BOX 15156

SAN FRANCISCO CA 94115

94233310 F-1120 REF

FRESNO 94

DOLLARS CTS  
\$\*\*\*\*178 35

*Holler*  
REGIONAL DISBURSING OFFICER

⑆34980⑆

⑆0000⑆0051⑆ 958921326⑆



**STATE OF CALIFORNIA**  
SACRAMENTO

WARRANT NUMBER  
05327372

THE TREASURER OF THE STATE WILL PAY OUT OF THE

FUND NO. FUND NAME

084 BANK AND CORPORATION TAX

NO. DAY YR. 1211

05 31 78

TO  
APOSTOLIC CORP

DOLLARS CENTS  
\$\*\*\*\*\*240 95

IDENTIFICATION NO

*Walter L. Millan*  
IDENTIFICATION COPY

⑆1211⑆1342⑆ 053273727⑆

BB- 31-b-202



STATE OF CALIFORNIA  
**FRANCHISE TAX BOARD**  
 SACRAMENTO, CALIFORNIA 95857  
 TELEPHONE (800) 852 7050

726:LN:dw  
**NOTICE OF ACTION ON  
 CANCELLATION, CREDIT, OR REFUND**

7640140 AC5\*\*

DATE 05 31 78  
 CLAIM NUMBER  
 DATE OF CLAIM  
 AMOUNT CLAIMED \$  
 INCOME YEAR ENDED 01 31 77  
 STATUTE

APOSTOLIC CORPORATION  
 P. O. Box 15156  
 San Francisco, CA 94115

Refund is due to a duplicate collection of the amount due for  
 income year ended 06 76.

Serial No.	Date	PREVIOUSLY ASSESSED				Payments
		Tax/Fee	Prof. Tax	Penalty	Interest	
206626	08 15 77	\$	\$	\$	5.63	\$ 280.83
Fen Pmt	09 02 77			14.04		
255577	09 29 77				0.12	243.93
Total		\$	\$	\$ 14.04	\$ 5.75	\$ 524.76
Revised liability		\$ 280.83	\$	\$ 14.04	\$ 5.75	\$ 300.62
Cancellation		\$ 0.00	\$	\$ 0.00	\$ 0.00	\$
Overpayment						\$ 224.14
Interest allowed						\$ 16.81
Total amount due taxpayer						\$ 240.95
Amount credited against liability due:						
						\$ 0.00
Amount to be refunded						\$ 240.95

**YOUR RETURN REMAINS SUBJECT TO AUDIT.**

The amount to be credited or refunded is being recommended for approval as required by the Revenue and Taxation Code. When and if approved a warrant will be drawn and forwarded to you from the office of the State Controller for the amount subject to refund.

An appeal may be filed with the State Board of Equalization. See reverse side for appeal procedure.

BB-31-b-203

Internal Revenue  
Service Center

P.O. BOX 12586  
FRESNO, CA. 93778

05 942333410 02 7612 670 7739

APOSTOLIC CORPORATION  
PO BOX 15156  
SAN FRANCISCO, CA. 94115

Date of This Notice

OCT. 10, 1977

161

Employer Identification Number

94-2333410 05

9401

If you inquire about  
your account, please  
refer to these num-  
bers or attach this  
notice

Document Locator Number

94310-235-4000-7

Form Number Tax Period Ended

1120 DEC. 31, 1976

Balance Is Due By

OCT. 20, 1977

Request for Payment

The statement at the right shows that a payment is due on your account. Please make the payment by the due date shown above.

If our statement does not agree with your records, the information on the back of this notice will tell you what to do.

If we included any penalty or interest charges, an explanation will be found on the back. (Code numbers in the box at lower right will guide you to the explanations which apply.)

Make your check or money order payable to Internal Revenue Service for the adjusted balance due. Please show your employer identification number on your payment and mail it with this notice in the envelope enclosed for your convenience.

Thank you for your cooperation.

PLEASE ATTACH CHECK OR MONEY ORDER HERE.

CORPORATION INCOME TAX

Tax Statement

Total Tax on Return	\$	624.07
Total Credits	-----	624.07-
Plus Penalty*	-----	159.14
Plus Interest*	-----	18.44
Balance Due		
Due IRS	→ \$	177.58

Subtract Payments  
We Haven't Included \_\_\_\_\_  
Pay Adjusted

Balance Due \$ \_\_\_\_\_  
PENALTIES: 01...\$156.02 07.....\$3.12

\*See these code numbers  
on the back for  
an explanation of  
penalty or interest  
charges.

01-C7-09

FORM 4192 (Part 1) (Rev. 8-76)

STUB  
10 05

1998

VERIFICATION STUB  
#94-2333410 05

0271 41998

February 1, 1978

AMOUNT \$ 177.58

CASHIER'S CHECK  
DRAWN ON

Fillmore-Post Office

Bank of America  
NATIONAL TRUST ASSOCIATION

SIGNED BY \_\_\_\_\_

FILLMORE-POST OFFICE

Bank of America

NATIONAL TRUST ASSOCIATION  
SAN FRANCISCO, CALIFORNIA

INTERNAL REVENUE SERVICE

Bank of America

177 Dols 58 cts

10 05

CASHIER'S CHECK

Nadine Hogan

998 11210 0094 0271 85100

No. 0271 41998

Date February 1, 1978

11-94  
1210

\$177.58

DOLLAR

BB-31-6-204



STATE OF CALIFORNIA  
 FRANCHISE TAX BOARD  
 SACRAMENTO CA 95857



# NOTICE OF BALANCE DUE

Date: 09/09/77

Income Year Ended: 06/30/76

APOSTOLIC CORPORATION

Corporate No.: 7640140 AC5\*\*

P O BX 15156  
 SN FRANCISCO CA 94115

Balance Due: \$223.52

YOU HAVE AN UNPAID LIABILITY FOR THE INCOME YEAR ENDED 06/30/76. YOU SHOULD RESOLVE THIS MATTER NOW BY PROMPT PAYMENT. PLEASE CONTACT US IF YOU HAVE ANY QUESTIONS. THE BALANCE DUE IS AS FOLLOWS.

### SUMMARY OF BALANCE DUE

TRANSACTION DESCRIPTION	TRANS. DATE	CHARGES	CREDITS	BALANCE
JUPLMNT TAX	08/18/77	\$200.00		\$200.00
			INTEREST TO DATE	\$23.52
			PAY THIS AMOUNT	\$223.52

ADDITIONAL INTEREST ACCRUES AT \$.0657 A DAY FROM THE DATE OF THIS NOTICE

VERIFICATION STUB

No. 0271 41523

DATE 09/09/77

AMOUNT \$ \*\*223.52\*\*

CASHER'S CHECK

DRAWN ON  
 Fillmore-Post Office

Bank of America  
 NATIONAL TAX ASSOCIATION

FRANCHISE TAX BOARD  
 Corp#7640140 AC5

ISSUED BY  
 1-67 (REV.)

to be made payable to the Franchise Tax Board. Please return one copy of this notice with your check. The annual interest rate is 12%.

REVERSE SIDE FOR EXPLANATION OF TRANSACTION DESCRIPTION

BB-31-b-205

STATE OF CALIFORNIA  
 FRANCHISE TAX BOARD  
 SACRAMENTO CA 95857



# NOTICE OF BALANCE DUE

Date: 10/21/77

Income Year Ended: 06/30/76

APOSTOLIC CORPORATION

Corporate No.: 7640140 AC5\*\*

P O BX 15156  
 SN FRANCISCO CA 94115

Balance Due: \$226.28

OUR PREVIOUS NOTICE REQUESTED PAYMENT OF THE LIABILITY FOR THE INCOME YEAR ENDED 06/30/76. FULL PAYMENT HAS NOT BEEN RECEIVED. WE URGE YOU TO PAY THE FOLLOWING BALANCE DUE PROMPTLY TO AVOID FURTHER ACTION.

## SUMMARY OF BALANCE DUE

TRANSACTION DESCRIPTION	TRANS. DATE	CHARGES	CREDITS	BALANCE
SUPPLMT TAX	08/18/77	\$200.00		\$200.00
			INTEREST TO DATE	\$26.28
			PAY THIS AMOUNT	\$226.28

ADDITIONAL INTEREST ACCRUES AT \$0.0657 A DAY FROM THE DATE OF THIS NOTICE

TAXPAYER SERVICE  
 TELEPHONE (800) 852-7050

Checks and money orders should be made payable to the Franchise Tax Board. Please return one copy of this notice with your payment in the enclosed envelope. The annual interest rate is 12%.

SEE REVERSE SIDE FOR EXPLANATION OF TRANSACTION DESCRIPTION

FTB 524744 (5-77)

BB-31-b-206



STATE OF CALIFORNIA  
FRANCHISE TAX BOARD  
SACRAMENTO, CALIFORNIA 95867

October 13, 1977

In reply refer to  
342:RTF;JJ:wh

Apostolic Corporation  
P. O. Box 15156  
San Francisco, CA 94115

Corporate Number 7640140

Enclosed is a tax clearance certificate valid to December 15, 1977. A copy has been forwarded to the Office of the Secretary of State today.

An inquiry should be directed to the Office of the Secretary of State, Sacramento, CA 95814, as to the necessary action to be taken to dissolve. Such proceedings are a function of that office.

*J. J.*

Tax Auditor  
Tax Clearance Unit  
Telephone (916) 355-0895  
P. O. Box 1468  
Sacramento, CA 95807

Enc.

BB-31-6-207

**STARK, STEWART, SIMON & SPARROWE**

ATTORNEYS AT LAW  
FINANCIAL CENTER BUILDING  
405 FOURTEENTH STREET  
FRANKLIN AT FOURTEENTH  
OAKLAND, CALIFORNIA 94612  
TELEPHONE (415) 834-2200

HERBERT L. BREED (1878-1967)  
BESTOR ROBINSON (RETIRED)  
STANLEY E. SPARROWE (RETIRED)  
NATHAN G. GRAY  
OF COUNSEL

EDGAR B. STEWART  
FRANKLIN C. STARK  
CARL E. SIMON, JR.  
JOHN F. WELLS  
NED ROBINSON  
D. DOUGLAS DAVIES  
DONALD L. EDGAR  
RICHARD H. RAHL  
ROBERT C. FIELD  
GEORGE F. DUNKER, JR.  
ALFRED N. GERTMENIAN  
MERRILL J. SCHWARTZ  
WM. BARRY SALAMUTH  
RICHARD S. BEAUCHEBNE  
THOMAS R. DUFFY  
JANET L. EVANS  
D. BARRATT IRWIN  
LISE A. PEARLMAN  
BERNARD N. WOLF

August 18, 1977

Apostolic Corporation  
c/o The People's Temple of  
the Disciples of Christ  
P. O. Box 15823  
San Francisco, CA 94115

Attention Eugene Chaikin

Re: Apostolic Corporation Dissolution

Dear Gene:

Enclosed is an Officers' Certificate of Election to Wind Up and Dissolve for the purpose of formalizing the dissolution of Apostolic Corporation.

Please have the Secretary and President of the corporation certify that a majority of the members of the corporation presently entitled to vote has consented to the dissolution.

The decision to dissolve can be made either by a vote of the members or, if it will not be possible to gather the members for such a vote, by written consent to the dissolution.

Please return the executed certificate to this office and indicate whether or not the decision was made by vote or written consent. Please also verify that the corporation no longer has any assets. If any assets remain following payment of existing debts, they will have to be distributed in accordance with the Articles of Incorporation to either a 501(c)(3) or a 501(d) organization.

BB-31-6-208

OFFICERS' CERTIFICATE OF ELECTION TO WIND UP AND DISSOLVE  
BY VOTE OR WRITTEN CONSENT OF MEMBERSHIP OF  
APOSTOLIC CORPORATION

The undersigned certify that:

1. They are the President and the Secretary, respectively, of Apostolic Corporation, a California nonprofit corporation.
2. The corporation has elected to wind up and dissolve.
3. The election was made by vote or written consent of members of the corporation; the total number of members entitled to vote on or consent to that election is \_\_\_\_\_.

\_\_\_\_\_  
President

\_\_\_\_\_  
Secretary

Each of the undersigned declares under penalty of perjury that the matters set forth in the foregoing certificate are true and correct of our own knowledge.

Executed at San Francisco, California, on August \_\_\_\_\_,  
1977.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BB-31-6-209

LAW OFFICES OF  
MARSHALL R. BENTZMAN  
1256 MARKET STREET  
SAN FRANCISCO, CA 94102  
  
(415) 864-3131

October 16, 1978

Franchise Tax Board  
345 Larkin Street  
San Francisco, California 94102

Re: Notice to Appear - Personal Income Tax Due  
LE S TEMPLE  
1859 Geary, San Francisco 94115  
350-86-8116  
1976 76025114932

Dear Sirs:

This is to confirm a telephone conversation a representative of my client, Peoples Temple of the Disciples of Christ, had with your office Friday, October 13, 1978.

My client received the attached Notice to Appear and previous Demands for Payment of personal income tax for the tax year 1976 in the amount of \$4,341.97. Please note that the demands and notices received were addressed to LE and finally to LE S TEMPLE, with what appeared to be a social security number, leading to confusion on my client's part in identifying to whom the notices were directed. It was finally discovered that the social security number was actually my client's EIN number. Peoples Temple is a California nonprofit Corporation, and its 1976 Exempt Organization Annual Information Statement was filed with your office early this year. A copy is attached for your reference.

I hereby request an explanation in writing and would appreciate your correcting what appears to be a computer error in that Peoples Temple is exempt from such personal income tax. If you have any questions, please feel free to call me.

Sincerely,

MARSHALL R. BENTZMAN

jc  
Enc.

BB-31-b-210



CALIFORNIA



EXEMPT ORGANIZATION ANNUAL INFORMATION STATEMENT

For calendar year 1976 or fiscal year begun \_\_\_\_\_, 1976, and ended \_\_\_\_\_, 1977

Peoples Temple of the Disciples of Christ
P.O. Box 15023
San Francisco CA 94115

DO NOT USE THESE SPACES
SERIAL NO.
CORPORATE OR ORGANIZATION NO. 5005440
FEDERAL EMPLOYER IDENTIFICATION NO.
ETN 35-0868116

COMPLETE ONLY ONE OF THE FOLLOWING APPLICABLE PARTS (SEE INSTRUCTIONS ON REVERSE)

PART I. All churches, apostolic organizations and religious orders with exclusively religious activities complete this part. (See Instruction A.)

- 1. Indicate the various sources of this organization's receipts by approximate percentage of each item.
a. Contributions, gifts, or grants 94%
b. Income from debt-financed property (rental, lease, dividends, interest, etc.) 4%
c. Other income (describe) 2%

RECEIVED
APR - 7 1978
FRANCHISE TAX BOARD
SAN FRANCISCO, CALIF.
(See Instruction A (5))

PART II. Organizations controlled by State or Public Body, check box [ ]

PART III. Other exempt organizations with gross receipts normally \$5,000 or less (if average gross receipts exceed \$5,000, Form 199 must be filed) complete the following: (See Instruction A (3) and F.)

- a. Gross receipts from dues, fees and assessment of members \$
b. Total gross receipts \$
c. If gross receipts for this year are over \$5,000 but the average for the last three years (including the current year) is not over \$5,000, complete the following:
GROSS RECEIPTS FOR: 1974 \_\_\_\_\_ 1975 \_\_\_\_\_ 1976 \_\_\_\_\_
Average gross receipts for reporting \$

TO BE COMPLETED BY ALL ORGANIZATIONS

- a. Describe primary and secondary activities (attach separate sheet if needed).
1. Principal: Religious worship and human service.
2. Secondary: Christian Sunday School, care for the aged & retarded children
b. If exempt under Section 23701d, have you during the year (1) attempted to influence any national, state, or local legislation, or (2) participated or intervened in any political campaign? (See Instruction F for definitions).
[ ] Yes [X] No If "Yes," attach a detailed description of such activities and copies of any materials published in connection with such activities.
c. Check form(s) filed for current year: Federal [ ] 990 [ ] 990T [ ] 1120; State [ ] 109
d. The books are in care of Laetitia Leroy Telephone Number 922 6418
located at San Francisco CA

Under penalties of perjury, I declare that I have examined this statement, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct and complete. If prepared by a person other than taxpayer, his declaration is based on all information of which he has any knowledge

3/31/78 Date Signature of officer Assistant Secretary California State in which signed

Signature of individual or firm preparing this statement Address

MAIL STATEMENT TO FRANCHISE TAX BOARD, SACRAMENTO, CALIFORNIA 95857 31-6-211







STATE OF CALIFORNIA  
FRANCHISE TAX BOARD  
SACRAMENTO

18001852-7050

DEMAND FOR PAYMENT OF PERSONAL INCOME TAX  
FAILURE TO PAY PROMPTLY MAY RESULT IN LEVY  
ON YOUR WAGES, OTHER INCOME, OR PROPERTY.

THE ASSESSMENTS SHOWN BELOW ARE UNPAID

BILLING DATE  
08 11 78

PAY THIS AMOUNT  $\rightarrow$

BALANCE DUE  
4,265.40

IF YOU HAVE PAID THIS AMOUNT, COMPLETE THE INFORMATION ON REVERSE SIDE

CURRENT ASSESSMENT	TAX YEARS	TAX	PENALTY	INTEREST	ADJUSTMENTS	PRIDE PAYMENTS
PREVIOUS ASSESSMENTS	1976	26200	133100	27240		

LE

1859 GEARY

SAN FRANCISCO CA

94115

ACCOUNT NUMBER  
350 86 8116

ADDITIONAL INTEREST

1.094

AND ACCRUE DAILY  
ON THE ABOVE AMOUNT

THIS IS THE  
NOTICE AND DEMAND  
REQUIRED BY LAW

PLEASE RETURN ORIGINAL WITH PAYMENT PAYABLE TO FRANCHISE TAX BOARD. ENTER YOUR SOC. SEC. NO. ON YOUR CHECK OR MONEY ORDER.  
FTB 5990-M (3-74)

DETACH HERE

BB-31-6-213

STATE OF CALIFORNIA  
FRANCHISE TAX BOARD  
SACRAMENTO, CALIFORNIA 95867



In reply refer to

3508681164

599-0-S-034  
350-86-8116  
12/02/77

350868116  
LE

350-86-8116

1859 GEARY  
SAN FRANCISCO CA 94115

We cannot find a 1976 California personal income tax return in our files under your name, address, and social security number although information given us indicates you may be required to file. **TO HELP US CLEAR OUR RECORDS, FOLLOW THE INSTRUCTIONS UNDER A, B, OR C BELOW.** If you do not answer, we are authorized to assess tax on the basis of available information.

**A.—IF YOU HAVE FILED:**

Please complete Section A on the reverse side of this letter and return it to us.

**B.—IF YOU ARE NOT REQUIRED TO FILE:**

Please complete Section B on the reverse side of this letter and return it to us. See enclosed "Income Tax Instructions" which show filing requirements.

**C.—IF YOU ARE REQUIRED TO FILE BUT HAVE NOT FILED:**

The Personal Income Tax Law requires that every individual who has a filing requirement shall file a tax return each year. Failure to file a return may result in a 25% penalty for failure to file when due and an additional 25% penalty for failure to file after this notification. Computation of this additional penalty does not allow credit for amounts withheld or other prepayments and can be avoided by completing and returning the enclosed Form 540 for 1976 within 10 days from the date of this notice.

If California State income tax was withheld from your wages, a copy of your W-2 must be attached to your delinquent return to support any amount claimed for California State income tax withheld.

If you were not a resident for the entire year of 1976, complete the schedule on page 10 of the enclosed instructions and complete in detail the nonresident portion of Section B on the back of this form. Attach both to your Form 540.

Your payment should include:

**INTEREST** at 6% from the due date of the return (April 15, 1977) for the first year of delinquency. Interest at 12% a year for the second and subsequent delinquent years to the date of payment (second delinquent year begins April 15, 1978).

**PENALTY** for delinquent filing at 25% of the balance of tax due after deducting any credits or California State income tax withheld from your wages.

**A REPLY IS REQUESTED WITHIN 10 DAYS.**

FILING ENFORCEMENT  
Telephone (916) 355-0370  
Enc.

FTB 4600-M(6-77)

RETURN THIS COPY WITH  
YOUR RETURN OR REPLY

BB-31-6-214

3. The tax package on Truth Enterprises was sent over this week with Georgia; I understand tonight that the brief case is found and as this envelope should be in it; Betty prepared it with blank tax forms and xeroxes of receipt sheets of expenditures and income, etc. If anything further is needed let me know.
4. Franchise Tax Board Notice of Revocation and Forfeiture of Privileges sent to P.T. last week: Martha has probably also already written this one up, so this may be redundant. The Notice was sent supposedly because we had never filed the Forms 99B for the years 1974, 1975 and 1976, information returns. Ed left instructions that these were to be done when he went overseas, but no one here knew how to do it because we didn't know what percentages to put in regarding donations, properties, etc. We had taken the forms to Buddy, and he was going to file them, and he was aware of the deadline. But he didn't mention them again, and we failed to pick up on them also, and so the time passed and he did not file them. When we took the Revocation and Forfeiture notice into him, he fell back on the excuse that we had never given him figures to fill in the forms. Well, he should have had it calendared, but of course that does not excuse us from the responsibility of reminding him and being on top of the situation enough to fill out the forms before the deadline. The night we took the Notice in, we filled out the information returns in his office, comparing the previous years before 1974 to arrive at some percentages. Attached are copies of the informational returns. Buddy mailed them in with the attached letter, assuming all would work out. But we wanted to be sure and had Tom Adams take the forms personally to Sacramento, including a letter reserving the corporate name of Peoples Temple (which Dr. South had recommended was absolutely necessary, whereas Buddy had not even mentioned it). Sacramento would not accept the reserve letter, and didn't give Tom any kind of receipt other than a stamp on the forms 99B. Later we had him take in duplicates to the San Francisco office of the Franchise Tax Board, and after several days of checking with them, during which time the Sacramento office informed us that we had submitted the forms after the regular computer time so that we would not be registered in the records as being back in action til next month. We finally hassled this one out with the SF office, who called the Sacto office and after much checking back and forth, we got a letter officially lifting the forfeiture and revocation of privileges, and a certification from the Secretary of State reinstating our name. My impression from all of this is that Buddy is lackadaisical, and talks big but doesn't produce.

BB-31-b-215

STATE OF CALIFORNIA



**FRANCHISE TAX BOARD**  
SACRAMENTO, CALIFORNIA 95857

April 27, 1978

In reply refer to  
340:102:bg:vmb

PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST  
P. O. Box 15023  
San Francisco, CA 94115

Subject : CERTIFICATE OF RELIEF FROM SUSPENSION OR FORFEITURE

Corporate Name : PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST  
Corporate Number: 500544  
Effective Date : April 13, 1978

This corporation has been relieved of suspension or forfeiture and is now in good standing with the Franchise Tax Board.

Collection Section  
Telephone (916) 355-0520

FTB 2557 (3-76)

BB-31-6-216



STATE OF CALIFORNIA

FRANCHISE TAX BOARD

SACRAMENTO, CALIFORNIA 95857

April 13, 1978

Peoples Temple of the Disciples of Christ  
P.O. Box 15384  
San Francisco, CA 94115

Subject : CERTIFICATE OF RELIEF FROM SUSPENSION OR FORFEITURE  
Corporate Name : PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST  
Corporate Number: 5005440 PT20T

This corporation has been relieved of suspension or forfeiture and is now  
in good standing with the Franchise Tax Board.

*Almond*  
Collection Section  
Telephone  
(415) 557-0796

FTB 2557 (3-76)

BB-31-6-217

RECEIPT

Issuing Certificate of Reservation  
For Corporate Name ..... \$4.00

Special Handling:

Jean F. Brown  
P.O. Box 15023  
San Francisco, California 94115

No. 77704

State of California No. 77704  
  
Office of the  
Secretary of State

I, MARCH FONG EU, Secretary of State of the State of California, do hereby certify  
that the name:

PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST

is not one which is likely to mislead the public and is not the same as, and does not  
resemble, so closely as to tend to deceive the name of a corporation formed under the  
laws of this State, or the name of a corporation not incorporated under the laws of this  
State which is authorized to transact intrastate business in this State, or a name which is  
under reservation, as provided in Section 201 of the Corporations Code of this State, and  
that this name is hereby reserved for a period of sixty days commencing on the date hereof  
for the use of the applicant for this certificate.



Issued April 10, 1978 rb

*March Fong Eu*  
Secretary of State

BB-31-6-218

RECEIVED  
 APR 7 1978  
 FRANCHISE TAX BOARD  
 SAN FRANCISCO, CALIF.

PEOPLES TEMPLE  
 OF THE DISCIPLES OF CHRIST  
 P.O. BOX 15384  
 SAN FRANCISCO, CALIF. 94115

Bank of Montreal  
 (California)  
 335 CALIFORNIA STREET  
 SAN FRANCISCO, CALIF. 94104

98

4/5 1978

11  
121

PAY No More than ten and 00/100 Normalized DOLLARS \$ 10.00

TO THE ORDER OF

Franchise Tax Board  
 345 Larkin  
 San Francisco CA

Carol A. Staki  
Jan F. Brewer

⑈000989⑈ ⑆⑆⑆210⑈0003⑆ 00 10330 ⑆⑈

PEOPLES TEMPLE  
 OF THE DISCIPLES OF CHRIST

DETACH AND RETAIN THIS STATEMENT  
 THE ATTACHED CHECK IS IN PAYMENT OF ITEM DESCRIBED BELOW  
 IF NOT CORRECT PLEASE NOTIFY US IMMEDIATELY NO RECEIPT REQUIRED

DELUXE - FORM WVC-3 V-2

DATE	DESCRIPTION	AMOUNT
4/7/78	Franchise Tax Board Revised Fee	\$10.00

BB-31-6-219

LAW OFFICES OF  
MARSHALL R. BENTZMAN  
1256 MARKET STREET  
SAN FRANCISCO, CA 94102  
(415) 864-3131

HAND DELIVERED

April 7, 1978

State of California  
Franchise Tax Board  
Sacramento, California 95857

Attention: Ms. Jackie Nance, Office Supervisor  
Exempt Unit

Re: Peoples Temple of the Disciples of Christ (PT)  
Corporate Number : 5005440  
Parent Number : 0256780

Dear Ms. Nance:

Enclosed for your records and pursuant to our telephone conversation today are:

- 1). Application for Relief From Suspension.
- 2). PT check number 989, dated April 5, 1978, in the amount of \$10.00 as payment of revivor fee..
- 3). Forms 199B for calendar year 1974, 1975, and 1976..

As you know, the Forms 199B for 1974, 1975, and 1976 were filed on March 31, 1978, but had not been cleared by your computer records.

This letter also confirms our discussion of a January 23, 1978 letter from your office (symbols -- 344;GR/RPT: me) which relieved Peoples Temple of filing this Form 199B for calendar years after 1976. Therefore, no Form 199B must be filed for 1977 and thereafter due to our being included in our/organization's filing of their group returns. parent

Thank you for your cooperation in this matter.

Yours truly,

*Marshall R. Bentzman*  
Marshall R. Bentzman

enclosures  
cc: Peoples Temple

MRB/jfb

BB-31-6-220

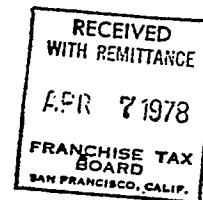


STATE OF CALIFORNIA  
FRANCHISE TAX BOARD  
SACRAMENTO CA 95857



# NOTICE OF SUSPENSION OR FORFEITURE

Date: 04/03/78



PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST, Corporate No.: 5005440 PT20T  
IST,

PO BOX 214  
REDWOOD VLY CA 95470

THE RIGHTS, POWERS, AND PRIVILEGES OF THIS CORPORATION HAVE BEEN SUSPENDED BECAUSE YOU HAVE NOT PAID THE AMOUNT DUE OR FILED THE REQUIRED RETURN.

YOUR RIGHT TO THE CORPORATE NAME HAS BEEN FORFEITED AND IT MAY BE NECESSARY TO SELECT A NEW CORPORATE NAME BEFORE THE CORPORATION CAN BE REVIVED TO GOOD STANDING.

IF THE CORPORATION INTENDS TO TRANSACT BUSINESS OR PROTECT THE CORPORATE NAME, IT MUST REVIVE TO GOOD STANDING IMMEDIATELY.

EXEMPT SECTION  
TELEPHONE (916) 355-0392

BB-31-6-221

( STATUS QUESTIONNAIRE  
and  
APPLICATION FOR RELIEF FROM SUSPENSION OR FORFEITURE

Complete the following and return to the Franchise Tax Board, P.O.  
Box 1468, Sacramento, California 95807

1 Describe status of activity; check appropriate block.

Never active

Was active but ceased activity \_\_\_\_\_

Still active, began activity Nov. 26, 1965  
(DATE) (DATE)

2. If the corporation is to be relieved from suspension or forfeiture, check box and complete the following:

I hereby make application to have the corporation relieved from suspension or forfeiture.

The corporation's annual accounting period ends Dec - 31, 1977.  
Accounting period must end on the last day of a month.

3. If the corporation is to remain suspended or forfeited, complete the following:

A. List all real and/or personal property in which the corporation has an interest, equity or ownership.

\_\_\_\_\_  
\_\_\_\_\_

B. If assets have been distributed, when and to whom were distributions made?

\_\_\_\_\_  
\_\_\_\_\_

C. Names and addresses of principal officers.

\_\_\_\_\_  
\_\_\_\_\_

I certify and declare under penalties of perjury that the foregoing statements are true and complete to the best of my knowledge and belief.

Carol A. Stahl President 4/7/78  
(SIGNED) (TITLE) (DATE)

Any stockholder or creditor or a majority of the surviving trustees or directors may sign on behalf of a California bank or corporation.

Any officer, stockholder or creditor may sign on behalf of a foreign bank or corporation.

BB-31-b-222



CALIFORNIA



EXEMPT ORGANIZATION ANNUAL INFORMATION STATEMENT

For calendar year 1976 or fiscal year begun....., 1976, and ended....., 1977

Peoples Temple of the Disciples of Christ
P.O. Box 15023
San Francisco CA 94115

DO NOT USE THESE SPACES
SERIAL NO.
CY CA A CC
CORPORATE OR ORGANIZATION NO. 5005440
FEDERAL EMPLOYER IDENTIFICATION NO.
EIN 35-0868116

PLEASE AFFIX PREADDRESSED LABEL, PRINT OR TYPE

COMPLETE ONLY ONE OF THE FOLLOWING APPLICABLE PARTS (SEE INSTRUCTIONS, ON REVERSE)

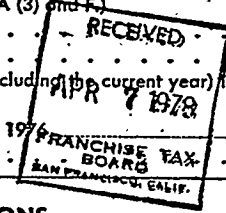
PART I. All churches, apostolic organizations and religious orders with exclusively religious activities complete this part. (See Instruction A.)

- 1. Indicate the various sources of this organization's receipts by approximate percentage of each item.
a. Contributions, gifts, or grants 94 %
b. Income from debt-financed property (rental, lease, dividends, interest, etc.) 4 %
c. Other income (describe) 2 %

PART II. Organizations controlled by State or Public Body, check box [ ] (See Instruction A (5)).

PART III. Other exempt organizations with gross receipts normally \$5,000 or less (if average gross receipts exceed \$5,000, Form 199 must be filed) complete the following: (See Instruction A (3) and F.)

- a. Gross receipts from dues, fees and assessment of members \$
b. Total gross receipts \$
c. If gross receipts for this year are over \$5,000 but the average for the last three years (including the current year) is not over \$5,000, complete the following:
GROSS RECEIPTS FOR: 1974..... 1975.....
Average gross receipts for reporting .....



TO BE COMPLETED BY ALL ORGANIZATIONS

- a. Describe primary and secondary activities (attach separate sheet if needed).
1. Principal: Religious worship and human service.
2. Secondary: Christian Sunday School, care for the aged & retarded children.
b. If exempt under Section 23701d, have you during the year (1) attempted to influence any national, state, or local legislation, or (2) participated or intervened in any political campaign? (See Instruction F for definitions).
[ ] Yes [X] No If "Yes," attach a detailed description of such activities and copies of any materials published in connection with such activities.
c. Check form(s) filed for current year: Federal [ ] 990 [ ] 990T [ ] 1120; State [ ] 109
d. The books are in care of ▶ Laetitia Leroy Telephone Number: 922 6418
Located at ▶ San Francisco CA

Under penalties of perjury, I declare that I have examined this statement, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct and complete. If prepared by a person other than taxpayer, his declaration is based on all information of which he has any knowledge.

3/31/78 Date Signature of officer: [Signature] Assistant Secretary, California Title State in which signed

Signature of individual or firm preparing this statement Address

MAIL STATEMENT TO FRANCHISE TAX BOARD, SACRAMENTO, CALIFORNIA 95857 88-31-6-223



CALIFORNIA



EXEMPT ORGANIZATION ANNUAL INFORMATION STATEMENT

For calendar year 1975 or fiscal year begun \_\_\_\_\_, 1975, and ended \_\_\_\_\_, 1976

Peoples Temple of the Disciples of Christ
P.O. Box 15023
San Francisco CA 94115

DO NOT USE THESE SPACES
SERIAL NO.
CORPORATE OR ORGANIZATION NO. 5005440
FEDERAL EMPLOYER IDENTIFICATION NO. EIN 35-0868116

PLEASE AFFIX PREADDRESSED LABEL, PRINT OR TYPE

COMPLETE ONLY ONE OF THE FOLLOWING APPLICABLE PARTS (SEE INSTRUCTIONS ON REVERSE)

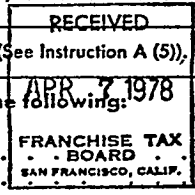
PART I. All churches, apostolic organizations and religious orders with exclusively religious activities complete this part. (See Instruction A.)

- 1. Indicate the various sources of this organization's receipts by approximate percentage of each item.
a. Contributions, gifts, or grants 94%
b. Income from debt-financed property (rental, lease, dividends, interest, etc.) 4%
c. Other rental or lease income %
d. Other income (describe) 2%
2. Is this a group report filed on behalf of affiliated churches? [ ] Yes [X] No

PART II. Organizations controlled by State or Public Body, check box [ ] (See Instruction A (5)).

PART III. Other exempt organizations with gross receipts \$5,000 or less complete the following: (See Instruction A (3) and F.)

- a. Total gross receipts \$
b. Total assets. (Fair Market Value) at end of year \$



TO BE COMPLETED BY ALL ORGANIZATIONS

- a. Describe primary and secondary activities (attach separate sheet if needed).
1. Principal: Religious worship and human service.
2. Secondary: Christian Sunday School, care for the aged & retarded child
b. If exempt under Section 23701d, have you during the year (1) attempted to influence any national, state, or local legislation, or (2) participated or intervened in any political campaign?
c. Check form(s) filed for current year: Federal [ ] 990 [ ] 990T [ ] 1120; State [ ] 109

Under penalties of perjury, I declare that I have examined this statement, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct and complete. If prepared by a person other than taxpayer, his declaration is based on all information of which he has any knowledge.

3/31/78 Date Signature of officer: Jim F. Brown Assistant Secretary California State in which signed

Date Signature of individual or firm preparing this statement Address

MAIL STATEMENT TO FRANCHISE TAX BOARD, SACRAMENTO, CALIFORNIA 95837 31-6-224



CALIFORNIA



EXEMPT ORGANIZATION ANNUAL INFORMATION STATEMENT

For calendar year 1974 or fiscal year begun \_\_\_\_\_, 1974, and ended \_\_\_\_\_, 1975

Name of organization: Peoples Temple of the Disciples of Christ
Address (number and street): P.O. Box 15023
City or town, State and ZIP code: San Francisco CA 94115

DO NOT USE THESE SPACES
SERIAL NO.
CY CA A CC
CORPORATE OR ORGANIZATION NO. 5005440
FEDERAL EMPLOYER IDENTIFICATION NO. EIN-35-0868116

COMPLETE ONLY ONE OF THE FOLLOWING APPLICABLE PARTS (SEE INSTRUCTIONS ON REVERSE)

PART I. All churches, apostolic organizations and religious orders with exclusively religious activities complete this part. (See Instruction A.)

- 1. Indicate the various sources of this organization's receipts by approximate percentage of each item.
a. Contributions, gifts, or grants 92%
b. Income from debt-financed property (rental, lease, dividends, interest, etc.) 5%
c. Other rental or lease income
d. Other income (describe) 3%
2. Is this a group report filed on behalf of affiliated churches? [ ] Yes [X] No

PART II. Organizations controlled by State or Public Body, check box [ ] (See Instruction A (5)).

PART III. Other exempt organizations with gross receipts \$5,000 or less complete the following: (See Instruction A (3) and F.)

- a. Total gross receipts
b. Total assets. (Fair Market Value) at end of year

RECEIVED
APR 7 1978
FRANCHISE TAX BOARD
SAN FRANCISCO, CALIF. \$

TO BE COMPLETED BY ALL ORGANIZATIONS

- a. Describe primary and secondary activities (attach separate sheet if needed).
1. Principal: Religious worship and human service
2. Secondary: Christian Sunday School, care for the aged, & retarded child
b. If exempt under Section 23701d, have you during the year (1) attempted to influence any national, state, or local legislation, or (2) participated or intervened in any political campaign? (See Instruction F for definitions).
[ ] Yes [X] No If "Yes," attach a detailed description of such activities and copies of any materials published in connection with such activities.
c. Check form(s) filed for current year: Federal [ ] 990 [ ] 990T [ ] 1120
State [ ] 109

Under penalties of perjury, I declare that I have examined this statement, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct and complete. If prepared by a person other than taxpayer, his declaration is based on all information of which he has any knowledge.

3/31/78 Date Signature of officer: Jan F. Brown Assistant Secretary California State in which signed

Date Signature of individual or firm preparing this statement Address

MAIL STATEMENT TO FRANCHISE TAX BOARD, SACRAMENTO, CALIFORNIA 95857

BB-31-6-225

File Copy

File: (PT) Calif Franchise Tax Board



CALIFORNIA



EXEMPT ORGANIZATION ANNUAL INFORMATION STATEMENT

calendar year 1 or fiscal year began	PEOPLES TEMPLE OF THE DISCIPLE S OF CHRIST, PO BOX 714 REDWOOD VLY CA 95470		DO NOT USE THESE SPACES					
	Please use label attached or type or print. Indicate address change on label. See Instruction H	Name of organization	Address	SERIAL NO.	CY	CA	FA	A
	City or town		CLASSIFICATION CODE					

Corporate or Organization Number: State franchise No: D-500547 Federal Employer Identification Number: VT 94-214 7086  
 Corp No: 25678 / Federal: EIN 35-0568116

Organizations with gross receipts and assets of less than \$2,000, check box  (see Specific Instruction 1 for Form 199B).  
 Organizations controlled by state or public body, check box  (see Specific Instruction 2 for Form 199B).

**PART I. All churches, apostolic organizations and religious orders with exclusively religious activities complete this part.** (See Specific Instruction 3 for Form 199B.) Other religious organizations file Form 199.

1. Indicate the various sources of this organization's receipts by the approximate percentage of each item. (If you consider that any item duplicates in whole or in part another item of income, so indicate.)

	APPROXIMATE %
a - Contributions, gifts or grants	91
b - Advertising income	4
c - Dividends - Interest	
d - Royalties	3
e - Rental or lease income from Debt Financed Property	
f - Other rental or lease income	
g - Publishing - Sale of publications	
h - Fund raising (describe) <u>Concession Stands, Bake Sales, Community Dinners</u>	2
i - Income from services (describe)	
from business activities (describe)	

*Please Note -*  
*This is form 199B, for 1975 -*  
*which we used for reference in*  
*doing 1979-75-76 ones -*  
*Also NOTE - handwriting is T.O.S...*

Instructions for filing Forms 199 and  
 al Instruction F, Group Returns  
 ts normally \$5,000 or less (with  
 Specific Instruction 4 for Form 199B.)  
 \$ \_\_\_\_\_  
 \$ \_\_\_\_\_  
 \$ \_\_\_\_\_  
 rs (including  
 \$ \_\_\_\_\_  
 2,000 must complete Part III on page 2

ements, and to the best of my knowledge and  
 information of which he has any knowledge.  
 tary California  
 State in which signed  
 Address \_\_\_\_\_

MAIL STATEMENT TO FRANCHISE TAX BOARD, SACRAMENTO, CALIFORNIA 95857

BB-31-b-226

**PART III. All organizations required to file this form, except those with gross receipts and assets less than \$2,000, must also complete this part. (See Specific Instruction 5 for Form 199B.)**

a— Describe principal activities:

Religious Worship and Human Service

b— Describe secondary activities:

Christian Sunday School  
Care for the Aged, Retarded Children

c— If exempt under Section 23701d, have you during the year (1) attempted to influence any national, state, or local legislation, or (2) participated or intervened in any political campaign?  Yes  No If "Yes," attach a detailed description of such activities and copies of any materials published in connection with such activities.

d— Are you required to file Form 109 for this year (see Instruction J)?  Yes  No

e— What is the legal form of your organization (corporation, trust, unincorporated association, etc.)? Corporation

f— The books are in care of Eva H. Pugh Telephone No. 485-8613 (707)

Located at School Way, Redwood Valley, California

g— Form number of federal form filed Federal form filed by General Assembly of the Christian Church (Disciples of Christ)

h— For organizations other than churches:

1. Do you receive rental or lease income from property on which money was borrowed to purchase property or to make improvements on it? (It is not necessary that the loan is recorded against the property.)  Yes  No If "Yes," what is the annual rental or lease income? \_\_\_\_\_

2. Social clubs, exempt under Section 23701g, enter the total of all income received from non-members plus all interest, dividend, royalties and rental income \_\_\_\_\_

**LOCATION OF FRANCHISE TAX BOARD OFFICES**

**EXEMPTS—INFORMATION: TELEPHONE (916) 355-0392**

Address	Zip Code	Telephone	Address	Zip Code	Telephone
Bakersfield	1031 17th Street	93301 322-0540	Santa Ana	28 Civic Center Plaza	92701 558-4540
Fresno	2530 Mariposa Street	93721 486-5540	Santa Barbara	411 E. Canon Perdido Street	93101 963-1828
Long Beach	230 East Fourth Street	90802 435-9116	Santa Rosa	447 College Avenue	95403 544-0540
Los Angeles	3325 Wilshire Boulevard	90010 620-5400	Stockton	31 E. Channel Street	95202 948-0540
Oakland	1916 Broadway	94612 464-0540	Van Nuys	8155 Van Nuys Boulevard	91402 786-9540
Sacramento	920 23rd Street	95816 445-9540	<b>OUT-OF-STATE OFFICES</b>		
San Bernardino	303 W. Third Street	92401 383-4201	Chicago, Ill.	150 North Wacker Drive	60606 332-4025
San Diego	1350 Front Street	92101 236-7540	New York, N.Y.	1180 Avenue of the Americas	10036 581-3840
San Francisco	345 Larkin Street	94102 357-0540			
San Jose	555 N. First Street	95112 998-1540			

BB-31-6-227

10-23

TRUTH ENTERPRISES

What are we supposed to do with Truth?! As I understood from many months ago we were going to dissolve it. Someone over there was going to give us instructions on how it was to done. Still no word and now the third quarter taxes are due.

We have not done any business under Truth since the date of the second quarter closing on taxes. However since we have not received any info on how to fill out credit applications under Valley Enterprises (officers etc.) we are ordering paper under our old Truth account but paying bills with Valley checks. Other suppliers are on a cash basis. We need to have accounts with the paper company's in order to assure a supply of paper when we need it. So we are sitting on the fence waiting for instructions.

We need to know:

- a. What to tell the Franchise Tax Board
- b. What to tell the State Board of Equalization
- c. What to we do about officers signing on credit applications for Valley Enterprises, when they are all overseas?

Clay

B.B-31-6-228



**COUNTY OF SAN JOAQUIN**  
**Statement of DELINQUENT TAXES**

PARCEL NO.		STATE PROPERTY		SALE NO.
175-250-35				35726
Year 1972	SOLD FOR \$ 139.84	TAXES, ASSMTS.	129 10	
		6% PENALTY	7 74	
		COSTS	3 00	
Asst. No.		RED PEN 66% ✓	85 20	
Year 1973	SOLD FOR \$ 125.06	TAXES, ASSMTS.	115 16	
		6% PENALTY	6 90	
		COSTS	3 00	
Asst. No.		RED PEN 54% ✓	62 18	
Year 1974	SOLD FOR \$ 5.80	TAXES, ASSMTS.	2 66	
		6% PENALTY	14	
		COSTS	3 00	
Asst. No.		RED PEN 42% ✓	1 11	
Year 1975	SOLD FOR \$ 128.24	TAXES, ASSMTS.	118 16	
		6% PENALTY	7 68	
		COSTS	3 00	
Asst. No.		RED PEN 30% ✓	35 44	
Year 1976	SOLD FOR \$ 121.52	TAXES, ASSMTS.	111 82	
		6% PENALTY	6 70	
		COSTS	3 00	
Asst. No.		RED PEN 18% ✓	20 12	
Year 1977	SOLD FOR \$ 32.20	TAXES, ASSMTS.	27 56	
		6% PENALTY	1 64	
		COSTS	3 00	
Asst. No.		RED PEN 6% ✓	1 65	
		STATE REDEMPTION FEE	\$ 2 00	
		RECORDING FEE	\$ 6 00	
20% _____		PARTIAL CREDIT	\$	
TOTAL AMOUNT TO REDEEM AS OF		SEP 31 1978	766.36	

Remit by PERSONAL OR CASHIER'S CHECK or MONEY ORDER made payable to John A. Prowse, Tax Collector, and forward with this statement to P. O. Box 2169, Room 150, Court House, Stockton, California 95201.

BB-31-b-229

COUNTY OF SAN JOAQUIN  
STATE OF CALIFORNIA  
SECURED TAX STATEMENT

1978 - 1979  
LIEN DATE - 1201 A.M. MARCH 1, 1978

VALUATIONS		PARCEL NUMBER	
L 375	1,500	175-250-35	118-049 35726
FULL VALUE REAL ESTATE		TAX RATE AREA	SALE NO. STATE PROPERTY
FULL VALUE PERSONAL PROP.		IF A SALE NUMBER IS PRINTED ABOVE OR THE WORD "LIEN" IS PRINTED ABOVE - SEE INFORMATION PRINTED ON REVERSE.	
NET TOTAL ASSESSED VALUE		375	

GROSS TAX DUE  
LESS TAX REDUCTION ATTRIBUTABLE TO STATE FINANCED HOMEOWNERS' TAX RELIEF PROGRAM  
HOMEOWNERS' EXEMPTION - X  
NET TOTAL TAX DUE = 21.82

BILL NUMBER 546582  
STATE OF CALIFORNIA  
Peoples temple of Disciples  
\* P O BOX 15156  
SAN FRANCISCO CA 94115

188 CLAYTON AV STOCKTON CA  
DIRECT ASSESSMENT 5.00  
INCLUDED IN TOTAL TAX

SEE REVERSE OF THIS STATEMENT FOR IMPORTANT INFORMATION

RATES AND DISTRIBUTION OF AMOUNTS PER EACH TAXING AGENCY

TAXING AGENCY	BASE	RATE	AMOUNT
PROP. '13 MANDATE	1	4.0000	15.00
STOCKTON UNIF BONDS	1	.3642	1.37
S J DELTA COLLEGE BD	1	.1133	.42
STKN METRO TRANSIT	1	.0120	.05
DIRECT ASSESSMENT			5.00
TOTAL EXTENDED TAX			21.82

DIRECT ASSESSMENTS MAY INCLUDE FEES FOR WATER, SEWER, LIGHTING, ETC

AGENCY NO.

BB-31-6-230

PARCEL NUMBER 175-250-35  
TAX RATE AREA 118-049  
SALE NO. STATE PROPERTY 35726

WRITE PARCEL NO. ON YOUR CHECK  
DETACH AND RETURN THIS PAYMENT STUB WITH YOUR REMITTANCE TO:

JOHN A PROWSE  
P.O. BOX 2189, STOCKTON, CAL. 95201

1<sup>ST</sup> INSTALLMENT  
10.91  
6% PEN.

STATE OF CALIFORNIA  
Peoples Temple of Disciples  
\* P O BOX 15156  
SAN FRANCISCO CA 94115

IF YOU DESIRE A RECEIPT - CHECK THIS BOX IT WILL BE MAILED BACK IN 4 TO 6 WEEKS

PARCEL NUMBER 175-250-35  
TAX RATE AREA 118-049  
SALE NO. STATE PROPERTY 35726

WRITE PARCEL NUMBER ON YOUR CHECK.  
DETACH AND RETURN THIS PAYMENT STUB WITH YOUR REMITTANCE TO:

JOHN A. PROWSE  
P.O. BOX 2189, STOCKTON, CAL. 95201

2<sup>ND</sup> INST. OR TOTAL TAX  
10.91  
6% PEN. COST

NET TOTAL TAX DUE 21.82  
6% PEN. COST

STATE OF CALIFORNIA  
Peoples Temple of Disciples  
\* P O BOX 15156  
SAN FRANCISCO CA 94115

IF YOU DESIRE A RECEIPT - CHECK THIS BOX IT WILL BE MAILED BACK IN 4 TO 6 WEEKS

McFARLAND ENERGY, INC.  
box 3608, santa fe springs  
10425 south painter avenue  
santa fe springs, california 90670  
(213) 944-0181 (213) 685-3126

---

20 October 1978

Peoples Temple of the Disciples of Christ  
Post Office Box 15156  
San Francisco, California 94115

Re: South Stockton Prospect  
San Joaquin County, California  
Proposed Peoples Temple of the Disciples  
in Christ Lease

Gentlemen:

According to the public records of San Joaquin County you own property south of the City of Stockton that we would like to lease for oil and gas exploration purposes. We have leases from adjoining owners, and we hope to have all of the lots in that neighborhood leased soon.

We are enclosing a lease set prepared for your signature. As you will see, the working period of the lease is five years. During that period this lease will be pooled with a group of other leases so that we will have a large enough block of land within which to drill a gas well. The drill-site will be on a larger parcel of land, not on any of the small lots.

The lease sets out a \$5.00 per acre rental for the first year and also for subsequent rentals during the five years. If we find production all of the lessors within the pooled area will share in the 1/6 landowner's royalty set forth in the lease. Single lots receive a flat \$10.00 rental.

We hope that you will decide to accept our offer. To do so, please sign the two bluebacked leases (both the short form and the long form) before a notary public. Please initial Article Nine of the long form lease. Enclosed is a stamped envelope for you to use for returning the leases to us. When they reach us we will mail you a check for \$10.00.

Thank you.

Very truly yours

*Thomas J. McInerney*

Thomas J. McInerney  
Assistant Land Manager

TJM:ct  
encs

S. Stockton #243  
175-25-35

RECORDING REQUESTED BY

WHEN RECORDED MAIL TO

SPACE ABOVE THIS LINE FOR RECORDER'S USE

### OIL, GAS AND MINERAL LEASE (SHORT FORM)

THIS LEASE AND AGREEMENT, made and entered into \_\_\_\_\_, 19...  
by and between PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST, a California corporation,

hereinafter called "Lessor" (whether one or more), and McFarland Energy, Inc.  
a California Corporation hereinafter called "Lessee."

**WITNESSETH:**

Lessor hereby leases to Lessee and Lessee hereby leases from Lessor the land hereinafter described, for the purposes and with the exclusive right of prospecting, exploring, mining, drilling and operating said land for oil, gas, other hydrocarbons, associated substances, sulphur, nitrogen, carbon dioxide, helium and other commercially valuable substances which may be produced through wells on said land, whether or not similar to the above-mentioned substances. The land hereby leased is situated in San Joaquin County, California, and is described as follows:

See EXHIBIT "A" attached hereto and by reference made a part hereof:

This lease is made for the term and upon and subject to each and all the terms, provisions, covenants and conditions set forth in the certain Oil, Gas and Mineral Lease of even date herewith between the parties hereto covering the and hereinabove described, and said Oil, Gas and Mineral Lease is hereby incorporated herein with the same force and effect as though herein set forth at length.

IN WITNESS WHEREOF, said parties have caused this lease to be duly executed as of the date first hereinabove written.  
PEOPLES TEMPLE OF THE DISCIPLES  
OF CHRIST

BY: \_\_\_\_\_  
President  
BY: \_\_\_\_\_  
Secretary

LESSOR

McFarland Energy, Inc.

BY: \_\_\_\_\_  
M. K. Sanford - Contract Agent

LESSEE

BB-31-b-231

STATE OF CALIFORNIA

County of \_\_\_\_\_ } ss.

On \_\_\_\_\_ before me, the undersigned, a Notary Public in and for said County and State, personally appeared \_\_\_\_\_

\_\_\_\_\_ known to me to be the person whose name \_\_\_\_\_ subscribed to the within instrument and acknowledged that \_\_\_\_\_ executed the same.

(SEAL)

NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

\_\_\_\_\_  
Type or Print Name of Notary

STATE OF CALIFORNIA  
COUNTY OF \_\_\_\_\_ } ss

On \_\_\_\_\_ before me, the undersigned, a Notary Public in and for said County and State, personally appeared \_\_\_\_\_, known to me to be the

President, and \_\_\_\_\_, known to me to be the \_\_\_\_\_ Secretary of \_\_\_\_\_

the corporation that executed the within instrument, and known to me to be the persons who executed the within instrument on behalf of the corporation therein named, and acknowledged to me that such corporation executed the same pursuant to its by-laws or a resolution of its board of directors.

(SEAL)

NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

\_\_\_\_\_  
Type or Print Name of Notary

STATE OF CALIFORNIA  
COUNTY OF \_\_\_\_\_ } ss

On \_\_\_\_\_ before me, the undersigned, a Notary Public in and for said County and State, personally appeared \_\_\_\_\_ known to me to be the

President, and \_\_\_\_\_ known to me to be the \_\_\_\_\_ Secretary of \_\_\_\_\_

the corporation that executed the within instrument, and known to me to be the persons who executed the within instrument on behalf of the corporation therein named, and acknowledged to me that such corporation executed the same pursuant to its by-laws or a resolution of its board of directors.

(SEAL)

NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

\_\_\_\_\_  
Type or Print Name of Notary

Vertical text on the left margin, possibly a page number or reference code.

EXHIBIT "A"

THE West 50 feet of the East 150 feet of the North 140 feet of the following described property:

A tract of land situated in the County of San Joaquin, State of California, in Sections 11 and 12 of C. M. Weber Grant, and being a portion of Lots 111 and 112 of MOSSWOOD PARK, as per map filed in Book of Maps, Volume 8 at Page 52, San Joaquin County Records, and more particularly described as follow, to-wit:

BEGINNING at an iron pipe at the intersection of the East line of Odell Avenue shown on said Map of Mosswood Park, with the South line of Clayton Avenue as shown on Map "C" Mosswood Park, filed in Book of Maps, Volume 11, Page 4, San Joaquin County Records; thence along the said South line of Clayton Avenue, North  $71^{\circ} 08'$  East 308.68 feet to an iron pipe; thence along the Southerly extension of the West line of Mary Avenue, South  $17^{\circ} 52'$  East 340.47 feet to an iron pipe; thence South  $26^{\circ} 38'$  West 66.87 feet to an iron pipe at the North west corner of the 25.00 acre tract shown on Map of Survey filed in Book of Surveys, Volume 6, at Page 143, San Joaquin County Records; thence along the Westerly line of said 25.00 acre tract, South  $17^{\circ} 52'$  East 202.65 feet to an iron pipe; thence South  $71^{\circ} 08'$  West 281.60 feet to a point in the East line of Odell Avenue; thence North  $17^{\circ} 52'$  West 590 feet to the point of beginning.

INITIAL

BB-31-6-232

RECORDING REQUESTED BY

S. Stockton #243

175-25-35

WHEN RECORDED MAIL TO

SPACE ABOVE THIS LINE FOR RECORDER'S USE

### OIL, GAS AND MINERAL LEASE

THIS LEASE AND AGREEMENT, made and entered into \_\_\_\_\_ 10 \_\_\_\_\_  
by and between PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST, a California corporation,

hereinafter called "Lessor" (whether one or more), and McFarland Energy, Inc.  
a California Corporation hereinafter called "Lessee,"

WITNESSETH: For and in consideration of a rental paid in advance upon execution hereof, receipt of which is hereby acknowledged, and the covenants and agreements hereinafter contained on the part of Lessee to be kept and performed, Lessor does hereby lease to Lessee the land hereinafter described (herein sometimes called the "leased land") for the purposes and with the exclusive right of prospecting, exploring, mining, drilling and operating the leased land for oil, gas, other hydrocarbons, associated substances, sulphur, nitrogen, carbon dioxide, helium and other commercially valuable substances which may be produced through wells on the leased land, whether or not similar to the above-mentioned substances (hereinafter collectively called "substances") and producing, taking, treating, storing, removing and disposing of such substances from the leased land, together with the right to construct, erect, maintain, operate, use, repair, replace and remove pipelines, telephone, telegraph and power lines, tanks, machinery, appliances, buildings and other structures, useful, necessary or proper for carrying on its operations on the leased land, the right to drill thereon for water and the free use of water so obtained (but not water from Lessor's wells) in operations on the leased land, and rights of way for passage over, upon and across and ingress and egress to and from the leased land for any or all of the above-mentioned purposes. Any pipelines, pole lines or roads so constructed by Lessee may also be used by it in its operations on lands in the vicinity of the leased land. Lessor shall have the right to occupy and use the leased land in any manner and to any extent not inconsistent with Lessee's rights or in interference with Lessee's operations hereunder. The land hereby leased is situated in the County of San Joaquin, State of California, and is described as follows:

See EXHIBIT "A" attached hereto and by reference made a part hereof:

together with such rights as Lessor may have in any roads, streets, alleys, waterways, canals, sloughs, levees, ditches, easements, rights and rights of way upon, within or adjoining the above-described property and containing 0.161 acres, more or less.

TO HAVE AND TO HOLD the same for a term of 20 years from and after the date hereof and so long thereafter as Lessee shall conduct development (including, without limitation, drilling, re-drilling, deepening, repairing and reworking) or producing operations on the leased land without cessation for more than 90 consecutive days, or be excused therefrom as hereinafter provided.

In consideration of the premises, the parties hereby agree as follows:

1. On or before five (5) years after the date hereof (the last day of said period being hereinafter referred to as the "working date"), Lessee shall either commence "drilling operations" on the leased land and thereafter continue its operations with reasonable diligence until oil or gas or another of said substances is found in paying quantities or a depth is reached at which further drilling would in the judgment of Lessee be unprofitable, or quitclaim and surrender this lease as hereinafter provided.

2. Lessee has paid Lessor rental in full hereunder for the first twelve (12) months of the term hereof. If Lessee has not commenced drilling operations on the leased land or terminated this lease within that time, Lessee, commencing with the expiration thereof, shall pay or tender to Lessor annually in advance, as rental, the sum of five dollars (\$5.00) per acre for so much of the above-described land as may then still be held under this lease at the time of payment and shall continue such payments until drilling operations are commenced or this lease terminated.

3. The payments required to be made by Lessee hereunder may be made by its check issued and made payable as hereinafter provided. All persons entitled to participate or share in such payments shall, at the request of Lessee, unite in a written designation of one person, bank or corporation as Lessor's agent to receive such payments, to the end that Lessee shall not be required to make any payment otherwise than by one check, which check shall be payable to but one payee, such payee to assume the burden and responsibility of making a proper distribution without expense to Lessee among the persons entitled thereto. When such designation is made, said payments may be made by mailing such check to the payee at the address designated. Until such designation is made, such checks may be made payable and may be mailed to LESSOR at

A waiver by Lessee of the provisions of this paragraph in the making of any payment or payments shall not be deemed a waiver thereof with respect to subsequent payments. If at any time there be no one person, bank or corporation authorized to receive payments hereunder, the time for making such payments shall be extended until Lessee has been notified of such designation.

4. Any notice to be given by either party to the other hereunder may be delivered in person or by registered or certified mail, postage prepaid, addressed to the party for whom intended as follows: to Lessor at \_\_\_\_\_

to Lessee at 10425 South Painter Avenue, Santa Fe Springs, California 90670  
Either party may from time to time, by written notice to the other, designate a different address which shall be substituted for the one above specified. If any notice from one party to the other is given by registered or certified mail, usual time for transmission of mail shall be computed and at the end of such time service of notice will be considered made.

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5. If oil, gas or another of said substances is not obtained in paying quantities in the first well drilled on the leased land, and shall Lessee, within 6 months after its completion or abandonment, shall commence drilling operations for a second well, and shall prosecute the same with reasonable diligence until oil, gas or another of said substances is found in paying quantities; or until it is drilled to a depth at which further drilling would, in the judgment of Lessee, be unprofitable; and Lessee shall in like manner continue its operations until oil, gas or another of said substances is found in paying quantities or this lease terminated; provided, however, that nothing in this paragraph contained shall require the commencement of drilling operations for the second or any subsequent well (other than an offset well) before said working date. If, however, before said working date, there shall be any period of more than 6 months between the completion or abandonment of any well and the commencement of drilling operations for the next well or the termination of this lease for which rental has not theretofore been paid, Lessee shall pay rental for such period (except for time herein allowed between wells) at the rate hereinabove set forth, in installments, quarterly in advance.

6. The leased land shall be deemed to have been "fully drilled" within the meaning hereof whenever there shall have been drilled thereon a number of wells equal to the number of acres then subject to this lease, divided by 40 for oil, or 640 for gas or gas and condensate, plus one additional well for any remaining major fraction. If oil is found in paying quantities in any well drilled by Lessee on the leased land, Lessee will continue to drill wells for oil with one string of tools, working with reasonable diligence, allowing not more than 6 months between the completion or abandonment of one and the commencement of operations for the next, until the leased land has been fully drilled. Lessee shall be given credit for so much of the time in each such 6 months' drilling interval as is not utilized because of drilling by Lessee sooner than required and such credit may be used to extend subsequent drilling intervals in such manner as Lessee may determine. After the leased land has been fully drilled, Lessee may at any time drill further wells if it shall so elect, but it shall not be required so to do. In the event gas or gas and condensate in paying quantities is discovered in any well drilled by Lessee on the leased land, then, if and so long as oil in paying quantities has not been discovered in any such well, the leased land shall be considered as gas land and not as oil land until at some later date oil in paying quantities is discovered. While the leased land is considered as gas land, drilling for oil shall not be required, except to comply with the provisions of this lease relative to offset wells. Lessee shall, however, drill further wells for gas if there is an available market for gas at the well and if and to the extent that such drilling is requisite for the proper development of said land for gas; but it shall not be required to drill more wells than are necessary to supply such part of the market demand for gas from the field as may fairly and reasonably be apportioned to the leased land and shall not be required to drill more wells after the leased land has been fully drilled.

7. If, before the leased land has been fully drilled, a well producing oil in paying quantities (hereinafter called an "outside well") is drilled upon adjacent land not owned or controlled by Lessor within 330 feet or producing gas in paying quantities within 1320 feet (hereinafter called "offset distance") from a boundary of the leased land, Lessee shall offset such outside well by the commencement of drilling operations at a suitable offset location on the leased land within 6 months after it is ascertained that the production of oil or gas from such outside well is in paying quantities, except that (a) if a well is being drilled on the leased land, said time shall be extended until 6 months after the completion or abandonment of the well so being drilled, or (b) if there already exists or is being drilled on the leased land a well at a suitable offset location, it shall take the place of the required offset well. A suitable offset location within the meaning hereof shall be one which is within the offset distance from the boundary and not more than twice the offset distance from a line drawn from the outside well to the nearest point in said boundary and extended through the leased land. Offset wells shall be counted in determining when the leased land has been fully drilled.

8. Except as herein otherwise provided, Lessee shall drill each well and operate each completed well in accordance with good oil field practice so long as such well shall produce oil or gas in paying quantities but in conformity with any reasonable conservation or curtailment program affecting the drilling of wells or the production of oil or gas or either thereof from said land to which Lessee may voluntarily subscribe or become a party, or with any conservation or curtailment program which may be imposed by law or by any appropriate governmental agency. After the completion of the first oil well, drilling or producing operations hereunder (except of offset wells when wells offset or to be offset are being operated from the leased land is \$1.50 or less per barrel at the well, or when there is no available market for such oil at the well above said price, and in either case for a period of 90 days after the reason for suspension ceases to exist. Gas wells need not be operated when there is no market for gas at the well at a price and under conditions which Lessee believes to be for the best interests of both parties hereto. Lessee shall comply with all state, federal and local laws and with the rules, regulations and orders of any federal, state or other governmental agency having jurisdiction in the premises with respect to the spacing, drilling or producing of wells, or other operations for oil or gas, and if there be any conflict between the same and provisions of this lease, such laws, rules, regulations and orders shall modify or supersede, as the case may be, the relevant provisions of this lease.

9. The term "royalty share" as used herein means one-sixth (1/6).

10. Lessee shall pay Lessor as royalty on oil the value of the royalty share of all oil produced and removed from the leased land, after making the customary adjustments for temperature, water and b.s. at the posted available market price at the well for oil of like gravity and quality on the day the oil is so removed or, at Lessor's option, in lieu of such payment Lessee shall deliver the royalty share of said oil, free of cost, into Lessor's tanks on the leased land or into pipeline thereon designated by Lessor. A change from payment in cash to delivery in kind, or vice versa, may not be made oftener than once in any calendar year and then only on 60 days' prior written notice to Lessee. If royalty on oil is payable in cash, Lessee may deduct therefrom a reasonable charge for dehydration, cleaning and treating such oil and a reasonable charge for transportation to the treating plant. Nothing herein contained shall be construed as obligating Lessee to treat oil. If Lessor shall elect to receive the royalty on oil in kind, it shall be of the same quality as the oil removed from the leased land for Lessee's own account, and if Lessee's own oil shall be treated before such removal, Lessor's oil will be treated therewith before delivery to Lessor, and Lessor, in such event, shall pay a proportionate part of the cost of treatment. No royalty shall be due Lessor for or on account of oil used by Lessee in operations on the leased land or lost through evaporation, leakage, fire or other casualty prior to the removal of the same or prior to delivery to Lessor if royalty shall be delivered in kind.

11. Lessee shall pay Lessor as royalty on natural gas the royalty share of a value which shall be the sum of the following:

a) The net proceeds received by Lessee from the sale of gas produced from wells on the leased land (whether such gas be sold by Lessee in its natural state or as residual dry gas after extracting gasoline and other content therefrom). Gas treated at a gasoline extraction plant not owned or operated by Lessee and for which Lessee receives a royalty from the operator of such plant shall be deemed sold in its natural state for an amount equal to the market value of the royalty received by Lessee. Except as otherwise provided herein, gas used or consumed by Lessee in operations other than under this lease shall be deemed sold for the market value thereof. The value of gas and products extracted therefrom, used or consumed in the operation of a gasoline extraction plant (to the extent that it is so used for processing gas from the leased land), or in operations on the leased land, or in repressuring any oil bearing formation from which a well or wells on the leased land is producing, shall not be included. The cost of processing, treating, compressing, handling and transporting gas in connection with the sale thereof shall be deducted in determining net proceeds of sale.

b) The market value at the extraction plant of all gasoline and other liquid hydrocarbons extracted and saved from natural gas from the leased land as a result of processing such gas at a plant owned or operated by Lessee, less the cost of such processing, which cost for the purposes hereof will be deemed to be sixty percent (60%) of said last-mentioned market value.

c) The market value, at the plant where extracted, of all gasoline and other liquid hydrocarbons received by Lessee as a result of the processing of natural gas from the leased land at a plant not owned or operated by Lessee (if such processing is not on a royalty basis) less the cost to Lessee of such processing.

Nothing herein contained shall obligate Lessee to treat or process natural gas nor shall Lessee be obligated to save, sell or otherwise dispose of natural gas or residual dry gas, as the case may be, unless there is a market therefor at the well or processing plant at a price and under conditions which Lessee believes to be for the best interests of both parties hereto, or to pay royalty on any gas which is neither sold nor used.

12. Lessee shall pay Lessor as royalty the market value on the leased land, in the condition as produced, of the royalty share of any substances covered by this lease, other than oil and gas and the products thereof, which Lessee may elect to produce and save or market or utilize from the leased land.

13. Settlement shall be made by Lessee on or before the last day of each calendar month for all royalties which accrued during the preceding month and Lessee shall furnish Lessor monthly statements showing the computation of royalties. Lessor agrees to examine promptly each and all statements and remittances forwarded by Lessee to it hereunder and promptly advise Lessee of any objection thereto.

14. The rentals and royalties provided for in this lease are based on the whole of the oil and gas rights in the land described above. If Lessor owns less than the whole of the oil and gas rights in said land, the rentals and royalties accruing hereunder shall be proportionately reduced. If any claim is asserted or any action or proceeding instituted by Lessor, or by any third party claiming title to the leased land or any part thereof or any interest therein or in any production therefrom, adverse to Lessor or in hostility to rights claimed in good faith by Lessee under this lease, then during the pendency of such controversy and until 90 days after final determination thereof, Lessee may defer or discontinue all operations on the leased land or, if it operates wells, it may deposit royalties accruing hereunder in respect to the production therefrom in any bank in the State of California to abide the final determination of such controversy.



15. Lessee shall pay all taxes levied upon or assessed against its improvements, fixtures and personal property on the leased land, including Lessee's oil stored thereon. Taxes levied upon or assessed against the minerals and mineral rights subject to this lease (or, if same shall not be separately assessed, such part of the taxes on the leased land as are due to the discovery of oil, gas or any of the above-mentioned other substances on the leased land or lands adjacent thereto) shall be paid as follows: The royalty share thereof by all of the persons entitled to share in the royalty hereunder, according to their several interests in said royalty and the remainder thereof by Lessee. Any severance tax or other tax, assessment, or license now or hereafter levied or imposed, measured by the quantity or value of oil, natural gasoline, gas or said other substances produced from the leased land, or any thereof, shall be borne by the parties in the same ratio as taxes on minerals and mineral rights. Lessee shall not be liable for any special assessment for local improvements or benefits.

16. Lessee, at its own cost and expense, shall pay for all labor performed and materials furnished in the operations of Lessee hereunder and Lessor shall not be chargeable with, or liable for, any part thereof. Lessee shall protect the leased land from liens of every character arising from its operations. Lessor may post and keep posted on the leased land notices to protect the same from liens.

17. Upon written request of Lessor, Lessee shall lay all pipelines which it constructs through cultivated portions of the leased land below plow depth and upon similar request shall fence all sump holes and other excavations to safeguard livestock.

18. If Lessor is the owner of the surface of the leased land, Lessee shall pay the amount of all damages to livestock, crops, fruit or nut trees, timber, fences, ditches, buildings and other improvements caused by Lessee's operations on the leased land, which payments shall be made to Lessor or Lessor's tenant, whichever shall sustain such damage. All disputes as to the amount thereof shall be determined by arbitration. If Lessor is not the owner of such surface, Lessee will hold Lessor harmless from all claims and demands arising out of Lessee's operations hereunder which may be asserted by the owner of the surface or by any tenant of such owner.

19. Lessee shall not drill any well on said leased land within 100 feet of any then existing building thereon without written consent of the owner of such building, nor shall Lessee drill any well upon lands occupied, used or held for railroad purposes.

20. Lessor, at all reasonable times, may inspect the leased land and the work done and in progress thereon, and the production therefrom. Lessor may also examine the books kept by Lessee in relation to the amount and character of the production from the leased land and disposition thereof. Lessee, on written request of Lessor therefor, shall furnish to Lessor copies of logs of all wells drilled by Lessee on the leased land.

21. Lessee shall have the right at any time to remove from the leased land any machinery, rigs, piping, casing and other property and improvements belonging to or furnished by Lessee, including that installed in wells or otherwise annexed to the land; provided that, in the event of termination of this lease in its entirety, such removal shall be completed within 4 months thereafter and, in the event of termination of this lease as to a portion of the leased land, all such property not needed by Lessee for its operations on land retained under the lease shall be removed from the land as to which this lease is terminated within 4 months after such partial termination and the remainder shall be removed within 4 months after the termination of the lease in its entirety. Lessee, after termination of this lease, shall fill all sump holes and other excavations made by it on the leased land and in other respects restore the leased land as nearly to its original condition as is reasonably practical, but Lessee shall not be obliged to restore anything for which it may theretofore have made payment by way of damages.

22. Lessee, at its option, may at any time quitclaim and surrender all of the leased land, in which event this lease shall be at an end and Lessee shall be relieved of all obligations thereunder save and except the obligation to pay rents and royalties theretofore accrued and any obligation hereby imposed for removal of equipment and restoration of the premises. Lessee, at its option, may at any time, or from time to time, quitclaim and surrender any part of the leased land not desired by it, and in such event the amount of any rents, quitclaim and surrender shall be determined by the acreage retained. Land so quitclaimed shall remain subject to the easements and rights of way herein provided for so long as operations are being carried on by Lessee on the retained part of the leased land, and Lessor agrees that there shall not be drilled on the quitclaimed land any oil or gas well which is within 330 feet of any well retained by Lessee or being drilled by it.

23. Lessee may at any time with respect to a designated part or all of the leased land, (a) surrender its right to produce oil, or (b) surrender its right to produce gas. A surrender of the right to produce oil shall include a surrender of the right to produce the gas which will necessarily be produced therewith. A surrender of oil rights in all the leased land will relieve Lessee of further obligation to drill oil wells. A surrender of oil rights in a part only of the leased land will reduce the number of required oil wells to a number determined by the acreage as to which oil rights are retained by Lessee. A surrender of oil rights shall have no effect on obligations to drill for gas and a surrender of gas rights shall have no effect on obligations to drill for oil.

24. Performance of covenants and conditions imposed upon Lessee hereunder shall be excused while, and to the extent that, Lessee is hindered in or prevented from complying therewith, in whole or in part, by war, riots, strikes, lockouts, action of the elements, accidents, inability to obtain materials in the open market or to obtain transportation therefor, laws, rules and regulations of any federal, state, municipal or other governmental agency or any other cause beyond the control of the Lessee, whether similar or dissimilar to those herein specifically enumerated and without regard to whether such cause exists at the date hereof or hereafter arises.

25. a) If Lessee shall fail to pay promptly any installment of royalty or rent, and if such default shall continue for a period of 15 days after written demand therefor, then at the option of Lessor, this lease shall forthwith terminate; provided, however, that if there be a bona fide dispute as to the amount due, and all uncaptured amounts are paid, said 15 day period shall be extended until 5 days after such dispute is settled by final court decree, arbitration or mutual agreement.

b) In case of default by Lessee with respect to any other condition or covenant hereof and continuance of such default for 90 days after written notice from Lessor to Lessee to perform such condition or covenant, then at the option of Lessor this lease shall forthwith cease and terminate except that if any oil well has theretofore been drilled or is then being drilled and Lessee is not in default in connection therewith, this lease shall nevertheless continue in effect as to an area to be selected by Lessee not exceeding 40 acres for each such oil well, and if any gas well has theretofore been drilled or is being drilled and Lessee is not in default in connection therewith, this lease shall remain in effect for the production of gas and for development for gas (but not oil or gas associated with oil) as to an area to be selected by Lessee not exceeding 80 acres for each such gas well. Lessee shall not, however, be deemed to be in default while work is in progress in good faith which when completed will constitute compliance with such condition or covenant. A termination of this lease as to a part only of the leased land or as to a part only of Lessee's rights shall not affect such rights or any easements as may be necessary in Lessee's operations on the part of the leased land as to which no such termination shall have occurred.

26. Should Lessor hereafter acquire any additional right, title or interest in or to the leased land, it shall be subject to the provisions hereof to the same extent as if owned by Lessor at the time hereof. Lessor agrees that if Lessee shall make any payment on account of any tax not required to be paid by it under the conditions hereof or any mortgage or other lien on or against any of the lands subject to this lease, it shall, in addition to the right of subrogation, have the right to reimburse itself out of any royalty or rents accruing hereunder.

27. If this lease shall be assigned as to a particular part or parts of the leased land, such division of the leasehold estate shall constitute and create separate and distinct holdings upon the lease and according to the several portions of the leased land as thus divided, and the holder or owner of each such portion of the leased land shall be required to comply with and perform Lessee's obligations under the lease for, and only to the extent of, his portion of the leased land, provided that nothing herein shall be construed to enlarge or multiply the drilling or rental obligations, and provided further that the commencement of the drilling operations and the prosecution thereof, as provided in paragraphs 1, 5 and 6 hereof, either by the Lessee or any assignee hereunder shall protect the lease as a whole. No change in the ownership of land or minerals covered by this lease, and no assignment or transfer by operation of law or otherwise of rents or royalties shall be binding on Lessee until it has been furnished with satisfactory written evidence thereof.

28. Lessee shall have the right at its option, at any time and from time to time, either before or after the discovery of oil, gas or other substances on the leased land, but prior to the expiration of 20 years from the date of this lease, to combine and pool all or any part of the leased land or interest therein into one or more operating units with any other land or interest therein (whether held by Lessee or others and whether or not the surface of such other land may be used for oil or gas development purposes) lying within the section in which the leased land to be pooled is located or within any section having a common boundary or corner with such section. Each operating unit may be of such size and shape as Lessee may desire, provided that no such unit created for oil development purposes shall exceed 40 acres in area and no such unit created for gas or gas and condensate development purposes shall exceed 660 acres in area. If any of the land to be pooled has not been divided into sections by the United States Government, then Lessee shall project sections thereon, following as nearly as practicable the usual Government system, and such projected sections shall be deemed "sections" for the purpose of this provision. Each operating unit created hereunder shall be created by and shall become effective upon the execution by Lessee of a Declaration of Pooling setting forth the exterior boundaries of the unit so created and describing the lands pooled thereunder. If there are any lands or interests in lands within the exterior boundaries of any operating unit which are not pooled therein, Lessee may, at any time after creation of such unit, add any or all such additional lands or interests to such unit by executing a Supplemental Declaration of Pooling, but no retroactive adjustment of royalties shall be made. Promptly after execution of each Declaration of Pooling and each Supplemental Declaration of Pooling Lessee shall give written notice thereof to Lessor. Any operating unit may include land upon which a well has theretofore been completed or upon which operations for drilling

have theretofore been commenced, and within the meaning of the requirements of this lease any such well or operations, if off the leased land, shall be considered as having been commenced immediately after the effective date of such pooling. Production, drilling or reworking operations anywhere on any operating unit created hereunder shall be treated as production, drilling or reworking operations on the leased land. There shall be allocated to the leased land the proportion of the pooled production from any such operating unit (whether or not such production is from the leased land) that the number of surface acres covered by this lease and included in such unit bears to the total number of surface acres in such unit; royalties shall be paid hereunder only upon that portion of such production so allocated, and as to pooled production from land in such unit such royalties shall be in lieu of any other royalties. If taxes of any kind are levied or assessed which are based upon the quantity of pooled substances underlying or produced from any such operating unit, then the share of such taxes to be borne by Lessor as provided in this lease shall be in proportion to the share of production from such unit allocated to the leased land. Lessee may at any time quitclaim to the persons entitled thereto all or any part of the land in any such operating unit, and no owner of land in such unit not owning any interest in quitclaimed land, except by virtue of such pooling, shall have any interest in such quitclaimed land after the quitclaim is delivered or recorded. Allocation of production as aforesaid from any such operating unit, whether to the leased land or in like manner to other lands therein, shall continue notwithstanding any quitclaim or other termination, either in whole or in part, of this or any other lease covering lands in such unit until such time as the owner of such land shall (or shall give others the right to) drill for or produce any of the pooled substances from any part of such land, whereupon all such lands formerly included in such unit and as to which the lease covering the same shall have been terminated, shall be excluded in determining the production to be allocated to the respective lands in such unit and in prorating taxes; and in the event of the failure of Lessor's or any other owner's title as to any portion of the land included in any such operating unit, such portion of such land shall likewise be excluded from any such operating unit unless and until Lessee has actual account for any production allocated to any lands excluded from any such operating unit prior to the discovery thereon of the commencement of the drilling of a well on lands included in any such operating unit but prior to the discovery thereon of the substance for which the unit was formed, or at any time after the abandonment of all wells drilled on such unit, wholly dissolve such unit by executing a Declaration of Dissolution. Promptly after execution of such Declaration of Dissolution Lessee shall give written notice thereof to Lessor. Upon the dissolution of any such operating unit, whether or not this lease or any other lease involved therein remains in effect, all rights of Lessor hereunder to royalty on pooled substances produced from the lands which were so pooled (other than the leased land) shall cease and terminate; but such dissolution shall not otherwise affect or impair any of Lessee's rights or obligations under this lease, including its right to create a new operating unit or units out of the lands previously pooled pursuant to this paragraph, or constitute a surrender of any part of or any interest in the leasehold estate created hereby. The sale, conveyance or other transfer of, or of any interest in, any portion or portions of the leased land which are at the time of such transfer subject to an operating unit shall (unless the instrument effecting such transfer expressly provides otherwise) be deemed to include and shall operate as a transfer and assignment of all of the transferor's interest, rights and benefits under this lease (including the right to royalty on allocated production from the lands subject to any such unit) insofar as such interest, rights and benefits pertain to or are allocable hereunder to the portion or portions of the leased land or interest therein so transferred.

29. The words "drilling operations" as used in this lease include, in addition to actual drilling, any work undertaken or commenced in good faith if followed diligently and in due course by the construction of a derrick or other necessary structures for the drilling of an oil or gas well, and by the actual operations of drilling in the ground.

30. In the event that Lessee drills a water well on the leased land for the production of water for its operations which will remove the leased land, Lessee agrees that if said well is no longer desired by Lessee or upon the termination of this lease it will remove the pump, tubing and power plant from said water well and will cap the surface casing and otherwise leave same in such condition as may be required by any law or regulation, but otherwise will leave said well in such condition that Lessor may subsequently equip the well for the production of water for Lessor's own use.

31. On the expiration or sooner termination of this lease Lessee shall quietly and peacefully surrender possession to Lessor and file for record a quitclaim deed, in the County Recorder's office of said County and State.

32. If more than one person is named as Lessor herein and one or more of them fails to execute this lease, it shall, nevertheless (if accepted by Lessee) become effective as a lease from each such Lessor as may have executed the same.

33. This lease may be executed in any number of counterparts and all such counterparts shall be deemed to constitute a single lease and the execution of one counterpart by any Lessor shall have the same force and effect as if he had signed all the other counterparts.

34. This lease and all its terms, conditions and stipulations shall extend to and be binding upon all the heirs, successors and assigns of said Lessor and Lessee.

IN WITNESS WHEREOF, said parties have caused this lease to be duly executed as of the date first hereinabove written.

PEOPLES TEMPLE OF THE DISCIPLES  
OF CHRIST

McFarland Energy, Inc.

BX:

President

BY:

M. K. Sanford - Contract Agent

BY:

Secretary

LESSEE

LESSOR

STATE OF CALIFORNIA } ss.  
County of \_\_\_\_\_

On \_\_\_\_\_ before me, the undersigned, a Notary Public in and for said County and State, personally appeared \_\_\_\_\_

known to me to be the person whose name \_\_\_\_\_ subscribed to the within instrument and acknowledged that \_\_\_\_\_ executed the same.

(SEAL)

Notary Public

Type or Print Name of Notary

My Commission Expires: \_\_\_\_\_

STATE OF CALIFORNIA } ss.  
County of \_\_\_\_\_

On \_\_\_\_\_ before me, the undersigned, a Notary Public in and for said County and State, personally appeared \_\_\_\_\_

known to me to be the \_\_\_\_\_ Secretary of \_\_\_\_\_

President, and \_\_\_\_\_ known to me to be the \_\_\_\_\_

the corporation that executed the within instrument, and known to me to be the persons who executed the within instrument on behalf of the corporation therein named, and acknowledged to me that such corporation executed the same pursuant to its by-laws or a resolution of its board of directors.

(SEAL)

Notary Public

Type or Print Name of Notary

My Commission Expires: \_\_\_\_\_

EXHIBIT "A"

THE West 50 feet of the East 150 feet of the North 140 feet of the following described property:

A tract of land situated in the County of San Joaquin, State of California, in Sections 11 and 12 of C. M. Weber Grant, and being a portion of Lots 111 and 112 of MOSSWOOD PARK, as per map filed in Book of Maps, Volume 6 at Page 52, San Joaquin County Records, and more particularly described as follow, to-wit:

BEGINNING at an iron pipe at the intersection of the East line of Odell Avenue shown on said Map of Mosswood Park, with the South line of Clayton Avenue as shown on Map "C" Mosswood Park, filed in Book of Maps, Volume 11, Page 4, San Joaquin County Records; thence along the said South line of Clayton Avenue, North  $71^{\circ} 08'$  East 308.68 feet to an iron pipe; thence along the Southerly extension of the West line of Mary Avenue, South  $17^{\circ} 52'$  East 340.47 feet to an iron pipe; thence South  $26^{\circ} 38'$  West 66.87 feet to an iron pipe at the North west corner of the 25.00 acre tract shown on Map of Survey filed in Book of Surveys, Volume 6, at Page 145, San Joaquin County Records; thence along the Westerly line of said 25.00 acre tract, South  $17^{\circ} 52'$  East 202.65 feet to an iron pipe; thence South  $71^{\circ} 08'$  West 261.60 feet to a point in the East line of Odell Avenue; thence North  $17^{\circ} 52'$  West 590 feet to the point of beginning.

INITIAL

BB-31-b-235

CALIFORNIA DEPARTMENT OF CORRECTIONS  
**CERTIFICATE OF DISCHARGE**

**LOWERY, Melvin J.** B-72638  
Name Number

**October 26, 1978**  
Date

The above-named person has been discharged from the custody of the California Department of Corrections on all existing felony commitments as of this date.

35

DEPARTMENT OF CORRECTIONS STATE OF CALIFORNIA

The card at left is your Certificate of Discharge which is to be kept in your possession. The back of the card lists the telephone numbers of the Regional Parole offices for your use. These offices may be contacted if you have any questions or problems.

*The card is removed by tearing along the perforated lines.*

B. 1 7

Upon your discharge from any California Department of Corrections institution, certain services are available to you through the Parole Division of the Department of Corrections. These may be secured at any Parole Division office in any community where such an office is located.

The services that are available include assistance in securing housing, employment and/or financial aid to purchase tools necessary to secure and/or maintain employment. Letters of reference and/or referral can also be written. Information regarding various agencies or persons who can provide

clarification of your legal status and present responsibilities can also be provided. Counseling or discussion of problems and concerns and potential educational and/or vocational referral is also offered.

Your successful re-entry into the community is our wish, and we offer those services and whatever form of assistance is possible to achieve that result.

DIRECTOR OF CORRECTIONS

BB-31-6-236

Department of the Treasury  
 Internal Revenue  
 Service Center  
 FRESNO, CA 93888

49672 54

Date of This Notice  
 OCT. 23, 1978

7841

Social Security Number on Return  
 555-92-2939\*

SHANDA M & BRUCE OLIVER  
 % CHALKIN  
 PO BOX 15156  
 SAN FRANCISCO CA 94115

Document Locator Number  
 94263-266-80020-8

◀ If you inquire about  
 your account, please  
 refer to these num-  
 bers.

Form Number Year Ended  
 2353

VERIFICATION OF YOUR SOCIAL SECURITY NUMBER OR NAME

We are unable to complete the processing of your income tax return for the above year because the social security number or last name on it is different from our records. Please supply the information requested below. If you filed a joint return, give information for the first person named above. Please reply soon, as it will take several weeks to make corrections, to issue any refund to you, or to credit your account. An addressed envelope is enclosed for your convenience. Thank you for your cooperation.

2 555922939\*

94 OLIV 2EB 77

Please print in dark ink or use typewriter.		SOCIAL SECURITY NUMBER	
FULL NAME (First) (Middle, or initial—if none, draw line—) (Last)			
NAME AS SHOWN ON YOUR LAST SOCIAL SECURITY CARD. IF UNKNOWN, YOUR NAME AT BIRTH (First) (Middle, or initial—if none, draw line—) (Last)			
DATE OF BIRTH (Month) (Day) (Year)	BIRTH DATE PREVIOUSLY REPORTED (If different from item 3)		
PLACE OF BIRTH (City) (County) (State)	SEX: <input type="checkbox"/> MALE <input type="checkbox"/> FEMALE		
MOTHER'S FULL NAME AT HER BIRTH (Her maiden name)	FATHER'S FULL NAME (Regardless of whether living or dead)		
WHERE AND WHEN DID YOU GET YOUR FIRST SOCIAL SECURITY CARD? (State)	(Year)		
YOUR PRESENT MAILING ADDRESS (Number and Street, Apt. No., P.O. Box, or Rural Route) (City) (State) (ZIP Code)			
TODAY'S DATE	NOTICE: Whoever, with intent to falsify his or someone else's true identity, willfully furnishes or causes to be furnished false information in applying for a social security number is subject to a fine of not more than \$1,000 or imprisonment for up to 1 year, or both.		
TELEPHONE NUMBER	Sign YOUR NAME HERE (Do not print)		

T555922939 77 2

Form 3912 (Rev. 10-76)

BB-31-6-237

Internal Revenue Service  
District Director

Department of the Treasury

Date: October 24, 1978

Person to Contact:  
IA 7824 MY  
Contact Telephone Number:

(415) 556-3116  
Office Address:  
OFFICE BUILDING  
450 GOLDEN GATE AVENUE  
BOX 35030  
SAN FRANCISCO, CALIFORNIA 94102  
Tax Period(s):  
7512  
Balance Due:  
734.59

▷ Annette Jones  
% Eugene Chaiken ESQ  
PO Box 15156  
San Francisco, CA 94115

We have been unable to reach you by telephone to discuss the tax liability indicated above.

It is important that you contact our office as soon as possible between the hours of 8:30 a.m. and 4:00 p.m. We can be reached at the above number.

It will not be necessary for you to call if you pay the balance due at the address shown above within 10 days.

If we do not hear from you or receive your payment, it may be necessary to collect this amount by attachment of your salary, bank account or other assets.

Sincerely yours,

C. Turner

BB-31-b-238

Department of the Treasury  
Internal Revenue  
Service Center

FRESNO, CA 93888

KV

7841

DANNY & EDITH KUTULAS  
% EUGENE CHAIKIN ESQ  
PO BOX 15156  
SAN FRANCISCO CA 94115

Date of This Notice

13868 21

OCT. 23, 1978  
Taxpayer Identifying Number

565-26-4945 KV  
Document Locator Number

94247-248-70102-8  
Form Number Tax Period

1040 DEC. 31, 1974

If you inquire about  
your account, please  
refer to these num  
bers or attach this  
notice

2

STATEMENT OF ADJUSTMENT TO YOUR ACCOUNT

BALANCE DUE ON ACCOUNT BEFORE ADJUSTMENT		\$ .00
ADJUSTMENT COMPUTATION		
TAX- DECREASE	519.96	
PENALTY- DECREASE SEE EXPLANATION 01	5.31	
PENALTY- DECREASE SEE EXPLANATION 30	7.80	
REDUCTION OF INTEREST PREVIOUSLY CHARGED	58.02	
NET ADJUSTMENT CREDIT		591.09
OVERPAYMENT		\$591.09

24

The numbers at the left identify the codes on the back  
← of this notice that provide further explanations and instructions.

BB-31-6-239

Form 4188 (Part 1) (Rev. 3-77)

Department of the Treasury  
Internal Revenue Service

Date of This Letter  
10-27-78  
Social Security Number  
292-24-3431 JS  
Document Locator Number  
94247-240-01115-8

If you inquire about  
your account, please  
refer to these numbers  
or attach this letter

PATRICIA P. CARTMELL  
ES0 PO BOX 15156  
SAN FRANCISCO, CA 94115

502 A89 9401

Dear Taxpayer:

We have previously written to you about the Federal tax shown below. It is overdue and you should pay the total amount due within 10 days from the date of this letter to avoid additional interest and penalties.

Please make your check or money order payable to the Internal Revenue Service and write your social security number on it. Include this letter with your payment so we can quickly identify and credit your account. If you think the amount shown below is incorrect because of a recent payment or for any other reason, please send us the amount you believe is due and explain the difference on the back of this letter. Use the enclosed envelope to mail us your payment. The copy of this letter is for your records.

If you cannot pay this amount in full, please refer to the enclosed copy of Publication 586A, The Collection Process (Income Tax Accounts), which provides information about our collection procedures and your rights in relation to them. If you have other questions about this bill, or want to discuss payment, please contact any Internal Revenue Service office within 10 days from the date of this letter. The telephone number is on the enclosed notice.

Sincerely yours,

Director, Service Center

Enclosures:  
Envelope  
Copy of this letter  
Publication 586A  
Telephone Number Notice

Tax Form Number . . . . . 1043A  
Tax Period Ended . . . . . 12-31-75

Balance of Prior Assessments \$	39.60
Late Payment Penalty . . . . .	.17
Interest . . . . .	.19
Total Amount Due . . . . . \$	39.96

Reply to:  
INTERNAL REVENUE SERVICE  
P.O. BOX 12586  
FRESNO, CA 93778

30-7512

BB-31-b-240

D3967 (Part 1) (Rev. 8-77)



TABLE  
CHICAGO TITLE INSURANCE COMPANY  
PRELIMINARY REPORT

At the date hereof exceptions to coverage, in addition to the printed exceptions and exclusions contained in said policy form, would be as follows:

1. General and special County taxes, including personal property taxes, if any, have been paid:
 

Fiscal year	: 1977-1978
Accounts for pro-ration purposes are:	
Total	: \$607.63
First installment	: 303.32
Personal property taxes	: None
Second installment	: 303.01
Code and Parcel	: 1198 6025-26-21
  
2. Such easements or rights as the City of Los Angeles, successor to Los Angeles Gas and Electric Corporation, may have in or over that portion of said land stated herein, for pole lines, conduits and incidental purposes, as disclosed by a Declaration by the Department of Water and Power of the City of Los Angeles, recorded in Book 15294 Page 87, Official Records.
 

Affects	: Rear 5 feet
---------	---------------
  
3. Covenants, conditions and restrictions, (deleting therefrom any restrictions based on race, color, or creed), as provided in deed recorded in Book 12346 Page 41, Official Records.
 

Said covenants, conditions and restrictions provide that a violation thereof shall not defeat nor render invalid the lien of any mortgage or deed of trust made in good faith and for value.
  
4. A deed of trust to secure an indebtedness.
 

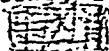
Amount	: \$15,900.00
Trustor	: Earnest Jones and Annie H. Jones, husband and wife
Trustee	: Title Insurance and Trust Company, a California corporation
Beneficiary	: Santa Barbara Mutual Building and Loan Association, a corporation of
Dated	: September 6, 1963
Recorded	: October 3, 1963 as Instrument No. 322, in Book T3288 Page 151, Official Records
  
5. A deed of trust to secure an indebtedness.
 

Amount	: \$3,100.00
Trustor	: Earnest Jones and Annie J. Jones, husband and wife 613-5527
Trustee	: Security First National Bank, a national banking association 616 4403
Beneficiary	: Herbert K. Fonce and Carmen S. Fonce, husband and wife, as joint tenants
Dated	: September 5, 1963
Recorded	: October 3, 1963 as Instrument No. 323, in Book T3288 Page 154, Official Records

Said deed of trust, by its terms, is made subject to the deed of trust mentioned in exception

FORM 2002 (10-74)

66-218 11004-7



BB-31-b-241

U.S. Treasury  
Revenue Service

SAN FRANCISCO, CA 93888

IN REPLY REFER TO: 89630327  
SEPT 27, 1978 LTR 125C N 7642

FORREST R & AGNES P JONES  
2 PO BOX 15156  
SAN FRANCISCO, CA 94115

161305

CERTIFIED MAIL

SOCIAL SECURITY NUMBER: 402-52-8880  
FORM NUMBER: 1040  
TAX PERIOD ENDED: DEC. 31, 1973

DEAR MR. & MRS. JONES:

WE ARE SORRY, BUT WE CANNOT ALLOW YOUR CLAIM, WHICH WE RECEIVED  
MAY 15, 1978. THIS IS YOUR LEGAL NOTICE THAT YOUR CLAIM IS  
DISALLOWED.

YOUR INCOME TAX RETURN, SHOWING AN OVERPAYMENT, WAS FILED MORE THAN  
3 YEARS AFTER ITS DUE DATE. THE LAW DOES NOT PROVIDE FOR REFUNDING  
OR CREDITING TAX THAT WAS PAID MORE THAN 3 YEARS BEFORE THE FILING  
OF THE CLAIM (IN THIS CASE, YOUR RETURN). FOR THIS PURPOSE WITHHELD  
TAX AND ESTIMATED TAX, SHOWN AS CREDITS ON A RETURN, ARE CONSIDERED  
PAID ON THE DUE DATE OF THE RETURN.

IF YOU WISH TO BRING SUIT OR PROCEEDINGS FOR THE RECOVERY OF ANY TAX,  
PENALTIES, OR OTHER MONEYS FOR WHICH THIS DISALLOWANCE NOTICE IS  
ISSUED, YOU MAY DO SO BY FILING SUCH A SUIT WITH THE UNITED STATES  
DISTRICT COURT HAVING JURISDICTION, OR THE UNITED STATES COURT OF  
CLAIMS. THE LAW PERMITS YOU TO DO THIS WITHIN 2 YEARS FROM THE  
MAILING DATE OF THIS LETTER.

WE HOPE THIS INFORMATION WILL HELP YOU. IF YOU HAVE ANY QUESTIONS  
AND WISH TO CALL AT 209-488-6171, B. AREIA WILL BE ABLE  
TO HELP YOU. SINCE THERE WILL BE A LONG-DISTANCE CHARGE TO YOU IF  
YOU ARE BEYOND THE IMMEDIATE DIALING AREA OF THE SERVICE CENTER, YOU  
MAY PREFER TO WRITE US AT THE ADDRESS ON THIS LETTER OR CALL ANY  
INTERNAL REVENUE SERVICE OFFICE.

SINCERELY YOURS,

  
FREDRIC P. PERDUE  
DIRECTOR, SERVICE CENTER

BB-31-6-242

Department of the Treasury  
Internal Revenue Service

FRESNO, CA 93888

IN REPLY REFER TO: 89630327  
SEPT. 27, 1978 LTR 125C N 7642

FORREST R & AGNES P JONES  
% PO BOX 15156  
SAN FRANCISCO, CA 94115

101396

CERTIFIED MAIL

SOCIAL SECURITY NUMBER: 402-52-8880  
FORM NUMBER: 1040  
TAX PERIOD ENDED: DEC. 31, 1972

DEAR MR. & MRS. JONES:

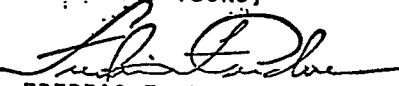
WE ARE SORRY, BUT WE CANNOT ALLOW YOUR CLAIM, WHICH WE RECEIVED MAY 15, 1978. THIS IS YOUR LEGAL NOTICE THAT YOUR CLAIM IS DISALLOWED.

YOUR INCOME TAX RETURN, SHOWING AN OVERPAYMENT, WAS FILED MORE THAN 3 YEARS AFTER ITS DUE DATE. THE LAW DOES NOT PROVIDE FOR REFUNDING OR CREDITING TAX THAT WAS PAID MORE THAN 3 YEARS BEFORE THE FILING OF THE CLAIM (IN THIS CASE, YOUR RETURN). FOR THIS PURPOSE WITHHELD TAX AND ESTIMATED TAX, SHOWN AS CREDITS ON A RETURN, ARE CONSIDERED PAID ON THE DUE DATE OF THE RETURN.

IF YOU WISH TO BRING SUIT OR PROCEEDINGS FOR THE RECOVERY OF ANY TAX, PENALTIES, OR OTHER MONEYS FOR WHICH THIS DISALLOWANCE NOTICE IS ISSUED, YOU MAY DO SO BY FILING SUCH A SUIT WITH THE UNITED STATES DISTRICT COURT HAVING JURISDICTION, OR THE UNITED STATES COURT OF CLAIMS. THE LAW PERMITS YOU TO DO THIS WITHIN 2 YEARS FROM THE MAILING DATE OF THIS LETTER.

WE HOPE THIS INFORMATION WILL HELP YOU. IF YOU HAVE ANY QUESTIONS AND WISH TO CALL AT 209-488-6171, B. AREIA WILL BE ABLE TO HELP YOU. SINCE THERE WILL BE A LONG-DISTANCE CHARGE TO YOU IF YOU ARE BEYOND THE IMMEDIATE DIALING AREA OF THE SERVICE CENTER, YOU MAY PREFER TO WRITE US AT THE ADDRESS ON THIS LETTER OR CALL ANY INTERNAL REVENUE SERVICE OFFICE.

SINCERELY YOURS,

  
FREDRIC F. PERDUE  
DIRECTOR, SERVICE CENTER

BB-31-6-243

LAW OFFICES  
**STAMBLER & SHRINSKY, P. C.**  
SUITE 270  
1120 CONNECTICUT AVENUE, N. W.  
WASHINGTON, D. C. 20036

ARTHUR STAMBLER  
JASON L. SHRINSKY  
JAMES M. WEITZMAN \*  
BRUCE A. EISEN

\* NOT ADMITTED IN D. C.

TELEPHONE  
(202) 872-0010  
CABLE ADDRESS  
"TELERADIO"

October 26, 1978

Marshall R. Bentzman, Esq.  
1256 Market Street  
San Francisco, California 94102

Re: Peoples Temple/WB6MID

Dear Marshall:

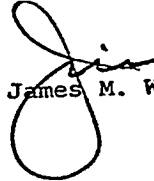
The file which the Commission has on Peoples Temple and related activities is immense. We have examined not only the materials which the Commission has agreed to release to us but other files as well, including those containing thousands upon thousands of letters in support of the Peoples Temple.

Of primary interest to you will be a three-inch thick internal FCC correspondence file. This file contains copies of FCC intercepts, monitoring assignments conducted by members of the Field Operations Bureau, personal inspections of the Peoples Temple as well as complaints filed by members of the public against the Peoples Temple. The file is too voluminous to describe here. We have made arrangements to copy all of those documents which we feel may be of interest to you and your client.

These should follow in approximately one week.

Parenthetically, in our examination of the files, we did not see any letter from Barry Goldwater although we are digging deeper since we know it exists. We will be back to you shortly.

Sincerely,



James M. Weitzman

BB-31-6-244

STATEMENT ~~OF~~ IN RE CUSTODY OF JOHN VICTOR STOEN

To Whom It May Concern:

I, Timothy G. Stoen, declare and certify as follows:

I am the legal father of John Victor Stoen, a minor of the age

of 5 years, born 25 January 1977. The legal mother of said minor is

Grace ~~Stoen~~ Stoen. The purpose of this statement is to show <sup>why</sup> ~~that~~ Grace

Stoen is unfit to be awarded the custody of said minor should she ~~be~~ file a ~~custody or divorce action~~ in a Guyana court; and (2) to show to the government of Guyana <sup>that she is a dangerous reactionary who has indicated she would work with the Central Intelligence Agency to destabilize any socialist country</sup> ~~in July 1976~~ Grace Stoen abandoned said minor and ran off with <sup>of light skin and light hair</sup> ~~another man~~.

She indicated <sup>to me and others</sup> before she left that she wanted said minor

to live ~~in~~ <sup>in</sup> Jonestown, Northwest District, Guyana, South America under the pastoral care of Rev. James W. Jones. ~~She left the~~

The man Grace Stoen ran off with <sup>is a reactionary / who by word and deed</sup> ~~is~~ totally opposed to Socialism. Grace Stoen has herself <sup>become</sup> a reactionary

racist who by word and deed is totally opposed to Socialism. <sup>After ~~leaving~~ she ~~has~~ indicated</sup> ~~that she would work for the CIA to help bring to me that she would use a capitalist who didn't want to share, and would work with the U.S. Central Intelligence Agency "to make things rough" for~~ In September 1976 Grace Stoen reaffirmed to me and others her

desire that said minor live in Guyana under the care of Pastor Jones.

Said minor was brought to come to live in Guyana in September 1976,

where he has remained ever since. Grace Stoen was given a round

trip air ticket to visit her said minor in Guyana.

BB-31-6-245

PARENTAL CONSENT AND POWER OF ATTORNEY

STATE OF CALIFORNIA )  
COUNTY OF MENDOCINO ) ss.  
UNITED STATES OF AMERICA )

We, Timothy Oliver Stoen and Grace Lucy Stoen, Hereby

Declare;

1. ~~We are~~ The natural ~~father and mother, respectively~~  
Of Jon Victor Stoen  
Born January 25, 1972
2. We Consent to our son, Jon Victor Stoen, going  
to Guyana, South America, to live and be cared for there under  
the Guardianship or custody of \_\_\_\_\_.

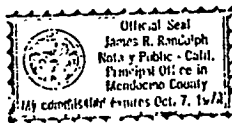
I hereby appoint \_\_\_\_\_ of \_\_\_\_\_, California  
and \_\_\_\_\_ of \_\_\_\_\_, California and \_\_\_\_\_  
of \_\_\_\_\_, California as my attorney-in-fact  
jointly and severally to take any and all action any of them deem fit with  
respect to said minor. This power of attorney shall give any of the aforesaid  
attornies-in-fact the right to travel with said minor anywhere throughout the  
world.

Dated at Redwood Valley, California, this 18th day  
of December, 1974

\_\_\_\_\_  
Timothy Oliver Stoen  
Grace Lucy Stoen  
Grace Lucy Stoen

STATE OF CALIFORNIA )  
COUNTY OF MENDOCINO ) ss.  
UNITED STATES OF AMERICA )

On December 18, 1974 before me, the Undersigned,  
A Notary Public in and for said County and State, personally appeared  
~~Timothy Oliver and Grace Lucy Stoen~~, known to me to  
be the person whose name ~~are~~ subscribed to the within instru-  
ment, and acknowledged to me that they executed the same.  
WITNESS MY HAND AND OFFICIAL SEAL.



James R. Randolph  
James R. Randolph Notary Public

BB-31-6-245

STATE OF CALIFORNIA )  
COUNTY OF ) ss.  
UNITED STATES OF AMERICA)

On March 9th before me, the Undersigned,  
A Notary Public in and for said County and State, personally appeared  
Grace L. Stoen and Timothy Stoen known to me to be the  
person whose names are subscribed to the within instruments and acknow-  
ledged to me that they executed the same.

WITNESS MY HAND AND OFFICIAL SEAL.



*James R. Randolph*

BB-31-6 - 247

PARENTAL CONSENT  
AND POWER OF ATTORNEY

STATE OF CALIFORNIA )  
COUNTY OF Mendocino ) ss.  
UNITED STATES OF AMERICA)

I, Grace L. Stoen and Timothy Stoen hereby declare:

1. I am the natural parent /XXXXXXXXXX/  
of John Stoen, a minor, born April 27, 1974.
2. I hereby consent to said minor going to Guyana, South America, to live  
and be cared for there under the Guardianship or custody of           
Joyce Touchette.

I hereby appoint Sharon Cobb of Redwood Valley, Calif.  
and Jim Jones of S. F., Calif.  
and Helen Swinney of Redwood Valley, Calif.

as my attorneys-in-fact, jointly and severally, to take any and all action  
any of them deem fit for the welfare of said minor. By this power of attor-  
ney, I give each of the aforesaid attorneys-in-fact the right to the care,  
custody, supervision, and control of said minor anywhere throughout the world,  
and to travel anywhere with said minor throughout the world.

Executed on this 9th day of March,  
1976, at Ukiah, California

SIGNED Grace L. Stoen  
Timothy Stoen

Wkr \_\_\_\_\_

6



14. Details of any farming experience... N/A.....

The applicant is a member of Peoples Temple's Agricultural Mission in Guyana. All such applications are to be processed through the Ministry of Home Affairs.

Declaration: I certify that to the best of my knowledge and belief the foregoing statements are true and made in good faith.

*Grace L. Stone*  
Signature.

\* The applicant is also requested to submit, together with the information furnished above, a certificate from the police authority of the country (or countries) where he (she) has been resident during the last ten (10) years, to the effect that there has been no conviction against him (her).

BB-31-6-248

S.3/4/h

\* Information to be supplied by persons  
desirous of immigration into Guyana.

1. Full Name (Block Capitals, surnames first)..... STOER, Jon Victor
2. Address..... 6300 Eastside Calpella Road, P.O. Box 126 Ukiah, Calif.
3. Nationality..... U.S.A.
4. Date of Birth..... January 25, 1972
5. Place of Birth..... Santa Rosa, California
6. Profession, trade or occupation..... N/A
7. Married or single..... Single
8. Wife's (Husband's) name and nationality..... N/A
9. Names and dates of birth of dependent children..... N/A
10. Schools and other educational institutions attended and periods of attendance  
..... N/A
11. Academic, Professional, Technical, and other qualifications..... N/A
12. Assets (including cash)..... Assets are to be imputed to the Peoples Temple  
Agricultural Mission in Guyana (which has leased land under the  
Government's FCH program).
13. State whether you are prepared to work and live in the interior of Guyana  
Yes

14. Details of any farming experience... N/A

The applicant is a member of Peoples Temple's Agricultural Mission in Guyana. All such applications are to be processed through the Ministry of Home Affairs.

Declaration: I certify that to the best of my knowledge and belief the foregoing statements are true and made in good faith.

*Grace L. Stace*  
Signature.

\* The applicant is also requested to submit, together with the information furnished above, a certificate from the police authority of the country (or countries) where he (she) has been resident during the last ten (10) years, to the effect that there has been no conviction against him (her).

BB-31-b-249

8/3/74

\* Information to be supplied by persons  
destinuous of immigration into Guyana.

1. Full Name (Block Capitals, surnames first).....STOEN, Jon Victor.....
2. Address.....6300 Eastside Calpella Road, P.O. Box 126 Ukiah, Calif.....
3. Nationality.....U.S.A.....
4. Date of Birth.....January 25, 1972.....
5. Place of Birth.....Santa Rosa, California.....
6. Profession, trade or occupation.....N/A.....
7. Married or single.....Single.....
8. Wife's (Husband's) name and nationality.....K/A.....
9. Names and dates of birth of dependent children.....N/A.....
10. Schools and other educational institutions attended and periods of attendance  
.....N/A.....
11. Academic, Professional, Technical, and other qualifications.....N/A.....
12. Assots (including cash).....Assets are to be imputed to the Peoples Temple  
Agricultural Mission in Guyana (which has leased land under the  
Government's FCH program).
13. State whether you are prepared to work and live in the interior of Guyana  
Yes

PARENTAL CONSENT AND POWER OF ATTORNEY

STATE OF CALIFORNIA )  
COUNTY OF MENDOCINO ) ss.  
UNITED STATES OF AMERICA )

We, Timothy Oliver Stoen and Grace Lucy Stoen, Hereby  
Declare;

1. ~~We are~~ The natural ~~father and mother respectively~~  
Of Jon Victor Stoen  
Born January 25, 1972
2. We Consent to our son, Jon Victor Stoen, going  
to Guyana, South America, to live and be cared for there under  
the Guardianship or custody of \_\_\_\_\_

I hereby appoint \_\_\_\_\_ of \_\_\_\_\_, California  
and \_\_\_\_\_ of \_\_\_\_\_, California and \_\_\_\_\_  
\_\_\_\_\_ of \_\_\_\_\_, California as my attorney-in-fact  
jointly and severally to take any and all action any of them deem fit with  
respect to said minor. This power of attorney shall give any of the aforesaid  
attornies-in-fact the right to travel with said minor anywhere throughout the  
world.

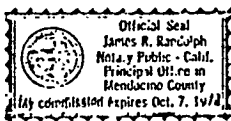
Dated at Redwood Valley, California, this 18th day  
of December, 1974

\_\_\_\_\_  
Timothy Oliver Stoen

Grace Lucy Stoen  
Grace Lucy Stoen

STATE OF CALIFORNIA )  
COUNTY OF MENDOCINO ) ss.  
UNITED STATES OF AMERICA )

On December 18, 1974 before me, the Undersigned,  
A Notary Public in and for said County and State, personally appeared  
~~Timothy Oliver and Grace Lucy Stoen~~, known to me to  
be the person whose name are subscribed to the within instru-  
ment, and acknowledged to me that they executed the same.  
WITNESS MY HAND AND OFFICIAL SEAL.



James R. Randolph  
James R. Randolph Notary Public

BB-31-6-250

RELEASE

I hereby declare I am the Mother of Paul McCartney and have full legal custody thereof, and enter into this release of liability with respect to myself and said \_\_\_\_\_.

I hereby release Peoples Temple of the Disciples of Christ, a California corporation, and any and all of its members, and Pastor Jim V. Jones, of any and all liability, claims, causes, and causes of action arising out of and/or relating to said \_\_\_\_\_ travels to and from and visit in any and all foreign countries, including Guyana, South America, including but not limited to the airplane flights to and from said destination and accompanying means of transportation while there.

In the event that I should elect that \_\_\_\_\_ remain for a period of time at such destination, including Guyana, South America, I herewith release Peoples Temple of the Disciples of Christ, a California corporation, and any and all of its members, and Pastor Jim V. Jones, of any and all liability, claims, causes, and causes of action arising out of and/or related to \_\_\_\_\_ activities, travel, and any illnesses that might arise by natural or other causes, while there.

I hereby acknowledge that I have requested said corporation and said members and said Pastor that \_\_\_\_\_ may go on said trip and to remain in said places. If \_\_\_\_\_ is permitted to remain at any such place, I hereby promise on \_\_\_\_\_ behalf that \_\_\_\_\_ will work diligently and in full cooperation with all leadership appointed by said Pastor, directly or indirectly, and will keep a cheerful and constructive attitude at all times. If \_\_\_\_\_ fails to keep this promise, it is understood that I will be solely responsible for any and all costs and other obligations incurred in \_\_\_\_\_ returning from, as well as going to and living in said place.

I declare under penalty of perjury that the foregoing is true and correct. Executed on \_\_\_\_\_ at \_\_\_\_\_.

Grace Stein

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_.

Notary Public

RELEASE

I hereby declare I am the Judicial of John Victor Blum and have full legal custody thereof, and enter into this release of liability with respect to myself and said \_\_\_\_\_.

I hereby release Peoples Temple of the Disciples of Christ, a California corporation, and any and all of its members, and Pastor Jim V. Jones, of any and all liability, claims, causes, and causes of action arising out of and/or relating to said \_\_\_\_\_ travels to and from and visit in any and all foreign countries, including Guyana, South America, including but not limited to the airplane flights to and from said destination and accompanying means of transportation while there.

In the event that I should elect that \_\_\_\_\_ remain for a period of time at such destination, including Guyana, South America, I herewith release Peoples Temple of the Disciples of Christ, a California corporation, and any and all of its members, and Pastor Jim V. Jones, of any and all liability, claims, causes, and causes of action arising out of and/or related to \_\_\_\_\_ activities, travel, and any illnesses that might arise by natural or other causes, while there.

I hereby acknowledge that I have requested said corporation and said members and said Pastor that \_\_\_\_\_ may go on said trip and to remain in said places. If \_\_\_\_\_ is permitted to remain at any such place, I hereby promise on \_\_\_\_\_ behalf that \_\_\_\_\_ will work diligently and in full cooperation with all leadership appointed by said Pastor, directly or indirectly, and will keep a cheerful and constructive attitude at all times. If \_\_\_\_\_ fails to keep this promise, it is understood that I will be solely responsible for any and all costs and other obligations incurred in returning from, as well as going to and living in said place.

I declare under penalty of perjury that the foregoing is true and correct. Executed on \_\_\_\_\_ at \_\_\_\_\_.

Grace Stoen

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Notary Public

RELEASE OF LIABILITY

I, Grace L. Stoen, do hereby release Peoples Temple of the Disciples of Christ, its Pastor, its bus drivers, and all members of said church from any and all liability for any injuries resulting in any acts of commission or omission occurring while I am in any way engaged in an activity or on any trip sponsored directly or indirectly by Peoples Temple Christian Church.

I sign this freely, willingly, and under no duress.

Grace L. Stoen  
Executed on this 12<sup>th</sup> day of April,  
1976, at Mendocino, California.

ACKNOWLEDGEMENT

STATE OF CALIFORNIA )  
COUNTY OF ) SS.  
UNITED STATES OF AMERICA)

On \_\_\_\_\_ before me, the Undersigned,  
a Notary Public in and for said County and State, personally appeared  
\_\_\_\_\_, known to me to be the  
person whose name \_\_\_\_\_ subscribed to the within instruments and acknow-  
ledged to me that \_\_\_\_\_ executed the same.

WITNESS MY HAND AND OFFICIAL SEAL.

BB-31-b- 254



RELEASE OF LIABILITY

I, Grace L. Stoen do hereby release Peoples Temple of the Disciples of Christ, its Pastor, its bus drivers, and all members of said church from any and all liability for any injuries resulting in any acts of commission or omission occurring while I am in any way engaged in an activity or on any trip sponsored directly or indirectly by Peoples Temple Christian Church.

I sign this freely, willingly, and under no duress.

Grace L. Stoen  
Executed on this 12<sup>th</sup> day of April,  
1975, at Mendocino, California.

ACKNOWLEDGEMENT

STATE OF CALIFORNIA )  
COUNTY OF ) SS.  
UNITED STATES OF AMERICA)

On \_\_\_\_\_ before me, the Undersigned,  
a Notary Public in and for said County and State, personally appeared  
\_\_\_\_\_, known to me to be the  
person whose name \_\_\_\_\_ subscribed to the within instruments and acknow-  
ledged to me that \_\_\_\_\_ executed the same.

WITNESS MY HAND AND OFFICIAL SEAL.

\_\_\_\_\_

BB-31-b-253

ACKNOWLEDGMENT

State of California            )  
  ) SS  
County of \_\_\_\_\_ )

On this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, before me, \_\_\_\_\_  
\_\_\_\_\_, the undersigned officer, personally appeared \_\_\_\_\_,  
known to me to be the person whose name is subscribed to the within instrument acknowledged that he  
executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

\_\_\_\_\_  
Notary Public

BB-31-b-255

Limited Power of Attorney,  
Consent to Travel and Visit, and  
Release of Liability

I, the undersigned, am the natural father / natural mother / legal guardian / natural mother  
of John Victor Steen, a minor of the age of 3 years. I hereby appoint  
Eva Pugh, Jean Brown, and  
Carolyn Layton, as my attorneys-in-fact, jointly and severally, to take  
any and all action any of such deem fit with respect to the welfare and custody of said minor, including  
disciplining, supervising, authorizing medical care and treatment. This limited power of attorney shall be  
effective during the period April 12, 1975 <sup>until</sup> ~~through~~ rescinded by writing at all  
times that said minor is not in my physical custody and is engaged in an activity sponsored directly or  
indirectly by Peoples Temple of the Disciples of Christ, also known as Peoples Temple Christian Church.  
In the event any of the aforesaid attorneys-in-fact are unable or unwilling to act as an attorney-in-fact, he  
or she may designate any other adult member of said church as attorney-in-fact in his or her stead.

I further give my consent to said minor travelling on the buses of said church and to participate in any and  
all transportation and visitation activities sponsored directly or indirectly by said church during the aforesaid  
period of time.

I further release Peoples Temple of the Disciples of Christ, its pastor, its bus drivers, and all members of said  
church from any and all liability for any injuries resulting in any acts of commission or omission occurring  
while said minor is in any way engaged in an activity sponsored directly or indirectly by Peoples Temple  
Christian Church.

Executed on this 12<sup>th</sup> day of April, 1975 at Mendocino, California.

BB-31-b-256

URGENT

P. O. Box 933  
San Francisco, Ca 94101

November 17, 1977

Rev. James Jones  
c/o Mrs. James Jones  
People's Temple  
1859 Geary Blvd.  
San Francisco, Calif.

Re: Return of John Victor Stoen

Dear Jim:

I am asking for your cooperation in delivering John Victor Stoen to Grace Stoen and me in San Francisco by next Friday noon, November 25, 1977. We will, of course, raise John in an inter-racial and sharing environment consistent with the highest teachings.

I have received reliable information to the effect that Grace is being seriously discredited in John's eyes. Not only is this deeply offensive to me, but it could easily cause irreparable emotional harm to John. I ask you to immediately reverse the hate campaign and to advise John repeatedly what you and I both know to be true: That Grace loves him deeply and has never abandoned him. You and I both know, and John should be told, that Grace's leaving the People's Temple was not in any way due to a lack of commitment to the goals of racial equality, economic fairness and social justice.

As a further indication of cooperation, please indicate to Grace's attorney, Jeffrey A. Haas, by telegram not later than Tuesday noon, November 22, 1977, the exact time and flight of John Victor's arrival at San Francisco International Airport. The telegram should be sent to Mr. Haas at 3609 Sacramento St., San Francisco, California 94118. (Telephone: 922-6200)

I am sending a telegram to Clarence Hughes and Lionel Luckhoo in Guyana asking them to be of assistance to you in returning John Victor to us. You may confirm that I am the authentic author of this letter by contacting my attorney, Patrick Hallinan. (Telephone: 861-1151) I know that Marceline Jones and your attorney,

BB-31-6-257

Charles Garry, will be able to convey the verbatim text of this letter to you by telephone and short wave radio immediately.

May the goals we shared be realized at Jonestown.

Very truly yours,

*Timothy O. Stoen*

Timothy O. Stoen

cc: Charles Garry, Attorney at Law

BB-31-6-258

BB-32

Deborah

Touchette

616.00  
story

direct line 60265  
West Street, Georgetown

# PEOPLES TEMPLE of the Disciples of Christ

P.O. Box 893 Georgetown, Guyana

24th November, 1976

Honourable Minister Fred Wills,  
Ministry of Foreign Affairs,  
Carmichael Street, Cummingsburg,  
Georgetown.

Dear Comrade Minister Wills;

This letter is a confirmation to our conversation today (24th Nov., 1976) regarding the visit of Bishop Jim Jones and party of five (5) persons from the United States on the 28th and 29th of December, 1976.

The Bishop, Lieutenant Governor Mervyn Dymally of California, Assistant District Attorney of San Francisco Timothy Stoen, the Head of the U.S. Council of Churches, and one of the Bishop's Associate Ministers Reverend Prokes will be staying at our office in Georgetown located at 121 Third Street, Alberttown.

The following is the itinerary for Bishop Jones and his entourage.

28th December, 1976

9. met at  
airport  
to call back on  
Monday to see  
if arrival date  
is changed

1. Arrival at Timehri International Airport in the early morning hours. 27, 1976
2. Tour of the Peoples Temple Agricultural Mission at Jonestown, Port Kaituma, North West Region; to fly into the farm in the morning, to tour the farm, to have lunch, and to return to Georgetown in the afternoon. 9 AM - 3:30 PM

29th December, 1976

1. Meeting with the Prime Minister at 10:30a.m.
2. Luncheon to be held by the Deputy Prime Minister ~~at 1:00 p.m.~~ 1 PM
3. Tour the University of Guyana. 9:00 - 10:00 AM
4. Reception to be held in Bishop Jones' honour by Sir Lionel Luckhoo.

1-45-68-88

BB-32-2

- a. they will be met at airport by proto and to third st
- b. they will be picked up at 121 third st and taken ✓  
to the meeting w/ P.M. on 29th ✓
- c. Acting foreign m.n. will not be there. out of County - (under R. H.) acting foreign affairs will
- d. D.P.M. will ~~partly~~ cost to the Banquet <sup>could be min Jack or Fred Rilly</sup>
- e. Cannot afford plane to Pat Kautema
- f. will see his off to airport on 29th
- g. will pick up Lt. Gov. to go to Univ.
- h. explanation: Provide car to the whole of 29th in terms of J.I.P. can transport and will see his off. includes: meeting w/ P.M. + D.P.M. + Tom Univ. + Reception w/ Sir Ronald Lucklow



Page 2 - Bishop Jim Jones' December Trip to Guyana

30th December, 1976

1. Return to United States of Lt. Governor Dymally, Assistant District Attorney of San Francisco Timothy Stoen, and Head of the U.S. Council of Churches, Congressman Willie Brown
2. Bishop Jones to return to the Peoples Temple farm for a few extra days <sup>would not</sup> and to depart to the United States at a time to be specified at a <sup>be able to escort him to</sup> later date. ~~He will check to see if he can be escorted to airport~~ <sup>on date that he leaves Guyana</sup>

The following will be needed, as per our discussion, for the Bishop's visit.

28th December, 1976

1. Protocol to meet the aircraft that the Bishop and entourage arrive on.
2. Transport of entourage from Timehri International to Georgetown Peoples Temple office at 121 Third Street, Alberttown.
3. Transportation for entourage to Ogle Airfield for flight to the Peoples Temple farm at Jonestown, Port Kaituma, North West Region. X
4. Air transportation in the morning for the Bishop and entourage and the Honourable Minister Fred Mills to the Peoples Temple farm and return flight to Ogle Airfield in the afternoon.
5. Transportation from Ogle Airfield to Peoples Temple's Georgetown office. X

29th December, 1976

1. Transportation to meeting at 10:30a.m. with the Prime Minister.
2. Transportation to luncheon being held by Deputy Prime Minister ~~\_\_\_\_\_~~
3. Tour organized for Bishop's party to visit the University of Guyana <sup>before</sup> after the luncheon. This was as a special request of the Lt. Governor.
4. Transportation to and from the University of Guyana.
5. ~~Transportation to and from reception to be held by Sir Lionel Luckhoo in honour of Bishop Jones that night (time to be submitted when determined).~~

*Dymally*

30th December, 1976

1. Protocol and transportation for the departure of the Honourable Lt. Governor Dymally, the District Attorney Timothy Stoen, and the Head of the U.S. Council of Churches (in the morning).

BB-32-2-2

To be determined at a later date.

1. Protocol and transportation for the departure of Bishop Jones and Associate Minister Michael Prokes.

Thank you sincerely for your personal attention to Bishop Jones's visit.

Co-operatively yours,

---

Deborah Touchette,  
Administrative Secretary

*Clarne Rice about flight to Jonestown  
Brigidier*

*4-2-83-20*

*BB-32-a-3*

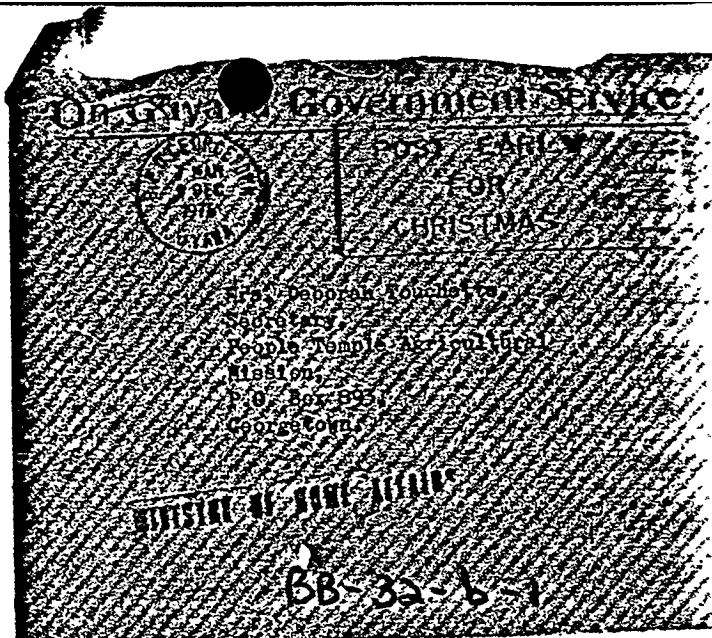
Embassy said they didn't know  
Dymally was coming via friendly Bishop Jones  
Dinner Party on 28th evening.

USIS said the flight he was coming  
on + leaving, @

Must contact him w/in two days  
to give him message as to what to tell  
the American Embassy.  
as to whether they will have time for  
a meeting w/ them or dinner, reception

Let him know the time of ~~Arrival~~  
Departure  
Date, Flight

BB-32-a-4



Cable Address:  
EXTERNAL GUYANA



MINISTRY OF FOREIGN AFFAIRS  
Carmichael Street,  
Georgetown,  
Guyana.

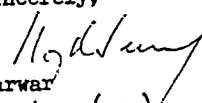
FA:1/35/2

December 6, 1976.

Dear Miss Touchette,

I should be grateful if you could call on me at this office at your earliest convenience to discuss the extent of Government's assistance for the visit of Bishop Jones and the Lieutenant Governor of California. Please telephone my Secretary on 61600 to make an appointment.

Yours sincerely,

  
L. Searwar  
Permanent Secretary (ag.)

Miss Deborah Touchette,  
Administrative Secretary,  
Peoples Temple of the Disciples  
of Christ,  
P.O. Box 893,  
GEORGETOWN.

BB-32-6

File

# PEOPLES TEMPLE of the Disciples of Christ

P.O. Box 893 Georgetown, Guyana

November 18, 1976

Mr. Lloyd Searwar  
Permanent Secretary,  
Ministry of Foreign Affairs  
Carmichael Street  
Georgetown, Guyana.

Dear Comrade Searwar,

The Bishop Jim Jones of the Peoples Temple will be arriving in Guyana on the morning of the twenty-eighth of December, 1976 (The exact flight details will be submitted when known. Accompanying the Bishop will be the Lieutenant Governor of California, U.S.A. Mervyn Dymally; the Assistant District Attorney of San Francisco, California, Timothy Stoen; the Head of the Council of Churches in the U.S.; and one of the Bishop's associate ministers, Michael Prokes.

The Bishop's party wishes to fly into Jonestown, Port Kaituma, North West District, to see the Peoples Temple farm on the morning of December twenty-eighth and to fly back to Georgetown on the same afternoon.

The Bishop and party have an appointment to meet with the Prime Minister, the Honourable Forbes Burnham, at ten thirty A.M. on the twenty-ninth of December.

The Lieutenant Governor Dymally has requested a tour of the University of Guyana for the twenty-ninth of December, which can be arranged around the appointment with the Prime Minister.

An appointment will also be held with the Bishop and the Deputy Prime Minister, Dr. Ptolemy Reid. The time has not yet been confirmed for this.

The departure of the Lieutenant Governor, Assistant District Attorney, and the Head of the Council of Churches will be the morning of December thirtieth and Bishop Jones and Rev. Prokes will be leaving a few days after (to be confirmed at a later date).

Co-operatively Yours,

Deborah Touchette,  
Secretary

BB-32-c

D. T. copy

# PEOPLES TEMPLE of the Disciples of Christ

P.O. Box 893 Georgetown, Guyana

November 24, 1976

Dr. Etolery Reid  
Deputy Prime Minister,  
Ministry of National Development  
Camp Street  
Georgetown, Guyana.

Dear Comrade Minister,

In response to our telephone conversation on the (19th) nineteenth of December, we are submitting these names for the attendance of the luncheon which you so graciously have offered to hold in honour of Bishop Jones and his entourage.

- a. Bishop Jones
- b. Mervyn Dymally (Lieutenant Governor of California)
- c. Timothy Stoen (Assistant District Attorney of San Francisco, California.)
- d. Willie Brown (Congressman of 17th District in California)
- e. Michael Prokes (Associate Minister)
- f. Head of the Council of Churches in U.S.

Accompanying the Bishop from the Guyana office will be;

- g. Charles Touchette (Project Manager of Jonestown Agricultural Mission)
- h. Michael Touchette (Associate Minister and Guyana Council of Churches & Executive Committee Representative)
- i. Deborah Touchette (Administrative Secretary)
- j. Paula Adams (Administrative Secretary)

We will submit a letter at a later date giving all the details concerning the visit of Bishop Jones and his entourage, and at that time submit the names of the other four persons who will be attending the luncheon.

Co-operatively Yours,

Deborah Touchette  
Secretary

BB-32-d



*The Comrade Deputy Prime Minister &  
Minister of National Development  
Cde. P. A. Reid*

requests the pleasure of the company of  
Cde. Michael & Deborah Touchette

for ..... a Luncheon.....

on 29th December, 1976 at 12.00 noon

venue Herdmanston House, 19/20 Lamaha St., Queenstown,  
G/town.

R.S.V.P.  
Tel. 68808  
if unable to attend.

BB-32-2

December 3, 1976

To: Jim Jones (C.C. to Mike Prokes)  
From: Deb and Paula

Itinerary:

1. We originally expected you early morning hours of the 28th of December, but it can easily be changed to December 27th.
2. The tour of Jonestown was scheduled for December 28th for the following reasons:
  - a. To give more support to your meeting with Premier Minister and Luncheon with Dr. Reid. Having seen Jonestown, the Minister of Foreign Affairs, Dymally, and whoever else will have first hand experience to talk from.
  - b. We'd like you to take the time (extra day) in Georgetown to go to the Acupuncture Clinic for your arthritis and whatever else you might be able to take acupuncture treatment for, after Dymally leaves. (If not, perhaps we can look into it being done in Cuba, at a later date)
  - c. The Ministry of Foreign Affairs is paying for the interior flight on the 28th of December, so there would not be a double charter cost (as we know you are concerned about excess expense)
3. The tour of the University of Guyana (which is the only school of "Higher Education" we could think of) was crammed in on the 29th after the luncheon with Dr. Reid because we were told it was only a two-day visit. By leaving it crammed, it would mean a very tiring day, but if it is important that Dr. Reid go on the school tour, the chances are likely greater on that day. We have not yet attempted to get Dr. Reid on the 30th for the tour.
4. The only outgoing flights for either New York or Miami are in the morning. All outgoing commercial flights must be confirmed from U.S.
5. A short background is wanted on all guest by Sir Lionel Luckhoo for this reception he's holding. Mike Prokes should write up a good Biographical on you and a complimentary on the other guest (including himself).

BB-32-6



file

Subject: Meeting With Fred Mills  
Minister of Foreign Affairs  
November 24, 1976

Embassador to Mexico

When we arrived there was an official (important) already in office and the Minister took us in promptly while the official waited.

When we mentioned the luncheon, he said "Oh yes", he already knew about it. Infact he and the Deputy Prime Minister were doing this together and the luncheon will be held at Sophia. Paula said one of his comments was, with the Dr. Reid and I behind it, (In so many words) you'll have no problems).

We told him of our difficulty in getting arrangements made, relating to him the conversation with Froto Call. They had said that since the party was not invited by the Government, we would have to take care of the cost. Minister Mills responded immediately and said he would try to take care of it. He said he would not promise yet, but he would do everything he could. He told us to submit what we needed in letter form that very afternoon and he would take care of it tomorrow. In which case we would come to see him for the results on Friday November twenty-sixth (26th). He promised transportation and said he wanted to handle this whole thing personally. He further stated that from this time on, whenever we write to Ministry of Foreign Affairs, we should address it to him personally. He said this is not usually done, but he will give us this honor.

He recognized us as progressive people and he wishes to accompany Bishop Jones and the party that tours Jonestown.

He said Guyana recieved a letter personally written by the President of the U.S. and that this was something. We told him that was one of the things Bishop Jones had hoped would change was the foreign policy. He answered that he thought Bishop Jones had said or done something because it was really unusual.

The Prime Minister received a letter from Congressman Willie Brown, stating that Bishop Jones had invited him to accompany him to Guyana on the twenty-eighth (28th), and twenty-ninth (29th) of December, and that he would be coming with Ann Ruby Harry, the Prime Minister's secretary called to re-confirm appt at 10:30 on the twenty-ninth (29th), and to tell us that the letter had been received and reservations confirmed. She said the Prime Minister gave this message:

BB-32-6-1

He was sorry he could not spend more time with them and have the luncheon.

Did Congressman Willie Brown inform you he was writing a letter direct, and did he confirm that he still will be coming?

Please send photos of:

- a. Jim Jones
- b. Willie Brown
- c. Mervyn Dymally
- d. Timothy Stoen
- e. Mike Prokes
- f. Head of Council of Churches in U.S.?

All photos should be passport size and in black and white.

BB-32-6-2

PEOPLES TEMPLE  
of the Disciples of Christ

P.O. Box 893 Georgetown, Guyana

November 24, 1970

Dr. Stoley Reid  
Deputy Prime Minister,  
Ministry of National Development  
Camp Street  
Georgetown, Guyana.

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- i. Deborah Touchette (Administrative Secretary)
- j. Paula Adams (Administrative Secretary)

We will submit a letter at a later date giving all the details concerning the visit of Bishop Jones and his entourage, and at that time submit the names of the other four persons who will be attending the luncheon.

Co-operatively Yours,

Deborah Touchette  
Secretary

BB-32-9

David, Prime Ministers Guard  
Fitz "" ""  
W/ Deborah Touchette

Deborah Touchette  
May 21, 1978

- They both came to our open house and had not been invited. although we did invite the P.M. and his wife through calling his residence.
- I told him, David, that we were surprised to see him,
- later in the evening he approached me and said he didn't understand why I had said he wanted information from me, when we had argued the last time he came over. He asked me if I hung up on him the last time he called (When he called me and asked if I wanted the gift he had brought? I had asked if it was for Cde. Jones, for Peoples Temple generally or for me? he said for me and did I want it? I didn't say anything and he hung up the phone. I was obviously irritated) He told me he had brought me a gift from the USSR and wanted to know what had gone wrong between us? I told him I didn't appreciate his approach to friendship, and that I would have to hand it to him, because he was one of the most persistent people that I had ever met, but I felt he was being phony in his approach.
- I told him that I realize anyone in his position was in information gatherer and that was understood.
- He started to protest me calling him an information gatherer and I told him we shouldn't play games and don't try to deny that because in his position we could see how that would be necessary,
- he just smiled slightly
- But we have nothing to hide, but I was vindictive when we spoke last because of his approach in that I said I was married and everytime he called he said "I love you, do you want to marry me ect" I will be a friend as all members of the Peoples Temple, we have welcomed you into our home, but don't come on to me, I don't appreciate it.
- David said he would not talk that way when he called here again
- He said he tried to appeal to me on a..I'm black, your, black basis and he felt we should get along
- He said he travelled alot and hes always curious about people and places, he said he and Fitz travelled with the P.M. to different countries
- Fitz asked me for Rhonda? he said he felt Rhonda and him liked each other equally, but Rhonda was hesitant in that she felt commitments to the Peoples Temple.
- I told him of course she felt commitments to the P.T., but that wouldn't stop her from having a relationship if she wanted one, but that her husband had come into the country and they loved each other very much, at least when they greeted each other, I would have to say that they appeared to love each other alot.
- I told him we realize there are cultural differences, but in the U.S. normally if you say your married, men will say alright and move on, but in Guyana they say so what! and we don't know how to deal with that.
- Fitz said he appreciated me explaining cultural differences, but what was wrong with being married and loving or caring for someone else?
- I told him that I was not judgemental of that type of relationship, but what often happens unless theres an agreement between the two and equal agreement, one is going out and having a good time, while the other is staying home taking care of the house and children ect and it doesn't work out fare, but if people make a mutual agreement I wasn't judgmental, but I just happen to love my husband very much for eg. and didn't want to go out with anyone.

BB-32-2

- Rhonda was at the airport at the time.
- Davied seemed more relaxed and less hostile this time I spoke to him, previously, he was very hostile, while pretending to come on to me, strange combination? probably he was told that I had reported him for wanting to go to the U.S. and was trying to follow instructions to make it up, but with time, the daggers of hate are somewhat less centered around me, hopefully I will see less and less of him.
- I asked Fitz if he thought that Guyana would now receive loans or funds as a result of their trip to the different countries?
- He said yes, he thought they would.
- I told him maybe he could tell us sometime of his experiences
- He said o.k. sometime, but he had to run.
- they stayed a couple of hours and left.

BB-32-h-1

Wesley Curtain  
Raul Blackman  
w/ Mr & Mrs Moore  
Deb T.  
Terri Jones  
Tim Jones

Deborah Touchette  
May 1978

- Wesley Curtain's father writes for
- They came over to the house unexpectantly and I invited them upstairs because the Moores had gone out to dinner, but when we got upstairs They had come back and were sitting in the Living room
- shortly after introductions they started asked a lot of pointed questions
- Raul asked how long were you in Jonestown?
- Mrs. Moore began by telling them of the beauty she had seen there.
- You've got them well programmed, Debbie, Raul said to me.
- I don't know what you're talking about I said, I haven't programmed anybody, shes speaking from whatshè has expienced.
- she agreed that that she was speaking for herself
- I will h~~o~~ to admit that I came with alot of skepitism, Mrs Moore said, of course I am a mother hen by nature, I like to have my children under my wing, but Mr. Moore is always telling me that I have to let go of my children sometime, and what's important is there happiness.
- ~~one~~ of them asked if they were happy?
- she said yes, she would have to say that her daughters were ve~~ry~~ happy.
- Mrs Moore went through every step of the farm, discribing it in glowing terms, at times she had to shout to talk over the constatnt questions thrown at her by the two of them.
- at one point she got on her knees and came right up close to there faces so she could get her point in
- Mr. Moore also spoke of the happiness of ther children and said he had alot of respect for Cde. Jim Jones and what he is trying to do. he said although we don't always agree with every thing, what he is doing is along the line of the way we brought our children up.
- What don't you agree on? they asked ?
- Well, he said he felt Jim was too (OPTomistic..he used another word that had that meaning), and although the Luthern church in the U.S was more liberal then most churches, beings that P.T. is a different denomination, we wishop a little differently., but other then that we basically have the same beliefs.
- Wesley or Raul asked if people could travel into Georgetown whenever they wanted to, lets say they got tired and wanted to take a vacation
- I told him Yes with in reason, but that we knew when we came to Guyana the type of work and lifestyle we had to lead to develop a model community, and people can't just travel back and fourth all the time or production woudl go down
- Mr Moore spoke up and said they had to have some form of dicipline in that respect, that's why they've built the community that they have.
- after a series of cannon ball questions and raised voices Wesley said he appreciated speaking to the Moores, he hopped they didn't think the two of them were rude, but they just wanted to ask alot of questions because there was still an empty space or a blank

BB-32-4-2

spot in terms of the P.T.. They said they wanted to go up there some time and see for their selves what is going on.

-I told him I was suprised for the whole of the evening because I thought we had gotton past that stage in the development of our friendship and I was suprised to here him saying that.

-(Note this was just after Olga left, and Wesley came to our home several times in the day and night, as well as called to locate Debbie, he said she had tried to get in contact with him and his father answered the phone, it was in the middle of the night)

-Terri agreed, she said that I had introduced her to them as friends and we don't say that about people easily

-Wesley made a remark that Karen had said she didn't trust the press

-Mr Moore said that was understandable in that we had received so much bad treatment by the press, naturally we would be suspicious of the press.

-I told Raul that they both should come in to J/town some time and see first hand what's going on. That would eliviate some of the questions they are always asking and they would have a better understanding.

-Raul & Wesley said you people have done alot for the image of Peoples Temple in our minds.

-The next morning as we were saying good-bye to Mr & Mrs Moore, she turned to me and said, you know, I'm glad those two young men came by last night. They helppe me realize how much I needed to come to Guyana.

-I thinkw convinced them don't you?

-I told her I did, at least I hopped we did.

-during the course of the conversation the previous evening, she told both of them, that if they go, it shouldn't just be for one day, it should be for a week'end at least. She said it took one whole day just to see the piggery.....

-Tim suggested that since they were always looking for a story, this would make a good story and

-Wesley said this was the type of thing we should do on our radio program, it would help our image immensley.

-Mrs moors s said I can just see you will be quoted as saying something and it will be taken out of context (to Mr Moore)

-I forgot to mention that Mr. Moore had said that he felt our co-operative could be a model for the third world, and that perhaps the Marxist Lennist theory could work for third world countries....

BB-32-1-3

Jean M. Singh  
w/Marceline, Sharon, Deb T.

July 1, 1978  
Deborah Touchette

- We met her the night Mrs Burnham was speaking on the street in Prashud Nagar, when she was saying things this little woman who is about the size of Sharon Amose and has the same personality, would yell out things in agreement of what was being said by the speaker, both Cde. Burnham and Cde. Corbin; after the meeting we introduced ourselves and said we would like to talk to her about the project, she said she would be happy to talk to us so...
- she said she and her husband were both very active in the party often they would not get home until after 12:00 or two a.m. in the morning she said she liked to cook and clean house, but she never had time to anymore.
- Marceline told her about the woman who had visited our project, woman who was formerly a headmistress,
- Sharon told her about the harassment Peoples Temple was receiving in the press, told about black elected officials..
- Marceline told her about adopting children of all races, and not really knowing what oppression was until she adopted a black child.
- Jean agreed that the racism was really what was dividing our nation
- she felt if Jagan and Burnham could ever get together, then the racism would come to an end., and there would be solidarity politically
- she noted in most nations there is one party then there is the opposition which is really opposit, but in Guyana the opposition is of the same mind, but with a different approach
- she told us a little history of how the africans were brought over first and made to be slaves, but when the africans started to revolt against slavery, they brought over East Indians and would not let them work in the same areas so that the Africans could not tell the East Indians how they were being exploited.
- they set up boundry lines so that there would be no communication and so the East Indians never knew what was going on with the blacks and this is when the racism really begin, and they have , the exploiters worked at keeping people separte for as long as they rulled,-
- then when Jagan split with Burnham, he started using the racism to get the votes and even today in the more rural areas, she and others will talk to people and they will say they know what Burnham is doing is right, or that racism is wrong and when somebody from the opposition comes and talks to them again, then they are won over to the other side because they play on the racism.
- She told us of a program they are now doing with the children
- they are having classes to teach the children the basic things about their country and what is happening politically in the country now
- she noted the things written on the black board in some pictures that Sharon showed her of the school in Jonestown about the PNC and the PPP, she thought it was good that we teach our children what each of them stands for, what the flag means ect, they should know this at a young age because, -she agreed with Marceline that the children of today are the future of tomorrow
- she said they are setting this program up in the schools, but not as extensively as they are in the PNC office, because people get offended, especially if the child's parents belong to the opposition they might not learn the words to the party ballit song, or the more detailed things about the PNC itself, but they will all learn the basics about both parties
- Shron told her more detail about the press attacking P.T. and basically as a socialist group in the U.S. we faced alot of attack

BB-32-4-4



- I told her about the attempts on your life and childrens life
- we told her how they attack the charcters of people like Dr, Martin Luther King.
- She was upset by the attacks of P.T. and moned or showed signs of deep hurt when I told her about the assinationa attempts.
- before we left, she told us if she herd anyone talking bad about the P.T., she would defend us. and she would like to come up and see Jonestown, although it would not be until after the referendum.

q

BB-32-1-5

June 2, 1978

FOLLOW\_UP INFORMATION FROM P.R. THINGS TO DO RADIO

- 1) Press- Guyana Chronicle said they need the exact date of the article and the name of the article eg. editorial and the name of the paper, Citizen or Chronicle? so if they print a story on the petition, they can make ref. to the article.

Clarence Curtain said he would do a favorable story on P.T., he didn't say what date it would be released, and he wouldn't promise that it would be printed. He said all he could do was send it in.

I think we should do something about Hamulidin's situation, or he may be reluctant to give us information or articles in the future and we would be cutting off our nose despite our face.

- 2) We visited John Clarke who just got out of the hosp. and took him a gift on behalf of Cde. Jones, he introduced us to Mrs. Baird, former Min. of Education, now the advisor to the Min. of Education she was favorable to P.T. said Baird wanted to work something out for P.T. but was feeling pressure from a lot of doctors. She wants to come up and spend a few days on the project in the next mo. or two., said she would get in touch

The Russian Embassy is still waiting on that information about Stanley so they can inquire, they said they won't do it otherwise because it would be returned for further information on the matter

Min. Kennard- Mike and Deb went to see him today by appt. when we arrived, his sec. told us he had cancelled the appt. for official business on govt. level and would set it for another time, she would call us. We inquired about the sea shell permit (Mike has been working on this for a week) The secretary is doing the follow-up on this but hasn't gotten anywhere yet, said she would call us.

V.H. has been to visit a couple of times and said he would show us one of his mines before he leaves the country which will be soon (going to Europe) said he would come around this week. Said all we would have to do is see how it is set up and we would be in business there is gold up that way,

Cde. Denny TUC rep. is coming over tonight to talk about the Cultural show, which he predicts will be in sept.

Were having a film tonight by Min. of Information and a few people are coming to the house;

BB-32-4-6

Wills- he is still out of town

Alex- We took him a gift, he and his wife were quite friendly, his wife said all the women at the USSR Embassy were asking her what it was like there, and are wanting to go. They say they wish it was them instead of her that went. They showed us a lot of pictures of their home town and gave us some of them.

- 3) What should be done about the naturalization papers? the police officer from Brickdam asked me when I was bringing in the Passports? what should I say?

Lynetta's death certificate has not been processed yet. Fingle said he is trying to work out a way to process them without sending them to the North West to be signed and then to come back to town. He told Anita that he expected to be through with the papers by next Tuesday.

Derrick works with-(ref. to the question, find out who Derrick works for?) Financial Times in London  
Gemeni in London  
Cana & Rueturs in Barbados

Julia's resvp. are made for the 25th of June (confirmed) through Kingston, she doesn't have to overnight in Kingston. (Julia & Kimo).

Min. Mingo said the License for marriage was being held up at the Reg. General's office, I spoke to the Reg. general yesterday and he said he would work on it and to see him again on Monday June 6.

We have an appt. to see Lynetta Dolphin tomorrow at 10AM, Min. Mingo said she spoke highly of our performance at the Cultural center, (she is the Director of Culture)

WRSM is having a convention this week-end

- a Friday June 2, Annual Conference will be at National Hall, Cde. Viola Burnham-speaker.
- b Friday night is the dance
- c Sat Morn. a meeting at the Regional Office
- d Sun. there was mention of a march?

we were told we would get the details on Friday.

Mrs Barbara McKenzie-Welfare Officer of the National Serv. said she wants to come to Jonestown in the next few days and give her service for about two weeks (voluntary)

~~Maureen Smith~~

BB-32-1-7

-3-

Maureen Smith  
Paula Europe  
Trevor Nero  
Michael Elias or Denise Hall (not sure which will come)  
are doing exams at the University of Guyana and want  
to come visit our project. They are all from the  
Natural Science Faculty. They wanted to know the cost  
were interested in coming the second week of July.  
(the voice sounded american) the woman gave her phone  
#, but seemed reluctant to give her address, although  
she finally did 62580.....11 Charles St., Charlestown, G.T.

borah Touchette  
ly 12, 78

want to be sure  
who has attacks  
illed alylnitrate

ng, cant go

to her  
asked that

BB-32-4-8

Lynetta Dolphin  
w/Mike P., Deb T., Sandy J.,

Deborah Touchette  
July 12, 78

- I think this was mentioned before, but I just want to be sure it reached Larry.
- Lynetta Dolphin was concerned about her sister who has attacks said she has Angina, and she takes something called alylnitrate which cannot be gotten in the country.
- when she has these attacks she cant lift anything, cant go up stairs, or put her hands over her head
- she has had this problem for four years
- she had hoped that Larry could be of some help to her
- she wanted to make contact with him somehow and asked that we give this information to him.

BB-32-4-9

WANT TO COME TO JONESTOWN

- (works for Office of General Sect. PNC) lives 353 E. Ruinveldt  
Joan Bamfield (work: 64644) No Home Phone
- heard the broadcast and got interested
  - worked at the Ministry of National Devt. under Dr. Reid in the accounts Dept.
  - likes Dr. Reid because he sets a good example of work for the workers
  - he has them go once a week to work in the fields
  - does yoga for the exercise, not the mental yoga
  - is a Roman Catholic
  - studies business in a private class
  - we told her about staying at the Kaituma guest house and she said she wants to stay right on the site/ we told her we haven't a guest house yet but would let her know when we do.
  - just doesn't want to stay by herself in the Kaituma guest house

Tussie (Wills friend) - he used to help Wills when Wills was sick

- he wants to come up/ first asked if we could sponsor him (meaning, I think that he wanted us to pay his way)
- I said he could take the plane up as we have no transportation except a boat which is kind of rough on the sea
- he told him he would need to arrange for a landrover when he gets to Mathews Ridge/ he said he thinks he can get the Minister's car (Carmichael)
- told him about Jonestown and he seemed very impressed

Wesley Benjamin

St Peters AME Church 52020 or 68907

- want 6 young people to come up on a weekend
- told him about staying in the Kaituma Guest house / they wanted to come Sept 8 but I told them WRSM were already coming on that date and the guest house might be too crowded so he said any other weekend would do
- wants to spend 4 days there

BB-32-i

(this is the man that came over and wanted to talk to us/  
I don't have his 'st name)

4 May, 1978

Fabian F (Debbie T, Debbie B, Sharon, Terri)  
Jimmy J

- he is very pro-American/ would go there in a minute if he was assigned to work there/ likes the girls there
- is very concerned about meeting young girls/ is 25 yrs old/ wants to marry by age 27
- is not "Guyanese" oriented in his personality/ a real go-getter, says he tends to be prompt - talks with great animation
- very egotistical/ if he came to investigate us, his approach is interesting as he talked about himself the whole time until the very end when we spoke to him about J's character, his family, the adoption of his children etc.
- he works for Radio Antilles/ gives the "hard" news about Guyana, gives reading of things from the Mirror as well as the govt. papers and then his own view, takes a govt. line
- is PR for Peoples Militia and for GDF / had to ask Col Martindale if he could come because you generally have to get permission from the military before going anywhere tho being in PR, he has more leeway generally
- he is also with the Ministry of Information, also in advisory capacity or PR
- he is very direct about his contacts, such as saying his best friend is the second secretary Ken Barnett of the American Embassy and he is a friend of Dick McCoy, in fact he said he met Dick before John Blacken and he say him recently but didn't talk about us, he said. He said that Dick and he have a drinking arrangement next week *to go to U.S. for Barack's daughter's wedding in July*
- he knows Timofeyev and said Timofeyev has invited him to come to Russia but he wouldn't go because he doesn't like Russia, the lack of freedom and only if they paid his way would he go
- he said he saw Timofeyev's son playing freely and he said to him "in Bulgaria your son wouldn't be able to do so" and Timofeyev agreed, he said (he doesn't even know we know Timofeyev, at least we didn't say so)
- I thought the best thing with him is not to give any opinions on anything but just draw him out/ asked him what he thought of various countries
- he said that US has a lot of freedom and great girls
- he likes Cuba tho he said there are guards that watch you like if you are with a Cuban girl, security will watch you and ~~xxxxxx~~ he doesn't like that/ he said the Cuban girls are very "approachable", in fact they approach you which he likes
- he said the Cuban people seem quite sincere and he likes that ~~xx~~ and he likes Havana, said it's beautiful and he was well treated there, in the best hotels tho he said there are paupers there and he was taken on "guided" tours
- he used to work as a GBS producer (not a broadcaster) - had a show which involved telling about various groups and what they were doing
- he said there aren't many journalists in Guyana, he said that Hotten Archer, Cde. Forsythe, Josiah someone, were some that were real journalists
- he said that Hamalidan is not that good, is overrated, he is a hypocrit in that if people criticize his work, he blames it on the editors but he said the editors don't touch Hamalidan's work
- he says Yugoŕlavia has a planned economy, and is the only socialist country that has a planned economy and it doesn't give enough flexibility
- he said the non-aligned movement is a farce, that every country is aligned
- he doesn't like China and No. Korea as the people are brain-washed. *Is going to Sweden because he likes the girls*
- he plans on being a diplomat eventually/ would like to be PM
- reads a lot about international relations and philosophy/ doesn't like history that much - *wants to go back to U.S. to get his master's in International Relations*
- plans on coming to visit Jonestown, not next Sunday, but the Sunday after, says he has friends who are pilots who could take him there
- is not a PNC member but Debbie mentioned that we are, said the meetings are too boring
- is Roman Catholic but doesn't go to church because his priest is a hypocrit/ says he saw his priest in a discoteque with a girl and he told him he was a hypocrit but believes in God and when one man said in a discussion that man came from the apes, Fabian said "I don't understand this, I thought God created Adam and Eve" and that stopped the discussion. The man was also discussing "society" and Fabian said "what do you mean by society" and the man couldn't really define it and Fabian gets an enjoyment out of exposing people like that when they can't respond to his words
- he said that you can find few young people that can carry a discussion and he was interested in talking to us/ said when he goes out socially with his friends he has experimented and if he shuts up for a couple of minutes, all discussion stops/ when I asked why that was, he said "environment" he guessed
- I complimented him on being so analytical and intelligent and ambitious/ he doesn't answer to compliments but seemed to really enjoy them
- he likes to drink/ would have had several beers at the Pegasus but the place was on strike
- says people tend to treat him like a son/ ~~xx~~ like when he first got out of school, he worked for Carl Blackmon who treated ~~it~~ him like a son (confided in him) but he said "I don't eat like a son tho"
- he goes to a lot of social events he said, but doesn't like them because there are mostly big wigs there and not enough "young girls"/ he'll make an appearance and then disappear before anyone knows he's gone
- once he was saying goodbye to the PM who was going to Kimbia and then he arrived in Kimbia - before the PM in time to greet the PM and the PM made

BB-32-j

a comment on Fabian really getting around  
-he said one commentator on GBS, Carlton someone is really fine/ he was trained in sociology but he a great commentator and really "does his homework" - he does 12:00 news  
-I asked him about Carl Greenwich/ he said Carl is a good friend of his but said Carl isn't that great as a commentator and then said he wouldn't say more as Carl was his friend  
-he said ~~that~~ that he himself really has to do research when he is doing a subject and once he didn't do his homework when he was talking about someone who was in town and he put a bunch of words together and turned them around and they didn't say much but he really got criticized for it  
-he knows promptness because when you do broadcasts if a commercial is a second or so off, the business won't pay for it  
-he asked if we knew Diane Morresy (her husband works for the American Embassy and she works for GBS) - she's the blond woman, white that Terry B. noticed when we were doing a broadcast for GBS / and he asked if we knew Flossy someone at ~~the~~ USAID or US IS (I said no to both of them tho I said I had seen Diane at GBS)  
-when he makes broadcasts for Radio Antilles, he does them at GBS and then sends them/ said the govt. doesn't mind his reading the clips from the Mirror  
-said he talked to the British High Commissioner recently and commended him on his English, said he usually can understand Americans tho better than British people. Or even Russians who he thinks speak better English than the British  
-said the British High Commissioner was 10 minutes late for their appt/ said he told the man he was becoming Guyanese and adapting himself to "Guyanese time" the man laughed and agreed  
-we told him of the adoption of J's children, how each was a child that wouldn't have survived, or would like Jimmy have been retarded because of lack of care, or like Agnes would have been untrained and have no caring for by her prostitute mother and what JJ and Marcie did for her so she is a nurse etc., and the adoption of Lew, Suzanne and Stephanie  
-and Marcie's work in California, investigator of all nursing facilities and how they put in all they had, JJ working as a teacher even the sons working, and ~~some~~ some of us living cooperatively and ~~the~~ saving money which now goes for equipment etc. - how JJ spares nothing to get medical care for people, the adoption of J Warren and Kim Yoon Ai because of his example and the many surgeries  
-~~he~~ told him about relatives visiting now, the Moores, Davis  
-the reaction of John Blacken and Tuminia to the care of the seniors when they visited  
-we gave him a booklet (Model Community)  
-he listened intently to J's adoption of children and how JJ and Marcie believed and were an example in their family of all races living in harmony/ of people of all backgrounds being able to get along  
-I told him about J's character, how he was a millionaire and put it all into the ~~the~~ PT, how he was offered several million by the church because they weren't living up to his example and his work for civil rights had ~~been~~ involved ~~in~~ some trials/ and how he refused to take the peoples money  
-then his ride came and he left/ said he wanted to visit  
-wondered if we were married / we said some were and some weren't but didn't specify who was or wasn't/ he said he had his views on marriage and then said he was looking for a girl and wanted to marry at 27  
-he knew Carl Blackmon's daughter was marrying Kirton's son and said he would be going to the wedding too/ we told him our band was going to play and we had been invited to play with headliner bands and also at the cultural center/ he looked impressed  
-he was surprised we had played at the Pegasus/ said he was there but was just involved dancing so didn't ~~know~~ notice the ~~band~~ band  
-said he wanted to visit some African countries soon, wants to visit EDIE Amin's country tho doesn't want to be killed  
-doesn't know much about Tanzania  
-doesn't like England that much/ was there for his education

BB-32-J-1



Roosevelt Daniel 4May 1978 (he gave us a ride today, Debbie, Terrie, Debbie, Sharon)

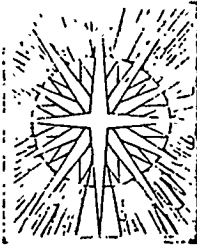
- he teaches at University of Guyana, is from Sri Lanka (formerly Ceylon) - is Anglican / his family has been Christian for 4 generations
- we invited him home for a beer so we got a ride all the way here from where we went to see skip Roberts
- he is kind of shy, friendly but not pushy/ said he'd like to come visit/ takes his class on field trips/ he teaches geography but it is mostly land geography so they study soil conditions etc and they recently spend 2 weeks in Ripayuni and slept in sleeping bags in the school there/ flew in
- he says Indira Guandi and most of the Indian leaders try to help the poor people in India/ said that a more conservative leader is now ruling who is not as close to the Soviet Union as Indira was
- signed a 3 year contract at Univ. of Guyana and has been here 2 years/ after 3 years he doesn't know where he'll go or what
- his wife ~~ix~~ was a teacher in India/ prepared students for University/ has 2 children 2 and 8? or 2 and 10
- we told him we were a religious group/ believed in serving God by serving mankind (highest worship etc)
- he had heard the mention of us but not too much/ ~~wexdani~~ showed him pictures of the project
- he didn't know the Da Costas
- generally was nice, he doesn't tend to be very political he says
- kind of easy going

BB-32-j-2

(they said we ought to lecture at service clubs, and parti, late in the Youth Activities  
May 22-29 so people can know more about us)  
NEWSPEOPLE visited two times (around the 20th or so of March, 1978)

- it was a hectic night that night x in fact both nights they dropped by it was hectic/ the first night Vincent Hines was visiting and one group were talking to him so we had to take them in the other part of the room
- the second night, Jonestown was on alert, we were supposed to make contact with Walter Rodney plus some of go to a lecture about USSR and someone was supposed to come for dinner Fitz the PM's guard and he was here at the same time:
- they asked a lot of questions and so the young people on both nights and others who were talking to them called for me because they didn't know how to deal with them. I made a joke ~~of~~ out of some of the things they said (like JJ has told us to do) and that strategy of J's seemed to work the best as they stopped the probing
- another thing I did was to ask them questions, another thing JJ has advised and it was really funny, they got into a big argument about what socialism was and what they thought about it and we all calmly watched them without getting involved and when they left they apologized for being so talkative and not letting us talk, and we graciously thanked them for being so willing to speak up and said we enjoyed what they had to say
- the thing I made a joke of was they asked if we would marry people outside our group, and I said of course we would, "Who wants to marry us, we'll start interviewing them." He kept asking about this making various situations up, such as if someone wanted to marry one of us and yet didn't want to live with us, could one of us marry them and still live with us and go visit the one they married. I laughed a lot and said "it sure sounds complicated, and the situation hasn't arisen but I'm sure we could work something out." I said "who are all these people who want to marry us. I didn't know we were so sought after." It ~~was~~ got so ridiculous that ~~he~~ they started ~~laughing~~ laughing too. When they said the situation about one living in and one living out, I said, "you are sure making it complicated." Then he said he'd like us to give a talk at his work to ~~the~~ the people he works with (he works in a Liguor company doing a newspaper for them as well as being a writer that submits to newspapers). I said we would be glad to. He said, "now of course I don't want you getting any of the people I work with to come and stay in Jonestown. I seized on this "Oh, I thought you wanted to have people outside marry us and here you are the one that is holding out on us, and we are all ready to marry you people." We all started to laugh and he started to hem and haw and say, "well it isn't that, we just need the people to be in the company"
- he said the problem of marriage had come up with the National Service or some group where they had to live together in barracks and they didn't quite know at first how to work it out, if the people wanted to ~~xxxxx~~ marry
- he said we were controversial and he ~~was~~ (they) wondered why ~~was~~ there were so many rumors they had heard about us. I told him that every avant garde movement had controversy and explained that ~~x~~ even the mental health movement in the US (which is now very widely accepted) was considered very radical when they tried to stop having people imprisoned for mental illness). I mentioned that this had happened thru history, those that made changes or stood for principle, whether widely known or not, were not ~~xxx~~ accepted at first, even tho in the end they might be the ~~x~~originators of widely accepted ideas or practice. I said however that we had support from ~~xxxxxxx~~ all the progressives in the US, ~~xxx~~ that it was only reactionaries that didnt like our stand on Nazism that gave us problems, and that here we had the wide support ~~xxx~~ and kind ~~of~~ help from governmental leaders and we were very grateful ~~f~~ to everyone who had helped us here. That people were generally very kind and friendly to us and that even when people at first had questions, like a couple of ministers, when they visited our project and saw for themselves what we were doing, they always were very supportive and even called us a model community. We said we certainly aren't trying to be a mystery (as he said some thought of us that way), and that's why we had open houses, why we invited people to our project, to look at every inch of it etc.). He said that they had come to the open house expecting us to be mysterious and ~~wid~~ wierd and instead found a sense of brotherhood and warmth, Guyanese and us mixing very warmly. I said (again joking a little) that We sure were sorry to disappoint them about the mystery but as ~~was~~ he could see we are a very open and direct people, and just ~~xxx~~ like

BB-32-K



# PEOPLES TEMPLE

OF THE  
DISCIPLES OF CHRIST

Jim Jones,  
Pastor

November 19, 1977

"For I was an hungered  
and ye gave me meat:  
I was thirsty  
and ye gave me drink;  
I was a stranger  
and ye took me in;  
Naked, and ye clothed me;  
I was sick and ye visited me;  
I was in prison,  
and ye came unto me.

"Then shall the righteous  
Answer him, saying,

When saw we thee an hungered  
And fed thee?  
Or thirsty,  
And gave thee drink?

When saw we thee a stranger  
And took thee in?  
Or naked, and clothed thee?

Or when saw we thee sick?  
Or in prison,  
And came unto thee?

"Verily I say unto you,  
Inasmuch as ye have done it  
Unto one of the least of these...  
...Ye have done it unto me"

Matthew 25:35-40

DEAR FRIENDS:

The enclosed letter is sent to you from the stateside office of Peoples Temple Disciples of Christ and Bishop Jim Jones. Our church is, as you may already know, currently building a highly successful agricultural cooperative in Guyana's Northwest Region.

We have enclosed, for your information, an article written by our attorney, Charles Garry, about his first-hand impressions of the agricultural mission from his recent visit there. Mr. Garry is considered to be the greatest U.S. civil rights attorney and has helped a great number of especially black and minority defendants and political prisoners throughout his brilliant career. He was extremely impressed with everything he saw: with the country of Guyana, the many government leaders he met, and with the amazing progress of the Peoples Temple agricultural project under the direction of Bishop Jones.

Enclosed, also, is a statement by a highly trained social worker who has chosen to move to Guyana from the United States, Ms. Sharon Amos. Ms. Amos has three children in the Jonestown project and now resides there herself. As her report will show, she raves about the fullness and security of the cooperative lifestyle there.

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BB-32-1K-1

KIRTON AND BLACKMOND (7-1-55)

we were talking to them tonight in a relaxed manner, we try to be very communicable with people, and it's usually people that start rumors that really don't want to communicate and straighten things out, because every time there have been people that have misunderstandings about us we have tried to communicate on a one-to-one basis so they can ask questions and work it out. We said we have gone to every means to work it out, with our radio show answering questions people have asked us, the cultural show presenting our cooperative spirit etc.

-he said that we should have a meeting with the community, he called it a "symposium" and have Guyanese people ask us questions from the floor and answer them. I told him that we had been ~~adv~~ advised that this wouldn't be a good idea, ~~because~~ because the ones that spread the rumours aren't interested in objective answers (we have been told) and thus would just come to harass us and try to start fights which we don't want. We said it would be different if it was people that are objective and really want answers. I said that those who don't like us, ~~and they~~ we have been told are against an interracial group that is so successful where there is no racism, sexism, ageism and that kind of people you can't talk to.

-~~we~~ I said that we find you can really talk in more depth on a one-to-one basis and you have more time to explain things in depth that way and to have a real dialog

-he said (they said) they understood but they did bring up the same subject the next night they came by and I answered the same way. Then again stopped the questions and said they understood.

(I should have given this info first but I will now. The three that came were 17 year old Rawle Blackmon who works for the National Newspapers, the Citizen and the Chronicle, I asked him to bring samples of his articles which he did the second night. There was some sports coverage and a very nice article about a woman who is very active - I think if I recall she is teaching at the university and she is for women's liberation and he covered it, I told him, sympathetically in terms of indicating her goals for women and for herself. He also covered a speech of a politician, which he said he doesn't like to do as it gives ~~me~~ little room for creativity).

-I should xerox samples of his work and send it to you, will try to do this, I should have thought of it this evening.

-Rawle isn't that unsympathetic when talking to you. He doesn't probe as much as the other guy Wesley Kirton and he doesn't seem quite as sharp

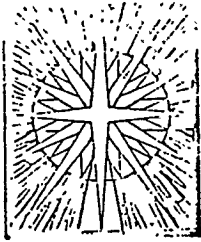
Wesley Kirton 20 years old works for the Guyana Liquor Corporation GLC/ it does processing and canning as well. He is the PRO (Public Relations Officer) He also freelances and submits to UPI (which his father works for) and Guyana newspapers. Both he and Rawle said they would for sure let us read first any article they would ~~write~~ write, altho Rawle said that journalists don't like to do this generally as it could hamper your style but considering the situation we have been thru they would do so

-Laurie Kirton 22 years also came, he's not in the press but is a graduate student of economics, works for the Small Industries Corp which helps small businesses (govt project) he was friendly and nice but had some trouble with his ~~so-called~~ brother Wesley who had a fierce thing going with Laurie (who is a man). Wesley confronted Laurie every time Laurie talked and made him (or tried to) make him look like a fool. ~~When~~ When I asked ~~what~~ what they thought of socialism (to feel them out), they had a ~~huge~~ huge argument and Wesley said that Capitalist countries actually help Guyana more than Socialist countries do (they didn't mention, nor did we, that Capitalist countries have ~~huge~~ ~~huge~~ huge strings attached to their help etc.), I asked Wesley what he thought of the Guyanese system and he said that there is a ~~difference~~ difference between a socialist ~~system~~ system and an underdeveloped country (which he is saying without going into detail) has difficulty being socialist because they don't have many resources in which to provide for the needs of the people etc.

--Wesley said he'd get us on night ride (to advertize our cultural program) -it would be free

-also he would get us on Radio Demarara with Pat Cameron who is a very good friend of his/ he calls her Aunt Pat and he wants to invite us over to talk to some friends

68-32-15-2



PEOPLES  
TEMPLE  
OF THE  
DISCIPLES OF CHRIST  
Jim Jones,  
Pastor

November 19, 1977

"For I was an hungered  
and ye gave me meat:  
I was thirsty  
and ye gave me drink;

I was a stranger  
and ye took me in;  
Naked, and ye clothed me;  
I was sick, and ye visited me;  
I was in prison,  
and ye came unto me.

"Then shall the righteous  
Answer him, saying,

When saw we thee an hungered  
And fed thee?  
Or thirsty,

And gave thee drink?  
When saw we thee a stranger  
And took thee in?  
Or naked, and clothed thee  
Or when saw we thee sick?  
Or in prison,  
And came unto thee?

"Verily I say unto you,  
Inasmuch as ye have done it  
Unto one of the least of these...  
...Ye have done it unto me"

Matthew 25:35-40

DEAR FRIENDS:

The enclosed letter is sent to you from the stateside office of Peoples Temple Disciples of Christ and Bishop Jim Jones. Our church is, as you may already know, currently building a highly successful agricultural cooperative in Guyana's Northwest Region.

We have enclosed, for your information, an article written by our attorney, Charles Garry, about his first-hand impressions of the agricultural mission from his recent visit there. Mr. Garry is considered to be the greatest U.S. civil rights attorney and has helped a great number of especially black and minority defendants and political prisoners throughout his brilliant career. He was extremely impressed with everything he saw: with the country of Guyana, the many government leaders he met, and with the amazing progress of the Peoples Temple agricultural project under the direction of Bishop Jones.

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BB-32-K-3

KIRTON AND BLACKMOND PRESS PG 3

and she'd be there. He invite some of us there

-he Wesley said after the first time he visited , his other brother, not the one that was with him had an arguement with him and said "would you chuck your job to go and stay at PT Jonestown?" Wesley said he said "If I went up to Jonestown and liked what I saw" - his brother said he was crazy for wanting or thinking of chucking his job for anything

-Wesley was very nasty to his other, ?? so-called brother that came with him/ he'd interrupt him and ask him probing questions when the guy expressed an opinion/ later he said that they weren't even real brothers and said something about that in a disparaging way

BB-32-K-4



Conversation with Mauric Harrisson, owner/manager of Design & Graphics 13/4/78

\* I dont know exactly how we got on polttics, I believe we were talking about the black-outs and he was telling me how things were going downyill in the country. He said that the government wants people to increase production, and yet there were thousands of workers out of work because of the power failure. (For background: Harrisson is the official design and layout and ad man for the government, and has been for years. He is very well known around town, expelcially in party circles.)

-he mentioned that he had heard about the foreign exxchange scandal. He said it was 22:million dollars in US ~~off~~ foregin exchange ~~that~~ that had been stolen from the government. I asked him if he had heard any names. He said Hope, King, and Noel. King is the one who ~~is~~ is the most deeply involved (that is Frank Hope, Minister of Finance, Goerge King, Minister of Trade and Consumer Protection, and I dont know who Noel is.) This coincides exactly with something that Wills told us, which supported the original thing we had been told by Vincent Hines. Hines didnt give us any names, but Wills filled in the ~~dx~~ details.

-Harrisson get his information from someone high in the party. He said that sometimes people in the party know things that are going on that people in the government dont.

-when I asked him to tell me frankly how Shirley-Field-Rifley felt about Peoples Temple, (he has to work with her quite often, directly) he told me that she does not like people who are white, and if you are white and American "it's 200 times worse."

-he said that Hoyte is a "bitch" and is not very popular at all in the party. He said that he knew that several years ago Hoyte was very ancious to leave Guyana. ~~px~~

-He said that Burnham is worth 54 million dollars, he said most of which has been accrued since he has been in office. He said that he knew that Burnham hardly had money enough to pay for his car being repaired when he was not in office.

-he told of a story where he was in a meeting with Green, Burnham, and ~~a~~ some others and Hoyte came in and asked what he was doing there and siad he should leave. Harrisson said that he told Hoyte off in front of everybody. He said that he has done jobs for the PM and others ~~n~~ for years, and had sat in meetings, and he wasnt going to let "that bitches ass" do that to him

-Harrisson lked the show very much. He is very very positivie to the project, and loves our radio shows. He did not like Mike's speech, but other than that thought the show was great. He also didnt think we need any outside entertainment.

-he said that he thought the person who is maneuvering into position to be the next in line was Viola Burnham. He said that she is getting involved in eveyrthing, and if you compare herposition now to ~~k~~ what it was ~~tax~~ several years ago, ~~ad~~ she is much more powerful.

-he said Dr. Reid was the most commiteed person in the party ideologically. (several people have ~~mx~~ made this comment. It is a prevalent opinion, among pro and anti PNC people.)

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BB-32-K-6



SOME RECENT CONTACTS WE MAY NOT HAVE MENTIONED

-Colonel Martindale, head of the Peoples Militia, he talked quite friendly to me and Karen at the Mashramani Parade for quite awhile/ was going to try to come to our party but didn't make it/ has been to our project with Gaskin, very favorable/ says he has a friend that makes water wheels to make power and he'd find out if the man would be interested in giving us a sketch

Margaret Ackman: Parliamentary Govt. Chief Whip / very friendly we invited her for dinner along with Evonne Wiltshire a supervisor that works with her

Lucille Wright- Acting Deputy Mayor of Georgetown/ we met her at Father Ben Parrott's Catholic Church where Marcie spoke

Father Parrott came to our party, he was very curious about us but a bit slight bit threatened ~~xxxx~~ about where J's membership came from/ wondered how I particularly related to J's church when I was originally an atheist (I told him that JJ didn't take people from other churches, mostly had people coming who had attended no church before and needed a very practically serving, humanitarian religion/ he was both fascinated and a bit jealous, I think tho he was polite.

Ron ~~xxxx~~ Robinson, he's at Radio Demarara/ he did all the MC's for the Prime Minister's Birthday celebration/ he MC'd the flag raising ceremony where the PM was present and MC'd the Mashramani float parade / he said he heard great things about us, wants to come, / he's director of Christian Stewardship of the Anglican Diocese / he gave us his home phone number and said he was sorry he missed our party

Jennefer Small Radio Antillies, very friendly, said she met me before at wills' house/ seemed to be very happy at our party, the other woman with her said ~~xxx~~ she never had a better time - seemed very much at home, very uncritical/ really enjoyed our robot soul dancers (Davis Solomon and Jerry did a demonstration)

(I must say that for such short notice our party was rather fantastic/ it was like a discogeche, not a lot of dancing tho we had some, but after Diane got up to sing, we had a dance demonstration by the Cuban Choreographer (wh teaches for the govt. Dance school in Guyana - his original numbers were performed at the PM's flag raising ceremony - a dance ~~xxxx~~ called ~~xxxx~~ Revolution that was very powerful, and he danced at the PM's Birthday celebration/ he wants to ~~xxxxxx~~ come back and dance for us again, wants to see our project and wants to give suggestions for our children's dance program/ a student of us got up and danced/ we had a ~~xx~~ guitarist who accompanied them and he also accompanied Diane - he was an ass and was religious, ~~x~~ but he was black and friendly as well/ the only problem was that he brought in Jesus Christ but the Cuban didn't seem to notice thank goodness. We also had a young Guyanese man who was with the woman from Radio Antillies and he got up and sang too. The slides went over very well and there was spontaneous interest and questions. The Judge asked us about the project, what we're growing and how our day goes there/ but he was very fascinated with San Francisco and asked Marcie and me all about SF, the shopping there the wonderful sight-seeigg. Glenda Polite said he flirted with her and asked her out

-we had the PM's 3 guards (one of them might have been a driver and they stayed quite late)

-Reds PERReira came late and talked to Karen

-Carl Bakmon was there, he said something about having had to call us before unfortunately about bad press/ his daughter gave Bobby the 3rd degree lately when she went by his house. She's a nurse and knew him and ~~x~~ asked if PT people could marry outside of the group/ he said yes and she said, "WELL then marry me." (I think her father set her up to put him on the spot, I think he just laughed)

BB-32-10-7

US-6U YAMA

It is always to be a good attitude... project in the third world countries such as this... friends of the US... project. There is no racism in... away from the race element... economic problems that face the world today. We here all have job with the chance to each equally get a education, for medical care, for example... living on anyone it is... like the extended family concept... sexism or racism. In fact... (give name and title) he said that this was a communitiy with the... Marxist form of egalitarianism that had ever seen. He has been all over the world especially Africa... of the races that...

V. G. T. P. S.

many who... have also said... empty and aimless... youth and... behavior... ecology and... program... ecology and horizontal things...

... to the various... ... helpful... ... made... ... helped us to get... ...

BS-32-10-8

Harry Harewood of Radio Demarara was there/ he appeared to be very friendly and interested in the slides but he came with Carl Blackmon (we hadn't invited him)

BB-32-K-9

Man From England  
Pegasus Poolside/Deborah Touchette

May 1, 1978  
Deborah Touchette

- Jack Beam asked me to come and talk to some man that was cornering Loretta Cordell
- (I wanted someone else to come with me, but they were speaking with others)
- This man said he was from England and had come to Guyana in search of a job and to see his children,
- He said his wife was Guynese and they had separated nine months ago, he was on speaking terms with her parents, but not with her. He said he came to see his kids because he felt she might go off somewhere with them and he wouldn't ever see them again.
- He said he was interested in our project and wanted to know how long we have been in Guyana? What area we are located in? and our purpose for coming?
- I told him of the humanitarian service work and Jim Jones concern that two out of three babies go to bed hungry every day, and scientists say South America could be the food belt for the whole world. I also pointed out the Guyana is English speaking with fertile lands and we had hoped to be an example that by production in agriculture in Guyana, the people could be fed.
- He said he was glad to hear of a group of people doing something like this, said he had been in Guyana for nine months and was just tonight here living with us.
- He said he used to live in Guyana many years ago, he worked for ten years in the bauxite mines in Linden, he said he married a Guynese woman and had been married for ten years.
- presently he was staying in Georgetown and working as a teacher in one of the schools
- said his field was electronics and that his office was filthy, also his home was a mess because he was now a bachelor, said implied he didn't know how to clean (I felt he was laying a heavy hint that he wanted me to come and clean his home for him) said he didn't have anyone to fix his meals or anything.
- I told him he was going to have to clean up sometime because he couldn't always live in a mess.
- He said he was glad we were being an example because there was a lot of bureaucracy in Guyana, people were lazy,
- Wanted to know if we had any trouble with Customs..
- I said not really, we go through the same procedures that everyone else does, but there is a law that states agricultural equipment comes in duty free, and being that we are an agricultural project, this is helpful.
- He said yes it was for us, but he had a lot of trouble with 'customs', said he was trying to bring in some equipment to use, camera equipment. He said he might like to get together with us and do a film of our place, it wouldn't be anything professional, but something that others could see of our project.
- He mentioned that he was now trying to bring in a jeep and the government was giving him so much hell, asking him to pay a lot of duty, and he wasn't going to pay, he thought he deserved to have his car and that wasn't much to ask.
- I said there is a lot of bureaucracy in customs, but it's that way everywhere, I said I was told that it was just as difficult in the United States, although I don't know because I've not dealt with customs much.
- He said it was in no way the same as in Guyana.
- He asked me where he could contact me because he would like to talk more
- I asked him where I could contact him because more people would be able to give him a better perspective, people from different areas for the project.
- He gave me his name and address and asked for our phone and address, I told him it would be better if I contacted him because I wasn't in very often, he said the same applied to him, so he would like our address so he could contact us if I can't get in contact with him by phone. He said sometimes he doesn't get phone calls because the people who answer are too lazy to call him to the phone.
- I told him I would call on Tuesday and let him know when we would be able to have an appointment. (I had hoped to have radio contact by then)

BB-32-1

2) Monetary Information; Guyana Co-operative Bank; Visited by Sharon A. Tin Carr, Karen Layton, Richard Janero, & Deb. T. We spoke to the General Manager, he said, if Guyana devalues the exchange rate would change. At this point it is fixed. He said the Guyana dollar is not so stable. Sharon asked what securities were they're in Guyana? He said we could buy govt. securities. (ref. to bonds) & asked him about a fixed account, frozen at the exchange rate when the account was open. He said they had fixed accounts at 5.5 percent, but they were still effective by any devaluation. Sharon asked about purchasing an object outside of Guyana, registered outside of

BB-32-m

March 24, Deb Fassett

(3)

outside of Guyana, when the seller is Guyanese? He said, "In a case where a Guyanese would prefer to have funds abroad, we can do that, but Guyanese are not allowed to have accounts abroad unless it is declared, but the problem lies with him, it's not your responsibility. He said, "Bonds or a fixed income were securities in terms of Guyana money. Banks used to hold funds at the exchange rate in foreign currency in speculation of change, but that's not done anymore," he said. "Hardly any room for speculation, only 50,00 Guyana dollars are allowed to be sent out per year as a gift, he said. To walk out of the country (airport), you can carry only 15,00 Guyana dollars w/out special permission from the bank. He said we should see Mr. Padmore or Mr. Fraser in the exchange control dept. at the Bank of Guyana. He didn't think the IMF would alter situations much, and didn't think it would interfere with the exchange control rate, the funds would be kept in. Guyana has certain conditions they have to satisfy, (ref. to the IMF) redeployment, all of that was part of the conditions being laid down. They felt Guyana wasn't making practical use of the available skills. He said, "When a country devalues, they must be certain there will be an increase in production. Production is falling in sugar, bauxite, rice, we wouldn't benefit by a devaluation. One U.S. dollar gives 2.56 Gy dollar, one pound sterling you get 4.50 Gy. Should it devalue it would be 6. something per pound sterling and that would mean more dollars in circulation. But Guyana would prosper if there was a production increase. As it looks Guyana will not come out. He didn't see production increase. Tim pointed out that Jamaica was told to devalue, the IMF demanded it. He agreed that was true, said Jamaica's situation may be different than ours. He said, "They may be exporting more, showing tendencies for increase in production. Foreign investments is one of the conditions the IMF would require. He said he saw no outward indication the government would give up on their stand previously made. He would like to believe each country is treated separately.

Bank of Guyana; Visited by Richard Janero, Karen Layton, Deborah T. & Sharon Amos. Richard asked about setting up an external account? (he didn't see where we had one already) Mr. Fraser said, "Why don't you hold it in U.S. dollars? This is my advise. There's no regulation in speculation of devaluation in Guyana. Sharon asked what the regulations were on purchasing outside the country (ref. to the boat), although she didn't mention the boat. He asked us, "like a ship for an example? It has to be an investment and/or it has to be approved. A sale has to be done locally. If it's investment, say like the IMF... If buying outside the country, you have to get an import license to bring things in, probably pay duty from external acct. If it's a situation of funds in another country, the purchase is made and brought to Guyana. You still need an import license. If your buying from Guyana outside, it's ticklish. If the object is owned by a Guyanese and funds are made by the boat, the funds should be brought in. It's the law. It's a domestic purchase, he must be paid in Guyana currency. It's illegal for a Guyanese to hold an account outside the country. There may be one or two situations but it's unusual. We would have to check it out if the person said he had permission. He said investment of funds is a security measure. Treasury bills - a one year thing at 8%, it's almost the safest thing. Sharon asked where we should do this at. He said anyone of those commercial banks. You won't have to worry about not getting paid on that. He said if it's in U.S. dollars, you should get permission in order to receive it without any trouble when it matures, you won't have any trouble getting it in U.S. dollars, apply to Guyana Bank.

BB-32-m-1

(4)

Bank. Mortgages, there's investment in house buildings. 4 to 5%. they've been doing that for a long time, it's expanding there alright, check it out. They make Agricultural Loans. They can lend to farmers because no one can come back the next year and ask for it. Sharon asked if he thought there would be a devaluation in Guyana. He said he wouldn't know if devaluation would happen, it would be a secret. There would be some stipulation. It's devaluation is something always considered. That is something I can't answer.

BB-32-m-2

Skip Roberts  
w/Maria Katsaris &  
Deborah Touchette

Deborah Touchette  
July 12, 1978

-These are notes taken from his file, Marie said you already had these on file, but I typed it over anyway for cross ref.

- 1. That in 1974 Jones had put out an appeal for all un-registered weapons his people could acquire
2. That the weapons were subsequently taken to Guyana chartered a/c out of Miami
3. That funds in excess of \$200,000.00 & \$3000,000.00 were seen in cash in one members room
4. Those monies are normally shipped via mail c/o Paula Adams at the Mission in Guyana.
5. That Jones is an active supporter of both the Black Muslims and Black Panther organization
6. That Jones had considerable political power both in Mendocino and S.F. counties
7. That Jones was seen throwing tear gas into a demonstration in Guyana in 1975
8. That Jones would like to become a factor in the Guy Govt. or power structure
9. That he has upward of 27,000 acres in Guyana approximately 30 miles up river from Georgetown whereupon he has his Agricultural Mission

Investigative details.....SF23PRF80024(JJH)

On Feb 24, 1977 @ 7:30 P.M. SSA R.E.

Murtagh & this agent met w/ approximately 14 people who over the preceding 18 months had left the PT.C.C & its pastor J.W. Jones

Prior to this meeting on Feb. 5, 1977 I had met with an intermediary of theirs who had told a bizarre tale of the goings on within the church.

These allegations were checked with a Senior member of the Mendocino County Sherriffs Dept. who acceded to their probability and acknowledged that the people who had left the church had cause for concern over possible physical harm as a result of their leaving.

~~BB-32 A~~

BB-32 A