JEFF HAAS 1 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 8 9 SUPERIOR COURT FOR THE STATE OF CALIFORNIA IN THE CITY AND COUNTY OF SAN FRANCISCO 10 11 12 No. 719-147 In re the marriage of 13 DECLARATION OF GRACE STOEN Petitioner: GRACE LUCY STOEN 14 and 15 Respondent: TIMOTHY O. STOEN 16 I am informed and believe that my minor son, JOHN VICTOR 17 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' Temple Agricultural Mission in Guyana and that they will refuse 21 22 to return him to me or to bring him within the jurisdiction of I further believe that un-23 this court unless ordered to do so. 24 less this court acts, John will continue to be held in an atmosphere that is detrimental to his mental and emotional well " 25 26 being and that he will be permanently deprived of the loving

-1-

5 i. -

BO-31-2-68

and stable home I can provide for him.

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

I was given the position of bookkeeper and became intimately involved with the inner workings of the organization. I
was instructed to become a notary public in order to assist in
the deeding of large amounts of real property to the Temple by
its members.

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

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

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

The Peoples' Temple gradually took control of my life. The regulation and regimentation of our lives caused Respondent and myself to grow apart. Leaving the Temple seemed impossible.

Members were strongly discouraged from leaving. Any defection from the ranks was seen as a threat to the security of the organization. Rumors circulated about dire consequences which would befall defectors. Because of my intimate knowledge of the organization's financing, my departure would be viewed as especially threatening.

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

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

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

1

2

3

4

5 6

7

8

9

10

11

12

13

14

15

16

17

18

20

22 23

24 25

26

- 21

\* 19

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

I am now convinced that my only hope of becoming reunited with John is to have a private investigator serve Temple representatives with an order issued by this court directing the Temple to release John to the investigator and to my custody. I have retained Joseph Mazor of Mazor Investigations.

spectfully request that this court issue the following order: Pending further order of this court, Petitioner is granted

sole physical custody of John Victor Stoen, date of birth January 25, 1972, age 5.

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

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

Executed this // day of August, 1977 at San Francisco, California.

GRACE LUCY STOEN