JOHN DIETRICH STADEN VC-1-a

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

U-1-a-1

To whom it May Concern:

I, Timothy O. 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 1974. The legal mother of said minor is Grace ~~Lucy~~ Stoen. The purpose of this statement is (1) to show ~~that~~ why Grace Stoen is unfit to be awarded the custody of said minor should she ~~can~~ file a ~~divorce~~ custody or divorce action in a Guyana court, and (2) to show to the government of Guyana that she is a dangerous reactionary who has indicated she would work with the Central Intelligence Agency to ~~destabilize~~ "make things rough" for any socialist country.

In July 1976 Grace Stoen abandoned said minor and ran off with another man, ~~of light skin~~ of light skin, blond hair and light skin. She indicated to me and others before she left that she wanted said minor to live ~~in~~ under the pastoral care of Rev. James W. Jones in Jonestown, Northwest District, Guyana, South America. ~~She left the~~

The man Grace Stoen ran off with ~~Grace Stoen went to live with~~ is a reactionary racist who by word and deed is totally opposed to Socialism. Grace Stoen has herself become a reactionary racist who by word and deed is totally opposed to Socialism. ~~Prior to~~ After leaving, she ~~She has~~ indicated ~~that she would work for the C.I.A. to be~~ indicated to me that she ~~wanted~~ was 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~~ came 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.

U-1-a-2(a)

DEPARTMENT OF STATE

Washington, D.C. 20520

May 2, 1978

Mr. Ken Norton
802 Fell Street
San Francisco, California 94117

Dear Mr. Norton:

On behalf of President Carter, I want to thank you for your communication concerning the custody case of John Victor Stoen, which is currently in the courts in Guyana.

All the parties to this case are American citizens. The parents of the child are on one side and the People's Temple, a California religious organization that also operates in Guyana, on the other.

Our Ambassador and his staff in Guyana have taken an interest in the case, but have emphasized that the interest of the United States is confined to assuring that the matter is fairly and impartially adjudicated in the courts strictly on its merits and without outside interference from any quarter. Consistent with this position, the Embassy has avoided taking any sides in what is essentially a civil dispute between two groups of Americans. Nor has any pressure been brought by the Embassy on the Government of Guyana or its courts, which have yet to rule on the matter, in favor of one side or the other.

The inquiries made by the American Embassy on behalf of the child's parents were normal protective services that any American citizen abroad could expect to receive from his government. The inquiries were not attempts to interfere in the internal affairs of Guyana and, indeed, have not been interpreted as such.

While we in the Department of State sympathize very much with Mr. and Mrs. Stoen in their efforts to regain custody of their son, regrettably there is little we can

U-1-a-2(b)

do to be of assistance. Neither the Department of State nor the courts of the State of California have the authority to enforce a U.S. court decision concerning the custody of John Victor as long as he is physically located outside of the United States. Child custody orders issued in the United States are normally not accepted for enforcement in another country on the basis of comity. While any American custody decision might be given evidentiary weight in the Guyanese proceeding, by no means will it be binding on that court.

Since the initiation of the custody suit in Georgetown, the Department of State and our Embassy in Guyana have been in close contact with the Stoens and their attorneys, both American and Guyanese. The Embassy has attended all court proceedings, when permitted to attend, and has assisted the Stoens in gaining access to Guyanese Government officials. The Embassy has regularly had conversations with the opposing attorneys and has spoken with Mr. Jim Jones, the head of the People's Temple. As Mr. Jones is also an American citizen and entitled to the same rights and protection as Mr. and Mrs. Stoen, the Embassy has been careful to avoid prejudicing the outcome of the dispute. It is the Embassy's responsibility to seek to ensure that the judicial outcome of the dispute results from a fair and impartial determination of the merits of the case, and all of our efforts are so directed.

Sincerely,

Hodding Carter III

Hodding Carter III
Assistant Secretary
for Public Affairs and
Department Spokesman

Jean The hearing was held 3 different times and was continued. ...He did show up in court, he and Grace got legal custody yesterday.

S. Yes, that was predictable.

Jean It was, except that we thought that he had a little more loyalty. I don't know what his motives are. He has always said that he would help us and that would never be an issue.

S. Never get between a woman and her man. It's an old adage. They run one to another, on top of loyalties.

Jean Tim did testify on her behalf yesterday. Promptly yesterday afternoon delivered a letter saying he demanded custody of the child. Said we were to deliver the child by next Friday noon. (quotes the letter)

S. What jurisdiction did the court have over the real father at the time?

Jean We say none.

S. Well, that doesnt do you any good. What does the court say?

Jean That I don't know, and I wonder how I'd find out?

S. Well, what type of service was given on him? Did he have actual service of the hearing?

Jean Yes, he did. He was notified to be there.

S. Where was that service performed? Down south?

Jean I'm not sure whether or not they got one down there. We did get one here at the church.

S. And it was communicated to him?

Jean I'm unaware of that. I think it probably was.

S. So actual notice he had; the question of legal notice is another question. Its your understanding he had actual notice, so he knows about the hearing and the judge entered an order granting legal custody and the right to physical custody to both the natural mother and her husband. I take it the court entered an order to that effect.

Jean I presume. I haven't seen the papers. Noone that I know was there, at the actual hearing ~~xxxxxx~~

S. You weren't there to hear what happened?

Jean I could get the court papers though.

S. Yes, that would be wise. The court will be signing an order within a day or so. You should get a copy of the actual

U-1-a-3(b)

papers that were filed and whatever copy of an order that the judge granted.

Jean This is what I understood you to explain last time: if the court did serve notice there, he did get it or whatever, the court's jurisdiction does in fact extend?

S No, No, I said there was a specific question about that. It was a question of reciprocity between the southern state and the courts here in the US. If in fact the courts down there received notice of this and chose to give it full recognition, then the court down there could issue an order giving what they refer to as "full faith and recognition to the U.S. court order." The US court has no jurisdiction down there.

Jean In itself, it has none. It has to be honored by the court there, is that right?

S Thats right. They would have to apply to the government there and have a court order there which grants full faith and recognition to the US court order. Then they would issue an order in turn mandating that a certain thing be done.

Jean What my concern is, our relations are very good there. What we have been able to accomplish there, by now we have over 800 people there. We also have a very highly developed crop which is exactly what the country is interested in doing for self-sufficiency and a number of other reasons. That's I guess what we're holding on to at this point, and its pretty good. Course it's still a matter of tremendous concern. What my concern would be is, is there any way, when you previously talked to me, you told me about the kind of warrant that was out for Huey Newton, a fugitive thing

S The only instance in which that would occur, for example is that if in fact the US court here had undertaken some sort of criminal sanction, or ordered that the real father be present, and he didn't show up, and chose to move to have him held in contempt.

Jean Who could do that, what court could do that?

S The civil court could, by the sounds of it. At least we don't have any affirmative information that that's been done. That's why its important to get a look at the paper.

Jean You think it might have been done?

S No, it doesnt sound like it. It seems like something would have been said in the letter that you received if it had been.

Jean Could have issued contempt?

S Yes, for example in a divorce case where a decree of divorce has been entered, and an order has been entered by the court

S mandating that the father pay alimony and child support. If he doesn't pay the child support, the court can enter an order directing him to appear in front of the court. If he doesn't appear, they can issue a citation for contempt. Then issue a warrant, because contempt is criminal. The fact is, its a felony. Then it becomes, if the U.S. court issues a felony warrant, the question becomes totally political with a foreign country as to whether or not they will have an extradition.

Jean What would be the jump between the local civil proceeding and the US court issue

S Well, no, it would be a State court, a State civil court can issue an order of contempt and can in fact issue a subpoena in effect. And then it becomes specifically a political question as to whether or not the foregin state will recognize it. In the vast overwhelming majority of cases, they do not. Now if in fact it were a federal fugitive warrant, which there's no way that that would likely get translated into one of those, that's when you get the sort of Huey Newton situation.

Jean Now the third situation would be, I thought what you said, was if there was some kidnapping charge.

S O, that - if they intended to bring a totally separate action - for example now, as I understand it there has been a State court order entered granting legal custody to the mother and to her husband. That means she has legal custody and that also means that the natural father has no legal custody whatsoever. He is no longer recognized as having legal authority to have the child - has no legal authority to have the child. There was one other question that arose, you indicated to me that there was also a party down there with him who had legal guardianship of the child.

Jean Well, it was not entered in the court. So it's something that simply could be revoked.

S Oh, well then there isn't any.

Jean No

S Okay, what you have then, is the natural mother, and the legal father, who have custody of the child. Now no one else has the right to have legal custody of the child right now. So in fact if they could determine if someone had the child and a request had been made to that person to return the child and the child was defying the parents, then they would be in a standing to go before a US Attorney and file a complaint for kidnapping, that in fact there are people in custody of our child who have no right to the child and they are keeping it over and against our will and they have actual notice of our demand to have the child back.

U-1-a-3(d)

S It's no longer a legal custody fight because that's been resolved now. So now they are very close to getting into a position of having standing to possibly file a complaint for kidnapping. Now if in fact a kidnapping warrant were issued, then that would end up into the straight realm of a decision as to whether or not the southern state would in fact recognize a federal warrant for extradition purposes. NO That's a simple enough issue to find out, whether or not they have an extradition reciprocity treaty with the US. If they did, what would happen is that the warrant would be sent down there to the executive department of the foreign state and they would have to make a decision as to whether or not to execute on it.

Jean Who would it be sent to?

S It would be sent to, like the federal law enforcement agency.

Jean It wouldn't be necessarily the executive branch; it might be the highest magistrate, or something?

S Well it would probably be sent to the comparable agency of the U.S. Attorney - their attorney general would get it and it would be the national police force that would be asked to enforce it. That's if in fact such a step were taken. If in fact no warrant for kidnapping were issued, then you'd be dealing with a civil action and as far as I can tell, they may not have any jurisdiction over the natural father. They may not have gotten any type of legal service on him to mandate his appearance and he may not be subject to the jurisdiction of the court. So to the extent to which it remains on the civil level, my sense is that there would be likely to be very little relief that they could get. But now if in fact they chose to take the step into the criminal dimension, then it would devolve down to the question of whether or not the foreign state was going to enforce the warrant. Those are the two situations that you're looking at.

Jean I have another question, and this regards the thing I mentioned to you; we thought it might be appropriate to find some place for the child other than where he is.

S Yes, to the extent to which there has been no service on him, if there is no service on him and he is not under any type of court order relating to the child that they have jurisdiction over him on, he has perfect right to go wherever he wants to go to the extent to which he's the natural father, has the right to take the child where he chooses to. Now the other issue about there being some person who is a legal guardian, that seems to be pretty well mooted now.

Jean They did sign a number of documents, and they were notarized, but they've never been filed with the court.

S Well, to the extent to which there is a superceding court order now granting custody to the natural mother and her legal

U-1-a-3(e)

S husband, I would say that thats pretty much viciated (sp?)

Jean I'm sure it is. If they were to go out of the country, say it were not he, but another person, and he had no knowledge of where the child were going

S Well, that wouldn't be very credible. The says that can be thought of creatively to avoid legal implications of what you're doing are not very successful because they've been tried before, so if in fact he did have actual knowledge of where the child was going and was the one in charge of, the agent that had the child, he would be part of a conspiracy to commit kidnapping, and he'd still have the same problem with the federal warrant.

Jean What if he actually did not know?

S Well, if he did actually not know, then he'd still be, if he were responsible for directing an agent to take the child and go somewhere when he knew that the natural mother and legal father had legal custody of the child, and he was doing this to keep the child out of their custody, that is what kidnapping is all about.

NOT IP
O U.S.A.

Jean Okay, so there's no way around that

S It's very unlikely

Jean Okay, considering that that would be the case, if he went out, what about if he were to go out of the country through immigration (break in tape)

S If in fact there had been no warrant issued, clearly the extent to which the letter is the avenue along which they're attempting to pursue custody of this thing, the extent to which theres no federal warrant outstanding against him, and theres no, from what I can understand at least, jurisdiction that has been asserted over him, he has the right to go wherever he chooses with the child. But the question is, the thing really shakes down to a question of what country would not recognize a federal warrant. That's where the bottom line political question is. If he is the natural father of the child and has the requisite affection and things for the child, is dealing in good faith with having the child in his custody, especially in fact if there were papers signed by the natural mother authorizing the child to be with whoever this subguardian was down there, at least at initio

Jean But, papers signed by whom, at this point now?

S If they were signed by the natural mother.

Jean

U-1-a-3(g)

S father, as I understand it, had no legal status until just recently.

Jean So anything he did was not really

S It doesnt really have any impact.
Shaking the thing down, what itlooks like is that if the natural father and the former guardian, at least according to papers even though it might not have been filed in court, and the legal father now all consented to the child being in this southern country, it seems that that is perfectly proper for the child to be there. If in fact there are papers that have been just signed yesterday which establish legal custody in the natural mother and the legal father and they want to have the child some other place, way up in San Francisco, by Friday, that is for the first time a change in status. The status had been fairly well understood apparently by the mother by her designating the legal guardian to have the child down there; the natural father was there and the legal father knew the child was there and apparently particpated in bringing the child there; all the status of the child there in the southern country is perfectly appropriate up until yesterday. As a matter of fact, it will be perfectly appropriate as far as I can tell til this next Friday. The only question then will be what type of communication was made between San Francisco, and the San Francisco court, and the legal parents now, to the people down in the southern country to mandate the return of the child. That's a physical question of what type of notice has been served, what type of jurisdiction obtained. At first it's a factual question, very simply; and secondly, it's a legal question of
None what type of force and effect a court order from up here really has down there. Unless a court down there has somehow taken jurisdiction of the thing and issued a court order from that country, my guess would be that it has very little if any effect.

Jean Little effect unless they pick up on it.

S That's right. But does the court up here take any real jurisdiction over them down there

Jean And issue a warrant

S And issue a warrant, then it really wouldn't have any effect until such time as either the executive department down there or the judicial division undertakes to issue some type of order predicated upon the U.S. court order. My sense is that there's no force and effect to it, that would be my guess

Jean I think that's what we're feeling.

S of course, then the quesion would be, what additional steps

S and what the status was with respect to various countries and their extradition status with the US. Tell him that I asked you to call him. He'll know a firm.

Jean We do have a written statement from the legal father saying that the natural father is in fact the natural father. I don't know - even if that's a written document, signed andwritten in his own hand, that isn't going to put any conditions on it at this point, that wouldn't change the status?

S No. See, I've been going upon the assumption that there's not any factual question about the status of the natural father, there's an evidenciary question - what type of evidence do you have, and that's of assistance to the extent to which it's evidenciary in support of that thing. But the fact of the matter is that the natural status of either the mother or father is not totally controlling, as you've no doubt gathered by this time. The status of the court orders are what really control.

Jean I understand, that's pretty clearly explained. And of course, he refused to return the child.

S Then you've got to get down to some of the bottom lines here.

Jean From what I've heard so far, what it really comes down to is one of the most troublesome aspects of law, when you have a natural mother and natural father who had initially entered into at least some sort of tacit understanding that they were going to spend their life together and raise a child, and when that understanding is breached, at the outset of the thing - clearly a natural father has as much right to custody of the child as the natural mother, and so its a straight 50/50 proposition. At that point, the physical possesion of the child is controlling. Who has the child. Then neither party can invoke thepower of a court to force the other person to release custody of the child to them, unless they can get the court to make a full ruling and say who has custody of the child. They can't without depriving one of the parties of custody ~~fa~~ physically remove the child. They can physically remove the child and they're perfectly legal in doing so - that's that whole kidnap situation. A parent cannot be said to kidnap their own child as long as they have legal equal access to the child. But now once one of the natural parents goes before a court and gets acourt order removing legal custody from one of the two parents and placing it in the other one, then physical possession of the child no longer controls. Then it's the court.

Jean Then it's your feeling that it's going to be a matter of political level, and the location of the parties concerned would be best determined at this point by the relations

S of the country at stake. You have to get yourself into the

S Well I would assume that they would just let it sit there pending, and my sense is that the worst that could happen is he could be put in jail for civil contempt with no term. Just in perpetuity until he complied. That's the worst that could happen, cause that could technically be longer than the sentence for kidnapping. Meanwhile, once the kidnapping charge had been initially filed, the statute of limitations would have run on tht and they could just leave the thing pending until the civil court was done doing whatever they were going to do with him. Then prosecute him. But that's stating things in the most nightmarish

Jean Well that's the way we have to think, so your advice is much appreciated.

S The real bottom line is the politcal reality between the place where he is and the United States.

Jean And as far as going somewhere else, it would simply at this point be a matter, even if he siad he didnt know, it's not really going to help the situation

S If the factstate that they technically have not established jurisdiction over here, there's no service that has been performed on him to bring him under the jurisdiction of the court, and I think we'd know that if it had happened, then he is free to go wherever he chooses to go. But given the kind of life he leads and the responsibility he has for his people, it's not likely hes going to go

Jean No, he's not going to go anywhere. I was thinking of someone else with the child, not he.

S What they'll do, is they'll move directly on him. Say I know you know where the kid is.

Jean And still they could act against him even though he could say he didn't know.

S Yes.

JOHN VICTOR STOEN
BIRTH CERTIFICATE

U-1-b

BIRTH CERTIFICATE

VC-1-b-1(a)

1. JOHN VICTOR STOEN
2. BORN JANUARY 25, 1972
3. MOTHER: GRACE LUCY (GRECH) STOEN
   FATHER: TIMOTHY OLIVER STOEN
4. BORN IN SANTA ROSA, CALIFORNIA

U-1-b-1(b)

CERTIFICATE OF LIVE BIRTH

STATE BIRTH 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 TRIPLET: SINGLE
3B. IF TWIN OR TRIPLET, THIS CHILD BORN 1ST, 2ND, 3RD?: ———
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 CORPORATE 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, CALI
8. AGE OF MOTHER (AT TIME OF THIS BIRTH): 21 YEARS
9. COLOR OR RACE OF MOTHER: CAUCASIAN
10A. RESIDENCE OF MOTHER—STREET ADDRESS (STREET AND NUMBER, RURAL ADDRESS, OR LOCATION): 6300 EASTSIDE CALPELLA ROAD NO
10B. INSIDE CITY CORPORATE LIMITS (SPECIFY YES OR NO):
10C. RESIDENCE OF MOTHER—CITY OR TOWN: UKIAH
10D. RESIDENCE OF MOTHER—COUNTY: MENDOCINO
10E. RESIDENCE OF MOTHER—STATE: CALIFORNIA 95482

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 THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

16A. PARENT OR OTHER INFORMANT—SIGNATURE (IF OTHER THAN PARENT, SPECIFY): Grace Lucy Stoen
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. PHYSICIAN (OR OTHER PERSON WHO ATTENDED THIS BIRTH) SIGNATURE—DEGREE OR TITLE: [illegible] MD
17B. DATE SIGNED BY PHYSICIAN OR OTHER ATTENDANT: 1-26-72
17C. ADDRESS: Santa Rosa, Ca
17D. PHYSICIAN'S CALIFORNIA LICENSE NUMBER: A14087

LOCAL REGISTRAR

18. REQUEST OMISSION FROM SOLICITATION LISTS:
19. LOCAL REGISTRAR—SIGNATURE: Walter C. Owens MD
20. DATE ACCEPTED FOR REGISTRATION BY LOCAL REGISTRAR: 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. Owens MD

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

U-1-b-1(c)

TE OF CALIFORNIA
ARTMENT OF HEALTH

OFFICE OF
STATE REGISTRAR
VITAL STATISTICS

s is to certify that
s is a true copy of
document filed in
s office.

ss validated on the co-
e, this certified copy is
ed without charge under
ority of Section 10430.5
he Health and Safety Code
for limited use under
rity of Section 6107 of
Government Code.

LIAM MAYER, M.D., DIRECTOR
E DEPARTMENT OF HEALTH
REGISTRAR OF VITAL STATISTICS

Roger E. Smith

ER F. SMITH, ACTING CHIEF
TAL STATISTICS SECTION

ANUARY 22, 1975

CERTIFICATE OF LIVE BIRTH

STATE OF CALIFORNIA—DEPARTMENT OF PUBLIC HEALTH

STATE BIRTH CERTIFICATE NUMBER: 104-72-015416

LOCAL REGISTRATION DISTRICT AND CERTIFICATE NUMBER: 4900-170

THIS CHILD

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1c. LAST NAME: STOEN
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17b. DATE SIGNED BY PHYSICIAN OR OTHER ATTENDANT: 1-26-72
17c. ADDRESS: [illegible], Ca
17d. PHYSICIAN'S CALIFORNIA LICENSE NUMBER: A11087

LOCAL REGISTRAR

18. REQUEST ON SSCN FROM SOLICITATION LISTS
19. LOCAL REGISTRAR—SIGNATURE: Walter C. Brown MD
20. DATE ACCEPTED FOR REGISTRATION BY LOCAL REGISTRAR: FEB 2 1972

IN THE MATTER OF JOHN VICTOR STOEN

U-1-C

U-1 c-1 (1)

10/22/78 I have put this file in order and read it, together with the proposed opinion by Mr. Barnwell, and the comments in the memo by Sharon. Is far as I can see the opinion of Mr. Barnwell is fine.

An independent reading of the file (given my lack of knowlege of local proceedure) indicates the following:

1. There is not, and never has been an outstanding order for the arrest of Rev. Jim Jones.
2. There is an outstanding petition for a citation for Contempt which upon hearing could lead to an arrest order, but there is no order in the file to have such petition heard, there is no affidavit of service, and no hearing date set. Therefor there is no limit on Jims mobility, which is what Barnwell says.
3. There is an outstanding order for the arrest of John Victor Stoen, made by Judge Bishop and John Victor Stoen has been made a ward of the Court. There is a provision for a Bench Warrant being issued for his arrest, all by virtue of this same order dated 10 Sept. 1977. There is no indication in the register that a bench warrant was ever issued for John, nor that any instructions were issued to any authorised official to make the arrest. I am assuming that such papers would have to be made and entered in the file in order to actually hava a Marshall come out and physically ~~arrest~~ seize John.
4. That since Judge Bishop resigned himself from the case there has been no assignment to a new Judge, and that as a result the case is in total abeyance, and no further instructions could be made for the arrest of John unless an assignemnt to another Judge was made, unless Bollers made them himself.

IMPRESSIONS

I think that Luckhoo's advice to let sleeping dogs lie is wise. The only part that seems a bit tricky now to me is whether there could be an arrest of John based on the present record. I kind of doubt it, otherwise what would have prevented Hughes from having the Marshal come to Jonestown, take John out and put him on a plane for U.S.A. I think that they would have.....if the could have. However, this point could easily be clarified by Barnwell. I might point out that I think that the order of 10 Sept. 1977 is totally defective where the Judge attempts to permit the service of an Order for Contempt in any manner other than by personally serving Jim. I don't think that is permissable anywhere because of the quasi-criminal nature of contempt. I think that that is the point Luckhoo was continually harping on. However, I do feel that the Judge likely did have the Jurisdiction to make John a Ward of the Court, even on an ex-parte basis - of course subject to appeal for abuse of discretion, or because John was not represented or whatever.

CONCLUSION:

The only practical problem that I can see that we could remotely have would be that an arrest of John might be made if we tried to take him out of the country. I think that this is very remote, and not really possible under this state of the record, but this could be cleared up, I feel, by clearing up the one point I made, and by checking the register just before we take him out to be sure thatthere are no changes in the file.

DRAFT

u-1-c-1(2)

1977 No. 2584 DEMERARA

IN THE HIGH COURT OF THE SUPREM COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant

- and -

In the matter of an application by GRACE LUCY STOEN by and through her Lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub juciendum,

- and -

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

I, K.W. BARNWELL, Registrar of the High Court of the Supreme Court of Judicature of Guyana do hereby certify that so far as can be ascertained from the records in the Registry of the Supreme Court, there is no extant order of the Court or writ or other process directed to the Marshal of the Supreme Court ~~of the~~ or other lawful authority to arrest, apprehend, detain or other restrain ~~to~~ the person of Rev. Jim ~~James~~ Jones the respondent herein for any act of contempt committed by him contrary to any orddr made therein.

And that there exist~~s~~ an order granting leave to serve proceedings for contempt but no applicant ~~pursuit~~ pursuant thereto has yet been filed herein. And I further certify that any ~~applicant~~ application filed ~~file~~ pursuant to that order, will have to be heard and determined by a Judge of the High Court to be assigned by the Honourable Chief Justice, and, as of the date hereof, ~~as might assigned~~ no such assignment has yet been made.

/2...

AND FURTHER ~~And further~~ that by virtue thereof the said Jim ~~James~~ Jones ~~subject to~~ all just exceptions to all intents and purposes is free to move within or without the state of Guyana undisturbed and without restriction in full and free manner as the law permits.

Sharon Amos

U-1-c-1' (4)

Barnwell (visit with him by Sharon) 20/10/78

-Barnwell was extremely friendly (too friendly in a way) but he's kind of a flirt - I said I hoped he didn't mind that I had dropped by because I was in the area and so thought I'd drop in (it's good I did as his phone was out of order) -Jimmy was at an appt with Richard

-I invited him for dinner. He said he could come next week. I said that day and he said Wednesday. (I later thought it might be better for him to come when Marcie comes back if that is next Thursday and told him I'd call back and change it if she is available then/he said that would be OK -anyway when I said I hoped he didn't mind that I had dropped by - he said something about "no darling, I'd much rather you came by" (an older black man came to see him and he was told that Barnwell was too busy) but I was allowed to see him

-he first explained the case to me/ apparently he had been studying the situation/ he said that Sept 5 was an ex parti application for habeas corpus. Jeffrey Haas made that application and only one side was heard. Jefrey made application to have the infant (John) delivered and the order went to Bishop on the 6th and the order was granted

-yet another order was issued in pursuance of that order -that that order be served - Sept 8. They couldn't find JJ so they couldn't serve it

-so the judge made another order and the order was to affix 3 copies - 3 different places - the 4th copy was to go to J's personal secretary - this order stated that JJ was to appear Sept 10 but up to now there were no contempt proceedings

-technically of course service was not right anyway said Barnwell

-Haas went back on the 10th of Sept and made another order and this was that it would be nailed in a prominent place of the project

-this stated that since there was no appearance on behalf of the respondent, there would be a bench warrant for the arrest of the infant, who is now in the custody of the respondent.

-then it was stated by the court that "leave is hereby granted to serve proceedings of contempt" The court would then remove to put JJ in prison because on the 8th of Sept he is in default of the court

-however the proceedings of contempt were not served.

-on the 14th the judge said that "application is coming up for further consideration of this matter. (Barnwell said that this doesn't make sense, why would they make further consideration of this matter if they had already agreed to put him in contempt. His interpretation of this is that the proceedings are thus extant (meaning non-existant -spelling might be wrong) - in other words the judgeis admitting he is starting all over on this

-he said you can't have 6 orders open - if you give permission to serve the order for contempt -then there is no contempt proceedings and in this permission he is saying the court would affix 3 copies - order for arrest of child

-he said that in light of this -- he could draft a certificate on closer exam/ this would be "What is now before me is not to execute any proceedings for contempt but to await an order of the court whereby such proceedings will be issued.

(I said this didnt sound too good as the court might issue such while JJ is still recooperating)

-he said the order (arrest order) has been removedby necessary implication or repeal

-he said that they failed to bring in the child by service on the tree (he said he couldn't imagine the judge Bishop putting an arrest order out for the child in the first place. He said this judge is quite weak. You don't arrest a child/ Barnwell said he wnewer would do that.

-he said the other order saying he gives the order giving permission to serve the order for contempt removes the first order and since the second order was not served/ there is no order out forJ's arrest

-I asked him if there is no arrest order/ can he put that in writing--that there is no arrest order against JJ

-he took time explaining this and I thanked him for helping out/ he said "you are quite an extraordinary woman" -I said "Well I'm learning"

-he said "well we could learn all kinds of things.....?

-he said Luckhoo did apply to have all the proceedings dismissed as erroneous but the decision was never made-

-he said that since there are 2 separate orders than it is him the Registrar who has to interpret it - he is the man to obey on this (as he handles the orders)

-I told him that I'd like him to meet Marcie. Told him she was quite a woman/ he'd like her. She was quite attractive I said (thinking he only related on those terms) - he said "All american women are attractive"

-When I asked if he could put it in writing about JJ not being arrested, he told me that I could talk him into anything and that I was pretty as a picture

-he seems to talk in these terms to women in general/ some issue came up on the phone and he was talking about "preserving the flower's (woman"s) honor - and not allowing this woman to be trampled upon (this was some case (OVER)

PETITION

U-1-C-1 (5)

THIS IS A LIST OF SUPPORTERS OF OUR PROJECT IN JONESTOWN, GUYANA, WHO PROTEST HARASSMENT BY A SMALL SEGMENT OF REACTIONARY BIGOTS. TROTSKYITES ARE TRYING TO HURT US BECAUSE OF OUR PROGRESSIVE HUMANITARIAN WORKS, WHEREAS WE HAVE TRIED TO BUILD A PEACEFUL SOCIETY WITH GUYANA.

J. Daryl Turberg
Robin Drukane
S O Slemeng
Larry Long
Richard Balstein
Robert Glover
Richard Syberg
Katherine A. Goldner
Kenney Fay
Louise Ling
David P Knopp
Debbie Hofacre
Glen J Killner
Diane M. Bogdanovich
Vincent J Lovill
Bradley Spear
Jeffrey J Rudd
Phil Hill
Ronald Dwyer

he was dealing with and sending o[redacted] Marshall but he talked in these terms)
-he also got on the phone with Winnie Agard and called her darling
-I asked to call home and he said "don't tell me, are you missing your husband so much" (I didn't know what to say so I didn't deny I had a husband but just said "no no")

DICTATION OF THE CERTIFICATE HE WILL WRITE (he had talked to both Mingo and Bollers before this)
"SO FAR AS CAN BE ASCERTAINED FROM RECORDS OF THE SUPEREME COURT REGISTRY THERE IS NO EXTANT ORDER OF COURT TO BE EXECUTED FOR ANY CONTEMPT COMMITTED BY REV. JIM JONESWHAT EXISTS IS AN ORDER GRANTING LEAVE FOR THE APPLICANT TO SERVE PROCEEDINGS OF CONTEMPT AND NO PROCEEDINGS HAVE YET BEEN FILED. (He said to file you would have to go thru the whole process))
NO PROCEEDINGS HAVE YET BEEN FILED PERSUANT TO THAT ORDER. FURTHER IF IT IS FILED PURSUANT TO ANY APPLICATION WILL HAVE TO BE HEARD BY A JUDGE ASSIGNED BY THE CHIEF JUSTICE AND NO SUCH ASSIGNMENT HAS YET BEEN MADE"

(the above wording that is capitalized is what he dictated for this certificate.
-I said can you say that because JJ needs medical care, no order will be made in the future while he is receiving medical care. He said he could not say that (i pushed on this several times)
-but he did say that if the above is not acceptable, we could try to slide somethigng in/ I told him that if he thought of something to add to please add it - if it would help. I said how would you feel if it were yourself or someone you cared about.

-I asked if I could copy the whole file and he said I could. He let me take it home in a car and sent his nephew with me who is the 2nd Marshall Desmond Barnwell. Desmond came home with me and waited while we xeroxed the whole thing and had a couple of drinks. He took our phone number and flirted with Mary, and Evelyn and told Evelyn he'd call her back. Called Mary and chatted with her. He's a dumb guy.

-he told me that Barnwell (his uncle) had told him to bring me back with the papers. He said his uncle had the biggest house on the East Coast a real mansion and lives near the PM - he said the house has 12 rooms upstairs and 12 rooms downstairs. He Desmond lives with his brother (or just says that to impress women).

-luckily Reg. Barnwell wasn't therewhen I got there so I just left the case with his brother desmond and left a bottle of whisky and some cookies for the Reg.

-when I invited the Reg. for dinner, I asked what he liked to eat and said "does he like chicken" - he said he preferred steak so I said we'd have steak (I guess we should try to give the man what he likes?????)

-Reg said he enjoyed putting our heads together (working on this case.) He kept walking over to my side of the desk and asked if I minded that. He touched me on the arm a couple of times and when I left gave me a hug (not too lusty, just friendly). He said other suggestive things like it was enjoyable being in this close contact with me. Then he told me you can never know what will happen. Said he had a clerk working for him that got a phone call, heard this woman's voice and married her. (I didn't remind him he's already married)
-he said he felt very comfortable with me

dinner: when I first asked him if he could come for dinner/ he said "Well this isn't a Russian prison system yet" (in other words he wasn't prevented from having civil rights like in Russia

Re Adbrey Bishop : he said this is confidential but the legal system is good but that judge is weak.

PETITION

THIS IS A LIST OF SUPPORTERS OF OUR PROJECT IN JONESTOWN, GUYANA, WHO PROTEST HARASSMENT BY A SMALL SEGMENT OF REACTIONARY BIGOTS. TROTSKYITES ARE TRYING TO HURT US BECAUSE OF OUR PROGRESSIVE HUMANITARIAN WORKS, WHEREAS WE HAVE TRIED TO BUILD A PEACEFUL SOCIETY WITH GUYANA.

Lisa D. Ellis

Carolyn Layton

Pat Martin

Perry R. Wilson Sr.

Paulette Thomas

Lloyd

Ronnie Morgan

Anthony Rosales

Anthony

Paula Allen

Judith Thomas

Cecilia Vaughn

Michael Bowen

Michael Bowen

Chris Franklin

Linda Anderson

U-1-c-f (8)

1977 No. 258/ DEMERARA

CLARENCE HUGHES (Barrister-at-Law)

In the matter of JOHN VICTOR STOEN,

- and -

In the matter of an application of by GRACE LUCY STOEN, by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub-Juciendum.

1977 No. 258/4 SUPREME COURT—No. 96.

September	5	th	Ex-parte application By way of affidavit filed
September	5	th	Exhibits 'A' 'B' 'C' 'D' Laid over.
September	6	th	Lucas Bishop J. (Ag.) Mr. C. A. Hughes for Applicant. Order granted directing that the detainee be produced before the court on the application. Not before on 8/9/77
September	6	th	Order entered. Writ of Habeas Corpus Ad Subjiciendum issued.
September	8	th	Notice filed. Lucas Bishop J. (Ag.) Mr. C. A. Hughes for Applicant. Application granted for detainee to be produced. Certified copies to be made. The (3) to be affixed to the gate and for [illegible] constituting the Respondents [illegible]

Mission Compound, Kaduna, N.W.P. and the fourth (4th) to be served on the personal secretary or the member of staff within the said Compound as holding himself or herself as a servant and/or agent of the said Jim Jones.

Returnable for Saturday 10th September, 1977 at 9.00 a.m.

Sept. 8th Order entered.

Sept. 10th Coram Bailey J. (Chs)

Mr. C.A.C. Hughes for Applicant.

No appearance of or for Respondent.

Mr. Hughes makes application for the following orders:

(a) Order for issue of Bench Warrant to compel child attendance

(b) Order for custody of said child pendente lite.

(c) Order for leave to serve proceedings for contempt on Jim Jones.

(d) Order for substituted service of proceedings on said Jim Jones should personal service prove impossible.

Leave substituted service as consistent with that employed as directed by Order of Court dated 8.9.77

All orders prayed for above granted. Strict proof of identification.

Costs #1,250.00

September 16th Affidavit of service filed.

16th Notice of Motion filed and fixed for 23rd September, 1977 at 9.00 a.m. before C.J.

September 20th Summons filed and fixed for Friday 23rd Sept. at 9.00 a.m.

U-1-C-P (1.0)

SUPREME COURT No.

1977 No. 2587

	September 20		Affidavit in support of summons filed
	September 23		Coram Bishop J (Chb)
Chambers Ct 4			Mr C A F Hughes for Applicant
Pgs 4-5			Sir Lord Luckhoo, Mr C Lloyd Luckhoo S.C.
			and Mr Edward Luckhoo / Mr M A M McDonald
			for Jim Jones
			Mr Hughes commences his arguments
			Adj to 26/9/77 at 10.30 a.m.
	Sept 26	"	Coram Bishop J (Chb)
			Appearances as before
			Mr Hughes continues his arguments
			Mr Luckhoo commences his reply
			Adj to 28/9/77 at 3.00 p.m.
	Sept 28	"	Coram Bishop J (Chb)
			Appearances as before
			Mr C L Luckhoo continues his reply
			Adj to 29/9/77 at 3.00 p.m.
	Sept 29	"	Coram Bishop J (Chb)
			Appearances as before
			Mr C L Luckhoo ~~continues~~ commences his reply
			Adj to 30/9/77 at 3.00 p.m.

30. Coram Bishop J. (Obs.) U-1-9-1(11)

Appearances as before.

Sir Lionel Luckhoo s.c. replies.

Adj. to 3.10.77 at 3.00 p.m.

October 3rd Coram Bishop J. (Obs.)

Appearances as before.

Mr. Hughes replies to the arguments on the Preliminary objections.

Per Lionel Luckhoo s.c. replies to Mr. Hughes' submission.

Ruling on preliminary objection reserved, and to be given on Thursday 6th October, 1977 at 3.00 p.m.

October 6th Coram Bishop J. (Obs.)

Appearances as before.

Preliminary objection over-ruled.

Leave granted at (a) as prayed by Joyce Touchette s.c.

Joyce Touchette of Jonestown, Port Kaituma, North West District, Kaituma, be added and joined as a Respondent/Defendant in the said case 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 the said matter.

Leave to Mr. Hughes on behalf of Sydney Stoen to file Affidavit in Answer to Joyce Touchette within 21 days and to said Joyce Touchette to file Affidavit in Reply within 10 (ten) days if necessary.

Adj. to Friday 18/11/77 at 9.00 a.m. for Report.

November	18th.	Coram Bishop J. (Chs)
		Mr. C.A.F. Hughes for Applicant.
		Adj. to 10.12.77 at 9.00 a.m. for fixture.
December	10th.	Coram Bishop J. (Chs)
		No appearance of or for parties.
		Matter adj. to a date to be fixed.
		Fixed for 7.1.78 at 9.15 a.m.
December	16th.	Affidavit in Answer filed.
	16th.	Authority to Solicitor filed.
1978 January	7th.	Coram Bishop J. (Chs)
		Appearances as before
		Paragraphs 1, 2 and 3 of Space Law Item. Affidavit admitted
		Arguments as to the admissibility of the remaining paragraphs taken.
		Adj. to Tuesday 10.1.78 at 3.00 p.m.
January	10th.	Coram Bishop J. (Chs)
		Appearances as before.
		Arguments completed.
		Decision reserved.
		for Delivery before Bishop J.
		on 12/1/78 at 11.00 a.m.
		Notice placed

Notice ent.

U-1[illegible](13)

August 12th Coram Bishop J.

Appearances as before.

Trial Judge declines to continue hearing of matter;

There have been persistent efforts from either side or

approbrious nature in the form of letters and other

documents, as well as telephone calls, intended to influence

the outcome of the proceedings in favour of one side or

another.

Matter referred to the Chief Justice for re-assignment.

Each party to bear his own Cost.

HUGHES, FIELDS & STOBY,
LEGAL PRACTITIONERS.

CLARENCE A. F. HUGHES, LL.B. (Hons.) (Lond.)
BARRISTER-AT-LAW.
RICHARD BERKELEY FIELDS,
BARRISTER-AT-LAW.
ROBIN M. S. STOBY, LL.B. (Hons.) (Leeds)
BARRISTER-AT-LAW.
with
HENRY BRITTON FRASER,
COMMISSIONER OF OATHS,
SOLICITOR.

DIAL 64978

HUGHES, FIELDS & STOBY CHAMBERS
62, Hadfield & Cross Streets,
Georgetown, Guyana,
South America.

U-1-E-1(4)

COPY

EX. "B"

REGISTERED:

14 October 1977.

Our ref:
570-77

Mrs Joyce Touchette
Jonestown
Port Kaituma
Northwest District

Dear Madam,

Re: JOHN VICTOR STOEN

We write on behalf of Mrs. Grace Lucy Stoen, the mother of the abovenamed infant.

We are instructed that you allege that you now have the said infant in your possession, and you further claim that this infant is in your possession with the consent of our client.

We are instructed to reiterate our client's revocation of any permission or authority which you may have had for retaining the said child in your custody. Enclosed please find a photocopy of a Revocation of previous powers of attorney and authorisations re guardianship of the minor child, John Victor Stoen, which was duly executed before a Notary Public on the 30th day of August 1977 at San Francisco, U.S.A.

We are instructed to inform you that we have been authorised by our client to take custody of the said child forthwith, and this is to demand that you deliver up possession of the said child immediately you receive this letter.

We trust that you will comply with this demand without hesitation.

Yours faithfully,
HUGHES, FIELDS & STOBY
Per:

Sgd. C.A.F. Hughes

Clarence A.F. Hughes.

cc:
Messrs Luckhoo & Luckhoo, Legal
Practitioners, with copy for
Mrs Touchette.

Encl.

1977 No. 2584 DEMERARA U-1-(15)

IN THE HIGH COURT OF THE SUPREME COURTOF JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN DATE 3/9/77

In the matter of JOHN VICTOR STOEN, an infant

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub jaciendum,

- and -

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

EXPARTE APPLICATION BY WAY OF AFFIDAVIT:

I, JEFFREY ALLEN HAAS, of 3609 Sacramento Street, San Francisco, California, United States of America, being duly sworn make oath and say as follows:-

1. That I am an Attorney At Law admitted to practise in the State of California and am the attorney of record for Grace Lucy Stoen.

2. That as attorney of record for the said Grace Lucy Stoen I am duly authorised and have been specially authorised by the said Grace Lucy Stoen to appear on her behalf in the above-mentioned matter, and to make this application on her behalf.

3. On 23rd February, 1977, I caused to be filed in the Superior Court in and for the County of San Francisco, State of California, a Petition for dissolution of the marriage between Grace Lucy Stoen and Timothy O. Stoen. Inter Alia, a demand for custody of the infant, JOHN VICTOR STOEN, aged five years was made. A filed copy of the said Petition is attached hereto and marked Exhibit 'A'.

No. 016382
Paid 10/9/77
11.00 a.m.

84-4200-2018

U-1-c-1 (16)

4. That hereto attached and marked Exhibit "B" is a certified copy of the Certificate of Birth of the said John Victor Stoen, which shows that the child was born on the 25th day of January, 1972.

5. By an order of the said Superior Court made on the 26th day of August, 1977, legal custody of the said John Victor Stoen was awarded to the said Grace Lucy Stoen. A filed certified copy of the said Order of Court is attached hereto and marked Exhibit "C". There has been no appeal against the said order.

6. That I am informed and verily believe that Grace Lucy Stoen, Timothy O. Stoen, John Victor Stoen and Jim Jones are all citizens of the United States. At the time of the filing of the Petition for dissolution, Grace Lucy Stoen, Timothy O. Stoen and Jim Jones were residing in and domiciled in San Francisco, California. I am also informed by Mr. Charles Garry, attorney for Jim Jones that the said infant, John Victor Stoen was taken to the Peoples' Temple Agricultural Mission in Guyana in October, 1976. Prior to the said removal, the infant had lived his entire life in California. Grace Lucy Stoen and Timothy O. Stoen have lived their entire married life in California. Jim Jones left San Francisco in June 1977. I am informed that he is in Guyana at the People's temple Agricultural Mission in North West District.

7. I have been informed by Jim Jones' attorney Charles Garry, and Richard Mc Coy, First Secretary-Consul of the United States Embassy in Guyana that the said infant is with the said Jim Jones in Kaituma at the People's Temple Agricultural Mission. The said infant remains in Guyana against the wishes and without the approval of his ~~mother~~ mother Grace Lucy Stoen and in direct violation of the said Court Order. In addition to the Superior Court granting custody to the said Grace Lucy Stoen, it further directed that the infant be brought before the Court on October 6th, 1977

8. That repeated requests have been made for the return of the said infant. The said Jim Jones has refused and/or neglected to deliver up possession of the said infant to the said Grace Lucy Stoen and continues to do so. That I have also written

u-1-c-1 (17)

to the attorney for the said Jim Jones demanding the return of the said child but without success. Hereto attached and marked Exhibit "D" is a copy of the said letter. That I am also informed and verily believe that the said Grace Lucy Stoen has also made repeated requests for the return of the said child but without success. The respondent has refused to deliver up possession of the said infant and continues to do so.

9. That on the 18th day of August 1977 the said Grace Lucy Stoen made a petitioner's declaration under penalty of perjury wherein is set out some of the conditions to which the said infant is being subjected. Hereto attached and marked Exhibit "E" is a copy of the said petitioner's declaration. The said petitioner's declaration has been filed in the Superior Court of California and is part of the official records of the Court.

10. That I was informed by Charles Garry, the attorney for the said Jim Jones that he has advised Jim Jones to remain out of the United States of America. That I am also informed and verily believe that various Governmental Agencies in the United States of America are investigating the said Jim Jones.

11. That I respectfully submit to this Honourable Court that unless the infant were removed forthwith from the possession of the said Jim Jones, irreparable harm and damage would be done to the said infant.

12. That I am advised by Counsel and verily believe that the detention of the said infant by the said Jim Jones is unlawful and that I am entitled to the possession of the said infant by virtue of the express wishes and authority of the mother Grace Lucy Stoen given to me.

13. That I accordingly apply to this Honourable Court for an order directing the said Jim Jones to deliver up to me forthwith the said infant John Victor Stoen, or for such further order or relief as to this Honourable Court may seem fit.

U-1-C-4 (18)

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant

- and -

In the matte of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub Juciendum.

- and -

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

EX PARTE APPLICATION by WAY OF AFFIDAVIT:

H.B. FRASER/DABI DIAL
Solicitor to Applicant.

Proceedings filed on 10/9/77 at Lokmanu Bauai at 11:40 am
per Cathe C Martin
Reg No 01682

U-1-C-1 (19)

14. That I hereby authorise Mr. Henry Britton Fraser and/or Dabi Dial, Solicitor to act as my Solicitor in the above cause and to all acts and things necessary in connection therewith and to give good and valid receipts therefor on my behalf. The address for service and place of business of my said solicitor is at my office Messrs. Hughes, Fields and Stoby, Legal Practitioners, 62 Hadfield & Cross Streets, Georgetown, Demerara.

Sworn to at Georgetown, Demerara,
This 5 day of September, 1977,

Before Me,

JACNARINE BUDHOO
A COMMISSIONER OF OATHS.
Justice of Peace
Commissioner of Oaths to Affidavit

REVENUE JAMAICA ONLY 50 Guyana

U-1-C-1 (20)

JEFFREY A. HAAS, ESQ.
3609 Sacramento St.
San Francisco, CA 94118
(415) 922-6200

MARGARET RYAN, ESQ.
294 Page St.
San Francisco, CA 94102
(415) 626-0979

Attorneys for Petitioner

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

In Re the Marriage of:	No. 719-147
Petitioner: GRACE LUCY STOEN	PETITIONER'S DECLARATION PURSUANT TO RULE 8.2.64
and	
Respondent: TIMOTHY O. STOEN	

I, GRACE STOEN, declare the following under penalty of perjury.

I am the mother of JOHN VICTOR STOEN, d.o.b. J[illegible] 25, 1972. As set forth in my declaration of August 11, 1977, I have been attempting to secure the return of my son since I left the PEOPLE'S TEMPLE in July, 1976. Unless this Court acts immediatel psychological, moral, and possible physical harm will continue to be done to JOHN.

I base my allegation on the following facts:

A common method of discipline within the PEOPLE's TEMPLE is the beating of members before the assembled membership. Microphones are placed near the mouth of the person beaten so tha the intensity of their screams will not be lost on the audience.

MARGARET RYAN
ATTORNEY AT LAW
294 PAGE STREET
SAN FRANCISCO, CA 94102
(415) 626-0979

Children are not excluded from watching the public beatings. In fact, they are encouraged and sometimes required to watch them.

While I was a member of the TEMPLE, JOHN and [illegible] were present at many public beatings. On one occasion, a girl of seven was beaten well beyond the point at which she began to scream. On another occasion, a girl of eleven was straddled spread-eagled and beat seventy-five to one hundred times. On still another occasion, a young woman was beaten until both of her eyes were swollen shut.

The above is by no means an exhaustive list of public beatings which took place during my time in the TEMPLE. The majority of the members of the TEMPLE were "brought up" before the membership for punishment at some time. Not all of the beatings caused serious injuries. Some merely served to degrade a selected member because of an alleged wrong. Members who did n[illegible] say "Thank you, Father" to the REV. JONES at the conclusion of a punishment directed by him were beaten more.

Before the assembled membership, REV. JONES claimed at various times to be the reincarnation of Buddha, Jesus Christ, and Lenin. On several occasions when JOHN was present, the REV. JONES exhibited bloody hands, which he instructed the congregation were stigmata. REV. JONES consistently and incessantly presented himself as our ultimate moral authority. Anyone who questioned this premise was "brought up" for punishment.

REV. JONES worked effectively and persistently to indoctrinate the children of TEMPLE members to believe in his moral authority and fear his power to impose horrifying punishmen

MARGARET RYAN
ATTORNEY AT LAW
[illegible] PAGE STREET
SAN FRANCISCO, CA 94102
(415) 626-0[illegible]

JOHN and other children were present when a fifteen year old youth passed out after being beaten; they saw a young girl vomit after her punishment required her to enter a boxing match with a far more skilled opponent; they frequently heard threats of an instrument known as the "Blue Monster" which would administer shock treatments to the unworthy; they were required to [illegible] and ridicule members selected for public humiliation under pain of being punished themselves.

I do not believe that JOHN has any direct knowledge of the coercive and fraudulent means which the TEMPLE has used to secure transfers of land and money. Nor do I believe he has direct knowledge of the fact that money received by the TEMPLE for care of the aged is diverted for other projects, leaving the aged poorly cared for. However, the twisted sense of morality which authorizes these acts cannot have escaped him.

The twisted moral code which REV. JONES imparts on members of the TEMPLE may be summarized as follows: REV. JONES advocates social justice, racial equality and the brotherhood of man. He is the [illegible] incarnation of a host of divinities from other ages. It is his mission to search out and eradicate loathsome traits within members of congregation, even though they may not always wish his help. The severe beating of a young child for a minor infraction becomes an act of divinity.

Members of the TEMPLE including minors are frequently required to sign statements authorizing physical punishment of themselves and their children. These statements are in turn used by the TEMPLE as license for intimadation and degradation.

PT 84 1206-2018

I respectfully and urgently request that this court act at once to remove my son from the physical custody of REV. JONES to prevent further psycholodgical, moral, and emotional harm and possible physical injury from happening to him.

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

Executed this 18 day of August, 1977 at San Francisco, California.

Grace Lucy Stoen

GRACE LUCY STOEN

U-1-C-1 (24)

August 25, 1977

Mr. Charles Garry
Attorney at Law
1256 Market Street
San Francisco, California

Re: Grace Stoen vs. Timothy Stoen (Dissolution)

Dear Mr. Garry:

In accordance with Judge King's directive, please find enclosed a copy of the order arising out of the hearing on August 19, 1977. As you will recall, one of the notice requirements was for service of the papers on your office. The enclosed order incorporates a notice of the Order to Show Cause hearing now set for October 6, 1977 before Judge King.

Demand is hereby made on you in your capacity as the legal representative of both the People's Temple and Mr. Jim Jones for return of the minor child, Jon Victor, to his mother in accordance with the court order. I trust that we can expect your cooperation and compliance.

Very truly yours,

JEFFREY A. MAAS
DAUGHERTY RYAN
JAM:kh
Encl.

cc: Grace Stoen

(25)

JEFFREY A. HAAS
Attorney at Law
3609 Sacramento Street
San Francisco, CA 94118
(415) 922-6200

MARGARET RYAN
Attorney at Law
294 Page Street
San Francisco, CA 94117
(415) 626-0979

Attorney for Petitioner

FILED
AUG 26 1977
CARL M. OLSEN, Clerk
By ..... Deputy Clerk

THE ANNEXED INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN MY OFFICE
ATTEST: CERTIFIED
AUG 26 1977
CARL M. OLSEN, COUNTY CLERK OF SAN FRANCISCO, AND EX-OFFICIO CLERK OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO
By ..... Deputy

FILED
San Francisco County Superior Court
AUG 26 1977
CARL M. OLSEN, Clerk
By ..... WALKER ..... Deputy Clerk

THE ANNEXED INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN MY OFFICE
ATTEST: CERTIFIED
AUG 26 1977
CARL M. OLSEN, COUNTY CLERK OF SAN FRANCISCO, AND EX-OFFICIO CLERK OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO
By ..... Deputy

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

IN THE CITY AND COUNTY OF SAN FRANCISCO

In re the Marriage of:	Case Number 719-147
Petitioner: GRACE LUCY STOEN	ORDER RE CHILD CUSTODY (REVISED)
and	
Respondent: TIMOTHY O. STOEN	

GOOD CAUSE APPEARING:

(1) Petitioner is awarded custody of JOHN VICTOR STOEN, age 5, d.o.b. 1/25/72 pending further order of this court.

(2) Petitioner's Order to Show Cause Re Custody is continued for further hearing until October 6, 1977, Dept. 13 at 9:00 a.m.

(3) Pursuant to Section 5160(2) of the California Civil Code, Respondent TIMOTHY O. STOEN is ordered to appear before this court on October 6, 1977 at 9:00 a.m., Room 481, City Hall, to show cause why Petitioner should not be awarded custody of said minor.

(4) Pursuant to Section 5160(2) of the California Civil Code, Respondent TIMOTHY O. STOEN is advised that a failure to appear at the time and place designated above may result in a decision adverse to him.

SUPERIOR COURT CITY AND COUNTY OF SAN FRANCISCO

U-1-C-1 (26)

(5) Pursuant to Section 5154(1) of the California Civil Code, the court directs that service of this order, the summons and petition upon Respondent shall be deemed to have been effected upon proof of the doing of the following acts: (1) publication of this order and the [illegible] in The Recorder, a newspaper of general circulation for four times in four successive weeks as provided in Government Code 6064, the last day of publication shall be no later than September 23, 1977 and (2) the mailing of a copy of this order, the summons and petition by first class postage prepaid to PATRICK HALLINAN, Attorney at Law, 345 Franklin Street, San Francisco, California. Said mailing shall occur no later than September 1, 1977. In the alternative Respondent STOEN may be personally served.

(6) 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.

(7) Pursuant to Section 5154(1) 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 REVEREND 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 prepaid 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, 1256 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 four times in four successive weeks as provided in [illegible]

U-1-C-1 (27)

Code 6064. The last day of publication shall be no later than September 23, 1977. In the alternative, REV. JONES may be personally served.

(8) Pursuant to Section 5160(2) of the California Civil Code, Claimant REV. JIM JONES is ordered to appear before this court on October 6, 1977, Room 481, City Hall, with said minor to show cause why Petitioner should not be awarded custody of said minor.

(9) 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.

(10) 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.

(11) The parties and their agents are restrained from said minor from the City and County of San Francisco pending further order of this court.

Dated: AUG 26 1977

DONALD E. KING

JUDGE OF THE SUPERIOR COURT

U-1-C+1 (28)

B

CERTIFICATE OF LIVE BIRTH

STATE OF CALIFORNIA—DEPARTMENT OF PUBLIC HEALTH

STATE BIRTH CERTIFICATE NUMBER | LOCAL REGISTRATION DISTRICT AND CERTIFICATE NUMBER: 4900-170

THIS CHILD

1a. NAME OF CHILD—FIRST NAME: JOHN
1b. MIDDLE NAME: VICTOR
1c. LAST NAME: STOEN
2. SEX: MALE
3a. THIS BIRTH, SINGLE OR TWIN OR TRIPLET: SINGLE
3b. IF TWIN OR TRIPLET, THIS CHILD BORN 1ST, 2ND, 3RD:
4a. DATE OF BIRTH—MONTH, DAY, YEAR: JANUARY 25, 1972
4b. TIME: 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 CORPORATE 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, CAL
8. AGE OF MOTHER (AT TIME OF THIS BIRTH): 21 YEARS
9. COLOR OR RACE OF MOTHER: CAUCASIAN
10a. RESIDENCE OF MOTHER—STREET ADDRESS OR RURAL ROUTE NUMBER: 6500 EASTSIDE CALPELLA ROAD
10b. INSIDE CITY CORPORATE 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 95482

FATHER OF CHILD

11a. NAME OF FATHER—FIRST NAME: TIMOTHY
11b. MIDDLE NAME: OTTER
11c. LAST NAME: STOEN
12. BIRTHPLACE (STATE OR FOREIGN COUNTRY): MILWAUKEE, WISCONSI
13. AGE OF FATHER (AT TIME OF THIS BIRTH): 34 YEARS
14. COLOR OR RACE OF FATHER: CAUCASIAN
15a. OCCUPATION OR LAST OCCUPATION: ASST. DIST. ATTORNEY
15b. KIND OF INDUSTRY OR BUSINESS: LEGAL

INFORMANT'S CERTIFICATION

I HEREBY CERTIFY THAT I HAVE REVIEWED THE ABOVE-STATED INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

16a. SIGNATURE OF OTHER INFORMANT (OTHER THAN PARENT, SPECIFY): Grace Lucy Stoen
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. SIGNATURE (OR OTHER PERSON WHO ATTENDED) — SIGNATURE—DEGREE OR TITLE: L S Bolli MD
17b. DATE SIGNED BY PHYSICIAN OR OTHER ATTENDANT: 1-26-72
17c. ADDRESS: Santa Rosa, Ca
17d. PHYSICIAN'S CALIFORNIA LICENSE NUMBER: A14087

LOCAL REGISTRAR

18. REQUEST OMISSION FROM SOLICITATION LISTS
19. LOCAL REGISTRAR—SIGNATURE: Walter C. Brown MD
20. DATE RECEIVED FOR REGISTRATION BY LOCAL REGISTRAR: FEB 2 1972

MEDICAL AND HEALTH DATA

PREVIOUS DELIVERIES TO THIS MOTHER (DO NOT INCLUDE THIS CHILD): NONE
21a. HOW MANY OTHER CHILDREN ARE NOW LIVING: NONE
21b. HOW MANY OTHER CHILDREN WERE BORN ALIVE BUT ARE NOW DEAD: NONE
21c. HOW MANY FETUSES WERE BORN DEAD AFTER 20 WEEKS GESTATION: NONE
21d. DATE OF LAST LIVE BIRTH (ENTER MONTH, DAY, YEARS): NONE
21e. DATE OF LAST FETAL DEATH (ENTER MONTH, DAY, YEARS): NONE
22. DATE LAST NORMAL MENSES BEGAN (ENTER MONTH, DAY, YEAR): APRIL 10, 1971
23. PRENATAL CARE BEGAN (MONTH, 3RD, ETC—IF NONE, SO STATE): 2nd
24. WEIGHT AT BIRTH: 7 LBS. 8 OZS.
25. LENGTH AT BIRTH (CROWN-HEEL): 20 INCHES
26. COMPLICATIONS RELATED TO PREGNANCY (DESCRIBE OR IF NONE, SO STATE): None
27. COMPLICATIONS OF LABOR AND DELIVERY (DESCRIBE OR IF NONE, SO STATE): Occipit posterior - Mid forceps delivery
28. CAESAREAN SECTION (SPECIFY YES OR NO): NO
29. BIRTH INJURY TO CHILD (DESCRIBE OR IF NONE): None
30. CONGENITAL MALFORMATIONS OR ANOMALIES (DESCRIBE OR IF NONE, SO STATE): None
31. INFANT DEATH—(ENTER DATE OF DEATH)
32. [illegible] DATA
REQUEST OMISSION FROM SOLICITATION LISTS

STATE REGISTRAR

A. | B. | C. | D. | E. | F.

REV. 1-1-69 Form VS-10

The within Document is a correct copy of the record in this office.

ATTEST: AUG 19 1977

HERB SNYDER, JR.
County Recorder In and for Sonoma County, State of California
By: B. Dove, Deputy

U-1-C-1 (29)
Exc. 16

DAVID A. HAAS
3609 Sacramento Street
San Francisco, Ca 94118
922-6200

Attorney(s) for Petitioner

ENDORSED
FILED
FEB 23 1977
CARL M. OLSEN, Clerk
RICHARD E. METTER
Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO

In re the marriage of

Petitioner: GRACE BUCY STOEN
and
Respondent: TIMOTHY O. STOEN

CASE NUMBER
[illegible]

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)
[illegible] 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(1)

2. Statistical information:

a. Husband's social security number: unknown Wife's social security number: 563-88-0448

b. Date and place of marriage: 5/27/70, 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 (Number) children of this marriage including the following minor children:

Name	Birthdate	Age	Sex
John Victor Stoen	1-25-72	5	Male

U-1-C-1 (30)

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 (not) be awarded Petitioner (Petitioner/Respondent)

d. ☒ Property rights be determined as provided by law

e. ☒ Attorney's fees and costs (not) be awarded 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.

/s/ (Attorney for Petitioner)

/s/ (Signature)
Grace Lucy Stoen (Type/print name)

A declaration under penalty of perjury must be executed within California. An affidavit is required if executed outside California.

U-1-CH(31)

1977 No. 2584 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant.

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub juciendum.

- and -

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

SUPREME COURT REGISTRY GEORGETOWN DATED 6/9/77

WRIT OF HABEAS CORPUS AD SUBJICIENDUM

TO JIM JONES
Kaituma,
North West District.

YOU ARE COMMANDED that you have before Mr. Justice Bishop in Chambers in the High Court of the Supreme Court of Judicature, Georgetown, on the day and at the time specified in the Order of Court served with this Writ, the body of John Victor Stoen, being taken and detained under your custody as is said, together with the day and cause of his being taken and detained, by whatsoever name he may be called therein, that a Judge may then and there examine and determine whether such cause is legal, and have there then this Writ.

Dated the 6th day of September, 1977.

DEPUTY REGISTRAR OF THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE.

This Writ was issued by Mr. H.B. Fraser, Solicitor for the Applicant.

U-1-C-1 (32)

1977 No. 2584 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub Juciendum,

~~In the~~ - and -

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

BEFORE JUSTICE BISHOP (IN CHAMBERS)

DATED THE 6TH DAY OF SEPTEMBER, 1977

ENTERED THE 6th DAY OF SEPTEMBER, 1977.

WHEREAS Mr. Justice Bishop has granted a Writ of Habeas Corpus directed to Jim Jones at Kaituma North West District commanding him to have the body of JOHN VICTOR STOEN before this Court on Thursday the 8th day of September 1977 at 9 O'clock in the forenoon.

TAKE NOTICE that you are required by the said Writ to have the body of the said JOHN VICTOR STOEN before this Court on Thursday the 8th day of September, 1977 at 9 O'clock in the forenoon and to make a return to the said Writ. In default thereof the said Court will then, or soe soon thereafter as Counsel can be heard, be moved to commit you to prison for your comtempt in not obeying the said Writ.

BY THE COURT

DEPUTY REGISTRAR

THE SUPREME COURT OF JUDICATURE OF GUYANA

U-1-C-1 (33)

1977 No. 2584 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub Juciendum

- and -

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

BEFORE JUSTICE A.F.R. BISHOP. (IN CHAMBERS).

DATED THE 8TH DAY OF SEPTEMBER, 1977.

ENTERED THE 8TH DAY OF SEPTEMBER, 1977.

UPON the ex-parte application by way of affidavit of JEFFREY ALLEN HAAS filed herein on the 8th September 1977 AND UPON HEARING Counsel for the Applicant IT IS ORDERED that the order of Court made herein on the 6th September 1977 and Writ of Habeas Corpus issued out of this Court on the said 6th day of September 1977 be served on JIM JONES by affixing three certified copies of the said Order of Court Writ of Habeas Corpus and copy of this Order to three different places on the gate of/or other building constituting the People's Temple Agricultural Mission at Kaituam North West District and that a fourth copy be served on the Personal Secretary or a member of staff within the said compound holding himself or herself out as a servant or agent of the said JIM JONES AND IT IS FURTHER ORDERED that the said Writ be returnable for Saturday of the 10th September 1977 at 9.00 a.m. and that he do appear and bring the body of JOHN VICTOR STOEN before the said Court as ordered on the 6th September 1977.

BY THE COURT

DEPUTY REGISTRAR (Ag.)

1977 No. 384 DEMERARA U-1-C-F (34)

IN THE HIGH COURT OF THE SUPREME COURT OF THE JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN DATED 8/9/77

In the matter of JOHN VICTOR STOEN an infant

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub jiciendum

- and -

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

SUPREME COURT REGISTRY GEORGETOWN

EX PARTE APPLICATION BY WAY OF AFFIDAVIT AND AFFIDAVIT OF ATTEMPTED SERVICE:

I JEFFREY ALLEN HAAS, of 3609 Sacramento Street, San Francisco, California, United States of America, being duly sworn make oath and say as follows:-

1. That in pursuance of the Order of Court made herein by His Honour, Mr. Justice Bishop on the 6th day of September, 1977 and in pursuance of the Writ of Habeas Corpus granted by virtue of the said order of Court, I chartered an aircraft to transport the marshal of the High Court for the purpose of effecting service of the said order of Court and Writ of Habeas Corpus.

2. That at approximately 4 p.m. on Tuesday the 6th day of September 1977, the Marshal of the Supreme Court and I arrived at the People's Temple Agricultural Mission, Kaituma, North West District.

3. That on arrival at the Mission, a lady who identified herself as the personal Secretary of Jim Jones told me that Mr Jim Jones was not at the Mission but that he was up the river. The said lady and another member of the Mission told the Marshal of the High

Court in my presence and hearing that Jim Jones was not at the Mission.

4. We waited and for about twenty minutes, during which time the said Marshal made several enquiries about the whereabouts of the said Jim Jones, but the answers he received were evasive. One of the answers which the personal secretary of Jim Jones gave to the Marshal was that the said Jim Hones had been away from the Mission for two/days immediately preceding Tuesday and she did not know at all where he was.

5. About twenty minutes after leaving the Mission I was introduced to two Immigration Officers of the Guyana Government at Kaituma. Both of these officers told me that they had been at the Mission earlier that day and that they had seen and talked with the said Jim Hones during the course of certain investigations which they were carrying out.

6. The said Immigration Officers told me that they had experienced great difficulty in gaining access to and getting to speak with or see the said Jim Jones.

7. That in the premises I fear that it will not be possible for personal service of the said order of Court and Writ of Habeas Corpus to be effected in the normal manner by a Marshal of the Supreme Court.

8. That in the premises I respectfully apply to this Honourable Court for leave to effect service of the said Order of Court and Writ of Habeas Corpus, by nailing the said Order of Court and Writ of Habeas Corpus in a prominent place at the Mission of the People's Temple Agricultural Mission, Kaituma, North West District, and/or in other appropriate manner.

Sworn to at Georgetown, Demerara,
This 8th day of September, 1977.

Before Me,

A COMMISSIONER OF OATHS

1977 No. 2584 DEMERARA U-1-C-1(36)

IN THE HIGH COURT OF THE SUPREME COURT
OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN
An infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and trhough her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus ad sub jiciendum,

- and -

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

EX PARTE APPLICATION BY WAY OF AFFIDAVIT AND AFFIDAVIT OF ATTEMPTED SERVICE:

1977

Fee 3F 142246

Fee Filing $7.00

B. 9.77

C.A.F. HUGHES, Esq,
BARRISTER-AT-LAW.

U-1-C-1(37)

1977 No. 2584 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS for a Writ of Habeas Corpus and Sub juciendum.

- and -

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

BEFORE JUSTICE A.F.R. BISHOP (IN CHAMBERS).

DATED THE 10TH DAY OF SEPTEMBER, 1977.

ENTERED THE 14th DAY OF SEPTEMBER, 1977.

UPON this application coming on for further consideration on this day AND UPON READING the affidavit of JEFFREY ALLEN HAAS dated 8th September, 1977 and the order dated 8th September 1977 made therein AND UPON HEARING Counsel for the applicant there being no appearance of or on behalf of the Respondent IT IS ORDERED that a Bench Warrant be issued ~~for the arrest~~ of the infant JOHN VICTOR STOEN now in the custody of the Respondent and that the said child be made a ward of the Court and that leave is hereby granted to serve proceedings for contempt of Court on JIM JONES and that in the event that personal service of such proceedings not being effected such proceedings shall be served by affixing three certified copies of the said Order of Court Writ of Habeas Corpus and copy of this Order to three different places on the gate of/or other building constituting the People's Temple Agricultural Mission at Kaituma North West District and that a fourth copy

/...2

THE SUPREME COURT OF JUDICATURE OF GUYANA

U-1-C-1 (38)

be served on the Personal Secretary or a member of staff within the said compound holding himself or herself out as a servant or agent of the said JIM JONES AND IT IS FURTHER ORDERED that the costs of these proceedings up to the present time fixed in the sum of $1,250.00 (One thousand two hundred and fifty dollars) be paid by the Respondent JIM JONES to the applicant.

SUPREME COURT OF

BY THE COURT

DEPUTY REGISTRAR (Ag.)

U-1-C-1(39)

1977 No. DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS for a Writ of Habeas Corpus and Sub jiciendum.

- and -

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

SUPREME COURT REGISTRY GEORGETOWN 16/9/77

AFFIDAVIT OF SERVICE:

I WILLIAM BLACKMAN of The Law Court, being duly sworn make oath and day as follows:-

1. That I am a Marshal of the Supreme Court of Guyana.

2. That on the 9th day of September, 1977 I duly effected service of the Order of Court herein dated the 6th day of September, 1977, the Writ of Habeas Corpus issued herein on the 6th day of September 1977 and a copy of an Order of Court herein dated the 8th day of September 1977 by affixing three certified copies of the said Orders of Court and Writ of Habeas Corpus on three buildings constituting the People's Temple Agricultural Mission at Kaituma North West District and also by delivering a fourth copy of the said Orders of Court and Writ of Habeas Corpus to Mrs. Touchette.

3. The said Mrs. Touchette was the person who claimed to be in charged of the People's Temple Agricultural Mission at Kaituma in the absence of the said Jim Jones. At the time of delivering of the fourth copy of the aforesaid documents, the said Mrs. Touchette was within the compound of the People's Temple Agricultural Mission at Kaituma, North West District.

Sworn to at Georgetown, Demerara, William Blackman

This 10th day of September, 1977.

Before Me,

A COMMISSIONER OF OATHS.

GUYANA REVENUE

U-1-C-1(40)

977 No. 2584 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorny JEFFREY A. HAAS for a Writ of Habeas Corpus and Sub jiciendum.

- and -

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

AFFIDAVIT OF SERVICE

B24 3F 143332

Recd $1.00

16/7/77

DABI DIAL and/or H.B. FRASER,
Solicitor to Applicant.

U-1-C-1(41)

1977 No. 2584 DEMERARA

D240 D

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS for a Writ of Habeas Corpus and Sub Juciendum.

- and -

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

REGISTRY
GEORGETOWN
FILED 16/9/77

NOTICE OF MOTION:

TAKE NOTICE that this Honourable Court will be moved on the 13th day of September, 1977 at the hour of 9.00 o'clock in the forenoon before the Honourable Mr. Justice Bishop by Mr. Clarence A.F. Hughes, of Counsel, on behalf of the applicant for the following orders:-

(a) That Jim Jones of the People's Temple Agricultural Mission, Port Kaituma, North West District, do stand committed for his contempt of this Court in failing to obey an Order of this Honourable Court made on the 6th day of September, 1977 by the Honourable Mr. Justice Bishop whereby the said Jim Jones was ordered by a Writ of Habeas Corpus issued out of this Honourable Court to produce the body of the infant John Victor Stoen before the Honourable Mr. Justice Bishop in Chambers on Thursday the 8th day of September, 1977 at the hour of 9.00 o'clock in the forenoon and the return date of which said Writ was extended to Saturday the 10th day of September, 1977 at 9.00 o'clock in the forenoon.

(b) That the applicant may be at liberty to issue a writ or writs of attachment against the said Jim Jones for his said contempt.

(c) That the said Jim Jones pay to the applicant his costs of and incidental to this application and to the Order to be made thereon and of the issue and execution of such writs of attachment.

(d) Such further or other order as the Court shall seem proper.

AND FURTHER TAKE NOTICE that the applicant intends to read and use in support of this application the affidavit of William Blackman filed herein a copy of which affidavit is intended to be served together with this Notice of Motion.

Georgetown, Demerara,
Dated the 16th day of September, 1977

Solicitor to Applicant.

TO: JIM JONES,
People's Temple Agricultural Mission,
Kaituma,
North West District.

Service on the said Jim Jones, is to be effected in accordance with the Order of the Honourable Mr. Justice Bishop dated the 10th day of September, 1977.

1977 No. 2584 DEMERARA (43)

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub juciendum.

- and -

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

NOTICE OF MOTION:

1977

Rec 3F143332

Barrister at Law
As Solicitor to Applicant.

u-1-c-1 (44)
SUPREME COURT REGISTRY GEORGETOWN
DATED 20/9/77

1977. No. 34 - DEMERARA.

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION.

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and sub juciendum,

- and -

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

SUMMONS.

LET ALL PARTIES concerned attend the Judge in Chambers at the Law Courts at Georgetown, on ~~Tuesday~~ FRIDAY the 23rd 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 Stoen 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

.../2

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

AND thecosts of this application may costs in the action.

M.A.A.M.
Solicitor for Applicant.

DATED this 20th day of September, 1977.

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

To:- The Plaintiff

- and -

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

U-1-C-1 (46)

1977. No. 2584 - DEMERARA.

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE.

CIVIL JURISDICTION.

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN, by and through her lawful attorney JEFFREY A. HAAS, for a writ of Habeas Corpus and sub juciendum,

- and -

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

S U M M O N S.

1977
Re No. 3F 158706
Fee Filing $11.00
20/9/77

M.A.A. McDOOM

Solicitor for the Applicant.

U-1-C-1(47)

1977 No. 2504 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN DATED 20/9/77

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and sub juciendum,

- and -

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

AFFIDAVIT IN SUPPORT OF SUMMONS:

I, Joyce Touchette, of Jonestown, Port Kaituma, North West District, Guyana, being duly sworn make oath and say as follows:-

1. I wish to be joined as a Respondent/Defendant in the above cause or matter as I am a person directly interested and concerned in the said cause and am affected and will be affected by all Orders made ex parte and otherwise and in particular the Orders made by the Honourable Mr. Justice A.F.R. Bishop dated 6th September, 1977; 8th September, 1977; and 10th September, 1977; and I respectfully ask that I be added as a Respondent/Defendant.

2. I am a Member of the Organisation called the Peoples Temple of the Disciples of Christ, who are presently engaged in large scale farming in the North West Region of Guyana. I know the Reverend Jim Jones who is the pastor in charge of the Organisation and I am one of his secretaries.

3. The Plaintiff Grace Stoen is well known to me and was a Member of the Peoples Temple for seven (7) years, that is to say, between 1970 and 1976. I have read her affidavit sworn on the 18th August, 1977, in connection with her matrimonial proceedings in California, United States of America. This affidavit is not in respect of these habeas corpus proceedings in Guyana. A copy of the habeas corpus writ was served on me on the 9th September, 1977, and this included an Order of Court dated 8th September, 1977. The Plaintiff made a number of completely wicked and untrue statements in the said affidavit which of my own knowledge I know to be false. These include the allegations of beating of members and the alleged twisted moral code of the Reverend Jim Jones.

/2...

4. Grace Stoen the Plaintiff after several years as a member of the Peoples Temple gave to me a Notarised Parental Consent and Power of Attorney dated 9th March, 1976, in which she, the Plaintiff Grace Stoen and her husband Timothy Stoen consented for John Stoen who was born on January 25th, 1972, to be taken to Guyana to live and be cared for there under my guardianship or custody. In the same document she appointed the said Jim Jones and others as her Attorney, with the right to the care, custody, supervision and control of the said John Stoen anywhere throughout the world. A copy of the said document is hereto annexed and marked 'A'. The Plaintiff was, in my opinion, ill-suited to take care of the said child and voluntarily both parents (Stoen) entered into this Deed.

5. The said minor John Stoen has been in Guyana on and off for the past three (3) years and during this period he has been receiving tuition from trained teachers and at five (5) years of age can read and write. He has often travelled in the interior of Guyana with the Reverend Jim Jones; John Stoen is in excellent health and is happy living in Jonestown.

6. The Plaintiff Grace Stoen herself came to Guyana in December, 1974 bringing with her John Stoen. She liked the conditions which existed at Jonestown and signed the necessary Preliminary Immigration Papers to live in Guyana. A copy of the document application signed by her and marked 'B' is attached hereto. She confirmed that she wished to have John brought up in Guyana and the minor John Stoen has been in Guyana from October, 1976 to the present time without the Plaintiff contacting me or, to the best of my knowledge, John Stoen.

7. At the present time the Reverend Jim Jones, John Stoen, and many members of the Peoples Temple are in the interior of Guyana where Reverend Jim Jones is locating new lands for development. The Peoples Temple in Guyana comprise many hundreds of persons of all races with skills and expertise who are converting the Kaituma area into a growing township and are taking care of the public health and general health of the community in that region, supplying and producing food for the community there.

8. I am advised by Counsel and verily believe that all of the Orders made by His Honour Justice Bishop, and in particular the Orders of 6th September, 8th September, and 10th September are void and/or are a nullity and are of no effect and I respectfully ask the Court that I be joined as a Respondent/Defendant and that these said Orders be revoked and/or declared null and void

/3...

and/or be set aside in that:-

(a) The Writ of Habeas Corpus which must be served personally was never directed to be served personally and has not in fact been served on Reverend Jim Jones, and consequently all further Orders are of no effect. There is no provision in law for substituted service in cases such as the instant case;

(b) The Plaintiff has sworn to no affidavit in connection with this habeas corpus application. The only affidavit annexed was in connection with her matrimonial proceedings in the United States of America and ought not to have been admitted in these proceedings and/or have no probative value in these proceedings. Further, if the affidavit were admitted, it does not disclose as it ought to have done, vital and material facts as set out in Exhibits 'A' and 'B' and that the minor John Stoen has been in Guyana for the past three (3) years and has been living in Guyana continuously for the past twelve (12) months;

(c) One Jeffrey Allen Haas, an alleged Attorney, has not established and/or provided the requisite proof that he is an Attorney and/or that he is an authorised Attorney for Grace Stoen in this cause and/or that Grace Stoen has authorised him to receive John Stoen. No authority is attached and there is no proof in law that he was authorised as he claimed;

(d) From the Exhibits filed by Jeffrey Allen Haas, there purports to be an Order from the Courts of the United States of America compelling the Reverend Jim Jones to take John Stoen to the Courts in California. This is in conflict with Haas' request that the child be handed to him in Guyana before the 6th October. There is no verification of the alleged Order or no proof that such an Order was properly made or at all;

(e) The Plaintiff should not have obtained the aforesaid Orders, all of which were obtained ex parte without any service on Reverend Jim Jones, and these Orders including the Order awarding $1,250.00 (one thousand two hundred and fifty dollars) costs against Reverend Jim Jones, a person who was not served, and all the said Orders ought to be recalled and/or revoked

/4...

U-1-C-160

and/or deemed null and void and/or set aside, as they are all a nullity;

(f) 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 Stoen a Ward of Court and taking him into custody, and/or the grant of leave to commence Contempt proceedings and the Orders in connection therewith against Reverend Jim Jones, 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.

9. The proceedings by way of writ of habeas corpus in which Reverend Jim Jones is not even named as a Respondent/Defendant are bad for want of lack of jurisdiction, of the High Court of the Supreme Court of Guyana, inasmuch as inter alia the parties are American citizens and there are proceedings in the Courts of the United States of America which are pending and alleged Orders which have been made including an Order made for the appearance of Reverend Jim Jones and John Stoen in the Courts of California on the 6th October, 1977.

10. In the premises it is not competent for any Court in Guyana to exercise its jurisdiction and to make such Orders.

11. I authorise Mr. Mohammed Ayube Ally McDoom of McDoom & Company, Legal Practitioners of Harcourt Hall, Croal Street, Georgetown, to be and to act as my Solicitor in this matter.

Joyce Tinchitto

Sworn to at Georgetown, Demerara,
this 19th day of September, 1977
before me,

THEON GURRICK
Commissioner Of Oaths To Affidavits

A Commissioner of Oaths to Affidavits

THEON GURRICK
Commissioner of Oaths to Affidavits
GUYANA REVENUE
19 SEP 1977

U-1-C-11 (51)

1977 No. 2584 DEMERARA.

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN, an infant;

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS for a Writ of Habeas Corpus and sub juciendum.

- and -

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

AFFIDAVIT IN SUPPORT OF SUMMONS

1977 158706
Rec'd 3F 44
J.S. Jeffery $1.00
20/9/77

M. A. A. MCDOOM

Solicitor for the Applicant.

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. Stoen
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).

U-1-C-1 (53)

This is the Document Marked ... B
Referred to in the foregoing Affidavit by
... Sworn to on the ... day of
14.4.1977
T.A.G. Com. of Oaths.

S.3/4/4

* Information to be supplied by persons desirous 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 N/A
9. Names and dates of birth of dependent children N/A
10. Schools and other educational institutions attended and periods of attendence 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

U-1-C-1 (54)

This is the Document Marked "A" referred to in the foregoing Affidavit of Joyce Touchette sworn to on the 19 day of March 1977
E.A.G. Comm. of Oaths

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~~ JAN 25 1972

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 attorney, 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 O Stoen

Wkr

U-1-C-1 (55)

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 acknowledged to me that they executed the same.

WITNESS MY HAND AND OFFICIAL SEAL.

James R Randolph

Official Seal
James R. Randolph
Notary Public - Calif.
Principal Office in
Mendocino County
My commission expires Oct. 7, 1978

84-4236-2018

U-1-C-1 (56)

1977. No. 2584 - DEMERARA.

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE.

CIVIL JURISDICTION.

In the matter of JOHN VICTOR STOEN, an infant,

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY ALLEN HAAS for a Writ of Habeas Corpus and sub juciendum.

- and -

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

AFFIDAVIT IN SUPPORT OF SUMMONS.

M.AA. MC DOOM

Solicitor for the Applicant.

1977 No. 2548 DEMERARA

U-1-C-(57)

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN an infant

- and -

In the matter of an application by LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus ad Subjiciendum

- and -

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

AUTHORITY TO SOLICITOR:

1977
(No. 3[illegible])
Fee Filing $1.00

16/11/77

H.B. FRASER and/or Dabi Dial
Solicitor to Applicant.

197 No. DEMERARA U-1-C-1 (58)

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN

In the matter of JOHN VICTOR STOEN and infant.

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attoreny JEFFREY A. HAAS, for a Writ of Habeas Corpus ad Sub jiciendum

- and -

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

AUTHORITY TO SOLICITOR:

I GRACE LUCY STOEN, of 3609 Sacramento Street, San Francisco, California, United States of America, do hereby authorise Mr. Henry Britton Fraser and/or Dabi Dial, Solicitor to act as my Solicitor in the above cause and to do all acts and things necessary in connection therewith and to give good and valid receipts therefor on my behalf. The address for service and place of business of my said Solicitor is at the office of Messrs. Hughes, Fields & Stoby, Legal Practitioners, 62 Hadfield and Cross Streets, Georgetown, Demerara, Guyana.

x Grace L. Stoen

Dated the 30th day of November, 1977.

U-1-C-1 (59)

L[illegible] PR[illegible]ONERS
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.M.
BARRISTER-AT-LAW

DIAL 65815

"WHITEHALL"
N ½ LOT 1 CROAL STREET
(P.O. BOX 163),
GEORGETOWN,
GUYANA,
SOUTH AMERICA.

24th November, 1977

His Honour,
Mr. Justice Bishop,
Supreme Court,
Georgetown.

Dear Judge,

I understand that the Habeas Corpus proceedings and our application on behalf of Touchette is now fixed for the 10th December, when a fixture will be made. I do ask please that the further hearing continues on 10th December or an earlier date be fixed to obtain a hearing fixture.

As I shall be away for an extended period abroad, I ask, Sir, that this matter may be concluded at your earliest convenience please.

Yours respectfully,

Lionel Luckhoo

Lionel Luckhoo

c.c. Mr. Clarence Hughes,
Barrister-at-Law.

U-1-C-1(60)

26th November, 77.

Dear Sir Lionel,

Re: Habeas Corpus proceedings.

I acknowledge receipt of your letter dated 24th November, 1977 but regret to state that it will not be possible for me to adjust my list to conform with your proposal: there are several matters of similar importance already fixed for hearing.

Yours sincerely,

Received this day the letter dated 26th ult.
28 November, 1977

I Dyal

U-1-C-1(61)

1977 No.2584 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

In the matter of JOHN VICTOR STOEN an infant

- and -

In the matter of an application by GRACE LUCY STOEN by and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus and Sub juciendum

- and -

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

AFFIDAVIT IN ANSWER:

1977

CNO - 3F242

for filing $1.00

6/12/77

H.B. FRASER and/or DABI DIAL
Solicitor to Applicant.

U-1-C-1 (62)

1977 No. 2304 DEMERARA

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN DATED

In the matter of JOHN VICTOR STOEN an infant

- and -

In the matter of an application by GRACE LUCY STOEN By and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus ad Sub juciendum

- and -

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

AFFIDAVIT IN ANSWER:

I GRACE LUCY STOEN of 3609 Sacramento Street, San Francisco, California, United States of America, being duly sworn make oath and say as follows:-

1. That I am the applicant herein.

2. That I duly authorised Jeffrey Allen Haas, Attorney-At-Law, to appear on my behalf in the abovementioned matter and I also specifically and expressly authorised him to swear to all the affidavits sworn to herein on my behalf, and to seek and obtain all the orders sought and obtained herein on my behalf.

3. That I hereby specifically and expressly ratify and confirm all acts and things done by the said Jeffrey Haas in the matter herein. The said Jeffrey Haas was at all times acting as my agent herein with my full knowledge and authority to do and perform all the acts which he has done and performed herein and to seek and obtain all the orders which he has sought and all other orders necessary for and incidental to the proceedings herein, including the power to receive and retain physical control and custody of my infant son John Victor Stoen.

4. That I am the mother of the infant John Victor Stoen born of my body on the 25th day of January 1972 as appears from a copy of the Certificate of Live Birth attached to the affidavit of Jeffrey

U-1-C+1 (63)

10. The longer I remained in the Temple, the more disturbed I became at the discrepancies between the stated beliefs of the Temple and the internal workings. The only reason that I remained in the Temple for so long was that Jim Jones convinced me as well as other Temple members that the Peoples' Temple was the only progressive organization in the United States that was working toward socialistic and egalitarian goals. Members of the Temple were taught that Jim Jones was the reincarnation of Buddha, Jesus Christ and Lenin, and that membership in the Peoples' Temple was the only way towards justice on earth and salvation in the hereafter. The Temple cooperated with progressive movements in hopes of recruiting their memberships.

11. Some examples of what I believed to be wrong with the Peoples' Temple are as follows:

(a) The membership of many older and not well-educated persons was recruited by fear and fraud. Older black persons were taught that a facist overthrow of the United States government was imminent and that they would be gassed like Jews under Hitler. If they signed their names and pensions over to the Temple, Jim Jones would save them from concentration camps.

(b) Elderly persons who feared cancer or other terminal illness were recruited through the use of staged "miracle" cures in which "cancers" (in reality a chicken's innards) were shown to pass from members of the audience (in reality Temple members acting under the instructions of Jim Jones). The staging of phony miracles was justified as a means toward the end of advancing the ultimate greater good.

(c) A common method of discipline within the Peoples' Temple is the beating of members before the assembled membership. Microphones are placed near the mouth of the person beaten so that the intensity of their screams will not be lost on the audience. Children are not excluded from watching the public beatings. In fact, they are encouraged and sometimes required to watch them.

While I was a member of the Temple, JOHN and myself were present at many public beatings. On one occasion, a girl of seven was beaten well beyond the point at which she began to scream. On

1977 N 34 E ARA

U-1-C-1 (64)

IN THE HIGH COURT OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN

DATED

In the matter of JOHN VICTOR STOEN an infant

- and -

In the matter of an application by GRACE LUCY STOEN By and through her lawful attorney JEFFREY A. HAAS; for a Writ of Habeas Corpus ad Sub juciendum

- and -

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

AFFIDAVIT IN ANSWER:

I GRACE LUCY STOEN of 3609 Sacramento Street, San Francisco, California, United States of America, being duly sworn make oath and say as follows:-

1. That I am the applicant herein.

2. That I duly authorised Jeffrey Allen Haas, Attorney-At-Law, to appear on my behalf in the abovementioned matter and I also specifically and expressly authorised him to swear to all the affidavits sworn to herein on my behalf, and to seek and obtain all the orders sought and obtained herein on my behalf.

3. That I hereby specifically and expressly ratify and confirm all acts and things done by the said Jeffrey Haas in the matter herein. The said Jeffrey Haas was at all times acting as my agent herein with my full knowledge and authority to do and perform all the acts which he has done and performed herein and to seek and obtain all the orders which he has sought and all other orders necessary for and incidental to the proceedings herein, including the power to receive and retain physical control and custody of my infant son John Victor Stoen.

4. That I am the mother of the infant John Victor Stoen born of my body on the 25th day of January 1972 as appears from a copy of the Certificate of Live Birth attached to the affidavit of Jeffrey

Haas sworn to on the 5th day of September, 1977 and marked "B".

5. That on the 23rd February, 1977, a Petition for dissolution of the marriage between Timothy O. Stoen and me the deponent herein was filed on my behalf in the Superior Court in and for the County of San Francisco. In the said petition I claimed custody of the infant John Victor Stoen.

6. That on the 26th day of August, 1977, the Superior Court granted legal custody of the said John Victor Stoen to me.

7. I am a former member of the Peoples' Temple. I joined the organization shortly after marriage to TIMOTHY O. STOEN. At the time of my marriage, I was nineteen (19) years old, impressionable, and looked to my husband, who was twelve (12) years older, for guidance. He was a member of the Temple. I soon became a member also. The organisation's professed ideals of social justice, racial equality and concern for the economically disadvantaged held great appeal for both of us.

8. Because of my commitment to professed ideals of the Temple, I worked very hard. I was eventually promoted to Chief Counselor as well as bookkeeper. I still held both positions when I left the Temple in July, 1976.

9. I worked in close association with Jim Jones. His behaviour was frequently erratic. Jim 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 assassination, 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 behaviour 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.

another occasion, a girl of eleven was straddled spread-eagle and beaten seventy-five to one hundred times. On still another occasion, a young woman was beaten until both of her eyes were swollen shut.

The above is by no means an exhaustive list of public beatings which took place during my time in the Temple. The majority of the members of the Peoples' Temple were "brought up" before the membership for punishment at some time. Not all of the beatings caused serious injuries. Some merely served to degrade a selected member because of an alleged wrong. Members who did not say "Thank you, Father" to Jim Jones at the conclusion of a punishment directed by him were beaten more.

12. 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 members 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 affectionate relationship.

13. That conditions within the Temple became so appaling and unbearable that I had to flee therefrom during the month of July, 1976. That I was not able to take my infant son John Victor Stoen with me because I feared physical harm would have been inflicted on both of us.

14. That since leaving the said Peoples' Temple, I made numerous attempts to secure the return of my son John Victor Stoen but without success.

15. That during the month of September 1976, the said Jim Jones told me that he would kill both my son John Victor Stoen and me if I attempted to take away John from the Temple.

No. [illegible] DEMERARA U-1-C-1 (67)

IN THE HIGH [illegible] OF THE SUPREME COURT OF JUDICATURE

CIVIL JURISDICTION

SUPREME COURT REGISTRY GEORGETOWN DATED

In the matter of JOHN VICTOR STOEN an infant

- and -

In the matter of an application by GRACE LUCY STOEN By and through her lawful attorney JEFFREY A. HAAS, for a Writ of Habeas Corpus ad Subjuciendum

- and -

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

AFFIDAVIT IN AN [illegible]

I GRACE LU[illegible]N of 3609 Sacramento Street, San Francisco, California, Uni[illegible]tes of America, being duly sworn make oath and say as follow[illegible]

1. That I a[illegible]he applicant herein.

2. That I dul[illegible] authorised Jeffrey Allen Haas, Attorney-At-Law, to appear on my behalf in the abovementioned matter and I also specifically and expressly authorised him to swear to all the affidavits sworn to herein on my behalf, and to seek and obtain all the orders sought and obtained herein on my behalf.

3. That I hereby specifically and expressly ratify and confirm all acts and things done by the said Jeffrey Haas in the matter herein. The said Jeffrey Haas was at all times acting as my agent herein with my full knowledge and authority to do and perform all the acts which he has done and performed herein and to seek and obtain all the orders which he has sought and all other orders necessary for and incidental to the proceedings herein, including the power to receive and retain physical control and custody of my infant son John Victor Stoen.

4. That I am the mother of the infant John Victor Stoen born of my body on the 25th day of January 1972 as appears from a copy of the Certificate of Live Birth attached to the affidavit of Jeffrey

Haas sworn to on the 5th day of September, 1977 and marked "B".

5. That on the 23rd February, 1977, a Petition for dissolution of the marriage between Timothy O. Stoen and me the deponent herein was filed on my behalf in the Superior Court in and for the County of San Francisco. In the said petition I claimed custody of the infant John Victor Stoen.

6. That on the 26th day of August, 1977, the Superior Court granted legal custody of the said John Victor Stoen to me.

7. I am a former member of the Peoples' Temple. I joined the organization shortly after marriage to TIMOTHY O. STOEN. At the time of my marriage, I was nineteen (19) years old, impressionable, and looked to my husband, who was twelve (12) years older, for guidance. He was a member of the Temple. I soon became a member also. The organisation's professed ideals of social justice, racial equality and concern for the economically disadvantaged had great appeal for both of us.

8. Because of my commitment to professed ideals of the Temple, I worked very hard. I was eventually promoted to Chief Counselor as well as bookkeeper. I still held both positions when I left the Temple in July, [illegible].

9. I worked in close association with Jim Jones. His behaviour was frequently erratic. Jim 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 assassination, 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 behaviour 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.

10. The longer I remained in the Temple, the more disturbed I became at the discrepancies between the stated beliefs of the Temple and the internal workings. The only reason that I remained in the Temple for so long was that Jim Jones convinced me as well as other Temple members that the Peoples' Temple was the only progressive organization in the United States that was working toward socialistic and egalitarian goals. Members of the Temple were taught that Jim Jones was the reincarnation of Buddha, Jesus Christ and Lenin, and that membership in the Peoples' Temple was the only way towards justice on earth and salvation in the hereafter. The Temple cooperated with progressive movements in hopes of recruiting their memberships.

11. Some examples of what I believed to be wrong with the Peoples' Temple are as follows:

(a) The membership of many older and not well-educated persons was recruited by fear and fraud. Older black persons were taught that a facist overthrow of the United States government was imminent and that they would be gassed like Jews under Hitler. If they signed their names and pensions over to the Temple, Jim Jones would save them from concentration camps.

(b) Elderly persons who feared cancer or other terminal illness were recruited through the use of staged "miracle" cures in which "cancers" (in reality a chicken's innards) were shown to pass from members of the audience (in reality Temple members acting under the instructions of Jim Jones). The staging of phony miracles was justified as a means toward the end of advancing the ultimate greater good.

(c) A common method of discipline within the Peoples' Temple is the beating of members before the assembled membership. Microphones are placed near the mouth of the person beaten so that the intensity of their screams will not be lost on the audience. Children are not excluded from watching the public beatings. In fact, they are encouraged and sometimes required to watch them.

While I was a member of the Temple, JOHN and myself were present at many public beatings. On one occasion, a girl of seven was beaten well beyond the point at which she began to scream. On

U-1-E-1(70)

another occasion, a girl of eleven was straddled spread-eagle and beatn seventy-five to one hundred times. On still another occasion, a young woman was beaten until both of her eyes were swollen shut.

The above is by no means an exhaustive list of public beatings which took place during my time in the Temple. The majority of the members of the Peoples' Temple were "brought up" before the membership for punishment at some time. Not all of the beatings caused serious injuries. Some merely served to degrade a selected member because of an alleged wrong. Members who did not say "Thank you, Father" to Jim Jones at the conclusion of a punishment directed by him were beaten more.

12. 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 members 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 affectionate relationship.

13. That conditions within the Temple became so appaling and unbearable that I had to flee therefrom during the month of July, 1976. That I was not able to take my infant son John Victor Stoen with me because I feared physical harm would have been inflicted on both of us.

14. That since leaving the said Peoples' Temple, I made numerous attempts to secure the return of my son John Victor Stoen but without success.

15. That during the month of September 1976, the said Jim Jones told me that he would kill both my son John Victor Stoen and me if I attempted to take away John from the Temple.

16. That I deny that my son John Victor Stoen has been in Guyana on and off for the past three years. On or about the 2nd day of July 1977, I was informed by my husband Timothy O. Stoen that my son John Victor Stoen was in Guyana.

17. That I am informed that Jim Jones and other members of the Peoples' Temple claim custody of my son on the basis of a notarized parental consent executed by me before I left the church. At the time I signed the form it was treated as a very routine matter. It was explained to me that the form was necessary in the event that JOHN and I travelled separately or that he needed emergency care while I was away on church business. There was no suggestion that I was being requested to sign the form because I was an unfit mother. On the contrary, at the time I signed the form I was head counselor a position of considerable responsibility within the church.

18. In September, 1976 I personally notified Jim Jones that I wished JOHN'S return. My request was denied. Therefore, when JOHN was removed from California, Jim Jones was aware that his removal was contrary to my wishes.

19. That on the 30th day of August 1977, I executed before a Notary Public, a Revocation of Previous Powers of Attorney And Authorizations Re Guardianship of the Minor Child John Victor Stoen. Hereto attached and marked "A" is the said Act of Revocation.

20. That by a registered letter dated the 14th day of October 1977, a copy of the said Act of Revocation was sent to Joyce Touchette. Hereto attached and marked "B" is a copy of the said letter written on my behalf by Mr. C.A.F. Hughes.

21. That my husband, Timothy O. Stoen, my son John Victor Stoen and I are all citizens of the United States of America. We have all been born in and have lived all of our lives, save for short periods, in the United States of America. Since my marriage my husband and I have lived all of our lives in California, United States of America and at the present time we both still live in California, United States of America. Neither my husband nor I have any intention of residing or living in Guyana.

U-1-C+1 (72)

22. That in the premises I respectfully submit that the issue as to custody of the said infant should be determined by the Courts of the State of California, and that the said Jim Jones and/or Joyce Touchette should be ordered to deliver up my said son to me.

Acknowledgment - General

STATE OF CALIFORNIA, } ss.
County of SAN FRANCISCO

On November 29, 1977, before me, LILLIAN MARIA PIOL, a Notary Public whose principal place of business is in the County of SAN FRANCISCO, State of California, personally appeared GRACE L. STOEN, known to me to be the person named in the within instrument, and whose name is subscribed thereto, and acknowledged to me that he executed the same.

LILLIAN MARIA PIOL
NOTARY PUBLIC-CALIFORNIA
CITY AND COUNTY OF
SAN FRANCISCO
My Commission Expires April 3, 1979

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

Lillian Maria Piol
LILLIAN MARIA PIOL, Notary Public

ATTORNEYS PRINTING SUPPLY, FORM NO. 6
REV. AUGUST 1, 1972

Ut-C-1- (73)

CERTIFICATE OF LIVE BIRTH

STATE OF CALIFORNIA—DEPARTMENT OF PUBLIC HEALTH

4900-170

STATE BIRTH 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 TRIPLET: SINGLE
3B. IF TWIN OR TRIPLET, THIS CHILD BORN 1ST, 2ND, 3RD?
4a. DATE OF BIRTH—MONTH, DAY, YEAR: JANUARY 25, 1972
4b. TIME: 1:16PM

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. IN THIS CITY CORPORATE LIMITS? 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 CORPORATE LIMITS? YES OR NO: NO
10c. RESIDENCE OF MOTHER—CITY OR TOWN: UKIAH
10D. RESIDENCE OF MOTHER—COUNTY: MENDOCINO
10E. RESIDENCE OF MOTHER—STATE: CALIFORNIA 95948

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 THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.
16A. PARENT OR OTHER INFORMANT—SIGNATURE (IF OTHER THAN PARENT, SPECIFY): Grace Lucy Stoen
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. PHYSICIAN (OR OTHER PERSON WHO ATTENDED THIS BIRTH) SIGNATURE—DEGREE OR TITLE: John S. Bolly MD
17B. DATE SIGNED BY PHYSICIAN OR OTHER ATTENDANT: 1-26-72
17c. ADDRESS: Santa Rosa, Ca.
17D. PHYSICIAN'S CERTIFICATE OR LICENSE NUMBER: A 19087

LOCAL REGISTRAR

18. REQUEST OMISSION FROM SOLICITATION LISTS
19. LOCAL REGISTRAR—SIGNATURE: Walter C. Brown M.D. M.P.H.
20. DATE RECEIVED FOR REGISTRATION BY LOCAL REGISTRAR: FEB 2 1972

MEDICAL AND HEALTH DATA

PREVIOUS DELIVERIES TO THIS MOTHER (DO NOT INCLUDE THIS CHILD): NONE
21A. HOW MANY OTHER CHILDREN ARE NOW LIVING? NONE
21B. HOW MANY OTHER CHILDREN WERE BORN ALIVE BUT ARE NOW DEAD? NONE
21C. HOW MANY FETUSES WERE BORN DEAD AFTER 20 WEEKS GESTATION? NONE
21D. DATE OF LAST LIVE BIRTH (ENTER MONTH, DAY, YEAR): NONE
21E. DATE OF LAST FETAL DEATH (ENTER MONTH, DAY, YEAR): NONE
22. DATE LAST NORMAL MENSES BEGAN (ENTER MONTH, DAY, YEAR): APRIL 10, 1971
23. MONTH OF PREGNANCY PRENATAL CARE BEGAN (1ST, 2ND, 3RD, ETC.—IF NONE, SO STATE): THIRD
24. WEIGHT AT BIRTH: 7 LBS. 8 OZS.
25. LENGTH AT BIRTH (CROWN-HEEL): 20 INCHES
26. COMPLICATIONS RELATED TO PREGNANCY (DESCRIBE OR IF NONE, SO STATE): None
27. COMPLICATIONS OF LABOR AND DELIVERY (DESCRIBE OR IF NONE, SO STATE): Occiput posterior - Mid forceps delivery
28. CESAREAN SECTION (ENTER YES OR NOT): NO
29. BIRTH INJURY TO CHILD (DESCRIBE OR IF NONE, SO STATE): None
30. CONGENITAL MALFORMATIONS OR ANOMALIES (DESCRIBE OR IF NONE, SO STATE): None
31. INFANT DEATH—(ENTER DATE OF DEATH)
32. OTHER DATA
REQUEST OMISSION FROM SOLICITATION

STATE REGISTRAR

A. B. C. D. E. F.

REV. 11-68 Form VS-10

The within Document is a correct copy of the record in this office.

ATTEST: AUG 19 1977

HERB SNYDER, JR.
County Recorder in and for the County of Contra Costa
By: [illegible]

Exhibit A

U-1-C #(74)

REVOCATION OF PREVIOUS POWERS OF ATTORNEY
AND AUTHORIZATIONS RE GUARDIANSHIP OF THE
MINOR CHILD JOHN VICTOR STOEN

I, GRACE L. STOEN, hereby declare the following under penalty of perjury:

I am the natural mother of John Victor Stoen, born January 25, 1972. Pursuant to an Order Re Child Custody issued by the Superior Court of the State of California and in the City and County of San Francisco, I have exclusive custody of my minor son, John Victor Stoen.

I hereby revoke any and all previous powers of attorney or other authorizations granting custody of my minor son, John Victor Stoen to any third party, including but not limited to a power of attorney authorizing Joyce Touchette to act as guardian of my son.

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

Executed at San Francisco, California on August 30, 1977.

Grace Stoen

GRACE STOEN

Acknowledgment - General

State of California } ss
County of San Francisco

On August 30, 1977 before me, the undersigned, a Notary Public for California, personally appeared Grace Stoen known to me (or proved to me on the oath of) to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same.

OFFICIAL SEAL
MARLENE JOHNSON
NOTARY PUBLIC - CALIFORNIA
CITY & COUNTY OF SAN FRANCISCO
My Commission Expires May 6, 1981

Marlene Johnson
Notary Public for California

ATTORNEY'S PRINTING SUPPLY, Form No. 5
CC (189 - REV 1973)

U-1-C-1(75)

O.File.
11.8.

MEMORANDUM

FROM: Registrar of the Supreme Court. TO: Mr. M.A.A. Mc Doom,
Solicitor.

Messrs. Luckhoo & Luckhoo,
Legal Practitioners.

Mr. O.A.F. Hughes,
Barrister-at-Law.

Re: Application [illegible] GRACE LUCY STORM (No. 2584/77).

TAKE NOTICE that the decision in the abovementioned matter will be delivered by [illegible] BISHOP on SATURDAY the 12th day of AUGUST, 1978, at 1[illegible] p.m.

Dated the [illegible]y of August, 1978.

for Registrar.