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- TOP SECRET
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- CONFIDENTIAL
- UNCLAS E F T O
- UNCLAS

Date 1/23/79

TO: DIRECTOR, FBI (89-4286)  
 FROM: *m/sac* SAC, SAN FRANCISCO (89-250) (P) (SQ. 10)  
 SUBJECT: RYMUR

ALL INFORMATION CONTAINED  
 HEREIN IS UNCLASSIFIED  
 DATE 11/20/92 BY 1048 DLM/mcm

Enclosed for FBIHQ is a copy of a suit filed on behalf of the United States Government against the People's Temple (PT) (u)

The suit alleges the 500 persons who died in Guyana expressly or impliedly contracted with the PT for the necessities of life and the incidents thereto, including proper burial. Because of the PT's failure, the U.S. Government performed acts with the intent to be paid therefor. The cost of these acts is \$4,298,000.00 and that is what the suit asks. (u)

Unrelated, today's news media carried a story indicating the family of Congressman LEO J. RYAN filed a \$5,000,000.00 suit against the PT. (u)

1 copy retained in 5096 as T  
1/31/79 DES/BAF

EX-121

REC-80

89-4286-1780

2 JAN 25 1979



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b7C

2 - Bureau (Encl. 1) ENCLOSURE  
 2 - San Francisco  
 LGL:jmr  
 (4)

Approved: \_\_\_\_\_ Transmitted \_\_\_\_\_ Per \_\_\_\_\_  
 (Number) (Time)

58 FEB 7 1979

ORIGINAL FILED

JAN 22 1979

CLERK, U. S. DIST. COURT  
SAN FRANCISCO

ALL INFORMATION CONTAINED  
HEREIN IS UNCLASSIFIED  
DATE 11/20/92 BY 1046 D/K/m/nda

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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA, **LC 79 0126**

Plaintiff,

v.

CIVIL ACTION NO.

16 PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST,  
17 a California corporation, a/k/a PEOPLES  
18 TEMPLE CHRISTIAN CHURCH, THE PEOPLES TEM-  
19 PLE OF THE DISCIPLES OF CHRIST CHURCH IN  
20 GUYANA, a Guyanese corporation; PEOPLES  
21 TEMPLE CHRISTIAN CHURCH COMPANY LIMITED,  
22 a Guyanese corporation; ASOCIACION RELI-  
23 GIOSA PRO SAN PEDRO, S.A., a Panamanian  
24 organization,

COMPLAINT

GOVERNMENT COLLECTION

Defendants.

22 1. Jurisdiction. Jurisdiction is based on 28 U.S.C. §1345  
23 because this action is commenced by the United States of America,  
24 plaintiff.

25 2. Defendant, Peoples Temple of the Disciples of Christ,  
26 a/k/a/ Peoples Temple Christian Church, is a California corpora-  
27 tion formed under Section 9000-9802 of the California Corpora-  
28 tion Code, with its principal place of business in San Francisco,  
29 California.

30 3. Defendant, the Peoples Temple Christian Church Company  
31 Limited, is a corporation organized pursuant to the laws of the  
32 nation of Guyana. On information and belief, at all relevant

ENCLOSURE 89-4286-1780

1 times the Peoples Temple Christian Church Company Limited was  
2 doing business in this District in its own name or and through  
3 its alter ego, the People Temple of the Disciples of Christ.

4 4. Defendant, Peoples Temple of the Disciples of Christ  
5 Church in Guyana, is a corporation organized pursuant to the  
6 laws of the nation of Guyana. On information and belief, the  
7 Peoples Temple of the Disciples of Christ Church in Guyana at  
8 all relevant times was doing business in this District in its  
9 own name or through its alter ego, the Peoples Temple of the  
10 Disciples of Christ.

11 5. Defendant, Asociacion Religiosa Pro San Pedro, S.A.,  
12 is an association or corporation organized pursuant to the laws  
13 of the Republic of Panama. On information and belief, this  
14 association or corporation was organized for the purpose of  
15 holding the assets of the Peoples Temple of the Disciples of  
16 Christ or its alter egos and it is an alter ego of the Peoples  
17 Temple of the Disciples of Christ doing business in this District.

18 6. On or about November 18, 1978, the defendant, Peoples  
19 Temple of the Disciples of Christ, acting for itself or through  
20 its agents or its alter egos, did negligently or through willful  
21 and wanton conduct fail to take steps to protect from wrongful  
22 injury or death over 900 persons in Jonestown, Guyana, leading  
23 to an emergency situation which was a threat to health, safety  
24 and decency. On information and belief, James Jones as the al-  
25 ter ego, chief officer and agent of the Peoples Temple of the  
26 Disciples of Christ and its alter egos did intentionally, neg-  
27 ligently or through willful and wanton conduct abet or cause  
28 the deaths.

29 7. The more than 900 persons referred to in paragraph 8  
30 above were members of the Peoples Temple of the Disciples of  
31 Christ community in Jonestown who expressly or impliedly con-  
32 tracted with the Peoples Temple Disciples of Christ or its

(u)

1 alter egos for the necessities of life and the incidents thereto  
2 including proper burial.

3 8. The defendant Peoples Temple of the Disciples of Christ  
4 or its alter egos failed to tend to the needs of its members in  
5 the emergency situation resulting from the deaths referred to  
6 above.

7 9. Among other things, the defendant Peoples Temple of the  
8 Disciples of Christ or its alter egos failed to protect or provide  
9 for the survivors of the events of November 18, 1978; it failed to  
10 search for and secure from harm the lives and property of its mem-  
11 bers; it failed to take reasonable steps to transport the bodies  
12 of its deceased members to a suitable place for burial or to the  
13 relatives of the deceased; it failed to provide for the burial of  
14 its members or to protect the deceased from indignities. (u)

15 10. The United States requested the government of Guyana to  
16 permit burial on its soil which request was denied. The Govern-  
17 ment of Guyana then requested the United States to remove the bod-  
18 ies from Guyana.

19 11. Because of the failure of the defendant Peoples Temple  
20 of the Disciples of Christ or its alter egos to perform its du-  
21 ties, including those described in paragraph 9 above, the United  
22 States of America, for reasons including public health, safety  
23 and decency, did perform such acts with the intent to be paid  
24 therefor.

25 12. The United States continues to perform such acts and  
26 is entitled to compensation therefor.

27 13. Thus far, the United States has incurred damages of  
28 \$4,298,000. The United States expects to accrue further damages.

29 14. On information and belief, each of the defendants in  
30 this action and James Jones disregarded the separate forms and  
31 corporate status of the defendants and each defendant and James  
32 Jones are the alter egos of each other.

1 WHEREFORE, the United States demands:

2 (1) Judgment against the defendants for the total amount  
3 of damages incurred by the United States in this matter; and

4 (2) Such other relief as is just and equitable.

5 Respectfully submitted,

6  
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8 Assistant Attorney General

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