

GARRY, DREYFUS, McTERNAN, BROTSKY,
HERNDON & PESONEN, INC.
1256 MARKET STREET AT CIVIC CENTER
SAN FRANCISCO, CALIFORNIA 94102
TEL: 964-3131

1 DECLARATION OF CAROL STAHL IN SUPPORT OF COMPLAINT FOR
2 TEMPORARY RESTRAINING ORDER, PRELIMINARY AND PERMANENT
3 INJUNCTIONS, AND DAMAGES

4 Carol Stahl declares:

5 1. I am president of plaintiff PEOPLES TEMPLE OF THE
6 DISCIPLES OF CHRIST (hereinafter "PEOPLES TEMPLE"), a nonprofit
7 corporation.

8 2. I have personal knowledge of the following facts and
9 am competent to testify as to the truth of these facts if called
10 as a witness.

11 3. Defendant TIMOTHY OLIVER STOEN served as legal
12 counsel for PEOPLES TEMPLE from 1970 until approximately July
13 of 1977. He represented plaintiff PEOPLES TEMPLE in various
14 litigation matters, drafted various legal documents for plaintiff
15 PEOPLES TEMPLE, drafted amendments to PEOPLES TEMPLE corporate
16 articles, drafted PEOPLES TEMPLE's corporate bylaws, wrote
17 numerous letters on behalf of plaintiff PEOPLES TEMPLE, and
18 negotiated numerous transactions, including real estate
19 transactions, on behalf of plaintiff PEOPLES TEMPLE, as its
20 attorney. As legal counsel he routinely gave legal advice
21 to the Board of Directors, officers and members of plaintiff
22 PEOPLES TEMPLE, including plaintiffs BROWN and McELVANE.

23 4. On June 5, 1978 I was personally served on behalf
24 of PEOPLES TEMPLE with a complaint for compensatory and punitive
25 damages, filed in the Superior Court of the State of California
26 in and for the County of Mendocino, Civil Action #39911.

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1 This complaint was filed by defendant STOEN on behalf of Steven
2 Katsaris and against, among others, plaintiff herein PEOPLES
3 TEMPLE. PEOPLES TEMPLE has already been forced to spend
4 considerable time, energy and funds in responding to this suit.
5 I am aware of at least two other suits filed by STOEN against ,
6 PEOPLES TEMPLE and the other plaintiffs in this action, though
7 none of the plaintiffs herein has yet been served with these
8 complaints. One of these complaints was filed on June 7, 1978
9 in the Superior Court in and for the County of Los Angeles,
10 Civil Action #24392. This complaint was filed by defendant STOEN
11 on behalf of Wade B. and Mabel M. Medlock against, among others,
12 plaintiffs herein PEOPLES TEMPLE and McELVANE. The other
13 complaint was filed on June 22, 1978 in the Superior Court
14 in and for the City and County of San Francisco, Civil Action
15 #739907. That complaint was filed by STOEN on behalf of James
16 Cobb, Jr. against, among others, plaintiffs herein PEOPLES
17 TEMPLE and BROWN. These complaints may be served upon the
18 plaintiffs herein, or any of them, any day. As soon as the
19 above-described complaints are served on plaintiffs, or any of
20 them, plaintiffs and each of them will be forced to expend more
21 time, energy and funds responding to these suits.

22 5. In drafting these complaints defendant utilized
23 and revealed confidential information obtained during the course
24 of his attorney-client relationship with plaintiffs and each of
25 them, without the consent of plaintiff PEOPLES TEMPLE or any other
26 plaintiff herein.

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1 6. The filing of each of the suits described in
2 Paragraph 4 supra generated a multitude of news stories adverse
3 to plaintiff PEOPLES TEMPLE and to the other plaintiffs herein.
4 These stories appeared in newspapers throughout California.
5 The adverse publicity generated by these complaints was
6 particularly adverse in the County of Mendocino, the location
7 of one of the actions. This publicity has caused irreparable
8 damage to the reputation of the PEOPLES TEMPLE and of the
9 other plaintiffs herein.

10 7. Defendant solicited the professional employment
11 within the course of which he filed the suits described in
12 Paragraph 4. He continues to solicit employment adverse to
13 the interests of his former clients, PEOPLES TEMPLE and the
14 other plaintiffs herein, for the purpose of harassing and
15 destroying these plaintiffs.

16 8. Defendant STOEN's solicitation of employment
17 adverse to his former clients, plaintiffs herein, and his
18 violation of the attorney-client privilege of these former
19 clients is a part of a personal vendetta of defendant STOEN
20 against the PEOPLES TEMPLE. He will continue this solicitation
21 and violation of the attorney-client privilege unless and until
22 he is restrained by court order from so doing.

23 9. The activities described in the preceding
24 paragraphs of this Declaration have caused, and will continue
25 to cause if not immediately restrained, irreparable injury
26 to the reputation of plaintiff PEOPLES TEMPLE and the other

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1 plaintiffs herein. Irreparable injury has also resulted,
2 and will continue to result on a daily basis, from defendant
3 STOEN's continued disclosure of confidential information
4 concerning plaintiff PEOPLES TEMPLE and the other plaintiffs
5 herein in the course of his solicitation of employment adverse
6 to plaintiffs herein and his prosecution of the suits
7 already filed.

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

10 This Declaration was executed in San Francisco,
11 California, on July __, 1978.

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14 *Carol Stahl.*
15 _____
16 CAROL STAHL
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Stoen reacts to Grapevine article

Ukiah weekly target of \$5 million lawsuit

By GEORGE HUNTER

Timothy Oliver "Tim" Stoen, former assistant district attorney for Mendocino County whose beliefs are closely linked to those of the Rev. Jim Jones, pastor of the Peoples Temple Church, is preparing to file a \$5 million lawsuit against the Mendocino Grapevine, a Ukiah weekly.

Stoen, who flew here last weekend from New York City to confer with Ukiah attorney Pat Finnegan, told the Daily Journal that he would also seek damages of some \$13 million from New West, a San Francisco bi-weekly magazine which has carried two "expose" articles relating to Peoples Temple and its pastor.

Stoen said that an article appearing in a recent issue of the Ukiah weekly had damaged his reputation. "I intend to practice law here in Ukiah and it is essential that I clear my name," Stoen said.

"I must show the world that a newspaper cannot wrongfully hurt innocent people without being brought to account."

Noting that he was prepared to do battle on all levels, Stoen said: "I'm a street fighter. People will come to appreciate that fact that I'm a street fighter."

"I feel like Alfred Dreyfus," Stoen said, referring to the French Army officer of the 19th century who was convicted by an Army court and imprisoned on Devil's Island for defending his religious beliefs.

"I'm experienced enough with our jury system to believe in it. I'll put my trust in the system," Stoen said.

Stoen reacted strongly to inferences that he was "afraid" of Rev. Jones. "I want to dispel that allegation," he said.

The former assistant district attorney also was sharply critical to charges that he had used his public office to spy for Jones. "I've always made known my esteem for Jim Jones," he said. "I have nothing to hide and no one can show a single instance where I ever used my public office to show favoritism toward the church.

Stoen charged that the reporting of New West magazine was irresponsible in that the magazine article quoted the Mendocino Grapevine verbatim. Stoen said he would prove the statements to be untrue and malicious in motivation and that the Grapevine violated the newspaper canon of ethics, giving Stoen no chance to reply to the accusations.

The demands for retraction and damages will be contained in a complaint filed here. The suit against New West magazine will be filed in San Francisco.

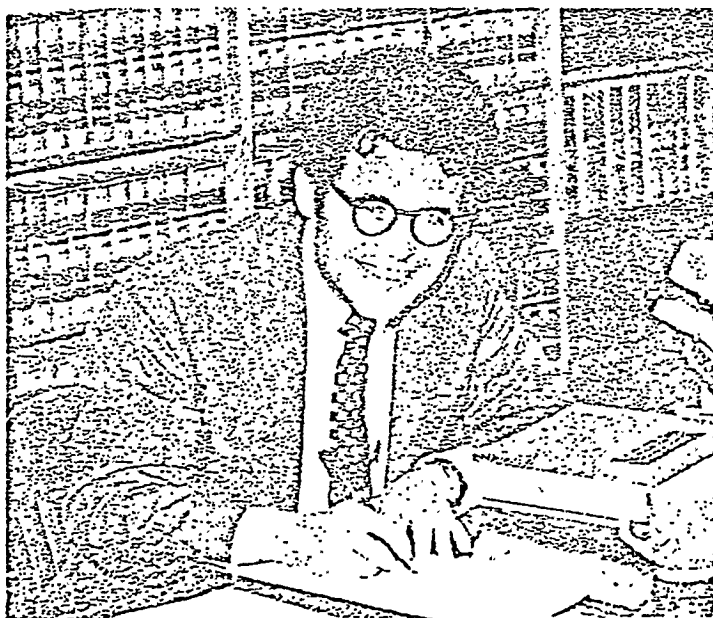
Stoen was "loaned" to San Francisco city and county in 1975 to prosecute voter fraud after a large-scale scandal surfaced. Out of 39 indictments returned by the Grand jury, 37 convictions were obtained. Stoen was then asked by San Francisco District Attorney Joseph Freitas to accept the post

of special prosecutor with a large staff of attorneys to fight organized crime and public corruption. Stoen accepted the post then resigned when he felt that he was needed in Guyana, a small South American country, to help Jones in establishing a communal-type center, Jonestown, for minorities and the underprivileged.

Stoen has established residence in Manhattan in order that he may be admitted to the New York State bar.

"Jones has helped me develop an empathy toward the persecuted," Stoen said. "I intend to develop a national law firm to help people who are prosecuted, on some pretext, for their religious beliefs. Stoen said he was worried about "creeping totalitarianism" that left no room for dissent.

Stoen hopes to attract idealistic young attorneys to his organization.



FORMER ASSISTANT DA TIM STOEN
"Dreyfus-like inquisition"

BB-31-6-93

EXHIBIT A

MENDOCINO GRAPVINO

AUGUST 25, 1977

The Weekly Newspaper of Mendocino County, California

NUMBER 166

20¢

Peoples Temple
Libel Threat

Peoples Temple Articles Bring Libel Suit Threat

By Vicki Allen

The recent disclosures about the Peoples Temple have resulted in the threat of a libel suit against New West Magazine and the Mendocino Grapvino.

Although no such lawsuit has been filed, a high official of the controversial church says it's coming.

Tim Stoen, former assistant district attorney of Mendocino County, appeared in Ukiah last weekend to consult with attorney Pat Finnegan.

In an interview with the Ukiah Daily Journal, Stoen announced his plans to seek \$13 million in damages against New West and \$6 million against the Grapvino.

Stoen then left town and could not be reached for comment by the Grapvino. Finnegan said he does not know when Stoen will return.

The Grapvino has not been ask-

ed for a retraction and has not received a list of the statements alleged to be libelous.

Articles about the Peoples Temple appeared in the July 21, July 29, Aug. 4 and Aug. 18 issues of the Grapvino.

After New West printed the conclusions of its extensive investigation into the practices of the church, news reports were also published in the San Francisco Examiner, the San Francisco Chronicle and the Press Democrat.

According to Finnegan, Stoen hasn't seen the articles in those publications.

"The articles in the Grapvino came to Tim's attention first," the attorney said.

"We had to start somewhere so we started in Ukiah."

"It's all speculation," said Pano Stephens, the attorney for the Grapvino, who pointed out no suit had been filed.

"Until we receive their claims, we cannot assess what the problem is and we cannot respond."

Once the Grapvino learns what is alleged to be defamatory, Stephens said, then a response will be prepared.

Coincidentally, the day after Stoen announced his legal plans, the San Francisco Examiner published a copyrighted story about a tape recording of Stoen which is being given to the California Attorney General.

According to the page one article, the San Francisco District Attorney's Office says it is turning over a tape of Stoen arranging a payment to an ex-member of the Peoples Temple who claims his name was forged on a property transfer document.

The San Francisco DA's office is investigating allegations that temple leaders took members and forced others to turn property

BB-31-10-94

over to the church.

Tim Refferman, who wrote the Examiner article with Nancy Dooley, said he was not aware Stoen was in the country and had no knowledge of the intended lawsuit.

Finnegan said he doesn't know when the suit will be filed.

The demand for a retraction will be as specific as we can make it," he said.

"Nobody is being sued yet."

Finnegan added, "My plans right now are to file a demand for a retraction."

He also said, "Anything I file will be filed on behalf of Tim Stoen. I'm concerned solely with articles that reflect adversely on Tim Stoen."

If a libel suit is brought against the Grapevine, it will be filed in Mendocino County, Finnegan said. A suit against New West would be filed in San Francisco.

According to the original New West article, 30 parcels of property in Mendocino County were deeded to the Peoples Temple from 1968.

That Aug. 1 copyrighted story contains statements from Grace Stoen, who claims her husband notarized questionable gifts of property to the church.

The magazine also says a 22-year-old Utah man, who took his own life in 1975, was convinced by Stoen to turn over \$10,000 to the church. The article quotes the man's mother.

Former temple members have also told reporters that Stoen appeared to be afraid of the Rev. Jim Jones.

The articles in New West, the Grapevine and other publications were based on interviews with former church members who told of Peoples Temple leaders staging phony cancer cures, lying to the congregation about contributions collected at services, beating members and pressuring them to donate property.

Life inside the temple was said to be "a mixture of Spartan regimentation, fear and self-imposed humiliation."

Rev. Jones started the unorthodox church in Redwood Valley with 100 members in 1965.

The membership reportedly climbed to 20,000 when bases were established in San Francisco and Los Angeles.

Stoen, the church's chief legal advisor, has been a member for several years.

He left his job in the Mendocino County DA's office in May, 1976 to become a special prosecutor for voter fraud in San Francisco County. He resigned from the San Francisco District Attorney's Office in April to join Rev. Jones in Guyana, South America.

Stoen's wife, Grace, who left him earlier this year, is now seeking custody of their five-year-old son.

"I intend to practice law here in Utah and it is essential that I clear my name," Stoen said in the Journal article by editor George Hunter.

He also said, "I'm a street fighter," and compared himself to French Army officer Alfred Dreyfus, who was sentenced to Devil's Island in the last century.

Although the article says Stoen plans to practice law in Utah, it also says he has established residence in New York because he intends to open a law firm to defend people who are prosecuted for their religious beliefs.

It is not known when Stoen left Guyana.

In the Journal article, Stoen said he was given no opportunity to respond to the accusations made

against him, but the Grapevine has been unable to discover his whereabouts.

Rev. Jones has been in Guyana and Charles Gerry, the San Francisco attorney who has been representing the Peoples Temple, has declined to comment.

Last week's Grapevine carried a lengthy article titled "The Other Side of Peoples Temple," based on the church's own newspaper and statements made by prominent people in defense of the church.

Ironically, the New West article noted the Peoples Temple's activities in social and medical programs and its support of the press.

The church supported the four Fresno newsmen who went to jail rather than reveal the names of their news sources and in 1974, the Peoples Temple made donations of more than \$4,000 to 14 media organizations "in defense of a free press."

According to a July 20 article in the Press Democrat, donations included \$300 each to that newspaper and to the Utah Daily Journal.

There is more irony in the fact that Stoen's Utah attorney is a member of the same law firm that is representing Journal publisher Dean DeVries in his lawsuit against the Grapevine and the Grapevine's cross-complaint charging anti-trust activities.

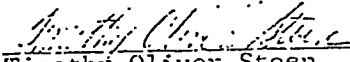
BB-31-b-95

TO WHOM IT MAY CONCERN

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

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

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



Timothy Oliver Stoen
Post Office Box 126
Ukiah, California 95482

Dated: February 6, 1972

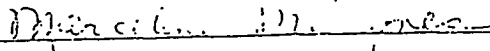
Witnessed: 

EXHIBIT C-2

BB-31-b-97

DEAR GENE,

AM REALLY ENJOYING GUYANA. THE PEOPLE ARE SO CONSIDERATE AND HELPFUL. AM VERY IMPRESSED BY THE GOVERNMENT LEADERS.

MY SON, JOHN VICTOR, IS WITH ME AND DOING GREAT. HE CAN READ, HAS DEVELOPED HIS MOTOR COORDINATION TREMENDOUSLY, AND IS LEARNING ALL KINDS OF INTERESTING THINGS ABOUT NATURE. TOM GRUBBS AND HIS OTHER TEACHERS ARE GIFTED THEORETICALLY AND PRACTICALLY. HE IS RECEIVING LOTS OF LOVE AND AFFECTION, AND IS HAPPY AS A LARK.

HAVE BEEN ATTENDING TO VARIOUS LEGAL MATTERS, COOPERATION, COUNCIL UNIT IF I WILL BE REPORTING ON THIS.

REGARDS TO ALL. SINCERELY, *Jimmy Allen*



Pub. by Welling & Richter Limited, Georgetown, Guyana, South America



EUGENE CHAIKIN, ESQUIRE
P.O. Box 15023
SAN FRANCISCO, CALIFORNIA
94115
U.S.A.
AIR MAIL

Greek tragedy played on worldwide stage

By KATHY HUNTER

Greek tragedy is now being played on a stage which reaches from the remote jungles of Guyana to Uklah, and from San Francisco to the nation's capitol.

The major roles involve, in the traditional fashion of great theater, two men of high principles brought low by a fatal flaw in their character—one by pride and one by an unquestioning faith which blinded him to reality.

The gods only trouble themselves with those men who are great in spirit and attempt to challenge their Olympian omnipotence—the little men are left relatively undisturbed to play out their own roles in this life, whether they are chosen or thrust upon them by the fates.

Two men—once closer than any brothers—are now locked in a battle to the death, a battle in which no end can be foretold at this time.

The stakes? The future of a six-year-old child and the integrity of a church founded on the premise that it is more

important to love and hold out a helping hand to one's fellow man than to follow the time-honored dogma laid down by established religions.

There are no heroes or villains in this tragedy built upon human frailties—only two desperately driven men fighting for the mind and body of a boy they both claim as their son. The mother of the child, Grace Stoen, stands in the wings awaiting the outcome of the drama which began when she first committed herself to a man dedicated to a cause and who marched to a different drummer.

The woman, hardly more than a girl when she first placed her hand in that of Uklah Attorney Tim Stoen, became his wife in a moving ceremony conducted by the Rev. Jim Jones in the Peoples Temple at Redwood Valley, filled to capacity by those who wanted to express their joy at the union of these two young people, and all present agreed she could not have been more appropriately named, for she was graciousness personified and was im-

mediately taken into their hearts.

If Grace, as her husband now admits, had any doubts about the new world into which she was entering, she gave no sign and threw herself into the activities of the church which meant so much to her new husband.

A year and a half later, after a most difficult pregnancy, she gave birth to a son, whom her husband promptly called John-John. The Santa Rosa hospital records show that the boy was born at 2:00 p.m. on Jan. 25 of 1972 and that her husband was not only in the hospital with her but had been at her side constantly, before and during the delivery.

The boy, now age six, is far removed from that hospital room in which he wailed his first protesting cry upon entering this world and the home in which he was reared for the next four years by Grace and Tim Stoen.

He is now living in a "quasi-commune" village 100 air miles from Georgetown, Guyana, off the coast of South America, with no telephones and

unreachable except by air. Jim Jones, who established the commune and brought from 850 to 900 of his people there to help the natives learn modern agricultural practices to improve their way of life, claims that John-John is his son and refused to let Grace and Tim see the boy although they had traveled all the way from San Francisco to Guyana seeking to regain the child's custody.

Jones says Tim Stoen signed a paper affirming that John-John was not his son; that he had asked Jones to "wire a child" for him because he was incapable of doing so himself and, in his admiration and respect for Jones, wanted him to father the child.

Stoen maintains that medical tests prove he is more than capable of siring a child. He does not deny signing the statement but said "Jim asked it as a proof of faith" and he at that time, believed so strongly in Jones that he prevailed upon his wife to agree to go along with the statement. Stoen also adds that, as an attorney, he was well

aware the statement would not hold up in court and he now believes that Jones demanded it in order to "hold it over my head" in case he ever decided to leave the church.

"I was a fool," Stoen said in a two-hour telephone interview with this reporter late yesterday.

The rift between Stoen and his wife widened over the years as he became more and more preoccupied with the affairs of the church and she became more and more disenchanted with Jones and his changing attitudes. However, when Jones asked her to go to San Francisco and work with the people there as a counselor and supporter of the church, she agreed to please her husband.

It was in San Francisco that Grace became more and more questioning of Jim Jones and his methods and approaches to people and finally decided that she had "had it" and that to save her sanity she had to get away to "think things out" and plan her future.

Stoen said she left John-John with the Peoples Temple because she felt it best for the child that his normal routine should not be disturbed. Months before, she and her husband had given their power of attorney to Jones and several "trusted nurses" to look after the child's interests in case anything happened to either her or Tim.

Stoen said yesterday: "Grace felt the highest act of love for John-John was to leave him there in an

environment to which he was accustomed until she got established and got her mind together as to the future."

Stoen said, with more than a little bitterness: "We had no idea he would be removed from the country."

He repeated again: "I was a fool."

And what of the other side of the coin? At no time did Stoen permit himself to express anger or animosity toward the Jim Jones "I practically worshipped."

He does, however, believe that the continuing harassments Jones and his family endured in Redwood Valley from those opposed to "nigger lovers" and Jones' philosophy that all men are created equal but "some need more help than others," led to a suspicion of those about him and prompted him to engage personal bodyguards during his last years here.

Stoen also believes that as more and more people came into Jones' church and saw him as a "father figure" or "the second coming," Jones lost touch with reality and saw himself as a saviour of mankind and, according to Stoen, put himself above God—or, at least, as sitting by his right hand.

Stoen said the change became only gradually apparent to him and that, because he believed so firmly in the good the church did, he did not want to burn it in any way.

(Cont'd on Page 2)

EXHIBIT D

Uklah Daily Journal

117th Year No. 247 Uklah, Mendocino County, California Monday, February 27, 1978 12 Pages—8 Page Tab 2 Sections—15 Cents

BB-31-b-99

A real life Greek tragedy

(Cont'd from Page 1)
Despite all that has happened he cannot forget the warmth and feeling we have so much of himself to others that he might have reached a point of no return.

He speaks of the children of different races that Jim and his wife, Marceline, adopted, cared for and loved as their very own. He knows of Jim's deep compassion for those in need; of his love of all animal life; of his sincere desire to establish upon this earth a true brotherhood of man.

Stoen remembers when he was first appointed director of the Legal Services Foundation here and had no money available to clean up the offices allotted him and how he appealed to Jim and the next day 25 members of the church turned up with mops, brooms, paint brushes and sheer will to put the place in order.

He knows of the families in need who did not qualify for any assistance due to bureaucratic regulations and to whom Jim Jones held out his hand and opened up his wallet.

Stoen firmly believes that the senseless persecution Jim

and his family and parishioners suffered in Redwood Valley was the catalyst which, in the end, brought a great and heroic man down to the lowest common denominator of mankind and destroyed forever a cherished dream of peace on earth and love for one's brother.



REV. JIM JONES
Claims he's the father

But, Stoen says with a fervor which cannot be ignored:

"I love my son so much I am willing to go through whatever humiliation Jim puts me through to get my son back. I just wish Jim to get well and I don't wish any harm to him but I will do everything in my power that is ethical to ensure his return to me and to Grace."

Despite Stoen's turning of the other cheek in the best Christian tradition, his humanness as a man who feels he has been betrayed by one he trusted and for whom he gave up his former rather "posh" way of living, complete with Porsche and the wardrobe and female companionship to go along with it, one cannot help but detect that, despite his protestations, he is a bitter, completely disillusioned man who will stop at nothing to regain the child he says is his and revenge himself upon the man he has come to consider as having feet of clay — and a very poor grade of clay, at that.

He bitterly regrets what he terms "the neglect of my wife" for the church and the man to whom he had given his complete devotion — only to lose all he held dear. "I

neglected my wife although I loved her dearly — I neglected her."

He tells of his wife's return to Jim Jones and her demand for the return of her son.



TIM STOEN
Tug-of-war over child

He tells of his deep love for her and of his hopes that sometime in the future, God and the fates willing, that she and the child he firmly believes is his, will be reunited in a normal family relationship.

He tells, almost proudly of how his wife faced Jim Jones and told him what she thought of what he had become and demanded the return of her son.

"She really told him off," Stoen said. "She told him he had become too hard on his people, that he was not making them happy and that he had lost his kindness which drew so many people to him in the first place."

Stoen said Jones was "very angry" with her for facing him down and said the pastor was actually an atheist — that he came to believe at the end that "there couldn't be any other God than him."

He acknowledged that he had seen what he considered true faith healing performed by Jones but accused Jones of coming to believe that he, not God, was responsible for the healing.

Stoen told of his fears for his life and that of his wife when they went to Guyana in an attempt to regain custody of John-John — of the threats that had been made and of the government's demand that they leave the country at once.

Stoen, a mild-mannered man to all who knew him, sent his wife to Trinidad for her own safety but refused to leave Guyana himself although "Jim has tremendous 'clout' there, for he has 'charismatic' personality and the government there had come completely under his spell, feeling that a man who could do what he did for their people in his agricultural venture, could do no wrong and anyone who tried to interfere with him or his work, would find himself on the next plane out of the country."

"Grace and I have already spent more than \$18,000 of our own money trying to get our son back," Stoen said, "but we're not giving up."

He spoke, almost casually of the death threats he had received and the threatening calls to his aging mother.

"Our present goal is to try to pay off our present debts and obtain more money to continue our fight to work our way out of this nightmare," and, he added.

"We do learn from our mistakes and this has been one very tough lesson."

Group forms to protest

Davis leads in

BB-31-b-100

ENDORSED-FILED

MAY 22 1978

VIOLA RICHARDSON
MENDOCINO COUNTY CLERK

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

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF MENDOCINO

10 STEVEN A. KATSARIS,
11 Plaintiff,

12 v.

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

No. 39911

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

18
19 Plaintiff alleges:

20 FIRST CAUSE OF ACTION

21 1. Plaintiff is informed and believes and thereon alleges that
22 Defendant SANDRA BRADSHAW, also known as SANDRA INGRAM, is and at
23 times herein mentioned was a resident of Mendocino County, California
24 2. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST was and
25 is a nonprofit corporation organized and existing under and by virtue
26 of the laws of the State of California.

BB-31-6-101

EXHIBIT E

FILED

JUN 7 1978

John J. Corcoran, County Clerk

M Medlock
BY M. MEDLOCK, DEPUTY

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

5
6
7
8
9

CCP
P

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

10 WADE B. MEDLOCK and MABEL M.
MEDLOCK, husband and wife,

11 Plaintiffs,

No. 243232

12 vs.

13 JAMES WARREN JONES, also known
14 as JIM JONES; PEOPLES TEMPLE
OF THE DISCIPLES OF CHRIST, a
15 nonprofit corporation; ENOLA M.
NELSON; ENOLA M. NELSON REALTY;
16 HUGH FORTSYN; JAMES McELVANE;
and FIRST DOE through FIFTIETH
17 DOE, inclusive,

18 Defendants.

COMPLAINT FOR COMPENSATORY
AND PUNITIVE DAMAGES FOR
CONVERSION BASED ON COERCION
AND FOR INTENTIONAL INFLIC-
TION OF EMOTIONAL DISTRESS

19

20 Plaintiffs allege:

21 FIRST CAUSE OF ACTION

22 1. Plaintiffs are informed and believe and thereon allege that
23 defendant JAMES McELVANE is, and at all times herein mentioned was,
24 a resident of the County of Los Angeles, State of California.

25 2. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST ("PEOPLES
26 TEMPLE") is, and at all times herein mentioned was, a nonprofit cor-

BB-31-6-102

EXHIBIT F 7 -

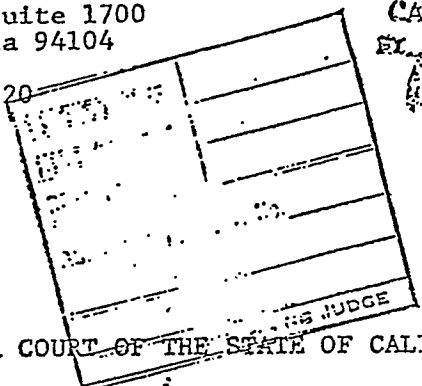
FILED

San Francisco County Superior Court

JUN 22 1978

CARE M. OLSEN, Clerk

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



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

10 JAMES COBB, JR.,
11 Plaintiff,

No. 739907

12 vs.

13 PEOPLES TEMPLE OF THE DISCIPLES
OF CHRIST, a nonprofit corpora-
14 tion; JAMES WARREN JONES, also
known as JIM JONES; TERESA BU-
15 FORD; JEAN F. BROWN; PAMELA G.
MOTON; and FIRST DOE through
16 FIFTIETH DOE, inclusive,
17 Defendants.

COMPLAINT FOR COMPENSATORY AND
PUNITIVE DAMAGES FOR INTENTIONAL
INFLECTION OF EMOTIONAL DISTRESS
AND FOR LIBEL ON ITS FACE

18

19 Plaintiff alleges:

20 FIRST CAUSE OF ACTION

21 1. Defendant PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST ("PEOPLES
22 TEMPLE") is, and at all times herein mentioned was, a nonprofit cor-
23 poration organized and existing under and by virtue of the law of the
24 State of California. Plaintiff is informed and believes and thereon
25 alleges that the principal place of business of defendant PEOPLES
26 TEMPLE is at 1859 Geary Boulevard in the City and County of San Fran-

BB-31-6-103

EXHIBIT G

VERIFICATION

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I, CAROL STAHL am
President of plaintiff PEOPLES TEMPLE, a nonprofit in the
corporation,
above entitled action.

I have read the foregoing Complaint for Temporary Restraining Order, Preliminary and Permanent Injunctions; and Damages; Memorandum of Points and Authorities; and Declaration in Support of Complaint and know the contents thereof; and the same is true of my own knowledge, except as to the matters which are therein stated upon my information or belief, and as to those matters I believe it to be true.

I declare under penalty of perjury the foregoing is true and correct. Executed on July __, 1978 at
San Francisco, California.

Carol Stahl

CAROL STAHL

GARRY, DREYFUS, McTERNAN, BROTSKY,
HERNDON & PESONEN, INC.
1256 MARKET STREET AT CIVIC CENTER
SAN FRANCISCO, CALIFORNIA 94102
TEL: 864-3111

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