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6 Attorney for Defendant

7  
8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

10 PEOPLES TEMPLE OF THE DISCIPLES )  
11 OF CHRIST, a nonprofit corporation, )  
12 JEAN BROWN, and JAMES McELVANE, ) NO. 740531  
13 Plaintiffs, ) DECLARATION BY STEVEN A.  
14 v. ) KATSARIS OPPOSING APPLICATION  
15 TIMOTHY OLIVER STOEN, ) FOR PRELIMINARY INJUNCTION  
16 Defendant. )

17 I, Steven A. Katsaris, declare:

18 1. I am the plaintiff in a lawsuit entitled KATSARIS vs.  
19 JONES, PEOPLES TEMPLE, et al, filed on May 16, 1978, in the  
20 Superior Court for the County of Mendocino, Civil Case No. 39911.  
21 A copy of the amended complaint (filed May 22, 1978) is attached  
22 and made a part hereof. My attorney is Timothy Oliver Stoen.  
23 2. This declaration is made in opposition to plaintiff's  
24 application for a preliminary injunction. I am requesting that  
25 Timothy Oliver Stoen, the defendant in the within action, be  
26 allowed to remain as attorney of record on my behalf and to

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1 prosecute my lawsuit through to its conclusion.

2 3. I have known Timothy Oliver Stoen since 1972, when he  
3 was an assistant district attorney in Mendocino County, where  
4 I work and reside. As the Director of Trinity School for  
5 Children in the small community of Ukiah, California, I am  
6 regularly brought into contact with attorneys, law enforcement  
7 officials, and others in civic leadership capacities. Even  
8 before I met Mr. Stoen, I had heard of him and knew he enjoyed  
9 the respect and esteem of the community leaders as a very  
10 capable, effective, and decisive attorney.

11 4. On April 11, 1978, I was the spokesman for a group of  
12 "Concerned Relatives" and delivered to PEOPLES TEMPLE  
13 representatives in San Francisco a document entitled, "Accusation  
14 of Human Rights Violations by Rev. James Warren Jones Against  
15 Our Children and Relatives at the Peoples Temple Jungle Encamp-  
16 ment in Guyana, South America." On the following day an article  
17 appeared in the "Santa Rosa Press Democrat" newspaper quoting a  
18 representative of PEOPLES TEMPLE, Sandra Ingram, as stating that  
19 I was a child molester. This was the second instance where PEOPLES  
20 TEMPLE representatives had publicly defamed me with this totally  
21 false charge. I was determined to expose their vicious and  
22 unfounded attacks, which in my opinion were designed to intimidate  
23 me into silence concerning the true nature of their organization.

24 5. The expenses of maintaining two of my children in college,  
25 Elaine at Stanford and Anthony at the University of California,  
26 Chico, along with the large sums I had already spent on two trips

1 to Guyana attempting to help my daughter, Maria, made me  
2 apprehensive about the legal costs involved in seeking legal  
3 recourse against the attacks on my reputation. I was then,  
4 and am now, worried about the irreparable damage such charges  
5 could do to a man whose life is devoted to helping children.

6 6. I decided to approach Tim Stoen with my dilemma and  
7 ask him to represent me. I explained to him my plans to  
8 voluntarily submit to a lie detector test so that he and others  
9 would have no doubt concerning the truth of my innocence. I asked  
10 him to represent me on a contingency basis, explaining that I  
11 had few funds left for legal costs. I also told him I had  
12 confidence he was an aggressive and extremely capable attorney  
13 who would act with dispatch. I also explained to him that I had  
14 seen his professional resume (attached as Exhibit A), his  
15 character references (attached as Exhibit B) and the Board of  
16 Supervisors resolution commending him (attached as Exhibit C).

17 7. When I met with Mr. Stoen at his office in San Francisco  
18 on April 21, 1978, I told him I wanted to proceed immediately.  
19 Many of the people I work with professionally had read the "Press  
20 Democrat" article, and I told Mr. Stoen I needed to respond without  
21 delay with a lawsuit to bring PEOPLES TEMPLE to justice. We looked  
22 in the telephone book yellow pages for the most reputable appearing  
23 polygraph firm. We set up an appointment with George Harmon,  
24 and I followed up with a letter written on my initiative to  
25 Mr. Harmon, a copy of which is attached hereto as Exhibit D and  
26 made a part hereof. I took the lie detector test on May 2, 1978.

1 On May 3, 1978, Mr. Harmon issued his report saying I was  
2 "telling the truth". That report is part of my lawsuit  
3 attached hereto.

4 8. On April 25, 1978, ex-members of PEOPLES TEMPLE held a  
5 "Concerned Relatives" meeting in Los Angeles at the Saint James  
6 Missionary Baptist Church. At the meeting were Wade and Mabel  
7 Medlock, who told us that PEOPLES TEMPLE had taken all of their  
8 property from them by means of threats made by Jim Jones  
9 personally that they would be killed. I was so upset after  
10 hearing their story that I went up to them at the end of the  
11 meeting and asked them to consider filing a suit, suggesting  
12 they talk to Tim Stoen. It was after this that they first  
13 contacted him about their case. I did, however, ask Mr. Stoen  
14 to put my case first because of the urgency of the situation  
15 regarding my reputation.

16 9. The purpose of this declaration is to state categorically  
17 that Mr. Stoen's involvement in my lawsuit originated with me,  
18 and that I am represented by Mr. Stoen at my request. He never  
19 solicited my case in any way. I believe my interests would be  
20 gravely comprised if he were not my attorney.

21 10. I hereby consent to Mr. Stoen disclosing all of the  
22 circumstances whereby he became my attorney and all of the  
23 information I have given him.  
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3 VERIFICATION

4 I, the undersigned, say:

5 I am a declarant in this action;

6 ~~XXXXXX~~ the above document is true  
7 of my own knowledge, except as to the matters that are stated in  
8 it on my information and belief, as as to those matters, I believe  
9 them to be true.

10 Executed on July 29, 1978, at San

11 Francisco, California.

12 I declare under penalty of perjury that the above is  
13 true and correct.

14  
15 Shirley A. Katsaris  
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