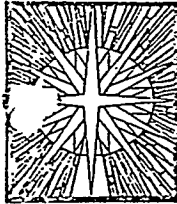


TIMOTHY STOEN

Former attorney for Peoples Temple, Timothy O. Stoen, left the church's Agricultural Mission headquarters in Georgetown, Guyana, in spring of 1977. From that time on he has worked against the Temple and Rev. Jones, culminating in a \$150 million lawsuit filed by Temple members against him for violation of attorney-client privilege and using his former capacity as legal counsel in a personal vendetta against Rev. Jones.

His actions against the church and Rev. Jones have included filing a custody suit for the child John Victor, who is Rev. Jones' own son; pressuring Senate and House of Representative members and the U.S. State Department to take action against Rev. Jones in Guyana and to interfere in the Guyanese courts of law; agent-provocateur activities (before and during his Temple membership) designed to steer the church members away from the non-violent teachings of Rev. Jones; organizing ex-members of the Temple and parents and loved ones of members overseas into anti-Temple activity by spreading malicious rumours and false allegations about life at the Temple Agricultural and Medical Cooperative at Jonestown. In August, 1978, Mr. Stoen was quoted by a non-member and parent of a young woman overseas as saying, "If Rev. Jones is smart, he will return the child to me and I will get off his back." He has belied the absolutely vindictive nature of his campaign to discredit and malign the work of Rev. Jones and Peoples Temple.

x-4-u-1



PEOPLES TEMPLE

OF THE
DISCIPLES OF CHRIST

Jim Jones,
Pastor

February 24, 1978

"For I was an hungered
and ye gave me meat:
I was thirsty
and ye gave me drink:
I was a stranger
and ye took me in;
Naked, and ye clothed me;
I was sick, and ye visited me;
I was in prison,
and ye came unto me.

"Then shall the righteous
Answer him, saying,
When saw we thee an hungered
And fed thee?
Or thirsty,
And gave thee drink?
When saw we thee a stranger
And took thee in?
Or naked, and clothed thee?
Or when saw we thee sick?
Or in prison,
And came unto thee?

"I say unto you,
such as ye have done it
Unto one of the least of these...
Ye have done it unto me"
Matthew 25:35-40

Dear

Enclosed is a copy of the actual radio interview that took place between Rev. Jones and Mr. Tim Reiterman of the Examiner on the morning of February 22, 1978. Rev. Jones wanted you to have a copy of it to compare with the version that will appear in print in the Examiner within the next few days. He has had confidence in your objectivity and journalistic ethic over the past years and in a case this sensitive felt you should know exactly what was said in the interview.

Jim is the father of the child, a chapter which is by no means the proudest of his achievements, but he is deeply devoted to his child now that he is here. The child is explicitly happy and leading a stable life in a beautiful and egalitarian environment.

As Rev. Jones and Peoples Temple have received biased and negatively prejudiced press coverage in the San Francisco Examiner, we wanted you, who have shown yourself to be a respectable journalist, to have an actual transcript of the interview.

Yours sincerely,

Jean Brown

x-4-i-2

Interview with Rev. Jim Jones by Examiner writer Tim Reiterman:
Transcript of 2/22/78

1. The first question is, who is the father of John Victor Stoen?
And how can the claim be supported?

J.J: I am the father. Statements have been made by both people on public and on private occasions. I challenge him to take all the blood tests -- all the sophisticated blood tests available -- and compare them to the child and myself. I challenge them to take a polygraph and truth serum. Under objective circumstances, why would I risk my reputation for my child that they both abandoned unless it were indeed mine? Not to mention the thousands of dollars in legal defense.

T.R: 2. Would you be willing to come back to the United States or some neutral turf and take the same tests?

J.J: Absolutely! But it can be done here. This is a very developed country. Or it can be done in a neutral country. It can be done in the capital with advertisements in the Pegasus Hotel if necessary. They certainly wouldn't be calling this country backward or biased, would they? If they want to put the child through it, I will comply. I do not want to put my child through this publicity, but I will naturally defend my right of parentage and use every legal means possible to not let my child be used as a pawn by them. I want dental studies comparing me and my child, and other medical studies that can be done by experts. I am talking about the most highly sophisticated studies.

3. That's my next question. A legal claim. Why haven't you claimed in a court of law that you are the father of the child?

J.J: I am following the advice of my lawyer. My lawyer here has done so or is doing so now, if he has not already completed it. I could have done so earlier, but I did not want to cause embarrassment for a little child. I had assurances from them, their full word, witnessed publicly and privately (that is from Mr. and Mrs. Stoen) that they would allow my wife and I to continue to rear my child as we have for several years, who looks exactly like a replica of my childhood pictures.

T.R: 4. Why have you not returned to the United States to answer allegations?

J.J: Certainly not because of lying allegations, but because I have been advised this is the best way to protect my child. Furthermore, I am doing a valuable humanitarian work, which can surely help to cement relations between two countries and sow good will.

T.R: 5. Why were you not at the birth, why is your name not on the birth certificate, and why did you not rear the child after the child came home from the hospital?

J.J: I was present at the hospital and she introduced me as the father to several people there. And I did rear him from a very early age. She did not consult me about the birth certificate. If I had been consulted, I would not have wanted to stigmatize the child as illegitimate. And I had been given their word I could rear my child. She also,

X-4-1-3

Page 2

on numerous occasions when we were together with my son, introduced me as the father to people outside of the church. She should remember well.

6. Next question is how did you come to sire this child, if it is true that you sired the child. Or why were you having relations with Mrs. Stoen, if that's the case?

See Stoen's sworn affidavit. It was printed by Herb Caen. It is a statement sworn under penalty of perjury by Stoen.

7. Did you feel it was your place to sire a son for one of your church members when you had been so generous as to adopt children, and had shown yourself as someone who believed in adoption as an important way to help people? Why, as an advocate of adoption, did you feel it was necessary to sire a son for one of your church members?

I would rather not embarrass the relatives of Mr. and Mrs. Stoen, because it has to do with Mr. and Mrs. Stoen's very personal lives, and I am sure they do not want it aired.

8. I wonder if you would try (radio) again at some later time to clarify for me where we stand on the questions submitted by the Examiner.

I am working on them very thoroughly now. I am a very busy man. Your fairness with the information you got today and printing my answers in full will determine whether I submit the answers and give the interviews here to your paper. I have reason to be skeptical because of past treatment by your newspaper. You could certainly understand my skepticism when you have the audacity to print that I would believe I were Jesus Christ or Mao.

-- END --

x-4-i-4

HERB CAEN



TALK ABOUT a can of worms . . . When we last left the Rev. Jim Jones, leader of the 20,000-strong Peoples Temple here, he and hundreds of his followers had gone to the Temple plantation in Guyana, leaving headlined charges of various scandals in their wake. Since then, Dist. Atty. Joe Freitas has said he found "absolutely nothing" that would cause him to prosecute, so why does the Rev. Jones remain in the steaming jungles of South America?

One reason, as disclosed here some time back, is his fear that a six-year-old boy he describes as "my son" would be taken away if he returned. He means "my son" literally, even though Timothy Oliver Stoen, a former Asst. Dist. Atty. here, and his more or less estranged wife, Grace Lucy Stoen, claim the lad is THEIR son. A custody fight, centered in Guyana, is still hanging fire.

Floating around is what appears to be an affidavit signed by Tim Stoen on February 6, 1972, and witnessed by Marceline M. Jones, the Rev. Jones' wife. It states in part that "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 . . . was unable after extensive attempts, to sire one myself. My reason for wanting James W. Jones to do this is that I wanted my child to be fathered . . . by the most compassionate, honest and courageous human being the world contains."

* * *

At the time, Stoen was legal adviser to Peoples Temple; he has since left that church. Says his lawyer, Patrick Hallinan: "I think that when Tim signed that affidavit, he really believed Jones WAS the father of his son. He no longer believes it. Neither do I. I think he was hoodwinked into signing that paper." Mrs. Stoen's lawyer, Jeffrey Haas, says hotly, "WHAT affidavit? As a matter of fact, I've heard that Jim Jones is sterile." Jones' lawyer, Charles Garry, with a twinkle: "I have not seen that affidavit. I have, however, seen the boy in question, and he is the spittin' image of Jim. Jim sterile? He has fathered a child since that boy was born."

At the moment, a Judge in Guyana is trying to decide whether the case should be resolved in San Francisco. As I said, your basic can of worms.

* * *

x-4-i-5

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
Timothy Oliver Stoen
Post Office Box 126
Ukiah, California 95482

Dated: February 6, 1972

Witnessed: Marceline M. Jones

x-4-i-6
~~4-5-gms~~

Tim has gone out + bought

1 wig
2 negligee's
1 slip
nylons
woman's underwear

I jumped on him hard, and he told me to mind my own business. I told him he did NOT have the privilege to do such things + I WAS pissed. I said for John's sake not to do this. He said, "Oh, I think it's more than that!" (Implying ME). I told him I did NOT care for^{him} didn't bother him (he agreed) + wanted nothing to do with him, etc. He told me to get Fucked. I told him he was defensive, + would bring to Council. He said FINE.

x-4-i-7

Ukiah, Mendocino County, California Tuesday, August 23, 1977

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 persecuted, 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'

x-4-i-8a

STATEMENT OF IN RE CUSTODY OF JONATHAN VIKTOR STEEN

To whom it may concern:

I, Timothy C. Stern, declare and certify as follows:

I am the legal father of John Victor Simon, a minor of the age

45 years, born 25 January 1977. The legal mother of said minor is

Grace ~~was~~ Stoen. The purpose of this statement is to show ^{why} ~~that~~ Grace

Shorn is unfit to be awarded The custody of said minor should she ~~be~~ file a
divorce custody or divorce action in a Guyanese court; and c) to Shorn to the government of Guyana
that she is a dangerous reactionary who has indicated she would write will to Leibel before he departs.
In July 1976 Grace Shorn abandoned said minor and ran off with
~~a young man~~
To me and others

another man, She indicated ^{to me and others} before she left that she wanted said minor.

in Jonestown, Northwest District, Guyana, South America
to live. ~~He~~ under the pastoral care of Rev James W. Jones. ~~He left the~~

The main reason given for the fall of the
Grace Stein was to live with is a reactionist / who by word and deed
is totally opposed to Socialism. Grace Stein has herself become a reactionist

racist who by word and deed is totally opposed to Socialism. ^{After} ~~She~~ ^{has} ~~has~~ ^{indicated} that she would work for the CIA to help it to be kept the usual way 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 Quico Stoen reaffirmed to me and others her

desire that said minor live in Yagajua under the care of Pastor J. J. J.

• Said Miller was ~~born~~ ^{came to live} in Guyana in September 1976,

where he has remained ever since since Shon was given a reward

trip air ticket k visit ~~har~~ sayi nikalun n qayam.

LAW OFFICES OF
GARRY, DREYFUS, McTERNAN, BROTSKY, HERNDON & PESONEN, INC.

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SAN JOSE OFFICE

250 SO. MARKET STREET
SAN JOSE 95113
(408) 286.9222

February 10, 1978

To Whom It May Concern:

The child custody case involving the parties Timothy O. and Grace Lucy Stoen vs. Rev. James W. Jones is a domestic matter that is being handled appropriately and adequately within the court system of Guyana, South America.

There is no reason whatsoever for any interference in this case from parties acting in any governmental capacity from the United States.

Your cooperation in leaving the settlement of this domestic matter to the Guyanese courts is appreciated by our offices.

Very truly yours,

Charles R. Garry
Charles R. Garry
Attorney at Law

CRG/jfb

X-4-i-10

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CHIEF OF STAFF

Congress of the United States
Committee on International Relations

House of Representatives
Washington, D.C. 20515

February 17, 1978

Mr. Charles R. Garry
Attorney at Law
Law Offices of Garry, Dreyfus,
McTernan, Brotsky, Herndon
and Pesonen, Inc.
1256 Market Street at Civic Center
San Francisco, California 94102

RECEIVED
FEB 21 1978

Garry, Dreyfus, McTernan & Brotsky

Dear Attorney Garry:

This is to acknowledge your letter of February 10, 1978,
which was handcarried to our Subcommittee office by Mrs. James
W. Jones on February 15, 1978.

I agree, that there is no reason whatsoever that any
parties in a governmental capacity should interfere in the
domestic matter presently in the Guyana court system.

While I always have an interest in a fair hearing for all
persons, it has been the policy not to interfere in litigation
in the courts.

With warm personal regards,

Sincerely,

Gus Yatron
GUS YATRON
Chairman
Subcommittee
on Inter-American Affairs

GY:gf:gw
cc: Mrs. James W. Jones

x-4-i-u

STATEMENT

I, Jim Jones, affirm under penalty of perjury, that the following is true.

I firmly believe that the custody battle over my son, John Victor, is ~~nothing but~~ a politically-motivated ploy on the part of Timothy Stoen and a number of other individuals, using my son as a pawn in an attempt to destroy my life's work and the Peoples Temple Agricultural Project here in the North West Region of Guyana.

I base this conviction upon a massive and growing body of evidence of great complexity that I will herein attempt to highlight, with the help of supporting documents. The tangled web of circumstances is not easy to follow. I shall show, however, that this is not a simple custody matter at all, as the Stoens have attempted to portray it.

Originally Mr. Stoen himself insisted on my wife and I retaining custody of John, and agreed with many others in Peoples Temple who had observed the manner in which Mrs. Stoen comported herself with John, that she (Grace Stoen) was an unfit mother, and had no interest in the child. Mr. Stoen even visited my son here in Guyana and was most approving of John remaining here. However, Stoen later took a completely opposite position. It was then that he began making efforts to organize people against me and Peoples Temple, he recruited a group of people that he called "concerned relatives," bringing outlandish and reckless charges against the Peoples Temple Agricultural Project and myself which were never substantiated and which flew in the face of reality, as witnessed and attested to by a host of persons, including U.S. State Department observers.

I am convinced, and can clearly demonstrate, that the custody case is being used as a pretext to cause trouble for me and Peoples Temple. The complexity and totality of the factors involved are difficult to capsuleize: I need to go into background and some detail about the entire pattern of efforts against this church which has, under my dir-

X-4-i-12A

active for twenty-five years against racism, injustice, corruption, oppression, and a variety of social abuses. An active conspiracy to destroy our church has been carried on for many years. The total catalogue of harassments, death threats, arson attacks, attempts on my life and the lives of my children, sabotage, and the like would take a volume to detail. It has been in recent years, however, as our church has become more outspoken against injustice, and has attempted, in accordance with our religious beliefs, to live a co-operative lifestyle, that concerted efforts against us have taken a new and more serious dimension -- what our attorney, Charles Garry, has characterized as an "organized, premeditated, government campaign." About 18 months ago, according to documented information, Grace Stoen met with government agents to participate -- indeed, to play a key role -- in these efforts. They have included attempts to bribe and blackmail many former members, community leaders, and activists (such as American Indian Movement leader Dennis Banks) into denouncing Peoples Temple. Timothy Stoen, as I have indicated, came to participate in this campaign and take a leading role, even offering the money to prominent individuals in civil rights and progressive movements to denounce me. He has spent unspecified amounts of money (we know of at least \$20,000 US) in these and other efforts, even though he had no funds to begin with and has been unemployed for quite some time and, in any case, had no visible means of securing the money for these kinds of activities. Some of the highlights of this campaign have included:

--sabotage of mail between Guyana and the U.S.

--holding back of social security and pension checks from elderly people residing here at our community

--fronting of 'smear' articles to major U.S. media (and outside of the U.S.), full of outrageous lies and unsubstantiated allegations (Note: An expensive public relations firm was even hired to promote these efforts, spearheaded by a man with a long criminal record, and described by prison authorities as a 'con man,' a 'public menace,' and a person with 'an insatiable desire to get ahead.' The individual, Joseph Lazor, was mysteriously granted a private detective license by the State of California shortly after his release from jail, enabling him to pursue these activities).

--a systematic, concerted campaign of telephone harassment of a number of people, with the callers impersonating members of my church, in order to turn persons called against me and my church

x-4-i-12b

Statement of Jim Jones

-3-

--many more activities, including ransacking of our shipments, and the mysterious murder of a member of our church in December, 1977.

Stoen, as I mentioned, has been the key organizer behind a group of individuals styling themselves as the 'concerned relatives,' which include persons who have been a part of the anti-Jim Jones faction for months and in some cases, years. One of the members of this group has threatened to 'hire mercenaries' to send to Guyana in violation of international law and Guyana's sovereignty in order to 'retrieve' members of Peoples Temple legally residing here. Stoen has been -- according to absolutely reliable, documented proof -- in contact with an aerial reconnaissance outfit that has been involved in co-ordinating subversive activities with the help of armed mercenaries, in Africa.

Stoen has also spearheaded attempts to influence a host of U.S. Congressmen, Senators, State Department officials, U.S. Embassy officials, and other in trying to discredit us, as well as in trying to embarrass (and insulting -- in a direct, arrogant manner) the government of Guyana, even going so far as to cause or provoke an international incident which would (hopefully) jeopardize the standing of Peoples Temple here in Guyana.

Experts who have reviewed the chronicle of Mr. Stoen's activities, dating back to an incident some 15 years ago when he got himself arrested and kicked out of the German Democratic Republic (under strange circumstances) and used the incident to create decidedly unfavorable publicity against the GDR in the U.S. mass-media, have said that Stoen has acted in the manner of a CIA agent or operative, and it is my own belief that this may indeed be the case.

There is another dimension to this entire matter. According to his own sworn statement (Exhibit A, attached), Stoen, in 1971 insisted that his wife have sexual relations with me because he wanted a child and could not sire one himself. He referred to me in the statement as "the most compassionate, honest, and courageous human being the world contains." The statement was witnessed by my wife. I was not, as the statement clarifies, an eager participant
in it.

X-4-1-120

Statement of Jim Jones

-4-

in this arrangement, but acceded to Mr. Stoen's behests which, I say without hesitation, were desperately advanced. I was also -- simultaneously -- being pressured by Mrs. Stoen, whose extreme emotional instability caused her to resort to a form of sexual blackmail. She threatened that if I would not engage in sexual relations with her, she would do what she could to ruin me, Peoples Temple, and her husband. My wife of some thirty years and others with whom I discussed this matter, supported and encouraged me in the painful decision I came to at that time: to meet Mr. and Mrs. Stoen on their desperate terms. We saw no other way.

Since the pregnancy and subsequent child that came out of our relationship, Mrs. Stoen has callously and cruelly manipulated the entire situation -- with the child in the center of it all -- to deliberately cause me great pain and anguish, knowing well of my deep care and love for my son. This had caused my son severe emotional distress from which he is now fairly well recovered, though, when inflicted at such an early age it is difficult to say that such effects can be wholly overcome.

For years, Grace Stoen -- as has been witnessed by hundreds of people who knew her during this time -- was not a caring mother to John. She had bizarre child-rearing patterns that resulted in emotional torment to the child, who she often and openly spurned. On one occasion she locked the very young boy in the garage while she engaged in sexual relations with a man. The child could hear everything and was traumatized. My wife and I had to step in on many occasions to provide the child with the kind of consistent paternal and maternal care for John that Grace and Tim Stoen were unable to provide, and emotionally unprepared to assume.

It is obvious even to a person with ordinary common sense that the child represented to Mr. Stoen an image and reminder of his own personal (sexual) inadequacy, so that his attitude toward John was at best ambivalent and, at worst, resentful. Everyone was concerned, besides, about Grace Stoen's extremely erratic patterns.

x-4-i-12-d

(She finally ran off with a lover in 1976, abandoning the child -- indeed, she directly handed the child to me and my wife and said, within the child's hearing and in the presence of other witnesses: "here, he's yours, take him, I don't want any part of him."

Shortly after this, Mr. Stoen prepared the attached document (Exhibit 3) which details several well-known factors in Mrs. Stoen's outlook and personality. In this document, Mr. Stoen indicates, among other things, that Grace Stoen:

- is unfit to have custody over John
- is a dangerous reactionary who has indicated that she would work with the CIA to harm nations like Guyana
- abandoned the child and ran off with a reactionary racist, totally opposed to socialism
- wanted John to remain in Guyana under my care

(Grace Stoen, in addition, was given (by me) a round-trip ticket to come and visit her son. She cashed in the ticket. There are numerous sworn statements that are available to interested parties that also reflect upon Mrs. Stoen's unfitness and personal moral inadequacies (i.e., patterns of promiscuity, etc.).

(Now Mrs. Stoen is clamoring to have 'her son back' along with Timothy Stoen who, until several months ago was actively and firmly opposed to such a course, and was (to all appearances) a firm supporter of me and my work: in fact, in the face of Mrs. Stoen's original allegations, Stoen threatened to sue the publications carrying them for \$18 million! Even today, he is separated from Grace Stoen, who continues to live with other men. I must also remark that Mrs. Stoen's claims were not privately advanced, but were aired in the context of a series of dubious stratagems being advanced by several persons -- including government agents -- in conjunction with other bizarre allegations about Peoples Temple in the sensationalist press. The issue about 'getting her son back' was (and still is) part of a gross publicity stunt. Mrs. Stoen had been actively conspiring with a group of these individuals for the express purpose (in the words of one of the most outspoken of the false witnesses who she is collaborating with) 'destroying' me and

X-4-6-12E
X-4-6-12E gms

Statement of Jim Jones

-6-

(my organization.

The total change in the attitude of Mr. Stoen (he has now joined with those who he had been attacking, and has authored suits against us totalling \$53 million)-- and is also working with the very person -- his wife -- who he said was an unfit mother who would resort to working with the CIA to harm me) as well as the above-mentioned activities, leads to the inescapable conclusion that Mr. Stoen is actively working against me under severe pressure from those involved in the original efforts to destroy me and my work.

In all of this, their desire for custody has nothing what so ever to do with the welfare and well-being of John Victor. This (as I have said) is only a pretext, to advance conspiratorial efforts against me, as has been exhaustively documented. If I thought that Mrs. Stoen were sincerely concerned about her child, and was intending to rear him in a manner that would comport to his health and well-being, I would not have any hesitancy in releasing John to her custody, though I love the child dearly, and he is very attached to me and my wife. Such, however, is not the case with Mrs. Stoen. Far from it. This is a cruel, vicious attempt to use a child as a pawn in a devious game. The child is quite bright (indeed, brilliant) and understands much of what has been swirling around him. Though the nearly two years he has spent here in an environment of care and concern has helped markedly in his personal growth, and despite the fact that we have encouraged him not to harbor negative feelings about his mother --despite our own-- John is so emotionally scarred and wrought up over his mother that he has actually expressed that, were he to be returned to her custody, he would commit suicide.

In light of this, and in addition to all of the above factors and evidence, I am convinced that this whole custody case is a sham and is being pursued only as a vehicle to advance schemes to harm this organization. I am firmly, and on the highest moral grounds, opposed to sacrificing the welfare of my sons (which would be a certain consequence were he placed in the custody of Grace and/or Tim Stoen) and turning him over to what amounts to a

X-4-i-12f

Statement of Jim Jones

-7-

broken home (at best). I am joined in this resolve by literally thousands of people who know the situation, who have known for years that my wife and I have been the true and loving and consistent parents of John Victor. There are indeed other psychological factors in the case -- especially concerning extreme character disorders of Mr. Stoen (transvestitism) which have no doubt (as I have mentioned) contributed to his desire to be the father of the child, even if it meant imploring a surrogate to impregnate his wife.

Mr. Stoen has always been abnormally possessed with what he conceives as 'power' -- and his masculine image was threatened by his own personality weaknesses and aberrations (which resulted in his periodically donning women's garments and parading them in public). In order to psychologically compensate for this, Mr. Stoen wanted to have a son that would be the image and 'proof' of his potency, sired by a person whom he envied as lacking of image of the power he knew he lacked in himself.

I understood these factors, and Tim Stoen's own sense of desperation. I was, perhaps, on reflection, mistaken in meeting Mr. Stoen (and his wife) on their desperate terms, but today, over seven years later, I have to think not about the causes, but the consequences of that painful decision. I refer here to my son. And in the face of the errors, human failings, misplaced motives, jealousies, projections, and morass of insecurity and twisted desires that have characterized the actions of Grace and Tim Stoen, and which have propelled them on their destructive courses of action against me and Peoples Temple, I am determined to shield my son. I am pledged with my life that he will have a clear, bright future ahead of him. It is this determination of a father, it is in this spirit, that I have made this statement.

As a final note, I would like to add that I have personally chosen to make all the evidence in this matter public, even though the fact that I am --and freely admit to being-- the father of John Victor, constitutes as grave threat to my reputation, personal and professional standing as a minister and pastor of

X-4-i-12g

(Peoples Temple Christian Church, to my position in the community, in the civil rights movement in the United States, and within the Disciples of Christ denomination of which my church has been an affiliate for many years. I obviously have nothing to personally gain in doing this, and a great deal to lose. I only wish to protect the well-being and life of my son, to prevent him from being cruelly abused in a cheap ploy and power-play by people with no principles. I could have easily relinquished custody of John Victor to Grace Stoen and have avoided all of the personal and legal difficulties (arrest orders, legal fees, and many other problems and pressures that have ensued from my stand)-- taken on moral and ethical grounds alone-- to refuse to allow my son to be used as a pawn in a heartless game that has as its object the destruction of what I judge to be one of the most significant humanitarian and social justice organizations anywhere, confirmation of which you can get from a host of individuals who have positions of responsibility in public and civic life, in government service, in the religious community, everywhere-- who are intimately aware of the work of Peoples Temple, and who understand precisely why efforts (such as those outlined above) have been mounted to terminate it. Similar efforts, as is practically common knowledge, have been launched against many progressive and civil rights and third-world organizations in the U.S. that are working for a world of equality and economic justice.

I am attaching statements and further documentation that will help put all of this in perspective. What is being advanced is, as many have clearly recognized, no more 'custody case.' It is part of a conspiracy, operating at several levels.

I apologize for the somewhat disjointed and loose construction of this statement, which I have hastily dictated in order that it may be filed appropriately as soon as possible.

(Signed) _____

JIM JONES

x-4-i-12h

an patch of grass at Dr 3 ditch - each driveway - watched from a little far with binoculars -

Forbes after a 70 yr old woman took Burton a brother at young but had died -

At one street saw a sup. ^{1110 Michigan} intoxicated on a sup. - 10,000 mat raised for legs leading to death of
 little girl - ~~measured~~ ^{measured} that a man who had jumped & had raised to brain suit. I don't know what old he
 done to be more known except that psychologically ..

[illegible]

- I had been inf. a bunch of headshots for picture about a gal of trash - they said otherwise ..
and we went into a club type nightspots in old town + up the down-dirty stairs -

They pointed to a seat and we began to ^{sweet} ~~start~~ it. !! was 12:30 noon.

At first I thought surely this can't well be over if's time to put positive to...

saying that you can't do anything and that's not constructive & doing something constructive is the present.
 But as a Christian, we find that that was very true. It was my fault and you are not.
 But you know of just exactly what a Greek chair is - a mirror, a corner, a table, a long
 dining and a good table as we know and going out, you know, little things.
 French called it - a small dining, very pretty, with a table, but you have pictures of books
 and of words - like not us, Chinese and the world in out.

... then waited for 3 more hours. Decided that since I was there I should try to observe
... directly what goes on.

Soldiers with machine guns would sit about close enough to the machine and it was unnecessary to know very well that the one gun was used to kill people wanting to leave. Since many people are killed, the other ~~gun~~ ^{guns} which doesn't kill people the press.

They spend played with his ~~rough~~ spiral paper - the Federal Reserve with some 6 color lights and
Bureau. Duller system.

After the search on for the goods - gray, dirty uniform - no insignia - 20 yrs ...
skin fair, rough bone features - ~~but~~ dark skin, (melanin);

Under grass under a tree - a warm touch -

They didn't like this work.

the inked, dated 1/2 hr. So was companion

Stone didn't add up.

1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 26

$x - i - i - 5ia$

$$x - 4 - i - 51b$$

8

3) The whole length of my 1st interrogation.

but he seemed genuine to me with one single thing - my pocket - example a 25¢ nail clippers - he'd never seen before and it was leather do with him. unsuccessfully try to find out how it would, but he was one of those electric-type, coin counters - with a slot in it that you insert the coin and squeeze it. He checked it - it had the name of a Little Red Book on it.

After a while. For 7 p.m. to 3 a.m. I sat while for questioning - otherwise questions or else walking ^{in the morning} but he didn't ask me anything. I said, "There are a few I had conveniently 'forgotten' to take with me - and when I'd be sent to the border I'd be sent to the border in a plane for it had a border protection - it was a plane and probably would have been trouble for me if I had decided to. I would be what it looks like."

At 3 a.m. they left and said I should sleep in the chair. The next day, I got off at 2 a.m. I was quite tired. I got a piece of sleep. Because the man who would see me the next day, he had to see if I was "good" or not. The 7th day had to sleep for four days just might develop the film - but I felt that optimistic that my answer appeared to satisfy him.

About 7 a.m. anyway, very early a.m. I noticed a door of women + children passing outside the gate. He recalled that he & his wife had made a very long trip not only to a cruise not to vote but you have to vote at certain times - usually for the first time to 12 - else you are not a good citizen. And it became E. Reichen + appear a good citizen. I wondered how many

because he didn't want
to see him - I didn't
see him - I didn't
want to see him after

people would get up at 6 a.m. to vote in a free democracy. At 4 a.m. so - interruption - I saw the Cluffy with the car. I said with a laugh can it - and to my delight relief - good. And in the car, all my things, including the film, and he'd take me to the W. Berlin prison part, at the end of the street.

So I was driven by two men in an auto. The first man was a Stiller for the skin, and then the second man, they. The first advice was quite mild: it was after the effect that "I wish it was more for you no longer to go to the border with your camera." Anyway, he didn't let me know to my own end, and anyway, I didn't want to feel a very bad feeling.

Next day I was back safely in my car and then following the police of interest. I got a labor activist bldg. with a red flag on it. He would that I was to move because Adenauer was elected, and that Hitler was again.

X-4-1-51C

Communist

Going to Berlin

1. Not allowed. Only Germans.
2. Not to be taken: get into with 2 young law students - both spoke English - get into a Western hotel.
3. Young people with skin faces and hair - group of young - started us -
about 1000 of people, pay a fee of 10 marks (1.50) - be checked - sample this - or else carry in Communist rule.
4. Not to be taken: delay expected - to note must be a Antisemitism - illegal to stop or take pictures on it.
5. Two things impressed me:
1) women during the war of men - many in Germany had been to East and given a warning
Heavy work
2) the intellectually inferior propaganda posters - quite questions in symbols and obscenity -
Soviet looking, very under growing hand - for a gift of the world;
many of sitting children with communist continuous carry on signs clearly marked "made in U.S.A."
pictures pictures of Doves of peace looking around the birds of the Soviet Doves and the pictures.
6. This was just a bit of what I saw later.
7. Dream full of people, not able to see - actually called it the Democratic sector - got recognized
was like there - but then I had a whole lot of people (though due to fact the West, and second the
Communist dividing of Germany - separate former families - I was ignored - a sad moment
later the Communist under the Nazi Gestapo took power.
8. West Berlin - Prussia, Communist - people have got naturally into - words how they can be so.
9. Hotel - not a hotel - subsidized by govt - ~~the hotel~~
not many people there as yet - some - The West was not to go to Berlin, as it
was not - that's what I got all my time there. So people would be going with me -
Washington? - but Berlin since it got 5:1 ratio, people under
Political
10. Situation of E. Berlin:
from Berlin the island in German controlled E. Germany.
The conclusion of the war of was agreed that Berlin should be governed as a single entity by
France, the U.K., the U.S., and the USSR.
Up until Aug 13 the people of E. Berlin are allowed to go to the West to work, shop, visit, and attend
University, etc. - though don't take suitcases.
In the 16 years since the war, a steady stream of people from the satellite countries came to the free
world through this gate. This was the only place where there was the own culture and own
significance, the standards - obviously Moscow & Khrushchev have not been happy about it -
because of plan to prevent to have people leaving, and as the latter shortage in E. Germany.
So on Aug 13 - a blockade imposed on E. Berlin and has been trouble to leave. I was
I shall recount the rest of the below - except at first it was thought that by people that the West
supposed the West but now the evidence says that the West knew it was becoming a threat
it's just because clear that the war a bad decision - Communist got a big victory.
11. About: I saw how I saw things that the people & newspapers can't make sense - I saw
what some of police state due to individual human beings - instead of seeing the whole is the
of forces, ideology, power - I saw it is the fact of people just like this in America.
The now I will talk of the most startling and disturbing experience of my life.
12. In the day in Berlin

⑥ 1st day: - Sept 5 Friday

1. Approach: 9/1st a. O-Bahn - changed money - both cameras = German & Bahl still called in the morning

2. Go on underground - many leaves next, but as side the box closed - but his live was fixed in straw - quadr
 live... all the straw stems to prevent a falling from getting out this way

2. ~~but should present, checked in detail a few~~ ^{quintiles} ~~ad valorem and~~ ^{the} ~~the~~

Dad's lost his teeth & hand - was hurt with gears punk on light [see photo]

Didn't lost for not a friend - was not with me on night. (see previous)
Since no thought went to finding + find out what to do. 11 p.m. 1/2 of what was to do - had changed 1:30 at night
spend it in 3 days there.

1 went to bookshop and met a wise Yoruba:

[illegible]

We walked across - did in park at Otago saw of the heavy been tried + saw really close and had a picnic. did see the Ulukou bridge with shaft in if plan of trading accounts both witnesses.

----- his Mikey he was.

- It was harder to write the fear he had - you could feel it. Like she & Belton I walked with my camera - and people would sit it - looking up at us - and I'd be like - you are free it ain't? People on the runway never seemed to be looking directly - not like anyone should if you're pretty, not too deep. Maybe I was ready to be like that, what I had to do that I don't find out to.

[illegible]

----- but what was worse - to see the ~~products~~ & semi-birding quant.

Appellanten: beide jung, noch im Alter, nicht
noch und in diese Stunden mehr: Jungfrau & Sohn

Scenery - beautiful old glades - mostly wooded and small wood, bit rebuilt - imagine a
bad pasture blow

On W. side - main shed - thin shell - see picture - frayed w/ shells more open
In N.W. corner - pit used made it impossible to see the shore for industrial mts. One flood killed it
was pile of rubble, though not V. Schell still has notice its being gradually covered. [See pictures of eastern

- Did not take picture of Ulrich because made him nervous

----- Because he had been so quick as to show me around & wanted to do everything for me, I was in
After we I persuaded & found that he would very easily be spent some dollars - And we could not
act as in G. Berlin. So I promised to wait till 9 pm the next day without

[illegible]

"As I know him, he would be a good friend." To see those people with their eyes.

[illegible]
$$x = 4 - i - 51e$$

get pictures
to show to Rotary club

Went to to Bed - bought Alvin's book, and Can one am. 18 am. 50 fr. 10
 2 used take picture before with Ulrich. By a storage - comedian Ulrich had the ... he was
 ... you the go ... and ... the, and see a me: I said I wanted to follow the
 border north, where ... the 4 ... go - to see the ... one, ... and
 the border itself, ... he had to go to ad he and ... the ... he
 one with me. I ... I came by a ... and saw ... that stayed in ...
 there the "people's ... had ... could be ... with ... and ... in 3-5" price
 of ... to stop people ... into the ... then ... it hard to ... a ...
 - Back street, groups of children, women with market baskets
 Early ... out from the bldg.
 about 200-300 ft from border - groups of ... and ... stood just ...
 and ... of ... " ... more would come ... up - ... study ...
 Note: ... of ... to go in groups to be ...
 - The day ...
 border ...
 O ... 5 ft or so
 I ... 5 ft more -
 at ... double ...
 A ... is 10 ... at ... street - ... 200-300 ft ...

(9)

- (2) propaganda poster with call to arms being used to stir duty cap. 1st mobilization.
(3) picture of small children playing outdoors in one of better built areas with
badly built

(4) some magnificent bldgs owned by war-but splintered even in ruin

one of the things I discovered by talking to people.

How I will reveal some information. I learned from a person I met but where
can I say he was a strong electrician. I can't reveal because I fear for his safety, e.g. that

- (1) That every week every person must attend meetings, smaller or after a 2-3
times a week - meetings can last a long or 4 hours. I don't discuss these things
writings and the virtue of democratic state. I don't discuss these things
friends and people with common interests are separated. My informant told me that for meetings
were not for successful so far in understanding because for many people had been told that
(2) he said of the E. Berlin people had known before that he would be set up that
90% of them would have left all worldly goods to escape. That on Nov 18
actually actually support the regime. I also said that he was that it's because
the West knew about it before that.

- (3) That it's extremely difficult to have an underground spying system because
can't find anybody that he only evidence. His person knew for one was that after
the war was announced as of midnight. He suddenly & rightly of the order
was & surprise mysteriously went out - presumably to give people a chance to escape
in the darkness. But that the lighting was restored in two hours.

- (4) That even in the army. I learned that to be brought in from other areas to
help a check on the local soldiers became the local soldiers had no Communist
sympathy, and it was from above but made them carry out orders. One must note
that the system of morality is quite simple - the soldiers are told that there are
two types of Communists: good & bad. The good are those who obey Communist orders,
the bad are those who are not, regardless of family or a friend.

- (5) That then there's the technique of never allowing soldiers to act alone
at always 3 or 4 or 5. One step, who and come up to "help" the
duty of the soldier.

- (6) That the soldiers are not to be trusted because they
would jump on the wall so I saw the ludicrous sight of Communist
soldiers down the wall, back by back.

- (7) The most dangerous thing I saw was that the people have let faith
in the West's words. The Communist keep nothing away - and the USSR
is now in Berlin and the USSR program especially showed that the West was only

- (8) Children are protected incredibly easily - but recently the kind of Protestant children
found to have been a child of a Protestant family or a family of a Protestant family.

X-4-i-519

12

- 1) Long time labor.
- 2) giving preferred admittance to West because of refugees.
- 3) Long & by people for E. problem in W. Berlin.

Books 21-10 *in the first and the day of advent, my son*

ASSISTANT SECRETARY OF STATE
WASHINGTON

March 3, 1978

Dear Mr. Tropp:

Thank you for your inquiry of January 20 concerning the custody of the child of Mr. and Mrs. Tim Stoen.

I asked that the issue you described in your letter be investigated and that a report be made to me. I have been advised that the U.S. Embassy in Georgetown, at the request of Timothy Stoen's parents, expressed its interest in this case to Guyanese authorities solely to explain our hope that the custody dispute be adjudicated fairly and impartially. The Embassy has not taken sides in what is essentially a civil dispute between two groups of Americans, and the Embassy has exerted no pressure on the Guyanese Government to rule on this question in favor of one side or another.

The inquiries made by the American Embassy on behalf of the child's parents were normal protective services which any American citizen abroad can expect to receive from his government. The inquiries were not in any way directed to the substance of the case which is presently before the courts.

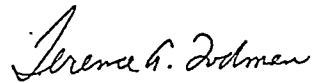
Mr. Richard D. Tropp,
P. O. Box 15157,
San Francisco, California 94115.

x-4-i-13

-2-

I trust this information will help you to understand more fully the role that the U.S. Embassy has played in this case. If you have any further questions, please feel free to call Ms. Elizabeth Powers in the State Department's Office of Special Consular Services on 632-9461.

Sincerely,



Terence A. Todman
Bureau of Inter-American Affairs

x-4-i-14

PAUL N. McCLOSKEY, JR.
12TH DISTRICT, CALIFORNIA

COMMITTEE ON
GOVERNMENT OPERATIONS
AND
COMMITTEE ON
MERCHANT MARINE
AND FISHERIES

Congress of the United States
House of Representatives
Washington, D.C. 20515

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305 GRANT AVENUE
PALO ALTO, CALIFORNIA 94301
(415) 324-7513
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March 2, 1978

Ms. Carolyn Thomas
998 Divisadero Apt. 104
San Francisco, CA 94117

Dear Ms. Thomas:

In response to your letter on behalf of the People's Temple Christian Church, my intervention in the case of John Victor Stoen, age 6, was requested by the District Attorney of San Francisco, Joseph Freitas, who furnished us with a copy of a child custody order from the San Francisco Superior Court dated November 18, 1977.

It is my understanding that John Victor Stoen's birth certificate filed in Sonoma County, California, reflects his birth on January 25, 1972, to Grace Lucy Stoen and Timothy Oliver Stoen at Santa Rosa Memorial Hospital.

It is apparently uncontested that Mr. and Mrs. Stoen were married at the time of the birth of the boy to Mrs. Stoen. It was my understanding when I practiced law in California for some years, that the presumption that the lawful husband was the father of the child is irrefutable since it is the law's intention that no child be made illegitimate by the claim of third persons that someone else was the father. The purpose behind this law of the state of California is to protect the child's right to legitimacy, rather than to protect the rights of the husband or mother.

Under these circumstances, it seems entirely appropriate for a Superior Court of the State of California to grant custody to a child born in California to the child's natural mother, reserving custody rights to the individual who is listed as the husband on the child's birth certificate.

Should Reverend Jones be indeed the natural father of John Victor Stoen, this would not in any way remove the child's right to the presumption of legitimacy which is given him under California law. As I understand Reverend Jones' position, he is in effect claiming that the child is a bastard; this the California law refuses to accept.

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS

x-4-i-15

Ms. Carolyn Thomas
Page Two
March 2, 1978

Under these conditions, I think it entirely appropriate that the United States government seek the assistance of the Guyanese government to prevent the bastardizing of a U.S. citizen, particularly one who is only six years of age. While freedom of religion is a basic right in America and guaranteed by our Constitution, I know of no honorable religion, particularly one headquartered in California, which would deny the right of our courts and our law to determine the legitimacy or illegitimacy of any child born in California.

I can appreciate your sympathies with Reverend Jones particularly if he is indeed the natural father, but the rights of the child in this case are properly protected by the government until such time as the child is old enough to make his own decisions.

Because your letter is only one of a number of others relating to this case, I am taking the liberty of sending a copy to each of the other individuals who have made similar inquiries.

Respectfully,

Paul N. McCloskey, Jr.
Paul N. McCloskey, Jr.

PNMcC:tt

x-4-i-16

President Carter
The White House
1600 Pennsylvania Avenue
Washington, D.C. 20500

Dear President Carter;

I am Dennis Banks, leader of the American Indian Movement. I am writing out of concern for my good friend, Jim Jones, who has been a loyal and tireless friend to the Indian people, and to all oppressed minorities in the United States. I understand his work in Guyana, as well as his small son, John, are being threatened by some very ugly methods. As a champion of justice through thick and thin, there is no one who could deserve such treatment less than Jim Jones.

I first met Rev. Jones when my wife, Ka-Mook was imprisoned in Kansas, on false charges that were later dropped. At that time, we were penniless and her bail was \$20,000. She had had our baby in jail, with the baby immediately removed from her and she was never given the proper medical attention that she needed. Jim Jones learned of our plight, and I was invited to come to the Peoples Temple church along with several of my associates from AIM. The same night I came, Jim Jones raised the money for Ka-Mook's bail from members of his congregation. I couldn't believe that these people, many or most of whom were from poor backgrounds themselves, were making this kind of sacrifice for me. But I learned later that Jim Jones himself has made this kind of sacrifice again and again over the years, and it was just his way, and the way of his people, to extend their help to the farthest limit when an injustice was involved.

Later I witnessed Jim Jones made the object of the same kind of false accusations, and I was approached myself by a man, David Conn, who said he was working with Treasury Department agents, and said he could give me help avoiding extradition (to a certain death in South Dakota jails) if I would only join the people who were lying on Jim Jones. He also implied that things would go badly for me if I did not agree, and it was clear to me that he was trying blackmail. I refused to go along with this scheme, and later exposed the man publicly for what he had done. This same man told me that one of the people he was working with was Grace Stoen, the mother of Jim Jones' child.

I did not know the background of John's situation at the time, but trusted in the integrity of a man I had seen do so much for me and so many others with no thought of reward or praise. Now that I know the true background of the situation, and how Grace Stoen rejected and abandoned her own son, I can well understand how she was working with these agents to try and destroy Jim Jones and the Peoples Temple plus anyone else who got in her way, because I have fifteen children, Mr. President, and this woman didn't care whether I lived or died, whether my children had a father or not, or whether my people were left without a leader. As you may know, it is also common for Indian children to be

x-4-i-17

(Page 2)

forced from their natural homes and put in foster homes when one parent is gone, so my devoted wife has the burden of not only my own future, but the future of all the Banks children as well.

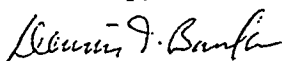
One more thing I want to add is that the Peoples Temple are very wonderful people. They work together, and build programs to help children, youth, and senior citizens. They extend friendship and assistance to whomever needs help, and never ask anything in return. Now they are working in Guyana, and saving the lives of Amerindian babies who would have died of malnutrition and gastroenteritis. It takes a very sick and cold-hearted person to turn against people like that.

I am sure that Jim Jones and his people are the best thing that could happen to Guyana. And Jim Jones being the kind of person he is, I'm sure he will also be making many Guyanese friends for the United States. It would be a terrible tragedy if anything happened that would hurt his son, John who has a wonderful future there. For him to go back to Grace Stoen, who doesn't even want him except to use him to hurt others, would be like having no future at all. It can't even be considered.

I stand behind Jim Jones keeping his son, and the unethical and vicious actions of Grace and Timothy Stoen being stopped. I urge you to do the same, President Carter. Anyone who carries moral authority as you do, cannot fail to see where justice lies.

I also urge you to further a policy towards Guyana that is humane and generous, because we all need to work together more closely in this hemisphere and help developing nations build a good life for their people. The Guyanese are people who were under colonial rule until a few years ago, and they need and deserve whatever aid America can give to them.

Sincerely,



Dennis J. Banks

x-4-i-18

February 28, 1978

President Jimmy Carter
The White House
Washington, D.C. 20500

Dear Mr. President:

I would like to commend to you highly the work of Reverend Jim Jones and the Peoples Temple. I first became acquainted with Jim Jones when he and his church came out early on behalf of my defense when I was in prison on charges for which I was later vindicated. This was at great risk to himself and his church, because my cause was not a popular one in church circles at that time. But I found on later personal contact with him, and to this day, that he is an ardent spokesman for justice who will speak out whenever he sees individuals or groups unjustly harassed or persecuted, whatever their race, background, or political persuasion. He is a humanitarian in the broadest sense of the word, who renders assistance often at great personal sacrifice, never concerned about what people think of his actions, but only that he is following the right course. He is a great champion of the poor and oppressed of our country, who has been able to organize and mobilize people to struggle for the racial equality and social justice which is our only insurance of freedom in the days to come.

You cannot realize how fortunate you are to have Rev. Jones spearhead his agricultural project in the Third World. He communicates with great sensitivity to Third World peoples, and his commitment to alleviating human suffering can hardly be matched. I am certain his intentions are of the best, and he will be a potent influence for good in strengthening America's relationship with that area of the hemisphere.

I understand efforts are underway to influence Congressmen to exert pressure on the State Department to intervene in a court matter under local Guyanese jurisdiction. This would be a foolhardy move, both from the standpoint of the best interests of the United States, and would surely antagonize the Guyanese, who are very competent to handle the matter, and the many thousands of Peoples Temple members and supporters here in the United States who are prepared to stand by Rev. Jones.

I urge you to give this matter your utmost consideration.

Sincerely yours,

Angela Y. Davis
Angela Y. Davis

x-4-i-19

Feb. 15, 1979

Congressman Timothy Wirth
Congressman George Miller
Washington, D.C.

Dear Gentlemen:

The progressive stand that President Carter and his administration has taken regarding U.S. and Caribbean affairs is one that I very much agree with. Realizing that Ambassador Young has worked diligently to establish these positive relations, I would hate to see his efforts being undermined. This, I am afraid may happen to some extent because of the presumptuous actions of one U.S. citizen, Tim Stoen.

Mr. Stoen has misrepresented his intentions, not only to the Guyanese government officials, but to some U.S. officials also. He is asking different people in the U.S. government to become involved in a private custody dispute within the country of Guyana, So. America. I understand that you gentlemen were approached by Mr. Stoen and he evidently was able to misconstrue some of the facts in this case sufficiently so as to cause you to go against already existing foreign policy of non-intervention in the domestic affairs of sovereign nations.

The United States has some very effective 'goodwill ambassadors' in the nation of Guyana, by the name of Peoples Temple church and Rev. James Jones. There are well over 1,000 people located at the church mission site in the North West District of Guyana. The services that the various members give to the surrounding communities include access to the Temple's doctor and entire medical staff free of cost; technical training in both agriculture and numerous mechanical areas; quality education for children and adults by certified teachers on location; additional protein supply to the area, introduced by the thousands of chickens, pigs, and various livestock on the project itself, and many, many other aspects as well. Peoples Temple also carries on human service programs in their San Francisco based church. Both the Temple and their pastor, are widely known and respected for the good works they carry on.

Please Congressman Wirth and Congressman Miller, reconsider your involvement in a matter which should be taken care of solely in the Guyanese court room without intervention from any outside forces.

Sincerely,

Gloria Davis

cc: President Carter

Nest President of Black
Teachers Caucus of S.F.

x-4-i-20

1405 Shrader Street
San Francisco, CA 94117

February 18, 1978

Congressman Timothy Wirth
#312 CHOB
and
Congressman George Miller
#1531 LHOB
Washington, D.C. 20515

Dear Gentlemen:

As a rank and file trade unionist in San Francisco and other cities for many years, I am very well acquainted with Rev. Jim Jones and his activist church, Peoples Temple. That this church, over a span of two decades, has successfully reached thousands of troubled youth as well as disenfranchised and needy senior citizens, can only be attributed to the man's deep commitment to justice and an egalitarian society. His efforts have resulted in a highly acclaimed agricultural project in Guyana, South America, where hundreds of once incorrigible youth from the inner cities of the United States are now living productive lives, growing and harvesting food for hungry people -- of whom there are so many in that part of the world.

Despite the visits of international delegations from many Third World and other developing nations, from top officials in the United States Department of State, all of whom have left the project highly impressed, there have been some unfortunate attempts on the part of certain detractors to try to interfere with the progress there.

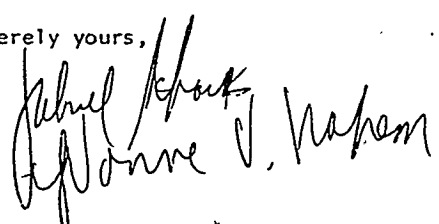
Namely, a Mr. Timothy Stoen, has been trying to swing the opinion of the courts in Guyana to his side of a custody case that is being tried there now. To do this, he has evidently encouraged members of Congress and the State Department of our country to take an adversary role in the issue. If this is the case, I am disappointed with our governmental officials. Recognizing that Guyana is an independent and sovereign nation, and has a legitimate complaint if the United States intrudes in matters that are the country's own internal affairs, I urge you not to endorse any sort of pressure that Mr. Stoen is trying to bring to bear on the Guyanese government or courts.

Thank you. I remain sincerely yours,

Gabriel Schack

Yvonne V. Nahem

cc: Mr. Frank Tumminia
Pres. Carter



x-4-i-21

Potrero Hill Neighborhood House
953 DeHaro Street
San Francisco, California 94107

February 15, 1978

Rep. George Miller
U.S. Congress
#1531 LHOB
Washington, D.C. 20515

Dear Mr. Miller:

I have known Rev. Jim Jones of the Peoples Temple for ten years. During this time I have never known him once to refuse to help anyone in need, regardless of race, color, or creed.

He has always believed in lighting a candle rather than cursing the darkness, and his work here in San Francisco and the Bay Area, as well as his devotion to the people and mission in Guyana, are the mark of a man who has devoted his whole life to the service and welfare of humankind.

I am thus dismayed to learn that another round of attacks has been levelled against him -- although I understand that Jesus Christ and Martin Luther King, among many others throughout history, have suffered condemnation and persecution during their lifetimes for wanting nothing more than a better life for the downtrodden.

If you have been used and misled by a detractor in any way who is trying to hinder the work of Rev. Jones and Peoples Temple in their Jonestown agricultural mission, which is making such strides in resource and human development and building a bridge of friendship between Guyana and the United States, I am very sad. Because if such a beautiful work for the people could just be left alone to develop in peace, the world would see a candle of hope become a flame of inspiration for others to follow. All of us have much to learn about living together in racial and economic equality as the Peoples Temple is doing.

I implore you to withdraw any commitment you have or may have made inadvertently on behalf of one who is bent on throwing the work of peacemakers to the wind and who may well be receiving money to do it.

Sincerely yours,

Enola D. Maxwell
Enola D. Maxwell, Executive Director

cc: Congressman T. Wirth
President Jimmy Carter

x-4-i-22

□ SACRAMENTO OFFICE
STATE CAPITOL
SACRAMENTO, CALIFORNIA 95814
(916) 443-8077
DISTRICT OFFICE
840 VAN NESS AVENUE
SAN FRANCISCO, CALIFORNIA 94102
(415) 837-0784

Assembly California Legislature

CHAIRMAN
REVENUE AND TAXATION
COMMITTEE
COMMITTEES
HOUSING AND COMMUNITY
DEVELOPMENT

WILLIE L. BROWN, JR.
MEMBER OF THE ASSEMBLY, 17TH DISTRICT
SAN FRANCISCO

February 27, 1978

The Honorable Jimmy Carter
The President of the United States
The White House
1600 Pennsylvania St.
Washington D.C.

Dear President Carter:

It is an honor for me to write on behalf of Rev. Jim Jones, a rare human being and leader of the first order. He has been unjustly maligned in recent months, but is presently undertaking a remarkable agricultural mission in Guyana, South America, the reality of which flies in the face of all its detractors. Rev. Jones, more than any other minister the Bay Area has seen, did wonders for this community in terms of tackling ingrained social problems, such as drug abuse, crime, and unemployment. I have no doubt that his inspirational leadership is motivating the Peoples Temple members in Guyana to even greater achievements now that they are established on their own territory free from the tensions and hinderances of urban life.

As a leader within the minority community of San Francisco and of the State of California, I can speak to the tireless efforts Jim Jones extended to virtually everyone in need of assistance when he was a resident of our city. The Third World community knows and respects him well. A man this noteworthy for his high principles, ceaseless work, and extraordinary ability to motivate others is surely the best representative our country could hope to have in the emerging Third World nation of Guyana. I have confidence that Jim Jones' community can only reflect well upon both America and the Guyanese.

x-4-i-23

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Vice Chairperson:
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District 5

BOARD OF SUPERVISORS

CITY HALL, SAN FRANCISCO 94102

February 19, 1978

SUPERVISOR HARVEY MILK

President Jimmy Carter
The White House
Washington, D.C. 20500

Dear President Carter:

I am the Supervisor for District Five in the City of San Francisco. The Peoples Temple Christian Church is not located in my District, so I have no political ties or obligations to this church. I am writing to call an urgent concern of theirs to your attention. I am concerned at what I understand is the endorsement of some of our Congressmen for the efforts of Timothy Stoen against Rev. Jim Jones and the Peoples Temple. There are some facts I feel you should be informed of:

Rev. Jones is widely known in the minority communities here and elsewhere as a man of the highest character, who has undertaken constructive remedies for social problems which have been amazing in their scope and effectiveness. He is also highly regarded amongst church, labor, and civic leaders of a wide range of political persuasions. Our own Board of Supervisors has presented Rev. Jones with a Certificate of Honor, unanimously passed by all members, praising the church for its many projects "which have been so beneficial to all the citizens of the Bay Area." On the same occasion, he was also presented with a unanimously passed resolution by a Republican State Senator, Milton Marks representing that legislative body.

Timothy and Grace Stoen, the parties that are attempting to damage Rev. Jones' reputation, and seriously disrupt the life of his son, John, have both already been discredited in the news media here. The most widely-read columnist in the area, Herb Caen, printed Mr. Stoen's sworn testimony that John is not his child but rather Rev. Jones. Grace Stoen is reported involved in what could be considered a blackmail attempt against another leader in the minority community, Dennis Banks, reported in the two major dailies with her name also given in Mr. Banks' sworn affidavit about the attempt.

It is outrageous that Timothy Stoen could even think of flaunting this situation in front of our Congressmen with apparently bold-faced lies. I have learned in addition, that he has pressured these Congressmen towards unwitting compliance with promoting State Department intervention in the custody case now pending in Guyana.

Not only is the life of a child at stake, who presently has loving protective parents in Rev. and Mrs. Jones, but our official relations with Guyana could stand to be jeopardized, to the potentially great embarrassment of our State Department.

Mr. President, the actions of Mr. Stoen need to be brought to a halt. It is offensive to most in the San Francisco community, and all those who know Rev. Jones to see this kind of an outrage taking place.

Respectfully,

Harvey Milk

cc: Rep. John Burton; Rep. Phillip Burton; Lt. Gov. Mervyn Dymally

x-4-i-24

Peoples Temple sues ex-member for \$150 million

By K. Connie Kang

Peoples Temple is suing a former church member, Timothy Stoen, for \$150.5 million.

And, Stoen, who is in private legal practice here, says he is "delighted."

In a Superior Court suit filed yesterday by lawyer Charles Garry, Peoples Temple and two members claimed that Stoen had violated attorney-client privilege by using the information he gained as a lawyer for the church to represent former church members in bringing legal actions.

The suit said Stoen served as chief legal counsel for the church from 1970-77.

But Stoen said that's not true. "The attorney for the church was Eugene Chalkin."

Stoen said the latest suit "shows that Jimmy Jones and Charlie Garry are very frightened about the truth behind the lawsuits (Stoen has filed), and they're afraid to take the suits on the merits."

The Peoples Temple suit against Stoen claimed that Stoen's son, Victor, 4, who is in Guyana, South America, was sired by Jones, leader of the church, also in Guyana.

It claimed that a custody battle between Stoen, his ex-wife, Grace Stoen, and Jones had "engendered feelings of great bitterness and hostility" in Stoen and made him turn against the church.

"As a result of the bitterness and hostility engendered by this custody battle, defendant (Stoen) began a personal vendetta against Jones, the temple, its directors and officers and all of its members," the suit said.



Examiner

TIMOTHY STOEN
Says he is 'delighted' about it

x-4-i-25

San Francisco Chronicle 3
Tues., July 11, 1978

Peoples Temple Sues Ex-Counsel

The Peoples Temple sued former San Francisco Assistant District Attorney Timothy Stoen yesterday for \$150.5 million, accusing him of misusing confidential information obtained when Stoen represented the church.

Stoen, now an attorney in private practice here, said he "welcomed" the litigation, although he denied the charges made in the suit filed in San Francisco Superior Court.

"It shows that (the Rev.) Jim Jones (head of Peoples Temple) and Charles Garry (attorney for the church) are very frightened about the public learning the truth through my lawsuits," Stoen said.

Since leaving Peoples Temple, Stoen has filed three lawsuits on behalf of former church members who claim that Jones and the church violated their legal rights and obtained money or property from them under false pretenses.

All three suits are mentioned in the litigation filed yesterday by Garry on behalf of Peoples Temple.

The three suits filed by Stoen followed media reports last year claiming that Jones compelled followers to turn over cash and real estate to the church, ordered beatings of church members and faked medical cures.

After the accounts became public, Jones and some 1100 followers moved from their San Francisco base to a jungle farm in Guyana in South America. Church leaders have denied the media charges against Jones.

Peoples Temple Sues Ex-Counsel for Millions

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While Stoen was on the Mendocino district attorney's staff from 1970 to 1976, and an assistant district attorney in San Francisco from 1976 to 1977, the temple lawsuit said, he also was Peoples Temple's chief legal adviser.

Since falling out with Jones and leaving the church, the lawsuit said, Stoen has used the confidential information obtained from his former client to file litigation against it.

The suit asks for \$30 million in general damages, \$100 million in punitive damages for Peoples Temple, and a \$500,000 legal fee for Garry.

x-4-i-26

GARRY, DREYFUS, McTERNAN, BROTSKY,
HERNDON & PESONEN, INC.
1256 MARKET STREET AT CIVIC CENTER
SAN FRANCISCO, CALIFORNIA 94102
TEL: 864-3131

1 CHARLES R. GARRY, ESQ.
2 GARRY, DREYFUS, McTERNAN, BROTSKY,
3 HERNDON & PESONEN, INC.
4 1256 Market Street at Civic Center
5 San Francisco, California 94102
6 Telephone: 864 3131

7 Attorneys for Plaintiffs

ENDORSED
FILED
JUL 10 1978

CARL J. Clerk
BY RICHARD F. METTER
Deputy Clerk

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

10
11 PEOPLES TEMPLE OF THE DISCIPLES OF
12 CHRIST, a nonprofit corporation,
13 JEAN F. BROWN, and JAMES McELVANE,

14 Plaintiffs,

15 vs.

16 TIMOTHY OLIVER STOEN,

17 Defendant.

740531

NO.

COMPLAINT FOR TEMPORARY
RESTRAINING ORDER,
PRELIMINARY AND PERMANENT
INJUNCTIONS, AND DAMAGES
[C.C. §§3333, 3422;
C.C.P. §§526, 527]

18
19 Plaintiffs allege:

20 I

21 Plaintiff PEOPLES TEMPLE OF THE DISCIPLES OF CHRIST,
22 hereinafter "PEOPLES TEMPLE," is, and at all times mentioned
23 herein was, a nonprofit corporation organized and existing under
24 and by virtue of the laws of the State of California, with its
25 principal place of business in the City and County of San
26 Francisco. Plaintiffs BROWN and McELVANE are individuals and

x-4-i-27

GARRY, DREYFUS, ASTERNAN, BROTSKY,
HERNANDO PESONEN, INC.
1116 MARKET STREET AT CIVIC CENTER
SAN FRANCISCO, CALIFORNIA 94102
TEL. 864-3131

1 are members of plaintiff PEOPLES TEMPLE.

2 II


3 Defendant is, and at all times mentioned herein was,
4 an attorney at law with his office in the City and County of
5 San Francisco.

6 III

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

19 IV

20 During his years as legal counsel to plaintiff PEOPLES
21 TEMPLE, and in the course of the attorney-client relationship
22 between plaintiff PEOPLES TEMPLE and defendant, defendant
23 acquired an intimate knowledge of the confidential affairs of
24 each of the plaintiffs. Defendant obtained confidential
25 information concerning all aspects of plaintiff PEOPLES TEMPLE's
26 organization, finances, real estate transactions, methods of

 84 - 4286 - 2018

GARRY, DREYFUS, McTERNAN, BROTSKY,
HERNDON, SONEN, INC.,
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TEL. 864-3131

1 operation, and relationships with members, former members, and
2 relatives of members.

3 V

4 In his capacity as legal counsel for plaintiff PEOPLES
5 TEMPLE, defendant planned, guided and arranged various real
6 estate transactions between it and its members. In particular,
7 defendant planned, advised and arranged the transfer of certain
8 real property in the County of Los Angeles from Wade B. Medlock
9 and Mabel M. Medlock to plaintiff PEOPLES TEMPLE.

10 VI

11 In his capacity as legal counsel for plaintiff,
12 defendant counseled and advised members of plaintiff PEOPLES
13 TEMPLE concerning possible legal problems that might arise as
14 a result of the hostility of some of their relatives to plaintiff
15 PEOPLES TEMPLE. In particular, he advised member Maria Katsaris
16 concerning possible legal problems that might arise because of
17 her father's hostile attitude toward plaintiff. During the course
18 of his consultations with Maria Katsaris, as attorney for
19 plaintiff PEOPLES TEMPLE, defendant obtained confidential
20 information concerning her relationship with her father, STEVEN
21 A. KATSARIS, and certain sexual advances made by her father
22 towards her when she was a child. In April or May, 1977;
23 defendant advised plaintiff PEOPLES TEMPLE and Maria Katsaris
24 that she should go to Guyana to avoid the possibility of her
25 father's instituting conservatorship proceedings against her and
26 that, in the event her father should pursue her to Guyana, the

GARRY, DREYFUS, MCERNAN, BROTSKY,
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1333 MARKET STREET AT CIVIC CENTER
SAN FRANCISCO, CALIFORNIA 94102
TEL. 864-3131

1 sexual advances towards her by her father should be made public.

2 VII

3 In February 1977 defendant STOEN joined Reverend Jim
4 Jones and the Peoples Temple commune in Guyana, South America.
5 In September 1976 defendant had sent John Victor Stoen, a four
6 year old boy born to defendant's ex-wife, Grace Stoen, there.
7 Defendant had previously admitted, in an affidavit signed
8 in 1972, that this child was the son of Jim Jones. In that
9 affidavit defendant stated that he had asked Jones to sire
10 a child for him because he had not been able to do so
11 himself and, in his admiration and respect for Jones, wanted
12 him to father the child. See Exhibits C-1, C-2 and C-3,
13 attached hereto.

14 VIII

15 During the period in which defendant was a member of
16 and legal counsel for PEOPLES TEMPLE, he appeared and said he was
17 devoted to the PEOPLES TEMPLE and its cause, and to its Pastor,
18 the Reverend Jim Jones. As late as August 1977, he stated
19 that he had esteem for Jones and that Jones helped him to develop
20 an empathy toward the persecuted. As a result defendant said
21 that he intended to develop a national law firm to help people
22 who are prosecuted on some pretext, for their religious beliefs.
23 At that time, defendant STOEN threatened to file a libel suit
24 against New West Magazine and the Mendocino Grapevine because of
25 various allegations against the PEOPLES TEMPLE and STOEN
26 that appeared in those publications. See Exhibits A and B

GARY, DREYFUS, McTERNAN, BROTSKY,
HERNANDO, PESONEN, INC.
1235 MARINET N. AVENUE AT CIVIC CENTER
SAN FRANCISCO, CALIFORNIA 94102
TEL: 864-3131

1 attached hereto.

2 IX

3 In August 1977, while still counsel for the plaintiff,
4 a custody battle ensued between defendant, his ex-wife Grace
5 Stoen, and the Reverend Jim Jones. This battle was accompanied
6 by a great deal of publicity. In February 1978 defendant STOEN
7 claimed to have spent over \$18,000 in the attempt to return the
8 boy to Grace Stoen. See Exhibit D, attached hereto. During this
9 battle the affidavit described in Paragraph VII, supra, was
10 made public.

11 X

12 The battle described in Paragraph IX, supra, engendered
13 feelings of great bitterness and hostility in defendant STOEN,
14 directed towards Jim Jones, the PEOPLES TEMPLE, and all of its
15 directors, officers and members. As a result of the bitterness
16 and hostility engendered by this custody battle, defendant began
17 a personal vendetta against Jones, the Temple, its directors and
18 officers and all of its members, including plaintiffs herein.
19 The actions described in the following paragraphs of this
20 Complaint were all taken as a part of this personal vendetta.

21 XI

22 Defendant has solicited and continues to solicit, and
23 has accepted and continues to accept, employment which is
24 adverse to the interests of plaintiffs and each of them, and
25 in the course of that solicitation and employment has used and
26 continues to use confidential information received during the

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1 course of his attorney-client relationship with plaintiff PEOPLES
2 TEMPLE.

3 XII

4 On May 22, 1978 defendant filed a complaint for
5 compensatory and punitive damages for libel on its face and for
6 slander, in the Superior Court of the State of California in and
7 for the County of Mendocino, Civil Action #39911, on behalf of
8 Steven A. Katsaris, against, among others, plaintiff PEOPLES
9 TEMPLE. The allegations of that complaint concern the relation-
10 ship between Maria Katsaris and her father, Steven A. Katsaris,
11 and various statements allegedly made concerning that
12 relationship. See Exhibit E attached hereto.

13 XIII

14 On June 7, 1978, defendant filed a complaint for
15 compensatory and punitive damages for conversion based on
16 coercion and for intentional infliction of emotional distress,
17 in the Superior Court of the State of California in and for the
18 County of Los Angeles, Civil Action #243292. That complaint
19 was filed on behalf of Wade B. Medlock and Mabel M. Medlock
20 against, among others, plaintiffs PEOPLES TEMPLE and McELVANE.
21 The subject matter of that action is the real estate transaction
22 referred to in Paragraph V, supra. See Exhibit F attached hereto.

23 XIV

24 On June 22, 1978 defendant filed a complaint for
25 compensatory and punitive damages for intentional infliction of
26 emotional distress and for libel on its face, in the Superior

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1 Court of the State of California in and for the City and County
2 of San Francisco, Civil Action #739907. That complaint was
3 filed on behalf of James Cobb, Jr., against, among others,
4 plaintiffs PEOPLES TEMPLE and BROWN. The allegations of that
5 complaint concern various incidents about which defendant
6 obtained confidential information during the course of his
7 attorney-client relationship with plaintiff PEOPLES TEMPLE.
8 See Exhibit G attached hereto.

9 XV

10 Defendant utilized confidential information obtained
11 during the course of his attorney-client relationship with
12 plaintiff PEOPLES TEMPLE in drafting the complaints described
13 in Paragraphs XII-XIV supra, and will continue to use such
14 confidential information in the prosecution of those actions
15 unless and until he is enjoined by court order from so doing.

16 XVI

17 Defendant's wrongful conduct, as alleged in the
18 preceding paragraphs of this Complaint, unless and until enjoined
19 and restrained by order of this Court, will cause great and
20 irreparable injury to plaintiffs and each of them in that each
21 of their reputations will be damaged by the publicity generated
22 by suits brought against them by defendant in the course of his
23 campaign of harassment and persecution, plaintiffs and each of
24 them will be forced to spend countless hours in the defense of
25 these suits, and plaintiffs and each of them will be prejudiced
26 in the defense of these actions by defendant's wrongful and

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1 illegal use of confidential information in his prosecution of the
2 suits. Plaintiffs and each of them will be further irreparably
3 injured by the fact that confidential information concerning
4 them is being made public by defendant.

5 XVI

6 Plaintiffs and each of them have no adequate remedy
7 at law for the injuries currently being suffered and which will
8 continue to be suffered unless and until plaintiff is enjoined
9 from his wrongful conduct, since it will be impossible for
10 plaintiffs or any of them to ascertain the precise amount of
11 damage which will be suffered if defendant's wrongful conduct
12 is not enjoined, and since, if defendant is not enjoined,
13 plaintiffs and each of them will be forced to institute a
14 multiplicity of suits to obtain adequate compensation for their
15 injuries.

16 XVII

17 As a proximate result of defendant's wrongful conduct
18 plaintiff PEOPLES TEMPLE has been damaged in the sum of
19 \$50,000,000.00 due to damage to its reputation and in the sum
20 of \$500,000.00 in attorneys' fees. Plaintiffs, and each of
21 them, will be further damaged in like manner so long as defendant's
22 conduct continues. The full amount of such damages is not now
23 known to plaintiffs, or to any of them.

24 XVIII

25 Defendant did the things herein alleged with intent to
26 harass and oppress plaintiffs and each of them, and such acts

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1 were done maliciously and oppressively. Plaintiffs, and each
2 of them, are therefore entitled to punitive damages in the sum
3 of \$100,000,000.00.

4 WHEREFORE, plaintiffs, and each of them, pray judgment
5 against defendant as follows:

6 1. For an order requiring defendant to show cause,
7 if any he has, why he should not be enjoined as hereinafter
8 set forth, during the pendency of this action;

9 2. For a temporary restraining order, a preliminary
10 injunction, and a permanent injunction, all enjoining defendant
11 and his agents, servants, and employees, and all persons acting
12 under, in concert with, or for them from:

13 a. Soliciting professional employment from
14 ex-members of PEOPLES TEMPLE, relatives of members of PEOPLES
15 TEMPLE, or from any other persons for the purpose of generating
16 suits against plaintiffs or any of them or against any officers,
17 directors, or members of plaintiff PEOPLES TEMPLE;

18 b. Accepting professional employment adverse to
19 his former client PEOPLES TEMPLE or to any directors, officers
20 or members of PEOPLES TEMPLE, including all plaintiffs herein,
21 during the course of which employment he will have or might have
22 occasion to use any confidential information obtained during
23 the course of the attorney-client relationship between defendant
24 and PEOPLES TEMPLE.

25 c. Disclosing under any circumstances any
26 confidential information obtained during the course of the

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1 attorney-client relationship between defendant and PEOPLES TEMPLE,
2 and between defendant and any officers, directors or members
3 of PEOPLES TEMPLE, including all plaintiffs herein, unless such
4 disclosure is with the written consent of the PEOPLES TEMPLE.

5 d. Prosecuting any complaint already filed, which
6 was filed in violation of the attorney-client privilege or the
7 prohibition against accepting employment adverse to a former
8 client, during the course of which the defendant will have,
9 or might have, occasion to use any confidential information
10 obtained during the course of the attorney-client relationship
11 between defendant and PEOPLES TEMPLE.

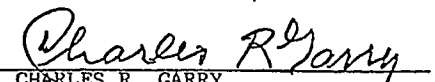
12 3. For damages in the sum of \$50,500,000.00 plus
13 damages in such further sums as may be sustained and as are
14 ascertained before final judgment herein;

15 4. For punitive damages in the sum of \$100,000,000.00;

16 5. For costs of suit herein incurred; and

17 6. For such other and further relief as the Court
18 deems proper.

19 Dated: July 3, 1978.

20
21 
22 CHARLES R. GARRY
23 Attorney for Defendants
24
25
26

I Frances R. Muchnick, declare under penalty of perjury that the following is true and correct:

On Sunday, the 7th of May, 1978 around 7:30 p.m., I received the following phone call from a Mr. Timothy Stoen:

TS - Mrs. Frances Muchnick? I don't know whether you remember me or not, but I met you some years ago at the People's Temple Church in Redwood Valley, and I'm calling to let you know of a mass Protest Meeting to be held in front of the Federal Building in San Francisco on Wednesday, May 10th.

FI - What kind of meeting?

TS - We are a group of 25 parents who have children or relatives in the Agricultural Mission in Guyana, and they are being held there incommunicado. There is no way we can reach them by phone or radio or get to see them. Five parents have traveled to Guyana and came back without seeing their children. I understand that your children and grandchildren are there also.

FI - Yes, my grandchildren are there, and my son-in-law is there, but my daughter Claire is still here in Redwood Valley. By the way, how did you ever get my number to call me?

TS - Oh, I didn't know that Claire was still in Redwood Valley, - I got your number from Mr & Mrs Janaro, at 763-4119, and they asked me to call you. They wanted you to know what was going on.

FI - Did you know my Claire and Richard?

TS - Oh yes, very well. I was as dedicated a worker for the Temple as they are, five years ago. But then I began thinking that things were not going exactly as I had contemplated they would, because the more power that Jim Jones possessed, the more he wanted to use. I tried to break away from the church two times - I went as far as London to get away from it all, and try to think things out clearly for myself - but Jim sent someone after me and begged me to come back. I decided to give it another try. For some reason, I was told to sign a paper saying that Jim was the father of my child (TS didn't say what the reason was), and now I want my child back. I have a suit going in the Guyanese courts.

FI - Have you ever been to Guyana?

TS - Yes, I spent about 3 months there.

FI - What did you find there?

TS - It was a very beautiful spot - and good food - a little starchy, but good. When I was there, there were only about 75 people there, and now there are about a 1000. So I don't really know what the conditions are there now.

FM - I understand that Jonestown is in a remote region and difficult to get to.

TS - The difficulty was in getting out of there, once you get in - Now, no one can leave. The mail is definitely censored in Jonestown. I know that first hand.

FM - If the people in Jonestown are being held captive or against their will, how come you don't go to the government for help in getting them released?

TS - Oh, I did. I spent two weeks in Washington, trying to get through some of the bureaucracy there - trying to get people to listen to me. I spoke to (or ~~THE~~, meaning the group) Prime Minister Burnham about investigating Jonestown.

FM - Do you know Lt. Governor Dymally?

TS - Very well. In fact, he was on the plane with me when I went to Guyana.

FM - Well, it is my understanding that Lt. Gov. Dymally was very favorably impressed with what he found there, and came back full of enthusiasm with the progress and the life style program that they are accomplishing in Jonestown.

TS - He was very impressed at that time, but we have been talking to him and he is weakening in his opinion of Jonestown since we have been informing him and putting on some pressure. Jim Jones is a master at mind control, is power mad, it has gone to his head, - is paranoid and can't take criticism of any kind. Claire and Richard are completely under the influence of Jim, are very loyal to him and would do anything he asked - Claire would even kill someone if he asked her to.

FM - I have complete confidence in the intelligence of Claire and Richard and their ability to judge what is right for them and their children!

TS - People are afraid to come forth and expose Jim and the Jonestown situation for fear of retaliation by Jim or his henchmen - several people were threatened that their homes would be burned, - but when they came forth - nothing really happened to them or their homes.

FM - Have you ever witnessed any physical violence against members of the church, or anyone who tried to leave the church?

TS - When I was a member I saw, (I think he said Jim) paddle people as punishment.

TS - I just wanted to let you know what we are trying to do. We are asking Jim to please let our children come back here for one week (at our expense) so that we can see them again, and let them decide for themselves whether they want to return to Jonestown or not. If they decide that they want to return to Jonestown, we will send them back.

- Well, that sounds like a fair enough request.

- 3 -

TS - Also want to let you know that Jim wrote letters to all of our Senators and Congressmen, saying that he would rather die than be harassed from continent to continent. Jim has strayed so far from the original concept of a better world to live in, - is so inflated by his power, that if things don't go Jim's way, Jim could get his followers to partake in a mass suicide action if he so decreed.

TS - If you want to reach me for any reason, or any further information as to the progress of the group, feel free to call me at my law office in San Francisco, on Montgomery Street. The number is 391-5020.

FI - Are you calling me from Los Angeles.

TS - No, I'm calling from San Francisco

FI - This really is a long toll call. I want to thank you for calling me and telling me about your group, but I still have all the confidence in the world in the judgement of Claire and Richard.

The above pieces of conversation may be out of sequence, but considering the emotional duress I was going through hearing all of these things, and knowing that they are out to destroy this miraculous achievement by a group of valiant and courageous people under the leadership of a man they dearly love and respect, Jim Jones, - the above is as near as I can recollect - it may not be verbatim, but it is to the best of my knowledge and memory.

Executed on May 8th, 1978 at Los Angeles, California.


FRANCES R. MUCHNICK

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« Mr Timothy Stoen telephoned me at my home May 7, 1978 — explained to me that he wants to reach as many people as possible to talk about Jim Jones. He went on to say that he was with Jim Jones a few years and claims he discovered that he is going insane and is a power maniac, and that Jim Jones wants to get control of thousands of adults and children, not only brain washing them but removing all their personal belongings and finances also their Passports so that it would be impossible for anyone to get away or come home if they want to. Also he threatens them with armed guards all around their village in order that no one could get out — also. I shoot any one if necessary. No outside relatives or parents are permitted to come to see anyone under any circumstances.

Mr. Stoen claims he is getting as many people as possible to sign a petition. Also if the petition is large enough that claims can be brought against Jim Jones; that the Prime Minister of Guyana will step in with the Law, and help to free all the adults and children.

Mr. Stoen claims that in the brainwashing his colony ^{Jim Jones} he is telling them that America is full of fascist and Political forces to destroy them and they must forget about coming back to America.

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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTION

- I. PLAINTIFFS ARE ENTITLED TO A PRELIMINARY INJUNCTION TO
PRESERVE THE STATUS QUO PENDING A DETERMINATION OF THE
MERITS OF THIS ACTION.

In determining whether to grant a preliminary injunction
the trial court must balance the equities and determine which party
is more likely to be injured by the exercise of its discretion.
The discretion must then be exercised in favor of that party.
Continental Bakery Co. v. Katz, 68 Cal. 2d 512 at 528 (1968);
California State Univ., Hayward v. National Collegiate Athletic
Ass'n., 47 Cal. App. 3d 533 at 544 (1975).

In the above-entitled case the equities are clearly
on the side of plaintiff. The facts, as set forth in the
Complaint and in the Declaration of Carol Stahl, show that
defendant STOEN is engaged in a personal vendetta against
plaintiff PEOPLES TEMPLE, the Reverend Jim Jones, and all of the
other plaintiffs herein. In the course of that vendetta he has
solicited, and continues to solicit, professional employment
adverse to his former clients, plaintiffs herein, in the course
of which he has disclosed, and will continue to disclose,
confidential information obtained during the course of his
attorney-client relationship with plaintiffs. This conduct is
prohibited by California Business and Professions Code Section
6068(e), which states:

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1 It is the duty of an attorney: . . .
2 (e) To maintain inviolate the confidence, and
3 at every peril to himself to preserve the secrets,
4 of his client.
5 The conduct engaged in by defendant and described in the
6 Complaint and Declaration of Carol Stahl in the within-entitled
7 case is also prohibited by California State Bar Rules of
8 Professional Conduct, Rules 2-101, 2-110, and 4-101. Rule 2-101
9 states in pertinent part:
10 A member of the State Bar shall not solicit
11 professional employment by advertisement or
12 otherwise.
13 Rule 2-110 states:
14 A member of the State Bar shall not accept
15 employment to accomplish any of the following
16 objectives, nor shall he do so if he knows
17 or should know that the person who employs
18 him wishes to accomplish any of the following
19 purposes:
20 (1) Bring a legal action, conduct a defense,
21 or assert a position in litigation, or other-
22 wise take steps, solely for the purpose of
23 harassing or maliciously injuring any person
24 or to prosecute or defend a case solely out
25 of spite.
26 (2) Present a claim or defense in litigation
that is not warranted under existing law, unless
it can be supported by good faith argument for
an extension, modification or reversal of
existing law.
(3) Take or prosecute an appeal solely for
delay, or for any other reason not in good
faith.
Rule 4-101 states:
A member of the State Bar shall not accept
employment adverse to a client or former
client, without the informed and written consent
of the client or former client, relating to a
matter in reference to which he has obtained
confidential information by reason of or in

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1 the course of his employment by such client
2 or former client.

3 An attorney is forbidden to do either of two things
4 after severing his relationship with a former client. He may
5 not do anything which will injuriously affect his former client
6 in any matter in which he formerly represented him nor may he
7 at any time use against his former client knowledge or information
8 acquired by virtue of the previous relationship. Wutchumma Water
9 Co. v. Bailey, 216 Cal. 564 at 573 (1932); Sheffield v. State Bar,
10 22 Cal. 2d 627 at 630 (1943); Earl Scheib, Inc. v. Superior Court
11 of Los Angeles County, 253 Cal. App. 2d 703 at 706.

12 The courts have interpreted these rules to forbid
13 subsequent representation of another against a former client
14 not merely when the attorney will be called upon to use
15 confidential information obtained in the course of the former
16 employment, but in every case when, by reason of such subsequent
17 employment, he may be called upon to use such confidential
18 information. Galbraith v. State Bar, 218 Cal. 329 at 332-333
19 (1933); Sheffield v. State Bar, supra at 630; Earl Scheib, Inc.
20 v. Superior Court of Los Angeles County, supra at 707.

21 The injunction sought herein seeks only to restrain
22 defendant from engaging in conduct which is clearly prohibited
23 by Business and Professions Code Section 6068(e) and Rules
24 2-101, 2-110, and 4-101 of the State Bar Rules of Professional
25 Conduct, as those Rules have been interpreted by the California
26 Supreme Court. This restraint is necessary to prevent further

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1 damage to plaintiffs from defendant's disclosure of confidential
2 information and the adverse publicity generated by that disclosure.
3 The injunction is also necessary to protect the plaintiffs from
4 the necessity of defending themselves against suits filed only
5 as a result of the unethical conduct of defendant.

6 The purpose of a preliminary injunction is to preserve
7 the status quo pending the final determination of the merits of
8 the action. Continental Bakery Co., supra at 528; United States
9 Hertz, Inc. v. Niobrara Farms, 41 Cal. App. 3d 68 at 79 (1974).
10 Such preservation is obviously crucial in this case. Defendant
11 filed three suits in the course of the thirty day period between
12 May 22 and June 22, 1978. If he is not restrained by court order,
13 he will continue to solicit adverse employment and to file
14 suits against plaintiff, all to the detriment of plaintiff's
15 reputation, and to their damage through the disclosure of
16 confidential information, and the expenditure of time, money and
17 energy in defense of these suits. The status quo can be
18 preserved only by the issuance of the court order requested herein.

19
20 II. PLAINTIFFS ARE ENTITLED TO A TEMPORARY RESTRAINING ORDER,
21 BECAUSE PLAINTIFFS WILL SUFFER IRREPARABLE INJURY UNLESS
22 DEFENDANT IS RESTRAINED BY COURT ORDER, PENDING A
HEARING ON THIS MATTER, FROM THE ACTIONS COMPLAINED OF
HEREIN.

23 C.C.P. §527(a) provides that a temporary restraining
24 order may be granted without notice where great or irreparable
25 injury would result to the applicant before the matter can be heard
26 on notice.

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1 Defendant in this case is involved in a personal
2 vendetta against plaintiffs. In the course of this vendetta
3 he has already filed three suits against plaintiffs and has
4 disclosed much confidential information concerning plaintiffs.
5 Only one of these complaints has been served upon any of the
6 plaintiffs to this date. But if defendant is not immediately
7 restrained from proceeding with the vendetta pending a hearing
8 on this matter, he may succeed in serving plaintiffs with the
9 remaining two complaints, which will generate further damaging
10 publicity. If not restrained, he may also disclose further
11 confidential information and file further suits, all to the
12 irreparable injury of plaintiffs and each of them, as described
13 above and in the Declaration of Stahl.

14 CONCLUSION

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17 For all of the reasons stated above, plaintiffs
18 respectfully request that the Temporary Restraining Order
19 and the Order to Show Cause attached hereto issue forthwith.
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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 3, 1978.

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13
14 *Carol Stahl*
15 CAROL STAHL
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