

8/29/78

TO: WARETT TROPP
FR: ✓ BOB ORSOT
RE: DIM STEEN

SINCE IT WAS REQUESTED
LAST NIGHT FOR EVERYONE
WHO HAD RECEIVED
LEGAL ADVICE TO SUBMIT
THEIR NAMES, I THOUGHT
IT WOULD BE BEST FOR
ME TO REVIEW THE
ENTIRE LIST + PICK
OUT WHICH CASES ARE
RELEVANT TO THE
TIME I WAS IN THE
LAW OFFICE.

OTHER POINTS WHICH
I FEEL MAY BE IM-
PORTANT ARE AS FOLLOWS:

(1) APOSTOLIC CORPORATION
(SEE TISH)

(2) CONSCIENTIOUS
OBJECTOR CASES,
SPECIFICALLY, HE
HELPED MY SON, ANTONIO
HARVEY, GET THAT
STATUS WHEN I FIRST
CAME IN CHURCH IN
1970.

(3) CHRIS LEWIS FF-2-1A
OVER ~~REDACTED~~

- ④ IRS, FBI.
ADVICE SOUGHT ON
OUR OBTAINING FILES
ON PT & JIM JONES
UNDER FREEDOM
OF INFORMATION
ACT.
- ⑤ I THINK HE WAS
INVOLVED IN A VISIT
TO A PLACE LIKE
"MISSION IMPOSSIBLE"
BY US. DONT KNOW
IF THIS IS REVELANT.
NOT WORKING IN LAW
OFFICE. UNFAMILIAR
- ⑥ PEOPLE'S FORUM
- ⑦ JOHN BROWN
ADOPTION BY JIM &
MARCI
- ⑧ Release Things
- ⑨ Lois Rantz
~~Real estate~~
Child custody
- ⑩ Debbie Evans
~~Registration~~
Wrong leg
- ⑪ MELISSA JACKSON

FF-2-1B

FF-2-1B

Row 9

W.

Affidavit of Hamed Thors

I am a graduate of Northwestern College of the Liberal Arts U.C. Berkeley. I am 20 years old. I have been a member of the PTA since 1970. During the latter part of 1972, I was a third

Our problem / major concern was the possibility of
loosebills being caught against some of our young
people, including Dick. We did ^{lead} research on this matter
obtained copies of court records, and thoroughly reviewed
all the same, PDS prevailing. We denied the
charge / made good / likely subject for such attack, and
PDS denied the NK case which is what he was
facing. Shortly thereafter PDS made a report
on the whole incident a check book meeting
PDS would continue till he left for Guyana in Feb of
1977.

A week or so before the end of April in Georgetown, Guyana, where T. had gone with E.C. for a legal conference that he had signed T.O.S. E.C. was off T.A. for 1/2 hr. was there. We thoughtfully denied the Communist's since Tim again remarked that MK. go down to Guyana to avoid publicity and that if need be, ~~the~~ ^{the} Minister in the Church would publicize. Shekharan (Minister in Father) indication of MK. in order to help against any attack by S.K. He said he was not concerned with any sort of suit because he believed S.K. would not be willing to be convicted. FF-2-48 FF-2-48-1

9/2/20

2003 by the author. The court
 has held that the author's
 right of publicity is a property
 right that can be inherited.
 The court found that the
 author's estate had a valid
 claim for damages. The court
 awarded the estate \$1.5 million
 in damages. The court also
 awarded the estate \$100,000
 in costs. The court affirmed
 the trial court's judgment.
 The court also awarded the
 estate \$100,000 in costs.
 The court affirmed the trial
 court's judgment. The court
 also awarded the estate \$100,000
 in costs. The court affirmed
 the trial court's judgment.

Rough
9/6/78 E

Maria Kolaris

My father spoke very strongly about my father's anger to have
well and was very much in the air. During these observations
I told him all about the church and the church's
affairs to explain to him what was going on. I felt that he
was not understanding the church and its purpose.

...member of
People Temple of the Disciples of Christ (the church, People Temple).
Since January of 1972, I first attended in May of 1972,
with my father, and continued to attend through the fall. I finally
became a member in first meeting on Saturday, October 15, 1972,
at Redwood Valley.
When he was introduced to me as the church attorney,
I started to go to church in 1972. I began to my father began
to be uncomfortable with my participation. He is a former
bank robber. Once and it was very different from his religion
thing. I said he respected the same and purposes of the church.
At the time, I was becoming increasingly active and he became increasingly negative, particularly when
(at these 20 years)
I chose to live in the family home and reside with church friends.
Before I left my father's home, I consulted with Tim Stone
about my rights because of my father's hostility and negativity.
Periodically thereafter I consulted with Tim Stone about
my relationship with my father, and his attitude toward
me and the church. I believe it was in the fall of 1974
when he and I had a discussion about the possibility
of my father attempting to obtain a conservatorship over me. Carl
Stahl was present. He gave me very elaborate advice as to what
to do. First, he thought I should go to lawyer to avoid
court jurisdiction. If not, he told me to stay in the San
Francisco Church. When I was the only one always go out with
several other persons, and to keep his name hidden and call him.
He told me to develop the relationship with my father if needed to avoid
any further problems. I then had a lengthy discussion
with my father, then was a lengthy discussion.

FF-2-B-6A

at the S.F. Office

FF-2-6B

Affidavit of Johnny Moss Jones

I have been a ~~member~~ ^{member} of the U.S. A.T. since 1970. I was employed as a public program administrator. I have been a member of Peoples Temple of the Disciples of Christ since 1970 and became an

Associate Minister in 1972. I have held ever since. I have known Timothy D. Stoen (Tim Stoen) since 1972.

He advised me, suggested to give me guardianship proceeding, travel matters, various legal problems of members, and on church organizational matters. In 1972 Tim Stoen was an attorney and

myself negotiated the ^{summer} trip in 1973. Peoples Temple had a large joint meeting in Los Angeles Convention Center, jointly with the Nation of Islam. Approximately 20,000 persons attended

from across the country. Timothy D. Stoen was the speaker who introduced Reverend Jones. He ^{also} identified himself as

Assistant District Attorney for Mendocino County, Chairman of the Board of ^{Peoples Temple} ~~Peoples Temple~~, and attorney for Peoples Temple, and spoke as such.

He also was active as a representative for Peoples Temple on the regional board.

I most recently first went to Guyana in December of 1977 with a Peoples Temple group, including myself. He was there for two weeks. He was the ^{only} legal adviser for the group in

analyzing Guyana laws and regulations, some organizational forms, trade and ownership regulations, and all other laws

pertinent to setting up a mission project. He did all of the original legal work for the Guyana ^{Mission} Project.

Tim Stoen left went again to Guyana in Feb of 1978, and stayed there until May or June of that year, except for a brief ^{trip to} ~~trip to~~ Europe and a trip with a Peoples

FF-2-10037A

[illegible]

Affidavit of Carolyn Layton Prokes:

I am by occupation a certificated secondary school teacher. I have been an active member of Peoples Temple since 1968. Over the years I have had many secretarial and administrative positions in the Church including a seat on the church Board of Directors. I have known Tim Stoen ^{Tim Stoen} from 1969 when he joined the church until 1977 when he left.

^{During the period from 1970 to 1977}
Part of my responsibilities were in the area of banking and investment of church funds. ^{During all that time} I frequently asked for and received advice from Tim ^{Stoen} concerning banking practices and the investment of church funds, as well as the legal effect of certain banking instruments, and the legal and tax consequences of various investments.

Often, usually bi-monthly, the Redwood Valley Congregation and the San Francisco Congregation would travel to Los Angeles for services there on the weekend, in a fleet of Greyhound-type busses owned and operated by the church. Tim, as I, would generally travel on the same buss - No. 7 - and I saw him do so dozens of times. He went for the purpose of giving legal counsel to members of the L.A. congregation, ~~and also to give legal advice to business meetings which were often held on Saturday nights.~~ which he would do during and after services. We routinely would have organizational meetings Saturday nights which Tim would regularly attend and give legal advice and opinions on various church projects, and activities.

Several times he represented the church in situations where we believed that ex-members had taken funds or other property from the church. ^(SEE ADDITION) This representation included hiring and paying private investigators. He also represented the church in several instances when we believed that we had been ^{libeled?} libeled by the press, including sending letters, telegrams and speaking with various persons. When outside counsel was employed in these matters they were selected by Stoen and supervised by him. On occasion the church adopted the tactic of filing a suit on behalf of some members rather than the corporation itself as in the case where Tim and Mike Prokes sued the columnist Lester Kinsolving. This was done on the basis of legal advice by ^{Stoen} ~~Stoen~~. The church paid the bill.

FF-2-~~11111~~ 8A
P. 92

Affidavit of Carolyn Layton Prokes: (page 2 of 2)

Although Tim never received a salary or fees for his work for the church, ~~they~~^{as} they were donated, there was some financial compensation. He received monies for travel expenses for church activities, and remuneration for gasoline and auto repairs. These various payments often amounted to \$400 to \$500 per month. He also received free room and board with a church member, arranged by the church, during the whole of 1976. Tim did make some financial contributions to the church while he was a member, but these were rather modest because he was ~~always~~ deeply in debt for school and other expenses, that he had acquired before joining the church.

o.k. EC 9/15
~~OK~~ HT

add: meeting = TOS + Mente
meeting = TOS, HT + Joyce Shaw -
late 1976

FF-2-~~4472~~ 8B

20/2

Addition to Carolyn's affidavit

On one occasion he arranged that I go with him to Berkeley, California for a meeting with Elmer and Deanna Mertle (aka Al and Jeannie Mills) who had left the church. ~~xxxx~~ We met the Mertles on Durant, near Shattuck Ave. in Berkeley, by the Berkeley public library. We walked to Shattuck ave where there were some concrete-type benches and sat down. Tim proceeded to write the Mertles notes, rather than communicate orally with them, as he said they might be taping us. I do not remember the content of those notes. This was in 1977.

^{late 1976 or early fall of}
Another time, in late 1976, Tim Stoen, Harriet Tropp, and Myself met another ex-member of the church at the apartment of Phyllis Houston at 998 Divisadero Street in S.F. The woman we met there was Joyce Gable Shaw. She had been living in the midwest, but returned for the funeral of her husband, Robert Houston, Jr. Tim again advised that nothing be said to her, except in writing. At the time, both Harriet and myself thought that this was a little ridiculous, since there was nothing improper about the content of the communication. Tim insisted however, and he produced a notebook with a message ~~xxx~~ typed on one of the sheets inside, covered with plastic, for Joyce Shaw to read. As I best recall the message said something about our esteem for her late husband, and our hope that she would not try to pressure ~~Robert~~ Mr. and Mrs. Robert Houston Sr. to take their grandchildren, Patricia and Judy Houston, out of the church. The children's mother was a member of the church and still is. I think we were concerned that Joyce might attempt to persuade the grandparents to obtain custody over the children. Again, this was during the period of "Moonie" conservatorship cases, and we were concerned about that issue.

FF-244403-86

OK
H

Affidavit⁴ of Eugene Chaikin:

As I recall now, the first time I attended Peoples Temple of the Disciples of Christ ("Peoples Temple", the "the church") was in January of 1972 at a meeting in Redwood Valley, California which is in Mendocino County about 20 miles north of Ukiah. At that time, having been an attorney licensed in the State of California for over 10 years, I was employed by Shasta County as Deputy County Counsel. Some of the first persons I met upon going to church were Timothy O. Stoen ("Tim Stoen" or "Tim") and his then wife Grace. Timothy introduced himself as Chairman of the Board and Attorney for the church, as well as ~~xxxx~~ Assistant District Attorney for Mendocino county~~in~~ in charge of civil matters - a position roughly equivalent to the one that I held in Shasta County at the time. I was very impressed with Tim and his dedication to the church and to Reverend Jones. We had a lot in common in terms of our jobs. He was very instrumental in impressing me with the ideals and value of the church. I continued to live and work in Shasta County, but attend church frequently in Mendocino County. The person that I dealt with more than anyone else was Tim Stoen. He functioned as chief legal counsel for the church and I acted as his assistant, principally doing free legal work for indigent persons in the church free legal services program.

During the summer of 1972 I gave up my job in ~~xxxxxx~~ Shasta County and my family and I moved to Redwood Valley where I began to work on church affairs, non compensated mostly free legal services on/a full time basis. The church was growing very rapidly, there were lots of new members and it seemed that they all had legal problems. Tim continued to do the bulk of the church legal work, and to supervise me in the legal services program. ^{appear to be} He was one of the hardest working lawyers I have ever met. This relationship continued until December 31, 1973 when I went to Guyana to set up the church mission program there. One exception to the statement that I was not very involved in church organization legal work was in the area of real estate where I worked with Tim because I had a heavy real estate background.

114-4)

FF-2-~~xxxx~~ 9A

Affidavit of Eugene Chaikin: (2 of 4)

I remained in Guyana, South America until ^{July 31, 1975} ~~as I recall, the end of August,~~ 1975, when I returned to work with the church in the U.S.A. During the time I was in Guyana Tim worked as the sole legal counsel for Peoples Temple, taking care of all matters. On my return to the States I again began to ~~serve~~ ^{work with Tim} as counsel for the church and worked in that position ^{under} with Tim until the late spring or early summer of 1977 when he severed his connection with the church.

During the time that I worked with Tim ^{from} beginning in 1972, we handled many real estate transactions for the church, including the purchase of church properties in Mendocino County, San Francisco County and Los Angeles County. He organized and set up bank accounts for the church and was personally responsible for handling church funds and, in addition, funds of some individual members of the church in an individual capacity. He wrote several revisions of the Articles of Incorporation and of the Bylaws (which I also worked on) which encompassed a reorganization of the entire church structure. He continuously acted as the counsel for the church and representative of the church with the denomination, the Christian Church (Disciples of Christ). In this regard he contacted attorneys for the Disciples of Christ, attended meetings and conferences, wrote numerous letters and in other ways represented the church as attorney. There were several lawsuits filed against the church over the years. In each case Tim either represented the church, or selected outside counsel and supervised him for the church. I recall one rather lengthy suit involving a dispute over real property the church had purchased in Mendocino County which Tim handled alone for the church. ^{added P}

As a part of the church activities there was a so-called governmental, or organizational meeting of some principal members of the church at least once every two weeks and usually more frequently. The Board usually ratified decisions made informally in these meetings. These meetings continued, from my knowledge, from the summer of 1973 through the summer of 1977. Tim attended the meetings regularly till he went to Guyana in February of 1977, and in almost every meeting gave legal advice concerning matters that were broached that had legal implications.

(2 of 4)

FF-2-11/11/79B

15 - Mike Cassat Shove:
 20 - Arrived Heathrow 30 Mar 1977
 21 - Left Heathrow 1 April 1977
 22 - Arrived Heathrow 2 April 1977
 23 - Left Heathrow 3 April 1977
 24 - Arrived Heathrow 4 April 1977
 25 - Left Heathrow 5 April 1977
 26 - Arrived Heathrow 6 April 1977
 27 - Left Heathrow 7 April 1977
 28 - Arrived Heathrow 8 April 1977
 29 - Left Heathrow 9 April 1977
 30 - Arrived Heathrow 10 April 1977
 31 - Left Heathrow 11 April 1977
 32 - Arrived Heathrow 12 April 1977
 33 - Left Heathrow 13 April 1977
 34 - Arrived Heathrow 14 April 1977
 35 - Left Heathrow 15 April 1977
 36 - Arrived Heathrow 16 April 1977
 37 - Left Heathrow 17 April 1977
 38 - Arrived Heathrow 18 April 1977
 39 - Left Heathrow 19 April 1977
 40 - Arrived Heathrow 20 April 1977
 41 - Left Heathrow 21 April 1977
 42 - Arrived Heathrow 22 April 1977
 43 - Left Heathrow 23 April 1977
 44 - Arrived Heathrow 24 April 1977
 45 - Left Heathrow 25 April 1977
 46 - Arrived Heathrow 26 April 1977
 47 - Left Heathrow 27 April 1977
 48 - Arrived Heathrow 28 April 1977
 49 - Left Heathrow 29 April 1977
 50 - Arrived Heathrow 30 April 1977
 51 - Left Heathrow 1 May 1977
 52 - Arrived Heathrow 2 May 1977
 53 - Left Heathrow 3 May 1977
 54 - Arrived Heathrow 4 May 1977
 55 - Left Heathrow 5 May 1977
 56 - Arrived Heathrow 6 May 1977
 57 - Left Heathrow 7 May 1977
 58 - Arrived Heathrow 8 May 1977
 59 - Left Heathrow 9 May 1977
 60 - Arrived Heathrow 10 May 1977
 61 - Left Heathrow 11 May 1977
 62 - Arrived Heathrow 12 May 1977
 63 - Left Heathrow 13 May 1977
 64 - Arrived Heathrow 14 May 1977
 65 - Left Heathrow 15 May 1977
 66 - Arrived Heathrow 16 May 1977
 67 - Left Heathrow 17 May 1977
 68 - Arrived Heathrow 18 May 1977
 69 - Left Heathrow 19 May 1977
 70 - Arrived Heathrow 20 May 1977
 71 - Left Heathrow 21 May 1977
 72 - Arrived Heathrow 22 May 1977
 73 - Left Heathrow 23 May 1977
 74 - Arrived Heathrow 24 May 1977
 75 - Left Heathrow 25 May 1977
 76 - Arrived Heathrow 26 May 1977
 77 - Left Heathrow 27 May 1977
 78 - Arrived Heathrow 28 May 1977
 79 - Left Heathrow 29 May 1977
 80 - Arrived Heathrow 30 May 1977
 81 - Left Heathrow 31 May 1977
 82 - Arrived Heathrow 1 June 1977
 83 - Left Heathrow 2 June 1977
 84 - Arrived Heathrow 3 June 1977
 85 - Left Heathrow 4 June 1977
 86 - Arrived Heathrow 5 June 1977
 87 - Left Heathrow 6 June 1977
 88 - Arrived Heathrow 7 June 1977
 89 - Left Heathrow 8 June 1977
 90 - Arrived Heathrow 9 June 1977
 91 - Left Heathrow 10 June 1977
 92 - Arrived Heathrow 11 June 1977
 93 - Left Heathrow 12 June 1977
 94 - Arrived Heathrow 13 June 1977
 95 - Left Heathrow 14 June 1977
 96 - Arrived Heathrow 15 June 1977
 97 - Left Heathrow 16 June 1977
 98 - Arrived Heathrow 17 June 1977
 99 - Left Heathrow 18 June 1977
 100 - Arrived Heathrow 19 June 1977
 101 - Left Heathrow 20 June 1977
 102 - Arrived Heathrow 21 June 1977
 103 - Left Heathrow 22 June 1977
 104 - Arrived Heathrow 23 June 1977
 105 - Left Heathrow 24 June 1977
 106 - Arrived Heathrow 25 June 1977
 107 - Left Heathrow 26 June 1977
 108 - Arrived Heathrow 27 June 1977
 109 - Left Heathrow 28 June 1977
 110 - Arrived Heathrow 29 June 1977
 111 - Left Heathrow 30 June 1977
 112 - Arrived Heathrow 1 July 1977
 113 - Left Heathrow 2 July 1977
 114 - Arrived Heathrow 3 July 1977
 115 - Left Heathrow 4 July 1977
 116 - Arrived Heathrow 5 July 1977
 117 - Left Heathrow 6 July 1977
 118 - Arrived Heathrow 7 July 1977
 119 - Left Heathrow 8 July 1977
 120 - Arrived Heathrow 9 July 1977
 121 - Left Heathrow 10 July 1977
 122 - Arrived Heathrow 11 July 1977
 123 - Left Heathrow 12 July 1977
 124 - Arrived Heathrow 13 July 1977
 125 - Left Heathrow 14 July 1977
 126 - Arrived Heathrow 15 July 1977
 127 - Left Heathrow 16 July 1977
 128 - Arrived Heathrow 17 July 1977
 129 - Left Heathrow 18 July 1977
 130 - Arrived Heathrow 19 July 1977
 131 - Left Heathrow 20 July 1977
 132 - Arrived Heathrow 21 July 1977
 133 - Left Heathrow 22 July 1977
 134 - Arrived Heathrow 23 July 1977
 135 - Left Heathrow 24 July 1977
 136 - Arrived Heathrow 25 July 1977
 137 - Left Heathrow 26 July 1977
 138 - Arrived Heathrow 27 July 1977
 139 - Left Heathrow 28 July 1977
 140 - Arrived Heathrow 29 July 1977
 141 - Left <

① Arrived Westboro 30 Mar 1977

② Left Kathiawar 1. 11. 1941

2025 RELEASE UNDER E.O. 14176

to the fact that the company's operations have been "in a constant state of flux" and "consequently" of

THE HONORABLE CHIEF JUSTICE OF THE SUPREME COURT OF THE UNITED STATES

1944-1945

1968-1969

SECRET

192012 0160 581001 006 CUMLEN CAEL 006 12 42 000 5801 0000 0000 0000 100

TOP SECRET SMO TO COMBATANT. DECLASSIFIED BY THE COMBATANT SE-SP-00000000. DATE 2000 08/06/01.

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 06-18-2009 BY 60322 UCBAW

.....

The following are the names of the persons who have been identified as having been involved in the activities described above:

co. must be provided and the results of the study with the recommendation

...of the simple capacity arguments... the construction of the...

OF THE UNITED STATES DEPARTMENT OF JUSTICE

12-00000

ADD CHARGE TO GS 105-1A-1987-00250-112

of persons who have been in contact with the person who was the source of the infection.

[Faint mirrored bleed-through from reverse side]

1960-61-62 11-12-62 13-14-62 15-16-62 17-18-62 19-20-62 21-22-62 23-24-62 25-26-62 27-28-62 29-30-62 31-32-62 33-34-62 35-36-62 37-38-62 39-40-62 41-42-62 43-44-62 45-46-62 47-48-62 49-50-62 51-52-62 53-54-62 55-56-62 57-58-62 59-60-62 61-62-62 63-64-62 65-66-62 67-68-62 69-70-62 71-72-62 73-74-62 75-76-62 77-78-62 79-80-62 81-82-62 83-84-62 85-86-62 87-88-62 89-90-62 91-92-62 93-94-62 95-96-62 97-98-62 99-100-62 101-102-62 103-104-62 105-106-62 107-108-62 109-110-62 111-112-62 113-114-62 115-116-62 117-118-62 119-120-62 121-122-62 123-124-62 125-126-62 127-128-62 129-130-62 131-132-62 133-134-62 135-136-62 137-138-62 139-140-62 141-142-62 143-144-62 145-146-62 147-148-62 149-150-62 151-152-62 153-154-62 155-156-62 157-158-62 159-160-62 161-162-62 163-164-62 165-166-62 167-168-62 169-170-62 171-172-62 173-174-62 175-176-62 177-178-62 179-180-62 181-182-62 183-184-62 185-186-62 187-188-62 189-190-62 191-192-62 193-194-62 195-196-62 197-198-62 199-200-62 201-202-62 203-204-62 205-206-62 207-208-62 209-210-62 211-212-62 213-214-62 215-216-62 217-218-62 219-220-62 221-222-62 223-224-62 225-226-62 227-228-62 229-230-62 231-232-62 233-234-62 235-236-62 237-238-62 239-240-62 241-242-62 243-244-62 245-246-62 247-248-62 249-250-62 251-252-62 253-254-62 255-256-62 257-258-62 259-260-62 261-262-62 263-264-62 265-266-62 267-268-62 269-270-62 271-272-62 273-274-62 275-276-62 277-278-62 279-280-62 281-282-62 283-284-62 285-286-62 287-288-62 289-290-62 291-292-62 293-294-62 295-296-62 297-298-62 299-300-62 301-302-62 303-304-62 305-306-62 307-308-62 309-310-62 311-312-62 313-314-62 315-316-62 317-318-62 319-320-62 321-322-62 323-324-62 325-326-62 327-328-62 329-330-62 331-332-62 333-334-62 335-336-62 337-338-62 339-340-62 341-342-62 343-344-62 345-346-62 347-348-62 349-350-62 351-352-62 353-354-62 355-356-62 357-358-62 359-360-62 361-362-62 363-364-62 365-366-62 367-368-62 369-370-62 371-372-62 373-374-62 375-376-62 377-378-62 379-380-62 381-382-62 383-384-62 385-386-62 387-388-62 389-390-62 391-392-62 393-394-62 395-396-62 397-398-62 399-400-62 401-402-62 403-404-62 405-406-62 407-408-62 409-410-62 411-412-62 413-414-62 415-416-62 417-418-62 419-420-62 421-422-62 423-424-62 425-426-62 427-428-62 429-430-62 431-432-62 433-434-62 435-436-62 437-438-62 439-440-62 441-442-62 443-444-62 445-446-62 447-448-62 449-450-62 451-452-62 453-454-62 455-456-62 457-458-62 459-460-62 461-462-62 463-464-62 465-466-62 467-468-62 469-470-62 471-472-62 473-474-62 475-476-62 477-478-62 479-480-62 481-482-62 483-484-62 485-486-62 487-488-62 489-490-62 491-492-62 493-494-62 495-496-62 497-498-62 499-500-62 501-502-62 503-504-62 505-506-62 507-508-62 509-510-62 511-512-62 513-514-62 515-516-62 517-518-62 519-520-62 521-522-62 523-524-62 525-526-62 527-528-62 529-530-62 531-532-62 533-534-62 535-536-62 537-538-62 539-540-62 541-542-62 543-544-62 545-546-62 547-548-62 549-550-62 551-552-62 553-554-62 555-556-62 557-558-62 559-560-62 561-562-62 563-564-62 565-566-62 567-568-62 569-570-62 571-572-62 573-574-62 575-576-62 577-578-62 579-580-62 581-582-62 583-584-62 585-586-62 587-588-62 589-590-62 591-592-62 593-594-62 595-596-62 597-598-62 599-600-62 601-602-62 603-604-62 605-606-62 607-608-62 609-610-62 611-612-62 613-614-62 615-616-62 617-618-62 619-620-62 621-622-62 623-624-62 625-626-62 627-628-62 629-630-62 631-632-62 633-634-62 635-636-62 637-638-62 639-640-62 641-642-62 643-644-62 645-646-62 647-648-62 649-650-62 651-652-62 653-654-62 655-656-62 657-658-62 659-660-62 661-662-62 663-664-62 665-666-62 667-668-62 669-670-62 671-672-62 673-674-62 675-676-62 677-678-62 679-680-62 681-682-62 683-684-62 685-686-62 687-688-62 689-690-62 691-692-62 693-694-62 695-696-62 697-698-62 699-700-62 701-702-62 703-704-62 705-706-62 707-708-62 709-710-62 711-712-62 713-714-62 715-716-62 717-718-62 719-720-62 721-722-62 723-724-62 725-726-62 727-728-62 729-730-62 731-732-62 733-734-62 735-736-62 737-738-62 739-740-62 741-742-62 743-744-62 745-746-62 747-748-62 749-750-62 751-752-62 753-754-62 755-756-62 757-758-62 759-760-62 761-762-62 763-764-62 765-766-62 767-768-62 769

1. The above information was obtained from the files of the [redacted] and is being furnished to you for your information.

SECRET

THE DEPT. OF THE ARMY, WASHINGTON, D. C. 20315

SECRET - ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED EXCEPT WHERE SHOWN OTHERWISE

[illegible]

IN THE MATTER OF THE ESTATE OF JAMES EARL RAY, JR., DECEASED

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 03-01-2001 BY 60322 UCBAW

[illegible]

There were 100,000 people in the city in the 1920's. The city was

1. LAMBERTS IN QUARTER, COPY REPRODUCED FROM THE ST. LOUIS, MO. 1912

DECLASSIFICATION AUTHORITY: (S.D.)

100

Affidavit of Eugene Chaikin: (3 of 4)

As a result of these activities he became intimately familiar with all of the affairs, corporate, financial, religious and otherwise of the church structure. It is difficult to imagine any other person in the entire organization of this large church, which by the end of 1973 had some 20,000 members, maintained three independent church structures with three independent congregations, maintained a fleet of 11 Greyhound-type busses which it serviced itself and regularly moved that caravan all over California and annually across the United States, who was more intimately familiar with all of the affairs of the church than Timothy O. Stoen. He ^{seemed} was one of the most dedicated persons I have ever met - his life was his job and the church. He hardly took out time to eat and sleep. I suppose that his position can be best expressed by the office that he held for a number of years - Chairman of the Board of Directors, and *Chief Legal Counsel.*

.....
Added Paragraph

He gave legal advice to the Board of Directors, the Officers and the Pastoral staff of the Church. He wrote numerous letters to various persons with respect to the legal activities of the church. He filed tax returns with the State of California and exemption certificates with several counties. He gave legal advice concerning acceptance of donations for members. Among others was a donation of two pieces of real property in Los Angeles County by Wade and Mable Medlock. He drew a huge variety of legal forms used by various church departments and programs, including the Guyana project. He wrote wills with dispositive provisions in favor of the church, drew gift deeds and other documents. He gave legal advice to literally thousands of church members. As a result of participating in the church legal services program he became intimately familiar with the lives of hundreds of church members.

Tim was especially close to persons who had more intimate organizational connections with the church. An example is Maria Katsaris, whose case he discussed in detail in my presence a number of times - both in the U.S. and later,

(3 of 4)

FF-2-4448 9C

connections with the church. An example is Maria Katsaris, whose case he dis-
cussed in detail in my presence a number of times - both in the U.S. and later,
the lives of hundreds of church members.
His trip to the church legal services program he became intimately familiar with
gave legal advice to literally thousands of church members. As a result of this
exposure in favor of the church, drew gift deeds and other documents.

connections with the church. An example is Maria Katsaris, whose case he dis-

in detail in my presence a number of times - both in the U.S. and later,

FF-2-i-4

67-5-77-1 (3)

Affidavit of Eugene Chaikin: (4 of 4)

in Guyana, ^{in April, 1977.} During the latter part of 1975, 1976, and early into 1977 there was a law office established on the premises of the San Francisco Church. There were a number of persons who worked together there handling church business and also handling clients affairs as part of the legal services program. Among others were myself, June Crym, Harriet Tropp (who was then a law student), Bea Orsot and several others. Weekly meetings were held similar to meetings in any law firm where files were reviewed and significant business discussed. Tim ^{provided over} ~~attended~~ ^{as chief counsel} practically all of those meetings, participated in the discussions, drafted documents, dealt with transactions and worked with the cases, as did the others.

FF-2- ~~WHA~~ 9D

ADDITION TO CHAIKIN AFFIDAVIT:

The Guyana meeting occurred as follows. On or about April 23, 1977 at the San Francisco church we received a message from Tim Stoen requesting that Harriet Tropp and I come to Guyana for a legal conference. We were to drop everything and come at once. We did so and arrived in Georgetown, Guyana, as reflected by the date stamp on my passport, on April 27, 1977. We went at once to the house kept by the Peoples Temple Guyana organization ^{at 41} ^{Georgetown} ~~in~~ Lamaha Gardens, and began a conference that continued till May 1, 1977 when, again according to the date stamp on my passport, we returned to the U.S.A. The conference lasted over 60 hours, allowing only time for some sleep. It took place in the large master bedroom in the rear of the dwelling. Present were Carolyn Layton Prokes, Terri Buford, Timothy O. Stoen, Jim Jones, Harriet Tropp and myself. Marceline Jones, wife of Jim Jones for ___ years, was there from time to time.

Several subjects were discussed in detail. Among those was the risk that conservatorships might be attempted against some of the members and strategies to avoid them. Individual cases were discussed. In particular we discussed Maria Katsaris case. I can recall Tim Stoen saying that her father Steve Katsaris was an evil man, very dangerous to the church; that he was very hostile and would stoop to any level; that he was a "no good bastard" or words to that effect. He told us that Maria had told him in detail about how her father had ~~xxx~~ molested her, that he personally had reviewed the facts and believed that Maria was telling the truth. He advised that he suggest to her that she come to Guyana to avoid the jurisdiction of the court; that if that were not immediately possible she should stay inside the San Francisco church and not go out; and that she should stay away from her father altogether but should write "nice" letters to him to mollify him. He also suggested that she disclose the facts that he had molested her feeling that such disclosure would deter her father from further pursuit of her.

//

FF-2-444 9E

Affidavit of Laura Johnston: (1 of 2)

I am a social worker by profession. I first joined Peoples Temple/in February of 1970, just a few months after Tim ^{Stoen} ~~Stoen~~. I knew Tim till he left Georgetown, Guyana in ~~May~~ June of 1977. I stayed at his home in Redwood Valley from February to June in 1970. During that time I constantly heard him involved in church legal business.

I was employed by the Mendocino County Welfare Department as a social worker in August of 1970 and worked there till March of 1977. During most of that time Tim was employed as Assistant District Attorney of the Mendocino County District Attorney. He was the attorney that advised the Welfare Department. During those years I would ask his advice on how to assist ^{Peoples} Temple Members in resolving problems or potential problems that they had with welfare.

During my career in Mendocino County the church owned several care homes in Mendocino County which were county licensed. Several other county licensed homes were owned and operated by church members. The licensing agency was the Welfare Department. One of my, and Tim's duties for the church was to advise and counsel on welfare matters including care home licensing matters. During the time we worked together in Mendocino County, at least once weekly or more often, Tim ^{for} advised church officials and care home operators concerning legal aspects

of the operation of care homes. ~~xxx~~ Of course, all such advice was and help was without charge. These services were extended as a part of the "people helping people" philosophy.

I would regularly for years counsel people at church on their welfare problems and Tim would regularly counsel with me giving legal advice on the same subject. He also advised me on many occasions to select numbers of church volunteers to come to various court proceedings in sympathy with the causes of church members. On such occasions he would tell me the background of such cases, how to act and what to say.

FF-2-10A

Affidavit of Laura Johnston: (2 of 2)

When Tim Stoen was in Guyana in the Spring of 1977, I was also there and I recall that he gave legal advice to many members there and also to church officials about the conduct of their affairs both in Guyana and the United States. He also did the legal work on buying a house in Georgetown and investing church funds in Guyana including the purchase of Government Bonds. ~~XXXXXX~~

ok E.C. 8/4
C

FF-2- 10B

Affidavit of Harold Cordell: I am at present 41 years of age. I have been an active member of Peoples Temple since 1955. I work as a bookkeeper and in cost accounting. I have worked on the books and records of Peoples Temple since 1971 as a part time volunteer worker, and on a full time basis since about March of 1975.

I have known Tim Stoen since 1969 or early 1970 when he joined the Church. Shortly after he became a member he became active in the central organizational structure because of his legal background and qualifications. He was the only attorney of the church for all tax and corporate functions, and all business functions till summer of 1972 when Gene Chaikin began to assist him, and again during the whole of 1974 and the first eight months of 1975 when Gene Chaikin was in Guyana. Until the latter part of 1975, during those times when Gene Chaikin was active in church affairs in the United States, Tim Stoen acted as senior counsel. As such he was acquainted with and participated in all aspects of Peoples Temple activities and programs.

I can recall being advised by Tim, and working with him on tax matters including Church tax returns during the years 1973, 1974 and 1975; with respect to corporate and financial affairs during 1973, 1974, 1975, and 1976; with respect to church which he regularly reviewed and approved during 1973, 1974, 1975, and 1976; with respect to tax returns for members which we did on a volunteer basis during the same years; with respect to the management of church owned real properties during 1973, 1974, and 1975. During these years he either handled himself or supervised outside counsel in handling all church litigation (there were several cases) and all claims made against the church.

During the years 1973, 1974, 1975 and 1976, to my knowledge as an attorney he spent at least 20 hours per week working on church legal affairs. Next to Rev. Jones he was the single person most acquainted with the total program of the Peoples Temple Church because he would give "legal clearance" on every proposed program and periodic "legal review" of every active church program.

Affidavit of Harold Cordell (page 2)

During the years of 1970 through 1976 he was usually available before, during, Wednesday and after church services (Sundays, Saturday nights, and ~~Friday~~ nights) to give free legal counsel and assistance to all persons who attended church and might desire such. In this function he became intimately acquainted with the confidential affairs of almost all of the active membership of the Church, and also hundreds of more casual members.

All references in this affidavit to Tim or Tim Stoen refer to the defendant Timothy O. Stoen. All references to "church", "the church", "peoples temple" refer to the plaintiff Peoples Temple of the Disciples of Christ, a California Corporation.

ok E.S. 9/4

FF-2-111B

Affidavit of Johnny Moss Jones:

While in the U.S.A. I was employed as a public programs administrator. I have been a member of the Peoples Temple of the Disciples of Christ ("the church", "Pepples Temple") since 1970, and became and remained an Associate Minister since 1972. I have known Timothy O. Stoen ("Tim Stoen") since 1970.

He advised me on, among other things, a Guardianship proceeding, traffic matters, various legal problems of members, and on church organizational matters. In the ~~xxxxx~~ ^{May} of 1976 Peoples Temple held a mass meeting in the Los Angeles Convention center jointly with the Nation of Islam. Approximately 20,000 persons

attended from across the country. Tim Stoen was the speaker who introduced Rev. Jones. Tim was introduced as ~~Assistant~~ ^{Deputy} District Attorney for ~~Kendall~~ ^{San Francisco} County, Attorney for and Chairman of the Board of Peoples Temple.) Joseph Freitas

the District Attorney of San Francisco County was present on stage and also introduced. Next to Rev. Jones himself, for years Tim Stoen was the most prominent member of the church. He very frequently appeared in public as a spokesperson for the church and his weight as an attorney and as a District Attorney lent strength to his appearances.

Tim Stoen first went to Guyana in the ~~xxxxxx~~ winter of 1973 with a Peoples Temple group, including myself. He was there for two weeks. He was the only legal adviser for the group in analysing Guyana laws and regulations, forms of organization, trade and ownership regulations, and all of the other laws pertinent to setting up a mission.

Tim went to Guyana/^again in February of 1977 and stayed there till May or June of that year, except for a brief trip to Europe and a trip with a Peoples Temple group/^{along}to the island of Grenada in the Caribbean where the group studied including myself the possibility of establishing a second mission there and Tim provided legal advice, including participation in discussions with the Prime Minister. While in Guyana he studied to prepare for an examination for the Guyana Bar, and had made application for an Instructorship at the University of Guyana. He did considerable legal work including a review of the agricultural lease and corp-

(10/2)

FF-2-12A

Affidavit of ~~James~~ Johnny Moss Jones: (2 of 2)

oration, advised on the purchase of house (that was purchased) and on the purchase of several other investments and other items of real property (that were not purchased), negotiated the settlement of a dispute over the purchase of lumber, advised numerous church members about legal matters in the United States, and did sundry other legal work. During this period of time I was also in Guyana and often worked with Tim on these matters.

FF-2-~~100~~ 12B

Rev. F. H. 11/13
AFFIDAVIT OF JOHN HARRIS *entire*

Does he have a license?
By profession I am a forensic pathologist. I have been a member of Peoples Temple since October 1969. I have known Tim Stoen ^{1969-1970 (Tim Stoen)} from about that time until 1977.

He was introduced to me as the attorney who handled church affairs.

In Spring of 1970 I received legal advice from Tim Stoen regarding alimony and child support payments.

Sometime in 1971 I consulted Tim Stoen about a probation violation, and he again advised me as to what my legal rights were and what course of action I should pursue.

In 1972 Tim Stoen gave me legal advice regarding traffic violations. He dictated a letter for me to the judge and agreed to talk to him on my behalf.

In 1972 my probation was revoked and I went to jail. Tim Stoen gave me legal advice while I was in jail and arranged for bail. He also handled the payment of restitution, which resulted in my release from probation.

In 1973 Peoples Temple was interested in buying a printing firm in San Francisco called Infocom. I was working there at that time. Tim Stoen was negotiating on behalf of Peoples Temple for the purchase of the business. I participated with him in meetings to discuss the purchase with the current owners. While I worked at that firm, I printed church literature. Tim Stoen reviewed all the material prior to printing for ~~the legal~~ the legal implications of the content, and made corrections.

During 1973 Peoples Temple had a radio broadcast on KFAI. The station was planning on changing their format and cancelling our program. Tim Stoen, myself, and others spoke with the station manager. Tim Stoen was acting as the attorney for the church during that meeting.

In 1974 Tim Stoen gave me legal advice regarding a personal injury suit I was going to file against Penny's. ^{1/2c} Tim Stoen discussed with me the merits of the case and referred me to another attorney. He later reviewed the settlement offer and advised me that it would be in my best legal interest to accept it, which I ~~did~~ did.

In late 1974 I was involved in a car accident, and Tim Stoen gave me legal advice on this matter. Around 1975 I received legal advice from Tim Stoen on obtaining a passport. I was concerned because of my past police record. He also gave me legal advice on several occasions about welfare, social security and SSI.

In 1976 Tim Stoen gave me legal advice regarding child support and the payment of alimony, and referred me to another lawyer.

He never made a charge to me for any of these services, which he extended to all church members without cost as part of the church program.

FF-2-~~100~~ 13

21-10001 for?
EE 9/4
OK H. 9/4

Affidavit of Richard Tropp:

By profession I am a college instructor in English. I have been a member of the Church of Jesus Christ of Latter-day Saints since 1970, and have known Tim Stoen since that time. ^{to clear}

During 1976 and 1977 Peoples Temple published a periodical entitled "Peoples Forum". I had an editorial responsibility for the paper and wrote a considerable portion of the material. The printed material went through an organizational structure prior to being cleared for publication. Among these was a legal check because, of course, we wanted to avoid litigation which is always a risk in printing a periodical. Tim would be routinely given materials for legal clearance prior to publication and he would return the materials with such corrections as he might make and with his initials indicating his approval of the materials for publication.

In addition to the "Peoples Forum", since 1973 the church also sent out a monthly solicitation mailer, printed notices of meetings, and other printed materials. Tim routinely cleared these materials for legal problems prior to their distribution, in the same manner as described above for the newspaper materials.

Don't have human service motif

Handwritten: "Handwritten" "Complete" "Type"

Affidavit of Jack Lovell Beam: (1 of 2)

The original and production organization took place in the Temple, the church.

I have been a member of Peoples Temple/since 1949, one of the founding members. The Temple has always been an activist organization. All members are expected to devote a great deal of time and energy to Church projects and organization, and most do so. The members of Peoples Temple are far more involved in Church activities than are the members of most churches. *Handwritten: "I have known Tim Stoen since 1969 when he joined. At that time there was no member who was an attorney. The Church had no regular attorney. Tim was very devoted and immediately assumed that role. When he joined he was employed by the Mendocino County Legal Services Foundation and was very concerned over the legal needs of the poor. The church had similar concerns, and in fact had assisted him to set up his office, so his transition to church work was very easy."*

The church very rapidly grew in size. *Handwritten: "Stoen's"* Tim's work and influence in the church grew as the church grew. He assumed full charge of all of the legal affairs of the church and its members, including Jim Jones, the Pastor and guiding influence of Peoples Temple since its inception. *Handwritten: "All legal decisions were left to him."* From 1970 to 1973 our church grew from a small congregation in Redwood Valley, Mendocino County, California to a congregation of *Handwritten: "well"* over 16,000 owning churches in Redwood Valley, San Francisco and Los Angeles, with members in every major city *Handwritten: "in California"* between Ukiah on the north and San Diego on the South, *Handwritten: "with additional smaller congregations in Philadelphia, P.A., Chicago, Ill., and Houston, Tex."* and owning in addition four care homes and a number of residences in Mendocino County, a large auxiliary project center in Mendocino County, an 31 unit Apartment house in Los Angeles and a fleet of 11 Greyhound-buses type/which made annual and often *Handwritten: "twice"* semi-annual tours around the United States and weekly runs between Mendocino County on the North and Los Angeles County on the south. Periodical publications and regularly scheduled radio broadcasts were produced and solicitation mailers and other publications distributed. A full scale free legal services program was instituted which rendered legal services to more than 100 persons weekly.

FF-2-15A

Affidavit of Jack Lovell Beam: (2 of 2) Tim

Tim Stone did the legal work on ^{all} most of this entire development. Another attorney Eugene Chaikin joined in 1972 but his role from then till ~~the~~ the end of 1973 when he went to Guyana was as an assistant to Tim, ^{Stone} Tim Stone remained the principle attorney and legal adviser to Peoples Temple till ^{Summer} spring of 1977 when he resigned. During his entire membership he had the principle responsibility for all of the legal affairs of the church and was the personal attorney of literally thousands of church members. He was intimately familiar with the total structure of the church and ^{with} all of its projects ^{and operations}. He served many ^{for years as} offices, but principally as a Director, and Chairman of the Board of Directors of Peoples Temple.

ok. E.C. 7/1
OK RT

FF-2-~~und~~ 15B

P. The Church has always been devoted to human service.
They believe that service of the good & great is of the greatest importance.
That they must do it better, rather than just
talk about it. That's very involved. It's not practical the
before the people and doing it goes new means to the neighborhood
and as I became a reality. The reality was that one hundred thousand
people at one time, fed him, clothed them, and then
helped them learn more, organizing responsibility. A church
that cannot find itself a lot of loyalty in developed so
be able to organize the people into rules were organized,
on the street, personal solicits for which the
world give big sums. Then we went to find
a free legal center for poor people, the doctor
of funds that were the first medical fees for patients who could
not afford it, maintaining over a hundred organs
for vision and minority groups, an entire group of free
tuition and support for colleges for poor students
students. At one time in 1963 we had more than 110
students in University and Colleges within 3 - hours radius -
2 in medical school, a person entering a university team
reverted home for those who could not afford them - and who
often had been cited for violating regulations, not going to work
made for persons who could not afford to and were looking
their homes, we supported many other civic groups under
a Senior Protection Service, and a local free medical clinic.
Hospital ventilation and care to senior citizens program were
conducted on regularly, as were programs for widows -
persons in jails and prison. We gave vision and funds
to persons in the prison and organization in the American Indian
movement, for groups who have been in the depths
of poverty and oppression for decades. Many if not most
members were active in several of these programs. We tried
most diligently to demonstrate that one really could live his
brother keeper.

Handwritten: Affidavit of John B...

They believe that service to the Society can best be expressed by service to one's fellow man, that they must - as a religious-philosophical imperative demonstrate goodness rather than just talking about it, and that this demonstration must be an ongoing part of their everyday lives. In practice this becomes very involved. Jim Jones had proclaimed this before the people and doing it gave a new meaning to the people's lives, and so it became a reality. reality was They ~~realized~~ that one indeed takes people into one's home, feeds them, clothes them, pays their bills. It becomes one's ongoing responsibility, and with that concept of reality a lot of loyalty is developed.

^{institutions programs like}
To finance these ideas-becoming ~~programs~~ pastry sales and rummage sales were developed, funds solicited on the streets and in the offices of donors of larger means. These sums went to fund a free legal services program. They went to pay medical fees for those who could not afford adequate medicine. They went to support preventative medical programs for senior and minority groups. They supported a college scholarship program which, at its height supported over 110 students ~~in~~, either part or full time, in colleges and universities, including three students in law school and two in medical school. They supported a program whereby the homes of poor persons ^{loss through} who were facing the/demolition of their homes due to deterioration, had them repaired by a volunteer construction team with materials furnished by the church, all without cost to the recipient. It went to make up mortgage payments for those who were in danger of losing their homes due to financial ill fortune. It went to support other service agencies in the community, including, among others a medical clinic and a senior citizens protective service in San Francisco. Hospital visitations and senior care programs were carried on regularly, as were programs for the visitation of persons in jails and prisons. We gave material and financial support to the American Indian struggle, a group who have for decades been in the depths of poverty and oppression.

Most members were active in several of these programs. We tried to demonstrate most diligently that we really could be our brothers keeper.

Handwritten: 15C
FF-2-11113

Rough 9/3 - HT

AFFIDAVIT OF CHARLES TOUCHETTE

By profession I am a sales engineer and construction superintendent.
of the Disciples of Christ ("McKune's Peoples Temple")
I became a member of Peoples Temple ~~in~~ in December of 1970. I have known
^{Tim Stoen} Tim Stoen ^("Tim Stoen") since that time, until Spring of 1977. He introduced himself to
me as attorney for the church at a meeting soon after I joined the church.

In September 1973 an incident occurred when Jim Cobb, ~~and~~ my daughter
Mickey Touchette, and others left the church. When they left, they took
with them certain items that were not their property. Among those items,
as I recall, were a hunting rifle, the property of one Tom Kice, a member
of the church. In addition, they had vandalized Tom Kice's property by
tearing the phone out of the wall and doing other damage. Because I was
very concerned about what they might ~~do~~ do with the weapon, Tom Kice
and I went to Tim Stoen's office in Ukiah. Tim Stoen ~~advised~~ gave us
legal advice on how to handle the situation so as to protect Tom, and how to
make a formal complaint. On his legal advice and instructions I talked with one
of the Sheriff's deputies in Ukiah about the matter.

I moved to Guyana in July of 1974 with my family and I have been in Guyana
since that time. I last saw Tim Stoen in the Spring of 1977 in Jonestown
Guyana. Tim Stoen was in Guyana ~~in~~ Jonestown ^{for} approximately two months. Twice
weekly ~~there~~ there were organizational meetings that Tim Stoen participated
in and gave legal advice on purchases of businesses and real properties in
Guyana; the resolution of sales disputes, household obligations, and other matters.

OK E.C. 9/4
OK
FF-2-16

DS
Affidavit of James W. Jones:

I have been the Pastor of Peoples Temple of the Disciples of Christ, and its predecessor organizations, since 1949. I am, and for some years have been a Minister ordained by the Christian Churches (Disciples of Christ), of which denomination the Peoples Temple is an affiliated church. I have always been an activist, striving to make the Christian goals of equality and brotherhood a social reality through the demonstration of people caring for each other. I

thus developed a large interracial church with extensive human service programs.

Timothy O. Stoen
When (Tim Stoen) joined my church in 1969 I was thrilled. Besides the addition of another sincere, committed member I was overjoyed to have his help because in my rapidly growing church I needed a concerned, dedicated lawyer badly. I also needed an activist associate minister badly and Tim rapidly began to fill both roles. I trusted him fully and entrusted him with more responsibility than any other single member of the organization. I was very greatly surprised by his departure in 1977.

I have read the Affidavits of Jack Beam, Eugene Chaikin, Joyce Parks, Maria Katsaris, Kay Nelson, Tish LeRoy, Harold Cordell, Carolyn Layton Brokes, Carol Stahl, Terri Buford and Mike Prokes, & Harriet Todd. To the extent that I have personal knowledge of the things therein described they are true and correct. I did consult privately with Tim Stoen about the Medlock gift, and Maria Katsaris problems with her father. I did consult privately with Tim Stoen about problems with Jim Cobb. In fact I consulted with him privately in addition to publically about most of the problems of the church which had any kind of legal implication. I am sure that over the years he, through his legal knowledge and activities, gained more confidential information about Peoples Temple and its members than any other living person.

10/1 + insat

FF-2-17A

He was my chief legal adviser and I did nothing
either with respect to the church or its members
if not that first I was the pastor of the church
his 1931 (2nd) (1919-1922) and for some years
again to 1925-1926 he was my legal adviser
Every time we had a court with him
Katherine Jones Cobb and Mabel were present
with him and we were all with him when
when (Jim Stoen) joined the church in 1929 I was
ion of another sincere, committed member I was overjoyed to have him
besides the ad-

in my newly forming church I needed a concept, the fastest lawyer I had
needed an activist minister ready and I was ready to begin to fill both
roles. I treated him fully and entrusted him with more responsibility than any
other dignitary of the organization. I was very grateful to him for his con-

I have read the affidavits of Jack Beane, Eugene Chaikin, Joyce Parks, Leta
Katherine, Ray Nelson, John LaRoy, Harold Corbell, Carolyn Layton Brookes, Carol
Stahl, Terry Buford and Mike Brookes. To the extent that I have personal knowledge
of the things he said described they are true and correct. I did consult with
with Jim Stoen about the Medlock girl and her problems with her
father. I did consult with Jim Stoen about problems with Jim Cobb. In
fact I consulted with him privately in addition to publicly about most of the

problems of the church which had any kind of legal implication. I am sure that
over the years he, through his legal knowledge and activities, gained more confi-
dence and information about people and its members than any other person

77-5-117A
1/11/74

④ He was my cheif legal adviser and I did nothing either with respect to the church or ~~tax~~ with respect to my own personal legal affairs without first consulting him and getting his legal approval. From sometime in 1969 through the summer of 1972, and again from January of 1973 through the summer of 1975 he was my, and the churches only legal adviser. Everything that was done in connection with Maria Katsaris, James Cobb and Mabel and Wade Medlock , ~~until he left the church~~ was done with his informed advice and consent.

FF-2-~~17A~~17B

Affidavit of Carol Stahl:

By profession I am an elementary school teacher. I have been a member of
of the Disciples of Christ ("the church") since 1968. Tim Stoen joined the church in 1969 and I have
Peoples Temple since 1968. Tim Stoen joined the church in 1969 and I have
known him since that time until he left in 1977.

I have held a series of volunteer jobs in the church over the years, and several
corporate offices and directorships, and am currently the Corporate President.
Shortly after Tim Stoen joined he became the attorney for the Church and really
he was the main attorney down through the years. We did employ other counsel
from time to time, and in 1972 Gene Chaikin joined the Church and did assist him
and handle the "free legal services" matters for members from mid 1972 through the
end of 1973, and again from mid 1975 through 1976, but Tim Stoen was always the
one primarily responsible for Church business and corporate activities.

He was the principal person I would discuss church business with if it had
any sort of legal implication. Under his direction I kept a whole series of
legal documents relating to church and individual business and personal affairs.

I was present on one occasion on 1976 when Maria Katsaris discussed her
relationship with her father and her fears concerning him with Stoen, and heard
him give her legal advice about it. I was also present in a Los Angeles meeting
of some of the key members of Peoples Temple in June or July of 1975 where Tim
Stoen gave Rev. Jones advice concerning a proposed donation of real properties
by Wade and Mable Medlock to the Church. He advised on how to handle the trans-
action "legally", what should be said and not said and so forth. He, himself
participated in obtaining the Medlocks signature on certain deeds. He was also
present at another meeting at which I was also present with the Medlocks in the
winter of 1976 where the gifts were discussed again and again advised how the
transaction should be handled.

out with
other people.
if it looked
like her
father was
going to
sue her
she could
go to Guyana.
(get
out of
Washington)

May 77

[Handwritten signature]

a report on the ^{He said}
gram till he ^{Katsura}
I ^{was a}
where I had ^{mean}
where Terri Buford ^{mean}
a legal con- ^{mean}
n 16-20 ^{mean}
vatorship issue. ^{mean}
jurisdiction.
Maria should
ther on several

SA Kataria
Anandis
baptist
cruz
Shorth

add 2nd
addition on
CL's aff.

22
1/15/80
AFFIDAVIT OF JEFFREY JAMES GAREY

Rough HT
9/13
of the Disciples of Christ (Peoples Temple)

By profession I am a cook. I have been a member of Peoples Temple since August of 1969. I have known Tim ^{Tim O. (Tim Stoen)} Stoen since that time until Spring of 1977, at Jonestown, in the Northwest District of Guyana, South America.

In 1973 Tim Stoen gave me legal advice concerning a criminal ~~matter~~ matter.

In addition, in 1972 I was concerned with my father's feeling about my participation in the church (I was then 19 years old) and I discussed the matter with Tim Stoen. He telephoned my father who was then a resident of Mangilao, Guam, and satisfied him as to the church, and arranged his consent for a church member, Jack Beam, to be my guardian to establish my residence for college tuition purposes.

Until I came to Guyana in 1974 ^{where I have been ever since} I worked in the church publications department evenings and weekends. I would run errands for Tim Stoen and routinely took all publications to him for "legal clearance". He would normally review them in my presence, correct and delete in his own hand, and initial "T.O.S.", and return them to me to take back to the publications department. I would also routinely take legal documents to him, for his review; I could take several files of such documents to Tim Stoen each week which he would, at times, review in my presence.

Affidavit of Mike Prokes:

after Dismissal (see 2) of 6/1/71 "People Temple"
I first visited Peoples Temple in 1972. At that time I was employed by KXTV Sacramento as News Bureau Chief, ^{Stockton} Stockton, Ca. I had come to Peoples Temple to do a news story. One of the first persons I met there was Timothy O. Stoen ^(Tim Stoen "Tim") who introduced himself to me as "the Church attorney", "Jim's attorney", and Assistant District Attorney for Mendocino County.

I was so impressed with what I saw and heard about the humanitarian work of the church that I decided to join full time. I became a member of the church staff responsible for radio broadcasts and publications. I later also assumed the community relations function. From the time that I became a staff member till late in 1976 as an organizational procedure of the church all of my working materials were given a "legal review" by Tim Stoen. before publication or distribution.

In 1976 the church began to publish a periodical entitled the "Peoples Forum". Tim, as the church attorney reviewed all material for legal clearance prior to publication. I would also seek and obtain legal advice from him with respect to the church structure and organization which I would then give out to the public officials and the media. He would also, often, give me legal advice as to the legal effect of public statements I would make on behalf of the Church.

During the years 1973, 1974, 1975, and 1976 I was in very close contact with Tim Stoen and sought his advice, by his instruction, almost daily with respect to Church business. I would call him at his office, at his home and also see him regularly at Church. He also gave advice concerning the organization of church volunteers to attend court hearings in support of certain causes, usually those involving members.

I was frequently present when he gave Rev. Jones advice about all matters of Church legal affairs including publications, media releases, corporate and denominational structure, tax, faith healing, and other topics. As the Church Attorney *virtually all legal matters were left to and I received Stoen's advice on everything he (Stoen) did.*

he was responsible for all legal relations and dealings with the denomination with which Peoples Temple is affiliated, the ~~PEOPLES TEMPLE~~ Christian Church of the (Dis-
page 1 of 2 *FF-2-1006 21A*

There was a thing that J.F. did that was done
before consulting Stoen first.

Constantly advise the Temple in all legal matters.

J.F. left all legal matters to him.

FF-2-~~44~~ 11/18 21B

• Affidavit of Mike Prokes, page 2

ciples of Christ). Virtually everything I did had some legal aspect which as Church Attorney he instructed me to check out with him, and I did so.

All references in this affidavit to Tim or Tim Stoen are to the defendant Timothy O. Stoen. All references to "the Church" or to "Peoples Temple" are to the Plaintiff Peoples Temple of the Disciples of Christ, a California Corporation.

ex. 2.c. 9/5
OK WS 9/5

FF-2-*[initials]* 212
[initials]

Affidavit of Eva Fugh:

I am a retired rest home operator, and have been a member of Peoples Temple^{the original life & medicine organization} since 1953. I have known Tim Stoen^{the P.} since he joined the Church sometime in 1969. (Heckman's book Temple)

I was the financial secretary for Peoples Temple from 1965 through 1976 and routinely received, banked, and disbursed Temple funds. I regularly got advice from Tim^{Stoen} on how to handle bank accounts, how to keep books for the Church, and on my other duties. In fact he set up several bank accounts for the Church and also set up a simple set of books which I followed. He was familiar with all of the church financial affairs.

Over the years I gave him monies for various purposes: travel expenses and so forth. These expenses would often be \$500 dollars per month. He received cash. Often he could not account for his disbursements, but at times gave adequate accounts. I never pressed him for receipts.

In 1976^{my husband and I} we sold our rest home in Mendocino county, and a lawsuit was later^{agreed to} filed with respect to the transaction. Tim assisted me in the handling and disposition of the suit.

In 1976 he arranged with the Bank of America for me to be the signatory to deposit the checks of many of the members who had gone to Guyana, and also drew other financial documents with respect to banking for me. Once during 1975 or 1976 the church gave a man a check for \$2500 as a deposit on the purchase of an airplane. The transaction proved a fraud and Tim helped to get the money back through bringing criminal charges against the man.

di. 55-7/5

1 of 1

FF-2-A 22

Affidavit of Joyce Parks:

I am, by occupation, a Registered Nurse and Nurse Practitioner. I have been a member of Peoples Temple since 1949. I have known Tim Stoen since he joined the church in 1969. Very soon after he joined, Tim became the attorney for the Church. He was the only person with legal knowledge in the congregation. He continued to function as the principal attorney for the Church until sometime in 1977 when he left.

During the years when Tim was our attorney the Church carried on a variety of para-medical programs. Since there were many legal implications to this activity we always sought and received legal advice from Tim. He drew, at our request, a variety of authorizations, releases and other legal documents to facilitate our program.

Tim would also handle the legal affairs of many members of the Church. Frequently these matters were in connection with some established church program. For example, over the years the church has been very concerned with the care and protection minority and disadvantaged children. Many members volunteered to raise such children. Tim Stoen consistently gave legal advice with respect to custody matters involving such children and represented the involved adults in Adoption and Guardianship proceedings, or drew pleadings for them and told them how to represent themselves. In my case he represented my husband and myself in court for the adoption of my son J. Warren Parks in, as I recall, the last part of 1974 or early 1975. These child help programs were consistently referred to by Tim as "church programs" and the church had a very good reputation in Northern California with respect to the care of children.

In the summer of 1973 I was at a church service in Los Angeles when there was a near riot in front of the church. As a result certain church members were detained by the police and two arrested. I was with Tim when he went to the police station in Los Angeles as attorney for the church, Rev. Jones, and certain members to represent those persons with respect to that incident.

(Reference paragraph)

191

OK ES 9/5
FF-2-664 23

OK 10/10/75
Affidavit of Linda Sharon Harris, a.k.a. Sharon Amos:

of Christ (Peoples Temple)
By occupation I am a social worker and have been a member of Peoples Temple *of the District* since 1966. I have known Tim ^{Stoen} since 1969 when he became a member of the church. *I have been a member of the Board of Directors of Peoples Temple for the last four or five years.*

Part of Tim's responsibility was to give legal advice to various members of Peoples Temple. He gave me advice over the years about a variety of legal matters including child support, an employment problem with the Mendocino County Welfare Department, *and represented me in an adult adoption proceeding.* He also advised me with respect to the legal problems of a number of church members that I was assisting in social work areas.

Later, in 1975, when most of us ^{including Tim Stoen} had moved to San Francisco from the Mendocino County area, he accompanied me and several other church members to a grammar school in the San Francisco Unified School District where he met with school officials to discuss the problems of ~~the~~ several children whose parents were church members. He there introduced himself as the attorney for Peoples Temple. I also attended numerous ^{public and private} social affairs with him ~~public and private~~ in 1975 and 1976 where he introduced himself as the attorney for Peoples Temple.

At one time in 1975 we were planning to start our own private school for certain children of Temple parents who were experiencing trouble learning in the public school system. Tim gave us legal advice on how to establish a private school. He was particularly knowledgeable in this area because he had represented all of the school districts in Mendocino County while working there.

During 1975 we had developed a sort of team approach to counseling, especially of the poor due to the cross-disciplinary nature of their problems. A team of three including an attorney or para-legal, a social worker and a secretary would interview. I often worked on a team with Tim in 1975 and 1976, as he was very much involved in the program. We interviewed ~~many~~ ^{of whom were} and advised hundreds of persons, many members of the church.

In 1973 when the Church Board first conceived of the idea of establishing an Overseas Mission, Tim reviewed the laws of a number of ~~many~~ nations and advised the Board concerning the legal and political affairs of the nations

D.L. 10
Affidavit of Linda Sharon Harris: (page 2 of 2)

reviewed, including Guyana.

He participated in the selection of Guyana as the site by coming to the country
as part of a team ^{which included myself} and doing a legal evaluation of its laws and regulations and
their probable effect on the mission development. He recommended a legal str-
ucture for the formation of the Mission organization. After Guyana had been
selected ^{as the mission site} he prepared a variety of legal forms including powers of attorney, consents,
authorizations and releases all of which were used in arranging or assisting persons
to come to Guyana. He also assisted in obtaining passports, and gave me legal
advice ~~on obtaining visas~~ and wrote up affidavits which were used to obtain
passports. He counseled persons concerning dealings with creditors, sale and dist-
ribution of assets, tax and other matters germane to winding up their affairs
in the U.S.A. In my case I had a problem in obtaining my passport and he gave
me legal advice and wrote up some affidavits that were given to the Passport
Department which assisted in obtaining my passport.

*OK. EC. 5/15
DLH 4/8/5*

FF-2-24B

24
Affidavit of _____, a.k.a. *heikin* Tish Le Roy: *a.k.a. ex...*

I first attended Peoples Temple of the Disciples of Christ ("the church", "Peoples Temple") services at the Embassy Ballroom in Los Angeles, in 1971. Soon thereafter I attended services in Redwood Valley. It was ^{one of those} occasions that someone introduced Timothy O. Stoen ^("Tim Stoen" or "Tim") to me as the church attorney and the Assistant District Attorney for Mendocino County. I am skilled as a secretary, office manager, and full charge bookkeeper. ~~At that time~~ During trips to Redwood Valley in the first half of 1972 I did legal secretarial work for Tim, ^(sometimes "Gene") and Gene Chaikin/as well when he was there on some weekends. I particularly remembered typing an offer to purchase real property dictated by Tim and Gene. It was complicated and took almost all night to complete.

Later in 1972, In august I beleive, I and my family mooved to Redwood Valley. I did so at the request of Tim Stoen and Gene Chaikin because there was so much ^{legal} work to do that they couldn't get it all out. ~~From~~ ^{I worked primarily with Gene, but also with Tim} that time on I have been a staff worker for the church. ^{Tim also had other secretarial assistants, but with me} Tim used to work at night because he had his District attorney job during the day. ^{He} usually listed Gene as attorney on most things, primarily he would say because of his job. Often Gene was never even there and Tim would instruct me to put Genes name on the letter, document or as attorney of record in cases that in fact Tim Stoen advised, strategized and dictated documents on.

On legal issues and on insurance matters Tim was always consulted. Even when Gene handled the matters, Tim was always consulted and insisted that on every occasion he review anything that Gene did before it would go out. Usually Tim wrote things out ... he was not too ^{good} at dictation and there was always a first draft for him to correct if he had dictated a document. More often, he would write out the first draft of a document, and dictate subsequent drafts from the corrected copy, often as he and Gene would discuss it.

There was always more legal work than I could ever ^{keep} ~~keep~~ up with. When Gene was in Guyana -

(17-)

FF-2-~~114~~

JE
Affidavit of Tish LeRoy: (2 of __)

Tim did all of the legal work for the church as well as all of the parishioners. He gave me a standard will form to use. I recall in all matters of the churches corporate minutes he dictated those to me -- or corrected the minutes I wrote myself from the meetings -- and then signed them. During this time he advised on all financial purchases, legal issues, insurance matters for the church, disputes with vendors (for example the dispute with a vendor over a large purchase of bus tires which turned out to be defective), motor vehicle laws, and other regulations pertaining to the operation of the buses.

Later, when I did most of the accounting work for the church, I also had side jobs involving various church publications. I was in constant contact with Tim concerning these subjects. There was never that a week went by that I did not confer with him -- except when he was out of town. He personally read the paste ups of all publications and approved them before they were printed. In all of these activities he persisted until he left for Guyana in the early part of 1977.

*OK
MC ER*

FF-2-44-25B

**

Affidavit of Elois Christine Young, formerly Elois Christine Cobb: (1 of 2)

*Excluded
J. J. Davis*

I am a licensed vocational nurse. I have been a member of Peoples Temple ^{the Disciples of Christ} since 1956 and have known Tim Stoen ^{Tim Stoen, Tim} since 1969. He acted as my lawyer on several occasions. ^{the Disciples of Christ}

In about 1970 I began to divorce my then husband James Cobb and retained Tim Stoen for that purpose. Although another attorney completed the matter Tim instructed me and several of my children on how to testify in court, and had a number of church members to come to court to give moral support.

During the years 1970 to 1973 my son Jim Cobb was a student being supported in school by Peoples Temple. ^{His politics were extremely radical.} At times he caused difficulty for the Church by talking violence and Tim spoke to him about this several times. In mid 1973 Jim Cobb, with several others, ^{young church members} left the Church carrying with them a considerable quantity of guns and ammunition, saying he intended to form a rural guerilla band. At that time I, with several others in the church consulted with Tim with respect to our legal position, the position of the Church, (least it become involved), the position of Tom Kice from whom they took a rifle, and the position of Jim Cobb himself - hoping to prevent him and the other young people from doing something foolish. Tim Stoen spent hours with us advising and working out arrangements to help protect all concerned. Under his advice a report of the incident was made to the Sheriffs Department.

A couple of years later, when Jim Cobb began systematically contacting people and making derogatory statements about the church and its members I frequently consulted with Tim Stoen on how best to handle the situation to protect the good name of the church against Jim Cobb's attacks. During those meetings Tim frequently told me that I should be careful in any dealings with my son Jim, that ^{he} Jim was an incorrigible liar and that I should not believe anything he might say to me. He told me many times that my son Jim was saying many totally false and vicious things about the church, Reverend Jones, and several members. This is the same Jim Cobb that he is now representing in a lawsuit against Peoples Temple. ~~for defamation, among other things.~~

Affidavit of Elois Christine Young: (2 of 2)

From time to time I was harrassed by my ex-husband James and I consulted with Tim when these episodes occurred. He also assisted me in a bankruptcy proceeding, and gave me advice on a probate proceeding in which I was an heir, as well as other legal advice. *He never charged me, only church members to my knowledge for legal work. I was all set free as one of several church service programs.*

On August 1, 1976 he performed the marriage ceremony between myself and my present husband. (He was also a minister in the church ordained by the Disciples of Christ.) We were rather close friends, as well as co-workers in the church and ~~as well as being my attorney~~ ^{additionally he was} down through the years. I last saw him in church in ~~12~~ February of 1977 when he told the congregation that he was going to Guyana to work with the church there.

ok sc e/h

FF-2-WA-26B

AFFIDAVIT OF MATTIE GIBSON

Page 117
of the Douglas & Christ Church Temple

I am a retired cook. I have been a member of Peoples Temple since 1972. I have known Tim Stoen from that time until sometime in 1976. He was introduced to myself and others as the attorney for Peoples Temple. To the best of my recollection, ~~xxxxxx~~ sometime in 1974 I asked Tim Stoen for his legal opinion regarding the sale of some property I owned in Fresno, California. He gave me his legal opinion and advised me about the sale of my property. This consultation took place in Los Angeles California.

~~xxxxxx~~

Frequently, over the years, I heard Tim Stoen speak as the attorney for the church in services and meetings at Peoples Temple churches, giving legal opinions and advice on church affairs, as well as the legal affairs of individual members.

They wont send this without the amount
ORDER: VALIUM Injectable - #200 vials 10mg each

AFFIDAVIT OF BERNICE THOMAS

Rec'd 9/3/77

I am a retired practical nurse. I have been a member of Peoples Temple ^{of the} since about 1969 and I have known Tim Stoen from that time until about ^{beginning of last year - city} January of 1977. ^(Northridge, Calif.)

I was referred to Tim Stoen by members of Peoples Temple as the attorney for Peoples Temple. In 1972 Tim Stoen gave me legal advice about the purchase of real property in Redwood alley with a G.I. loan.

In late Spring of 1975 Tim Stoen gave me legal advice regarding an offer I had received from a song publishing company in Los Angeles.

In 1976 I was involved in a car accident in San Francisco, California.

Tim Stoen gave me legal advice about both the accident and the settlement of offer.

In 1976 Tim Stoen gave me legal advice about a claim I had against ~~some~~ property in Wescom, Texas. Tim Stoen took ~~the~~ the lease and some other ~~pr~~ papers from me and agreed to look into the matter for me.

Tim Stoen would speak as the church attorney, giving legal advice and opinions on church affairs during public church services at the Peoples Temple churches on many occasions over the years. He also advised ~~individual~~ individual members on their legal affairs as apart of his regular function of church attorney. *He has charged for his legal work for Peoples Temple members.* *OK, P.C. 9/4*

FF-2-92

Affidavit of Annie J Rozyngo

rough
of the disciples of Jesus
(the church, Peoples Temple)

I am a Registered nurse. I became a member of Peoples Temple in 1970. I knew Timothy O Stoen, ^(Tim) before he came to the Temple as he was a friend of my husband's. Around 1966 Tim was working with Legal Services. Tim, my husband, and I began going to legal services - ^{Peoples Temple} the Temple at approximately the same time. Soon after that, I became aware of the fact that he was representing Temple members in legal matters.

I divorced my husband and around 1971 or 1972, he indicated that he wished to reduce child support payments. Tim advised me ^{best} how to handle the child support situation.

Again in 1973, Tim advised me on a legal matter. My mother died; I consulted Tim for advice regarding my mother's estate and the execution of her will. He discussed the matter at length with me at the time.

In 1974 or 1975, my job at Medical Center Convalescent Hospital in San Francisco was in jeopardy and I sought and received legal advice from Tim regarding the best way to secure my position with the hospital. He told me how to proceed with in dealing with the administrator of the hospital including preliminary steps to take regarding a civil suit against the hospital if that became necessary.

He advised and assisted me, as all Temple members, without charge.

FF-2-104K 80 7/5
OK WS 9/5

AFFIDAVIT OF HELEN SNELL

Page 10 9/3 HT
of the Disciples of Christ

I am a retired person. I have been a member of Peoples Temple since 1971 and I have known Tim Stoen since that date, and until 1977.

He gave many, many parishoners legal advice. I sought his legal advice about an auto accident case in 1975. We discussed my case, and he gave me his legal opinion. He referred me to an attorney in San Francisco to handle the case.

OK E.C. 9/5
ON HT

FF-2-105

Rough 9/3 HT

AFFIDAVIT OF FRANCES B. DAVIS

of the Disciples of Christ (The Church)

I am a housewife. I have been a member of Peoples Temple since 1972.

I have known Tim^{HO-} Stoen since then,; he was introduced to me as the attorney for the church.

My husband and I received legal advice from Tim^{HO-} Stoen about a pension fund problem in 1975. Tim^{HO-} Stoen gave legal advice to many members of the church Peoples Temple, often after church services.

ok 9/15
on HT

FF-2-106

AFFIDAVIT OF GEORGIA LACY. ---

of the District of Columbia
I am a housewife. I have been a member of Peoples Temple since 1969. ---
I have known Tim Stoen ^{Tim Stoen} since he joined Peoples Temple in 1969. I was referred to him by a member of the church as the attorney for Peoples Temple.

In 1972 and 1973 Tim Stoen gave me legal advice about a real property matter. He gave me legal advice in 1974 about the guardianship of children. In 1975 and 1976 He ~~gave~~ again gave me legal advice about domestic relations problems with my husband, George Lacy. In 1972 or 1973 he gave me legal advice about the operation of a care home. *He never charged for these services.*

Tim Stoen often spoke as the Attorney for the Peoples Temple in church services. I have heard him give legal advice and opinions on church affairs as well as on the affairs of individual members.

OK EC 9/15

OK HT

FF-2-107

9/3

NT

AFFIDAVIT OF PATRICIA LEE GRUNNET

By profession I am a primary school teacher. I have been a member of the Disciples of Christ Church, Portland, Ore. since 1972. I have known Tim Stoen since 1971. I was referred to him and to the church for help by Karl Irvin, President of the Disciples of Christ in Northern California which is the Denominational Regional Organization. I met Tim Stoen as the attorney for Peoples Temple and explained to him that my boyfriend was in prison and I was anxious to secure his release. After several consultations Tim Stoen wrote the Federal Parole Board on behalf of the Peoples Temple, offering, on behalf of the Church, to be responsible for my boyfriend if they would see fit to parole him. He also did this on a number of occasions with respect to other prisoners over the years.

I frequently, almost weekly in fact, attended church business meeting from 1973 to 1976, where Tim Stoen gave organizational business advice as the church attorney.

O.K. E.C. 3/5

FF-2-108

17-1
10/1/77
AFFIDAVET OF MAGALINE LYLES- -

I am a housewife. I have been a member of Peoples Temple from 1972 until the present. I have known Tim ^{of the Disappearance of Client (7/2/77) (over 6/7/77)} Stoen ^{Fe 10. ("Tim Stoen")} from that time until 1977. During that period, I was introduced to Tim ^{Stoen} as the attorney for the church, and I heard him introduce himself in like fashion in many public church services.

On several different occasions throughout 1975 I consulted Tim Stoen about obtaining my husband's disability payments and Tim Stoen gave me legal advice on the matter.

Over the years Tim Stoen spoke as church attorney on numerous occasions, giving legal advice and opinions on church affairs during services and meetings held at the various Peoples Temple churches. I heard him do this, myself.

pk 2.4 9/5

FF-2-109

Affidavit of Alma Coachman Thomas

I am retired. In September, 1971, I joined Peoples Temple. I was introduced to Timothy O Stoen as the Temple attorney in 1974.

In 1974, he advised me concerning eligibilty for Aid to Dependent Children Supplemental (which is now known as ~~Social~~ Security Income).

In 1976, he advised me again concerning the transfer of real property.

OK SC 9/15
- 1 -

FF-2-110

AFFIDAVIT OF LAURENCE SCHAGHT, -M.D. *Ray 7/7/77*

By profession I am a medical doctor. I became a member of Peoples
a/ the Disc. of Ch. of "The Church of Christ" (aka Peoples Temple)
Temple in 1971 and I have known Tim ^{J.D. (aka Stoen)} Stoen from that time until 1977.

When I first came to Peoples Temple I had been a passenger in a vehicle involved in an auto accident. I had started a lawsuit, a claim for damages. I consulted Tim Stoen about the suit and he gave me legal advice.

I was in a number of business meetings over the ensuing years where Tim Stoen talked as the lawyer for the church, giving legal advice. I ~~heard him~~ heard him discuss business transactions, the conduct of litigation, legal regulations, and give opinions on various laws and tax regulations.

ok. e.c. 9/1/77 FF-2-111

Affidavit of Geraldine Bailey

~~By profession~~ I am a retired Deputy ^{Mr.} Marshall (Los Angeles County). I joined the ^{the Disciplinary Committee (the Temple)} ~~the~~ ^{Timothy D.} ~~the~~ Temple in 1971 and in 1973, I was referred to ^{Mr.} Stoen by a fellow member. He introduced himself as the attorney for the Temple.

In 1973, I was involved in a civil suit in which it became necessary for me to answer interrogatories. Tim advised me in the answering of the interrogatories.

OK SC 9/5
OK :

FF-2-112

Aff idavit of Selika Bordenave

negh 7/3
86

By profession, I am a retired mens' suit inspector. I became a member of
of the *Dissemination* *Chief* *no.*
Peoples Temple, in 1972. I met Tim Stoen on July 10, 1972 when I stayed overnight
at his house in Redwood Valley. At the time, I had just joined the Temple.

So what

*DO NOT use -
NO J21
NO E C, agreed HT
DO NOT use*

FF-2-113

Kough 9/3 HT

AFFIDAVIT OF MARYANN SCHEID CASANOVA

By profession, I am a medical assistant. I have been a member of Peoples Temple since about 1971, and I have known Tim Stoen ^{J.D. (Tim Stoen)} from that time until 1977.

-- Sometime in 1973 ~~and~~ on 1974-I spoke with Tim Stoen about the custody of my child-Sophia. Tim Stoen gave me legal advice on what I should do. --
-- In 1974 I received Tim Stoen's legal advice about my husband's failure to pay child support. He got copies of my husband's divorce decree, and he gave me legal advice on what I should do, on several occasions. Sometime in 1975 Tim Stoen ~~again~~ again gave me legal advice about my status as a welfare recipient, and the payment of ~~child support~~ child support. Tim Stoen dictated a letter for me to send to my brother's attorney in Beverly Hills, California, as my ex-husband was making the child support payments to him.

In 1973 I participated in a picket line ^{organized by Peoples Temple} around the San Francisco Examiner Building. Tim Stoen was present and gave legal advice concerning the conduct of the picket line. Tim Stoen also spoke to policemen there, and identified himself as the attorney for Peoples Temple.

OK 10/5
OK-H

FF-2-114

Affidavit of Ruby Carroll

J6
1/15

I am a seamstress. In 1969, I joined ^{of the Disciples of Christ} Peoples Temple and one year later was introduced to Tim Stoen as the Temple's legal counsel.

In 1975, he advised me in a civil suit I was bringing.

It/ Around 1970, he drew up guardianship papers for my son, John Gardner.

He also advised me from time to time about various legal affairs of my children and their companions.

OK SC 9/5

FF-2-115

*Public
9/5
47*

AFFIDAVIT OF EXIA MARIE DUCKETT aka MARIE LAWRENCE

of the Discipline of Christ (The Church)

I have been a member of Peoples Temple since 1972, and I have known known Tim Stoen since that time. He was introduced to me as the church attorney.

In 1972 I consulted Tim Stoen about my prior narcotics and other convictions. In 1973 he gave me legal advice about a welfare problem, and in 1975, in December, he gave me legal advice about a problem involving an automobile accident.

The church was very successful in rehabilitating me, and a number of others suffering addicted to drugs. A major T.V. network did a story about it, and Tim Stoen spent hours with me, preparing me to do the T.V. story.

ok cc. 3/5

FF-2-116

9/3 Rough
AFFIDAVIT OF CHRISTIAN ROZYNKO

By profession I am an electrician. I ~~xxxx~~ became a member of
of the Disciples of Christ, a Col. Corp. Peoples Temple, "National" (of Israel)
Peoples Temple in 1970. I knew Tim Stoen ^(Tim Stoen) from about 1969 until 1977.

He was very instrumental in my joining the church. Tim Stoen told me
that he was acting as the attorney for Peoples Temple.

Over the years, my father, Vitali Rozynko, although divorced from
my mother for some time, was continuously hostile towards the church, and
my mother, brother, and sister's participation in it. Periodically I con-
sulted Tim Stoen on how the situation should be dealt with in the event
he should attempt to use any legal device to restrict my participation
in Peoples Temple. I received legal advice from Tim Stoen on what might be
done if such an attempt were made, and how to avoid or prevent matters
from reaching that point. More than once he indicated to me that there
were other young persons in the church who feared a similar problem and that
he and Eugene Chaikin had done considerable research on the subject, and that
they were in a position to deal with it.

I also received legal advice from Tim Stoen regarding financial problems
I was having. Tim Stoen gave legal advice to church members on a regular
basis as part of the program of the church. He also publicly gave legal
advice and opinions on church affairs as the ~~chief~~ attorney for Peoples
Temple over the years. I have heard him give such advice and opinions myself.

FF-2-1174. 44. 44

Affidavit of Cathy Barrett

OT? *Break. of the Dismissal of 1970.*
~~By profession~~ I am a waitress. My family joined the Temple in 1955. I met Tim Stoen *Tim* in 1970 when it was announced by Tim that we could consult him for legal advice.

~~1970~~ Tim asked me to speak to a Mendocino County sheriff who was a friend of mine in order to get the sheriff to drop the charges against a client of Mr Stoen's.

This occurred in 1976.

*DD
WIT
USE - Consult
EC.
FF-2-118*

JOHNNIE-MAE YATES

Rough HT 9/13

By profession I am a physical therapist. I have been a member of
of the Disciples of Christ (The Church) *July 10.*
Peoples Temple since 1970 and I have known Tim Stoen from that time
until 1974. He was introduced to me as the church attorney.

In 1973 I was injured in a car accident ~~and~~ and I consulted
Tim Stoen about the possibility of bringing suit. He gave me
his legal opinion on the matter and advised me about the steps I
would have to take. He then referred me to a lawyer in Los Angeles.

In 1974 I consulted Tim ^{July 10.} Stoen about I back surgery I had had, and
the possibility of bringing a suit for medical malpractice. He gave
me legal advice on that matter as well.

o.k. e.c. 9/15
OK H

FF-2-119

AFFIDAVIT OF JULIA BIRKLEY

HT Rues 9/4
of the District of Columbia (Washington, D.C.)
...I am a retired bookkeeper. I joined Peoples Temple in 1971 and I
have known Tim Stoen^{the 10. (Tim Stoen)} from that time until early 1977. He introduced
himself to myself and others as the attorney for the church. He often
referred to himself as such in church services.

In 1974 I consulted Tim Stoen about an insurance policy. I received
legal advice from him regarding this insurance policy and my financial af
fairs.

Over the years I often heard Tim Stoen speak in church services
at the Peoples Temple churches as the attorney for the church and give
legal advice and opinions on church affairs.

ok. E.C. 5/5
C

FF-2-120

Affidavit of Leon Perry

I am a professional truck driver. I joined Peoples Temple in 1971. I met Tim Stoen in the same year; he was introduced to me as the attorney for Peoples Temple.

In 1971, I was involved in a truck accident and he gave me legal advice on the matter. I also consulted him around that time about a divorce and the possibility of bringing a civil suit for the failure of a contractor to repair my house properly.

FF-2-121

could
Contact Mike Klingman
because he gave him
advice how to avoid
the draft. Mike was
down to 55 days before
being called in the
service and I think

KK-2-125A

Jim wrote a letter
to the government
concerning Mike's case.

Ellen

FF-2-125B

Affidavit of Debbie Schroeder

By profession, I am a school teacher. I have been a member of Peoples Temple since 1972. I met Tim Stoen in one of the meetings when he was introduced to me as the attorney for the Temple.

In 1974, he advised me to call the sheriff when my husband had gotten lost in the mountain for 24 hrs. He advised

plaintiff of the Director of the Dept. of Corrections

U

Q

Q: When did you join the Disciples?

FF-2-1000126

AFFIDAVITS

Maria K.

- A. Conversations re TOS in SF Fall 1976; ~~1977~~
 1. - asked advice
 2. - what he advised her on
- B. General facts - TOS gave legal advice, it appeared, familiar re her case; Medlocks; - copy etc.
- C. Knew TOS; gave - say John is John's child
- D. Gov't & meetings TOS given legal advice
- E. Finance - always went to go to TOS for legal advice re: ch. matter - as late as Fall 1976 had asked TOS'd advice re: ch. legal matter + had always rec'd it
- F. One came to for a guarantee to the above, but father-concealings. Only one way of obviously remove from picture of etc.
- G. Being better that he (TOS) and use this one told her in confidence. He told her in confidence. Impediments of returning to US by Dr. he now represents her father said ready & willing to give depositions in Guyana concerning One's matter.
- A. Present when TOS advising re Medlocks (perhaps)

Theresa Casper

- A. Law Office - TOS present - describe memo - advice re Medlocks - other matter
- B. Generally describe his role as atty for PT as she said it in her role as legal secretary from Mendon's day as down. She said describe in detail the kinds of matters he dealt in based on her father's dictation for govt - Property transfer /
- C. Describe account that went on around name of someone called + spec. disclosures of Maria's case.

FF-2-127A

1. TOS's general level of knowledge
concerning Temple affair.
also abt John.

III. Aunt Topsy

- A. ~~Exp~~ Background - OCB, Harney resant
and law clerk
- B. TOS's general background + activities -
COOB, Medbury, in Kansas (specifically
the April mtg.)
TOS talked to med abt min prop transfer
on behalf of church.
- C. John - Jim's child (KOR. TOS + Jane)

IV. Clara Johnson

- hospitalization to Medbury
- she had extensive dinner = men
they told her that TOS had come to
them + solicited that they sue the
church.
- Present at mtg in LA where TOS, acting
as atty for PT, discussed transfer =
Medbury.

V. [JIM]

- A. For yrs pres of corp + under = the Board
~~had authority~~ + TOS controlled all the legal
affairs + TOS assisted him. Had intimate
knowledge.
- Jim consulted him on all legal issues,
took his advice.
- Specifically = report to proposed Medbury
gift + TOS advised it could be legally
sound to accept + suggested methodology
+ appropriate documentation be used.
- TOS handled every aspect of legal
work of church + many of its members.

FF-2-127B

del ~~clerk~~ house to PT: maybe german
if that if he dees he property he wd want
to do same.

ASK: TOS if signatory on any acct

BA ← Ukiah Branch #127 - copy of ~~depo~~ bank
card. - a children's concern stand in Ukiah...
ask if any other accts he had by name on.

some of DEAD REAL EST. FILES, SIGNED BY
TOS AS CHM OF BOARD, EARLY TAX FILES,
may have DECLARATIONS SIGNED BY STON.

FF-2-127C

II Jim-

~~consulted TOS as a lawyer~~
Mama consulted him as a partner in
Jama + Jim consulted TOS as lawyer
concerning joint bank acct. right
take + rec'd legal advice from him
in April 1977 mfg.

ASK BEA: all about TOS - law office
see what she remembers

III Tish

- + Bookkeeper
- Const. consulted TOS re: how diff. business records
should be kept.
- Advice concerning certain tax matters re: respect to the
church
- insurance - neg for insurance - gave legal advice to TOS

KAY - ask whether TOS ever advised her
regarding any real estate transactions

June shd check out lawsuit ~~and~~ in Memo. ~~that~~ TOS did for PT:

IV Richard Janaro

- new long member
- much / TOS activities legal adv re: respect to
operation involved in purchase for PT
- TOS handling lawsuit.

V PROKES

- advice both legally + otherwise re: PR
- ~~insurance~~

FF-2-127D

AFFIDAVIT OF FRANKIE GRIGSBY

Rough 9/2 NJ

By profession I am a retired cook. I became a member of Peoples Temple of the Disciples of Christ (Inc.) sometime in 1969, and knew Tim Stoen from that time until he left for Guyana in February 1977. Tim Stoen had been introduced to myself as the attorney for Peoples Temple.

Sometime in 1974 I was injured on my job, at Trinity School in Ukiah. I consulted Tim Stoen for his legal opinion, and we talked on more than one occasion about the accident. He gave me legal advice on how to proceed so I could get some compensation for the injury. He eventually referred me to another lawyer, who took the case. Tim Stoen told me that he had talked about my case with this attorney, and when I was offered a settlement, Tim Stoen reviewed the offer, and gave his legal opinion that I should accept it.

Tim Stoen would often speak in church services at the different Peoples Temple churches as the attorney for the church. If a legal opinion was asked for about church business ~~xx~~ he would give ~~xxxx~~ his legal opinion and advice. He also gave legal advice to many individual church members, both during and after church services.

ok 5/5 SS.
fr 9/5

EX-2-128

AFFIDAVIT OF BARBARA CORDELL

Rough - 9/6/77

and a housewife.
By profession I am a pre-school teacher's aide. I have been a member of Peoples Temple since 1968. *of the District of Columbia (Hill, Carter, etc.)* I have known Jim Stoen *Tim Stoen* since he joined the church, in about 1969, ~~xxxxxxx~~ As I recall, not long after he ~~xxxxx~~ became a member he ~~xxxxxxx~~ ~~xxxxxxx~~ ~~xxxxxxx~~ became the attorney for Peoples Temple, and represented himself as such.

In June of 1974 I spoke with him about obtaining guardianship over I child I was caring for. He gave me legal ~~xxxxx~~ advice regarding this, and directed June Crym, a legal secretary and a member of the church, to draw up guardianship papers on my behalf. ~~xxxxxxx~~ He was with me at the court hearing in San Francisco, and advised me on what to say to the judge.

attended numerous business meetings
I was on the ~~xxxxxxx~~ Governing Board of Peoples Temple from May of 1973 until it ~~ceased~~ to function, sometime in 1977. Tim Stoen was also ~~at that~~ *Head of* ~~those meetings~~ *participated* Board, which met weekly. He attended most meetings until he left for Guyana in Feb. 1977. At each meeting, Tim Stoen would be called upon to give, and would give, legal advice and opinions regarding church affairs, including the purchase and sale of real property, corporate matters, *public relations and radio broadcasts*, public relations, *with which we were* /, and other church business. Even if he were not present, if a legal opinion were called for, he would be telephoned from the meeting, and asked his opinion.

OK 9/6/77
HT 9/6/77

PK-2-129

Rough 9/2 44

AFFIDAVIT OF BRENDA JONES

By profession I am unit assistant for hospital central supply.
I have been a member of Peoples Temple since 1972 and I have known Timothy O. Stoen from that time until 1977. I was introduced to him as the attorney for the church.

In 1975 I received legal advice from Tim Stoen on my status as a welfare recipient. I spoke with him about the matter subsequently and he gave me further legal advice.

I have often heard Tim Stoen speak as the attorney for the Peoples Temple at meetings and services in the various churches, giving advice and opinions on church affairs. Whenever a legal opinion was called for, Tim Stoen would give that opinion.

ok. E.C. 9/5
OK AT

44-2-130

Handwritten signature and scribbles at the bottom of the page.

Affidavit of Irene Edwards

Peoples Temple / the Disciples of Christ ("the Temple")

I am a ~~member of~~ cook. I have been a member of ~~PT since~~ since 1970. I knew Timothy O. Stoen was the attorney as he had publicly announced in church services that he was the attorney for the Temple.

In 1973, Tim Stoen came to me and my husband and ~~advised us to sell our rest home and move to Redwood Valley, Ca.~~ He also gave us legal advice on some property we were thinking of purchasing. ~~Tim, my husband and I~~ *advised us on the operation of our cane house.*

In 1977, ~~we~~ *Tim, my husband and I* traveled from Georgetown to Jonestown, Guyana together. we had numerous conversations at that time and we became close friends.

*OK ES 7/7
OK HS 7/7*

FF-2-131

AFFIDAVIT OF BONNIE JEAN SIMON

Rough 9/2 HO

of the Discipline of Christ (The Church of Christ)

By profession I am a housewife. I have been a member of Peoples Temple since September of 1975, and I knew Tim Stoen^{JE/O} from that time until late in 1976. He introduced himself to me as the attorney for Peoples Temple. (Tim Stoen)

At Periodically through 1976 I talked to Tim Stoen about my ~~brother-in-law~~

~~brother-in-law, Ray Simon's~~

brother-in-law, ~~Ray Simon's~~ Ray Simon's, divorce case. He gave me legal advice on the case, and agreed to handle the divorce. He drew up some papers

and arranged a court date. ~~Tim Stoen~~ Tim Stoen also gave me legal advice on a child custody matter. *This advice and assistance was always given without charge, as part of the church program.*

During the period I knew Tim Stoen, ~~he~~ would often hear him speak in Peoples Temple services and meetings as the attorney for the church, giving legal advice and opinion on church affairs as well ~~xxx~~ as the legal affairs of various members.

*ok. ss. 9/4
OK HO*

PK-2-132

AFFIDAVIT OF THOMAS R. FITCH

HT Rough
9/2

By profession I am a welder. I have been a member of Peoples Temple since February 1973, and I have known Tim Stoen since that time until 1977.

In Sept. 1974 I was involved in an automobile accident. Tim Stoen gave me legal advice and opinions on my legal position, and what I should do about the matter. He drew up a statement for me to sign about the accident, which I did sign.

Frequently, over the years, Tim Stoen, speaking as attorney for Peoples Temple in public church services and meetings at the various Peoples Temple churches, gave legal advice and opinions about church affairs, in addition to advising individual church members about their legal affairs.

ok. E.C. 9/5
AL HT

FF-2-133

Rough HT 9/2

AFFIDAVIT OF STEPHEN ADDISON

By profession I am a psychiatric technician. I have been a member of ^{of the Disciples of Christ (The Church of the People's Temple)} Peoples Temple, since 1959 and I have known Tim Stoen ^{Tim O. (Tim Stoen)} from 1959x around 1969 to 1977. ~~xxxx~~ After joining the church, Tim Stoen very quickly became involved in church affairs and was introduced to myself and others as the attorney for Peoples Temple.

In late 1971 Tim Stoen gave me legal advice on obtaining a divorce and appeared on my behalf in the Superior Court of Mendocino County in the matter, in front of Judge Brauddus.

Over the years, Tim Stoen frequently gave legal opinions and advice on church affairs, speaking as the attorney for the church in public church services in the Peoples Temple churches, as well as giving such advice and opinions to individual members.

OK. E.C. 9/5
DU HT

FF-2-134

Pough
7/2/80

x an attorney

Harold Cadell (41 yrs old 25C)

Background: Active with C.T. since 1975. Trained to do cost accounting. Worked with books and records of C.T. since 1971, as a part time volunteer function, and on a full time basis since about March of 1975. I have known Tim Stoen since 1970. Shortly after he became a member he became active in the central organizational structure because of his legal background and qualifications. He was the only attorney for the church for all tax and corporate functions till June 7th of 1972 when Gene Chalk began to help, and was for 1972 to Aug 1975 while Gene Chalk was in Aug 22. Untill 1976, during the periods when Gene Chalk was active in Chalk affairs in the U.S. Stoen acted as senior counsel. As such, he was requested with and participated in all church legal problems.

I can recall being advised by him and working with him in: 1) Church tax returns during 1973, 1974 & 1975; 2) with respect to corporate and financial affairs during 1973, 1974, 1975 & 1976; 3) with respect to church insurance which he reviewed and approved for during 1973, 1974, 1975, 1976; 4) with

FF-2-135A

⑦ Church litigation and any claims made against the Church.

regard to tax returns for individual members which were done on a volunteer basis during the same years as) with respect to the management of Church owned real properties during 1973, 1974, 1975, 1976) during those years he either handled or supervised all of

¶ During the years 1972, 1973, 1974, 1975, 1976, to my knowledge, as an Attorney, he spent at least 20 hours per week. Next to Rev. Jones, he was the single person most acquainted with the total program of Peoples Temple Church because he would give

"legal clearance" on every proposed program. ¶ He gave "legal review" of every active Temple church program.

¶ During the years 1970-1976 he was ^{usually} available before, during and after Church services (Sundays, Sat ^{adventures} nights, Weds nights) to give free legal counsel to all persons who attended church and might desire such. In this position he became intimately acquainted with the confidential affairs of almost all of the active membership of the Church, and also of hundreds of more casual members.

Dec PC?

FF-2-135B

Bough
E.C. 9/2

Laura Johnson

Profession: social worker. First joined P.T. 2/70.
T.O.S. he joined a few months prior. knew him till he left
Kearneydown in May or June of 1977. I stayed at his
home from Feb to June 1970. During that time
I constantly heard him involved in church legal business.

I was employed by the Mendocino County Welfare
Dept as a Social Worker in August of 1970 and
worked there until March 1971. During most of that
time T.O.S. was employed as Assistant District
Attorney by the Mendocino County District Attorney. He
was the attorney that advised the Welfare Dept.
During those times I would often ask his
advice on how to assist Temple members in
resolving problems that they had with Welfare
Departments, including Mendocino County.

In May of 1970 he advised me on obtaining a divorce in
S.F. County. I would regularly counsel people
at church on their welfare problems and T.O.S. would
regularly counsel with me giving legal advice
to Welfare Recipients in LA. Co, S.F. Co and
Mendocino Co.

He also advised me on many occasions to select
members of church volunteers to come to various
court proceedings in sympathy with the causes of
church members. On such occasions he would
tell me the background of such cases, how to act
and what to say.

FF-2-136A

Laura T. Jones

When T.O.S. was in Guyana in the spring of 1972, I recall that he gave legal advice to many members there and also to church officials about the conduct of their affairs both in U.S.A. and Guyana, including buying a house in Georgetown, investing funds in Guyana including the purchase of Govt Bonds.

During my job in care in Runda County P.T. owned ~~33~~ ^{several} ^{care} rest homes which were county licensed. Several other care homes were owned and operated by members & licensed by Runda County. ~~There~~ ~~the care homes~~ The licensing agency was the welfare dept. One of my duties for the church was to counsel and advise on welfare matters, including care home licensing matters. During the time we worked together in Runda County, at least on a weekly basis or more frequently, T.O.S. advised church officials and ^{care home} operators concerning all legal aspects of the operation of care homes and obtaining and keeping residents or patients. ~~for~~

4

FF-2-136B

Rough
9/12 EC.

Mike Prokes

I first visited C.T. in Nov 1972. At that time I was employed by KXTV, Sacramento as a News Bureau Chief in Stockton, C.A. I had come to C.T. to do a news story. One of the first persons I met there was Timothy O. Stoen, who introduced himself to me as the ^{Club} attorney ^{and "Jim" Attorney} for ~~George Leake~~ and as Assistant ~~Deputy~~ D.A. for Mendocino, Co.

I was so impressed with the humanitarian service work of the Club that I decided to join full time. I became a member of the Club staff responsible for radio broadcasts & publications. From that time until Feb. of 1973, ^{as per organizational proceedings} all of my working materials were reviewed and given legal approval by T.O.S. before publication or distribution.

In 1972 the Club began to publish a newspaper called "Peoples Forum". T.O.S. ~~element~~ as the Club attorney ~~also~~ reviewed all material for legal clearance before publication.

I would also seek and obtain legal advice from him with respect to information concerning the Club structure and organization which I would then give out to public officials and the media.

He would also, often, give me legal advice as to the legal effect of public statements I

_____ would make on behalf of the Church. ~~D~~

_____ PD During the years 1973, 1974, 1975, 1976 I was
_____ in very close contact with T.O.S. and sought his
_____ advice almost daily with respect to Church business. I
_____ would call him at his office, his home, and also
_____ see him regularly at Church. He also gave advice
_____ concerning the organization of church members to attend
_____ court hearings in support of certain causes, (and would
_____ use the facilities of his office to obtain information
_____ about certain persons, such as drivers license
_____ information, upon request.)

I was frequently present when he gave Rev.
Jones advice about all matters of church legal
affairs including publications, media releases,
corporate and denominational structure, faith
healing ^{tax exemption} and other topics. As the church attorney,
he was responsible for all ~~denominational~~ ^{legal} relations and
dealing with the denomination to which P.T. is
affiliated, The Disciples of Christ.

Virtually everything I did had some legal aspect
which, as church attorney, he instructed me to
check out with him, and I did so.

Y

FF-2-137B

*rough
9/2 given*

Joyce Parks

I am by occupation a Registered Nurse and Nurse Practitioner. I have been a member of P.T. since 1949. I have known T.D.S. since 19 when he first joined P.T. Very soon after he joined he became the attorney for the church. He was the only person with legal knowledge in the congregation. He continued to practice as the principal attorney for the church till sometime in 1977 when he left.

During those years the church carried on a variety of para-medical programs. Since there were many legal implications to this activity, we always sought and received legal advice from T.D.S. with respect to these activities. He drew, at our request, a variety of authorizations, releases and other legal documents to facilitate this program.

T.D.S. would also handle the legal affairs of many individual members of the church. Frequently these affairs were in connection with established church programs. For example, over the years the church was very concerned with the care and protection of minority and disadvantaged children. Many members volunteered to raise such children. T.D.S. consistently gave legal advice concerning the custody of such children, and recommended the involved adults in Adoption and Guardianship proceedings. In my case he represented me & my husband in court for the adoption of my son ^{Jay} Warren Parks.

FF-2-138A

10, as I recall, the last part of 1974 or early 1975. The child help services were consistently referred to by T.O.S. and often as "church programs" and the church had a very good reputation in N.Cal. for the care of children.

In summer of 1973 I was at a church service in L.A. when there was a near riot in front of the Church. As a result certain church members were detained by the police and two arrested. I was with T.O.S. when he went to the Police Station - in L.A. as attorney for the Church, Rev. Jones, and certain members who proceeded to represent those persons with respect to that incident.

FF-2-138B

Rough
done 9/2
HS

8 Violatt Esther Dillard ... nurse's aide

PT 1970 - Knew TOS since that time.

He introduced himself in church services on many occasions as the ~~church's~~ ^{TOS} ~~PT~~ atty for PT.

In 1971 I spoke with him after a church service in RNV about my daughter Claudia Norris who was then in ~~Youth~~ Youth Guidance Center in S.F. TOS gave me legal advice about how to proceed so as to best protect my daughter's interest. He dictated a letter for me to send to the Welfare Dept in San Jose about her case. I talked with him subsequently on more than one occasion about this matter and ~~discussed~~ ~~the~~ ~~best~~ alternative courses of action take.

In 1974 I had a job related accident. I went to TOS and discussed with him the details of the case and TOS gave me legal advice as to how to proceed to see that I received my proper benefits. During the next few years I discussed the case with him ~~on many~~ periodically and he advised me on each occasion as to what legal steps I should take. The last time I recall discussing the case with TOS was in the middle of 1976, when I gave him ^{copies of all the} ~~all the~~ papers I had relating to the matter dated from 1974 on. TOS said he would review the papers and discuss my case with

FF-2-199A

~~the~~ the attorney from my union (Local 250).

Millie Cunningham retired domestic

PT 1971 - I knew TOS ~~from~~ since that time.

I was referred to TOS as an atty for PT.

In 1972 I was ^{injured in} a car accident. I

went to TOS's office in Okiah and spoke with him about the accident.

We discussed the merits of the case and he agreed to handle the ~~matter~~ ^{case} for me.

At that time he had me sign some papers. ~~He told me that, I saw~~

I saw him several times after that about the case. One time he told me

that he had written a letter on my behalf. Sometime in 1973 TOS ~~told~~

advised me not to take the first settlement offer, but later in 1973 TOS advised me to take another settlement offer, which I did.

P. 11/12
9/12

Beatrice Jackson - retired person.
PT. around 1971. - Knew TOS from that time.
~~He was introduced to me as the atty for PT.~~
I was referred to him and he introduced
himself to me as the atty for PT.
About 1973. after a church service in Los
Angeles Calif, I met with him about
a property I owned in Abilene, Texas.
~~He asked~~ I asked him ~~about~~ for his legal
opinion regarding the sale of that property
and he ~~gave advised me~~ gave me
legal advice regarding how to handle the
sale.

P. 11/12
9/12

Diane Lundquist ~~shild~~ pre-school teacher
PT about 1969. Met TOS from about that time.
He represented himself in church services as the
atty for PT, beginning not long after I joined
the church.

Around 1974 my son Dov Mario Lundquist
was having problems in school. He was attending
Calpella School and I was dissatisfied with
the conduct of his teachers, ~~I contacted TOS~~
which I felt at the time was physically
abusive of my child. I contacted TOS
for his legal advice on ~~how to~~ ^{what to}
do about the situation and he asked me
to come to his office in Ukiah. We discussed

FF-2-1398

the matter there and he advised me to
call the teacher in question and instructed
me as to what ~~was~~ ~~I could say to~~
~~I could say~~ I should say to her, and that
what would be within my legal rights.
I made the call in his presence, following
his advice. (I subsequently learned that, at the
time, TOS represented the West Unified School District which
included Calipatria School.)

~~Maurice Hines aka Parnell Hardy - getting~~
~~maintenance person.~~
~~PT. around 1971. knew TOS since abt that time.~~
~~He was introduced to me as atty for PT.~~

I

9/10
[Joicy Clark] - retired domestic.

PT around 1969. I knew TOS from that time.

I was ^{introduced} ~~referred~~ to TOS as the church atty.

Around 1973 I asked TOS's advice about an insurance policy I was paying premiums on. He read the policy and gave me legal advice about how to get the most benefits.

In 1976 I had an accident on a bus.

In the Fall of 1976 I consulted TOS about whether or not I should accept a settlement offer. He asked me about the accident and we discussed the case. He looked over the offer and gave his legal opinion that I should accept the offer, ~~based~~ ^{based} on ~~his~~ ^{our} discussion of the case.

FF-2-140A

Rough
of
PT. 9/2

BARBARA CORDELL - profession: child care.
PT. member since 1968. I knew TOS since
he joined the church around 1969. ~~and~~
~~soon thereafter~~ He moved to Redwood Valley
and ~~soon thereafter~~ he ~~later~~ represented himself
as atty for the church.

In June 1974 I ~~can~~ spoke with him
about obtaining guardianship ~~for~~ over
Tameel Lawrence. ~~He advised me~~ He
discussed the procedure with me and
gave me legal advice. He directed
Gene Cuyam, a legal secretary who was
a member of the church, to draw up
guardianship papers on my behalf.
Although I represented myself in the
court hearing, he met me at the
courthouse ^{in S.F.} and advised me ~~on~~ ^{on} how
what to say in the court hearing. He
was with me at the hearing.

I was on the Government Board of PT since
May of 1973. Tim Stoen was also on that
Board which met weekly. At each meeting
TOS would be called ~~up~~ ^{upon} to give and
^{would} give legal advice regarding church affairs,
including the purchase + sale of
real property, corporate ~~affairs~~ ^{matters} and
public relations and other matters.
If a legal opinion was asked for, Tim Stoen would

FF-2-14003

be consulted.

Rough 9/10
#10

FRANKIE GRIGSBY - retired cook.

PT - around 1969. - I knew TOS from that time
TOS had been introduced to myself + others as
atty. for PT.

Around 1974 I had an accident on my
job at Trinity School in Ukiah. I asked
TOS for his advice on what I should do.
He talked with me ^{on more than one occasion} about the facts surrounding
the accident and gave me legal advice about
how to get some money to compensate
(a Mr. ^{Mr. Luther}) He finally referred me to another lawyer
who took the case and it was settled. TOS
also told me that he had talked about my
case with Mr. Luther and TOS advised me
to accept the settlement that was offered.

SANDRA JONES laboratory assistant
PT since 1956. I ^{have} known TOS since about 1969.
Soon after his joining the church he announced
(in a church service in Redwood Valley) that
he was acting as atty for PT and anyone who
had a legal problem could discuss it with
him after service. He made the same
announcement numerous times in S.F., Red-
wood Valley + LA.

FF-2-141

Rough 9/2

Joseph Lafayette Wilson. Construction
PT 1971. I knew TOS from 1971.

He was introduced to me as atty for church.

In 1971 I discussed with TOS the procedure for getting my criminal record in New Jersey ~~clear~~ expunged. We discussed the facts of my case, and TOS gave me legal advice on how to proceed, ~~He directed~~ and told me he would work on getting the matter straightened out.

About 1975 ~~there~~ there was a warrant out for me on traffic violations in L.A. County. I asked Tim Stoen for his legal advice and he ~~advised~~ ^{legal} advised me to turn myself in and gave me ^{legal} advice as to what to say and how to conduct myself in court, which advice I followed.

In 1975 I was in Santa Rosa, Ca when a friend and I were mobbed by a group of persons. I was to appear as a witness in a criminal trial arising out of that incident. The church was very concerned about the incident, as it had racial implications and occurred during a trip on a church owned + operated bus. The church felt that this was an attack on P.T. as a multi-

FF-2-142A

racial organization and was very involved in the ~~preparation~~^{assisting} of the prosecution on the hope that ~~it~~ it might forestall future outbreaks of racial violence. TOS spent several hours discussing the case with me and preparing me to testify in the case.

In 1976 I had an altercation with the police in Ukiah, California. I went to TOS's office in Ukiah several times and asked his advice on what I should do. ~~He~~ I told him the facts of the case and he gave me legal advice on what I should do to ~~best protect my interest~~, so the matter would be handled to my legal advantage.

FF-2-142B

Carolyn Layton

I am by occupation a certificated secondary school teacher. I have been an active member of B.T. since 1968. Over the years I have had many secretarial and administrative positions in the church including a position on the Church Board of Directors. I have known T.O.S. since he joined the church in 1969 or 1970, till 1972 when he left.

Part of my responsibilities were the area of banking and investment of church funds. I frequently asked for and received advice from him concerning banking and the investment of church funds, the purchase of certificates of Deposit and the like, and the legal consequences of various investments.

Often bi-monthly the B.T. & S.F. congregations would go to L.A. on a fleet of busses for the weekend. T.O.S., as I, would generally travel on the same buss. (#7). T.O.S. went for the purpose ^{give legal} of counseling members of the LA congregation which he would regularly do during services. During these weekends we routinely would have organizational meetings 3 or 4 nights which T.O.S. would regularly attend and give legal advice and give various church projects.

Several times he represented the church in situations where we believed ex members had taken funds or other property from the church. His representative included employing and paying

FF-2-143A

private investigators. He also represented the church when, at several instances, we believed that we were liable by the press, including sending letters, telegrams and talking to various persons. When outside counsel was employed in these matters T.O.S. always was the representative of the church with such outside counsel. On occasions the Church adopted the tactic of filing a lawsuit on behalf of members, rather than the corporation itself, as in the case where T.O.S. and Mike Pokes sued colonist Rev. Lester Kussolving. All legal fees were paid by the Church. This was done on the basis of legal advice by T.O.S.

Although T.O.S. never received a salary or fee for his legal work, there was financial cooperation. He received monies for travel expenses for church activities, funds for house payments and ^{gas and} repairs, and to purchase automobiles. These various payments often amounted to \$400-500 per month. He also received free room and board with a church member, arranged by the Church, during all of 1936.

T.O.S. did make some financial contribution to the Church, but these were very modest because during the time he was a member he was always deeply in debt for school debts and other debts he had when he joined the church.

Handwritten signature/initials

() Linde Shaw Hanes aka Shaw Anos

By occupation I am a social worker. I have been a member of P.T. since 1966. I am now T.O.S. since 196 - when he became a member of P.T.

^{T.O.S.} He would give legal advice to members regarding personal legal matters. He gave me advice over the years about a variety of legal matters including child support, ^{and} ~~at~~ ^{with} the Welfare Dept with respect to ~~that~~ employment protest, and also with respect to the legal affairs of a number of members of the club who I was assisting in social work cases.

Later, in 1975, when most of us, including T.O.S. (who was then employed by the SFDA) moved to S.F. he accompanied me and several others to a grammar school in the SFUSD where he met with school officials introducing himself as Attorney for P.T. and S.F. ^{District} Attorney. We discussed problems of the children of certain members of P.T.. I also attended numerous other social affairs, public and private with T.O.S. in S.F. during 1975 & 1976 when he introduced himself as the attorney for P.T..

At one time in 1975 when we planned to start our own school in S.F. for children of members and others he gave us legal advice on how to establish a private school.

FF-2-144A

I was also present when T.O.S. gave legal
counsel to many B.T. members over the
years because we had declared a sort
of total consulting format where a secretary,
social worker and attorney would counsel together.

T.O.S. was very much involved in the program
→ In 1972 when the French Board first
concerned the idea of establishing an overseas mission
T.O.S. reviewed the laws of a number of nations
including Guyana and advised the Board concerning the legal and
political affairs of the nations reviewed.

After Guyana had been selected, he prepared
a variety of legal forms including powers of attorney,
consents, authorizations and releases which were
used in the administrative function of processing
persons to move to Guyana. He also assisted
in obtaining passports, including drawing affidavits
of birth and other documents. He counseled persons
concerning dealings with creditors, ^{sale of} distribution of assets,
tax and other matters germane to winding up their
affairs in USA. In particular, I had a ¹⁰ (date)
problem obtaining my passport and he gave me
legal advice and wrote up some affidavits that
were used given to the Passport Department which
assisted in my obtaining my passport.

In . . . he also arranged and headed an
adult adoption proceeding for me to assist in
the care of my children. ^{FF-2-144B}

Richard Tabor

By profession I am a college instructor in English. I have been a member of P.T. since 1970, and have known T.O.S. since that time, and until 1976.

During 1976 & 1977 P.T. published a periodical entitled the Peoples Forum. I had an editorial responsibility for the paper and wrote a considerable portion of the material. The printed materials went through an organizational prior to being cleared for printing. Among these was a legal check because, of course, we wanted to avoid litigation which is always a risk in printing a periodical. T.O.S. would routinely be given materials for legal clearance prior publication and he would return the materials with his initials on them indicating his personal legal approval of the suitability of the material for publication purposes.

In addition to the "Peoples Forum", ^{since 1970} the Church also sent out a monthly solicitation mailer, printed notices of meetings and other matters. T.O.S. routinely cleared all of these materials for legal problems prior to their distributions, in the same manner as described above for the newspaper materials.

P

FF-2-145

Rough 9/2 HT

T. Earnestine March - nurse's aide

PT - since 1969 / known TOS - since 1970

He was first introduced to me as atty for ch.

In late 1969 or early 1970 I sought his

advice on a divorce from Alfred Nare

He gave me some legal advice about divorce proceedings and division of community property.

Rough 9/2 HT

Diana McKnight - cook -

PT - 1973 - known TOS since that time

He was referred to me as the ch. atty.

In June of 1975 I sought ^{in Los Angeles} legal advice from TOS regarding obtaining

legal custody over my younger brother Kenneth

who was then in juvenile hall. He drew up

a legal paper for my mother to get custody

and spoke to the legal authorities on our behalf.

FF-2-146A

261-5-144

Rough 9/2 HT

W 5/10 April

① Stephen M. Addison - psychiatrist technician
PT since 1959 - TOS - since he first came
to the clinic in RNVI, around 1969 or 1970.
He quickly became involved in clinic affairs
and was introduced to myself & others as
att'y for PT.

② In late 1971 I talked to TOS about
getting a divorce. ^{He agreed to take the case and}
I appeared on my
behalf in the Superior Court of Mendocino
County in front of Judge Broadbent
in the matter.

Rough
9/2

① Thomas R. Fitch - welder
PT - Feb. 1973 - TOS since that time.

He introduced himself to me as att'y for PT.

② I had an ^{auto-} accident in Sept. 1974. I
saw TOS in S.F. and asked his legal
advice on what my liabilities were and
how to proceed. He advised me on
what to say and do, and assured me that
he would take care of the matter. He drew
up a statement for me to sign about the
accident which I did.

FF-2-146B

HO
Rough 10/2 9/2

s/p 1/2
TH

① I, [Evelyn Thomas], - clerk - typist -
PT - 1971 - known TOS some Mat time
Intro as Atty for PT.

② Around 1974 I came to TOS for legal
advice because I was about to lose my
job at Central Valley National Bank
in Oakland. He also asked his legal
question about my financial situation.
He advised me on these matters and
gave me advice regarding bankruptcy
proceedings.

③ Rough 10/2 Eliza Jones - retired person -
#9/2 PT - @ 1970 - TOS same time

② I had a car accident in 1975 in Redwood
Valley, Calif. I spoke with TOS about the
accident and he gave me legal advice
about my liability and how to proceed.

PT-2-147BA

2-147

Rough 9/2
HT

TH
5/8 1971

① Mary F. Canada, - retired person -
PT member since 1971 - knew TOS from that
time. He was introduced to me as atty for church.

② Around 1974 I saw TOS after a
service in Redwood Valley and asked his
advice about my deceased husband's person -
as I had not been getting the benefits TOS
advised that I had several thousands of
dollars owing to me, and gave me advice
on the matter. I spoke with him about
this matter subsequently and more than one
person.

VERNON DEAN GOSNEY - COOK

Rough 9/2 HT PT - 1972 - knew TOS from that time. ^{with} ^{with}
TOS was introduced to me as atty for church

#2 - In 1974, I spoke with TOS in Redwood
Valley about my status as a welfare
recipient + he gave me legal advice
concerning this matter.

In 1975 I asked TOS's advice about
A. Being John Muir Hospital in California for
medical malpractice. He discussed the
merits of the case with me and advised
me on how to proceed.

pg. 2 - 147B

14 of 1984

Rough
9/2/84

P1 Juanita Green retired housewife

PT since around 1970.

Known TOS since that time

He was first intro to me as Atty for PT

P2 Around 1974 one night in RWV - I sought
his advice on a property matter. I

the matter was related to a small sum

I had been offered a small sum
of money to give up my interest in ^{property my parents} ~~had left the City~~ ^{Seq. in} ~~Seq. in~~ ^{City}

I asked TOS what to do about it and

gave him my deeds and he said he would

check the matter out. I discussed the

matter with him several times ^{thereafter} and he said

he would take care of it, and see to it that

I was not taken advantage of. He subsequently

told me he had lost the deeds and I

P3

FF-2-148A

Aug 9/2

① Teresa Cordell - I am an agricultural worker
PT - since 1971 - known to S since that time
He was introduced to me as the church attorney

② In 1975 my mother who is not a member
was causing me problems, trying to prevent
me from attending church - I sought +
received advice from TOS on having a
member of the church become my guardian.
He gave me advice on guardianship +
how to proceed.

In 1976 I was taking care of a baby
and I asked him advice on adoption
which he gave. He drew a power of attorney,
making me attorney in fact for the child.

48-1-5-77

48-2-148B

Rough
9/2/75

Ron Talley

By profession I am a ^{periodically} ~~lawyer~~ ^{Sawyer}. I have been a member of P.T.A since 1969. I have known T.S. from then till 1971.

Over the years I ~~was~~ asked him for legal advice concerning several matters: an industrial ~~traffic~~ ^{accident} case in 1975; how to get information about any outstanding traffic warrants in 1972 (he told me to call the Court representing myself as a local attorney handling my case); concerning a traffic case in 1971.

FF-2-149

Boyer
et al

Beatrice A. Orsot

By profession I am a legal secretary. I have been a member of P.T. since 1970. I have known T.D.S. from that time till early in 1977.

I was employed as a legal secretary for the Internal Revenue Service until the Spring of 1976. At that time I retired on a disability and began to do volunteer work daily in the legal services office at Peoples Temple, on Long Blvd in S.F.

Also At that time T.D.S. was a Deputy District Attorney for the office of the S.F. District Attorney.

Our legal services office handled almost all of the church legal business, as well as the legal business of affiliated organizations, and in addition (manuscript basis) the legal affairs of many members. T.D.S. was on the staff and did legal work in the evenings at our office, as well as his office. We had a rotating system whereby he would give legal advice to members of the congregation 1 day per week. Each week we had a staff meeting, usually on Friday nights. During the summer, fall & winter of 1976 he regularly attended staff meetings where all church legal affairs were discussed, as well as the legal affairs of many members. Staff procedures, policies and case methods were discussed and implemented. Church corporate business was discussed. I took regular minutes of these meetings and followed up the work assignments.

FF-2-150A

to see that they were completed on schedule.

I particularly recall that at that time he was involved in church denominational and tax work. He also advised on members criminal matters, all of the legal considerations with respect to church publications, radio broadcasts and solicitation materials. He worked on auxiliary corporate organizations, read and approved minutes and other organizational materials.

P

FF-2-150B

Page 2-151

I, Paul Michael McLain being duly sworn, say:

By profession I am a construction worker. I have been a member of PT since 1973. I have known TOS since 1973 until 1977. He was first introduced to me as the attorney for PT. He gave many members of PT advice + help with their legal problems, including myself.

In Nov or Dec 1976 I was arrested on a burglary charge in San Francisco by the S.F.P.D. I subsequently discussed with Tim Stinson how my case should best be handled to my legal advantage.

Frequently, over the years, while in meetings at PT churches I have heard TOS speak and church attorney, giving legal advice + opinions concerning church affairs and the legal affairs of various members.

PP-2-151

Rough 9/2/74

[Russell DeAndrea Moten] - agronomist & optician 3/8/74

PT - 1971 - known to S. since that time

He was introduced to me as the Atty for PT

(2) About 1973 I spoke with TOS about the possibility of having a criminal record in Philadelphia expunged. He gave me legal advice on that matter.

In the fall of 1976 TOS was in Los Angeles and I spoke with him about a member of our church ^(his wife) regarding an upcoming appearance in court. It was going to be a court with him as a friend and TOS advised me on what to do and what his wife should do to see that things went well for him.

FF-2-15-21

FF-2-15-21

Rough
#1 9/2

WSP [unclear]
[Ray Anthony McKnight] - mechanic

PT - since 1975. Met on TOS since 1975

He was first introduced to me as Atty for PT

P. In June 1975 I spoke with TOS about my brother Kenneth McKnight who was in juvenile hall in Los Angeles. He advised us to get custody of Kenny and he told us what we should do, to get this done and we followed his advice.

Rough #2
#1

[Bonnie Jean Simon] - bank teller + housewife

PT since Sept 1975 - Knew TOS from that time. He was intro to me as Atty for church ^{several times}

P. In 1976 I talked to TOS about the divorce case for my brother-in-law Ray Simon. I spoke with him both at the SF church and at his office in Ukiah. He agreed to handle the case for us and gave us advice regarding custody of my brother-in-law's child. He ^{also} drew up the papers and arranged a court date for us.

11-2-1528

and several corporate offices and directorships

(Carol Stahl)

By profession I am certificated ^{elementary} ~~primary~~ school teacher. I have been a member of P.T. since 1968. T.O.S. joined ~~several months~~ after in 1969, and I knew him from that date until he left in 1972.

I have held a series of volunteer jobs in the Church over the years and currently am the Corporate President. Shortly after T.O.S. joined he became the attorney for the Church and really he was the main attorney down through the years. We did employ other counsel from time to time, and in 1972 Gene Chanicki did assist him and handle "free legal services" matters for members during mid 1972 through the end of 1973, ^{when Gene went to Europe} & 2 days from mid 1975 through 1976, but T.O.S. was always the one primarily responsible for Church business and corporate activities.

He was the principle person I would discuss Church business with if it had any sort of legal implication. Under his direction I kept a whole series of legal documents relating to Church and individuals business and personal affairs.

I was present on one occasion ^{in 1976} when Marie Katonis discussed her relationship with and fears concerning her father with T.O.S., and heard him give her legal advice about it.
FF-2-153A

I was present in² Los Angeles, meeting of
some of the key members members of P.T. in
Jan/F 1925 where T.O.S. gave R. Jones advice
concerning a proposed donation of real property
by Mabel & Wade Medlock to the Church.
T.O.S. advised on how to handle the
transaction "legally", what should be said
and not said, how it should be handled,
and so forth. He, himself participated in
obtaining the Medlock signatures on certain
deeds which I subsequently understood were
never used. He was again present in another
meeting with the Medlocks in the winter of 1926?
at which I also was present, in Los Angeles
when the gifts were discussed and again
advised how the transactions should be handled.

Y

FF-2-153B

Rough 9/2
HT.

① Doris Howard (retired)

PT - since 1971 - known TOS since that time -

② Round

In 1973 - I asked + received advice from TOS about my son John Haines. He was in jail at the time and TOS gave me legal advice on what to say in court + how to handle John's case, so that it would be to his best legal advantage. I spoke w/ TOS on several occasions about this matter.

③ TT3

FF-2-154

④ He also set up a number of bank accounts for R.T.

Eva Rugh

Retired real estate operator. Member of R.T.
Since 1953. Known to R.T. since 1968 or 1969.

I was the ~~financial~~ financial secretary for Peoples Temple from 1965 through 1976, and routinely handled and disbursed Temple funds. I routinely got ~~for~~ legal advice from T.O.S. on how to handle bank accounts, how to keep books of account and my other duties. ⑤ Once ~~from~~ T.O.S. bought a set of books and set up the church financial books for me which I then followed. He was familiar with all of the church financial affairs.

Over the years I gave him money for various purposes: travel, expenses, and so forth. These expenses often would run \$500-600 per month. He received cash. Often he could not account for his disbursements but would also account at times for money spent. ^{Insurance himself had} for receipts.

In 1976 we sold our real home in Mendocino county, and a lawsuit was later filed with respect to the transaction. T.O.S. assisted me in the handling and disposition of the lawsuit.

In 1976 he arranged for me to be a signatory to deposit the checks, at Bank of America, of many of the members who had gone to Guyana, and draw other legal financial documents. Over during 1975 or 1976. The check Jan 2 1976
FF-2-155A

(a check for \$2500 deposit on the purchase of
an engine. The transaction proceeded from d
and T.O.S. helped to get our money back through
bringing charges in the SFDA's office.
d

FF-2-155B

11
100
Edith Roller

Professor. Educator, Secretary. Member
Since 1970. Known TOS from that date.

T.O.S. gave legal advice in 1973 to
help her keep her job at North Coast
Opportunity, the EDA office in
Mendocino County. He advised her how to
proceed and she was able to keep the
job for some time.

Only 1974 he approached me and asked
me if I would be willing to make my
will leaving my assets to the Church. I agreed
to do so. When the will arrived it showed
T.O.S. as beneficiary. He explained that
he was to be a "stand in" or representative
for the church. I signed it, and it was
witnessed. I did, and still do believe, that
he was acting in a representative for the church,
and not for his personal interest

FF-2-156

Rough 9/2 HT

Ruth Ann Tupper child care worker.
PT since about 1969¹⁹⁷⁰. I have known TOS since
about that time. He was introduced to me as
atty for PT.

#2. My parents were separated when I was
about 12 years old. I ^{about that time} ~~year~~ ^{later} ~~later~~ my mother,
brothers + sisters became members of PT.
Periodically ^{my mother + I were concerned} ~~that my~~
^(Lawrence Tupper) father might attempt to obtain custody
over myself and my brothers + sisters. On
several occasions I consulted TOS regarding
what to say to my father + how to conduct
myself + TOS gave legal advice on these
matters. He also indicated to me that there
were other people in the church with a similar
problem and he had given them ^{legal} advice as
well. Around 1972 my father was threatening
to take my mother to court in order to
obtain custody over ~~her~~ us. I spoke with
TOS ^{on more than one occasion} on what to do to prevent this and
~~told him of my~~ he ~~told~~ gave me legal
advice on what to say in court to ~~best~~
protect my interest ~~and~~ and prevent him
gaining custody. He went over my testimony
with me several times. ~~in~~ At his direction
I wrote a statement which was submitted
to my father's lawyer, ^{Michael B} ~~Alan Davidson~~ of Oakland.
TOS also consulted with Alan Davidson, who

157A
N-11

7/19/44

~~was sure itly of~~ Tim had referred my
mother and I to ~~see~~ ^{in Redwood Valley} ~~the~~ ^{about} The
Chal. ~~Mr. Davidson~~ ^{came up to Redwood}
~~Holly an~~

EX-2-157BB

12
9
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
590
591
592
593
594
595
596
597
598
599
600
601
602
603
604
605
606
607
608
609
610
611
612
613
614
615
616
617
618
619
620
621
622
623
624
625
626
627
628
629
630
631
632
633
634
635
636
637
638
639
640
641
642
643
644
645
646
647
648
649
650
651
652
653
654
655
656
657
658
659
660
661
662
663
664
665
666
667
668
669
670
671
672
673
674
675
676
677
678
679
680
681
682
683
684
685
686
687
688
689
690
691
692
693
694
695
696
697
698
699
700
701
702
703
704
705
706
707
708
709
710
711
712
713
714
715
716
717
718
719
720
721
722
723
724
725
726
727
728
729
730
731
732
733
734
735
736
737
738
739
740
741
742
743
744
745
746
747
748
749
750
751
752
753
754
755
756
757
758
759
760
761
762
763
764
765
766
767
768
769
770
771
772
773
774
775
776
777
778
779
780
781
782
783
784
785
786
787
788
789
790
791
792
793
794
795
796
797
798
799
800
801
802
803
804
805
806
807
808
809
810
811
812
813
814
815
816
817
818
819
820
821
822
823
824
825
826
827
828
829
830
831
832
833
834
835
836
837
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872
873
874
875
876
877
878
879
880
881
882
883
884
885
886
887
888
889
890
891
892
893
894
895
896
897
898
899
900
901
902
903
904
905
906
907
908
909
910
911
912
913
914
915
916
917
918
919
920
921
922
923
924
925
926
927
928
929
930
931
932
933
934
935
936
937
938
939
940
941
942
943
944
945
946
947
948
949
950
951
952
953
954
955
956
957
958
959
960
961
962
963
964
965
966
967
968
969
970
971
972
973
974
975
976
977
978
979
980
981
982
983
984
985
986
987
988
989
990
991
992
993
994
995
996
997
998
999
1000

Demastheneas Kutulos

By profession I am a maintenance ^{supervisor} ~~worker~~.

I have been a member of P.T. since 1964? and have ^{been} ~~known~~ T.O.S. from 1964? ^{15?} when he joined the chd. till early in 1977.

Over the years T.O.S. gave me legal assistance in several matters. He prepared the legal papers for me to obtain Guardianship of Tommy Bickman in 1969 or 1970. He assisted and gave me advice on how to deal with the Mendocino County Planning Commission with respect to obtaining a permit for certain fuel tanks I had placed on my property in Mendocino County. He also helped me with certain trust and out-pieces.

I also discussed Church legal business with him from time to time. I went to his office at Mendocino County District Attorney from time to time for such discussions.

P

FF-2-158

Rough 9/2/79

Toni Buford

I am a graduate of Univ of Peace and U.C. Berkeley in Journalism. I have been a member of P.T. since 1942, and have known T.O.S. since that time. When he first introduced himself to me it was as Church Attorney and Assistant D.A. of Mendocino County. I last saw him in Georgetown, Arizona in May of 1942.

In 1942 T.O.S. approached me as the attorney for P.T. and asked me to do volunteer secretarial work for him. I did agree and he gave me six large paper cartons of legal files (I found another 10 boxes later) all relating to legal matters of the church and various members. I acted as his secretary for about 1 year, working on all types of legal matters for the church and members at his direction. These included church corporate matters and ~~permits~~ ^{permits and matters} acquisition of real property for the church, acceptance of donations of personal and real properties on behalf of the church, writing wills for members with dispositive provisions in favor of the church, letters and documents relating to the Disciples of Christ Denomination, many letters on behalf of the church.

After I ceased secretarial activity I served as a sort of liaison between T.O.S. & Rev James with respect to the legal

FF-2-159A

... affairs of the church. One of my jobs on a daily basis was to telephone him, give him a rundown of the legal affairs of the church, and get his opinions, evaluations and suggestions. This continued for 3 years from 1973 to 1977. During this period there was nothing in the P.T. program that T.O.S. was not consulted about and which did not receive his approval. * During those years, he was the principal attorney and legal advisor for the Church, and all of its related ~~aff~~ activities and organizations.

In Feb 1977 T.O.S. came to Guyana, S.A. to do legal work for the Church Project there. Among other ~~proposals~~ matters he handled the acquisition of real property in Georgetown. During that time Gene Chalki and Harold Troop came down from U.S.A. They found weather and a general legal conference was held. * Among other matters discussed by ~~for~~ was a concern ~~from~~ over the reach of "Moonie" conservative ~~or~~ ship cases. T.O.S. stated that he had had several discussions with Marie Katonis concerning her relations with her father, that he

* though Gene Chalki and others did legal work for the church.

thought she might be a princess, and
had suggested to her that she come down
to Guyana to avoid jurisdiction. He stated
that he knew Steve Katsaris well, that he had
a very hostile attitude toward R.T. due to
his daughter's involvement, and that he felt
S.K. would likely move in that direction.
^{when in Guyana}
~~He~~ He also reviewed the Guyana lease and
Incorporation papers, ~~was~~ negotiated for the
purchase of real properties and gave legal advice
on a variety of topics. He remained in Guyana
until _____ 1977, when he left the
Church.

FF-2-159C

KERNS

Tim Stoen by Penny Silver

1. Tim gave my son Phil legal advice on numerous occasions. He helped get him out of C.Y.A. in 1968 and then when Phil escaped from C.Y.A. a couple of years later, Tim knew where he was and kept in touch with him although, Phil was a fugitive. He even had Phil call him collect on several occasions--however, Tim didn't tell me where Phil was hidden at, though Tim knew. He didn't report Phil's whereabouts to the authorities.
2. When I had the "Penny Kerns Show" in Ukiah, California, I taped numerous people throughout town on a talk show basis, when Peoples Temple was under attack by the press. I did this legally and openly. One of the people that I interviewed was a member of the Sheriff's Department. When Sheriff Bartlomeau heard about it, he got angry and threatened me with arrest. Tim advised me to make a copy of the tape and to then return the tape to the T.V. station. (Tim was D.A. at this time). I took the tape to Edith Bogue and Harold Cordell and they put the contents of the tape on another tape and I returned the tape to the T.V. manager, who then fired me.

Also, when Tim was D.A. in Ukiah, he left his job to appear on my T.V. Show. He knew that I was a member of Peoples Temple. Sometimes I would call him at work and he told me to be careful because everyone there were "Facist bastards".

3. When I won an insurance case against the Los Angeles Herald Examiner due to an auto accident during working hours, I was awarded over \$10,000 from them and also from State Farm. Because of this accident I was forced to go on Welfare--and had thousands of dollars worth of medical bills. When I asked Tim Stoen if I had to notify the Welfare Department about this money, he told me no--that I didn't have to tell anyone about money awarded in an accident case. I also asked him if I had to tell the IRS and he said that I didn't have to pay tax on it either. I later was told by a Social Worker friend that I was supposed to have notified the Welfare department and I had committed a felony.
4. When I worked for a doctor in Los Angeles, I learned that this doctor was involved in Welfare Fraud and Insurance Fraud. I went to Tim about this and wanted to turn this doctor in. Tim told me to Xerox all his records, which I did. I Xeroxed every record that the doctor had--I was especially upset because he had filed a false claim on my behalf and was afraid that I would get into trouble since I worked for him. Anyway, Tim told me to not report him and had me turn in the records to him and I don't know what he did with them. He told me that we might need the doctor later for something.
5. In Los Angeles, David Wise wanted me to kill my children who had left the church. This conversation took place on a Sunday, and it greatly upset me. Later that night, I learned that Tim Stoen was in the church counselling office working on legal matters. I found David Wise crazy out of his mind on drugs and threatening suicide and I went to Tim and asked him to come and help me. He refused to come to help and came only upon my insistence. He said he had a lot of legal work to do.
6. When my son was in jail in Santa Rosa for car theft, Tim led me to believe that he paid for my son's attorney and even said that he would sell one of his expensive couches in order to help pay for Phil's defense. He also had me give the attorney who defended Phil his phone number so that he could talk to him. Also, when my son went AWOL from the Army, Tim talked with him and advised him legally. And, while my son was stationed at the L.A. missile base, I told Tim that Phil had showed me classified federal material that he had slipped off the base and that Phil had plans to climb the fence and get out if there was a major missile alert--Tim told me to tell Phil

FF-2-160 A

to be careful". I was very upset over Phil's taking this classified information off the base which showed pictures and instructions of how missiles are made. Also, my son took me up to the base one night in the middle of the night and showed me how the base was laid out. He told me how the guards were on drugs and played Russian Roulette for the fun of it. (Later 17 of these guards were busted on drugs.)

7. When Tim Stoen was Assistant D.A., I told him that the Red Wood Valley Baptist Preacher Dan Duree, with whom I had worked at the T.V. station said that Dean Devires in charge of the Ukiah Daily Journal had told him that Peoples Temple would bomb the San Francisco Herald Examiner-- he said that he was glad to have the information that maybe we could "use it later". He did nothing about this.

8. Tim Stoen was involved somehow in the situation of the court reporter who ~~blew her brains out~~ had his daughter blow her brains out but I don't remember the details of this.

9. Tim Stoen had me call ministers all over Ukiah and tape them on the telephone and inquire about their beliefs. He didn't tell me this was illegal and told me that I did a good job. I called almost every minister in town. I don't remember the details of this so it probably isn't a good example.

10. When Tim Stoen was Assistant D.A. he knew that I found Leo Wade having sex with the preacher Ross Case in my home. I wanted to report this to the police but Tim encouraged me not to. But, he had me go to the principle of the school where Ross Case taught because Tim said that the principle should know what kind of a person was teaching children and so I did this. Karen Layton was one of the people who went with me and I don't remember the other person. Tim told me to tell the principle "in detail" what I had seen Ross Case doing sexually with Leo Wade, and I did this. I later learned that this should have been handled legally or in some other way. I never understood why Tim would have me do something like this, when he was an attorney.

11. When Tim Stoen was D.A., I told him that John Biddulph, who was a narcotics offender carried an automatic weapon in the glove compartment of his pickup truck but Tim ignored me. Also, I told Tim that one night John Biddulph told me that two men had come to his mothers home and threatened to kill Jim Jones but and yet when I reported this to Tim, he did nothing about this either. I never understood this.

12. Tim Stoen made up the statements and had the parents sign the statements an all people spanked publically. This included the Mertle childrens spankings and all adult spankings. I even got spanked--and he approved of all of this.

13. Concerning John Biddulph. Shortly after I had told Tim about John carrying a gun, John defrauded the furniture store where he worked of all kinds of money and split the area. It seemed to me that if Tim had listened to me in the first place, being the D.A. that this could have been prevented.

14. When I told Tim Stoen that I knew of some drug pushers, and asked him what to do about them, he told me to warn them that the police were after them. This was the first year I came to Peoples Temple. Also, this same period of time, I had taken in a hitchhiker, who was AWOL from the Army (but I didn't know it)--I let him stay in my home for several days and then he went on. Later the C.I.A. came to ask about him and Tim Stoen told me lies to tell the C.I.A. about him. He wanted to help the young man get out of the service and he told me to tell the C.I.A. that the young man was homosexual and a child molester--I don't remember the rest that Tim had me tell the agent. Tim told me that C.I.A. agents were sick people and to not worry that I was doing the right thing as he was worried the young man would crack on his job (he was stationed in a missile in Alaska or someplace up north) and cause a nuclear war.

FF-2-160B

Rough 9/2

Rebecca May Berkman primary school teacher,
music aide.

PT since 1953. Known TOS since abt 1969 when
he joined the church. He was very quickly involved
in church affairs and he would often give ^{legal} advice
in public meetings on church matters. He was known
to me as the atty for PT.

R In 1974 I was working at Harinda
Convalescent Hospital in Ukiah + suffered a
job related injury. I spoke with TOS about
the matter and the possibility of bringing a
civil action. We discussed the merits of the
case and he gave me legal advice on the
case, ~~I went to his office~~ and he agreed to
pursue the matter on my behalf. I met
w/ him at his office in the Ukiah Courthouse
and he had me sign some papers ~~related~~
that had to do with the case.

I came to Guyana in Dec of 1974 and
have remained in Guyana since that time.
I last saw TOS in the Spring of 1977 in Jonestown.
~~At that time he~~ ^{At that time he} ~~was in Jonestown~~ ^{told me} ~~that he~~
~~was going to be in Georgetown to take care~~
of legal matters for PT. In public meetings
in Jonestown at that time, TOS gave legal
advice concerning the purchase of real
property in Guyana. During these meetings TOS
was often consulted about his legal opinions.

FF-2-161A

15
11/10
11/11
Pamela G. Brads Law Moton

By profession I am a practical nurse. I have been a member of P.T. since August of 1941. I have known T.O.S. from that time till 1944 when he left for Guyana. I lived in T.O.S. home / from (when) [Hendocoy County, 1st 1944] grace was present (with John - got date) for a period of about 8 months. During that time T.O.S. was the only attorney for the church. One room of his home was fixed up as a study and he spent almost every evening, when there were no church services, working on church legal affairs in this office. The office contained hundreds of ~~files~~ files.

When he was home the phone would ring constantly, with people calling him about church and personal legal business. This would often continue until the small hours of the morning.

When my sister, ^{which} and myself sold our house on 11th St, Hendocoy County, he helped us with the transaction. He also gave me legal advice about dealings with my parents. I contacted him because I was concerned that they might attempt to force me to leave the church. He advised me on how to avoid this. It was an special concern when several ^{consensus} ^{relationships} were handed down over young people in another church group. 10
FF-2-162

HT. Rough
9/2

JACK BACON - profession: chemical engineer.

PT - since April 1971 - TOS since that time.

He introduced himself to me

P2 In 1973 I went to ^{see} Tim Stoers in his ^{Asst DA} office in

UKiah and got legal advice on an employment
issue. He also referred me to another attorney
and wrote a referral to that person on my
behalf.

I arrived in Guyana in July of 1974 and have
been here since. I last saw TOS in Spring 1977,
in Guyana, in Jonestown. During that spring I
participated in decisions wherein he spoke
as our atty, giving legal advice in respect
to the acquisition of real property in Guyana,
and matters pertaining to the U.S. legal
affairs of Jonestown residents. In particular,
I discussed my ^{CahP} divorce proceeding
with him.

x

FF-2-163

2 a/c

1-10-12

Hoyer, Barbara

Prof: social worker, joined P.T. fall of '71,
knew T.O.S. from then. I was employed by the Mendocino Co.
welfare Dept in fall of 1972. ^{worked there till 4/76} AT that time
T.O.S. was Assistant District Attorney for Mendocino Co.,
and was charged with the specific ~~part~~ function of
advising and representing the welfare Dept.

but
{
}

For the last 1 1/2 years of my employment I was
the Medical Worker for Mendocino County Hospital.
Among others, I took all of the applications from
members of the Unification Church residing in their
facility at Boonville, Ca. "Ideal City Ranch". AT
T.O.S. request I provided him w/ copies of
all intake sheets for such persons.

^{about June of}
Later in 1976 I moved to San Francisco. Then
I worked as a volunteer voter fraud investigator
along w/ T.O.S. who was then employed by the
S.F. D.A. I was asked to help him, by the Church
because in order to lighten his work load so he
would have more time to do Church legal work.
During the time I worked for T.O.S. I went
to his office several times and saw him working
on Church matters and heard him discussing church
matters on the telephone.

2-16-74
fl

- ④ And my own. He did ~~waste the~~ handled the ^{my} adoption of my daughter Linda Sharon, advised me upon my real estate business and other legal matters.

Jack Lovell Beam

Prof. Auto Sakana. Member P.T. since 1949. Known T.O.S. since he joined P.T. in 1969. When T.O.S. joined there was no attorney that was a member. The church had no regular attorney. T.O.S. seemed very devoted and immediately assumed that role. When he joined he was employed by the Mendocino County Legal Service Foundation and was ^{very} concerned over the legal needs of the poor. The church had similar concerns and had assisted him to clear up ^{his} office in Ukiah.

The Church very rapidly grew in size. T.O.S. work and influence in the church grew as the church grew. He assumed full charge of all of the legal affairs of the Church and its members, including Rev. Jones. From 1970 through 1973 our church grew from a small congregation in R.V. Calif to a congregation of over 10,000 ^{owning} with churches in R.V., S.F. & L.A., and owning, in addition 4 churches, and a number of residences in Mendocino County, a large auxiliary project structure in Mendocino County, a apartment house in L.A. and a fleet of 11 diesel buses, which made annual and often semi annual tours around the entire USA. Periodical publications and regular ^{scheduled} radio programs were produced, solicitation mailers and other publications distributed. A full scale legal services program was developed and ^{instituted}

AS 91-2-165A

④ He instructed me and several of my children on how to testify in court, and had a number of church members go to court with us to give us moral support.

Elois Christine Young:

Prof: Licensed Vocational Nurse. Member P.T. 1956.

Knew T.O.S. since he joined in 1969.

In ^{about} 1970 I began to divorce my then husband James Cobb and retained T.O.S. for that purpose. Another attorney completed the divorce. During those years my son Jim Cobb was a student being supported in school by the Church. At times he caused difficulty for the church. Tim Stoen spoke to him about this several times. After Jim Cobb left ^{in 1972} carrying with him a considerable quantity of guns and ammunition and saying he (with friends) intended to form a rural guerrilla band, I with many others in the church consulted with T.O.S. with respect to our legal position, the position of the Church (lest it become involved), the position of Tom Kice from whom they took a rifle, and the position of Jim Cobb himself - hoping to prevent him and his friends from doing something foolish. T.O.S. spent hours with us advising and working out arrangements to help protect all concerned. A couple of years later, when Jim Cobb began ^{systematically} contacting people and making derogatory statements about the Church and its members I frequently consulted with T.O.S. on how best to handle the situation to protect the good name of the Church against Jim Cobb's attacks. (over)

From time to time I was harassed by my ex-husband James and I consulted with T.O.S. whenever guided

FF-2-166A

occurred. He also assisted me in a bankruptcy proceeding.
~~in 1971 or 1972.~~ He also gave me some advice on
a probate proceeding in which I was an heir,
and miscellaneous legal advice.

~~I last saw~~ ~~Ady~~ ~~T.D.S.~~ ^{on} August 1, 1976
when he performed the marriage ceremony at my
marriage with my present husband. We were rather
close friends, as well as coworkers in the Church and
as well as he being my attorney down through the
years. I last saw him in Church St. in about
Feb. of 1972 when he told the congregation he was
coming to Guyana.

④ During those meetings ^{F.P.S.} ~~he~~ frequently told me that
I should be careful in any dealings with my
son Jim, that Jim was an incorrigible
liar and that I should not believe anything
that he should say to me. He told me several
times that my son Jim was saying many
totally false and vicious things about the
church, Rev. Jones and several members. This is
the same Jim Cobb that he is now representing
in a lawsuit against Peoples Temple.

FF-2-166B

Page 15

Ronald DeVell James

Profession: Student

Member since 1972

Known Stoen since then, introduced as the Church attorney.

Consult: Summer of 1973 about incident where the 2nd & 3rd were mugged in Santa Rosa, CA and I was to appear as a witness in a criminal trial. The incident was of great concern to the Church because it had racial overtones and occurred while during a trip on a Church owned and operated Bus. The Church took this attack as a act of hostility against the Church as such and took much pains in assisting the prosecution of the case ~~to~~ in attempt to prevent further outbreaks of overt, violent racism. T.O.S. spent several hours preparing me to testify in the case.

α

FF-2-167

Page 3
a
b
Susan Jane Jarrow aka Mason
Profession: Licensed vocational nurse. Joined P.T.
in 1971. Known to S. since that date. Introduced
as the lawyer for the church.

Consulted about employment & job recommendations. 1972
About an inheritance rec'd from mother and step
father, 1975.

TOS routinely gave members legal advice on
matters in church, for several years, and being introduced
from the pulpit numerous times as the church
attorney.

Ollie Maria Smith (Acc' Wideman)

Profession: Housewife. Joined P.T. 1972, known
to S. from then to 1976.

Consulted re marriage: I was 16 years old
and wanted to get married. Got legal advice
from T.O.S. how & where to get married legally
out of Calif - instructions on how to proceed, etc.

PK-2-168

Rough
9/13

Marlene Drine Wheeler, primary school teacher
PT 1970. Knew TOS since ^{about} ~~around~~ Jan. 1969.

He introduced himself in public church services
as attorney for the church.

In 1971 I saw him after a church service in
Redwood Valley and asked his legal opinion regarding
my status as a welfare recipient. He dismissed
my situation and he advised me as to my
legal rights and what course of conduct I
should take.

P3

Rough
9/13
6/7

Lemuel Thomas Grubb II schoolteacher
PT Feb. 17, 1968 - Knew TOS since sometime in 1969.
I met him when he first began coming to the
church in 1969.

In 1971 ~~Timothy Stoen was handling the adoption~~
^{my wife} I met with Tim Stoen at his home in Redwood
Valley and discussed the adoption of Kevin, Kelly +
Clark Smith. He agreed to handle the case and
took our money from us for filing fees. He drew
up adoption papers which we signed at his
direction. He did not pursue the matter because
he lost the papers, so we again spoke with him
about the matter and he drew up a second set
of papers which ~~the~~ ^{my wife} signed. A second
filing fee was given to TOS. The adoption was

FF-2-169A

Rough
9/5

[Clara Johnson] certified teacher.

PT. 1972 Knew TOS since that time.

TOS introduced himself to me as the church atty.

PT. ~~At~~ Some time in 1976 I spoke with TOS about a settlement offer I'd received ^{on behalf of my daughter} ~~on behalf of~~ from a car accident ~~my daughter~~ Janice + Joann Johnson, from a car accident they had been involved in. ~~TOS advised me to accept the offer~~ TOS discussed the merits of the case with me and advised me to accept the offer, which I did.

Rough
9/5

[Marion Lee Ingram] ~~trust donor~~

PT 1969 Knew TOS since about that time.

He publicly represented himself in church services as attorney for PT.

I began employment with PG+E in Ukiah in 1970. ~~During~~ Periodically, over the next four years I received legal advice from TOS regarding my job, ~~and~~ ^{on many occasions} he advised me of my legal rights regarding the retention of my ~~present~~ job and advised me on how to proceed ^{in registering complaints with} the ACLU ^{+ other organizations} about discrimination I'd experienced at PG+E. On one occasion he dictated a letter that I signed, directed to the management of PG+E.

FF-2-170

Rough 9/3 44

Marshall Farria - retired warehouseman
PT - 1969 Feb 1970 - I knew TDS since that
time. He was intro to me as atty for PT.
PT In the fall of 1970 I ~~was~~ had an
accident and lost time on my job. The
owner of the boat where I had the accident
refused to pay me any compensation. I
talked with TDS about it and he told
~~me what I could do~~ he gave me legal
advice about what I could do to get
some money ^{from the man} and referred me to a
lawyer in SF named Terry Green.

#3.

44-2-118

Rough 9/3 TT

I [Christian Leo Rozynko]. I am electrician

PT- Feb. 1970 - knew TOS since ~~that time~~.

~~He was intro to me as atty I know~~

I knew TOS since ~~around~~ about 1969 and he was very instrumental in my joining the church. ~~He told me that he~~ He told me that he was acting as atty for PT in addition to his job as Asst D.A. for Mendocino County.

P2. My father, ~~Vitali Rozynko~~, was adverse to my participation in P.T. ~~In 1975~~ Over the years my father, ^{Vitali Rozynko} altho divorced from my mother for some time, was continuously hostile towards the church, my, my ^{sister} brother + my mother's participation it. Periodically I, ~~also~~ consulted TOS on how the situation should be dealt in the event he should attempt to use any legal device to restrict my participation in PT. I received advice from TOS on what might be done if such an attempt were made, or how to avoid or prevent it. More than once he indicated to me there were several young persons in the church who feared a similar problem + that he + Eugene Chaikin had done considerable research on the subject, and that they were in a position to deal with it.

I also received legal advice from TOS regarding financial problems ~~with~~ I was having.

FF-2-172

Rough 9/3 HT

I, Charles Touchette, sales engineer and construction superintendent.

PT- Dec. 1970. - known to S since that time.

He introduced himself to me as atty for the church at a committee meeting.

FF. In sept. 1973 an incident occurred, when Jim C. Mickey T + others left the church.

When they left, they took ~~from~~ ^{other} certain items that were not their property. Among ~~these~~ ^{other} items

~~was~~ were, a hunting rifle, the property of one Tom Kice, a member of the church, ~~and the~~ In addition they had vandalised Tom Kice's property by tearing the phone out of the wall, defacing the wall ~~and~~ and doing other damage.

Because I was very concerned about what they might do with the weapon, Tom Kice and I went to TOS's office in Ukiah. Tim St. advised on how to ~~deal with~~ ^{handle} the situation, so as to protect Tom, and ^{how to} make a formal complaint. On his advice + instructions I talked with one of the Sheriff's deputies ~~and~~ about the matter.

I moved to Guyana in July of 1974 with my family and have been in Guyana since that time. I last saw Tim Stoen in the Spring of 1977 in Jonestown, P.W.D., Guyana. He was ~~here~~ in Jonestown, approximately 2 months. Twice weekly there were organizational meetings ~~where~~ that

FF-2-173A

Tim Stoen participated in and gave ^{legal} advice on
purchases of businesses + real properties in
Guyana (suriname?).

FF-2-173B

Print 9/3/75

Maryann Scheid Casanova medical assistant.

PT- since about 1971. Known to S since that time.

He was referred to me as the church's atty.

RB. Around 1973 or 1974 I spoke with TOS regarding the custody of my child Sophia. He advised me on how to proceed. ~~He/He/He/He/He~~ Again, around 1974 I sought TOS's advice regarding my husband's failure to pay child support. He gave me ^{legal} advice on what to do and got copies of my husband's divorce decree. He talked with me on several occasions about this matter, and eventually the matter was taken to court. ^{Sometime in 1976,} On another occasion, I spoke with TOS regarding my welfare status and the payment of child support. ^{TOS} He dictated a letter to ~~you~~ me to send to my brother's attorney in Beverly Hills, CA., which I did send.

In 1973, I participated in a picket line around the S.F. Examiner Bldg on Union St in SF. TOS was present and gave advice concerning the conduct of the picket line. He also spoke to policemen and other city officials there and identified himself as atty for PT.

FF- 2-174

Paul H. 9/3

Helen Snell

Profession: Retired

Member since 1971.

Known T.O.S. since that date, stayed in his home

as an overnight guest on several occasions

consulted; he gave many generous legal advice.

Sought his legal advice about an auto accident case in 1975. He referred me to an attorney in S.F. to handle the case.

p

Paul H. 9/3

Frances B. Davis

Profession: Housewife

Member since 1972. Known

storen since then, introduced as church attorney.

My husband consulted T.O.S. about a pension fund problem in 1975.

p

Georgia Lacy

Profession: Housewife

Member since 1969. Known

T.O.S. since he joined. ~~Introduced~~

Paul H. 9/3

Consulted about: real property matter in 1972 & 1973.

Custodianship of children 1974. Domestic relation problems with

husband in 1975-1976. Advised on care home operation

in Mendocino Co. in 1972 or 1973.

p

FF-2-175A

Conf 9/3

Edith Estell Cordell

Profession: Retired. Member of P.T. since 1951.

Known T.O.S. since he joined in Redwood Valley.

Consulted about Guardianship of a child I had in my custody in 1974.

✓

Conf 9/3

Margaline Lyles

Prof: Housewife

Member since 1972

Consulted on obtaining ^{several times} husband's disability payments

in 1975

✓

Patricia Lee Brunnet

Member since 1972

Known T.O.S. since then 1971 referred to him;

P.T. for help by Earl Irvine, president of the District of Christ of N. Calif which is the Denominational Regional Organization. I met T.O.S. as the

attorney from P.T. explained to him my then boyfriend was in prison and I was anxious

to secure his release. After some several consultations T.O.S. wrote the Federal Probation Board on behalf of the Church offering to be responsible for my boyfriend if they would see fit to parole him.

Later in he assisted me by ~~doing~~ the

~~guardianship papers~~ (almost weekly)

I frequently attended church ^{business} meetings. Later 1973 and 1976 when he gave organizational business advice as the church attorney of FF-2175B

Post
9/3
H

Ex 12 Marie Duckett aka Marie Lawrence

Ref: none Made since 1972. Known T.O.S.

from that time, introduced as school attorney:
in 1972 about my union ~~negotiation~~ ^{potential} ~~potential~~ ^{conditions}

Consult: in 1973 about a case where my mother and I were welfare problem & he advised on how to handle it. In 1975, December, about a problem involving an automobile purchase.

Post
9/3

Johnnie Mae Yates profession: physical therapist.

PT 1970 - Known TOS from that time as the church's atty.

Consult In 1973 I was injured in a car accident, ~~talked with him~~ sought his legal advice about car accident and ~~he~~ after hearing the facts, referred me to a lawyer in Los Angeles. In 1974 I sought his advice regarding a surgery I had on my back, ~~but he~~ and the potential for a medical malpractice suit. He gave me legal advice on that matter.

PT-2-175C

10/1/74 9/1/74

Julia Birkley - retired cook.

PT: ^{Around} 1971. I knew TOS from that time.

He introduced himself to myself + others in church services as the attorney for PT.

In 1973 or 1974 I contacted TOS ~~at~~ about an insurance policy. I sought his legal advice regarding the policy and he gave me ^{legal} advice about it, ~~and~~ agreed to pursue the matter for me, + took the necessary information from me.

Larry Schacht

10/1/74 9/1/74

Professor: M.D. Joined P.T. 1971, knew TOS. Since then...

When I first came to Turtle I had been in a auto accident, I was a passenger. I had started a suit, claim for damages. Consulted TOS about the suit.

I was in a number of business meetings over the ensuing years where TOS talked as a lawyer, giving legal advice. I heard him discuss business transactions, the conduct of litigation, legal regulations, opinions on various laws and tax regulations.

FF-2-176*

Loose De Pina:

Prof. retired Homewife, First June 1972,
first met T.O.S. soon after, introduced as the
Chuck Hanger. First saw him in 1976. Stayed
at his home & he helped to take care of
the baby.

Consulted him in 1973 with respect to
a domestic relation problem.

James
Jeffrey Carey

Prof: look Member since ^{Aug} 1969. - knew T.O.S. from
that date till Spring '77 at first New & began
Consult: gave legal advice concerning a
criminal matter in I believe 1972. (A) (B)
While T.O.S. was in Toronto in 1972
he was studying Common Law so he could
pass the Bar & began in order to represent
B.T. and its members in business used to
help him with his studying in the evenings.
We had several business meetings which both
he and I attended where he gave legal
advice on various matters. He also did legal
work on a real estate transaction, ^{2 sales fraud case ones} and on
several tax matters. He also discussed the
matter of the custody of John Stoen, and
advised how he would assist keeping the
child in Germany.

(C) Shortage in a lumber purchase where he

Apr 2 - 1968

advised me on how to act and what to say to the Seller, one Mr. Baccus, and was present at a meeting with him where he presented himself as the attorney for P.T. and negotiated with the man.

(A) Also, in 1972, I was concerned with my father's feeling about my participation in church (I was then 19 years old) and discussed the matter with T.O.S. He telephoned my father who was then a resident of Mangilao, Guam, and satisfied him as to the check and arranged, for a check ^{his consent} ~~maker~~ ^{made by} Jack Bean, to be my Guardian to establish ^{my} residence for college tuition purposes.

(B) ~~Before~~ ^{until} I came to Hagana, in 1974, I worked in the church publications department evenings and weekends. I would run errands for him and routinely took all publications to him for "legal clearance", he would normally review them in my presence, correct and delete in his own hand, and initial "T.O.S." and return them to me to take back. I would also routinely take legal documents for his review and ~~take~~ ^{would take} several piles of such documents to him each week which he would, at times, review in my presence.

P

FF-2 ~~the~~
176C

John Harris
H 9/3

I ~~John Harris~~ ~~John Harris~~ profession: forensic pathologist

Pt. Oct 1969 I have known TOS since about that time, when he joined the church.

He was intro to me as the lawyer who was handling church business.

In Spring of 1970 I asked TOS for his legal advice regarding alimony and child support payments. TOS gave his legal opinion on the matter and agreed to help me ^{resolve the} ~~on the matter~~ matter to my best legal advantage.

Around 1971 I sought ~~his~~ legal advice about a violation of probation ^{for} ~~and~~ child support & alimony. Again he advised me as to what my legal rights were and what course of action should be pursued.

I also consulted him for legal advice regarding traffic violations. TOS agreed to handle the matter and speak to the judge on behalf. He dictated a letter for me to the judge in the Circuit Court House. This was around 1972.

Again in 1972 TOS gave me legal advice regarding alleged probation violations. My probation was revoked &

~~In 1973 TOS handled~~

went to jail. TOS ~~then~~ gave me legal advice while I was in jail and arranged for bail. He handled payment of restitution ^{when} ~~and~~ released me from probation.

In 1973 P.T. was interested in buying a printing

FF-2-177A

When I worked at Infocom I printed check stubs, which TOS reviewed. ~~He~~ I added comments ~~to~~ prior to printing for legality.

firm in S.F. called Infocom. ~~was~~ I was working there at that time. TOS was negotiating on behalf P.T. for the purchase of the firm. I participated ~~in~~ him in meetings to discuss the purchase with the current owners Mr + Mrs John Price. These meetings took place at 625 Third St.

~~the~~ During 1973 P.T. had a radio broadcast on KFAK. The station was planning on changing ~~over~~ ~~their~~ ~~format~~ Their format and concealing our program. TOS, Harold Cockell + ~~that~~ I spoke ^(Judy Stenderant) to Station Manager ~~Harold Stenderant~~. TOS was ~~not~~ acting as atty for ~~the~~ P.T. during that meeting. ~~In 1973 TOS~~

In 1974 TOS gave me legal advice regarding a personal injury suit I was going to file against Pennyp. TOS discussed with me the merits of the case + referred me to Jack Harrison of Ukiah. TOS later reviewed the settlement offer and legally advised that I accept it, which I did.

In late 1974 I was involved in a car accident. ~~TOS I discussed~~ I received legal advice from TOS on this matter. He made a phone call on my behalf + recommended me to Dick Hodge.

Around 1975 I received legal advice from TOS regarding obtaining a passport. I was concerned because of my police record.

FF-2-177B

Job 4/3

John Harris

During 1975

~~In 1975~~ I received legal advice from
on several occasions
TDS regarding ~~myself~~ a welfare, ~~and~~
Social security & SSI.

In 1976 I again received legal advice from
TDS regarding child support + alimony payments.
TDS discussed my case with me and referred me
to another lawyer.

FF-2-177C

Rose T. Shelton was a retired instructor of cosmetology.
P.T. 1969. I knew TOS since he joined the church
in 1969. He was introduced to me as an atty representing
the church.

I rode on the same bus as TOS on his
regular trips to and from Los Angeles, over
a period of time covering approximately 1974 - 1976.

On each trip TOS would work on legal
papers and discuss legal affairs of the church with
other members. He asked me on more than
one occasion to ~~give~~ keep the people on the
bus quiet so he could do his legal work.

I prepared meals for him on the bus and he
commented to me ^{many times} on ~~how~~ ~~much~~ ~~time~~ ~~he~~ ~~had~~ ~~to~~ ~~do~~ ~~on~~ ~~the~~ ~~bus~~ ~~and~~ ~~how~~
much church legal work he had to do, in addition
to his work for the D.A.

T. Berger Lee Dean

P.T. Retired Housewife. Joined P.T. in 1972. knew
TOS since ~~1969~~ then. He was introduced as the church
Attorney.

He would see people after church services. Over the
years I saw him about a criminal charge against my
grandson Michael's disability case.

Carks Tetterg, Oct 1972, 1972. He was insured that this of
no legal problems could see TOS

and Johnson, 1972, 1972. I was told he was the
head of the Temple.
1972/1973, TOS about some property I owned

Source Jackson, 1973, 1973. I knew that TOS was
a lawyer of the Temple. In order to solicit for donations
to churches, he had a Solicitor General which TOS
had signed as legal counsel for PT.

Gary Lee Tyler, March 73, 1973. He told my wife,
Lorain Mae Skaggs, in my presence that he was head of
the church. He signed off of A form for me to take
to have an adult other than my parent
in 1971, about was 17. TOS signed off of A form for me
when I moved from LA to SF.

Robert Wendell Bigg, May 1963, moved that X, I met TOS.
was refused to TOS by several members in the church.
As a conscientious objector, I was reg'd to do alternate
service. I was worried about my status since my employer did not
require my pay. He required hours of work. I sought
TOS's advice about my legal status with the circumstances.

Hazel Newell

In 1974, he gave me legal advice concerning a loan on my home.
In 1976, he also gave me legal advice. The following was not
necessary for me to get my husband's consent for my future
children concerning my children.
FF2-179A

1. April

~~1975~~ He advised me to about seeing
~~social security~~

check with
my 46
1/3

In 1969, 1970, He was introduced
to me at the church aty.

In 1971, he advised me regarding the
my home for the aged in Santa Rosa, Sonoma Valley
near S. adjacent of Santa Rosa.

In 1975, he advised me regarding the
trust of my son, Mark Wagner.

my 46
1/3

Vicky Dover Marshall, 1974, 1974. TOS advised
me on guardianship proceedings before
a member of PT and during I had some part of a
member of the Temple, going

In 1976, he was the attorney for my
grandfather, Nicky, who was also a church
member, legal advice concerning a car accident.

my 46
1/3

In 1971, 1971, I would be seen
with him and advised by TOS. He was introduced to me
at the church aty for PT.

In the fall of 1971 generally 1972, I consulted
TOS about the state property I had inherited.
Again in 1973 or 1974, he gave me legal advice on
a concerning a car accident I was involved in.

Hyacinth Thrush

FF-2-179B

4757 5-77

1972
1973 Anne J. Rozek, R.N. 1970. knew TOS before going PT
to was a friend of my husband. C. 1966. while still a
to headed legal services. She is bigger than I. PT around the
same time. Soon after that I became aware of the fact that he was
acting as a legal officer. Soon after he joined PT, he became very
active in legal affairs. He almost never missed a day
for advice in legal matters.

Around 1971 or 1972, my husband wanted to reduce child support
I asked TOS to advise on the matter & he gave me advice on how to
but hardly the child support.

Again in 1973, TOS advised me in a legal matter.
In 1973, my mother-in-law & I went to TOS for advice on
my mother's estate & the disposition of her will. He discussed
the matter with me at that time.

Around 1974 or 1975, my job at Nat. L.H. Council was in SF
was properly called. My husband had advised me for TOS on how to
run my job. He told me how to proceed in dealing with
administration of his father's preliminary steps of the recall suit of
the

1975
1976 Rita Jeannette Tupper, Attorney. 1971, 1971. He was assured
in one of the PT info that she should go to him for advice.
Between 1971 & 1973

1972
1973 He advised me in my divorce which began the
divorce was finalized I had temporary custody of my
son Larry Howard Tupper. My husband took Larry
me somewhere and did not return him. Tim advised me to
go to S. S. P. & Elm Street to my husband's parents
house in Redwood, Calif and forcibly take the child.
FF-2-1982

As in conjunction to my son my husband
sent me a check for the amount of
\$100.00 which he had ordered. I felt obliged
to return the same using the amount of
\$100.00 which he had ordered. But TOS advised me to keep
the \$100.00. This forbade me from giving back the
unpaid amount. I was advised by a cousin
of action against me for

Luella Cordell, secretary-stenographer, 1953, 1970
In May, 1972 TOS advised Annelle Cordell
in the fact on the matter of receiving parental
consent for Denise Bacon to visit
to leave the country.

Pierce Brian Bryant, 1975, I was told TOS was
threat for PT.
Advised me in regard to seeing unemployment
benefits.

Eddie Washington, July 1972, Oct 1972 I was
told that anybody who had any legal matter should see
TOS. He advised me to see legal advice on the
matter of one of my tenants criminal charges
pending against one of my tenants.

In 1974 he advised me on the matter of the
property guidelines on a piece of property I
owned.

FF-2-17D

My husband had filed a lawsuit in court

6
Zipporah Edwards, ^{Michelle} inspector, 1957-1971, TOS introduced
himself as the attorney for PT.
In 1973, he acted as my attorney in the transfer of deeds
property in R.V. Co.

Debbie Wilton, ^{Michelle} 1970, 1973, TOS was introduced here
as the attorney for PT. I gave her legal advice concerning a
civil suit that was pending. I was involved in.

~~Robert Johnson, ^{retired} Longshoreman, 1968-1971. I was told that
TOS was attorney for the PT. I consulted him for legal advice
in 1972, he advised me concerning my legal rights in a
public demonstration.~~

FF-2-1795

Anna Buckley, student, summer, 1974, 1976,
introduced her to my father.
In 1974, TOS gave her legal advice concerning
guardianship of my daughter.

inf 36
9/2
Randy Ann Lewis, student, summer, 1969, 1972. He was
mentioned in PT meetings and never could get her for legal
advice.

In 1973, TOS advised me on the transport of my
daughter & I agreed. He corresponded with my husband's lawyer
on the matter.

my 36
8/3
Martha Ellen Klingman, lawyer, 1966.
Pauline Jackson, receptionist, Sept-Nov 1971, Dec 1971.
He introduced her to the lawyer for PT.

In 1974, he gave me legal advice concerning the
guardianship of Julie Runnels. He advised me not to
be too happy in it that I had known the child
& he mother 6 yrs. although he actually known her only
2 yrs.

In 1974, he also advised me concerning her to get her out
from the county before I was actually settled with her in the
home at Julie's guardianship.

my 36
11/14
Coley Francis, student, 1973, 1973. He publicly announced
to us that if my father had legal ^{rights} ^{over} her, he would take her.

In 1975, I wanted to move from LA to SF though I
wasn't at the time and TOS advised me to wait
my grand mother, in my presence, to be settled.
My grandmother, Alice Runnels, and I stayed at TOS'
house in RNV in 1975.

FF-2-179F

Thelma Jackson, judicial assistant, 1968, 1970
It was stated that he was meeting & also could be
consulted for legal advice.
In 1974, my husband, Dr. & I, consulted
JOS for legal advice concerning a case and
Dr. was being for ^{some} personal reasons to his legs.

Mark Anthony Burt, carpenter. He met my husband
1969, 1975. He was probably in meeting that time
to come and to come to the back of the church
if you wanted to see him.
In 1975, he advised me on how to handle
an accident - insurance claim accident - was advised

In 1976, on another occasion, he advised me how to take
care of the kids which were had been put
into the car. He would take care of it but
apparently he did not as he was continued to get
the same advice in the next repeatedly.

John Edwards, cook, 1970, 1976. From 1976
from 1976, for Dr. so usual, sometimes more than
one. He advised me on how to handle
In 1970, he advised me on how to handle

FF-2-1796

John Van de Kamp
Los Angeles County District Attorney

FF-2-180

Affidavit of Beatrice A. Ursot: *aka Beatrice Horton*

of the Discipline of Christ (The Church, Peoples Temple)

By profession I am a legal secretary. I have been a member of Peoples Temple ^{aka (Tim Stoen)} since 1970. I have known Tim Stoen since that time till early in 1977.

I was employed as a legal secretary for the Internal Revenue Service until the spring of 1976. At that time I retired on a disability and began to do volunteer work daily in the legal services office at Peoples Temple on Geary Blvd. in San Francisco. Also at that time Tim Stoen was a Deputy District Attorney in the office of the San Francisco District Attorney.

Our legal services office handled almost all of the church legal business, as well as the legal business of affiliated organizations, of many members of the church and indigent members of the community, all on a pro bono basis. Tim Stoen was a member of the staff and did legal work at our offices on evenings and weekends, ~~as well as on weekends~~. We had a rotating system whereby he would be available to give legal advice to members of the congregation, which he did once a week. Each week we had staff meetings, usually on ~~Thursday~~ Friday nights. Those who usually attended were Tim, ^{Stoen} Gene Chaikin, Harriet Tropp, myself, ^{aka} June Crym. During the summer, fall and winter Tim regularly attended those meetings, where all church legal affairs were discussed as well as the legal affairs of many members. Procedures, policies and ~~base~~ methods were discussed and implemented. All church corporate legal affairs were discussed in full. I took regular minutes at these meetings and followed up the work assignments to see that they were completed on schedule. I particularly recall that at that time Tim ^{Stoen} was involved in church denominational and tax work. He also advised ^{on} members on criminal matters, all of the legal considerations with respect to church publications, radio broadcasts and solicitation materials. He worked on auxiliary corporate organizations, read and approved minutes and other organizational materials.

*OK E.C. 9/15
Dwight H. 8-2-18*

Affidavit of Barbara Hoyer: (1 of 1)
of the Disciples of Christ ("The Church")

I am a social worker, I joined ~~the~~ Peoples Temple in 1971 and have known Tim ^{Tim} Stone since that time, For several months in San Francisco in ~~it~~ San Francisco we worked closely together. I was employed by the Mendocino County Welfare Department in the fall of 1972 and worked there till April of 1976. During most of that time Tim was the Assistant District Attorney for Mendocino County and was charged with the specific function of advising and representing the Welfare Department. We also advised various Church members on welfare problems and I would quite often confer with Tim about them and he would advise me on how best to help them.

Later, around June of 1976 I moved to San Francisco. There, till I found a job, I worked for Tim as a volunteer voter fraud investigator. He was then with the San Francisco District Attorneys Office. I was asked to help him by the church because he was so busy that he could not find sufficient time to do the church legal work and the idea was that I would free him up so he would have more time to do church legal work. During the time I worked with Tim I went to his office several times and saw him working on church matters and heard him discussing church matters on the telephone.

ok. E.C. 9/6

FF-2-182

AFFIDAVIT OF JOSEPH WILSON

~~XXXXXXXXXXXXXXXXXXXX~~

By profession I am a construction worker. I have been a member of Peoples Temple, since 1971. I have known Timothy Stoen since that time. He was introduced to me as the attorney for Peoples Temple. ^{of the Peoples Temple, Peoples Temple, D. Stoen (Tim Stoen) until 1977.}

In 1971 I discussed with Tim Stoen the procedure for getting my criminal record in New Jersey expunged. We discussed the facts of my case and he gave me legal advice on how to proceed, and told me he would work on getting the matter straightened out.

Around 1975 ~~XXXXXX~~ a warrant was issued for me on traffic violations in Los Angeles county. I asked Tim Stoen for legal advice, which he gave me, regarding what to say and how to conduct myself in court. Again in 1975 I was in Santa Rosa, California when a friend and I were mobbed by a group of persons. I was to appear as a witness in a criminal trial arising out of that incident. The church was very concerned about the incident, as it had racial implications and occurred during a trip on a church owned and operated bus. The church felt that this was an attack on Peoples Temple as a multi-racial organization and was very involved in assisting the prosecution. Tim Stoen spent ^{many} ~~several~~ hours with me, discussing the case and preparing me to testify.

In 1976 I had an altercation with the police in Ukiah, California. I went to Tim Stoen's office in Ukiah several times and asked his advice on what I should do, so that the matter would be handled to my legal advantage, which advice he gave me.

Frequently, over the years, while in church services or meetings, I at P.T. Churches, I have heard Tim Stoen speak as the church attorney giving legal advice and opinions concerning church affairs and the legal affairs of various members.

FF-2-183

KSCGK
OK 4/1

Rough 9/3

AFFIDAVIT OF MARION LEE INGRAM

~~By profession~~

I am a graduate of the State College of New York at *
I am currently working as a primary school administrator and art teacher.
I have been a member of Peoples Temple since 1969, and have known Tim Stoen
Stoen from that time until the early part of 1977. I first became aware
of his being the attorney for the church when I heard him say that he was
at a church meeting in Redwood Valley. He later introduced himself to
me as the attorney for Peoples Temple.

I began employment with Pacific Gas & Electric in Ukiah, California
in 1970. Periodically, over the following four years I received legal
advice from Tim Stoen regarding my job. He advised me of my legal rights
regarding the retention of my job and advised me on how to proceed
in registering complaints with the ACLU and other organizations about
discrimination I had experienced on the job. On one occasion he dictated a
letter that I signed, directed to the management of Pacific Gas and Electric.
Throughout the years I have heard Tim Stoen speak as the attorney for
Peoples Temple in giving legal advice and opinions on church affairs
in Peoples Temple church services and meetings. He gave legal advice
to numerous members of Peoples Temple as part of the ongoing church
programs.

1/2 1/4
6/4

2-184

Affidavit of Paul Mc Cann:

of the Disciples of Christ (Hicksville, "People's Temple")

I am a construction worker and I have been a member of Peoples Temple since 1973. I have known Tim ^{Stoen} ~~Stoen~~ since then. He was first introduced to me as the Attorney for Peoples Temple. He gave many members of Peoples Temple legal advice and help with their legal problems including myself.

In November of December of 1976 I was arrested on a burglary charge in San Francisco by the San Francisco Police Department. I was innocent. I subsequently discussed with Tim ^{Stoen} how the case could be handled to my best legal advantage. His advice was followed and the District Attorney dropped the charges after I had successfully completed a lie detector test showing that I had not committed the offense.

Frequently, over the years while in meetings at Peoples Temple I have heard Tim Stoen speak as church attorney and give legal advice and opinions concerning church affairs. I have also seen him giving legal advice to many, many persons after the conclusion of services. It was a ~~regular~~ regular part of the ~~part~~ ^{part} ~~part~~ ^{part} he ~~said~~ ^{said} in church.

1 of 1

*ok. EC. 7/85
OK for 9/85*

FF-2-185

Affidavit of Edith Roller:

I am now retired but have worked as an educator and as a secretary. I have been a member of Peoples Temple ^{of the Disciples of Christ (The Church of Jesus Christ of Latter-day Saints)} since 1970, and have known Tim Stoen since that date as a fellow church member, as an attorney, and as a friend.

In 1973 he gave me legal advice to help me keep my then job at North Coast Opportunities, the ^{Community Development} E.O.A. office in Mendocino County. During the summer of 1974 he approached me and asked if I would be willing to make my will leaving all of my assets to the church. I agreed to do so. When Tim brought the will it showed him as the beneficiary. He explained that he was to be a "stand in" for the church, or a representative of the church. I signed it and it was witnessed. I did, and still do believe, that he was acting ^{as} ~~in~~ a representative of the church and not for his personal interest.

1 of 1

FF-2-186

Affidavit of Loretta Cordell

originally a pedagogue organization (like the Temple)

I am a secretary-stenographer. I have been a member of Peoples Temple since 1953. I met Tim Stoen in 1970 shortly after he joined the organization. At that time he frequently referred to himself as the lawyer for the Temple.

In May, 1976, Tim advised Annette Jones and I in the matter of securing parental consent for Monique Bacon (Annette's granddaughter) to travel to Guyana with us.

*2k EC 5/15
OK*

FF-2-187

Affidavit of Mark Boutte

By profession, I am a carpenter, ~~in the mailing department~~. I joined the Temple ^{George} ~~Disciple of Christ~~ ^{3/76} in 1969 and ^{TC 10} met Tim Stoen in 1975. He said publicly in meetings that we could go to him for legal advice and to meet him in ^h the back of the church after meetings if you wanted to discuss legal matters.

In 1975, he advised me of the best procedure to follow in making a claim in an automobile accident case.

In 1976, I went to him for advice in handling traffic tickets that had been paid but were still being sent to me in the mail.

He advised many young people like myself on how to handle things like probation violations, traffic tickets and ~~in~~ arrests for things like petty theft.

FF-2-188
OK SC 3/5
OK WT 9/5

Affidavit of Eddie Washington

of the disciples of Christ

my
9/3
61

I am retired. In July 1972, I joined Peoples Temple and in October of that year I was told that anybody needing legal advice should see ^{Timothy D.} Mr. Stoen.

I consulted him about criminal charges that were pending against one of my tenants.

In 1974, he told me what to do when I was threatened with foreclosure of my property.

ok cc 9/5
CW

FF-2-189

Affidavit of Lourece Jackson

my
8/9/73

of the Disciples of Christ ("The Church", "Peoples Temple")

I am a cook. I joined Peoples Temple in 1973; when I joined I knew that Tim Stoen^{ST. J. O. Stoen}
was the lawyer for the church ^{because} as it was frequently announced in the meetings.
^{During 1976/1977} In order to solicit money for donations for the church, I had to obtain a Solicitor's
License, ^{issued by the church} which Tim Stoen had signed as Regal counsel for Peoples Temple. ~~his name~~
~~Tim Stoen~~

OK SC 9/5
AL HT

FF-2-190

my 8/67/3

Affidavit of Robert Wendall Gieg

of the District of Columbia

I am a poultry keeper. I joined Peoples Temple ^{the D. C. Prison} in May of 1969; around that time or somewhat later, I met Tim Stoen who introduced himself to me as the church lawyer.

In 1971, as a conscientious objector to the war in Vietnam, I was required to do "alternate service". I was worried about my status because my employer did not employ me the required number of hrs which was specified to anyone doing "alternate service". I sought and received Tim's ^{advice} as to my legal rights under the circumstances, and what to do.

O.K. E.C. 9/5
on 4/5 9/5

FF-2-191

Affidavit of Byrger Lee Dean

I am a retired housewife. I joined Peoples Temple in 1972 and have known Tim Stoen since then when he was introduced as the church attorney.

He would see people after church services. Over the years, I saw him about a criminal charge pending against my grandson, Michael and a disability case.

He made himself available to many members of the Temple as he announced frequently after meetings that he would counsel people on legal affairs and I remember seeing the line waiting to see him talk to him.

FF-2-192

OK
see 9/5
OK

Affidavit of Rose J Shelton
of the Diocese of the Church of Christ (The Church of Christ)
(Tim)

By profession, I am a retired instructor of cosmetology. I joined Peoples Temple in 1967 and I have known Timothy O Stoen since he joined the church in 1969. He was introduced to me as the attorney representing the church.

I rode ~~as~~ on the same bus as Tim on our regular bus trips to and from Los Angeles, a period of time covering approximately 1971 through 1976. On each trip, Tim would work on legal affairs of the church papers and discuss legal affairs of the church with other members. He asked me on more than one occasion to keep the people on the bus quiet so he could do legal work. I prepared meals for him on the bus and he commented to me many times how much church legal work he had to do, in addition to his work for the Mendocino County District Attorney.

ok
OK 5/5

FF-2-193

Page 9/2 HT
AFFIDAVIT OF VIOLATT ESTHER DILKARD.

By profession I am a nurses aide. I have been a member of Peoples Temple since 1970, and I have known Tim Stoen since that time, ^{until sometime in 1977.} He introduced himself in church services on many occasions as the attorney for Peoples Temple.

In 1971 I spoke with Tim Stoen after a church service in Redwood Valley about my daughter, Claudia Norris who was then in the Youth Guidance Center in San Francisco. Tim Stoen gave me legal advice at that time, and ~~dictated~~ dictated a letter for me to send to the Welfare Department in San Jose, California about her case. I discussed with him on more than one occasion ~~thereafter~~ thereafter, alternative ~~xxxxx~~ legal courses of action to take.

In 1974 I suffered a job related injury. I went to Tim Stoen and we discussed the details of the accident and Tim Stoen gave me legal advice on how to proceed ~~xxxxx~~ so that I would receive my proper benefits. During the next few years we talked about the case periodically and he advised me on each occasion as to what legal steps I should take. The last time I ~~xxxxx~~ recall discussing this injury case with Tim Stoen was in the middle of 1976, when I gave him copies of all the papers I had relating to the case, ~~xxxxxx~~ dating from 1974 on. Tim Stoen said he would review the papers and discuss my case with the attorney from my union (Local 250.) ^{He never} ~~changed me for 27 services, in keeping with church policy.~~

Frequently, in church services and meetings of Peoples Temple, I have heard Tim Stoen give legal advice on church affairs, speaking as the attorney for Peoples Temple, as well as give advice to individual members.

*ok 809/5
OK 45
FF-2-194*

Page 2 9/2 HT

AFFIDAVIT OF DIANE LUNDQUIST

By profession I am a pre-school teacher. I became a member of Peoples Temple in 1969, and I have known Tim Stoen since about that time, Not long after I joined the church, I heard him ^{describe} represent himself as the attorney for Peoples Temple, in church services.

Around 1974, my son, Dov Mario Lundquist, was having problems in school. He was attending Calpella School in Mendocino County, California, and I was disatisfied with the conduct of his teacher, which I felt was physically abusive of my child. I contacted Tim Stoen for his legal opinion about what I could do, and he asked me to come to his office in Ukiah. We talked about the matter, and he advised me to ~~ask~~ call the teacher. He gave me legal advice as to what I should say to her, what would be within my legal rights. I made the call in his presence and at his instruction.

*ok S.C. 9/5-
OK HT*

FF-2-195

Rough 9/3 HT

AFFIDAVIT OF CLARA JOHNSON

By profession I am a certified teacher. I have been a member of Peoples Temple since 1972 and I have known Tim Stoen from that time until 1977. Tim Stoen introduced himself to me as the attorney for Peoples Temple.

Sometime in 1976 I received legal advice from Tim Stoen about the acceptance of a settlement offer ~~xxxxxx~~ I had received, arising out of a car accident at that my daughters had been involved in. Tim Stoen gave me his legal opinion, ~~xxxxx~~ based on our discussion of the merits of the case, that I should accept the offer, which I did.

I often heard Tim Stoen speak in church services at Peoples Temple churches as the attorney for the church, giving legal advice and opinions on church ~~affair~~ affairs. He gave advice to many, many members on their legal affairs, often after church services as part of his function as attorney for the church.

OK EC 8/4
OL HT

FF-2-196

Rough 9/2
HT

AFFIDAVIT OF EARNESTINE MARCH

By profession I am a nurses aide. I have been a member of Peoples
of the Disciples of Christ (The Church) Temple since 1969, and have known Tim Stoen from that time until
early in 1977. He was first introduced to me as the attorney for the
church.

In late 1969 or early 1970 he gave me legal advice regarding
divorce and the community property laws of the State of California.

Over the years, I have seen Tim Stoen speak as a attorney for the
church in public services and meetings on many occasions, giving legal
opinions and advice on church affairs as well as the affairs of individual
members.

OK. E.F. 9/5
OK HT

FF-2-197

Affidavit of Dorothy Ann Brewer

my 2/3
of the Disciples of Christ (Peoples Temple)

By profession, I am a teacher and a secretary. I joined Peoples Temple in 1969. It was mentioned in Peoples Temple meetings that ^{see} members could go to Tim Stoen for legal advice. I specifically remember being told that in 1972, although it may have been announced in meetings previous to that.

In 1973, ^{see} Tim advised me in the transfer of property my husband and I owned. He corresponded with my husband's lawyer on the matter.

He frequently advised members of the congregation to see him after meetings for legal counseling.

OK. E.C. 2/5
OK H. 1/9

FF-2-198

Affidavit of Paulette Jackson

By profession, I am a medical receptionist. I joined the Temple ^{Peoples} in November 1971, and in December of the same year was introduced to Tim O Stoen ^{of the Disciples of Christ (Peoples)} as the lawyer for the Temple.

In 1974, he advised me in the matter of the guardianship of Julie Runnels. He advised me ^{how} to testify in court that I had known the child and her mother and her mother five years although I had actually known her only two years.

In 1974, he also advised me how I could get benefits from the county before I was actually entitled to ~~it~~ ^{it} as Julie's guardian.

OK 9/15 E.C.
CLH

FF-2-199

Affidavit of Rita Jeannette Tupper

of the Disciples of Christ ("People's Temple")

Page 13

I am a housewife. I became a member of Peoples Temple in 1971. ^{periodically} ^{People's} ^{J.D. ("Jim Stoen")} In that same year it was announced publicly in meetings that Temple members should go to Tim Stoen for legal advice and we were even advised to call him at the -----

Between the years 1971 and 1973, he advised me continuously during divorce proceedings against my husband. Before the divorce was finalized, I had temporary custody of my son Larry Howard Tupper. My husband took Larry one weekend and did not bring him home. Tim ^{Stoen} advised me ^{what to do to get my son back.} to go with Diana and Elmer Feltie to my husband's parents house in Richmond, Ca and forcibly take the child.

Again, in conjunction with my son, my husband sent me a check for more than the amount of child support that had been ordered by the court. I felt I should return the extra money ^{and Stoen} but Tim ^{what to do with.} advised me to keep it all. The failure to give back the overpayment led to my husband bringing a cause of action against me.

OK S.C. 9/5

FF-2-200

AFFIDAVIT OF MILLE CUNNINGHAM

Disciples of Christ (Reformed, Presbyterian)
I am a retired domestic worker. I joined Peoples Temple of the
Disciples of Christ (Reformed, Presbyterian) *from* until Feb 28 1977.
in 1971. I have known Tim Stoen *from* that time, I was introduced to

Tim Stoen as the attorney for Peoples Temple, and I heard him so introduce
himself in that fashion on numerous occasions *in and out of church.*

In 1972 I was injured in a car accident. I went to Tim Stoen's office
in Ukiah, California and we discussed the case. He said I should bring
suit and he agreed to handle the case for me. At that time he had me sign
some papers. I spoke with him periodically after that about the case. ~~xxxx~~

He wrote a letter on my behalf. In 1973, Tim Stoen advised me not to take
the first settlement offer, but later that year, he advised me to accept
another settlement offer, which I did. *He did not charge me any money.*

Over the years, while in church services or meetings in Peoples Temple
churches, I have heard Tim Stoen ~~advise~~ frequently give legal ~~advice~~
advice and opinions, as the church attorney, about church affairs and the
legal affairs of various members.

*ok ec. 5/5
PMT*

FF-2-202

Page 2 9/2 H

AFFIDAVIT OF BEATRICE JACKSON

By I am a retired person. ~~xxxxxxPeoples Temple~~ I became a member of ^{of the Disciples of Christ (the church, Peoples Temple)} Peoples Temple in about 1971, and I have known Tim Stoen ^{STC/D (Tim Stoen)} ~~since~~ ^{from} that time, ^{until E6 187.}
~~xxxxxx~~ I was referred to him by a church member, and he introduced himself to me as the attorney for Peoples Temple.

In 1973, after a church service in Los Angeles, Calif. I met with him about property I owned in Abilene, Texas. I asked him for his legal opinion regarding the sale of that property, and he gave me legal advice regarding the sale.

Throughout the time I ~~was~~ have been a member of Peoples Temple, I have heard Tim Stoen publicly, in Peoples Temple services, speak as the attorney for the church, giving legal advice and opinions about church ~~xxxx~~ affairs. He would also give such advice ~~xxxx~~ to individual members. He was often referred to in church services as the attorney for the church, while he was present.

OK E.C. 9/10
OK HT

FF-2-203

Affidavit of Patsy Johnson

of the Disciples of Christ

I am a dancer. I have been a member of Peoples Temple since spring of 1972.

I was aware of the fact that Tim Stoen^{for D. C. Stoen} was the attorney for the Temple in 1973

when he announced that we could see him for legal advice, as a part of the Peoples Temple
Free Legal Services program.

In 1973, I consulted Tim for legal advice. I was involved in an automobile accident and I was required to pay a fine or go to jail. I showed Tim Stoen the ticket I received. He advised me on how to proceed with the matter so that I wouldn't have to go to jail.

In 1973, he advised my mother on an insurance matter in my presence.

D.K. 8/9/74

FF-2-204

AFFIDAVIT OF DORIS HOWARD

Rough 9/2 XT.

~~xxxxxxx~~ I am a retired person. I have been a member of
of the Disciples of Christ (North Carolina) since 1971, and I have known Tim Stoen^{the 2 (Tim Stoen)} from that time
Peoples Temple, since 1971, and I have known Tim Stoen^{the 2 (Tim Stoen)} from that time
until 1977.

Sometime in 1973 I met with Tim Stoen, and he gave me legal advice
about my son, John Haines. He gave me advice about how to handle my son's
case so that it would be to his best legal advantage. From time to time
I consulted with Tim Stoen about the progress of my son's case and he
gave his legal opinion and advice each time.

Throughout the time I have been a member of Peoples Temple, until
1977, when ~~Tim Stoen~~ he left for Guyana, Tim Stoen would be called upon
in services and meetings at the Peoples Temple churches to give legal
advice and opinions concerning church affairs. I have heard him give
such legal advice and opinions, speaking as the attorney for Peoples Temple.
He also gave legal advice ~~me~~ concerning the legal affairs of individual
church members, *always without charge, as a part of the*
church legal services program.

*OK E.C. 9/4
OK XT.*

FF-2-205

Affidavit of Walter Cartmell

7 I am a ~~plc~~ a finished-cabinet maker and a construction worker. I joined Peoples
of the Decker Point
Temple (in 1958, and I met Timothy O Stoen in 1970 shortly after he became a member of
the Temple in Redwood Valley, Ca.

In 1975, ~~the~~ I started the process of adoption of my son, Tyrone Cartmell, which was
later completed by other lawyers. He also advised my wife, Patti on a number of
occasions/ from 1970 until 1977.

pk ec 9/7
H. W.

FF-2-206A

Affidavit of Estelle McCall

I am an insurance broker. I became a member of Peoples Temple in 1973, and ^{THO.} I met Tim Stoen in Houston Texas in 1973.

In 1973, he advised me on the procedure I would have to follow to get my daughter's probation transferred from Houston to Los Angeles, Ca.

Again in 1976, Mr Stoen gave me ^{advice} advice ~~at~~ when my adopted child had been the subject of a kidnap attempt.

He also advised my daughter concerning her probation and prospective change of address in 1973.

OK cc 9/4
BL 1/5

FF-2-207

Affidavit of Donald Jackson

of the Disciples of Christ (Peoples Temple)

By profession, I am a school teacher. I have been a member of ~~Peoples Temple~~ since 1968. I met Tim ^{Tim D. Stoen ("Tim Stoen")} soon after he joined in 1970. He frequently gave legal advice to Peoples Temple members and he had given me his card instructing me to call him at his office ^{at} in the Ukiah County Courthouse.

In approximately April of 1974, I consulted Tim ^{Stoen} about an automobile accident I was involved in; He took care of it expeditiously and no court appearance was required.

Then, in August of 1974, I was involved in ~~a separate~~ another accident that caused severe damage to my legs. He advised me concerning a civil suit which I initiated on this occasion.

In October, 1974, I became eligible for disability benefits which Tim Stoen advised me ~~at to apply for~~ to apply for.

ok ss. 8/4

FF-2-208

AFIDAVIT OF MARSHALL FARRIS

I am a retired warehouseman. I have been a member of Peoples Temple since February, 1970. I have known Tim Stoen from about that time until about January 1977. I heard that he was the attorney for the church from other members and he was introduced to me as such.

In the fall of 1970 I had an accident and lost time on my job. The owner of the boat where I had the accident refused to pay any compensation. Tim Stoen discussed the case with me and gave me legal advice and referred me to ~~xxxxxxx~~ another lawyer in San Francisco.

Tim Stoen gave legal advice and opinions as the attorney for Peoples Temple on church affairs as well as legal affairs of individual members. I heard him do so in church services held at the Peoples Temple churches over the years.

(Tim Stoen)

Rough 9/3 HT

if the Director
of the Church
is called
to the church

Church

OK EC
9/3 HT

~~XXXXXXXXXX~~
FF-2-209

Affidavit of Velma Barnes

By profession I am a nurse's aid. I joined Peoples Temple in 1971; in the same year Timothy O Stoen was introduced to me as the attorney for Peoples Temple.

In 1973, I was injured on the job and Mr Stoen advised me to bring an action ~~for~~ to recover damages. In 1972, I had received legal advice from Mr Stoen concerning a divorce. Again in 1972, I consulted him in the purchase of real estate.

FF-2-210

Rough 9/3
HT

AFFIDAVIT OF LEMUEL THOMAS GRUBBS II

By profession I am a schoolteacher. I became a member of Peoples Temple since February 1968. I have known Tim Stoen from sometime in 1969. I met him when he first began coming to the church in 1969. He very soon became the attorney for the church and introduced himself in church services as such.

In 1971 I met with Tim Stoen at his home in Redwood Valley and discussed the adoption of Kevin, Kelly and Clark Smith. He agreed to handle the adoption and drew up adoption papers which my wife and I signed at his direction. ~~xxxx~~ We spoke to him at a later date and he drew up a second set of adoption papers, as the first had been misplaced. ~~He was given money for filing fees. However, Tim Stoen never completed the adoption.~~

In 1974 I received legal advice from Tim Stoen ~~xxx~~ about getting a divorce. Tim Stoen gave me legal advice about the proceedings and the community property laws of the State of California. He drew up papers for the divorce proceeding which I signed in his presence and at his direction.

Tim Stoen over the years spoke as the church attorney, giving legal opinions and advice on church affairs on numerous occasions, in church services and meetings held at Peoples Temple churches.

N.E.S. 9/11
CLW

FF-2-211

Rough 9/3 HT

AFFIDAVIT OF MARLENE WHEELER

By profession I am a primary school teacher. I became a member of Peoples Temple in 1970. I have known Tim Stoen from about sometime in 1969. He introduced himself in public church services as the attorney for Peoples Temple.

In 1971 I consulted with him about my status as a Welfare ~~recipient~~ recipient. He gave me legal advice as to my rights, and as to what course of conduct would be in my best legal interest.

*EC 7/4/8
OK HT

FF-2-212

Rough 9/2 FF

AFFIDAVIT OF JUANITA GREEN

of the Discipline of Christ Church, the State of

I am a retired person, I have been a member of Peoples Temple since 1970.

I have known ^{ST-10 (Tim Stoen)} Tim Stoen from that time until 1977. He introduced himself in church services as the attorney for Peoples Temple.

In 1974 I received ~~xxxxxx~~ legal advice from him about property I had inherited from my parents. ~~I gave him my deeds, and he agreed to handle the matter so as to insure my best legal advantage. I discussed the matter with him periodically over the next year.~~

Tim Stoen represented himself in Peoples Temple church services and meetings as the attorney for the church ~~on~~ many times over the years. I have heard him give legal opinions and advice on ^{the} church affairs in these meetings, speaking as the attorney for the church.

OK EC 9/2-
Jm P

FF-2-213

Rough 9/2 NR

SEE AFFIDAVIT OF VERNON DEAN GOSNEY

~~By profession~~ I am a cook. I have been a member of Peoples Temple ^{of the Disciples of Christ (Peoples Temple)} since 1972, and have known Tim Stoen ^{Tim Stoen} from that time until February 1977.

Tim Stoen was introduced to me as the attorney for Peoples Temple.

In 1974, I receive legal advice from Tim Stoen about my status as a welfare recipient.

Again in 1974 I received legal opinions and advice from Tim Stoen about a lawsuit I was considering against John Muir Hospital in California for malpractice.

Frequently, over the years, I have heard Tim Stoen give legal opinions and advice on church affairs as the attorney for Peoples Temple. This was in public church services and meetings at the different Peoples Temple churches.

2/5 E.P. 9/14
OK HT

FF-2-214

Rough 9/2
4 to Director of Civil (1744) (1744) (1744)
AFFIDAVIT OF MARY CANADA

I am a retired person. I became a member of Peoples Temple in 1971.

to 0-1744-1744
I have known Tim Stoen from that time until early in 1977. He was introduced to me as the attorney for the church.

Sometime in 1974 I consulted Tim Stoen about my deceased husband's pension. Tim Stoen gave me his legal opinion that I had several thousands of dollars due to me, and gave me legal advice on the matter. I received legal advice from him on this matter, ~~ex~~ subsequently, on more than one occasion.

Over the years, Tim Stoen would often speak as the Church attorney, in public meetings and services at the different Peoples Temple churches. ~~XXXX~~ He would give legal advice and opinion on church affairs and the legal affairs of individual members.

O.K. E.C. 9/14
OK HT

FF-2-215

Rough 9/2 HR.

AFFIDAVIT OF ELIZA JONES

of the Discipline of Christ (People's Temple)

I am a retired person. I first joined Peoples Temple in about 1970, and I have known Tim Stoen^(as Tim Stoen) from that time until early in 1977.

I was involved in a car accident in 1975 in Redwood Valley, California. I spoke with Tim Stoen about the accident and he gave me legal advice about my liability and what I should do.

Over the years I have heard Tim Stoen speak as the attorney for Peoples Temple on many occasions during church services, when he would be asked for his legal opinion on different church matters. He also gave legal advice and opinions to individual members during and after church services at the different Peoples Temple churches.

2/6 ES 7/4
OK HT

FF-2-216

AFFIDAVIT OF EVELYN THOMAS

By profession I am a clerk-typist. I became a member of Peoples Temple[^] in 1971, and I knew Tim Stoen ^{the D.I. Tim Stoen} from that time until 1977. He introduced himself to me as attorney for Peoples Temple.

Sometime in 1974, I was faced with the prospect of losing my job at Central Valley National Bank in Oakland. Tim Stoen gave me legal advice about retaining my job, as well as ~~financial~~ my financial affairs.

Frequently in Peoples Temple meetings and services at the different churches, Tim Stoen would be called upon for his legal advice and opinions on church affairs. He would give legal ~~advice~~ advice and opinions, ~~acting~~ speaking as the attorney for Peoples Temple. I have heard him do this on numerous occasions.

ok E.E. 9/4.
NT OK

FF-2-217

Page HT 1/2
abt 1/1
AFFIDAVIT OF GLADYS SMITH

By profession I am a nurses aide. I have been a member of Peoples Temple since 1971 and I have known Tim Stoen from that time until he left for Guyana in the early part of 1977. I heard from different members that he was the attorney for the church, and he was introduced to me as such.

Sometime in 1976, my husband and I spoke with Tim Stoen about one of my children, ~~Tim Stoen gave us legal advice on how to handle it~~ who had been shoplifting. Tim Stoen gave us legal advice on how to handle the matter, so as to ~~work it out~~ best help my son's legal position.

*OK 9/14
HT OK*

FF-2-218

Ask Gen?

John F. Kennedy Center for the
the Arts

Medi-Cal payments for patients in the nursing home I operated.
I was the owner-operator of a ~~64~~⁶⁶ bed Convalescent Hospital
in Rossmore, Calif with ^{monthly} accounts receivable in excess of \$ ~~_____~~
per month. Many of the patients were Medi-Cal supported.
During the spring of 1975 I began to experience difficulty
in obtaining medical payment for the Medi-Cal program.
When the difficulty began to affect the financial strength
of the business, I went to Timothy D Stoen, as the attorney
for the County. He gave advice on how best to proceed.
He advised me concerning the matter ~~which I began to~~
~~return if you wish to~~ ~~at a conference~~
~~to another attorney who conducted the matter.~~
OK. E.C. 7/4 EF-2-210

OK. E.P. 9/4

FF-2-219

Affidavit of Peter Wotherspoon

I am a school teacher. I have been a member of Peoples Temple since 1971. *photo*
I met Tim Stoen in 1971 when he introduced himself to me as a member of Peoples Temple and the attorney for the Temple. *of the Director of Cal. Dept. of Social Services, San Francisco*

In 1973, he advised my wife and I in the proper procedure for purchasing and later of real property in Calpella, Ca. He was my next door neighbor at the time, *from 1971 through* 1973, and I saw him almost daily working on George Temple's apartment *his home*.

OK 8/8/74
BLC TH

FF-2-220

Rough 2/2 HT

AFFIDAVIT OF ~~CHRISTINE BOWERS~~ aka CHRISTINE TALLEY

By profession I am a housewife. I have been a member of Peoples Temple ^{of the Disciples of Christ, Inc. (COP)} since about 1970 and I have known Tim Stoen ^(Tim Stoen) from that time until about 1977. I was introduced to Tim Stoen as the attorney for the church by my sister, Marlene Wheeler.

Around 1974 I was living with my aunt who was not a member of the church. Tim Stoen gave me legal advice about different ~~alternatives~~ legal ~~alternatives~~ courses of action I could take to free myself from my aunt's control.

He gave me legal advice about my sister Marlene getting guardianship over me, so I could remain in the church.

I have often heard Tim Stoen, over the years, give legal advice and opinions as the attorney for the church, concerning church affairs, in Peoples Temple church services and meetings. He also gave legal advice to many members of Peoples Temple as part of the church legal service program.

*OKed. 2/4
CWT*

FF-2-221

Rough H/T 9/2

AFFIDAVIT OF EDRENA SMITH AKA DEE DEE SMITH

By profession I am a secretary. I have been a member of Peoples Temple *of the Disciples* since about 1971 and I have known Tim Stoen *aka (The Stoen)* from that time until late in *1976* *Chant*. I was introduced to Tim Stoen as the attorney for Peoples Temple. *(Peoples Temple)*

As I best can recall, in the early Spring of 1976 Tim Stoen gave me legal advice ~~regarding guardianship~~ *Peoples Temple* about having a church member become my guardian. ~~He directed June Crym, a legal secretary and a member of the church to draw up the proper legal papers.~~ *Peoples Temple* He also gave me legal advice about how I should deal with my mother, so she would remain agreeable to my attending church, and not oppose the guardianship.

*ok cc 9/4
CU HT*

H-2-222

Affidavit of Cardell Deal

By profession, I am a school teacher. *of the Disciples of Christ*
I joined Peoples Temple in 1970.
I soon met Tim ^{Stoen} Stoen who was introduced to me as the attorney for the Temple.

In 1972, I consulted Tim Stoen on my status as a perspective draftee. ~~as I~~
And he gave me some advice.
~~was conf~~

deal
In 1974, he advised my mother on the ^U procedure to follow when my brother was arrested.

OK EC 8/4
DL W.

FF-2-223

Affidavit of Virginia Middleton ^{people Temple of the Disciples of Christ (the church)}

I am retired. I joined the ^{people Temple of the Disciples of Christ} Temple in 1973. In 1973, I became aware ^{that Timothy O'Steen} ~~of Tim's~~
^{was} being the attorney for the church when he announced in a meeting that he would be seeing
people after the meeting who might need legal advice.

In 1973, he gav ^{me} e advice concerning alimony payments ^{that} I was entitled to
by court order.

ok EC 8/4
B/L

FF-2-224

Rough 9/2 45

AFFIDAVIT OF GAILIE MITCHELL.

I am a ~~xxxxx~~ retired ~~xxxxxxx~~ tailor and seamstress. I have been a ~~xxx~~ member of ^{of the Disciples of Christ ("The Church")} Peoples Temple since about 1973. I have known Tim Stoen from that time until he left for Guyana in early 1977. I was introduced to Tim Stoen as the attorney for the church.

In ~~1975~~ the Spring of 1975 Tim Stoen gave me legal advice about property left to me by my husband, John A. Mitchell, who had recently died. Tim Stoen ^{filed a probate proceeding and later} met with me at the courthouse in Los Angeles and he helped me straighten out some paperwork on the ~~property~~ property. He gave me legal advice regarding my financial situation after my husband's death. He also advised me on a number of business matters.

He made no charge for his services. They were given as part of the church program of meeting peoples needs, especially people like me who could never have afforded a expensive lawyer.

ok 8/1 7/4
OK 4/4

FF-2-225

AFFIDAVIT OF IDA MAY NICHOLS

*Roughly #1
7/2
of the Director of the U.S. Customs Service*

I am a retired person. I became a member of Peoples Temple in 1973.
I have known Tim Stoen ~~since~~ ^{from} that time, until the latter part of 1976.

I was referred to him as the attorney for Peoples Temple by one of the members.

Around 1974 or 1975 I contacted Tim Stoen and he legal advice about property that I felt I was entitled to. Tim Stoen explained my legal position and agreed to look into the matter on my behalf, which he did.

~~Tim Stoen~~

*OK E.C. 9/4
W.D.*

FF-2-226

AFFIDAVIT OF RUTH ANN TUPPER

~~By [redacted] I am a child care worker. I have been a member of Peoples Temple since about 1970. I have known Tim Stoen~~^{840. ("Justin")}~~from that time until the beginning of 1977.~~

My parents were separated when I was about 12 years old. About that time, my mother, brothers and sisters, and I became members of Peoples Temple. Periodically, my mother and I became concerned that my father, Lawrence Tupper, might try to obtain custody over myself and my brothers and sisters. On several occasions I consulted Tim Stoen for legal advice regarding ~~xxxx~~ what I should say to my father, and how I should conduct myself with him, ~~xx~~ and Tim Stoen gave me that legal advice. Tim Stoen also indicated to me that there were other people in the church with a similar problem and he had given them legal advice as well. Sometime in 1972 my father was threatening to take my mother to court in order to obtain custody. I spoke with Tim Stoen ~~xxxxxxxxxxxx~~ several times about what could be done to prevent ~~this~~, and he gave me legal advice on what to say in court. He went over my testimony with me several times in order to prepare me for the hearing. At his direction I wrote a statement that ~~xxx~~ was submitted to my father's lawyer. Tim Stoen also consulted with Alan Davidson, a lawyer to whom he had referred my mother and myself, about the case.

I have heard Tim Stoen, over the years, public speak in Peoples Temple services and meetings of Peoples Temple, as the attorney for the church, and give legal advice and opinions on church matters in that capacity.

OK ES. 9/5
OK HT 9/5

FF-2-227

Affidavit of Wanda Swinney: (1 of 1)

of the Disciples of Christ Peoples Temple "Branch"

I am a buss driver, and have been a member of Peoples Temple since 1968. I have known Tim Stoen^{Tim Stoen} since he joined the Church in 1969.

Over the years he gave me legal advice on a series of matters, both personal and community. I received advice about a custody matter in 1971, about a community O.E.G. issue in 1971, about a shooting incident in 1974.

During much of my time with Peoples Temple I was one of the drivers of our fleet of busses. Tim Stoen would periodically instruct us^{drivers} on rules of the road, licensing and other regulations, and how to deal with the Police if we were stopped for any ~~purpose~~ reason. He also advised on the rules and regulations with respect to the operation of the citizen band radios with which the busses were equipped

FF-2-228

Rough 9/2 HT.

AFFIDAVIT OF ~~XXXXXXXXXXXX~~ KATHRYN JACKSON, nee KATHRYN GRAUMANN

BY profession I am a ^{medical} laboratory assistant. I have been a member of ~~of the Disciples of Christ (Peoples Temple)~~ ^(Peoples Temple) Peoples Temple, since 1969. Tim ^{Stoen} ~~Stoen~~ became a member of the church soon after, and I have known him from that time until early 1977. He quickly assumed a prominent role in church affairs, ~~and~~ became a member of the Board, and took on the function of attorney for the church.

During the years 1971 and 1972 I did ~~xxxxxxx~~ research for Tim Stoen at his request. He had me research ~~xxxxxxx~~ the newspaper columns of one Lester Kinsolving. He explained to me that he wanted all the background on Mr. Kinsolving that I could find so that he could give the church Board a legal opinion on what course of conduct to follow with regard to Mr. Kinsolving.

Frequently, over the years, I have heard Tim Stoen give legal advice and opinions, speaking as attorney for Peoples Temple, on church affairs in public church services and meetings at the various branches of Peoples Temple. He also gave legal advice and opinions to many, many church members over the years, as apart of his function as attorney for the church.

OK. 9/1 EC.
HT 9/1

FF-2-229

I filed for a divorce with Timothy Stoen. I did not want to ask my ex husband for alimony and Jim Stoen asked for more alimony than Jim Cobb could afford so Cobb's lawyer ~~that~~ wrote to Jim. The only thing is the lawyer following Jim finished the legal work.

My mother left a grocery store & other property when she died he gave me legal advice how to get my share of the money.

all of this however has been several years ago, seven or more years -

Christina Young

FF-2-233

He gave Dorothy Worley legal advice
about her divorce. She was
in P.C. meetings when he was
there & Dorothy & Christine Young
were present & marched around
the Examiner. (Paula)

Chailin, I don't know if it was you or Tos
that advised us on where to go, what to
do & what to say in Ukiah Courthouse
when Chris stole a car. (neither does Harold)

Loretta Cordell
Also was he there to give advise to go to
L.A. & find Monique's mother for her to be
able to come over here. We needed the
papers signed & we (Annette Jones & myself)
were told to go to L.A. & find her to sign the
papers.

FF-2-234

WVWV

+ June Luyon - bring here exemplars of rough drafts of TDS letters where signed as counsel, letter.

Exp rough drafts of pleadings or corporate documents.

+ NOT many - but covering a span of years

+ names of cases he represented PT on -

+ some case file + Law office reports.

June Luyon - affidavit - very detailed detailing role as atty - her role as legal secretary, from Mendocino down / kinds of matters he dealt w/ based on her taking her dictation for you - / describe research on Klorine cases + specific ^{decisions} ~~decisions~~ re: Harvis cases.

→ TAX AFFIDAVITS - TDS signed some.

BRING MEDLOCK FILE - ANYTHING - ORIG. DEEDS - TDS HANDWRITTEN

PAPER, LISTING AGREEMENT

+ ASK FROLICH ABT DEALING - C. STDEN AS COUNSEL FOR PT.

+ LA APARTMENT DEAL: CHECK LA SUIT WE HAD AGAINST

THE OWNER - TDS HANDLED PART OF THAT DEAL.

(CLOSING THE TRANSACTION) AND LA APARTMENT FILE

(in closed real estate file) There are handwritten

motivations on by TDS.)

FF-2-241

Tim Stone advised ~~of~~ Tom Kice and myself
how to act and what to say to the sheriff
when we went to the sheriff about the
Pepsi Cola ~~rip~~ (Jim Cobb - Mickey T)
when they split and took a gun and
money from us.

He also knew that I was wired for
sound. This was September 1973
D. L. Touchette Charlie Touchette
FF-2-243

Affidavit of Inez Connedy

my
8/9/73

I am a retired nurse. I joined ^{George} the Temple ^{of the Disciples of Christ} in 1971. I needed to see an attorney and was referred to Tim Stoen ^{of the} who introduced himself as the attorney for the Temple.

In the fall of 1971 or 1972, I consulted Mr Stoen about real property I had inherited.

Again in 1973 or 1974, he gave me legal advice concerning a car accident I was involved in.

Over the years, in my presence ^{or to my knowledge} he advised and assisted literally hundreds of members of Peoples Temple.

ok to 9/15
D.V. H.

FF-2-244