

NEIL T. DUDDY

1 Q. Then I want to go on now to the egg throwing
2 incident. I gather you had a chance to review those notes
3 last night; is that correct?

4 A. Yes, the notes that you gave me, two sheets.

5 Q. Well, are there any other notes, to your
6 knowledge, of that incident?

7 A. I don't recall.

8 Q. Well, in reviewing the materials that you
9 prepared for this deposition, have you seen any other
10 notes?

11 A. I didn't have my files, Mr. Morgan.

12 Q. When you looked at them over the weekend, did
13 you see any indication of any other notes?

14 A. No.

15 Q. Okay. Now --

16 A. But I'm not certain.

17 Q. All right. First, who -- I think my question
18 the other day was: Who actually had their homes or their
19 residences splashed with paint, hit by eggs?

20 A. I don't recall.

21 Q. Well, will your notes refresh your recollection
22 in that regard?

23 A. No.

24 Q. Well, let me read -- what I am going to do now
25 is ask you to go to page 132 --

26 A. [Witness complies.]

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1 Q. -- of your manuscript, Exhibit 405.

2 All right. Now do you see the passage where you
3 wrote "Most people who have left" and "have left" we can
4 assume is the Local Church; is that right, sir?

5 A. Correct.

6 Q. Okay. So it reads, "Most people who have left
7 find it necessary to relocate altogether to avoid
8 persecution. Even then, ex-members are not insured peace.
9 Ex-Anaheim church members now living in Denver, Colorado,
10 have had their houses egged or splashed with paint, in
11 addition to receiving verbal threats and harangues either
12 face to face or by telephone." That's the end of the
13 quote.

14 Now, first, was it your intention to convey to the
15 readers, that if a person decides to leave the Local Church
16 that person will then be persecuted by the other members of
17 the Local Church?

18 A. No.

19 Q. Well, when you wrote "Most people who have left
20 find it necessary to relocate altogether to avoid
21 persecution," what did you intend to convey by that?

22 A. I think the text speaks for itself, Mr. Morgan.
23 Most people.

24 Q. Oh, I see. In other words, are you saying that
25 some people can leave the Local Church and not have any
26 persecution and others will have persecution; is that what

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1 you intended to convey?

2 A. I intended to convey that most people, who
3 left, find it necessary to relocate altogether to avoid
4 persecution.

5 Q. Okay. Now did you talk to any ex-members who
6 didn't feel they were being persecuted?

7 A. Yes.

8 Q. All right. Who were the persons that you spoke
9 to that didn't feel they were persecuted?

10 A. There was a couple in their early, mid-20's who
11 came to the SCP office, who's been involved with the
12 Local Church, for an indefinite time. There was a
13 commitment of some length, but I don't recall what it was.
14 Probably around two years.

15 I don't have their names at my recall. But they
16 had moved and were living in Santa Rosa, California, and
17 they were not persecuting.

18 Q. And they hadn't moved because of any fear of
19 persecution, had they?

20 A. I don't recall.

21 Q. Well, did you ask?

22 A. I don't recall.

23 Q. Did you make any notes of that conversation?

24 A. I don't recall.

25 Q. Well, have you seen any such notes?

26 A. No.