

1 MR. GRIDLEY: Let's have the question read then,
2 please.

3 [Record read as follows:]

4 THE REPORTER: "Question: If you make the
5 assumption that the relatives and the friends
6 and society are all outside the scope of the
7 Local Church, did you have any opinion with
8 respect to the Local Church that it was their
9 aim to isolate the member from those relatives
10 outside the Local Church?"

11 [Sotto voce discussion between the witness and
12 his counsel.]

13 MR. WOODRUFF: Q. Can you answer the question
14 the way it's posed?

15 A. Inasmuch as isolating can be termed as
16 restricting or narrowing the scope of the relationship
17 with the relative, and that aim emphasizes a notion of
18 by-product, the answer is yes.

19 Q. Okay. If I told you that I intended you to
20 understand by my use of the word "isolating" meaning a
21 motion of quarantine -- do you understand what a
22 quarantine is?

23 A. Yes.

24 Q. All right. I'll rephrase the question for
25 you this way: Was it your intent to depict the Local
26 Church generally as having the aim of quarantining

1 members from relatives who themselves were outside the
2 Local Church?

3 MR. MORGAN: Object to the question as leading.

4 THE WITNESS: Yes.

5 MR. WOODRUFF: Q. So when the complaint says
6 that -- uses the term "isolating" the member, if the
7 understanding of the term "isolating" is to the concept
8 of quarantining, is it your testimony that it was your
9 aim to show that there was an objective on the part of
10 the Local Church to isolate, quarantine members from
11 relatives who are outside the Local Church?

12 MR. MORGAN: Object in that it has been asked and
13 answered.

14 MR. WOODRUFF: It's okay. I am trying to clarify
15 it.

16 THE WITNESS: Yes, inasmuch as quarantine brings
17 the notion of narrowing and restricting that relationship
18 and adjusting it from its prior relationship.

19 MR. WOODRUFF: Q. Did you have any understanding
20 of what the Local Church's impact was on family members
21 by the exercise of any of these techniques that you've
22 described on the members of the church?

23 A. Yes.

24 Q. Did you make a study of that?

25 A. Yes.

26 Q. Excuse me. I'll rephrase it.