

1 A IT'S DIFFICULT TO REMEMBER EVERYTHING THAT WENT ON THEN,
2 BUT IT SEEMS TO ME THAT IT HAD IN PART TO DO WITH AN EXPERIENCE
3 BY ONE OF THE PROFESSORS, JIM BRADLEY, WITH THE LOCAL CHURCH
4 AND A CONCERN ABOUT THEIR DOCTRINE OF THE CHURCH OR THEIR
5 ECCLESIOLOGY, WHICH HE UNDERSTOOD TO BE SOMEWHAT EXCLUSIVIS-
6 TIC, THAT IS, WE HAVE THE TRUTH, NOBODY ELSE DOES, OR WE ARE
7 THE CHURCH.

8 (LETTER, BULLETINS AND COPY OF TELEPHONE
9 BILL MARKED FOR IDENTIFICATION AS
10 PLAINTIFF'S EXHIBIT 16.)

11 Q (BY MR. MORGAN) LET ME SHOW YOU WHAT'S BEEN MARKED AS
12 EXHIBIT 16 AND I WILL ASK YOU IF YOU CAN IDENTIFY WHAT THAT
13 IS.

14 A YES, THIS IS A LETTER FROM BILL FREEMAN TO THE ACADEMIC
15 AFFAIRS COMMITTEE. BILL AND I HAD HAD A CONVERSATION --
16 FOLLOWING MY MEETING WITH THE ACADEMIC AFFAIRS COMMITTEE I
17 THEN WENT BACK TO BILL AND ASKED FOR INFORMATION REGARDING
18 THE LOCAL CHURCH AND HIS AFFILIATION WITH THAT, AND THIS
19 LETTER OUTLINES SEVERAL POINTS, ONE CONCERNING THE ORTHODOXY
20 OF THE LOCAL CHURCHES; SECONDLY, CONCERNING COOPERATION;
21 THIRDLY, CONCERNING THE BOOK, THE GOD-MEN; FOURTHLY, CONCERN-
22 ING THEIR STANDING AND ATTITUDE AND INTENTION AND FIFTHLY,
23 CONCERNING ANY NEGATIVE PERSONAL EXPERIENCES.

24 MR. MORGAN: I WILL OFFER THAT INTO EVIDENCE AT
25 THIS TIME, YOUR HONOR.

26 THE COURT: MAY BE RECEIVED. THAT IS NUMBER 16?

27 MR. MORGAN: YES.

28 Q OKAY, NOW, FIRST, IT IS CLEAR, IS IT NOT, THAT MR.
FREEMAN FULLY DISCLOSED TO THE SEMINARY THAT HE WAS A MEMBER OF

1 THE LOCAL CHURCH?

2 A THAT'S CORRECT.

3 Q IN EXHIBIT 16 HE REFERS TO THE GOD-MEN AND THAT WAS THE
4 PUBLICATION THAT WAS OUT IN 1977, IS THAT CORRECT?

5 A THAT'S RIGHT.

6 Q THAT'S THE PUBLICATION THAT HAS BEEN MARKED EXHIBIT 2,
7 IS THAT RIGHT?

8 A I BELIEVE SO.

9 MR. MORGAN: WE HAVE BEEN REFERRING TO THAT AS
10 GOD-MEN I, IF YOU MAY RECALL, YOUR HONOR.

11 THE COURT: YES.

12 Q (BY MR. MORGAN) MR. FREEMAN THEN RESPONDED TO CERTAIN
13 INQUIRIES REGARDING INFORMATION THAT WAS IN THE GOD-MEN,
14 IS THAT RIGHT?

15 A NO.

16 Q LET ME CALL YOUR ATTENTION TO THE SECOND PAGE WHERE IT
17 SAYS CONCERNING COOPERATION, AND IF YOU WILL JUST LOOK AT THE
18 FIRST PARAGRAPH AND SEE IF THAT WILL REFRESH YOUR RECOLLECTION

19 A YES. I DON'T BELIEVE THAT THE BOOK WAS OUT, IF YOU LOOK
20 AT PAGE 3 --

21 THE COURT: YEAH, I JUST NOTICED THAT TOO. THE
22 BOOK COULDN'T HAVE BEEN OUT, IF YOU READ HIS PAGE 3.

23 THE WITNESS: WHAT WE HAD, IF I REMEMBER RIGHT,
24 WAS A DRAFT OR A PAGE PROOF OR SOMETHING LIKE THAT.

25 MR. MORGAN: ACTUALLY IT WAS OCTOBER 1977 IT CAME
26 OUT AND THIS LETTER IS FEBRUARY 3RD. HE MAY BE WORKING OFF OF
27 A DRAFT.

28 THE COURT: MAYBE HE WASN'T AWARE THAT IT WAS

1 PUBLISHED IN '77 BECAUSE THE LETTER SEEMS TO SAY "ALL I CAN SAY
2 AT THIS TIME IS THE BOOK IS NOW IN THE PROCESS OF BEING WRITTEN

3 MR. MORGAN: THAT COULD BE THE NEXT ONE. FORGIVE
4 ME. THAT IS MR. FREEMAN'S RESPONSE. IN OTHER WORDS, THE
5 LOCAL CHURCH WAS GOING TO WRITE A RESPONSE TO THE GOD-MEN
6 AND THAT IS WHAT HE IS REFERRING TO AND I CAN HAVE MR. FREEMAN
7 TESTIFY TO THAT. THE BOOK WAS OUT, YOUR HONOR. IT IS OCTOBER
8 OF 1977.

9 Q OKAY, NOW LET ME ASK YOU THIS. AFTER YOU RECEIVED THIS
10 LETTER, WHAT WAS THE NEXT THING THAT OCCURRED? I WANT TO ASK
11 ONE MORE THING, THOUGH.

12 ("A SIMPLE PRESENTATION" BY WITNESS LEE
13 AND CHURCH MARKED FOR IDENTIFICATION AS
PLAINTIFF'S EXHIBIT 17.)

14 Q (BY MR. MORGAN) EXHIBIT 17. DID THAT ALSO COME ALONG
15 WITH IT?

16 A I DON'T REMEMBER, TO BE HONEST WITH YOU.

17 MR. MORGAN: OKAY, WE WILL JUST LEAVE THAT FOR
18 THE MOMENT, YOUR HONOR, THEN.

19 Q NOW, AFTER RECEIPT OF THAT LETTER, WHAT OCCURRED NEXT
20 AS FAR AS FULLER SEMINARY?

21 A AS I REMEMBER IT, I TOOK THIS LETTER -- THERE'S A LITTLE
22 BIT OF BACKUP INFORMATION ATTACHED TO IT AND I TOOK THIS
23 LETTER TO THE COMMITTEE AND HAD THEM TAKE A GOOD LOOK AT IT.

24 THEY THEN WOULD HAVE GONE AHEAD AND MADE A DECISION
25 ON BILL'S SITUATION.

26 Q AND DID THEY MAKE A DECISION?

27 A THEY DID MAKE A DECISION.

28 Q AND WHAT WAS THAT DECISION?

1 A THE DECISION WAS TO ADMIT BILL, TO RECOGNIZE THAT HE
2 WAS PART OF THE LOCAL CHURCH, THAT WE DID HAVE PERHAPS
3 QUESTIONS ABOUT THE LOCAL CHURCH, BUT AS FAR AS WE WERE
4 CONCERNED WE WERE NOT MAKING A JUDGMENT ON THE CHURCH AS MUCH
5 AS WE WERE BILL FREEMAN.

6 AS A RESULT, WE ACCEPTED HIM INTO THE PROGRAM TO FINISH
7 A DEGREE.

8 (LETTER FROM LANE TO FREEMAN DATED
9 7/21/78 MARKED FOR IDENTIFICATION AS
PLAINTIFF'S EXHIBIT 18.)

10 Q (BY MR. MORGAN) LET ME SHOW YOU WHAT'S BEEN MARKED AS
11 EXHIBIT 18 AND ASK YOU IF YOU CAN IDENTIFY WHAT THAT IS.

12 A THIS IS A DENIAL LETTER. IT IS A LETTER IN WHICH
13 JANICE LANE, WHO WORKED FOR ME IN THE ADMISSIONS OFFICE, DENIED
14 HIM ON THE BASIS OF A LOW GRADE POINT AVERAGE AND RAISED
15 QUESTIONS ABOUT HIS RELATIONSHIP WITH AND PARTICIPATION IN
16 THE LOCAL CHURCH.

17 Q BUT THEY ACTUALLY IN TURN THEREAFTER ADMIT HIM?

18 A THEY DID.

19 Q IF YOU'D LOOK AT THAT AGAIN, MR. ROBECK, DOESN'T IT
20 SAY THAT HE IS ACCEPTED AS A SPECIAL STUDENT ON PROBATION?
21 THAT IS FOUND IN THE FIRST --

22 A YEAH, I SEE FARTHER DOWN IN THE PARAGRAPH. YES. HE WAS
23 ACCEPTED AS A SPECIAL STUDENT OR ON PROBATION FOR A PERIOD OF
24 ONE YEAR OR FOR HOWEVER LONG IT WAS NECESSARY TO BRING HIS
25 GRADE POINT AVERAGE UP TO A 2.5. THEN HE WAS TOLD HE COULD RE-
26 APPLY.

27 MR. MORGAN: I WILL OFFER THIS LETTER IN EVIDENCE,
28 YOUR HONOR.

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THE COURT: IS THAT EXHIBIT 18?

MR. MORGAN: 18, YOUR HONOR.

THE COURT: MAY BE RECEIVED.

Q (BY MR. MORGAN) ON THE SECOND PAGE DOES THE SEMINARY ADVISE MR. FREEMAN OF THEIR QUESTIONS ABOUT HIS PARTICIPATION IN THE LOCAL CHURCH?

A THEY DO.

Q THEN FROM THAT POINT ON MR. FREEMAN CONTINUED AND RECEIVED A DEGREE FROM FULLER, DID HE NOT?

A THAT'S CORRECT.

Q AT ANY TIME WAS THERE A SPECIAL PRE-ENTRANCE SCREENING COMMITTEE CONVENED TO DETERMINE THE PROPRIETY OF ADMITTING BILL FREEMAN?

A NO. WHAT OCCURRED WAS WHAT WOULD NORMALLY HAPPEN FOR ANY PERSON IN WHICH THERE WERE QUESTIONS. THAT IS THE REGULAR ADMISSIONS COMMITTEE LOOKED AT IT, THEY DECIDED THAT THERE WERE STILL QUESTIONS THAT THEY'D PREFER TO HAVE THE ACADEMIC AFFAIRS COMMITTEE LOOK AT, BUT THAT WAS A STANDING COMMITTEE.

Q AT ANY TIME DID THE FULLER SEMINARY OR THE FACULTY DETERMINE THAT HIS THEOLOGY WAS PUBLICLY SOUND? DID THEY MAKE SUCH A JUDGMENT?

THE COURT: SOUND, DID YOU SAY?

MR. MORGAN: SOUND. I AM READING FROM THE BOOK, YOUR HONOR.

THE WITNESS: ON BILL FREEMAN?

Q (BY MR. MORGAN) YES.

A WITH RESPECT TO BILL FREEMAN I BELIEVE HE TALKED WITH

1 JEFFREY BROMLEY AND PERHAPS TO JIM BRADLEY AND THEY -- MY
2 PROBLEM IS I AM HAVING A DIFFICULT TIME REMEMBERING WHETHER
3 THIS WAS BEFORE OR AFTER.

4 Q LET'S SAY AT THE TIME OF ADMISSION WAS THERE A DETERMINA-
5 TION BY FULLER SEMINARY AT THAT POINT THAT HIS THEOLOGY WAS
6 BIBLICALLY SOUND?

7 A BASED ON WHAT HE HAD SUBMITTED TO ME IN THE FILE, WE FELT
8 HIS THEOLOGY WAS SOUND. THAT MADE NO JUDGMENT WHATEVER
9 ON THE CHURCH.

10 Q IN YOUR DEALING WITH MR. FREEMAN DID YOU FIND HIM TO BE
11 COOPERATIVE?

12 A VERY.

13 Q AND DID HE RESPOND TO ANY INFORMATION THAT YOU WANTED
14 FROM HIM?

15 A EVERYTHING I ASKED FOR I RECEIVED.

16 Q WAS THERE EVER ANY INDICATION EVEN AS OF TODAY OF ANY
17 MISREPRESENTATION BY HIM?

18 A NONE THAT I AM AWARE OF.

19 Q WAS THERE EVER ANY INDICATION EVEN AS OF TODAY OF ANY
20 CONCEALMENT BY MR. FREEMAN?

21 A NO.

22 Q NOW, TO YOUR KNOWLEDGE, DID THE SCREENING COMMITTEE
23 REVIEW THE MATERIAL THAT MR. FREEMAN SENT TO THEM?

24 A IF I REMEMBER RIGHTLY, JIM BRADLEY WAS ASKED TO REVIEW
25 THE MATERIAL. HE WAS THE ONE ON THE COMMITTEE WHO HAD RAISED
26 THE QUESTION IN THE FIRST PLACE AND AT A SECOND MEETING CAME
27 BACK AND SAID "WHILE I STILL HAVE QUESTIONS ABOUT SOME OF
28 THIS, I THINK BILL IS FINE."

1 Q DID ANYBODY EVER SAY THAT THE FACULTY, THE SCREENING
2 COMMITTEE HAD NEITHER READ NOR HEARD OF WITNESS LEE'S
3 WRITINGS?

4 A IF THEY DID, I DON'T KNOW WHO THAT WAS.

5 Q AND HAD MR. FREEMAN SUPPLIED TO THE SEMINARY MATERIALS
6 DEALING WITH WITNESS LEE'S WRITINGS?

7 A YES.

8 Q HAS THERE EVER BEEN ANY STATEMENT BY ANYBODY, TO YOUR
9 KNOWLEDGE, THAT ANYBODY SAID THAT IF FULLER HAD REALLY KNOWN
10 THE FULL EXTENT OF WITNESS LEE'S THEOLOGY THEY WOULD HAVE
11 SERIOUS CONCERNS ABOUT MR. FREEMAN BEING ADMITTED?

12 A COULD YOU ASK THAT QUESTION AGAIN, PLEASE?

13 Q SURELY, YEAH.

14 FIRST LET ME ASK YOU THIS. ARE YOU AWARE OF ANY MEMBER
15 OF THE SCREENING COMMITTEE WHO HAS MADE THE STATEMENT THAT IF
16 HE OR SHE HAD KNOWN OF WITNESS LEE'S TOTAL THEOLOGY THEY
17 WOULD HAVE HAD SERIOUS CONCERNS ABOUT MR. FREEMAN?

18 A NO, I AM NOT.

19 Q AFTER GOD-MEN II CAME OUT, THAT'S -- I DON'T KNOW WHERE
20 IT IS RIGHT NOW. I GUESS IT IS UP ON HIS HONOR'S DESK.

21 THE COURT: I THINK THE CLERK HAS IT.

22 MR. MORGAN: I HAVE GOT ONE HERE.

23 Q AFTER GOD-MEN CAME OUT, EXHIBIT 5, DID YOU MAKE -- AND
24 IN THE BOOK WHERE -- STRIKE THAT. LET ME START ALL OVER
25 AGAIN.

26 DID YOU LEARN THAT THERE WAS SOME QUESTION RAISED IN A
27 PUBLICATION BY SCP THAT THERE HAD BEEN SOME ELEMENT OF CONCEAL-
28 MENT OR MISREPRESENTATION BY MR. FREEMAN?

1 A I HEARD THAT.

2 Q AND AFTER THAT DID YOU MAKE SOME INVESTIGATION TO SEE IF
3 FACULTY MEMBER HAD MADE STATEMENTS SUCH AS THAT THE FACULTY
4 MEMBERS SCREENING COMMITTEE HAD NEITHER READ NOR HEARD WITNESS
5 LEE'S TEACHINGS AND SERIOUS RESERVATIONS ABOUT THIS ELDER'S
6 ADMITTANCE WOULD HAVE RESULTED HAD LEE'S TOTAL THEOLOGICAL
7 POSITION BEEN DISCLOSED?

8 A I THINK I DID SOME CHECKING, BUT I DIDN'T DO ANYTHING
9 FORMAL, PER SE.

10 Q BUT DID YOU DO CHECKING TO SEE IF ANYBODY HAD SAID THAT?

11 A YES, I DID.

12 Q WHAT WAS THE RESULT OF THAT?

13 A NOBODY COULD REMEMBER HAVING EVER SAID ANYTHING LIKE
14 THAT.

15 Q IN THE COURSE OF YOUR CHECKING DID YOU ALSO CHECK WITH
16 DR. JEFFREY BROMLEY?

17 A YES, I DID.

18 Q WHAT WAS HIS RESPONSE?

19 A HIS RESPONSE WAS THAT HE WOULD NEVER HAVE SAID ANYTHING
20 LIKE THAT.

21 Q INCIDENTALLY, WHAT WAS DR. BROMLEY'S RELATIONSHIP WITH
22 FULLER?

23 A DR. BROMLEY WAS PROFESSOR OF CHURCH HISTORY AT THE
24 SEMINARY.

25 Q IS HE STILL WITH THE SEMINARY?

26 A IN AN EMERITUS CAPACITY, YES.

27 Q WHERE IS HE PRESENTLY?

28 A HE IS CURRENTLY IN SCOTLAND, AS FAR AS I AM AWARE.

1 Q DO YOU RECALL IN 1980 OR AT SOME TIME THEREAFTER HAVING A
2 CONVERSATION WITH A MR. JAMES SIRE, S-I-R-E, OF INTER-VARSITY
3 PRESS?

4 A YES, I DID.

5 Q DO YOU RECALL HAVING A CONVERSATION WITH HIM ABOUT MR.
6 FREEMAN?

7 A YES.

8 Q DO YOU RECALL IN THAT CONVERSATION YOUR MAKING THE
9 STATEMENT TO MR. SIRE THAT BILL, BILL FREEMAN, WAS AS FORTH-
10 RIGHT AS POSSIBLE ABOUT WHAT THE LOCAL CHURCH BELIEVED?

11 A YES.

12 Q AND WAS THAT YOUR HONEST BELIEF AT THAT TIME?

13 A YES.

14 Q DID YOU ALSO AT THAT TIME MAKE THE STATEMENT TO MR. SIRE
15 THAT YOU DID NOT THINK MR. BROMLEY OR DR. BROMLEY WOULD HAVE
16 MADE SUCH A STATEMENT?

17 A AS WHAT?

18 Q THE ONE ABOUT THE FACULTY MEMBERS SCREENING COMMITTEE
19 HAD NEITHER READ OR HEARD WITNESS LEE'S TEACHINGS AND SERIOUS
20 RESERVATIONS ABOUT THIS ELDER'S ADMITTANCE WOULD HAVE
21 RESULTED HAD LEE'S TOTAL THEOLOGICAL POSITION WOULD HAVE DIS-
22 CLOSED?

23 A YES, I PROBABLY DID.

24 Q ACTUALLY THE FULLER SEMINARY DID RAISE SOME QUESTION
25 ABOUT WITNESS LEE'S THEOLOGICAL POSITION, DIDN'T IT?

26 A THAT'S CORRECT.

27 Q AND IT DIDN'T CHANGE THAT, DID IT, AT THAT TIME?

28 A NO.