

1 A I'M MUCH MORE ACQUAINTED WITH THE TECHNICAL DEFINITION OF
2 A CULT, BUT I CAN GIVE YOU MY IMPRESSION OF WHAT PEOPLE THINK OF
3 WHEN THEY HEAR THE WORD CULT, AS SOMETHING RESEMBLING THE CHURCH
4 OF SATAN OR JIM JONES OR CHARLES MANSON OR HARI KRISHNAS OR THE
5 MOONIES, WHICH I THINK ARE THOUGHT TO BE SEMI SECRET, MANIPULATIVE,
6 NONCHRISTIAN GROUPS WHO ARE SEDUCING THE PUBLIC IN SOME WAY
7 TOWARD AN EVIL END.

8 THE COURT: DOCTOR, IN THE COMMON LANGUAGE TODAY, SECRET
9 DOESN'T SEEM TO -- YOU KNOW THE MASONS ARE SECRET.

10 THE WITNESS: AND THE MASONS HAVE BEEN CALLED A CULT.

11 THE COURT: MAYBE THEY ARE IN YOUR DEFINITION. WHAT I AM
12 TRYING TO FIND OUT IS, IN OUR COMMON UNDERSTANDING, I THINK OF
13 PEOPLE AND CULTS TODAY, IS THERE ANYTHING THAT ASSOCIATES THEM
14 WITH SOME FORM OF MIND-CONTROLLING, MIND-INFLUENCING?

15 THE WITNESS: OH, YES, I THINK SO.

16 THE COURT: IS THAT PART OF YOUR UNDERSTANDING TODAY?

17 THE WITNESS: IT MAY NOT HAVE BEEN THE TERMS. I THINK
18 THE DEVIOUSNESS, THE MISREPRESENTATION OR THE EVEN COUNTER-
19 CULTURAL DIMENSION OF IT.

20 THE COURT: WELL, LET'S SAY, FOR INSTANCE, WE HEAR THE
21 TERM IN THIS DAY AND AGE WHICH HAS BEEN RELATIVELY NEW,
22 "BRAINWASHING." WOULD YOU, IN THIS DAY AND AGE, ASSOCIATE
23 BRAINWASHING WITH CULTS?

24 THE WITNESS: I THINK THAT DEFINITELY THE TERM BRAINWASHING
25 HAS BECOME ASSOCIATED WITH CULTS, THAT THEY BRAINWASH PEOPLE
26 AGAINST THEIR WILL, AGAINST THEIR BETTER JUDGMENT, FOR ENDS THAT
27 ARE NOT GOOD. BUT THAT'S A JUDGMENT.

28 THE COURT: YES, I UNDERSTAND THIS IS YOUR OPINION, AND

1 YOU ARE TESTIFYING AS AN EXPERT GIVING AN OPINION.

2 AND YOU FEEL THAT WHAT YOU HAVE JUST STATED IS WHAT THE
3 GENERAL PUBLIC IN THIS DAY AND AGE IS PUTTING ON THE WORD "CULT"?

4 DOES THE AVERAGE PERSON, WHEN HE READS A STORY AND IT SAYS
5 "THIS IS A CULT," DOES HE ASSOCIATE IT, IN YOUR OPINION, TO SOME
6 FORM OF RELIGION THAT'S MIND-CONTROLLING, BRAINWASHING, SECRET,
7 SOME OF THE THINGS THAT YOU HAVE SAID?

8 THE WITNESS: YES, I THINK, WITHOUT QUESTION.

9 THE COURT: YOU MAY BELIEVE THIS, BUT DO YOU ALSO FEEL
10 THAT THE AVERAGE PERSON --

11 MR. MORGAN: I THINK THAT'S WHAT HE WAS ANSWERING.

12 THE COURT: YES.

13 THE WITNESS: I DON'T THINK THERE IS ANY QUESTION ABOUT
14 IT. I THINK, FOR EXAMPLE, NOT ONLY IN THE GENERAL PUBLIC BUT IN
15 THE EDUCATED PUBLIC WHO ARE EITHER -- IN OTHER FIELDS OF STUDY.
16 FOR EXAMPLE, I THINK THAT MY COLLEAGUES WHO ARE NOT STUDENTS OF
17 THE PSYCHOLOGY OF RELIGION OR THE SOCIOLOGY OF RELIGION, MY
18 COLLEAGUES PERHAPS IN NEW TESTAMENT OR MY COLLEAGUES IN WORLD
19 MISSIONS, IF SOMEBODY WAS TO SAY TO THEM, SUCH AND SUCH A GROUP
20 IS A CULT, THOSE ARE THE EXACT ASSOCIATIONS THEY WOULD HAVE.

21 THE COURT: OKAY.

22 Q (BY MR. MORGAN) NOW WILL YOU TELL US WHAT YOU DID TO
23 CARRY OUT THE ASSIGNMENT THAT WE REQUESTED OF YOU?

24 WHAT I WOULD LIKE YOU TO DO IS TO GO THROUGH, JUST IN
25 GENERAL TERMS, THE VARIOUS THINGS YOU DID IN -- TO ASSIST YOU IN
26 FORMULATING CERTAIN OPINIONS.

27 A FIRST OF ALL, I ASKED FOR MATERIALS, BOTH THIS MANUSCRIPT
28 AND OTHER MATERIALS THAT MIGHT HELP ME. AND I WAS PROVIDED WITH