

1 THE WITNESS: OKAY.

2 THE COURT: WHEN WE ARE TALKING ABOUT THE COMMON LAYMAN'S
3 UNDERSTANDING OF A CULT THAT'S BAD AND DANGEROUS, THEY ASSOCIATE
4 IT WITH CERTAIN ORGANIZATIONS, PROBABLY, IS WHERE THEY GET THE
5 IDEA THAT THIS FORMS -- THEY ARE ASSOCIATED WITH THESE ORGANIZA-
6 TIONS.

7 I WANT YOU TO TELL ME WHAT IS -- WE KNOW JIM JONES,
8 BECAUSE HE CAUSED SO MANY OF THOSE PEOPLE TO KILL THEMSELVES --
9 (INAUDIBLE).

10 THE REPORTER: EXCUSE ME, AGAIN.

11 THE COURT: WHAT IS IT, IN YOUR OPINION, THAT IS BAD WITH
12 RESPECT TO THESE CULTS?

13 THE WITNESS: I'M FORMULATING THIS SORT OF RIGHT NOW.
14 I WOULD THINK TWO THINGS: ONE IS A CENTRALIZED AUTHORITY WHO IS
15 INTENTIONALLY, AND THIS IS THE SECOND REASON MANIPULATING
16 SOCIAL PROCESSES FOR DEVIIOUS ENDS.

17 THE COURT: OKAY.

18 THE WITNESS: SEEMS TO ME, IN THAT CASE, YOU HAVE GOT TO,
19 ONE, PROVE THERE IS A CHARISMATIC FIGURE WHO HAS THAT KIND OF
20 AUTHORITY AND USES IT IN A WAY THAT MANIPULATES SOCIAL INFLUENCE
21 FOR DEVIIOUS ENDS, FOR ENDS THAT ARE NOT FULLY APPARENT.

22 THE COURT: AND WOULD THOSE ENDS BE GOOD ENDS OR EVIL
23 ENDS?

24 THE WITNESS: WELL, THE IMPLICATION OF A CULT IS THAT
25 THEY ARE DEVIIOUS ENDS. I WOULD SAY, AND THIS IS A GENERALIZATION,
26 THAT THE PRESUMPTION IS MADE IS THAT THE CULT LEADER PRIMARILY
27 WANTS CONTROL OVER THE PERSONS, THOUGH THEY MAY USE AN IDEOLOGY,
28 YOU KNOW, WHICH SAYS, I'M TELLING YOU ABOUT THE DIVINE LIGHT, OR

1 I'M TELLING YOU ABOUT THE CHRISTIAN FAITH, THAT THE REAL MOTIVA-
2 TION IS SOCIAL OR PERSONAL, INDIVIDUAL CONTROL.

3 THE COURT: THAT HELPS ME A GREAT DEAL, WHAT YOU JUST
4 SAID THEN. SOME OF THIS STUFF I UNDERSTAND, BUT I THINK WE ARE
5 GETTING AT THE HEART OF IT BECAUSE WE ARE DOING A LOT OF TALKING
6 ABOUT CULTS BUT NOT REALLY TRYING TO UNDERSTAND IT. YOU ARE
7 HELPING ME NOW TO UNDERSTAND IT.

8 OKAY.

9 Q (BY MR. MORGAN) LET ME PURSUE THAT A LITTLE FURTHER,
10 DOCTOR. IS IT YOUR OPINION THAT EXHIBIT 1 IS CONVEYING TO THE
11 READERS THAT IN THIS CASE, WITNESS LEE IS THAT CHARISMATIC
12 LEADER WHO IS ENGAGING IN DECEIT AND MANIPULATING THE MINDS OF
13 THE PEOPLE IN THE CHURCH FOR SOME DEVIOS PURPOSES AND TO GAIN
14 CONTROL OF THEM?

15 A. YES. IT SAYS -- IF THE BOOK IS SAYING WITNESS LEE KNOWS
16 ALL THERE IS TO KNOW ABOUT SOCIAL INFLUENCE PROCESSES, COMING
17 FROM THE SOCIAL BEHAVIORAL SCIENCES HAS INTENTIONALLY DECIDED TO
18 USE THEM ON INDIVIDUALS AND GROUPS UNDER PRETENSE OF ONE THING
19 BUT THAT WITNESS LEE REALLY WANTS, HIS PRIMARY GOAL IS TO HAVE
20 CONTROL OF PEOPLE'S LIVES.

21 Q AND BASED UPON YOUR STUDY AND INVESTIGATION, IS THAT
22 TOTALLY FALSE?

23 A I THINK IT'S INVALID. TOTALLY FALSE.

24 Q THANK YOU. NOW LET'S DO THIS, AND I THINK MAYBE WHAT WE
25 OUGHT TO GO TO IS THE TEST THAT YOU TOOK.

26 MR. MORGAN: LET ME MARK THIS AS EXHIBIT 24. MAYBE IF I
27 COULD ASK YOU TO STAPLE IT, IT MIGHT BE A LITTLE EASIER TO DEAL
28 WITH