

1 AND I CAN PUT YOUR MIND AT EASE, BECAUSE WE HAD THEOLOGIANS ON
2 THE OTHER DAY.

3 A OKAY.

4 Q HAVE YOU FORMED ANY OPINION WHETHER THERE WAS ANY MIND
5 MANIPULATING BY WITNESS LEE OR THE LEADERS OF THE LOCAL CHURCH
6 THROUGH THEIR TEACHINGS OR THEIR PRACTICES?

7 A OR THEIR PRACTICES?

8 Q RIGHT.

9 A YES, I HAVE FORMED AN OPINION.

10 Q WHAT IS YOUR OPINION?

11 A THAT THERE WAS NONE. I AM EQUATING THE PHRASE "MIND
12 MANIPULATING" WITH THOUGHT CONTROL, WITH BRAINWASHING.

13 Q ALL RIGHT. FINE.

14 A THERE WAS SOCIAL INFLUENCE.

15 Q AS OPPOSED TO IF WITNESS LEE IS TEACHING THE BIBLE AND HE
16 IS ENCOURAGING PEOPLE TO LIVE A HIGHER LIFE THAN THE TEN
17 COMMANDMENTS? THAT IS SOME FORM OF TEACHING, IS IT NOT?

18 A OF TEACHING, YES.

19 Q SO OBVIOUSLY, HOPEFULLY IT WILL HAVE SOME EFFECT ON THE
20 MIND OF THE INDIVIDUAL?

21 A INDEED.

22 Q ALL RIGHT.

23 A I, FOR EXAMPLE, AS PART OF MY DATA GATHERING, I CONTACTED
24 ONE OF THE PRIME EXPERTS IN THE DEPARTMENT OF DEFENSE, MAJOR
25 ROBERT DUSSERT, D-U-S-S-E-R-T, WHO HAS NO PRIOR CONNECTION WITH
26 THE LOCAL CHURCH, AS FAR AS I KNOW. AND I SUBMITTED TO HIM SOME
27 MATERIALS, AND HE THEN DIALOGUED, I REACHED A CONCLUSION, HE
28 REACHED A CONCLUSION, AND WE TRIED TO COMPARE NOTES. AND AS HE

1 SAID, "I SEE THE PRACTICES AS PART OF EDUCATION OR TEACHING OR
2 SOCIAL INFLUENCE. THE PRACTICES OF THIS CHURCH DO NOT MEET THE
3 CRITERIA OF BRAINWASHING AS UNDERSTOOD IN THE LITERATURE AND BY
4 THE DEPARTMENT OF DEFENSE." AND THAT'S THE SAME CONCLUSION I
5 REACHED, BRAINWASHING, MIND CONTROL OR THOUGHT REFORM.

6 Q ALL RIGHT. HAVE YOU FORMED ANY OPINION AS TO WHETHER
7 EITHER IN THE TEACHINGS OR THE PRACTICES THERE IS SOME THREAT OR
8 COERCION TO KEEP THE MEMBERS IN THE CHURCH?

9 A GENERALLY, YES, IN GENERAL.

10 Q WHAT IS THAT OPINION?

11 A THAT THERE IS NO THREAT OR COERCION.

12 Q ALL RIGHT.

13 A THERE IS ENCOURAGEMENT.

14 Q HAVE YOU FORMED ANY OPINION AS TO WHETHER THERE HAS BEEN
15 ANY PSYCHOLOGICAL DAMAGE OR WHETHER THERE EVEN SHOULD BE ANY
16 PSYCHOLOGICAL DAMAGE ON A MEMBER BECAUSE OF EITHER THE TEACHINGS
17 OR THE PRACTICES OF THE LOCAL CHURCH?

18 A YES.

19 Q WHAT IS YOUR OPINION?

20 A MY OPINION IS THAT THERE IS NO EVIDENCE TO THAT EFFECT.

21 Q ALL RIGHT. THANK YOU. ANOTHER ONE.

22 HAVE YOU FORMED ANY OPINION THAT EITHER IN THE TEACHINGS
23 OR THE PRACTICES THAT THERE IS SOME FORM OF ENCOURAGEMENT OF
24 ENGAGING IN IMMORAL ACTS AND JUSTIFYING IT BECAUSE "INSIDE OF ME
25 IT SAYS OKAY"?

26 A YES, I HAVE FORMED AN OPINION.

27 Q WHAT IS YOUR OPINION?

28 A I FIND NO EVIDENCE FOR THAT. STRONG EVIDENCE THE OTHER

1 WAY.

2 Q ALL RIGHT. IN THE TALKING TO THE EX-MEMBERS OF THE LOCAL
3 CHURCH AND IN READING THE DEPOSITIONS OF MR. SMITH AND MR.
4 PAYNTER, DID YOU FORM ANY OPINION THAT THERE WAS SOME LOSS OF
5 MENTAL ACUITY BY PEOPLE ONCE THEY LEFT THE LOCAL CHURCH?

6 A I HAVE FORMED AN OPINION.

7 Q WHAT IS YOUR OPINION IN THAT REGARD?

8 A ON THE BASIS OF MY TALKING WITH EX-MEMBERS, I SAW
9 ABSOLUTELY NO EVIDENCE FOR THAT. THEY ARE ALL FULLY FUNCTIONING
10 HUMAN BEINGS.

11 Q LET'S JUST TALK ANOTHER MOMENT ABOUT YOUR STUDY. DO YOU
12 FEEL THAT THAT STUDY IS A FAIR REPRESENTATION OF THE RESPONSES
13 OF BOTH EX- AND PRESENT MEMBERS OF THE CHURCH IN REGARD TO THOSE
14 QUESTIONS?

15 A LET ME SAY YES TO THAT AND THEN QUALIFY IT.

16 Q BY ALL MEANS.

17 A IT IS A MUCH FAIRER REPRESENTATION THAN THE DATA ON WHICH
18 THIS BOOK WAS WRITTEN. FROM AN IDEAL POINT OF VIEW, AND THIS
19 NEVER HAPPENS, ALMOST NEVER HAPPENS IN SOCIAL SCIENCE RESEARCH,
20 IT WOULD BE NICE TO HAVE RANDOM SAMPLES OF EX-MEMBERS AND A
21 LARGER NUMBER OF SURVEYS, BUT MORE TIMES THAN NOT, WE ARE
22 CONTENT IN THIS KIND OF RESEARCH WITH THIS LEVEL OF DATA, WHAT
23 ARE CALLED VOLUNTEER SAMPLES.

24 Q OKAY. SPEAKING ABOUT THE MANUSCRIPT, EXHIBIT 1, WHAT IS
25 IT ABOUT THEIR METHODOLOGY, IF THERE IS SUCH, THAT YOU FEEL YOUR
26 APPROACH WAS FAIRER?

27 A THEY MADE NO ATTEMPT, AS FAR AS I CAN TELL, OTHER THAN IN
28 AN ADVERSARIAL ROLE, TO DO ANY INTERVIEWING OF THE EXPERIENCE OF