

1 Q Now, in the end of paragraph 7 you talk about,
2 "Instead of a move of God, even the most casual
3 observer, apprised of the facts, will see the end
4 result of the Chapel's misguided conduct". And by the
5 facts, you mean the facts that were made known to you?

6 A If non-professional, average persons had the
7 information I had and were subjected to the reports
8 that were given to me and, in fact, in addition to that
9 were apprised in a general sense of the media coverage,
10 including the coverage of the Cole incident, I forget
11 the child's name, she was drowned by her mother, having
12 that kind of information it's my opinion that it's
13 fairly obvious that we have some major problems here.

14 Q So, even a person not trained in sociology would come
15 to that same conclusion, based on the evidence that
16 you've looked at?

17 A Based on the evidence I mentioned, yes, I think so.

18 Q And the conclusion they would come to was that the
19 result of the facts that you are aware of resulted in
20 devastated marriages and I assume that means where the
21 marriage broke up.

22 A Yes, or at least harmed to the point of practically
23 breaking up.

24 Q And that that resulted in attempted suicides?

25 A There were reports of attempted suicides.

1 Q So, the average person apprised of the facts you know
2 would say all the attempted suicides were caused by the
3 move of God or the teachings about the move of God?

4 A The attempted suicides were related to a multiplicity
5 of factors including the various facets of, quote, a
6 move of God teaching.

7 Q And the convicted child molesters, so the move of God
8 then you think caused people to become child molesters?

9 A No, I'm not saying that, I'm saying that there's on
10 record several convictions for child molestation of
11 people who were in leadership at the church. That
12 combined with the other information that I mentioned
13 here, including divorces, devastated marriages, and
14 suicides, whatever the cause, adds up to a pretty
15 dismal scene.

16 Q And you say that you're aware of leaders of the church
17 that were convicted of child molestation?

18 A I believe I would have to check my notes here. To the
19 best of my knowledge, I believe one or more of those
20 persons were in a counseling role or had some contact
21 with, in that sense, leadership.

22 Q Okay. And irreparable dislocation, what does that
23 mean?

24 A That's a reference to family dislocations as a result
25 of some families staying with the church, staying with

COPY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

BRIANA HAVILAND, a minor by
CATHERINE CROWLEY, Ph.D., her
guardian ad litem,

Plaintiff,

vs.

COMMUNITY CHAPEL and BIBLE TRAINING
CENTER; ROBERT MANN and ALETA MANN,
husband and wife, and the marital
community comprised thereof,

Defendants.

NO. 93-2-25996-4

DEPOSITION OF RONALD ENROTH, Ph.D. - VOLUME I

Appearances

For the Plaintiff:

KIMBERLY KONAT (AM Session)
SIDNEY J. STRONG (PM Session)
Strong & Kydd
1616 Bank of California Center
900 Fourth Avenue
Seattle, WA 98164

For the Defendants:

ROBERT J. ROHAN
Rohan, Goldfarb & Shapiro
1601 One Union Square
600 University Street
Seattle, WA 98101-3112

BE IT REMEMBERED that Volume I of the deposition
of RONALD ENROTH, Ph.D. was taken in the above cause on the
24th day of March, 1995 at Seattle, Washington, before
Carol J. Sorensen, Notary Public.

WHEREUPON, the following proceedings were had,
to wit:

**Sandra
Baker &
Associates** Court Reporters
and Legal
Video Service

870 10th Lane, Fox Island, Washington 98333

Tacoma 206.272.9288, Seattle 206.622.9919, Bremerton 360.373.9032, Olympia 360.352.0099, Fax 206.549.2918

1 (Exhibit No. 118 marked for identification.)
2 RONALD ENROTH, Ph.D., having been first duly sworn on oath
3 by the notary, was deposed and testified as follows:
4

5 E X A M I N A T I O N

6 BY MR. ROHAN:

7 Q Would you state your full name, sir.

8 A Last name Enroth, E-N-R-O-T-H, Ronald M., as in
9 Matthew.

10 Q And your residence address?

11 A 681 Circle Drive, Santa Barbara, California 93108.

12 Q Where are you employed?

13 A Westmont College, that's one word, W-E-S-T-M-O-N-T,
14 Santa Barbara.

15 Q Is Westmont College a conservative evangelical based
16 school?

17 A Yes, that's fair to say, a four-year liberal arts
18 college.

19 Q It's evangelical Christian; is that right?

20 A Yes, it's not church-related but it has that
21 orientation. In other words, it's not part of a
22 denomination.

23 Q And what denomination, if any, are you a part of?

24 A Presbyterian Church USA.

25 Q How many students are at Westmont?

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A 1,200.

Q How many faculty?

A Approximately 70.

Q And you're a full-professor; is that right?

A Yes, sociology.

Q Do they have a sociology department?

A Yes, sociology and anthropology.

Q How many professors are sociologists that are at Westmont?

A Four full-time and one half-time person. The half-time person is actually in social welfare.

Q And what are the areas of specialization -- You're one of the four full-time; is that right?

A Yes.

Q What are the other three full-time professors, what is their area of specialization?

A One of them sociological research methods and sociological theory and complex organizations, the other third world development and modernization, and the third person is actually an anthropologist, a cultural anthropologist with interests in Latin American studies, Latin American cultures, and myself.

Q And the anthropologist, does he or she have a sociology background?

A Some, yes. Her degree, her doctorate is in

1 Q Who is the chair of the Department of Sociology?

2 A I am.

3 Q I'm going to hand you what's been marked as Exhibit 118
4 to your deposition and I'll tell you it's a document
5 that was furnished to me by counsel for Briana
6 Haviland. Is that a document that you prepared?

7 A Yes.

8 Q Is that a bio sheet on you as well as your curriculum
9 vitae?

10 A Yes, it is.

11 Q Is it up-to-date?

12 A To the best of my knowledge, yes.

13 Q Is there anything, any of the writings, the books and
14 other publications that appear on the curriculum vitae,
15 are there any of those that you have authored with
16 which you now disagree or think are inaccurate?

MS. KONAT: Objection, over-broad.

17
18 A I don't believe so, not to my knowledge.

19 Q (By Mr. Rohan) And do you understand that if an
20 objection is made by counsel that it's made for the
21 record and, unless she instructs you not to answer, you
22 are to answer the question?

23 A Yes.

(Exhibit No. 119 marked for identification.)

24
25 Q Handing you what's been marked as Exhibit 119 to your

1 deposition, is that a memo that you prepared and then
2 signed on the second page?

3 A Yes, it is.

4 Q And I'm going to direct your attention to the first
5 page, item 5. Are those a list of deposition and trial
6 testimony that you have given as an expert witness?

7 A Yes.

8 Q Can you explain to me what the nature of the first case
9 Ryan and Ryan was about?

10 A Yes. Mr. Ryan was requesting full custody of his four
11 minor children. He and his wife were in the process of
12 getting a divorce or actually they were divorced and
13 both of them had been members of a group called the
14 Body of Christ, it has used several names but Body of
15 Christ, a group which I had some familiarity with. And
16 the husband had left the group, his wife remained in
17 the church and he was requesting custody of the four
18 children and retained me as an expert witness.

19 Q Did you testify at a deposition in that case?:

20 A Yes, I did.

21 Q Did you testify at trial in this case?

22 A It did not go to trial. I was in court. The matter
23 was resolved in family court before actual testimony
24 was given but we were in court that day.

25 Q Do you have a copy of that deposition?

1 A Perhaps the last one, in fact indeed the last one
2 Christianity Today has reviewed one or more of my
3 books.

4 Q Do you recall which one or more?

5 A Churches That Abuse, I believe but I'm not positive
6 The Jesus People, and possibly, again I would have to
7 check, I don't recall but I believe Youth, Brainwashing
8 and the Extremist Cults.

9 Q All right. Looking at the next page of Exhibit 118,
10 which is the first page of your curriculum vitae, it
11 says you have a Ph.D. in Sociology from the University
12 of Kentucky. Can you tell me in what area of sociology
13 you obtained the Ph.D. in?

14 A My focus of study was in medical sociology for both the
15 master's and the Ph.D.

16 Q And I assume medical sociology is not related to your
17 study of the sociology of religion or new religious
18 movements; is that right?

19 A It's not unrelated but it's not directly related. In
20 other words, approaches to an understanding of health
21 care and response to illness does involve the variable
22 of religion, and in my research in eastern Kentucky in
23 the Appalachian region, religion including snake
24 handling cults, religion in those kinds of factors were
25 a part of the larger milieu, if you will, of health

1 care, health care delivery, and response to human
2 illness. So, in that sense there was a connection with
3 medical sociology. In other words, the cultural and
4 social context of illness and illness behavior and
5 health practitioners includes the religious dimension
6 at some point.

7 Q Was the title of your research that was done for your
8 Ph.D. health care delivery and response to human
9 illness?

10 A It was, as is typical of doctoral dissertations, it was
11 a long title but it included health care delivery in
12 rural Appalachia. That was the main focus of the
13 dissertation.

14 Q And the health care delivery was not referring to the
15 delivery of snake handling, is that right? It was
16 referring to the delivery of traditional Western
17 medicine?

18 A Yes.

19 Q And your BA in sociology from Houghton College, what
20 was the focus of your sociology training in
21 undergraduate?

22 A It was general, general sociology. There was no
23 particular focus. And for both my master's and
24 doctorate it was also in addition to a focus, it was
25 general sociology. In other words, it covered a broad

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A Yes.

Q And you have also formed opinions as to -- Do you consider them a cult?

A Yes, I do.

Q Okay. Are they also a new religious movement?

A Not really because they come out of or they are related to Pentacostalism which, again, it depends on how you define new. Pentacostalism in North America has been here since the beginning of this century, so in that sense it wouldn't be a new phenomenon within the last decade or two. They're not new to the American scene because of their heritage, although Pastor Barnett's heritage.

Q And you found that -- You made the finding based on your research that other groups that you've investigated have been a cult; is that correct?

A Yes.

Q And in any of those groups that you've found to be a cult, have your research methods been presented in any articles that are subject to peer review?

A No. I have chosen to do most of my publication in widely circulated trade books rather than the typical scholarly journals because it's impossible to do both, very difficult to do both.

Q To your knowledge, have any other scholars sought to

1 being asked to give any opinions that are other than
2 the ones that appear in Exhibit 121?

3 A I was not restricted to this. It was suggested that if
4 I had any opinion with regard to the organization as it
5 might impact children, and I don't think that that has
6 been addressed in this particular document, for
7 example. Again, I would have to review it carefully.
8 I do mention, however, on page 6 ex-members reporting a
9 pattern of harm involving especially family and marital
10 relationships. I would want to elaborate on that kind
11 of thing more than is found here, if that's what you're
12 asking.

13 Q Okay.

14 A So, there would be some additional comments I would
15 make, yes.

16 Q Have you spoken with any member of the Haviland family?

17 A No, I have not.

18 Q And have you spoken with the defendant, Robert Mann or
19 a member of his family?

20 A No, I have not.

21 Q And other than the -- Have you talked to any former or
22 current parishioner of Community Chapel in the last
23 three years?

24 A Yes.

25 Q Have you talked to any former person in the Chapel in

1 Q (By Mr. Rohan) You have admitted on prior occasions to
2 having a bias in terms of your sociological opinions;
3 isn't that correct, sir?

4 A I have a value position because I am a person of faith.
5 I'm not necessarily saying that I have taken a value
6 position in terms of my work as a sociologist. I wear
7 two hats and I wear a hat of sociologist and also a
8 person of faith. And for me, and because of the kind
9 of institution where I teach and the kind of writing
10 that I do, the integration of my faith and learning is
11 imperative. And so in the sense that my work is
12 informed by my faith, I have that kind of value
13 orientation, yes.

14 Q That value orientation would be as a conservative
15 evangelical Christian; is that correct?

16 A Right, and I make reference to that in most of my
17 books.

18 Q The next sentence here talks about that you were able
19 to attend one session of Sunday School and one morning
20 worship service at Community Chapel, and by Sunday
21 School you mean adult Sunday School; is that correct?

22 A Yes.

23 Q You never attended a Sunday School for children at
24 Community Chapel, did you?

25 A No.

1 Q And has anyone ever described to you what occurred in
2 any Sunday School for children classes at Community
3 Chapel?

4 A Not to my knowledge, Sunday School, not the Christian
5 school but the Sunday School.

6 Q Correct. Page 3 and 4 of your declaration contains a
7 list of individuals and these are individuals that you
8 informally interviewed; is that correct?

9 A Yes.

10 Q These are all former parishioners at Community Chapel;
11 is that correct?

12 A I believe so, yes.

13 Q Do you know, did any of these individuals leave
14 voluntarily from Community Chapel?

15 A Yes.

16 Q Did all of them leave voluntarily from Community
17 Chapel? And the list goes over to the next page, sir.

18 A I do not know whether all of them left
19 voluntarily.

20 Q Is it your recollection at least most of them left
21 voluntarily from discussions with them?

22 A Yes, I think that would be fair to say.

23 Q Is it your recollection that any of them that were
24 disfellowshipped were disfellowshipped only after they
25 had voluntarily left Community Chapel?

1 me what courses you took that were in psychology?

2 A They were not in psychology but I, for example, had a
3 course "The Social Aspects of Mental Health", and in a
4 course like that you would be exposed to materials both
5 from sociology and psychology and social psychology and
6 psychiatry, so in that kind of context I'm familiar
7 with the psychological literature. That would be an
8 example of what I mean by behavioral science.

9 Q Are there any courses you took that were psychology
10 courses when you were either at Houghton College or at
11 the University of Kentucky?

12 A Not at the graduate level. At my undergraduate college
13 I did have a course in Introduction to Psychology, but
14 I did not specifically take psychology courses because
15 that was not part of my program, in other words,
16 courses offered by the Department of Psychology. That
17 does not mean I haven't had course work that includes
18 psychological dimensions.

19 Q And then what does the word social mean in this phrase
20 psycho-social?

21 A Very briefly, it means group and intergroup dynamics,
22 the larger interaction of a group with individuals and
23 individuals with groups.

24 Q And is that part of the study of sociology?

25 A Yes, definitely.

1 by reject.

2 Q You use the words explicit rejection in your
3 declaration here, can you tell me do mainstream
4 Protestant Churches reject Hinduism -- Let's just
5 start with that. Do they reject Hinduism?

6 A They would reject Hinduism theologically, yes, as not
7 being consonant with Christian orthodoxy.

8 Q And they would explicitly reject it; is that right?

9 A Yes.

10 Q And they would also explicitly reject Islam, is that
11 right, Muslim?

12 A Yes.

13 Q And prior to at least Vatican II, the Catholic Church
14 would explicitly reject a number of American Protestant
15 churches; is that correct?

16 A Again, that's a complicated issue, but essentially in
17 the narrow sense prior to Vatican II, there would be a
18 form of rejection.

19 Q And Vatican II occurred in approximately 1962; is that
20 right?

21 A Yes.

22 Q Is it true that there's certain churches that you don't
23 think very highly of?

24 MS. KONAT: Objection, vague.

25 A Highly of in the sense of what, doctrine?

1 Q (By Mr. Rohan) Start with that, doctrine.

2 A I'm speaking now not as a sociologist but as a person
3 of faith, yes, I have certain convictions with regard
4 to matters of theological truth, certainly.

5 Q Now, you mention here this attitude, this is the fourth
6 line down in No. 1, "This is related to an attitude of
7 elitism and triumphalism on the part of some members".
8 Can you tell me which members you're referring to
9 there?

10 A Again, I can't give you a statistical breakdown here,
11 but obviously I'm not familiar with each and every
12 member of Community Chapel, and my guess is that those
13 who were newly associated with the church may not have
14 assumed this particular posture of elitism, early on at
15 least, and so I'm making a statement that would not say
16 every single person in the church feels this way
17 because I have no evidence to that effect. I'm making
18 the statement based on my inclusions after the
19 interviews with the persons indicated and their
20 knowledge of the congregation.

21 (Short break taken.)

22 A You'd asked concerning the individuals that I may have
23 spoken with in the last three years who were former
24 members of the Chapel, and there was another name that
25 occurred to me, Rosemary Tyksinski, it's

1 communicated that you were less than spiritual if you
2 didn't do this, and so it was not a matter of asking
3 but a matter of communicating a particular agenda,
4 spiritual agenda with which this man was uncomfortable,
5 as were other people. And it was in that sense that he
6 resisted what he saw as a subtle use of spiritual
7 intimidation and he felt as if he was being judged a
8 second-class Christian or a second-class citizen of
9 that church if he did not, quote, release his wife unto
10 the Lord.

11 Q Do you know how many people at Community Chapel
12 resisted the subtle influences regarding that
13 particular area?

14 A I can't give you a number, no, I don't know. I suspect
15 at least a handful but I can't give you specific data
16 on that.

17 Q It could be half or more; is that correct?

18 A I can't say yes to that because I don't know if it
19 would be that high.

20 Q You don't know one way or the other how high it is, do
21 you, sir?

22 A I don't have specific data, no.

23 Q And that's because the number of people you interviewed
24 before coming to the opinion that you have would be
25 less than two dozen; is that right?

1 A Yes, but let me add that those folks in talking with me
2 in a certain sense represented others that I did not
3 personally interview. In other words, they made
4 representations to me about the behaviors of
5 individuals that I was not able to personally
6 interview, and at one point I did talk or I did
7 interact, I should say, with probably at least two or
8 three dozen people at one group meeting. But to answer
9 your question basically, yes, I'm talking about less
10 than two dozen people that I specifically interviewed
11 in that regard.

12 Q And at this meeting where you had more people present,
13 is there any tape of that meeting of that session?

14 A It should exist. I believe I have it. I did look
15 for that and other tapes in the short time I had for
16 preparation and couldn't locate it but I did tape it
17 because I recall using a new mike that would pick up
18 voices in a large room like that, so that tape does
19 exist, and at least part of that discussion was
20 transcribed by one of my student assistants.

21 Q And have you been able to locate that transcription?

22 A Yes, I do have a copy of that, but as I think was
23 pointed out this morning by apparently counsel I didn't
24 send it or it was not received.

25 Q And does that identify who the people were that were

1 present at the taping session? That isn't the one you
2 gave me this morning, this one here, the one we copied?

3 A No, no, no because this involved, like I said, maybe 30
4 people, something like that, 25, 30 people. I don't
5 believe I identified names, no.

6 Q Did you ask each of those 30 people whether or not
7 they resisted or were not able to resist, whether they
8 resisted the subtle suggestions that they release their
9 mate?

10 A I don't recall. I certainly didn't ask every single
11 one of them there, no. I don't recall specifically how
12 much we discussed that aspect of their experience.

13 Q So, it could be, it's possible that the only people
14 that have had that experience were this one gentleman
15 you talked to or however many of these people told you
16 that they experienced that subtle manipulation; is that
17 correct?

18 A It could be but that's not my impression based on
19 conversation with these folks. My opinion is that
20 there were others that I did not interview who shared
21 those views.

22 Q And you had the opportunity to conduct a formal survey,
23 you could have asked all people the same questions or
24 you could have handed out a questionnaire to the
25 people, and while you were talking to them, they could

1 have filled it out, but you chose not to use this
2 methodology; is that correct?

3 A You're talking about these former members?

4 Q Yes, sir.

5 A Yes. I chose not to use survey, traditional survey
6 research; that's right.

7 Q Are self-descriptions that individuals give inherently
8 fallacious of their own experiences?

9 A I think sociologists would say that self-report,
10 self-descriptions, how can I put this, if they occur in
11 patterns, if there are repetitions to the reports of
12 behavior attitudes, experiences in one particular
13 group, in other words, if there is independent
14 verification of those self-reports, that lends
15 increased validity to what is being communicated.

16 If you're talking about just one particular
17 individual, unless the researcher is able to verify
18 every aspect of that self-report, of course, it's open
19 to the question. But sociologists work with groups of
20 respondents and very often they work with samples,
21 quote samples or random samples, so it's not unusual to
22 have what we call a small end or number of individuals,
23 and from that number you can extrapolate to the larger
24 population.

25 Q In your case, the number you chose was based on people

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A Yes.

Q The Shakers practiced as part of their liturgy and part of their religious training and beliefs and principles a form of dancing; is that right?

A Yes.

Q That dancing was where they put their hands on the shoulders of the person in front of them, actually touched the person in front of them and then they would do something akin to like the Bunny Hop?

A Exactly.

Q All right. And they did that as part of their worship services?

A I'm not sure the Shakers did it as part of their worship services, I'd have to check on that, because I have done quite a bit of reading on the Shakers, but if not part of their worship services, it was practiced by them in the context of their life together.

However, I need for the sake of the record and to explicate here, I'm very familiar with religious dance. I'm a sociologist in religion and for 20 years I have witnessed liturgical dance, I have witnessed dance in Pentacostal circles, and I can assure you that the dancing that I have personally witnessed at Community Chapel was very, very different from the liturgical dance, very, very different as I understand it from the

1 dancing performed by the Shakers or any other religious
2 group within Protestant, or for that matter, Catholic
3 circles.

4 The dancing which I witnessed and which has been
5 reported to me at Community Chapel did constitute at
6 the outset, as I understand it, the outset of this
7 emphasis, individuals, quote, dancing before the Lord
8 and doing a kind of quasi-liturgical single dancing.
9 But when I visited the sanctuary, I saw the closest
10 thing I can relate it to was very close ballroom
11 dancing, close intimate, I would use the word sensual,
12 I would use the word even sexual kind of dance. That
13 is very, very different from the kind of religious
14 ritualized dance that has been a part of the Christian
15 tradition. And I would think that any knowledgeable
16 person familiar with religious dance in the United
17 States would see a tremendous difference between the
18 kinds of phenomena practiced at Community Chapel and
19 that which would be part of liturgical or religious
20 dance in just about any other church you can think of
21 except perhaps very, very marginal extreme,
22 ultraextreme Pentacostal churches. The Community
23 Chapel dancing is in a totally different category.

24 Q But you say there are other extreme Pentacostal
25 churches that may have the same practices?

1 depicted not only Pastor Barnett but I believe other
2 people dancing without jackets. So, I would say I have
3 seen via video portrayals of people dancing without
4 jackets.

5 Q And do you recall whether they had ties on or not?

6 A I don't recall that.

7 Q Do you recall in general was it your opinion that
8 people were dressed the way people dress for church in
9 American Protestant churches for Sunday services?

10 A Generally. There's some regional variations. I would
11 think that with some exceptions, including the pastor's
12 wife as an exception, I would say that most appeared to
13 be conservatively dressed.

14 Q How was the pastor's wife dressed?

15 A Again, I'm relying primarily here on videotape that I
16 saw as well as descriptions of her attire by former
17 members, frequently short dresses, and I believe she,
18 it's either a wig or she has a lot of hair but her
19 hairdo or whatever you want to call it, coiffure,
20 probably is not typical of your typical Protestant
21 minister's wife. But generally speaking the people in
22 the congregation were conservatively dressed.

23 Q The next --

24 A May I add this? Not only did I see people dancing in a
25 ballroom kind of context but throughout the church

1 sanctuary and in the foyer and in various places within
2 the buildings I saw couples locked in very close tight
3 embraces, kissing, touching.

4 I fact, I remarked specifically about that to one
5 of the gentlemen I talked with after the service and I
6 remember telling him that I have never ever seen this
7 behavior and comportment in any other church that I
8 have visited in my life, and I have visited many, many
9 churches. So, I wanted the record to show that kind of
10 physical embrace not of just one or two people but of
11 many couples throughout the sanctuary was extremely
12 atypical and unusual.

13 Likewise, during the service, in fact during the
14 sermon, I distinctly remember one gentleman who was
15 seated in a pew in an aisle seat and he was sitting
16 next to a woman and during the sermon she had her hands
17 all over the back of his neck and his hair, was
18 essentially petting his neck. And then a woman came up
19 beside him, knelt on the floor, placed her head in his
20 lap, a woman on either side of him. I have no way of
21 knowing whether one of those women was his wife,
22 perhaps. My guess is that the other was a spiritual
23 connection. I would maintain and testify that that
24 kind of behavior in a public church service would be
25 extremely unusual in a normative Protestant

1 evangelical/fundamentalist church.

2 Q Let me ask you. None of this declaration nor -- Well,
3 let's say none of the declaration here that we see has
4 anything to do, except a couple of sentences you
5 pointed out at the end, regarding the children at
6 Community Chapel; is that right?

7 A Yes.

8 Q And in the articles that you've written about the
9 church and the books that you've referenced the church,
10 do you in any of those things reference any misconduct
11 of Chapel members towards children or what you
12 perceive as misconduct of Chapel members towards
13 children?

14 A To be absolutely certain, I would have to review my own
15 writing in Churches that Abuse, which I haven't done
16 in the last little while with regard to Community
17 Chapel. I don't believe I mentioned specifically
18 misconduct towards children. There is much that I did
19 not mention, obviously, because of time and space
20 constraints. I was aware of the role of children and
21 some of the problems and alluded to that I believe in
22 the draft of an article which I submitted as a news
23 analysis article to Christianity Today. So, I was
24 aware of that. Whether or not I specifically
25 referenced children in my writing, specifically the

1 book, I can't recall. I would have to check.

2 Q What do you recall that was -- Do you have that piece
3 with you today that you wrote for, was that
4 Christianity Today?

5 A Yeah, Christianity Today. I believe I have it. Yes.

6 Q What does that discuss about children and adults at
7 Community Chapel?

8 A I'll just briefly review it here. I do mention Janet
9 Cole and her five-year-old daughter Britany and the
10 events that eventuated the unfortunate death of her
11 daughter. All right, here's another reference to
12 children, referring here to a gentleman who I
13 interviewed. He said -- I'm referring to his
14 statement. His wife would spend hours dancing at the
15 church each week neglecting housework and the children.
16 Quote, "I would leave church early and take the kids
17 and she would stay at church until the early hours of
18 the morning", end of quote. His wife received
19 spiritual love letters and frequent phone calls from
20 her connection. The husband considered taking his own
21 life several times.

22 I don't think I mention in here, but Dr. David
23 Penner, clinical psychologist, whom I did interview and
24 he had counseled ex-members. Here I do get into it
25 with a quote from my article. Again, this was

1 submitted to the magazine and cut back because of
2 space. Penner and other professionals are seeing a
3 great deal of confusion in the lives of children whose
4 parents have been involved in spiritual connections.
5 Then I quote him, "The family boundaries are broken
6 down and there's mass confusion about who's responsible
7 for what in the family and whose affections are going
8 in what direction", end of quote. Officials at the
9 Puget Sound Holiness Academy, a Christian day school
10 where several children of Community Chapel members are
11 enrolled state that Chapel children are having
12 difficulty in school. Quote, "Families are being torn
13 apart by this", end quote says Jim Biswell. Quote,
14 "The parents don't know how to cope with the problem",
15 end quote.

16 Academy principal, Ron Profitt, observes that
17 students who grew up in Community Chapel are now
18 confused and some want nothing to do with Christianity
19 or religion. Similar sentiments were expressed by Ray
20 Ellis, who until recently was a vice principal at
21 Community Chapel's own Christian School. Quote, "There
22 are a handful of students who have totally embraced the
23 spiritual connection doctrine. There are others who
24 simply are not interested. Then there are those who
25 have seen their families devastated and who can't stand

1 what's going on. Some of the children are giving up on
2 Christianity", end of quote. Elis claims that several
3 senior boys have connections with older women in the
4 church. One high school girl reportedly has a
5 connection within an elder. Tuesday and Thursday
6 Chapel hours are set aside for dancing. I believe that
7 is the extent of my comment with regard to children but
8 let me check one other thing here.

9 For the sake of the record, this is not directly
10 related, but Dr. David Penner feels that until recently
11 the evangelical community didn't know much of what was
12 going on. Quote, "They are asking how can this really
13 be happening on so large a scale? The reaction is now
14 what can we do? We've never seen anything like this
15 before," end of quote. That's the extent of my
16 comment.

17 Q Did any of the parishioners you talked to at Community
18 Chapel mention any reports of children being molested,
19 either physically molested or sexually molested at
20 Community Chapel or by other parishioners at Community
21 Chapel?

22 A Yes, and I don't recall the time sequence here, but at
23 some point I was told in fact that there were
24 convictions of certain individuals associated with the
25 Chapel for child molestation and I assume that was

1 communicated to me after the convictions.

2 Q Other than that, did anybody else communicate any other
3 information to you about molestation, either physical
4 or sexual, of children by other parishioners at
5 Community Chapel?

6 A Depending on how one defines molestation. Let me just
7 use the word inappropriate behavior was reported to me
8 with regard vis-a-vis adults and some children, as I
9 alluded to here in the church Christian school, but to
10 the best of my knowledge, I'm thinking, I've looked at
11 so many different groups here. I know reports have
12 come from other churches but I believe in this case
13 these specific people that I talked with did not
14 reference molestation in their comments to me.

15 MR. ROHAN: We didn't give the doctor a
16 subpoena. Apparently this is the only expert we didn't
17 for his documents, but I'm serving a subpoena on him
18 now for them. Between today and tomorrow what I would
19 like to do is copy whatever documents we don't have,
20 for instance, the one he just read, that are in his
21 possession related to the deposition.

22 MR. STROM: Let me just say for the record,
23 insofar as he has material with him we will do that, we
24 have no objection.

25 MR. ROHAN: Thank you, I appreciate that.

1 THE WITNESS: And I have not relied on
2 anything else that I have not brought with me.

3 MR. ROHAN: I understand that. I think that
4 won't take very long. In fact, maybe when we take a
5 break, I could have my staff copy it and we can get it
6 back, that way we won't have to borrow it this evening
7 and you can have it this evening, if you wanted to
8 read it.

9 (Short break taken.)

10 Q (By Mr. Rohan) Doctor, during the deposition, were you
11 given an affidavit or declaration to sign involving
12 this case?

13 A Today, yes.

14 Q Can you tell me what it said? Can you tell me what
15 opinions you expressed in it? Are there any opinions
16 expressed in it that are not in this document that
17 we've been looking at which is Exhibit 121?

18 A I would say they are an elaboration on what we talked
19 about with a little more specific reference to
20 children.

21 Q What is it about children that's in this declaration,
22 the one you signed today? This is what we're looking
23 at here.

24 A Right. I was just wondering, I guess I don't have a
25 copy of it. As best as I recall, I spoke to the

1 environment at Community Chapel as being potentially
2 harmful to the psychological health and well-being of
3 children and the potential for sexual trauma in later
4 life or beyond the childhood years, and I mentioned
5 that because of the confusion that I just alluded to
6 actually in the statement by Dr. Penner in the
7 manuscript article I wrote for Christianity Today, the
8 moral confusion on the part of children seeing their
9 parents engaged in behaviors with spiritual connections
10 that they, the children, or at least the older children
11 knew to be at least different and perhaps wrong
12 vis-a-vis their prior training. They would see their
13 parents involved with other non-married adults, or
14 rather adults not married to their parents.

15 Some of them, it's been reported to me, were
16 confused by some of the physical activities that they
17 witnessed, and so I spoke to that with regard to the
18 environment and also the environmental isolation for
19 children being brought up in this kind of church,
20 again, related to what we mentioned for adults not
21 having an opportunity to really understand their
22 experiences in the context of reference to other
23 churches or religious organizations.

24 I made reference to the neglect of children,
25 neglect in the sense of not spending time with them

1 because of intense involvement in church activities.
2 As I recall, I mentioned that it was reported to me
3 that the children were unsupervised during some of the
4 dancing and other sessions at church. For long hours
5 at night after services, they were left essentially
6 unsupervised.

7 I talk about an environment which focuses on
8 sensual and overtly sexual behaviors and, again, how
9 this can impact the character development of children,
10 again, resulting in confusion, confused notions of
11 appropriate adult behavior. I mentioned the potential
12 impact of unsettled and constantly changing
13 environment, and by that I mean of the introduction of
14 new teachings, new revelations, new, quote, words from
15 the Lord, end quote, that this would create an unstable
16 environment that could cause children to be confused.

17 We were talking about an atmosphere that might be
18 conducive to moral schizophrenia where the rigid,
19 almost puritanical legalistic background of Community
20 Chapel, as I understand it, that kind of background has
21 gone through a sort of a flip flop and at least it
22 would appear that the church now seemingly condones
23 behavior or passively approves of behavior that once
24 was viewed as wrong, and I'm referring specifically to
25 overt sexual or sensual behaviors.

1 And also I believe I note that it's been reported
2 to me that leaders did nothing or little to correct or
3 to obstruct unhealthy behaviors. I'm not necessarily
4 when I say that, unhealthy behaviors, not necessarily
5 restricting it to children because, again, I heard very
6 little specific information about children but that
7 other kinds of behaviors were winked at or that the
8 leadership would look the other way. So, in brief,
9 that's the essence of what I communicated.

10 Q And you base this on the items, you base these opinions
11 in the declaration you signed today on the same
12 interviews and documents that you base your opinions in
13 Exhibit 121 on?

14 A Yes.

15 Q Any other additional information?

16 A No.

17 Q And when you talk about the environment at Community
18 Chapel as potentially harmful, was it the physical
19 health and well-being or psychological health and
20 well-being?

21 A Psychological.

22 Q Health and well-being of children and is that
23 determining whether something is harmful to the
24 psychological health and well-being of children, is
25 that within the realm of your specialization in the

1 area of sociology of religion or new religious
2 movements?

3 A Some of it could be and some of it would be in the
4 psychology of religion.

5 Q When you say could be, it means it may be in the
6 realm of sociology of religion and sociology of new
7 religious movements and may not be?

8 A Yes, because there's such overlap with these various
9 fields, psychology and sociology of religion.

10 Q Can you, based on this, predict if or do you in any way
11 know whether or not this environment at Community
12 Chapel was harmful to Briana Haviland?

13 A I can't speak to that because I do not know her or the
14 situation personally so I can't speak to that.

15 Q So, just knowing that she was there at Community Chapel
16 as a child from birth until she was eight or nine years
17 old wouldn't tell you whether or not she had been
18 harmed by being at Community Chapel, by this
19 environment that you talk about?

20 A Not specifically, no.

21 Q In fact, if I gave you the name of any specific child,
22 you couldn't tell me that; is that right?

23 A Not unless I was aware of it, no, unless I had specific
24 knowledge or someone had reported it to me.

25 Q And if someone reported to you specific knowledge about

1 during the time of change and the introduction of the
2 new teachings.

3 (Exhibit No. 122 marked for identification.)

4 Q Showing you what's been marked as Exhibit 122, is that
5 an article you wrote for Eternity Magazine on or about
6 October of 1986?

7 A Yes.

8 Q If you look at the fourth page of that article, there's
9 a sidebar that talks about Community Chapel, is that
10 correct, on the left-hand side?

11 A On the right-hand side, "Beyond the Fringe".

12 Q But I mean it's on the next page, I'm on the fourth
13 page.

14 A Oh, it continues, yes.

15 Q And if I can lean over and point to you, it says, "Then
16 in 1985", it says, "Don Barnett introduced his
17 controversial 'revelation teaching' concerning
18 'spiritual connections'". Does that refresh your
19 recollection as to when Don Barnett brought spiritual
20 connections or the church started teaching spiritual
21 connections?

22 A Yes, that was the information I had at the time that I
23 wrote this.

24 Q So, your opinion then would be that the moral
25 confusion, at least as to children, would involve

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Hon. Marsha Pechman
SJ Hearing 10/14/94 11:00 a.m.

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE
IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF KING

BRIANA HAVILAND, et al.,)
)
 Plaintiffs,)
)
 v.)
)
 COMMUNITY CHAPEL AND BIBLE)
 TRAINING CENTER, et al.,)
)
 Defendants.)

NO. 93-2-25996-4

DECLARATION OF KATHRYNE
HAVILAND IN OPPOSITION TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT

KATHRYNE HAVILAND declares:

1. I make this declaration from personal knowledge and I am competent to testify to the facts in this declaration.

2. I am the wife of William Haviland, and the mother of Danielle, Briana, Elissa and Tessa Haviland. I make this declaration to help the court understand the heartbreak and damage our family has endured over the last many years as a result of the negligence and intentional actions of the Community Chapel and Robert Mann.

3. Since Briana's molestation, rape and sodomy has become known to us, our family has been in turmoil and great distress. Knowing that this happened was horrible, but to know that it continued over several years is horrible beyond comprehension. For our family to know that she was stalked, raped, manipulated, thrown down and forced to have oral sex, starting when she was only four years old is beyond words.

DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 1

LAW OFFICES OF
JUDITH A. LONNQUIST P.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE WA 98101-3021
PHONE: (206) 622-2086 FAX: (206) 233-9165

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2 4. Because of the devastation, and the pain that Briana,
3 her sisters and us, her parents, shared, we went from an average
4 normal family to a family which is racked with pain beyond belief,
5 and into total HELL!

6 **Danielle Haviland.**

7 5. Danielle, my oldest daughter, reacted immediately with
8 disgust, unwillingness to talk about her feelings, denial and
9 resentment toward us for going to the church and toward Mann. She
10 cut her long blonde hair off and dyed it black because she didn't
11 want to be connected in anyway with Briana or family. She
12 starting running away for weeks at a time to the streets of
13 Seattle. She went from an average student to failing grades,
14 dropped all school activities.

15 6. Danielle became violent toward other family members and
16 we all have scars for her outbursts of anger and frustration.
17 Danielle has been aggressive with Briana, e.g. stepping on her
18 head, and throwing her into a fireplace corner. Danielle has been
19 aggressive with Elissa as well, e.g. pounding her head into a
20 wooden chair.

21 7. The situation escalated until Danielle became so
22 desperate she attempted suicide by slicing her wrists. Even after
23 starting therapy and trying various medications, she attempted
24 suicide again by taking a razor blade in the bath tub and slicing
25 every vein on her whole body. She was transported to Harborview
26 by ambulance. Seventeen days later she tried it again, and she
27 was almost died before she was found. Briana found her all three

28 **DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 2**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE: (206) 622-2086 FAX: (206) 233-9165
749 M

1
2 times and the other children saw it as well. Danielle was
3 hospitalized for 10 days in the Psychiatric Ward of the UW
4 Hospital. Despite being on medications and continuing in her
5 therapy, it is believed that she is at a high risk to attempt
6 suicide again.

7 **Briana Haviland**

8 8. Briana Haviland has attempted suicide through razors,
9 etc. seven times, and also is at a high risk of attempting again.
10 Her damages are not the subject of the summary judgment motion,
11 but she has been tremendously harmed by what was done to her and
12 to her family, and this has taken a toll on me and our whole
13 family.

14 **Elissa Haviland**

15 9. Elissa was a pretty happy child, but now her grades have
16 dropped, she is constantly stressed with stomach pains, head
17 aches, and is unhappy and cries a lot. She has extreme anger at
18 Robert Mann, and has shown destructive behavior including self-
19 mutilation on a continuous basis. She is both anorexic and
20 bulimic. She isolates herself from the family and others, and is
21 fearful a lot of the time.

22 **Tessa Haviland**

23 10. Before, Tess was a wonderfully happy, outgoing loving
24 child who thought each day was special. Now she is fearful, hides
25 behind chairs, in corners and behind my legs. She internalizes
26 her stress and suffers constant stomach aches and complains about
27 her eyes. She has white spots and a green aura around her hand

28 **DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 3**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9165



1
2 when she has migraines without the head pain. She is almost 10
3 years old now, but since Briana's situation started sucking her
4 thumb, drinks a bottle, and wets her bed occasionally. She has
5 extreme nightmares, and tries to sleep with me all the time. She
6 is very insecure and has to be touching me to make sure I'm there.

7 **Bill Haviland**

8 11. The stress and financial stress has put his job in
9 jeopardy as well as his health. Our financial situation is
10 desperate.

11 **Kathy Haviland**

12 12. I have suffered every day. I lost my job, which was a
13 necessary part of our income, because of the need to keep my
14 family together, and to prevent my children from destroying
15 themselves. We have spent thousands of dollars on therapy and
16 medications. I have suffered physically as well, being
17 hospitalized with a panic attack which completely immobilized me.

18 **Community Chapel's Control**

19 13. The Community Chapel is like no other church. Pastor
20 Don Barnett and his wife Barbara had total control over everyone,
21 and after years of constant reinforcing they had us believing
22 anything, "because it was from GOD!!

23 14. We were always exhorted from the pulpit by Don and
24 Barbara, the Elders, ministers, Bible College Teachers, Sunday
25 School teachers, and others, to TRUST THE PASTOR AND HIS WIFE. We
26 were specifically told to "sell out completely to this Pastor,
27 this church and this move of God". We were told that we must put

28 **DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 4**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9166



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2 our children in Sunday School, for there they would receive the
3 best care possible, looking after all their needs. All adults
4 were told to enroll in the Community Chapel Bible College and take
5 every Bible class available, and if we did not we would surely
6 perish. They insisted that we enter everything with an open
7 heart, without suspicion or hesitation.

8 15. We were exhorted to come to church at least one hour
9 early before the service, and stay after services as long as you
10 could to pray, which meant that your family was in church five or
11 six hours minimum on Friday, approximately six hours on Sunday
12 morning, and then again another six hours on Sunday evening, in
13 addition to prayer meetings, Bible classes and additional worship
14 services during the week.

15 16. We were exhorted from the pulpit that the media was
16 against us, that everyone was against us except the members of the
17 church", so don't have a television, don't read the newspapers,
18 don't be interviewed by anyone. We were told not to spend time
19 with relatives, friends or others who were not church members. We
20 were totally isolated and "protected" by the church. We were the
21 elite, we were the anointed ones, and we felt safe and secure
22 because of our special light.

23 **Disfellowshipping**

24 17. If you questioned the Pastor and his wife, you were
25 considered a dissident, you were "removed from the Body of Christ"
26 until you came into complete submission, and if you did not submit
27 you would be disfellowshipped. We were all frightened of that,

28 **DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 5**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
128 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE: (206) 622-2086 FAX: (206) 233-9165

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2 since we believed we would not be saved, demons would have access
3 to us, and we would fall. Others in the church could have nothing
4 to do with you ever again, including your immediate family.

5 **Secrecy**

6 18. The Pastor and the Elders did not allow any discussion
7 of any problems, so we had no way of knowing what was going on,
8 for years. The Pastor and the Elders wanted to know everything
9 about every member of the church, including every detail of your
10 marriage, family and private life. They had a complete card on
11 every member of the church, some with "red dots" indicating that
12 they were "problem people". But no one ever told us anything, even
13 when it involved sexual abuse of children at the Community Chapel
14 Christian School. It was a surprise to us when Barbara Barnett
15 told the congregation that Rick Cole, a Christian School teacher,
16 had been found to be sexually molesting a student, Seth Dalby.
17 Since leaving the church, I have learned that there were multiple
18 cases of sexual misconduct, by Elders, by members and by the
19 Pastor himself on many occasions.

20 19. I asked one of the Elders, Jeff McGregor about Robert
21 Mann, and he admitted to me that he recalled that there was some
22 problem with him. Then he later got amnesia, and could not recall
23 anything about Robert Mann.

24 **Spiritual Connections**

25 20. During the time of spiritual connections, the Church had
26 worship services from 5:00 pm to 1:00 am all week. Some of the
27 children were there the whole time - every night! Spiritual

28 **DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 6**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
128 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE: (206) 622-2086 FAX: (206) 233-9165

1 connections were encouraged to touch each other, gaze into each
2 others eyes, and spend extended periods of time together. Pastor
3 Don wanted everyone involved, and approved of connections between
4 adults and minors. Sunday School teachers would stress
5 "connecting in the spirit" and "dancing in the spirit". Dancing
6 in the spirit took place in the sanctuary and in other more
7 private rooms upstairs. Mann could have used connections to
8 manipulate Briana, as Mann told Briana he wanted to be her
9 spiritual connection.

10 I have read the foregoing declaration, know the contents
11 thereof, and believe the same to be true and correct.

12 SIGNED under penalty of perjury under the laws of the State
13 of Washington at _____, Washington, this ____ day of
14 _____, 1994.

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17 KATHRYNE HAVILAND
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28 **DECLARATION OF KATHRYNE HAVILAND IN
OPPOSITION TO DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 7**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9165

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Honorable Marsha Pechman
Room E-863

KING COUNTY
SUPERIOR COURT
SEATTLE, WA

IN THE SUPERIOR COURT OF WASHINGTON, KING COUNTY

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BRIANA HAVILAND, a minor, by)
CATHERINE CROWLEY, Ph.D.,)
her Guardian Ad Litem,)
Plaintiffs,)

No. 93-2-25996-4

vs.)

AFFIDAVIT OF LESLIE R. SHELBY

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT EUGENE)
MANNS a/k/a ROBERT GENE)
MANNS,)
Defendants.)

and)

KATHRYN HAVILAND and WILLIAM)
HAVILAND, husband and wife,)
and their marital community;)
DANIELLE HAVILAND, a minor;)
and ELISSA HAVILAND, a minor;)
and TESSA HAVILAND, a minor;)
Plaintiffs,)

vs.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and SHARON ALETA MANN,)
Defendants.)

UNDER PENALTY OF PERJURY, under the laws of the State of
Washington, I, Leslie R. Shelby, swear that the following is true
and correct:

1. I am a legal assistant at the Law Offices of Strong &
AFFIDAVIT OF LESLIE R. SHELBY - 1

ORIGINAL

STRONG & KYDD
1618 BANK OF CALIFORNIA BUILDING
900 - 4TH AVENUE
SEATTLE, WASHINGTON 98164
(206) 623-5221
FAX (206) 623-5214

104

1 Kydd. I have been employed by Strong & Kydd for 5 years.

2 2. I am one of the legal assistants assigned to the above-
3 referenced matter. I interviewed Aleta Marie Mann, by telephone
4 on October 28, 1994. In that interview, Ms. Mann told me the
5 following:

6 3. I was formerly married to Robert Eugene Mann, one of the
7 defendant's in this matter. Robert and I were married during the
8 time that he attended Community Chapel and Bible Training Center.

9 4. Robert Mann and I have two sons, ages 13 and 16. I have
10 custody of our sons and they reside with me, in Ohio.

11 5. I was a member of Community Chapel and Bible Training
12 Center from 1975 to 1977. I resumed attending Community Chapel
13 in 1979 and left the Chapel in 1986.

14 6. Both of my sons attended Community Chapel's Christian
15 school and Sunday school.

16 7. I separated from Robert Mann in July 1987 and filed for
17 divorce in February 1988.

18 8. During our marriage and separation Robert Mann
19 physically and mentally abused our children and mentally abused
20 me. I was so afraid of Robert Mann's abuse that I obtained a
21 restraining order against him during the pendency of our divorce.

22 9. The Kent office of Child Protective Services and the
23 Kent Police Department investigated allegations that Robert Mann
24 abuse our children and there are reports of this with these
25 agencies.

10. In late 1988, Robert Mann pled guilty to domestic

1 violence charges and was sentenced to six months probation.

2 11. As part of our dissolution proceedings, Robert Mann and
3 I attempted mediation.

4 12. Robert Mann's physical abuse of our children was at
5 issue in our dissolution and custody proceedings. An
6 investigation was conducted by Family Court Services.

7 13. In March of 1991, Robert Mann beat our sons violently.
8 He threw the boys into walls and banged their heads against the
9 floor. One of the boys was knocked unconscious by Robert.

10 14. Robert has raised bloody welts all over the boys'
11 bodies by beating them.

12 15. When my son Jesse was six years old, Robert held him
13 down and forced water down his throat, claiming that Jesse had
14 "demons."

15 16. On a few occasions, during our marriage, I was told by
16 neighbors that my sons were outside in the cold and rain while
17 Robert was inside the house with Sharon.

18 17. I once had to take the boys to stay at a friend's home
19 after a particularly severe beating from Robert. The boys
20 remained there for a short time before I brought them back home.
21 Robert did not seem to be aware that the children were not at
22 home.

23 18. During the time of our divorce proceedings, Sharon
24 Mann, Robert's current wife, and Robert tried to brainwash the
25 children and convince them that Robert never beat them.

19. Sharon Mann also forced my son Brian to write a letter

AFFIDAVIT OF LESLIE R. SHELBY - 3

STRONG & KYDD
1616 BANK OF CALIFORNIA BUILDING
900 - 4TH AVENUE
SEATTLE, WASHINGTON 98164
(206) 623-5221
FAX (206) 623-5214

1 saying that he lied about his father beating him and that he
2 wished to live with his father.

3 20. While a member of Community Chapel, I spoke with more
4 than one Church counselor on more than one occasion, regarding
5 Robert's physical abuse of our children.

6 21. I recall that one counselor I called regarding Robert's
7 physical abuse, said that he would talk to Robert about his
8 abusive behavior. However, to my knowledge no one talked with
9 Robert, or intervened on my behalf, regarding his abuse.

10 22. I was told, by the Church, not to go to CPS or any
11 other agencies outside of the Church.

12 23. I was also told to stay away from counselors or
13 therapists who were outside of the Church. The Church referred
14 to therapists outside of the Church as "New Age Movement"
15 counselors who do not believe in God and whose teaching was of
16 demons and I was told to stay away from them.

17 24. Our current visitation order provides that our sons
18 shall spend six weeks in the summer and every other Christmas and
19 spring break in Washington with their father. However, my sons
20 have refused to go and see Robert the last two summers because
21 they are afraid that he will make them remain in Washington with
22 him.

23 25. I do not want to believe that the man I was married to
24 would sexually abuse anyone, however, it would not surprise me to
25 discover that he had molested a child.

26. I have asked both of my sons whether they were sexually

1 abused and they have denied being sexually abused.

2 27. Robert Mann was subjected to a lot of abuse while
3 growing up. Robert was sexually abused as a child and I have
4 felt that he was strange in a way that I cannot describe.

5 28. My sons have told me that while staying with their
6 father they have awakened to find Sharon Mann in their bedrooms
7 very late at night.

8 29. Brian Mangley stated that Robert and Sharon Mann took
9 photographs of him in the nude supposedly to prove that there
10 were no bruises on his body. However, it was later discovered
11 that there wasn't any film in the camera.

12 30. Diana Schuler and Genie White, both members of
13 Community Chapel, have told me that Robert has raped Sharon Mann.

14 31. I recall allegations and suspicion that Sharon Mann
15 molested Genie White's son.

16 32. I believe that the atmosphere of Community Chapel was
17 conducive to predators against children. Church services were
18 very long and the children would become bored. Children were
19 often unsupervised and ran the Church grounds freely for several
20 hours.

21 33. I remember hearing allegations of sexual abuse by
22 Church members, then seeing those same members in Church. I felt
23 that Don and Barbara Barnett would certainly know if the
24 allegations were true. At that time, I believed wholly in Don
25 and Barbara Barnett, and believed that if anyone was guilty of
any type of sexual abuse, Don and Barbara Barnett would have

AFFIDAVIT OF LESLIE R. SHELBY - 5

1 disfellowshipped him or her. On more than one occasion, Don and
2 Barbara Barnett addressed the congregation saying only, "I'm sure
3 that you've heard of the situation with so and so." They did not
4 describe what happened or specify what the allegations were.

5 34. "Spiritual connection" relationships between children
6 and adults were not forbidden by the Church and I recall that
7 there were a lot of "spiritual connection" relationships between
8 children and adults. As I recall, the Church's only directive
9 regarding adult/child spiritual connections was to keep it in the
10 open. There were people cuddled-up in the hallways at the Chapel
11 all the time, and everyone, including children, witnessed
12 intimacy and cuddling between spiritual connection couples.

13 35. I was very uncomfortable with the spiritual connection
14 doctrine and I did not participate in spiritual connections.
15 I was uncomfortable with Robert leaving our home to go to Church
16 at 9:00 a.m. or earlier and not returning home until 2:00 a.m.
17 because he had been with his spiritual connections. Robert would
18 leave the sermon in Church to dance with his spiritual
19 connections for hours. Robert stayed home, with his family,
20 perhaps one night a week. Even during the nights that he was at
21 home, if the phone rang and it was Sharon, who was one of
22 Robert's spiritual connections at the time, he would get out of
23 bed and leave to go to her. Sharon would sit with Robert, me,
24 and our children during Church services, usually with her hand in
25 Robert's lap. I expressed my desire that Sharon not sit with my
family during Church. I believe someone in the Church spoke with

AFFIDAVIT OF LESLIE R. SHELBY - 6

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SEATTLE, WASHINGTON 98164
(206) 623-5221
FAX (206) 623-5214

1 Sharon and asked her not to sit with us during Church services.
2 Sharon then began sitting directly behind Robert and me during
3 services.

4 36. I went to see a Church counselor regarding my negative
5 feelings about spiritual connections. The counselor told me that
6 I had not experienced spiritual connections so I didn't know what
7 they were like or what they were about. The counselor's advice
8 to me was to "go with the flow."

9 37. Robert's current wife, Sharon, was his "main" or "big"
10 spiritual connection during the time that he and I were married.
11 Robert continually claimed that nothing sexual was going on
12 between he and Sharon. However, after I left Robert, and Sharon
13 moved into our former family home, Community Chapel members
14 remarked that at least Robert and Sharon could then be out in the
15 open.

16 38. Community Chapel exerted stringent control over its
17 members' lives. We were not allowed to watch or own a television
18 and were not allowed to go to movies. Women were taught to, and
19 were expected to, submit totally to their husbands. One sermon
20 referred to women as their husband's toolbox, the husband uses
21 what he needs from the toolbox, then puts it back and the toolbox
22 does not complain. I was cut-off by Church members and former
23 friends in the Church when I left my marriage to Robert Mann.

24 39. Everything in Community Chapel was secretive. During
25 the time that I was attending the Church, the members learned
that the Church was paying for abortions when the Church preached

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1 pro-life. The Church taught that Christ deceived, and I believe
2 that they taught this to justify its own deceptive behavior.
3 The Church counselors liked to keep things under wraps and not
4 tell Church members about things that were going on. At one
5 point, Robert Mann was in training to become a counselor. I did
6 not know this until I discovered his notes from classes or
7 training sessions for Church counselors. I recall thinking that
8 what he had in his notes was totally different from what was
9 preached from the pulpit.

10 40. Our entire lives were consumed by the Church, from
11 Bible College to services to expectations that members were not
12 to marry or have friends from outside of the Church. We partied
13 with Church friends and only had social contact with people who
14 were also Church members. Disfellowship from the Church was a
15 very harsh and frightening threat and that threat was enough to
16 maintain control over chapel members.

17 41. I recall one elder, who was either disfellowshipped or
18 left the Church, began to send letters to current members of the
19 Chapel saying that spiritual connections were not of God and
20 telling what the pastor and the Church were really up to. We
21 were told not to read any mail from dissenters of this sort. We
22 were told to have no contact with the sinners who were kicked
23 out. We were told not to read newspapers or open any mail from
24 those who were disfellowshipped.

25 42. The attitude and teachings of the Chapel were that
problems inside the Church stay inside the Church. The Church

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1 justified this teaching through the Bible. I disagreed strongly
2 that major things, such as child abuse and molestation should
3 stay inside the Church. The Church was wrong in teaching that
4 its members should not get help outside of the Church for major
5 incidents such as child abuse. Don and Barbara Barnett felt that
6 they were God and that the parishioners also looked upon them as
7 such.

8 43. Robert Mann is authoritative and overbearing. While we
9 were married, he insisted that there was a right way to do things
10 and that was his way. He often threw temper tantrums when he did
11 not get his way.

12 44. Robert was very controlling. He did not want me to
13 have any books or read any books from the public library. Robert
14 would become very angry with me whenever I took the boys to see
15 medical doctors. He wanted me to take the boys to see healing
16 ministers from the Chapel, only. Our son, Brian, had open heart
17 surgery in June of 1993. His condition was very serious and we
18 were unsure of whether or not he would survive the surgery.
19 Robert Mann did not come to see his son at all while he was in
20 the hospital.

21 45. Robert's voice would get falsetto when praying, he
22 would sway and cry, among other behaviors, while he was praying
23 in the Chapel. When Robert was "in the spirit," he would laugh
24 and giggle and skip in the Chapel. A friend, Jerry Brenstrom,
25 asked me if Robert was on drugs. More than one person asked me
if Robert Mann was gay, because of mannerisms like flipping his

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1 hand and the way he would flirt in a feminine manner. People
2 thought that Robert Mann was weird.

3 46. Robert Mann is a habitual liar, he would lie all the
4 time about anything and everything.

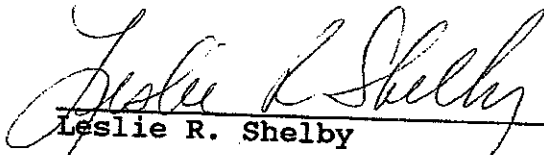
5 47. Robert had married Sharon Mann during one of our
6 custody actions and did not tell me, his attorney, or the Court
7 of his marriage. Instead, Robert told everyone that Sharon was
8 his girlfriend.

9 48. Robert believed that demons dwelt in people, and at one
10 point during our marriage, he accused me of "fucking" demons.

11 49. During the action for custody of our children,
12 psychological evaluations were conducted, including a Family
13 Court Services investigation, and a family psychological report
14 done by the University of Washington. Robert and Sharon Mann
15 participated in this psychological report. Also, during that
16 period of time, Robert took the kids to see Bruce Purvine, a
17 counselor or therapist at Catholic Community Services in Federal
18 Way.

19 50. I believe that Robert Mann has the money to hire an
20 attorney to represent him in this matter. I believe that he will
21 delay obtaining an attorney until the very last minute, then hire
22 an attorney in the eleventh hour in order to delay the action.
23 He used the same tactics during our Family Law court actions.

24 DATED this 22nd day of December, 1994.

25 

Leslie R. Shelby

AFFIDAVIT OF LESLIE R. SHELBY - 10

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900 - 4TH AVENUE
SEATTLE, WASHINGTON 98164
(206) 623-5221
FAX (206) 623-5214

automobile accident on the way to Spokane, they had discussions regarding Tom's insurance coverage. RP 165-6.

Polygraph tests were taken by Tom and Jennifer. Jennifer passed and Tom flunked. The defendant accompanied Tom to his polygraph test in Seattle. RP 154. The defendant, after hearing that Jennifer had passed the test, told Jean to "go ahead and report the abuse." RP 404-5. Jean testified this did not occur.

The defendant testified that the word of God reaches all issues in a person's life; child rearing, domestic life, emotional states, communication, finances, and employment. RP 346, 349-51. Any counseling given on these subjects is "real privileged." RP 348. The counseling and help provided to Jean and Jennifer was not mundane regardless of whether this occurred over the phone, in the hallway, or in his office. RP 420. He considered all of his conversations spiritual. RP 421.

Using the expertise given through the word of God the defendant could determine who was telling the truth about the victimization of a child. The defendant began to "reconcile" the Konopka family, "to find out what help they needed and to give them that help." RP 415.

In reviewing exhibits, the defendant identified a 1979 certificate which shows him to be "Ordained into the Ministry of the Gospel of Jesus Christ as a Senior Elder." RP 495. He identified a list of other persons within the ministry. While

identifying a list of Chapel leaders he stated, "Yes, if you went by that, that means we would have only one minister." The document was identified as a corporate Chapel generated document. RP 493-4.

Jean Harrington, who had worked for many years on staff at the Chapel, and had attended since Jennifer was four years old, identified herself as a minister of the gospel, and identified the defendant as a minister of the gospel, but not as the pastor. RP 223-25. She had never heard the defendant referred to as 'reverend,' and sought his help as a minister of the gospel not expecting confidentiality. RP 230-1.

Jean described "directives" given to her by the defendant as not always relating to spiritual matters. RP 250.

Jean made the distinction between a minister of the gospel and pastor at Community Chapel by saying, "a pastor is responsible for the congregation as a whole and as a shepherd and kind of leads the congregation in the direction of sermons and church order, services, as well as counseling. A counselor or elder is in subjection to the things that the pastor view, and Scott was not the pastor, and because I told I would say that truth, I cannot say he was my pastor when he is not, so Scott would be subject to the pastor. RP 237.

Jennifer had also never heard the defendant referred to as 'reverend.' RP 277.

The defendant was found guilty by jury of failing to report child abuse. In answer to a special interrogatory, the jury failed to find, by a preponderance of the evidence, that the defendant was a minister as defined in RCW 26.44.020(11).

1 Volume, 3 opp. total

03-07-98

KING COUNTY SUPERIOR COURT

PAGE 1

CASE#: 94-2-05356-6 SEA CIVIL JUDGMENT# NO
TITLE: HAVILAND ET AL VS COMMUNITY CHAPEL ET AL
FILED: 03-02-94
CAUSE: TTO TORT-OTHER
RESOLUTION: CONS DATE: 07-25-94 CONSOLIDATED CASE
COMPLETION: JODF DATE: 03-03-95 JUDGMENT/ORDER/DECREE FILED
CASE STATUS: CMPL DATE: 03-03-95 COMPLETED/RE-COMPLETED

ARCHIVED: 03-07-98

OFF-LINE DATE: 09-04-96

CONSOLIDATED: 93-2-25996-4

NOTE1: *CONSOLIDATED. DOCKET UNDER 93 2 25996 4.
NOTE2:

-----PARTIES-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
PLA01	HAVILAND, KATHRYNE			
PLA02	HAVILAND, WILLIAM			
MNR01	HAVILAND, DANIELLE			
MNR02	HAVILAND, ELISSA			
MNR03	HAVILAND, TESSA			
DEF01	COMMUNITY CHAPEL			
DEF02	BIBLE TRAINING CENTER			
DEF03	MANN, ROBERT			
DEF04	MANN, SHARON A			

-----ATTORNEYS-----

CONN	LAST NAME,	FIRST MI TITLE	LITIGANTS	DATE
ATP01	REED, RICHARD D			
ATD01	ROHAN, ROBERT JOSEPH			

-----APPEARANCE DOCKET-----

SUB#	DATE	CD/CONN	DESCRIPTION	SECONDARY
-	03-02-1994	\$FFR	FILING FEE RECEIVED LONQUIST, JUDITH A	110.00
1	03-02-1994	SMCMP	SUMMONS & COMPLAINT	
2	03-02-1994	*ORSCS	SET CASE SCHEDULE	
3	03-07-1994	AFSR	AFFIDAVIT OF SERVICE	08-28-1995ST
4	03-09-1994	NTAPR	NTC APPR FOR COMM CHAPEL & BIBLE TRAINING CNTR	
5	03-22-1994	ATD01 AN	ROHAN, ROBERT JOSEPH ANSWER COMM CHAPEL & BIBLE TRAINING	
6	04-01-1994	CSSRV	CONFIRM. SERV.:PARTIES TO BE SERVED	
7	04-06-1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
8	07-25-1994	CP	COPY/ORDER RE CONSOLIDATION ***** !!!DO NOT DOCKET UNDER THIS LINE!!! *****	

-----END COPY CASE-----

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KING COUNTY
SUPERIOR COURT
SEATTLE

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF KING

KATHRYNE L. HAVILAND and)
WILLIAM W. HAVILAND, husband)
and wife and their marital ;)
community; DANIELLE HAVILAND,)
ELISSA HAVILAND, and)
TESSA HAVILAND, minors,)

Plaintiffs,)

v.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and SHARON ALETA MANN,)
husband and wife and)
their marital community,)

Defendants.)

94-2-05356 6

No.

COMPLAINT FOR DAMAGES
AND OTHER RELIEF

COME NOW Plaintiffs and for causes of action against the
defendants allege as follows:

I. PARTIES AND JURISDICTION

1. Plaintiffs Kathrynne Haviland and William Haviland are husband and wife, residing in King County, Washington.
2. Plaintiffs Danielle Haviland, Elissa Haviland, and Tessa Haviland are minor children of Kathrynne Haviland and William Haviland, residing together with their parents in King County, Washington. The minor children are or will be represented by an appointed guardian ad litem in this matter. Briana Haviland is

COMPLAINT FOR DAMAGES
AND OTHER RELIEF - 1

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE, WA 98101-3028
PHONE (206) 622-2086 FAX (206) 233-9165

1 the daughter of Kathryne and William Haviland, and the sister of
2 Danielle, Elissa and Tessa Haviland, but she is not a party to
3 this action.

4 3. Defendant Community Chapel and Bible Training Center
5 ("Chapel") is a corporation, providing various kinds of religious
6 training and instruction at its principal facility in King County,
7 Washington. At all times material hereto, defendant Chapel
8 employed defendant Robert Mann as one of its instructors.

9 4. Defendants Robert Mann and Sharon Aleta Mann ("Mann") are
10 believed to be a marital community and at all times material
11 hereto resided in King County. All actions alleged against
12 defendant Robert Mann are also alleged as having been done on
13 behalf of the marital community.

14 5. The Court has jurisdiction of the parties and subject matter
15 of this action, and venue is properly in this Court.

16 II. FACT ALLEGATIONS

17 6. In 1977, Kathryne and William Haviland began attending
18 defendant Chapel, regularly brought their children Danielle,
19 Briana, Elissa and Tessa Haviland to the Chapel to participate in
20 the Chapel's services, and formed a special relationship with the
21 Chapel.

22 7. Defendant Chapel provided instructors and youth counselors,
23 educational materials and classrooms for the instruction of
24 children. Defendant Chapel strongly encouraged participation in
25 these educational programs.

26 8. Defendant Chapel had a duty to determine the qualifications,
27 and select, train, and supervise its instructors and youth
28

**COMPLAINT FOR DAMAGES
AND OTHER RELIEF - 2**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9165

1
2 counselors, and knew or reasonably should have known that parents
3 would rely on it to provide only persons who were suitable to
4 safely and properly care for and supervise young children.

5 9. Kathryne and William Haviland enrolled their minor children
6 in defendant Chapel's Sunday School programs, believing that to be
7 the mandate of defendant Chapel and further believing that the
8 minor children would be provided religious instruction as promised
9 and that the minor children would be safely cared for during the
10 time they were left with their Sunday School instructors or youth
11 counselors.

12 10. Defendant Chapel selected defendant Mann and engaged his
13 services to be an Sunday school instructor or youth counselor, and
14 determined that he was qualified to carry out the work, and
15 entrusted him with the responsibility for a group of children.

16 11. Between 1982 and 1986, Briana Haviland attended Sunday School
17 classes instructed by defendant Mann. Defendant Mann sought out
18 and followed, and repeatedly sexually abused and assaulted Briana
19 Haviland.

20 12. Briana Haviland repressed these attacks and was not able to
21 tell her parents of the attacks.

22 13. The Haviland family left the Chapel in 1989.

23 14. In 1992, Briana Haviland began recalling what defendant Mann
24 had done to her. As a result, she required and continues to
25 require substantial medical care and intervention, and has
26 suffered severe physical and emotional distress, and is believed
27 to be permanently disabled. Briana Haviland, by her Guardian ad
28 litem Catherine Crowley, has instituted a civil lawsuit in King

**COMPLAINT FOR DAMAGES
AND OTHER RELIEF - 3**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9165

1 County Superior Court, Cause No. 93-1-25996-4 against these same
2 defendants for her injuries and damages.

3 15. As the direct or indirect consequence of the actions and
4 omissions of these defendants, plaintiffs William Haviland and
5 Kathryne Haviland, and their minor children Danielle, Elissa and
6 Tessa have also suffered injuries and damages of a severe and
7 lasting nature.

8
9 **III. FIRST CAUSE OF ACTION**

10 16. Paragraphs 1-15 are re-alleged.

11 17. Defendants tortiously injured the parent-child relationship
12 in violation of RCW 4.24.010.

13 18. Plaintiffs are entitled to special and general damages for
14 said injury.

15 **IV. SECOND CAUSE OF ACTION**

16 19. Paragraphs 1-15 are re-alleged.

17 20. Defendant Chapel negligently selected defendant Mann for
18 employment, causing injuries to plaintiffs.

19 21. Plaintiffs are entitled to special and general damages for
20 said injuries.

21 **V. THIRD CAUSE OF ACTION**

22 22. Paragraphs 1-15 are re-alleged.

23 23. Defendant Chapel negligently trained defendant Mann for his
24 employment, causing injuries to plaintiffs.

25 24. Plaintiffs are entitled to special and general damages for
26 said injuries.

27 **VI. FOURTH CAUSE OF ACTION**

28 25. Paragraphs 1-15 are re-alleged.

**COMPLAINT FOR DAMAGES
AND OTHER RELIEF - 4**

LAW OFFICES OF
JUDITH A LONNQUIST, P.S.
1500 SEATTLE TOWER
1218 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9165

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2 26. Defendant Chapel negligently supervised defendant Mann during
3 his employment, causing injuries to plaintiffs.

4 27. Plaintiffs are entitled to special and general damages for
5 said injuries.

6 VII. FIFTH CAUSE OF ACTION

7 28. Paragraphs 1-15 are re-alleged.

8 29. Defendant Chapel negligently retained defendant Mann in his
9 employment, causing injuries to plaintiffs.

10 30. Plaintiffs are entitled to special and general damages for
11 said injuries.

12 VIII. SIXTH CAUSE OF ACTION

13 31. Paragraphs 1-15 are re-alleged.

14 32. Defendant Chapel breached its fiduciary duty owed to
15 plaintiffs as members of the Chapel and as participants in the
16 course of religious instruction required by the Chapel as a
17 condition of membership, causing injuries to plaintiffs.

18 33. Plaintiffs are entitled to special and general damages for
19 said injuries.

20 IX. SEVENTH CAUSE OF ACTION

21 34. Paragraphs 1-15 are re-alleged.

22 35. Defendant Chapel negligently or intentionally misrepresented
23 that defendant Mann was qualified and adequately trained to safely
24 care for the children, when it knew or reasonably should have
25 known that defendant Mann would assault or abuse children, causing
26 injuries to plaintiffs.

27 36. Plaintiffs are entitled to special and general damages for
28 said injuries.

**COMPLAINT FOR DAMAGES
AND OTHER RELIEF - 5**

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.
1500 SEATTLE TOWER
1216 THIRD AVENUE
SEATTLE, WA 98101-3021
PHONE (206) 622-2086 FAX (206) 233-9165

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X. EIGHTH CAUSE OF ACTION

- 37. Paragraphs 1-15 are re-alleged.
- 38. Defendants negligently inflicted emotional distress upon plaintiffs, causing injuries to plaintiffs.
- 39. Plaintiffs are entitled to special and general damages for said injuries.

XI. NINTH CAUSE OF ACTION

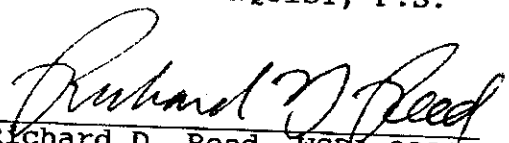
- 40. Paragraphs 1-15 are re-alleged.
- 41. Defendants conduct was intentional or reckless and so outrageous and extreme in degree as to be beyond all reasonable bounds of decency, and caused plaintiffs severe emotional distress and bodily harm.
- 42. Plaintiffs are entitled to special and general damages for said injuries.

XII. RELIEF REQUESTED

43. Wherefore, Plaintiffs request that the court find the defendants jointly and severally liable, and award special and general damages to plaintiffs as established herein, and issue appropriate injunctive relief, and award costs and attorneys fees as provided by law or equity, and grant such other and further relief as the court deems just and equitable.

DATED this 23 day of December, 1993.

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.


Richard D. Reed WSBA 9381
Attorney for Plaintiffs

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94-2-05356-6

FILED
JUL 25 1994
U.S. DISTRICT COURT
WEST WASHINGTON

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF KING

BRIANA HAVILAND, a minor, by)
CATHERINE CROWLEY, Ph.D, her)
Guardian Ad Litem,)

No. 93-2-25996-4

Plaintiffs,)

v.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and ALETA MANN, husband)
and wife and the marital)
community composed thereof,)

Defendants.)

and

KATHRYNE HAVILAND and WILLIAM)
HAVILAND, husband and wife,)
and their marital community;)
DANIELLE HAVILAND, a minor;)
ELISSA HAVILAND, a minor; and)
TESSA HAVILAND, a minor;)

No. 94-2-05356-6 ✓

Plaintiffs,)

v.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and SHARON ALETA MANN,)

ORDER CONSOLIDATING
CASES PURSUANT TO CR 42(a)

Defendants.)

THIS MATTER having come on before the undersigned upon the

EXPO1

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motion for consolidation of cases by Kathryn and William Haviland, and their children Danielle, Elissa and Tessa Haviland ("Haviland family"), and the court having reviewed the declaration in support of motion including the attached pleadings showing that there are two pending cases involving common issues of law and fact and related parties, and finding good cause for consolidation exists, now, therefore,

IT IS ORDERED AS FOLLOWS:

1. King County Cause No. 93-2-25996-4 and King County Cause No. 94-2-15996-4 are hereby consolidated.

2. The consolidation shall be of all issues in both cases, and shall be effective retroactively.

3. The cases shall be consolidated under Cause No. 93-2-25996-4, and the Order Setting Original Case Schedule in that cause shall apply.

4. A copy of this order shall be filed in King County Cause No. 94-2-05356-6.

JUL 25 1994

DONE IN OPEN COURT this ____ day of _____, 19__.

Heinz F. Duhon III

JUDGE/COURT COMMISSIONER
Heinz

Presented by:

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.

By *Richard D. Reed*

Richard D. Reed WSEA No. 9381
Attorney for Haviland Family

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Approved for Entry; Copy Received;
Notice of Presentation Waived:

ROHAN, GOLDFARB & SHAPIRO, P.S.

Robert J. Rohan by
BY *Richard J. Reed*
Robert J. Rohan WSBA 1744
Attorney for Community Chapel

by telephone permission 7/21/94 10:25 am
STRONG & KYDD

BY *Sidney J. Strong*
Sidney J. Strong WSBA 12260

ROBERT MANN

Robert Mann by
Defendant Pro Se *WSBA*
Richard J. Reed *9381*
by telephone permission
7/21/94 10:50 am

94 MAR 22 PM 3:59

CLERK
SUPERIOR COURT CLERK
SEATTLE, WA.

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SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF KING

KATHRYNE L. HAVILAND and)	
WILLIAM W. HAVILAND, husband)	NO. 94-2-05356-6
and wife and their marital)	
community; DANIELLE HAVILAND,)	ANSWER OF DEFENDANT COMMUNITY
ELISSA HAVILAND, and TESSA)	CHAPEL AND BIBLE TRAINING
HAVILAND, minors,)	CENTER
)	
Plaintiffs,)	
)	
v.)	
)	
COMMUNITY CHAPEL AND BIBLE)	
TRAINING CENTER; ROBERT MANN)	
and SHARON ALETA MANN, husband)	
and wife and their marital)	
community,)	
)	
Defendants.)	

Defendant Community Chapel and Bible Training Center ("Community Chapel") answers the plaintiffs' Complaint as follows:

ANSWER

1. Deny paragraph 1 for lack of knowledge.
2. Deny paragraph 2 for lack of knowledge.
3. In response to paragraph 3, admit that Community Chapel is a non-profit, religious corporation, which provides worship services and related religious activities in King County, Washington and deny the remainder.

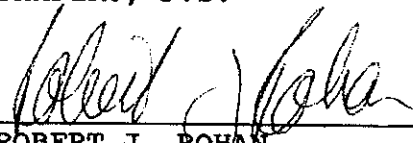
- 1 4. Deny paragraph 4 for lack of knowledge.
- 2 5. Admit paragraph 5 as to Community Chapel.
- 3 6. In response to paragraph 6, admit that at some times in
4 the past the plaintiffs did attend Community Chapel's services,
5 and deny the remainder for lack of knowledge.
- 6 7. In response to paragraph 7, state that Community Chapel
7 provided teachers, helpers, educational materials, and classrooms
8 for certain children and deny the remainder.
- 9 8. Deny paragraph 8.
- 10 9. Deny paragraph 9 for lack of knowledge.
- 11 10. Deny paragraph 10.
- 12 11. Deny paragraph 11 for lack of knowledge.
- 13 12. Deny paragraph 12 for lack of knowledge.
- 14 13. Deny paragraph 13 for lack of knowledge.
- 15 14. In response to paragraph 14, admit the third sentence
16 regarding Briana Haviland's instituting a lawsuit, and deny the
17 remainder for lack of knowledge.
- 18 15. Deny paragraph 15.
- 19 16. In response to paragraph 16, incorporate the above
20 responses.
- 21 17. Deny paragraph 17.
- 22 18. Deny paragraph 18.
- 23 19. In response to paragraph 19, incorporate the above
24 responses.
- 25 20. Deny paragraph 20.
- 26 21. Deny paragraph 21.

- 1 22. In response to paragraph 22, incorporate the above
2 responses.
- 3 23. Deny paragraph 23.
- 4 24. Deny paragraph 24.
- 5 25. In response to paragraph 25, incorporate the above
6 responses.
- 7 26. Deny paragraph 26.
- 8 27. Deny paragraph 27.
- 9 28. In response to paragraph 28, incorporate the above
10 responses.
- 11 29. Deny paragraph 29.
- 12 30. Deny paragraph 30.
- 13 31. In response to paragraph 31, incorporate the above
14 responses.
- 15 32. Deny paragraph 32.
- 16 33. Deny paragraph 33.
- 17 34. In response to paragraph 34, incorporate the above
18 responses.
- 19 35. Deny paragraph 35.
- 20 36. Deny paragraph 36.
- 21 37. In response to paragraph 37, incorporate the above
22 responses.
- 23 38. Deny paragraph 38.
- 24 39. Deny paragraph 39.
- 25 40. In response to paragraph 40, incorporate the above
26 responses.

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DATED this 22nd day of March, 1994.

ROHAN, GOLDFARB &
SHAPIRO, P.S.

By 
ROBERT J. ROHAN
WSBA #7744
Attorneys for Defendant
Community Chapel and Bible
Training Center

1002-001\A032294.RJR

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF KING

FILED

Plaintiff(s), 94 MAR -2 PM 12:30

NO 94-2-05356 6

vs.

[Handwritten signature]
Defendant(s)

ORDER SETTING ORIGINAL
CIVIL CASE SCHEDULE

I. BASIS

Pursuant to LR 4, IT IS ORDERED that the parties shall comply with the following schedule:

II. SCHEDULE

CASE EVENTS

DUE DATE

Filed.....	Wed	3/02/94
*Confirmation of Service (KCLR 4.2).....	Wed	3/30/94
*Deadline for Filing Statement of Arbitrability.....	Wed	8/10/94
(KCLR 16.1(f); KCLMAR 2.1 (a))		
*Confirmation of Joinder of Parties, Claims and Defenses....	Wed	8/10/94
(KCLR 16.1)		
NOTE: If no "Joinder" document is filed, parties are required to appear at the Status Conference		
Status Conference (if needed) (KCLR 16.1).....	Wed	8/24/94
Disclosure of Possible Primary Witnesses (KCLR 26).....	Mon	3/27/95
Disclosure of Possible Rebuttal Witnesses (KCLR 26).....	Mon	5/08/95
*Deadline for Filing Jury Demand (KCLR 38(b)(2)).....	Mon	5/22/95
Final Date to Change Trial (KCLR 40(e)(2)).....	Mon	5/22/95
Discovery Cutoff (KCLR 37(g)).....	Mon	7/10/95
Exchange of Witness and Exhibit Lists and Documentary.....	Mon	8/07/95
Exhibits (KCLR 16)		
Deadline for Hearing Dispositive Pretrial Motions (KCLR 56)	Mon	8/14/95
*Joint Statement of Evidence (KCLR 16).....	Mon	8/21/95
Pretrial Conference (KCLR 16).....	Mon	8/21/95
NOTE: Only for cases assigned to Individual Calendar Judge Trial (KCLR 40).....	Mon	8/28/95

* Requires the filing of a document with the Clerk

III. ORDER

It is ORDERED that all parties shall comply with the foregoing schedule and that sanctions, including but not limited to those set forth in Rule 37 of the Superior Court Civil Rules, may be imposed for noncompliance. It is FURTHER ORDERED that the party filing this action must serve this order setting case schedule on all other parties.

DATED: 3/02/94

[Handwritten signature]

JUDGE

(IMPORTANT: See Notices on Back)

I understand that a copy of this document must be given to all parties:

(Signature)

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FILED
94 MAR -2 PM 12:30
SUPERIOR COURT
SEATTLE, WASH.

IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR THE COUNTY OF KING

KATHRYNE HAVILAND and WILLIAM)
HAVILAND, husband and wife,)
and their marital community;)
DANIELLE HAVILAND, a minor;)
ELISSA HAVILAND, a minor; and)
TESSA HAVILAND, a minor;)

Plaintiffs,)

v.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and SHARON ALETA MANN, husband)
and wife and their marital)
community,)

Defendants.)

94-2-05356 6

No.

SUMMONS (20 DAYS)

TO THE DEFENDANTS: A lawsuit has been started against you in the above-entitled court by Kathryne Haviland and William Haviland, Danielle Haviland, Elissa Haviland, and Tessa Haviland, plaintiffs. Plaintiffs' claims are stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where plaintiffs are entitled to what they ask for because you have not responded. If you serve



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a notice of appearance on the undersigned person, you are entitled to notice before a default judgment may be entered.

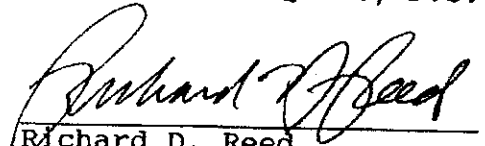
You may demand that the plaintiffs file this lawsuit with the court. If you do so, the demand must be in writing and must be served upon the person signing this summons. Within fourteen (14) days after you serve the demand, the plaintiffs must file this lawsuit with the court, or the service on you of this summons and complaint will be void.

If you wish to seek the advice of any attorney in this matter, you should do so promptly so that your written response, if any, may be served on time.

This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of Washington.

DATED this 2nd day of March, 1994.

LAW OFFICES OF
JUDITH A. LONNQUIST, P.S.


Richard D. Reed
WSBA NO. 9381
Attorneys for Plaintiffs