

FILE STAMPED
KING COUNTY, WASHINGTON
APRIL 26 1991
SUPERIOR COURT CLERK

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

DONALD L. BARNETT)	
)	
Plaintiff,)	NO. 88-2-04148-2
v.)	
)	
JACK A. HICKS, JACK H.)	DECLARATION OF
DuBOIS and E. SCOTT HARTLEY,)	BEVERLY ANN MOORE
individually and as the)	
Board of Directors of)	
COMMUNITY CHAPEL AND BIBLE)	
TRAINING CENTER,)	
)	
Defendants.)	
_____)	

I declare at Seattle, Washington
on the below date, under the
penalty of perjury, under the
laws of the State of Washington
that the statements herein are
true and correct.

(Signature)

Beverly Ann Moore

11/17/88

In June and July of 1987 Scott Hartley began to counsel me. We had experienced a connection in church that weekend and I needed a counselor so I decided to see him. I had such a deep love for Jesus and the emotions were very intense and Scott was there to help me understand this love. Below are listed the times I was with Scott being counseled and the type of counsel I received:

1) First time Scott came to my house to talk to me – he laid right down on the couch and pulled me next to him and said “you can come on stronger than this; open up.” (June Approx.)

2) Second time he came over he hugged and kissed me and held me and felt me and got sexually aroused. He pressed himself against me to where he would get a release sexually. He pushed my head down toward his penis

to give him oral sex.
I wouldn't do it but he
was all over me anyway.
He felt my breasts and vagina
(inside my blouse and down my
pants.) That night he had
2 sexual releases and said
that was unusual. He said
he felt so relaxed after wards
and went home. I felt horrible.
He was supposed to be counseling
me on how to love and open up
and be vulnerable in the Lord.
I felt overpowered, he was
forceful and rough and very insensitive.
He never said sorry or prayed.
During this encounter I was
afraid but tried to stay open-
stopped him twice- at least-
and wanted to talk about what
was going on and he would then
use his control and intimidation to
make me feel like "I worry too
much" or "whats wrong" or
"this is not adultery" (Some of
his statements).

This was the worst time with him. He said my love was good and I needed to be loved very intensely by someone with very intense love too, someone who would not hurt me – such as “himself”. I really tried to submit to him – he was an elder and my counselor.

3) Another time we were together in the chapel – supposed to be praying and worshipping – but he took me to a private room and began laying all over me – hugging hard and kissing and lifting up my blouse and kissing my breasts and feeling my bottom and vagina. That lasted 10 min. or so then he got up and said “I have to go now”. I received no counsel.

4) I went to his house once and He then pulled me down on his couch and we laid there together.

I went over there to get help –
so when I laid down – I
wouldn't talk. I was depressed-
well he didn't talk either –just
fell asleep. Then again- no counsel.
This was probably into July
by now.

5) I was with him at a fellowship
once and I was under a lot of
pressure at the time and needed him
to care for me; but instead a
pretty girl – new in our church—
walked by and he began to completely
ignore me and “counsel” her. I
sat with him and listened because
when I talked he said “she
needs to talk – be quiet”
First he intimidated her by telling
her she had all sorts of demons
that he could see and kept her in
a state of submission and fear –
He was an elder – so she (and I)
listened to him. A little later
he was hugging her and she was on

his lap and they were very close.

That seems to be his counsel

The other thing that bothered

me is when I was needy

for help – real help and counsel

he never would help or be there

with anything but physical

contact. In church he only

worshiped with me once –

I never could be with him

to worship because he was too

busy with several other women

in church sitting real close and

hugging and talking.

I am still very scarred from

Scott and suffer from condemnation

and mistrust in men. I felt

used and abused mentally and spiritually

by Scott. I felt bad and dirty.

I am now isolated from any

church with a big fear and hatred

for men.

(Signed)

Beverly Ann Moore

11/17/88