

1 (c) Identify all documents referring or relating to your
2 allegations.

3 ANSWER:

4 a. It is common knowledge that Community had several
5 people on the staff who they knew to be child molesters and/or
6 abusers; yet they were kept on staff. Others covered up these
7 facts. For example:

8 Rick and Jan Cole - Rick molested Seth Dalby while Rick was
9 a Youth Group leader. Rick was also a Christian School teacher.
10 He was convicted and sent to Monroe for 2 years. Jan Cole killed
11 her daughter, Brittany, when she discovered Rick was homosexual
12 and a child molester. Jan was found guilty and sent to a
13 psychiatric hospital in Maryland. Jan worked in publications and
14 other areas of the church.

15 Tom and Jeannie Konopka - Tom was Dorm Head leader and
16 usher. He was also an outside security officer and may have been
17 a Sunday School teacher. Tom was found guilty of molesting his
18 step daughter Jennifer and was sent to prison. Jeannie was a
19 Christian school teacher.

20 E. Scott Hartley (Elder) had to go to court on the Konopka
21 case because he refused to disclose Tom's sexual deviancy.
22 Hartley was the principal of Christian school and held many
23 positions through the years. He was second in command to Donald
24 Barnett, Pastor.

25 Ralph Elskog (Elder) - Sandy Erlick brought an action against
him for taking advantage of her and his abuse of his leadership
role to molest her. Elskog was also a minister, finance director
and was high up in leadership.

David Motherwell (Elder) - It is believed that Motherwell
was involved with the Konopka case and was forced to be held
accountable by the court. Motherwell was also an minister and
held many leadership roles.

Jack McDonald - (pastor of Tacoma Community Chapel -
satellite church) - found guilty of some charges.

Mike Teel - Sunday School teacher - admitted to Kathryne
Haviland that he was homosexual. He took three of the Haviland
children and took of his pants and laid down in broad daylight
with just his underpants. When Kathy's children told her, she
called the Chapel and spoke with John Bergan (a counselor).

DEFENDANT'S FIRST INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO PLAINTIFF AND RESPONSES THERETO-20

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(206) 623-5221
FAX (206) 623-5214

1 Bergan said he'd deal with it "in house". Bergan removed Teel
2 from the Sunday school, but Teel remained with the church.

3 Sandy and Lyle Brown v. Don Barnett - Don Barnett was the
4 pastor of CCBTC. Barbara Barnett told the congregation that Don
5 Barnett (her husband) had exposed himself in the hallway of a
6 motel in Las Vegas.

7 Barbara Barnett was observed going to bed with Jerry Zwack
8 at Barnett's father in law's house the night Zwack's wife died.
9 Jerry was appointed head of the Counseling Dept. by Barbara
10 Barnett. He was in the lead position at that time.

11 Jack Benson was an usher at CCBTC. He was charged with
12 sexually abusing his daughter and was put out by the church, only
13 to be reinstated.

14 Jim Hutchinson was pastor of a satellite church. He was
15 brought up on a morals charge. Was put out of church and then
16 reinstated.

17 Mike Menory went to prison for putting several Seattle
18 Police Dept. officers in the hospital when they tried to arrest
19 him for domestic violence. Menory has been in and out of prison
20 and is still allowed to be in CCBTC.

21 Jacquan Bailey is a practicing transvestite who has never
22 been disfellowshipped.

23 Gary and Lola Rurre said they left the church because Don
24 Barnett molested their daughter.

25 Robert Martinez was an usher at CCBTC. He went to jail for
domestic violence. Don Barnett did not disfellowship him. He
came back to CCBTC after completing his sentence.

b. Members of the CCBTC congregation, too numerous to
mention, have knowledge regarding these facts. Additionally, the
following members of the CCBTC security force have knowledge:

Wayne Snoey - head of security. Now lives in Kent and works
as a realtor for Windemere. He knew of all of the misconduct in
the church and maintained files.

Loren Krenelka - (206) 785-4925 (Centralia WA) Was Wayne's
right hand man and knows as much as Wayne.

Don Pack - Spokane WA

Steve Guer - Tukwila Police Dept.

DEFENDANT'S FIRST INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO PLAINTIFF AND RESPONSES THERETO-21

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Chuck Kerr- Goldendale Police Dept.

Don Pfaff - 3500 Greenland Ave., Anchorage AK.

Tony Tamascio - Burien WA - In charge of all firearms training for the security staff.

Darrell Russell - Washington State Patrol. Provided police training for chapel

Don Weikart - Normandy Park Police Dept.

Joe Bloom - Alaska

Joel Vasy

James Davies

Jim Buxton

Don Davis

Bill Adams

Norman Fishler - 35128 SE 257th, Ravensdale WA 98051. Helped with the police training and mock drills.

Chris Matthews - Mr. Matthews was an usher, Bible College teacher. Mr. Matthews supposedly broke into the church and shredded CCBTC files. He too was on the security force. He attempted armed robbery of a cocktail lounge.

Ron Gerrard (Illinois).

Due to the fact that the above were at the least on the security staff of CCBTC, information pertaining to their present addresses is within the custody and control of defendant.

c. Some of the documents are a matter of public record if a case or charges have been filed; any and all other documents are in the custody and control of CCBTC.

INTERROGATORY NO. 22: As to the allegations of paragraph 20 of your Complaint for Personal Injuries, please state:

(a) Each fact supporting your allegations;



OFFICE OF THE
ATTORNEY GENERAL

Suite 1212
June 13, 1986

Community Chapel and Bible
Training Center
18635 8th Avenue South
Seattle, WA 98148

Dear Reverend Barnett:

We are writing this letter to express our concerns about the possible involvement of children in sexually inappropriate behavior with adult members of your church. It is not our intention to interfere with legitimate religious practices. However, there are circumstances defined by our state's laws when certain acts become criminal in nature and/or constitute child abuse or neglect. Whenever such circumstances occur, our agencies are required to be informed and are authorized to take appropriate action for the protection of the child.

RCW 26.44.020(12) defines child abuse or neglect as:

. . . the injury, sexual abuse, sexual exploitation or negligent treatment or maltreatment of a child by any person under circumstances which indicate that the child's health, welfare and safety is harmed thereby.

Our State law, RCW 26.44, also requires certain persons to report within 48 hours any incidences of child abuse or neglect. These mandated reporters include professional school personnel, practitioners, social workers and psychologists. Reports must be made to the proper law enforcement agency or to the Department of Social and Health Services. Failure to report by a person required to do so can subject the person to criminal charges.

In addition, there are several laws which define acts constituting crimes. For example, RCW 9A.44.100 provides:

EXHIBIT D

page 1 of 2

Ken Eikenberry Attorney General
Dexter Horton Building, Seattle, Washington 98104-1749

100515

ICE OF THE ATTORNEY GENERAL

Reverend Barnett
June 13, 1986

Page 2

- (1) A person is guilty of indecent liberties when he knowingly causes another person not his spouse to have sexual contact with him or another:
- (a) By forcible compulsion; or
 - (b) When the other person is less than fourteen years of age; or
 - (c) When the person is less than sixteen years of age and the perpetrator is more than forty-eight months older than the person and is in a position of authority over the person. . .

Indecent liberties is a class B felony. There are a wide range of other crimes regarding inappropriate sexual contact, including statutory rape and communication with a minor for immoral purposes.

As you know, our agencies have been investigating allegations of child sexual abuse involving members of the church. We do not believe that you would condone such behavior. Thus, we request your cooperation and assistance in our investigation. To this end, we wish to extend an invitation to you and other interested members of your congregation to meet with us to discuss our mutual concerns and answer any questions you may have. Please contact Noella Hashimoto or Alzada Dodge of the Attorney General's Office at 464-7045 to arrange for a convenient time and place to meet.

Sincerely,

Noella Hashimoto
NOELLA HASHIMOTO
Assistant Attorney General

WINIFRED WIATRAK
Center 4 Administration
Department of Social and
Health Services
Division of Children & Family
Services

REBECCA J. ROE
Senior Deputy Prosecuting Attorney
King County Prosecutor's Office

SGT. HOWARD REYNOLDS
King County Police Department

100516

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SUPERIOR COURT FOR THE STATE OF WASHINGTON

COUNTY OF KING

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

vs.) NO. 93-2-25996-4

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and ALETA MANN, husband and)
wife and the marital)
community comprised thereof,)
Defendants, etc.)

DEPOSITION UPON ORAL EXAMINATION OF

JOHN JENOTT

VOLUME I

9:20 a.m.

September 2, 1994

900 Fourth Avenue, Suite 1616

Seattle, Washington

Cheryl O'Haleck

Court Reporter

COPY

1 and leadership to becoming a department head.

2 Q. What years did you serve as a department head?

3 A. I can't remember. I can remember that I quit
4 being department head somewhere in late 1985 or early 1986.

5 Q. Was there a particular reason you quit that role?

6 A. To move to Twin Falls.

7 MS. KONAT: If we could go off the record for just
8 a minute.

9 (Marked Deposition Exhibit No. 1.)

10 Q. (By Ms. Konat) Mr. Jenott, I'm handing you what's
11 been marked Exhibit 1 to this deposition. Do you recognize
12 that document?

13 A. No.

14 Q. You see down here where it has your name as being
15 "Sunday School Instructional Department," kindergarten?

16 A. Yes.

17 Q. Is there any way of telling on this document what
18 the date is, do you know? I mean, it's not a trick
19 question. I don't see a date. I just wondered whether the
20 church had a way of indicating date that was somehow coded
21 into the document code. We do not.

22 A. Not to my knowledge, no.

23 Q. So the "R84" wouldn't mean 1984?

24 A. It possibly could, but I can't unequivocally say
25 that's what it means. It's totally an assumption, but it

1 Q. What sort of training did you do of the -- well,
2 before I get to that, you said you oversee personnel. Who
3 are the personnel?

4 A. When I say "personnel," I mean the adults who were
5 actually working with the children in the classroom.

6 Q. And did those adults have particular roles? I
7 know there were teachers, and you've mentioned helpers.
8 Are there any other roles?

9 A. They did have particular roles. There was what we
10 would call the head teacher. And it seems to me that we
11 would try to have under the head teacher what we would call
12 an assistant teacher. And under the assistant teacher we
13 would have several helpers. Usually, if I remember
14 correctly, we tried to have at least four adults for every
15 class. And this was rotated on a monthly basis so that the
16 teachers and their -- if you would want to call them the
17 staff that worked under the head teacher, would have a
18 month to teach and be involved in the classes and then a
19 month where they would not be doing that but would have a
20 break from that. And it would be a month on teaching and
21 then a month off on a rotating basis.

22 Q. You said you tried to have four adults for every
23 class. Were you able to do that most of the time?

24 A. Yes. When I said we tried, the class sizes would
25 vary. My involvement in the Sunday School spanned a long

1 enough time period that I saw classes grow. In the larger
2 classes, we would try to have at least one man and one
3 woman assistant and then the teacher and the assistant
4 teacher.

5 Q. Why would you try to have one man and one woman in
6 larger classes?

7 MR. ROHAN: Objection. I believe you
8 mischaracterized his testimony. It was one man and one
9 woman assistant.

10 A. I would be glad to answer the question about why
11 the different sexes.

12 During the course of the class time, it spanned a
13 period of hours. If I remember correctly, the teachers
14 would be in their classrooms around 9:00 in the morning.
15 And I think the children -- this is fairly unclear, so I
16 may be wrong. But I think that the children were allowed
17 to be able to be brought in and dropped off at the class
18 somewhere around 9:30. And then the actual services for
19 the adults or what we called the Sunday School for the
20 adults would start at 10:00. What we would have to do is
21 have the children under our supervision anywhere from 9:30
22 in the morning until perhaps 1:00 to 1:30 in the afternoon
23 at times, which for children is a long time. So it
24 necessitated trips to the bathroom, lunch breaks, activity
25 times.

1 time for, say, like a lunch period where everyone would get
2 out their lunches that they would bring and the parents
3 would send along with them. There would be exercise times
4 where the children could stretch and jump and do different
5 kinds of exercises. There would be more singing times.
6 There would be prayer times.

7 I think that's pretty much it. These different
8 things weren't always exactly the same for every class and
9 every age group. And as the church got older, the methods
10 and the timing changed. But I think that was pretty much
11 what the morning would be like.

12 Q. What age group were you the department head for?

13 A. At first I was a department head for what we
14 called the preschool department, which later split into the
15 preschool and kindergarten -- the preschool department
16 initially covered -- what we had was four age groups.
17 There was the P1 classes, the P2 classes, the K4 classes
18 and the K5 classes. P1 and P2 were preschool classes; in
19 other words, children that were too young to go into
20 kindergarten. And then the K4 and K5 classes were the
21 kindergarten-aged children.

22 So it was that age group that I worked with
23 initially. As the church got bigger and grew, we had to
24 split it. Because of the size and the amount of
25 responsibility, we split it. And I assumed the

1 responsibility for the kindergarten classes.

2 Q. The K4 and K5?

3 A. Right.

4 Q. For the kids in your department, and if we -- do
5 you have any idea when that split occurred?

6 A. I can't remember.

7 Q. Were the classes for P1, P2, K4 and K5
8 substantially similar in that they participated in the
9 activities that you listed?

10 A. Yes.

11 Q. How about if we make sort of a general statement
12 that says if I ask a question about the time when you were
13 a department head, if for some reason you treated them
14 differently you'll let me know. Otherwise we'll assume
15 that your answers go to all of those classes while you were
16 head of that department. And whenever the change occurred
17 it will go just toward the kindergarten.

18 A. Fine, yes.

19 Q. Was there also a nap period in the classes?

20 A. Yes.

21 Q. When the kids took breaks, like play time or
22 whatever breaks, stretching, things like that, where did
23 that take place?

24 A. In the winter when it was cold outside, it would
25 be inside the classroom. There was a covered area in the

1 MR. ROHAN: I think there is three of them.

2 MS: KONAT: -- the record, we should split it up
3 and mark it properly.

4 Q. (By Ms. Konat) Mr. Jenott, if I could have you
5 return that copy to the court reporter, and if I could get
6 copies we'll mark them and divide them up this one way. At
7 the bottom, page 100882 is Exhibit 3, just that page. Now,
8 if I could have the court reporter mark as the next page
9 Exhibit 4, through page 100885.

10 (Marked Deposition Exhibit No. 4.)

11 MS. KONAT: And the remaining pages, 100886
12 through 100891, will be Exhibit 5.

13 (Marked Deposition Exhibit No. 5.)

14 Q. (By Ms. Konat) So why don't we take for now
15 Exhibit 5. And if you could review that for me.

16 A. Okay.

17 Q. Are you familiar with that document? Have you
18 seen it before?

19 A. I'm sure I have seen it before. As far as being
20 familiar with it, I mean, I don't -- I can't recollect
21 everything that's contained in it. But yes, I'm sure I've
22 read it before.

23 Q. In fact, this document says, and it's difficult to
24 read, I understand that, it was written by you as a
25 preschool department head on April 10th of 1979 to Scott

1 Hartley from John Jenott, Preschool Department Head, and
2 the date up in the top right April 10, 1979.

3 A. I can't contest that.

4 Q. Does this help you in sort of figuring out how
5 long you were a department head? We had thought a couple
6 years, but -- and I just noticed this, as well, that it's
7 1979. So it seems like it might have been more than six or
8 at least six years.

9 A. Yes.

10 Q. Could it have been longer than that? Do you know
11 if you had been a department head for some time when you
12 wrote this memo?

13 A. I don't know. I can say I'm sure it wasn't -- I
14 didn't write it right after I became the department head.
15 So yeah, it would be fair to assume that I had been
16 department head for a while, whatever that means.

17 Q. I'm not very good with dates, either, so I don't
18 hold that against you at all.

19 Well, I would like to, since we're talking about
20 discipline, is jump ahead to the portion of your -- well,
21 I'm sorry. I'm jumping around here. Am I correct that
22 this is the general procedures and policies relating to the
23 preschool Sunday School department? And I'm reading the
24 "re" notation on this document.

25 A. Yes.

FILED

94 OCT -5 PM 2:59

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

SUPERIOR COURT
SEATTLE, WA

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

No. 93-2-25996-4

Plaintiffs,)

AFFIDAVIT OF
KATHRYN HAVILAND

vs.)

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

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, Kathryn Haviland, swear that the following is true
and correct:

AFFIDAVIT OF KATHRYN HAVILAND - 1
(October 3, 1994)

EXHIBIT A

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1. In 1977, my husband and I and our four daughters began attending Community Chapel and Bible Training Center. We regularly brought Briana and our other children with us to the Chapel to participate in the Chapel's services.

2. Briana Haviland, now 15 years old, was raped by her Community Chapel Sunday School teacher, Robert Mann, repeatedly between the ages of four through eight. Mann stalked Briana while at Community Chapel, as she moved around the grounds, and as she changed Sunday School classes. The rapes occurred on Community Chapel's property.

3. Briana repressed these attacks and was unable or unwilling to tell me or her father of the attacks.

4. Our family left the Chapel in 1989.

5. In 1992, Briana began recalling what Robert Mann had done to her. As a result, she required and continues to require substantial medical and psychological care and intervention and is believed to be permanently disabled.

6. Briana attended school and Sunday School at Community Chapel because that is what Community Chapel demanded. The church preached that it was the parents' "Christian duty," imposed by God, to place their children in Sunday School. This was not a rule imposed on our family alone, it was a church policy, commonly known and widely practiced by Community Chapel parishioners who had children. If parents chose not to send their kids to Sunday School, they would be ostracized and made to feel that they were failures as parents.

AFFIDAVIT OF KATHRYN HAVILAND - 2
(October 3, 1994)

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1 7. The Sunday School program was alleged by the church to
2 be a highly organized and safe place for children. Community
3 Chapel promised that there would be two or more adults teaching
4 Sunday School classes. Community Chapel led parishioners to
5 believe that the Sunday School teachers and helpers were trained,
6 and were supervised by the heads of the departments.

7 8. There was never any indication from the Chapel that our
8 children were in any way threatened while attending Sunday School
9 or Christian School.

10 9. Despite the church's promises, parishioners have since
11 found out that Sunday School classes were often taught by one
12 adult person, without helpers. Although Defendant professed to
13 have conducted background searches for personnel working with
14 children, no background searches were done. Defendant did not
15 require special qualifications or training for Sunday School
16 personnel, nor did they screen or supervise Sunday School
17 personnel.

18 10. We trusted the Chapel to provide a safe atmosphere and
19 qualified Sunday School teachers to teach our children.

20 11. Community Chapel gained the confidence and trust of the
21 parishioners through a combination of intense interaction between
22 the church and its parishioners, isolation from the outside
23 world, and control over the personal lives of its parishioners.
24 The church purported to act in the parishioners' best interests.

25 12. Defendant hired security officers and trained them to
handle and carry weapons in order to protect the parishioners

AFFIDAVIT OF KATHRYN HAVILAND - 3
(October 3, 1994)

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1 from outsiders, including parishioners who had been
2 disfellowshipped. Defendant convinced its parishioners that the
3 pastor and his wife spoke for God and were to be trusted and
4 followed without question. Defendant exhorted its parishioners
5 to sever ties with relatives, friends and others who were
6 outside of the church, including former members who had been
7 disfellowshipped. Parishioners were urged get other jobs if
8 their work limited their involvement in the Chapel.

9 13. We were not allowed to listen to non-Community Chapel
10 music, read newspapers, or watch television. From the pulpit,
11 Pastor Don Barnett would tell the parishioners that everyone,
12 including the media, was against us and spreading lies.

13 14. Community Chapel provided every source of information
14 to the parishioners. The church warned against looking to
15 outside sources for information or help. Parishioners were
16 threatened with disfellowship if they failed to heed the church's
17 warnings or questioned the church leadership. If you questioned
18 the pastor, his wife or Oversight, you were considered a
19 dissident and would be disfellowshipped.

20 15. The church withheld information from parishioners, even
21 when the members should have been informed. For instance, if
22 children complained of molestation, the church's response was to
23 exorcise or deliver the child. Often, the child's parents were
24 not even informed. There sometimes would be no repercussions
25 against the wrongdoer and he or she would often continue working
in the church with children.

AFFIDAVIT OF KATHRYN HAVILAND - 4
(October 3, 1994)

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16. The safe atmosphere Defendant promised to provide the parishioners' children was a farce. Children were often unsupervised, until midnight or later, while their parents were involved in church matters. Young children (4, 5, 6 years old), ran around until very late at night, totally unsupervised.

17. We were expected to entrust care of our children to other Chapel members without qualm. The Chapel instructed us that all the members were our Christian brothers and sisters and that we were all one big family.

18. If a member, or a Chapel Usher, saw a child misbehaving, it was expected that they would correct and/or discipline that child regardless of whose child it was.

19. The doctrine and practice of spiritual connections reinforced the instruction of the Chapel that we were all one big family.

20. We were taught by the Chapel that our spiritual connection partner was above our marriage partnership. Many, many members moved into the homes of their spiritual connections, sometimes bringing their own children with them. The children, of both families, were expected to accept these arrangements and to obey their parents' spiritual connection partners as if they were their own parents.

21. Just as we were indoctrinated to place our children in Sunday School, we were instructed to come to Chapel services no less than one-hour beforehand, in order to pray. We were also instructed to stay after services, sometimes for several hours,

AFFIDAVIT OF KATHRYN HAVILAND - 5
(October 3, 1994)

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to pray. There were many hours when parents would be engaged in dancing in the spirit with their spiritual connections. These activities of the parents made for a lot of free time for the children without supervision of any type.

22. I believe that sexual predators had ample opportunity to prey on children in the Chapel.

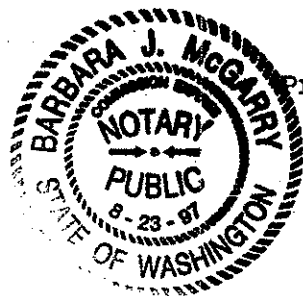
DATED this 3 day of October, 1994.

Kathryn Haviland
Kathryn Haviland

STATE OF WASHINGTON)
COUNTY OF KING) : ss.

On this day personally appeared before me Kathryn Haviland, to me known to be the individual described in and who executed the within and foregoing instrument, and acknowledged that she signed the same as her free and voluntary act and deed, for the uses and purposes therein mentioned.

GIVEN unto my hand and official seal this 3rd day of October, 1994.



Print Name: Barbara J. McGarry
NOTARY PUBLIC in and for the State of Washington, residing at Sea Hill.
My commission expires 8-23-97.

AFFIDAVIT OF KATHRYN HAVILAND - 6
(October 3, 1994)

STRONG & KYDD
1616 BANK OF CALIFORNIA BUILDING
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SEATTLE, WASHINGTON 98164
(206) 623-5221
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1
2
3 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON, KING COUNTY
4

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

No. 93-2-25996-4

AFFIDAVIT OF
ROSEMARY TYKSINSKI

8 vs.)

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

11 Defendants.)

12 and)
13)

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

17 Plaintiffs,)

18 vs.)

19 COMMUNITY Chapel AND BIBLE)
TRAINING CENTER; ROBERT MANN)
and SHARON ALETA MANN,)
20)

21 Defendants.)
22)

23 UNDER PENALTY OF PERJURY, under the laws of the State of
24 Washington, I, Rosemary Tyksinsky, swear that the following is
25

DECLARATION OF
ROSEMARY TYKSINSKI - 1

EXHIBIT B

page 1 of 8

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

true and correct:

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1. I am a former member of the Community Chapel and Bible Training Center. I attended Community Chapel from 1972, at age eighteen, until I left the Chapel in 1985. My husband and children are also former members of Community Chapel.

2. I am now in the last stages of attaining my doctorate degree in psychology.

3. I held the position of lay counselor for the Chapel from approximately 1976 until 1985.

4. Chapel counselors received no Church-based training in counseling and Church management strongly discouraged counselors from seeking training outside the Church. Church management also strongly discouraged counselors from reading professional psychology and counseling literature and materials. The fact that outside training and education was discouraged by the Church was made very clear to the counselors by sermons, announcements from the pulpit, and memoranda.

5. The criteria used to select counselors was whether the Church management liked the individual, felt the individual had common sense, was spiritual, and could "toe the party line." There was no screening of individuals selected as counselors, no assessments, and credentials were not necessary.

6. I do not recall any formal system of reporting that counselors were expected to follow when a serious problem, such as sexual assault or molestation, came to their attention. However, I do recall that I, as well as other counselors, took

DECLARATION OF
ROSEMARY TYKSINSKI - 2

1 the position very seriously and would take situations we did not
2 know how to handle to the Minister of Counseling, George Alberts,
3 or to the Pastor, Don Barnett, or his wife, Barbara Barnett.

4 7. As a counselor, I was never informed about outside
5 agencies, such as Child Protective Services, to whom incidences
6 of abuse should be reported. To the best of my recollection,
7 there may have been a memorandum addressed to the Church
8 counselors directing them not to report to outside agencies.

9 8. Community Chapel presented itself as a self-contained
10 community and either outright forbid or strongly discouraged,
11 under threat of disfellowship, its members from going to
12 outsiders. The members were told that everything that was needed
13 was provided by the Church, there was no need to go to outsiders,
14 that outsiders were not Godly and could not possibly help us.

15 9. If I, in my capacity as a Church counselor, was told of
16 any abuse, I would have reported it directly to the Minister of
17 Counseling, George Alberts, or to the Pastor, Don Barnett or his
18 wife, Barbara Barnett.

19 10. In my capacity as a counselor, one Church member told
20 me that she was battering a child in her care. I was distressed
21 by this and concerned for the safety of the child. I told George
22 Alberts about the abuse. Mr. Alberts instructed me not to tell
23 the child's parents. He further stated that the Church would
24 make it so the abuser could not watch children. To my knowledge,
25 the abuser was never confronted by the Church regarding her abuse
of the child. Some time later, I learned that the abuser was

DECLARATION OF
ROSEMARY TYKSINSKI - 3

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1 still babysitting the child. At that point, I informed the
2 parents about the abuse. The Church never intervened in the
3 situation.

4 11. On another occasion, Mrs. Cardwell came to me, in my
5 role as counselor, and told me that she feared for her life
6 because of the abuse and threats of her husband, Michael
7 Cardwell.

8 12. The babysitter of the Cardwell's son, Joshua, told me
9 that she suspected that Joshua was being sexually abused. She
10 related that Joshua was behaving oddly and that he feared going
11 home when his mother wasn't at home. I reported this information
12 to the Church, to either George Alberts, Don Barnett, or Barbara
13 Barnett. The Church management told me to advise Mrs. Cardwell
14 to lose weight and to make some new clothes. Nothing was done,
15 by the Church, other than this ridiculous advice which, needless
16 to say, I did not pass on to Mrs. Cardwell. Michael Cardwell was
17 later arrested and charged with child molestation.

18 13. In the 1970's I also served as a Sunday School teacher
19 at Community Chapel. Like the selection process for Church
20 counselors, there was no screening of Sunday School personnel.
21 There was no supervision of Sunday School classes or teachers.
22 Sunday School teachers could basically do whatever they wanted
23 with their class of children.

24 14. As a Sunday School teacher, I was often without helpers
25 or a second adult in the room, as were other teachers.

DECLARATION OF
ROSEMARY TYKSINSKI - 4

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1 15. Classes would often split-up with each teacher taking
2 the kids to do a different activity. Sunday School teachers were
3 often alone with their classes.

4 16. The Sunday School rooms had solid doors and no windows.

5 17. The practices and beliefs of the Church were such that
6 it was common to allow people you did not know, but who were
7 members of the Church, to care for your children.

8 18. Children were often unsupervised, until midnight or
9 later, while their parents were involved in spiritual
10 connections. Very young children (4, 5, 6 years of age), would
11 be running around until very late at night, totally unsupervised.

12 19. Adults encouraged their children to have spiritual
13 connections with adults. This involved touching of the body and
14 mouth-to-mouth kissing. I have witnessed adults having spiritual
15 connections with children and I believe that many children were
16 hurt at Church by these spiritual connections.

17 20. It is my opinion that Community Chapel was full of
18 pedophiles and that the atmosphere of the Chapel was one of free
19 and open access to children.

20 21. The atmosphere of the Chapel was also one where
21 victimizers would not be punished. In approximately 1982, the
22 Chapel introduced a new doctrine that said all those who did
23 wrong were possessed by a demon. In response to any problem or
24 abuse, the doctrine held that the person who was possessed by
25 demons, was not at fault and could not be held responsible for
their actions.

DECLARATION OF
ROSEMARY TYKSINSKI - 5

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1 22. I recall one member of the Chapel, Ms. Joe McCullough,
2 who suffered from Turner's Syndrome. Turner's Syndrome is a
3 malformation of reproductive organ's, which caused Ms. McCullough
4 to have masculine traits and appearance. The Chapel accused
5 Ms. McCullough of having demons of lesbianism. Ms. McCullough
6 went through terrible exorcisms at the direction of the Chapel.

7 23. Exorcisms consisted of hours of praying and rebuking,
8 often at the top of the lungs. At the completion of an exorcism,
9 it was expected that a manifestation of the demon would leave
10 you. In Ms. McCullough's case, obviously, no demons left her
11 body and she was eventually disfellowshipped.

12 24. On another occasion, Mr. Benson testified before the
13 Chapel congregation about his sexual deviance, which included
14 hanging around pornography shops. The Chapel's response to this
15 personal testimonial was to pray for Mr. Benson.

16 25. Robert Martinez was brought before the congregation for
17 being a batterer. The demons were rebuked, and supposedly the
18 problem was then resolved.

19 26. Rick Cole, another member of the Chapel, was suspected
20 of sexually abusing children. These allegations were commonly
21 known among the congregation and there was growing concern about
22 his being a youth minister. However, he was not removed from
23 that position by the Chapel management and it would have been
24 futile for the congregation to ask that Rick Cole be removed from
25 the position of youth minister.

DECLARATION OF
ROSEMARY TYKSINSKI - 6

1 27. Some members of the Chapel congregation referred to the
2 Chapel administration as "meat cleaver ministry". This is
3 referring to the fact that complaints, by Church members to the
4 Church management, would invariably backfire. People complaining
5 of being victimized, would be further victimized by the Chapel
6 upon complaining and the perpetrator would be exonerated.
7 Victims, at the Chapel, were not taken seriously or helped.

8 28. A Chapel member's extra-marital affairs were generally
9 known to the congregation, however, Barbara Barnett forbid anyone
10 to inform Jim Maxwell's wife of his affairs.

11 29. In 1982, the Chapel built dormitories at the new Church
12 site. There were many young people living in these dorms and
13 many of them came to me, in my counselor capacity, regarding
14 their problems. Every one of the youths I spoke to had a history
15 of sexual abuse, eating disorders and other problems. They also
16 related to me instances of sexual aggression, including rape, in
17 the dorms. I thought this astonishing and was concerned about
18 it. I took my concerns to Barbara Barnett and related this
19 information to her. Barbara Barnett did not respond, in any way,
20 to what I had related to her and nothing was ever done about the
21 problems in the dorms.

22 30. It was believed by the congregation that Barbara
23 Barnett spoke for God, she was the Voice of God. No one went
24 against Don and Barbara Barnett or anything they said. If a
25 member were to oppose them or any Chapel official, they could
expect to be publicly censured, privately rebuked, or disfellowshipped.

DECLARATION OF
ROSEMARY TYKSINSKI - 7

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31. I left the Chapel in 1985 because of the practice of spiritual connections. There was extensive crossing of sexual boundaries, such as involving children in spiritual connections, that I did not agree with. In fact, I felt that it was a frightening and amazing sight.

DATED this _____ day of October, 1994.

Rosemary Tyksinski

DECLARATION OF
ROSEMARY TYKSINSKI - 8

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

Case Archived 2x - 1st archive on computer system / ECR

2nd paper file of documents

CASE#: 93-2-25996-4 KNT JUDGMENT# NO JUDGE ID: 999
TITLE: CROWLEY ET AL VS COMMUNITY CHAPEL & BIBLE TRAINING CENTER ET AL
FILED: 10/19/1993
CAUSE: PIN PERSONAL INJURY DV:

RESOLUTION: DSM DATE: 03/03/1995 DISMISSAL WITHOUT TRIAL
COMPLETION: JODF DATE: 03/03/1995 JUDGMENT/ORDER/DECREE FILED
CASE STATUS: CMPL DATE: 03/03/1995 COMPLETED/RE-COMPLETED
ARCHIVED: RESTORE DATE : 11/08/2002
MICROFICHE: 06/16/2000
CONSOLIDT: 94-2-05356-6

NOTE1: *PROTECTIVE ORD SUBS 20,73**210 SEALED PER SUB 271*
NOTE2: * DOCKET UNDER THIS CAUSE. ATTY LIEN, SUB #89

----- PARTIES -----

CONN.	LAST NAME, FIRST MI TITLE	LITIGANTS	DATE
PLA01	CROWLEY, CATHERINE		
MNR01	HAVILAND, BRIANA		
PLA02	HAVILAND, KATHRYN		
PLA03	HAVILAND, WILLIAM		
MNR02	HAVILAND, DANIELLE	DSM	10/14/1994
MNR03	HAVILAND, ELISSA	DSM	10/14/1994
MNR04	HAVILAND, TESSA	DSM	10/14/1994
DEF01	COMMUNITY CHAPEL & BIBLE TRAINING CENTER		
DEF02	MANN, ROBERT		
DEF03	MANN, ALETA		
GAL01	CROWLEY, CATHERINE A		
ATP01	HOPKINS, FREDERICK F.		
BAR#	07077		
ATD01	ROHAN, ROBERT JOSEPH	1	
BAR#	07744		
ATD02	MANN, ROBERT		
STREET1	PO BOX 1354		
CITY/ST	SUMNER	WA	
ZIP	98390		
ATP02	STRONG, SIDNEY JAMES		
BAR#	01912		
ATP03	MARSH, KIMBERLY ANN		
BAR#	21071		
ATD03	SHAPIRO, ANTHONY DARROW	1	
BAR#	12824		
WTP04	REED, RICHARD D		
BAR#	09381		
ATD04	HAVILAND, KATHRYNE		
STREET1	253 S 163RD PL		
CITY/ST	SEATTLE	WA	
ZIP	98148		

Volumes 1-8

Vol. 1 1-352

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
-	10/19/1993	\$FFR	FILING FEE RECEIVED STRONG & KYDD	110.00
1	10/19/1993	SMCMP	SUMMONS & COMPLAINT	
2	10/19/1993	*ORSCS	SET CASE SCHEDULE	04-21-1995ST
3	10/19/1993	CICS	CASE INFORMATION COVER SHEET	
3A	10/19/1993	PTAPGL	PET FOR APPT OF GUARDIAN AD LITEM	
3B	10/19/1993	ORAPGL	ORDER APPOINTING GUARDIAN AD LITEM	
		GAL01	CROWLEY, CATHERINE A	
		EXP01	EX-PARTE, DEPT	
4	10/21/1993	NTAPR	NOTICE OF APPEARANCE FOR ALL DEFTS	
		ATD01	ROHAN, ROBERT JOSEPH	
5	10/22/1993	AFSR	AFFIDAVIT OF SERVICE	
6	11/16/1993	CSSRV	CONFIRM. SERV.:PARTIES TO BE SERVED	
7	12/13/1993	NTMTDK	NOTE FOR MOTION DOCKET	12-21-1993MS
		ACTION	MTN FOR DEFAULT/PLA	
8	12/13/1993	MTDFL	MOTION FOR DEFAULT	
-	12/13/1993	NOTE	P ATTY-CC	12-21-1993MS
-	12/13/1993	NOTE	D ATTY-CC NONE	12-21-1993MS
9	12/20/1993	AN	ANSWER OF COMMUNITY CHAPEL & BIBLE	
10	12/21/1993	AFSR	AFFIDAVIT OF SERVICE	
11	01/05/1994	AN	ANSWER OF ROBERT MANN	
12	01/05/1994	CS	CONFIRMATION OF SERVICE /AMENDED	
13	03/02/1994	NTAPR	NOTICE OF APPEARANCE FOR DEF COMMU- NITY CHAPEL & BIBLE TRAINING CENTER /AMENDED	
		ATD01	ROHAN, ROBERT JOSEPH	
14	03/18/1994	MT	MOTION TO INTERVENE AS PLAINTIFFS/I	03-28-1994MS
15	03/18/1994	NTMTDK	NOTE FOR MOTION DOCKET	
16	03/18/1994	MT	MOTION TO INTERVENE AS PLA/I	03-28-1994MS
17	03/18/1994	NTMTDK	NOTE FOR MOTION DOCKET	
18	03/18/1994	DCLR	DECLARATION OF RICHARD D REED	
-	03/21/1994	NOTE	P ATTY-CC NONE	03-28-1994MS
-	03/21/1994	NOTE	D ATTY-CC NONE	03-28-1994MS
19	03/28/1994	CJ	CONFIRMATION OF JOINDER	
-	03/28/1994	CJNSC	CONFIRM. JOIN.: NO STATUS CONFER.	
20	05/18/1994	PORD	PROTECTIVE ORDER	
		EXP01	EX-PARTE, DEPT	
-	07/19/1994	NOTE	P ATTY-CC	07-25-94
-	07/19/1994	NOTE	D ATTY-CC NONE	07-25-94
21	07/19/1994	NTMDLF	NOTE FOR MOTION DOCKET-LATE FILING	07-25-94
		ACTION	MTN TO CONSOLIDATE/PLA	
22	07/25/1994	ORCT	ORDER CONSOLIDATING FOR TRIAL	
23	07/26/1994	ORSTD	ORDER SETTING TRIAL DATE /ASSIGN IC	04-24-1995ST
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
		JDG23	JUDGE ANTHONY WARTNIK, DEPT 23	
			EFF 02-01-95	
24	08/08/1994	OR	ORDER ON ASSIGNMENT TO IC	
25	08/08/1994	MTHRG	MOTION HEARING CR NOT REPORTED	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
26	08/15/1994	AFML	AFFIDAVIT OF MAILING	
27	08/15/1994	DCLR	DECLARATION OF ROBERT J ROHAN	
28	08/15/1994	NTMTDK	NOTE FOR MOTION DOCKET	09-16-94

-APPEARANCE DOCKET-

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
29	08/15/1994	ACTION MT	11:00/PLA MTN FR PARTL SUMM JGMT	
30	08/31/1994	AFML	MOTION FR PARTL SUM JGMT/DEF COMMUN	
31	08/31/1994	NTMTDK	AFFIDAVIT OF MAILING	
32	09/06/1994	ACTION JSR	NOTE FOR MOTION DOCKET	10-14-94
33	09/06/1994	MT FR PRTL SUMM JGMT /11:00	JOINT STATUS REPORT	
34	09/06/1994	MTSMJG	MOTION FOR S/J /PARTL/PECHMAN/11AM	10-14-94
35	09/13/1994	NTMTDK	NOTE FOR MOTION DOCKET	
36	09/13/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
37	09/13/1994	DCLR	DECLARATION OF DAVID MOTHERWELL	
38	09/13/1994	DCLR	DECLARATION OF ROBERT J ROHAN	
39	09/13/1994	MT	MOTION FOR PROTECTIVE ORD/DEF	
40	09/13/1994	MTDSM	MOTION TO DISMISS	
41	09/13/1994	NTMTDK	NOTE FOR MOTION DOCKET	09-21-94
42	09/14/1994	ACTION	PECHMAN/MTN TO DISMISS/PLA	
43	09/22/1994	NTMTDK	NOTE FOR MOTION DOCKET	09-26-94
44	09/29/1994	ACTION AT	4:00/MTN FOR PROT ORD	
45	09/30/1994	NTMTDK	ATTACHMENT TO MTN FOR PROT ORD/DEF	10-11-94
46	10/03/1994	ACTION	NOTE FOR MOTION DOCKET	
47	10/03/1994	NTMTDK	4PM/PECHMAN/OA/PROTECTIVE ORD/PLA	10-11-94
48	10/03/1994	ACTION	NOTE FOR MOTION DOCKET	
49	10/03/1994	NTMTDK	4PM/PECHMAN/MTN TO DISMISS	10-11-94
50	10/03/1994	ACTION	FIDUCIARY DUTY CLAIM/PLA	
51	10/04/1994	CRTC	CERTIFICATE OF COMPLIANCE	
51A	10/04/1994	RSP	RESPONSE /PLTFS	
52	10/04/1994	DCLR	DECLARATION OF NORMAN FISHLER	
52A	10/04/1994	DCLR	DECLARATION KATHRYNE HAVILAND	
52B	10/04/1994	DCLR	DECLARATION RICHARD D REED	
53	10/05/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
54	10/05/1994	AF	AFFIDAVIT OF KIMBERLY A KONAT	
55	10/05/1994	MT	MOTION TO AMEND COMPLAINT	
56	10/06/1994	NTMTDK	NOTE FOR MOTION DOCKET	10-17-94
57	10/07/1994	ACTION	WOA/PECHMAN/ANEND COMPLAINT/PLA	
58	10/07/1994	CRRSP	CORRESPONDENCE FROM R D REED	
58A	10/07/1994	AMCPT	AMENDED COMPLAINT	
58B	10/07/1994	AF	AFFIDAVIT OF KIMBERLY A KONAT	
59	10/10/1994	RSP	RESPONSE OF PLTF RE MTN TO DISMISS	
59A	10/11/1994	RSP	RESPONSE OF PLTF RE MTN FOR PROTECT ORDER	
60	10/13/1994	BR	BRIEF /COMM CHAPELS REPLY	
61	10/13/1994	DCLR	DECLARATION OF ROBERT J ROHAN/SUPPL	
62	10/13/1994	RPY	REPLY OF COMMUNITY CHAPEL	
63	10/13/1994	AF	AFFIDAVIT OF ROSEMARY TYSKSINSKI	
64	10/14/1994	AF	AFFIDAVIT OF KAREN HEBERT	
		BR	BRIEF /COMM CHAPELS REPLY	
		MTHRG	MOTION HEARING	
		JDG41	ANITA OBRIEN	
		DCLR	JUDGE MARSHA J. PECHMAN, DEPT 41	
		BR	DECLARATION OF ROBERT J ROHAN	
		AFSR	BRIEF IN OPPO TO MTN TO AMEND CMPT	
		RSP	AFFIDAVIT/DECLARATION OF SERVICE	
		OR	RESPONSE /PLTFS	
			ORDER DISMISSING CERTAIN CLAIMS	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
65	10/14/1994	ORGPSJ	ORDER GRANT PARTIAL SUMMARY JDG	
65A	10/14/1994	SMJHRG	SUMMARY JUDGMENT HEARING CR EDWARD HOWARD	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
66	10/17/1994	RPY	REPLY OF PLTF	
67	10/19/1994	ORGLA	ORDER GRANTING LEAVE TO AMEND	
68	10/19/1994	MTHRG	MOTION HEARING CR NOT REPORTED	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
69	10/21/1994	MTHRG	MOTION HEARING CR EDWARD HOWARD	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
70	10/21/1994	ORDYMT	ORDER DENYING MOTION FOR PROTECTION & RE DISCOVERY	
71	10/26/1994	AMCPT	AMENDED COMPLAINT	
72	11/02/1994	ORDYMT	ORDER DENYING MOTION/PROTECTION & RE DISCOVERY	
73	11/04/1994	PORD	PROTECTIVE ORDER	
74	11/04/1994	MTHRG	MOTION HEARING CR NOT REPORTED	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
75	11/10/1994	CRRSF	CORRESPONDENCE RE PROTECTIVE ORDER	
76	11/21/1994	MT	PECHMAN/MTN FOR PROTECTIVE ORDER	12-01-94
77	11/21/1994	NTMTDK	NOTE FOR MOTION DOCKET	
78	11/21/1994	DCLR	DECLARATION OF JEFF MCGREGOR	
79	11/21/1994	DCLR	DECLARATION OF ROBERT J ROHAN	
80	11/23/1994	NTIWD	NOTICE OF INTENT TO WITHDRAW	
		WTP04	REED, RICHARD D	
81	11/28/1994	RSP	RESPONSE /PLTFS SEALED PER SUB 131	
82	11/28/1994	AF	AFFIDAVIT KIMBERLY A KONAT	
83	11/29/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
83A	11/30/1994	DCLR	DECLARATION ROBERT J ROHAN/SUPPL	
83B	11/30/1994	BR	BRIEF / COMM CHAPEL REPLY	
84	12/01/1994	RSP	RESPONSE /PLTFS SUPPL	
85	12/02/1994	MTHRG	MOTION HEARING CR J MAJURY	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
86	12/02/1994	APPS	APPEARANCE PRO SE /K HAVILAND	
87	12/05/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
88	12/05/1994	AFML	AFFIDAVIT OF MAILING	
89	12/05/1994	\$ATL	ATTY LIEN BY RICHARD D REED & THE OFFICE OF JUDITH A LONNQUIST, P.S. FOR \$63,873.63 FOR SERVICES RENDER TO KATHRYNE WILLIAM, DANIELLE, ELISSA & TESSA HAVILAND IN THE ABOVE ENTITLED CAUSE OF ACTION	
90	12/08/1994	AFML	AFFIDAVIT OF MAILING	
91	12/09/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
92	12/12/1994	OR	ORDER RE CLERGY/COMMUNICANT PRVLGE	
93	12/12/1994	MTHRG	MOTION HEARING CR EDWARD HOWARD	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
94	12/16/1994	AF	AFFIDAVIT OF KIMBERLY A KONAT	
95	12/16/1994	MT	MTN TO RECONSDR ORDR /PLTF HAVILAND	
96	12/16/1994	AF	AFFIDAVIT OF KIMBERLY A KONAT	
97	12/20/1994	SBDT	SUBPOENA DUCES TECUM	
98	12/20/1994	NTOEX	NOTICE OF ORAL EXAM	
99	12/20/1994	AFML	AFFIDAVIT OF MAILING	
100	12/20/1994	NT	NOTICE OF VACATION	
101	12/21/1994	NT	NOTICE OF VACATION	
102	12/22/1994	MTRC	NOA/PECHMAN/UNSEALING RECORDS/PLA	
103	12/22/1994	NTMTDK	NOTE FOR MOTION DOCKET	01-05-95
103A	12/22/1994	NTMTDK	NOTE FOR MOTION DOCKET	
		ACTION	MOTION TO AMENED COMPLIANT	01-05-95
104	12/22/1994	AF	AFFIDAVIT OF LESLIE SHELBY	
105	12/22/1994	AF	AFFIDAVIT OF KIMBERLY KONAT	
106	12/22/1994	MT	MOTION TO AMEND PLA COMPLAINT	
106A	12/22/1994	AF	AFFIDAVIT OF KIMBERLY A. KONAT	
107	12/27/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
108	12/27/1994	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
108A	12/29/1994	MT	MOTION FOR DISCOVERY	
109	12/30/1994	BR	BRIEF /COMMUNITY CHAPEL	
110	12/30/1994	DCLR	DECLARATION OF R J ROHAN	
111	01/03/1995	ORDYMT	ORDER DENYING MOTION/PETITION	
112	01/03/1995	MTHRG	MOTION HEARING	
		JDG41	CR EDWARD HOWARD	
113	01/04/1995	AFML	JUDGE MARSHA J. PECHMAN, DEPT 41	
114	01/04/1995	AFML	AFFIDAVIT OF MAILING	
115	01/05/1995	AFSR	AFFIDAVIT OF MAILING	
116	01/06/1995	DIS	AFFIDAVIT/DECLARATION OF SERVICE	
117	01/06/1995	DIS	DISCLOSURE PRIM WITNESS/COMM CHAPEL	
118	01/09/1995	AFML	DISCLOSURE PRIM WITNESS/MANNS	
119	01/09/1995	AFML	AFFIDAVIT OF MAILING	
120	01/10/1995	NTMTDK	AFFIDAVIT OF MAILING	
		ACTION	NOTE FOR MOTION DOCKET - RENOTE	01-23-95
121	01/10/1995	BR	PECHMAN/MIN TO UNSEAL FILES/PLA	
122	01/10/1995	BR	BRIEF /ROBERT MANNS	
123	01/10/1995	AFML	BRIEF /COMM CHAPEL	
124	01/10/1995	AF	AFFIDAVIT OF MAILING	
125	01/10/1995	AFML	AFFIDAVIT OF LESLIE R SHELBY	
126	01/10/1995	AFML	AFFIDAVIT OF MAILING	
127	01/09/1995	\$JDR12	AFFIDAVIT OF MAILING	
			JURY DEMAND RECEIVED - TWELVE	100.00
			STRONG & KYDD	
128	01/11/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
129	01/11/1995	AFML	AFFIDAVIT OF MAILING	
129A	01/11/1995	CRRSP	AFFIDAVIT OF MAILING	
130	01/12/1995	AFSR	CORRESPONDENCE FROM KAREN HEBERT	
131	01/13/1995	ORSRF	AFFIDAVIT/DECLARATION OF SERVICE	
132	01/13/1995	MTHRG	ORD SEALING RECORD/FILE/SUB 81 ONLY	
			MOTION HEARING	
			CR NOT REPORTED	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
133	01/17/1995	AFML	AFFIDAVIT OF MAILING	
134	01/17/1995	AFML	AFFIDAVIT OF MAILING	
135	01/19/1995	NTOEX	NOTICE OF ORAL EXAM	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
136	01/19/1995	AFML	AFFIDAVIT OF MAILING	
137	01/19/1995	SBDT	SUBPOENA DUCES TECUM	
138	01/19/1995	MTSMJG	MOTION FOR SUMMARY JUDGMENT /DEF	
139	01/19/1995	NTMTDK	NOTE FOR MOTION DOCKET	01-27-95
		ACTION	PECHMAN/MTN TO COMPEL/DEF	
140	01/20/1995	MT	MOTION FOR ORD UNSEALING DISSL.	
141	01/20/1995	AFML	AFFIDAVIT OF MAILING	
142	01/20/1995	AF	AFFIDAVIT OF KIMBERLY KONAT	
143	01/20/1995	AFML	AFFIDAVIT OF MAILING	
144	01/24/1995	AF	AFFIDAVIT OF ROBERT E MANNS	
145	01/24/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
146	01/24/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
147	01/24/1995	AFML	AFFIDAVIT OF MAILING	
147A	01/24/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
147B	01/24/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
147C	01/24/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
148	01/25/1995	RSP	RESPONSE /PLTFS	
149	01/25/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
150	01/25/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
151	01/25/1995	AFML	AFFIDAVIT OF MAILING	
152	01/27/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
153	01/27/1995	MTHRG	MOTION HEARING CR NOT REPORTED	
		JDG41	JUDGE MARSHA J. PECHMAN, DEPT 41	
154	01/27/1995	ORDYMT	ORDER DENYING MOTION TO UNSEAL FILE	
155	01/27/1995	ORCCR	ORD CONFIRMNG COMMISSIONER'S RULING	
156	01/27/1995	ORGLA	ORDER GRANTING LEAVE TO AMEND CMPLT	
157	02/02/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
158	02/02/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
159	02/02/1995	AFML	AFFIDAVIT OF MAILING	
160	02/02/1995	AMCPT	AMENDED COMPLAINT	
161	02/02/1995	REC	RECUSAL OF JUDGE WARTNIK	
162	02/03/1995	AN	ANSWER TO AMEND CMLNT/COMM CHAPEL	
163	02/07/1995	MTRC	MOTION FOR RECONSIDERATION /PLA	
164	02/07/1995	DIS	DISCLOSURE RBTL WITNESS/COMM CHAPEL	
165	02/15/1995	AN	ANSWER /ROBERT MANNS	
166	02/16/1995	OR	ORDER TO TURN OVER RECORDS OR S/C 8:30/HAYDEN	02-24-95
167	02/16/1995	ORACS	ORDER AMENDING CASE SCHEDULE	
167A	02/16/1995	MTHRG	MOTION HEARING CR NOT REPORTED	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
168	02/17/1995	RSP	RESPONSE	
169	02/21/1995	DIS	DISCLOSURE RBTL WTNS/DEFS SUPPL	
170	02/21/1995	OR	ORDER ON MTN FOR RECONSIDERATION	
171	02/24/1995	NTMTDK	NOTE FOR MOTION DOCKET	03-06-95
		ACTION	HAYDEN/MTN TO BAR EVIDENCE/LIMIT	
		ACTION	WITNESSES	
172	02/24/1995	MT	DEF MTN TO BAR EVIDENCE	
173	02/24/1995	MT	DEF MTN TO STRIKE	
174	02/24/1995	DCLR	DECLARATION JEFFREY MCGREGOR	
175	02/24/1995	DCLR	DECLARATION ROBERT J ROHAN	
176	02/24/1995	DCLR	DECLARATION ROBERT J ROHAN	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
177	02/27/1995	OR	ORDER ON PRE TRIAL CONFERENCE	
177A	02/27/1995	TCNTU	TRIAL CONTINUED: UNSPECIFIED	
			CR JODI VANN	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
178	03/01/1995	MTDSM	MOTION TO DISMISS /PLA/PECHMAN	
179	03/01/1995	MTC	MOTION TO CONTINUE /PLTFS	
180	03/01/1995	ORCNT	ORD CONT MTN TO BAR EVIDENCE	03-20-95
180A	03/01/1995	MTHRG	MOTION HEARING	
			CR NOT REPORTED	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
181	03/03/1995	DIS	DISCLOSURE POSS PRIM WTNS/PLA 3RD	
			REVISED	
182	03/03/1995	RSP	RESPONSE /PLTFS	
183	03/03/1995	ORDSM	ORDER OF DISMISSAL	
183A	03/03/1995	MTHRG	MOTION HEARING	
			CR NOT REPORTED	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
183B	03/03/1995	OR	ORDER COMPELLING RECORDS	
184	03/07/1995	DIS	DISCLOSURE OF DEF COMMUNITY CHAPEL	
			POSSIBLE WITNESSES	
185	03/07/1995	AFML	AFFIDAVIT OF MAILING	
186	03/08/1995	AFML	AFFIDAVIT OF MAILING	
187	03/08/1995	DCLR	DECLARATION OF ROBERT J ROHAN	
188	03/08/1995	CRTC	CERTIFICATE OF COMPLIANCE	
189	03/08/1995	MTCM	HAYDEN/ COMPEL DISCOVERY/DEF	03-16-95
190	03/08/1995	NTMTDK	NOTE FOR MOTION DOCKET	
191	03/09/1995	AFML	AFFIDAVIT OF MAILING	
192	03/09/1995	DCLR	DECLARATION ROBERT J ROHAN	
193	03/09/1995	MTSMJG	MTN SUM JDGMT/COMMUNITY CHAPELS	
194	03/09/1995	DCLR	DECLARATION OF ROBERT ROHAN	
195	03/09/1995	MT	HAYDEN/ STRIKE PLA'S WITNESS/DEF	04-06-95
196	03/09/1995	NTMTDK	NOTE FOR MOTION DOCKET	
197	03/09/1995	NTMTDK	NOTE FOR MOTION DOCKET	03-17-95
			ACTION HAYDEN/STRIKE CERTN OF PLA WITNESS	
			/DEF	
198	03/15/1995	DCLR	DECLARATION OF ROBERT MANNS	
199	03/15/1995	RSP	RESPONSE /PLTFS	
200	03/15/1995	AF	AFFIDAVIT KIMBERLY A KONAT	
201	03/15/1995	AF	AFFIDAVIT KIMBERLY A KONAT	
202	03/15/1995	RSP	RESPONSE /PLTFS	
203	03/15/1995	AFML	AFFIDAVIT OF MAILING	
204	03/16/1995	AFML	AFFIDAVIT OF MAILING	
205	03/16/1995	BR	BRIEF /COMM CHAPELS REPLY	
206	03/16/1995	DCLR	DECLARATION ROBERT J ROHAN/2ND DCLR	
207	03/16/1995	RPY	REPLY /COMM CHAPELS	
208	03/21/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
209	03/24/1995	CRRSP	CORRESPONDENCE FROM MARY JO TATE	
210	03/27/1995	AF	AFFIDAVIT OF KIMBERLY A KONAT	
			SEALED PER SUB 271	
211	03/27/1995	RSP	RESPONSE /PLTFS	
212	03/27/1995	RSP	RESPONSE /PLTFS	
213	03/27/1995	ST	STATEMENT OF FACTS/PLAINTIFF	
214	03/27/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
214A	03/27/1995	AF	AFFIDAVIT OF SANDY ANDERSON	
215	03/30/1995	DCLR	DECLARATION OF ROBERT J ROHAN	
216	03/30/1995	MT	HAYDEN/EXTEND DEPOSITION/DEF	
217	03/30/1995	NTMTDK	NOTE FOR MOTION DOCKET	04-07-95
218	04/03/1995	DCLR	DECLARATION OF DAVID FOSTER KOTH	
219	04/03/1995	MM	MEMORANDUM /COMM CHAPEL REPLY	
220	04/03/1995	BR	BRIEF /COMM CHAPELS REPLY	
221	04/03/1995	DCLR	DECLARATION OF ROBERT MANNS	
222	04/03/1995	DCLR	DECLARATION OF DIANNA SCHULLER	
223	04/03/1995	DCLR	DECLARATION OF DEAN GREETHEN	
224	04/03/1995	DCLR	DECLARATION OF JEANNE BLALOCK	
225	04/05/1995	RSP	RESPONSE /PLTFS	
226	04/06/1995	AF	AFFIDAVIT KIMBERLY A KONAT	
227	04/06/1995	RSP	RESPONSE /PLTFS SUPPL	
227A	04/07/1995	SMJHRG	SUMMARY JUDGMENT HEARING	
			CR NOT REPORTED{	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
228	04/11/1995	CRRSP	CORRESPONDENCE FROM MARY JO TATE	
229	04/12/1995	MTHRG	MOTION HEARING	
			CR NOT REPORTED	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
230	04/12/1995	OR	ORDER RE MOTION TO STRIKE CERTAIN WITNESSES	
231	04/13/1995	CRRSP	CORRESPONDENCE RE SIGNATURE SHEET	
232	04/13/1995	MTCM	HAYDEN/MTN TO COMPEL DSCVRY/DEF	04-21-95
233	04/13/1995	NTMTDK	NOTE FOR MOTION DOCKET	
234	04/13/1995	DCLR	DECLARATION OF ROBERT J ROHAN	
235	04/14/1995	MTRC	MOTION FOR RECONSIDERATION	04-24-95
236	04/14/1995	NTMTDK	NOTE FOR MOTION DOCKET	
236A	04/17/1995	DCLR	DECLARATION OF ROBERT J ROHAN	
237	04/18/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
238	04/17/1995	MT	MOTION TO BAR EXPERT/DEF	
239	04/17/1995	MT	HAYDEN/MTN TO BIFURCATE/DEF	04-25-95
240	04/17/1995	NTMTDK	NOTE FOR MOTION DOCKET	
241	04/17/1995	NTMTDK	NOTE FOR MOTION DOCKET	04-25-95
			ACTION	
241A	04/18/1995	ORDYMT	ORDER DENYING MOTION RE DISCOVERY	
242	04/19/1995	MT	MOTION FOR ORD SHRTN TIME	
243	04/19/1995	ORSGT	ORDER SHORTENING TIME	04-21-95
			ACTION	
244	04/18/1995	MTHRG	HAYDEN/ORD SHRTN TIME RE DEPOSTNS	
			MOTION HEARING	
			CR NOT REPORTED	
		JDG14	JUDGE BRIAN D. GAIN, DEPT 14	
245	04/19/1995	AF	AFFIDAVIT OF KIMBERLY A KONAT	
246	04/19/1995	AF	AFFIDAVIT OF LESLIE R SHELBY	
247	04/19/1995	AF	AFFIDAVIT OF LESLIE R SHELBY	
248	04/19/1995	DCLR	DECLARATION OF KIMBERLY A KONAT IN	
			SPPT MTN TO TAKE PERPRETUATION DEPO	
249	04/19/1995	DCLR	DECLARATION OF KIMBERLY A KONAT IN	
			SPPT OF MTN TO EXCLUDE MED EVIDENCE	
250	04/19/1995	RSP	RESPONSE OF PLTF	
251	04/19/1995	MT	MOTION PERPETUATE DEPOS BY PHONE	04-21-95
252	04/19/1995	NTMDLF	NOTE FOR MOTION DOCKET-LATE FILING	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
253	04/19/1995	MTL	HAYDEN/MTN IN LIMINE	
254	04/19/1995	NTMTDK	NOTE FOR MOTION DOCKET	05-08-95
254A	04/19/1995	MTHRG	MOTION HEARING	
			CR NOT REPORTED{	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
255	04/20/1995	DCLR	DECLARATION ROBERT J ROHAN	
256	04/20/1995	BR	BRIEF /COMMUNITY CHAPELS	
257	04/21/1995	ORAU	ORDER AUTH TELEPHONE DEPOSITION	
258	04/21/1995	DCLR	DECLARATION OF KIMBERLY KONAT	
259	04/21/1995	RSP	RESPONSE/HAVILAND	
259A	04/21/1995	CRRSP	CORRESPONDENCE /MARY JO TATE	
259B	04/21/1995	STAHRG	STATUS CONFERENCE / HEARING	
			CR NOT REPORTED	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
259C	04/21/1995	NT	NOTICE OF PROPOSED VOIR DIRE/PLA	
259D	04/21/1995	JYN	JURY NOTE/PLA	
260	04/24/1995	DCLR	DECLARATION OF ROBERT ROHAN	
261	04/24/1995	RPY	REPLY BRIEF OF COMMUNITY CHAPEL	
262	04/24/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
263	04/25/1995	RSP	RESPONSE /PLTFS	
264	04/25/1995	AF	AFFIDAVIT OF KIMBERLY A KONAT	
265	04/26/1995	MTL	MOTION IN LIMINE/DEF COMM CHAPEL	
266	04/28/1995	MTHRG	MOTION HEARING	
			CR JANE LAMERLE	
		EXP01	EX-PARTE, DEPT	
267	04/28/1995	NT	NOTICE OF AUTHORIZATION	
268	05/01/1995	AFSR	AFFIDAVIT/DECLARATION OF SERVICE	
269	05/01/1995	NTFD	NOTICE OF FILING/SERVICE DEPOSITION	
270	05/12/1995	AF	AFFIDAVIT KIMBERLY A KONAT	
271	05/12/1995	ORSRF	ORD SEALING RECORD/FILE RE LISTED	
			DOCUMENTS ONLY	
272	05/19/1995	NT	NOTICE ABSENCE FROM OFFICE	
273	06/02/1995	PT	PETITION FOR APPRVAL OF SETTLMNT OF	
			MINOR'S CLAIM/PLA	
			SEALED PER SUB 271 PROTECTIVE ORDER	
274	06/02/1995	ORDSMS	ORDER OF DISMISSAL - STIPULATED	
275	06/02/1995	MTHRG	MOTION HEARING	
			CR NOT REPORTED	
		JDG16	JUDGE MICHAEL HAYDEN, DEPT 16	
276	06/02/1995	ORAPST	ORDER APPROVING SETTLEMENT	
			SEALED PER PROTECTIVE ORDER	
277	06/02/1995	OR	ORD/ CLERK TO ACCEPT/DEPOSIT DRAFTS	
278	07/28/1995	CRRSP	CORRESPONDENCE	
279	09/06/1995	PT	PET FR APPROVAL OF TRUST AGREEMENT	
			/ORDER TO RELEASE FUNDS TO TRUSTEE	
			*SEALED SUB PER SUB 271**	
280	09/06/1995	AG	AGREEMENT /TRUST	
			SEALED SUB PER SUB 271	
281	09/06/1995	ORST	ORDER SETTING BOND/BLOCK ASSETS/	
			PROVIDE FR ANNUAL RPT/STIP	
			SEALED SUB PER SUB 271*	
282	09/15/1995	PT	PET RE BOND	
			SEALED PER SUB 271	

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

SUB#	DATE	CODE/ CONN	DESCRIPTION/NAME	SECONDARY
283	09/15/1995	AGOR	AGREED ORDER REDUCING BOND SEALED PER SUB 271	
284	09/18/1995	BN	BOND - \$25,000.00***	
285	03/14/1997	ANR	ANNUAL REPORT OF TRUSTEE SEALED SUB PER SUB 271	
286	03/14/1997	PT	1:30/PET APPRV REPORT	03-31-1997MX
287	03/14/1997	NTMTDK	NOTE FOR MOTION DOCKET	
288	03/14/1997	RPT	REPORT SEALED SUB PER SUB 271	
289	03/14/1997	AFML	AFFIDAVIT OF MAILING	
290	03/31/1997	DCLR	DECLARATION ROGER S KOHN	
291	03/31/1997	ORAPRT	ORDER APPROVING REPORT OF TRUSTEE	
		EXP01	EX-PARTE, DEPT	
292	03/31/1997	MTHRG	MOTION HEARING	
		EXP01	EX-PARTE, DEPT	
293	11/18/1997	ORCCA	ORDER CHANGING CASE ASSIGNMENT AREA	
		LOCK1	TRANSFER-FACILITATE ACCESS AT KENT	
		EXP01	EX-PARTE, DEPT	
294	11/21/1997	PT	PETITION FR APROVAL OF TRUSTEES ANNUAL REPORT	
295	11/21/1997	NTMTDK	NOTE FOR MOTION DOCKET	12-05-1997KP
		ACTION	11AM/MTN FR APPRV OF TRUST ANN RPT	
296	11/21/1997	ANR	ANNUAL REPORT OF TRUSTEE /SEALED PER SUBS 20/73	
297	11/21/1997	ORCCA	ORD CHANGING CASE ASSIGMT AREA/COPY	
298	11/21/1997	AFML	AFFIDAVIT OF MAILING	
299	12/05/1997	LTR	LETTERS OF RESIGNATION FROM MEMBERS OF TRUST ADCISORY COMMITTEE	
300	12/05/1997	OR	ORDER APPROVE ANNUAL REPORT TRUSTEE	
		EXP04	EX-PARTE, DEPT - KENT	
301	12/05/1997	DCLR	DECLARATION OF ROGER S KOHN	
302	12/05/1997	MTHRG	MOTION HEARING	
		EXP04	EX-PARTE, DEPT - KENT	

-----END-----

Michael J. Tyksinski
1210 Southwest 160th Street
Seattle, WA 98166
Phone: (206) 246-1918

COPY

August 15, 1988

Barbara Mertens, Director of Private Education
Superintendent of Public Instruction
Old Capitol Building FG-11
Olympia, WA 98504

RE: Community Chapel Christian School, Seattle

Dear Ms. Mertens,

I have recently been informed that my children have been enrolled in Community Chapel Christian school, by my ex-wife and against my wishes.

I am very concerned about this, as I have been very aware of this school, and believe there may be great potential for harm to my children as a result of their attendance there.

I would like to list in detail some of these concerns.

1. The president of the school, Donald Lee Barnett, is a convicted exhibitionist (see attachments), who is currently defendant in several lawsuits which accuse him of frequent similar behavior with numbers of his followers; that is, he shows no sign of reform.
2. Mr. Barnett, according to the current bylaws of his corporation, has unhindered absolute control of the school, the school organization, school policy, school staff, and all areas of instruction and education.
3. Washington State has had considerable problem with failure on the part of Community Chapel staff to report, and not shield, incidences of child physical and sexual abuse, by members of the attached church, and in one case a school teacher. This has resulted in meetings between school staff and the state Attorney General yet after these meetings several incidences of shielding of abuse led to the filing of charges of non-reporting by the King County Prosecutor. All charges ended in convictions, yet after the last conviction, David Motherwell, head counselor and convicted defendant, stated before their church body during a regular church service that he had no intention to change the behavior which led to his conviction; this statement was taped by the church and we have a copy of that tape.

EXHIBIT E

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page 1 of 14/1988

4. Mr. Barnett is the teacher of the "connection" doctrine, which espouses intimate physical and emotional relationships between individuals in the church regardless of marital status, sex, or age. This has led to literally hundreds of divorces and separations among his followers, many of whom have identified this doctrine in affidavits filed in Family Court actions as the primary cause of their marital crises. Concerning children, he has encouraged and allowed these relations between adults and children, children and children, Sunday School staff and children, and Christian school staff and children. This has resulted in approximately ten convictions of church members of child sexual abuse, indecent liberties, and sexual communication with a minor in the last two years. King County police have been free to state "off the record" that the "connection" doctrine was central in these some of these cases. One of these cases was the aforementioned Christian school teacher who was convicted and imprisoned after seducing one of his pupils; the offender has served his sentence and is again a member of the church. Also, because of this doctrine my own children have been pursued by adult members of the church, in the case of my son by his Sunday school teacher; only after the most vigorous protests and threats did the church accede to my desire to end these relationships. That this doctrine has pervaded the Christian school has been reported in the press (attached) by the ex-elementary school principal, Betty Leonard, who stated that Mr. Barnett insisted upon implementing his doctrine in the school, during the school chapels and in the classrooms, over her strong objections concerning the potential harm; this objection led to her resignation.
5. My wife has spoken to several local public school teachers and counselors, who have been unanimous in stating that the problems with integrating Community Chapel ex-pupils into the public schools include: 1. extreme mental distress requiring extensive counseling; 2. strong suspicion of the public school; 3. aberrant behavior, especially playground displays of sexual precocity in elementary school children, I.E., seven year olds attempting to French kiss their classmates, sexual fondling, etc., and; 4. a lack of fundamental educational accomplishments sufficient to require extra tutoring or placement in classes with younger children.
6. In the period since Community Chapel received their current Washington State Private School Accreditation these significant events have occurred which I believe will make it very difficult for the school to comply with the state standards for private schools:

the church has split into two competing groups as a result of the church government attempt to remove Mr. Barnett for sexual misconduct, the majority of the church and school staff have indicated they will not work for Mr. Barnett, greatly reducing the available

school staff.

Approximately 75% of the church membership has left the church, reducing potential church and school income by the same amount.

"OPEN AND CROSS

(EVIDENCE)

A prior conviction of Mr. Barnett for "lewd and immoral behavior", specifically masturbating in front of a mirror in a public hallway before four hotel maids in Las Vegas, Nevada.

Numerous lawsuits filed against Mr. Barnett, as well as other church government and staff members, and the church corporation, have resulted, we have been told and are now attempting to verify, in a complete inability on the part of Community Chapel to secure any insurance coverage for liability or even fire.

My additional concerns with this school include:

Their policy on corporal punishment includes spankings administered with a stick.

They appear to have no available certified teachers.

They have no uniform standards or competency tests for non-accredited instructors.

They appear to have no available on grounds school nurse.

The church teachings in the past have discouraged immunizations, CONSEQUENTI...

They offer no drug or sex education program.

Their academic standards are extremely lax; their students consistently are unable to perform at the minimum level required for their class level, when entering the public school system. Several ex-teachers have reported that the school prepares the students for the various achievement tests by extensive drilling from the earlier issues of those tests just prior to testing dates.

The students are trained in the "connection" teaching in school, and are encouraged in such behavior with each other and with school staff.

School chapels and prayer meetings are frequently comprised of "demon-deliverance" sessions, wherein students as young as four and five are taught that normal emotions, childish behaviors, concerns or doubts about their instruction, church, or school, and church-proscribed wishes and desires for, for example, moderate modern haircuts and clothing, are the result of "demons living in them and infesting their bodies", from which they need to be "delivered". Both students and teachers then will gather

around the subject student to pray loudly, "rebuking the demon" and "casting it out". This will occur with devastating results over an incident as innocent as a child's normal fears concerning the separation or breakup of his or her parents, something which has occurred in the overwhelming majority of the families of students at this school.

This is essentially the bulk of my concerns regarding Community Chapel Christian School. In all but a few minor areas of concern, I have extensive substantiation of my claims, often from Community Chapel produced documents or audio tapes, in other cases from court records. In several cases I am able to solicit affidavits attesting to my allegations, from ex-pupils of this school and their parents, and most notably in cases which have concerned the local public school teachers and counselors, some of whom have offered such documentation. I have made no charges which are the result of unsubstantiated rumors.

I remain appalled that this school is able to continue to operate in Washington state, in my neighborhood. I recognize that our state has allowed private schools to function with considerable leeway, and that is a policy which I believe has merit. But we seem to be dealing here with an organization which has continually exhibited the utmost contempt for the welfare of the children entrusted to its care, and whose principals and founder have been found to respond to the concerns of the community with secrecy and chronic deceit.

I do not know what can be done about an organization of this caliber by the offices of the Superintendent of Public Instruction. But this school currently operates with certification from Washington state. Therefore it is your office that I address these concerns. I wish this letter of complaint to be filed in your office. I hope to hear from your office. I will no doubt be writing again.

Thank you very much.

Sincerely,

Michael J. Tyksinski

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IN THE SUPERIOR COURT OF WASHINGTON, KING COUNTY

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

No. 93-2-25996-4

Plaintiffs,)

AFFIDAVIT OF KAREN HEBERT

vs.)

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

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, Karen Hebert, swear that the following is true and
correct:

Affidavit of Karen Hebert - 1

EXHIBIT B

page 1 of 5

STRONG & KYDD
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1. I am a former member of Community Chapel and Bible Training Center. I attended Community Chapel from January 1969, at age nineteen, for one and one-half years. I left the Chapel for a period of three years, I then returned to the Chapel until I left in 1993.

2. At the time I attended Community Chapel, my former husband was a Minister of music, he also occasionally preached sermons.

3. During the time my former husband, my children and I attended Community Chapel, two of my children were sexually molested by Mark Martin. Mark Martin was a member of Community Chapel and also a Minister of music.

4. Mark Martin plead guilty to the rape of my children. He was sentenced to only nine months in jail and was out of jail in four months.

5. Before I learned the full extent of Mark Martin's molestation of my children and before he was criminally charged, Mr. Martin became more involved with youth at the church. As I was, at this point, concerned about my own children's contact with Mark Martin, I called the youth leader, Tom Colburn, and warned him about Mark Martin. To my knowledge, nothing was ever said to the parents of the youth in response to my warning.

6. I informed Jeff McGregor and David Motherwell (church elders) about Mark Martin's sexual abuse of my children. I asked Jeff McGregor to make a statement to the church congregation

Affidavit of Karen Hebert - 2

1 warning them about Mark Martin. The church refused to warn the
2 congregation about Mark Martin.

3 7. On two occasions a church member, Jim Wilson, told the
4 congregation that the rapes of my children were my fault and the
5 fault of my children, and that I was only seeking revenge against
6 Mark Martin. Other members, including myself, asked David
7 Motherwell and Jeff Wilson to tell the congregation the truth
8 about Mark Martin and to renounce the statements of Jeff Wilson.
9 The church leadership again refused to address the congregation
10 regarding the truth about Mark Martin.

11 8. I was told about the molestation of a church member's
12 child. The member, who was the child's mother, was aware that
13 the molestation was continuing, and merely asked the perpetrator
14 not to tell her child's father about the molestation. The
15 perpetrator was a church elder, and for some time, was the
16 pastor.

17 9. I remember that Gary and Lolla Rurrup very quietly left
18 the church, and the congregation never knew why. I knew nothing
19 of the allegations that Don Barnett had molested the Rurrup's
20 daughter until twenty years after the Rurrups left the church.

21 10. The church informed the congregation that Rick Cole, a
22 teacher in Community Chapel's Christian School, was going to take
23 some time off from teaching to pursue other interests. The
24 church did not say why Rick Cole was taking time off from
25 teaching, nor did it indicate that he was being removed from his
teaching position, only that he was going to take time off to do

Affidavit of Karen Hebert - 3

1 some other things. Some time later, the congregation became
2 aware of Rick Cole's molestation of Seth Dalby, a child who
3 attended Community Chapel. Don Barnett addressed the church from
4 the pulpit and said, "It takes two." Don Barnett said that
5 Seth's molestation was Seth Dalby's and his parent's fault. To
6 my knowledge, the church leadership was aware of Rick Cole's
7 improper sexual conduct and allowed him to continue teaching.
8 The congregation was informed by the Dalby's after they learned
9 that their son had been molested by Cole a second time.

10 11. Children in public schools were instructed about the
11 so-called "bathing suit area" and improper touching, however,
12 children who attended Community Chapel's Christian School were
13 never informed or instructed about improper touching.

14 12. The church never told parishioners that the laws
15 required us to report allegations of abuse. In fact, the church
16 constantly told us horror stories about CPS. We were taught to
17 fear CPS and never to go to outside agencies like CPS.

18 13. I recall an occasion when Tammy Fenn, the child of Mark
19 and Terri Fenn, who was two or three years old at the time, was
20 brought to me by a secretary of Barbara Barnett, the pastor's
21 wife. The child had been obviously physically abused. I was
22 asked to keep the child over the weekend, and instructed not to
23 tell anyone about the physical abuse.

24 14. Community Chapel exerted very stringent control over
25 its members and forbid us to go to outsiders for assistance of
any type.

Affidavit of Karen Hebert - 4

15. We were trained not to listen to dissenters -- to cut
1 them off. We were told that we didn't need to read newspaper
2 articles.

3 16. Several members who had been disfellowshipped commenced
4 letter writing campaigns to the members of Community Chapel,
5 trying to convince them to leave the Church. Don Barnett, from
6 the pulpit, told the congregation that we would be receiving mail
7 from these disfellowshipped groups and he instructed us not to
8 open any mail from these persons, saying that it contained only
9 false accusations. Don Barnett convinced the congregation that
10 the Markham family and many others had committed mutiny by
11 leaving the church. I later learned that the Markham family, who
12 commenced a letter writing campaign, left the church because of
13 the sexual advances of Don Barnett.

14 17. To the best of my recollection, the Church did not ever
15 specifically forbid spiritual connections between adults and
16 children. I was aware of spiritual connections between adults
17 and children.

18 DATED this 4th day of October, 1994.

19
20 Karen Hebert
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Affidavit of Karen Hebert - 5

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

In Re the Marriage of:)
KAREN S. HEBERT,)
Petitioner,)
and)
JEROME A. HEBERT,)
Respondent.)

NO. 91-3-03348-9
AFFIDAVIT OF MARK WIDAMAN
IN SUPPORT OF PETITION FOR
MODIFICATION OF PARENTING PLAN

STATE OF WASHINGTON)
COUNTY OF KING) ss

THE UNDERSIGNED, MARK WIDAMAN, first being duly sworn, hereby states:
1. I am a social worker for DSHS, Pierce County office.
2. I am competent to testify.
3. I have personal knowledge of the matters testified to herein.
4. I have been the social worker assigned to the case regarding the welfare of the Hebert children since February 3, 1992.

BEST AVAILABLE COPY

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2 5. I went to the home of the mother in response to a confidential
3 referral (Exhibit A) regarding allegations of sexual abuse and the mother's lack
4 of protection for the children. I found no one at home.

5 6. On 2/22/92 I received a Family Reconciliation Services referral in
6 which the mother stated to the intake worker that both Clare and Madeline were
7 out of the mother's control, and that they had physically abused her (the
8 mother). See Exhibit B attached.

9 7. On 2/26/92 (date on paper is incorrect), my supervisor, Ward Peterson,
10 called the mother and she stated that she had been hit by one of the daughters,
11 that she could not control Clare and Madeline, and that they are laughing at her
12 because when she called the police, the police did nothing. The mother stated
13 that she wanted the daughters placed.

14 8. On 3/24/92, I visited the home again and found that Clare and Madeline
15 were staying with the father and his new wife in Seattle and had been there
16 since 2/26/92.

17 9. At that time, I discussed with the mother the need for counselling for
18 Rosemary and Justin with regard to the past sexual abuse by the long time
19 associate of hers, Mark Martin.

20 10. The mother told me at that time that Mark Martin had admitted to
21 sexually abusing Rosemary and Madeline. She said that she had confronted Mark
22 Martin with regard to sexual abuse of Clare, but he denied it, and the mother
23 tended to minimize the situation. She made the statement that Clare had gone to
24 Mark Martin's home alone and so "she was asking for it."

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2 11. In a subsequent interview with Clare, she told me that in fact, Mark
3 Martin called her up and told her that he had a present for her and asked her to
4 come over and pick it up. When she got there, he attacked her and attempted to
5 rape her. See my 5/1/92 report, Exhibit C.

6 12. On 3/24/92 the mother signed an agreement (Exhibit D) agreeing to
7 family counselling, especially for Justin and Rosemary. I also got her to agree
8 to "no contact" between Mark Martin and the children.

9 13. On 4/29/92, I met with Rosemary who told me that she had seen Mark
10 Martin last Saturday. She did not talk with him, but her mother did. This
11 statement was right on the heels of assurances from the mother that she had not
12 seen Mark Martin since January. See my entire report of 4/29/92, Exhibit E.

13 14. In this interview, the mother acknowledged that she had previously
14 walked in on Mark Martin fondling Rosemary about three years before when the
15 child was 7. No report was ever made to CPS, and the mother seems unconcerned
16 about the incident. At the time, Mark Martin was living in the house and he was
17 allowed to continue to live there.

18 15. Although the mother signed the 3/24/92 agreement regarding no contact
19 with Mark Martin, on 4/29/92 she acknowledged contact on the previous Saturday,
20 but only after Rosemary admitted to the contact.

21 16. On 3/24/92, she signed the agreement to get the children into
22 counselling. As of the 4/29/92 conference, no counselling had been started.

23 17. On 5/1/92, I went to Seattle to visit the two older girls, Clare and
24 Madeline, in the father's home. I also met with his new wife, Donita. I am
25 attaching my reports on these visits as Exhibit F.

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18. They stated that the mother locks up the food and toilet paper, locks up the washer and dryer so they can't wash their clothes. Madeline stated that it is more peaceful at the father's house. She said that the mother was gone a lot and she had to watch the younger children and clean the house, and that she and Clare were deprived of food a lot.

19. Both girls stated that they wanted to stay with their father.

20. Clare told me that she was going to school regularly, had a job, and felt like she was "going somewhere," and "getting on with my life." She stated that she was very depressed when living with her mother, even suicidal.

21. Clare said that the father and step mom are willing to talk with her and listen to her.

22. Clare stated that shortly before she left the mother's home to live with the dad, she confronted her mother and said that she could not believe that the mother had allowed the abuse to happen, that she did nothing to stop it, and asked her mother if she loved Mark Martin more than she loved three of her daughters.

23. The files on this case show a family that has had a tortured history. No one gets out of this looking really good.

24. My recommendation is that the older girls be allowed to continue living with the father in the Seattle home. It is obvious that the situation in the mother's home is not workable.

25. As for the younger children, I have serious concerns about the mother's inability to deal with reality, especially with regard to Mark Martin. Whenever his name came up, she remained passive and seemingly unconcerned about

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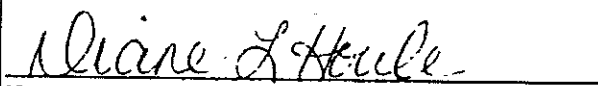
the past sexual abuse and what I perceive as the ongoing problem with probable contact with Mark Martin and the mother's obvious state of denial. She seems to be seeking opportunities to have contact with him.

26. I am not yet prepared to make a recommendation that the three younger children be removed from the mother's care. However, I intend to closely monitor the goings on in the home and am particularly concerned that the mother seems to have no interest in putting the children in counselling and/or seeking appropriate services/assistance for the children. I am even more concerned that Mark Martin is a continuing presence and an ongoing threat to the well being of these children.

DATED this 14th day of May, 1992.


MARK WIDAMAN

SUBSCRIBED AND SWORN TO before me on this 14th day of May, 1992.


Notary Public for the State of
Washington, residing at Seattle.
My commission expires 3-19-94.

FILED

95 APR 19 AM 10:53

Honorable Michael Hayden
Room W-382

KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA.

IN THE SUPERIOR COURT OF WASHINGTON, KING COUNTY

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

No. 93-2-25996-4

AFFIDAVIT OF
KIMBERLY A. KONAT

vs.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT EUGENE)
MANNs a/k/a ROBERT GENE)
MANN, an individual,)
Defendants.)

UNDER PENALTY OF PERJURY, under the laws of the State of
Washington, I, Kimberly A. Konat, swear that the following is
true and correct:

1. On March 1, 1995, I interviewed Diana Schuler, a former
member of Community Chapel and Bible Training Center, by
telephone. I believe that Diana Schuler will testify to the
following:

2. Ms. Schuler stopped attending Community Chapel in late
1987.

3. While at Community Chapel, Ms. Schuler knew Robert
Manns, his current wife Sharon Manns, and his former wife Aleta
Mann. Robert's name at the time was "Mann."

AFFIDAVIT OF KONAT RE: DIANA SCHULER - 1
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[Signature]

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1 4. Ms. Schuler and her children were physically abused by
2 her husband during the time the family attended Community Chapel.
3 Her husband was a bible college teacher at the church. Ms.
4 Schuler told pastor Don Barnett and two church leaders, Scott
5 Hartley and George Alberts, that her husband physically abused
6 her and their kids. The church spoke to Ms. Schuler's husband
7 about it, but refused to allow her to divorce him.

8 5. Even though the church knew of the constant and often
9 severe abuse, they received counseling from the church for eight
10 (8) years before the church allowed Ms. Schuler to divorce him.
11 The church forbade the Schulers from involving any outside
12 authorities in these matters.

13 6. The extent of Community Chapel's counsel to Ms. Schuler
14 about the abuse was that she should submit to her husband.

15 7. Robert Manns was verbally abusive to Aleta Mann and
16 their kids. He held tight control over the money, food, medical
17 treatment, and everything else.

18 8. Aleta Mann told Ms. Schuler that Robert Manns hit her
19 and hit her sons. Robert Manns spanked his sons so hard that he
20 left bruises on them. Ms. Schuler saw pictures of bruises on the
21 boys after Robert had beaten them. A report of the abuse was
22 filed with the Des Moines Police Department in 1985 or 1986.

23 9. Aleta told Ms. Schuler that she was afraid to leave her
24 sons alone with Robert, and later, when she fought to get
25 custody, Aleta told Ms. Schuler that she was terrified Robert
would get custody and would harm her sons.

AFFIDAVIT OF KONAT RE: DIANA SCHULER - 2
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10. Robert Manns denied medical attention to his family,
1 saying they should trust in God for healing.

2 11. It was generally known at Community Chapel that Robert
3 Manns was abusive to Aleta and their sons. The church counselors
4 knew about the abuse because Robert and Aleta Manns were in
5 counseling for quite some time.

6 12. Aleta told Ms. Schuler that the church counselors wrote
7 off the abuse because Aleta was not "walking with God" and Robert
8 appeared to be faithful.

9 13. Sharon Manns (then Sharon Gordon) and Robert Manns were
10 spiritual connections and had an affair. Sharon Manns told Ms.
11 Schuler that she and Robert had sex in the upper rooms of
12 Community Chapel from 1984 through 1987. Sharon Mann also told
13 Ms. Schuler about a room at the top of the Education Building at
14 Community Chapel where an elite group would meet and would all
15 have sex with their spiritual connections in a dark room.

16 14. Ms. Schuler saw Sharon Manns physically abuse Robert
17 Manns. She poured hot and cold water on him, plucked his pubic
18 hair, pulled his pants down, and put ice down his pants. All of
19 this was in the name of God to rid him of demons. Sharon Manns
20 humiliated Robert Manns all of the time by making remarks about
21 his genitals, hair, teeth, and complexion.

22 15. Ms. Schuler also saw Robert Manns beat Sharon Manns.
23 Sharon also told Ms. Schuler of times when Robert beat her.
24 Robert sometimes helped Sharon beat Jeanne Blalock, Jeanne's
25 kids, Ms. Schuler's kids, Ms. Schuler, Sharon's kids, and

AFFIDAVIT OF KONAT RE: DIANA SCHULER - 3
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Robert's kids.

1 16. Sharon Manns physically abused Robert Manns, Jeanne
2 Blalock, the eight kids, and Ms. Schuler, all the while claiming
3 that we had demons and needed the beatings. Sharon Manns also
4 humiliated all of them in public places.

5 17. Sharon Manns was afraid that Robert Manns would rape
6 and harm her girls to get back at her for abusing him. Robert
7 Manns confessed to raping Sharon's daughters and said that he
8 wanted to kill them and hide their bodies in a refrigerator.

9 18. One time, Sharon Mann beat one of Jeanne Blalock's sons
10 so badly that he went into shock. Sharon Manns then made them
11 leave him with Ms. Schuler's daughter, who was also a minor. She
12 made Ms. Blalock and Ms. Schuler go out to dinner with her. Ms.
13 Schuler and Ms. Blalock were afraid to go home because they
14 thought Jeanne's son would be dead. When they said this to
15 Sharon, Sharon said that they would just barbecue him and eat him
16 for dinner.

17 19. Sharon, sometimes with the help of Robert, also
18 tortured Robert Manns' kids. They were careful to use torture
19 that would not leave bruises so that their mother, Aleta, would
20 not see the bruises. Sharon had Jeanne, sometimes Robert, and
21 Ms. Schuler, hold Robert's sons down while she poured hot and
22 cold water on them. Sharon believed one of Robert's children,
23 who was physically disabled, had a demon of crooked fingers and
24 tortured him to rid him of the demon. Of course, his fingers
25 remained crooked.

AFFIDAVIT OF KONAT RE: DIANA SCHULER - 4
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1 20. Eventually, Jeanne, Robert Manns, and Ms. Schuler
2 kidnapped Sharon Manns and locked her in Ms. Schuler's basement
3 for approximately one month. Jeanne Blalock and Ms. Schuler
4 verbally abused her during this time. Robert Mann physically and
5 sexually abused her. Mr. Manns hit her with a broomstick and
6 forced her to perform sexually for him.

7 21. In 1988, Sharon told Ms. Schuler that God revealed to
8 her that her husband raped her daughters. Sharon made her
9 daughters tell Ms. Schuler that their father raped them. Later,
10 her girls told Ms. Schuler that Sharon made them say that and
11 that it wasn't true. After they revealed this information to Ms.
12 Schuler, Sharon's daughters were afraid to go back to her. Ms.
13 Schuler arranged to give the kids to their father and Sharon's
14 former husband, Greg Gordon. Sharon and Robert Manns came to Ms.
15 Schuler's house and stood outside yelling and screaming about her
16 daughters. Robert Manns tried to kick the door down. The kids
17 were in Ms. Schuler's house. The police came and Robert and
18 Sharon left.

19 22. Ms. Schuler knew that a lot of men at Community Chapel
20 abuse their wives and children. She knows of many women who were
21 abused. The church did not believe the wives and said that they
22 were being abused because they were not being submissive to their
23 husbands.

24 23. Kirsten Miller, for example, was beaten and raped by
25 her husband, Bill. Darlene Wagenius was abused by her husband.

24 24. Zeke Rice was a Sunday School teacher at Community

AFFIDAVIT OF KONAT RE: DIANA SCHULER - 5
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1 Chapel who abused the children in his Sunday School class. Rick
2 Cole was the youth minister and later a school teacher who
3 sexually abused several boys at the church.

4 DATED this 26th day of March, 1995.

5 Kimberly A. Konat
6 Kimberly A. Konat

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AFFIDAVIT OF KONAT RE: DIANA SCHULER - 6
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95 APR 19 AM 10:52

Honorable Michael Hayden
Room W-382

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SEATTLE, WA.

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IN THE SUPERIOR COURT OF WASHINGTON, KING COUNTY

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

No. 93-2-25996-4

Plaintiffs,)

AFFIDAVIT OF LESLIE R. SHELBY

vs.)

COMMUNITY CHAPEL AND BIBLE)
TRAINING CENTER; ROBERT EUGENE)
MANNs a/k/a ROBERT GENE)
MANNs,)

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

2. I am one of the legal assistants assigned to the above-
referenced matter. I interviewed Aleta Marie Mann, by telephone
on October 28, 1994. I believe that Ms. Mann will testify to the
following:

3. Ms. Mann was formerly married to Robert Eugene Mann, one
of the defendant's in this matter. Robert Manns and Aleta were

AFFIDAVIT OF LESLIE R. SHELBY
RE: ALETA MANN - 1

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1 married during the time that Robert Manns attended Community
2 Chapel and Bible Training Center.

3 4. Robert and Aleta Mann have two sons, ages 13 and 16.
4 Ms. Mann has custody of their sons and they reside with her, in
5 Ohio.

6 5. Aleta Mann was a member of Community Chapel and Bible
7 Training Center from 1975 to 1977. She resumed attending
8 Community Chapel in 1979 and left the Chapel in 1986.

9 6. Both of her sons attended Community Chapel's Christian
10 school and Sunday school.

11 7. Aleta Mann separated from Robert Mann in July 1987 and
12 filed for divorce in February 1988.

13 8. During the Mann marriage and separation Robert Mann
14 physically and mentally abused their children and mentally abused
15 Aleta Mann. Ms. Mann was so afraid of Robert Mann's abuse that
16 she obtained a restraining order against him during the pendency
17 of their divorce.

18 9. The Kent office of Child Protective Services and the
19 Kent Police Department investigated allegations that Robert Mann
20 abused their children and there are reports of this with these
21 agencies.

22 10. In late 1988, Robert Mann pled guilty to domestic
23 violence charges and was sentenced to six months probation.

24 11. As part of the Mann dissolution proceedings, Robert and
25 Aleta Mann attempted mediation.

12. Robert Mann's physical abuse of their children was at

AFFIDAVIT OF LESLIE R. SHELBY
RE: ALETA MANN - 2

1 issue in the dissolution and custody proceedings. An
2 investigation was conducted by Family Court Services.

3 13. In March of 1991, Robert Mann beat their sons
4 violently. He threw the boys into walls and banged their heads
5 against the floor. One of the boys was knocked unconscious by
6 Robert.

7 14. Robert raised bloody welts all over the boys' bodies by
8 beating them.

9 15. When Jesse Mann was six years old, Robert held him down
10 and forced water down his throat, claiming that Jesse had
11 "demons."

12 16. On a few occasions, during the Mann marriage, Ms. Mann
13 was told by neighbors that her sons were outside in the cold and
14 rain while Robert Mann was inside the house with Sharon, his then
15 spiritual connection and current wife.

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

21 18. During the time of the Mann divorce proceedings, Sharon
22 Mann, and Robert Mann tried to brainwash the children and
23 convince them that Robert Mann never beat them.

24 19. Sharon Mann also forced Robert's son, Brian Mann, to
25 write a letter saying that he lied about his father beating him
and that he wished to live with his father.

AFFIDAVIT OF LESLIE R. SHELBY
RE: ALETA MANN - 3

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1 20. While a member of Community Chapel, Aleta Mann spoke
2 with more than one Church counselor on more than one occasion,
3 regarding Robert's physical abuse of their children.

4 21. One counselor Ms. Mann called regarding Robert's
5 physical abuse, said that he would talk to Robert about his
6 abusive behavior. However, to Ms. Mann's knowledge no one talked
7 with Robert, or intervened on her behalf, regarding his abuse.

8 22. Ms. Mann was told, by the Church, not to go to CPS or
9 any other agencies outside of the Church.

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

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

21 25. Ms. Mann does not want to believe that the man she was
22 married to would sexually abuse anyone, however, it would not
23 surprise her to discover that he had molested a child.

24 26. Ms. Mann has asked both of her sons whether they were
25 sexually abused and they have denied being sexually abused.

26 27. Robert Mann was subjected to a lot of abuse while

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RE: ALETA MANN - 4

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1 growing up. Robert was sexually abused as a child and Ms. Mann
2 has felt that Robert Mann was strange in a way that she cannot
3 describe.

4 28. Robert and Aleta Mann's sons have told Ms. Mann that
5 while staying with their father they have awakened to find Sharon
6 Mann in their bedrooms very late at night.

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

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

14 31. Ms. Mann recalled allegations and suspicion that Sharon
15 Mann had molested Jeanne White's son.

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

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

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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 Ms. Mann recalls
7 that there were a lot of "spiritual connection" relationships
8 between children and adults. As Ms. Mann recalled, the Church's
9 only directive regarding adult/child spiritual connections was to
10 keep it in the open. There were people cuddled-up in the
11 hallways at the Chapel all the time, and everyone, including
12 children, witnessed intimacy and cuddling between spiritual
13 connection couples.

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

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1 expressed her desire that Sharon not sit with the Mann family
2 during Church. Ms. Mann believes someone in the Church spoke
3 with Sharon and asked her not to sit with the Mann family during
4 Church services. Sharon then began sitting directly behind
5 Robert and Aleta Mann during services.

6 36. Ms. Mann went to see a Church counselor regarding her
7 negative feelings about spiritual connections. The counselor
8 told her that she had not experienced spiritual connections so
9 she didn't know what they were like or what they were about. The
10 counselor's advice to Ms. Mann was to "go with the flow."

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

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

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RE: ALETA MANN - 7

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1 39. Everything in Community Chapel was secretive. During
2 the time that Ms. Mann was attending the Church, the members
3 learned that the Church was paying for abortions when the Church
4 preached pro-life. The Church taught that Christ deceived, and
5 Ms. Mann believes that the Church taught this to justify its own
6 deceptive behavior. The Church counselors liked to keep things
7 under wraps and not tell Church members about things that were
8 going on. At one point, Robert Mann was in training to become a
9 counselor. Ms. Mann did not know this until she discovered his
10 notes from classes or training sessions for Church counselors.
11 Ms. Mann recalls thinking that what he had in his notes was
12 totally different from what was preached from the pulpit.

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

20 41. Ms. Mann recalled that one elder, who was either
21 disfellowshipped or left the Church, began to send letters to
22 current members of the Chapel saying that spiritual connections
23 were not of God and telling what the pastor and the Church were
24 really up to. The members were told not to read any mail from
25 dissenters of this sort. They were told to have no contact with
the sinners who were kicked out. They were told not to read

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newspapers or open any mail from those who were disfellowshipped.

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

10 43. Ms. Mann describes Robert Manns as authoritative and
11 overbearing. While they were married, Robert Manns insisted that
12 there was a right way to do things and that was his way. He
13 often threw temper tantrums when he did not get his way.

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

23 45. Robert's voice would get falsetto when praying, he
24 would sway and cry, among other behaviors, while he was praying
25 in the Chapel. When Robert was "in the spirit," he would laugh

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RE: ALETA MANN - 9

1 and giggle and skip in the Chapel. A friend, Jerry Brenstrom,
2 asked Ms. Mann if Robert was on drugs. More than one person
3 asked Ms. Mann if Robert Mann was gay, because of mannerisms like
4 flipping his hand and the way he would flirt in a feminine
5 manner. People thought that Robert Mann was weird.

6 46. Robert Mann is a habitual liar, Ms. Mann said he would
7 lie all the time about anything and everything.

8 47. Robert had married Sharon Mann during one of they
9 Mann's custody actions and did not tell Ms. Mann, his own
10 attorney, or the Court of his marriage. Instead, Robert told
11 everyone that Sharon was his girlfriend.

12 48. Robert believed that demons dwelt in people, and at one
13 point during Robert and Aleta's marriage, Robert Mann accused Ms.
14 Mann of "fucking" demons.

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

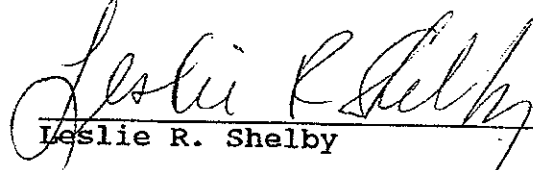
23 50. Ms. Mann believes that Robert Mann has the money to
24 hire an attorney to represent him in this matter. Ms. Mann
25 believes that he will delay obtaining an attorney until the very
last minute, then hire an attorney in the eleventh hour in order

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1 to delay the action. Ms. Mann said that Robert Mann used the
2 same tactics during their Family Law court actions.

3 DATED this 27th day of March, 1995.

4 
5 _____
6 Leslie R. Shelby

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AFFIDAVIT OF LESLIE R. SHELBY
RE: ALETA MANN - 11

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REPORT OF FIRST COUNSELING SESSION

STATE'S EXHIBIT 7
Withdrawn

Date of session _____

Counselee's name(s) JENIFER KONOPKA

Counselor's name(s) SUSAN TOWERY

K
congregational member

- 1. Has this person had counsel previously through our church on this subject?
 yes no List previous counselors.
 ALTHOUGH HAS GONE TO THE DELIVERANCE ROOM
- 2. Has this person had counsel previously on other subjects? yes no
 List previous counselors.
- 3. If he has had different counselor(s) for this subject, why has he changed?
 (Give reason for each change.)

4. Nature of the problem(s) DEMONS IN BED ROOM

Key elements (please number):

- 1. SHE SAW FUNNY FACES ON HER WALL
- 2. HEARD CRACKING NOISES FROM THE FLOOR
- 3. IN GENERAL - A VERY DEMOND MINDED LITTLE GIRL. SHE WAS THE ONE WHO FELT THERE WERE DEMONDS IN HER ROOM.

5. Counsel given: standard

Key elements (with qualifications, please number):

- 1. DEMONSTRATED WHAT HER IMAGINATION WAS BY TAKIN HER ON A WALK W/ LOTS OF DETAIL
- 2. EXPLAINED HOW LIGHT CASTS SHADOW ON WALLS
- 3. "MAKES BOARDS" A HOUSE SETTLES + HEAT + COOLING EXPAND + CONTRACT

6. Other information: ^{4. JUST GAZED} HER IN A GOD CONSCIOUS DIRECTION -

- WE DON'T HAVE TO BE AFRAID - THEN SANG SOME FAITH SONGS
- 5. WE DID PRAY
- 6. KATHY HARRINGTON USE TO TELL THE KIDS DEMON STORIES

7. Did you make another appointment? yes no Date _____

8. If you checked "no" in number 7, what are your plans for follow-up?

- none necessary. I WILL CALL HER MOM + SEE HOW THINGS ARE

100782

EXHIBIT
E

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 composed thereof,

Defendants.

NO. 93-2-25996-4

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

Appearances

For the Plaintiff:

KIMBERLY KONAT
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 II of the deposition
of RONALD ENROTH, Ph.D. was taken in the above cause on the
25th 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 RONALD ENROTH, Ph.D., having previously been duly sworn on
2 oath by the notary, was deposed and testified as follows:
3

4 E X A M I N A T I O N (CONTINUING)

5 BY MR. ROHAN:

6 Q Sir, are you aware of a journal entitled Sociological
7 Analysis, a journal in the sociology of religion?

8 A Yes.

9 Q And is that aligned with any particular religious group
10 or denomination?

11 A I believe that's the one that's published by the, and
12 you can refresh my memory for me, by the association
13 The Sociology of Religion. They changed their name.
14 Originally it was associated with or came out of the
15 Roman Catholic Church or it was essentially a Roman
16 Catholic publication and then the name was changed a
17 number of years ago so now it has no affiliation with
18 the Catholic Church or any other church.

19 Q Is it a peer review journal?

20 A Yes.

21 Q Is it respected in the field of sociology?

22 A It's very small but, yes, it's respected.

23 Q And it's correct, is it not, that they reviewed your
24 book The Lure of the Cults in New Religions?

25 A It could be, I don't recall.

R. Enroth, Ph.D. (By Mr. Rohan)

1 Q Do you know a William H. Norman from Graceland College?

2 A No.

3 (Exhibit No. 123 marked for identification.)

4 Q Showing you what's been marked as Exhibit 123, starting
5 on the second page, which is 453, entitled "Book
6 Reviews", is that a review of your book The Lure of
7 Cults in New Religion?

8 A Yes.

9 Q And then on page 455, what's numbered 455, it would be
10 the third page of the exhibit, it states, "The Enroth
11 book, on the other hand, contains little to recommend
12 it as a serious piece of scholarship", do you see that?

13 A Not yet, sir.

14 Q It's the second paragraph.

15 A Oh, on 455, excuse me. Yes, I have it.

16 Q Are there any other reviews that also have described
17 any of your writings as not being a serious piece of
18 scholarship?

19 A I can't recall right now.

20 Q And in the next sentence or the next sentence says the
21 book is polemic, but the one after that says, "It aims
22 not to provide a better understanding of doctrine
23 or dynamics but rather to identify the errors and
24 evils of new religions from the author's own religious
25 perspective (which he refers to as 'evangelical

1 apostates. That is very narrowly defined as someone
2 who has been adjudged to be heretical. I do not use
3 the word apostate, I use the term ex-member. So, I
4 would disagree with his characterization of my
5 respondents.

6 Q Do you accept uncritically what ex-members tell you, at
7 least in terms of your book The Lure of Cults in New
8 Religions?

9 A I take them at their word and I look for patterns and
10 independent verification, but when one engages in
11 behavioral science research, one receives testimony of
12 life histories without any kind of modification or
13 adjustment on the part of researcher. In other words,
14 I received their reports as they give them to me and in
15 that sense uncritically.

16 Q If you receive reports from ex-members that were
17 prepared by the ex-member's lawyers, do you think those
18 have the same degree of reliability as reports of
19 interviews that you do in person?

20 A I probably would not accept reports that were prepared
21 by their attorneys, I would rather interview them
22 directly without a third party.

23 Q And if former members or parishioners of a group
24 reported to you what they think what somebody else
25 reported to them, so it's not their firsthand

1 experience but they're saying, well, X told me that
2 so-and-so and such and such happened, would you find
3 that report reliable?

4 A I would accept it at face value as they report it and
5 as their perception of what was told to them and would
6 try to get independent verification from others.

7 Q That's all the questions I have for that exhibit.

8 (Exhibit No. 124 marked for identification.)

9 Showing you what's been marked as Exhibit 124, is that
10 a copy of a draft of an affidavit in this case?

11 A Yes, it is.

12 Q And I understand that there may be minor changes in
13 spelling, punctuation, and perhaps certain words here
14 and there before that went into the final; is that
15 correct?

16 A Yes.

17 Q If you recall any of those as we go through the
18 document, could I ask you to point those out to me?

19 A Yes.

20 Q And what I'd like to do is also get out Exhibit 121
21 that we had been going over at length yesterday, to the
22 extent that some of the material in your affidavit is
23 the same, I don't think we need to go over that again.
24 When you talk about in paragraph 1, and I'm going to
25 refer to your affidavit as an affidavit and the earlier

1 in the areas of sexuality and relating to persons of
2 the opposite sex. They will have learned practices
3 that the larger society may regard as bizarre and
4 non-normative. At the least, this will make them
5 uncomfortable and uncertain".

6 When you say they undoubtedly will face
7 extraordinary adjustment problems in the areas of
8 sexuality and relating to persons of the opposite sex,
9 does that refer to all children that were at Community
10 Chapel?

11 A It probably would be better worded that they probably
12 will face or the probability is that they will face
13 extraordinary adjustment problems. I'm not testifying
14 that every single child, including those I'm not
15 familiar with, would face extraordinary adjustment
16 problems, I'm basing this, again, on the material we
17 have already gone over, my interaction with the
18 ex-members, as well as the comments of Dr. Penner and
19 the public school individuals that we referenced
20 yesterday in the Christianity Today article.

21 Q Have you talked to any children from Community Chapel?

22 A No, I have not, I have not.

23 Q If you're a sociologist dealing with the effect of
24 something on children, wouldn't sociological methods
25 suggest that you interview children or former children?