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DIRECT EXAMINATION

BY MR. REARDON:

Q. Ms. Peralta, before the lunch break I believe we were -- I was directing you to a number of meetings. I am going to direct you back to those meetings and after the Byron decision. You understand where we are at the time back at the ranch?

A. I do.

Q. You testified one meeting where Mr. Turner's name came up. To your recollection this was, I believe, the second meeting. I'm going to direct your attention to that. Is that correct?

A. That is correct.

MR. WEATHERHEAD: Objection to the form of the question and not consistent with the witness' closing words when we adjourned for lunch.

THE COURT: Start with a new question.

Q. (By Mr. Reardon) Directing your attention to the second meeting, do you recall who was in attendance and where it took place?

A. Yes. It took place in Sheela's bedroom. And there were more people in the second meeting.

Q. I want you to the best of your recollection today to tell the ladies and gentlemen who was at that meeting.

A. Okay. Leading the meeting was Sheela. As well as

1 Sheela was Prem Savita, Yoga Vidya, myself, Ava, Anugiten,
2 Krishna Deva, Padma, Su, Homa, Shanti Bhadra, yes.

3 Q. And during that particular meeting what, if any,
4 reference was made to Charles Turner?

5 A. Charles Turner was mentioned as the person most
6 damaging or most threatening to the ranch, to our community.
7 And he was put at the top. He was put as the number one
8 target for assassination at the top of a list that was
9 discussed in that meeting on that evening.

10 Q. And what was discussed in regard to Mr. Turner?

11 A. The discussion went -- the discussion, how come I
12 remember it has to do with what Bhagwan told Sheela which
13 Sheela related to us --

14 Q. What was that?

15 A. -- at the first meeting, which was -- which I have
16 already talked about Sheela went and then spoke with
17 Bhagwan.

18 Bhagwan allegedly told Sheela if one
19 person -- if just one person had killed Hitler, then six
20 million people would be alive now. So again that's like
21 throwing fuel on the fire. It was for me. So at that time
22 that made sense for me, you know.

23 So what she did was, well, there are people
24 standing in the way of our commune. And there are people
25 that are purposefully and maliciously out to hurt our

1 commune, to hurt where we lived, to hurt this thing here we
2 built. And most of all to remove this teacher who I
3 personally dearly, dearly valued, loved.

4 So then came the discussion of which names
5 would go on that list. Who were the people that were --

6 Q. Direct your attention to Mr. Turner. You understand
7 that?

8 A. Mr. Turner ended up being the most important one. The
9 one that we felt -- the one that as I was sitting at that
10 meeting and we were together discussing what we felt would
11 be the most standing in the way, the most threatened, the
12 biggest threat to the ranch.

13 Q. Why was he a threat to the ranch, if you know?

14 A. Because he was heading the INS investigation. And his
15 investigation was a very serious investigation. I remember
16 feeling that evening in that room was very serious about
17 the fact that he could remove Bhagwan from the United
18 States and possibly have Bhagwan arrested.

19 Q. What would that have done to the commune?

20 A. It would have destroyed the commune overnight. If
21 Bhagwan was arrested, charged, taken out of the country,
22 you know.

23 Q. And when you say "we," once again when you say "we,"
24 who is "we," "we" discussed?

25 A. The names I just mentioned that was sitting in that

1 mighting on that evening. There could have been others.
2 Those were the people that I remembered.

3 Q. What, if any, reaction was there to what Sheela had
4 said by those there?

5 A. There was an agreement by everyone in the room that
6 this was correct, that Charles Turner was going to be the
7 number one target of assassination. And we were on the
8 correct track. There was no dissent.

9 Q. Was there anything said in regard to how it was to be
10 done, which instrumentality?

11 A. That evening, no.

12 Q. Did there come a time when there was such a
13 discussion?

14 A. Yes.

15 Q. And before we leave the meeting about which you are
16 testifying now, was there any discussion about individuals
17 in terms of a particularized team at that particular
18 meeting?

19 A. I don't know.

20 Q. Did there come a time when there was another meeting
21 in which instrumentalities and team were discussed?

22 A. There came one very big meeting and thereafter then
23 came others, smaller meetings where positions were
24 assigned. So the first -- the next meeting that followed
25 then had to do with directly how we could go about doing

1 that and what that would mean, what kind of weapons would
2 be required, and used, right. So --

3 Q. At this next meeting who -- first of all, where was it
4 held?

5 A. It was held in Sheela's bedroom.

6 Q. Incidentally, as you describe meetings, describe how
7 this meeting would occur. How were you summoned to this
8 particular meeting, if you recall?

9 A. It isn't so much a question of being summoned. At
10 that point those of us who were especially in this inner
11 core of people were very active the moments, the major
12 moments of the ranch. It wasn't that we were summoned.
13 Just simply that we were there a lot. So --

14 Q. What does "there" mean?

15 A. That we were in Sheela's bedroom participating in
16 various kinds of meetings, that meaning all the way from
17 running the ranch and taking care of normal day-to-day
18 stuff as well as other activities, as well as that
19 activity, that specific one that handled talking about the
20 assassination of Charles Turner.

21 That morning, because this happened in the
22 morning time, I came to Jesus Grove and went directly into
23 Sheela's bedroom. And standing in Sheela's bedroom was
24 Ava, Shanti Bhadra, Savita, Su, Sheela, Padma, Puja, and
25 then one or two others. But they would only have been from

1 this particular group of people who knew. And on that
2 morning --

3 Q. What happened?

4 A. On that morning, the discussion came up as to which
5 weapon would be useful. So we went directly to talking
6 about hand weapons, pistols.

7 Q. Each time you say "we," I must ask you who "we" means
8 so the record is clear.

9 A. We --

10 Q. Let me finish my question so Mr. Stimler can take this
11 all down correctly. Thank you.

12 To whom do you refer when you say "we" this
13 last answer you gave?

14 A. I'm referring to the very last names that I mentioned,
15 which --

16 Q. What discussion was had?

17 A. The discussion was which weapons would be appropriate
18 ones to use in the assassination of Mr. Turner, and also
19 regarding other names on that list.

20 Q. With regard to Mr. Turner, in regard to what weapons
21 were to be used, what do you recall of that conversation?

22 A. I recall that the people on that list that I have just
23 given discussed that we could not use the weapons that we
24 had on the ranch. We had an arsenal of weapons on the
25 ranch. They were all registered. They had been correctly

1 and legally bought. So we then discussed which weapons,
2 what kind of weapons, where could we get them.

3 We realized -- when I say "realized," I am
4 mentioning especially those people that I have put on that
5 list -- that we would have to buy illegal weapons. And
6 that would involve people going to do this. That would
7 involve some sort of way to get these weapons.

8 Q. And was there further discussion of how these weapons
9 were to be obtained at that time?

10 A. The first thing that happened was Shanti Bhadra was
11 either there -- Sheela mentioned Shanti Bhadra can go but
12 others in the group I cannot remember said Shanti Bhadra is
13 not an American, it would be very, very good if an American
14 went with her.

15 Q. Did you learn an American did go with her?

16 A. Yes.

17 Q. Who?

18 A. Ms. Caldwell.

19 Q. What is her sannyasin name?

20 A. Ma Deva Rikta.

21 Q. And do you recall where the guns were to be purchased?

22 A. No. It's not that was planned beforehand. Myself and
23 Shanti Bhadra made that plan after they met with each
24 other. They talked with each other. I knew about that
25 afterwards.

1 Q. In regard to, if any, surveillance, was there any
2 discussion?

3 A. Yes. At that point we discussed that Ava and I would
4 surveil and Samadhi would be along as well.

5 Q. Did there come a time when there was discussion of an
6 actual assassination team?

7 A. Not at that meeting.

8 Q. Did there come a time when there was another meeting
9 when that was discussed?

10 A. Yes.

11 Q. And how long after the meeting about which you are
12 just testifying did such a meeting take place, to the best
13 of your recollection?

14 A. That happen directly thereafter. And that meeting, at
15 that meeting Ava was there, I was there, Savita was there,
16 Sheela was there, Shanti Bhadra was there, and Puja. It
17 was a very small meeting. It was in Sheela's bedroom. It
18 was also during the morning time.

19 Sheela stood up and said, "Savita, we have
20 to arrange money and false passports for these people when
21 they need to leave the country."

22 Q. And what happened? What, if any, response was made by
23 Savita?

24 A. Savita assented. She said, "Yes, that is clear. I
25 will do -- I will get it together." And from that point on

1 we kept our bags -- we had little bags packed. At least I
2 had a little bag packed.

3 Q. Was it a question of the amount of money that was
4 necessary, was that raised?

5 A. Sheela alluded to \$10,000 and false ID.

6 Q. Now, did there come a time thereafter -- incidentally,
7 were there other meetings that during which the same topics
8 were discussed; guns, surveillance, that of Mr. Turner --

9 A. Yes.

10 Q. -- during this time?

11 A. Yes.

12 Q. Did there come a time thereafter this last meeting
13 about which you just testified, to the best of your
14 recollection, when you were ordered to go someplace, to
15 another city?

16 A. Directly thereafter Su talked to me and said, "You go
17 and join Ava in Portland." She was having a hard time.
18 She could use some companionship.

19 Q. And did you go?

20 A. Yes.

21 Q. Incidentally, did you respond to her when she said
22 that to you?

23 A. No. Su said that, I went.

24 Q. How did you get there?

25 A. I drove.

1 Q. By yourself or with another?

2 A. No. I did not drive. I flew.

3 Q. How did you fly?

4 A. I flew with one of the airplanes that we own at the
5 commune.

6 Q. And who was with you, if anyone, other than the pilot?

7 A. There were other passengers in the airplane and I
8 went -- there were other people from the commune flying to
9 Portland.

10 Q. Anybody going there for the same purpose you were, to
11 your knowledge?

12 A. I was going there to join Ava. Nobody else was on
13 that plane that was going to join Ava. The other ones were
14 to do commune affairs.

15 Q. When you came to Portland and you got off the plane,
16 where did you go first?

17 A. Ava met me.

18 Q. And where did you go?

19 A. We went to the undercover apartment that we had in
20 Portland.

21 Q. How did you get there?

22 A. Ava drove.

23 Q. What was she driving, if you recall?

24 A. She was driving an undercover car.

25 Q. What does that mean?

1 A. And undercover car were cars that were bought
2 specifically for --

3 Q. Let me ask you something. Describe a particular car
4 rather than generic. Describe the car. Do you know what
5 make it was?

6 A. I don't remember.

7 Q. Do you know what color it was?

8 A. No.

9 Q. Anyone else with you and Ava?

10 A. No. Just Ava and me driving.

11 Q. Where was this apartment that you went?

12 A. The apartment was in the older part of Portland.

13 Q. Did you know the name of it? Do you recall the name
14 of it?

15 A. The name of the apartment or the street?

16 Q. The name of the apartment.

17 A. No.

18 Q. Name of the street?

19 A. No.

20 Q. What part of Portland, do you know?

21 A. It was the old part of Portland. I would find it
22 again, it's -- there is the newer parts of Portland and
23 there it's like -- I would find it again. I just don't
24 know the streets.

25 Q. All right. When you went there, had you been there

1 before? Yes or no.

2 A. Yes.

3 Q. And when you went there and arrived, was anyone else
4 there in the apartment?

5 A. Samadhi was there. Shanti Bhadra came. Either she
6 was there when I got there or she came shortly thereafter.
7 She was also there.

8 Q. And can you fix this in any time for the ladies and
9 gentlemen of the jury in terms of time or events with parts
10 of the year? What part of 1985 this was?

11 A. This happened in late May. It happened in late May,
12 middle of June, somewhere in that time frame. More likely
13 early June, more toward that.

14 Q. Do you recall a press conference in which you can
15 place your time coming to Portland?

16 MR. WEATHERHEAD: Objection. Leading, Your
17 Honor.

18 MR. REARDON: I could have said a date properly.

19 THE COURT: Overruled. Go ahead.

20 Q. (By Mr. Reardon) Was there any particular press
21 conference that was public?

22 A. There was a press conference.

23 Q. Whose press conference was it?

24 A. We had the Rajneeshees, certain people were assigned
25 to be in a press conference to give particular statements.

1 At that point I cannot tell you what those statements have
2 to do with. I just know that the lead service Ma Yoga
3 Vidya was there giving a press statement.

4 Q. When you say "there," where do you mean where it was?

5 A. In the Portland Hotel.

6 Q. And was this on or about the same day as you got
7 there? Can you put it in context for the ladies and
8 gentlemen of the jury?

9 A. It was on or about the same day as that conference.

10 Q. All right. Now, when you were in this apartment, what
11 discussion, if any, did you have about surveillance of
12 Mr. Turner?

13 A. We discussed where the assassination could take place.
14 "We" meaning Ava, Shanti Bhadra, Samadhi and myself, which
15 were the designated team, we were the designated team for
16 the assassination.

17 Q. And when had you been designated?

18 A. We had been designated at the ranch.

19 Q. By whom?

20 A. It was a general consensus. The direction came from
21 Sheela. And then this group of people that were at the
22 very, very upper top of giving direction at the ranch, they
23 also took part in this discussion.

24 So when I say "general consensus," there was
25 a certain group of people that say, "Yes, I feel this is

1 okay. Yes, this person can go. Yes, this would be the
2 assassination." However they would put it in their words.
3 There was assent there.

4 Q. Now, when you say "they," any time you say "they," I'm
5 obliged to ask you who. That is fair. You just can't say
6 "they." Who is "they"?

7 A. Aside from Shanti Bhadra, myself, Ava, not Samadhi so
8 much, but these three, Su, Savita, Sheela, Puja, Padma, and
9 Patipada.

10 Q. Okay.

11 A. This was the group of people that would somehow come
12 together and say, "Yes, this will be an appropriate group
13 of people to go."

14 Q. Now I'm going to direct your attention to the
15 conversation in the apartment in Portland that you just
16 described and ask you as a result of that conversation
17 what, if anything, did you do?

18 A. Samadhi had discovered by looking at voter
19 registration where Mr. Turner lived. Not only where he
20 lived, but what license plate was on his car and where he
21 parked his car. And what we decided was that we would
22 drive past Mr. Turner's house to see if that would be a
23 good place to assassinate him. And that is, we made this
24 plan that we would do that and we would then go to the
25 garage and then just see what possibilities there were.

1 Q. What garage?

2 A. The garage where Mr. Turner parked his car when he
3 comes to work, which is not very far from here.

4 Q. Who told you about that?

5 A. Samadhi.

6 Q. That was your source of knowledge about that; Samadhi?

7 A. Yes.

8 Q. And did there come a time when you actually did drive
9 to Mr. Turner's and drive to the courthouse?

10 A. There not only came one time, but we drove by
11 Mr. Turner's house at least twice. And for sure the area
12 around surrounding where he lived, we evaluated that at
13 least twice. And we drove by the garage and investigated
14 the garage personally, the four of us went and walked and
15 discussed how it would be possible if he drove his car in
16 that he open the door we would be able to shoot him.

17 The designated person to shoot him was
18 Shanti Bhadra. And the designated person to drive the car
19 would be me. The designated person to take care of other
20 kinds of things would be Ava, and Samadhi would be backup.

21 Q. Did there -- now, what did Shanti Bhadra, was she
22 selected to be the actual --

23 A. She was --

24 Q. Let me finish. Okay. Go slowly. When was she
25 selected, Shanti Bhadra?

1 A. What happened was that Samadhi had volunteered to
2 shoot Mr. Charles Turner. Samadhi had gone to Sheela and
3 asked if that was possible. And then when Ava picked me up
4 at the airport, Ava was very disturbed. She said to me,
5 "Yogini, that is not going to be possible because Samadhi
6 can only see out of one eye. She has to wear a contact
7 lens. The other eye is practically useless. She cannot
8 drive and she can't shoot guns. She was never a part of
9 the learning to shoot guns."

10 Thereupon, Ava talked with Sheela and we
11 with Susie about that.

12 MR. WAX: Objection. Move to strike. That would
13 be hearsay.

14 THE COURT: That would be hearsay.

15 MR. REARDON: This is in furtherance of the
16 conspiracy to pick out your shooter. This is right at the
17 heart stream of the co-conspirator exception.

18 THE COURT: Excuse me, just a minute.

19 Ladies and gentlemen, step out for a minute.

20 (The reporter read the pending question.)

21 MR. REARDON: Precisely answer to the question,
22 Your Honor. Goes directly to the hearsay exception.

23 THE COURT: Your point.

24 MR. WAX: That there is no foundation at this
25 point for that testimony. It is not rank hearsay as it's

1 come out.

2 MR. REARDON: We have a conspiracy already in the
3 record.

4 MR. WAX: Your Honor, I object.

5 THE COURT: That is not the question. That is
6 not the question.

7 MR. REARDON: Okay.

8 THE COURT: The question is that she is saying --

9 MR. WAX: Excuse me, may the witness be excused?

10 MR. REARDON: Yes. Can we have the witness
11 excused? Thank you.

12 MR. WAX: Sorry for the interruption.

13 THE COURT: You may be excused.

14 (Witness out)

15 THE COURT: The difference I see, Mr. Reardon, is
16 they witness is now not quoting what someone said. She
17 starts out, Ava spoke to Sheela about that. Now, you don't
18 have a foundation of whether she was there or whether this
19 is something that Ava reported to her, you see.

20 MR. REARDON: Sure. I can just ask a question
21 how did it happen that she became the shooter. The story,
22 of course, would be the same, that Susie was involved in
23 that process. That is prejudicial, of course, to Susie,
24 but it's not unduly prejudicial.

25 THE COURT: Well, I have heard Su's involvement

1 this time but not in relation to that particular statement
2 that was relating to Sheela.

3 MR. REARDON: I understand the question, sir.

4 THE COURT: Okay. Now -- so I'm going to sustain
5 the objection.

6 MR. REARDON: Okay, sir. I can ask it different.
7 Thank you.

8 THE COURT: Okay. Bring the witness back.

9 MR. GLICK: May we have a moment?

10 THE CLERK: You want the jury?

11 THE COURT: Not yet.

12 (Witness returns)

13 THE COURT: Bring the jury in.

14 (Jury in)

15 MR. REARDON:

16 THE COURT: Ladies and gentlemen, I sustain the
17 objection to the last portion of that answer and I strike
18 it. That is the portion which followed the statement
19 regarding the eyesight of Shanti Bhadra.

20 Samadhi, I'm sorry. The statement regarding
21 eyesight of Samadhi and the statement following that is
22 stricken.

23 MR. REARDON: Thank you, Your Honor.

24 Q. (By Mr. Reardon) In regard to the selection of
25 Shanti Bhadra as the shooter, what, if any, participation

1 in that selection did Su have?

2 A. What I learned came from Ava.

3 Q. And when did Ava tell you this?

4 A. At the apartment.

5 Q. At the apartment?

6 A. Yes.

7 Q. During this particular trip to Portland?

8 A. Yes.

9 Q. And what did she tell you?

10 A. Ava and I discussed -- Ava, by the time that we were
11 in the apartment again with Shanti Bhadra and with Ava and
12 Samadhi, we knew already that Shanti Bhadra was going to be
13 the shooter. They reason that we knew that, and in my
14 recollection now, Sheela was the one that said Shanti
15 Bhadra will be the shooter. So Sheela was the one to
16 assign her. This happened after Ava discussed that Samadhi
17 was not, yeah, not capable of being the shooter.

18 Q. And my question is, What, if any, part did Su, to your
19 knowledge, have in that selection process?

20 A. What Ava told me, was she was very disturbed about it.
21 She went and discussed this with Susie because we would
22 often discuss this with Susie.

23 Q. Who is Susie?

24 A. Su.

25 Q. Okay. Go ahead.

1 A. And Sheela. And thereafter, Sheela named Shanti
2 Bhadra as the shooter.

3 Q. I'm sorry. Forgive me please for interrupting.

4 A. I just wanted to say that Sheela assigned Shanti
5 Bhadra to be the shooter.

6 Q. I'm going to direct your attention to the first of the
7 two visits to Mr. Turner's home that you went on. I'm
8 going to ask, you who was on that first trip to
9 Mr. Turner's house?

10 A. On the first trip was myself, Ava, Shanti Bhadra, and
11 Samadhi.

12 Q. And on the way there, did you have any conversations
13 about Mr. Turner?

14 A. We discussed finding his house. I was driving. How
15 would that be, how we are going to find his house. And we
16 had an address and we were hoping that it would be correct,
17 that we would find it, just that kind of thing. What would
18 we find, what would the house look like. So when we did
19 drive to the house, that gave us a very clear picture of
20 what we could and couldn't do at his house.

21 Q. What does that mean?

22 A. What we decided was it would be impossible to do
23 anything to Mr. Turner in his house. For example, we
24 thought, Well, if he comes out of his house and we position
25 ourselves in a certain way, then we can shoot him. When we

1 got there, we realized that the house was back, that the
2 road leading to his house was only a two-way, one car can
3 go and the other car from the other direction. So there --
4 there -- there wasn't -- the road was not operable. We
5 felt the road was not operable. It was very small, not --
6 not a lot of sites headed off from it, so the possibility
7 of being seen as we drove the car down that road was very
8 great.

9 Also, Mr. Turner's house has a driveway
10 which kind of goes into his house and bushes there. We
11 felt that would then really obscure our view, so we drove
12 around a little bit and we realized there was a major
13 highway which he had to take and we thought, Well, that is
14 a possibility. But we discussed that later on another
15 visit to his -- to where he lives.

16 Q. Just restrict yourself to the first visit.

17 A. That was after the first visit. We looked around and
18 saw on the one side was a pasture, no houses on that side.
19 That was not such a bad point. So we evaluated what were
20 the good points and the bad points, and the bad points were
21 as I mentioned. The driveway to his house was not
22 operable. The street we had to drive on was not operable.

23 We would have to drive in front of other
24 houses facing that street, and there were no other side
25 streets to go off. Thereafter, we decided, Well, let's go

1 to the garage and see what is happening there. We didn't
2 feel very good about his house is the place.

3 Q. And did there come a time when you actually went to
4 the garage?

5 A. We did. We went --

6 Q. Incidentally, before you do that, let me ask you a
7 question. How did you find his house? How did you know it
8 was his house?

9 A. We had the address because Samadhi had provided it for
10 us from --

11 Q. Who provided it?

12 A. Samadhi.

13 Q. You will have to slow down again.

14 A. Okay.

15 Q. Take a deep breath and slow down. Who provided it?

16 A. Ma Prem Samadhi.

17 Q. How did she provide it, if you know?

18 A. She had somehow investigated voter registration, and
19 normally addresses are on voter registration cards. I'm
20 not sure how she went about that process, but that is what
21 she told us. So we knew his address and we looked on a map
22 and we found the street on the map and we just drove there.

23 Q. Okay. The visit to the garage, was that between the
24 first and second visits to the home of Mr. Turner?

25 A. Yes.

1 Q. And how did you find what you believed to be the
2 garage?

3 A. Samadhi had been conducting surveillance. She knew
4 that was the garage where he parked his car, and she knew
5 exactly which loft was allotted to his car.

6 Q. Is that what she told you?

7 A. Yes. Samadhi told me, told all four of us.

8 Q. Who is "four of us"?

9 A. Myself, Shanti Bhadra, Ava, and of course Samadhi
10 knew, and then on the second visit somebody else was with
11 us in the car.

12 Q. Was that somebody also present with you in the garage?

13 A. No. We drove by the garage with that somebody, but we
14 did not go in the garage.

15 Q. I'm just talking about the first trip to the garage.

16 A. The first trip to the garage was only the four.

17 Q. And what, if any, discussion did you have about
18 Mr. Turner being in that garage on that trip?

19 A. It was again reevaluating how that could be carried
20 out. So we left our car parked somewhere else far away
21 from the garage. We didn't want any possibility of a
22 tie-in. And we walked to the garage and we looked, and we
23 found a place where Mr. Turner parks his car. And we
24 looked at that. We looked at the angle so that -- we
25 talked about it. We felt that would be the place that

1 would be the best place.

2 At that time, that's what we felt because it
3 was an enclosed area and we felt we could leave very
4 quickly and someone could be downstairs waiting with the
5 getaway car. And that person, the shooter would get in the
6 car and we could drive away quickly. And we never stopped
7 to think that maybe he would be traveling with someone or
8 that maybe it wouldn't work.

9 That was something that just didn't occur to
10 us. We simply went ahead thinking, If we shoot him, he
11 will die, and then we will be finished and then we will
12 leave and we will go to the next part of whatever plan was
13 next.

14 Q. Now, let me ask you this. Before you went out to
15 the -- to Mr. Turner's house the second time with somebody
16 else. Incidentally, who was the somebody else, so we
17 aren't --

18 A. We picked up Ma Yoga Vidya.

19 Q. Before you went to the ranch -- before I ask the
20 circumstances surrounding your meeting with Vidya, let me
21 ask you this. Did there come a time before you went to the
22 ranch the second time that you got in contact with people
23 back at the ranch? Was there communication?

24 A. Ava called Susie and talked with Susie on the
25 telephone.

1 Q. How do you know that?

2 A. Well, two ways. The second way is very direct because
3 she told me that it was Susie on the telephone.

4 Q. Okay.

5 A. And the first way is Ava usually connected with one of
6 three people, and at the end it was usually one of two. So
7 these three people she usually connected with on the
8 telephone, that was kind of her job, was to call the ranch.
9 It was either Yoga Vidya or Prem Savita or Su.

10 MR. WEATHERHEAD: Move to strike the speculation,
11 Your Honor.

12 THE COURT: Sustained.

13 MR. REARDON: There was direct evidence.

14 THE COURT: Sustained.

15 MR. REARDON: The last question?

16 THE COURT: Yes.

17 MR. REARDON: All right.

18 Q. (By Mr. Reardon) But you were told directly from?

19 A. Ava.

20 Q. All right. Now, can you explain rather than saying
21 one of the three? That was objected to and sustained. You
22 understand that? "One of the three people." How did you
23 know that it was Su as opposed to Savita or Vidya?

24 MR. WEATHERHEAD: Objection, Your Honor.

25 Rephrases and answer as to which I believe the Court

1 ordered stricken.

2 MR. REARDON: Restated and refined so the witness
3 can testify from her personal knowledge.

4 THE COURT: Sustain the objection.

5 MR. REARDON: Thank you, Your Honor.

6 Q. (By Mr. Reardon) Did there come a time when you went
7 out to Mr. Turner's house for a second time?

8 A. We did.

9 Q. And did there come a time when you met Vidya before
10 you went out to the house a second time?

11 A. We did.

12 Q. Explain the circumstances surrounding your meeting
13 with Vidya?

14 A. Vidya was at that press conference, and we learned
15 that because Ava called the ranch and talked with Susie.
16 And Susie said to Ava, "Call Vidya. She is in town.
17 Maybe, you know, you guys can get together." This is what
18 Ava told me. Thereafter we called Vidya, Ava called Vidya
19 at the Portland hotel and asked --

20 Q. How did she know she was at the Portland hotel?

21 A. Because she was told by Susie, as I just said.

22 Q. What happened during that telephone call, if you know?

23 A. During that telephone call, Ava asked Vidya to join
24 us. Vidya said, "Fine." We arranged to meet her far away
25 from the hotel.

1 MR. WAX: Excuse me. Does the witness have
2 anything on the witness stand with her right now?

3 MR. REARDON: Do you have anything before you,
4 anything you are referring to? Are you looking at thing?

5 THE WITNESS: No.

6 MR. WAX: Thank you.

7 THE WITNESS: Glass of water. My hands.

8 (Last read.)

9 THE WITNESS: Vidya consented. She said okay.
10 Ava said, "Vidya is going to join us. She is going to go
11 out with us." So we arranged to meet her far away from the
12 hotel because we were dressed in blue. Normally we were
13 dressed in red. Everyone would know we were sannyasins.
14 It was conspicuous to have four people dressed in red
15 anywhere. We had a collection of blue clothes, ordinary
16 clothes, different colors.

17 Q. Blue clothes, didn't have to be blue?

18 A. No. They could be anything but red, pink, or purple.
19 So Vidya got in the car with us.

20 Ava said, "We are driving by Charlie
21 Turner's house." In fact, "Charlie Turner's house," like
22 that. "You want to come?" And Vidya said, "Yeah," exactly
23 like I'm saying it right now. "Yeah."

24 So we drove with Vidya in the car again one
25 more time by Mr. Turner's house and we went exactly the

1 same scenario we drove this here, and with Vidya we even
2 went down, like a little dust road that was somewhere in
3 that neighborhood. And Vidya also said, "No, this is not a
4 good idea." This is -- she agreed totally with us it would
5 not be a good place.

6 We told her about the garage. And on the
7 way back to bring her back to the Portland Hotel, we kind
8 of drove by, we drove by this garage and said --

9 Q. The same garage you were testifying to a little while
10 ago?

11 A. Yes.

12 Q. What happened during that drive?

13 A. We simply discussed it. We felt it would be a good
14 place.

15 Q. Who said what, to the best of your recollection?

16 A. I was in the car, Vidya was in the car, Ava was in the
17 car, Shanti Bhadra was, and I don't remember Samadhi was
18 with us or not at that time, whether there would have been
19 five people in that car or four.

20 Q. All right. Who said what?

21 A. Well, we together discussed collectively, "Yeah, this
22 is the garage. Vidso, what do you think?" You know, Vidya
23 says, That sounds --

24 Q. Who is Vidso?

25 A. Vidso was like a nickname. And she said, "Yes. I

1 think so." She agreed, completely agreed that the garage
2 sounded like the best place. Trusted us that we had gone
3 in there and looked, and that was that meeting.

4 Q. When you completed the second trip to Mr. Turner's
5 house, the garage trip was completed, then where did you
6 go?

7 A. I went back to the Portland Hotel dressed in red.

8 Q. And who went back to the Portland Hotel with you?

9 A. Samadhi.

10 Q. Then what did you do?

11 A. At that point we made the decision that we had done
12 the preliminary work towards realizing the plan and that
13 Ava and Shanti Bhadra would return to the ranch and inform
14 the others what the plan was looking like.

15 And I was -- I was asked, but I don't
16 remember now by whom, to stay with Samadhi. Samadhi
17 couldn't drive and I drove Samadhi around all night long.
18 At one point she put something in the mailbox. She didn't
19 tell me what it was. Letters of some sort. And that is
20 all we did. We drove around Portland forever.

21 Q. Did there come a time when you returned to the ranch?

22 A. Very shortly thereafter.

23 Q. Did there come a time when there was any meetings
24 about your surveillance after you got back to the ranch?

25 A. This inner circle, inner core people had already been

1 briefed as to the plan.

2 Q. How do you know that?

3 A. Ava told me.

4 Q. And what inner circle are you referring to? You must
5 be specific here.

6 A. I'm referring to Sheela, Savita. Vidya knew already
7 because she had also gone back and explained this scenario.
8 Shanti Bhadra, Su, and the others are possible, but this is
9 that core group that we would --

10 Q. They were briefed after the surveillance, at some point
11 after the surveillance?

12 A. They were told what the scenario was, what we had
13 planned, what it looked like, what the possibilities were.

14 Q. At some point after the surveillance; is that correct?

15 A. Yes.

16 Q. What else did you do in regard to this particular
17 assignment of yours? What did you do? Anything?

18 A. To the assignments of the assassination on Mr. Turner?

19 Q. Yes?

20 A. That's it.

21 Q. And what happened for the rest of that summer? Do you
22 recall a time when you actually left the ranch?

23 A. Finally left the ranch?

24 Q. Yes.

25 A. Because there were other times where I actually also

1 left the ranch to go on other trips and other kinds of
2 trips.

3 Q. In late June, for example. Let me ask you about one
4 of those trips. What trips did you go on? Any trips in
5 regard to the Turner matter? Specifically Turner, nothing
6 else.

7 A. In late June?

8 Q. At any time the rest of that summer, late June or the
9 rest of the summer. Yes or no, to the best of your
10 recollection.

11 A. To the best of my recollection, no.

12 Q. All right. Did there come a time when you left the
13 ranch finally?

14 A. I left the ranch on the 15th of September of 1985.

15 Q. With whom?

16 A. I left the ranch with Ava, Krishna Deva, Anubhavo,
17 Julian, Su, Sanir, and both of Su's children, Shanti
18 Bhadra, and Shanti Bhadra's child, Aruna (ph). Savita,
19 Homa, Yoga Vidya, Swami Rajan, Samadhi.

20 Q. And where did you go?

21 A. There was one other person, Durga and her son Max.

22 Q. Where did you go?

23 A. We flew to Germany to a little city called Haunstetten
24 to a kind of like a resort house in this little city to
25 meet Sheela, Puja -- I believe Rajan left with Sheela and

1 Puja. And in any case, that was the entirety of that
2 group.

3 Q. How long did you stay in Germany?

4 A. We stayed in Germany for a short period of time. We
5 were there when the three -- Puja, Shanti Bhadra and
6 Sheela -- were arrested.

7 Q. And you recall roughly how long that was you stayed in
8 Germany before you left Germany? A matter of weeks,
9 months, years?

10 A. It was a matter of months, short months. It wasn't,
11 like, more than two.

12 Q. Now, during that time that you lived in Germany, did
13 you all live together?

14 A. In Germany, in Haunstetten, yes. Then thereafter we
15 started to travel.

16 Q. And what structure, if any, was there for your living
17 while you were living in Germany together in terms of
18 management.

19 MR. WAX: Objection on relevance grounds.

20 MR. REARDON: Directly related.

21 THE COURT: I am going to overrule the objection.

22 THE WITNESS: Well, the structure was very
23 similar to what happened on the ranch.

24 Q. (By Mr. Reardon) What was it?

25 A. I continued to cook, Phyllis and I continued to cook,

1 Savita continued to take care of the money and the finances
2 and dispensing of that money. Su continued in her
3 overseeing position. They weren't clearly defined anymore,
4 these things, because we were a much smaller group. It was
5 very clear the direction came from Savita, especially
6 because she was doing the money, so anything -- anything
7 that we needed or had to do with always, always discussed
8 with her and always discussed with Su as well.

9 Q. Did you have a job in Germany? Did you get a job?

10 A. Not in Germany, in Greece.

11 Q. How did you live? Where was the money coming from, if
12 you know?

13 A. The money was coming from major sources. There wasn't
14 a lot of people giving money. I know that my friend, Su
15 Eva Maria Mann (ph), provided substantial quantities of
16 money to use at that time and they, in the form of a loan
17 which Savita signed acknowledging it was a loan at that
18 time.

19 Q. How much?

20 A. It was about 400,000 Deutsch marks.

21 Q. You recall approximately how much that would be in
22 American dollars back then? It's a little more now,
23 probably.

24 A. I would say maybe 300,000, 325,000. I'm not a
25 mathematical wizard.

1 Q. What -- was your answer the best recollection?

2 MR. WEATHERHEAD: I object. Just a guess at this
3 point.

4 THE COURT: Sustained.

5 Q. (By Mr. Reardon) Is it a guess or do you know?

6 A. The amount of 400,000 Deutsch marks on that --

7 MR. REARDON: We can refine that, of course, Your
8 Honor.

9 THE COURT: Thank you.

10 Q. (By Mr. Reardon) And how do you now this?

11 A. I know this because we -- "we" being those people,
12 being those people that I have just mentioned that left.
13 Now, this is not right because some people did not leave
14 with us. Shall I name the names again?

15 Q. You always need to when you say "we" or "they."

16 A. Samadhi, myself, Shanti Bhadra, Su, Savita, Anubhavo,
17 Yoga Vidya, Rajan, Sandeha, and the children, and Durga.
18 We knew because they had talked with each other that Su
19 Shila, who was Eva Maria Mann, had made this money
20 available to the group. Also additional money to be put in
21 a fund which would help the campaign of these three women
22 that were in prison.

23 At that time Su Shila, Eva Maria Mann, did
24 not know that we had -- that I had participated in any
25 events at the ranch which were considered to be illegal in

1 the United States. So that is one way that I knew, because
2 we were constantly talking about how are we going to pay
3 that loan to -- back to Su Shila? How are we going to do
4 that?

5 Q. Did there come a time when there was a distinction
6 made between a loan and a gift?

7 A. Yes.

8 MR. WAX: Your Honor, at this point again I
9 object on relevance.

10 THE COURT: Sustained.

11 MR. REARDON: Thank you, Your Honor.

12 Q. (By Mr. Reardon) Did there come a time when you left
13 Germany?

14 A. We left Germany in the winter of 1985.

15 Q. Where did you go?

16 A. We went to Athens.

17 Q. When you say, "we," I'm going to ask you --

18 A. The people in that house in Athens were Sandeha and Su
19 and Su's children, Rajan, myself, Phyllis, Ma Deva Rikta,
20 Samadhi, Ma Savita and Anugiten --

21 Q. And where did you live?

22 A. -- and Durga.

23 Q. Where did you live? Sorry, my fault.

24 A. We rented -- actually rented a house in kind of like a
25 suburb in Athens. We lived together in that house.

- 1 Q. Do you recall approximately when this was, 1985, 1986?
- 2 A. It was the beginning of 1986, all right.
- 3 Q. How did you all live at that point? How did you
- 4 sustain yourself?
- 5 A. From the loan that Eva Maria Mann made available to
- 6 us. From this money we lived. And when we started to run
- 7 out of this money, then the people in this group got
- 8 together to discuss going to work.
- 9 Q. In fact, I'm going to ask you -- incidentally, the
- 10 name "Eva Mann"?
- 11 A. E-v-a, M-a-r-i-a and Mann, M-a-n-n.
- 12 Q. And she have another name, a sannyasin name?
- 13 A. Yes.
- 14 Q. What is that?
- 15 A. Ma Dhyan, D-h-y-a-n, Su Shila, S-u S-h-i-l-a.
- 16 Q. Is that the woman that you lived with?
- 17 A. Yes.
- 18 Q. All right. Now, did you work? Did you go to work in
- 19 Greece?
- 20 A. Yes, I did.
- 21 Q. What type of work did you do?
- 22 A. I did two kinds. I taught English to whoever wanted
- 23 to learn to speak English, which in this case turned out to
- 24 be two -- well, I had two students, an older man and a
- 25 young woman. And that was work that I did where I actually

1 earned money.

2 Q. And what did you do with the money you earned?

3 A. I gave it directly to Savita, all of it.

4 Q. Did others work?

5 A. Rikta and I also worked in a restaurant, a Greek
6 restaurant for a short period of time where we also earned
7 some money.

8 Q. What did Rikta do with the money she earned?

9 MR. WEATHERHEAD: Objection, relevance.

10 THE COURT: Sustained.

11 Q. (By Mr. Reardon) Did there come a time when you
12 learned that an FBI report of Ava had been sent to your
13 group?

14 A. Yes.

15 Q. And where there discussions about this report?

16 A. Yes, there were.

17 Q. And who participated in those discussions about the
18 report?

19 A. Basically all of us participated, with the exception
20 of the children and Sanir, who had no idea.

21 Q. And do you recall having discussions with Savita or Su
22 about this report?

23 A. Yes, I do.

24 Q. Tell the jury what you recall?

25 A. It was never that someone came and said, "We have this

1 document." It was never like that. It was more like, "We
2 have managed to get Ava's testimony," or whatever she said
3 to the FBI. We have that now and we can take a look at it.
4 We as a group, except for the children and Sanir, were very
5 concerned that Mr. Turner was left out of the deal which
6 Sheela and Shanti Bhadra pled to, and the -- that we were
7 concerned was --

8 MR. WEATHERHEAD: Objection, Your Honor.

9 THE COURT: Sustained.

10 Q. (By Mr. Reardon) Why were you concerned?

11 A. I was concerned because it was a pretty horrendous
12 things for me to even acknowledge I had partaken in, I had
13 taken part in it.

14 Q. Did you read this report, this FBI report yourself?
15 Did you read it?

16 A. The report was very carefully guarded by Samadhi. It
17 was -- I didn't have it in my hand. I remember Samadhi did
18 read parts of it. I remember that Savita knew directly
19 about this report and knew directly that Samadhi and Savita
20 and Su were discussing in that room --

21 MR. WAX: Objection.

22 THE COURT: Sustained.

23 Q. (By Mr. Reardon) How do you know she knew about the
24 report?

25 MR. WAX: Objection, Your Honor. Just a minute.

1 MR. REARDON: Yes, Your Honor. I'll ask another
2 question.

3 Q. (By Mr. Reardon) Did Savita know about the report?

4 A. Yes, she knew.

5 Q. How did she know?

6 A. She told me.

7 Q. What did she tell you?

8 A. That we have this paper, it's a paper where Ava spoke
9 about the Turner thing. We have that.

10 Q. And was there any orders to you as a result of having
11 this discussion from Savita about things to do or not to
12 do?

13 A. Directly thereafter, directly thereafter came from
14 Savita, but all of us assented that we were not to talk to
15 each other anymore. Especially about the Turner thing, but
16 also about any other possible activities.

17 Q. And when you say "all of us," once again when you say
18 that the record must be clear, to whom are you referring?

19 A. All of the people in the house with the exception of
20 Samir and the children.

21 Q. And who were they?

22 A. These people were myself, Rikta, Rajan, Su, Savita,
23 Durga.

24 I feel like I'm repeating over and over, so
25 if there is one missing it's just, at this point -- but not

1 only they, but also the people -- the rest of us that had
2 been left in Germany, Homa, Vidya -- Homa, Vidya --

3 Q. Excuse me, if I can have a second.

4 And when you talked about your reaction to
5 this FBI report because of the particular horrible thing
6 you had done, what were you referring to specifically in
7 regard to Mr. Turner?

8 A. We were referring -- I was referring specifically to
9 the conspiracy to assassinate Mr. Turner.

10 Q. Your participation. You said, "I was particularly
11 upset." Why? Why were you particularly upset? Not "we."

12 A. Because at that time and since that time and while I
13 was doing it I knew that we had conspired to assassinate
14 Mr. Turner.

15 Q. And what did you feel about it in 1986?

16 A. It has to do with understanding that I was capable of
17 doing something like that. It has to do with a recognition
18 that I participated and took an active part in conspiring
19 to hurt a human being, to murder a human being.

20 Q. Did you plead guilty in this court to conspiring to
21 murder Mr. Turner?

22 A. I did.

23 Q. Did you go to prison for two years?

24 A. Yes.

25 Q. Prior to that time in 1989, did you have counsel?

1 Were you represented in November of 1989?

2 A. I certainly was.

3 Q. By whom?

4 A. I was represented by Mr. Ron Hoevet. That is my
5 lawyer, my attorney.

6 Q. Is he here in court today?

7 A. Yes.

8 Q. Okay.

9 A. He is.

10 Q. Would you indicate perhaps --

11 A. Mr. Hoevet.

12 Q. Or just so it's clear for the record.

13 MR. WEATHERHEAD: Stipulated, Your Honor.

14 THE WITNESS: Sitting back there.

15 MR. REARDON: I'm sorry, may I ask counsel --

16 MR. WAX: I object on relevance grounds.

17 THE COURT: Sustained.

18 Q. (By Mr. Reardon) And after consultation with
19 counsel, did there come a time when you met with
20 representatives from the United States in Berlin?

21 A. I did in the week of November 7, 1989.

22 Q. And prior to that time did you have occasion to meet
23 with Anugiten and Shanti Bhadra?

24 A. I did.

25 Q. Why?

1 A. I might with them -- again, the very specific advice
2 of my attorney, Mr. Hoebet, I met with them.

3 Q. For what purpose?

4 A. I called them. And I drove to talk with Shanti Bhadra
5 and with Anugiten, who we called Jimmy. And the reason
6 that I met with them was because at that point I was not
7 completely decided to turn myself in to the United States
8 Government. It's not an easy decision by any means. I
9 remember. I wouldn't wish it on anyone, because it's not
10 just acknowledging --

11 MR. WAX: Object. Move to strike, Your Honor.

12 THE COURT: Nothing to strike, but I sustain the
13 objection.

14 Q. (By Mr. Reardon) As a result of this, of the
15 conversation with your counsel, whatever he recommended,
16 the fact is you met with these people. Why did you meet
17 with them?

18 A. I wanted to see Shanti Bhadra and Jimmy. I wanted to
19 see and look at them in the eye. Because I knew the
20 direction I was headed was to turn myself in. I knew that
21 what I would say would implicate their lives. I was
22 completely aware of that, a human being, I was a human
23 being.

24 I wanted to see if there was any possibility
25 that the three of us could at least come in together. If

1 there is any possibility we could look at the situation in
2 our lives and face it realistically and make some sort of
3 decision about it before -- intelligent decision as to how
4 we were going to handle our lives. Ms. Caldwell had turned
5 herself in and --

6 Q. No. Just answer my question. Did you also meet with
7 Phyllis Caldwell and speak to her?

8 A. Phyllis Caldwell --

9 Q. Yes or no.

10 A. Yes.

11 Q. What discussion did you have with her?

12 A. Phyllis told me she had turned herself in to the
13 United States --

14 MR. WEATHERHEAD: Objection. Hearsay.

15 THE COURT: Sustained.

16 Q. (By Mr. Reardon) As a result of the conversation you
17 had with -- pardon me.

18 What was the purpose of you speaking to
19 Ms. Caldwell, Rikta? What was the purpose, not what she
20 said. Did you have a purpose in that call, you, yourself?
21 Yes or no.

22 A. Well, yes.

23 Q. Okay. What was your purpose?

24 A. My purpose --

25 Q. Not what anybody else said at this point.

1 A. -- was to speak with her. She was my friend. And
2 then we discussed the fact that she had --

3 Q. No. Don't say what she told you what she learned,
4 what -- just your purpose, why did you contact her and
5 speak with her?

6 MR. WAX: Was the testimony she contacted
7 Caldwell or the other way around?

8 MR. REARDON: I'm sorry. I wasn't sure.
9 Ms. Scissors' view it was the other way.

10 MS. SCISSORS: It was the other way.

11 Q. (By Mr. Reardon) Did you have a purpose in that
12 conversation? That doesn't rely on who initiated it. Did
13 you have a purpose? You understand the question?

14 A. I understand the question.

15 Q. Just yes or no.

16 A. The situation wasn't just like this. She called me.

17 Q. Go ahead. During that conversation did you have a
18 purpose in speaking to her and accepting that call?

19 A. Yes. My purpose was to hear what she had to tell me
20 about turning herself in to the United States Government.

21 Q. All right.

22 Q. And did there come a time when you came back to the
23 United States?

24 A. Yes.

25 Q. And you pled guilty in this court to conspiring to

1 murder the U.S. Attorney, and the United States made
2 certain promises to you; is that correct?

3 A. That is correct.

4 Q. Under that plea agreement there were certain crimes
5 which you committed, speaking about you, that the United
6 States agreed not to prosecute you for; is that correct?

7 A. That is correct.

8 Q. I want you to tell the ladies and gentlemen each and
9 every one of them either in the plea agreement or not in
10 the plea agreement. Do you understand that?

11 A. I do.

12 Q. All right. Tell them.

13 A. The United States Government agreed not to prosecute
14 me for the burning of the Wasco County commission planning
15 office in The Dalles. It agreed not to prosecute me for
16 the wiretapping.

17 Q. Go on.

18 A. It agreed not to prosecute me for my involvement in
19 the attempted murder of Devaraj, and it agreed not to
20 prosecute me in my involvement in salmonella at nursing
21 homes and schools and at a political rally in The Dalles.

22 Q. Did you spread salmonella at the homes and schools and
23 a political rally?

24 A. I --

25 Q. Yes or no.

1 A. Yes.

2 Q. All the places?

3 A. No.

4 Q. Well, then listen to my question. Did you spread
5 salmonella in nursing homes, at the schools, and a
6 political rally?

7 A. If spread salmonella at the political rally.

8 Q. Do you know what salmonella is?

9 A. It was a substance that Puja had given me and told me
10 it would make people sick.

11 Q. What did she call it?

12 A. Sally.

13 Q. What did you do with it?

14 A. I took it out of the tube I was carrying it in. I
15 put it on my hand and I shook the hand of a man who was
16 sitting next to me, an older man.

17 Q. Did you do anything else with it?

18 A. No.

19 Q. How about the schools, the nursing homes, did you do
20 anything there?

21 A. No.

22 Q. What do you do now?

23 A. I work in Berlin. I work with my friend Eva Maria
24 Mann.

25 Q. What type of work do you do?

1 A. She is personally wealthy and invests her money and I
2 help her. I help her to do office type of things, to do
3 the billing, to do the bookkeeping. I do translation from
4 English to German because I can speak German now. I give
5 her insight to what I think, what I feel. I do those
6 things. I do other things.

7 Q. And how long have you lived in Berlin?

8 A. I lived in Berlin -- with the exception of the two
9 years I spend here in the United States during my
10 imprisonment, I lived in Berlin for nine years.

11 MR. REARDON: Thank you, ma'am.

12 I have no further questions on direct, Your
13 Honor.

14 MR. WEATHERHEAD: I'll defer to Mr. Wax.

15 MR. WAX: It would be a reasonable time to take a
16 break.

17 THE COURT: Recess for 20 minutes.

18 (Recess)

19 THE COURT: Mr. Wax.

20 MR. WAX: Thank you, Your Honor.

21

22

23

24

25

1 evidence.

2 MS. SCISSORS: Your Honor, can we reserve, take a
3 look at the photographs again during the break?

4 THE COURT: Yes. All right. Very good.

5 MR. GLICK: I have no further questions.

6 THE COURT: Any cross?

7 MR. WEATHERHEAD: No cross-examination, Your
8 Honor.

9 MS. SCISSORS: No.

10 THE COURT: You are on your way, Mr. Hoenigman.

11 MR. REARDON: Alma Peralta, please.

12

13 ALMA PERALTA, Government's witness,
14 duly sworn.

15

16 THE CLERK: Please state your name for the record
17 and spell your last name.

18 THE CLERK: Alma Peralta, P-e-r-a-l-t-a, Potter,
19 P-o-t-t-e-r.

20 MR. REARDON: May I proceed?

21 THE COURT: Yes.

22

23

24

25

1

DIRECT EXAMINATION

2

BY MR. REARDON:

3

Q. Good morning, Ms. Peralta.

4

A. Good morning.

5

Q. Ms. Peralta, did you have another name at another time
6 in your life?

7

A. Yes, I did.

8

Q. What was that, please?

9

A. Ma Dyhan Yogini.

10

Q. How do you spell that?

11

A. D-y-h-a-n Y-o-g-i-n-i.

12

Q. I'm going to ask you where are you from, where were
13 you raised?

14

A. I was raised in Yuma, Tucson, Arizona.

15

Q. And of what -- how many people did your family
16 consist?

17

A. Well, we are myself and two brothers. My mom was very
18 ill. When she -- when I was six years old, my mother and
19 father divorced. When I was 12, my mom died.

20

Q. What did you do after that time?

21

A. My fate, from that point on, I went to school. I
22 finished my school -- my school, and I went on to Arizona
23 State University and I finished with a degree.

24

Q. When you were --

25

A. In 1976.

1 Q. When you were six and your parents divorced, what
2 responsibility did you have for your mother?

3 A. I was another part of my mother, kind of like a senior
4 would be, something like that. My mother had a brain
5 stroke and couldn't speak, so I had to take care of
6 everything in the family from the time I was six years old,
7 including my little brothers, including translating for my
8 mom. She couldn't expect English. Basically I was -- I
9 was the one in charge, I was the one responsible in that
10 family.

11 Q. And what about your education? How important was that
12 to you?

13 A. It was incredibly important to me. My mother, one of
14 her great dreams was I would find some sort of education.
15 And mind father also had that. So finding my education was
16 not just for me, it was all for my family.

17 Q. And what education did you have? Can you tell us
18 about that? You need not go all the way back. Did you go
19 to high school?

20 A. I finished high school in Tucson, Arizona. I went to
21 the University of Arizona thereafter, Arizona State Tempe,
22 and I finished with a bachelor of science.

23 Q. Slow down a little, please. Not for you; Mr. Stimler.

24 A. Okay.

25 Q. Did you graduate from any of these schools?

1 A. If graduated from all of them.

2 Q. With what degrees?

3 A. I graduated from Arizona State with a degree in
4 clinical nutrition and dietetics.

5 Q. And what degrees did you pursue or discipline did you
6 pursue in advanced education?

7 A. I started very strongly in the university with study
8 philosophy. Basically, I had thousands of questions I
9 think like we all do as we are growing up. But that was my
10 like my mind allied my heart my heart and soul. At that
11 time I was already married and so we decided then, my
12 husband and I, would be good to have a job where I could
13 also earn some money. So then I left philosophy and
14 attended in the service of diabetics.

15 Q. Did you have a job in that regard?

16 A. Yes.

17 Q. What kind of employment did you hold?

18 A. The first job I had when I was 21 years old, I was
19 managing the kitchens for a geriatric nursing home. And
20 the second job I had I was manager for a school district of
21 3,000 children, so I would write their menus and make, you
22 know, programs for the children. And in fact I worked in
23 food services practically the whole way through school.

24 Q. Now, did there come a time when you were interested in
25 the philosophy involving Bhagwan?

1 A. What happened for me was Bhagwan was -- I had a very
2 dear friend, someone who I completely trusted and loved.
3 One day he came to me with a book. And the book was an
4 explanation of the Rajneesh Schuntu, S-c-h-u-n-t-u, who was
5 a Chinese mystic whose work I very much respect. Bhagwan
6 was interpretation of that. That is how I met him. That
7 it's how it started for me.

8 Q. Do you recall how old you were at the time?

9 A. I was around 27, 28.

10 Q. Where were you living at the time?

11 A. I was living in Tempe, close to Tempe, Arizona.

12 Q. Now, after becoming interested in this philosophy did
13 you pursue it?

14 A. Yes. As soon as I read the interpretations that
15 Bhagwan had offered of Schuntu, I immediately thought to
16 myself I must go there. My friend told me he was alive and
17 he was living in Poona.

18 Q. Forgive me, it may be just me. Could you slow down?

19 A. Okay.

20 Q. Are you nervous?

21 A. Yes.

22 Q. Take a deep breath and slow down so you can tell the
23 ladies and gentlemen. All right?

24 A. I don't know that the breath is going to take all of
25 the nervousness away.

1 Q. I try sometimes and it works and others it doesn't.
2 Try and slow down, please.

3 A. All right.

4 Q. All right. So what did you do, further your interest
5 in this particular philosophy?

6 A. I read think book that I could get my hands on from
7 Bhagwan. And thereafter I -- my husband and I were going
8 through a divorce proceedings. So therefore, all the money
9 that I got from the sale of that house, I used in the
10 purpose of booking a ticket to go to Poona.

11 Q. Did you go to Poona?

12 A. Yes, I did.

13 Q. When did you go to Poona? Do you recall the year?

14 A. It was in 1981. I left Poona, I take sannyasin, which
15 is called wearing the red clothing, put the mala on.

16 Sannyasin means a person on the path of a particular
17 teacher. My particular teacher was Bhagwan. I took it on
18 my birthday April 16, 1954. I left one day after Bhagwan
19 left Poona to come to the United States.

20 Q. And why did you leave?

21 A. India was the only possibility to stay three most.

22 Q. Why was that?

23 A. Because of the -- you know, the procedures in India,
24 one could only stay for three months and then one has to
25 leave. So I managed to extend it for one month, then I

1 knew it was time to go home.

2 Also Bhagwan I understood was coming to the
3 United States. I thought that was very exciting for me.
4 Incredibly exciting he would would come to the country I
5 had grown up in and he would like to go there.

6 Q. And in fact did there come a time when you did return
7 to the United States?

8 A. Yes.

9 Q. Tell the ladies and gentlemen when that was, to the
10 best of your recollection.

11 A. To the best of my recollection, that was in May of
12 1981.

13 Q. And when you came back to the United States, where did
14 you go?

15 A. I went back home.

16 Q. Where is home?

17 A. My mom and dad picked me up in Tucson. That was home.

18 Q. When you say "mom and dad," what does that mean?

19 A. My father and stepmom --

20 Q. Concerning your earlier testimony --

21 A. -- they came and picked me up. I arrived in the usual
22 state of sannyasin with \$12 in my pocket and red clothes
23 and incredible books and stories to tell. My father was
24 completely aghast. He was --

25 Q. And how long did you stay at home?

1 A. Not very long. I wouldn't say more than a couple of
2 days. I went back to Phoenix and started to work.

3 Q. What type of work did you do?

4 A. I managed a restaurant.

5 Q. And how long did you stay there in Phoenix?

6 A. I stayed in Phoenix until I felt that I had enough
7 money, I had my life prepared enough to go to be at the
8 ranch.

9 So then I made my way toward the ranch.
10 That must have been already early in the year of 1982.

11 Q. Now I'm going to ask you how is it that you actually
12 got physically to the ranch the first time?

13 A. I drove with a friend of mine who was also wanting to
14 go to the ranch. We went to San Francisco. From
15 San Francisco we bought a tent because there were not
16 enough houses at the ranch. So I bought a tent. We drove
17 from San Francisco all the way up.

18 Q. And how was it that you could go to the ranch
19 without -- did you have any type of reservation or
20 permission?

21 A. No. No. It was -- we had to ask permission. There
22 was very definite procedure to asking. We were all like,
23 "Gosh, what if they don't let us come? What will we do?"

24 Q. And whom did you ask for permission?

25 A. We asked the people in charge, which at that time were

1 being approached by Yoga Vidya, Ma Su.

2 Q. When you say "Ma Su," you see Ma Su here in the
3 courtroom?

4 A. Yes. There.

5 Q. Please indicate where she is sitting, what she is
6 wearing for the record.

7 A. She is wearing a green necklace, long black hair, red
8 top.

9 MR. REARDON: Shall I continue or do we have a
10 stipulation?

11 MR. WAX: She identified.

12 MR. REARDON: Thank you.

13 Q. (By Mr. Reardon) And how did you ask permission?

14 A. To the best of my recollection, we called. And we
15 didn't -- well, we called.

16 Q. Did you receive permission?

17 A. We received permission to come, yes.

18 Q. Over the phone?

19 A. Over the phone.

20 Q. And did there come a time when you actually arrived at
21 the ranch itself?

22 A. Yes.

23 Q. And do you recall approximately when that was, what
24 time of year it was?

25 A. That was in the very, very early spring already, so --

1 Q. Of what year?

2 A. March 1982.

3 Q. Could you tell the ladies and gentlemen of the jury
4 what it is that you saw when you first went to the ranch?
5 How you saw it physically.

6 A. I saw it an incredible expanse of desert land. And
7 there wasn't a lot of people there at that time. There
8 wasn't a lot of sannyasins. It was -- you know, the people
9 were with Bhagwan. But the people that were there were
10 working very, very hard to begin a settlement, a settlement
11 which would see many, many thousands of other people coming
12 eventually. And it was a very busy time. It was a really
13 exciting time. It was a very beautiful time.

14 Our tent, we set it up in the mountains
15 somewhere. We had to walk like 15, 20 minutes every night
16 after work.

17 Q. When you say "we," so we are precise for the record,
18 with whom are you referring?

19 A. In this case I'm referring to another sannyasin woman
20 who shared the tent with me. We shared it until winter, at
21 which point it got really cold up there and we had to go to
22 the trailer.

23 Q. When you arrived at the ranch, did you have to check
24 in with anyone?

25 A. Yes, we did.

1 Q. With whom did you check in?

2 A. First with Ma Yoga Vidya. She was the one at that
3 time assigning job assignments.

4 Q. Did you receive a job assignment?

5 A. Yes.

6 Q. What was your initial responsibility?

7 Pardon me. What did your original
8 responsibilities on the ranch include?

9 A. I was set to work with Patipada to work in the
10 kitchen. And initially I was to do anything or whatever
11 was needed to do in those kitchens, which included cleanup
12 or cutting up, chopping thousands of vegetables or washing
13 pots and pans. Anything of this nature.

14 Q. And in regard to your philosophical interest, how did
15 you further that with regard to Bhagwan Shree Rajneesh
16 during this time, if at all?

17 A. You have to understand that Bhagwan was the quality of
18 teacher around whom people came not necessarily to receive
19 from him directly a lesson, but simply to be in his
20 presence or in the presence of the place where he lived.

21 And so for me it was a tremendous honor and continued to be
22 an honor to the very end to live there where he was. And
23 it was enough for me to know that he was there. And so
24 when he would come in a drive-by, it was wonderful to see
25 him.

1 Q. What was a drive-by?

2 A. Drive-by happened around noontime at the ranch every
3 day unless he wasn't feeling well or something else
4 happened. It happened every day. He, oh, would come and
5 drive his car. Everyone would line up along the road,
6 those dusty roads, and he would drive by and he would greet
7 us all. A drive-by. It was a moment, oh, to communicate
8 with him silently.

9 Q. What did that mean to you?

10 A. It meant everything to me. It meant everything.

11 Q. And when you arrived at the ranch, you said there
12 weren't many people there. Can you tell the ladies and
13 gentlemen of the jury to your best recollection of
14 approximately how many people were there when you first
15 arrived at the ranch?

16 A. I think there was definitely under 1,000. There might
17 have been 500, 800 people there.

18 Q. Did you learn from your first experience at the ranch
19 whether there was any type of management structure?

20 A. Well, I learned immediately that there was a
21 management structure.

22 Q. How did you learn that?

23 A. Well, it was very obvious to me. First of all, in the
24 community the exchange between the sanniyasins and myself
25 was immediate, so I was immediately told, "Look for a job.

1 You can get assigned from Vidya and Ma Su. Ma Sheela is in
2 charge of this operation here." And working with her, you
3 know, immediately I was sold -- Ma Prem Savita at that
4 time, Ma Yoga Vidya, and other people. Patipada was the
5 one I was to report to. Ma Padma was in charge of the
6 cleaning department. And so on and so.

7 Q. And beneath these persons whom you have described were
8 the rest of the sannyasins?

9 A. There were many people at that time at that level in
10 the hierarchy. I didn't know them all when I came to the
11 ranch. By the time I was entering, already this inner core
12 of people, it had already slightly adjusted and
13 structured -- was structured differently. But all along
14 the leading people in charge were Ma Anand Sheela and Ma
15 Prem Savita, Ma Su, Ma Yoga Vidya, and others who I --
16 because I wasn't in that circle at that time, did not
17 participate, but I came in contact with Patipada, Ma Homa.

18 Q. You didn't mention Bhagwan himself. Why not?

19 A. Bhagwan was in a -- for me, in my way, the way I saw
20 things and for a very, very -- and also because I
21 personally never received direction from him. I received
22 directions from Ma Anand Sheela, and she was the one that
23 connected with him. So any instruction that I would
24 receive when -- later on, the last to what -- the last that
25 I was at the ranch came from a particular hierarchy,

1 particular way of getting this information.

2 Sometimes Sheela would tell directly and
3 sometimes she would tell one of the people that were at her
4 level. And the people at her level were Ma Savita and Ma
5 Yoga Vidya, and directly under that tier was Pragma -- the
6 way I saw it and understood, I think it was pretty clear,
7 was Ma Padma, Su, Patipada, Homa, and then underneath that
8 tier, I was underneath that one.

9 Q. Now, let me ask you. When you first arrived at the
10 ranch, did there come a time when you learned of any
11 concern about immigration matters and immigration law?

12 A. In the summer of 1982, when -- while I was working in
13 the kitchens, I was approached by a young man who asked me
14 to marry him. His name was Iver Potter. And so I agreed
15 to marry him.

16 We entered into intermarriage so he could
17 stay at the ranch. In order for that to happen, I was
18 present and brought into a room with him as I was. Satya
19 was his name at that time, S-a-t-y-a, and he and I were
20 instructed on how exactly to go about this interview, the
21 INS interview we would face.

22 We were asked if it was possible to do the
23 marriage elsewhere, which we did. We did it in my home
24 state, which was Arizona. So he and I went and traveled
25 there alone and arranged our marriage and became married

1 and, yeah. And so that was one away that I knew that we
2 were having to really address INS. And because there was
3 so many sannyasin that wanted to be with Bhagwan, they
4 could only stay three months. It was the same as in today.

5 So what we decided then was -- when I say,
6 "we," was the decision that was made in which I took a
7 part, was to marry each other. We married each other.
8 They could stay longer. They could stay many years.

9 Q. Now, are you an American citizen?

10 A. Yes.

11 Q. Was your, quote, husband an American citizen?

12 A. He was British.

13 Q. Did you have occasion to learn of other couples,
14 "couples," quotes, that were in your same situation?

15 A. Yes.

16 Q. How common was that at the ranch at this time?

17 A. It was very, very common. So many of the people,
18 specially the old sannyasin who wanted to stay with
19 Bhagwan, were very busy trying to find American partners.
20 And there was one other additional situation which was
21 where we were drilled if the INS was to come to the ranch
22 what would we do. Oh, would we open the door, keep the
23 door closed, what kind of things could we say. And also
24 the drilling for what -- we -- I spent hours talking to
25 each other about who we were. Up to that point, we didn't

1 know each other.

2 Q. Let me ask you this. Did you know -- not anybody
3 else. Did you know at the time that you went into this
4 marriage that if it were discovered that it was a fraud,
5 the others were fraud, did you have an understanding of the
6 impact on the commune?

7 A. Yes.

8 Q. And what was that understanding?

9 A. On the impact to the commune?

10 Q. What would it have been?

11 A. We knew that authorities in the INS were suspecting us
12 of doing this, so it was extremely important that when I
13 went with Iver for our INS interview, that we were very,
14 very clearly not to address the fact that we were
15 sannyasin, because if we addressed that, then, all right,
16 some sort of hindrance was already going to be there. So
17 we didn't want to talk about the sannyasins. That's why we
18 went to Arizona.

19 Q. What does that mean? Explain that to the ladies and
20 gentlemen, that's why you went to Arizona.

21 A. Well, we went to Arizona to take away any possible --
22 I grew up in Arizona, so it was only natural when I went to
23 the INS I would say to them, "I want this man to be my
24 husband in my home state." That would take away any shadow
25 of suspicion that we were sannyasins, that we were coming

1 from Oregon.

2 Q. So this INS interview would occur not in Oregon, but
3 in fact in -- no. I'm talking about two different
4 interviews, one with the actual authorities from the INS in
5 Arizona, and then other ones at the ranch where we were
6 prepared. We were absolutely prepared and drilled into
7 what to say when we would go into that interview.

8 Q. And was one -- I'm referring you -- I refer you to the
9 INS, that is, its investigation and interview by
10 Immigration and Naturalization Office. Where was that to
11 take place? Not being prepared at the ranch. The INS
12 interview.

13 A. The INS interview would take place in Arizona. There
14 was just -- and it did take place there.

15 Q. I'm going to direct your attention, now, to the end of
16 1982, and really into 1983 at the ranch, and ask you what
17 were your responsibilities during this particular
18 timeframe.

19 A. The end of 1982 and going into 1983, my
20 responsibilities were to do anything that was required to
21 do in the kitchen, and that meant getting food together,
22 helping to prepare it for anywhere from one to two thousand
23 people, to as many people that would come for the
24 festivals. At that time, I was not in charge of Magdalena,
25 which was the name of the cafeteria. I later became

1 completely responsible for it. Up to that time, they
2 gradually, gradually, gradually I began to take the
3 responsibility for managing or becoming a mom of Magdalena
4 cafeteria.

5 Q. Now, I rushed you into 1983. I got to go back for a
6 second to 1982 again, and I believe my question was -- that
7 I didn't allow you to answer was, Did you yourself have
8 knowledge of what would be the impact upon the commune if
9 the fact that these marriages, ever came out, the reality
10 that they were arranged?

11 A. Yes.

12 Q. And what was that knowledge?

13 A. The impact was that it was a crime. That if this was
14 found out especially on the scale we were doing it, that it
15 would seriously -- well, it would completely jeopardize
16 Bhagwan's stay in the United States because he would be
17 implicated also. And it would implicate us, all the
18 Americans who have to face whatever charges. The Europeans
19 and then others would have to leave. So it was very
20 important, then, to be prepared for that.

21 Q. What would happen to the commune in this case?

22 A. It would have just fallen apart.

23 Q. Did you know that from the beginning?

24 A. Yes.

25 Q. I am going to direct your attention now into the years

1 1983 and 1984, and ask you what, if any, changes did you
2 perceive and do you have knowledge of in the management's
3 structure of the ranch compared to the way it was when you
4 first came? Were there any changes at the top?

5 A. No. The changes at the top were Bhagwan was the
6 teacher. He was our guru. Directly responsible to him,
7 completely directly responsible to him was Sheela.
8 Responsible to her was Ma Prem Savita and Ma Yoga Vidya.
9 And these two people were her representatives when she
10 wasn't at the ranch. And then underneath, like I mentioned
11 before, was another tier of coordinators, and underneath
12 that another, and underneath that another.

13 Q. And for your own assignment, did you have a reporting
14 structure?

15 A. Yes. I had a very definite reporting structure in the
16 beginning which changed at the end. In the beginning,
17 anything that had to do with the kitchens I would report to
18 Ma Prem Patipada. Ma Prem Patipada would report it further
19 on, to Ma Anand Sheela.

20 Q. Now, let me ask you in regard to the ranch's
21 population in 1983, what observations did you have of the
22 growth or not growth of the population?

23 MR. WAX: Excuse me. I'm going to object to the
24 extent of this background and foundation testimony. At
25 this point in the trial, I think it's cumulative.

1 THE COURT: I think that is correct. Let's speed
2 it up.

3 MR. REARDON: Thank you.

4 Q. (By Mr. Reardon) In 1983 into 1984, what was the
5 mope population of the commune?

6 A. It was in the several thousand.

7 Q. And what happened physically to the ranch at this
8 time?

9 A. It exploded into growth. The city took on immense
10 proportions. We began to build many, many structures,
11 which is as far as I am concerned a miracle would happen at
12 the ranch at that time. The commitment that the
13 sannyasins -- we all had was extraordinary. The
14 willingness to work forever no matter what was
15 extraordinary. So it exploded. You know, beautiful hotel,
16 our medical facilities became very large, the building of
17 the homes and places where people could live. It was one
18 didn't have time to breathe or think. One was doing and
19 just being there.

20 Q. You alluded later on to Ma Prem Savita. Do you see
21 her here in the courtroom?

22 A. Ma Prem Savita is sitting --

23 MR. WEATHERHEAD: Stipulated.

24 MR. REARDON: Thank you.

25 Q. (By Mr. Reardon) And in 1983 into 1984, now, what

1 was your relationship, if any, with Su?

2 A. At that time up until the point when I began to the
3 inner core, my relationship with Su, I knew her from sight.
4 I knew who she was. She was very well known on the
5 commune. And I knew that she was one of the upper part of
6 the hierarchy. I knew she worked very closely with Ma Yoga
7 Vidya. And yes, I knew those things about her.

8 Q. And was Savita -- what was your relationship at that
9 time with Ma Prem Savita?

10 A. I knew who she was. I knew that Savita was incredibly
11 responsible. I knew that. All sannyasin knew that. We
12 would talk about it. I also knew she was in charge of
13 financial institution for the entire ranch.

14 Q. And during this time period in 1983, 1984, did you
15 know whether Sheela traveled often?

16 MR. WAX: Your Honor, again the same objection I
17 made a few moments ago.

18 MR. REARDON: This is integral --

19 THE COURT: All right.

20 MR. REARDON: -- motive in this case.

21 THE COURT: I understand.

22 MR. REARDON: I'm into '85 almost.

23 THE COURT: All right.

24 MR. REARDON: Thank you.

25 Q. (By Mr. Reardon) I believe the question was did you

1 have knowledge whether Sheela traveled a great deal in 1983
2 into '84? Now we are into '84, almost '85.

3 A. '84 and '85, I knew without a shadow of a doubt that
4 Sheela traveled a lot.

5 Q. And who was the boss when she wasn't there?

6 A. When she left, Ma Prem Savita would be the one to call
7 in to see Bhagwan.

8 Q. Now, in 1985, did you observe any change in Su's
9 status in the management of the ranch?

10 A. Su was working very closely with Ma Yoga Vidya.
11 Towards the end, I would say probably the spring of 1985,
12 Vidya was having tremendous difficulty with some of the
13 things that were happening there in that inner core,
14 because by the time --

15 MR. WAX: Excuse me. I'm going to object and ask
16 that be stricken.

17 THE COURT: Sustained. Nonresponsive.

18 MR. REARDON: Thank you.

19 Q. (By Mr. Reardon) Just address yourself as the Court
20 has ruled to your knowledge, if any, of the -- of Su within
21 the hierarchy.

22 A. She was in the upper and the very, very upper
23 hierarchy, so directly under Sheela, Savita and Yoga Vidya.
24 She was -- at that point, she was one that I directly
25 reported all activities, all activities that I did.

1 Q. Directing your attention into 1985, now, we are going
2 to go right there, 1985. Did you have occasion to have
3 your own responsibility, official responsibilities on the
4 ranch change?

5 MR. WAX: You would want to know their will be a
6 motion before the luncheon break with respect to the last
7 response.

8 MR. REARDON: Well, I don't know how to answer
9 that, Judge.

10 THE COURT: I don't either. Go ahead.

11 Q. (By Mr. Reardon) I'm sorry?

12 (Last read)

13 A. There was more evolution rather than change. I was
14 still responsible for the kitchen. We were two -- I was
15 still responsible for -- there was more evolution than a
16 change. It was more like that. In addition to the
17 responsibility of taking care of Hassid and Magdalena
18 cafeteria, I began to play a very integral role in the --
19 this inner core of people, this top echelon of coordinators
20 who were called "moms" at the ranch.

21 Q. Now, in 1985, directing your attention to the spring
22 of 1985, what was your knowledge of the immigration concern
23 at the ranch?

24 A. At that point we were viewing Mr. Charles Turner as a
25 serious threat to Bhagwan.

1 MR. WAX: Excuse me. Objection to the "we." I
2 believe the question related to her.

3 MR. REARDON: Fine. Thank you.

4 Q. (By Mr. Reardon) Speak about yourself. I asked you,
5 the question was about your knowledge.

6 A. Okay. At that time I personally was aware of
7 Mr. Charles Turner as a serious threat to Bhagwan's ongoing
8 stay at the ranch and to his freedom, that I along with
9 other people were talking about the possibility that he
10 might be arrested.

11 Q. Who? "He" is Mr. Turner or Bhagwan?

12 A. Bhagwan. So what was beginning to happen already in
13 the spring was gut-wrenching for us, for myself and others.

14 Q. Now, in regard to your specific responsibilities on
15 the ranch, did they in fact carry you outside the ranch and
16 outside the continental United States? Did you go to
17 Australia?

18 A. I traveled, in March of 1985, a personal helper to Ma
19 Anand Sheela to Australia. Ma Prem Savita went as well as.
20 Ma Prem Padma went as well, and some others.

21 Q. And how long did you stay in Australia?

22 A. We returned in May, so it wasn't the whole time in
23 Australia, but a good portion of that. We were going to
24 visit some Europe communities. We were in Australia for a
25 good portion of that time.

1 Q. The name Helen Byron mean anything to you?

2 A. Helen Byron is a name of a sannyasin woman who made a
3 loan to the ranch. She made a loan to the financial part
4 of the ranch for a pretty large sum of money. And what
5 happened with her was she asked to have this loan repaid.

6 And Ma Sheela told us that she had spoken.

7 MR. WAX: Excuse me, I'm going to object.

8 THE COURT: Sustained.

9 Q. (By Mr. Reardon) Did there come a time when you
10 learned in fact Ms. Byron filed a lawsuit in this case --
11 pardon me, in regard to this money she loaned to the
12 commune?

13 A. Repeat that, please.

14 Q. Did there come a time when you learned there was a
15 lawsuit filed by Ms. Byron against the commune for that
16 money?

17 A. Yes.

18 Q. Did there come a time when you learned there was a
19 trial set in this courthouse on that suit?

20 A. Yes.

21 Q. Did there come a time when you learned the result of
22 that trial?

23 A. Yes.

24 Q. When did you learn the result of the trial?

25 A. We learned the result of that trial directly after the

1 trial was over.

2 MR. WAX: Again. Object to the "we."

3 THE WITNESS: I learned the result of that trial.

4 Q. (By Mr. Reardon) Yes.

5 A. In the Portland Hotel because Ma Anand Sheela told us
6 what had happened in that trial.

7 Q. What did you learn?

8 A. I learned that we had lost, I learned that the
9 ranch -- the financial part of the ranch had lost a
10 tremendous amount of money because we lost the lawsuit. We
11 talked collective -- at that time it was collective
12 sannyasins, we were doing this together. So we lost the
13 money. And which led to fury, just led to fury.

14 Q. Now, what were you doing in Portland at the time of
15 the Helen Byron verdict? Did you have responsibility here?
16 Yes or no.

17 A. Yes.

18 Q. Did there come a time when you left Portland to return
19 to the ranch? Yes or no.

20 A. Yes.

21 Q. Why did you return to the ranch?

22 A. I returned to the ranch because the work that I was
23 doing in Portland was finished, at least for that time
24 being. And when it was finished it was time to go back to
25 the ranch.

1 The additional reason was that there was --
2 it was a time to report back then to the ranch what had
3 happened.

4 Q. Now, directing your attention to the Byron verdict and
5 leaving Portland after the Byron verdict. Do you
6 understand that? At the Byron verdict. Where were you
7 when you learned of the Byron verdict, physically?

8 A. I was in Portland.

9 Q. All right. Did there come a time when you returned to
10 the ranch after learning about the Byron verdict?

11 A. Yes.

12 Q. Why did you return to the ranch?

13 MR. WAX: Objection. Asked and answered.

14 MR. REARDON: I think she was very unclear about
15 any timing. I was doing that for the precision of the
16 record.

17 THE COURT: I think it was clear. Sustain the
18 objection.

19 MR. REARDON: Okay, sir. Thank you.

20 Q. (By Mr. Reardon) When you went back to the ranch --
21 and incidentally, did others accompany you back to the
22 ranch, if you know?

23 A. I believe at that time -- I don't remember clearly.
24 Ma Prem Samadhi was with me. But in any case --

25 Q. Directing your attention to your time back on the

1 ranch immediately after the Byron verdict. You understand
2 that time period?

3 A. Yes.

4 Q. Did there come a time when you had occasion to attend
5 a meeting at the ranch?

6 A. Yes.

7 Q. And where did this meeting take place?

8 A. This meeting, like all meetings, took place in
9 Sheela's bedroom.

10 Q. And why expressly, if you recall, was this meeting
11 held?

12 A. Sheela was incredibly angry because she had asked us
13 to make an attempt on Helen Byron's life and we hadn't done
14 it.

15 MR. WAX: Objection to that, Your Honor.

16 THE COURT: Overruled on that. Go ahead.

17 Q. (By Mr. Reardon) At this meeting, who attended?

18 A. At this meeting I was there, Sheela was there, Savita
19 was there, Patipadma, Padma was there, Ava was there,
20 Shanti Bhadra, Puja was there, and Su was there. There may
21 have been others. Those are to the best of my
22 recollection.

23 Q. Now, during this meeting, restricting your answer to
24 the Byron verdict itself and Mr. Turner, what, if anything,
25 occurred?

1 A. In that first meeting -- there were many meetings,
2 there wasn't just one, there was a continual meeting in
3 that particular time at the ranch. In that particular
4 phase we were called in. It was very specifically that
5 these people were called and no others. Sometimes in
6 Sheela's bedroom it was just many, many people in there.
7 But at that particular time it was just for the purpose of
8 screaming at us where Sheela said to us very clearly and
9 for which I felt really strange because we had been asked
10 to do something to Helen Byron. That was myself, Ava
11 and --

12 MR. WEATHERHEAD: Objection. Move to strike
13 and --

14 Q. (By Mr. Reardon) Restrict yourself, as I told you,
15 just to the Byron verdict itself.

16 A. Okay. Because of the failure --

17 THE COURT: Ladies and gentlemen, ignore that
18 last remark. It is stricken. Out of your consideration.

19 Now, take your time with these questions.
20 Listen carefully to them and just respond to the questions.

21 Q. (By Mr. Reardon) Okay. Ms. Peralta, if you have a
22 problem, please ask me about the question. I'll read it
23 back to you or have it read to you.

24 A. I understand. It's just that in my head everything is
25 very mixed.

1 THE COURT: You just need to be careful. We have
2 certain procedures we have to follow.

3 THE WITNESS: Okay. Because of the fail --
4 because we had lost the lawsuit, Sheela was incredibly
5 angry. There were other things happening, but that simply
6 ignited it. It was like throwing fire -- fuel on the fire.
7 And as she called us in --

8 Q. (By Mr. Reardon) How were you called in?

9 A. Pardon me?

10 Q. Do you recall specifically how you were called into
11 the meetings, the methodology, how you were notified?

12 A. To this meeting, I don't remember. Normally it was by
13 beeper.

14 Q. What does that mean? We may know, but for the record.

15 A. Well, we had beepers. We carried beepers. I the went
16 on, we were to immediately call certain people.

17 Q. All right. And at this meeting, give us, continuing
18 as I already told you to confine it the agenda of that
19 meeting.

20 A. What Sheela said to us was, "I'm sick and tired of
21 things going wrong and things not getting done. I'm sick
22 and tired of your incompetency." And then she said, "Are
23 you cowards or are you sannyasins of the Bhagwan Shree
24 Rajneesh?"

25 So why I remember this so clearly is because

1 I felt very burdened by that. Because many things had not
2 gone as Sheela wanted them to go. So therefore, I thought
3 she was going to scream at me personally. And I thought
4 that I would be asked to either step away from the inner
5 circle of people, which I very much wanted to be a part of,
6 or that I was going to completely be stepped on.

7 So she was incredibly well known for --
8 sometimes for her vicious handling of people. Not all of
9 the time. She was very well known for that. And I was
10 very scared. So when she was saying these things, I was
11 taking it to mean that I had personally failed in these
12 things that she had asked not only myself but others to do.

13 So we hadn't accomplished many of them. We
14 hadn't -- they weren't complete. And then she did say
15 those things. She did say, "I'm sick and tired of you guys
16 being incompetent fools and not doing what I asked you to
17 do." I took it to mean those particular things.

18 Q. Now, what, if anything, was said about Mr. Turner
19 specifically at this first meeting, to your knowledge?

20 A. To my knowledge, Mr. Turner's name was mentioned in a
21 meeting following that one.

22 Q. Okay. Then the answer is no?

23 A. The answer is no.

24 THE COURT: All right. Let's take our break at
25 this time for noon. We are going to recess until 1:15,