EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN THE MATTER OF

The National Spiritual Assembly of)
The Baha'is of the United States of)
America under the Hereditary)
Guardianship, Inc.)
)
)
Counter-Defendant)
)CIVIL ACTION NO:
V.)CV-N-64C-1878
)
)
The National Spiritual Assembly of)
The Baha'is of the United States of)
America, Inc.)
)
Counter-Claimant)

DEPOSITION OF JOEL B. MARANGELLA

CONFIDENTIAL: ATTORNEYS' EYES ONLY

MAY 1, 2007

AT: 9.40 am

Taken at:

Joondalup Resort
The Boardroom
263 Joondalup
Connolly, WA, 6027

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were covered.

Q. I see.

A. Yes.

Q. Okay. Where were you born?

A. In Massachusetts outside of Boston 1918. 22 September 1918.

MR GOLDBERG: Answer the questions only, may I ask and let him - - -

A. Yes.

BY MR DOLAN:

Q. Are you a US citizen?

A. Yes.

Q. Where did you attend high school?

A. Well, I attended high school - first of all in, Eliot, Maine, outside of Green Acre Baha'i School for a few months and I started high school in New York City and then I attended a school - a high school in Miami, Florida for a year and then two years in Lake View High School in Chicago where I graduated.

Q. Did you attend college?

A. Yes.

Q. And where was that?

A. University of California. Well, before that I took some courses at George Washington University in

Washington DC and one course at the University of Maryland and then afterwards the University of California in Los Angeles.

Q. What did you do after college?

A. Well, I was going to school. This is after the war. I had been released from active duty. I was working in Los Angeles California and I was in the University of California for a year when the - then the War Department, now the Department of the Army, sent a letter asking me to come back on active duty and I accepted that because I wanted very much to go to Europe, with what was then, I recall, a seven year plan of Shoghi Effendi was inaugurated. And so I was recalled on active duty in August then of 1946 - yes, '46. And I was assigned to Chicago. It was the Army headquarters in the Wacker building in Chicago for a few months before later on going to the Pentagon.

Q. And you stated that was with the Army branch of the Armed Forces?

A. That was with the Army. It was Army, yes. I was a lieutenant and then was promoted to Captain actually while I was in Chicago.

Q. So at the time you entered the service you were living in California?

A. New York City. I was drafted in 1941, May of

1941. And I actually was the delegate from the New York City to the Baha'i Convention at that time and I asked the draft board to give me permission to go as a delegate to the Convention, which they granted, and then I was drafted as a private and then I went up the ranks as an enlisted man and I went to officer candidate school and became an officer.

Q. Where were you when you were re-enlisted?

A. You mean when I was called back?

Q. Correct.

A. You mean from Los Angeles. I was living in Los Angeles and that was 1945 or 6. I think it was August of '46 when they called me back for duty.

Q. Were you stationed anywhere besides Chicago at that point?

A. Well, I was in Chicago only a few months when I was assigned to the Pentagon. And they - I wanted to go overseas to Europe because Shoghi Effendi was asking for pioneers to go to Europe and that's why - that's one reason why I went back in the Army and I was stuck in Washington for three years and then before the opportunity came to me to be assigned to France. Paris, France in 1950. And that's the start of my career in Europe and I was there ever since. Well, until I came here.

Q. How long did you live in Paris, France?
A. That was quite a history, by the way.
Q. It is. How long did you live in Paris, France?
A. Well, we were actually in Paris, France itself. Four years the first time and then I moved to Orleans, France, which is about 35 miles south of Paris. We used to still live in Paris and I used to commute daily and initially - the initial period of service was four years as an officer. I asked for an extension and I got another three years and then, of course, Shoghi Effendi said it was imperative that I remain in France. I requested to get out of the service and took a civilian job with the headquarters, the major headquarters in France. And I was able to get out of the Army and then I remained in France as a civilian employee in the headquarters until we moved to - well, General de Gaulle kicked us out in '67. I was a year with the US Embassy in Paris clearing up the problems they had with - you know, because we had established about 27 depots wanting communications across France, a pipeline to support the German -- support for the troops in Germany and then when de Gaulle kicked us out I spent a year in the US Embassy in Paris getting rid of offices there and then was

assigned to Europe for five years, headquarters there. And that's where I retired in Europe; my wife's German.

Q. Why were you sent to Orleans from Paris?

A. Well, because headquarters moved. We first were in the Astoria Hotel, and it's about a stone's throw from the Arc de Triomphe, and then (inaudible) headquarters came and took over building and we were moved to a - we were expanding into larger headquarters so we moved to Orleans, France and established the headquarters there in a (inaudible)

Q. Did you live at the headquarters itself?

A. No, no. Initially, as I said, I lived in Paris, for the first four years that we were down there, and then later, the second - my second tour there which I was supposed to get, I lived there for the remaining time at Orleans itself, this is not too far from the (inaudible) like a house of course - well, a house I rented with my family.

Q. So it was not on a base or anything of that nature?

A. Well, the headquarters there was - the major headquarters and it supervised this logistical establishment we had throughout France. We had 27 depots, had a pipeline. It was - because at that time

they were very concerned about a supply line being from Bremerhaven in Germany which is very close to the Russian border, and they were afraid, in case of a war, that Bremerhaven would be overrun almost immediately. So that's why they wanted a supply line across France, and they got permission to establish all these depots that were to support the forces in Germany. And so that's how I happened to be in France, and we were there, I would say, for - from 1950 till 1968, or '67 - no, '67, April, clearing out - getting things out of France, closing the depots and selling stuff to the French and were trying - we lost - we lost millions of dollars in the process.

Q. Was your apartment on a base itself, or was it in a - - -

A. No. I was in a house. I rented a house in Orleans.

Q. Did there come a time when you were transferred then to Germany?

A. Yes, there was, 1968. After spending about a year in Paris attached to the US Embassy, clearing out the remains of our facilities then after that, I was assigned to Worms, Germany - W-o-r-m-s - not too far from Heidelberg, Mannheim, and I spent that remaining five years before my retirement there, at that

headquarters there. Well actually, the same headquarters had transferred there, headquarters, communications room.

Q. What was your status at that point? Were you an enlisted officer?

A. I retired as a major in 1957; took a civilian job at the same headquarters and I retired as a GS-13; I remember I was – when we were transferred back to Worms and - 1973 when I retired, and I retired as a - I think I kept - after I retired as a major active service, I became - active in the Reserve. I used to be an instructor in the Reserve program and got promoted to a Lieutenant Colonel although I wasn't a full Colonel. But I was retired at full Colonel in '68 - September 22, 1968.

Q. So, to be clear, you were in France in connection with your work with the Army during the period from 19 - - -

A. Right. Yes, the same time I - - -

Q. From 1960 to 1967?

A. 1950. 1950.

Q. But it was at least through 1967. Is that correct?

A. Yes.

Q. Okay.

Faith and I knew all the old Baha'is.

Q. Were you the first to receive a copy of this proclamation?

A. No, the secretary of the NSA received it, and he came down to Orleans and then read it to me, you see. The secretary of - Bernard Fillon, was the first to see it, and then he read it to us, and as soon as he read it, I immediately accepted it, but that didn't have any bearing until we had a meeting of the National Assembly, when we read it in front of everyone. And then we had time to reflect on it, and read from the Writings, go back and pray on it and then we reassembled, we voted, and we accepted it.

Q. For the benefit of the court reporter, could you spell Mr Fillon's last name?

A. F-i-l-l-o-n.

Q. Thank you. Do you recall that Mason Remey appointed you to be president of the Second International Baha'i Council under his second Guardianship?

A. Yes, I recall that.

Q. And when was that appointment?

A. Well, what happened was, we were visiting him in Florence that was Forenze where he lived and he said to me he wanted to activate - well, first of all, he -

that was in '64 - he indicated he wanted me to - the actual appointment date was - what's the appointment date, Jeffrey?

MR GOLDBERG: You can't ask me questions.

A. But, anyway, in - no - yes, that's right. I was visiting him in Florence, Italy in Firenze where he lived outside Florence, and he told me to activate the International Baha'i Council, which he appointed me. And I went back to Orleans - and actually it was in October '65 we had a publication called Glad Tidings, in which I announced the activation of the International Council. Actually, this actual appointment, indication of appointment, I think - I think it was '64, I believe - I believe - because, you see, prior to that time, he had sent me a letter, on 5 December 1961, in which he said you'll know when to open this envelope and so, yes, that's right. In 1964, I received an appointment as president of the Second International Baha'i Council, and I realised the implication of that appointment, so then I opened the letter that he had sent. We were living in Switzerland at the time and I had it deposited in the safe deposit box, so I opened the letter and it said, "This is to tell you to tell the Baha'i world that you are my successor, the third Guardian of the Faith." But I

didn't announce that to anyone because - I don't know why not, I just didn't announce it to anyone. Then when he appointed me president of the Second International Council, I thought, well, the implication is clear because his succession to Guardianship was based on the fact that he was the president of the First International Baha'i Council, and so I thought, well, everyone will realise that I'm president of the Second International Council, then automatically I will become Guardian of the Faith when he dies. That was my thought at the time. So then, later on, he told me to activate the council; that was in October '65, and the publication called Glad Tidings, that we put out at the time - that I announced that the council assumes the task. And realising - I didn't - I knew I didn't want to really activate the - Mason really actually wanted me to activate the council as a functioning body because that would mean that he would be no longer the guardian; he was abdicating. So I tried to word my statement in that article. The fact that I was just assigning an individual task to individual members of the council, only, thinking that that would probably preclude my actually activating the council as a functioning body. And later on, it was only in 1969, 12 November '69, that I realised that actually the

council had been activated, and that I had not achieved my purpose in trying to preclude that happening. And that actually I had become the Guardian when that publication was put out in October '65.

BY MR DOLAN:

Q. So the implication, then, you mentioned earlier, of his appointment, that implication was that you were to be his successor and the third guardian?

A. Well, there was every indication in those days that I was to be his successor, yes, and of course, later on, he revoked that and appointed Donald Harvey - 1969.

Q. When you say that he revoked that - - -

A. Well, in effect, he revoked it by appointing, in May '69 - appointing Donald Harvey as the successor, which of course, came as a great shock to me.

Q. But you didn't believe that was effective, correct?

A. Well, it served to awaken me that something was wrong, because under the terms of the Will and Testament of Abdu'l-Baha, which is the whole foundation for our administrative order. The Guardian makes his appointment of a successor under divine guidance. And it's a one-time appointment. You don't revoke it later on. So I realised something was definitely wrong when

he appointed Donald Harvey because it was as though he had forgotten completely, in fact - what we had. Forgotten completely his earlier letter to me in 1961, and the fact that I had been - activated the council. So then that awakened me to the fact that something was wrong, maybe. In fact, he had begun to make some statements that were unlike him, contrary to his previous statements about the Guardianship and so on, and it led me to believe that perhaps his mind had begun to fail. And so all these things awakened me and then I reconsidered what had happened when I activate - when he told me to activate the council, and I realised that I had been the Guardian from that very time, October '65. I hadn't realised it until 12 November '69, when I issued my proclamation.

Q. So you were the Guardian beginning in 1965?

A. Yes, but I didn't realise it. I served Mason Remey faithfully as - I'm trying to help him. I didn't consider myself the Guardian at all until the 12th - 12 November '69.

Q. When you stated that Mason Remey had named Donald Harvey - - -

A. Yes.

Q. Was that after the injunction in this action?

A. It was May '69, so it was after the

injunction, because '66 was the injunction.

Q. Mr Marangella, I'm going to hand you an exhibit that has been previously marked in this proceeding as exhibit 89. There's a copy for counsel.

BY MR GOLDBERG: Thank you.

BY MR DOLAN:

Q. Do you recognise this copy?

BY MR GOLDBERG: I'm sorry, what number was this?

BY MR DOLAN: It's number 89.

BY MR GOLDBERG: Thank you.

BY MR DOLAN:

Q. Do you recognise the five names at the bottom of the page?

A. Oh, yes, the more - I know them all very well.

Q. And who are those five people?

A. Donald Harvey, Mr Derakhchan, a Persian Bernard Fillon, the secretary, Jacques Soghomonian who now claims to be the guardian.

Q. And yourself?

A. And myself.

Q. Were these the members of the French NSA .....

A. Yes, yes, they were all members then.

BY MR GOLDBERG: Let him ask it.

BY MR DOLAN:

Q. That's okay. These are the members of the

French NSA, that decided to follow Mason Remey?

A. Well, there was some others that withdrew. Initially there were eight that accepted; this showed me five. But the other eight, well - for example, the one lady who lives in - who lived in Nice - and she was surrounded by a lot of people who were hostile to the Guardian and she finally gave in.

Q. But these four people were joined to you in accepting Mr Remey's appointment?

A. Yes, yes. Yes, definitely.

Q. Did any of them later work with you on the Second International Baha'i Council under Mason Remey's second guardianship?

A. Well, you know to say "work" is a misnomer, because actually members of the Second Council lived in various parts of the world; you know, very - it was impossible to get together, and we only - Mason Remey dissolved the Council a year afterwards. During that year, there was practically no activity - no activity on that body. As a matter of fact, I can't remember - it was impossible to be convened as a functioning body. And I - off-hand, can't recall at this stage an individual task that I was going to give them. I can't recall assigning individual tasks at this time to any of them - during that one-year period.

Q. Weren't there individuals assigned to different regions of the world, with yourself as the president overseeing those activities?

BY MR GOLDBERG: Objection. Leading. Go ahead.

A. They were already living in other parts of the world. They were not assigned; they were living in different parts of the world, you see. France, South America, Mauritius Islands, France. I mean, it was - they weren't assigned there; they were already living there.

Q. Do you recall a gentleman by the name of John Byers being liaison or otherwise given the job of working with the US NSA under Mason Remey?

A. I knew John Byers very well. I don't recall him doing any special function. I don't recall that. It may be but I don't recall it.

Q. I'm handing you now an exhibit that's been marked 138. Do you recognise this document? Is that your handwriting?

A. It is.

Q. This letter is dated August 18, 1960. Correct?

A. Right. I don't recall this letter at all.

Q. Okay. If you can take a look at this spot that I've marked there with the highlighter - do you

see the highlighter?

A. Yes. Yes.

Q. This is a letter - correct me if I'm wrong, this is a letter to Frank Schlatter, correct?

A. Yes.

Q. And it expresses your joy to learn that he had accepted the second Guardian.

A. Right.

Q. This is a response to Frank's announcement to you that he had accepted the second Guardian. Why did he write you about that?

A. I don't know why he would write. I don't know why would. I don't know.

Q. How did he know how to reach you?

A. I guess by - I guess most people knew. They must have know my address because I - you know, I was very active in the faith. I don't know Frank would - that he knew - 18 August 60. I'm not sure how he - how he knew my address really.

Q. So he must have known that you had accepted Mason Remey as Guardian, correct?

A. Well, see, it was May of 60, by that time he probably - probably yes - and I must have, yes, he must have - - -

Q. How would he have learned of that?

A. I can't recall, whether we - I'm not sure how he learned it. I can't remember that. It's a long time ago.

Q. Had you been in a communication prior to the date of this letter?

A. I don't recall - I don't recall any communication with Frank because that was - that was not too long after - all this - it's only three months after the Proclamation was received. So, I don't think I ever communicated with him.

Q. You don't think you ever communicated with him prior to this letter to you?

A. Let's see. I just can't - no, no. Because I - the first time I met Frank Schlatter, I know it was after - I had made a trip to the States to visit one of my sons and I stopped off at - in - Albuquerque, just some place near Albuquerque, New Mexico and I met Frank for the first time then. So it had to be subsequent to this, I'm sure.

Q. See, this date - this letter is dated 1960 so you were, of course, so you were corresponding with him at that point at least.

A. That was all of 60, yes. That's when my .....

Q. Because - - -

A. That was my first letter to him 18 August

1960.

Q. You think that this is your first letter?

A. I'm sure it is. When - the phraseology seems to imply that.

A. I'm saying:

Please forgive my delay in replying to your very kind letter, July 24th.

I'm sure that was the first letter I received from him.

Q. I've got another exhibit for you, please, it's exhibit 139. This is dated October 16, 1960.

A. Right.

Q. Is that your writing - - -

A. That's my writing.

Q. Do you recognise this letter?

A. No, I don't even know who it's addressed to. No idea at all.

Q. I wonder is this - - -

A. Fifty years - almost 50 years ago.

Q. I see there's no addressee. Is this a letter that was something of a form you would have sent to communicate to others facing .....

A. If that be a personal letter - - -

BY MR GOLDBERG:

Objection, the witness has already testified he has

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no knowledge of the letter.

BY MR DOLAN:

Q. Well, it's his letter. I'm trying to jog his memory.

A. Well, that's 50 years ago.

Q. Do you know if you sent letters like this communicating this information to Adie Petzoldt.

A. I don't recall it being - it may have, I don't recall anything in it. It may have but I don't remember it.

Q. Another exhibit for you - it's exhibit 140. If you look at the second page, it appears to bear your signature. Is that correct?

A. That's correct. If you can give me time to read this whole thing. Do I need to read it?

Q. I'm just going to direct your attention to something on the first page?

A. All this?

Q. Yes. See there you mentioned to Mr Schlatter that Donald Harvey had been in touch with Dr Jensen of Joplin, Missouri. Is that Leland Jensen?

A. Yes.

Q. It states that you had met he and his wife .....

A. He stayed with us at our apartment in Paris.

Q. And my question was, did you contact Mr Jensen about joining the group that was recognising Mason Remey.

A. He and his wife, Opal visited our apartment when we were living in Paris. At that time he was going on a pioneer some place and he was named a Knight of Baha'u'llah by Shoghi Effendi at that time. But I don't recall - I can't recall the exact date when he was there. It must have been some time between 1950/54 but I don't remember the date and I don't recall - I mean that would have been prior to Mason Remey's Proclamation, long before.

Q. And after the Proclamation you don't recall?

A. I never talked to him. Yeah.

Q. Another exhibit. This one from 1961. It's exhibit 141. Look at the last page. This is also a letter signed by you - correct?

A. That's correct.

Q. If I could direct your attention to the second page please?

A. Yes.

Q. You see in the second paragraph I've marked a passage with the highlighter.

A. Yes.

Q. It says that:

You might add that I have found a very wonderful letter put out by the Quincy Assembly particularly useful over here.

Now this is referring to the Quincy, Illinois Assembly that had accepted Mason Remey, is that correct?

A. That's right.

Q. And what did you find useful about their letter if you recall?

A. I don't remember.

Q. It says here, just following that passage, that:

It especially impressed the friends in Holland and has helped them over the question of the branch.

What does that refer to?

A. What, the branch?

Q. Yes.

A. Well, you see, quite a few of the Baha'is were hung up over a passage in the Will and Testament of Abdu'l-Baha. By the way, I'm not sure whether you know anything about the Will and testament of Abdu'l-Baha because the Findings of Fact, a document that your client in the States put out, does not even mention the Will and Testament of Abdu'l-Baha which is the very foundation of our Administrative Order. a divinely

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conceived document put against it. It doesn't even mention that that organisation is based on the Will and Testament of Abdu'l-Baha because they can't do that as they have corrupted it so badly. Now, so - and the Will and Testament of Abdu'l-Baha, says in case Shoghi Effendi does not have a lineal descent, it says he may appoint another branch to succeed him as a Guardian of the Cause and many of the Baha'is interpreted that term "branch" - by the way in the Will and Testament, it's a small "b" not a capital B - to mean the Aghsan or actually relatives of Baha'u'llah - Sons of Baha'u'llah, Sons of Baha'u'llah. So that's what I'm talking about. I'm talking about they misunderstood - that to mean only someone who is one of the Aghsan or Sons of Baha'u'llah could inherit the guardianship and that patently is erroneous because none of them are living for one thing. After Shoghi Effendi died - and actually the Will and Testament of Abdu'l-Baha, puts - puts - I mean - - -

MR. GOLDBERG: Can you stop one second?

A. Yes.

MR. GOLDBERG: Did the tape turn off?

A. Are you all right. Well it's a very critical question - it's a question of the branch, because the Aghsan were not left. There were no longer - no longer

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Branches, the Sons of Baha'u'llah. In fact, Shoghi Effendi specifically pointed out the Branch ..... with a capital B, Aghsan are the Sons of Baha'u'llah and Shoghi Effendi who translated from the original Persian, Farsi, the Will and Testament, specifically put lower case b, not capital B. So it meant someone who is spiritually qualified and not necessarily a relative or Son of Baha'u'llah and they, in fact, were not even living when Shoghi Effendi was still a Guardian so he couldn't appoint one as a successor. So I'm talking about that, that question.

Q. So to help them - - -

A. Understand.

Q. Just so I understand, to help them over the question of the branch, you need to do that in order for them to understand the hereditary guardianship principle and why Mason Remey could be second Guardian?

A. Yes. To understand that branch meant that it was no limited to a Son of Baha'u'llah or a relative of Baha'u'llah.

Q. Do you recall that you visited Israel with an attorney some time in the early '60s?

A. Yes, 1961.

Q. What was the purpose of that visit?

A. Mason Remey asked me to go there to present to

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the Israeli Government facts concerning his succession to Guardianship with the hope that officially the government, would recognise him as such, and so I met with the Ministry of - Minister of Religious Affairs and the head of ..... Dr Harmer, and the head of the Baha'i Department, Dr Colby, and presented documentation. I was accompanied by Fergus Belanger who was a lawyer working at the same place where I worked at and who recently became a Baha'i. He'd written a white paper about the Guardianship and he accompanied me and we had two meetings with them and they were very cordial, very hospitable. Then in subsequent correspondence with Dr Colby he said that "We don't recognise this as a matter that should be settled in court, something that's a religious dispute between Baha'is and it should be settled within the Baha'i Faith and that's something that's not subject to legal action."

Q. So was that visit in connection with opening legal proceedings in Israel against the Universal House of Justice or the Hands and - - -

A. Yes. Well, the Universal House of Justice had not come into being then.

Q. So it would be the Hands?

A. It would be the Hands.

Q. Is that what that visit had to do with?
A. No, no. It was not - it was for them to recognise his succession to guardianship, that was purely the plan.
Q. Was it your idea to pay that visit?
A. No, it was his, completely his idea.
Q. Whose idea?
A. Mason Remey he gave me a certificate attesting to the fact that he appointed me to do that.
Q. Did you discuss any legal actions with Mason Remey?
A. I do not recall ever discussing legal action.
Q. I hand you what's been marked as exhibit 142. And if you could look at the last page, is that - is that your signature on this letter dated May 28 1961?
A. It is.
Q. If you could stay on the last page please? Do you know in the - right before the very last paragraph that begins with "Irene", you're discussing some information - - -
A. Where was that please?
Q. You see just above your signature?
A. Yes. "Irene and the family".
Q. Yes. Then just three lines above that, it states:

This information is important for the future legal case to be opened in Israel.

Does that jog your memory about consulting with Frank Schlatter and Remey and - - -

A. Looking at one - - -

Q. Legal cases.

A. Well, as this is dated May of 61 and I went to Israel in December of 61, you see, so therefore I knew that Mason Remey wanted me to present this case to the - he thought that they could - would consider it on a legal basis and, of course, later on they told me they would not accept - it was not something that should be properly settled by the court. A religious matter - determined.

Q. I'll hand you this marked at exhibit 143. Is this a letter of yours as well?

A. Right.

Q. It is dated July 30 1961.

A. Right.

Q. You see, I've marked a passage there on your copy.

A. Yes.

Q. It says that:

I think the time is drawing nearer when we shall pin the case against the violators in Israel.

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A. Well, where was that?

Q. It's towards the end of the last paragraph. Might be easier if you looked at my copy. You see that large highlighted area there.

A. I see it but - down the bottom here, "time is drawing nearer". Oh, I see, yes.

Q. Does "violators" - who does the "violators" refer to in that letter?

A. Well the violators, they would be - at that time, would have been in the Hands of the Cause abandoning the Guardianship.

Q. This letter also notes that:

The Guardian -

that's Mason Remey, correct -

has good legal advice from a Quincy Baha'i lawyer.

A. I don't know what that's - that's also - I don't know - I don't know.

Q. Do you know how you knew that Mason Remey had good legal advice from a lawyer?

A. He may have written to me, but I don't recall, he wrote to me often.

Q. Do you recall at all that as early as 1961, Mason Remey was planning to institute legal proceedings against the NSA?

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A. I - no, I don't recall that. I don't recall that.

Q. I'm handing you an exhibit marked 144? If you could take a look at the last page please. Is this one of your letters as well?

A. Right.

Q. Okay. And this is to Frank. I imagine that's Frank Schlatter?

A. Right.

Q. Here you're discussing catastrophe theories with Mr Schlatter and - and you state that you've already shared this - Mr Schlatter's letter on catastrophe with John Carr?

A. Carre.

Q. Carre. How did you know John Carre?

A. Oh we met him first when we were living in Los Angeles, California after the war, 1945, and he was retired from the Navy and he was with the Baha'i - I became well aware, I became a member of the Assembly there, the local Assembly - Los Angeles and he was a member of the Los Angeles community and he used to visit us quite frequently. Got to be good friends.

Q. So you were friends with him prior to 1960?

A. Well, that was - yes, yes. That would have been 1940s - about 1946.

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Q. Was John Carre involved with the French NSA?

A. Well, he wasn't a member. He was living in France at the time with his family and so we used to see him in Orleans, France.

Q. So he was an active Baha'i under the auspices of the French NSA?

A. He was an active Baha'i and he later on, went to Florence, Italy.

Q. Did he help you to inform people of Mason Remey's claim to the second Guardianship?

A. I don't recall his assistance at all in that respect.

Q. Here you're sharing - - -

A. He may have done it verbally, you know, that's all - nothing other than that.

Q. Are you aware that John Carre has made statements such as the following:

Mason Remey, along with 25 other Hands of the Cause signed a document stating that Shoghi Effendi had not appointed a successor, yet when Joel Marangella presented Remey with his re-interpretation of the meaning of the Will and Testament, Mason Remey changed his mind and declared himself to be Guardian.

A. I don't understand the inference there at all.

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Q. This is a statement by John Carre that - - -

MR GOLDBERG: Objection, there's no foundation on this.

BY MR DOLAN:

Q. That indicates that you present Mason Remey with your re-interpretation of the meaning of the Will and Testament and that that resulted in his proclamation as Guardian. Why would he say that?

A. I don't know. I had no influence on Mason Remey and his Proclamation. I was completely in the dark and it came as a surprise to me when we received it. I never discussed it with Mason Remey or alluded to that possibility or anything. I don't understand it.

Q. What do you think - how do you think he would explain his basis for making that statement?

A. I've no idea. I've no idea.

Q. I've got an exhibit for you. It's exhibit 146.

A. Yes.

Q. What is this document?

A. Well, I mentioned to you before, I received this envelope within a closed envelope from Remey and when I received it, I was living in Switzerland at the time. I put it in a safe deposit box and left it there

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till 1964 when I opened it. He told me - he told me, you will know when to open - to break the seal.

Q. This is document wherein Mason Remey confirmed your appointment as his successor - - -

A. When I opened - when I opened that envelope in 64, I did that when I was appointed President of the Second International Council because I realised the implication of that appointment so then I thought, well, then I'll open this document and I opened it. That's when he informed me - told me to tell - not himself - me to tell - tell you to tell the Baha'i world that I appoint you the third Guardian of the Baha'i Faith.

Q. This is dated - - -

A. That's one - this right - letter was, I think, 5 December 1961.

Q. Mason Remey had proclaimed himself Guardian, April 1960, I think, you testified earlier.

A. During Ridvan, yes.

Q. And this appointment of you as the successor is dated December 5, 1961?

A. Right. Right.

Q. So in that short time - that short span of time he'd already decided to appoint you as his heir.

A. Right.

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before he announced it?

A. No, no. No inkling whatsoever. May I say a word about Mason Remey?

Q. Sure.

A. He was perhaps the outstanding Hand of the Cause because of his multiple services to the Faith. He was architect for the Baha'i Temples, the Baha'i Temple built in Sydney; the Baha'i Temple that's to be built in Tehran in the future; the Baha'i Temple to be built on Mt Carmel approved by Shoghi Effendi and - one other Baha'i Temple, I think it's on one of the islands. And he wrote initially one of the first Baha'i books put out on the Faith, a publication, and he was an outstanding architect and certainly travelled around the world several times for the Faith, major countries of the world. So he was unquestionably the outstanding Hand of the Cause at the time of his appointment, I'm sure of that.

Q. What appointment are you referring to?

A. As second Guardian. Of course, he was some 25 years older than Shoghi Effendi, 22 years older than him.

Q. Just so I'm clear, my understanding was that Shoghi Effendi appointed him to the - on International Baha'i Council, is that correct?

A. Well, president. The International Baha'i Council is the embryo of the Universal House of Justice and Abdu'l-Baha - Son of Baha'u'llah - somewhere says, the embryo possesses from the first, you know. This is perfect from the beginning. You don't add - don't add the head later on and you don't take it away. It's there from the beginning, it's the perfect, initially possessed, perfect organism.

Q. I'll hand you another exhibit. It's 147. This, I believe, is a letter that you produced from somewhere here, maybe from your home. I just want to confirm is that your writing at the top of the page?

A. Yes, yes, it is. And its his signature at the bottom, yes, of his letter.

Q. When you say "his", you're referring to Mason Remey?

A. Mason Remey, yes.

Q. And is that his personal insignia on the left hand corner there?

A. Yes.

Q. I have another exhibit for you. It's 148. Again, my understanding is this was produced from your own records, is that correct? Do you recognise it?

A. Is this 56? I don't know the letter, but it's obviously my letter.

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Q. Is that your handwriting on the side where it says - - -

A. Frank?

Q. Frank.

A. Yes.

Q. Does that refer to Frank Schlatter?

A. Yes.

Q. What I'm handing you now, is that exhibit 149? Do you recognise this document?

A. I don't remember it, no. 1965.

Q. If you take a moment to look through it, it appears that this is a draft statement that was to appear in the Glad Tidings that year.

A. Yes, right. Right.

Q. So - - -

A. I do remember ..... I remember writing - I knew I'd written a letter to him asking for his approval before I published it. And this, as you now see, was his approval. I don't remember the wording of it.

Q. So the second two pages are your draft letter; the top page is a letter from Mason Remey to yourself. Correct?

A. Right. Including one - one minor change.

Q. I'm handing you now, it's been marked as

exhibit 150.

A. I see.

Q. Do you recognise this letter?

A. Yes. I'd forgotten. No, I'd forgotten. I know Mr.Petzoldt. I talked about him earlier.

Q. Who is the addressee?

A. Mr Petzoldt, chairman of the legal committee, National Spiritual Assembly of the Baha'i, United States of America.

Q. That was the NSA under Mason Remey?

A. It obviously must have been.

Q. If you refer to - - -

A. We asked - we asked for a rapproachment to be accomplished.

Q. You asked - pardon me?

A. We asked for a rapproachment to be accomplished.

Q. Do you see in the second paragraph you had received copies of interrogatories.

A. What's that? Where's that?

Q. You see the second paragraph?

A. The one:

Little wonder that they find it impossible to reply to these interrogatories for to do so would place them in the position of renouncing the Covenant and the

Will and Testament of Abdu'l-Baha.

Yes.

Q. Does that have to do with this litigation?

A. It must have been.

Q. Did your wife also accept Mason Remey's claim to be the Guardian?

A. Yes, she did.

Q. And that was approximately the same time as you?

A. June 1, 1960.

Q. Were your children old enough to do so?

A. Well, you see you can't tell a Baha'i - I don't know whether they still have the same law there. To declare your intention to become a Baha'i is at 15. When I became a Baha'i, you couldn't declare yourself Baha'i until you were the legal age of 21. Now in the States it has now changed to 18, so I met Irene at the Baha'i convention and I don't know exactly when she first declared herself aBaha'i and I never asked her. She was a Baha'i, otherwise she wouldn't have been at the convention.

Q. Were your children old enough to - - -

A. You can't be called Baha'i, as I said, when you're a child. You can't - you have - you're supposed to investigate truth for yourself, then speak the truth

from the principles. So you're given a chance to investigate everything before you become a Baha'i and you can't become a Baha'i until you're the legal age, 18.

Q. So they were under 18?

A. Yes. Two of them have since become Baha'i, I have to say.

Q. When did that occur?

A. I don't remember the date, quite frankly. I can't remember the date.

Q. Did your wife also work on behalf of the hereditary guardianship under Mason Remey?

A. The only thing I can recall doing is when I received many letters from Mason Remey in his handwriting which is - as you know, he asked us to forward these letters concerning - especially after the IBC was canceled, he asked all his letters be returned and she sat down and typed from this, handed the letters, typed copies, which is really laborious because he had a very difficult handwriting to read. That's the only thing I can remember her doing directly.

Q. I'm handing you an exhibit that's been marked 151. This appears to be a letter that you dictated to your wife and if you - if you can read that first line

into the record, please?

A. *Revered Guardian. Joel just received this morning, letters from Mr Petzoldt and Mr Schlatter concerning the latest developments in the legal case.*

Q. Does this refresh your memory at all about your involvement with the legal committee.

A. No, it does not. It does not.

Q. If you look further along in the letter at the first indented paragraph, it states - looks as though you're proposing a change of name for the group to National Baha'i Council. Do you see that?

A. *Joel's suggestions are as follows: National Baha'i Council under the hereditary guardianship would reflect the relationship between these councils at the national level and the International Baha'i Council.*

Yes, okay.

Q. Is that where you call your subgroups now councils?

A. Yes, we do.

Q. I'm handing you now what's been marked as exhibit 152? Do you recognise this letter?

A. Yes. I don't - I recognise the signature.

Q. Did you recognise the signature?

A. I recognise the signature. I'm not sure I recognise the letter. Yes, haven't had a chance to

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Q. You recently established a third International Baha'i Council?

A. Right.

Q. Correct?

A. Right.

Q. What are the responsibilities of the members of that Council?

A. Well, let me explain this, I established that for two reasons: One, was that because of my age of 88 and the Baha'is were concerned about a successor but - if I die suddenly. I used the council as the instrumentality by which I could - as the president, to indicate that I would be - that council - sat on the council that I appointed a vice president, a person whom would be my successor. And I did mention it in my letter at the time. Then, secondly, I felt the need in that the international affairs of the Faith were beginning to expand and there would be desire to have an International Council to correspond with the other bodies, to receive declaration of Baha'is from them, other than having the National Council in the States handle those declarations from foreign countries. So I took the - two things in mind and - so that's the reason why I established the Council.

Q. So the second - - -

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A. Yes, I also point out that I retained presidency of the Council because I didn't appoint someone else. But, as I said, the vice president will succeed in Guardianship.

Q. So the second arm of your explanation, is it accurate to say that the purpose of the third International Baha'i Council is to coordinate the affairs among the NSAs and yourself?

A. Well, again - again. The members of the Council - and it's impossible to have a meeting of that the body - to have consultation with a body and so there would be more or less individual - as I said, individual - the individual task - the Secretary General, I think my Secretary General is Frank Schlatter and I appointed assistant secretaries who could communicate with foreign countries and they helped me address them in their languages. That was the very limited functions initially, just like the - even first International Baha'i Council appointed by Shoghi Effendi initially was confined to activities within the Holy Land.

Q. Haven't you convened the third International Baha'i Council though since they ..... - - -

A. It's not possible to convene it.

Q. - - - like now and the like.

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A. It's impossible to convene. Impossible to convene. I have given instructions to Frank Schlatter to receive declarations from the Baha'is throughout the other countries - declarations. But we have not been able to convene as a functioning body.

Q. Assuming it does convene as a functioning body in the future, what will it do?

A. It'll do - it will coordinate the international affairs of the Faith as the supreme administrative body in the Faith.

Q. That would include working with the PNBC of the United States?

A. Well, yes. Well, by that time it was no more the provisional, it will become the national. Keeping in mind that the provisional is an appointed body. Normally a National Assembly is an elected body by delegates to a convention.

Q. And those appointees, they're all appointed by you?

A. Yes.

Q. I'm handing what's been marked as exhibit 153. Are those your notes along the left-hand column of this letter?

A. It appears to be my writing, yes.

Q. Do you see on the second page - - -

A. Yes.

Q. - - - those are your notes where you write "Cannot accept"

A. Yes. Yes.

Q. I'm handing you now what's been marked as exhibit 154. Do you see this is a letter from Mason Remey to you?

A. Right.

Q. It states that it is leaving matters for you to decide?

A. Well, Mason Remey, I remember him writing - and saying that he was receiving so much correspondence that he could not handle it. After all, he was very old, in his 90s, and he put everything in long hand, he had no secretary, so he said - that's why he asked me to help him so much - and that's what's - that's what's involved.

Q. You were just referring to business before the NSA in the United States under Mason Remey and, pardon me if I'm wrong, he says that he's leaving those matters for you to decide. Isn't that right?

A. *In other words, things are going so well that apart from my special messages that appear in Glad Tidings. It is better for me to leave matters for you to decide. 6 April 66.*

When that's - that's when the Council was still unactivated.

Q. So as president of the Council you were - he was leaving the affairs of the NSA in the US for you to decide.

A. Which he revoked a few months later when he told me the Council no longer existed.

Q. Was that after the injunction that he revoked the Council?

A. Well, it was, I think, October 65 - I think it was October 66, as I recall, he told me to - that the Council no longer existed, one year after its activation. So the judgment was December 66.

Q. Was it in 66?

A. Well, final - wasn't the final judgment December 66?

MR GOLDBERG: I can't answer.

MR MARANGELLA: According to my records.

BY MR DOLAN:

Q. I'm handing you now what's been marked as exhibit 155. Could you again please review this letter and confirm that it's yours and that those are your notes.

A. Yes, yes.

Q. You see where you state that you're

communicating that Petzoldt - at the top of the page please.

A. A letter Mason Remey received from Petzoldt, that he had received - Mason Remey.

Q. It states that you have written to Petzoldt.

A. Yes. That's right.

Q. Did that have to do with you?

A. (inaudible) we were talking about.

Q. Or you think that relates to the old letter?

A. ..... yes, probably.

Q. Thank you. I'm handing you now an exhibit that is marked as 157.

MR GOLDBERG: Did you skip one?

MR DOLAN: I skipped 156.

MR GOLDBERG: OK.

BY MR DOLAN:

Q. Do you recognise this document?

A. No, I don't remember it at all. This is May 1, 1966.

Q. Do you have an understanding of what it is?

A. Let me see. The assembled delegates and believers at the third National Convention of Baha'is under the Hereditary Guardianship wish to send their loving greetings to you as president of the Second International Baha'i Council. That was about three

months before it was dissolved - or four or five months, I guess.

Q. This is a two-part document. Right, there's greetings; there's a section above that said "Greeting to Mason Remey" and then just below that there's a greeting to Joel Marangella.

A. To me, yes, yes.

Q. So this was at a convention of the Remey NSA and during that convention they issued these greetings to both you and Mason Remey.

A. Apparently.

Q. Are you aware of anyone else that they issued such a letter to?

A. No, I'm not.

Q. Why would they include you at this greeting to Mason Remey?

A. Well, because I guess they - because I was the president of the International Baha'i Council, they thought I'd be pleased to receive the information.

Q. And they understood that your appointment as president of Second International Baha'i Council meant that you were - - -

A. Did they address me as such, President, International Baha'i Council.

Q. Would they have understood that that - - -

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language of the injunction?

A. I don't - I don't remember anything about an injunction. I don't know anything at all of an injunction.

Q. You don't the language of injunction in this case?

A. I can't remember this at all. It doesn't - doesn't strike a bell with me at all. Nothing. Of course, it's a long time ago.

Q. Sure. I'll hand you what's marked as exhibit 159.

MR. GOLDBERG: Thank you.

BY MR DOLAN:

Q. If you could look at the last page of this document, it indicates that a copy was provided to Joel Marangella. See that?

A. The last paragraph?

Q. It's the last line of the document.

A. You say it's - I don't see where it shows the - I don't see that.

Q. See at the very left hand side, at the very bottom, it says copy to all NSA's and then it says - - -

A. I see, yes.

Q. Joel Marangella?

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A. Yes.

Q. Can you take a look at this letter, do you recognise this letter?

A. No, not at all, not at all, no. It's dated September 13 1966, no I don't.

Q. Okay. And you know it's been marked as exhibit 160. This appears to be a September 19 1966 letter from Mason Remey to you? Is that your note at the top of the page?

A. Yes, yes it is. It’s my handwriting.

Q. Do you see in the second paragraph where Mason is indicating that the Second International Baha'i Council should be henceforth called the Second International Council of the Abha faith?

A. Yes.

Q. Do you have a specific recollection of that happening?

A. I remember him saying that they changed the name of the Faith to the Abha faith but I don't recall this - that he asked that that Council name be changed, I don't remember that at all. This was only one month before he dissolved the Council.

Q. I'm handing you now - it's been marked as exhibit 161, it's a Glad Tidings publication that you referred to earlier.

A. No, I think 31 was - oh, you said 65? Or 66?

Q. I'm sorry, Mr Marangella, this is a Glad Tidings - - -

A. ..... publication - - -

MR GOLDBERG: This is exhibit 161, is that correct?

MR DOLAN: That's correct.

MR GOLDBERG: Thank you.

BY MR DOLAN:

Q. On the second page, there's a world survey of the Baha'i faith that appears to be penned by you, do you recall that?

A. No, I don't recall it at all.

Q. I'm handing you now, what’s been marked as exhibit 162. Do you recognise this letter?

A. No. Not at all.

Q. Do you see the - - -

A. Copy made - sent to me, yes. I don't remember it at all.

Q. This appears to be a letter from Mason Remey to Mr Petzoldt.

A. Yes.

Q. Do you see where it states that Mr Remey would like the NSA to dissolve, that's the NSA of the US under Mason Remey, correct? It's the second paragraph?

A. That the Second International Council take over the work. I don't remember that at all.

Q. What are you referring to?

A. That paragraph is saying the Council should take over from the NSA, I don't remember that at all.

Q. He's saying the Second International Baha'i Council under the Guardianship should take over for the NSA. You don't recall that?

A. No, it doesn't - doesn't make any sense to me. Because I think it's been pointed out perhaps previously that about that time his mind began to fail.

Q. When do you think his mind began to fail?

A. It began - began to fail some time probably in the Fall of 1965. Because he began to make statements - that were completely contrary to his earlier writings.

Q. And those statements have to do with dissolving the administrative bodies or changing the name of the group?

A. No, that wasn't - those are not the statements I recall, What I recall is when he was stating Shoghi Effendi organised the faith incorrectly. That was the opposite of what he originally said.

Q. Did he make those statements in connection with his instruction to change the name of the group to

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Abha Faith?

A. I think at that time, I think yes.

Q. And you didn't agree with that?

A. Not at all.

Q. I've just handed to you exhibit 163. This again is a Glad Tidings of October 1966, and my understanding is this was produced from your own files. We received it while I was in New Mexico in connection with the Schlatter deposition? If you could turn to the second page, please. Are those your notes on that article titled NSA Accepts Injunction Terms?

A. Does the Suit against NSA no longer any validity. Those are my notes, yes.

Q. And if I could ask you please to turn to the next page as well. Do you see the photograph of some individuals at the left top corner?

A. Yes.

Q. In the back row, if you look - can you read the bottom line with the names listed?

A. The Greater Las Vegas Baha'i Community, you mean?

Q. Yes, that's it.

A. Gathered for Feast.

Q. Do you notice that there is, in the back row, an individual named Kit DeHainot. Am I pronouncing

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that correctly?

A. Yes, DeHainot, I think, DeHainot.

Q. Is that Chris DeHainot, is that the same person?

A. I don't remember, no, I think - I think there was Kit and LaVonne, as I remember, two young people. Kit and LaVonne DeHainot. I remember that.

Q. You don't remember if Kit was Chris' nickname?

A. No, I don't.

Q. Is that the same Kit DeHainant that you appointed to a national council in 1970?

A. Yes.

Q. So Kit DeHainot was a follower under the Mason Remey group, under the auspices of the NSA of the US, correct?

A. Well, she wouldn't have been appointed if she hadn't.

Q. Pardon me?

A. She wouldn't have been appointed if she hadn't.

Q. I know, but wouldn't have been appointed to what?

A. To - she was a member of the Bureau. The National Bureau.

Q. What's the connection, if any, between the

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Q. Were there the DeHainot's among the first to recognise your - you're third Guardianship?

A. I think so, I think so.

Q. Were they the first?

A. At first.

Q. Who was?

A. At first. Well, I know that John and Madeleine Byers did, that I do know but I don't know who the others were. Well, Frank Schlatter, probably. In fact, he I think recognised me after I paid him a visit, to Las Vegas one time.

Q. Okay, I'm going to hand you exhibit 164. Do you see that you're copied on this letter.

A. Pardon me?

Q. You see that you're copied down on the right hand corner of this letter.

A. There are no markings on this.

Q. It's at the very bottom just above the OBF number.

A. Yes.

Q. You see it says CC Joel Marangella.

A. Yes. Mr Byers, Mr Frank Schlatter.

Q. And this is a letter from Petzoldt, the chairman of the Legal Committee?

A. Yes, yes.

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A. Yes.
Q. Could you explain that symbol?
A. That's - now, that by the way, that's not the Greatest Name, that's a symbol of the Greatest Name.
Q. Is it the ringstone?
A. O Thou Glory of Glories! It's spoken of God, the Glory of God.
Q. Are there other names for that particular symbol?
A. No, no. Shoghi Effendi gave the definition of that in his writings.
Q. And what is the definition?
A. I think he had it as the glory of God.
Q. Have you ever seen it used on a ring?
A. Yes, I've got one myself.
Q. And that's to indicate - the symbol is used to indicate membership, is that correct?
A. Yes.
Q. And who is the gentleman pictured below that symbol?
A. That's Abdu'l Baha, son of Baha'u'llah, Founder of the Baha'i Faith, Centre of His Covenant.
Q. Why is he pictured on the web page titled The Guardian of the Baha'i Faith?
A. Well, because it was in honour of his Will and

Testament, which is a sacred and immutable document and he's the Centre of the Covenant, as I've got there, and we are defending the covenant, so it's most appropriate to show Abdu'l Baha as the centre of the Covenant.

Q. But he wasn't the Guardian himself, right?

A. No, he was - well, he was the first Centre - he was Baha'u'llah's successor and the Centre of his Covenant of believers.

Q. And then Shoghi Effendi was the first Guardian?

A. First Guardian.

Q. I noted that in reviewing these pages, that it doesn't say Orthodox Baha'i Faith. Why is that?

A. We use the term orthodox to distinguish ourselves temporarily from the other body of believers.

Q. What body are you referring to?

A. I'm talking about - it was - the believers who didn't accept Mason Remey as the Guardian, didn't accept the continuation of Guardianship. They abandoned the Guardianship. They repudiated the Will and Testament of Abdu'l-Baha.

Q. And you would define those people to include my client?

A. Yes. Most definitely.

Q. And so why is it this - that Orthodox Baha'i doesn't include you?

A. Well, actually, the head of administrative order is an integral part of the Divine Revelation of Baha'u'llah. Abdu'l-Baha was appointed the Centre of His Covenant, and he made a covenant of believers in His Will and Testament that appointed the Guardian as the Centre of the Cause, a head of the Faith interpreter of the teachings and provided for a continuous line of guardians, each to be appointed by the predecessor in office, and that document is considered a sacred document, and in fact, Shoghi Effendi, the first Guardian of the faith, referred to it as a part of the explicit Holy Text, and the explicit Holy Text is not to be changed or altered or rescinded, revoked during the entire dispensation of Baha'u'llah. And that Will provides for a continuous line of guardians and the Hands of the Cause to be appointed by the guardians and caused the Guardian to be the head of the Universal House of Justice - permanent head of the Universal House of Justice, so to - we consider that the true Baha'i faith involves complete adherence to the Will and Testament of Abdu'l-Baha. Shoghi Effendi made that a condition to Baha'is accepting - to be accepted as Baha'i's and declare

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A. I think that's the symbol that he inscribed on the temple built in Sydney that he is the architect of.

Q. The same symbol that appears on his letters that we looked at earlier.

A. I believe so.

Q. I know that this web site appears to contain links to many articles. Here on the fourth page appears to be all articles. I also noted that several are by Shoghi Effendi. Do you know where your - Joel Jay obtained the source material for those articles?

A. What page is that on? What is that?

Q. Its throughout if you look at page 4 of 22.

A. When you say page 4 not counting the cover page?

Q. Sure. If you look at the top right-hand corner it will say page 4.

A. Yes, yes. Right, right.

Q. There you go. You see these articles that are listed, and several are by Shoghi Effendi.

A. Yes.

Q. Do you know where you obtained the source material for those articles?

A. Well, I have the books.

Q. What books are those?

A. Dispensation of Baha'u'llah, God Passes By,

which is a long history of the faith by Shoghi Effendi.

Q. Do you know who published those books?

A. I presume that the Baha'i Publishing Trust in the States, I think.

Q. That's the trust that's associated with my client.

A. Yes.

Q. Do you know who owns the copyright registrations for works of Shoghi Effendi any more?

A. No, I don't.

Q. Did you ever check?

A. No, no, I don't recall checking that out.

Q. Do you know if anyone looked into that on your behalf?

A. Not that I know of.

A If I could direct your attention to page 5 of 22, please. What is this crest at the bottom of the page?

Q. That's something designed by Mason Remey. It's his - I think it has to do with his family crest.

A. Why does that appear?

Q. He comes from a distinguished family. Mason Remy put that on there, I didn't. I mean, that's - because - - -

Q. I'm sorry, I mean why that is appearing on the

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web site.

A. Because it comes before - it came just before the proclamation of Mason Remy and his writings.

Q. I see. If you could turn to page 8 of 22, please. You've posted many articles to this web site, have you not?

A. Right.

Q. How do you choose the names for these articles?

A. I think about something that I will have to write expressing my views and then it comes to me.

Q. Do you try to compose titles that will attract Baha'is that recognise the Universal House of Justice in Haifa or the NSA in Wilmette?

A. No, it’s more than that. I compose titles so that they express my strong views on a subject.

Q. Did you ever instruct others in your group to post articles on other web sites or suggest that they do so?

A. I don't remember. I may have suggested it. I probably have suggested it but I just don't recall specifically when I did that.

Q. Do you recall suggesting that they put reference to your articles in chat groups?

A. Yes, that I do remember saying, yes.

Q. It's the third paragraph.
A. On the front page. Yes.
Q. That doesn't refresh your memory?
A. Doesn't ring a bell at all.
Q. Now if you could turn to the second page, please. You speak there in the first full paragraph of frictions that have built up between the followers in the Rocky Mountains. When did those frictions you refer to there emerge?
A. I do not recall what those frictions were.
Q. Just below that at the end of that paragraph you refer to a battle against the forces of darkness. Do you know who you're referring to there as the forces of darkness?
A. It would be those that abandoned the Guardianship, those that believe there's no more guardian. I said they were the forces of darkness.
Q. Would that include my client?
A. Yes, it would. Most definitely.
Q. I'm handing you now what's been marked as exhibit 170. Do you recognise this letter?
A. I don't recognise it, no. I don't remember it.
Q. Is it a letter from you?
A. It is, oh let me see. Yes, yes.

Q. That's addressed to James Meyer. Is that correct?

A. It's addressed, "Dear sister." It must have been Marilyn Meyer.

Q. I see. Do you see in the second paragraph you state in your letter, "I write with great interest an enclosure entitled a message of vital importance to all the believers in the US concerning the injunction?"

A. Yes.

Q. Do you remember reading that letter or anything about it at this time?

A. No, I don't. But I agree with it, what I read now.

Q. If you could continue in reading from that point where you just left off where it states, "The important thing which this brings out is that the injunction was taken out against," and you name the entity there.

A. Yes.

Q. Do you see where you go on to say that it has no applicability to the faithful friends who are no longer under that administrative body?

A. Yes.

Q. Do you recall if you had an opinion of counsel on that?

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A. No, I had no opinion of counsel.

Q. That was just your opinion.

A. If you consider this - you see, there's two aspects; there's a spiritual inheritance, and then there's the legal inheritance. You people seem ..... legal inheritance, and of course hereditary guidance would mean that someone had inherited the guidance legally, from a legal perspective. From a legal perspective purely, Donald Harvey inherited the guardianship from Mason Remey, you see, so hereditary guardianship has no applicability to us. I mean, from a legal standpoint. Also, do you see this distinction? You see, there's two inheritances; one is a spiritual inheritance based on the Will and Testament of Abdu'l-Baha, and the other is a legal inheritance where you say the last person named, for example, in will and testament is the legal inheritor, so the last person named by Mason Remey as his successor was Donald Harvey, so from a hereditary standpoint legally Donald Harvey, you see, was the guy recognised by them, and a lot of those people continue to recognise Donald Harvey.

Q. But you state that you're the third Guardian.

A. But they have not accepted my Guardianship. They stuck with Mason Remey until he died in 1974, then

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they accepted Donald Harvey. To this day they accept that Donald Harvey's successor Jacques Soghomonian who he appointed.

Q. You sate that you're the Guardian of the Baha'i faith - correct? - and you're Mason Remey's successor.

A. Because I'm basing my Guardianship on the Will and Testament of Abdu'l-Baha, which is spiritual inheritance, but those people who accept Donald Harvey and Jacques Soghomonian after him are basing it on a legal standpoint. Do you see the difference?

Q. Is that intended to explain your statement in the second paragraph? You're drawing a distinction between legal and spiritual in that paragraph.

A. Do I mention it there? I didn't realise I'd mentioned it then at that time. Where is that?

Q. No, you don't appear to.

A. Where is it?

Q. It's the second paragraph.

A. "Thank you" ..... yes, yes. I say it's not presumed to infringe on our right to religious liberty, organising religion according to one's dictates. At this time I had not thought of the distinction, the legal versus the spiritual inheritance.

Q. When did you think of that distinction?

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A. Well, I thought of it recently when this whole thing came up.

Q. What whole thing?

A. This legal business we're involved in now.

Q. This contempt proceeding?

A. Yes. In thinking about it I thought to myself, "They're not making a distinction between the spiritual inheritance and this legal inheritance."

Q. Could you take a look at the second page of that document, please? This appears to be a letter from James Meyer to you.

A. Right.

Q. Do you recall this letter? You can take your time and review it.

A. I never recall receiving a letter from James Meyer. Never.

Q. Do you see where here he explains that he has a literature list of his supplies on hand, offering service to you and a large mimeograph and addressograph machine and a Post Office box.

A. He was in the United States and I was in Europe.

Q. Yes.

A. So he wouldn't have been able to do much for me.

Q. Wasn't the Provisional National Baha'i Council in the United States - - -

A. But I mean he says a mimeograph, addressograph machine, "We offer these things ourself for whatever use you may wish to employ them." I don't recall asking him to do something like that.

Q. I'm handing you now what's been marked as exhibit 171. You can take a moment to review this. Do you recognise this as a transcription of one of your letters?

A. I don't see a signature on here.

Q. I don't believe there is one. My understanding is this was prepared by Frank Schlatter from one of your writings.

A. It's obviously my writing. I mean, I can - - -

Q. You recognise - - -

A. I recognise the type of phraseology.

Q. You will see at the third page I've indicated a section there with highlighting mark for you.

A. Yes.

Q. You say there, "Who then would have been in the strongest position to join legal battle with the violators into endless victories which lie inevitably in wait for the Knights of the Covenant? Alas this

battle must now wait for another day." What were you referring to there, if you recall.

A. Well, apparently I'm saying we must wait until we have a sufficient number of believers to effectively prosecute the spiritual battle against the violators of the Covenant.

Q. This says, "Join legal battle," doesn't it?

A. Well, at that time I thought maybe in the future there would be a legal battle.

Q. This was after the injunction - - -

A. It would be some time in the future. It would be some time in the future when we have a sufficient number of believers. The only legal battle we would be involved in would be probably to acquire certain properties maybe, something like this. I don't know.

Q. Like in the first case.

A. Possibly so, yes.

Q. Isn't that what that case was about ..... properties.

A. I understand it was. I understand it was, although I don't remember the details.

Q. I'm handing you now what's been marked as exhibit 172. Do you recognise this as your letter?

A. It's my signature, yes.

Q. This is addressed to Carol and Frank

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Schlatter.

A. Right.

Q. You will see in the portion that I've drawn your attention to with the highlighting marks that you've requested Mr Schlatter transfer his secretarial records of the Remey NSA to your national bureau.

A. "If you're able to pass them on to the first administrative body that exercises national jurisdiction." Okay.

Q. Do you know if Mr Schlatter did transfer those records to the Bureau?

A. I do not recall this letter at all.

Q. Do you recall the event of him transferring secretarial records?

A. No, I do not. The Bureau of course at that time would have been in New Mexico, and of course I wasn't in that area at all, I was in Europe.

Q. But you're corresponding with Frank Schlatter in this letter about the transfer of records.

A. Yes, but I don't remember - maybe they reported to me, maybe they didn't. I don't remember.

Q. Back up a little bit, please. Could you explain the role of the Guardian - well, of yourself in your group? Is the third Guardian the ultimate authority?

A. Yes, according to the Will and Testament of Abdu'l-Baha.

Q. Is the third Guardian the sole interpreter of the sacred Writings.

A. According to the Will and Testament of Abdu'l-Baha, yes.

Q. So that means you are the sole interpreter - - -

A. That's right.

Q. - - - of the Baha'i sacred Writings?

A. That's right, at this point in time.

Q. Does that include the writings of Shoghi Effendi?

A. Yes, I would say so, yes although those are not the sacred Writings.

Q. Earlier you commented on how Mason Remey had disbanded the NSA in the United States that was under his authority and a Second International Baha'i Council.

A. Right.

Q. Do you have the same power to disband such institutions?

A. Of course.

Q. You created all of the current institutions. Correct?

A. Yes.

Q. I'm going to hand you now what's been marked as exhibit 173. Do you recognise this letter?

A. No, I do not.

Q. Please take a moment and review it. It's addressed to you and it's from a Mary Magdalene Wilkin. Do you recognise that name?

A. Yes, I remember her. Exactly, yes. I don't - I remember little but I remember her. She, by the way, didn't accept my guardianship in the end, she accepted Donald Harvey.

Q. So at this point she had accepted you, however.

A. Apparently so.

Q. In this letter, would you agree that she's asking you for help with respect to her deductions with the US Internal Revenue Service in connection with her religious contributions?

A. She was asking my - yes, my recommendations, yes.

Q. It states there that the Internal Revenue Service has questioned her income tax return regarding her contribution to her religion.

A. Yes. This is 1969, yes.

Q. If you continue on, she states that she

accidentally made her contributions to Mason Remey by name rather than to her religion the orthodox Baha'i faith. Do you see that?

A. Where was that?

Q. Where she says - - -

A. "I'd make out the cheques to a person rather than to the orthodox Baha'i faith," yes.

Q. You say that you don't recall this letter.

A. Not at all.

Q. Do you recall responding to it?

A. Not at all. I remember her, but I don't remember the letter.

Q. I've got what's been marked as exhibit 174 for you. It's two pages. This appears to be your response - her letter was dated 10 September - correct? - and you're referencing that in a cover letter. Do you see that?

A. It's to whom it may concern, yes, not to her specifically.

Q. It states that you hasten to send her the enclosed statement which you trust will be of some help in getting the Internal Revenue Service to recognise contributions. Do you see that?

A. Yes, yes.

Q. Then if you turn to the enclosure that you

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provided to her, do you see in the first paragraph you describe yourself, the undersigned, as the successor guardian or head of the Baha'i World Faith.

A. Right.

Q. Does any of this remind you of this letter at this point?

A. No, not at all. I don't remember.

Q. If you could, please, look at the second paragraph of your letter.

A. Yes.

Q. It states that in view of the extremely advanced age of the second guardian he was unable to continue essentially and so you assumed the third guardianship. Is that an accurate description of what happened?

A. 1970. You see, 1970 was subsequent to my proclamation of 12 November 1969 as third Guardian of the Faith,you see, so I could make that statement then. I couldn't have made it previously.

Q. I see. So that's an accurate statement. If you could please direct your attention to the last paragraph of the page.

A. Yes.

Q. It states that Mrs Wilkin is an enrolled member of the Orthodox Baha'i Faith and that any

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contributions which she would have made in the year 1969 to Charles Mason Remey as second Guardian would have been used by him for the worldwide religious activities of the Orthodox Baha'i Faith, "[also referred to as the Baha'i Faith under Hereditary Guardianship]." Do you see that?

A. Actually ..... "also previously referred."

Q. So that's accurate.

A. Well, previously referred to as, yes.

Q. So there's continuity between the Orthodox Baha'i Faith and this Hereditary Guardianship group. They're essentially the same thing, aren't they?

A. Well, what do you mean by "continuity?"

Q. It says here that the contribution to Mason Remey as head of the Orthodox Baha'i Faith is the same as Baha'i Faith under Hereditary Guardianship.

A. I was talking about the Guardian. He was the Guardian and I'm the Guardian - the successor Guardian, so in that sense there was continuity, but I don't recognise the continuity with the Assembly per se.

Q. I'm sorry, I don't understand the last part of your statement.

A. I don't recognise there was a continuity between us and that Assembly. That was dissolved.

Q. Isn't that what it says here, "Any

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contributions which she would have made in the year 1969 to Charles Mason Remey as second Guardian of the Baha'i Faith would have been used by him for the worldwide religious activities of the Orthodox Baha'i Faith [also referred to the as the Baha'i Faith under Hereditary Guardianship]."

A. Well, he referred to it as that, you see. He referred to it as that. I'm referring to contributions as the successor Guardian. You know, I accept that, but that referral to the Baha'i Faith was - that was his designation, it was not my designation. I say, "also referred to" ..... because she had recognised - accepted Mason Remey so she recognised that - she had recognised that body, so that's what I'm talking - the body he referred to as the - under Hereditary Guardianship.

Q. Here the purpose of this letter is to explain to the Internal Revenue Service that you're now the head of that religious group and you're explaining - - -

A. Orthodox Baha'i Faith. I'm the head of that body.

Q. The purpose of - - -

A. I have hereditary Guardianship, as I explained before, but because - these people, talking about an

official body, they probably would be interested in the legal inheritance. The hereditary Guardianship was passed on legally to Donald Harvey.

Q. You didn't say that in this letter.

A. I didn't elaborate, no.

Q. Well, this letter was to the Internal Revenue Service. Right?

A. To whom it may concern. It's addressed to whom it may concern.

Q. Right, and the cover letter says, "This enclosed statement will help you in getting the Internal Revenue Service to recognise this contribution."

A. Well, from their standpoint they would be interested in the legal standpoint, hereditary Guardianship. From a legal standpoint, I say that's what they recognise, you see. They consider it from a legal standpoint, they don't consider it from a religious - a spiritual standpoint.

Q. Right. So you're responding in a legal capacity, that you're the successor Guardian. Correct?

A. Well, no, I - from a legal standpoint I couldn't say that because this was 1970, and in 1969, Mason Remey appointed Donald Harvey as his successor, so I probably was - I probably should not have made

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that statement in that parenthetical entry, it's confusing.

Q. Have you made other statements like this during that time?

A. I don't recall.

Q. So in order for her to get a tax deduction from the Internal Revenue Service - - -

A. She would have to probably do it that way. She would probably have to do it that way.

Q. But now you would change that statement.

A. Yes, I would.

Q. Based on the legal/spiritual distinction you explained earlier.

A. Based on my - based on my reflection on this more closely.

Q. The reflection - - -

A. I see the definite distinction between the legal ramifications and the spiritual ramifications, you see.

Q. That's the distinction that you explained earlier that you arrived at after this contempt proceeding began, between spiritual and legal.

A. Well, perhaps - yes, I wasn't induced to think about that distinction before probably.

Q. In this letter in the paragraph just above the

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one where you certified her enrollment - - -
A. What's that?
Q. See the second to last paragraph?
A. Yes.
Q. Have you had a chance to review that?
A. Yes.
Q. It states - and this is the letter provided for the Internal Revenue Service - that there are two groups of Baha'is.
A. Yes.
Q. What two groups are you referring to there?
A. I'm referring to those as part of my Guardianship, and the international body who serves as the collegial head of the Faith is the so-called Universal House of Justice, which is that body of nine members. They have no Guardian at its head, so they actually are assuming a collegial headship of the Faith.
Q. You're referring to the Universal House of Justice - - -
A. So-called, yes.
Q. - - - in Haifa, Israel.
A. Yes.
Q. Did you mention in this letter anywhere that one of those groups had been enjoined from calling

itself the Baha'i Faith in the United States?

A. Do I mention in this letter?

Q. Right.

A. I don't know? Is it here? I haven't read the whole letter. Where does that appear? Could you repeat your question?

Q. Did you communicate with this letter to the Internal Review Services that one of the groups you referred to there had been enjoined from calling itself the Baha'i faith in the United States?

MR GOLDBERG: I have to object to the question, it seems to be implying a fact that's not in evidence.

BY MR DOLAN:

Q. What is that fact?

MR GOLDBERG: That he's referring to an Organisation that was enjoined. I don't believe he's testified that he's referring to an organisation that was enjoined.

A. I - I can't - I can't find that reference, if you can point out what paragraph it is in?

Q. That's okay, I don't - I don't believe it's in the letter.

A. Oh.

Q. So in your - as of September 14, 1970 there were two groups, as you stated, your group, they

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recognised your Guardianship. And then the other group you refer to would be my client and the Universal House of Justice of Baha'i.

A. Right.

Q. - - - and the Universal House of Justice in Haifa?

A. Right, the illegitimate Universal House of Justice -- because I have to get that dig in.

Q. I'm handing you now what has been marked as exhibit 175. Do you recognise this document?

A. I don't remember it but I - I mean it's obviously mine.

Q. Is it an announcement of a visit of yours to the States in 1972?

A. Right.

Q. You make a statement here that you were requesting no publicity about this visit. Do you know why you would request no publicity?

A. No, I don't, I don't know why I would.

Q. Do you recall if you - is this the time when you met Frank Schlatter?

A. I think it is. I forgot the date but it must be, yes.

Q. Was this about the time that you made him Secretary of the National Bureau as well?

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A. I'm not - I'm not sure about that, I'm not sure about that date, quite frankly. I'm not sure about that date. No, I'm not sure. Well, you see, the Bureau was - was established in 1970 and it was in New York city originally. After two years it was transferred to Albuquerque and that would make it - and I think when I was transferred, that when it was - became feasible to appoint Frank as the secretary.

Q. Do you recall if you discussed that with him during this visit?

A. I don't - I don't recall that at all.

Q. Did you make frequent visits to the States?

A. Well, I - my - my - two of my sons were living in the States so I would go fairly frequently to visit them.

Q. Yes.

A. I say "frequently" meaning every one or two years, I mean maybe every year to visit them.

Q. Would you meet with those who had accepted you as their Guardian on those visits?

A. No, I - I never - I never went to meet the Baha'is at that time. I only met them on one occasion, as I remember, at this - I can't recall a date even, a visit.

Q. Okay. I'm handing you now what has been

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marked as exhibit 176. If I could direct your attention to the second paragraph?

A. Yes.

Q. Or first, do you recognise this as one of your letters?

A. Well, it is essentially but it's - it's typed on a - it's typed on a type of typewriter which I used at that time.

Q. And my understanding is this was - - -

A. Switzerland, yes, 4 January.

Q. - - - produced by Franklin Schlatter.

A. I see, okay.

Q. Why were you in Switzerland during the 1973 period?

A. Well, Mason Remey had - had suggested the Baha'is because of his firm belief that as a catastrophe was impending that would submerge a great part of the world under water that we go to high ground so when we received this word from Mason Remey I went to Switzerland and bought a - and bought a house there, a chalet, in - in Interlaken, Switzerland and that's the reason why I went to Switzerland.

Q. Was that - - -

A. I'm - no, I couldn't - initially, I couldn't live there because I was still working in the Army but

I moved there in 1961.

Q. So you - - -

A. From Germany.

Q. - - - you also lived in Germany at the time?

A. I lived for five years in Germany, from - I moved to Germany in 1968 and then I retired in Germany. In 1973 I retired in Germany and then I was a civilian, that's my civilian retirement. And then when I retired I was able to - I - I bought the chalet ahead of time, I bought the chalet in 1961 in Switzerland but I couldn't - I only used to go there on - on - when I had vacation periods and in winter time for my sons to ski and - but I couldn't move there until I retired in '73.

Q. Do you see in the second paragraph that you were reminding the reader that your proclamation issued, after it had been elicited as a result of a quest that had been launched. Do you know what - do you recall what you're referring to there? It states that some - a few believers advised you that they thought you were the Guardian.

A. I don't remember saying this but what is your question?

Q. Do you recall who those people were?

A. No, I do not.

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Q. Were they in the Rex King group of followers?
A. It wouldn't be in - it wouldn't be in - in a group of his followers because they were all young people who would have been brought in by him and they never corresponded to me, only Rex King corresponded with me on occasion.
Q. I'm going to hand you what has been marked as exhibit 177. Again, my understanding is this is a document prepared by Frank Schlatter of one of your letters. Do you - - -
A. Copied, yes.
Q. Do you recognise it as one of your letters?
A. Yes, it's my phraseology.
Q. If I can direct your attention to the fourth paragraph. It starts, "The members of"?
A. Yes. Yes, right.
Q. So could you explain what was going on here with these appointments?
A. Well, you know the National Bureau was first established in New York city, as I mentioned previously, with only four members and it was just a - as I was living in Europe and I wanted to make- contact with the Baha'is in the United States for Guardianship I had to have some agency and executive under my control that could transmit my information and

instructions to them and so I established the Bureau. It was not an administrative - it had no jurisdiction - over anyone. It did publish a newsletter from time-to-time and - and then I transferred it after two years to New Mexico, that's when I appointed these members as the replacement for the original for the original four members of - of that Bureau. That's - that's the story.

Q. Was Anita Romero involved with the group under Mason Remey?

A. I'm glad you asked that because I can't remember her at all. I just cannot remember her. The others I know.

Q. I'm going to hand you now, it has been marked as exhibit 178. It is a Star of the Covenant publication.

A. Oh, yes.

Q. Do you recognise this?

A. Yes.

Q. And this appears to commemorate Frank Schlatter's retirement from his post as secretary.

A. Mm.

Q. Do you see the first full paragraph where - - -

A. "I would like to take this opportunity"?

Q. Yes. Do you see where you state that he has: *His efforts were highly meritorious in a secretarial capacity during some four decades while a member of the provisional national administrative bodies of the Faith established in the United States under the Guardianship.*

A. Yes.

Q. So this announcement is dated November 2001, correct?

A. Yes, I established the council, the PNBC in 2000.

Q. So four decades from then would be 1961, is that right?

A. Mm.

Q. So he served as a secretarial capacity for the provisional national administrative bodies from the 60s through to 2001?

A. Well, he also was - he served as secretary of the Mother Baha'i Council which had preceded the PNBC which - in Roswell, New Mexico and because at that time we - there were nine members, on the Local Council in Roswell, I appointed them as the Mother Baha'i Council, giving them a national administrative responsibility.

Q. So that is an additional secretarial position that he had that you're referring to?

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word.

Q. Do you know where this pamphlet was distributed?

A. This one?

Q. Mm.

A. No, I don't. I do not know what that distribution was, quite frankly. I received a copy at the time but - I have a copy of that but - but - I have it with me.

Q. Do you recall if your sons were involved with its distribution?

A. No, they didn't - definitely, no, no.

Q. I'm going to hand you what has been marked as exhibit 43B.

A. Yes.

Q. Do you recognise this?

A. Yes.

Q. And is this your book?

A. Well, you can consider it my book.

Q. You're the author of this?

A. Well, no, I'm not the author, yes, I'm author of many of the - of the - the letters and so forth that are shown in here but actually, my son Mark Marangella prepared it.

Q. Well, it has attribution by Joel B.

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Marangella on the cover, doesn't it?

A. He put it that way because I think almost - almost everything in there is my - articles - I'm the author, with a few exceptions. I mean there is a few things from Mason Remey ..... and Shoghi Effendi.

Q. I see, it is a compilation.

A. Well, yes, mostly my - my writings, including - including letters to Ruhiyyih Khanum, the widow of Shoghi Effendi, whom I knew very well.

Q. And who did you say prepared the compilation?

A. Mark Marangella, my - my middle son.

Q. And do you know where this book has been distributed?

A. It was - it was sent - the Library of Congress recognised it, it's the Library of Congress number, and they've acknowledge their receipt of it with thanks and then copies were sent to the National Baha'i Council and they've asked one of their members to contact various university libraries or other libraries of state universities to place it in the - in the library. The Library of Congress acknowledges receipt with thanks, appreciation, they've put a number on it and it has an IBS number.

Q. Do you know if any of those universities and libraries were in Illinois?

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Q. Is the third International Baha'i Council intended as a precursor to another administrative body?

A. Well, it would be the - it would go through the same evolutionary process that Shoghi Effendi announced or proclaimed in his 9 January 1951 message to the Baha'i world, it would be a four-fold stage of development, as he outlined, for the first international council. It would become, he said, firstly, council, secondly, the international Baha'i court, third, an elected body and fourthly, universal justice and wouldn't expect that - wouldn't expect that stage to be reached until the distant future, Universal House of Justice. Because justice, as the name implies, infers that the justice will be applied to a Baha'i adherents to the Faith and it can't do that now, no country has accepted the authority of the Universal House of Justice to administer justice to their adherents.

Q. If that body had formed out of the second International Baha'i Council that you were president of - - -

A. Which body?

Q. The House of Justice that you just referred to. Would there have been any need for a third International Baha'i Council?

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A. Well, in the first place, as I said before, the Universal House of Justice is a body that will be established in the distant - distant future or when they can administer justice to Baha'i adherents to the Faith which they cannot do now so that term will never be applied at this time, to anybody, by me or by my successor until that - that time comes when they can - can in fact Shoghi Effendi had asked that they endeavour to establish six national Baha'i courts in - in countries of the Middle East or Islamic East, as you put it, Islamic East, because he was hopeful that if they - a Local House or Local Councils or not Councils, courts of justice could be established in those six cities then the international court would be able to - would be the superior of those local courts in the administration of justice to the adherents but that never took place, they never established those - either - either the international - the international court or the - or the local courts, cities.

Q. So if the second International Baha'i Council that you were president of had evolved into those institutions would there be a need for the third International Baha'i Council?

A. The - if the second International Baha'i Council had remained in - in being and had become a

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court, in a way, going through the stage of evolution that Shoghi Effendi pointed out, there would be no need for the appointment of another body.

Q. There would be no need for appointment of a third International Baha'i Council?

A. No, no.

Q. I will hand you now what has been marked as exhibit 181. Would you like a break?

A. Yes.

Q. Okay. Could we go off the record please?

A. Can we have a break for lunch?

Q. Definitely.

A. Because we've been invited by someone who lives nearby.

OFF THE RECORD

RESUMED

MR MARANGELLA: Let the inquisition begin.

MR DOLAN: We're about to go on the record.

MR MARANGELLA: Sorry.

MR DOLAN: It is now 1.55 pm and we're back on the record.

BY MR DOLAN:

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