EXHIBIT 19

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

THE NATIONAL SPIRITUAL ASSEMBLY OF
THE BAHAI'S OF THE UNITED STATES OF
AMERICA UNDER THE HEREDITARY
GUARDIANSHIP, INC.,

Counter-Defendant,

vs. Civil Action No. 64 C 1878
The Honorable Amy J. St. Eve
NATIONAL SPIRITUAL ASSEMBLY OF
THE BAHAI'S OF THE UNITED STATES
OF AMERICA, INC.,

Counterclaimant.

VIDEO DEPOSITION OF MARILYN K. MEYER
April 18, 2007
9:04 a.m.
Bean & Associates, Inc.
500 Marquette, N.W., Suite 280
Albuquerque, New Mexico 87102

PURSUANT TO THE FEDERAL RULES OF CIVIL
PROCEDURE, this deposition was:

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A P P E A R A N C E S

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Also Present:
JAMES A. MEYER
DALE ALVERSON, Videographer

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THE VIDEOGRAPHER: We are on the record. The date is April 18, 2007. The time now is approximately 9:04 a.m. Mountain time. This is the videotaped deposition of Marilyn Meyer in the matter of the National Spiritual Assembly of the Baha'is of the United States of America Under the Hereditary Guardianship, Incorporated, versus National Spiritual Assembly of the Baha'is of the United States of America, Incorporated, Case No. 64 C 1878, in the United States District Court for the Northern District of Illinois, Eastern Division.

We are in the offices of Bean & Associates at 500 Marquette, Northwest, Suite 280, Albuquerque, New Mexico, 87102. The videographer is Dale Alverson. The court reporter is Jan Williams.

Will the attorneys please introduce themselves for the record.

MR. DOLAN: Christopher M. Dolan for National Spiritual Assembly.

MR. GOLDBERG: And Jeffrey A. Goldberg for the orthodox Baha'i, respondents.

THE VIDEOGRAPHER: Thank you. And will the reporter please swear in the witness.

MARILYN K. MEYER,
after having been first duly sworn under oath,

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was questioned and testified as follows:

EXAMINATION

BY MR. DOLAN:

Q. Good morning, Ms. Meyer.

A. Good morning.

Q. Could you state and spell your name for the record, please.

A. My name is Marilyn, M-a-r-i-l-y-n, middle initial K, last name M-e-y-e-r.

Q. And what is your home address?

A. Number 6 Meyers Road, Espanola, New Mexico, 87532.

Q. Have you ever been deposed before?

A. No.

Q. Okay. Just to give you a little background, how this works is I'll be asking you questions and you provide the answers and the court reporter here takes down the record of what you say. Your counsel may object to a question that I put to you. And you still answer the question, that's merely for the record, unless he specifically directs you not to answer.

We'll take regular breaks, you're free to ask for one at any time, it's not a marathon or anything like that. The only thing that I'll ask is that, if there's a question pending, we complete the answer

before you take a break. Do you understand all that?

A. Yes, I do.

Q. Okay. Did you review any documents prior to today's deposition?

A. Yes, I did.

Q. Okay. What documents did you review?

A. Where would you like to start?

Q. You could tell me generally.

A. Generally.

Q. The types of things you looked at.

A. The general history of the faith, beginning prior to Mason Remey's assumption of the second guardianship right on up through the present.

Q. Okay. Did you look at documents that were produced in discovery in this case?

A. Yes, I did.

Q. Okay. Did you communicate with anyone regarding the substance of your testimony today?

A. Define anyone.

Q. Did you communicate with Jim Meyer, for example?

A. Yes, I did.

Q. Okay. Joel Marangella?

A. No, I did not.

Q. Franklin Schlatter?

A. On occasion.

Q. Okay. And I would guess Jeffrey Goldberg?

A. Jeffrey.

Q. Okay. The court reporter will hand you a document that's been marked as Exhibit No. 30. I've got a copy for counsel there as well.

(Exhibit No. 30 was marked.)

BY MR. DOLAN:

Q. Do you recognize this document?

A. Yes, I wrote it.

Q. Okay. It's titled Our Story. And if I could ask you to turn to the third page of this document. Do you see, down at the bottom of the first large paragraph, where it states "We take great pride in being among the first to recognize Mason Remey as a second Guardian of the faith of Baha'u'llah"?

A. Page 3, where down?

Q. It's down at the bottom of the very first paragraph.

MR. GOLDBERG: It's towards the bottom, here.

THE WITNESS: Right in here?

MR. GOLDBERG: Somewhere in there.

THE WITNESS: All right. Where do I find it?

MR. DOLAN: It starts with we take.

MR. GOLDBERG: We take on the right-hand

side.

THE WITNESS: Oh, okay. Great pride. Okay.

BY MR. DOLAN:

Q. There you go.

A. Yes.

Q. That's accurate that you were among the first to recognize Mason Remey?

A. Yes, it is.

Q. And it goes on further to state that you had met -- you met with him in Quincy in early 1961; is that correct?

A. That's correct.

Q. Prior to 1960 or 1961, were there any other guardians?

A. Shoghi Effendi was the guardian prior to that.

Q. Okay. Was he the only other one?

A. Yes.

Q. Or were there others?

A. No.

Q. Okay.

A. Shoghi Effendi was the first guardian and at that time the only claimant.

Q. Okay. Just below that, you'll see, it says there was a First National Convention of the Baha'is

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1 Under the Hereditary Guardianship in Quincy in 1961.
2 Do you see that? It's just two lines below that
3 paragraph.
4 A. Two lines.
5 Q. Third paragraph.
6 A. Oh, yes. All right.
7 Q. Okay. Do you see that?
8 A. Yes, I do.
9 Q. Who attended that first convention, if you
10 can recall?
11 A. I did not.
12 Q. Okay.
13 A. Because it was held on April 21st and my son
14 was born on April 17. So I do not know who attended
15 that convention. I did not.
16 Q. But Mason Remey was there?
17 A. I can't say that since I didn't attend. I
18 saw Mason Remey, you know, prior to that. But I don't
19 know.
20 Q. Okay. Why was he in Quincy in early 1961
21 prior to the convention?
22 A. The Quincy group was one of the early
23 supporting groups to Mason Remey. And I think a
24 personal visit was his prerogative to his supporters.
25 Q. Do you know if he was in town to attend that

1 convention?
2 A. I do not know.
3 Q. Do you know if Franklin Schlatter attended
4 the convention?
5 A. No, I do not.
6 Q. Okay. Do you see, just below that paragraph
7 that you looked at, it states that "At Mr. Remey's
8 suggestion many of us relocated to the Rocky Mountain
9 area"?
10 A. Yes.
11 Q. Do you see that? Prior to that where did you
12 live?
13 A. In Quincy -- well, not in Quincy. In Melrose
14 Township.
15 Q. Okay.
16 A. It's been awhile. Melrose Township, which is
17 outside of Quincy.
18 Q. And was it in 1961 that you relocated to the
19 Rocky Mountain area?
20 A. Yes, it was.
21 Q. And what town did you relocate to?
22 A. Well, our mailing address is Espanola. It's
23 really out in the country so it's not a town.
24 Q. Okay. And that's -- you went straight to
25 that location --

1 A. Yes, we went straight to that location.
2 Q. And that's the address you gave previously?
3 A. It was previously known as Route 1, Box 211,
4 Espanola.
5 Q. But it's the same location?
6 A. It's the same location.
7 Q. So the people that recognized Mason Remey as
8 the second guardian in the early sixties, did they
9 then form a group?
10 A. There was not a group to begin with, it was
11 individuals who were investigating the claims.
12 Q. And did those individuals coordinate with
13 each other?
14 A. We were in contact with each other
15 frequently.
16 Q. Okay. If you could take a look again, this
17 time at the top of the page 3.
18 A. Okay.
19 Q. It mentions, the very first line,
20 "Fortunately for us, friends from Peoria, Illinois,
21 and Joplin, Missouri," were involved with this
22 proclamation of Mason Remey?
23 A. Yes, uh-huh.
24 Q. Who were those friends?
25 A. Let's see, Peoria was Marion Rhodes, Frank

1 Schlatter, Carole Schlatter. There was another
2 person, but I don't remember the name.
3 Q. Okay.
4 A. Joplin, Missouri, was Leland Jensen and his
5 wife and several others.
6 Q. What was his wife's name?
7 A. Opal.
8 Q. And do you recall any of the others that were
9 with the Joplin group?
10 A. I do not.
11 Q. Okay. So this group of individuals
12 eventually formed a corporation; is that correct?
13 A. The group of individuals did not form a
14 corporation until after 1964 or '65.
15 Q. Okay. But, in between 1960 to '64, they
16 worked together in trying to explain that Mason Remey
17 was the second guardian; is that correct?
18 A. Yes. And Quincy actually had enough
19 believers to keep its local spiritual assembly status,
20 that being nine or more. And I believe Joplin also.
21 Q. You mean, when you say keep its local
22 spiritual assembly status, you mean under Mason Remey?
23 A. Yes.
24 Q. Not under --
25 A. Yeah, not under the -- no, under Mason Remey.

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Q. Okay. Because had they lost their status as local spiritual assembly under the Wilmette, Illinois, and Haifa, Israel, group?
A. I believe they had because they were -- what's the word I want. Thrown out for better -- want of a better word. They had no status under the NSA of --
Q. Okay. Could we refer -- as a definitional matter, can we refer to the group of people that organized to support Mason Remey's claim to the guardianship as the guardianship group. Is that acceptable?
MR. GOLDBERG: Yes.
MR. DOLAN: Okay.
MR. GOLDBERG: And we can call your client the Wilmette NSA family for convenience's sake.
BY MR. DOLAN:
Q. Would a person who -- to be involved with the guardianship group and accepted into that group of people, would the person have to express their belief in the hereditary guardianship principle and accept Mason Remey as guardian?
A. Have to accept their belief -- express their belief in the guardianship principle, yes. And accept Mason Remey as guardian, yes.

Q. And were you a resident in the United States throughout this whole period, from 1960 to '65?
A. Yes.
(Discussion off the record.)
BY MR. DOLAN:
Q. You mentioned the corporation at the guardianship group formed earlier. Do you remember what it was called?
A. To the best of my remembrance, it was called the National Spiritual Assembly of the Baha'is Under the Hereditary Guardianship of the United States of America.
Q. I think the caption -- that's very close. But if this refreshes your memory maybe, the National Spiritual Assembly of the Baha'is of the United States of America Under the Hereditary Guardianship, Inc.; does that sound right?
A. (Witness nods head.)
Q. Okay.
MR. GOLDBERG: You have to answer out loud.
THE WITNESS: Yes.
BY MR. DOLAN:
Q. Was the corporation the national administrative institution for the guardianship group?
A. Yes, it was.

Q. And do you recall if the corporation under the guardianship kept membership lists?
A. I was not a member of that organization until later. And, if they were kept, they were kept by the secretary. So, therefore, I don't know.
Q. When you say that you were not a member of that organization until later, are you referring to the corporation itself?
A. Oh, not -- I'm referring to the NSA under the guardianship.
Q. Okay. And can you explain please what the NSA is?
A. The National Spiritual Assembly?
Q. Uh-huh.
A. According to Baha'i administrative laws?
Q. Yes. That's -- just what this entity was in 1964, 1965, that was called the NSA. You said you didn't really join it until later?
A. No, not join it, become a member. I didn't serve on it.
Q. Okay. How many members did it have?
A. They -- nine.
Q. Okay. And prior to that, I guess here is the way to do it, was the NSA -- its main function was to provide an administrative body for the guardianship

group that followed Mason Remey; is that correct?
A. Yes.
Q. And you were in that general group, correct?
A. I was in the general group, yes.
Q. Right. And then later you became one of the nine member --
A. Yes.
Q. Nine members of the NSA; is that correct?
A. That's correct.
MR. GOLDBERG: Can I make a suggestion. That, when we refer to somebody who is serving in a leadership capacity on the NSA, that they be called NSA members. And that, if you're talking about people who are general members of the organization, maybe group members or something like that, because it gets confusing. The word member is confusing.
MR. DOLAN: I think that will work well.
MR. GOLDBERG: Yeah.
BY MR. DOLAN:
Q. Okay. And do you recall if the NSA kept membership lists?
A. Not -- I have no personal knowledge of those membership lists.
Q. Okay. Do you recall if the group, before it formed a corporation, kept membership lists?

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A. There was no group before it, with the exception of the local spiritual assembly in Quincy, Joplin, and eventually in Santa Fe.
Q. Okay.
A. But there was no corporation before that.
Q. Right. So did the organized group of people that followed the guardian before they incorporated, did they coordinate and keep lists of members?
A. Someone must have. Not me.
Q. Okay.
A. I don't know.
Q. Do you recall if there were mailing lists with addresses of the members of the guardianship group?
A. Mailing lists with addresses? I don't know.
Q. Okay. Do you recall a publication called the Glad Tidings?
A. Yes.
Q. Okay. And who was that publication distributed to?
A. Those who had pledged their allegiance to Mason Remey.
Q. And so those people had provided their addresses and the Glad Tidings was sent to those addresses, correct?

A. Yes.
Q. Okay. Did you help to distribute the Glad Tidings to members?
A. To the best of my knowledge at this time, no.
Q. Okay. Do you recall being on a committee called the reproduction and distribution committee?
A. Yes.
Q. And did you maybe in connection with that distribute the Glad Tidings to the membership?
A. I don't think so. The Glad Tidings came out of first Lancaster and then Las Vegas.
Q. Did you contribute material to the Glad Tidings?
A. Possibly, I don't remember.
Q. Who would you say did distribute the publication?
A. As I said it was distributed out of Las Vegas, New Mexico, Mr. Rex King being the producer and editor.
(Exhibit No. 31 was marked.)
BY MR. DOLAN:
Q. The court reporter is going to hand you a document that's been marked as Exhibit 31. And it bears Bates No. OBF 6462. Do you recognize this document?

A. Yes. Well, I won't say I recognize the document. I recognize many of the names and I recognize the date.
Q. What is this document?
A. It purports to be a mailing list.
Q. And does it go on further to say for National Conference of Baha'is Under the Guardianship Residing in the United States of America?
A. Yes, it does.
Q. If you look through this, those names appear to be people that were in that group during that period?
A. Yes.
Q. Okay.
(Exhibit No. 32 was marked.)
BY MR. DOLAN:
Q. The court reporter is going to hand you another document. This one is marked Exhibit 32 and bears Bates No. OBF 5420. Ms. Meyer, do you recognize this document?
A. The document per se?
Q. Yes.
A. No.
Q. Do you have an understanding of what this might be?

A. Yes, it is, it's a mailing list.
Q. Okay. Can you determine from looking at it what period it might be from?
A. It would be from the early period, after the declaration of Mason Remey.
(Exhibit No. 33 was marked.)
BY MR. DOLAN:
Q. Ms. Meyer, the court reporter is now handing you another exhibit, it's No. 33, and it bears Bates No. OBF 177. Do you recognize this document?
A. I recognize it as a mailing list, yes, uh-huh.
Q. Okay. Is this the -- a listing of Adult Baha'is of the United States of America Under the Hereditary Guardianship dated January 1966?
A. To the best of my knowledge.
Q. Okay. Thank you. Do you recall if the guardianship kept separate voting lists apart from membership lists?
A. Wait a minute. I'm thinking. Separate voting lists. I believe every -- believe every adherent was entitled to a vote.
Q. Was that based on age?
A. No.
Q. There was no age cutoff?

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A. Oh, I beg your pardon. Anyone under 15 was not allowed to vote. And I'm not sure about the 15. Fifteen is the age of declaration for Baha'i. But I'm not sure how it corresponded with voting rights. So there might be some question of age.
Q. Okay. Thank you.
(Exhibit No. 34 was marked.)
BY MR. DOLAN:
Q. The court reporter is handing you Exhibit No. 34. It bears Bates No. OBF 6465. Now, do you see this purports to be a Voting List of Adult Believers of the American Baha'i Community Under the Hereditary Guardianship as of December 1964. Have you seen this document before?
A. I have seen these documents before, when we responded to the discovery. We pulled them out of the files.
(Exhibit No. 35 was marked.)
BY MR. DOLAN:
Q. The court reporter is handing you Exhibit No. 35. And it bears OBF 1497. Have you seen this document before?
A. I don't believe I have seen this particular document.
Q. Do you recognize what it is?

A. I recognize what it is, yes.
Q. What is it?
A. It's a list of delegates chosen by the friends at large to attend the national convention.
Q. What do you mean by friends at large?
A. Well, what did we say we were going to call them?
Q. The guardianship group --
A. The guardianship group, yes, these are -- yes. These are delegates chosen by the guardianship group to attend the convention and elect the National Spiritual Assembly for the coming year.
Q. Okay. You'll notice some of the names listed are underlined. Are those people that were, in fact, elected, if you know?
A. Elected to --
Q. To the NSA.
A. No. There's too many.
MR. GOLDBERG: This is different years. I'm sorry.
BY MR. DOLAN:
Q. That's okay.
A. No, there's only nine that could be elected to the NSA. And there's many more underlined here.
Q. Okay. Well, if you take a look from left to

right.
A. Okay.
Q. It appears to me that this is a list of delegates and electees from 1963, then from 1964, then from 1965 --
A. Oh, I wasn't reading it correctly.
Q. -- and 1966.
A. All right.
Q. Is that correct?
A. I understand what you're saying. I would have to look it over.
Q. Take your time.
A. It seems to be as I remember it.
Q. Thank you.
(Exhibit No. 36 was marked.)
BY MR. DOLAN:
Q. The court reporter is handing you Exhibit No. 36. It bears OBF 170. Do you recognize this document?
A. I have probably seen it before.
Q. It's titled Names of Elected Delegates to the National Convention of the Baha'is of the United States and dated April 27 and 28, 1963; is that correct?
A. Yes.

Q. And it states that that national convention was held in Santa Fe, New Mexico; is that correct?
A. Will be held, not was, will be.
Q. Okay. I see. Do you recall if it was held there?
A. Yes, it was.
Q. If you go a couple pages in, you'll see what is described as a voting list of the Baha'is Under the Hereditary Guardianship.
A. Okay.
Q. If you could take a couple moments to look through that document and that list and please let me know if that looks like an accurate voting list from those days, please.
A. I can't attest to its accuracy. But it looks -- it has familiar names on it.
Q. Okay. And this came from your files, correct?
A. Yes.
Q. You mentioned earlier that you were a member of the NSA which is the leadership of the guardianship group. Did you hold any other leadership positions?
A. I never held a leadership position except as a member of the council, in which there are no leaders.

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Q. And, when you say council, you're referring to the NSA?
A. I beg your pardon. NSA.
Q. Did you have a vote on the council?
A. Yes.
Q. Did each member have a vote?
A. Yes.
Q. Are they equal?
A. Equal.
Q. Did you have any titles on that board in terms of officer type titles?
A. No.
Q. Did you have any other positions in the guardianship group generally?
A. You'll have to give me a date.
Q. Okay. From 1960 to 1966.
A. Okay. What was the question again? Did I have a --
Q. Did you have any other offices, titles, leadership positions within the guardianship group?
A. I had no titles, I had no leadership position. We did do some of the distribution and reproduction. So I was -- served on a committee.
Q. Okay. And that distribution and reproduction, did that relate to newsletters?

A. Yeah.
Q. Okay. Who worked with you on those tasks?
A. James did and my family did and the members that were residing within a reasonable distance of our home.
Q. Okay. Could you provide names of those other people.
A. Oh, yes.
Q. Thank you.
A. Let's see. I think Herb and Myra Keller of Los Alamos, Eunice and George Hanawalt of Los Alamos. Do you want the names of the area that helped us too? W.B. Patzer, Jim's parents, Mr. and Ms. Alfred Meyer. Let me see. Who else would come up and help. That's pretty much it.
Q. Okay. Thank you.
A. As I said with the help of my children.
Q. Okay. What were your children's names?
A. Rebecca Meyer, Jean Meyer.
Q. Thanks. Were there local spiritual assemblies in New Mexico in the period between 1963 and 1967?
A. I believe Santa Fe was.
Q. Were you on any of the local spiritual assemblies?

A. No. Well, I couldn't be on them if they didn't exist except for Santa Fe, yeah.
Q. Who would have been on the Santa Fe local spiritual assembly, if you recall?
A. Oh, dear heaven. Some people named Herman, two of them, husband and wife. Grace Behrens, Charles Gaines, Britton.
Q. What was the first name for Britton?
A. Mr. and Mrs. Jerry Britton. How many is that?
Q. That's about five or six I think.
A. Five or six.
MR. GOLDBERG: Six.
THE WITNESS: I can't think what those other people's name were. That's about as good I can get you at the moment.
BY MR. DOLAN:
Q. Would you describe what the goals of the NSA under the guardianship were?
A. Twofold. To administer the affairs of the faith and the principal goal was to teach.
Q. What was being taught?
A. Our principal aim was to teach the continuing guardianship of the Baha'i faith.
Q. Is another word for continuing guardianship

hereditary guardianship?
A. That would suffice, yeah.
Q. Was one goal to increase the number of people that recognized Mason Remey as the second guardian?
A. Yes.
(Exhibit No. 37 was marked.)
BY MR. DOLAN:
Q. The court reporter is handing you Exhibit No. 37 bearing Bates No. OBF 472. Do you recognize this document?
A. Yes, I've seen it before.
Q. And what is this?
A. It's the Glad Tidings.
Q. And this is the publication that was put out by the National Spiritual Assembly of the Baha'is of the U.S. of America Under the Hereditary Guardianship, Inc.?
A. Yes.
Q. There's a symbol next to Glad Tidings and a circle with a nine and a nine-pointed star?
A. Yes, right.
Q. What is that symbol?
A. I think it was used by Mason Remey as his personal symbol.
Q. Okay. Did he develop that symbol, if you

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1 know?
2 A. I don't know that.
3 Q. Okay. If you could turn to the last page of
4 this document, please. Do you see in the middle
5 column, towards the bottom, there's a heading.
6 A. Okay.
7 Q. Glad Tidings.
8 A. Okay.
9 Q. And it gives something of an editorial staff
10 it looks like?
11 A. Okay.
12 Q. Where the managing editor was someone named
13 Marita McClymonds?
14 A. Yes.
15 Q. Do you see that?
16 A. Yes, I do.
17 Q. And national news and letters to the editor
18 were to Louise Vorndam. Do you see that?
19 A. Yes.
20 Q. International news was Madeline Byers?
21 A. Yes.
22 Q. Do you see that as well? And then it has a
23 title for yourself and James Meyer, American News
24 Superintendent. Can you explain what that was, if you
25 recall?

1 A. Okay. Let's see. I think we were
2 responsible for gathering and submitting to the
3 publisher news pertinent to the United States and the
4 believers.
5 Q. Okay. Do you see just across from there
6 there's NSA addresses?
7 A. Uh-huh, yes.
8 Q. And there it lists Franklin Schlatter as the
9 secretary. Do you see that?
10 A. Yes, I do.
11 Q. Okay. And if you could look at the third
12 column, National Convention Delegates Elected, please.
13 A. Yes.
14 Q. At the bottom of that news item, does that
15 look like an accurate report of the delegates that
16 were elected that year?
17 A. Again I recognize the names. I can't swear
18 to the accuracy. It looks accurate, but I can't say
19 for sure because I didn't form it up.
20 Q. But this is the Glad Tidings that was sent
21 out to all the believers under the hereditary
22 guardianship?
23 A. Yes.
24 Q. And what was the date on this one?
25 A. '66 I think.

1 Q. What month?
2 A. April 1966.
3 (Exhibit No. 38 was marked.)
4 BY MR. DOLAN:
5 Q. The coat reporter is handing you what's been
6 marked as Exhibit 38. It bears OBF 480. What is this
7 document?
8 A. This is a Glad Tidings published by the
9 National Spiritual Assembly of the Baha'is of the
10 United States of America Under the Hereditary
11 Guardianship, Incorporated.
12 Q. Does this look to be a true and accurate copy
13 of a Glad Tidings as you recall it?
14 A. To me it does.
15 (Exhibit No. 39 was marked.)
16 BY MR. DOLAN:
17 Q. The court reporter is handing you Exhibit 39.
18 A. We're through with this one?
19 Q. We are. It bears OBF 484. And what is this
20 document?
21 A. This is the Glad Tidings published by the
22 National Spiritual Assembly of the Baha'is of the
23 United States of America Under the Hereditary
24 Guardianship, Incorporated, August 1966.
25 Q. Thank you. Do you see on the first page

1 there's a news story, NSA Meets?
2 A. NSA Meets, yes.
3 Q. It states that the NSA met over the Fourth of
4 July weekend, 1966. You were on the NSA at that time,
5 correct?
6 A. Yes, yes.
7 Q. Did you attend that meeting?
8 A. Wait until I read this and I'll tell you.
9 Q. Sure, take your time.
10 A. The article doesn't say where it was held.
11 So I can't say with certainty that I was there.
12 Q. Is there any reason that you wouldn't be at
13 one of these meetings in '66?
14 A. No, there would not.
15 Q. Do you see, in that first paragraph, about
16 halfway down, it says that "Numerous actions were
17 taken"?
18 A. First paragraph halfway down. Yes, I see
19 that.
20 Q. It says "among them was the enlargement of
21 the legal committee to include all NSA members and O.
22 Edward Schlatter."
23 A. Yes.
24 Q. Do you recall that action being taken?
25 A. No.

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Q. Do you have any reason to believe it wasn't taken?
A. No, I do not.
Q. If you could turn in to the second page, please.
A. Hello.
Q. Do you recognize those people?
A. Vaguely. They're so young. Yes.
Q. This page is titled Distribution-Reproduction Service; is that correct?
A. That's correct.
Q. And it pictures I believe yourself?
A. Yes.
Q. And Jim Meyer, Alfred Meyer, and Irene Meyer?
A. That's right. Where is Alfred? I don't see Alfred.
Q. Jean Meyer.
A. Yeah. Oh, there's dad in the back. Yes.
Q. So where was this?
A. It was a -- there was a dwelling, a little office type thing on our property when we bought it. And we used that for purposes like this. So it was a separate building from our home, but it was on our property.
Q. Okay. And that's the home address that you

gave earlier?
A. The Route 1, Box 211 is what was the address at that time.
Q. And what is it that everyone is engaged in here?
A. Well, let's see. It looks as if I am typing. I don't know what Mother Meyer is doing. Jim is running the mimeograph. And then, after something was produced, we would lay it out on the table and assemble it.
Q. Can I ask what a mimeograph is? Is that like a photocopier?
A. Primitive.
Q. Okay.
A. Do you want an explanation of how it works?
Q. No. I don't need the science, just --
A. It was -- it was a method of reproduction.
Q. Okay.
A. Using ink and a typewriter. Okay.
Q. Here the description, it says that Mr. Meyer is stapling pamphlets and Irene Meyer is affixing address labels and Marilyn Meyer is checking mailing lists and typing addresses.
A. Okay.
Q. Jim Meyer is at the mimeograph. Do you see

all that?
A. That's correct.
Q. Okay. And then below there's a Jean Meyer too?
A. That would be my daughter.
Q. Okay. Oh, and Becky Meyer?
A. Becky Meyer.
Q. And Barney Meyer. Do you see all of those?
A. Barney Meyer in the background? Okay. If my son was in the background, he's five years old so.
Q. Okay. And it states that you're filling literature orders from shelves of literature there in the last photo?
A. That's correct.
Q. Do you know when you started this distribution and reproduction service for the guardianship group?
A. To the best of my knowledge, it was after the NSA was formed.
Q. So this was a service for the NSA; is that correct?
A. Yes, right.
(Exhibit No. 40 was marked.)
BY MR. DOLAN:
Q. The court reporter is now handing you Exhibit

No. 40. And it bears OBF 488. What is this document?
A. This is titled Glad Tidings. It has no notation as to who published it. It's dated October 1966.
Q. It looks like -- does it look like the same format as the last few issues we looked at?
A. It looks similar to the format, yes.
Q. Okay. And could you turn please to the last page. Do you see under Glad Tidings again it provides --
A. Changes Format.
Q. Sure. Have you had a chance to review it? Do you see in the second column --
A. Yes, I'm reading, yes. I'm sorry.
Q. Oh, okay. Sure. Do you see in the second column titled Glad Tidings?
A. Yes, I see.
Q. And, at the bottom there, again it indicates American News Supplement, James and Marilyn Meyer, Box 211, Route 1, Espanola. Do you see that down at the bottom?
A. Oh, at the bottom, yes. Yes, I do see that.
Q. These issues of Glad Tidings, they would have gone to all the members of the guardianship group; is that correct?

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A. Yes.
Q. Okay. Could you turn to the second page of this document, please. Do you see the story line there stating NSA Accepts Injunction Terms?
A. I do see that.
Q. Ms. Meyer, are you currently a member of the Provisional National Baha'i Council?
A. Yes, I am.
Q. When did you become a member?
A. Of the provisional -- of the PNBC? In April 2000.
Q. What is the function of the Provisional National Baha'i Council?
A. Again it's to administer the affairs of the faith and to teach.
Q. And the general membership of that faith, how do you describe them? Is that the Orthodox Baha'i Faith?
A. The general membership under the PNBC?
Q. Correct.
A. Are members of the Orthodox Baha'i Faith.
Q. So the relationship between the PNBC and the Orthodox Baha'i Faith is one of administrative national body over a general membership, correct?
A. Yes.

Q. And when did you become a member of the Orthodox Baha'i Faith?
A. It had to be late '69 or early '70.
Q. Okay. Have you heard of the Mother Baha'i Council?
A. I have.
Q. And what was that entity or what is that entity?
A. What?
Q. What is that entity?
A. I'm sorry. I still didn't hear you.
Q. What is the Mother Baha'i Council?
A. The Mother Baha'i Council was an administrative and coordinating body for those believers who accepted the guardianship of Joel Marangella.
Q. Were you a member of the Mother Baha'i Council?
A. I was not.
Q. Were you part of the general membership that accepted Joel B. Marangella as third guardian?
A. I was.
Q. Okay. Did you have any leadership roles in the Mother Baha'i Council?
A. No, I did not.

Q. Do you recall doing anything on its behalf?
A. Yes. I think we served the community, served on a committee responsible for planning conferences. I'm trying to think what else. I think that's about it, service for the MBC.
Q. Did the Mother Baha'i Council later change its name to become the Provisional National Baha'i Council?
A. It changed more than its name, it changed format.
Q. Okay. How so?
A. The Mother Baha'i Council -- let me see. Well, obviously it changed its name. Oh. The Mother Baha'i Council was principally members in one committee to the No. 9 who were a local spiritual assembly and then served as Mother Baha'i Council. The PNBC, when it was formed, the membership was from varied places, not one community.
Q. What was that community that the Mother Baha'i Council was based in?
A. Roswell.
Q. Is that the community that Franklin Schlatter is associated with?
A. That's correct.
Q. How did you become a member of the group

recognizing Joel B. Marangella as a third guardian?
A. How detailed do you want to get?
Q. Just whatever to give the most accurate answer, that would be fine.
A. Most accurate answer. In 1966, after Mason had closed the court case and dissolved the NSA under the guardianship, after he had turned the affairs of the faith over to Joel Marangella, he began issuing articles that were not consistent with the basic Baha'i teachings. It was a very difficult period.
We had a person who we assumed was the guardian of the faith but was writing articles detrimental to the faith. We recognized this. It was a very difficult decision. After Mason Remey had dissolved the NSA, he wrote Jim and I in early '67 and asked if we would be his liaison between he and the believers.
It was with a great deal of regret that Jim and I turned him down. Mr. Mason -- Mr. Remey then requested a man named Charlie Murphy to assume that position. Mr. Murphy then became Mr. Remey's representative under the name of guardian of the Abha faith.
Q. So Mr. Remey you're saying had changed the name to Abha faith?

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A. He wanted to change the name. In his -- he had changed it.
Q. Okay.
A. For his own purposes. Okay.
Q. And you did not agree with that?
A. We did not agree with that.
Q. Okay.
A. So --
Q. Did you have to provide a declaration card or something of that nature to Mr. Marangella?
A. Well, let me go from '66 to '69. So '66 to '69 was essentially a void. Mr. Marangella made his proclamation in 1969. Upon reading it we realized that he indeed was the third guardian. And we declared our allegiance to him.
Q. Could a person be a member of Marangella's group if they didn't accept the hereditary guardianship principle?
A. Okay. Let me rephrase -- or let me hear that again.
Q. Sure. Could a person be a member of Mr. Marangella's group if that person did not accept the hereditary guardianship principle?
A. Could they be a member without accepting the hereditary guardianship principle of

Mr. Marangella's -- a member. I'm trying to think of an instance. Without being a member of the group or without the continue -- the adhering -- they could come fresh into the Marangella group without having endured what the rest of us did. But it would be necessary to accept the principle of the continuing guardianship.
Q. And, when you say again continuing guardianship, that's --
A. The hereditary.
Q. That's the same with hereditary?
A. Yeah.
Q. Okay. Was Joel Marangella the guardian of the Mother Baha'i Council group then as well?
A. The guardian of the Mother Baha'i Council. Inasmuch as they were members of -- general members of the faith, he was the guardian of the faith under his direction.
Q. Okay. Maybe another way to put it is the Mother Baha'i Council recognized him --
A. Yes.
Q. -- as a third guardian, correct?
A. Yes.
Q. And who was the first guardian?
A. Shoghi Effendi Rabbani.

Q. And who was the second guardian?
A. Charles Mason Remey.
Q. Was it Joel Marangella's decision to allow you to join his group?
A. His decision?
Q. Did he approve your membership, is that how that works?
A. I would say his -- his role was to acknowledge. He did not approve or disapprove or make any kind of decisions as to whether we had the right to be there or not. If we declared our fealty to him, he acknowledged it.
Q. I see. Was the -- have you heard of something called the National Bureau?
A. Yes.
Q. Was that a predecessor of the Mother Baha'i Council?
A. Not predecessor. It didn't take the same form. The National Bureau had no administrative duties. They were a coordinating teaching but no administrative duties.
Q. Did that entity recognize Joel B. Marangella as the third guardian?
A. Yes, it did.
Q. Did the people that were involved with the

National Bureau later become involved with the Mother Baha'i Council?
A. I'm reviewing the membership. As far as I know, it was only Mr. Schlatter.
Q. Okay. Does the third guardian, Joel B. Marangella, share his commentary upon writings such as the Will and Testament of Abdu'l Baha with members of the Orthodox Baha'i Faith?
A. Say that again, please.
Q. Does the third guardian, Joel B. Marangella, share his commentary upon writings such as the Will and Testament of Abdu'l Baha with members of the Orthodox Baha'i Faith?
A. Okay. The Will and Testament was not written by Joel Marangella.
Q. Right. It was written by Abdu'l Baha.
A. He's made commentaries on it. And the second part of the question?
Q. Are those commentaries for the benefit of the membership of the Orthodox Baha'i Faith?
A. For that and for teaching.
Q. Does the Provisional National Baha'i Council produce newsletters?
A. Yes, it does.
Q. Do you recall what titles?

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A. Star of the Covenant.
Q. Anything else?
A. Friends in Touch which is an in-house informal newsletter.
Q. And how would you characterize Star of the Covenant?
A. Star of the Covenant is the -- it's the official newsletter. And it is the method of documenting the guardian's communications with the friends and business from the PNBC to the friends. That would be his principal purpose. And for historical purposes.
Q. So is it distributed to all members of the -- what do you call, the Orthodox Baha'i Faith?
A. Yes, it is.
Q. Are you involved with the Star of the Covenant newsletter?
A. I began as editor of Star of the Covenant. I think the first issue I put out was November 2001 and I continue to the present day.
Q. Does anyone work with you on those newsletters?
A. In what manner?
Q. Just in compiling them, producing them.
A. I use materials submitted by the guardian and

I sometimes use material off the Internet. I use correspondence from the PNBC. And otherwise I am responsible, totally responsible for the content.
Q. Okay. Are you an officer of the Provisional National Baha'i Council?
A. I am the correspondence secretary.
Q. Okay. Have you held any other positions in leadership such as that with the Provisional National Baha'i Council?
A. No. A member of the council only.
Q. Okay. As secretary of the Provisional National Baha'i Council, do you have a vote on matters that come before that body?
A. Yes, I do.
Q. Do you, in fact, vote?
A. Yes, I do.
Q. Do you correspond with Joel B. Marangella in your capacity as secretary?
A. Yes, I do.
Q. Is that one of your main functions in the position?
A. One of the main functions? My main function as corresponding secretary is to respond to the directives of the PNBC in the matter of correspondence. Correspondence with Joel B.

Marangella is included in that.
Q. What do you correspond with him about?
A. There is some correspondence on a personal level. There is correspondence when he wishes me to share something with the friends on an immediate basis outside of the -- outside of the Star of the Covenant. There is correspondence that he directs to the council through me. There is correspondence when he wishes our help in, say, publishing a book. What else.
Q. Okay. Who else do you work with apart from Joel B. Marangella in your activities for the Provisional National Baha'i Council?
A. Who else do I work with? Okay. Say it again.
Q. Who else do you work with apart -- putting Joel B. Marangella aside, in your activities for the PNBC?
A. I work regularly with all the members of the PNBC. And I work with the general group, I forgot what we're calling them. The friends at large.
Q. Okay. Do you work with Frank Schlatter?
A. I do work with Frank Schlatter.
Q. Does Joel B. Marangella help direct the Provisional National Baha'i Council's activities?
A. Direct. He suggests and advises and

requests. I would not say that he directs.
Q. Do you generally follow those suggestions?
A. After consultation sometimes with the guardian himself, we come to an agreement and we do or we don't. I mean it's -- yes. I don't know how to answer that. It's not -- it's not a -- it's not a yes man situation.
Q. Do you have any examples of suggestions he's made that the Provisional National Baha'i Council has decided to reject?
A. Well, one instance comes to mind. And where he had asked us to send some money to an individual. And the council did not feel that that was appropriate. And we did not.
Q. Is that the only thing that comes to mind?
A. I beg your pardon?
Q. Is that the only thing that comes to mind?
A. Well, I'm trying to think. Well, as I said there were things where, although not rejected out of hand were worked out in consultation with the guardian. In other words, their original form did not end up as their final form. But it wasn't a rejection, it was consultation and working together.
Q. Thank you. Could you define the Provisional National Baha'i Council's goals?

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A. Goals. You want a mission statement, right? Okay. Its main goal, aside from being an administrative unit, is to and almost all of its efforts go to teaching the premise of the hereditary guardianship.
Q. Anything else?
A. Goal-wise. Well, I mean we could talk general terms. Serve the faith of Baha'u'llah. Its main goal is to be the coordinating factor in the faith and to support the teaching work.
Q. Now, is part of teaching the hereditary guardianship principle to teach that Mason Remey was the second guardian and then Joel B. Marangella is the third guardian?
A. That's true.
Q. Is that one of the goals as well?
A. One of the goals?
Q. To communicate that.
A. Yes.
Q. How many adult U.S. members are there in the Orthodox Baha'i Faith?
A. Jeff, is that confidential?
MR. GOLDBERG: You have to answer the questions.
THE WITNESS: I have to answer his question.

All right. Say it again.
BY MR. DOLAN:
Q. How many adult U.S. members are in the Orthodox Baha'i Faith?
A. Between 40, 45, that area.
Q. Does that number include persons that are serving on the Provisional National Baha'i Council?
A. Yes, it does.
Q. And you stated earlier that people serving on that council, there are nine; is that correct?
A. Nine, yes, nine.
(Exhibit No. 41 was marked.)
BY MR. DOLAN:
Q. The court reporter is handing you Exhibit No. 41. And this bears OBF 5413. Have you seen this list before?
A. Yes, I have seen this list before.
Q. And what is this?
A. It's the -- let me look it over here. It appears to be the current mailing list for the orthodox Baha'i.
Q. Can you take a look at this list, please. And would you be able to look through it and pick out the members that were in the earlier group under Mason Remey.

A. Okay.
MR. GOLDBERG: Excuse me. What exhibit number is this?
THE WITNESS: I have 41, whatever that means.
MR. GOLDBERG: Okay. Thank you, sorry.
THE WITNESS: On page 3 we have [redacted] we have --
BY MR. DOLAN:
Q. So, in looking at this, it looks like there's an asterisk placed there. I don't know if that was done by counsel. I think does that asterisk --
A. I don't know.
Q. -- designate --
A. I don't know what it does.
Q. Didn't you state earlier that [redacted] was a --
A. Oh, yes, I did pass up [redacted] on the front page. Sorry. Yes, [redacted] All right. [redacted]
Q. Do you see on --
A. All right. Now, where was I? Okay. Let me check closer here. Okay. We had [redacted] and then [redacted]
Q. I see that [redacted] are listed --

A. Yeah.
Q. -- as members, but they're in Western Australia?
A. Yes.
Q. But they were both under the Mason Remey group as well; is that correct?
A. Yes.
Q. Okay. On the next page, is it [redacted]
A. Oh, well, there's one on -- still one on page 3.
Q. Oh, thank you. Who is that?
A. Okay. That would be [redacted]
Q. Okay. [redacted]
A. No. He's the same age as my son so I think he would be too young. Okay. [redacted]
Q. Is that [redacted]
A. Yes, it is.
Q. And is [redacted] another relative of [redacted]
A. She was also a child so she wasn't under Mason Remey. [redacted] page 4.
Q. Okay.

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A. [redacted]
Q. I notice that [redacted] lives in Santa Fe. Is [redacted] or [redacted] relatives of someone that --
A. [redacted] is my daughter, [redacted] is my grandson.
Q. Got it.
A. And as is [redacted] my granddaughter. But they're youth -- they were youth at the time even -- they were kids -- I'm not even sure they were born. No, they weren't born until '78. [redacted] on the next page.
Q. He was a member in the original group?
A. He was from Mason -- from the Mason Remey group.
Q. I notice there's a [redacted] and a [redacted] Are they related to [redacted]?
A. They are ex-wife and son, but they were not under the Remey group.
Q. Okay.
A. They came in later.
Q. [redacted]?
A. [redacted] not under the Remey group.
Q. And what's her connection?
A. She's the daughter of [redacted]

Q. I see. Okay.
A. And on that page, of course, [redacted] Let's see. No. I believe that's all.
Q. Okay. On the second page, there's a person identified as [redacted]
A. Yes.
Q. Is she a relation of the [redacted] that you mentioned earlier?
A. No, she wasn't.
Q. She's not.
A. That was her married name. So she was not related.
Q. And, on the third page --
A. The third page.
Q. -- there are two other [redacted] listed there, [redacted]
A. Yes.
Q. One in Western Australia, the other one in Reston, Virginia?
A. Yes. I don't know the status of their -- in relation to Mason Remey.
Q. If you look through this list again from front to back, do you see any members with Illinois addresses?
A. [redacted] has an Illinois address.

Q. Okay. And then there's a [redacted] Carbondale.
A. [redacted]
Q. Does that say Carbondale, Illinois?
A. Yeah, Carbondale.
Q. On the next page, you see a [redacted]
A. [redacted]
Q. Barrington, Illinois?
A. Yes.
Q. Do you see any others? Oh, actually [redacted] is listed as Champaign, Illinois; is that correct?
A. Yeah, I guess it is, yeah. I'm not quite familiar with where she is. Her address says Champaign so I presume she's there.
Q. Okay. If you know, is the number of U.S. members higher now than it was under the Mother Baha'i Council, for example, in 1996?
A. I'm trying to remember. Okay. Mother Baha'i Council was '78 to 2000. I'm not sure I can answer that because I don't have accessibility to the mailing list from the Mother Baha'i Council. So I don't think I can actually answer that.
Q. Okay. Thank you. Would this be a good time for a break? Are you okay to continue?

A. I'm fine.
Q. Okay. Let me ask you a few questions then. Do you recognize the name [redacted]
A. Yes, I do.
Q. Was she in the Orthodox Baha'i Faith in the U.S. under Joel B. Marangella?
A. Yes.
Q. Was [redacted] also in the Orthodox Baha'i Faith under Joel B. Marangella?
A. Yes.
Q. Was [redacted]
A. [redacted] was struck with Alzheimer's and I don't remember when. She was a supporter of Mason Remey. I don't know if she was -- if she made it to be a supporter of Joel Marangella or not.
Q. Do you recognize the name [redacted]
A. [redacted] yes.
Q. Do you know if she was a follower of Joel B. Marangella in the U.S.?
A. Most of these people are deceased. And I'm trying to remember if they died before or after. She was definitely a follower of Mason Remey. Without looking at the membership lists again, I cannot tell if you she made it to Joel.
Q. Okay. Same question for [redacted]

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A. [redacted] again is deceased. I know she supported Mason Remey. She was elderly. Again, without checking the membership lists, I'm not sure.
Q. Okay. Do you know the name, I'll probably miss the pronunciation, but [redacted]
A. [redacted]
Q. [redacted]
A. [redacted] yes, I do.
Q. And was he a person that had -- in the U.S. that had pledged to Joel B. Marangella?
A. I believe so.
Q. Was [redacted] someone who accepted Joel B. Marangella as third guardian?
A. Yes, he was.
Q. How about [redacted]
A. Yes, she was.
Q. Another tough name, [redacted]
A. [redacted] She was a devouted follower of Mason Remey. Again, without the membership lists, I don't know if she was or not.
Q. You mentioned [redacted] earlier.
A. Yes.
Q. Was [redacted] someone who identified Joel B. Marangella as a third guardian?
A. Yes.

Q. And you also identified [redacted] earlier?
A. Yes.
Q. What of [redacted] and [redacted]
A. [redacted] parents, yes, they did, accepted both Mason Remey and Joel Marangella.
Q. [redacted]
A. [redacted]
Q. [redacted]
A. [redacted] was the way -- [redacted] yes.
Q. Was -- did he also accept Joel B Marangella as third guardian?
A. Yes, he did.
Q. And [redacted]
A. [redacted] did.
Q. Is [redacted] related to Frank Schlatter?
A. [redacted]
Q. And you already mentioned that [redacted] [redacted] did?
A. Has accept -- yes.
Q. Husband and wife, yeah. And they accepted Joel B. Marangella?
A. Yeah.
Q. [redacted]
A. [redacted] Yes -- well, wait a minute.

Okay. [redacted] accepted Mason -- I know she accepted Mason and I know that she gave her artifacts and things to the storage. Again, without the mailing list, I'm not sure, but I think.
Q. You think she did?
A. I think she was, yeah.
Q. Do you know the name [redacted]
A. [redacted] yes.
Q. Was she someone who also accepted Joel B. Marangella as the third guardian?
A. [redacted] she accepted Mason. I don't know if she accepted Joel or not.
Q. All right. [redacted]?
A. [redacted]
Q. Is [redacted] someone who accepted Joel B. Marangella as a third guardian?
A. He did.
Q. And that was a person who was in the earlier Mason Remey --
A. Yes.
Q. -- group in the sixties?
A. Yeah. Now deceased.
Q. [redacted]
A. [redacted]
Q. [redacted]

A. Yes.
Q. Was that a person who accepted Joel B. Marangella as a third guardian --
A. Yes.
Q. -- in the U.S. And was that a man or a woman?
A. It was a lady.
Q. Oh. Was she in the Mason Remey group earlier as well?
A. She was in the Mason Remey group.
MR. DOLAN: Okay. Could we go off the record for a moment, please.
THE VIDEOGRAPHER: We are off the record. The time now is 10:26 a.m.
(Recess.)
THE VIDEOGRAPHER: We are back on the record. The time now is 10:38 a.m.
BY MR. DOLAN:
Q. Ms. Meyer, are you familiar with the title Hand of the Cause as it relates to your group?
A. Yes, I am.
Q. What is a Hand of the Cause?
A. A Hand of the Cause is a person appointed by the living guardian. Their purpose is to serve and protect the guardian and the faith.

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Q. You referred to a living guardian. Is that a particular individual?
A. A Hand of the Cause can only be appointed by a living person. They can only be appointed by the guardian. So, therefore, the guardian has to be living.
Q. And who is the living guardian?
A. I beg your pardon?
Q. Who is the living guardian?
A. The living guardian is Joel B. Marangella.
Q. Are you a Hand of the Cause?
A. I am.
Q. Were you appointed to that role by Joel B. Marangella?
A. I was.
Q. Who else is a Hand of the Cause in your group?
A. Frank is a Hand of the Cause, Frank Schlatter.
Q. Thank you.
A. Dave Maxwell is a Hand of the Cause. Jeff Goldberg is a Hand of the Cause. Ross Campbell is a Hand of the Cause. Y.H. Taylor is a Hand of the Cause. Ross Campbell is a Hand of the Cause.
Q. Is that everyone you can think of?

A. Is that seven? I think there are seven.
Q. There are seven. Okay.
MR. GOLDBERG: That was only five.
THE WITNESS: Okay. Oh, Nosrat Bahremand, N-o-s-r-a-t B-a-h-r-e-m-a-n-d. Is that it, is that seven?
MR. GOLDBERG: No, that's six.
THE WITNESS: Well, myself, did you get myself down.
MR. GOLDBERG: Oh, yeah. I'm sorry.
THE WITNESS: Okay.
BY MR. DOLAN:
Q. So we've got seven?
A. Yeah, seven.
Q. Okay. What more specific roles and duties does a Hand of the Cause perform?
A. The Hands of the Cause perform -- I won't use perform, implement directives from the guardian. They consult at the guardian's request on problems, they are assigned individual tasks by the guardian. They are not a consultative body per se.
Q. You mentioned earlier that you receive correspondence from Joel B. Marangella in your role as secretary; is that correct?
A. (Witness nods head.)

Q. And you, if appropriate, have it published in the newsletter?
A. Yes.
Q. You've been doing so since November of 2001; is that correct? Could you repeat the answer. You've been doing that since November of 2000; is that correct?
A. Oh, I'm sorry. I thought I said yes. Editor of the Star of the Covenant since November 2001.
Q. Okay. Does your group have a national archives?
A. We have a storage unit for historical material. It's not archived as one thinks of archives.
Q. Has Joel B. Marangella referred to that as the national archives?
A. He has.
Q. And where is the storage container?
A. The storage is on the Meyer property at No. 6 Meyers Road, Espanola, New Mexico.
Q. Is that the sea crate that I visited last month?
A. That is the Seatainer, yes.
Q. What types of things are in that container?
A. Okay. The container, it has -- how should I

say this. It has records to -- records and documents placed there by various individuals. It has minutes, it has -- it's -- it has our publications. It has copies of our newsletters.
It has -- it has documents relating to the affairs of the faith from -- we have record -- we have -- for instance, we have newsletters there from 1922 which was much prior to our organization. So it's a -- historical documents I guess you would call them.
Q. Are there original documents in the container relating to the Remey NSA and the group under Mason Remey from the 1960s?
A. Yes, there are.
Q. And the newsletters you referred to, do those include Glad Tidings in those documents?
A. Yes. Well, I guess. I mean I couldn't find a complete set. So yes, but there are some there.
(Exhibit No. 42 was marked.)
BY MR. DOLAN:
Q. The court reporter is handing you an exhibit that's been marked 42. And it bears OBF 2579. Do you recognize this document?
A. Yes, I do.
Q. What is it?

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A. Well, let me see what it is. I believe it's a Ridvan letter.
Q. What does that mean?
A. Ridvan is -- well, the word Ridvan comes from the place where Baha'u'llah announced his station as the manifestation of God. Ridvan takes place from April 21st to May 2nd yearly. It has been the guardian's -- Joel Marangella's habit to share a compilation with the believers at Ridvan every year.
Q. So this is a letter from Joel B. Marangella?
A. This is a letter from Joel B. Marangella, yes.
Q. To the people that identify him as third guardian?
A. Yes.
Q. This doesn't have a header or anything of that nature. Is this something that you distribute as the secretary, does it come to you?
A. Yes, it does.
Q. Okay. If you look through this, does it appear to be an accurate copy of the letter that Mr. Marangella would have sent to you?
A. Yes, it does.
Q. Could you turn to the second page, please.
A. Page 2.

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Q. Do you see, in the fourth paragraph, starting of particular note?
A. Okay.
Q. Could you read that, that first sentence.
A. You want me to read it?
Q. If you could.
A. "Of particular note during the past year has been the significant activity of the faithful friends on the Internet in their magnificent and deeply appreciated response to my request to increase their participation in posting to the Baha'i news groups and other forums."
Q. If you'd turn a couple pages in, please. In the fourth paragraph, it reads "Recently a list of 95 heterodox Baha'i groups listed by the Microsoft network with their respective Internet addresses shown, has been brought to my attention by Joel which I have in turn transmitted to the National Council in the United States." Do you see that?
A. Yes, I do.
Q. What's meant by heterodox?
A. We call ourselves orthodox. The word orthodox means clinging to the original teachings. We among ourselves usually refer to heterodox as those who have breached the teachings, the principal

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teachings. And they would be identified as, in the United States, the NSA and Wilmette; and the Universal House of Justice in Israel.
Q. So that word would refer to my client and the counterclaimant in the underlying suit?
A. Yes.
Q. And he says Joel. Is that Joel J. Marangella?
A. That would be Joel J. Marangella.
Q. And it doesn't say Provisional National Council in the United States, but is that what is intended there?
A. Yes, that's intended.
Q. Okay. A little bit further down in that paragraph, if you look eight lines down.
A. Eight lines down.
Q. There's a phrase that I'll just read in for you.
A. Okay.
Q. It says "They may find it desirable to coin a pseudonym in making such postings to make sure that they are initially read, for it is likely that as soon as the recipients identify the authorship the postings, they may bar them from making future postings." Do you see that?

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A. I see that.
Q. Then later in this letter, the second to last page, it notes that you have been announced --
A. Appointed.
Q. Appointed as a Hand of the Cause?
A. Yes.
Q. Is that -- is that the approximate date when you --
A. That is the date.
Q. Okay. It was as of this letter?
A. As of this letter.
Q. Thank you.
(Exhibit No. 43 was marked.)
BY MR. DOLAN:
Q. The court reporter is now handing you -- here it is. Exhibit 43, it's OBF 2586. Is this also a letter from Joel B. Marangella?
A. This would be from Joel B. Marangella.
Q. And what year is this one?
A. Ridvan 2005.
Q. If you could look through it, does that look like an accurate representation of the letter that he had sent to you?
A. As far as I can tell.
Q. If you can turn in three pages to 2588.

A. Three pages.
Q. There's a second bulleted paragraph there referring to Joel B. Marangella's son, Mark. Do you see that?
A. Yes.
Q. It says that he was contacting "Baha'i clubs in universities throughout the United States."
A. Yes.
Q. To provide them with the Baha'i Scholars Series. Do you know if any of those universities that he contacted were in Illinois?
A. I do not, I do not.
Q. And do you see, in the third sentence of that paragraph, I'll read it, it says "The first few articles in the series included extensive excerpts from the writings of Shoghi Effendi in the Baha'i Administrative Order. And it was only during the end of the series that he transmitted articles that revealed the fact that he was attempting to bring them the truth about the continuance of the guardianship."
A. I see the sentence.
Q. Do you see that?
A. Yes.
Q. Why would he save that to the end, if you know?

A. What was the question, why would who say what?
Q. Why does he point out that only during the end of the series would he reveal the fact that his articles are about the continuance of the guardianship?
A. I actually have no knowledge of that.
Q. Okay.
A. I -- I can't comment on that, it's out of my -- yeah, understanding. I don't know.
Q. It also mentions just after there a second project of Mark Marangella's relating to The World Order of Baha'u'llah Continues to Unfold?
A. Yes.
Q. Is that a book?
A. It is a book.
Q. Okay. And it states that he is attempting to distribute that book to libraries throughout the United States. Do you see that?
A. Yes.
Q. Do you know, did that occur?
A. It was placed in the hands of the council. And we have made attempts, some of them successful, some not.
Q. Did you attempt to do so in Illinois,

libraries in Illinois?
A. I wasn't on the committee so I can't answer that.
Q. You don't know if any books were placed in libraries in Illinois?
A. I don't know.
Q. Okay. Are you aware of any other works titled World Order?
A. Shoghi Effendi wrote the first book called World -- wait a minute. World Order -- World Order of Baha'u'llah, yeah.
Q. Okay.
A. Yeah, right.
MR. DOLAN: Could we mark this as maybe A of whatever we are on now.
(Exhibit No. 43 A was marked.)
BY MR. DOLAN:
Q. Does that look like the title you were thinking of?
A. That is the title -- wait a minute. I am not familiar with this. I don't believe that the words Selected Letters were on it. I don't -- this is -- this is not --
MR. GOLDBERG: Can I take a look at that.
THE WITNESS: I don't believe the title

Selected Letters were on the first copy.
BY MR. DOLAN:
Q. It was just World Order of Baha'u'llah?
A. World Order of Baha'u'llah. And this, of course, is a recent publication. So I'm not familiar with it.
Q. Okay.
A. It's tabbed. Okay.
Q. No, no.
A. Oh, okay.
Q. Here you are.
A. You want it back.
Q. Yeah, I'll show you what --
A. Okay. Okay.
Q. Do you see, on the second page, front and back, there is an attribution there, can you read that down at the bottom of the page.
A. Here?
Q. Uh-huh.
A. Baha'i Publishing Trust, Wilmette, Illinois.
Q. And the flip side of that page, if you -- if you turn the page.
A. Oh, turn the page.
Q. Thank you. Do you see a copyright notice there?

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A. I do see copyright notices.
Q. And does it state who the copyright belongs to?
A. National Spiritual Assembly of the Baha'is of the United States.
MR. DOLAN: Okay. Now, if we could mark this one as B.
(Exhibit No. 43 B was marked.)
THE WITNESS: Through with this? You want this back?
BY MR. DOLAN:
Q. Sure. Thank you.
A. Okay.
Q. Is that the book that you mentioned earlier?
A. Yes, it is.
Q. And what's the title?
A. The World Order of Baha'u'llah Continues to Unfold.
Q. And who is the author?
A. By Joel B. Marangella.
Q. Is there any publication information on the inside?
A. Publication. Wait a minute. Okay. It says "Copyright pending by the Baha'i Scholars Publishing Trust in association with the National Baha'i Council

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of the Orthodox Baha'is of the United States."
Q. Is that the Provisional National Baha'i Council?
A. Yes.
Q. Okay. Have you heard of any other publications titled World Order relating to the Baha'i faith?
A. No. But I would like to correct my former -- the original book was called World Order Unfolds. Okay. Not just World Order, World Order Unfolds. And then Joel's is World Order of Baha'u'llah Continues to Unfold.
Q. Okay.
A. And what was your question?
Q. My question is have you heard of any other publications related to the Baha'i faith titled World Order?
A. There were way, way back, something called the World Order Magazine. That was --
Q. Do you know if that magazine continues to be published?
A. I do not. I don't think it is. But I -- not being a member of that group, I don't know. I know it was a magazine published in the thirties.
Q. Are you aware that National Spiritual

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Assembly of the Baha'is of the United States holds a trademark registration for World Order as it relates to magazines?
A. I was not aware of that.
Q. If you could turn to the first page of that letter, please.
A. The Ridvan 2005?
Q. That's correct.
A. Okay.
Q. This statement at the bottom sentence -- at the bottom of the page, I'm sorry, it states "furthermore, you were seriously handicapped prior to the" --
A. Wait a minute, wait a minute.
Q. Sure.
A. Okay. What's the sentence begin with?
Q. Furthermore. It's the last sentence on the page.
A. Oh, furthermore, the last sentence. Okay.
Q. It states "Furthermore, you were seriously handicapped, prior to availability of the Internet, in making contact with these misled believers and revealing to them the facts proving the continuation of the guardianship and had to rely solely on the placement of articles in newspapers." And then it

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goes on to say that placement of articles in newspapers was very costly and produced little results. Do you see that?
A. Yes, I do.
Q. What does it -- what's the misled believers refer to?
A. The misled believers -- neither guardian has ever referred to the body at large, the members at large, under the direction of the NSA of U.S.A. Wilmette or the Universal House of Justice as anything but misled believers. They have never been condemned, they have never been named as covenant breakers, they have always been referred to as misled believers.
Q. Okay. So does that refer to --
A. That refers to --
Q. -- my client and --
A. Yes, it does.
Q. Okay.
A. Well, does it refer to your client. I believe it does.
Q. Okay. Could you turn to 2589, please. Do you see the first bullet point at the top of the page?
A. Yes.
Q. It states that -- it elaborates on the attempt to email people with the email addresses that

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we discussed in the 2004 letter a moment ago. Do you see that?
A. Yes, I do.
Q. Okay. And it says that a problem was encountered because the web sites required proof of being a registered Baha'i. And it describes them as under the heterodox Baha'i administration before postings could be made.
A. Okay.
Q. So that again refers to my client?
A. Your client.
Q. Okay. If you could please turn to the next page. Do you see at the top, it describes a play that I believe Mr. Goldberg worked on.
A. What page are we on?
Q. It starts on the bottom of 2589. Sorry.
A. Oh, 2589. Okay. Yes.
Q. Do you see that? It says, on the next page, that it's hoped that the play -- the publication of this play will eventually attract out of curiosity, if for no other reason, members of the heterodox Baha'i community. Do you see that?
A. Yes.
Q. Was that the intent behind writing that play, do you know?

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A. I don't think I can know the intent behind writing that play.
Q. If you could look to the last page, please.
A. All right.
Q. Do you see where Mr. Marangella states that his guardianship has endured for 40 years, it's on the third and fourth line of the last page?
A. Are we the last page?
Q. Correct.
A. Ninety-two.
Q. That's right.
A. Okay. All right. Yes, I do see that.
Q. So as of 2005 he had been guardian for 40 years?
A. Yes.
Q. Okay.
A. That's it for this one?
Q. It is.
(Exhibit No. 44 was marked.)
BY MR. DOLAN:
Q. The court reporter is now handing you Exhibit 44. And it bears Bates No. OBF 3067. What is this document?
A. This is -- as I said before, it's a more informal document reporting the activities, comments,

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contributions of the friends at large. It does not report things like letters from the guardian and so on. It's an unofficial letter of contact between the friends.
Q. And this one is dated February 2002?
A. Yes, it is.
Q. Who was in charge of putting this together or gathering the materials?
A. Jean Olsen.
Q. Okay. And it states here it's a publication of the Orthodox Baha'i Faith; is that correct?
A. That's correct.
Q. Okay. If you look through this, does this look to be a true and accurate copy of Friends in Touch from 2002?
A. I would say it is.
Q. Okay. Do you see a 3071, there's a heading For Your Information?
A. Okay.
Q. And there are some statements there attributed to Jeffrey Goldberg. Would you take a look. Do you recall him making those statements, the quotes just below the asterisk? It reads that truebahai.com is "a place of links to orthodox Baha'i sites. It serves as a single web address for all OBF

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sites. Also one of its functions will be to enhance its rankings on search engines."
And it goes on to say "The Internet is key to the recent and continuing growth of the OBF. It is time for us to make a systematic and concerted effort to expand the number of sites we have, the content available, and the amount of traffic coming to our sites."
A. And what was your question?
Q. Do you remember Jeffrey making those statements?
A. Only as they're reported here. Otherwise I have no knowledge.
Q. And the person who put this letter together would have gathered these comments from messages or personal discussions?
A. Various sources, letters, Internet, yeah.
Q. Okay.
A. Oh, I have to correct myself.
Q. Okay.
A. Okay. No, I don't. I saw this thing called circles submitted by KJ. But it was still -- Jean Olsen was still publishing this.
Q. Okay. Thank you.
A. I thought I misspoke there for a moment.

(Exhibit No. 45 was marked.)
BY MR. DOLAN:
Q. The court reporter is now handing you Exhibit 45. It bears OBF 3075. What is this document?
A. This is an issue of the Star of the Covenant, Newsletter of the Orthodox Baha'i Faith Published by the Mother Baha'i Council of the United States.
Q. Does it look to be a true and accurate copy of the Star of the Covenant newsletter?
A. I couldn't say that because I didn't publish it. I could look through -- I don't think I did. April 2000. Yes, I did. Wait a minute here. Yes, I did. Oh, I -- all right. I know what the question is here. We were using up old mastheads.
Q. Just so I know, what question are you answering?
A. I don't know. But I was confused because yes, I did put this out. But the masthead says the Mother Baha'i Council. I wanted to correct --
Q. Oh, I see. Okay.
A. Anyway we were using up old mastheads. So yes, I did push this out.
Q. Okay. So you're just pointing that it reads Orthodox Baha'i Faith?
A. Yes.

Q. Star of the Covenant. Then says it's by Orthodox Baha'i Faith. Yeah, okay.
A. Okay. But yes, this was an effort of mine. Therefore, I can identify it.
Q. And then if you could turn to page 3086, please.
A. Page 3086, all right.
Q. Jeffrey is already there.
MR. GOLDBERG: I'm head of you.
BY MR. DOLAN:
Q. There's a page described as Web Site Teaching by Jeffrey Goldberg. Do you see that?
A. Yes, I do.
Q. And it gives some thoughts on effective use of the Internet to teach.
A. Uh-huh.
Q. And do you see the top there, it states "Almost all of the recent enrollments in the OBF have come from initial contact on the Internet"?
A. I see that sentence.
Q. Okay. And then it says that "We can improve results by making a sustained systemic effort to expand and broaden our web presence and to drive Internet traffic to our sites."
A. I see that sentence.

Q. Was this teaching about web site use something that just occurred through this newsletter or were there classes held in connection with this or anything of that nature?
A. We have had some hands-on efforts at teaching in our conferences, yes.
Q. With respect to teaching people to use the Internet to reach --
A. Yes. Well, yes, yes. Well, teaching them to use the Internet, period, yes.
Q. Okay. Do you see, at the bottom of the page, it says -- it gives a links page. And it's www.truebahai.com?
A. Yes, I see that.
Q. If you could turn to -- actually let's go to the next exhibit.
A. Oh, next exhibit.
Q. Please.
(Exhibit No. 46 was marked.)
BY MR. DOLAN:
Q. This is Exhibit 46 and it's OBF 38. What is this document?
A. This is Friends in Touch, a Publication of the Orthodox Baha'i Faith, May 2002.
Q. Thank you. If you could turn to 3093,

please.
A. All right.
Q. Do you see, at the bottom of the page, there's an attribution of teaching goals to someone named Martin Lavallee?
A. Lavallee.
Q. Lavallee.
A. Ninety-three. Oh, yes, okay.
Q. And it states that, as an additional suggestion, people should "Target cultural minorities in your region. Contact a fresh convert from the heterodox Baha'is." What does that mean, contact a fresh convert from the heterodox Baha'is?
A. I have no idea.
Q. What would you think it would mean?
A. Contact a French -- a fresh convert from the heterodox Baha'is. "Target cultural minorities." Mr. -- as a word of explanation, Mr. Lavallee is French. And I'm presuming that, when he says cultural minorities, he's thinking of people who do not necessarily speak English. "Contact a fresh convert from the orthodox Baha'is." I can't explain his comment.
Q. Okay. Do you see the last sentence, it says "Always get the phone number of the contact,

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1 follow-up, and recruit." Is that what that says?
2 A. That says that. I -- that's his statement,
3 not mine.
4 Q. Who is this newsletter distributed to?
5 A. This is distributed to -- strictly to members
6 of the Orthodox Baha'i Faith. It's an in-house or --
7 I think. Let me see. As far as I know.
8 Q. So anyone who is a member of the Orthodox
9 Baha'i Faith would receive --
10 A. I think so. Again this is not my mailing.
11 So I'm not --
12 (Exhibit No. 47 was marked.)
13 BY MR. DOLAN:
14 Q. Okay. Now, here I've got Exhibit 47, it's
15 OBF 3974.
16 A. Yes.
17 Q. Again what is this document?
18 A. This is an October 2002 issue of the Star of
19 the Covenant.
20 Q. This was one that you handled, correct?
21 A. Yes, it was -- yes, I was the editor on this.
22 Q. Okay. And the third page in, there's a news
23 item on Internet Activity. Do you see that?
24 A. Third page in. One, two, three.
25 Q. It's 3976.

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1 A. Oh, 3976.
2 Q. Right.
3 A. Okay. I missed a page here. Okay. 3976.
4 Yes, I do see that.
5 Q. Okay. If you look at the second paragraph.
6 A. Right.
7 Q. It announces Jeffrey Goldberg's announcement
8 of the publication of a new web site titled Orthodox
9 Baha'i Faith, Frequently Asked Questions, and it's
10 located as truebahai.com. Do you see that?
11 A. I see that.
12 Q. And Jeffrey gives an explanation saying that
13 "There are many heterodox Baha'is on the Internet
14 constantly searching for Baha'i related materials. If
15 we can get more and more web sites operating, we can
16 increase the number of heterodox believers who
17 'stumble' upon our web sites. If you have any
18 questions and answers that you wish to submit, please
19 send them to me." Was this communicated to you
20 through a letter or did you discuss this with Jeffrey
21 before you put it in the newsletter?
22 A. Let me see. I don't truly know. As I say I
23 pulled some of the material from this off the web
24 site, some of it I -- what's the word when you -- all
25 right. Wait a minute. I don't believe that this was

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1 in the form of a letter. I think I formulated this
2 self -- this from information that came to me I don't
3 know how.
4 Q. Okay.
5 THE VIDEOGRAPHER: Excuse the interruption.
6 We have about one minute of tape left.
7 MR. DOLAN: Okay. Well, let's go off the
8 record then. Thank you.
9 THE VIDEOGRAPHER: This ends tape No. 1 in
10 today's videotaped deposition of Marilyn Meyer. The
11 time now is 11:15 a.m. We are off the record.
12 (Discussion off the record.)
13 THE VIDEOGRAPHER: This begins tape No. 2 in
14 today's videotaped deposition of Marilyn Meyer. The
15 time now is 11:17 a.m. We are back on the record.
16 (Exhibit No. 48 was marked.)
17 BY MR. DOLAN:
18 Q. Ms. Meyer, the court reporter is now handing
19 you exhibit --
20 A. Are we through with this?
21 Q. We are. Thank you. Exhibit No. 48. It's
22 OBF 3224. And what is this document?
23 A. This is an issue of the Friends in Touch
24 published by the Orthodox Baha'i Faith. The issue is
25 May 2003.

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1 Q. Do you see, on the second page, in the fourth
2 paragraph, there is a line -- there is a discussion
3 about an Illinois regional conference.
4 A. Yes, I see that.
5 Q. What is that about?
6 A. A regional conference is that which is held
7 between major conferences. It's a place or a time for
8 the friends in a certain area to come together not
9 only to consult with fellowship but to forward
10 suggestions to the PNBC for topics to the main
11 conferences.
12 Q. And this newsletter is from May 2003?
13 A. Yeah.
14 Q. So when was it that that Illinois regional
15 conference would have occurred?
16 A. If there wasn't a date on it, it would have
17 been shortly before the issue was published.
18 Q. Okay. Do you see, on the next page, 3226?
19 A. Yes, I see.
20 Q. It states that "The Guardian wants more
21 articles translated and made available on the web"?
22 A. Yes.
23 Q. That's referring to Joel B. Marangella?
24 A. The guardian being Joel B. Marangella, yes.
25 Q. And on 3227 there is further discussion about

the Illinois conference and it indicates that it was attended by Robert and Jo Clifton and Summer Rhodes?
A. Yes.
Q. And that Janice Franco of Barrington --
A. As far as I understand, yes.
Q. -- attended by phone; is that right?
A. Uh-huh.
Q. And, on the next page, there's a picture --
A. Did you say -- okay. Janice Franco was unable to attend.
Q. It says that she gave input by email and by telephone; is that right?
A. Okay. That's the report.
Q. Okay. And then, on the next page, there's a picture of Illinois orthodox Baha'i convention as it's titled.
A. Okay.
Q. Dated April 6, 2003.
A. I see it.
Q. That's Summer Rhodes and Jo Clifton and Robert Clifton pictured there?
A. Yes, it is.
(Exhibit No. 49 was marked.)
BY MR. DOLAN:
Q. The next exhibit that I'm handing you is

Exhibit 49. And it's OBF 3351. Do you know what this document is?
A. Yes, it's an announcement of the -- let me see. Is it an announcement or a report? Wait a minute. It's an announcement of the agenda for a conference.
Q. This is the autumn conference of 2003; is that correct?
A. That's correct.
Q. And it states that "The orthodox Baha'i conference will be held on October 18 and 19, 2003, in Albuquerque, New Mexico."
A. That's correct.
Q. Do you see the tentative agenda below there?
A. Yes.
Q. It states that "It is hoped that part of the Saturday afternoon session can be devoted to 'computer lessons' so that we may all try to comply with the guardian's directive to post to the news groups rather than just a few doing so."
A. I see that.
Q. Do you remember, was that actually done during the autumn conference?
A. I believe it was. And that's one of the things I referred to earlier as trying to figure out

how to work the Internet.
Q. Did you write this?
A. I did.
(Exhibit No. 50 was marked.)
BY MR. DOLAN:
Q. The next exhibit that we're handing you is Exhibit 50. It's OBF 3300. What is this document?
A. This is an issue of the Star of the Covenant, the newsletter of the Orthodox Baha'i Faith -- I forget the -- under the -- under the auspices of the PNBC.
Q. Okay. And is it dated January 2000 --
A. And it's January 2004.
Q. Thank you. And does this -- if you could look through it, does this look to be a true and accurate edition of the Star of the Covenant?
A. It looks as if it's correct.
Q. Thank you.
(Exhibit No. 51 was marked.)
BY MR. DOLAN:
Q. The next exhibit I'll hand you is Exhibit 51. And it bears OBF 3353. Is this a Friends in Touch newsletter dated February 2004?
A. Yes, it is.
Q. If you could turn to 3358, please.

A. Yes.
Q. The third to last paragraph, if you see that on the page, it's a summary of some comments from Jeffrey Goldberg to the community.
A. From Jeffrey Goldberg, yes.
Q. And therein he quotes Joel B. Marangella starting at the quotation mark our newly declared. Do you see that paragraph?
A. I see that.
Q. Could you read through that and tell me if you visually recall Mr. Marangella making that statement.
A. You want me to read it aloud or quiet, I mean just to myself?
Q. Actually I'm looking at it and it appears that it's Jeffrey's quotation?
A. Yes, I -- I was going to say, I can't really since it was -- it was evidently written to Jeffrey.
Q. It states --
A. So I can't authenticate that.
Q. And this was in a Friends newsletter --
A. Yes.
Q. -- that you didn't work on this newsletter either; is that right?
A. That's correct, that's correct.

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Q. If you look through it, does it look to you to be a true and accurate copy of the newsletter?
A. To the best of my knowledge.
(Exhibit No. 52 was marked.)
BY MR. DOLAN:
Q. The next document that I'll hand you is Exhibit 52. And it's identified as OBF 3389. What is this document?
A. This is an issue of April 2004 Star of the Covenant published by the Orthodox Baha'i Faith.
Q. Does that look to be a true and accurate Star of the Covenant?
A. To the best of my knowledge, yes.
Q. And this was during your --
A. Yes, I was editor, yes.
(Exhibit No. 53 was marked.)
BY MR. DOLAN:
Q. The next document I'll hand you is Exhibit 53. And it's identified as OBF 5767. What is this document?
A. Well, I have to look it over first.
Q. Take your time.
A. All right. It is a set of minutes for the meeting of May 2nd, 2004. Jeffrey is the recording secretary so he formulated the minutes.

Q. Okay. So that's -- the covering email is from Jeffrey?
A. Yes.
Q. But the email address reads contact - truebahai?
A. That's correct.
Q. And you received a copy of this?
A. I did.
Q. If you could turn in to the actual minutes, the second page of the exhibit, please. It says that, at this meeting of May 2nd, 2004, there's a list of people present?
A. Which page, please?
Q. On the 5768 page.
A. Five what?
Q. 5768.
A. Six eight. Okay.
Q. This reads "Minutes of Meeting Held May 2, 2004, in Vaughn, New Mexico." Do you see that at the top?
A. Yes, all right.
Q. And could you read into the record who was present?
A. [redacted]

[redacted]
Q. Does it say as a guest there?
A. It does not say that on there.
Q. Does he frequently attend these meetings?
A. Yes, he does.
Q. If you could turn to 5769, please. Are you there?
A. Yes. I'm sorry. Yes.
Q. Do you see item 3, it says dispensation printing?
A. Item 3, yes.
Q. What's that referring to?
A. We issued -- we -- let me see, how should I say that. There was a -- we -- we republished in a different form and a different format the writings of Shoghi Effendi in which he -- the name of his book was the Dispensation of Baha'u'llah. And that refers to that.
Q. What do you mean by you republished it?
A. We did -- we reissued. Now, how -- I don't know how to say this. We reformatted it, reworked, and had it published again with additions I believe.
(Exhibit No. 53 A was marked.)

THE WITNESS: Are we through with this?
BY MR. DOLAN:
Q. Not yet. But we're handing you Exhibit 53 A. Is that the republication that you're referring to?
A. Yes, it is.
Q. Was -- did you print this at Joel Marangella's direction?
A. I believe it was his suggestion that we do it. We had tried to obtain copies of this from various publish -- we had tried to obtain copies of the Shoghi Effendi publication from various sources. Whether it's out of print or not I don't know. And it was his suggestion that we print this.
Q. Do you know, did he pay for the printing of it?
A. No, he did not.
Q. Who did?
A. The council paid for the printing.
Q. Do you know how many copies were made.
A. Oh, we usually ran with, I don't know, I can't say. But it was over -- over 100.
Q. And have those been distributed?
A. They have been distributed to the members of the Orthodox Baha'i Faith. They have been distributed to inquirers.

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Q. Within the United States?
A. Yes, yes.
Q. Okay.
A. I guess you would say that, yeah. All right.
Q. Okay. I'm going to hand you again an exhibit that you saw before, it's 43 A.
A. Do you want this back?
Q. You can hold onto it for now, please.
A. Okay.
Q. It's 43 A. If you could turn to the tabbed page, please.
A. All righty.
Q. Do you see a work there by Shoghi Effendi?
A. Yes, I do.
Q. What's the title?
A. The Dispensation of Baha'u'llah.
Q. And that's the same title as the pamphlet that --
A. Yes. We added the words "The Spiritual Testament of the First Guardian."
Q. You just added that to the title yourselves?
A. We added that to the title we published.
Q. It didn't exist in the original?
A. It didn't exist before.
Q. If you could please turn back to the minutes

document.
A. Okay.
Q. Do you see on 5770 --
A. Yes.
Q. -- under No. 6 it states "Motion passed"?
A. Yes, I see it.
Q. And it reads "Jeffrey and Chad." Does that refer to Jeffrey Goldberg?
A. Goldberg and Chad Olsen.
Q. "Are appointed to an Internet teaching committee." And it goes on to state that "The purpose of the ITC" -- which refers back to the Internet teaching committee -- "is to coordinate the teaching efforts on the Internet to recruit, encourage, assist," et cetera. Do you see that?
A. Yes.
Q. And this is -- that was actually in the minutes of May 2nd, 2004, correct?
A. Right, yes.
(Exhibit No. 54 was marked.)
BY MR. DOLAN:
Q. I'm going to hand you now Exhibit No. 54. It's OBF 3542. And what is this document?
A. This is a May 2005 issue of the Friends in Touch published by the Orthodox Baha'i Faith.

Q. Okay. Could you look through it and see if it looks to be an accurate and complete copy of the newsletter.
A. It looks to be correct.
Q. And is it dated May 2005?
A. Yes, May 2005.
Q. Okay. Do you see, on the second page, it mentions an Illinois regional conference?
A. Yes.
Q. It says that it was held on April 8 of 2005; is that correct?
A. Yes, that's what it says.
Q. And it describes a Baha'i Center of Knoxville. What's that?
A. The Baha'i Center of Knoxville is one person, Jerry Britton, who tried to teach by calling his house the Baha'i Center of Knoxville.
Q. And that's Knoxville, Illinois?
A. Knoxville, Illinois.
Q. And Jerry Britton, I believe his name came up earlier, he was involved with the -- your group in the 1960s as well [redacted]
A. Yes.
Q. Is that correct. And it goes on to state

that Jo and Robert Clifton of Carbondale and Janice Franco of Barrington attended?
A. Uh-huh, that's what it says.
Q. And then do you recall the next sentence there?
A. "Hand of the Cause called the attendees with a message of unity for the feast of Glory." I don't recall a telephone call.
MR. DOLAN: Okay. All right. Could we go off the record.
THE VIDEOGRAPHER: We are off the record. The time now is 11:37 a.m.
(Recess.)
THE VIDEOGRAPHER: We are back on the record. The time now is 11:50 a.m.
(Exhibit No. 55 was marked.)
BY MR. DOLAN:
Q. Ms. Meyer, we're handing you now Exhibit 55. It's OBF 3164. And what is this document?
A. This is an issue of the Star of the Covenant, September 2005.
Q. Is this an issue that you worked on?
A. Yes, it is.
Q. Okay. Would you turn to 3171, please.
A. Yes.

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Q. Actually, if you turn back to 3170 first, that's the beginning of a letter to you.
A. Okay. Yes.
Q. Do you see that?
A. I see that.
Q. It reads Marilyn Meyer, secretary, and it's dated August 24, 2005. Do you see that?
A. Yes.
Q. And is this a letter from Joel B. Marangella to you?
A. It seems to be.
Q. Do you see, in the second paragraph there, it says that "our efforts have been centered during the past 45 years following the passing of Shoghi Effendi on initially proving the validity of Mason Remey's accession to the guardianship and then upon his abdication, the validity of my own"?
A. I see that sentence.
Q. Is it accurate?
A. Accurate in --
Q. Both in his -- that he made that statement and my reading of it?
A. He made the statement because it's from the letter sent to me.
Q. Okay. And he goes on to say that --

A. You want my agreement or not on what the sentence says?
Q. No, that's okay.
A. You just want me to authenticate the sentence.
Q. That's right.
A. Okay. I authenticate the sentence.
Q. Okay. Do you see further along it says "prior to the availability of the computer and the Internet --"
A. Yes.
Q. "-- for dissemination of information supporting the continuing guardianship to the misled believers, we had to principally rely on the use of newspaper advertisements placed at considerable cost" and it says "without discernible results." Has that been your experience as well as he described there?
A. My experience or am I authenticating the letter again? My experience.
Q. I think you've already authenticated the letter.
A. Okay. You want to know if that has been my experience?
Q. Yes.
A. Let me read it again. I would agree with

that.
(Exhibit No. 56 was marked.)
BY MR. DOLAN:
Q. I'm handing you now what's been marked as Exhibit 56.
THE WITNESS: That's it?
BY MR. DOLAN:
Q. It is. Exhibit 56 is identified as OBF 3899. What is this document?
A. This is an issue of the Star of the Covenant published February 2002, published by the Orthodox Baha'i Faith.
Q. If you could turn in to page 3903, please.
A. All right.
Q. Do you see under Internet Activity?
A. I see that.
Q. It states that "The Council has purchased three domain names"?
A. I see.
Q. And that they are orthodoxbahai.org, orthodoxbahai.net, and orthodoxbahai.com?
A. I see that.
Q. Do you have independent knowledge of that purchase?
A. It was presented to the council so I do have

independent knowledge of that.
Q. Did the council also purchase truebahai.com?
A. The council did not.
Q. Who did, if you know?
A. As far as I know, it belongs to Jeffrey.
Q. Jeffrey Goldberg?
A. Jeffrey Goldberg.
Q. Okay. And then just below there --
A. I may add Sotir. Okay. Go ahead. That's right.
Q. Just below there it states Jeffrey Goldberg has a new web site, it's truebahai.com?
A. Uh-huh, I see that.
Q. And this is in the Star of the Covenant dated February 2002; is that right?
A. Right.
Q. Okay.
(Exhibit No. 57 was marked.)
BY MR. DOLAN:
Q. I'm handing you what's been marked as Exhibit 57. Do you recognize this document?
A. Yes, I recognize it.
Q. And what is it?
A. It's a letter to me as secretary from Joel Marangella dated May 12, 2003.

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Q. Is it -- it looks like maybe it was an email or is this a letter?
A. It originated as an email. This was formatted to go in one of the Star of the Covenants.
Q. Okay. Do you see the subject matter is he's discussing postings and publications of the Orthodox Baha'i Faith. And, at the end of the third paragraph --
A. All right.
Q. -- it reads that the posters do not have to acknowledge that I am the author --
A. Wait a minute, wait a minute. All right. Let's see. The one that starts out with although?
Q. That's correct.
A. All right. Wait a minute. All right. I've read the paragraph.
Q. Okay. Did you read the portion at the end that says "they do not have to, in the case of the four short items, even acknowledge that I am the author as they may be more inclined to read the item if the author is unknown"?
A. I see that sentence.
Q. Do you know if that's how those articles were posted, without attribution to Joel B. Marangella?
A. No, I don't have that in my knowledge at the

present time.
(Exhibit No. 58 was marked.)
BY MR. DOLAN:
Q. I'm handing you Exhibit No. 58. Have you ever transcribed writings of Mason Remey?
A. Only for my own benefit.
Q. Okay. Including letters?
A. Letters, personal letters.
Q. Are you familiar with his handwriting?
A. Oh, yeah.
Q. And his signature as well?
A. It's been a long time.
Q. But are you familiar with his signature?
A. That looks too neat. It does not look like his signature. But no, I can't actually say it is or it isn't.
Q. Okay.
A. There was one thing -- let's see.
Q. Do you see the symbol up in the left-hand corner?
A. I do see the symbol in the left-hand corner.
Q. Is that the same symbol you described as his personal insignia?
A. Yes, it is, yes, it is.
(Exhibit No. 59 was marked.)

BY MR. DOLAN:
Q. Now, we're handing you Exhibit No. 59. This was produced to us in this form. It appears to be a single page from a Glad Tidings. Do you see the handwriting at the top?
A. Yes, I do. That's not my handwriting.
Q. Was that written there by counsel or someone?
A. I have no idea who wrote it.
MR. GOLDBERG: It wasn't me.
MR. DOLAN: Okay.
THE WITNESS: Oh, you wrote that, Jeff?
MR. GOLDBERG: No, it was not me.
THE WITNESS: No, I don't know who wrote that because that's not my handwriting.
BY MR. DOLAN:
Q. Well, it appears to be a page from the Glad Tidings?
A. It does and I have seen it before.
Q. You have. Do you note at the bottom it lists the members of the 1965 to 1966 NSA?
A. Okay.
Q. Is that accurate? They're pictured there as well.
A. Okay. Yes, I identify the people. And, as far as I know, that is -- that does comprise the

members of the '65, '66.
Q. That includes yourself and Mr. Meyer?
A. That's right.
Q. Mr. James Meyer?
A. Uh-huh.
Q. And Franklin Schlatter?
A. Uh-huh.
Q. And six other people as well?
A. Uh-huh.
(Exhibit No. 60 was marked.)
BY MR. DOLAN:
Q. I'm handing you Exhibit No. 60. What is this form? Have you seen this before?
A. Okay. I have not seen this before.
Q. It reads "Members of the Baha'i community under the hereditary guardianship." It has blanks where you can place the community name and then list adult believers. Do you recall, is this how members of the group under the hereditary guardianship would identify their belief to the NSA, did you ever fill out a form like this if you recall?
A. No, no. I'm not familiar with the form or why they filled it out.
Q. Do you know who would have dealt with a form like this?

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A. Perhaps the secretary of the NSA U.S. G.
Q. Does it appear to be a way to verify the mailing addresses and voting ages of members under the hereditary guardianship?
A. It would seem to be an attempt to record who the members were in Missoula, Montana.
Q. Okay. Thanks.
(Exhibit No. 61 was marked.)
BY MR. DOLAN:
Q. I'm handing you what's been marked as Exhibit 61. Do you recognize this letter?
A. Not until I look it over.
Q. Okay. Take your time.
A. Okay. I have to read this in order to identify it. Yes, I wrote that.
Q. You wrote the letter?
A. I wrote the letter.
Q. Did you write it with Jim Meyer or --
A. Yes, yes.
Q. It's dated January 16, 1966?
A. Yeah.
Q. And it's addressed to Mr. Frey, the legal committee, the NSA, the guardian, and Joel Marangella. Do you recall that it was communicated to those people?

A. Yes. It was not addressed to Mr. Frey. It was addressed to -- the subject was Dr. Frey -- or Mr. Frey's letter to John Byers. It was addressed to members of the NSA, the guardian, Mason Remey, and Joel Marangella. Oh, and I do see Mr. Frey. Okay. I beg your pardon.
Q. And then just below that it says "Special attention, legal committee and Mr. Frey."
A. Okay. And Mr. Frey. Okay. I do see that.
(Exhibit No. 62 was marked.)
BY MR. DOLAN:
Q. I'm going to hand you what's been marked as Exhibit 62.
A. Are we done with that?
Q. I am. Thanks.
A. Okay.
Q. This exhibit is a letter and envelope accompanying it. Do you have any independent recollection of receiving this?
MR. GOLDBERG: It's outrageous.
THE WITNESS: I acknowledge the letter.
BY MR. DOLAN:
Q. Okay. And there's an envelope, it's addressed to Ms. Marilyn Meyers, Route 1?
A. Yes, right.

Q. That's your address here that --
A. That was the address before it was changed. Same place, different address, yes.
Q. Okay. Thanks.
(Exhibit No. 63 was marked.)
BY MR. DOLAN:
Q. I'm handing you what's been marked as Exhibit 63. It's OBF 2521.
A. All right. Let's see here. Yes, I acknowledge this.
Q. It's a document with an email cover and then the attachment follows the email cover. Do you see that?
A. Yes, right.
Q. And it's addressed to you, correct?
A. Yes, it's addressed to me.
Q. And it's communicating something from Joel Marangella; is that correct?
A. Yes, it is.
Q. Okay. If you turn to the second page, please, it's titled Proclamation.
A. Yes.
Q. And it -- and this is a proclamation by Joel Bray Marangella; is that correct?
A. That's correct.

Q. Dated September 22, 2006?
A. Yes, uh-huh.
Q. And it starts "It gives me great pleasure on the occasion of my 88th birthday to proclaim the appointment of the Third International Baha'i Council." Was there a second International Baha'i Council?
A. Yes. The second International Baha'i Council was implemented by Mason Remey with Joel as its -- as the first -- first listee underneath.
Q. Okay. And then, if we pan down to the bottom, it says that he has named members to his third International Baha'i Council.
A. Uh-huh.
Q. And listed there as secretary general is Franklin Schlatter?
A. That's correct.
Q. Do you know what the role of secretary general is?
A. As opposed to general secretary? I do not know what secretary general implies.
Q. This was in September of 2006. Based on any of Franklin Schlatter's activities as secretary general since then, can you describe some of the things that the secretary general to the third

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A. Let me find it here. The print is small. This is an email from Joel Marangella to me as secretary for the council dated September 30, 2003.
Q. When you say council, do you mean the Provisional National Baha'i Council?
A. I mean -- yes, right.
Q. And it appears in my review of this that he is appointing Jeffrey Goldberg to the PNBC; is that correct?
A. No. This letter doesn't mention -- oh, the PNBC. Oh, wait a minute. Okay. I told you it was small.
Q. It is. Take your time.
A. Okay. Okay. Yes, he does, at that time he did appoint [redacted]
Q. Is that how someone becomes a member of the Provisional National Baha'i Council, by Mr. Marangella appointing them?
A. The council is appointed at this time as we do not have enough local councils for an election. The way it proceeds is that, when a member for some reason has to leave the council, the council suggests names to the guardian. And the guardian approves it.
Q. So he does appoint members to the Provisional National Baha'i Council?

A. He does, he does make the appointments, yes.
(Exhibit No. 67 was marked.)
BY MR. DOLAN:
Q. I'm handing you now Exhibit 67. It's OBF 5764. Do you recognize this document?
A. I do.
Q. And on the -- is it the minutes of the Provisional National Baha'i Council for January 11, 2004?
A. Yes, it is.
Q. Do you see, at the bottom of the page, under old business?
A. Yes, I do.
Q. A Printing of the Dispensation?
A. Yes, I see that.
Q. And it states that a motion was passed to print 500 copies?
A. I see that.
Q. If you look above there to who is present at that meeting, could you read those names into the record.
A. [redacted]

[redacted]
Q. Does it say attending as guest?
A. It does not.
Q. Was the third guardian Joel B. Marangella aware of your votes on printing the dispensation?
A. Aware of them?
Q. Uh-huh.
A. Mr. Marangella receives the minutes of the council. So wherever they were mentioned in the minutes of the council, he would be aware of our actions.
(Exhibit No. 68 was marked.)
BY MR. DOLAN:
Q. I'm handing you now what's been marked as Exhibit 68. It's OBF 5796. What is this document?
A. This is the minutes of the Provisional National Baha'i Council of the United States dated April 2nd, 2005.
Q. And it was held at the [redacted] residence in Roswell?
A. It was held at [redacted] residence, Roswell, New Mexico, yes.
Q. Could you read into the record who was present at this meeting?
A. [redacted]

[redacted]
Q. If you could turn to 5798, please. Do you see at paragraph 12 there's a line item called Council Meeting For Election of Officers?
A. Yes, I see that.
Q. It states that an election is occurring of officers and that the vote should be sent by email to Frank and he will announce the results. Is that Frank Schlatter?
A. That would be Frank Schlatter.
Q. If you could turn to the next page at 5799, please. Do you see at 17 it says from the guardian?
A. Yes, I see that.
Q. Does that mean these items were communicated by Joel B. Marangella to the PNBC?
A. Let's see. The first one was -- was -- what was the question again?
Q. I was just wondering if you could confirm --
A. I mean just say it, I just forgot.
Q. Sure. It states that -- No. 17 says from the guardian.
A. From the guardian. Oh, I see.
Q. And lists several items. Are these things

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that the guardian had communicated to the secretary that were to be discussed at the meeting -- at the --
A. No. I thought that's what you meant.
Q. Okay.
A. No, the declaration form was brought up by the council. The submission of guardian's articles to encyclopedia was actually brought up from India. The World Order of Baha'u'llah -- let's see.
Q. Why are all of these listed under from the guardian?
A. I don't know.
Q. Okay.
A. I mean I don't know why I did it. I should have put related to the guardian.
Q. I see.
A. Yeah, from the guardian is a misnomer. You want to go down the line or any more?
Q. I just wanted to ask about the declaration form.
A. Yeah.
Q. This says that as of April 2nd, 2005, your declaration form had been changed to include identification of Mason Remey as the second guardian; is that correct?
A. Yes.

Q. Okay.
A. Would you like to know how? I mean the declaration form originally stated that Joel Marangella received his appointment from the second guardian, it did not say the second guardian, Mason Remey. It was like that's the only -- so we inserted the name second guardian Mason Remey in the declaration form.
Q. I see. Thank you. If you see item C, it states that the guardian, that's Joel B. Marangella, correct?
A. Uh-huh.
Q. Is sending 50 hardcover copies of the World Order of Baha'u'llah Continues to the council. Did you receive those?
A. I received those, yes. They were sent to my address.
Q. Did you work on contacting state libraries to place these volumes or not?
A. The council appointed [redacted] to undertake that task.
Q. How does the council go about appointing someone to a task?
A. You say, [redacted] will you do this. He says yes, we say you're appointed.

Q. Okay. I think we need to identify this still.
(Exhibit No. 69 was marked.)
BY MR. DOLAN:
Q. I'm handing you what's been marked as Exhibit 69. Do you recognize this document?
A. Yes, I do.
Q. And what is it?
A. It's a communication from Joel Marangella to -- addressed to Frank Schlatter with copies to the Hands of the Cause dated October 15, 2006.
Q. And that's Joel B. Marangella?
A. That is Joel B. Marangella.
Q. It states at the front it's addressed -- at the top it's addressed to Frank. And it states "I am asking Frank to convene and chair a meeting with those hands who will be attending the upcoming conference to discuss additional ways and means of promoting the Cause of God." Where he refers to the Cause of God, is he referring to the Orthodox Baha'i Faith under Joel B. Marangella?
A. I couldn't say that. He sometimes is all inclusive. The Cause of God is the original faith of Baha'u'llah. So I can't say that that's just the Orthodox Baha'i Faith.

Q. But all the people on this email are orthodox Baha'i followers --
A. Yes.
Q. -- of Joel B. Marangella, correct?
A. Yes, they're all Hands of the Cause.
Q. Okay.
A. This was not sent out to the general believers, yeah.
Q. This was for the Hands of the Cause to coordinate and make plans --
A. Yes, right.
Q. -- for their activities?
A. Right.
Q. Is it often the case that Frank Schlatter is the person to convene and chair meetings such as this?
A. Often -- repeat the question again.
Q. Is it often the case that Frank Schlatter is the person to convene and chair meetings such as this one?
A. There had never been a meeting such as this one. This was the first convening. And, since Frank was the oldest hand, I'm sure that's why he was asked to do that. This was shortly after Joel Marangella appointed the second contingent of Hands of the Cause. So there had been no convening. So he had to make

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1 contact with someone.
2 Q. I see.
3 A. And Frank being the oldest -- not oldest in
4 age but longest senior Hand of the Cause.
5 Q. I see. So it wasn't a surprise that he was
6 the chair of a meeting like that?
7 A. No, it was not.
8 Q. Do you recall the 2006 membership list that
9 we reviewed earlier?
10 A. Yeah.
11 Q. Do all of the people on that list receive
12 newsletters that are produced by the orthodox Baha'i
13 faith?
14 A. Do you got the membership list? I could look
15 it over again.
16 MR. GOLDBERG: Do you want the current PNBC?
17 I think it's Exhibit 41. I just had it out of order,
18 that's how I know.
19 Q. Maybe, if you can flip through to 41 on your
20 stack, you would be able to find it.
21 A. Forty-one. Okay. Forty-four, 42, 41. Okay.
22 I have it. All right. Now, the question again?
23 Q. The question is that's the membership list.
24 And are the newsletters distributed to all of the
25 people on those membership lists, on that membership

1 list I should say?
2 A. Yes, they are.
3 Q. Does that include the older newsletter and
4 the new Harbinger of a New Era newsletter, would it be
5 the same list?
6 A. Since I don't mail out the Harbinger, I can't
7 answer that.
8 Q. Would you expect that --
9 A. I would expect it would be the same list.
10 Q. Do you receive copies of it?
11 A. Of the Harbinger, yes. I think it's only had
12 two copies, two issues.
13 MR. GOLDBERG: Don't ask me.
14 THE WITNESS: Two issues I think. I think,
15 yeah, there's only been two issues.
16 MR. DOLAN: Can we mark this exhibit too.
17 THE WITNESS: Or maybe three.
18 (Exhibit No. 70 was marked.)
19 BY MR. DOLAN:
20 Q. We've just marked as Exhibit --
21 A. Volume 1, No. 2, yes. Harbinger of the New
22 Day.
23 MR. GOLDBERG: What's the exhibit number, 69?
24 MR. DOLAN: Seventy.
25 MR. GOLDBERG: Seventy.

1 BY MR. DOLAN:
2 Q. And it's OBF 2540. Is this the new
3 newsletter that you described earlier?
4 A. It is.
5 Q. And it's dated January 2007; is that correct?
6 A. That's correct.
7 Q. Do you see, on the first page, it indicates
8 the injunctive language from the 1966 judgment on the
9 second column?
10 A. What word did you use? English, please.
11 Q. The injunctive.
12 A. Oh, injunctive.
13 Q. The 1966 judgement language.
14 A. Yes, I see that.
15 Q. Then, if you flip a page to the back, it
16 indicates at the end that all the documents on the
17 case can be found at the following web site,
18 www.truebahai.com.
19 A. It does say that.
20 Q. Is that right, are all those documents on
21 that site?
22 A. I don't know.
23 Q. Okay.
24 A. I don't know all the documents. And I've
25 looked at the web site. But I don't know what all the

1 documents would refer to.
2 MR. DOLAN: Okay. If we can go off the
3 record for a moment.
4 THE VIDEOGRAPHER: We are off the record.
5 The time now is 12:30 p.m.
6 (Recess from 12:30 p.m. to 1:51 p.m.)
7 THE VIDEOGRAPHER: We are back on the record.
8 The time now is 1:51 p.m.
9 MR. DOLAN: I have nothing further at this
10 time.
11 EXAMINATION
12 BY MR. GOLDBERG:
13 Q. Okay. I have a few questions for you just to
14 clarify some of the things that you testified to.
15 A. Okay.
16 Q. You said that the goal of the National
17 Spiritual Assembly of the -- under the Remey
18 organization was to teach the guardianship. Can you
19 tell me what that means, what does it mean, what is
20 the guardianship?
21 A. The guardianship is the unique feature of the
22 revelation of Baha'u'llah. It is the guardian -- we
23 should -- that we should never be without a point of
24 guidance. The guardian's job is to interpret the
25 writings among other things, to elucidate on the

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1 secret ballot, you have to be in one place. Okay.
2 The only way we could do that was to have a member
3 outside of the sitting council take the votes if we
4 did it by email.
5 So Frank was a logical choice, we trust him.
6 And so we would send in our votes by email. And Frank
7 would correlate them, report the outcome to us, in
8 which then we would -- outcome reported to the
9 guardian, he would approve.
10 But it was a matter of -- we simply could not
11 get together for an election. So we did it by email.
12 So Frank was actually the only one who ever knew what
13 the ballots were.
14 Q. Okay. I want to talk to you about Exhibit
15 61, if you could find that.
16 A. Sixty-one?
17 Q. Yeah.
18 A. Fifty-five, 63, where is 61? Who messed with
19 these? What is it?
20 Q. It's this letter here.
21 A. Oh. Sixty-one. Here we are. Okay.
22 Q. These are your comments?
23 A. James and I formed them up.
24 Q. Are they your personal comments or are they
25 in some capacity?

1 A. Oh, they were -- since they're addressed to
2 the members of the NSA, I'm presuming that these were
3 our comments when we were serving on the NSA under the
4 hereditary guardianship.
5 Q. I'm trying to understand the context of these
6 comments. You're talking to a legal committee. In
7 what context, what are you considering?
8 A. All right. What's the date on this? What
9 are we considering. I think -- let's see. I think
10 the topic in question must have been shall we take
11 another name.
12 Q. Another name besides Baha'i?
13 A. Besides Baha'i. My quote here is that, if we
14 take another name, we're a splinter group. Once you
15 choose another name, you admit the cause you've been
16 supporting has a shaky foundation. We had been
17 operating under the hereditary guardianship only until
18 we received back our rightful name, the Baha'i World
19 Faith.
20 Q. So there is a competing -- in this lawsuit
21 that you guys are dealing with here, you have two
22 competing groups that both kind of take the same
23 position?
24 MR. DOLAN: Objection, leading.
25 THE WITNESS: Essentially.

1 BY MR. GOLDBERG:
2 Q. So the NSA -- the Wilmette NSA I should say
3 calls itself the NSA and your organization also called
4 yourself NSA?
5 MR. DOLAN: Objection, leading.
6 THE WITNESS: I don't believe that it was the
7 question of using the term NSA, it was a question of
8 using the term Baha'i in our name.
9 BY MR. GOLDBERG:
10 Q. Both organizations saying it was the Baha'i
11 faith?
12 A. Both organizations claiming -- yeah. Well,
13 we not claiming the sole use. We were wanting to use
14 it to define our position.
15 Q. What does Baha'i mean?
16 A. Baha'i means follower of Baha'u'llah. And
17 Baha'u'llah means the light. So Baha'i is a follower
18 of the light. It's --
19 Q. So, when you call yourself a Baha'i, what are
20 you saying?
21 A. When I call myself a Baha'i, I am a follower
22 of Baha'u'llah.
23 Q. Can other people call themselves Baha'is who
24 are in the Orthodox Baha'i Faith?
25 MR. DOLAN: Objection. I think we're getting

1 a little outside the scope at this point.
2 THE WITNESS: Well, shall I answer that or
3 not.
4 BY MR. GOLDBERG:
5 Q. Yes.
6 A. Okay. What was the question, can other
7 people call themselves Baha'i?
8 Q. Yes, besides members of the Orthodox Baha'i
9 Faith.
10 A. Yes, they can. And many do. Even back in
11 the sixties.
12 Q. Okay. I want to refer you to Exhibit No. 63.
13 A. Okay.
14 Q. It's the proclamation.
15 A. Okay.
16 Q. You talked about a first IBC and a second IBC
17 and now we have a third IBC. And I wanted to
18 understand this. The third IBC was just created here,
19 correct?
20 A. Yes.
21 MR. DOLAN: Objection, leading.
22 BY MR. GOLDBERG:
23 Q. Under Joel Marangella?
24 A. Okay. When was it, yes. September '06.
25 Q. And I believe you testified the second IBC

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A. Uh-huh.
Q. You see it looks like there's at least ten shelves high and it looks like it spans across the room of literature?
A. Uh-huh.
Q. Do you know if some of those materials ended up in the national archives, did they maybe remain with your property after August 1966?
A. I'm trying to think what we did with them. I'm sure some of them did because there was literature, for instance, some of Mason Remey's early literature on the catastrophe. And I'm trying to think -- I'm trying to think what the literature at that time consisted of. I'm not sure what happened to those.
Q. Okay.
A. I am not sure.
Q. Mr. Goldberg --
A. The house no longer exists.
Q. I'm sorry.
A. The house no longer exists that they were in.
Q. Okay. Mr. Goldberg also asked you if the PNBC reviews the content of truebahai.com. Is that web site -- would you say that that web site is Jeffrey Goldberg's web site and domain name?

A. I would say that.
Q. And is [redacted] on the PNBC?
A. [redacted] is on the PNBC.
Q. Is he also a Hand of the Cause?
A. He is a Hand of the Cause.
Q. You also mentioned personal web sites. Has Joel Marangella ever encouraged orthodox Baha'i believers to have personal web pages?
A. I don't believe so. He encouraged us to post on the news groups. I don't believe he encouraged personal web pages.
Q. Do you know if anyone on the PNBC has ever encouraged members of the orthodox Baha'i community to create personal web pages?
A. The PNBC as a body has encouraged the friends to open their own web sites.
Q. You also mentioned in response to [redacted] questions that Frank Schlatter didn't vote on PNBC matters after he left the council?
A. That's true.
Q. But he did attend meetings?
A. He did attend meetings. Not -- not every meeting.
Q. Okay. The meetings that he did attend, did he join in on discussions of the matters that the PNBC

ultimately voted upon?
A. Not unless -- he did not spontaneously enter the discussion. If some member of the PNBC asked him a question, he would respond with his knowledge of history, advice, that sort of thing. He did not jump into the discussions, no.
MR. DOLAN: Okay. I've got nothing further. Thank you very much.
THE WITNESS: That's it.
THE VIDEOGRAPHER: This concludes today's videotaped deposition of Marilyn Meyer. The time now is 2:48 p.m. We are off the record.
(At 2:48 p.m. the deposition was concluded.)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION
THE NATIONAL SPIRITUAL ASSEMBLY OF THE BAHAI'S OF THE UNITED STATES OF AMERICA UNDER THE HEREDITARY GUARDIANSHIP, INC.,

Counter-Defendant,

vs. Civil Action No. 64 C 1878
The Honorable Amy J. St. Eve
NATIONAL SPIRITUAL ASSEMBLY OF THE BAHAI'S OF THE UNITED STATES OF AMERICA, INC.,

Counterclaimant.

CERTIFICATE OF COMPLETION OF DEPOSITION
I, JAN A. WILLIAMS, New Mexico CCR #14, DO HEREBY CERTIFY that on April 18, 2007, the deposition of MARILYN K. MEYER was taken before me at the request of, and sealed original retained by:

For the Counterclaimant:
BRINKS HOFER GILSON & LIONE
NBC Tower - Suite 3600
455 N. Cityfront Plaza Drive
Chicago, Illinois 60611-5599
MR. CHRISTOPHER M. DOLAN

I FURTHER CERTIFY that copies of this certificate have been mailed or delivered on _____, with changes, if any, by the witness appended, to the following counsel of record and parties not represented by Counsel:

For the Counter-Defendant:
MR. JEFFREY A. GOLDBERG
P.O. Box 254
Albuquerque, New Mexico 87103-0254

I FURTHER CERTIFY that examination of this transcript and signature of the witness was requested by the witness and all parties present.

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On _____, a letter was mailed or delivered to MR. JEFFREY A. GOLDBERG regarding obtaining signature of the witness.

I FURTHER CERTIFY that the recoverable cost of the original and one copy of the deposition, including exhibits, to MR. CHRISTOPHER M. DOLAN is $_____.

I FURTHER CERTIFY that I did administer the oath to the witness herein prior to the taking of this deposition; that I did thereafter report in stenographic shorthand the questions and answers set forth herein, and the foregoing is a true and correct transcript of the proceeding had upon the taking of this deposition to the best of my ability.

I FURTHER CERTIFY that I am neither employed by nor related to nor contracted with (unless excepted by the rules) any of the parties or attorneys in this case, and that I have no interest whatsoever in the final disposition of this case in any court.

_____
JAN A. WILLIAMS
Certified Court Reporter #14
License Expires: 12/31/07

(3621A) JAW
Date taken: April 18, 2007
Proofread by: JB

NSA (Hereditary) vs. NSA
WITNESS SIGNATURE/CORRECTION PAGE

If there are any typographical errors to your deposition, indicate them below:

PAGE LINE
_____ Change to _____
_____ Change to _____
_____ Change to _____
_____ Change to _____

Any other changes to your deposition are to be listed below with a statement as to the reason for such change.

PAGE LINE CORRECTION REASON FOR CHANGE
_____
_____
_____
_____
_____
_____

I, MARILYN K. MEYER, do hereby certify that I have read the foregoing pages of my testimony as transcribed and that the same is a true and correct transcript of the testimony given by me in this deposition on April 18, 2007, except for the changes made.

_____ _____
DATE SIGNED MARILYN K. MEYER

(3621A) JAW
Proofed by: JB

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

THE NATIONAL SPIRITUAL ASSEMBLY OF THE BAHAI'S OF THE UNITED STATES OF AMERICA UNDER THE HEREDITARY GUARDIANSHIP, INC.,

Counter-Defendant,

vs. Civil Action No. 64 C 1878
The Honorable Amy J. St. Eve

NATIONAL SPIRITUAL ASSEMBLY OF THE BAHAI'S OF THE UNITED STATES OF AMERICA, INC.,

Counterclaimant.

AFFIDAVIT

Deposition of: MARILYN K. MEYER

Date taken: April 18, 2007

The witness in this case was notified of the need for signature on _____.

Failure of the witness to timely sign this deposition has resulted in the filing of this deposition on _____.

_____BEAN & ASSOCIATES, INC.

(3621A) JAW

DATE DELIVERED: _____
MR. JEFFREY A. GOLDBERG
P.O. Box 254
Albuquerque, New Mexico 87103-0254
RE: NSA (Hereditary) vs. NSA
DEPOSITION OF: MARILYN K. MEYER
DATE TAKEN: April 18, 2007
Dear MR. JEFFREY A. GOLDBERG:

At the time of the above deposition/sworn statement, it was requested that the witness read and sign his/her transcript.

_____Enclosed is your copy of the transcript with the original signature page. Please ask the witness to read the transcript, make any corrections on the signature page, and return the original signature page to our Albuquerque office.

_____Enclosed is your copy of the transcript. Please read it, note any corrections on the signature page, and return the original signature page to our Albuquerque office. You may keep the transcript for your files.

_____The transcript is now ready to review. Please contact our Albuquerque office, 505-843-9494, to make arrangements to have the transcript read and signed. If you live outside the Albuquerque area, please call 1-800-669-9492.

_____The transcript is now ready for review. Please remit payment in the amount of $_____ to our Albuquerque office. As soon as payment is received, your transcript will be delivered. If you choose not to pay, please contact our Albuquerque office, 505-843-9494, to make arrangements for signature.

_____Trial in this matter is set for _____. If the transcript has not been read and signed before that date, the original will be filed without a signature.

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1 _____Other:_____
_____
2 _____
3 The Federal Rules of Civil Procedure provide the
witness 30 days in most instances from the receipt of
4 this letter to read and sign his/her transcript. If
he/she has not read and signed the transcript in that
5 time, we will file the original transcript without the
signature page.
6
Sincerely,
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BEAN & ASSOCIATES, INC.
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25 (3621A) JAW

1 RECEIPT
2 DATE: April 18, 2007
3 JOB NUMBER: (3621A) JAW
4 WITNESS NAME: MARILYN K. MEYER
5 CASE CAPTION: NSA (Hereditary) vs. NSA
6 **********
7 ATTORNEY: MR. CHRISTOPHER M. DOLAN
8 DOCUMENT: Transcript / Exhibits / Disks / Other _____
9 DATE DELIVERED: _____ DEL'D BY: _____
10 REC'D BY: _____ TIME: _____
11 **********
12 ATTORNEY: MR. JEFFREY A. GOLDBERG
13 DOCUMENT: Transcript / Exhibits / Disks / Other _____
14 DATE DELIVERED: _____ DEL'D BY: _____
15 REC'D BY: _____ TIME: _____
16 **********
17 ATTORNEY:
18 DOCUMENT: Transcript / Exhibits / Disks / Other _____
19 DATE DELIVERED: _____ DEL'D BY: _____
20 REC'D BY: _____ TIME: _____
21 **********
22 ATTORNEY:
23 DOCUMENT: Transcript / Exhibits / Disks / Other _____
24 DATE DELIVERED: _____ DEL'D BY: _____
25 REC'D BY: _____ TIME: _____

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C/O American Express Co.
Florence, Italy
January 10, 1963

To: The City Editor
The DES MOINES REGISTER,
Des Moines, Iowa, U.S.A.

Dear Sir,

I am a Native of Iowa - the grandson of Charles Mason, the First Chief Justice of Iowa and now I am the Guardian for life of the Baha'i (Orthodox) World Faith.

My official residence is in the Holy City of Jerusalem but on account of the upset conditions of the war in Israel, Florence, Italy is my present home.

Mrs. Ruth S. Beitz of Des Moines writes me of a conference to be held at the Y.M.C.A. in Des Moines on WORLD RELIGIONS DAY this coming 19th of January, where the largest and most spread-abroad organization of Hetrodox Baha'is will be gathered.

I, as Guardian of the Baha'i Faith, would like very much to have the "Orthodox" Faith represented on World Religions Day in a gathering in Des Moines but at this late date I am not able to arrange for this. However, if you have some one on your staff who would be interested in writing an article upon the Orthodox Baha'i Faith, I would be very happy to have you publish this.

Enclosed I send you several articles that will give you an idea of The Message that The Baha'i Faith has for the world and in the many volumes of my Reminiscences that are in the Historical Library of Iowa (in the Building near the Capital) you will find a number of volumes of my activities and my travels about the world that are available to all.

The Baha'i Faith is a very personal religion. Many find it interesting even when they don't believe what it offers to Truth Seekers.

Sincerely Yours,

Charles Mason Remey Jr.
CHARLES MASON REMEY

EXHIBIT
58
BEAN & ASSOCIATES, Inc.

OBF 001003