

Paris, le 22 mai 1960.

Bien chers Amis,

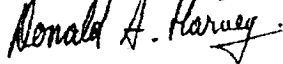
Ceci n'est pas une lettre de votre Assemblée spirituelle nationale; c'est une communication, en tant qu'individus bahá'ís, des cinq membres majoritaires de l'Assemblée spirituelle nationale des Bahá'ís de France ayant accepté et reconnu le Second Gardien de la Foi, Mason Remey.

Nous vous devons l'explication de nos actes du 7 mai 1960. Devant l'évidence d'une possibilité de division dans la Communauté bahá'íe de France, et pour qu'il n'y ait pas d'antagonisme, nous avons estimé que le status-quo de votre Assemblée spirituelle nationale serait en ce moment l'attitude la plus neutre. Pour ce faire, et sachant que toute démission, selon l'Administration bahá'íe, à l'intérieur d'une Assemblée spirituelle nationale, doit être acceptée par cette Assemblée (naturellement par majorité - (Article six des Statuts de l'Assemblée spirituelle nationale de Bahá'ís de France), nous avons déposé dans des enveloppes fermées adressées au nom de l'Assemblée spirituelle nationale des Bahá'ís de France, à l'intérieur de la boîte à courrier de l'Assemblée spirituelle nationale des Bahá'ís de France, dans le Secrétariat au Centre national bahá'í (boîte ouverte), nos démissions respectives.

Tant que notre Second Gardien, Mason Remey, ne demandera pas à votre Assemblée spirituelle nationale de reprendre ses activités (Article neuf des Statuts de l'Assemblée spirituelle nationale de Bahá'ís de France), nous ne servirons que d'intermédiaires entre lui et vous.

Ci-joint la première Lettre encyclique d'une série que vous envoie votre Gardien. D'autre part, nous vous joignons une copie des Statuts légaux régissant l'Assemblée spirituelle nationale des Bahá'ís de France par rapport au Gouvernement de ce pays.

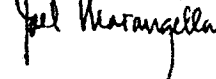
Donald Harvey



Monir Derakhchan



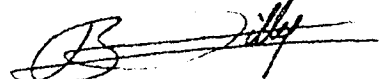
Joel Marangella



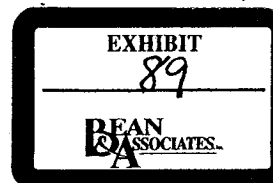
Jacques Soghomonian



Bernard Fillon



.../...



OBF 006390

July 5, 1966

Second International Baha'i Council  
under the Hereditary Guardianship

Second Conseil International Baha'i  
sous le Gardiennat héréditaire

Switzerland  
5 July 1966

President: Joel B. Marangella

Vice-Presidents In order  
named by Second Guardian:

- Monir Derakhchan
- Nawasish Ali Syyid
- John B. Byers
- James Barrett
- Jean Donat
- Bernard Fillon
- Clarence M. McClymonds

*The National Spiritual Assembly  
of the Baha'is of the United States  
Under the Hereditary Guardianship  
Franklin Schlatter, Secretary  
Santa Fe, New Mexico*

Dear Baha'i friends and co-workers,

Effective 24 June 1966 the Guardian has appointed our dear Baha'i brother, Donald Harvey the next Vice President, in line, of the Second International Baha'i Council, Under the Hereditary Guardianship. No geographical area has been assigned to Donald for the time being.

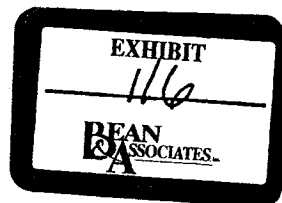
The Guardian has requested that this announcement be made to the Baha'i world. As *The Glad Tidings* is the best instrument for this purpose, your publication of this announcement in the next issue of that publication will be appreciated.

Would you kindly at the same time rectify an error on my part pertaining to the geographical area for which Jean Donat is responsible. It should be the islands of the Indian ocean instead of Pacific ocean.

With loving Baha'i greetings and best wishes,

Faithfully, your spiritual brother  
in the service of the Guardian,

*Joel Marangella*  
Joel B. Marangella, President



OBF 000286

Page 26	Page 28
<p>1 Council is in charge -- or was with me of a 2 newsletter. And that was not the case with the Mason 3 Remy. 4 Q. Is that the only difference? 5 A. That was the major difference. Believe me, 6 that's a major difference. 7 Q. A lot more work? 8 A. Yes. 9 Q. Did you hold any other positions with the 10 PNBC? 11 A. No, no. 12 Q. Just to clarify, when we're discussing the 13 Provisional National Baha'i Council, you're referring 14 to a nine-member board that's an administrative body 15 over the followers of Joel B. Marangella in the United 16 States? 17 A. That is correct. 18 Q. What was the period of your term as secretary 19 for the PNBC? 20 A. You have to bear in mind now that the PNBC 21 and the Mother Baha'i Council are one and the same 22 institution. So from 1978 to the year 2001. 23 Q. And your duties as secretary were the same 24 throughout that period? 25 A. Yes.</p>	<p>1 A. Yes. 2 Q. It's obfusa@rt66.com. 3 A. Yes. 4 Q. That's your email address again? 5 A. That is my email address. 6 (Exhibit No. 89 was marked.) 7 BY MR. DOLAN: 8 Q. I've got another exhibit for you to look at, 9 please. This is marked as Exhibit 89. The first 10 thing you'll notice I imagine is that it's in French. 11 But I'll ask if recognize this document? 12 A. No. 13 Q. Do you see where there are five names at the 14 bottom of the first page? 15 A. Yes. 16 Q. Typed and signatures? 17 A. Yes. 18 Q. Do you recognize those names? 19 A. Yes. 20 Q. Who are they? 21 A. They are individuals who were on the French 22 National Spiritual Assembly. 23 Q. You say that they were on the French National 24 Spiritual Assembly. What do you mean when you say 25 that --</p>
Page 27	Page 29
<p>1 (Exhibit No. 88 was marked.) 2 BY MR. DOLAN: 3 Q. I hand you what's been marked as Exhibit 88. 4 Did you write this? 5 A. Yeah, I did, yes. 6 Q. And what is it? 7 A. It's my experience in becoming an orthodox 8 Baha'i. 9 Q. Is this an article that was posted to the 10 official Provisional National Baha'i Council web site? 11 A. Yes. 12 Q. If you could turn to the second page, please. 13 There's a link towards the bottom of the page that 14 says "When you accept the orthodox teachings, what 15 then?" What happens if an Internet user clicks on 16 that link? 17 A. I'm not sure. I would imagine Jeff could 18 answer that question better than I could. 19 MR. DOLAN: Do you want to answer it, Jeff? 20 MR. GOLDBERG: I'm not being deposed today. 21 MR. DOLAN: Fair enough. 22 MR. GOLDBERG: And actually I don't know. 23 BY MR. DOLAN: 24 Q. Do you see the email address at the bottom of 25 that page?</p>	<p>1 A. They were the National Spiritual Assembly 2 which accepted Mason Remy. 3 Q. Okay. So was that spiritual assembly 4 disbanded after they accepted Mason Remy? 5 A. That spiritual assembly was terminated by the 6 Hands of the Faith. 7 Q. From Haifa, Israel? 8 A. Yes. 9 Q. So was it these five people then in the 10 French NSA who had accepted Mason Remy being Donald 11 Harvey, Joel Marangella, Bernard Fillon, Monir 12 Derakhchan, and Jacques Soghomonian? 13 A. Yes. 14 Q. And do you know the date that they were -- 15 that their NSA was terminated? 16 A. Not offhand, no. 17 Q. Can you see the date of this letter? 18 A. Yes. 19 Q. It's May 22nd, 1960? 20 A. Yes. 21 Q. Did these five people then reform an 22 organization to assist Mason Remy in his claim as 23 second guardian? 24 A. I think they continued on until the end of 25 that year and then that was it. I don't think</p>

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1 anything more developed after that.  
 2 Q. Were these five people people that operated  
 3 to support Mason Remey's claim as second guardian?  
 4 A. I can't answer that. I don't know.  
 5 Q. Can you answer with respect to any of them?  
 6 A. I could answer with respect to Joel  
 7 Marangella. I suppose because he was in contact with  
 8 me.  
 9 Q. All five of those people to your knowledge  
 10 were removed from the NSA because they had accepted  
 11 Mason Remey's proclamation to be guardian; is that  
 12 correct?  
 13 A. They were cast out of the faith by the hands.  
 14 Q. Do you know if any of them were later on a  
 15 body called the second International Baha'i Council  
 16 that Mason Remey established in the 1960s?  
 17 A. Joel Marangella was on the original.  
 18 Q. And what was his position?  
 19 A. He was the president.  
 20 Q. Do you know if any of the others of that five  
 21 were?  
 22 A. ~~Monir~~ Derakhchan I believe was on. And  
 23 Donald Harvey was not on the original. He was named  
 24 to the organization about a year after the others.  
 25 Q. Was he named to a -- prior to the injunction

Page 31

1 in this case?  
 2 A. No, I don't believe he was.  
 3 Q. When do you think he was named to it?  
 4 A. July 15th, 1965. Then it would have been  
 5 before. Wait. July 15, 1966, he was named.  
 6 Q. Can you recall if Bernard Fillon was on the  
 7 second International Baha'i Council?  
 8 A. No.  
 9 Q. Not to your recollection?  
 10 A. Not to my recollection.  
 11 Q. Just to be clear, are you answering that he  
 12 was not or are you answering that you don't remember?  
 13 A. I'm asking that I don't -- I don't know.  
 14 (Exhibit No. 90 was marked.)  
 15 BY MR. DOLAN:  
 16 Q. I'm handing you another document, it's been  
 17 marked Exhibit 90. Do you recognize this document?  
 18 A. I -- yes, I recognize it.  
 19 Q. And what is it?  
 20 A. It's a letter from Joel B. Marangella to me  
 21 of 18 August 1960 in which he responds to my having  
 22 developed an article about the guardianship. And he  
 23 is maintaining that it complements his own work.  
 24 Q. Do you see, in the second paragraph, it says  
 25 I believe "It was indeed a joy to learn that you had

Page 32

1 embraced our beloved second guardian." Is that  
 2 referring to Mason Remey?  
 3 A. That is referring to Mason Remey.  
 4 Q. So this was in response to you writing him to  
 5 inform him that you had accepted Mason Remey as  
 6 guardian?  
 7 A. Yes.  
 8 (Exhibit No. 91 was marked.)  
 9 BY MR. DOLAN:  
 10 Q. I hand you another exhibit, it's marked 91.  
 11 Do you recognize this letter?  
 12 A. Yes.  
 13 Q. Was this addressed to you and your wife?  
 14 A. This is addressed to Carole and me, yes.  
 15 Q. What's the date?  
 16 A. 23 September 1960.  
 17 Q. Do you see, in the first paragraph, it states  
 18 that he's writing from the home of John and Madeline  
 19 Byers, having just read your letter?  
 20 A. Yes.  
 21 Q. Who are John and Madeline Byers?  
 22 A. They were Baha'is at the time and they were  
 23 living in France.  
 24 Q. When you say they were Baha'is at the time,  
 25 do you mean that they were Baha'is under the

Page 33

1 hereditary guardianship?  
 2 A. Yes. I think that they were Baha'is prior to  
 3 the hereditary guardianship as well.  
 4 Q. And had they been removed from the faith or  
 5 had they removed themselves from --  
 6 A. I can't answer that, I don't know.  
 7 Q. Do you recall if either of them were in the  
 8 second International Baha'i Council?  
 9 A. John Byers was.  
 10 Q. Do you recall if either of them were in the  
 11 NSA Under the Hereditary Guardianship in the U.S.?  
 12 A. Yes -- no, no, correction. Ask the question  
 13 again.  
 14 Q. Do you recall if either of them were in the  
 15 NSA Under the Hereditary Guardianship in the U.S.?  
 16 A. The NSA, yes, they both were.  
 17 Q. Do you see, in the second paragraph, he  
 18 says -- he refers to wonderful news in Quincy. Do you  
 19 know what he is referring to there?  
 20 A. I believe I do.  
 21 Q. And what is he referring to?  
 22 A. Marion Rhodes, Carole, and I went to Quincy  
 23 and talked to them about the guardianship of Mason  
 24 Remey. And at the time they had not made their  
 25 declarations. And it was subsequent to our trip there

1 injunction, because '66 was the injunction.

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

5 BY MR GOLDBERG: Thank you.

6 BY MR DOLAN:

7 Q. Do you recognise this copy?

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

9 BY MR DOLAN: It's number 89.

10 BY MR GOLDBERG: Thank you.

11 BY MR DOLAN:

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

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

15 Q. And who are those five people?

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

19 Q. And yourself?

20 A. And myself.

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

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

23 BY MR GOLDBERG: Let him ask it.

24 BY MR DOLAN:

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

1 French NSA, that decided to follow Mason Remey?

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

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

10 A. Yes, yes. Yes, definitely.

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

14 A. Well, you know to say "work" is a misnomer,  
15 because actually members of the Second Council lived in  
16 various parts of the world; you know, very - it was  
17 impossible to get together, and we only - Mason Remey  
18 dissolved the Council a year afterwards. During that  
19 year, there was practically no activity - no activity  
20 on that body. As a matter of fact, I can't remember -  
21 it was impossible to be convened as a functioning body.

22 And I - off-hand, can't recall at this stage an  
23 individual task that I was going to give them. I can't  
24 recall assigning individual tasks at this time to any  
25 of them - during that one-year period.

# EXHIBIT 3

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**REDACTED**

Q. Okay. Was a person named Brent Reed ever a member of the Orthodox Baha'i Faith?

A. Yes.

Q. When was that?

A. Gosh, when was it. A few years ago. That's the best I can do, I can't remember specific dates on him.

Q. Would you say four years ago or more than that or less?

1 A. He was a member during the time that we met  
 2 in Chicago. So was that 1999?  
 3 Q. I think that's what you testified to earlier.  
 4 A. I think that's what I testified to earlier.

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# EXHIBIT 4

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

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

6 A. Right.

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

9 A. Right.

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

14 A. Carre.

15 Q. Carre. How did you know John Carre?

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

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

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

1 Q. Was John Carre involved with the French NSA?

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

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

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

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

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

13 Q. Here you're sharing - - -

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

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

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

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

25

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

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

4 BY MR DOLAN:

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

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

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

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

18 Q. I've got an exhibit for you. It's exhibit  
19 146.

20 A. Yes.

21 Q. What is this document?

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

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

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

5 A. When I opened - when I opened that envelope in  
6 64, I did that when I was appointed President of the  
7 Second International Council because I realised the  
8 implication of that appointment so then I thought,  
9 well, then I'll open this document and I opened it.  
10 That's when he informed me - told me to tell - not  
11 himself - me to tell - tell you to tell the Baha'i  
12 world that I appoint you the third Guardian of the  
13 Baha'i Faith.

14 Q. This is dated - - -

15 A. That's one - this right - letter was, I think,  
16 5 December 1961.

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

19 A. During Ridvan, yes.

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

22 A. Right. Right.

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

25 A. Right.

1 Q. Why is that?

2 A. Well, you know, he had passed through Paris  
3 several times and go to my apartment and then I was on  
4 the Spiritual Assembly there then in Paris and he knew  
5 - I had known Mason Remey for years, he knew my service  
6 to the faith for years. So he apparently decided that  
7 I was most eligible up to a point, just like I say.

8 Q. When you say that he has passed through Paris  
9 several times, so what time period were you referring  
10 to?

11 A. Well, I mean, it had there been - we arrived  
12 in Paris in 1950, so it had to be some time between  
13 1950 and 1954 when we were living in Paris, he had been  
14 to a fire side - (inaudible) where they had firesides.

15 And then one day, also he had been to the Local  
16 Spiritual Assembly in Paris - one occasion. I sat by  
17 (inaudible) at this day, having coffee with him, at  
18 (inaudible). Also the Left Bank, so I've known him  
19 quite well. And also I've been - I've been to his  
20 house in Washington DC, a beautiful home in Washington  
21 DC and he climbed the Mattahorn when he was 75-years of  
22 age and he showed me the pick axe he used when he  
23 climbed the Mattahorn. So he - he was a good, long-  
24 time friend.

25 Q. Did you discuss his proclamation with him

# EXHIBIT 5

From: [REDACTED]  
Sent: 15 June 2004 15:09  
To: Bahá'í World Centre; NSA of Finland  
Subject: Fraudulent webpage about the Universal House of Justice.

To: The Secretariat of the Universal House of Justice

Dear Baha'i friends,

While searching on the Internet for various references related to the Baha'i administration, and particularly the Constitution of the Universal House of Justice, I came across a fraudulent webpage at <<http://www.uhj.net/>> which claims to be the "official" site of the Universal House of Justice.

While apparently a Covenant breaker site, the webpage boasts with a beautiful and recent picture of the Shirne of the Bab on its cover. Immediately upon realizing its malignant nature, I left the site; such experiences, coming unexpectedly and by surprise, are indeed unpleasant.

You are probably already aware of the existence of this Internet site, but I decided, nonetheless, to notify you, in case the knowledge has not reached the World Centre previously.

With loving Baha'i greetings,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Saturday, August 14, 2004 10:46 PM  
**To:** Bahá'í World Centre  
**Subject:** false 'Baha'i' websites

Dear Universal House of Justice,

I am writing to express my apologies and concern over a site I accidentally visited a couple of months ago. I have included the e-mail for you to peruse as an attachment.

[REDACTED]

It's fairly self-explanatory. I thought it was an official site. I went to the site with a question. The grandson of Abd'ul-Baha answered and I realized it was not the official site. That was my one and only communication with the site and I am a Baha'i in good standing who wants to remain so.

[REDACTED]

Thank you for your understanding in this matter,

[REDACTED]

From: [REDACTED]  
Sent: Monday, August 02, 2004 4:46 AM  
To: Bahá'í World Centre  
Cc: [REDACTED]  
Subject: [REDACTED]

Dear UHJ

I would like to know if this letter was sent by you and if the Address is from you I mean the E-mail number I would be very grateful if you could help me solve this problem for members of the Spiritual Assembly ask me to do this to make sure this letter is not from someone else meaning the Covent breakers

With Loving Greetings [REDACTED]

Note: forwarded message attached.

---

Do you Yahoo!?

Yahoo! Mail - 50x more storage than other providers!

# EXHIBIT 6

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

THE NATIONAL SPIRITUAL ASSEMBLY )  
OF THE BAHÁ'ÍS OF THE UNITED STATES )  
OF AMERICA UNDER THE HEREDITARY )  
GUARDIANSHIP, INC. )

Counter-Defendant, )

Civil Action No. 64 C 1878

v. )

The Honorable Amy J. St Eve

THE NATIONAL SPIRITUAL ASSEMBLY )  
OF THE BAHÁ'ÍS OF THE UNITED STATES )  
OF AMERICA, INC. )

Counterclaimant. )

RESPONDENT PROVISIONAL NATIONAL BAHÁ'Í COUNCIL'S  
RESPONSE TO  
NSA'S REQUEST FOR ADMISSIONS

Respondent Provisional National Bahá'í Council ("PNBC"), by and through its attorneys, hereby responds to the Request for Admissions served upon it by the NSA on February 16, 2007.

RESPONSE TO DEFINITIONS

The PNBC here re-asserts and adopts, as if fully set forth herein, its response and objection to the definitions as set forth in its response to the NSA's Request for Production of Documents.

RESPONSE TO REQUESTS FOR ADMISSION

1. Admit that Franklin Schlatter was a founding member of the Remy Corporation.

Response: Admit.

2. Admit that the Secretary position in the Remy Corporation was an executive leadership position.

Response: Admit, except that the functions of the Secretary were limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

3. Admit that Franklin Schlatter was an officer of the Remy Corporation.

Response: Admit.

4. Admit that the Remy Corporation was the governing body for the followers of Charles Mason Remy as the Second Guardian in the United States.

Response: Admit, except that the Respondent denies the implication that those who recognized Remy as the second Guardian were his "followers," because the Guardian is not the founder of a religion but rather is the spiritual head of the Faith and authorized interpreter of the Holy Text. The believers under the Remy Corporation were at all times followers of Baha'u'llah.

5. Admit that the Remy Corporation was ultimately controlled by the Guardian.

Response: The Respondent admits that Charles Mason Remy had ultimate control over the Remy Corporation, but denies that "the Guardian" necessarily had such control.

6. Admit that the Second International Bahá'í Council had authority over the affairs of the Remy Corporation.

Response: Deny.

7. Admit that the membership of the PNBC includes former members of the Remy Corporation.

Response: Admit.

8. Admit that the membership of the PNBC includes family members of former members of the Remy Corporation.

Response: Admit.

9. Admit that the Secretary position of the National Bureau was an executive leadership position.

Response: Admit, except that the functions of the Secretary were limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

10. Admit that the National Bureau was a predecessor organization to both the Mother Baha'i Council and the Provisional National Baha'i Council.

Response: Admit, except that the National Bureau, unlike Mother Baha'i Councils and National Baha'i Councils, exercised no jurisdictional authority over any Orthodox Baha'i body or individual believers.

11. Admit that the Mother Baha'i Council was a predecessor organization to the Provisional National Baha'i Council.

Response: Deny. They are one and the same entity.

12. Admit that meetings of the Remy Corporation were held at Franklin Schlatter's residence.

Response: Deny.

13. Admit that meetings on behalf of the OBF were held at Franklin Schlatter's residence.

Response: Admit with respect to some, but not all meetings.

14. Admit that the Secretary position of the Mother Baha'i Council was an executive leadership position.

Response: Admit, except that the functions of the Secretary are limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

15. Admit that the Secretary position of the Provisional National Baha'i Council is an executive leadership position.

Response: Admit, except that the functions of the Secretary are limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

16. Admit that Franklin Schlatter was appointed "Hand of the Cause of God" by Joel B. Marangella.

Response: Admit.

17. Admit that the "Hand of the Cause of God" assists the Guardian.

Response: Admit.

18. Admit that Franklin Schlatter as "Hand of the Cause of God" acts on behalf of Joel B. Marangella.

Response: Admit, except only to the extent that Marangella specifically directs Schlatter to act on his behalf.

19. Admit that as "Hand of the Cause of God," Franklin Schlatter derives his authority from Joel B. Marangella.

Response: Deny. The authority of a Hand of the Cause of God is derived from the Will and Testament of `Abdu'l-Bahá.

20. Admit that as "Hand of the Cause of God," Franklin Schlatter is the agent of Joel B. Marangella.

Response: Deny, except to the extent that Marangella might appoint him as agent for specific tasks from time to time. However, under the Will and Testament of Abdu'l-Baha, agency is not one of the duties or spiritual responsibilities of a Hand.

21. Admit that as "Hand of the Cause of God," Franklin Schlatter has authority over the PNBC.

Response: Deny.

22. Admit that as "Hand of the Cause of God," Franklin Schlatter has conducted affairs of the OBF on behalf of Joel B. Marangella.

Response: Admit.

23. Admit that as "Hand of the Cause of God," Franklin Schlatter has entered into contractual obligations on behalf of Joel B. Marangella.

Response: Deny.

24. Admit that after September 9, 2001, Franklin Schlatter has conducted business on behalf of Joel B. Marangella.

Response: Deny. Neither the OBF, Franklin Schlatter, nor Joel B. Marangella conducts business.

25. Admit that Franklin Schlatter is currently "Hand of the Cause of God".

Response: Admit.

26. Admit that Franklin Schlatter's role as Secretary of the Remy Corporation was substantially identical to his role as Secretary for the Mother Baha'i Council.

Response: Deny.

27. Admit that Franklin Schlatter's role as Secretary of the Remy Corporation was substantially identical to his role as Secretary for the PNBC.

Response: Deny.

28. Admit that Joel B. Marangella's instruction to the Roswell Local Council to become the Mother Baha'i Council, was communicated to Franklin Schlatter by Joel B. Marangella.

Response: Admit

29. Admit that Franklin Schlatter was among those responsible for the formation of the Mother Baha'i Council.

Response: Admit

30. Admit that Franklin Schlatter incorporated the Mother Baha'i Council.

Response: Admit that he was one of the incorporators.

31. Admit that Franklin Schlatter was an officer of the Mother Baha'i Council.

Response: Admit

32. Admit that Franklin Schlatter was Secretary of the Mother Baha'i Council.

Response: Admit

33. Admit that Franklin Schlatter incorporated the PNBC.

Response: Admit that he was one of the incorporators.

34. Admit that Franklin Schlatter is an agent of the PNBC.

Response: Deny

35. Admit that Franklin Schlatter has entered into contractual obligations on the behalf of the PNBC.

Response: Admit, although those obligations were limited to such things as making meeting and room arrangements for teaching conferences.

36. Admit that Franklin Schlatter acts on behalf of the PNBC.

Response: Admit, as to when he was a director and officer of the PNBC.

37. Admit that Franklin Schlatter is in active concert or participation with the PNBC.

Response: Admit, as to when he was a director and officer of the PNBC.

38. Admit that Franklin Schlatter has conducted business on behalf of the PNBC.

Response: Deny. Neither the PNBC nor Franklin Schlatter conducts business.

39. Admit that Franklin Schlatter currently serves on the "Review Committee" of the PNBC.

Response: Deny.

40. Admit that Franklin Schlatter, at one time, served on the "Review Committee" of the PNBC.

Response: Deny

41. Admit that Franklin Schlatter is the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

42. Admit that Franklin Schlatter was the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

43. Admit that after September 9, 2001, Franklin Schlatter has recruited new members on behalf of the OBF.

Response: Deny. The OBF does not recruit members, but simply offers information to anyone who inquires.

44. Admit that, after September 9, 2001, Franklin Schlatter has contributed to the advertisement of the OBF.

Response: Admit

45. Admit that Franklin Schlatter currently resides at the address: 3111 Futura Avenue, Roswell, New Mexico 88201.

Response: Admit

46. Admit that Marilyn K. Meyer was appointed "Hand of the Cause of God" by Joel B. Marangella.

Response: Admit.

47. Admit that Marilyn K. Meyer as "Hand of the Cause of God" acts on behalf of Joel B. Marangella.

Response: Admit, except only to the extent that Marangella specifically directs Meyer to act on his behalf.

48. Admit that Marilyn K. Meyer was an officer of the Remy Corporation.

Response: Deny

49. Admit that as "Hand of the Cause of God," Marilyn K. Meyer is the agent of Joel B. Marangella.

Response: Deny, except to the extent that Marangella might appoint him as agent for specific tasks from time to time. However, under the Will and Testament of Abdu'l-Baha, agency is not one of the duties or spiritual responsibilities of a Hand.

50. Admit that as "Hand of the Cause of God," Marilyn K. Meyer has authority over the PNBC.

Response: Deny.

51. Admit that as "Hand of the Cause of God," Marilyn K. Meyer has conducted affairs of the OBF on behalf of Joel B. Marangella.

Response: Deny.

52. Admit that as "Hand of the Cause of God," Marilyn K. Meyer has entered into contractual obligations on behalf of Joel B. Marangella.

Response: Deny.

53. Admit that after September 9, 2001, Marilyn K. Meyer has conducted business on behalf of Joel B. Marangella.

Response: Deny. Neither the OBF, Marilyn K. Meyer, nor Joel B. Marangella conducts business.

54. Admit that Marilyn K. Meyer was among those responsible for the formation of the Mother Baha'i Council.

Response: Deny.

55. Admit that Marilyn K. Meyer incorporated the Mother Baha'i Council.

Response: Deny.

56. Admit that Marilyn K. Meyer was an officer of the Mother Baha'i Council.

Response: Admit, but only after the entity changed its name to Provisional National Baha'i Council.

57. Admit that Marilyn K. Meyer was active in the Mother Bahail [Sic] Council.

Response: Admit, but only after the entity changed its name to Provisional National Baha'i Council.

58. Admit that Marilyn K. Meyer incorporated the PNBC.

Response: Deny.

59. Admit that Marilyn K. Meyer currently serves on the "Review Committee" of the PNBC.

Response: Deny.

60. Admit that Marilyn K. Meyer, at one time, served on the "Review Committee" of the PNBC.

Response: Deny.

61. Admit that Marilyn K. Meyer is the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

62. Admit that Marilyn K. Meyer was the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

63. Admit that after September 9, 2001, Marilyn K. Meyer has recruited new members on behalf of the OBF.

Response: Deny. The OBF does not recruit members, but simply offers information to anyone who inquires.

64. Admit that, after September 9, 2001, Marilyn K. Meyer has contributed to the advertisement of the OBF.

Response: Admit

65. Admit that meetings of the Remy Corporation were held at Marilyn Meyer's residence.

Response: Admit that Bahá'í meetings were held (as the believers met in each other's homes), but deny that meetings of the National Spiritual Assembly or any Local Spiritual Assembly were held at the Meyer residence.

66. Admit that meetings on behalf of the OBF were held at Marilyn Meyer's residence.

Response: Admit that, on occasion, meetings were held at the Meyer residence.

67. Admit that James Meyer was appointed "Hand of the Cause of God" by Joel B. Marangella.

Response: Deny

68. Admit that James Meyer as "Hand of the Cause of God" acts on behalf of Joel B. Marangella.

Response: Deny.

69. Admit that James Meyer derives his authority from Joel B. Marangella.

Response: Deny

70. Admit that as "Hand of the Cause of God," James Meyer has conducted affairs of the OBF on behalf of Joel B. Marangella.

Response: Deny.

71. Admit that as "Hand of the Cause of God," James Meyer has entered into contractual obligations on behalf of Joel B. Marangella.

Response: Deny.

72. Admit that after September 9, 2001, James Meyer has conducted business on behalf of Joel B. Marangella.

Response: Deny.

73. Admit that James Meyer is currently "Hand of the Cause of God."

Response: Deny.

74. Admit that James Meyer was among those responsible for the formation of the Mother Baha'i Council.

Response: Deny.

75. Admit that James Meyer incorporated the Mother Baha'i Council.

Response: Deny.

76. Admit that James Meyer was an officer of the Mother Baha'i Council.

Response: Deny.

77. Admit that James Meyer incorporated the PNBC.

Response: Deny.

78. Admit that James Meyer currently serves on the "Review Committee" of the PNBC.

Response: Deny.

79. Admit that James Meyer, at one time, served on the "Review Committee" of the PNBC.

Response: Deny.

80. Admit that James Meyer is the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

81. Admit that James Meyer was the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

82. Admit that Charles Mason Remey is the "successor" to which the following