EXHIBIT S

1 MONTANA FOURTH JUDICIAL DISTRICT COURT
MISSOULA COUNTY
2
3 THE SECOND INTERNATIONAL BAHA'I COUNCIL [sic],)
4 Plaintiffs,)
5 -vs-) Cause No. DV-02-410
6 NEAL CHASE,)
7 Defendant.)
8

COPY

9 Taken at 202 W. Spruce Street
10 Missoula, Montana
Tuesday, March 18, 2003 - 9:20 a.m.
11
12 D E P O S I T I O N
OF
13 CARLOTTA GEESEN
14
15 A P P E A R A N C E S
16
MICHAEL SOL, Esq., of Sol & Wolfe Law Firm, 100
17 Montana Building, 101 E. Broadway, Missoula,
Montana 59802,
18 appearing on behalf of the Plaintiffs,
19 CYNTHIA K. SMITH, Esq., of The Smith Law Offices,
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20 Montana 59807-7785,
appearing on behalf of the Defendant.
21
Also present: Neal Chase
22
23
Reported by Kerry Fremerman, RPR, 1015 Mount
24 Avenue, Suite C, Missoula, Montana 59801, Phone
(406) 721-1143, Freelance Court Reporter for the
25 State of Montana, residing in Missoula, Montana.

1 **Q. Now I'd like you to give a little bit**
2 **of the history of the SIBC for me, if you would.**
3 **Tell me what SIBC means.**
4 A. SIBC means Second International Baha'i
5 Council. This obviously indicates that there was
6 a First Internatinal Baha'i Council. The First
7 International Baha'i Council was established by
8 Shoghi Effendi, who in 1951 --
9 **Q. And feel free to refer to anything that**
10 **helps you.**
11 A. In 1951, Shoghi Effendi, who was the
12 guardian of the Baha'i faith at that time -- he
13 was an inherited position -- set up the First
14 Internatinal Baha'i Council. He didn't designate
15 it as first. It was simply the International
16 Baha'i Council. And he appointed certain
17 individuals to this.
18 The purpose of this International
19 Baha'i Council was that as the faith evolved
20 and -- unfolded and evolved, different
21 administrative bodies would be established. And
22 the International Baha'i Council would evolve
23 into the Universal House of Justice. The
24 Universal House of Justice had to be an elected
25 body. But the president of the Universal House

1 of Justice was not an elected position. That was
2 an inherited or appointed position. And due to
3 the fact that this individual was the guardian of
4 the Baha'i faith, the guardian of the Baha'i
5 faith is the Davidic Kingship.
6 So when Shoghi Effendi appointed these
7 individuals to the International Baha'i Council,
8 the intent was that it would evolve. When the
9 Universal House of justice was elected, then the
10 person that Shoghi Effendi had named as the
11 president of the International Baha'i Council
12 would take his position as the president of the
13 Universal House of justice. He named Mason Remey
14 as the president of the International Baha'i
15 Council.
16 There was -- after Shoghi Effendi's
17 death, there was a major violation in the faith,
18 and the majority of the believers broke off and
19 established their own group and usurped -- took
20 authority and usurped the powers and authority of
21 the guardianship and determined that there would
22 not be any more guardians.
23 Mason Remey, of course, who knew that
24 he was the guardian, did not go with this
25 mainstream group and continued on in his role as

1 the guardian, but obviously not in the capacity
2 as the president. The UHJ was not elected at
3 that time due to the fact that before there could
4 be an election of the Universal House of Justice,
5 there has to be Baha'is in every country of the
6 world, it's universal. So there would have to be
7 local councils and national councils. And, you
8 know, in order for the UHJ to be established,
9 there would have to be universal elections of all
10 the believers, representing all parts of the
11 world, who would choose who the members of the
12 Universal House of Justice would be.
13 So Mason Remey had his own group of
14 believers, and Dr. Jensen was one of those
15 individuals who followed -- who remained firm in
16 the Covenant, followed Mason Remey, and later
17 came to realize that he himself had a station,
18 was prophesied in the bible, and that his role
19 was to be the establisher of the Baha'i faith,
20 and he was to reestablish what the
21 Covenant-breaking Baha'is had thrown out after
22 Shoghi Effendi passed way.
23 Dr. Jensen, in his mission to
24 reestablish the Baha'i faith, reestablished the
25 International Baha'i Council in January 1991, and

1 publicly acknowledging or accepting it, he did
2 not.
3 **Q. When you've been talking just now you**
4 **kept saying "we believe." When you say that,**
5 **who's "we"?**
6 A. When I say "we," I'm referring to those
7 individuals who are firm in the Covenant, who
8 accept the remaining members of the Second
9 International Baha'i Council as the true body,
10 who continue to adhere to what Dr. Jensen
11 established. So I refer to myself, the other
12 board members, and the other Baha'is under the
13 provisions of the Covenant who remain firm under
14 the Second Internatinal Baha'i Council.
15 **Q. So let me break that down just so I**
16 **understand where you're coming from.**
17 **So the Baha'is under the provisions of**
18 **the Covenant is what?**
19 A. They are individuals who obviously
20 accept Baha'u'llah, 'Abdu'l-Baha, Shoghi Effendi,
21 Mason Remey, Joseph Pepe Remey, Dr. Leland
22 Jensen, and the Second International Baha'i
23 Council, being that body that I represent here
24 today, not any other group who claims to be the
25 Second Internatinal Baha'i Council.

1 **Q. And that's who you refer to as Baha'is**
2 **under the provisions of the Covenant? -**
3 A. That's right.
4 **Q. Is it fair to say the Baha'is under the**
5 **provisions of the Covenant are the group that**
6 **broke away from the Hands?**
7 A. No.
8 **Q. So --**
9 A. Well, those individuals who broke away
10 from the Hands were indeed Baha'is under the
11 provisions of the Covenant. They followed Mason
12 Remey, Shoghi Effendi, 'Abdu'l-Baha, Baha'u'llah.
13 But at that point Dr. Jensen's mission was not
14 known and, of course, Mason was alive so they
15 didn't accept Pepe.
16 At that point, yes, they definitely
17 were under the provisions of the Covenant. The
18 name Baha'is under the provisions of the Covenant
19 wasn't the name used at that time. Mason Remey
20 referred to them as -- at one point he referred
21 to them as the orthodox Baha'is, I believe. So
22 the name Baha'is under the provisions of the
23 Covenant came about at a later time.
24 So, in essence, they were under the
25 provisions, do you understand what I'm saying,

1 but they weren't known as that name.
2 Q. But the people who are known as Baha'is
3 under the provisions of the Covenant are the
4 group of individuals who have followed Dr. Jensen
5 forward. Would that be fair to say?
6 A. Yes.
7 Q. And can you explain Dr. Jensen's role
8 as a member of the Baha'is under the provisions
9 of the Covenant. Maybe I'll just ask you some
10 questions and you can tell me if I understand it
11 correctly.
12 It's my understanding that Dr. Jensen
13 is called the Lamb?
14 A. That's correct.
15 Q. And as the Lamb, he is the person who
16 was prophesied by what?
17 A. In the scriptures.
18 Q. And by that you mean the bible?
19 A. Yes, ma'am.
20 Q. Anything else?
21 A. There's Baha'i writings. In Some
22 Answered Questions as 'Abdu'l-Baha talks about
23 that distinguished individual who would arise --
24 I'm sorry, I can't tell you the page.
25 Q. Sure. And I wouldn't expect you to.

1 A. I don't have that personally. Don't
2 have that ability to tell you pages and then
3 paragraphs, and I'm not an individual who can
4 memorize. I've never tried to and had never
5 accomplished memorizing the bible versus chapters
6 and writings.
7 **Q. And I would not expect you to. I**
8 **apologize for interrupting you. I'm just trying**
9 **to make a clear record of who's who and what's**
10 **what.**
11 A. That's fine.
12 **Q. But Dr. Jensen was a very important**
13 **part of your -- I guess I want to use the right**
14 **word to describe what the SIBC is. I mean if I**
15 **say organization --**
16 A. That's fine.
17 **Q. That's a term we can both use?**
18 A. That's fine.
19 **Q. So Dr. Jensen was a very important part**
20 **of your organization?**
21 A. Absolutely.
22 **Q. And would you consider him an**
23 **authoritative person?**
24 A. Absolutely.
25 **Q. So Dr. Jensen was the establisher,**

1 **that's how he's referred to?**
2 A. Yes.
3 **Q. What does that mean?**
4 A. The establisher of the Baha'i faith,
5 meaning that when there was the great violation
6 after Shoghi Effendi's death, and the Hands
7 decided that God had changed his mind, there
8 wouldn't be any more guardians. They used as
9 proof of that Shoghi Effendi had left no will
10 naming a guardian, and that Shoghi Effendi had no
11 son. So they dissolved the guardianship.
12 The Hands of the faith at that time
13 were individuals that Shoghi Effendi had
14 appointed to help him carry out the work that he
15 was doing. Some of these Hands had also been
16 appointed by Shoghi Effendi on the International
17 Baha'i Council. And I should point out that the
18 International Baha'i Council, though it was an
19 organization Shoghi Effendi established that
20 obviously did have a purpose, was never
21 activated. It never began to function as an
22 organization. And so we often refer to the
23 International Baha'i Council as the Embryonic
24 International Baha'i Council because it existed.
25 It was there. But it never actually functioned,

1 you know.
2 Dr. Jensen as the establisher of the
3 Baha'i faith who came in the greater Covenant of
4 God, meaning that he was prophesied in the
5 scriptures, different religious scriptures. Not
6 just the bible, but other religious scriptures as
7 well. As well as in the Baha'i writings there
8 are prophesies about him. And his mission as the
9 establisher was to bring back or replace what the
10 violators, the Covenant-breaking violators had
11 destroyed to show -- to reestablish in the world
12 the Davidic Kingship. That without the Davidic
13 Kingship, you know, there is a -- how do I say
14 this? That the Baha'i faith without a Davidic
15 king as its head is not the true religion of God.
16 **Q. So tell me what the Davidic Kingship**
17 **is.**
18 A. The Davidic Kingship is a line of male
19 sperm descendents going all the way back to
20 Abraham. In the bible God promises King David
21 that he will rule on the throne of God forever.
22 And this is through the Davidic Kingship. We
23 believe that God doesn't break his promises, and
24 that there's always been a Davidic King in the
25 world, even when the Jews were placed in exile,

1 that there was still a Davidic King, that this
2 lineage never went away, was never dissolved, was
3 never broken, and that it exists to this very
4 day.
5 **Q. So the Davidic Kingship, as I**
6 **understand it, is the same thing as the guardian,**
7 **that the guardian --**
8 A. So this individual who is the Davidic
9 king, who is that person who is that Davidic
10 king, his role or his title in the Baha'i faith
11 is referred to as the guardian. He is the
12 guardian of the Baha'i faith. That individual's
13 title also would be president because that
14 individual would be the president of the
15 Universal House of Justice.
16 **Q. And so there's only one guardian at a**
17 **time?**
18 A. Yes.
19 **Q. But that person can be an adopted son,**
20 **which is the branch?**
21 A. Yes.
22 **Q. It's the branch back into the lineal**
23 **line of birth descendents?**
24 A. Yes.
25 **Q. So the SIBC -- Second International**

1 **Baha'i Council, is that correct?**
2 A. Yes.
3 **Q. -- was established by Dr. Jensen?**
4 A. Yes.
5 **Q. In what year?**
6 A. January 1991.
7 **Q. I'm sorry, I wasn't trying to test you.**
8 **I'm just trying to put it all into context. And**
9 **the SIBC is what? I mean who makes up the SIBC?**
10 A. The members whose names I gave you
11 earlier are those individuals who make up the
12 SIBC.
13 **Q. And those are?**
14 A. Chris Mullally, Robert Konczyk, LaVonne
15 Howell, Dawn Chase, Matt Roeser, John Geesen,
16 Annette Konczyk, Ray Armstrong and Carlotta
17 Geesen.
18 **Q. Bob Solem.**
19 A. And Bob Solem, thank you.
20 **Q. Have they always been the SIBC?**
21 A. Yes.
22 **Q. From 1991?**
23 A. Some of them were not appointed in
24 1991. You know, Dr. Jensen established the
25 Second Internatinal Baha'i Council in January,

1 individual being suspected of Covenant-breaking
2 to come before the Body and have the opportunity
3 to spread their Covenant-breaking poison amongst
4 the members of the Body.
5 **Q. At the time of Mason Remey, there was a**
6 **split between the Hands and Mason Remey**
7 **supporters, correct?**
8 A. Yes.
9 **Q. How would a believer know who was the**
10 **true International Baha'i Council?**
11 A. They had to choose. They had to accept
12 the arguments that Mason put forth as to why he
13 was the correct or true Baha'i faith or they had
14 to choose what the Hands claimed or based their
15 claim that they were the correct Baha'i faith.
16 **Q. But how do we know what was the correct**
17 **Baha'i faith?**
18 A. The believers had to individually
19 choose for themselves, which would be correct. I
20 know as an individual, and I know as a member of
21 the SIBC, that Mason Remey's group was the
22 correct group because Mason had the proof that he
23 was the guardian of the Baha'i faith.
24 **Q. Who picks the Hands of the Cause of**
25 **God?**