

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

THE CHURCH OF THE HOLY LIGHT
OF THE QUEEN, a/k/a The Santo
Daime Church, et al.,

Plaintiffs,

vs.

CASE NO. 08-3095-PA

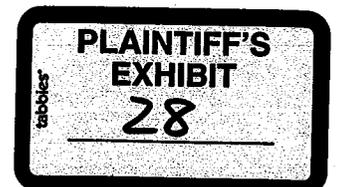
MICHAEL B. MUKASEY, et al.,

Defendants.

_____ /

DEPOSITION OF JONATHAN GOLDMAN

BE IT REMEMBERED THAT, pursuant to Notice of
Taking Deposition, the deposition of JONATHAN
GOLDMAN was taken on behalf of the Defendants,
before Melanie J. Savord, Certified Shorthand
Reporter, State of Oregon, on Friday, October 3,
2008, beginning at the hour of 9:35 a.m., at the
offices of Advanced Court Reporting, 336 West Sixth
Street, in the City of Medford, County of Jackson,
State of Oregon.



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APPEARANCES

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1 Q Do you refer to the people that come to you as
2 patients?

3 A I refer to them these days as clients.

4 Q Has any client that came to you for any of the
5 services you described ever subsequently visited the CHLQ?

6 A Very rarely. There may, yes. Yes. Yes.

7 Q Have any of your clients ever become CHLQ
8 members or initiates?

9 A Yes.

10 Q What percentage would you estimate of the CHLQ
11 initiates?

12 A Were clients of me?

13 Q Yes.

14 A You will have to give me a moment to think.

15 Q Sure.

16 A Two percent maybe. I'm trying to transfer like
17 numbers into -- maybe two. Two percent, three percent.

18 Q What's the total number of members that you are
19 referring to? How many total members?

20 A At this point 40, more or less. We are talking
21 about two people out of 40 is what I'm saying. I don't --
22 I don't know what that translates as.

23 Q How many former members are there?

24 A In that category?

25 Q No. How many former members of the CHLQ?

1 A All together former members I have to say
2 another 40. I have to say another 40.

3 Q Do you proselytize?

4 A Not a bit. Never.

5 Q But you don't advertise the CHLQ in any way
6 either, do you?

7 A None. Nothing.

8 Q So how do people find out about the CHLQ?

9 A People find out -- it's an interesting question
10 because people find out generally from word of mouth but
11 not word of mouth as in proselytizing. But people will
12 be -- for instance, what happens generally when someone
13 begins to come to services is they themselves begin to
14 change a lot and it becomes obvious to people that are
15 close to them. Our way and the way we encourage our
16 members is people don't go and then, how do you say, begin
17 talking to other people. They wait and people in their
18 circle of friends will say eventually okay, what's going
19 on? Something is changing, new. And we actually counsel
20 people to have a step-by-step, very careful conversation.

21 So what I tell people, for instance, is there
22 may be 10 people who are going to express an initial
23 curiosity about what's going on with you because they know
24 you. Out of those 10, there may be one person who really
25 wants to have a serious conversation. And so then sit

1 Q Do you think the government should have the
2 authority to regulate controlled substances?

3 A Certainly.

4 Q Are you familiar with the Controlled Substances
5 Act?

6 A I'm familiar with it. Not intimately familiar,
7 but I'm familiar with it, sure.

8 Q Are you aware that ayahuasca and the Daime tea
9 contain DMT?

10 A Yes.

11 Q Are you aware that that's a Schedule 1
12 controlled substance?

13 A The DMT is not Daime and ayahuasca. But the
14 DMT -- is that what you are asking?

15 Q Yes.

16 A Yes, certainly.

17 Q Do you believe that DMT should be a Schedule 1
18 controlled substance?

19 A I don't feel qualified to answer that question.

20 Q Do you -- why not?

21 A I'm not a scientist. I'm not a -- I'm not a
22 drug expert. It's not my expertise. You know what I
23 mean? I don't feel like I can truthfully give the reason
24 because I know that the process of something getting to
25 that category is a long and complicated process, and I'm

1 just not -- it's not my profession.

2 Q Do you think that all substances that contain
3 any DMT should be a Schedule 1 controlled substance?

4 A That's a -- I think -- no. No, because we are
5 talking about in this case a sacrament, a sacrament of a
6 religion which falls in a different category. We are not
7 talking about a drug. The Daime is not a drug. The Daime
8 is a sacrament. So you start comparing -- you are
9 comparing apples and oranges in my view. There's a
10 special category of sacramental herbs, sacramental plants
11 that is its own -- its own category, its own consideration
12 as I think the right word I would use.

13 Q Are there any other substances other than the
14 Daime tea that you think belong in that same category of
15 substances that are used for sacramental purposes and
16 shouldn't be Schedule 1 substances?

17 A Peyote. Peyote already fits into that category,
18 right? I think it's the -- what would you call it? The
19 flag bearer of that category. The precedent that I'm
20 talking about -- about a special category, special
21 designation, special consideration already has been given
22 to peyote. So that's the only one that I know about.

23 Q Other than -- other than the Daime tea and any
24 others that you might regard as sacraments, do you think
25 that substances that contain DMT should be Schedule 1

1 A Under that, those have locations in various
2 places. They are all under that church authority. And
3 then there's various designations within those
4 configurations of churches, centers and points as more
5 intermediary authority, right? So you have at the top --
6 the padrinho is an honorific that actually means
7 godfather. Comes out of the Amazonian culture which
8 actually comes from the European-Portuguese culture. It's
9 an honorific given to a respected elder. Under him are
10 the counselors of the Cefluris. That is the name of the
11 civil organization. Under those are the authorities, the
12 people given authority over those various points, centers
13 and churches.

14 And then within those points and churches
15 there's also a hierarchical of churches that are
16 responsible for the centers and points.

17 Q What branches of the Santo Daime Church are the
18 plaintiffs in this litigation?

19 A What branches?

20 Q Yes.

21 A In that configuration that I'm talking about?

22 Q Yes.

23 A In Ashland we are what is called a church, a
24 full church. And then the Bend, Oregon and Portland,
25 Oregon are centers. Called centers -- each of them.

1 potential reason for denying somebody participation in a
2 ceremony. Are you aware of any examples when anybody
3 under 18 participated in a ceremony?

4 A Ever anywhere?

5 Q In Oregon.

6 A Yes.

7 Q How many examples can you think of?

8 A I can think of three.

9 Q And do you know the age of the individuals?

10 A Fifteen, 17. Fifteen. Two 15, one 17.

11 Q Why were they allowed to participate?

12 A They were the children of Brazilians who had
13 participated many times in Brazil.

14 Q Each of those three people were?

15 A Yeah.

16 Q Can you think of any examples where people were
17 not children of Brazilians?

18 A Actually I can. I can think of two other
19 examples, and they were children who had drunk in Brazil,
20 but their parents are Americans. And they were given --
21 people of that age are given what we call a ceremonial or
22 a symbolic amount, right? I don't know if you understand
23 the distinction. But because we serve Daime so much, we
24 know what is a ceremonial -- ceremonial dose is symbolic.
25 In other words, it's not going to have an effect; any kind

1 of discernible, altering affect on the person. We give
2 them, right, a small amount.

3 Q Can you estimate what that amount is?

4 A I can show you on this glass.

5 Q Can you estimate in some way that can be
6 recorded by the court reporter?

7 MR. HABER: Go off the record for a second.

8 THE WITNESS: Teaspoon.

9 MR. BEANE: I would prefer you not.

10 THE WITNESS: I would estimate it would be a
11 teaspoonful.

12 BY MR. BEANE: (Continuing)

13 Q One serving during the whole ceremony of a
14 teaspoon?

15 A Could be two of a teaspoon each.

16 Q Okay.

17 A And so, you know, when I say that, it could be
18 half a teaspoon, could be a teaspoon and a half. It
19 depends on the person, the size of the person. There are
20 many variables. But it would be -- it would be designed
21 specifically to not invoke an altered state.

22 Q And then can you think of any other examples of
23 reasons that you wouldn't allow a person to participate
24 other than the ones you mentioned?

25 A There may be, but I can't now think of any.

1 people have decided that they didn't -- they just didn't
2 want to -- they didn't want to be there. That they had --
3 were not happy with the decision they had made to come.
4 And we just ask them to wait and very kindly take the
5 time. We don't restrain anybody; we never, never had to
6 do that. People are tired or -- I don't know. I can't
7 remember the specifics.

8 Q But none of those instances was somebody
9 permitted to leave or none of those situations did
10 somebody ultimately leave before the ceremony was over?

11 A No, no. Guardians are trained to be generally
12 but firmly persuasive.

13 Q Does anybody ever become paranoid after
14 consuming the Daime?

15 A No. I can't think of an instance. Paranoid,
16 no.

17 Q Have there been any instances when somebody
18 required medical treatment?

19 A No. No, never.

20 Q Have you ever had an unpleasant experience?

21 A Myself?

22 Q Yes.

23 A Many times I have had experiences that I -- in
24 the moment were very unpleasant.

25 Q I asked that question a little imprecisely. I'm

1 BY MR. BEANE: (Continuing)

2 Q From your perspective, is participation in the
3 Santo Daime Church beneficial for past or present drug
4 users?

5 A I would say the same answer. Many people who
6 are caught in that spiral of drugs are caught in lots of
7 darkness. It's not about the use of drugs. It's about
8 what goes along with it.

9 Q Is any -- is any type of illegal drug use
10 disqualifying at this point? In other words, would you
11 prohibit somebody from participating in a ceremony?

12 A Yeah. People who are actively using illegal
13 drugs -- it's not going to be a benefit for them, not
14 going to help them.

15 Q Do you think that the participation in Daime
16 ceremonies would be helpful to former drug users?

17 A Yes. Depends on the person. Again, as a
18 category I can't say yes. As a particular and certainly
19 the many experiences -- many, many experiences of -- let
20 me say it this way: The man who was the predecessor -- I
21 refer to Padrinho Alfredo who is the leader. His father
22 was a very special man who was truly a saint early on.
23 His name was Sebastian. He said -- at one point he took
24 his people to the jungle, right? These people lived in
25 Rio Bronco which is the main city in the Amazon. And when

1 whether it was done in written form I don't know. I don't
2 know the form that it was transmitted. This came out
3 of -- this was a codification of things that we were
4 saying to people. I don't have the information as to
5 whether it came out of other material or not.

6 Q But your recollection is that whether it was
7 written or in an earlier document, all potential
8 participants were in receipt of this information?

9 A Always. For sure.

10 Q Other than spiritual or religious benefits, are
11 there any other benefits in your opinion from consumption
12 of the Santo Daime tea?

13 A Yeah. There are spiritual, religious benefits.
14 There are also day-to-day life benefits. And I say this
15 from observation, right, from my own life and observation.
16 My own family is -- my children -- nothing about my
17 children drinking tea. But I'm talking about the ambiance
18 of our family is a place of peace and harmony and love and
19 support. I can guarantee that kind of from my wife and my
20 participation in the Daime. In general that is a
21 well-known observation.

22 Families are harmonized we say from our point of
23 view because we are talking about a consciousness. We say
24 the Daime likes harmony. We say the Daime likes harmony
25 because we say we are dealing with a consciousness, an

1 intelligence, not a tea. There's an active intelligence
2 contained in the tea. Daime likes harmony. So people's
3 lives become harmonious.

4 People's lives go through changes; people often
5 come to the Daime and change their work because they
6 realize as they begin to heal and they begin to become
7 more harmonious in themselves that the work they are doing
8 doesn't match that, and they find it quite difficult
9 sometimes to keep doing it. But the Daime also teaches us
10 to work so people don't become idle and don't become --
11 what do you call it? Dependent. They work actually
12 harder. Tend to be people come who have had trouble
13 finding work, and they end up working.

14 So there's a social benefit not only to the
15 person but to the society that's very well observable.
16 Let me put it that way. People take better care of
17 themselves, right? So I would never make a claim that the
18 Daime itself makes people healthier, but people become
19 healthier. So habits that people have. People don't
20 necessarily stop drinking coffee or whatever, but they
21 drink less, tend to change their diet to a more healthy
22 one for them. Not because we tell them to; because
23 organically they feel that they want to become more
24 healthy. It's very clear observation.

25 You have in Dr. Halpern's report the beginnings

1 of the -- a small but significant observation that people
2 come who are addicted to various substances and various
3 activities. And not everybody -- Daime is not a panacea.
4 But in general very observable -- statistical by his
5 estimation -- observation people become less committed to
6 those addictions. Very clear observation. People
7 drinking more alcohol than is good for them -- not that
8 they necessarily stop, but they decrease the amount.
9 People who are engaging in activities -- these days people
10 are addicted to different kinds of activities that they
11 are doing. Tend to -- not everybody. But tend to stop
12 that or bring it more into a balance.

13 MR. MARMADUKE: How about chocolate chip
14 cookies?

15 THE WITNESS: Chocolate chip cookies are
16 something that we encourage people.

17 MR. HABER: She's writing this down.

18 THE WITNESS: They come to my house; she makes a
19 really good chocolate chip cookie. There was one other
20 thing I was going to say. See, the Daime also -- there's
21 what in the Daime we call the doctrine of the Daime. It's
22 not just the experience of drinking the tea. The Daime
23 doctrine, which is different than other religion
24 doctrine -- most are a list of rules. You must do this,
25 and this is what God teaches. It's not the Daime.

1 The doctrine of the Daimé we experience is what
2 I call an active living matrix of consciousness. It's a
3 teaching but it's a teaching that comes from the inner
4 experience. Then the teachings then are transmitted in
5 the songs what we call hymns. It's a very beautiful
6 system. So there's no written, so to speak, catechism.
7 There's not a list of precepts of religion. It's
8 contained in the hymns which are poetry which are open to
9 a lot of experiential -- not so much experiential.
10 Understanding.

11 And there are certain precepts, certain things
12 come through again and again and again. Respect; respect
13 for one's self, respect for one's family, for each other,
14 respect for your brothers and sisters, respect for elders,
15 respect for nature. Harmony, right? Live in harmony.
16 What does that mean? So each one interprets that. If you
17 are living in the middle of the Amazon forest, it means
18 one thing. If you are living in the middle of Washington
19 D.C., harmony means another thing. Little more
20 challenging to find. But it teaches us that. So find
21 respect, harmony, be truthful.

22 I have people come to me quite often and confess
23 but not because I'm a priest. But they need to tell
24 somebody, I have been living a lie, I have been doing
25 this, I have been cheating on my wife, I have been doing

1 whatever. Respect, truth, justice. Do justice, expect
2 justice, right? Do justice with each other. Be just. So
3 that's just a study. It's what you guys do; bring
4 justice. Be a just person. Forgive, right? Don't seek
5 vengeance, seek forgiveness. Another one in this culture
6 difficult to find.

7 So people who come to the Daime study that every
8 time you drink Daime. So when you talk about a difficult
9 time, so yeah, when I have a lack of forgiveness in me,
10 the Daime shows me that; I see it.

11 So the study, the evolution of being a spiritual
12 person, is that study of forgiveness. But it's not here's
13 how do you this. It's like okay, you claim you want to be
14 a Christian; you claim you want to be somebody who
15 embodies these teachings. Look at yourself. So the
16 process of that; just the process of self-examination
17 changes a person. So people become more open-hearted,
18 more -- and simultaneously because it's a path of work,
19 more grounded.

20 So people -- this is not a -- we had a phrase in
21 the '60s, bliss. There is not people that just sit around
22 being spiritual people with spiritualizing their lives.
23 Does not mean to live 21st Century America. It's a heck
24 of a study. It's pretty self-limiting, but the people who
25 make that study transform themselves; become better

1 covers it pretty well. There's a whole section here
2 that -- breathe, surrender, positive thoughts, align,
3 ground yourself, pray. That's pretty much it. I think it
4 says in here if you have any questions, ask the guardians,
5 rely on the guardians, do what guardian tells you. Very
6 important. Guardian tells us to do something, do it. I
7 don't know if that's covered in there but that's certainly
8 something we tell people.

9 Q Are you aware of any incidents of adverse
10 effects from the consumption of Santo Daime tea?

11 A Nothing that I would call adverse, right? There
12 are many instances what I said people vomit or people
13 going through what in the moment is a difficulty. But
14 adverse in the sense of detrimental to them in some kind
15 of observable, long-term way, no.

16 Q Any other physical effects other than the
17 purging and the emotional response that you described?

18 A Emotional response. Shaking. I mentioned
19 crying and release. There are instances where people have
20 fainted. Numbers of times. Some people have fainted
21 numbers of times. But there's number of instances for
22 sure. Sometimes people can be very -- can feel very deep
23 fatigue and inability to sit up. I'm talking about people
24 can just feel also that they really need to lie down; they
25 can't maintain themselves. They are given a place to lie

1 down. That's about it.

2 Q Are you aware of any incidents where people
3 became temporarily unconscious?

4 A I just said sometimes people pass out. Last
5 very quick; five seconds, 10 seconds. Then they come --
6 they come back. But there's no instance of people who
7 pass out and stay that way.

8 Q So the longest period that you are aware of is
9 five seconds or sometimes longer?

10 A Ten seconds.

11 Q Are there any incidents when somebody required
12 medical treatment after a consumption of the Santo Daime
13 tea that you are aware?

14 A Not that I'm aware of. Like I say, in thousands
15 of rituals I have no awareness anywhere in the world of
16 that ever happening.

17 Q You referred earlier to the 2008 Halpern study.

18 A Uh-huh.

19 Q Are you aware of any other studies of the use of
20 Santo Daime tea by members of the United States?

21 A No, I'm not aware. I'm not aware of another
22 study. Of that level anyway I'm not aware of at all.

23 Q Are you aware of any other studies of Santo
24 Daime use more broadly anywhere in the world?

25 A It would be something that Roy would know way

1 more than me about that. I'm not aware. I know that
2 there have been studies done, but I'm not aware of any
3 such as Dr. Halpern, a study of participants in the Santo
4 Daime. There may be; I'm not aware.

5 Q I'm going to ask you a similar series of
6 questions but more broadly about ayahuasca use generally.

7 A Can I pee first?

8 Q Sure. We can take a break.

9 (Recess.)

10 BY MR. BEANE: (Continuing)

11 Q Before we broke, I started to say that I was
12 going to ask a similar series of questions and ask about
13 ayahuasca use and not just about Santo Daime tea.

14 A Okay.

15 Q When this series of questions -- when I say
16 ayahuasca, I intend that to apply to Santo Daime tea as
17 well to hoasca or any other tea that may be known by a
18 different name. I'm just asking in the broadest sense of
19 all the same components that are in the ayahuasca.

20 A Okay. I will do the best I can to answer.

21 Q Are you aware of any -- of any adverse effects
22 of ayahuasca consumption anywhere in the world?

23 A Okay. Here's the problem is that there's one
24 incident -- there's one incident in Canada that was not --
25 had nothing to do with Santo Daime, nothing to do with

1 UDV. It was a case -- a native woman in BC, I think, who
2 had what appeared to be an adverse reaction. The reason
3 I'm hedging it was never quite proven that it was from the
4 ayahuasca. She was a woman who was very ill and had --
5 she ended up dying. But it was never proven it was by
6 ayahuasca. That's all I know of. It was a case that was
7 resolved but it had nothing to do with ayahuasca or Santo
8 Daime.

9 MR. HABER: Off the record.

10 (Discussion off the record.)

11 MR. BEANE: Let's go back on the record.

12 THE WITNESS: So I will clarify. So let me then
13 say that on the record. Ayahuasca, right, is a generic
14 term that has simply become a generic term. In other
15 words, there's no central authority that designates these
16 things. Ayahuasca is simply an Indian term from South
17 America that has become in common usage to designate this
18 broad range of concoctions I think they call it.

19 But ayahuasca -- so hoasca which is used -- in
20 Daime we use only two plants. That's all. It's made out
21 of plants and water. The two plants are -- slight
22 variations on the two. The vine which we call jagube --
23 we call it something else. We call the leaf the queen.
24 Ayahuasca has some of those -- usually has some variation
25 of those components but then they put other things in it.

1 evidence that says there is, in effect, any risk to
2 someone pregnant. I'm not aware of any studies that show
3 this. It's also not my experience or my observation that
4 there is a particular risk to anybody who's pregnant. We
5 have lot of anecdotal experience in Brazil. Many women --
6 there are adjustments that one would make that drink less
7 and late in pregnancy though don't go to work because it's
8 just too uncomfortable. As I said earlier, I have never
9 in this country -- because of the circumstances we are in,
10 I don't have any knowledge of anybody coming who has never
11 drunk Daime who was -- knew they were pregnant. I don't
12 think that's ever happened as far as I know.

13 So the situation has never presented itself to
14 give a warning. I wouldn't give a warning to somebody who
15 was not pregnant, and I don't feel that there's a
16 necessary warning to have. I also cannot think of -- and
17 there may be, but I can't think of any instances where
18 somebody came and discovered they had been pregnant. I
19 don't have knowledge of any such instance.

20 Q Do you ever advise participants about a risk to
21 children from consuming the Santo Daime tea?

22 A No. First of all, again, I don't think there is
23 a risk to children. When -- I don't think there's a risk.
24 As I said, in those rare instances when children are
25 given -- it's not so rare in Brazil. But in the very rare

1 instances where it's happened here, there's what I called
2 the ceremonial dose or symbolic amount that's given. In
3 other words, there's no risk to a child if a parent drinks
4 it so why -- there would be no reason to advise someone
5 about that.

6 Q Do you advise participants of a risk if they
7 have a history of stroke?

8 A Well, there are -- again, that would be a
9 situation to refer to a physician. I'm also not aware of
10 any study that would say that that would be the case.
11 That would be a situation where any -- like anybody coming
12 with any kind of medical condition or any kind of history
13 we would monitor them very clearly. And it would be a
14 conversation that the physician would have. That would be
15 an instance where I would say I'm not qualified to make
16 that judgment; you have to talk to the doctor.

17 Q Let's --

18 A There's no risk of someone getting a stroke from
19 drinking Daime. If there's a history of stroke, I would
20 refer them to the doctor.

21 Q Do you advise participants about any risk -- do
22 you advise participants there's a risk if there's a
23 history of substance abuse?

24 A There is no risk. There is no discernable risk
25 to taking Daime if you have a history of substance abuse.

1 Q Do you ever advise people that there's a risk if
2 they have a history of mental health problems or
3 psychiatric issues?

4 A Again, there's no -- here's what I -- there's no
5 specific risk that I know of to someone drinking Daime if
6 they have a history of mental illness. What I would
7 advise people to do and what we do advise people is --
8 referring to the earlier conversation, that people may be
9 faced with seeing the disturbances, to see their own self,
10 to see things about themselves that they may find to be
11 challenging and uncomfortable. And in the case of mental
12 illness, there may be those things. Everybody is advised
13 of that. If somebody has that history, I think -- I know
14 we would take special care to advise someone and give them
15 the -- what do you call it? A framework for understanding
16 it beforehand.

17 Q But you don't advise them that they should not
18 consume Santo Daime tea?

19 A Not necessarily, no. No, not necessarily.

20 Q Are you aware of any system that Cefluris has in
21 place to monitor the effects of Santo Daime use?

22 A That question is too broad for me.

23 Q I'm asking about any health effects, whether
24 physical or psychological.

25 A They have a specific system in place? I'm not

1 all, but I know they know a lot about it.

2 Q Moving on to a new topic. I would like to ask
3 questions about the importation, transportation and
4 storage of the Santo Daime tea.

5 A Okay.

6 Q You gave me a form earlier today which we should
7 probably mark as Exhibit 4. Can you identify that
8 document for the record?

9 (Marked for identification:
10 Deposition Exhibit Number 4.)

11 A This is called a Sacrament Receipt Form and it
12 is a form which is filled out by the person entrusting the
13 tea from Brazil and also by the person receiving the tea
14 to bring it here. It's filled out at the point of
15 receipt.

16 Q Okay. So beginning -- let's start at the
17 beginning of the process. What do you do in order to
18 order another batch of the Santo Daime tea?

19 A There is a -- I communicate by telephone and
20 E-mail usually.

21 Q Are you the one responsible for placing the
22 orders?

23 A I am responsible. It is completely my
24 responsibility.

25 Q Is anybody else authorized to order the tea on

1 behalf of the CHLO?

2 A No.

3 Q But is Miss Yeager authorized to order tea on
4 behalf --

5 A On her church.

6 Q Of her center in Portland?

7 A Yes.

8 Q Are there anyone else among the plaintiffs who's
9 authorized to order the tea?

10 A No.

11 Q Can you describe the record-keeping system that
12 you maintain for keeping track?

13 A Keeping track of the tea?

14 Q Yes.

15 A When the tea -- you want the Brazilian side?
16 You want the whole picture or you just want what we do?

17 Q Let's start with what you do.

18 A The tea is brought into -- all the tea comes
19 through me. The tea is put into quart containers. Each
20 container has a number. That number is recorded. We have
21 a program which records and tracks that. It's stored.

22 And so it's accounted how much came -- how much is
23 received. Then it's divided in that way and put into
24 small -- a quart is a useful amount to divide it into.

25 Each one of those bottles has a number. That number is

1 tracked into a program.

2 Every time there's a ritual, what is recorded is
3 how -- is what number was used, right? So say one through
4 50. So one through five was used in that. All right.
5 Matched up in terms of the deducted -- however done in the
6 computer program. That is also what is also tracked as
7 the number of participants in the ceremony, the type of
8 ceremony. That's the system.

9 And as I said, all the tea goes through my
10 hands. It is stored in a secured location. There are
11 three people that have access. There's only -- there's
12 actually three people who know the location. We don't
13 tell people in the church where the location is. And
14 there's only three people who have access to it. There
15 are two keys; one -- and three people have access at any
16 time. And there's only one person that's
17 authorized sometimes when I'm not in town.

18 So there's one person -- one of those three is
19 authorized to get the tea for a particular ceremony. That
20 is discussed with me. And then the same method is used --
21 how much was used. And there's a frequent matching up.
22 And I can say there has never been any instance when any
23 tea has been -- has been out of that system. In other
24 words, there's no tea that has disappeared and been
25 unaccounted for and turned up in somebody else's hands.

1 Starting in 1993 never has happened.

2 Q Who maintains -- you said it's a program. So is
3 there a database where you input all this information?

4 A Yeah.

5 Q Are you the one that maintains it?

6 A No. Not my expertise by any means.

7 Q Through that program, could you -- could someone
8 do a full accounting in order to see whether the amount
9 that was imported was the same amount as was received?

10 A Yeah.

11 Q And that actual amount as recorded is dispensed
12 at various ceremonies?

13 A Yeah. For instance, this Exhibit 4 says how
14 much was taken from Brazil, right? They have their own
15 accounting system for their tea. We don't involve
16 ourselves in that. We begin our interactions at this
17 point. That is then matched up against what arrives and
18 it's put into the system and then it -- it's an internal
19 accounting at that point; how much we put in, how was it
20 used, how does that match up. And it's recorded down to a
21 fine -- but not -- I mean, it's not recorded to the
22 millimeter but it's recorded to -- I don't know -- the
23 quarter of a quarter of a -- of a quart. I don't know how
24 that matches up. It's four ounces.

25 Q So how many times a year would you on average

1 receive a shipment?

2 A Up until now twice.

3 Q Twice a year. And how many -- what is the
4 volume that you receive per shipment?

5 A Well, this is actually something I was -- one of
6 the questions in the interrogatory I had to think about
7 because our needs have shifted. The best I can tell you
8 is on an average -- an average we receive 200 liters a
9 year which translates -- and then there's a quart. Liters
10 are bigger than a quart. So it translates into 220 quarts
11 a year.

12 Q So the measurement in which they arrive is
13 liters but then you move it into different, smaller
14 containers?

15 A Quart. This country we use quart. That country
16 they use liters. A liter is a little bigger than a quart.
17 So there's a calculation -- I don't know exactly what it
18 is but a liter is slightly bigger. So we receive 10
19 liters, and we end up with 12 quarts, something like that.
20 Eleven and a half quarts, something like that.

21 Q So you store the tea in a different container
22 from the one it's shipped in?

23 A Yeah.

24 Q And do you alter the tea in any way when you
25 transfer it from one container to another?

1 A Not at all. Not at all.

2 Q Do you ever add anything at all to the tea --

3 A Nothing.

4 Q -- at any stage in the process before

5 consumption?

6 A Never.

7 Q Are there variations in the concentration of the

8 tea?

9 A Yes.

10 Q Can you please explain the variations.

11 A The simplest way to describe it is there are

12 teas which are reductions. So if you know anything about

13 cooking, you make a reduction. Just means it's boiled a

14 little longer. There's variations. The Santo Daime tea

15 is made according to a very specific formula. So the

16 Santo Daime tea is actually made in -- the tea we receive

17 is made in three different locations in the Amazon forest.

18 But it's made according to a very specific formula

19 according to a very specific ritual. And in that formula

20 there is -- there are some batches of the tea which are

21 reduced simply, right? So you have a -- this much will be

22 reduced to a double or triple strength. And there are

23 various reasons for that. Part of the reason is if you

24 are going to be transporting it to another place, even

25 within Brazil, but certainly if you are going to be

1 sending to a different country, a more reduced
2 concentration is more efficient.

3 Q Do you ever dilute some of the stuff that's at a
4 higher concentration?

5 A No, no. This is something -- see, the Daime is
6 made -- right? Our understanding and our observation is
7 that the Daime is imbued with the -- we consider it to be
8 the body and the blood of Christ. It's not a tea. I
9 mean, it's the body and blood of Christ. So we put it --
10 something you don't mess with is the body of Christ. You
11 don't add something to it or subtract something to it
12 because it's not made simply like in a lab or a kitchen.
13 It's made in a sacred ritual. And there's a moment when
14 those components become Daime, right? They are declared
15 by the master who is the person who is the maker. They
16 are called the feitor, F-E-I-T-O-R, which in Portugese
17 means the maker. They are the person in charge of the
18 process of making the tea. It's a very elaborate, very
19 beautiful ritual all done in what the Buddhists called
20 functional silence; you speak only what's necessary to
21 accomplish the task.

22 The component parts are prepared. The women
23 pick the leaves; the men prepare the vine. They sit in
24 rows like this; you have eight guys here. And pounding it
25 for hours with a mallet. Can you imagine for -- pounding,

1 pounding, pounding, pounding for hours? That's how they
2 make it. The feitor or master puts it in a big pot filled
3 with pure water and puts it on a fire that's huge like a
4 furnace made with native wood. And then it's boiled.
5 That's all a physical process although it's constant
6 prayer and constant singing and constant attention.

7 At some point -- that's what makes a maker --
8 and the maker -- that person sees, feels, just knows that
9 it has become imbued with the energy of the Christ, of
10 that master -- of that master, Jesus. So they then
11 declare okay, now it's Daime. Before it was tea; now it's
12 Daime.

13 So we don't alter that in any way. That's
14 sacred. That's something that -- we receive that as the
15 most sacred substance that we can have. So we have never
16 altered it in any way.

17 Q Is there a fixed quantity of the leaves and the
18 vines that is used to make a batch of the Daime?

19 A Yeah. A -- fixed in a -- let me say this: It's
20 made according to a formula. But because also it's a
21 natural substance, it's an organic, natural substance.
22 There can be variations in exactly where the plants were
23 grown. And so one location, for instance, within the --
24 these plants are endemic to the Amazon region. Each
25 subregion slightly more sun, slightly more something. So

1 also know that that analysis was done in Europe, right?
2 It was done in Spain particularly. There was an analysis
3 of the tea. I don't know the numbers. It's not my
4 expertise.

5 BY MR. BEANE: (Continuing)

6 Q This analysis in Europe that you are referring
7 to -- was that a similar circumstance where authorities
8 had seized it?

9 A Yeah.

10 Q Are you aware of anybody ever performing a test
11 of the substance just for toxicology research or health
12 research?

13 A No, I'm not aware of it.

14 Q So do I understand correctly that the Bend
15 center would need to receive Santo Daime tea from you and
16 your church --

17 A Yes.

18 Q -- in Ashland?

19 A That's right.

20 Q And just to be clear, Portland can receive the
21 tea directly, but Bend cannot?

22 A That's right.

23 Q You mentioned that you maintained records of the
24 amount that's consumed at various ceremonies and Works.
25 Do you -- what level of specificity is involved in those

1 records?

2 A Okay. I want to answer your question. Can I
3 answer it in two parts? Is that okay?

4 Q Sure.

5 A In answer to your specific question, at this
6 point we would record the -- as I said, we have a
7 number -- numbering system. So we would record the number
8 of the specific bottles that was used. And then if there
9 was a portion left in a bottle, which quite often happens,
10 so we would say, you know, one, three, five and seven and
11 then half of eight remained, something like that. So
12 that's the specificity. Or a quarter of it or a third of
13 it.

14 What I do want to say is this -- that's the
15 specific answer. What I want to say in terms of this
16 record keeping is I made a conscious decision -- we made a
17 conscious decision after my house was invaded, and I was
18 taken to jail to not keep -- this was a conscious decision
19 to not keep records of that kind for a number of years.
20 The reason was that the threats that we had received --
21 two levels. One was the trauma of that hanging -- was so
22 strong -- I mean, my daughter was 12 years old and was
23 sitting doing her homework in her country house in front
24 of the computer. And a huge guy with a big gun appeared
25 at the window and started yelling at her to put her hands

1 on the computer. She was 12 years old. She was
2 traumatized for literally years about this. So on a
3 personal level, I don't want those -- that happening
4 again. Protect my family.

5 But also we had received very specific, clear
6 threats, right? The assistants -- what do they call it?

7 MR. HABER: Assistant U.S. Attorney.

8 THE WITNESS: Assistant U.S. Attorney for the
9 State of Oregon conveyed to my attorney -- conveyed
10 specifically -- he said as long as I don't hear that you
11 guys -- that you are bringing the tea in or doing
12 ceremonies, I won't bother you. But if I ever hear it,
13 I'm going to come get you. So we made a conscious
14 decision well, we are living under threat; I'm not going
15 to keep record of every drop of tea. I don't want to -- I
16 can't -- I don't want to do that. I don't want to give
17 evidence. I don't want to have what the government would
18 consider evidence. I'm not going to do that.

19 So there was a period of time where the written
20 records were not kept. There were verbal communications.
21 Always the tea has been completely under my control. Not
22 a drop of tea goes out that I don't know about. But
23 didn't keep records completely as we have been, preparing
24 to have made the decision okay, it's time for us to open
25 this conversation that we are having now.

1 We started keeping these very, very specific
2 records that I'm talking about. So there's a gap and it
3 was a conscious gap. It wasn't out of being laissez
4 faire; it was a conscious decision because of the fear
5 that we were living under.

6 And then in the middle of this process -- I want
7 to say one other thing. When the UDV case before the
8 Supreme Court -- when the briefs of the DOJ then stated
9 that there were no circumstances under which this tea
10 would ever be allowed in no matter what the cost on
11 religion -- I'm paraphrasing of course. But my
12 understanding of what this was and questioning by the
13 justices was they restated are there any circumstances?
14 No. There's no way we will let one drop of tea because we
15 can't afford -- whatever the reasons were. We were like
16 okay, I guess we have to keep living under this cloud
17 until we reach the moment where we feel like okay, in
18 spite of the fear, in spite of the difficulty that people
19 feel and the fear, we are going to have to do this. We
20 are going to have to go forward because we can't live that
21 way.

22 And we have people who are in fear; people who
23 are leaving the church and can't come to the church
24 because we are afraid. So I just wanted to give that as a
25 subtext to the reason why we have records that are very

1 level of security is that it's in a double-locked, right?
2 There's two barriers. Yeah. Two barriers with locks on
3 each of the doors.

4 Q So are there only three people who are
5 authorized to transport it from that location --

6 A Yeah.

7 Q -- to a ceremony or to Bend I assume?

8 A Yeah. Now Bend has their own. Once it gets to
9 Bend, there's one person in Bend that is authorized to
10 dispense Daime. Each Daime configuration, center, point
11 has one person who is -- secures the tea and is allowed to
12 serve it. So Bend has their own person who does that but
13 that person will get it from us.

14 Q So you do keep track of the individuals who
15 participate in the ceremonies?

16 A Yes.

17 Q Do you maintain any demographic information,
18 gender or age, of the people who --

19 A No. Informal. The best demographic information
20 is Dr. Halpern; Dr. Halpern's study. But that was his
21 thing. It didn't come from us. He did that.

22 Q Are there any examples of times where -- where
23 tea that you received or that was imported into Oregon was
24 not consumed; it was disposed of in any other way --

25 A No.

1 Q -- either through loss or theft or spillage?

2 A No. There's no theft. There's never been
3 theft. There's never been -- yeah. It's -- as liquid,
4 there are times when it will spill. You know, times when
5 a jar gets dropped. Normal thing. And then it's recorded
6 as, you know, it would normally be, whatever. I don't
7 know the designation how. It would be rarely. We handle
8 it very carefully but it's happened, certainly.

9 Q Have you ever had an occasion to dispose of it
10 because it spoiled or for any other reason?

11 A No. It's very, very rare. And no. The answer
12 is no.

13 Q Have you ever imported the plants that are used
14 to make the Santo Daime tea?

15 A No.

16 Q Are you aware of anybody who has imported the
17 plants?

18 A No.

19 Q Are you aware of whether the plants could be
20 grown in the United States?

21 A Like climatically you are asking?

22 Q Yeah. Just is it possible?

23 A I think it's possible, sure. There is places in
24 this country that are close enough in climate could be.
25 Would be a possibility, sure.

1 to be made here, they would come and actually make the
2 Daime and eventually the same thing is -- leading
3 ritual -- they would teach us. Eventually, years down the
4 road, maybe we would make it ourselves.

5 Q Is there any other way consistent with the
6 practices and beliefs of the Santo Daime Church to make
7 the Santo Daime tea without those two plant ingredients?

8 A No.

9 Q And could the Santo Daime tea be prepared
10 including any additional ingredients?

11 A No. Wouldn't -- it wouldn't be Santo Daime.

12 Q Are you aware of any other -- other than the
13 Santo Daime Church, are you aware of any other groups
14 besides the UDV that used the same substances in a tea?

15 A In Brazil, yes.

16 Q Outside of Brazil?

17 A I don't know. I don't know the answer to that
18 question.

19 Q You weren't aware of any?

20 A No, not aware.

21 Q How many different churches are there in Brazil
22 that use the same substances in a tea?

23 A Churches meaning separate religions? Is that
24 what you are saying?

25 Q Separate from the Santo Daime and of the UDV.

1 THE WITNESS: Okay.

2 MR. HABER: So read that first, John. Take your
3 time.

4 THE WITNESS: The whole thing?

5 MR. MARMADUKE: Is there some specific --

6 BY MR. BEANE: (Continuing)

7 Q I'm going to direct your attention to the --
8 couple of specific pages. If you would turn to page 336.

9 A Okay.

10 Q And if would you read beginning at line 11
11 there. I will read the parts, but you can feel free to
12 read along. The question asked was to some extent though,
13 have you tried to distance yourself from the Santo Daime?
14 Has the UDV USA tried to distance itself from the Santo
15 Daime.

16 Answer: I have had concerns about some of their
17 practices which I have articulated pretty openly.

18 And then beginning on line 18, question: What
19 concerns?

20 Answer: That they didn't treat, to my
21 understanding, the sacrament with the same degree of
22 responsibility and care that I saw within the UDV. It
23 appeared they were much more informal in terms of
24 welcoming large numbers of people, in ways that I
25 considered to be not careful and irresponsible.

1 A Uh-huh.

2 Q In your opinion, is that a fair
3 characterization?

4 A First of all, seems to me that Mr. Bronfman is
5 speculating; he's giving his point of view. I don't have
6 any -- it's not my experience. I have been in the Santo
7 Daime for 20 years. I'm one of the -- outside of Brazil
8 one of the more -- most experienced and responsible
9 leaders. And what he's saying is not consistent with my
10 experience of being inside the Santo Daime. And it
11 strikes me that in the same way that I wouldn't speculate
12 from -- I'm outside of the Uniao Do Vegetal, and I don't
13 have the perspective of being inside. Anything I would
14 say about the Uniao Do Vegetal is an outsider's view based
15 on speculation and opinion. That's how I feel about it.

16 I don't relate to what he's saying. It's not my
17 experience. If you want me to comment specifically, it's
18 simply not true. I mean, put it this way: I don't know,
19 without talking to him, how he would distinguish how he
20 cares for his hoasca compared to how I care for my Daime.
21 I don't know; he's not saying.

22 MR. HABER: Hang on a second.

23 MR. MARMADUKE: Excuse me; I need to interrupt
24 you here.

25 THE WITNESS: Please.

1 MR. MARMADUKE: This is the first time I have
2 seen this, Eric, but I notice that you didn't include the
3 next highlighted portion on the next page at page -- at
4 line 15 where the question is, do you believe or know that
5 any of the tea that is being used by Santo Daime is going
6 to people outside the Santo Daime Church.

7 Answer: I really haven't done that level of
8 investigation.

9 MR. HABER: You did not read that to the
10 witness.

11 BY MR. BEANE: (Continuing)

12 Q Okay. Just for the record, the part that he
13 just read is on page 337, lines 15 through 19. There's
14 one other part I want to direct your attention to. It's
15 also on page 337 and it's an answer that begins --
16 actually it begins on page 336, line 25. The relevant
17 part is from lines 4 to 9 where he says, you know, when
18 the issue came up in our litigation when they tried to
19 enter an amicus, I was very relieved that the judge was
20 able to distinguish that these were two separate
21 institutions, that the issues -- while some elements were
22 common, this wasn't a central element of the litigation.

23 A Okay.

24 Q What is your reaction to that statement?

25 MR. MARMADUKE: Excuse me; I was trying to catch

1 what you said. I thought you said 336, but you said 337.

2 BY MR. BEANE: (Continuing)

3 Q Yes. That was 337, lines 4 through 9. I mean,
4 you can --

5 MR. HABER: Hang on a second.

6 THE WITNESS: Let my lawyer here catch up.

7 MR. MARMADUKE: I'm going to object to the form
8 of that question because that statement itself is so
9 ambiguous it's unintelligible as to what's being
10 discussed. It says well, some elements were common. This
11 wasn't an element of this litigation. I'm not sure what
12 he's talking about. I'm not sure it's clear to anybody
13 without a more thorough exploration of this whole thing.
14 Do you have any idea what he's talking about at that --

15 THE WITNESS: I felt the same way. I'm not sure
16 what he means. He's stating a fact, but I don't know what
17 his point is. I'm not sure what the point of the question
18 is either.

19 BY MR. BEANE: (Continuing)

20 Q My question to you is whether, in your opinion,
21 the UDV and the Santo Daime Church should be treated
22 differently under the law?

23 A Absolutely not.

24 Q Why not?

25 A Absolutely not because what distinguishes the

1 Santo Daime is -- are not things -- has nothing to do with
2 the application of law. From my point of view, both the
3 UDV and the Santo Daime are legitimate religions; they
4 have been through investigation since 1983 in Brazil.
5 That's 25 years of investigation. Both of them have
6 proven track records, both of them came from the same
7 origin, both of them use -- virtually use the same tea.

8 There are differences in the ritual, there are
9 differences in the -- how do I want to say it? The
10 administrative structure; they are structured somewhat
11 differently. There are some differences, slight
12 differences in -- what would you call it? The rhetoric.
13 Cosmology is slightly different. But in all the ways that
14 one would look at religion -- the sacred use of the tea,
15 how the tea is used, how the tea is held, how the tea is
16 produced, how the tea is the place that -- it holds the
17 centrality, and the impossibility of conducting ritual
18 without it. All of those things are identical.

19 And they have the same rights under the both the
20 Constitution and the First Amendment and the Freedom of
21 Religion Restoration Act. For me, they are identical in
22 all the important areas. And as I said, what
23 distinguishes them are simply internal decisions. The
24 rituals are different. The UDV does it twice a month; the
25 Santo Daime is more often. We sing, which is not

1 something which any government would pretend to have any
2 opinion about.

3 So from my point of view, there's a -- they
4 are -- deserve to be treated exactly equally.

5 Q Do you know which church was established first?

6 A The Daime by many years; 30 years, 31 years.

7 Q Was the UDV part of the Santo Daime Church
8 before it became independent?

9 A No. The UDV was started by a man who had his
10 own inspiration. Whether there was a connection between
11 the two is something of legend and conversation. But Maso
12 Gabriel who started the UDV started it in -- I'm not
13 familiar with the details of the history, but they -- they
14 didn't grow out of the Barquinha. Came directly out of
15 the Maso Do Veo, but the UDV didn't.

16 Q Have you ever participated in UDV ceremonies in
17 the United States?

18 A No.

19 Q Would you allow a UDV participant to participate
20 in one of your ceremonies?

21 A Sure.

22 Q Would they -- would you require them to go
23 through the interview process and fill out all the same
24 forms participants would fill out?

25 A Yeah, absolutely. Filling out the forms is part

1 record what exactly a sacrament is. In terms of the Daime
2 tea, what is a sacrament?

3 A Sacrament is -- in general is substance that is
4 ascribed by a religion to bear the personage of the divine
5 being; to embody the divine. And that when a person
6 consumes that, takes that body, right? So in the Catholic
7 Church would be wine and a wafer. In the Holy Daime it's
8 the Daime tea. In the UDV would be the tea. In other
9 religion they use other sacraments. In our religion is
10 imbued with the essence of the master, the Christ.

11 Q It's the spirit of Christ?

12 A The spirit of Christ is in that. With taking
13 that, you are joining with the body and spirit of Christ.
14 There's a central practice. The question is is it the
15 central practice; is it part and parcel of that religion.

16 Q The other thing I was going to ask you about was
17 in reference to what you alluded to as the raid on your
18 house by the FBI and the DEA. Would you explain exactly
19 what did occur on that occasion.

20 A Yes. So May 19th, 1999. My wife and I and a
21 woman who at that time was 75 years old, member of the
22 church, were visiting a bedside of a man in our church who
23 had died -- that day he had. And we had been next -- our
24 community was gathered around him. We were praying. A
25 very beautiful, powerful moment.

1 And meanwhile, that day a shipment of Daime
2 which came in the way that it came at that time -- was
3 shipped by air to Los Angeles where it was brought by a --
4 what they call a broker. I forget the -- a customs broker
5 through -- assigned to a carrier. Had been doing this for
6 a number of years. A shipment had come, had been
7 intercepted. We didn't know about that. Had been tagged
8 and electronically monitored. Had arrived at our house
9 that day.

10 And we returned home in this state of having,
11 you know, blessed this man who had died. And I drove up
12 in the car -- it was a rental car because our car was in
13 the shop. I saw a motor home in the driveway; I didn't
14 have a motor home or knew anybody that had a motor home.
15 And all of a sudden -- so I thought, I don't know anybody
16 who has a motor home. And all of a sudden my car is
17 surrounded by five men with high-powered rifles and guns
18 and no identification on them on the front. And they are
19 yelling at me to put my hands up. And at first -- my
20 first thought was -- right in those moments your body
21 slows down and your body closes down. They must have been
22 chasing some criminal who was in a motor home, and they
23 got confused and now they are -- so that was my first
24 thought. And then it was like a slow-motion movie. And
25 then I thought oh, oh, oh, oh, oh, I get it; I get it.

1 And they started, put your hands up, put your
2 hands up. The woman in the back seat was deaf. And the
3 car -- when I turned the key off -- they open the door,
4 and the key starts going -- buzzing. And put your hands
5 up. She can't hear them because she's deaf because of the
6 buzzing. I'm like, guys, can I take that out, thinking
7 they are going to shoot us because that poor woman is
8 deaf. They said no, you can't. They took me out of the
9 car. They put -- they frisked me and put -- what do you
10 call -- handcuffed -- the plastic things on my wrists
11 behind me.

12 Took me into my house. Turns out they had been
13 there two hours with my children. I'm sorry. This is
14 very -- it was really intense. I only told you about my
15 daughter who was 12 years old. My son was 16. And we had
16 a visiting exchange student from Poland. They came in,
17 put a pistol in front of the kid from Poland's throat. He
18 held my kids at gunpoint, terrorized them. They didn't
19 beat them or anything. But middle-class kids living out
20 in the country.

21 They waited for us to get home. They put me in
22 a chair. My -- lined up my family. My daughter was
23 completely freaked out by this invasion of her house. And
24 then they proceeded to go through my house, looking for
25 what they assumed were drug paraphernalia and money and

1 all the things they would expect. Found none of this. Of
2 course all they found was altars and pictures of saints.
3 And they seized the Daime. At that time there were 200
4 liters of Daime. At that time it was stored actually in a
5 locked place but it was on our land.

6 They went through the house, took papers, took
7 pictures, took all the evidence. After another four
8 hours -- so it was a total of four hours they were there.
9 They then took me to jail. On the way -- did the best
10 they could to terrorize them; best they could to scare
11 them. I was sitting in the front seat. They wouldn't
12 take let me take my hands -- they wouldn't untie my hands.
13 I couldn't get out to pee. They were trying to scare me.

14 And meanwhile they are coming in and talking
15 about my children are victims and just trying to scare me
16 in general. And then they sent me to jail with two DEA
17 agents who had a conversation -- like this one guy says,
18 what did you do? This is the other guy -- what's his
19 crime? How many years? The guy says I think 30 years.
20 He said, how old are you? At the time I was 49. You take
21 a year for the trial; you get out of jail when you were
22 80. Your wife -- we are going to send her to jail too. I
23 don't know what we will do with your kids. Maybe just
24 give them away. I don't know what we will do with your
25 kids.

1 I spent overnight in jail. Then they sent me
2 with the FBI guys who were doing soft cop things and
3 trying to get me to give up my sources. And I explained
4 to them that there was no such thing. And then they
5 dropped me off at home, and they ended up never charging
6 me with anything. We had a number of conversations then
7 with the assistant -- the State's attorney who then
8 culminated what I said; threatening me with that kind of
9 thing.

10 The next day -- the worst thing that happened --
11 the worst thing that happened was two weeks later they
12 sent Child Protective Services to my children's schools.
13 My son was in high school; daughter was in middle school.
14 They were called out of class to question my children
15 about whether their father had given them drugs and just
16 to scare us, just to -- my children -- again, my daughter
17 was completely -- my son was 16, and he was more mad. My
18 daughter was super scared and freaked out. Took seven
19 years for her even to talk about it with me. That was the
20 worst.

21 And then I got calls middle of the night -- hi,
22 this is Steve; I just went to a ayahuasca conference, and
23 I'm wondering can I buy some ayahuasca from you? That was
24 sort of B movie stuff. That was --

25 Q Any crank calls?

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CERTIFICATE

I, MELANIE J. SAVORD, Certified Shorthand Reporter for the State of Oregon, do hereby certify that I was present at and reported in machine shorthand the oral proceedings had in the above-entitled matter.

I hereby certify that the foregoing is a true and correct transcript, to the best of my skill and ability.

Dated this 9th day of October, 2008.

Melanie J. Savord
CSR Cert. No. 96-0325