

**IN THE HIGH COURT OF NEW ZEALAND
WHANGAREI REGISTRY**

CIV 2013-488-108

BETWEEN

JZK, INC

First Plaintiff

AND

JZ KNIGHT

Second Plaintiff

AND

DAVID E MCCARTHY

Defendant

BRIEF OF EVIDENCE OF DAVID EDWARD MCCARTHY

MAY 8 2014

Introduction

- 1 My full name is David Edward McCarthy.
- 2 I was born in London on 4 July 1952 and am aged 62 years.
- 3 I am now a New Zealand Citizen and resident. I live near Kaiwaka Northland.
- 4** I am an IT website designer who specialises in web site design with integrated multimedia audio-video presentations for small companies and artists. I am also a music producer and recording artist. At the time that I was served with this lawsuit, my wife Margaret and I were in the process of turning our guest cottage into a profit business as a combination bed and breakfast/recording studio. I would be the in house consultant and producer. This type of business has had great success in other areas.
- 5 My wife, 'Margaret, works full time and is the main breadwinner in our family during this transitional time. I receive a Government Sickness Benefit of \$55.77 each month to supplement our low income due to an ongoing debilitating and painful health condition. I pay \$40.00 each month towards my legal aid debt.
- 6 I am making this brief in defence to claims brought against me by the Plaintiffs.
- 7 This proceeding is the second legal proceeding that Plaintiff JZK has brought against me. The first proceeding was dismissed with prejudice.
- 8 The other proceeding was commenced in the United States ("**US Proceeding**") against Virginia Coverdale who, like me, was a former member of Ramtha's School of Enlightenment which I, Virginia and others have discovered is more accurately described as a dangerous and deceptive pseudo-religious cult and a business that is apparently involved in several illegal activities.
- 9 Accordingly, I shall refer to the First Plaintiff as the "Ramtha Cult" or "Cult" in my evidence. The Plaintiffs have objected to my describing the purported school as a cult. However, in 1988, ABC News referred to the Ramtha School of Enlightenment (RSE) as a "no-fault cult" on the TV news magazine 20/20. There is no evidence that JZ Knight or JZK ever took legal action against ABC News for that term. RSE has also been called a cult in news reports in the US and other countries, since that time. Therefore, it has been an accepted term for RSE since 1988.

Background

- 10 By way of background, the Plaintiffs are extremely litigious and have been involved in numerous civil suits in the United States and overseas, including Austria.

- 11 The US Proceeding brought against Virginia Coverdale resulted in an injunction against Virginia prohibiting her from releasing Ramtha Cult's proprietary materials. The Court also ordered Virginia to pay solicitor/client costs to the Ramtha Cult totalling \$USD600,021.
- 12** The US Proceeding was in part based on a document described as the September 2007 version of the Conditions of Participation ("**2007 COP**") [**CB**] between Virginia and the Ramtha Cult. In contrast, the breach of contract claim against me in this proceeding has been based on a different document described as Conditions of Participation ("**1993 COP**") [**CB**] which I signed on 11 November 1993 with a party named as "Ramtha School of Enlightenment".
- 13** Washington State government agencies have no record of any business or any type of organization called "Ramtha School of Enlightenment" at the time I signed this document in 1993. Lawrence Graham repeatedly states in his Brief of Evidence that the Ramtha School was a Washington business at the time I signed the contract. Washington businesses are required by law to register with the state government. Michael Wright stated in his Brief of Evidence that the Ramtha School was run out of a non-profit called "Church I AM" until 1994. But the Washington government records show that "Church I AM" was dissolved in 1988, and there was no mention of Ramtha in that non-profit's records on file in the Washington State archives.
- 14** As such, the 1993 CoP was not a valid contract when I signed it, because the Ramtha School of Enlightenment was not a legal entity at that time. Therefore, I breached no contract with the Plaintiff. It is quite reasonable to assume that JZ Knight was very aware of this fact when I signed the CoP in 1993, when that JZK/JZ Knight were aware of this fact throughout this lawsuit against me, claiming Breach of Contract and Breach of Confidence.
- 15 I understand that Virginia Coverdale has been unable to pay the \$USD600,021 cost award and as a result the Ramtha Cult is seeking to imprison Virginia as a means of enforcing the judgment [**CB**].
- 16 There is also a certain amount of vindictiveness in the US Proceeding. The relationship between the Second Plaintiff ("Judith Knight") and Virginia is extremely acrimonious. In particular, Virginia has been the subject of public verbal abuse by Judith Knight (including describing Virginia as a "whore") [**CB**] after Judith Knight's romantic partner left Judith Knight for Virginia.
- 17 I was involved in the US Proceeding as one of a number of unnamed Defendants (John Does). However, when I became involved in the US Proceeding by identifying myself to the US Court and claimed the existence of the US Proceeding

meant that the New Zealand High Court was inappropriate to hear this claim, the Ramtha Cult successfully applied for the proceeding against me (in the US) to be dismissed.

18 In any event, the US Proceeding has been stayed pending an appeal by Virginia to the Washington Supreme Court.

19 The point I wish to make here is that the Ramtha Cult uses vast financial resources to, or attempt to, silence valid criticisms and reporting made by others, including Virginia and me. I view this proceeding as part of that attempt to suppress my criticism and reporting or to put it another way – silence a whistle blower and kill freedom of speech and freedom of the press, since I have been recognized as a citizen journalist in the U.S.

20 I am defending this proceeding because I believe the claims against me are misconceived and as a citizen journalist and former member of the Ramtha Cult have the rights to criticise and publicise what I and others believe to be a dangerous religious cult, and a business that breaks state and federal laws. The very videos, which I shall refer to later in my brief, that the Plaintiffs seek to destroy, are simply small edited extracts of videos created by the Plaintiffs (or people employed by them) and a third party who has gifted a video to Judith Knight. The Videos are visual and audio proof of the dangerous, and--based on verifiable evidence and statements by government officials-- unlawful practices of the Plaintiffs that have affected me and thousands of others. Furthermore, those practices have the potential to detrimentally affect thousands more in the future.

21 Glen Morgan a U.S. citizen journalist for 'The Freedom Foundation' **[CB]** prevailed in court against the Ramtha Cult last year over copyrighted videos that Glen Morgan also put on YouTube. Glen Morgan's citizen journalist rights to withhold the source of the videos were upheld and recognized in U.S. the Court **[CB]**.

22 Glen Morgan's YouTube video was the source of my video "JZ Knight talks about Mexicans"

How I was recruited and became a member of the Ramtha Cult

23 In 1989, I was 37 years old and had been married to my first wife, Maggie, for about ten years. We had two children aged six and eight years. I was a self-employed cabinet maker.

24 At that time, I was facing immense challenges in my life suffering from ill health and depression after the suicide of a close friend. I heard about "Ramtha" at a local church hall during a presentation on faith and spiritualism. So, in September

- 1989 I decided that it would be worthwhile for me to fly from New Zealand to Yelm, by myself, and attend one of the Cult's beginner weekends.
- 25 At the time, as now, the Cult held itself out as teaching a number of purported techniques that, it claimed, would lead the participants to spiritual enlightenment.
- 26 During that weekend I heard Judith Knight speak about what the Cult could do for me and others in attendance. Cult members that I met were idealistic, well-educated and caring.
- 27 I found Judith Knight in particular to be a very charismatic woman who promised great spiritual knowledge, happiness and the ability to heal myself. All I had to do, she said, was to become a full time follower of Ramtha. I also thought that I would be able to leave at any time.
- 28 At times Judith Knight spoke in her personal capacity and at others claimed to be channelling the teachings of a 35,000 year old Lemurian Warrior named Ramtha.
- 29 During her purported channelling, Judith Knight would go into what appeared to be a different personality using male body language, clothes and voice. I now realise that Judith Knight is no more than an actor that has, over the years, perfected her "channelling" act. In fact Judith Knight's channelling Act has become so convincing that it has convinced figures from the entertainment world such as Linda Evans, Shirley MacLaine, and Salma Hayek. As a result Judith Knight has created a multi-million dollar corporate empire centred on her home in Yelm, to become a very wealthy and influential woman.
- 30 In her personal capacity Judith Knight described overcoming childhood abuse and extreme poverty. She described 'Ramtha' as an angelic apparition who appeared out of thin air in her kitchen, promising to teach her "enlightenment".
- 31 During that first introductory weekend Judith Knight as 'Ramtha' spoke about love, humanity and the purpose of life. She/he was extremely inspiring. It seemed to make perfect sense to me. Every human being was a magnificent God, but a sleeping God. 'Ramtha' had come to wake us up and light the way with miraculous powers just like Jesus with a profound message of love and compassion. According to Judith Knight, Ramtha could impart a priceless sacred knowledge no less (and perhaps even greater) than all the great Prophets such as Adam, Noah, Moses, Jesus, Krishna, Buddha, the Virgin Mary and, in fact, all of the great spiritual teachers and prophets who came before to help humanity heal and blossom into Goodness and Godhood. 'Ramtha' spoke of the prophesied New Age of enlightenment.
- 32 The lectures were very inspiring and positive, pulling references from different religious faiths intertwined with scientific explanations and research, Psychology,

Art, Music and poetry. 'Ramtha' also claimed we had also been chosen by him to join his school as the forerunners of enlightenment the 'Gathering of the Eagles'. We all felt very special and were called 'Masters' of the Great Work.

- 33 According to Judith Knight/Ramtha, we were to herald a new chapter in the spiritual evolution of mankind, born just for this purpose. Awakened Gods with miraculous healing /psychic powers and powerful spiritual knowledge of the meaning of life to benefit all mankind. The same spiritual foundations of all other religions were but a mere shadow.
- 34 Judith Knight/'Ramtha' claimed our suffering stemmed from our greed fuelled by ignorance and fear that separated us from 'The Lord God of our Being' that our very thoughts created reality.
- 35 We were taught a sacred breathing technique called (C&E) Consciousness and Energy. We were told we would learn to 'create our reality' and free ourselves from pain and suffering and that other secret and sacred techniques would be taught. Some, Judith Knight, claimed could and had healed all disease. We were told that within seven years of attending the school many new Christ beings would emerge to help save the world.
- 36 We were told that the Cult's headquarters in Yelm was a sacred and protected place soon to become a spiritual Mecca to the world with millions of people flocking to hear 'Ramtha's words and to enrol. The other converts that I met were idealistic, well-educated and caring, only wishing to become a force for good in the world.
- 37 As one progressed from an RSE beginner through to the 'advance groups' we became privy to the "secret" teachings. It was at these times that the microphones and recorders were turned off. We were told of a massive conspiracy known as the 'One World Order' being a secret globalist group of bankers/ politicians bent on enslaving mankind using disinformation and wars. Later we were told this group was in league with aliens (the Greys) that had been given permission from our Governments to abduct and experiment on humans.
- 38 We were told to dig underground bunkers and cover them with copper foil to prevent the aliens from discovering them from above. To store massive amounts of food and a cache of weapons in preparation for an imminent world catastrophe called 'The Twelve Days of Light' during which time the ancient God Jehovah with an army of reptilian humanoids were going to invade Earth and we had to be prepared. We were told however, that 'Ramtha' would protect us and our families if we obeyed instructions and practised the techniques we were taught day and night, and dig bunkers with our bare hands if we have to.

- 39 Judith Knight has written a number of books, which I shall refer to in more detail below, that are often claimed to have been authored by Ramtha (with the forward written by Judith Knight). In fact the books are authored by Judith Knight herself.
- 40 In any event, during the follow-up week in March 1990 and subsequent events I attended, I was promised that:
- (a) if I continued to attend events [CB] held in the Cult's compound, I would become "enlightened"; and
 - (b) the 'school' was destined to create many new "Christ's" to help heal and bring enlightenment to the world.
- 41 I and other attendees were also told:
- (a) that the process to achieve enlightenment took seven years to complete;
 - (b) that we would need to fully participate in the teaching techniques and to remain a current student at all times for the full seven years; and
 - (c) to leave our families behind even if they were unsupported because if we made "The School" the most important thing in our lives and moved to Yelm then "Ramtha" would protect them in our absence.
- 42 I remember that what the Cult describes as The Grand Hall was actually a converted horse barn with a dirt floor. We were told that the dirt was holy ground.
- 43 Whenever Judith Knight entered the arena there was loud music and thunderous applause from thousands of screaming devotees who swooned as Judith Knight performed her Ramtha welcome. We were all addressed as "Masters".
- 44 Different hierarchical groups were recognised by wearing different coloured T-shirts with insignias.
- 45 Enlightenment was expressed to me in a number of ways. However, for present purposes it can be briefly described (in terms of how it was sold to me by the Cult) as:
- "learning to harness the power of mind and to take one's body into an unseen dimension in life and in doing so realising an existence of unlimited freedom, unlimited joy and unlimited life".*
- 46 In achieving "enlightenment" I was also promised that I would acquire great wealth, miraculous healing powers and physical safety.

- 47 In particular, I was promised that I would be able to heal physical and mental injuries and diseases through the power of the mind. For example I was told, and believed to be true at the time, that I would develop the power to regrow an amputated limb [CB]. It seems incredulous to me now that I believed the claims made by the Cult in those early days.
- 48 Nevertheless, I believed what Judith Knight told me and decided to become one of her followers. In doing so, I believed that everything I was told was true including that Judith Knight had the ability to channel Ramtha. So taken was I with what I was promised and "taught" I signed the 1993 COP (some four years after the beginner weekend in 1989) in which I also agreed that everything I was taught by the Cult was true. It is worth noting at this point, that when I joined the cult in 1989, the only condition of participation was the requirement to pay Judith Knight course/event fees.
- 49 Accordingly, I made a conscious decision to follow Ramtha and returned to New Zealand in order to convince Maggie to become a follower as well. Maggie refused and "freaked out" when I told her that we would need to build an underground bunker to keep us safe from Ramtha's doomsday predictions.
- 50 Despite my entreaties, Maggie refused to become a follower and begged me not to return to Yelm.
- 51 So convinced was I in the power of Ramtha that I decided to leave Maggie and our two children in New Zealand so that I could attend the seven year course to "enlightenment". In separating from Maggie, I agreed to transfer all of my share in our assets, including our house, to her. When I left New Zealand in March 1990, I was virtually penniless.
- 52 I now know that none of what Judith Knight promised me was achievable. I also now know that there is no way Judith Knight can possibly channel a person who lived 35,000 years ago as if they continue to live.
- 53 Nevertheless, in the early years, I was entranced and committed to taking part in a seven year journey to the promised "enlightenment". Hence the sacrifices, I decided to make.
- 54 On arriving in the United States in March 1990, I received a six month visitor's visa. When that visa expired, I was determined to stay in the States and did so by creating a new identity in the name of David Gardiner and using a library card in that name. I used the library card and my New Zealand and English passports to travel briefly to Canada which allowed me to obtain a new visa every time I returned. Judith Knight and others who worked for the Cult knew about my

residency status and encouraged me to stay so that I could achieve "enlightenment".

- 55 Unfortunately, I was unable to survive without paid work as I had to fund my living expenses as well as the fees charged by the Cult to attend its events.
- 56 The Cult and its members offered me work to overcome my financial problems. That work was illegal in the sense that I was not allowed to work in the US and I did not pay income tax. Nevertheless, the Cult members assured me it was alright and I was encouraged by others who also worked illegally for the Cult.
- 57 Thereafter, I was employed in a number of different jobs including building bunkers or bomb shelters for members who were afraid of attacks by enemies of Ramtha.
- 58 I was also encouraged to invest in schemes promoted at and by the Cult. One that comes to mind was called David Hudson's White Powder Gold.
- 59 Judith Knight invited David Hudson to lecture at the cult in about Nov 1995. He claimed to be a scientist and alchemist. Cult members had to sign a non-disclosure agreement with Hudson to keep everything secret if they wished to invest in his company.
- 60 Basically the scheme was to have Cult members pre-order a "miraculous" white powder which Hudson claimed was first discovered in the Great Pyramid (in Egypt), cured all diseases (including cancer) and enhanced enlightenment. Those who joined were guaranteed to be the first to receive the powder once he was in full production. However, Hudson needed the money to build a manufacturing laboratory.
- 61 In any event, much of what we did at events held in the compound I gradually came to realise was either unsafe or downright dangerous.

JZ Knights promise to teach the power of healing

- 62 Judith Knight promised that I (and other Cult members) would be able to heal physical and mental diseases through the power of the (focused) mind. For example I was told, and believed to be true at the time, that I would develop the power to re-grow an amputated limb or raise the dead, and to create something out of thin air such as a blue feather or a Rose.
- 63 Unfortunately, blind belief in that promise has had disastrous consequences for cult members including:

- (a) **Karl Fujita who** was a close friend for many years. We worked together building underground bunkers. Karl was from Hawaii and was a dedicated follower of the cult, so much so that even after he discovered he needed urgent heart surgery he refused free treatment at the local Hospital and opted to heal himself using the Cult's techniques of "Blue Body Dance" and "The Christ Walk". Six months later Karl was found dead in his home from heart failure.
- (b) **David York** was also a good friend who I came to know while helping out as the sound man for his local stage productions shows. David was from the UK. He was so convinced he could heal himself through the Cult's techniques that after contracting HIV he refused all conventional medicine and treatment for pain. I watched him in agony practicing the Cult's techniques, his feet bleeding from massive lesions from countless hours doing "Field Work" and "The Christ Walk". I asked him why he didn't ask 'Ramtha' to heal him? He replied that he had asked Ramtha, but was told "he was not ready". David York later died in great fear, pain and confusion. I was holding his hand when he drew his last breath.

64 As Cult members, we were told by Judith Knight that even after death Ramtha will be there to greet and protect us, and we would continue our "Schooling" in a different Universe.

JZ Knight's use of "Shills"

65 "A "shill", a US term, also called a "plant" or a stooge, is a person who publicly helps a person or organization without disclosing that they have a close relationship with the person or organization".

66 I had a personal encounter with one of Judith Knight's shills happened during an event where Judith Knight acting as 'Ramtha' purported to teach a method of creating an object out of thin air. Then, across the arena came shouts and cheering I saw a woman walking through the crowds holding a blue feather over her head. She was shouting "I did it! I did it!" People started clapping and running up to her.

67 The woman who was also my partner during that event sat down next to me, so I leaned over and asked her how she did it. She looked me in the eyes and told me she had gone into the store in Olympia and bought it. I was flabbergasted, I thought she was joking. I said "That's not creating something out of nothing!" She replied "Yes it is!--I created seeing it, so I've created my own reality."

68 What very few others understood about this woman was she a cult staff member

69 I now understand she was a SHILL, but at the time, I was too shocked, confused and frightened to speak out.

Secret Techniques and Practices

70 Among the "techniques" taught in the Compound that I witnessed and endured were: "Pagan Dance" "Blue Body Dance" "Rock Work" "Paradise Beach," "Drinking a Lye-Sea Water Concoction" "Fieldwork" "Field Run" "The Tank" "Blue Body Dance" "Candle Focus" " C&E" "The Christ Walk" and "Wine Ceremony". Features of these "techniques" included: extreme physical exertion; they were often for very long periods of time; blindfolding and other disorienting techniques; deprivations of food, water, rest and access to bathrooms.

71 I describe these "techniques" in more detail below:

- (a) **"C & E"** Hyper Ventilating and screaming (alleged warrior cries) to deafening music with 'Ramtha' (Judith Knight) shouting cult indoctrination slogans for up to eight hours at a time.
- (b) **"Fieldwork"** A technique where devotees are blindfolded whilst walking around a horse paddock looking for a card placed on a fence. Sometimes there would be over 1,000 participants including adults and children. These techniques can last up to 12 hours (without breaks) during which time I witnessed (heard) participants being knocked to the ground. For advanced groups the sessions would go through the night including through rain and snow causing devotees to catch colds and influenza.
- (c) **"Blue Body Dance"** During this technique devotees draw web designs with a blue indelible pen on their bodies wherever there was injury or disease. A dance routine was choreographed by Judith Knight performing as Ramtha on stage. 'Ramtha' claimed that the technique and discipline would heal every conceivable disease and extend life beyond our genetic expectancy. This was done blindfolded to very loud trance music until total exhaustion.
- (d) **"Field Run"** This technique involved a process of running at each other while Blindfolded in a fenced horse paddock. Up to 500 children and adults are lined up on opposite sides of the paddock and told to run at each other. Carnage ensued. Staff and participants are ordered not to assist the injured however, I witnessed many that were taken to hospital with serious injuries.
- (e) **"The Christ Walk"** Participants are made to walk very slowly up and down a large field for many hours speaking an internal mantra such as "I am a fully Christ Being Realised"; "I am my Greater God"; "I Live in the now"; "My Past is Complete"; " From the Lord God of my being I am healed".

These walks would last for hours and it was forbidden to stop until ordered to by Ramtha.

- (f) **"Paradise Beach"** This technique would last 1 to 3 days outdoors without a tent, blindfolded, participants are not allowed to eat food, and have to make their way to the toilets (with permission) blindfolded. Later tents were introduced and participants were blindfolded up to five days and not to leave tent or speak to anyone.
- (g) **"The Tank"** This technique took place in a giant arena. Devotees, including children, pregnant women, and adults are blindfolded and must find (sometimes fight) their way through an eight foot high maze to a hidden room at the centre where food and water are made available. Selected participants were allowed entry under Judith Knight's instructions through a secret panel that was opened for selected participants (Cult Grooming). The technique also included climbing over walls with ladders and dropping off the other side (8 feet) whilst blindfolded. Also moving through tubes (3 feet diameter) where bodies became stuck in the chaos and desperation. Sometimes the 90 degree heat in summer along with fainting screaming and urinating in the tubes made this unbearable.
- (h) **"Wine Ceremonies"** These sessions involve more than 12 hours nonstop binge-alcohol night-club events that lasted until dawn. Devotees are often threatened and humiliated. Reformed alcoholics are told to drink. Judith knight has been videoed in at least one such ceremony using religious, racial and violent hate speech.
- (i) **"Pipe Tobacco Smoking"** I have seen and posted videos to YouTube which show participants being encouraged to smoke pipes during the Ramtha Wine Ceremonies often from dusk till dawn.
- (j) **"Pagan Dance"** Dancing till exhaustion to loud music wearing a facemask of an Animal.
- (k) **"Candle Focus"** Sitting for up straight with no movement to 8 hours starring at two candles on stage. Participants are woken if they fall asleep.
- (l) **"Rock Work"** Participants sit blindfolded for many hours attempting to push a rock into the top of their skull to direct lower energy upward through the chakras (a yoga term meaning any of the seven major energy centres in the body) to an expanded state of consciousness at the top of the head. This was done to very loud music with Judith Knight shouting push push and hold...!! Many participants would bleed from the top of the head. I was always left with thundering headaches which were explained

away as consciousness expanding to overcome pain and awaken the kundalini (the vital force lying dormant within one until activated by the practice of yoga, which leads one toward spiritual power and eventual salvation).

- (m) **"Drinking Lye-Sea Water "** Devotees were instructed to drink a "secret" formulation promoted by Judith Knight as a magical healing elixir of life and enhancement to enlightenment. The concoction of Dead Sea water mixed with Red Devil Lye tasted awful. This dangerous practice has been reported in the news **[CB]** and reported to the authorities by a medical doctor **[CB]**

72 Discipline was enforced by Cult guards who were called the "Red Guards" and/or "the Generals". The Red Guards enforced what was like a military style boot-camp environment. Extreme bullying tactics were common place with physical assaults, threats of expulsion (without a refund) if Ramtha or the financial schemes (discussed in more detail below) promoted by Judith Knight or her teaching techniques were questioned. Often Judith Knight as Ramtha would verbally abuse individuals which was regarded as a mark of significance and "higher teaching" from Ramtha.

73 The Cult explained that these techniques were necessary to help one overcome the physical and mental limitations of our human emotions, fears and judgments to become spiritually enlightened.

74 I myself experienced extreme exhaustion, disorientation, thundering headaches, and other ailments including deep psychological harm.

75 Many people suffered physical injuries, such as broken bones, and nervous breakdowns. The techniques were extremely exhausting and disorienting and had the result of placing me into an altered state of consciousness. In this state my normal psychological defences were broken down. Assisting any of the members injured during the techniques resulted in immediate expulsion without a refund.

76 I became susceptible to suggestion and manipulation. I have since learnt that the techniques used by the Cult are commonly used by Cults to create an atmosphere of coercive persuasion or "brain washing" **[CB]**. These techniques had the effect of:

- (a) keeping me unaware that there was an agenda to control or change the me and my thoughts;
- (b) controlling time and physical environment;
- (c) creating a sense of powerlessness, fear, and dependency;

- (d) suppressing old behavior and attitudes;
- (e) instilling new behavior and attitudes; and
- (f) putting forth a closed system of logic.

77 I understand now the nature of brainwashing influences also known as Social Engineering and Thought Reform. These are modern terms to describe cultic practices that systematically breakdown and destroy critical thinking resulting in defenceless reasoning. It is an imperceptible process which I experienced, where family bonds and outside links to society are methodically destroyed

78 By way of clarification, there are some that were developed after I left the Cult. The promotion of binge-alcohol abuse shown on the videos, posted by me on YouTube, was not part of the Cult's practices at the time I was a member.

79 I eventually came to believe that these techniques were a form of physical and psychological abuse and that the Cult had interfered with and manipulated my ability to perceive and think clearly and critically. I left the Cult in 1995.

80 I attended one more Cult event in 1998 as a guest 'music director' to celebrate Judith Knight's Birthday. It was then I witnessed first-hand the Wine Ceremony practices at the Cult with Judith Knight seated on a high altar drunk playing God. I remember feeling physically sick and bewildered at the sight of a thousand drunken devotees bowing their heads in homage to Judith Knight/Ramtha. I recognised in that moment a dangerous and pathologically narcissistic cult leader and charlatan. I swore never to return no matter the cost.

81 My time in the Ramtha Cult resulted in a form of psychological and emotional rape, a systematic breaking down of my sense of morality, ethics and compassion for the wellbeing and safety of others. I have since researched Cults and developed an understanding of how they work. As a result, I have a better understanding of what happened to me in Yelm at the hands of Judith Knight.

82 Needless to say, although I was a member of the Cult for seven years, I did not achieve the enlightenment that I was promised. In fact I left the Cult broken, still penniless and psychologically damaged. By that time, Maggie had divorced me and remarried.

1993 COP

83 In November 1993, while I was still a member of the Cult, I apparently signed the 1993 COP. I say "apparently" because I do not remember the terms of this document as containing anything other than a release of liability for injuries. At

any rate, the 1993 CoP was not a valid contract when I signed it, because the Ramtha School of Enlightenment was not a legal entity at the time.

84 As far as I can tell the 1993 COP discovered by the Plaintiffs appears genuine, and the date corresponds with what I am about to describe.

85 I recall that the 1993 COP was presented to members, including me, one day as we lined up outside the main arena in front of a security booth that had a window with a slot for payment of money. It was common practice for hundreds of members to line up outside for various reasons all day. On this day the weather was very cold and damp. In addition, the line was unusually long and slow because we were all being asked to sign a document.

86 Word filtered back to me that people were being asked to sign a document releasing the Cult from liability for injuries, or they would be expelled from the compound.

87 It was common knowledge that many followers were hospitalized during a recent event and a friend of mine had broken her ankle during the previous event. So, the document presented that day came as no surprise. What was bewildering, was that I was told unless I signed the 1993 COP, I would immediately be expelled from the Cult.

88 Prior to this date I had never been asked to sign any such document and so far as I can recall, I never signed any other.

89 At that point I had already dedicated four years of my life as a fulltime member, decided to give up my family and life in New Zealand to attend what the Cult had advertised and represented was a seven year course. I thought I had only three years to go before I could graduate to "enlightenment" and return to my home and family.

90 By the time I got to the window and the document was pushed through the slot, I was cold and exhausted from waiting on line all day and signed the document without reading it.

91 I understand the terminology used in this document to refer to the techniques described above, and I understand "teach" to mean that I should not attempt to set myself up as a teacher who could supervise such techniques.

92 It was certainly never my understanding that participants were not free to discuss anything that ever happened at the compound. On the contrary, we were specifically encouraged to share our experiences with friends and family, so as to recruit new adherents to the Cult.

- 93 In this regard Bettye Johnson, Jean Handley and Suzanne Nichols who are well known members of the Cult have written a number of books inspired by what they have learnt at the Cult.
- 94 In an article published by Steven Wyble of the Nisqually Valley News Suzanne Nichols has been reported as saying that the School's (Cult's) teachings encourage students to share their knowledge **[CB]**. For many that takes the form of publishing books.
- 95 Indeed Judith Knight has published many books and CDs that are available to the general public that set out the Cult's beliefs. The most well-known book is nick named "The White Book" which like many of the others is alleged to have been written by Ramtha. Of course the true author and the one to whom the copyright is claimed to belong is Judith Knight.
- 96 Books written by Judith Knight are available through the Cult's online store called "Quantum Café" **[CB]** and various other outlets such as Amazon **[CB]**. Titles that are available to the general public including some electronically) include:
- (a) Ramtha: The White Book (purported to be by Ramtha);
 - (b) The Mind Gladiators of the Future (purported to be by Ramtha);
 - (c) Love Yourself into Life (purported to be by Ramtha);
 - (d) A Beginner's Guide to reality (purported to be by Ramtha);
 - (e) Ramtha Intensive (purported to be by Ramtha);
 - (f) Jesus the Christ (purported to be by Ramtha);
 - (g) Parallel Lifetimes (purported to be by Ramtha);
 - (h) Ramtha;
 - (i) That Elixir Called Love (purported to be by Ramtha);
 - (j) When Fairy Tales Do Come True (purported to be by Ramtha);
 - (k) Who Are We Really? (purported to be by Ramtha);
 - (l) Buddha's Neuronet for Levitation (purported to be by Ramtha);
 - (m) Forgotten Gods Waking Up (purported to be by Ramtha); and
 - (n) Ramtha: An Introduction; and Ramtha, Last Waltz of the Tyrants (purported to be by Ramtha).

97 The Cult's online store advertises many other books and merchandise including CD's DVD's children's books clothing and posters. One of the 8" X 10" posters **[CB]** features a seductive photograph of Judith Knight bearing the text:

"Stay Excited! I Have Always Been a Millionaire."

98 The message conveyed in this poster is consistent with other promises made by Judith Knight to me (and other Cult members and prospective Cult members) of becoming wealthy through membership of the Cult and investing in various schemes. The only scheme called "Omega" that I invested a spare \$USD100 in resulted in its loss and certainly no wealth. In my experience the only person that has become truly wealthy through the activities of the Cult is Judith Knight herself.

Leaving the Cult

99 I eventually left the Cult after I was unable to raise the \$USD1,200 fee required to attend an event. By that time, I had come to realise that all of the promises made to me and which convinced me to join were empty. I realised that the Cult was all about money. Those realisations gave me the strength to break free and that I did. The process was not easy and I continue to feel traumatised by what I experienced at the hands of the Cult.

100 After leaving the Cult, I became an outspoken critic of it. I held cult-recovery workshops and seminars concerning cults in the Yelm area. My reporting and criticisms of the Ramtha Cult and Judith Knight were also reported in the media.

101 I have also contacted US Government authorities about my concerns.

102 There is no formal organization called "Enlighten Me Free."

103 In 1997, I created the "Enlighten Me Free," website (currently at URL www.enlightenmefree.com, commonly referred to as "EMF") devoted to debunking the Ramtha Cult and Judith Knight.

104 The EMF website provides resources and a forum to those who were involved with the Cult or were recovering from their involvement, or who had friends and families that were involved or recovering. The EMF website features an "Enlighten Me Free Message Board Forum," **[CB]**.

105 The message board forum is moderated, primarily for former Cult members and concerned friends and family. My website banner reads. *"This Website and Forum has been created by former members of RSE to make public the destructive, deceptive and illegal activities regarding JZK Inc & JZ Knight at Ramtha's School of Enlightenment (RSE. Inc)."* **[CB]** The only sense in which one can "join" EMF

is to register to view or to post messages. Approval is automatic, although it can be withdrawn if codes of civility are violated.

106 Although I operate the website openly under my own name and post to the message board under my own name, the sign-in system permits people to "join" the message board under pseudonyms. Many people have used pseudonyms to protect their identity so fearful they are of the Plaintiffs. That fear is understandable given the Plaintiffs' reputation for litigation and retribution against their critics that is well known.

107 Messages have been posted, often anonymously, both by persons who indicate that they are former students of the Cult, and those who have never been students such as concerned friends and family. The messages are replete with criticisms of the Ramtha Cult as a manipulative cult that subjects its members to both physical and psychological abuse. Because EMF has become a forum for exchanging and presenting critical information to the public concerning the Cult, I have promised readers that they can submit information to me anonymously concerning the Cult. I frequently receive messages from persons seeking to share information with me and frequently for publication on the EMF website. I have thus received evidence of numerous conditions and circumstances that I consider unsafe and illegal, including the matters that were the subject of the YouTube videos discussed below.

The Plaintiffs' object to my criticisms and reporting of them

108 I have been an outspoken critic of JZ Knight since 2006, reporting relevant news and information to people who could be harmed by the illegal activities at the Cult, including the general public. I started EMF in 2007. At that time, I posted a number of anti-Cult YouTube videos. These YouTube videos included short extracts from Judith Knight's copyrighted videos. These anti-Cult videos were very critical of Judith Knight and Cult abuses. These EMF videos also displayed illegal acts, which affected the public interest. They remained on YouTube for about six years, without Judith Knight objecting, even though they contained copyrighted material.

109 After I organized a local meeting to speak out against the cult, Judith Knight reported to a local Newspaper that "*I was an illegal alien not paying my taxes*" and falsely accused me of making money from criticizing her cult. I have never made money nor asked for a penny throughout all my efforts these past ten years of supporting the cults victims, or reporting about the cult and Judith Knight's destructive activities **[CB]**.

110 Judith Knight has been fully aware of all of my anti-Cult activities throughout these years. She did not contact me nor bother me about my anti-Cult activities in any

way during this time even though I was using Cult copyrighted video segments to create my "enlightenmefree" videos.

- 111 Judith Knight did not take any legal action against me until I released "Behind the Mask" in October 2012, during an intense local political campaign season. Accordingly, I believe that the Plaintiffs' claim is in part politically motivated.
- 112 In 2012 Judith Knight tried to involve herself in local politics, by making large campaign donations and hosting a candidates' forum at the Cult compound **[CB]**. Only two candidates attended. One of the candidates was the local Thurston County commissioner Sandra Romero the same commissioner that had ignored my EMF letters sent to her office detailing Fire, health and Safety concerns at RSE in 2010 **[CB]**.
- 113 I read in the local newspaper that both candidates, including Sandra Romero, were privately and publicly criticized for accepting Judith Knight's invitation. After the release of my "JZ Knight Behind the Mask video," the public criticism reached a fever pitch. I understand that candidates who had received campaign donations from Judith Knight (including Sandra Romero) ended up giving the donation money they had received from the Plaintiffs to charity. Sandra Romero, made the following statement in the local newspaper, after viewing my enlightenmefree video, "JZ Knight Behind the Mask" **[CB]**:

"Unlike the other videos that were heavily edited, spliced and taken out of context [This is in reference to Virginia Coverdale and Glen Morgan's YouTube videos which I have referred to earlier] this most recent one appeared to be un-doctored. I am appalled by Ms. JZ Knight's outrageous anti-Mexican, anti-Catholic raging. These vile, racist, and divisive comments against responsible and caring people have no place in Thurston County, or anywhere else. I am particularly stunned by these anti-human rights comments from her, because of her otherwise very positive record of supporting scholarships for RSE members/customers in the Yelm area, her support for positive environmental organizations and policies, her support of local social service agencies and her significant contributions to the economy in southeast Thurston County. However, these hateful comments are the complete opposite of everything I stand for. I denounce them. I condemn them."

- 114 My video "Behind the Mask" dashed JZ Knight's hope of ever earning respectability in her home county, and ever being part of an elite political inner circle. These were things that all of her money could not buy.
- 115 My "JZ Knight Behind the Mask 1 of 4" video proves that Judith Knight:

(a) Breaks Washington State law by fraudulently inducing her customers to buy her goods and services by:

- (i) **Fraudulently** stating that a major corporation "3M" is a client of her financial consulting services;
 - (ii) **Fraudulently** claiming that a team of international scholars had proven that she was actually channelling an all-knowing spirit named "Ramtha,"; and
 - (iii) Claiming that her customers should buy goods and services based her channelling of "Ramtha's" wisdom;
- (b) broadcasts violent anti-Semitic, homophobic and racist hate speech; and
- (c) encouraged her students/customers to break laws, (involving violations of state laws for Smoking and Alcohol consumption).

116 In September and October of 2012, I posted on YouTube the "enlightenmefree" videos that are the subject of this proceeding, that is to say the five videos described and listed in paragraph 13 of the Statement of Claim. In all of the postings, viewers were directed to the enlightenmefree.com website for further information about the Cult.

Video (a)

117 In the video "Fire, Health and Safety Violations at RSE Video 1 of 3" I have taken just under 5 minutes of extracts taken from an event in the assembly hall which clearly shows overcrowding and clouds of smoke generated from pipes that Judith Knight encourages devotees to smoke. There is so much smoke visible in the arena that either the smoke alarms have been turned off or are defective.

Video (b)

118 In the video "Fire, Health and Safety Violations at RSE Video 2 of 3" which is just over 13 minutes in length, Judith Knight is addressing the children/teenagers in attendance at an event within the Cult compound, who are shown on the video. Judith Knight boasts about RSE having gotten a "bad reputation," which is a good thing, because "you can do anything now, nobody cares." She contends that she has become part of the local "culture," and that people in the area are happy that so many people attend RSE because "your parents" buy so much wine, i.e. boosting the economy. She makes fun of the town of Yelm, among other things because it is so small and because the locals go to church. At one point, there is a clip of children being marched around while blindfolded and duct-taped. Stills of Judith Knight on the arena stage are displayed, with captions indicating that she is

drunk. Knight smokes a pipe, and encourages everyone to "light up," and people lighting pipes are shown. The room is full of smoke, and captions point out that the fire and smoke detectors have been turned off. At one point, while lighting her pipe, Knight comments that she has had "three bottles of wine, and can still do this" i.e. light her pipe – but a moment later she checks with someone onstage and corrects herself, saying she has had "five bottles" of wine. People are shown lifting their bottles of wine and toasting her. The video then pans over the arena, full of sleeping students, while a caption states: "As many as 2000 students/Sleep in the RSE Arena/Oftentimes Drunk," and then "Packed into a modified Horse Arena with Blocked Exits and Hallways" and then: "Smoke and Fire Alarms Disabled/--A Death Trap --/Thurston County Officials Have Turned a Blind Eye for Over 12 Years" and then: "JZ Knights (SUP) "Special Use Permit SUP 95-007 to Operate a Fraternity Lapsed February 2000." The video then scrolls the text that was also shown on the YouTube website, namely:

"Brought to you by Enlightenmefree.com. Thurston County commissioner Sandra Romero was notified of these violations over and over again for two years and even as recently as this month and she still proceeded to speak at RSE. JZ Knight is Sandra Romero's largest campaign donor."

- 119 The text on the YouTube page continues, and amongst other things contains a hyperlink back to the EMF website, including copies of complaints that were sent to local and state officials concerning alleged violations at RSE. The text also contains a hyperlink to a comment on the EMF Message Board discussing the fact that Judith Knight had donated \$120, 000 to the Thurston County Fire Department while it was experiencing a severe budgetary shortfall, which is hyperlinked to Judith Knight's own press release touting the gift. The YouTube text comments that "[a]side from the abuses inflicted upon attendees through the methods used at RSE, we assert that there are grounds to expose, or otherwise pursue safety issues as they relate to the RSE School Facility, and we believe that it would be irresponsible on our part not to do that."

Video (c)

- 120 The Video "Sandra Romero speaks at a local Cult" is just over 8 minutes long and contains extracts of the videos referred to above plus footage of Sandra Romero speaking to devotees at the arena.
- 121 In superimposed text it is noted that "JZ Knight is Romero's biggest donor." It complains that the RSE Arena is an overcrowded fire trap and that Romero had been notified and done nothing. Romero is shown discussing her concern for the "most vulnerable," and for "our children and grandchildren," while clips are juxtaposed of children at RSE being marched around while blindfolded and duct-taped. A portion from the video discussed above is shown, where Knight boasts to the children about how RSE "can do anything, nobody cares anymore." The video

concludes by claiming that RSE members are brainwashed, are part of a doomsday cult stockpiling food and weapons. It warns that a tragedy is likely to occur at the Cult.

- 122 The video also shows Judith Knight making obscure threats to people who wish to "argue" with her, that she can "drop the lodestone of manifestation into your life," and claims to be able to do to "governmental authorities" as well.

Video (d)

- 123 The Video "Sandra Romero Seeks Voters from a Cult" is a shorter version of the video described above and is only six and a half minutes long.

Video (e)

- 124 The video "J Z Knight talks about Mexicans" is just under three minutes long and show Judith Knight purporting to channel Ramtha. She abuses Mexicans in the most appalling way, including by stating that they *"are not worthy of conscious thought"*.

Other Videos

- 125 Videos (d) and (e) which I posted on YouTube borrowed footage that Cult had itself posted to YouTube for public viewing. During the 2012 campaign, the Cult hosted an event supporting local Democratic candidates, including Commissioner Sandra Romero, and the Cult posted a video of that event on its own YouTube channel, titled "JZ Knight on 2012 Election, the Republican deception of 2010, and her support for Democrats." As far as I know these videos are still available for viewing. I created two (very similar) videos that intercut and juxtaposed Knight's comments supporting Romero, and Romero's own comments, with segments from the "Fire, Health and Safety" videos discussed above. I posted both in October 2012.
- 126 On 18 October 2012, a video that has been attributed to Virginia Coverdale ("Romero, Wolfe Protect Ramtha Cult," ("**Coverdale Video**")) was posted. I did not create or post the Coverdale Video. The Coverdale Video also juxtaposed Romero's speech at RSE with clips of Knight, but in this case the clips are of Knight raging in foulmouthed terms (and gesturing obscenely) against Catholics, *"homosexual priests"* acts of homosexuality in general, and makes a reference to *"a fucking Jew"*. The captions question whether Knight is anti-Catholic, homophobic, and anti-Semitic, and question why Romero would refer to Knight as a *"spiritual leader"*? The video questions whether these are Thurston County's values, characterizes Romero as *"bought and paid for"* by Knight, and states that Thurston' County's values are *"not for sale"*.

- 127 In the ensuing media and political furore, “a spokesman for Knight and [RSE]” was quoted in *the Olympian* [CB] as claiming that the “comments were taken out of context and were in reference to the paedophile scandal involving Catholic priests.” It was partly in response to the claim that Knight’s remarks were taken out of context that I posted the video on October 28, entitled “JZ Knight Behind the Mask Part 1 of 4”. It shows more context to the anti-Catholic statements excerpted in the Coverdale Video. In many respects the video is similar to the “Fire Health and Safety” and “Romero” videos discussed above. It also shows Knight making what the video characterizes as abusive comments addressed to her staff and/or to members of the audience. The video shows Knight making various claims to have had independent scientists verify her “channelling,” to which the video responds with contrary statements. The video shows Knight generally warning of an imminent nuclear war to be started by the “teenage” leader of North Korea.
- 128 The posting of these videos on YouTube created an immediate political and media furore. Republicans called for Romero and other Democrats to return any money they had received from Knight. I refer to articles in the *Olympian* describing the public exchanges on the subject [CB]. At first Sandra Romero refused to do so, but as a direct result of my posting the “JZ Knight Behind the Mask Part 1” video, she changed her tune, and released the statement I have referred to above
- 129 As shown in the press reporting, Romero eventually announced that she would donate all money received from Knight/RSE to charity, as did her fellow Democratic candidates as well as the local Democratic Party itself.
- 130 In order to silence Virginia and me the US proceeding was commenced and the Plaintiffs arranged for YouTube to remove the videos I had posted from the internet.
- 131 On 1 November 2012, I wrote, under my own name, to the Cult [CB], demanding that they produce the contract upon which they were relying in the US proceeding. (At the time I did not recall that the document I had signed in 1993 was anything other than a release of liability for injuries.) The cult immediately acknowledged receipt of the communication, but did not otherwise respond to this or subsequent communications from me, until it filed and served (on February 22, 2013) this proceeding in New Zealand [CB].
- 132 I also promptly identified myself as the poster of the videos in response to Digital Millennium Copyright Act (DMCA) take-down notices sent by Plaintiff to YouTube.
- 133 However, YouTube refused to honour my counter notification on the grounds that it had been served with the Court’s injunction that was obtained in the US Proceeding [CB]. YouTube has, without further explanation, blocked my access

to my own YouTube account, preventing me from being able to post any videos to YouTube. YouTube has now suspended my account effectively shutting down 12 other EMF Videos.

The Claim That I have Induced Others to Breach the 2007 COP

134 I deny that I had any knowledge that people might breach a contract with the Plaintiffs by sending me videos to post on YouTube.

135 Certainly I did not encourage or induce anyone to breach any contract. All of the information and videos that have been sent to and been used by me were sent voluntarily via my EMF website.

136 On her videos, JZ Knight repeatedly states that she is aware that there are unauthorized viewers of her livestreams. Based on Knight's own statements, Plaintiffs have no reason to believe that whoever recorded the livestreams had signed the 2007 CoP.

As stated above, the website is available for anyone to use. Indeed, the Plaintiff's main witness Mike Wright has posted on the EMF forum.

The Plaintiff's Briefs

137 I now respond to the briefs of evidence that have been served by the plaintiffs below.

John Michael Wright

138 I do not remember meeting Mike Wright during the time that I participated in the Ramtha Cult. However, I have come to know Mike and his involvement with the Cult through the US Proceedings and postings he has made on my EMF website.

139 I now respond to Mike Wright's brief by reference to his paragraph numbers (to the extent that I have not already done so in the first part of my brief). I have not responded to every issue raised in Mike Wright's affidavit and my failure to do so does not necessarily constitute my agreement with anything I have not responded to.

140 The non-profit corporation "Church I AM" was dissolved on 15 April 1998 after a unanimous resolution by its members including Judith Knight [CB] not 1994 as stated by Mike Wright. There was no mention of anything to do with Ramtha or RSE in the Church I AM documents in the Washington State Archives.

- 141 In the seven years that I was a member of the Cult, I do not recall any fire drills, fire emergency evacuation plans or instructions posted on the walls of the arena, notwithstanding that there were, at times, up to 2,000 members sleeping in the arena.
- 142 As stated above, I was not asked to sign a CoP Agreement when I joined the Ramtha Cult.
- 143** The 1993 COP which I signed in 1993 did not refer to dissemination of information or techniques. Although I understood the 1993 COP to be a waiver in respect of responsibility for injury or loss suffered by participants, I accept that it states that I was not authorised to teach what I learnt at the Cult to others. Nevertheless, I reiterate that I have never taught anything that I have learnt at the Cult to anyone else. Knowing what I do now, means that I will never considered (or attempt) to teach what the Cult teaches to its devotees to anyone. At any rate, the Ramtha School of Enlightenment was not a legal entity at the time I entered into this purportedly valid contract.

Paragraphs 90 to 93

- 144 During the period in which I attended the Ramtha Cult, unscheduled evening events were commonplace. I understand that they still are.
- 145 Usually, one day's notice was given via the "grapevine" with a message along the lines that "Ramtha has called an event".
- 146 Fees for such events were \$40 cash which was paid on entrance.
- 147 I recall that the unscheduled evening events were usually related to Doomsday predictions or extra special teachings.
- 148 These events were often held once a week depending on whether or not Judith Knight was on a shopping vacation in the south of France.
- 149 Some of the events entitled "manifesting evenings" were common in the early years. During these evenings, participants would be blindfolded and hyper ventilating (C & E breathing technique) to very loud music whilst Judith Knight (as Ramtha) would drop large amounts of cash (\$5,000 or more) into the laps of chosen members.
- 150 During my seven years at the Ramtha Cult, I estimate that I would have attended over 100 of these unscheduled evening events, paying cash each time.

Paragraphs 100 and 101

- 151 I agree that I have made a number of allegations regarding what I regard as breaches of local fire safety regulations. I have seen, through discovery, material that has been touted as evidence of compliance with regulations. My criticism is that the Ramtha Cult does not disclose the true business that it conducts within its compound and that the permits that have been granted are more applicable to a horse riding business as opposed to a "school". In this regard, I note that the permits that were issued in 2011, 2012 and 2013 have been issued to the "Messiah Ranch – not the "Ramtha School of Enlightenment". Accordingly, whilst the Ramtha Cult may be complying with the permits that have been issued, Thurston County public records give evidence that the permits that have been obtained by the Cult are not applicable to the business it conducts there. I also consider that it is relevant, that the Cult has made large donations to the Southeast Thurston Fire EMS.
- 152 In addition, the extracts of the videos that I posted on YouTube provide evidence of unsafe practices including smoking in a public place, and public drinking and intoxication, which are all prohibited in Washington State **[CB]** as well as overcrowding and drunkenness in a confined area and smoking in a public place **[CB]**.
- 153 In fact, Wright’s EMF own posting provides the very evidence needed to prove that my EMF video statements are true, where I stated that the fire suppression system at the Ramtha cult are disabled during events. Wright’s 2013 EMF posting clearly disputes the 2012 Thurston County Commissioner hearing transcripts (in JZK’s supplemental discovery) about smoke alarms at RSE, and also disputes fire code requirements about whether the fire suppression system can be “turned off” or impaired. Fire code requires that an assembly building’s fire suppression system be able to be turned off or “impaired” by the building’s owner, and that each building is required to have an “impairment coordinator.” Also, fire code says that the suppression system needs to have fire alarms that are smoke detectors. Thurston County management states that RSE does have these smoke alarms, and that they were operating when tested during inspection.
- 154 On EMF, however, Mike Wright states that RSE does NOT have alarms, and that RSE is NOT required to have these smoke alarms, by code. Wright also stated on EMF that there is nothing to be “turned off.” But the fire code requires that the system be able to be “turned off” by the building’s owner.
- 155 Because Mike Wright lied about these two critical points in his EMF post, that gives sufficient evidence that I was right about the fire system being disabled. I never doubted that RSE had a fire suppression system. I stated that it was turned off during events, needlessly endangering the lives of people who mistakenly believed

that these safety measures were in place. Mike Wright's EMF statements provide the necessary support to prove that I was right.

Own Paragraph 117

156 I accept that I became aware of the 2007 version of the COP prior to posting the videos on YouTube. However, I was not aware of who had signed the 2007 CoP nor whether the persons who had supplied me with videos were bound by that document. Furthermore, I was not aware of what its terms meant. I reiterate that I never encouraged or induced anyone to breach the 2007 COP.

157 JZ Knight repeatedly states on video that she is aware that there are unauthorized viewers of her livestreams. Since she is aware that there are unauthorized viewers, neither she nor JZK can assume that whoever recorded the livestreams was an authorized viewer, who had signed the 2007 CoP.

Paragraph 120

158 I deny that my purposes for posting the videos is as simple as Mr Wright states in paragraph 120. I have made it very clear in my posted videos that my purposes include:

- (a) That that Judith Knight and County officials be investigated for fraud and corruption resulting in gross breaches of Fire Health and Safety Regulation at RSE for the past 12 years, with blatant disregard and indifference for the safety and wellbeing of RSE Students.
- (b) RSE Needs to be Shut Down Now before a Major Tragedy Strikes and Lives are Lost. Evidence provided by Mike Wright on EMF proves that I had every reason to believe that tragedy could occur as a result of the fire suppression system being turned off in the presence of massive illegal smoking and intoxication in a crowded arena, where babies, small children, and elderly people are present.

Paragraph 141

159 In Paragraph 141 of his brief, Mr Wright alleges that I have attempted to intentionally misrepresent Ramtha. To the contrary, my point is that Judith Knight and other members of the Cult misrepresent the Cult to prospective beginners and induce them to become members under false pretences. Virtually none of the promises made to me, and which I have referred to earlier in my brief, by Judith Knight in 1989 and subsequently, were ever fulfilled. Instead, I have suffered

irreparable harm, I have seen others suffer irreparable harm. I believe that the harm caused has on some occasions resulted in suicide [CB].

Paragraph 142

160 I have not attempted, in posting the Cult videos on the internet, to interpret the Cult's teachings in any way. Indeed none of the extracts that I have posted on the internet purport to teach anything to anyone. I created and posted my videos to report dangerous and illegal activities to the public, who could be harmed by these activities.

Kirk Bernard Diaz; Marguerite Carolyn Rae, Joanne Grosvenor-Handlan; Marita Rose Bott and Lynda Anne Prescott

161 I do not have any specific responses to the other draft briefs that have been served by the Plaintiffs except to say that I am aware that there are many devotees of the Ramtha Cult that continue to belong to it and blindly follow its leader Judith Knight

162 That said, I do not resile from my evidence. What I have experienced has been mirrored by many others who have left the Cult including many of those who have posted on my EMF website. Some of those who have been affected have agreed to give evidence in this proceeding.

163 I know what I experienced whilst I was captivated by Judith Knight and Ramtha who I now know is simply a figment of Judith Knight's imagination.

164 As a former Cult member and a citizen journalist, I have the right to report what I know, if my reports meet the criteria of news reporting in both the U.S. and New Zealand. My EMF videos met that criteria in both countries, because they displayed proof of multiple illegal activities, that could have a very significant negative impact on the public, particularly on the citizens of Thurston County, Washington, USA.

165 I have collected a vast amount of verifiable, objective evidence to support my defence against Plaintiffs' claims, which I am prepared to submit.

DATED this 8th day of May 2014



Signature

D E McCarthy

