

I, Jxxxxx Mxxxxx, declare:

I have known of Defendant J. Donald Waiters for approximately 41 years. For about four (4) or five(5) years I have personally associated with him, culminating in a close friendship. I make this declaration of my own personal knowledge and if called upon to testify in a court of law could and would do so competently.

I have known about Mr. Waiters, self-entitled "Swami Kriyananda" ("Kriyananda"), since I was a teenager, for about 41 years. When I was much younger, my mother would hold church meetings for the Self-Realization Fellowship Church ("SRF") in our home and I knew that Kriyananda would give sermons at our house occasionally as an SRF minister.

When I was seventeen, I became a renunciate, e.g., a nun, at Mount Washington, the Mother Center for SRF. I eventually left Mount Washington due to ill health, but kept in contact with one of the other nuns at Mount Washington who was a close friend. This nun gave me a glowing report about Kriyananda. Kamala Silva, a minister for SRF who was a dear friend of mine and almost a surrogate mother, also commented to me that Kriyananda had started a community for Paramahansa Yogananda. So before I even knew him personally, I was given the impression by others that he was a reputable, clean-living, spiritual person.

I first came into direct contact with Kriyananda in the early 1960's when he came to visit me at my apartment right after he was dismissed from SRF. He apparently got my telephone number from my mother and we visited for a couple of hours. Sometime in 1966 or 1967, Kriyananda telephoned me one day and said he had found this property up in Northern California. He asked me if I would be interested in joining him up there, "so we can find God." I declined the offer because I was very sick and because I knew that the primitive conditions in a new community could not accommodate one with muscular dystrophy.

My friendship with Kriyananda did not start, however, until Kamala Silva had a stroke and was brought by her husband to live at Ananda Village just outside of Nevada City, California ("Ananda") so that she could be cared for full time. I believe this was during 1991 or 1992. I had never visited Ananda, but I had heard that it was a nice community. I visited Ms. Silva on several occasions but telephoned almost daily to keep up on her progress.

On the initial visit, I brought gift baskets to both Kriyananda and his wife Rosanna to show my respect. Because I brought her the gift basket and we had never met, Rosanna wanted to meet me. Kriyananda and Rosanna then came down to visit me and Rosanna and I discovered that we had many things in common. My friendship with Rosanna developed from that point on.

I got to know Kriyananda's "inner circle" members and other Ananda members through the proverbial "grapevine" as I never lived at Ananda and never joined the church. For example, I got to know Devi because Kriyananda informed me confidentially that Devi and Joytish's son was taking drugs. That was my first call and was initiated by me because I had counseled adolescents at Juvenile Hall and thought I might help them. Someone else would then ask me to call another person who was upset or had other problems. Often they thought it would help if I just talked to the person they were concerned about. Thus, I got to know Jyotish and Devi Novak, Vidura and Durga Smallen, and other Ananda members mostly over the telephone. Initially, we would talk about whatever problems they were having at the

time and then gradually, we spoke of many other things on a regular basis. Haridas and Eileen Blake became friends with our family in a natural manner. They helped with Kamala Sil

va's care at times and we became personal friends. Haridas had been troubled for years about Kriyananda's sexual behavior and visited our home to discuss the seriousness of the situation at Ananda.

At the time that I met Rosanna, Kriyananda and his wife Rosanna were apparently having substantial difficulties with their marriage. Kriyananda knew that I was a trained counselor and asked that I assist him with his marital problems through counseling. At that time, I was unaware of any lawsuit between Kriyananda and SRF and didn't really know him personally. All I knew was that Kriyananda had previously been associated with SRF and what I had been told previously by my SRF nun friend, as well as Kamala Silva (previous SRF minister) in their favorable reports about him. I therefore agreed to counsel him regarding his marital problems. This informal counseling was the start of our close friendship.

When I first started to become acquainted with Kriyananda, he was on his best behavior. He appeared open to my criticism regarding his treatment of his wife. At the time I didn't recognize his narcissistic behavior although, when a teenager at SRF I had believed him to be eccentric. This was the beginning of his habit of telephoning me to discuss many personal issues that were on his mind. He appeared to see me almost as a sister as well as a confidante. I acted as his sounding board on many occasions, particularly when Anne-Marie's lawsuit bothered him later on during approximately January through May, 1995. He would thus call me regularly to talk about his wife, his marriage and many other subjects.

During this time, my friendship with Rosanna also continued to progress. One day when we were discussing Kriyananda and how he treated her, I said to Rosanna, "maybe he's not ready to be a husband because he still wants to be a monk he's impersonal." Rosanna responded in an abrupt manner, "He's not a monk, he's not impersonal." Later on, when I had gotten to know her better, Rosanna told me that Kriyananda had admitted to her that he had had sex with both Seva Wiberg and Kalyani Deranja when she confronted him on the issue. His affair with Kalyani had lasted for "years." As I had believed that as a "swami" Kriyananda was celibate, I was shocked. I immediately phoned Kriyananda, told him that Rosanna had admitted to me that he had had sex with Seva and with Kalyani for "years," and asked him if it was true. He admitted that it was.

However, as he had previously told me he "lived a clean life," I justified his conduct in my own mind, believing that these two affairs were anomalies or momentary lapses on his part. I was unaware at that time that Kriyananda habitually sexual encounters with members of the Ananda village over a period of thirty (30) years, a fact which is apparently common knowledge among Kriyananda's "inner circle."

Rosanna recently told me that she had seen Kriyananda's will when they were married and that he had left quite a few of his possessions to Seva and Kalyani.

Rosanna also told me that Kriyananda "played with sexual energy," that his eyes would light up when he saw young girls. For example, a girl named Barbara, who later married an Ananda member named Trip, had visited Kriyananda at one point. When he first met Barbara, Rosanna saw his expression change and his eyes "light

up." He kept eye contact for hours with her and was clearly fascinated with Barbara. Rosanna told me that she heard Kriyananda say under his breath on one occasion, "she is mine." Although they seemed to have normal sexual relations, Rosanna told me that she definitely suspected throughout the marriage that he had an underlying sexual problem, but could not identify it.

At the time that Ms. Bertolucci filed her lawsuit against Kriyananda, Levin and Ananda, I didn't know what Anne-Marie was claiming had happened or that Kriyananda had a sexual history with many female Ananda members. Kriyananda, however, must have assumed that Devi or someone else had told me about the claims in Anne-Marie's lawsuit because he started making comments to me about his sexual encounters and the case itself. At the time I didn't fully understand those comments, but they now make sense in light of the facts I have observed/ed and discovered since then by talking to various women, psychologists and members of Ananda regarding Kriyananda's sexual abuses. These comments sometimes occurred in the context of a conversation and sometimes would be made for no apparent reason. His comments would also be contradictory - one moment he would comment that everyone was lying and the next time he would admit that he had done some of what was claimed. I will try to set forth these comments in some reasonable order as best I can in this declaration.

After this lawsuit began, Kriyananda told me repeatedly that Anne-Marie Bertolucci ("Anne-Marie") was "insane" or "crazy," and that she was lying about the facts alleged in the lawsuit. He made the comment once that "all I asked her to do was massage my shoulders", and conveniently couldn't remember the movie she was referring to. He made similar repeated comments about the various women who have submitted declarations about their sexual intimacy with Kriyananda in support of Anne-Marie's case, e.g., that "all these women are hysterical, crazy" and that the women were all "lying."

Kriyananda also made specific comments about particular women. For example, he called me late at night several times and said "I just didn't appreciate the way Kamala [(Willey) came at me all the time." These random comments increased when he was particularly agitated about the progress of Anne-Marie's case. Later realizing this form of denial was a way of life for him throughout many years.

Kriyananda would also contradict himself. He would first deny his own fault in his sexual interaction with women at Ananda and then admit he had done something "wrong." For example, during one conversation, when he was very agitated about Anne-Marie's case, he complained to me about all the statements various women were making about his sexual involvement with them. Because I didn't understand at all that he had been sexually intimate with Ananda members beyond Seva and Kalyani, I thought he was over-dramatizing and tried to calm him down by downplaying the importance of his "problem." Kriyananda reacted in an angry manner, as if I had inappropriately made light of the situation, stating: "Janice, innocent people have been hurt", further contradicting a previous statement saying "I never thought I was hurting anyone." (an incomprehensible comment in light of the seriousness of his sexual actions)

Similarly, right after this lawsuit was filed and after repeatedly telling me that all the women were "crazy," "hysterical," and "lying," Kriyananda said to me "Janice, there's some truth in the declarations. I would hate to have the people close to me find this out in a courtroom. Should I tell them about my sexual problems? How should I do it I innocently believed, again, that by the words "sexual problems" he was referring

only to his affairs with Seva and Kalyani and told him only to tell the community what he needed to. ( I did not know then the facts he was referring to, and did not want him to have to broadcast all his faults to the community unless necessary.) When I later asked him about what he had told his close followers at Ananda, he said "I didn't tell them 'everything.'" Kriyananda also commented to me, again, regarding the issue of telling the community about his sexual "problems": "Janice, I would tell the people about my [sexual conduct], but if they kn!

ew this, that's all that they would see in me," not the "good" and "spiritual" work that he believed he did. Several months before the law suit began Kriyananda called me frequently, sometimes four to five times per week discussing anything and everything, including his failing marriage with Rosanna and after the law suit his sexual problems also. As I was a close friend of Rosanna's, who was then residing in Carmel, California, and he knew that I talked to her fairly often, he would call me to talk about her in the hopes that I would tell her something that would make her come back to him and Ananda. Kriyananda is also a lonely person and seemed to enjoy talking to me in a sister-confidante role. These conversations with Kriyananda included repeated discussions about his sexual problems as beginning after he left SRF Also his conversations with Yogananda about them when he was still in SRF. He would say to me, "I was mixed up after I was [kicked out] of SRF." Many of the statements repeated in this declaration came from the many conversations I had with Kriyananda during the period from November 1994 - April, 1995.

On February 21, 1995, Kriyananda's lawyer, Sheila Rush, asked me to sign a letter stating how wonderful Ananda and Kriyananda were in their cross complaint action and use with other women's statements for their defense. At the time, I reviewed the letter Sheila drafted and signed it. I was still unaware of Kriyananda's true sexual proclivities and had been convinced by him that Anne-Marie was lying. I intended that Sheila use the letter to support Kriyananda in his innocence, approximately one week later I began to find out the truth.

Although I still believed Kriyananda was innocent at the time of my letter, I had begun to suspect there might be something more to the situation. For one thing, I had noticed how various women at Ananda would look at Elizabeth Barrett, one of Kriyananda's masseuses during the past couple of years. I also had a strange conversation with Durga Smallen one day. Durga made a comment to me that because she had been sick recently, she had not been able to "give" Kriyananda any "energy" lately, in reference to the massages he needed. She then commented, "[w]ell, anyway, he prefers Elizabeth and she's there with him." I responded, "[o]h yes, Elizabeth's a healer." Durga commented rather cynically, "oh, I don't know about that, but Swami likes her." That was my first clue that Elizabeth was sexually intimate with Kriyananda.

Rosanna also commented to me that many community members had told Rosanna that it appeared to them, from the way Kriyananda and Elizabeth were looking at each other one day, that Kriyananda and Elizabeth were acting as if in love with each other. Rosanna had thought it strange, but didn't appear to take their comments seriously at the time.

One day soon thereafter, Elizabeth and I were talking about Rosanna and Kriyananda's marital problems. I made the comment to Elizabeth, "[w]ell, Kriyananda's a monk." Elizabeth replied rather strangely, "[h]e's not ready to be a monk, she repeated this several times to help me get the point. Far

better for all of us if he were." A little later on, when Kriyananda was "in seclusion" in Carmel, Elizabeth told me that she was thinking about going down to Carmel because she was "worried that Kriyananda isn't taking care of himself." I then realized that there must be something more to their relationship because none, except perhaps a wife or lover, would dare to visit someone who was "in seclusion." Finally, I bluntly asked Elizabeth if she was sexually involved with Kriyananda: "Elizabeth, I assume you've been intimate with him." She admitted that "yes," she had been sexually intimate with Kriyananda.

Rosanna later told me that Kriyananda had told her that Elizabeth Barrett "had helped [him] to withdraw sexually." He made a similar comment to me, e.g., that Elizabeth had helped him to "withdraw [sexually]." Kriyananda was quite upset that Rosanna would be alarmed about his sexual statement to Rosanna. I explained to him you have to be attracted in order to withdraw. He was then silent.

A short time after my letter was used the beginning of March 1995, I spoke to Denise Peterson about what Kriyananda had done to her. I also obtained copies of the various declarations filed by former Ananda female members who testified regarding Kriyananda's sexually using them. The final clincher was an interview with a psychologist who had treated several women who had been severely traumatized by Kriyananda's sexual actions with them. These women have not joined the case due to the severity of their trauma. From this reputable health professional I learned facts about women devastated physically mentally and spiritually from Kriyananda's evil actions. Some have not recovered completely. To put it mildly, I was shocked, horrified and angry that Kriyananda would use his power as the Ananda religious leader to obtain sexual gratification from the Ananda women members and his total lack of conscience. I was determined to discuss these issues with Kriyananda, find out more about the situation and try to convince him to cease this behavior.

After Kriyananda had open-heart surgery he said he was supposed to remain calm, Whenever I would try to bring the subject up in conversation, he would refuse to talk about it, saying that "I could die, I can't discuss this now." During another conversation, when Kriyananda was very distraught that Denise Peterson had contacted several persons at Ananda regarding his behavior, he compared his sexual conduct to that of an alcoholic, stating when]hen a person is an alcoholic, they don't bring these things up when they are trying to recover." But when I tried to continue the conversation, he refused again saying that talking could "kill" him and that he didn't want to talk about it. Kriyananda's response was particularly shocking after I spoke to Denise Peterson because he displayed no normal feelings of remorse or comprehension of the evil he had done. He asked me what she had wanted. I commented that she would like an apology. (Denise had not actually asked for this) Showing total narcissistic behavior he commented "That's easy enough, we don't want her to phone anyone else." In other words, let's stop her before the news spreads in Ananda.

When I raised the issue with Jyotish, Kriyananda's right-hand man, during this same time period, however, Jyotish commented that "it would probably be better if Kriyananda admitted to his sexual problems to the community, that he would feel better about himself to openly discuss the situation." Also they commented that they were unable to broach the subject because they said that Kriyananda didn't trust them enough and hoped that I would encourage him to tell the truth to his community. They also realized Kriyananda was blaming SRF and knew that this was not true. They were hoping Kriyananda would address the situation honestly instead of

diffusing into his us~usual false justifications. Jyotish did not take moral issue of Kriyananda's evil sexual abuse of women according to Devi. After asking several times if he took issue to be sure I heard her correctly, she assured me that he definitely took no issue. It is common in cults for one who subjugates himself to be "in tune" with his guru in "unconditional love" to replace his own natural moral values for the "holy" leader's values. Jyotish did not seem at all disturbed by Kriyananda's sexual conduct. Devi told me the only things that upset Jyotish were Kriyananda's policies in regards to community business and other such affairs. This consciousness was incomprehensible to me in lieu of the horrible actions by Kriyananda to innocent women who had revered him.

In March or early April, 1995, after he began to recover from his heart surgery, Kriyananda became very upset apparently because he found out that Crystal Clarity was in debt approximately \$700,000 - 800,000, perhaps more. This was in addition to the "stress" of defending against Anne Marie's case. Kriyananda told me that he had decided to go to Hawaii. One or two days after he told me he had had his secretary arrange his airplane tickets for his Hawaii trip, Kriyananda received a letter from a female Ananda member, Ananda Cornell. Mrs. Cornell's letter told him that she had been aware of his sexual activity for "years" and thought that Anne-Marie's case would "cleanse" him. It remarked about the confusion a woman would have by having sex with their spiritual teacher. She also commented if he had asked each woman for her forgiveness. Kriyananda became very upset from her mild criticism of him. Kriyananda apparently told his close friends that he was going to Hawaii to "recover" from this "terrible" letter that it finalized his decision to leave. (I knew, however, that Kriyananda's secretary had called to reserve his airline tickets to Hawaii one or two days before he received that letter as stated above.)

During a conversation sometime before Kriyananda left for Hawaii and while he was very upset about Anne-Marie's case, Kriyananda told me that originally he was going to leave Ananda permanently because his sexual "problems" would be brought to light. I assumed he meant that the Ananda community leaders would take great issue with his sexual conduct and he was afraid of what would happen if or when it became known. He commented that he had changed his mind, everyone who took issue could leave. Then for a second time decided he may leave for good, saying "I will not return unless Divine Mother tells me to return. He appeared to be having a temperamental outburst because of the debts of Crystal Clarity and the pressure and embarrassment of the court case with Ann Marie, and (he said) Anandi Cornell's letter. No one close to him seemed to take it seriously. (Right before he returned from Hawaii, none that knew him were surprised as he conveniently again decided to return, reiterating in an almost boasting manner "whoever (the Ananda community members) takes issue can leave, I am not going to leave."

On the day that Kriyananda flew to Hawaii, I went to the airport to privately try to talk to him about his using the Ananda women for sex, besides the horrible trauma that his victims had incurred. I knew that his denial was a betrayal of our spiritual teachings on all levels of understanding. Kriyananda, however, arrived at the airport already very late for his airplane and I was unable to speak with him other than to say goodbye. I did, however, speak with Sheila Rush after Kriyananda boarded his flight. Sheila appeared quite distraught and said in an almost shocked manner that Kriyananda "was not acting like himself in Palo Alto" as he was apparently very distraught over the Anne-Marie case. Sheila then said, "Janice, think of this, he told me he never used his will in these acts." From the context of the conversation, I knew she was referring to Kriyananda's sexually intimate acts with the various

women at Ananda. Sheila then continued, saying that she had asked Asha Praver what Kriyananda meant by that statement. Asha apparently replied to Sheila, "well, I guess it was beyond his control." Sheila had a bewildered expression on her face as she related that comment to me. Her expression and confused words showed typical behavior seen in cults. She was clearly attempting to replace her own knowing of what is decent and moral with the morally sick actions of her "guru". She then commented to me that Kriyananda was "her life"; meaning the center of her entire existence. We discussed Anandi's letter and I informed her that it was very respectful.

When Kriyananda was in Hawaii he spoke to me about the "terrible" letter from Anandi which he believed unacceptably criticized him and the topics raised by the letter. (It was his inability to accept even the most subtle, gently couched occasional criticisms which were scattered in this letter which was otherwise filled with praise that shocked me into the realization that Kriyananda's narcissism was acute and it seemed to me that even other acute personality disorders were being exhibited by him. He read to me several lines from the letter stating "that any women would have to be confused by having sex with their spiritual teacher" and that she hoped "that on an inner prayer level he had asked the women for forgiveness". He asked me what she meant by these statements and then commented "Janice, if this is true, then I must be a bad person" and also saying that then his whole life would then be "a mistake".

In context, I understood that he meant that if what the author of the letter was saying was true, then he would be a bad person. And since Kriyananda could not believe he was a bad person, therefore what she was saying was false. In other words, Kriyananda reasoned to himself that this woman was confused, that he didn't use his power for sex because that is what a bad person would do and everything good that he believed he had done at Ananda would then be worthless. This was the sort of tortured, twisted logic that Kriyananda followed. This same twisted logic was particularly apparent in the comments in the letter that he focused on, e.g., that this woman had been aware of his sexual behavior for many years, had always believed it was his own business, and that she didn't judge him for it. In addition, she had stated that she thought maybe Anne-Marie's lawsuit might "cleanse" him, and that she was concerned that the community may need to be informed on some level about his sexual activities because a few people had read the declarations. In other words, she didn't think it wise to attempt to cover things up and respectfully wanted to know what to say to the members of Ananda.

During this same conversation, Kriyananda began ranting and raving that all the women who had written declarations against him were "hysterical," and that he had been "blessing" them and "helping" them. Kriyananda's use of the term "blessing" to describe his sexual encounters with Ananda female members was as offensive then as it is now repeated on paper, but I bit my tongue biding for time in hopes to reach him, on some level, in a future conversation. In the shock of his horrid comments about "blessing and helping the women" and with the echo of their unbelievable trauma caused from Kriyananda (some, their lives still affected by his evil sexual actions) I wrote him a letter to address these issues and the total lack of normal conscience that I observed in his behavior.

At another point in the conversation, Kriyananda said, "I didn't use my will on them," meaning he didn't use his will on the Ananda women to obtain sex. Later phone

conversation , the same comment Sheila had told me he said.

Kriyananda then telephoned me again from Hawaii for my birthday in mid-April, 1995. We spoke briefly and I thanked him for the flowers he had sent for the occasion. I told him that I was sending him a letter and that he should not get too upset over what my letter said. I sent him the April \_\_, 1995( I actually forgot to date it) letter by express mail several days later. Kriyananda called me a day or two later in a very agitated and angry mood but denied that he had received my letter when I asked about it. Because of his continued snide and cutting comments and angry tone of voice throughout our short conversation, however, it was clear that he had in fact received it.

Kriyananda telephoned me again late the following night. He said he had received my letter and wanted to discuss it. He sounded much calmer than he had the previous night. We talked for two or three hours and until well after midnight. He also seemed to want to placate me and to somehow convince me to not be as angry at him as the tone in my letter had indicated.

He insisted that I had "turned against him" because Rosanna had "poisoned" my mind. He also tried to backtrack on some of the particularly offensive comments that he had made during previous conversations. For example, in my letter, I had criticized him for his claim that his sexual intimacy with these women was "blessing" them. With regard to his "blessing" comment, Kriyananda said, "oh, Janice, I didn't mean that, I was just trying to make it sound better."

Kriyananda took great offense to the statements I had made in my letter, even though I had tried to phrase things in a very tactful and inoffensive manner so as to try to help him understand rather than make him angry. He was particularly offended by my comments that it was totally improper for him to use his power and authority as the Ananda religious leader to obtain sex from the Ananda female members as he had been doing. I said to him, "you don't use your power to get sex. I commented that our spiritual teaching at SRF warned about using magnetism in this way and that. These women thought you were spiritual, they thought you were a God and you led them into this." He then laughed in a perfectly evil tone, and said in a detached, offhand manner, "well, that was their problem. I didn't force them. They should not have thought of me in that spiritual way." There was a total lack of conscience, regret or feeling in his words as well as his tone. I was horrified.

He further responded: "Janice, I went to religious teachers and I didn't act hysterical and crazy like these women. I became disillusioned with some religious teachers because they may not have agreed with me on certain things about my guru and other factors, and I didn't act like these women." I then said, "yes, but they didn't have sex with you." Kriyananda was silent after that comment. Our conversation obviously upset him and finally he said in a shaking voice, "won't you at least give me this, that these women were involved too". I responded, "well, I will say that it was their karma." I would not take part in assisting Kriyananda in his rationalizing away the blame for his sexually using these women.

Kriyananda also used his common excuse that he's "lonely" to explain his sexual "problems." At one point during our conversation, he became very upset and said "I didn't have a chance to work on myself until the 1980's." When I told him that he should have worked on himself before he became a religious leader so as to control his sexual urges, he responded "but I would have gone crazy...." I also told him that

I would have taken him to a psychologist years ago if I had known about the extent of his sexual "problems."

Our conversation continued. In my letter I had written that I didn't believe that Kriyananda's "problem" was sex. I was implying a much deeper, more sinister personality problem. He commented to me that I was correct on that matter saying, "yes, Janice, you're right." He appeared interested in what I had concluded actually was his "problem" but I never responded directly to this inquiry, but made several comments on his childhood and certain difficult times that he must have gone through. He had been sent away from home at the age of nine. I then told him a story about how when I was visiting my aunt in Seattle when I was three years old, my cousin had exposed himself to me, but that I had looked away and avoided seeing anything. Kriyananda apparently thought my story was wonderful and actually giggled, saying "well, it was for sex too," clearly referring to his own sexual "problems." (Because of his laughing, almost coy reaction to my story, I gathered that Kriyananda understood me to mean that because I had not responded to my cousin, the Ananda women should not have responded to Kriyananda's sexual advances. He clearly understood me to mean that I blamed the women for reacting to Kriyananda's sexual advances and that I blamed them as well as Kriyananda for allowing the sexual intimacies to happen. (He was wrong of course.) Kriyananda then said, "these women are all hysterical." I responded, "no, not all." He later made a comment that it was the women's "fault" for "revering" him (and therefore, letting him have his way with them sexually.)

I had also made a comment on the phone that there was a movement to expose him and his sexual abuses of the Ananda women. Kriyananda responded to that comment in a very childish, huffy way, but almost as if he had some wonderful secret: "I haven't hurt anyone for 14 years." He then added under his breath partially to himself that I didn't know this one and in an almost proud way: "I did hurt one person, Janice. You don't know about her. I'll have to do something about her." He ended our conversation with the same statement of denial he used with Sheila that he hadn't used his "will" in these sexual acts and that made it okay. Disgusted beyond words, I addressed this absurdity in my May 1st letter by saying, "Unless you have a serious organic brain disease, syphilis of the brain, or schizophrenia, or are possessed by an entity, your "will" has been present at all times." (I then informed him he had none of these symptoms.)

My contacts with Kriyananda after that conversation were limited because I realized that he would not change and I was horrified by his inability to handle reality. I called him back the next day to see whether he was physically well (due to his heart) from our conversation and Kriyananda said he was fine, and that he had not considered my letter a letter of criticism. He seemed unable to accept reality within a normal frame of conscience. This mistaken response to the statements regarding the karma of the women seemed prevalent on his understanding and denial. On May 1, 1995, I wrote Kriyananda another, less tactful letter about how what he was doing was wrong, also the subject of the April 1995 letter. The letter also informed him that I was going into "seclusion" and not to contact me for awhile.) In this letter I covered his denial, that to continue the friendship, I would have to become a hypocrite by denying all the spiritual principles that I know to be true. The harm he has done to women and the extreme evil perpetuated by misrepresenting Yogananda and his teachings, and also as a spiritual teacher he was supposed to take people away from sex, not into sexual acts. I strongly informed him SRF has no connection with the court case regarding the abused women and told him no one has the right to hurt SRF regardless of disagreements. I discussed his sick need to subjugate women

and his narcissistic behavior in general in regard to criticism, and last but not least, described a psychopath in behavior on some levels. He then returned to Palo Alto from Hawaii and telephoned me from Palo Alto. I didn't speak to him and I didn't return his call. Since then, I have received several letters from Kriyananda, but I have not spoken to him. I later made an attempt to get Kriyananda to phone me sometime in May after speaking to several psychologists about Kriyananda's serious personality disorder. They encouraged me to make an effort to reach him because they considered it quite rare for an individual with his symptoms to trust another as Kriyananda had done with me. I then felt a moral responsibility to try once more, although I didn't expect it to help. After giving it a month or so, I then changed my phone number so that he would not be able to reach me. (I didn't think he would take the bait and his phone calls and letters had upset my family.) I had been aware almost immediately, upon my first visit to Ananda, that something was amiss in regards to opinions about women's equality, although I couldn't prove it at the time. Lea Philpott (Lea Hoogendyk), Kriyananda's housekeeper, Ananda minister, and member of Kriyananda's inner circle made a startling comment that women became strange or weird in groups without "male energy". She implied that it was very important for women to be around men for emotional balance. Since this was not in any way a part of our religious teachings in SRF I sensed something was amiss, especially since she was an Ananda minister and should clearly know our spiritual teachings. Also, long before the law suit began I noticed in Kriyananda's 14 steps to higher awareness lessons demeaning comments about women. I confronted him about his statements on the phone and he became abnormally defensive. "For in all fields, even those considered the proper domain of women, it is usually (not always) men who excel." was one such statement. Kriyananda's chauvinistic remarks in his writing seemed numerous. He has since been forced to change some of it because Devi told me that there had been too many complaints from the public. Kriyananda's chauvinistic remarks were not limited just to his writing. One of the absurd comments he made was that women have not been discriminated against, not even in third world countries. That they have always had the power and use it to manipulate men. It became clear, almost in the beginning of our relationship that he had serious subconscious problems, repressed hostility regarding women and displayed a need to subjugate them. I didn't dream, however that his psychological problems had extended out into sexual perversion and that it had a profound affect upon his community in regard to women subjugation in various ways.

Kriyananda appears to have a very low opinion of women. For example, Kriyananda goes around Ananda saying women don't make good leaders and blaming Daya Mata of SRF, SRF's female leader, for many of his problems. He made a point to me during one conversation how he does not have any women in top positions of leadership at Ananda, with one exception in an Ananda center (not in Nevada City). I once told him a story where Anandamayi Ma, a female guru in India who held both traditional and modern views, said the world will not be spiritually advanced until it reaches a level of equality [between men and women, among others. Anandamayi Ma continued, saying that when the world does have equality, women will be at the "helm" and men will "row the oars." Kriyananda got very upset at that story and insisted that the story had been incorrectly translated into English. Devi strongly admitted to me once that "Kriyananda doesn't like women." He thus uses his female disciples sexually while blaming them for giving in mentally. I was present when he publicly stated that he didn't "like women much" right before or after he called homosexuals "the derelicts of society." Devi also described the problems in his personality quite well by

telling me that "no one could be married to Kriyananda unless they had absolutely no expectations". She gave a definite vocal inflection on the words (e.g., she emphasized these words). I took it to mean one who is incapable of normal empathy and feeling. She further explained, "Don't get me wrong, Swami can be very charming." She was describing a psychopathic personality right out of a text book. That type of personality has no normal conscience, but they generally are quite charming and unusually magnetic in certain ways.

Kriyananda also has a very bad temper and is unable to accept any criticism whatsoever, a phenomenon I have witnessed on several occasions and which is common knowledge at Ananda. Haridas Blake said to me one day regarding my April, 1995 letter, "Janice, you're very brave to write this letter to Kriyananda [criticizing him]. You know that once you do this, he will go after you and make up slander. I've watched him use his slander to subtly influence the community into believing exactly what he wants them to believe. I've seen it all through the years - whoever criticizes him will get it in the neck." Haridas also told me that when he went to Kriyananda right before Kriyananda's trip to Hawaii to try to get Kriyananda to come forward and to tell the community the truth about his sexual conduct, that it was a terrible experience. Haridas told me that Kriyananda kept denying that he had done anything wrong and Haridas kept reminding him of the many women involved. Durga's reaction to Haridas, according to Haridas, was "well, someone had to tell him [Kriyananda]." Similarly, when Kriyananda became so upset about the "terrible" letter from Anandi Cornell which chided him somewhat for his behavior, Vidura Smallen told Anandi during a private meeting about it that he "could have written every word in that letter myself, but that the "timing" was wrong (meaning Kriyananda couldn't take criticism, at least not at this moment in time.

Interestingly enough, however, Kriyananda denies that he is unable to accept criticism. I commented on several occasions that he didn't relate to others or understand them when they criticized him. Also when I told him during our two hour conversation when he was in Hawaii that I wasn't going to "butter him up" like his Ananda followers, he protested, saying "I don't understand them. I can't relate to them."

Kriyananda's inability to accept criticism is combined with his belief that he is "God's channel." He has repeatedly told me, as he tells others, that the Ananda members are so "fortunate" to be involved with a "direct disciple of Yogananda" (Kriyananda) and that this is their "link to Yogananda," e.g., their "channel" that will take them to "God Realization."

Rosanna told me recently that Kriyananda said to her: "I can change anyone. I have the power to change anyone's mind and change their opinions." Rosanna said she was so shocked by his belief and comment that she couldn't reply. Rosanna told me Kriyananda lost his temper when she had observed how he used people and brought it up to him on one occasion. Rosanna also told me that Kriyananda said to her one day, while they were still married, that Nirmala Schuppe had wanted to become involved with Kriyananda sexually but Kriyananda wouldn't because, as he told Rosanna, he commented to Nirmala "I am too big for you." Rosanna was shocked at his crude statement. Kriyananda also told Rosanna one day: "People say I am wise, therefore I must be wise." Then, later on, Kriyananda informed Rosanna, "I have the final say here [Ananda]" in a bragging, egotistical manner.

Kriyananda's inability to accept criticism has formed an abnormal fixation within his mind in regards to SRF, especially in Daya Mata. I observed it first hand and Jyotish and Devi, and Rosanna all stated the same information to me about this abnormal syndrome. Every day since they have known him, almost without fail and when they have been in his presence, he has lamented the same story or a similar one about SRF and his dismissal. If he doesn't touch on the dismissal it will be some other negative comment about SRF. He seems so fixated about SRF that Devi, in frustration told me that years ago they were invited to dinner with Kriyananda and Jyotish said in exasperation "I wish, just once he wouldn't talk about SRF." Jyotish and Devi broke from the usual norm of not being able to think for themselves when they confided in me that their "swami" may not find God realization and therefore total spiritual freedom unless he overcomes this obsession and abnormal attachment. They believed it was an attachment especially with Daya Mata and a serious hindrance for Kriyananda on the spiritual path. Rosanna complained to me that she was stunned when she observed Kriyananda's problem with this obsession with Daya Mata (and probably SRF board of directors also but on a lesser scale). She tried to help him come to some sort of peace with the past by telling him in an encouraging manner to try and let it go emotionally within his consciousness and also encouraged him to attempt to stop talking about his SRF dismissal every day. She knew he had a serious abnormality in regards to his inability to deal with this past situation, but was powerless to completely help him in this because the psychological problems were severe in Kriyananda.

Kriyananda in his sordid consciousness, made a startling comment to me another time in regards to his evil sexual behavior and his breach from reality on the phone to me. He said "well, they started it all," meaning SRF was to blame for the demeaning acts he had done with women sexually. His mind somehow repressed his serious anger towards SRF for what he thinks was unfair treatment and all is intermingled in a form of denial, hostility, and in my opinion, true insanity. Given the severity of this fixation, it is of no surprise that Daya Mata and SRF board members would be the abnormal focus of his frustration due to his inability to face reality on many levels, remaining in constant denial of his actions, he uses SRF as his scape goat.

Kriyananda told me on several occasions that he thought he was Yogananda's youngest son in a previous life and was thus a "king" in that lifetime. Kriyananda thus believes that because he is a "king," Ananda is his "kingdom" in this lifetime. At first, Kriyananda told me he wanted Rosanna to take over Ananda as she was the "queen" being married to Kriyananda, the "king." Then, after Rosanna and he divorced and Rosanna refused to associate with him anymore, Kriyananda told me he wanted his nephew to take over Ananda because "Jyotish doesn't have 'magnetism.'" This was despite the fact that his nephew was not a devotee to my knowledge, and was not knowledgeable of Paramahansa Yogananda's teachings or to his precepts. Kriyananda later relented and commented to me, "well, I guess it doesn't have to be in the bloodline." He later relented even further by finally deciding that "he couldn't worry about Ananda after he was gone."

One story that Kriyananda has repeatedly told me (as well as to many Ananda members) is a story he uses to make those close to him feel sorry for him. He also appears to use the story in order to justify his own sexual behavior and concealment thereof. According to Kriyananda, one night he saw this girl and he was so attracted to her that he couldn't go back to the Ashram. Instead, he checked himself into a motel and cried all night. Similarly, he told me another story from his early days. According to Kriyananda, when he was an SRF monk at Mount Washington,

Kriyananda told Yogananda about his "strong sexual drive." Yogananda supposedly told Kriyananda to only discuss this "strong sexual drive" with Yogananda and no one else. Kriyananda now uses this story to justify concealing his sexual "problems" from members of Ananda as much as possible.

Kriyananda also has this theory that it is fine to "dabble in sin," e.g., as long as you are trying to overcome your flaws it is fine if you are unable to overcome them. Thus, even if you are unable to overcome your "flaws," you will still become spiritual and can do good things with magnetism. This is an easy form of justification and denial that he uses as he lives a dual life of sexual subjugation of women and other self-serving negative activities.

I have also heard comments from various people which leads me to believe that Kriyananda plays match-maker with the Ananda members. Nirmala, for example, had apparently asked Kriyananda which of two men she should marry. He has also encouraged couples to stay together regardless of the mental and emotional suffering the woman may incur. Normal judgment is relinquished to give Kriyananda the final say on all matters of their lives. I observed in several marriages where the husbands had made serious errors that Kriyananda would attempt to blame primarily the wife for the problems. As an example, Karen Levin told me that she had talked to Kriyananda and then blamed her own behavior for Danny Levin's incorrect sexual conduct with Ann Marie. I knew from Devi Novak that Danny Levin's actions were shockingly sordid. Devi Novak mentioned his disgusting behavior to me because Jyotish and Devi removed him as a disciplinary action from being an Ananda Minister. Devi mentioned to me several times her shock and dismay over Danny Levin's behavior. It was quite obvious to me that Kriyananda had purposely put Karin Levin on a guilt trip. It seemed even more evil than usual circumstances because Karin is also suffering from cancer and believes Kriyananda is a holy "channel" to God-realization.

Many of Kriyananda's close followers are well aware of his repeated sexual use of Ananda female members over the past thirty years. But they also are blindly loyal and completely brainwashed by Kriyananda, so they are now trying to help him conceal his conduct from the rest of the Ananda community. Most of them are completely brainwashed by Kriyananda to give him unconditional love and obedience. They would be sacrilegious to question Kriyananda's actions and, in cult-like fashion, believe he is above the norm of accepted behavior within society. His devout followers are now trying to help him conceal his conduct from the rest of the Ananda community.

Jyotish and Devi Novak manage the Ananda community on a day-to-day basis for Kriyananda. Jyotish, on several occasions, commented that Kriyananda is his guru and Devi told me that Kriyananda could take her to God realization. They repeat the same statements to their community, that the community will find "God realization" through Kriyananda. Devi also told me that Kriyananda is part of her, and his karma is her karma. This belief is held by, and is encouraged to be held, by many of the Ananda followers in "blind attunement to their spiritual channel" as characterized by Kriyananda. Sheila Rush, Kriyananda's attorney, once said to me: "Kriyananda is my life." Padma McGilloway told me that she "loves Kriyananda more than anyone in the world." Anandi Cornell told me that "he is my energy." This blind loyalty and "unconditional love" is one of Kriyananda's primary spiritual teachings and is part of the reason that he has gotten away with his sexual "problems" for so long.

Moreover, because of this irrational blind loyalty, many of Kriyananda's close followers will do anything to save Ananda and protect Kriyananda, their "divine channel." Devi admitted to me that she lives in fear of everyone leaving Ananda and that she will stay there no matter what happens. Devi and several other Ananda ministers apparently have been telling a few Ananda members recently that Paramahansa Yogananda had a sexual indiscretion so as to make it appear that Kriyananda's conduct is less culpable. She told me that she felt like she lives in a war zone, because she has had emotional problems from trying to cover up the facts about Kriyananda's sexual life from the community members. Devi commented to me one day that Kriyananda will justify anything within his mind - that he rationalizes by covering up his behavior and making up stories which he eventually believes them himself. Nonetheless, she said to me on another occasion, when we were discussing Anne-Marie's lawsuit, "don't worry, Janice, there's a hardcore group of us that won't let the truth come out."

Durga Smallen, who helps run Ananda with her husband Vidura, Jyotish and Devi, made a similar comment to me one day. Durga said to me that it was "terrible" all the "problems" they were having with the women who took issue at Ananda with Kriyananda's sexual conduct: "it's hard to get these people out of here. It's not as easy as it was years ago. You know they have expensive homes and their children are in the schools." In context, what Durga clearly meant was that once the various women that Kriyananda sexually used became sufficiently unhappy to complain about the situation, it was more difficult to quiet them down and quietly get rid of them so that the Ananda members would remain ignorant of the true nature of their "swami." Durga also confidentially tells members at Ananda that Kriyananda is her "guru". Her lack of understanding to the extent of chilling brainwashing was frightening. Durga seemed to lack all normal conscience in these regards, replacing her own moral and altruistic values for what her "divine channel" said and wanted.

Jyotish Novak, Kriyananda's "right hand man," is also well aware of Kriyananda's repeated sexual abuses. Jyotish told me that he has known since 1968 of Kriyananda's sexual relationships with women at Ananda and elsewhere. Jyotish Novak's attitude is even more chilling than Kriyananda's in some respect because he seems to have an abnormal identification with Kriyananda, almost like an alter ego. He commented once to me all Kriyananda's disciples were around the same height as Kriyananda (we were speaking about a disciple of Yogananda's ) Devi Novak commented to me once that Jyotish acted almost like Kriyananda's wife (at a specific time she thought Jyotish's devotion to Kriyananda was wonderful) The close friends of Jyotish are well aware that he is unable to stand up to Kriyananda and he also knows that he can't address certain issues not just Kriyananda's sexual activities, because Kriyananda doesn't trust him completely. I saw the fear Jyotish had, first hand, when he asked me to speak to Kriyananda about a matter of business. I was shocked because I don't live at Ananda, and it would not have been the proper thing to do (in other words, it was Jyotish and Kriyananda's business, not mine). Jyotish's comment about Kriyananda's lack of trust was my first clue to the serious personality problems and narcissistic behavior in Kriyananda, also only one who is passive and obedient like Jyotish could remain loyal and accepted by Kriyananda through the years. The interesting fact is that Jyotish has been with Kriyananda since the beginning of Ananda, yet, Jyotish freely admits Kriyananda's lack of trust. This fact shows clearly Kriyananda's psychological problems because, Jyotish, at all costs, no matter what happens knows well not to upset or contradict his guru on most all matters that are important to Kriyananda. Victoria Kelly told me that when she first found out about all the women who had been abused sexually at Ananda, she went to Jyotish, stunned about the entire situation. Victoria asked Jyotish how he could let

all this happen. Jyotish looked at her sarcastically and said "well, what would you do". In other words, you don't stand up to Kriyananda no matter who gets hurt. Needless to say Victoria was sickened by the evil of this inhumanity to others in the name of God and finding "God realization" and left the Ananda community after living there for seventeen years completely oblivious of this evil subjugation of women and affront to Yogananda's teachings.

Devi Novak also admitted to me that Kriyananda's "women" had come to her and Jyotish over the years and complained about Kriyananda's sexual advances against them. Devi said to me during one conversation: "Janice, when we [Jyotish and Devi] got back to Ananda from San Francisco in the 1980's the behavior pattern had already been set." (Jyotish and Devi managed the San Francisco Ashram for Ananda beginning in the late 1970's.) Devi continued, with respect to Kriyananda's sexually using the Ananda female members, saying "Kriyananda has done really bad things" repeatedly. Devi also admitted, however, that she and Jyotish could not address these issues to Kriyananda because he was "closed" and didn't have enough trust in these "areas." Devi then asked me, "Janice, how could Kriyananda think he could get by with this?". I replied that Kriyananda had told me that he "always knew the information about [his sexual conduct] would come out," but felt that his "good karma" would protect him. I also commented that perhaps he subconsciously wanted to be caught.

It is interesting to note here that some serious personality disorders always seem to leave a trail, no one knows why they do this, it is almost like on some subconscious level they want to be found out. Kriyananda mentioned to me more than once that he knew that this would happen. They both had hopes from the beginning that I could reach Kriyananda and encourage him to tell the Ananda community the truth. Even though Jyotish, according to Devi, didn't take issue with Kriyananda's evil sexual life, they both did want things to run smoothly with the community and were insecure about the handling of the situation and a cover-up.

Vidura Smallen is the other male leader of Ananda. After several visits to Ananda it was easy for me to observe Vidura had certain issues around women. He seemed to lack respect for them. I mentioned this to Devi and she concurred that not only did he not properly respect women but also didn't include them in major meetings or decisions and commented further about his nature to flirt with women. It then became easy for me to understand the mechanics of Kriyananda's leadership and how these atrocities done to women in the guise of Yogananda's teachings were able to be perpetrated. One leader, Jyotish, took no or very little issues and the other, I later found out from various individuals at Ananda is well known as a "womanizer."

Several other incidents have also been brought to my attention at various times. Jeanette Williams was the practical nurse that took care of Kamala Silva at Ananda. I didn't realize for several years after Jeanette and Kamala left Ananda that Jeanette's experience was probably not an isolated incident. She first phoned me distraught about hearing that Ananda members are supposed to be "to tune" with "swami". I didn't believe her because at the time I had no experience with the people at Ananda and knew that that would be against our teachings. Then an Ananda minister started to sexually harass Jeanette. She finally had to threaten him that she would report him to Jyotish and Devi. Jeanette left Ananda shortly after this incident, and as far as I know I'm the only individual that she confided in about this. I didn't mention it to anyone because the minister was sent to another Ananda Center soon after Jeanette had threatened him.

Haridas Blake also told me about an incident which occurred when Haridas first came to Ananda in the 1960's or 1970's. Apparently, a woman who was a masseuse but not a member of Ananda was asked to give Kriyananda a massage. She came out ashen-faced afterwards and said to Haridas, "this has gone too far." She later told Haridas that Kriyananda had had her sexually stimulate him during the massage. After that incident, Haridas told me the woman left Ananda and never returned. Signed under penalty of perjury under the laws of the State of California that the foregoing is true and correct on this 8th day of January, 1996.

Jxxxxx Mxxxxx