

SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO ANNE-MARIE BERTOLUCCI, Plaintiff, vs. ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; DANNY LEVIN, individually and as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION and CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;

No. 390 230

DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDENTS' MOTION FOR SUMMARY JUDGEMENT

I, XXX, declare:

1. I am a former member of the Ananda spiritual community, which I believe later became the Ananda Church of Self-Realization ("Ananda"). I make this declaration of my own personal knowledge and if called upon to testify could and would do so competently.

2. I first came into contact with members of the Ananda spiritual community in May, 198X. I was twenty-two (22) years old. At that time, I was searching for a spiritual community to join and live in. To that end, I went to the Ananda community's house in San Francisco to meet some of its members and find out about the church and its spiritual community in rural northern California outside of Nevada City. After meeting with the San Francisco church members, I also spoke to various friends and associates in Los Angeles regarding their impressions of Ananda and its teachings. I also spent a weekend visiting the Ananda community, which included a "monastery" within its grounds. After about three (3) months, I decided to move to the community and join the apprentice program.

3. The Ananda Church teaches the philosophy enumerated by Paramahansa Yogananda, including a monastic lifestyle. At the time I joined the community, the role of its "spiritual leader," J. Donald Walters, was minimized to me. Mr. Walters called himself "Swami Kriyananda" and supposedly followed all the teachings of Yogananda, including the renunciation of all of the purely human desires, including sexual. To my knowledge, all of the male members of the Ananda community "monastery," including the "Swami," had taken vows of chastity, poverty and "cooperation." (Swami Kriyananda had replaced "obedience" with a vow of "cooperation.") The "nuns" of the community did not take vows.

4. The term "swami" is a term which describes a member priest of an Indian monastic order, attained after a series of steps within the religious order over a period of years. One who has become a member of the "swami" order has renounced worldly desires, including sexual.

5. "Swami" Kriyananda held himself out in the Ananda spiritual community as having successfully obtained a higher state of "being" through living by these vows merely by using the title "swami" within the community. His "inner circle!" reinforced this elevated, spiritual status through constant reinforcement that we (the disciples) were privileged to "serve" the "Swami" and that he was Yogananda's direct representative or "channel" for the community.

6. I personally discovered later on, however, that "Swami" repeatedly abused his position of power

within the church to convince young women in the church to satisfy his sexual desires while simultaneously convincing them it was to their spiritual benefit. I was not aware of his sexual interaction with young female church members until it happened to me.

7. During the first year that I lived in the Ananda spiritual community, I did not often come into contact with Swami Kriyananda apart from attending classes that he taught. I spent that period taking instruction in the various yoga teachings and methods, much of which included the basic tenets as taught by Paramahansa Yogananda. At that time, the "Swami's" role in the community was not emphasized to me and there appeared to be a relaxed atmosphere regarding that role. I also had a job at the community dairy farm which paid very little as a salary. However, I was happy to work there as part of my service to the community.

8. Sometime during that first year, however, I was speaking with one of the "nuns," Anandi, about my experiences within the community. When I told her I enjoyed being a part of the community and following the yoga teachings and methods, but I wasn't really "tuned in" to Swami Kriyananda, Anandi immediately informed me that it was a serious error in me. That it was necessary that I "tune in" to the "Swami" as the representative of Yogananda, and that I love him unconditionally without criticism or doubt. This was the beginning of the repeated emphasis to me that the community members were supposed to give the "Swami" "unconditional love" and to "serve" him and the community without thought of oneself. This "service" was emphasized both indirectly and directly within the community. I went to at least one "class" where the central topic was the extreme importance of church members to be "in tune with" the "Swami."

9. Members of the community were also taught to be "in tune with" Swami Kriyananda, to "move in his direction," and to look to his life as an example of a devotee leading life in the "right" way. When one parent complained that the young men were "mimicking" the "Swami," he responded that it was "natural," compared the young men and disciples! in general to Krishna's "soldiers," and told the oft repeated statement that "all Krishna's soldiers were like Krishna." In other words, Swami Kriyananda compared himself to Krishna. We were also taught by Swami Kriyananda and his close followers that he was the "master's direct disciple" and the "master's channel." Swami Kriyananda would also gather certain elders of the community at his home, myself included, and tell them they were important to him and were part of his "inner circle." To be closer to him, as Yogananda's representative, meant being closer to Yogananda. Thus, any extra attention from the "Swami" was supposed to bring that person greater spiritual growth.

10. One of the underpinnings of the teachings of the Ananda community and Swami Kriyananda was "unconditional love." The Ananda "teachings" greatly emphasized "tuning in" with the Swami, and not to criticize his instructions. "Unconditional love" given to the "Swami" was the message communicated to us. The "Swami" often told a story that his father purportedly told him of a man who criticized the company he was in. His father would say "that's not right" -- if you are in a company you shouldn't criticize it. You should leave if you feel critical of a company, then it is okay to criticize it from the outside."

11. After I had spent approximately one year or so as a member of the Ananda spiritual community, in or about May or June, 1981, I met Swami Kriyananda during lunch at a community dining area. The "Swami" had just begun to spend more time out of seclusion and associate more with members of the community on a daily basis. At the time I met him, someone mentioned to him that I was a trained masseuse. Within a week or two, "Swami" asked me to give him a massage. As he had been having problems with his shoulder. I was happy to help the church's spiritual leader and I agreed.

12. After a month or so, the "Swami" requested that he not use a towel to cover himself during the massage. Although his request was a little unusual, I didn't suspect any ulterior motive for his request, and I agreed. Notably, when I mentioned this to Seva, the head "nun" of the monastery, during a conversation, she told me "you should keep him covered with a towel." In hindsight, I believe she was warning me about the "Swami's" repeated sexual exploitation of young female community members. At the time, I believed I was safe as the "swami" purportedly lived under a vow of chastity.

13. After several months of giving "Swami" massages, including full body massages, he requested that both I and XXXXX give him a massage at the same time. Until this point, I had given him ordinary massages with no sexual nuances whatsoever. This time, however, it changed. The "Swami" was downstairs in the bedroom on the floor. As I massaged the "Swami's" neck, to my great surprise. XXXXX began to sexually stimulate his penis, from erection to ejaculation.

14. Although I was shocked, I accepted the sexual stimulation during the massage "service" as a disciple for the church "swami," as I had been taught by Ananda. Service to the "guru" without thought for oneself was highly emphasized in the Ananda spiritual community. Many community members talked about Swami being their "guru" and "salvation." Swami often told a story about Krishna's chief disciple, Radha, which taught the ideal of selfless service even where such selflessness appeared to be detrimental to a disciple's personal salvation.

15. Soon thereafter, the "Swami" again wanted a "massage." XXXXX removed her clothing to massage the "Swami." I also removed my clothes at the "Swami's" request; I had become very passive to the "Swami's" instructions. XXXXX again sexually stimulated him to ejaculation. When the "Swami" began to take my hand and place it on his genitals, I understood that he wanted me to provide "service" to him in that manner as well.

16. My "massage" routine with the "Swami" thus became a regular massage followed by sexual stimulation. At some point during the massage, the "Swami" would take my hand and put it on his genitals and fondle him until he ejaculated. I came to accept that as part of my "service" to him. The "Swami" repeatedly had me "massage" him, sometimes instructing me to remove my clothing.

17. After about six months of "massaging" the "Swami" whenever he wanted, in or about spring, 1982, I ran out of money to pay my rent. I returned to Los Angeles for a couple of months to earn and save money as a masseuse. While I was working in Los Angeles, Swami Kriyananda came down at times to give seminars. Whenever he was in Los Angeles, he would ask me to meet him and "massage" him. A "massage" almost always included sexual stimulation until the "Swami" ejaculated.

18. In or about May or June, 1982, I returned to the Ananda spiritual community in northern California for a brief period. I soon decided to move out of the community and into the Ananda house in San Francisco. I was able to earn money as a masseuse and to still live within the Ananda sphere. While I was in San Francisco, Swami Kriyananda visited me fairly frequently and asked to "massage" him.

19. At some later point while I was in San Francisco, the "Swami" asked me if I would like him "inside me." I acquiesced because I believed it was additional "service." He also asked me once "which way do you prefer?" I understood him to ask which of the various methods of sexual stimulation that I had used with him did I prefer. I told him it didn't matter since it was "for his pleasure, not mine. The addition of sexual intercourse, my interaction with the "Swami" was strangely non-sexual. I believed that it was a privilege to provide "service" to him as the "master's

representative" and that sexual gratification was just one of the services. While we were together he would tell me to "tune into his consciousness," meaning I should take advantage of my close contact with him and the spiritual benefits gained as a devotee. He thus minimized the physical aspect and emphasized the spiritual benefit I would gain. He also said to me at one point "don't take this personally," meaning the "services" I provided to him were only that.

20. He never looked at me or touched me in a sexual way, except for one incident. Although the "Swami" didn't react at the time to my comment that my "service" was for "his pleasure," very soon thereafter, he massaged my breasts to arouse me. When I responded to the stimulation, he then said "I thought you didn't get any pleasure." This was the only time he ever touched me beyond manipulating me for his own pleasure. During the entire time that we had sexual intercourse, I never once had an orgasm. For me, it was not a sexual experience but one of surrender of my preferences and "service" to the "Swami." At one point the "Swami" even asked me if I thought he was "using" me.

21. I lived in the Ananda house in San Francisco for approximately two years. While I was living in San Francisco, I became attracted to a community minister that I had known for years, Haridas. I asked the "Swami" if he thought it was a good idea if we started dating. Swami Kriyananda encouraged me, telling me that the relationship "would be good for Haridas." When I later returned to the Ananda community outside Nevada City, Seva, the head "nun" also encouraged me to pursue a relationship with Haridas. As a general rule, Ananda taught that romantic relationships with another person who followed the same spiritual "path" as we did would be easier than with one who did not.

22. I was asked to and did return to the community to replace the lady who was providing child care for various members of the Ananda community. I began to have more interaction with Haridas. After awhile, I wrote Haridas a letter asking if he shared the feelings I had for him and if he would like to start dating. I also mentioned at some point that Swami Kriyananda had encouraged a relationship. Haridas was very interested in that fact and agreed that we should start dating. We were romantically involved for about two years. Soon after I became involved with Haridas, the "Swami" stopped asking me for "massages". I was aware while I was in San Francisco that he had also been spending time with XXXXX and I believed that he was also using her for his sexual gratification.

23. While I was at the Ananda community shortly before I became involved with Haridas, Rick, a friend of mine said that he had talked to XXXXX who had told him about "many things." I understood the language "many things" to refer to XXXXX's and my sexual stimulation of the "Swami" as part of our "service" to him. Rick asked me if it was true and said to me that if it was true, the Ananda community would be "blown apart." I didn't respond to him but later wrote Rick a letter admitting that probably what XXXXX had told him was true, e.g., that Swami Kriyananda had used us for sexual gratification.

24. Before I gave the letter to Rick, however, I naively (in hindsight) showed the letter to Swami Kriyananda. To my surprise, the "Swami" immediately became agitated, with a shaking hand spilled coffee on my letter, and began talking to me in a very intense, loud voice. I was very shook up by his behavior.

Because there were other people in the room I had a hard time concentrating on our conversation. He suggested that we go to another room where there was some privacy and continue our talk. Once in private, his voice calmed and as we continued to talk he very calculatingly said, "you seduced me." That statement was like a knife through my heart because I knew he was lying and I had never heard him lie before. I now understood that he didn't want the truth about his sexual interaction with

me and the other young women in the community to be made public. I also understood that if I told the truth, he would lie and accuse me of being the aggressor. Up until that point, I had not realized that what the Swami had instructed me to do was "wrong" and that I was not supposed to talk to anyone, including Rick, about it.

25. At the time. I rationalized his behavior as conduct the "Swami" felt was necessary in order to protect "his" community, that preservation of the community was the most important issue, no matter what lies about his own personal failings were required.

26. Several teachings also helped me to rationalize his lie and accept his behavior. Swami Kriyananda would often compare himself and others to a stained-glass window. He always prided himself on his very high "energy." He thus told a story in which he explained that where there was not a lot of light or "energy," a stained-glass window would not show very much of it's colors, whether or good or bad.

Similarly, the "Swami" said, a person whose life is very "dynamic" or "energized," such as the "Swami's" own life, the good was very strong and the bad was very strong. I now realize that this "strong bad" theory was probably intended to smooth questions anyone might have regarding the "Swami's" "bad," e.g., human, behavior or failings.

27. Because the "Swami" reacted so negatively and I had reached the point where I could rationalize even his lying about the sexual relations, I didn't give Rick the letter that I had written. r also never really responded to his question and basically went along with the "Swami's" sweeping it under the rug.

28. About two years after the relationship with Haridas ended, I moved away from the Nevada City community to the San Francisco Ananda house. I began attending school in San Francisco to finish an undergraduate science degree, began working part-time in a laboratory, and began preparing to leave the Ananda community altogether.

29. Even at that point. after I had made the decision to leave, a member of the Ananda community, Greg Seigmeister, came to me and tried to talk me out of leaving. During that conversation, he told me that I was making a mistake, that Swami Kriyananda was my "guru," and that Swami Kriyananda was my "salvation." When I graduated in June, 1985, however, I left the Ananda community as I intended.

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Case No. 390-230 A

DECLARATION OF XXX IN SUPPORT OF CROSS-DEFENDENTS' SPECIAL MOTION TO STRIKE CROSS-COMPLAINT

Deposition and Sworn Testimony:

1. I am not a party to this action, am above the age of eighteen and am a resident of XXX. I could and would testify to the following in open court. I have first hand knowledge of the following matters and facts.
2. I first met Donald Walters, in 198X at a talk he gave at the Unitarian Church in XXX. At the time he called himself Swami Kriyananda, and was referred to as Swami or Swamiji. I was a student at XXX University and having read the "Autobiography of a Yogi" by Yogananda, I was very keen to meet someone who was billed as the direct disciple of Yogananda.
6. My feelings toward Donald shifted from that of friend, to those of a daughter towards her father. Being 21 years old compared to his 55+ years, I loved him dearly as a father figure. In my journals, I referred to him as my beloved father. I felt secure and happy in my new found home, working hard, for little wages, living simply and, thinking high. I asked to join the monastery and was allowed to become a nun, and live in Ayodhya, the quarters near Swami's house.
8. I saw Swami frequently, our relations were always jovial.

His talks, his emphasis on himself as a clear channel for God and Master (Yogananda), the demeanor of the community members towards him, slowly turned my mind to thinking that he was a "realized" soul.

12. He offered me a ride from the farm to Ayodhya. I gladly took it, viewing personal time with him as a positive to the spiritual regeneration of my soul. During the ride, he asked me to come down to his house. I went, he asked me to give him a back rub, in his upper room in the dome part of his house. I did gladly, although I felt very shy, and uneasy, never having been so physically close to him before. He asked me to straddle his back in order to access his shoulders properly. In a few moments he asked me to take off my clothes, as they were irritating his skin, while I gave him the backrub. I was extremely surprised, but, he said some things which assure me, making me feel that he was a pure channel of God and that I had no cause for uneasiness. I took off my clothes, and he then had me resume the back rub.

13. I was feeling very confused, by the actions of my beloved father figure, then he turned over on his back, exposing himself, and rubbed himself against me until he ejaculated all over himself.

I was numb with a sickening deadness that I cannot explain. He told me to get a napkin to clean off the ejaculate. I said, "No", put my clothes on and went and stood by the large window, overlooking

the Mountains.

15. He got up, fixed himself something to eat, I declined food, then we drove to the new temple at the farm where he gave an hour long talk on truth, following the path, devotion to the guru, and the importance of loyalty.

16. Finally, with his increasingly public and private attentiveness to me, the verbal encouragement from Kaylani and others to accept his advances and that I was extremely blessed to be able to provide energy to him, I began to feel that he was a divine lover.

17. After this, there were many more encounters. I once asked him how his behavior fitted into the universal plan of things, and he said, "It's just energy going from one part of the universe to another". With his instructions, I gradually came to accept his as being the way of playing with physical energy.

At first, as far as I knew, it was just with me.

18. Later, from statements made from older nuns and community members, I found out that many others had had relationships with him as well. His close, older disciples - Seva, Kalyani, Asha Paver, Parvati, Ann Mc Farlane, Shivanai seemed to understand what was happening and treated me with great leniency and indulgence.

Kalyani told me to view him as Krishna, and let him have his way, whatever he wanted. In none of these encounters did I participate as a full sexual partner, the sexual contacts were for his pleasure only, and as soon as he had ejaculated, I left. He taught me to use my mouth and hands to stimulate him.

22. Later, upon my abrupt departure from Ananda, he began to invite a fellow nun of the same age as myself, to be present in the encounters, and often the two of us would sexually service him.

23. While I was there, there was no penal-vaginal intercourse. He began to become increasingly enamored of my friend, and I slowly dropped out of the sexual picture, still taking care of his housekeeping, cooking and laundry.

31. It is my wish that those at Ananda, who go there with open hearts and minds, know the truth about the man they are following, and not excuse his behavior on any grounds. His behavior and that of his close devotees is not part of any divine scheme, but rather the manipulations of an arrogant mind, that does not respect the sacredness of all life. At one point, Swami told me that he was greater than Gandhi and Sai Baba, that no one had the spiritual power he had.

34. I am grateful to be beyond Ananda now. The people at Ananda are by and large, very good, sweet, people. They are being heavily brainwashed into an unhealthy trance. I hope the truth will one day clear them of it.

Under penalty of perjury and pursuant to the laws of the state of California, I hereby declare that the foregoing is true and correct.

Executed February 6, 1995, at the County of XXX, State of XXX.

SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO Plaintiff, vs. ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; DANNY LEVIN individually and as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;

No. 390 230

DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT:

I XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of XXX, State. I could and would testify to the following in open court. I have firsthand knowledge of the following matters and facts.
2. In the spring of 1981, I had a beautiful home in paradise and led a well to do lifestyle, I lived on the island of Kauai, Hawaii with my husband (I was 25 years old). We had difficulty in our marriage because my husband resented me practicing yoga and meditation which I had started over a year prior.
3. I was almost finished with the "Autobiography of a Yogi" by Paramhansa Yogananda when I met Swami Kriyananda (hereinafter known as "S.K."), also known as Donald Walters. He was on vacation in Kauai and had stopped into the gift shop where I worked. He had other women with him. We got to talking and I asked him what he did. He said he founded a yoga community called Ananda north of San Francisco. He introduced himself as Swami Kriyananda, a direct disciple of Yogananda, He invited me and my husband to attend a dinner and slide show about Ananda at his condo. My husband declined but I accepted because I was interested in Yoga Teacher Training Course that S.K. had discussed.
4. Everyone at the slide show presentation was so adoringly reverent toward him, I gathered that he must be pretty important. He was on Kauai approximately 6 weeks. During that time he came to my home and immediately began telling my husband (who was a contract builder and a sous-chef) what kind of projects he could work on for S.K. and that there was a retreat kitchen he could cook at. My husband was very affronted and asked him to leave our home.
5. On another instance he arrived on our doorstep with a toothbrush claiming he was going to spend the night at our home. My husband told him to leave us alone. Later S.K. saw us on the beach and came over to sit 50 ft. from me. S.K. never spoke a word to us, yet he stared at me until my husband said he wanted to get away from him (S.K.).
6. Despite my husband's protests, I went to see S.K. again about the Yoga Teachers' Training Course. We had lunch and subsequently S.K. heard all my lamentations about how my husband didn't like my yoga/meditation and how much I longed to go to school, etc. S.K. proceeded to tell me that he "recognized" me as someone he'd known in other lifetimes. There was this "kinetic" energy going on between us, and he suspected that we might be "soul-mates". He gave me a lot of praise and made me feel special. My curiosity piqued and I wanted to see this community of happy people. I also want to see the yoga training course so that I could have my own business.

7. When S.K. and his entourage left Kauai for Ananda- I went with him. We arrived in San Francisco and stayed at Ananda House (S.F). The couple who kept it organized and who performed the church services were named Jyotish and Devi. They seemed very nice.

8. I spent the night in the same bedroom where two other women slept. We were awakened before dawn by female monastics singing at the door, signaling the time for meditation. We later drove to the Ananda Community and I toured the farm, store, print shop, retreat and later the gift/clothing shop in Nevada City.

9. I was told that there was no room at the retreat for me to stay for the Yoga Teachers' Training Course. S.K. offered to let me stay in a room at his home. Since S.K. was considered a monk, this made ripples throughout the community - especially with the other male monastics which S.K. attempted to assuage by explaining at a public meeting (called "satsang") that he and I were friends in many past lives. People said they were confused.

10. Being the new kid on the block I felt thrust into the limelight and getting attention and respect I hadn't earned. S.K. proceeded to tell me that my family didn't really know me and my spirituality therefore they couldn't truly love me. He said my husband was stuck in the delusion of maya and that he could never really love me either.

11. S.K. said he could help me and would initiate me into Kriya Yoga. When I asked him why he wasn't at Self-Realization Fellowship anymore, his answer was that there was a personality clash he had to leave. At first he felt that it was unfair-but then realized he had to leave in order to start Ananda. (Later he would often denigrate Self-Realization Fellowship ("SRF") which caused me to ask more questions. Indeed I found out he was very hurt and resentful about being asked to step down as Vice President.

12. I was told S.K. need to visit the Ananda Centers in Europe. S.K. asked me if I wanted to go. S.K. usually traveled with a group of members, most often they were core members. I felt very special when he asked me to go I was also very uncomfortable because I felt surely that there was someone else more deserving to go (all expenses paid).

13. We went to New York, England, Holland, Germany, Switzerland, Italy, France and back to the U.S. Members traveling in the group stayed to visit family while we continued on our tour of Europe and Ananda centers. We visited many religious shrines and art treasures.

14. I flew back to L.A. to see my mom instead of proceeding to San Francisco with S.K. While I was there, my husband came to see me. We stayed at the Portofino Inn one night. We hadn't seen each other in a while.

15. I conceived that night. My husband and I lost the house to the recessions. We needed to move out so we flew to Kauai and packed everything. My husband recently finished a University course in Chicago to open his own restaurant store. He planned to store our belonging in Barstow near his Dads and work at the Flagstaff McDonalds as part of his "owners" training. I proceeded to go with him to Flagstaff and to mend our relationship. I was plagued by letters and phone calls from people at Ananda.

16. Finally I realized I was pregnant. My husband told me didn't want a child since our relationship was so rocky. I told him I was keeping the baby no matter what he said.

17. I went back to Ananda believing that it was now my home and that it was where people truly loved me. (Stupid me). I toured other Ananda Centers in Northern California and went to Carmel with S.K.

18. By now S.K. really had his hooks into me. I totally trusted him as a spiritual teacher, minister, leader and friend. I was his close friend and confidant. He asked me to present something for spiritual renewal week at the retreat temple of leaves. People really felt my being there helped.

19. Soon we were off again to Egypt with a group of people for two weeks. I got sick from the food at the end of the trip and was noticeably showing pregnancy at 3 months.

20. I remember him telling me that we would be rooming together to save money. Everyone else on the tour had roommates too. But I wasn't thrilled about it.

21. When we got back from Egypt, people in the community wanted answers as to what S.K. thought we were doing together. Many ruffled feathers had to be smoothed over. S.K. was presenting me as a mother figure to the community. People were continuing to state that they were being helped by my presence there. I felt that I was needed and initially agreed to take that role.

22. In late fall S.K. took me and a group of members to Half Moon Bay. S.K. had written a poem and so had I. My poem was about spiritual friendship, how was about the spiritual path and we recited out poems to each other. Later he claimed that we recited holy vows of marriage. He said this to the community at a community meeting. I was shocked! I never agreed to marry him! I wasn't legally divorced from my husband. There was no wedding, no witnesses, no reception - nothing! This was said without my consent. This man was 30 years older than me. He was old enough to be my grandfather and I did not want him to be a stepfather to my child! He though children were a nuisance anyway.

23. I was asked to speak at that community meeting. I said I agreed to be "mother" to the community. I was terrified of speaking in front of people, and really didn't say much. I was in confusion because I thought S. K. and I were spiritual friends that would lead the community side by side as friends. Obviously he took the soulmate things all the way to "marriage". People in the community congratulated us on our "marriage" after satsang was over.

24. When we got back to the house, I was very upset and very angry. I asked him to retract his statement. He said he could not and that I was asking him to humiliate himself.

25. I took off to Ashland, Oregon with my best friend at Ananda to sort things out. I returned to Ananda. S.K. hoped I was feeling my conducive to his plan for me.

26. One night after I had meditated and gone to bed, S.K. came up to my room, switched on the light and sat on the side of my bed. He said he was lonesome and hadn't felt the arms of a woman around him in so long. I imagined 30 years of celibacy as a monk. Now that he considering giving up his title of Swami to be a "householder" as he had a desire to be "married" and all. I felt sorry for him. So I held him. (Little did I know that he had been with many women before me while calling himself a Swami monk!) Then he wanted to kiss me. I resisted and kept turning my face away from him. Soon my blankets were thrown aside and my undies pulled off and he's holding me down while having intercourse with me. I totally disgusted and in shock. I felt totally violated and sickened. Here was a man who full trust and admiration as the leader of the community, a minister and a monk - revered by all and looked up to - having

sex with me! He was physically a turn off. He was overweight, balding, gray, and 30 year older! Yuck!

27. The next day I sought out by best friend but she wasn't at the community. I went to speak to Asha Praver instead. After I told her what happened and that I didn't feel good about it, she told me that I was supposed to take care of his needs. In other words, what Swami wants, he gets. I felt totally invalidated by her response. I felt used, betrayed and set up.

28. I decided to plan how to leave gracefully. I refused to sleep near him or have sex with him after that. He attempted to lure me again though. He asked me to rub his back (I often rubbed his shoulders and feet) then he rolled over with a hard-on and he put my hand on his penis. He tried to put his finger in my vagina. I said no- I can't do this. I got up and left the room.

29. Woman #2 came to me and S.K., was seeking her out for sexual favors and that she was confused and upset about it. I told her that I was leaving Ananda and that she should too.

30. A photographer showed up on the doorstep one morning to take pictures of S.K. and his "wife" for the upcoming book on spiritual marriage, and that Yoga Journal wanted pictures to publish with their article about S.K.'s "marriage". I lost my temper. I knew nothing about my picture being on his book or any article in a magazine. It was late fall and rainy, I called my brother to come and take me home. S.K. and I had a big altercation after I told him I was leaving.

31. S.K. accused me of carrying his child reneging on my spiritual duty to the community, leaving the spiritual path forever, giving up his spiritual mantle and thus spitting in his face, and being totally insane. Part of me was so brainwashed that I believed him. I had to prove him wrong on every count to get over the mind control.

32. I was a "blithering idiot" when I left Ananda. I didn't know who I was anymore. I convalesced at my Mother's and had Thanksgiving at my brother's house. I slowly rebuilt my identity, my ego. I felt betrayed. I was pregnant and frightened and depressed. After Christmas I went to Arizona to be with my husband. I was agoraphobic and had panic attacks. He promised to take care of me and help me recover. My daughter was born in March.

33. I had to provide S.K. with a blood test to prove to him that my child was not his. I began to take the SRF lessons, they nursed me back to mental health. I took Kriya from SRF in June of 1982. What a difference! In the last 10 years I found that all S.K.'s accusations of SRF were totally false. All of S.K.'s accusations of me and others were false. He had sought to publicly discredit and invalidate anyone who disagreed with him.

34. S.K. systematically stripped me of my ego, gave me an alter ego and controlled me by guilt and my desire to do the right thing.

35. For six years a friend of mine stuck by me until I started to reconcile my involvement with S.K. My friend was at Ananda and left just after I did.

36. I believe that Ananda is a cult. Its core members and ministers do much to keep the fraudulent image of S.K. alive.

37. S.K. is a con-man who preys on innocent people urging them to seek God at Ananda. S.K. and

Ananda uses true teaching to Yogananda to claim their integrity. There is no integrity- none at Ananda. Their "blissful" community is only a paper thin image. I am a lot wiser now after therapy and life experiences and I am 14 years older on the spiritual path. I have a much deeper understanding of what went on.

38. I have not any time conspired with anyone to file false allegation in any lawsuit against Donald Walters, or the Ananda Church and have never participated in any meeting with anyone toward such end.

SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO

Plaintiff, vs.

ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; DANNY LEVIN, individually and) as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION and CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;

No. 390 230

DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDENTS' MOTION FOR SUMMARY JUDGEMENT

I, XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of Nevada County, California. I could and would testify to the following in open court. I have first- hand knowledge of the following matters and facts.
2. In the time period of 1967-1969 I went to the Ananda community for a retreat. During one day, I and my four-year old son, went with a group of people led by Swami Kriyananda (also known as Donald Walters) went for a walk in the hills.
3. During the course of our walk we all went "skinny- dipping" in a pool of water. While in the water, Kriyananda reached under the water and touched my breasts with his hands. I drew away.
4. During the following evening of the same day, a few of us were sitting outside in the dark with Kriyananda who was sitting in a chair. I was sitting cross-legged on the ground near him. Suddenly, Kriyananda grabbed my head with his hands and thrust his crotch against the back of my head. I immediately pulled free, got up and left for my tent.
5. This incident was a shock to me. I took a while to assimilate the experience and its reality. I had been around Kriyananda many times and even alone with him while performing office work for him. I had never experienced this kind of behavior from him before. I loved and revered him as a high and holy person.
6. The next day I approached Kriyananda, shook my finger in his face, and said, "You should be ashamed of yourself." He simply replied, "Well, you went along with it." I then left Ananda and never came back. Kriyananda never made any effort to apologize or even account for his indecent behavior.

Under penalty of perjury and pursuant to the laws of the State of California, I hereby declare that the foregoing is true and correct.

Executed February 6, 1995, at the County of XXX, State of California.

I, XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of the county of XXX. I could and would testify to the following in open court. I have first-hand knowledge of the following matters and facts. For the purpose of privacy I am using my initials only. Counsel for counterdefendant knows my true identity and is authorized to disclose it to both the Court and counsel so that I can be identified and if necessary, deposed.
2. In 1969 I was part of a group that was led by Donald Walters, also-known as Swami Kriyananda. We were on a tour of college campuses.
3. At one point swami and I were alone together and he used me for sex.
4. The next morning when I was looking for my dress, I found it in his bed.
5. We had sex on two other occasions.
6. When I spoke of this to a friend of mine who was also an Ananda member, she said Swami had done the same thing with her.
7. Later, when I began to tell people what had happened, word got back to Swami. He cornered me by the washroom and said that he did not like me talking about the sex between us to anybody. He said that it was just between him and me and that "We were just having fun, anyway,"
8. I left Ananda in 1976.

Under penalty of perjury and pursuant to the laws of the State of California, I hereby declare that the foregoing is true and correct.

Executed February 7, 1995, at the County XXX, State of California.

Signed,

XXX

SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO Plaintiff, vs. ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; individually and as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;

No. 390 230

DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

I, XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of XXX, California.

I could and would testify to the following in open court. I have first hand knowledge of the Following matters and facts.

2. In 1981 I lived at a house in Sacramento, California, that was populated by persons who were members of the Ananda community and followers of J. Donald Walters who is also known as Swami Kriyananda. During this time, I was also widely known by the name "XXX"

3. During that time Donald Walters visited the house. While he was visiting he asked me to give a massage. I felt complimented he would do so because he was the leader of Ananda. Although he first asked me to massage him, he then told me that he wanted me to massage his genitals.

4. I was surprised at his suggestion and told him I was surprised that he, of all people, would ask me to perform such a massage. I said words to the effect that I was surprised that someone in his position would request such a thing.

5. In response Donald treated the issue as though it were of no great importance and acted as though he wanted to brush it off.

6. I am not, and never have been a member of Self-Realization Fellowship.

Under penalty of perjury and pursuant to the laws of the State of California, I hereby declare that the foregoing is true and correct.

Executed February 7, 1995, at Grass Valley, California.

Signed, XXX.

SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO Plaintiff, vs. ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; individually and as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;

No. 390 230

DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT:

I XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of xxx, State where I am a practicing psychotherapist. I could and would testify to the following in open court. I have firsthand knowledge of the following matters and facts.
2. I lived at Ananda from November of 1980 until October 1983.
3. I moved to Ananda when my marriage ended- my divorce was complete several months after I arrived. I went to Ananda feeling the need to heal from the ending of my marriage. The advertisements for Ananda promised peace, spiritual growth and a strong sense of community.
4. My first encounter with Donald Walleys (he was then called "Swami" or "Swami Kriyananda" by community members) was at least six months after my arrival- he had been traveling before that. I tearfully approached him about my divorce- at first he abruptly stated "well it's too late to worry about int now, isn't it?" Then as he saw my tears he relented a little, but had no time to discuss it as he was on his way to speak to the community.
5. I was very dedicated in my work at Anadna and regarded Swami as spiritual Father and the community members as my spiritual family. When I noticed things which made me morally uncomfortable- I rationalized that whatever "Swami" dictated (and his inner circle carried out) was the will of God because that is what they inculcated me to believe. Everything said by Swami Walleys and his ministers lead me to believe it.
6. Finally I was invited to a small gathering at "Swami's dome" (his home) - I was happy to be amongst those who designated themselves to be "high souls". Swami held my hand and another young nun's who was also new to the group. After that experience, Swami invited me over more and more frequently.
7. My first time alone with Swami was in San Francisco at the "Ananda House" there-as I was led up the back stairs to his bedroom by one of the nuns, (I was also a nun at the time- we nuns were considered part of the inner workings of the community and took vows of celibacy and simplicity- as did Swami. I was given knowing looks and encouraging comments by some of the inner circle who were in the back kitchen of this mansion. Swami said he wanted a foot rub and I had been chosen. As the nun left me at the door, I felt excited but humble about being given this great "opportunity" to serve. Swami disrobed in a large well-lit walk-in closet so quickly that I was shocked that. I could see his disrobing from where he had asked me to wait- he looked over to see if I was watching and I moved out of view so I could not see. He sat briefly in a

chair, with only a towel on for his foot rub. After a few moments he said he wanted a head rub instead as he stated he had a headache and "would I come over to the bed while he lay down to give him a head massage?" As I began to do so, he pulled me down to him and began kissing me- I tried to pull away several time and finally succeeded. He acted hurt and surprised and answered to my explications of dismay that he was only feeling a little blue and wasn't sure why I was uncomfortable. I left soon after.

8. This type of scene repeated itself a number of times although each time it became more couched in his terms of being "completely non-sexual" (as he knew that I believed in the monastic vows he had given me and taken for himself years before). He told me how sad he was about the loss of XXX (which was the name he directed XXX to be called at Ananda) and that he just "needed the balancing energies of a woman around".

I was flattered, felt like I was given this role to help him through a hard time, and tried to overlook my confusion about his intentions. Finally one evening he asked me to disrobe and lie naked on top of him he wore only underwear. Although confused, I agreed because he assured me it for healing only. He put my hand nest to his penis at the juncture of his inside thigh and crotch and stated he needed me to send "healing energy" through my hands to his arthritic hip (on the inside near his penis, he said that was where the pain was). I quickly became very uncomfortable, put on my clothes and said I must leave- he hugged me good-bye and smiled when I said that it was "strange to feel sexual energy between two monastics", I was disoriented and confused.

9. After that episode I began avoiding private contact with him. I moved from the living area where the nun's had their residences, since that was very near his dome and he had made at least two unexpected visits to my trailer while I lived there. I spent several months praying and agonizing over what this all meant- loyalty to Swami and the community had been drilled into my head. Seva, on of his oldest and closest friends (and the head nun) had come over to me expressing outrage and hurt that I had not gone to visit Swami when he was ill with influenza during that time- others spoke to me also, and slowly I became more and more aware that the "inner circle" were shunning me (as I had seen then do to others who disobeyed Swami). I felt they would only be shocked by my doubts.

10. Finally I decided to go to a psychologist whom I had come to know (as he had initially come to visit the spiritual services in the community on Sundays- He had become estranged after a while when he disagreed with Swami at times). I gingerly revealed the episodes with Swami to him. I asked if he thought I was misinterpreting Swami's intentions. I thought he would say yes- but he did not. In fact he said that several other women clients had expressed similar experiences to him. This confirmation of my worst fears finally convinced me that I must move away from the community.

11. It took me almost another year of working a side job to earn the money to leave (I had given all my money to Ananda when I had become a member and earned no or very little salary for the work I did there).

12. I moved to XXX and was able to live with a friend as I began to reestablish a life on the "outside" I had been very depressed in my last year at Ananda due to the stress of my relationship with Swami and my confusion about what it meant morally and spiritually. This depression abated somewhat after I left- but continued in a milder form for some years until I addressed the issues in therapy. But initially I spent most my time alone, mostly meditating and praying- hoping to find some comfort in that . My roommate was my main contact with the world and I cleaned houses to earn money- a very non- demanding

occupation for someone with a B.A. from Purdue.

13. Slowly I began to interact with others but it was two year before I would date men. It was difficult for me to trust my own judgment in general a bout men's character in particular and I attribute this to the manipulation I had e experienced with Swami.

14. After a couple of years of psychotherapy I had regained my self-esteem and trust. Under penalty of perjury and pursuant to the laws of the State of California, I hereby delare that the foregoing is true and correct.

SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO Plaintiff, vs. ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; individually and as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;

No. 390 230

DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT:

I XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of XXX. I could and would testify to the following in open court. I have firsthand knowledge of the following matters and facts.
2. I was a resident member of Ananda form 1972 to 1985. During that time, I heard rumors of sexual affairs between Swami Kriyananda, also known as Donald Walters, and female Ananda members. At that time, I paid little, if any, attention to these rumors.
3. Before her death in 1987, my wife confessed to me prior to our marriage she sexual liaisons with Kriyananda.
4. After this I heard about other women having similar experiences.
5. It was a painful realization because I had genuine affection and love for Ananda members and Kriyananda.

Under penalty of perjury and pursuant to the laws of California, I hereby declare that the foregoing is true and correct.