

EXHIBIT 14

James A. Meyer April 18, 2007

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE NATIONAL SPIRITUAL ASSEMBLY OF
THE BAHAI'S OF THE UNITED STATES OF
AMERICA UNDER THE HEREDITARY
GUARDIANSHIP, INC.,

Counter-Defendant,

vs.

Civil Action No. 64 C 1878
The Honorable Amy J. St. Eve

NATIONAL SPIRITUAL ASSEMBLY OF
THE BAHAI'S OF THE UNITED STATES
OF AMERICA, INC.,

Counterclaimant.

VIDEO DEPOSITION OF JAMES A. MEYER

April 18, 2007

3:03 p.m.

Bean & Associates, Inc.

500 Marquette, N.W., Suite 280
Albuquerque, New Mexico 87102

PURSUANT TO THE FEDERAL RULES OF CIVIL
PROCEDURE, this deposition was:

TAKEN BY: MR. CHRISTOPHER M. DOLAN
Attorney for the Counterclaimant

REPORTED BY: Jan A. Williams, RPR, CCR 14
Bean & Associates, Inc.
Professional Court Reporting Service
500 Marquette, Northwest, Suite 280
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(3622A) JAW

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1 APPEARANCES
 2 For the Counter-Defendant:
 3 MR. JEFFREY A. GOLDBERG
 4 P.O. Box 254
 5 Albuquerque, New Mexico 87103-0254
 6 505-321-2932

7 For the Counterclaimant:
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 10 455 N. Cityfront Plaza Drive
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 12 312-321-4200
 13 BY: MR. CHRISTOPHER M. DOLAN

14 Also Present:
 15 MARILYN K. MEYER
 16 DALE ALVERSON, Videographer

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 7 EXHIBITS MARKED OR FORMALLY IDENTIFIED
 8 NUMBER

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|---|----|
| 71 - Letter, undated, with attachments | 13 |
| 9 72 - Envelope with attached letter, 10/5/65 | 14 |
| 73 - Letter, 1/24/66 | 15 |
| 10 74 - Letter, 1/14/66 | 16 |
| 75 - Letter, 2/14/66 | 17 |
| 11 76 - Memo, 1/10/66 | 18 |
| 77 - Letter, 6/8/66, with attachment | 19 |
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| 79 - Letter, 9/13/66 | 21 |
| 13 80 - Memo, undated | 22 |
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| 14 82 - (retained by counsel) | |
| 83 - Narrative, undated | 23 |
| 15 84 - (retained by counsel) | |
| 85 - Checkbook documents | 26 |
| 16 86 - (retained by counsel) | |
| 87 - Glad Tidings, June 1966 | 11 |

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1 THE VIDEOGRAPHER: We are on the record. The
 2 date is April 18, 2007. The time now is approximately
 3 3:03 p.m. Mountain time. This is the videotaped
 4 deposition of James Meyer in the matter of the
 5 National Spiritual Assembly of the Baha'is of the
 6 United States of America Under the Hereditary
 7 Guardianship, Incorporated, versus National Spiritual
 8 Assembly of the Baha'is of the United States of
 9 America, Incorporated, Case No. 64 C 1878, in the
 10 United States District Court for the Northern District
 11 of Illinois, Eastern Division.

12 We are in the offices of Bean & Associates at
 13 500 Marquette, Northwest, Suite 280, Albuquerque, New
 14 Mexico, 87102. The videographer is Dale Alverson.
 15 The court reporter is Jan Williams.

16 And will the attorneys please introduce
 17 themselves for the record.

18 MR. DOLAN: Christopher M. Dolan on behalf of
 19 National Spiritual Assembly.

20 MR. GOLDBERG: And Jeffrey A. Goldberg on
 21 behalf of the orthodox Baha'i respondents.

22 THE VIDEOGRAPHER: Thank you. And will the
 23 reporter please swear in the witness.

24 JAMES A. MEYER,
 25 after having been first duly sworn under oath,

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1 was questioned and testified as follows:
 2 EXAMINATION
 3 BY MR. DOLAN:
 4 Q. Mr. Meyer, could you please state and spell
 5 your name for the record.
 6 A. James A. Meyer. You want me to spell it,
 7 both of them? J-a-m-e-s, A middle initial, M-e-y-e-r.
 8 Q. And what is your home address?
 9 A. Number 6, Meyer Road.
 10 Q. And what town?
 11 A. Espanola.
 12 Q. Okay. Have you been deposed before?
 13 A. Been to what?
 14 Q. Have you been deposed before?
 15 A. No.
 16 Q. You sat in on the deposition of Marilyn Meyer
 17 earlier. Did you hear all the instructions that I
 18 gave her regarding how the deposition would proceed?
 19 A. Yes.
 20 Q. Okay. Did you understand all of those?
 21 A. Most of them.
 22 Q. Okay. Is there anything you didn't
 23 understand?
 24 A. No.
 25 Q. Okay. Did you review any documents prior to

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| <p>1 today's deposition? 2 A. Prior to today's -- not very many. 3 Q. Okay. Do you recall any of the documents 4 that you did review? 5 A. Not just offhand I don't. I mean, you know. 6 Q. Were they documents that were produced in 7 discovery in this case? 8 A. Not that I recall. 9 Q. Okay. Did you communicate with anyone 10 regarding the substance of your testimony that you 11 were going to give today? 12 A. No. 13 Q. If you could take a look at an exhibit 14 sitting on the stack in front of you, it's marked as 15 Exhibit No. 30. 16 MS. MEYER: You want to help him there, Jeff. 17 He doesn't see well. 18 MR. GOLDBERG: He's got it. 19 BY MR. DOLAN: 20 Q. It's titled Our Story. 21 A. Our Story. Yeah. Okay. 22 Q. Do you recognize this document? 23 A. I recognize the name, and my wife and I both 24 put it out. 25 Q. Okay. Do you see at the beginning it</p> | <p>1 Q. Okay. You don't recall either way? 2 A. No. 3 Q. Okay. Do you have a specific recollection of 4 who Adie Petzoldt learned the Baha'i faith from? 5 A. Out of the Bible, but not as a person. 6 Q. Okay. Did he learn it from another Baha'i? 7 A. I couldn't tell you that, I really don't 8 know. 9 Q. Okay. So, when you said that he didn't learn 10 it from Leland Jensen, you don't actually know that to 11 be true? 12 A. I don't know that to be true. 13 Q. Okay. Were you a member of the Orthodox 14 Baha'i Faith under Mason Remy? 15 A. Yes. 16 MR. GOLDBERG: Objection. The Orthodox 17 Baha'i Faith is not the name of the Remy 18 organization. 19 BY MR. DOLAN: 20 Q. Okay. Were you a member of the Mason 21 Remy -- 22 A. Yes. 23 Q. -- followers under the Hereditary 24 Guardianship? 25 A. Mason Remy.</p> |
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| <p>1 describes James Meyer as a young man under the 2 tutelage of his minister, A.S. Petzoldt? 3 A. Right. 4 Q. What's A.S.'s first name? 5 A. Adie. 6 Q. Adie Petzoldt of Quincy, Illinois. And it 7 goes on to say that Adie Petzoldt had found the Baha'i 8 faith. Do you see that? 9 A. That's right. 10 Q. Do you know who he learned of the Baha'i 11 faith through? 12 A. Who he learned? He learned by discovering it 13 out of the Bible, the year 1844. He was a minister. 14 Q. Did he learn specifically of the Baha'i faith 15 from Leland Jensen? 16 A. No. 17 Q. Do you know if Adie Petzoldt ever recognized 18 Joel B. Marangella as the third guardian? 19 A. Not that I know of. 20 Q. So he never joined the orthodox Baha'i faith? 21 MR. GOLDBERG: Objection. 22 THE WITNESS: No. 23 MR. GOLDBERG: He doesn't -- he already said 24 he didn't have any knowledge of it. 25 BY MR. DOLAN:</p> | <p>1 Q. Did you hold any leadership positions with 2 that group? 3 A. No. 4 Q. Were you on the National Spiritual Assembly 5 of that group? 6 A. No. 7 Q. Do you recall sitting in on Marilyn's 8 deposition earlier when we went through several issues 9 of Glad Tidings? 10 A. Yes. 11 Q. And they indicated that you were, in fact, on 12 the NSA? 13 A. I don't recall it. Yes, I can -- I read it 14 when you guys pulled it out. But I don't recall the 15 dates. 16 Q. Okay. Well, you stated no. But your answer 17 is you don't recall? 18 A. I don't recall. 19 Q. Okay. Do you have any reason to think those 20 documents would be incorrect? 21 A. No. 22 Q. Are you currently on the Provisional National 23 Baha'i Council? 24 A. On the council, yes. 25 Q. You're on the nine-member council?</p> |

3 (Pages 6 to 9)

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| <p>1 A. Yes.</p> <p>2 Q. How long have you been on the Provisional</p> <p>3 National Baha'i Council?</p> <p>4 A. I don't remember the year. I don't remember</p> <p>5 the year.</p> <p>6 Q. Can you approximate?</p> <p>7 A. Not really.</p> <p>8 Q. No. Okay.</p> <p>9 A. I don't remember the dates at all.</p> <p>10 Q. Okay. Has it been more than five years?</p> <p>11 A. I would say it was about '02.</p> <p>12 Q. Okay. Thank you. Do you attend meetings of</p> <p>13 the Provisional National Baha'i Council?</p> <p>14 A. Yes.</p> <p>15 Q. And do you have a vote with respect to its</p> <p>16 endeavors?</p> <p>17 A. Yes.</p> <p>18 Q. And do you, in fact, vote?</p> <p>19 A. Yes, I do.</p> <p>20 Q. Do you recall that the Remy NSA voted to sue</p> <p>21 the NSA in Wilmette back in 1964?</p> <p>22 A. I recall they were going to sue, yes.</p> <p>23 Q. Do you recall if you attended that meeting in</p> <p>24 which that was decided?</p> <p>25 A. I don't recall.</p> | <p>1 National Spiritual Assembly were announced at the</p> <p>2 recent national convention. These elections and the</p> <p>3 officers will hold during next year are James Meyer,</p> <p>4 chairman."</p> <p>5 Q. That's you?</p> <p>6 A. Yes.</p> <p>7 Q. And you were the chairman --</p> <p>8 A. I was the chairman.</p> <p>9 Q. -- of the NSA. Okay. Thanks.</p> <p>10 A. Yes.</p> <p>11 Q. You don't have to read the rest. Do you</p> <p>12 recall a place called the Jamal Baha'i Center in Santa</p> <p>13 Fe County?</p> <p>14 A. Yes.</p> <p>15 Q. Where was that located?</p> <p>16 A. That was on our property.</p> <p>17 MS. MEYER: No.</p> <p>18 MR. GOLDBERG: Marilyn, you can't testify.</p> <p>19 Please try to refrain from doing that.</p> <p>20 MS. MEYER: All right.</p> <p>21 THE WITNESS: That's hard for her.</p> <p>22 MR. DOLAN: It's a habit. Okay.</p> <p>23 BY MR. DOLAN:</p> <p>24 Q. You stated it was on your property?</p> <p>25 A. In Santa Fe County.</p> |
| <p>Page 11</p> <p>1 Q. I'm going to hand you an exhibit that we'll</p> <p>2 have to mark here. It's OBF 480. And we used it in</p> <p>3 connection with Marilyn's deposition as well.</p> <p>4 (Exhibit No. 87 was marked.)</p> <p>5 MR. GOLDBERG: What's the exhibit number?</p> <p>6 MR. DOLAN: It's not on that copy.</p> <p>7 BY MR. DOLAN:</p> <p>8 Q. Is this an issue of Glad Tidings?</p> <p>9 A. Yes, it is.</p> <p>10 Q. And what's the date on it?</p> <p>11 A. November.</p> <p>12 Q. Okay. Do you see, on the right-hand column,</p> <p>13 there's a story about the NSA being elected?</p> <p>14 A. Election?</p> <p>15 Q. Yeah.</p> <p>16 A. Yeah.</p> <p>17 Q. Could you read that into the record, please.</p> <p>18 A. I can't see it very good to tell you the</p> <p>19 truth.</p> <p>20 Q. Okay. Well, take your time.</p> <p>21 A. Which one, how far down do you want to read,</p> <p>22 from the top down?</p> <p>23 Q. Yeah, just from the top down, where it</p> <p>24 starts.</p> <p>25 A. "The results of the annual election of the</p> | <p>Page 13</p> <p>1 Q. Okay.</p> <p>2 A. I mixed it up with Illinois, because we call</p> <p>3 that Jamal Oaks.</p> <p>4 Q. Okay. I've got an exhibit for you, it's</p> <p>5 Exhibit No. 71.</p> <p>6 (Exhibit No. 71 was marked.)</p> <p>7 BY MR. DOLAN:</p> <p>8 Q. Do you see your signature on this document --</p> <p>9 A. Yeah.</p> <p>10 Q. -- at the bottom?</p> <p>11 A. Right.</p> <p>12 Q. Is that your signature?</p> <p>13 A. That's my signature.</p> <p>14 Q. Okay. And this is a letter to Donald Frey of</p> <p>15 Evanston, Illinois; is that correct?</p> <p>16 A. That's right.</p> <p>17 Q. What's this pertaining to?</p> <p>18 A. That's the lawsuit.</p> <p>19 Q. Okay. And it looks as though you are giving</p> <p>20 comments on the complaint that Donald Frey was to</p> <p>21 file; is that correct?</p> <p>22 A. If that's what it says. Like I say it's been</p> <p>23 too long ago, I can't remember that.</p> <p>24 Q. Okay. Was Donald Frey the attorney that</p> <p>25 handled the case for you?</p> |

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| <p>1 A. He was the attorney. 2 Q. If you flip into the second page, you see 3 there's a byline at the top reading September 13, 4 1965, from Espanola, New Mexico. That's where you 5 lived at that time, right? 6 A. Right. 7 Q. Then it looks like detailed commentary on the 8 complaint. Do you see that? If you turn to the next 9 page, your signature appears again at the bottom of 10 the page. 11 A. Okay. 12 Q. Is that your signature at the bottom of that 13 page as well? 14 A. Yes, it is. 15 Q. And the next page is the complaint itself, if 16 you can confirm that? Does that look to be the 17 complaint in the matter from the 1960s? 18 A. It looks like it. 19 Q. Okay. Thank you. 20 (Exhibit No. 72 was marked.) 21 BY MR. DOLAN: 22 Q. I've got another exhibit for you, it's 23 Exhibit 72. Does this appear to be Mr. Frey's 24 response to your comments? 25 A. It does, yes.</p> | <p>1 Q. -- paragraph. Okay. Then at the bottom 2 there's a paragraph I want to ask you about. It says 3 "I shall reserve drafting a consolidated memorandum of 4 settlement until you have forwarded to me the 5 communication you expect to receive from either the 6 guardian or from Joel Marangella." Do you see that 7 language? 8 A. Yes. 9 Q. Was that as you recall it the procedure that 10 the attorney usually employed? 11 A. I don't recall, I really don't. 12 (Exhibit No. 74 was marked.) 13 BY MR. DOLAN: 14 Q. I'm handing you what's been marked as Exhibit 15 74. This appears to be a letter from Marion Rhodes to 16 Donald Frey. Do you see that? 17 A. Yes. 18 Q. Who is Marion Rhodes? 19 A. Old time member of the faith and Frank's 20 mother. 21 Q. Is that his mother-in-law or his mother? 22 A. His mother-in-law. 23 Q. Okay. Did you see this is dated January 14, 24 1966; is that correct? 25 A. Yeah, it's up there.</p> |
| <p>Page 15</p> <p>1 Q. That's addressed to you. And he states -- he 2 was thanking you for the changes to the draft 3 complaint, correct? It's dated October 5, 1965; is 4 that right? 5 A. Right. 6 (Exhibit No. 73 was marked.) 7 BY MR. DOLAN: 8 Q. I have another exhibit for you, it's No. 73. 9 And it's OBF 1377. Do you recognize this letter? 10 A. I recognize it, yeah. 11 Q. Do you. It appears you were copied on it, 12 it's a letter from Donald Frey, correct? 13 A. This is from Petzoldt. 14 Q. I think it's to Petzoldt and you were copied 15 on it. Do you see that? 16 A. A.S. Petzoldt up at the top, right. 17 Q. And there's a letterhead above that that says 18 Donald S. Frey? 19 A. Okay. 20 Q. Do you see that? 21 A. Yes. 22 Q. Okay. It's stating that he studied, in the 23 second paragraph, Mr. and Ms. Meyer's letter of 24 January 16. Do you see that -- 25 A. Yeah, right.</p> | <p>Page 17</p> <p>1 Q. If you look at the fourth paragraph that 2 starts now that we. 3 A. Okay. 4 Q. Ms. Rhodes makes a comment that she is 5 enclosing her "own views on what negotiating might 6 entail, but this really belongs in the hands of 7 Mr. Remey, Joel Marangella, Mr. Petzoldt, and along 8 with Mr. Byers." Do you see that? 9 A. Uh-huh. 10 Q. Is that your recollection of how that case 11 was handled as well? 12 A. I really don't remember. 13 (Exhibit No. 75 was marked.) 14 BY MR. DOLAN: 15 Q. I'm handing you now Exhibit 75. It's OBF 16 1384. Do you recognize this document? 17 A. Let me read a little bit here and see. 18 Q. Sure, take your time. 19 A. I recognize it. 20 Q. This is a letter that you sent? 21 A. Sent by us, yes, the vice chairman, yes. 22 Q. James Meyer, vice chairman, is that what it 23 says? 24 A. Yes. 25 Q. And this was sent to Donald Frey in Evanston,</p> |

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| <p>1 Illinois? 2 A. Yes. 3 Q. And it's dated February 14, 1966; is that 4 correct? 5 A. Right. 6 Q. Okay. In substance of it that you just read 7 through, you're relaying Joel Marangella's statements 8 about settlement negotiations; is that correct? 9 A. Well, that's what it says in the letter, yes. 10 (Exhibit No. 76 was marked.) 11 BY MR. DOLAN: 12 Q. I've got an Exhibit No. 76 for you now. What 13 is this document? 14 A. I do not recall it at all. 15 Q. Okay. It's dated January 10, 1966, correct? 16 A. Right. 17 Q. Do you recall the fact relayed here, that the 18 NSA under Remy paid for Joel B. Marangella's 19 expenses? 20 A. I do not, no. 21 Q. Okay. Could you pull out Exhibit 61 from -- 22 MR. GOLDBERG: Is it sticking out already? 23 MR. DOLAN: Yeah, it's right there. 24 THE WITNESS: Oh, this one? 25 BY MR. DOLAN:</p> | <p>1 of people that apparently approved this action by the 2 attorney, the mail ballot. Only first names are 3 provided. 4 A. Yes. 5 Q. But these would be NSA members at the time; 6 is that correct? 7 A. Yes. 8 Q. Do you see there there's Frank, is that Frank 9 Schlatter? 10 A. Frank, Les. 11 Q. What's Les' last name? 12 A. Vorndam. 13 Q. Okay. And who is Louise? 14 A. Louise Vorndam. 15 Q. And Marion? 16 A. Rhodes. 17 Q. Okay. And Marilyn? 18 A. Marilyn Meyer. 19 Q. And then there's a Madeline I believe at the 20 end; is that correct? 21 A. Madeline, yeah. I guess that's what -- 22 pretty hard to read, but I think that's what it is, 23 yeah. 24 Q. Would that be Madeline Byers? 25 A. Madeline Byers.</p> |
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| <p>1 Q. Ms. Meyer identified this document earlier, 2 but I'll see if you also recognize it. If you look at 3 the last page, I think you'll see your names are 4 signed to it. 5 A. Yeah. 6 Q. Do you recognize that letter as something 7 that you sent out? 8 A. Well, I don't -- I don't really recognize the 9 letter. But I know that we sent these kind of things 10 out. But I don't recognize just word for word on the 11 letter, no. 12 (Exhibit No. 77 was marked.) 13 BY MR. DOLAN: 14 Q. I understand. Okay. If you could take a 15 look at Exhibit No. 77, please. It's OBF 5180. This 16 appears to be a mail ballot; is that correct? If you 17 flip to the second page, I think you'll see a letter 18 from you to Adie Petzoldt. Is that your signature? 19 A. Yes, it is. 20 Q. Okay. If you take a look at it, does this 21 reflect instructions to Mr. Frey regarding settlement 22 proposals in the litigation of the 1960s? 23 A. It authorizes Dr. Frey. 24 Q. Okay. And then, if you turn back to the 25 first page dated June 8, 1966, it lists several names</p> | <p>1 (Exhibit No. 78 was marked.) 2 BY MR. DOLAN: 3 Q. I'm going to have Exhibit 78 for you here. 4 This is OBF 1051. If you look at the last page, it 5 indicates that it was sent by James A. Meyer and 6 Marilyn Meyer. Do you see that? 7 A. Yes, it is. 8 Q. And it appears to be edits to conclusions of 9 law and findings of fact for the council in the 10 litigation. Is that what this looks like to you? 11 A. That's what it looks like, yes. 12 Q. Do you see that it was sent to -- on the top 13 line, to all NSA, to guardian, to J. Marangella? 14 A. Uh-huh. 15 Q. And to U.S. IBC members? Do you see that? 16 A. Yes. 17 (Exhibit No. 79 was marked.) 18 BY MR. DOLAN: 19 Q. I'm handing you now Exhibit 79. Again, if 20 you look at the second page, it appears to be a letter 21 from you. Would you clarify if that's your signature 22 there. 23 A. That's my signature. 24 Q. And you've got a title there, Chairman NSA. 25 Do you see that, just under your signature?</p> |

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| <p>1 A. Yes.</p> <p>2 Q. And if you could just note, there are copies</p> <p>3 sent. Who were those sent to? I think, on the second</p> <p>4 page, it indicates all NSA, John Byers, and Joel</p> <p>5 Marangella. Do you see that? Way down at the bottom,</p> <p>6 it's the last thing.</p> <p>7 A. Okay.</p> <p>8 Q. Okay. And this letter was addressed to</p> <p>9 Charles Mason Remy, Second Guardian, titled Baha'i</p> <p>10 World Faith. Do you see that at the top?</p> <p>11 A. Yes.</p> <p>12 Q. Now, does this -- if you look through this</p> <p>13 letter, does this relate to the injunction that was</p> <p>14 issued in 1966 in this litigation?</p> <p>15 A. Yes.</p> <p>16 (Exhibit No. 80 was marked.)</p> <p>17 BY MR. DOLAN:</p> <p>18 Q. I'm handing you now Exhibit No. 80. Would</p> <p>19 you take a look at the second page and confirm that</p> <p>20 that's your signature on this document.</p> <p>21 A. That is my signature.</p> <p>22 (Exhibit No. 81 was marked.)</p> <p>23 BY MR. DOLAN:</p> <p>24 Q. Okay. I'm handing you Exhibit No. 81. This</p> <p>25 is OBF 5933. It's marked at the top Personal. Do you</p> | <p>1 A. I don't recall receiving it. That's why I</p> <p>2 was reading it, to see if I could.</p> <p>3 Q. Okay.</p> <p>4 A. But I don't recall receiving it.</p> <p>5 Q. If you look at the last page, it says who it</p> <p>6 was signed by.</p> <p>7 A. I seen that there.</p> <p>8 Q. Are these all people that were involved with</p> <p>9 the Remy corporation and Remy group in the 1960s?</p> <p>10 A. Yes.</p> <p>11 Q. Are any of them involved with the -- what you</p> <p>12 call the Orthodox Baha'i Faith now?</p> <p>13 A. Only one, Frank Schlatter.</p> <p>14 Q. There are several other Schlatters there too.</p> <p>15 Are they no longer involved?</p> <p>16 A. No.</p> <p>17 Q. That's -- but they were at one time?</p> <p>18 A. Let's see, you've got -- it's pretty hard to</p> <p>19 read there. Let's see.</p> <p>20 MR. GOLDBERG: Can you clarify the question.</p> <p>21 You mean involved with the OBF?</p> <p>22 MR. DOLAN: I do.</p> <p>23 MR. GOLDBERG: Is that what you mean?</p> <p>24 THE WITNESS: No, just Frank on this one.</p> <p>25 BY MR. DOLAN:</p> |
| Page 23 | Page 25 |
| <p>1 recall this letter?</p> <p>2 A. I don't recall the letter, but --</p> <p>3 Q. Do you know who it was from?</p> <p>4 A. It had to be from Frank Schlatter.</p> <p>5 Q. Frank Schlatter. Thanks. Do you have any</p> <p>6 independent recollection of what he was referring to</p> <p>7 in this letter when he said "There are future legal</p> <p>8 implications in the material given here. I cannot go</p> <p>9 into details because in the future I do not want any</p> <p>10 question of collusion involved"?</p> <p>11 A. I read that and it doesn't strike any bell.</p> <p>12 Q. You don't remember what that's about?</p> <p>13 A. No, I sure don't.</p> <p>14 MR. DOLAN: Go off the record for a moment.</p> <p>15 THE VIDEOGRAPHER: We are off the record.</p> <p>16 The time now is 3:35 p.m.</p> <p>17 (Recess.)</p> <p>18 THE VIDEOGRAPHER: We are back on the record.</p> <p>19 The time now is 3:40 p.m.</p> <p>20 (Exhibit No. 83 was marked.)</p> <p>21 BY MR. DOLAN:</p> <p>22 Q. Mr. Meyer, I'm handing you Exhibit No. 83</p> <p>23 now. It's OBF 4689. Would you take a look and let me</p> <p>24 know if you recall this document. Do you recall</p> <p>25 receiving this letter?</p> | <p>1 Q. Was Carole Schlatter involved with the OBF?</p> <p>2 A. Carole, but it says --</p> <p>3 MR. GOLDBERG: It's hard to read.</p> <p>4 BY MR. DOLAN:</p> <p>5 Q. It is hard to read.</p> <p>6 A. -- Pat, Pat Schlatter.</p> <p>7 MR. GOLDBERG: It says Carole right here.</p> <p>8 THE WITNESS: Oh, yeah. Carole and Frank.</p> <p>9 Okay.</p> <p>10 BY MR. DOLAN:</p> <p>11 Q. Do you recall that Marita McClymonds was</p> <p>12 involved with the OBF as well?</p> <p>13 A. I don't recall that.</p> <p>14 Q. Okay. And Les Vorndam?</p> <p>15 A. Les Vorndam has passed away. No.</p> <p>16 Q. But he was involved with the OBF? Do you</p> <p>17 recall either way?</p> <p>18 A. What's that?</p> <p>19 Q. Do you recall if Les Vorndam was involved</p> <p>20 with the OBF?</p> <p>21 A. I don't recall that, no. I don't recall when</p> <p>22 they all passed away. They're gone.</p> <p>23 Q. A lot of those people are deceased on that</p> <p>24 list, is that what you're saying?</p> <p>25 A. Oh, yeah. How many of them. One, two,</p> |

7 (Pages 22 to 25)

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James A. Meyer April 18, 2007

| | |
|---|--|
| <p style="text-align: right;">Page 26</p> <p>1 three, four, five. Five of them passed away off of 2 that list. 3 (Exhibit No. 85 was marked.) 4 BY MR. DOLAN: 5 Q. We're going to hand you Exhibit 85 now. This 6 is a reproduction of a checkbook that you produced to 7 us when we were on your property in Espanola. And it 8 appears to be the Remy group NSA's expense reports 9 and check ledger. Do you recognize it at all? 10 A. No. I never got into that part. 11 Q. Okay. Do you see the dates along the 12 left-hand column, the first page, it says 5/31/1965? 13 A. 6/30/65 on that one. 6/30, yeah, I see it 14 down there at the bottom, yeah. Is that 24 or five? 15 Q. Well, if you look at OBF page No. 6330. 16 A. Okay. 17 Q. You see some of the -- some of the entries 18 there are for checks written to Marilyn Meyer. Do you 19 see that? 20 A. Yes. 21 Q. And there's a check written to Charles Mason 22 Remy -- 23 A. Yes. 24 Q. -- there as well. And it's described as 25 guardian's fund. Do you see that?</p> | <p style="text-align: right;">Page 28</p> <p>1 Q. Who is that person? 2 A. I do not remember, I sure don't. 3 Q. It seems to indicate he was on the IBC. Is 4 that what that indicates to you? 5 A. I sure don't know Bernard. 6 Q. Do you recall payments being made by the NSA 7 to the second International Baha'i Council? 8 A. No, I sure don't. 9 Q. But did you refer to the second International 10 Baha'i Council as IBC back at that time? 11 A. International Baha'i Council? 12 Q. Uh-huh. 13 A. I don't remember, I sure don't. 14 Q. Okay. 15 A. That's the first time I ever seen this list. 16 Q. It's in the national archives. 17 A. That don't mean nothing. 18 Q. Do you remember, we were discussing 19 mimeograph machine earlier? 20 A. Yeah. 21 Q. Do you know how long you had that machine? 22 A. When did they go out of date? I don't 23 remember. Several years. It finally ended up in 24 Roswell. 25 Q. It ended up in Roswell?</p> |
| <p style="text-align: right;">Page 27</p> <p>1 A. Uh-huh. 2 Q. So is this -- would this be the Remy NSA's 3 check ledger do you think? 4 A. It had to be. 5 Q. Okay. If you look at the next page please, 6 do you see that there are check entries to Franklin P. 7 Schlatter? 8 A. Okay. 9 Q. Do you see those? 10 A. The one up at the top there? 11 Q. Yes. 12 A. Yeah. 13 Q. Okay. Then if you turn to 6332, please. At 14 the bottom of the page, there's a check ledger entry 15 for Joel B. Marangella. Do you see that? 16 A. Uh-huh. 17 Q. If you continue through these, there are 18 multiple references to -- or multiple payments to Joel 19 B. Marangella and Mason Remy. And I want to direct 20 your attention to one other. If you would turn to 21 6339, please. 22 A. Okay. 23 Q. Do you see the entry third from the bottom to 24 Bernard Fillon? 25 A. Uh-huh.</p> | <p style="text-align: right;">Page 29</p> <p>1 A. Yeah, after we were done with it. 2 Q. When was that? 3 A. I don't know the year. 4 Q. Was it in the 1980s? 5 A. Oh, it had to be before that. 6 Q. Why did it end up in Roswell? 7 A. Because they were doing the printing at that 8 time. 9 Q. Who was doing the printing at that time? 10 A. The whole group down there, Frank and all the 11 people that were down there. 12 Q. What group is that? 13 A. Mother Baha'i Council. 14 Q. Did you and Marilyn contribute archival 15 material to the national archives of your group as 16 well, your own materials? 17 A. Anything -- anything that we had that was 18 pertinent to the archives we put in there. 19 Q. That would include materials from the 1960s? 20 A. Whatever came up at that time, yeah. 21 MR. DOLAN: Okay. All right. I have nothing 22 further. 23 MR. GOLDBERG: I don't have anything. 24 MR. DOLAN: Thank you very much. 25 THE VIDEOGRAPHER: This concludes today's</p> |

8 (Pages 26 to 29)

James A. Meyer April 18, 2007

Page 30

1 videotaped deposition of James Meyer. The time now is
 2 3:50 p.m. We are off the record.
 3 (At 3:50 p.m. the deposition was concluded.)
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Page 31

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE NORTHERN DISTRICT OF ILLINOIS
 3 EASTERN DIVISION
 4 THE NATIONAL SPIRITUAL ASSEMBLY OF
 5 THE BAHAI'S OF THE UNITED STATES OF
 6 AMERICA UNDER THE HEREDITARY
 7 GUARDIANSHIP, INC.,
 8
 9 Counter-Defendant,
 10
 11 vs. Civil Action No. 64 C 1878
 12 The Honorable Amy J. St. Eve
 13 NATIONAL SPIRITUAL ASSEMBLY OF
 14 THE BAHAI'S OF THE UNITED STATES
 15 OF AMERICA, INC.,
 16
 17 Counterclaimant.
 18
 19 CERTIFICATE OF COMPLETION OF DEPOSITION
 20 I, JAN A. WILLIAMS, New Mexico CCR #14, DO
 21 HEREBY CERTIFY that on April 18, 2007, the deposition
 22 of JAMES A. MEYER was taken before me at the request
 23 of, and sealed original retained by:
 24
 25 For the Counterclaimant:
 BRINKS HOFER GILSON & LIONE
 NBC Tower - Suite 3600
 455 N. Cityfront Plaza Drive
 Chicago, Illinois 60611-5599
 MR. CHRISTOPHER M. DOLAN
 I FURTHER CERTIFY that copies of this
 certificate have been mailed or delivered on _____,
 with changes, if any, by the witness appended, to the
 following counsel of record and parties not
 represented by Counsel:
 For the Counter-Defendant:
 MR. JEFFREY A. GOLDBERG
 P.O. Box 254
 Albuquerque, New Mexico 87103-0254
 I FURTHER CERTIFY that examination of this
 transcript and signature of the witness was requested
 by the witness and all parties present.

Page 32

1 On _____, a letter was mailed or
 2 delivered to MR. JEFFREY A. GOLDBERG regarding
 3 obtaining signature of the witness.
 4 I FURTHER CERTIFY that the recoverable cost
 5 of the original and one copy of the deposition,
 6 including exhibits, to MR. CHRISTOPHER M. DOLAN is
 7 \$ _____.
 8
 9 I FURTHER CERTIFY that I did administer the
 10 oath to the witness herein prior to the taking of this
 11 deposition; that I did thereafter report in
 12 stenographic shorthand the questions and answers set
 13 forth herein, and the foregoing is a true and correct
 14 transcript of the proceeding had upon the taking of
 15 this deposition to the best of my ability.
 16
 17 I FURTHER CERTIFY that I am neither employed
 18 by nor related to nor contracted with (unless excepted
 19 by the rules) any of the parties or attorneys in this
 20 case, and that I have no interest whatsoever in the
 21 final disposition of this case in any court.
 22
 23
 24
 25

 JAN A. WILLIAMS
 Certified Court Reporter #14
 License Expires: 12/31/07
 (3622A) JAW
 Date taken: April 18, 2007
 Proofread by: JB

Page 33

1 NSA (Hereditary) vs. NSA
 2 WITNESS SIGNATURE/CORRECTION PAGE
 3 If there are any typographical errors to your
 4 deposition, indicate them below:
 5
 6 PAGE LINE
 7 _____ Change to _____
 8 _____ Change to _____
 9 _____ Change to _____
 10 Any other changes to your deposition are to
 11 be listed below with a statement as to the reason for
 12 such change.
 13 PAGE LINE CORRECTION REASON FOR CHANGE
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 I, JAMES A. MEYER, do hereby certify that I
 20 have read the foregoing pages of my testimony as
 21 transcribed and that the same is a true and correct
 22 transcript of the testimony given by me in this
 23 deposition on April 18, 2007, except for the changes
 24 made.
 25

 DATE SIGNED JAMES A. MEYER
 (3622A) JAW
 Proofed by: JB

James A. Meyer April 18, 2007

Page 34

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE NORTHERN DISTRICT OF ILLINOIS
 3 EASTERN DIVISION
 4 THE NATIONAL SPIRITUAL ASSEMBLY OF
 5 THE BAHAI'S OF THE UNITED STATES OF
 6 AMERICA UNDER THE HEREDITARY
 7 GUARDIANSHIP, INC.,
 8
 9 Counter-Defendant,
 10
 11 vs. Civil Action No. 64 C 1878
 12 The Honorable Amy J. St. Eve
 13 NATIONAL SPIRITUAL ASSEMBLY OF
 14 THE BAHAI'S OF THE UNITED STATES
 15 OF AMERICA, INC.,
 16
 17 Counterclaimant.
 18
 19 AFFIDAVIT
 20
 21 Deposition of: JAMES A. MEYER
 22
 23 Date taken: April 18, 2007
 24
 25 The witness in this case was notified of the
 need for signature on _____.
 Failure of the witness to timely sign this
 deposition has resulted in the filing of this
 deposition on _____.
 _____ BEAN & ASSOCIATES, INC.
 (3622A) JAW

Page 35

1 DATE DELIVERED: _____
 2 MR. JEFFREY A. GOLDBERG
 3 P.O. Box 254
 4 Albuquerque, New Mexico 87103-0254
 5 RE: NSA (Hereditary) vs. NSA
 6 DEPOSITION OF: JAMES A. MEYER
 7 DATE TAKEN: April 18, 2007
 8 Dear MR. JEFFREY A. GOLDBERG:
 9 At the time of the above deposition/sworn statement,
 10 it was requested that the witness read and sign
 11 his/her transcript.
 12 _____ Enclosed is your copy of the transcript with the
 13 original signature page. Please ask the witness to
 14 read the transcript, make any corrections on the
 15 signature page, and return the original signature page
 16 to our Albuquerque office.
 17 _____ Enclosed is your copy of the transcript. Please
 18 read it, note any corrections on the signature
 19 page, and return the original signature page to
 20 our Albuquerque office. You may keep the
 21 transcript for your files.
 22 _____ The transcript is now ready to review. Please
 23 contact our Albuquerque office, 505-843-9494, to
 24 make arrangements to have the transcript read and
 25 signed. If you live outside the Albuquerque area,
 please call 1-800-669-9492.
 _____ The transcript is now ready for review. Please
 remit payment in the amount of \$_____ to our
 Albuquerque office. As soon as payment is received,
 your transcript will be delivered. If you choose not
 to pay, please contact our Albuquerque office,
 505-843-9494, to make arrangements for signature.
 _____ Trial in this matter is set for _____. If
 the transcript has not been read and signed before
 that date, the original will be filed without a
 signature.

Page 36

1 _____ Other: _____
 2 _____
 3 The Federal Rules of Civil Procedure provide the
 4 witness 30 days in most instances from the receipt of
 5 this letter to read and sign his/her transcript. If
 6 he/she has not read and signed the transcript in that
 7 time, we will file the original transcript without the
 8 signature page.
 9 Sincerely,
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 20 BEAN & ASSOCIATES, INC.
 21
 22
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 24
 25 (3622A) JAW

Page 37

1 RECEIPT
 2 DATE: April 18, 2007
 3 JOB NUMBER: (3622A) JAW
 4 WITNESS NAME: JAMES A. MEYER
 5 CASE CAPTION: NSA (Hereditary) vs. NSA
 6 *****
 7 ATTORNEY: MR. CHRISTOPHER M. DOLAN
 8 DOCUMENT: Transcript / Exhibits / Disks / Other _____
 9 DATE DELIVERED: _____ DEL'D BY: _____
 10 REC'D BY: _____ TIME: _____
 11 *****
 12 ATTORNEY: MR. JEFFREY A. GOLDBERG
 13 DOCUMENT: Transcript / Exhibits / Disks / Other _____
 14 DATE DELIVERED: _____ DEL'D BY: _____
 15 REC'D BY: _____ TIME: _____
 16 *****
 17 ATTORNEY:
 18 DOCUMENT: Transcript / Exhibits / Disks / Other _____
 19 DATE DELIVERED: _____ DEL'D BY: _____
 20 REC'D BY: _____ TIME: _____
 21 *****
 22 ATTORNEY:
 23 DOCUMENT: Transcript / Exhibits / Disks / Other _____
 24 DATE DELIVERED: _____ DEL'D BY: _____
 25 REC'D BY: _____ TIME: _____

10 (Pages 34 to 37)

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