2

4 5

6

7

8

9

11

12 13

14

15

16

17 18

19

20

21 22

23

24

25

26

Certified to be true and correct copy of original filed in my office, Dated 3/6/86

Robert M. Christ, Clerk

Deputy Octogal

DEC 20 9 53 44 185

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA

٧.

MA ANAND SHEELA, aka Sheela Patel, aka Sheela Birnstiel;

MA ANAND PUJA, aka Dianne Onang;

MA ANAND SU, aka Susan Lissanevitch, aka Susan Strock;

SWAMI ANAND JULIAN, aka Julian James;

MA YOGA VIDYA, aka Ann Phyllis McCarthy;

SWAMI ANUGITEN, aka Richard Kevin Langford;

MA DHYAN YOGINI, aka Alma Angelina Potter;

SWAMI VEET SANDEHA, aka James Grant Henningham;

MA ANANO JAGRUTI, aka Bonnie May Barlow;

No. CR 85-278

INDICTMENT

[18 U.S.C. §§ 371; 2511(1)(a)&(b); and 2]

1 MA PREM SAVITA, aka Sally Ann Croft; 2 MA DEVA KRANTO, 3 aka Gail Ellen Murphy; 4 MA PREM GEETA. aka Mary Ann Price; 5 ·MA DEVA RIKTA, 6 aka Phyllis Caldwell; MA PREM PATIPADA, · 7 aka Mary Anne Young; MA JIVAN KAVIA. 9 aka Evag Norback Wells; 10 SWAMI PREM RAJAN, aka Gerald James Dunsford; 11 SWAMI ANUBAVO. 12 aka Jorg Dauscher; 13 SWAMI ANAND MICHEL, aka Michael Bisson; 14 MA PREM SAMADHI, 15 aka Carol Matthews, 16 SWAMI DHYAN DIPO, aka Urs Birnstiel; and 17 SWAMI DEVA KUTEER, aka Carlo Zansi, 18 Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

1. Beginning on or about January 1984, the exact date unknown and continuing to September 15, 1985, at Rajneeshpuram, Wasco County, in the District of Oregon MA ANAND SHEELA, also known as Sheela Patel, also known as Sheela Birnstiel; MA ANAND PUJA, also known as Dianne Onang; MA ANAND SU, also known as Susan Lissanevitch, also known as Susan Strock; SWAMI ANAND

PAGE 2 - INDICTMENT

19

20

21

22

23

24

25

26

JULIAN, also known as Julian James; MA YOGA VIDYA, also known as Ann Phyllis McCarthy; SWAMI ANUGITEN, also known as Richard Kevin Langford; MA DHYAN YOGINI, also known as Alma Angelina Potter; SWAMI VEET SANDEHA, also known as James Grant Henningham; MA ANAND JAGRUTI, also known as Bonnie May Barlow; MA DEVA KRANTO, also known as Gail Ellen Murphy; MA PREM GEETA, also known as Mary Ann Price; MA DEVA RIKTA, also known as Phyllis Caldwell; MA PREM PATIPADA, also known as Mary Anne Young; MA JIVAN KAVIA, also known as Evag Norback Wells; SWAMI PREM RAJAN, also known as Gerald James Dunsford: SWAMI ANUBAYO, also known as Jorg Dauscher; SWAMI ANAND MICHEL, also known as Michael Bisson; MA PREM SAMADHI, also known as Carol Matthews; and MA PREM SAVITA, also known as Sally Ann Croft, defendants herein, and Swami Krishna Deva, also known as David Knapp; Ma Ava, also known as Ava Kay Avalos; Ma Anand Sagun, also known as Dianne N. Langhoff; Swami Prem Rajesh, also known as Alan Thomas Gay; Ma Prem Kavido, also known as Cathy Knapp; and Ma Anand Kamala, also known as Lorie Sargent, did unlawfully, willfully and knowingly conspire, combine, confederate and agree with each other to intercept and endeavor to intercept wire communications made to and sent from the City of Rajneeshpuram, Oregon by mechanical listening devices located near the central telephone communication center at the Socrates Building, Rajneeshpuram, Wasco County, Oregon, in violation of Title 18, United States Code, Section 2511(1)(a).

2. It was part of the conspiracy that the defendants established and maintained a listening post at the Old Xerox Room in the Socrates Building which was capable of secretly intercepting and recording all incoming and outgoing telephone calls at Rajneeshpuram.

| //

22

23

24

25

26

PAGE 3 - INDICTMENT

//

- 3. It was part of the conspiracy that Ma Anand Kamala, also known as Lorie Sargent, and others established and maintained a rotating schedule to secretly monitor telephone calls and then methodically destroy the written schedule by shredding the schedule in a paper shredding machine.
- 4. It was part of the conspiracy to screen and save illegally intercepted conversations for intelligence and other purposes by recording and preserving wire communications on cassette tape recording machines.
- 5. It was part of the conspiracy for the defendants to secretly attempt and to secretly obtain information from wire communications which they believed was adverse to the perceived interests of the commune known as Rajneeshpuram.
- 6. In furtherance of the conspiracy in an effort to effect the objects thereof the said defendants did commit among others the following:

OVERT ACTS

- 1. Beginning in about January 1984 Swami Prem Rajesh, also known as Alan Thomas Gay, and SWAMI ANAND MICHEL, also known as Michael Bisson, installed and maintained tape recorders and other electronic and mechanical devices in the Old Xerox Room, Socrates Building, Rajneeshpuram, Oregon, which were capable of secretly intercepting and recording telephone calls to and from six (6) public pay telephones and other telephone calls to and from Rajneeshpuram, Oregon.
- 2. On May 1, 1985, a wire communiation between Sergeant Harold Wadkins, Wasco County Sheriffs Office and Deputy James Webb, Wasco County Sheriffs Office, was intercepted and recorded without the consent of either party to the communication.

PAGE 4 - INDICTMENT

- 3. On about November 30, 1984, a wire communication between Karen Kelm, Wasco County Sheriffs Office, and Deputy James Webb, Wasco County Sheriffs Office, was intercepted and recorded without the consent of either party to the communication.
- 4. On about July 7, 1985, a wire communication between Beverly Listebarger and Swami Prem Sarmad, also known as Doug F. Dent, was intercepted and recorded without the consent of either party to the communication.
- 5. On about October 20, 1984, a wire communication between Sheriff Robert G. Brown, Wasco County, Oregon, and Ma Prem Sono, also known as Fransetta Michetti, was intercepted and recorded without the consent of either party to the communication.
- 6. On about October 20, 1984, a wire communication between Captain Elmer D. Noland, Oregon State Police, and Ma Prem Sono, also known as Fransetta Michetti, was intercepted and recorded without the consent of either party to the communication.
- 7. On July 3, 1985, a wire communication between Michael Sullivan and Dr. Philip Eichling was intercepted and recorded without the consent of either party to the communication.
- 8. On about September 10, 1984, a wire communication between Jack Bryant and Jerry Henriksen was intercepted and recorded without the consent of either party to the communication.
- 9. On about February 28, 1985, a wire communication between Don Irwin and Jody Cochenour was intercepted and recorded without the consent of either party to the communication.

// 🥞

//

10. On about May 22, 1985, a wire communication between Don Irwin and Jody Cochenour was intercepted and recorded without the consent of either party to the communication.

- 11. On about April 29, 1985, a wire communication between Theodore Howard Darling and Ma Deva Samarpita was intercepted and recorded without the consent of either party to the communication.
- 12. On about April 3, 1985, a wire communication between Theodosios Sakis Vlahopoulos and Swami Dhyan Anutoshen was intercepted and recorded without the consent of either party to the communication.
- 13. On about July 8, 1984, a wire communication between Dr. Philip Eichling and Dr. Robert Boone was intercepted and recorded without the consent of either party to the communication.
- 14. On about October 21, 1984, a wire communication between Dr. Philip Eichling and Mr. Henry Horton was intercepted and recorded without the consent of either party to the communication.
- 15. On about September 23, 1984, a wire communication between Scott Miller and Rob McMichaels was intercepted and recorded without the consent of either party to the communication.
- 16. On about March 29, 1985, a wire communication between James Goddard, Lloyd Thomas, Vern Duncan and Ronald Burge was intercepted and recorded without the consent of the parties to the communication.
- 17. On about August 28, 1985, a wire communication between Stanley G. Renecker and Diana Ziegler was intercepted and recorded without the consent of either party to the communication; all in violation of Title 18, United States Code, Section 371.

PAGE 6 - INDICTMENT

//

COUNT TWO

- 1. Beginning on or about November 1983, the exact date unknown and continuing to September 15, 1985, at Rajneeshpuram, Wasco County, in the District of Oregon MA ANAND SHEELA, also known as Sheela Patel, also known as Sheela Birnstiel; MA YOGA VIDYA, also known as Ann Phyllis McCarthy; MA ANAND SU, also known as Susan Lissanevitch, also known as Susan Strock; SWAMI ANAND JULIAN, also known as Julian James; MA PREM SAMADHI, also known as Carol Matthews; and SWAMI ANAND MICHEL, also known as Michael Bisson, defendants herein, and Swami Prem Rajesh, also known as Alan Thomas Gay, did unlawfully, willfully and knowingly conspire, combine and agree with each other to intercept and endeavor to intercept oral communications made within the residential complex known as Alan Watts, Rajneeshpuram, Oregon, by mechanical and electronic listening devices capable of transmitting signals by wire hidden within the buildings; in violation of Title 18, United States Code, Section 2511(1)(b).
- 2. In furtherance of the conspiracy and in an effort to effect the objects thereof the defendants did commit among others the following:

OVERT ACTS

- 1. Beginning on about November 1983 Swami Prem Rajesh, also known as Alan Thomas Gay, installed hidden microphones in a building designated A-4, Rooms (1)(2)(3)&(4), in the Alan Watts living area, Rajneeshpuram, Oregon.
- 2. On about November 1983 Swami Prem Rajesh, also known as Alan Thomas Gay, established a listening post in Building A-3, Room 3, Alan Watts, Rajneeshpuram, Oregon, where oral communications signals from Building A-4, Rooms (1)(2)(3)&(4), were transmitted by wire, and recorded by tape recording equipment.

PAGE 7 - INDICTMENT

3. That on or about September 27, 1984, an oral communication between James Long and Leslie L. Zaitz was intercepted without the consent or knowledge of either party to the communication; all in violation of Title 18, United States Code, Section 371.

COUNT THREE

- 1. Beginning on or about March 1984, the exact date unknown, and continuing to September 15, 1985, at Rajneeshpuram, Wasco County in the District of Oregon SWAMI ANAND JULIAN, also known as Julian James; SWAMI ANAND MICHEL, also known as Michael Bisson; MA ANAND SU, also known as Susan Lissanevitch, also known as Susan Strock; MA DEVA KRANTO, also knowns as Gail Ellen Murphy; and MA YOGA VIDYA, also known as Ann Phyllis McCarthy, defendants herein and Swami Prem Rajesh, also known as Alan Thomas Gay, did unlawfully, willfully and knowingly conspire, combine and agree with each other to intercept oral communications made within the Hotel Rajneesh located at Rajneeshpuram, Oregon, by mechanical and electronic devices capable of transmitting signals by wire hidden within the Tarot and Rajneesh wings of the hotel in violation of Title 18, United States Code, Section 2511(1)(b).
- 2. In furtherance of the conspiracy and in an effort to effect the objects thereof the defendants did commit among others the following:

OVERT ACTS

- 1. On about March 1984 Swami Prem Rajesh, also known as Alan Thomas Gay and SWAMI ANAND MICHEL, also known as Michael Bisson, installed hidden microphones capable of transmitting signals by wire in Rooms 38, 39, 40 and Suite 2 of the Tarot Wing, Hotel Rajneesh, Rajneeshpuram, Oregon.
- 2. On about April 1985 Swami Prem Rajesh, also known as Alan Thomas Gay, installed mechanical and electronic devices capable of transmitting

PAGE 8 - INDICTMENT

signals by wire in Rooms 9, 10, 12, 14, 15, 16, 33, 34, 35, 37, 38, 39, 40, 45, 46, 48, 49, 50, 51, 52 and Suites 1 and 2 of the Rajneesh Wing, Hotel Rajneesh, Rajneeshpuram, Oregon.

- 3. On about March 1984 Swami Prem Rajesh, also known as Alan Thomas Gay, created a listening post in Rooms 7 and 8 of the Tarot Wing of the Hotel Rajneesh, Rajneeshpuram, Oregon, where oral communications could be secretly overheard.
- 4. On about July 11, 1984, an oral communication between Neil Wilburn and Jenny Pietka was intercepted without the consent of either party to the communication; all in violation of Title 18, United States Code, Section 371.

COUNT FOUR

1. Beginning on or about April 1985, the exact date unknown, and continuing to September 15, 1985, at Rajneeshpuram, Wasco County, in the District of Oregon MA ANAND SHEELA, also known as Sheela Patel, also known as Sheela Birnstiel; SWAMI ANAND JULIAN, also known as Julian James; SWAMI ANAND MICHEL, also known as Michael Bisson; SWAMI ANUBAVO, also known as Jorg Dauscher; SWAMI DHYAN DIPO, also known as Urs Birnstiel; MA ANAND PUJA, also known as Dianne Onang; SWAMI PREM RAJAN, also known as Gerald James Dunsford; MA PREM SAMADHI, also known as Carol Matthews; MA DHYAN YOGINI, also known as Alma Angelina Potter; SWAMI DEVA KUTEER, also known as Carlo Zanasi; MA YOGA VIDYA, also known as Ann Phyllis McCarthy; MA PREM SAVITA, also known as Sally Ann Croft; and MA ANAND SU, also known as Susan Lissanevitch, also known as Susan Strock, defendants herein, and Swami Prem Rajesh, also known as Alan Thomas Gay; Swami Krishna Deva, also known as David Knapp; and Ma Ava, also known as Ava Kay Avalos, did unlawfully, willfully and knowingly

PAGE 9 - INDICTMENT

conspire, combine and agree with each other to intercept oral communications made within the residential complex known as Mohammed Grove, Rajneeshpuram, Oregon, by mechanical and electronic devices capable of transmitting signals by wire hidden within the walls of residences at Mohammed Grove; in violation of Title 18, United States Code, Section 2511(1)(b).

2. In furtherance of the conspiracy and in an effort to effect the objects thereof the defendants did commit among others the following:

OVERT ACTS

- 1. On about April 1985 SWAMI ANAND MICHEL, also known as Michael Bisson, installed mechanical and electronic devices capable of transmitting signals by wire in the residences designated Mohammed Grove I and II.
- 2. On about April 1985 SWAMI ANAND JULIAN, also known as Julian James, established a listening post at Jesus Grove, Rajneeshpuram, where oral communications from Mohammed Grove could be secrectly overheard; all in violation of Title 18, United States Code, Section 371.

COUNT FIVE

On about July 1984, the exact date unknown, at Rajneeshpuram, Wasco County, in the District of Oregon, MA ANAND SHEELA, also known as Sheela Patel, also known as Sheela Birnstiel; MA DEVA RIKTA, also known as Phyllis Caldwell; SWAMI ANAND JULIAN, also known as Julian James; and SWAMI ANAND MICHEL, also known as Michael Bisson, defendants herein, did unlawfully, willfully and knowingly endeavor to intercept oral communications at a restaurant known as Zorba the Buddha, located at Rajneeshpuram, Oregon, by installing electronic devices capable of transmitting communications by radio which devices were hidden in the legs of a round dining table located in said

PAGE 10 - INDICTMENT

restaurant whose operation affected interstate commerce in violation of Title 18, United States Code, Sections 2511(1)(b) and 2.

DATED this //day of December, 1985.

A TRUE BILL.

FORPERSON

CHARLES H. TURNER United States Attorney District of Oregon

BARON C. SHELDAHL

Assistant United States Attorney

DELO, KANTOR & STAMM

ATTORNEYS AT LAW

Suite 1437 900 S.W. Fifth Avenue Portland, Oregon 97204-1223

DONNA S. DELO LEW E. DELO HENRY KANTOR DOUGLAS A. STAMM

AREA CODE 503 TELEPHONE 228-3299

MICHAEL P. LONG *

* Also Member of California Bar

March 7, 1986

Mr. Ronald M. Hoevet Hoevet & Snyder, P.C. Suite 1400 900 S.W. Fifth Avenue Portland, Oregon 97204

Ransom, Blackman & Simson Suite 900 621 S.W. Morrison Street Portland, Oregon 97205

Mr. John H. Hingson, III 222 Promenade Building 421 High Street Oregon City, Oregon 97045

Mr. Robert J. McCrea McCrea & McCrea 1147 High Street Eugene, Oregon 97401

Mr. John S. Ransom

RE: Rajneesh Financial Services Trust Wiretapping Indictment Our File No. 86-270-11-1

Gentlemen:

Enclosed please find a copy of a certified copy of the wiretapping indictment issued by the Federal Grand Jury on December 19, 1985.

Very truly yours,

Henry Kantor

HK/mel Enclosure

RECEIVED
MAR 1 1 1986

ransom, blackman & Simson