

## FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 11/15/85

DAVID BERRY KNAPP, also known as Swami Krishna Deva and K. D., appeared at the Portland Office of the Federal Bureau of Investigation (FBI). KNAPP was interviewed periodically between October 29, 1985 and November 7, 1985. Present at the interviews were JOHN J. FEHER, Criminal Investigator, Immigration and Naturalization Service (INS), BOB GREENE, Investigator, Oregon Department of Justice, and MARLEN HEIN, Senior Trooper, Oregon State Police (OSP). KNAPP was accompanied by his attorney, Mr. DES CONNALL. KNAPP was aware that he was being interviewed pursuant to a guilty plea agreement between him and the office of the United States Attorney, Portland, Oregon. KNAPP was informed that he would be interviewed concerning his knowledge of criminal activity which took place at Rajneeshpuram, Oregon, and other criminal activity which members of the Rajneesh Commune had allegedly committed.

KNAPP furnished the following information regarding his relationship with RAJNEESH:

DAVID BERRY KNAPP resided with his parents in Chicago, Illinois, until he reached age 4. At that time he moved with his family to Highland Park, Illinois. KNAPP graduated from Highland Park High School in 1967. KNAPP then went to college at the University of Southern California at Los Angeles, California. KNAPP resided during his college days at the University Dormitory, the Phi Kappa Alpha Fraternity House and various apartment buildings. After graduating from USC in 1971, KNAPP worked for his parents distributing records and tape recordings.

KNAPP began a Masters program in 1972 at USC in Counseling and held various part time jobs.

KNAPP informed that he ran a home for emotionally disturbed individuals in Los Angeles from 1972 to 1974 and started a boys home which he referred to as "The Family Home." He was involved in the running of this home from 1974 until 1977.

KNAPP attended Lone Mountain College, which he described as an affiliated institution of the University of San Francisco. He obtained a Masters Degree in Counseling from this college. KNAPP advised that at that time he received a license in marriage, family and child counseling.

KNAPP had previously worked as a drug and alcohol counselor. He was a counselor at Santa Monica College in 1977 and 1978. He also started a marriage counseling practice in Southern California in 1976. He also

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by SA RONALD E. KNIGHT  
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took and passed his real estate broker's license examination in 1977. KNAPP informed that he was counseling cancer patients in 1977 and 1978.

KNAPP first was introduced to the teachings of BHAGWAN SHREE RAJNEESH by reading a book which had been loaned to him by a psychologist friend, whom he identified as BRUCE DURMAN. KNAPP said that this occurred in 1976. KNAPP informed that after reading this book, he began listening to tape recordings of BHAGWAN. KNAPP said that the philosophy of BHAGWAN intrigued him since it was a philosophy of no guilt and freedom of choice. He also was interested in their counseling and group therapy sessions which he had heard were practiced in the Ashram at Poona, India.

In July, 1978, KNAPP traveled to Poona, India, with his sister and a girlfriend and male friend.

KNAPP said that he took Sannyas from BHAGWAN in Poona, India, in 1978. KNAPP eventually returned to the United States on September 18, 1978, and returned again to India in December, 1978. KNAPP said he returned to the United States again in May, 1979 and returned to India in July, 1979. KNAPP remained in India at the Ashram at Poona until July 20, 1981, when he returned to the United States as a full fledged Rajneesh member and traveled to Montclair, New Jersey, where the Chidvillas Rajneesh Meditation Center was located at a mansion known as the Castle.

Shortly after he arrived at the Castle he was invited to Ville De Rajneesh, which later became known as Rancho Rajneesh and Rajneeshpuram. KNAPP informed that the reason he was invited to be one of the first persons to Ville De Rajneesh was because of his real estate background and of the fact that he was knowledgeable concerning incorporation and municipality law. His job was going to be to resolve zoning difficulties with surrounding ranchers in Oregon as well as the townspeople and other government agencies.

At that time, the ranch known as Ville De Rajneesh was also known as the Chidvillas Meditation Center which later became the Rajneesh Foundation International and is now known as Rajneesh Friends International. KNAPP said he had to deal with various land owners on house purchases and it was he who came up with the idea of making Rajneeshpuram an incorporated city. KNAPP said he became a city official in August, 1982.

When KNAPP became a city official, he said he stopped doing the zoning duties and became a spokesperson for the city.

KNAPP informed that in August, 1981, SHEELA asked for his help to get two children into the United States from India. He said the children's mother was MA ARUNA BARHTI. SHEELA requested that KNAPP marry ARUNA in order to bring her and her children to the United States. KNAPP agreed to do this and ARUNA and he became engaged. KNAPP recalled requesting INS permission for the mother and the two children to travel to the United States. KNAPP informed that in December, 1982, he married ARUNA. He said he lived in the same house with ARUNA but eventually moved out to Jesus Grove. KNAPP said the marriage was never consummated and the marriage was a sham.

KNAPP informed that he had a great deal of information pertaining to violations of United States Immigration Law. JOHN J. FEHER, Criminal Investigator, INS, conducted the interview concerning KNAPP's knowledge pertaining to immigration violations by BHAGWAN SHREE RAJNEESH and other members of the commune.

The results of this interview are summarized as follows:

KNAPP informed that MOSES at Poona, India, handled the passport and visa matters while KNAPP was in India. KNAPP said that during the time he was at Poona, he had a girlfriend by the name of MA DEVA ANANDO, also known as SUE APPLETON, who was an Australian National. APPLETON departed Poona on approximately May 18, 1980. KNAPP said that this was prior to the time when BHAGWAN departed Poona. At the time his girlfriend left it was his opinion that she was intending to travel to the United States. He also said that when BHAGWAN left it was his opinion that he was traveling to the United States. He based this opinion upon a rumor and the fact that his sister was a mail coordinator at the time and seemed to have a sense where the commune was planning to relocate. KNAPP said the exact location where the commune was to relocate was kept secret.

During the time KNAPP was in Poona, there were discussion pertaining to marriages, and at one time there was a meeting attended by twenty or thirty people who consisted of citizens of the United States. There was a discussion concerning the marriage of Indian citizens to American citizens. Additionally, according to KNAPP, there had been prior discussions of marriage of citizens of Great Britain to citizens of other countries so that permanent residence in India could be established.

During this time, KNAPP stated that VIDYA, approached him regarding his marrying a citizen of India. He said that this was a person which SHEELA requested that he marry so that her children could be brought to the United States.

KNAPP furnished details concerning his knowledge of the death of SHEELA's first husband, MARC SILVERMAN, also known as SWAMI CHINMAYA. According to KNAPP, SHEELA told him during a trip to India which they took in 1985, that she had injected her first husband with an injection which caused his death. SILVERMAN was allegedly dying of cancer or Hodgkins Disease and, according to SHEELA, also had herpes sores. SHEELA said that PUJA furnished her with the instrument which she used to inject SILVERMAN, and after the injection, he died. This occurred somewhere between June 11 and 12, 1980, at the Krishna House where SILVERMAN and SHEELA resided. KNAPP said that he learned from SHEELA that there was a partition in the room where SHEELA could have her privacy in order to entertain her lover.

KNAPP further informed that he recalled that SHEELA had discussed this plan of the "mercy killing" of her husband with BHAGWAN and that he had referred to SILVERMAN in one of his discourses just prior to SILVERMAN's death.

KNAPP further said that SHEELA's lover during the time of her husband's illness was SWAMI VEETRAGA, who is know KNAPP's sister's lover.

KNAPP related information concerning his travel from Poona, India, to the United States. KNAPP said while he was in the United States he was invited to go to the Chidvillas Rajneesh Meditation Center (CRMC) located in Oregon. He said SHEELA invited him there due to the fact that SHEELA invited him there due to the fact that SHEELA knew he had ability with the land use and zoning laws. He arrived at CRMC on July 24, 1981, and subsequently signed a document dated July 25, 1981, pertaining to the CRMC and the unincorporated commune.

KNAPP said that SHEELA and BHAGWAN had a close relationship. He described the relationship as one where SHEELA saw RAJNEESH every evening. KNAPP said that the relationship was such that everything SHEELA said came from BHAGWAN. Whenever SHEELA spoke, it was accepted by everyone that she spoke on behalf of BHAGWAN. KNAPP informed that he was personally aware of instances when SHEELA went to see RAJNEESH with one idea and returned, after conversing with BHAGWAN, with a different idea and that was the idea which would be adopted.

KNAPP said that he believed that BHAGWAN was aware of everything which occurred at Rajneeshpuram with the possible exception of the conspiracy to kill his personal physician, DEVARAJ, and the bugging of his personal room at Lao Tzu.

KNAPP characterized his duties, during the early days at the ranch, as researching zoning ordinances, preparing maps, and conversing with officials in Wasco County. KNAPP also said he had the responsibility for looking for a place for BHAGWAN to reside. He said that from the beginning, SHEELA had a desire to circumvent all local laws; however, KNAPP advised that he researched the law and was able to obtain permits quite quickly. KNAPP said that the plan for the entire commune to move to the ranch was known by KNAPP from the very beginning, shortly after he arrived in Oregon.

KNAPP related certain details pertaining to instruction received by foreign nationals who resided at the commune as to what they should do in the event of an INS raid. KNAPP informed that on one occasion, SHEELA pretended to have contacts at the INS. She pretended that she had foreknowledge of an expected raid by the INS. SHEELA disliked BHAGWAN's family members and used this phony information to convince them that they should depart Rancho Rajneesh and return to India, since they would be deported if they were arrested as a result of the expected raid. SHEELA had BHAGWAN's family removed in vans from the ranch and they traveled to San Francisco where they left the United States and returned to India.

KNAPP advised that the security would also be handled by the Rajneesh Security Force at Rancho Rajneesh and then eventually Rajneeshpuram. Whenever there was a situation which would be perceived as an emergency such as a raid by the INS, a code word would be broadcast which, for a time, was "Mukta's Laundry." When this code word would broadcast, beepers would go off and the key security people would then respond to a contingency plan. A portion of this plan was to move BHAGWAN to another location on the ranch. One of the locations was the room which had been prepared under SHEELA's residence at Jesus Grove or a townhouse which was maintained at an undisclosed location on the ranch. Foreigners with visa problems would be moved to remote locations at the ranch. KNAPP also said that if the airport was to be used for aircraft landing as part of the raiding force, Rajneesh aircraft would take off and fly in layered levels over the airport to prevent hostile aircraft from landing.

KNAPP also said there was a plan that if a helicopter attempted to land at the house where BHAGWAN resided, Lao Tzu, the guard shack had a loudspeaker system to warn the helicopter to turn away. If the helicopter refused to do so, then the plan was to shoot at the helicopter with a .308 caliber rifle loaded with armor piercing bullets. It was noted that the person who would make this decision would have been the person at the guard shack since each security officer was entitled to make an emergency decision on their own.

KNAPP said that he was one of the first persons assigned to the security force, which consisted of a group of 38 people. This began to be known as the "38". KNAPP described this as a secret group, which eventually grew to be approximately 100 persons. These individuals KNAPP characterized as trusted by SHEELA who were entrusted to guard BHAGWAN's life.

KNAPP informed that in early 1984, more weapons began to be used by the security force. KNAPP said that the security force began to acquire more Uzi and Galil rifles and .308 caliber rifles. KNAPP also said they acquired .223 caliber rifles. KNAPP said all security force persons have been trained to use the weapons and that the training has been intense. KNAPP said that it is his opinion that the people who have access to the weapons are proficient with their use.

KNAPP informed that he also believes that the security force people will respond with deadly force in the event that the life of BHAGWAN is threatened.

KNAPP furnished information concerning two plans. One designated as "Plan A" was a plan which was formed while the commune was located at Poona, India. This plan was formulated in order to come up with ideas as to how the commune could get BHAGWAN to the United States and obtain permanent residency for him there.

"Plan B" was a situation in which SHEELA wanted to get the community free of any debt by having a group of people go and work to earn money elsewhere. Eventually BHAGWAN could join these people if he so desired.

KNAPP said that in early June, 1985, SHEELA visited BHAGWAN on a nightly basis. SHEELA had gradually become "fed up with seeing BHAGWAN." At one time, BHAGWAN told her that she should travel to India to find a place for him to live in the Himalayas.

SHEELA asked PATI PADA and KNAPP to accompany her to India. KNAPP said they traveled to India in June, 1985, where they stayed at a hotel in Delhi. KNAPP said that during that time there was civil unrest due to the situation involving the Sikhs. SHEELA constantly exaggerated the trouble during telephone conversations from India to Rajneeshpuram. After approximately three days, BHAGWAN told them to return to the United States due to the danger in India.

After this trip to India, SHEELA became very negative about residing at Rajneeshpuram. She took numerous drugs which were mainly valium and other tranquilizers. KNAPP also said that she was taking intravenous fluids but he did not know what they contained. KNAPP related an incident regarding the preparation of fictitious adoption papers, which occurred when SU traveled to India in December or January, 1984. SU returned from India with the document, which was apparently an old document which purported to be an adoption document in which SHEELA's father, BAPUJI, wrote the document which said that he adopted BHAGWAN SHREE RAJNEESH. Someone forged BHAGWAN's father's signature on the document. KNAPP said that SU told him that while she was in India she took special pains to search for old paper and ink. She researched documents on file and, according to KNAPP, the document she had looked old and authentic.

After SU brought the document to the United States in January, 1984, KNAPP had the responsibility of attempting to authenticate it. KNAPP made telephone calls to handwriting experts, paper analysts and ink examiners. KNAPP obtained the names of experts and eventually went to the East Coast with SHEELA with the document.

KNAPP said that he and SHEELA presented the document to RABINCHANDRA PATEL, New York City, telephone number 212/966-6262. PATEL translated the document and said in his legal opinion, the document was an authentic adoption document in India.

KNAPP said that he and SHEELA subsequently found someone to examine the ink and paper. KNAPP said this individual stated that the examination revealed that the document was old, however, this person did determine that there was one flaw in the document. KNAPP said that the examiner pointed out that the paper had a fold down the middle and that there was a slight tear in the fold. The document examiner noted that his examination revealed that the document would have to have been written after the fold and tear was in the paper, due to the way the ink had seeped through the tear. The document examiner informed that this made him suspicious that the document was inauthentic. In his opinion, documents are usually written on unfolded paper and for this reason he questioned that documents' authenticity.

KNAPP said that BHAGWAN was aware of the plan to use this adoption document and was totally supportive of this plan.

The document was eventually presented to the INS to show that BHAGWAN was actually the adopted son of an American Citizen. However, the petition was later withdrawn due to the fact that the INS demanded the original document and SHEELA refused to make it available.

KNAPP informed that sometime after the Summer Festival in approximately August, 1984, he was out of town. KNAPP believed that at the time he was in Salem conducting city business.

KNAPP remembered that when he returned to Rajneeshpuram, within a short time after he returned, he heard from someone that something had happened at Zorba the Buddha Restaurant at the City of Rajneesh. KNAPP was told that Judge WILLIAM HULSE had been given a drink and afterwards became ill. KNAPP believed that the person who he was told gave HULSE this drink was either PUJA or AVA.

KNAPP advised that he could not recall who the person was who told him this. However, he believed it would have been SHEELA, VIDYA or SU.

KNAPP added that on approximately the first or second week of October, he spoke to ISABEL at Hotel Rajneesh in Portland. At that time, ISABEL had been subpoenaed by the government. ISABEL told him that she believed the subpoena was pertaining to her knowledge of possible poisoning of Wasco County Officials. She related that she was at Mirdad at Rajneeshpuram with SUNSHINE or ROSALEE and that at the time PUJA asked them whether or not they had given the gentlemen a drink of water. ISABEL said that she was surprised that that PUJA offered this courtesy to these gentlemen because they were Wasco County Officials and usually it was their custom to not be courteous to visiting Wasco County Officials.

ISABEL told KNAPP that she observed PUJA offering these people a drink of water. ISABEL said that RAY MATTHEW and VIRGIL ELLET drank the water. ISABEL noted that MATTHEW became ill; however, ELLET apparently did not get sick. KNAPP noted that the feeling in the community at the time was favorable toward ELLET but unfavorable toward HULSE and MATTHEW.

KNAPP informed that in December, 1984, he was part of a group of people who flew to Canada in order to sneak an individual into the United States. He identified the individual as KIRTI and said his Sannyasin name was SURAJO. KNAPP informed that he, and others, flew to a city in Canada and then flew KIRTI to Sand Point, Idaho, where they dropped him off. He and the rest flew to Seattle and went through Customs there. Afterward they met up with the people they dropped off and returned to the ranch.

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KNAPP informed that during April or May, 1985, AVA had an apartment located at Portland, Oregon, so she would not constantly be coming in and out of the Hotel Rajneesh, where she usually stayed when she was on missions in Portland. KNAPP said he was asked by either SHEELA or AVA to find out where LES ZEITZ, Portland Oregonian Reporter, had his office at the Oregonian Building in Portland. KNAPP asked ISABEL how he would go about getting a tour of the Oregonian Building. KNAPP said that later he did get a tour of the building from LARRY HILDEBRAND and that he did, in fact, determine the location of LES ZEITZ's working area.

KNAPP met AVA and told her where ZEITZ's working area was located. KNAPP believed they had conversations when AVA was taking KNAPP to the airport so that KNAPP could return to the ranch. KNAPP was aware AVA was trying to get the article that ZEITZ was preparing for the Oregonian, concerning Rajneeshpuram, out of his files or destroy the computer that contained the information. KNAPP had heard SHEELA asking JULIAN if he could erase computer tapes by either magnetizing or demagnetizing them.

ANUGITEN had suggested stealing uniforms and attempting a burglary of the Oregonian. KNAPP informed that AVA was upset about being away from the ranch and having to do the mission at the Oregonian Building.

While AVA stayed at the apartment, SAVITA, VIDYA and SU were her contact people.

KNAPP informed that he believed that the money used for these missions came from the gambling that was run on the ranch. He based this opinion upon having heard SAVITA discussing using gambling money for that purpose.

KNAPP said that SAVITA was in charge of the trailer which was located behind Zarathustra Building at Rajneeshpuram. KNAPP informed that the purpose of this trailer was to change documents that could later cause problems with the INS or Internal Revenue Service (IRS). KNAPP said that people at the trailer were altering any document that had anything to do with SHEELA or corporations. KNAPP said he believed it was old paperwork from Chidvillas days and people would attempt to eradicate anything that would possibly cause the INS to know when foreigners entered the country. He recalled the people in the trailer putting Americans' names on all documents. KNAPP said the trailer was active from July, 1985, until September, 1985. KNAPP said that document altering also occurred in relation to SHEELA's tax problems.

KNAPP said that concerning the "Share a Home" program that the commune brought busloads of people to Rajneeshpuram. KNAPP informed that he had the role of greeting people and explaining to them the ground rules of the community. He said that he explained to these persons, brought to the commune, that criminal conduct, drugs, and other behavior not keeping with the commune's rules and

regulations would not be tolerated.

KNAPP said that so many people left soon after they arrived to Rajneeshpuram that it became clear that there was no way that there would be enough voters to win the election at Wasco County. KNAPP said that the whole purpose for the Share a Home Program was to import people to Wasco County to stack the election for the Sannyasins at Rajneeshpuram. He said it was clear by Mid-October that the idea that they would have enough people at the commune so they could swing the Wasco County election was not going to work.

KNAPP said that he and SHEELA discussed what they were going to do in order to remedy this problem. KNAPP said he drafted a press release for SHEELA to read. KNAPP said that he and SHEELA talked to BHAGWAN and he was informed of the press release. BHAGWAN looked at the press release and dictated it to KNAPP. KNAPP said that the press release was an example of what BHAGWAN wanted to get out of the settlement concerning the street people being returned to their original residences. 1) They wanted a settlement of the lawsuit in the Church/State case with the State Attorney General's Office; 2) They wanted the INS to resolve BHAGWAN's immigration status; 3) In return, they would transport and return to their homes, the street people, which they had brought there in the first place; 4) They would abandon the City of Antelope.

KNAPP said that BHAGWAN went along with this plan and he, in fact, drafted the final press release. SHEELA was the one who gave the press release and SHEELA referred to the whole thing as a joke. KNAPP informed that he took the plan at face value and attempted to negotiate with government officials concerning the return of the street people and attempted to settle the cases. However, during the middle of the negotiations, SHEELA sent a group of street people to The Dalles and abandoned them out in the neighborhoods of the town.

KNAPP characterized the whole Share a Home Program as a failure. He said nothing panned out and that when NORMA PAULUS, through her legal maneuvers, kept them away from the polls, it was actually welcomed by the commune. KNAPP said they would not have produced the numbers they claimed they would have produced and it would have been an embarrassment.

KNAPP said that during the influx of street people he remembered SHEELA and PUJA having discussions concerning something which had to be done to control the street people who were at the commune. Apparently the street people, according to KNAPP, were part of the criminal element and were difficult to keep under control. PUJA said she would come up with something. PUJA mentioned the drug Haldol and said it was used as a mild sedative to control people with mental problems.

KNAPP said that he heard that PUJA acquired Haldol and that the drug was dispensed by PUJA with the beer at Walt Whitman Grove at Rajneeshpuram. KNAPP said that VIDYA, SU, SAVITA, PUJA and SHEELA were all aware of this activity.

KNAPP informed that approximately three thousand people came through Rajneeshpuram during the Share a Home Program and approximately one thousand stayed for a short while.

KNAPP said that the reason he believes that the beer was the medium used to dispense the Haldol was because it was relayed to Sannyasins working around the Share a Home people that they should not drink the beer. KNAPP said that the beer was dispensed in kegs.

KNAPP recalled that the Oregon State Medical Examiners questioned PUJA concerning her purchase of drugs and wondered what was going on. According to KNAPP, PUJA was able to produce several bottles of Haldol, apparently purchased from another source, in order to cover up the amount of Haldol which she actually purchased.

KNAPP said that PUJA was always very excited about the disease AIDS. KNAPP said that the PUJA heard that a Sannyasin in San Francisco had AIDS, PUJA asked SHEELA to let her go down to San Francisco and draw his blood. SHEELA's answer was that it would be a good idea. KNAPP said PUJA eventually did go to San Francisco, but he is not sure that it was in connection with that conversation. KNAPP said that PUJA talked about culturing the AIDS virus and she was very secretive concerning her work in that area.

KNAPP informed that he knew that there was an individual by the name of SWAMI LAZARUS who died of AIDS and he said LAZARUS was homosexual and remembered that SAGUN was very sad when he died. KNAPP said that DURGA worked very closely with PUJA.

KNAPP informed that in August, 1985, the whole community was forced to take tests to detect the presence of the AIDS virus.

KNAPP reported that in August, 1985, BHAGWAN said, "We're going to do something big, much bigger and better than Share a Home Project." KNAPP said that he then made a suggestion that the commune take in all AIDS victims from around the country and create a place where they would be well treated. KNAPP said that his idea was later dismissed because of legal problems and due to potential health problems concerning the isolation of these AIDS victims. BHAGWAN eventually said to forget the AIDS idea.

KNAPP said that PUJA and BHAGWAN wanted luxurious surroundings for AIDS victims. KNAPP also said PUJA and DURGA ran the Desiduratha area where eleven AIDS patients were isolated. KNAPP also informed that ANUTOSH was chosen the research the legality of bringing AIDS patients from around the country to the City of Rajneesh. KNAPP remembered ANUTOSH had a dispute over the conduct of the HTLV testing with SHEELA, PUJA and SU. KNAPP said ANUTOSH had done enough research to know that the HTLV test that the ranch was conducting was not conclusive and that the eleven people that were being detained at Desiduratha were probably not really contaminated with AIDS.

KNAPP informed that in Summer, 1985, he was at the parking lot at Jesus Grove. At that time he saw JULIAN sitting in JULIAN's car which KNAPP described as one of the commune's Oldsmobiles. JULIAN said to KNAPP, "Hey, I'd like to try something with you." At that point JULIAN took out what appeared to be a speaker without a cabinet and told KNAPP to walk approximately thirty feet away from the car. At that point JULIAN turned the speaker on and pointed it toward KNAPP's head. KNAPP said he felt a tickle between his ears and became nauseous. JULIAN turned the device off.

KNAPP said later that he saw ANUBHAVO and ANUBHAVO told him that JULIAN had pointed the device at him and caused him to throw up. KNAPP said another time JULIAN was experimenting with the use of Ultrasound. KNAPP referred to this device as a pain field generator and said that this word was coined by attorney JACK RANSOM. KNAPP said the device was plugged into the cigarette lighter and it would only work if it was pointed directly at the person. KNAPP believed it worked on some time of low frequency sound wave transmission.

KNAPP informed that the employees of the city and corporations at the commune were paid salaries. However, according to KNAPP, these salaries were totally bogus. KNAPP described that the salaries were really never paid. SHEELA told him that the salaries were considered "legal payments." KNAPP knows that his salary went into a currency card account but that he was not able to use it for his own purposes. KNAPP said he could use some of the money to pay for expenses pertaining to his job (ie, licensing, etc.). KNAPP said he was paid \$650 a month or \$7,800 a year and that he probably withdrew no more than \$500 from his salary account.

KNAPP said that all persons at the commune who are paid a salary did not actually get the money but that the salary went to some type of an account and could be accessed by others who were in higher authority. He said that this money was referred to as the "funny money", which SHEELA was able to use for her activities.

KNAPP also said that there was an account opened for the gambling activities which went on at the commune. Regarding gambling, KNAPP said that SHEELA was very insistent on opening a gambling establishment at the commune. She talked to KNAPP about the legalities of it and KNAPP researched the law. In the end, SHEELA told him that she could not wait any longer and that she was going to open the gambling establishment immediately. SHEELA then travelled to Las Vegas and purchased gaming tables, chips and other gambling supplies.

When the gambling establishment opened, SHEELA and KNAPP came up with the idea that the way they could get around the law would be that the dealers would agree not to keep their winnings and that way it would be, in fact, be winnings for the house.

Sannyasins at the commune have to make reservations in order to be dealers. If anyone made a reservation to be a dealer, who was an outsider, they would be told that they had to have a minimum of \$500 cash in order to deal. They were also told that there was a five to six month waiting list to become a dealer. This would usually take care of all the outsiders who wanted to be dealers.

The agreement was that the dealers would have \$330 worth of chips when they started to play. At the end of the night the dealers would tally everything up and if they won, the winnings would go directly to their gambling currency card account. If they lost, their currency card account would be debited. However, the dealer would never have anything to do with this account and the account could be accessed by SHEELA. The gambling establishment was headed by RIKTA who was referred to as the "Main Mom."

MADUMA and ARUP were also Moms. They were in effect supervisors at the gambling casino which was called the Omar Khyam Lounge.

KNAPP said initially the gamblers would be able to get cash on their currency card account; however, this was illegal. Later they used a form, which would debit their currency card account if they lost and credit their currency card account if they won.

In effect, the gambling scheme was that the dealer was a vendor of chips. The dealer did not win anything since the winnings were credited to his or her currency card account and he or she was not allowed to access this account.

KNAPP believed that there were over thirty dealers at the Omar Khyam Lounge.

KNAPP said that the currency card account for the gambling dealers and the currency card accounts and other accounts for the "salaries" paid to employees at the commune were sources of "funny money" for SHEELA.

KNAPP informed that when the Rajneesh Commune initially relocated to Oregon, DOROTHY BROWN was the Planning Director of the Wasco County Planning and Zoning Commission, The Dalles, Oregon. KNAPP said that DAN DURROW was her assistant. KNAPP related that DOROTHY BROWN was considered very fair in her dealings with the commune but that DURROW was considered a "little old lady." KNAPP said that eventually DURROW was considered an enemy of the commune and was described as a slow and methodical person. DURROW eventually took over the zoning board and when he did he began denying the commune every request they made. KNAPP, as an example, related an incident concerning a letter that Wasco County had written to the Oregon Land Conservation Development Commission, discussing the subject of locally unwanted land use, which KNAPP referred to as a lulu letter as an example of DURROW's and the County's hostility toward the commune.

KNAPP said that when DURROW would come to the ranch, SHEELA would sometimes direct that the roads be blocked with earth moving equipment and trucks in order to impede DURROW's visit at the commune. KNAPP informed that DURROW was unwelcome at the ranch and SHEELA thought that if his visits could be disrupted it would thwart his efforts to stop the commune's land development. KNAPP characterized the feeling against DURROW as very strong animosity. SHEELA felt that any delay or distraction would affect DURROW's ability to work.

KNAPP said that when commune members, including himself, were planning the city it really did not matter where the buildings were located. He said that some buildings were built within the city limits and some were not. He informed that DURROW had accurate maps and could potentially cause a great deal of problems for the commune due to their having built some buildings outside the city limits. KNAPP cited an example of this situation as the fact that BHAGWAN's residence, Lao Tzu, was situated mostly outside the City of Rajneeshpuram but was reported to be inside the city limits. KNAPP said that there were different sets of maps at the commune, one set for the general public and one set a closely guarded secret.

KNAPP said SHEELA would issue instructions to block the road through SU, who ran the garage. SU would send people and equipment out to block DURROW as he proceeded down the county road to the commune.

DURROW came up as a potential target for harassment during a meeting that was held at Rajneeshpuram. KNAPP said that during July or August of 1984, he, ANUGITEN, PUJA, SHEELA, VIDYA and JAYANANDA travelled in a GMC Blazer which belonged to the commune to The Dalles, Oregon. At The Dalles they surveilled Wasco County buildings. KNAPP recalled that JAYANANDA drove the vehicle and SHEELA sat up front next to JAYANANDA. KNAPP said SHEELA wanted to check out various county buildings and the trip was conducted with a view toward disrupting the business of Wasco County. KNAPP described the trip as having occurred during the early morning and said that when they arrived at The Dalles they went to the Wasco County Maintenance Yard. KNAPP described this maintenance yard as being located west of DURROW's office. At the maintenance yard they observed a gas tank. Upon observing this gas tank SHEELA asked ANUGITEN, "If the tank blew up, would that set fire to DURROW's office?". KNAPP said that ANUGITEN told SHEELA that it probably would not cause damage to DURROW's office.

KNAPP remembered that they then drove behind DURROW's office to check various entry points into DURROW's office. He said they also drove to the County Annex and Courthouse.

KNAPP informed that during the ride back to the ranch, SHEELA told ANUGITEN to figure out a way to break in and burn DURROW's office down. She said he had to figure out a way to "destroy the records."

KNAPP described one meeting when VIDYA, SHANTI B, and KNAPP were instructed to conduct a surveillance at DURROW's office after a land use hearing. They used an excuse that KNAPP had to drop off some permits. While VIDYA distracted DURROW with questions about a new computer, KNAPP and SHANTI B looked around the office and, pursuant to SHEELA's instructions, looked for alarms, windows and other things pertaining to a possible break-in.

After the surveillance of DURROW's office, all the participants sat down with ANUGITEN and described its physical layout. KNAPP said a drawing was prepared but he does not recall who made it. ANUGITEN had the mission to burn DURROW's office and KNAPP knew that ANUGITEN continued to work on the project because KNAPP would occasionally hear about his progress.

KNAPP recalled a meeting where ANUGITEN said that he had purchased candles to attempt to develop a time burning fuse. KNAPP believed that ANUGITEN eventually did use candles. KNAPP said that this information came from ANUGITEN after the fire.

KNAPP informed that he was not involved in the actual arson of DURROW's office, or of the planning of the arson immediately prior to the incident. However, KNAPP did know of the preparations.

KNAPP recalled that at the time of planning there was very little concern regarding anyone thinking it was an accident and there did not seem to be any paranoia about the proposed arson.

KNAPP believed the arson was committed by ANUGITEN and possibly YOGINI and AVA. KNAPP read in the newspaper that the night before he left for Europe, which he said was January 15, 1985, the arson had occurred. KNAPP recalled that the night of January 14, 1985, he encountered SAVITA at the ranch and remembered that she was very nervous. When KNAPP asked her what was going on she said, "ANUGITEN is up in The Dalles." KNAPP believed at that time DURROW's office was probably mentioned in the conversation. He said SAVITA later received a telephone call early that morning and immediately relaxed and said, "Everything's okay." AVA later told KNAPP that she drove to The Dalles and then to California. KNAPP said he had the conversation with AVA at the Hotel Rajneesh prior to a trip to the coast. KNAPP informed that SHEELA always said she wanted to be out of town when things like DURROW's office happened. KNAPP said SAVITA got off the phone with SHEELA when SHEELA said she wished they could take care of the DURROW thing while she was gone. KNAPP said that that conversation occurred in connection with the trip that ANUGITEN was with SHEELA in Mexico. KNAPP said that he heard SAVITA's end of the telephone conversation but was made aware of what SHEELA said. KNAPP appeared puzzled by the January 15th date and said it would have been his impression that the office burned down in December or early January.

KNAPP informed that he was not spending much time travelling with SHEELA during this time since SHEELA's astrologers, whom he identified as PREM PRASAD and MA PREM TURIYA had done astrological charts which indicated that KNAPP and SHEELA were not compatible from September, 1984 until March, 1985. Since SHEELA took astrology very seriously they were not closely allied during the period of time. KNAPP said that PATI PADA would usually act as an astrological go-between pertaining to SHEELA's astrologers and SHEELA. KNAPP said that later AVA filled in for PATI PADA in this capacity.

KNAPP informed that after the fire at DURROW's office a conversation took place in early February, 1985 at SHEELA's room at Jesus Grove. Present were ANUGITEN, KNAPP, SU, SHEELA and JULIAN. KNAPP recalled that ANUGITEN told the group how they had thrown all DURROW's files into the middle of his office, doused the files with lighter fluid and used candles, which would take one hour to ignite so that they could be long gone. KNAPP also recalled hearing that the car used in the arson was sold in California and believes that SWAMI ALLEN would have been the person who would have had anything to do with cars. He said that ALLEN acted at SAVITA's direction.

KNAPP said that one plan that had been discussed, was for ANUGITEN to dress in black and would pose as a jogger in order to accomplish the arson. KNAPP also said that ANUGITEN said he would go to different stores in order to buy these supplies for the arson.

KNAPP remembered that there was talk that JAYANANDA would be the driver on a mission but he is not sure whether or not he drove in connection with the arson.

KNAPP said that the cars used for these types of missions were usually picked up in Portland at the Portland International Airport. However, he is not sure if that occurred at this time. He said that SAMADHI also had access to cars and remembers on one occasion she was driven around Portland by SWAMI ANURAG. The purpose of ANURAG driving SAMADHI around was so that she could make prank telephone calls to various officials. KNAPP further informed that SAMADHI and JAGRUTI were two other individuals who engaged in "dirty tricks." He said that SAMADHI and JAGRUTI would go to meetings of concerned Oregonians, which they referred to as "bigot meetings", and attempt to obtain information and disrupt the meetings.

KNAPP said that all city officials and corporate officers were required to write their letters of resignation out in advance. These letters were maintained by GEETA and LALITA. The purpose for having these letters written in advance was so that officials could be forced to resign by merely dating the letters and making them public. This was SHEELA's idea in an effort to keep the city officials and corporate officers under her immediate control.

KNAPP informed that SHEELA, VIDYA, HOMA, SU, SAVITA and SHANTI B, were involved in receiving all incoming mail addressed to the different corporate entities at Rajneeshpuram. Every day SHEELA, or one of the aforementioned persons, would receive the mail and open it. All important mail went to SHEELA and the others for review.

Mail logs were kept and after the mail was opened there would be a tag placed on the envelope, routing it to the addressee corporation.

KNAPP also stated that at a corner room in SHEELA's house, at the time, he believes was during the PHELTON WALKER matter, all outgoing personal mail was opened and read. KNAPP said SHEELA was concerned that a conspiracy could be carried out through the U.S. Mail. SHEELA gave the order that all outgoing personal mail be diverted from the U.S. Post Office and brought to the corner room of her residence. There, GEETA and LALITA would steam the envelopes open, or use knives to open them and read the personal mail. KNAPP also said that it is his recollection that they needed individuals who could read foreign languages to assist in this program. KNAPP related that on one or two occasions he assisted

reading this personal mail. KNAPP said that he could not remember exactly why they needed individuals who could read foreign languages and since he did remember that, he is not sure that the incident of the mail openings occurred contemporaneously with the PHELTON WALKER incident. However, he said that if it was not due to the PHELTON WALKER matter he is not sure why SHEELA was motivated to open outgoing personal mail.

KNAPP said that he recalled that the personal mail openings occurred for approximately two to four weeks. He said it was definitely done on SHEELA's orders. KNAPP said SHEELA enjoyed learning the gossip from the opening of the personal mail. He described that usually, a few hundred letters were opened every day. KNAPP said that the letters were always received in a flat cardboard box when they were being opened.

KNAPP also informed that it was possible that the letters were intercepted before they were deposited at the U.S. Post Office since he believes at that time letters were deposited in boxes throughout the commune and picked up by a commune member where they were taken to the U.S. Post Office at Rajneeshpuram.

KNAPP stated that in 1981 or 1982 he remembered that SAMADHI and JAGRUTI were given the assignment by SHEELA to investigate an alleged homosexual relationship between a person by the name of JERRY FRANK and Oregon Senator MARK O. HATFIELD.

KNAPP also informed that in the Fall of 1984, while he was at a legal hearing at Salem, Oregon, he observed YOGINI and PUJA dressed up in wigs and non-Sannyasin clothing outside the Department of Justice at the Supreme Court Building at Salem.

KNAPP also said that his sister, KAVIDO, saw PUJA, on several occasions, dressed in wigs. She observed PUJA change into these wigs within the city limits of the City of Rajneesh (Antelope). She also said that she observed PUJA drive off in the direction of The Dalles.

KNAPP informed that during the course of the meetings pertaining to SHEELA's directing them to do something to the Wasco County Officials that one of their conversations consisted of the possibility of putting termites in DAN DURROW's office and other buildings at The Dalles. They had also discussed the possibility of flying an airplane over Wasco County and dropping weed seeds to infest the countryside with weeds. KNAPP said these discussions took place in 1984 prior to the Wasco County Elections.

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Continuation of FD-302 of DAVID BERRY KNAPP, On 10/29-11/7/85, Page 19

KNAPP related an incident regarding a rigged Rolls Royce raffle held at Rajneeshpuram. He said that SHEELA had the idea of holding a raffle where the prize would be a Rolls Royce. Raffle tickets were sold with the stated purpose that they were donations to the commune. SHEELA sold numerous tickets. Those involved in the raffle were SHEELA and SAVITA. SHEELA discussed the raffle with KNAPP in order to obtain his opinion regarding the legality of the idea.

KNAPP said that he believed the money received for the tickets sold totalled at least \$110,000. He said the money received for the sold tickets was more than the Rolls Royce to be raffled was worth.

Additionally, KNAPP said that SHEELA and SAVITA agreed to approach MANISHA, a Dutch woman, who worked cleaning BHAGWAN's Rolls Royces. SAVITA arranged with MANISHA that MANISHA would be the person who would win the Rolls Royce. The arrangement with MANISHA was that when she won the Rolls Royce she would return the Rolls Royce to the commune saying that she did not need it.

KNAPP said that SHEELA put the ticket which MANISHA bought up her sleeve. She then rolled the basket containing the raffle tickets and buried her arms up to her elbows in the tickets. When her arms were concealed beneath the tickets she pulled out the winning ticket which was MANISHA's.

MANISHA was informed that she won the Rolls Royce and she came forward and declared that she wanted to return it to the commune. SHEELA and she argued about it. SHEELA insisting that she keep the Rolls Royce and MANISHA stating she wanted to return it to the commune. In the end, SHEELA accepted the Rolls Royce and thanked MANISHA for her generosity.

KNAPP informed that SHEELA held an additional raffle for a Rolls Royce; however, on that occasion she picked the winner in advance in the same way as the first raffle. The difference was that on this raffle, SHEELA actually planned to give the Rolls Royce to the winner even though the winner had been selected in advance.

At the drawing the person who won the raffle was a Sannyasin at the Cologne Center in Germany, however, due to the difficulty encountered in exporting the vehicle to Germany, the vehicle was never sent.

KNAPP further furnished information concerning the Rajneesh Financial Services Trust (RFST). He explained that this trust borrowed a lot of money from individual Sannyasins and furnished them six month notes. KNAPP said the reason the trust gave six months notes was because they understood if they gave a note for a longer period of time it would become a security. The note which they gave rolled over at the end of six months and then a new note would be issued in its place.

KNAPP said that the money obtained from these notes was then, in turn, loaned to the Rajneesh Neo-Sannyas International Commune (RNSIC).

KNAPP said that he understood that this method to obtain long term financing without having to report the transaction to any type of regulatory agency.

KNAPP informed that he was aware of this activity occurring in May or June of 1985, and to his knowledge the practice had been going on for approximately a year or more. KNAPP said that he was told of this activity by ANTHONY, VISHUDDHA and SAVITA while he had been attending meetings. He said the purpose for the meetings was to obtain explanations concerning the corporate structures.

At this time, SAVITA expressed her concern about the possibility of Sannyasins all wanting to paid for their notes from RFST and she said that RFST would not be able to pay.

KNAPP informed that SHEELA was constantly concerned about individuals outside Rajneeshpuram posing a threat to the existence of the commune. SHEELA was also obsessed with BHAGWAN's personal protection and the protection of his residence at Lao Tzu. KNAPP said that this concern which SHEELA had for the protection of BHAGWAN and his vision resulted in her ideas which consisted of her conspiracy to murder public officials as well as her plans to disrupt Wasco County officials in the performance of their duties. KNAPP said initially SHEELA's concern was directed outside the community toward the Wasco County and other state and federal officials. Later, SHEELA's concern began to concentrate on threats to BHAGWAN which she perceived to come from within the commune.

KNAPP said that SHEELA made the security plans which consisted of the "38" and also she planned to have the guard shack, known as SHEELA's bedroom, placed above BHAGWAN's residence at Lao Tzu. She also was behind the electrified fence which was placed around BHAGWAN's residence at Lao Tzu.

KNAPP advised that concerning the electrified fence that he recalled on one occasion SHEELA asked him whether it was legal to raise the voltage in the fence up to the point where people would be killed if they touched it. KNAPP recalled that he researched the issue and determined that that would be illegal. KNAPP said that the electrified wires at the top of the outer fence were kept with enough voltage to keep animals out but that the inner fence was possibly electrified with enough voltage to kill someone. He recalled that the peacocks would occasionally blunder into the inner fence and be electrocuted.

KNAPP recalled that sometime in 1984 a meeting was held at which he was present with SHEELA, HASYA, JOHN, SIDDHA, VIDYA, SAVITA and PROBAHDI. The meeting was arranged by KAVISHA. The purpose for this meeting was to attempt and heal the wounds brought about by a feud which had arisen between SHEELA and the Hollywood group of which HASYA, JOHN, KAVISHA and others were members. KNAPP noted that a feud had arisen due to SHEELA's disagreement with HASYA and JOHN regarding the purchase of gifts for BHAGWAN. Specifically, SHEELA was opposed to HASYA purchasing a Calista watch for 2.5 to 3 million dollars. SHEELA perceived that this would be a danger to BHAGWAN.

At the meeting HASYA told SHEELA that she could not say no to BHAGWAN. SHEELA responded by telling her that it was important to learn to say no to BHAGWAN.

As a result of this meeting, KNAPP said that there was a follow-up meeting the next evening at which all those present at the previous meeting which also included HANYA, KAVISHA, DAVID and VIVEK. This meeting was an audience with BHAGWAN. At that meeting, BHAGWAN stated that his secretaries in the past who said no to him were let go. KNAPP said that this indicated to him and SHEELA that BHAGWAN had been informed of the fact that on the previous meeting SHEELA had told HASYA that she had to learn to say no to BHAGWAN. BHAGWAN went on to say that he would have to find his own sources who would provide for his enjoyment. He told SHEELA that she was able to mingle with people while he was alone and was only able to associate with his disciples during his drive-bys.

BHAGWAN then told SHEELA that she would have to make more effort to get along with the Hollywood group. BHAGWAN said that the Hollywood group knew how to get things done and said that he supported them. KNAPP said that SHEELA did not like to hear this from BHAGWAN but gave him lip service that she would indeed try to get along with them. However, in fact, she never had any intention to do so.

KNAPP said that this incident infuriated SHEELA and was really the background for the split between SHEELA and the Hollywood group.

KNAPP said that SHEELA forced HASYA and VIVEK to become friends due to SHEELA's negative attitude toward them both.

KNAPP informed that SHEELA told him that the reason DEVARAJ was BHAGWAN's personal physician was because DEVARAJ had been VIVEK's boyfriend while they were in the Ashram at Poona, India. SHEELA told KNAPP that DEVARAJ was an incompetent doctor and KNAPP said that if anyone at the commune required competent medical attention they would definitely not go to DEVARAJ. He said DEVARAJ was one of a group of general practitioners who operated in the clinic at Poona. KNAPP informed that SHUNYO was BHAGWAN's physician of record because

DEVARAJ did not have a license to practice medicine in Oregon for quite some time.

KNAPP also informed that DEVARAJ was a citizen of the United Kingdom and was from Great Britain. He said that DEVARAJ was married to HASYA in February, 1984. KNAPP characterized this marriage as for the purpose of allowing DEVARAJ to remain in the United States.

In Spring, 1984, SHEELA heard about DEVARAJ and DEVA GEET, whom he described as BHAGWAN's dentist being involved in furnishing BHAGWAN with Nitrous Oxide Gas. SHEELA also heard that DEVARAJ and DEVA GEET were adjusting BHAGWAN's vitamin D level with ultra-violet light. It was SHEELA's opinion that DEVARAJ was not consulting her in regards to BHAGWAN's treatment. SHEELA also was concerned that DEVA GEET was doing root canals on BHAGWAN when the operations were unnecessary. SHEELA referred to DEVA GEET as an "English Butcher." SHEELA told KNAPP that it was her opinion that DEVA GEET worked on BHAGWAN's teeth just in order to be near him.

KNAPP said that there was a conjunctivitis epidemic which infected numerous people at the commune and it was SHEELA's opinion that this conjunctivitis epidemic was a concocted situation in order to remove DEVARAJ and DEVA GEET from BHAGWAN. KNAPP informed that on one occasion DEVARAJ became ill because his coffee had been poisoned. At that time there was an effort made to confine him in the hospital at Koran Grove. At Koran Grove, PUJA put flower water obtained from a flower vase into his IV. PUJA said he got very sick and she was actually frightened that he got as sick as he did.

SHEELA was upset that DEVARAJ had gotten so close to BHAGWAN and wanted him kept at Koran Grove so another doctor could treat BHAGWAN. KNAPP recalled that PUJA said, "I tried everything and then I took the vase." SHEELA wanted DEVARAJ kept in the hospital longer in order to prevent any harm which he might do to BHAGWAN's body. KNAPP believed that this incident occurred in early Summer, 1984. He said DEVARAJ eventually got better.

KNAPP also stated that SHEELA was angry at DEVARAJ because he failed to create an adequate medical history regarding RAJNEESH's health. He noted that SHEELA was concerned because the issue of RAJNEESH's health was one of the reasons for him being admitted to the United States. It was also one of the reasons they intended to use in order to extend his visa. SHEELA told KNAPP that she felt that DEVARAJ should have done a better job in creating a medical record which would support this claim.

KNAPP said that in regards to the conjunctivitis epidemic at Rajneeshpuram, which he had previously eluded to, was that it occurred in Summer, 1984. KNAPP said conjunctivitis was suspected in DEVARAJ and SHEELA gave instructions that all those people who worked close to BHAGWAN would have to be tested for conjunctivitis. KNAPP said he understood the

disease to be an eye disease and very contagious.

After that, SHEELA had the idea to test everyone on the ranch and PUJA and SHEELA arranged for the tests to be conducted.

SHEELA said there was a dispute with other doctors at Rajneeshpuram over whether or not the alleged conjunctivitis was from the dust that is prevalent at the ranch or was actually an infection.

KNAPP noted that most of the people from Lao Tzu ended up in isolation and were placed in Koran Grove under PUJA's care.

KNAPP said DEVARAJ, VIVEK, CHETNA, DEVAGEET and others were put in isolation there.

SHEELA sent JULIAN to Koran Grove as her spy so that he could report their activities. KNAPP said that when JULIAN was put in Koran Grove he argued with all the people from Lao Tzu.

KNAPP said that SHEELA sent a cleaning crew to Lao Tzu while everyone was confined in isolation at Koran Grove. SHEELA then told everyone that Lao Tzu was not being maintained under VIVEK's supervision. SHEELA also wanted to show BHAGWAN that he could do without DEVARAJ, DEVAGEET and VIVEK and also attempted to discredit what they had done while they had been at Lao Tzu.

KNAPP said that while the aforementioned persons were confined at Koran Grove for conjunctivitis, BHAGWAN had an emergency with his teeth and SHEELA called another dentist identified as ANUTOSH GITEN. KNAPP described this person as a man to whom SHEELA was attracted. It was arranged that ANUTOSH would treat BHAGWAN; however, BHAGWAN refused and demanded that DEVARAJ and DEVAGEET work on him. BHAGWAN instructed that they could work on him wearing surgical masks. SHEELA became extremely angry due to this incident. SHEELA became so angry that BHAGWAN had to have a meeting to try to resolve the animosity between those at Lao Tzu and SHEELA's people at Jesus Grove.

KNAPP said that after this incident SHEELA became more convinced than ever that DEVARAJ was incompetent. SHEELA worked very hard to discredit him and have him removed. She was convinced DEVARAJ would end up killing BHAGWAN.

KNAPP said that by early 1985, HASYA, JOHN, DEVARAJ, and VIVEK were all considered to be SHEELA's enemies.

KNAPP said that at about this time he was aware that SHEELA told RIKTA, YOGINI and AVA to start keeping track of where HASYA, JOHN, DEVARAJ, and VIVEK ate at restaurants in order to try and poison them.

KNAPP informed that he remembered an incident when DEVARAJ was at Jesus Grove and something was slipped into his coffee. DEVARAJ was talking to SAVITA and HOMA at the time. He remembered DEVARAJ asking SAVITA if she had drugged him. SAVITA answered that she had not, but KNAPP knew that PUJA had put something in DEVARAJ's coffee in order to get him in Koran Grove which was her assignment given to her by SHEELA.

KNAPP said that at this time, certain associates of SHEELA carried poison around in order to catch the Lao Tzu crowd at restaurants. SHEELA had advised them to, "Always walk around with something, you never know when the opportunity will come up." KNAPP said the group who carried poison with them consisted of VIDYA, PUJA, AVA, YOGINI, SHANTI B and SU.

KNAPP recalled that PUJA furnished him a vial of poison prior to his trip to India in June, 1985. PUJA said, "Here, this is for you." KNAPP remembered that there were two vials and he believed that one vial contained cyanide. The other vial he understood was possibly a hepatitis virus. KNAPP said that he refused to take the bottle of cyanide, but did take the other one. KNAPP described the vials as being two to three inches long, made of glass.

KNAPP said PUJA also furnished PATI PADA a vial. KNAPP said that when he refused the cyanide vial PUJA said, "That's okay, SHEELA has some."

KNAPP said that he believed SU, SHANTI B, SAVITA and VIDYA all carried poison. He believed AVA, YOGINI, RIKTA and PUJA were intended to be the chief poisoners. He informed that DEVARAJ, VIVEK, HASYA and JOHN were the potential targets.

KNAPP said that a group of them began meeting at SHEELA's room in Jesus Grove in around May or June, 1985. He said that these meetings occurred at about the time SHEELA appeared on the Larry King Show in Chicago and at about the same time SHANTI B and RIKTA took their trip in an effort to obtain false identification and firearms. At this meeting SHEELA discussed her concern regarding danger posed by the Lao Tzu people BHAGWAN.

Additionally, it was discovered by SHEELA that there was an inordinant amount of drugs being shipped to Lao Tzu. KNAPP said that DEVARAJ ordered the drugs for Lao Tzu. KNAPP recalled a letter that the commune pharmacist by the name of MADHUNAD had written to BHAGWAN expressing concern regarding the amount of drugs going to Lao Tzu. The thrust of the letter was that the pharmacist did not think that BHAGWAN was aware of the extent of narcotics which were coming into Lao Tzu. KNAPP said that prescriptions were written for people residing at Lao Tzu who had no health problems whatsoever. KNAPP

recalled that SHEELA was delighted with the letter the pharmacist sent and KNAPP said he believed the letter was still in a file which GEETA maintained for SHEELA.

KNAPP said that SHUNYO was probably also writing prescriptions for Lao Tzu people.

KNAPP advised that HOMA later told him that JOHN was very shocked at the amount of drugs that were going into Lao Tzu. KNAPP said that the majority of the drugs were very strong drugs and he recalled they were out of date and not state of the art. He remembered that the drugs were mostly barbiturates, tranquilizers and pain killers.

KNAPP said that SHEELA was of the opinion that the drug problem at Lao Tzu was another justification for getting rid of DEVARAJ. She also said that it presented legal problems for the Rajneesh Medical Corporation and the pharmacy.

KNAPP recalled a meeting was held in early June, 1985, that dealt exclusively with the Lao Tzu situation. He described those present at the meeting as SHANTI B, ANUBHAVO, RAJAN, SU, VIDYA, ANUGITEN, DIPO, HOMA, PUJA, AVA, YOGINI, SAVITA, JULIAN and himself. He also stated that the meeting was held at SHEELA's residence and SHEELA was there. He said prior to this time, meetings had usually been held to discuss external threats but he noted that at this meeting the focus of the meeting changed to the internal enemies at the commune.

KNAPP said the meetings after June, 1985, until the end of the festival in 1985, dealt almost exclusively to the internal threat to BHAGWAN and the commune. He said the Legal Services group was doing lots of briefings and recalled the Lao Tzu people being interviewed on a regular basis.

KNAPP informed that at about this time he became aware of a plan SHEELA had for her inner circle. SHEELA described her inner circle as those people who would drop their morals.

In June, 1985, KNAPP travelled to India with SHEELA. KNAPP said on the way back to the United States from India he became very ill with diarrhea. SHEELA diagnosed his illness as Indian sun poisoning. When he returned to Rajneeshpuram he was confined to bed and PUJA began taking care of him. After PUJA began caring for him he began to get much worse. He said the time he began to get sick was June 10 or 11, 1985. He said that PUJA wanted to give him an IV and KNAPP recalled telling her, "Just like DEVARAJ?" He said PUJA became very angry with this comment.

KNAPP recalled that sometime in 1984 a meeting was held at which he was present with SHEELA, HASYA, JOHN, SIDDHA, VIDYA, SAVITA and PROBAHDI. The meeting was arranged by KAVISHA. The purpose for this meeting was to attempt and heal the wounds brought about by a feud which had arisen between SHEELA and the Hollywood group of which HASYA, JOHN, KAVISHA and others were members. KNAPP noted that a feud had arisen due to SHEELA's disagreement with HASYA and JOHN regarding the purchase of gifts for BHAGWAN. Specifically, SHEELA was opposed to HASYA purchasing a Calista watch for 2.5 to 3 million dollars. SHEELA perceived that this would be a danger to BHAGWAN.

At the meeting HASYA told SHEELA that she could not say no to BHAGWAN. SHEELA responded by telling her that it was important to learn to say no to BHAGWAN.

As a result of this meeting, KNAPP said that there was a follow-up meeting the next evening at which all those present at the previous meeting which also included HANYA, KAVISHA, DAVID and VIVEK. This meeting was an audience with BHAGWAN. At that meeting, BHAGWAN stated that his secretaries in the past who said no to him were let go. KNAPP said that this indicated to him and SHEELA that BHAGWAN had been informed of the fact that on the previous meeting SHEELA had told HASYA that she had to learn to say no to BHAGWAN. BHAGWAN went on to say that he would have to find his own sources who would provide for his enjoyment. He told SHEELA that she was able to mingle with people while he was alone and was only able to associate with his disciples during his drive-bys.

BHAGWAN then told SHEELA that she would have to make more effort to get along with the Hollywood group. BHAGWAN said that the Hollywood group knew how to get things done and said that he supported them. KNAPP said that SHEELA did not like to hear this from BHAGWAN but gave him lip service that she would indeed try to get along with them. However, in fact, she never had any intention to do so.

KNAPP said that this incident infuriated SHEELA and was really the background for the split between SHEELA and the Hollywood group.

KNAPP said that SHEELA forced HASYA and VIVEK to become friends due to SHEELA's negative attitude toward them both.

KNAPP informed that SHEELA told him that the reason DEVARAJ was BHAGWAN's personal physician was because DEVARAJ had been VIVEK's boyfriend while they were in the Ashram at Poona, India. SHEELA told KNAPP that DEVARAJ was an incompetent doctor and KNAPP said that if anyone at the commune required competent medical attention they would definitely not go to DEVARAJ. He said DEVARAJ was one of a group of general practitioners who operated in the clinic at Poona. KNAPP informed that SHUNYO was BHAGWAN's physician of record because

DEVARAJ did not have a license to practice medicine in Oregon for quite some time.

KNAPP also informed that DEVARAJ was a citizen of the United Kingdom and was from Great Britain. He said that DEVARAJ was married to HASYA in February, 1984. KNAPP characterized this marriage as for the purpose of allowing DEVARAJ to remain in the United States.

In Spring, 1984, SHEELA heard about DEVARAJ and DEVA GEET, whom he described as BHAGWAN's dentist being involved in furnishing BHAGWAN with Nitrous Oxide Gas. SHEELA also heard that DEVARAJ and DEVA GEET were adjusting BHAGWAN's vitamin D level with ultra-violet light. It was SHEELA's opinion that DEVARAJ was not consulting her in regards to BHAGWAN's treatment. SHEELA also was concerned that DEVA GEET was doing root canals on BHAGWAN when the operations were unnecessary. SHEELA referred to DEVA GEET as an "English Butcher." SHEELA told KNAPP that it was her opinion that DEVA GEET worked on BHAGWAN's teeth just in order to be near him.

KNAPP said that there was a conjunctivitis epidemic which infected numerous people at the commune and it was SHEELA's opinion that this conjunctivitis epidemic was a concocted situation in order to remove DEVARAJ and DEVA GEET from BHAGWAN. KNAPP informed that on one occasion DEVARAJ became ill because his coffee had been poisoned. At that time there was an effort made to confine him in the hospital at Koran Grove. At Koran Grove, PUJA put flower water obtained from a flower vase into his IV. PUJA said he got very sick and she was actually frightened that he got as sick as he did.

SHEELA was upset that DEVARAJ had gotten so close to BHAGWAN and wanted him kept at Koran Grove so another doctor could treat BHAGWAN. KNAPP recalled that PUJA said, "I tried everything and then I took the vase." SHEELA wanted DEVARAJ kept in the hospital longer in order to prevent any harm which he might do to BHAGWAN's body. KNAPP believed that this incident occurred in early Summer, 1984. He said DEVARAJ eventually got better.

KNAPP also stated that SHEELA was angry at DEVARAJ because he failed to create an adequate medical history regarding RAJNEESH's health. He noted that SHEELA was concerned because the issue of RAJNEESH's health was one of the reasons for him being admitted to the United States. It was also one of the reasons they intended to use in order to extend his visa. SHEELA told KNAPP that she felt that DEVARAJ should have done a better job in creating a medical record which would support this claim.

KNAPP said that in regards to the conjunctivitis epidemic at Rajneeshpuram, which he had previously eluded to, was that it occurred in Summer, 1984. KNAPP said conjunctivitis was suspected in DEVARAJ and SHEELA gave instructions that all those people who worked close to BHAGWAN would have to be tested for conjunctivitis. KNAPP said he understood the

disease to be an eye disease and very contagious.

After that, SHEELA had the idea to test everyone on the ranch and PUJA and SHEELA arranged for the tests to be conducted.

SHEELA said there was a dispute with other doctors at Rajneeshpuram over whether or not the alleged conjunctivitis was from the dust that is prevalent at the ranch or was actually an infection.

KNAPP noted that most of the people from Lao Tzu ended up in isolation and were placed in Koran Grove under PUJA's care.

KNAPP said DEVARAJ, VIVEK, CHETNA, DEVAGEET and others were put in isolation there.

SHEELA sent JULIAN to Koran Grove as her spy so that he could report their activities. KNAPP said that when JULIAN was put in Koran Grove he argued with all the people from Lao Tzu.

KNAPP said that SHEELA sent a cleaning crew to Lao Tzu while everyone was confined in isolation at Koran Grove. SHEELA then told everyone that Lao Tzu was not being maintained under VIVEK's supervision. SHEELA also wanted to show BHAGWAN that he could do without DEVARAJ, DEVAGEET and VIVEK and also attempted to discredit what they had done while they had been at Lao Tzu.

KNAPP said that while the aforementioned persons were confined at Koran Grove for conjunctivitis, BHAGWAN had an emergency with his teeth and SHEELA called another dentist identified as ANUTOSH GITEN. KNAPP described this person as a man to whom SHEELA was attracted. It was arranged that ANUTOSH would treat BHAGWAN; however, BHAGWAN refused and demanded that DEVARAJ and DEVAGEET work on him. BHAGWAN instructed that they could work on him wearing surgical masks. SHEELA became extremely angry due to this incident. SHEELA became so angry that BHAGWAN had to have a meeting to try to resolve the animosity between those at Lao Tzu and SHEELA's people at Jesus Grove.

KNAPP said that after this incident SHEELA became more convinced than ever that DEVARAJ was incompetent. SHEELA worked very hard to discredit him and have him removed. She was convinced DEVARAJ would end up killing BHAGWAN.

KNAPP said that by early 1985, HASYA, JOHN, DEVARAJ, and VIVEK were all considered to be SHEELA's enemies.

KNAPP said that at about this time he was aware that SHEELA told RIKTA, YOGINI and AVA to start keeping track of where HASYA, JOHN, DEVARAJ, and VIVEK ate at restaurants in order to try and poison them.

KNAPP informed that he remembered an incident when DEVARAJ was at Jesus Grove and something was slipped into his coffee. DEVARAJ was talking to SAVITA and HOMA at the time. He remembered DEVARAJ asking SAVITA if she had drugged him. SAVITA answered that she had not, but KNAPP knew that PUJA had put something in DEVARAJ's coffee in order to get him in Koran Grove which was her assignment given to her by SHEELA.

KNAPP said that at this time, certain associates of SHEELA carried poison around in order to catch the Lao Tzu crowd at restaurants. SHEELA had advised them to, "Always walk around with something, you never know when the opportunity will come up." KNAPP said the group who carried poison with them consisted of VIDYA, PUJA, AVA, YOGINI, SHANTI B and SU.

KNAPP recalled that PUJA furnished him a vial of poison prior to his trip to India in June, 1985. PUJA said, "Here, this is for you." KNAPP remembered that there were two vials and he believed that one vial contained cyanide. The other vial he understood was possibly a hepatitis virus. KNAPP said that he refused to take the bottle of cyanide, but did take the other one. KNAPP described the vials as being two to three inches long, made of glass.

KNAPP said PUJA also furnished PATI PADA a vial. KNAPP said that when he refused the cyanide vial PUJA said, "That's okay, SHEELA has some."

KNAPP said that he believed SU, SHANTI B, SAVITA and VIDYA all carried poison. He believed AVA, YOGINI, RIKTA and PUJA were intended to be the chief poisoners. He informed that DEVARAJ, VIVEK, HASYA and JOHN were the potential targets.

KNAPP said that a group of them began meeting at SHEELA's room in Jesus Grove in around May or June, 1985. He said that these meetings occurred at about the time SHEELA appeared on the Larry King Show in Chicago and at about the same time SHANTI B and RIKTA took their trip in an effort to obtain false identification and firearms. At this meeting SHEELA discussed her concern regarding danger posed by the Lao Tzu people BHAGWAN.

Additionally, it was discovered by SHEELA that there was an inordinant amount of drugs being shipped to Lao Tzu. KNAPP said that DEVARAJ ordered the drugs for Lao Tzu. KNAPP recalled a letter that the commune pharmacist by the name of MADHUNAD had written to BHAGWAN expressing concern regarding the amount of drugs going to Lao Tzu. The thrust of the letter was that the pharmacist did not think that BHAGWAN was aware of the extent of narcotics which were coming into Lao Tzu. KNAPP said that prescriptions were written for people residing at Lao Tzu who had no health problems whatsoever. KNAPP

recalled that SHEELA was delighted with the letter the pharmacist sent and KNAPP said he believed the letter was still in a file which GEETA maintained for SHEELA.

KNAPP said that SHUNYO was probably also writing prescriptions for Lao Tzu people.

KNAPP advised that HOMA later told him that JOHN was very shocked at the amount of drugs that were going into Lao Tzu. KNAPP said that the majority of the drugs were very strong drugs and he recalled they were out of date and not state of the art. He remembered that the drugs were mostly barbiturates, tranquilizers and pain killers.

KNAPP said that SHEELA was of the opinion that the drug problem at Lao Tzu was another justification for getting rid of DEVARAJ. She also said that it presented legal problems for the Rajneesh Medical Corporation and the pharmacy.

KNAPP recalled a meeting was held in early June, 1985, that dealt exclusively with the Lao Tzu situation. He described those present at the meeting as SHANTI B, ANUBHAVO, RAJAN, SU, VIDYA, ANUGITEN, DIPO, HOMA, PUJA, AVA, YOGINI, SAVITA, JULIAN and himself. He also stated that the meeting was held at SHEELA's residence and SHEELA was there. He said prior to this time, meetings had usually been held to discuss external threats but he noted that at this meeting the focus of the meeting changed to the internal enemies at the commune.

KNAPP said the meetings after June, 1985, until the end of the festival in 1985, dealt almost exclusively to the internal threat to BHAGWAN and the commune. He said the Legal Services group was doing lots of briefings and recalled the Lao Tzu people being interviewed on a regular basis.

KNAPP informed that at about this time he became aware of a plan SHEELA had for her inner circle. SHEELA described her inner circle as those people who would drop their morals.

In June, 1985, KNAPP travelled to India with SHEELA. KNAPP said on the way back to the United States from India he became very ill with diarrhea. SHEELA diagnosed his illness as Indian sun poisoning. When he returned to Rajneeshpuram he was confined to bed and PUJA began taking care of him. After PUJA began caring for him he began to get much worse. He said the time he began to get sick was June 10 or 11, 1985. He said that PUJA wanted to give him an IV and KNAPP recalled telling her, "Just like DEVARAJ?" He said PUJA became very angry with this comment.

During the time he was ill, KNAPP said SHEELA began having very intense meetings. He remembered that he would be dragged out of his sick bed to attend. The meetings would cheaply cover what they should do regarding the Lao Tzu situation. KNAPP said that around this time DEVARAJ was poisoned with the coffee while he was drinking it on the porch at Jesus Grove. He remembered that DEVARAJ was there for a meeting discussing the drug situation at Lao Tzu. He said that PUJA furnished SAVITA, HOMA or VIDYA with something to give DEVARAJ and DEVARAJ ended up again in a ward at Koran Grove.

As a result of this poisoning, DEVARAJ was kept at Koran Grove and SHEELA planned to keep him there so another doctor could treat BHAGWAN.

KNAPP recalled that between June 11 and June 30, 1985, he started to feel things were going too far. He recalls that at about this time he began to speak out against SHEELA's plan and he began to fall from SHEELA's favor. It was at this point that the plans to kill DEVARAJ and VIVEK became more formalized. KNAPP said that the people who were aware of the plan to kill DEVARAJ and VIVEK were: SU, VIDYA, JULIAN, AVA, YOGINI, SHEELA, SAVITA, KNAPP, ANUGITEN, PUJA, DIPO, PADMA, PATI PADA, SHANTI B, ANUBHAVO, JAYANANDA, HOMA and others.

KNAPP said individuals who later found out about the plan included: SAGUN, DURGA, PRAVODHI, BODHI, JAYAMALA, DOLMA, RIKTA, and RAJAN.

KNAPP recalled that JAYANANDA and BODHI objected to the plan and recalled PADMA and PATI PADA had doubts. He said VIDYA also had doubts but went along with all plans.

KNAPP explained that all participants in this plan felt that they were in it in order to protect BHAGWAN's life. KNAPP said there were a number of meetings held that summer by SHEELA at her residence and he advised that most of the people he identified were in attendance.

KNAPP said that JAYANANDA and BODHI opposed and constantly objected to plans and plots to kill VIVEK and DEVARAJ.

KNAPP recalled that at the meetings there were brainstorming sessions which included ideas on how to kill VIVEK and DEVARAJ.

KNAPP recalled one plan was to get VIVEK to drive off Rajneeshpuram and Rancho Rajneesh and there ANUGITEN would have a tractor waiting up the hill which would cause an accident. Then the vehicle would be pushed over a cliff. KNAPP said that idea was never pursued.

SHANTI B suggested that she would simply stop VIVEK's car and shoot her and DEVARAJ. KNAPP said that idea was also not pursued.

KNAPP described a meeting in June, 1985, wherein it was decided that VIVEK should be killed that evening. The meeting was held in SHEELA's room and SHEELA was sitting on her bed. He remembered SHEELA saying, "We have to do something." KNAPP said they began discussing plans to kill VIVEK. The plan which was ultimately adopted was that SU and certain helpers, whom KNAPP did not recall, would go to VIVEK's room at Lao Tzu and place an anesthetic over her face to either kill her or make her unconscious. KNAPP believed that once she was unconscious she would be killed with an injection. KNAPP recalled that there was some concern as to whether VIVEK's screams would wake other people in the residence and it was decided that they probably would not.

KNAPP remembered that PUJA gave the anesthetic to SU who put it in her pocket. He also described that SU cut her fingernails in case she had a fight with VIVEK and she did not want VIVEK's flesh under her nails in the event she was discovered.

The plan also included that DOLMA would furnish a master key which would unlock VIVEK's door. KNAPP believed that DOLMA did furnish a key.

KNAPP said that VIDYA changed the security guard roster for those people who were scheduled to guard Lao Tzu during that night. This was done in order for the conspirators to be on the guard post when the attempted murder took place. KNAPP recalled that this meeting took place at approximately 9:00 to 10:00 p.m. when the change in guard personnel was to take place no later than 12:30 a.m. He said SU volunteered for the mission of "taking care of VIVEK" but she was extremely fearful.

He said after SU volunteered others volunteered for jobs and eventually most had a job. He recalled that ANUBHAVO was on the gate at Lao Tzu and he believed PATI PADA and PADMA possibly had SHEELA's bedroom post, the guard shack above Lao Tzu.

KNAPP remembered the following persons were at the meeting: JULIAN, SHEELA, VIDYA, ANUBHAVO, PATI PADA, SAVITA, SU, himself and PUJA.

KNAPP said that he believes the following individuals were at the meeting but he is not one hundred percent certain: DOLMA, PADMA, AVA, YOGINI, ANUGITEN, SHANTI B, HOMA and RIKTA.

KNAPP said he stayed at SHEELA's room and the others went out with the purpose of killing VIVEK. He said SU went to Lao Tzu and attempted to enter VIVEK's room with the key; however, the key did not work. He remembered that SU returned with a severe headache and was extremely nauseas from her exposure to the anesthetic. He remembered that SU was ill for approximately twenty four hours after the incident.

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DAVID BERRY KNAPP

10/29-11/7/85

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PUJA took care of SU and KNAPP said he saw the anesthetic in the plastic bag and believed there was a cloth soaked with some type of substance. He remembered some conversation that concerned the rate of evaporation of the substance and he saw SU return the cloth and bag to PUJA. KNAPP remembered hearing SU say, "The key didn't work." After the attempt, SHEELA was very supportive of SU and said, "At least she had the guts to try."

Within three to four days KNAPP said another meeting was held at SHEELA's room. He remembered that he and JAYANANDA were being blasted by SHEELA for having, "cold feet." He recalled this was SAGUN's first meeting. Also present at the meeting were the following: JAYANANDA, SHEELA, JAYAMALA, JULIAN, VIDYA, SAVITA, SU, PADMA, SHANTI B, PRAVODHI and SAGUN. KNAPP said that AVA may have been there but he is not certain.

Soon after that meeting was held, approximately one or two days later, another meeting was called where more plans were made to kill DEVARAJ. At that time DEVARAJ was at a hospital ward in Koran Grove and the main plan at the meeting was how to enter the ward and murder DEVARAJ.

KNAPP said that the plan developed was to simply jump him in his bed, hold a pillow over his head, and inject him with a substance which would kill him. KNAPP said that he, ANUBHAVO, JULIAN and ANUGITEN conducted rehearsals at Jesus Grove where they sneaked into a room with JAYANANDA as the first practice patient and KNAPP as the second. KNAPP said when he was acting as the patient he jumped up very quickly to demonstrate the ridiculous plan they had to jump DEVARAJ. KNAPP said that it was his opinion that the plan would not be practical.

KNAPP said the plan was eventually formalized and the plan was attempted either on the same night as the meeting was held or the following night.

KNAPP said the first night the attempt was unsuccessful. He recalled that this time SHEELA told him that SAGUN was sent to Koran Grove to watch over DEVARAJ.

KNAPP informed that the first attempt on DEVARAJ's life consisted of a plan to put an anesthetic over DEVARAJ's mouth and when he was rendered unconscious he was to be injected with a substance which would cause his death.

KNAPP said that at the first attempt he believed there were SHANTI B, JULIAN, ANUGITEN and possibly YOGINI and AVA. KNAPP said that he believed when JULIAN attempted to open the door someone said something at the hospital

room and the attempt was abandoned.

KNAPP said there may have been another attempt but he does not recall the details.

On the occasion of the next meeting, which occurred within a matter of days, occurred in SHEELA's room. KNAPP recalled SHEELA saying to KNAPP, "Are you ready to do something?". KNAPP told her that he was and SHEELA told him to go check out DEVARAJ.

KNAPP said after this, he, SHANTI BHADRA, SAVITA and ANUBHAVO along with others drove to a dark spot near Koran Grove and parked their car between the warehouses located at the Radass area. The group walked to Koran Grove along the stream and SHANTI B and KNAPP waited beneath the stairs of DEVARAJ's hospital trailer. KNAPP remembered ANUBHAVO and someone else waiting further away. They went in and SAVITA went around and opened the door. KNAPP opened a door to the wrong room and he recalled hearing a very loud noise. He said someone in the room got up and looked at him. KNAPP said he then went down the hall and opened the door to the boiler room making another loud noise. At that point it was determined that he had made so much noise that the group had to leave. KNAPP remembered that during that attempt SHANTI B was carrying a hypodermic needle and he remembered it was his job to put the pillow over DEVARAJ's head along with others. He said that night SAGUN was in the next room. KNAPP said when they returned to Jesus Grove it was first considered to be a funny incident and then everyone became angry at him for making so much noise and sabotaging the attempt. He remembered the SHEELA was very angry.

KNAPP recalled that around June 18 or 19, 1985, he was very ill and had to be confined at Koran Grove. He said he had the gout and was extreme pain from cramps and diarrhea. KNAPP remembered the YOGINI moved in next door to him with what he described as a minor cough. KNAPP became very suspicious and stayed awake all night worrying whether or not YOGINI was there to kill him. He said he went to SHEELA when he was released and accused her of trying to kill him. SHEELA just waved her hand at him with disgust.

KNAPP informed that during 1985, a press conference was held at Rajneeshpuram to discuss a lost suit which he said was referred to as "God vs. The Universe." He described the suit as being the one where the commune had filed a suit against the INS and was probably listed as PATI PADA vs. EDWARD MEECE. He related that he remembered the incident because at that time he had just been released from Koran Grove and was ill prior to the press conference.

KNAPP remembered that he was happy to be out of Koran Grove and more meetings were held regarding the planning of DEVARAJ's murder. The meetings were started when SHEELA returned from out of town. KNAPP remembered that the meetings continued to be held regularly until the festival in 1985. This would have been at about June 30, 1985. He described the duration of the festival from June 30, 1985 to July 6, 1985. KNAPP said the meetings were not as frequent during the festival as before since the conspirators had other duties relating to the festival.

KNAPP said it was during this time that SHEELA told the conspirators about a tape recording which had been obtained through the bug at Lao Tzu wherein DEVARAJ discussed BHAGWAN's death with BHAGWAN.

KNAPP said a meeting was held on July 5, 1985, attended by the conspirators at which time they discussed the necessity of killing DEVARAJ. SHEELA said DEVARAJ must be killed before July 6, 1985.

KNAPP said someone in the group suggested that since BHAGWAN was now having chaotic satsangs where the physical activity and noise was very loud that DEVARAJ could be murdered during one of these satsangs. KNAPP said it was PUJA's idea to inject DEVARAJ with pure adrenalin because she explained that it was non-traceable and was most likely to succeed in killing. DURGA, also a nurse, concurred with PUJA's analysis.

PUJA also said that due to the excitement of the satsang, if a slight amount of adrenalin was detected it would be explained by the excitement associated with that moment.

KNAPP remembered there was some discussion as to whether the injection would leave a needle mark and KNAPP asked if a tissue sample were taken at the injection point would that show the adrenalin. PUJA answered that it would probably show up if the tissue sample was taken right after the injection, however, PUJA felt that would be unlikely.

SHEELA said that something had to be done and KNAPP said that she wanted it done right away.

The plan which was finally excepted was that SHANTI B would inject DEVARAJ with adrenalin when the satsang was at its most chaotic moment. Probably when BHAGWAN stood up and started waving his arms. SHEELA said to SHANTI B that she was the only one who could handle it. SHANTI B said, "I can handle it" and SHEELA said, "Great."

Then KNAPP said other persons began to volunteer for jobs. He recalled that YOGINI said that they would be back near the music. He remembered JULIAN saying that he would be back next to the musicians near the sound mixture. SHEELA assigned JULIAN and SAGUN the responsibility of taking care of the needle. SHANTI B agreed to throw the needle behind her after she injected DEVARAJ when JULIAN and SAGUN would take the needle and dispose of it. JULIAN responded to this assignment by saying, "Okay, no problem, we'll burn it."

At the meeting they also discussed which individuals would substitute for the regular security guards at the satsang. VIDYA and SU had the responsibility for arranging for the security. It was decided that KNAPP, PATI PADA, PADMA and DOLMA would be at the satsang for legitimate security assignments. There was also a discussion about slowing down the medical response after DEVARAJ had been injected and his condition had been discovered. KNAPP said that his assignment was to occupy the back section of the hall dressed in plain clothes and the women would be in front dressed in Peace Force uniforms carrying weapons. KNAPP remembered that there was scaffolding on the left rear of the hall that held the video tape people and he believed that SAMADHI was supposed to be back there as a lookout.

After the injection, the plan was for JULIAN and SAGUN to take the needle in JULIAN's car and get rid of it. VIDYA may have been placed at the Mirdad Reception Center so she would not be accused of anything. However, KNAPP believed probably ended up in the hall with SU around the time of the attempt. KNAPP said SHEELA was driving BHAGWAN on that day. KNAPP said ANUGITEN and RIKTA would have replaced the security guards who were assigned to the elevated box in the hall. He believed he would have been armed with Uzi's. JAYAMALA was also in the hall. KNAPP believed that PUJA probably stayed at Jesus Grove in SHEELA's room. KNAPP said that he observed PUJA furnishing SHANTI B several syringes at Jesus Grove, the evening before the attempt. SHANTI B tried each of these syringes out to see how they would feel. He recalled that SHANTI B practiced with a syringe on an orange or some similar type fruit, by holding the syringe in her hand and making some kind of sweeping motion at the fruit. SHANTI B eventually selected a syringe she was comfortable with and practiced using it in her right hand until she felt competent.

On the morning of July 6, 1985, everyone began to take their place at the hall for the satsang. KNAPP stationed himself at the rear of the hall with a two-way radio. He remembered that DOLMA had a radio and was situated at the front of the hall. KNAPP remembered JULIAN situating himself in the back and KNAPP said he did not see SAGUN or SHANTI B. KNAPP did say he saw YOGINI and AVA at the rear of the hall. KNAPP said that it was decided to allow people to sit in the hall without creating the usual passageway since it was felt that this would create more chaos in the meeting hall around the site of the proposed injection.

KNAPP said he was in the hall when he saw SHANTI B who passed him and said, "Have you seen PRATIMA?". KNAPP said SHANTI B seemed very calm and walked by as he stopped her and said, "Should I call her on the radio?". He later found out that SHANTI B was looking for PRATIMA to complain that DEVARAJ was acting crazy in the hall accusing her of injection him with a syringe. KNAPP said it was around this time that he saw JULIAN and JULIAN told him that DEVARAJ was on the grass and obviously in a great deal of difficulty.

An ambulance was called and someone mentioned to KNAPP that DEVARAJ was asking for SHUNYO who was a doctor attending the satsang. KNAPP said he help put DEVARAJ on the stretcher when the ambulance arrived and made eye contact with him. He described DEVARAJ as having a very sickly color and appeared to be sweating. He said SU was also there at that time and he remembered another radio call was made to clear a path so the ambulance could get around the building and through the people.

DEVARAJ was taken away by ambulance and KNAPP returned to Jesus Grove. KNAPP believed DEVARAJ was taken to Pathagoras Clinic for emergency care. Sometime after KNAPP returned to Jesus Grove he heard SHEELA on the telephone to VIVEK and remembered waving KNAPP over to the telephone and asking him, "Did anyone see SHANTI B?".

SHEELA later put YOGINI on the phone and KNAPP became aware that VIVEK was trying to obtain information regarding DEVARAJ's accusations that SHANTI B stabbed him with a needle while he was in the hall.

KNAPP said he heard SHEELA say, "K.D. and YOGINI were there and they did not see anything." KNAPP realized that SHEELA was using him as an excuse and he also heard SHEELA say, "I'll check it out." KNAPP monitored the Lao Tzu telephones and bugs to determine what the attitude was at the people of Lao Tzu concerning this attempt on DEVARAJ's life and to determine whether or not they believed he had actually been injected.

KNAPP recalled that later SHANTI B returned and SHEELA was very protective of her. KNAPP said SHANTI B was very calm about the whole thing. He remembered SHANTI B saying that it went well and that there was a struggle but that she made the most of it. SHANTI B demonstrated how she reached to DEVARAJ and had some trouble finding her way through his robes. SHANTI B laughed at KNAPP for calling her back to ask about her search for PRATIMA at the hall.

KNAPP remembered that SHANTI B was concerning about whether or not someone had picked up the needle. KNAPP remembered SHANTI B saying that DEVARAJ had said, "You injected me, you injected me."

YOGINI said that she had been with DEVARAJ at the time playing dumb and attempting to convince DEVARAJ that nothing had happened. KNAPP also said that a person named TARU was there and that DEVARAJ was pulling up his robe and pointing to the spot where he believed SHANTI B had injected him. KNAPP said that apparently everyone believed DEVARAJ was crazy. SHANTI B then said, "Okay, DEVARAJ, if you're going to act like that I'm going to leave."

KNAPP said there was a continual monitoring of the situation at DEVARAJ's bedside. He recalled shortly after the injection that there was a serious question as to whether he would live or die. He described the scene at SHEELA's house at Jesus Grove as chaotic. He remembered SHEELA saying, "Oh shit, what if he lives?"

KNAPP said that GATHA had jumped in to save DEVARAJ and he believes that GATHA saved his life.

KNAPP recalled that during this time VIVEK called and had a number of questions for SHEELA concerning SHANTI B's location and also that BHAGWAN wanted her to drug SHANTI B in order to get to the truth. BHAGWAN even suggested, according to VIVEK, that SHANTI B be beaten in order to arrive at the truth.

KNAPP said that SHEELA played it straight and was acting like she was going to investigate to find out what was going on concerning the allegations that SHANTI B had injected DEVARAJ.

KNAPP said that later that day they received information that DEVARAJ would probably survive.

A meeting was held that afternoon or evening at SHEELA's room at Jesus Grove and JULIAN reported on what was happening with DEVARAJ. JULIAN also reported what he had done with the needle. JULIAN informed that he and JAYAMALA had buried the needle near Sabhuti Grove and Moses Grove. KNAPP said there was a general "freak out" that DEVARAJ was going to live.

SHEELA immediately said that they had to try and kill DEVARAJ again. KNAPP said he believed that SHEELA sent RIKTA and DURGA to the hospital in Bend, where DEVARAJ had been subsequently taken, to see if they could poison DEVARAJ's IV's. KNAPP said that he was aware that they had poison with them but he does not recall the outcome of the trip. KNAPP believed nothing occurred.

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KNAPP informed that after the attempt on DEVARAJ's life someone in the group got DEVARAJ's robe, perhaps SAMADHI, and it was washed so there would be no injection marks. KNAPP believes DURGA was the one that got the robe and later discovered a safety pin attached to the robe. KNAPP said that this was a miracle.

It was decided that the story would be that DEVARAJ had pricked himself with the safety pin attached to his robe and in a moment of panic had a heart attack believing he had been stabbed with a needle.

The plan consisted that DURGA would give the robe to a representative from Lao Tzu and pretend to discover the pin at the same time. KNAPP said that it was the answer to their problem.

KNAPP said that this did, in fact, work and that they determined from overhears on the bugs and wiretaps at Lao Tzu that the only people who believed DEVARAJ had been injected were HASYA and DEVARAJ.

KNAPP said that SHANTI B never appeared to upset about what she had done. SHEELA constantly reassured her that she would take care of her. SHEELA said that there was money to take care of people who did "special things" for her.

KNAPP said in regard to special funds, that in January, 1985, when he accompanied SHEELA to Europe, he and SHEELA were with DIPO in Zurich. At that time he heard SHEELA discuss the possibilities of setting up Swiss bank accounts in Zurich. KNAPP said that if it did not have to do with setting up a bank account, it definitely had to do with a bank account transaction at Zurich, Switzerland.

KNAPP said that he was aware of other attempted poisonings by Sannyasins at the direction of SHEELA.

KNAPP said that during the defamation trial of the DONNA SMITH-QUICK case against SHEELA in May, 1984, held at Multnomah County Courthouse in Portland, that PUJA took something to the courthouse with her. KNAPP said that PUJA put some liquid in the water pitcher at GARY MC MURRY's counsel table. He said GARY MC MURRY was the attorney representing DONNA SMITH-QUICK. PUJA placed this material in the water pitcher in order to knock the attorney out during the court case.

KNAPP recalled that the people present at this time were SHEELA, JAYANANDA, PADMA, PUJA and he. KNAPP said that he later learned that someone in the group said they observed MC MURRY drinking from the contaminated water. However, nothing apparently happened to MC MURRY and the trial proceeded without interruption.

KNAPP said that SHEELA instructed AVA and YOGINI to take every advantage they could to follow HASYA and JOHN. They talked about attempting to kill HASYA while HASYA was in England. SHEELA said she wanted to know where HASYA's apartment was when HASYA would be staying in England. According to KNAPP, HASYA was in England for approximately one to two weeks or more.

KNAPP said that SHEELA's motivation for wanting to poison HASYA was to stop her from purchasing luxury items for BHAGWAN.

KNAPP said he was also present when SHEELA and PUJA discussed the possibility of using venomous snakes to kill people. They were reminded of this idea when they read of an incident concerning a rattle snake being placed in a mailbox in an attempt to kill a lawyer against the Synanon Organization in Southern California. Additionally, they discussed the idea of using black widow spiders to kill people.

KNAPP informed that in 1984, BHAGWAN expelled VIVEK from the commune. KNAPP said she was sent to England and later BHAGWAN finally agreed to allow her to return to Rajneeshpuram. At that time, SAVITA knew where VIVEK resided while she was in England. SHEELA and SAVITA both discussed how they regretted not having killed VIVEK while she was in England.

KNAPP also said that VIVEK had apparently attempted to commit suicide on at least two occasions while at Rajneeshpuram. According to KNAPP, BHAGWAN told SHEELA that he wished VIVEK could do the job right. SHEELA interpreted this to mean that BHAGWAN was really telling her that it was okay to kill VIVEK.

In 1983, VIVEK resided at Jesus Grove. KNAPP said that SHEELA always expressed her regrets to him for not killing her at that time.

KNAPP said that SHEELA told him and others that BHAGWAN said on several occasions that "a master's life is worth a million other lives." BHAGWAN said, "Life is meaningless unless one is enlightened." His message was that if a million died to save one enlightened master it is okay.

KNAPP said that he left Rajneeshpuram on September 15, 1985.

On September 20, 1985, KNAPP said he contacted Attorney MARK BLACKMAN at Portland, Oregon. KNAPP informed that the purpose for this contact was to have BLACKMAN make an initial inquiry to determine whether or not KNAPP needed legal representation.

On September 22, 1985, he received word from BLACKMAN that he would represent him and that he would contact state and federal authorities to determine exactly what KNAPP's status was in connection with their investigations.

KNAPP said that meanwhile, Attorney JACK RANSOM was contacted by the commune and asked to represent the interest of the commune at Rajneeshpuram. KNAPP advised that RANSOM and BLACKMAN are partners at the same firm.

BLACKMAN later told KNAPP that NIREN, Mayor of Rajneeshpuram, told him that he wanted BLACKMAN to be a general representative of the people at the commune to assess their legal problems and give them general advice. NIREN told BLACKMAN that the interests of the commune were paramount and the individual interests were inferior to the commune's.

BLACKMAN said that he would not represent individuals in this matter due to a conflict of interest. However, according to BLACKMAN, JACK RANSOM thought things could be worked out. KNAPP said that around September 26, 1985, he and Attorney MARK BLACKMAN were exploring whether or not there had arisen a conflict of interest between BLACKMAN representing KNAPP and RANSOM representing the interests of the Rajneesh Neo-Sannyas International Commune (RNSIC).

KNAPP was asked to release his attorney and informed that the community would secure counsel for him, however, KNAPP refused.

The decision was finally made that KNAPP would speak mainly to MARK BLACKMAN and the commune would deal with JACK RANSOM. However, his girlfriend, DIANE (SAGUN), told her story to MARK BLACKMAN and at that time BLACKMAN decided there was a conflict of interest and suggested that KNAPP and DIANE both obtain separate attorneys. It had also become clear that a conflict had arisen between KNAPP and the commune.

KNAPP initially returned to Rajneeshpuram on the first weekend of October which would have been October 4, 5 and 6, 1985. At that time he stayed at the Hotel Rajneesh at Rajneeshpuram. KNAPP observed that the different law firms had actually converted hotel rooms to law offices. They had even gone to the extent of hanging their law firm's names on the door. KNAPP said RANSOM's office contained a whole stack of files, including some from the Rajneesh Financial Services Trust (RFST).

While in RANSOM's room, RANSOM told KNAPP that the government had seen the files but when they came back they sure were surprised when some of the records they expected to find were not there. RANSOM, according to KNAPP, was referring to the instance when the State of Oregon and Federal Government served search warrants and failed to find records identified in the warrants.

KNAPP also advised that on September 30, 1985, he met VEETRAGA, his sister KAVIDO and NIREN at the Flight Craft Air Service in Portland. He said NIREN was there and wanted to talk to him. He said that he and NIREN and the others went to a Mexican restaurant in Portland. NIREN told him that a lot of shit was coming down. He said there was evidence that AVA was involved in crimes and that there appeared to have been bugging, wiretaps, attempted murder of DEVARAJ and other crimes at the commune. NIREN told them that the commune was in desperate need for a good law firm.

NIREN also told KNAPP that he had seen BHAGWAN on six occasions.

NIREN told KNAPP that if he wanted to return to Rajneeshpuram he would be given an audience with BHAGWAN and be able to talk to him in private if he wanted to. KNAPP explained that for a Sannyasin this would be a real privilege to have an audience with BHAGWAN. NIREN said, "We'll protect the community, we'll do everything possible to see that it will survive." KNAPP informed that after this conversation he talked to his attorney, MARK BLACKMAN, and told him to run interference to delay any type of personal contact between him and BHAGWAN.

KNAPP informed that he became convinced that there was a cover up going on at Rajneeshpuram during the investigation by the Oregon State Police, Oregon State Attorney General's Office and the Federal Bureau of Investigation in late September and early October, 1985. He based this opinion on the fact that one, KNAPP said, he talked to JACK RANSOM, who told him that AVA told him about the PHELTON WALKER story. In this story the persons involved in the PHELTON WALKER matter were identified with the exception of KNAPP, GOTHA and JAYANANDA. DIPO's name was added as a person who was a participant. KNAPP said he knew this was false. DIPO definitely was not there and when GOTHA, JAYANANDA and his name were eliminated from AVA's story, he convinced him that the people who were present at Rajneeshpuram were to be protected while all the ones who left were to be accused of crimes. Two, KNAPP also heard the story that the room built under SHEELA's room was for SHEELA's personal use and not BHAGWAN's. KNAPP said this was false, that he knew the secret room under SHEELA's room was for BHAGWAN in case of an INS raid or other emergency. This was an additional fact which led KNAPP to believe that the people at the commune were accusing those who left and protecting those remaining. Three, KNAPP received information that the drugs purchased for Lao Tzu were going to PUJA and not DEVARAJ. KNAPP knew this was untrue, that PUJA had nothing to do with the purchase of drugs for Lao Tzu and that it was DEVARAJ who was responsible for the purchases. This fact also made KNAPP believe that information was put out to accuse those who left and protect those remaining.

KNAPP said that he has read the affidavit prepared by SAMYA wherein she claims she was at a meeting at which time the poisoning of DEVARAJ was discussed. SAMYA's affidavit included the names of all people who left. According to KNAPP, this affidavit is false. SAMYA was never at a meeting to hear any of the plans because SAMYA was not trusted. Also, KNAPP never heard of a meeting where as few people as SAMYA identified were in attendance.

KNAPP informed that his sister KAVIDO heard that there was a meeting involving BARKHA, VEETRAGA, SAMYA, ARUP and others. During the course of the discussion at this meeting, BARKHA said that things have not changed at all, that they were hiding evidence just like they used to.

Another meeting of the 38 occurred wherein ARUP was in attendance and the meeting was conducted by ANURADHA. At this meeting ARUP suggested that the group should come clean with the authorities and tell them everything. ARUP was silenced and placed in a corner. She was told that she had to learn the party line.

KNAPP said that he also learned that during the initial stages of the investigation there was a woman by the name of PRATIMA to whom people were coming and confessing. PRATIMA was confused and did not know what to do with the stories which were related to her. One of the confessions related to SHEELA, KNAPP and VIDYA having travelled to London in an effort to obtain false English passports. They went to graveyards to obtain names and made passport applications based on these names.

Apparently the person who confessed to PRATIMA was an English citizen who apparently was persuaded to vouch for the false identities so that the passport could be obtained. KNAPP advised that in England, besides presenting the identification for the passport, which could include birth certificates, the person applying for the passport has to have a British citizen vouch for their identity. KNAPP said that SHEELA received a false passport and he knows that he applied for a passport using the name STEVEN TRACY. KNAPP heard that this passport was sent to ZURICH, however, he never received it.

KNAPP said that he is confident that this information given to PRATIMA was never passed on to law enforcement officials.

KNAPP also said that regarding BHAGWAN's news conference which occurred immediately after SHEELA and her group departed Rajneeshpuram, BHAGWAN was aware of all the crimes, not because he discovered them after the departure of the group, but because SHEELA kept him advised of what was going on all along. KNAPP also related a conversation he had with

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NIREN on October 13, 1985, at NIREN's office at Rajneeshpuram. At that time KNAPP was present with his girlfriend DIANE. NIREN told them to be honest with their attorneys and tell them the whole story. He said they could not get a good defense unless they did so. NIREN told KNAPP that he understood he would not get immunity. He also said he hated to see him go on his own. NIREN told KNAPP that he wanted him to drop his attorney, DES CONNELL. NIREN informed KNAPP that he did not think DES CONNELL would be cooperative with the commune and they needed a cooperative defense.

At that time, NIREN referred to other Sannyasins who had apparently said they were going to tell the truth about the fact that they were involved in sham marriages just to stay residents of the United States. NIREN said that he did not know of any person at Rajneeshpuram who fit that category. He knew that all people at Rajneeshpuram had married for love. NIREN told KNAPP that he did know of people who processed their INS documents in other offices besides Portland and may even have falsified certain information concerning themselves on INS documents. NIREN said that he felt that this matter could be successfully defended due to the fact that the reason people did that was because of the bias and prejudice on the part of INS officials at Portland.

KNAPP said that he took this to be that NIREN was telling him not to admit that his own marriage was sham.

KNAPP also said that NIREN told him that many people at the commune would eventually have to testify before a Federal Grand Jury and be asked about immigration matters.

NIREN also continued to say that he would be able to find a much more suitable attorney than DES CONNELL. He was also informed that if he obtained another attorney that these would be paid to the attorney by the legal defense fund at the commune.

KNAPP also said that attorney RONALD HOVET told his sister KAVIDO that it would be in the best interest of the commune for her to "take her lumps" and not seek immunity. However, HOVET told her that if she was interested in her own self interests she could seek outside counsel. KNAPP said that this conversation with HOVET upset his sister so much that she cried for three hours after the conversation.

KNAPP informed that he is willing to testify concerning everything pertaining to crimes committed by Sannyasins.

The following information was obtained through interview and observation:

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Name	DAVID BERRY KNAPP
Alias	SWAMI KRISHNA DEVA, and K.D.
Race	White
Sex	Male
Date of Birth	[REDACTED]
Place of Birth	Chicago, Illinois
Height	6'2"
Weight	180 pounds
Hair	Black
Eyes	Blue
Social Security Account Number	[REDACTED]
Oregon Driver's License	[REDACTED]
Parents	WILLIAM and RUTH KNAPP, [REDACTED] Chicago, Illinois; office phone [REDACTED] Winter home address: [REDACTED] [REDACTED] California; telephone [REDACTED]
Brothers	CHARLES KNAPP, MICHAEL KNAPP
Sister	CATHY KNAPP, AKA, MA PREM KAVIDO
Prior Arrest Record	None
Military Service	None
Education	B.S., Business Administration, University of Southern California, 1971; Master of Arts, Counseling, Lone Mountain College.