

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, ss.

PROBATE AND FAMILY COURT  
DOCKET NO: 07D-0542-DV1

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DAVID BURTON MANUEL, JR.,  
Plaintiff

v.

BARBARA BIDWELL MANUEL,  
Defendant

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**AFFIDAVIT OF DAVID B. MANUEL, JR., IN OPPOSITION TO THE MOTION OF  
DEFENDANT BARBARA MANUEL FOR A PROTECTIVE ORDER CONCERNING  
CERTAIN QUESTIONS WHICH MIGHT BE ASKED OF HER AT HER DEPOSITION**

First being duly sworn, the undersigned hereby deposes and says:

1. My name is David B. Manuel, Jr., and I am the plaintiff in this divorce proceeding.
2. I am submitting this affidavit to the Court to oppose the motion filed by my wife which seeks to foreclose me from asking certain questions when her deposition is taken.
3. In this affidavit, I will explain to the Court why asking questions of this nature is critical to the proof of my case.
4. My wife, in lengthy footnotes to her original financial statement, and ever since, has portrayed the Community of Jesus in Orleans as a normal, healthy, traditional church.
4. My wife is not telling the truth.
5. The fact is that those in authority at the Community of Jesus were directly responsible for the destruction of marriage to Barbara.
6. Accordingly, I am left with no option but to demonstrate that Community of Jesus

is a full-blown cult in the darkest sense of that word.

7. Dozens of newspaper and magazine articles, and over a thousand postings on “Factnet.org,” an Internet bulletin-board resource for those coming out of “enclosed societies” (cults), corroborate my characterization of the Community of Jesus as a cult.
8. In this affidavit, I will describe just our own, firsthand experience with the Community of Jesus.
9. Like most cults, the Community of Jesus rests on two foundational principles.
10. The first and always foremost principle is absolute obedience to the ultimate authority. We sincerely believed that the Founders and Directors (and now the Prioress) spoke for God.
11. Anyone who questioned that the Founders and Directors (and now the Prioress) spoke for God, was quickly helped, or perhaps intimidated, by their “light group” to see the “light.”
12. Other organizations might call them accountability groups or peer groups, but whatever they are called, groups of this nature are an effective means of coercion.
13. In the case of the Community of Jesus, eight or ten of one’s equals concentrate for an hour or two on helping the recalcitrant one see the error of his or her ways.
14. If there is not a breakthrough, *i.e.*, if the person being “helped” does not break down and confess their sin and beg the others to forgive them and reinstate them, then the group reconvenes the next night to resume the process. This continues night after night until the person admits the error of their ways.

15. If that didn't work, then we would meet with the Mothers, who were experts at instilling fear, and systematically disemboweling whatever might be left of one's self-esteem.
16. The most coercive measure of all was the dreaded DVM25 announcement: "All double-vowed members 25 and above, are to report to the chapel immediately!"
17. Once assembled, the entire adult community gathered to take turns trying to help someone see the sin they were stuck in, to which they were presumably blind, though the perceived sin was perfectly obvious to everyone else.
18. I was the subject of more than one DVM25.
19. If the subject did not break under the pressure, and none of the techniques employed by the group worked, then they would be sent to live with the religious sisters or brothers for a season (usually several months), where they were given the most menial tasks, to break their "proud" spirit.
20. It should be emphasized that we all bought into this as being part of God's will for us.
21. We deplored resistance to Community of Jesus authority when we saw it in others, and were fearful of resistance ever cropping up in our own lives.
22. When a decision came down from the Mothers (as Cay Andersen and Judy Sorensen, the founders, preferred to be called as a sign of respect), no matter how seemingly bizarre or off the wall or even wrong it might feel, it was to be regarded as if it came down from God Himself, and acted upon immediately.
23. If we had a problem with it, we were to take it to God, and if that didn't work, we were to tell our light group at the next weekly meeting.

24. As I write this, it sounds like another Jonestown, but it was not.
25. Most members of the Community of Jesus had been successful in the world – doctors, lawyers, business executives, editors, teachers, administrators, and the like.
26. More than a few members had come to the Community with considerable independent means, and nearly all were well educated (at one point there were five doctorates from Harvard).
27. The obvious question is how could so many smart people be so taken in?
28. The great seduction of the Community of Jesus was spiritual pride, the desire to be right – more right than any other group.
29. Though we seldom spoke of it, we thought of ourselves as God’s elite, His Delta Force, the best of the best.
30. No other group had sacrificed as much as we had, nor could pray as well as we could.
31. None lived in the light with one another, as we did.
32. None had our discernment, our wisdom *et cetera*.
33. Moreover, we had the best liturgy, the best choir, a basilica that rivaled any in Florence or Rome, the best organ (with three musicians with doctorates from Eastman to play it).
34. The best, the best, the best. . . . our motto was “Excellence to the Glory of God” (and we didn’t mind if a little of that glory rubbed off on ourselves).
35. The second foundational principle of the Community of Jesus was that you could not trust your own ability to hear God’s guidance for yourself.
36. The basis for this principle was the belief that what you thought was God’s for your life might be contaminated by your own will or ego or intellect or desires – even by

your opinions.

37. The only way to be certain that you were hearing God's will for your life was to trust the group to decide that for you.
38. Each light group was a careful reflection of the mind of the Founders or the Prioress, who received reports of what went on in each light group.
39. Absolute obedience and absolute trust was the core – Lord Acton had something to say about that: “Power tends to corrupt, and absolute power corrupts absolutely.”
40. The Community of Jesus is quick to claim that while there may have been certain dark areas under the Mothers, things have lightened up considerably under Mother Betty's leadership, but it is not true.
41. True, fear is no longer the coercive measure that keeps everyone in line – at least, not abject terror.
42. There is still fear, however, though it is more subtle.
43. The main fear is of displeasing Mother Betty, because once you get on her disapproved-of list, you never get off of it.
44. For example, none of the aforementioned five organists who had once concertized around the country, were playing that magnificent organ when I left; Mother Betty thought there was too much ego in each of them.
45. The Community of Jesus was proud of its openness and honesty, and taught that it was freeing to admit you were wrong and confess it and be forgiven.
46. Freedom to be wrong was a the topic of a tape we listened to, many times.
47. But Mother Betty did not lead by example.
48. She herself was sometimes wrong, but no one had ever heard the nine golden words

com from her mouth: "I was wrong. I am sorry. Please, forgive me."

49. The objective of a cult is to gain control over the individual member's decision-making process as quickly as possible and then maintain it at all costs.
50. To do this, the cult must first break down the family unit, the traditional building block of society.
51. The family unit is the enemy of any cult, and at the Community of Jesus, the love that a family felt for one another was called idolatry, the theory being that any relationship which did not have Christ at its center, was an idol.
52. "Family idolatry" was anathema, loathed by all.
53. I can remember one retreat for Community members, when the Mothers took it upon themselves to destroy my love for my parents.
54. For two hours they mocked and ridiculed everything that we had ever done together.
55. Finally, I broke down and sobbing, said, "I can't hate my parents! I love them!"
56. At which point the Mothers, perhaps realizing how that might sound, backed off.
57. But they had made a tape of that session (there were speakers and cameras everywhere, so they could keep track of us), and they gave me a copy, instructing me to listen to it every day, so I could see who I was. And in case anyone thinks I am exaggerating, I still have that tape.
58. If a family arrived at Rock Harbor together, the children over nine were separated from their parents and put in different households, to be raised by the adults there.
59. The theory was that while we might have excellent discernment where other people's children were concerned, we were blind to our own children's sins.
60. When the outside world got wind of this, there was such an outcry that the

Community of Jesus quickly back-pedaled away from that policy, not separating children until they had reached their teens.

61. Our daughter Blair was 13, when she was taken from us and put in another home.
62. All of this was done with the parents' approval.
63. If it came from the Mothers, it must be all right.
64. There was zero tolerance for dissension, and private discussion among newly-arrived parents was discouraged.
65. If you needed to talk, you got the older, wiser members of your household to help you: "If you two ever get into anything, even late at night, don't try to handle it alone. Just wake us up, and we'll come help you."
66. Inevitably one would be more resistant to the Community way than the other, and the other members or the household would side against the resistant one.
67. In this way, husbands and wives were turned against one another and re-patterned to think of their spouses as just other members of the Community.
68. I learned to agree with Barbara quickly.
69. Otherwise she would make a phone call, and before I knew it, I would have half the Body of Christ in my living room, to help me see where I was wrong.
70. Sometimes, it didn't even take a phone call.
71. I would come home and find our light group assembled on our sun-porch – a surprise party for my benefit.
72. There were other ways to break the bond of love between a husband and wife, which was at the heart of each family unit.
73. When we first moved to the Community of Jesus in the summer of 1971, Blair was

four, and we were trying to have another child.

74. The Mothers gave us their wholehearted approval.
75. But then Barbara, who had been acting director of admissions at Finch College when I married her, started working for Mother Judy, as her executive secretary. She was very good at her job. (Too good.)
76. The Community of Jesus is a matriarchal society.
77. The leadership has always been women.
78. The Founders ruled for twenty years.
79. When Mother Cay died in 1989, Mother Betty joined Mother Judy, who soon retired.
80. Then Mother Betty carried on as Prioress, and has just been re-elected for another 4-year term, which means she will have been in office for the Community of Jesus's second twenty years.
81. All positions of responsibility have always been held by women; even so, the Mothers still felt the men were passively resisting their leadership.
82. In 1972, Mother Judy led a weekend retreat for the Community men. (Mother Cay was bedridden at the time and may not have been party to what happened.)
83. On the evening of the second day, after all of us had ceremonially kicked one of our members in the derriere, Mother Judy called five men to accompany her up to the chapel. There in the semi-darkness, with the only light coming from behind a stained glass dove in the ceiling above the altar, she informed us that God had told her she was to lead the five of us in a vow of celibacy.
84. While the Bible does condone a voluntary, mutually accepted abstinence from conjugal relations for a season, to purify oneself, it is to be a brief season, after

which the husband and wife are to come together again.

85. Nowhere does the Bible advocate permanent celibacy, and nowhere is it mandatory, something that can be imposed on someone else.
86. That night Mother Judy was leading us in a final vow, and it was not optional.
87. The husbands were not given any opportunity to talk it over with our wives.
88. We either took the vow or would be in blatant rebellion.
89. Two of the five men were the Mothers' husbands, Bill Andersen and Bill Sorensen (who were already practicing celibacy).
90. Also present was Mother Judy's son John (who later left the Community of Jesus, married, and had children), Rick Pugsley (Mother Betty's husband), and me.
91. I desperately did not want to do this, but was more afraid of being out of God's will.
92. Against my will, I took the vow.
93. When I got home that night and told Barbara, we both wept.
94. We had wanted another child so badly.
95. In tears, we made love one more time that night – and never touched each other again.
96. Our marriage ended that night.
97. From then on, we lived essentially as brother and sister.
98. As Barbara once put it, after that she married the Community and I married my dreams.
99. There is a footnote to this episode. When we joined the Community in 1971, the Community of Jesus had a policy regarding the absolute abstinence regarding alcohol.

100. Just prior to leaving Princeton to move to the Cape, we gave away wedding presents like a set of Steuben brandy snifters and wine glasses.
101. But six years later, while spending the winter in Cambridge, England, where our choir was rehearsing under the choirmaster of St. John's College, the Mothers developed a taste for English beer.
102. When they came home, the Community policy was still abstinence, but in the privacy of the Mothers' living quarters, they and a few of the most trusted inner circle would frequently get together for beer or wine.
103. One evening, after we'd had a few beers, I asked Mother Judy about the celibacy vow.
104. She laughed and said, "You don't think I was about to lose the best secretary I'd ever had, just so she could go home and take care of a baby, do you?"
105. She obviously expected me to laugh with her, but I couldn't.
106. I was stunned and then enraged.
107. However, I said nothing, for fear of being excommunicated from the inner circle.
108. When I left the Community in January of 2005, ten married couples were not sleeping under the same roof, and since then, I have learned that other couples were coerced into taking similar vows of celibacy.
109. There is a bitter irony here, in that these cult leaders do not practice what they preach.
110. The Mothers themselves did not practice celibacy where they themselves were concerned.
111. There had long been rumors outside the Community that theirs was a lesbian

relationship.

112. The members, including the inner circle, simply chose not to believe it, though we could see there was only one king-size bed in their living quarters.
113. We continued to choose not to believe it, even after Mother Cay's son Peter confirmed it on Boston television's Channel 5 program, "Chronicle."
114. Shortly before I left, however, Barbara told me that it was true.
115. To break their co-dependent lesbian relationship, Mother Judy had been sent over to the Sisters of Mary community in Darmstadt, Germany, in 1969. There, she scrubbed toilets and did other menial jobs for the better part of a year.
116. The "treatment," however, did not take.
117. When Mother Judy was reunited with Mother Cay, their relationship resumed as it had been, before their force separation.
118. Peter Andersen (Mother Cay's son) has since revealed in intimate detail the nature of their relationship on Factnet.org, which is there for anyone to see.
119. Another person in that circle who was not practicing celibacy was Rick Pugsley, who was director of music at that time.
120. It came to Barbara's and my attention that sometime in the 1990's he had used his position to make sexual advances towards some of the young men to whom he was giving voice lessons.
121. In typical cult fashion, the Community of Jesus keeps its dirty secrets secret.
122. We would never have known about it, except that we were named as codefendants in a sexual harassment lawsuit, brought by [REDACTED].
123. Unbeknownst to me, my wife and I were apparently on the Community of Jesus's

board of directors at the time of the incidents, and so were named along with the others.

124. To the Community's and our great relief, the case was settled out of court for \$187,000.

125. At the time, Barbara told me that Rick had been involved in a similar case, with [REDACTED].

125. That case was also settled out of court for a payment \$30,000 a year for ten years.

126. Rick is over in Cambridge, England, now on a stipend, "doing research" and not coming home.

127. Another way to break down the family unit, and reinforce the notion of the Founders' or Prioress's absolute control over us, was to move people suddenly and without warning from their homes.

128. It didn't matter if you owned your own home, as most of us did.

129. There were 36 households when I left, each with at least two or three families in them.

130. They paid a ridiculously low monthly rent of \$100-150 per tenant, though we were instructed never to refer to it in those terms; it was to be portrayed as a strictly voluntary contribution towards household expenses.

131. No one was impervious to the "Angel of Move," as I jokingly named it.

132. We might have lived there for a year or two or longer, might have put down roots and made close friends with the other families in our household.

133. The call could still come: "The Manuel family is moving to the Ark. Have this move completed by supper-time."

134. Perhaps because wherever we were, we made life cozy for everyone, we were moved nine times in our first five years in the Community.
135. I was so angry, I joked to Barbara, “Why don’t we just sell the house and shoot the dog?”
136. It wasn’t so funny, when I had to do essentially that. Our dog Pepper didn’t understand the moves. She would come looking for us, each time she got out of the house. And she became incontinent, I think because nobody living in our house would take her for a walk in the morning and evening, as I used to do. Finally I was told that her messes were unsanitary, and I would have to put her down. I did. And she never took her eyes off me, all the way to the vet’s. It was as if she was telling me that she understood, and it was all right. But I didn’t understand (and still don’t), and it’s not all right.
137. If a person had strong ties to their parents or other family on the outside, you were encouraged to do whatever it took to break those ties – unless, of course, you stood to inherit a significant amount.
138. The Community was quite attuned to what inheritance each person might come into, since they were in line for a tithe of it, or much more.
139. I’m not going into our personal finances here, except to say that I strongly disagree with the portrait Barbara has painted, and have the facts and figures to prove it.
140. This part is simply to show the Community of Jesus’s attitude towards its members’ money.
141. In the mid-80’s, Barbara was making \$35,000 a year as the Community’s office administrator, which back then was a good salary.

142. They named her a member of the finance committee.
143. Since others on that committee were working for no salary, Barbara immediately gave up hers – as the Community had anticipated she would.
144. She did this without informing me, until after it was done.
145. Instantly, we were quadruple tithing.
146. Others with far deeper pockets were similarly pressured.
147. When I left, the basilica had cost \$23 million, and the meter was still running.
148. Though we did our utmost to attract money through various capital campaigns, nearly all of that money came from the members themselves.
149. If your parents were wealthy and reasonably positive towards the Community, then they would be in a special category.
150. A perfect example was my father-in-law.
151. As former Chairman of the New York Stock Exchange, his name was valuable to the Community of Jesus as a reference.
152. They were kind to him, but he never warmed up to the place.
153. On his 75th birthday, he told me, and I told Barbara, that the one thing he regretted happening, was that his seat on the NYSE, which was then worth about a million dollars would be split between Barbara and her brother.
154. He knew Barbara would tithe her half, which meant “that place” would get around \$50,000 of his hard-earned money.
155. My parents were not viewed in that category, which was why they were torn down and I was shamed for loving them.
156. My sister, also a member of the Community of Jesus, was very close to our mother.

157. She was coerced into writing her mother a handwritten, several-page letter, basically accusing her of every mother-daughter crime in the book.
158. Shortly before my dad died in 1989, he told me that in all my mother's life, nothing had ever hurt her as much as that letter.
159. How I came to leave is the last thing I'll cover here. I
160. In 1995, I nearly died of kidney cancer. When I got home from the hospital, I knew my life had been extended for a purpose, and I felt that I could commune with God in my heart.
161. I started changing then, radically. I began reading the Bible – and discovered that our Community was not Bible-centered, as I had always assumed it was.
162. For instance, nowhere in the Bible does it teach that the end justifies the means; on the contrary, Jesus' entire life was a repudiation of that concept.
163. To Him, no end, no matter how noble or desirable, justified employing unholy means.
164. In the summer of 2004, I went to Mother Betty and asked to be excused from participation in light groups.
165. I had lost all taste for them, seeing them as brutal instruments of coercion.
166. I made it clear that I was prepared to leave the Community, if she did not release me from this obligation.
167. But Mother Betty is a very persuasive woman, and she persuaded me to stay in them and just listen.
168. In the fall of 2004, we started marathon light sessions for a 73-year-old grandmother who needed to be broken.

169. It was no easy task; we had eight light sessions in five days.
170. Finally we went up to Mother Betty's private quarters.
171. There, as the others lit into the targeted grandmother once again, I whispered to Mother Betty, "How do we justify this in Scripture?"
172. Shaking her head, she whispered back, "When we took our final vows, we gave each other permission to do whatever it took to bring us back into the light."
173. Finally, in January of 2005, I could stand it no longer, and I left.
174. I left in a way I am now ashamed of.
175. I did not go to speak to the Prioress first, because she had persuaded me to stay the year before, and I was afraid she might again.
176. When I told Barbara and then our daughter, that I was leaving the Community, I said that I believed I was following God.
177. I knew that everyone would say I was on a massive ego trip.
178. If that was true, I said, I expected to crash and burn quickly, and would come home with my tail between my legs, saying "There's no fool like an old fool."
179. If, on the other hand, this was what God wanted me to do, then I expected Him to open doors for me and favor all my undertakings. By the grace of God, He has.
180. I'm now helping many people and making up for all the years I could have been serving Him.
181. Exit counselors who specialize in helping those coming out of cults, including some who have counseled ex-Community of Jesus members, tell me that I am a remarkable case.
182. Most persons who leave are so severely crippled they have a difficult time making

a new life for themselves, and some simply can't cope at all – “shipwrecks by the side of the road,” was what one counselor called them.

183. Though I had left, I did not give up pursuing how Barbara and I might yet make our marriage work.
184. I asked her to come away with me for a season, because every time we were away from the Community for any length of time, just the two of us together, we were happy.
185. Our two-week trip to the Serengeti to celebrate her sixtieth birthday was the happiest time of our married lives.
186. I sensed it was because we were out from under the control of the Community of Jesus, but she said the reason we were enjoying ourselves because we didn't have the responsibilities we had at home.
187. Anyway, I said to her that we could live anywhere she chose, and she could commute to her work every day, just so long as we were alone, the rest of the time.
188. She deemed that Unacceptable.
189. I made an alternative proposal: I would move back to our house, and we could work on our marriage there.
190. All I asked was that the other families living in our house find lodgings elsewhere, and that no Community of Jesus activities would take place in our house.
191. She said we couldn't do that; we'd given our house to the Community.
192. No, I said, we had given it to God – and since He had given it to us in the first place, I was confident He would lend it back to us, long enough to repair our marriage. She said no.

193. I said that I would go to any marital counselor of her choosing, as long as he or she was a professional and in no way associated with the Community of Jesus. Unacceptable.
194. She countered with the suggestion of going to Father Lane, a retired Episcopal priest and a good friend.
195. But Father Lane was in his eighties and on staff at the Community of Jesus.
196. All Community of Jesus counselors had a special arrangement to report anything significant to the Prioress, and I didn't want Mother Betty's input, however indirectly.
197. In the summer of 2006 Barbara and I met for lunch for the last time. I stated again that I could never go back under the rule of the Community. She said it was obvious that I was happy doing what I was doing, and she was where she felt she was supposed to be. And that was how we left it. Except she would not buy my half of the house from me, nor would she sell her half to me.
198. I finally sought a legal separation, still hoping for reconciliation, because it was the only way to get what was rightfully mine.
199. Here are six other husbands who have had to divorce their wives, because the wife refused to leave the Community of Jesus.
  1. Ted Rose who is a hospital administrator (early 1970's);
  2. George Norman, a west Texas rancher and realtor (late 1970's);
  3. Herrick Jackson, a newspaper heir (early 1980's).
  4. Bob Murray, a Washington consultant and former Undersecretary of the Navy (mid 1980's),

5. Father Al Haig, Anglican priest and former headmaster of Grenville Christian College (mid 1990's); and
6. Jack Schmidt, comptroller (2007).

200. These men are all personal friends of mine, and I am confident they will give strong corroborating testimony when deposed.

201. Thirty-seven years ago, when we joined the Community, the Charismatic Renewal was gathering momentum and other residential communities were flourishing.

202. Most of them were Catholic – the Word of God in Ann Arbor, the People of Praise in South Bend, the Mother of God in Gaithersburg, and the one at Steubenville, associated with the university there.

203. But power does tend to corrupt, and all of these communities exploded at around the same time.

204. When we read of the horror stories that came to light, we shuddered -- not because we were appalled, but because their cult-like excesses were exactly the same as ours.

205. The one great difference was that in all their cases, somewhere there was a bishop to appeal to, or to blow a whistle to.

206. The only reason the Community of Jesus survived – and still survives – is because there is no higher authority to whom one can appeal.

207. Not that the Community of Jesus didn't try to gain a covering.

208. First, they approached the Episcopal bishop in Boston, John Coburn, who had presided at the expansion of the chapel, but he had heard the rumors about the place and declined the "honor."

209. The Community of Jesus then made overtures to Catholic Bishop Sean O'Malley of

Fall River, but he, too, had heard the rumors and declined. Barbara herself told me of these things.

210. Finally, like a weed, a cult needs to grow and replicate itself, wherever possible.
211. At the moment, there is a million-dollar class-action lawsuit being brought against Grenville Christian College, a boarding school up in Ontario that owes its lifestyle and foundational principles to the Community of Jesus.
212. The Community of Jesus is now rapidly trying to distance itself from the school, claiming that there is not and never has been any connection between the two.
213. In truth, there was the closest possible relationship between the two. I should know -- I brought the principals together.
214. In the spring of 1972, when I was editor of Logos, I met Al and Mary Haig and learned of their school.
215. There were having great problems with their staff.
216. Since at the Community of Jesus our lifestyle was the answer for everyone, I naively believed, I invited Al to the Cape for a visit.
217. Soon the Mothers offered to send a light squad up to Grenville, to show them how to do it the Community way.
218. The offer was accepted, and Grenville began to pattern itself after the Community.
219. It went so far that many of the staff became vowed members of the Community of Jesus, regarding the Mothers and then the Prioress as their highest authority.
220. For awhile it worked, just as it did on the Cape.
221. But when it turned inward and dark, there was no one to turn to for help.
223. The postings on Factnet.org, especially those from two years ago, when the bulletin

board was brand new and ex-members of the Community of Jesus were first discovering it, are gut-wrenching and will break any reader's heart.

224. Exposing a cult is a difficult thing. I have put it off until now, because I have loved ones in there and many close friends, and they will all be hurt, some irreparably. I would have preferred to put it off indefinitely, and not go public with any of this, but Barbara's motion to suppress my freedom to question her about utterly relevant aspects of our marriage and its destruction, have made that impossible.

225. I urge the Court to allow me to, through counsel, inquire freely into the areas of our marriage that Barbara, through her motion, seeks to hide.

Subscribed and sworn to under the pains and penalties of perjury this fourteenth day of November, 2008.

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DAVID B. MANUEL, JR.