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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 52

HON. JOSEPH L. CALL, JUDGE

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

NO. A 267861

STEVE GROGAN,

Defendant.

WATKINS

REPORTERS' DAILY TRANSCRIPT

Thursday, August 12, 1971

APPEARANCES:

(See Volume 1)

VOLUME 32:

Pages 4201 - 4357 incl.

Reported by:

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-and-
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Official Reporters

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1 PEOPLE v. STEVE GROGAN
2 NO. A-267861

VOLUME 32 - Pgs. 4201 - 4357 incl.
Thursday, August 12, 1971

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4 I N D E X

5
6 PEOPLE'S WITNESS

CROSS

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7 WATKINS, Paul (Cont'd.)
8 (Cont'd.)

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16 E X H I B I T S

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18 DEFENDANT'S EXHIBITS

FOR IDENT.

19 B - 8x10 black and white photo

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1 LOS ANGELES, CALIFORNIA, THURSDAY, AUGUST 12, 1971

2 9:35 A.M.

3
4 THE COURT: Now, we will proceed. People against Grogan.
5 Defendant is here. Counsel are here.

6 And Sheriff, you can bring in the jury.

7 THE BAILIFF: Yes, sir.

8
9 PAUL WATKINS,

10 resumed the stand and testified further as follows:

11 THE COURT: Mr. Watkins, you have been sworn. Be seated
12 and state your name again, please.

13 THE WITNESS: Paul Watkins.

14 THE COURT: Thank you.

15 And pull your chair right up so you can talk into
16 the phone there. That's it.

17 You can move this if you want to. Adjust it a
18 little bit there. Excuse me.

19 (The following proceedings were had
20 in open court in the presence of the
21 jury:)

22 THE COURT: Now we have all 12 of the regular jurors
23 here plus the 3 alternates.

24 So you were cross-examining. You may proceed.

25
26 CROSS-EXAMINATION (Continued)

27 BY MR. WEEDMAN:

28 Q Mr. Watkins, we left off last night talking about

1 the length of time these various group trips on acid would
2 last.

3 And I believe you said that it would vary. Can
4 you give us some idea in time, though, as to what we are
5 talking about?

6 In other words, would it last half an hour or an
7 hour or a whole day or what?

8 A All night. It would last all night. We generally
9 take it in the evening, and it would -- we would still be on
10 when the sun came up.

11 Q And what happened as soon as it began to wear off,
12 as I presume it did?

13 A As it began to wear off generally?

14 Q Uh-huh.

15 A Go to sleep.

16 Q Now, about the violence that you told us about
17 that would occur, the bizarre conduct, the climbing the walls
18 I think you said yesterday, was this a typical reaction or an
19 unusual reaction to the acid?

20 A It's an unusual reaction.

21 MR. KATZ: I am sorry. I didn't hear the answer.

22 THE WITNESS: It's an unusual reaction.

23 Q BY MR. WEEDMAN: Out of the some 30 to 40 trips
24 that you went on with the family, how many of those involve
25 this unusual, violent, bizarre climbing-the-walls behavior?

26 A I recall one where it was very, very, very
27 extreme.

28 And then I recall five of -- five to ten of
degrees less extreme.

#2

1 Q In time were these fairly well distributed amongst
2 the thirty to forty trips, or did they occur in the beginning
3 or at the end?

4 A They occurred with different individuals. Lots of
5 times just one person would go through it and then other
6 people wouldn't; other people would remain in control.

7 Q What would the reaction be of those persons who
8 appeared to remain in control towards the person who was out
9 of control?

10 A Reaction?

11 Q Yes.

12 A Generally, as far as my own reaction went, I would
13 generally just let them go, unless they would get to the point
14 to where they were tearing themselves up, tearing their bodies
15 up really bad, and then I would want to stop them.

16 Q During these trips would everyone remain together?
17 By that I mean, if, for example, a trip occurred inside a
18 house, would any of the people participating leave the house
19 while this was going on?

20 A They may try, but they wouldn't.

21 Q What do you mean they would try?

22 A Well, like some trips I can recall, girls would
23 jump up and decide they were going to leave -- a girl or two--
24 and she just couldn't do it.

25 Q You mean physically was unable to?

26 A Physically was stopped.

27 Q I see. Was there any particular reason for that?

28 A Yeah; so that they wouldn't go out and flip out in

1 the street somewhere and the police would come in and arrest
2 the whole bunch of us.

3 Q So would it be fair to describe, then, the reaction
4 of people who were in control as protective towards those
5 people who were having a bad trip?

6 A Well, that -- we are talking generally now --
7 everyone has different reactions to everything, so we can't
8 really put it into a package and tie it up.

9 Q All right. That is the trouble with questioning,
10 because we tend to generalize too much, and I don't want you
11 to generalize. It is not appropriate to generalize.

12 A It is not a thing that you can generalize on.

13 Q Were there ever any times, for example, when
14 persons obviously reacting aggressively as the result of taking
15 LSD, left the group and went off to parts unknown?

16 A Yes.

17 Q Can you tell us when and perhaps where that was?

18 A I can remember once where Sandy -- we went on a
19 trip to the Fountains of the World one time, and Sandy ran off
20 into the hills. She was trying to kill herself. I ran off
21 after her trying to catch her and wound up stopping her,
22 taking away her knife and razor blade and things.

23 THE COURT: Where was the family located at that time?

24 THE WITNESS: At the Spahn Ranch.

25 THE COURT: What was the date of this incident?
26 Approximately?

27 THE WITNESS: October '68.

28 THE COURT: What?

1 THE WITNESS: October of '68.

2 THE COURT: Thank you.

3 Q BY MR. WEEDMAN: Were there ever any other times
4 when members of the family would leave the group during a trip?

5 A Yes.

6 Q Can you give us another example?

7 A I can remember once when Charlie left the group,
8 took off; just all of a sudden got up and ran out the door.

9 Q Do you know how far he got?

10 A I was told he got quite a few miles. He stayed
11 away for about a day and a half.

12 Q How about other members of the family? Did any of
13 them leave, such as Charlie and such as Sandy?

14 A Yes. I can remember once where Brooks went running
15 off down the road. But generally, as far as that went, when
16 we were coming on to acid and was really the strongest, when
17 we were really under the influence really strong, no one was
18 allowed to leave to go anywhere. If there was any fear that
19 they would go outside and flip out and then bring the heat on
20 us, the rest of the people in the house, they just wouldn't
21 let them out.

22 Q I see. So I take it by heat you mean the police?

23 A Yes.

24 Q So that I take it, then, it would be fair to say
25 that the tendency, if not almost invariably the rule, would be
26 to keep people together so that they wouldn't create trouble
27 by leaving?

28 A Uh-huh.

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1 Q Are there any other times that you know of, other
2 than those three now that you have told us about, where
3 people left during a trip? You mentioned Charlie and Sandy
4 and Bruce Davis.

5 Were there any other times when persons -- I am
6 sorry. Did you say Poston?

7 A I said Brooks Poston.

8 Q I am sorry. I misunderstood you.

9 Then Charlie and Sandy and Brooks Poston then
10 leaving during a trip. Do you recall any other times when
11 persons left?

12 A Not on the basis of a fleeing type running away.

13 Lot of times, you know, someone would leave to go
14 do something under orders, more or less.

15 You know, "Go over there and do that."

16 Then they would go over and do something because
17 someone told them to.

18 Q This is under the influence of LSD?

19 A Yeah.

20 Q Would the person telling them "Go do something"
21 would that person also be under the influence of LSD?

22 A Yeah.

23 Q I would like to move ahead now to the time when
24 apparently you became disenchanted with the family. You felt,
25 as I understand your testimony of yesterday, you felt that you
26 were not enjoying the kind of life with the family that you
27 had been previously.

28 Now, would you tell us again what it was perhaps

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1 in some more detail that altered the family life?

2 You mentioned helter-skelter, and you mentioned
3 the family becoming revolutionary, I believe.

4 Would you amplify on that for us.

5 A All right. I mentioned -- as I mentioned on about
6 New Year's --

7 THE COURT: Of what year?

8 THE WITNESS: Of 1968.

9 THE COURT: All right.

10 THE WITNESS: And '69. The New Year's there.

11 Charlie came out from Los Angeles, and he was
12 talking about this Beatle album that he had heard, this record
13 by the Beatles.

14 And I had heard it a month or so before, or just
15 a few weeks before.

16 And he was saying, "Are you up to what the Beatles
17 are saying? They are saying this and that and the other. And
18 they are prophesizing a revolution." And as the days went by
19 the picture grew and there was more to it and more to it.

20 And we lived in it. And then pretty soon the whole
21 thing was called helter-skelter. And pretty soon helter-
22 skelter became our life.

23 It became -- what we lived for was helter-skelter
24 and by we -- or me, I know the atmosphere was that way with
25 me, and it was with others.

26 And I would look out the window of the house and
27 be expecting it to happen any minute. Expect the people to
28 start shooting each other and start killing each other in the

1 streets, and civil war breaking out there any second.

2 THE COURT: Where were you living at the very time?

3 THE WITNESS: The time I am speaking of is at the
4 Gresham Street house, was when it really got quite intense.
5 We really started working on helter-skelter.

6 Q BY MR. WEEDMAN: And did helter-skelter include
7 the family's reaction to the violence as, for example, plans
8 to move to the desert?

9 A Yes.

10 Q So helter-skelter then you are indicating was a
11 rather broad term to include the revolution that you
12 anticipated and the family's plans in connection with that --

13 A Yes.

14 Q -- revolution?

15 A Yes.

16 Q And helter-skelter was a phrase that was in the
17 Beatles' song then, I take it?

18 A Yes.

19 Q And to Charlie, Charles Manson then, this had
20 some special significance which escaped you until Charlie
21 persuaded you that that significance was there?

22 A Yeah.

23 Q Most of the members of the family go along with
24 Charles Manson and his predictions about -- and plans for
25 helter-skelter?

26 A Yes.

27 Q Was helter-skelter -- was at least the revolution,
28 at least in Charlie's terms, one in which the black man was

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1 going to rise up against the white man?

2 A Yes.

3 Q And was this because the black man had been
4 oppressed and that he was reacting to the oppression by the
5 white man?

6 A Oppressed?

7 Q Yes.

8 A Yeah, it was for that reason and it was also --

9 Q I am sorry.

10 A -- supposedly as I understood the way Charlie said
11 it, it was because that the black man was the white man's
12 servant, as the way it should be.

13 And it is the way Charlie said it, that the Negro
14 would -- was going to clean up the mess that the white man
15 made, which would be this entire society.

16 And he was going to clean it up by just virtually
17 destroying it.

18 Q Well, when Charles Manson said that the black man
19 was the white man's servant, did he mean that literally, or
20 did he mean that in the sense, as you gathered, did he mean
21 that in the sense -- in a poetic sense?

22 In other words, that the black man was going to
23 clean up after the white man? That is to say, the social mess?

24 MR. KATZ: Excuse me, your Honor. I will object on the
25 grounds that it is totally ambiguous and confusing.

26 THE COURT: I think it is somewhat argumentative and
27 conclusional. I will sustain the objection.

28 MR. WEEDMAN: Well -- very well, your Honor.

1 MR. KATZ: If he wants to ask the witness what helter-
2 skelter is and have a detailed answer, I have no objection.

3 THE COURT: Sustain the objection. Sustained.
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1 Q BY MR. WEEDMAN: What was the prediction, appar-
2 ently, of Charlie Manson about the revolution? What form was
3 it going to take? What was going to happen?

4 A Okay. It was supposed to start -- well, there was
5 various ways it was going to start. It changed from time to
6 time. As we got more involved in it, we became more involved
7 in it starting. In other words, pretty soon it got down to
8 where Charlie was going to be the one that started it.

9 Q What was his prediction? What did he say was going
10 to happen between the black man and the white man?

11 A All right. At first, he said the only reason it
12 hadn't already started was that --

13 Q I'm sorry, Mr. Watkins. I'm sure we will cover
14 that, but what I want to know is what Charlie said was going
15 to happen.

16 A Was going to happen?

17 Q Yes. In other words, was the black man going to
18 suddenly begin shooting the white man, or what? That kind of
19 thing.

20 A This is what I was explaining to you.

21 Q All right, then, go ahead.

22 A That when -- when something happened so that the
23 black man would cease to be pacified by the white daughters,
24 white man's daughters, in Haight-Ashbury who supposedly -- the
25 only reason it hadn't already started was because the black--
26 man was being pacified by raping all the white girls and things
27 in Haight-Ashbury. So if all the hippies left Haight-Ashbury,
28 they were supposed to turn on the upper class suburban

1 areas to take out their frustrations, or whatever.

2 This is the way it was told to me. They were
3 supposed to be -- just start out with some very vicious murders
4 in which some Negroes from Watts would go into like the rich
5 piggy districts and just literally slaughter families of people
6 and chop the bodies up and smear blood all over things and
7 make some atrocious-looking murders happen.

8 Q What was your reaction to this prediction by
9 Charles Manson about what was going to happen?

10 I will put it this way: Did you believe, yourself,
11 that this kind of thing was going to happen?

12 A Well, doesn't every man sort of have his -- wouldn't
13 it be nice if we could believe that just after the next
14 revolution we will have peace on earth, or just after the next
15 sunset? Everyone harbors some sort of a dream that everything
16 is going to be over, you know, and we may wake up in the
17 morning and it is going to be all right.

18 This was kind of like our feeling. We wanted
19 this, and I believed it most definitely. I went for it whole
20 hog. So did everyone else who stayed with the family.

21 Q You went for the prediction that there was going
22 to be a revolution with a lot of bloodshed and so on between
23 the black man and white man?

24 A Yes.

25 Q And was the family then going to the desert largely
26 with this in mind? Was the family going to the desert to
27 escape the revolution?

28 A Well, after these murders, then the whiteys was

1 supposed to get mad and come back and just go into Watts and
2 go into all the black neighborhoods and just start shooting
3 people, start shooting blacks, and then the blacks would rise
4 up and say, "Look what you have done to my people," and that
5 would divide the whites into factions, like the hippies would
6 begin to fight with the upper class and the Chicanos would
7 fight with these and everyone would start fighting amongst
8 each other and everybody would be killing each other off.

9 Q Where would the family be?

10 A The family would go to the desert in the meantime
11 and hide in a hole.

12 THE COURT: You mean the family would hide out in the
13 desert while the fighting was going on? Is that it?

14 THE WITNESS: Yes; for fifty years.

15 THE COURT: They weren't in the battle at all?

16 THE WITNESS: Well, it changed over a period of time.
17 At first that is the way it was supposed to be. We weren't
18 supposed to be involved at all.

19 THE COURT: The family managed to keep out of the battle,
20 is that it, that was supposed to go on?

21 THE WITNESS: Well, the battle never went on but --

22 THE COURT: Well, the family wasn't in it. That is
23 what I understand from your statement. Is that correct?

24 THE WITNESS: It changed, your Honor, from time to time.
25 First we were not involved in it at all. We were supposed
26 to be the children of love.

27 THE COURT: Yes.

28 THE WITNESS: So we were not going to be involved in

1 this violence.

2 THE COURT: When did the love complex leave the family and
3 they become involved in the battle that you speak of? When
4 did that take place?

5 THE WITNESS: As the picture grew and as time went on,
6 it got so that our involvement would be more and more, like we
7 would go and get involved to the point where we would go into
8 the city and steal babies, save babies from getting killed, and
9 we would take them out to the desert.

10 Charlie would talk about this and scheme about this.

11 THE COURT: Stealing babies in the city and taking them
12 to the desert? Is that correct?

13 THE WITNESS: That is correct.

14 THE COURT: What was the purpose of that?

15 THE WITNESS: To save some white people, because the idea
16 was they were all going to get killed. The only ones that
17 would survive would be us, the family, because we would be
18 hiding and we would have known that it was happening.

19 THE COURT: Well, what were you going to do with the
20 babies you had in the desert?

21 THE WITNESS: Raise them up. We were going to raise them.

22 THE COURT: To become part of the family, you mean?

23 THE WITNESS: Yes.

24 THE COURT: Now, all the battling that is going on, who
25 was to do the battling? As I understand it, the family was
26 not in the battle at all, is that correct?

27 MR. KATZ: Excuse me. I would object on the grounds that
28 is not what the witness said.

1 THE COURT: I'm asking him. That is what I want to get.
2 That is my question.

3 Is the family in the battling or not?

4 MR. KATZ: At which point? There is an objection on the
5 ground --

6 THE COURT: I am asking the question. I am asking the
7 witness.

8 Is the family in the battling at all, or not?

9 THE WITNESS: We was involved in the battling. Later on it got
10 to be where we were going to be quite involved in the battling,
11 and this is what turned me off about the whole thing. I didn't
12 mind it as long as everybody else was going to be killing
13 everybody else, but when it got down to where I had to do some
14 killing myself, then I just didn't want to get involved.

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1 THE COURT: That is when you had it?

2 THE WITNESS: Yes.

3 THE COURT: I'm sorry. Go ahead.

4 Q BY MR. WEEDMAN: Now, in an effort perhaps to
5 relate some of this to the alleged death of Shorty Shea, did
6 you ever hear any of the members of the family sitting around
7 planning to kill Shorty Shea?

8 A No.

9 Q Did anyone ever mention Shorty Shea as one who was
10 going to be killed in the family?

11 A No.

12 Q And particularly did my client, Steve Grogan, ever
13 tell you that he was going to kill or participate in killing
14 Shorty Shea?

15 A No.

16 Q In connection with helter-skelter, did the name of
17 Shorty Shea come up as one who was -- well, who was going to
18 be involved in helter-skelter?

19 A The name Shorty Shea, never did I hear it involved
20 with helter-skelter until he had already been killed. That
21 is what I heard.

22 Q Yes. Till he had already been killed, and that,
23 of course, related to things, particularly to what Charles
24 Manson apparently told you and what my client apparently told
25 you, is that so?

26 A Yes, that is so.

27 Q Did you know a man at the ranch, at least at the
28 adjoining ranch to Spahn Ranch, named Frank Retz?

A Did I know of him?

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Q Yes.

A No, I didn't. I knew of him, but I didn't know him. Yes, I knew of him.

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5Q1

1 Q During the time that you were there at Spahn
2 Ranch with the family was there any -- were there any disputes
3 or arguments between any members of the family and Frank Retz?

4 MR. KATZ: Are you asking for personal knowledge,
5 counsel? Otherwise there is an objection on the grounds
6 calls for conclusion and speculation.

7 THE COURT: Let me have the question, please.

8 (The question was read by the reporter
9 as follows:

10 "Q During the time that you were
11 there at Spahn Ranch with the family was there
12 any -- were there any disputes or arguments
13 between any members of the family and Frank
14 Retz?")

15 THE COURT: I overrule the objection. Objection
16 overruled.

17 I don't like to state reasons at this time. But I
18 think because of the nature of the direct examination it
19 undoubtedly, I think, is a question that may be asked.

20 The full consensus or concord of the jury respecting
21 the facts, the inferences that may or may not be drawn from it,
22 is up to the jury.

23 But I think the question is all right. You may
24 answer the question.

25 Now, read the question again to the witness.

26 THE WITNESS: I understood the question.

27 THE COURT: You have it?

28 All right.

5-2

1 THE WITNESS: I didn't see anyone -- I never saw Frank
2 Retz.

3 Q BY MR. WEEDMAN: To your knowledge, Mr. Watkins,
4 did the family -- well, let me start over again.

5 To your knowledge did the family go to the desert,
6 when they did go to the desert in September of 1969, volun-
7 tarily?

8 MR. KATZ: I will object on the grounds this witness has
9 no personal knowledge. He was at Barker Ranch at that time
10 when they arrived. Therefore anything would call for conclu-
11 sion, speculation and hearsay.

12 THE COURT: All right.

13 Have you finished your question?

14 MR. WEEDMAN: Yes, I have. Thank you.

15 THE COURT: Read the question, please.

16 (The question was read by the reporter
17 as follows:

18 "Q To your knowledge did the family
19 go to the desert, when they did go to the
20 desert, in September of 1969, voluntarily?"

21 THE COURT: Well, probably the objection is well taken.
22 Sustained.

23 MR. WEEDMAN: May I ask on what grounds, your Honor, so
24 I can perhaps frame my next question.

25 THE COURT: Well, read the objection.

26 MR. WEEDMAN: I asked of his own knowledge.

27 THE COURT: What worries me is whether his own knowledge
28 still has a basis of fact upon which to be delivered. Gets

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1 into conclusional matters, is what disturbs me.

2 MR. WEEDMAN: All he has to say is no, if he doesn't
3 know, your Honor.

4 THE COURT: All right.

5 You can answer it. Can you answer that question
6 from your own knowledge? Do you have any way of answering
7 that question, do you have knowledge on that question to
8 answer it?

9 THE WITNESS: No.

10 Q BY MR. WEEDMAN: To your knowledge did the family
11 want to stay at Spahn Ranch as distinguished from wanting to
12 go to the desert to fulfill the plan for helter-skelter?

13 MR. KATZ: Once again there is an objection on the
14 grounds that this witness would not be percipient to that as
15 he was in the desert in that time period.

16 Therefore calling for conclusion.

17 MR. WEEDMAN: I am not bound by that, your Honor, in
18 asking questions on cross-examination.

19 THE COURT: Well, you can answer.

20 MR. WEEDMAN: If Mr. Watkins doesn't know, again he can
21 say he doesn't know.

22 THE COURT: You can answer the question. Overruled.

23 THE WITNESS: I don't know.

24 Q BY MR. WEEDMAN: It is clear, though, is it not,
25 Mr. Watkins, that going to the desert was very definitely a
26 part of the family plan as related to helter-skelter?

27 A That is true.

28 Q Okay. So as far as -- in that sense then, as far

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1 as you know, the family did not wish to remain at Spahn Ranch
2 indefinitely, isn't that so?

3 A What the family wished is what Charlie wished.
4 And I don't know what Charlie wished.

5 Q Well, I am saying, though, in terms of what you
6 know about the family up to the time that you disassociated
7 yourself from the family, my question is as far as you know
8 the plan to go to the desert was still in effect and that's
9 what the family wanted to do?

10 A As far as I know, yes.

11 Q All right.

12 And that's distinguished from staying at Spahn
13 Ranch for an indefinite period of time, you understand that?

14 A Yeah, I understand.

15 Q Okay.

16 A But staying at Spahn Ranch was also part of the
17 plan.

18 Q We heard here, Mr. Watkins, that one of the
19 reasons that Shorty Sheawas killed, if in fact he is dead,
20 was that he was hired to throw the family off Spahn Ranch.
21 And therefore the family set about to kill him.

22 Does that make sense to you in light of what you
23 heard from the family with respect to helter-skelter?

24 A Does that make sense to me?

25 Q Yeah. Well, I don't mean conclusionally make
26 sense. Is that kind of thing consistent with what you knew
27 about the family's plans to go to the desert?

28 MR. KATZ: I am going to object on the grounds it is

1 ambiguous unless it takes into consideration conversations had
2 at Barker Ranch in September of 1969 and also at Spahn Ranch
3 in September of 1969.

4 THE COURT: Overruled. Answer the question, please.

5 Now, you better restate it. Discussion has been --
6 unless it is clear.

7 There was a question and then an amplification of
8 the question. I can either have the reporter read it to you,
9 or you can restate.

10 Which do you want, Mr. Weedman? You see, there
11 are two questions in there now.

12 MR. WEEDMAN: Well, perhaps the reporter could read it.

13 THE COURT: Read both questions.

14 Now, you listen to the reporter.

15 (The record was read by the reporter
16 as follows:

17 "Q We heard here, Mr. Watkins, that
18 one of the reasons that Shorty Shea was killed,
19 if in fact he is dead, was that he was hired
20 to throw the family off Spahn Ranch. And there-
21 fore the family set about to kill him.

22 "Does that make sense to you in light
23 of what you heard from the family with respect
24 to helter-skelter?

25 "A Does that make sense to me?

26 "Q Yeah. Well, I don't mean
27 conclusionally make sense. Is that kind of
28 thing consistent with what you knew about

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the family's plans to go to the desert?"

THE COURT: Now we are in an ambiguous state. I will have to ask you to restate your question if you will, please.

MR. WEEDMAN: All right, your Honor.

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5a-1

[REDACTED]

1 THE COURT: Because there is argument in there. It is
2 inconclusive now where we are.

3 MR. WEEDMAN: All right, your Honor.

4 Q Following -- let's just go back a little bit
5 chronologically. Perhaps we can move a little better up into
6 August and September of 1969.

7 It was around New Year's then of '68-69 that you
8 first began to become disenchanted with the family?

9 A That's not correct.

10 Q Oh, I am sorry. Well, when was it then? Let me
11 just ask you that again.

12 A My disenchantment, which is the words you used,
13 came in degrees. And it wasn't until May of 1969 that it came
14 to the degree that I left.

15 Q And in May then you went where again, please?

16 A I went to the Barker Ranch.

17 Q And how long did you stay at Barker Ranch before
18 leaving there?

19 A I stayed at the Barker Ranch then until in August
20 when I went down to get some supplies.

21 Q And where did you go for the supplies in August?

22 A Los Angeles.

23 Q Did you go out to Spahn Ranch at that time?

24 A Yes.

25 Q And who did you see there?

26 A I saw the whole family there.

27 Q Well, all right.

28 Then you went back to Barker Ranch, I take it,

1 with the supplies?

2 A Yes.

3 Q And then you again returned to Spahn Ranch, did
4 you not?

5 A Yes.

6 Q And when was that?

7 A Near September 6th.

8 Q And that is when you had a conversation with Steve
9 Grogan?

10 A Yes.

11 Q At which Brenda McCann, otherwise known as Nancy
12 Pitman, was present?

13 A Yes.

14 Q Why did you go back to Spahn Ranch on those two
15 occasions, if there was any particular reason, inasmuch you had
16 left the family?

17 A Well, because despite what was going on in the
18 family and the things I disliked about it, they were still
19 people that I love.

20 And so I wanted to go back and see them.

21 Q Now, after you had this conversation with my client
22 wherein he told you that he had chopped off Mr. Shea's head
23 and it went bloop, bloop, bloop and it was real groovy with
24 all the blood and so on, this gruesome story, did you again
25 return to Spahn Ranch?

26 A After I heard that story?

27 Q Uh-huh.

28 A No.

5a-3

Q Did you ever see my client again after that?

A Yes.

Q And where did you see him again?

A In the desert.

Q And how did you feel towards him when you saw him again in the desert after he had told you about this brutal killing?

MR. KATZ: Objection on the grounds that his feelings towards Mr. Grogan are immaterial.

THE COURT: Overruled.

The question is how did you feel toward him?

Is that right?

MR. WEEDMAN: Yes, your Honor. Thank you.

THE COURT: You may answer the question.

THE WITNESS: I felt a lot of disbelief mixed in with a fear.

Q BY MR. WEEDMAN: I am sorry. Fear?

A Yes.

Q Okay.

A Mixed in with trying to figure out what was going on.

Q Where did you see Steve Grogan, particularly in the desert, for the first time after this conversation that you had with him about the killing?

A One afternoon I was sitting in the ranchhouse with Brooks and Paul, and I looked out the door, and Steve and Charlie and Brenda and Sandy were walking up the wash into the yard.

1 THE COURT: What's the date. Will you set the time in
2 there.

3 MR. WEEDMAN: Yes. Thank you, your Honor.

4 Q About when was that? We know it was after September
5 7th.

6 A It was the middle of the month or so.

7 THE COURT: What month?

8 THE WITNESS: September.

9 THE COURT: Of what year?

10 THE WITNESS: 1969.

11 THE COURT: All right.

12 Q BY MR. WEEDMAN: Then did you go outside and talk
13 with them or they come inside, or what happened?

14 A They came inside, and Charlie plopped down on the
15 floor and went to sleep. And Clem sat down outside and
16 started playing the guitar.

17 And the girls started cooking something to eat.

#6

1 Q Now, you had seen my client at Spahn Ranch on
2 approximately September 7th and you had a conversation with
3 him there, and then you saw him in the desert at Barker Ranch
4 about a week or so later?

5 A Yes.

6 Q Am I right so far?

7 A Yes.

8 Q Now, when did you see him again after that?

9 A Every day or so, or just about every day he would
10 come wandering around the ranch.

11 Q Did you play any music with any of the members of
12 the family out there in the desert in September?

13 A No.

14 Q Did you see my client beyond September into October
15 of 1969?

16 A Yes.

17 Q Where was that, Mr. Watkins?

18 A At the Barker Ranch.

19 Q Did you talk to him?

20 A No.

21 Q Or anything of that sort?

22 A No.

23 Q Did there come a time when you went to court with
24 Steve?

25 A Yes.

26 Q Where and when was that?

27 A In Van Nuys court. It seemed to be around December
28 of 1970.

6- 2

1 Q Were you charged with anything in connection with
2 Van Nuys?

3 A No.

4 Q Was Mr. Grogan the only one who was charged with
5 anything?

6 A Yes.

7 Q And that was with grand theft auto?

8 A As far as I understood, yes.

9 Q And that involved a rental car, as far as you know,
10 that wasn't returned?

11 A A rental truck.

12 Q A rental truck that was not returned?

13 A Yes.

14 Q Was there any particular reason why you went to
15 court in Van Nuys with Steve in October, 1969?

16 A Yes.

17 Q What was that?

18 A To see that he got there.

19 Q How did you feel towards him at that time,
20 Mr. Watkins?

21 A Quite compassionate.

22 Q Did you dislike him?

23 A Not in any way.

24 Q Did you love him in a brotherly way?

25 A Yes.

26 Q When did you see him again after that court
27 appearance in Van Nuys, if you did?

28 A Every day. I was living with him.

1 Q Where was that?

2 A At the Spahn Ranch. No, at the Chandler -- at the
3 Chandler Street house and at the Spahn Ranch.

4 Q Who else was living with you and Steve at this
5 time?

6 A Lynn Fromme --

7 Q Was she a member of the family?

8 A Yes. Sandy Good --

9 Q Was she still a member of the family?

10 A Yes.

11 Brenda McCann --

12 Q Also a member?

13 A Yes. Sue -- some girl named Sue; a girl named
14 Lizzie --

15 Q Were they also members of the family?

16 A Yes. A fellow, Kevin; another fellow named Mark.
17 That was all.

18 Q Were those all members of the family?

19 A Well, Kevin and Mark and Lizzie and Sue never knew
20 Charlie. They were just -- they came around after the whole
21 thing broke apart.

22 Q Was there any reason, any particular reason, why
23 you continued to see these members of the family that you have
24 told that you were living with and particularly Steve?

25 A Yeah.

26 Q And what was that?

27 A There was a lot of reasons for it.

28 Q Well, let me put it this way. Were you in a sense

1 rejoining the family at this time?

2 A In a sense, yes, I was trying to.

3 Q Can you explain that for us in light of the fact
4 that you had left the family?

5 A Yes. It may be really stupid but I seem to have
6 this thing that I always want to understand everything, and
7 so when all these people got arrested for murder and all this
8 stuff started happening, I couldn't believe it, and so I
9 wanted to understand what was going on. So I figured the best
10 way to understand what was going on was just go and get right
11 down in the middle of what was going on.

12 Q Now, did you feel fear at being sort of back with
13 the family again, even though Charlie, I take it, was in jail
14 at this time?

15 A No, sir.

16 Q That is, you did not feel any fear?

17 A No.

18 Q Am I correct in that, that Charles Manson, so far
19 as you know, was in jail at this time when you started living
20 with Clem and the others?

21 A Yes.

22 Q How long did you continue to live with Steve
23 Grogan?

24 A Until Thanksgiving of that year, 1970. No; not
25 Thanksgiving, Easter.

26 Q Just for a point of clarification, what month and
27 year was that then?

28 A April, 1970.

1 Q And where were you living, that is, you and Steve
2 Grogan and the others whom you have named?

3 A At the Spahn Ranch and at the house on Chandler
4 Street in Van Nuys.

5 Q While you were there at Spahn Ranch during this
6 period of time in 1970, did you have any contact at all with
7 Frank Retz?

8 A No.

9 Q Did you have any trouble with Frank Retz?

10 A No.

6A

6A

1 Q Did Steve Grogan here have any trouble with Frank
2 Retz during this period?

3 A I don't know.

4 Q That you know of?

5 A Not that I know of.

6 Q Where was Ruby Pearl during this period of time,
7 if you know?

8 A She was hanging around the ranch.

9 Q Let me back up a minute, now.

10 You had a conversation with Clem on or about
11 September 7, 1969; you next saw him in the middle of September
12 up in the desert; you were in court with him in Van Nuys in
13 October, and then --

14 A No, sir.

15 Q I'm sorry.

16 A They got busted in October. I wasn't in court with
17 Steve until -- it seemed like December.

18 Q I see.

19 A When he got out of jail from that bust.

20 Q Then did you live with him from December of 1969
21 until April of 1970?

22 A Yes.

23 Q And did the other members, or the other persons,
24 that you have named for us continue to live with you and Steve,
25 that is, from December to April of 1970?

26 A It was probably more like January, as I recall it.
27 What happened then?

28 Q No. I just wanted to know if most of the other

1 persons whom you named were also living along with you and
2 Steve.

3 A That I had named?

4 Q A few minutes ago.

5 A Yes.

6 Q Were you all getting along well together or not?

7 A I guess you could say we were getting along all
8 right.

9 Q Was family life then like it had been before?

10 A No; in no way.

11 Q Now, during the contacts that you had with Clem,
12 with Steve Grogan, after September 7, when you had the conver-
13 sation with him about the killing, did he discuss it further
14 with you?

15 A No.

16 Q Did he ever mention it again, if you recall?

17 A Yeah, on one occasion.

18 Q When was that?

19 A When I had gone back to the ranch and a bunch of
20 detectives were poking around the ranch --

21 Q I'm sorry --

22 A They were bringing --

23 Q Excuse me. When was this?

24 A When I went back to Spahn's Ranch later in that
25 year, around April or May. No; wait a minute. It was like --
26 it would be around March of '70.

27 A bunch of detectives were poking around the ranch,
28 and I just -- they were bringing Sadie Glutz over from Sybil

1 Brand, and I was just telling them that they were looking for
2 Shorty's body, and he said, "Oh," and that was the extent of
3 the conversation.

4 Q So would it be fair to say then that you had a
5 conversation with Mr. Grogan on September the 7th, or at least
6 approximately September the 7th, about Shorty Shea, and then
7 several months later in 1970, around April I believe you said,
8 when they brought Susan Atkins out -- she had been arrested
9 for the Tate-La Bianca murder at this time, is that right?

10 A Yes.

11 Q And the detectives had brought her out to the
12 ranch as part of their investigation, as far as you know,
13 isn't that so?

14 A Yes.

15 MR. KATZ: Excuse me. I will object as calling for a
16 conclusion of the witness as to whether or not it was part of
17 the Tate-La Bianca investigation.

18 MR. WEEDMAN: It is not material. I will withdraw it.

19 THE COURT: I don't think it makes much difference.
20 I will sustain the objection.

21 Q BY MR. WEEDMAN: In any event, she was in custody
22 at that time and something was going on there at the ranch?

23 A Yes.

24 Q And you said to Clem, "They are looking for Shorty's
25 body," or you thought they were looking for Shorty's body?

26 A I told him that they were.

27 Q And he said, "Oh"?

28 A Yes.

1 Q Okay. Now, did the drug usage continue, in your
2 life at least, past May of 1969 when you left the family and
3 went to the desert?

4 A Yes.

5 Q What did you continue to use?

6 A At that time I quit using drugs altogether.

7 THE COURT: That was what date? May of '69?

8 THE WITNESS: May of '69. Then when I moved back with
9 them, it was until like December or later, about January --

10 THE COURT: Of what year?

11 THE WITNESS: '70.

12 THE COURT: '70?

13 THE WITNESS: Yes.

14 Then I started smoking grass again and I took an
15 LSD trip with them.

16 Q BY MR. WEEDMAN: With whom?

17 A With Clem and Gypsy and Sandy and Lynn and Lizzie
18 and Mark and Kevin.

19 THE COURT: State that again. When was that?

20 THE WITNESS: January or so, approximately.

21 THE COURT: Of what year?

22 THE WITNESS: Of 1970.

23 THE COURT: All right.

24 MR. WEEDMAN: If I may have a moment, your Honor.

25 THE COURT: Yes.

26 MR. WEEDMAN: Your Honor, may I confer with counsel for
27 a moment?

28 THE COURT: Yes, go ahead.

I think we ought to take a short recess.

MR. WEEDMAN: Yes. Thank you.

THE COURT: Let's take a short recess. We will go right ahead then.

Do not discuss the case.

(Recess.)

7 fls

7-1

1 THE COURT: All right. Now, gentlemen, we are back in
2 session. People versus Grogan.

3 Defendant is here. Counsel are here.

4 State your name again, please.

5 THE WITNESS: Paul Watkins.

6 THE COURT: You have been sworn.

7 You can bring in the jury, Sheriff.

8 THE BAILIFF: Yes, sir.

9 THE COURT: Thank you.

10 (The following proceedings were had
11 in open court in the presence of the
12 jury:)

13 THE COURT: Now we have all the jurors plus the
14 alternates.

15 You may proceed, Mr. Weedman.

16 MR. WEEDMAN: Thank you, your Honor.

17 Q When you left the family, as I understand it in
18 the latter part of May of 1969, and went up to the desert and
19 traveled around as you described for us, what were you doing
20 for money in those days?

21 A Mining gold.

22 Q Did you actually yourself, actually come up with
23 some gold?

24 A Yes.

25 Q What did you do with the gold?

26 A Sold it.

27 Q Where did you sell it?

28 A In Las Vegas.

7-2

1 Q And did Paul Crockett work along with you in this
2 prospecting thing?

3 A Yes.

4 Q How about Mr. Berry, was he also in on it?

5 A Yes.

6 Q How about Brooks Poston, was he also involved in
7 gold mining?

8 A Yes.

9 Q How much money did you get for the gold you --
10 well, let me ask you this: how much money did you, yourself,
11 personally get as a result of gold mining?

12 A Enough to live on.

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#8

1 Q How much was that? Can you give us an idea?

2 A We could get about an ounce of gold every three days.
3 An ounce of gold is worth \$35.

4 Q When you say "we," does that mean that the three
5 of you earned \$35 every three days, approximately?

6 A It took four people to do that.

7 Q Four people. So that --

8 A Including a girl who was doing the cooking. So
9 that makes five people.

10 Q Was that girl Juanita?

11 A Yes.

12 Q Was Juanita Brooks Poston's girl friend?

13 A No, I wouldn't say that.

14 Q Was she anybody's girl friend?

15 A She is married to Bob Berry now.

16 Q I'm sorry. Well, weren't she and Brooks Poston
17 living together at one time out in the desert?

18 A Yes.

19 Q Did you ever live with Juanita?

20 A Yes.

21 Q I meant live with her like boyfriend-girl friend
22 style.

23 A No. I lived with her family style.

24 MR. KATZ: Excuse me. That is ambiguous.

25 MR. WEEDMAN: I can ask what family style. That's all
26 right. I'll move on.

27 Q So that each of you, then, made about \$8.50 every
28 three days. That breaks down to about \$2.50 a day or

1 thereabouts.

2 A That is a pretty good calculation, yes.

3 Q Is that about right?

4 A I reckon. I didn't calculate it down to that.

5 That makes about enough to eat on and buy gasoline.

6 Q Yes. I was going to ask you how you got to Vegas
7 to sell the gold.

8 A However I could.

9 Q Did you go by car?

10 A Sometimes. Sometimes hitchhiked.

11 Q Whose car would you use when you went?

12 A It depended on the situation. We had associates
13 that were working with us who had trucks and cars. We had
14 our own trucks up there in the canyon, but we couldn't drive
15 the trucks out of the canyon.

16 Q Why was that?

17 A Because they weren't licensed. They had no head-
18 lights, things like that. They were strictly mining vehicles.

19 Q Did these belong to Mr. Crockett or Poston or who?

20 A One belonged to Mr. Crockett and one belonged --
21 two of them belonged to Gail Beausoliel.

22 Q How long did you participate in the gold mining
23 following May of 1969?

24 A I am still into it.

25 Q And since we are really talking about '69, let's
26 say up to the middle of 1970, about how much money would you
27 get -- let me start over again. Withdraw that.

28 Was this your primary source of money, say from

1 May of '69 to the middle of 1970?

2 A The middle of 1970? No.

3 Q What was your primary source of income for those
4 months?

5 A We had to stop mining gold when the family got up
6 there, and then we didn't do anything for money until late
7 in October when we began to work, Brooks and Paul and I, at
8 another job.

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1 Q What job was that?

2 A The Charles Brown Company in Shoshone.

3 Q Was this a construction company?

4 A It's a pretty wide ranging job. Ranging from
5 construction to destruction, to talking, to all kinds of work.

6 Q Well, let's see. You left the family the latter
7 part of May and went up to the desert, as I understand it. You
8 began doing a little prospecting with Crockett and Berry and
9 with Juanita doing the cooking and helping out.

10 How long did that prospecting go on then until you
11 say the family arrived and you couldn't go on with it? How
12 long did that last?

13 A They arrived there in the very first part of
14 September and that's when we knocked it off.

15 Q And then your income didn't -- from that didn't
16 resume now until when?

17 A Until October.

18 Q Just -- well, you just stopped for about a month
19 then, would that be a fair statement, approximately?

20 A Until the end of October, which would make it --

21 Q More nearly two months?

22 A About two months.

23 Q Couple of months.

24 All right.

25 Was there any particular reason why you stopped
26 because the family had moved in the desert?

27 A Yeah.

28 Q What was that?

9-2

1 A We didn't want to go to the mines because then
2 they would follow us.

3 And then they would know where our mines were.

4 Not because we was afraid they could take them away,
5 but afraid they would fill them up with junk. Raisins and
6 peanuts and gasoline and stuff.

7 Q Okay.

8 Now, you weren't panning for gold then, I take it,
9 you were digging for it? Gold ore, I mean?

10 A We did both. Dug it and panned it.

11 Q I see. You dug it out and used a sluice box?

12 A Dug it and crushed it and panned it.

13 Q Okay. In any event then, did you resume the gold
14 mining the latter part of October 1969?

15 A Not mining, no. We went into prospecting then.

16 Q Okay.

17 Did your income, when you started up again after
18 a lapse of a couple of months, continue to be about the same?

19 A No.

20 Q What was it, what did it become?

21 A Became quite -- little more.

22 Q Were you, Crockett, Berry and Juanita still
23 together in the --

24 A No.

25 Q -- prospecting?

26 A Before the family got up there in September,
27 Juanita and Bob Berry left. And Stan Berry and the rest of
28 the Berrys all pulled out, and there was just me and Paul and

9-3

1 Brooks up there alone.

2 Q Did you all live together?

3 A Yes.

4 Q When was it that you began living together, just
5 with Crockett and Brooks Poston?

6 A Without any other people around?

7 Q Yes.

8 A About the middle of August. There were no people
9 around there until September, which wasn't very long.

10 Q 1969?

11 A Yes.

12 Q Okay. What was Paul Crockett's attitude towards
13 Charles Manson and the family?

14 A His attitude?

15 Q Uh-huh.

16 A I was impressed that his attitude was he wanted to
17 understand what was going on.

18 Q Paul Crockett have a kind of philosophy of life
19 that was in any way similar to Charles Manson's?

20 A Yes.

21 Q And is there a name for this kind of philosophy
22 that Paul Crockett had?

23 A No.

24 Q Did Scientology have anything to do with Paul
25 Crockett's life philosophy?

26 A Paul Crockett had been through the school of
27 Scientology.

28 Q Okay. What about Brooks Poston?

1 Did he have any background, any formalized
2 background in Scientology?

3 A No.

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#10

1 Q Did he have any background in any other kind of
2 life philosophy?

3 A I reckon he did.

4 Q When did you first become aware that Paul Crockett
5 did have a background in Scientology?

6 A The first day I met him.

7 Q When was that, again, please?

8 A It would be around May of 1969.

9 Q Shortly after you left the Manson family?

10 A Yes.

11 Q And did Crockett then begin to discuss this
12 philosophy of his with you?

13 A Yes.

14 Q Did you find his philosophy attractive?

15 A Yes, I did.

16 Q Did you find Paul Crockett's way of life what you
17 were looking for?

18 A No. That is a different story. His way of life
19 wasn't of such interest to me. It was more what he knew that
20 I was interested in there.

21 Q By "what he knew," do you mean his philosophy, his
22 personal philosophy?

23 A Call it what you like. I call it what he knew.

24 Q What he knew?

25 A Yes.

26 Q Did he assume somewhat the role of teacher?

27 A Yes.

28 Q And you the role of pupil or student?

1 A Yes.

2 Q And did Brooks Poston also become a student or
3 pupil in relation to Paul Crockett?

4 A Yes.

5 Q Did you thereafter develop a friendship with Paul
6 Crockett?

7 A Yes.

8 Q Would you characterize that friendship as a strong
9 friendship or not?

10 A I would say it was quite strong.

11 Q Was there something about the relationship that
12 would be perhaps even stronger than we might ordinarily regard
13 a friendship to be?

14 A Yes.

15 Q Was there perhaps a spiritual bond between you and
16 Paul Crockett?

17 Excuse me. Again, if those words have any mean-
18 ing --

19 A Those words may not say it. I'll explain it like
20 this, so maybe you can understand it.

21 It is not like a bond, but we shared a common
22 thing because -- well, Brooks was in a state of consciousness,
23 in a state of mind, that was really something else. He was
24 like next to death. He was like dead. For months and months
25 he would be in -- for weeks at a time he would be unconscious,
26 just laying on the ground, laying in one place.

27 Q Excuse me. Where was this, Paul?

28 A He would go into this at the Spahn Ranch, at the

1 Gresham house, and later at the Barker Ranch. He was the same
2 way. He was like a zombie, just really in a low state of
3 consciousness, like walking death.

4 So, I knew how Brooks was, that he was like this.
5 He wasn't like this all the time. He was like this after he
6 got to know Charlie, more and more, and the more he was with
7 the family, the more he got like that.

8 And then I didn't see him for a matter of months,
9 when I was -- when he stayed in the desert to secure the
10 ranch with Juanita, and then I didn't see him until May when
11 I got back up there.

12 Q So he and Juanita left the family and went up to
13 the desert?

14 A No. They were on instructions from Charlie to
15 hold the ranch. They were to stay there and hold the ranch
16 for him.

17 Q They were gone away from Spahn Ranch then?

18 A They were at the Barker Ranch.

19 Q And they went up to the Barker Ranch, so you
20 didn't see Brooks then for some period of time?

21 A Yes.

22 Q When you finally did see Brooks up at the Barker
23 Ranch, was he still in this sort of unconscious state that you
24 have described?

25 A No. It was really far out. He had color in his
26 face and his eyes were bright and he was moving around, and
27 when I saw him, he threw his arms around me and greeted me and
28 he acted like a responsive, alive human being.

1 And I said, "Wow, what happened to you?" you know.

2 And he said, "I've been working with this fellow,"
3 and then he introduced me to Paul Crockett.

4 Q What appeared to be then the relationship between
5 Paul Crockett and Brooks Poston?

6 A Well, that I didn't know. I was a little bit
7 leery of this guy Paul Crockett because he had short hair,
8 first of all, and he was in his late forties, and as far as
9 I had been told, he was a pig.

10 So I just -- but it was apparent that something
11 had been done with Brooks; that he had definitely changed.
12 So I wanted to understand what the relationship between Brooks
13 and Paul was there, too.

14 Q How would you describe yourself, that is, your
15 physical state, your emotional and mental state at the time
16 you met Paul Crockett out there in the desert?

17 A Well, I was in pretty low state myself.

18 Q Excuse me. Go on.

19 A I was getting really fed up with the life that I
20 was living with Charlie and the family. I was getting so bored
21 with it that I slept all day. I would sleep all day long and
22 get up, and it was getting so intolerable, the motorcycle
23 guys riding around with machine guns and everybody talking
24 about helter-skelter and all this bull, that I just stayed
25 stoned all the time. That is the only way I could tolerate
26 it, just stay wiped out constantly.

27 So when I got up there, I was in a state --
28

11-1

1 Q Excuse me. What does that mean so we will know?

2 A Stoned?

3 Q Uh-huh.

4 A I smoked grass. I would wake up, smoke some grass
5 and just stay that way until I went to sleep.

6 Q How long had that been going on up until May when
7 you left the family?

8 A It got increasingly worse in that last month I
9 stayed with the family.

10 Q Stoned most of the time?

11 A Yeah.

12 Q Would you describe your own mental state and
13 emotional state, physical state as approximating that of
14 Brooks Poston when he was sort of unconscious, I think you
15 described it for us?

16 A I was getting there but I hadn't -- hadn't got
17 down to it yet, and he was -- no, I wasn't near there.

18 Q Do you think LSD played a role in this?

19 A Yes, I would say LSD played a role in this.

20 Q Did you experience a reaction to LSD, say, several
21 days or so after the actual trip was over?

22 A No, I didn't have any of those.

23 Q Is there a name for that kind of thing, that you
24 know of?

25 A Flashback.

26 Q Or flash?

27 A Yeah.

28 Q Did you ever have any flashes?

11-2

1 A No.

2 Q A flash is -- you understand that to mean a --

3 A Reoccurrence.

4 Q A reoccurrence, even though you haven't literally
5 taken any more LSD?

6 A No, I haven't had anything like that.

7 Q In any event, when you got out to Barker Ranch
8 the latter part of May of 1969 you saw Brooks Poston and he
9 looked -- he looked healthy again, right?

10 A Yeah.

11 Q And it appeared as though Paul Crockett was
12 responsible for that and you then, I take it, wanted to find
13 out what had caused that?

14 A How he did that, yeah.

15 Q Okay. And then you -- did you move in at that
16 time with Crockett and Poston?

17 A No.

18 Q Where were you staying then when you first went
19 out to the desert?

20 A Well, I went up there with a girl named Bo and
21 then we delivered the supplies to 'em which consisted of a
22 truckload of sweet rolls.

23 And then I stayed there for three days. Went
24 back to the Spahn Ranch and then moved back to the Barker
25 Ranch after about -- stayed at the Spahn Ranch for about six
26 days. Went back to the Barker Ranch.

27 Q Okay. And then did you move in with Crockett?

28 A Yes.

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1 Q And Brooks Poston?

2 A Yes.

3 Q Okay. That's when you began --

4 THE COURT: Just a minute.

5 Tell that man if he wants to read newspapers,
6 Sheriff, to read them out in the hall and not in the courtroom.

7 That man in the green shirt right there. Thank
8 you.

9 THE BAILIFF: Yes, sir.

10 THE COURT: Sorry for the interruption.

11 MR. WEEDMAN: Not at all, your Honor.

12 Q Then you began doing some prospecting, gold mining
13 with Crockett and Poston, right?

14 A Yes.

15 Q And during the subsequent weeks and months did
16 your relationship with Paul Crockett become increasingly
17 closer?

18 A Yes.

19 Q When the family arrived, that is, the rest of the
20 family arrived in September, as I understand it --

21 A Uh-huh.

22 Q -- 1969, did this have a tendency to interrupt or
23 interfere with your relationship between -- interfere with
24 relationship between yourself and Paul Crockett?

25 A It had a tendency to test what I really wanted to
26 do at that point. You know, it was a matter of Charlie saying,
27 "Come with me" and I was wanting to stay and study with Paul.

28 And so rather than interrupt it, it was just like

11-4

1 a test to see what I really wanted to do.

2 Q Did you make a decision?

3 A Yes.

4 Q What was that decision?

5 A That decision was to stay away from the family.

6 Q Is that what Paul Crockett wanted you to do as
7 well?

8 A Yes.

9 Q What about Brooks Poston? Did he express any
10 preference?

11 A He decided to stay away from the family too.

12 Q Did Paul Crockett want him to stay away from the
13 family?

14 A I guess. I guess so. I suppose he would after
15 working all that time. I guess he didn't want to fall back
16 into it.

17 Q Just briefly, can you summarize or tell us what
18 this philosophy was that Paul Crockett had?

19 A Well, as I stated -- figure out how Brooks got to
20 this place, got healthy again and alive, I found out just
21 exactly what and how he did it.

22 And to explain it to you would just be pretty
23 simple. Hard work.

24 We started working and worked pretty hard.

25 Summertime in Death Valley, it's 120 degrees, and
26 we were climbing up mountains and digging gold ore out of mines.
27 And putting it on our backs a hundred pounds at a time,
28 carrying it down the mountains. And getting gold out of the

11-5

1 rocks.

2 Q You mentioned that you wanted to continue your
3 studies. What did you mean by that?

4 A Well, you could call it studies. It's really just
5 work. We was working on ourselves to get our bodies back into
6 optimum shape and our minds into optimum shape.

7 Q Apart from hauling the ore and the hard physical
8 labor wasn't there some kind of discussion about life and about
9 some kind of --

10 A Sure.

11 Q -- philosophy of life?

12 Well, that's the philosophy that I am concerned
13 about. If you can summarize it for us.

14 A Summarize it?

15 Q Uh-huh.

16 A Okay. I will summarize like this. People say --
17 people ask me, they say, "What religion do you -- what
18 religion are you into now? In what church do you live by?"
19 And I say, "I live by a church of -- that -- of
20 my own."

21 And they say, "Well, which one is that? You know,
22 what do you call it?"

23 I says, "Well, I call it the 'do church'".

24 "The 'do church,' what is that?"

25 I say, "Well, it means you do as much as you can."

26 And "Well, how does that get to be a church?"

27 And says, "Well, the more you do, the more you
28 have. And the more you have, the more you become. The more

11-6 1 you become the more you can do.

2 "And then the more you do, the more you have. And
3 the more you have the more you become. And then the more you
4 become the more you can do."

5 And it's sort of a growing situation. And that is
6 really the essence of this work consisted of, learning to do
7 more things in order to become more.

8 Q Now, before the bulk of the family -- no, strike
9 that.

10 After the bulk of the family came out to the desert
11 in September of 1969 were you around in October, that is
12 October 10th and October 12th when there was some raids and
13 arrests made at Barker's-Myers Ranch?

14 A Was I around?

15 Q Uh-huh.

16 A I was around.

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#12

1 Q Were you arrested on October 10th or October 12,
2 1969?

3 A No. I was around the planet; I wasn't around the
4 Barker Ranch.

5 Q I'm really getting a little ahead of myself.
6 Let's move back to -- let's move back to September when you
7 hadn't spoken to Clem yet, Clem hadn't yet told you that he
8 had killed Shorty or participated in such a killing. You went
9 to Las Vegas in response to a notice, I take it, for induction
10 into the army?

11 A Yes.

12 Q And then you got there around the 2nd of September,
13 am I correct?

14 A Yes.

15 Q And then you went to Los Angeles and actually took
16 your physical there, is that correct?

17 A Yes.

18 Q What was the result of that physical?

19 MR. KATZ: I'm going to object, your Honor, as being
20 wholly immaterial and irrelevant.

21 THE COURT: I will sustain the objection. Sustained.

22 Q BY MR. WEEDMAN: Did you have any discussions
23 with Paul Crockett relative to that army physical?

24 MR. KATZ: Objection. Immaterial and irrelevant.

25 MR. WEEDMAN: Relative to taking it.

26 THE COURT: I think so. Sustained.

27 MR. WEEDMAN: Well, I'll be happy to make an offer of
28 proof, then, your Honor.

1 THE COURT: All right. Step in chambers, if you will,
2 gentlemen.

3 (The following proceedings were had in chambers,
4 outside the presence of the jury.)

5 THE COURT: We are in chambers. The defendant and all
6 counsel are here. Go ahead.

7 MR. WEEDMAN: Your Honor, I have reason to believe that
8 Paul Crockett instructed Paul Watkins how to feign lung
9 trouble in order to avoid passing the physical, and therefore
10 to avoid being drafted into the army.

11 That is relevant because I'm hoping to show by
12 this line of cross examination that this young man, Paul
13 Watkins, was very much under the dominion and control of Paul
14 Crockett, such that I think that it will have considerable
15 weight relative to this witness' credibility.

16 I'm only really concerned about one thing and that
17 is whether we can really believe that my client told Watkins
18 on September 7th that he had chopped Shorty's head off.
19 Obviously that is the only thing we are really concerned about
20 here.

21 THE COURT: Now, what exactly -- what questions would
22 you want to propound to the witness?

23 MR. WEEDMAN: I'm going to ask him if he had any conver-
24 sations with Paul Crockett relative to the taking of this
25 army physical.

26 THE COURT: Suppose he answers yes? Then what would
27 you ask?

28 MR. WEEDMAN: I'm going to ask what they were.

1 MR. KATZ: I would like to be heard.

2 THE COURT: Yes.

3 MR. KATZ: I don't think I could have been more gener-
4 ous this morning than allowing Mr. Weedman to explore areas
5 that I feel are not germane to the issues in this case, and
6 yet I withheld bringing forth objections so that Mr. Weedman
7 could develop relationships from which inferences may be
8 drawn concerning the influence of one person over another.

9 Now, I think that Mr. Weedman has gone far enough
10 in this area insofar as it concerns whatever relationship
11 there was between Paul Crockett and Paul Watkins, and that
12 he has established by his cross examination that there was a
13 close bond between the two, he has established further that
14 Watkins was there to study from Crockett.

15 But I think it is now -- there is no further
16 relevance nor is it material to the proceedings at this time
17 to know what Paul Crockett told him with reference to a highly
18 collateral issue, namely, the taking of the physical examina-
19 tion at Los Angeles in the first part of September, 1969.
20 It would call for hearsay, it would be irrelevant, it would
21 be immaterial and we would get into another trial within a
22 trial.

23 THE COURT: Well, I think it is probably going pretty
24 far. I think the objection is well taken, gentlemen. It is
25 reaching out pretty far.

26 MR. WEEDMAN: Your Honor, essential to our defense is
27 to show, and we intend to show this by other witnesses, of
28 course, but it is essential to our defense to show that

1 Paul Watkins is very much under the influence of Paul Crockett.

2 Now, supposing Paul Crockett told this man to
3 lie in connection with the federal government. It seems to
4 me that it is the kind of thing that we should be able to go
5 into.

6 THE COURT: I will sustain the objection to the offer
7 of proof, gentlemen. Objection sustained.

8 MR. KATZ: Thank you, your Honor.

9 MR. WEEDMAN: May I say -- well, never mind. Thank you,
10 your Honor.

11 THE COURT: All right.

12 (The following proceedings were had in
13 open court in the presence of the jury.)

14 THE COURT: Sustained. You may proceed, Mr. Weedman.

15 Q BY MR. WEEDMAN: Did you pass the physical?

16 A No.

17 Q What was wrong with you?

18 MR. KATZ: I'm going to object to it as being completely
19 immaterial to the proceedings at this time.

20 THE COURT: You may answer. Sustained. Ask the next
21 question.

22 MR. KATZ: There has been a question that has not been
23 answered.

24 THE COURT: Read the question.

25 (Record read by the reporter, as follows:

26 "Q What was wrong with you?")

27 THE COURT: Well, you can answer the question.

28 THE WITNESS: I don't know.

1 Q BY MR. WEEDMAN: Did you report some kind of
2 physical ailment to the draft doctor?

3 A No.

4 Q And they didn't tell you why you didn't pass?

5 A No. They just told me to get out of there.

6 Q Now, did you have a conversation with Charlie
7 Manson in April of 1969 -- this is the month before you left
8 the family -- wherein something was said about your leaving
9 the family?

10 A Yeah.

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1 Q And what was that, Mr. Watkins?

2 A Which conversation are you referring to, the one
3 when I --

4 Q I'm talking about a conversation, if such existed,
5 between yourself and Charles Manson in April of 1969 and
6 relative to your leaving the family, either you mentioned it
7 or Charles Manson mentioned it.

8 A This is when I went up to Barker Ranch and came
9 back, or -- the first time I came back or after I had been
10 up there for a spell and then came back?

11 Q I don't know. But you remember --

12 A In April? You see, that would be --

13 Q That would be before you went up. It would be
14 before you went up to Barker permanently.

15 A It would be more like May.

16 Q All right. Was there such a discussion then in
17 May of 1969?

18 A Yes.

19 Q Did that relate to your leaving the family?

20 A Yes.

21 Q What did Charles Manson say in that conversation
22 and what did you say?

23 A I believe the conversation you have in mind is the
24 one where I asked Charlie to release me of all agreements that
25 we had ever had, and he said, "Sure, I release you of all your
26 agreements."

27 Q Was there ever a time when Charles Manson told you
28 to leave him alone?

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A To leave him alone?

2

Q Yes.

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A Yes.

4

Q When was that?

5

A He never really said it that way. Like a lot of times when I wouldn't do something he said, he would just say, "Well, if you're not going to do it, then get off down the road right now." He would say it like that.

9

Q Well, was there a conversation with Charles Manson before you went up to Barker Ranch in May?

11

A Yes.

12

Q In which Charles Manson told you to leave the family, or words to that effect?

13

14

I don't want to put any words in your mouth.

15

A No.

16

Q I want you to tell us if there was such a conversation.

17

18

A No. When I went up there in May, he told me to go, but it was just to take supplies to Brooks and Juanita. I was to return.

19

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21

Q All right. And when you went up there in the latter part of May, did you make your feelings known to the family, that is, that you were leaving, that you didn't want to be with the family any more?

22

23

24

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A When I went back to the ranch?

26

Q Yes.

27

A No, I didn't.

28

Q Did you feel disappointed that things had turned

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1 out that way between yourself and the family in May of 1969?

2 A Yes.

3 Q Did you feel unhappy that things had turned out
4 that way between yourself and the family?

5 A Yes.

6 Q Did you feel when you went up there that you were
7 back on the road, as it were, again looking for -- looking for
8 someone, looking for something that you could relate to and be
9 happy with?

10 A Yes, you could say that.

11 Q Pardon me?

12 A You could say that.

13 Q Did you find that in Paul Crockett?

14 A Some of it.

15 Q What happened, if anything, between yourself and
16 Paul Crockett to cause you to come back to Los Angeles and
17 start living with members of the family again?

18 A What happened? I decided --

19 Q Was there something about Paul Crockett and that
20 life there that disappointed you in some way?

21 A No. It was just that there are some things that
22 I had to find out for myself, and there is no way, nothing he
23 could do to help me find them out. So I left and went to find
24 them out.

25 Q Now, did there come a time up there at Barker-
26 Myers when there was a great deal of police investigation
27 going on, particularly relative to the Tate-La Bianca killings?

28 Q At the Barker Ranch?

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Q Barker-Myers area, yes.

A I don't know. Never while I was at the Barker and Myers Ranch did I talk to any policemen.

Q When did you first talk to a policeman in connection with any investigations that were going on up there, let's say, after the middle of August of 1969?

A The first time I started talking to the investigators was in Inyo County, the Inyo County Courthouse, on August -- no; September the 13th, 1969.

Q Who did you talk to at that time?

A I talked to Dave Steuber, head of the Highway Patrol; I talked to Frank Fowles, District Attorney; I talked to Buck, Lynn Compton, Assistant District Attorney; I talked to Paul Whiteley, Homicide Officer; I talked to, I believe it was, I talked to some auto theft guys. I think it was Gleason.

13

#13

1 Q Did you talk to any newspapermen?

2 A Yes.

3 Q At about this time?

4 A Yes.

5 Q Would it be fair to say that there were quite a
6 few newsmen up there in that area?

7 A Yes.

8 Q Asking questions?

9 And did there come a time, Mr. Watkins, when you
10 actually sold material?

11 A Yes.

12 Q To a publisher or to a news service?

13 A Yes.

14 Q Who did you sell this material to?

15 A I sold information that I gave, to two companies.
16 Stern Magazine in Germany and U. S. News -- no, wait a minute,
17 it was -- I think it was U. S. News and World Report.

18 No, it was some firm out of London. The World
19 Newspaper firm.

20 Q And did Paul Crockett also sell material, too?

21 A We did this together.

22 Q All right.

23 And who else, then, besides yourself and Paul
24 Crockett sold this material?

25 A Brooks Poston. Don Dorn. Jerry Le Blanc. Ivor
26 Davis. And Tony De Lanno.

27 Q Who are those persons?

28 A They are -- they were the mediators between us,

1 Brooks and I, and these companies.

2 Q Well, the ones that had -- the ones that sold the
3 story, though, were you, Crockett and Poston, right?

4 A Yes.

5 Q These other people didn't have anything to sell,
6 did they?

7 A Well, they took the story and sold it to the
8 companies and gave us some money.

9 Q All right.

10 How much money did you get?

11 A \$1100.

12 Q How about Paul Crockett? How much money did he
13 get?

14 A He got \$1100.

15 Q And how about Brooks Poston, how much did he get?

16 A He got \$1100 and there was another \$1100 Juan
17 Flynn got.

18 Q Did you make any more moneys from the sale of
19 stories to the press or to any publications?

20 A No. Not a red cent.

21 Q Okay.

22 Defts B Id Your Honor, I have an 8x10 black and white photo-
23 graph here. Perhaps that could be marked defendant's --

24 MR. KATZ: B.

25 MR. WEEDMAN: B for identification.

26 THE COURT: Yes, sir, may be so marked. You can mark
27 it, Mr. Weedman.

28 MR. WEEDMAN: You have seen this photograph?

1 MR. KATZ: We gave it to you.

2 MR. WEEDMAN: Thank you, Mr. Katz.

3 MR. KATZ: I have seen it, your Honor.

4 THE COURT: All right.

5 MR. WEEDMAN: Yes, he has. Thank you, your Honor.

6 Q I will show you defendant's B for identification,
7 Mr. Watkins, and ask you if you have ever seen that photograph.

8 A Yes.

9 Q Who does that depict?

10 A Me.

11 Q Okay.

12 THE COURT: May I see it so I know what is going on.

13 MR. WEEDMAN: (Handing.) Yes.

14 (Short pause.)

15 THE COURT: All right.

16 Go ahead.

17 Q BY MR. WEEDMAN: Would you hand that to me, Paul.

18 A (Handing.)

19 Q Thank you.

20 Since that's the only person in the photograph,
21 I take it that's you up there, Mr. Watkins.

22 A Yes.

23 Q And can you tell us what you were wearing when
24 that photograph was taken?

25 A A cape. It's really a parachute.

26 Q Was it designed to look like a cape, however?

27 A Yeah.

28 Q Is that the idea?

1 What are you apparently holding in your hand that
2 seems to be this bright spot?

3 A A candle.

4 THE COURT: Pardon me. Did you set the date?

5 MR. WEEDMAN: I haven't, your Honor.

6 THE COURT: All right, let's find out.

7 Q BY MR. WEEDMAN: What is the area here in which
8 this was taken?

9 A It's taken in the bedroom of the Barker ranchhouse.

10 Q Okay. And was this taken by a professional
11 press photographer, if you know?

12 A Yes. Taken by Don Dorn.

13 Q And when was that taken?

14 A It was taken when Charlie was getting --

15 Q Excuse me. Can you just fix the date for us,
16 first of all?

17 A No. Not really. I think it would be more like
18 into November or December.

19 No, it would be like November of 1969.

20 THE COURT: November of '69?

21 THE WITNESS: (Nodding affirmatively.)

22 Q BY MR. WEEDMAN: How much were you paid, if
23 anything, for this pose of this photograph?

24 A I wasn't paid anything.

25 Q Are you sure you were not paid \$1000 for this
26 photograph?

27 A Absolutely positive.

28 Q Mr. Watkins, did you ever tell anyone that you

1 were paid a thousand dollars for this?

2 A No.

3 Q Did you ever tell Sergeant Whiteley that you were
4 paid a thousand dollars to pose for this photograph?

5 A No.

6 Q Okay.

7 Why did you pose for this photograph?

8 A That photograph there?

9 Q Yes, sir.

10 A Was kind of a trip. It was like I found this
11 cape that was Charlie's cape. He used to wear it around up
12 in the desert.

13 I found it laying on the ground out there and we
14 got up there, and it was too late to take any shots of the
15 ranch 'cause it was dark.

16 So we said, "Well, if we put the camera on a --
17 about a second and a half exposure and I stand really still
18 with this candle in my hand, it will make it look like I have
19 got a bald light in my hand. And it will look really eerie."

20 And so we was just sort of just playing around.

21 And it did turn out pretty good, I must admit.

22 Q What did you understand the photograph was going
23 to be used for?

24 A It never got used. I didn't understand it would
25 ever be used.

26 Q The photographer that took it was a professional
27 photographer, though?

28 A Yes. If it had of got used I was supposed to

1 get money for it.

2 Q How much were you supposed to get for it?

3 A I don't know. We hadn't agreed on that yet.

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1 Q So as far as you knew then at the time you posed
2 for the photograph the motive was money, isn't that so?

3 A That's so.

4 Q Was there any other motive for your posing for the
5 photograph?

6 A No.

7 Q Did you pose for any other photographs up there
8 at Barker Ranch?

9 A Yes.

10 Q And were you paid anything for any of those
11 photographs?

12 A As far as I know two of those, of all the pictures
13 we took, got used.

14 Q What were you paid for those, if anything?

15 A Of the \$1100 apiece that we got for those.

16 But a lot of other ones, lot of other of those
17 photographs that we did take that day got used eventually, but
18 I never got any money for them.

19 Always seemed to -- never figured out how they got
20 out without getting money for them.

21 Q Were you supposed to get money for them?

22 A Yeah.

23 Q How much were you supposed to get?

24 A That was left open for negotiations when they got
25 used. And they just never seemed to -- what it amounted to,
26 I never took them to court over it.

27 Q Did you feel you were cheated then with respect to
28 photographs that were used for which you were not paid?

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A I didn't feel it. I knew it was true.

2

Q You were cheated?

3

A Yes.

4

Q Now, I would like to ask you about an incident which may have occurred, if it did, in 1970 involving the burning of a van.

6

7

8

Were you the occupant of a van which burned in 1970?

9

A Yes.

10

Q What month was that in?

11

12

13

A It would be in March or April. I thought it was April because there was some girl running around the hospital an Easter Bunny suit on. And I thought it was Easter.

14

15

But apparently the police have told me otherwise. So I don't actually know.

16

17

But I know it was either in March or April.

18

THE COURT: What year?

19

THE WITNESS: 1970.

20

MR. WEEDMAN: May I have just a moment, your Honor.

21

THE COURT: Yes.

22

(Conference between counsel and defendant, not reported.)

23

Q BY MR. WEEDMAN: What caused that fire?

24

A I don't know.

25

MR. KATZ: Object -- well.

26

27

Q BY MR. WEEDMAN: You had a lighted candle inside the van, didn't you?

28

A Yes.

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1 Q Had Paul Crockett told you that you should have
2 such a candle?

3 MR. KATZ: Excuse me, your Honor. I am going to object
4 on the grounds, irrelevant and immaterial.

5 If we want to try this lawsuit on the basis of
6 an event that occurred --

7 THE COURT: I think it's immaterial. I will sustain the
8 objection.

9 Q BY MR. WEEDMAN: Do you know where Steve Grogan was
10 when you were sleeping in the van the evening of the fire?

11 A No. I saw him earlier that night at the ranch,
12 at Spahn's Ranch.

13 Q Who owned this van?

14 A Guy named Mark Ross.

15 Q Had Paul said anything to you at all about if you
16 go down to Spahn Ranch you are going to be burned, or you are
17 going to be caught in a fire or something?

18 A No.

19 Q Do you remember telling anyone that?

20 A Oh, yeah. When I did go up he said one time, he
21 said, "You are going to get burned."

22 But I didn't know it to mean a fire. I figured
23 he meant I was going to get burned as far as money went and
24 as far as my time went and everything else went.

25 Q And Paul Crockett's prediction came true then,
26 didn't it?

27 MR. KATZ: Objection. Calls for speculation and
28 conclusion. The witness said --

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THE COURT: I will sustain the objection.

MR. KATZ: Thank you.

Q BY MR. WEEDMAN: Well, did you get burned?

A Yes, I got burned.

Q And to be fair about it, at least for a while you blamed the family for that, or at least some members of the family, didn't you, Paul?

A No.

Q You never did?

A (Shaking head negatively.) I was -- tried to -- people tried to convince me that it was so.

But I never -- I would never believe it.

Q I am sorry. Who tried to convince you?

A The police.

Q I see.

A They didn't try to convince me, but they kept saying, "Well, couldn't it have been?"

And as a matter of fact, people even told me that Clem told them that he had done it.

Actually I would like to know what really is true in that case. I was asleep.

Q Well, as you sit there now you don't believe that Steve set that van on fire, do you?

MR. KATZ: Excuse me. There is an objection on the grounds calls for conclusion and speculation.

THE COURT: Sustained.

MR. KATZ: Thank you, your Honor.

MR. WEEDMAN: Well, your Honor, counsel is so pleased,

1 you know, that he gets in a little hearsay.

2 THE COURT: Immaterial to this lawsuit. Sustained.

3 MR. WEEDMAN: Well, your Honor, I have no way of
4 combating it.

5 MR. KATZ: Put on --

6 MR. WEEDMAN: I don't need counsel's gratuitous remarks.

7 If he has a remark, let him address it to the
8 court, your Honor.

9 THE COURT: Well, I think it's immaterial. The answer
10 may be stricken. As far as I'm concerned, strike the last
11 answer.

12 Q BY MR. WEEDMAN: You did fall asleep with the
13 candle burning in the van, didn't you?

14 MR. KATZ: Excuse me, your Honor. I am going to object
15 on the grounds this line of questioning is immaterial and
16 irrelevant.

17 THE COURT: I think it is immaterial to our lawsuit.

18 MR. WEEDMAN: Can we just strike the whole thing?

19 THE COURT: I will.

20 MR. WEEDMAN: The whole conversation about the van?

21 THE COURT: Strike it out. The whole conversation.

22 MR. WEEDMAN: If I can't go on with it, I will have to
23 insist on that.

24 THE COURT: The whole conversation is stricken out. The
25 jury disregard it.

26 MR. WEEDMAN: I will cite it as an error in this case.
27 I am being precluded from cross-examination. Denial of due
28 process, your Honor.

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And I claim it as error at this time.

THE COURT: Well, overruled. Ask your next question.

MR. WEEDMAN: Very well, your Honor.

Q Now, going back to on or about September the 7th -- this is the last area I will touch upon, Mr. Watkins -- going back to that time, you had a conversation with my client, and he told you that he chopped Shorty's head off, and the head went bloop, bloop, bloop and so on.

Did he tell you where the body was buried?

A No.

Q Did you ask him?

A No.

Q Did you ask him when the killing occurred?

A No.

Q Did he tell you when it had happened?

A No.

#14

1 Q Have you told us everything that Steve told you
2 that time about the killing?

3 A No.

4 Q You haven't told us everything?

5 A No.

6 Q Is that because the prosecutor didn't ask you?

7 A No. It is because I didn't think of it.

8 Q When did you think of it?

9 A After I got back to my hotel room.

10 Q How many times have you been interrogated in
11 connection with this purported confession by my client?

12 A I would say at least a dozen times.

13 Q And is this something which you have omitted to
14 tell anyone up until this time?

15 A No.

16 Q You have mentioned it before?

17 A Yes.

18 Q Okay. What was it?

19 A In my statement in this court, I left out the
20 phrase that Steve used, "when he came to now," when he chopped
21 his head off.

22 Q "When he came to now" --

23 A "When he came to now, Charlie told me to cut his
24 head off, so I did."

25 Q That is an expression that Paul Crockett uses,
26 isn't it, Paul?

27 A No.

28 Q It is an expression when someone comes to now --

1 A It is strictly Charlie's phrase.

2 Q Isn't that an expression that Brooks Poston uses,
3 too, "coming to now"?

4 A If Brooks Poston uses it, he got it from Charlie.

5 THE COURT: Take your hand away from your mouth, please.

6 THE WITNESS: It is strictly one of Charlie's phrases.

7 Q BY MR. WEEDMAN: You never heard my client use
8 that expression before, did you, "coming to now"?

9 MR. KATZ: Excuse me --

10 THE WITNESS: Yes.

11 MR. KATZ: All right.

12 THE WITNESS: I have already said that I did. It's
13 crazy to ask the question.

14 Q BY MR. WEEDMAN: I'm crazy to ask the question?

15 A It's crazy.

16 Q When had you used LSD immediately prior to
17 September 7, 1969?

18 A The last time I had used it was way back when I
19 was with the family. It would have been three or four months
20 before that.

21 Q When Clem told you the girls buried the body, did
22 he tell you who the girls were?

23 A No.

24 Q Did you ask him?

25 A No.

26 Q Is it because you weren't interested that you
27 didn't ask?

28 A I didn't think of it.

1 Q Did you ask him any questions about this?

2 A Yes.

3 Q What did you ask him?

4 A The first question I asked was, "I heard Charlie--
5 Charlie told me you cut Shorty's head off." That was kind
6 of like a statement I questioned. It was like I made a
7 statement with a question mark.

8 Q Yes. Of course, we have heard about that question.

9 A That's all.

10 Q I'm talking about questions that occurred to you
11 about the details of this thing. Did you ask him any more
12 questions?

13 A No.

14 Q About where it happened, how it happened, who the
15 girls were, and so on?

16 A Unh-unh.

17 THE COURT: Speak up.

18 THE WITNESS: No.

19 THE COURT: Gentlemen, it's almost 12 o'clock. Let's
20 recess until 2 o'clock.

21 Do not discuss the case or come to any opinion
22 or conclusion.

23 We will adjourn a few minutes earlier.

24 (Recess was taken until 2 p.m. of the
25 same day.)
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14a

LOS ANGELES, CALIFORNIA, THURSDAY, AUGUST 12, 1971

2:00 P.M.

THE COURT: Now, gentlemen, we will go ahead.

People against Grogan. The defendant is here, both counsel are here.

If you will bring in the jury, Sheriff, we will move right along.

Now, will you please tell us your name again.

THE WITNESS: Paul Watkins.

THE COURT: You have been sworn. Pull your chair up so you can talk right into the telephone here.

(The following proceedings were had in open court in the presence of the jury:)

THE COURT: I believe the defendant was examining.

All the jurors are here and the alternates are here. Thank you.

Now, you may go ahead.

MR. WEEDMAN: Thank you.

PAUL WATKINS,

resumed the stand and testified further as follows:

CROSS-EXAMINATION (Continued)

BY MR. WEEDMAN:

Q Mr. Watkins, following this conversation on or about September the 7th, 1969, with Steve Grogan, you went

1 back up to Barker's Ranch, did you not?

2 A I did.

3 THE COURT: Keep your voice up. Talk in the phone there.
4 Pull it right up to your mouth.

5 Q BY MR. WEEDMAN: And you remained at Barker Ranch
6 for a period of time, did you not, and finally left for Las
7 Vegas for supplies?

8 A Yes.

9 Q Now, when you returned with the supplies, was Tom
10 Phillips with you?

11 A Yes.

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#2 15

1 Q Did you return in an automobile with these
2 supplies?

3 A Yes.

4 Q What kind of supplies did you bring back from
5 Vegas?

6 A Food and -- just basically food.

7 Q Who is Tom Phillips?

8 A He is a friend of Charlie's and is a friend of
9 mine.

10 Q What did Mr. Phillips do for a living, if you
11 know?

12 A He is -- works with leather. Makes leather
13 clothes, leather purses, leather things like that.

14 Q Was he working in Las Vegas, if you know, at about
15 the time that you returned with him to Barker Ranch with
16 these supplies?

17 A Yes. He was working in Las Vegas.

18 Q Did you ever know of a time when Tom Phillips
19 worked at Shoshone?

20 A No.

21 Q Was there any particular reason why Tom Phillips
22 accompanied you from Vegas with these supplies for Barker?

23 A Yes.

24 Q What was that?

25 A I asked him to.

26 Q Was there any particular reason why you asked him
27 to?

28 A 'Cause I didn't have a ride up there.

1 Q Was it his car that you used?

2 A No. But he had a friend who had a four-wheel-drive
3 vehicle, and that's what it took to get there.

4 Q So these supplies, I take it, were not for the
5 family, though; they were for Crockett and Brooks Poston as
6 well as the Berry brothers?

7 A No, they were for Brooks, Paul and I.

8 Q Brooks, Paul and you? I see. Just for the three
9 of you, yourself, Paul Crockett and Brooks Poston?

10 A Yes.

11 Q Did Tom Phillips understand the supplies were just
12 for the three of you?

13 MR. KATZ: Objection. Calling for a conclusion.

14 Your Honor, there is an objection. The objection
15 is that it calls for a conclusion.

16 THE COURT: Give me the question again.

17 (The question was read by the reporter
18 as follows:

19 "Q Did Tom Phillips understand the
20 supplies were just for the three of you?")

21 THE COURT: It will be conclusional. Sustained.

22 Q BY MR. WEEDMAN: Did you tell Tom Phillips that
23 you were going to the Barker Ranch with these supplies?

24 A Yes. He knew what was going on.

25 Q Did you tell him that the supplies were for your-
26 self, Brooks Poston and Paul Crockett?

27 A Yes.

28 Q Did he voice any objection to that?

1 A No.

2 Q As far as you know, was he on good terms with
3 Paul Crockett?

4 A Yes.

5 Q So far as you know, was he on good terms with
6 Brooks Poston?

7 A Yes.

8 Q Did you tell Tom Phillips that Steve Grogan had
9 told you that he had cut Shorty's head off?

10 A No.

11 Q Did you tell anyone, anyone who wasn't a police
12 officer?

13 A At that time had I?

14 Q Well, did you tell anyone during the month of
15 September, 1969, first of all, about this conversation that you
16 have told us about with my client?

17 A No.

18 Q Did you tell anyone during October of 1969 about
19 this conversation, that is, other than police officers?

20 A No.

16 fls

16-1

1 Q Did you tell Paul Crockett about it when you
2 returned to Barker Ranch after September the 7th?

3 A No.

4 Q Did you tell Brooks Poston about it?

5 A No.

6 Q Was one of the reasons you went back to Spahn Ranch
7 in September to get money?

8 A In '70?

9 MR. KATZ: Excuse me, your Honor.

10 Q BY MR. WEEDMAN: September 1969.

11 MR. KATZ: No objection.

12 THE COURT: Is there an objection?

13 MR. KATZ: No. I withdraw it.

14 THE WITNESS: I don't even recall the trip. In September?
15 No, it sure wasn't.

16 Q BY MR. WEEDMAN: It was not to get money?

17 A No.

18 Q And I believe you told us earlier that you went out
19 there just to see the folks at Spahn.

20 A Uh-huh.

21 Q And you just wanted to see how they were getting
22 along?

23 A Yes.

24 Q Did they regard you as a member of the family at
25 that time?

26 MR. KATZ: Excuse me. I will object on the ground it
27 calls for a conclusion.

28 THE COURT: I think so.

16-2

1 Read the question, please.

2 (The question was read by the reporter
3 as follows:

4 "Q Did they regard you as a member
5 of the family at that time?"

6 THE COURT: "Did they regard you?"

7 The question is basically conclusional. However,
8 the defense related a long series of associations in there.
9 I think maybe there is a foundation set up, at least for the
10 consideration, one way or the other, of the jury.

11 You can answer the question. Is the question clear?

12 THE WITNESS: Yes, the question is clear.

13 THE COURT: All right.

14 THE WITNESS: I don't know what they regarded.

15 Q BY MR. WEEDMAN: When had you last seen Steve
16 Grogan prior to the September 7th conversation with him?

17 A When I came down in August.

18 Q And when was that in August?

19 A When was that?

20 Q In August, yes.

21 A The beginning of the month, the very beginning of
22 the month.

23 Q Did you have any conversation with him at that
24 time?

25 A Yes.

26 Q Where did that conversation take place?

27 A Most of it took place in the -- at the ranch.

28 Q At Spahn Ranch?

16-3

1 A Yes.

2 Q Where was Charles Manson at this time, if you
3 know?

4 A He was at the ranch.

5 Q So you saw Charles Manson as well as Steve Grogan
6 in early August at Spahn Ranch, is that correct?

7 A Yes.

8 Q How did the family treat you at that time, that
9 is, in early August when you went back to Spahn Ranch?

10 A Well, they didn't -- they didn't know where I was
11 at. Like one day all of a sudden I was gone and they didn't
12 see me until early August. So they hadn't seen me in a month,
13 and I didn't say nothing. I just got on my motorcycle and
14 split, and so they regarded me with -- they wanted to know where
15 I went.

16 Q Did you tell them?

17 A Yes.

18 Q Did you tell them that you were through with the
19 family?

20 A No.

21 Q Were you through with the family at that time?

22 A No.

23 Q Now we are talking about the August following the
24 May that you left the family, are we not?

25 A Yes.

26 Q Of course, I believe you told us that you left in
27 the latter part of May and you didn't really tell anyone where
28 you were going, is that right?

1 A Correct.

2 Q Had you seen any members of the family during the
3 period of the latter part of May to the early part of August?

4 A No.

5 Q How did you act towards the family when you saw
6 them at Spahn's the early part of August?

7 A I got out of my car and I was greeted by everyone
8 that was there when I had left and a few others that weren't
9 there when I left, some new people. Everyone was glad to see
10 me and I was glad to see everyone else.

11 Q Did you see Shorty Shea at that time?

12 A No.

13 Q Did you see Frank Retz at that time?

14 A No.

15 Q Did you see Ruby Pearl at that time?

16 A Yes.

17 Q Did you see George Spahn at that time?

18 A Yes.

19 Q How long were you there with the family, or at
20 least at Spahn Ranch, in early August 1969?

21 A About five hours.

#17

1 Q And what was the reason for going to Spahn Ranch
2 on that occasion again?

3 A Just to say hello.

4 Q Did you tell anyone at Spahn Ranch that you no
5 longer regarded yourself as a member of the family?

6 A Not in those words, as such. But I did make that
7 clear with my visit.

8 Q Now, following that August visit of several hours
9 at Spahn Ranch, I take it that you did not see Steve Grogan
10 again until September 7th when you had the conversation with
11 him, is that correct?

12 A Yeah.

13 Q Now, you say you made it clear by your visit to
14 Spahn Ranch in early August that you were no longer a member
15 of the family, is that correct?

16 A Well, I didn't turn in my membership card 'cause
17 I never had one.

18 Q I understand.

19 A Never was one.

20 But by my actions and just the way I was, I made it
21 clear that I was doing my own thing.

22 Q Did you have any conversations with Steve Grogan
23 in September about the fact that you no longer regarded yourself
24 as a member of the family?

25 A No.

26 Q We touched on this once before, but did Charles
27 Manson ever tell you to quit following him around, that he
28 was not your father?

1 MR. KATZ: Objection, asked and answered, your Honor.

2 (Short pause.)

3 MR. KATZ: Your Honor, I have no objection.

4 THE COURT: Well, I am thinking. I am sorry.

5 MR. KATZ: Yes.

6 THE COURT: You have got a question there.

7 MR. KATZ: I can withdraw my objection.

8 THE COURT: You withdraw it?

9 MR. KATZ: Yes. No problem.

10 THE COURT: All right. That ends the argument. Stops
11 my disturbment.

12 MR. KATZ: Thank you, your Honor.

13 THE COURT: All right.

14 Answer the question.

15 THE WITNESS: Yes.

16 MR. WEEDMAN: I forgot what the question was.

17 I am sorry, your Honor.

18 Q Tell us what he told you in that respect.

19 A In that respect?

20 Q Yeah.

21 A Well, he used to say that quite often to everyone.

22 And as a matter of fact, he used to get rather uptight because
23 every time like, say, there would be a bunch of people sitting
24 around and relaxed and calm, and then if he came in the room
25 everyone got on the point.

26 Q Are you telling us he didn't like that, or he did
27 like that?

28 A He used to express that he didn't like that, but--

1 Q Excuse me. Go on.

2 A It was his creation. If he didn't like it, that's
3 the way it was.

4 Q Did he ever tell you that you were a little boy
5 who has been looking for his father?

6 A Yeah, he told me that.

7 Q Did you resent his telling you that, Paul?

8 A Well, at first I used to resent it. But then I
9 started looking at it.

10 And the more I looked at it, the more I saw that
11 it was true.

12 So I took off and left the whole scene completely.

13 Q You feel you're still a little boy looking for your
14 father?

15 A No.

16 Q You think you found such a father in Paul
17 Crockett?

18 A No, I found a father in myself.

19 Q You indicated, I believe, that you went to the
20 ranch on one occasion, that is, to Barker Ranch with someone
21 name Liz.

22 A That I did what at the Barker Ranch with her?

23 Q That you went to the Barker Ranch with someone
24 called Liz.

25 A I didn't indicate no such thing.

26 Q I'm sorry. Then I misunderstood.

27 You mentioned, however, someone named Liz, I
28 believe. Who is Liz?

1 A Liz is a young girl.

2 Q What is her last name?

3 A I don't know.

4 Q Does Liz Freeley refresh your memory with
5 respect to at least what she was called?

6 A Yes.

7 Q Is that the same Liz you are talking about, Liz
8 Freeley?

9 A Yes.

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1 Q Did you know her also as Liz Morehead?

2 A No.

3 Q Moreland. I'm sorry.

4 A No.

5 Q Moreland. Was there any reason particularly why
6 you didn't tell Brooks Poston or Paul Crockett about this
7 conversation that you told us at least that you had with Steve
8 Grogan about chopping Shorty's head off?

9 MR. KATZ: Excuse me. I'm going to object on the ground
10 it assumes facts not in evidence. Counsel restricted the
11 scope of his questions to September of 1969, and there has
12 been no question pending concerning whether or not he discussed
13 this fact with Mr. Poston and Mr. Crockett at some other time.

14 THE COURT: Read the question again, Mr. Reporter.

15 MR. WEEDMAN: Counsel is correct, your Honor, as far as
16 it goes.

17 THE COURT: All right. Withdrawn?

18 MR. WEEDMAN: It is true, your Honor, I have only talked
19 about September.

20 Q Is there any particular reason why you didn't tell
21 Brooks Poston or Paul Crockett about this conversation you told
22 us about with Steve Grogan in September of 1969?

23 A Yes, there is a reason.

24 Q What was the reason?

25 A The same reason I didn't ask Clem any more
26 questions about it, the same reason I didn't say "Why? Where
27 did you bury the body? Where this and why that?", because I
28 didn't really want to know and I didn't figure they really

18-2

1 wanted to know. They didn't ask me.

2 Q Now, when you had an interview with Sgt. Paul
3 Whiteley of the Los Angeles Sheriff's Department, do you know
4 whether or not that interview was tape-recorded in any way?

5 A With Paul Whiteley?

6 Q Yes.

7 A In Independence?

8 Q Is that where it took place?

9 A Yes.

10 Q Yes. Was it tape-recorded in any way?

11 A I don't believe so.

12 Q Did you sign any statements of any kind?

13 A No.

14 Q Given to any police officers?

15 A No. I didn't sign any statements.

16 Q Were any statements prepared for your signature
17 that you know of?

18 A No.

19 Q Finally, when you took this Army physical, did you
20 tell the Army doctors that you were crazy, or words to that
21 effect?

22 MR. KATZ: Your Honor, there is an objection on the
23 grounds it is immaterial and irrelevant.

24 THE COURT: I think so. Objection sustained.

25 Q BY MR. WEEDMAN: Did you indicate any unusual
26 mental state to these doctors during the course of your
27 physical examination?

28 MR. KATZ: Same objection.

1 THE COURT: Sustained.

2 MR. WEEDMAN: Your Honor, I would like to make some
3 record. Perhaps we can approach the bench.

4 THE COURT: All right. Step in chambers.

5 (The following proceedings were had
6 in chambers:)

7 THE COURT: We are in chambers. The defendant and counsel
8 are here.

9 Go ahead, Mr. Weedman.

10 MR. WEEDMAN: Your Honor, I just wanted, just for the
11 record, to urge that it should be admissible because it does
12 go to the mental competency of this young man. We are talking
13 about him taking a physical during the first week of
14 September, and it is immediately following that he tells us
15 he had this conversation with Steve Grogan, and I think it is
16 material.

17 If, for example, he would answer yes, he did tell
18 the doctors that he was crazy, or words to that effect, then I
19 think it would have some bearing on his credibility, your
20 Honor.

21 THE COURT: Wouldn't that be more to be elicited from
22 the doctor that gave the examination and said, "I examined
23 Watkins and his condition was such and such?"

24 MR. WEEDMAN: As long as, your Honor -- if you feel it is
25 material, then I submit that I should be able to prove it up
26 with any competent witness, and I think -- Watkins was there.

27 THE COURT: Watkins may say, "Well, I took the examina-
28 tion and there is something wrong with me mentally." That is

1 what you think he might say, something of that nature?

2 MR. WEEDMAN: Yes, your Honor.

3 THE COURT: And the reasoning from that being therefore
4 there could be something wrong with his mental reasoning at
5 the time of the alleged confession of Grogan to Watkins?

6 MR. WEEDMAN: Yes, your Honor.

7 THE COURT: That is your theory?

8 MR. WEEDMAN: Yes. Thank you. That is it exactly.

9 THE DEFENDANT: Not exactly. Can I add a few things?

10 THE COURT: No, wait a minute. Your counsel will speak.
11 Take it through your counsel.

12 THE DEFENDANT: It's hard because I'll ask him and it
13 doesn't come out the same as I would say it.

14 THE COURT: Do you want to say something?

15 MR. KATZ: Yes.

16 THE COURT: All right. What is your theory?

17 MR. KATZ: I think it is immaterial and irrelevant in
18 that any statement to be elicited from this witness would be
19 so possibly inflammatory that it would outweigh any probative
20 value. There is nothing here to indicate that there was
21 anything wrong with the person mentally.

22 If Mr. Weedman wants to ask a direct question,
23 whether or not he was incapable of successfully completing
24 the examination because of some mental defect, he can ask such
25 a question. But I don't want him going into any specific
26 things.

27 THE COURT: I think the statements of Watkins, no
28 question, would be hearsay. I think you could ask him, if you

1 want to:

2 "You took an examination a week before
3 this alleged statement from Mr. Grogan?

4 "Yes.

5 "Now, Mr. Watkins, at that time what was
6 your mental condition? Were you in possession
7 of yourself? Did you have mental problems,
8 mental aberrations or not.

9 "Yes, I did," or "No, I didn't."

10 That is what I think you could ask him, in that
11 fashion. Otherwise you are going into hearsay, what he said
12 to the man that gave the exam, and it is obviously hearsay.

#19

1 MR. WEEDMAN: Well, all right. Well, I will ask him,
2 then, what his mental state was.

3 THE COURT: I think you are then entitled to that
4 question.

5 MR. WEEDMAN: If he says no, his mental state was all
6 right --

7 THE COURT: That is a hazard, a gamble you take.

8 MR. WEEDMAN: Then I think I should be permitted to ask
9 him if it isn't true that he told the doctors he was crazy.

10 THE COURT: Now, wait.

11 MR. WEEDMAN: I have a good faith reason for asking this,
12 your Honor.

13 THE COURT: Well, but do you have a reason to follow
14 that up? Can you reasonably advise the court that you could
15 sustain that? That he did say such a thing?

16 MR. WEEDMAN: Yes. As a matter of fact, I am prepared
17 to offer, and it will be part of our defense, that during
18 this purported conversation with Clem --

19 THE COURT: With the doctor?

20 MR. WEEDMAN: No. We have two witnesses who will testify
21 that Watkins told them that Paul Crockett had coached him with
22 respect to how to beat the physical, that Crockett had told
23 him a manner in which to feign --

24 THE COURT: Told the witness Watkins?

25 MR. WEEDMAN: Yes.

26 -- lung trouble, and that Watkins by his own
27 statements to our witnesses, went to take the physical, and he
28 deliberately acted crazy.

1 THE COURT: Watkins did?

2 MR. WEEDMAN: Yes. In an effort to beat the physical,
3 if you will.

4 THE COURT: Who did Watkins tell that to?

5 MR. WEEDMAN: He told that to Mr. Grogan, and he told
6 that to Brenda McCann, otherwise known as Nancy Pitman, and
7 also to Squeaky, Lynn Fromme.

8 THE COURT: You can ask Watkins, "Did you tell Grogan" --
9 and who is the other man?

10 MR. WEEDMAN: Two other girls.

11 THE COURT: All right.

12 MR. WEEDMAN: Lynn Fromme and Nancy Pitman, Brenda McCann.

13 THE COURT: "On such and such a date did you tell them
14 that you were disturbed mentally at the time you took the
15 physical?"

16 I think you probably could ask that question.

17 If he tells you, "I was in good shape mentally
18 when I took the examination," --

19 MR. WEEDMAN: Yes, your Honor.

20 THE COURT: Get your question in. If he says, "I was
21 in good shape, my mind was clear, nothing wrong."

22 "All right, isn't it true that you told these people
23 otherwise?"

24 MR. WEEDMAN: Otherwise.

25 THE COURT: "Such and such a day that when you took the
26 examination you were sick mentally?" Whatever it is.

27 I then think you would be entitled to that.

28 What is the relationship between the date of the

1 physical and the date of the alleged statements to Grogan?

2 MR. WEEDMAN: About two days later.

3 THE COURT: I think it is a matter you should be entitled
4 to do.

5 You want to be heard on it?

6 MR. KATZ: No, your Honor.

7 THE COURT: All right.

8 (The following proceedings took place in
9 open court outside the presence of the
10 jury.)

11 THE COURT: Now, gentlemen, we are back in court. People
12 against Grogan. Counsel are here. Bring in the jury, will
13 you, Sheriff, please.

14 THE BAILIFF: Yes, sir.

15 (The following proceedings were in open
16 court in the presence of the jury.)

17 THE COURT: Now, we have all the regular plus the alternate
18 jurors.

19 You may go ahead.

20 Q BY MR. WEEDMAN: Mr. Watkins, what was your mental
21 condition when you were examined as part of your --

22 THE COURT: Now, may I interrupt one moment.

23 MR. WEEDMAN: Yes, your Honor.

24 THE COURT: Not trying to disrupt you.

25 MR. WEEDMAN: Yes, your Honor.

26 THE COURT: Would you set the date, the date of the
27 physical? The alleged date of the examination you are going
28 to speak of.

MR. WEEDMAN: Yes.

Q When did you take your army physical, Mr. Watkins?

A September 3rd.

19A

1-A

1 THE COURT: Of what year?

2 THE WITNESS: 1970, as near as I recall.

3 Q BY MR. WEEDMAN: 1970?

4 A No. 1969.

5 Q All right.

6 And so then it was approximately four days after
7 that that you had this conversation that you have testified
8 to with Steve Grogan?

9 A Yes.

10 Q What was your mental condition at the time you took
11 your army physical, Mr. Watkins?

12 A What was my mental condition?

13 Q Yes.

14 A Normal. Just the way I normally was.

15 Q Okay. As far as you were concerned, was there
16 anything wrong with you mentally at the time you took your army
17 physical?

18 A No.

19 Q Didn't you feign, that is, pretend to be mentally
20 ill during the course of that physical examination?

21 MR. KATZ: Excuse me, your Honor. There is an objection
22 only on the grounds of the ambiguous phrase, "mentally ill."

23 We haven't defined that so any answer to that
24 would be ambiguous.

25 THE COURT: You have an objection in?

26 MR. KATZ: Yes.

27 THE COURT: Read the question, please.

28 (The question was read by the reporter

1 as follows:

2 "Q Didn't you feign, that is, pretend
3 to be mentally ill during the course of that
4 physical examination?"

5 THE COURT: You may answer the question.

6 THE WITNESS: No.

7 Q BY MR. WEEDMAN: Did you ever tell my client, Steve
8 Grogan, after September 3rd, that you had acted crazy, or words
9 to that effect, in front of the army doctors?

10 A I wouldn't -- I didn't use those words.

11 I will tell you the words to that effect.

12 Q All right.

13 Well, I am just saying to that effect. Tell us
14 what you did say.

15 A I told the truth about myself.

16 Q What was it?

17 A And they would generally figure I was pretty crazy.

18 I told about my past and some of the thoughts that
19 I think, and the thoughts that I had thought and some of the
20 things I had been through, and just answered the psychiatrist's
21 questions.

22 And they didn't tell -- I didn't tell them I was
23 crazy.

24 They told me I was crazy.

25 MR. WEEDMAN: All right, Mr. Watkins.

26 That's all I have. Thank you.

27 THE COURT: Is that all, gentlemen?

28 MR. KATZ: No, it isn't, your Honor. I have quite a bit

1 of redirect.

2 THE COURT: Redirect?

3 MR. KATZ: Yes.

4 THE COURT: All right.

5
6 REDIRECT EXAMINATION

7 BY MR. KATZ:

8 Q Paul, once again we are back to the right-hand side
9 of the table at least as we look towards his Honor.

10 You were telling Mr. Weedman about Charlie's
11 espousing helter-skelter around the winter, or December of 1968.

12 I want to direct your attention to that part of
13 the period in December just prior to New Year's when Charlie
14 returned to Barker Ranch. Do you have that in mind?

15 THE COURT: Now, you are speaking of December of '58?

16 MR. KATZ: 1968, your Honor. December of 1968.

17 Q Do you have that in mind?

18 THE COURT: I mean to say '68.

19 MR. KATZ: '68.

20 THE COURT: That is what I want to get at.

21 THE WITNESS: Just before --

22 THE COURT: Just a minute.

23 All right, go ahead.

24 MR. KATZ: Thank you.

25 Q Am I correct in saying that just before New Year's
26 Charlie returned to Barker Ranch, where you were?

27 A It was New Year's Eve.

28 Q All right.

1 And I believe you told Mr. Weedman that Charlie
2 started rapping about a white Beatles album, is that correct?

3 A That's correct.

4 Q Was that the first time Charlie started to talk
5 about the white Beatles album and its significance insofar as
6 helter-skelter?

7 A That is the first time he started to talk about it
8 at all.

9 Q I want you to start at the very beginning and tell
10 us what Manson said about helter-skelter at that point when
11 he was discussing the Beatles.

12 A Well, he said, "Are you hip"--

13 THE COURT: Let's set our date, please.

14 MR. KATZ: This is December, New Year's.

15 THE COURT: Well --

16 THE WITNESS: New Year's.

17 THE COURT: Wait a minute. Set the date of the conversa-
18 tion now, so we will have it clear again.

19 MR. KATZ: All right.

20 Q Will you please tell us the date of the conversa-
21 tion.

22 A New Year's of 1968-69.

23 THE COURT: '68 coming into '69?

24 THE WITNESS: '68 coming into '69.

25 THE COURT: Is that right? All right, go ahead.

26 THE WITNESS: He asked us if we had heard the Beatle
27 album. Those of us who were in Los Angeles when he wasn't there.
28 And said, "Yeah."

1 And he said, "Are you hip to what the Beatles are
2 saying?"

3 And said, "No."

4 So he proceeded to tell us what the Beatles were
5 saying. And he said, "Did you -- are you aware of the song,
6 Helter-Skelter? Did you hear that, or are you aware of it?

7 "Are you aware of what they are saying?"

8 And I thought back and the words were "Helter-
9 skelter. It's coming down fast." And a few other words.

10 And so he began to interpret it and say that helter-
11 skelter meant that the Beatles were prophesying a revolution
12 which was on the brink of happening.

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1 Q Between whom?

2 A Between everyone; a complete apocalypse-type
3 revolution to where -- particularly between the blacks and
4 the whites, but that all the races would wind up being in it.

5 THE COURT: Let me get this.

6 Is this just supposed to happen -- did he say this
7 was to happen in the United States or all over the world?
8 Did he limit it? Or what was it?

9 THE WITNESS: Supposed to happen all over the world.

10 THE COURT: Everywhere, is that it?

11 THE WITNESS: Yes, that is it.

12 THE COURT: All right. Go ahead.

13 THE WITNESS: As I understood it.

14 Q BY MR. KATZ: What else did Charlie say at this
15 time? We are talking about New Year's Eve of 1968 and New
16 Year's of 1969.

17 A He said they were laying down a lot of heavy stuff
18 and it really blew his mind and that the Beatles, which is
19 holes in the infinite, and God was talking through them.

20 THE COURT: To Charlie, right?

21 THE WITNESS: To the whole world.

22 Q BY MR. KATZ: That is Charlie Manson?

23 THE COURT: Well, all right. I understood it was a
24 conversation or talking of God to Charlie. Is that right?

25 THE WITNESS: Yes. Well, Charlie is the one who is
26 telling me this, yes, but supposedly it was not just talking to
27 him, it was talking to whoever listened.

28 THE COURT: I'm lost on it, then.

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1 Charlie was telling you -- let's try it from the
2 beginning.

3 What was Charlie telling you about God talking to
4 him? What did he say?

5 THE WITNESS: He said that through the Beatles, the
6 infinite, or God, was prophesizing or telling him, telling
7 everyone, that there was a revolution.

8 THE COURT: Telling everyone?

9 THE WITNESS: Yes; everyone who had the awareness to see
10 it, that there was a revolution about to take place, and that
11 it was -- then he began to say how it would be and began to
12 interpret all kinds of parts of the album. He didn't really
13 talk too much about it that particular evening.

14 Q BY MR. KATZ: All right. In any event, that was
15 the first time that Charles Manson had discussed this concept
16 of helter-skelter in connection with the white Beatle album,
17 is that correct?

18 A That is correct.

19 Q You told us that around January 15 of 1969 you
20 moved to the Gresham Street address, is that correct?

21 A Yes.

22 Q Now, at Gresham Street did Charlie start to
23 embellish on that theory of helter-skelter and develop it
24 further in the context of the family and the family life?

25 A Yes.

26 Q Will you tell us what Charlie discussed in terms
27 of helter-skelter with the family in the family just following
28 January 15, 1969, when you were residing at the Gresham Street

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1 house with the family.

2 A All right.

3 Well, you are going to have to understand as I'm
4 talking that this picture which I'm painting for you in this
5 short time -- what I'm telling you is something that it took
6 Charlie months to tell us. In other words, he would add a
7 little bit every day. There is a little bit more came through
8 and he would say more. In other words, I'm telling you
9 something that he told us over a period of months. He
10 wouldn't sit down all in one night and say what I'm sitting
11 down and saying.

12 Q All right. I want to direct your attention to the
13 time period in which you stayed at the Gresham Street house.

14 A Okay.

15 Q Now, over that entire period of time -- and I
16 believe you said it was from around January 15, 1969, till
17 the spring of '69; is that correct?

18 A Yes.

19 Q All right. Tell us in this time period what he
20 discussed with the family insofar as it concerns helter-skelter
21 and the future course of the family life.

22 A Well, first he said how it would start. The way
23 he said it would start would be that the blacks were getting
24 more and more uptight, mad at what was going on, so they
25 would rise up and kill a bunch of whites -- just go in and
26 do some really vicious murders up in the rich districts of
27 town.

28 As a matter of fact, in the Gresham Street house

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1 he talked about in the Bel Air district; that there would be
2 some really vicious murders in which the bodies would be
3 chopped up and little boys would be all cut up and whole
4 families would be chopped up in little pieces.

5 Then this would incur the wrath of the white
6 people and they would go into Watts with guns and shoot all
7 the Uncle Tom niggers -- is what he called them -- the
8 garbagemen and all the ones who catered to the white man.

9 So then he would have missed the true Negro, is
10 what he said, who proved to be the Black Muslim, and the
11 Black Muslim would come in front of the people through the
12 media of television and say "Look what you have done to my
13 people," and then that would split the white man in half or
14 into different factions and they would all begin to fight
15 amongst themselves -- this one over here being pro-black and
16 this one over here being anti this group and anti that group,
17 and they would all be fighting and the fighting would be
18 happening in the streets, everyone killing everyone else,
19 and then whoever was left over --

20 THE COURT: After the killing?

21 THE WITNESS: After the killing, whoever was left, then
22 the Black Muslims would come up out of hiding and slaughter
23 all the rest.

24 Q BY MR. KATZ: That would include those whites who
25 had survived?

26 A Those whites who had survived. Any race that had
27 survived, besides any blacks, because he said -- because the
28 white man was on top and the black man was on the bottom, that

1 things were going to reverse, go completely opposite, so that
2 the black man would be on top and the white man would be on
3 the bottom.

4 That all made sense to me. I just ate it up like
5 it was good stuff.

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Q All right. Go on.

A At first, and then there was no -- all we were going to do, we were going to --

THE COURT: By "we" you mean the family?

THE WITNESS: The family, yes.

THE COURT: What was the family going to do?

THE WITNESS: We wasn't going to get killed. We was going to get out of it. We were going to take off and go to the desert.

THE COURT: That is the Spahn Ranch, you mean?

THE WITNESS: The Barker Ranch.

THE COURT: The Barker Ranch?

THE WITNESS: And we was going to find a hole, which the Revelation, the Ninth Book, the Ninth Chapter of the Revelations is supposed to be about helter-skelter, according to Charlie. The Beatles are supposed to have been --

Q BY MR. KATZ: That is the New Testament you are referring to?

A The New Testament, yes. The Revelations is the last book of the Testament.

THE COURT: You mean that Charlie was quoting this to you?

THE WITNESS: Yes.

THE COURT: The scriptures? Quoting from the bible to you?

THE WITNESS: Yes.

THE COURT: Go on now.

THE WITNESS: The Beatles were supposed to have been

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1 four-headed locust in the Ninth Chapter of Revelations.

2 THE COURT: Was he reading this out of the bible to
3 you?

4 THE WITNESS: Yes.

5 THE COURT: Go on.

6 THE WITNESS: And then later in that Ninth Chapter it
7 speaks of the pit, and Charlie said this was a hole that
8 existed in Death Valley. He got quite elaborate about that
9 deal, about living in a hole. We were supposed to live in
10 this hole while the revolution went on so that there would be
11 a white race preserved on the planet, because then after the
12 revolution was over, which was supposed to take 50 years, we
13 were supposed to emerge from this hole, and then the black man
14 would have had his fill of killing, and Charlie would scratch
15 him on his fuzzy head, kick him in the butt, and tell him to
16 go pick cotton.

17 Q BY MR. KATZ: Did Charlie say that or are you
18 saying that?

19 A Charlie said that.

20 Q These are his words?

21 A Yes.

22 And then we would live happily ever after.

23 THE COURT: Now, I'm having a little difficulty follow-
24 ing the reasoning here.

25 Let's get back up a little bit.

26 Charlie tells you that reading in the Book of
27 Revelations, in the bible, as I get it, there is a hole in
28 Death Valley? Is that it, a hole in the valley up there

1 where the Barker Ranch is?

2 THE WITNESS: A cave-like hole, a great big cavern.

3 THE COURT: And the family is to go to this hole and
4 live?

5 THE WITNESS: Yes.

6 THE COURT: Is that correct?

7 THE WITNESS: Yes.

8 THE COURT: Then there is a revolution that is going to
9 last about 50 years, did you say?

10 THE WITNESS: Yes.

11 THE COURT: During which people are just killing each
12 other all the time?

13 THE WITNESS: Yes.

14 THE COURT: Is that right? You tell me if I'm wrong.

15 THE WITNESS: You've got it straight so far.

16 THE COURT: Then at the end of 50 years, who is going to
17 be left alive under his theory now?

18 THE WITNESS: At the end of 50 years the blacks would
19 have killed all the remaining white people and all the remaining
20 races in between black and white.

21 THE COURT: Now, wait.

22 THE WITNESS: Leaving nothing left but black people.

23 THE COURT: All right. At the end of the 50 years, all
24 the white people would be killed, is that right?

25 THE WITNESS: That's right, according to --

26 THE COURT: And the black people -- would there be any
27 black people left?

28 THE WITNESS: Yes.

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THE COURT: There would be?

THE WITNESS: Yes.

THE COURT: Now, what was Charlie's plan at that point?

THE WITNESS: To come back up out of the hole.

THE COURT: This is at the end of 50 years?

THE WITNESS: Yes.

THE COURT: Now, he has been in the hole 50 years, is that right?

THE WITNESS: Yes.

THE COURT: I'm talking fact, is that right?

THE WITNESS: That's right.

THE COURT: The family is to be in the hole with Charlie for 50 years; right?

THE WITNESS: Right.

THE COURT: The fighting is going on; right?

THE WITNESS: Right.

THE COURT: At the end of 50 years, all the white people would be dead; right?

THE WITNESS: Right.

THE COURT: Then Charlie comes out of the hole, is that right?

THE WITNESS: Right.

THE COURT: With the family?

THE WITNESS: Right.

THE COURT: Now, what does Charlie do at that point under his plan?

THE WITNESS: Then supposedly the black man will be filled with, according to Charlie, the way it was told to me --

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1 THE COURT: Talk out to the people, too.

2 THE WITNESS: The black man was supposedly to be filled
3 with remorse for all this killing.

4 THE COURT: Remorse for killing the white man?

5 THE WITNESS: Right. And so he is to look at Charlie
6 and Charlie is going to say, "I forgive you," and kick him in
7 the butt and scratch him on his fuzzy head and tell him to go
8 pick the cotton and take his part of being the servant. And
9 then --

10 THE COURT: Well, now --

11 THE WITNESS: -- Charlie would set up his kingdom,
12 according to the prophesy of the Revelations.

13 THE COURT: Wait a minute.

14 THE WITNESS: Which is the second coming of Christ.

15 THE COURT: Wait a minute. I'm catching up with you
16 here.

17 THE WITNESS: Okay.

18 THE COURT: We've got Charlie and the clan, the war is
19 over, Charlie has come out of the hole. Now, the white people
20 are all supposed to be dead, is that right? Is that it?

21 THE WITNESS: Yes.

22 THE COURT: All right. Now, Charlie at that time is
23 going to set himself up as a kingdom? Is that what you're
24 saying?

25 THE WITNESS: Yes.

26 THE COURT: Who was going to be in the kingdom?

27 THE WITNESS: The family during that time would have
28 grown to be 144,000 strong.

1. THE COURT: Well, the kingdom would consist of the
2 family?

3 THE WITNESS: Yes.

4 THE COURT: And who else?

5 THE WITNESS: No one else; just the family.

6 THE COURT: That is the kingdom?

7 THE WITNESS: Yes.

8 THE COURT: Right?

9 THE WITNESS: Yes, of 144,000. The family, according to
10 the prophesy, is supposed to have grown by that time.

11 THE COURT: Now, the prophesy. What prophesy? You mean
12 the prophesy in the Revelations or the prophesy that Charlie
13 is making?

14 THE WITNESS: The prophesy that Charlie made according
15 to the Revelation.

16 In other words, he got the number 144,000
17 from the Revelations.

21

1 THE COURT: Yes.

2 THE WITNESS: So if, like I say according to the prophecy,
3 would go to how Charlie prophesied it to me.

4 THE COURT: Is it Charlie's theory that he is figured
5 right in the Book of Revelation? Is that what he is telling
6 you?

7 THE WITNESS: Yes. That's him they are talking about.

8 THE COURT: Where is he in the Book of Revelation there?

9 THE WITNESS: He is in Chapter 10, is where he comes.

10 THE COURT: What is the chapter and verse?

11 THE WITNESS: I don't know what verse it is, but it's --

12 THE COURT: Let's get the chapter again. What is the
13 chapter?

14 THE WITNESS: 10th Chapter.

15 THE COURT: All right.

16 You don't know the verse?

17 THE WITNESS: No.

18 THE COURT: What does it say about Charlie at that point?

19 THE WITNESS: I don't remember exactly the verse or the
20 words of the verse, but it said something about the -- some
21 angel, the tenth angel, or the eleventh angel.

22 That's where he comes down. And I don't -- if you
23 got a Bible, I will read it to you.

24 THE COURT: Well, --

25 THE WITNESS: But I don't know.

26 THE COURT: I don't want to be facetious but does Charlie
27 say it refers directly to him at that point, is that it?

28 THE WITNESS: Yes.

1 THE COURT: Of course it can't mention the word "Charlie."
2 It must say something else there, is that right?

3 THE WITNESS: No, it doesn't say Charlie, no.

4 THE COURT: What does it say, that is what I am getting
5 at.

6 THE WITNESS: I don't know. It says the tenth angel,
7 or the eleventh angel, or something like that there.

8 THE COURT: Is that Charlie?

9 MR. KATZ: Well, excuse me, your Honor.

10 THE WITNESS: According to my understanding, sir, that's
11 the way it is. I understand it.

12 THE COURT: The angel is Charlie?

13 THE WITNESS: Yes.

14 That's the way I -- that's the way Charlie told it
15 to me. According to the way I understood what he said.

16 THE COURT: That he was the angel referred to in the
17 tenth chapter?

18 THE WITNESS: Yes.

19 THE COURT: Is that right?

20 THE WITNESS: Yes. That's right.

21 THE COURT: If I mislead you or misstate it, you correct
22 me.

23 THE WITNESS: No. That's correct.

24 THE COURT: All right. Go ahead.

25 MR. KATZ: May I continue? Thank you, your Honor.

26 Q All right.

27 Now, so I understand it at this point at Gresham
28 Street he was preparing the family to repair themselves

1 to the desert to await the coming of the revolution, is that
2 correct?

3 A Yeah. He was -- we were doing many things at that
4 point.

5 Q Well, but what I want to understand is, was it part
6 of Charlie's philosophy in discussion with the entire family
7 that the family would have to repair to some place in the
8 desert where they would await the coming of the revolution?

9 A Well, I don't know if we were going to wait for
10 the -- that wasn't straight to me if we were going to wait for
11 it to start there, or if we were going to wait till it started
12 and go there.

13 Pretty soon it got so that I believed it so whole-
14 heartedly that I would look out and see what the nearest way to
15 the desert was all the time.

16 Q All right.

17 Now, in this connection did Charlie start discussing
18 the importance of the desert and in particular, Death Valley,
19 the use of Death Valley?

20 A Yes.

21 Q What did he say in that regard at Gresham Street?

22 A Well, at that point we bought three hundred dollars'
23 worth of maps of the desert from -- from Los Angeles to way
24 into Nevada, around Las Vegas to up north above -- way above
25 Death Valley up into the desert around and down into the
26 southern desert around the Mexican border.

27 We bought all these maps and we began studying the
28 desert.

1 THE COURT: What were you studying for?

2 THE WITNESS: We were looking for the hole, to tell you
3 the truth, and we was looking for --

4 THE COURT: That is where you were going to go to?

5 THE WITNESS: Yeah. And we was plotting a road.

6 THE COURT: Did you know where to look for the hole, or
7 just looking at the whole map of the country there?

8 THE WITNESS: We didn't know where to look for the hole.
9 I didn't.

10 MR. KATZ: All right.

11 Q In any event, did Charlie indicate by studying these
12 maps that the family might be able to ascertain this hole
13 through which they would enter into, during the revolution;
14 is that correct?

15 A Yeah.

16 Q Was there supposed to be some type of subterranean
17 place beneath the earth's surface where the family would be in
18 safety during the revolution?

19 A Yeah. Well, in the Revelation it says that there
20 will be a city. There is a -- I believe the lines go like
21 this:

22 "There will be a city in which there will
23 be no sun and there will be no moon. Yet there
24 will be light."

25 THE COURT: That is where you are going? That is where
26 you were going to go?

27 THE WITNESS: Yes.

28 And then that it was to be a city of gold.

1 It said, "There will be a city of gold."

2 Yes. And then that there was this fruit. A tree
3 that bear twelve different kinds of fruit that changed every
4 month.

5 Q BY MR. KATZ: All right.

6 Now, Paul, did Charlie in this connection discuss
7 the Beatles' songs, "Blackbird" and also "Yellow Submarine"?

8 A Yes.

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1 Q All right.

2 Tell us what he said in that regard with respect
3 to those two songs.

4 A "Blackbird" was supposedly the Beatles telling the
5 black man to start it. In other words, the lines go "Blackbird,
6 fly. You were only waiting for this moment to arrive."

7 And so Charlie said that that was the Beatles
8 telling Blackie to start it.

9 Q Start what?

10 A The revolution.

11 Q All right.

12 What about "Yellow Submarine"?

13 A The way I understood "Yellow Submarine" was -- really
14 weird.

15 I didn't understand what was supposed to be about
16 the "Yellow Submarine."

17 Q All right.

18 In any event, did Charlie discuss what specific
19 steps the family was expected to take in furtherance of their
20 object and design to get to the desert?

21 A Did what?

22 Q Let me reframe it.

23 Did Charlie discuss with you and the family while
24 you were at Gresham Street how you were supposed to get to the
25 desert?

26 MR. WEEDMAN: Your Honor, I wonder if we might approach
27 the bench for just a moment.

28 Forgive me for interrupting, but just a very brief

1 thing.

2 THE COURT: All right. Do you want the reporter?

3 MR. WEEDMAN: Yes.

4 (The following proceedings were had in
5 chambers out of the presence of the
6 jury.)

7 THE COURT: We are in chambers. Defendant and counsel.
8 Go ahead.

9 THE CLERK: Pardon me.

10 THE COURT: Yes. Give the jury a recess.

11 THE CLERK: All right.

12 MR. WEEDMAN: Your Honor, I asked permission to come
13 into chambers on this occasion because I am afraid that by
14 continuing to delve into helter-skelter, Mr. Watkins may
15 innocently enough, from his point of view, and certainly
16 innocently enough from Mr. Katz's point of view, launch into
17 the Tate-La Bianca case.

18 You know, helter-skelter played a very large part
19 in that case, to the best of my knowledge. I think Mr. Katz --
20 well, I shouldn't put any words in Mr. Katz's mouth.

21 THE COURT: Well, it may have been gone into pretty
22 thoroughly. Is there much more you want to bring out?

23 MR. KATZ: Yes, your Honor. But I want to say, your Honor,
24 in all due respect, my whole redirect was broken up because
25 I knew where I was going, and your Honor -- I know it was
26 sincere -- broke up my whole train of thought.

27 There is a point I want to make with this witness.
28 I can do it without any interruption.

1 I am not going into the Tate-La Bianca case at
2 all.

3 THE COURT: I think you have your right.

4 Make your objection.

5 But I do think the right is there.

6 MR. WEEDMAN: Just for the record, your Honor --

7 THE COURT: Yes.

8 MR. WEEDMAN: -- I will object to any further testimony
9 about helter-skelter on the ground that it is inherently very
10 prejudicial to my client because of all the talk about racial
11 prejudice. And we do have five black people on our jury.

12 And in that connection I would submit that the
13 only materiality of helter-skelter would naturally be to show
14 some motive for killing Shorty Shea.

15 And the motive there, apparently, could only be
16 the fact, as far as we know, that he was married to a black
17 girl.

18 And I would submit that the prejudicial value of
19 any additional testimony about helter-skelter would far out-
20 weigh any probative value as to motive here, since there is
21 apparently no connection at all between helter-skelter other
22 than by argument, of course, and the death of Shorty Shea.

23 And of course there presumably was a very strong
24 connection from the prosecution point of view between helter-
25 skelter and the Tate-La Bianca murders.

26 And I am really concerned that we are going to be
27 getting into that. Mr. Watkins absolutely, through no fault
28 of Mr. Katz, on a couple occasions really was so close to it

1 it made me very nervous, indeed.

2 THE COURT: At this juncture I would overrule the
3 objection.

4 I would suggest you don't go any further than you
5 have to, than you feel you have to.

6 I am not saying how I will rule on further
7 objections, but at this moment I will overrule the objection.

8 MR. KATZ: Well, I just want to say for the record I
9 will be able to establish from this witness that helter-skelter
10 was a motive for the Shorty killing. It did actually fit
11 within the framework of helter-skelter as such.

12 I'm not going to go into Tate-La Bianca. I am
13 going to instruct this witness during the recess to make no
14 references as such to the Tate and La Bianca killings.

15 THE COURT: Well, at this time I will overrule the
16 objection.

17 MR. KATZ: Thank you.

18 THE COURT: That is as far as I will go at this moment.

19 Let us take a short recess at this time.

20 MR. WEEDMAN: All right. Thank you, your Honor.

21 MR. KATZ: Thank you.

22 (Recess.)
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1 THE COURT: Let's proceed, gentlemen.

2 People against Grogan. The defendant and counsel
3 are here. The witness is on the stand.

4 State your name again.

5 THE WITNESS: Paul Watkins.

6 THE COURT: You have been sworn. Sit up straight so you
7 can talk right in the phone there.

8 Bring in the jury, please.

9 (The following proceedings were had
10 in open court in the presence of the
11 jury:)

12 THE COURT: Now we have all the jurors here and the
13 alternates.

14 You may proceed.

15 MR. KATZ: Thank you, your Honor.

16 Q Paul, as Charlie began to build this picture of
17 helter-skelter while you were at the Gresham Street address
18 piece by piece, did he discuss the role the family was to play
19 in preparation for the coming of the revolution?

20 A Yes.

21 Q What did he say the family was to do?

22 A Well, we got maps, and then we were to make music.

23 Q Would you please explain this to us? What were
24 you supposed to do in connection with the music? What was
25 the purpose for the music?

26 A The music was designed to start the revolution,
27 because, as I explained before, the only reason it supposedly
28 hadn't happened was that there was still young white girls in

22-2

1 San Francisco --

2 Q You mean in Haight-Asbury?

3 A In Haight-Asbury pacifying the frustration of the
4 blacks there.

5 So the music was designed to draw them from
6 San Francisco to the desert by programming them like you
7 program a computer.

8 Q Let's backtrack for a moment. You indicated,
9 according to Charlie, that the Negroes were pacified because
10 of the presence of white girls in Haight-Asbury, is that
11 correct?

12 A Yes.

13 Q In what connection do you mean this? How do you
14 mean this? How did Charlie mean this?

15 A How did I mean they pacified them?

16 Q Yes.

17 A By raping them and doing all the things that black
18 guys do to young white girls, supposedly, in Haight-Asbury.

19 I don't know. I have never been in Haight-Asbury
20 and seen any black guys doing anything to any white girls.

21 Q That is what Charlie had said and discussed with
22 the family, is that correct?

23 A Yes.

24 Q Now, with respect to these songs, were these songs
25 that you were to compose as a family?

26 A Yes.

27 Q All right. And what was the purpose for composing
28 these songs?

22-3

1 A To draw those people out of San Francisco.

2 Q Which people?

3 A The young love, as Charlie called them.

4 Q Who is the young love?

5 A Young girls and young guys who were living in
6 Haight-Asbury.

7 Q Where were they to go?

8 A To the desert.

9 Q They would be programmed by this music that was
10 composed by the family?

11 A Yes.

12 Q Now, earlier you told us that one of the things
13 you really dug about the family was the fact that they engaged
14 in music as such, and you being a musician, this appealed to
15 you; is that correct?

16 A Yes.

17 Q Now, at that time would you regard the music as
18 somewhat free-flowing and done for reasons of the musical
19 content itself without reference to any message?

20 A I know what you're saying and I did notice that the
21 music definitely had a message, and there was a lot different
22 message than the music we had played before, although I still
23 enjoyed making music just as much because to me music is
24 music.

25 Q But was there a purpose now that was attached to
26 the composition of music at the time period that you were at
27 Gresham?

28 A There was definitely a purpose for it. I have

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1 already stated such.

2 Q That is the purpose you told us about, just a
3 moment ago, is that correct?

4 A To start the revolution.

5 Q Now, Charlie prophesied that the revolution was
6 going to come, is that correct?

7 A Yes.

8 Q Then why was it, according to his philosophy, that
9 it was necessary to compose this music to program the girls to
10 leave Haight-Asbury if the revolution was coming down anyway?

11 A Well, because -- I don't know. I didn't think.

12 Q Did Charlie discuss this, though?

13 A No.

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1 Q Now, all right. In any event, he said it was now
2 necessary for the family to compose music for that purpose, is
3 that correct?

4 A Yes.

5 Q What else was the family to do, according to Charlie,
6 in preparation for the coming helter-skelter?

7 A Collect dune buggies and motorcycles, which we began
8 to do so. We started collecting dune buggies and motorcycle
9 parts by the ton, and guns and girls and everything necessary
10 for a trip to the desert.

11 Q All right. Now, in fulfilling this helter-skelter
12 and repairing safely to the desert area during the forthcoming
13 revolution, did Charlie talk about a base or a basis of inter-
14 mediate operation whereby you would gather facilities and the
15 like?

16 A Yes.

17 Q What did he say in this connection?

18 A Well, in other words, we were supposed to build a
19 road from the ocean -- according to the prophecy in the
20 Revelation, according to Charlie's interpretation thereof,
21 understood by me -- the road is supposed to start at the ocean
22 and go to the hole in the desert.

23 Now, the road was supposed to go through Spahn's
24 Ranch, and so one base of operations was up in the Santa Monica
25 Mountains where we had stolen VW's stashed in the bushes for
26 parts along the edge of the road so that if you broke down,
27 you could jump out and get the parts out of the VW's that were
28 sitting there, and go on. One base was supposed to be Spahn's

1 Ranch.

2 Q What was supposed to happen at Spahn's Ranch?

3 A That is where we were supposed to get all our
4 dune buggies together and get our motorcycle parts together
5 and these things.

6 Q Get any other supplies together?

7 A The guns together, the food together -- use that
8 as, say, a base camp on the edge of the city.

9 And then through the Fountains of the World, and
10 that was to be a different kind of an operation.

11 Q What was supposed to happen in connection with the
12 family at the Fountain of the World?

13 A Well, some of the girls, Sadie and Kitty and Ella,
14 went to the Fountains of the World to secure that area.

15 Q For what purpose?

16 A For the purpose of -- well, because it was founded
17 under the cross; in other words, it was a Christian organiza-
18 tion, supposedly, and that would be one of the last places to
19 go in the revolution. There would be no violence there until
20 the last moment, and because there were supposedly caverns,
21 underground rooms, underneath the Fountains of the World,
22 he was going to use it to stash the young love, as Charlie
23 called them, young love and babies, young girls and things
24 that in averse to Spahn's Ranch, where a different kind of
25 things -- where all the motorcycle guys were at a harder, a
26 more harder scene than the young love could tolerate. So
27 they had to go to the Fountain.

28 Q When you say that some of the young love or young

1 people would go to the fountain, do you mean that the
2 younger members of the family would be secreted for a period
3 of time at the Fountains of the World?

4 A No. It would be a place where you drew these
5 people out of the city, stashed them there and took them to
6 the desert from there.

7 Q I see. To join the family who would then be
8 residing in the subterranean city?

9 A Yes.

10 Q Now, as winter in 1969 grew into the spring of
11 1969, was there a difference in the intensity with which
12 Charles Manson and the family discussed the forthcoming
13 revolution?

14 A Was there a difference in the intensity in which
15 it was discussed? Yes.

16 Q Would you tell us about that.

17 A Well, it got more intense, and pretty soon it got
18 so that that is all that I and those around me, as I saw it,
19 that's all we lived there for, that is all we ever heard, was
20 revolution, helter-skelter. We were waiting every second for
21 it to start.

22 Q When you say "we," was the defendant among those
23 persons?

24 A As far as I could see.

25 Q He was with you during this period of time?

26 A Yes.

27 Q Now, when you returned to Spahn Ranch, I believe
28 you told us around, I believe, March of 1969, did the family

1 use Spahn's Ranch in any particular fashion insofar as it
2 concerned preparing for helter-skelter?

3 A Yes.

4 Q What did they do at Spahn Ranch in that period?
5 We are talking now roughly about the spring of 1969.

6 A Started stashing motorcycle parts there and dune
7 buggies, dune buggy parts, building dune buggies and getting
8 welding stuff together. Started getting things together.

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1 Q How about weapons?

2 A Got a -- we did have some weapons. A machine gun
3 I know of. And a pistol I knew of.

4 MR. WEEDMAN: Well, your Honor, I really think we are
5 getting rather far afield here. Unless there is some connec-
6 tion between all of this and Shorty Shea. That is what we are
7 talking about.

8 THE COURT: I will sustain your objection at this
9 juncture. Sustained to the last question.

10 I think it is covered at this point. Sustained.

11 MR. KATZ: All right.

12 Q Now, you told us that you became disenchanted with
13 the family in the latter part of the spring of 1969. Was this
14 because of the intensity of this helter-skelter?

15 A Yeah.

16 Q And was this what caused you to make the decision
17 to leave the family and go back to Barker Ranch?

18 A Yes. And all of a sudden it changed from -- from
19 it was -- first it was just something that was happening.
20 "The helter-skelter is coming down and it's happening."

21 And then it changed into something that we were
22 making happen. And I didn't like that too well.

23 Q Just so I understand you, Charlie had discussed
24 with the family that Spahn Ranch would be a base of operations
25 to gather various supplies pending your trip to the desert,
26 is that correct?

27 A Yes.

28 MR. KATZ: If I may have a moment, your Honor.

THE COURT: Yes, sir.

MR. KATZ: I may have concluded my examination.

Q Incidentally, you had told us that in response to one of Mr. Weedman's questions, that Paul Crockett had espoused a similar philosophy as that of Charles Manson.

Did you mean to say that Paul Crockett espoused the helter-skelter?

A No. I didn't mean to say that.

Q Did he?

A No.

Q What did you mean by the fact that Paul Crockett, according to you, had a similar philosophy in some areas as Charles Manson?

A I meant that Charlie had a background behind his philosophy in Scientology and that Paul knew Scientology also.

And in this way they had similar ideas.

Q But this Scientology -- excuse me.

Am I correct in saying that this Scientology had nothing to do with a revolution between the blacks and the whites?

A You are correct in saying that, yes.

Q Now, when you had this conversation with Clem concerning the killing of Shorty Shea around September 7th, 1969 was there any reason why you did not ask Clem why he had killed Shorty?

MR. WEEDMAN: Excuse me, your Honor. May we have the question. I am sorry.

THE COURT: Yes. Do you want to state an objection there?

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1 MR. WEEDMAN: No, your Honor.

2 THE COURT: All right.

3 (The question was read by the reporter
4 as follows:

5 "Q Now, when you had this conversation
6 with Clem concerning the killing of Shorty Shea
7 around September 7th, 1969 was there any reason
8 why you did not ask Clem why he had killed
9 Shorty?")

10 MR. WEEDMAN: Thank you, your Honor.

11 THE COURT: All right.

12 Q BY MR. KATZ: Paul, do you understand the question?

13 A Yes.

14 Q What is your answer to that?

15 A There was a reason.

16 Q What was the reason?

17 A I didn't want to know the answer. I didn't want
18 to know any more.

19 It was always -- somebody was always trying to tell
20 me about something like that. And I just didn't want to be
21 involved.

22 Q Now, I believe that you told us that you made a
23 decision to rejoin the family for a period of time, thus
24 leaving Paul Crockett and joining the remnants of the family
25 in 1970 during some period of time; is that correct?

26 A Yes.

27 Q And I think you told Mr. Weedman you did so because
28 you, yourself, wanted to know the truth about certain things,

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1 is that correct?

2 A Yes.

3 Q What truth did you have reference to?

4 A I couldn't believe that the accusations that were
5 made by the State was true.

6 I couldn't believe all the things I was hearing
7 was true.

8 I wanted to find out what was true and what was
9 really going on.

10 Q So when you -- strike that.

11 When was it that you rejoined the remnants of the
12 Manson family in 1970?

13 A In around the end of December.

14 Q All right.

15 Was Charlie in custody at that time?

16 A Yes.

17 Q And Katie Krenwinkel?

18 A Yes.

19 Q And Van Houten?

20 A Yes.

21 Q And Susan Atkins?

22 A Yes.

23 Q Tex Watson?

24 A Yes.

25 Q Who was there amongst the members of the family in
26 December of 1970?

27 A Squeaky and Sandy and Gypsy and Sue Bartell and
28 Kevin.

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1 Q Kevin is somebody that is new, is that right?

2 A Oh, yeah. The question was only those who were in
3 the family before.

4 Q Yes.

5 A Well then, that's it. That's three girls.

6 Q All right.

7 And tell us the additional members, the new members.

8 A Well, Brenda came along a little later. But she
9 was a member before.

10 Then there was additional people that came in, was
11 Lizzie and Kevin and some other guy named Danny. And that's
12 about it.

13 People came and went. But that's about the size of
14 it.

15 Q All right.

16 And where did you stay?

17 A At Spahn's Ranch and at a house on Chandler Street
18 in Van Nuys.

19 Q All right.

20 And did you stay with them also in January of 1970?

21 A Yes.

22 Q Well, I am a little bit confused. We have been
23 talking about December of 1970.

24 A Yes.

25 Q When was it that you rejoined the family?

26 A About December of 1970.

27 Q Well, I had asked you the question whether or not
28 you were with them in January of 1970.

1 A Oh. January is before December, huh. That's
2 right.

3 Excuse me.

4 Q Yeah. Can you answer that, were you with the
5 family in January of 1970?

6 A January is not before December. Don't excuse me.
7 January is definitely after December.

8 Q Well, if you are going from the previous year,
9 that's right. It depends on your frame of reference.

10 I am talking about the year 1970, that is, January
11 through December. Now, if you use it from that frame of
12 reference, when was it in 1970 that you rejoined them? Was
13 that before or after the fire that affected you?

14 A Before. There is only one January in 1970.

15 Q All right.

16 So that would be the fire happened sometime in
17 '70?

18 A Yeah.

19 Q All right.

20 So you were with the family then in January of
21 1970, is that correct?

22 A Yes.

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1 Q All right.

2 Now, did you notice a difference in the family
3 from before --

4 MR. WEEDMAN: Before --

5 MR. KATZ: I am going to clarify it.

6 Q When you first joined the family, was there a
7 difference?

8 A Between that and what?

9 Q Was there a difference between the atmosphere that
10 pervaded the family that was left in January, 1970, from the
11 family when you first joined it in 1968?

12 A Most definitely there was a difference.

13 Q All right.

14 And was there a difference between the atmosphere
15 which pervaded the family in the spring of 1969 and the
16 atmosphere that pervaded the family in January of 1970?

17 A Yes.

18 Q What was the difference?

19 A Well, in the spring of 1969 it was a -- is what
20 I have been talking about for the last hour or so.

21 Q The helter-skelter, right?

22 A Yes.

23 Q All right.

24 A And then later on there in January, 1970 it was
25 the -- the atmosphere that existed amongst the people there
26 was that of "Get everybody out of jail."

27 Everybody else was in jail. So it was work, and
28 everybody was working on getting everyone else out of jail.

1 As far as Charlie and Clem and everyone else who
2 was in jail went, and get the family back together. And
3 everybody was agreeing upon their stories and everything else.

4 Q All right.

5 Who is everyone?

6 A Three girls.

7 Q Tell us.

8 A Squeaky, Gypsy and Sandy.

9 Q And where was Clem at this time?

10 A Brenda.

11 Q And Brenda, that is, four girls, right?

12 A Yeah. Brenda came in later.

13 Q Where was Clem, was he living with the family on
14 Chandler and at Spahn Ranch during this period?

15 A No. Clem came out of jail later on in '70 there.
16 And began living with us at the ranch after we moved out of
17 the Chandler Street.

18 Q Approximately when was it that you moved from
19 Chandler to Spahn Ranch, in 1970?

20 A Well, we moved, but we still had the Chandler
21 Street house and we would use it, like we would stop there and
22 do something.

23 We were staying at both places, really, when Clem
24 got out of jail.

25 Q What is the approximate time period, so we can
26 fix it on the record?

27 A I don't know. Somewhere between January and
28 March.

1 Q Of 1970?

2 A Yes.

3 Q Now, Paul, you told us in response to Mr. Weedman's
4 question as to what you believed when Clem told you about
5 killing Shorty.

6 I believe you said you had a feeling of disbelief
7 and fear and the like. Is that correct?

8 A Yes.

9 Q All right.

10 Did you ever change your belief as to whether or
11 not that statement was true?

12 MR. WEEDMAN: I will object to that, your Honor. I
13 think -- I think whether this young man changed his mind at
14 some later date --

15 THE COURT: I will sustain the objection. Objection
16 sustained.

17 MR. WEEDMAN: Thank you.

18 MR. KATZ: I think counsel is right. I will withdraw
19 the question.

20 THE COURT: Sustained.

21 Q BY MR. KATZ: Now, did you know Frank Retz?

22 A No.

23 Q Did you hear of Frank Retz?

24 A Yes.

25 Q Through whom?

26 A Through Brenda and Clem and Charlie.

27 Q And were there discussions concerning Frank Retz?

28 MR. WEEDMAN: Excuse me, your Honor.

1 MR. KATZ: I am not asking for the statements. I am
2 asking for the fact of whether or not there were discussions.

3 MR. WEEDMAN: All right.

4 I have no objection to that.

5 THE WITNESS: Yes.

6 Q BY MR. KATZ: And just fix the time period in which
7 these discussions were had concerning Frank Retz.

8 A In August of 1969 and in September of 1969.

9 Q And when you had the conversation with Clem on
10 September 7, 1969, without telling us what was said, if anything,
11 was there a discussion about Frank Retz?

12 A Yes.

13 Q That was between whom?

14 A Clem and Brenda.

15 Q That was in your presence, is that correct?

16 A Yes.

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Q Incidentally, you have mentioned a person by the name of Phillips. What is his first name?

A Tom.

Q Is Tom Phillips a friend of Bruce Davis?

A They know each other.

Q And have you seen Bruce Davis in Las Vegas with Tom Phillips?

A Yes.

Q And lastly, Paul, do you have any doubt as you sit here now that Clem, the defendant in this case, made the statement you told us about on September 7th, 1969, concerning the killing of Shorty Shea? Any doubt in your mind?

A No.

MR. KATZ: Thank you. Nothing further.

THE COURT: Is that all, gentlemen?

MR. WEEDMAN: No. I have a few questions, your Honor.

RECROSS-EXAMINATION

INDEX

BY MR. WEEDMAN:

Q When do you remember first telling any police officers about this September 7th, 1969 conversation with Steve Grogan?

A On October 13th or 14th.

Q And did you tell a Los Angeles County police officer?

A Yes.

Q What you have now told us Grogan told you on September 7th?

24-2

1 A Yes.

2 Q When you returned to Spahn Ranch about two weeks
3 later, however, my client was there, wasn't he?

4 A Two weeks later?

5 Q Well, or a week later.

6 A From October?

7 Q No. I'm sorry. Let me back up again. Withdraw
8 that.

9 When following this conversation with a police
10 officer about this September statement of my client did you
11 next see Grogan?

12 A When he got out of jail and was -- I don't know
13 the exact date. It must have been sometime in January.

14 Q It was in December, wasn't it, that you saw him
15 again?

16 A May have been.

17 Q In Van Nuys?

18 A Yes.

19 Q That was in December of 1969, wasn't it?

20 A It seemed like December or January.

21 Q All right. Whichever it was, my client hadn't
22 even been arrested in connection with any Shorty Shea alleged
23 murder at that time, had he?

24 A No, not that I know of.

25 Q As a matter of fact, so we will be clear about it,
26 you are telling us that you had given this statement that my
27 client allegedly made to the police and yet my client wasn't
28 arrested until almost --

24-3 1

MR. KATZ: Excuse me. There is an objection. It is
2 already argumentative in form.

3

THE COURT: You can ask the question.

4

Q BY MR. WEEDMAN: Well, at least you gave the
5 officers, you tell us, this statement sometime in October 1969?

6

A Yes.

7

Q And the following December my client still had not
8 been charged in this connection, isn't that so?

9

A Yes.

10

Q Were you given any kind of immunity for your
11 testimony in this case?

12

A Immunity from what?

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Q Immunity from prosecution.

14

MR. KATZ: Excuse me, your Honor.

15

THE WITNESS: Prosecution for what?

16

THE COURT: Wait a minute.

17

MR. WEEDMAN: For anything.

18

THE COURT: Is there an objection?

19

MR. KATZ: Yes, your Honor. This statement was made in
20 bad faith. There is nothing to indicate that this witness is
21 charged with any crime whatsoever. This is incredible.

22

THE COURT: I will sustain the objection. Ask your next
23 question.

24

MR. WEEDMAN: Forgive me, your Honor. He has talked
25 about stolen cars, he has talked about a machine gun, he is
26 talking about using LSD, he is talking about using marijuana.
27 If those aren't felonies, there are no felonies, your Honor.

28

THE COURT: All right. Read the question. I'll tell

24-4

1 you what the --

2 MR. KATZ: Excuse me, your Honor. I would like to
3 approach the bench.

4 THE COURT: I want the question read.

5 MR. KATZ: No, your Honor.

6 THE COURT: Motion denied. I want the question read,
7 and I'll tell you what I'll do again.

8 (The question was read by the reporter
9 as follows:

10 "Q Were you given any kind of immunity
11 for your testimony in this case?"

12 THE COURT: Well, the People charge a conspiracy. I
13 think it is a question you can ask. The answer is yes or no.
14 Other matters are debatable. I think you are entitled to ask
15 the question.

16 You can answer the question. Overruled. Now,
17 what is your answer?

18 THE WITNESS: No.

19 Q BY MR. WEEDMAN: Didn't at least one police officer
20 or representative of the district attorney's office tell you
21 that you would not be prosecuted in connection with your
22 testimony?

23 MR. KATZ: Excuse me --

24 THE WITNESS: Prosecuted for what?

25 MR. KATZ: Excuse me. Counsel well knows that there is
26 no basis for any prosecution whatsoever based upon his
27 testimony, and he is out of order, and the jury should be
28 admonished to disregard it.

1 THE COURT: I don't know what the answer is. The answer
2 could be yes or no. I don't know.

3 MR. KATZ: Please explain to me in law how he could be
4 prosecuted for anything?

5 THE COURT: Suppose his answer to this question is "Yes."
6 Suppose it is. I don't know. I can't read the man's mind.

7 MR. KATZ: I know what the answer is.

8 THE COURT: Answer the question.

9 MR. WEEDMAN: Oh, now, Mr. Katz is not testifying. If
10 Mr. Katz wants to go under oath, I'll be --

11 THE COURT: There is a question pending. Let's get the
12 answer.

13 Read the question, please.

14 (The question was read by the reporter
15 as follows:

16 "Q Didn't at least one police officer
17 or representative of the district attorney's
18 office tell you that you would not be prosecuted
19 in connection with your testimony?")

20 THE COURT: Answer that yes or no.

21 THE WITNESS: That is a question that -- I have to answer
22 that one yes.

23 MR. WEEDMAN: That is all I have. Thank you, Mr. Watkins.
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1 MR. KATZ: Now, I would like to approach the bench with
2 the court reporter.

3 THE COURT: All right.

4 (The following proceedings were had
5 in chambers outside the presence of
6 the jury.)

7 THE COURT: Now we are in chambers. Go ahead.

8 MR. KATZ: I provided Mr. Weedman with a copy of
9 Mr. Watkins' record. There is no indication whatsoever that he
10 has ever been convicted of any felony whatsoever.

11 Mr. Weedman was apprised specifically by me that
12 Mr. Watkins had never been convicted of a felony, and yet he
13 goes in and starts inquiring into matters which are wholly
14 prohibited and which he has no right whatsoever to bring out
15 in connection with character assassination evidence. He cannot
16 bring in any type of misdemeanor violation.

17 He is suggesting to this jury that because he says
18 he took LSD trips, which could not support a filing of any
19 type of felony because we don't have any of the evidence and
20 in no way could we prosecute him for it, and what he says as
21 to any alleged auto thefts, there is no way we can connect him
22 to any auto thefts, and yet he goes about this knowing as a
23 lawyer that there is no way we could ever file any charges
24 against him.

25 THE COURT: Your objection is to the framing of his last
26 question, is that right? He asked him if he was promised --

27 Read the question. Read the question.

28 (The question was read by the reporter

1 as follows:

2 "Q BY MR. WEEDMAN: Didn't at least one
3 police officer or representative of the district
4 attorney's office tell you that you would not be
5 prosecuted in connection with your testimony?")

6 THE COURT: All right. That is a very vital question
7 because the testimony the man gives could show or couldn't show
8 a favor or bias or prejudice. If the answer is "Yes," -- that is
9 what bugged me or disturbed me on the stand. That is why I
10 didn't snap a judgment. If the answer is "No, nobody ever
11 said anything to me," why, we just move along. If he says,
12 "Yes, promises were made to me," it can be very well argued
13 by the defense counsel that they could or couldn't be biased
14 or prejudiced. I don't know.

15 But it is a matter you can argue to the jury. Now,
16 he says, as I get his answer -- his answer is yes, is it not?
17 Read his answer. He made a statement and then he answered
18 it.

19 MR. KATZ: The answer was in the affirmative.

20 THE COURT: Let's read it. I want the reading of that
21 thing.

22 (The answer was read back by the reporter
23 as follows:

24 "THE WITNESS: That is a question that --
25 I have to answer that one yes.")

26 THE COURT: There you've got it. It doesn't make any
27 difference whether he can or can't be charged with a felony
28 or misdemeanor. It is a question of, what did the district

1 attorney investigator tell him? "We won't file on you?"

2 What does a layman know about whether he can or cannot?

3 I'm not speaking of the truth of the witness'
4 testimony. I'm speaking as to its admissibility. It is for
5 the jury to pass on this. Suppose the investigator says,
6 "Listen, Watkins, we are not going to file on you if you testi-
7 fy here." It doesn't make any difference whether the People
8 can or cannot. It is a question of what did the investigator
9 tell Watkins. That is what the question goes to.

10 So it is a proper question, in my mind. Now, the
11 question is proper. Here's the truth of the question: Did
12 the investigator say such a thing? There you've got it.

13 MR. KATZ: I've submitted it, your Honor. Your Honor has
14 ruled.

15 THE COURT: All right. The ruling may stand. Let's go.

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(The following proceedings were had
in open court outside the presence
of the jury:)

THE COURT: Now, gentlemen, let's go ahead.

Now, we are back in court. The defendant is here.
Counsel are here.

State your name again, Mr. Witness.

THE WITNESS: Paul Watkins.

THE COURT: You have been sworn.

Bring in the jury, Sheriff. Let's go ahead.
We have got three minutes here.

Let's see if we can finish with the witness.

(The following proceedings were had
in open court in the presence of the
jury:)

THE COURT: Now, the jury is back in the jury box. The
alternates are here.

You go ahead.

REDIRECT EXAMINATION

BY MR. KATZ:

Q Paul, just quickly tell us what you were told by
the police and when you were told.

A You mean in connection with immunity?

Q Yes.

A That last question?

Q Yes. In connection with Mr. Weedman's question.

A Oh, I made no immunity agreements because I did

1 nothing to be prosecuted for. But they --

2 MR. WEEDMAN: Excuse me. I will object to that.

3 THE COURT: That calls for a conclusion.

4 MR. WEEDMAN: Not responsive to the question. It is
5 conclusional.

6 THE COURT: Tell us what you said. What you said to
7 the man, what he said to you.

8 MR. WEEDMAN: Excuse me. Your Honor, for the record,
9 may the answer be stricken as a conclusion and not responsive.

10 THE COURT: Yes. That part "We made no immunity
11 agreements" is stricken out. The jury disregard it.

12 Tell us what was said. What you said to the
13 officers and what he said to you.

14 THE WITNESS: They said, "Go ahead. Tell us. Go ahead.
15 You can talk. It's all right. You can talk. Anything that
16 you may say won't press charges. Go ahead. Talk."

17 Q BY MR. KATZ: All right.

18 And did you talk?

19 A Sure.

20 Q All right.

21 And incidentally, did that statement by the police
22 in any manner, shape or form cause you to color, embellish or
23 taint the truth as you told it to the officers?

24 A I got nothing to hide.

25 THE COURT: Do you understand the question?

26 The question is did the statement cause you to
27 not tell the truth?

28 Restate your question. I don't think he understands

1 it. Get the answer.

2 Q BY MR. KATZ: Did that statement of the police
3 officers "Don't worry. Go ahead and talk. We won't press
4 any charges" -- did that in any way cause you not to tell the
5 truth?

6 MR. WEEDMAN: Your Honor, the witness is not -- it is not
7 for the witness to tell us that he is telling the truth. All
8 witnesses are presumed to tell the truth.

9 It is a matter for the jury to decide.

10 THE COURT: Well, make your objection. Don't argue.

11 MR. WEEDMAN: I object to that on the basis, your Honor,
12 it is just a self-serving declaration on the part of this
13 witness.

14 THE COURT: Overruled.

15 You may answer.

16 Q BY MR. KATZ: Paul, do you understand the question?

17 A That didn't stop me from telling the truth.

18 Q All right.

19 Did anything cause -- strike that.

20 In any manner, shape or form did you lie to the
21 police or to the prosecution or to anybody?

22 MR. WEEDMAN: I will object to that, your Honor.

23 THE COURT: I will sustain the objection.

24 MR. KATZ: No further questions.

25 THE COURT: I think it is covered. Sustained.

26 MR. KATZ: Thank you.

27 THE COURT: Is that all, gentlemen?

28 Otherwise we will go to tomorrow.

1 MR. WEEDMAN: Yes, your Honor. I would again
2 respectfully request that Mr. Watkins remain on call as a
3 defense witness.

4 THE COURT: Let me get this straight, though. You are
5 through now?

6 MR. WEEDMAN: With the examination.

7 THE COURT: With Watkins unless he is recalled?

8 MR. WEEDMAN: That is correct.

9 THE COURT: That is a correct statement?

10 MR. WEEDMAN: Yes, it is, your Honor.

11 THE COURT: All right.

12 Now, you are excused from testimony at this time,
13 but it is possible, Mr. Watkins, you can be recalled back. So
14 what is called remain on call in case we get in touch with you.

15 THE WITNESS: Okay.

16 THE COURT: All right.

17 We will recess till 9:30 tomorrow, ladies and
18 gentlemen.

19 Do not discuss the case or come to any conclusion
20 or opinion. Thank you.

21 (At 4 p.m. an adjournment was taken
22 to Friday, August 13, 1971, at 9:30 a.m.)
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