

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 47

HON. ADOLPH ALEXANDER, JUDGE

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

-vs-

CHARLES WATSON,

Defendant.

6024

No. A-253,156

REPORTER'S DAILY TRANSCRIPT

Wednesday, September 15, 1971

VOLUME 24

Pages 3837 - 4027

APPEARANCES:

See Volume 1.

COPY

HAROLD E. COOK, CSR  
CLAIR VAN VLECK, CSR  
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4 I N D E X

5 DEFENDANT'S WITNESSES:

6 DIRECT CROSS REDIRECT RECROSS

7 CROCKETT, PAUL

8 3837-MK

9 (Recalled)

10 3928-B 3931-MK

11 FLYNN, JUAN

12 3857-MK

13 3910-K 3921-MK  
14 3924-MK

15 3922-K

16 BOHR, VERNON

17 3934-SB

18 3957-B 4015-SB  
19 4025-SB  
20 4026-SB

21 4020-B  
22 4025-B

23 E X H I B I T S

24 (NONE)  
25  
26  
27  
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#1

1 LOS ANGELES, CALIFORNIA, WEDNESDAY, SEPTEMBER 15, 1971; 9:35 A.M.

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3  
4 THE COURT: Good morning.

5 THE JURORS: Good morning.

6 MR. BUGLIOSI: Good morning, your Honor.

7 MR. BUBRICK: Good morning, Judge.

8 THE COURT: People against Watson.

9 Let the record show all the jurors are present,  
10 thankfully; all counsel are present, defendant is present.

11 Mr. Bubrick, you may proceed.

12 MR. BUBRICK: Mr. Keith is going to carry on.

13 THE COURT: Mr. Keith, you may proceed.

14 When I say Bubrick I mean Bubrick or Keith.

15 MR. KEITH: Call Paul Crockett.

16 THE CLERK: Step forward and raise your right hand,  
17 please.

18 You do solemnly swear that the testimony you are  
19 about to give in the cause now pending before this court shall  
20 be the truth, the whole truth and nothing but the truth, so  
21 help you God?

22 THE WITNESS: I do.

23  
24 PAUL CROCKETT,  
25 called as a witness on behalf of the defendant, testified as  
26 follows:

27 THE CLERK: Thank you; take the stand and be seated, and  
28 would you state and spell your name, please.

1 THE WITNESS: My name is Paul Crockett.

2 THE CLERK: Spell it, please.

3 THE WITNESS: P-a-u-l; C-r-o-c-k-e-t-t.

4  
5 DIRECT EXAMINATION

6 BY MR. KEITH:

7 Q Mr. Crockett, what is your age?

8 A I am 47.

9 Q Where do you live now?

10 A I live at Shoshone, California.

11 Q Where is that, sir?

12 A That's just on the edge of Death Valley.

13 Q Is that in Inyo County?

14 A Inyo County, yes.

15 Q Have you lived in Shoshone for some period of time?

16 A Since October 2, 1969.

17 Q And what is your present occupation, Mr.

18 Crockett?

19 A I am the manager of the Charles Brown Division --  
20 the propane division of the Charles Brown Company.

21 Q And at one time could you have described yourself  
22 as a miner or a mining engineer?

23 A No, I wasn't a mining engineer; I was prospector,  
24 more or less to speak.

25 Q All right, I was being euphemistic.

26 And did your prospecting include the area of  
27 Death Valley?

28 A It did.



1 Q And the Owens Valley, perhaps?

2 A Not Owens Valley, no.

3 Q Just the Death Valley; and at some time before  
4 October 2, 1969 did you have occasion to meet two young men  
5 named Paul Watkins and Brooks Posten?

6 A I did.

7 Q And when did you first come to know those two  
8 young men?

9 A I met Brooks Posten in the first week of March  
10 in 1969.

11 Q That was before you had met Paul Watkins?

12 A Yes.

13 Q Approximately when did you meet Watkins for the  
14 first time?

15 A It would be the latter part of May in the same year.

16 Q And where did you meet Brooks; was this in some  
17 place in Death Valley?

18 A It was at the Barker Ranch.

19 Q And where is the Barker Ranch in relation to  
20 Shoshone, say?

21 A It is about 67 miles.

22 Q And were you living at the Barker Ranch at that  
23 time?

24 A Yes.

25 Q How long had you lived at the Barker Ranch before,  
26 let's say, March 1969?

27 A That was the beginning.

28 Q And was Brooks Posten already living or appear to

1 be living at the Barker Ranch when --

2 A He was there.

3 Q And were other young people there at the Barker  
4 Ranch in March of '69 besides Brooks Posten?

5 A One girl and he were there when I arrived.

6 Q After you met Paul -- after you met Brooks Posten  
7 did you have conversations with Posten about a gentleman by  
8 the name of Charles Manson?

9 A I did.

10 Q Without going into the substance of the conversa-  
11 tions, did you have numerous conversations with him?

12 A About six months of it.

13 Q And did you do or say anything to attempt to  
14 dissuade Posten from continuing to be a so-called Manson family  
15 member?

16 A Well, I spent quite a bit of time with the boy  
17 because it was quite evident to me that he was in a bad place.  
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#2  
1 Q All right.

2 And then in May of 1969 did you also meet Paul  
3 Watkins at the Barker Ranch?

4 A I did.

5 Q And did you have conversation with Watkins about  
6 Manson?

7 A I did.

8 Q And were these along the same lines that you had  
9 with Mr. Posten?

10 A Yes.

11 Q And I take it then that you were attempting to  
12 dissuade Watkins from the life that he had been leading with  
13 Manson and his family.

14 A Well, I did.

15 Q You did manage to do so?

16 A Yes.

17 Q And from time to time did you go out prospecting  
18 with Posten and Watkins?

19 A Well, that is what I called it.

20 Q You mean there was some other purpose?

21 A There was a motive behind it, to change the things  
22 that were in their head, to give them an opportunity to get  
23 away from it.

24 Q Did Posten and Watkins talk to you generally about  
25 Manson's way of life and his philosophies and helter skelter  
26 and the bottomless pit?

27 A I had six months of it. I had a pretty good brief  
28 on it.

1 Q Mainly from those two boys?

2 A Right.

3 Q And did you continue to live at the Barker Ranch  
4 from, say, March 1969 to October 1969 when you moved to  
5 Shoshone?

6 A There was one period of 8 days that I was gone  
7 from there.

8 Q And when you left for this 8-day period were you  
9 with any other so-called family members?

10 A They went with me.

11 Q When you say "they" --

12 A Brooks Posten and Paul Watkins.

13 Q Now you are referring to this episode where you  
14 ostensibly took them prospecting but your motive was to try  
15 and rid them of Manson's ideas?

16 A That was my idea, yes.

17 Q From time to time during the period from March to  
18 October 1969 did any other members of the so-called Manson  
19 family come to the Barker Ranch?

20 A There was two or three of the people came up  
21 there that knew Paul Watkins and Brooks.

22 Q Did you ever meet Manson himself?

23 A Yes.

24 Q And when did you meet him for the first time,  
25 approximately?

26 A The first week of September 1969.

27 Q Did you ever have any conversations with Mr.  
28 Manson?

1 A Quite a few.

2 Q Private conversations or in a group?

3 A Both.

4 Q And what did Manson tell you about in substance  
5 or effect?

6 A Oh, he only related to me what I had already  
7 heard.

8 Q You mean Manson talked to you about his experiences?

9 A The whole thing, the whole shot.

10 Q All right.

11 A I mean not the violent aspect of it, but his whole  
12 program of what he was doing with the family, his family, and  
13 their sweetness. At the time I met him he was playing a nice  
14 sweet innocent man.

15 Q Did you debate with him over the rightness of  
16 what he was telling you?

17 A You didn't debate with Charlie.

18 Q You just sat and listened most of the time?

19 A No. We would exchange ideas but never use it as  
20 a point of contention.

21 Q In other words, you didn't actively argue with  
22 Manson?

23 A No.

24 Q Did you ever meet Charles Watson, the defendant in  
25 this case?

26 A Yes.

27 Q When did you first meet him approximately?

28 A It was in the first week when Charlie came up, the

1 first week of September 1969.

2 Q Did Watson come with Charlie Manson?

3 A Yes.

4 Q Together?

5 A As best I recall he and Charlie came together in  
6 the dune buggy rail job that they had.

7 Q And this was at the Barker Ranch?

8 A Yes.

9 Q Did you ever spend much time with Mr. Watson?

10 A Not too much.

11 Q How long did you know Mr. Watson? Would this be  
12 from the early part of September to the early part of October  
13 when you left?

14 A Well, the only time that I really ever, say, had  
15 anything to do with Mr. Watson at all was I helped him change  
16 the engine on a dune buggy one night.

17 Q And did you ever have any extended conversations  
18 with Mr. Watson such as you had with Mr. Manson?

19 A No.

20 Q How would you describe Mr. Watson?

21 A Well, to me Tex was a nice guy.

22 Q Would you describe him as -- I don't want to put  
23 words in your mouth, I am not allowed to do that --

24 A Well, it just seemed that he was in the wrong  
25 place. He just didn't seem like that kind of a guy.

26 Q Did he talk a lot?

27 A No.

28 Q Was he very quiet?

1 A Always.

2 Q Did he ever express any ideas to you?

3 A No.

4 Q Did you ever see him in other places at the  
5 Barker Ranch, or doing other things besides working on this  
6 dune buggy?

7 A I rode with him a couple of times up and down  
8 the canyon, but no conversations.

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1 Q Did you ride in the dune buggy, or one of your  
2 own vehicles?

3 A No, I rode in a dune buggy with he and Charlie.

4 Q Manson?

5 A Yes.

6 Q What were you doing riding up and down the canyon,  
7 just riding, or did you have some purpose in mind?

8 A Well, they asked me to go.

9 Q Was there any -- how many trips did you make with  
10 Manson and Watson up and down the canyon in a dune buggy?

11 A In this particular one?

12 Q Oh, any dune buggy.

13 Q About, oh, I would say, a half dozen times I went  
14 up and down the canyon with them.

15 Q When you speak of canyon, perhaps you could tell  
16 us what canyon.

17 A This was Goler Canyon.

18 Q And is Goler Canyon somewhere near Barker Ranch?

19 A Well, it is the mouth of Goler Canyon comes out  
20 in Panamint Valley, which is on the Ballarat side of  
21 Death Valley.

22 Q This is all Death Valley we are talking about?

23 A Well, actually the Barker Ranch is not in Death  
24 Valley, it is about two miles outside of it.

25 Q And Barker Ranch is at the mouth, you say, of  
26 Goler Canyon?

27 A No, it is up in, say, in the higher part of the  
28 watershed of the Goler Canyon.



3-2

1 Q Is it very dry and arid by Barker Ranch?

2 A Yes.

3 Q All right. So when you speak of that canyon, you  
4 are talking about Goler Canyon; is that correct?

5 A That's the one.

6 Q And on six or so occasions you'd drive up and down  
7 Goler Canyon with Watson and Manson?

8 A And other people, too.

9 Q Other members of Manson's group?

10 A Yes.

11 Q And would there be much in the way of conversation  
12 during these rides?

13 A You mean individual conversations? No, it was  
14 just -- they were all talking about helter-skelter and differ-  
15 ent things that were going on.

16 Q Who would do the talking about helter-skelter, all  
17 of them, or Manson, primarily?

18 A Well, it's like I said, I never heard Tex voice  
19 much opinion about anything; but Manson spoke continuously  
20 of it and the other members did, too.

21 Q And could you tell us the names of some of the  
22 other members, as you put it, who went on these dune buggy  
23 rides with you?

24 A Well, there was Tex, Charlie, which we already  
25 have.

26 Q That is Charlie Manson, isn't it?

27 A Right; Charlie Manson.

28 Q And by "Tex," you mean Tex Watson?

3-3  
1 A And there would be some of the girls; there was  
2 Brenda.

3 Q Brenda McCann?

4 A Brenda McCann; and the one that I knew as Ruth.

5 Q Ruth Moorehouse, maybe?

6 A (Nods head.)

7 Q You have to answer out loud.

8 A Well, I was just trying to recall the names to go  
9 with them.

10 Q All right.

11 A Then there was Brooks and Paul, usually were  
12 around together, too; then there was Gypsy.

13 Q That's Kathryn Share?

14 A Yes, and then there was Bruce Davis and Clem.

15 Q Clem Tufts?

16 A Right; and there were a lot -- but those were the  
17 ones that were in the general area that were around me. I  
18 mean, there were a lot of the other girls there, but --

19 Q These were the people that generally would go on  
20 these dune buggy trips up and down the canyon?

21 A Yes.

22 Q And what did Manson say about helter-skelter and  
23 other things during these rides, generally?

24 A That it was coming down fast.

25 Q Anything else that you can remember?

26 MR. BUGLIOSI: It appears to be hearsay, your Honor.

27 THE COURT: Sustained.

28 MR. KEITH: Very well; we can't go into the conversations

3-4  
1 any further.

2 Q Did you ever see any of Manson's people at the  
3 Barker Ranch do anything at Manson's request or direction?

4 A Request or direction? Well, he never did what I  
5 would say give direct orders.

6 Q Did people seem, appear, though, to do things that  
7 he asked them to do?

8 A Oh, quite frequently.

9 Q And would there appear to be some sort of almost  
10 like a brainwave between Manson and his followers?

11 MR. BUGLIOSI: Calls for a conclusion, your Honor.

12 THE COURT: Sustained.

13 Q BY MR. KEITH: Could you describe for us, Mr.  
14 Crockett, how Manson would ask, or get people to do things  
15 for him?

16 A Well, he used what he called motion.

17 Q All right, tell us about that.

18 A And he used to promise Brooks and Paul when they  
19 got to be super-duper like him, he would pass the motion on  
20 to them, and this seemed to be one of his mainstays that he  
21 spoke about quite frequently, was motion.

22 Q Well, did you ever see him employ this device to  
23 his benefit?

24 A Well, I know that people used to get up and do  
25 things for him and bring him something to eat or a cigarette  
26 or whatever it was they smoked, and did this little things  
27 for him that he used to seem well pleased that he got them  
28 to move when he wanted them to.

3-5  
1 Q Did he have to say anything to get people to get  
2 him things?

3 A No.

4 Q How would he do it?

5 A With motions of his hand.

6 Q Could you describe what sort of motions he would  
7 make?

8 A Well, he used to sit and move his hands very deftly  
9 through the air.

10 Q You mean sort of a waving motion through the air?

11 A And he'd describe it to me by taking a book and  
12 putting it in his hand and then he would move the book in  
13 different directions and different ways and set patterns until  
14 soon he could run his hand through the air just like this,  
15 but it would all have a very set pattern.

16 Q And would he do this in the presence of the other  
17 family members there at the Barker Ranch?

18 A Oh, yes.

19 Q And when he would make this wavy motion with his  
20 hand, would the family members respond in some manner?

21 A Yes.

22 Q And what would they do; is that when they would  
23 go get him cigarettes or --

24 A Well, he had different motions that he said that  
25 would create different thought patterns, so that they knew  
26 what to do.

27 Q So Mr. Manson didn't use just the one motion to  
28 obtain a response, but he used various kinds of hand motions?

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A Well, I wasn't aware of just exactly all the ones;  
he just showed me that one.

#4

1 Q But in any event when he would make some kind of  
2 motion with his hand, would one of the girls or men at the  
3 ranch do something for him?

4 A Well, it was kind of a quiet situation. Anyone  
5 else around wouldn't notice it unless he explained to you.

6 Q Charles Manson had explained it to you; is that  
7 correct?

8 A No. He wasn't about to explain it all to me.  
9 That was his secret, but the only part that I am telling you  
10 is the part where he showed me how he would set it up with  
11 the book in different places and different things were done.

12 Q And did you see this with your own eyes?

13 A Not that I would see exactly how he did it, no.

14 Q But would you see the other young people at the  
15 Barker Ranch do things in response to Manson's hand motions?

16 A It was more that Brooks and Paul told me how his  
17 motions worked than what Charlie did or what I saw.

18 Q Did you see on any occasion any of the people  
19 there get him things?

20 A Oh, yes.

21 Q And would these other people just bring Manson  
22 things without any words on Manson's part?

23 A Oh, he even told me that he didn't have to talk  
24 to them. All he had to do was want something and they would  
25 get it for him.

26 Q Did the family members at the Barker Ranch live  
27 inside some building or did they live outside?

28 A Outside while I was there.

1 Q Did they have tents or sleeping bags?

2 A They just had sleeping bags and they would sleep  
3 on the rocks or wherever they stopped.

4 Q Did you sleep in the house or ranch house assuming  
5 there was one?

6 A Well, I stayed in this one particular room, yes.

7 Q And where did Manson stay?

8 A He came in and out. I don't know where he stayed.  
9 After I left I understood he took over the whole thing.

10 Q Were you using the Barker Ranch as sort of a  
11 headquarters for your prospecting?

12 A I was using it, yes.

13 Q Was Mr. Watson still there when you left for  
14 Shoshone on or about October 2, 1969?

15 A Yes.

16 Q Did you ever observe any group activities going  
17 on between Manson and his family?

18 A Yes.

19 Q Like group singing?

20 A Yes.

21 Q Or group smoking marijuana or what have you?

22 A Well, I wasn't too hep as they say on drugs  
23 because I didn't know anything about it until I got there and  
24 I began to find out about it.

25 Q Did Manson talk to you at all about drugs --  
26 without going into what he said, the subject matter?

27 A Yes. He had private conversations where he told  
28 me things that he did and I told him things that I did and so

1 he told me that I couldn't have known the things that I knew  
2 without having taken drugs but I did.

3 Q What group activities did you observe?

4 A Mostly music.

5 Q Would there be any leader when the music was  
6 played?

7 A Charlie played the guitar. You would say if  
8 he was singing a song and all the others were singing with  
9 him, that would be a group activity where you could observe  
10 him being the leader, but he didn't claim to be the leader.

11 Q Did you observe any group discussions at the  
12 Barker Ranch between Manson and his family?

13 A That wasn't tolerated.

14 Q Pardon me?

15 A That wasn't tolerated.

16 Q What wasn't tolerated?

17 A Group discussions. Charlie did the discussing.

18 Q Were there any times when you saw Manson doing  
19 the discussing with other members of his family?

20 A He would do a lot of strange things in my way  
21 of thinking, like one night when we were in the kitchen of  
22 the main ranch house and he got up and said that he had this  
23 dream last night where he was the greatest swordsman in the  
24 world and he got out and he demonstrated the different things  
25 that he dreamed about in this dream and he would put pictures  
26 in front of them that way, what he wanted them to know and  
27 hear.

28 Q Did you see him do any other unusual things? By



1 "him" I am referring to Manson.

2 A Unusual?

3 Q Well, you told us that you observed him doing  
4 some rather strange things and you have described one incident  
5 where he had a dream about being a swordsman.

6 A Well, he was the most persistent man that I have  
7 ever met in my life.

8 Q What do you mean by that?

9 A In other words, when he decided to do something  
10 he just drove and drove and drove and drove and drove until --  
11 he wanted me off the ranch so he could have it, so he used  
12 to put all kind of fear tactics on me, threaten to kill me  
13 and other things.

14 Q But he didn't scare you?

15 A No. I thought it was funny but at that time I  
16 wasn't aware of what had already gone ahead too.

17 Q Did his family, in other words, the people at the  
18 ranch, seem subservient to him? Do you know what I mean by  
19 subservient?

20 A No, they didn't seem subservient. They were.

21 Q Was Mr. Watson also subservient to him?

22 A I would say yes.

23 Q Did you ever hear Mr. Watson say anything at all  
24 other than in respect to repairing the dune buggy or any other  
25 vehicles that may have been there?

26 A The conversations that Mr. Watson had were so nil  
27 when I was around that practically the only conversations I  
28 had with him when we were changing the engine was, "This

1 wrench" or "that wrench" or "the spark plug," or whatever  
2 was needed to finish that job.

3 Q Did Mr. Watson ever appear to you to be full of  
4 personality and expression and effervescence, that kind of  
5 a person?

6 A No.

7 MR. KEITH: I have no further questions.

8 MR. BUGLIOSI: I have no questions, your Honor. Could  
9 the court order the witness, however, to remain in Los  
10 Angeles at least through the noontime.

11 THE COURT: Can you do that for us?

12 THE WITNESS: Certainly.

13 THE COURT: Very good. You are so ordered. Thank you.  
14 You may be excused.

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MR. KEITH: Call Juan Flynn.

THE CLERK: Raise your right hand, please.

You do solemnly swear that the testimony you may give in the cause now pending before this court shall be the truth, the whole truth, and nothing but the truth, so help you God?

THE WITNESS: So help me God.

JUAN FLYNN,

called as witness by the defendant, testified as follows:

THE CLERK: Thank you. Take the stand and be seated, and will you state and spell your name, please?

THE WITNESS: My name is Juan Leo Flynn; they call me Juan.

THE CLERK: Would you spell your name?

THE WITNESS: F-l-y-n-n; F-l-y-n-n.

THE CLERK: And the middle name is Leo?

THE WITNESS: L-e-o.

THE CLERK: Thank you.

DIRECT EXAMINATION

BY MR. KEITH:

Q Mr. Flynn, how old are you now?

A 27, 28 years old, something like that.

Q You are not exactly sure; is that correct?

A Well, I am sure, you know; I was born in November 9, 1943.

Q Did you ever know a man by the name of Charles

5-2

1 Manson?

2 A Yes.

3 Q Where did you first know him; where was it?

4 A When I first met the man was at Spahn's Ranch.

5 Q Were you living at the Spahn's Ranch at that time?

6 A Yes.

7 Q And approximately when was this, Juan?

8 A Somewheres in '68, in the beginning of '68, around  
9 there somewhere.10 Q And what were you doing at the Spahn Ranch at the  
11 time you first met Manson?

12 A I was working at the ranch.

13 Q It was a ranch that raised horses at that time?

14 A They rented horses.

15 Q And you were working with the horses?

16 A Yes.

17 Q Would you describe yourself as a cowboy at that  
18 time?

19 A As cowboy, as wrangler, as ranch hand.

20 Q And do you know Charles Watson, the defendant in  
21 this case?

22 A Yes.

23 Q Did you meet him also at the Spahn Ranch?

24 A Yes.

25 Q Was that sometime later, after you -- or, sometime  
26 after you first met Manson?

27 A It was after I met Manson.

28 Q When you first met Manson did he come there alone

1 or was there a group of people with him?

2 A There was a group of people with him.

3 Q How many, would you say?

4 A Well --

5 Q Approximately.

6 A Seven, somewhere in there; seven, eight, somewhere  
7 in there, it wasn't too many.

8 Q Were they predominately young girls?

9 A There was some girls and three boys.

10 Q Did they start to live at the Spahn Ranch?

11 A Well, yes, at the back house, the back part of  
12 Spahn's Ranch.

13 Q After Manson and these seven or eight young people  
14 moved in, did you see a lot of Mr. Manson?

15 A Yes, at the lower part of the ranch. They had a  
16 black bus back there when they lived there, when they first  
17 arrived there.

18 Q Did you have occasion to talk to Manson and the  
19 girls when they were living in the black bus at the lower end  
20 of the ranch?

21 A Yes.

22 Q And did they all tell you something about them-  
23 selves and their relationship between each other?

24 A I don't remember if they did that. I know they  
25 lived in a bus and I liked one of the girls there.

26 Q How long did you stay at the Spahn Ranch, let's  
27 say, after Manson arrived?

28 A After he arrived?

1 Q Yes, how long did you stay there?

2 A Over a period of years, but I -- a couple of  
3 times I left.

4 Q I see. When was it, approximately, that you left  
5 the Spahn Ranch permanently, never to return?

6 A Well, I left a little bit more than a year.

7 Q Would this be in 1969?

8 A This is '71 -- 1970, somewhere in there.

9 Q Were you at the Spahn Ranch when a number of  
10 sheriff's deputies raided the place?

11 A Yes.

12 Q And was that on August 16, 1969?

13 A Yes, that was the raid.

14 Q And did you leave the Spahn Ranch and go somewhere  
15 sometime after the raid?

16 A Yes.

17 Q Did you go up to the desert?

18 A Yes.

19 Q And was this at Barker Ranch or Myers Ranch?

20 A Well, I went to Barker and Myers, you know, but  
21 mostly Barker.

22 Q And this was after the August 16th raid; is that  
23 a correct statement?

24 A After the August 16 raid, that's right.

25 Q And did you stay at the Barker Ranch for a period  
26 of time after you got there?

27 A Yes.

28 Q When did you leave the Barker Ranch for the last

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time? I realize dates are difficult.

A A month, a month and a half, two months, you know; it's in that period of time.

Q Now, you told us you were at the Spahn Ranch from the early part of 1968 to sometime shortly after the raid in 1969; is that right?

A Yes.

Q With the exception of one period of time when you were away?

A I didn't say one period of time; I said periods of time, in which I left Spahn Ranch. I went to the hospital one time and one time I went with these people to Utah.

Q To Utah, did you say?

A Utah, yes.

Q All right. I just -- I'm not disputing it, I didn't quite understand.

A And I went to the desert, and that was it, you know.

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1 Q But during this period of time from the early part  
2 of '68 till after the raid of '69, would you say your home  
3 base was Spahn Ranch?

4 A Well, yes.

5 Q Did you while you were at the Spahn Ranch observe  
6 among the people there the use of drugs?

7 A Yes. I saw --

8 Q Let me approach it this way: After Manson  
9 arrived there with the seven or eight other young people, did  
10 other people later on while you were there join Manson and  
11 his family group?

12 A Yes.

13 Q And did people come to the Spahn Ranch and stay and  
14 leave, or was there sort of a constant flow of humanity in and  
15 out of the place?

16 A Well, there was, you know, there was, what I can  
17 see that there was just normal for people to come and go. Now,  
18 other people that came through the family or came with the  
19 family would come and go somewhere else and do something and  
20 then come back, you see, but they would still be in contact, you  
21 see.

22 Q I understand.

23 You used the phrase "family." Is that how it was  
24 used at the Spahn Ranch when you were there with Manson, or is  
25 this a term that has been applied to Manson and his group more  
26 recently?

27 A Well, I don't want to answer that.

28 Q Well, if you can't answer it -- you referred to a



6-2

1 family.

2 A Yes.

3 Q Is this how it appeared to you, to be kind of a  
4 family?

5 A Well, yes, to me.

6 Q Let's say at the time of the --

7 A And other family members would say, you know,  
8 "The family" to me, you know. I saw them as the family and  
9 other members of the family would refer to it as "the family."

10 Q That is what I was getting at before. Apparently  
11 my question wasn't clear. I'm sorry.

12 A I just have to look at it.

13 Q At the time of the August 16, 1969 raid, how many  
14 members of the family would you say there were approximately?  
15 Bearing in mind he started out with about seven. By "he" I  
16 refer to Manson.

17 A There was a whole bunch of them.

18 Q And were they mostly young girls?

19 A Well, there was girls there and there was boys  
20 that were coming from all over the place out of the buildings  
21 and then sitting in front of the --

22 Q I didn't mean for you to describe what happened at  
23 the raid. I just wanted to find out approximately how many  
24 family members there were at that time.

25 A Could have been between 25 -- could have been 20,  
26 25, somewhere in there, maybe less, you see.

27 Q And what was the percentage at that time between  
28 boys and girls? I am talking about the family members now,

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1 not just people who hung around from time to time.

2 A About six or seven boys. Can I name them?

3 Q Sure you can name them.

4 A Okay. There was Grogan.

5 Q That is Clem Tuffts?

6 A Clem Tuffts and there was Charlie Manson and there  
7 was Bruce Davis and there was Danny DeCarlo and there was  
8 little Larry and T.J.

9 Q That is T.J. Wallerman?

10 A I don't know his last name. There was -- well,  
11 there was just boys, you know, about six.

12 Q Watson wasn't there at that time?

13 A Yes, he was.

14 Q He wasn't there at the time of the raid, was he?

15 A I don't think so. I didn't see him in jail.

16 Q Incidentally, were you ever a member of the family?

17 A Well, I was there, you see.

18 Q Did you consider yourself a family member?

19 A Well, that is hard to answer, you see, because I  
20 was there and the activities that took place during the days,  
21 you see, is what put the family together because with those  
22 activities, the family would make something to go out like  
23 they say to go to the desert or to do what they were doing  
24 with the dune buggies and like that, you know. So I was there.

25 Q Did you participate in any of these activities?

26 A Well, I stuck around mostly with the horses, you  
27 know. I didn't do anything with dune buggies or anything like  
28 that, you know.

1 Q Were you employed, by any chance, by George Spahn?

2 A Yes.

3 Q Getting back to the subject of drugs, did Mr.  
4 Manson introduce drugs into the ranch?

5 MR. BUGLIOSI: Calls for a conclusion.

6 THE COURT: Sustained.

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MR. KEITH: I will withdraw the question.

Q Did you see drugs used at the ranch?

A Yes.

Q What kind of drugs, if you know?

A Well, there was acid --

Q That's LSD?

A LSD; there was some talk about Bennies, which are for speed, you know; and there was some talk about belladonna, you see, around the ranch, around the members of the family. There was a discussion that they had of drugs and stuff like that, and I had a man once come up to me with a bag of acid, too, so there was drugs in the ranch.

Q Did you ever see Manson dole out any drugs to any of the family members?

A That's the time; that's the man that I'm talking about with the bag of acid that come that wanted to give me some acid, you know, with a plastic bag like that. He come in the kitchen one time. He says, "You want some?"

Q That's Manson you are talking about?

A Manson, yes.

Q Did you ever see him give drugs or offer drugs to any of the other family members?

A Well, I don't remember seeing him give drugs to anyone, you see; but I do remember seeing people that normally they wouldn't be that way, you know, and I can say this because I, myself, have taken it, you see.

Q I was going to ask you that, but you preceded me. You have taken acid a few times, have you?

7-2

1 A Yes.

2 Q And was this at the Spahn Ranch?

3 A Well, a couple of times at Spahn's Ranch.

4 Q And were you able to observe certain changes in  
5 people that led you to form the opinion they had taken acid  
6 or some other kind of drug?

7 A Yes.

8 MR. KAY: Well, that calls for a conclusion on his part,  
9 your Honor. He can describe his own reaction.

10 THE COURT: Well, all he says, that he observed changes;  
11 he didn't describe them of any kind.

12 Q BY MR. KEITH: What changes would you observe in  
13 people that led you to this opinion that they had taken a drug?

14 A Well, one of the girls one time walked up to me  
15 and, you know, I could tell, you see, and then --

16 THE COURT: You can tell, but we can't unless you tell  
17 us.

18 THE WITNESS: Oh.

19 THE COURT: You see?

20 THE WITNESS: Oh, then I want to tell you.

21 THE COURT: Yes.

22 THE WITNESS: Anyhow, one of the girls come up to me  
23 one time, you know, and she says, "Juan, Juan," and she had  
24 big eyes and she had this and that, and Charles Manson saying,  
25 -- sometimes he encouraged this on me, because he felt that  
26 that would make me through the changes, you see, that that  
27 would take me through the changes that he saw were best fit  
28 for me, you see, and then to have me do those things in the

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1 changes that he wanted me to go through; then he wanted me to  
2 take acid, you see.

3 Q BY MR. KEITH: Did he talk to you about taking  
4 drugs?

5 A Oh, yeah.

6 Q What did he tell you?

7 MR. BUGLIOSI: Calls for hearsay, your Honor.

8 MR. KEITH: May the Court please, this refers to sort of  
9 a group state of mind there at the Spahn Ranch; I am not offer-  
10 ing it for the truth.

11 MR. BUGLIOSI: Well, Watson wasn't present, your Honor.  
12 It is also irrelevant, calls for hearsay.

13 MR. KEITH: It is not irrelevant.

14 THE COURT: Tell me this, was Watson ever present when  
15 these drugs were doled out like that?

16 THE WITNESS: You want me to answer that, sir?

17 THE COURT: I asked you that.

18 THE WITNESS: Okay. I never saw the man, that I recall  
19 being on dope, you see.

20 I never saw him on it and I never saw him pass it  
21 out, you see. Now, that's as much as I remember, you see.

22 MR. KAY: Could we get a clarification on who you mean  
23 as "the man"?

24 You say you never saw "the man" on dope. Who?

25 THE WITNESS: Watson.

26 MR. KAY: You never saw Watson on dope?

27 THE WITNESS: No, I never saw him on dope; I don't think  
28 I have.

1 Q BY MR. KEITH: Do you recall an experience where  
2 Watson was sort of on a hilltop or a mountain top?

3 A I saw him once walking up this hill -- well, wait  
4 a minute, wait a minute; I saw him once in front of the Spahn's  
5 Ranch and he was -- well, would you ask me the question, first?

6 Q Yes, I will repeat the question.

7 A You know, because I -- if I saw Manson, I mean,  
8 Watson on a hill, I mean, Spahn's Ranch was on a hill and he  
9 lived there, you know, so I saw him on a hill and I saw him  
10 walking around in the back hills, you see; and so I saw him  
11 in the back hills and I saw him across the street, and there  
12 is hills, too, I saw him on those hills, you see.

13 THE COURT: Did you ever see him do anything unusual  
14 while on the hills, or just walking?

15 THE WITNESS: Yeah, yeah; well, unusual, yes.

16 THE COURT: Like what?

17 THE WITNESS: Well, running.

18 Q BY MR. KEITH: What was unusual about that particu-  
19 lar experience that you saw?

20 A Well, there was this big change that came over the  
21 ranch.

22 Q What change came over the ranch?

23 A Well, I couldn't explain it, you know, but I sure  
24 -- I felt something, you see.

25 Now, the man, you know, he changed, he changed.

26 Q Who changed?

27 A Watson.

28 Q How did he change? Could you describe it for us,



7-5  
1 as best you can?

2 A Well, the man was snappier. He would talk cross  
3 to you, you know, instead of going with "And," "But," and  
4 "As" and that. He would talk straight across to you and he  
5 would do things right there, you see (snapping fingers).

6 Q You were talking about Watson now?

7 A Yes.

8 Q Go ahead, tell us about him.

9 A And, you know, he was big eyes, you know.

10 THE COURT: You mean his pupils were dilated; is that  
11 what you mean?

12 THE WITNESS: Well, they were dilated and they were kind  
13 of strange looking, because they were big and they were tense,  
14 you see. They were -- I don't know -- you see, I know I saw  
15 him but I don't know how to describe it to you.



#8

1 Q BY MR. KEITH: Was this on one occasion that you  
2 are telling us about or is this all the time?

3 A Well, this is on one occasion, you see.

4 Q Was Mr. Watson running back and forth?

5 A Yes. Well, that day I saw him running, you see,  
6 one day I saw him running and he was -- that is why I say  
7 he was peppier, you see. All of a sudden he has changed and  
8 the man is running out there and prancing.

9 Q Prancing did you say?

10 A Yes. You know, usually when people ran around  
11 there, they ran, you know, for fun, you know, going like that,  
12 and real fast, you know, but Mr. Watson was running real --  
13 can I show you?

14 Q Yes, please.

15 A Okay. Mr. Watson was running like this, you know,  
16 he was going like that. Then he would stand on the hill and  
17 look down at the ranch.

18 Q And folded his arms?

19 A Yes, you see like that.

20 Q Did he turn around and run in the other direction?

21 A Yes. Well, he was running around, you know, down  
22 from the lower end of the ranch towards the Spahn house and  
23 he was just really, you know, aware. He was really peppy. He  
24 was really bright, you know.

25 THE COURT: Mr. Reporter, I take it you got the  
26 description of his conduct on the record.

27 Let's say he was just jogging, knees high, then  
28 he would stop and fold his arms across the chest and would

8A2

1 observe what was going on, then start running again.

2 THE WITNESS: Yes, very proudly, very proudly.

3 Q BY MR. KEITH: When was this? Do you have any  
4 idea?

5 A It was at Spahn's Ranch.

6 Q I know that but do you know what year it was?  
7 Could you tell us when it was with relation to the raid on  
8 August 16th as the focal point?

9 A Well, it was at Spahn's Ranch. I saw it, you  
10 know, and --

11 Q Did you sort of lose track of time when you were  
12 living at the Spahn Ranch?

13 A Well, I didn't keep time with a calendar, you see.  
14 I keep time with the sun, you know, and keep time with  
15 activity that we had, you see, and, you know, certain days  
16 we clean the barns, certain hours we feed the horses and  
17 certain days we clean the corral, you know, and stuff like  
18 that.

19 Q Did Mr. Watson usually act in a manner that you  
20 described?

21 A No. Usually he was humble, you know, humble. He  
22 was more (demonstrating). He walked --

23 Q Now you are hanging your head and shaking it  
24 back and forth.

25 A Yes -- well, he walked different, you know.

26 Q Show us how he walked.

27 A Well, he would walk like this, you know. He would  
28 walk like this, you know.

1 THE COURT: Very loose jointed and head going back and  
2 forth?

3 THE WITNESS: Relaxed.

4 Q BY MR. KEITH: Would he hang his head and let it  
5 move back and forth as you were doing?

6 A Well, he just acted like Watson, you see.

7 Q Did you know him well?

8 A I knew him when he moved out of Malibu, you see.  
9 That is about the time that I met him, you see.

10 Q Down in Malibu?

11 A No, sir.

12 THE COURT: Out of Malibu.

13 THE WITNESS: Out of Malibu.

14 Q BY MR. KEITH: I am sorry.

15 A There was some people --

16 Q You became well acquainted with him while you were  
17 at the Spahn Ranch?

18 A Well, I knew the man. He was there and I noticed  
19 him, you know, the days that he appeared I noticed him. There  
20 is Tex Watson.

21 You know, the activities that he did around, you  
22 know, working on dune buggies and this and that and come out  
23 of the saloon and there is Tex Watson again. And I would be  
24 down in the barn and there is Tex Watson again and, you know,  
25 I knew him like that, you see.

26 Q Did you ever have any extended conversations with  
27 him about life and philosophical matters?

28 A Philosophical?

1 Q Well, you know, talking about what you were going  
2 to do with your lives, deep conversation, not just passing the  
3 time of day.

4 A You know the whole picture that was up at the  
5 ranch, you know the whole thing was created by Charles Manson.

6 Q We want to get the picture of what was going on  
7 there.

8 A The picture is it was created by him and put in  
9 these people, you see.

10 It was put in these people. You see it was his  
11 ideas of helter skelter and his idea of revolution and it was  
12 his whole confusion, you see, that he put in these people,  
13 you see.

14 And the whole thing just kept turning and turning  
15 and keep going and then the philosophical point of view that  
16 they had on what was going to happen, you see, were discussed  
17 over and over again and that was the life that these people  
18 had to offer each other there because they agreed to each  
19 other and they drove themselves to believe that, you see.

20 Q What do you mean by driving themselves to believe  
21 that?

22 A Well, I mean that if you keep saying that it is  
23 dark right in here and you stay here two or three years telling  
24 yourself that it is dark, it is going to be dark pretty soon.  
25 That is what I mean, you see.

26 Q That is very --

27 A You see, and if you decided to believe that, then  
28 you know that you can accomplish it because you can find every

1 excuse and everything to tell yourself in your mind that it is,  
2 so it is dark and pretty soon, bloop! it gets dark, you know.

3 Q Is this the way Manson operated?

4 A Well, I mean the man used the drug, you see. That  
5 was the first thing, you see. He used the drug, you know, and  
6 if he could get you tired enough of hearing, you see, what  
7 your family had offered you, if he got you tired enough to  
8 get you to listen to him about your family, then you got tired  
9 of your family too and then he started offering you things  
10 like helter skelter, you know, and the -- "The Beatles are  
11 singing about me," you know.

12 And "I am the fifth angel," and I am this and that  
13 and then he would bring in the whole thing to them and then he  
14 would keep them supplied with dope, you see, because that was  
15 one of the things that would take them through their changes,  
16 you see.

17 But dope was necessary because it was beyond his  
18 philosophical points of view, you see, that type of control,  
19 you see.

20 Q Did it appear to you that Manson controlled these  
21 family people?

22 A Well, it appeared to me that the people, you see,  
23 agreed with what Mr. Manson had to offer, you see. That is  
24 what it appeared to be because anything that went against that --  
25 well, then there was nothing there else you see then they come  
26 out with philosophical points of view, you see. If you went  
27 against them, then they have all of this to offer to you.

28 "Well, you know you are me and we are you and you

1 know we are all together and you are my love and I am your love.  
2 So you give me your love," you know, and love and love and  
3 love and love, you know.

4 Q They all talked about this?

5 A Yes. "Eat some more acid," "Go lay down with a  
6 woman," you know.

7 Q Were you ever present on any occasion when a number  
8 of young people were there, a number of young family members and  
9 Manson would preach to them about what you have been telling  
10 us?

11 A Well, I can't tell you -- I can't say the 5th of  
12 November or like that but I can tell --

8A

1 Q I wasn't asking you for a day.

2 A You are talking about the philosophical things?

3 Q Yes.

4 A And all the things that he preached that were  
5 coming down.

6 Q Yes.

7 A Well, I was present, you know. I can't tell you  
8 when.

9 Q I know you can't tell us when because you didn't --

10 A But I was present.

11 Q What did you see and hear on these occasions?

12 A Well, preaching about revelation or revolution  
13 No. 9 and the Karma, you see, the way the Karma is turning. I  
14 don't know what Karma is, you see.

15 He talked about Karma, you see, and he talked about  
16 Karma and why it was going to take place, why the man is going  
17 to come down and cut all the white people's heads and, you  
18 know, shooting in the streets and he would be running out in  
19 the desert with the dune buggy.

20 Then when the black people got tired of the power,  
21 you know, then they would give him the power, you see.

22 He had some idea of -- he had some kind of idea of  
23 power, you see, which was unknown to others, you see, and he  
24 wanted others to question that power in order to give him the  
25 attention, so he could get an agreement on the power that he  
26 was talking about, you see.

27 So he came to me one day, he says -- you know, he  
28 is full of acid, you see -- he says, "I'll give you the power,"



1 you see.

2 "I'll give you the power." And if I would have  
3 said, "What power," you see then I am interested in looking into  
4 it and this runt, you know, he is saying, "I will give you the  
5 power," and if I would have, you know, followed him further,  
6 you know, then I would be following into that -- you know,  
7 let's discuss, let's look at it and maybe, you know, we can  
8 agree with you or I can agree with you, you see, on the things  
9 that you are saying and the things that you are looking at, you  
10 see, but then he would try to feed everybody acid.



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1 THE COURT: To you he was just a runt?

2 THE WITNESS: Well, he was, yeah.

3 Q BY MR. KEITH: Other people didn't think of him  
4 in that manner?

5 MR. BUGLIOSI: Calls for a conclusion.

6 THE COURT: Sustained.

7 Q BY MR. KEITH: Did you ever believe in any of the  
8 things Manson would tell the other members of the family, or  
9 did you ever believe what other members of the family told you  
10 about helter-skelter and --

11 A Well, I didn't believe about helter-skelter, you  
12 see.

13 Q Pardon me?

14 A I didn't believe helter-skelter, you see; and  
15 then -- but I believed, you see, at that time because, you see,  
16 of my upbringing, my father put something there about the black  
17 people so I was saying -- well the black people, you know --  
18 but then he used this, you see. He used this to say, well,  
19 you know, that black people are like this and the black people  
20 are like that, because I lived with them, you know, I lived  
21 so many years or so in jail and I know they are going to take  
22 over and this and that, you see. He talked to me like that  
23 because, you know, I was ignorant enough to believe, you know,  
24 that I was going to -- I could make enough excuses to myself  
25 about the black people, you see, to get from looking at them  
26 as human beings, you know, and he'd use this, you know, against,  
27 you know, to talk to me in order to get me angered to get the  
28 anger into me.

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Q Did Manson apparently attempt to convert you to his way of thinking; is that right?

A Oh, yeah.

Q But you were never converted?

A Well --

Q Or were you?

A I don't know; I stayed pretty -- I kept my distance from him, you see.

Q You were a little worried about him, weren't you, even though you thought he was just a runt?

A No, I wasn't worried, I was just --

Q Mary?

A -- aware of the things and the insanity that was going on through those thoughts, you see, and all the things that he wanted done and all the things that were going to happen. It felt to me like they were insanity.

You see, there were helter-skelter -- well, first of all, I don't know what helter-skelter is and he's trying to teach me helter-skelter, and I look at that and I don't want to be taught helter-skelter because I don't even know what it is; he comes down with the black people getting killed and the white people getting killed and the whole thing, it was just constantly, two years, you know, over this whole period of time that's all you would hear there, helter-skelter, everywhere you went, helter-skelter. They even made a song with that, you know.

Q Is this a Beatle song?

A No, one of Charlie Manson's songs, too, because

9-3

1 Charles Manson felt that the Beatles were talking to him  
2 because he was the helter-skelter -- or, he was the fifth  
3 angel and he'd pick up the bible and say, "There I am," you  
4 know, and he would do that, too; he would do that, too, because  
5 he had to have something to do; and then he had to have the  
6 people believe that something -- that's something he had to do,  
7 you see.

8 Q Incidentally, his family members didn't laugh and  
9 giggle at him, did they, as we have just been doing?

10 A Well, no; I don't think they did.

11 Q They took it pretty serious, didn't they?

12 MR. BUGLIOSI: Calls for a conclusion, it is a leading  
13 question.

14 THE COURT: Well, did you ever observe any of them laugh-  
15 at Charlie Manson when he was present?

16 THE WITNESS: I don't remember sir; I don't remember.

17 THE COURT: In his presence, you didn't laugh at him  
18 either, did you?

19 THE WITNESS: Well, no, I don't remember laughing at him,  
20 you know; I remember that I didn't agree with him.

21 See, let me tell you something --

22 MR. KEITH: Well, let me ask you a question, first.  
23 There is no question pending and we have to go by question and  
24 answer, Mr. Flynn.

25 Q You were going to tell me something? Does it have  
26 something to do with Mr. Manson?

27 A Yes.

28 Q And does it have something to do with his

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1 relationship with you or with Mr. Watson and other members  
2 of the family?

3 A Yes.

4 Q What was it you were going to tell us?

5 A Well, it is that -- well, it would just take a  
6 long time to look at it, you see, but it can be done, you see.

7 Q What can be done, Juan?

8 A Well, Mr. Manson, you see -- Mr. Manson's way of  
9 doing things, you see, and having other people to believe, you  
10 see, those ways can be looked into, you see; but I don't know,  
11 I am just trying to tell you that it was horrible what he did.  
12 It is terrible -- I'm being prejudiced.

13 Q When you say you are being prejudiced, what do  
14 you mean?

15 A Well, just that I'm letting my emotions get --

16 Q Well, are you prejudiced against him; is that what  
17 you are telling us?

18 A Yes.

19 Q By him, I mean Mr. Manson.

20 A Yes, yes.

21 Q And because of your prejudice, you are not -- are  
22 you telling us something other than --

23 A Because I saw what happened, what happened, you  
24 see, and there are two or three more people that saw what  
25 happened, you see; and there is two or three more people that  
26 know, you know, that these people can, you know, this Charles  
27 Manson is the one.

28 Q Well, when you say you are prejudiced, do you mean

9-5  
1 to imply that you are not telling us the truth because --

2 A No, I am.

3 Q -- you are prejudiced?

4 A I am telling you the truth, you know; I am telling  
5 you the truth.

6 Q You just don't like what you saw Mr. Manson do?

7 A Do, you see, because I know he did it.

8 Q What did you see him do?

9 A Why are we here today?

10 Q Well, we are here today --

11 A Well, why are we here today? That's what he did;  
12 this is the man that is responsible.

13 MR. BUGLIOSI: I will move to strike?

14 THE COURT: That will go out.

15 MR. BUGLIOSI: Move to strike and will the Court instruct  
16 the jury to disregard that last statement?

17 THE COURT: Yes, ladies and gentlemen, disregard that  
18 last statement, please.

19 Q BY MR. KEITH: Did you ever hear Mr. Manson talk  
20 with Watson and other members of the family about sin or that  
21 there is no right and there is no wrong and everything is per-  
22 fect?

23 A Yes.

24 Q And did you hear Mr. Manson use expressions of  
25 that nature more than once?

26 A Yes.

27 Q And was this in the presence of other members of  
28 the family?

9-6  
1 A Yes.

2 Q And would this be usually at night after supper,  
3 during singing hours -- or, tell us about it.

4 A Well --

5 Q I don't want to put words in your mouth. You are  
6 just answering "Yes" now.

7 A Well, the halter-skalter and "You are me and I am  
8 you and there is no wrong, and there is no sin and it is all  
9 been put into your head by your parents, in order to control  
10 you."

11 Mr. Manson used to preach these things to family  
12 members. He preached them during the day as soon as he got  
13 up, you know, and he preached that and other family members  
14 discussed that and other family members preached each other  
15 that there was no wrong, no sin, no bad, that it was all in  
16 your head and your parents had put it there to control you and  
17 to lead you the way that they saw most fit to lead you; and it  
18 was just day and night, they talked this.

19 Q Did Mr. Manson ever talk to you and other members  
20 of the family about killing?

21 A Did Mr. Manson ever talk to me or other members of  
22 the family about killing?

23 Q In your presence, yes.

24 A In my presence, yes, he talked to me about killings.  
25 He drove me around the places where he felt that they should be  
26 done because they were pigs and they were -- well, you know.

27 Q Did Manson ever tell you what he meant by the  
28 term "Pigs" or did you just understand what he meant without him

-7  
1 explaining?

2 A Well, pigs, the things that work in the system  
3 get all together and he said they go out and cut all the trees  
4 down, they build cardboard houses, they take and they exploit  
5 nature and they built big buildings; and then they all get  
6 together and they set up a bunch of rules and then those rules  
7 are so strict only they can live, because they make them and  
8 they live in them; and the whole thing is just -- they are  
9 so full caught up in their inhibitions, they are hung up here  
10 and they are hung up there.

11 THE COURT: Those were the pigs?

12 THE WITNESS: Those were the pigs, yeah, you know. The  
13 pig was anyone who agreed with the system; anyone that went  
14 and worked, like they say, if I wanted to get a job somewhere  
15 downtown here, that made me a pig because I was paying my taxes  
16 and it was going to prolong the other things, you see.

17 THE COURT: Mr. Flynn, you look big enough and strong  
18 enough to break him over your knees. Were you physically  
19 afraid of him?

20 THE WITNESS: Not physically; not physically. I was  
21 afraid of him that I do something and then it put me in his  
22 shoes, you see.

23 I was afraid of doing something and then I'd be  
24 just like him; that's what I was afraid of, you see.



#10

1 THE COURT: It wasn't physical fear?

2 THE WITNESS: Well, I was -- I wanted to protect myself,  
3 if that is what you are talking about.

4 I wanted to protect myself, but I wasn't going  
5 after him and doing nothing to him. He came to me.

6 Now, he showed me what he was wanting to do, you  
7 see, because that is all he could talk about, he could just  
8 talk about tying people down on a stake like that and killing  
9 them and this and that, so I knew that was in the man's mind,  
10 you see.

11 So, physically, I wanted to protect myself, you  
12 see, but I didn't want to go to the point of doing something  
13 to him, so that I put myself in his shoes, you see, and then,  
14 you know, just kill him. I didn't want to do that.

15 Q BY MR. KEITH: Are you telling us that you were  
16 afraid that he might gain control of your mind?

17 A No, not control of my mind, you see.

18 I was afraid that one night I would get tired of  
19 him trying to play sneakies on me and I would fill him up with  
20 buckshot. That is what I was afraid of, you see.

21 Q You were afraid you were going to kill him?

22 A Yes.

23 Q You never tried to kill him?

24 A Well, I never went after him, you see, but on  
25 occasions, I had a couple of occasions -- you are talking about  
26 Mr. Manson now?

27 Q Yes.

28 A You know there was occasions where he threatened



10-2

1 physically, you see, he manifested himself physically at the  
2 ranch, at the Barker Ranch, you know, in a very sneaky  
3 suspicious way and those things were the ones that led me to  
4 believe that one of those times I might just have to blow him  
5 off, you see, and then that is what I was afraid of, you see.

6 Not because I felt that he was super aware and  
7 would be able to get in there and do me some harm, but I took  
8 that into consideration too, you see, and so I prepared myself  
9 for anything that would happen.

10 Q Did Manson ever discuss with you or others in your  
11 presence that there was nothing wrong with killing or words  
12 to that effect?

13 A Well, he discussed killings, about knives, you see.

14 Well, he discussed sounds that knives make, you  
15 see, when you are tearing someone's guts, or he discussed  
16 about how I could be done in, hung by a tree like this, you  
17 know, and then they all take acid and build a nice little  
18 bonfire and stick knives in me and then he discussed killings  
19 with me. You want me to tell you?

20 Q Did he ever tell you there was nothing wrong with  
21 killing the pig?

22 A There was nothing wrong with it because helter  
23 skelter was coming down according to the philosophical point of  
24 view that he had, you see.

25 Now, he tried to put that on people, you see, that  
26 there was nothing wrong with killing but, you see, that was  
27 because the point of view that he had to offer, you see.

28 Q About helter skelter?

1           A       Helter skelter, you see, and then freedom, the  
2 many things, the places that he wanted to go and take the  
3 people with, could offer the protection of it, you see.

4           Q       Killing was discussed, the rightness of killing  
5 was discussed in the context or in the framework of helter  
6 skelter; is that what you are saying?

7           A       Killing -- that is all he, you know, he started  
8 talking about helter skelter and then he started talking about  
9 there is nothing wrong and then he started about making love  
10 and makes you feel a little bit better, then he say, you know,  
11 why don't we go out and cut their heads off, you see, and then  
12 he started talking like that, you see, or why shouldn't we go  
13 out and kill somebody or why don't you jump over that big  
14 six foot fence, that tall one.

15                   One time he said, "You can jump up there and jump  
16 in there and grab yourself like this and throw yourself over  
17 and then you can go around the back door and sneak in and  
18 then you can take these people and tie them up and then come around  
19 in the front door and open the door and then we can go in there  
20 and feed them up acid," you know, " and then cut the kids and  
21 cut them all up," and cut, cut, cut, cut, cut, cut, you know.

22           Q       This is what he was telling you?

23           A       Well, he talked about killings, you know, he  
24 talked --

25           MR. BUGLIOSI: For the record could you describe what  
26 incident you are talking about?

27           MR. KEITH: I will clear the record up.

28           MR. BUGLIOSI: All right.

1 Q BY MR. KEITH: Were you at the ranch when this  
2 discussion took place?

3 A I was at the ranch -- after a day's work we went  
4 to the ice cream parlor. We came back, you see, we were on  
5 our way back to Spahn's Ranch, you see, and then he usually  
6 would do this -- he had this neighborhood picked out and then  
7 he even once with my family, you see, even once with my  
8 family he tried --

9 Q What do you mean "your family"?

10 A With relatives, you see.

11 Q You are not talking about the Manson family?

12 A No, no, no. I am talking about some relatives,  
13 some distance relatives that I have, you see.

14 So I wanted to look them up one night, you see,  
15 to see where they lived and, you know, just be in front of the  
16 house and say, "Wow, they live there," you know.

17 And then Mr. Manson said that we could do this and  
18 that and this and that, you know, and do them in. That is  
19 what the whole effect, comes down to the effect that we should  
20 go in there, you see, and cut their throats up and tie them  
21 up, you know.

22 And he asked me if they had a dog and this and  
23 that and this and if they had kids.

24 Q You are talking about your distant relatives who  
25 lived in a particular house?

26 A Yes. And not only that but in other neighborhoods  
27 too -- I can take you to the houses, you know, the houses,  
28 you know -- and he would drive real slow around, you know, and

1 he would start saying, "Look at them. They are tombstones.  
2 They are full of dead people. They are just waiting to die  
3 in their death beds," you know.

4 Then he would start picturing, you know, graveyards,  
5 you see, to the effect -- you see he goes to picture how the  
6 people were in there, in these somber homes, they were just  
7 waiting to die, you know.

8 And the many ways that, you know, we could go in  
9 there or I could go in there and tie these people up, you see,  
10 and then feed them acid, you know.

11 Then when they are coming onto acid we will take  
12 the kids and chop them up, you know, and when they are  
13 freaking out on acid, then we will go and chop them up too and,  
14 you know, even talk about cutting my head off sometime and  
15 sucking my big toe, you know.

16 Q Did he talk this way in front of, just in front of  
17 you or in front of other family members?

18 A There was other members --can I say this? There  
19 was other members there, you know, that he talked to. On some  
20 occasions he talked to me alone and some occasions he would  
21 talk to other members of the family.

22 Q Along this same vein that you have been telling  
23 us about?

24 A Yes.

25 MR. KEITH: Would this be a good time?

26 THE COURT: Yes.

27 We will have our morning recess.

28 Ladies and gentlemen, please heed the admonition

heretofore given.

(Recess taken.)

ERASABLE

BOARD

GAS COMPANY

11R-1

1 THE COURT: People against Watson.

2 Let the record show all jurors, counsel and defen-  
3 dant are present.

4 Mr. Keith, you may proceed.

5 MR. KEITH: Thank you, your Honor.

6 Q Mr. Flynn, did Manson ever discuss with you and  
7 the others the subject of everything that they had been told  
8 before is a lie?

9 A Yes, he discussed with me --

10 MR. BUGLIOSI: This is hearsay, your Honor.

11 MR. KEITH: With others present, Mr. Watson present?

12 MR. BUGLIOSI: Was Watson present?

13 THE WITNESS: I don't remember.

14 Q BY MR. KEITH: You don't remember these discussions  
15 or you don't remember whether Watson was present?

16 A I don't remember whether Watson was present at the  
17 moment, right now.

18 THE COURT: You mean he could have or he could not have  
19 been; you don't recall?

20 THE WITNESS: I don't recall right now, sir. He could  
21 have been and he could not have been.

22 THE COURT: Well, we have heard so much of it, go ahead,  
23 I will allow it. Go ahead.

24 THE WITNESS: Go ahead?

25 MR. KEITH: Please.

26 THE WITNESS: Would you repeat the question, please?

27 Q BY MR. KEITH: Did Manson ever converse with you,  
28 with others present, concerning the subject of whether

1 everything they had been told before had been a lie?

2 A Yes, he discussed it and he said that everything  
3 that you were told or taught by your parents or by the system  
4 was 180 degrees, you see, from what they taught you -- by that,  
5 I mean backwards, you see. He says everything that you have  
6 been taught by your parents and the system is wrong; it is all  
7 backwards; reality is all backwards.

12f.

12R-1

1 Q Did you ever have a discussion with Mr. Manson  
2 on the subject of his theory of finding out what people liked  
3 to do best and then give it to them, like dope or girls or  
4 candy?

5 A Yes. He said that he knew which ones were the  
6 ones and which ones weren't the ones, you see, for the things  
7 that he wanted to do, you see. That is what he discussed, you  
8 know, like he say "Well, I can look at a girl in the eye and  
9 know when she wants to go to bed or I can tell if a guy is  
10 willing enough to accept what I have to offer," you see.

11 Or, you know, "I can check him in this way," you  
12 know, "and you have to trick the mind and then bring out all  
13 the personality and then be with the being," you know.

14 And then he would feed them acid and most of the  
15 people that take acid, which are the young people, believe  
16 that this makes you aware of things -- well, it does make you  
17 aware, because you are under something different, you see. I  
18 mean it is new to the body.

19 So, you know, he used this as an entrance point,  
20 you know. He says that if you are aware enough to know that  
21 acid is doing these things, then maybe you are missing this and  
22 that, you see, and then he gets to put a couple of points in,  
23 which were the ones that they were missing.

24 And then the next time, you know, when they didn't  
25 feel the way they felt when they were on acid, you know, and  
26 they were going into normal state, you see, doing something,  
27 then he would come around and say that well, you are doing  
28 that and your karma is eating you up, you see, and you are



2-2  
@\_@  
1 going against this and that and here's some more acid, you  
2 know, and he kept doing this, you see.

3 Q Did Mr. Manson appear to make all the decisions  
4 at the Spahn Ranch?

5 MR. BUGLIOSI: Calls for a conclusion.

6 MR. KEITH: I will withdraw the question and rephrase  
7 it.

8 Q Did you ever hear Mr. Manson tell any of his family  
9 members what to do?

10 A Well, yes. It was apparent, yes, because on a few  
11 occasions I saw him hit some women, you know, for not doing as  
12 he said that they should do, because he was doing the trip  
13 that he was doing and they were going against it by going down  
14 the road, let's say.

15 He caught Stephanie one time going down --

16 Q That is Stephanie Schramm?

17 A I don't know her name, you see. He caught her  
18 going down the road and he says, "You are going down the road.  
19 You are going to pick up all that confusion. You are running  
20 off with my love. Come here."

21 And he grabbed her by her hair, you know. It was  
22 sort of like an understanding that they had, you know, and I  
23 talked about it with him right then and there, but they were  
24 so mad that neither one could see me or could understand what  
25 I was trying to have them look at, you know. There was no  
26 use in banging each other's heads.

27 Q Did you see Manson hit some of the girls?

28 THE COURT: He just said he did.

12-3

1

MR. KEITH: Stephanie Schramm.

2

THE WITNESS: I saw him.

3

4

THE COURT: You saw him hit a couple of girls; is that right?

5

THE WITNESS: Yes.

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13f.

L3R-1

1 Q BY MR. KEITH: Were you ever present in periods  
2 of time when there would be chanting going on?

3 A Well, I was around at times when there was music  
4 being made, you see, or chanting.

5 I can say that I was, yes.

6 Q And would there be a group present during these  
7 sessions?

8 A There'd be a big group.

9 Q Would this be in the evening, usually?

10 A This would be in the evening, yes; and sometimes  
11 during the day.

12 Q Would Mr. Manson lead the chanting or singing?

13 A Yes.

14 Q And would the family members in the group chant  
15 the same words that Manson chanted; in other words, follow him?

16 A Yes. Yes, he had one -- excuse me.

17 Q Go ahead.

18 A He had one where he said, "Well, okay, now,  
19 everybody grab each other's hand and now everybody close their  
20 eyes; now, everybody go -- (humming)"

21 And then, again, you see, when everybody would  
22 run out of breath then you do it two, three times; you go --  
23 (humming) -- and get in a pitch like -- I mean, in a peak,  
24 you see, to get in a peak like that; then after the third  
25 time and everybody would run out of breath, then everybody  
26 started going -- talking about anything that came to their  
27 head.

28 You see, this was therapy, you know; this was

13-2

1 mass therapy, and they'd say anything that came to their head,  
2 you know -- anything, you know, just -- most of the people  
3 just looked at each other and said, "What are we doing?" but  
4 they did; they'd go like that and they'd do that and they'd  
5 make music, they had chanting, they had the girls, then Charles  
6 Manson with a guitar, and then they had the chanting of the  
7 songs, you see, which was like something to build Charlie's  
8 voice in to have a place for it.

9 Q Was Watson present at these chanting or singing  
10 sessions?

11 A Yes.

12 Q Did this go on almost every evening?

13 A Yes.

14 Q I am referring to the singing and chanting.

15 A Yes.

16 Q The way you have described it?

17 A Yes.

18 Q And was there dope passed out at these sessions?

19 A Well, I don't remember seeing dope. Now, I am  
20 saying this, I don't remember seeing dope being passed on  
21 those sessions, you see. I remember Charles Manson tried to  
22 pass some to me, you see.

23 Q Did it appear to you that you -- you talked a  
24 good deal about acid here this morning; did it appear to you  
25 that people who attended the chanting and singing sessions  
26 were on dope.

27 A I don't remember if they were on dope. I don't  
28 remember. I don't remember right now.

13-3

1 Q Did Manson talk at all about the beneficial effect  
2 of acid?

3 A Yes, Charles Manson talked about beneficial effect  
4 of acid and the ways -- he introduced, himself, the ways that  
5 people could benefit themselves from it because --

6 MR. BUGLIOSI: I object unless Mr. Watson was present,  
7 your Honor.

8 THE COURT: Was Watson there at times when he would talk  
9 about beneficial effect of dope?

10 THE WITNESS: I don't remember, sir.

11 THE COURT: He might have been, might not have been;  
12 is that correct?

13 THE WITNESS: He might have been, might not have been.

14 THE COURT: I will allow it.

15 THE WITNESS: He talked about the acid and he talked  
16 about the change that it could offer you, you know; and that  
17 it could and it would give you a change and how you could get  
18 rid of the inhibitions. Well, just a whole thing of helter-  
19 skelter coming again, and then he'd talk a little bit more  
20 about inhibitions and being backwards from what they told you;  
21 then he'd talk about the pig again; then he'd talk about the  
22 black people.

23 Q BY MR. KEITH: Did this go on all the time?

24 A This went on all the time.

25 Q Were you ever at the Gresham Street house in  
26 Canoga Park?

27 A I was there once.

28 Q You never lived there?

13-4

1 A No, I went in through the front door, through the  
2 house and out the back door and came around and kept going.

3 Q And you were at the Barker Ranch, were you not?

4 A Yes -- were I not?

5 Q Were you at the Barker Ranch?

6 A I was at the Barker Ranch.

7 Q Did you go there after the August 16th raid?

8 A Yes. Yes, somewhere around there. I know that  
9 I was arrested, you see, and, yes, I went after; I went after  
10 because I got arrested first, then I went to jail and then I  
11 went to the desert.

12 Q When you say you were arrested, you were referring  
13 to the raid at the Spahn Ranch; is that right?

14 A Yes.

15 Q And how long did you stay at the desert?

16 A I just stayed in the desert, say a month, a month  
17 and a half --

18 Q Did you see Manson there?

19 A -- two months -- yes.

20 Q And did you notice any change in Manson?

21 A Well, he was -- yes, I saw a change in Manson.

22 Q Would you describe that, please?

23 A Well, he was wanting to -- he was pushing helter-  
24 skelter more and more and more, you see; and he talked about  
25 the arenas, the Roman arenas, and he talked about lions and  
26 he talked about everything; and he was a good actor, you see.  
27 Sometimes he'd make it really sound really like, "Ooh, they  
28 are doing it to me," you see; and he pushed more and

13-5

1 more helter-skelter and more and more helter-skelter -- I  
2 mean, heavier, too; and he was armed. He kept coming around  
3 with this coolies.

4 THE COURT: With his what?

5 Q BY MR. KEITH: Did you say "coolies"?

6 A Yes, with his friends.

7 Q You are talking about the family, when you use  
8 the word "coolies"?

9 A Yes; friends, yes.

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#14

1 Q Is that the way you referred to it?

2 A Well, yes, something like that. I would say with  
3 the people that he came with rather than coolies.

4 Q Use your own language.

5 A It sounds better when I use your language.

6 Q I would rather you would use yours.

7 Did the concept of helter skelter, so far as Manson  
8 was concerned, seem to be emphasized to you in the last few  
9 months while you were at the Spahn Ranch?

10 A Yes.

11 Q And then he kept on with it when he got to the  
12 desert and by "he" I am referring to Manson.

13 A Yes.

14 He told -- he used to say this too, he used to say  
15 that it was going to get so heavy, and that he wanted to go  
16 to the mountains, you see, and that he could put bottles and  
17 glasses and then when it would rain there would be enough  
18 water in them, and he could walk around the mountains, from  
19 ridge to ridge, and drink that kind of water, you know, and  
20 eat out there and live out there.

21 And he -- he would say that he could have winches  
22 on the cliff and run the cables down like that.

23 Q Winches did you say?

24 A Winches, you know, those things that --

25 Q With a crane?

26 A -- that you crank, that he could crank the dune  
27 buggies up on the hills, like he could come and do something  
28 downtown.



14-2

1 He said to me one time that we would go downtown  
2 and look over the hill like an Indian and look down on the  
3 town like that and then we would spot all the little girls  
4 down there and then we will go down there in the dune buggy  
5 and snatch one of them like that and take off and run into  
6 the desert, and then they would get to this wall and then we  
7 would have a winch up there and then we would hook the dune  
8 buggy to the winch and lift it up, then they would be following  
9 us and they would ride up to this wall and they wouldn't know  
10 where we went.

11 Q Did he tell you that while you were in the desert?

12 A Well, he told me that in the desert.

13 Q Did Mr. Watson appear to you to be subservient to  
14 Manson when you knew him?

15 A Mr. Watson appeared to me subservient -- you mean  
16 being --

17 Q Under his power.

18 MR. BUGLIOSI: This calls for a conclusion. I think he  
19 can ask him what he did but it is a conclusion to say that he  
20 is subservient.

21 THE COURT: Yes. I think that takes in too much. Did  
22 Watson give orders to Manson or did Manson give orders to  
23 Watson?

24 THE WITNESS: Manson gave Mr. Watson orders.

25 THE COURT: Did Watson appear to obey his orders?

26 THE WITNESS: Yes.

27 Q BY MR. KEITH: Did you ever hear Mr. Watson express  
28 any ideas of his own that weren't Manson's?

14-3

1 A No. Mr. Watson, I don't recall him talking any  
2 ideas about Manson to me at the moment now but, you know, he  
3 seemed to me, because you are asking me, you see what I think,  
4 you see, that he was doing what Mr. Manson was doing because,  
5 you know, the dune buggies were there and there was motorcycles  
6 and there was welding machines and they were designed with the  
7 purpose, they were there with a purpose to do the dune buggies  
8 because the helter skelter was coming down, you see, and so  
9 Mr. Manson was pushing helter skelter.

10 He had people doing things or vehicles to go to  
11 the desert because helter skelter was coming, you see, and  
12 so he was telling everybody do this and do that.

13 Then he would say do this dune buggy. Then the  
14 dune buggy was done and then he would say, "Well, that is my  
15 dune buggy and if anybody wants one all you have to do is  
16 go downtown and get one, you see."

17 And then the dune buggy would be repaired up at  
18 the ranch or transformed or whatever you wanted to call it.

19 Q When you first met Mr. Watson, how would you  
20 describe him?

21 A Gentle, gentle, pleasant, you know, physically  
22 built, you know, not bulgy, you know.

23 He was built nice, you know. He had a nice cool  
24 manner.

25 Q Did you notice any change in his personality during  
26 the months that you knew Mr. Watson?

27 A Yes. In the months that I knew Watson or in the  
28 period of time in which I knew Mr. Watson I did notice a change

14-4

1 in his appearance, you see.

2 Q What change did you notice in his appearance over  
3 a period of time?

4 A Well, when he came there he looked to me like he  
5 was pretty clean, you know. He was pretty clean and, you know,  
6 he stayed pretty clean, occupied with things that were there,  
7 you know, like cars and stuff like that.

8 Q Did he physically change in any manner?

9 A Well, now you mean?

10 Q No, not now. While you knew him at the Spahn  
11 Ranch and Barker Ranch.

12 Q Physically, well, physically he kind of grew  
13 shaggy after while and kind of decomposed, this whole thing,  
14 you know, that appearance that he had, you know, that soft  
15 hair and soft approach and all that kind of decomposed.

16 And then his hair got longer, you know, and then  
17 got shorter and then got longer and he kind of changed, yes,  
18 physically in that respect. You see it manifested like that,  
19 you see.

20 Q Did he change or did you notice any change in him,  
21 not only physically but let's say in the sense of his  
22 personality or manner or demeanor?

23 A Yes.

24 Q What did you notice in him?

25 A Well, first of all I noticed that, you know,  
26 started noticing the way he would do things and the way he  
27 ran, you know, and then his eyes, you know, his eyes were very  
28 big.

1 Q Are you talking about the pupils of his eyes?

2 A I am talking about the eye period. I am talking  
3 about the eyes being big.

4 Q As you are staring at us now?

5 A Like that, you know, but bigger than that, you  
6 know, than these, you know, and that was a change, you know.  
7 There was a change. I don't know what it was but I feel, you  
8 know, it was right there.

9 Q Did Mr. Watson spend most of his time during the  
10 day, if you know, working on these dune buggies both at the  
11 Spahn Ranch and in the desert?

12 A Yes, at Spahn Ranch he did, and at Barker Ranch  
13 I helped him turn the dune buggy to the side one time. He  
14 would work on that and he kind of knew dune buggies and knew  
15 cars.

16 Q Did he continue to have these staring wide-open  
17 eyes at the Barker Ranch?

18 A Well, I felt that he did. That is what I saw, you  
19 see.

20 Q Did you see the same thing at the Spahn Ranch, his  
21 staring eyes, bulging eyes?

22 A Yes. That is when I took him to Olancha from  
23 Spahn Ranch.

24 Q Would this be before the raid, the August 16th  
25 raid when you took him to Olancha?

26 A I think so, yes.  
27  
28

15R-1

1 Q Did he have bulging eyes then, to your recollection?  
2

3 A Well, I saw him running out there, you see. He  
4 certainly got my attention when I saw him running like this;  
5 and then when I took him to Olancho from Spahn's Ranch, you  
6 see, we got stopped by some policemen, you see.

7 We was in this truck; Charlie had given me a  
8 gun. He says, "If anybody stops you, shoot him," you see.

9 Q This is Charlie Manson?

10 A Charlie Manson, you see; so Tex Watson was sitting  
11 there in one corner of the truck and David --

12 MR. KAY: Hannum?

13 THE WITNESS: -- Hannum; David Hannum was driving, you  
14 see, and Mr. Watson, you know, he's had these big eyes like  
15 that, he's just sitting there, you know. He's quiet and tense,  
16 and then they inspected the car -- the truck, you see -- and  
17 then we got out of town and then he mentioned that one of the  
18 engines was hot, you see. He said, "Whew."

19 MR. BUGLIOSI: You say "he," about whom are you talking?

20 THE WITNESS: I am talking about Mr. Watson. He men-  
21 tioned that -- something about one of the engines was hot, you  
22 see.

23 Then we drove to Olancho where David and I dropped  
24 him, and his eyes were big on the way, you see -- no sleep --  
25 and it was a change; there was a big change in there; you  
26 could feel it -- to look at it, too.

27 You could describe it if you was there, too; and,  
28 you know, if you knew him, there was a change.

15-2

1 Q BY MR. KEITH: When did you first notice this  
2 change, that is sort of exemplified by the saucer-like eyes,  
3 just gradually or over a period of time, as you got to know  
4 Watson?

5 A Well, I knew him, you see; I knew him from the  
6 ranch, you see, and he was -- he had a cool way with him,  
7 you know. He had a cool way, not careless but soft way of  
8 doing things; and then this incident, running, that was really,  
9 you know, whew --

10 Q Strange?

11 A Strange. I mean, the way it happened, you know;  
12 the way it happened, because there was a lot more there, you  
13 know.

14 THE COURT: Mr. Flynn, I don't like to stop you, but  
15 please try to answer the question and then stop.

16 THE WITNESS: Yes, sir.

17 THE COURT: Mr. Keith, will you take control of your  
18 witness, please?

19 MR. KEITH: Yes, your Honor.

20 Q Did this change that you noticed in Watson happen  
21 gradually or all of a sudden?

22 A Well, it depends what change, you see, because  
23 they went through many changes, you see.

24 Q I am talking about more the change in his demeanor,  
25 his conduct.

26 A It happened just like that, you know. It happened  
27 just like that and the whole ranch just almost went like that,  
28 too.



15-3

1 Q Do you know when this was?

2 A Well, about a day or two days; somewhere around  
3 in there; the day or two before we went up to Olancho -- two  
4 days, three days, four days.

5 Q And up until that time was Watson a very quiet  
6 person, would you say?

7 A Well, I'd say, you know, he was -- you know, when  
8 I noticed it, that's when I noticed it; and I didn't say  
9 whether it is 2:00 o'clock and 15 seconds; I just noticed it.

10 Q You noticed mainly the bulging eyes?

11 A Yes.

12 Q And there was some feel you had about him at that  
13 time, apparently?

14 A Some what, sir?

15 Q Well, you had a feeling about him --

16 A Well --

17 Q -- that is hard to describe?

18 A There was something unusual, you see. This con-  
19 duct was unusual, you know, it was unusual for him, from  
20 where I was looking at him, it was unusual.

21 MR. KEITH: I don't believe I have anything further.

22  
23 CROSS-EXAMINATION

24 BY MR. KAY:

25 Q I won't be too long, Juan.

26 Defense took me by surprise at the beginning  
27 when you described yourself as a cowboy and a ranch hand.  
28 That's not usually how you described yourself at Spahn Ranch,

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A No.

Q How did you describe yourself?

A Horse shit shoveler.

Q Now, Juan, I show you People's 40; have you seen that before?

A Yes.

Q Did you see it at Spahn Ranch?

A Yes.

Q Did you ever see Mr. Watson fire that out at Spahn Ranch?

A Yes.

Q On how many occasions did you see Mr. Watson fire People's 40 out at Spahn Ranch?

A I can recall one occasion down in the creek.

Q And what was he firing it at?

A There was some cans or some trees down there, something. It was just down in the creek, you know.

Q Behind the buildings?

A Behind the buildings. You went down the corral where Chipper's corral was. This was a horse -- you went down like that across the creek and there was a little flat place there that had a whole bunch of trees over it, and that's where they used to fire it.

Q Now, when you were out at Barker Ranch did you see Mr. Watson carry a gun out at Barker Ranch?

A Not out of Barker Ranch; but I saw him with a gun at Myers' Ranch.

Q Where is Myers' Ranch located in relation to



15-4

1 Barker's Ranch; they are right around the same are,  
2 aren't they, or about 10 miles from each other?

3 A No, I'd say about two to three hundred feet, 400  
4 feet; somewhere in that vicinity. They were pretty close.

5 Q And what type of a gun was that?

6 A That was a .45.

7 Q .45?

8 A Colt .45, Italian.

9 Q Now, have you ever seen a rope that looks similar  
10 to People's 41?

11 I am showing you People's 41 now; have you ever  
12 seen a rope out at Spahn Ranch that looked similar to People's  
13 41?

14 A Yes.

15 Q Did you ever help Mr. Watson tie something up with  
16 a rope that looked similar to People's 41?

17 A Yes.

18 Q What did you help him tie up?

19 A I helped him tie up a dune buggy and I helped him  
20 tie up motors -- or, motor -- and I helped him tie up a whole  
21 bunch of things in the trunk with it because it was a long  
22 rope.

23 Q Now, on your trip to -- well, does this look iden-  
24 tically like the rope that you helped Mr. Watson tie things up  
25 with?

26 A Yes.

27 Q And you have had this, the rope you helped Mr.  
28 Watson tie things up with, in your hand, haven't you?

15-5

1           A     Yes.

2           Q     Now, on your trip to Olancho with Mr. Watson, you

3     said that he said that one of the dune buggy engines was hot.

4     What do you mean by the word "hot"?

5           A     Well, that it was out of a car that didn't belong

6     to the ranch or didn't belong to the family.

7           Q     You mean a stolen car?

8           A     I believe, yes.

9           Q     Did Mr. Watson seem relieved after the police

10    officer left?

11          A     Yes.

12          Q     That was what, a highway patrol officer?

13          A     There was two or three cars of them.

14          Q     Two or three patrol cars?

15          A     Patrol cars, you see.

16          Q     Now, when you were at the ranch I take it that you

17    had a chance to observe a lot of the girls at the ranch,

18    members of the Manson family at the Spahn Ranch; is that right?

19          A     Yes.

20          Q     How were the girls treated in the Manson family?

21          A     Well, they were treated according to the way

22    women should be treated, according to Mr. Manson's way.

23          Q     How was that, as a slave?

24          A     Well, as -- there's a word for it in the English,

25    not so crude --

26          Q     Subservient?

27          A     Subservient, something like that, you know; if

28    you tell them something, they have to do it, that's it.

15-5

1 Q Did you ever observe any of the family, the girls  
2 in the family give Mr. Manson any orders to do anything out  
3 at Spahn Ranch?

4 A I beg your pardon?

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#16

1 Q Did you ever observe or hear any of the girls in  
2 the Manson family ever give Mr. Watson any orders to do  
3 anything out at Spahn Ranch?

4 A I don't -- I never seen them do that.

5 Q Did you ever see any of the girls give anybody,  
6 any men, any man in the family, orders to do anything?

7 A No. That was against what Charles Manson said.  
8 He said, "Woman-man, You tell woman," you see, "and woman does  
9 or else she gets her head knocked off," you see.

10 Q Now, you were telling us about an incident after  
11 you went to an ice cream parlor with Mr. Manson and some other  
12 members of the family.

13 First tell us who was with you at this incident  
14 besides you and Mr. Manson.

15 A Well, there was Mr. Watson and there was a couple  
16 of other people in there. There was Danny DeCarlo and there  
17 was somebody else there, Steve Grogan, I believe was there too.

18 Q Now, you drove up in front of some house?

19 A Yes.

20 Q All right. Who was driving?

21 A Mr. Manson was driving.

22 Q All right.

23 When you pulled up in front of this house, what  
24 did Mr. Manson say and what did anybody else say if they said  
25 anything?

26 A Well, Mr. Manson wanted everybody, you know, first  
27 he came out --- he said, "Well, let's go in there and see  
28 what they are doing in there."

16-2

1           You see, he started talking about pigs, you see.  
2 He started talking about pigs and then when we came to that  
3 spot, he said, "Let's see what they are doing."

4           And then he told me and he told a couple of others,  
5 you know, including Mr. Watson, to get out and go see what  
6 they were doing or what was going on in there.

7           Q       Inside the house?

8           A       Inside the house, you see.

9           So Mr. Watson got out and he went in the yard, you  
10 know, and he looked around.

11           There was this big boat sitting in front of the  
12 yard and it was at night and there was some lights on the  
13 house and then he went in there and came back out, you know,  
14 and he was the only one that went out, you know, that I can  
15 remember right now.

16           Q       When you say "he" you mean Mr. Watson?

17           A       Mr. Watson, but he asked me and I told him, "No,"  
18 you know.

19           Q       What did he ask you?

20           A       Well, he told me to go in there too, you see. That  
21 is trespassing on somebody else's property.

22           Q       Who did? Watson or Manson?

23           A       Manson, sir.

24           Q       And what did Mr. Manson say that you were going to  
25 do to these people, to the people in the house?

26           A       Well, he felt that they were pigs and they should  
27 be done accordingly.

28           So according to him was going in there and tying

16-3

1 them up, filling them up with acid and then cutting them up.  
2 You know I remember that neighborhood now.

3 Q You remember the neighborhood?

4 A Yes.

5 Q Where is it?

6 A It is in Granada.

7 Q Granada Hills?

8 A Or the Porter Ranch.

9 Q The Porter Ranch?

10 A The Porter Ranch. That is what it is.

11 Q Out in the San Fernando Valley?

12 A Yes, right there. That is where it is.

13 Q Who refused to do this?

14 A I refused to do this.

15 THE COURT: Anyone else?

16 THE WITNESS: Well, there was Danny DeCarlo with us.  
17 There was Steve and I and Mr. Watson and Charles Manson.

18 I refused. The other people didn't go out, and  
19 he went out to look at the boat, you know, or he went in the  
20 yard and then he came back out and Mr. Manson stayed in the  
21 car too, so he couldn't refuse himself, so he stayed in the  
22 car.

23 THE COURT: When you people refused to tie up these  
24 people and cut these people up, didn't you disobey Manson's  
25 orders then?

26 THE WITNESS: Well, he felt that he was saying orders,  
27 you see, but what he was really saying is that "I have a way  
28 of feeling that I am right about the way I am feeling, and

16-4

1 this is what should happen to these people," you see, because  
2 then he would preach about helter skelter and all the love  
3 that they had subdued in them..

4 THE COURT: When this didn't happen to these people,  
5 what did he say?

6 THE WITNESS: What did he say when they didn't go in  
7 there and cut them up?

8 THE COURT: Yes.

9 THE WITNESS: Oh, then, he just go around and look for  
10 more houses and keep talking about the same subject, you see,  
11 and keep talking about the same subject and then the night would  
12 go over, you know, and then the next day it would happen the  
13 same thing.

14 He would keep talking and talking and talking  
15 about it until it, you know, manifested.

16 Q BY MR. KAY: Juan, to get this straight, Mr.  
17 Manson told everybody to get out of the car and Mr. Watson  
18 got out of the car?

19 A Mr. Watson, yes.

20 Q Mr. Watson was the only one that got out of the  
21 car?

22 A Yes. Mr. Watson was the only one that went in  
23 there, in that yard where the boat was.

24 Q And this yard, this house that you are telling us  
25 about, was this the house where your relatives lived?

26 A No, but it was around that neighborhood, you see,  
27 around that neighborhood and you see I kept looking in there  
28 too to see if I could find my relatives house.

16-5

1 Q Did you ever see Mr. Watson take any drugs?

2 A No, not like this (demonstrating). I never saw  
3 Mr. Watson take no drugs.

4 Q And you saw him under the influence on this one  
5 occasion that you told us about where he ran around?

6 A Well, it appeared to me that it was dope and it  
7 appeared to me that it was a change, you see, because --

8 Q At least something was different?

9 A Something was different, you know, something was  
10 different. There was a flare, you know.

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16A

1 Q Now, you see Mr. Watson over here today. He  
2 didn't look anything like that when you knew him, did he?

3 A No.

4 Q How has he changed? He weighed a lot more, didn't  
5 he?

6 A Yes.

7 Q About how much more would you estimate that he  
8 weighed?

9 A Oh, I would say -- it is hard to tell, you know,  
10 by his fingers and his feet, looks about 50-60 pounds,  
11 something like that, somewhere in there.

12 Q He was fairly strong, wasn't he? He weighed 50  
13 or 60 pounds more when you knew him; is that right?

14 A Yes.

15 Q He was fairly strong, wasn't he?

16 A Yes.

17 Q He did a lot of heavy physical work out there at  
18 the ranch, didn't he?

19 A Well, he did physical work with respect to dune  
20 buggies and cars.

21 MR. KAY: Would this be a good time? Maybe I just have  
22 a couple more questions.

23 THE COURT: If we can I would like to excuse him.

24 Q BY MR. KAY: Besides your occupation you had at  
25 Spahn Ranch you are also an actor, aren't you?

26 A I have done some of that.

27 MR. KAY: I have no further questions.  
28

16A-2

## REDIRECT EXAMINATION

BY MR. KEITH:

Q This .45 at the Myers Ranch that you told us that Mr. Watson had, was that gun given to him by Mr. Manson?

A Yes. Sir, in what location?

Q At the Myers Ranch.

A At the Myers Ranch the gun that was passed at the dinner table was passed to Bruce Davis. Bruce Davis passed it to Mr. Watson and Mr. Watson took it like this and he --

Q In the palms of his hands?

A In the palms of his hands, like this, and he looked at it and then he, you know, kind of smiled and then he passed it to me, you see, but he didn't go like the others. He didn't go like that.

Q He didn't go like what?

A He didn't point it at me. He just took it like this, you see.

Q Did the others point it at you?

A Yes. Well, except Danny DeCarlo, he was --

Q Was this just before you left the desert, this incident?

A This is before I left.

Q Just before I mean.

A Well, it was around before or I don't know what time. I know I went after that. I went to the Barker Ranch, you see.

MR. KEITH: I don't have anything further.

## RE-CROSS-EXAMINATION

BY MR. KAY:

Q Just one question, Juan.

Also up at the Myers Ranch, when you say that he was carrying the gun, the .45, he was carrying that when you and he went up to talk to Paul Crockett one time; isn't that true?

A Yes.

Q And where was he carrying it when you were talking to Mr. Crockett?

A I believe he was carrying it in his pants pocket or was it in his pants? I don't remember too clearly that, you know, that incident, but I know it was there, the .45 was there because when we went and Charlie says, "Make that star dance."

I said, "Yes, the star is dancing."

"And now to the left."

And I said, "It is dancing to the left."

"And to the right."

"It is dancing to the right."

And then he asked me that night, he said, "Do you have a knife," you see, and he was talking about Paul Crockett that night, about Paul Crockett taking his young love and programming him.

17R-1

1 Q Well, what does this have to do with Mr. Watson  
2 carrying the .45?

3 A Well, because the whole, the whole effect of the  
4 conversation was to the point that Paul Crockett should be  
5 done, and then Charles Manson finds the ways and how he should  
6 be done.

7 Q You say "done"; you mean "done in"?

8 A Done in, you see.

9 Now, we was to go to Barker Ranch --

10 Q Is this why Mr. Watson was carrying the .45?

11 A Well, I don't know. You know, the .45 was there;  
12 Mr. Manson handed it over to him and he took over the car, he  
13 was driving.

14 Q Who is "he"?

15 A Mr. Watson.

16 Q Yes.

17 A Mr. Watson; and then the car kept stalling and we  
18 kept going back into the ranch, then we'd come back out; then  
19 we'd go back into the ranch and then we'd come back out because  
20 it kept stalling, you see.

21 Q When you'd go back to the ranch, is that where  
22 Mr. Crockett was?

23 A Where Mr. Crockett was, you see; and then Mr.  
24 Watson would stand there and he would talk to him, you see.

25 Q Talk to who, Crockett?

26 A To Crockett; and he would stand there, you know,  
27 and just stand there and then finally we got the thing running,  
28 you see, which was very nice; and then we went down the creek.

17-2

1 We pulled out a parachute and we slept in the sand.

2 Q Well, now, when you and Mr. Watson were standing  
3 talking to Crockett, you were pretty nervous, weren't you?

4 A Well, yes.

5 Q You thought Mr. Watson was going to do something,  
6 did you not?

7 A Well, because Charlie Manson put all these things  
8 in there, in the many ways that this man should be done in and  
9 why he should be done in; and then handing over the knife to  
10 me, you see, handing over the gun to him, you see, and then  
11 going down there -- just the mere thought of thinking about it,  
12 you know -- and I stood aside from him, you see, because I  
13 was scared, you see, not only of, you know, something happening  
14 there, but I wanted to prevent it, too.

15 Q Well, you wouldn't have killed Mr. Crockett, would  
16 you?

17 A No, but I sure would have knocked the shit out of  
18 him, you know, if he would have tried.

19 Q Who, Mr. Watson?

20 A Yes.

21 MR. KAY: I have no further questions.

22  
23 REDIRECT EXAMINATION

24 BY MR. KEITH:

25 Q Mr. Watson didn't try to shoot Mr. Crockett, did  
26 he?

27 A No.

28 Q Mr. Watson just stared at him, didn't he, at Mr.

17-3

1 Crockett?

2 A Mr. Watson stared at Mr. Crockett and then Mr.  
3 Watson asked Mr. Crockett for some tools; and then Mr. Watson  
4 went back to the car, he kneeled down underneath it, you know,  
5 and did something to it; and then we started the car again.  
6 He started the car, we went 15, 20 feet, the car stopped again;  
7 we went back to the ranch, we talked with Mr. Prockett -- not  
8 Prockett, Crockett, you see -- then Mr. Watson again talked  
9 with Mr. Crockett, you see; and this happened for two or three  
10 times, you see, and then finally the car got running and we  
11 went down the creek and we slept down there underneath the  
12 parachute in the sand.

13 Q Did this incident occur after Manson told you and  
14 Watson that Crockett ought to be done in?

15 A This was after, you see. Now, Mr. Manson -- Mr.  
16 Manson always talked about Mr. Crockett, you see. He talk  
17 about Mr. Crockett as being a threatening point to the people  
18 who were under his belief, to the people who were under his  
19 agreement that were going there, because there was three people  
20 there that he, Mr. Manson, felt that they were under his orders,  
21 they were under his agreement and they were under his will and  
22 against his will because Mr. Crockett had a way of explaining  
23 something of the unnatural which he, Mr. Manson, only, saw,  
24 you see; so that there became a threat to him, you see,  
25 because he wanted the men -- he wanted the men to satisfy the  
26 women, the men to have the women there so he could have some  
27 women, you see; and then he wanted the men there because he  
28 wanted them to do the work, you see, that he couldn't have

7  
13-4  
1 done, himself, you know.

2 Q All right; but, at any rate, Mr. Watson did not  
3 try to shoot Mr. Crockett?

4 A No. No, he didn't come out with, you know -- I  
5 just stood by him like that, you know, and I watched. I  
6 watched him and he just stood there and he asked him for his --

7 Q For the tool?

8 A -- for the tools, you know.

9 THE COURT: Okay, we have been through that.

10 MR. KEITH: Okay.

11 Q Did you see Mr. Watson when he went into this  
12 yard where the boat was, press a doorbell?

13 A I don't remember. I don't remember if he pressed  
14 a doorbell or not. I saw him going to the yard, you know,  
15 then he looked around, come out, tiptoeing, you know, from  
16 the yard.

17 He says, "There is nothing there," or something;  
18 he said something, and then we get in the car and Charlie  
19 started talking right away, "Well, the pig, the pig, the pig,  
20 the pig."

21 Q All right. We have been through that.

22 Did Mr. Manson have anything to say about Mr.  
23 Watson's failure to do away with Crockett, if you know?

24 A I don't remember.

25 MR. KEITH: I have nothing further.

26 MR. KAY: Nothing further.

27 THE COURT: Thank you; you may be excused.

28 Ladies and gentlemen, we will recess at this

time until 1:30 and, once again, heed the admonition heretofore given.

(Noon recess.)

18f.



#18

1 LOS ANGELES, CALIFORNIA, WEDNESDAY, SEPTEMBER 15, 1971; 1:30 P.M.

2  
3  
4 THE COURT: People against Watson.

5 Let the record show all jurors are present, all  
6 counsel and the defendant are present.

7 Proceed with your next witness.

8 MR. BUGLIOSI: I would like to recall Mr. Crockett for  
9 a couple of questions on cross-examination.

10  
11 PAUL CROCKETT,

12 recalled as a witness on behalf of the defendant, having been  
13 previously duly sworn, testified further as follows:

14 THE CLERK: You have been previously sworn. Would you  
15 retake the stand and state your name for the record.

16 THE WITNESS: Paul Crockett.

17  
18 CROSS-EXAMINATION (CONTINUED)

19 BY MR. BUGLIOSI:

20 Q Mr. Crockett, when you knew Mr. Watson up in the  
21 Death Valley area, did you ever see him give any orders or  
22 instructions to any of the girls in the family?

23 A Only one time.

24 Q What was that occasion?

25 A When we were changing the motor that I discussed  
26 earlier, the girl would bring us the tools and he would ask  
27 for this or that or tell her to bring this or that.

28 Q When you knew Mr. Watson in the Death Valley area,

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1 this would be September and October of '69 or all of September?

2 A All of September, most of it.

3 Q And early October?

4 A Well, yeah, it would extend into the first day of  
5 October.

6 Q Did you notice anything unusual about his eyes?  
7 Did they appear to be bulging out or staring or anything like  
8 that?

9 A Not that I recall.

10 Q Appeared to look normal to you?

11 A Right.

12 Q How much would you estimate Mr. Watson weighed in  
13 September of 1969 in the Death Valley area?

14 A I would say somewhere between 160 and 180 pounds.

15 Q Did he appear to be strong to you?

16 A Yes.

17 Q Did he appear to be well coordinated?

18 A Physically, yes.

19 Q You see him in court here, of course, seated at  
20 the end of the counsel table. Did he look in September of  
21 1969 the way he looks now?

22 A No.

19

#19

1 Q In what way?

2 Well, let me ask you this: If you had not seen  
3 him in court here and you bumped into him out in the street,  
4 would you have recognized Mr. Watson the way he looks now?

5 A I don't believe I would have recognized him, no.

6 Q He looks that different?

7 A Well, at the time I knew him he hardly ever wore  
8 a shirt, had long hair and I just wouldn't have recognized him.

9 Q And he is much thinner, now, of course?

10 A Right.

11 Q I kind of detected a pause when you were asked if  
12 Watson were subservient to Manson; then you said, "I would say  
13 yes."

14 What did you mean by this?

15 MR. KEITH: I object to the question.

16 MR. BUGLIOSI: If there was a pause --

17 MR. KEITH: I don't recall any pause.

18 MR. BUGLIOSI: I will withdraw that and say this:

19 Q What did you mean when you said, "I would say yes"?  
20 Were you qualifying your answer at all?

21 A In a slight degree, because I saw him get  
22 agitated with Charlie one time -- not opening or with words  
23 or anything else, but he just kind of drew back and did not  
24 want to do what Charlie told him to do, not with words.

25 Q What incident --

26 A Not with words -- but when Charlie asked him to  
27 change the motor, he didn't want to do it.

28 Q You could tell that Mr. Watson didn't want to change

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1 the motor?

2 A Right.

3 Q And he evidenced this by his conduct?

4 A Well, it's kind of like feelings, I mean -- like  
5 all women know it; they sense that this person does not want  
6 to do what they are told to do or asked to do, or something  
7 like that.

8 MR. BUGLIOSI: Thank you; no further questions.

10 REDIRECT EXAMINATION

11 BY MR. KEITH:

12 Q Mr. Watson did change the motor, I gather?

13 A Right.

14 Q And did you ever see Watson take any dope at the  
15 Barker Ranch?

16 A Well, they used to smoke quite a bit of marijuana.

17 Q Smoked marijuana; you saw him do that, I take it?

18 A And he was high on something one night, sitting in  
19 a chair, but --

20 Q Did you ever see him drop any acid at the Barker  
21 Ranch?

22 A I don't recall ever seeing anyone drop any acid.

23 Q You didn't see any acid while you were living at  
24 the Barker Ranch?

25 A I never did, no; I saw people when they were on it,  
26 but I never saw any acid or anyone take it.

27 Q You saw marijuana at the Barker Ranch, however?

28 A They were smoking, yes.

1 Q But you didn't see anybody take any pills?

2 A No.

3 Q And did you see any pills at the Barker Ranch  
4 while you were there?

5 A Never. They made it a point for me not to see it.

6 Q Well, did you see -- had you ever seen anybody  
7 take acid and see how it affected them?

8 A I have seen people that were on it, yes.

9 Q At the Barker Ranch?

10 A At the Barker Ranch.

11 Q When was that?

12 A I don't have any way of knowing they were on acid;  
13 I was only told they were.

14 Q When was this?

15 A In that same period after Charlie and the group  
16 came up.

17 Q During that period I take it you never saw Watson  
18 take any acid.

19 A He sat in a chair one night for a great period of  
20 time and never moved, just sat there and looked straight ahead.

21 Q You didn't know what was affecting him?

22 A I knew something was going on but I didn't know  
23 what it was.

24 Q He just stared straight ahead for a number of  
25 hours?

26 A He just sat there.

27 Q He didn't say anything?

28 A He didn't say anything to anyone.

1 Q Just sort of immobile?

2 A Just sort of immobile; he just sat there.

3 Q You didn't know what was the matter with him?

4 A Oh, I had an idea.

5 Q Well, but, as a matter of actual fact --

6 A As a matter of actual fact, no.

7 MR. KEITH: I don't have anything further.

8 MR. BUGLIOSI: No further.

9 THE COURT: You may be excused, sir.

10 THE WITNESS: Thank you, sir.

20

#20

1 MR. BUBRICK: Dr. Bohr,

2 THE CLERK: Raise your right hand, please.

3 You do solemnly swear the testimony you may give  
4 in the cause now pending before this court shall be the truth,  
5 the whole truth, and nothing but the truth, so help you God?

6 THE WITNESS: I do.

7  
8 VERNON BOHR,

9 called as a witness on behalf of the defendant, having been  
10 sworn, testified as follows:

11 THE CLERK: Will you take the stand and be seated,  
12 please?

13 Will you state and spell your name, please.

14 THE WITNESS: Vernon Bohr, B-o-h-r.

15  
16 DIRECT EXAMINATION

17 BY MR. BUBRICK:

18 Q What is your business or profession?

19 A I am a psychiatrist.

20 Q Will you tell us something about your graduate  
21 work? Where and when you did that?

22 A Yes. I have a Ph.D from the University of  
23 Colorado.

24 Q In what field?

25 A In the field of physiology.

26 Q When did you get that?

27 A 1952.

28 Q Do you also have an M.D. degree?

1 A I have an M.D. degree.

2 Q Where and when did you get that?

3 A I got that from the Loma Linda University in 1960.

4 Q Did you do some internship in connection with your  
5 Doctorate degree?

6 A Yes. After completing my medical degree, I did  
7 one year of internship at the Loma Linda University Hospital.

8 Q Have you done some residency work as a physician?

9 A Yes. I did three years of residency training in  
10 psychiatry with the State of California at several hospitals.

11 Q Will you tell us what hospitals you were at,  
12 please?

13 A Yes; Metropolitan State Hospital, Pacific State  
14 Hospital, Atascadero State Hospital and the USC Los Angeles  
15 County General Hospital.

16 Q And you did function as a psychiatrist at all of  
17 these institutions you mentioned; is that correct?

18 A Yes, I did.

19 Q Are you a diplomate --

20 A Yes,

21 Q -- in psychiatry?

22 A Yes, I am.

23 Q What does that involve, Doctor?

24 A A psychiatrist who has finished his training and  
25 who has been in practice two years has to take a two-part  
26 examination, roughly a day each, and if he successfully passes  
27 this, he is certified as a specialist by the American Board  
28 of Psychiatry and Neurology.



1 Q Who composes the board that determines whether or  
2 not one will be admitted as a diplomate?

3 A Well, the board requirements themselves are a  
4 function of the specialty society, namely, the American  
5 Psychiatric Association, the American Medical Association,  
6 and the American Hospital Association.

7 Q Do you have some present practice or specialty?

8 A Yes. At the present I am medical director of a  
9 hospital, the Community Mental Health Center, called  
10 Ingleside Mental Health Center.

11 Q Does the hospital specialize in the treatment of  
12 any particular group of people?

13 A Yes. Ingleside for about 11 years has specialized  
14 in the treatment of adolescence and young adults.

15 Q Do you number among the patients there people  
16 involved with drug abuse problems?

17 A Yes.

18 Q About how many would you say you have seen there?

19 A I'd say approximately 1500.

20 Q Since you have been associated with Ingleside?

21 A Yes.

22 Q Are any of them to your knowledge persons who  
23 suffered from the effect of LSD?

24 A Yes, a great number.

21R-1

1 Q Have you ever seen anybody under the effects of  
2 LSD in the institution?

3 A Yes.

4 Q How about amphetamines, do you have persons there  
5 who have been affected by the abuse of amphetamines?

6 A Yes.

7 Q And how about speed?

8 A Ma-hum, which would be amphetamines plus other  
9 stimulants.

10 Q Are you presently teaching in any capacity,  
11 Dr. Bohr?

12 A Yes, I am assistant clinical professor of psychiatry  
13 at the USC School of Medicine and I am clinical professor of  
14 psychiatry of the Fuller Graduate School of Psychology.

15 Q And are you listed anywhere, as far as you know,  
16 in any other kind of publications?

17 A Yes, I am listed in Who's Who among American men  
18 of science and Who's Who in the west.

19 Q Have you published any articles, Dr. Bohr?

20 A Approximately two dozen.

21 Q In what fields?

22 A Most of them in the field of physiology and neuro-  
23 physiology, but several in the field of psychiatry.

24 Q Did you examine Mr. Watson --

25 A Yes, I did.

26 Q -- the defendant in this case?

27 Can you tell us when that examination took place?

28 A Yes, on May 12th and May 31 in 1971.

21-2

1 Q How much time did you spend in your examination of  
2 Mr. Watson?

3 A Approximately five hours, all told.

4 Q In total?

5 A Yes.

6 Q And how was the examination conducted, Dr. Bohr?  
7 Was it question and answer or --

8 A Yes, it was basically question and answer, allowing  
9 Mr. Watson to talk whenever he wished to volunteer information  
10 in any given areas.

11 It also involved a few things in which he had to  
12 do things with paper and pencil.

13 It also involved some tests of intellectual func-  
14 tioning.

15 Q Can you tell us what your impressions were of  
16 Mr. Watson as you conducted the interviews with him?

17 A Yes, I had two impressions that Mr. Watson at the  
18 time I examined him had some evidences of suffering from  
19 organic brain damage. This was my first impression.

20 My second impression, that he had some evidences  
21 of still being psychotic; namely, not completely in touch with  
22 reality.

23 Q Is that the time you talked with him in May of  
24 1971?

25 A Yes.

26 Q Did you have an opportunity, Dr. Bohr, during the  
27 time that you talked with him to assess his credibility; that  
28 is, did you see any or observe anything that you can attach to

21-3  
1 his integrity or his honesty or anything of that nature, as  
2 it impressed you?

3 A Initially when I began to interview Mr. Watson, I  
4 thought he was a little angry and resistant. He subsequently  
5 became very cooperative and said that he wanted to cooperate.  
6 This, of course, is his word and not necessarily proof.

7 I gathered one other factor, I think someone who  
8 has suffered organic brain damage and who has been interviewed  
9 by a number of interviewers -- and I did have access to about  
10 10 other reports -- that I felt that his story was remarkably  
11 the same, and I think that this would be a difficult feat for  
12 someone who was suffering from brain damage.

13 This, in itself, I would say, gives some evidence  
14 of credibility.

15 Q In other words, you felt the fact that he was  
16 repeating substantially the same story --

17 A Yes.

18 Q -- and you think that if he were not brain damaged  
19 that would not have been possible, or, at least, it corrobo-  
20 rates your feeling of brain damage?

21 A Well, I think a brain damaged person has difficulty  
22 memorizing and repeating the same story over and over, you  
23 know, in the same fashion.

24 Q Did you have the feeling that Mr. Watson was being  
25 honest with you?

26 A Basically, yes.

27 Q And were there times when you felt he was not  
28 being honest?

21-4

1           A       This is extremely difficult to assess. I felt  
2 basically once we got started and established rapport, I had  
3 the basic feeling Mr. Watson was being honest with me; but this  
4 is an extremely difficult thing to assess.

5           Q       Now, when you talked with him and you already read  
6 all the articles that you have indicated you had access to?

7           A       No; in fact, almost all the things that I had read  
8 I had read subsequent to interviewing Mr. Watson.

9           Q       So that your impressions and the information you  
10 gained from Mr. Watson, as far as you were concerned, were  
11 uncontaminated by reports or information you got elsewhere?

12          A       I think they were independent.

13          Q       Did Mr. Watson tell you about his experiences with  
14 LSD?

15          A       Yes, he told me about LSD and tended to lump this  
16 with the use of multiple other drugs, as well.

17          Q       What other drugs did he talk about?

18          A       He talked about amphetamines, LSD and belladonna  
19 root, if I recall correctly.

20          Q       Had you ever done any study on the drug, bella-  
21 donna?

22          A       No, I have done reading.

23          Q       Yes?

24          A       Yes, I have done reading on the drug, belladonna.

25          Q       And how about in the field of amphetamines?

26          A       Yes, I have done reading in the field of ampheta-  
27 mines.

28          Q       And also with LSD?

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A Yes, I have.

Q Now, have you talked to other people who had used LSD and other type of drugs?

A Yes, I have spoken, I am sure, to well over a thousand people who have used these drugs, yes.

Q And were Mr. Watson's comments about LSD and its effect on him consistent with the reports you had received from other people who had used LSD?

A Yes, from other heavy users, heavy chronic users.

#22

1 Q Would you consider Mr. Watson a heavy chronic  
2 user of LSD?

3 A Yes, I would.

4 Q And what does that indicate to you?

5 A A person who takes LSD several times a week, or  
6 possibly even several times a day, over a period of even  
7 months to one or two years, I would consider a heavy chronic  
8 user of LSD.

9 Q Would the chronic nature of the use be affected  
10 by the type of drug being used, that is whether it is a  
11 chemically pure drug or a street drug?

12 A This would be speculative and I must honestly say  
13 I would not know, although I believe that it would. I could  
14 give reasons for my speculation.

15 Q Would you, please?

16 A Yes.

17 LSD is made from a drug called ergot, which has  
18 been known for hundreds of years to produce psychosis and  
19 most of the LSD that is manufactured, is manufactured from  
20 ergot derivatives and in the purification, you not only have  
21 LSD, but you also have ergot derivatives if the process of  
22 purifying isn't good and ergot is a psychotic producing agent  
23 as well.

24 Q Insofar as you know is LSD being manufactured  
25 lawfully in the United States?

26 A It is not.

27 Q So that any LSD then that one uses would have to  
28 be an illegal or illicit drug; is that correct?



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A Yes.

Q And if it is an illicit or illegal drug, is there any way of telling what it contains?

A No way at all. Well, there is in a laboratory but not for the person taking it.

Q I am talking about the user of the drug.

A No.

Q Would there be any way of telling, short of a laboratory test, what the actual ingredients of the drug would be?

A No.

Q Or whether it was being mixed or contaminated or adulterated with something else?

A No.

Q In your experience is LSD being adulterated with other substances?

A The people who use it and sell it that talk to me indicate that LSD is frequently contaminated with other ingredients, usually amphetamines, cocaine, sometimes heroin, sometimes even strychnine.

Q All of which in and of themselves are dangerous drugs; is that correct?

A Could be, yes.

Q Would you consider LSD a dangerous drug?

A I do.

Q Do you have an opinion, Doctor Bohr, as to whether or not the chronic use of LSD in some manner will affect or change the personality of the user?



1 A It is my opinion that it will.

2 Q Under what conditions?

3 A Well, I think that -- I think the amount of it is one  
4 thing.

5 A person who takes these drugs that make him  
6 psychotic over a long period of time, namely, out of touch  
7 with reality, will be chronically out of touch with reality.

8 There is another reason that LSD users often  
9 talk about is what they call a guide, someone who is either  
10 more experienced or may be a guru type individual who can  
11 influence their thinking and sometimes powerfully.

12 I think another factor that is powerful with the  
13 taking of any drugs, mind altering drugs, is social isolation.

14 I think that if we are in regular contact with  
15 regular people, plus television, plus radio, I think we can  
16 always test whether our ideas are psychotic or crazy or  
17 whether they are real.

18 I think if you are separated from that, I think  
19 it is much more easy for a person to get divorced from the  
20 real world and get into some unreal world.

21 In other words, I believe that as I have seen a  
22 group of kids who take drugs and live, let's say, in a commune,  
23 will be more susceptible to very strange group ideation than  
24 will people who take LSD but still have contact with the real  
25 world around them.

26 Q Would the effect of the drug be enhanced if all  
27 the other people in the peer group were using the drug?

28 A I am not certain of the effect itself, but I think

1 the development of unreal or psychotic thoughts would be more  
2 prevalent.

3 I think that these could be shared in a kind of  
4 mass psychosis.

5 Maybe I could give a little illustration. In  
6 the middle ages what we called the St. Vitus' Dance at that  
7 time was mass psychosis induced by ergot, which is an LSD-  
8 like drug, in which the psychosis seemed to be contagious among  
9 large masses of people .

10 Q Did Mr. Watson tell you about living out at Spahn  
11 Ranch?

12 A Yes, he did.

13 Q And would you consider that a type of social  
14 isolation you talk of?

15 A Yes, I would.

16 Q Did he tell you about the influence of a person  
17 by the name of Manson?

18 A Yes, he did.

19 Q And would Manson be the leader or guru that you  
20 spoke of as having an effect on the takers of the drug?

21 A He certainly would be a leader. A guru I think is  
22 a special word, but I think certainly a powerful leader, a  
23 very influential leader.

24 Q If the philosophy of the leader is directed toward  
25 no good, if I can use that expression, as opposed to moral  
26 judgments, would that affect the user of the drug?

27 A It is my opinion from studies that have been done,  
28 particularly the brain-washing technique since the Korean War,

1 yes, that a powerful individual can influence individuals under  
2 drugs much more readily than if they are not on drugs.

3 Q Do the people under the influence of the drug  
4 become more susceptible?

5 A Yes, under the conditions of a leader and social  
6 isolation and a kind of group process where they are all doing  
7 the same thing.

8 Q Did you find that present at the Spahn Ranch as  
9 Mr. Watson outlined it to you?

10 A I think it is highly probable that those conditions  
11 were present, yes.

12 Q Would the use of LSD in the fashion described by  
13 Mr. Watson tend to change one's sense of values?

14 A Yes. The LSD, in this sense that I think it would  
15 create a greater apathy and I think much more individual  
16 thinking that was quite separate from the main stream thinking  
17 of society, yes.

18 Q Does LSD affect all people the same?

19 A It is my impression that the very heavy chronic  
20 user of LSD always seems to leave some mark on the person.

21 I think the intermittent casual user like you  
22 might see in the universities, that I see in out-patient, I  
23 see occasionally who might take LSD once a month or three  
24 times a year, the effect quite likely would be very different  
25 and leave very few, if any, marks on their personality.

26 Q What I was driving at, Dr. Bohr, is whether or not  
27 LSD will affect a particular kind of a person more than another  
28 kind of person -- conformance as opposed to nonconformance,

1 mature as opposed to immature.

2 A I would like to say this: I think that the person  
3 who uses LSD heavily in my experience always has been a  
4 significantly disturbed person before he started using the  
5 LSD and I think in that sense when he becomes a heavier user,  
6 he is even more susceptible to the effects because there is  
7 emotional instability to begin with.

23

23R-1

1 Q As you discussed -- strike that.

2 Did Mr. Watson discuss his background with you  
3 and his background as it led up to meeting Mr. Manson and the  
4 people at the Spahn Ranch?

5 A Yes, he did.

6 Q And in that discussion were you able to, in your  
7 opinion, detect any type of behavior that you thought was  
8 abnormal on his part?

9 A Not highly significant abnormal behavior. I saw  
10 him, from his description, as a rather passive individual who  
11 was quite conforming to his social structure and his mother,  
12 particularly, who I think underneath was probably somewhat  
13 angry with that conformity and who would be a person who would  
14 tend, really, to seek out strong figures and conform to them,  
15 conform to their style of life or their philosophy.

16 Q Such as Mr. Manson in Mr. Watson's case?

17 A Yes.

18 Q Did you find Mr. Watson to be a particularly  
19 mature individual?

20 A At the time I examined him I would have to say,  
21 no.

22 Q Can you give us an opinion as to the degree of  
23 maturity on his part at the time he became involved with Mr.  
24 Manson?

25 MR. BUGLIOSI: This is calling for speculation; it is  
26 also an ambiguous question, your Honor.

27 THE COURT: Can you answer that, Doctor?

28 THE WITNESS: I would have to speculate.

23-2

1 THE COURT: Sustained.

2 Q BY MR. BUBRICK: Does the prolonged use of LSD  
3 change the personality of the user?

4 A I believe that it does.

5 Q Now, what was the purpose of examining Mr. Watson  
6 when you went there, Dr. Bohr?

7 A I was requested by Judge Alexander, and I believe  
8 I have -- I was asked to render opinions on sanity, whether he  
9 was able to understand the nature and purpose; whether he was  
10 able to cooperate with counsel; whether he was able to conduct  
11 his own defense; whether he was able to form specific intent,  
12 deliberate, premeditate, harbor malice, and reflect meaningfully  
13 and maturely.

14 THE COURT: May I see that, please?

15 THE WITNESS: Yes; I believe that's yours, your Honor.

16 THE COURT: No, that is Malcolm Lucas.

17 THE WITNESS: I am sorry.

18 THE COURT: That's all right; he is a very fine person.

19 MR. BUBRICK: Also a judge of the Superior Court.

20 THE COURT: No, Federal Court.

21 MR. BUBRICK: I am sorry; at that time judge of the  
22 Superior Court.

23 Q What were the results of your examinations; what  
24 conclusions did you draw as a result of your examination of  
25 Mr. Watson?

26 A It is my opinion that during the commission of  
27 the crime Mr. Watson was so intoxicated --

28 MR. BUGLIOSI: Your Honor, may we approach the bench

23-3  
1 just briefly?

2 THE COURT: Yes.

3 (Unreported discussion between the court  
4 and counsel.)

5 Q BY MR. BUBRICK: Dr. Bohr, before I ask you to  
6 continue on with your answer, may I ask you this, please:  
7 Did you take into consideration in reaching the opinions that  
8 you did, your discussions with Mr. Watson about his use of  
9 belladonna and amphetamines, including speed?

10 A I guess I did.

11 Q And did you take into consideration in the forma-  
12 tion of your opinions the effect, if any, that the use of  
13 these drugs, either in the alternative or one after the other,  
14 at the same time, might have?

15 A Yes, I did.

16 Q And so that you were aware of the various drugs  
17 that Mr. Watson had used and the frequency and times of use  
18 at the time you formed your opinion?

19 A Yes.

20 Q Now, will you tell us again, please, if you will,  
21 what your opinions were about Mr. Watson?

22 A I believe that because of his intoxication with  
23 these various drugs, as well as his psychoses, that he was  
24 functioning in a kind of a dreamlike state in which rational,  
25 logical thinking was minimal and that he could not form in  
26 any intellectual or any level, cerebral or intellectual level  
27 -- I didn't believe he could form intent or harbor malice.

28 Q How about premeditate?



23-4

1           A       I believe, also, that premeditation would be  
2 very severely impaired in the case of drug-induced psychoses,  
3 and I think that possibly other existing psychoses.

4           Q       And you felt that at the time of your examination  
5 he was still showing some evidences of these psychoses; is that  
6 true?

7           A       Yes, I did.

8           Q       Can you label these psychoses that you thought he  
9 was under at the time you talked with him?

10          A       Yes, I think that it was my opinion that he showed  
11 too clearly discernible clinical entities. One is some evidence  
12 of residual damage to his brain, actual organic brain damage;  
13 the other was that his psychosis looked like what we would call  
14 a schizophrenic psychosis, schizoaffective.

15                   By that, I mean he was schizophrenic and it was  
16 manifested by rambling, loose thinking, as well as moderately  
17 severe depression.

18          Q       How would you describe his tonal effect as he  
19 talked with you?

20          A       He had, during almost all of the interview,  
21 virtually no expression on his face, with the exception of a  
22 kind of heaviness, an open-jaw kind of expression.

23                   He spoke in a very mechanical monotone with very  
24 frequent repetitions to what he said.

25          Q       Is that significant in psychiatric circles?

26          A       I think that that is very significant.

27                   I think that a person with this very kind of dull  
28 facies or facial expression, drooping jaw and vacant look,



23-5

1 this is a type of look that one often sees in persons with  
2 chronic brain damage.

3 Q And how about the flat effect of his conversations;  
4 is that significant?

5 A Well, again, I think that is something that is  
6 often seen in the psychosis that is called schizophrenia.

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1 Q Is that one of the classic symptoms of schizo-  
2 phrenia?

3 A That is one of the classical symptoms of schizo-  
4 phrenia.

5 Q Now, you have told us, if I can jump back to it,  
6 that you did not believe that Watson could premeditate,  
7 deliberate or harbor malice; is that correct?

8 A That's correct, in the severely intoxicated state --

9 Q Do you have an opinion as to whether Mr. Manson  
10 at the time of the commission -- I am sorry, Mr. Watson at the  
11 time of the commission of the offenses had the mental capacity  
12 to meaningfully and naturely reflect on the gravity of his  
13 contemplated acts and, if so, to what effect could he reflect?

14 A I think he would have had extremely limited ability  
15 to reflect on gravity.

16 Q What makes you say that?

17 A All of the drugs that are described are psychidelic  
18 drugs that produce a dreamlike state. A person under these  
19 drugs actually functions as if he is functioning in a dream,  
20 in a kind of automatic way in which his intellect, his feel-  
21 ings and his musculature motor functions all seem to be some-  
22 what separated -- a very dreamlike, noncerebral or non-  
23 intellectual state.

24 Q Can this person, nevertheless, perform motor  
25 functions?

26 A Oh, yes.

27 Q Would they be the kind of functions that involved  
28 gross movement as compared to refined movements?

1       A       Depending on the degree of toxicity -- I have  
2       seen maybe 200 people under LSD who were, while they were  
3       acutely under the influence, have been able to perform both  
4       gross and fine movements and really didn't look that much  
5       different from anyone else, even though when you examined them  
6       they would drift in and out of a very psychotic state.

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#24

1 Q Are you able to tell by looking at an individual  
2 whether or not he is under the influence of a drug such as  
3 LSD?

4 A I do not believe so. I have seen probably over  
5 200 and most of them look very much like anybody in this  
6 courtroom.

7 Q Let me go back for just a few more questions, if  
8 I may.

9 What is the basis of your opinion that Watson  
10 could not premeditate?

11 A Mr. Watson gave me a history, and I have to base  
12 the evidence on his history and also on the aftermath that I  
13 saw when I so examined him -- I have never seen anyone who  
14 took LSD at this level, and amphetamines at this level, and  
15 add to that belladonna, which is a very toxic drug, in which  
16 a person operated at an intellectual rational cerebral function.

17 I think that the cerebrum, the higher parts of  
18 the brain, are necessary for premeditation.

19 Q How about the deliberation?

20 A I think the higher parts of the brain are also  
21 necessary for deliberation and I think their effectiveness is  
22 blotted out by heavy hallucinogenic use.

23 Q Is that also true of the ability to harbor malice?

24 A In my opinion, yes.

25 Q Can you give us any idea, or do you have an opinion  
26 as to the cause of the illness that you found in Mr. Watson?

27 A Yes.

28 My opinion is speculative. I believe that Mr.

24-2

1 Watson had taken drugs of such quantity and over such a long  
2 period of time that these had actually caused organic damage  
3 to his brain.

4 However, I also am presupposing, and this is  
5 based on interviewing hundreds of people that have a similar  
6 experience to Mr. Watson, that he, to get this strung out,  
7 must have had a pre-existing emotional, significant emotional  
8 illness prior, or he would not have allowed himself to get  
9 this strung out on this many hallucinogens.

10 Q That is based on your interviews of other people  
11 who have a drug problem?

12 A Of a great number.

13 Q Doctor, do you have an opinion as to whether or  
14 not you would have to change your diagnosis of Mr. Watson if  
15 you found out he had not been completely candid with you in  
16 some of the details as he related them to you?

17 A That would not change my basic diagnosis, no.

18 Q Does the effect of or the combined effect of the  
19 drugs that Mr. Watson told you about carry over into his state  
20 where you may not have been using them at that particular  
21 moment?

22 A Could you repeat that, counsel.

23 Q Yes.

24 Does the effect of a combination of the drugs that  
25 Mr. Watson told you about carry over into an individual's  
26 activities, even though he may not at the moment of doing  
27 something, be under the influence of a drug?

28 A Yes.

24-3

1 I think there can be residual effects from the  
2 hallucinogenic drugs. I think someone who becomes psychotic  
3 under these -- we often see that these people remain psychotic  
4 some time after taking the drugs.

5 Q What I was talking about, what I was getting at,  
6 Dr. Bohr, is: If the kind of society that Watson described  
7 living under, while he was taking drugs, continued for some  
8 period of time, would that carry over into a time when he  
9 left the society or was not completely dominated by the group?

10 A Yes.

11 I think the studies done in brain-washing show  
12 that the person who is brain-washed, or has undergone some  
13 type of thought influencing or control, that they might have  
14 defects for a number of years afterwards and particularly  
15 emotional effects.

16 Q Does it tend to disappear or dissipate, however,  
17 with time?

18 A It tends to get better.

19 MR. BUBRICK: I have nothing further, your Honor.  
20

21 CROSS-EXAMINATION

22 BY MR. BUGLIOSI:

23 Q Doctor, could I see that letter from Judge Lucas.  
24

25 A Yes.

26 Q Judge Lucas asked you to do several things; is that  
27 correct, Doctor?

28 A That is correct.

Q And he put an X on those blocks indicating what he

1 wanted you to do; is that correct?

2 A That is correct.

3 Q And are you aware or have you been told that one  
4 of the central issues during this trial is whether Mr. Watson  
5 deliberated and premeditated these murders. Are you aware of  
6 that?

7 A I don't believe that I was aware of that until a  
8 few moments ago.

9 Q Doesn't Judge Lucas ask you in block No. 9 to  
10 answer the question "Did the defendant at the time of the  
11 completion of the alleged offense have a mental capacity to  
12 deliberate"?

13 And No. 10: "Did the defendant at the time of  
14 the commission of the alleged offense have mental capacity  
15 to premeditate"?

16 A Right.

17 Q Did that give you the impression that maybe this  
18 trial was going to be concerned with those things?

19 A I thought the trial was going to be concerned  
20 with everything that was marked and I have subsequently been  
21 told since this proceeding that it was not.

22 Q But you knew that you were supposed to advise  
23 Judge Lucas on your opinion of whether Mr. Watson had the  
24 mental capacity to deliberate and premeditate; is that  
25 correct?

26 A That is correct.

27 Q And you also knew in block No. 12 that Judge  
28 Lucas wanted you to examine Mr. Watson and then report back



1 to Judge Lucas whether you felt Mr. Watson had the mental  
2 capacity to meaningfully and materially reflect upon the  
3 gravity of his contemplated acts; is that correct?

4 A That is correct.

5 Q Now, when you prepared your report, did you answer  
6 those three questions about deliberation, premeditation, or  
7 materially and meaningfully reflect upon the gravity of the  
8 contemplated act?

9 A I did not.

10 Q Any reason for that?

11 A Yes -- no sinister one.

12 Q No.

13 A I had the unfortunate experience of having one  
14 secretary have her husband transferred to North Carolina and  
15 getting a new secretary, and during that period of time my  
16 new secretary -- well, my old secretary, first of all, had  
17 this thing placed in, when I wrote the report, in a place I  
18 did not have access.

19 My new secretary typed it up and sent it to the  
20 wrong place. So there were some things, yes, that were over-  
21 looked, simply on the basis of a change in secretaries.

22 Q Are you suggesting that this report left your  
23 office without you reading it?

24 A No. This was in --

25 Q This report right here, this report right here,

26 A No. That has not left --

27 Q Did this leave your office without your reading it?

28 A No, it did not.



24A

1 Q You did read it?

2 A I did read it, yes.

3 Q In reading your report you can see in the section  
4 marked "Diagnostic impression" that there is no reference  
5 there to deliberation, premeditation, or materially and  
6 meaningfully reflect.

7 Why didn't you catch it at that time and make the  
8 necessary corrections?

9 A Again, as I say, this occurred right when I was  
10 changing secretaries.

11 I was called to submit my report. This must have  
12 been in mid-June. I dictated the report on a dictating  
13 machine on the weekend, again while my one secretary had  
14 this in a file and this was dictated without this sheet in  
15 front of me because at that time it was in my office but in  
16 a file that it took my new secretary to find.

17 Q At the time you read the report that you have in  
18 front of you here, did you notice at that time that there was  
19 no reference to deliberation, premeditation or materially and  
20 meaningfully reflect? Did you notice it at that time?

21 A When I read it here I noticed it, yes.

22 Q When you read it here today?

23 A Yes.

24 Q I mean when you read it back in your office before  
25 it left your office. Did you notice that there was no  
26 reference in here to deliberation, premeditation and materially  
27 and meaningfully reflect?

28 A I am sorry.

1 Q At that time.

2 A I am certain that I did but again at that  
3 particular time this was still filed by an old secretary which  
4 I didn't have access to.

5 Q Does your report there, Doctor, contain everything  
6 that Mr. Watson told you?

7 A No. I think a 5-hour interview, since I don't  
8 take shorthand -- I think I took some, you know, key or  
9 salient statements. I think it is impossible. A report like  
10 this would be this thick (indicating) in a 5-hour interview.

11 Q Right.

12 A I didn't think I was able to take a tape recorder  
13 into the prison either.

14 Q So you left many things out of your report?

15 A I took the high points or the key points, yes.  
16 This is not the result of five hours of interview.

17 Q How many pages is your report?

18 A It is 8 pages.

19 Q That is a synopsis of a 5-hour interview?

20 A Yes.

21 Q Have you ever heard of the so-called Ganser  
22 syndrome?

23 A Yes, I have.

24 Q What is the Ganser syndrome?

25 A Sometimes when a person is incarcerated for a  
26 crime, he may act in a very psychotic way during the early  
27 part of his imprisonment. Many people believe it is a form  
28 of malingering.

1 Q Malingering or malingering?

2 A Malingering, malingering.

3 Q Go ahead.

4 A Other people feel it is a form of schizophrenia.

5 Q Well, this is a condition which normally arises  
6 in cases where individuals are accused of serious crimes?

7 A That is correct.

8 Q As opposed to, let's say, drunk driving?

9 A Right.

10 Q And it normally arises while the person is  
11 incarcerated or awaiting trial; is that correct?

12 A That is correct.

13 Q And the people tend, or the person incarcerated  
14 tends to develop symptoms which appear to be psychotic?

15 A That is correct.

16 25 fls.

25R-1

1 Q Sometimes they actually do develop legitimate  
2 psychoses; is that correct?

3 A Yes, many times they become very psychotic.

4 Q And this psychotic state which arises as a result  
5 of this Ganser syndrome, this arises after the commission of  
6 the crime?

7 A The psychosis, itself, appears, yes, after the  
8 incarceration.

9 Q Did you take into consideration the possibility  
10 that Mr. Watson's mental condition at the time you examined  
11 him may have been a result of the so-called Ganser syndrome;  
12 is that a possibility?

13 A Yes, I did.

14 Q Did you come to any conclusion --

15 A I did not think it was a Ganser syndrome.

16 Q Why not?

17 A The person with a Ganser syndrom usually is  
18 extremely bizarre in overexaggerating his symptoms. I didn't  
19 see that in Mr. Watson.

20 The Ganser syndrom deliberately distorts and  
21 exaggerates and almost makes a caricature of the psychosis.  
22 I didn't see this in Mr. Watson.

23 Q Didn't you indicate that sometimes as a result of  
24 this Ganser syndrom a person actually develops a legitimate  
25 psychosis; didn't you indicate that?

26 A I said that he becomes psychotic. It is my  
27 personal opinion in regard to the Ganser syndrome that a  
28 person has a prepsychotic state that in prison this becomes

25-2  
1 more florid and under the threat of punishment.

2 Q Sometimes these psychotic syndromes are artificial  
3 and sometimes they are actually valid and legitimate; is that  
4 correct?

5 A I think that's correct, yes.

6 Q So couldn't this have been the case of Mr. Watson?

7 A I do not believe so.

8 Q At the time you interviewed Mr. Watson did he know  
9 where he was?

10 A He knew where he was.

11 Q And did he know who you were?

12 A Yes.

13 Q Did he know the day, month and year?

14 A He was oriented as to time, place and the person,  
15 yes.

16 Q What about recent events, his memory for recent  
17 events; how was that?

18 A I thought there was a kind of spottiness in a  
19 number of aspects of recent memory.

20 Q What about remote events; how was his memory for  
21 that?

22 A I thought his memory for remote events was quite  
23 good.

24 Q Incidentally, Doctor, you are getting paid to  
25 testify; is that correct?

26 A Yes.

27 MR. BUBRICK: Your Honor, that is immaterial. He is  
28 a court witness.

25-3

1 THE COURT: The Court will pay him.

2 Q BY MR. BUGLIOSI: Doctor, would you agree that to  
3 know what is going in a man's mind it is imperative, among  
4 other things, to examine his statements and his conduct and  
5 from his statements and from his conduct draw inferences as  
6 to what is on his mind at the time he engages in a particular  
7 activity?

8 Would you agree with that?

9 A Yes.

10 Q Now, since we are concerned in the trial with  
11 Mr. Watson's state of mind at the time he committed these  
12 killings, will you agree that it is extremely difficult to  
13 render a valid opinion about Mr. Watson's state of mind at  
14 the time of these killings without becoming thoroughly familiar  
15 with his conduct and his statements at the time of the killings?

16 Would you agree with that?

17 THE WITNESS: Your Honor, is this -- does this pertain  
18 to what we were discussing before? I'm not certain as to  
19 what --

20 THE COURT: Well, I am not, either.

21 MR. BUGLIOSI: Maybe we could approach the bench with  
22 the doctor?

23 THE COURT: Yes; Doctor, suppose you come around.

24 We better have the reporter.

25 (The following proceedings were had at the  
26 bench, out of the hearing of the jury:)

27 THE COURT: Doctor, you understood his question?

28 THE WITNESS: I think I did, and I think it was

25-4  
1 reflecting the state of his sanity at the time of the commis-  
2 sion of the offense --

3 MR. BUGLIOSI: No, we are talking now about deliberation,  
4 premeditation and maturely and meaningfully reflecting. We  
5 cannot talk about that.

6 THE WITNESS: I misunderstood you, then.

7 MR. BUGLIOSI: I want you to give an opinion as to  
8 whether you feel that it would be necessary to know his con-  
9 duct and his statements at the time of the crime, to form an  
10 opinion as to whether he could deliberate, premeditate, and  
11 maturely reflect upon the gravity of his acts; that is what --

12 THE COURT: Do you understand it now?

13 THE WITNESS: I am clear; yes, thank you.

14 (The following proceedings were had in open  
15 court, within the presence of the jury:)

16 Q BY MR. BUGLIOSI: Just going back a little bit,  
17 Doctor, you indicated that to understand what is on a person's  
18 mind or what was on a person's mind at the time he engaged in  
19 a particular act, you'd have to look at his conduct and his  
20 statements and then draw inferences as to what was on his mind;  
21 is that correct?

22 A Yes, I think there are some other things you'd  
23 want to know, but basically, yes.

24 Q But conduct and statements are extremely important,  
25 you will agree with that?

26 A Yes, they are important, in the light of other  
27 things, also.

28 Q Now, would you agree, then, that to determine what

25-5

1 Mr. Watson's state of mind was at the time he committed these  
2 killings, in order for you to form a valid opinion as to what  
3 his state of mind was, it would be almost impossible to do this  
4 without becoming familiar with his acts and his conduct and  
5 his statements on these two nights of murder?

6 A It would be helpful if we knew everything about  
7 his acts and conduct by someone who <sup>was</sup> were an objective reporter,  
8 yes.

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1 Q In fact, if you didn't know anything about what  
2 he did on these two nights of murder, it would be almost  
3 impossible for you to form a valid opinion, if you knew  
4 absolutely nothing of what he did?

5 MR. BUBRICK: Your Honor, I think that assumes facts  
6 not in evidence, because it is obvious he knew what Mr. Watson  
7 said he did.

8 MR. BUGLIOSI: I am speaking, now -- this is a foundation-  
9 al question.

10 THE COURT: Well, it is more than a foundation. Doctor,  
11 if you don't know what he did on the nights of August 8th and  
12 9th, I believe, 1969, could you form any opinion as to his  
13 mental condition?

14 THE WITNESS: Yes, I think that a person -- I think that  
15 I could form a reasonably good opinion of his mental condition,  
16 quite devoid of what his conduct was, based upon his heavy  
17 drug ingestion plus an existing psychosis.

18 Q BY MR. BUGLIOSI: So, in other words, even if you  
19 had never spoken to Charles Watson -- let me withdraw that.

20 Even if Charles Watson had never told you anything  
21 about what he did on these two nights of murder and you had no  
22 information whatsoever about his conduct, you could still take  
23 that witness stand and form an opinion of whether he deliberated  
24 and premeditated these murders?

25 A I think with the information of very heavy drug  
26 usage and psychosis, I think I could render an opinion about  
27 limited capacity in almost all of the cerebral intellectual  
28 areas.

25-2

1 Q Then is it your opinion, then -- correct me if I  
2 am wrong -- is it your opinion, then, that a person who ingests  
3 drugs on a rather continual basis, is a chronic user of LSD  
4 and other dangerous drugs, is it your opinion that that person  
5 is not capable, cannot premeditate and deliberate; is that your  
6 opinion?

7 A No.

8 Q What is your opinion?

9 A My opinion is that if there is an individual who  
10 basically is suffering from a psychosis, in addition to that  
11 he is aggravating his psychosis by heavy ingestion of at least  
12 three types of hallucinogens, that I think that there would  
13 be a high level of probability that this individual would be  
14 operating on a very low cerebral intellectual level, which I  
15 think would be necessary for deliberation and premeditation  
16 and harboring malice.

17 Q So, psychosis plus LSD would prevent a person  
18 from deliberating and premeditating?

19 A No, I think that is too simple; psychosis plus  
20 chronic heavy use of hallucinogens, LSD being one of them --

21 Q There are many, many types of psychoses; right?

22 A Yes, there are.

23 Q What type of psychosis, plus chronic use of LSD,  
24 would prevent someone from deliberating and premeditating a  
25 murder?

26 A I think a paranoid schizophrenia.

27 Q Could you give us in more layman's language what  
28 you mean by paranoid schizophrenia?

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A Yes, I think I first would have to define what I mean by schizophrenia.

#26

1 Q All right.

2 A Schizophrenia, the word itself means a splitting  
3 of the mind.

4 Its characteristics are several things: A person  
5 has disturbances in his emotions, or what we call affect.

6 Either he has no emotions, he is a dead pan, or  
7 he might be very inappropriate in his emotions.

8 He might laugh in the face of death. He might  
9 cry when something funny is happening. That is a characteristic  
10 -- a severe distortion of emotion.

11 The second thing is a kind of a severe disturbance  
12 in the thinking process, so that thought is really quite  
13 garbled and what they say doesn't make logic and doesn't make  
14 sense.

15 Now, the third very important point is a private  
16 system of thinking, that someone thinks privately.

17 If I think I am Jesus Christ or Napoleon or God,  
18 or if I think I have had visions from heaven, et cetera,  
19 et cetera, or maybe any other very unique private system of  
20 thinking, that is ver divorced from reality -- when one has  
21 these situations, one would say that we have an entity called  
22 schizophrenia and I think a common word for that, at least in  
23 a severe form, is crazy.

24 Now, when I say paranoid schizophrenia, I mean a  
25 person who either has one or two basic ideas.

26 Either that he is being persecuted or the other  
27 is a grandiose delusion that he is God or has special powers  
28 or is able to do special acts and I think that this describes

26-2

1 what I mean by paranoid schizophrenia.

2 Q Is that the type that Mr. Watson had?

3 A I think he has a mixed kind of schizophrenia.

4 I think the important thing to recognize about  
5 schizophrenia -- there are numerous types, but people can  
6 shift from type to type as you see them in subsequent psychotic  
7 episodes.

8 You may see someone who is paranoid. You may see  
9 that same person, let's say, a year and a half later, that  
10 might be schizophrenic mostly in terms of depression.

11 You may see that same person two years later that  
12 may have a multiple different kinds of schizophrenia, all  
13 existing at once. They call this an undifferentiated  
14 schizophrenia. This is very common.

15 Q So it is your opinion if someone is suffering  
16 from paranoid schizophrenia and he is a chronic user of LSD,  
17 the chances are he could not deliberate and premeditate a  
18 murder; is that correct?

19 A I think his ability to deliberate and premeditate  
20 and materially reflect would be severely impaired.

21 Q Didn't you say a while ago that it would be very  
22 helpful for you to find out what a person did during the  
23 commission of a crime to form an opinion as to his mental  
24 condition?

25 A I think that -- yes, I think that an expert witness,  
26 the more information one has, certainly the better opinion one  
27 can form but I think I can form an opinion regarding the  
28 person's mental state from examination.

26-3

1 Q You realize that deliberation and premeditation  
2 are legal concepts. You are aware of that?

3 A I am aware of that.

4 Q That they are not medical or psychiatric concepts?

5 A I am aware of that.

6 Q Now, you say it would be helpful to learn from,  
7 let's say, an unbiased source as to what this person did during  
8 the commission of the crime; is that correct?

9 A Yes.

10 Q But you still feel that even though it would be  
11 helpful, it would not be necessary?

12 A No, I don't say it wouldn't be necessary, but I  
13 think it would be helpful, but I think that you still could  
14 form some opinion, though, as to the impairment of these  
15 abilities from how psychotic an individual was.

16 Q Even without knowing what this individual did?

17 A Yes. I think having seen again several thousand  
18 people with the entity called schizophrenia, in a severe  
19 schizophrenic state, and particularly one that is aggravated  
20 by drug induced states, their behavior is very markedly  
21 modified on their ability to use their intellect and their  
22 cerebrum in conducting their life and planning it.

23 Q Let me state it a little more strongly then; If  
24 a person is paranoid schizophrenic, plus a chronic user of  
25 LSD, it wouldn't make any difference to you what he did during  
26 the commission of a crime so far as your opinion is concerned?

27 A No, sir, that is not true.

28 Q It does make a difference?

1 Q All right.

2 What difference does it make?

3 A I think in attempting to assess -- I would assume  
4 under these conditions, having seen several thousand people  
5 that would fit this category, I have never seen one who didn't  
6 have a severely impaired capacity in judgment. I think what  
7 they did and how they did it I think would give me some  
8 impression as to the magnitude of impairment.

9 Q Now, to find out how they did it, it would  
10 certainly be advisable and preferable to go to an unbiased  
11 source?

12 A Yes.

13 Q You didn't consider Mr. Watson to be an unbiased  
14 source, did you?

15 A I do not.

16 Q All right.

17 Did you go to any unbiased source to ascertain what  
18 he did and said on these two nights of murder?

19 MR. KEITH: I object. That assumes there is an  
20 unbiased source.

21 Q BY MR. BUGLIOSI: Did you attempt to go to any  
22 unbiased source?

23 A My answer I think would be the same as Mr. Keith's.  
24 I am really uncertain that there is an unbiased source.

25 Q Is your state of mind that it is just not worth  
26 looking for it?

27 A No, it is not.

28 Q Did you find -- did you make any effort to find



1 out whether or not anybody else said anything about Mr. Watson's  
2 conduct on these two nights of murder?

3 A I am aware that there is a large transcript from  
4 a previous trial involving other individuals. I was not  
5 aware of whether the transcript of that was available since  
6 this is a separate trial.

7 Q Are you aware that Linda Kasabian testified  
8 during this trial, not just during the last trial, but during  
9 this trial?

10 Were you aware of that?

11 A I have not seen any transcripts from this trial.

12 Q Are you aware that she testified during this  
13 trial?

14 A I am not aware.

15 Q But you are aware that she testified during the  
16 last trial?

17 A I read it in the newspapers, yes.

18 Q Did you ask Mr. Keith or Mr. Bubrick for her  
19 testimony?

20 A I did not.

21 Q Why not?

22 A The first trial I really was not certain that the  
23 transcript had bearing and on this trial I was under the  
24 impression that all witnesses were being excluded from  
25 previous testimony.

26 Yes, they made me get out of court prior to my  
27 testimony because they wanted no witnesses to be biased.

28 Q Doctor, you have been around the criminal courts



1 for quite a while?

2 A Yes, I have.

3 Q You have examined many, many people charged with  
4 crime?

5 A Yes, I have.

6 Q And are you telling this judge and this jury that  
7 you didn't know that it was permissible for you to read what  
8 someone said at a prior trial? Is that what you are saying?

9 A I think that is what I am saying, yes.

10 Q Who gave you this idea, Doctor?

11 A I'm really not certain where it did come from.

12 Q Did you read Susan Atkins' testimony at the  
13 Grand Jury?

14 A No, I did not.

15 Q So your opinion then on what Mr. Watson did and  
16 said on these two nights of murder came solely and exclusively  
17 from Mr. Watson?

18 A It came from Mr. Watson, yes.

19 Q And you have already said that you do not consider  
20 him to be an unbiased source; is that correct?

21 A He is not an unbiased source, no.

22 Q Did you believe everything that Mr. Watson told  
23 you?

24 A No.

25 Q Is there anything you did not believe?

26 A I think in examining someone who is charged with  
27 a very serious crime, I think that the examiner tries to take  
28 everything into account to see whether there are discrepancies

1 and what doesn't seem to make sense and I think he is on  
2 guard and tries to -- I think he does make the assumption  
3 that maybe everything he hears will not be total truth.  
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27-R-1

1 Q Well, tell the judge and the jury what Mr. Watson  
2 told you that you did not believe; or did you believe every-  
3 thing he told you?

4 A I'm not able to pick out any single thing that I  
5 can say, "This I did not believe."

6 I compared what he gave to me about his background  
7 with what he has talked about to other individuals. This  
8 seemed to be uniform.

9 I compared the description of the events of the,  
10 at least, Tate-La Bianca crime with that that he had told other  
11 examiners. This seemed to all have a degree of uniformity.

12 I felt that this was all quite significant for an  
13 individual with brain damage, that I believe has brain damage.

14 Q Well, basically, wouldn't you say you believed  
15 everything he told you?

16 A I think I have a healthy skepticism in viewing  
17 this, but because there is such a consistency of the story,  
18 I think that Mr. Watson was trying to be reasonably accurate.

19 Q Well, he told you he was under the influence of  
20 drugs on both nights; is that correct?

21 A Mr. Watson, despite two interviews, <sup>never</sup> did discuss  
22 the events of the second night. He broke down --

23 Q You tried to get him to discuss the La Bianca  
24 murders?

25 A He broke down into tears at the point that we  
26 got there; then at that point he began to become psychotic  
27 and complained about many things, about how badly he was  
28 treated, his physical ailments -- we tried to go back to that

27-2

1 and all we got was tears and sort of disorganized thinking of  
2 schizophrenia, which I was describing to the jury before.

3 Q So he never did tell you about the La Bianca mur-  
4 ders?

5 A He did not.

6 Q Do you know what happened on the night of the  
7 La Bianca murders, or do you have any information as to what  
8 happened?

9 A Only from what I have had in newspapers.

10 Q Didn't you read the other psychiatric reports in  
11 this case?

12 A And the other psychiatric reports; yes, I did.

13 Q Is there any information in there about what  
14 happened on the night of the La Bianca murders?

15 A Yes, there is.

16 Q And what do those reports say about what Tex  
17 Watson did on the night of the La Bianca murders?

18 A Since he didn't discuss this with me personally, I  
19 did read this, but I am wondering how appropriate it is for me  
20 to discuss -- your Honor, how appropriate is it for me to dis-  
21 cuss the opinions of other individuals when the witness never  
22 discussed that facet?

23 THE COURT: Did you base your opinion on anything that  
24 he said?

25 THE WITNESS: Not in regards to the Tate-La -- not in  
26 regard to the La Bianca murders, no, I didn't base my opinion  
27 on that.

28 Q BY MR. BUGLIOSI: You don't know for sure, of

1 course, whether Tex Watson was under the influence of any drugs  
2 on the nights of these murders, do you?

3 A I do not know for certainty, no.

4 Q He told you he was; right?

5 A That's correct.

6 Q And that's the beginning and the end of your source  
7 of knowledge; right?

8 A Told me about -- he told me enough about taking  
9 drugs in the drug culture that I knew he had some awareness of  
10 this type of experience over a period of time. Whether he  
11 took it on that specific night, I have to take his word, that's  
12 all I have.

13 Q You say that people under the influence of LSD  
14 are in a dreamlike state; is that correct?

15 A With heavy doses of LSD and chronic, I believe  
16 this is correct, yes.

17 Q Okay. Now, how can you tell that they are in a  
18 dreamlike state?

19 A By the way they describe their experience.

20 Q What do they normally do while they are in a dream-  
21 like state?

22 A That is a strange thing about LSD, the many people  
23 I have seen who have been under the influence look really  
24 quite normal; but, as they describe things like feeling their  
25 body leave their body, or looking brutish or ugly or their  
26 body glowing gold or seeing three of themselves, or standing  
27 from afar and seeing themselves exist, distance -- many, many  
28 strange things -- or maybe their legs being separate from their

1 body, this is the kind of thing that one realizes in dreams,  
2 although the people I have seen under it look quite normal.

3 Q Are you saying, then, that a person can actually  
4 be thinking when he is talking to you, that is his mind has  
5 left his body, that he is looking at himself from a distance  
6 and he sees three of himself, and that his legs are separate  
7 and apart from his body, but when you look at him he looks  
8 just like I am talking to you; is that --

9 MR. KEITH: Object to the question; that is not what he  
10 said.

11 THE COURT: Is that what you said, Doctor?

12 THE WITNESS: No, I'm saying that, in fact, all the  
13 people I have seen in an acute LSD psychosis look quite normal;  
14 some might have a great deal of anxiety, indeed.

15 Q BY MR. BUGLIOSI: When you say "looks normal,"  
16 what do you mean by that?

17 A Like you.

18 Q In other words, two eyes, a nose, things like that?

19 A And can speak and there is nothing that -- as far  
20 as screaming, raving, crawling walls, as you might see in an  
21 acute mental ward, usually you don't see that too often in  
22 LSD.

23 You might see it once in a while, but not too often.

24 Q Even though they feel their mind has left their  
25 body and see three of themselves, legs separate from their  
26 body, they give absolutely no manifestation to somebody else?

27 A No, I think if you talk to them enough over a  
28 period of time, I think you can sense the disorganized thinking;

1 but as far as their appearance, and in, certainly greeting you,  
2 responding initially, they don't look that different.

3 Q But if you are with them for a period of time, you  
4 can tell that they are under the influence of something?

5 A Yes, usually, yes.

6 THE COURT: Excuse me, Mr. Bugliosi.

7 We will have our afternoon recess at this time.

8 MR. BUGLIOSI: Thank you, your Honor.

9 THE COURT: Ladies and gentlemen, we will have our after-  
10 noon recess at this time. Please heed the usual admonition.

11 (Recess.)  
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#28

1 THE COURT: People against Watson.

2 Let the record show all jurors, counsel and the  
3 defendant are present.

4 You may proceed, Mr. Bugliosi.

5 Q BY MR. BUGLIOSI: Doctor, I take it it is your  
6 opinion that drugs and Manson certainly contributed toward  
7 Mr. Watson's committing these killings; is that correct?

8 A Yes.

9 Q In your opinion are there any factors in  
10 addition to drugs and Charles Manson, totally independent of  
11 drugs and Manson, that may have contributed to Mr. Watson's  
12 committing these killings?

13 A As I said previously it is my opinion that of  
14 the many people that I have seen that have taken drugs  
15 excessively, that all of these have been disturbed individuals  
16 prior to getting really heavily strung out on drugs and  
17 having the entity called schizophrenia. ~~I also believe that.~~

18 Q Before you go any further, let's talk about that  
19 one little point. You do believe then that even before Mr.  
20 Watson met Mr. Manson there is a distinct possibility that he  
21 was a very significantly disturbed individual?

22 A Yes. This is speculative <sup>substantive</sup> based on a large number  
23 of people I have seen.  
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#29



#29

1 Q And when you say significantly disturbed, you  
2 were talking about mentally and emotionally?

3 A Right.

4 Q Okay; you may go on.

5 A Yes. You asked me whether I felt there were  
6 other --

7 Q Factors.

8 A -- factors.

9 Yes, I believe that a person who takes drugs  
10 while remaining in a normal social environment is much less  
11 susceptible than if he gets in a group and, particularly,  
12 under a leader.

13 There is a psychosis which is a kind of paranoid  
14 schizophrenia, called folie-a-deux, in which two people have  
15 the same psychosis or a group of people have the same psychosis;  
16 and this, I think, can only occur under circumstances of  
17 social isolation, and I think the drugs would help.

18 *Dr. Baker would not say he felt Watson was schizophrenic. I then asked him if*  
19 Q *Dr.* You feel that this schizophrenia not only predated  
20 Charles Manson but also predated his ingestion of drugs?

21 A Yes, there is a type of schizophrenia called  
22 latent, which means that it is there but has not surfaced;  
23 but when you take drugs and it lowers the defenses, it may  
24 emerge.

25 Q O ALL right.

26 Q. In addition to the schizophrenia are you aware,  
27 then, of any other schizophrenia and also being significantly  
28 disturbed -- are you aware of any other factors that may  
have contributed to Charles Watson committing these murders?

29-2

1 A He is a passive -- he was a passive person and  
2 a follower. I think that this might be one thing. People of  
3 this makeup sometimes harbor a lot of anger inside of  
4 themselves.

5 Q Do you feel, were there any indications to you  
6 that Mr. Watson was that type of individual that had any type  
7 of a suppressed fury or rage within him?

8 A I know he was passive and I know that he was  
9 obedient to his mother, but once he broke away he sharply  
10 broke away from her in form of life and didn't even write to  
11 her. I think that this might indicate that he had at least  
12 anger toward his mother, but whether it was rage, this, I don't  
13 know.

14 Q And you feel that this anger towards his mother,  
15 this suppressed hostility may have been a factor contributing  
16 towards his committing these murders?

17 MR. RUBRICK: That's what he said all along, your Honor.

18 THE COURT: Is that what you said, Doctor?

19 THE WITNESS: I said that I thought that his type of

20 background, A, he did have anger directed toward his mother,  
21 and this anger would be within him and would emerge one way  
22 or another, probably.

23 Q BY MR. BUGLIOSI: When you say one way or the  
24 other, one of the ways could be a homicide; is that correct?

25 A Yes.

26 Q I believe you concluded that Mr. Watson could not  
27 deliberate and premeditate these murders; is that correct?

28 A Yes, I think my statement was that I thought he had

29-3

1 extremely limited capacity to deliberate and premeditate.

2 Q What do you mean by the words deliberate and  
3 premeditate?

4 Take the word "deliberate" first.

5 A Yes, deliberate would be to take into account  
6 the actions and its magnitude, and include the early planning  
7 phase.

8 Q So if someone made plans to commit the murder,  
9 this would be an indication of deliberation; is that correct?

10 A It probably would be an indication, yes.

11 Q All right.

12 Let's talk about some of these plans.

13 I am going to ask you a hypothetical question:  
14 Assuming, Doctor, assuming that en route to the Tate residence  
15 on the night of the Tate murders, Mr. Watson told the three  
16 girls in the car, "I am familiar with the residence, I know  
17 the layout; do everything that I tell you to do."

18 Would this be an indication of deliberation?

19 A It could well be.

20 Q This would indicate planning; is that correct.

21 A If this was said, it would include planning.

22 Q Did Mr. Watson tell you that en route to the  
23 Tate residence he told the three girls what I just mentioned  
24 right now in the hypothetical?

25 A He gave me quite a different account.

26 Q All right.

27 Did you take his account to be true?

28 A I think, with reservations.

Q Assuming that en route to the Tate residence there were three knives in the car and a revolver and let's assume that Mr. Watson told Linda Kasabian to wrap the knives and the revolver up and that if they were stopped by the police to throw the knives and the revolver out of the window.

Would this indicate planning and deliberation?

A Yes, I think it would indicate some level of deliberation.

#30

1 Q Did Mr. Watson tell you that he did that?

2 A He did not.

3 His account was very different.

4 Q Assuming that once the killers arrived at the  
5 Tate residence Mr. Watson climbed a telephone pole and cut  
6 the telephone wires.

7 Would this indicate deliberation on your part --  
8 the telephone wires leading to the Tate residence?

9 A It may or may not because I think I have to take  
10 into account something Mr. Watson told me that in this psychosis  
11 called folie -a-deux, where two people have kind of mutual  
12 thing going together, which I think Charles Manson and Charles  
13 Watson did, Mr. Watson said that Mr. Manson gave him  
14 instructions to do this and I think that this would be  
15 followed out as part of the kind of craziness called folie-a-  
16 deux in the programming he had received.

17 Q Assuming that Mr. Manson did not tell Mr. Watson  
18 to do this, but that this was his idea, would this show  
19 deliberation on his part? Cutting the telephone wires?

20 A I think it would show evidence of some deliberation.

21 Q Before we go any further, let's define premeditation.  
22 Maybe we can combine these two. How would you define pre-  
23 meditation?

24 A Yes. A person develops an idea in his mind and  
25 he allows it to grow until it has structured form that he can  
26 carry it out.

27 Q In other words, premeditation in your mind means  
28 that the intent to kill is not spontaneous. It is not a spur

1 of the moment thing?

2 A That is correct.

3 Q Intent to kill lives in the mind of the person  
4 for a period of time?

5 A Yes.

6 Q But you realize it could be as short as a minute.  
7 You are aware of that?

8 A I'm aware of that, yes.

9 Q All right.

10 Assuming that -- well, we won't even assume this --  
11 did Mr. Watson tell you that on the night of the Tate murders  
12 he went to the Tate residence to kill the occupants?

13 A Yes.

14 Q Would this not show a premeditated intent to kill?

15 A I would like to retract my former statement and  
16 elaborate on it.

17 Mr. Watson told me that on that day he had had  
18 belladonna, as he had had several days before, and that he  
19 really was very intoxicated, and that prior to leaving for  
20 the Tate residence he was instructed by Charles Manson to  
21 just do what the girls told him to do and on the trip over he  
22 experiences a blurred memory where he was in kind of a, you  
23 know, belladonna-LSD-amphetamine toxicity.

24 Q All right, but my question is: Did he tell you  
25 at all that he went to the residence to kill these people? Did  
26 he tell you that?

27 A Yes. He said -- not specifically. He said that  
28 Charles Manson told him just to do whatever the girls told him,

1 but I think that he was aware that they were going to the Tate  
2 residence.

3 Q All right. Then it is your testimony then that  
4 you do not believe that Charles Watson told you that Manson  
5 told him to go there and kill. Is that your testimony?

6 A Yes. My testimony is that he was told by Charles  
7 Manson to just go along with the girls, that the girls would  
8 tell him, not to worry if he didn't remember, that the girls  
9 would tell him what <sup>to</sup> do.

10 Q And do you not recall Mr. Watson telling you that  
11 Mr. Manson told him to go there and kill?

12 A No, I don't believe that -- I do not believe  
13 that this is what he told me.

14 Q Do you have the other psychiatric reports with you,  
15 Doctor?

16 A Yes, a great number of them.

17 Q Could I see a few of them?

18 A Yes.

19 Q Take a look at Dr. Frank, page 3 of Dr. Frank's  
20 report.

21 MR. BUBRICK: Just a minute, please.

22 I think Dr. Bohr has already told us he did not  
23 take those into consideration in forming his opinion.

24 MR. BUGLIOSI: Well, I think he testified that he read  
25 these reports and he also said that he found a uniformity  
26 between what Mr. Watson told him and what Mr. Watson told the  
27 other psychiatrists and based on that he has assessed Mr.  
28 Watson's credibility. So I think it is very important.



1 THE COURT: This Dr. Frank has already testified, has  
2 he not?

3 MR. BUGLIOSI: Yes. I want to bring out a point here  
4 with respect to Mr. Watson's credibility. He has already said  
5 that he believed that everything that Watson told him was  
6 correct because of the uniformity and I would like to point  
7 out, if I might, some discrepancies by way of impeachment of  
8 this witnesses testimony, your Honor. He has already given  
9 an opinion on credibility.

10 THE COURT: There is nothing pending. Just a moment,  
11 the doctor is reading what Mr. Watson told him, I believe.

12 THE WITNESS: No, I'm in error. Mr. Watson said,  
13 indicated that Manson gave details of what he wanted to do  
14 and handed him a gun and knife and said, "Go with the girls.  
15 Don't worry if you don't remember what I told you. The girls  
16 will make sure everything else is done. Just kill everybody."

17 Q BY MR. BUGLIOSI: All right, Doctor, does not this  
18 show a premeditated intent to kill under your definition of  
19 premeditation, which I think is a correct one?

20 MR. KEITH: I will object to that as not the correct one.

21 THE COURT: Sustained. Let's not have any comments,  
22 Mr. Bugliosi, please.



31R-1

1 THE WITNESS: I would like to prefix my statement by  
2 saying that in a psychosis such as folie a deux, one person  
3 can act as a robot, a puppet acting on the strings of another,  
4 and can unthinkingly and wholeheartedly accept the ideas of  
5 the other person without question, and in this sense I really  
6 am not certain whether this is a premeditation on the part of  
7 Charles Watson or he acting in an extremely automatic, pro-  
8 grammed way, as programmed by Charles Manson.

9 Q BY MR. BUGLIOSI: Well, assuming that Mr. Watson  
10 was acting in a puppet-like state, making that assumption, and  
11 that he would do whatever Manson told him to do, the fact that  
12 he would do whatever Manson told him to do would not prevent  
13 him from intending to do that; is that correct?

14 In other words, let me give you this example --

15 A Right.

16 Q -- Manson tells Watson to eat a piece of blueberry  
17 pie; Watson goes ahead and does it. It is not inconceivable  
18 that he intends to eat that blueberry pie when he eats it, is  
19 it?

20 A No, but if he were told that if he did not eat  
21 that piece of blueberry pie that when the day of judgment came  
22 that he would experience incredible fear and die of that fear,  
23 and he really, truly believed this, he would then be operating  
24 under certain delusions inculcated by his master.

25 Now, this sounds far out unless you have seen --

26 Q No.

27 A -- instances of folie a deux.

28 Q But he still intends to eat the pie; right?

1           A       He feels he is coerced to eat the pie.

2           Q       Well, we don't know whether there was coercion  
3 involved here or not, Doctor.

4                   My question is, he still intends to eat the pie?

5           A       He would eat the pie, yes.

6           Q       Are you saying he would not intend to eat it?

7           A       He might not wish to. I guess in the very act of  
8 eating, there would have to be intention.

9           Q       So the fact that -- and assuming it is a fact that  
10 he was acting like a puppet on the night of the Tate murders  
11 and that Manson told him to go out and kill, this would not  
12 prevent him from also having the intent to kill, would it?

13          A       He would take the intent of his master and it would  
14 become his own; but in a psychotic way, in which I would ques-  
15 tion whether it is his own intent -- yes, he would have intent,  
16 but I would question in this kind of psychosis whether it was  
17 his intent.

18          Q       All you are questioning, Doctor, is the origin of  
19 the intent, isn't that correct; you are not questioning the  
20 existence of the intent in his mind, you are questioning where  
21 he got it?

22          A       The origin and whether it was his.

23          Q       Let's go a little further, let's assume, Doctor,  
24 that once Mr. Watson and the three girls climbed over the  
25 fence at the Tate residence, a car approached and Mr. Watson  
26 told the three girls to get back into the bushes, or words  
27 to that effect.

28                   Would this be an indication of deliberation and

1 premeditation?

2 A Yes, I think that it would evidence some delibera-  
3 tion and some premeditation.

4 Q Let's assume that as the four advanced toward the  
5 Tate residence, let's assume hypothetically that Mr. Watson  
6 told Linda Kasabian to go to the rear of the house and check  
7 and see if there were any open doors and windows.

8 What would this show; would this show deliberation  
9 and premeditation?

10 A Yes, it could.

11 Q Mr. Watson did not tell you that, though, did he?

12 A No, he did not; his account was quite different.

13 Q He never told you that he told the girls to get  
14 back in the bushes, either, when the car approached?

15 A No, he did not.

16 Q Let's assume that Mr. Watson then cut a screen on  
17 one of the front windows at the Tate residence.

18 Would this show deliberation and premeditation on  
19 his part?

20 A Yes, if he cut the screen, I think it might show  
21 deliberation.

22 Q He didn't tell you that he cut the screen, did  
23 he?

24 A No, his account is very different.

25 Q And you have already admitted that you do not  
26 feel he is an unbiased source?

27 A No, I don't think he is an unbiased source.

28 Q Let's assume hypothetically, Doctor, that after

1 these murders when Mr. Watson and the three girls got back to  
2 the car, Mr. Watson, when he learned that Susan Atkins had  
3 left her knife inside the Tate residence, let's assume that he  
4 got angry with Susan Atkins for losing her knife.

5 What would this show?

6 A I think it would show some awareness, if this were  
7 the case.

8 Q Awareness of what?

9 A Awareness that knives shouldn't be left at the  
10 scene of a crime.

11 Q Because someone might find the knife and connect  
12 him, Mr. Watson, with the killings; right?

13 A Or connect the girls and, indirectly, him with the  
14 killings.

15 Q Let's assume, Doctor, that after they drove off  
16 and Mr. Watson suggested, or said that they had to find a  
17 place where they could all wash the blood off their bodies,  
18 and that they proceeded to actually do that, they found a place  
19 and started to hose the blood off their bodies before driving  
20 back to Spahn Ranch.

21 What would this show?

22 A This would show awareness that blood shouldn't be  
23 on one's body.

24 Q For what reason, Doctor?

25 A Apprehension, I presume.

26 Q Apprehension by the police?

27 A Yes.

28 Q Because he was aware that he had done something

1 wrong; is that correct?

2 A Yes, in the hypothetical situation, if this did  
3 happen, it would show this awareness.

4 Again, I must say this is very different from the  
5 story that Mr. Watson told me.

6 Q He didn't tell you that?

7 A He did not.

8 Q Let's assume that, hypothetically, again, that  
9 after the hosing incident, Mr. Watson drove up Benedict Canyon  
10 Drive and told Linda Kasabian to wipe the fingerprints off  
11 two knives that were left in the car and throw those knives  
12 out of the car.

13 What would that show?

14 A This would show some awareness that he shouldn't  
15 have knives on him.

16 Q Again, because of fear of apprehension?

17 A Apprehension.

18 Q By the police?

19 A Mm-hmm.

20 Q Mr. Watson didn't tell you that he told Linda that,  
21 did he?

22 A No, again, Mr. Watson's account is very different  
23 than that one.

24 Q Let's assume that Mr. Watson told Linda Kasabian  
25 to throw the clothing, the bloody clothing that was used at  
26 the time of the killings, let's assume he told her to throw  
27 the clothing out the window.

28 What would that show?

1           A       Again, I think it would show some awareness that  
2 bloody clothing might be a clue.

3           Q       Now, there are several other things, Doctor, but  
4 I think you have the gist of where I am driving.

5                   If Mr. Watson had told you all these things, assum-  
6 ing that they be true, wouldn't you say that he deliberated  
7 and premeditated these murders, assuming that each and every  
8 one showed a certain amount of deliberation and premeditation,  
9 let's look at all of them in the amalgam, wouldn't all of these  
10 things in combination with each other indicate in your mind  
11 that he did deliberate and premeditate these murders?

12           A       If these things are all true, rather than the  
13 account Mr. Watson gave me, I think it would show some evidence  
14 of deliberation and premeditation at some level; again, realiz-  
15 ing we are dealing, which I still believe, with a very psychotic  
16 person under the -- heavily under the influence of drugs.

32f.

1 Q I believe that you also testified that in your  
2 professional opinion Mr. Watson did not have the mental  
3 capacity to materially and meaningfully reflect upon the  
4 gravity of the contemplated act of killing; is that correct?

5 A Yes.

6 Q Let's take Mr. Watson's shooting of Steven Parent.  
7 Do you think Mr. Watson had the mental capacity  
8 to know that he had a loaded revolver in his hand?

9 A Yes.

10 Q And let's assume, hypothetically, that Steven  
11 Parent begged Mr. Watson not to shoot him, not to hurt him,  
12 that he wouldn't tell anyone, and that Mr. Watson then went  
13 ahead.

14 Well, before I go any further, let's assume that  
15 Steven Parent begged Mr. Watson for his life.

16 Do you feel that Mr. Watson had the mental  
17 capacity to realize that Steven Parent did not want to die?

18 A In the state that he was, I think he had extremely  
19 limited capacity to realize this.

20 Q That Mr. Parent did not want to die?

21 A Yes.

22 Q Do you think that Mr. Watson had the mental  
23 capacity to know that when he pulled the trigger on the  
24 revolver a bullet would come out of the barrel?

25 A Yes.

26 Q Do you think Mr. Watson had the mental capacity  
27 to know that when he aimed the revolver at Parent, and pulled  
28 the trigger and the bullet came out of the barrel and it struck



1 Mr. Parent, that this might cause Mr. Parent's death?

2 A May I answer this -- this is going to have to be  
3 rather complex.

4 THE COURT: That is all right.

5 THE WITNESS: Mr. Watson told me, and I have noticed  
6 in some of the other reports also, the idea that all life is  
7 like a big lump of dough, that if one part of the dough is  
8 gone, it really doesn't die, that life continues to go on  
9 in mass, and whether even Mr. Watson lived or died, that it  
10 was part -- as if he had no individuality, but that his group  
11 and maybe the whole world would continue to live and that in  
12 a sense if one person would die, the lump of dough, or mankind,  
13 would continue to go on and this was meaningful life to him  
14 at that particular time.

15 Q In other words, what you are saying is that Mr.  
16 Watson when he shot Mr. Parent, he couldn't care less whether  
17 Mr. Parent died; is that what you are saying?

18 A No, I'm not saying that at all. I'm saying that  
19 if one person's life is in everybody, and everybody's life is  
20 in one person, if one person dies, that the mass of life  
21 continues to go on.

22 I think this is part of the whole psychosis that  
23 was involved in this folie-a-deux.

24 Q Then what you are saying then is -- correct me  
25 if I am wrong -- that Mr. Watson didn't care that much about  
26 whether or not he killed Mr. Parent. It didn't mean that much  
27 to him, snuffing out a human life.

28 A Within the framework of his philosophical belief



1 it meant nothing because life would go on.

2 Q But assuming that he later told Linda Kasabian  
3 to wipe the fingerprints off the knife, he was concerned  
4 enough, Doctor, not to be caught; is that correct? He had  
5 that much concern.

6 A One of the strange things about schizophrenia is  
7 the split mind where people can do some rational things and  
8 some irrational things and these can coexist side by side  
9 and I think this is why it is so difficult for a sane person  
10 to understand this type of conduct, unless you have seen, oh,  
11 I think even a person who has seen several thousand persons  
12 with schizophrenia can't really truly comprehend what goes  
13 on in their mind.

14 Q Going back just a little bit, Doctor, did Tex  
15 Watson tell you at any time that Manson sent him over on the  
16 night of the Tate murders from the Spahn Ranch, did he tell  
17 you that Manson told him to cut the telephone wires and after  
18 the murders to wash the blood off his body and to throw the  
19 clothing out over the side of the hill or throw the clothing  
20 away?

21 Did he tell you that?

22 A No, he didn't. His account was quite different.

23 Q I think on page 5 of your report, you say that  
24 Mr. Watson told you that at the scene of these murders he  
25 did only what the girls told him to do; is that correct?

26 A Yes.

27 Q And did you believe this?

28 A I think in having examined a number of people with

capital offenses, I always have some skepticism about what I am told.

Q Did you believe it more than you disbelieved it or vice versa?

A I think I tended, because of his pattern, his psychosis, as well as the pattern of drug taking, to believe more Mr. Watson's account.

Q Then whose account, Doctor?

Then whose account?

A Then the account, the hypothetical account that you are presenting me with.

Q Four girls were involved on these two nights of murder: Susan Atkins, Linda Kasabian, Patricia Krenwinkel, Leslie Van Houton. You never spoke to any of those girls to find out what their account was?

A I never have.

Q You never read any of their testimony in either trial?

A Only indirectly.

Q Yet you believed Mr. Watson?

A More than I disbelieved him, yes.

Q Is there anything about Susan Atkins, Linda Kasabian, Patricia Krenwinkel or Leslie Van Houton that would cause you to not believe them?

MR. KEITH: I will object to that question.

THE COURT: Sustained.

THE WITNESS: I never met them.

Q BY MR. BUGLIOSI: Doctor, on page 5 of your report,

1 I believe you say that Mr. Watson told you that he was so  
2 intoxicated that he fell backwards when he attempted to climb  
3 the fence at the Tate residence and the girls had to push  
4 him over the fence.

5 Did you believe that when he told you that?

6 A He presented it credibly. Yes, I did believe that.

7 Q Tell this jury is there one single solitary thing  
8 that he told you that you did not believe? Just one thing.

9 A You know I would have to go through my whole  
10 account, you know, and try to pick it out.

11 Q I don't think Judge Alexander would be happy about  
12 that. It might take a couple of hours, but can you think  
13 of anything right now that he told you that you did not believe  
14 or did you buy everything lock, stock and barrel?

15 A No, I think I have already said I did not buy  
16 everything lock, stock and barrel.

17 I think that I am being asked to say was this a  
18 lie and was this the truth, and I think that I am responding  
19 by saying that in any one statement there can be a certain  
20 amount of truth and a certain amount of falsehood.

21 And I think that in what I heard from Mr. Watson,  
22 for several reasons I think that there was a certain amount of  
23 truth in it and I think that as a psychiatrist I think that  
24 there is indirect evidence that indicates this.

25 Q Going back to the fact that Mr. Watson told you  
26 that he did whatever the girls told him to do at the scene,  
27 going back to that, let's assume hypothetically that Mr.  
28 Watson did tell Linda Kasabian to do the things that I have

1 already indicated.

2 A Yes.

3 Q Like wrapping up the knives and when they climbed  
4 over the fence, told the girls to get back in the bushes and  
5 then told her to go to the rear of the house.

6 Let's assume that fact.

7 A Yes.

8 Q You weren't aware of that hypothetical at the time  
9 you examined Mr. Watson?

10 A I was not aware of that hypothetical.

11 Q You are aware of the hypothetical now?

12 A I am aware of it now.

13 Q Okay. In view of that hypothetical, and in view  
14 of Mr. Watson's diametrically opposed version, what is your  
15 opinion?

16 MR. KEITH: If your Honor please, it is not diametrically  
17 opposed. That is an unfair question.

18 Q BY MR. BUGLIOSI: In view of Mr. Watson's different  
19 version, which version do you believe?

20 A I am not certain if presented with either version,  
21 with this type of bizarre crime, I am not sure that I would  
22 particularly believe either version completely because I don't  
23 see that there is any completely unbiased witness.

24 I think that the crime is so bizarre that I would  
25 assume, as a psychiatrist, that the people involved were  
26 extremely bizarre themselves and I am not sure that I would  
27 take either account as 100% true or 100% false.

28 I think that both accounts with the psychotic

1       bizarre nature of what happened would be open to some question,  
2       quite a bit probably.

3               MR. BUGLIOSI: Your Honor, I move to strike the doctor's  
4       statement that he doesn't believe any account would be  
5       unbiased. I think that would be a conclusion on his part.

6               MR. BURRICK: He certainly is in a position to render  
7       that opinion.

8               MR. BUGLIOSI: He certainly is not in a position.

9               THE COURT: The motion will be denied.

10              Q       BY MR. BUGLIOSI: I believe you said earlier that  
11       Mr. Watson's memory for remote events was good; is that  
12       correct?

13              A       That is correct.

14              Q       By remote events, what do you mean by that?

15              A       I mean things that happened several years ago,  
16       his experience in Copeville, Texas, his growing up, I think  
17       even during the period of moving into California, I think  
18       prior to getting on heavy drugs.

33R-1

1 Q Okay. So, by remote events you mean even prior  
2 to the murders?

3 A Yes.

4 Q I believe you did say that Mr. Watson's memory  
5 is grossly impaired now.

6 Why did you say that; where does he show a gross  
7 impairment of memory?

8 A This is mostly recent memory, and this is based  
9 upon the fact that during the interview, very frequently I  
10 would ask Mr. Watson something, he would begin to talk and  
11 then he would begin to perseverate, which is a sign of brain  
12 damage, usually; and then he would lose train of the question  
13 completely and multiple times would say, "What did you say?"  
14 or "What did you ask me?"

15 Now, this means that his memory storage for var-  
16 ious recent things is impaired; but I think that there also is  
17 a kind of fuzziness of account ever since he was on heavy  
18 drugs until the time he was off of them; and I would include,  
19 this is impaired recent memory.

20 Q Where do you find gaps in his memory -- or let's  
21 say, with respect to these murders -- now, you say he didn't  
22 tell you about the La Bianca murders?

23 A That's right.

24 Q Did he say he didn't have any memory or he didn't  
25 want to talk about it?

26 A No, in fact, he told me he wanted to tell me  
27 everything --

28 Q All right.

1           A       -- that he told me about taking belladonna root  
2 and that he would go in and out of periods of psychosis, that  
3 he couldn't remember anything; and this is such a typical  
4 story of people that are very heavy, let's say, psychidelic  
5 users, that they have these gaps come back into reality and go  
6 back into the gaps.

7                   He says he doesn't remember entering the house.  
8 He is not certain -- was uncertain whether some events occurred  
9 inside or outside of the house.

10                  This could be deliberate falsification, but it  
11 could also be spottiness of memory, because during the inter-  
12 view, I detected a lot of spottiness of memory just during the  
13 process of interviewing.

14           Q       Kind of a patchy type of amnesia?

15           A       Patchy amnesia.

16           Q       You are very well aware that patchy amnesia is  
17 characteristic of the criminals that are lying, aren't you,  
18 Doctor?

19           A       I'm very well aware of this. I am aware that it  
20 is characteristic of some other things, also.

21           Q       In other words, there seems to be a recollection  
22 of one event, and a lack of recollection with another event,  
23 kind of indiscriminately; it is kind of patchy?

24           A       Yes, this is also classically characteristic of  
25 the severe toxic effects of the psychidelic drugs, the people  
26 just in and out and in and out, so they, you know, with  
27 spotty --

28           Q       This patchy amnesia of Mr. Watson's, that could be



1 faked amnesia; is that correct?

2 In other words, he could have just been telling  
3 you that he didn't remember?

4 A Yes, it could be faked.

5 Q You have no way of knowing whether it is faked or  
6 not?

7 A I have no way of knowing for certain. I only have  
8 to gather multiple facts and try to render the best opinion  
9 I can.

10 Q Apart from patchy, faked amnesia, Doctor, isn't  
11 it true that now and then when a person does something that is  
12 very, very distasteful to them, they try to put that out of  
13 their mind?

14 MR. KEITH: I am going to object to the question, "apart  
15 from patchy faked amnesia."

16 Q BY MR. BUGLIOSI: Well, in addition to loss of  
17 memory, isn't there a situation, Doctor, where a person  
18 deliberately tries to put something out of their mind?

19 A Usually not deliberately, Counselor; it is usually  
20 an unconscious process that if someone has been involved in  
21 something of great magnitude that they unconsciously put it out  
22 of their mind.

23 Q It is kind of a protective mechanism --

24 A It can be.

25 Q -- to suppress something that is --

26 A Yes.

27 Q -- distasteful?

28 A But someone who does this would also reflect a



1 a very significant degree of disturbance.

2 Q Could this be the situation with Mr. Watson with  
3 respect to things he can't remember, that he is possibly trying  
4 to dispel these things from his mind, because they are too  
5 horrible to live with?

6 A This is possible, yes.

7 MR. BUGLIOSI: I am going into another area, your Honor.  
8 Does the Court want me to continue till 4:00. I can do it.

9 THE COURT: Can you finish by 4:00, do you think?

10 MR. BUGLIOSI: I won't be finished with the doctor by  
11 4:00, probably 10 after 4:00.

12 THE COURT: Well, if the jury is willing to work till  
13 10 after 4:00 to accommodate the doctor, it is all right with  
14 me.

15 A JUROR: Be our guest.

16 THE COURT: Suppose you proceed, Mr. Bugliosi.

17 Q BY MR. BUGLIOSI: Doctor, on Page 7 of your report  
18 you say that Mr. Watson shows paranoid ideations. What do  
19 you mean by that?

20 A Yes. At the time, this was a primary persecutory,  
21 people being against him, people severely mistreating him;  
22 and not only the fact, but his tremendous emotional reaction  
23 to it, a reaction far beyond what the events called for.

24 Q Well, whom did he feel was against him?

25 A Mostly the prison personnel.

26 Q Now, you realize that Mr. Watson has admitted  
27 killing seven people; you are aware of that?

28 A Yes.

#34

1 Q And you are aware that killing someone is against  
2 the law? The law kind of frowns against it.

3 A I am, yes. I am aware of that.

4 Q And you are aware that these individuals who work  
5 in prisons are members, as it were, of law enforcement; is  
6 that correct?

7 A I am aware of that.

8 Q What do you find unusual or bizarre or paranoid  
9 about Mr. Watson's feeling that these people, members of law  
10 enforcement, are against him?

11 What do you find paranoid about that? Isn't that  
12 kind of realistic?

13 A No, not really, if a person begins to cry and  
14 say over and over and over that they won't feed him vegetables,  
15 that they are deliberately avoiding feeding him and this keeps  
16 going over and over, particularly about food, and he cries and  
17 keeps telling over and over how mean the people are, in an  
18 obsessive kind of way, this is not a normal response.

19 I speak to many, many people who are on the other  
20 side of the law who say, "Gee, things are pretty crummy here,"  
21 but it is the quality of what he is saying and how he says it  
22 and the obsessive way in what he said and what he chooses as  
23 topics to talk about.

24 Q Well, say that he, Mr. Watson, is a vegetarian  
25 and he wanted a particular type of food and the jail being  
26 somewhat analogous to the military, they just have a certain  
27 menu each day, and they couldn't give him what he wanted,  
28 maybe what Mr. Watson told you is the truth, that they wouldn't

1 give him the exact type of food that he wanted. What would  
2 be paranoid about that?

3 A Counselor, I think every prisoner, if I questioned  
4 him about food complains about the food, but they don't extend  
5 it to the point of crying, of talking about it for maybe 10  
6 or 15 minutes during an interview and saying over and over  
7 that this represents specifically maltreatment directed toward  
8 him. That is the paranoid quality.

9 Q I believe you say, Doctor, that Mr. Watson had an  
10 organic brain syndrome of undetermined etiology.

11 A Yes.

12 Q And by etiology you mean cause?

13 A Right.

14 Q <sup>don't</sup> So you know what caused Mr. Watson's alleged  
15 brain syndrome; is that correct?

16 A That is correct.

17 Q You not only don't know what caused it, you  
18 don't know when it started?

19 A That is correct.

20 Q The brain problem could have occurred before these  
21 murders or after the murders, is that correct? Assuming that  
22 there is a brain damage, it could have occurred prior or  
23 after the murders?

24 A I think the brain damage being what it is, namely,  
25 usually a gradual onset, I would have to make the assumption  
26 that this kind of thing and of the magnitude I thought it was  
27 must have been in process for perhaps a couple of years.

28 Q Prior to the murders?

1 A Prior to the time I examined him.

2 Q And you examined him on what date?

3 A '71, March -- no, I think it was in May of '71.

4 Q You don't know whether he had any brain damage at  
5 the time of these murders?

6 A Not for certain, no.

7 Q Now, even assuming that Mr. Watson does have an  
8 organic brain syndrome --

9 A Yes.

10 Q -- let's make that assumption. Just because he  
11 had an organic brain syndrome, this wouldn't automatically  
12 and necessarily mean that he could not think in a rational  
13 fashion, does it?

14 A I don't think the question -- I think that to  
15 bisect out one element -- I would like to qualify this if I  
16 may.

17 A brain syndrome, which means some damage to the  
18 cerebral cortex, in itself would not severely impair judgment,  
19 but it would certainly make him very, very much more  
20 susceptible to the effect of hallucinogens, to the psychotic  
21 process that was going on, and I think these three would have  
22 to be considered as a package.

23 Q But the brain syndrome by itself would not  
24 necessarily impair judgment; is that correct?

25 A If a brain syndrome exists in the hypothetical  
26 individual by itself, it would not necessarily. It may but  
27 not necessarily.

28 Q Page 8 of your report, I believe you state that

1 Mr. Watson shows evidence of moderately severe depression.

2 Is that correct?

3 A That is correct.

4 Q Does the fact that he showed evidence of moderately  
5 severe depression, does that indicate to you some type of  
6 mental illness?

7 A Yes. It was of sufficient magnitude to say that  
8 it was associated with mental illness, yes.

9 Q Don't you think it normal and natural for Mr.  
10 Watson to be depressed inasmuch as he is being charged with  
11 seven counts of murder and facing a possible death sentence?  
12 Isn't that normal to be depressed?

13 A Not normal as I have seen him depressed because  
14 I have seen too many other persons charged with homicide that  
15 have not been that depressed.

16 Q Well, I am sure that he may have been depressed  
17 more than some people, Doctor, but I am talking about his  
18 depression in the abstract, not comparing it with anyone else,  
19 the fact that he was depressed, what do you find abnormal  
20 about that?

21 A The depression itself is not abnormal; it is the  
22 magnitude of the depression that is abnormal.

23 Q Let's assume that it is extreme, let's assume that  
24 it is gross, he is exceedingly depressed.

25 A Yes.

26 Q If he is facing a possible sentence of death, he  
27 is charged with seven counts of murder, what is abnormal about  
28 being exceedingly depressed?

1           A       I think to be psychotically depressed is always  
2 abnormal.

3           Q       Even if you are probably facing -- what do they  
4 call it, the guillotine, or something like that -- even if  
5 you are facing that, it is abnormal to be depressed?

6           A       No, it is not abnormal to be depressed. It is  
7 abnormal to be psychotically depressed, sir.

8           Q       Severely depressed?

9           A       Yes.

10          Q       With someone on their way to the gas chamber,  
11 if he shows extreme depression, is this a sign of mental  
12 illness according to you?

13          MR. BUBRICK: I think the form of the question is  
14 objectionable.

15          THE COURT: Sustained.

16          Q       BY MR. BUGLIOSI: I believe on the last page of  
17 your report you state that you do not believe that at the time  
18 of these murders Mr. Watson could form intent or malice.

19                   What does the word malice mean to you?

20          A       Associated with malicious thinking or a specific  
21 vendetta against a given person or persons.

22          Q       Certain hatred?

23          A       Yes.

24          Q       Animosity?

25          A       Yes.

26          Q       And you feel that he did not have animosity or  
27 hatred towards these individuals?

28          A       Yes. That I feel very strongly.

1 Q Therefore you conclude that he did not have  
2 malice aforethought; is that correct?

3 A Yes.

4 Q Do you feel, Doctor, that Mr. Watson intended to  
5 kill these victims?

6 A No. I think that in his psychotic process he  
7 intended to commit acts of homicide upon certain faceless  
8 entities, individuals who were not even individuals but part  
9 of the lump of dough of humanity, and that if they were gone,  
10 that life would proceed, that all humanity was just one big  
11 lump.

12 Q Are you saying then that when he stabbed these  
13 victims over and over again in his mind he was just stabbing  
14 dough?

15 A I would like to refer to his account, which I think  
16 is credible for a person, you know, that is psychotic and  
17 under a hallucinogen. "Without hesitation or thought he  
18 further states that he just kept saying (humming) --" he told  
19 me in such an emotionless mechanical way, that I think it  
20 was a reflection of the way he viewed the whole process, a  
21 robot-like thing.



35R-1

1 Q So it is your conclusion, then, Doctor, that  
2 when he was stabbing these people and shooting them he did  
3 not intend to kill them; is that your conclusion?

4 A He may or may not have intended to kill them, but  
5 I don't believe there were any feelings or any feeling that  
6 these were really human beings.

7 Q Do you have an opinion as to whether or not he  
8 intended to kill them?

9 A Yes, I think he did intend to kill hypothetical  
10 faceless human beings, yes, in a robot-like fashion under the  
11 direction of his mentor, Charles Manson.

12 Q It is your final recommendation, Doctor, that Mr.  
13 Watson be sent to a hospital where he can receive medication  
14 and custodial care; is that correct, Doctor?

15 A That was my recommendation at the time, yes.

16 MR. BUBRICK: Thank you.

17  
18 REDIRECT EXAMINATION

19 BY MR. BUBRICK:

20 Q Doctor, do you believe in the death penalty?

21 A Do I believe in the death penalty? I am not  
22 categorically opposed to it.

23 Q Does that mean, then, that you believe in it under  
24 certain circumstances; is that correct?

25 A Under certain circumstances.

26 Q And certain factual situations?

27 A Yes.

28 Q Doctor, did the district attorney's office ever



1 call you up and say they have a witness by the name of Linda  
2 Kasabian whom you might examine, if you wanted to?

3 A They did not.

4 Q Did they say, "We have available the testimony of  
5 a witness by the name of Linda Kasabian, that you are free to  
6 read if you want to"?

7 A No.

8 MR. KAY: Now, this is improper, because this is his  
9 psychiatrist.

10 THE COURT: This is the court's psychiatrist.

11 MR. KAY: May we approach the bench?

12 THE COURT: You just sit where you are. This is a court  
13 appointed psychiatrist; he is appointed by the court.

14 MR. KAY: If he was appointed by the court, why did he  
15 give Mr. Bubrick his psychiatric report?

16 MR. BUBRICK: And you got a copy of it, too.

17 THE COURT: Just a second, Gentlemen; I have made my  
18 ruling. He is a court appointed psychiatrist.

19 Q BY MR. BUBRICK: Dr. Bohr, do you know who Linda  
20 Kasabian is?

21 A Only by newspaper accounts.

22 Q If you knew that she was one of the people  
23 indicted for this offense and if you knew she was granted  
24 complete immunity by the district attorney's office after --

25 MR. BUGLIOSI: That is a misstatement, your Honor; the  
26 district attorney's office does not have the power to grant  
27 anyone immunity. The Court, only, has that power.

28 Q BY MR. BUBRICK: If there was a recommendation that

1 she be granted complete immunity by the district attorney's  
2 office, which the Court then honored by a signed order, will  
3 you consider such a person an unbiased source of information?

4 A No, I would not.

5 Q Do you think she might have some motive for wanting  
6 to testify the way she did?

7 MR. BUGLIOSI: This calls for a conclusion, your Honor.

8 THE COURT: Well, that is what you mean by an unbiased  
9 person, is that correct, one who might have a motive to testify  
10 the way she did?

11 THE WITNESS: Yes, I think that someone under those  
12 circumstances would have a strong motive to testify just like  
13 an accused would have a strong motive to testify a given way.

14 Q BY MR. BUBRICK: Doctor, you said that you thought  
15 that Mr. Watson was a latent schizophrenic, perhaps before he  
16 came to California and became involved with the Manson family?

17 A Based on my previous experience with many, many  
18 people like that that get heavily strung out on drugs, this  
19 has been my experience, yes.

20 Q But he was latent before he became involved with  
21 drugs; is that correct, in your opinion?

22 A This, I would believe, yes.

23 Q Would that latent, in your opinion, would the  
24 latent schizophrenia that he suffered under before he became  
25 heavily involved with drugs be the type that would induce a  
26 homicide?

27 A I would guess, being the type that it was, that  
28 maybe it never would have surfaced without heavy drug usage

1 or indoctrination.

2 Q In other words, the drugs might very well have been  
3 the triggering mechanism for this schizophrenia, is that correct?

4 A Yes.

5 Q And they might very well have been the triggering  
6 mechanism for the homicides; is that correct?

7 A Yes.

8 Q Now, without ever having talked to Linda Kasabian,  
9 would you have any way of assessing her credibility?

10 MR. BUGLIOSI: Oh, your Honor, this is going way, way  
11 too speculative.

12 THE COURT: Sustained.

13 Q BY MR. BUBRICK: Would you have any way, Dr. Bohr,  
14 of knowing whether the hypotheticals Mr. Bugliosi put to you  
15 are in fact true?

16 MR. BUGLIOSI: Your Honor; it was stated as a hypothetical.

17 THE COURT: There will be an instruction covering that.

18 Q BY MR. BUBRICK: Is there, in your opinion, Dr.  
19 Bohr, a difference between being told what to do by somebody  
20 like Manson and doing something independent of that?

21 A I think for a psychotic individual that I believe  
22 was living as an alter ego or a folie a deux and who could not  
23 even separate his identity from Charles Manson, I think there  
24 is a tremendous difference in that type of individual when he  
25 is programmed or instructed, than the ordinary individual who  
26 would do something volitionally.

27 Q And does LSD permit the programming of an individual  
28 so far as you know?

1           A       Yes, two of the best works that have been written  
2 on thought influencing that I can think of shows that psychi-  
3 delics and other drugs strongly enable a person to be programmed  
4 for thinking.

5           Q       Now, there was also some reference to patchy  
6 amnesia, Doctor Bohr.

7                   Do you have a feeling that that continued during  
8 the five hours of any of the time that you spent with Mr.  
9 Watson?

10          A       I'm not certain I understand your question,  
11 Counselor. Could you repeat it, perhaps?

12          Q       Yes. Did you get the feeling during the five  
13 hours that you were talking to Mr. Watson that he was con-  
14 sciously trying to feign amnesia?

15          A       No, I did not; and I think the one thing that made  
16 me believe that he was not, is that his account seemed -- he  
17 was repetitive and seemed to be consistent; and I believe that  
18 with brain damage, people cannot memorize a memorized story  
19 over a five-hour period or between two widely separated dates,  
20 because I did go back and cross-check and it was the same  
21 story; and with brain damage, I don't believe this kind of  
22 memory would be possible.

23                   I personally don't believe it would be possible.

24          Q       Did you know anything about Mr. Watson's background  
25 as an athlete prior to the time he came to California?

26          A       Yes, I did.

27  
28

35AR-1

1 Q And would it have been consistent or inconsistent  
2 with the type of brain damage that you observed in 1971, or  
3 that you concluded existed in 1971?

4 A Yes; Charles Watson was a star athlete. I had the  
5 opportunity to observe Mr. Watson when he did not know I was  
6 observing him; namely, every time he walked down a long prison  
7 corridor he did not walk as a coordinated man, he didn't have  
8 the normal swing and gait.

9 I did some other neurological testing, which tests  
10 coordination, which controls balance and that type of thing.  
11 One of these tests is doing something like this, which is  
12 called a dysidiadkokinesis.

13 He showed very, very poor performance on that at  
14 that particular time, which hit me was a reflexion that he  
15 was not a coordinated person that a star athlete a few years  
16 before was.

17 Q So that I take it, then, that you don't think that  
18 the kind of brain he had or the coordination he had at the  
19 time you examined him would have permitted him to function as  
20 the kind of athlete he was in high school days?

21 A Definitely not.

22 MR. BUBRICK: I have nothing further, your Honor.

23 MR. BUGLIOSI: I have some more questions.

24  
25 FURTHER CROSS-EXAMINATION

26 BY MR. BUGLIOSI:

27 Q Did Mr. Bubrick ever tell you, Doctor, not to  
28 show your reports to any member of the district attorney's

1 office until you were ordered to do so by the Court?

2 A No, he did not.

3 Q Did he ever indicate that to you at all?

4 A No, he did not.

5 Q Who is the first person you ever spoke to with  
6 respect to this case?

7 A I believe it probably was Mr. Bubrick. I don't  
8 know if it was before or after I examined Charles Watson.

9 Q All right. Did Mr. Bubrick call you?

10 A I believe I got the order from Judge Lucas and I  
11 think I subsequently got a call from Mr. Bubrick.

12 Q And you spoke to Mr. Bubrick about these offenses?

13 A Yes, prior to being here, I did have -- I have  
14 spent some time with Mr. Bubrick, both out in the hall and  
15 previously.

16 Q In fact, your report is to Mr. Sam Bubrick; is  
17 that correct?

18 A You know --

19 Q He is what they call the addressee; he is the per-  
20 son to whom you sent the report; is that correct?

21 A Yes, this is correct, you know.

22 Q Why did you send it to Sam Bubrick when Judge Lucas  
23 appointed you --

24 MR. KEITH: Object to the question as immaterial.

25 THE COURT: Sustained.

26 THE WITNESS: I can answer this, but --

27 THE COURT: Don't bother, Doctor.

28 Q BY MR. BUGLIOSI: So you sent your report to Sam

1 Bubrick and he is the one who first spoke to you over the  
2 telephone; is that correct?

3 A That's correct.

4 Q You did read, Doctor, several other documents or  
5 reports with respect to Mr. Watson; is that correct?

6 A Yes.

7 Q A report by Dr. Frank?

8 A Yes.

9 Q Dr. Pollack?

10 A Yes.

11 Q Dr. Palmer?

12 A Yes.

13 Q The Atascadero records?

14 A Yes.

15 Q The County Jail medical records?

16 A Yes.

17 Q Who gave you these records?

18 A The County Jail records I saw in County Jail; the  
19 Atascadero State Hospital were on his County Jail record;  
20 George Abe's report was on the jail records; C. Meyer Pollock's  
21 report was on the jail records.

22 I believe that when I first spoke to Mr. Bubrick,  
23 I did ask for some background information and I was sent Dr.  
24 Crahan's report and subsequently Mr. Bubrick forwarded other  
25 reports to me, yes.

26 Q But Mr. Bubrick did not submit to you or send  
27 to you Linda Kasabian's testimony at the last trial or this  
28 trial, or Susan Atkins' testimony at the Grand Jury; is that

1 correct?

2 A He did not.

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#36

1 Q Doctor, with response to whether or not a person  
2 under immunity is a biased or unbiased witness, are you aware,  
3 Doctor, that one of the conditions of immunity before the  
4 judge grants immunity, one of the express conditions of  
5 immunity is that the person granted immunity testify truthfully  
6 at the trial.

7 Are you aware of that?

8 MR. KEITH: If your Honor please, I object to the  
9 question.

10 THE COURT: The objection is sustained.

11 MR. BUGLIOSI: It is part of the immunity agreement,  
12 your Honor.

13 THE COURT: That will be stricken. Disregard that,  
14 ladies and gentlemen.

15 Q BY MR. BUGLIOSI: How many times have you spoken  
16 to Mr. Bubrick since you have been on this case, Doctor Bohr?

17 A I think I have had one telephone conversation  
18 with him. I think I have had one personal conversation and  
19 then I spoke to him in the hallway today.

20 Q How about Mr. Keith?

21 A Mr. Keith was present at one time that I spoke to  
22 Mr. Bubrick.

23 MR. BUGLIOSI: Thank you, Doctor. Nothing further.

24  
25 REDIRECT EXAMINATION

26 BY MR. BUBRICK:

27 Q When did we first meet, Dr. Bohr?

28 A I think it was about a week and a half ago or a

36-2

1 week ago.

2 Q The first time we ever talked it was face to face,  
3 wasn't it?

4 A Yes, and this was with Mr. Keith as well.

5 Q He was present at the same time?

6 A Yes.

7 Q And do you remember the nature of our telephone  
8 calls?

9 A It was mostly I think about information, background  
10 information.

11 Q Only about the Texas material, right?

12 A Yes.

13 Q Was there any discussion between you and me about  
14 the nature of these acts or did I tell you anything at all  
15 about what he was alleged to have done?

16 A No, you did not.

17 MR. BUBRICK: I have nothing further.

18  
19 RECROSS-EXAMINATION

20 BY MR. BUGLIOSI:

21 Q When did you talk to Mr. Bubrick on the telephone  
22 for the first time?

23 A I think Mr. Bubrick called me, if I remember  
24 correctly, and I was out and I returned his call and he said  
25 that I had been appointed to examine Charles Watson. I think  
26 he said there was some information available. I requested that  
27 if I could get the reports of people like George Abe and  
28 Marcus Graham and the Atascadero report, as well as maybe the

36-3

1 Grand Jury thing, that I would like to see and that is about  
2 the extent of it.

3 Q You asked Mr. Bubrick for the Grand Jury proceedings?

4 A I believe I did. I am not sure whether I received  
5 it or not.

6 Q In any event, when did you have this telephone  
7 conversation with Mr. Bubrick?

8 A Oh, I would guess around, let's see --

9 Q Just approximately, Doctor.

10 A Sometime in May, I believe.

11 Q May 1971?

12 A Right.

13 MR. BUGLIOSI: Thank you. No further questions.

14  
15 REDIRECT EXAMINATION

16 BY MR. BUBRICK:

17 Q Do you remember me calling you a couple of times  
18 to ask you how soon I could get your report?

19 A Yes. Mr. Bubrick did bug me about my report and  
20 I did have a secretary change, quite devastating to me, and  
21 that was the reason the thing was sent to Mr. Bubrick instead  
22 of Judge Lucas and I am still struggling with that personal  
23 problem, unhappily.

24 THE COURT: Anything else?

25 MR. BUGLIOSI: No, your Honor.

26 MR. BUBRICK: No.

27 THE COURT: Thank you, Doctor. You may be excused.

28 Ladies and gentlemen of the jury, we will recess

36-4

1 at this time until tomorrow at 9:30.

2 Do not form or express any opinion and keep an  
3 open mind.

4 Please remember what I told you about the news media.

5 Thank you,

6 (An adjournment was taken until Thursday, September  
7 16, 1971 at 9:30 a.m.)  
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