

**SUPERIOR COURT OF THE STATE OF CALIFORNIA IN AND FOR THE COUNTY OF SAN MATEO**

**Plaintiff, vs.**

**ANANDA CHURCH OF SELF REALIZATION, a California not-for-profit corporation; CRYSTAL CLARITY PUBLISHING, a California corporation; DANNY LEVIN, individually and ) as an employee of CRYSTAL CLARITY PUBLISHING and/or ANANDA CHURCH OF SELF REALIZATION; DONALD J. WALTERS, individually, and an employee of ANANDA CHURCH OF SELF REALIZATION and CRYSTAL CLARITY PUBLISHING; DOES 1 to 50;**

**No. 390 230**

**DECLARATION OF XXX IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDENTS' MOTION FOR SUMMARY JUDGEMENT**

I, XXX, declare:

1. I am not a party to this action, am above the age of eighteen and am a resident of Nevada County, California. I could and would testify to the following in open court. I have first- hand knowledge of the following matters and facts.
2. In the time period of 1967-1969 I went to the Ananda community for a retreat. During one day, I and my four-year old son, went with a group of people ledby Swami Kriyananda (also known as Donald Walters) went for a walk in the hills.
3. During the course of our walk we all went "skinny- dipping" in a pool of water. While in the water, Kriyananda reached under the water and touched my breasts with his hands. I drew away.
4. During the following evening of the same day, a few of us were sitting outside in the dark with Kriyananda who was sitting in a chair. I was sitting cross-legged on the ground near him. Suddenly, Kriyananda grabbed my head with his hands and thrust his crotch against the back of my head. I immediately pulled free, got up and left for my tent.
5. This incident was a shock to me. I took a while to assimilate the experience and its reality. I had been around Kriyananda many times and even alone with him while performing office work for him. I had never experienced this kind of behavior from him before. I loved and revered him as a high and holy person.
6. The next day I approached Kriyananda, shook my finger in his face, and said, "You should be ashamed of yourself." He simply replied, "Well, you went along with it." I then left Ananda and never came back. Kriyananda never made any effort to apologize or even account for his indecent behavior.

Under penalty of perjury and pursuant to the laws of the State of California, I hereby declare that the foregoing is true and correct.

Executed February 6, 1995, at the County of XXX, State of California.

Signed,

XXX