Plaintiff's Exhibit #3

lowa District Court, Muscatine County, on remand from 293 N.W.2d 216 (lowa 1980)
State of lowa v. Carl Eric Olsen, Case No. 738-578, May 28, 1982
MELANIE DREHER,

- called as a witness on behalf of the Defendant, after being first duly sworn by the Court, was examined and testified
- 4 | as follows:

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DIRECT EXAMINATION

BY MR. COOK:

- Miss Dreher, for the benefit of all involved, would
 you make sure that all of your responses are oral and loud
 enough so that we can all hear you, please.
- 10 A. Sure.
- Would you please give your full name, your address and your occupation to the Court.
- A. It's Dr. Melanie Dreher. I live in New York. Do
 you want a specific address?
- 15 Q No, that's fine.
- 16 A. I'm assistant professor at Columbia University.
- Q What is your major field of expertise, Miss Dreher?
- A. I have a Ph.D in anthropology.
- 19 Q Would you give the Court a brief background of your 20 educational experience?
- 21 A. My doctorate in anthropology is from Columbia 22 University; that included several periods of research in 23 Jamaica and the West Indies. I started doing research on 24 chronic marijuana use there in 1969 and have continued off
- 25 and on for the last ten years.

I have done a second study of childhood marijuana use 1 in 1980 and '81, and currently have a proposal in with the 3 | Federal Government to study the effects of marijuana smoking on pregnancy and lactation and neonatal health. I have also been a postdoctorate fellow for the National Institute on Drug Abuse and have a joint-appointment 7 with Teacher's College at Columbia University. Dr. Dreher, what was your doctoral dissertation entitled? The title of the dissertation, which is now 10 published as a book, is Working Men and Ganja. Was this based upon your study of the use of Ganja 0. 12 in Jamaica and the West Indies? 13 This was based upon that study of three rural Jamaican communities in the parish of St. Thomas; comparing 15 the use by farmers of marijuana in those three communities. 16 Do you belong to any professional societies? 17 Q. I belong to the American Anthropological Associa-18 tion, the Society for Applied Anthropology, the Northeastern 20 Anthropological Association, American Public Health Associa-21 tion.

- 22 A Have you published other works or magazine articles, 23 in a professional capacity?
- A. Yes, I have. I'm sorry I can't give you the refer-25 ences right now. One is due to be published in Human Organi-

zation, one is published in the West Indian Journal, and 2 I've given several papers, about four of which have been published in the proceedings of those meetings. Dr. Dreher, have you been recognized as an expert 4 witness in any federal court? Yes, I have, in Miami and in Springfield, Mássachusetts. Have you been recognized in any state courts as an expert witness? I don't think so, no. 10 MR. COOK: Perhaps we could ask the Judge to 11 recognize you as an expert witness. 17 THE COURT: I would acknowledge that. 12 Miss Dreher, on your studies of -- first of all, 1.1 tell the Court what is Ganja? 15 Ganja is the Jamaican term for cannabis or A. 16 It has an East Indian name because it was brought marijuana. i 7 to Jamaica by East Indians following manumission. 18 Is that a pile of Ganja that we have here in front 16 of us? Can you tell or does it appear to be? 20 Well, I can't tell from here. It smells as though A. 21 it is. 22 In your studies in Jamaica did you ever have occa-23 sion to become involved with the Ethiopian Zion Coptic 24

Church?

In my second study, which took place Yes, I did. 1 2 in 1979, 1980, '81, I went back to the area where I had done previous field work, which was in St. Thomas. And one of the 4 properties that had been owned by the Post Mistrees (phonetic) 5 and White Horses had been purchased by a group called the Ethiopian Zion Coptic Church. This was about a 1,500 acre parcel of land.

I asked local residents about the church, and they said that they had cleared the land, established several head of -- hundred head of cattle on the land and were essentially large -- currently large farmers in the area.

Did you have occasion to do a professional study Q. of the Ethiopian Zion Coptic Church?

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Well, I studied the church peripherally from the A. point of view of the outside community when I was -- or the larger community when I was doing that study. But I never 17 had a chance to study the church internally.

I was employed by Ramsey Clark to testify for the church, 19 at which point, I said I could not testify until I did at least a small study of the church.

- Did you undertake specifically to go back to Jamaica, I take it a third time, to specifically study this 23 'church?
- I went back, actually, three more times to look at 25 that church. I went in December of 1979, March -- not '79,

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'80 -- March of '81 and April of '81. '81 -- sorry, it's
   '80. It is '80.
             Approximately how much time did you spend studying
   the Ethiopian Zion Coptic Church?
             Altogether close to two weeks.
        A.
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             Did you do any research on this particular church
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   outside of your field study?
             As opposed to that -- I'm sorry?
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             Did you do any library research or --
                       I researched in the sense that I had to
             Oh, yes.
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  compare it to other Rastafarian movements and put it into
   the context of West Indian religion and Jamaican religion,
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   specifically.
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             Dr. Dreher, is there a commonly accepted definition
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  of a religion?
             There are several commonly accepted definitions
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   of religion. Probably the most accepted one is that it is
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   an organized system of belief and practice which recognizes
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  sacred objects and belief in a supernatural being, and it
20 | also has to -- there has to be a church in -- not a physical
   church in that sense, but a group of individuals who share
22 that belief and which includes both laymen and priests.
              Compared to that definition of a church, did you
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24 ahalyze the Ethiopian Zion Coptic Church?
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Yes, I did.

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Q What did you find? What were the results that you arrived at when you held the Ethiopian Zion Coptic Church up to that standard?

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- A. That the Ethiopian Zion Coptic Church falls well within the definition of religion, and certainly in its earlier stages of religious development, in the sense that it may not be as formalized as some of our more traditional religions like Catholicism or Protestantism, but it would be comparable to Protestantism in the earlier days of the reformation, but certainly well within the definition of religion.
- Q Did you find a group of people practicing this religion?
- A. Yes, I did. I found, actually, two groups of people; one located in White Horses in Jamaica and -- where many of them resided on a gospel camp and there were others who resided outside the camp as well, and then another group at Star Island in Miami.
- Q. Did you find a belief in a supernatural being as an integral part of the tenets of that church?
- A. Yes, there is. The church is basically a Christian church. According to the doctrine of this church, the mantle of prophecy was passed from Jesus to his disciples and then for several hundred years this prophecy was hidden from black men. Then it was passed to Marcus Garvey, who

was a political and religious leader in Jamaica and other West Indian islands in the late 1920s and '30s.

Then that mantle of prophecy was passed from Marcus Garvey to the founder of the church, who was Louva Williams.

Q. Can you describe for the Court briefly what the basic premise of the Ethiopian Zion Coptic Church -- what is the basic tendency of that church?

A. There are a few. One has to do with the concept of Jesus, which they have conceptualized as Jes-us, meaning that Jesus is within every man. They do not believe in a -- what they would call a Sky God or a God up in heaven; that when you die you are going to go up there.

They believed that in each of us there is a deity and consequently, that every time one man is in communication with another man, he is in communication, essentially, with God and with Jesus.

Another concept is the -- the sort of -- how would you describe it -- the duality of the religion, which derives, certainly, from the King James verson of the bible, but then again from a hidden prophet -- or the prophecy that was hidden for so many years from black men, that has to do with the juxtaposition of good and evil, natural and unnatural, clean and unclean. So that things that are -- are natural are also good, they are holy and sacred.

Ganja is a -- considered a sacred object in the church

- position of being the sacrament of the church.
 - Q Dr. Dreher, in your studies of the Ethiopian Zion Coptic Church did you ever hear a term called "a life of living"?
 - A. I can't say I did, actually.
- 9 Style that the individual members must subscribe to?
- A. Well, I -- certainly, it could be described in more than one term. They would describe their life style by many terms I believe; natural, good, holy, righteous.
- Would you describe their life style as being a strict religion?
- They are an extremely moralistic, extremely rigid religion, I think, in comparison with other religions.

The members are not permitted to dance, they are not permitted, really, to have any kind of social or recreational activities. The women are required to wear long dresses,

- cover their heads, or at least cover their hair. Women are
- not permitted to wear makeup. Neither men nor women wear
- jewelry, with the exception of perhaps a watch.
- The men are expected not -- are prohibited from trimming their hair, so that they let their hair grow, and they also -- or from trimming beards as well.

They are, in that respect, similar to other Rastafarian movements, except that other Rastafarians leave their hair in what they call dreadlocks and the Ethiopian Zion members insist on combing their hair and they do not wear dreadlocks.

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- Q Is there a prohibition or proscription concerning diet in this particular religion?
- A. They obey most of the dietary laws outlined in Leviticus in the Old Testament so that they are not permitted to eat pork, for example, or any crustaceans. The beef has to be killed in a certain way and that is by hanging the cow -- cattle upside down, then slitting the throat and letting the blood drain out on the ground.

They eat food that is natural and unfertilized or --

- Q. Dr. Dreher, you indicated that they -- the church itself believes in biblical authority for their diet. Did you find that there is a biblical authority or biblical guideline for virtually everything they do within their life style?
- their life style the bible is a guide. And, actually, the reasoning that goes on among members of the church is interpretation of biblical scriptures and how that applies to -not only to their life style, but to the reactions of other people to their life style.

- Q Dr. Dreher, did you find an organized study of the bible by the members?
 - A. Well, what do you mean by "organized"?

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- Q Let me ask you this: Was there an organized discussion of the bible on a regular basis by the members of the church?
- A. There was constant discussion of the bible by members of the church. "Organize" is not guite the way I would choose to describe it, but it's -- it's not systematic in the sense that there are formal kinds of classes set up or seminars or anything like that, but the bible is a part of practically every discussion that takes place among members of the church.
 - Q. You used the term "reasoning:" Dr. Dreher, what would a reasoning be? How would you describe that?
 - A. Reasoning is a theological discussion among members of the church, but for the most part only men of the church.

While the men are reasoning and engaging in this theological discourse, the women are expected to sit around the perimeters and not to join in the discussion. The reasoning is the -- perhaps the less formal type of communication or prayer.

The oblations are the more formalized method of prayer.

The oblations start at between 4:30 and 5:00 in the morning

and continue until 8:00 -- 7:30, then they start again at 3:00 in the afternoon and continue until 5:00 and then they start again at 8:00 in the evening and continue until about And during the oblations -- well, each brother of 11:00. the church is -- when he enters the church is given a chant or hymn, and -- esentially they are hymns, they're just called chants withing the framework of the church -- and each brother raises a chant or a hymn, and then they -- the other members of the church join him in singing this hymn. During this time, of course, the chalice or sacred pipe 10 is passed among the members of the church, but again only the brethren. The sisters have their own pipe. 12 During this oblation is there reading of the bible 13 and discussion of the bible? 14 There is a reading -- an interpretation of the 15 psalms of the bible, so it usually goes psalm, chant, psalm, 16 chant, psalm, chant for at least two and a half to three 17 hours. 10 How often would these oblations take place? 0. 10 Well, three times a day every day. A. 20 Seven days a week? 0. 21 Seven days a week. A. 22 Dr. Dreher, let's return to the use of Ganja within 23 the Ethiopian Zion Coptic Church. I believe you mentioned 24 that the use of Ganja has assumed the role as the sacrament 25

of the church, is that correct?

- A That's correct.
- Q Would you explain that more fully for the Court, please?
 - A. Okay -- and by the way, it's not a sacrament just for the Ethiopian Zion Coptic Church. It is generally recognized among other Rastafarian sects that this is the sacrament.

The sacrament is a form of communion that is, if Jesus is in ourselves or is in other man -- other men, then this communication should allow you to become closer to Jesus and communication with yourself as well.

Ganja is seen as the sacred substance that enhances that communication and brings you in closer communication with God or Jes-us.

- Q Is Ganja used only at certain times by the Coptics or is it used generally all of the time, or can you answer that?
- A. It's used throughout the day; when the brothers are reasoning, during oblation and also during work.

The belief is that Ganja is a good, natural, holy substance and will make you then work harder if you are smoking it while you work. So it's virtually used all day long.

The only -- but it's not an indiscriminate use. If a brother has in some way violated a rule of the church or acted in a

way that the elders of the church find unbecoming or disruptive, an injunction is put on that person and they are not to pass the pipe and they are not allowed to smoke any Ganja.

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When -- women, for example, are in separation during their menses or after having a baby. They are again considered unclean and not permitted to either touch the bible or smoke marijuana.

so, yes, it is virtually used all the time, but not indiscriminately and not everyone has access to it.

- Q Dr. Dreher, marijuana is sometimes referred to as a recreational drug. Have you ever experienced or seen the Ethiopian Zion Coptic Church use Ganja or marijuana in any recreational activity or way?
- A. I think the -- that the -- the Coptic Church would reject the notion -- in any way would reject the notion that they are using it recreationally. I have never seen them use Ganja recreationally. I think it would be opposite to the tenets of the church; thoroughly unacceptable.

It is used recreationally in Jamaica in general, but certainly not among the Rastafarian groups.

- Q By the Coptics themselves are you then saying that Ganja is used only for religious purposes?
- A. I would say only for religious purposes and for purposes of health.

- Q For purposes of health. Is this directly tied in with their religious belief?
- A. It is. It's described as God's medicine and therefore is boiled in teas, is boiled into various kinds of medicines and tonics and potions. It's applied topically to cuts, sores, bruises, burns. It has -- enjoys general widespread use among this group.
 - Q Have you ever seen it used as seasoning on foods?
- A. Not to season foods; it's cooked in foods, cooked in soup, for example.
- Q Dr. Dreher, about how long did you have an opportunity to study the church in Miami Beach, Florida?
 - A. I would say altogether about five days.
- Q Do you feel that you had a sufficient basis for observation to make ---
 - A. Yes.

- Q -- certain objective statements about that church?
- A. As an anthropologist I would always love to have more time to study a particular group, but this -- it was not difficult to -- unlike other anthropological studies, it was not difficult to gain access to this group and to immediately start asking what I would consider as an anthropologist the most vital questions. I had access to all the members and I also -- well, not in Miami, but in the Jamaican gospel camp, was able to interview people who were

outside the church so that I could get a total picture of 1 this church. There was no language barrier preventing you from 3 ! asking questions in Miami? I speak and understand the Jamaican patois so I could understand the Jamaican members as well as the white, american members. Did you conduct any physical testing of any kind, doctor? 9 No, I didn't. A. 10 It was a speaking interview? Is that the proper 11 way to put it? 12 Speaking interviews, direct observations, inter-13 views with the non-coptics, observations of the oblations. Dr. Dreher, the coptic church in Jamaica is 15 primarily a black church, is it not? 15 Yes, it is. 17 ħ. The Rastafarian movement is primarly a black 13 movement, is it not? Įψ Actually, this is the only sect that allows white 20 21 members. Dr. Dreher, you indicated that the religion arose 22 in the late 1920s early 1930s through Marcus Garvey. 23 the church itself trace its history further back than that period of time? 25

A. Well, they certainly trace an ideological history back to the beginnings of Christianity. I think every church has a myth -- an idiological myth that's attached to it.

It's part of the definition of being a church. So the church -- it certainly has an ideological history which would stretch back that far, but, in fact, the actual origins -- the practical physical origins of the church one could say came in the early 1930s.

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- Q In relation to other recognized churches in this particular country, is that considered to be quite young, quite old or someolace in between?
- A. I don't -- I would say it's someplace in between.

 It's certainly not of very recent development. I think it's a young church, but I can think of several churches in New York City that are younger than that one and yet have a full-blown congregation, a system of belief that falls well within the definition of religion.
 - Q Dr. Dreher, in the academic community is there general agreement or disagreement as to the validity of this organization; by that, the Ethiopian Zion Coptic Church as a church organization?
 - A. Well, I -- I have conversed with two other anthropologists. Two of them have been to visit the church. We have agreed that this is a church, and I -- I would put money on another anthropologist going down and finding that it

wasn't a church. I think it falls well within the accepted anthropological definitions of a church.

- Dr. Dreher, does the organization that you found Q. in Miami, likewise, fall within this definition of a church?
- Well, I wouldn't call them two separate churches. I would say that it's a satellite; a branch of the main church that's in Jamaica.
- Therefore you found this organization in Florida 9 also to be within the bounds of being a church?
- Well, yes, and they were consistent with the A. practices and beliefs of the church in Jamaica; they performed oblations, they are natural food, the sisters and brothers still functioned along the same kind of demeanor and deportment.
- Did you have occasion to meet or to recognize 15 Mr. Carl Eric Olsen during your studies of the Ethiopian Zion Coptic Church?
- I met Carl -- I'm not sure whether it was the A. 8 December trip or the March trip, but yes, I did -- we met.
- Where was that? 0. 20 :

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- That was at 43 Star Island in Miami. 21 A.
- That is the Miami headquarters of the Coptic Church? 22 :
- That's right. 23 A.
- Do you know Mr. Olsen personally or have you ever Q. 24 had a chance to interview him or analyze him?

- A. Not separately from the rest of the members, but

 I've heard him in reasoning with the other brothers, and he's

 been identified to me by other members as a brethrened

 member of the church.
 - Q. Dr. Dreher, did you have an opportunity to ascertain who is the head of the Coptic Church in America?
- Well, the brothers themselves might say that every -that -- paint a very democratic picture of the church, but, in fact, if you look at who lights whose chalice, there is 9 a hierarchical system and a kind of pecking order within the 10 And I would have to say that in Jamaica, Keith 1.1 Gordon is the head of the church, and the other two elders 17 that are very -- other brothers that are close to him are 3 Brother Wally and Brother Sampson. And if Keith was in the 14 United States, he would be recognized as the head of the 15 In the United States I would say that Brother Louv 16 church. is commonly recognized as the head of the church. 17

MR. COOK: I have no further questions, Dr. Dreher.

CROSS-EXAMINATION

2(t BY MR. PETERSEN:

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- Q Doctor, do I understand that this is a male dominated church?
- 23 A. Not necessarily in terms of its membership, but 24 in terms of its rules. They believe that God is the head 25 of man and man is the head of woman.

Q Could you give me an idea of a breakdown of the membership as to percentages between men and women?

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- A. I'm not sure I can do that. In the United States there tend to be more men than women. And I think there are about a couple hundred -- these are real guesstimates, you know -- couple hundred members in the United States. In Jamaica I would say there are more women than men, or at least as many, and there are a couple thousand members in Jamaica.
- The church is very strict about fornication, so that until the -- a man decides to take a wife, he has to remain abstinent. So, that I think that there is a general movement for people to find a wife once they have the stability to do so, and it really evens up the sexual ratios.

Children that are born into the church -- always seems
to be more women born than men in Jamaica, so they also
keep it in balance, in a way.

- Mr. Reilly testified that there were 25,000 members in the
 Ethiopian Zion Coptic Church. Now, he didn't break it down
 between the United States and Jamaica. Would that be an
 overestimate of both churches or approximately accurate?
- A. I would frankly say that that was an overestimate.

 It is probably an estimate that many of the church members

 would give, but it's -- and it's very difficult to estimate,

 certainly difficult to estimate. I would say that's an

- underestimate for the Rastafarian movement and perhaps an overestimate for this particular sect.
 - Q. Would the couple thousand members you previously indicated be more accurate?
 - A. Well, according to me it would be more accurate.
 - Q Would the persons in charge of the church tend to be predominantly men?
- A. Always would be men.
- o Q In your study did you have an opportunity to examine the internal financial management of the church in Miami?
- A. No, I didn't. That really was not my charge. I was more interested in whether this church actually fell -fell into the definition of religion.
 - Q Did you have an opportunity to study -- I believe you referred to the growing of natural herbs and things with natural fertilizer. Do they grow their own Ganja?
 - A. They used to. They used to plant a good deal of Ganja on their property in Jamaica but they were continually being raided by police so that they stopped growing it there and now purchase the marijuana which they smoke from small farmers in the area.
 - Q Would those small farmers use the same kinds of natural fertilizer and perhaps primitive agricultural techniques?
- 25 A. Definitely.

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- Do the priests in the church have any particular life style or vow of poverty?
- A. No, not at all. They have -- certainly have a kind of life style, but not the vows of poverty.
 - Q. What would the role, for example, of a Cadillac or a Mercedes-Benz have in the life of a priest?

they would consider that as priests, or for anyone, actually, that every person deserves the very best that they can get.

And, in fact, I raised that question with one brother and he said, given the way that Babylons — that's us — and all the dead spirits operate and the consumption of dead spirits — that's alcohol — that one needs the safest, best car that one can — can have.

- Q. You have seen priests in Mercedes-Benz and Cadillacs?
- A. I have seen priests with Mercedes-Benzes. I have never seen one with a Cadillac.
 - Q. What role does cash play in the church?
- A. Well, the church is an entirely cash-run organization. Again, they do not subscribe to the institutions of
 Babylon; that is, banks and mortgages and so forth, although
 they do recognize that on certain occasions they have to use
 these just for practicality. But in Jamaica, and I believe
 here as well, it's a completely cash-operated church.

- Q Did you have any opportunity to observe any cash being passed between any of the hierarchy of the church and any of the priests of the church?
 - A. The hierarchy of the church and the priests?
 - Q. For example, if a priest were going on a trip, would there be, let's say, an allowance given to the priest for the trip?
 - A. That's quite likely. I have not only seen cash passed from, say, the elders -- and this -- this amount of cash or the goods that are transferred are not the decision of one elder, but in a council of priests. People they -- the priests decide how much an individual is to have, what kind of car they are to have. But all of the remains, even the automobiles and the houses, at least in Jamaica -- those are the ones I know about -- remain with the property of the church.
 - Q Do you understand, though, that the automobiles are actually titled to the individual priests and not to the church?
 - A. Uh-huh. That may be true, but it's not true in Jamaica. I don't know about the United States.
 - MR. PETERSEN: No further questions.
 - MR. COOK: I have a few more questions.

REDIRECT EXAMINATION

BY MR. COOK:

Q Dr. Dreher, you said that there is no specific

I vow of poverty by the priests of this church, and later you 2 testified that such personal items as cash, cars, et cetera, Is there a novelty there? remain the property of the church. Does a priest own anything that you are aware of?

I think priests do own things, but -- and are permitted to own things. They may own things before they come to the church. But for the most part, the goods are

passed to other members and one has to warrant them or merit

them, and they remain property of the church, but it's --

it's quite likely that titles are individually held. 10

Certainly the property in Miami was individually held. 11

Dr. Dreher, when you speak of this organization Q. 12 being a cash organization, in your own mind, does that have 13 anything to do with the makeup of the leaders of the church 14

in Jamaica? 15

Well, I -- actually, I think that's the reason 16 it's a cash operation. The elders in Jamaica are, for the 17 most part, illiterate. They came from the rural Jamaican 18 country side. They have not been schooled, although they are 19 very bright and they know a lot about -- certainly, how to 20 make change, so that they deal in what they know. They 21 certainly can't write checks or sign mortgages or do all 22 those other things, or certainly read a mortgage, so that they 23 prefer to, and do, deal in cash, but that's not unusual 24 That's typical of other groups of churches as well. Jamaica. 25

Has this use of cash and this distrust of society's 1 institutions, such as banks, become a part of the doctrine 2 of this church? I believe it's been incorporated into the doctrine, A. .: so it's like any religion; there is a relationship -- an ongoing relationship between the religion's relationship to society and its doctrine. I have no further guestions. MR. COOK: 8 MR. PETERSEN: No recross. 9 THE COURT: You are excused. Thank you, ma'am. 10 1' Do you have any more witnesses? MR. COOK: We would ask that the Defendant be. 12 sworn, Your Honor. 13 CARL E. OLSEN, 14 called as a witness in his own behalf, after being first 15 duly sworn by the Court, was examined and testified as 16 follows: 17 DIRECT EXAMINATION 13 BY MR. COOK: 19 Mr. Olsen, would you please state your name and 20 address and occupation for the Court. 21 Carl Eric Olsen, and my address is 43 Star Island --22 and my age, did you say? 23 a Yes. 24 Thirty years old. 25 Α.