

Children's Healthcare Is a Legal Duty, Inc.

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Equal rights for children under the law



Frank Harvey

Victory in Tennessee Justice for Jessica at last

Our long and arduous struggle for equal protection of Tennessee children won final victory in April.

The discrimination began in 1994 when the Christian Science church seized the opportunity to promote a religious exception to child abuse, neglect, and endangerment and aggravated child abuse, neglect, and endangerment. Tennessee had never had a religious exemption to child neglect in the civil code but in 1994 a floor amendment was introduced to enact a religious exception to felony crimes against children.

As a floor amendment it was not discussed in committee. No public hearings were held on it. The sponsor didn't even have it at his desk when it was put on the Senate floor. He just told his colleagues, "The amendment was offered by the Christian Scientists saying that it ensures that they're protected. I don't have the amendment in front of me, but it was offered by that group, and

that is the reason that I put it in." The amendment passed by voice vote.

Later the same day the House sponsor told his colleagues that the amendment "is relative to the Christian Science religion, uh, which I have no objection to." It passed by 94-0.

Thus, with no debate, discussion, or consideration for the welfare of children whatsoever, Tennessee enacted a law allowing parents who "[provide] treatment by spiritual means through prayer alone in accordance with the tenets and practices of a recognized church or religious denomination by a duly accredited practitioner thereof" to abuse, neglect, and endanger their children. The crime included acts that result "in serious bodily injury to the child" and acts that are "especially heinous, atrocious or cruel" or involve torture of the child. Tenn. Code 39-15-402(c)

Fast forward to 2002 when Lenoir City teen Jessica Crank developed severe pain in her shoulder. Her mother Jacqueline and "spiritual father" Ariel Ben Sherman took her to a chiropractor, who took an x-ray and advised the adults to take the girl to a hospital immediately. Later the same day Sherman called the chiropractor and reported that they would instead take Jessica to a doctor in Boston.

However, Crank and Sherman instead kept the girl at home and relied only on prayer and ritual. Sherman had had ministries in many states and certificates of ordination from mail-order services. His followers called him "Ariel Christ" or "Lord Ariel Christ."

Crank affiliated with him in Oregon where he and his followers lived together in the Good Shepherd Tabernacle commune.

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In May Crank took her daughter to a walk-in medical clinic. Another x-ray was taken showing bone disintegration. She was again advised to take Jessica to the hospital immediately. The Cranks left without waiting for the paperwork and did not go to the hospital.

The clinic notified law enforcement, but Mrs. Crank had given them false contact information in Oregon, and it took a month for Tennessee law enforcement to locate the child.

Jessica was then hospitalized under court order and eventually released to her mother with hospice care. She died of Ewing's sarcoma at fifteen years old in September 2002.

13 years of litigation: elephant in room

Crank and Sherman were charged with aggravated child neglect in 2002. In the ensuing 13 years the case went up and down through the court system. There were battles over whether Sherman had a legal duty to care for Jessica. The defense argued that the neglect of Jessica was not in a continuing pattern as the statute required. One court reduced the charge from a felony to a misdemeanor. Another court dismissed the charges because in 2005 the legislature had changed the criminal neglect law to protect only children under 13 years old. Loudoun County Deputy District Attorney General Frank Harvey managed to get most charges reinstated, and the legislature even reinstated protection from neglect to children up to 18 years old.

Always, however, "the elephant in the room," as one court put it, was religion. There were high piles of briefing on the meaning of Tennessee's religious exception and whether or not Crank and Sherman were entitled to use it. They claimed the exception violated their constitutional rights to due process and fair notice.

Attorney General: law unconstitutional

Braden Boucek, an Assistant Attorney General, sent Harvey a memo advising him that the religious exception was "unconstitutional as a violation of the Establishment Clause, Free Exercise Clause, and on the grounds of vagueness."

It violates the Establishment Clause, he explained, because it prefers one religion over another and violates the Free Exercise clause because it is not neutral on religion and regulates practices on the basis of "their religious motivation."

Boucek also wrote that the religious exception was unconstitutionally vague in privileging a "recognized church." There is no "case law, statutory guidance or even consensus among citizens" about which churches are recognized, he said.

He recommended that Harvey dismiss the neglect charges and instead file charges for second-degree murder, which has no exception for spiritual treatment.

Harvey decided against charging homicide because he could not prove that optimal medical treatment would have saved Jessica's life.

Harvey talked to the Attorney General's office and believed he had a verbal commitment from them that they would argue the statute was unconstitutional on appeal. With both the defense and the state arguing against the statute, surely the court would rule the law unconstitutional and an appellate ruling would be valid for the whole state.

That would also mean charges would be dropped against the defendants but Harvey felt that invalidating the statute would protect children throughout the state and would be a much better memorial for Jessica than a conviction of her mother and pastor.

Hope for court ruling

With the hope for a ruling against the statute, Harvey hung on to the case like a pit bull. He stuffed four bankers' boxes full with briefs, motions, and opinions. In 2012 Sherman and Crank were convicted of misdemeanor neglect and sentenced to a year of unsupervised probation.

They appealed and again argued that the religious exception violated the Establishment Clause, was unconstitutionally vague, and was therefore violating their due process/fair notice rights.

CHILD filed an amicus brief urging the Court of Criminal Appeals to rule the religious exception unconstitutional.

Attorney General breaks a promise

To our dismay the Attorney General's office defended the statute. They argued that it was not vague but pointedly avoided mentioning whether it violated the Establishment Clause.

The Court upheld Crank's conviction and declined to rule on the constitutional issues, concluding they were irrelevant. Even if the exemption is unconstitutional, the Court said, Crank was appropriately convicted under the other sections of the child abuse statute.

CHILD files second amicus brief

Sherman died before the court ruling came down, but Crank appealed to the Tennessee Supreme Court. Again, CHILD filed an amicus brief urging the High Court to rule the religious exception unconstitutional, not only on Establishment Clause, Free Exercise violation, and vagueness grounds but also because it violated the Fourteenth Amendment rights of children to equal protection of the law.

The Attorney General told Harvey his office would not argue for overturning a criminal conviction. Harvey asked if he could handle the appeal and argue the unconstitutionality of the statute. But the Attorney General refused and again argued in briefing that the statute was not vague and again avoided mention of the Establishment Clause.

Supreme Court: law only for a few churches

Our amicus briefs were co-signed by distinguished Tennessee and national organizations but the Supreme Court did not even mention them. The Court upheld the mother's conviction and found the meaning of the statute adequately clear in that it was "effectively limited to members of religious groups that closely resemble the Christian Science Church." In other words Mrs. Crank had notice that her faith did not qualify for the religious exception.

The Court mentioned the Establishment Clause only in a footnote saying it "gives us pause."

Last hope: legislation; CHILD hires lobbyist

Thirteen years after Jessica died, we were left with only a legislative remedy. CHILD retained Christopher Ford to lobby for repeal of the religious exception. He has a degree from Harvard and has been a Methodist pastor. A lifelong Tennessean, Chris has lobbied at the statehouse for ten years and is respected on both sides of the aisle.

He made trips around the state last fall to meet with legislators and assess their feelings about repeal. He got distinguished Republican legislators to sponsor the bill—Richard Briggs in the Senate and Andy Farmer in the House (SB1761/HB2043). Dr.

Briggs is a trauma surgeon who has served tours of duty in Iraq, Afghanistan, and Somalia. Farmer is a criminal defense attorney.

Chris cared deeply about protecting children from harm. He read *The Last Strawberry*, my memoir about the loss of our son Matthew, and kept it by his bed.

In January I made my first trip to Nashville to work for our bills. Chris arranged 14 appointments for me with individual legislators. Several quickly said they would vote for the bill. It helped that our bills were very simple—they repealed only the one-sentence religious exception.

In the capitol hallway at a Democrat's door was a life-sized Grim Reaper pointing out the deaths that could be predicted from the legislature's failure to expand Medicaid. The Republican Governor Bill Haslam had urged them to do so, but the legislature with its super-majority of Republicans (more than 75% in each chamber) had refused.



Sen. Richard Briggs, M.D.

Nevertheless, I found the Republican legislators almost to a person good listeners and understanding the importance of all parents having a legal duty to provide children with necessities of life.

Senator Briggs, M.D., got the bill passed unanimously in committee and on the Senate floor.

Two Christian Science healers ("practitioners" in church parlance) from Knoxville, Sharon Howell and Debra Chew, came to the capitol and met with legislators, I was told. Howell had written a column for a *New York Times* online forum in which she argued that parents should be allowed to rely exclusively on Christian Science for serious diseases of children and claimed a spiritual healing of a cut on her foot. Chew serves as the church's Tennessee manager of lobbying and public relations.

Legislators told Chris they could not understand the women's position or their religion. Then Ken Bemis, general counsel for Christian Science

headquarters in Boston, came down. He and Chew met with Chris and legislators a number of times.

No accountability for prayer practitioners

Bemis said the church “expects” its parents to know when a child needs medical care and to get it. Chris asked him repeatedly if the church also expects its prayer practitioners to know when a child should be taken to a doctor and if they, like parents, had any responsibility toward the child. Bemis would not answer.

Bemis also asked to meet with attorneys to discuss the church’s proposal for statutes. Frank and his successor, Tiffany Smith, met with Bemis, Chew, Chris, and me. Bemis said the church did not oppose our bill but would openly support it if we would agree to add a religious exemption to neglect in the civil code (which Tennessee has never had) and to contributing to dependency.

Bemis said their only motive for these new exemptions was to protect Christian Scientists from “presumptive bias.” Their proposal was titled “An Improved Standard of Caring for Children in Tennessee.” Bemis said he was a fifth generation Christian Scientist and had been healed by the religion as an infant.

We made no promises and did not need their support. It was, though, very helpful to be able to tell legislators that no organization opposed the bill.

Later Frank and I met Debra Chew at a House subcommittee hearing. She was interesting. She said she wanted the religious exception repealed because irresponsible parents in other religions cause confusion with Christian Science to the public. She said the church had asked her to join a child welfare organization so she joined the Tennessee Commission on Children and Youth. She tells Christian Scientists in Tennessee to take sick children to doctors and will report them to state child protection services if they don’t. Departing from traditional Christian Science practice, she takes her own children for routine and urgent medical care.

Slippery slope argument

Representative Tilman Goins, R-Morristown, was our only vocal opponent. Before the subcommittee hearing he had ordered Chris to get out of his office, and at the hearing he launched an astonishingly personal attack on Chris. Goins argued that a law’s being unconstitutional was no reason to repeal it. The U.S. Supreme Court legalized gay marriage

yet Tennessee has made no move to repeal state laws outlawing it, he pointed out.

Tennessee has a lot of unconstitutional laws on our books that we don’t repeal, he continued, “And I think the only reason this bill is before us today is that some lobbyist thought he could make a lot of money and went trolling for a client.”

He further said that the lobbyist was patronizing to him and he had forbidden the lobbyist to ever come in his office again and would never vote for a bill that lobbyist works on.

He closed with the slippery slope argument and tied our bill to gay rights. The rapid advance of gay rights has been very surprising and if we pass this bill, in five years the government might deprive the Amish of their religious exemption from buying health insurance, he warned.



Rep. Andy Farmer

We heard no more from him as the bill moved to the full committee and then the floor. Goins was the only legislator in either chamber to vote against it. Governor Haslam signed the bill into law.

We are very grateful for support by the Tennessee Medical Association, Tennessee Chapter of the American Academy of Pediatrics, and Prevent Child Abuse Tennessee. Doctors promoted our bill to individual legislators on their lobby days. One who treats a Senator’s children persuaded the Senator to support the bill.

We’re especially grateful to Frank Harvey, who, like me, made four trips to Nashville to lobby for repeal. He was determined to have policy progress come from Jessica Crank’s death—change that the courts refused to grant. At first he feared legislators would not listen to him because he is a well-known Democrat in a very Republican area. Chris and I implored him to get involved, and of course he was very effective testifying about his 13-year work on the Crank case, which, he said, “lasted nearly half of my prosecutorial career.” A legislator called him “the hardest working prosecutor in eastern Tennessee.”

The pediatrics chapter has named Representative Farmer as its legislator of the year.

Challenges persist despite church passivity

The Christian Science church has now been neutral on several repeal bills in recent years—in Oregon, California, Tennessee, and Idaho for example. They still want recognition of their spiritual treatments as one more alternative medicine in a New Age smorgasbord, which may be a strategy for protecting their practitioners, who bill for their prayers and want to function as health care providers but take no responsibility for what happens to their patients. But the church, from our observation, is no longer fighting for exemptions from criminal liability of parents.

Even with the church's neutrality our bill could have become hopelessly mired in election-year politics without Chris's leadership and meticulous work. There were several bills introduced to expand religious liberty in reaction to the U.S. Supreme Court's ruling on gay marriage and long, contentious floor debates on them.

Furthermore, Tennessee legislators also enacted a bill this year that gives a religious exemption from prophylactic eye drops for newborns (SB2371/HB2412). We did not learn of it in time and it was likely a wise strategy for us to focus only on getting that one sentence in the criminal code repealed that allowed such serious harms to children.

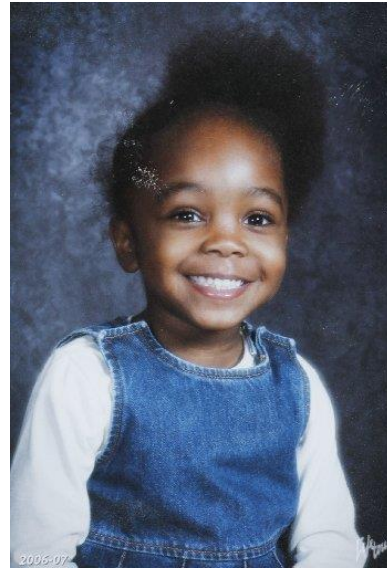
It still seems that religious exemptions do not get repealed or even blocked unless CHILD is involved. We are nevertheless celebrating the successful conclusion of a long struggle in Tennessee for laws that require all parents to get medical care for sick and injured children.

New Jersey mom convicted in daughter's death; defense claims cultic control

In March Krisla Rezureksyon Kris of Irvington, New Jersey, was convicted of aggravated manslaughter, aggravated assault, and child endangerment in the death of her 8-year-old daughter Christiana Glenn and injuries to her other children though her attorney claimed she was under the delusional spell of a cult leader. ("Rezureksyon" is pronounced "Resurrection.")

The mother became a follower of a Haitian baker-cum-pastor, Rezureksyon Kris, and changed

her name to incorporate his. She acquired an equally devout roommate, Myriam Janvier. The two of them created a totally white apartment and dressed themselves and Krisla's three children in white robes. The pastor conducted near-daily religious services in their home. Hours of frenzied chanting were often heard from the apartment.



Christiana Glenn in happier days before her mom's conversion

Toys were prohibited as idols. The children almost never went outside and were forbidden to play. They slept on the floor.

The children were hit with hands and implements. They were also punished by being forced to kneel on stove grates or salt while holding books over their heads for long periods of time.

The women were forbidden to work or have cell phones. They cut off contact with relatives. They often left home for hours. They tied the children to a radiator in a lightless pantry and left a bucket for their toilet needs while they were gone.

Fasting was a religious obligation. In 2009 Christiana told a counsellor that the children often got nothing to eat for days and usually had only soup and crackers when they were fed.

By 2011, the year Christiana died of malnutrition and medical neglect, the children were so weak that their bones broke. When they were unable to walk, Rezureksyon and Janvier dragged them across the floor. Following the pastor's recommendation of "natural" remedies, the women put cornmeal, gasoline, and salt on Christiana's swollen leg but got no medical care.

Viewing the child's eight-year-old body, the medical examiner wept for the first time in his career. He said the femur is the strongest bone in the body and yet hers was broken in two places and might have broken just because of being so brittle from starvation.

Was mother brainwashed?

Rezireksyon's attorney told the press the pastor had cast "a delusional spell" over her and brought in clinical neuropsychologist Dr. Joel Morgan, who testified that the mother belonged to a religious cult and had been brainwashed by her pastor. He linked her religiosity to her low IQ and called the pastor "a pathological narcissist preying on vulnerable people."

Essex County Superior Court Judge Michael Ravin prohibited the testimony, calling those assertions speculative and beyond the neuropsychologist's expertise. Morgan did not define "cult" and offered only the mother's low IQ and symptoms of depression as evidence she had been brainwashed, Ravin wrote. He also disallowed psychological characterization of the pastor because Morgan had not interviewed him.

The judge did allow testimony on Rezireksyon's religious beliefs, her IQ, and diminished mental capacity, which Morgan said prevented her from forming a knowing mental state. Morgan interviewed her for several hours in jail.

Doctors are "work of the devil"

She felt she was a sinner in need of redemption, Morgan told the jury. She believed doctors, hospitals, and drugs were "the work of the devil" and used "home remedies" instead, he said.

Though not allowed to claim the pastor "brainwashed" her, Morgan testified that the pastor strongly influenced her. "She adopted his way of life. She became a zealot and empowered him with having judgment over her and her children in terms of daily activities, prayer, diet, medical health, everything," he said. She gave all her money to him.

From tests he gave her, Morgan determined her IQ was only 67, or "mildly mentally retarded," which along with psychic disorders he found made her "easily exploitable."

Mother had ability to make own decisions

Prosecutor Dawn Simonetti challenged his diagnosis, offering evidence that before her conversion the mother had worked at a daycare center, had gotten training in child development, was certified in CPR and first aid, and completed courses at a business college, and completed 289 hours of service and training for an externship with a hospital.

Simonetti also pointed out that the pastor did not directly cause the harm to the children and that Rezireksyon and Janvier were not starving themselves. A surviving sibling testified that the pastor treated them nicely.

Simonetti argued that the mother showed a knowing mental state in lying to the police about where her children were. She had the ability to strategize and decide to say what she knew was false.

Her videotaped interview with police the day Christiana died was played to the jury. In it the mother said she was not in a cult or brainwashed but was simply a follower of Christ.

The jury acquitted Krisla Rezireksyon of murder, a crime that does require proof that she acted purposely or knowingly, but convicted her of aggravated manslaughter defined as causing death recklessly "under circumstances manifesting extreme indifference to human life." She will be sentenced in July.

Social services failed girl

The social services network failed Christiana. Four calls were made to New Jersey Children's Services between 2006 and 2008 reporting suspected abuse and neglect of the children. Service workers investigated and concluded there was no abuse or neglect. A fifth call came in nine days before Christiana died in 2011 but the intake worker did not relate it to the previous calls or channel it for investigation. After the girl died, the intake worker was fired.

Christiana had another chance for survival late in 2009 when her godparents Tommie and Mary McCoy became so concerned about her welfare that they petitioned the court for custody. Before the mother's religious conversion, the McCoy's had kept Christiana for weeks at a time and had taken her on family vacations. A court-appointed counsellor interviewed the girl with the McCoy's. Christiana told the counsellor about how little food she was getting, that toys were prohibited as idolatry, and that Pastor Kris taught the children at home. When the counsellor asked her what she did for fun, Christiana sighed and said nothing.

We feel those answers should have aroused the counsellor's concerns enough to ask more questions or call Children's Services. Instead the court denied the McCoy's custody.

Of course, most people in an aberrant, high-demand group deny that they are in a cult or brain-washed so I did not find the mother's denial proof of her ability to act independently. But the prosecution's other evidence does show ability to make decisions. There was also hypocrisy in starving her children when she herself had enough to eat.

Parents should have a legal duty to do everything in their power to safeguard the life of their child. Blame for Christiana's death cannot be transferred to the pastor when the mother was physically, mentally, and psychologically capable of caring for her daughter. We do wonder, though, if the pastor could have been charged with failure to report the abuse and neglect. New Jersey law requires everyone with "reasonable cause to believe a child has been subjected to" abuse or neglect to report. NJ Stat. 9:6-8.10 If he came to their home almost daily for religious services and was instructing the children as has been reported, he would have had a high degree of awareness of what was happening to them.

Sources include many articles from 2011 to the present at www.nj.com.

FGM continues to kill; opposition to procedure increases

In May the death of a 17-year-old Egyptian girl while undergoing a female genital mutilation operation highlighted once again the dangers of FGM. The operation was performed by a registered female doctor in a hospital, which should have made it far safer than the millions of ones done by village women with unsanitary instruments and broken glass in huts. Mayar Mousa nevertheless died.

Egypt banned FGM eight years ago and last year an Egyptian physician Dr. Reslan Fadl was convicted of manslaughter for the death of 13-year-old Sohair Al-Bataa from the procedure.

At least 200 million girls and women alive today have undergone female genital mutilation in 30 countries, UNICEF reported in February.

Is FGM religious or cultural abuse?

The practice is most common in Islamic countries. In Indonesia there are some communities where mass female circumcision ceremonies are

organized by Islamic foundations on the Prophet Muhammed's birthday.

FGM does, however, predate Islam, is not mentioned in the Koran, and is also done among some minority Christian sects, Ethiopian Jews, and some animist African tribes. Prominent Islamic scholars have condemned the practice on theological grounds, e.g. Imad-ad-Dean Ahmad in "Female genital mutilation: an Islamic perspective," a Minaret of Freedom Institute pamphlet.

Comprehensive strategy needed

The UNICEF report indicates slow progress in reducing FGM. It has been banned by law or decree in most of the countries where it occurs, including 25 African countries, but the laws are poorly enforced.

Furthermore, criminalization sometimes leads to making the practice more clandestine and even more dangerous.

Some working to eradicate it say that we will not succeed simply by talking to the young girls. Boys have to be educated too. Grandmothers, who have great authority in many communities, need to be enlisted in the fight.

Both men and girls' parents want girls cut

We also need to understand the cultural pressures that contribute to FGM. When there are political and social upheavals and governments cannot maintain order or provide economic opportunity, families want girls to be married young. FGM, which removes the clitoris, deprives females of sexual pleasure, and thereby purportedly guarantees their premarital virginity, which in turn is necessary to getting husbands to protect them.

The evangelical Christian aid and development organization World Vision reports some success by working with entire village communities to develop alternative "rites of passage," getting endorsements by local politicians, and offering cutters other ways of making a living.

Professor Susan Bennett's book chapter, "Female genital mutilation/cutting," discussing the cultural pressures behind FGM is posted on the CHILD webpage www.childrenshealthcare.org.

Sources include UK newspapers, *The Telegraph*, Jan. 26, 2015 and May 30, 2016, and *The Guardian*, Apr. 15 and July 17, 2014 plus UNICEF report *Female Genital Mutilation/Cutting: a Global Concern*.

New edition of deprogramming classic released

The 25th anniversary edition of Steve Hassan's groundbreaking book *Combating Cult Mind Control* was released in 2015. Hassan has worked fulltime as a counsellor for forty years specializing in helping people break loose from high-control groups. The book describes his non-coercive Strategic Interactive Approach to counseling, which has been widely adopted by clinicians. It also describes how the counsellor can assess a patient's dependence on a leader or a cause. Hassan developed the BITE model, which stands for a group's control of the individual's behavior, intellect, thoughts, and emotions. The book describes how to evaluate each of those facets.

Coming to this book for the first time, I was most moved by the survivor stories—how they got into destructive groups, how they got out, and what they have done with their lives since. Though Steve has told his story many times in national media, I first learned of it through this book. What an intelligent, idealistic person could be made to think, say, and do with only two years in a cult is astonishing.

Strong Jewish family

Steve grew up in a close-knit, loving, devout Jewish family. He was bar-mitzvahed and attended his temple regularly. While in college, however, he was confused about a career path and then became depressed when his long-time girlfriend ended their relationship. Recruiters with Sun Myung Moon's Unification Church approached him on campus and invited him to attend meetings. He was initially told the group had nothing to do with religion and was only promoting world peace and love for all cultures and races. He agreed with their idealistic sentiments and was curious as to why each member looked so happy all the time.

The next time he attended the talk became religious. Steve was confused and told them he didn't plan to come back. But when he got in his car, a dozen people came running out in the icy cold without shoes on, surrounded his car, and said he couldn't leave until he promised to return. Steve agreed because they seemed to care about him so much and he feared they might catch a cold.

When he did return he was the center of their attention and flattery, a practice called love-



bombing by cult critics. He was filled with dread when he got essentially captured at a retreat without his own transportation but one Moonie asked him if he was afraid of being brain-washed, and Steve was sure he could not be.

Afterwards he was physically and emotionally exhausted, he was told he had a special destiny to save the world, and he seized on coincidences as signs that what he was told was true.

His parents begged him not to abandon Judaism, and Steve did not want to either. But Judaism still waits for a messiah and Steve reasoned that if Sun Myung Moon was the Messiah, then he would be fulfilling his Jewish heritage by following him.

Total devotion to Moon

He moved into a Moonie house to study the religion full-time under a charismatic teacher, who became like a surrogate father to him. He donated his bank account to the church, dropped out of college, and cut off ties with his family. The Moonies also demanded that all his creative writing be destroyed including some 400 poems that he had “nurtured” over years as if they were his children.

Soon Steve was in a “high-speed daze of exhaustion, zeal, and emotional overload.” He was successful at fundraising and recruiting. But when he fell asleep at the wheel and crashed into a semi-trailer, he had to recover from a broken leg. The Moonies gave him permission to move in with his sister perhaps because she had not tried to get him out of the group and perhaps because they had no use for him as an invalid and did not want to care for him.

With freedom to rest and read, with his father coming to him in tears, after five days of voluntarily staying in a home where ex-Moonies talked and argued with him, and after slavishly protesting his devotion to Moon even “if Moon is like Hitler,” Steve abandoned his allegiance to the Unification Church.

The other survivor stories in the book are equally impressive. Their former groups includes political, religious, and psychological cults, as well as terrorist and sex trafficking organizations.