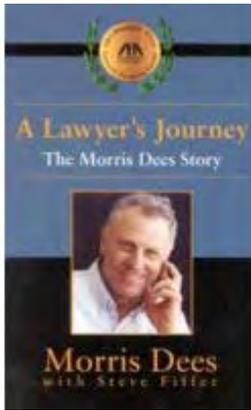


THE TRUTH ABOUT MORRIS DEES AND HIS SOUTHERN POVERTY LAW CENTER

OVERVIEW



*“The fool hath said in his heart, There is no God.”
Psa 14:1*

Morris Dees is a fool. He vainly imagines that by falsely labeling the Church of the Lord Jesus Christ a “hate group” he can shake off the guilt that tortures him due to the righteous preaching against sodomite sins: God hates fags and fag-enablers (Romans 1:26-32). Ergo, God hates Morris Dees and his Southern Poverty Law Center (SPLC).

Based on court records and other publicly available documentation (see herein): Morris Dees is a greedy, money-grubbing, wife-beating, child-abusing, adulterer, abortionist, God-hating, Bible-ignorant, blaspheming sodomite who has been cut to the core by the preaching of Pastor Fred Phelps and Westboro Baptist Church (WBC). In his sick, twisted, perverted mind, and in a vain effort to silence his own conscience – and at the same time toss a sop to the fags and dykes who dominate and live off his misnomered SPLC – Dees has imagined he can find ease by filling cyber space with lies about Pastor Phelps and WBC.

In his campaign of lies and disinformation about Pastor Phelps and WBC, Dees adopts Machiavellian techniques. The technique goes like this: *Two candidates for high office were in a knock-down-drag-out television debate. As the debate drew to a close, one candidate dramatically pointed at the other and said, “My opponent is a cattle rustler.” Later, he was asked: “Why did you say that? You know that’s not true.” He replied: “I know. I just wanted him to have to deny it.”*

Here’s an example of an elaborate scheme by WBC detractors, published by SPLC which led to a fruitless investigation of Pastor Phelps and WBC by the FBI. Although the SPLC promised to remove the lies from its Web site, promised to publish a retraction, and promised to publicly apologize – the lies remain on its website. Some pervert opened a yahoo e-mail account pretending to be Pastor Phelps; to wit: fphelps44@yahoo.com. In SPLC’s *Intelligence Report*” on the Web, SPLC put the following malicious libel against Pastor Phelps:

During the summer, a Jewish Topekan named Lief Dolan sends Phelps an E-mail asking him to stop picketing Dolan's synagogue because "you are scaring my children." The reply from fphelps44@yahoo.com reads: "SHUT UP YOU CHRIST HATING JEW, I WISH HITLER HAD FINISHED THE JOB. ... You and your children had better watch your back when you get out of temple, this is not a threat but a promise." Southern Poverty Law Center Intelligence Report, 2001. <http://www.splcenter.org/intel/intelreport/article.jsp?sid=184>

When the FBI showed up at WBC to interview Pastor Phelps, with a copy of the lie published by SPLC, it became clear SPLC would stop at nothing to silence WBC's gospel message: God hates fags and fag-enablers.

 Southern Poverty Law Center
400 Washington Avenue
Post Office Box 2087
Montgomery, AL 36102-2087

October 26, 2001
Via Facsimile

Mr. Fred Phelps
Westboro Baptist Church
3701 SW 12th Street
Topeka, KA 66604

Dear Mr. Phelps:

We take you at your word when you tell us that you had nothing to do with the message from fphelps44@yahoo.com.

As you know, we took the statements regarding the message down from our web site once we heard from you. We intend to publish a retraction that will not repeat the substance of the message and that states that we previously published a message from the fphelps44@yahoo.com e-mail address in an article about you, that you have informed us that the message was not yours, and that we sincerely regret the error – which we do. This retraction will alert all parties with an interest in the substance of the publication to the error.

I trust that this will resolve the matter. As the final editor for the publication of the Southern Poverty Law Center, this error is ultimately my responsibility. Please accept my apology. In addition, feel free to share this letter with anyone you deem appropriate. Thank you.

Sincerely,

J. Richard Cohen
General Counsel

Ergo, God hates Morris Dees and his Southern Poverty Law Center (SPLC).

When the FBI investigated the matter and understood that Pastor Phelps had absolutely nothing to do with the fag-sponsored "yahoo" account and the lies on SPLC's web site, the FBI apologized and terminated the investigation. Pastor Phelps wrote SPLC and demanded the libel be removed from SPLC's Web site, and that a public retraction and apology be forthcoming. The SPLC agreed in a letter dated October 26, 2001 (see attached).

Four years have gone by, and the libel remains on SPLC's web site. Nor has a public retraction and

apology been issued. This is further evidence that Morris Dees and his fag/dyke money-making machine masquerading as the SPLC are operating with hate-filled malice in defaming Pastor Phelps and WBC.

"He's a fraud who has milked a lot of very wonderful, well-intentioned people," says Stephen Bright of Atlanta's Southern Center for Human Rights. "If it's got headlines, Morris is

there.” Andrea Stone, “Morris Dees: At Center of the Racial Strom,” *USA Today*, August 3, 1996, 7A.

That quote pretty much sums up Morris Dees. Below is more of the sad, sick saga of the aging, hell-bound old whoremongering adulterer and his money-grubbing ways.

MORRIS DEES – “SHOW ME THE MONEY PLEASE”



RNS Photo

The hypocrisy of SPLC and Morris Dees is astonishing. Suffice it to say that “poverty” is not what one thinks when SPLC and Morris Dees come to mind. Try, “filthy rich,” “opulence,” “millionaire,” “excess” and like adjectives. According to SPLC’s website, they have an endowment now in excess of \$136,000,000.

SPLC has enough money in the bank that it could stop fundraising and collecting money right now and have enough revenue to operate for the next five to six years. Here are some financial highlights from SPLC’s IRS Form 990 for the period ending 10/31/2004

(http://www.splcenter.org/pdf/static/SPLC_IRS_990_2003.pdf):

- SPLC’s total gross receipts for the year (page 1, line L), **\$59,737,766.**
- Profit for the year (page 1, Line 18), **\$6,614,362.**
- Total assets (page 3, Line 59), **\$173,185,250.**
- Morris Dees’ annual compensation (page 4, Part V), **\$295,718.**
- Director of Membership’s compensation (page 7), **\$112,566.**
- Fundraising/direct marketing consultant costs (page 7, Part II), **\$331,305.**
- Total endowment assets:

Cash	\$ 351,902
Equity Investments	\$105,699,938
Fixed Income Investments	\$ 30,474,371
TOTAL	\$136,526,211

For the period ending 10/31/2004, the SPLC banked another \$6,614,362 in profit. Oh, “non-profits” cannot have profit... let’s restate it, \$6,614,362 in excess revenue over expense. Total assets for the SPLC were \$173,185,250... My goodness, if Mr. Dees continues at this rate, he’ll soon have a quarter of a billion dollars for this “non-profit” for the impoverished. Mr. Dees is well compensated at just shy of \$300,000 annually. I wonder how many of his impoverished clients make this much? How about... zero! And, why would a non-profit legal clinic need a Director of Membership at \$100,000+ and marketing consultant costing over \$300,000 annually? One word... fundraising. It must be nice to have a portfolio worth more than \$136,000,000 and growing.

Here are a few quotes from publications on SPLC’s/Dees obsession with money:

- *“Today, the SPLC spends most of its time – and money – on a relentless fund-raising campaign, peddling memberships in the church of tolerance with all the zeal of a circuit rider passing the collection plate.” Harper’s Magazine, November 2000.*
- *“Morris Dees-who made millions hawking, by direct mail, such humble commodities as birthday cakes, cookbooks (including Favorite Recipes of American Home Economics Teachers), tractor seat cushions, rat poison, and, in exchange for a mailing list containing 700,000 names, presidential candidate George McGovern-is nothing if not a good salesman. So good in fact that in 1998 the Direct Marketing Association inducted him into its Hall of Fame. "I learned everything I know about hustling from the Baptist Church," Dees has said. "Spending Sundays on those hard benches listening to the preacher pitch salvation-why, it was like getting a Ph.D. in selling."” Harper’s Magazine, November 2000. It’s pretty clear Mr. Dees didn’t learn anything else from those Sundays.*
- *Dees acted as Chief fundraiser for George McGovern's 1972 presidential campaign in return for the campaign's mailing list. He raised \$20 million for McGovern. [Burlington Times, July 30, 1975. The Progressive, July 1988.]*
- *Morris Dees doesn't need your financial support. The SPLC is already the wealthiest civil rights group in America... Back in 1978, when the Center had less than \$10 million, Dees promised that his organization would quit fund-raising and live off interest as soon as its endowment hit \$55 million. But as it approached that figure, the SPLC upped the bar to \$100 million, a sum that, one 1989 newsletter promised, would allow the Center "to*

cease the costly and often unreliable task of fund raising." *Harper's Magazine*, November 2000.

- *"Dees is the classic example of an opportunist waging a holy war against unpopular foes and profiting from it, both financially and ideologically. His primary talents have always been in the area of fundraising and promotion." The Watchdogs, 2nd Ed., Laird Wilcox, 1999, 50.*
- *According to Millard Farmer, the Center largely stopped taking death-penalty cases for fear that too visible an opposition to capital punishment would scare off potential contributors. In 1986, the Center's entire legal staff quit in protest of Dees's refusal to address issues-such as homelessness, voter registration, and affirmative action-that they considered far more pertinent to poor minorities, if far less marketable to affluent benefactors, than fighting the KKK. Harper's Magazine, November 2000.*
- *"What is the Southern Poverty Law Center doing...? Mostly making money...In 1999 it spent \$2.4 million on litigation and \$5.7 million on fundraising, meanwhile taking in more than \$44 million--\$27 million from fundraising, the rest from investments...On the subject of 'hate groups' ...No one has been more assiduous in inflating the profile of such groups than the center's millionaire huckster, Morris Dees, who in 1999 began a begging letter, 'Dear Friend, The danger presented by the Klan is greater now than at any time in the past ten years.'...With...a salary close to \$300,000 putting him among the top 2 percent of Americans, Dees needn't worry about 'fitting in' with the masses of Montgomery [SPLC headquarters]. Naturally, he'd erect a multimillion-dollar office building that's a monstrosity." [JoAnn Wypijewski in *The Nation*, February 26, 2001, as quoted in *FrontPage Magazine*.]*
- *In the early 1960s, Morris Dees sat on the sidelines honing his direct-marketing skills and practicing law while the civil rights movement engulfed the South. "Morris and I...shared the overriding purpose of making a pile of money," recalls Dees's business partner, a lawyer named Millard Fuller (not to be confused with Millard Farmer). "We were not particular about how we did it; we just wanted to be independently rich." Harper's Magazine, November 2000.*
- **Dees bought a 200-acre estate appointed with tennis courts, a pool, and stables**, and, in 1971, founded the SPLC, where his compensation has risen in proportion to fund-raising revenues, from nothing in the early seventies to \$273,000 last year (1999). *Harper's Magazine*, November 2000.

- *"You are a fraud and a conman," the Southern Center's director, Stephen Bright, wrote in a 1996 letter to Dees, and proceeded to list his many reasons for thinking so, which included "your failure to respond to the most desperate needs of the poor and powerless despite your millions upon millions, your fund-raising techniques, the fact that you spend so much, accomplish so little, and promote yourself so shamelessly." Harper's Magazine, November 2000.*

THE "POVERTY PALACE" – MORE OPULENCE



Media sources pejoratively dub the SPLC's building in downtown Montgomery, Alabama as the "Poverty Palace." The building has been the subject of architectural awards and it should be. SPLC's IRS forms show its "Land, buildings, and equipment" at \$24,799,159 (see Form 990, page 3, Line 57a). So, why does a "non-profit" law center/legal clinic dedicated to poverty need a nearly \$25,000,000 building? When you find an answer let us know. We can't think of one. On the other hand, if you have \$136,000,000+ earning interest annually in an investment portfolio and you are banking another \$6,000,000+ in profit a year... why not? To top it off the SPLC opened a new \$5.5 million Civil Rights Memorial Center in October 2005 complete with a "Wall of Tolerance." Oh, how the money flows.

crime” with direct-mail alarms full of nightmarish invocations of ‘armed Klan paramilitary forces’ and ‘violent neo-Nazi extremists’...” Harper’s Magazine, November 2000.

- *“There are many cases in my files where organizations targeted by the SPLC strongly dispute the characterizations of them that have appeared in SPLC publications. ...The SPLC has been caught in so many exaggerations and misrepresentations that one must concede that their own record in this regard is poor.” The Watchdogs, 2nd Ed., Laird Wilcox, 1999, p. 55.*
- *“For 15 years, people throughout the country have sent millions to the (SPLC) to fight the Ku Klux Klan and other supremacists. But critics say the law center exaggerates the threat of hate groups...” Greg Jaffe and Dan Morse, “Rising Fortunes: Morris Dees and the Southern Poverty Law Center,” Montgomery Advertiser, November 1990.*
- *“He’s [Dees] not immoral, he’s amoral...I hesitate to say the words that I want to say because they sound so far out, but I really think the Center – in so far as Morris embodies the Center – is evil...They pretend to be on the side that has moral underpinnings (but) they do damage by their dishonesty.” Dan Morse, “Marketing the Klan,” Montgomery Advertiser, November 1994.*

MORRIS DEES – “SHOW ME THE WOMEN (AND MEN) PLEASE”



So how does Morris Dees live his own life? And, does this shed any light on why he so strongly dislikes WBC even though many of the members of the church are attorneys having effectively fought racism (including Pastor Phelps who – unlike Mr. Dees – did not sit the 1960’s out on the sidelines). Below are some highlights. Most of the quotes are from the Brief of Appellant in Dees 1979 divorce to Maurene Bass Dees, see <http://www.zianet.com/wblase/endtimes/dees1.htm>.

The story told in the Brief of Appellant includes adultery, abortion, wife swapping, incest, alleged homosexual behavior, battery, lies, deceit and more. Surely, this is included in Dees’ autobiography – not. It reads like something out of a tacky movie. In fact, I don’t know if anyone could make this up. And this is the character of the man that founded the SPLC.

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IN THE ALABAMA COURT OF CIVIL APPEALS

MAUREENE BASS DEES      )
    Appellant,         )
    -vs-                ) CASE NO. CIV. 2114
MORRIS S. DEES,         )
    Appellee.          )

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ON APPEAL FROM THE CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA

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BRIEF OF APPELLANT

-----

                                MAURY SMITH
                                JULIA S. WATERS
                                CHARLES M. CROOK
                                Attorneys for the
                                Appellant

OF COUNSEL:
SMITH, BOWMAN, THAGARD,
CROOK & CULPEPPER
P.O. Box 78
Montgomery, Al 36101
Telephone: (205) 834-6500

ORAL ARGUMENT REQUESTED
    
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- Morris Dees has been married four times. *The Watchdogs, 2nd Ed.*, Laird Wilcox, 1999, p. 58.

From the Brief of Appellant in Dees’ 1979 divorce action filed by Maurene Bass Dees, see <http://www.zianet.com/wblase/endtimes/dees1.htm>.

- *“The Cause of the Break-Up: Vicki Booker McGaha –*

Although Maureene was subjected to a number of degrading sexual episodes by Morris during the marriage which will be discussed hereafter, neither Morris nor Maureene ever wanted or sought a divorce until Morris established his permanent relationship with Vicki Booker McGaha in August of 1977. It was Morris’ absolute refusal to give up his mistress, whom he was supporting and whom he had made pregnant, that

directly caused termination of Maureene's marriage and forced her to institute these divorce proceedings. In August, 1977, Morris tried the "Weisenhunt case" in Birmingham, and became acquainted with Vicki Booker McGaha, who was a member of that jury (R. 1459). Thereafter, Morris and Vicki began a sexual affair which has still not ended, and which was the cause of termination of two marriages. *Dees v. Dees, Brief of Appellant, Case No. 2114, page 7.*

Maureene first found out about Vicki when she was contacted by Vicki's husband, who subsequently turned over to her letters that Morris had written to Vicki and tape recordings of conversations that Morris had had with Vicki (R. 361-362). Mr. McGaha divorced Vicki McGaha in May, 1978 (R. 1469). Around this time, at Morris' request, Maureene met with Morris and Vicki at the Sheraton Mountain Brook Inn to discuss the situation (R. 358). During this conversation Morris told Maureene that he was in love with Vicki, that they wanted to be together, and they didn't care if they had anything but a shack with a dirt floor if they could be together (R. 358). *Dees v. Dees, Brief of Appellant, Case No. 2114, page 7.*

After Maureene and Morris had been separated for about four to six weeks, Morris telephoned her and said that he had made a mistake, that he did love Maureene and wanted her back, and he swore never to see Vicki McGaha again (R. 282). To assure her of this Morris arranged another meeting among the three of them at Joe Levin's lake cabin on July 3, 1978 (R. 367, et seq). This meeting was bizarre. In a three-way conversation Morris would first ask Vicki to state how much she loved him, and he would then turn to Maureene to ask her to state how much she loved him (R. 367). It was as if he were staging a contest to see who loved him the most, or who would do the most for him (R. 367). *Dees v. Dees, Brief of Appellant, Case No. 2114, page 7.*

Morris admits to having provided the following support to Vicki during the eleven-month period from May, 1978 through March, 1979 (R. 1504, et seq):

May 30, 1978	\$1,500
June 6, 1978	500
June 22, 1978	1,500
July 6, 1978	1,000 (after "reconciling" with
July 30, 1978	1,500 Maureene July 3rd)
Aug. 26, 1978	1,500
Aug. 27, 1978	1,625
Sept. 20, 1978	1,500
Nov. 27, 1978	5,000
Jan. 25, 1979	5,000
March, 1979	2,000
Total	\$22,625

In November, 1978, Morris finally admitted to Maureene that, notwithstanding the promises that he had made in July to abandon Vicki and reconcile with Maureene, he had continued to see Vicki in Birmingham, that she was then five months pregnant with his child, and that he would be going to Birmingham in a few days to be with her while she had an abortion which Morris was paying for (R. 364). Over the next sixty days, Maureene concluded that she simply could not accept the situation any longer. It was apparent to Maureene that Morris was not going to stop seeing Vicki, and Maureene was not willing to live in a situation where she knew for a fact that her husband really had, in effect, two wives (R. 412). Morris was supporting Vicki and had been doing so for almost a year. He treated Vicki like a wife, supplying all of her financial and emotional needs. He was there when she needed him. He was spending almost half a week going back and forth to Birmingham two or three times a week, attempting to divide his time between them (R. 412). Dees v. Dees, Brief of Appellant, Case No. 2114, page 9.

In February, 1979, Morris Dees realized that he was in a precarious legal position. He had been conducting an affair with Vicki McGaha for almost two years; she had become pregnant by him and had received an abortion which he had paid for; he was supporting her and spending most of his time with her and planned to continue to do so; and Maureene, who was fully aware of all of these facts, and stated that she could not tolerate the situation any more and was leaving him to institute divorce proceedings. To protect himself in the impending litigation, Morris had to find a way to neutralize Maureene. In February, 1979, after Maureene informed Morris that she was leaving him, Morris wrote out an agreement, which he showed to her on a Sunday afternoon, and asked her to stay and live by this agreement (R. 385). This agreement, identified and introduced as Plaintiff's Exhibit 30, purported to permit the parties to lead separate lives but stay married, and provided that they would not hold anything against each other that had happened either before or after the date of the agreement (R. 386). The first such purported agreement (Pl. Ex. 30) provided in part as follows:

"Whereas they (Morris and Maureene) feel that they can better work toward a more complete and satisfying relationship in their marriage if they have an open marriage, i.e., where each party, while still living together as man and wife, be free to have relationships with the opposite sex, which said relationships may consist of sexual intercourse. . ."

During the time that he was discussing this agreement and urging her to sign it, Morris continued to tell Maureene that he loved her and that he had stopped seeing Vicki (R. 390), which was another lie. Plaintiff's Exhibit 31 is another agreement which Morris drafted because he did not like the language of the first agreement..

[Testimony of Morris Dees]

A. *Prior to even drawing up these agreements, I agreed to it orally. I have already said that . . .*

Q. *When did you first orally agree that your wife, your lawful wife, could have sexual intercourse with other people?*

A. *About a day before this agreement was drawn up.*

Q. *This was some time in February?*

A. *Yes*

Q. *And it was one day preceeding the first agreement?*

A. *Approximately."*

(At page 253)

"Q. You knew she (Maureene) knew about you and Vicki?

A. About the abortion, and she said, I am going to use that and I said, Maureene, look if you have somebody you want to have sex with, go ahead and have sex with them. We said that that night at the bar.

Q. That was clear and unmistakable?

A. Clear and unmistakable.

Q. You encouraged her to and if there was anybody --

A. If you call that encouragement --

Dees v. Dees, Brief of Appellant, Case No. 2114, page 10, 12.

Morris' Trap Works: The Hotel Room Agreement

On March 4, 1979, Maureene walked naively into the trap which Morris had set. On that date, she flew to Washington, D.C., where she met Brian O'Daugherty (R. 576). Maureene knew Mr. O'Daugherty in connection with her work on the National Endowment, and he was the Director of the Media Arts Program (R. 341). Morris had told her that she could see anyone she wanted, as long as she was discreet (R. 578), and her flight to Washington was booked under the name of Betty Foster (R. 576). Maureene and O'Daugherty had dinner together on the night of March 4th, and returned to her hotel room (R. 578). When they were in bed together, Morris and a Montgomery private detective, both of whom had been hiding in the bathroom, jumped out and started taking photographs. Morris said word in substance as follows:

"Alright sister, you wanted a divorce. Now I want one, because I've got you where I want you." (R. 586)

Morris was acting crazy, and Maureene thought he was going to kill everybody in sight. He told her that he had five detectives with him (R. 592). He hit her and gave her a busted jaw. (R. 592). He then started writing something on paper which he then gave her to sign (R. 422-423). This document, entered unto

evidence as Plaintiff's Exhibit 43, was a separation agreement (R. 423). The agreement provided that Morris was to have custody of Ellie, the parties' nine-year old daughter. Maureene was to receive "25,000 alimony-in-gross upon the "execution" (sic) of a divorce, and that in addition she was to receive \$1,500 per month as alimony for a period of three years from the divorce. Under this agreement, Maureene relinquished all claims to any real estate owned by Morris, and agreed to return to him the diamond ring which he had given to her. Dees v. Dees, Brief of Appellant, Case No. 2114, page 12.

▪ **Morris' Sexual Appetite**

Prior to Morris' permanent involvement with the McGaha woman, Maureene had endured a long series of degrading incidents which evidenced Morris' voracious and eclectic sexual appetite. Since early in their marriage, Morris repeatedly bragged to Maureene that with his looks and his money he could have any woman he wanted, and he constantly bragged about women propositioning him (R. 350, et seq). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

Later in the marriage he repeatedly told her of women that he had had sexual intercourse with during the marriage (R. 354). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

Early in the marriage, Morris gave her a book on "Open Marriage" and started encouraging her to have sexual intercourse with other men (R. 419-420). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

He said further that he enjoyed trying to turn on gay people and he expressed a desire to have an experience with a gay (R. 354). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

Becky Logan. During the year or so after they were married, Maureene became aware that her husband was having an affair with a woman name Becky Logan (R. 458). During the same period, she began receiving anonymous telephone calls concerning her husband and a black woman in town (R. 459). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

Dianne Hicks. In his deposition, Morris admits that in the spring of 1973 (Morris depo. p. 27), or during the summer of 1973 (Morris depo. p. 25), he had an affair with Dianne Hicks, a Mobile lawyer who was working for the Southern Poverty Law Center (Morris depo. p. 25). He had sex with her during a canoe trip down the Tallapoosa River (Morris depo. p.25), and also in Brewton where they were working together on a trial (Morris depo. p. 26-27). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

Cathy Bennett. In the fall of 1974, Morris brought to the family home in Mathews a girl named Cathy Bennett who was a psychologist who had worked

with Morris on several cases (R. 284). She stayed in their home in Mathews for about a week, during which time they had Bobby Kennedy there as a guest (R. 285). Maureene was suspicious of her husband's relationship with this girl (R. 286), and later Morris admitted having an affair with her (R. 1325). Morris told Mrs. Dees that his affair with her was over in December, 1974, but she later found that he and Cathy continued to conduct an affair in Atlanta where Morris lived for a period during the Jimmy Carter campaign (R. 287, 291). Dees v. Dees, Brief of Appellant, Case No. 2114, page 13.

Judith Rogers. In the fall of 1977 (R. 1344), Morris and Maureene held a Little Theatre party at their home, attended by Dr. Rogers, a Montgomery physician, and his wife Judith, who is a criminal psychologist (R. 292, 1344, 1345). During the party Morris admits that he took Judith into a back room of his house, while the party was going on, and had intercourse with her (R. 1344, 293). Dees v. Dees, Brief of Appellant, Case No. 2114, page 14.

Deborah Levy. In the spring of 1976, Morris invited to the house Deborah Levy who worked for the American Civil Liberties Union in New York, and the man with whom she lived in New York, Michael Gaas (R. 299, 303). The Southern Poverty Law Center was considering starting a magazine in opposition to the death penalty, and Morris was interviewing Deborah Levy for the job of running the magazine (R. 301). She was not hired for the job, but she and her boyfriend did visit the Dees home in Mathews for several days on two different occasions (R. 301). In August, 1976, Morris and Maureene took them on a canoe trip down the river (R. 202-203). After supper, they had all gone to bed in sleeping bags, when Maureene woke up and found Morris and Deborah naked, having sex on the sandbar (R. 306). Morris turned to Maureene and insisted that she have sex with the other man. (R. 306). Later Maureene went back to sleep and woke up shortly before dawn, and found Morris and Deborah having intercourse again right next to her (R. 307). While having intercourse with Deborah, Morris leaned over and kissed Maureene (R. 308). The next morning Maureene objected strongly to the night's events and stated emphatically that she did not want anything of that nature to happen again (R. 309). The following month, in September, 1976, she and Morris went to New York for a tennis tournament and to take one of the children to a special school in Boston (R. 310). Over Maureene's objections, Morris insisted upon visiting Deborah Levy and Michael Gaas (R. 310). While the group was having dinner together in a restaurant Maureene, returning from the restroom, overheard Morris and Deborah making plans to be together the following afternoon (R. 315). Later when confronted with this Morris admitted having such plans (R. 320). Later in a conversation among the four of them, Morris stopped the conversation in the middle and said to Michael Gaas "I've just got to tell you this because I feel bad about it. I want to tell you that Deborah and I were planning to go off this afternoon and make love and I just want to tell you that." (R. 322). This embarrassed Maureene and made her furious (R. 324). Gaas responded that if that's what Morris was here to do he should just get up and go do it, following which Morris and Deborah got up and went into the

bedroom where they remained for about forty-five minutes (R. 325, et seq). While they were gone Maureene had sexual intercourse with Michael (R. 326). Afterward Morris left the apartment, returned in about thirty minutes and hit Michael in the face (R. 327). *Dees v. Dees, Brief of Appellant, Case No. 2114, page 14.*

Pamela Horowitz. *In the spring of 1977 Morris planned a trip to Kentucky and invited Maureene to go with him, knowing that she could not go because she was in rehearsal for a play (R. 330). Over Maureene's objection, he took with him, on his motorcycle Pamela Horowitz, a lawyer working for the Southern Poverty Law Center at that time (R. 331). He drove the motorcycle and she rode behind him from Montgomery to Kentucky, and they were gone for four or five days, during which they shared the same hotel accommodations (R. 331-332). Dees v. Dees, Brief of Appellant, Case No. 2114, page 14, 15.*

Charlie Springman (homosexual). *On August 11, 1978, Maureene and Morris' tenth anniversary, they were having dinner at the Watergate Hotel in Washington, D.C., and afterward had drinks in the bar (R. 333, et seq). In the bar, they saw Charlie Springman, who Maureene knew as a Regional Coordinator for the National Endowment of the Arts (R. 335). She had told Morris that Springman was gay, but Morris had never met him. When they saw him in the bar, Morris suggested inviting him over for a drink (R. 335). After a while, to Maureene's surprise, Morris suggested that Charlie come up to the room with them (R. 336). In the room, they drank wine and talked, and Morris unbuttoned his shirt to the waist (R. 336). Charlie tried to leave several times but Morris wouldn't let him (R. 337). Finally Morris proposed that Charlie spend the night with them (R. 337). Mrs. Dees protested, and put on her robe and nightgown to go to bed (R. 337-338). Soon Charlie and Morris were in the bed naked, with Maureene in the middle with her gown on (R. 338-339). Springman and Morris hugged and kissed, and Morris tried to get Charlie to have relations with Maureene, but Springman was physically unable to because he was not interested (R. 340). Dees v. Dees, Brief of Appellant, Case No. 2114, page 15.*

In fact, no one made any effort to have sex with Mrs. Dees during this incident (R. 341). Springman kissed Morris' penis, and in fact, Morris complained that he bit him and that it hurt (R. 340). Morris kissed Springman on Springman's penis (R. 341). After about thirty minutes they all went to sleep (R. 342). When Maureene woke up the next morning, Morris was gone (R. 342), but Springman was still asleep in the bed. After five or ten minutes Morris returned and found Maureene crying. He apologized for the incident and said that he would not let anything like that happen again (R. 343). Morris denies parts of this episode, he admits its essential features: Morris admits that he invited Springman to the room (R. 1571); that Maureene put on a nightgown and robe and got into bed (R. 1537); that Morris got into bed with nothing but his underclothes on (R. 1575); and that Springman got into the bed naked (R. 1590). Dees v. Dees, Brief of Appellant, Case No. 2114, page 15.

Morris' Step-Daughter. Holly Buck, Maureene's daughter by a previous marriage, is eighteen years old (R. 728). She was seven years old when her mother and Morris married, and she has lived with them in the house at Mathews from then until the separation (R. 728). Holly testified that, in the summer of 1977, Morris attempted to molest her in the following incident (R. 729): One night Maureene and Morris were sitting drinking wine and discussing a case Morris was trying. She was with them. Around eleven or twelve o'clock Maureene went to bed and Holly stayed up with Morris discussing the case. Morris kept offering Holly wine some of which she accepted. At Morris' suggestion, they went outside to the pool, and he suggested that they go for a swim, but Holly was tired and declined (R. 731). She went to her room and then went into the bathroom. Looking out the window, she saw Morris in the bushes beside the bathroom window looking in (R. 731). She said "Morris, is that you", but he said nothing and ran away (R. 732). Two months later, she was asleep one night and Morris entered her room from Ellie's room, through the bathroom. He was in his underwear and he sat on the bed where Holly was lying on her stomach facing away from the door. He touched her on the back and woke her up. He told her that he had bought her a present, and he presented her with a vibrator. He plugged it in and said he had brought it to her. He proceeded to rub it on her back and said, "Let me show you how to use it" (R. 733). She said that's not necessary, but he started to place it between her legs when she raised her voice and said no loudly. He then took the vibrator and left (R. 734). All he had on was a pair of bikini underwear shorts (R. 734). About two hours later, she had fallen back asleep and he came back in (R. 735). He brought the vibrator with him, plugged it in and said again, "Let me show you how to use it." He tried to show her again by putting it between her legs, but she raised her voice again and he stopped. He took it and left (R. 635). She did not tell her mother about this incident until the separation when they moved out of the Mathews house in the spring of 1979 (R. 736). *Dees v. Dees*, Brief of Appellant, Case No. 2114, page 15, 16.

Morris' Future Daughter-in-law. Karen Sherman Dees is Morris' daughter-in-law, who is married to Morris' son Scooter (Morris, III) (R. 345). Before Karen and Scooter were married, when they were eighteen or nineteen, which was three or four years ago, an incident occurred on Mother's Day at the family home in Mathews (R. 345). The Dees had Karen and Scooter to dinner at the house, and they cooked out (R. 346). While Scooter and Maureene were cleaning up and washing dishes, Karen and Morris went out to go swimming (R. 345). Five or ten minutes later, Maureene and Scooter started down the path toward the pool, with Maureene in front. As she approached the gate, she could see Morris and Karen standing with their arms around each other with no clothes on, and Morris had an erection. Maureene immediately turned and told Scooter that she did not want to go swimming and the two of them headed back to the house without Scooter having seen anything (R. 347). Later, Karen and Morris returned from the pool, fully dressed, and the group stayed in the den for a little while (R.

349). *Morris got up and went to bed, and Maureene joined him a few minutes later. While lying in the bed, Maureene looked up and saw that Karen had entered the room (R. 349). She didn't have any clothes on but had a towel or sheet wrapped around her (R. 350). She came over and got in the bed on Morris' side (R. 350). Nothing happened, but she remained there for about ten minutes, and eventually got up and left (R.350-351). Morris told Maureene that he just couldn't understand why she came in the room (R. 351). Dees v. Dees, Brief of Appellant, Case No. 2114, page 16.*

If the trial judge's decree is allowed to stand, Morris will have succeeded in discarding his wife of eleven years at an unheard of bargain cost. If she receives it, Maureene's "alimony-in-gross" will cost Morris exactly three percent of his total wealth, or about one-half of this income for one year, and it will be fully tax deductible." Dees v. Dees, Brief of Appellant, Case No. 2114, page 16.

So, in 1979, if the lawyer's argument was close, Dees was worth approximately \$2.5 million dollars at the time.

CONCLUSION

It is clear that Morris Dees' ideas of fidelity, truthfulness, and fairness are vastly different from most people. If his ideas of morality include adultery, incest, homosexuality, abortion and other perversions, it makes you wonder on what basis Mr. Dees has to question anyone about anything. It certainly provides a clear motive for his views on WBC.