

1 Allen D. Butler, Esq.  
2 2342 S. McClintock  
3 Tempe, Arizona 85282  
4 BAR NO: 0005392  
5 Attorney for Plaintiff

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
7  
8 IN AND FOR THE COUNTY OF MARICOPA

9 Wilma Freeman, personally, and )  
10 as Personal Representative )  
11 for the Estate of John Barrow )

CASE NO: CV 97-00750

12 Plaintiff,

AFFIDAVIT OF  
JANICE HAYWARD

13 vs.

14 THE CHURCH OF SCIENTOLOGY, )  
15 and John and Jane Does A-D, and )  
16 Corporations 1-9, and )  
17 Partnerships I-X )  
18 Defendants. )

19 STATE OF ARIZONA )  
20 )  
21 COUNTY OF MARICOPA )

22 JANICE HAYWARD, BEING FIRST DULY SWORN, DEPOSES UPON HER OATH  
23 AND SAYS:

- 24 1. I am over 18 years of age, and have personal knowledge of the  
25 events set forth herein.
- 26 2. In January or February of 1991 I began taking Dianetics Courses  
27 from the Church of Scientology in Phoenix, Arizona.
- 28 3. My purpose in associating with the church was to obtain  
certain promised results to clear my mind and body from the effects  
of certain traumas and bad experiences in my life, including child  
abuse and a serious car accident, and to achieve career success.
4. In 1991 I was a active and practicing Christian attending a  
local Christian congregation.

1 5. At the time I became associated with the Church, I was told  
2 that I did not have to become a member of the Church of  
3 Scientology, but that if I became a member I would receive  
4 discounts for the courses I wanted to take.

5 6. In order to receive the discounts I took out a membership. At  
6 the time I took out the membership I was not asked to abandon my  
7 Christian beliefs, nor was I asked to embrace the religious or  
8 spiritual teachings of the Church of Scientology.

9 7. From 1991 to 1995 I paid over \$60,000 to the Church of  
10 Scientology.

11 8. During this time I took at least 14 courses from the Church of  
12 Scientology. Each course was offered at a specific price. I took  
13 the following courses among others:

- 14 1. Ups and Downs of Life
- 15 2. Professional Hubbard Dianetics Auditor Course
- 16 3. Method One Co-audit
- 17 4. Student Hat
- 18 5. PTS/SP Course
- 19 6. Therapeutic TR's Course
- 20 7. Pro TR's Course
- 21 8. How to Improve Conditions in Life
- 22 9. Financial Success Course
- 23 10. Upper Indoctrination
- 24 11. Academy Level 0
- 25 12. How to Improve Relations with Others
- 26 13. How to make Work Easier
- 27 14. Scientology Handbook Course

28 9. I paid for additional courses which I did not receive. I also  
paid for various books, tapes and other materials. I did not  
receive the promised benefits.

10. At no time during the time I was associated with the Church of  
Scientology was I asked to abandon my Christian Beliefs, nor was I  
asked to embrace any of the religious tenets of the Church of

1 Scientology.

2 11. Prior to, during, and after the time I was associated with the  
3 Church of Scientology I remained a practicing, believing Christian.

4 12. What attracted me to Scientology and Dianetics was the  
5 representations made that through their psychological program I  
6 could become free from physical and emotional pain, undesirable  
7 emotions, and the ups and downs of life. I did not join for  
8 spiritual purposes, nor did any representative of the Church  
9 request that I abandon my own religious beliefs or embrace any of  
10 the Church's religious beliefs. Even though I became a "member" of  
11 the Church, that action was taken solely because I was told that  
12 was the way to obtain the discounts. At no time was I asked to  
13 embrace any religious or spiritual doctrine, nor did I.

14 13. In 1996 I filed a lawsuit against the Church of Scientology to  
15 recover the monies paid plus damages for emotional and mental pain.  
16 I represented myself in the lawsuit because I could not afford an  
17 attorney, having paid so much to the Church. I subsequently  
18 requested that the case be dismissed because I was unable to  
19 continue without an attorney. The case was subsequently dismissed  
20 without prejudice.

21 14. While the Church of Scientology represents itself as a church,  
22 to my knowledge it does not hold church or religious services.

23 15. I was promised that if I took the courses and followed the  
24 program that I would receive the benefits of freedom from  
25 emotional, physical and mental pain and distress, as well as  
26 career success. Furthermore, I was promised that if the promised  
27 results were not achieved all monies would be refunded.

28 16. The promised results were not achieved. To the contrary,

1 following my involvement with the Church of Scientology I was  
2 released from two separate positions with Phoenix Union High School  
3 District. I am currently unemployed, being unable to find a job.  
4 I am not free from emotional, physical or mental pain. In fact, I  
5 feel that the Church itself was a cause of much emotional, physical  
6 and mental pain, not to mention the huge financial loss which I  
7 incurred.

8 14. FURTHER AFFIANT SAYETH NAUGHT.

9 DATED THIS 19 DAY OF MARCH, 1997.

10  
11 Janice Hayward

12 JANICE HAYWARD

13 SUBSCRIBED AND SWORN TO BEFORE ME THIS 19 DAY OF MARCH BY JANICE  
14 HAYWARD, KNOWN TO ME TO BE THE PERSON WHOSE NAME APPEARS HEREIN.

15  
16 Jennifer Coole (COOLE)  
17 NOTARY PUBLIC

