

AFFIDAVIT OF FORD MARTIN SCHWARTZ

I, Ford Martin Schwartz, of 825 Oak Grove Road, Concord, California, hereby depose and state under the pains and penalties of perjury as follows:

1) This affidavit is based upon personal knowledge and also upon information and belief where so stated.

2) In spring, 1980, I was "recruited" to work for the "Guardian's Office" (G.O.) of the Church of Scientology. I worked for Branch 1 of the Guardian's Office which is

concerned with external intelligence gathering. Another function of the G.O. is that of an internal secret police. The primary contacts that I had in the G.O. were Chris Vetter, Bill Craig, and Michael Woods.

3) In 1980, I was assigned to a project, the purpose of which was for me to become a public opinion leader in the anti-cult field and among those who were investigating Scientology. This mission was assigned to me by Bill Craig, and later confirmed by Michael Woods, both of whom were holding the position of Assistant Guardian for Information. Other G.O. officers confirmed at various points in time the purpose of this mission.

4) The purpose of becoming a public opinion leader against the Church of Scientology was so that I could infiltrate and penetrate any individuals or groups opposed to the Church including Attorney Michael J. Flynn of Boston, Massachusetts, who I referred to in conversation with other G.O. personnel as "The Flynn Network". However, specific limitations and delineations were at times imposed by my G.O. superiors as regards to my activities involving Michael Flynn and his associate attorneys in Boston.

5) in connection with this project, I maintained my position with the "Freedom Counseling Center" in Burlingame, California as a "counselor" or "deprogrammer". I had previously secured this position in November 1980 as a consequence of another G.O. project.

6) A large deal of the information that I gathered concerning anybody who criticized the Church of Scientology would pass on to the G.O.

7) In January 1981, I contacted Attorney Michael Flynn for the purpose of becoming his client in order to bring a potential lawsuit against the Church. This particular mission was very closely monitored by the G.O. For this purpose, I used Henrietta Crampton of the Citizens' Freedom Foundation in Redondo Beach, California. She was well known in the anticult field and did not suspect that I was a Scientology agent. In my initial contact I informed Attorney Flynn of my cover story, whereupon he transferred me to Kevin Flynn, who requested that myself and my wife write out a "statement" of our experiences within the Church of Scientology. After receiving clearance from the G.O., I sent an unsworn statement to Michael Flynn in February 1981. At that time, Bill Craig again informed me that the Flynn office had been penetrated and that the G.O. had secured

extensive information about the "Flynn Network".

Craig told me this time that the purpose of contacting Attorney Flynn at that time was to obtain credentials as an anti-Scientologist which would be enhanced because of my association with the "Flynn Network". These credentials could be used for other intelligence gathering or espionage operations.

8) Craig informed me on numerous occasions that the Flynn office had been penetrated and that it was in the process of "taking him down" through lawsuits and disbarment proceedings.

9) In May 1981, Craig informed me that he wanted me to attend a meeting, in the Flynn office which was taking place around May 10, 1981 among various lawyers throughout the country who were involved in Scientology litigation. This meeting was taking place in Boston, Massachusetts, and Craig authorized the payment of G.O. or Church money to fly to Boston for the purpose of "penetrating" this meeting. Craig told me that all expenses for the trip, including airfare, hotel bill, etc., would be covered by cash from the G.O. I then flew to Los Angeles where I met with Gary Lawrence, and Jeff Sherrel, both of whom were G.O. opera-

tives. Sherrel introduced himself as the **person in charge** of U.S.G.O. Branch 1 activities for the **Northeast** sector, which included Boston and New York. They both briefed me on various Flynn **activities** and this "briefing" indicated that they had an extensive knowledge of the operations of **Attorney Flynn's** office. The total expenses for this trip were \$ 9.94 all of which was paid to me in cash by Sherrel or before and after the meeting in **Boston**.

10) After this "briefing", I flew to Boston where I waited briefly in a room from which I **could** overhear a few closing comments by **Michael Flynn** in the meeting of attorneys and also me:: with **Fred Joseph**, an **attorney** from Washington, D.C. in regard to my own case. I reported the details of the meeting that I had obtained to the G.O. including how many I saw in attendance, the names of those I was introduced to, and **specifically** whatever I heard state3 to the best of my ability to recall. At no time during this meeting did I ~~ever~~ hear Michael Flynn mention Flynn Associates Management ~~Company~~ (FAMCO) or that FAMCO would in any way participate in the fee relationship, **no**; did I **report** to the **G.O.** or make any **mention** of FAMCO.

11) After the meeting, I was thoroughly debriefed by Jeff **Sherrel** and Gary Lawrence and they informed me that

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"Flynn's days were numbered" and that they were in the process of "taking him down".

12) I used my contacts with Attorney Michael Flynn to further establish my credentials among anti-Scientists, wherein using this cover I became involved in numerous operations into situations to which I would not have been privy without the Flynn cover.

13) On one occasion, Bill Craig informed me that his supervisor, Peter Alvett said that one of the means that the G.O. had used to penetrate the Flynn office was the placement of Silvana Garritano there as his secretary. Craig informed me that after Garritano was placed as a G.O. agent, Chris Vetter related being present at a big party at the U.S.G.O. after the announcement to the other branches of the U.S.G.O. that Garritano was openly taking steps to get Flynn disbarred with the claim that Garritano was used to sign a false affidavit under the duress of Michael Flynn. Craig informed me that Flynn would be disbarred shortly with the Garritano operation. Several times I was informed by G.O. personnel that the Church of Scientology had received legal advice which was being followed by the Church of Scientology and that therefore the G.O. public relations

bureau had ceased the public dissemination of information against the impending disbarment of Flynn so that the Massachusetts Bar Association would not view it as a media campaign.

14) I learned later that one of the attorneys who was present at the May 1981 meeting was Greg Hull of San Francisco, California. As a result of my connection with the Flynn office I was able to penetrate Hull concerning the number of potential litigants against the Church in the San Francisco area. On many occasions, I was requested by Bill Craig, operating he stated on urgent requests and orders from the U.S.G.O. to intimidate Hull and prevent him from bringing cases against the Church of Scientology by in part, informing him of the impending Flynn disbarment using the claim that Silvana Garritano had been forced to sign a false affidavit.

15) I was, at one point, informed that Michael Flynn was being followed, that he looked terrible, and that the operations against him were extremely successful.

16) In connection with my nationally established position, I received weekly calls from sources throughout

the United States, including Paulette Cooper, providing me with information of the activities of **Michael** Flynn and the cases he was **involved** in against the **Church**.

17) Around November 1981, an individual named Joan ... was refer **myself** to Greg Hull for the purpose of **representing** Ms. Eden in a lawsuit against the Church for **jud** in connection with the Church's promise to cure her leukemia. Ms. Eden contacted the Freedom Counseling Center, though I refused to see her as a client. Clearly stating this fact to **both** Lowell **Streiker** (the Executive Director of the **Freedom Counselin** Center who Ms. Eden was **seeing**) and to Ms. Eden, I **was able** to debrief her on her legal situation. I learned that her previous attorney in Sacramento had discovered discredibile information regarding Ms. **Eden's** past history and had been discouraged from pursuing her suit. **Another** member of the counseling center, Lowell Streiker, **met** with Ms. Eden and several members of the G.O. After **that meeting**, I met secretively with Woods and Jeff Shivelle, the **Comptroller's Assistant** for Information who had been **meeting** that day with Lowell Streiker and Ms. Eden. I **reinformed** Woods of the inside information previously gathered and reported to him. Eden had paid a considerable amount of money to **the** Church including taking **out** a mortgage

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on her home in order to come up with money to pay for auditing in order to cure her leukemia. Later, after the G.O. successfully prevented a settlement from going through, Eden died, and the G.O. became extremely concerned that the Church of Scientology could be made subject to a successful wrongful death suit.

18) In January 1992, I received a partial copy of the "Flynn Report" to the Clearwater City Commission about the Church of Scientology. In connection with this Report, and a biography of L. Ron Hubbard done by Michael Linn Shannon and the facts of a deprogramming I was currently involved in, I learned things about Scientology and L. Ron Hubbard which stunned me into a realization about what I was doing. I then went to Margaret Singer, a well known psychologist involved in cult cases and informed her of some of the types of things that I had been doing. Subsequently, I went to the Federal Bureau of Investigation and to the Justice Department concerning my activities. The G.O. was unaware of the fact that I had gone in such a manner to Dr. Margaret Singer, the Justice Department or the F.B.I.

19) In March 1982, Michael Woods and Peter Alvette were ordered to go to Boston, where I met with Woods. woods

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told me that the reason he was in Boston was to get new agents into the Flynn office because the last mission seeking to penetrate the Flynn office had failed. He told me that since they had lost their last agent inside the Flynn office, the only line they had in on him was his garbage. He told me that although Flynn now had a shredder, the G.O. was still able to piece the shredded pieces back together, and that they had an individual who was a specialist in connection with such operations. Woods told me that he had a list of 160 people who were then being considered as new agents to penetrate the Flynn office. These agents were in the process of being recruited by the G.O. Woods requested that until another agent could be successfully placed in the Flynn office I re-establish my penetration. At that time, after several meetings with Woods, in which he pleaded and urged that I conduct the type of penetration described, I agreed. Although I was secretly out of Scientology at that time, and had already gone to the FBI, I had previously discussed at length the reason why I couldn't penetrate the Flynn office further including the fact that Flynn would likely use me as a witness placing me in a position wherein to keep my cover I would have to perjure myself and which I had stated many times, I would not do. Woods told me that I should state various "half truths" without stating that I should directly perjure

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myself. At the time, I was caught in between having gone to the FBI without the G.O. knowing it, and still being considered an internal double agent for the G.O. Woods requested that I call Attorney Thomas Hoffman from the Flynn office because of my uneasiness regarding the credibility of L. Ron Hubbard, Jr. as a person for the discussion. I pretended some nervousness after being present at the Center on Destructive Cultism in Weston, Mass. with a freshly deprogrammed Scientologist while present at the same moment was a server attempting to serve Dr. Jack Clark with his second Scientology suit. I used nervousness of my cover being blown as a device to delay my return to San Francisco, wherein Woods called me repeatedly seeking to use me to prevent L. Ron Hubbard, Jr. from testifying in Clearwater. I refused all of the operations that he wanted me to participate in for the foregoing purpose. Woods told me that the operation to prevent L. Ron Hubbard, Jr. from testifying had become a top level G.O. order and that I was to use all of my credentials in connection with Flynn and with Hubbard, Jr. in order to prevent Hubbard, Jr.'s testimony.

20) On April 13, 1982 an individual whose name

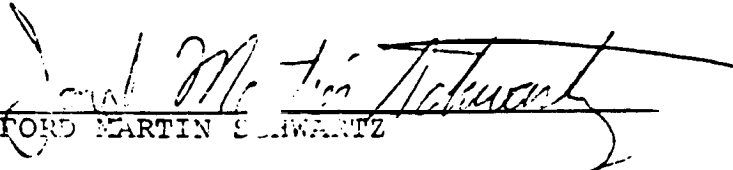
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was "Steve" came to meet me with Michael Woods and informed me that he, Steve, was in charge of a mission called "All Clear" in order to get Hubbard's name off all of the litigation against Church of Scientology. They further informed me that an individual named Gerry Armstrong had recently defected and that Armstrong had been working with Mark Garrison concerning a forthcoming biography about Hubbard. They informed me that Armstrong had defected and that Armstrong had had access to L. Ron Hubbard, Jr.'s B-1 file, which contained correspondence between myself and Hubbard, Jr. They told me that Armstrong had been in touch with L. Ron Hubbard, Jr. since his defection and they feared he might be able to deduce I was a double agent for the G.O. Steve ordered me to disseminate information that Armstrong was actually a G.O. agent and was not to be believed by opponents of Scientology. I advised him that this would be stupid and that Paulette Cooper would love to subpoena Gerry Armstrong. Steve then rescinded the order.

21) Subsequently, I contacted Paulette Cooper, who was involved in litigation against the Church of Scientology, and Michael Flynn and informed them that from November of 1980 until January of 1982 I had been operating as a double agent for the Church of Scientology. Mr. Flynn requested me

to prepare a statement relative to my activities. Although the operations I have been involved in cover hundreds of situations in which I acted as an espionage agent for the G.O. passing on information to them and doing what they requested me to do, this affidavit is merely intended to be a general outline of operations I was involved in against Joseph P. Flynn.

Signed under the pains and penalties of perjury  
this 3<sup>rd</sup> day of July, 1982.

  
FORD MARTIN SCHWARTZ