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FILED

JAN 31 1985

CLERK, U.S. DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 BY DEPUTY

10 . . . IN THE UNITED STATES DISTRICT COURT  
 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

85.711 •"

13	RELIGIOUS TECHNOLOGY CENTER,	) CIVIL ACTION NO. _____	YT & P
14	A California Corporation,	)	1/K
15	[CHURCH OF SCIENTOLOGY INTERNATIONAL	)	V_T
16	INC., a California corporation	) COMPLAINT FOR RACKETEERING;	
17	CHURCH OF SCIENTOLOGY OF	) FALSE DESCRIPTION OF	
18	'CALIFORNIA, INC. a California	) ORIGIN; COMMON LAW UNFAIR	
19	corporation,	) COMPETITION; STATUTORY	
20	Plaintiffs,	) UNFAIR COMPETITION; RECEIPT	
21	v.	) AND CONCEALMENT OF STOLEN	
22	j	) PROPERTY; BREACH OF TRUST;	
23	ROBIN SCOTT, an individual;	) BREACH OF CONTRACT; TRADE	
24	;ADRIENNE SCOTT, an individual; RON	) SECRET MISAPPROPRIATION;	
25	LAWLEY, an individual; MORAG	) INJUNCTIVE RELIEF AND	
26	BELLMARINE, an individual'; STEVEN	) DAMAGES	
27	BISBEY, an individual; ADVANCED	)	
28	ABILITY CENTER CANDACRAIG, a	)	
29	corporation; ADVANCED ABILITY	)	
30	CENTER EAST GRINSTEAD, a	)	
31	corporation;.CHURCH OF THE NEW	)	
32	CIVILIZATION, (dba ADVANCED ABILITY	)	
33	CENTER,) a California corporation;	)	
34	HARVEY HABER, an individual;	)	
35	JOHN NELSON> an individual;	)	
36	JON ZEGEL, an individual; VIVIEN	)	
37	ZEGEL; an individual; DA"ID MAYO,	)	
38	an individual; and DOES 1 through	)	
39	100, inclusive,	)	
40	Defendants.	)	



PARTIES

1  
2           2. Plaintiff CHURCH OF SCIENTOLOGY INTERNATIONAL,  
3 INC. (hereinafter "CSI") is, and was at all times relevant  
4 herein a California non-profit religious corporation having its  
5 principal office in the City of Los Angeles, County of  
6 Los Angeles, State of California.

7           3. Plaintiff RELIGIOUS TECHNOLOGY CENTER ("RTC") is,  
8 and was, at all times relevant herein, a California non-profit  
9 religious corporation having a principal office in the City of  
10 Los Angeles, County of Los Angeles, State of California.

11           4. Plaintiff CHURCH OF SCIENTOLOGY OF CALIFORNIA  
12 (hereinafter "CSC") is, and was at all times relevant herein, a  
13 California non-profit religious corporation having a principal  
14 office in the City of Los Angeles, County of Los Angeles, State  
15 of California.

16           5. Plaintiffs are informed and believe and thereon  
17 allege that Defendants ROBIN and ADRIENNE SCOTT are individuals  
18 residing at Candacraig House, Strathdon, Aberdeenshire, AB3 8XT  
19 in Scotland. Defendants ROBIN and ADRIENNE SCOTT were, until on  
20 or about September of 1983, staff members of the CHURCH OF  
21 SCIENTOLOGY-ADVANCED ORGANIZATION SAINT HILL. Both SCOTTS were  
22 also members of the SEA ORGANIZATION (hereinafter "SEA ORG"),  
23 which organization is a fraternal organization existing within  
24 the Religion of Scientology and has no corporate structure or  
25 identity. The SEA ORG consists of highly dedicated members who  
26 work in organizations which adhere to the Religion of  
27 Scientology. Members of the SEA ORG take vows of fraternal  
28 service and are sworn and bound to the highest standards of

1 ethical conduct, personal dedication and loyalty within the  
2 religion. The SEA ORG is 'not -n plaintiff in this action. Both  
3 SCOTTS were also members of the Church of Scientology Religious  
4 Education College (hereinafter, "REC"), an association of United  
5 Kingdom Churches which operate under CSI's ecclesiastical  
6 supervision. Consequently, tie SCOTTS occupied positions of  
7 high fiduciary duty and trust, with access to many of  
8 Plaintiffs' confidential and proprietary materials. By reason  
9 of their positions of high fiduciary duty and trust, the SCOTTS  
10 were obligated to maintain the confidentiality of advanced and  
11 confidential Scientology counseling and spiritual healing  
12 procedures. Defendant ROBIN SCOTT was obligated by written  
13 contracts with CSC not' to disclose confidential information or  
14 materials gained as a consequence of employment or membership  
15 with CSC. Defendant ADRIENNE SCOTT was also obligated by  
16 written contracts with REC not to disclose confidential  
17 information or materials gained as a consequence of employment  
18 or membership with REC.

19           6. Plaintiffs are informed and believe and thereon  
20 allege that Defendant RCN LAWLEY is an individual residing at 36  
21 St. James Road, East Grinstead, West Sussex, in England.  
22 Defendant LAWLEY was a member of REC and occupied e position of  
23 high fiduciary duty and trust, with access to many of  
24 Plaintiffs' confidential and proprietary materials. LAWLEY was  
25 therefore obligated to maintain the confidentiality of advanced  
26 and confidential Scientology counseling and spiritual healing  
27 procedures. Defendant LAWLEY was also obligated by written  
28 contracts with CSC and REC not to' disclose confidential

1 information or materials gained as a consequence of employment  
2 or membership in CSC and RTC.

3 7. Plaintiffs are informed and believe and thereon  
4 allege 'that Defendant MORAG BELLMAINE is an individual residing  
5 at 52 West Hill, East Grinstead, Sussex, in England. Defendant  
6 BELLMAINE was a member of REC and occupied a position of high  
7 fiduciary duty and trust, with access to many of Plaintiffs'  
8 confidential and proprietary materials. BALLMAINE was thi.-refore  
9 obligated to maintain the confidentiality of advanced and  
10 confidential Scientology counseling and spiritual healing  
11 procedures. Defendant BALLMAINE was also obligated by written  
12 contracts with CSC and REC not to disclose confidential  
13 information or materials gained as a consequence of employment  
14 or membership in CSC and REC.

15 8. Plaintiffs are informed and believe and thereon  
16 allege that Defendant STEVEN BISBEY is an individual residing at  
17 52 West Hill, East Grinstead, Sussex, in England, RH 194EP.  
18 Defendant BISBEY was a member of REC and occupied a position of  
19 high fiduciary duty and trust, with access to many of  
20 Plaintiffs' confidential an-! proprietary materials. BISBEY was  
21 therefore obligated to maintain the confidentiality of advanced  
22 and confidential Scientology counseling and spiritual healing  
23 procedures. Defendant BISBEY was also obligated by written  
24 contract with CSC not to disclose confidential information and  
25 materials gained as a consequence of employment or membership  
26 with CSC.

27 9. Plaintiffs are informed and believe and thereon  
28 allege that Defendant, ADVANCED ABILITY CENTER CANDACRAIG

1 hereinafter, ("AAC ~ CAN") is asincorporated organization in  
2 the Country of Scotland, having its principal place of business  
3 at Candacraig House, Strathdon, Aberdeenshire, AB3 8X? in  
4 Scotland.

5 10. Plaintiffs are informed and believe and thereon  
6 allege that ADVANCED ABILITY CENTER EAST GRINSTEAD ("AAC-GRIN")  
7 is a corporation located in East Grinstead, Sussex, England.

8 11. Plaintiffs are informed and believe and thereon  
9 allege that Defendant CHURCH OF THE NEW CIVILIZATION doing  
10 business as the ADVANCED ABILITY CENTER (hereinafter "AAC"), is,  
11 and was **at all** times relevant herein, a California corporation  
12 **having its** principal place of business in the City of Santa  
13 Barbara, County of Ventura, State of California. Plaintiffs are  
14 informed and believe and thereon allege that Defendants MAYO,  
15 HABER, NELSON and JOHN ZEGEL were founders of Defendant AAC and  
16 are current members of its Board of Directo. s. Defendant MAYO  
17 is the President of Defendant AAC and Defendants NELSON and  
18 HABER are currently employed as staff members.

19 12. Plaintiffs are informed and believe and thereon  
20 **allege that** Defendant HARVEY HABER is an individual residing in  
21 the City of Montecito, County of Ventura, State of California.  
22 Defendant HABER was a staff member of CSC and a member of the •  
23 SEA ORG. Accordingly, he occupied a position of high fiduciary  
24 duty and trust and was obligated to maintain the confidentiality  
25 of the advanced and confidential Scientology counseling and  
26 spiritual healing procedures. Defendant HABER was also.

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1 obligated by written contract with CSC not to disclose  
2 confidential information or materials gained as a consequence of ...  
3 employment or membership with CSC.

4 13. Plaintiffs are informed and believe and thereon  
5 allege that Defendant JOHN NELSON" is an individual residing in  
6 City of Santa Barbara, County of Ventura, State of California.  
7 Defendant NELSON was a member of CSI and a member of the SEA  
8 ORG. Accordingly, he held a position of high fiduciary duty and  
9 trust was obligated to maintain the confidentiality of advanced  
10 and confidential Scientology counseling and spiritual healing  
11 procedures. Defendant NELSON was also obligated by written  
12 contract' with CSI not to disclose confidential information or  
13 materials gained as a consequence of employment or membership  
14 with CSI.

15 14. Plaintiffs are informed and believe and thereon  
16 allege that Defendant JON ZEGEL is an individual residing in the  
17 City of North Hollywood, County of Los Angeles, State of  
18 California. JON ZEGEL was a founding member and a member of the  
19 Board of Directors of Defendant Advanced Ability Center.

20 15. Plaintiffs are informed and believe and thereon  
21 allege that Defendant VIVIEN ZEGEL is an individual residing in  
22 the City of North Hollywood, County of Los Angeles, State of  
23 California.

24 16. Plaintiffs are informed and believe and thereon  
25 allege that Defendant DAVID MAYO is an individual who resides in  
26 the City of Santa Barbara, County of Ventura, State of  
27 California. Defendant MAYO received training in the use of  
28 certain materials of the Advanced Technology known as the NOTS

1 materials, which materials are defined more fully below.  
2 Defendant MAYO was a staff member of the CSC and a member of SEA  
3 ORG. Accordingly, he occupied a position of high fiduciary duty  
4 and trust, with access to many of Plaintiffs' confidential and  
5 proprietary materials and was obligated to maintain the  
6 confidentiality of advanced and confidential Scientology  
7 counseling and spiritual healing procedures. MAYO was also  
8 obligated by written contract with CSC not to disclose  
9 confidential information or materials gained as a consequence of  
10 employment or membership in CSC.

11           17. Plaintiffs are ignorant of the true names and  
12 capacities of defendants sued herein as DOES 1 through 100  
13 inclusive and therefore sue these defendants by such fictitious  
14 names. Plaintiffs are informed and believe and thereon allege  
15 that each of said fictitiously named defendants is responsible  
16 in some manner for the occurrences alleged herein and is in some  
17 manner liable and responsible to plaintiff with respect thereto.  
18 When plaintiffs learn the true names and capacities of these  
19 fictitiously named defendants, they will amend this complaint to  
20 set forth their true names and capacities together with all  
21 necessary charging allegations.

22           18. Plaintiffs are informed and believe that at all  
23 times relevant herein, Defendants, and each of them, were acting  
24 as the agent and/or employee of each of the other Defendants.

25           19. Plaintiffs are informed and believe and thereon  
26 allege that Defendants, their agents and employees, and each of  
27 them, combined, conspired and agreed to engage in the unlawful  
28 conduct and activities as herein alleged.



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STATEMENT OF CASE

20. L. Ron Hubbard ("LRH").is the founder of the religion of Scientology which is based upon a body of truths, and technology for applying them, that were discovered, described and refined by him. LRH's writings and recorded spoken words regarding his applied religious philosophy and spiritual healing practices are referred to herein as "the technology."

21. The Religion and the technology are described in numerous works, many of which have been published and made generally available and some of which remain unpublished and not generally available. Among the published works are many works pertaining to the technology and the proper manner and standards for application of the technology. Many of the works are devoted to the training of members in the philosophy and in the proper application of the technology in accordance with prescribed standards.

22. Among the unpublished works is a body of special works known as and referred to hereinabove as "Advanced Technology," which is, as its name suggests, of an advanced and specialized nature. The- Advanced Technology is regarded as suitable only for those who have been trained in the more basic levels of the Religion's philosophy and the technology. A portion of the Advanced Technology has been identified by the proprietary designation "NOTS," sometimes referred to as "NOTS PACKS." Many other proprietary designations are used and associated with various aspects of the technology.

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1           23. The Advanced Technology consists of confidential  
2 and proprietary information regarding counseling and training  
3 that is suitable for use only by qualified members of the  
4 related organizations of the Religion and has been protected by  
5 authorized organizations of the Religion as trade secret  
6 information. This information has been and is a very valuable  
7 source of economic advantage.

8           24. Standards, policies and specifications for the  
9 counseling and training services of the Religion, including the  
10 Advanced Technology, are a part of the technology. Plaintiffs  
11 and other authorized organizations insure that these standards,  
12 policies and specifications are followed and applied by the  
13 related organizations and members of the Religion.

14           25. RTC was designated as the protector of the  
15 Religion, its philosophy and its technology, including the  
16 Advanced Technology. RTC acquired rights in the Advanced  
17 Technology in the United States for the confidential use of RTC  
18 and its related organizations. In addition, RTC undertook the  
19 responsibility for maintaining the purity and ethical use of the  
20 philosophy and the technology, and for the protection and proper  
21 delivery of the Advanced Technology. RTC has authorized CSC and  
22 CSI to utilize the Advanced Technology in accordance with  
23 certain terms and conditions.

24           26. CSI is an organization related to RTC and CSC and  
25 is the "Mother Church" of the Religion, having more than 100  
26 related churches and missions and other organizations of the  
27 Religion located in the United States and in more than thirty  
28 foreign countries throughout the world. CSI is licensed by RTC

1 to deliver training in the Advanced Technology to members who  
2 are qualified and who agree to maintain and protect the  
3 confidentiality of the Advanced Technology. CSC is in turn  
4 licensed by CSI to deliver training in Advanced Technology to  
5 members who are qualified and who agree to maintain and protect  
6 the confidentiality of the Advanced Technology.

7 27. Plaintiffs have been supervising and controlling  
8 the quality of the application of the philosophy and the  
9 technology of the Religion by related organizations throughout  
10 the United States and elsewhere in the world, including the  
11 **licensing and delivery of training in the Advanced Technology,**  
12 and **including** that portion of the Advanced Technology identified  
13 by the designation "HOTS." During this period of supervision  
14 and control of quality, the related organizations of the  
15 Religion have grown and prospered.

16 28. Plaintiffs are informed and believe and thereon  
17 allege that as early as July of 1983, and possibly earlier, the  
18 Defendants began to conspire among themselves to unlawfully  
19 misappropriate, steal, counterfeit, use, alter and otherwise  
20 **disseminate certain** confidential and proprietary materials of  
21 CSI, RTC and CSC, including the portion of the Advanced  
22 Technology identified by the designation "NOTS"; and have done  
23 so in furtherance of a common plan and design to establish a  
24 network of organizations, including Defendants Advanced Ability  
25 Center, Advanced Ability Center-Candacraig ("AAC-CAN") and  
26 Advanced Ability Center-East Grinstead ("AAC-EG"), to use, alter

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1 and disseminate the stolen materials and information  
2 fraudulently and for the purpose of attracting and servicing a  
3 clientele, all to the detriment of Plaintiffs.

4 29. On September 12, 1983, Defendants ROBIN and  
5 ADRIENNE SCOTT, formally resigned from the CHURCH OF SCIENTOLOGY  
6 - ADVANCED ORGANIZATION SAINT HILL and thereby relinquished all  
7 affiliations with Plaintiffs and related entities. Thereafter,  
8 Defendants declared their intention to establish an organization  
9 which would oppose Plaintiffs and to build that organization  
10 with Plaintiffs' confidential and proprietary materials.

11 30. Plaintiffs **are** informed and believe and thereon  
12 allege, that on or about October, 1983, Defendant ROBIN SCOTT  
13 and others yet unknown, approached staff members at the Church  
14 of Scientology Advanced Organization Saint Hill ("AOSH") in East  
15 Grinstead, England and offered to pay money for the unauthorized  
16 release of Plaintiffs' confidential materials, including  
17 materials identified by the designation "NOTS". Plaintiffs  
18 further allege on information and belief that Defendants'  
19 efforts were unsuccessful.

20 31. Plaintiffs are informed and believe and thereon  
21 allege, that in or about December 1983, Defendants ROBIN and  
22 ADRIENNE SCOTT purchased the Candacraig House, the current  
23 location of Defendant AAC-CAN, for the purpose of establishing  
24 the aforementioned organization and using it as a center where  
25 the aforementioned confidential and proprietary materials, and  
26 copies thereof, were to be utilized in training and counseling  
27 activities without the approval or supervision of Plaintiffs.

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1           32. On or about December 9, 1983, Defendants ROBIN  
2 SCOTT, LAWLEY and BELLMAINE entered the Church of Scientology  
3 Advanced Organization Saint Hill Europe and Africa located in  
4 Copenhagen, Denmark ("AOSH-EU/AF") under false pretenses,  
5 introducing themselves as being authorized officials of RTC.  
6 These Defendants then orderd that a private room be provided to  
7 them for the purpose of inspecting Plaintiffs' highly-  
8 confidential materials, including a portion of the materials  
9 identified by the designation "NOTS" (hereinafter referred to as  
10 "STOLEN CONFIDENTIAL MATERIALS"). After AOSH-EU/AF personnel  
11 complied with these Defendants' request, these Defendants left  
12 the premises with the STOLEN CONFIDENTIAL MATERIALS.

13           33. Thereafter, personnel at AOSH-EU/AF discovered  
14 that these Defendants were indeed not representatives of RTC,  
15 and had no authority to see or possess the above described  
16 confidential materials. The Danish Police then arrested and  
17 jailed Defendant ROBIN SCOTT for the theft of the above  
18 described materials. ROBIN SCOTT confessed to the Danish Police  
19 that he was responsible for arranging the above theft and was  
20 later convicted for his activities under Danish Law. The Danish  
21 Police were unable to recover all of the STOLEN CONFIDENTIAL  
22 MATERIALS.

23           34. Plaintiffs are informed and believe and thereon  
24 allege that on or before December, 1983, HARVEY HABER, DAVID  
25 MAYO, JOHN NELSON and DOES 1 through 100 communicated, with RON  
26 LAWLEY and ROBIN SCOTT for the purpose of negotiating with

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1 LAWLEY, SCOTT, BELLMAINE and BIS3EY for the purchase of the  
2 STOLEN CONFIDENTIAL MATERIALS and further negotiated the manner  
3 in which such materials would be exchanged.

4 35. Plaintiffs are informed and believe and thereon  
5 allege that in late January, 1984, in furtherance of an  
6 agreement to "acquire the aforementioned stolen materials,  
7 Defendant NELSON traveled to the United Kingdom to discuss and  
8 work out further details regarding the exchange of the STOLEN  
9 CONFIDENTIAL MATERIALS and to discuss future business  
10 arrangements.

11 36. Plaintiffs are informed and believe and thereon  
12 allege that as early as February, 1984, certain of the  
13 aforementioned STOLEN CONFIDENTIAL MATERIALS, including the  
14 materials identified by the designation "NOTS", were caused to  
15 be transferred to Defendant AAC in Santa Barbara, California by  
16 Defendants.

17 37. Plaintiffs are informed and believe and thereon  
18 allege that JON ZEGEL participated in the conspiracy to procure  
19 the STOLEN CONFIDENTIAL MATERIALS." In addition, Plaintiffs  
20 further allege that Defendants JON ZEGEL and his wife, VIVIEN  
21 ZEGEL, currently possess and offer such STOLEN CONFIDENTIAL  
22 MATERIALS along with other parts of The Advanced Technology to  
23 persons through an entity doing business as "CLEAR CENTER" which  
24 is owned and operated by JON ZEGEL and VIVIEN ZEGEL.

25 38. Defendants and each of them continue to  
26 clandestinely copy, transport in interstate commerce, alter and  
27 otherwise use the STOLEN CONFIDENTIAL MATERIALS along with other  
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1 confidential materials of plaintiffs as part of an effort to  
2 establish and develop organizations, such as Defendants AAC,  
3 AAC-CAN, and AAC-EG and a supportive clientele for their  
4 organizations, all in violation of the rights of Plaintiffs.

5  
6 FIRST CAUSE OF ACTION

7 (RACKETEERING 18 U.S.C. § 1962(c))

8 39. This cause of action is against all Defendants  
9 and arises under the racketeering laws of the United States, and  
10 more particularly, the Racketeering Influence and Corrupt  
11 Organizations Act (18 U.S.C. S 1961 et seq.).

12 40. This Court has jurisdiction over Defendants since  
13 they have committed and are continuing to commit, in intrastate,  
14 interstate and foreign commerce by telephone, mail, wire,  
15 interstate carrier and other means, tortious and wrongful acts  
16 within this Court's jurisdiction.

17 41. Plaintiffs incorporate herein by this reference  
18 the allegations contained in paragraphs 1 through 38 as though  
19 **fully** set forth.

20 42. Defendants are persons within the meaning of the  
21 Racketeering Influenced and Corrupt Organizations Act, 18 U.S.C.  
22 § 1961(3) and § 1952(c) .

23 43. Defendants functioned as a unit to unlawfully  
24 misappropriate, steal, counterfeit, use and otherwise  
25 disseminate certain confidential and proprietary materials of  
26 Plaintiffs, including the portion of the Advanced Technology  
27 referred to above as STOLEN CONFIDENTIAL MATERIALS; and have  
28 do--^ so in furtherance of a common plan and scheme to establish

1 a network of organizations including Defendants AAC, AAC-CAN and  
2 AAC-EG, to sell and disseminate such stolen materials from  
3 Plaintiffs for the purpose of defrauding parishoners of  
4 Plaintiffs and the public to the detriment of Plaintiffs.

5 44. The association-in-fact of Defendants for the  
6 common purpose of furthering their plan and scheme to "  
7 misappropriate Plaintiffs' confidential materials to be Msec,  
8 among ether things, to defraud Plaintiffs and the public is an  
9 enterprise within the meaning of 18 U.S.C. § 1361(4).

10 Defendants conducted and continue to conduct the affairs of  
11 **their** association-in-fact, which enterprise affects interstate  
12 commerce, through a pattern of racketeering activity, in that  
13 each Defendant has knowingly and willfully committed either  
14 **directly** or indirectly, or conspired to commit, two or more acts  
15 of racketeering.

16 45. Defendants participated, directly or indirectly,  
17 in the conduct of their enterprise or association-in-fact  
18 through a pattern of racketeering activity as follows:

19 (a) On or about October, 1983, Defendant RON  
20 LAWLEY caused to be delivered by mail from the United Kingdom, a  
21 written document proposing the creation and affiliation of  
22 Advanced Ability Centers in California and in the United Kingdom  
23 in furtherance of Defendants plan and scheme to harm Plaintiffs  
24 as described above. Said written document was received by  
25 Defendant Advanced Ability Center in California after delivery  
26 by the Postal Service. Defendants use of the mails in this

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1 fashion was for the purpose of executing Defendants' scheme or  
2 artifice to defraud Plaintiffs and the public and constitutes  
3 mail fraud within" the meaning of 18 U.S.C. § 1341.

4 (b) On or about mid-December 1983, Defendant  
5 HARVEY HABER caused to be deposited in California for delivery  
6 by mail to Defendant AAC-EG a written document making  
7 arrangements for Defendants to -travel to England 'for the purpose  
8 of refining the affiliation of the Advanced Ability Centers and  
9 of obtaining and transporting the STOLEN CONFIDENTIAL MATERIAL  
10 back to the United States. The use of the mails in this fashion  
11 was for the purpose of executing Defendants' scheme or artifice  
12 to defraud Plaintiffs and the public and constitutes mail fraud  
13 within the meaning of 18 U.S.C. § 1341.

14 (c) On or about mid-December, 1983, KARVEY HABER  
15 caused oral communications to be transmitted by telephone or  
16 wire to Defendant RON LAWLEY in the United Kingdom wherein  
17 Defendants discussed the terms for delivery and exchange by  
18 LAWLEY to the Defendants residing in the United States of the  
19 STOLEN CONFIDENTIAL MATERIALS in furtherance of Defendants'  
20 scheme or artifice to defraud Plaintiffs and the public. The  
21 use of the telephone or wires in this fashion constitutes wire  
22 fraud within the meaning 10 U.S.C. § 1343.

23 (d) Plaintiffs are informed and believe and  
24 thereon allege that on or about February 1984, Defendants caused  
25 the STOLEN CONFIDENTIAL MATERIALS to be transported in  
26 interstate and foreign commerce with the knowledge that the same  
27 had been stolen, converted or taken by fraud. The value of  
28 these stolen materials transported by Defendants has a value in

1 excess of Five Thousand Dollars (?5,000.00). The transport or  
2 these STOLEN CONFIDENTIAL MATERIALS by Defendants constitutes  
3 transportation of "stolen goods within the meaning of 18 U.S.C.  
4 § 2314.

5 (e) On or about February, 1984, Defendants ROBIN  
6 SCOTT and ADRIENNE SCOTT caused to be delivered by mail in the  
7 United States- a written, printed document indicating the  
8 availability of certain of the STOLEN CONFIDENTIAL MATERIAL,  
9 including material identified by the designation "NOTS," from  
10 Defendant AAC-CAN. Defendants' use of the mails in this fashion  
11 was for the purpose of executing Defendants' scheme or artifice  
12 to defraud Plaintiffs and the public and constitutes mail fraud  
13 within the meaning of 18 U.S.C. § 1341.

14 (f) On or about February 1984, and continuing  
15 monchly thereafter, Defendant AAC caused to be delivered by mail  
16 newsletters and/or journals sent to the public and parishioners  
17 of Plaintiffs misrepresenting that certain of the STOLEN  
18 CONFIDENTIAL MATERIAL, including material identified by the  
19 designation "NOTS," were legitimately available for sale through  
20 Defendant AAC. The use of the mail in this fashion was for the  
21 purpose of executing Defendants' scheme or artifice to defraud  
22 Plaintiffs and the public and constitutes mail fraud within the  
23 meaning of 18 U.S.C. §1341.

24 (g) On or about March 1984, and continuing  
25 thereafter, Defendants caused to be received, concealed, sold  
26 and disposed the STOLEN CONFIDENTIAL MATERIALS of a value of  
27 \$5,000.00 or more, moving as, or which are a part of, or which  
28 constitute interstate or foreign commerce," knowing the same to

1 have been stolen, unlawfully converted, or taken. The sale and  
2 receipt of Plaintiff's STOLEN CONFIDENTIAL MATERIALS constitute  
3 the sale or receipt of stolen goods within the meaning of 18  
4 U.S.C. § 2315.

5 46. Defendants AAC, AAC-CAN and AAC-EG are also  
6 enterprises within the meaning of 18 U.S.C. § 1961(4).  
7 Defendants have been employed by or associated with these  
8 enterprises, the activities of which affect interstate and  
9 foreign commerce, and have knowingly and willingly conducted or  
10 participated in the conduct of the affairs of said enterprises,  
11 either directly or indirectly, through a pattern of racketeering  
12 activity as follows:

13 (a) Plaintiffs incorporate herein by this  
14 reference the allegations contained in paragraphs 45 (a-g).

15 47. The acts of Defendants constitute a pattern of  
16 racketeering activity under 18 U.S.C. § 1961(5) in that at least  
17 two acts of racketeering activity have occurred within ten years  
18 of each other, one of such acts having occurred after  
19 October 10, 1970.

20 48. By reason of Defendants' pattern of racketeering  
21 activity in violation of 18 U.S.C. § 1962(c), Plaintiffs have  
22 suffered injury in their operations and to their property.. The  
23 natural, probable and foreseeable result of the conduct of  
24 Defendants is to substantially damage the property interest of  
25 the Plaintiffs in their confidential and proprietary materials.  
26 Plaintiffs have thus suffered immediate and pecuniary damages  
27 which are not presently ascertainable and will be proven at  
28 trial.

1           49. Plaintiffs have no adequate remedy at law; in that  
2 the confidential and proprietary materials which Defendants have  
3 and are continuing to misappropriate, use, disseminate and  
4 alter, constitute the fundamental underpinnings of the  
5 technology and the Religion. Unless Defendants and each of them  
6 are preliminarily and permanently enjoined from continuing in  
7 their predatory and willfully harmful conduct, Plaintiffs and  
8 their members will continue to be irreparably harmed.

9  
10                                 SECOND CAUSE OF ACTION

11                                 (Racketeering 18 P.S.C. § 1962(a))  
12

13           50. This cause of action is against all Defendants  
14 and arises under the racketeering laws of the United States, and  
15 more particularly, the Racketeering Influence and Corrupt  
16 Organizations Act (18 U.S.C. § 1961 et seq.)

17           51- This Court has jurisdiction over Defendants since  
18 they have committed and are continuing to commit, in intra-  
19 state, interstate and foreign commerce by telephone, mail, wire,  
20 interstate carrier and other means, tortious and wrongful acts  
21 within this Court's jurisdiction.

22           52. Plaintiffs incorporate herein by reference the  
23 allegations contained in the First Cause of Action for  
24 racketeering, paragraphs 39 through 49, as though fully set  
25 forth herein.

26           53. Plaintiffs are informed and believe and thereon  
27 allege that Defendants have derived income, directly or  
28 indirectly, from a pattern of racketeering activity to use or

1 invest, directly or indirectly, portions of such income, or the  
2 proceeds thereof, in acquisition of an interest in, or the  
3 establishment or operation of, one or more enterprises engaged  
4 in, or the activities of which affect, interstate commerce.

5 54. By reason of defendants' pattern of racketeering  
6 **activity** in violation of 18 U.S.C. § 1962(a), plaintiffs have  
7 suffered injury in their operations and to their property. The  
8 natural, probable and foreseeable result of the of the conduct  
9 of defendants is to substantially damage the property interests  
10 of the plaintiffs in their confidential and proprietary  
11 **materials**. Plaintiffs have thus suffered immediate and  
12 pecuniary damages which are not presently ascertainable and will  
13 be proven at trial.

14 55. Plaintiffs have no adequate remedy at law in that  
15 the confidential and proprietary materials which defendants have  
16 and are continuing to misappropriate, use, disseminate and  
17 alter, constitute the fundamental underpinnings of the  
18 technology and the Religion. Unless defendants and each of them.  
19 **are** preliminarily and permanently enjoined from continuing in  
20 **their** predatory and wilfully harmful conduct, plaintiffs and  
21 their members will continue to be irreparably harmed.

22  
23 THIRD CAUSE OF ACTION

24 (RACKETEERING 18 U.S.C. § 1962(d))

25 56. This cause of action is against all Defendants  
26 and arises under the racketeering laws of the United States, and  
27 more particularly, the Racketeering Influence and Corrupt  
28 Organizations Act (18 U.S.C. § 196.1 et seq) .

1           57. This Court has jurisdiction over Defendants since  
2 they have conspired to commit, committed and are continuing to  
3 commit, in intrastate, interstate and foreign commerce by  
4 telephone, mail, wire, interstate carrier and other means,  
5 tortious and wrongful acts within this Court's jurisdiction.

6           58. Plaintiffs incorporate herein by reference the  
7 allegations contained in the First and Second Causes of Action  
8 for Racketeering, paragraphs 39 through 55, as though fully set  
9 forth herein.

10           59. In doing the acts alleged above, Defendants  
11 conspired to conduct the affairs of the affected enterprises  
12 through a pattern of racketeering activity.

13           60. By reason of Defendants' pattern of racketeering  
14 activity in violation of 18 U.S.C. § 1962(c), Defendants have  
15 suffered injury in their operations and to their property.

16           61. Plaintiffs have no adequate remedy at law in that  
17 the confidential and proprietary materials which Defendants have  
18 and are continuing to misappropriate, use, disseminate and  
19 alter, constitute the fundamental underpinnings of the  
20 technology and the Religion. Unless Defendants and each of them  
21 are preliminarily and permanently enjoined from continuing in  
22 their conspiratorial, predatory and willfully harmful conduct,  
23 Plaintiffs and their members will continue to be irreparably  
24 harmed.

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FOURTH CAUSE OF ACTION

(False Designation of Origin and False  
Description Under 15 U.S.C. § 1125(a))

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2  
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4 62. This cause of action is against all Defendants  
5 and arises under Federal Law and more particularly Section 43(a)  
6 of the Lanham Act (15 U.S.C. § 1125(a)).

7 63. This Court has jurisdiction since Defendants have  
8 conspired to commit, committed and are continuing to commit  
9 tortious and wrongful acts in interstate commerce tortious and  
10 within this Court's jurisdiction.

11 64. Plaintiffs incorporate herein by this reference,  
12 the allegations contained in paragraphs 1 through 38 as though  
13 fully set forth herein.

14 65. As discussed in paragraphs 20 through 27,  
15 Plaintiffs' confidential and proprietary materials and  
16 information, including the STOLEN CONFIDENTIAL MATERIALS, have  
17 become identified with the Plaintiffs and are of great value.

18 66. Defendants are misrepresenting to the public that  
19 their services are based upon, or are the same as, the services  
20 of Plaintiffs, that certain of them are based upon Plaintiffs'  
21 confidential and proprietary materials and information,  
22 including the STOLEN CONFIDENTIAL MATERIALS, and in so doing,  
23 have used a false designation of origin or a false description  
24 or representation that constitutes false description, false  
25 representation and false advertising and have caused such goods  
26 and services to enter into interstate commerce.

27 67. Plaintiffs are informed and believe and thereon  
28 allege that Defendants have, with full knowledge of Plaintiffs'

1 rights, deliberately and intentionally made false  
2 representations as to the nature and origin of their goods and  
3 services, with the result that the goods and services of the  
4 Defendants, will appear to the public as being authorized by  
5 Plaintiffs and as legitimately and properly applied standard  
6 technology.

7 68. Plaintiffs are informed and believe and thereon  
8 allege that Defendants' aforementioned misrepresentations of  
9 their goods and services has created a likelihood of confusion,  
10 deception and mistake in the minds of the public as to the  
11 actual nature and source of Defendants' goods and services.

12 69. Plaintiffs are informed and believe and thereon  
13 allege that Defendants have transported and caused to be  
14 transported in interstate and foreign commerce Plaintiffs'  
15 confidential and proprietary materials, including the STOLEN  
16 CONFIDENTIAL MATERIALS with knowledge of the falsity of  
17 Defendants' description of origin, description or  
18 representation.

19 70. Further, plaintiffs are informed and believe and  
20 thereon allege that Defendants, and each of them, intend that  
21 the public conclude that:

22 (a) Defendants', goods and services are based on  
23 standard technology as delivered by Plaintiffs;

24 (b) Defendants' materials and information are  
25 legitimately derived from Plaintiffs' confidential, secret and  
26 proprietary materials; and

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1 (c) Defendants ,.AAC, , AAC-CAN and AAC-EG are  
2 legitimately authorized to use the confidential and proprietary  
3 materials of Plaintiffs.

4 71. The natural, probable and foreseeable result of  
5 the conduct of these Defendants, is to substantially damage the  
6 property interests of Plaintiffs in their confidential and  
7 proprietary materials. Plaintiffs have thus suffered immediate  
8 and pecuniary damages which are not presently ascertainable and  
9 which will be proven at trial.

10 72. Plaintiffs have no adequate remedy at law in that  
11 the confidential and proprietary materials which Defendants have  
12 and are continuing to misappropriate, use, disseminate and  
13 alter, constitute the fundamental underpinnings of the Religion  
14 and the technology. Unless Defendants are preliminarily and  
15 permanently enjoined from continuing in their conspiratorial,  
16 predatory and wilfully harmful conduct, Plaintiffs, and their  
17 members, will continue to be irreparably harmed.

18 73. Plaintiffs have no adequate remedy at law to  
19 compel Defendants to cease their wrongful interference and,  
20 unless this Court grants an injunction, Plaintiffs will be  
21 compelled to prosecute a multiplicity of actions, one each time  
22 Defendants engage in such wrongful conduct in the future.

23 74- Plaintiffs are informed and believe and thereon  
24 allege that the aforementioned acts of said Defendants have  
25 been, and are being, committed with full knowledge of  
26 Plaintiffs' rights and in willful and wanton disregard of those  
27 rights and with malice to Plaintiffs and their parishioners.  
28 Therefore, Plaintiffs are entitled to exemplary and punitive

1 damages in an amount which this Court deems equitable and  
2 proper.

3  
4 FIFTH CAUSE OF ACTION

5 (Common Law Unfair Competition)

6 75. This cause of action is against all Defendants  
7 and arises under the Laws of the State of California.

8 76. Plaintiffs incorporate herein by this reference  
9 the allegations contained in paragraphs 62 through 74, as though  
10 fully set forth herein.-

11 77. As a result of exclusive and extensive use and  
12 delivery of the Advanced Technology by Plaintiffs and other  
13 related entities, the Advanced Technology, including, but not  
14 limited to the materials designated as "NOTS", have become-  
15 associated with Plaintiffs and their related entities.

16 78. Plaintiffs are informed and believe and thereon  
17 allege that in furtherance of the aforescribed conspiracy,  
18 Defendants intentionally and willfully committed at least the  
19 following acts of unfair competition:

20 (a) Misrepresented to the public that certain  
21 services which Defendants rendered and continue to render were  
22 and are the same services rendered by Plaintiffs and other  
23 related entities and that those services are based upon the  
24 proper manner and standards for the application of the  
25 technology.

26 (b) Misrepresented to the public that materials  
27 sold, advertised, delivered and otherwise disseminated to the  
28 public have their basis in the standard technology, when in fact

1 these materials are legitimately possessed and these services  
2 are legitimately delivered only by Plaintiffs; and

3 (c) Misrepresented materials and information  
4 that they have used, delivered and otherwise disseminated as  
5 authentic, and legitimately in their possession, when in fact  
6 the materials and information were wrongfully obtained, altered  
7 and used as alleged herein.

8 79. Plaintiffs are informed and believe and thereon  
9 allege that Defendants have continued to make the  
10 misrepresentations and have continued to conspire against  
11 Plaintiffs, as herein alleged, for the purpose of interfering  
12 with Plaintiffs' relationships with its parishioners and of  
13 confusing parishioners and members of the general public into  
14 purchasing Defendants' services rather than the religious  
15 services of Plaintiffs. Further, Plaintiffs are informed and  
16 believe and thereon allege that unless restrained by this Court,  
17 Defendants will continue to interfere with Plaintiffs'  
18 relationships with its parishioners as herein alleged.

19 80. Defendants have done, and are doing, the things  
20 herein alleged with the intent of injuring Plaintiffs' relations  
21 with its parishioners and in doing so Defendants, and each of  
22 them, have acted maliciously and oppressively towards  
23 Plaintiffs.

24 81. The natural, probable and foreseeable result of  
25 the activities of Defendants as herein alleged, is to cause  
26 confusion, deception and mistake among the consuming public as  
27 to the nature of the services of said Defendants.

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1 82. A further natural, probable and foreseeable  
2 result of the aforescribed acts of said Defendants is to caused  
3 Plaintiffs to suffer immediate and pecuniary damages which are  
4 not presently ascertainable and which will be proven at trial.

5 83. Plaintiffs have no adequate remedy at law in that  
6 the above activities of Defendants have irreparably harmed the  
7 fundamental underpinnings of the Religion and the technology.  
8 Unless Defendants are enjoined from continuing in their  
9 conspiratorial, predatory and willfully harmful conduct,  
10 Plaintiffs, their members, and the general public, will continue  
11 to be irreparably harmed.

12 84. Plaintiffs have no adequate remedy at law to  
13 compel Defendants to cease their wrongful interference and,  
14 unless this Court grants an injunction, Plaintiffs will be  
15 compelled to prosecute a multiplicity of actions', one each time  
16 Defendants engage in such wrongful conduct in the future.

17  
18 SIXTH CAUSE OF ACTION

19 (Unfair Competition Under California Business  
20 and Professions' Code, 55 17200 and 17500 et seq.)

21 85. This cause of action is against all Defendants  
22 and arises under the Laws of the State of California and more  
23 particularly under California Business and Professions Code  
24 Section 17200 and Section 17500 et seq.

25 86. Plaintiffs incorporate herein by this reference  
26 the allegations contained in paragraphs 75 through 84, as though  
27 fully set forth herein.

28 ///

1           87. The activities of said Defendants constitute  
2 unfair competition under the aforementioned California Statutes  
3 since Defendants have engaged in (1) unlawful, unfair and  
4 fraudulent practices; (2) unfair, deceptive, untrue and  
5 misleading advertising; and (3) false advertising.

6           88. Plaintiffs are informed and believe and thereon  
7 allege that Defendants, and each of them, have committed their  
8 unlawful and wrongful acts with the intent to vex, injure and  
9 annoy Plaintiffs and with full knowledge of Plaintiffs' rights  
10 and in willful and wanton disregard of those rights. Plaintiffs  
11 are therefore entitled to exemplary and punitive damages in an  
12 amount which this Court deems equitable and proper.

13           89. The natural, probable and foreseeable result of.  
14 the above breaches of these Defendants is to substantially  
15 injure the property interest of Plaintiffs, in their  
16 confidential and proprietary materials. Plaintiffs have thus  
17 suffered immediate and pecuniary damages which are not presently  
18 ascertainable and will be proven at trial.

19           90. Plaintiffs have no adequate remedy at law in that  
20 the confidential and proprietary materials which Defendants have  
21 and are continuing to misappropriate, use, disseminate and  
22 alter, constitute the fundamental underpinnings of the Religion  
23 and the technology. Unless Defendants, and each of them, are  
24 preliminarily and permanently enjoined from continuing in their  
25 conspiratorial, predatory and wilfully harmful conduct,  
26 Plaintiffs, their members, and the general public will continue  
27 to be irreparably harmed.

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2 91. Plaintiffs have no adequate remedy at law to  
3 compel Defendants' to cease their wrongful interference av.  
4 unless this Court grants an injunction, Plaintiffs will be  
5 compelled to prosecute a multiplicity of actions, one each time  
6 Defendants engage in such wrongful conduct in the future.

7  
8 SEVENTH CAUSE OF ACTION

9 (Receipt and Concealment of stolen property)

10 92. -This cause of action is against all Defendants  
11 and arises under the laws of the State of California and more  
12 particularly Section 496 of the California Penal Code.

13 93. Plaintiffs incorporate herein by this reference,  
14 the allegations contained in paragraphs 85 through 91 though  
15 fully set forth herein.

16 94. Plaintiffs are informed and believe and thereon  
17 allege that beginning December, 1983, and continuing to the  
18 present, Defendants purchased, received and sold r.h.e  
19 aforescribed stolen materials, as herein alleged, with  
20 knowledge that such property was stolen and/or fraudulently  
21 obtained.

22 95. -The natural, probable and foreseeable result of  
23 the conduct of these Defendants to substantially damage the  
24 property interest of Plaintiffs in their confidential and  
25 proprietary materials. Plaintiff have thus suffered immediate  
26 and pecuniary damages which are not presently ascertainable and  
27 which will be proven at trial.

28 96. Plaintiffs have no adequate remedy at law in that  
the confidential materials which these Defendants have bought



1           100. Plaintiffs; incorporate herein b\ reference, the  
2 allegations contained in paragraphs 92 through 93, as though  
3 fully set forth herein.

4           101. The Defendants are former members of Plaintiffs  
5 and its related entities. The Defendants were obligated by  
6 contract not to disclose confidential materials. In addition,  
7 Defendants occupied positions of high fiduciary duty and trust  
8 and by virtue of these affiliations and by virtue of Plaintiffs  
9 having placed confidence in said Defendants, a confidential  
10 relationship existed between Plaintiffs and Defendants. For  
11 example, as discussed more fully in Paragraphs 6 through 16,  
12 Defendants MAYO, ROBIN SCOTT, ADRIENNE SCOTT, NELSON, HABER,  
13 BISBEY, BELLMAINE, LAWLEY and MAYO directly or indirectly  
14 occupied positions of trust and confidence with CSI and/or RTC  
15 and/or CSC, or related organizations and had access to  
16 confidential and proprietary materials of such organizations.  
17 As such, these Defendants had special fiduciary duties and  
18 obligations to Plaintiffs. Said Defendants also held all  
19 confidential and proprietary materials in trust for the purpose  
20 of preserving the purity and ethical use of the philosophy and  
21 the technology of the Religion.

22           102. By virtue of the acts complained of, these  
23 Defendants breached their duties of trust and fiduciary  
24 responsibilities to Plaintiffs.

25           103. The natural, probable and foreseeable result of  
26 the above breaches of these Defendants is to substantially  
27 injure the property interest of Plaintiffs in their confidential  
28 and proprietary materials. Plaintiffs have thus suffered



1 immediate and pecuniary damages which are not presently  
2 ascertainable and will be proven at trial.

3 104. Plaintiffs have no adequate remedy at law in that  
4 the confidential and proprietary materials which Defendants have  
5 and are continuing to misappropriate, use, disseminate and  
6 alter, constitute the fundamental underpinnings of the  
7 technology. Unless Defendants are preliminarily and permanently  
8 enjoined from continuing in their conspiratorial, predatory and  
9 willfully harmful conduct, Plaintiffs, and their members, will  
10 continue to be irreparably harmed.

11 105. Plaintiffs have no adequate remedy at law to  
12 compel Defendants to cease their wrongful interference and,  
13 unless this Court grants an injunction, Plaintiffs will be  
14 compelled to prosecute a multiplicity of actions, one each time  
15 Defendants engage in such wrongful conduct in the future.

16  
17 -NINTH CAUSE OF ACTION  
18 (Breach of Contract)

19 106. This cause of action is against Defendants and  
20 ROBIN SCOTT, ADRIENNE SCOTT, NELSON, HABER, BISBEY, BELLMAINE,  
21 LAWLEY and MAYO arises under the laws of the State of  
22 California.

23 107. Plaintiffs incorporate herein by this reference,  
24 the allegations contained in paragraphs 99 through 105, as  
25 though fully set forth herein.

26 108. Plaintiffs, directly or indirectly, have entered  
27 into various valid and enforceable contracts with Defendants  
28 regarding, among other things, their rights, duties and

1 privileges that inured by virtue of said Defendants' positions  
2 as described in Paragraphs "6 through 16.

3 109. Plaintiffs have performed all obligations  
4 required of it under such contracts and have been excused from  
5 any further obligations due to Defendants' breach of such  
6 contract.

7 110. These contracts, among other things, obligated  
8 the said Defendants to maintain the confidentiality and purity  
9 of the technology and to never disclose any information, data or  
10 knowledge which they would obtain while performing their  
11 respective duties to Plaintiffs, and to abide by their  
12 respective ethical rules and code of honor.

13 111. By-virtue of these contracts and the positions of  
14 high fiduciary duties and trust as aforescribed, said  
15 Defendants agreed to receive in trust and confidence certain  
16 other information within the scope of their duties to Plaintiffs  
17 and to maintain the secrecy and inviolability of this  
18 information for the well-being and protection of Plaintiffs, and  
19 their members.

20 112. Defendants have breached, -and are continuing to  
21 breach at the present time, the aforementioned contracts with  
22 Plaintiffs.

23 113. The natural, probable and foreseeable result of  
24 the conduct of said Defendants is to substantially injure the  
25 property interests of Plaintiffs in their confidential and  
26 proprietary materials. Plaintiffs have thus suffered immediate  
27 and pecuniary damages which are not presently ascertainable and  
28 which will be proven at trial.



1 above documents and information are not available to the public.  
2 The above documents and information are of immense value to  
3 Plaintiffs in propagating the teachings of the Religion to "those"  
4 who have aspired to various levels of qualification in the  
5 Religion. As aforescribed, Plaintiffs have taken substantial  
6 measures to protect their confidential and proprietary  
7 information and materials. Consequently, the information and  
8 materials constitute trade secrets of Plaintiffs.

9  
10 119. As discussed in Paragraphs 6 through 16, and more  
11 particularly in the averments contained in the Eighth and Ninth  
12 Causes of Action, Defendants' ROBIN SCOTT, ADRIENNE SCOTT,  
13 NELSON, HABER, BISBEY, BELLMAINE, LAWLEY and MAYO occupied  
14 positions of high fiduciary duty, trust and confidence, and each  
15 entered into contracts which detailed their fiduciary duties and  
16 responsibilities. These Defendants, and each of them, had  
17 information disclosed to them which they knew was of a highly  
18 confidential and proprietary nature and which they understood  
19 was to be used in trust and confidence exclusively by qualified  
20 and authorized members of Plaintiffs. As further alleged, these "  
21 Defendants agreed and acquiesced in the terms of their  
22 respective contracts,' and knew that under their respective  
23 contracts it was their responsibility to refrain from disclosing  
24 the trade secrets', to the detriment of Plaintiffs, and their  
25 members as well as to the Religion.

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1           120. Notwithstanding these facts, Plaintiffs are  
2 informed and believe and thereon allege that said Defendants  
3 misappropriated, used, altered and disclosed to third parties  
4 the previously unknown trade secrets of Plaintiffs. These  
5 actions were done wrongfully and unlawfully by these Defendants,

6           121. The natural, probable and foreseeable result of  
7 the conduct of Defendants is to substantially damage the  
8 interests of Plaintiffs in their trade secrets and related  
9 materials. Plaintiffs have thus suffered immediate and  
10 pecuniary damages which are not presently ascertainable and  
11 **which will be proven at trial.**

12           122. Plaintiffs have no adequate remedy at law in that  
13 the trade secrets which said Defendants have and are continuing  
14 to misappropriate, use, disseminate and alter, constitute the  
15 fundamental underpinnings of the technology. Unless these  
16 Defendants are preliminarily and permanently enjoined from  
17 continuing in their conspiratorial, predatory and willfully  
18 harmful conduct, Plaintiffs, and their members, will continue to  
19 be irreparably harmed.

20           123. Plaintiffs have no adequate remedy at law to  
21 compel Defendants to cease their wrongful interference and,  
22 unless this Court grants an injunction, Plaintiffs will be  
23 compelled to prosecute a multiplicity of actions, one each time  
24 Defendants engage in such wrongful conduct in the future.

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WHEREFORE, Plaintiffs pray for judgment as follow::

1. For a preliminary and permanent injunction enjoining and restraining Defendants, and each of them, their officers, agents, servants, employees, attorneys and all other persons who act in concert with them from:

(a) Using, disseminating or otherwise disclosing the confidential, secret and proprietary materials of CSI, RTC and CSC to unauthorized third parties;

(b) Altering, destroying or defacing the confidential and proprietary materials of CSI, RTC and CSC;

(c) Misrepresenting to the public that certain services rendered by them are legitimately based on standard technology and on the information and belief derived from the aforementioned confidential and proprietary documents; and

(d) From advertising, selling, delivering or otherwise disseminating to the public the availability of information which is based on the confidential and proprietary materials of Plaintiffs;

2. For a preliminary and permanent injunction Compelling Defendants, and each of them, their officers, agents, servants, employees and attorneys to deliver all materials of CSI, RTC and CSC or copies thereof, which are in their possession, custody or control, to Plaintiffs:

3. For damages in accordance with the proof at trial;

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\* - For treble damages and the cost of the instant suit including reasonable attorneys' fees under 18 U.S.C. § 1964(c) and Section 496 of the California Penal Code;

5. For punitive damages in an amount the Court deems equitable and proper; and

6. For such other and further relief as this Court deems equitable and proper.

DATED: January 30, 1985

Respectfully submitted,

OVERLAND, BERKE, WESLEY, GITS,  
RANDOLPH & LEVANAS

By: Michael I. Levanas  
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A Member of  
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