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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California)
non-profit religious)
organization,)
Plaintiff,)
vs.)
STEVEN FISHMAN AND UWE GEERTZ,)
Defendants.)

Case No. CV 91 6426 HLH (Tx)
DECLARATION OF STACY BROOKS
YOUNG IN SUPPORT OF DEFENDANT
DR. GEERTZ'S (1) OPPOSITION
TO CSI'S MOTION FOR
CONTINUATION OF
CONFIDENTIALITY ORDER ENTERED
SEPTEMBER 22, 1993; (2)
OPPOSITION TO CSI'S MOTION TO
SEAL RE-CREATED VERSIONS OF
PLAINTIFF'S CONFIDENTIAL
UPPER LEVEL SCRIPTURES, AND
(3) OPPOSITION TO CSI'S
MOTION FOR ATTORNEY'S FEES,
COSTS AND SANCTIONS UNDER 29
U.S.C. § 1927, ETC.

Date: April 4, 1994
Time: 10:00 a.m.
Courtroom: 7

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DECLARATION OF STACY BROOKS YOUNG

I, Stacy Brooks Young, declare as follows:

1. I am over the age of 18 years.

2. I have been retained as an expert consultant and expert witness by Dr. Uwe Geertz's counsel in the case captioned Church of Scientology International v. Steven Fishman and Uwe Geertz, #CV-6426-HLH (Tx) currently pending in the United States District Court, Central District of California. The statements herein are of my own personal knowledge or reasonably based upon information and belief, and if called upon as a witness, I can testify competently thereto.

3. This declaration is submitted in support of Defendant Dr. Geertz's Opposition to CSI's Motion for Continuation of Confidentiality Order Entered September 22, 1993, Opposition to CSI's Motion to Seal Re-Created Versions of Plaintiff's Confidential Upper Level Scriptures, and Opposition to CSI's Motion for Attorney's Fees, Costs and Sanctions Under 29 U.S.C. § 1927, Etc.

4. I was a Scientologist for nearly 15 years, from January 1975 until July 1989. I was in the Guardian Office ("GO") and its successor (a name change only), the Office of Special Affairs ("OSA"), for most of that time. I also worked in another part of Scientology called Author Services, Inc. ("ASI").

1 SCIENTOLOGY'S UPPER LEVEL MATERIALS ARE ALREADY
2 EASILY ACCESSIBLE TO THE PUBLIC
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4
5 5. It is incredible that plaintiff CSI is still
6 concerned about maintaining any degree of confidentiality of
7 Scientology's so-called "upper level materials." The
8 information contained in these documents has been available
9 in any large public or university library for many years.
10 Attached as Exhibit 1 is a sampling of the many books and
11 newspaper and magazine articles in which these materials
12 have been published. The fact is that these materials are no
13 longer confidential. They are already broadly publicly
14 available. For the Court to continue to maintain their
15 "confidentiality" is somewhat like closing the barn door
16 after the cows have already escaped.
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18 DR. GEERTZ'S COUNSEL HAS NOT BEEN HARASSIVE IN HIS DEFENSE
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20 6. CSI's counsel accuses Mr. Berry of being harassive
21 in his defense of his client. This is ludicrous. I have
22 personal knowledge that Mr. Berry has not intended to be
23 harassive nor has he acted in a harassive manner. I have
24 been advising him in this case as an expert on Scientology
25 practices, policies and language. CSI cites Mr. Berry's use
26 of certain Scientology words and phrases as an example of
27 his harassive tactics. In fact, I advised Mr. Berry that he
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1 would be much more successful in communicating with
2 Scientologists if he learned the Scientology language and
3 spoke it as much as possible when dealing with
4 Scientologists. In addition, that he learned the Scientology
5 definition of words that are in common English usage but
6 are defined differently by L. Ron Hubbard. In the past,
7 communications between Scientology and opposing counsel
8 would have been like two ships passing in the night. How can
9 it be harassive when someone goes to the trouble to learn an
10 extremely complex language just so that he can better
11 communicate? Or has Scientology now decided that non-
12 Scientologists are not allowed to use Scientology words?

13
14 7. CSI cites two words used by Mr. Berry in a letter
15 as examples of his abuse of the Scientology religion. Yet
16 the two words he used are strictly administrative terms
17 having nothing to do with religious beliefs whatsoever.

18 "Dev-T" is a word that means "Developed Traffic," an
19 administrative term for unnecessary or duplicative work.

20 "CSWP" stands for "Completed Staff Work, Please." This term
21 is simply a request for a full proposal. There is nothing
22 religious in either of these phrases.

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2 THE TESTIMONY OF SCIENTOLOGY EXPERTS
3 IS IN THE PUBLIC INTEREST AND SHOULD NOT BE SEALED

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5 8. Mr. Lubell, an attorney for CSI, stated in his
6 original motion to strike or seal my expert declarations in
7 this case that "If there were such a thing as an 'expert' on
8 Scientology scripture, such a designation could only be made
9 by the Church"; yet the truth is just the opposite. It is
10 only someone who has been directly involved with Scientology
11 management and then leaves the cult, as I did, who can be
12 trusted to provide the Court with straightforward
13 information about the inner workings and practices of
14 Scientology. It is utterly impossible for anyone who is
15 still a Scientologist (and who therefore still believes that
16 their entire future depends upon remaining a Scientologist)
17 to tell the truth about Scientology. The organization would
18 immediately punish anyone who did so. In short, one can only
19 tell the truth after having made the decision no longer to
20 adhere to the policies of Scientology, which include
21 protecting it at all costs and never uttering a word of
22 criticism or adverse testimony.

23 9. Contrary to the representations that have been
24 made about my motives in numerous declarations and motions
25 filed in this litigation, I agreed to assist Mr. Berry in
26 his defense of Dr. Geertz because I think it is crucial for
27 outsiders to begin to understand what Scientology really is,

1 what motivates its members, how the leadership views non-
2 Scientologists and critics of Scientology (particularly
3 psychiatrists and psychologists such as Defendant Dr. Uwe
4 Geertz), how Scientologists manipulate the courts for their
5 own ends, and the cold-bloodedness with which people like
6 Steven Fishman are coerced into parting with huge sums of
7 money.

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9 10. The Scientology attorneys claim that I am putting
10 the "religious beliefs" of Scientology on trial. That is
11 nonsense. This is the United States of America; people have
12 the right to believe whatever they want to and I have no
13 desire to convince anyone to stop believing in the
14 Scientology philosophy. It is the practices of this
15 organization that concern me, not the belief system.
16 Violations of civil and human rights, to say nothing of
17 common decency, are so rampant in this organization that it
18 is extremely difficult for an outsider to comprehend why
19 anyone would remain in such a group.

20 11. Indeed, this is precisely why the Scientologists
21 continue to get away with such abuse. Former members have
22 such bizarre, outrageous tales to tell that outsiders find
23 their stories very difficult to believe, and the
24 Scientologists do everything they can to discredit the
25 former members as mercenaries, liars, thieves, lunatics and
26 worse (as evidenced by the language that has been used by
27 Scientology leaders and their attorneys to describe me

1 during the course of this litigation). The result is that
2 while declaration after declaration has been filed detailing
3 horror stories of sleep deprivation, starvation, involuntary
4 incarceration, loss of consortium, child abuse, suicide,
5 financial crimes and more, Scientology has successfully
6 convinced many courts that the authors of such statements
7 were nothing more than "embittered apostates," as they have
8 now described me.

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10 12. The truth is much simpler: I am no longer under
11 the influence of the coercive and manipulative methods of
12 Scientology and I can now see how abusive the practices of
13 this group are. There are many people who are still its
14 psychological and emotional captives, and these people are
15 not only being victimized by the Scientology Sea
16 Organization command structure but are also perpetrating
17 abuse on others, including children who cannot speak for
18 themselves. People are being held under guard; people are
19 being interrogated on the E-Meter for the slightest
20 infraction or the slightest hint of disaffection; women are
21 being coerced into aborting their unborn children; parents
22 are being kept from their children for weeks and even months
23 at a time. Scientology registrars are coercing people to
24 part with their life savings; they are convincing people to
25 turn over their credit cards; Scientology leaders are
26 pouring money into the Sea Org coffers while staff in the
27 local organizations live in abject poverty.

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2 13. In his declaration of February 28, 1994, Heber
3 Jentzsch objected to my reference to the dangerous methods
4 of Black Dianetics; yet methods of "reverse processing" are
5 employed as control tactics against Scientology staff
6 members on a regular basis. I have no doubt that he himself
7 has been the target of such methods. Such methods include
8 brutal interrogations in which two or more people gang up on
9 someone (who has usually been deprived of sleep for days) in
10 a locked room and scream abuses until the person confesses
11 to anything they want him or her to confess to;
12 "overt/withhold" writeups in which the person is forced to
13 continue writing up "crimes," whether real or imagined,
14 until someone decides he or she has "come clean" and is
15 allowed to stop; "ethics conditions" in which one is not
16 "upgraded" to the next condition until one has satisfied the
17 ethics officer or senior that one has "fully confronted"
18 one's criminality; group "musters" at which staff members
19 are publicly condemned for their "crimes" (this is
20 reportedly a favorite pastime of Miscavige at the high-
21 security Hemet compound), denounced to their peers and
22 ordered to jump into a freezing lake as punishment.

23 14. Mr. Jentzsch stated that both my husband and I
24 have been on the Rehabilitation Project Force, or RPF. This
25 is very true, and it is where the most horrifying of the
26 abuses takes place, out of sight of anyone else, where staff
27 members are stunned to discover that they themselves are

1 Fair Game for whatever punishment or coercive tactics those
2 in control of Scientology think should be meted out to them.
3 There is no recourse short of leaving Scientology; there is
4 no way off the RPF except to finish the program, and the
5 product of the program is a person who will be utterly,
6 uncritically compliant with his or her seniors without
7 question. Until that is achieved the person is not a
8 "product" and must remain on the RPF. I know that this is
9 true. I experienced it, and so did my husband. So have many
10 other people who have already spoken out about these abuses.
11 There are also many, many others who would speak out except
12 that they are afraid of what the Scientologists will do to
13 them for telling the world what is really going on.

14
15 15. I note that there are many things I stated in my
16 declarations which have not been challenged by Mr. Moxon,
17 Mr. Jentsch, Mr. Miscavige, Mr. Starkey or any of the other
18 Scientology leaders in their declarations. This is because
19 what I have said is true, and they would be perjuring
20 themselves to state otherwise. They malign my character;
21 they call me many names; but they do not dispute the facts
22 contained in my declarations. I am "vile" and "scurrilous"
23 not because I am lying, but because I am telling the truth
24 to people outside of Scientology.

25 16. Reference is made to the declarations filed by Mr.
26 Moxon, Mr. Jentsch, Mr. Miscavige, Mr. Starkey and the
27 other Scientology leaders. They are telling what L. Ron

1 Hubbard called "acceptable truths," and Mr. Jentzsch and Mr.
2 Moxon are both veterans of this tactic. So am I; I used to
3 write much of the material that was used to discredit
4 people. Accordingly, I am very familiar with the process by
5 which these declarations were written. These people would
6 have been intently searching through my declarations,
7 looking for statements that could easily be discredited.
8 Obviously they were not able to find very many, based on
9 what they have written.

10
11 17. Mr. Jentzsch provides a good example of a
12 Scientology tactic, which is to divert attention off the
13 actual point. I stated in my January 4 declaration that what
14 I found most shocking about Steven Fishman's treatment by
15 Scientology was that he was sold E-Meters even though he
16 could never qualify for auditing. Mr. Jentzsch never
17 explains why someone who would never be eligible for
18 training or processing would have been sold E-Meters.
19 Instead, he skirts the issue, saying that "the various uses
20 of E-meters by Scientology ministers is hardly relevant to
21 this Court"; yet in fact the uses of the E-Meter are
22 extremely relevant. I repeat what I stated in my earlier
23 declaration: only people who are eligible for auditor
24 training or solo auditing (indeed, only people who are
25 ministers or ministers-in-training) are supposed to be sold
26 E-Meters. Fishman was eligible for neither; he should never
27 have been sold an E-Meter.

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2 18. Mr. Jentzsch then mischaracterizes what I wrote in
3 paragraph 62 of my January 4 declaration. I never said, as
4 he claims, that Fishman was driven mad by reading
5 Scientology materials. On the contrary, I stated, "There is
6 little doubt that Fishman used his E-Meters to 'audit'
7 himself, an action that could easily drive him into a
8 psychotic break." Self auditing is known in Scientology as
9 the sign of a borderline psychotic. To sell someone with a
10 known history of hypnotherapy an E-Meter so that they can
11 self-audit is tantamount to driving them into a psychotic
12 break. Any technically trained Scientologist can confirm
13 this (although no one who is still inside would be allowed
14 to do so).

15 19. Mr. Jentzsch states that the plaintiff "can
16 produce 1,500 staff members of plaintiff [CSI] who are more
17 competent than the Youngs and could testify that they are
18 wrong..." Of course all 1,500 staff members of CSI will
19 testify that I am wrong. If they are ordered to do so, they
20 have no choice. It doesn't matter what they personally
21 believe; if they do otherwise than denounce me for what I am
22 revealing about Scientology, they will be declared
23 Suppressive and expelled, or sent to the RPF to be made more
24 compliant. Indeed, it has been my experience that the
25 current Scientology leaders will stop at nothing to protect
26 Scientology from anyone they perceive as a threat.

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2 20. I am still recovering from my experience in
3 Scientology. I am still learning about how groups like
4 Scientology use coercive methods to control people like
5 myself, my husband and many other individuals who are still
6 under its spell. I believe that all Scientologists, even the
7 current leadership, are the victims of Hubbard's version of
8 mind control, just as I was. These people, including the
9 Scientology attorneys and paralegals who deal with the
10 courts, have no idea how much they are under the coercive
11 influence of Scientology and its leaders. They are utterly
12 fanatical about their dedication, and determined to protect
13 Scientology from "enemies" like my husband and me.

14 21. I have no wish to turn this litigation into a
15 personal "war" with Scientology, as Mr. Jentzsch suggested
16 in his declaration. It is Scientology, by its refusal to
17 admit the truth of its actions, that invariably turns any
18 litigation into a war.

19 22. There have been a number of people before me who
20 have publicly told the truth about Scientology, and nearly
21 every one of them has been threatened, frightened, coerced
22 or bought off into silence. I have spoken to many of these
23 people, and many others who are too frightened to come
24 forward publicly, and I can assure you that the information
25 I have been providing to this Court can be corroborated by
26 many other former Scientologists. These people are not
27 "embittered apostates." They are decent human beings who

1 regret having wasted years of their lives in an organization
2 which they now realize was coercive and destructive of their
3 civil and human rights. They have friends who are still
4 captive, as do I. They want to do whatever they can to help
5 those who are still in this group, as do I. I feel it is my
6 duty to provide the truth to the Court as long as the Court
7 finds it relevant.

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9 23. I also feel it is imperative upon the Court not to
10 seal what I and other Scientology experts like me have to
11 say. There are citizens of the United States, right now,
12 whose civil rights are being trampled upon and who have no
13 recourse to the laws of this country. This is happening
14 right in Los Angeles and many other cities. There is a
15 compound (called "the base" or "Int") near Hemet,
16 California, in Riverside County, where security guards keep
17 watch on the staff members to make sure they do not leave
18 the compound. If these people violate the Scientology rules
19 they risk being refused food and shelter. Others are being
20 involuntarily imprisoned. The women at this compound are not
21 allowed to get pregnant and if they do, they are coerced
22 into getting abortions at the Riverside Planned Parenthood
23 Clinic. Church funds are being spent to build exercise rooms
24 and sports fields for the exclusive use of celebrities like
25 Tom Cruise and Nicole Kidman, using slave labor from the RPF
26 at \$5.00 a week. These laborers are kept up for days at a
27 time at the whim of Scientology leaders like David

1 Miscavige. Children are being kept at camps, away from their
2 parents for weeks at a time. Parents who ask to see their
3 children more than this are frowned upon; children are
4 considered "distractions" to production. Mr. Jentzsch knows
5 this: he and his wife Karen were coerced by David Miscavige
6 into being divorced because Karen wanted Heber to spend more
7 time with their son, Alexander. Miscavige viewed Alexander
8 as a distraction to Heber's production.

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10 24. My expert declarations have nothing to do with
11 religious beliefs. They have to do with serious violations
12 of civil rights of U.S. citizens. This is not the view of
13 an "embittered apostate"; this is the view of a citizen of
14 this country who feels that all Americans have the right to
15 life, liberty and the pursuit of happiness, no matter what
16 their religious beliefs. If the Court were to silence voices
17 like mine, as the Scientologists would like the Court to do,
18 there would be no one to speak for the people who are being
19 victimized and destroyed by this group, people like Fishman
20 and Dr. Geertz whose only crime has been to tell the truth
21 to the best of their knowledge.

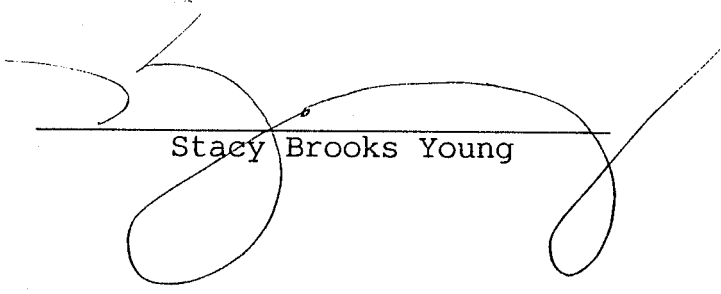
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23 I declare under penalty of perjury under the laws of
24 the United States of America and the State of California
25 that the foregoing is true and correct.

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Executed in Los Angeles, California, this 22nd day of
March, 1994.



Stacy Brooks Young