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FILED

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HAROLD J. MEACHE, County Clerk

K. MEACHE, DEPUTY

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF LOS ANGELES

10
11 SARA NORTHRUP HUBBARD,
12 Plaintiff,

13 vs.

14 L. RON HUBBARD, also known as
15 LAFAYETTE RONALD HUBBARD; Los
16 Angeles Department HUBBARD DIANETIC
17 RESEARCH FOUNDATION, a partnership;
18 THE HUBBARD DIANETIC RESEARCH
19 FOUNDATION OF CALIFORNIA, INC., a
20 California corporation; FRANK B.
21 DESSLER; RICHARD B. DE MILLE;
22 VINCE MC GONIGEL; WESTWOOD NURSES
REGISTRY AGENCY; BEKINS VAN AND
STORAGE CO.; BANK OF AMERICA NATIONAL
TRUST & SAVINGS ASSOCIATION; SECURITY
FIRST NATIONAL BANK OF LOS ANGELES;
DOE ONE, DOE TWO, DOE THREE, DOE FOUR,
DOE FIVE, DOE SIX, DOE SEVEN, DOE
EIGHT, DOE NINE, and DOE TEN,

23 Defendants.

D414498

No. D

COMPLAINT FOR DIVORCE

24
25 COMES NOW the plaintiff and for cause of action against
26 defendants, alleges and says:

27 I

28 That in the early part of 1946, plaintiff, then age 21
29 and unmarried, resided with her family in Pasadena, and attended
30 the University of Southern California; that at said time,
31 defendant, L. Ron Hubbard, hereinafter referred to as "Hubbard",
32 was a married man, age 35, he being then married to Margaret Grubb

1 Hubbard of Bremerton, Washington, they having two children; that
2 said Hubbard represented to plaintiff that he was single and un-
3 married, and plaintiff relying upon said representation, and hav-
4 ing fallen in love, entered into a marriage ceremony with said
5 Hubbard on the 10th day of August, 1946, at Chestertown, Maryland;
6 that said Hubbard thereafter secured a divorce from said Margaret
7 Grubb Hubbard on or about the 24th day of December, 1947, at
8 Port Orchard, Washington; that plaintiff and said Hubbard ever
9 since the said 10th day of August, 1946, have lived together as
10 husband and wife, and on the 8th day of March, 1950, had a child
11 born to them, Alexis Valorie Hubbard, at Point Pleasant, New
12 Jersey; that the parties have always considered themselves
13 husband and wife in their travels about the nation; that at all
14 times herein mentioned, said Hubbard has represented to plaintiff
15 that they were legally married, and plaintiff relied upon such
16 representations; that by reason thereof, plaintiff alleges herein
17 that plaintiff and said Hubbard are husband and wife; that in
18 the event it should be held that the parties are not legally
19 married, plaintiff will seek the damages prayed for herein for
20 fraud and deceit on the part of said Hubbard, in entrapping
21 plaintiff into the matrimonial predicament that she now finds
22 herself in.

23 II

24 That plaintiff was born in Pasadena, California on the
25 8th day of April, 1925, and grew up and was educated in the State
26 of California; that plaintiff does now and always has considered
27 California to be her home state, and plaintiff and said Hubbard
28 have maintained their residence in California from time to time
29 since said marriage in between their travels about the United
30 States, and at all times have had their furniture in the State of
31 California, and have considered California to be their permanent
32 residence; that by reason thereof, plaintiff is now and for more

1 than one year immediately preceding the commencement of this
2 action, has been a resident of the State of California; that
3 plaintiff has been a resident of the County of Los Angeles for
4 more than three months, immediately preceding the commencement
5 of this action.

6 III

7 Statistical facts required by section 426a of the Civil
8 Code of Procedure are:

9 (1) Place of marriage: Chestertown, Maryland;

10 (2) Date of marriage: On the 10th day of August,
11 1946;

12 (3) Date of separation: On or about the 24th day of
13 February, 1951;

14 (4) Time elapsing between the date of marriage and
15 the date of separation: Approximately four years, six months
16 and twelve days; and

17 (5) There is one child of the marriage: Alexis
18 Valorie Hubbard, age 13 months.

19 IV

20 That there is community property of the plaintiff and
21 said Hubbard consisting of a community interest in the Hubbard
22 Dianetic Research Foundation, with its headquarters in Elizabeth,
23 New Jersey, and which operates a school and clinic in Chicago,
24 Illinois, New York City, Los Angeles, Honolulu, Wichita, Kansas,
25 and elsewhere; that said Hubbard and said foundation did over
26 one million dollars in business during the year 1950, and owns
27 valuable community property and assets; that said foundation
28 operates in the State of California, under the name of "The
29 Hubbard Dianetic Research Foundation of California, Inc., a
30 California corporation", defendant herein; that said corporation
31 is the alter ego of said Hubbard.
32

1
2 That said separation took place by reason of the extreme
3 cruelty practiced upon the plaintiff by the said Hubbard, which
4 has caused the plaintiff great mental anguish and physical suffer-
5 ing during the past five years of the married life of the parties,
6 consisting in part as follows:

7 (a) That during the marriage up until the month of
8 October, 1950, said Hubbard, an "older man", completely dominated
9 the youthful plaintiff, both physically, mentally and emotionally
10 and taking advantage of her trusting love and desire for a success-
11 ful marriage, repeatedly subjected plaintiff to systematic torture,
12 including loss of sleep, beatings, and strangulations and scientific
13 torture experiments, including the following:

14 (b) That in the latter part of September, 1950, said
15 Hubbard told plaintiff at the Chateau Marmont Apartments in
16 Hollywood, that "I do not want to be an American husband for I
17 can buy my friends whenever I want them", and he further said
18 that he, Hubbard, did not want to be married, yet divorce was
19 impossible, for a divorce would hurt his reputation, and that
20 she, plaintiff, should kill herself if she really loved him.

21 (c) That at said time and place, said Hubbard systemati-
22 cally prevented plaintiff from sleeping continuously for a period
23 of over four days, and then in her agony, furnished her with a
24 supply of sleeping pills, all resulting in a nearness to the
25 shadow of death. That the foregoing was a frequent occurrence
26 during the married life of the parties.

27 (d) That at said time and place, plaintiff became numb
28 and lost consciousness, and was thereafter taken by said Hubbard to
29 the Hollywood Leland Hospital, where she was kept under a vigilant
30 guard from friend and family, under an assumed name, for five
31 days.

32 (e) That shortly following Christmas, 1950, said Hubbard

1 violently strangled plaintiff and sadistically ruptured the
2 eustachian tube of her left ear, resulting in the impairment of
3 her hearing. That such strangulation of plaintiff was a frequent
4 practice on the part of said Hubbard.

5 (f) That in January, 1951, at Palm Springs, while
6 plaintiff was getting out of an automobile operated by said Hubbard
7 he intentionally started the said car in gear, thus propelling
8 plaintiff to the pavement resulting in serious personal injury.

9 (g) That plaintiff and her medical advisors, following
10 the foregoing incidents, concluded that said Hubbard was hopelessly
11 insane, and crazy, and that there was no present hope for said
12 Hubbard, or any reason for her to indure further; that competent
13 medical advisors recommended that said Hubbard be committed to
14 a private sanitarium for psychiatric observation and treatment
15 of a mental ailment known as paranoid schizophrenia; that
16 plaintiff, on the 23rd day of February, 1951, caused the national
17 executive officer of the Hubbard Dianetic Research Foundation at
18 Elizabeth, New Jersey, to be advised of said preliminary diagnosis
19 and urgent need for treatment; that said national officer immedi-
20 ately advised said Hubbard of said diagnosis.

21 (h) That at 11:00 o'clock P.M., on said 23rd day of
22 February, 1951, said Hubbard, together with defendant Frank B.
23 Dessler, head of the Los Angeles Dianetic Foundation, abducted the
24 infant child of the parties, Alexis, from her crib, and deposited
25 said infant in West Los Angeles with defendant Vince Mc Conigle
26 under the assumed name of Anne Marie Olson, and concealed said
27 infant from plaintiff until this day. That this was admitted by
28 said Dessler in the habeas corpus proceedings filed on the 10th
29 day of April, 1951, entitled In re Alexis Valorie Hubbard, Los
30 Angeles Superior Court Number H.C. 35879.

31 (i) That said Hubbard, Dessler and defendant Richard B.
32 De Mille, having secreted said infant child, feloniously dragged

1 plaintiff out of her bed attired only in her night gown, it then
2 being 1:00 o'clock A.M., of the morning of the 24th day of
3 February, 1951, and by the use of threats, strangulation, torture,
4 and false promises to return her child to her, carried and kidnapp-
5 ed plaintiff to Yuma, Arizona, all as is detailed at length in the
6 habeas corpus proceeding above mentioned.

7 (j) That plaintiff has ever since sought the whereabouts
8 of her infant child, and has consulted attorneys, police, sheriffs,
9 Federal Bureau of Investigation agents, and courts, and has brought
10 said habeas corpus proceedings; that said Hubbard and his attorneys
11 refuse any information as to the whereabouts of her infant child,
12 unless she goes back to live with said Hubbard, an alternative
13 that means certain continued torture and possible death, a pre-
14 dicament no good woman, wife and mother should have to face.

15 (k) That through all her trials and tribulations, and
16 up until the month of February, 1951, plaintiff bore her suffering
17 and sorrow, in silence, and even now would not bare the truth to the
18 world, except for the compelling advice of her attorney, Caryl
19 Warner, that she tell the truth for the truth will make her free,
20 and the truth alone, will bring back her baby, if alive.

21 (l) That by reason of the foregoing crazy misconduct
22 of said Hubbard, plaintiff is in hourly fear of both the life
23 of herself and of her infant daughter, who she has not seen for
24 two months.

25 That all of said acts on the part of said Hubbard towards
26 the plaintiff have been without cause or justification, and without
27 the consent of the plaintiff, and have caused her great mental
28 anguish and horrible physical suffering.

29 VI

30 That the custody of said infant child Alexis should be
31 awarded to plaintiff, without reservation or condition; that the
32 Court should order and compel said Hubbard to submit to a legitimate

1 psychiatric examination in the interests of the welfare and safety
2 of said minor child, who is secreted by Hubbard someplace in North
3 America.

4 VII

5 That said Hubbard is an able-bodied man, and is well able
6 to support and provide for plaintiff and their child; that by
7 reason thereof, said Hubbard should be ordered to pay to plaintiff
8 reasonable support for plaintiff and said infant child during the
9 pendency of this action, and thereafter pay permanent alimony and
10 child support; that in addition thereto, said Hubbard should be
11 ordered to pay a reasonable sum as and for attorney's fees and
12 costs of suit; that a lien should be impressed upon the real
13 property hereinafter described to secure payment of the sums allow-
14 ed herein.

15 VIII

16 That said Hubbard has harrassed, injured and kidnapped
17 plaintiff as alleged herein, and has threatened to kill plaintiff;
18 that plaintiff is informed and believes, and upon such information
19 and belief alleges that said Hubbard, unless restrained from so
20 doing, will carry out his said threats, and will again injure and
21 molest plaintiff; that by reason thereof, the Court should restrain
22 said Hubbard from molesting or injuring plaintiff during the pendency
23 of this hearing of this cause, and upon the trial of this action,
24 the Court should permanently enjoin said Hubbard from committing any
25 of said acts in regard to plaintiff.

26 IX

27 That said Hubbard departed from the State of California
28 on the 24th day of February, 1951, and ever since has remained out-
29 side of California, for the purpose of evading the process of the
30 Court, and for the purpose of attempting to deprive plaintiff of
31 her marital rights herein; that said absence from the State on the
32 part of said Hubbard was and is for the purpose of resisting

1 plaintiff's efforts to enforce her said rights against said
2 defendant for support and maintenance for herself and her child and
3 to obtain an equitable division of the community property of the
4 parties; that said Hubbard has repeatedly threatened that he
5 would stay out of California so as to make it impossible for her to
6 get any money or support from him and to prevent her from sharing
7 in the community property of the parties, and said Hubbard has
8 stated that he would do everything in his power to deprive plaintiff
9 of all of her said marital rights; that plaintiff is informed and
10 believes, and upon such information and belief, alleges that pur-
11 suant to said threats, said Hubbard has concealed various community
12 assets, and has placed said assets in the name of Hubbard Dianetics
13 Research Foundation, and in the names of the other defendants named
14 herein, and in the names of other persons unknown to the plaintiff;
15 that said Hubbard will continue to further hide and conceal said
16 community property assets from plaintiff unless prevented from
17 doing so by the appointment of a receiver herein; that by reason
18 of the said acts of said Hubbard, plaintiff has been compelled to
19 exhaust her own personal estate, and to draw upon her family for
20 support; that by reason thereof, plaintiff is without adequate
21 funds for her own support or the support of her child, or to
22 prosecute this action; that all of the acts heretofore set forth
23 on the part of said Hubbard were perpetrated intentionally and
24 wilfully and for the express purpose of defrauding plaintiff of
25 her said marital rights, and to unjustly and fraudulently deprive
26 plaintiff of any and all of her rights whatsoever, and to render
27 her helpless and subject to his complete and arbitrary will and
28 domination.

29 X

30 That said receiver should be empowered to take over,
31 operate, and sell the defendant Hubbard Dianetic Research Foundation
32 of California, Inc., property at 2300 South Hoover Street, Los

1 Angeles, California, and more particularly described as:

2 Lot 6 of Belgravia Tract, in the City of
3 Los Angeles, County of Los Angeles, State
4 of California, as per map in Book 23,
5 Page 54 of Miscellaneous Records of said
6 County, and a portion of Lot 3, Block 22,
7 of Hancock's Survey in said City and
8 County of Los Angeles, as per map recorded
9 in Book 2, page 108 of Miscellaneous
10 Records of said county;

11 that said receiver should be allowed to pay to plaintiff such sums
12 as the Court may allow for the support of plaintiff and the minor
13 child, and for her attorney's fees and costs incurred herein; that
14 plaintiff has no plain, speedy or adequate remedy at law other
15 than the appointment of a receiver, for the reasons set forth
16 herein.

17 XI

18 That the true names or capacities, whether individual
19 corporate, associate or otherwise, of defendants Doe One through
20 Doe Ten, inclusive, are unknown to plaintiff, who therefore sues
21 said defendants by such fictitious names, and will ask leave to
22 amend this complaint to show their true names and capacities when
23 same have been ascertained.

24 AND FOR A SECOND, SEPARATE AND FURTHER

25 CAUSE OF ACTION, plaintiff alleges and says:

26 I

27 Plaintiff refers to Paragraphs I, II, III, IV, V, VI,
28 and VII of her First Cause of Action and by reference makes them a
29 part hereof.

30 II

31 That plaintiff believes herself to be the lawfully
32 wedded wife of said defendant L. Ron Hubbard, in that she entered

1 into said marriage in good faith, all as is alleged herein; that
2 in the event the Court should find that she is not legally
3 married to said defendant, plaintiff in such an event alleges that
4 said marriage should be annuled, and that she be awarded damages
5 as hereinafter set forth; that said defendant wilfully and inten-
6 tionally caused plaintiff to believe that she was his lawfully
7 wedded wife, and if she in fact is not, said Hubbard in such an
8 event should be ordered to pay the damages prayed for herein.

9
10 III

11 That plaintiff, believing that she was the lawfully wedd-
12 ed wife of said Hubbard, over a period of five years, devoted her
13 life to said Hubbard, and served as wife, mother, housekeeper,
14 author's assistant, and pursuant thereto, washed dishes, cleaned
15 floors, scrubbed the floors and walls, cooked and served meals for
16 said Hubbard, bore him a child, ~~married him over \$20,000.00~~, and
17 otherwise subjected herself to the course of cruelty alleged
18 herein; that by reason thereof, the chances of plaintiff for
19 happiness in life, and chances for a normal marriage have been
20 diminished, and plaintiff has been prevented from following a
21 profession of her choice, and has been so deprived of the "golden
22 years of a woman's life", and by reason thereof, she has been
23 damaged in the sum of \$100,000.00 a year, making a total of
24 \$500,000.00 in all, if in fact it be found that she is not the
25 lawfully wedded wife of said Hubbard, and has been subjected to
26 the shame of a bigamous marriage.

27 IV

28 That in the event it be found that plaintiff is not the
29 lawfully wedded wife of said Hubbard, plaintiff should be accorded
30 the right of a putative wife, and by reason thereof, should be
31 allowed the same community property rights and interests in and
32 to the property acquired by the plaintiff and the said Hubbard,
following said ceremonial marriage on the 10th day of August,

1 1946, all as is prayed for herein.

2 WHEREFORE, plaintiff prays judgment against defendant,
3 L. Ron Hubbard, as follows:

4 (1) For a judgment of divorce from said defendant,
5 that the bonds of matrimony heretofore and now existing between
6 said parties be dissolved;

7 (2) That the custody of the minor child of the
8 marriage, Alexis Valorie Hubbard, be awarded to plaintiff;

9 (3) That defendant, L. Ron Hubbard be ordered to
10 pay to plaintiff reasonable alimony and support, and further
11 provide reasonable support and maintenance for the minor child
12 of the said marriage, Alexis Valorie Hubbard;

13 (4) That the community property of the parties hereto
14 be equitably apportioned, and the right, title and claim of
15 interest of defendants herein, other than said defendant Hubbard,
16 be determined and adjudicated.

17 (5) That a lien be impressed upon the real property
18 of said defendant Hubbard, to secure the payment of the sums of
19 the alimony and support allowed herein;

20 (6) That reasonable attorney's fees and costs of suit
21 be awarded plaintiff and her counsel, and that said defendant
22 be ordered to pay the same.

23 (7) That in the event it be held that plaintiff is
24 not a resident of the State of California, for the prescribed
25 period, in such an event plaintiff prays that a decree of
26 separate maintenance be entered herein, in lieu of a divorce;

27 (8) That the Court appoint a receiver herein with
28 customary powers to take over, manage, operate, and sell the
29 business and properties of the community estate of the parties
30 including the real property described in the complaint, said
31 property to be held by said receiver subject to the order and
32 direction of the Court, and that all defendants herein be ordered

1 and directed to pay to said receiver, any community funds and
2 deliver any community property they have in their possession,
3 and that said receiver to be appointed ex parte, and that upon
4 notice, said appointment of said receiver be confirmed and made
5 permanent;

6 (9) That said defendant Hubbard be restrained from
7 injuring, molesting, or harming plaintiff, and be restrained from
8 interfering with the custody of the minor child, and that upon
9 the trial of the cause, said restraining order be made permanent;

10 (10) That said Hubbard be restrained from concealing,
11 dissipating, transferring, or hiding any of the community property
12 assets or property of the parties hereto; and

13 (11) That if said marriage be held bigamous, that it be
14 annulled;

15 (12) That plaintiff be awarded damages in the sum of
16 \$500,000.00, if said marriage be found to be invalid;

17 (13) That said Hubbard be ordered to submit to a
18 psychiatric examination as a protection to said infant child; and

19 (14) That plaintiff be awarded any such other and
20 further relief as is meet and proper.

21
22 WARNER & JACKSON

23 By: Caryl Warner

24 Caryl Warner
25 Attorneys for Plaintiff
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1 STATE OF CALIFORNIA)
2 County of Los Angeles) ss.

3
4 SARA NORTHRUP HUBBARD, being by me first duly sworn,
5 deposes and says: that she is the plaintiff in the above
6 entitled action; that she has read the foregoing Complaint
7 for Divorce and knows the contents thereof, and that the same
8 is true of her own knowledge, except as to the matters which are
9 therein stated upon her information or belief, and as to those
10 matters she believes it to be true.

11
12 Sara Northrup Hubbard
13 Sara Northrup hubbard

14
15 Subscribed and sworn to before me
16 this 23rd day of April, 1951.

17 B. R. Trout
18 Notary Public in and for said
19 County of Los Angeles, State of
20 Caolifornia

(SEAL)

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